



January 18, 2024 (Corrected 1/29/2024)

Lauren Whybrew
Olympic Region Clean Air Agency
2940 Limited Lane NW
Olympia, WA 98502

Comments submitted via email to lauren.whybrew@orcaa.org

Re: Comments on the Olympic Region Clean Air Agency's Preliminary Determination to Conditionally Approve Pacific Northwest Renewable Energy's Request to Construct a New Wood Pellet Manufacturing Facility at 411 Moon Island Road, Hoquiam, WA 98550

Dear Ms. Whybrew:

The National Parks Conservation Association, Earthjustice, and Olympic Park Advocates ("Conservation Organizations") submit the following comments on the Olympic Region Clean Air Agency's ("ORCAA") preliminary determination to conditionally approve Pacific Northwest Renewable Energy's ("PNWRE") request to construct a new wood pellet manufacturing facility ("Proposed Pellet Mill") at 411 Moon Island Road, Hoquiam, WA 98550. ORCAA's public notice explains that:

If approved, the proposed facility will emit air pollution from combustion of woody biomass in an industrial furnace, from the drying of biomass feedstock, and from other wood processing activities. The facility will be a "Major Source" of air pollution [under Title V] because emissions of several air pollutants, including Oxides of Nitrogen (NO_x), Carbon Monoxide (CO), and Particulate Matter (PM), may exceed 100 tons per year or more.¹

ORCAA's preliminary determination suggests that proposed pellet mill is not a "Major Stationary Source" as defined in 40 C.F.R. § 52.21(b) and not subject to the Prevention of Significant Deterioration ("PSD") permitting program required by WAC 173-400-700 through

¹ ORCAA Public Notice, *available at* <https://www.orcaa.org/notices/notice-of-construction-pacific-northwest-renewable-energy-2/>.

WAC 173-400-860.² ORCAA’s preliminary determination further suggests that “[t]his conclusion will be assured through annual limits.”³

As discussed in these comments, there are serious errors in the permit application and associated analysis. Contrary to ORCAA’s preliminary determination, the proposed pellet mill is subject to the PSD major source construction permit requirements and case-by-case Maximum Achievable Control Technology determination air toxics requirements. Notably, using emission data collected from other wood pellet mills, the facility-wide potential to emit for several air pollutants greatly exceed the estimates in the application submitted by the permit applicant. The estimates in the table below are conservative because as discussed in these comments the permit applicant did not include all emitting sources, such as from the marine vessels, all emergency engines and other sources.

Table 1. Facility-Wide Potential Estimates: Permit Applicant’s and Revised Based on Source Test Data from Wood Pellet Mills.

	VOC	HAPs	CO	NO _x	PM (filterable)
Permit Applicant Estimate	67 TPY	1.32 TPY	185 TPY	230 TPY	108
Revised Estimate	215 TPY	40 TPY	493 TPY	113 TPY	108
<i>Brief summary of the issue</i>	The permit applicant failed to include VOC emission from: the five pellet storage silos (discussed in section I.B) and from the wet hammermills (discussed in section I.D).	The permit applicant failed to accurately and completely calculate HAP emissions. Discussed in sections I.D and I.E).	The permit applicant failed to include CO emissions from the five pellet storage silos. Discussed in section I.C.	The permit applicant applied an incorrect emission factor for calculating NO _x emissions. Discussed in section II.A.	Because the proposed pellet mill is subject to PSD, fugitive emissions for PM (and the other pollutants) must also be included.

Based on the revised facility-wide potential to emit estimates, the proposed pellet mill would be:

- A major source of HAPs (and required to conduct a case-by-case Maximum Achievable Control Technology analysis)
- Trigger PSD major source requirements for CO emissions (at both the 100 TPY and 250 TPY thresholds)
- Trigger PSD major source requirements for VOCs (at the 100 TPY threshold)

² ORCAA, New Source Preliminary Determination to Approve, Wood Pellet Manufacturing Facility, Pacific Northwest Renewable Energy, LLC, No. 23NOC1606 (Nov. 30, 2023), at 30. (“Preliminary Determination”). (Attachment A).

³ Preliminary Determination at 30.

- Trigger PSD major source requirements for NOx (at the 100 tpy threshold)
- Trigger PSD major source requirements for PM (at the 100 tpy threshold)

The List of Attachments appears at the end of these comments and are available to download at:

https://drive.google.com/drive/folders/1cDkiqvefBZjz4AuYMWh6hiMzwfGI5uHA?usp=drive_link.

National Parks Conservation Association (NPCA) is a national organization whose mission is to protect and enhance America's National Parks for present and future generations. NPCA performs its work through advocacy and education. NPCA has over 1.5 million members and supporters nationwide, including more than 49,000 members and supporters in Washington state, with its main office in Washington, D.C., and 24 regional and field offices. NPCA is active nation-wide in advocating for strong air quality requirements to protect our parks, including submission of petitions and comments relating to visibility issues, regional haze SIPs, climate change and mercury impacts on parks, and emissions from individual power plants and other sources of pollution affecting National Parks and communities. NPCA's members live near, work at, and recreate in all the national parks and wilderness areas, including those that would be directly affected by emissions from the proposed new wood pellet mill.

Earthjustice is a non-profit public-interest environmental law organization that partners with community groups and non-profits to protect people's health, to preserve magnificent places and wildlife, to advance clean energy, and to combat climate change.

Olympic Park Advocates (OPA) is a 501(c)(3) nonprofit citizens conservation organization working to protect the beauty, integrity and biological diversity of Olympic National Park and the Olympic ecosystem. OPA was founded in 1948 to defend the Park against attacks on its spectacular old-growth rain forest valleys. Seventy-three years later, OPA's more than 240 Washington members recognize that having pristine air in Olympic National Park is necessary for the protection of this special place.

If granted, this permit would allow harmful amounts of pollution from this facility, degrading air quality in Olympic and Mount Rainier national parks and harming human health in nearby communities.

The Clean Air Act ("CAA" or "Act") requirements for new source construction are not met in PNWRE's permit application. Despite the Act's regional haze legal requirements to ensure reasonable progress at national parks and the federal and state permitting requirements for construction of new sources, PNWRE's permit application contains fundamental flaws. ORCAA must issue a denial of the request to construct unless PNWRE supplements its permit application with the missing information that complies with the legal requirements of ORCAA's regulations, the Act and federal regulations, and ORCAA and the Washington Department of Ecology require that the proposed new emissions meet all legal requirements.

Of significant concern are the proposed new air pollutant emissions that would contribute to regional haze pollution at nearby Olympic⁴ and Mount Rainier National Parks⁵, as well as contribute to local impacts. Olympic and Mount Rainier National Parks are designated as Class I air protection areas. National parks over 6,000 acres, like Olympic and Mount Rainier, and national wilderness areas over 5,000 acres that were in existence before August 1977 are designated as Class I areas, as defined by an amendment to the Clean Air Act. Olympic is approximately 75 km and Mount Rainier approximately 150 km in distance from the proposed

⁴ Nitrogen deposition is a concern of the National Park Service at Olympic National Park (“... accumulation of nitrogen in mountain lakes influence water quality in Olympic National Park,” *see* National Park Service, Olympic National Park, Environmental Factors, *available at*

<https://www.nps.gov/olym/learn/nature/environmentalfactors.htm>. (Attachment B).

⁵ “Mount Rainier National Park staff are very involved in the National Park Service’s comprehensive air resources management program, designed to assess air pollution impacts and protect air quality related values. Air quality related values include scenic vistas; sensitive natural ecosystem processes, functions, and components; and cultural resources. ... **Air Pollution at Mount Rainier** Mount Rainier National Park is located downwind of a number of urban and industrial areas to the northwest and southwest and is not isolated from the by-products of industrialization. Man-made air pollutants are transported long distances and have been detected through air quality monitoring programs. A number of stationary and mobile sources of pollutants affecting the park include a variety of sources in the Puget Sound region as far north as Vancouver, and as far south as Portland, Oregon. ... **Visibility Impairment** Nearly two million visitors come to Mount Rainier each year to enjoy the scenery, but the view is often obscured by regional haze, especially in the summer. Haze is caused when sunlight encounters fine pollution particles in the air. Some light is absorbed by particles. Other light is scattered away before it reaches an observer. More pollutants result in more absorption and scattering of light, which reduce the clarity and color of what we see. ... **Acid Deposition** As precipitation water passes through the air it reacts with carbon dioxide, sulfur oxides, and nitrogen oxides to form acids. These compounds then fall to the Earth in either dry form (such as gas and particles) or wet form (such as rain, snow, and fog). The park’s lakes and streams are very sensitive to acidic deposition because the soils and bedrock cannot neutralize acids well. Acid deposition impacts aquatic organisms and ecosystems as well as terrestrial life through direct contact and by changing the chemical balance in the soil and increasing the acidity of lakes and streams. Water quality for approximately 20 of the major streams in the park have been inventoried along with approximately 48% of the park lakes. Of these, 10 stream sites have been documented as extremely sensitive, while lakes on the west and south sides of the park tend to be more sensitive. Spring snowmelt or late summer storms can cause highly acidic deposition events which can affect the aquatic ecology of these surface waters. ... **Ozone** Plants can be sensitive to ozone at levels well under the national health standards for people. Lichens, mosses, and liverworts are often the most sensitive components of the vegetation within an ecosystem and can serve as early indicators of air pollution effects. Plants such as trees, shrubs, and herbaceous species are also injured by ozone which can damage leaves and needles and weaken the plants’ ability to withstand disease and insect infestations. Clean air is defined as ozone concentrations ranging from 15 to 30 ppb (parts per billion). Elevated ozone levels (above 80 ppb) were measured at Longmire in the southwest section of Mount Rainier National Park during the summers of 1987 and 1988. Values above 80 ppb were not uncommon at an ozone monitor at Carbon River in the northwest corner of the park during 1989 to 1992 and there were a few readings above 100 ppb. Similar values have been measured at Tahoma Woods, while ozone levels at Paradise have, on some days, been the highest recorded in the state. High levels of ozone have also been measured in rural areas surrounding the park in Enumclaw (10 miles north of the park), Cedar River (30 miles north of the park), and Pack Forest (15 miles west of the park). Chlorotic foliar spotting on the foliage of ponderosa pine at Pack Forest has been reported and scientists hypothesized that ozone-sulfur dioxide synergism was responsible for the damage. Ozone impacts on sensitive vegetation in the Pacific Northwest have received little attention until recent years because of the relatively low levels of ozone in the area. Ozone sensitive species in Mount Rainier have recently been identified and are being monitored in selected areas. ... **Air Toxics** Air Toxics is a term that includes persistent organic pollutants and heavy metals. ... Air toxics also originate from local and regional sources. These contaminants ... may accumulate in annual snowpack, particularly in higher elevation ecosystems. Once deposited, many pollutants, particularly persistent organic pollutants, accumulate and concentrate in foodwebs, threatening the viability of aquatic and terrestrial ecosystems. These air toxics are of particular concern because they remain in the environment a long time, can accumulate in the biological tissue of organisms, and are toxic to humans and wildlife.” *Infra* n.6.

pellet mill. In addition to these parks, some of the surrounding U.S. Forest Service wilderness areas are also designated as Class I areas. Areas designated as Class I and are intended to receive the highest level of air-quality protection including being subject to the Prevention of Significant Deterioration (PSD) provisions under the Clean Air Act.⁶

Factual and Legal Background

The proposed pellet mill would be located on an approximately 60-acre parcel in the city of Hoquiam, Washington. The Proposed pellet mill is designed to produce, store, and export up to 440,800 short tons per year (“TPY”) of wood pellets and is proposed to operate at least 8,000 hours per year. The proposed location is adjacent to the Willis Enterprises Moon Island Chip Mill (“Willis Enterprises”) and near Terminal 3 at the Port of Grays Harbor.⁷ An automated enclosed conveyor would draw pellets from the silos according to loading schedules and transport them via enclosed conveyor⁸ to the neighboring Willis Enterprises’ existing conveyors and marine vessel loadout facilities.⁹

ORCAA’S regulations provide that a Notice of Construction (NOC) Application is required for the Construction of any stationary source. The NOC must be approved by ORCAA, unless certain actions are involved (which do not apply the Proposed pellet mill).¹⁰

In order to receive approval from ORCAA, the proposed construction of the stationary source must meet certain requirements.¹¹ These requirements include the local/State Best

⁶ See National Park Service, Mount Rainier National Park, Air Quality, *available at* <https://www.nps.gov/mora/learn/nature/airquality.htm>. (Attachment C); *see also* National Park Service, Mount Rainier National Park, **Mount Rainier’s Wilderness: A Defense against Climate Change**, *available at* <https://www.nps.gov/mora/learn/nature/climatechange.htm>.

⁷ Preliminary Determination at 3.

⁸ Port of Grays Harbor Wood Pellet Plant, Notice of Construction Permit Application (July 2023), at 3 (“A new conveyor would transport wood pellets from the silos and connect them to the existing Willis Enterprises conveyor system located on the Willis Enterprises chip mill site. Pellets would then be conveyed to the Port of Grays Harbor Terminal 3 for loading onto vessels.”) (“Permit Application”). (Attachment D).

⁹ Preliminary Determination at 11. (Willis Enterprises operates under an RC2-class ORCAA registration (source number 2112, file number 647), its classification means that it has reported potential to emit greater than or equal to 30 TPY of any combination of pollutants. The existing conveyors and vessel loadout facilities owned by Willis Enterprises are under a separate air permit and already registered with ORCAA.)

¹⁰ Excerpt from EPA-approved SIP rules for ORCAA, 40 C.F.R. part 52.2470(c) Table 6 – Additional Regulations Approved for the Olympic Region Clean Air Agency (ORCAA) Jurisdiction, *available at* <https://www.epa.gov/air-quality-implementation-plans/washington-sip-epa-approved-regulations-table-6-olympic-region>. (Attachment E).

ORCAA Rule 6.1 Notice of Construction Required

(a) Approval of a Notice of Construction (NOC) Application required. It is unlawful for any person to cause or allow the following actions unless a Notice of Construction application has been filed with and approved by the Agency, except for those actions involving stationary sources excluded under Rule 6.1(b) and (c):

- (1) Construction, installation, or establishment of any stationary source;
- (2) Modification to any existing stationary source; or,
- (3) Replacement or substantial alteration of emission control technology installed on an existing stationary source.

¹¹ **ORCAA Rule 6.1.4 Requirements for Approval**

(a) Attainment or Unclassified area requirements. The following requirements apply to any new stationary source or modification proposed in an attainment or unclassified area:

Available Control Technology (“State-BACT”).¹² ORCAA Rule 6.1.4(a)(2) and the Washington State Implementation Plan under 40 C.F.R. part 52.2470(c), Table 6, require a finding that a new source in an attainment area will employ State-BACT for all pollutants not previously emitted. State-BACT is defined in WAC 173-400-030(13) as:¹³

[A]n emission limitation based on the maximum degree of reduction for each air pollutant subject to regulation under chapter 70A.15 RCW emitted from or which results from any new or modified stationary source, which the permitting authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes and available methods, systems, and techniques, including fuel cleaning, clean fuels, or treatment or innovative fuel combustion techniques for control of each pollutant.

Preliminary Determination at 25. Additionally, the emission limitations established through the State-BACT analysis must be met continuously.¹⁴ The State-BACT emission limitation and compliance requirements mirror the Federal-BACT requirements for major sources.¹⁵ *Moreover, while these comments generally focus on the flaws in “State-BACT” requirements, to the extent the proposed pellet mill is a major source for an air pollutant, the “State-BACT” issues are also relevant to the PSD BACT requirements.*

In 2001, EPA explained that it was not necessary to approve the Act’s section 112(g) (case-by-case Maximum Achievable Control Technology (MACT) standards for the 188

(1) The proposed new stationary source or modification will comply with all applicable new source performance standards, national emission standards for hazardous air pollutants, national emission standards for hazardous air pollutants for source categories, emission standards adopted under chapter 70A.15 RCW [Washington Clean Air Act] and applicable emission standards in ORCAA’s Regulations.

(2) The proposed new stationary source or modification will employ BACT for all air pollutants not previously emitted or whose emissions would increase because of the new stationary source or modification. ...

(4) If the proposed project is subject to WAC 173-400-700 through 750 [Review of Major Stationary Sources of Air Pollution, PSD permits] or WAC 173-400-800 through 860 [Major Stationary Source and Major Modification in a Nonattainment Area], Ecology has issued a final permit under those programs.

(5) If the proposed new stationary source or the proposed modification will emit any toxic air pollutants regulated under chapter 173-460 WAC [CONTROLS FOR NEW SOURCES OF TOXIC AIR POLLUTANTS], the stationary source meets all applicable requirements of that program.”

¹³ EPA Approved Regulations in the Washington SIP, *available at* <https://www.epa.gov/sites/default/files/2017-02/documents/sip-wa-approved-regulations-ecology-table2.pdf>. (Attachment F).

¹⁴ See ORCAA Rule 1.4 Definitions. “Emission standard” and “emission limitation” means a requirement established under the FCAA or chapter 70.94 RCW [this chapter of Washington State law was recodified to 70A.15 RCW¹⁴] which limits the quantity, rate, or concentration of emissions of air contaminants on a continuous basis, including any requirement relating to the operation or maintenance of a source to assure *continuous emission reduction* and any design, equipment work practice, or operational standard promulgated under the FCAA or chapter 70.94 RCW.”

¹⁵ WAC 173-400-710(1) adopts the federal definition of BACT by reference; *see also* “WAC 173-400-030 (29) “Emission standard,” “emission limitation” and “emission limit” means a requirement established under the Federal Clean Air Act or chapter 70.94 RCW which limits the quantity, rate, or concentration of emissions of air contaminants on a continuous basis, including any requirement relating to the operation or maintenance of a source to assure continuous emission reduction and any design, equipment work practice, or operational standard promulgated under the federal Clean Air Act or chapter 70.94 RCW.”

hazardous air pollutants) delegation to this local air permitting agency because the Act directly confers on the permitting authority the obligation to implement section 112(g) and to adopt a program which conforms to the requirements of EPA's regulation. Therefore, the permitting authority need not apply for approval under section 112(l) in order to use its own program to implement section 112(g).¹⁶

ORCAA's rules contain the requirements for processing NOC applications and where a proposed project "does not meet the applicable approval requirements in Rule 6.1.3, then a final determination to deny approval and an Order to Deny Construction will be issued..."¹⁷

¹⁶ 66 Fed. Reg. 48,211, 48,212-48,213 (Oct. 19, 2001) ("Additionally, EPA is not delegating the regulations that implement CAA sections 112(g) and 112(j), codified at 40 CFR part 63, subpart B, to Ecology and the four local agencies. EPA recognizes that subpart B need not be delegated under the section 112(l) approval process. When promulgating the regulations implementing CAA section 112(g), EPA stated its view that "the Act directly confers on the permitting authority the obligation to implement section 112(g) and to adopt a program which conforms to the requirements of this rule. Therefore, the permitting authority need not apply for approval under section 112(l) in order to use its own program to implement section 112(g)" (see 61 FR 68397). Similarly, when promulgating the regulations implementing section 112(j), EPA stated its belief that "section 112(l) approvals do not have a great deal of overlap with the section 112(j) provision, because section 112(j) is designed to use the Title V permit process as the primary vehicle for establishing requirements" (see 59 FR 26447). Therefore, state or local agencies implementing the requirements under sections 112(g) and 112(j) do not need approval under section 112(l).")

¹⁷ **ORCAA Rule 6.1.2 Application Processing**

(f) Denial. If the Agency determines that a proposed project subject to approval of an NOC application does not meet the applicable approval requirements in Rule 6.1.3, then a final determination to deny approval and an Order to Deny Construction will be issued and served as provided for in these Regulations. Any Order to Deny Construction must:

- (1)** Be in writing;
- (2)** Set forth the objections in detail regarding the specific law or rule or rules of these Regulations that will not be met by the proposed project; and,
- (3)** Must be signed by the Executive Director of the Agency or an authorized representative.

Table of Contents

I.	The Permit Application is Materially Incomplete.....	10
A.	The Proposed Pellet Mill Must be Classified as a Fuel Conversion Plant under the federal Clean Air Act Major Source Prevention of Significant Deterioration Permit Program.....	10
B.	VOC Emissions from the Five Wood Pellet Storage Silos Are Not Included in the Permit Application.....	15
C.	Carbon Monoxide Emissions from the Five Wood Pellet Storage Silos Are Not Included in the Permit Application.	15
D.	The Permit Application Fails to Include Emissions from and Propose Controls for the VOC and HAP Emissions from the Hammermills.....	16
E.	The Permit Application Includes Woefully Inaccurate Emission Estimates for Hazardous Air Pollutants, Which Must be Revised and a Case-by-Case MACT Analysis Conducted.	17
F.	The Calculations for NOx Emissions Must be Corrected.	18
II.	The Permit Application is Missing Emitting Units and Emission Sources.....	19
A.	The Permit Application Fails to Disclose and Use Accurate Methodology to Estimate NOx Emissions.	19
B.	The Permit Application Does Not Appear to Include NOx Emissions for Several Sources.	20
C.	The Permit Application Fails to Include Maritime Vessel Emissions from the Loadout Area, which is on Adjacent Property That Would Serve the Proposed Pellet Mill.	21
D.	Permit Application Fails to Include Emissions from the Transport of Finished Product from the Five Wood Pellet Silos to the Ship Loadout Area.....	22
E.	The Permit Application Fails to Include Any Emissions for Construction Activities.	22
III.	The Permit Application Fails to Address the Act’s Regional Haze Four-Factor Analysis Requirements.....	23
IV.	The Proposed State-BACT Determinations are Flawed and Incomplete, and the Proposed Emission Limitations Fail to Reflect State-BACT.	23
A.	The Permit Applicant Must Look Beyond a Search of EPA’s RACT/BACT/LAER Clearinghouse Database to Identify State-BACT Control Technologies.....	23
B.	The Proposed NOx Emission Limitations for the Dying Line Do Not Reflect State-BACT Requirements.....	25
C.	It is Unclear Whether the Proposed PM Emission Limitations for Dry Hammer Mills and Pellet Line Meet the State-BACT Requirements.	25
D.	The Proposed Emission Limitations for the Emergency Generator and Fire Pump Engines Do Not Reflect State-BACT Requirements.	26
E.	The Proposed SO ₂ Requirements for the Drying Line Do Not Reflect State-BACT Requirements.....	26

F.	State-BACT Determinations Must be Included for the Missing Emitting Units and Emission Sources.....	26
G.	State-BACT Emission Limitations are Continuous Requirements and All Operating Scenarios Must Have State-BACT Determinations.....	27
V.	The Proposed Conditions of Approval Authorize Bypass of the Air Pollution Controls, Unlawfully Excusing the Proposed Pellet Mill from Continuous Compliance with Case-by-Case Maximum Achievable Control Technology (MACT).....	28
VI.	The Permit Applicant Must Prepare and Submit a Permit Application to the Department of Ecology for PSD BACT for CO and CO ₂ e Emissions.....	29
VII.	The Permit Application Contains Deficient and Inaccurate Ambient Air Modeling.....	29
A.	The Permit Applicant Must Correct the Missing and Inaccurate Information and Rerun the AERMOD Model Using the Current Model Version.....	29
B.	Ambient Air Background Concentration Data Used Does Not Represent Current Conditions.....	30
C.	The Permit Application Fails to Include Modeling Runs for the Range of Operating Conditions.....	31
VIII.	The Draft Approval Order’s Terms and Conditions are Insufficient to Ensure Compliance with the Clean Air Act.....	32
A.	The Final Approval Order Must Contain When and How Often Stack Testing is Required.....	32
B.	The Approval Conditions Must Include Detailed Reporting Requirements.....	34
C.	ORCAA Must Remove the Provisions that Provide for Director’s Discretion.....	35
D.	ORCAA Must Require Implementation of Source-Specific Fugitive Dust Requirements.....	35
E.	The Opacity Monitoring is Not Effective to Detect and Remedy Excess Emissions.....	36
F.	The Proposed Approval Conditions Are Utterly Devoid of a Mechanism to Monitor Facility-Wide Emissions and Compliance with PTE Limits.....	38
IX.	ORCAA Cannot Rely on the Project’s Invalid Determination of Non-Significance to Meet its SEPA Obligations.....	39
A.	Legal Requirements.....	39
B.	The DNS Air Emission Calculations Are Wrong.....	40
C.	The DNS Did Not Disclose and Consider All Climate Impacts From Greenhouse Gas Emissions.....	40
D.	ORCAA Must Deny the NOC Application and Undertake Its Own Full SEPA Review of the Project’s Air Emissions.....	41
	Conclusion	41

I. The Permit Application is Materially Incomplete.

A. The Proposed Pellet Mill Must be Classified as a Fuel Conversion Plant under the federal Clean Air Act Major Source Prevention of Significant Deterioration Permit Program.

The major source Prevention of Significant Deterioration (“PSD”) permit requirements applicable to the proposed pellet plant are found in WAC 173-400-700 through 173-400-860. The State’s PSD requirements, just like federal PSD regulations in 40 C.F.R. § 52.21, adopt by reference the definition of “major stationary source” in 40 C.F.R. § 51.21(b), which contains the list of 28 source categories for which the major source emissions threshold is 100 tons per year (TPY) of any individual regulated new source review (NSR) pollutant.¹⁸ Sources not listed have a major source emissions threshold of 250 TPY. The relevant category on the list of 28 is “fuel conversion plant.” EPA’s regulations do not include a definition of “fuel conversion plant” nor do the State’s.

The permit applicant and ORCAA suggest that wood pellet production is not among the 28 listed categories, and therefore the threshold for PSD applicability is 250 TPY and fugitive emissions are not included for comparison to the major-source threshold.¹⁹ Neither the ORCAA nor the permit applicant provide any discussion or rationale for the assertion that none of 28 categories apply. ORCAA further suggests that “[t]his conclusion will be assured through annual limits.”²⁰ Neither the permit applicant nor ORCAA addressed the question of whether the proposed pellet plant should be considered a “fuel conversion plant” – one of the 28 listed categories – for PSD applicability purposes. As the agency in the State responsible for implementing EPA PSD permit program, Washington must reasonably interpret and apply the PSD regulations. Based on the below analysis, the pellet plant operations (and emissions units) associated with the process change of solidifying the wet woody biomass into pellets constitutes a fuel conversion plant.

Classifying the process of converting wood from one form to another as a process covered by “fuel conversion plants” is consistent with EPA’s statement in the Cleveland Electric memo.²¹ At the plant in question, Cleveland Electric proposed to produce fuel gas by means of gasifying municipal waste. EPA concluded that this process qualified as a fuel conversion plant and made the following statement: “Fuel conversion plants obviously include those plants which accomplish a change in state (e.g., solid to liquid to gas) for a fuel. This definition includes conversion of the following fuels: fossil (e.g., coal or oil shale); biomass (e.g., wood or peat);

¹⁸ WAC 173-400-720(4)(a)(vi).

¹⁹ Permit Application at 6; Permit Application, Appendix A, NOC Application Forms and SEPA Documentation, Form 7, PSD Applicability Form at 3 (“Permit Application, Appendix A”) (Attachment G); Preliminary Determination at 30.

²⁰ *Id.*

²¹ EPA Memorandum from Edward J. Lillis, Chief Permits Programs Branch, AQMD, to George T. Czerniak, Chief Air Enforcement Branch, Region V, Applicability of Prevention of Significant Deterioration (PSD) and New Source Performance Standards (NSPS) to the Cleveland Electric, Incorporated, Plant in Willoughby, Ohio (May 26, 1992), *available at* <https://www.epa.gov/sites/default/files/2015-07/documents/clvlnel.pdf>. (“Cleveland Electric Memo”) (Attachment H).

and anthropogenic (e.g., municipal waste derived fuel and inorganic fuel). The majority of such sources are likely to accomplish these changes through either gasification, liquefaction, or solidification. . . . Generally, however, applicability for this source category is determined by whether a facility changes state (e.g., solid to gas) or form (e.g., process sawdust into a pellet) of a fuel”²² and the change is permanent, not temporary.²³

The proposed wood pellet mill is a “fuel conversion plant” under the PSD regulations. First, the proposed processes at the wood pellet mill would convert the wet raw wood material to a solid form, the pellets, which changes the state of the wood.²⁴ Moreover, in the drying line, natural gas, diesel, and propane are used as fuels for the furnace and hog fuel (wood bark) would be burned to produce energy for drying the wet raw wood material. Natural gas would be burned for RTO. The RCO for the four dry hammer mills and pellet coolers would burn natural gas. The essential features of the pellet mill use a process and change material from a wet, raw material to a solid form. The solidification processes that would be used to create the pellets also would use natural gas, diesel, and propane to start the furnace process, wood to fuel the furnace, and natural gas to power the control air pollution emissions at the RTO and RCO.

This interpretation is also consistent with EPA’s statements in its July 31, 2003 letter.²⁵ In that analysis, while EPA communicated that the change in state in that instance was from a liquid to a gas, it concluded that the plant at issue was not a fuel conversion plant because the vaporization of liquid natural gas occurs without the need for chemical or process change. The permit applicant’s process here of converting wet woody biomass to a solid form – the wood pellets – would not occur without a process, such as that proposed by the permit applicant. Moreover, in the 2003 letter, EPA provided a list of the types of fuel conversion plants under the

²² *Id.* at 3.

²³ EPA Letter from C.J. Sheehan, Office of Regional Counsel, EPA Region 6 to M. Cathey, Managing Director, El Paso Energy Bridge Gulf of Mexico (Oct. 28, 2003), *available at* <https://www.epa.gov/sites/default/files/2015-07/documents/20031028.pdf>. (Attachment I).

²⁴ *See* EPA Memorandum from Kent Berry, Director Policy Analysis Staff, U.S. EPA, to Asa B. Foster, Jr., Director, Air and Hazardous Materials Division, U.S. EPA Region IV, “Clarification of Sources Subject to Prevention of Significant Deterioration (PSD) Review” at 1 (Jan. 20, 1976), *available at* <https://www.epa.gov/sites/default/files/2015-07/documents/phosphat.pdf> (Explaining that “Fuel conversion plants are defined for purposes of PSD as those plants which accomplish a change in state for a given fossil fuel. The large majority of these plants are likely to accomplish these changes through coal gasification, coal liquefaction, or oil shale processing.”) (Attachment J). Notably, EPA Memorandum did not say “all” of the fuel conversion plants accomplish the changes through the examples provided.); *see also* “Cleveland Electric Memo”, at 3, (“The production of low heat value fuel gas at the Cleveland Electric facility also classifies the source as a fuel conversion plant. Fuel conversion plants obviously include those plants which accomplish a change in state (e.g., solid to liquid to gas) for a fuel. This definition includes conversion of the following fuels: fossil (e.g., coal or oil shale); biomass (e.g., wood or peat); and anthropogenic (e.g., municipal waste derived fuel and inorganic fuel). The majority of such sources are likely to accomplish these changes through either gasification, liquefaction, or solidification. The category of fuel conversion plants may include, but is not limited to, some types of sources within standard industrial classifications 1311, 2819, 2969, 2421, and 2999. Generally, however, applicability for this source category is determined by whether a facility changes the state (e.g., solid to gas) or form (e.g., process sawdust into a pellet) of a fuel. Therefore, the Cleveland Electric facility fits into the fuel conversion plant category as well.”)

²⁵ EPA Memorandum from Racqueline Shelton, Group Leader, Integrated Implementation Group, to Guy Donaldson, Acting Chief, Air Permits Section, EPA Region 6, Request for Guidance on the Definition of Fuel Conversion Plants for Purposes of Prevention of Significant Deterioration (PSD) (July 31, 2003), *available at* <https://www.epa.gov/nsr/guidance-definition-fuel-conversion-plants>. (Attachment K).

PSD regulations and the list included “coal gasification, oil shale processing, conversion of municipal waste to fuel gas, processing of sawdust into pellets.”²⁶

The legislative history regarding the addition of “fuel conversion plant” to the definition of “major emitting facilities” shows that EPA recommended adding fuel conversion plants when the source category was added as one of the 100 TPY major source categories in the Clean Air Act Amendments of 1977. Yet the amendments did not include a definition for this source category. Rather, the legislative history made a one passing reference to the coal gasification, coal liquefaction, and oil share processing “etc.” to provide examples of the types of facilities that would be included.²⁷

Wood is a type of fuel used in a wide variety of stationary source combustion activities. For example, the 1977 legislative history shows that when EPA reported to congress in how it collected emission inventory information from combustion activities at stationary sources, air pollutant emissions were reported by the type of fuel used in different applications.²⁸ Indeed, the use of wood as a fuel was included as a category for which emission inventory information was reported to EPA in all three areas of the stationary source combustion activities (residential, commercial and institutional, and industrial). Additionally, when the National Academy of Sciences provided its Report to congress during the 1977 legislative session, it explained that

²⁶ *Id.* at 1-2.

²⁷ The legislative history is also instructive in considering whether the proposed wood pellet mill should be classified as a “fuel conversion plant.” In August 1977, Congress adopted the Clean Air Act Amendments of 1977 with the statutory PSD section. The 1977 amendments included the PSD 100 TPY / 250 TPY two-tier concept in the definition of “major emitting facilities” along with a list of the source categories having a 100-TPY PSD major source threshold. EPA developed a list of 19 source categories to include in the list of sources subject to the 100-TPY threshold and EPA’s list was an extract from the Research Corp. of New England, which had listed 190 types of sources. The “committee took 28, be printed in the RECORD at this point as an illustration of what the committee examined and the kinds of sources the committee intended to include and exclude...” 1976 WL 162302 (CAA77), 18, A&P 122 Cong. Record S12775, S12782] 1977 WL 173804 (CAA77), 1977 WL 173804 (CAA77), 20 (Aug. 2, 1976). Of the categories listed, 17 that were covered by EPA’s regulation included the largest emitters of SO₂ and TSP on a nationwide basis at that time. The legislative history explains that the “fuel conversion plants, are fuel conversion plants (coal gasification and liquefaction, oil shale processing, etc.) were included due to their significant growth potential...” 1977 WL 173804 (CAA77), 20 (Aug. 2, 1976), citing *Technical Support Document--EPA Regulations for Preventing the Significant Deterioration of Air Quality*, U.S. Environmental Protection Agency, Office of Air Quality Planning & Standards (Jan. 1975), at 27-28.; The listed categories included fuel conversion plants, but without any definition of the term. 42 U.S.C. § 7479(1). Pub.L. 95-95, Title I, § 127(a), Aug. 7, 1977, 91 Stat. 740.

²⁸ The legislative history includes two citations to the EPA Federal Register notice summarizing emission inventory data for fuel used in residential, commercial and institutional, and industrial applications. In all three applications, one of the types of fuel identified was “wood” (For the types of fuel used in residential applications, and commercial and institutional, EPA’s emission inventory included: Anthracite Coal, Bituminous Coal, Distillate Oil, Residual Oil, Natural Gas, Wood, and Other. For the types of fuel used in industrial applications, EPA’s emission inventory included: Anthracite Coal, Bituminous Coal, Coke, Distillate Oil, Residual Oil, Natural Gas, Wood, and Other.); 1971 WL 120521 (CAA77), 24, A&P CAA77 HEARINGS (20) (Part 7 OF 7), 514, citing APPENDIX D. (POLLUTANT) EMISSIONS INVENTORY SUMMARY, (EXAMPLE REGIONS AND WHERE EMISSION LIMITATIONS ARE DEVELOPED) _____ AIR QUALITY CONTROL REGION--DATA REPRESENTATIVE OF CALENDAR YEAR; *see also* 1972 WL 121321 (CAA77), 62, A&P CAA77 HEARINGS (27B) (Part 6 OF 6), 883, citing FEDERAL REGISTER, VOL. 36, NO. 158-AUG. 14, 1971, Appendix D--(Pollutant) Emissions Inventory Summary, tons/yr. (or metric tons/yr.) (Example Regions) _____ Air Quality Control Region Data Representative of Calendar Year _____.” (emphasis added).

“[t]he primary emissions for stationary sources are from fuel combustion” and included in the list of fuels used during combustion was “wood waste.”²⁹ From the 1977 legislative history it is clear that “wood” and “wood waste” were considered a type of fuel.

Furthermore, it appears the only location in the 1977 legislative history where “fuel conversion plants” were referred to “fossil fuel conversion plants” was in testimony discussing the then “shortages in low-sulfur liquid fuel” and because of the shortages a particular category of conversion plants had “become increasingly dependent on coal to generate electricity.”³⁰ Thus, it logically follows that in addition to the examples of “coal gasification,” “coal liquefaction” and “oil shale processing” that fuel conversion plants must also include other sources used for fuel, notably wood.

Congress explicitly identified the major source category relevant here in the definition of “major emitting facility” as “fuel conversion plant.” The major source category was neither identified as fossil fuel conversion plants nor is there anything in the legislative history to suggest congress intended that the category include only those plants that convert fossil fuels.³¹

Since EPA’s proposed PSD regulations in 1973, to the list of source categories that is used today, the “fuel conversion plant” category has never been defined.³² This list (still without

²⁹ AIR QUALITY AND AUTOMOBILE EMISSION CONTROL REPORT BY THE COORDINATING COMMITTEE ON AIR QUALITY STUDIES NATIONAL ACADEMY OF SCIENCES NATIONAL ACADEMY OF ENGINEERING PREPARED FOR THE COMMITTEE ON PUBLIC WORKS UNITED STATES SENATE PURSUANT TO S. Res. 135, APPROVED AUGUST 2, 1973, VOLUME 3, THE RELATIONSHIP OF EMISSIONS TO AMBIENT AIR QUALITY, SEPTEMBER 1974, SERIAL NO. 93-24, COMMITTEE ON PUBLIC WORKS," 1974 WL 162630 (CAA77), 70, A&P CAA77 COMM. PRINT 1974 (13D) (Part 3 OF 6), 17-18. (In addition to wood waste, the Academy’s Report listed the following fuels: coal, fuel oil, natural gas, and liquified petroleum gas.)

³⁰ JOHN KRAUTKRAEMER, TESTIMONY OF THE ENVIRONMENTAL DEFENSE FUND AND THE COLORADO OPEN SPACE COUNCIL ON THE PREVENTION OF SIGNIFICANT DETERIORATION OF AIR QUALITY BEFORE THE SUBCOMMITTEE ON ENVIRONMENTAL POLLUTION OF THE SENATE COMMITTEE ON PUBLIC WORKS Denver, Colorado, February 15, 1977, 1977 WL 173812 (CAA77), 3; also cited at 1977 WL 173811 (CAA77), 111.

³¹ Interpretations of the regulation that have limited fuel conversion plants to only those that convert “fossil” fuel are unreasonably restrictive; *see e.g. see generally* EPA Letter from Gregg M. Worley, Chief Air Permits Section, EPA Region 4, to E.A. Veronica Barringer, Bureau of Air Quality, South Carolina Department of Health and Environmental Services, (June 4, 2007) *available at* <https://www.epa.gov/sites/default/files/2015-07/documents/fuelcon2.pdf>. (Attachment L); *see also* EPA Letter from Donald Dossett, P.E., Manager Stationary Source Unit, EPA Region 10, to Claudia Davis, Western Region Air Quality Manager, Oregon Department of Environmental Quality (Sept. 26, 2017), *available at* <https://www.epa.gov/sites/default/files/2017-10/documents/jordcove.pdf>. (Attachment M).

³² When EPA added the term “major stationary source” to its PSD regulations it adopted the source categories from the Act, it did not add definitions. Prior to 1977 amendments to the Clean Air Act, EPA’s 1973 proposed PSD regulations listed 16 source categories, that list did not include fuel conversion plants. 38 Fed. Reg. 18,986 (July 16, 1973). EPA’s 1974’s preamble that proposed amendments to PSD regulations mentioned that the list of sources subject to the permit program had been expanded to include the “fuel conversion plants” and noted that that source type include sources “such as coal gasification and oil shale plants.” 39 Fed. Reg. 31,000, 31,003 (Aug. 27, 1974). EPA’s statement was in a proposed action and thus not a final agency action. Furthermore, EPA’s 1974 preamble statement “such as” merely provided examples of the types of sources that could be included as fuel conversion plants, it was neither limiting the types of fuel covered nor a definition. EPA promulgated the first set of PSD regulations in 1974 and these regulations contained “fuel conversion plants” as a listed source category but EPA did

a definition for fuel plant conversion) remains in current federal PSD regulated and is adopted by reference in the current Washington State PSD regulations.

ORCAA does not have authority to interpret and implement the PSD regulations. The PSD regulations applicable to wood pellet plant are in the SIP regulations that EPA approved for the Washington Department of Ecology to implement.³³ The PSD regulations are not part of ORCAA's EPA-approved SIP regulations. Notably, ORCAA Rule 1.4 explicitly explains that the local permitting agency does not have authority to implement the PSD regulations:

"Prevention of Significant Deterioration (PSD)" means the program in WAC 173-400-700 to 173-400-750. Ecology is responsible for the PSD program for stationary sources in ORCAA's jurisdiction.

Instead, the PSD regulations fall under the Washington Department of Ecology's jurisdiction. Thus, ORCAA does not have authority to interpret the PSD regulations and answer the question of whether the proposed plant is a "fuel conversion plant." Furthermore, as discussed below, several of the regulated NSR pollutants exceed the 100 TPY threshold and at least one exceeds the 250 TPY threshold. Therefore, the permit applicant must seek a PSD permit from the State for this major stationary source under either the 100 or 250 TPY threshold. If ORCAA attempts to create emission limitations and associated monitoring, recordkeeping and reporting requirements to allow the proposed pellet mill to escape major source PSD permitting, ORCAA must nevertheless defer to the State in responding to this significant question raised during the public comment period of whether the proposed pellet mill constitutes a "fuel conversion plant." The State's proposed determination must be subject to the State's notice and comment process.

In addition to ORCAA's mischaracterization of the proposed pellet mill, as discussed below, the proposed approval order terms are not adequate to create synthetic minor emission limits and fail to include the required monitoring, recordkeeping and reporting requirements necessary for practical enforceability. Moreover, the permit applicant has not accurately calculated many of the air pollutants, including carbon monoxide ("CO") emissions. Using the correct emission factor from the stack test at another wood pellet mill, the potential criteria pollutant CO emissions exceed the 250 TPY PSD thresholds. Additionally, applying the 100 TPY PSD threshold, PM, NO_x and VOC would be triggered for PSD review, along with greenhouse gases. ORCAA must deny the permit application. The permit applicant must apply to Washington for a PSD permit.

In summary, ORCAA lacks authority to consider and respond to this comment. It must defer to the State of Washington. Based on the above analysis the proposed wood pellet plant must be classified as a fuel conversion plant because the proposed wood pellet plant would be a process to solidify the wet woody biomass to the solid pellet form.

not define the term. 39 Fed. Reg. 42,510, 45,516 (Dec. 5, 1974). In 1978, EPA promulgated the PSD regulations, which were pursuant to the Clean Air Act Amendments of 1977, and subsequently amended them in August 1980 in response to *Alabama Power Company v. Costle*, 636 F.2d 323 (D.C. Cir. 1979). The 1980 PSD regulations contained the 100-tpy source category list with fuel conversion plants as one of the categories but without a definition.

³³ WAC 173-400-700 to 173-400-750, *supra* n.13.

B. VOC Emissions from the Five Wood Pellet Storage Silos Are Not Included in the Permit Application.

The permit application does not include any VOC emissions from the silos that will store wood pellets. Thus, the permit application's State-BACT analysis ignores VOC emissions from the storage silos,³⁴ does not establish a State-BACT emission limit, and underestimates the proposed pellet mill's true potential to emit of VOCs. This is in contrast to existing source testing for wood pellet storage silos, conducted by the State of Georgia at the Georgia Biomass wood pellet plant.³⁵ The State of Georgia permitting agency, Georgia Environmental Protection Division ("Georgia EPD") formulated an emission factor for wood pellet storage and handling of 0.4 lb/ oven dried tons (ODT), which the agency requires wood pellet plants to use in calculating PTE, with limited recent exception.³⁶ This emission factor is based on direct emissions testing of the wood pellet storage silos at Georgia Biomass, an 825,000 TPY wood pellet plant located in Waycross, Georgia.³⁷ Based on the Georgia EPD emission factor, an additional 88 TPY of VOC emissions must be added to the proposed pellet mill's facility-wide emission inventory for the emissions from the five pellet silos (EP-10, EP-11, EP-12, EP-13 and EP-14), a State-BACT analysis conducted, and an emission limit established for the VOC emissions from the five pellet storage silos.³⁸ Thus, the revised estimate of facility-wide VOC should be 155 TPY. If the permit applicant wishes to use a lower emission factor, it can only do so after providing adequate justification, supported by credible evidence, demonstrating that the planned silos are not capable of emitting at the same rate as those tested at Georgia Biomass.

C. Carbon Monoxide Emissions from the Five Wood Pellet Storage Silos Are Not Included in the Permit Application.

According to the permit application, the proposed pellet mill's five pellet storage silos will not emit any carbon monoxide (CO).³⁹ This conclusion, however, contradicts numerous studies conducted over the past decade demonstrating that bulk storage of wood pellets is a significant source of CO emissions.⁴⁰ Tragically, numerous real-world incidents have confirmed

³⁴ Permit Application at 23.

³⁵ Georgia EPD Memorandum re: Emission Factors for Wood Pellet Manufacturing (Jan. 29, 2013) (Attachment N) ("Georgia EPA Memo").

³⁶ *Id.* at 4; *see also* Georgia EPD, SIP Construction Permit and Title V Significant Modification Application Review for Hazlehurst Wood Pellets, at 5 (Sept. 2019) (explaining why Georgia EPD was making an exception to its normal requirement to utilize the 0.4 lb/ODT emission factor). (Attachment O).

³⁷ Georgia EPA Memo, *supra* n.35, at 5.

³⁸ Silo emissions, (440,800 ODT/yr * 0.4 lb/ODT) / 2,000 = 88 TPY VOC.

³⁹ Permit Application, Appendix C, Emission Calculations, at PDF 3. (Attachment P). ("Permit Application, Appendix C").

⁴⁰ Urban R. A. Svedberg, *et al.*, *Emissions of Hexanal and Carbon Monoxide from Storage of Wood Pellets, a Potential Occupational and Domestic Health Hazard*, 48 Ann. Occup. Hyg., No. 4, 339-349 (2004) (Attachment Q); Lydia Soto-Garcia, *et al.*, *Exposures to Carbon Monoxide from Off-Gassing of Bulk Stored Wood Pellets*, Center for Air Resources Engineering and Science, Clarkson University, Energy Fuels, 29, 218-226 (2015) (Attachment R); Mohamad Arifur Rahman, *et al.*, *Carbon Monoxide Off-Gassing From Bags of Wood Pellets*, 62 Annals of Work Exposures and Health, Issue 2, 248-252 (Dec. 25, 2017) (Attachment S) ("Rahman, *et al.*"); Jaya Shankar Tumuluru, *et al.*, *Analysis on Storage Off-Gas Emissions From Woody, Herbaceous, and Torrefied Biomass*, 8 Energies 1745, 1751 (March 2, 2015) (Attachment T); Xingya Kuang, *et al.*, *Rate and Peak Concentrations of Off-Gas Emissions in Stored Wood Pellets—Sensitivities to Temperature, Relative Humidity, and Headspace*, 53 Ann. Occup. Hyg., No. 8,

this, with at least 14 fatal accidents due to carbon monoxide poisoning from bulk wood pellet storage since 2002.⁴¹ The danger is so high that the New York State Department of Health has recommended that “signs should be posted at [wood pellet] storage areas to warn everyone about potential carbon monoxide hazards.”⁴²

Most critically, in terms of an emission factor, one study found that softwood pellets stored at 35° C (95° F) for two days had an emission factor of approximately 0.7 g/kg, which equates to 1.4 lb/ton of pellets.⁴³ This emission factor produces an emission rate at the proposed pellet mill of 308 tons of CO per year, well over either of PSD major-source thresholds (100 or 250) TPY. Wood pellets stored in silos frequently reach and maintain temperatures well above 35° C even when ambient temperatures are much lower, meaning this emission factor is likely applicable nearly year-round.

The additional CO emissions of 308 TPY must be added to the proposed pellet mill’s facility-wide emission inventory estimate for CO of 185 TPY, a major source PSD BACT analysis conducted, a permit application submitted to the Washington Department of Ecology, and either an emission limit established by Washington Department of Ecology for the CO emissions from the five pellet storage silos or an approval order denial issued. Because ORCAA does not have authority to act on sources with potential to emit at levels subject to the major source PSD regulations, it must defer to the Washington Department of Ecology’s determination for the CO emissions from the proposed pellet mill.

D. The Permit Application Fails to Include Emissions from and Propose Controls for the VOC and HAP Emissions from the Hammermills.

As discussed in the letter from SELC, the permit applicant proposes to operate wet (aka green) hammermills that will not be vented to any VOC controls.⁴⁴ Moreover, the permit applicant improperly listed these hammermills as not emitting any VOCs or HAPs. Most comparable wood pellet mills vent these units to the furnace or dryer RTO for VOC and HAP control. Furthermore, emission stack tests on uncontrolled wet hammermills⁴⁵ show the proposed wet hammermills will likely emit up to 60 tons of VOCs and six tons of HAPs (in addition to the emission rates calculated elsewhere in these comments). These emissions and controls must be included in a revised permit application.

789-796 (Aug. 5, 2009) (Attachment U) (“Kuang”); Wolfgang Stelte, Danish Technological Institute, *Guideline: Storage and Handling of Wood Pellets*, at 6 (Dec. 2012) (Attachment V) (“Stelte”).

⁴¹ Rahman, *et al.*, *supra* n.40, at 1.

⁴² New York State Department of Health, Carbon Monoxide (CO) Hazards from Wood Pellet Storage, *available at* https://www.health.ny.gov/environmental/emergency/weather/carbon_monoxide/docs/pellets.pdf. (Attachment W).

⁴³ (440,800 ODT/yr * 1.4 lb/ton) / 2,000 lbs = 308 tpy CO; *see also* Kuang, *supra* n.40 at 792.

⁴⁴ Letter from Patrick J. Anderson, Southern Environmental Center, Heather Hillaker, Southern Environmental Law Center, to Lauren Whybrew, ORCAA, “Hazardous Air Pollutant (HAP) Deficiencies in Preliminary Determination for Pacific Northwest Renewable Energy LLC (PNWRE),” (Jan. 8, 2024). (Attachment X). (“SELC Letter”).

⁴⁵ Enviva Pellets Wiggins, LLC, Air Emission Test Report (Oct. 31, 2013) (Attachment Y); Enviva Pellets Amory, LLC, Air Emission Test Report (Oct. 31, 2013) (Attachment Z).

E. The Permit Application Includes Woefully Inaccurate Emission Estimates for Hazardous Air Pollutants, Which Must be Revised and a Case-by-Case MACT Analysis Conducted.

As discussed in the comment letter submitted from SELC to ORCAA,⁴⁶ the permit application estimates plant-wide hazardous air pollutants (“HAP”) at 1.32 TPY,⁴⁷ relying on EPA AP-42 emission factors that are specific to wood pellet plants and other inappropriate emission factors. This estimate is woefully inaccurate. The HAP pollutant emissions are of concern to NPCA not only because of the potential adverse impacts to the adjacent residential community and nearby elementary, middle and high schools (the proposed pellet mill is within a mile and a half of Emerson elementary school, Hoquiam middle school and Hoquiam high school), but because the HAPs that would be emitted at the greatest quantities by the proposed pellet mill are also characterized as VOCs. By volume, the most significant HAPs emitted are all also VOCs, and include the following:

- Acrolein
- Acetaldehyde
- Formaldehyde
- Methanol
- Phenol
- Propionaldehyde

These particular VOC pollutants impact regional haze at the National Parks. Moreover, the National Park Service expresses concerns regarding the impacts of air toxic pollution at Mount Rainier National Park.⁴⁸

Reliance on emissions factors is problematic because the EPA AP-42 emission factors do not reliably predict emissions from specific sources and should not be used to establish or demonstrate compliance with approval order limits. The emission factors were developed to provide *approximations* of average emissions from certain kinds of activities and equipment and were not intended to be used for permitting and enforcement.⁴⁹ Consequently, EPA has repeatedly cautioned that the AP-42 factors “are not likely to be accurate” and thus “[u]se of these factors as source-specific permit limits ... is not recommended by EPA.”⁵⁰

⁴⁶ SELC Letter.

⁴⁷ Permit Application, Appendix C at PDF 4.

⁴⁸ See *supra* n.5.

⁴⁹ EPA, A-42, available at https://www.epa.gov/system/files/documents/2024-01/introduction_2024.pdf. EPA explains that an AP-42 emission factor is “a representative value that attempts to relate the quantity of a pollutant released to the atmosphere with an activity associated with the release of that pollutant. These factors are usually expressed as the mass of the pollutant divided by a unit mass, volume, distance, or duration of the activity emitting the pollutant (e.g., kilograms of particulate matter emitted per megagram of coal burned). Such factors facilitate estimation of emissions from various sources of air pollution. In most cases, these factors are simply averages of all available data of acceptable quality, and are generally assumed to be representative of long-term averages for all facilities in the source category (i.e., a population average).” AP-42 (2024), Introduction at 1 (underlining in original), available at <https://www.epa.gov/sites/default/files/2020-09/documents/c00s00.pdf>.

⁵⁰ EPA, Reminder About Inappropriate Use of AP-42 Emission Factors, Publication No. EPA 325-N-20-001 at 1, (Nov. 2020) (“EPA AP-42 Enforcement Alert”), available at <https://www.epa.gov/sites/default/files/2021-01/documents/ap42-enforcementalert.pdf>.

The recent permit application for a proposed pellet mill in Longview (“Proposed Longview Pellet Mill”) of similar size (450,00 oven dry metric tons (ODMT)/yr) submitted to Washington’s Southwest Clean Air Agency includes a plant-wide HAP emission inventory of 48.90 TPY for all HAPs, and 22.55 TPY for the maximum of a single HAP.⁵¹ The Proposed Longview Pellet Mill application explains that “HAP/TAP [toxic air pollutants under State law]⁵² and VOC emissions from the hammermills and pelletizers were updated [in the permit application] to use stack test data from a representative site, the ABE Facility in Gloster, MS.”⁵³ The permit applicant further explained that it used “HAP/TAP emissions from the dryer use stack test data from the ABE Facility to supplement the AP-42 factors used in the Application.” Furthermore, the permit applicant added “[a] safety factor of 25% ... to the emission factors for conservatism ... [all of which] ... resulted in additional HAP/TAP being included in the emission calculations.”⁵⁴

The permit applicant for the proposed pellet mill must supplement its permit application with accurate HAP/TAP and VOC emission calculations, following the methodology used at the Proposed Longview Pellet Mill. Once the emission estimates are updated, the proposed pellet mill must be classified as a major source of HAPs under the federal Clean Air Act. The permit applicant must conduct the case-by-case MACT analysis required under the federal Clean Air Act. The permit applicant must also use the corrected emission inventory of TAP emissions rerun the TAP model analysis required by State law.⁵⁵

F. The Calculations for NOx Emissions Must be Corrected.

The permit applicant erred in calculating the emission factor for NOx for the furnace emissions estimated for drying line emissions based on 52 lbs/hour for total PTE of 227.8 TPY.⁵⁶ This emission factor is based on the amount of wood in the dryer. This is improper; NOx is a product of combustion, and therefore the amount of wood being dried is not directly correlated to NOx emissions. In terms of the Enviva Greenwood testing,⁵⁷ the wood pellet furnace there operated at an average heat input of 135 MMBtu/hr during the testing,⁵⁸ and emitted NOx at a rate of 18.5 lb/hr.⁵⁹ Based on the emission testing at the Enviva Greenwood pellet mill, the proper emission factor therefore is 0.137 lb/MMBtu, not the 52 lbs/hour suggested by the permit applicant.

⁵¹ Letter from Jennifer Pohlman, Senior Consultant, Trinity Consultants, to Danny Phipps, Air Quality Engineer 1, Southwest Clean Air Agency, Completeness Determination for ADP Application CO-1057 dated August 25, 2022 (March 29, 2022) at PDF 18. (Attachment AA). (“SWCAA Letter”).

⁵² Preliminary Determination at 28 (“The Air Toxics Rule provides a multi-tiered, screening approach under WAC 173-460-080 to assess health impacts and demonstrate compliance with the ambient impact requirement under WAC 173-460-070, which is that TAP increases must be sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects.”)

⁵³ SWCAA Letter at PDF 2.

⁵⁴ SWCAA Letter at PDF 2.

⁵⁵ Preliminary Determination at 2, 28-30.

⁵⁶ Permit Application, Appendix C, Table C-8a at PDF 14.

⁵⁷ Air Control Techniques, Air Emissions Test Report for Enviva Pellets Greenwood, at 20 (April 4, 2019) (Attachment BB) (“Enviva Greenwood Test Report”).

⁵⁸ *Id.* at Appendix IG: Process Data, Table 4 at 212.

⁵⁹ *Id.* at 20.

The Preliminary Determination explains that the furnace will combust hog fuel to provide heat for the dryer and will have a maximum heat input capacity of 164.81 MMBtu/hr,⁶⁰ and the conditions of approval allow for heat rate at the furnace of 165 MMBtu/hr.⁶¹ Based on the heat input, the furnace at the proposed pellet mill will emit 113 TPY of NOx.⁶² The permit applicant must include all sources of NOx (*i.e.*, Regenerative Catalytic Oxidizer (“RCO”) emissions from the dry hammermill and pellet cooler (5.8 MMBtu/hr gas consumption⁶³), Regenerative Thermal Oxidizer (“RTO”) emissions (20.2 MMBtu/hr gas consumption⁶⁴), all emergency engines (e.g., emergency generators and fire water pumps), the marine vessels, and any other combustion sources not yet disclosed (e.g., propane vaporizer) at the proposed pellet mill and recalculate the total TPY of NOx.

II. The Permit Application is Missing Emitting Units and Emission Sources.

Once the missing emission units are added and the emission estimates corrected, ORCAA must re-evaluate applicability of the Act’s requirements. Once emissions from the missing emission units are added and the emission estimates corrected, ORCAA must evaluate applicability of the Act’s requirements, as well as whether the proposed pellet mill exceeds major source thresholds. ORCAA must provide the public with an opportunity to review and comment on the new information, or, if the proposed pellet mill exceeds major source thresholds, defer permitting authority to the Washington Department of Ecology.

A. The Permit Application Fails to Disclose and Use Accurate Methodology to Estimate NOx Emissions.

Proposed potential facility-wide NOx emissions are projected at 230 TPY from three emission units:

- Drying line (EP-04) (227.76 TPY)
- Emergency generator (GEN-01) (0.17 TPY)
- RCO at the dry hammer mill and pellet cooler (EP-08) (1.82 TPY)⁶⁵

This projection is of concern because it is close to the threshold for PSD major source permitting, which is 250 TPY. The permit application fails to provide the supporting documentation necessary for the public to review and comment on the emission estimate for the drying line. For the projected 227.76 TPY from the drying line, the permit application indicates

⁶⁰ Preliminary Determination at 7.

⁶¹ *Id.* at 33, (Recommended Conditions of Approval ¶ 2).

⁶² We calculate this as follows: (0.137 lb/MMBtu * 1,650,000 MMBtu/year) / 2000 lbs/ton = 113 TPY of NOx from the furnace, while the remainder of known emissions from the proposed pellet mill would emit 17 TPY NOx (0.137 lb/MMBtu * (58,000 MMBtu/hr RCO + 20,200 MMBtu/hr RTO), for a total of 130 TPY NOx. This facility-wide NOx emission estimate does not include emissions from the emergency engines (because it appears the permit applicant did not include all the engines and did not use the BACT assumptions) and the permit applicant did not include NOx emissions from the marine vessels.

⁶³ Preliminary Determination, at 34, (Recommended Conditions of Approval ¶ 2).

⁶⁴ Preliminary Determination, at 33, (Recommended Conditions of Approval ¶ 2).

⁶⁵ Permit Application, Appendix C, Table C-1 at PDF 3.

that the “[e]mission rates are based on vendor data,”⁶⁶ however, there is neither a citation to where that vendor data can be located in the application nor does our review of the application find any vendor data. The public must be provided access to the “vendor data” in order to review and comment. The permit applicant must supplement the application with this missing information so that the public can fully evaluate the accuracy of the potential to emit estimate.

For emissions from the emergency generator, the permit application indicates that emissions are based on “EPA Tier 3 emission standards.”⁶⁷ As discussed below, the Tier 3 engines are not representative of BACT controls.

Finally, the permit application explains that the projected emissions of 1.82 TPY NO_x from the RCO at the dry hammer mill and pellet cooler were estimated based on EPA’s AP-42 emission factors,⁶⁸ and the application used the emission factor for “Residential Furnaces” to estimate these emissions. The RCO is not a residential furnace, and the permit applicant does not explain why this generic emission factor for residential emission units is representative of emissions from the units at the proposed pellet mill. Furthermore, as discussed above, the permit applicant’s reliance on emissions factors is problematic because AP-42 emission factors do not reliably predict emissions from specific sources and should not be used to establish or demonstrate compliance with approval order limits. EPA’s 2020 Enforcement Alert further explained AP-42 emission factors should not be used to establish or determine compliance with source-specific emission limits because of impacts to 1-hour and short-term National Ambient Air Quality Standards (NAAQS).⁶⁹

B. The Permit Application Does Not Appear to Include NO_x Emissions for Several Sources.

The permit application does not appear to include estimates for NO_x emissions from the combustion of gas in the estimates for the Dryer RTO.⁷⁰ Notably the emission estimates for those emission units include break-out tables for other pollutants that are created from combustions of gas (SO₂ and N₂O), however, NO_x emissions are not identified and included in those tables. NO_x emissions from combustion of gas must be added or the permit applicant must explain how they are included in the overall total estimate.

⁶⁶ Permit Application, Appendix C, Table C-8a at PDF 14.

⁶⁷ Permit Application, Appendix C, Table C-12a at PDF 21.

⁶⁸ Permit Application, Appendix C, Table C-9a at PDF 17 (“Combustion emission factors are from AP-42, Table 1.4-1, No SCC – Uncontrolled, 7/98, and Table 1.2-2”).

⁶⁹ EPA, AP-42 Enforcement Alert at 1-2. (“With the advent of 1-hour and short-term National Ambient Air Quality Standards (NAAQS), permit limits must be able to account for short term fluctuations. AP-42 emission factors also do not account for short term variation in emissions as the emission factors are intended for use in developing area-wide annual or triannual inventories. In developing emission factors, test data are typically taken from normal operating conditions and generally avoid conditions that can cause short-term fluctuations in emissions. These short-term fluctuations in emissions can stem from variations in process conditions, control device conditions, raw materials, ambient conditions, or other similar factors. This means that if facilities use AP-42 emission factors as permit limits, facilities increase their chances of violating their short-term permit limits. It also increases the likelihood of a geographic area’s noncompliance with the NAAQS.”)

⁷⁰ Permit Application, Appendix C, at Table C-8a at PDF 14 (does not indicate if NO_x emissions from gas combustions are included).

Furthermore, the permit applicant indicates that diesel engines will power the emergency fire pump,⁷¹ however, there are no emission estimates for these engines identified in the permit application. In contrast, the permit application for the Longview Pellet Mill expressly includes NOx emissions from the engines that will support the fire pumps.⁷² The missing information must be clarified, and emission estimates added as necessary.

C. The Permit Application Fails to Include Maritime Vessel Emissions from the Loadout Area, which is on Adjacent Property That Would Serve the Proposed Pellet Mill.

The permit applicant proposes to draw finished wood pellets from the storage silos and transport them via enclosed conveyor to the adjacent property owned by another company, Willis Enterprises. Once the wood pellets are on Willis Enterprises' property, the wood pellets would be moved via that company's existing conveyors and marine vessel loadout facilities.⁷³ Loadout of the wood pellet product is primarily planned to occur at the ship loadout facility on the adjacent owner's property.⁷⁴ The permit applicant explains that "[t]he Project would increase vessel traffic by approximately one ship every 5 to 6 weeks, or 10 per year." Emissions from vessels at berth ("dockside") that would load the wood pellets for transport⁷⁵ are considered primary emissions for estimating facility-wide emissions for applicability of the Clean Air Act requirements⁷⁶ because they are maritime emissions from operations related to the "ship loadout

⁷¹ The Vendor Information provided in Appendix D, expressly notes that unless expressly mentioned certain parts and services are not included in the quote, these items include "water pumps." Permit Application, Appendix D, Vendor Information at 70. ("Permit Application, Appendix D"). (Attachment CC). However, Appendix A indicates that the proposed pellet plant would include fire water pumps and generators. ("Stationary sources of diesel particulate matter (DPM) would be emitted at rates greater than regulatory *de minimis* levels by the emergency generator and diesel engines that power the emergency fire water pumps, but these sources would only operate during an emergency, and would fall within acceptable cancer risk and ORCAA thresholds.") Permit Application, Appendix A at PDF 30. (*emphasis added*). The permit applicant's apparent assertion that this emitting units and air pollution would be excused from permitting requirements is wrong. The emissions from all emitting units must be considered in the facility-wide emission inventory prepared to determine applicable requirements under the Act.

⁷² See e.g. SWCAA Letter at PDF 17.

⁷³ Preliminary Determination at 11.

⁷⁴ Preliminary Determination at 11 ("PNWRE will also have the ability to deliver pellets via a truck unloading system; however, this system would be used only in special circumstances. PNWRE proposes no more than 10 loaded trucks per day and 32,000 tons per year of truck loadout utilization.")

⁷⁵ Permit Application, Appendix A at PDF 25 ("The processing of wood chips at the proposed facility includes ... a ship loadout area.")

⁷⁶ EPA Draft NSR Workshop Manual at A-18 (Oct. 1990), *available at* <https://www.epa.gov/nsr/nsr-workshop-manual-draft-october-1990> ("Secondary emissions do not include any emissions which come directly from a mobile source, such as emissions from the tailpipe of a motor vehicle or from the propulsion unit of a train or a vessel. This exclusion is limited, however, to only those mobile sources that are regulated under Title II of the Act (see 43 FR 26403 - note #9). Most off-road vehicles are not regulated under Title II and are usually treated as area sources. [As a result of a court decision in *NRDC v. EPA*, 725 F.2d 761 (D.C. Circuit 1984), emissions from vessels at berth ("dockside") not to be included in the determination of secondary emissions but are considered primary emissions for applicability purposes.] ("NSR Workshop Manual.") That the vessel emissions generated in loading the pellets at the port should be included in the applicability determination comes from definitions in the Act. The Act's definition of "stationary source" requires the permitting agency authority to consider emissions from external combustion engine vessels in preconstruction and operating permits. 42 U.S.C. § 7602(z). That definition means "generally any source of an air pollutant except those emissions resulting directly from an internal combustion

area.” The permit applicant must estimate air pollutant emissions from the vessel traffic and supplement the permit application.⁷⁷ Because emissions from the vessels will impact air quality at considerable distances from the proposed pellet mill and these impacts are not limited to just the area near the loading dock. The air quality modeling must consider maritime emissions associated with the project beyond those that occur close to the loading dock because they will have an impact on air quality concentrations.

D. Permit Application Fails to Include Emissions from the Transport of Finished Product from the Five Wood Pellet Silos to the Ship Loadout Area.

The permit application fails to disclose and quantify emission estimates from the transport of the finished product from the five wood pellet silos to the ship loadout area. This information must be quantified and included in a revised application. The preliminary determination explains that the adjacent property owner holds an existing air permit for its operations and that the permit applicant proposes to use the existing equipment at the adjacent property to transport the finished product to the ship loadout area. However, what is not disclosed is how the increase in operational capacity on the adjacent property impacts emissions. The proposed action does not quantify and disclose new emissions from operations at the adjacent property including emissions from moving the finished product to the ship loadout area and emissions from transferring the finished product to the marine vessels, notably other state permits for similar operations include a baghouse to control emissions are a ship loadout area. There is nothing in the proposed action to cover permit modifications for the existing source’s operations. The permitting authority must clearly identify what owner/operator is responsible for emission from use of the equipment on the adjacent property that is proposed to be used by two separate legal entities, and how that information will be monitored, what records will be keep and how that information is reported to the permitting agency.

E. The Permit Application Fails to Include Any Emissions for Construction Activities.

The permit application explains that this is a new source and that substantial earth moving will be involved.⁷⁸ Emissions of air pollutants from construction differs from

engine for transportation purposes or from a nonroad engine or nonroad vehicle as defined in section 216.” CAA Section 216 definitions of “nonroad engine” and “nonroad vehicle” are limited to internal combustion engines. 42 U.S.C. §§ 7550(10), (11). Thus, the vessels powered by external combustion engines that arrive at the port and load the wood pellets would be a “stationary source” for permitting purposes. The air pollutant emissions from activities in support of the proposed pellet plant, including those for transporting the pellets from the proposed pellet mill for sale at other locations, including those from marine vessels propelled by external combustion engines, are considered stationary emissions of the proposed pellet mill for CAA Title I and Title V purposes.]

⁷⁷ In estimating criteria, HAP and TAP air emissions, the permit applicant must estimate the maximum number of marine vessels per year, including any operations for support (e.g., tugs), including the total number of hours per call and hours spent beyond the loadout area. Air pollutants emitted from marine vessels are anticipated to include the following: NO_x, CO, SO₂, PM₁₀, PM_{2.5}, VOC, HAPs, TAP, and CO₂e.

⁷⁸ For example, particulate emissions from the following activity must be included, “Grading will be needed to prepare the building site, and other site components. Approximately 110,279 cubic yards of material will be excavated at the Project Site, from within an area approximately 46.5 acres in size, associated with construction of

operation, and the permit application fails to disclose and quantify those emissions. The application must be revised to include these activities, the associated emission estimates. The approval order must include methods for control, as well as the associated monitoring, recording and reporting requirements.

III. The Permit Application Fails to Address the Act's Regional Haze Four-Factor Analysis Requirements.

Under 40 C.F.R. § 51.307(c), permitting agencies must ensure that new major sources or major modifications will be consistent with the Act's Regional Haze Program requirement to make reasonable progress toward the national visibility goal. As a result, permitting agencies must conduct Four-Factor Analyses for new major sources or major modifications to satisfy the Act's requirements. The Four-factor Analysis includes consideration of the following:

- Consider the costs of compliance,
- The time necessary for compliance,
- The energy and non-air quality environmental impacts of compliance, and
- The remaining useful life of any potentially affected sources.⁷⁹

Washington's Department of Ecology, as the State's permitting agency approved by EPA to implement the permit program for new major sources, must ensure that for pollutants for which the proposed pellet mill is major, the 40 C.F.R. § 51.307(c) requirements are met. As the ORCAA is aware, EPA's program approval does not give it the authority to conduct these activities and make these determinations.

IV. The Proposed State-BACT Determinations are Flawed and Incomplete, and the Proposed Emission Limitations Fail to Reflect State-BACT.

A. The Permit Applicant Must Look Beyond a Search of EPA's RACT/BACT/LAER Clearinghouse Database to Identify State-BACT Control Technologies.

For two emitting units, the permit applicant explains that it only searched the EPA's RACT/BACT/LAER Clearinghouse ("RBLC") to identify emission control technologies for certain emitting units. These emitting units include the following:

- **NO_x BACT for Drying Line** (potential NO_x emissions of 227.76 TPY)

An RBLC search to identify NO_x control technologies for hog fuel-fired or wet barkfired dryers at wood pellet facilities did not yield any results. Therefore, good

the facilities. A total of approximately 41.2 acres of the site will be graded to prepare the site." Permit Application, Appendix A at PDF 28.

⁷⁹ 42 U.S.C. § 7491(g)(1); 40 C.F.R. 51.308(f)(2)(i).

combustion practices, which is always available, is the only available control technology.⁸⁰

- **SO₂ BACT for Drying Line** (potential SO₂ emissions of 18.5 TPY)

An RBLC search to identify SO₂ controls applied to hog fuel or wet bark combustion did not yield any results. Accordingly, good combustion practices, which are always available, are proposed to satisfy BACT for SO₂.⁸¹

The permit applicant only considered and proposed controls if they were found in the RBLC database. While EPA created the RBLC to be used as a database of air pollution technology information, it is not a comprehensive compilation. For example, there are numerous emission control projects in the U.S. that are not subject to the Act's major source permitting programs and therefore are not documented in the RBLC. Furthermore, not all permitting agencies routinely upload determinations. The RBLC is not a comprehensive and inclusive collection of permit applications and determinations. Permit applicants must look elsewhere. Indeed, ORCAA's fact sheet on BACT determinations recognizes the need for permit applicants to look beyond the RBLC. Though ORCAA cites the Clearinghouse as "one very good resource,"⁸² it does not suggest it is the only resource. When conducting a federal BACT analysis for the major source permitting requirements – which are the same as the State-BACT elements – EPA explains that:

Applicants are expected to identify all demonstrated and potentially applicable control technology alternatives. Information sources to consider include: EPA's BACT/LAER Clearinghouse and Control Technology Center; Best Available Control Technology Guideline – South Coast Air Quality Management District; control technology vendors; Federal/State/Local new source review permits and associated inspection/performance test reports; environmental consultants; technical journals, reports and newsletters (e.g., JAPCA and the McIvaine reports), air pollution control seminars; and EPA's New Source Review (NSR) bulletin board. The applicant should make a good faith effort to compile appropriate information from available information sources, including any sources specified as necessary by the permit agency.⁸³

⁸⁰ Permit Application at 19.

⁸¹ Permit Application at 20.

⁸² ORCAA, Instructions for Form 6, Best Available Control Technology (BACT) at 1, *available at* <https://www.orcaa.org/wp-content/uploads/Form-6-BACT-Analysis-2018.pdf> ("STEP 1: IDENTIFY AVAILABLE CONTROL TECHNOLOGIES: For the source, emissions unit, activity, or process requiring BACT, identify and list all "available" emissions control options for the pollutant in question. Available control options are those air pollution control technologies and techniques with a practical potential for application to the source, emissions unit, activity, or process. In general, any control option in commercial use in the U.S. at the time the analysis is performed should be included on the list of available control options. One very good resource for obtaining listings of control options in use for a particular source type is the U.S. EPA BACT/LAER Clearinghouse (RBLC) which can be viewed at <http://cfpub.epa.gov/RBLC/>.") (emphasis added) (Attachment DD).

⁸³ NSR Workshop Manual at B.11.

The permit applicant's search of just one location failed to identify all demonstrated and potentially applicable control technology alternatives. ORCAA's responsibility is to "review the background search and resulting list of control alternatives presented by the applicant to check that it is complete and comprehensive."⁸⁴ As discussed below, because there are control alternatives available, the permit applicant failed to perform its due diligence in searching. ORCAA must require the complete search.

B. The Proposed NOx Emission Limitations for the Drying Line Do Not Reflect State-BACT Requirements.

For NOx emissions from the drying line, the permit applicant merely proposes good combustion practices—which it asserts is the only available control technology—with NOx emissions not to exceed 52 lb/hr as BACT for the drying line. The permit applicant suggests that NOx emissions from the drying line would result in 227.76 TPY. The permit applicant failed to evaluate low NOx burner controls, which are used at other existing pellet mills to control NOx. For example, based on source test results at the Enviva Pellets Greenwood Facility and the emission factor developed for its use of low NOx burners, the permit applicant did not propose an emission limitation based on the maximum degree of reduction, as required by State-BACT.⁸⁵ A second example of the availability of low NOx burner technology for the wood pellet industry is the proposed Longview Pellet Mill, which proposes to install low NOx burners because it is a demonstrated control technology in pellet manufacturing facilities.⁸⁶

C. It is Unclear Whether the Proposed PM Emission Limitations for Dry Hammer Mills and Pellet Line Meet the State-BACT Requirements.

The vendor information for the "Pelleting Line" indicates that there was a design change from cyclones to baghouses,⁸⁷ while the permit application indicates both control devices are planned, proposing "the combined use of cyclofilters and baghouses for controlling PM from the dry hammer mills and pellet line."⁸⁸ As this could impact the stringency of the emission limitations, this discrepancy must be clarified and corrected. Furthermore, the proposed determination must be supported by determinations and source tests conducted at other pellet mills.⁸⁹

⁸⁴ NSR Workshop Manual at B.11.

⁸⁵ For example, in terms of the Enviva Greenwood testing, the furnace there operated at an average heat input of 135 MMBtu/hr during the testing, and emitted NOx at a rate of 18.5 lb/hr. *See* Enviva Greenwood Test Report, at 20; *see also id.* at Appendix IG: Process Data, Table 4 at 212. The proper emission factor therefore is 0.137 lb/MMBtu, not the 52 lb/hr suggested by Port of Grays Harbor Wood Pellet Plan. $(0.137 \text{ lb/MMBtu} * 1,648,100) / 2000 \text{ lbs/ton} = 129 \text{ tpy NOx.}$

⁸⁶ *See* SWCAA Letter, at PDF 4.

⁸⁷ Permit Application, Appendix D at PDF 19.

⁸⁸ Permit Application at 22.

⁸⁹ *See e.g.* SWCAA Letter at PDF 6; *see also id.* at PDF 7.

D. The Proposed Emission Limitations for the Emergency Generator and Fire Pump Engines Do Not Reflect State-BACT Requirements.

The permit applicant explains that a 300-kilowatt backup emergency generator would be installed at the proposed pellet mill. The diesel-fired engine for this generator would be certified to meet the emissions standards of 40 CFR 60, Subpart IIII and would be fired with ultra-low-sulfur diesel only. Other than emergency use, backup emergency engines are limited by 40 C.F.R. 60, Subpart IIII to no more than 100 hours per year of operation for maintenance checks and readiness testing.⁹⁰ The permit applicant further proposes that BACT/tBACT⁹¹ for all pollutants emitted from the generator would be good combustion practices, following manufacturer's instructions for maintenance, and compliance with the applicable conditions for emergency engines from 40 CFR 60, Subpart IIII.⁹² As discussed above, the permit applicant indicates there will be diesel engine(s) to run the emergency fire pumps.

Given that State-BACT is supposed to be based on the maximum degree of emission reduction achievable and the fact that this would be a new pellet mill, all diesel engines must meet Tier 4 emission standards as State-BACT limits. Tier 4 engines are readily available and, given that Tier 4 engines achieve the lowest emission rates of NO_x, PM, and CO, such engines must be considered State-BACT for the firewater pump, emergency generator, and any other diesel engines at the proposed pellet mill.

E. The Proposed SO₂ Requirements for the Drying Line Do Not Reflect State-BACT Requirements.

As discussed above, the permit applicant's RBLC search did not yield any results to identify SO₂ controls applied to hog fuel or wet bark combustion. The permit applicant must search for additional controls beyond "good combustion practices" and supplement the permit application with the results of those efforts, proposing source-specific BACT requirements for the SO₂ emissions.

F. State-BACT Determinations Must be Included for the Missing Emitting Units and Emission Sources.

As discussed above, there are emissions and emission units that are not in the permit application. State-BACT analyses must be prepared for all of these and included in a supplemental permit application.

⁹⁰ Permit Application at 24.

⁹¹ *Id.*

⁹² *Id.* at 24.

G. State-BACT Emission Limitations are Continuous Requirements and All Operating Scenarios Must Have State-BACT Determinations.

The emission limitations established through the State-BACT analysis must be met continuously.⁹³ Despite these requirements, as discussed below, the permit application includes numerous alternative operating scenarios and the applicant fails to include proposed State-BACT emission limitations or work practices for these various scenarios. Thus, the permit application is incomplete.

First, the permit application does not include a proposed State-BACT analysis for the planned startups. It appears there was email correspondence from the permit applicant to ORCAA on these emissions, but that information is not available to the public. While ORCAA staff evaluated the permit applicant's emissions calculations and concurs with its assessment, the public cannot independently review that information. Though ORCAA explains it proposes startup constraints consistent with the cold startup descriptions provided by permit applicant, the public cannot access the adequacy of what ORCAA proposed without access to the underlying analysis.⁹⁴ Moreover, because the State-BACT emission limitations must be met continuously, the proposed pellet mill cannot be exempted from the State-BACT opacity limits, as is proposed.⁹⁵

Second, during planned shutdowns, hot gases from both the furnace and dryer will be emitted through the emergency bypass stacks for these units until they are sufficiently cooled.⁹⁶ Alternative State-BACT emission limitations are not proposed during these events. The Preliminary Determination notes that it is "ORCAA's understanding" that the permit applicant "anticipates only two shutdowns of the furnace each year but assumed 10 for the air impacts analysis."⁹⁷ It is unclear what was assumed as inputs for the modeling for these events, as the modeling protocol was not disclosed as part of the public comment materials.

Third, during malfunctions and emergencies, the furnace automatically aborts to the furnace bypass stack in the event of a malfunction or emergency situation, like loss of power or failure of a critical piece of equipment.⁹⁸ Likewise, the dryer system automatically aborts to the dryer bypass stack due to similar events.⁹⁹ Whenever there is an abort, the furnace automatically switches to idle mode and emissions are exhausted through the bypass stack.¹⁰⁰ During malfunctions and emergencies, air emissions from the drying system may emit uncontrolled from the bypass stacks and exhaust through either of the bypass stacks is presumed to be in excess of

⁹³ See ORCAA Rule 1.4 Definitions "'Emission standard' and 'emission limitation' means a requirement established under the FCAA or chapter 70.94 RCW [this chapter of Washington State law was recodified to 70A.15 RCW⁹³] which limits the quantity, rate, or concentration of emissions of air contaminants on a continuous basis, including any requirement relating to the operation or maintenance of a source to assure *continuous emission reduction* and any design, equipment work practice, or operational standard promulgated under the FCAA or chapter 70.94 RCW."

⁹⁴ Preliminary Determination at 8.

⁹⁵ Preliminary Determination at 9.

⁹⁶ Preliminary Determination at 9.

⁹⁷ Preliminary Determination at 10.

⁹⁸ Preliminary Determination at 10.

⁹⁹ Preliminary Determination at 10.

¹⁰⁰ Preliminary Determination at 10.

the pollutant mass rate limits established in the approval order.¹⁰¹ The permit applicant must not be excused from State-BACT requirements during these operations.

Fourth, the proposed pellet mill will also operate in a feedstock interruption mode, which is described as an idle-mode that may be triggered by a reduction or interruption of feedstock material to the dryer. Apparently, the permit applicant asserted in a communication with ORCAA that the furnace, dryer, dry hammer mills, and pellet coolers will all be exhausted through their respective air pollution control systems when there are feedstock interruptions,¹⁰² but those communications were not made available as part of this public comment opportunity.

V. The Proposed Conditions of Approval Authorize Bypass of the Air Pollution Controls, Unlawfully Excusing the Proposed Pellet Mill from Continuous Compliance with Case-by-Case Maximum Achievable Control Technology (MACT).

Because the permit applicant intends to construct a major source of HAPS, a case-by-case MACT determination is necessary. The permit applicant has thus far proposed RTOs and RCOs to destruct the HAPs and achieve at least 95% and 96.3% destruction of VOCs. Unfortunately, the draft permit improperly allows the permit applicant to bypass air pollution controls that are required as MACT during periods of startup, shutdown and otherwise “as necessary,” apparently referring to malfunctions (“SSM exemptions”).¹⁰³

These SSM exemptions are unlawful because they excuse the plant from continuous compliance with otherwise applicable emission limitations under Clean Air Act section 112. As explained by the D.C. Circuit in *Sierra Club v. EPA*, 551 F.3d 1019, 1027 (D.C. Cir. 2008), an emission limitation established under section 112 must be “continuous,” and therefore, a source cannot be exempted from compliance at any point. Specifically, the court found that a MACT standard under section 112 is an “emission standard,” and Clean Air Act section 302(k) defines “emission limitation” and “emission standard” as “a requirement established by the State or the Administrator which limits the quantity, rate, or concentration of emissions of air pollutants on a continuous basis.” *Id.* at 1021 (quoting 42 U.S.C. § 7602(k)); *see also* Clean Air Act § 112(g)(2)(B), 42 U.S.C. § 7412(g)(2) (providing that no new source may be constructed “unless the Administrator (or the State) determines that the maximum achievable control technology emission limitation under this section for new sources will be met,” and instructing that if the Administrator has not established such emission limitation, it shall be established on a case-by-case basis). ORCAA’s proposal to allow for bypass of the RTOs during periods of SSM is exactly the type of exemption from section 112 standards that the D.C. Circuit found to be unlawful. ORCAA must eliminate this unlawful exemption and ensure that the permit applicant is required to comply with section-112 standards at all times.

Additionally, ORCAA cannot excuse compliance with the numerical MACT limits by implementing a work practice standard. Under the plain language of the Act, work practice standards may only be implemented in two instances:

¹⁰¹ Preliminary Determination at 10.

¹⁰² Preliminary Determination at 10.

¹⁰³ Recommended Conditions of Approval, ¶¶ 9, 10 at 37-38.

- A) When pollutants “cannot be emitted through a conveyance designed and constructed to emit or capture such pollutant;” or
- B) When “the application of measurement methodology to a particular class of sources is not practicable due to technological and economic limitations.”

42 U.S.C. § 7412(h)(1) and (2). The permit applicant has not demonstrated that it cannot route its emissions through a stack or measure those emissions during SSM events. Nor is it likely the permit applicant could do so. By the permit applicant’s own admission, during startup and shutdown it will continue to vent emissions through a stack. Additionally, the permit applicant has not claimed that it would be infeasible to measure emissions while operating the bypass stacks. In fact, in a permit application for another pellet mill, that company states explicitly that emissions associated with bypass events “were calculated based on stack testing data from comparable Enviva facilities.”¹⁰⁴

VI. The Permit Applicant Must Prepare and Submit a Permit Application to the Department of Ecology for PSD BACT for CO and CO_{2e} Emissions.

Once all stack and fugitive emissions estimates have been obtained through detailed engineering analysis of each emissions unit using the best available data or estimating technique, which as discussed above has not been done, the next step is to compare the potential emissions of each of the pollutants from the proposed pellet mill to the 100 TPY PSD major source threshold. Moreover, the potential to emit of CO is greater than 250 TPY. Because the Proposed Pellet Plant is classified as a major source because of the estimated CO emissions, the entire source is classified as a major source.

Furthermore, because the CO emissions (and any other pollutants) trigger the PSD major source permitting requirements, the proposed pellet mill must also evaluate whether the proposed CO_{2e} emissions trigger the major source PSD requirements. CO_{2e} emissions from the proposed pellet mill are estimated at 163,592, which exceeds the PSD major source threshold of 100,000.¹⁰⁵ Therefore, the proposed pellet mill is subject to CO_{2e} BACT for the units with CO_{2e} emissions (*i.e.*, the Dry Hammer Mill and Pellet Cooler, and the Drying Line). The permit applicant must prepare and submit PSD BACT determinations to the Washington State Department of Ecology.

VII. The Permit Application Contains Deficient and Inaccurate Ambient Air Modeling.

A. The Permit Applicant Must Correct the Missing and Inaccurate Information and Rerun the AERMOD Model Using the Current Model Version.

Once the corrections to the inaccurate and missing emission estimates are made, the air dispersion model inputs must incorporate the changes to the criteria pollutants and the model

¹⁰⁴ Enviva Pellets Lucedale, Application for Initial State Permit to Construct, at 3.7.2 and 3.7.3. at 9 (Sept. 2018) (Attachment EE).

¹⁰⁵ Permit Application, Appendix C, Table C-1 at PDF 3.

must be rerun. Additionally, the permit applicant used version v22112 of AERMOD.¹⁰⁶ That version is outdated—the current EPA-approved version of AERMOD is v23132,¹⁰⁷ which must be used when the model is rerun for the proposed pellet mill. Notably, the current regulatory version of AERMOD will assist with evaluation of emissions from the marine vessels.¹⁰⁸

Furthermore, the modeling protocol documents must be made available to the public. Much of the detailed information about the modeling analysis is not available to the public. For example, the Preliminary Determination notes that it is “ORCAA’s understanding” that the permit applicant “anticipates only two shutdowns of the furnace each year but assumed 10 for the air impacts analysis.”¹⁰⁹ It is unclear what was assumed as emission inputs in the modeling for these events, as the modeling protocol was not disclosed as part of the public comment materials.

B. Ambient Air Background Concentration Data Used Does Not Represent Current Conditions.

The Clean Air Act and implementing regulations establish a program for PSD permit applicant collection and submission of twelve months of ambient air quality monitoring data, for the year preceding the date of permit application, showing pollutant concentrations at the site of the proposed facility and in areas that may be affected by emissions from that facility.¹¹⁰ These data may then be used, in conjunction with other information, to demonstrate the proposed facility’s compliance with the NAAQS and PSD increments.¹¹¹ The permit applicant needs to collect ambient air quality measurements documenting baseline conditions representative of the current air quality at the project site, or otherwise demonstrate that it meets the applicable monitoring exemptions under the applicable regulations.¹¹² The permit applicant used ambient air quality estimations that fail to document current conditions.¹¹³ The background concentration information was obtained from Idaho, which is described as “modeled and monitoring data from July 2014 through June 2017.”¹¹⁴ That data contains estimated values, is between six and nine

¹⁰⁶ Permit Application, Appendix F, Model Inputs and Outputs, at PDF 3. (Attachment FF). (“Permit Application, Appendix F”).

¹⁰⁷ EPA, Air Quality Dispersion Modeling - Preferred and Recommended Models, Memo on release of this version (Oct. 12, 2023), available at <https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models>. (Attachment GG).

¹⁰⁸ *Id.* at 4. (“Perhaps the most substantial update to AERMET is the addition of the Coupled Ocean Atmosphere Response Experiment (COARE) air-sea flux procedure for processing meteorological data representative of a marine boundary layer needed for modeling offshore sources.”)

¹⁰⁹ Preliminary Determination at 10.

¹¹⁰ 42 U.S.C. § 7475(a)(7), (e); 40 C.F.R. § 52.21(m).

¹¹¹ See NSR Workshop Manual at C.16-21.

¹¹² 40 C.F.R. § 52.21(m)(1)(iv) (“In general, the continuous air quality monitoring data that is required shall have been gathered over a period of at least one year and shall represent at least the year preceding receipt of the application, except that, if the Administrator determines that a complete and adequate analysis can be accomplished with monitoring data gathered over a period shorter than one year (but not to be less than four months), the data that is required shall have been gathered over at least that shorter period.”)

¹¹³ Permit Application at PDF 41.

¹¹⁴ Permit Application at PDF 41 (“Background concentrations in Table 8 were obtained from NW-AIRQUEST. For each pollutant and averaging period, the concentration of the closest grid point to the proposed facility (coordinates 46.99, -123.89) was used.”), citing Idaho DEQ, Background Concentrations 2014-2017, available at <https://idahodeq.maps.arcgis.com/apps/MapSeries/index.html?appid=0c8a006e11fe4ec5939804b873098dfe>.

years old, and does not represent current background ambient monitoring conditions. A permit applicant cannot substitute ambient data unless it is deemed “sufficiently representative of air quality in the targeted area — in terms of the sufficiency of the monitoring locales selected and the quality and currentness of the monitoring data — to legitimately be substituted for site-specific data.”¹¹⁵ The permit applicant has not complied with the baseline monitoring requirements because it has relied upon data which is out of date and no longer representative of baseline air quality conditions.

C. The Permit Application Fails to Include Modeling Runs for the Range of Operating Conditions.

Ambient impacts were estimated based on continuous operation and maximum PTE for all pollutants evaluated,¹¹⁶ but the proposed pellet mill does not plan to operate in that manner. Other foreseeable operating scenarios include “cold” startup,¹¹⁷ planned shutdowns,¹¹⁸ and idle mode.¹¹⁹ Additionally, based on email correspondence – which were not included in the materials available for public review – the permit applicant also plans bypass events where emission control technology is not in use.¹²⁰ For example, for the drying line, the vendor information includes a heat energy system with an emergency exhaust stack for bypass events.¹²¹ Documentation provided by the permit applicant via email of emission estimates during the range of foreseeable operating scenarios (including the bypass events) was not included in the materials made available during this public comment period.¹²² Thus, there is no way for the public to assess assertions that maximum PTE for all pollutants were evaluated and modeled.

¹¹⁵ *In re Vulcan Materials, LP*, 15 E.A.D. 163, 176 (EAB 2011); *see also In re Northern Michigan University*, 14 E.A.D. 283, 325 (EAB 2009), *citing* NSR Workshop Manual at C.18-19; *see also, e.g., In re Knauf Fiber Glass, GMBH*, 8 E.A.D. 121, 145-48 (EAB 1999); *see also In re Haw. Elec. Light Co.*, 8 E.A.D. 66, 97-105 (EAB 1998); *see also In re Hibbing Taconite Co.*, 2 E.A.D. 838, 850-51 (EAB 1989).

¹¹⁶ Preliminary Determination at 27, 29.

¹¹⁷ Preliminary Determination at 14.

¹¹⁸ Preliminary Determination at 9-10.

¹¹⁹ Preliminary Determination at 10.

¹²⁰ Preliminary Determination at 8.

¹²¹ Permit Application, Appendix D at PDF 36 (“**Emergency Abort Stack** To vent Dryer System gasses to atmosphere during upset operating conditions At times the Dryer System flue gas will need to be aborted to atmosphere during upset operating conditions; rather than sending these flue gasses to the Pollution Control Equipment or to the Heat Energy System. The Emergency Abort Stack provides the ability to vent gases to atmosphere during upset operating conditions. The control damper is air actuated and is fail safe; if there is a power outage or air failure the Emergency Abort Stack will automatically open.”); *see also id.* at PDF 39. (“Mounted on top of the Furnace and includes automatic hydraulic damper. The purpose of the Emergency Stack is to open at high temperature and/or high pressure in the system and at power failures. It is fabricated from mild steel and refractory-lined for the first 5 feet above the furnace roof. The remainder of the stack is made of stainless steel and includes one pneumatically operated damper on top as a stack cap. Stack cap is made of stainless steel and also has refractory lining.”); *see also id.* at PDF 27 (“Wet hammer mills feeding chain conveyor It receives the chips from the previous chain conveyor (pos 5.2.4). It includes two intermediate outlets to feed each of the wet hammer mills and a final outlet as emergency exit.”)

¹²² *See e.g.* Preliminary Determination at 8-9.

VIII. The Draft Approval Order's Terms and Conditions are Insufficient to Ensure Compliance with the Clean Air Act.

A. The Final Approval Order Must Contain When and How Often Stack Testing is Required.

The recommended conditions of approval fail to specify when and how often the permit applicant must conduct the initial and periodic stack tests in order to demonstrate compliance with the emission limits for PM₁₀ (filterable and condensable), VOCs, CO, NO_x, and HCl.¹²³ The recommended conditions fail to include testing for PM and PM_{2.5}, which must also be added. The approval order must require simultaneous NO_x and CO stack testing, otherwise the owner/operator can tune to reduce one and then the other.

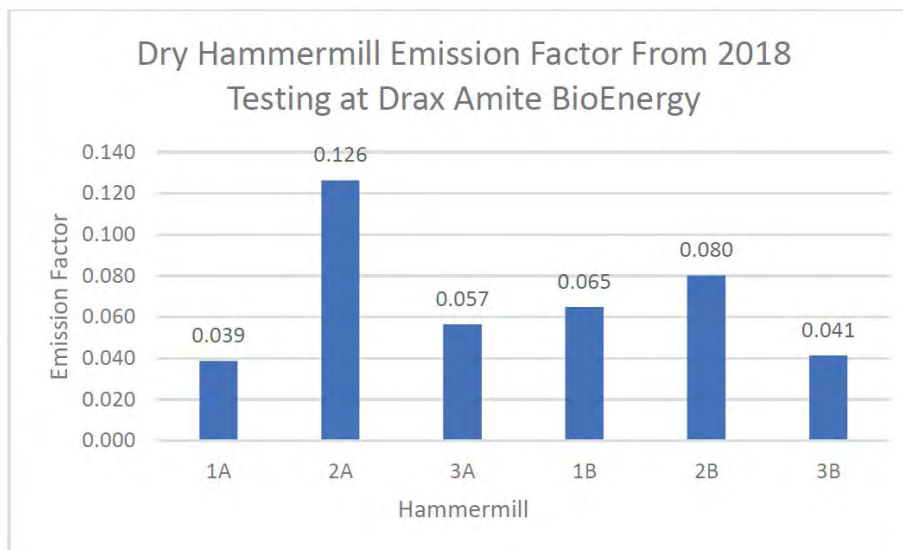
Although we appreciate that ORCAA has specific test methods, the current compliance testing requirements are insufficient to ensure that the proposed pellet mill is in continuing compliance with its emission limits. In order to demonstrate continuous compliance, the conditions of approval must require both initial and periodic stack testing.¹²⁴ Emissions at wood pellet plants are highly variable, meaning that stack testing at a facility may indicate compliance one year and non-compliance the next. In fact, emissions from wood pellet plants have been shown to vary by more than 100% from one year to the next. For example, testing just a year apart on pellet coolers at a Georgia pellet plant produced an emission factor that was twice as high as the initial compliance testing, with no modification or other operating changes apparently responsible.¹²⁵ Additionally, where pellet plants have tested multiple identical units at the same time, those tests have shown a large variability in emissions. The Drax Amite wood pellet plant in Gloster, Mississippi, tested all six of its hammermills for VOC emissions,¹²⁶ and the results are below:

¹²³ Preliminary Determination, at 35, (Recommended Conditions of Approval ¶ 5).

¹²⁴ See e.g., *supra* n.14 (State-BACT continuous requirement); see also *supra* n.15.

¹²⁵ Compare August 28, 2014, stack tests on the pellet coolers at Hazlehurst Wood Pellets in Georgia (producing an emission factor of 0.30 lb/ODT), with testing at the same plant conducted on December 16, 2015 (producing an emission factor of 0.62 lb/ODT) (test excerpts at Attachment HH).

¹²⁶ Letter from Keith W. Turner, legal counsel for Amite Bioenergy, to Tim Aultman, Environmental Compliance & Enforcement Division, MDEQ (Nov. 5, 2018) (Attachment II).



These results highlight the variability even between identical units tested simultaneously. For example, the test for hammermill 2A demonstrated VOC emissions that were vastly higher than emissions from hammermill 1A, with no design or operational distinction responsible. In the present context, this graph shows how two consecutive tests could readily show emissions that are significantly lower than worst case emissions when the reality is that outside of those two tests emissions are much higher on average.

In order to demonstrate continuing compliance with its emission limits, the conditions of approval must subject the proposed pellet mill to annual compliance testing, with the initial compliance test occurring no later than 180 days after the initial start-up after the facility's construction and without the possibility of less frequent testing.¹²⁷ As a preliminary matter, ORCAA should incorporate a firm deadline for initial compliance testing into the conditions of approval as an enforceable condition, rather than setting such deadline at a later time, which would not be subject to public review and enforcement. ORCAA must also, at a minimum, amend the proposed conditions of approval to require annual source testing. North Carolina's Department of Environmental Quality decided to require annual stack testing—without the possibility of less frequent testing—at three Enviva plants undergoing modifications.¹²⁸ There is no reason why ORCAA should not require the same from the permit applicant for the proposed pellet mill.

¹²⁷ See *supra* n.14; see also *supra* n.15.

¹²⁸ See North Carolina DEQ, Air Quality Permit No. 10365R03 for Enviva Pellets Hamlet, LLC, at Condition 2.2.A.2.d. at 12 (Jan. 14, 2019), *available at* <https://deq.nc.gov/about/divisions/air-quality/air-quality-permitting/wood-pellet-industry-permitting-actions-and#enviva-pellets-hamlet> (Attachment JJ); North Carolina DEQ, Air Quality Permit No. 10386R04 for Enviva Pellets Sampson, LLC, at Condition 2.2.A.1.e. at 14-15 (Oct. 2, 2019), *available at* <https://deq.nc.gov/about/divisions/air-quality/air-quality-permitting/wood-pellet-industry-permitting-actions-and#enviva-pellets-sampson> (Attachment KK); North Carolina DEQ, Air Quality Permit No. 10203R06 for Enviva Pellets Northampton, LLC, at Condition 2.2.A.3.f. at 15-16 (Oct. 30, 2019), *available at* https://files.nc.gov/ncdeq/Air%20Quality/permits/2019_public_notice_documents/Enviva-Northampton---Final-Permit-Signed.pdf (Attachment LL).

Finally, ORCAA must include requirements to test not only the emission rate but the destruction efficiencies of the RTOs and RCOs. As discussed above, ORCAA must establish case-by-case MACT limits that are expressed as 95% VOC destruction for the dryer RTO, as well as 96% VOC destruction for the RCO. Merely testing the outlet of the RTO/RCO will not demonstrate whether the units are meeting the MACT limits. Instead, ORCAA must require the permit applicant to test both the inlets and outlets of these units in order to ensure compliance with the MACT limits.

B. The Approval Conditions Must Include Detailed Reporting Requirements.

The proposed approval conditions require recording many data points directly related to emissions, such as pellet production, dryer and green hammermill throughputs, start-up, shut-down, and malfunction occurrences, and control device parameters. However, they only require the permit applicant to report a selective minimum of this data to ORCAA.¹²⁹ Complete reporting is crucial to effective public oversight. It is difficult or downright impossible for members of the public to access this information without a reporting requirement, and the lack of access to these records seriously hinders citizen enforcement, which is a key component of the Clean Air Act. Given the documented history in this industry of numerous, serious exceedances in recent years, public oversight is especially important.¹³⁰ Accordingly, ORCAA must amend the conditional approval conditions to require the permit applicant to report the data points in its semi-annual reports.

Moreover, there are several important data points, including the emissions calculations and the facility's actual emissions of relevant criteria pollutants and hazardous air pollutants, as well as the facility's wood feedstock mix, which are completely excluded from both the recordkeeping and reporting requirements. In order for the emission limits to be considered enforceable, they must be accompanied by monitoring, recordkeeping, and reporting sufficient to ensure and verify compliance at all times.¹³¹

Finally, ORCAA must specifically include a requirement to monitor and report the heat input of the facility's furnaces in order to ensure compliance with the facility's NO_x emission limits. As discussed above, complying with the wood pellet production limit and related monitoring is insufficient to ensure NO_x emissions are met. ORCAA must remedy this by requiring monitoring, recordkeeping, and reporting of the heat input values and correlated NO_x emissions.

¹²⁹ Preliminary Determination, at 40, (Recommended Conditions of Approval ¶ 16).

¹³⁰ Environmental Integrity Project, *Dirty Deception: How the Wood Biomass Industry Skirts the Clean Air Act* (April 26, 2018), <https://www.environmentalintegrity.org/wp-content/uploads/2017/02/Biomass-Report.pdf>. (Attachment MM).

¹³¹ U.S. EPA, *Guidance Limiting Potential to Emit in New Source Permitting*, at 17 (June 13, 1989), *available at* https://www3.epa.gov/airtoxics/pte/june13_89.pdf ("Specific test methods, compliance monitoring and recordkeeping and reporting requirements are necessary to make permit limitations enforceable as a practical matter."). (Attachment NN).

C. ORCAA Must Remove the Provisions that Provide for Director’s Discretion.

Several provisions in the Recommended Conditions of Approval give ORCAA the authority to approve alternate or equivalent test methods that are not EPA-approved test methods.¹³² ORCAA’s proposal does not explain what criteria and process it would use to approve all the alternative methods allowed under the proposed conditions. ORCAA’s alteration or elimination of EPA-required test methods can have no effect for purposes of federal law unless and until EPA ratifies those alternatives, including provisions for public notice and comment. Moreover, Section 113 of the Act allows EPA to enforce against “any requirement or prohibition of an applicable implementation plan or permit” and any “requirement or prohibition of any rule, order, waiver or permit promulgated, issued, or approved under [the Act].”¹³³ It is unclear whether an ORCAA approved alternative method using the proposed provisions would allow for EPA enforcement. Similar concerns are present for citizen suits under section 304.¹³⁴ ORCAA must remove these provisions.

D. ORCAA Must Require Implementation of Source-Specific Fugitive Dust Requirements.

Wood pellet plants generate a lot of fugitive dust, *i.e.*, airborne particulate matter. In fact, one of the most common air pollution complaints raised by residents of communities where wood pellet plants are located is the large amount of fugitive dust that escapes into surrounding neighborhoods.¹³⁵ For example, in 2017 Mississippi’s Department of Environmental Quality issued a Notice of Violation to the Enviva plant in Amory, describing “multiple complaints over the past year pertaining to sawdust and smoke leaving the [Enviva Amory] facility impacting neighboring properties and vehicles.”¹³⁶ A local alderman described the impacts on residents of his ward, who said “are wheezing, coughing and constantly washing dust of their vehicles generated by the Enviva pellet plant.”¹³⁷ Additionally, residents living near Enviva’s Northampton, North Carolina plant expressed frustration over dust, with one resident who lives across the street from the plant complaining about dust coating his car and house: “I have to wash [my house] every two to three months, my vehicle every two to three days.”¹³⁸ Considering

¹³² See *e.g.* Preliminary Determination, at 36, (Recommended Conditions of Approval ¶ 6(e), which would allow for equivalent methods for testing PM10 and equivalent methods for testing formaldehyde and methanol).

¹³³ 42 U.S.C. §§ 7413(a)(1), (a)(3), (b)(1), (b)(2).

¹³⁴ See 42 U.S.C. § 7604(f) (defining the scope of citizen suit actions).

¹³⁵ For example, in 2014, residents of West Monroe, Louisiana publicized their ongoing concerns regarding large amounts of fugitive dust released from the Bayou Wood Pellet Plant. See Zach Parker, Homeowners Seek EPA’s Help with Pollution Complaints, *The Ouachita Citizen* (Nov. 5, 2014), http://www.hannapub.com/ouachitacitizen/news/local_state_headlines/homeowners-seek-epa-s-help-with-pollution-complaints/article_5d11a19e-650b-11e4-8331-001a4bcf6878.html (Attachment OO).

¹³⁶ Mississippi Department of Environmental Quality, Notice of Violation for Enviva Pellets Amory at 1 (May 23, 2017) (Attachment PP).

¹³⁷ Monroe Journal, Amory Board of Alderman Discusses Deficit, Dust Complaints and a Tank at PDF 4 (Oct. 13, 2016) (Attachment QQ).

¹³⁸ North Carolina DEQ, Enviva Northampton Public Hearing Audio, at 29:04 (dust complaint by Anthony Robinson) (Aug. 20, 2019), available at <https://deq.nc.gov/about/divisions/air-quality/air-quality-permitting/wood->

the fact that the owner/operator of the proposed pellet mill does not have a track record in this industry, ORCAA should take a proactive stance to protect those living nearby from fugitive dust, those working and attending school at the three schools nearby the proposed pellet mill, as well as the airshed of the nearby airport.

Major sources of fugitive dust at wood pellet plants include wood handling, wood storage piles, conveyor transfer points, yard dust, haul road dust, and engine exhaust.¹³⁹ Health problems associated with exposure to particulate matter pollution primarily involve damage to the lungs and respiratory system due to inhalation. Specifically, the inhalation of dust particles can irritate the eyes, nose, and throat; cause respiratory distress, including coughing, difficulty breathing, and chest tightness; increase the severity of bronchitis, asthma, and emphysema; cause heart attacks and aggravate heart disease; and lead to premature death in individuals with serious lung or heart disease.¹⁴⁰ When exposed repeatedly over a longer time period, fugitive dust exposure can lead to severe illness such as cancer.¹⁴¹ In addition to affecting human health, fugitive dust reduces visibility, affects surface water, reduces plant growth, and can be a nuisance.

The proposed conditional approval merely includes a provision requiring the permit applicant to have a “dust prevention plan,” which is one of the eight plans required in the draft approval order.¹⁴² Thus, there are no conditions for the public to review and comment on or enforce that will resolve the fugitive dust issues that come from operation of a wood pellet plant. To address these concerns and provide for the protection of nearby communities, ORCAA must amend the proposed conditional approval conditions to include actual stringent requirements tailored to wood pellet operations in order to prevent fugitive dust emissions from becoming airborne. These include requiring windbreaks or enclosed structures for storage piles, minimizing drop heights and transfer points, and watering or coverings where necessary.

E. The Opacity Monitoring is Not Effective to Detect and Remedy Excess Emissions.

The proposed approval conditions contain one method to monitor visible emissions in order to detect excess particulate matter emissions: the facility is required to conduct Method 9 tests for the drying line and pellet mill.

The requirement fails to specify when and how frequently testing must be conducted, so the provisions are vague and unenforceable. Additionally, testing requirements must be periodic because merely requiring initial compliance testing, and no Method 9 observation on any of the other units, would be insufficient to ensure compliance with the opacity limits. Visible emissions

pellet-industry-permitting-actions-and; *see id.* at 2:02:19 (dust complaint by Sybaleen Auston) (discussing her family’s history of COPD, asthma, and allergies, and stating that “[w]e deal with enough—the air we’re breathing, the traffic from the trucks, the grit, dirt on the cars, homes”), 2:35:23 (dust complaint by Richard Harding) (discussing his health issues and stating, “I cannot deal with dust [from the plant]”).

¹³⁹ British Columbia, Ministry of the Environment, Air Emissions Fact Sheet: Wood Pellet Manufacturing Facilities (July 2011) (Attachment RR).

¹⁴⁰ New Hampshire Department of Environmental Services, Environmental Fact Sheet, Fugitive Dust, *available at* <https://www.des.nh.gov/land/roads/fugitive-dust> (Attachment SS); *see also* Stelte, *supra* n.40, at 6.

¹⁴¹ Stelte, *supra* n.40, at 6.

¹⁴² Preliminary Determination, at 39-40, (Recommended Conditions of Approval ¶ 13).

are generally caused by malfunctions and poor operating practices; these issues are least likely to occur when the facility has been aware of the date of stack testing and been able to optimize operations in advance. Finally, nothing in the proposed approval order requires any Method 9 observations at any time for any unit other than the RTO and RCO.

In short, nothing in the proposed approval order requires this facility to take any specific measures to determine the degree of opacity and compliance with the 20% opacity limits. Merely requiring vague compliance by including the test method is not an effective or enforceable way to limit visible emissions and comply with the opacity standards.

ORCAA must require visible emissions monitoring that at least requires daily monitoring consistent with Method 9 that determines the degree of opacity and whether or not the facility is complying with the opacity limits. In particular, we encourage ORCAA to follow the method established by Georgia in the permit condition for a wood pellet mill set out below:¹⁴³

¹⁴³ Georgia EPD, Draft Part 70 Operating Permit No. 2499-161-0023-V-02-4 for Hazlehurst Wood Pellets, at Condition 5.2.8 at 12-13 (Sept. 2019) (Attachment TT).

- 5.2.8 The Permittee shall perform daily checks of visible emissions from Log Storage/Handling, Debarking/Screening, Chipper, and Chip Piles (WOOD); Green Hammermills (GHM1&2); Furnace/Dryer RTO stack (S1), and the Dry Hammermill/Press/Cooler RCO stack (S2) while the underlying process equipment is operating at the normal, expected operating rate using the procedures below, except when atmospheric conditions or sun positioning prevent any opportunity to perform a VE check. The Permittee shall retain a record in a daily visible emissions (VE) log suitable for inspection or submittal.

[391-3-1-.02(6)(b)1]

- a. Determine, in accordance with the procedures specified in paragraph d of this condition, if visible emissions are present at the discharge point to the atmosphere and record the results in the daily VE log. For sources that exhibit visible emissions, the Permittee shall comply with paragraph b of this condition.
- b. For each check where a stack is determined to be emitting visible emissions, a qualified observer shall determine whether the emissions equal or exceed a 20% opacity action level, using the procedure specified in paragraph d of this condition. For the purposes of this condition a qualified observer is one that has met the certification requirements of EPA Method 9 – *Visual Determination of the Opacity of Emissions from Stationary Sources*. Also, this determination shall cover a period of six minutes. The results shall be recorded in the daily VE log. For sources that exhibit visible emissions of greater than or equal to the opacity action level of 20%, the Permittee shall comply with paragraph c of this condition.
- c. For each occurrence that requires action in accordance with paragraph b of this condition, the Permittee shall determine the cause of the visible emissions and correct the problem in the most expedient manner possible. The Permittee shall note the cause of the visible emissions, raw material feed rate, and any other pertinent operating parameters as well as the corrective action taken, in the maintenance log.
- d. The person performing the determination shall stand at a distance of at least three stack heights, which is sufficient to provide a clear view of the plume against a contrasting background with the sun in the 140 degree sector at his/her back. Consistent with this requirement, the determination shall be made from a position such that the line of vision is approximately perpendicular to the plume direction. Only one plume shall be in the line of sight at any time when multiple stacks are in proximity to each other.

F. The Proposed Approval Conditions Are Utterly Devoid of a Mechanism to Monitor Facility-Wide Emissions and Compliance with PTE Limits.

The proposed approval conditions contain conditions that include facility-wide annual limits.¹⁴⁴ Nothing in the draft approval order, however, explicitly requires the permit applicant to monitor its emissions or explain how the company shall do so. For instance, the conditions are silent on what emission factors the permit applicant shall use and which sources must be included in the plantwide calculation. In order to be enforceable, PTE limits such as those in the proposed approval conditions must be accompanied by appropriate monitoring, recordkeeping, and reporting such that compliance can be ascertained at any time.¹⁴⁵ While source testing and parametric monitoring are necessary aspects of such monitoring, they do nothing to monitor emissions on a rolling basis.

¹⁴⁴ Preliminary Determination, at 36, (Recommended Conditions of Approval ¶ 7).

¹⁴⁵ *In the Matter of Orange Recycling & Ethanol Prod. Facility, Pencor-Masada Oxynol, LLC*, Order on Petition No. II-2001-05 (April 8, 2002), at 7, available at https://www.epa.gov/sites/production/files/2015-08/documents/masada-2_decision2001.pdf.

EPA has explained the underlying principle behind the monitoring that must accompany practically enforceable PTE limits:

In order to be considered practically enforceable, an emissions limit must be accompanied by terms and conditions that require a source to effectively constrain its operations so as to not exceed the relevant emissions threshold. These terms and conditions must also be sufficient to enable regulators and citizens to determine whether the limit has been exceeded and, if so, to take appropriate enforcement action.¹⁴⁶

Without including an enumeration of the specific algorithms and emission factors the permit applicant shall use to monitor its emissions in between stack tests, the proposed conditions do not “enable regulators and citizens to determine whether” the facility is complying with the emission limits. Specifically, it is not clear whether the permit applicant will include emissions from insignificant activities (as is required by law¹⁴⁷), or how the permit applicant must quantify emissions from sources like the handling and storage operations, for which there is no requirement to track throughput or emissions.

IX. ORCAA Cannot Rely on the Project’s Invalid Determination of Non-Significance to Meet its SEPA Obligations.

On July 25, 2023, the City of Hoquiam issued a Determination of Non-Significance (“DNS”) for PNWRE’s proposal to build its industrial wood pellet facility, a decision that exempted the proposal from full review under the State Environmental Policy Act (“SEPA”), RCW 43.21C. The PNWRE DNS review was limited to the immediate environmental impacts of constructing and operating the facility; it is deeply flawed in at least two major respects: (1) it contains serious errors even in its limited calculations with respect to air pollution emissions at the facility, including greenhouse gases, VOCs, and HAPs, and (2) it fails to conduct a lifecycle greenhouse gas analysis of the direct and indirect greenhouse gas impacts of producing, transporting, and burning the wood pellets.

A. Legal Requirements.

SEPA “sets forth a state policy of protection, restoration and enhancement of the environment.” *Polygon Corp. v. City of Seattle*, 90 Wn.2d 59, 63 (1978); RCW 43.21C.010. SEPA’s policies and goals overlay and add to existing authorizations of all branches of government. RCW 43.21C.060. The purpose of an Environmental Impact Statement (“EIS”) is to ensure that SEPA’s policies are an integral part of the actions of state and local government such that the EIS is actually used by, and informs the decision of, those government agencies. WAC 197-11-400. “The primary function of an EIS is to identify adverse impacts to enable the

¹⁴⁶ *Id.* (emphasis added); see also *In re Piedmont Green Power, LLC*, Order on Petition No. IV-2015-2, at 14 (Dec. 13, 2016), available at https://www.epa.gov/sites/production/files/2016-12/documents/piedmont_response2015.pdf.

¹⁴⁷ The definition of PTE does not make any exceptions for emissions deemed insignificant. 40 C.F.R. § 52.21(b)(4). In determining compliance with PTE limits, sources such as the proposed pellet mill must include all non-fugitive emissions.

decision-maker to ascertain whether they require either mitigation or denial of the proposal.” *Victoria Tower P’ship v. City of Seattle*, 59 Wn. App. 592, 601 (1990).

SEPA and its implementing regulations explicitly require consideration of direct and indirect climate impacts. See RCW 43.21C.030(f) (directing agencies to “recognize the world-wide and long-range character of environmental problems”). Under SEPA, an agency must consider both the direct and “indirect” impacts of its decision. WAC 197-11-060(4)(d) (“Impacts include those effects resulting from growth caused by a proposal, as well as the likelihood that the present proposal will serve as a precedent for future actions.”). “In assessing the significance of an impact, a lead agency shall not limit its consideration of a proposal’s impacts only to those aspects within its jurisdiction, including local or state boundaries.” WAC 197-11-060(4)(b); *Cheney v. City of Mountlake Terrace*, 87 Wn.2d 338, 344 (1976) (“Implicit in the statute is the requirement that the decision makers consider more than what might be the narrow, limited environmental impact of the immediate pending action. The agency cannot close its eyes to the ultimate probable environmental consequences of its current action.”) For projects involving the transportation or use of fuels like wood pellets, SEPA (like its federal counterpart, NEPA) must consider the lifecycle impacts of producing, transporting, and using such fuels.¹⁴⁸ *Columbia Riverkeeper v. Cowlitz Cty.*, 2017 WL 10573749, at *7-10 (SHB Sept. 15, 2017) (EIS for methanol project invalid for failing to consider lifecycle GHG emissions); WAC 197-11-444(1)(b)(iii) (listing “climate” among elements of environment to be considered in SEPA).

B. The DNS Air Emission Calculations Are Wrong.

As discussed throughout these comments, the air emission calculations in the Application are wrong in numerous and significant ways. These same calculation errors and omissions are reflected in the DNS, leading to a major under-calculation of air emissions. These errors render the DNS invalid, and ORCAA must undertake a new and full environmental review before it considers the requested construction permit.

C. The DNS Did Not Disclose and Consider All Climate Impacts From Greenhouse Gas Emissions.

PNWRE failed to review all direct and indirect greenhouse gas emissions in its SEPA Checklist. NOC Application, Appendix A. The SEPA Checklist arrives at a total greenhouse gas emission estimate of 163,592 tons CO_{2e} annually. NOC Application Table 1. The calculations do not include truck emissions to and from wood sources, marine vessel transportation emissions to and from ports in Japan and Asia, and the ultimate burning of the fuel in industrial power plants.

This failure to calculate and consider the full lifecycle greenhouse gas emissions violates SEPA, and ORCAA cannot validly rely on such a flawed analysis. Because the DNS fails to account for the total expected greenhouse gas emissions caused by the PNWRE proposal, and because those emissions will have a significant and detrimental environmental impact, the DNS is invalid, and ORCCA cannot rely on it to issue the requested Notice of Construction Application.

¹⁴⁸ NEPA and its implementing case law are used in Washington to discern the meaning of SEPA. *Kucer v. State Dep’t of Transp.*, 140 Wn.2d 200, 215-16 (2000).

D. ORCAA Must Deny the NOC Application and Undertake Its Own Full SEPA Review of the Project's Air Emissions.

ORCAA cannot rely on this invalid DNR to meet its own SEPA obligations. Instead, ORCAA must deny the NOC Application and conduct its own SEPA review in an EIS that validly reviews the significant air pollution caused by this project, including all VOCs, HAPs, and greenhouse gas lifecycle emissions.

This would not be the first time that a Washington Clean Air Agency has needed to undertake its own analysis to comply with SEPA. Recently, the Puget Sound Clean Air Agency ("PSCAA") initiated and completed its own supplemental environmental review for a proposed liquefied natural gas terminal in Tacoma because the final EIS for that project did not consider lifecycle greenhouse gas emissions. *See* <https://psccleanair.gov/636/PSE---LNG-Facility-Tacoma>. PSCAA used the supplemental EIS in its review of the NOC Application. ORCAA must take similar steps here to comply with SEPA.

Conclusion

In short, ORCAA cannot validly finalize the proposed Approval Order. To issue an Approval Order with the recommended conditions of approval as proposed would not only be unlawful under the authority granted under the EPA-approved SIP and the federal Clean Air Act, but would conflict with the State's requirements for assessment and control of hazardous air pollutants. As discussed in these comments, the permit application is materially incomplete because the following are missing: the required PSD applicability determination for classification as a fuel conversion plant; and accounting for VOC and CO emissions from the five wood pellet storage silos. The permit application also includes a woefully inadequate estimate for HAPs, which must be revised, and a case-by-case MACT determination conducted. Furthermore, there are numerous emission units and emission sources missing from the permit application. The permit application fails to address the Act's regional haze requirements. Critically, the permit application's State-BACT determinations are flawed and incomplete. Those flawed determinations do not reflect State-BACT requirements.

Moreover, when the facility-wide potential to emit calculations are corrected and the missing units are added, the proposed pellet mill triggers major source PSD for several pollutants (at both the 100 TPY and 250 TPY thresholds). Based on the revised facility-wide potential to emit estimates and additional comments, the proposed pellet mill would be:

- A major source of HAPs (and required to conduct a case-by-case Maximum Achievable Control Technology analysis and determination)
- Trigger PSD major source requirements for CO emissions (at both the 100 TPY and 250 TPY thresholds)
- Trigger PSD major source requirements for VOCs (at the 100 TPY threshold)
- Trigger PSD major source requirements for NO_x (at the 100 tpy threshold)
- Trigger PSD major source requirements for PM (at the 100 tpy threshold)

Since the proposed pellet mill appears to be a major stationary source and subject to the requirements of the PSD permit program, ORCAA's issuance of the proposed approval order would be contrary to the Congressional purposes of the PSD program to:

- Protect health and welfare;
- Preserve and protect the air quality in Washington's national parks;
- Insure that economic growth will occur in a manner consistent with the preservation of existing clean air resources; and
- Assure that any decision to permit increased air pollution is made only after careful evaluation of all the consequences of such a decision.

Therefore, ORCAA must either deny the request for construction and withdraw its proposed Approval Order or require that the permit applicant submit a full and complete application addressing the myriad defects providing all required analysis and documentation. Should ORCAA (or Washington Department of Ecology) repropose an approval order, it must disclose all of the underlying information to the public.

Sincerely,

Colin Deverell
Northwest Senior Program Manager
National Parks Conservation Association
1200 Fifth Ave., Ste. 1118
Seattle, WA 98101
cdeverell@npca.org

Ulla Reeves
Interim Director, Clean Air Program
National Parks Conservation Association
775 Haywood Road, Suite A
Asheville, NC 28806
ureeves@npca.org

Caitlin Miller
Associate General Counsel, Clean Air and Climate
National Parks Conservation Association
P.O. Box 101705
Denver, CO 80250
cmiller@npca.org

Sara L. Laumann
Principal
Laumann Legal, LLC
3800 Buchtel Blvd. S. #100236
Denver, CO 80210
sara@laumannlegal.com
Counsel to NPCA

Kristen Boyles
Managing Attorney
Earthjustice
810 Third Ave., Suite 610
Seattle, WA 98104
kboyles@earthjustice.org

John Bridge
President
Olympic Park Advocates
333 N. Govan Ave.
Sequim, WA 98382-3438
jbridge@olypen.com

cc:

Kathy Taylor, Program Manager, Air Quality Program, Washington Department of Ecology, Kathy.Taylor@ecy.wa.gov
Cooper Garbe, Washington Department of Ecology, Cooper.Garbe@ecy.wa.gov
Krishna Viswanathan, Director, Air and Radiation Division, EPA Region 10, Viswanathan.Krishna@epa.gov
Karl Pepple, PhD, QEP, Manager, Air Permits and Toxics Branch, EPA Region 10, Pepple.Karl@epa.gov

**Attachments to NPCA, Earthjustice, and Olympic Park Advocates Comments on
ORCAA, New Source Preliminary Determination to Approve, Wood Pellet Manufacturing
Facility, Pacific Northwest Renewable Energy, LLC**

- A ORCAA, New Source Preliminary Determination to Approve, Wood Pellet Manufacturing Facility, Pacific Northwest Renewable Energy, LLC, No. 23NOC1606 (Nov. 30, 2023).
- B National Park Service, Olympic National Park, Environmental Factors.
- C National Park Service, Mount Rainier National Park, Air Quality.
- D Port of Grays Harbor Wood Pellet Plant, Notice of Construction Permit Application (July 2023).
- E Excerpt from EPA-approved SIP rules for ORCAA, 40 C.F.R. part 52.2470(c) Table 8 – Additional Regulations Approved for the Southwest Clean Air Agency (SWCAA) Jurisdiction.
- F EPA Approved Regulations in the Washington SIP.
- G Permit Application, Appendix A, NOC Application Forms and SEPA Documentation.
- H EPA Memorandum from Edward J. Lillis, Chief Permits Programs Branch, AQMD, to George T. Czerniak, Chief Air Enforcement Branch, Region V, Applicability of Prevention of Significant Deterioration (PSD) and New Source Performance Standards (NSPS) to the Cleveland Electric, Incorporated, Plant in Willoughby, Ohio (May 26, 1992).
- I EPA Letter from C.J. Sheehan, Office of Regional Counsel, EPA Region 6 to M. Cathey, Managing Director, El Paso Energy Bridge Gulf of Mexico (Oct. 28, 2003).
- J EPA Memorandum from Kent Berry, Director Policy Analysis Staff, U.S. EPA, to Asa B. Foster, Jr., Director, Air and Hazardous Materials Division, U.S. EPA Region IV, "Clarification of Sources Subject to Prevention of Significant Deterioration (PSD) Review" (Jan 20, 1976).
- K EPA Memorandum from Racqueline Shelton, Group Leader, Integrated Implementation Group, to Guy Donaldson, Acting Chief, Air Permits Section, EPA Region 6, Request for Guidance on the Definition of Fuel Conversion Plants for Purposes of Prevention of Significant Deterioration (PSD) (July 31, 2003).
- L EPA Letter from Gregg M. Worley, Chief Air Permits Section, EPA Region 4, to E.A. Veronica Barringer, Bureau of Air Quality, South Carolina Department of Health and Environmental Services (June 4, 2007).

- M EPA Letter from Donald Dossett, P.E., Manager Stationary Source Unit, EPA Region 10, to Claudia Davis, Western Region Air Quality Manager, Oregon Department of Environmental Quality (Sept. 26, 2017).
- N Georgia EPD Memorandum re: Emission Factors for Wood Pellet Manufacturing (Jan. 29, 2013).
- O Georgia EPD, SIP Construction Permit and Title V Significant Modification Application Review for Hazlehurst Wood Pellets (Sept. 2019).
- P Permit Application, Appendix C, Emission Calculations.
- Q Urban R.A. Svedberg, *et al.*, *Emissions of Hexanal and Carbon Monoxide from Storage of Wood Pellets, a Potential Occupational and Domestic Health Hazard*, 48 Ann. Occup. Hyg., No. 4, 339 (2004).
- R Lydia Soto-Garcia, *et al.*, *Exposures to Carbon Monoxide from Off-Gassing of Bulk Stored Wood Pellets*, Center for Air Resources Engineering and Science, Clarkson University (2014).
- S Mohamad Arifur Rahman, *et al.*, *Carbon Monoxide Off-Gassing From Bags of Wood Pellets*, 62 Annals of Work Exposures and Health, Issue 2, 248 (2017).
- T Jaya Shankar Tumuluru, *et al.*, *Analysis on Storage Off-Gas Emissions From Woody, Herbaceous, and Torrefied Biomass*, 8 Energies 1745, 1751 (March 2, 2015).
- U Xingya Kuang, *et al.*, *Rate and Peak Concentrations of Off-Gas Emissions in Stored Wood Pellets—Sensitivities to Temperature, Relative Humidity, and Headspace*, 53 Ann. Occup. Hyg., No. 8, 789 (2009).
- V Wolfgang Stelte, Danish Technological Institute, *Guideline: Storage and Handling of Wood Pellets* (Dec. 2012).
- W New York State Department of Health, Carbon Monoxide (CO) Hazards from Wood Pellet Storage.
- X Letter from Patrick J. Anderson, Southern Environmental Center, Heather Hillaker, Southern Environmental Law Center, to Lauren Whybrew, ORCAA, “Hazardous Air Pollutant (HAP) Deficiencies in Preliminary Determination for Pacific Northwest Renewable Energy LLC (PNWRE),” (Jan. 8, 2024).
- Y Enviva Pellets Wiggins, LLC, Air Emission Test Report (Oct. 31, 2013).
- Z Enviva Pellets Amory, LLC, Air Emission Test Report (Oct. 31, 2013).

- AA Letter from Jennifer Pohlman, Senior Consultant, Trinity Consultants, to Danny Phipps, Air Quality Engineer 1, Southwest Clean Air Agency, Completeness Determination for ADP Application CO-1057 dated August 25, 2022 (March 29, 2023).
- BB Air Control Techniques, Air Emissions Test Report for Enviva Pellets Greenwood (April 4, 2019).
- CC Permit Application, Appendix D, Vendor Information.
- DD ORCAA, Instructions for Form 6, Best Available Control Technology (BACT).
- EE Enviva Pellets Lucedale, Application for Initial State Permit to Construct, at 3.7.2 and 3.7.3. (Sept. 2018).
- FF Permit Application, Appendix F, Model Inputs and Outputs.
- GG EPA, Air Quality Dispersion Modeling - Preferred and Recommended Models, Memo on release of this version (Oct. 12, 2023).
- HH Hazlehurst Wood Pellets in Georgia.
- II Letter from Keith W. Turner, legal counsel for Amite Bioenergy, to Tim Aultman, Environmental Compliance & Enforcement Division, MDEQ (Nov. 5, 2018).
- JJ North Carolina DEQ, Air Quality Permit No. 10365R03 for Enviva Pellets Hamlet, LLC (Jan. 14, 2019).
- KK North Carolina DEQ, Air Quality Permit No. 10386R04 for Enviva Pellets Sampson, LLC (Oct. 2, 2019).
- LL North Carolina DEQ, Air Quality Permit No. 10203R06 for Enviva Pellets Northampton, LLC (Oct. 30, 2019).
- MM Environmental Integrity Project, Dirty Deception: How the Wood Biomass Industry Skirts the Clean Air Act (April 26, 2018).
- NN U.S. EPA, Guidance Limiting Potential to Emit in New Source Permitting (June 13, 1989).
- OO Zach Parker, Homeowners Seek EPA's Help with Pollution Complaints, The Ouachita Citizen (Nov. 5, 2014).
- PP Mississippi Department of Environmental Quality, Notice of Violation for Enviva Pellets Amory (May 23, 2017).

- QQ Monroe Journal, Amory Board of Alderman Discusses Deficit, Dust Complaints and a Tank (Oct. 13, 2016).
- RR British Columbia, Ministry of the Environment, Air Emissions Fact Sheet: Wood Pellet Manufacturing Facilities (July 2011).
- SS New Hampshire Department of Environmental Services, Environmental Fact Sheet, Fugitive Dust (2014).
- TT Georgia EPD, Draft Part 70 Operating Permit No. 2499-161-0023-V-02-4 for Hazlehurst Wood Pellets (Sept. 2019).
- UU Sami Yassa and Nathanael Greene (2021), *A Bad Bet for Biomass: Why the Leading Approach to Biomass Energy with Carbon Capture and Storage Isn't Carbon Negative*, available at <https://www.nrdc.org/sites/default/files/bad-biomass-bet-beccs-ib.pdf>.
- VV William H. Schlesinger, *Are wood pellets a green fuel? A return to firewood is bad for forests and for the climate*, (March 23, 2018), available at <https://www.science.org/doi/abs/10.1126/science.aat2305>.
- WW Alexander C. Kaufman, A 'Green' Energy Project Leaves A Mississippi Town Gasping For Air (Dec. 20, 2021), available at https://www.huffpost.com/entry/biomass-energy-power-plants_n_61bcb6cae4b0a3722477d16a.
- XX Dr. Christopher A. Williams, Ph.D. Forest Clearing Rates in the Sourcing Region for Enviva Pellet Mills in Virginia and North Carolina, U.S.A (Dec. 7, 2021), available at <https://southernenvironment.sharefile.com/share/view/s322e5dc731984235ab391a16115a7d21>.
- YY Southern Environmental Law Center, *Satellite images show link between wood pellet demand and increased hardwood forest harvesting* (2022), available at <https://www.southernenvironment.org/wp-content/uploads/2022/03/Biomass-White-Page.pdf>.



**Olympic Region
Clean Air Agency**

2940 Limited Lane NW
Olympia, WA 98502

(360) 539-7610
Or 1-800-422-5623
Fax: (360) 491-6308

www.ORCAA.org

Executive Director
Jeff C. Johnston

*Serving Clallam,
Grays Harbor, Jefferson,
Mason, Pacific, and*

NEW SOURCE PRELIMINARY DETERMINATION to APPROVE:

**Wood Pellet Manufacturing
Facility**

**Pacific Northwest Renewable Energy,
LLC**

23NOC1606

November 30, 2023

Table of Contents

1. Summary.....	1
2. Regulatory Background	1
3. Application Background.....	3
4. Description of Proposed Facility	3
5. Air Pollutant Emissions	13
6. Administrative Requirements for NOC Applications	18
7. SEPA Review	18
8. Criteria for Approval	19
9. Applicable Performance Standards (Summary).....	19
10. Best Available Control Technology (BACT)	25
11. Ambient Impact Analysis (Criteria Pollutants).....	27
12. Ambient Impact Analysis (Toxic Air Pollutants)	27
13. Requirements for Major Stationary Sources and Major Modifications to Major Stationary Sources	30
14. Title V Air Operating Permit (AOP) Implications.....	30
15. Environmental Justice Considerations.....	30
16. Recommended Conditions of Approval.....	33
17. Preliminary Determination to Approve	41



NOTICE OF CONSTRUCTION PRELIMINARY DETERMINATION TO APPROVE

Olympic Region Clean Air Agency

Issued to:	Pacific Northwest Renewable Energy, LLC	County:	Grays Harbor
Location:	411 Moon Island Road, Hoquiam	Source:	926
		RC:	OP1
Application #:	23NOC1606	File:	432
Prepared on:	November 30, 2023		

1. Summary

Pacific Northwest Renewable Energy (PNWRE) seeks approval from Olympic Region Clean Air Agency (ORCAA) to construct a new wood pellet manufacturing facility at 411 Moon Island Road in Hoquiam, Washington. The proposed facility would emit air pollution from combustion of woody biomass and wood processing activities and, therefore, triggers approval by ORCAA through an air permit application prior to commencement of construction. PNWRE submitted an air permit application to ORCAA, which was determined complete on September 11, 2023. ORCAA staff reviewed PNWRE's application and concluded that the proposed facility meets criteria for approval in Washington and, therefore, may be conditionally approved. Recommended conditions of approval are detailed in Section 16 of this Preliminary Determination.

2. Regulatory Background

Pursuant to the Washington Clean Air Act under chapter 70A.15 of the Revised Code of Washington, ORCAA's Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c)¹ require New Source Review (NSR) for new stationary sources of air pollution (referred to as new sources) in ORCAA's jurisdiction. NSR is also required prior to installing, replacing, or substantially altering any air pollution control technology. NSR generally refers to the process of evaluating air quality impacts and the likelihood of compliance with applicable air regulations and standards. NSR and approval of an air permit by ORCAA is required prior to commencing construction or modification of any new source or prior to installing, replacing, or substantially altering air pollution control technology. The goal of NSR is to assure compliance with applicable air regulations and standards, including equipment performance standards and ambient air quality standards.

¹ A State Implementation Plan (SIP) is a collection of regulations and documents used by a state, territory, or local air district to implement, maintain, and enforce the National Ambient Air Quality Standards, or NAAQS, and to fulfill other requirements of the federal Clean Air Act. The Clean Air Act requires the EPA to review and approve all SIPs. ORCAA's SIP was last approved by EPA in 1995.

NSR is initiated by a project proponent submitting an air permit application referred to as a Notice of Construction (NOC) application², which provides ORCAA information on the proposed project of sufficient detail to characterize air impacts. NOC applications are posted on ORCAA's website and may undergo a public notice and comment period if requested by the public or if emissions increases trigger an automatic public notice. Approval of a NOC in an attainment or unclassifiable area³ is contingent on verifying a proposed project meets the following criteria from ORCAA's Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6:

1. **Performance Standards** – The new stationary source will likely comply with applicable air-performance standards such as federal new source performance standards (NSPS), national emission standards for hazardous air pollutants (NESHAPs), or any performance standards adopted under chapter 70A.15 RCW;
2. **BACT** – The new stationary source will employ “Best Available Control Technology” (BACT) to control all air pollutants emitted;
3. **RACT** – Replaced or substantially altered air pollution control technology meets the standard of “Reasonably Available Control Technology” (RACT) as defined in ORCAA Rule 1.4;
4. **Ambient Air Quality** – Emissions from the new stationary source will not cause or contribute to a violation of any ambient air quality standard;
5. **Federal Air Permitting Requirements** – The new stationary source secures all applicable federal air permits that may apply; and,
6. **Air Toxics** – If there are increases in toxic air pollutant (TAP) emissions, the requirements of Washington's Controls for New Sources of Toxic Air Pollutants under Chapter 173-460 WAC are met.

In this case, PNWRE is proposing to construct a new “greenfield” wood pellet manufacturing facility in Hoquiam, Washington. The proposed facility would rely on combustion of woody biomass as the primary source of heat, which results in air pollutant emissions. It would also include wood processing activities that generate dust. At the production rates proposed by PNWRE, air emission rates from both activities are significant and trigger the requirement to secure ORCAA's approval through a NOC application prior to commencement of construction.

² There are two categories of NOC applications: Notice of Construction (NOC) and Notice of Construction Revision (NOR). NOCs are required for new or modified sources, new control technology, replacing an existing stationary source or control technology, and substantially altering control technology. NORs are required when an owner or operator requests a revision to an existing air permit issued by ORCAA.

³ Unclassified area or “attainment area” means an area that has not otherwise been designated by EPA as nonattainment with ambient air quality standards for a particular regulated pollutant. Attainment area means any geographic area in which levels of a given criteria air pollutant (e.g., ozone, carbon monoxide, PM₁₀, PM_{2.5}, and nitrogen dioxide) meet the health-based National Ambient Air Quality Standards (NAAQS) for that pollutant. An area may be an attainment area for one pollutant and a nonattainment area for others.

3. Application Background

- Application received: July 20, 2023
- SEPA lead agency: City of Hoquiam
- SEPA determination: Determination of Non-Significance, #SEPA 2023-02, July 24th, 2023
- 1st Application addendum received: 8/11/2023 (requested 8/4/2023)
- 2nd Application addendum received: 9/6/2023 (requested 8/25/2023)
- Application declared complete: 9/11/2023
- Notification that natural gas will not be used as startup fuel: 9/27/2023
- 3rd Application addendum received: 10/25/2023 (requested 10/3/2023)

4. Description of Proposed Facility

PNWRE's NOC application thoroughly describes the proposed wood pellet manufacturing facility including equipment, operations, emissions units and air impacts. The following is a brief description of the facility and is intended as an overview.

4.1 Proposed Location

The proposed wood pellet manufacturing facility will be located on an approximately 60-acre parcel in the city of Hoquiam, Washington. The facility is designed to produce, store, and export up to 440,800 short tons per year (TPY) of wood pellets and is intended to operate at least 8,000 hours per year. The proposed location is adjacent to the Willis Enterprises Moon Island Chip Mill (Willis Enterprises) and near Terminal 3 at the Port of Grays Harbor.

Figure 1: Proposed Location



* Imagery ©2018 Google, Maps data ©2018 Google

** Annotated by ORCAA

4.2 Ambient Air Quality

ORCAA works cooperatively with the Washington State Department of Ecology (Ecology) and the regional United States Environmental Protection Agency (EPA) to measure criteria ambient air pollutants, meteorological parameters, and other air-related data. ORCAA is also a member of the Washington Air Monitoring Work Group, which makes recommendations to Washington Air Quality Managers Group regarding air monitoring programs, including ambient air monitoring site locations. ORCAA currently operates and maintains air monitoring equipment for measurement of three of the six criteria pollutants in various locations in its jurisdiction: particulate matter (PM_{2.5}), ozone (O₃), and carbon monoxide (CO).

ORCAA does not maintain any permanent monitors in Hoquiam but does operate a PM_{2.5} monitor in nearby Aberdeen, WA. A temporary federal reference method (FRM) PM_{2.5} monitor was installed at Harbor High School in Aberdeen between August 18, 2002, and December 29, 2003. No violations of the daily or annual PM_{2.5} NAAQS were recorded during this time. As a permanent FRM was not installed in Aberdeen, the region is officially considered “unclassified” with regards to PM_{2.5} attainment status. A nephelometer has been used to monitor PM_{2.5} at Harbor High School in Aberdeen for the past 20 years. Nephelometer based PM_{2.5} was verified by the previously mentioned FRM data during the period when both monitors were collocated in Aberdeen.

Because of the absence of FRM monitoring, Grays Harbor County is officially considered “unclassified” with respect to the National Ambient Air Quality Standards (NAAQS). However, based on the number and size of air pollution sources and other monitoring data, ambient air quality in Hoquiam and Aberdeen is assumed to be generally good. Areas that are unclassified with respect to the NAAQS are regulated the same way as areas officially classified as “attainment.”

4.3 Facility Overview

The facility is designed with three truck tippers; a chips cleaning line; two wet hammer mills; one hog fuel furnace and dryer; four dry hammer mills; 12 pellet mills; five wood pellet storage silos; and a covered conveyor system to deliver wood pellets to the existing Willis Enterprises conveyance system and ship loadout facility. Air pollution control systems are proposed for all point sources of air emissions. Descriptions of stationary sources of air emissions and air pollution controls proposed are summarized in the following table. The proposed emergency generator, Source ID GEN-01, will be less than 500 horsepower and therefore is categorically exempt from New Source Review per ORCAA Rule 6.1(c)(28)(ii). It is included in the table below for informational purposes only.

Table 1: Emissions Sources

Emission Source ID	Emission Source	Exhaust Rate (cfm)	Fugitive or Point?	Air Pollution Controls
TD-01	Truck Dumper – White Wood	N/A	Fugitive	Dust Control Plan: <ul style="list-style-type: none"> 10 miles per hour (mph) speed limit for all mobile vehicles Applying water where needed via water truck or other means Using a vacuum truck as needed
TD-02	Truck Dumper – Chips			
TD-03	Truck Dumper – Hog Fuel			
SP-01	Storage Pile – White Wood			
SP-02	Storage Pile – Chips			
SP-03	Storage Pile – Hog Fuel			
VEH-01	Vehicle Traffic – Trucks			
VEH-02	Vehicle Traffic – Front End Loaders			
EP-01.1	Chip Cleaning Line	36,334	Point & Fugitive	Cyclo-filter capable of 10 mg/Nm3 (.0044 gr/scf)
EP-01.2	White Wood Disc Screening	N/A	Fugitive	None
EP-01.3	Hog Fuel Feed	N/A	Fugitive	None
EP-02	Wet Hammer Mill 1	10,219	Point	Cyclo-filter capable of 10 mg/Nm3 (.0044 gr/scf)
EP-03	Wet Hammer Mill 2	10,219	Point	Cyclo-filter capable of 10 mg/Nm3 (.0044 gr/scf)
EP-04	Drying Line (furnace, drum dryer)	103,229	Point	Cyclones (2 units in parallel) WESP RTO
EP-05	Dry Product Intermediate Storage 1	852	Point	Passive Filters
EP-06	Dry Product Intermediate Storage 2	852	Point	Passive Filters
EP-07	Dry Hammer Mills (4 units)	99,795	Point	Cyclo-filters (4 units serving dry hammer mills) Cyclo-Filters (2 units, one serving each pellet cooler) RCO (Serving exhaust from all)
EP-08	Pelletizers (12 units) Pellet Coolers (2 units)		Point	
EP-09	Milled Dry Product Intermediate Storage	852	Point	Silo vent filters
EP-10	Pellet Storage Silo #1	15,635	Point	Storage silo venting to maintain low pellet temperatures – equipped with silo vent filters
EP-11	Pellet Storage Silo #2	15,635	Point	
EP-12	Pellet Storage Silo #3	15,635	Point	
EP-13	Pellet Storage Silo #4	15,635	Point	
EP-14	Pellet Storage Silo #5	15,635	Point	
EP-15	Truck Loadout	N/A	Fugitive	Silo Filter and shrouded dump chute
GEN-01	Emergency Generator (<500 HP) ¹	N/A	Point	Tier 4

¹ Categorically exempt from New Source Review per ORCAA Rule 6.1(c)(28)(ii).

4.4 Raw Materials Processing

Raw materials for pellet production and fuel for the furnace will be delivered to the facility via truck and include:

- Forest Residuals consisting of chipped woody biomass from logging operations (referred to as “ground chips”).
- Mill residuals consisting of sawdust and shavings (referred to as “white wood”).
- Biomass fuel (“referred to as hog fuel”), which is an unrefined mix of coarse chips of bark and wood fiber used for fuel.

Trucks delivering raw materials will be emptied via gravity in dedicated truck tippers. The proposed facility includes 3 truck tippers. The biomass will empty into the yard where front-end

loaders will move the material to outdoor storage piles. Approximately 1.7 acres will be dedicated to outdoor storage of fuel and raw material for wood pellet manufacturing. Front-end loaders will transfer raw materials and biomass fuel to dedicated walking-floor bins. A radial stacker/reclaimer system may be installed, which would eliminate fugitive dust and mobile source emissions from front-end loaders.

To minimize dust emissions from vehicle traffic in the yard, PNWRE proposes to implement a dust control plan. The plan will include a 10 miles per hour (mph) posted speed limit for all vehicles and heavy equipment, regularly applying water on road surfaces via water trucks or other means, and using a vacuum truck as needed. The walking floor bins are designed to move the materials to the next phase in their processing. The facility is designed with 3 walking floor bins, each dedicated to a specific raw material stream. From this point onward, all raw material handling processes are fully enclosed.

The walking floor bin for ground chips empties to the chip cleaning line. The chip cleaning line uses a series of scalper rolls to remove dirt, sand and other impurities from the ground chips. The chip cleaning line will also classify the chips by size. The smallest sizes, or fines, will be routed to the dryer feeding system, while the intermediate fraction will be sent to the wet hammer mills for size reduction. Overs are reclaimed and recycled. The chip cleaning line will be enclosed and equipped with a dust capture system that will exhaust through a cyclo-filter dust control unit. Cyclo-filter units are essentially cyclone separator units equipped with an integral fabric filter baghouse to remove particulate from the exhaust. PNWRE's application states that the cyclo-filters proposed for the facility will be capable of controlling particulate emissions down to 0.0044 grains per standard cubic foot of air (gr/scf).

The white wood walking floor bin will discharge to a disc screen that separates larger pieces for further sizing in the wet hammer mills. PNWRE expects the white wood material stream to be relatively free of dust and contaminants. No dust control system is proposed for the disc screen. The screened white wood will be sent to the dryer via conveyor while overs will be sent to wet hammer mills for further size reduction. The white wood disc screening unit is considered a point source of fugitive particulate emissions.

Hog fuel will be off-loaded in its own dedicated truck tipper and then transported via front end loader to a hog fuel pile, which will be uncovered and in the open. Front end loaders will also be used to move the hog fuel from the pile onto the hog fuel walking floor bin. Traffic-generated dust from front end loaders was accounted for in the review of air quality impacts. The hog fuel walking floor will transport hog fuel to the furnace fuel feed conveyor that empties to the furnace fuel metering bin.

4.5 Wet Hammer Mills

The proposed facility includes two wet hammer mills operating in parallel. They are referred to as "wet hammer mills" because they process materials upstream of the dryer. The purpose of the wet hammer mills is to reduce the size of the chips so the material can be more easily dried and milled into pellets. The wet hammer mills will be enclosed and airborne dust emissions will be captured by a pneumatic system and routed to dedicated cyclo-filters for particulate

emissions control. The cyclo-filters serving the wet hammer mills will be capable of controlling particulate emissions down to 0.0044 grains per standard cubic foot of air (gr/scf).

4.6 Drying Line

The drying line includes the biomass furnace, drum dryer, and emissions control system. The furnace will combust hog fuel to provide heat for the dryer and will have a maximum heat input capacity of 164.81 million British thermal units per hour (MMBtu/hr), which is roughly 25.57 short tons per hour of hog fuel as received. Hog fuel will consist of ground forest slash from logging and forest management operations and hog fuel from local mill operations.

Wet raw materials will be staged in a metering bin before being fed to the drum dryer inlet. Hot flue gas from the furnace will be routed through the drum dryer to dry, by direct contact, the raw material from approximately 45 percent moisture to a target 10 percent final moisture. Dried material will then be conveyed pneumatically from the drum dryer discharge through a pair of high-efficiency cyclones operating in parallel that will separate the dried wood material from the moisture-rich exhaust gas stream. The dried material will then be conveyed pneumatically to a dry-product intermediate-storage silo.

The emissions control system for the drying line will consist of dual cyclones followed by a Wet Electrostatic Precipitator (WESP), and finally a Regenerative Thermal Oxidizer (RTO). The purpose of the dual cyclones is simply to separate the dried material stream from the wet exhaust. The WESP is a high efficiency particulate removal device and expected to remove upwards of 98% of the particulate matter (PM) from the exhaust gas stream. The RTO is a secondary combustion unit used to destroy organic gases through oxidation.

4.7 Furnace

The proposed biomass furnace is designed with four primary combustion zones to enable combustion of high moisture content fuel. Zone 1 is designed to dry out the fuel, with combustion occurring in the following zones. PNWRE claims this design accommodates the moisture in the biomass fuel, making a fuel pile cover unnecessary. The combustion chamber will have four zones of overlapping, moving grates. The primary combustion air enters the fuel bed from the under-fire air zone through slots between the grate bars. The combustion chamber is refractory lined. The chamber is designed with the top as a secondary combustion chamber. The furnace will also have a second, secondary combustion chamber to enable final combustion of remaining combustible gases from the Furnace.

The furnace will exhaust to the drum dryer and is designed to provide process heat at 752 F. After passing through the drum dryer, exhaust gases will pass through the pollution control system consisting of dual cyclones, a wet Electrostatic Precipitator (ESP), and finally, a Regenerative Thermal Oxidizer (RTO). Therefore, during normal operations, emissions from the furnace will ultimately exhaust through the RTO stack.

Ash will drop through the grates to four separate ash hoppers in the primary combustion chamber and a single ash hopper in the secondary combustion chamber. Ash hoppers will drop to a “submerged” ash conveyor that provides an air lock from the furnace. The ash conveyor drag chain will move ash to an enclosed ash storage bin.

4.8 Dryer Line Operating Scenarios

4.8.1 Normal, Steady-State Operation

During normal steady-state operation at design capacity of the facility, the drying line will exhaust through the WESP and RTO, and the pellet lines will exhaust through baghouses or cyclo-filters and the Regenerative Catalytic Oxidizer (RCO). Operating the drying line at design capacity (164.81 MMBtu/hr) will require roughly 23.2 metric tons per hour (mt/h) of hog fuel as received and produce dried material for roughly 51.1 mt/hr of pellet product.

The dryer system will have two emergency bypass stacks: One for the furnace and a separate stack for the dryer. When used, exhaust and emissions from these stacks bypass the air pollution control system (WESP + RTO) and are emitted directly to the atmosphere at approximately 50 feet above grade. The purpose of the bypass stacks is to provide for safe operation and temperature control during start-ups, shutdowns and unplanned malfunction and emergency events. Temperature control enables more gradual heating and cooling of the furnace refractory during these events, which is essential for assuring the integrity and long life of the refractory as well as other furnace and dryer components. Also, ability to control temperature provides a means to maintain refractory heat during minor malfunction events, thereby avoiding the need for a cold start.

4.8.2 Planned Startups

Planned startups are referred to as “cold startups” because they are initiated when the dryer system (furnace + drum dryer) has been shut down and has cooled to a temperature that requires gradual heating to safely bring the system up to operating temperatures. This is necessary to avoid thermally shocking and damaging the dryer system. The furnace bypass stack is open when combustion in the furnace is initiated, thereby bypassing both the drum dryer and the air pollution control system. PNWRE stated in an email correspondence to ORCAA that exhaust bypassing the air pollution control system during a cold startup will last only approximately 30 minutes during a normal cold startup, and that they anticipate no more than ten cold startups per year. Based on these constraints, and a reduced initial heat rate to the furnace of approximately 15% of the maximum furnace heat input rate (~ 25 MMBtu/hr), emissions rates were determined by PNWRE to be less than those during normal, steady state operations. ORCAA staff evaluated PNWRE’s emissions calculations and concurs with this assessment. However, to assure startup emissions do not exceed these bounds in the future, ORCAA imposed startup constraints consistent with the cold startup descriptions provided by PNWRE.

ORCAA’s understanding is that cold startup of the furnace will be initiated using approximately 25 pounds of dry wood, which will be augmented with approximately 15 gallons of diesel. The diesel is used as an accelerant. The clean/dry wood is placed on a bed of dry wood chips on the furnace grate, and is ignited using the diesel to help accelerate the combustion. The fire is manually ignited and allowed to burn while exhausting from the emergency bypass stack. During this time, the flue gas connection to the dryer is closed and the dryer ID fan runs at minimum speed with the drum turning and empty without material. After approximately 30 minutes, normal biomass fuel input to the furnace is initiated, the emergency stack of the

furnace is closed, and the flue gas connection to the dryer is opened. By this time, the dryer system's air pollution controls (WESP and RTO) will be fully operational. Therefore, uncontrolled emissions through the bypass stack are only expected to last for 30 minutes during a normal cold startup. However, optimal combustion of the fuel is not achieved until the primary and secondary air in the furnace are fully functioning. Once a temperature of approximately 300° C (570° F) is reached, primary and secondary combustion air fans start operation at a low rate and then are gradually increased. From this point in the cold startup sequence, temperatures within the combustion chamber are increased in steps of approximately 120° F per hour until the normal fuel input rate is reached. The air ratio between primary and secondary combustion air are then adjusted until the working/operating temperature is achieved. PNWRE expects approximately 14 hours from cold start-up to achieving normal operating temperatures. However, bypass of the air pollution control system is only expected to last 30 minutes during the entire 14-hour cold startup period.

PNWRE does not expect the total duration of cold startup bypass (Exhaust bypassing the air pollution control systems during cold startups) to exceed 5 hours per year (10 startups @ 30 minutes per). Use of diesel during startups is expected to be less than 15 gallons per startup, and no more than 150 gallons per year. A propane torch may also be used to ignite the biomass during startups. Air emissions rates from combustion of wood and diesel during startups were quantified by PNWRE's Environmental consultant and found to be less than emissions rates during normal, steady state operations. Emissions from the bypass stack during a cold startup are likely to exhibit opacity and, therefore, BACT opacity limits imposed on the dryer system exempt emissions from the bypass stacks during cold startups. However, ORCAA's general opacity standard of 20% (ORCAA Rule 8.2) applies at all times including startup and shutdown as does the State's general opacity standard of 20% (WAC 173-400-040).

4.8.3 Planned Shutdowns

Planned shutdown from full production mode to a cold system takes about 14 hours. PNWRE stated in an email correspondence that air pollution control systems will be fully operational during a planned shutdown. Shutdowns are initiated by stopping fuel flow to the furnace fuel hopper. Actual fuel feed to the furnace stops after fuel hopper is emptied. Simultaneously with stopping fuel feed to the furnace, material input to the dryer system is ramped down until material infeed is completely stopped. It takes less than 30 minutes to empty the entire drum of material. The dryer system temperature will be controlled by a substitute cooling load (water injection into the drum). Until the fuel on the furnace grate is completely combusted, the furnace and dryer will exhaust through the air pollution control system consisting of the WESP and RTO. Only after fuel is completely combusted on the grate, primary and secondary combustion fans will be stopped and the flue gas connection to the dryer closed. As the combustion chamber cools down, hot gases will be exhausted through the emergency bypass stack of the furnace.

Cool down of the furnace is conducted at a rate of approx. 120° F per hour. Simultaneously, the dryer system ID fan will continue to run until the dryer system is cooled down. At this stage of the shutdown sequence, because neither fuel is being combusted nor material is being dried, hot gases from both the furnace and dryer will be emitted through the emergency bypass stacks for these units until they are sufficiently cooled. Therefore, during a planned shut-down,

air pollution control systems for the drying system will be fully operational for the duration of time air pollution is being generated. Likewise, the RCO will be fully operational while air emissions are being generated by the hammer mills and pellet coolers during a planned shutdown. ORCAA's understanding is that PNWRE anticipates only two shutdowns of the furnace each year but assumed 10 for the air impacts analysis.

4.8.4 Malfunctions and Emergencies

The furnace automatically aborts to the furnace bypass stack in the event of a malfunction or emergency situation like loss of power or failure of a critical piece of equipment. Likewise, the dryer system automatically aborts to the dryer bypass stack due to similar events. Aborts and exhausting through either or both of the bypass stacks may be triggered by failsafe interlocks associated with the furnace, dryer, emissions control systems, or utility supply systems. Typically interlocks divert flue gas to both bypass stacks in the event of loss of utilities (electricity, water, compressed air or fuel), when monitoring conditions exceed safe operating ranges (temperature, pressure, flowrate) or in the event of a spark detection within the wood drying system and flue gas treatment areas. Whenever there is an abort, the furnace automatically switches to idle mode and emissions are exhausted through the bypass stack. Simultaneously, fuel feed to the furnace is reduced to the idle mode heat rate. During malfunctions and emergencies, air emissions from the drying system may emit uncontrolled through the bypass stacks. However, other than during planned startups and shutdowns of the drying system, exhaust through either of the bypass stacks is presumed to be in excess of the pollutant mass rate limits established in the air permit.

4.8.5 Feedstock Interruptions

Idle-mode may also be triggered by a reduction or interruption of feedstock material to the dryer. During these occurrences, idle-mode is triggered as a means to reduce the heat rate to the dryer in order to avoid excessive dryer temperatures and damage to the drying system. Also, in addition to preventing damage to the drying system, idle-mode avoids completely shutting down the furnace when feedstock input to the dryer is interrupted. Idle mode is initiated by reducing or stopping fuel feed into the furnace. The dryer system temperatures are reduced by substitute load (assumed water injection). Until feedstock input is resumed, the system continues to operate at a reduced heat rate. PNWRE stated in a communication with ORCAA that the furnace, dryer, dry hammer mills and pellet coolers will all be exhausted through their respective air pollution control systems when there are feedstock interruptions.

4.9 Pellet Mill

Dried material is then transferred by conveyor to into a dry-product intermediate-storage silo. The purpose of the intermediate-storage silo is to allow the dried material moisture content to homogenize; This helps provide a consistent raw material moisture content for the pelletizing process. The residency time of the dried materials in the intermediate-storage silo is approximately 2 hours and 50 minutes. The intermediate storage silo is passively vented through fabric filters.

A chain conveyor will be used to transfer dried material from the bottom of the intermediate-storage silo to four dry hammer mills operating in parallel. The dry hammer mills then mill the dried material into the desired size and consistency for pelletizing. Each dry hammer mill will

exhaust through a cyclo-filter for recovering product and controlling particulate emissions. Exhaust streams from each dry hammer mill cyclo-filter will then be combined with exhaust streams from the pelletizing line and passed through a RCO for destruction of Volatile Organic Compounds (VOC) before emitting to the atmosphere. The RCO functions like an RTO to destroy VOC; however, the RCO uses a catalyst material rather than a ceramic material to achieve oxidation, and therefore can achieve efficient VOC destruction at lower temperatures.

Dried, milled material from the dry hammer mills and associated cyclo-filters will empty onto a chain conveyor which then conveys the milled product to a dry product intermediate-storage silo. The purpose of the dry intermediate-storage silo is to provide additional retention time for achieving homogenous moisture content, which is a key factor for achieving the desired quality in the final product. The intermediate-storage silo will be passively vented through a particulate filter.

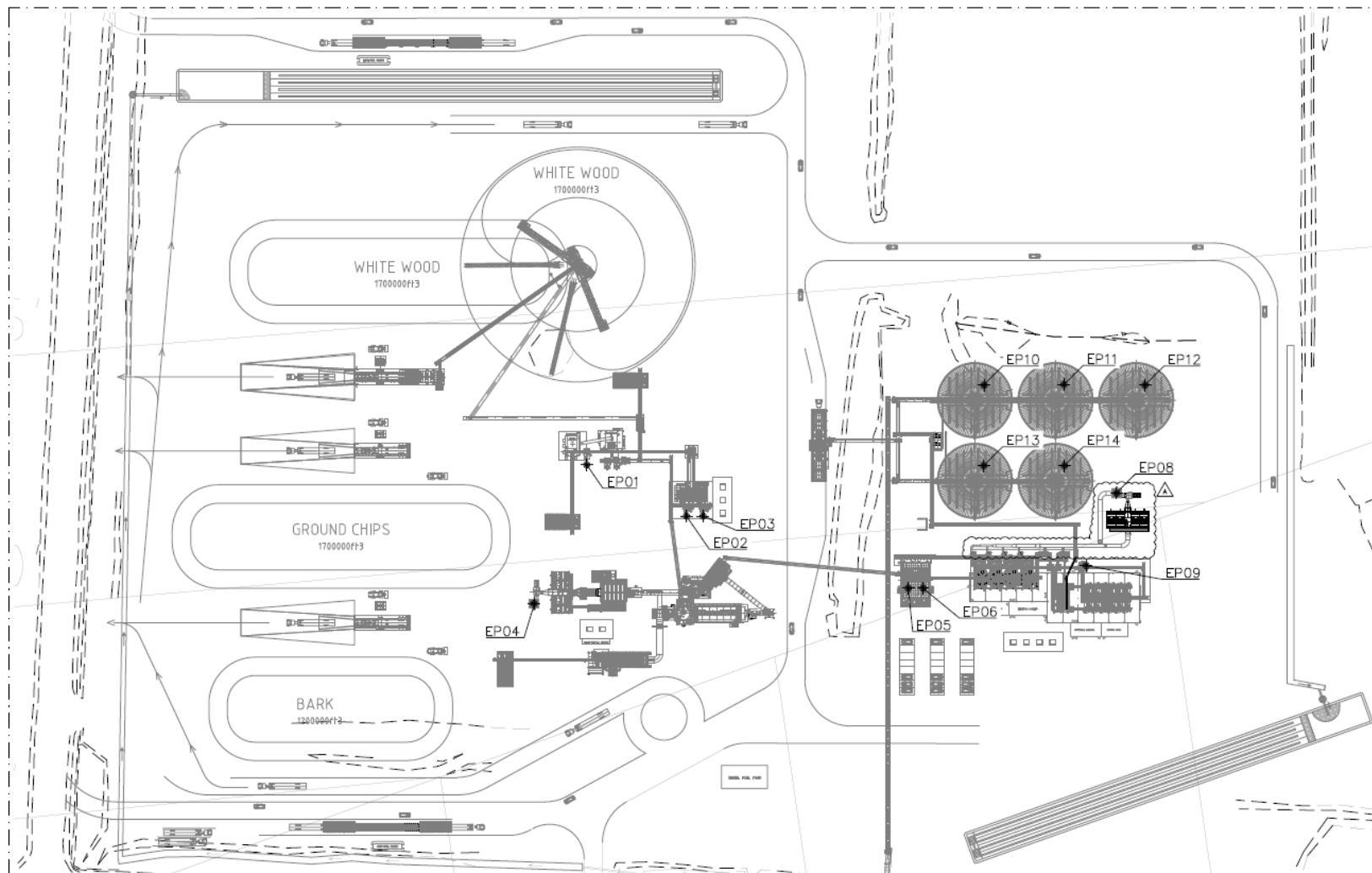
A chain conveyor will then transport the dried, milled material from the outlet of the intermediate-storage silo to the pellet mill hoppers, which independently feed the pellet mills. PNWRE proposes two pellet lines consisting of six pellet mills each, for a total of 12 pellet mills. In each pellet mill, rollers push the material through the holes of a die plate. Knives on the exterior of the die plate cut the wood pellets from the plate once the pellets achieve the required length. The temperature of a freshly produced pellet is around 200 degrees Fahrenheit (°F). Therefore, the two pellet lines will discharge into pellet coolers where the material will flow countercurrent to a stream of ambient air. The airflow reduces the temperature of the wood pellets at the point of pellet discharge. Each pellet cooler will be equipped with either a baghouse or cyclo-filter to remove dust from the exhaust stream before it goes to the RCO. The exhaust streams from the two pellet cooler baghouses will then be combined with the exhaust streams from the dry hammer mills and passed through the RCO for control of VOC before being emitted to the atmosphere.

4.10 Pellet Silos and Loadout

Cooled pellets will be conveyed from the pellet coolers to one of five pellet silos. The total combined capacity of the pellet silos is approximately 60,000 short tons. The silos will utilize aeration fans and venting to maintain low pellet temperature for final shipment. An automated enclosed conveyor will draw pellets from the silos evenly according to loading schedules and transport them via enclosed conveyor to the neighboring Willis Enterprises' existing conveyors and marine vessel loadout facilities. Willis Enterprises operates under an RC2-class ORCAA registration (source number 2112, file number 647). The existing conveyors and vessel loadout facilities owned by Willis Enterprises are under a separate air permit and already registered with ORCAA.

PNWRE will also have the ability to deliver pellets via a truck unloading system; however, this system would be used only in special circumstances. PNWRE proposes no more than 10 loaded trucks per day and 32,000 tons per year of truck loadout utilization.

Figure 2: General Facility Layout



* Figure from page 3 of PNWRE NOC application

5. Air Pollutant Emissions

Air pollutant emissions evaluated through this permitting action included Criteria Air Pollutants, Hazardous Air Pollutants (HAP), Toxic Air Pollutants (TAP) and Greenhouse Gases (GHG). Criteria Air Pollutants are air pollutants that have established National Ambient Air Quality Standards (NAAQS). EPA established and periodically reevaluates and updates NAAQS for six of the most common air pollutants— carbon monoxide, lead, ground-level ozone, particulate matter, nitrogen dioxide, and sulfur dioxide— these are known as “criteria” air pollutants (or simply “criteria pollutants”). Based on ambient monitoring throughout the nation, areas are ranked in terms of whether or not the NAAQS are maintained. It is important to note that ground-level ozone is not an air pollutant directly emitted, but is created via photo-chemical reactions in the atmosphere involving volatile organic compounds (VOCs) and nitrogen oxides (NOx). Therefore, ozone is not included in any of the tables below because it is not directly emitted. However, ground-level ozone precursors (NOx and VOC) are quantified and included in the tables below.

HAP are those pollutants that are known or suspected by the EPA to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects. There are 188 air pollutants that are regulated as HAP under the Clean Air Act. Facilities that have the potential to emit 10 tons or more per year of any single HAP or 25 tons per year or more of any combination of HAPs are regulated as “Major Sources” of HAP and subject to the Title V Air Operating Permit program. It is important to note that HAPs emitted as solids are a subset of and reflected in the PM, PM10 and PM2.5 emissions rates shown in the tables below. Likewise, HAP emitted as volatile gases are reflected in the VOC emissions rates shown below.

TAP, also known “air toxics,” are specific air pollutants regulated by Washington because they are known or suspected by the Department of Ecology to cause cancer or other serious health effects. Washington State regulates TAP through a State-wide regulation titled CONTROLS FOR NEW SOURCES OF TOXIC AIR POLLUTANTS, which is under Chapter 173-460 of the Washington Administrative Code (Washington Air Toxics Regulation). It is important to note that the list of TAP regulated by Washington contains more than 350 chemical compounds and substances. Most but not all of the federally listed HAPs are also listed and regulated as TAPs in Washington. However, there are 40 HAPs that are not listed as TAP. Emissions of individual TAPs were provided in PNWRE’s application. Section 12 addresses compliance with the Washington Air Toxics Regulation.

A comprehensive Potential to Emit analysis for the proposed facility was provided in PNWRE’s NOC application. The emissions inventory accounts for both point sources of emissions (stacks and equipment) and area sources of emissions (material piles, material handling, haul roads). All foreseeable operating scenarios were accounted for such as startup, shutdown, and “idle mode,” as well as normal, steady-state operation. Emissions estimates for normal operations were calculated based on fuel and production rates at maximum capacity for each operating scenario and assuming no down time.

5.1 Emissions During Normal Operations

ORCAA staff reviewed PNWRE's emissions calculations including verifying emissions factors, conversions, assumptions and equations used to calculate emissions from individual point and area sources. ORCAA staff concluded that PNWRE's emission estimates reflect maximum potential to emit of the facility and are appropriate for making regulatory determinations and estimating ambient air quality impacts. Therefore, the emissions rates and facility-wide emissions provided in PNWRE's NOC application were used in confirming applicability of relevant air regulations, evaluating projected air impacts, and establishing emissions limits.

Table 2 provides a Potential to Emit (PTE) summary for the proposed facility in terms of tons of pollutants emitted annually. PTE represents the highest amount an air pollutant could be emitted at the maximum design rates of each emissions source and assuming continuous operation. PTE estimates were used in determining applicability of relevant performance standards and air regulatory programs such as the Title V Air Operating Permits (Title V) and Prevention of Significant Determination (PSD) permitting programs. To ensure long term protection of air quality, PTE estimates were converted to annual emissions limits and included in the proposed conditions of approval detailed in section 16.

Table 3 provides a summary of emissions rates for criteria pollutant emissions and Greenhouse Gases (GHG) in terms of pounds per hour for each source. It is important to note that Hazardous Air Pollutants (HAP) and Toxic Air Pollutants (TAP) emissions rates are shown for normal, steady-state operations, and for potential alternative operating scenarios. Emission rates for normal, steady-state operations reflect the maximum hourly PTE with air emissions control systems fully functioning. To ensure that the performance of air pollution control systems do not degrade over time, emission rates for normal operations were converted to commensurate emission limits as appropriate, and included in the recommended conditions of approval detailed in section 16.

5.2 Startup Emissions Rates

Startup of the drying system will require exhausting emissions uncontrolled from the furnace bypass stack. PNWRE stated in their application that two cold start-ups are anticipated per year. However, the air quality analysis provided in the application conservatively assumes 10, 30-minute startups per year. The objective for startups is to gradually bring the furnace up to normal operating temperatures using clean startup fuels.

PNWRE stated in their application that startup of the furnace will be initiated using approximately 25 pounds of dry wood, which will be augmented with approximately 15 gallons of diesel and ignited using propane torches. The diesel is used as an accelerant. The clean/dry wood is placed on a bed of dry wood chips on the furnace grate, soaked with diesel and ignited using propane to help accelerate the combustion. The fire is manually ignited using propane torches and allowed to burn while exhausting from the emergency bypass stack. During this time, the flue gas connection to the dryer is closed and the dryer ID fan runs at minimum rpm with the drum turning and empty without material.

Table 2. Facility-Wide Potential Annual Emissions (tons per year (tpy))

Pollutant	Class	Point-Sources (tpy)	Area-Sources (tpy)	Facility-Wide Total (tpy)	Title V Major?	PSD Major?
PM	Criteria ^a	108	32	140	N/A	No
PM ₁₀	Criteria ^a	88	10	98	No	No
PM _{2.5}	Criteria ^a	71	1	72	No	No
NO _x	Criteria ^a	230	Not emitted	230	Yes	No
CO	Criteria ^a	185	Not emitted	185	Yes	No
VOC ^d	Criteria ^a	67	Not emitted	67	No	No
SO ₂	Criteria ^a	18	Not emitted	18	No	No
Lead	Criteria ^a	< 0.1 lbs/yr	Not emitted	< 0.1 lbs/yr	No	No
CO ₂ e	GHG ^e	163,592	Not emitted	163,592	N/A	No
Total HAP	Total HAP ^b	1.32	Not emitted	1.32	No	N/A
Formaldehyde (Highest individual HAP/TAP)	HAP ^b TAP ^c	0.31	Not emitted	0.31	No	N/A

Table Notes:

^a EPA has established national ambient air quality standards (NAAQS) for six of the most common air pollutants—carbon monoxide, lead, ground-level ozone, particulate matter, nitrogen dioxide, and sulfur dioxide—known as “criteria” air pollutants (or simply “criteria pollutants”).

^b HAP means Hazardous Air Pollutant. Hazardous Air Pollutants are those known to cause cancer and other serious health impacts and are regulated under the federal Clean Air Act. HAPs that are solids when emitted are reflected in the PM, PM₁₀ and PM_{2.5} annual emissions. HAP emitted as volatile organic compounds are reflected in the VOC annual emissions.

^c TAP means any toxic air pollutant regulated in Washington and listed in WAC 173-460-150.

^d VOC is regulated as a Criteria Air Pollutant because it is a precursor to Ground Level Ozone (O₃)

^e GHG means Green House Gas. GHG are shown in terms of Carbon Dioxide Equivalents.

^f Table acronyms: CO = carbon monoxide; CO₂e = carbon dioxide equivalent; HAP = hazardous air pollutant; N/A = not applicable; NO_x = nitrogen oxides; PM = particulate matter; PM_{2.5} = particulate matter 2.5 microns or less in diameter; PM₁₀ = particulate matter 10 microns or less in diameter; PSD = Prevention of Significant Deterioration; PTE = potential to emit; SO₂ = sulfur dioxide; TPY = tons per year; VOC = volatile organic compound

Table 3. PTE Hourly Emissions Rates, Normal Operation (pounds per hour (lb/hr))

Sources	PM	PM ₁₀	PM _{2.5}	NO _x	CO	VOC	SO ₂	CO _{2e}
Truck Dumpers (fugitive ^a): TD-01 (White Wood) TD-02 (Chips) TD-03 (Bark)	0.26	0.12	0.02					
Storage Piles (fugitive ^a): SP-01 (White Wood) SP-02 (Chips) SP-03 (Bark)	0.44	0.22	0.11					
Vehicle Dust (fugitive ^a): VEH-01 (Truck Traffic) VEH-02 (Loaders)	9.24	2.75	0.28					
Chip Cleaning Line (point ^b): EP-01 (Cyclo-filter)	6.81	1.70	0.29					
Wet Hammer Mills (point ^b): EP-01 (Cyclo-filter 1) EP-02 (Cyclo-filter 2)	3.83	0.96	0.16					
Drying Line (point ^b): EP-03	7.73	7.73	7.73	52.00	42.00	6.58	4.12	36,729
Dry Product Intermediate Storage (point ^b): EP-05 (Silo 1 Vent) EP-06 (Silo 2 Vent)	0.03	0.03	0.03					
Pellet Mill (point ^b): EP-07 (RCO ^c)	2.12	1.90	1.90	0.41	0.18	8.61	0.00	529
Milled, Dry Product Intermediate Storage (point ^b): EP-08 (Silo Vent)	0.02	0.02	0.02					
Pellet Storage Silos (point ^b): EP-09 (Silo 1 Vent) EP-09 (Silo 2 Vent) EP-09 (Silo 3 Vent) EP-09 (Silo 4 Vent) EP-09 (Silo 5 Vent)	4.39	2.68	1.01					
Truck Loadout (fugitive ^a): LO-01 (Truck Loading)	0.01	0.00	0.00					
Emergency Generator (point ^b): GEN-01 (Generator Stack)	0.17	0.17	0.17	2.05	2.87	1.26	1.03	575

Table Notes:

^a Fugitive, refers to fugitive sources of emissions and means air pollution emitted to that is not captured and is not emitted through a stack or vent. Examples of fugitive emissions include, but are not limited to, road dust from vehicle traffic, wind-blown dust from piles of materials, and volatiles that escape capture or containment systems like emission from leaks.

^b Point, refers to point sources of emissions and means air pollution that is captured and emitted to the ambient air through a stack or vent.

^c Table acronyms: TD = Truck Dumpers; SP = Storage Piles; VEH = Vehicle Traffic; EP = Emission Point; LO = Load Out; RCO =Regenerative Catalytic Oxidizer

^dPollutant acronyms: CO = carbon monoxide; CO_{2e} = carbon dioxide equivalent; NO_x = nitrogen oxides; PM = particulate matter; PM_{2.5} = particulate matter 2.5 microns or less in diameter; PM₁₀ = particulate matter 10 microns or less in diameter; VOC = volatile organic compound;

After approximately 30 minutes, normal biomass fuel input to the furnace is initiated, the emergency stack of the furnace is closed, and the flue gas connection to the dryer is opened. By this time, the dryer system air pollution controls (WESP and RTO) will be fully operational. Therefore, uncontrolled emissions through the bypass stack are only expected to last for 30 minutes during a normal cold startup. Startup continues from this point forward in the startup sequence with air pollution controls functional. However, optimal combustion of the fuel is not achieved until the primary and secondary air are fully functioning.

Once a temperature of approx. 300° C (570° F) is reached, primary and secondary combustion air fans start operation at a low rate and then are gradually increased. From this point in the cold startup sequence, temperatures within the combustion chamber are increased in steps of approximately 120° F per hour until the normal fuel input rate is reached. The air ratio between primary and secondary combustion air are then adjusted until the working/operating temperature is achieved. From cold start-up to operating temperature, PNWRE expects a cold startup to take about 14 hours.

Startup emission rate estimates are shown in Table 4 and were based on emissions factors from EPA's latest edition of Compilation of Air Pollutant Emissions Factors (AP-42). Startup emission rates from wood combustion were based on EPA AP-42 Chapter 1.10 Residential Wood Stoves utilizing emission factors for conventional stoves. Conventional stoves are enclosed wood-burning heaters that operate without catalytic combustors and have no emission reduction technology or design features. This scenario is similar to the piles of burning wood pieces within the enclosed furnace. Startup emission rates from diesel fuel used as an accelerant were based on EPA AP-42 Chapter 1.3 using emission factors for distillate oil-fired boilers and assuming ultra-low sulfur diesel.

Table 4. Uncontrolled Startup Emissions Rates (pounds per hour (lb/hr))

Sources	PM	PM ₁₀	PM _{2.5}	NO _x	CO	VOC	SO ₂	CO _{2e}
Drying Line (Furnace & Dryer) ^a EP-03	0.84	0.84	0.84	0.67	5.92	1.34	0.03	784

Table Notes:

^a Includes uncontrolled emissions from combustion of dry wood and diesel for the initial 30-minutes during a cold startup.

5.3 Shutdown Emission Rates

Shut down from full production mode to a cold system takes about 14 hours. PNWRE stated in their application that air pollution control systems will be fully operational during a planned shutdown while fuel is still being combusted on the furnace grates. Shutdowns are initiated by stopping fuel flow to the furnace fuel hopper. Actual fuel feed to the furnace stops after fuel hopper is emptied. Simultaneously with stopping fuel feed to the furnace, material input to the dryer system is ramped down until material infeed is completely stopped. It takes less than 30 minutes to empty the entire drum of material. The dryer system temperature will be controlled by a substitute cooling load (water injection into the drum). Until the fuel on the furnace grate is completely combusted, the furnace and dryer will exhaust through the air pollution control system consisting of the cyclones, WESP and RTO. Only after fuel is completely combusted on

the grate, primary and secondary combustion fans will be stopped and the flue gas connection to the dryer closed. As the combustion chamber cools down, hot gases will be exhausted through the emergency bypass stack of the furnace.

Cool down of the furnace is conducted at a rate of approx. 120° F per hour. Simultaneously, the dryer system ID fan will continue to run until the dryer system is cooled down. At this stage of the shutdown sequence, because neither fuel is being combusted nor material is being dried, hot gases from both the furnace and dryer will be emitted through the emergency bypass stacks for these units until they are sufficiently cooled. Therefore, during a planned shut-down, air pollution control systems will be fully operational for the duration of time air pollution is being generated. Likewise, the RCO will be fully operational while air emissions are being generated by the hammer mills and pellet coolers during a planned shutdown.

6. Administrative Requirements for NOC Applications

NOC applications are subject to filing fees according to ORCAA Rule 3.3(b) and may incur additional NOC processing fees at an hourly rate according to ORCAA Rule 3.3(c). Applicable NOC filing fees for PNRE's NOC application were paid prior to ORCAA commencing processing of the application. Additional NOC processing fees may apply and will be determined and assessed prior to issuing a Final Determination and the Approval Order (a.k.a.: Air Permit).

NOC applications are subject to a 15-day public notice and an opportunity to request a 30-day public comment period. Public notice of PNRE's NOC application was posted on ORCAA's website on July 25, 2023. The time period for filing comments on the application and requests for a public comment period expired on August 9, 2023.

There were no requests for a public comment hearing during the application noticing period. However, the NOC application is subject to a mandatory public comment period per ORCAA Rule 6.1.3(b) as the proposed facility would cause a significant net increase in emissions of several air contaminants. Per ORCAA regulations, a public hearing may be scheduled if requested during the public comment period. However, anticipating a high level of public interest on the case, PNWRE proactively requested ORCAA to schedule a Public Hearing. Therefore, ORCAA will schedule and issue public notice for a public hearing after a preliminary determination has been made.

7. SEPA Review

The State Environmental Policy Act (SEPA) under Chapter 197-11 WAC is intended to provide information to agencies, applicants, and the public to encourage the development of environmentally sound proposals. The goal of SEPA is to assure that significant impacts are mitigated.

The City of Hoquiam served as the Lead Agency for this project and issued a Determination of Non-Significance (DNS) on July 25, 2023. The DNS lists an Air Permit issued by ORCAA as one of the permits required. Other permits listed in the DNS include:

- Department of Ecology – National Pollutant Discharge Elimination System Construction Stormwater Permit and Industrial Stormwater Permit
- FAA – Clearance Letter

- City of Hoquiam Building Permit
- City of Hoquiam Critical Areas Review
- Port of Grays Harbor – Approval of Operation Agreement and Lease Agreement

8. Criteria for Approval

ORCAA's Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6, establish the following general criteria for approving new stationary sources and modifications to existing stationary sources of air pollution in ORCAA's region:

1. **Performance Standards** - Any new stationary source or modification will likely comply with applicable air-performance standards such as the federal new source performance standards (NSPS), national emission standards for hazardous air pollutants (NESHAPs), and any performance standards adopted under chapter 70A.15 RCW;
2. **BACT** - The new or modified stationary source is controlled to a level that meets the standard of "Best Available Control Technology" (BACT);
3. **Ambient Air Quality** – Any increase in air emissions will not cause or contribute to violation of any ambient air quality standard;
4. **Federal Air Permitting Requirements** – All applicable federal air permits, if required, are secured;
5. **Washington Air Toxics Regulations** - If there are increases in toxic air pollutant (TAP) emissions, the requirements of Washington's Controls for New Sources of Toxic Air Pollutants under Chapter 173-460 WAC are met; and,
6. **Public Outreach** – Public notice and comment requirements in ORCAA's regulations and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6 are met.

The following sections provide more detail on each criterion.

9. Applicable Performance Standards (Summary)

ORCAA's Rule 6.1.4(a)(1) and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6, require a finding that any new or modified stationary source will likely comply with applicable state, federal and local performance standards for air emissions including emission standards adopted under chapter 70A.15 RCW, emissions standard of ORCAA, and federal emission standards including New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), and National Emission Standards for Hazardous Air Pollutants for Source Categories (MACT standards). The performance standards in Table 5 were determined applicable to the new wood pellet manufacturing facility. The performance standards in Table 6 were determined relevant to the proposed wood pellet manufacturing facility, but inapplicable. A comprehensive list of applicable performance standards that apply to all stationary sources of air pollution to be located at the facility, as well as general air regulations and standards that apply, are included in the Appendix.

Table 5: General Requirements, Prohibitions, and Performance Standards

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	discussion/determination
Air Operating Permit Program Chapter 173-401 WAC; ORCAA Rule 5.1	All sources subject to this regulation must have a permit to operate that assures compliance by the source with all applicable requirements. While chapter 173-401 WAC does not impose substantive new requirements, it does require that fees be imposed on sources and that certain procedural measures be adopted especially with respect to compliance.	The facility is projected to emit greater than 100 tons per year of NO _x and CO, which makes the facility a “major source” and subject to the Title V Air Operating Permit program.
Operating Permit Fees ORCAA Rule 3.2	Requires all facilities subject to the Air Operating Program to pay an annual fee to cover ORCAA’s costs of administering the program.	The facility is projected to emit greater than 100 tons per year of NO _x and CO, which makes the facility a “major source” and subject to the Title V Air Operating Permit program.
Interference or Obstruction ORCAA Rule 7.1	Prohibits willfully interfering with or obstructing the Executive Director or any Agency employee in performing any lawful duty.	Applies generally to all air pollution sources
False or Misleading Statements ORCAA Rule 7.2	Prohibits any person from willfully making a false or misleading statement to the Board or its representative as to any matter within the jurisdiction of the Board.	Applies generally to all air pollution sources
Unlawful Reproduction or Alteration of Documents ORCAA Rule 7.3	Prohibits reproducing or altering, or causing to be reproduced or altered, any order, registration certificate or other paper issued by the Agency if the purpose of such reproduction or alteration is to evade or violate any provision of these Regulations or any other law.	Applies generally to all air pollution sources
Display of Orders and Certificates ORCAA Rule 7.4	Any order or registration certificate required to be obtained by these Regulations shall be available on the premises designated on the order or certificate. In the event that the Agency requires order or registration certificate to be displayed, it shall be posted. No person shall mutilate, obstruct, or remove any order or registration certificate unless authorized to do so by the Board or the Executive Director.	Applies generally to all air pollution sources
RACT Requirement WAC 173-400-040(1)(c) ORCAA Rule 8.3	All emissions units are required to use reasonably available control technology (RACT).	Applies generally to all air pollution sources
Visible Emissions WAC 173-400-040(2) ORCAA Rule 8.2(a)	Prohibits emissions with opacity of greater than 20% for more than three (3) minutes in any one hour.	Applies generally to all air pollution sources
Sulfur Dioxide WAC 173-400-040(7)	No person shall cause or allow the emission from any emissions unit in excess of one thousand ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based	Applies generally to all air pollution sources

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	discussion/determination
	on the average of any period of sixty consecutive minutes.	
Control Equipment Maintenance and Repair ORCAA Rule 8.8	ORCAA Rule 8.8 requires that all air contaminant sources keep any process and/or air pollution control equipment in good operating condition and repair.	Applies generally to all air pollution sources
Fallout WAC 173-400-040(3) ORCAA Rule 8.3(e)	Prohibits particulate emissions from any source to be deposited, beyond the property under direct control of the owner or operator of the source, in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material was deposited.	Applies generally to all air pollution sources
Fugitive Emissions WAC 173-400-040(4)(a) ORCAA Rule 8.3(c)	The owner or operator of any emissions unit engaging in materials handling, construction, demolition, or other operation which is a source of fugitive emission shall take reasonable precautions to prevent the release of air contaminants from the operation.	Applies generally to all air pollution sources
Odor WAC 173-400-040(5) ORCAA Rule 8.5	ORCAA Rule 8.5 contains general requirements for controlling odors and a general prohibition of odors that unreasonably interfere with the use or enjoyment of a person's property.	Applies generally to all air pollution sources
Emissions Detrimental to Persons or Property WAC 173-400-040(6) ORCAA Rule 7.6	Prohibits causing or allowing the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business.	Applies generally to all air pollution sources
Concealment and Masking WAC 173-400-040(8) ORCAA Rule 7.5	Prohibits installation or use of any device or means to conceal or mask emissions of an air contaminant, which causes detriment to health, safety, or welfare of any person, or causes damage to property or business.	Applies generally to all air pollution sources
Fugitive Dust WAC 173-400-040(9)	The owner or operator of a source or activity that generates fugitive dust must take reasonable precautions to prevent that fugitive dust from becoming airborne and must maintain and operate the source to minimize emissions.	Applies generally to all air pollution sources
Excess Emissions Provisions WAC 173-400-107; WAC 173-400-108 ORCAA 8.7	Requires excess emissions be reported to the Agency as soon as possible and within 24 hours and establishes criteria qualifying excess emissions as unavoidable.	Applies generally to all air pollution sources
Record Keeping and Reporting. ORCAA Rule 8.11	Requires the following: 1. Maintenance of records on the nature and amounts of emissions and other related information as deemed necessary by ORCAA; 2. Reporting of emissions to ORCAA upon request.	Applies generally to all air pollution sources
Emission Standards for Combustion and Incineration units	Prohibits emissions from any combustion unit in excess of 0.1 grain/dscf. EPA test methods from 40 CFR Part 60 Appendix A shall be used should demonstration of compliance be required.	The furnace, RTO and RCO are combustion units and subject to the limit of these rules.

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	discussion/determination
WAC 173-400-050(1) ORCAA Rule 8.3(a)	Measured concentrations for combustion and incineration units shall be adjusted for volumes corrected to seven percent oxygen, except when the permitting authority determines that an alternate oxygen correction factor is more representative of normal operations.	
Emission standards for general process units. WAC 173-400-060 ORCAA Rule 8.3(a)	Prohibits emissions from any process unit in excess of 0.1 grain/dscf. EPA test methods from 40 CFR Appendix A shall be used should demonstration of compliance be required.	The performance standards of these rules apply to all baghouses, cyclo-filters and other general process units proposed for the facility.
Washington State Reporting of Emissions of Greenhouse Gases Chapter 173-441 WAC	This rule establishes mandatory greenhouse gas (GHG) reporting requirements for owners and operators of certain facilities that directly emit GHG as well as for certain suppliers and electric power entities. For suppliers, the GHGs reported are the quantity that would be emitted from the complete combustion or oxidation of the products supplied.	Based on PNWRE's GHG potential to emit estimates and a strong likelihood that the facility will operate continuously, actual emissions will likely exceed the 10,000 metric tons CO ₂ e or more per calendar year threshold. Therefore, reporting GHG per Chapter 173-441 WAC will likely be required.
Standards of Performance for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60 Subpart IIII	This New Source Performance Standard (NSPS) applies to manufacturers, owners, and operations of certain stationary compression-ignition (CI) internal combustion engines (ICEs).	PNWRE is proposing to operate a CI ICE emergency generator. Therefore, NSPS IIII is applicable to the CI ICE at the facility. PNWRE proposes to operate the CI ICE as an emergency engine as defined in this regulation and comply with the applicable performance standards.
National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines 40 CFR Part 63, Subpart ZZZZ	Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions.	The proposed facility will include one diesel-fired emergency generator that meets the applicability criteria of this regulation.

Table 6: Inapplicable Requirements, Prohibitions, and Performance Standards

Regulation Title Citation	Applicability Criteria	Basis
Registration ORCAA Regulation 4	Requires facilities that are minor sources of emissions to register annually with ORCAA and pay annual registration fees.	PNWRE will be a major source of air pollution and subject to the Title V Air Operating Permit (AOP) program
Annual Registration Fees ORCAA Rule 3.1	Requires payment of annual registration fees to ORCAA based in part on air pollutants emitted during the previous year.	PNWRE will be a major source of air pollution and subject to the Title V Air Operating Permit (AOP) program
Initial Notification ORCAA Rule 4.3(a)&(b); 4.3(f)	Requires facilities subject to registration to register by submitting an initial notification with the information in ORCAA Rule 4.3(b) within 30 days from: 1) Commencement of operation of any new or recommissioned stationary source; 2) Change in ownership of existing registered stationary source. The notification must be signed by the owner or operator or by the agent appointed by the owner.	PNWRE will be a major source of air pollution and subject to the Title V Air Operating Permit (AOP) program
Administrative Change Notification ORCAA Rule 4.3(e); 4.3(f)	Requires facilities to notify ORCAA of any changes to administrative information within 30 days from the change taking place including, but not limited to, contact names, address, phone numbers, and permanent shut down or decommissioning of a stationary source. The notification must be signed by the owner or operator or by the agent appointed by the owner.	PNWRE will be a major source of air pollution and subject to the Title V Air Operating Permit (AOP) program
Annual and/or Periodic Reports ORCAA Rule 4.3(c)&(d); 4.3(f)	Requires stationary sources to submit reports with information directly related to the registration program when requested by the Agency within 30 days of receipt of the request. The submittal must be signed by the owner or operator or by the agent appointed by the owner.	PNWRE will be a major source of air pollution and subject to the Title V Air Operating Permit (AOP) program
Emission Standards for Combustion and Incineration units – Incinerators WAC 173-400-050(2)	For any incinerator, no person shall cause or allow emissions in excess of one hundred ppm of total carbonyls as measured by Source Test Method 14 procedures in Source Test Manual - Procedures for Compliance Testing, state of Washington, department of ecology, as of September 20, 2004, on file at ecology. "Incinerator" means a furnace used primarily for the thermal destruction of waste.	The biomass combusted in the furnace is a fuel and not regulated as a waste. Therefore, this rule does not apply.
Commercial and industrial solid waste incineration units WAC 173-400-050(4)	This rule applies to commercial and industrial solid waste incineration units constructed on or before November 30, 1999. A commercial and industrial solid waste incineration unit that commenced construction on or before November 30, 1999, that meets the applicability requirements in 40 C.F.R. 62.14510, must comply with the requirements in 40 C.F.R. Part 62, Subpart GGG (in effect on the date in WAC 173-400-025).	PNWRE's biomass furnace is not regulated as an incinerator because the biomass fuel is not classified as a solid waste. Therefore, this rule does not apply.

Other waste wood burners WAC 173-400-070(5)	This rule applies to waste wood burners and incorporates by reference federal standards for Commercial and Industrial Solid Waste Incineration units (CISWI) under 40 CFR Part 60 Subpart CCCC and 40 CFR Part 62 Subpart III. For purposes of this rule, "Waste wood" means, "... wood pieces or particles generated as a by-product or waste from the manufacturing of wood products..."	This rule does not apply because the biomass combusted in the proposed furnace does is not "waste wood," but will be purchased and combusted as a fuel to produce heat for a manufacturing process.
Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units 40 CFR 60 Subpart Db	The affected facility to which this subpart applies is each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr).	Although the heat rate of the furnace exceeds 100 MMBtu/hr, by definition, the furnace is not a steam generating unit. Therefore, the performance standards under this subpart do not apply.
Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units 40 CFR Part 60 Subpart Dc	The affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/h)) or less, but greater than or equal to 2.9 MW (10 MMBtu/h).	The heat rate of the furnace exceeds 100 MMBtu/hr and is, therefore, outside the applicability slot of this performance standard. Also, by definition, the furnace is not a steam generating unit. Therefore, the performance standards under this subpart do not apply.
Standards of Performance for Commercial and Industrial Solid Waste Incineration Units 40 CFR Part 60 Subpart CCCC	This subpart establishes new source performance standards for commercial and industrial solid waste incineration units (CISWIs) and air curtain incinerators (ACIs). Commercial and industrial solid waste incineration unit (CISWI) means any distinct operating unit of any commercial or industrial facility that combusts, or has combusted in the preceding 6 months, any solid waste as that term is defined in 40 CFR part 241.	Per §241.2, traditional fuels that have not been discarded are not solid wastes, including cellulosic biomass (virgin wood). The traditional fuels definition further states that clean cellulosic biomass, defined in §241.2 to include forest-derived biomass such as bark and hogged fuel, is a fuel product. Therefore, the proposed fuel for the furnace is not solid waste and the furnace is not a CISWI.
National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products 40 CFR Part 63 Subpart DDDD	This subpart establishes national compliance options, operating requirements, and work practice requirements for hazardous air pollutants (HAP) emitted from plywood and composite wood products (PCWP) manufacturing facilities. Plywood and composite wood products (PCWP) manufacturing facility means a facility that manufactures plywood and/or composite wood products by bonding wood material (fibers, particles, strands, veneers, etc.) or agricultural fiber, generally with resin under heat and pressure, to form a panel, engineered wood product, or other product defined in § 63.2292.	The PNWRE facility will be an area source of HAP emissions. Therefore, 40 CFR Part 63 Subpart DDDD does not apply.

National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR Part 63 Subpart DDDDD	This subpart establishes national emission limitations and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP.	The PNWRE facility will be an area source of HAP emissions. Therefore, the proposed facility is not subject to 40 CFR Part 63 Subpart DDDDD.
National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources 40 CFR Part 63, Subpart JJJJJ	This subpart applies to industrial, commercial, or institutional boilers that are located at, or part of, an area source of hazardous air pollutants (HAP). A “boiler” is defined as an enclosed device using controlled flame combustion in which water is heated to recover thermal energy in the form of steam and/or hot water.	The PNWRE facility will be an “Area Source” of HAP emissions. However, the facility does not include any boilers. Therefore, the performance standards under 40 CFR Part 63 Subpart JJJJJ do not apply.
National Emission Standards for Hazardous Air Pollutants for Wood Preserving Area Sources 40 CFR Part 63 Subpart QQQQQ	This subpart applies to wood preserving operations that are Area Sources of HAP emissions. Wood preserving is defined as means the pressure or thermal impregnation of chemicals into wood to provide effective long-term resistance to attack by fungi, bacteria, insects, and marine borers.	The PNWRE facility will not use any wood preservatives in the production of wood pellets. Therefore, the standards in Subpart QQQQQ do not apply.
Federal- MANDATORY GREENHOUSE GAS REPORTING 40 CFR Part 98	This part establishes mandatory greenhouse gas (GHG) reporting requirements for owners and operators of certain facilities that directly emit GHG as well as for certain suppliers.	PNWRE will not emit GHG above the threshold requiring federal reporting. This determination relies on “netting out” biogenic CO ₂ e emissions from combustion of biomass.

10. Best Available Control Technology (BACT)

ORCAA Rule 6.1.4(a)(2) and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6, require the finding that a new source or modification to an existing source of air pollution in an attainment or unclassifiable area will employ best available control technology for all pollutants (BACT) not previously emitted or whose emissions would increase as a result of the new source or modification.

New sources of air pollution and modifications to existing sources of air pollution are required to use BACT to control all pollutants not previously emitted, or those for which emissions would increase as a result of the new source or modification. BACT is defined in WAC 173-400-030 as, *“an emission limitation based on the maximum degree of reduction for each air pollutant subject to regulation under chapter 70A.15 RCW emitted from or which results from any new or modified stationary source, which the permitting authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes and available methods, systems, and techniques, including fuel cleaning, clean fuels, or treatment or innovative fuel combustion techniques for control of each pollutant.”*

PNWRE's original NOC application and subsequent application addendums describe air pollution control technology proposed for all point, area, and fugitive sources of air emissions, and the expected level of control. The emissions levels and control efficiencies proposed meet ORCAA's presumed BACT control levels. These BACT levels may be assured through commensurate emissions limits established in the air permit issued by ORCAA, which is staff's recommendation. Air pollution control technologies and measures proposed and corresponding controlled emissions levels are described in the following table.

Table 7: BACT Summary

Emission Source ID	Emission Source	Air Pollution Control Technology & Methods	BACT Emissions Level
TD-01	Truck Dumper – White Wood	Dust Control Plan: <ul style="list-style-type: none"> 10 miles per hour (mph) speed limit for all mobile vehicles Applying water where needed Using a vacuum truck as needed 	General Opacity Standards
TD-02	Truck Dumper – Chips		
TD-03	Truck Dumper – Hog Fuel		
SP-01	Storage Pile – White Wood		
SP-02	Storage Pile – Chips		
SP-03	Storage Pile – Hog Fuel		
VEH-01	Vehicle Traffic – Trucks		
VEH-02	Vehicle Traffic – Front End Loaders		
EP-01.1	Chip Cleaning Line	Cyclo-filter	0.0044 gr/scf 0% opacity
EP-01.2	White Wood Disc Screening	Clean/wet feedstock	General Opacity Standards
EP-01.3	Hog Fuel Feed	Clean/wet feedstock	General Opacity Standards
EP-02	Wet Hammer Mill 1	Cyclo-filter	0.0044 gr/scf 0% opacity
EP-03	Wet Hammer Mill 2	Cyclo-filter	0.0044 gr/scf 0% opacity
EP-04	Drying Line (furnace, drum dryer)	Cyclones (2 units in parallel) WESP RTO	PM ₁₀ : 8.0 lbs/hr (filterable + condensable) NOx: 53 lbs/hr CO: 42 lbs/hr VOC: 7 lbs/hr HCl: 0.028 lbs/hr Hg: 0.0006 lbs/hr 5% opacity
EP-05	Dry Product Intermediate Storage 1	Silo Filters	0% opacity 98+ % filter efficiency
EP-06	Dry Product Intermediate Storage 2		
EP-07	Dry Hammer Mills (HM, 4 units)	Baghouse or Cyclo-filter (for each dry HM) Baghouse or Cyclo-filter (per each pellet cooler) RCO (serving exhaust from all)	PM ₁₀ : 2.0 lbs/hr (filterable + condensable) VOC: 8.6 lbs/hr 5% opacity
EP-08	Pelletizers (12 units) Pellet Coolers (2 units)		
EP-09	Milled Dry Product Intermediate Storage	Silo Filter	0% opacity 98+ % filter efficiency
EP-10	Pellet Storage Silo #1	Silo Filters	0% opacity 98+ % filter efficiency
EP-11	Pellet Storage Silo #2		
EP-12	Pellet Storage Silo #3		
EP-13	Pellet Storage Silo #4		
EP-14	Pellet Storage Silo #5		
EP-15	Truck Loadout	Silo Filter and shrouded dump	5% opacity 98+ % filter efficiency

11. Ambient Impact Analysis (Criteria Pollutants)

ORCAA's Rule 6.1.4(a)(3) and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6, require emissions from any new stationary source or modification not delay the attainment date of an area not in attainment, nor cause or contribute to a violation of any National Ambient Air Quality Standard (NAAQS).

PNWRE provided an Ambient Air Quality Analysis (AAQA) in their NOC application, which compares estimated maximum ground-level concentrations of regulated pollutants to the NAAQS for each regulated pollutant. PNWRE's NOC application includes a comprehensive description of the air dispersion modeling analysis performed. PNWRE relied on the AERMOD air dispersion model (Version 22112) to estimate ground-level concentrations. Ambient impacts were estimated based continuous operation and maximum Potential to Emit (PTE) for all pollutants evaluated. ORCAA staff reviewed PNWRE's AAQA, the emissions and other model input parameters, modeling methods, meteorological data, and background ambient air quality data used. Staff concluded that PNWRE's AAQA conservatively estimates ground-level impacts, and that results from the analysis are appropriate for comparing with the NAAQS. Results from PNWRE's analysis shown in the table below sufficiently demonstrates that emissions from the new facility will not cause or contribute to a violation of any Ambient Air Quality Standard (AAQS), which meets this approval criteria.

Table 8: Impacts Compared to NAAQS

Pollutant	Averaging Period	Modeled	Background	Total Impact	NAAQS	Exceeds NAAQS? (Yes/No)
PM ₁₀ (µg/m ³)	24-hour	79.8	42.1	122	150	No
PM _{2.5} (µg/m ³)	24-hour	11.6	12.5	24.1	35	No
	Annual	3.86	5.1	8.96	12	No
NO ₂ (ppb)	1-hour	68.6	15.1	83.7	100	No
	Annual	0.818	2.6	3.42	53	No
CO (ppm)	1-hour	0.381	1.04	1.42	35	No
	8-hour	0.0809	0.69	0.771	9	No
SO ₂	Not modeled – Emissions less than significant emissions rates					
Lead	Not modeled – Emissions less than significant emissions rates					

12. Ambient Impact Analysis (Toxic Air Pollutants)

Washington's regulation titled Controls for New Sources of Toxic Air Pollutants (Air Toxics Rule) under Chapter 173-460 of the Washington Administrative Code applies to new stationary sources of Toxic Air Pollutants (TAP), including modifications to existing emissions units that increase TAP. The purpose of the Air Toxics Rule is to, "... maintain such levels of air quality as will protect human health and safety." The TAPs covered under the Air Toxics Rule include carcinogens and non-carcinogens

The Air Toxics Rule has two independent requirements for new sources and modifications that increase TAP emissions above de-minimis levels:

- 1) **tBACT:** The new or modified emission units must use Best Available Control Technology to control TAP emissions (WAC 173-460-040(3)(a)).

- 2) **Ambient Impact:** The NOC application must demonstrate that any increase in TAP from the new or modified emission units are sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects (WAC 173-460-070).

12.1 tBACT

The tBACT requirement applies to any new or modified emission units that triggers the Air Toxics Rule (results in a TAP increase above de-minimis levels), regardless of facility-wide or “net” TAP emissions. The term tBACT means Best Available Control Technology, as that term is defined in WAC 173-400-030, but applied to control of TAP (see BACT definition in Section 10).

Staff’s conclusion is that the BACT emissions levels described above for particulate and VOC emissions meets the tBACT requirement for TAP emitted as particulate and TAP emitted as VOC, respectively. These tBACT levels may be assured through the VOC and PM₁₀ emissions limits established in the air permit issued by ORCAA, which is staff’s recommendation.

12.2 Ambient Impact Review

The Air Toxics Rule provides a multi-tiered, screening approach under WAC 173-460-080 to assess health impacts and demonstrate compliance with the ambient impact requirement under WAC 173-460-070, which is that TAP increases must be sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects.

The “First Tier Review” (Tier 1 Review) is a two-step process. First, the emissions increase of each TAP is compared to its unique Small Quantity Emission Rate (SQER). SQERs are listed for each TAP under WAC 173-460-150. An SQER is the level of emissions of a TAP below which dispersion modeling is not required to demonstrate compliance with the ambient impact requirement. TAP emissions increases used in this first step must be based on the maximum potential to emit considering control or reduction in emissions achievable using the air pollution control technology or methods proposed to meet the tBACT requirement. Any TAP with an increase below its SQER can be presumed to be in compliance with the ambient impact requirement. If this is the outcome, further analysis is not required for that TAP. However, TAPs with emissions increases above their SQER must undergo the second step of the Tier 1 Review.

The second step of the Tier 1 Review requires evaluating TAP impacts against Acceptable Source Impact Levels (ASIL) and is referred to as an ASIL Analysis. An ASIL is the adopted health-based concentration for a TAP below which can be presumed as meeting the ambient impact requirement of WAC 173-460-070. ASILs are provided for each TAP under WAC 173-460-150. An ASIL analysis typically involves using an ambient air dispersion model to estimate ambient concentrations resulting from TAP emissions increases and considering air dispersion and local meteorological characteristics of the source. If the modeled impact of the increase in emissions of a TAP does not exceed its corresponding ASIL, the ambient impact requirement of WAC 173-460-070 may be considered met and the First Tier Review is completed for that TAP.

Emissions rates used to support an ASIL Analysis must be based on the maximum potential to emit considering control or reduction in emissions achievable using the air pollution control technology or methods proposed to meet the tBACT requirement. In addition, the Air Toxics Rule allows TAP reductions from existing emission units not subject to review to be subtracted

or “netted out” from TAP increases, provided the reductions are included in the approval order as enforceable voluntary emission limits and meet all the requirements of WAC 173-460-071.

These requirements include:

- (1) The voluntary emissions reductions must be enforceable through a regulatory order issued by the air permitting agency.
- (2) The approval order enforcing the voluntary emissions reductions must include monitoring, recordkeeping, and reporting requirements sufficient to ensure the reductions are maintained.
- (3) The agency’s preliminary determination to approve the voluntary emissions reductions are subject to a 30-day public notice and comment period and opportunity for a public hearing.

For pollutants with ambient concentrations found to be greater than their ASIL, a “Second Tier Review” (Tier 2 Review) by the Washington Department of Ecology (Ecology) is required. An application for a Tier 2 Review by Ecology is referred to a Tier 2 petition. Tier 2 petitions must include a Health Impacts Assessment (HRA) and estimated ambient TAP impacts based on refined air dispersion modeling. Ecology will not act on a Tier 2 petition unless a written preliminary determination on the NOC application for the new or modified TAP source and a draft approval order have been completed by the local agency with jurisdiction. Ecology’s review and approval of a Tier 2 petition is contingent on a finding that TAP impacts meet the ambient impact requirement of WAC 173-460-070 that increases in TAP emissions are sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects. If Ecology recommends denial of a Tier 2 petition, the permitting authority may not approve the project. The applicant then has the option of submitting a petition for a “Third Tier Review” (Tier 3 Review) by Ecology and a request for a risk management decision.

PNWRE conducted a Tier 1 Review of TAP according to the methods prescribed in Washington’s Air Toxics Rule. The Tier 1 review was based continuous operation and maximum PTE for all TAP emitted. PTE for most of the TAP expected to be emitted are below their respective SQER level and, therefore, do not require modeling for demonstrating compliance with the ambient impact requirement. Several TAP were found to be emitted above their respective SQER level. For these TAP, PNWRE applied the same modeling methodology as described above to estimate ground level impacts. Staff reviewed this analysis including PTE emission rate estimates, model input parameters, modeling methods, and meteorological data. Staff concluded that PNWRE’s ASIL analysis conservatively estimates ground-level TAP impacts, and that results from the analysis are appropriate for comparing with ASILs for each TAP evaluated. Results demonstrate that TAP emissions from the new facility will be sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects, which meets this approval criteria.

Table 9: ASIL Analysis

TAP Name	Averaging Period	ASIL ($\mu\text{g}/\text{m}^3$)	Projected Impact ($\mu\text{g}/\text{m}^3$)	Pass Tier 1 (Yes/No)
12-Dimethylbenz(a)anthracene	year	8.50E-06	1.42E-08	Yes
Acetaldehyde	year	3.70E-01	8.58E-03	Yes
Acrolein	24-hr	3.50E-01	4.09E-02	Yes
Benzene	year	1.30E-01	1.03E-02	Yes
Formaldehyde	year	1.70E-01	1.33E-02	Yes
Arsenic	year	3.00E-04	6.21E-06	Yes
Beryllium	year	4.20E-04	3.12E-07	Yes
Cadmium	year	2.40E-04	1.89E-06	Yes
Chromium hexavalent	year	4.00E-06	9.68E-07	Yes
Manganese	24-hr	3.00E-01	1.14E-02	Yes
Mercury	24-hr	3.00E-02	5.03E-04	Yes
Nickel	year	3.80E-03	1.05E-05	Yes

13. Requirements for Major Stationary Sources and Major Modifications to Major Stationary Sources

Projects that are major stationary sources and major modifications to major stationary sources as defined in 40 CFR 52.21(b) may be subject to permitting requirements under WAC 173-400-700 through 173-400-860.

Based on the facility's PTE, the pellet manufacturing facility proposed by PNWRE is not a "Major Stationary Source" as defined in 40 CFR 52.21(b) and not subject to the permitting program required by WAC 173-400-700 through WAC 173-400-860. Therefore, these permitting requirements do not apply. This conclusion will be assured through annual limits.

14. Title V Air Operating Permit (AOP) Implications

The State of Washington program pursuant to Title V of the federal Clean Air Act is governed under Chapter 173-401 WAC, the Washington Air Operating Permit Program. Chapter 173-401 WAC requires existing major stationary sources to operate in compliance with an approved Air Operating Permit (AOP). Major stationary sources are those stationary sources with a potential to emit which is greater than 100 tons per year of any criteria pollutant, greater than 10 tons per year of any hazardous air pollutants (HAP), or greater than 25 tons per year of any combination of HAP.

Based on the facility's PTE, the pellet manufacturing facility proposed by PNWRE is a "Major Stationary Source" as defined in Chapter 173-401 WAC. Specifically, the facility will be a major source of both NO_x and CO. Therefore, the facility will be subject to Title V of the federal Clean Air Act and will be required to submit a Title V Air Operating Permit (AOP) application within twelve months after commencing operation.

15. Environmental Justice Considerations

EPA defines Environmental Justice (EJ) as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. The

purpose of an EJ review in conjunction with an air permitting action is to ensure no group of people bear a disproportionate share of the negative environmental consequences as the result of the permitting action. Further, ORCAA strives to engage the affected community effectively and meaningfully regarding the permitting action, and to ensure compliance with obligations pursuant to Title VI of the Civil Rights Act.

With respect to factoring EJ into air permitting decisions, EPA Region 10 expects air agencies to:

- Identify overburdened communities;
- Engage with communities;
- Evaluate cumulative impacts; and,
- Use available authority to minimize emissions.

However, EPA Region 10 does not expect air agencies to use the Clean Air Act's authorities to address existing disproportional impacts to communities when implementing New Source Review in areas that are "attainment/unclassifiable" with respect to meeting the NAAQS.

The following subsections describe how these expectations from EPA Region 10 were met.

15.1 Identify Overburdened Communities

The initial step in an EJ review is to identify any affected populations or communities of concern and to identify whether they are disproportionately impacted.

ORCAA used EPA's environmental justice screening and mapping tool, EJScreen, to answer this first part of this question. An EJScreen Community Report was generated for Grays Harbor County. The Community Report estimates a minority population of 31%, with approximately 8% of the total population speaking Spanish and 1% speaking another non-English language at home. All demographic indicators were below the 80th percentile for the nation. Likewise, the Community Report indicates that Grays Harbor County is below the 80th percentile for all environmental indicators. Environmental indicators above the 80th percentile is an indication that a community is already disproportionately impacted. Therefore, ORCAA staff's conclusion is that the project impact area does not include any preexisting, overburdened communities. A copy of the Community Report with more detailed information will be filed as part of the supporting documentation for the project.

Pre-existing air quality impacts were evaluated based on ambient air quality monitoring data and designation of the area with respect to maintaining compliance with the NAAQS. If air quality in a geographic area meets or is cleaner than a national standard based on ambient air monitoring data, it is called an attainment area and designated "attainment/unclassifiable." Areas may also be presumed "attainment/unclassifiable" based on population density and air pollutant emissions being below certain thresholds. For this case, the project impact area and Grays Harbor County as a whole is designated "attainment/unclassifiable." Therefore, there are no preexisting nonattainment issues identified within the County. Furthermore, the ambient air quality analysis provided in PNWRE's application demonstrates that air emissions will not cause or contribute to any exceedance of a NAAQS. Therefore, ORCAA staff's conclusion is that there are no indications of any existing disproportional impacts to communities of concern within the project impact area.

15.2 Engage with Communities

A public hearing will be conducted on ORCAA's Preliminary Determination to approve PNWRE's application to construct the new pellet mill. ORCAA's current public noticing and outreach policies and procedures are sufficient to effectively provide notice for the public hearing and meaningfully engage with the community surrounding the proposed project site and include:

- Issuing a press release of the Public Notice.
- Posting the Public Notice, application, and ORCAA's Preliminary Determination on ORCAA's web site.
- Post Hard Copies – Post hard copies of the Public Notice and ORCAA's Preliminary Determination at a local location near the project site. For this case, copies will be posted at the nearest library, Hoquiam Timberland Library located at 420, 7th St. in Hoquiam.
- Emailing the Public Notice to environmental agencies, local tribal nations, organizations and advocacy groups, and persons and entities who have expressed interest in the case.

After the public hearing and considering all comments submitted on the case, ORCAA will prepare a written Responsiveness Summary. The Responsiveness summary will include a description of ORCAA's Final Determination as well as responses to questions and comments received during the comment period and public hearing. ORCAA's Responsiveness Summary will be forwarded to all persons and entities who submitted comments during the comment period and public hearing.

15.3 Evaluate Cumulative Impacts

The air permitting action for this case did not trigger a cumulative impacts analysis under either the Clean Air Act or the Washington Clean Air Act. However, with respect to air impacts alone, results from the Ambient Air Quality Analysis included in PNWRE's application do reflect background ambient concentrations for each criteria air pollutant evaluated. Also, the modeling protocol specified that air emissions from existing and planned facilities within the project impact area should be included in the analysis. However, because of the proposed location of new pellet mill, it was determined by PNWRE's environmental consultant that impacts of emissions from existing sources of air pollution are already reflected in the background concentrations used. Therefore, emissions from nearby sources of air pollution were not explicitly modeled. PNWRE's environmental consultant also determined that planned sources in the Grays Harbor area are not likely to cause significant impacts within the project impact area. Therefore, the air analysis can be considered a cumulative analysis with respect to the NAAQS.

15.4 Use Available Authority to Minimize Emissions

As described elsewhere in this report, ORCAA applied existing New Source Review authorities provided under the Clean Air Act and the Washington Clean Air Act to minimize emissions from the proposed new pellet mill. Principally among these authorities is the requirement to use BACT for controlling emissions. The BACT requirement was applied and corresponding BACT emissions limits are included in the air permit.

16. Recommended Conditions of Approval

The following conditions of approval were determined necessary for assuring compliance with applicable air regulations and standards and protecting air quality. Recommended conditions of approval will become effective once the Approval Order is issued:

1. **Approved Equipment.** The new wood pellet manufacturing facility as described in Notice of Construction application No. 23NOC1606, application addendums, and the associated Final Determination is approved for construction and operation subject to conditions in this Order of Approval.
[Regulatory Basis: ORCAA Rule 6.1(a); ORCAA Rule 6.1.2(l); 40 CFR Part 52.2470(c), Table 6]
2. **Preapproval Required.** Prior approval by ORCAA may be required for the following as specified in ORCAA Rule 6.1:
 - a) Construction, installation, or establishment of any stationary source;
 - b) Modification to any existing stationary source;
 - c) Replacement or substantial alteration of emission control technology installed on an existing stationary source; or,
 - d) Deviations from the approved plans, drawings, data, and specifications of the stationary sources listed in the following table:

Source ID	Approved Stationary Sources	Approved Control Technologies and Measures
TD-01	Truck Dumper – White Wood (75' Back-On Truck Dump Platform)	Dust control plan
TD-02	Truck Dumper – Chips (75' Back-On Truck Dump Platform)	Dust control plan
TD-03	Truck Dumper – Hog Fuel (75' Back-On Truck Dump Platform)	Dust control plan
SP-01	Storage Pile – White Wood	Dust control plan
SP-02	Storage Pile – Chips	Dust control plan
SP-03	Storage Pile – Hog Fuel	Dust control plan
VEH-01	Vehicle Traffic – Trucks	Dust control plan
VEH-02	Vehicle Traffic – Front End Loaders	Dust control plan
EP-01.1	Chip Cleaning Line	Cyclo-filter
EP-01.2	White Wood Disc Screening	None
EP-01.3	Hog Fuel Feed	None
EP-02	Wet Hammer Mill 1	Cyclo-filter
EP-03	Wet Hammer Mill 2	Cyclo-filter
EP-04	Drying Line Emissions Units (EU): EU 04.1 – Furnace: <ul style="list-style-type: none"> Fuel – Biomass Start-up Fuel – Biomass + Diesel 4 reciprocating grate zones Heat rate 165 MMBtu/hr total Under-fire and overfire air + secondary combustion zone EU 04.2 - Drum dryer: <ul style="list-style-type: none"> Ø 20' by 90' long Feedstock input - 85.5 ton/h @ 45% mc) Operating temperature around 750°F Operating airflow around 124,031 ACFM 	Cyclones (2 units in parallel) Wet Electrostatic Precipitator: <ul style="list-style-type: none"> Output Rating: 70 kilovolt, 1500 milliamp. Input: 105 KVA, 460 V / 3-phase / 60 Hz. 3 Fields and 621 Ø10" tubes Regenerative Thermal Oxidizer: <ul style="list-style-type: none"> 4 chambers 20.2 MMBtu/hr gas consumption
EP-05	Dry Product Intermediate Storage Silo 1:	Silo vent filters

Source ID	Approved Stationary Sources	Approved Control Technologies and Measures
	<ul style="list-style-type: none"> Volume (gross) 45,732 ft³ 	
EP-06	Dry Product Intermediate Storage Silo 2: <ul style="list-style-type: none"> Volume (gross) 45,732 ft³ 	Silo vent filters
EP-07	Dry Hammer Mills (DHM, 4 units): <ul style="list-style-type: none"> 15.5 ton/h design capacity each 900 HP each 	Baghouses or Cyclo-filters (4 units, one for each dry HM): <ul style="list-style-type: none"> Each exhausting to RCO
EP-08	Pellet Mill Emissions Units (EU) EU 08.1 - Pelletizers (12 units): <ul style="list-style-type: none"> 500 HP each 5.5 ton/h EU 08.2 - Pellet Coolers (2 units)	Baghouses or Cyclo-filters (2 units, one per each pellet cooler): <ul style="list-style-type: none"> Each exhausting to RCO Regenerative Catalytic Oxidizer (RCO): <ul style="list-style-type: none"> Controls exhaust from DHMs, Pelletizers, and Pellet Coolers Design Airflow = 29,500 ACFM from DHM + 76,000 ACFM from pelleting line 5.8 MMBtu/hr design natural gas consumption
EP-09	Milled Dry Product Intermediate Storage Silo <ul style="list-style-type: none"> Volume (gross) 45,732 ft³ 	Silo vent filters
EP-10	Pellet Storage Silo #1	Silo vent filters
EP-11	Pellet Storage Silo #2	
EP-12	Pellet Storage Silo #3	
EP-13	Pellet Storage Silo #4	
EP-14	Pellet Storage Silo #5	
EP-15	Truck Loadout	Silo Filter and shrouded dump chute

[Regulatory Basis: ORCAA Rule 6.1(a); ORCAA Rule 6.1.2(l); WAC 173-400-110(2); WAC 173-400-111(10)]

3. **Cyclo-filters and Baghouses.** In addition to applicable general emissions limits and standards, the following limits and standards apply to all cyclo-filters and baghouses emitting directly to the ambient air:
 - a) Cyclo-filters and baghouses must be operating whenever the pellet plant is operating.
 - b) All cyclo-filters and baghouses must be equipped with a working manometer to read pressure drop across the filters.
 - c) Visible emissions must not exceed 0% opacity as measured in accordance with EPA 40 CFR Part 60 Appendix A Method 9.
 - d) Total filterable emissions must not exceed 0.004 grains per standard cubic feet, 1-hour average, measured in accordance with EPA Method 5 in Appendix A to 40 CFR Part 60, or an alternative method approved by ORCAA.
 - e) Baghouses and Cyclo-filters must exhaust through a vertical stack that provides suitable conditions for stack testing per Method 5.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2); WAC 173-460-040(3)]

4. **Silo Vents.** In addition to applicable general emissions limits and standards, the following limits and standards apply to all silo vents:
 - a) Silo vents must be equipped with suitable filters capable of at least 98% filtration efficiency for the size range of particles emitted.
 - b) Filter efficiency must be confirmed and documented by appropriate certification and/or guarantees provided by the filter manufacturer.

- c) Visible emissions from any silo vent must not exceed 0% opacity as measured in accordance with EPA 40 CFR Part 60 Appendix A Method 9.
[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2); WAC 173-460-040(3)]

5. **Drying Line.** In addition to applicable general emissions limits and standards, the following limits and standards apply to emissions from the drying line (furnace and drum dryer):

- a) Emissions from the RTO stack must not exceed the following limits:

Pollutant	Limit	Reference Test Methods
PM ₁₀ (filterable + condensable)	12.7 lbs/hr, 1-hr ave	EPA Methods 1-4, 5, 201, or 201A, plus EPA Reference Method 202 from 40 CFR Part 60 Appendix A-1, or equivalent methods agreed to in advance by ORCAA. Use of EPA Reference Method 5 assumes all filterable particulate is PM ₁₀ .
NO _x	53 lbs/hr, 1-hr ave	EPA Methods 1-4, and 20 from 40 CFR Part 60 Appendix A, or an equivalent method agreed to in advance by ORCAA.
CO	42 lbs/hr, 1-hr ave	EPA Methods 1-4, and 10 from 40 CFR Part 60 Appendix, or an equivalent method agreed to in advance by ORCAA.
VOC (Per EPA's Wood Products Protocol 1)	8.92 lbs/hr, 1-hr ave	EPA Method 1-4, and 25A from 40 CFR Part 60 Appendix A, or equivalent method agreed to in advance by ORCAA. Concurrent testing for both methanol and formaldehyde. VOC must be determined using EPA Method OTM-26 (see condition 8). Formaldehyde and methanol testing methods (or equivalent methods agreed to in advance by ORCAA): <ul style="list-style-type: none"> • Methanol: EPA Method 308 or 320 from 40 CFR Part 63 Appendix A or NCASI method CI/WP-98.01 • Formaldehyde: EPA Method 316 or 320 from 40 CFR Part 63 Appendix A or NCASI Method CI/WP-98.01
HCl	0.028 lbs/hr, 1-hr ave	EPA Methods 1-4, and 26 or 26A (M26 or M26A) from 40 CFR part 60, appendix A-8.
Hg	0.0006 lbs/hr, 1-hr ave	EPA Methods 1-4, and 29, 30A, or 30B from 40 CFR Part 60, appendix A-8. For Method 29, collect a minimum of 4 dscm per run; for Method 30A or Method 30B, collect a minimum sample as specified in the method; for ASTM D6784 collect a minimum of 4 dscm.
Opacity	5%, 6-minute average	EPA Method 9 from 40 CFR Part 60 Appendix A.

- b) At all times, except during startup as allowed by condition 9, emissions from the furnace and dryer must exhaust through the air pollution control system consisting of the pair of cyclones, Wet Electrostatic Precipitator (WESP) and Regenerative Thermal Oxidizer (RTO).
- c) The WESP must be equipped with a means to continuously monitor and record VDC and mADC of each WESP field.
- d) The cake produced by the WESP decanter centrifuge must be properly disposed of and must not be recycled back into the furnace fuel feed system or in the pellet feedstock.
- e) All combustion chambers of the RTO must be equipped with thermocouples to continuously measure and record combustion chamber temperature.
- f) Except as provided by conditions 9 and 10, emissions exhausting through either the furnace or dryer bypass stacks are presumed to be in violation of the limits and standards of this condition.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2); WAC 173-460-040(3)]

6. **Pellet Mill.** In addition to applicable general emissions limits and standards, the following limits and standards apply to emissions from the dry hammer mills, pelletizers and pellet coolers:

- a) At all times, exhaust from the dry hammer mills must exhaust through their respective baghouses and the Regenerative Catalytic Oxidizer (RCO).
- b) At all times, emissions from the pellet coolers must exhaust through their respective baghouses and the RCO.
- c) All baghouses must be equipped with a working manometer to read pressure drop across the filters.
- d) All combustion chambers of the RCO must be equipped with thermocouples to continuously measure and record combustion chamber temperature directly after the catalyst bed.
- e) Emissions from the RCO stack must not exceed the following limits:

Pollutant	Limit	Reference Test Methods
PM ₁₀ (filterable + condensable)	2.0 lbs/hr, 1-hr ave	EPA Methods 1-4, 5, 201, or 201A, plus EPA Reference Method 202 from 40 CFR Part 60 Appendix A-1, or equivalent methods agreed to in advance by ORCAA. Use of EPA Reference Method 5 assumes all filterable particulate is PM ₁₀ .
VOC (Per EPA's Wood Products Protocol 1)	8.6 lbs/hr, 1-hr ave	EPA Method 1-4, and 25A from 40 CFR Part 60 Appendix A, or equivalent method agreed to in advance by ORCAA. Concurrent testing for both methanol and formaldehyde. VOC must be determined using EPA Method OTM-26 (see condition 8). Formaldehyde and methanol testing methods (or equivalent methods agreed to in advance by ORCAA): <ul style="list-style-type: none"> Methanol: EPA Method 308 or 320 from 40 CFR Part 63 Appendix A or NCASI method CI/WP-98.01 Formaldehyde: EPA Method 316 or 320 from 40 CFR Part 63 Appendix A or NCASI Method CI/WP-98.01
Opacity	5%, 6-minute average	EPA Method 9 from 40 CFR Part 60 Appendix A.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2); WAC 173-460-040(3)]

7. **Facility-wide Annual Emissions Limits.** Facility-wide annual emissions must not exceed the following limits in terms of tons per consecutive 12-month period:

Pollutant	Facility-Wide Limit (tons/12-month period)	Compliance Determination Methods
PM ₁₀ (filterable + condensable)	98	Compliance determined by calculating tons of each pollutant based on ORCAA-approved emissions factors and the actual fuels combusted, tons of pellets produced, and operating schedule over the previous 12-month period according to condition 8.
NO _x	230	
CO	185	
VOC as propane	67	

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2); WAC 173-460-040(3)]

8. **Monitoring Facility-Wide Emissions.** Compliance with facility-wide annual emissions must be determined monthly by calculating facility-wide total tons of each pollutant for the previous 12-consecutive month period as follows:
 - a) For the drying line:
 - i) PM₁₀ and VOC emissions must be calculated based on emission factors in terms of pounds per oven dried ton of pellets (lb/ODT) determined through source testing, times the actual tons of pellets produced, or an alternative method of calculation approved by ORCAA. Emissions factors must be updated with each required source test.

- ii) VOC emissions must be determined using EPA's Interim VOC Measurement Protocol for the Wood Products Industry – July 2007 (otherwise known as Other Test Method 26 or OTM-26) and includes quantification of the individual contributions of methanol and formaldehyde. VOC emissions calculated using this method are referred to as "WPP1 VOC".
 - iii) NOx and CO emissions must be determined using data from the NOx and CO continuous emission rate monitoring systems (CERMS) required by condition 11.
 - iv) Emissions from the dryer line during any period when pellets are not produced such as, but not limited to, startup, shutdown, and idle mode, must be included in the facility-wide total emissions.
 - b) For the pellet mill:
 - i) Emissions of NOx, CO, PM10 and VOC must be calculated based on emission factors in terms of pounds per oven dried ton of pellets produced (lb/ODT) determined through source testing, times the actual tons of pellets produced, or an alternative method of calculation approved by ORCAA. Emissions factors must be updated with each required source test.
 - ii) VOC emissions must be determined using EPA's Interim VOC Measurement Protocol for the Wood Products Industry – July 2007 (otherwise known as Other Test Method 26 or OTM-26) and includes quantification of the individual contributions of methanol and formaldehyde. VOC emissions calculated using this method are referred to as "WPP1 VOC".
 - iii) Emissions from the dryer line and pellet mill during any periods when pellets are not produced such as, but not limited to, startup, shutdown, and idle mode, must be included in the facility-wide total emissions.
 - c) PM10 emissions from process units (baghouses, cyclo-filters, silo vents) must be calculated based on 0.004 grains per standard cubic feet, and each unit's exhaust rate and the hours they operated, or an alternative method of calculation approved by ORCAA.
 - d) PM10 emissions from road dust created by traffic (front end loaders and trucks) must be calculated based on equations from AP-42 Section 13.2.2 and vehicle miles traveled at the facility by front end loaders and haul truck, or an alternative method of calculation approved by ORCAA.
 - e) PM10 emissions from process fugitive sources (truck dumpers, storage piles, chip screening) must be calculated based on equations from Particulate Matter Potential to Emit Emissions Factors for Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest Indian Country (EPA Region 10, May 8, 2014) and actual production over the 12-month period, or an alternative method of calculation approved by ORCAA.
- [Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2); WAC 173-460-040(3)]

9. **Furnace/Dryer Startups.** In addition to applicable general emissions limits and standards, the following requirements apply to operation of the furnace and drum dryer during startups:
- a) Cold startup must be initiated using clean, dry fuels including dry wood and ultra-low sulfur diesel.
 - b) Furnace exhaust during a startup may bypass the drying line air pollution control system through the furnace bypass stack provided:

- i) Bypass of the air pollution control system (cyclones, WESP, RTO) does not exceed 30 minutes during any single startup;
 - ii) The number of startups that bypass the air pollution control systems and exhaust through the furnace bypass stack does not exceed 10 startups per each 12-month period;
 - iii) Operation of the air pollution control system including the WESP and RTO are initiated so that these units are fully functional and ready to accept emissions from the furnace and dryer as soon as possible after a startup is initiated;
 - iv) Exhausting through the air pollution control system is initiated as soon as possible after a startup is initiated.
- c) A sufficient amount of clean dry fuel must be maintained at all times to minimize emissions during startups.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2); WAC 173-460-040(3)]

10. Furnace/Dryer Planned Shutdowns. In addition to applicable general emissions limits and standards, the following requirements apply to operation of the furnace and drum dryer during planned shutdowns:

- a) The air pollution control system must be fully functioning during a planned shutdown;
- b) Exhaust of hot gases through the furnace bypass stack during a planned shutdown may commence once there is no combustion occurring on the furnace grates;
- c) Exhaust of hot gases through the dryer bypass stack during a planned shutdown may commence once there is no combustion on the furnace grates and no material remaining in the drum dryer.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); WAC 173-400-113(2); WAC 173-460-040(3)]

11. Dryer Line Emissions Monitoring. Ongoing compliance with the drying line NO_x and CO limits in condition 5a must be continuously monitored using continuous emission rate monitoring systems (CERMS) for measuring NO_x and CO pollutant mass rates in lb/hr.

- a) The NO_x and CO CERMS must meet applicable requirements from 40 CFR Part 60, Appendix B.
- b) The NO_x and CO CERMS must meet applicable procedures and requirements from 40 CFR Part 60, Appendix F, including requirements and schedules for Relative Accuracy Test Audits (RATA).

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2)]

12. Performance Testing. The following requirements apply to performance testing including RATA of the NO_x and CO CERMS:

- a) Performance testing must be conducted consistent with an ORCAA approved test plan.
- b) A test plan must be submitted to ORCAA for approval at least 45 days prior to conducting a required performance test.
- c) The test plan must describe:
 - i) Air emissions test methods;
 - ii) Target operating conditions for testing;
 - iii) Performance indicators that will be monitored during the testing; and,
 - iv) Methods for calculating emissions factors.

- d) Performance testing must be conducted during operating conditions with highest emissions unless otherwise approved by ORCAA.
- e) Compliance with each emissions limit must be determined from the average of three separate 1-hour test runs unless otherwise approved by ORCAA.
- f) A test report must be submitted to ORCAA within 60-days of conducting any performance test.
- g) The test report must include for each test run:
 - i) The concentrations and pollutant mass rates in pounds per hour for each pollutant measured;
 - ii) Emissions factors in terms of pounds of pollutant per oven dry ton of pellets produced;
 - iii) The rate of pellet production;
 - iv) Key operating indicators of the source and pollution control technology.
- h) Performance testing of the RTO and RCO to demonstrate compliance with emissions limits and determine emissions factors must be completed within 180-days of commencing operation of the facility and repeated on a 5-year schedule thereafter.
- i) RATA of the NO_x and CO CERMS must be conducted concurrently with any required performance test of the RTO and according to the requirements from 40 CFR Part 60, Appendix F.
- j) Testing for formaldehyde and methanol must be conducted concurrently with VOC testing.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2)]

13. Operation and Maintenance Plan. The owner or operator must devise and implement an operation and maintenance plan (O&M Plan) to minimize emissions from all sources and modes of operation at the facility. The O&M Plan must be submitted to ORCAA for approval within the first six months from commencement of operation of the facility. The O&M Plan must include, but is not limited to, the following elements:

- a) Dust prevention plan describing company policies for vehicle speed limits, application of dust suppressants to haul roads, minimizing material drop heights, surveying the facility for fugitive dust; procedures for minimizing for fugitives during truck loading; and minimizing visible dust during feedstock and fuel dumps;
- b) Cyclo-filter maintenance plan that describes how acceptable operating pressure drop ranges will be determined and applied, how and when cyclo-filters will be inspected, and how filters will be maintained;
- c) WESP maintenance plan that describes how acceptable performance indicators will be determined, how quality of flush water will be maintained, how centrifuge cake will be disposed of, and detailed startup and shutdown procedures;
- d) RTO maintenance plan that describes how RTO performance will be monitored, when thermocouples will be changed out, and detailed startup and shutdown procedures;
- e) RCO maintenance plan that describes how RCO performance will be monitored, how performance of the catalyst will be monitored and maintained, and detailed startup and shutdown procedures;
- f) Detailed startup and shutdown procedures for the furnace and dryer;
- g) How proper combustion in the furnace will be monitored and maintained;

- h) Plan describing the means and methods for monitoring time emissions bypass air pollution control systems for both the dryer line and pellet mill.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2)]

14. **Emissions Inventory.** On an annual basis, the owner or operator must complete and submit to ORCAA an annual emissions inventory (inventory) of all regulated pollutants from all emissions units. Actual emissions must be based on actual operating data and ORCAA approved emission factors. The inventory must be accompanied by all associated calculations and data and must be certified by a Responsible Official as defined under WAC 173-401-200(27) as being true and accurate.

[Regulatory Basis: ORCAA Rule 8.11]

15. **Required Records.** The following records must be kept and made available when requested:

- a) The O&M plan required by condition 13;
- b) Manufacturer specifications for all cyclo-filters and baghouses as built identifying design air flow rates, pressure drops, and filtering efficiencies;
- c) Manufacturer specified or certified filtering efficiency for all silo vent filters;
- d) The number of truck dumps per day;
- e) Tons of pellets produced per day;
- f) Combustion chamber temperatures of the RTO and RCO;
- g) WESP KVA and MA of each of the three WESP fields;
- h) Number of occurrences, duration for each occurrence, and reason for emitting through either the furnace or drum dryer bypass stacks;
- i) The amount of diesel and clean, dry wood used during each cold startup;
- j) Daily record of the operating pressure drop across each baghouse and cyclo-filter;
- k) Monthly record of emissions calculations to demonstrate compliance with the emissions limits in condition 7; and,
- l) NO_x and CO CERMS certification and quality assurance records.

[Regulatory Basis: ORCAA Rule 8.11]

16. **Required Notifications, Reports and Applications.** The following notifications, reports, and applications must be submitted to ORCAA by the deadline specified:

- a) Any updates or revisions to the O&M plan required by condition 13 must be submitted to ORCAA for approval prior to implementing them;
- b) Notification by phone or email message of any complaint as soon as possible but in no case later than 24 hours of receiving the complaint;
- c) Title V Air Operating Permit (AOP) application within 12 months from commencing operation of the facility;
- d) Notification by phone or email of any emissions through the furnace or drum dryer bypass stacks as soon as possible but in no case later than 24 hours from initiation of the event;
- e) Notification of any excess emissions determined through the NO_x or CO CERMS as soon as possible but in no case later than 24 hours from the beginning of each event; and,
- f) Performance testing results within 45-days of conducting any performance test.

[Regulatory Basis: WAC 173-401-500; ORCAA Rule 8.11; ORCAA Rule 8.7; ORCAA Rule 5.1]

17. Preliminary Determination to Approve

This Final Determination documents ORCAA staff's determinations with respect to the applicable criteria of approval in ORCAA Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6. ORCAA staff recommends approval of PNWRE's proposal to construct a new wood pellet manufacturing facility, provided the conditions identified in Section 16 of this Preliminary Determination are implemented through an enforceable Order of Approval (AKA: Air Permit). Emissions calculations, modeling summary and other data supporting this Preliminary Determination are provided in the permit application.

~ end of section ~

Applicable General Performance Standards that apply to Pacific Northwest Renewable Energy (PNWRE) in Hoquiam, Washington

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	Applies to
False or Misleading Statements ORCAA Rule 7.2	Prohibits any person from willfully making a false or misleading statement to the Board or its representative as to any matter within the jurisdiction of the Board.	Applies generally to all air pollution sources
Unlawful Reproduction or Alteration of Documents ORCAA Rule 7.3	Prohibits reproducing or altering, or causing to be reproduced or altered, any order, registration certificate or other paper issued by the Agency if the purpose of such reproduction or alteration is to evade or violate any provision of these Regulations or any other law.	Applies generally to all air pollution sources
Display of Orders and Certificates ORCAA Rule 7.4	Any order or registration certificate required to be obtained by these Regulations shall be available on the premises designated on the order or certificate. In the event that the Agency requires order or registration certificate to be displayed, it shall be posted. No person shall mutilate, obstruct, or remove any order or registration certificate unless authorized to do so by the Board or the Executive Director.	The Approval Order issued in conjunction with this NOC approval must be retained on site.
General Requirements WAC 173-400-040(1)(c) ORCAA Rule 8.3	All emissions units are required to use reasonably available control technology (RACT).	Applies generally to all air pollution sources.
Visible Emissions WAC 173-400-040(2) ORCAA Rule 8.2(a)	Prohibits emissions with opacity of greater than 20% for more than three (3) minutes in any one hour.	Applies generally to all air pollution sources
Sulfur Dioxide WAC 173-400-040(7)	No person shall cause or allow the emission from any emissions unit in excess of one thousand ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of sixty consecutive minutes.	Applies generally to facilities that emit Sulfur Dioxide.
Control Equipment Maintenance and Repair ORCAA Rule 8.8	ORCAA Rule 8.8 requires that all air contaminant sources keep any process and/or air pollution control equipment in good operating condition and repair.	Applies generally to all air pollution control devices.
Fallout WAC 173-400-040(3) ORCAA Rule 8.3(e)	Prohibits particulate emissions from any source to be deposited, beyond the property under direct control of the owner or operator of the source, in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material was deposited.	Applies generally to all air pollution sources.
Fugitive Emissions WAC 173-400-040(4)(a)	The owner or operator of any emissions unit engaging in materials handling, construction, demolition, or other operation which is a source of fugitive emission shall take reasonable precautions to prevent the release of air contaminants from the operation.	Applies generally to any activity that results in fugitive emissions.

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	Applies to
ORCAA Rule 8.3(c)		
Odor WAC 173-400-040(5) ORCAA Rule 8.5	ORCAA Rule 8.5 contains general requirements for controlling odors and a general prohibition of odors that unreasonably interfere with the use or enjoyment of a person's property.	Applies generally to all air pollution sources.
Emissions Detrimental to Persons or Property WAC 173-400-040(6) ORCAA Rule 7.6	Prohibits causing or allowing the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business.	Applies generally to all air pollution sources
Concealment and Masking WAC 173-400-040(8) ORCAA Rule 7.5	Prohibits installation or use of any device or means to conceal or mask emissions of an air contaminant, which causes detriment to health, safety, or welfare of any person, or causes damage to property or business.	Applies generally to all air pollution sources
Fugitive Dust WAC 173-400-040(9)	The owner or operator of a source or activity that generates fugitive dust must take reasonable precautions to prevent that fugitive dust from becoming airborne and must maintain and operate the source to minimize emissions.	Applies to any activity that results in fugitive dust.
Particulate Standards for Process units ORCAA Rule 8.3(a) WAC 173-400-060	Prohibits emissions from any process unit in excess of 0.1 grain/dscf. EPA test methods from 40 CFR Appendix A shall be used should demonstration of compliance be required.	Applies to generally to all stationary process units that exhaust to the atmosphere.
Particulate Standards for Combustion Units ORCAA Rule 8.3(a) WAC 173-400-050(1)	Prohibits emissions from any combustion unit in excess of 0.1 grain/dscf. EPA test methods from 40 CFR Part 60 Appendix A shall be used should demonstration of compliance be required.	Applies generally to all stationary combustion units that exhaust to the atmosphere.
Excess Emissions Provisions WAC 173-400-107; WAC 173-400-108 ORCAA 8.7	Requires excess emissions be reported to the Agency as soon as possible and within 24 hours and establishes criteria qualifying excess emissions as unavoidable.	Applies generally to all air pollution sources
Record Keeping and Reporting. ORCAA Rule 8.11	Requires the following: 1. Maintenance of records on the nature and amounts of emissions and other related information as deemed necessary by ORCAA; 2. Reporting of emissions to ORCAA upon request.	Required of all facilities registered with ORCAA.

March 29, 2023

Danny Phipps
Air Quality Engineer 1
Southwest Clean Air Agency
11815 NE 99th Street, Suite 1294
Vancouver, WA 98682
Danny@swcleanair.org

RE: Completeness Determination for ADP Application CO-1057 dated August 25, 2022

Dear Danny Phipps:

Pinnacle Renewable Holdings (USA) Inc., branded as part of Drax (Drax) submitted an Air Discharge Permit (ADP) application (the Application) to the Southwest Clean Air Agency (SWCAA) in July 2022 for a new greenfield wood pellet processing facility in Longview, WA (the Facility). This letter includes information on the following items: (a) a summary of major changes to the Facility's design from that represented in the Application; (b) a summary of emission calculations and modeling changes; (c) a response to the August 25, 2022 SWCCA completeness determination letter for ADP Application CO-1057; and (d) responses to questions posed during a September 9, 2022 call between SWCAA, Drax, and Trinity Consultants. The completeness determination letter and relevant SWCAA correspondence can be found in Attachment 1.

SUMMARY OF PROCESS CHANGES

Abort Stacks

The dryer and furnace each have separate abort stacks prior to any control devices, herein referred to as the dryer abort stack and furnace abort stack. The only time the dryer abort stack will be used is during upset conditions (i.e., power outages, when the wet electrostatic precipitator (WESP) is in fault mode) and will not operate more than four hours in a day. The furnace abort stack is prior to the dryer and will be used during upset conditions (i.e., when the temperature or pressure gets too high in the furnace) and during a low idle state when the dryer is not operating. The furnace and dryer abort stacks will not be used during startup or shutdown events unless there is an upset condition as previously described. Emission calculations now include emissions that will be released from each of these two stacks.

Hammermills and Pelletizers

Instead of the cyclones described in the Application, the particulate matter (PM) emissions from the pelletizers will be controlled by a baghouse; the exhaust from the baghouse will be routed to the regenerative catalytic oxidizer (RCO). Additionally, exhaust from the hammermills will be routed to a baghouse (as originally described in the Application) and then to the same RCO as the pelletizers in order to control PM and VOC emissions, respectively. Pelletizer and hammermill VOC, hazardous air pollutant (HAP), and Washington toxic air pollutant (TAP) emission factors are obtained from stack test results from the Drax facility in Gloster, MS (ABE Facility). Maximum emission factors in pounds per oven dried ton (lbs/ODT) are obtained from 2018 and 2021 stack testing at the ABE Facility. The stack tests used as the basis for the emission factors are provided in Attachment 2 of this letter. The ABE Facility routes emissions from both the hammermills and pelletizers to

HEADQUARTERS

12700 Park Central Dr, Ste 2100, Dallas, TX 75251 / P 800.229.6655 / P 972.661.8100 / F 972.385.9203

an RCO, similar to the Facility. The emission factors are divided by 2 to represent half of the RCO emissions for the hammermills and pelletizers. A 25% safety factor has been applied to the emission factors for conservatism.

Emergency Engines

The emergency engines will be installed with diesel particulate filters (DPFs) that will provide at least 90% control of diesel particulate matter. In the Application, Drax proposed that the engines would operate a maximum of 200 hours per year (hrs/yr) of operation. Drax is now proposing that the engines operate a maximum of 125 hrs/yr. These changes are reflected in the updated emission calculations in Attachment 2.

SUMMARY OF EMISSION CALCULATION AND MODELING CHANGES

A summary of changes made to the emission calculations between the Application submittal and current submittal is provided below. Updated emission calculations for the Facility are provided in Attachment 2.

- ▶ HAP/TAP and VOC emissions from the hammermills and pelletizers were updated to use stack test data from a representative site, the ABE Facility in Gloster, MS. Additionally, HAP/TAP emissions from the dryer use stack test data from the ABE Facility to supplement the AP-42 factors used in the Application. A safety factor of 25% is applied to the emission factors for conservatism. This resulted in additional HAP/TAP being included in the emission calculations.
- ▶ Emission calculations for the dryer abort, furnace abort, and furnace idle scenarios were added.
 - The calculations for these scenarios assume the same emission factor basis as normal operation, without controls. Emission factors for criteria pollutants are back calculated using the manufacturer's guarantee of control efficiency and the manufacturer's controlled emission factors. Emission factors for HAPs/TAPs are determined from AP-42 Section 1.6 – Wood Residue Combustion and the stack testing completed in Gloster, MS.
 - Hours of operation for the dryer and furnace abort stacks are based on the following:
 - ◆ Dryer Abort = 50 hrs/yr or 4 hours/day at maximum heat input;
 - ◆ Furnace Abort (upset conditions) = 360 hrs/yr or 24 hours/day at maximum heat input; and
 - ◆ Furnace Abort (idle conditions) = 500 hrs/yr or 24 hours/day at 50% heat input.
- ▶ Emissions of SO₂ from the combustion of wood residuals were added to the dryer emission calculations using the emission factors from AP-42 Section 1.6-Wood Residue Combustion at hourly capacity.
- ▶ An updated dryer vendor guarantee was provided to Drax after the Application submittal. The following changes were made and are reflected in the emission calculations in Attachment 2 and vendor guarantee in Attachment 3:
 - Emission factors for CO and NO_x were updated to 42 pounds per hour (lbs/hr) and 52 lbs/hr respectively;
 - The heat input for the regenerative thermal oxidizer (RTO) was updated to 8.8 million British thermal units (MMBtu/hr); and
 - The heat input for the RCO was updated to 2.2 MMBtu/hr.
- ▶ Emission factors for particulate matter associated with the emergency engines were updated to use the Tier II EPA standards (0.20 g/kW-hr) for nonroad compression-ignition engines. Additionally, the fire pump and generator will be controlled by a diesel particulate filter able to achieve at least 90% particulate control. Use of these units will be limited to 125 hrs/yr.
- ▶ TAP emissions from the Facility are compared to both the 1998 and 2019 TAP rules¹ to determine pollutants required to show compliance with the acceptable source impact level (ASIL). Pollutants, on

¹ WAC 173-460

either TAP list, are modeled if (a) emission rates are above the SQER or (b) if there is an assigned ASIL, but no assigned SQER for a given pollutant (1998 rule only).²

The air dispersion model incorporated the above emission rate changes. Additionally, the following updates were made. Updated model input files are provided in Attachment 4.

- ▶ New emission points for the dryer abort, furnace abort, and furnace idle were added to the air dispersion models.³ Emissions from these sources and the emergency fire pump and generator are modeled in addition to the normal operating scenario with continuous operation (8,760 hrs/yr). For modeled short term results there are several available scenarios detailed below. Results are detailed for the highest modeled concentration from any given scenario. All scenarios assume the emergency fire pump and generator are operating at the same time as a given scenario for conservatism.
 - Normal – furnace exhaust is routed to the dryer, control devices associated with the dryer are operating, and all units are at full capacity.
 - FRNA – dryer is not operational (removal of source RTO), furnace is operating at maximum heat input and emissions are routed through the furnace abort stack.
 - FRNI – dryer is not operational (removal of source RTO), furnace is operating at 50% of maximum heat input and emissions are routed through the furnace abort stack.
 - RD – furnace is not operational (removal of source RTO), dryer is operating at maximum throughput and emissions are routed through the dryer abort stack. The dryer abort stack is limited to four hours of operation per day.
 - RD & FRN – emissions from dryer and furnace are routed to individual abort stacks, each at 100% capacity. The dryer abort stack is limited to four hours of operation per day.
 - Emissions from both the dryer and furnace abort stacks are included in the criteria pollutant and TAP models.
- ▶ With the addition of SO₂ emissions from wood combustion, a 1-hr SO₂ model was added to show compliance with the NAAQS.
- ▶ The inventory of TAPs modeled to show compliance with the ASIL expanded with the update to include the 2019 rule and the additional TAP emissions detailed in the previous section. All model results show compliance with the 2019 TAP rule.

² This TAP analysis methodology is based on guidance from Danny Phipps (SWCAA) via email communication on February 3, 2023.

³ Stack parameters (height and diameter) for the dryer and furnace abort stacks were obtained from Drax personnel via email communication on December 1, 2022. All other dispersion parameters were obtained from the dryer island mass balances included in Attachment 3.

AUGUST 25, 2022 SWCAA LETTER

The August 25, 2022 SWCAA letter is included in Attachment 1 of this letter. SWCAA's requests are provided in **bold text** while Drax's responses are in normal text.

- 1. Hammermill TAP Emissions. In the submitted application Trinity stated that toxic air pollutant (TAP) emission factors with an EPA rating of C, D, or E were not evaluated. For this reason, TAP emissions for the Hammermills were not included as part of the application. The potential to emit for the Hammermills for volatile organic compounds (VOC) was calculated to be 151.91 tons per year. Based on the character of these emissions, it is likely that TAPs are emitted and Drax must produce an estimate of these emissions and perform the associated modeling.**

Hammermill TAP emissions have been included in the updated emission calculations for the Facility. As discussed previously, emission factors from the ABE Facility are used to calculate emission estimates for the hammermill. Because these emissions are now being routed to the RCO, total annual VOC emissions are estimated to be 17.57 tons per year (tpy). These changes are reflected in the updated emission calculations in Attachment 2 and air dispersion modeling files in Attachment 4.

- 2. Best Available Control Technology (BACT) Analysis for the Rotary Dryer. Trinity stated that the only reasonable control option for nitrogen oxides (NO_x) is good combustion controls/practices. More detail needs to be provided as to why additional controls for NO_x are not cost effective.**

Drax will install and operate low NO_x burners on the furnace/rotary dryer. A low NO_x burner is a demonstrated control technology in pellet manufacturing facilities and is technically feasible for NO_x control. As such, the proposed burners will be classified as low NO_x burners and will constitute BACT for the dryer's NO_x emissions. A guarantee from the dryer vendor is included in Attachment 3.

Please find below an updated top-down NO_x BACT analysis for the furnace/rotary dryer.

BACT Analysis for NO_x Emissions

Step 1: Identify All Available Control Technologies

NO_x emissions result primarily from thermal NO_x formation from nitrogen and oxygen in the combustion air. An RBLC search was performed to identify NO_x control technologies. The following technologies were identified for use on dryers of similar capacity to Drax's proposed dryer (≥100 MMBtu/hr):

- ▶ Low NO_x Burner (LNB)
- ▶ Good Combustion Controls/Practices

Drax considers these technologies to be available for the dryer.

Step 2: Eliminate Technically Infeasible Options

A LNB is a demonstrated control technology in pellet manufacturing facilities; as such, it is technically feasible for NO_x control.

Step 3: Rank Remaining Control Technologies by Effectiveness

The following control technologies are available and feasible to control NO_x emissions from the dryer:

1. LNB
2. Good Combustion Practices

Drax proposes LNB as BACT for the furnace/rotary dryer's NO_x emissions.

3. **Alternative Operating Scenarios.** It is the understanding of SWCAA that in some cases, an electrostatic precipitator (ESP) cannot be utilized immediately upon startup. If the ESP is not actively controlling emissions, it is presumed that the regenerative thermal oxidizer (RTO) must be bypassed as well. Drax must come up with an estimate of the length of the startup period and emission factors must be provided for the startup period. Drax must also provide some assurance that ambient air quality standards will not be violated during this period. If there are similar alternative operating scenarios, they must be identified as well.

Before the dryer can be started and run, the WESP and RTO must be available. The WESP and RTO will function while the dryer is started up, such that PM and VOC emissions are controlled before exhausting to the atmosphere. Similarly, the WESP and RTO will operate during shutdown of the dryer. Additional information is included in a letter from the dryer vendor in Attachment 3.

4. **Wood Species.** Emissions can vary dramatically based on the wood species burned. SWCAA requests information about what wood species will be burned at the processing facility, and how the wood species will impact emissions.

Drax will predominantly burn the wood species Spruce-Pine-Fir (SPF). The potential criteria pollutant emissions of the dryer are based on vendor guarantees, with the exception of SO₂, which is based on an emission factor from EPA's AP-42 and is not specific to the species of wood burned. SPF-specific emission factors could not be found for HAP/TAP emissions from a dryer comparable to Drax's proposed dryer for the Facility. AP-42 biomass combustion HAP/TAP emission factors are used. HAP/TAP emission factors from Drax's Gloster, MS facility were incorporated to supplement the AP-42 factors and are expected to be the most representative emission factors available.

5. **Fugitive Emissions.** In the application, the truck tipper that processes wet material is assumed to have zero fugitive emissions and the ship loadout is estimated to have negligible emissions. SWCAA requests additional details including video of other facilities or descriptions of process enclosure which assure that these emissions will be minimal.

Please refer to the video for the truck tipper at the following link: [BRUKS - Keystone Drive-over Truck Dumper Showcase Video.](#)

Refer to the emission calculations in Table C-8 as provided in Attachment 2 of this letter for quantified ship loadout emissions. The ship loadout system will use a Cleveland Cascade spout with a skirt to minimize fugitive emissions from loading pellets into ships.

6. **BACT for particulate matter (PM) control at the Pelletizer.** Pelletizing potential PM emissions are estimated assuming an emission rate of 0.005 gr/dscf. This is considered BACT for dust collectors, however in this case a scrubber is used. Drax must provide analysis or a manufacturers guarantee demonstrating that the scrubber will meet the proposed emission standards.

As described in the "Summary of Process Changes" section above, Drax proposes a baghouse to control PM emissions from the pelletizers rather than the cyclones described in the Application.

Among technically feasible options, Drax ranked the following technologies for further review: baghouse, WESP, dry ESP, scrubber, and cyclone. Baghouses, WESPs, and dry ESPs can generally be designed with control efficiencies up to 99.9% for PM emissions, while scrubbers can reach 95%.^{4,5,6,7} Cyclones are primarily used to control particulate matter greater than 10 micrometers; accordingly, the control efficiencies are as follows: 90% for PM and PM₁₀, 40% for PM_{2.5}.⁸ As such, cyclones alone are not considered BACT for control of particulate emissions from Pelletizers.

Due to its equally as high control efficiency as the other control technologies, Drax proposes the use of a baghouse as BACT for the pelletizer's PM emissions. Based on the BACT determination for dust collectors, use of a baghouse will achieve a limit of 0.005 gr/dscf.

- 7. Operating Parameters. The application does not specify essential operating parameters of the emission control devices. The following information, at minimum, must be provided:**
- a) Operating parameters for the cyclone scrubber that controls the pelletizer:**
 - 1. The minimum water recirculation rate; and**
 - 2. The maximum differential pressure.**
 - b) Operating parameters for baghouses that control the truck tipper and the hammermills:**
 - 1. The maximum differential pressure.**
 - c) Operating parameters for the ESP that controls the rotary dryer:**
 - 1. the minimum current level in each ESP field;**
 - 2. the minimum secondary voltage in each ESP field;**
 - 3. the minimum spark rate in each ESP field;**
 - 4. the minimum outlet temperature.**

Drax will utilize a baghouse instead of a cyclone scrubber for control of the pelletizer emissions. The maximum differential pressure of the hammermill, pelletizer, and truck tipper baghouses are unknown as of the date of this letter.

Operating parameters of the ESP for the rotary dryer are as follows:

- 1. Minimum current level in each ESP field of 800 Milliampere (mA)
- 2. Minimum secondary voltage in each ESP field of 50 kilovolts (kV)
- 3. Minimum spark rate in each ESP field of 20 sparks per minute
- 4. Minimum outlet temperature of 160 °F

⁴ EPA, *Air Pollution Control Technology Fact Sheet, Fabric filter Pulse-jet cleaned type (also referred to as Baghouses)*, EPA-452/F-03-025. (<https://www3.epa.gov/ttnchie1/mkb/documents/ff-pulse.pdf>)

⁵ EPA, *Air Pollution Control Technology Fact Sheet, Wet Electrostatic Precipitator (ESP)- Wire-Plate Type*, EPA-452/F-03-030. (<https://www3.epa.gov/ttnchie1/mkb/documents/fwespwpl.pdf>)

⁶ EPA, *Air Pollution Control Technology Fact Sheet, Dry Electrostatic Precipitator (ESP)- Wire-Plate Type*, EPA-452/F-03-027. (<https://www3.epa.gov/ttnecat1/dir1/fdespwpi.pdf>)

⁷ EPA, *Air Pollution Control Technology Fact Sheet, Packed-Bed/Packed-Tower Wet Scrubber*, EPA-452/F-03-015. (<https://www3.epa.gov/ttnecat1/dir1/fpack.pdf>)

⁸ EPA, *Air Pollution Control Technology Fact Sheet, Cyclones*, EPA-452/F-03-005 (<https://www3.epa.gov/ttnchie1/mkb/documents/fcyclon.pdf>)

8. Sulfur dioxide (SO₂) Emissions. No sulfur dioxide emissions are estimated for wood combustion. Drax must provide as estimate of sulfur dioxide emissions or provide data or rational explaining why this is not necessary.

SO₂ emissions for wood combustion at the furnace have been included using emission factors from AP-42 Table 1.6-2 for Wood Residue Combustion. These changes are reflected in the updated emission calculations in Attachment 2.

9. Design Criteria for Control Equipment. More information is required regarding the design criteria of the ESP and the cyclone scrubber. The information provided in the application is not sufficient for SWCAA to evaluate whether the designed equipment can control emissions at the expected level. For each piece of control equipment on site Drax must provide the following information:

- a) Make and model;
- b) Maximum rated load/capacity;
- c) Operating parameters associated with the equipment;
- d) Height, diameter, flow, and configuration of the ambient discharge point; and
- e) Manufacturer's control efficiency guarantees for relevant pollutants.

Design criteria is included for each control device in the table below:

Table 1. Control Device Design Criteria

Control Device	Make and Model	Maximum Rated Load/ Capacity	Associated Operating Parameters	Height, Diameter, Flow, and Configuration of Discharge	Manufacturer's Control Efficiency Guarantees
RCO	TBD. 120,000 acfm RCO.	2.2 MMBtu/hr	Temperature: 120°F Particulate: ≤115 mg/Nm ³ Humidity: ≥5 vol% Gas Pressure: 20-40 psig	Height: 60 ft Diameter: 72 in Exhaust Stack	VOC: ≥94%
Hammermill Baghouse	Allied/Air-Cure 544RF1 2W	44,200 acfm	TBD	Height (above ground): 60 ft Diameter: 6.56 ft Flow: 19.7 ft/sec Exhaust Stack	PM: ≤0.005 gr/dscf
Pelletizer Baghouse	Allied/Air-Cure 544RF1 2W	76,000 acfm	TBD	Height (above ground): 60 ft Diameter: 6.56 ft Flow: 19.7 ft/sec Exhaust Stack	PM: ≤0.005 gr/dscf
Truck Tipper Baghouse	Donaldson Torit 200RP	27,700 acfm	TBD	Height (above ground): 41.7 ft Diameter: 2.99 ft Flow: 65.4 ft/sec	PM: ≤0.002 gr/dscf

Control Device	Make and Model	Maximum Rated Load/ Capacity	Associated Operating Parameters	Height, Diameter, Flow, and Configuration of Discharge	Manufacturer's Control Efficiency Guarantees
				Exhaust Stack	
WESP	TSI-WESP-936		Pressure: $\pm 25''$ w.c. pH: 6-8 <i>See Question 7 for remaining parameters</i>	Centrifuge, routed to RTO Exhaust Stack	PM (front-half): $\geq 95\%$
RTO	TSI-RTO-4 CAN-11'x34;	8.8 MMBtu/hr	Gas Pressure: 20-40 psig Temperature: $\geq 1500^{\circ}\text{F}$ Residence Time: ≥ 0.5 sec	Height: 60 ft Diameter: 90 in Exhaust Stack	VOC: $\geq 95\%$; PM (back-half): $\geq 95\%$

10. Binding Agent. The application does not cite the use of any binding agent in the pelletizing process. If binding agents are used in the process, Drax must submit chemical constituent data for each binding agent and provide an estimate of associated pollutant emissions.

There will not be any binding agent used in the pelletizing process.

11. VOC Emissions from Stockpile Storage. Drax estimated PM emissions from stockpile storage, however wood products can also produce VOCs. Drax must provide an estimate of VOC emissions from these stockpiles and provide a plan for minimizing these emissions.

Per a September 9, 2022 SWCAA email, it was determined that additional information was needed to ensure that odors from stockpiles would be minimized. The stockpiles will be on site for a continual rollover basis. Drax will target to maintain a half-month's supply necessary to operate the plant. At some points in the year (notably, winter and spring), Drax will increase this volume to address supply risks – potentially up to one month. Across its facilities, Drax typically only measures the temperatures of its grind piles on an as-needed basis to address concerns. Drax does not plan to measure pH.

12. Compliance Assurance Monitoring. The application describes emission units that have a control device and emit over 100 ton of a pollutant, prior to the control unit. These units meet the criteria under 40 cfr part 64 and a plan must be provided for continuous compliance assurance.

Per 40 CFR 64.5(b) and if applicable to the emission units at the facility, Compliance Assurance Monitoring (CAM) requirements are to be submitted as part of a Title V renewal application. Drax will evaluate applicability of the CAM requirements in the initial Title V application for the Facility.

SWCAA QUESTIONS FROM 9/9/2022 CONFERENCE CALL

SWCAA's questions from the September 9, 2022 conference call are provided in **bold text** while Drax's responses are in normal text.

1. Did Drax evaluate the feasibility of installing a scrubber to control PM emissions from the hammermills?

Baghouses can generally be designed with control efficiencies up to 99.9% for PM emissions, while scrubbers can reach 95%.^{9,10} To achieve the best available control efficiency, Drax is proposing the installation of a baghouse to control PM from the hammermills. The baghouse will achieve a grain loading limit of 0.005 gr/dscf.

2. Would Drax prefer a large testing event every five years, or to test a smaller number of emission units each year?

Drax prefers to conduct a single testing event every five years.

~~~~~

If you have any questions or comments about the information presented in this letter, please do not hesitate to call me at 253.867.5600 x4804.

Sincerely,

TRINITY CONSULTANTS



Jennifer Pohlman  
Senior Consultant

Attachments

cc: Wayne Kooy, Drax Group (Vancouver, BC)  
Melissa Hillman, Trinity Consultants (Portland, Oregon)

---

<sup>9</sup> EPA, *Air Pollution Control Technology Fact Sheet, Fabric filter Pulse-jet cleaned type (also referred to as Baghouses)*, EPA-452/F-03-025. (<https://www3.epa.gov/ttnchie1/mkb/documents/ff-pulse.pdf>)

<sup>10</sup> EPA, *Air Pollution Control Technology Fact Sheet, Packed-Bed/Packed-Tower Wet Scrubber*, EPA-452/F-03-015. (<https://www3.epa.gov/ttnecat1/dir1/fpack.pdf>)

## **ATTACHMENT 1**

### **SWCAA Letter and Relevant Email Correspondence**



August 25, 2022

Wayne Kooy, Senior Environmental Manager  
Drax Group  
543 Granville Street, Suite 1100, Vancouver, BC V6C 1X8

**RE: Completeness Determination for ADP Application CO-1057**

Dear Mr. Kooy:

The Southwest Clean Air Agency (SWCAA) has received your Air Discharge Permit (ADP) application to install and operate a wood pellet processing facility, submitted by Trinity Consultants on your behalf. This application has been designated as ADP Application CO-1057.

SWCAA has determined, after review, that the application is incomplete under SWCAA 400-110(2). Additional information is needed before SWCAA can continue processing the application. Please provide the following no later than **September 30, 2022**:

- Hammermill TAP Emissions. In the submitted application Trinity stated that toxic air pollutant (TAP) emission factors with an EPA rating of C, D, or E were not evaluated. For this reason, TAP emissions for the Hammermills were not included as part of the application. The potential to emit for the Hammermills for volatile organic compounds (VOC) was calculated to be 151.91 tons per year. Based on the character of these emissions, it is likely that TAPs are emitted and Drax must produce an estimate of these emissions and perform the associated modeling.
- Best Available Control Technology (BACT) Analysis for the Rotary Dryer. Trinity stated that the only reasonable control option for nitrogen oxides (NO<sub>x</sub>) is good combustion controls/practices. More detail needs to be provided as to why additional controls for NO<sub>x</sub> are not cost effective.
- Alternative Operating Scenarios. It is the understanding of SWCAA that in some cases, an electrostatic precipitator (ESP) cannot be utilized immediately upon startup. If the ESP is not actively controlling emissions, it is presumed that the regenerative thermal oxidizer (RTO) must be bypassed as well. Drax must come up with an estimate of the length of the startup period and emission factors must be provided for the startup period. Drax must also provide some assurance that ambient air quality standards will not be violated during this period. If there are similar alternative operating scenarios, they must be identified as well.
- Wood Species. Emissions can vary dramatically based on the wood species burned. SWCAA requests information about what wood species will be burned at the processing facility, and how the wood species will impact emissions.
- Fugitive Emissions. In the application, the truck tipper that processes wet material is assumed to have zero fugitive emissions and the ship loadout is estimated to have negligible emissions. SWCAA requests additional details including video of other facilities or descriptions of process enclosure which assure that these emissions will be minimal.
- BACT for particulate matter (PM) control at the Pelletizer. Pelletizing potential PM emissions are estimated assuming an emission rate of 0.005 gr/dscf. This is considered BACT for dust collectors, however in this case a scrubber is used. Drax must provide analysis or a





manufacturers guarantee demonstrating that the scrubber will meet the proposed emission standards.

- Operating Parameters. The application does not specify essential operating parameters of the emission control devices. The following information, at minimum, must be provided:
  - a) Operating parameters for the cyclone scrubber that controls the pelletizer:
    - 1. The minimum water recirculation rate; and
    - 2. The maximum differential pressure.
  - b) Operating parameters for baghouses that control the truck tipper and the hammermills:
    - 1. The maximum differential pressure.
  - c) Operating parameters for the ESP that controls the rotary dryer:
    - 1. the minimum current level in each ESP field;
    - 2. the minimum secondary voltage in each ESP field;
    - 3. the minimum spark rate in each ESP field;
    - 4. the minimum outlet temperature.
- Sulfur dioxide (SO<sub>2</sub>) Emissions. No sulfur dioxide emissions are estimated for wood combustion. Drax must provide an estimate of sulfur dioxide emissions or provide data or rationale explaining why this is not necessary.
- Design Criteria for Control Equipment. More information is required regarding the design criteria of the ESP and the cyclone scrubber. The information provided in the application is not sufficient for SWCAA to evaluate whether the designed equipment can control emissions at the expected level. For each piece of control equipment on site Drax must provide the following information:
  - a) Make and model;
  - b) Maximum rated load/capacity;
  - c) Operating parameters associated with the equipment;
  - d) Height, diameter, flow, and configuration of the ambient discharge point; and
  - e) Manufacturer's control efficiency guarantees for relevant pollutants.
- Binding Agent. The application does not cite the use of any binding agent in the pelletizing process. If binding agents are used in the process, Drax must submit chemical constituent data for each binding agent and provide an estimate of associated pollutant emissions.
- VOC Emissions from Stockpile Storage. Drax estimated PM emissions from stockpile storage, however wood products can also produce VOCs. Drax must provide an estimate of VOC emissions from these stockpiles and provide a plan for minimizing these emissions.
- Compliance Assurance Monitoring. The application describes emission units that have a control device and emit over 100 tons of a pollutant, prior to the control unit. These units meet the criteria under 40 CFR part 64 and a plan must be provided for continuous compliance assurance.

Should additional time for preparation of the above items be needed, SWCAA will grant any reasonable request. Please note that SWCAA may still request additional information to clarify the application during the forthcoming permitting process. If you need further assistance or have any questions on this matter, please contact me at (360) 574-3058 ext. 124.

Sincerely,



Danny Phipps  
Air Quality Engineer I

**From:** [Danny Phipps](#)  
**To:** [Jennifer Pohlman](#)  
**Cc:** [Wayne Kooy](#); [Melissa Hillman](#); [Maddie Coates](#)  
**Subject:** RE: Drax Longview 2019 TAP Rule  
**Date:** Friday, February 3, 2023 1:05:48 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)

---

Good afternoon Jennifer,

My answers are below in **Red**. Let me know if you need further clarification beyond what it written below.

Thanks,

Danny Phipps, PE  
Air Quality Engineer  
Southwest Clean Air Agency  
360-574-3058 x 124  
[danny@swcleanair.gov](mailto:danny@swcleanair.gov)



Hours: Tuesday through Friday 7:00 am to 5:30 pm

---

**From:** Jennifer Pohlman <JPohlman@trinityconsultants.com>  
**Sent:** Friday, February 3, 2023 9:40 AM  
**To:** Danny Phipps <Danny@swcleanair.org>  
**Cc:** Wayne Kooy <Wayne.Kooy@drax.com>; Melissa Hillman <MHillman@trinityconsultants.com>; Maddie Coates <Madison.Coates@trinityconsultants.com>  
**Subject:** Drax Longview 2019 TAP Rule

Danny,

We completed a full comparison of TAP emissions from the Drax Longview site to the 2019 TAP rule and we are able to get all pollutants to pass the SQER/ASIL using the 2019 TAP rule. We just wanted to get confirmation from you on how we should proceed with the TAP comparison:

- Were you able to get confirmation that it is acceptable to compare to the 2019 SQERs and ASILs instead of or in addition to the 1998 thresholds? If so:
  - Should we use the 1998 rule and compare to the 2019 ASIL for pollutants which exceed the 1998 ASIL but have a higher ASIL in the 2019 rule? Or
  - Should we compare all TAP to the 2019 rule thresholds?

If a TAP is not listed in the 2019 rule, but it is in the 1998 list, then use the 1998 standard. For all other pollutants the 2019 ASIL should be used. Make a note of those that exceed the 1998 standard. In the technical support document of the permit I will reference the conversation with Gary Palcisko and the letter that was issued for Sierra Pacific.

Also, just a few miscellaneous items:



- Regarding modeling of emergency engines, would you agree that it is appropriate to model only projected operating hours for testing and maintenance, rather than using the PTE estimate of 200 hrs/yr (which includes emergency hours of operation)?

The PTE estimate should be used as it considers both estimated emergency usage and the operation and maintenance time.

- We wanted to follow-up on whether we can annualize emissions from the abort stacks for short-term modeling purposes.

Since those scenarios amount to almost 1,000 hours and are planned we have decided that it would not be appropriate to average them over the course of the year. Please model those as short term emissions (not annualized).

Please let us know if you have any questions.

Thank you,

Jennifer

**Jennifer Pohlman**  
Senior Consultant  
Trinity Consultants, Inc.

P 253.867.5600 x4804  
20819 72<sup>nd</sup> Avenue S., Suite 610, Kent, WA 98032  
Email: [jpohlman@trinityconsultants.com](mailto:jpohlman@trinityconsultants.com)



Connect with us: [LinkedIn](#) / [Facebook](#) / [Twitter](#) / [YouTube](#) / [trinityconsultants.com](http://trinityconsultants.com)

Stay current on environmental issues. [Subscribe](#) today to receive Trinity's free *EHS Quarterly*.

**CAUTION:** This email originated from outside of the Trinity Consultants organization. Do not click links or open attachments unless you recognize the sender's name, sender's email address and know the content is safe.

## **ATTACHMENT 2**

### **Updated Potential Emission Calculations and Stack Test Data**

**Table C-1a. Input Values**

|                                                             |         |         |
|-------------------------------------------------------------|---------|---------|
| Total Pellet Throughput <sup>1</sup>                        | 450,000 | ODMT/yr |
| Hourly Pellet Throughput <sup>1</sup>                       | 62      | ODMT/hr |
| Total Dryer Throughput                                      | 450,000 | ODMT/yr |
| Max Hourly Dryer Throughput <sup>1</sup>                    | 62      | ODMT/hr |
| Total Hammermill Throughput                                 | 450,000 | ODMT/yr |
| Max Hourly Hammermill Throughput <sup>1</sup>               | 75      | ODMT/hr |
| Total Pellet Cooler Throughput                              | 450,000 | ODMT/yr |
| Max Hourly Pellet Cooler Throughput <sup>1</sup>            | 75      | ODMT/hr |
| Facility Operating Hours                                    | 8,760   | hrs/yr  |
| Controlled Hammermill VOC Emission Factor <sup>3</sup>      | 0.071   | lb/ODT  |
| Controlled Pellet Cooler VOC Emission Factor <sup>3</sup>   | 0.071   | lb/ODT  |
| RTO VOC Control Efficiency for Rotary Dryer                 | 95%     |         |
| RTO CO Control Efficiency for Rotary Dryer                  | 0%      |         |
| RCO VOC Control Efficiency for Pellet Cooler and Hammermill | 95%     |         |
| RCO CO Control Efficiency for Pellet Cooler and Hammermill  | 0%      |         |

<sup>1</sup> Maximum throughputs were provided to Trinity Consultants in process flow diagram on 12/21/2021.

<sup>2</sup> RTO and RCO control efficiencies per manufacturer specification sheets.

<sup>3</sup> Emission factors obtained from the Drax facility in Gloster, MS (ABE) stack testing. Maximum emission factors in lbs/ODT obtained from 2018 and 2021 stack testing. The ABE facility routes emissions from both the hammermill and pelletizer to the RCO similar to the proposed Longview facility. The emission factors are divided by 2 to represent half of the RCO emissions for each piece of equipment. A 25% safety factor has been included for conservatism.

**Table C-1b. Conversion Factors**

|   |           |   |       |               |
|---|-----------|---|-------|---------------|
| 1 | short ton | = | 0.907 | metric tonnes |
|---|-----------|---|-------|---------------|

Table C-2a. Facility-Wide Potential Emissions - Criteria Pollutant Summary

| EU ID                                                        | Emission Sources                                                | Title V/PSD Fugitive? | Facility-Wide Potential Emissions (tpy) |                        |                         |                 |                 |               |              |                   |
|--------------------------------------------------------------|-----------------------------------------------------------------|-----------------------|-----------------------------------------|------------------------|-------------------------|-----------------|-----------------|---------------|--------------|-------------------|
|                                                              |                                                                 |                       | PM                                      | Total PM <sub>10</sub> | Total PM <sub>2.5</sub> | SO <sub>2</sub> | NO <sub>x</sub> | VOC           | CO           | CO <sub>2</sub> e |
| BIO                                                          | Biosizer                                                        | Yes                   | 5.37E-03                                | 2.54E-03               | 3.85E-04                | --              | --              | --            | --           | --                |
| RD                                                           | Biomass Rotary Dryer                                            | No                    | 21.90                                   | 21.90                  | 21.90                   | 20.55           | 227.76          | 65.70         | 183.96       | 178,574.43        |
| DCS                                                          | Dry Chip Storage Tent                                           | Yes                   | 0.06                                    | 0.03                   | 3.98E-03                | --              | --              | --            | --           | --                |
| HM1                                                          | Hammermill No. 1                                                | No                    |                                         |                        |                         |                 |                 |               |              |                   |
| HM2                                                          | Hammermill No. 2                                                | No                    |                                         |                        |                         |                 |                 |               |              |                   |
| HM3                                                          | Hammermill No. 3                                                | No                    | 7.52                                    | 7.52                   | 7.52                    | --              | --              | 17.57         | --           | --                |
| HM4                                                          | Hammermill No. 4                                                | No                    |                                         |                        |                         |                 |                 |               |              |                   |
| PC1                                                          | Pelletizer No. 1                                                | No                    |                                         |                        |                         |                 |                 |               |              |                   |
| PC2                                                          | Pelletizer No. 2                                                | No                    |                                         |                        |                         |                 |                 |               |              |                   |
| PC3                                                          | Pelletizer No. 3                                                | No                    |                                         |                        |                         |                 |                 |               |              |                   |
| PC4                                                          | Pelletizer No. 4                                                | No                    |                                         |                        |                         |                 |                 |               |              |                   |
| PC5                                                          | Pelletizer No. 5                                                | No                    |                                         |                        |                         |                 |                 |               |              |                   |
| PC6                                                          | Pelletizer No. 6                                                | No                    | 12.93                                   | 12.93                  | 12.93                   | --              | --              | 17.57         | --           | --                |
| PC7                                                          | Pelletizer No. 7                                                | No                    |                                         |                        |                         |                 |                 |               |              |                   |
| PC8                                                          | Pelletizer No. 8                                                | No                    |                                         |                        |                         |                 |                 |               |              |                   |
| PC9                                                          | Pelletizer No. 9                                                | No                    |                                         |                        |                         |                 |                 |               |              |                   |
| PC10                                                         | Pelletizer No. 10                                               | No                    |                                         |                        |                         |                 |                 |               |              |                   |
| PC11                                                         | Pelletizer No. 11                                               | No                    |                                         |                        |                         |                 |                 |               |              |                   |
| PSS1                                                         | Pellet Storage Dome 1                                           | No                    | 0.04                                    | 0.02                   | 2.54E-03                | --              | --              | --            | --           | --                |
| PSS2                                                         | Pellet Storage Dome 2                                           | No                    | 0.04                                    | 0.02                   | 2.54E-03                | --              | --              | --            | --           | --                |
| SLS                                                          | Ship Loadout System                                             | Yes                   | 0.07                                    | 0.03                   | 0.01                    | --              | --              | --            | --           | --                |
| HR                                                           | Haul Roads                                                      | Yes                   | 2.39                                    | 0.48                   | 0.12                    | --              | --              | --            | --           | --                |
| SP1                                                          | Wet Material Stockpile                                          | Yes                   | 0.38                                    | 0.18                   | 0.03                    | --              | --              | --            | --           | --                |
| ENG1                                                         | 625 kW Emergency Generator                                      | No                    | 1.72E-03                                | 1.72E-03               | 1.72E-03                | 5.55E-04        | 1.17            | 0.03          | 0.31         | 60.71             |
| FWP1                                                         | 164 kW Fire Pump Engine                                         | No                    | 4.52E-04                                | 4.52E-04               | 4.52E-04                | 0.03            | 0.42            | 0.03          | 0.09         | 15.90             |
| BAG2                                                         | Truck Tipper                                                    | No                    | 1.80                                    | 1.80                   | 1.80                    | --              | --              | --            | --           | --                |
| RTO                                                          | Dryer RTO ( <i>Emissions from Natural Gas Combustion</i> )      | No                    | --                                      | --                     | --                      | 0.02            | --              | --            | --           | 4,561.54          |
| RCO                                                          | Pelletizer RCO ( <i>Emissions from Natural Gas Combustion</i> ) | No                    | 0.07                                    | 0.07                   | 0.07                    | 0.01            | 0.94            | 0.05          | 0.79         | 1,140.38          |
| RD - A                                                       | Biomass Rotary Dryer - Abort                                    | No                    | 2.50                                    | 2.50                   | 2.50                    | 0.12            | 1.30            | 7.50          | 1.05         | 1,230.18          |
| FRN - A                                                      | Furnace - Abort                                                 | No                    | 19.49                                   | 17.47                  | 15.10                   | 0.84            | 7.43            | 0.57          | 20.27        | 6,736.89          |
| FRN                                                          | Furnace - Idle                                                  | No                    | 13.54                                   | 12.13                  | 10.49                   | 0.59            | 5.16            | 0.40          | 14.08        | 4,678.40          |
| <b>Total Point Source Emissions (Title V/PSD Regulated):</b> |                                                                 |                       | <b>79.8</b>                             | <b>76.4</b>            | <b>72.3</b>             | <b>22.2</b>     | <b>244.2</b>    | <b>109.4</b>  | <b>220.6</b> | <b>196,998</b>    |
| <b>Total Emissions (including fugitives):</b>                |                                                                 |                       | <b>82.7</b>                             | <b>77.1</b>            | <b>72.5</b>             | <b>22.2</b>     | <b>244.2</b>    | <b>109.44</b> | <b>220.6</b> | <b>196,998</b>    |
| <b>Title V Threshold:</b>                                    |                                                                 |                       | --                                      | <b>100.0</b>           | <b>100.0</b>            | <b>100.0</b>    | <b>100.0</b>    | <b>100.00</b> | <b>100.0</b> | --                |
| <b>Title V Threshold Exceeded (Yes/No):</b>                  |                                                                 |                       | <b>No</b>                               | <b>No</b>              | <b>No</b>               | <b>No</b>       | <b>Yes</b>      | <b>Yes</b>    | <b>Yes</b>   | <b>No</b>         |
| <b>PSD Threshold (tons/12-months):</b>                       |                                                                 |                       | <b>250</b>                              | <b>250</b>             | <b>250</b>              | <b>250</b>      | <b>250</b>      | <b>250</b>    | <b>250</b>   | <b>100,000</b>    |
| <b>PSD Threshold Exceeded<sup>1</sup> (Yes/No):</b>          |                                                                 |                       | <b>No</b>                               | <b>No</b>              | <b>No</b>               | <b>No</b>       | <b>No</b>       | <b>No</b>     | <b>No</b>    | <b>Yes</b>        |

<sup>1</sup> PSD for GHG is only exceeded if PSD is exceeded for another regulated pollutant.

Table C-2b. Facility-Wide Potential Emissions - HAP/TAP Summary

| Pollutants                   | CAS #      | HAP?      | 1998 TAP? | 1998 TAP Class | 2019 TAP? | Dryer                    |                            | RTO                      |                            | RCO                      |                            | Hammermill               |                            | Pelletizers              |                            | Dryer - Abort            |                            | Furnace - Abort          |                            | Furnace - Idle           |                            | Emergency Engines        |                            | Total                    |                            | 1998 SQER <sup>1</sup> |          |          | 2019 SQER |                  |         | Modeling Required? |
|------------------------------|------------|-----------|-----------|----------------|-----------|--------------------------|----------------------------|--------------------------|----------------------------|--------------------------|----------------------------|--------------------------|----------------------------|--------------------------|----------------------------|--------------------------|----------------------------|--------------------------|----------------------------|--------------------------|----------------------------|--------------------------|----------------------------|--------------------------|----------------------------|------------------------|----------|----------|-----------|------------------|---------|--------------------|
|                              |            |           |           |                |           | Maximum Hourly Emissions | Potential Annual Emissions | Maximum Hourly Emissions | Potential Annual Emissions | Maximum Hourly Emissions | Potential Annual Emissions | Maximum Hourly Emissions | Potential Annual Emissions | Maximum Hourly Emissions | Potential Annual Emissions | Maximum Hourly Emissions | Potential Annual Emissions | Maximum Hourly Emissions | Potential Annual Emissions | Maximum Hourly Emissions | Potential Annual Emissions | Maximum Hourly Emissions | Potential Annual Emissions | Maximum Hourly Emissions | Potential Annual Emissions |                        |          |          |           |                  |         |                    |
|                              |            |           |           |                |           | (lb/hr)                  | (tpy)                      | (lb/hr)                  | (tpy)                      | (lb/hr)                  | (tpy)                      | (lb/hr)                  | (tpy)                      | (lb/hr)                  | (tpy)                      | (lb/hr)                  | (tpy)                      | (lb/hr)                  | (tpy)                      | (lb/hr)                  | (tpy)                      | (lb/hr)                  | (tpy)                      | (lb/hr)                  | (tpy)                      | (lb/hr)                | (tpy)    | (lb/hr)  | (tpy)     | Averaging Period | (lb/yr) |                    |
| Acenaphthene                 | 83-32-9    | Yes - PAH | No        | --             | No        | 8.54E-06                 | 3.74E-05                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 1.71E-04                 | 4.27E-06                   | 1.71E-04                 | 3.07E-05                   | 8.54E-05                 | 2.14E-05                   | 0                        | 0                          | 3.42E-04                 | 9.38E-05                   | --                     | --       | --       | --        | --               | No      |                    |
| Aceaphthylene                | 208-96-8   | Yes - PAH | No        | --             | No        | 4.69E-05                 | 2.06E-04                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 9.39E-04                 | 2.35E-05                   | 9.39E-04                 | 1.69E-04                   | 4.69E-04                 | 1.17E-04                   | 0                        | 0                          | 1.88E-03                 | 5.15E-04                   | --                     | --       | --       | --        | --               | No      |                    |
| Acetaldehyde                 | 75-07-0    | Yes       | Yes       | A              | Yes       | 5.67E-01                 | 2.06E+00                   | 0                        | 0                          | 0                        | 0                          | 2.18E-03                 | 5.41E-01                   | 1.80E-01                 | 5.41E-01                   | 1.13E+01                 | 2.83E-01                   | 1.56E-01                 | 2.80E-02                   | 7.79E-02                 | 1.95E-02                   | 0                        | 0                          | 1.17E+01                 | 3.47E+00                   | Annual                 | 5.00E+01 | --       | year      | 6.00E+01         | Yes     |                    |
| Acrolein                     | 107-02-8   | Yes       | Yes       | B              | Yes       | 2.43E-01                 | 8.82E-01                   | 0                        | 0                          | 0                        | 0                          | 8.18E-04                 | 2.03E-01                   | 6.74E-02                 | 2.03E-01                   | 4.86E+00                 | 1.21E-01                   | 0                        | 0                          | 4.93E+00                 | 1.41E+00                   | 0                        | 0                          | 4.93E+00                 | 1.41E+00                   | 1-hr and Annual        | 1.75E+02 | 2.00E-02 | 24-hr     | 2.60E-02         | Yes     |                    |
| Anthracene                   | 120-12-7   | Yes - PAH | No        | --             | No        | 2.82E-05                 | 1.23E-04                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 5.63E-04                 | 1.41E-05                   | 5.63E-04                 | 1.01E-04                   | 2.82E-04                 | 7.04E-05                   | 0                        | 0                          | 1.13E-03                 | 3.09E-04                   | --                     | --       | --       | --        | --               | No      |                    |
| Benz(a)anthracene            | 56-55-3    | Yes - PAH | Yes       | A              | Yes       | 6.10E-07                 | 2.67E-06                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 1.22E-05                 | 3.05E-07                   | 1.22E-05                 | 2.20E-06                   | 6.10E-06                 | 1.53E-06                   | 0                        | 0                          | 2.44E-05                 | 6.70E-06                   | N/A                    | --       | --       | year      | 8.90E-01         | No      |                    |
| Benzene                      | 71-43-2    | Yes       | Yes       | A              | Yes       | 3.94E-02                 | 1.73E-01                   | 1.81E-05                 | 7.94E-05                   | 4.53E-06                 | 1.98E-05                   | 0                        | 0                          | 0                        | 0                          | 7.88E-01                 | 1.97E-02                   | 7.88E-01                 | 1.42E-01                   | 3.94E-01                 | 9.85E-02                   | 0                        | 0                          | 1.58E+00                 | 4.33E-01                   | Annual                 | 2.00E+01 | --       | year      | 2.10E+01         | Yes     |                    |
| Benzo(a)pyrene               | 50-32-8    | Yes - PAH | Yes       | A              | Yes       | 2.44E-05                 | 1.07E-04                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 4.88E-04                 | 1.22E-05                   | 4.88E-04                 | 8.78E-05                   | 2.44E-04                 | 6.10E-05                   | 0                        | 0                          | 9.76E-04                 | 2.68E-04                   | N/A                    | --       | --       | year      | 1.60E-01         | Yes     |                    |
| Benzo(b)fluoranthene         | 205-99-2   | Yes - PAH | Yes       | A              | Yes       | 9.39E-07                 | 4.11E-06                   | 0                        | 0                          | 0                        | 0                          | 1.88E-05                 | 4.69E-07                   | 1.88E-05                 | 4.69E-07                   | 1.88E-05                 | 3.38E-06                   | 9.39E-06                 | 2.35E-06                   | 9.39E-06                 | 2.35E-06                   | 0                        | 0                          | 3.75E-05                 | 1.03E-05                   | N/A                    | --       | --       | year      | 8.90E-01         | No      |                    |
| Benzo(g,h,i)perylene         | 191-24-2   | Yes - PAH | No        | --             | No        | 8.73E-07                 | 3.82E-06                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 1.75E-05                 | 4.36E-07                   | 1.75E-05                 | 3.14E-06                   | 8.73E-06                 | 2.18E-06                   | 0                        | 0                          | 3.49E-05                 | 9.58E-06                   | N/A                    | --       | --       | year      | 8.90E-01         | No      |                    |
| Benzo(k)fluoranthene         | 207-08-9   | Yes - PAH | Yes       | A              | Yes       | 3.38E-07                 | 1.48E-06                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 6.76E-06                 | 1.69E-07                   | 6.76E-06                 | 1.22E-06                   | 3.38E-06                 | 8.45E-07                   | 0                        | 0                          | 1.35E-05                 | 3.71E-06                   | N/A                    | --       | --       | year      | 8.90E-01         | No      |                    |
| Chrysene                     | 218-01-9   | Yes - PAH | No        | --             | Yes       | 3.57E-07                 | 1.56E-06                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 7.13E-06                 | 1.78E-07                   | 7.13E-06                 | 1.28E-06                   | 3.57E-06                 | 8.92E-07                   | 0                        | 0                          | 1.43E-05                 | 3.92E-06                   | N/A                    | --       | --       | year      | 8.90E+00         | No      |                    |
| Dibenz(a,h)anthracene        | 53-70-3    | Yes - PAH | Yes       | A              | Yes       | 8.54E-08                 | 3.74E-07                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 1.71E-06                 | 4.27E-08                   | 1.71E-06                 | 3.07E-07                   | 8.54E-07                 | 2.14E-07                   | 0                        | 0                          | 3.42E-06                 | 9.38E-07                   | N/A                    | --       | --       | year      | 8.20E-02         | No      |                    |
| Fluoranthene                 | 206-44-0   | Yes - PAH | No        | --             | No        | 1.50E-05                 | 6.58E-05                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 3.00E-04                 | 7.51E-06                   | 3.00E-04                 | 5.41E-05                   | 1.50E-04                 | 3.75E-05                   | 0                        | 0                          | 6.01E-04                 | 1.65E-04                   | --                     | --       | --       | --        | --               | No      |                    |
| Fluorene                     | 86-73-7    | Yes - PAH | No        | --             | No        | 3.19E-05                 | 1.40E-04                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 6.38E-04                 | 1.60E-05                   | 6.38E-04                 | 1.15E-04                   | 3.19E-04                 | 7.98E-05                   | 0                        | 0                          | 1.28E-03                 | 3.50E-04                   | --                     | --       | --       | --        | --               | No      |                    |
| Formaldehyde                 | 50-00-0    | Yes       | Yes       | A              | Yes       | 1.43E+00                 | 5.17E+00                   | 6.47E-04                 | 2.83E-03                   | 1.62E-04                 | 7.09E-04                   | 2.09E-03                 | 5.18E-01                   | 1.72E-01                 | 5.18E-01                   | 2.85E+01                 | 7.13E-01                   | 8.26E-01                 | 1.49E-01                   | 4.13E-01                 | 1.03E-01                   | 0                        | 0                          | 2.95E+01                 | 7.18E+00                   | Annual                 | 2.00E+01 | --       | year      | 2.70E+01         | Yes     |                    |
| Hydrochloric acid            | 7647-01-0  | Yes       | Yes       | B              | Yes       | 1.78E-01                 | 6.46E-01                   | 0                        | 0                          | 0                        | 0                          | 4.54E-04                 | 1.13E-01                   | 3.75E-02                 | 1.13E-01                   | 3.56E+00                 | 8.91E-02                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 3.60E+00                 | 9.61E-01                   | 1-hr and Annual        | 1.75E+02 | 2.00E-02 | 24-hr     | 6.70E-01         | Yes     |                    |
| Indeno(1,2,3-c,d)pyrene      | 193-39-5   | Yes - PAH | Yes       | A              | Yes       | 8.16E-07                 | 3.58E-06                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 1.63E-05                 | 4.08E-07                   | 1.63E-05                 | 2.94E-06                   | 8.16E-06                 | 2.04E-06                   | 0                        | 0                          | 3.27E-05                 | 8.97E-06                   | N/A                    | --       | --       | year      | 8.90E-01         | No      |                    |
| Methanol                     | 67-56-1    | Yes       | Yes       | B              | Yes       | 2.56E+00                 | 9.29E+00                   | 0                        | 0                          | 0                        | 0                          | 2.42E-02                 | 5.99E+00                   | 1.99E+00                 | 5.99E+00                   | 5.12E+01                 | 1.28E+00                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 5.32E+01                 | 2.26E+01                   | 1-hr and Annual        | 4.37E+04 | 5.00E+00 | 24-hr     | 1.50E+03         | Yes     |                    |
| Naphthalene                  | 91-20-3    | Yes - PAH | Yes       | B              | Yes       | 9.10E-04                 | 3.99E-03                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 1.82E-02                 | 4.55E-04                   | 1.82E-02                 | 3.28E-03                   | 9.10E-03                 | 2.28E-03                   | 0                        | 0                          | 3.64E-02                 | 1.00E-02                   | 1-hr and Annual        | 2.28E+04 | 2.60E+00 | year      | 4.80E+00         | Yes     |                    |
| Octachlorodibenzo-p-dioxins  | 3268-87-9  | No        | No        | --             | Yes       | 6.19E-07                 | 2.71E-06                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 1.24E-05                 | 3.10E-07                   | 1.24E-05                 | 2.23E-06                   | 6.19E-06                 | 1.55E-06                   | 0                        | 0                          | 2.48E-05                 | 6.80E-06                   | N/A                    | --       | --       | year      | 1.50E-02         | No      |                    |
| Pentachlorodibenzo-p-dioxins | 40321-76-4 | No        | No        | --             | Yes       | 1.41E-08                 | 6.17E-08                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 2.82E-07                 | 7.04E-09                   | 2.82E-07                 | 5.07E-08                   | 1.41E-07                 | 3.52E-08                   | 0                        | 0                          | 5.63E-07                 | 1.55E-07                   | N/A                    | --       | --       | year      | 4.30E-06         | Yes     |                    |
| Phenanthrene                 | 85-01-8    | Yes - PAH | No        | --             | No        | 6.57E-05                 | 2.88E-04                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 1.31E-03                 | 3.28E-05                   | 1.31E-03                 | 2.37E-04                   | 6.57E-04                 | 1.64E-04                   | 0                        | 0                          | 2.63E-03                 | 7.21E-04                   | --                     | --       | --       | --        | --               | No      |                    |
| Phenol                       | 108-95-2   | Yes       | Yes       | B              | Yes       | 1.10E+00                 | 4.00E+00                   | 0                        | 0                          | 0                        | 0                          | 1.31E-02                 | 3.24E+00                   | 1.08E+00                 | 3.24E+00                   | 2.20E+01                 | 5.51E-01                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 2.31E+01                 | 1.10E+01                   | 1-hr and Annual        | 1.05E+04 | 1.20E+00 | 24-hr     | 1.50E+01         | Yes     |                    |
| Propionaldehyde              | 123-38-6   | Yes       | Yes       | B              | Yes       | 1.62E-01                 | 5.85E-01                   | 0                        | 0                          | 0                        | 0                          | 2.00E-03                 | 4.96E-01                   | 1.65E-01                 | 4.96E-01                   | 3.24E+00                 | 8.10E-02                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 3.41E+00                 | 1.66E+00                   | No SQER                | --       | --       | 24-hr     | 5.90E-01         | Yes     |                    |
| Pyrene                       | 129-00-0   | Yes - PAH | No        | --             | No        | 3.47E-05                 | 1.52E-04                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 6.94E-04                 | 1.74E-05                   | 6.94E-04                 | 1.25E-04                   | 3.47E-04                 | 8.68E-05                   | 0                        | 0                          | 1.39E-03                 | 3.81E-04                   | --                     | --       | --       | --        | --               | No      |                    |
| Arsenic                      | 7440-38-2  | Yes       | Yes       | A              | Yes       | 2.06E-04                 | 9.04E-04                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 4.13E-03                 | 1.03E-04                   | 4.13E-03                 | 7.43E-04                   | 2.06E-03                 | 5.16E-04                   | 0                        | 0                          | 8.26E-03                 | 2.27E-03                   | No SQER                | --       | --       | year      | 4.90E-02         | Yes     |                    |
| Beryllium                    | 7440-41-7  | Yes       | Yes       | A              | Yes       | 1.03E-05                 | 4.52E-05                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 2.06E-04                 | 5.16E-06                   | 2.06E-04                 | 3.72E-05                   | 1.03E-04                 | 2.58E-05                   | 0                        | 0                          | 4.13E-04                 | 1.13E-04                   | No SQER                | --       | --       | year      | 6.80E-02         | Yes     |                    |
| Cadmium                      | 7440-43-9  | Yes       | Yes       | A              | Yes       | 3.85E-05                 | 1.69E-04                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 7.70E-04                 | 1.92E-05                   | 7.70E-04                 | 1.39E-04                   | 3.85E-04                 | 9.62E-05                   | 0                        | 0                          | 1.54E-03                 | 4.22E-04                   | No SQER                | --       | --       | year      | 3.90E-02         | Yes     |                    |
| Chromium VI                  | 18540-29-9 | No        | Yes       | A              | Yes       | 3.28E-05                 | 1.44E-04                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 6.57E-04                 | 1.64E-05                   | 6.57E-04                 | 1.18E-04                   | 3.28E-04                 | 8.21E-05                   | 0                        | 0                          | 1.31E-03                 | 3.61E-04                   | No SQER                | --       | --       | year      | 6.50E-04         | Yes     |                    |
| Chromium III                 | 16065-83-1 | No        | Yes       | B              | Yes       | 1.97E-04                 | 8.63E-04                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 3.94E-03                 | 0                          | 3.94E-03                 | 7.10E-04                   | 1.97E-03                 | 4.93E-04                   | 0                        | 0                          | 7.88E-03                 | 2.07E-03                   | 1-hr and Annual        | 1.75E+02 | 2.00E-02 | 24-hr     | 7.40E-03         | Yes     |                    |
| Chromium II                  | 7440-47-3  | Yes       | Yes       | B              | No        | 1.97E-04                 | 8.63E-04                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 3.94E-03                 | 9.85E-05                   | 3.94E-03                 | 7.10E-04                   | 1.97E-03                 | 4.93E-04                   | 0                        | 0                          | 7.88E-03                 | 2.16E-03                   | 1-hr and Annual        | 1.75E+02 | 2.00E-02 | --        | --               | No      |                    |
| Copper                       | 7440-50-8  | No        | Yes       | B              | Yes       | 4.60E-04                 | 2.01E-03                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 9.20E-03                 | 2.30E-04                   | 9.20E-03                 | 1.66E-03                   | 4.60E-03                 | 1.15E-03                   | 0                        | 0                          | 1.84E-02                 | 5.05E-03                   | 1-hr and Annual        | 1.75E+02 | 2.00E-02 | 1-hr      | 1.90E-01         | No      |                    |
| Manganese                    | 7439-96-5  | Yes       | Yes       | B              | Yes       | 1.50E-02                 | 6.58E-02                   | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 0                        | 0                          | 3.00E-01                 | 7.51E-03                   | 3.00E-01                 | 5.41E-02                   | 1.50E-01                 | 3.75E-02                   | 0                        | 0                          | 6.01E-01                 | 1.65E-01                   | 1-hr and Annual        | 1.75E+02 | 2.00E-02 | 24-hr     | 2.20E-02         | Yes     |                    |
| Mercury                      | 7439-      |           |           |                |           |                          |                            |                          |                            |                          |                            |                          |                            |                          |                            |                          |                            |                          |                            |                          |                            |                          |                            |                          |                            |                        |          |          |           |                  |         |                    |

**Table C-3a. Biomass Rotary Dryer Operating Parameters**

| <b>Parameter</b>                                   | <b>Value</b> | <b>Units</b> |
|----------------------------------------------------|--------------|--------------|
| Max Hourly Throughput                              | 68.3         | ODT/hr       |
| Max Annual Throughput                              | 496,040      | ODT/yr       |
| Maximum Heat Input                                 | 187.7        | MMBtu/hr     |
| Wood and Wood Residuals Heating Value <sup>1</sup> | 17.48        | MMBtu/ODT    |
| Maximum Annual Operation                           | 8,760        | hr/yr        |

<sup>1</sup>

Wood and wood residuals heating value provided in 40 CFR Appendix Table C-1 to Subpart C of Part 98.

**Table C-3b. Biomass Rotary Dryer Potential Emissions - Criteria Pollutants**

| <b>Pollutant</b>             | <b>Maximum Hourly Emissions<sup>1</sup><br/>(lb/hr)</b> | <b>Potential Annual Emissions<br/>(tpy)</b> |
|------------------------------|---------------------------------------------------------|---------------------------------------------|
| PM                           | 5.00                                                    | 21.90                                       |
| PM <sub>10</sub>             | 5.00                                                    | 21.90                                       |
| PM <sub>2.5</sub>            | 5.00                                                    | 21.90                                       |
| SO <sub>2</sub> <sup>2</sup> | 4.69                                                    | 20.55                                       |
| NO <sub>x</sub>              | 52.00                                                   | 227.76                                      |
| VOC                          | 15.00                                                   | 65.70                                       |
| CO                           | 42.00                                                   | 183.96                                      |

<sup>1</sup> Hourly emission rates from the RTO stack are obtained from vendor guarantees provided by TSI on September 9th, 2022.

<sup>2</sup> SO<sub>2</sub> emissions estimated using AP-42 Table 1.6-2 for Wood Residue Combustion. Emission factor is given in lb/MMBtu and converted to lbs/hr using the maximum heat input of the furnace.

**Table C-3c. Biomass Rotary Dryer Potential Emissions - GHG**

| <b>Fuel</b>           | <b>Wood Drying CO<sub>2</sub><br/>Emission Factor<sup>1</sup><br/>(lb/ODT)</b> | <b>CO<sub>2</sub><br/>Emissions<br/>(tpy)</b> |
|-----------------------|--------------------------------------------------------------------------------|-----------------------------------------------|
| Wood & wood residuals | 720                                                                            | 178,574                                       |

<sup>1</sup> Wood drying emission factors for CO<sub>2</sub> are from AP-42 Table 10.6.1-2.

Table C-3d. Biomass Rotary Dryer Potential Emissions - HAP/TAP

| Pollutant                                                     | CAS #      | HAP?      | TAP? | Biomass Combustion Emission Factor <sup>1</sup> (lb/MMBtu) | ABE Stack Test Factors <sup>2</sup> (lb/ODT) | Maximum Hourly Emissions <sup>3,4</sup> (lb/hr) | Potential Annual Emissions <sup>3,4</sup> (tpy) |
|---------------------------------------------------------------|------------|-----------|------|------------------------------------------------------------|----------------------------------------------|-------------------------------------------------|-------------------------------------------------|
| Acenaphthene                                                  | 83-32-9    | Yes - PAH | No   | 9.10E-07                                                   | --                                           | 8.54E-06                                        | 3.74E-05                                        |
| Acenaphthylene                                                | 208-96-8   | Yes - PAH | No   | 5.00E-06                                                   | --                                           | 4.69E-05                                        | 2.06E-04                                        |
| Acetaldehyde                                                  | 75-07-0    | Yes       | Yes  | 8.30E-04                                                   | 8.29E-03                                     | 5.67E-01                                        | 2.06E+00                                        |
| Acrolein                                                      | 107-02-8   | Yes       | Yes  | --                                                         | 3.55E-03                                     | 2.43E-01                                        | 8.82E-01                                        |
| Anthracene                                                    | 120-12-7   | Yes - PAH | No   | 3.00E-06                                                   | --                                           | 2.82E-05                                        | 1.23E-04                                        |
| Benzo(a)anthracene                                            | 56-55-3    | Yes - PAH | Yes  | 6.50E-08                                                   | --                                           | 6.10E-07                                        | 2.67E-06                                        |
| Benzene                                                       | 71-43-2    | Yes       | Yes  | 4.20E-03                                                   | --                                           | 3.94E-02                                        | 1.73E-01                                        |
| Benzo(a)pyrene                                                | 50-32-8    | Yes - PAH | Yes  | 2.60E-06                                                   | --                                           | 2.44E-05                                        | 1.07E-04                                        |
| Benzo(b)fluoranthene                                          | 205-99-2   | Yes - PAH | Yes  | 1.00E-07                                                   | --                                           | 9.39E-07                                        | 4.11E-06                                        |
| Benzo(g,h,i)perylene                                          | 191-24-2   | Yes - PAH | No   | 9.30E-08                                                   | --                                           | 8.73E-07                                        | 3.82E-06                                        |
| Benzo(k)fluoranthene                                          | 207-08-9   | Yes - PAH | Yes  | 3.60E-08                                                   | --                                           | 3.38E-07                                        | 1.48E-06                                        |
| Chrysene                                                      | 218-01-9   | Yes - PAH | No   | 3.80E-08                                                   | --                                           | 3.57E-07                                        | 1.56E-06                                        |
| Dibenzo(a,h)anthracene                                        | 53-70-3    | Yes - PAH | Yes  | 9.10E-09                                                   | --                                           | 8.54E-08                                        | 3.74E-07                                        |
| Fluoranthene                                                  | 206-44-0   | Yes - PAH | No   | 1.60E-06                                                   | --                                           | 1.50E-05                                        | 6.58E-05                                        |
| Fluorene                                                      | 86-73-7    | Yes - PAH | No   | 3.40E-06                                                   | --                                           | 3.19E-05                                        | 1.40E-04                                        |
| Formaldehyde                                                  | 50-00-0    | Yes       | Yes  | 4.40E-03                                                   | 2.09E-02                                     | 1.43E+00                                        | 5.17E+00                                        |
| Hydrochloric Acid                                             | 7647-01-0  | Yes       | Yes  | --                                                         | 2.61E-03                                     | 1.78E-01                                        | 6.46E-01                                        |
| Indeno(1,2,3-c,d)pyrene                                       | 193-39-5   | Yes - PAH | Yes  | 8.70E-08                                                   | --                                           | 8.16E-07                                        | 3.58E-06                                        |
| Methanol                                                      | 67-56-1    | Yes       | Yes  | --                                                         | 3.74E-02                                     | 2.56E+00                                        | 9.29E+00                                        |
| Naphthalene                                                   | 91-20-3    | Yes - PAH | Yes  | 9.70E-05                                                   | --                                           | 9.10E-04                                        | 3.99E-03                                        |
| Octachlorodibenzo-p-dioxins (2,3,7,8 TCDD Eqv.) <sup>5</sup>  | 3268-87-9  | No        | No   | 6.60E-08                                                   | --                                           | 1.86E-10                                        | 8.14E-10                                        |
| Pentachlorodibenzo-p-dioxins (2,3,7,8 TCDD Eqv.) <sup>5</sup> | 40321-76-4 | No        | No   | 1.50E-09                                                   | --                                           | 1.41E-08                                        | 6.17E-08                                        |
| Phenanthrene                                                  | 85-01-8    | Yes - PAH | No   | 7.00E-06                                                   | --                                           | 6.57E-05                                        | 2.88E-04                                        |
| Phenol                                                        | 108-95-2   | Yes       | Yes  | --                                                         | 1.61E-02                                     | 1.10E+00                                        | 4.00E+00                                        |
| Propionaldehyde                                               | 123-38-6   | Yes       | Yes  | --                                                         | 2.37E-03                                     | 1.62E-01                                        | 5.88E-01                                        |
| Pyrene                                                        | 129-00-0   | Yes - PAH | No   | 3.70E-06                                                   | --                                           | 3.47E-05                                        | 1.52E-04                                        |
| Arsenic                                                       | 7440-38-2  | Yes       | Yes  | 2.20E-05                                                   | --                                           | 2.06E-04                                        | 9.04E-04                                        |
| Beryllium                                                     | 7440-41-7  | Yes       | Yes  | 1.10E-06                                                   | --                                           | 1.03E-05                                        | 4.52E-05                                        |
| Cadmium                                                       | 7440-43-9  | Yes       | Yes  | 4.10E-06                                                   | --                                           | 3.85E-05                                        | 1.69E-04                                        |
| Chromium, Total                                               | 7440-47-3  | Yes       | Yes  | 2.10E-05                                                   | --                                           | 1.97E-04                                        | 8.63E-04                                        |
| Chromium, Hexavalent <sup>6</sup>                             | 18540-29-9 | No        | Yes  | 3.50E-06                                                   | --                                           | 3.28E-05                                        | 1.44E-04                                        |
| Copper                                                        | 7440-50-8  | No        | Yes  | 4.90E-05                                                   | --                                           | 4.60E-04                                        | 2.01E-03                                        |
| Manganese                                                     | 7439-96-5  | Yes       | Yes  | 1.60E-03                                                   | --                                           | 1.50E-02                                        | 6.58E-02                                        |
| Mercury                                                       | 7439-97-6  | Yes       | Yes  | 3.50E-06                                                   | --                                           | 6.57E-04                                        | 2.88E-03                                        |
| Nickel                                                        | 7440-02-0  | Yes       | Yes  | 3.30E-05                                                   | --                                           | 3.10E-04                                        | 1.36E-03                                        |
| Selenium                                                      | 7782-49-2  | Yes       | Yes  | 2.80E-06                                                   | --                                           | 2.63E-05                                        | 1.15E-04                                        |
| Zinc                                                          | 7440-66-6  | No        | No   | 4.20E-04                                                   | --                                           | 3.94E-03                                        | 1.73E-02                                        |
| <b>Total HAP Maximum Individual HAP</b>                       |            |           |      |                                                            |                                              | <b>22.88</b>                                    | <b>9.29</b>                                     |

<sup>1</sup> Emission factors for biomass (wood residue) combustion are uncontrolled and from AP-42, Section 1.6 (Wood Residue Combustion), Tables 1.6-3 and 1.6-4. Pollutants with an emission factor rating of C, D, or E are not included.

<sup>2</sup> Emission factors obtained from Drax ABE facility in Gloster, MS stack testing. Maximum emission factors in lbs/ODT from 2018 and 2021 stack testing. A 25% safety factor has been included for conservatism.

<sup>3</sup> Organic TAP are controlled by RTO. Control efficiency is provided by LDX Solutions for VOC compounds as:

95%

<sup>4</sup> TAP emitted as PM are controlled by WESP. A minimum control efficiency according to an EPA Air Pollution Control Technology Fact Sheet on WESP is:

95%

Because mercury is a liquid at ambient temperature, it is not emitted in the form of PM. Therefore, it is uncontrolled.

<sup>5</sup> Dioxin and furan emissions apply a toxic equivalency (TEQ) factor obtained from the 72 FR 26545 in accordance with the 1998 TAP rule WAC 173-460-050(4)(b) adopted by SWCAA. Emissions shown in this table are expressed as an equivalent emissions of 2,3,7,8 TCDD. <https://www.govinfo.gov/content/pkg/FR-2007-05-10/pdf/E7-9015.pdf>

Octachlorodibenzo-p-dioxins TEQ: 0.0003

Pentachlorodibenzo-p-dioxins TEQ: 1

<sup>6</sup> Because the emission factor for "Chromium, Total" has an "A" rating and it is likely that a portion is in the form of hexavalent chromium, it conservative to use the emission factor for "Chromium, Hexavalent" even though it has a "C" rating.

**Table C-4a. RTO Burner Operating Parameters**

| Parameter                                | Units |             |
|------------------------------------------|-------|-------------|
| Unit Heat Input                          | 8.8   | MMBtu/hr    |
| Natural Gas Heating Value <sup>1</sup>   | 1,020 | MMBtu/MMscf |
| Annual Operation                         | 8,760 | hr/yr       |
| Potential Annual Fuel Usage <sup>2</sup> | 75.6  | MMscf/yr    |

<sup>1</sup> Natural Gas HHV is the average from the range listed in AP-42, Section 1.4.

<sup>2</sup> Potential Annual Fuel Usage calculated as follows:

Annual Fuel Usage (MMscf/yr) = Heat Input (MMBtu/hr) / Natural Gas HHV (MMBtu/MMscf) x Annual Operation (hr/yr)

**Table C-4b. RTO Potential Emissions - Criteria Pollutants**

| Pollutant <sup>1</sup>         | Natural Gas Uncontrolled Emission Factor (lb/MMscf) | Maximum Hourly Emissions (lb/hr) | Potential Annual Emissions (tpy) |
|--------------------------------|-----------------------------------------------------|----------------------------------|----------------------------------|
| Total PM                       | --                                                  | --                               | --                               |
| PM <sub>10</sub>               | --                                                  | --                               | --                               |
| PM <sub>2.5</sub>              | --                                                  | --                               | --                               |
| SO <sub>2</sub>                | 0.6                                                 | 5.18E-03                         | 2.27E-02                         |
| NO <sub>x</sub>                | --                                                  | --                               | --                               |
| VOC                            | --                                                  | --                               | --                               |
| CO                             | --                                                  | --                               | --                               |
| CH <sub>4</sub>                | 2.3                                                 | 1.98E-02                         | 8.69E-02                         |
| N <sub>2</sub> O               | 2.2                                                 | 1.90E-02                         | 8.31E-02                         |
| CO <sub>2</sub>                | 120,000                                             | 1035                             | 4535                             |
| CO <sub>2</sub> e <sup>2</sup> | 120,713                                             | 1041                             | 4562                             |

<sup>1</sup> Uncontrolled emission factors for natural gas combustion from AP-42, Section 1.4 - Natural Gas Combustion, Table 1.4-1, 1.4-2, 1.4-3, and 1.4-4. Emissions for CO, NO<sub>x</sub>, VOC, and PM from the RTO are included in the dryer calculations.

<sup>2</sup> Global warming potential (GWP) for CH<sub>4</sub> is 25 and N<sub>2</sub>O is 298 for estimating CO<sub>2</sub>e emissions (40 CFR 98, Subpart A, Table A-1, effective January 1, 2014).

**Table C-4c. RTO Potential Emissions - HAP/TAP**

| Pollutant                     | CAS #   | HAP? | TAP? | Natural Gas Uncontrolled Emission Factor <sup>1</sup> (lb/MMscf) | Maximum Hourly Emissions <sup>2</sup> (lb/hr) | Potential Annual Emissions <sup>2</sup> (tpy) |
|-------------------------------|---------|------|------|------------------------------------------------------------------|-----------------------------------------------|-----------------------------------------------|
| Benzene                       | 71-43-2 | Yes  | Yes  | 2.10E-03                                                         | 1.81E-05                                      | 7.94E-05                                      |
| Formaldehyde                  | 50-00-0 | Yes  | Yes  | 7.50E-02                                                         | 6.47E-04                                      | 2.83E-03                                      |
| <b>Total HAP</b>              |         |      |      |                                                                  |                                               | <b>2.91E-03</b>                               |
| <b>Maximum Individual HAP</b> |         |      |      |                                                                  |                                               | <b>2.83E-03</b>                               |

<sup>1</sup> Uncontrolled emission factors for natural gas combustion from AP-42, Section 1.4 - Natural Gas Combustion, Table 1.4-1, 1.4-2, 1.4-3, and 1.4-4. Pollutants with an emission factor rating of C, D, or E are not included.



**Table C-5a. RCO Burner Operating Parameters**

| Parameter                                | Units |             |
|------------------------------------------|-------|-------------|
| Unit Heat Input                          | 2.2   | MMBtu/hr    |
| Natural Gas Heating Value <sup>1</sup>   | 1,020 | MMBtu/MMscf |
| Annual Operation                         | 8,760 | hr/yr       |
| Potential Annual Fuel Usage <sup>2</sup> | 18.9  | MMscf/yr    |

<sup>1</sup> Natural Gas HHV is the average from the range listed in AP-42, Section 1.4.

<sup>2</sup> Potential Annual Fuel Usage calculated as follows:

Annual Fuel Usage (MMscf/yr) = Heat Input (MMBtu/hr) / Natural Gas HHV (MMBtu/MMscf)  
x Number of Burners x Annual Operation (hr/yr)

**Table C-5b. RCO Potential Emissions - Criteria Pollutants**

| Pollutant                      | Natural Gas Uncontrolled Emission Factor <sup>1</sup> (lb/MMscf) | Maximum Hourly Emissions (lb/hr) | Potential Annual Emissions (tpy) |
|--------------------------------|------------------------------------------------------------------|----------------------------------|----------------------------------|
| Total PM                       | 7.6                                                              | 0.02                             | 0.07                             |
| PM <sub>10</sub>               | 7.6                                                              | 0.02                             | 0.07                             |
| PM <sub>2.5</sub>              | 7.6                                                              | 0.02                             | 0.07                             |
| SO <sub>2</sub>                | 0.6                                                              | 1.29E-03                         | 5.67E-03                         |
| NO <sub>x</sub>                | 100                                                              | 0.22                             | 0.94                             |
| VOC                            | 5.5                                                              | 0.01                             | 0.05                             |
| CO                             | 84                                                               | 0.18                             | 0.79                             |
| CH <sub>4</sub>                | 2.3                                                              | 4.96E-03                         | 0.02                             |
| N <sub>2</sub> O               | 2.2                                                              | 4.75E-03                         | 0.02                             |
| CO <sub>2</sub>                | 120,000                                                          | 259                              | 1134                             |
| CO <sub>2</sub> e <sup>2</sup> | 120,713                                                          | 260                              | 1140                             |

<sup>1</sup> PM is equal to the sum of PM (condensable) and PM (filterable). PM<sub>10</sub> and PM<sub>2.5</sub> are conservatively assumed to be equivalent to PM.

<sup>2</sup> Global warming potential (GWP) for CH<sub>4</sub> is 25 and N<sub>2</sub>O is 298 for estimating CO<sub>2</sub>e emissions (40 CFR 98, Subpart A, Table A-1, effective January 1, 2014).

**Table C-5c. RCO Potential Emissions - HAP/TAP**

| Pollutant                     | CAS #   | HAP? | TAP? | Natural Gas Uncontrolled Emission Factor <sup>1</sup> (lb/MMscf) | Maximum Hourly Emissions <sup>2</sup> (lb/hr) | Potential Annual Emissions <sup>2</sup> (tpy) |
|-------------------------------|---------|------|------|------------------------------------------------------------------|-----------------------------------------------|-----------------------------------------------|
| Benzene                       | 71-43-2 | Yes  | Yes  | 2.10E-03                                                         | 4.53E-06                                      | 1.98E-05                                      |
| Formaldehyde                  | 50-00-0 | Yes  | Yes  | 7.50E-02                                                         | 1.62E-04                                      | 7.09E-04                                      |
| <b>Total HAP</b>              |         |      |      |                                                                  |                                               | <b>7.28E-04</b>                               |
| <b>Maximum Individual HAP</b> |         |      |      |                                                                  |                                               | <b>7.09E-04</b>                               |

<sup>1</sup> Uncontrolled emission factors for natural gas combustion from AP-42, Section 1.4 - Natural Gas Combustion, Table 1.4-1, 1.4-2, 1.4-3, and 1.4-4. Pollutants with an emission factor rating of C, D, or E are not included.

**Table C-6a. Hammermill Potential Emissions - VOC**

|       |                  |                | Potential Hourly Throughput (ODT/hr) | Potential Annual Throughput (ODT/yr) | Controlled VOC Emission Factor <sup>1</sup> (lb/ODT) | Potential Controlled VOC Emissions <sup>2</sup> (tpy) |
|-------|------------------|----------------|--------------------------------------|--------------------------------------|------------------------------------------------------|-------------------------------------------------------|
| EU ID | Emission Unit    | Control Device |                                      |                                      |                                                      |                                                       |
| HM1   | Hammermill No. 1 | RCO            | 82.67                                | 496,040                              | 7.09E-02                                             | 17.57                                                 |
| HM2   | Hammermill No. 2 |                |                                      |                                      |                                                      |                                                       |
| HM3   | Hammermill No. 3 |                |                                      |                                      |                                                      |                                                       |
| HM4   | Hammermill No. 4 |                |                                      |                                      |                                                      |                                                       |
|       |                  |                | Total Emissions                      |                                      |                                                      | 17.57                                                 |

<sup>1</sup> The hammermill VOC emission factor is the average value from 2013/2014 engineering testing performed on the Dry Classisizer units at the Pinnacle Aliceville facility (formerly Westervelt Aliceville). A 25% safety factor has been included for conservatism.

<sup>2</sup> Potential Emissions (tpy) = Emission Factor (lb/short ton) x Potential Annual Throughput (tpy) / 2000 (lb/short ton)

**Table C-6b. Hammermill Potential Emissions - PM**

| EU ID           | Emission Unit    | Control Device | Potential Operation <sup>1</sup> | Exit Temperature | Exhaust Flow Rate <sup>2</sup> |        | Loading Rate <sup>3</sup> | Total PM <sup>4</sup> |       | Total PM <sub>10</sub> <sup>4,5</sup> |       | Total PM <sub>2.5</sub> <sup>4,5</sup> |       |
|-----------------|------------------|----------------|----------------------------------|------------------|--------------------------------|--------|---------------------------|-----------------------|-------|---------------------------------------|-------|----------------------------------------|-------|
|                 |                  |                | (hr/yr)                          | (°F)             | (acfm)                         | (scfm) | (gr./dscf)                | (lb/hr)               | (tpy) | (lb/hr)                               | (tpy) | (lb/hr)                                | (tpy) |
| HM1             | Hammermill No. 1 | Baghouse       | 8,760                            | 122              | 44,200                         | 40,074 | 0.005                     | 1.72                  | 7.52  | 1.72                                  | 7.52  | 1.72                                   | 7.52  |
| HM2             | Hammermill No. 2 |                |                                  |                  |                                |        |                           |                       |       |                                       |       |                                        |       |
| HM3             | Hammermill No. 3 |                |                                  |                  |                                |        |                           |                       |       |                                       |       |                                        |       |
| HM4             | Hammermill No. 4 |                |                                  |                  |                                |        |                           |                       |       |                                       |       |                                        |       |
| Total Emissions |                  |                |                                  |                  |                                |        |                           | 1.72                  | 7.52  | 1.72                                  | 7.52  | 1.72                                   | 7.52  |

<sup>1</sup> Potential operation assumed to be continuous.

<sup>2</sup> Exhaust flow rate (scfm) estimated for all hammermills. Exhaust flow converted to acfm assuming 50°C exhaust temperatures at 1 atm, with standard temperature of 68 °F.

<sup>3</sup> The grain loading rate is based on the BACT determination for dust collectors.

<sup>4</sup> Emissions of PM and PM<sub>10</sub> are assumed to be equal to emissions of PM<sub>2.5</sub>. These emissions are included as a conservative measure, as all of the particulate matter emitted is expected to be less than 2.5 microns.

<sup>5</sup> Potential hourly PM emissions (lb/hr) = Exhaust Grain Loading Rate (gr./dscf) x Exhaust Air Flow Rate (dscf/min) x (60 min/hr) x (lb/7,000 gr.)

**Table C-6c. Hammermill Potential Emissions - HAP/TAP**

| <b>Pollutant</b>              | <b>CAS #</b> | <b>HAP?</b> | <b>TAP?</b> | <b>ABE Stack Test Factors<sup>1</sup> (lb/ODT)</b> | <b>Maximum Hourly Emissions (lb/hr)</b> | <b>Potential Annual Emissions (tpy)</b> |
|-------------------------------|--------------|-------------|-------------|----------------------------------------------------|-----------------------------------------|-----------------------------------------|
| Acetaldehyde                  | 75-07-0      | Yes         | Yes         | 2.18E-03                                           | 1.80E-01                                | 5.41E-01                                |
| Acrolein                      | 107-02-8     | Yes         | Yes         | 8.18E-04                                           | 6.76E-02                                | 2.03E-01                                |
| Formaldehyde                  | 50-00-0      | Yes         | Yes         | 2.09E-03                                           | 1.73E-01                                | 5.18E-01                                |
| Hydrochloric Acid             | 7647-01-0    | Yes         | Yes         | 4.54E-04                                           | 3.76E-02                                | 1.13E-01                                |
| Methanol                      | 67-56-1      | Yes         | Yes         | 2.42E-02                                           | 2.00E+00                                | 5.99E+00                                |
| Phenol                        | 108-95-2     | Yes         | Yes         | 1.31E-02                                           | 1.08E+00                                | 3.24E+00                                |
| Propionaldehyde               | 123-38-6     | Yes         | Yes         | 2.00E-03                                           | 1.65E-01                                | 4.96E-01                                |
| <b>Total HAP</b>              |              |             |             |                                                    |                                         | <b>11.11</b>                            |
| <b>Maximum Individual HAP</b> |              |             |             |                                                    |                                         | <b>5.99</b>                             |

<sup>1</sup> Emission factors obtained from the Drax facility in Gloster, MS (ABE) stack testing. Maximum emission factors in lbs/ODT obtained from 2018 and 2021 stack testing. The ABE facility routes emissions from both the hammermill and pelletizer to the RCO similar to the proposed Longview facility. The emission factors are divided by 2 to represent half of the RCO emissions for each piece of equipment. A 25% safety factor has been included for conservatism.

Table C-7a. Pelletizing Potential Emissions - VOC

| EU ID           | Emission Unit     | Control Device | Potential Hourly Pellet Throughput (ODT/hr) | Potential Annual Pellet Throughput (ODT/yr) | Controlled VOC Emission Factor <sup>1</sup> (lb/ODT) | Potential Controlled VOC Emissions <sup>2</sup> (tpy) |
|-----------------|-------------------|----------------|---------------------------------------------|---------------------------------------------|------------------------------------------------------|-------------------------------------------------------|
| PC1             | Pelletizer No. 1  | RCO            | 82.45                                       | 496,040                                     | 7.09E-02                                             | 17.57                                                 |
| PC2             | Pelletizer No. 2  |                |                                             |                                             |                                                      |                                                       |
| PC3             | Pelletizer No. 3  |                |                                             |                                             |                                                      |                                                       |
| PC4             | Pelletizer No. 4  |                |                                             |                                             |                                                      |                                                       |
| PC5             | Pelletizer No. 5  |                |                                             |                                             |                                                      |                                                       |
| PC6             | Pelletizer No. 6  |                |                                             |                                             |                                                      |                                                       |
| PC7             | Pelletizer No. 7  |                |                                             |                                             |                                                      |                                                       |
| PC8             | Pelletizer No. 8  |                |                                             |                                             |                                                      |                                                       |
| PC9             | Pelletizer No. 9  |                |                                             |                                             |                                                      |                                                       |
| PC10            | Pelletizer No. 10 |                |                                             |                                             |                                                      |                                                       |
| PC11            | Pelletizer No. 11 |                |                                             |                                             |                                                      |                                                       |
| Total Emissions |                   |                |                                             |                                             |                                                      | 17.57                                                 |

<sup>1</sup> The pellet cooler VOC emission factor is the average value from 2013/2014 engineering testing performed on the Dry Classsizer units at the Pinnacle Aliceville facility (formerly Westervelt Aliceville). A 25% safety factor has been included for conservatism.

<sup>2</sup> Potential Emissions (tpy) = Emission Factor (lb/short ton) x Potential Annual Throughput (tpy) / 2000 (lb/short ton)

Table C-7b. Pelletizing Potential Emissions - PM

| EU ID           | Emission Unit     | Control Device | Potential Operation <sup>1</sup> | Exit Temperature | Exhaust Flow Rate <sup>2</sup> |        | Loading Rate <sup>3</sup> | Total PM <sup>4,5</sup> |       | Total PM <sub>10</sub> <sup>4,5</sup> |       | Total PM <sub>2.5</sub> <sup>4,5</sup> |       |
|-----------------|-------------------|----------------|----------------------------------|------------------|--------------------------------|--------|---------------------------|-------------------------|-------|---------------------------------------|-------|----------------------------------------|-------|
|                 |                   |                | (hr/yr)                          | (°F)             | (acfm)                         | (scfm) |                           | (lb/hr)                 | (tpy) | (lb/hr)                               | (tpy) | (lb/hr)                                | (tpy) |
| PC1             | Pelletizer No. 1  | Baghouse       | 8,760                            | 122              | 76,000                         | 68,905 | 0.005                     | 2.95                    | 12.93 | 2.95                                  | 12.93 | 2.95                                   | 12.93 |
| PC2             | Pelletizer No. 2  |                |                                  |                  |                                |        |                           |                         |       |                                       |       |                                        |       |
| PC3             | Pelletizer No. 3  |                |                                  |                  |                                |        |                           |                         |       |                                       |       |                                        |       |
| PC4             | Pelletizer No. 4  |                |                                  |                  |                                |        |                           |                         |       |                                       |       |                                        |       |
| PC5             | Pelletizer No. 5  |                |                                  |                  |                                |        |                           |                         |       |                                       |       |                                        |       |
| PC6             | Pelletizer No. 6  |                |                                  |                  |                                |        |                           |                         |       |                                       |       |                                        |       |
| PC7             | Pelletizer No. 7  |                |                                  |                  |                                |        |                           |                         |       |                                       |       |                                        |       |
| PC8             | Pelletizer No. 8  |                |                                  |                  |                                |        |                           |                         |       |                                       |       |                                        |       |
| PC9             | Pelletizer No. 9  |                |                                  |                  |                                |        |                           |                         |       |                                       |       |                                        |       |
| PC10            | Pelletizer No. 10 |                |                                  |                  |                                |        |                           |                         |       |                                       |       |                                        |       |
| PC11            | Pelletizer No. 11 |                |                                  |                  |                                |        |                           |                         |       |                                       |       |                                        |       |
| Total Emissions |                   |                |                                  |                  |                                |        |                           | 2.95                    | 12.93 | 2.95                                  | 12.93 | 2.95                                   | 12.93 |

<sup>1</sup> Potential operation assumed to be continuous.

<sup>2</sup> Exhaust flow rate (scfm) estimated for all pellet coolers. Exhaust flow converted to acfm assuming 50°C exhaust temperatures at 1 atm, with standard temperature of 68 °F.

<sup>3</sup> The grain loading rate is based on the BACT determination for dust collectors.

<sup>4</sup> Emissions of PM and PM<sub>10</sub> are assumed to be equal to emissions of PM<sub>2.5</sub>. These emissions are included as a conservative measure, as all of the particulate matter emitted is expected to be less than 2.5 microns.

<sup>5</sup> Potential hourly PM emissions (lb/hr) = Exhaust Grain Loading Rate (gr./dscf) x Exhaust Air Flow Rate (dscf/min) x (60 min/hr) x (lb/7,000 gr.)

Table C-7c. Hammermill Potential Emissions - HAP/TAP

| Pollutant              | CAS #     | HAP? | TAP? | ABE Stack Test Factors <sup>1</sup><br>(lb/ODT) | Maximum Hourly Emissions<br>(lb/hr) | Potential Annual Emissions<br>(tpy) |
|------------------------|-----------|------|------|-------------------------------------------------|-------------------------------------|-------------------------------------|
| Acetaldehyde           | 75-07-0   | Yes  | Yes  | 2.18E-03                                        | 1.80E-01                            | 5.41E-01                            |
| Acrolein               | 107-02-8  | Yes  | Yes  | 8.18E-04                                        | 6.74E-02                            | 2.03E-01                            |
| Formaldehyde           | 50-00-0   | Yes  | Yes  | 2.09E-03                                        | 1.72E-01                            | 5.18E-01                            |
| Hydrochloric Acid      | 7647-01-0 | Yes  | Yes  | 4.54E-04                                        | 3.75E-02                            | 1.13E-01                            |
| Methanol               | 67-56-1   | Yes  | Yes  | 2.42E-02                                        | 1.99E+00                            | 5.99E+00                            |
| Phenol                 | 108-95-2  | Yes  | Yes  | 1.31E-02                                        | 1.08E+00                            | 3.24E+00                            |
| Propionaldehyde        | 123-38-6  | Yes  | Yes  | 2.00E-03                                        | 1.65E-01                            | 4.96E-01                            |
| Total HAP              |           |      |      |                                                 |                                     | 11.11                               |
| Maximum Individual HAP |           |      |      |                                                 |                                     | 5.99                                |

<sup>1</sup> Emission factors obtained from the Drax facility in Gloster, MS (ABE) stack testing. Maximum emission factors in lbs/ODT obtained from 2018 and 2021 stack testing. The ABE facility routes emissions from both the hammermill and pelletizer to the RCO similar to the proposed Longview facility. The emission factors are divided by 2 to represent half of the RCO emissions for each piece of equipment. A 25% safety factor has been included for conservatism.

**Table C-8. Miscellaneous Sources Potential Emissions - PM**

| EU ID | Emission Unit <sup>1</sup> | Potential Annual Throughput (ODT/yr) | Emission Factor <sup>2,3</sup> |                           |                            | Potential Emissions |                        |                         |
|-------|----------------------------|--------------------------------------|--------------------------------|---------------------------|----------------------------|---------------------|------------------------|-------------------------|
|       |                            |                                      | PM (lb/ton)                    | PM <sub>10</sub> (lb/ton) | PM <sub>2.5</sub> (lb/ton) | PM (tpy)            | PM <sub>10</sub> (tpy) | PM <sub>2.5</sub> (tpy) |
| BIO   | Biosizer/Scalper           | 496,040                              | 1.1E-05                        | 5.1E-06                   | 7.8E-07                    | 5.37E-03            | 2.54E-03               | 3.85E-04                |
| DCS   | Dry Chip Storage Tent      | 496,040                              | 2.1E-04                        | 1.0E-04                   | 1.5E-05                    | 5.56E-02            | 2.63E-02               | 3.98E-03                |
| PSS1  | Pellet Storage Silo 1      | 248,020                              | 2.7E-04                        | 1.3E-04                   | 1.9E-05                    | 3.55E-02            | 1.68E-02               | 2.54E-03                |
| PSS2  | Pellet Storage Silo 2      | 248,020                              | 2.7E-04                        | 1.3E-04                   | 1.9E-05                    | 3.55E-02            | 1.68E-02               | 2.54E-03                |
| SLS   | Ship Loadout System        | 496,040                              | 2.7E-04                        | 1.3E-04                   | 1.9E-05                    | 7.10E-02            | 3.35E-02               | 5.07E-03                |

<sup>1</sup> Total throughput at the facility is quantified in ODT/yr. To represent as-processed throughput weight, the value is adjusted based on moisture content specific to the process associated with the emission unit. All throughput will either go through the biosizer or a scalper so emissions from these process units are only quantified once.

<sup>2</sup> Emissions calculated using emission factor determined according to AP-42 Section 13.2.4 for aggregate handling and storage piles.

$$E \text{ (lb/ton)} = k (0.0032) \times (U/5)^{1.3} / (M/2)^{1.4}$$

0.74 = k, PM size multiplier

0.35 = k, PM<sub>10</sub> size multiplier

0.053 = k, PM<sub>2.5</sub> size multiplier

2.54 = U, mean wind speed (m/s) (average from 2007-2015) in Longview

50 = M, estimate for moisture content (%) of incoming material as described in manufacturer's proposal for RTO operation

6 = M, estimate for moisture content (%) of dry chips

5 = M, estimate for moisture content (%) of dry, finished product

<sup>3</sup> The VOC emission factor for chip storage in EPA AP-42 10.6.3, Table 10.6.3-7 is listed as "no data available"; therefore emissions are not quantified.

Table C-9. Paved Road Potential Emissions - PM

|                                                        | PM Emission<br>Factor, E <sup>1</sup><br>(lb/VMT) | PM <sub>10</sub> Emission Factor,<br>E <sup>1</sup><br>(lb/VMT) | PM <sub>2.5</sub> Emission<br>Factor, E <sup>1</sup><br>(lb/VMT) | Maximum<br>Loads Per Hour<br><sup>2</sup> | Maximum Loads<br>Per Year <sup>2</sup> | Truck Route<br>Maximum Round<br>Trip Distance<br>(mi) | Vehicle Miles<br>Traveled per<br>Hour<br>(VMT/hr) | Vehicle Miles<br>Traveled per<br>Year<br>(VMT/yr) | PM<br>Emissions <sup>3</sup><br>(tpy) | PM <sub>10</sub><br>Emissions <sup>3</sup><br>(tpy) | PM <sub>2.5</sub><br>Emissions <sup>3</sup><br>(tpy) |
|--------------------------------------------------------|---------------------------------------------------|-----------------------------------------------------------------|------------------------------------------------------------------|-------------------------------------------|----------------------------------------|-------------------------------------------------------|---------------------------------------------------|---------------------------------------------------|---------------------------------------|-----------------------------------------------------|------------------------------------------------------|
| Paved Truck Route                                      |                                                   |                                                                 |                                                                  |                                           |                                        |                                                       |                                                   |                                                   |                                       |                                                     |                                                      |
| Between wet material stockpiles and process drop point | 0.25                                              | 0.049                                                           | 0.012                                                            | 24.8                                      | 180,000                                | 0.124                                                 | 3.1                                               | 22,369                                            | 2.39                                  | 0.48                                                | 0.12                                                 |

<sup>1</sup> Emission factor E is calculated according to AP-42 Section 13.2.1 for emissions from paved roads, equation 1:  
$$E \text{ (lbs/VMT)} = \text{Paved Road Emission Factor, } [k * (sL)^{0.91} * (W)^{1.02}]$$
  
0.011 = k, PM size multiplier (lb/VMT) from AP-42 Table 13.2.1-1.  
0.0022 = k, PM<sub>10</sub> size multiplier (lb/VMT) from AP-42 Table 13.2.1-1.  
0.00054 = k, PM<sub>2.5</sub> size multiplier (lb/VMT) from AP-42 Table 13.2.1-1.

1.1 = sL, roadway surface silt loading (g/m<sup>2</sup>) AP-42 13.2.1, Table 13-2.1-3. The silt loading value for corn wet mills is used because the wet material stockpile is expected to store materials with a similar texture and moisture content.  
19.26 = W, average truck weight (tons)

<sup>2</sup> Vehicles per hour and vehicles per year are based on truck capacity and pile throughput values:  
Truck Capacity: 5.51 tons  
Max Hourly Throughput: 137 tons/hr  
Max Annual Throughput: 992,080 tons/yr

<sup>3</sup> Emissions account for natural mitigation due to precipitation according to AP-42 Section 13.2.1 equation 2:  
$$\text{Annual emissions (tpy)} = E * (1-P/4N) * [\text{VMT/yr}] / [\text{lb/ton}]$$
  
185.8 = P, mean number of days per year with measurable precipitation for Longview station, NOAA National Centers for Environmental Information 1981-2010 Climate Normals data  
365 = N, number of days in period for annual rainfall mitigation effect

<sup>4</sup> Truck weight and vehicle capacity were provided to by Drax to Trinity via email on March 6, 2020.  
Truck Weight: 33000 lb  
Vehicle Capacity: 5 ODMT

**Table C-10a. Material Handling Potential Emissions - PM**

| Pile                    | Throughput <sup>1</sup> |           | PM Emissions <sup>2</sup> |          | PM <sub>10</sub> Emissions <sup>2</sup> |          | PM <sub>2.5</sub> Emissions <sup>2</sup> |          |
|-------------------------|-------------------------|-----------|---------------------------|----------|-----------------------------------------|----------|------------------------------------------|----------|
|                         | (tons/hr)               | (tons/yr) | (lb/hr)                   | (tpy)    | (lb/hr)                                 | (tpy)    | (lb/hr)                                  | (tpy)    |
| Wet Material Stockpiles | 137                     | 992,080   | 1.48E-03                  | 5.37E-03 | 7.00E-04                                | 2.54E-03 | 1.06E-04                                 | 3.85E-04 |

<sup>1</sup> Maximum pile throughput is based on a total pellet production rate of 62 metric tonnes per hour and 450,000 metric tonnes per year, scaled by a factor of 2 to account for the additional weight of the material being stored wet.

<sup>2</sup> Emissions calculated using emission factor determined according to AP-42 Section 13.2.4 for aggregate handling and storage piles.

$$E \text{ (lb/VMT)} = k (0.0032) \times (U/5)^{1.3} / (M/2)^{1.4}$$

0.74 = k, PM size multiplier

0.35 = k, PM<sub>10</sub> size multiplier

0.053 = k, PM<sub>2.5</sub> size multiplier

2.54 = U, mean wind speed (m/s) (average from 2007-2015) in Longview

50 = M, estimate for moisture content (%) of incoming material as described in manufacturer's proposal for RTO operation

**Table C-10b. Pile Wind Erosion Potential Emissions - PM**

| Pile                    | Area <sup>1</sup> | PM Emissions <sup>2</sup> |       | PM <sub>10</sub> Emissions <sup>3</sup> |       | PM <sub>2.5</sub> Emissions <sup>3</sup> |       |
|-------------------------|-------------------|---------------------------|-------|-----------------------------------------|-------|------------------------------------------|-------|
|                         | (acres)           | (lb/hr)                   | (tpy) | (lb/hr)                                 | (tpy) | (lb/hr)                                  | (tpy) |
| Wet Material Stockpiles | 2.52              | 0.08                      | 0.37  | 0.040                                   | 0.18  | 0.0061                                   | 0.027 |

<sup>1</sup> The wet material stockpiles are located on the north side of the facility in a conical shape. There will be two wet fiber storage piles and one hog storage pile. The three piles are expected to have similar dimensions. The pile diameters and heights were provided by Drax in a call on 3/7/2022.

<sup>2</sup> PM Emissions are calculated using emission factors determined according to Equation 2-12 from the EPA document "Fugitive Dust Background Document and Technical Information Document for Best Available Control Measures" dated 9/1992.

$$e_{TSP} \text{ (lb/acre-day)} = 1.7 \times (s/1.5) \times [(365-p) / 235] \times (f/15)$$

1 = s, silt content

185.8 = p, number of days with  $\geq 0.01$  in. precipitation per year

14.01 = f, percentage of time that the unobstructed wind speed exceeds 5.4 m/s (12 mph) at the mean pile height

<sup>3</sup> PM<sub>10</sub> and PM<sub>2.5</sub> emissions are determined based on PM emissions using the ratios of the particle size multipliers for each particle size provided for Equation 1 in AP-42 Section 13.2.4.



Table C-12. Truck Tipping Potential Emissions - PM

| EU ID           | Emission Unit | Control Device | Potential Operation <sup>1</sup><br>(hr/yr) | Exit Temperature<br>(°F) | Exhaust Flow Rate <sup>2</sup> |        | Loading Rate <sup>3</sup><br>(gr./dscf) | Total PM <sup>4</sup> |       | Total PM <sub>10</sub> <sup>4,5</sup> |       | Total PM <sub>2.5</sub> <sup>4,5</sup> |       |
|-----------------|---------------|----------------|---------------------------------------------|--------------------------|--------------------------------|--------|-----------------------------------------|-----------------------|-------|---------------------------------------|-------|----------------------------------------|-------|
|                 |               |                |                                             |                          | (acfm)                         | (scfm) |                                         | (lb/hr)               | (tpy) | (lb/hr)                               | (tpy) | (lb/hr)                                | (tpy) |
| BAG2            | Truck Tipper  | Baghouse       | 8,760                                       | 150                      | 27,700                         | 23,961 | 0.002                                   | 0.41                  | 1.80  | 0.41                                  | 1.80  | 0.41                                   | 1.80  |
| Total Emissions |               |                |                                             |                          |                                |        |                                         | 0.41                  | 1.80  | 0.41                                  | 1.80  | 0.41                                   | 1.80  |

<sup>1</sup> Potential operation assumed to be continuous.

<sup>2</sup> Exhaust flow converted to scfm assuming 150°F exhaust temperatures at 1 atm, with standard temperature of 68°F.

<sup>3</sup> Exit temperature, exhaust flow rate, and loading rate obtained from vendor guarantee.

<sup>4</sup> Emissions of PM and PM<sub>10</sub> are assumed to be equal to emissions of PM<sub>2.5</sub>. These emissions are included as a conservative measure, as all of the particulate matter emitted is expected to be less than 2.5 microns.

<sup>5</sup> Potential hourly PM emissions (lb/hr) = Exhaust Grain Loading Rate (gr/dscf) x Exhaust Air Flow Rate (dscf/min) x (60 min/hr) x (lb/7,000 gr.)

**Table C-11a. ULSD-Fired Emergency Engines Operating Parameters**

| EU ID | Emission Unit              | Potential Operation | Rated Engine Capacity |       |
|-------|----------------------------|---------------------|-----------------------|-------|
|       |                            | (hr/yr)             | (bhp)                 | (bkw) |
| ENG1  | 625 kW Emergency Generator | 125                 | 838                   | 625   |
| FWP1  | 164 kW Fire Pump Engine    | 125                 | 220                   | 164   |

**Table C-11b. ULSD-Fired Emergency Engines Potential Emissions - Criteria Pollutants**

| Pollutant                      | Diesel Industrial Engines<br>AP-42         | Large Stationary Diesel<br>Engines AP-42   | FWP1 Emissions <sup>2,3,4</sup> |          | ENG1 Emissions <sup>2,3,4</sup> |          |
|--------------------------------|--------------------------------------------|--------------------------------------------|---------------------------------|----------|---------------------------------|----------|
|                                | Emission Factor <sup>1</sup><br>(lb/MMBtu) | Emission Factor <sup>1</sup><br>(lb/MMBtu) | (lb/hr)                         | (tpy)    | (lb/hr)                         | (tpy)    |
| Total PM                       | --                                         | --                                         | 7.23E-03                        | 4.52E-04 | 0.03                            | 1.72E-03 |
| Total PM <sub>10</sub>         | --                                         | --                                         | 7.23E-03                        | 4.52E-04 | 0.03                            | 1.72E-03 |
| Total PM <sub>2.5</sub>        | --                                         | --                                         | 7.23E-03                        | 4.52E-04 | 0.03                            | 1.72E-03 |
| SO <sub>2</sub>                | 0.29                                       | 1.52E-03                                   | 0.45                            | 0.03     | 0.01                            | 5.55E-04 |
| NO <sub>x</sub>                | 4.41                                       | 3.20                                       | 6.79                            | 0.42     | 18.77                           | 1.17     |
| VOC                            | 0.36                                       | 0.09                                       | 0.55                            | 0.03     | 0.53                            | 0.03     |
| CO                             | 0.95                                       | 0.85                                       | 1.46                            | 0.09     | 4.99                            | 0.31     |
| CO <sub>2</sub> e <sup>5</sup> | 165.20                                     | 165.60                                     | 254.41                          | 15.90    | 971.39                          | 60.71    |

<sup>1</sup> Emission factors for diesel industrial engines from AP-42, Table 3.3-1. Emission factors for large stationary diesel engines from AP-42, Table 3.4-1 and Table 3.4-2. HAP/TAP Pollutants with an emission factor rating of C, D, or E are not included.

<sup>2</sup> PM emissions for both units are estimated using Tier II EPA standards (0.20 g/kW-hr) for nonroad compression-ignition engines. Factors are given in units of g/kW-hr and are converted to lb/hr.

<sup>3</sup> An example of annual emissions calculations are shown below:

$$\text{Emission Factor (lb/MMBtu)} \times \text{Fuel Factor (MMBtu/bhp-hr)} \times \text{Rated Capacity (bhp)} \times \text{Annual Operation (hr/yr)} / 2,000 \text{ (lb/ton)}$$

$$\text{Fuel Factor (MMBtu/bhp-hr)} = 0.007$$

<sup>4</sup> Diesel particulate filters will be added to each emergency engine and will provide the following control efficiency for particulate matter: 90%

<sup>5</sup> CO<sub>2</sub> and CH<sub>4</sub> emission factors are from AP-42, Table 3.3-1. N<sub>2</sub>O emission factor is from 40 CFR 98, Subpart C, Table C-2. Global warming potential (GWP) for CH<sub>4</sub> is 25 and N<sub>2</sub>O is 298 for estimating CO<sub>2</sub>e emissions (40 CFR 98, Subpart A, Table A-1).

**Table C-13a. Biomass Rotary Dryer Abort Parameters**

| Parameter                                          | Value | Units     |
|----------------------------------------------------|-------|-----------|
| Max Hourly Throughput                              | 68.3  | ODT/hr    |
| Maximum Heat Input <sup>1</sup>                    | 187.7 | MMBtu/hr  |
| Wood and Wood Residuals Heating Value <sup>2</sup> | 17.48 | MMBtu/ODT |
| Maximum Annual Operation                           | 50    | hr/yr     |

<sup>1</sup> Dryer abort heat input is assumed to be 100% of the maximum heat input for the unit.

<sup>2</sup> Wood and wood residuals heating value provided in 40 CFR Appendix Table C-1 to Subpart C of Part 98.

**Table C-13b. Biomass Rotary Dryer Abort Potential Emissions - Criteria Pollutants**

| Pollutant                    | Maximum Hourly Emissions <sup>1</sup><br>(lb/hr) | Potential Annual Emissions<br>(tpy) |
|------------------------------|--------------------------------------------------|-------------------------------------|
| PM                           | 100.00                                           | 2.50                                |
| PM <sub>10</sub>             | 100.00                                           | 2.50                                |
| PM <sub>2.5</sub>            | 100.00                                           | 2.50                                |
| SO <sub>2</sub> <sup>2</sup> | 4.69                                             | 0.12                                |
| NO <sub>x</sub>              | 52.00                                            | 1.30                                |
| VOC                          | 300.00                                           | 7.50                                |
| CO                           | 42.00                                            | 1.05                                |

<sup>1</sup> Hourly emission rates from the RTO stack are obtained from vendor guarantees provided by TSI on September 9th, 2022. Uncontrolled emissions for PM and VOC are backcalculated using the control efficiencies of the WESP and RTO provided by TSI.

WESP PM control efficiency: 95%

RTO VOC control efficiency: 95%

<sup>2</sup> SO<sub>2</sub> emissions estimated using AP-42 Table 1.6-2 for Wood Residue Combustion. Emission factor is given in lb/MMBtu and converted to lbs/hr using the maximum heat input of the furnace.

**Table C-13c. Biomass Rotary Dryer Abort Potential Emissions - GHG**

| Fuel                  | Wood Drying CO <sub>2</sub><br>Emission Factor <sup>1</sup><br>(lb/ODT) | CO <sub>2</sub><br>Emissions<br>(tpy) |
|-----------------------|-------------------------------------------------------------------------|---------------------------------------|
| Wood & wood residuals | 720                                                                     | 1,230                                 |

<sup>1</sup> Wood drying emission factors for CO<sub>2</sub> are from AP-42 Table 10.6.1-2.

Table C-13d. Biomass Rotary Dryer Abort Potential Emissions - HAP/TAP

| Pollutant                                                     | CAS #      | HAP?      | TAP? | Biomass Combustion Emission Factor <sup>1</sup> (lb/MMBtu) | ABE Stack Test Factors <sup>2</sup> (lb/ODT) | Maximum Hourly Emissions (lb/hr) | Potential Annual Emissions (tpy) |
|---------------------------------------------------------------|------------|-----------|------|------------------------------------------------------------|----------------------------------------------|----------------------------------|----------------------------------|
| Acenaphthene                                                  | 83-32-9    | Yes - PAH | No   | 9.10E-07                                                   | --                                           | 1.71E-04                         | 4.27E-06                         |
| Acenaphthylene                                                | 208-96-8   | Yes - PAH | No   | 5.00E-06                                                   | --                                           | 9.39E-04                         | 2.35E-05                         |
| Acetaldehyde                                                  | 75-07-0    | Yes       | Yes  | 8.30E-04                                                   | 1.66E-01                                     | 1.13E+01                         | 2.83E-01                         |
| Acrolein                                                      | 107-02-8   | Yes       | Yes  | --                                                         | 7.11E-02                                     | 4.86E+00                         | 1.21E-01                         |
| Anthracene                                                    | 120-12-7   | Yes - PAH | No   | 3.00E-06                                                   | --                                           | 5.63E-04                         | 1.41E-05                         |
| Benzo(a)anthracene                                            | 56-55-3    | Yes - PAH | Yes  | 6.50E-08                                                   | --                                           | 1.22E-05                         | 3.05E-07                         |
| Benzene                                                       | 71-43-2    | Yes       | Yes  | 4.20E-03                                                   | --                                           | 7.88E-01                         | 1.97E-02                         |
| Benzo(a)pyrene                                                | 50-32-8    | Yes - PAH | Yes  | 2.60E-06                                                   | --                                           | 4.88E-04                         | 1.22E-05                         |
| Benzo(b)fluoranthene                                          | 205-99-2   | Yes - PAH | Yes  | 1.00E-07                                                   | --                                           | 1.88E-05                         | 4.69E-07                         |
| Benzo(g,h,i)perylene                                          | 191-24-2   | Yes - PAH | No   | 9.30E-08                                                   | --                                           | 1.75E-05                         | 4.36E-07                         |
| Benzo(k)fluoranthene                                          | 207-08-9   | Yes - PAH | Yes  | 3.60E-08                                                   | --                                           | 6.76E-06                         | 1.69E-07                         |
| Chrysene                                                      | 218-01-9   | Yes - PAH | No   | 3.80E-08                                                   | --                                           | 7.13E-06                         | 1.78E-07                         |
| Dibenzo(a,h)anthracene                                        | 53-70-3    | Yes - PAH | Yes  | 9.10E-09                                                   | --                                           | 1.71E-06                         | 4.27E-08                         |
| Fluoranthene                                                  | 206-44-0   | Yes - PAH | No   | 1.60E-06                                                   | --                                           | 3.00E-04                         | 7.51E-06                         |
| Fluorene                                                      | 86-73-7    | Yes - PAH | No   | 3.40E-06                                                   | --                                           | 6.38E-04                         | 1.60E-05                         |
| Formaldehyde                                                  | 50-00-0    | Yes       | Yes  | 4.40E-03                                                   | 4.17E-01                                     | 2.85E+01                         | 7.13E-01                         |
| Hydrochloric Acid                                             | 7647-01-0  | Yes       | Yes  | --                                                         | 5.21E-02                                     | 3.56E+00                         | 8.91E-02                         |
| Indeno(1,2,3,c,d)pyrene                                       | 193-39-5   | Yes - PAH | Yes  | 8.70E-08                                                   | --                                           | 1.63E-05                         | 4.08E-07                         |
| Methanol                                                      | 67-56-1    | Yes       | Yes  | --                                                         | 7.49E-01                                     | 5.12E+01                         | 1.28E+00                         |
| Naphthalene                                                   | 91-20-3    | Yes - PAH | Yes  | 9.70E-05                                                   | --                                           | 1.82E-02                         | 4.55E-04                         |
| Octachlorodibenzo-p-dioxins (2,3,7,8 TCDD Eqv.) <sup>3</sup>  | 3268-87-9  | No        | No   | 6.60E-08                                                   | --                                           | 3.72E-09                         | 9.29E-11                         |
| Pentachlorodibenzo-p-dioxins (2,3,7,8 TCDD Eqv.) <sup>3</sup> | 40321-76-4 | No        | No   | 1.50E-09                                                   | --                                           | 2.82E-07                         | 7.04E-09                         |
| Phenanthrene                                                  | 85-01-8    | Yes - PAH | No   | 7.00E-06                                                   | --                                           | 1.31E-03                         | 3.28E-05                         |
| Phenol                                                        | 108-95-2   | Yes       | Yes  | --                                                         | 3.22E-01                                     | 2.20E+01                         | 5.51E-01                         |
| Propionaldehyde                                               | 123-38-6   | Yes       | Yes  | --                                                         | 4.74E-02                                     | 3.24E+00                         | 8.10E-02                         |
| Pyrene                                                        | 129-00-0   | Yes - PAH | No   | 3.70E-06                                                   | --                                           | 6.94E-04                         | 1.74E-05                         |
| Arsenic                                                       | 7440-38-2  | Yes       | Yes  | 2.20E-05                                                   | --                                           | 4.13E-03                         | 1.03E-04                         |
| Beryllium                                                     | 7440-41-7  | Yes       | Yes  | 1.10E-06                                                   | --                                           | 2.06E-04                         | 5.16E-06                         |
| Cadmium                                                       | 7440-43-9  | Yes       | Yes  | 4.10E-06                                                   | --                                           | 7.70E-04                         | 1.92E-05                         |
| Chromium, Total                                               | 7440-47-3  | Yes       | Yes  | 2.10E-05                                                   | --                                           | 3.94E-03                         | 9.85E-05                         |
| Chromium, Hexavalent <sup>4</sup>                             | 18540-29-9 | No        | Yes  | 3.50E-06                                                   | --                                           | 6.57E-04                         | 1.64E-05                         |
| Copper                                                        | 7440-50-8  | No        | Yes  | 4.90E-05                                                   | --                                           | 9.20E-03                         | 2.30E-04                         |
| Manganese                                                     | 7439-96-5  | Yes       | Yes  | 1.60E-03                                                   | --                                           | 3.00E-01                         | 7.51E-03                         |
| Mercury                                                       | 7439-97-6  | Yes       | Yes  | 3.50E-06                                                   | --                                           | 6.57E-04                         | 1.64E-05                         |
| Nickel                                                        | 7440-02-0  | Yes       | Yes  | 3.30E-05                                                   | --                                           | 6.19E-03                         | 1.55E-04                         |
| Selenium                                                      | 7782-49-2  | Yes       | Yes  | 2.80E-06                                                   | --                                           | 5.26E-04                         | 1.31E-05                         |
| Zinc                                                          | 7440-66-6  | No        | No   | 4.20E-04                                                   | --                                           | 7.88E-02                         | 1.97E-03                         |
| <b>Total HAP</b>                                              |            |           |      |                                                            |                                              | <b>3.15</b>                      | <b>3.15</b>                      |
| <b>Maximum Individual HAP</b>                                 |            |           |      |                                                            |                                              | <b>1.28</b>                      | <b>1.28</b>                      |

<sup>1</sup> Emission factors for biomass (wood residue) combustion are uncontrolled and from AP-42, Section 1.6 (Wood Residue Combustion), Tables 1.6-3 and 1.6-4. Pollutants with an emission factor rating of C, D, or E are not included.

<sup>2</sup> Emission factors obtained from Drax ABE facility in Gloster, MS stack testing. Maximum emission factors in lbs/ODT from 2018 and 2021 stack testing. A 25% safety factor has been included for conservatism. Uncontrolled TAP emissions in the form of VOC are backcalculated using the control efficiencies of the RTO provided by TSI.

Control efficiency is provided by LDX Solutions for VOC compounds as: 95%

<sup>3</sup> Dioxin and furan emissions apply a toxic equivalency (TEQ) factor obtained from the 72 FR 26545 in accordance with the 1998 TAP rule WAC 173-460-050(4)(b) adopted by SWCAA. Emissions shown in this table are expressed as an equivalent emissions of 2,3,7,8 TCDD. <https://www.govinfo.gov/content/pkg/FR-2007-05-10/pdf/E7-9015.pdf>

Octachlorodibenzo-p-dioxins TEQ: 0.0003

Pentachlorodibenzo-p-dioxins TEQ: 1

<sup>4</sup> Because the emission factor for "Chromium, Total" has an "A" rating and it is likely that a portion is in the form of hexavalent chromium, it conservative to use the emission factor for "Chromium, Hexavalent" even though it has a "C" rating.

**Table C-14a. Biomass Furnace Abort Parameters**

| Parameter                       | Value | Units    |
|---------------------------------|-------|----------|
| Maximum Heat Input <sup>1</sup> | 187.7 | MMBtu/hr |
| Maximum Annual Operation        | 360   | hr/yr    |

<sup>1</sup> Furnace abort heat input is assumed to be 100% of the maximum heat input for the unit.

**Table C-14b. Biomass Furnace Abort Potential Emissions - Criteria Pollutants**

| Pollutant                      | Emission Factors <sup>1</sup><br>(lb/MMBtu) | Maximum Hourly<br>Emissions<br>(lb/hr) | Potential Annual<br>Emissions<br>(tpy) |
|--------------------------------|---------------------------------------------|----------------------------------------|----------------------------------------|
| CO                             | 0.60                                        | 112.62                                 | 20.27                                  |
| NO <sub>x</sub>                | 0.22                                        | 41.29                                  | 7.43                                   |
| VOC                            | 0.02                                        | 3.19                                   | 5.74E-01                               |
| Filterable PM                  | 0.56                                        | 105.11                                 | 18.92                                  |
| Condensable PM                 | 0.02                                        | 3.19                                   | 5.74E-01                               |
| Total PM                       | 0.58                                        | 108.30                                 | 19.49                                  |
| Total PM <sub>10</sub>         | 0.52                                        | 97.04                                  | 17.47                                  |
| Total PM <sub>2.5</sub>        | 0.45                                        | 83.90                                  | 15.10                                  |
| SO <sub>2</sub>                | 0.03                                        | 4.69                                   | 8.45E-01                               |
| Lead                           | 4.80E-05                                    | 9.01E-03                               | 1.62E-03                               |
| CH <sub>4</sub>                | 0.02                                        | 3.94                                   | 7.10E-01                               |
| N <sub>2</sub> O               | 0.01                                        | 2.44                                   | 4.39E-01                               |
| CO <sub>2</sub>                | 195.00                                      | 36,602                                 | 6588.27                                |
| CO <sub>2</sub> e <sup>2</sup> | 199.40                                      | 37,427                                 | 6736.89                                |

<sup>1</sup> Emission factors from AP-42 Section 1.6 (Wood Residue Combustion), Tables 1.6-1 through 1.6-4 (09/03).

<sup>2</sup> Global warming potential (GWP) for CH<sub>4</sub> is 25 and N<sub>2</sub>O is 298 for estimating CO<sub>2</sub>e emissions (40 CFR 98, Subpart A, Table A-1, effective January 1, 2014).

Table C-14c. Biomass Furnace Abort Potential Emissions - HAP/TAP

| Pollutant                                                        | CAS #      | HAP?      | TAP? | Biomass Combustion<br>Emission Factor <sup>1</sup><br>(lb/MMBtu) | Maximum Hourly<br>Emissions<br>(lb/hr) | Potential Annual<br>Emissions<br>(tpy) |
|------------------------------------------------------------------|------------|-----------|------|------------------------------------------------------------------|----------------------------------------|----------------------------------------|
| Acenaphthene                                                     | 83-32-9    | Yes - PAH | No   | 9.10E-07                                                         | 1.71E-04                               | 3.07E-05                               |
| Acenaphthylene                                                   | 208-96-8   | Yes - PAH | No   | 5.00E-06                                                         | 9.39E-04                               | 1.69E-04                               |
| Acetaldehyde                                                     | 75-07-0    | Yes       | Yes  | 8.30E-04                                                         | 1.56E-01                               | 2.80E-02                               |
| Anthracene                                                       | 120-12-7   | Yes - PAH | No   | 3.00E-06                                                         | 5.63E-04                               | 1.01E-04                               |
| Benzo(a)anthracene                                               | 56-55-3    | Yes - PAH | Yes  | 6.50E-08                                                         | 1.22E-05                               | 2.20E-06                               |
| Benzene                                                          | 71-43-2    | Yes       | Yes  | 4.20E-03                                                         | 7.88E-01                               | 1.42E-01                               |
| Benzo(a)pyrene                                                   | 50-32-8    | Yes - PAH | Yes  | 2.60E-06                                                         | 4.88E-04                               | 8.78E-05                               |
| Benzo(b)fluoranthene                                             | 205-99-2   | Yes - PAH | Yes  | 1.00E-07                                                         | 1.88E-05                               | 3.38E-06                               |
| Benzo(g,h,i)perylene                                             | 191-24-2   | Yes - PAH | No   | 9.30E-08                                                         | 1.75E-05                               | 3.14E-06                               |
| Benzo(k)fluoranthene                                             | 207-08-9   | Yes - PAH | Yes  | 3.60E-08                                                         | 6.76E-06                               | 1.22E-06                               |
| Chrysene                                                         | 218-01-9   | Yes - PAH | No   | 3.80E-08                                                         | 7.13E-06                               | 1.28E-06                               |
| Dibenzo(a,h)anthracene                                           | 53-70-3    | Yes - PAH | Yes  | 9.10E-09                                                         | 1.71E-06                               | 3.07E-07                               |
| Fluoranthene                                                     | 206-44-0   | Yes - PAH | No   | 1.60E-06                                                         | 3.00E-04                               | 5.41E-05                               |
| Fluorene                                                         | 86-73-7    | Yes - PAH | No   | 3.40E-06                                                         | 6.38E-04                               | 1.15E-04                               |
| Formaldehyde                                                     | 50-00-0    | Yes       | Yes  | 4.40E-03                                                         | 8.26E-01                               | 1.49E-01                               |
| Indeno(1,2,3-c,d)pyrene                                          | 193-39-5   | Yes - PAH | Yes  | 8.70E-08                                                         | 1.63E-05                               | 2.94E-06                               |
| Naphthalene                                                      | 91-20-3    | Yes - PAH | Yes  | 9.70E-05                                                         | 1.82E-02                               | 3.28E-03                               |
| Octachlorodibenzo-p-dioxins<br>(2,3,7,8 TCDD Eqv.) <sup>2</sup>  | 3268-87-9  | No        | No   | 6.60E-08                                                         | 3.72E-09                               | 6.69E-10                               |
| Pentachlorodibenzo-p-dioxins<br>(2,3,7,8 TCDD Eqv.) <sup>2</sup> | 40321-76-4 | No        | No   | 1.50E-09                                                         | 2.82E-07                               | 5.07E-08                               |
| Phenanthrene                                                     | 85-01-8    | Yes - PAH | No   | 7.00E-06                                                         | 1.31E-03                               | 2.37E-04                               |
| Pyrene                                                           | 129-00-0   | Yes - PAH | No   | 3.70E-06                                                         | 6.94E-04                               | 1.25E-04                               |
| Arsenic                                                          | 7440-38-2  | Yes       | Yes  | 2.20E-05                                                         | 4.13E-03                               | 7.43E-04                               |
| Beryllium                                                        | 7440-41-7  | Yes       | Yes  | 1.10E-06                                                         | 2.06E-04                               | 3.72E-05                               |
| Cadmium                                                          | 7440-43-9  | Yes       | Yes  | 4.10E-06                                                         | 7.70E-04                               | 1.39E-04                               |
| Chromium, Total                                                  | 7440-47-3  | Yes       | Yes  | 2.10E-05                                                         | 3.94E-03                               | 7.10E-04                               |
| Chromium, Hexavalent <sup>3</sup>                                | 18540-29-9 | No        | Yes  | 3.50E-06                                                         | 6.57E-04                               | 1.18E-04                               |
| Copper                                                           | 7440-50-8  | No        | Yes  | 4.90E-05                                                         | 9.20E-03                               | 1.66E-03                               |
| Manganese                                                        | 7439-96-5  | Yes       | Yes  | 1.60E-03                                                         | 3.00E-01                               | 5.41E-02                               |
| Mercury                                                          | 7439-97-6  | Yes       | Yes  | 3.50E-06                                                         | 6.57E-04                               | 1.18E-04                               |
| Nickel                                                           | 7440-02-0  | Yes       | Yes  | 3.30E-05                                                         | 6.19E-03                               | 1.11E-03                               |
| Selenium                                                         | 7782-49-2  | Yes       | Yes  | 2.80E-06                                                         | 5.26E-04                               | 9.46E-05                               |
| Zinc                                                             | 7440-66-6  | No        | No   | 4.20E-04                                                         | 7.88E-02                               | 1.42E-02                               |
|                                                                  |            |           |      |                                                                  | <b>Total HAP</b>                       | <b>3.80E-01</b>                        |
|                                                                  |            |           |      |                                                                  | <b>Maximum Individual HAP</b>          | <b>1.49E-01</b>                        |

<sup>1</sup> Emission factors for biomass (wood residue) combustion are uncontrolled and from AP-42, Section 1.6 (Wood Residue Combustion), Tables 1.6-3 and 1.6-4. Pollutants with an emission factor rating of C, D, or E are not included.

<sup>2</sup> Dioxin and furan emissions apply a toxic equivalency (TEQ) factor obtained from the 72 FR 26545 in accordance with the 1998 TAP rule WAC 173-460-050(4)(b) adopted by SWCAA. Emissions shown in this table are expressed as an equivalent emissions of 2,3,7,8 TCDD. <https://www.govinfo.gov/content/pkg/FR-2007-05-10/pdf/E7-9015.pdf>

Octachlorodibenzo-p-dioxins TEQ: 0.0003

Pentachlorodibenzo-p-dioxins TEQ: 1

<sup>3</sup> Because the emission factor for "Chromium, Total" has an "A" rating and it is likely that a portion is in the form of hexavalent chromium, it conservative to use the emission factor for "Chromium, Hexavalent" even though it has a "C" rating.

**Table C-15a. Biomass Furnace Idle Parameters**

| Parameter                       | Value | Units    |
|---------------------------------|-------|----------|
| Maximum Heat Input <sup>1</sup> | 93.9  | MMBtu/hr |
| Maximum Annual Operation        | 500   | hr/yr    |

<sup>1</sup> Furnace abort heat input is assumed to be 50% of the maximum heat input for the unit based on operational data from other Drax facilities.

**Table C-15b. Biomass Furnace Idle Potential Emissions - Criteria Pollutants**

| Pollutant                      | Emission Factors <sup>1</sup><br>(lb/MMBtu) | Maximum Hourly<br>Emissions<br>(lb/hr) | Potential Annual<br>Emissions<br>(tpy) |
|--------------------------------|---------------------------------------------|----------------------------------------|----------------------------------------|
| CO                             | 0.60                                        | 56.31                                  | 14.08                                  |
| NO <sub>x</sub>                | 0.22                                        | 20.65                                  | 5.16                                   |
| VOC                            | 0.02                                        | 1.60                                   | 0.40                                   |
| Filterable PM                  | 0.56                                        | 52.56                                  | 13.14                                  |
| Condensable PM                 | 0.02                                        | 1.60                                   | 0.40                                   |
| Total PM                       | 0.58                                        | 54.15                                  | 13.54                                  |
| Total PM <sub>10</sub>         | 0.52                                        | 48.52                                  | 12.13                                  |
| Total PM <sub>2.5</sub>        | 0.45                                        | 41.95                                  | 10.49                                  |
| SO <sub>2</sub>                | 0.03                                        | 2.35                                   | 0.59                                   |
| Lead                           | 4.80E-05                                    | 4.50E-03                               | 1.13E-03                               |
| CH <sub>4</sub>                | 0.02                                        | 1.97                                   | 0.49                                   |
| N <sub>2</sub> O               | 0.01                                        | 1.22                                   | 0.31                                   |
| CO <sub>2</sub>                | 195.00                                      | 18,301                                 | 4575.19                                |
| CO <sub>2</sub> e <sup>2</sup> | 199.40                                      | 18,714                                 | 4678.40                                |

<sup>1</sup> Emission factors from AP-42 Section 1.6 (Wood Residue Combustion), Tables 1.6-1 through 1.6-4 (09/03).

<sup>2</sup> Global warming potential (GWP) for CH<sub>4</sub> is 25 and N<sub>2</sub>O is 298 for estimating CO<sub>2</sub>e emissions (40 CFR 98, Subpart A, Table A-1, effective January 1, 2014).

**Table C-15c. Biomass Furnace Idle Potential Emissions - HAP/TAP**

| Pollutant                                                        | CAS #      | HAP?      | TAP? | Biomass Combustion<br>Emission Factor <sup>1</sup><br>(lb/MMBtu) | Maximum Hourly<br>Emissions<br>(lb/hr) | Potential Annual<br>Emissions<br>(tpy) |
|------------------------------------------------------------------|------------|-----------|------|------------------------------------------------------------------|----------------------------------------|----------------------------------------|
| Acenaphthene                                                     | 83-32-9    | Yes - PAH | No   | 9.10E-07                                                         | 8.54E-05                               | 2.14E-05                               |
| Acenaphthylene                                                   | 208-96-8   | Yes - PAH | No   | 5.00E-06                                                         | 4.69E-04                               | 1.17E-04                               |
| Acetaldehyde                                                     | 75-07-0    | Yes       | Yes  | 8.30E-04                                                         | 7.79E-02                               | 1.95E-02                               |
| Anthracene                                                       | 120-12-7   | Yes - PAH | No   | 3.00E-06                                                         | 2.82E-04                               | 7.04E-05                               |
| Benzo(a)anthracene                                               | 56-55-3    | Yes - PAH | Yes  | 6.50E-08                                                         | 6.10E-06                               | 1.53E-06                               |
| Benzene                                                          | 71-43-2    | Yes       | Yes  | 4.20E-03                                                         | 3.94E-01                               | 9.85E-02                               |
| Benzo(a)pyrene                                                   | 50-32-8    | Yes - PAH | Yes  | 2.60E-06                                                         | 2.44E-04                               | 6.10E-05                               |
| Benzo(b)fluoranthene                                             | 205-99-2   | Yes - PAH | Yes  | 1.00E-07                                                         | 9.39E-06                               | 2.35E-06                               |
| Benzo(g,h,i)perylene                                             | 191-24-2   | Yes - PAH | No   | 9.30E-08                                                         | 8.73E-06                               | 2.18E-06                               |
| Benzo(k)fluoranthene                                             | 207-08-9   | Yes - PAH | Yes  | 3.60E-08                                                         | 3.38E-06                               | 8.45E-07                               |
| Chrysene                                                         | 218-01-9   | Yes - PAH | No   | 3.80E-08                                                         | 3.57E-06                               | 8.92E-07                               |
| Dibenzo(a,h)anthracene                                           | 53-70-3    | Yes - PAH | Yes  | 9.10E-09                                                         | 8.54E-07                               | 2.14E-07                               |
| Fluoranthene                                                     | 206-44-0   | Yes - PAH | No   | 1.60E-06                                                         | 1.50E-04                               | 3.75E-05                               |
| Fluorene                                                         | 86-73-7    | Yes - PAH | No   | 3.40E-06                                                         | 3.19E-04                               | 7.98E-05                               |
| Formaldehyde                                                     | 50-00-0    | Yes       | Yes  | 4.40E-03                                                         | 4.13E-01                               | 1.03E-01                               |
| Indeno(1,2,3-c,d)pyrene                                          | 193-39-5   | Yes - PAH | Yes  | 8.70E-08                                                         | 8.16E-06                               | 2.04E-06                               |
| Naphthalene                                                      | 91-20-3    | Yes - PAH | Yes  | 9.70E-05                                                         | 9.10E-03                               | 2.28E-03                               |
| Octachlorodibenzo-p-dioxins<br>(2,3,7,8 TCDD Eqv.) <sup>2</sup>  | 3268-87-9  | No        | No   | 6.60E-08                                                         | 1.86E-09                               | 4.65E-10                               |
| Pentachlorodibenzo-p-dioxins<br>(2,3,7,8 TCDD Eqv.) <sup>2</sup> | 40321-76-4 | No        | No   | 1.50E-09                                                         | 1.41E-07                               | 3.52E-08                               |
| Phenanthrene                                                     | 85-01-8    | Yes - PAH | No   | 7.00E-06                                                         | 6.57E-04                               | 1.64E-04                               |
| Pyrene                                                           | 129-00-0   | Yes - PAH | No   | 3.70E-06                                                         | 3.47E-04                               | 8.68E-05                               |
| Arsenic                                                          | 7440-38-2  | Yes       | Yes  | 2.20E-05                                                         | 2.06E-03                               | 5.16E-04                               |
| Beryllium                                                        | 7440-41-7  | Yes       | Yes  | 1.10E-06                                                         | 1.03E-04                               | 2.58E-05                               |
| Cadmium                                                          | 7440-43-9  | Yes       | Yes  | 4.10E-06                                                         | 3.85E-04                               | 9.62E-05                               |
| Chromium, Total                                                  | 7440-47-3  | Yes       | Yes  | 2.10E-05                                                         | 1.97E-03                               | 4.93E-04                               |
| Chromium, Hexavalent <sup>3</sup>                                | 18540-29-9 | No        | Yes  | 3.50E-06                                                         | 3.28E-04                               | 8.21E-05                               |
| Copper                                                           | 7440-50-8  | No        | Yes  | 4.90E-05                                                         | 4.60E-03                               | 1.15E-03                               |
| Manganese                                                        | 7439-96-5  | Yes       | Yes  | 1.60E-03                                                         | 1.50E-01                               | 3.75E-02                               |
| Mercury                                                          | 7439-97-6  | Yes       | Yes  | 3.50E-06                                                         | 3.28E-04                               | 8.21E-05                               |
| Nickel                                                           | 7440-02-0  | Yes       | Yes  | 3.30E-05                                                         | 3.10E-03                               | 7.74E-04                               |
| Selenium                                                         | 7782-49-2  | Yes       | Yes  | 2.80E-06                                                         | 2.63E-04                               | 6.57E-05                               |
| Zinc                                                             | 7440-66-6  | No        | No   | 4.20E-04                                                         | 3.94E-02                               | 9.85E-03                               |
|                                                                  |            |           |      |                                                                  | <b>Total HAP</b>                       | <b>2.64E-01</b>                        |
|                                                                  |            |           |      |                                                                  | <b>Maximum Individual HAP</b>          | <b>1.03E-01</b>                        |

<sup>1</sup> Emission factors for biomass (wood residue) combustion are uncontrolled and from AP-42, Section 1.6 (Wood Residue Combustion), Tables 1.6-3 and 1.6-4. Pollutants with an emission factor rating of C, D, or E are not included.

<sup>2</sup> Dioxin and furan emissions apply a toxic equivalency (TEQ) factor obtained from the 72 FR 26545 in accordance with the 1998 TAP rule WAC 173-460-050(4)(b) adopted by SWCAA. Emissions shown in this table are expressed as an equivalent emissions of 2,3,7,8 TCDD. <https://www.govinfo.gov/content/pkg/FR-2007-05-10/pdf/E7-9015.pdf>

Octachlorodibenzo-p-dioxins TEQ: 0.0003

Pentachlorodibenzo-p-dioxins TEQ: 1

<sup>3</sup> Because the emission factor for "Chromium, Total" has an "A" rating and it is likely that a portion is in the form of hexavalent chromium, it conservative to use the emission factor for "Chromium, Hexavalent" even though it has a "C" rating.



**Table C-16a. Criteria Pollutant Model Results - NAAQS Comparison**

| <b>Pollutant</b>  | <b>Averaging Period</b> | <b>Design Concentration</b> | <b>Modeled Concentration (µg/m<sup>3</sup>)</b> | <b>Background Concentration (µg/m<sup>3</sup>)</b> | <b>Total Concentration (µg/m<sup>3</sup>)</b> | <b>NAAQS (µg/m<sup>3</sup>)</b> | <b>Above NAAQS?</b> |
|-------------------|-------------------------|-----------------------------|-------------------------------------------------|----------------------------------------------------|-----------------------------------------------|---------------------------------|---------------------|
| PM <sub>10</sub>  | 24-hr                   | H2H                         | 25.2                                            | 53.1                                               | 78                                            | 150                             | No                  |
| PM <sub>2.5</sub> | 24-hr                   | H8H                         | 8.3                                             | 19.1                                               | 27.4                                          | 35                              | No                  |
|                   | annual                  | Average                     | 1.3                                             | 6.2                                                | 7                                             | 12                              | No                  |
| SO <sub>2</sub>   | 1-hr                    | H4H                         | 16                                              | 14.2                                               | 31                                            | 196                             | No                  |
| NO <sub>2</sub>   | 1-hr                    | H8H                         | 100                                             | 20.6                                               | 120                                           | 188                             | No                  |
|                   | annual                  | Average                     | 3.8                                             | 67.9                                               | 72                                            | 100                             | No                  |
| CO                | 1-hr                    | H2H                         | 1,816                                           | 1,371                                              | 3,187                                         | 40,000                          | No                  |
|                   | 8-hr                    | H2H                         | 812                                             | 956                                                | 1,768                                         | 10,000                          | No                  |

Table C-17a. TAP Pollutant Model Results - 1998 and 2019 ASIL Comparison

| Model ID  | Pollutant                                                 | CAS #       | Averaging Period | ASIL (µg/m³) |          | Results (µg/m³) | Above ASIL? |      |
|-----------|-----------------------------------------------------------|-------------|------------------|--------------|----------|-----------------|-------------|------|
|           |                                                           |             |                  | 1998         | 2019     |                 | 1998        | 2019 |
| Annual_1  | Acetaldehyde                                              | 75-07-0     | Annual           | 0.45         | 0.37     | 5.52E-02        | No          | No   |
| Annual_2  | Benzene                                                   | 71-43-2     | Annual           | 0.12         | 0.13     | 3.49E-03        | No          | No   |
| Annual_3  | Formaldehyde                                              | 50-00-0     | Annual           | 7.70E-02     | 0.17     | 0.11            | Yes         | No   |
| Annual_4  | Arsenic                                                   | 7440-38-2   | Annual           | 2.30E-04     | 3.00E-04 | 1.83E-05        | No          | No   |
| Annual_5  | Beryllium                                                 | 7440-41-7   | Annual           | 4.20E-04     | 4.20E-04 | 9.13E-07        | No          | No   |
| Annual_6  | Cadmium                                                   | 7440-43-9   | Annual           | 5.60E-04     | 2.40E-04 | 3.41E-06        | No          | No   |
| Annual_7  | Chromium VI                                               | 18540-29-9  | Annual           | 8.30E-05     | 4.00E-06 | 2.91E-06        | No          | No   |
| Annual_8  | Nickel                                                    | 7440-02-0   | Annual           | 2.10E-03     | 3.80E-03 | 2.74E-05        | No          | No   |
| Annual_9  | Total Dioxins/Furans<br>(2,3,7,8 TCDD Eqv.)               | 136677-09-3 | Annual           | 3.00E-08     | --       | 1.26E-09        | No          | No   |
| Annual_10 | TAP Total Polycyclic Aromatic<br>Hydrocarbons (TAP - PAH) | 130498-29-2 | Annual           | 4.80E-04     | --       | 2.36E-06        | No          | No   |
| Annual_11 | Benzo(a)pyrene                                            | 50-32-8     | Annual           | 4.80E-04     | 1.00E-03 | 2.16E-06        | No          | No   |
| Annual_12 | Naphthalene                                               | 91-20-3     | Annual           | --           | 0.03     | 8.07E-05        | No          | No   |
| Annual_13 | Pentachlorodibenzo-p-dioxins                              | 40321-76-4  | Annual           | --           | 2.60E-08 | 1.24E-09        | No          | No   |
| Annual_14 | Diesel engine exhaust, particulate                        | 200         | Annual           | --           | 0.0033   | 3.08E-03        | No          | No   |
| 24-hr_1   | Propionaldehyde                                           | 123-38-6    | 24-hr            | --           | 8.0      | 0.26            | No          | No   |
| 24-hr_2   | Acrolein                                                  | 107-02-8    | 24-hr            | 0.02         | 0.35     | 0.31            | Yes         | No   |
| 24-hr_3   | Hydrochloric Acid                                         | 7647-01-0   | 24-hr            | 7.0          | 9.0      | 0.22            | No          | No   |
| 24-hr_4   | Manganese                                                 | 7439-96-5   | 24-hr            | 0.40         | 0.30     | 0.09            | No          | No   |
| 24-hr_5   | Phenol                                                    | 108-95-2    | 24-hr            | 63           | 200      | 1.72            | No          | No   |
| 24-hr_6   | Methanol                                                  | 67-56-1     | 24-hr            | 870          | 20,000   | 3.29            | No          | No   |
| 24-hr_7   | Mercury                                                   | 7439-97-6   | 24-hr            | 0.33         | 0.03     | 2.01E-04        | No          | No   |
| 24-hr_8   | Chromium III                                              | 16065-83-1  | 24-hr            | --           | 0.10     | 1.21E-03        | No          | No   |

| Acetaldehyde                  |                                 |                              |                    |
|-------------------------------|---------------------------------|------------------------------|--------------------|
| Description                   | ABE<br>Stack Test<br>11/28/2018 | ABE<br>Stack Test<br>7/13/21 | Maximum<br>Results |
| Regenerative Thermal Oxidizer |                                 | 0.350                        | 0.350              |

| Formaldehyde                  |                                 |                              |                    |
|-------------------------------|---------------------------------|------------------------------|--------------------|
| Description                   | ABE<br>Stack Test<br>11/28/2018 | ABE<br>Stack Test<br>7/13/21 | Maximum<br>Results |
| Regenerative Thermal Oxidizer | 0.5575                          | 0.880                        | 0.880              |

| Hydrochloric acid             |                                 |                              |                    |
|-------------------------------|---------------------------------|------------------------------|--------------------|
| Description                   | ABE<br>Stack Test<br>11/28/2018 | ABE<br>Stack Test<br>7/13/21 | Maximum<br>Results |
| Regenerative Thermal Oxidizer |                                 | 0.110                        | 0.110              |

| Methanol                      |                                 |                              |                    |
|-------------------------------|---------------------------------|------------------------------|--------------------|
| Description                   | ABE<br>Stack Test<br>11/28/2018 | ABE<br>Stack Test<br>7/13/21 | Maximum<br>Results |
| Regenerative Thermal Oxidizer |                                 | 1.580                        | 1.580              |

| Stack Test Emissions |       |       |        |          |
|----------------------|-------|-------|--------|----------|
| Pollutants           | ABE   |       |        |          |
|                      | RTO   |       |        |          |
|                      | °F    | lb/hr | ODT/hr | lb/ODT   |
| Acetaldehyde         | 1,676 | 0.350 | 52.75  | 6.64E-03 |
| Acrolein             | 1,676 | 0.150 | 52.75  | 2.84E-03 |
| Formaldehyde         | 1,676 | 0.880 | 52.75  | 1.67E-02 |
| Hydrochloric acid    | 1,676 | 0.110 | 52.75  | 2.09E-03 |
| Methanol             | 1,676 | 1.580 | 52.75  | 3.00E-02 |
| Phenol               | 1,676 | 0.680 | 52.75  | 1.29E-02 |
| Propionaldehyde      | 1,676 | 0.100 | 52.75  | 1.90E-03 |

**ATTACHMENT 3**

**Dryer Vendor Guarantee Letter**

**Drax**  
Monticello, Washington State

September 9<sup>th</sup>, 2022

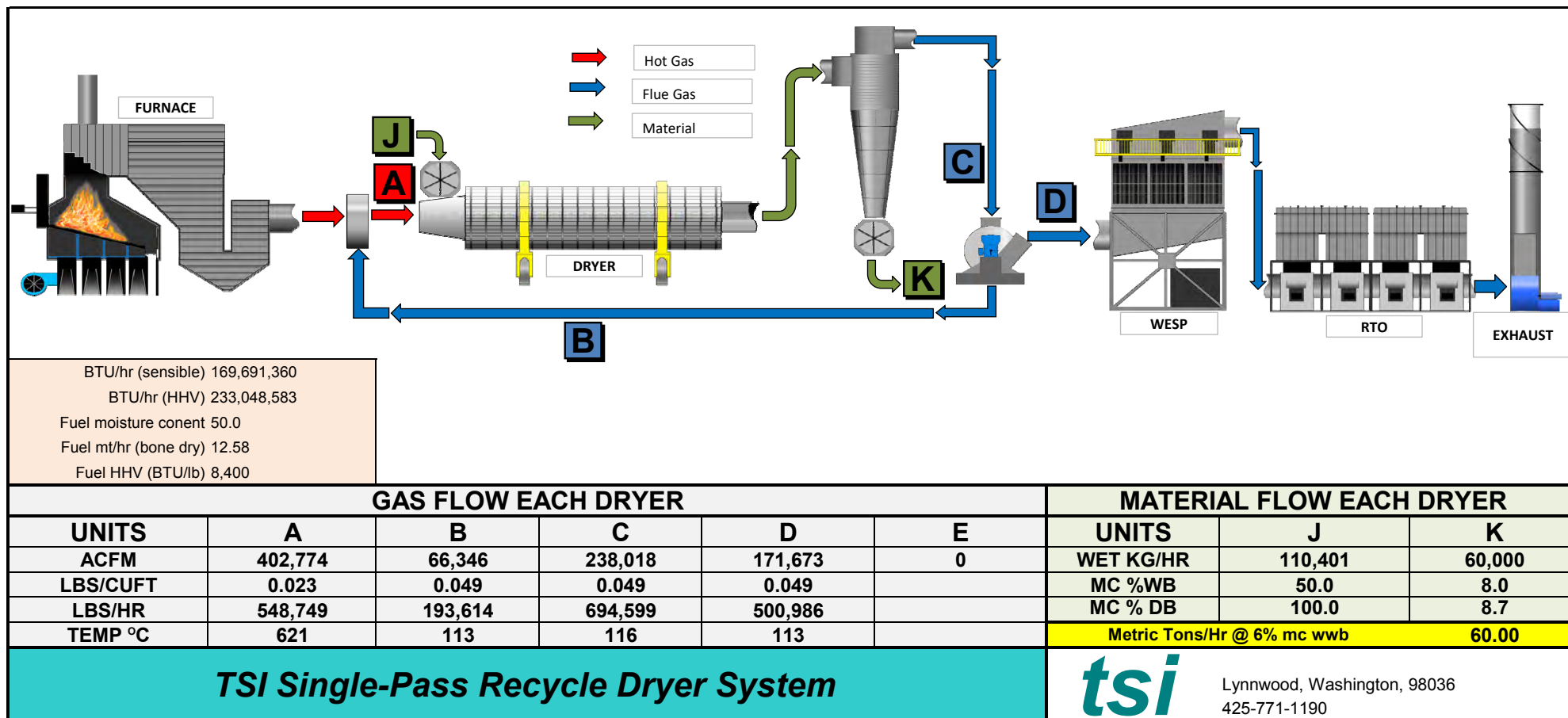
RE: Dryer Island Equipment Emissions

Drax will build a Pellet Plant located in Monticello, Washington State. The Pellet Plant will require a Dryer Island to dry wet-woody-biomass. The TSI Dryer Island consists of four (4) major pieces of equipment:

- 1) The Heat Energy System that burns wet-woody-biomass to generate heat for the Dryer System for the purpose of evaporating water from the wet-woody-biomass
  - a. During the combustion process the Heat Energy System will generate primarily 'fuel-bound' NOx; fuel-bound NOx is generated from nitrogen that is present in the fuel itself
  - b. The Heat Energy System will not generate much thermal NOx; thermal NOx is generated when heat within the system exceeds 2100°F and nitrogen from combustion air itself starts to turn into NOx
    - i. The Heat Energy System will not exceed 1850°F operating temperature and thus generating thermal NOx to any meaningful levels will not occur
  - c. A Heat Energy System that does not generate thermal NOx is considered a low-NOx Burner, since only NOx generated is from the fuel itself, which is inevitable; the only possible control a Burner has to control NOx is to control amount of thermal NOx
- 2) Before the Dryer Island can be started and run the WESP & the RTO must be available
  - a. Therefore, the WESP & the RTO are always running when Dryer Island is starting up and flue gasses from the Dryer Island are cleaned from Particulate and VOCs prior to being exhausted to atmosphere
- 3) During shutdown of the Dryer Island the WESP and the RTO are running and still cleaning the flue gas from the Particulate and the VOCs prior to being exhausted to atmosphere
- 4) If during Dryer Island operations there is an upset operating condition the system will abort gasses to atmosphere via the Furnace Abort Stack and the Dryer System Abort Stack
  - a. During this time feed to the Furnace and the Dryer System is stopped; therefore, the Furnace combustion is aborted and the Dryer System operations are slowly brought to a stop by aborting material to the Fire Dump

Best Regards,

Zlatko Savovic  
Sales Director and Mechanical Engineer  
TSI, Inc.  
(425) 239-7490  
[zsavovic@tsi-inc.net](mailto:zsavovic@tsi-inc.net)



A PROPOSAL TO PROVIDE A  
**DRYER ISLAND & RCO**

FOR

**drax**

Location: Monticello, Washington State



Budget Proposal # 220906

Submitted September 6<sup>th</sup>, 2022



20818 44<sup>th</sup> Ave West, Ste 201  
Lynnwood, WA 98036  
United States of America

Contact:  
Zlatko Savovic



Mobile Phone: +1 (425) 239-7490  
Office Phone: + 1 (425) 771-1190 x 132  
E-Mail: [zsavovic@tsi-inc.net](mailto:zsavovic@tsi-inc.net)



# CONTENTS

|                                                          |     |
|----------------------------------------------------------|-----|
| PROJECT REQUIREMENTS .....                               | 2   |
| EQUIPMENT SPECIFICATION – DRYER ISLAND .....             | 5   |
| EQUIPMENT SPECIFICATION – 120,000 ACFM RCO .....         | 8   |
| EQUIPMENT SPECIFICATION – 76,500 ACFM RCO (option) ..... | 9   |
| EMISSIONS .....                                          | 11  |
| PROPOSAL SUMMARY .....                                   | 12  |
| ITEM 01ENGINEERING.....                                  | 18  |
| ITEM 02 HEAT ENERGY SYSTEM .....                         | 19  |
| ITEM 03 DRYER SYSTEM .....                               | 32  |
| ITEM 04 WET ELECTROSTATIC PRECIPITATOR (WESP).....       | 56  |
| ITEM 05 REGENERATIVE THERMAL OXIDIZER (RTO) .....        | 69  |
| ITEM 06 REGENERATIVE CATALYTIC OXIDIZER (RCO) .....      | 83  |
| ITEM 07 SYSTEM CONTROLS .....                            | 100 |
| ITEM 08 SITE SERVICE.....                                | 103 |
| ITEM 09 REFRACTORY WORKS .....                           | 104 |
| ITEM 10 EQUIPMENT INSTALLATION .....                     | 105 |
| ITEM 11 ELECTRICAL WORKS .....                           | 108 |
| PRICING AND TERMS.....                                   | 112 |
| OPTIONS.....                                             | 113 |
| TSI: General Terms and Conditions .....                  | 114 |

## PROJECT REQUIREMENTS

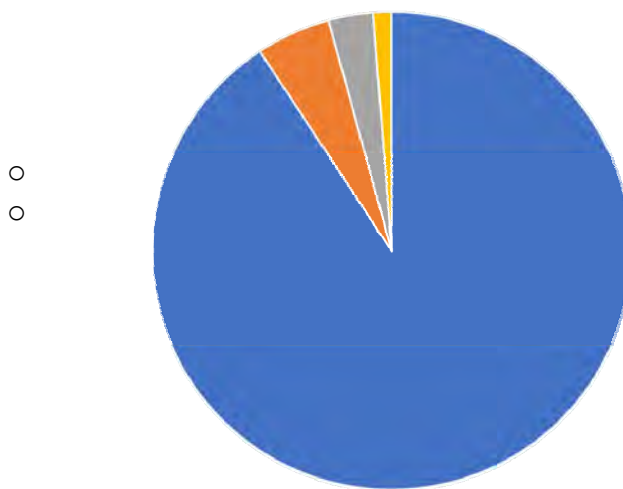
- **Site Information**

- Location: Washington State
- Maximum Ambient Temperature (°F): 120
- Minimum Ambient Temperature (°F): 20
- Design based on Average Ambient Temperature (°F): 60
- Site elevation above sea level: ≤50 feet

- **Dryer Island Design Conditions**

- Incoming Biomass Moisture Content wet-weight-basis: ≤50.0%
- Finished Biomass Moisture Content wet-weight-basis: 6.0%
  - 90% within ±1.0% of the target range
  - 95% within ±2.0% of the target range
  - 98% within ±3.0% of the target range
  - Below is a pie-chart representation of finished biomass moisture content characteristics

Finished Biomass Moisture Content Accuracy



- Wet-Woody-Biomass: 80% sawdust/shavings with up to 20% chips
  - Chips characteristics:
    - 100% will pass ¾" square mesh screen
- Chip Density: 18 to 22 lbs/cuft (wet)
  - TSI estimates this density; density to be verified prior to project start and if needed a price adjustment will be made
  - Prior to order the Buyer needs to supply TSI with a 5-gallon sample for laboratory testing to be performed by TSI
- Fuel Density: 12 to 22 lbs/cuft (OD)
  - TSI estimates this density; density to be verified prior to project start and if needed a price adjustment will be made
  - Prior to order the Buyer needs to supply TSI with a 5-gallon sample

for laboratory testing to be performed by TSI

- Fuel Moisture Content wet weight-basis: 40% to 50%
  - Fuel Higher Heating Value: 7,800 Btu/lb to 8,600 Btu/lb
  - Fuel required sizing:
    - 100% <6"
    - 90% <4"
    - 70% >2"
    - 25% <1"
    - 15% <1/2"
  - Species: 100% Softwoods, 100% Hardwoods, and any mix in-between
  - RTO Gas Pressure required (psig): 20 to 40
    - Minimum 15 psig at full flow
- **Regenerative Catalytic Oxidizer (RCO) Design Conditions**
    - There are two (2) options offered:
      - ≤120,000 ACFM
        - VOC (lbs/hr): 260
      - ≤76,500 ACFM
        - VOC (lbs/hr): 220
    - Temperature (°F): 120
    - Particulate (mg/Nm<sup>3</sup>): ≤115
    - Humidity (% by volume): ≥5
    - RCO Gas Pressure required (psig): 20 to 40
      - Minimum 15 psig at full flow

**Client: Drax****Location: Monticello, WA**

|                    |             |           |           |
|--------------------|-------------|-----------|-----------|
| Design Parameters: | Finished MC | Elevation | Chip Size |
|                    | 6% ±1%      | ≤50'      | ≤3/8"     |

| <b>PRODUCTION MATRIX</b><br><b>(dried metric tons/hr @ 6% moisture content wet-weight-basis)</b> |                     |      |      |      |      |      |
|--------------------------------------------------------------------------------------------------|---------------------|------|------|------|------|------|
| Infeed Moisture<br>wet-weight-basis                                                              | Ambient Temperature |      |      |      |      |      |
|                                                                                                  | 35°F                | 45°F | 55°F | 65°F | 75°F | 85°F |
| 55%                                                                                              | 48.2                | 49   | 49.7 | 50.7 | 51.1 | 51.4 |
| 50%                                                                                              | 59.3                | 59.9 | 61   | 62.2 | 62.7 | 63   |
| 45%                                                                                              | 72                  | 72   | 72   | 72   | 72   | 72   |

| Fuel Conditions for above noted calculations |        |
|----------------------------------------------|--------|
| FUEL: (DRY %)                                | WOOD   |
| CARBON %                                     | 49.48  |
| HYDROGEN %                                   | 5.83   |
| OXYGEN %                                     | 41.89  |
| NITROGEN %                                   | 0.20   |
| SULPHUR %                                    | 0.00   |
| ASH %                                        | 2.60   |
| TOTAL: (100)                                 | 100.00 |
| FUEL HHV dry                                 | 8,400  |
| FUEL MC %                                    | 50.00  |

## EQUIPMENT SPECIFICATION – DRYER ISLAND

- **Heat Energy System**

- Quantity: One (1)
- Size: **80m2 Grate**
- Fuel Moisture (wet-weight-basis): 35% minimum to 55% maximum
- Number of Combustion Chambers: Two (2) - primary & secondary
- Number of Wet-Ash Conveyors: Two (2)
- Metering Bin capacity: Twenty (20) minutes
- Abort Stack: included
- Control Devices: Included
- Deluge Nozzles: Included
- Drives: Direct-coupled
- Structural Steel support & access: Included
- Structural Steel support & access finish: Painted
- Scope of supply start: Metering Bin
  - Buyer responsible for feeding fuel into the Metering Bin
- Scope of supply end: Wet Ash Conveyor discharge
  - Buyer responsible for supplying ash bin

- **Dryer System**

- Quantity: One (1)
- Dryer Drum Size: **Ø23' by 100' long** (nominal)
  - The Dryer Drum comprises nine (9) 10' long sections that are bolted together
  - Inlet to Outlet Seal nominal length is 100'
- Hot Gas Isolation Gate: Included
- Blending Duct Isolation Gate: Included
- Metering Bin capacity: Forty-five (45) minutes
- Infeed Airlock type: Feeder type (knife tipped)
- Cyclone Airlock type: Feeder type (knife tipped)
- Quantity of Cyclones: Two (2)
- Cyclone Construction: ½" thick T1 for body/cone & 3/16" thick for hood
- Quantity of Cyclone Airlocks: two (2)
- Ductwork Expansion Joints: corrugated Stainless-Steel
- Double-Ductwork: Included
  - Primary Double-Duct Heat Source: Air-Air Heat Exchanger
  - Backup Double-Duct Heat Source: Electrical Heater
- ID Fan: 900 RPM
  - 900 RPM ID Fan provides for lower noise and is less susceptible to vibrations
  - Lower wear and maintenance
  - Materials of construction: Stainless-Steel for housing with Carbon-Steel external stiffeners; Carbon-Steel for shaft & wheel
- ID Fan Expansion Joints: corrugated Stainless-Steel
- Abort Stack: Included
- Control Devices: Included
- Explosion Panels: Included (NFPA certified)
- Deluge Nozzles: Included

- Drives: Direct-coupled
- Structural Steel support & access: Included
- Structural Steel support & access finish: Painted
- Scope of supply start: Metering Bin
  - Buyer responsible for feeding chips into the Metering Bin
- Scope of supply end: Collection Screw
  - Buyer responsible for receiving dried chips from the Collection Screw

- **WESP**

- Quantity: One (1)
- Number of Ø10" tubes: **936**
- Number of Fields: Four (4)
- Centrifuge: included
- Control Devices: Included
- Drives: Direct-coupled
- Structural Steel support & access: Included
- Structural Steel support & access finish: Painted
- Scope of supply start: Quench-Duct
  - Quench-Duct connects to the Dryer System's Abort Stack
- Scope of supply end: Centrifuge
  - Buyer responsible for receiving 'sludge' from the Centrifuge

- **RTO**

- Quantity: One (1)
- Four (4) CAN RTO
  - **Each CAN measures 11' wide by 34' long by 8' tall**
- Number of Combustion Chambers: Two (2)
- Heat Recovery Media and Internal Refractory quantities (total ft3):
 

|                           |       |
|---------------------------|-------|
| ▪ Saddle Lexco:           | 1,320 |
| ▪ Corpac (Flexo type-28): | 2,640 |
| ▪ Monolith LA10-32:       | 2,640 |
| ▪ Monolith NT40:          | 2,640 |
| ▪ Internal Refractory:    | 6,200 |
- Projected Gas Consumption: 8.8 mmBTU/hr
  - Projected gas consumption is based on following emissions entering the RTO:
 

|                            |      |
|----------------------------|------|
| – VOC (lbs/hr):            | ≥350 |
| – CO (lbs/hr):             | ≥100 |
| – HAPs (lbs/hr):           | ≥100 |
| – Condensable PM (lbs/hr): | ≥200 |
- FD Fan: 900 RPM
  - 900 RPM ID Fan provides for lower noise and is less susceptible to vibrations
  - Lower wear and maintenance
  - Stainless-Steel construction
- Control Devices: Included
- Drives: Direct-coupled
- Structural Steel support & access: Included
- Structural Steel support & access finish: Painted

- Scope of supply start: Mist Eliminator Chamber
  - WESP discharge duct connects to the Mist Eliminator Chamber
- Scope of supply end: Exhaust Stack
  - Flue gas is exhausted to atmosphere via the Exhaust Stack
  - Height (ft): sixty (60)
  - Diameter (in): 90

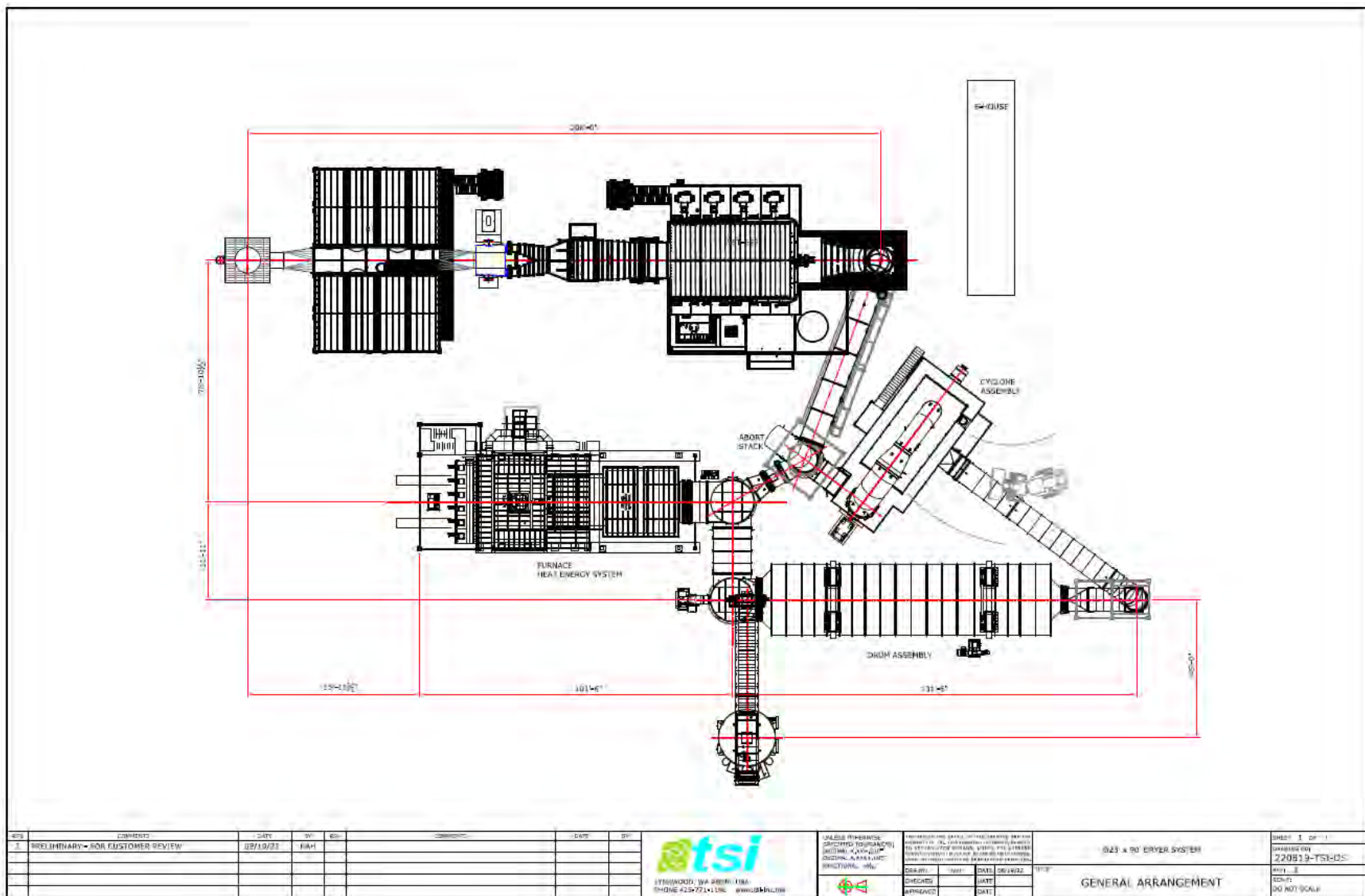
## EQUIPMENT SPECIFICATION – 120,000 ACFM RCO

- Four (4) CAN RCO
- **Each CAN measures 11' wide by 26' long by 8' tall**
- Number of Combustion Chambers: Two (2)
- Heat Recovery Media and Internal Refractory quantities (total ft<sup>3</sup>):
  - Saddle Lexco: 1,000
  - Corpac (Flexo type-28): 2,000
  - Monolith LA10-32: 2,000
  - Monolith NT40: 2,000
  - Catalyst (6x6x4 blocks): 4,200
  - Internal Refractory: 5,400
- Projected Gas Consumption: 2.2 mmBTU/hr
  - Projected gas consumption is based on the following emissions entering the RTO:
    - VOC (lbs/hr): ≥260
    - Condensable PM (mg/Nm<sup>3</sup>): ≥115
- FD Fan: 900 RPM
  - 900 RPM ID Fan provides for lower noise and is less susceptible to vibrations
  - Lower wear and maintenance
  - Stainless-Steel construction
- Control Devices: Included
- Drives: Direct-coupled
- Structural Steel support & access: Included
- Structural Steel support & access finish: Painted
- Scope of supply start: Quench-Duct
  - Buyer responsible to connect Pelletizing Island flue gas to the Quench-Duct
  - Quench-Duct total length included (ft): 50
- Scope of supply end: Exhaust Stack
  - Flue gas is exhausted to atmosphere via the Exhaust Stack
  - Height (ft): sixty (60)
  - Diameter (in): 72



## EQUIPMENT SPECIFICATION – 76,500 ACFM RCO (option)

- Two (2) CAN RCO
- **Each CAN measures 11' wide by 33' long by 8' tall**
- Number of Combustion Chambers: One (1)
- Heat Recovery Media and Internal Refractory quantities (total ft<sup>3</sup>):
  - Saddle Lexco: 640
  - Corpac (Flexo type-28): 1,280
  - Monolith LA10-32: 1,280
  - Monolith NT40: 1,280
  - Catalyst (6x6x4 blocks): 2,688
  - Internal Refractory: 3,200
- Projected Gas Consumption: 0.7 mmBTU/hr
  - Projected gas consumption is based on the following emissions entering the RTO:
    - VOC (lbs/hr): ≥220
    - Condensable PM (mg/Nm<sup>3</sup>): ≥115
- FD Fan: 900 RPM
  - 900 RPM ID Fan provides for lower noise and is less susceptible to vibrations
  - Lower wear and maintenance
  - Stainless-Steel construction
- Control Devices: Included
- Drives: Direct-coupled
- Scope of supply start: Quench-Duct
  - Buyer responsible to connect Pelletizing Island flue gas to the Quench-Duct
  - Quench-Duct total length included (ft): 50
- Scope of supply end: Exhaust Stack
  - Flue gas is exhausted to atmosphere via the Exhaust Stack
  - Height (ft): sixty (60)
  - Diameter (in): 60



DRYER ISLAND PRELIMINARY LAYOUT

## EMISSIONS

- **Dryer Island**

- Total Particulate (PM) (lbs/hr): ≤15 lbs/hr
- Volatile Organic Compounds (VOC) (lbs/hr): ≤15 lbs/hr
- Carbon Monoxide (CO) (lbs/hr): ≤42 lbs/hr
- Nitrogen Oxide (NOx) (lbs/hr): ≤52 lbs/hr

- **RCO – 120,000 ACFM**

- Total Particulate (PM) (lbs/hr): ≤14 lbs/hr
- Volatile Organic Compounds (VOC) (lbs/hr): ≤13 lbs/hr or ≥95% destruction efficiency
- Carbon Monoxide (CO) (lbs/hr): ≤14 lbs/hr
- Nitrogen Oxide (NOx) (lbs/hr): ≤5 lbs/hr

- **RCO – 76,500 ACFM (option instead of the 120,000 ACFM RCO)**

- Total Particulate (PM) (lbs/hr): ≤11 lbs/hr
- Volatile Organic Compounds (VOC) (lbs/hr): ≤11 lbs/hr or ≥95% destruction efficiency
- Carbon Monoxide (CO) (lbs/hr): ≤12 lbs/hr
- Nitrogen Oxide (NOx) (lbs/hr): ≤4 lbs/hr

*Notes:*

- *Show above are projected emissions from the Dryer Island RTO Exhaust Stack*
- *Emissions measured via USEPA approved testing methods; emissions based on above noted design criteria & guaranteed production rates*
- *NOx emissions for Dryer Island are based on fuel nitrogen level at 0.22% bone dry basis*
  - *Higher nitrogen content within fuel will result in higher NOx emissions*

## **PROPOSAL SUMMARY**

This Proposal is for a complete Dryer Island. The Dryer Island consists of one (1) Heat Energy System, one (1) Dyer System, one (1) Wet Electrostatic Precipitator (WESP), and one (1) Regenerative Thermal Oxidizer (RTO).

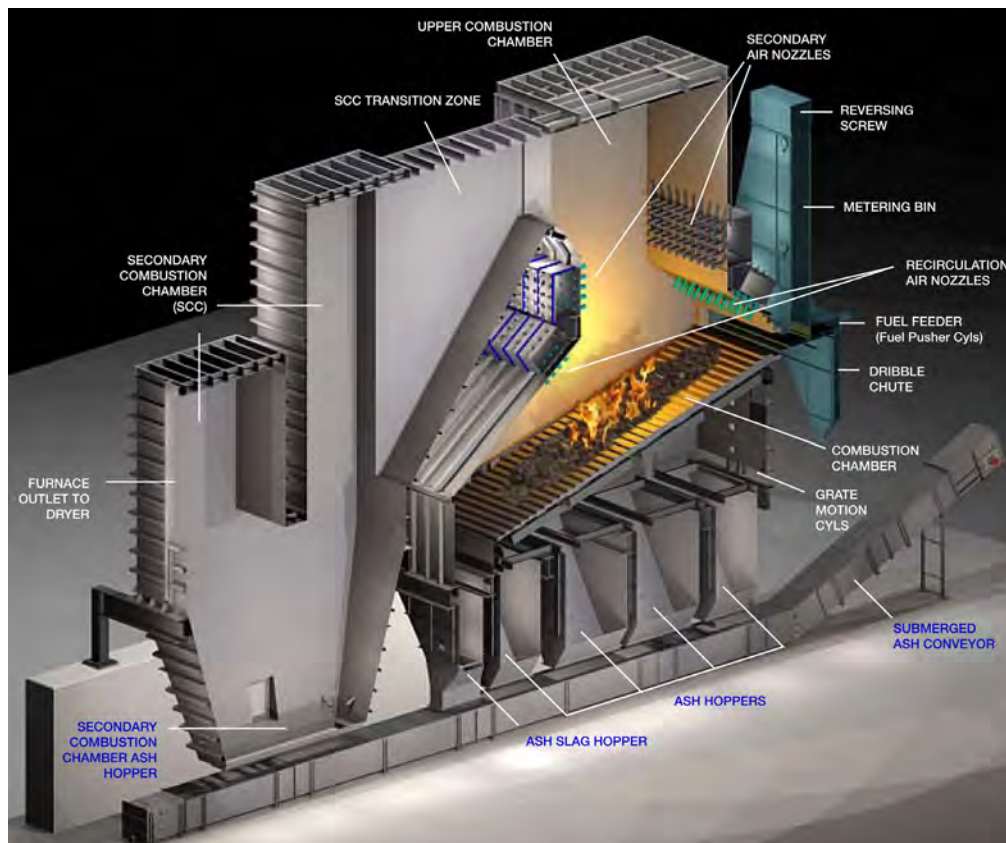
This Proposal also offers a Regenerative Catalytic Oxidizer (RCO) with a Disengagement Chamber located ahead of the RCO. The RCO treats flue gas from the Buyer's Pelletizing Island.

The following pages describe the purpose and operations of each unit.

## Heat Energy System

The Heat Energy System receives wet fuel (bark or chips), combusts that fuel in an efficient manner, and delivers products of combustion to the Dryer System for purpose of drying wet-woody-biomass.

TSI Heat Energy System mechanical scope of supply begins immediately after the Buyer's fuel infeed conveyor to the Metering Bin. The bottom of the Metering Bin has hydraulic ram pushers that push fuel one the reciprocating grates, which are housed within the Primary Combustion Chamber. There are 4-zones of moving reciprocating grates. The 1<sup>st</sup> zone dries fuel to point of combustion; the 2<sup>nd</sup> and 3<sup>rd</sup> zones begin combustion; the 4<sup>th</sup> zone oscillates slowest to burn off most of the carbon before inorganics like ash and slag are discharged into the Wet Ash Conveyor. The Wet Ash Conveyor is sub-merged in water and provides an affective airlock that prevents ambient air leaking into the Heat Energy System. The Wet Ash Conveyor conveys ash and slag to a bin or bunker, provided by the Buyer, that is accessible via mobile equipment for periodic removal from the plant site. There are two combustion fans: the Primary Fan starts combustion and prevents grates from over-heating, while Secondary Fan completes combustion process in the Upper Combustion Chamber. Hot gas from the Upper Combustion Chamber enters the Secondary Combustion Chamber designed with a downward U-turn that will remove significant amount of fly ash and sparks from the gas stream prior to entry into the Dryer System. An Emergency Stack, which vents gases during upset conditions to atmosphere, is located on top of the Upper Combustion Chamber. The Combustion Chambers are lined with refractory and insulation materials.



## Dryer System

The Dryer System dries wet-woody-biomass to the moisture content required by the Buyer. TSI Dryer System mechanical scope of supply begins immediately after the Buyer's infeed to the Metering Bin. The Metering Bin stores and meters wet-material into the Dryer Drum via Infeed Airlock and Inlet Fitting. Hot Gas Ductwork connects the Heat Energy System to the Dryer System. Within the Hot Gas Ductwork are the Hot Gas Isolation Gate, the Dilution Bustle, and the Inlet Fitting. The Hot Gas Ductwork is lined with refractory and insulation materials. The Inlet Fitting processes mixed gas from the Dilution Bustle and the wet-woody-biomass into the Dryer Drum. The Dryer Drum is a 'convection-type' single-pass unit that is responsible for distributing and classifying each biomass particle to allow for its efficient drying. This is accomplished with utilization of a complex 'flighting system' within the Dryer Drum that has been perfected to an advanced stage. The Dryer Drum dries wet-woody-biomass to the required moisture content and exhausts flue-gas and dried biomass into the Material Duct. As dried biomass exits the Dryer Drum it is pneumatically conveyed via the Material Duct into the High Efficiency Cyclone(s). The High Efficiency Cyclone(s) removes dried biomass from the flue-gas stream, discharges dried biomass into Cyclone Airlock(s), and exhausts flue-gas stream out the top and into the Gas Duct towards the Induced Draft Fan (ID Fan). Dried biomass from the Cyclone Airlock(s) is received by the Collection Screw, which under normal operating conditions conveys dried biomass to the Buyer; during upset operating conditions the Collection Screw reverses direction and dumps material into the Buyer's Fire Dump. The ID Fan flow is controlled by a Variable Frequency Drive, which is governed by the pressure differential reading across the High Efficiency Cyclone(s). The temperature control at the outlet of the Drum is controlled by the Dilution Damper and this control loop ensures proper moisture content of the biomass. TSI Dryer Systems are equipped with advanced spark detects, temperature elements, and strategically positioned water deluge nozzles to enable water delivery throughout the system with and without the ID Fan running.

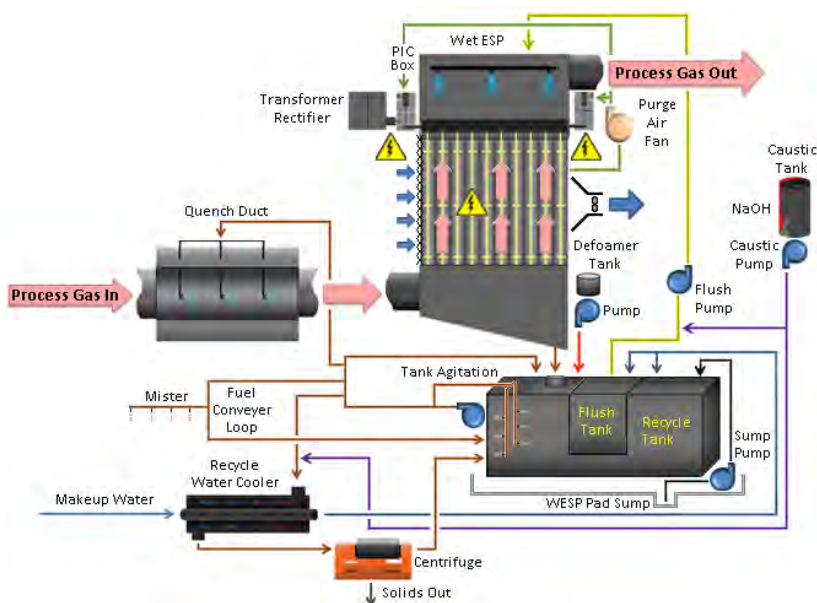




## Wet Electrostatic Precipitator

The Wet Electrostatic Precipitator (WESP) removes particulate from the gas stream before the gas stream enters the Regenerative Thermal Oxidizer (RTO). There are two (2) types of particulates: the filterable ('front-half') particulate and condensable ('back-half') particulate. The WESP will remove  $\geq 95\%$  of the front-half particulate as well as any back-half particulate that condenses from the gas stream and into a water particle at temperature of 160°F to 180°F. Back-half particulate that doesn't condense will pass thru the WESP and burn-off within the RTO's combustion chamber.

Dryer flue-gas enters the WESP through the Quench-Duct, which includes recirculated water sprays that saturate the gas stream and condense some of the vaporous particulate. It also serves as a pre-filter by scrubbing out larger particulate and fiber carryover. The gas stream enters the bottom of the WESP through a common plenum and travels upward into parallel tube bundles. Each tube bundle is an array of Stainless-Steel collection tubes that have high voltage discharge electrodes suspended within them. The electrodes have a series of discs that create an intense electric field (Corona) when high voltage is applied. As the gas stream passes between the collection tubes and the discharge electrode, the suspended particles become negatively charged and are driven towards the grounded collection tube (precipitation). Each tube bundle is periodically and independently flushed with a dilute caustic solution to remove the particulate from the collection tube wall. The spent flush water flows by gravity into the recycle system via the recycle tank located underneath the WESP. This serves to make up the majority of the water that is evaporated in the quench duct. A portion of the recycle water is processed through a centrifuge to remove suspended solids. The solids are collected in a tote (by Buyer) for disposal (this is a non-toxic discharge that can be sent to a regular land fill). The collection tube walls stay wet, which aids in the cleaning process, by drawing ambient air across the exterior surface with small fans. This air cools the collection tubes and promotes condensation from the saturated gas stream on the inner surface. This condensation makes up the remainder of the balance of water evaporated in the quench duct. As the cleaned gas exits the tube bundle it passes through the electrode suspension grid into a common plenum and is then ducted down to grade level where it is directed to the RTO. The electrode grid is charged by a high voltage transformer rectifier and is suspended at external insulator boxes. The insulator boxes are purged using warm air from the tube bundle cooling air, thus keep the insulator dry and improving overall performance.



## Regenerative Thermal Oxidizer

The Regenerative Thermal Oxidizer (RTO) receives particulate cleansed flue-gas from the WESP and combusts the uncondensed back-half Particulate (BHP), Volatile Organic Compounds (VOCs), Hazardous Air Pollutants (HAPs), and Carbon Monoxide (CO).

Cleansed flue-gas from the WESP first passes through the Mist Eliminator Chamber, which removes free water droplets. The flue-gas is then routed through a common duct manifold and into two of four Diverter Valves. The Diverter Valves enable the system to regularly reverse gas flow, which in combination with the heat recovery Media, provides an effective energy saving system. Flue-gas exits the inlet Diverter Valves and travels upward into the Hoppers. The Hoppers distribute gas into the inlet Heat Recovery Chambers, which contain Ceramic Media. This Media, which was heated from discharge gasses during the previous valve cycle, preheat flue-gas to approximately 1400°F before the flue-gas enters the Combustion Chamber. The Combustion Chamber is maintained at a temperature of 1500°F by a Gas Burner. Within the Combustion Chamber hydrocarbons are converted to CO<sub>2</sub> and H<sub>2</sub>O. Flue-gas exits through opposing heat recovery chambers, where the Media now acts as a heat sink and absorbs the thermal energy, cooling it to within 75°F to 100°F of the RTO inlet temperature, before discharging flue-gas into the Exhaust Stack. The Ceramic Media comes in a variety of types and specific selection depends on the application. The Diverter Valves continually reverse airflow based on a pre-programmed timer. By reversing the flow, the inlet chambers become the outlet chambers and vice versa. The chambers that have been heated by the exhausting flue-gas become a pre-heating media for the incoming flue-gas; while the chambers that have just been cooled by the incoming flue-gas can again be reheated by the exhausting gas. This heat recovery cycle makes the RTO ≥95% thermally efficient. Flue-gas is pushed through the RTO by a Forced Draft Fan (FD Fan) located between the Mist Eliminator Chamber and the RTO.





## Regenerative Catalytic Oxidizer

The Regenerative Catalytic Oxidizer (RCO) receives flue gas from the Buyer's Pelletizing Island, which is laden with Volatile Organic Compounds (VOCs) and Particulate Matter (PM), combusts the VOCs and PM and exhausts cleansed gas stream to the atmosphere via the Exhaust Stack.

The Buyer's Pelletizing Island flue gas enters the Quench Duct where a series of water nozzles sprays the gas stream with recycled water, thus reducing dust emissions entering the Disengagement Chamber upstream of the RCO. The Disengagement Chamber removes  $\geq 90\%$  of the water droplets and particulate 60 micron and larger. The water is collected in a recycle tank at Disengagement Chamber bottom, from where it is pumped back to the Quench Duct. A slip stream of about 50 GPM is diverted to a centrifuge for particulate removal. Cleansed flue-gas from the Disengagement Chamber is routed through a common duct manifold and into two of four Diverter Valves. The Diverter Valves enable the system to regularly reverse gas flow, which in combination with the heat recovery Media, provides an effective energy saving system. Flue-gas exits the inlet Diverter Valves and travels upward into the Hoppers. The Hoppers distribute gas into the inlet Heat Recovery Chambers, which contain Ceramic Media. This Media, which was heated from discharge gasses during the previous valve cycle, preheat flue-gas to approximately 800°F before the flue-gas enters the Burner Chamber. The Burner Chamber is maintained at a temperature of 850°F by a Gas Burner. Within the Catalytic Media itself is where the hydrocarbons are converted to  $\text{CO}_2$  and  $\text{H}_2\text{O}$ . Flue-gas exits through opposing heat recovery chambers, where the Media now acts as a heat sink and absorbs the thermal energy, cooling it to within 35°F to 50°F of the RCO inlet temperature, before discharging flue-gas into the Exhaust Stack. The Ceramic Media comes in a variety of types and specific selection depends on the application. The Diverter Valves continually reverse airflow based on a pre-programmed timer. By reversing the flow, the inlet chambers become the outlet chambers and vice versa. The chambers that have been heated by the exhausting flue-gas become a pre-heating media for the incoming flue-gas; while the chambers that have just been cooled by the incoming flue-gas can again be reheated by the exhausting gas. This heat recovery cycle makes the RCO  $\geq 95\%$  thermally efficient. Flue-gas is pushed through the RCO by a Forced Draft Fan (FD Fan) located between the Disengagement Chamber and the RCO.



## ITEM 01ENGINEERING

TSI engineers will work closely with the Buyer's engineer to properly lay-out the equipment, and to ensure proper interface with the Buyer's equipment upstream & downstream of the Dryer Island. As part of the Engineering package the Buyer will receive the following documents:

- Layouts
  - Plan view
  - Elevation views
- Foundation Load Drawings
- Motor List
- Device List
- Motor Location Drawings
- Device Location Drawings
- Fire Detection & Suppression Drawings
- Instrument Air Requirements
- PID Drawings
- Functional Description

## ITEM 02 HEAT ENERGY SYSTEM

*Shown below and on following pages are some of the major individual components that make up the Heat Energy System.*

### Flop Gate

The Flop Gate isolates fuel infeed equipment, like the conveyors, from the potential Furnace back-fires. The Flop Gate also eliminates air leakage into the Furnace during normal and upset operating conditions. The Flop Gate is located on top of the Metering Bin and it only opens when the Metering Bin fuel level reaches low level sensor. The Flop Gate blocks air (oxygen) from getting inside the Metering Bin during fuel feed upsets or when shutting down a Furnace which contributes to fires. It is operated pneumatically via pneumatic cylinders.



Flop Gate located on top of the Reversing Screw; the Reversing Screw is located on top of the Metering Bin

## Reversing Screw

The Reversing Screw is located directly above the Metering Bin and directs fuel to both sides of the Metering Bin, thus ensuring even fuel distribution within the Metering Bin. It provides for even fuel feed onto the reciprocating grates, which is critical to ensuring proper fuel combustion. The Reversing Screw reverses direction based on low level sensors located on both sides at the bottom of the Metering Bin.



Reversing Screw



## Metering Bin

The Metering Bin consists of fuel feed pushers that push fuel onto the 1<sup>st</sup> zone of the reciprocating grates located within the Primary Combustion Chamber. The Metering Bin holds fuel evenly with even density achieved due to the above-mentioned Reversing Screw, thus covering the entire grate area with fuel at a controlled fuel bed level. The complete grate area forms an active drying and combustion area. A double alarm system (level control furnace and level control fuel feeders) warns the Operator in case of interruptions of fuel supply. A gate valve and sprinkler system are installed for prevention of back burning into the Metering Bin.



Metering Bin  
(Shown with Reversing Screw & Flop Gate located directly above it)

## Reciprocating Grate Combustion Chamber

The Combustion Chamber constructed of a robust steel frame structure with moving and stationary grate frames. Reciprocating grate bars are carried by moving support frames. Stationary grate bars are supported by the structure frame. The reciprocating grate frames and grate bars are supported on ball bearings. There are four (4) zones of moving grates within the Furnace. Grates are fabricated from high heat resistant steel ASTM A297, Grade HD. Grates modulate from 10% to 100% and the Furnace has a 1:4 turndown ratio.

The grate bars are of high heat resistant alloy with cooling fins to prevent overheating; water cooling is not required. The grate bars are overlapping, thus preventing through fall of unburned fuel. A hydraulic power pack with pump operates the fuel feeders and grates.

The primary combustion air enters the fuel bed from the under-fire air zone through slots between the grate bars. The sides of the grate's assembly are cast steel side bars to protect the refractory of the furnace from abrasion by the moving grate bars.

The reciprocating grate bars are activated by hydraulic cylinders. The relative movement between stationary and moving grate bars causes the fuel to continually turn and convey along the grate to enhance the combustion process.



Complete Heat Energy System

(note: some items shown may not reflect actual that are offered within this Proposal)

## Hydraulic Power Pack

Hydraulics for ram feeder, shut off slide, grate cylinders, and the last grate section. Hydraulic Power Pack unit complete with one high-capacity hydraulic pump, complete with coupling, guard, three 4-way directional solenoid valves, tank trim, all components pre-piped, and mounted on a rigid tank.



Hydraulic Power Pack

## Hydraulic Displacement Pumps

Hydraulic Displacement Pumps operate all four (4) grate sections of the Furnace and control the speed of the strokes based on firing rate and controlling the speed of the pumps. Each pump motor requires a variable frequency drive.



Hydraulic Displacement Pumps



## Primary Air Fan

Forced draft fan with flanged inlet and outlet, inlet vane control damper, electric actuator with linkage and mounting bracket. The Primary Air Fan provides the primary combustion air into the under-fire air zones. Air is fed from under the grate bars and is controllable in each of the four sections.



Primary Air Fan (Under-fire Air)

## Secondary Air Fan

Secondary Air Fan is a forced draft fan with flanged inlet and outlet, inlet vane control damper, electric actuator with linkage and mounting bracket. The Secondary Air Fan feeds the air over the fuel pile for complete combustion of fuel.



Secondary Air Fan (Over-fire Air)



## Casing and Combustion Air Ducts

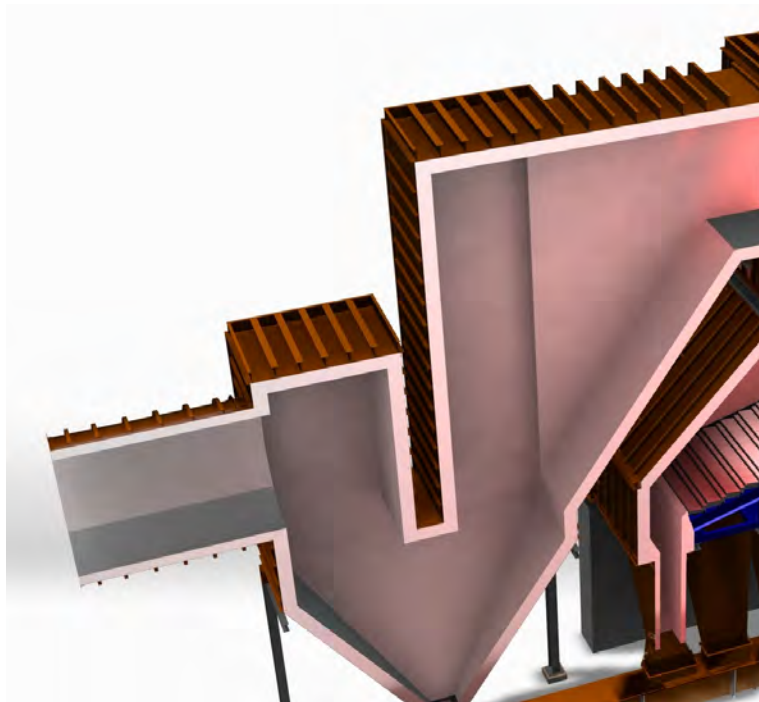
Carbon-Steel construction for the complete chamber with external stiffening beams. Ducting for the Primary and Secondary Air Fans from the fans to the Furnace air boxes and headers.



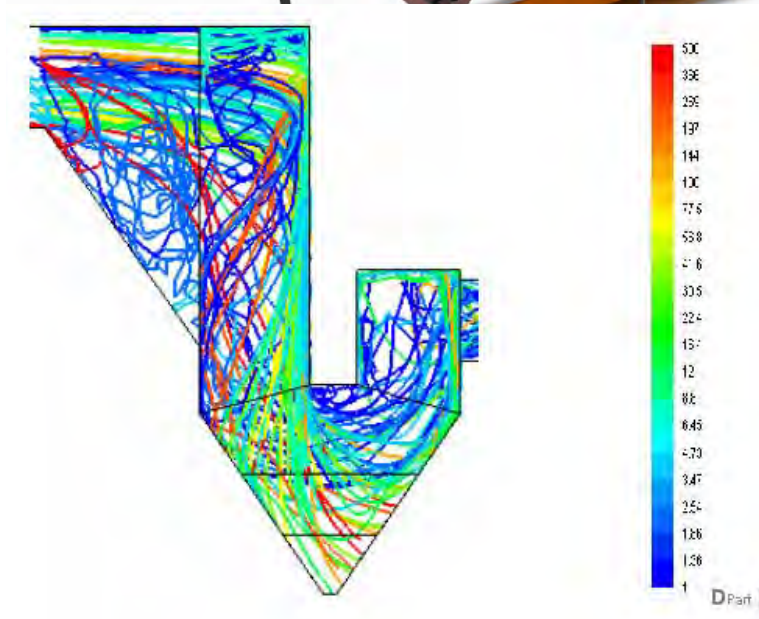
Furnace Casing & Combustion Air Ducts

## Secondary Combustion Chamber

This chamber provides final combustion of the gases from the Furnace. The chamber also provides for mixing of the furnace gas with the Dryer System flue-gas. After mixing and blending, the gases are discharged to the Dryer ducting. The Chamber is refractory lined and includes a drop out chamber and flue-gas turn around design for maximum removal of fly ash in front of the Dryer. The chamber is designed with the top as a secondary combustion chamber to burn-out the carry over and the bottom as an ash drop-out in order to get clean burned-out gas that can be directly fed into the dryer.



Right: Secondary Combustion Chamber/Ash Dropout Chamber



CFD - Fluid modeling of Ash drop section.

## Refractory

Internal refractory block insulation rated to 1900°F. Furnace material is plastic rated to 2700°F. Using low cement materials and installation to be done using shot-crete method. To be blown-in-place on site.

*Note: Refractory design by TSI; supply/installation/cure-out offered under Refractory Works option below within this document.*



Refractory shown with moving grates



## Wet Ash Conveyor

The Wet Ash Conveyor of drag chain design, complete with gearbox and drive, collects ash from underneath the Heat Energy System's reciprocating grate as well as from the Secondary Combustion Chamber's ash drop out chute. The Wet Ash Conveyor is submerged in water and it provides an effective air lock to the Heat Energy System, thus preventing ambient air from infiltrating and making the Heat Energy System less energy efficient.



Typical Wet Ash Conveyor

## Abort Stack

Mounted on top of the Furnace and includes a counter-weighted stack cap that is actuated via a pneumatic cylinder. The purpose of the Abort Stack is to open at high temperature and/or high pressure in the system as well as during plant power outages. It is fabricated from Carbon-Steel and refractory-lined for the first five (5) feet above the Furnace roof. The remainder of the stack is fabricated from Stainless-Steel. Stack cap is also refractory lined. During normal operating conditions the Abort Stack is kept closed via the pneumatic actuated damper; during a power outage when pneumatic air isn't available the stack-cap automatically opens due to the counter-weight.



Abort Stack

## Video Camera and Monitor

An air-cooled video camera is provided at the rear end of the Furnace with a monitor to allow for visual inspection of the furnace combustion process from the operator Control Room.



Typical Grate fire

## Control Devices

The following devices are supplied to control the Heat Energy System via PLC:

- Temperature Control Sensors
- Temperature Transmitters
- Zero Speed Switches
- Pressure Transmitters
- Proximity Switches (Capacitive and Inductive)
- Deluge Nozzles



## Structural Steel

### Purpose

*To provide structural support for the Heat Energy System and to provide personnel access via stairs, ladders, and platforms.*

### Description

TSI supplies the support structures, stairs, ladders, and platforms from grade level as is typically required by the Heat Energy System. This includes access to areas requiring regular maintenance or monitoring by operating personnel. Stair access is provided to areas requiring maintenance on a daily or weekly basis; longer maintenance intervals will have ladder access. Client will have opportunity during system design to comment on access and add more if needed with an appropriate price adjustment.

### Design Details

*Assembly:* Bolted and welded assembly.

*Finish:* Painted.



Typical Structural Steel (shown during construction)

## ITEM 03 DRYER SYSTEM

*Shown below and on following pages are some of the major individual components that make up the Dryer System.*

### Hot Gas Isolation Gate

#### Purpose

*When activated, to hold back gasses generated by the Heat Energy System from entering the Dryer System, and together with the Blending Duct Isolation Gate, provide safe passage for plant maintenance personnel into the Dryer System.*

#### Operation

The Hot Gas Isolation Gate is bolted between the Heat Energy System and the Blending Bustle. This gate together with the Blending Duct Isolation Gate enables plant personnel to seal off the Dryer System from the Heat Energy System. The Hot Gas Isolation Gate comprises a refractory lined housing assembly and a gate assembly that slides in the housing powered by two hydraulic cylinders. The gate center panel is a corrugated profile to allow for thermal expansion. The clearance between the frame of the gate and its housing is pressurized by a Seal Fan, to prevent leakage of hot gas into the Dryer System when the gate is in place, and thus enable for safe entry of plant personnel into the Dryer System.

#### Design Details

*Materials of construction:* Housing assembly is fabricated from Carbon-Steel plate for housing, with structural shapes for reinforcing; gate assembly is constructed from ¼" thick RA-253 reinforced floating structure.

*Actuator:* Twin hydraulic cylinders powered by a dedicated hydraulic power-pack and mounted external to the housing.

*Seals:* Seal fan.

*Insulation:* Two-layer refractory; low density layer with hard refractory face containing about 46% to 50% aluminum oxide.

*Note: Refractory design by TSI; supply/installation/cure-out offered under Refractory Works option below within this document.*





## Blending

### Purpose

*To control the flow of Dryer System flue-gas back to the Dryer Drum via the Blending Bustle.*

### Operation

Blending consists of a duct that runs from the discharge of the ID Fan to the Blending Bustle; the Blending Bustle is located between the Hot Gas Isolation Gate and the Inlet Fitting. Within the duct is a Blend Damper that modulates the amount of flue-gas blended back to the Dryer Drum. This control loop modulates to hold the Dryer Drum outlet temperature set point, which determines the moisture content of the biomass exiting the Dryer Drum. The Blend Damper is operated automatically via the PLC Controls. Within the duct is also a Blending Duct Isolation Gate that together with the aforementioned Hot Gas Isolation Gate, when closed, provides safe passage for plant maintenance personnel into the Dryer System.

The Heat Energy System generates hot gas at about 1650°F. This temperature needs to be 'cooled' prior to contacting wet-woody-biomass within the Dryer Drum. One way to cool this temperature is to utilize ambient fresh air, which isn't energy efficient, and can impact significantly the production capacity of the Dryer System during cold weather. The preferred method of cooling the Heat Energy System's hot gas is with the warm humid Dryer System flue-gas.

The Dilution benefits are:

- 1) Year-round stable operations
- 2) Better product conditioning as 'warm humid' gas better dries woody biomass
- 3) Up to 50% lower gas flow and emissions to atmosphere or to the Emission Control Equipment
- 4) Up to 25% lower fuel consumption by the Heat Energy System

## Blending Bustle

### Purpose

*To accept Blending gas and blend it back into the incoming hot gas stream generated by the Heat Energy System.*

### Operation

The Drying System is designed to recycle a portion of the spent gas back through the Dryer System. This has several advantages...

- The recycle gas is blended with the Heat Energy Systems hot gas to achieve optimal gas flow thru the Dryer System
- It reduces the overall oxygen level within the Dryer System thus making the system safer
- It increases the humidity of the gas stream thus increasing capacity of the gas to carry heat and facilitates the ability of the gas to transfer heat into the center of the wood chips without flash drying the surface
- It reduces volume of gas exhausted to atmosphere or emission control equipment
- It improves energy efficiency by about 25%

The design of the Blending Bustle is critical to good operation of the Dryer System. The re-entry point for the recycle gas is positioned as far away from the Dryer Drum Inlet as possible, giving the gasses time to mix before contacting wet-woody-biomass within the Dryer Drum. The design includes 'jetted-tubes' to create turbulence and promote gas mixing. By achieving well-blended gas ahead of the Dryer Drum inlet many problems associated with "hot streaks" in the gas can be avoided, thus minimizing emissions, fires, and improving quality of dried biomass.

### Design Details

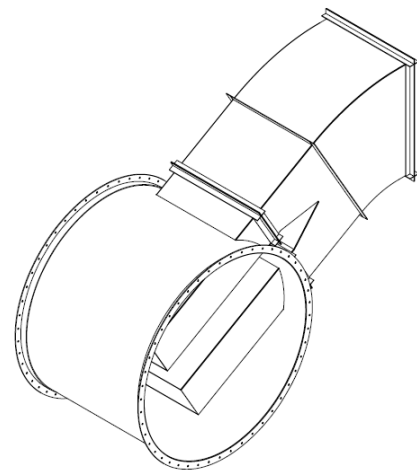
*Materials of construction for chamber: ¼" thick Carbon-Steel.*

*Materials of construction for jetted-tubes: ¼" thick 310-Stainless-Steel.*

*Insulation: Two-layer refractory; low density layer with hard refractory face containing about 40% aluminum oxide.*

*Note: Refractory design by TSI; supply/installation/cure-out offered under Refractory Works option below within this document.*

3D view of the recycle duct connecting to the Dilution Bustle; shown within the Dilution Bustle are the 'jetted-tubes' that create turbulence and promote gas mixing prior to Dryer Drum



## Inlet Fitting

### Purpose

*To act as a conduit for the transition of the homogeneous drying gas from the Blending Bustle into the Dryer Drum, and for the introduction of the wet-woody-biomass into the Dryer Drum.*

### Operation

The Inlet Fitting is a steel duct section with a flange mount for the Infeed Airlock, a louvered chute for the incoming material, tapped ports for injection nozzles, an access door, and a flange mount for the Dryer Drum Inlet Seal. The drying gas passes through the Inlet Fitting into the Dryer Drum. The louvered material chute angles down from the discharge of the Infeed Airlock through the gas stream delivering material into the throat of the Dryer Drum. The drying gas passes through the louvered chute also creating mixing turbulence. There are misting nozzles located within the Inlet Fitting; these provide the Dryer Operator with flexibility to simulate drying load.

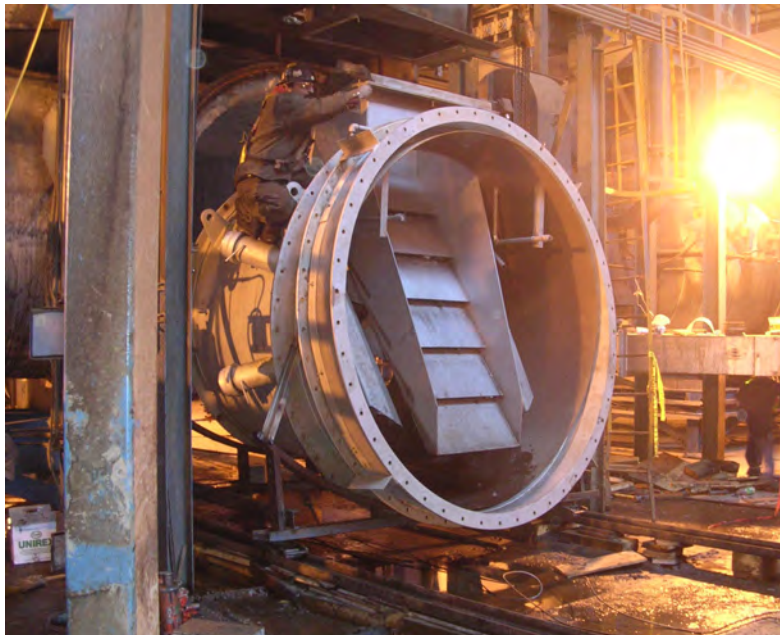
### Design Details

*Materials of construction: ¼" thick Carbon-Steel.*

*Fittings:* For pressure taps, cool-down or artificial load mist nozzles, and deluge nozzles as required by the fire suppression and system control schemes.

*Insulation:* Two-layer refractory; low density layer with hard refractory face containing about 40% aluminum oxide.

*Note: Refractory design by TSI; supply/installation/cure-out offered under Refractory Works option below within this document.*



Front view of the Inlet Fitting showing the louvered chute and cool-down nozzles

## Purge Fan

### Purpose

*To purge combustible gas from the Dryer System in order to prevent explosions and fires.*

### Operation

During a power outage the fuel in the Heat Energy System will continue to smolder, as well as any 'pitch' buildup or biomass that may have accumulated within the Dryer System. This smoldering has the potential to fill up the Dryer System with combustible gas, which upon startup of the system, can cause an explosion due to fresh oxygen that is injected along with sparks coming from the Heat Energy System. To prevent this from occurring, the Purge Fan is connected to the Buyer's Back-up Power Generator and it turns on automatically when the main Dryer System ID Fan is offline. The Purge Fan injects fresh air into the system and purges any combustible gasses from the Dryer System via the Dryer System Abort Stack.



Purge Fan shown at grade level and with connecting duct to the Dryer System's Hot Gas Ductwork

## Dilution Duct Isolation Gate

### Purpose

*To prevent hot gas entering the Dryer System back-wards via the dilution duct.*

### Operation

The Dilution Duct Isolation Gate is located in the dilution duct just prior to the Dilution Bustle. The Dilution Duct Isolation Gate is in the open position during normal operation. Under upset operating conditions and when the ID Fan stops, the Dilution Duct Isolation Gate will close and prevent hot gas from entering the back end of the Dryer System (the ID Fan, the Abort Stack, Cyclones, etc.). The Dilution Duct Isolation Gate comes equipped with a seal fan. The seal fan will pressurize the gate so hot gas cannot go around the metallic plate that make-up the Dilution Duct Isolation Gate. The seal fan will also purge free the dilution duct of potential for combustible gas buildup.

### Design Details

*Materials of construction:* Housing assembly is fabricated from Carbon-Steel plate for housing, with structural shapes for reinforcing; gate assembly is constructed from ¼" thick Carbon-Steel reinforced floating structure.

*Actuator:* Twin hydraulic cylinders powered by a dedicated hydraulic power-pack and mounted external to the housing.

*Seals:* Seal fan.



Dilution Duct Isolation Gate just prior to the Dilution Bustle



## Metering Bin

### PURPOSE

*To receive wet-woody-biomass from the Buyer, store that material, and meter wet material to the Conveyor.*

### OPERATION

The Metering Bin is located at grade level. The Buyer is responsible for feeding wet-woody-biomass into the Metering Bin; the Buyer is responsible for structurally supporting the Buyer's infeed conveyor due to Metering Bins structural inability to support the said infeed conveyor. The Metering Bin contains augers at bin bottom that are driven by variable frequency drives. These augers feed/meter biomass one the Conveyor. Above the augers is an agitator that distributes biomass evenly across the augers to ensure proper and constant feed.

### DESIGN DETAILS

*Materials of Construction:*  
3/16" thick Carbon-Steel for round silo; 304-Stainless-Steel for bottom ten (10) feet of the round silo contacting wet-woody-biomass; 304-Stainless-Steel base plate.

*Augers:* 3/8" thick 304-Stainless-Steel for housing and flights; 304-Stainless-Steel for pipe.

*Rotor Discharge:* 304-Stainless



# Conveyor

## Purpose

*To receive wet-woody-biomass from the Metering Bin and convey that wet-woody-biomass into the Infeed Airlock.*

## Operation

The Conveyor receives wet-woody-biomass from the Metering Bin and conveys that biomass to the Infeed Airlock. The Conveyor is VFD driven and speeds up and slows down based on Metering Bin feed rate.

## DESIGN DETAILS

*Type:* Drag-Chain design.

*Drive:* Direct coupled electric motor with gear reducer.

*Materials of construction:* Stainless-Steel for sides and top plate; bottom plate AR400; flights AR400.

*Capacity:* 300,000 lbs/hr @ 50% moisture content.

*Fittings:* To receive a speed switch.



Typical Drag-Chain Conveyor

## Infeed Airlock

### Purpose

*To receive wet-woody-biomass from the Conveyor and discharge it onto the louvered chute of the Inlet Fitting.*

### Operation

The Infeed Airlock comprises a formed machined steel body with a rotating vane. The vane has eight pockets with knife tips. The design loading is based on achieving the optimum balance between minimizing the introduction of ambient air into the system and creating a maximum, non-plugging load in each pocket.

### DESIGN DETAILS

*Type:* Eight-pocket, rotating vane; low-leakage, knife type.

*Drive:* Direct coupled electric motor with gear reducer.

*Materials of construction:* Carbon-Steel body with Brass tips.

*Fittings:* To receive a speed switch that monitors the rotation of the airlock.



Feeder-type Airlock shown installed and operating with direct coupled drive



## Dryer Drum

### Purpose

*To receive wet-woody-biomass and drying gas, expose wet-woody-biomass to the drying gas in an efficient manner, and discharge flue-gas and dried material into the material duct.*

### Operation

The Dryer Drum consists of three major subassemblies: the drum, the trunnions, and the drive.

The drum is a cylindrical structure formed of rolled mild steel plate, reinforced with structural section channel, tee, and angle ribs, and external bands. The drum rides on two full diameter forged tracks. Drum's interior is a network of lifting flights and baffles, designed to shower material across the drum's cross-section as it rotates and to regulate the forward movement of material through the drum. Around the circumference of the drum are mounted segmented chain teeth sets, on which a roller chain rides. Drum rotation is affected by an electric motor and a gear reducer.

Drum's tires are supported on four trunnion wheels, arranged in opposed pairs at the two track locations. Each trunnion is cast and machined from nodular iron, with shafts riding in split pillow-block spherical roller bearings. Rear trunnion wheels are flanged to fix the location of the drum.

Seals are located at both ends of the drum and are designed to limit ambient air infiltration. Seals are mounted to adapter-taper fittings to insure alignment. Drive chain, trunnions wheels, and tracks are lubricated. The drum is clad with a corrugated skin, which creates an air gap that acts as an effective insulator.



Shown Ø13'x60' long Dryer Drum  
(inboard location of tracks for reduced stress on the shell, the reinforcing channels throughout, and oversized trunnion wheels & tracks for long service life)

## Design Details

### DRUM

*Materials of construction:* 3/8" thick A572-Grade 50 Carbon-Steel plate for drum wall, with formed and welded channel structural members to reinforce the high strength weldment, using 3/4" angle iron flanges to connect the sections. Forged tires are machined for bolted connection to the drum sections.

*Drum rotational drive:* NEMA B electric motor and parallel-shaft gear reducer.

*Drum backup drive:* A backup drive is provided to rotate the Drum during power outage situations.



Typical Dryer Drum section – pictured during installation  
(note the 'open' flighting within the Drum; the flighting promotes chip individualization so each particle moves thru the Drum at its own pace; the open design also provides for easier maintenance as maintenance personnel can walk thru the length of the Drum)



## TRUNNIONS

*Type:* Flat/flanged couple; idling.

*Materials of construction:* ASTM grade 60 cast nodular iron for wheels, mounted on mild steel base weldment structures.

*Bearings:* Pillow blocks with split housings; spherical, self-aligning roller elements.



## SEALS

*Type:* Fiberglass belt with spring steel plates for support.



## INSULATION

*Type:* Galvanized corrugated sheet metal with air gap between sheet metal and drum shell; insulation is designed by TSI, supplied/installed by the Buyer.

## LUBRICATION

*Type:* Oiler.

## SAFETY GUARDS

*Type:* Track guards that cover drum's tracks and trunnion wheels.

## Ductwork

### Purpose

*To convey dried biomass and spent gas from the Dyer Drum discharge to the High Efficiency Cyclone(s), and to convey spent gas from the High Efficiency Cyclone(s) discharge to the ID Fan, and from the ID Fan either to the Dilution Bustle and Exhaust Stack (or Wet Electrostatic Precipitator).*

### Operation

The Ductwork is made from rolled Carbon-Steel. There are two (2) types of ducts: the material duct that conveys both spent gas and dried biomass and gas duct that conveys spent gas only. The material duct runs from the Dryer Drum discharge to the High Efficiency Cyclone(s) inlet. The gas duct runs from the High Efficiency Cyclone(s) discharge to the ID Fan, and from the ID Fan to the Dilution Bustle and to the Exhaust Stack or the Wet Electrostatic Precipitator.

### DESIGN DETAILS

*Type:* Rolled Carbon-Steel with flanged connections.

*Materials of Construction:*  $\frac{1}{4}$ " thick for material duct and  $\frac{3}{16}$ " for gas duct.

*Elbows within Material Duct:*  $\frac{1}{2}$ " thick T1.

*Expansion Joints:* Corrugated Stainless-Steel.



Typical corrugated Stainless-Steel Expansion Joints

## Double-Duct

### Purpose

*To keep inner walls of the Ductwork's gas ducts hotter than the condensable temperature of the complex hydrocarbons that evaporate from biomass during the drying process, thus prevent 'pitch' buildup.*

### Operation

The Double-Duct keeps the 'inner' walls of the gas duct hotter than the condensable temperature of complex hydrocarbons that evaporate from biomass during the drying process. This prevents hydrocarbons from condensing onto the 'inner' walls of the gas duct, which is commonly in the industry referred to as 'pitch' buildup. Pitch buildup is prone to fires, explosions, and while it accumulates it gradually reduces production capability of the Dryer Island due to restricting gas flow. It is costly and time consuming to manually clean 'pitch' buildup. Double-Duct does not completely eliminate 'pitch' buildup and manual cleaning is still necessary but at reduced intervals. Double-Duct is heated via Air-to-Air Heat Exchanger and is backed up by an Electrical Heater.

### Zones:

- 1) Gas duct from Cyclone(s) discharge to ID Fan inlet
- 2) Abort Stack from bottom level to Abort Damper

### Design Details

*Materials of Construction: 3/16" Carbon-Steel.*



Typical double-duct; please note the inner duct and outer duct



## High Efficiency Cyclone(s)

### Purpose

*To separate dried biomass from the flue-gas and deliver dried biomass into Cyclone Airlock(s).*

### Operation

The High Efficiency Cyclone(s) accepts flue-gas and dried biomass from the incoming material duct. The inlet geometry features a tangential transition to the tub section with inlet angle between material duct and transition of fifteen (15) degrees. The Cyclone bottom cone is a relatively shallow angle for better efficiency at removing smaller particulate from the flue-gas. At the exit of the cone there is an oversized vortex breaker with anti-spin baffles to effectively stop the cyclonic action of the dried biomass and to evenly distribute dried biomass into Cyclone Airlock pockets, thus minimizing the risk of plugging and wear on the tips of the Cyclone Airlock. Flue-gas is drawn from the top of the Cyclone and into the gas duct. Explosion relief panels are located on top of the Cyclone.

### Design Details

**Access:** A door on the gas inlet and gas outlet of the Cyclone.

**Explosion Panels:** NFPA certified explosion panels located at top of each Cyclone.

Cyclones are positioned directly on top of the Buyer's Fire Dump; underneath each Cyclone is a Cyclone Airlock; under Cyclone Airlocks are Collection Screws that process biomass under normal operating conditions to Buyer's process conveyor; under upset operating conditions Collection Screws reverse direction to dump biomass to Buyer's Fire Dump.





Oversized vortex breakers underneath the Cyclones



## Cyclone Airlock

### Purpose

*To receive dried biomass from the High Efficiency Cyclone and discharge dried biomass to the Collection Screw.*

### Operation

The Cyclone Airlock comprises a formed machined steel body with a rotating vane. The vane has eight pockets with knife tips. The design loading is based on achieving the optimum balance between minimizing the introduction of ambient air into the system and creating a maximum, non-plugging load in each pocket.

*Note: each Cyclone has a dedicated Cyclone Airlock*

### Advantages

- Lower emissions (any ambient air leakage upwards through the Cyclone Airlock will lift particulate removed by the Cyclone and exhaust to the WESP)
- Lower WESP loading (lower dust loading onto the WESP will result in less maintenance)
- Lower Dryer System operating oxygen levels (any ambient air leaked into the Dryer System will result in higher operating oxygen levels, which is detrimental for fires and sparks)
- Lower maintenance (knife tips are typically adjusted once/year, whereas rubber tips need to be replaced at least twice/year)

### Design Details

*Type:* Eight-pocket, rotating vane; low-leakage, knife type.

*Drive:* Direct coupled electric motor with gear reducer.

*Materials of construction:* Carbon-Steel body with Brass tips.

*Fittings:* To receive a speed switch that monitors the rotation.



Cyclone Airlock underneath the vortex breaker operating with a direct coupled drive



## Collection Screw

### Purpose

*To collect dried biomass from the Cyclone Airlock(s), and process dried biomass to the Buyer's take-away conveyor during normal operating conditions or to the Buyer's Fire Dump during upset operating conditions.*

### Operation

The Collection Screw is located underneath the Cyclone Airlock(s) and receives dried biomass from the Cyclone Airlock(s). The Collection Screw conveys biomass to the Buyer's take-away conveyor during normal operating conditions. During upset operating conditions the Collection Screw will reverse direction and dump biomass directly into the Buyer's Fire Dump. The tower holding the Cyclone(s), Cyclone Airlock(s), and the Collection Screw, is located directly on top of the Buyer's Fire Dump.

### Design Details

*Drive:* Direct coupled electric motor with gear reducer.

*Materials of construction:* ½" thick Carbon-Steel body with ½" thick Carbon-Steel for screw.



Shown in the picture is the entire assembly of the Cyclones, Cyclone Airlocks, and Collection Screw all located direction above the Buyer's Fire Dump.

## ID Fan

### Purpose

*To provide the motive force and requisite pressures through the Dryer System.*

### Operation

The ID Fan is positioned at grade level after the High Efficiency Cyclone and connects to Gas Ductwork on both the inlet and the outlet sides. It draws gas through the entire Dryer System prior to the inlet and then forces some gas back into the Dryer System via the Recycle Bustle and the remainder of the gas to the WESP. There are expansion joints located at both the inlet and the outlet of the ID Fan that accommodate for the thermal expansion of the Gas Ductwork, but also isolate the Ductwork from any potential vibrations originating with the ID Fan. The ID Fan flow is modulated via a Variable Frequency Drive and it is governed by the pressure differential reading across the High Efficiency Cyclones.

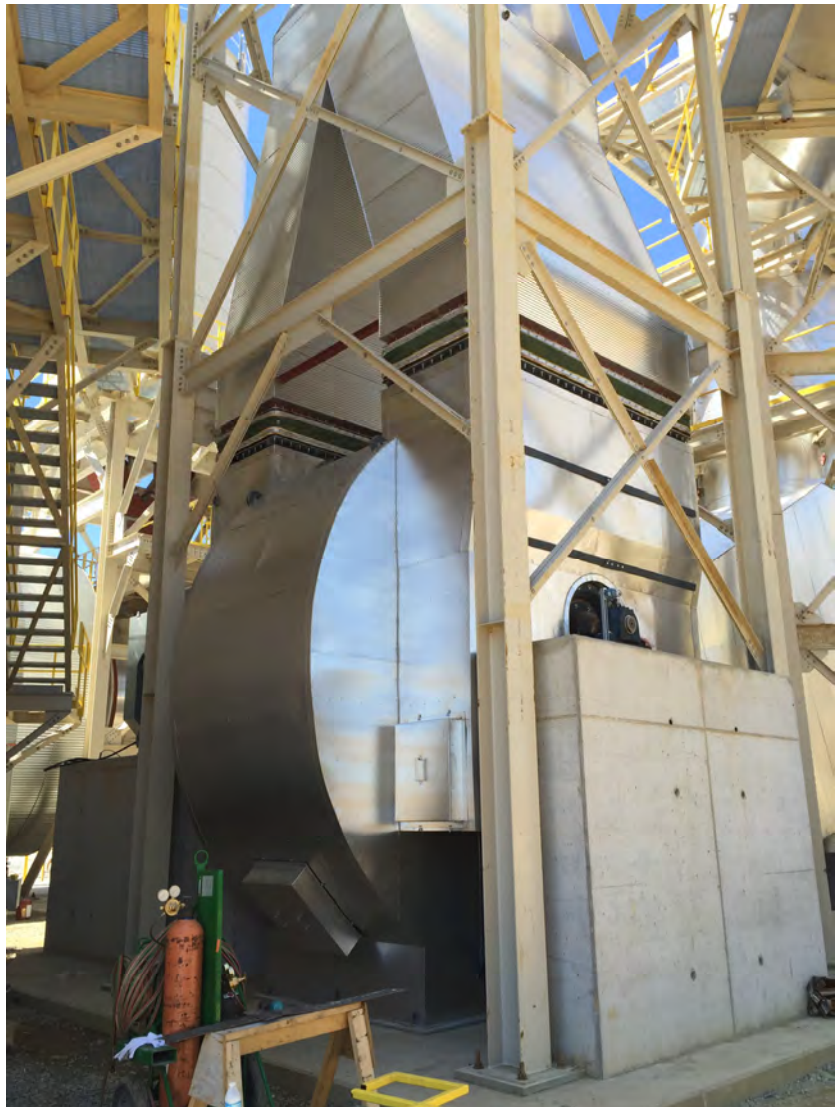
### Design Details

*Type:* Single wheel, double inlet, single outlet, centrifugal, class IV.

*Blade Shape:* Radial Tip.

*Access:* Man-door for maintenance.

Typical ID Fan



## Dilution & Stack Damper

### Purpose

*To control the flow of flue-gas to the Dilution Bustle or to the Pollution Control Equipment.*

### Design Details

*Type: Opposed blade louver.*

*Actuator: BECK actuators.*





## Emergency Abort Stack

### Purpose

*To vent Dryer System flue-gas to atmosphere during upset operating conditions.*

### Operation

At times the Dryer System flue-gas will need to be aborted to atmosphere during upset operating conditions. The Emergency Abort Stack provides the ability to vent gases to atmosphere during upset operating conditions. The control damper is air actuated and is fail safe; if there is a power outage or air failure the Emergency Abort Stack will automatically open.

The Emergency Abort Stack is a 'free-standing-stack'.



## Structural Steel

### Purpose

*To provide structural support for the Dryer System and to provide personnel access via stairs, ladders, and platforms.*

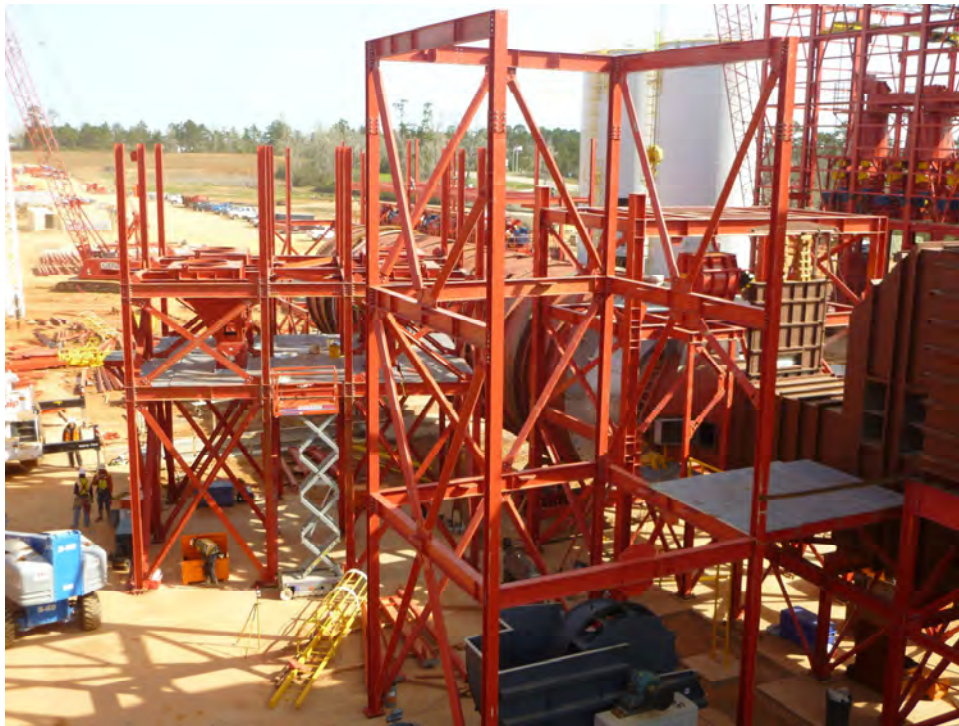
### Description

TSI supplies the support structures, stairs, ladders, and platforms from grade level as is typically required by the Dryer System. This includes access to areas requiring regular maintenance or monitoring by operating personnel. Stair access is provided to areas requiring maintenance on a daily or weekly basis; longer maintenance intervals will have ladder access. Client will have opportunity during system design to comment on access and add more if needed with an appropriate price adjustment.

### Design Details

*Assembly:* Bolted and welded assembly.

*Finish:* Painted.



Typical Structural Steel (shown during construction)

## Control Devices

### Description

The following devices are included in order to control the Dryer System via PLC:

- Temperature Control Sensors
- Temperature Transmitters
- Pressure Transmitters
- Speed Switches
- Proximity Switches (Capacitive and Inductive)
- Plug Detectors
- Deluge Nozzles



Typical quick-disconnect removable nozzle

## Spark Detection and Suppression

### Purpose

*To monitor the Dryer System for sparks and fires, and extinguish those sparks and fires.*

### Operation

The Spark Detection and Suppression monitors various locations within the TSI Dryer System. Deluge nozzles are linked to the spark detection devices and respond appropriately based on input. The deluge works in conjunction with the Collection Screw to abort material to the Buyer's Fire Dump. The Spark Detection and Suppression is integrated into the overall Dryer System controls with audible fire alarm, control panel display, and fire sequence relay.

### Design Details

*Type:* Computerized spark detection and extinguishing system.

*Suppression Equipment:* Water suppression system complete with nozzles, valves, spark sensors, and control logic for automatic and manual operation; deluge valves are supplied that include Y-strainers to clean water from impurities, flow switches to indicate flow, ASCO solenoid valves to actuate flow, with manual by-pass.

#### *Notes:*

*1) Fire detection & suppression by the Buyer.*

*2) TSI will supply Deluge Nozzles for the Dryer System with exception to the fast-acting suppression nozzles located between the Drum & Cyclone(s); Buyer responsible for supplying Deluge Valves (as described above complete with ASCO solenoid, manual by-pass, Y-strainers, and flow switches; heat tracing if required is by the Buyer) as specified by TSI along with pipework from Deluge Valves to the TSI supplied Deluge Nozzles (TSI will only supply Deluge Nozzles along with engineering drawings).*



Typical Spark Detection Equipment at connecting chute



## ITEM 04 WET ELECTROSTATIC PRECIPITATOR (WESP)

*Shown below and on following pages are some of the major individual components that make up the WESP.*

### ***Required Water Quality for the WESP***

The WESP utilizes water and a 50% solution of Sodium Hydroxide (NaOH) to flush out and clean the collection tubes. NaOH is injected directly into the flushing system to assist in the cleaning process. The NaOH injection will drive the pH of the flush water into the basic range (generally in the order of pH 10 – 12). The high pH is an essential element in maintaining clean surfaces within the WESP. By driving pH into basic range,  $\text{CaCO}_3$  will precipitate out of the water causing buildup in the pump, piping, and nozzles. In order to mitigate the amount of hard water buildup in the system it is **required** that the incoming water hardness be at or below the level of “soft water”. Below is a range that describes total water hardness.

- 0-60 ppm  $\text{CaCO}_3$  – soft
- 60-120 ppm  $\text{CaCO}_3$  – moderately hard
- 120-180 ppm  $\text{CaCO}_3$  - hard
- >180 ppm  $\text{CaCO}_3$  - very hard

Total water hardness of water delivered to the WESP should always remain below 60 to ensure trouble free operation.

### ***The Water Treatment System is by the Buyer (below is WESP water requirement):***

- pH: 6 – 8
- Conductivity (uS/cm): <1000
- COD (mg/l): <500
- Suspended Solids (mg/l): <100
- Water Hardness (°dh): <10 (preferably <5)
- Calcium (mg/l): <80 (preferably <40)
- Formaldehyde (mg/l): 0 (limit 10)
- Sulfates  $\text{SO}_4$ : <100
- Chlorides (mg/l): <50

### ***Required NaOH Quality for WESP***

NaOH is manufactured with two distinct methods (Diaphragm and Membrane). Diaphragm grade caustic, while less expensive, has up to 100 times more-free NaCl in the solution. The introduction of NaCl can cause stress corrosion cracking as well as general corrosion on the internal surfaces of the wet ESP.

Membrane grade caustic has less NaCl. It is essential that the NaOH purchased for the WESP is membrane grade in order to prevent damage to the WESP. Additionally, because the recycle water is often sprayed back into the Heat Energy System, or the Dryer System, similar corrosion impacts might be realized there as well.

## Quench-Duct

### Purpose

*The Quench-Duct sprays recycled water into the incoming Dryer System flue-gas stream, thereby saturating and cooling that gas stream to the wet-bulb temperature, and at same time removes larger particulate prior to the WESP.*

### Operation

The Quench-Duct is equipped with recycled water header, sprays, and nozzles to saturate the gas stream and scrub out larger front-half particulate (or filterable particulate) from the gas stream. Saturating the gas stream also allows the WESP to condense and remove some back-half particulate (or condensable particulate); back-half particulate that condenses at temperatures lower than the operating gas stream's wet-bulb temperature will not be captured by the WESP. Scrubbing the larger front-half particulate prior to the WESP allows the precipitator to operate cleaner and have higher efficiency for smaller front-half particulate.

### Design Details

*Design Pressure:  $\pm 25''$  w.c.*

*Materials of Construction: T-304L Stainless-Steel skin/piping/nozzles with Carbon-Steel externals.*



Typical Inlet Quench Duct

## Wet Electrostatic Precipitator

### Purpose

*The Wet Electrostatic Precipitator collects and removes fine particulate from the Dryer System flue-gas stream.*

### Design Details

*Design Pressure:  $\pm 25$ " w.c.*

#### *Inlet Section:*

- 3/16" thick T-304L Stainless-Steel internals with Carbon-Steel externals
- Flooded floor design which eliminates buildup on the bottom surface
- Turning vanes for even distribution of gas stream across tube sections

#### *Collection Section:*

- T-304L Stainless-Steel internals with Carbon-Steel externals
- 14-gauge x  $\varnothing 10$ " collection tubes with 1/4" thick tube sheet
- Carbon-Steel structural supports
- Carbon-Steel vane axial fans (one per tube bundle) to blow ambient air across the tube section, this promotes condensation on the internal surfaces of the collection tubes thus keeping the tube walls wet

#### *Power Grid Housing:*

- 3/16" thick T-304L Stainless-Steel internals with Carbon-Steel externals (stiffeners, brackets, etc.)
- T-304L Stainless-Steel flush header
- T-304L Stainless-Steel collection electrodes (rigid mast with concentric disk electrodes complete with triangular plate alignment mechanism for final alignment)
- T-304L Stainless-Steel power grid that is suspended from outboard porcelain insulators within Purged Insulator Compartments
- T-304L Stainless-Steel Purged Insulator Compartments with integrated purge air system (see further details in proposal), suspension bracket for high voltage insulator, and access hatch for easy access to each insulator.





Wet Electrostatic Precipitator



Power Grid and Discharge Electrodes



Flush Header within the Power Grid



## High Voltage Power Supply

### Purpose

*The High Voltage Power Supply delivers DC rectified high voltage to the electrostatic fields of the WESP.*

### Description

The High Voltage Power Supply and its control panel are included. The Transformer Rectifier (T/R) will be located at the power grid level of the WESP and the control panel will be located in the owner supplied MCC room.

### Design Details

*Type: 3 phase, air cooled.*

*T/R: IP 65 (NEMA 4).*

*Control Panel: IP 54 (NEMA 12) to be located in the Dryer Island E-House.*

*Output Rating: 70 kV; as required milliamps.*

*Input Power: 460 V / 3-phase / 60 Hz.*

*High Voltage Transmission: Pipe in grounded duct.*

*Features: Control Panel with digital controller, KV and MA signal transmitters; remote start/stop function; grounding switch; key interlock system.*



High Voltage Power Supply

## Discharge Duct

### Purpose

*The Discharge Duct conveys particulate cleaned gas stream from top of the WESP to grade level to connect to the downstream RTO.*

### Description

The discharge duct will connect the top of the WESP to the RTO's Mist Eliminator Chamber located at grade level.

### Design Details

*Design Pressure: 25" w.c.*

*Discharge Duct: 3/16" thick T-304L Stainless-Steel internals with Carbon-Steel externals.*



Discharge Duct shown



## Quench Water Recycle

### Purpose

*Quench Water Recycle delivers recycled water to the Quench-Duct and collects all water from the Wet Electrostatic Precipitator, including recycle water draining from the Quench Chamber and spent water and particulate from flushing of the WESP collection tubes.*

### Description

The Quench Water Recycle includes a recycle tank, a recycle pump, valves, strainers and all specialty fittings. The Quench Water Recycle periodically flushes independent electrical fields to wash away collected debris. Recycle water is sprayed (via the recycle pump) into the Quench Duct and spent recycle water will gravity drain back into the recycle tank located beneath the WESP. The Quench Water Recycle is controlled automatically by the Dryer Island PLC control system. Make up water requirements due to evaporation, or blow down, will be satisfied with flush water. PLC programming will control flush sequence based on recycle tank water level.

### Design Details

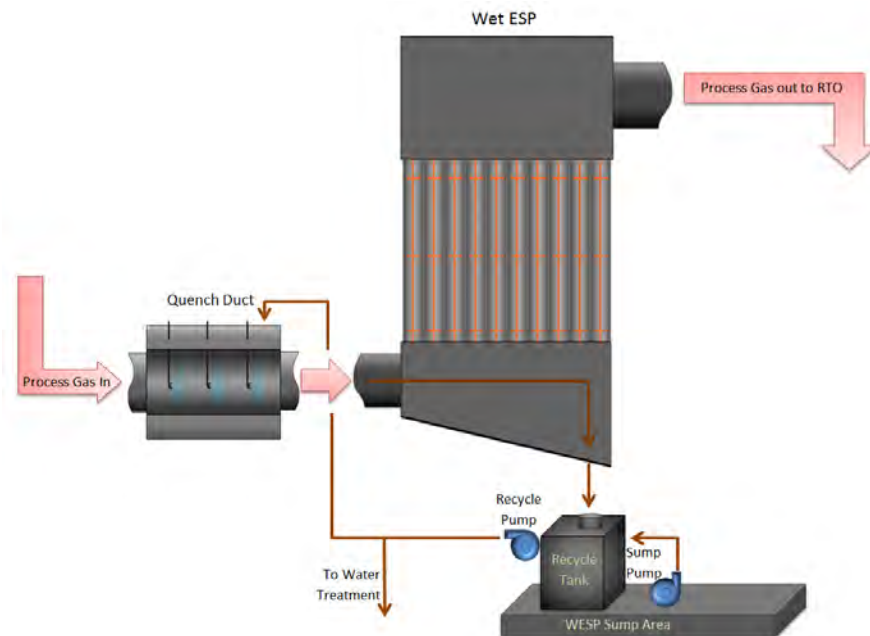
**Recycle Tank:** Rectangular T-304L Stainless Steel tank with water dual jet agitation sprays.

**Recycle Pump:** ANSI centrifugal; T-316L Stainless Steel wet end.

**Sump Pump:** self-priming containment evacuation in the event of a spill.

**Features:** Includes all required nozzles, automatic and manual valves, and an oversized duplex strainer to prevent nozzles from plugging; **piping and general fittings are to be supplied by the installation contractor.**

**Containment Area:** Recycle tank is placed within a concrete curbed area to contain any spills from the tank, pumps, or strainers. The containment area is self-draining to a collection sump where the water can be pumped back into the recycle tank.



## Flush

### Purpose

*Flush delivers hot clean water to the collection tube of the WESP to rinse away collected particulate.*

### Description

Flush includes a flush tank (immersed within the recycle tank for heating purpose), a flush pump, valves, strainers, and all specialty fittings. Flush periodically flushes independent electrical fields to wash away collected debris. Flush is controlled by the PLC and is based on timers. A “pause” timer controls the time between flushes. A “duration” timer controls the duration of the Flush. If the recycle tank cannot accept Flush water the pause timer will be extended to allow evaporation to reduce the level of water within the tank. If the recycle tank is running low on water the pause timer will be advanced and trigger a Flush.

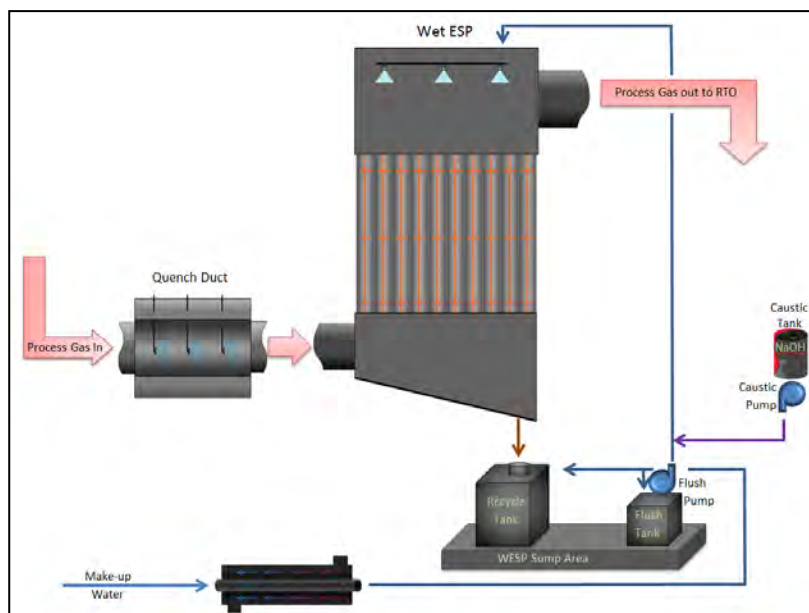
### Design Details

**Flush Tank:** 2000 gallons immersed within the recycle-tank.

**Flush Pump:** Centrifugal style pump sized to deliver appropriate flow and head pressure to flush header and nozzles.

**Nozzles:** T-304L stainless steel maximum passage nozzles; arrangement insures proprietary overlapping pattern above each collection tube to guarantee adequate coverage to all tube surfaces.

**Features:** All required nozzles and internal headers are provided; one feed per WESP unit consisting of heated flush tank immersed in the recycle water for heat transfer purposes and a pump will be supplied; hot water with caustic added is more effective in removing sticky organic deposits from the collection tubes than cold water; **piping and fittings are to be supplied by the installation contractor.**



Typical Flush

## Chemical Injection

### Purpose

*Chemical Injection delivers necessary chemicals (NaOH or Caustic and a defoaming agent) to the Recycle System and Flush System.*

### Description

The Chemical Injection is incorporated into the flush and recycle. Chemical Injection is designed to periodically inject sodium hydroxide (NaOH) directly into the flush water to aid in cleaning of the Wet ESP collection tubes. The flush and caustic systems will be controlled by the Dryer Island PLC. The Chemical Injection is also designed to inject a de-foaming agent into the water recirculation system to control foam when it occurs. The de-foaming system will be controlled at the PLC and also have the capability for manual control. The caustic and de-foaming system will be enclosed in a containment area. TSI will supply a Caustic Tank Pump that will receive and pump caustic from incoming trucks into the tank.

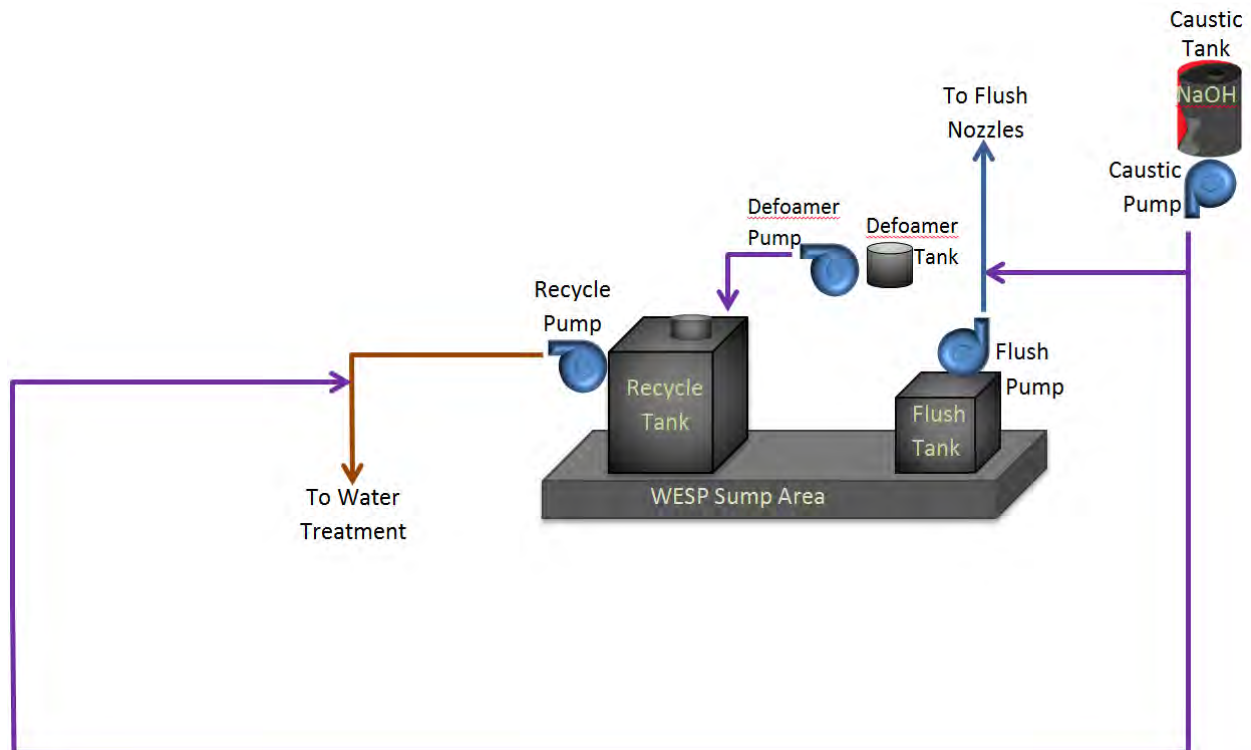
### Design Details

*NaOH Pump:* Gear pump with 2 to 3 gallons per minute capacity (7.5 to 11.25 liters/minute).

*De-foaming Pump:* Gear pump with 2 to 3 gallons per minute capacity (7.5 to 11.25 liters/minute).

*NaOH Tank:* 6,500-gallon cross linked polyethylene with surface heaters.

*De-foaming Agent:* To be determined after startup; totes provided by chemical vendor.



## Purge Air

### Purpose

*Purge Air delivers warm air to the insulator boxes to prevent contamination, which can cause arcing in the insulator boxes that will degrade WESP's performance, from the process gas stream.*

### Description

Purge Air includes a fan, heaters, and a duct network to deliver air to the insulator boxes. The fan will draw air from the outside surface of the tube section. Initially, electric resistance heaters located at each insulator box will be energized to supply the heat necessary to raise the temperature of the purge air. Once the WESP is warmed the heat will be gained from the tube section and the heaters will be de-energized.

### Design Details

*Fan:* Centrifugal fan capable of supplying 1000 CFM per electrostatic power field

*Heaters:* Four (4) per power field; electric resistance 1.5 kW each



Purge Air Fan shown with connecting insulated ductwork



## Decanter Centrifuge

### Purpose

*Decanter Centrifuge removes solids suspended in the process water, thus reducing concentration of solids in the water, therefore minimizing amount of water blow-down required by the WESP.*

### Description

The Decanter Centrifuge removes solids collected by the WESP. The Decanter Centrifuge is configured to treat a slipstream of up to 50 gallons per minute (187.5 liters/minute) of recycle water from the WESP. The cake produced by the Decanter Centrifuge is approximately 50% solids by weight; this discharge is typically land-filled. The centrate (cleaned water) gravity drains back to the recycle tank. A small blow-down stream of approximately two (2) gallons per minute (7.5 liters/minute) is necessary to control concentration of dissolved solids within WESP's water. The exact amount will be determined after start up based on dissolved solids level.

### Design Details

*Materials of Construction:* 304L-Stainless-Steel for wetted parts.

*Capacity:* 50 gallons per minute (187.5 liters/minute).



## Structural Steel

### Purpose

*To provide structural support for the WESP and to provide personnel access via stairs, ladders, and platforms.*

### Description

TSI supplies the support structures, stairs, ladders, and platforms from grade level as is typically required by the WESP. This includes access to areas requiring regular maintenance or monitoring by operating personnel. Stair access is provided to areas requiring maintenance on a daily or weekly basis; longer maintenance intervals will have ladder access. Client will have opportunity during system design to comment on access and add more if needed with an appropriate price adjustment.

### Design Details

*Assembly:* Bolted and welded assembly.

*Finish:* Painted.

## Piping Materials

*Fresh Water Lines:* threaded black iron

*Chemical Lines (NaOH & Defoamer):* Threaded black iron

*Flush System Lines:* Flanged black iron

*Process Water Lines:* Combination of flanged and threaded T-304 Stainless-Steel

## Control Devices

### Description

The following devices are included in order to control the WESP via PLC:

- Temperature Control Sensors
- Temperature Transmitters
- Zero Speed Switches
- Pressure Transmitters
- Proximity Switches (Capacitive and Inductive)
- Level Indicators
- PH Level Indicators

## ITEM 05 REGENERATIVE THERMAL OXIDIZER (RTO)

*Shown below and on following pages are some of the major individual components that make up the RTO.*

### Mist Eliminator Chamber

#### Purpose

*To remove as much suspended water droplets from the gas stream as possible in order to minimize bed fouling and reduce heat requirement on the RTO burners.*

#### Operation

The Mist Eliminator Chamber slows the incoming gas stream to required velocity to enable the mist eliminator modules to remove water droplets from the incoming gas stream. The modules are of chevron style. The mist eliminator modules are flushed routinely utilizing the WESP flush system and water drains back to the WESP sump.

#### Design Details

*Materials of Construction:* 3/16" thick 304-Stainless-Steel.

*Operational Parameters:*  $\pm 25"$  w.c. @ 150°F.

*Access:* One (1) access door on each side for internal inspection of both leading and trailing side of the modules.

*Flush:* Integrated into WESP Flush and includes leading edge and top-down flushing.



Mist Eliminator Chamber  
(incoming gas stream from the left; discharge into the RTO to the right)



## FD Fan

### Purpose

*To provide the motive force and requisite pressures through the WESP and the RTO.*

### Operation

The FD Fan is controlled by a variable frequency drive (VFD). The FD Fan modulates automatically via the PLC to maintain a static pressure set-point at the inlet to the WESP. The FD Fan induces gas flow thru the WESP and pushes gas flow thru the RTO.

### Design Details

*Materials of Construction:* Stainless-Steel with external Carbon-Steel reinforcing structural members.

*Design Conditions:*

- Flow = Actual flow +10%
- Pressure = Actual Pressure +21%.

*Bearings:* Complete with vibration transmitters and temperature elements.

*Expansion Joints:* Stainless-Steel.



## Inlet Manifold

### Purpose

*The Inlet Manifold distributes process gas to the Diverter Valves.*

### Design Details

*Materials of Construction: 3/16" thick 304-Stainless-Steel.*

*Operational Parameters:  $\pm 25''$  w.c. @ 150°F.*

*Access: One (1) hinged and plug insulated access door for internal inspection.*



Inlet and outlet manifold shown on either side of centered valve

## Poppet Diverter Valves

### Purpose

*To control the flow direction of the flue-gas through the RTO media chambers.*

### Operation

The Poppet Diverter Valves are controlled by timers within the Programmable Logic Controller (PLC). At intervals of approximately three (3) minutes, pairs of Poppet Diverter Valves will simultaneously shift, reversing the flow direction of the process gas through the RTO. This allows the heat recovery beds to alternate between a heat source and a heat sink, thus allowing the RTO to recover approximately 95% of the thermal energy.

### Design Details

*Materials of Construction:* 10-gauge 304-Stainless-Steel.

*Operational Parameters:*  $\pm 25''$  w.c. @ 150°F inlet and 250°F outlet.

*Valve Trim Construction:* Main-disk fabricated from 7-gauge thick Duplex-Stainless-Steel; support-disks fabricated from 10-gauge 304-Stainless-Steel; seat materials are 304-Stainless-Steel; seal arrangement is metal to metal sealing surfaces.

*Access:* One (1) hinged and plug insulated access door for internal inspection of valve and bottom side of the hopper.

*Valve Actuation System:* Parker 2A heavy duty pneumatic cylinder, adjustable end cushions at each end of travel; direct link with Parker linear alignment coupling, inductive proximity switches measuring actual valve shaft position, actuation time is 0.5 to 1.0 second full open to full close; each valve is pre-assembled and pre-wired to junction box.



## Hopper Transitions

### Purpose

*The Hopper Transitions distribute flow evenly to the bottom surface of the heat recovery media.*

### Operation

The Hopper Transitions allow gasses exiting the Poppet Diverter Valve to slow down and spread out evenly across the bottom face of the media bed.

### Design Details

*Materials of Construction: 3/16" thick 304-Stainless-Steel.*

*Operational Parameters:  $\pm 25"$  w.c. @ 150°F inlet and 250°F outlet (excursions up to 600°F during bakeout).*



Typical Hopper Transition



## Heat Recovery Chamber

### Purpose

*To serve as a vessel for the heat recovery media.*

### Operation

The Heat Recovery Chamber houses the heat recovery media that enables the RTO to recover approximately 95% of the thermal energy. The Heat Recovery Chamber also houses the media support structure for the heat recovery media, sometimes referred to as the “cold face”.

### Design Details

*Materials of Construction:* 3/16” thick 304L-Stainless-Steel reinforced outside with Carbon-Steel stiffeners.

*Operational Parameters:* ±25” w.c. @ 150°F inlet and 1500°F outlet; maximum operational temperature 1800°F.

*Media Support Structure:* Laser cut or high-def plasma slotted 316-Stainless-Steel plate (laser cutting or high-def plasma mitigates stress concentration due to cold working); maximum free passage of 70% open area; centered in Heat Recovery Chamber with no direct contact to outside walls; completely floating design to prevent stress concentrations while allowing for thermal expansion.

*Access:* Inspection access to the support structures is through the diverter valve; inspection access to top of heat recovery section is through combustion chamber access.

*Note: Most vendors fabricate Heat Recovery Chamber from Carbon-Steel with mastic lining; when hot spots develop the mastic lining will burn off and leave the internal surfaces unprotected from oxidation long after hot spots are corrected; TSI fabricates Heat Recover Chambers from Stainless-Steel to eliminate this potential issue.*



Media support beams  
'Norton Beam Style'

## Combustion Chamber

### Purpose

*Emissions created by the Heat Energy System and the Dryer System, which were not removed by the WESP, are destroyed within the Combustion Chamber.*

### Operation

The Combustion Chamber houses a natural gas burner that regulates the internal temperatures of approximately 1500°F and greater. The Combustion Chamber is specifically designed to provide a minimum residence time of 0.5 seconds (along the flue-gas flow's "shortest path possible"). The combination of temperature and adequate residence time ensures that majority of the incoming hydrocarbons will be converted to CO<sub>2</sub> and H<sub>2</sub>O. Volatile Organic Compounds (VOCs), Carbon Monoxide (CO), Hazardous Air Pollutants (HAPs), and Back-Half Particulate (BHP) are all destroyed within the Combustion Chamber.

### Design Details

*Materials of Construction: 3/16" thick 304-Stainless-Steel.*

*Operational Parameters: ±25" w.c.; normal operation 1500°F; maximum operational temperature 1800°F.*

*Access: One (1) access door on a davit in each combustion chamber.*

*Note: Most vendors fabricated Heat Recovery Chamber from Carbon-Steel with mastic lining; when hot spots develop the mastic lining will burn off and leave the internal surfaces unprotected from oxidation long after hot spots are corrected; TSI fabricates Heat Recover Chambers from Stainless-Steel to eliminate this potential issue.*



## Outlet Manifold

### Purpose

*The Outlet Manifold collects process gas from the RTO and delivers that process gas to the Exhaust Stack.*

### Design Details

*Materials of Construction: 3/16" thick Carbon-Steel.*

*Operational Parameters:  $\pm 25$ " w.c. @ 450°F.*

*Access: One (1) hinged and plug insulated access door for internal inspection of outlet manifold.*



## Control Dampers

### Purpose

*The Control Dampers gas flow and fresh air flow thru the RTO.*

### Operation

There are three (3) control dampers within an RTO. They are the “blocking”, “fresh air”, and “bleed air” dampers. The blocking and fresh air dampers work together, isolating the RTO from the process gas, and allowing fresh air to enter the RTO. This is required during the burner ignition as well as the warm up cycle of the RTO, which must happen at a reduced airflow. When the blocking damper is closed the fresh air damper will be open and vice versa. The bleed air damper allows the discharge side of the RTO to vent during shutdown and outages; this serves as a vacuum break caused by the stack affect during those situations.

### Design Details

#### *Materials of Construction:*

- Blocking: 304-Stainless-Steel butterfly valve with metal-to-metal seats and Carbon-Steel brackets and stiffeners; controlled by a pneumatic actuator.
- Fresh air: 304-Stainless-Steel butterfly valve with tadpole seats and Carbon-Steel brackets and stiffeners; controlled by a pneumatic actuator.
- Bleed air: Carbon-Steel with tadpole seats and Carbon-Steel brackets and stiffeners; controlled by a pneumatic actuator.



## Exhaust Stack

### Purpose

*To exhaust treated process gas to atmosphere.*

### Design Details

*Materials of Construction:* Carbon-Steel.

*Access:* Sampling platform and ports at EPA required position, ladder from grade to platform, and will be free standing.



## Internal Ceramic Refractory

### Purpose

*To protect the shell of the RTO from high internal temperatures*

### Operation

The Internal Ceramic Refractory is bolted to studs that are welded to the internal surface of the Heat Recovery and Combustion Chambers.

### Design Details

*Heat Recovery Sections:* Minimum six (6) inch thick eight (8) pound density.

*Combustion Chamber:* Minimum eight (8) inch thick eight (8) pound density.

*Type:* Unifrax or equal; anchor-loc spun fiber ceramic modules.

*Attachment Method:* Welded/threaded stud; 304-Stainless-Steel.

*Combustion Chamber Temperature:* 1500°F.

*Maximum Internal Temperature:* 2200°F.

*External Skin Temperature:* ≤150°F at 70°F with 5 mph wind.



## Heat Recovery Media

### Purpose

*The Heat Recovery Media serves as the heat source and the heat sink to provide and store thermal energy provided by the burner system.*

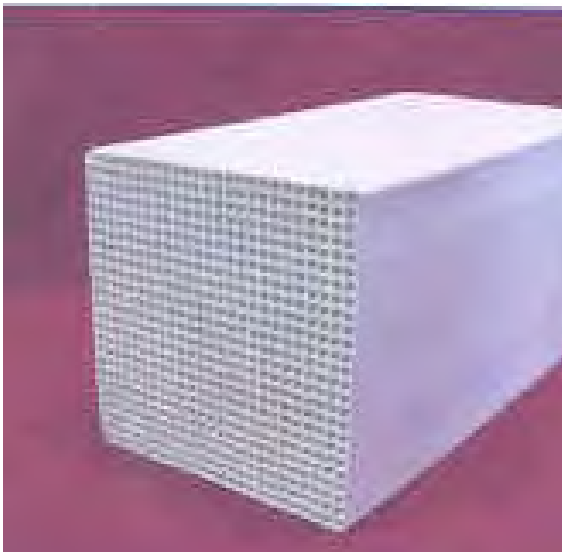
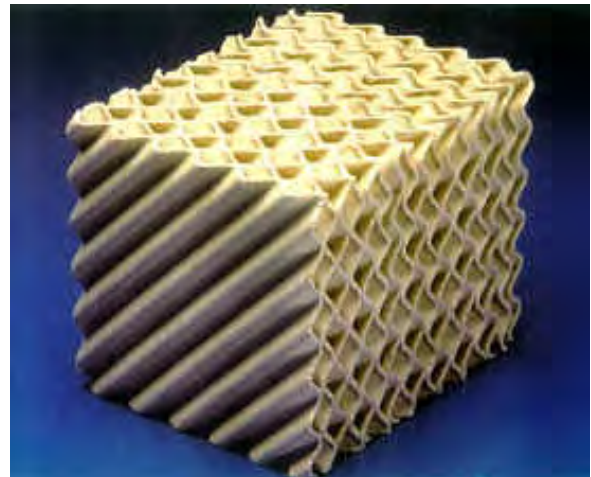
### Operation

The Heat Recovery Media is cycled from the heat source to the heat sink by reversing the flow direction through the RTO. As “cool” process gas enters the “inlet” heat recovery bed the stored thermal energy is transferred and thus preheating the gas stream to within 100°F of the Combustion Chamber temperature. As hot process gas exits the Combustion Chamber the heat is transferred to the “outlet” heat recovery bed thus cooling gas stream to within 100°F of the actual gas stream inlet temperature into the RTO. Every three minutes the flow is reversed thus swapping inlet and outlet beds. The flow reversal is controlled by the Poppet Diverter Valves. There are many types of media available and below are some examples. Please see Equipment Specifications above for details on Heat Recover Media offered for this project.

Random Saddles



Corrugated



Monolith

## Burner

### Purpose

*The Burner provides the necessary heat to maintain the Combustion Chamber temperature set-point.*

### Operation

Operating of the Burner is monitored by a microprocessor-based flame supervisory system manufactured by Honeywell. The flame supervisory system monitors all safety switches and ensures proper purge sequence during start-up. Once the Burner is lit and flame is proven, the supervisory system continues to monitor all safeties but the Burner control is handed to the PLC based control system. The Burner regulates to maintain Combustion Chamber's temperature set-point.

### Design Details

*Burners/Fuel Train/Flame supervisory:*

- Burner - Maxon Kinemax burner
- Combustion Air Blower – Cincinnati or equal
- Fuel Train – Pre-piped and wired to junction box including (1 per RTO):
  - Maxon 5000 shutoff valves with position switches
  - Maxon Microratio (air/gas) proportioning valve with Beck actuator
  - United Electric low and high gas pressure switches
  - Pilot train
  - Scanner cooling air system pre piped
- Flame supervisory including:
  - Honeywell burner management
  - Honeywell UDC2000 high limit switches
  - Self-checking UV scanner
  - Dwyer pressure switches for proof of RTO and media bed minimum airflow

## **Structural Steel**

### **Purpose**

*To provide structural support for the RTO and to provide personnel access via stairs, ladders and platforms.*

### **Description**

TSI supplies the support structures, stairs, ladders, and platforms from grade level as is typically required by the RTO. This includes access to areas requiring regular maintenance or monitoring by operating personnel. Typically, stair access is provided to areas requiring maintenance on a daily or weekly basis. Longer maintenance intervals will have ladder access.

### **Design Details**

*Assembly:* Bolted and welded assembly.

*Finish:* Painted.

## **Control Devices**

### **Description**

The following devices are included in order to control the RTO via PLC:

- Temperature Control Sensors
- Temperature Transmitters
- Zero Speed Switches
- Pressure Transmitters
- Proximity Switches (Capacitive and Inductive)
- Flame Scanner(s)



## ITEM 06 REGENERATIVE CATALYTIC OXIDIZER (RCO)

*Shown below and on following pages are some of the major individual components that make up the RCO.*

### Quench-Duct

#### Purpose

*The Quench-Duct sprays recycled water into the incoming Pelletizing Island flue-gas stream, thereby increasing the weight of the particles and allowing for their removal within the Disengagement Chamber.*

#### Operation

The Quench-Duct is equipped with recycled water header, sprays, and nozzles to saturate the gas stream and scrub out larger front-half particulate from the gas stream. The Quench-Duct also increases weight of smaller particulate to enable for its removal within the Disengagement Chamber.

#### Design Details

*Design Pressure:  $\pm 25''$  w.c.*

*Materials of Construction: T-304L Stainless-Steel skin/piping/nozzles with Carbon-Steel externals.*





## Disengagement Chamber

### Purpose

*The Disengagement Chamber separates (by spinning out) water droplets and large dust particles from the gas stream prior to entry into the RCO.*

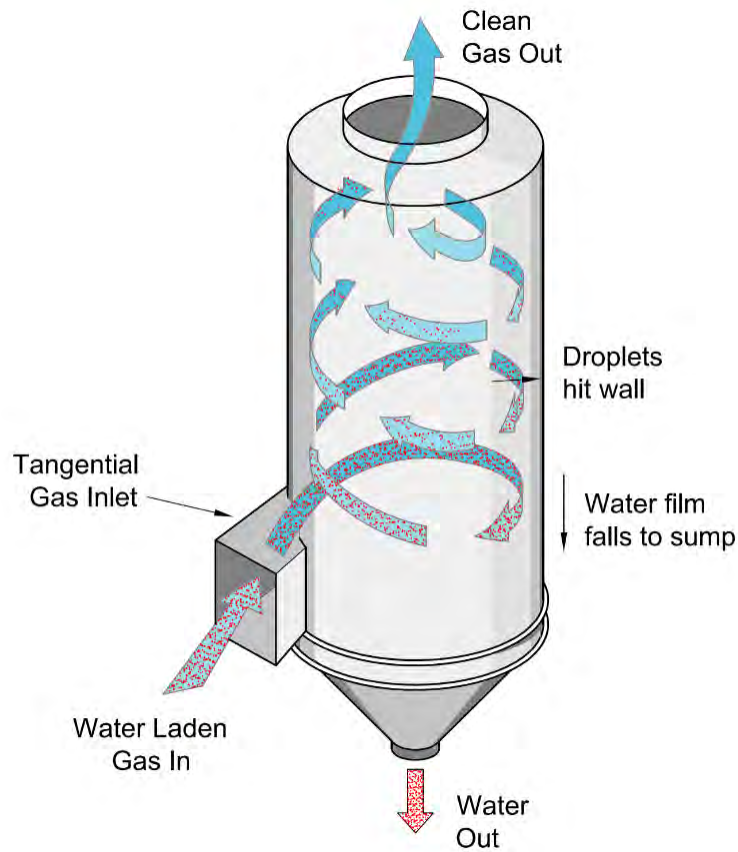
### Description

One Complete disengagement chamber will be provided. The units will be complete with a tangential inlet and integral cone bottom which will serve as a recycle tank for the recycle system.

### Design Details

*Materials of Construction: 304-Stainless-Steel.*

*Design Pressure: +/- 25" w.c.*



## Quench Water Recycle

### Purpose

*The Quench Water Recycle collects water from the Disengagement Chamber and delivers recycled water to the Quench-Duct.*

### Description

This Quench Water Recycle includes a recycle tank, a recycle pump, valves, strainers and all specialty fittings. Recycle water is sprayed via the recycle pump into the Quench-Duct and spent recycle water gravity drains back into the recycle tank. The Quench Water Recycle is controlled automatically by the PLC control system. Make up water requirements due to evaporation or blow down are satisfied with incoming fresh water.

### Design Details

*Recycle Tank:* T-304L Stainless Steel, cone bottom.

*Recycle Pump:* ANSI centrifugal; T-316L Stainless Steel wet end.

*Sump Pump:* Self-priming containment evacuation in the event of a spill.

*Features:* Includes all required nozzles, automatic and manual valves, and an oversized duplex strainer to prevent nozzles from plugging; **piping and general fittings are to be supplied by the installation contractor.**

*Containment Area:* Recycle tank is placed within a concrete curbed area to contain any spills from the tank, pumps, or strainers. The containment area is self-draining to a collection sump where the water can be pumped back into the recycle tank.

## Water Treatment

### Purpose

*Water Treatment manages levels of suspended and dissolved solids within the recycle tank.*

### Description

The Water Treatment consists of a decanter style Centrifuge for continuous removal of suspended particulate. Recycle water is routed to the Centrifuge where collected dust from the Disengagement Chamber is separated and emptied into a Buyer's tote. The Centrifuge minimizes amount of water blow-down required to maintain optimal levels of solids within the water, however some blow-down is still required. The blowdown water will be routed to the Furnace and Dryer System. By discharging a small amount of water, the dissolved solids are removed from Quench Water Recycle.

### Design Details

*Materials of Construction: 304L-Stainless-Steel for wetted parts.*

*Capacity: 50 gallons per minute (187.5 liters/minute).*



## FD Fan

### Purpose

*To provide the motive force and requisite pressures through the Quench-Duct, Disengagement Chamber, and the RCO.*

### Operation

The FD Fan is controlled by a variable frequency drive (VFD). The FD Fan modulates automatically via the PLC to maintain a static pressure set-point at the inlet to the Quench-Duct. The FD Fan induces gas flow thru the Quench-Duct and the Disengagement Chamber and pushes that gas flow thru the RCO.

### Design Details

*Materials of Construction:* Stainless-Steel with external Carbon-Steel reinforcing structural members.

*Design Conditions:*

- Flow = Actual flow +10%
- Pressure = Actual Pressure +21%.

*Bearings:* Complete with vibration transmitters and temperature elements.

*Expansion Joints:* High temperature fabric.



## Inlet Manifold

### Purpose

*The Inlet Manifold distributes process gas to the Diverter Valves.*

### Design Details

*Materials of Construction: 3/16" thick 304-Stainless-Steel.*

*Operational Parameters:  $\pm 25''$  w.c. @ 150°F.*

*Access: One (1) hinged and plug insulated access door for internal inspection.*



Inlet and outlet manifold shown on either side of centered valve



## Poppet Diverter Valves

### Purpose

*To control the flow direction of the flue-gas through the RCO media chambers.*

### Operation

The Poppet Diverter Valves are controlled by timers within the Programmable Logic Controller (PLC). At intervals of approximately three (3) minutes, pairs of Poppet Diverter Valves will simultaneously shift, reversing the flow direction of the process gas through the RTO. This allows the heat recovery beds to alternate between a heat source and a heat sink, thus allowing the RCO to recover approximately 95% of the thermal energy.

### Design Details

*Materials of Construction:* 10-gauge 304-Stainless-Steel.

*Operational Parameters:*  $\pm 25''$  w.c. @ 150°F inlet and 250°F outlet.

*Valve Trim Construction:* Main-disk fabricated from 7-gauge thick Duplex-Stainless-Steel; support-disks fabricated from 10-gauge 304-Stainless-Steel; seat materials are 304-Stainless-Steel; seal arrangement is metal to metal sealing surfaces.

*Access:* One (1) hinged and plug insulated access door for internal inspection of valve and bottom side of the hopper.

*Valve Actuation System:* Parker 2A heavy duty pneumatic cylinder, adjustable end cushions at each end of travel; direct link with Parker linear alignment coupling, inductive proximity switches measuring actual valve shaft position, actuation time is 0.5 to 1.0 second full open to full close; each valve is pre-assembled and pre-wired to junction box.



## Hopper Transitions

### Purpose

*The Hopper Transitions distribute flow evenly to the bottom surface of the heat recovery media.*

### Operation

The Hopper Transitions allow gasses exiting the Poppet Diverter Valve to slow down and spread out evenly across the bottom face of the media bed.

### Design Details

*Materials of Construction: 3/16" thick 304-Stainless-Steel.*

*Operational Parameters:  $\pm 25"$  w.c. @ 150°F inlet and 250°F outlet (excursions up to 600°F during bakeout).*



Typical Hopper Transition



## Heat Recovery Chamber

### Purpose

*To serve as a vessel for the heat recovery media.*

### Operation

The Heat Recovery Chamber houses the heat recovery media that enables the RCO to recover approximately 95% of the thermal energy. The Heat Recovery Chamber also houses the media support structure for the heat recovery media, sometimes referred to as the “cold face”.

### Design Details

*Materials of Construction:* 3/16” thick 304L-Stainless-Steel reinforced outside with Carbon-Steel stiffeners.

*Operational Parameters:* ±25” w.c. @ 120°F inlet and 750°F outlet; maximum operational temperature 1800°F.

*Media Support Structure:* Laser cut or high-def plasma slotted 304-Stainless-Steel plate (laser cutting or high-def plasma mitigates stress concentration due to cold working); maximum free passage of 70% open area; centered in Heat Recovery Chamber with no direct contact to outside walls; completely floating design to prevent stress concentrations while allowing for thermal expansion.

*Access:* Inspection access to the support structures is through the diverter valve; inspection access to top of heat recovery section is through combustion chamber access.

*Note: Most vendors fabricate Heat Recovery Chamber from Carbon-Steel with mastic lining; when hot spots develop the mastic lining will burn off and leave the internal surfaces unprotected from oxidation long after hot spots are corrected; TSI fabricates Heat Recover Chambers from Stainless-Steel to eliminate this potential issue.*



Media support beams  
'Norton Beam Style'

## Burner Chamber

### Purpose

*The Burner Chamber maintains temperature of about 800°F within the catalyst media.*

### Operation

The Burner Chamber houses the natural gas burner that maintains internal temperatures off 850°F or greater. At this temperature the Burner Chamber typically is able to maintain a temperature of about 800°F within the catalyst media, within which incoming hydrocarbons will convert to CO<sub>2</sub> and H<sub>2</sub>O.

### Design Details

*Materials of Construction: 3/16" thick 304-Stainless-Steel.*

*Operational Parameters: ±25" w.c.; normal operation 850°F; maximum operational temperature 1800°F.*

*Access: One (1) access door on a davit in each combustion chamber.*

*Note: Most vendors fabricated Heat Recovery Chamber from Carbon-Steel with mastic lining; when hot spots develop the mastic lining will burn off and leave the internal surfaces unprotected from oxidation long after hot spots are corrected; TSI fabricates Heat Recover Chambers from Stainless-Steel to eliminate this potential issue.*



## Outlet Manifold

### Purpose

*The Outlet Manifold collects process gas from the RCO and delivers that process gas to the Exhaust Stack.*

### Design Details

*Materials of Construction: 3/16" thick Carbon-Steel.*

*Operational Parameters:  $\pm 25$ " w.c. @ 450°F.*

*Access: One (1) hinged and plug insulated access door for internal inspection of outlet manifold.*

## Control Dampers

### Purpose

*The Control Dampers gas flow and fresh air flow thru the RCO.*

### Operation

There are three (3) control dampers within an RTO. They are the “blocking”, “fresh air”, and “bleed air” dampers. The blocking and fresh air dampers work together, isolating the RTO from the process gas, and allowing fresh air to enter the RTO. This is required during the burner ignition as well as the warm up cycle of the RTO, which must happen at a reduced airflow. When the blocking damper is closed the fresh air damper will be open and vice versa. The bleed air damper allows the discharge side of the RTO to vent during shutdown and outages; this serves as a vacuum break caused by the stack affect during those situations.

### Design Details

#### *Materials of Construction:*

- Blocking: 304-Stainless-Steel butterfly valve with metal-to-metal seats and Carbon-Steel brackets and stiffeners; controlled by a pneumatic actuator.
- Fresh air: 304-Stainless-Steel butterfly valve with tadpole seats and Carbon-Steel brackets and stiffeners; controlled by a pneumatic actuator.
- Bleed air: Carbon-Steel with tadpole seats and Carbon-Steel brackets and stiffeners; controlled by a pneumatic actuator.



## Exhaust Stack

### Purpose

*To exhaust treated process gas to atmosphere.*

### Design Details

*Materials of Construction:* Carbon-Steel.

*Access:* Sampling platform and ports at EPA required position, ladder from grade to platform, and will be free standing.





## Internal Ceramic Refractory

### Purpose

*To protect the shell of the RCO from high internal temperatures*

### Operation

The Internal Ceramic Refractory is bolted to studs that are welded to the internal surface of the Heat Recovery and Combustion Chambers.

### Design Details

*Heat Recovery Sections:* Minimum six (6) inch thick eight (8) pound density.

*Combustion Chamber:* Minimum eight (8) inch thick eight (8) pound density.

*Type:* Unifrax or equal; anchor-loc spun fiber ceramic modules.

*Attachment Method:* Welded/threaded stud; 304-Stainless-Steel.

*Combustion Chamber Temperature:* 850°F.

*Maximum Internal Temperature:* 2200°F.

*External Skin Temperature:* ≤150°F at 70°F with 5 mph wind.





## Heat Recovery Media & Catalyst

### Purpose

*The Heat Recovery Media serves as the heat source and the heat sink to provide and store thermal energy provided by the burner system.*

### Operation

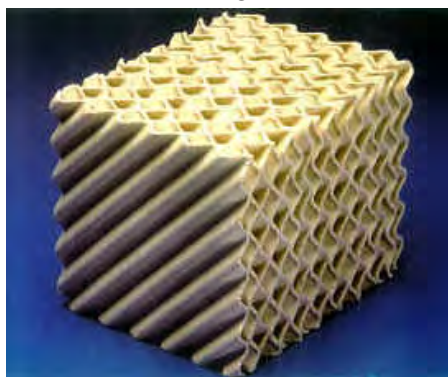
The Heat Recovery Media is cycled from the heat source to the heat sink by reversing the flow direction through the RCO. As “cool” process gas enters the “inlet” heat recovery bed the stored thermal energy is transferred and thus preheating the gas stream to within 50°F of the Combustion Chamber temperature. As hot process gas exits the Combustion Chamber the heat is transferred to the “outlet” heat recovery bed thus cooling gas stream to within 50°F of the actual gas stream inlet temperature into the RCO. Every three minutes the flow is reversed thus swapping inlet and outlet beds. The flow reversal is controlled by the Poppet Diverter Valves. There are many types of media available and below are some examples. Please see Equipment Specifications above for details on Heat Recover Media offered for this project.

A layer (generally 4” thick) of precious metal catalyst will be added to the top of the media bed. Catalyst will allow the conversion of organic vapors to H<sub>2</sub>O and CO<sub>2</sub> to occur at lower temperatures (generally around 800°F). The catalyst will be Applied Catalyst. It comes in 6”x6”x4” tall blocks similar to the monolith media yet coated with the precious metal.

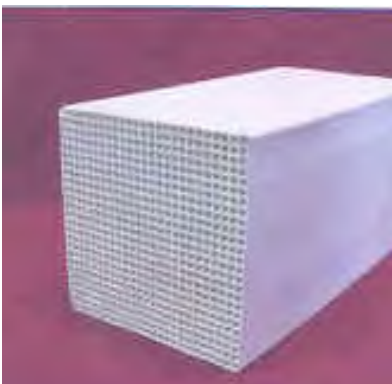
Random Saddles



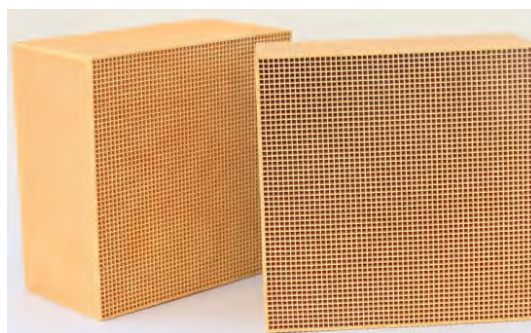
Corrugated



Monolith



Catalyst



## Burner

### Purpose

*The Burner provides the necessary heat to maintain the Combustion Chamber temperature set-point.*

### Operation

Operating of the Burner is monitored by a microprocessor-based flame supervisory system manufactured by Honeywell. The flame supervisory system monitors all safety switches and ensures proper purge sequence during start-up. Once the Burner is lit and flame is proven, the supervisory system continues to monitor all safeties but the Burner control is handed to the PLC based control system. The Burner regulates to maintain Combustion Chamber's temperature set-point.

### Design Details

*Burners/Fuel Train/Flame supervisory:*

- Burner - Maxon Kinemax burner
- Combustion Air Blower – Cincinnati or equal
- Fuel Train – Pre-piped and wired to junction box including (1 per RCO):
  - Maxon 5000 shutoff valves with position switches
  - Maxon Microratio (air/gas) proportioning valve with Beck actuator
  - United Electric low and high gas pressure switches
  - Pilot train
  - Scanner cooling air system pre piped
- Flame supervisory including:
  - Honeywell burner management
  - Honeywell UDC2000 high limit switches
  - Self-checking UV scanner
  - Dwyer pressure switches for proof of RCO and media bed minimum airflow

## **Structural Steel**

### **Purpose**

*To provide structural support for the Quench-Duct, the Disengagement Chamber, and the RCO, and to provide personnel access via stairs, ladders and platforms.*

### **Description**

TSI supplies the support structures, stairs, ladders, and platforms from grade level as is typically required by the RCO. This includes access to areas requiring regular maintenance or monitoring by operating personnel. Typically, stair access is provided to areas requiring maintenance on a daily or weekly basis. Longer maintenance intervals will have ladder access.

### **Design Details**

*Assembly:* Bolted and welded assembly.

*Finish:* Painted.

## **Control Devices**

### **Description**

The following devices are included in order to control the Quench-Duct, the Disengagement Chamber, and the RCO via PLC:

- Level Transmitters
- Temperature Control Sensors
- Temperature Transmitters
- Zero Speed Switches
- Pressure Transmitters
- Proximity Switches (Capacitive and Inductive)
- Flame Scanner(s)

## ITEM 07 SYSTEM CONTROLS

### PURPOSE

*To provide for automatic operation of the Dryer Island and Pelletizing Island RCO.*

### OPERATION

***Automatic operation of the equipment is controlled by four (4) PLCs (L83E programmable Logic Controller) and seven (7) Remote IO Cabinets.*** The operation of the equipment is monitored by the Operator via multiple HMI stations (Human Machine Interface) c/w monitors located in the Buyer's plant control room.

### SCOPE OF SUPPLY

The scope of services covers one (1) Dryer Island that consists of a Heat Energy System, the Dryer System, the WESP, and the RTO; scope of services also covers one (1) RCO. The proposed Control System is based on L83E processor, Flex I/O, and Wonderware Intouch 2014 R2 C/w run time license. The following is the breakdown of scope of services:

- Drawing Lists
- PLC IO & Tag Assignment Lists
- IP Address Assignment Lists
- PLC to PLC Handshake List
- Utility and UPS Power Requirements
- Panel Location Drawings
- Design of Main processor PLC Cabinets and Remote I/O Field Panels
  - o Panel Layout
  - o I/O Schematics
- Coordination and interface with Burner Management System
- Coordination and interface with upstream and downstream PLC systems
- Control Cable List
- Final Record Drawings
- Control System Functional Requirement Document
- PLC Programming and HMI Development
  - o PLC Inputs and Output signals.
  - o Control Loops,
  - o Drive Control Logic,
  - o Interface as required between systems
  - o PLC logic and documentation
  - o Development of HMI screens
  - o In-House Logic Testing
- PLC Network Diagram
- Quality Control
  - o Review P&ID/Motor/Device Lists
  - o PLC/HMI Testing FAT
  - o Panel shop inspections and testing

- FAT & Post Fat Clean-up
- Commissioning Checkout
- Technical liaison with Pinnacle Pellets at TSI offices or offices in Vancouver, BC, Canada
- Attend weekly conference calls with all Stakeholders
- Four (4) main PLC panels: one (1) for the Heat Energy System, one (1) for the Dryer System, and one (1) for the WESP & RTO, and one (1) for the RCO
- Each main PLC panel located in Electrical Room, which has main CPU (1756-83E), communication modules and Flex IO modules.
- Seven (7) Remote Control Panels:
  - Two (2) for the Heat Energy System
  - Two (2) for the Dryer System
  - One (1) for the WESP
  - One (1) for the RTO
  - One (1) for the RCO
  - IO List, including interface with GreCon
  - Panel, Control Cable list
  - PLC Panel layout and BoM
  - IO Schematics and terminal layout.
- Control Narratives.
- PLC program (Studio 5000 Ver. 20).
- Master Alarm List.
- Two Wonderware InTouch HMI Runtime licences program (Wonderware InTouch 2014 R2).
- As-built.
- *Eighty (80) man-days for site service during commissioning & startup; two (2) programmers will be present on site; programming site service to be utilized at same time as Commissioning/Startup Site Service identified below with ITEM Site Service.*
- The current prevailing rate for programming staff is \$2050/person/day and this includes all traveling and out of pocket expenses. A working day is calculated as up to ten (10) hours of onsite time. Travel days to and from site are each considered a working man-day.

## DELIVERABLES

1. PLC Panel Fabrication drawings
2. Motor and Device List & Location
3. PIDs
4. Panel Location Drawings
5. PLC Panel IO Schematics
6. PLC IO List
7. IP Address list
8. PLC to PLC Handshake List
9. Control Cable List
10. Updated control narratives
11. PLC/HMI (Wonderware InTouch) Program & Configuration
12. FAT testing at Cogent Office.
13. Development of Commissioning Plan and Check sheets for PLC/HMI program and IO

14. Site Commissioning of PLC/HMI and IO
15. Final Record Drawings for PLC Panel Layout and IO Schematics

#### ASSUMPTIONS

- All Plant's PLC/HMI tag names based on TSI Numbering System
- PLC/HMI will be provided based on standard implemented at other Pellet Plants in North America
- Control Panel will be based on ControlLogix and Flex IO
- PLC panels will be provided similar to Standard PLC panels installed at other Pellet Plants in North America; each panel will have Flex IO (Rack, power supply, Ethernet adaptors).
- PLC Panel layout diagrams and IO Schematics will be similar to Standard PLC panels installed at other Pellet Plants in North America
- Motor Starters and Drives all come with EtherNet/IP interface.

#### BY OTHERS

- Fuel handling to the Heat Energy System's Metering Bin is by the Buyer
- Feedstock handling to the Dryer System's Metering Bin is by the Buyer
- Dry feedstock handling after the Dryer System's Collection Screw is by the Buyer
- The Buyer will provide main control room to accommodate TSI provided HMI stations



## ITEM 08 SITE SERVICE

- The current prevailing rate for construction staff is \$1450/person/day and this includes all traveling and out of pocket expenses. A working day is calculated as up to ten (10) hours of onsite time. Travel days to and from site are each considered a working man-day.
- The current prevailing rate for commissioning/startup/training staff is \$1450/person/day and this includes all traveling and out of pocket expenses. A working day is calculated as up to ten (10) hours of onsite time. Travel days to and from site are each considered a working man-day.

*Below is recommended Site Service:*

- **Construction Site Service: three-hundred-ninety (390) total man-days**
  - *There are three-hundred-sixty (360) site-service man-days and thirty (30) travel days*
  - *Equipment installation starts from the time 1<sup>st</sup> equipment arrives to site until start of commissioning; TSI estimates this period will last six (6) months; TSI will require two (2) construction supervisors on site at the same time. During this time TSI crews will rotate. Travel days to and from site are each considered a working day*
  - *Down-days for weekends/holidays/weather/or any reasons not related to TSI are considered working days*  
**Price: USD 565,500**
- **Commissioning/Startup Site Service: Eighty-eight (88) total man-days**
  - *There are eighty (80) site-service man-days and eight (8) travel days*
  - *Two (2) TSI staff will be on site*
  - *Down-days for weekends/holidays/weather/or any reasons not related to TSI are considered working days*
  - *Start of commissioning site service is initiated by the Buyer; the Buyer must provide TSI with minimum four (4) week notice prior to the commissioning start date*  
**Price: USD 127,600**
- **24/7 Site Service post Commissioning: two-hundred (200) total man-days**
  - *There are one-hundred-eighty (180) site-service man-days and twenty (20) travel days*
  - *Two (2) TSI staff will be on site for 1<sup>st</sup> thirty (30) days per shift and one (1) TSI staff will be on site for 2<sup>nd</sup> thirty (30) days per shift*
    - *Total support is two (2) months*
  - *Down-days for weekends/holidays/weather/or any reasons not related to TSI are considered working days*
  - *Start of 24/7 Site Service will continue automatically following Commissioning Site Service*  
**Price: USD 290,000**

*Notes:*

- 1) *If additional working days are required by the Buyer, the Buyer can purchase those additional site service days at the rate shown above.*
- 2) *If the Buyer utilizes fewer site service days than the above, TSI will refund each fewer site service day to the Buyer at the rate shown above.*

## ITEM 09 REFRACTORY WORKS

### SCOPE

TSI offers to supply all manpower, lifting and hoisting equipment, and travel and living expenses, to install the refractory on the Heat Energy System and connecting hot gas ductwork between the Heat Energy System and Dryer Drum. TSI refractory installation crews will mobilize to site once Heat Energy System has been installed.

Items included in TSI installation package:

- 1) Heat Energy System refractory supply.
- 2) Heat Energy System refractory anchors supply.
- 3) Dryer System's hot gas ductwork refractory supply.
- 4) Dryer System's hot gas ductwork refractory anchor supply.
- 5) Heat Energy System anchor and refractory installation.
- 6) Dryer System hot gas ductwork anchor and refractory installation.
- 7) Heat Energy System refractory cure-out.
- 8) Dryer System refractory cure-out.
- 9) Refractory installation/cure-out 3<sup>rd</sup> party inspection.
- 10) Confined space area attendants and monitors.

Buyer's Responsibility:

- 1) Temporary electrical power supply and field wiring in the form of a 200 Amp 3-phase 480V power panel for welding machines and refractory cure-out equipment as well as a 110V power panel for electrical tools.
- 2) One (1) inch potable water line at 30 psi minimum stubbed at the installation area of refractory mixing.
- 3) Provide all weather and un-interrupted access to laydown areas for truck access, supplies, as well as storage of the same with suitable structure to support crane and forklift activity during inclement weather.
- 4) Installation of any equipment not listed above.
- 5) Winter package installation; the above installation is based on weather conditions at  $\geq 6^{\circ}\text{C}$ ; if weather is  $< 6^{\circ}\text{C}$  then direct cost of additional items required (heaters/hoarding/fuel/etc.) will be borne by the Buyer with additional 10% added for processing; TSI will provide to Buyer the additional invoices due to winter installation.

*Note: TSI and its sub-contractors are non-union; if unionized work is required then an adjustment to the price will be applied and paid by the Buyer.*

## ITEM 10 EQUIPMENT INSTALLATION

Items included in TSI installation package:

- 1) Receive and unload all TSI equipment; storage/laydown area must be next to Dryer Island (within 50' of the Dryer Island boundaries); if storage/laydown area is not near Dryer Island than appropriate adjustment to price will be made once full impact of storage/laydown area location is determined.
- 2) All mechanical and structural equipment installation relating to the following equipment:
  - a. Heat Energy System
  - b. Dryer System
  - c. WESP
  - d. RTO
  - e. Disengagement Chamber/RCO
- 3) Dryer System Exhaust insulation supply and installation; 4" mineral wool with 0.034" embossed aluminum for cladding; the following equipment will be insulated:
  - a. Material Ductwork from Drum discharge to Cyclones' inlet
  - b. Cyclones
  - c. Gas Ductwork from Cyclones' discharge to ID Fan
  - d. ID Fan
  - e. Process portion of the Abort Stack
  - f. Dilution Ducts
- 4) RTO insulation supply & installation; 4" mineral wool with 0.034" embossed aluminum for cladding.
- 5) RCO insulation supply & installation; 4" mineral wool with 0.034" embossed aluminum for cladding.
- 6) RTO gas piping supply & installation; TSI will specify during engineering the location where Buyer must locate Natural Gas with lockable isolation valve; TSI will specify quantity & pressure at this location; TSI will supply piping & installation from this location to RTO Burner(s).
- 7) RCO gas piping supply & installation; TSI will specify during engineering the location where Buyer must locate Natural Gas with lockable isolation valve; TSI will specify quantity & pressure at this location; TSI will supply piping & installation from this location to RCO Burner(s).
- 8) WESP process piping supply & installation; typical USA process piping specification for Pellet Plants; Buyer to provide water stub-up with lockable isolation valve next the WESP as shown by TSI during the engineering phase of the project.
- 9) RCO Quench-Duct & Disengagement Chamber process piping supply & installation; typical USA process piping specification for Pellet Plants; Buyer to provide water stub-up with lockable isolation valve next the Disengagement Chamber as shown by TSI during the engineering phase of the project.
- 10) Dryer Island WESP & RCO Disengagement Chamber blow-down water to be piped overhead to Furnace/Dryer System.

- 11) Pneumatic instrument air lines supply & installation; the Buyer is required to provide and install the pneumatic air generator as per the Dryer Island & RCO equipment requirements; the location of this unit shall be within the boundaries of the Dryer Island as specified by TSI during the engineering phase of the project; from this generator TSI will supply & install all required pneumatic air lines to the Dryer Island & RCO devices.
- 12) Dryer Drum cladding insulation.
- 13) All hydraulic piping supply and installation and hydraulic oil supply.
- 14) Storage containers for all weather sensitive equipment supplied by TSI.
- 15) TSI will provide its own offices on site.
- 16) Mechanical installation of all TSI supplied devices.
- 17) Supply & install of all valves/piping/switches from the Buyer supplied stub-up pipe to the deluge nozzles located throughout the Heat Energy System and the Dryer System; this excludes if required the fast-acting spark detect piping; piping will be heat traced and insulated; during the engineering portion of this project TSI will specify location to the Buyer near the Furnace and near the Dryer System for the stub-up pipes; stub-ups supplied by the Buyer with manual shutoffs.



Shown above is the stub-up pipe with manual shutoff valve supplied & installed by the Buyer; above the manual valve is supplied and installed by TSI

#### Buyer's Responsibility:

- 1) Provide uninterrupted access to area of equipment installation, laydown areas, and connecting roads between these two areas as well as into the plant; any interruption during construction due to no fault of TSI (e.g. the Buyer shuts down the site due to another vendor's safety infractions, or any other reasons that prevent TSI from working uninterrupted or at lesser efficiency) will be paid by the Buyer; the price for this interruption can only be determined during construction period and once full scope of interruption is realized.
- 2) All underground & inground works to be completed prior to TSI installation crew's

installation start.

- 3) Supply & installation of spark detection (unless Buyer purchases this option from TSI shown within pricing pages).
- 4) Fire water piping supply & installation
- 5) Potable water and 100V power for TSI site office trailers.
- 6) Temporary electrical power supply and field wiring for 480V welding machines and 110V electrical tools.
- 7) Provide all weather and un-interrupted access to laydown areas for truck access, supplies, as well as storage of the same with suitable structure to support crane and forklift activity during inclement weather.
- 8) Toilets, washing area/ and drinking water.
- 9) Any prevention of site access for construction that prevents TSI installation crews from installing equipment.
- 10) Equipment lubrication supply and flushing
- 11) Provide all weather working surfaces around equipment erection area to provide safe access and working surfaces for cranes, man-lifts, and forklifts during inclement weather.
- 12) Creation and repair of roads, site drainage, lay down area, parking, and water service by the Buyer (TSI to hook up water service to its trailer; water hook up to be within reasonable proximity to TSI trailer).
- 13) Installation of any equipment not listed above.
- 14) Any Safety Coordinators if required are by the Buyer.

*Note: TSI and its sub-contractors are non-union; if unionized work is required then an adjustment to the price will be applied and paid by the Buyer.*

## ITEM 11 ELECTRICAL WORKS

### SCOPE

TSI offers to design, supply all manpower, lifting and hoisting equipment, and travel and living expenses, to electrically install and commission the Dryer Island and the RCO, and supply and install the E-House for the Dryer Island and the RCO. During first twenty (20) weeks of engineering TSI will determine the location of the E-House; this building will be located adjacent to the TSI Dryer Island. Deviation by Client from TSI drawings may result in an upcharge; this price impact will be determined once engineering is complete.

Electrical Works supply will be as per the TSI's North American Pellet Plant typical standards; deviation from these standards may reflect in change of price.

#### Items included in TSI installation package:

- 1) Electrical Engineering:
  - a. Prefabricated steel electrical building (E-House)
  - b. Power distribution gear (Panelboards, Transformers, Switchgear, etc.)
  - c. Motor Control (MCCs and MV VFDs)
  - d. All equipment within the E-House is installed, wired, and tested prior to shipment to the Buyer's plant site
    - i. Medium Voltage equipment will be inspected and commissioned onsite prior to plant startup
  - e. E-House comes complete with stairs & platforms, lighting, 32 tons of HVAC cooling, working desk, and power receptacles
  - f. E-House is a two-piece unit that will ship separately and require reconnection at the plant site
    - i. Section 1 will house the Low Voltage Gear (41'6" long by 15' wide)
    - ii. Section 2 will house the Medium Voltage Gear (27' long by 15' wide)
    - iii. Total E-House dimensions are 68'6" long by 15' wide
  - g. Eaton Power Distribution Equipment is supplied (Eaton distribution panels, transformers, LV Switchboard, and MV Switchgear)
  - h. Rockwell Motor Control
    - i. IntelliCENTER MCCs
    - ii. Dryer System ID Fan, the RTO FD Fan, and the RCO FD Fan VFDs are PF7000 MV
    - iii. Recommended spare parts are included
    - iv. Rockwell commissioning services are included (5 days on-site)
  - i. Diesel Backup Power Generator with Automatic Transfer Switch (ATS)
  - j. Four (4) Transformer Rectifiers
  - k. Power/Motor cable list
  - l. Dryer Island and RCO Single Line Diagram and protection coordination and arc flash
  - m. Control cable list
  - n. Final Low Voltage distribution MCC review



- o. Motor O/L and drive configuration reviews
  - p. Uninterrupted Power System & Distribution Panels
  - q. Electrical Distribution Panels
  - r. Cable Tray Layout
  - s. Heat loss calculations review on E-house
  - t. LDS requirements
  - u. BOP electrical requirements
  - v. MCC, motor schematics reviews
- 2) Prefabricated steel electrical building (E-House)
    - a. Power distribution gear (Panelboards, Transformers, Switchgear, etc.)
    - b. Motor Control (MCCs and MV VFDs)
    - c. All equipment within the E-House is installed, wired, and tested prior to shipment to the Buyer's plant site
      - i. Medium Voltage equipment will be inspected and commissioned onsite prior to plant startup
    - d. E-House comes complete with stairs & platforms, lighting, 32 tons of HVAC cooling, working desk, and power receptacles
    - e. E-House is a two-piece unit that will ship separately and require reconnection at the plant site
      - i. Section 1 will house the Low Voltage Gear (41'6" long by 15' wide)
      - ii. Section 2 will house the Medium Voltage Gear (27' long by 15' wide)
      - iii. Total E-House dimensions are 68'6" long by 15' wide
    - f. Eaton Power Distribution Equipment is supplied (Eaton distribution panels, transformers, LV Switchboard, and MV Switchgear)
    - g. Rockwell Motor Control
      - i. IntelliCENTER MCCs
      - ii. Dryer System ID Fan & RTO ID Fan VFDs are PF7000 MV
      - iii. Recommended spare parts are included
      - iv. Rockwell commissioning services are included (5 days on-site)
  - 3) Diesel Backup Power Generator with Automatic Transfer Switch (ATS)
  - 4) Four (4) Transformer Rectifiers
  - 5) Integration/wiring of TSI supplied PLC enclosures
  - 6) Supply and installation of network equipment for operator control room (CISCO compatible)
  - 7) Supply and install all of the Dryer Island motors
  - 8) TSI supplied starters will be installed in a prefabricated building in a fabrication shop, pre-wired and tested prior to shipping
  - 9) Electrically install all motors, control devices, and wire all motors and control devices to the E-House
  - 10) Network connections between HMI stations in main control room and PLC systems located in electrical room
  - 11) Supply the Backup Power Generator with Automatic Transfer Switch
  - 12) Install and wire the Backup Power Generator

- 13) Supply and install all necessary cable trays & junction boxes
- 14) Dryer Island lighting, power outlets, and welding outlets
- 15) Dryer Island emergency power stoppers supply/installation
- 16) Above ground lightning protection & grounding

Technical Specifications:

- Medium voltage switchgear (4160V) including feeders from main power distribution transformers
  - Eaton AMPGARD LBS Loadbreak Switch **or**
  - Eaton AMPGARD Main Breaker
- Low voltage power distribution center (480V) including feeders from main power distribution transformers
  - Eaton Pow-R Switchboard
- Low voltage MCC's including feeders from MCC to Motor c/w Ethernet/IP Interface
  - Allen-Bradley Centerline 2100
  - Motor starters (FVNR, FVR) c/w E300 Electronic Overload Relay
  - VFD – Rockwell – PF755 c/w line and load reactors
- MV VFDs will be standalone units, including feeders from MCC to Motor c/w Ethernet/IP Interface c/w Ethernet/IP Interface
  - Allen-Bradley PF6000
- UPS power supplies and associated transformers and panelboards
- Emergency power including generators, automatic transfer switches, associated distribution transformers and panelboards
- Panelboards and associated transformers for utilities
- Network Cabinets and Fiber Patch panels
- Low voltage Local Disconnect Switches for motors as indicated in motor list document
- 8 welding outlets
- PLC cabinets, local control panels, remote control panels as listed in panel list documents
- Power, control, data, and instrumentation tray cables, trays, wires and required miscellaneous hardware, as required for the completion of the entire installation of the drying island including electrical devices including sensors, instruments, actuators, solenoids, control and remote I/O panels, Ethernet.
- Supply and install all nameplates and/or safety signs (Arch Flash) as many as required by code regulations
- (power and data) all customer supplied PC's, monitors
- E-Stop stations and panels.
- Lighting Transformers and Panels
- Outdoor Lighting fixtures to provide process lighting for Dryer Island area.
- Outdoor Convenience Outlets (8) field mounted 120V convenience outlets.
- Heating and Ventilating Equipment for the electrical room / E-House
- One-(1) camera in the energy system for the purpose of viewing furnace fire
- Equipment bonding and connection to drying island loop



Prefabricated MCC Building shown next to Dryer Island

Buyer's Responsibility:

- 1) Temporary electrical power supply and field wiring for 480V welding machines and 110V electrical tools
- 2) Any Civil Works and underground works (underground conduits, underground lightning grid, and any other equipment underground)
- 3) Supply the Power Transformers and Power Disconnects for the E-House
- 4) Provide all weather and un-interrupted access to laydown areas for truck access, supplies, as well as storage of the same with suitable structure to support crane and forklift activity during inclement weather
- 5) Installation of any equipment not listed above
- 6) Primary Site Distribution
- 7) Main Power Distribution Transformers
- 8) Fire Alarm Systems
- 9) CCTV System
- 10) Power Factor Correction
- 11) Plant Lighting
- 12) Telephone system
- 13) Network cameras
- 14) Building fire alarm
- 15) Security gates
- 16) Main control room console

*Note: TSI and its sub-contractors are non-union; if unionized work is required then an adjustment to the price will be applied and paid by the Buyer.*

## TSI: General Terms and Conditions

The following items are part of TSI's proposal. In accepting TSI's proposal the Buyer also accepts these terms and conditions. Should the proposal be modified in any way to meet the Buyer's requirements these terms and conditions will still apply unless specifically modified and agreed to by TSI.

Please note the following items are specifically excluded from TSI's scope of supply unless otherwise clearly specified in the body of the proposal:

- 1) Building and floor slabs, building lights, electrical fittings, fire walls, wall and roof penetrations etc.
- 2) Site preparation, equipment foundations, anchor bolts, conduits, and all related civil work (including any civil calculations if required)
- 3) Plant air, water, gas, temporary gas lines, and power during installation and start-up.
- 4) Control room, including any desk, furniture or environmental equipment.
- 5) Any local use or permit taxes or fees; any state or provincial taxes; any other taxes.
- 6) Any items of machinery or system components which are not specified in the contract scope of supply. Integration of buyer supplied items is the responsibility of the buyer.

In addition to the above exclusions, the following items are conditions of this proposal:

- 7) Design details as specified in the proposal may vary from completed project to accommodate updates or improvements in machine operation or construction; in such cases overall operational specification will not be negatively altered.
- 8) TSI does not warrant interface data provided by the Buyer, the Buyer's engineers or by other suppliers to the Buyer.
- 9) The Buyer is responsible for the costs of any tests required by the regulatory bodies.
- 10) TSI is not responsible for the cost of any performance tests or the costs of any subsequent tests if adjustments or modifications made to the equipment as a result of prior test results, whether or not TSI equipment was at fault. Performance tests may be required to set-up/tune the system.
- 11) TSI provides a limited warranty against defects in workmanship and materials for twelve (12) months from date of first use, or within twenty-four months within first installation of that part. Any parts replaced by TSI due to warranty will have the warranty extended on the replaced parts by another twelve (12) months. The cost of parts and shipping to site will be paid by TSI. Fitting on site of the replacement parts will be at the Buyer's expense. Additional charges for expedited shipping, if requested, will be at the Buyer's expense. This warranty specifically excludes tooling, consumable supplies, and wear items. It also excludes damage due to improper installation, use, or upset conditions not directly attributable to TSI equipment. Changing the operating settings or modifying the equipment without written TSI approval will invalidate the warranty.
- 12) Failure of the Buyer to pay according to the terms of the contract will invalidate the above warranty.
- 13) Chargeable equipment deficiencies that arise during installation or warranty claims should be documented and forwarded to TSI prior to remedial action and TSI should be given reasonable opportunity to either approve the remedy or otherwise make good the deficiency; failure by the Buyer to adhere to above requirement may invalidate TSI responsibility towards chargeable equipment deficiency.
- 14) TSI reserves the right to photograph and video the installed and operating equipment for use in future TSI marketing and promotional efforts.
- 15) Any information provided by TSI in the course of a project, including machine designs, operating software, and other parameters, remains the property of TSI and may not be divulged to any third party not directly involved with the TSI portion of the project without the written consent of TSI. Failure to observe this condition may result in damage to TSI's immediate and future business interests for which recompense will be sought.
- 16) Where written authority is required from TSI that written authority must come from the President of TSI unless other representatives have been nominated by TSI as part of the project.
- 17) TSI is not responsible for consequential losses or damages incurred as a result of equipment failure or improper operation.
- 18) The conditions set forth in this document (TSI: General Terms and Conditions) take precedence over other parts of documentation submitted by TSI. If there is a conflict between the body of a proposal and this document, the terms as specified in this document will apply.

**ATTACHMENT 4**  
**Modeling Files**



## ALERTS IN EFFECT

DISMISS 

### PARK CLOSURES

#### Hurricane Ridge Road Status 1/7, 5:00pm

Hurricane Ridge Road will be closed Monday 1/8/24 through Thursday 1/11/24. The road is scheduled to reopen on Friday 1/12/24, weather and road conditions permitting.

[More \(https://www.nps.gov/olym/planyourvisit/hurricane-ridge-in-winter.htm\)](https://www.nps.gov/olym/planyourvisit/hurricane-ridge-in-winter.htm)

### DANGER

#### Multiple Closures Due to Severe Incoming Weather

For visitor safety, the park has closed all campgrounds due to winter storm impacts, and visitors are strongly cautioned to closely monitor changing weather conditions when visiting the park. Closed areas will reopen when it is safe to do so.

[More \(https://forecast.weather.gov/MapClick.php?lat=48.0999&lon=-123.4264\)](https://forecast.weather.gov/MapClick.php?lat=48.0999&lon=-123.4264)

+ [3 more non-emergency alert notifications... \(https://www.nps.gov/olym/planyourvisit/conditions.htm\)](https://www.nps.gov/olym/planyourvisit/conditions.htm)

Dismiss

[View all alerts \(https://www.nps.gov/olym/planyourvisit/conditions.htm\)](https://www.nps.gov/olym/planyourvisit/conditions.htm)

[NPS.gov \(https://www.nps.gov/\)](https://www.nps.gov/) / [Park Home \(https://www.nps.gov/olym/index.htm\)](https://www.nps.gov/olym/index.htm) / [Learn About the Park \(https://www.nps.gov/olym/learn/index.htm\)](https://www.nps.gov/olym/learn/index.htm)  
/ [Nature \(https://www.nps.gov/olym/learn/nature/index.htm\)](https://www.nps.gov/olym/learn/nature/index.htm) / [Environmental Factors](#)

## Environmental Factors

Environmental factors include everything that changes the local environment. This can include anything from natural forces like weather, [living park inhabitants \(https://www.nps.gov/olym/learn/nature/environmentalfactors.htm#CP\\_JUMP\\_285470\)](https://www.nps.gov/olym/learn/nature/environmentalfactors.htm#CP_JUMP_285470), or [human interactions \(https://www.nps.gov/olym/learn/nature/environmentalfactors.htm#CP\\_JUMP\\_285479\)](https://www.nps.gov/olym/learn/nature/environmentalfactors.htm#CP_JUMP_285479) like non-biodegradable litter. Any time you visit the park, you have an influence!

Every experience you have with nature is uniquely yours. Even if you have been to the park every year, you can see the changes because the environment around us is constantly changing such as weather, time of year, time of day, death and new life, and more. These environmental factors can even vary based on the influence of individual [ecosystems and natural features \(https://www.nps.gov/olym/learn/nature/naturalfeaturesandecosystems.htm\)](https://www.nps.gov/olym/learn/nature/naturalfeaturesandecosystems.htm) around them. Enjoy the moments as they are, for they will never be exactly the same way again!



Clouds hang in a river valley below the snow-capped Olympic Mountains  
NPS Photo

Some environmental changes are visible, such as a landslide caused by heavy rains. Other changes are not as easy to see. For example, some geologic change, like sediments becoming sedimentary rock, is too slow for the eye to see. Spending time in the park, one can find clues to the changes taking place right before us. While you may not be able to see a glacier move in real time, we witness the effects of these slow changes over time from climate change through studies and observation.

## Natural Factors:

The landscapes of the National Park are in a state of constant change. As water, earth, wind, and fire work independently and together to shape and shift, there are a multitude of forces at work changing Olympic. Every moment of every day, the scenic details are being altered in ways both big and small. These are just a few examples of the many natural forces that are always shaping the land and influence ecosystems:

### Water

One of the leading sources of change at Olympic National Park is water. Whether visitors are hiking to the river valleys and waterfalls or watching the waves along the coast, water is a driving force of nature throughout.

#### Erosion and Flooding

The many rivers are largely fed by annual snowmelt and rainfall, as well as the continual runoff from [glacial melt](https://www.nps.gov/olym/learn/nature/glaciers.htm) coming from the high mountain peaks. Water erodes away the landscape, changing it as the flow follows the path of least resistance. As the waters gradually carve the banks along them, a phenomenon called 'river braiding' occurs. Channels of intertwined streams cut back and forth, widening the river valleys as they snake through. During the rainy season, typically November through March, the rivers swell with rain, often reaching well beyond their banks. This flooding brings with it fallen trees that are swept downstream or out to sea. Roads can even be at risk of being swept away, such as the Elwha road, whose bridges have been swept out before.



Sol Duc River flooding, 2006  
NPS Photo

#### Tsunamis



While some changes occur over time, some can be much quicker. As you drive along the coast, you may see signs for a "Tsunami evacuation route" posted. Tsunamis are large, fast-moving waves. As the wave mass travels across the ocean, the wave and power behind it increases. Further out in the deep ocean, the waves can travel at 500 mph (800 kph). As it nears the shore, the wave condenses, slowing to 20-30 mph (30-50 kph), still faster than a human can run, but still containing the huge amount of power in what becomes a 10-100 ft (3-30 meter) tall wall of water as it hits land.

## Today and Tomorrow

Changes will always be occurring throughout Olympic's waterways, but what will it look like in the future? Snowmelt is declining as temperatures increase. Glaciers are melting quickly. Rivers that flow heavily today may decline, leaving people and animals to adjust to a drier peninsula. The park studies [water quality \(https://www.nps.gov/olym/learn/nature/waterquality.htm\)](https://www.nps.gov/olym/learn/nature/waterquality.htm) in order to ensure safety and understanding today and in the future.

Water is moving; changing. Rivers and glaciers carve out canyons and valleys. Ocean waves grind away cliff sides and create beaches of small rocks and shells. Water freezing in crevices splits cliffs into boulders and boulders into smaller rocks. Much of the natural beauty of the park is formed by water's nourishment. While parts of the peninsula lie in a rainshadow, the moss-laden rainforests found along the Hoh, Queets, and Quinault valleys accumulate an average of 138 inches of rainfall each year. Quenching the thirst of the forest allows for lush foliage to provide food and shelter for the wildlife of the park, as well as photo opportunities for visitors.



White Glacier receding, feeding the river valley below  
*NPS Photo*

## Earth

With mountain peaks, coastal spires, and literally everything in between, Olympic National Park is a geologic hub of yesterday, today, and tomorrow. The mountains are uplifting as the river valleys are being carved out. While much of geology moves too slowly to be witnessed in a single lifetime, some changes can occur in the blink of an eye. The changes can be drastic or minute, but every moment, this Earth and landscape are moving.

### Subduction

The Olympic Peninsula lies in the subduction zone between two tectonic plates, the North American Plate and the Juan de Fuca Plate, where they converge. As one folds under, it pushes the Olympic Mountains higher. This action can shake the earth, causing Earthquakes, particularly to the South and the West in

the Pacific Ocean. While earthquakes are rarely felt in the park, there is a faultline nearby, making them possible in the park and more common just a short distance away. Earthquakes shape and shift the earth on site. These are only one driving force of change! Some of these changes can cause residual damage as well.

## Rock Slides

Tremors underneath the ground, as well as continual erosion, can cause sections of mountains to let go. When this happens, rock and debris may be sent cascading downhill in the form of a rock slide. Trees and trails can be swept away in an instance

with nothing more than a bare scar left as a reminder of what once covered the hillside. When hiking along the hillsides of Olympic, remember to watch for loose ground and stay on trails to prevent erosion and stay safe.

## Glaciers

Glaciers in Olympic today are receding. As the force of these massive ice blocks moves over the land, it changes it. A glacier can grind the rock below its weight or leave behind debris from pebbles to erratics as large as a house. This constant glacial movement carves out valleys and rounds out saddles between peaks, leaving a noticeable mark on the land.

## Today and Tomorrow

As mountains continue to rise and glaciers continue to recede, the shapes and figures of the geologic giants change each year. Visitors come from all around to witness the geology of Olympic. Whether it is for the snow-capped mountain peaks and rock spires that stand out against their backgrounds of open sky and ocean, or for the lush forests, ever influenced by the valleys and rocky soil, visitors witness the magic of influence from geologic change throughout the entire park. As you continue the journey of learning about the earth, remember to leave no stone unturned!

## Wind

Can you picture the effects of wind? It may be a gentle breeze on your cheek, a gust that blows your hat off, or raging top-speed winds that can almost knock you to the ground. Wind can come in many forms, but will change the earth with every breath.

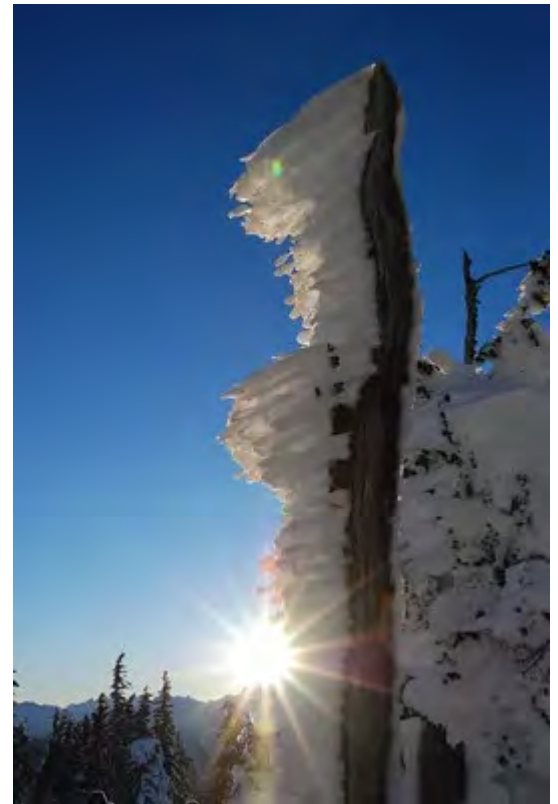
## Wind Storms

As the wind blows through the valleys, it can pick up strength. As more power is added, some gusts may become formidable forces that alter the land around them. Howling through the forests, the giant trees sway and bend with the winding wind. However, on occasion, these wind storms can be powerful enough to knock down lone trees or even entire swaths of forest, opening the dark floor to new beams of forgotten sunlight. Of course, no matter the devastating effects, the aftermath may allow for new growth to foster in an area once reigned by the giants of the forest.

## Spreading Seeds and Other Things

Wind does not just destroy, but can help to spread life. Many plants rely on gusts to push their young seeds to new, fertile soil. This may even land atop a freshly fallen tree from a wind storm that can then become a nursery log as it nurtures the seeds from its nutrients. Wind is not only localized, but can carry with it stories in many forms. As fires rage even in other states, wind can carry the smoke across the region, clouding the skies and reducing air quality for miles.

## Adapting to Wind



Rime ice on Hurricane Ridge on a sunny winter day  
*NPS Photo*

While wind can alter by destroying or creating, it can also alter by encouraging resistance through adaptations. One of the best examples is seen in the trees that can adapt to such a windy way of life. Some trees endure by bending to the wind's will and allowing their needles and branches to grow where the wind pushes them. Trees that are hundreds of years old may trick the eye as they stay low to the ground, their growth stunted, but their ability to keep from crashing down ever increased. These adaptations can be seen atop Hurricane Ridge, as the gnarled trunks of the evergreens have been twisted by the wind's might. There have been historic records of wind speeds reaching up to 80 mph (129 km/h), giving the ridge its name. With almost constant winds coming in from the ocean, coastal trees may adapt in a similar manner, becoming gnarled and twisted as they sway to the salty sea breeze.

## Erosion

Wind may carry more than dust as it chips away and brings change to massive rocks that become smaller over time. This can be especially noticeable on the coastal shores as windswept sands blow past. When wind is contained or consistent, major erosion can be seen. From stripped rock faces to a gaping hole beneath a tree on the coast line, wind, often combined with other elements, can leave many a mark before blowing on by.

## Today and Tomorrow

Wind presence and speed may vary by day, but its presence overall is a constant factor of change. As you return to the park or see photos over time, look for the changes that may be caused by the most fervent blows or the quietest whisper of the winds.



Mosses and lichen burning on a Red Alder  
*NPS Photo*

## Fire

Fire is a natural part of succession through ecosystems. Even in a rainforest, there is a dry season through the summer months where the land can become parched. Fire appears to scar the land, but, like all natural elements, it plays more than one role throughout the park.

### A Forest Ablaze

After a fire ignites, it can smolder or spread with intensity. Many fires are started from lightning strikes. These are a natural occurrence that changes the land. Some vegetation may get singed, while other plants may die from the heat and flames. Some plants have adaptations for fire resistance such as the Douglas Fir, whose extremely thick outer layer of bark can deter the flames from catching on its wood. While fire spreads, the smoke can be seen from miles away, allowing for onlookers to understand the current activity.

### What Comes Next

Fire can cleanse an ecosystem, allowing for regeneration and regrowth on a now-blank canvas. Sun-loving trees will flourish in an open field and

some flowers particularly love recently heated ground. What may have been old-growth stands can give way for a new generation of giants to begin their story and build a new forest home as they take visitors along with them.

## Today and Tomorrow

Humans will always play a role. While many camping areas allow fires, not all do so be sure to plan ahead. Human-started fires have happened in the park, leaving unnatural scars in their wake. As these can spread rapidly, visitors are asked to fully extinguish any flame or ember before continuing to explore the ever-changing Olympics.

## The Elements Together

Of course none of these natural factors are influencing the landscape alone. Erosion and deposition can come in many forms. Changes to the forest can come from fire, wind, or water changing course. No matter where you go in Olympic National Park or the world, the environment and its factors are interwoven, creating a tapestry that tells a story of the past, present, and, if you observe carefully, the future.

## Plants and Animals

Plants and animals are abundant throughout Olympic National Park, breathing color and life into every habitat. As they grow, they change their ecosystem along with themselves. Plants and animals will influence and can be influenced by each other, the geology and elements, and the people that visit.

### Plants

Plants can change the park as they grow, and as they die. They provide shelter and food to animals, space for other plants like ferns and mosses, and nutrients even after death as nursery logs. Drift logs are washed in and out by the sea, changing the look and habitat of the coastline. The Olympic

Peninsula is naturally a fertile landscape, however, not all species were originally here. [Nonnative plants](https://www.nps.gov/olym/learn/nature/nonnativespecies.htm)

[have been brought in, both intentionally and by mistake. Some of these nonnatives can be](https://www.nps.gov/olym/learn/nature/nonnativespecies.htm) [invasive](https://www.nps.gov/olym/learn/nature/invasiveplants.htm) [\), as well, taking over the land that was once only home to the native foliage and blocking other species from thriving. Fungi, bacteria, and insects eat through dead plants, decomposing them and breaking down the nutrients. Elements can change plants from fire to windstorms. Plants can change the way these elements interact as well, from resisting the hot flames to blocking wind in dense forests. Plants like the old growth giants of the forest draw people to the park. Dense underbrush may naturally direct the designated trails that people are asked to stay on. The vibrant plants link the story of change through the Olympics with every twig and root.](https://www.nps.gov/olym/learn/nature/invasiveplants.htm)

### Animals

Animals control and increase plant numbers and variety. Grazing deer and elk eat shrubbery, and their appetites greatly affect plant growth. If the number of large herbivores is too many, overgrazing may occur. Animals are also some of nature's most useful seed dispersers and pollinators. Not only do insects like bees actively transfer pollen from one flower to the next, but birds and mammals will carry seeds unknowingly for miles, dispersing the undigestible ones in their droppings, which in turn provides ample fertilizer. Aside from the living foliage, animals change the habitat structure. As beavers construct their dams, the flow of rivers and streams are changed, often causing ponds and wetlands to develop, altering the aquatic landscape and allowing for different plants to move in. As animals roam, they make their mark on the land. Some animals dig dens, mark trees, roll in wallows on hillsides, make trails as they



Roosevelt elk help some plants get sunlight by keeping others from growing too high or dense.

*NPS Photo*



traverse, or build nests. Animals have been introduced and extirpated throughout Olympic's history, but they have always played a role in the changes of plants, geology, humans and other animals alike.



NPS staff and volunteers with coastal trash  
NPS Photo

## Human Effects:

The national parks are set aside for the benefit and enjoyment of the people as well as to preserve and protect the natural world. Within that balance, people play an important role. Humans influence their environment by simply being there. Any given moment in nature, a person may have a positive or negative affect on their surroundings. Throughout Olympic National Park, visitors can show their positive natural influence in many ways!

### Utilizing Park Infrastructure

Park management is seen across the front country of Olympic. Roads, trails, and buildings that people use and enjoy each day have an overall impact. Not only do they define where plants and animals can and cannot live, they direct visitors to specific parts of the landscape. Over 95% of Olympic National Park is designated **wilderness**

(<https://www.nps.gov/olym/planyourvisit/wilderness.htm>). As defined by the **1964 Wilderness Act** (<http://wilderness.org/article/wilderness-act>), a wilderness is "...an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain." While visitors may not create the roads or buildings, people often have a say on proposed changes to the parks.

### What can you do to help?

Throughout the park, there are many designated parking spaces. Plan ahead to see where RVs and trailers may be restricted. Park in designated areas rather than on plants or blocking roadways. Utilize established roads for access. Camp in designated areas only. Enjoy the many visitor centers, facilities, and exhibits throughout the park! As it can be a very busy park, remember to pack your patience.

## Traversing on Trails

Olympic National Park sees over 3 million visitors on average. With over 600 miles of trails designed to explore and view fantastic sights, there are numerous opportunities to explore areas close to the roads or far in the backcountry. Visitors love to see all there is to see in Olympic. Please remember to leave as little impact when exploring these natural spaces to protect the landscape and prevent social trails.

What is a social trail? A trail that is not designated or controlled, but has become distinct due to continual use.

Why are they disliked? Social trails destroy important vegetation and habitat. They can also lead other hikers astray from the main trail. As social trails are not maintained, they may pose dangers like rough terrain, fallen trees, and erosion.

### What can you do to help?

Stay on trails. If you explore in an area without trails, such as the backcountry or tidepools, be sure to follow **Leave-No-Trace** (<https://www.nps.gov/olym/planyourvisit/wilderness-leave-no-trace.htm>) principles by not creating or following a distinct trail that may destroy the vegetation. Plan ahead and look online or ask a ranger for trail suggestions.

## Safe Wildlife Interactions

Wildlife watching is just one of the many ways to enjoy the park. Olympic has a variety of wildlife from the forest to the ocean that can be seen throughout the year. Stay safe and informed by learning more about [wildlife spotting tips and tricks](https://www.nps.gov/olym/planyourvisit/wildlife-viewing.htm) (<https://www.nps.gov/olym/planyourvisit/wildlife-viewing.htm>). Some are elusive, and others quite common, but National Park wildlife is meant to be *wild*. Feeding human food to animals can make them dependent and less able to forage on their own. Once accustomed to humans, larger animals like deer or bears can become dangerous in their [search for food](https://www.nps.gov/olym/planyourvisit/wilderness-food-storage.htm) (<https://www.nps.gov/olym/planyourvisit/wilderness-food-storage.htm>). While visitors don't want to get too close, be sure to respect the homes of the animals. Making noise is a great way to be safe, but scaring wildlife with loud noises or altering their habitat can affect where and how they live.

### What can you do to help?

Very few issues between people and animals occur in Olympic thanks to visitors following a few simple rules. Be sure to use designated bear wires and bear-proof canisters when backcountry camping. Pack out what you pack in. Never leave food unattended, and leave all scented items in the car overnight. Know which parts of the park are [pet-friendly](https://www.nps.gov/olym/planyourvisit/pets.htm) (<https://www.nps.gov/olym/planyourvisit/pets.htm>).

## Not Littering

When people come to the park, they may hope to see mountains, rivers, glaciers, forests and oceans. These natural views can be impeded by trash or remains of those that came before. Leaving evidence of your time in nature can impede people, animals, and vegetation alike for years. Non-natural items that get into the ocean may be out of reach from helping hands, creating a greater danger for sealife to swallow or get caught in. One of Olympic's best community efforts revolves around [coastal cleanups](https://www.nps.gov/olym/getinvolved/supportyourpark/coastal-cleanups.htm) (<https://www.nps.gov/olym/getinvolved/supportyourpark/coastal-cleanups.htm>)! With over 3 million visitors per year on average, Olympic and its visitors work hard to maintain a natural ecosystem.

### What can you do to help?

After exploring the park, take any trash you have with you or deposit it in a bear-proof trash can. If you see trash, please help the park by picking it up or letting a ranger know. Generations of visitors will thank today's stewards that keep this park pristine.

## Not Taking or Leaving

Litter can be anything not naturally occurring in the ecosystem. From trash, to invasive seeds, to painted rocks, to fires left smoldering, people can prevent many issues that can occur. Taking plants, animals, and even rocks or twigs from the park ecosystems can kill them, leave a lack of food or shelter for animals, and lessen the beauty of the diverse ecosystems for other visitors. Remember that with millions of visitors each year, Olympic is for all to enjoy and may not last should every person leave with a piece of it.

### What can you do to help?

Know before you go: Check your shoes for [Nonnative Species](https://www.nps.gov/olym/learn/nature/nonnativespecies.htm) (<https://www.nps.gov/olym/learn/nature/nonnativespecies.htm>) and [Invasive Plants](https://www.nps.gov/olym/learn/nature/invasiveplants.htm) (<https://www.nps.gov/olym/learn/nature/invasiveplants.htm>) that can be carried in from other locations. Remember your camera! Taking photos is a fantastic way to remember your experience in the park and inspire others from your experiences.

After exploring the park, take any trash you have with you or deposit it in a bear-proof trash can. If you see trash, please help the park by picking it up or letting a ranger know.

## Helping Here and at Home

Some larger impacts can be made over time. Aside from litter or damage one may see, other impacts can sometimes go unnoticed. Whether in the park or at home, people may use lights, make noise, and use tools. Light pollution is minimized in many areas with downward facing lighting fixtures and automated lights. Olympic has a large part of its landscape that is far from roads and other infrastructure where people and cars create sound, and the density of the park's lush forests dampens natural noises as well. Sounds can change visitor and animal behaviours alike. Helping to keep the wilderness wild comes in a variety of ways, including maintaining natural nightskies and soundscapes.

### What can you do to help?

If you stop on a trail, a fun exercise is to close your eyes and listen, counting the number of individual sounds you can hear. How many are natural? How many are caused by people? Imagine being an animal hunting or hiding in the forest, needing your keen sense of hearing at all times. If you visit a national park, look up at the night sky. Does it look different from the skies in a city near your home? Now imagine being a bird or bug that travels using the stars. Where would it be more difficult? By reducing light emissions and turning off lights and electronics when not in use, people can collectively reduce the amount of light that clouds the night skies.

## Reducing Carbon Footprints

People all have a carbon footprint left behind based on the amount they use and produce. Automobiles and industry put tons of carbon dioxide into the atmosphere that can eventually cause worldwide temperatures to rise and [glaciers to melt](https://www.nps.gov/olym/learn/nature/glaciers.htm) (<https://www.nps.gov/olym/learn/nature/glaciers.htm>).

### What can you do to help?

Thinking ahead can help to reduce your carbon footprint. While there are many ways to reduce a footprint, in the park, one simple way is to not idle your car for long periods of time.

## Having Positive Impacts to Water Quality

Chemical runoff, sedimentation, and accumulation of nitrogen in mountain lakes influence water quality in Olympic National Park. Olympic is known for its blue rivers and lakes, deep salty coastline, and clear natural springs.

### What can you do to help?

People consist of up to 60% water. Water is crucial to all living things. Visitors can help to protect water sources by camping at least 200 feet from water sources and avoiding washing dishes in waterways.

Thank you for leaving a positive impact!  
What can you do to continue to help?

No matter where you are, you can have a positive impact. Check out more ideas to get involved and help Olympic and other natural spaces:



- [Park Clean-Ups \(https://www.nps.gov/olym/getinvolved/supportyourpark/coastal-cleanups.htm\)](https://www.nps.gov/olym/getinvolved/supportyourpark/coastal-cleanups.htm)
- [Volunteer \(https://www.nps.gov/olym/getinvolved/volunteer.htm\)](https://www.nps.gov/olym/getinvolved/volunteer.htm)
- [Get Involved \(https://www.nps.gov/olym/getinvolved/index.htm\)](https://www.nps.gov/olym/getinvolved/index.htm)
- [Plan Ahead \(https://www.nps.gov/olym/planyourvisit/index.htm\)](https://www.nps.gov/olym/planyourvisit/index.htm)
- [Become a Jr. Ranger \(https://www.nps.gov/olym/learn/kidsyouth/beajuniorranger.htm\)](https://www.nps.gov/olym/learn/kidsyouth/beajuniorranger.htm)
- Learn more:
  - [Leave-No-Trace \(https://www.nps.gov/olym/planyourvisit/wilderness-leave-no-trace.htm\)](https://www.nps.gov/olym/planyourvisit/wilderness-leave-no-trace.htm)
  - [Help Stop the Spread of Invasive Species \(https://www.nps.gov/olym/planyourvisit/stopinvasives.htm\)](https://www.nps.gov/olym/planyourvisit/stopinvasives.htm)



Windfalls from 2007 windstorm, Quinault  
*NPS Photo*

Last updated: September 27, 2020

**Was this page helpful?**

☐ Yes

☐ No



An official form of the United States government. Provided by [Touchpoints](https://touchpoints.app.cloud.gov/)  
(<https://touchpoints.app.cloud.gov/>)

CONTACT INFO

**Mailing Address:**

600 E. Park Avenue  
Port Angeles, WA 98362

**Phone:**

360 565-3130

## Attachment BB

**AIR EMISSION TEST REPORT  
ENVIVA PELLETS GREENWOOD, LLC  
Greenwood, South Carolina**

Prepared by

John Richards, Ph.D., P.E., David Goshaw, P.E., QSTI, and Jonas Gilbert, P.E., QSTI  
Air Control Techniques, P.C.  
301 East Durham Road  
Cary, NC 27513  
(919) 460-7811

Emission Test Dates: December 4-5, 2018, January 16, 2019, and March 7, 2019  
Report Date, April 4, 2019



## TABLE OF CONTENTS

|                                                                                                                                 |     |
|---------------------------------------------------------------------------------------------------------------------------------|-----|
| 1. SUMMARY                                                                                                                      | 1   |
| 1.1 Purpose and Scope                                                                                                           | 1   |
| 1.2 Test Results Summary                                                                                                        | 1   |
| 1.3 On-Site Test Program Personnel                                                                                              | 4   |
| 2. TEST METHODS                                                                                                                 | 6   |
| 2.1 Test Locations                                                                                                              | 6   |
| 2.2 Sampling Point Determination—EPA Method 1                                                                                   | 9   |
| 2.3 Flue Gas Velocity and Volumetric Flow Rate—EPA Method 2                                                                     | 9   |
| 2.4 Flue Gas Moisture Content—EPA Method 4                                                                                      | 9   |
| 2.5 Filterable and Condensable Particulate Matter—EPA Method 5 and Method 202                                                   | 10  |
| 2.6 Oxygen/Carbon Dioxide, Nitrogen Oxides, Carbon Monoxide, and Volatile Organic Compounds—EPA Methods 3A, 7E, 10, 18, and 25A | 12  |
| 2.7 FTIR Sampling System                                                                                                        | 15  |
| 3. SUMMARY AND DISCUSSIONS OF RESULTS                                                                                           | 19  |
| 3.1 Dryer/RTO Test Results                                                                                                      | 19  |
| 3.2 Dry Hammermill Test Results                                                                                                 | 22  |
| 3.3 RCO 1 and RCO 2 Test Results                                                                                                | 25  |
| 4.0 QUALITY ASSURANCE AND QUALITY CONTROL                                                                                       | 30  |
| 4.1 Particulate Matter Tests, Methods 5 and 202                                                                                 | 30  |
| 4.2 Oxygen, Carbon Dioxide, Nitrogen Oxides, Volatile Organic Compound and Carbon Monoxide Tests, Methods 3A, 7E, 10, and 25A   | 33  |
| 4.3 HAPs Tests, Method 320 and Method 321                                                                                       | 42  |
| APPENDIX IA. Method 5/Method 202 Field Data Sheets                                                                              | 44  |
| APPENDIX IB. Method 5/Method 202 Laboratory Report AND Chain-of-Custody                                                         | 59  |
| APPENDIX IC. Method 3A, 7E, 10, 25A, AND Method 320 Data Sheets                                                                 | 76  |
| APPENDIX ID. Method 18 Laboratory Report                                                                                        | 109 |
| APPENDIX IE. Calibration Gas Certification Sheets                                                                               | 192 |
| APPENDIX IF. Sampling Equipment Calibration Data Sheets                                                                         | 201 |
| APPENDIX IG. Process Data                                                                                                       | 209 |

|                                                                                 |         |
|---------------------------------------------------------------------------------|---------|
| APPENDIX IIA. Method 5/Method 202 Field Data Sheets .....                       | 215     |
| APPENDIX IIB. Method 5/Method 202 Laboratory Report AND Chain-of-Custody .....  | 226     |
| APPENDIX IIC. Method 3A, 7E, 10, 25A, AND Method 320 Data Sheets.....           | 243     |
| APPENDIX IID. Method 18 Laboratory Report.....                                  | 279     |
| APPENDIX IIE. Calibration Gas Certification Sheets.....                         | 358     |
| APPENDIX IIF. Sampling Equipment Calibration Data Sheets.....                   | 367     |
| APPENDIX IIG. Process Data.....                                                 | 371     |
| <br>APPENDIX IIIA. Method 5/Method 202 Field Data Sheets .....                  | <br>379 |
| APPENDIX IIIB. Method 5/Method 202 Laboratory Report AND Chain-of-Custody ..... | 387     |
| APPENDIX IIIC. Method 3A, 7E, 10, 25A, AND Method 320 Data Sheets.....          | 402     |
| APPENDIX IIID. Method 18 Laboratory Report.....                                 | 420     |
| APPENDIX IIIE. Calibration Gas Certification Sheets.....                        | 517     |
| APPENDIX IIIF. Sampling Equipment Calibration Data Sheets.....                  | 527     |
| APPENDIX IIIG. Process Data.....                                                | 532     |

## DEFINITIONS

Volatile Organic Compounds (VOC)—As used in this test report, volatile organic compounds mean total hydrocarbons measured in accordance with U.S. EPA Method 25A measured on a propane basis minus methane.

Organic Hazardous Air Pollutants—As used in this test report, organic hazardous air pollutants include only (1) methanol, (2) formaldehyde, and (3) acetaldehyde.

## ACRONYMS

|       |                                                                    |
|-------|--------------------------------------------------------------------|
| CEM   | Continuous Emission Monitor                                        |
| CPM   | Condensable Particulate Matter                                     |
| DHEC  | South Carolina Department of Health and Environmental Conservation |
| DHM   | Dry Hammermill                                                     |
| EPA   | U.S. Environmental Protection Agency                               |
| FID   | Flame Ionization Detector                                          |
| FTIR  | Fourier Transform Infrared Spectroscopy                            |
| HAPS  | Hazardous Air Pollutants                                           |
| ODT   | Oven Dried Tons                                                    |
| OHAPS | Organic Hazardous Air Pollutants                                   |
| RCO   | Recuperative Catalytic Oxidizer                                    |
| RTO   | Regenerative Thermal Oxidizer                                      |
| VOC   | Volatile Organic Compounds as defined by DHEC                      |

## UNITS OF MEASURE

|           |                                     |
|-----------|-------------------------------------|
| ACFM      | Actual cubic feet per minute        |
| DSCFM     | Dry standard cubic feet per minute  |
| gr./DSCF  | Grains per dry standard cubic foot  |
| in.       | Inches                              |
| in. w.c.  | Inches of water column              |
| ppm       | Parts per million                   |
| ppmvd     | Parts per million volume, dry basis |
| ppmvw     | Parts per million volume, wet basis |
| Lbs./hour | Pounds per hour                     |

## STANDARD CONDITIONS

|             |                         |
|-------------|-------------------------|
| Pressure    | 29.92 inches of mercury |
| Temperature | 68 degrees Fahrenheit   |

## SIGNIFICANT DIGITS AND DATA ROUNDING

All emissions data are expressed in a maximum of three digits and usually in two digits. All subordinate calculations used in calculating emissions are conducted carrying a minimum of five digits and usually nine digits. Significant digit and data rounding procedures are consistent with EPA policy.



# AIR EMISSION TEST REPORT

## ENVIVA PELLETS GREENWOOD, LLC

### 1. SUMMARY

#### 1.1 Purpose and Scope

This air emission test report summarizes the procedures and results compiled at the Enviva Pellets Greenwood, LLC (Enviva) dry hammermill (DHM) and dryer regenerative thermal oxidizer (RTO) on December 4-5, 2018, on the pellet cooler RCO 2 stack on January 16, 2019, and on the pellet cooler RCO 1 stack on March 7, 2019. The stack and control device numbering used in this test plan are consistent with South Carolina DHEC permit 1240-0133-CBr1 and R2 and the Test Protocol approved by South Carolina DHEC on November 27, 2018.

Section 1.2 of this report provides a summary of the test results and the process operating conditions during the tests. Section 1.3 includes a list of the Enviva personnel, the DHEC test observers, and the Air Control Techniques, P.C. personnel on-site. Section 2 provides a summary of the emission test methods and the four sampling locations—Stacks S1, S3, S5, and S6. Section 3 includes the complete test results. Quality assurance data compiled during the test program are provided in Section 4 and the appendices. The supporting data and quality assurance information for the three test programs are provided in Appendix I for the December 2018 tests, Appendix II for the January 2019 tests, and Appendix III for the March 2019 tests.

Prior to the start of this emission test program, Air Control Techniques, P.C. conducted Method 320-based validation tests. The results of these tests confirmed the accuracy of Methods 320 and 321 for the measurement of methanol, formaldehyde, acetaldehyde, and hydrogen chloride in both combustion gas streams and systems handling ambient air. The results of these tests are summarized in a separate test report submitted to the South Carolina DHEC.

#### 1.2 Test Results Summary

**Dryer RTO System**—The dryer RTO system includes a rotary dryer, a large diameter cyclone, a wet electrostatic precipitator (WESP), and a RTO. This system includes a 100-inch diameter 75-foot high stack. This stack was tested using U.S. EPA Reference Methods 2, 3A, 4, 5, 7E, 10, 25A, 202, 320, and 321. The Method 5 and 202 sampling trains were combined into a single unit. Table 1-1 provides a summary of the three test runs.

| Table 1-1. Stack S1, Dryer/RTO Air Emissions |        |             |            |
|----------------------------------------------|--------|-------------|------------|
| Pollutant                                    | Method | Pounds/Hour | Pounds/ODT |
| Filterable Particulate                       | 5      | 0.35        | 0.0053     |
| Condensable Particulate                      | 202    | 1.5         | 0.023      |
| Nitrogen Oxides as NO <sub>2</sub>           | 7E     | 18.5        | 0.28       |
| Carbon Monoxide                              | 10     | 9.9         | 0.15       |
| Volatile Organic Compounds as Propane        | 25A    | 5.2         | 0.079      |
| Methanol                                     | 320    | 0.0         | 0.0        |
| Acetaldehyde                                 | 320    | 0.0         | 0.0        |
| Formaldehyde                                 | 320    | 0.33        | 0.0050     |
| Hydrogen Chloride                            | 321    | 0.0         | 0.0        |

There were no quality assurance issues in these dryer stack tests. Prior to this test program, Air Control Techniques, P.C. conducted a set of validation tests that demonstrated the accuracy of Method 320 for the three organic hazardous air pollutants (HAPs) and Method 321 for hydrogen chloride in the RTO stack.

The production rates in the dryer system during the three test runs ranged from 64.1 to 67.0 ODT/hour. The wood being processed was 75% softwood, and the remainder hardwood. Supporting data can be found in Appendix IG.

**Dry Hammermill System**—The Dry Hammermill (DHM) system includes a set of five cyclo-filters equipped with PTFE membrane filter bags. This system includes a 62.5-inch diameter 60-foot high stack (S3). This stack was tested using U.S. EPA Reference Methods 2, 3A, 4, 5, 25A, 202, 320, and 321. The Method 5 and 202 sampling trains were combined into a single unit. There were three one-hour test runs using this set of EPA test methods. Table 1-2 provides a summary of the three test runs.

| Table 1-2. Stack S3, DHM Air Emissions |        |             |            |
|----------------------------------------|--------|-------------|------------|
| Pollutant                              | Method | Pounds/Hour | Pounds/ODT |
| Filterable Particulate                 | 5      | 8.7         | 0.13       |
| Condensable Particulate                | 202    | 0.20        | 0.0031     |
| Volatile Organic Compounds as Propane  | 25A    | 35.4        | 0.55       |
| Methanol                               | 320    | 0.32        | 0.0049     |
| Acetaldehyde                           | 320    | 0.0         | 0.0        |
| Formaldehyde                           | 320    | 0.015       | 0.00023    |
| Hydrogen Chloride                      | 321    | 0.015       | 0.00023    |

There were no quality assurance issues in these tests. However, testing personnel noted that some large clumps of particulate matter were occasionally passing upward through the stack. These large clumps of material appeared to be solids that had accumulated on an inner surface of the cyclo-filter outlet ducts and/or on the lower portions of the stack during previous system maintenance periods. This condition biased the filterable particulate matter emissions to higher-than-normal levels. Post-test evaluation of the dry hammermill operating data indicated that they were not operating normally, which contributed to the higher than normal particulate matter test results.

Prior to this test program, Air Control Techniques, P.C. conducted a set of 320 validation tests to demonstrate the accuracy of Method 320 for the three organic hazardous air pollutants (HAPs) and Method 321 for hydrogen chloride for a DHM source that inherently has high oxygen concentrations, low moisture levels, and modest VOC levels. The production rates in the dry hammermill system during the three test runs ranged from 64.7 to 65.5 ODT/hour. The wood being processed was 75% softwood, and the remainder was hardwood.

**Pellet Cooler Systems**—Enviva has 5 pellet coolers. Two of the pellet coolers systems exhaust to RCO 2 serving Stack S6 on the north side of the Pellet Cooler Building. Three of the pellet cooler systems exhaust to RCO 1 serving Stack S5.

RCO 2 was tested on January 16, 2019 after the bypass damper was fixed. RCO 2 and the pellet cooler systems operated normally during these tests with the exception of four short-duration process interruptions during Run 5. The first two runs were voided due to sampling train leaks caused by the difficulty of moving the large Method 5/Method 202 sampling train in a space-constrained and awkwardly placed sampling port. The lift was repositioned after the second run allowing the operator better access for handling the Method 5/202 sampling train. The samples from all five runs were analyzed, and the results for Runs 3 through 5 are reported in Table 1-3. Only Runs 3, 4 and 5, which had successful post-test leak checks are being reported to demonstrate compliance. The data from Runs 1 and 2 are included in Appendix IIA and are provided only for informational purposes.

| Table 1-3. Stack S6, Pellet Cooler RCO 2 Air Emissions |        |             |            |
|--------------------------------------------------------|--------|-------------|------------|
| Pollutant                                              | Method | Pounds/Hour | Pounds/ODT |
| Filterable Particulate                                 | 5      | 0.22        | 0.0086     |
| Condensable Particulate                                | 202    | 0.10        | 0.0041     |
| Nitrogen Oxides                                        | 7E     | 0.15        | 0.0063     |
| Carbon Monoxide                                        | 10     | 0.10        | 0.042      |
| Volatile Organic Compounds as Propane                  | 25A    | 1.2         | 0.047      |
| Methanol                                               | 320    | 0           | 0          |
| Acetaldehyde                                           | 320    | 0           | 0          |
| Formaldehyde                                           | 320    | 0.059       | 0.0025     |
| Hydrogen Chloride                                      | 321    | 0           | 0          |

RCO 1 serving Pellet Coolers 1 through 9 on the south side of the Pellet Cooler Building was tested on March 7, 2019. This test followed modifications to an induced draft fan and damper to eliminate small bypass emissions. The results of the tests on Stack S5 on RCO 1 are summarized in Table 1-4.

| Table 1-4. Stack S5, Pellet Cooler RCO 1 Air Emissions |        |             |            |
|--------------------------------------------------------|--------|-------------|------------|
| Pollutant                                              | Method | Pounds/Hour | Pounds/ODT |
| Filterable Particulate                                 | 5      | 0.14        | 0.0036     |
| Condensable Particulate                                | 202    | 0.18        | 0.0046     |
| Nitrogen Oxides                                        | 7E     | 0.26        | 0.0064     |
| Carbon Monoxide                                        | 10     | 2.4         | 0.059      |
| Volatile Organic Compounds as Propane                  | 25A    | 1.4         | 0.035      |
| Methanol                                               | 320    | 0.01        | 0.00026    |
| Acetaldehyde                                           | 320    | 0.0         | 0.0        |
| Formaldehyde                                           | 320    | 0.0         | 0.0        |
| Hydrogen Chloride                                      | 321    | 0.0         | 0.0        |

### 1.3 On-Site Test Program Personnel

The Enviva Pellets Greenwood, LLC (Greenwood) Project Managers for this testing project were Bruce Peterson, Joe Harrell, and Wayne Franklin. They supervised collection of all process data.

The Air Control Techniques, P.C. project manager for the dryer and dry hammermill tests was John Richards. The Air Control Techniques, P.C. project manager for the pellet cooler RCO 1 and RCO 2 test programs was David Goshaw. Addresses and phone numbers of these individuals are provided below.

Bruce Peterson  
Enviva Pellets Greenwood, LLC.  
Enviva Way  
Greenwood, South Carolina  
Telephone: 864-992-9469

Joe Harrell  
Enviva Biomass, LLC  
Ahoskie, NC  
(252)-370-3181

Wayne Franklin  
Enviva Biomass, LLC  
4242 Six Forks Road, Suite 1050  
Raleigh, NC  
Telephone: 948-789-3655

John Richards, Ph.D., P.E., President  
Air Control Techniques, P.C.  
301 E. Durham Road  
Cary, North Carolina, 27513  
Telephone: (919) 460-7811 office  
Telephone (919) 624-3071 cell

David Goshaw, P.E., QSTI, Project Manager  
Air Control Techniques, P.C.  
301 E. Durham Road  
Cary, North Carolina, 27513  
Telephone: (919) 460-7811 office  
Telephone (919) 624-3074 cell

Todd Brozell, P.E., QSTI, Jonas Gilbert, P.E., QSTI, Elias Gilbert, Tom Holder, QSTI, and Wallace Smith assisted John Richards and David Goshaw in one or more of the test programs.

Resolution Analytics, Inc. performed the analyses of all Method 5 and 202 samples. The project manager at this laboratory is Bruce Nemet.

Bruce Nemet  
Resolution Analytics, Inc.  
208 Technology Park Lane  
Fuquay Varina, North Carolina 27526  
Telephone: (919) 346-5740

Mike Verzwuyvelt was the South Carolina Department of Health and Environment on-site test observer. His contact information is listed below.

Michael Verzwuyvelt  
Environmental Manager  
Source Evaluation Section  
S.C. Dept. of Health & Environmental Control  
Telephone: (803) 898-1789 office

## 2. TEST METHODS

### 2.1 Test Locations

**Dryer/RTO Stack (S1)**—The Dryer/RTO stack is shown in Figure 2-1. There are four ports spaced 90 degrees apart. Each of the ports is six inches diameter.

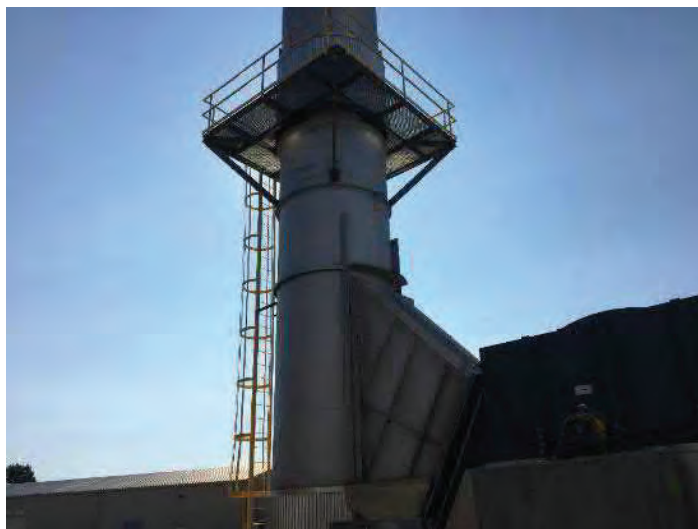


Figure 2-1. Dryer stack S1

Air Control Techniques, P.C. performed a stratification test at the Dryer Stack. The test results determined that the gas stream was unstratified. Accordingly, the CEM probe was mounted at a point that matched the approximate mean concentration.

The gas flow rate was measured in accordance with Method 2. Twenty-four traverse points were used—six sampling points on each of four traverses. The gas moisture content was measured using Method 4. A Method 3A analyzer was used to measure the oxygen and carbon dioxide concentration.

Prior to the compliance test runs, the cyclonic flow angles were checked. The average cyclonic angle was 0.8 degrees—well below the maximum allowed angle of 20 degrees. The S1 sampling port locations satisfied EPA Method 1 criteria.

**DHM Stack (S3)**—There are five fabric filters serving the five hammermills. The effluent gas streams from the five fabric filters combine into a single manifold leading to a single stack, S3, shown in Figure 2-2.



Figure 2-2. Hammermill building and stack

Stack S3 is 62.5 inches in diameter. There are four ports spaced 90 degrees apart. Each of the ports is five inches in diameter. The stack discharge point is 1.09 stack diameters upstream of the sampling ports, and the closest downstream disturbance is 4.8 stack diameters. Twenty-four sampling points (6 each on four traverses) were used for the Method 5/202 particulate matter tests. Twenty-four sampling points was also used for the Method 2 gas velocity traverses.

The CEM probe was mounted in the approximate center of the stack. A Method 3A analyzer was used to measure the oxygen concentration for all emission measurements.

**RCO Stacks**—The vertical sections of the exit ducts for the north side and south side RCOs provided the best sampling locations. Two ports were installed 90-degrees apart at the locations shown in Figures 2-3 through 2-5. With these two ports, it was possible to fully traverse the RCO exit ducts.





North Side RCO exit  
duct sampling  
location, Two 4-inch  
ports 90-degrees  
apart

Figure 2-3. Vertical RCO 2 exit duct on the north side of the Pellet Cooler Building



South Side RCO exit  
duct sampling  
location, Two 4-inch  
ports 90 degrees apart

Figure 2-4. Vertical RCO 1 exit duct on the south side of the Pellet Cooler Building

The test crews at each of these two locations are shielded and sufficiently far from deflagration panels on the side walls of the fabric filters.

Due to the flow disturbances relatively close to the proposed sampling location, a total of 24 traverse points was used during the gas flow measurements.

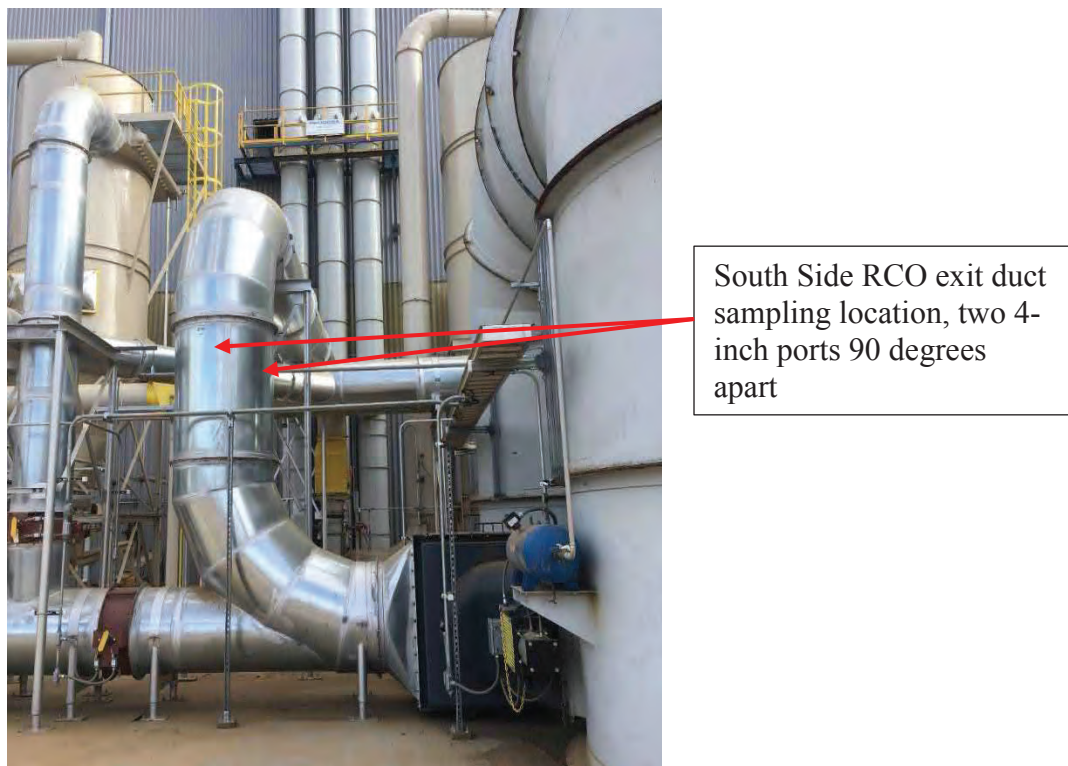


Figure 2-5. RCO 1 Exit Duct, South Side of the Pellet Cooler Building

## 2.2 Sampling Point Determination—EPA Method 1

The number and location of the traverse points used in the Method, 5/202 tests were determined according to the procedures outlined in U.S. EPA Reference Method 1. No traverse points were located within 1.0 inch of the stack wall.

## 2.3 Flue Gas Velocity and Volumetric Flow Rate—EPA Method 2

The flue gas velocity and volumetric flow rate during all of the emissions tests were determined according to the procedures outlined in U.S. EPA Reference Method 2. Velocity measurements were made using S-type Pitot tubes conforming to the geometric specifications outlined in Method 2. Accordingly, each Pitot tube was assigned a coefficient of 0.84. Velocity pressures were measured with fluid manometers. Effluent gas temperatures were measured with chromel-alumel thermocouples attached to digital readouts. A cyclonic flow check was performed at the sampling locations prior to testing.

## 2.4 Flue Gas Moisture Content—EPA Method 4

The flue gas moisture contents during each emissions test were determined in conjunction with each sampling train according to the sampling and analytical procedures outlined in EPA Method 4. The impingers were connected in series and contained reagents as listed in each of the method descriptions included in this protocol. The impingers were contained in an ice bath to assure

condensation of the flue gas stream moisture. Any moisture that was not condensed in the impingers was captured in the silica gel; therefore, all moisture was weighed and entered into moisture content calculations.

In addition to the Method 4 test results, Air Control Techniques, P.C. calculated the moisture content based on the average stack temperature at the sampling location. The calculated moisture content was compared with the measured value. The lower of the two moisture levels was used in the emission calculations.

## 2.5 Filterable and Condensable Particulate Matter—EPA Method 5 and Method 202

Air Control Techniques, P.C. used EPA Reference Methods 5 and 202 to determine filterable and condensable particulate matter emissions from the Dryer/RTO stack and from the Dry Hammermill stack. The testing was conducted in accordance with all applicable EPA sampling and quality assurance requirements. The test program consisted of a set of three one-hour test runs at both the Dryer/RTO Stack (S1) and the Dry Hammermill Stack (S3). The average of the three test runs at each source was computed.

**Sample Collection**—Samples were withdrawn isokinetically ( $100\% \pm 10\%$ ) from the source using an EPA Method 5/202 sampling train. The duration of each test run was 60 minutes. The sampling train consisted of a stainless steel nozzle, a heated stainless steel lined probe with an S-type Pitot tube attached, a heated Method 5 filter, the Method 202 sampling train, and a metering console. The filterable particulate matter samples were collected on a glass fiber filter supported by a Teflon frit.

The Method 5 sampling train is shown in Figure 2-6. The four impingers used in the Method 4 moisture measurements were replaced with the Method 202 sampling train shown in Figure 2-7. A temperature sensor (not shown in Figure 2-3) was inserted into the filter housing in direct contact with the gas stream exiting the Method 5 filter.

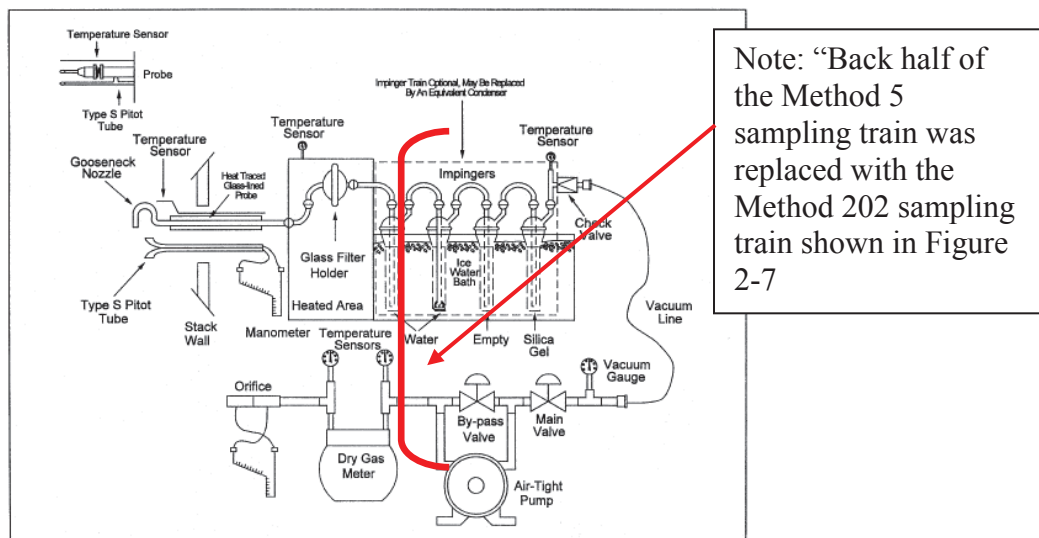


Figure 2-6. Method 5 Sampling Train  
(From Figure 5-1 of U.S. EPA Method 5, 40 CFR Part 60, Appendix A)



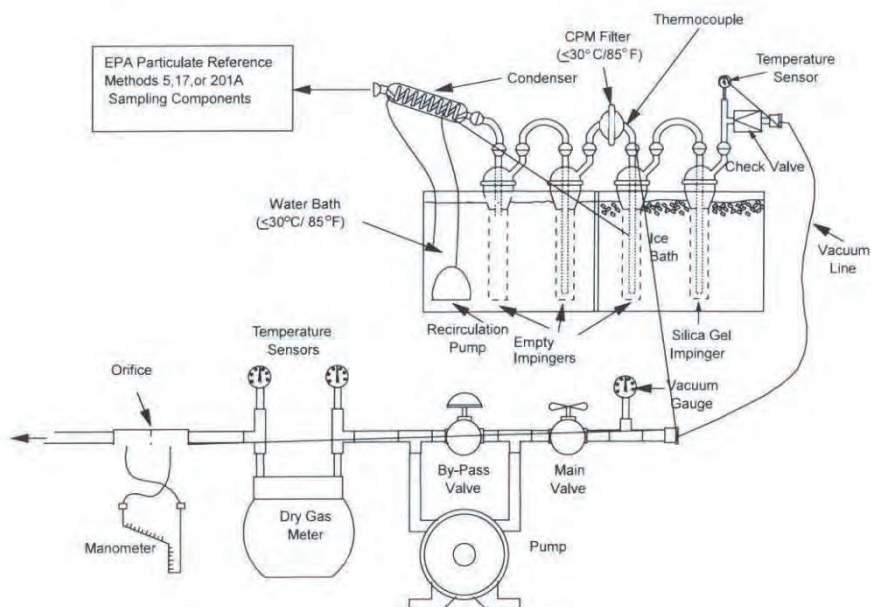


Figure 2-7. Method 202 Sampling Train Following the Method 5 Filter and Before Gas Stream Entry to the Main Valve and Dry Gas Meter

The EPA Method 202 sampling train included a water-cooled indirect heat exchanger, a knock-out impinger, an impinger that was initially dry, a Teflon membrane filter (CPM filter), and a pre-weighed silica gel impinger.

The initial knockout impinger and the initially dry impinger were maintained in a water bath at 65-85°F. The sample gas stream exiting the second impinger and entering the filter were at or below 85°F. Following each test run, the sampling train was purged with ultra-high purity nitrogen at a rate of 14 liters per minute for one hour to remove dissolved sulfur dioxide and other soluble gases.

**Sample Recovery**—The Method 5 filter was removed from the filter holder and placed in a uniquely identified petri dish. The petri dish was sealed for transport to the laboratory. Each impinger was weighed prior to and at the conclusion of each run. The weight gain due to moisture in the gas stream was summed and entered into moisture content calculations in accordance with EPA Reference Method 4. The nozzle, probe, and front half of the filter holder were rinsed and brushed with acetone and collected in a labeled glass jar.

The condenser, impingers, connecting glassware and front half of the CPM filter holder were rinsed with water and added to the collected purged water sample. All components were then rinsed with acetone and hexane and collected in a separate glass jar. The CPM filters were placed in uniquely identified petri dishes.

**Sample Analysis** - EPA Method 5 analytical procedures were used to analyze the filters and front-half acetone rinses for filterable particulate matter.

EPA Method 202 analytical procedures were used to analyze the back-half of the sampling train. The CPM filters were extracted with water and hexane. The inorganic extraction solvent rinses (water) were added to the collected water samples. The organic extraction solvent rinses (hexane) were added to the collected acetone/hexane rinse samples. The water samples were extracted with hexane, and the extraction solvent was combined with the acetone/hexane rinses. The organic fractions (acetone/hexane rinses and the hexane extraction solvent) were evaporated to dryness, desiccated, and weighed until consecutive weights agreed within  $\pm 0.5$  mg. The inorganic fractions (water samples) were evaporated to near dryness and resuspended in 50 mL of deionized water. The sample was then titrated to a neutral pH using sodium hydroxide, evaporated to dryness, desiccated, and weighed until consecutive weights agree within  $\pm 0.5$  mg. The total catch reported for each run was the sum of the organic and inorganic catches minus the field train blank catch weight or 2.0 mg, whichever was less.

As part of the Method 202 tests, Air Control Techniques, P.C. collected reagent blanks of the acetone, hexane, and deionized water used as rinse solvents. Air Control Techniques, P.C. also prepared and analyzed a field recovery blank and a proof blank. The field recovery blank and the proof blank were charged with 100 milliliters of degassed deionized water and assembled and recovered with components that had collected at least one test run.

## **2.6 Oxygen/Carbon Dioxide, Nitrogen Oxides, Carbon Monoxide, and Volatile Organic Compounds—EPA Methods 3A, 7E, 10, 18, and 25A**

The sampling and analytical procedures for O<sub>2</sub>/CO<sub>2</sub>, CO, VOCs, and NO<sub>x</sub> at the Dryer/RTO Stack (S1) and for O<sub>2</sub>/CO<sub>2</sub> and VOC at the Dry Hammermill Stack (S3) were conducted in accordance with EPA Methods 3A, 7E, 10, and 25A. The measurement system consisted of a sample acquisition system, the individual gas analyzers, and a data acquisition system (DAS).

The sample acquisition system included an in-stack probe, a heated out-of-stack glass mat filter for particulate matter removal, a condenser, and a sample line leading to the continuous emission monitors in the mobile laboratory. All components of the sample acquisition system that contacted the sampled gas were constructed of Type 316 stainless steel or Teflon®. The sampled gas was continuously extracted from a central point within the duct at a constant rate ( $\pm 10\%$ ) for the duration of each test run. Figure 2-8 provides a drawing of the CEM sampling system.

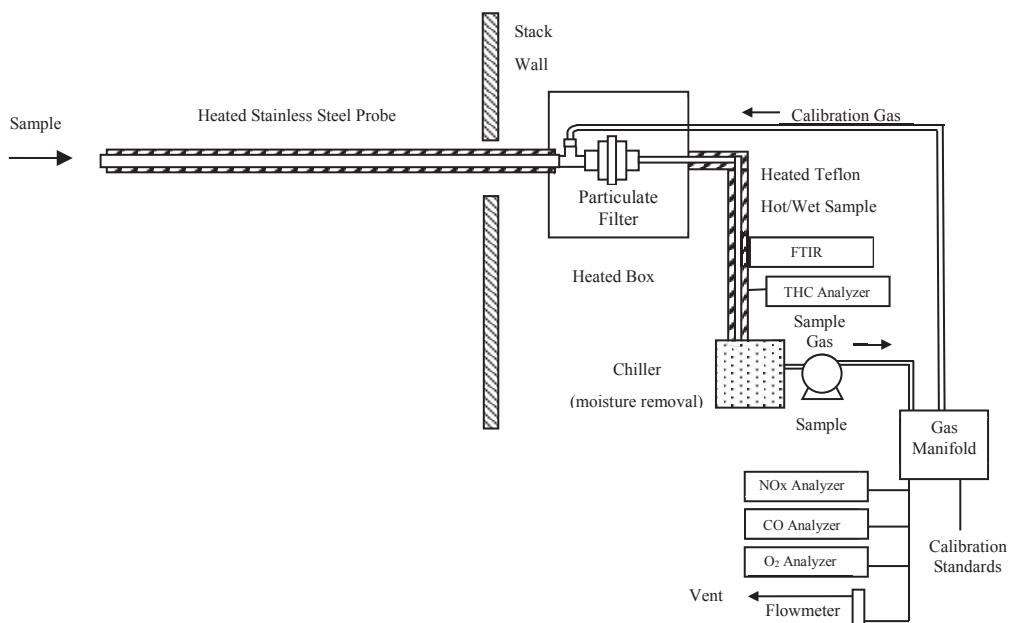


Figure 2-8. CEM Sampling System

A portion of the sample gas was routed through the distribution manifold board for delivery to the gas analyzers. The configuration of the sampling acquisition system allowed for the injection of gas standards directly to the analyzers or through the entire sampling system. All pretest and posttest calibration procedures were performed as outlined in the applicable EPA Reference Methods.

All of the gas standards were prepared according to the test methods using EPA Protocol procedures. Copies of the certificate of analysis documents for the gas standards used during the test program were available onsite and are provided in the emissions test report. The calibration gas concentrations are listed in Table 2-1 through 2-3. The analyzers used in this test program are listed in Table 2-4.

| Table 2-1. Gas Cylinder Concentration Ranges, Dec. 4-5, 2018 Tests |                    |                     |           |                       |                         |
|--------------------------------------------------------------------|--------------------|---------------------|-----------|-----------------------|-------------------------|
| Parameter                                                          | O <sub>2</sub> , % | CO <sub>2</sub> , % | CO, ppmvd | VOC, ppmvd as propane | NO <sub>x</sub> , Ppmvd |
| Zero Gas                                                           | 0.0                | 0.0                 | 0.0       | 0.0                   | 0.0                     |
| Low-Level Gas                                                      | NA                 | NA                  | NA        | 30.07                 | NA                      |
| Mid-Level Gas                                                      | 11.05              | 9.95                | 226.4     | 52.38                 | 48.0                    |
| High-Level Gas                                                     | 21.99              | 18.22               | 450       | 85.84                 | 89.5                    |
| Calibration Span                                                   | 21.99              | 18.22               | 450       | 100                   | 89.5                    |

| Table 2-2. Gas Cylinder Concentration Ranges, January 16, 2019 Tests |                    |                     |           |                       |                         |
|----------------------------------------------------------------------|--------------------|---------------------|-----------|-----------------------|-------------------------|
| Parameter                                                            | O <sub>2</sub> , % | CO <sub>2</sub> , % | CO, ppmvd | VOC, ppmvd as Propane | NO <sub>x</sub> , Ppmvd |
| Zero Gas                                                             | 0.0                | 0.0                 | 0.0       | 0.0                   | 0.0                     |
| Low-Level Gas                                                        | NA                 | NA                  | NA        | 25.5                  | NA                      |
| Mid-Level Gas                                                        | 11.05              | 9.95                | 125.6     | 52.38                 | 48.0                    |
| High-Level Gas                                                       | 21.99              | 18.22               | 226.4     | 85.84                 | 89.5                    |
| Calibration Span                                                     | 21.99              | 18.22               | 450       | 100                   | 89.5                    |

| Table 2-3. Gas Cylinder Concentration Ranges, March 7, 2019 Tests |                    |                     |           |                       |                         |
|-------------------------------------------------------------------|--------------------|---------------------|-----------|-----------------------|-------------------------|
| Parameter                                                         | O <sub>2</sub> , % | CO <sub>2</sub> , % | CO, ppmvd | VOC, ppmvd as Propane | NO <sub>x</sub> , ppmvd |
| Zero Gas                                                          | 0.0                | 0.0                 | 0.0       | 0.0                   | 0.0                     |
| Low-Level Gas                                                     | NA                 | NA                  | NA        | 25.7                  | NA                      |
| Mid-Level Gas                                                     | 11.05              | 10.0                | 46.1      | 50.2                  | 49.8                    |
| High-Level Gas                                                    | 21.8               | 18.2                | 89.5      | 85.8                  | 89.5                    |
| Calibration Span                                                  | 21.8               | 18.2                | 100       | 100                   | 89.5                    |

| Table 2-4. Test Program Analyzers |                       |        |                                |         |
|-----------------------------------|-----------------------|--------|--------------------------------|---------|
| Analyte                           | Manufacturer          | Model  | Measurement Principle          | Range   |
| O <sub>2</sub>                    | California Analytical | 200    | Paramagnetic                   | 25 %    |
| CO <sub>2</sub>                   | California Analytical | 200    | Gas Filter Correlation<br>NDIR | 20 %    |
| VOC                               | California Analytical | 200M   | Flame Ionization               | 100 ppm |
| NO <sub>x</sub>                   | Teledyne/API          | T200H  | Chemiluminescent               | 100 ppm |
| CO                                | Teledyne/API          | 300 EM | NDIR                           | 500 ppm |

The CO and NO<sub>x</sub> emissions were calculated on a pound per hour basis. The NO<sub>x</sub> emissions were calculated based on the molecular weight of NO<sub>2</sub>.

Outputs from the individual emission monitors were connected to a computerized data acquisition system. Outputs from the analyzer were sent to a portable computer via a National Instruments<sup>TM</sup> FieldPoint controller. The signals were downloaded to a STRATA<sup>®</sup> software



program every two seconds. The two-second readings were averaged for the duration of the test run.

Prior to the start of the emission tests, Air Control Techniques, P.C. conducted a stratification test in accordance with Section 8.1.2 of U.S. EPA Method 7E at the dryer/RTO sampling location. Sampling was conducted for a duration that exceeded twice the maximum system response time at each point. The point-to-point variations did not differ from the mean concentration by more than  $\pm 5\%$  or 0.5 ppm. Accordingly, the gas streams were classified as unstratified, and sampling was conducted at a single point.

## 2.7 FTIR Sampling System

Sample gas was continuously passed through a sampling system, which included an in-stack probe, a heated out-of-stack glass mat filter for particulate matter removal, a Teflon® heat-traced sample line, a MIDAC Fourier Transform Infrared (FTIR) spectrometer, a Teflon® heated-head pump, and a gas manifold board as shown in Figure 2-9. All components of the sample acquisition system that contacted the sampled gas were Type 316 stainless steel or Teflon®. All components of the sampling system and the FTIR cell were maintained at or above 180° C. Air Control Techniques, P.C. ensured that the sampling system contained no “cold spots” to prevent loss of the target analytes. The sampling rate was maintained at greater than 10 liters per minute.

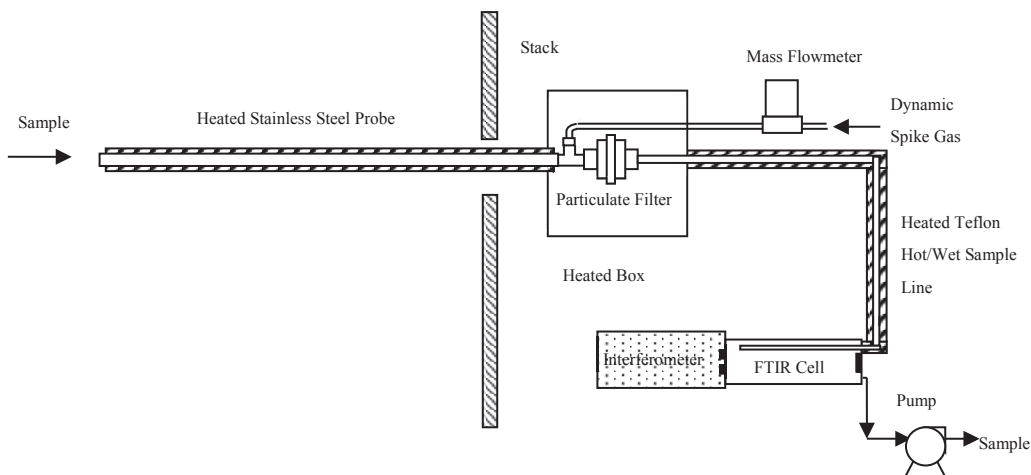


Figure 2-9. Method 320/321 Sampling System

The FTIR system included a MIDAC Corporation (Costa Mesa, CA) I-2001 spectrometer equipped with a heated, nominal 10-meter path absorption cell, a potassium bromide (KBr) beam splitter, zinc selenide (ZnSe) non-hygroscopic windows, and a liquid nitrogen-cooled Mercury Cadmium Telluride detector. Measurements were made using a MIDAC Model I-2001 high resolution Michelson interferometer with AutoQuant Pro V.4.0.0.136 software. Sampled gas was continuously passed through the sampling system, and sample spectra (based on 56 co-added interferograms) were recorded every minute. The system’s nominal spectral resolution

was  $0.5\text{ cm}^{-1}$ . Samples and standards were analyzed at temperatures greater than  $120^{\circ}\text{C}$  and near ambient pressures.

The inside walls of the cells were polished stainless steel to minimize interaction of the sample with the cell walls, and the cell mirrors were bare gold. The gas pressure in the FTIR sample cell was monitored with a pressure transducer connected directly to the sample cell. The heated sample cell was wrapped in an insulating thermal jacket, and the temperature was controlled with type J thermocouples. The absorption cell volume was approximately 2 liters.

The FTIR system operated via a portable computer. A data archive storage system (USB Mass Storage Drive) was used for data backup. All interferograms, single beams, absorbance spectra, and background single beams were stored and archived. The Air Control Techniques, P.C. FTIR field operator documented the sampling parameters throughout the test program including the filename, time, cell pressure, cell temperature, spectra scan rate, corresponding background, and any relevant notes.

**Spectral Analysis**—Air Control Techniques used the program AutoquantPro™ Version 4.0.0.136 (©Midac Corporation) to collect and analyze all the infrared field data. The program allows the development and storage of analytical methods for analysis of spectral data (absorbance) files. The reference spectra used for these analyses were developed by MIDAC Corporation, EPA, and Air Control Techniques, P.C. One method for the task of determining the absorption path length and at least one additional method for determining the concentrations of the target compounds was developed for the test program.

Air Control Techniques, P.C. selected the analytical wavelengths and conducted analyses for analytical uncertainty and detection limit determination using reference spectra standards and prepared the computerized analytical programs for measuring HCl, methanol, formaldehyde, and acetaldehyde concentrations. The reference spectra used for these analyses were developed by EPA, Air Control Techniques, P.C., and the MIDAC Corporation. Prior to testing, an evaluation of possible analytical interferents (e.g.,  $\text{H}_2\text{O}$ ,  $\text{CO}_2$ , CO, pinenes) for the gas stream was determined. Reference spectra of the possible interferents were included in the modeling program to minimize analytical uncertainty and detection limits of the target compounds. Water spectra were recorded onsite with the FTIR instrument used for the field testing to simulate the actual gas stream moisture. The recorded water spectra were included as the primary spectra for modeling.

The sampling method was adjusted following the test program to minimize interferences, reduce the detection limits, and increase the measurement accuracy of the target compounds. The method adjustments included the addition of water spectra collected during the test program.

**Minimum Detectable Concentrations**—The practical minimum detectable concentration (MDC) is instrument, compound, and interference specific. The actual sensitivity of the FTIR measurement system for the individual target analytes depends upon the specific infrared absorptivity (signal) and wavelength, the analysis region for each target analyte, the amount of instrument noise, the concentration of unaccounted interfering compounds in the sample gas, and the amount of spectral overlap imparted by these compounds in the wavelength region(s) used for the quantification of the target analytes.

The detection limit is the lowest concentration of an analyte for which its overall fractional uncertainty is required to be less than its analytical uncertainty limit. The MDC was calculated based on the Standard Error of the Estimated Concentration, or SEC, also known as the Marginal Standard Deviation. The SEC is a measure of the residual spectrum after the scaled reference spectra have been removed from the sample spectrum. The remaining “residual noise” was referenced against each target compound reference spectrum again, and the resulting concentration is the SEC.

The SEC represents the uncertainty of the concentration values for the target analyte and is based on the error variance. The error variance for the case of a single reference spectrum is calculated as the square root of the sums of the squares of the residual spectrum (R) as shown in Equation 1, where  $n$  is the number of observations.

$$\sigma^2 = \frac{\sum_i R_i^2}{(n-1)} \quad \text{Equation 1}$$

The SEC is calculated based on the error variance, the reference spectra concentration (C), and the spectrum (A).

$$SEC = \frac{\sigma C}{\sqrt{\sum_i A_i^2}} \quad \text{Equation 2}$$

The MDC values were calculated as two times the SEC, which provides greater than a 95% confidence interval.

**Quality Assurance and Quality Control** - A linearity test was performed on the detector. Calibration transfer standard (CTS) spectra were compared at three aperture settings. The CTS band areas agreed to within the uncertainty of the cylinder standard ( $\pm 2\%$ ) and the RMSD noise in the system.

Air Control Techniques, P.C. conducted numerous on-site quality assurance checks including single beam backgrounds, CTS spectra tests, and dynamic analyte spiking. During testing, Air Control Techniques, P.C. conducted a quality assurance review of the spectral data. The review included visual inspection of the sample spectra against the reference spectra. Periodically, the target analyte concentrations were calculated separately and compared with the analytical results.

The FTIR extractive sampling system was leak checked from the probe to the pump outlet using a rotameter. A leak check was performed on the FTIR spectrometer cell under maximum vacuum and greater than ambient pressure for greater than two minutes. The cell leak was less than 4 percent of the cell volume.

Sample spectra were divided point-by-point by a 128-scan background recorded using UHP nitrogen. The single beam spectrum was constantly monitored, and a new background was generated at the beginning and end of each test day or if the signal transmittance (relative to the

background) changed by 5 percent or more (absorbance = -0.02 to 0.02) in any analytical spectral region indicating component build-up on the optical surfaces or alignment-related baseline shifts.

CTS tests were performed prior to and following each test run. CTS spectra were collected at the sampling resolution using the same optical configuration as for sample spectra. A cylinder of 100.9 ppm ethylene in nitrogen served as the CTS. The CTS gas was introduced to the FTIR and allowed to reach steady state. The CTS was used to determine the effective cell path length based on comparisons of the “field” CTS spectra to a laboratory CTS spectrum recorded by MIDAC.

EPA Method 320, EPA Method 321, and the equivalent ASTM Standard D6348-03 specify several analytical uncertainty parameters that the analyst must calculate to characterize the FTIR system performance including root mean square (RMA) noise. The RMA noise is a measure of the instrument accuracy for the target analyte and is calculated as the root mean square deviation (RMSD) of the absorbance values in the analytical region(s) from the mean absorbance value in the same region(s). The RMSD in the noise should be less than one tenth of the minimum analyte peak absorbance of sample or MDC in the target analytical region.

### 3. SUMMARY AND DISCUSSIONS OF RESULTS

#### 3.1 Dryer/RTO Test Results

**Objectives and Test Matrix**—The objective of the test program was to measure air emissions exiting the Dryer/RTO stack. A matrix of the test methods used in this test program is provided in Table 3-1.

| Table 3-1. Dryer/RTO Tests |                     |                                          |                |                    |                                 |
|----------------------------|---------------------|------------------------------------------|----------------|--------------------|---------------------------------|
| Stack                      | EPA Test Method     | Target Analyte                           | Number of Runs | Run Times, Minutes | Analytical Measurement          |
| S1<br>Dryer-<br>RTO        | Methods 1, 2, and 4 | Stack Gas Volumetric Flow Rate           | 3              | 60                 | Velocity. Pressure, Gravimetric |
|                            | Method 3A           | Oxygen and Carbon Dioxide                | 3              | 60                 | Paramagnetic and NDIR           |
|                            | Method 5            | Filterable Particulate Matter            | 3              | 60                 | Gravimetric                     |
|                            | Method 7E           | Nitrogen Oxides as NO <sub>2</sub>       | 3              | 60                 | Chemiluminescence               |
|                            | Method 10           | Carbon Monoxide                          | 3              | 60                 | NDIR                            |
|                            | Method 18           | Methane                                  | 3              | 60                 | GC                              |
|                            | Method 25A          | VOCs as Propane                          | 3              | 60                 | FID                             |
|                            | Method 202          | Condensable Particulate Matter           | 3              | 60                 | Gravimetric                     |
|                            | Method 320          | Methanol, Formaldehyde, and Acetaldehyde | 3              | 60                 | FTIR                            |
|                            | Method 321          | HCl                                      | 3              | 60                 | FTIR                            |

**Summary of Results**—The results of the particulate matter, VOC, CO, and NO<sub>x</sub> tests are summarized in Table 3-2. The VOC data are expressed as propane. The NO<sub>x</sub> data are expressed as NO<sub>2</sub>. Methane, a non-VOC compound detected by Method 25A, was measured using Method 18. All of the methane analyses were between the laboratory minimum detection limit and the limit of quantification. Accordingly, the methane data were considered to be negligible and were not subtracted from the Method 25A VOC data.

| Table 3-2. Test Results Summary, Dryer/RTO Stack   |           |             |             |         |
|----------------------------------------------------|-----------|-------------|-------------|---------|
| Parameter                                          | Run 1     | Run 2       | Run 3       | Average |
| Test date                                          | 12/5/2018 | 12/5/2018   | 12/5/2018   | N/A     |
| Test time                                          | 8:40-9:47 | 10:47-11:57 | 12:15-13:27 | N/A     |
| Production Rate, ODT/hour                          | 67.0      | 64.1        | 64.7        | 65.3    |
| Gas Flow Rate, DSCFM                               | 74,759    | 71,425      | 74,025      | 73,403  |
| Gas Flow Rate, ACFM                                | 166,531   | 154,608     | 158,373     | 159,837 |
| Oxygen Concentration, % dry                        | 12.53     | 12.78       | 13.40       | 12.90   |
| Carbon Dioxide Concentration, % dry                | 7.89      | 7.56        | 7.12        | 7.52    |
| Stack Gas Moisture Concentration, %                | 39.49     | 38.68       | 37.17       | 38.45   |
| Stack Temperature, °F                              | 252.2     | 241.3       | 250.2       | 247.9   |
| <b>Filterable Particulate Matter Emissions</b>     |           |             |             |         |
| Emission Rate, Lbs./hour                           | 0.57      | 0.34        | 0.13        | 0.35    |
| Emission Factor, Lbs./ODT                          | 0.0085    | 0.0053      | 0.0020      | 0.0053  |
| <b>Condensable Particulate Matter Emissions</b>    |           |             |             |         |
| Emission Rate, Lbs./hour                           | 1.7       | 1.5         | 1.3         | 1.5     |
| Emission Factor, Lbs./ODT                          | 0.025     | 0.023       | 0.021       | 0.023   |
| <b>Total Particulate Matter Emissions</b>          |           |             |             |         |
| Emission Rate, Lbs./hour                           | 2.3       | 1.8         | 1.5         | 1.9     |
| Emission Factor, Lbs./ODT                          | 0.034     | 0.028       | 0.023       | 0.028   |
| <b>Non-VOC Compounds</b>                           |           |             |             |         |
| Methane, ppm <sub>vd</sub> as methane <sup>1</sup> | 1.14      | 1.14        | 1.54        | 1.27    |
| <b>VOC Emissions as Propane</b>                    |           |             |             |         |
| Concentration, ppm <sub>vd</sub> as propane        | 10.2      | 11.2        | 9.30        | 10.2    |
| Emission Rate, Lbs./hour as propane                | 5.3       | 5.5         | 4.7         | 5.2     |
| Emission, Lbs./ODT as propane                      | 0.078     | 0.086       | 0.073       | 0.079   |
| <b>Carbon Monoxide Emissions</b>                   |           |             |             |         |
| Concentration, ppm <sub>vd</sub>                   | 29.2      | 35.4        | 27.9        | 30.8    |
| Emissions, Lbs./hour                               | 9.5       | 11.0        | 9.0         | 9.9     |
| Emission Rate, Lbs./ODT                            | 0.14      | 0.17        | 0.14        | 0.15    |
| <b>Nitrogen Oxide Emissions</b>                    |           |             |             |         |
| NO <sub>x</sub> Concentration, ppm <sub>vd</sub>   | 38.5      | 34.4        | 32.6        | 35.2    |
| Emissions, Lbs./hour as NO <sub>2</sub>            | 20.6      | 17.6        | 17.3        | 18.5    |
| Emission Rate, Lbs. NO <sub>2</sub> /ODT           | 0.31      | 0.27        | 0.27        | 0.28    |

<sup>1</sup> All methane analyses were between the laboratory minimum detection limit and the limit of quantification.

Table 3-3 presents the HAP emissions data measured in accordance with Methods 320 and 321. All concentrations are expressed on a ppm dry basis (ppmvd).

| Table 3-3. HAP Test Results, Dryer/RTO Stack |           |             |             |         |
|----------------------------------------------|-----------|-------------|-------------|---------|
| Parameter                                    | Run 1     | Run 2       | Run 3       | Average |
| Test date                                    | 12/5/2018 | 12/5/2018   | 12/5/2018   | N/A     |
| Test time                                    | 8:40-9:47 | 10:47-11:57 | 12:15-13:27 | N/A     |
| Production Rate, ODT/hour                    | 67.0      | 64.1        | 64.7        | 65.3    |
| <b>Methanol Emissions</b>                    |           |             |             |         |
| Concentration, ppm <sub>vd</sub>             | 0.0       | 0.0         | 0.0         | 0.0     |
| Emission Rate, Lbs./hour                     | 0.0       | 0.0         | 0.0         | 0.0     |
| Emission Lbs./ODT                            | 0.0       | 0.0         | 0.0         | 0.0     |
| <b>Formaldehyde Emissions</b>                |           |             |             |         |
| Concentration, ppm <sub>vd</sub>             | 0.97      | 0.98        | 0.89        | 0.95    |
| Emission Rate, Lbs./hour                     | 0.34      | 0.33        | 0.32        | 0.33    |
| Emission Lbs./ODT                            | 0.0051    | 0.0052      | 0.0049      | 0.0050  |
| <b>Acetaldehyde Emissions</b>                |           |             |             |         |
| Concentration, ppm <sub>vd</sub>             | 0.0       | 0.0         | 0.0         | 0.0     |
| Emission Rate, Lbs./hour                     | 0.0       | 0.0         | 0.0         | 0.0     |
| Emission Lbs./ODT                            | 0.0       | 0.0         | 0.0         | 0.0     |
| <b>HCl Emissions</b>                         |           |             |             |         |
| Emission Factor, ppm <sub>vd</sub>           | 0.0       | 0.0         | 0.0         | 0.0     |
| Emission Rate, Lbs./hour                     | 0.0       | 0.0         | 0.0         | 0.0     |
| Emission Lbs./ODT                            | 0.0       | 0.0         | 0.0         | 0.0     |
| <b>Total HAP Emissions</b>                   |           |             |             |         |
| Emission Rate, Lbs./hour, 4 analytes         | 0.34      | 0.33        | 0.32        | 0.33    |
| Emission Lbs./ODT                            | 0.0051    | 0.0052      | 0.0049      | 0.0050  |

All of the HAPs emissions were low as expected due to the high operating temperature of the RTO.



### 3.2 Dry Hammermill Test Results

**Objectives and Test Matrix**—The objective of the test program was to measure air emissions exiting the Dry Hammermill Stack (S3). A matrix of the test methods used in this test program is provided in Table 3-4

| Table 3-4. Dry Hammermill Stack Tests |                     |                                          |                |                    |                                 |
|---------------------------------------|---------------------|------------------------------------------|----------------|--------------------|---------------------------------|
| Stack                                 | EPA Test Method     | Target Analyte                           | Number of Runs | Run Times, Minutes | Analytical Measurement          |
| S3<br>DHM                             | Methods 1, 2, and 4 | Stack Gas Volumetric Flow Rate           | 3              | 60                 | Velocity. Pressure, Gravimetric |
|                                       | Method 3A           | Oxygen and Carbon Dioxide                | 3              | 60                 | Paramagnetic and NDIR           |
|                                       | Method 5            | Filterable Particulate Matter            | 3              | 60                 | Gravimetric                     |
|                                       | Method 25A          | VOCs as Propane                          | 3              | 60                 | FID                             |
|                                       | Method 202          | Condensable Particulate Matter           | 3              | 60                 | Gravimetric                     |
|                                       | Method 320          | Methanol, Formaldehyde, and Acetaldehyde | 3              | 60                 | FTIR                            |
|                                       | Method 321          | HCl                                      | 3              | 60                 | FTIR                            |

**Summary of Test Results**—The results of the tests conducted at the dry hammermill stack (S3) are summarized in Tables 3-5 and 3-6.

| Table 3-5. Test Results Summary, DHM Stack      |            |             |             |         |
|-------------------------------------------------|------------|-------------|-------------|---------|
| Parameter                                       | Run 1      | Run 2       | Run 3       | Average |
| Test date                                       | 12/4/2018  | 12/4/2018   | 12/4/2018   | N/A     |
| Test time                                       | 9:15-10:23 | 11:17-12:25 | 13:04-14:12 | N/A     |
| Production Rate, ODT/hour                       | 65.4       | 64.90       | 64.6        | 65.0    |
| Gas Flow Rate, DSCFM                            | 62,212     | 64,491      | 64,891      | 63,865  |
| Gas Flow Rate, ACFM                             | 68,874     | 72,432      | 72,790      | 71,365  |
| Oxygen Concentration, % dry                     | 20.97      | 20.94       | 20.91       | 20.94   |
| Carbon Dioxide Concentration, % dry             | 0.12       | 0.12        | 0.11        | 0.12    |
| Stack Gas Moisture Concentration, %             | 3.94       | 4.22        | 4.33        | 4.17    |
| Stack Temperature, °F                           | 102.0      | 108.5       | 107.1       | 105.9   |
| <b>Filterable Particulate Matter Emissions</b>  |            |             |             |         |
| Emission Rate, Lbs./hour                        | 9.7        | 9.5         | 6.9         | 8.7     |
| Emission Factor, Lbs./ODT                       | 0.15       | 0.15        | 0.11        | 0.13    |
| <b>Condensable Particulate Matter Emissions</b> |            |             |             |         |
| Emission Rate, Lbs./hour                        | 0.14       | 0.08        | 0.38        | 0.20    |
| Emission Factor, Lbs./ODT                       | 0.0021     | 0.0012      | 0.0059      | 0.0031  |
| <b>Total Particulate Matter Emissions</b>       |            |             |             |         |
| Emission Rate, Lbs./hour                        | 9.8        | 9.6         | 7.3         | 8.9     |
| Emission Factor, Lbs./ODT                       | 0.15       | 0.15        | 0.11        | 0.14    |
| <b>VOC Emissions as Propane</b>                 |            |             |             |         |
| Concentration, ppm <sub>vd</sub> as propane     | 68.0       | 87.5        | 86.1        | 80.5    |
| Emission Rate, Lbs./hour as propane             | 29.1       | 38.8        | 38.4        | 35.4    |
| Emission, Lbs./ODT as propane                   | 0.44       | 0.60        | 0.59        | 0.55    |

Table 3-6 presents the HAP emissions data measured in accordance with Methods 320 and 321. All concentrations are expressed on a ppm dry basis.

| Table 3-6. HAP Test Results, Dry Hammermill Stack |            |             |             |         |
|---------------------------------------------------|------------|-------------|-------------|---------|
| Parameter                                         | Run 1      | Run 2       | Run 3       | Average |
| Test date                                         | 12/4/2018  | 12/4/2018   | 12/4/2018   | N/A     |
| Test time                                         | 9:15-10:23 | 11:17-12:25 | 13:04-14:12 | N/A     |
| Production Rate, tons/hour                        | 65.4       | 64.9        | 64.6        | 65.0    |
| <b>Methanol Emissions</b>                         |            |             |             |         |
| Concentration, ppm <sub>vd</sub>                  | 0.80       | 1.11        | 1.08        | 1.00    |
| Emission Rate, Lbs./hour                          | 0.25       | 0.36        | 0.35        | 0.32    |
| Emission Rate, Lbs./ODT                           | 0.0038     | 0.0055      | 0.0054      | 0.0049  |
| <b>Formaldehyde Emissions</b>                     |            |             |             |         |
| Concentration, ppm <sub>vd</sub>                  | 0.15       | 0.0         | 0.0         | 0.05    |
| Emission Rate, Lbs./hour                          | 0.045      | 0.0         | 0.0         | 0.015   |
| Emission Rate, Lbs./ODT                           | 0.00068    | 0.0         | 0.0         | 0.00023 |
| <b>Acetaldehyde Emissions</b>                     |            |             |             |         |
| Concentration, ppm <sub>vd</sub>                  | 0.0        | 0.0         | 0.0         | 0.00    |
| Emission Rate, Lbs./hour                          | 0.0        | 0.0         | 0.0         | 0.00    |
| Emission Rate, Lbs./ODT                           | 0.0        | 0.0         | 0.0         | 0.00    |
| <b>HCl Emissions</b>                              |            |             |             |         |
| Emission Factor, ppm <sub>vd</sub>                | 0.13       | 0.0         | 0.0         | 0.04    |
| Emission Rate, Lbs./hour                          | 0.046      | 0.0         | 0.0         | 0.015   |
| Emission Rate, Lbs./ODT                           | 0.00070    | 0.0         | 0.0         | 0.00023 |
| <b>Total HAP Emissions</b>                        |            |             |             |         |
| Emission Rate, Lbs./hour, 4 analytes              | 0.35       | 0.36        | 0.35        | 0.35    |
| Emission Rate, Lbs./ODT, 4 analytes               | 0.0052     | 0.0055      | 0.0054      | 0.0054  |

### 3.3 RCO 1 and RCO 2 Test Results

**Objectives and Test Matrix**—The objective of the test program was to measure air emissions exiting the Pellet Cooler Stacks S5 and S6. A matrix of the test methods used in this test program is provided in Table 3-7

| Table 3-7. RCO 1 and RCO 2 Tests |                     |                                          |                |                    |                                 |
|----------------------------------|---------------------|------------------------------------------|----------------|--------------------|---------------------------------|
| Stack                            | EPA Test Method     | Target Analyte                           | Number of Runs | Run Times, Minutes | Analytical Measurement          |
| S5 and S6 Pellet Coolers         | Methods 1, 2, and 4 | Stack Gas Volumetric Flow Rate           | 3              | 60                 | Velocity. Pressure, Gravimetric |
|                                  | Method 3A           | Oxygen and Carbon Dioxide                | 3              | 60                 | Paramagnetic and NDIR           |
|                                  | Method 5            | Filterable Particulate Matter            | 3              | 60                 | Gravimetric                     |
|                                  | Method 7E           | Nitrogen Oxides                          | 3              | 60                 | Chemiluminescent                |
|                                  | Method 10           | Carbon Monoxide                          | 3              | 60                 | Infrared                        |
|                                  | Method 18           | Methane                                  | 3              | 60                 | GC                              |
|                                  | Method 25A          | VOCs as Propane                          | 3              | 60                 | FID                             |
|                                  | Method 202          | Condensable Particulate Matter           | 3              | 60                 | Gravimetric                     |
|                                  | Method 320          | Methanol, Formaldehyde, and Acetaldehyde | 3              | 60                 | FTIR                            |
|                                  | Method 321          | HCl                                      | 3              | 60                 | FTIR                            |

The results of the tests conducted on the RCO 1 Stack on March 7, 2019 are summarized in Tables 3-8 and 3-9. The VOC, CO, and NO<sub>x</sub> data are expressed on a ppm dry basis. The VOC data are on a propane basis. The NO<sub>x</sub> data are on a NO<sub>2</sub> basis.

| Table 3-8. Test Results Summary, RCO 1, Pellet Cooler Stack S5 |            |             |             |         |
|----------------------------------------------------------------|------------|-------------|-------------|---------|
| Parameter                                                      | Run 1      | Run 2       | Run 3       | Average |
| Test date                                                      | 3/7/19     | 3/7/19      | 3/7/19      | N/A     |
| Test time                                                      | 9:10-10:15 | 11:08-12:22 | 13:04-14:18 | N/A     |
| Production Rate, ODT/hour                                      | 39.5       | 40.3        | 40.5        | 40.1    |
| Gas Flow Rate, DSCFM                                           | 32,231     | 31,820      | 30,659      | 31,570  |
| Gas Flow Rate, ACFM                                            | 39,708     | 41,200      | 41,040      | 40,650  |
| Oxygen Concentration, % dry                                    | 20.7       | 20.6        | 20.53       | 20.64   |
| Carbon Dioxide Concentration, % dry                            | 0.0        | 0.0         | 0.01        | 0.00    |
| Stack Gas Moisture Concentration, %                            | 5.97       | 6.34        | 7.02        | 6.44    |
| Stack Temperature, °F                                          | 155.7      | 184.5       | 201.5       | 180.6   |
| <b>Filterable Particulate Matter Emissions</b>                 |            |             |             |         |
| Emission Rate, Lbs./hour                                       | 0.17       | 0.17        | 0.10        | 0.14    |
| Emission Factor, Lbs./ODT                                      | 0.0043     | 0.0042      | 0.0024      | 0.0036  |
| <b>Condensable Particulate Matter Emissions</b>                |            |             |             |         |
| Emission Rate, Lbs./hour                                       | 0.19       | 0.14        | 0.22        | 0.18    |
| Emission Factor, Lbs./ODT                                      | 0.0047     | 0.0035      | 0.0054      | 0.0046  |
| <b>Total Particulate Matter Emissions</b>                      |            |             |             |         |
| Emission Rate, Lbs./hour                                       | 0.36       | 0.31        | 0.32        | 0.32    |
| Emission Factor, Lbs./ODT                                      | 0.0090     | 0.0077      | 0.0078      | 0.0082  |
| <b>VOC Emissions as Propane</b>                                |            |             |             |         |
| Concentration, ppm <sub>vd</sub> as propane                    | 5.52       | 4.78        | 9.52        | 6.61    |
| Emission Rate, Lbs./hour as propane                            | 1.2        | 1.0         | 2.0         | 1.4     |
| Emission, Lbs./ODT as propane                                  | 0.031      | 0.026       | 0.049       | 0.035   |
| <b>NO<sub>x</sub> Emissions</b>                                |            |             |             |         |
| Concentration, ppm <sub>vd</sub>                               | 1.03       | 1.21        | 1.16        | 1.13    |
| Emission Rate, Lbs./hour as NO <sub>2</sub>                    | 0.24       | 0.28        | 0.26        | 0.26    |
| Emission, Lbs./ODT as NO <sub>2</sub>                          | 0.0060     | 0.0069      | 0.0063      | 0.0064  |
| <b>CO Emissions</b>                                            |            |             |             |         |
| Concentration, ppm <sub>vd</sub>                               | 16.68      | 17.93       | 16.73       | 17.11   |
| Emission Rate, Lbs./hour                                       | 2.3        | 2.5         | 2.2         | 2.4     |
| Emission, Lbs./ODT                                             | 0.059      | 0.062       | 0.055       | 0.059   |

Methane, a non-VOC compound detected by Method 25A, was measured using Method 18. All of the methane analyses were between the laboratory minimum detection limit and the limit of quantification. Accordingly, the methane data were considered to be negligible and were not subtracted from the Method 25A VOC data.

Table 3-9 presents the RCO 1 HAP emissions data measured in accordance with Methods 320 and 321. All concentrations are expressed on a ppm dry basis. All of the HAP concentrations were below the detection limits of Method 320 and 321.

| Table 3-9. HAP Test Results, RCO 1, Pellet Cooler Stack S5 |            |             |             |         |
|------------------------------------------------------------|------------|-------------|-------------|---------|
| Parameter                                                  | Run 1      | Run 2       | Run 3       | Average |
| Test date                                                  | 3/7/19     | 3/7/19      | 3/7/19      | N/A     |
| Test time                                                  | 9:10-10:15 | 11:08-12:22 | 13:04-14:18 | N/A     |
| Production Rate, tons/hour                                 | 41.7       | 42.3        | 42.3        | 42.1    |
| <b>Methanol Emissions</b>                                  |            |             |             |         |
| Concentration, ppm <sub>vd</sub>                           | 0.0        | 0.0         | 0.19        | 0.07    |
| Emission Rate, Lbs./hour                                   | 0.0        | 0.0         | 0.031       | 0.010   |
| Emission Rate, Lbs./ODT                                    | 0.0        | 0.0         | 0.00077     | 0.00026 |
| <b>Formaldehyde Emissions</b>                              |            |             |             |         |
| Concentration, ppm <sub>vd</sub>                           | 0.0        | 0.0         | 0.0         | 0.0     |
| Emission Rate, Lbs./hour                                   | 0.0        | 0.0         | 0.0         | 0.0     |
| Emission Rate, Lbs./ODT                                    | 0.0        | 0.0         | 0.0         | 0.0     |
| <b>Acetaldehyde Emissions</b>                              |            |             |             |         |
| Concentration, ppm <sub>vd</sub>                           | 0.0        | 0.0         | 0.0         | 0.0     |
| Emission Rate, Lbs./hour                                   | 0.0        | 0.0         | 0.0         | 0.0     |
| Emission Rate, Lbs./ODT                                    | 0.0        | 0.0         | 0.0         | 0.0     |
| <b>HCl Emissions</b>                                       |            |             |             |         |
| Emission Factor, ppm <sub>vd</sub>                         | 0.0        | 0.0         | 0.0         | 0.0     |
| Emission Rate, Lbs./hour                                   | 0.0        | 0.0         | 0.0         | 0.0     |
| Emission Rate, Lbs./ODT                                    | 0.0        | 0.0         | 0.0         | 0.0     |
| <b>Total HAP Emissions</b>                                 |            |             |             |         |
| Emission Rate, Lbs./hour, 4 analytes                       | 0.0        | 0.0         | 0.0         | 0.01    |
| Emission Rate, Lbs./ODT, 4 analytes                        | 0.0        | 0.0         | 0.0         | 0.00026 |

The results of the tests conducted on the RCO 2 Stack on January 16, 2019 are summarized in Tables 3-10 and 3-11. These tables summarize the data from Runs 3, 4, and 5. The data from Runs 1 and 2 were voided due to post-test leak check problems caused by the difficulty of moving the sampling train in a very space-constrained and awkwardly located sampling port. The data from Runs 1 and 2 are provided in Appendix IIA.

The VOC, CO, and NOx data are expressed on a ppm dry basis. The VOC data are on a propane basis. The NOx data are on a NO2 basis.

| Table 3-10. Test Results Summary, RCO 2, Pellet Cooler Stack S6 |             |             |             |         |
|-----------------------------------------------------------------|-------------|-------------|-------------|---------|
| Parameter                                                       | Run 3       | Run 4       | Run 5       | Average |
| Test date                                                       | 1/16/19     | 1/16/19     | 1/16/19     | N/A     |
| Test time                                                       | 14:07-15:23 | 15:45-16:58 | 18:35-20:01 | N/A     |
| Production Rate, ODT/hour                                       | 25.1        | 25.2        | 22.90       | 24.4    |
| Gas Flow Rate, DSCFM                                            | 22,698      | 22,867      | 22,202      | 22,589  |
| Gas Flow Rate, ACFM                                             | 27,718      | 28,083      | 27,035      | 27,612  |
| Oxygen Concentration, % dry                                     | 20.84       | 20.89       | 20.86       | 20.87   |
| Carbon Dioxide Concentration, % dry                             | 0.054       | 0.019       | 0.17        | 0.081   |
| Stack Gas Moisture Concentration, %                             | 5.12        | 5.02        | 4.54        | 4.90    |
| Stack Temperature, °F                                           | 160.5       | 162.6       | 160.5       | 161.2   |
| <b>Filterable Particulate Matter Emissions</b>                  |             |             |             |         |
| Emission Rate, Lbs./hour                                        | 0.31        | 0.25        | 0.080       | 0.22    |
| Emission Factor, Lbs./ODT                                       | 0.012       | 0.010       | 0.0032      | 0.0086  |
| <b>Condensable Particulate Matter Emissions</b>                 |             |             |             |         |
| Emission Rate, Lbs./hour                                        | 0.17        | 0.07        | 0.07        | 0.10    |
| Emission Factor, Lbs./ODT                                       | 0.0069      | 0.0026      | 0.0029      | 0.0041  |
| <b>Total Particulate Matter Emissions</b>                       |             |             |             |         |
| Emission Rate, Lbs./hour                                        | 0.49        | 0.32        | 0.15        | 0.32    |
| Emission Factor, Lbs./ODT                                       | 0.019       | 0.013       | 0.0064      | 0.013   |
| <b>VOC Emissions as Propane</b>                                 |             |             |             |         |
| Concentration, ppm <sub>vd</sub> as propane                     | 7.30        | 7.93        | 7.03        | 7.42    |
| Emission Rate, Lbs./hour as propane                             | 1.1         | 1.2         | 1.1         | 1.2     |
| Emission, Lbs./ODT as propane                                   | 0.045       | 0.049       | 0.047       | 0.047   |
| <b>NOx Emissions</b>                                            |             |             |             |         |
| Concentration, ppm <sub>vd</sub>                                | 0.87        | 0.95        | 1.01        | 0.94    |
| Emission Rate, Lbs./hour as NO2                                 | 0.14        | 0.16        | 0.16        | 0.15    |
| Emission, Lbs./ODT as NO2                                       | 0.0056      | 0.0062      | 0.0070      | 0.0063  |
| <b>CO Emissions</b>                                             |             |             |             |         |
| Concentration, ppm <sub>vd</sub>                                | 11.36       | 10.26       | 9.52        | 10.38   |
| Emission Rate, Lbs./hour                                        | 1.1         | 1.0         | 0.92        | 1.0     |
| Emission, Lbs./ODT                                              | 0.045       | 0.041       | 0.040       | 0.042   |

Methane, a non-VOC compound detected by Method 25A, was measured using Method 18. All of the methane analyses were between the laboratory minimum detection limit and the limit of quantification. Accordingly, the methane data were considered to be negligible and were not subtracted from the Method 25A VOC data.



There were four process-related interruptions during Run 5. The data summarized in Tables 3-10 and 3-11 include only periods when the process was operating at the indicated production rate.

Table 3-11 presents the HAP emissions data measured in accordance with Methods 320 and 321. All concentrations are expressed on a ppm dry basis.

| Table 3-11. HAP Test Results, RCO 2, Pellet Cooler Stack S6 |             |             |             |         |
|-------------------------------------------------------------|-------------|-------------|-------------|---------|
| Parameter                                                   | Run 3       | Run 4       | Run 5       | Average |
| Test date                                                   | 1/16/19     | 1/16/19     | 1/16/19     | N/A     |
| Test time                                                   | 14:07-15:23 | 15:45-16:57 | 18:37-20:01 | N/A     |
| Production Rate, tons/hour                                  | 25.06       | 25.21       | 22.90       | 24.39   |
| <b>Methanol Emissions</b>                                   |             |             |             |         |
| Concentration, ppm <sub>vd</sub>                            | 0.0         | 0.0         | 0.0         | 0.0     |
| Emission Rate, Lbs./hour                                    | 0.0         | 0.0         | 0.0         | 0.0     |
| Emission Rate, Lbs./ODT                                     | 0.0         | 0.0         | 0.0         | 0.0     |
| <b>Formaldehyde Emissions</b>                               |             |             |             |         |
| Concentration, ppm <sub>vd</sub>                            | 0.46        | 0.46        | 0.76        | 0.56    |
| Emission Rate, Lbs./hour                                    | 0.049       | 0.050       | 0.080       | 0.059   |
| Emission Rate, Lbs./ODT                                     | 0.0020      | 0.0020      | 0.0033      | 0.0025  |
| <b>Acetaldehyde Emissions</b>                               |             |             |             |         |
| Concentration, ppm <sub>vd</sub>                            | 0.0         | 0.0         | 0.0         | 0.0     |
| Emission Rate, Lbs./hour                                    | 0.0         | 0.0         | 0.0         | 0.0     |
| Emission Rate, Lbs./ODT                                     | 0.0         | 0.0         | 0.0         | 0.0     |
| <b>HCl Emissions</b>                                        |             |             |             |         |
| Emission Factor, ppm <sub>vd</sub>                          | 0.0         | 0.0         | 0.0         | 0.0     |
| Emission Rate, Lbs./hour                                    | 0.0         | 0.0         | 0.0         | 0.0     |
| Emission Rate, Lbs./ODT                                     | 0.0         | 0.0         | 0.0         | 0.0     |
| <b>Total HAP Emissions</b>                                  |             |             |             |         |
| Emission Rate, Lbs./hour, 4 analytes                        | 0.05        | 0.05        | 0.08        | 0.059   |
| Emission Rate, Lbs./ODT, 4 analytes                         | 0.0019      | 0.0019      | 0.0034      | 0.0025  |

#### 4.0 QUALITY ASSURANCE AND QUALITY CONTROL

##### 4.1 Particulate Matter Tests, Methods 5 and 202

The Method 5/202 tests met all of the EPA quality assurance requirements. As indicated in Tables 4-1 through 4-4, the isokinetic sampling rates were well within the 90% to 110% range. The sampling train post leak checks were all zero at vacuums that exceeded the maximum run vacuum. The probe, filter, impinger exit, and CPM filter temperatures were all consistent with the EPA methods. The measured cyclonic flow angle in the dryer stack was 0.83 degrees—well within the less than 20 degree requirement specified in Method 1.

| Table 4-1. Method 5/Method 202 Quality Assurance Objectives and Results,<br>Dryer/RTO Stack S1 |                                              |                 |         |         |
|------------------------------------------------------------------------------------------------|----------------------------------------------|-----------------|---------|---------|
| Parameter                                                                                      | Objectives                                   | Test Run Values |         |         |
|                                                                                                |                                              | Run 1           | Run 2   | Run 3   |
| Number of traverse points                                                                      | Method 1 criteria<br>24 points               | 24              | 24      | 24      |
| Sample volume                                                                                  | >30 DSCF                                     | 43.54           | 38.80   | 38.24   |
| Isokinetic sampling rate                                                                       | 90-110%                                      | 106.4           | 99.3    | 94.4    |
| Post-test sample train leak check                                                              | <0.02 DSCF or<br>4% at maximum<br>run vacuum | 0               | 0       | 0       |
| Probe temperatures                                                                             | 248±25°F                                     | 245-260         | 232-267 | 245-261 |
| Filter temperatures                                                                            | 248±25°F                                     | 245-259         | 242-262 | 227-258 |
| Maximum Impinger exit temperatures                                                             | <68°F                                        | 51              | 50      | 51      |
| CPM filter exit temperature                                                                    | 65-85°F                                      | 69-77           | 69-79   | 69-79   |
| Cyclonic flow angle                                                                            | <20 degrees                                  | 0.83            |         |         |

| Table 4-2. Method 5/Method 202 Quality Assurance Objectives and Results,<br>Dry Hammermill Stack S3 |                                        |                 |         |         |
|-----------------------------------------------------------------------------------------------------|----------------------------------------|-----------------|---------|---------|
| Parameter                                                                                           | Objectives                             | Test Run Values |         |         |
|                                                                                                     |                                        | Run 1           | Run 2   | Run 3   |
| Number of traverse points                                                                           | Method 1 criteria, 24 points           | 24              | 24      | 24      |
| Sample volume                                                                                       | >30 DSCF                               | 40.99           | 42.49   | 42.99   |
| Isokinetic sampling rate                                                                            | 90-110%                                | 101.1           | 101.1   | 101.6   |
| Post-test sample train leak check                                                                   | <0.02 DSCF or 4% at maximum run vacuum | 0               | 0       | 0       |
| Probe temperatures                                                                                  | 248±25°F                               | 255-261         | 238-264 | 252-262 |
| Filter temperatures                                                                                 | 248±25°F                               | 235-259         | 247-258 | 252-261 |
| Maximum Impinger exit temperatures                                                                  | <68°F                                  | 50              | 54      | 53      |
| CPM filter exit temperature                                                                         | 65-85°F                                | 69-75           | 69-73   | 71-79   |
| Cyclonic flow angle                                                                                 | <20 degrees                            | 4.1             |         |         |

| Table 4-3. Method 5/Method 202 Quality Assurance Objectives and Results,<br>Pellet Cooler Stack S5, RCO 1 |                                        |                 |         |         |
|-----------------------------------------------------------------------------------------------------------|----------------------------------------|-----------------|---------|---------|
| Parameter                                                                                                 | Objectives                             | Test Run Values |         |         |
|                                                                                                           |                                        | Run 1           | Run 2   | Run 3   |
| Number of traverse points                                                                                 | Method 1 criteria, 24 points           | 24              | 24      | 24      |
| Sample volume                                                                                             | >30 DSCF                               | 47.74           | 47.50   | 46.50   |
| Isokinetic sampling rate                                                                                  | 90-110%                                | 102.6           | 103.4   | 105.1   |
| Post test sample train leak check                                                                         | <0.02 DSCF or 4% at maximum run vacuum | 0 @ 11          | 0 @ 9   | 0 @9.5  |
| Probe temperatures                                                                                        | 248±25°F                               | 245-257         | 245-258 | 225-258 |
| Filter temperatures                                                                                       | 248±25°F                               | 227-256         | 225-256 | 238-260 |
| Maximum Impinger exit temperatures                                                                        | <68°F                                  | 46              | 53      | 58      |
| CPM filter exit temperature                                                                               | 65-85°F                                | 70              | 80      | 80      |
| Cyclonic flow angle                                                                                       | <20 degrees                            | 3.04            |         |         |

| Table 4-4. Method 5/Method 202 Quality Assurance Objectives and Results,<br>Pellet Cooler Stack S6, RCO 2 |                                        |                 |         |         |
|-----------------------------------------------------------------------------------------------------------|----------------------------------------|-----------------|---------|---------|
| Parameter                                                                                                 | Objectives                             | Test Run Values |         |         |
|                                                                                                           |                                        | Run 3           | Run 4   | Run 5   |
| Number of traverse points                                                                                 | Method 1 criteria, 24 points           | 24              | 24      | 24      |
| Sample volume                                                                                             | >30 DSCF                               | 44.807          | 45.544  | 43.969  |
| Isokinetic sampling rate                                                                                  | 90-110%                                | 102.5           | 102.5   | 102.8   |
| Post test sample train leak check                                                                         | <0.02 DSCF or 4% at maximum run vacuum | 0 @ 7           | 0 @ 12  | 0 @ 8   |
| Probe temperatures                                                                                        | 248±25°F                               | 255-262         | 250-258 | 254-260 |
| Filter temperatures                                                                                       | 248±25°F                               | 246-257         | 251-259 | 245-260 |
| Maximum Impinger exit temperatures                                                                        | <68°F                                  | 60              | 55      | 48      |
| CPM filter exit temperature                                                                               | 65-85°F                                | 75              | 77      | 75      |
| Cyclonic flow angle                                                                                       | <20 degrees                            | 2.71            |         |         |

**Method 202 Blanks**—The Method 202 blank sample data for each of the three test periods are summarized in Table 4-5.

| Table 4-5. Method 202 Blank Sample Analyses |               |               |               |
|---------------------------------------------|---------------|---------------|---------------|
| Sample                                      | Milligrams    |               |               |
|                                             | December 4-5  | January 16    | March 7       |
| Proof Blank                                 | 1.4           | 1.8           | 1.2           |
| Field Blank                                 | 1.9           | 2.0           | 1.1           |
| Acetone Reagent                             | 0.0 in 184 ml | 0.2 in 196 ml | 0.0 in 144 ml |
| Deionized Water                             | 0.0 in 200 ml | 0.6 in 200 ml | 0.0 in 146 ml |
| Hexane Reagent                              | 0.2 in 154 ml | 0.5 in 190 ml | 0.0 in 70 ml  |

All of the reagents used in the January 16, 2019 RCO 2 tests were slightly above the 1.0 ppm by weight value specified in Method 202. This was discussed with the laboratory. They indicated that these reagent blank values are in the same range as those in tests conducted by their other emission testing clients.

**S-Type Pitot Tube Calibration**—All S-Type Pitot tubes used in this project conformed to EPA guidelines concerning construction and geometry. Pitot tubes were inspected prior to use, and a Pitot tube coefficient of 0.84 was used.

**Sample Nozzle Calibration**—Glass nozzles were used for isokinetic sampling on the combined Method 5/Method 202 sampling trains. All nozzles were thoroughly cleaned, visually inspected, and calibrated according to the procedure outlined in Section 3.4.2 of EPA Publication No. 600/4-77-027b.

**Temperature Monitor** –The thermocouples used in this project was calibrated using the procedures described in Section 3.4.2 of EPA Publication No. 600/4-77-027b. Each temperature sensor was calibrated at a minimum of three points over the anticipated range of use against an NIST-traceable mercury in glass thermometer.

**Dry Gas Meter Calibration**—The dry gas meter was fully calibrated to determine the volume correction factor prior to field use. Post-test calibration checks were performed as soon as possible after the equipment has been returned to the shop. Pre-and post-test calibrations agreed within  $\pm 5$  percent. The calibration procedure is documented in Section 3.3.2 of EPA Publication No. 600/4-77-237b.

**Moisture Scale Calibration**—The scale used at the test location to determine flue gas moisture content was calibrated using a standard set of weights.

#### 4.2 Oxygen, Carbon Dioxide, Nitrogen Oxides, Volatile Organic Compound and Carbon Monoxide Tests, Methods 3A, 7E, 10, and 25A

**Dryer/RTO Stack S1**—Oxygen, carbon monoxide, nitrogen oxides, volatile organic compounds, and carbon monoxide were determined using EPA Methods 3A, 7E, 10, and 25A. These tests met all of the EPA quality assurance requirements for these methods. The quality assurance data are summarized in Tables 4-6 through 4-10 for the Dryer/RTO stack S1.

| Table 4-6. Quality Assurance Results – Dryer/RTO Stack S1. |           |             |       |       |
|------------------------------------------------------------|-----------|-------------|-------|-------|
| Oxygen                                                     |           |             |       |       |
| Linearity Tests                                            |           |             |       |       |
| Parameter                                                  | Allowable | Test Series |       |       |
| Zero, %                                                    | ±2        | 0.00        |       |       |
| Mid, %                                                     | ±2        | 0.00        |       |       |
| High, %                                                    | ±2        | 0.20        |       |       |
| System Tests                                               |           |             |       |       |
| Parameter                                                  | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                         | ±5        | 0.20        | 0.10  | 0.20  |
| Zero Bias (Post), %                                        | ±5        | 0.20        | 0.20  | 0.20  |
| Up-scale Bias (Pre), %                                     | ±5        | 0.00        | 0.10  | -0.10 |
| Up-scale Bias (Post), %                                    | ±5        | 0.10        | -0.10 | 0.20  |
| Zero Drift, %                                              | ±3        | 0.00        | 0.10  | 0.10  |
| Up-scale Drift, %                                          | ±3        | 0.10        | 0.20  | 0.20  |
| Response Time, sec                                         | N/A       | 35          |       |       |

| Table 4-7. Quality Assurance Results – Dryer/RTO Stack S1<br>Carbon Dioxide |           |             |       |       |
|-----------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                             |           |             |       |       |
| Parameter                                                                   | Allowable | Test Series |       |       |
| Zero, %                                                                     | ±2        | 0.50        |       |       |
| Mid, %                                                                      | ±2        | 0.30        |       |       |
| High, %                                                                     | ±2        | 0.20        |       |       |
| System Tests                                                                |           |             |       |       |
| Parameter                                                                   | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                          | ±5        | 0.00        | 0.00  | 0.00  |
| Zero Bias (Post), %                                                         | ±5        | 0.00        | 0.00  | 0.00  |
| Up-scale Bias (Pre), %                                                      | ±5        | -0.20       | 0.10  | 0.70  |
| Up-scale Bias (Post), %                                                     | ±5        | 0.10        | 0.70  | -0.20 |
| Zero Drift, %                                                               | ±3        | 0.00        | 0.00  | 0.00  |
| Up-scale Drift, %                                                           | ±3        | 0.40        | 0.50  | 0.90  |
| Response Time, sec                                                          | N/A       | 40          |       |       |

| Table 4-8. Quality Assurance Results – Dryer/RTO Stack 1<br>Nitrogen Oxides |           |             |       |       |
|-----------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                             |           |             |       |       |
| Parameter                                                                   | Allowable | Test Series |       |       |
| Zero, %                                                                     | ±2        | 0.20        |       |       |
| Mid Level, %                                                                | ±2        | -0.20       |       |       |
| High Level, %                                                               | ±2        | 0.00        |       |       |
| System Tests                                                                |           |             |       |       |
| Parameter                                                                   | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                          | ±5        | 0.10        | 0.30  | 0.40  |
| Zero Bias (Post), %                                                         | ±5        | 0.30        | 0.40  | 0.40  |
| Up-scale Bias (Pre), %                                                      | ±5        | -0.60       | -0.80 | -0.70 |
| Up-scale Bias (Post), %                                                     | ±5        | -0.80       | -0.70 | -3.20 |
| Zero Drift, %                                                               | ±3        | 0.2         | 0.20  | 0.00  |
| Up-scale Drift, %                                                           | ±3        | 0.2         | 0.10  | 2.40  |
| Response Time, sec                                                          | N/A       | 35          |       |       |

| Table 4-9. Quality Assurance Results – Dryer/RTO Stack S1<br>Carbon Monoxide |           |             |       |       |
|------------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                              |           |             |       |       |
| Parameter                                                                    | Allowable | Test Series |       |       |
| Zero, %                                                                      | ±2        | 0.10        |       |       |
| Mid, %                                                                       | ±2        | 0.50        |       |       |
| High, %                                                                      | ±2        | 0.00        |       |       |
| System Tests                                                                 |           |             |       |       |
| Parameter                                                                    | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                           | ±5        | 0.10        | 0.10  | 0.10  |
| Zero Bias (Post), %                                                          | ±5        | 0.10        | 0.10  | -0.10 |
| Up-scale Bias (Pre), %                                                       | ±5        | 0.10        | -0.20 | -0.20 |
| Up-scale Bias (Post), %                                                      | ±5        | -0.20       | -0.20 | -0.10 |
| Zero Drift, %                                                                | ±3        | 0.00        | 0.00  | 0.20  |
| Up-scale Drift, %                                                            | ±3        | 0.30        | 0.00  | 0.10  |
| Response Time, sec                                                           | N/A       | 35          |       |       |

| Table 4-10. Quality Assurance Results – Dryer/RTO Stack S1<br>VOCs |           |             |       |       |
|--------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                    |           |             |       |       |
| Parameter                                                          | Allowable | Test Series |       |       |
| Zero, %                                                            | ±5        | 0.10        |       |       |
| Low, %                                                             | ±5        | 0.80        |       |       |
| Mid, %                                                             | ±5        | -0.50       |       |       |
| High, %                                                            | ±5        | 0.00        |       |       |
| System Tests                                                       |           |             |       |       |
| Parameter                                                          | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                 | ±5        | 0.00        | 0.00  | 0.30  |
| Zero Bias (Post), %                                                | ±5        | 0.00        | 0.30  | 0.30  |
| Up-scale Bias (Pre), %                                             | ±5        | 0.00        | 0.20  | 0.10  |
| Up-scale Bias (Post), %                                            | ±5        | 0.20        | 0.10  | -0.10 |
| Zero Drift, %                                                      | ±3        | 0.00        | 0.20  | 0.00  |
| Up-scale Drift, %                                                  | ±3        | 0.20        | -0.10 | -0.10 |
| Response Time, sec                                                 | N/A       | 25          |       |       |



**Dry Hammermill Stack S3**—Oxygen, carbon dioxide and volatile organic compounds were determined using EPA Methods 3A and 25A. These tests met all of the EPA quality assurance requirements for these methods. The quality assurance data are summarized in Tables 4-11 through 4-13 for the Dry Hammermill stack S3.

| Table 4-11. Quality Assurance Results – Dry Hammermill Stack S3<br>Oxygen |           |             |       |       |
|---------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                           |           |             |       |       |
| Parameter                                                                 | Allowable | Test Series |       |       |
| Zero, %                                                                   | ±2        | 0.10        |       |       |
| Mid, %                                                                    | ±2        | 0.20        |       |       |
| High, %                                                                   | ±2        | 0.10        |       |       |
| System Tests                                                              |           |             |       |       |
| Parameter                                                                 | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                        | ±5        | 1.50        | 0.60  | 0.80  |
| Zero Bias (Post), %                                                       | ±5        | 0.60        | 0.80  | 1.00  |
| Up-scale Bias (Pre), %                                                    | ±5        | -0.50       | -0.20 | -0.10 |
| Up-scale Bias (Post), %                                                   | ±5        | -0.20       | -0.10 | -0.30 |
| Zero Drift, %                                                             | ±3        | 1.00        | 0.20  | 0.20  |
| Up-scale Drift, %                                                         | ±3        | 0.40        | 0.00  | 0.10  |
| Response Time, sec                                                        | N/A       | 30          |       |       |

| Table 4-12. Quality Assurance Results – Dry Hammermill Stack S3<br>Carbon Dioxide |           |             |       |       |
|-----------------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                                   |           |             |       |       |
| Parameter                                                                         | Allowable | Test Series |       |       |
| Zero, %                                                                           | ±2        | 0.70        |       |       |
| Mid, %                                                                            | ±2        | 0.30        |       |       |
| High, %                                                                           | ±2        | 0.10        |       |       |
| System Tests                                                                      |           |             |       |       |
| Parameter                                                                         | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                                | ±5        | -0.10       | 0.00  | 0.00  |
| Zero Bias (Post), %                                                               | ±5        | 0.00        | 0.00  | 0.20  |
| Up-scale Bias (Pre), %                                                            | ±5        | -0.30       | 0.20  | 0.20  |
| Up-scale Bias (Post), %                                                           | ±5        | 0.20        | 0.20  | -0.10 |
| Zero Drift, %                                                                     | ±3        | 0.10        | 0.00  | 0.20  |
| Up-scale Drift, %                                                                 | ±3        | 0.30        | 0.00  | 0.20  |
| Response Time, sec                                                                | N/A       | 35          |       |       |

| Table 4-13. Quality Assurance Results – Dry Hammermill Stack S3<br>VOCs |           |             |       |       |
|-------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                         |           |             |       |       |
| Parameter                                                               | Allowable | Test Series |       |       |
| Zero, %                                                                 | ±5        | 0.10        |       |       |
| Low, %                                                                  | ±5        | 0.10        |       |       |
| Mid, %                                                                  | ±5        | 0.00        |       |       |
| High, %                                                                 | ±5        | -0.20       |       |       |
| System Tests                                                            |           |             |       |       |
| Parameter                                                               | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                      | ±5        | 0.00        | -0.10 | 0.00  |
| Zero Bias (Post), %                                                     | ±5        | -0.20       | 0.00  | 0.20  |
| Up-scale Bias (Pre), %                                                  | ±5        | 0.00        | -0.60 | -0.50 |
| Up-scale Bias (Post), %                                                 | ±5        | -0.60       | -0.50 | -0.10 |
| Zero Drift, %                                                           | ±3        | -0.20       | 0.10  | 0.20  |
| Up-scale Drift, %                                                       | ±3        | -0.60       | 0.10  | 0.40  |
| Response Time, sec                                                      | N/A       | 30          |       |       |

**Pellet Cooler RCO 1 Stack S5**—Oxygen, carbon monoxide, nitrogen oxides, volatile organic compounds, and carbon monoxide were determined using EPA Methods 3A, 7E, 10, and 25A. These tests met all of the EPA quality assurance requirements for these methods. The quality assurance data are summarized in Tables 4-14 through 4-18 for the Pellet Cooler Stack S5.

| Table 4-14. Quality Assurance Results – Pellet Cooler RCO 1 Stack S5 Oxygen |           |             |       |       |
|-----------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                             |           |             |       |       |
| Parameter                                                                   | Allowable | Test Series |       |       |
| Zero, %                                                                     | ±2        | -0.1        |       |       |
| Mid, %                                                                      | ±2        | -0.2        |       |       |
| High, %                                                                     | ±2        | 0.2         |       |       |
| System Tests                                                                |           |             |       |       |
| Parameter                                                                   | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                          | ±5        | 0.1         | 0.3   | 0.6   |
| Zero Bias (Post), %                                                         | ±5        | 0.3         | 0.6   | 0.2   |
| Up-scale Bias (Pre), %                                                      | ±5        | -0.3        | -0.1  | -0.4  |
| Up-scale Bias (Post), %                                                     | ±5        | -0.1        | -0.4  | 0.1   |
| Zero Drift, %                                                               | ±3        | 0.2         | 0.3   | 0.5   |
| Up-scale Drift, %                                                           | ±3        | 0.3         | 0.3   | 0.5   |
| Response Time, sec                                                          | N/A       | 35          |       |       |

| Table 4-15. Quality Assurance Results –Pellet Cooler RCO 1 Stack S5<br>Carbon Dioxide |           |             |       |       |
|---------------------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                                       |           |             |       |       |
| Parameter                                                                             | Allowable | Test Series |       |       |
| Zero, %                                                                               | ±2        | 0           |       |       |
| Mid, %                                                                                | ±2        | 0.6         |       |       |
| High, %                                                                               | ±2        | 0           |       |       |
| System Tests                                                                          |           |             |       |       |
| Parameter                                                                             | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                                    | ±5        | 0.0         | 0.0   | 0.0   |
| Zero Bias (Post), %                                                                   | ±5        | 0.0         | 0.0   | 0.0   |
| Up-scale Bias (Pre), %                                                                | ±5        | -1.7        | -1.6  | -2.3  |
| Up-scale Bias (Post), %                                                               | ±5        | -0.7        | -2.3  | -1.0  |
| Zero Drift, %                                                                         | ±3        | 0.0         | 0.0   | 0.0   |
| Up-scale Drift, %                                                                     | ±3        | 0.9         | 1.6   | 1.3   |
| Response Time, sec                                                                    | N/A       | 40          |       |       |

| Table 4-16. Quality Assurance Results – Pellet Cooler RCO 1 Stack S5 VOCs |           |             |       |       |
|---------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                           |           |             |       |       |
| Parameter                                                                 | Allowable | Test Series |       |       |
| Zero, %                                                                   | ±5        | 0.1         |       |       |
| Low, %                                                                    | ±5        | 2.1         |       |       |
| Mid, %                                                                    | ±5        | -0.7        |       |       |
| High, %                                                                   | ±5        | -0.1        |       |       |
| System Tests                                                              |           |             |       |       |
| Parameter                                                                 | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                        | ±5        | -0.4        | -0.7  | -0.3  |
| Zero Bias (Post), %                                                       | ±5        | -0.7        | -0.3  | -0.6  |
| Up-scale Bias (Pre), %                                                    | ±5        | 0.1         | 0.3   | 0.8   |
| Up-scale Bias (Post), %                                                   | ±5        | 0.3         | 0.8   | -0.8  |
| Zero Drift, %                                                             | ±3        | -0.3        | 0.4   | -0.3  |
| Up-scale Drift, %                                                         | ±3        | 0.1         | 0.5   | -1.5  |
| Response Time, sec                                                        | N/A       | 30          |       |       |

| Table 4-17. Quality Assurance Results – Pellet Cooler RCO 1 Stack S5<br>Nitrogen Oxides |           |             |       |       |
|-----------------------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                                         |           |             |       |       |
| Parameter                                                                               | Allowable | Test Series |       |       |
| Zero, %                                                                                 | ±2        | 0.1         |       |       |
| Mid Level, %                                                                            | ±2        | -0.3        |       |       |
| High Level, %                                                                           | ±2        | 0           |       |       |
| System Tests                                                                            |           |             |       |       |
| Parameter                                                                               | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                                      | ±5        | -0.1        | -0.5  | 0.0   |
| Zero Bias (Post), %                                                                     | ±5        | -0.5        | 0.0   | -0.2  |
| Up-scale Bias (Pre), %                                                                  | ±5        | 0.2         | -1.9  | -0.6  |
| Up-scale Bias (Post), %                                                                 | ±5        | -1.9        | -0.6  | -0.4  |
| Zero Drift, %                                                                           | ±3        | 0.4         | 0.5   | 0.1   |
| Up-scale Drift, %                                                                       | ±3        | 2.1         | 1.3   | 0.2   |
| Response Time, sec                                                                      | N/A       | 35          |       |       |

| Table 4-18 Quality Assurance Results – Pellet Cooler RCO 1 Stack S5<br>Carbon Monoxide |           |             |       |       |
|----------------------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                                        |           |             |       |       |
| Parameter                                                                              | Allowable | Test Series |       |       |
| Zero, %                                                                                | ±2        | 0           |       |       |
| Mid, %                                                                                 | ±2        | -0.6        |       |       |
| High, %                                                                                | ±2        | 0           |       |       |
| System Tests                                                                           |           |             |       |       |
| Parameter                                                                              | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                                     | ±5        | 0.0         | 1.0   | 0.6   |
| Zero Bias (Post), %                                                                    | ±5        | 1.0         | 0.6   | 0.4   |
| Up-scale Bias (Pre), %                                                                 | ±5        | 2.5         | 1.8   | 2.6   |
| Up-scale Bias (Post), %                                                                | ±5        | 1.8         | 2.6   | 1.9   |
| Zero Drift, %                                                                          | ±3        | 1.0         | 0.4   | 0.1   |
| Up-scale Drift, %                                                                      | ±3        | 1.6         | 0.8   | 0.7   |
| Response Time, sec                                                                     | N/A       | 30          |       |       |

**Pellet Cooler RCO 2 Stack S6**—Oxygen, carbon monoxide, nitrogen oxides, volatile organic compounds, and carbon monoxide were determined using EPA Methods 3A, 7E, 10, and 25A. These tests met all of the EPA quality assurance requirements for these methods. The quality assurance data are summarized in Tables 4-19 through 4-23 for the Pellet Cooler stack S6.

| Table 4-19 Quality Assurance Results – Pellet Cooler RCO 2 Stack S6 Oxygen |           |             |       |       |
|----------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                            |           |             |       |       |
| Parameter                                                                  | Allowable | Test Series |       |       |
| Zero, %                                                                    | ±2        | 0.0         |       |       |
| Mid, %                                                                     | ±2        | 0.1         |       |       |
| High, %                                                                    | ±2        | 0.2         |       |       |
| System Tests                                                               |           |             |       |       |
| Parameter                                                                  | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                         | ±5        | 0.1         | 0.0   | 0.0   |
| Zero Bias (Post), %                                                        | ±5        | 0.0         | 0.0   | 0.0   |
| Up-scale Bias (Pre), %                                                     | ±5        | -0.1        | -0.3  | -0.7  |
| Up-scale Bias (Post), %                                                    | ±5        | -0.3        | -0.7  | -0.2  |
| Zero Drift, %                                                              | ±3        | 0.0         | 0.0   | 0.1   |
| Up-scale Drift, %                                                          | ±3        | 0.1         | 0.4   | 0.5   |
| Response Time, sec                                                         | N/A       | 35          |       |       |

| Table 4-20. Quality Assurance Results –Pellet Cooler RCO 2 Stack S6<br>Carbon Dioxide |           |             |       |       |
|---------------------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                                       |           |             |       |       |
| Parameter                                                                             | Allowable | Test Series |       |       |
| Zero, %                                                                               | ±2        | -0.3        |       |       |
| Mid, %                                                                                | ±2        | 0.2         |       |       |
| High, %                                                                               | ±2        | -0.1        |       |       |
| System Tests                                                                          |           |             |       |       |
| Parameter                                                                             | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                                    | ±5        | 0.4         | 0.1   | -0.5  |
| Zero Bias (Post), %                                                                   | ±5        | 0.1         | -0.5  | 1.1   |
| Up-scale Bias (Pre), %                                                                | ±5        | -0.3        | -0.1  | -0.2  |
| Up-scale Bias (Post), %                                                               | ±5        | -0.1        | -0.2  | 0.0   |
| Zero Drift, %                                                                         | ±3        | 0.3         | 0.6   | 1.6   |
| Up-scale Drift, %                                                                     | ±3        | 0.2         | 0.1   | 0.2   |
| Response Time, sec                                                                    | N/A       | 30          |       |       |

| Table 4-21. Quality Assurance Results – Pellet Cooler RCO 2 Stack S6 VOCs |           |             |       |       |
|---------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                           |           |             |       |       |
| Parameter                                                                 | Allowable | Test Series |       |       |
| Zero, %                                                                   | ±5        | 0.1         |       |       |
| Low, %                                                                    | ±5        | 3.4         |       |       |
| Mid, %                                                                    | ±5        | -0.1        |       |       |
| High, %                                                                   | ±5        | 0.0         |       |       |
| System Tests                                                              |           |             |       |       |
| Parameter                                                                 | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                        | ±5        | -0.4        | -0.3  | 0.2   |
| Zero Bias (Post), %                                                       | ±5        | -0.3        | 0.2   | 0.1   |
| Up-scale Bias (Pre), %                                                    | ±5        | -0.1        | -0.5  | -0.2  |
| Up-scale Bias (Post), %                                                   | ±5        | -0.5        | -0.2  | 0.1   |
| Zero Drift, %                                                             | ±3        | 0.2         | 0.4   | -0.1  |
| Up-scale Drift, %                                                         | ±3        | -0.5        | 0.4   | 0.3   |
| Response Time, sec                                                        | N/A       | 25          |       |       |

| Table 4-22. Quality Assurance Results – Pellet Cooler RCO 2 Stack S6 Nitrogen Oxides |           |             |       |       |
|--------------------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                                      |           |             |       |       |
| Parameter                                                                            | Allowable | Test Series |       |       |
| Zero, %                                                                              | ±2        | 0.0         |       |       |
| Mid Level, %                                                                         | ±2        | 0.0         |       |       |
| High Level, %                                                                        | ±2        | 0.1         |       |       |
| System Tests                                                                         |           |             |       |       |
| Parameter                                                                            | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                                   | ±5        | 0.4         | 0.3   | 0.1   |
| Zero Bias (Post), %                                                                  | ±5        | 0.3         | 0.1   | 0.0   |
| Up-scale Bias (Pre), %                                                               | ±5        | -0.2        | -0.3  | -0.6  |
| Up-scale Bias (Post), %                                                              | ±5        | -0.3        | -0.6  | -0.1  |
| Zero Drift, %                                                                        | ±3        | 0.2         | 0.2   | 0.1   |
| Up-scale Drift, %                                                                    | ±3        | 0.0         | 0.3   | 0.4   |
| Response Time, sec                                                                   | N/A       | 30          |       |       |

| Table 4-23. Quality Assurance Results – Pellet Cooler RCO 2 Stack S6<br>Carbon Monoxide |           |             |       |       |
|-----------------------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                                         |           |             |       |       |
| Parameter                                                                               | Allowable | Test Series |       |       |
| Zero, %                                                                                 | ±2        | 0.0         |       |       |
| Mid, %                                                                                  | ±2        | 0.9         |       |       |
| High, %                                                                                 | ±2        | 0.2         |       |       |
| System Tests                                                                            |           |             |       |       |
| Parameter                                                                               | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                                      | ±5        | 0.3         | 0.2   | 0.4   |
| Zero Bias (Post), %                                                                     | ±5        | 0.2         | 0.4   | 0.1   |
| Up-scale Bias (Pre), %                                                                  | ±5        | -0.4        | -0.5  | -0.5  |
| Up-scale Bias (Post), %                                                                 | ±5        | -0.5        | -0.5  | 0.2   |
| Zero Drift, %                                                                           | ±3        | 0.1         | 0.2   | 0.3   |
| Up-scale Drift, %                                                                       | ±3        | 0.2         | 0.0   | 0.7   |
| Response Time, sec                                                                      | N/A       | 35          |       |       |

### 4.3 HAPs Tests, Method 320 and Method 321

Air Control Techniques, P.C. performed daily quality assurance checks. Background scans and calibration transfer standard (CTS) spectra tests were performed prior to and following each test series. An analyte spike was performed using a methanol/SF<sub>6</sub> calibration standard.

The flow rate at the outlet of the pump was measured while the probe was plugged to verify that the sampling system was leak free. The flow rate was less than 200 ml/min. The FTIR cell was tested for leaks by closing the value while the cell was at minimum absolute pressure. The cell pressure remained constant for at least two minutes.

**Background Spectra**—Sample spectra were divided point-by-point by a 128-scan background recorded using nitrogen. The single beam spectrum was constantly monitored, and a new background was generated at the beginning and end of each test day or when residual and absorbance spectra indicated component build-up on the optical surfaces or alignment-related baseline shifts.

**Calibration Transfer Standards and Absorption Path Lengths**—A cylinder of 99.79 ppm ethylene in nitrogen served as the CTS. A CTS gas was introduced to the FTIR and allowed to reach steady state. The CTS was used to determine the effective cell path length based on comparisons of the “field” CTS spectra to a laboratory CTS spectrum recorded by MIDAC. As shown in Table 4-24, the maximum path length deviation was less than 5% of the average during the test program.



| Table 4-24. CTS Results Summary |         |      |         |                     |                |                         |                        |
|---------------------------------|---------|------|---------|---------------------|----------------|-------------------------|------------------------|
| Source                          | Date    | Time | CTS (m) | Cell Pressure (psi) | Cell Temp (°C) | Deviation from Previous | Deviation from Average |
| Dry Hammermill                  | 12/4/18 | 0736 | 8.19    | 14.42               | 181            | NA                      | 0.1%                   |
|                                 | 12/4/18 | 1459 | 8.20    | 14.37               | 181            | -0.1%                   | -0.1%                  |
| Dryer/RTO                       | 12/5/18 | 736  | 8.034   | 14.490              | 181            | NA                      | 0.1%                   |
|                                 | 12/5/18 | 1403 | 8.055   | 14.43               | 181            | -0.3%                   | -0.1%                  |
| Pellet Cooler RCO 1             | 3/7/19  | 748  | 8.12    | 14.86               | 181            | NA                      | 0.0                    |
| Pellet Cooler RCO 2             | 1/15/19 | 730  | 7.98    | 14.70               | 181            | NA                      | 0.0                    |

**Minimum Detectable Concentration**—EPA Method 320 and the equivalent ASTM Standard D6348-03 specify a number of analytical uncertainty parameters that the analyst may calculate to characterize the FTIR system performance. Emissions were calculated using the detection limit for this run. The MDL were calculated as follows.

$$\text{MDL (ppm)} = \text{SEC} \times 2$$

Analytes with a SEC value that is twice the measured concentration are classified as a non-detectable concentration, and the reported value is 0.0. The MDL values for each test are listed in Appendix C of each of the three appendices.

**QA Review**—An analysis of possible analytical interferents (e.g., H<sub>2</sub>O, CO<sub>2</sub>, CO, pinenes) for this gas stream was determined prior to the test program. Reference spectra of the possible interferents were entered into the modeling program to minimize analytical uncertainty and detection limits of the target compounds.

Water spectra were recorded onsite with the FTIR instruments that were used for the field testing to simulate the actual gas stream moisture. The recorded water spectra were included as the primary spectra for modeling.

**APPENDIX I-A**  
**Method 5-Method 202 Data Sheets**

Date 12/3/2018

|                   |                   |  |
|-------------------|-------------------|--|
| Client            | Enviva            |  |
| Job #             | 2333              |  |
| Plant Name        | Enviva, Greenwood |  |
| City, State       | Greenwood, SC     |  |
| Sampling Location | RTO Dryer         |  |

|                                                   |        |
|---------------------------------------------------|--------|
| No. of Ports Available                            | 4      |
| No. of Ports Used                                 | 4      |
| Port Inside Diameter, Inches                      | 4      |
| Distance From Far Wall To Outside Of Port, Inches | 106    |
| Nipple Length And/Or Wall Thickness, Inches       | 6      |
| Depth Of Stack Or Duct, Inches                    | 100    |
| Stack Or Duct Width (if rectangular), Inches      |        |
| Equiv. Diameter = $2DW/(D+W)$ , Inches            |        |
| Stack/Duct Area, Square Feet                      | 54.542 |

$$(\pi R^2 \text{ or } L \times W)$$
  

|                                     | Upstream | Downstream |
|-------------------------------------|----------|------------|
| Distance to Flow Disturbances, feet | 30       | 20         |
| Diameters                           | 3.6      | 2.4        |

[illegible]

|                       |                       |
|-----------------------|-----------------------|
| 0.0000 - 0.0625 - 0   | 0.5625 - 0.6875 - 5/8 |
| 0.0625 - 0.1875 - 1/8 | 0.6875 - 0.8125 - 3/4 |
| 0.1875 - 0.3125 - 1/4 | 0.8125 - 0.9375 - 7/8 |
| 0.3125 - 0.4375 - 3/8 | 0.9375 - 1.0000 - 1   |
| 0.4375 - 0.5625 - 1/2 |                       |

| Diameters |       |       |             |
|-----------|-------|-------|-------------|
| Velocity  | Up    | Down  | Particulate |
| 12        | >7.00 | >1.75 | 12          |
| 12        | 6     | 1.5   | 16          |
| 16        | 5     | 1.25  | 20          |
| 16        | 2     | 0.5   | 24 or 25    |

Note: If more than 8 and 2 diameters and duct is greater than 12" and less than 24", use 8 or 9 points.

| Location of Points in Circular Stacks or Ducts |      |      |      |      |      |      |      |      |      |      |      |
|------------------------------------------------|------|------|------|------|------|------|------|------|------|------|------|
|                                                | 4    | 6    | 8    | 10   | 12   | 14   | 16   | 18   | 20   | 22   | 24   |
| 1                                              | 6.7  | 4.4  | 3.2  | 2.6  | 2.1  | 1.8  | 1.6  | 1.4  | 1.3  | 1.1  | 1.1  |
| 2                                              | 25.0 | 14.6 | 10.5 | 8.2  | 6.7  | 5.7  | 4.9  | 4.4  | 3.9  | 3.5  | 3.2  |
| 3                                              | 75.0 | 29.6 | 19.4 | 14.6 | 11.8 | 9.9  | 8.5  | 7.5  | 6.7  | 6.0  | 5.5  |
| 4                                              | 93.3 | 70.4 | 32.3 | 22.6 | 17.7 | 14.6 | 12.5 | 10.9 | 9.7  | 8.7  | 7.9  |
| 5                                              |      | 85.4 | 67.7 | 34.2 | 25.0 | 20.1 | 16.9 | 14.6 | 12.9 | 1106 | 10.5 |
| 6                                              |      | 95.6 | 80.6 | 65.8 | 35.6 | 26.9 | 22.0 | 18.8 | 16.5 | 14.6 | 13.2 |
| 7                                              |      |      | 89.5 | 77.4 | 64.4 | 36.6 | 28.3 | 23.6 | 20.4 | 18.0 | 16.1 |
| 8                                              |      |      | 96.8 | 85.4 | 75.0 | 63.4 | 37.5 | 29.6 | 25.0 | 21.8 | 19.4 |
| 9                                              |      |      |      | 91.8 | 82.3 | 73.1 | 62.5 | 38.2 | 30.6 | 26.2 | 23   |
| 10                                             |      |      |      | 97.4 | 88.2 | 79.9 | 71.7 | 61.8 | 38.8 | 31.5 | 27.2 |
| 11                                             |      |      |      |      | 93.3 | 85.4 | 78.0 | 70.4 | 61.2 | 39.3 | 32.3 |
| 12                                             |      |      |      |      | 97.9 | 90.1 | 83.1 | 76.4 | 69.4 | 60.7 | 39.8 |
| 13                                             |      |      |      |      |      | 94.3 | 87.5 | 81.2 | 75   | 68.5 | 60.2 |
| 14                                             |      |      |      |      |      | 98.2 | 91.5 | 85.4 | 79.6 | 73.8 | 67.7 |
| 15                                             |      |      |      |      |      |      | 95.1 | 89.1 | 83.5 | 78.2 | 72.8 |
| 16                                             |      |      |      |      |      |      | 98.4 | 92.5 | 87.1 | 82.0 | 77   |
| 17                                             |      |      |      |      |      |      |      | 95.6 | 90.3 | 85.4 | 80.6 |
| 18                                             |      |      |      |      |      |      |      | 98.6 | 93.3 | 88.4 | 83.9 |
| 19                                             |      |      |      |      |      |      |      |      | 96.1 | 91.3 | 86.8 |
| 20                                             |      |      |      |      |      |      |      |      | 98.7 | 94.0 | 89.5 |
| 21                                             |      |      |      |      |      |      |      |      |      | 96.5 | 92.1 |
| 22                                             |      |      |      |      |      |      |      |      |      | 98.9 | 94.5 |
| 23                                             |      |      |      |      |      |      |      |      |      |      | 96.8 |
| 24                                             |      |      |      |      |      |      |      |      |      |      | 99.9 |

[illegible]

| PRELIMINARY INFORMATION      |                        |                                            |                              |            |            |        |
|------------------------------|------------------------|--------------------------------------------|------------------------------|------------|------------|--------|
| Plant Name                   | Enviva, Greenwood      |                                            | Date                         | 11/28/2018 |            |        |
| City, State                  | Greenwood, SC          |                                            | Project #                    | 2333       |            |        |
| Personnel                    | TH, JG, EG             |                                            | Pitot Identification         | 6H         |            |        |
| Test Location                | Dryer                  |                                            | Pitot Coefficient (Cp)       | 0.84       |            |        |
| Stack Dimensions             |                        |                                            | Pressures                    |            |            |        |
| Length of Stack (D)          | 100                    | in                                         | Barometric Pressure (Pb)     | 29.9       | in Hg      |        |
| Width of Stack (W)           |                        | in                                         | Static Pressure (Pg)         | -0.385     | in H2O     |        |
| Area of Stack (As)           | 54.542                 | ft²                                        | Absolute Stack Pressure (Ps) | 29.87      | in Hg      |        |
| Stack Gas Composition        |                        |                                            |                              |            |            |        |
| Carbon Dioxide (%CO2)        | 7.0                    |                                            | Moisture Content (Bws)       | 35.00      | %          |        |
| Oxygen (%O2)                 | 14.0                   |                                            | Dry Molecular Weight (Md)    | 29.68      | lb/lb-mole |        |
| Nitrogen Concentration (%N2) | 79.0                   |                                            | Wet Molecular Weight (Ms)    | 25.59      | lb/lb-mole |        |
| Start                        | Preliminary Traverse   |                                            |                              |            |            |        |
|                              | Pitot Tube Leak Checks |                                            |                              | A          | B          |        |
|                              | Port                   | Point                                      | Angle, °                     | Δp, in H2O | Temp. °F   | ft/sec |
|                              | A                      | 1                                          | 1                            | 0.58       | 261        | 52.88  |
|                              |                        | 2                                          | 0                            | 0.57       | 269        | 52.94  |
|                              |                        | 3                                          | 0                            | 0.60       | 254        | 53.76  |
|                              |                        | 4                                          | 3                            | 0.40       | 244        | 43.58  |
|                              |                        | 5                                          | 0                            | 0.51       | 252        | 49.49  |
|                              |                        | 6                                          | 0                            | 0.83       | 268        | 63.84  |
|                              | B                      | 1                                          | 0                            | 0.55       | 260        | 51.68  |
|                              |                        | 2                                          | 0                            | 0.66       | 260        | 56.45  |
|                              |                        | 3                                          | 1                            | 1.15       | 260        | 74.74  |
|                              |                        | 4                                          | 3                            | 0.66       | 260        | 56.45  |
|                              |                        | 5                                          | 2                            | 0.43       | 260        | 45.70  |
|                              |                        | 6                                          | 0                            | 0.32       | 260        | 39.42  |
|                              |                        |                                            |                              |            |            |        |
|                              |                        |                                            |                              |            |            |        |
|                              |                        |                                            |                              |            |            |        |
|                              |                        |                                            |                              |            |            |        |
|                              |                        |                                            |                              |            |            |        |
|                              |                        |                                            |                              |            |            |        |
|                              |                        |                                            |                              |            |            |        |
|                              |                        |                                            |                              |            |            |        |
|                              |                        |                                            |                              |            |            |        |
|                              |                        |                                            |                              |            |            |        |
| End                          |                        |                                            |                              |            |            |        |
|                              |                        |                                            |                              |            |            |        |
|                              |                        |                                            |                              |            |            |        |
|                              |                        |                                            |                              |            |            |        |
| Average Angle, Degrees       |                        | 0.83                                       |                              |            |            |        |
| Average Velocity Pressure    |                        |                                            | 0.5879                       |            |            |        |
|                              |                        |                                            |                              | 259.0      |            |        |
|                              |                        | Average Stack Gas Velocity (ft/sec)        |                              |            | 53.40      |        |
|                              |                        | Actual Cubic Feet per minute (ACFM)        |                              |            | 174,743    |        |
|                              |                        | Dry Standard Cubic Feet per Minute (DSCFM) |                              |            | 83,276     |        |

**Air Control Techniques, P.C.**  
**Isokinetic Sampling Train Field Data Sheet**

|              |               |                 |
|--------------|---------------|-----------------|
| <b>Job #</b> | <b>Run ID</b> | <b>M5/202-1</b> |
| 2333         | Method        | 5/202           |

| IDENTIFICATION INFORMATION            |                   |             |                   | PRELIMINARY CHECKS AND DATA                                                                                                                                                                                                                                                                                                                                                           |  |  |  |        |       |                      |                      |      |                       |   |                       |                     |       |                                       |       |                             |       |
|---------------------------------------|-------------------|-------------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--------|-------|----------------------|----------------------|------|-----------------------|---|-----------------------|---------------------|-------|---------------------------------------|-------|-----------------------------|-------|
| Plant                                 | Enviva, Greenwood |             |                   | <table border="1"> <tr> <td>Actual</td> <td>Req'd</td> <td>Vacuum</td> </tr> <tr> <td>Pre Leak Check, ACFM</td> <td>0.00</td> <td>&lt;0.02 or 4%</td> <td>8</td> </tr> <tr> <td>Post Leak Check, ACFM</td> <td>0.00</td> <td>0.020</td> <td>9</td> </tr> </table>                                                                                                                     |  |  |  | Actual | Req'd | Vacuum               | Pre Leak Check, ACFM | 0.00 | <0.02 or 4%           | 8 | Post Leak Check, ACFM | 0.00                | 0.020 | 9                                     |       |                             |       |
| Actual                                | Req'd             | Vacuum      |                   |                                                                                                                                                                                                                                                                                                                                                                                       |  |  |  |        |       |                      |                      |      |                       |   |                       |                     |       |                                       |       |                             |       |
| Pre Leak Check, ACFM                  | 0.00              | <0.02 or 4% | 8                 |                                                                                                                                                                                                                                                                                                                                                                                       |  |  |  |        |       |                      |                      |      |                       |   |                       |                     |       |                                       |       |                             |       |
| Post Leak Check, ACFM                 | 0.00              | 0.020       | 9                 |                                                                                                                                                                                                                                                                                                                                                                                       |  |  |  |        |       |                      |                      |      |                       |   |                       |                     |       |                                       |       |                             |       |
| City, State                           | Greenwood, SC     |             |                   |                                                                                                                                                                                                                                                                                                                                                                                       |  |  |  |        |       |                      |                      |      |                       |   |                       |                     |       |                                       |       |                             |       |
| Test Location                         | Dryer             |             |                   |                                                                                                                                                                                                                                                                                                                                                                                       |  |  |  |        |       |                      |                      |      |                       |   |                       |                     |       |                                       |       |                             |       |
| Date                                  | 12/5/18           |             | Filter ID 1       | <table border="1"> <tr> <td>A</td> <td>B</td> </tr> <tr> <td>Pitot Pre Leak Check</td> <td>5</td> <td>6</td> </tr> <tr> <td>Pitot Post Leak Check</td> <td>4</td> <td>4</td> </tr> <tr> <td>Ambient Temperature</td> <td>33</td> </tr> <tr> <td>Static Pressure, In. H<sub>2</sub>O</td> <td>-0.39</td> </tr> <tr> <td>Barometric Pressure, In. Hg</td> <td>29.97</td> </tr> </table> |  |  |  | A      | B     | Pitot Pre Leak Check | 5                    | 6    | Pitot Post Leak Check | 4 | 4                     | Ambient Temperature | 33    | Static Pressure, In. H <sub>2</sub> O | -0.39 | Barometric Pressure, In. Hg | 29.97 |
| A                                     | B                 |             |                   |                                                                                                                                                                                                                                                                                                                                                                                       |  |  |  |        |       |                      |                      |      |                       |   |                       |                     |       |                                       |       |                             |       |
| Pitot Pre Leak Check                  | 5                 | 6           |                   |                                                                                                                                                                                                                                                                                                                                                                                       |  |  |  |        |       |                      |                      |      |                       |   |                       |                     |       |                                       |       |                             |       |
| Pitot Post Leak Check                 | 4                 | 4           |                   |                                                                                                                                                                                                                                                                                                                                                                                       |  |  |  |        |       |                      |                      |      |                       |   |                       |                     |       |                                       |       |                             |       |
| Ambient Temperature                   | 33                |             |                   |                                                                                                                                                                                                                                                                                                                                                                                       |  |  |  |        |       |                      |                      |      |                       |   |                       |                     |       |                                       |       |                             |       |
| Static Pressure, In. H <sub>2</sub> O | -0.39             |             |                   |                                                                                                                                                                                                                                                                                                                                                                                       |  |  |  |        |       |                      |                      |      |                       |   |                       |                     |       |                                       |       |                             |       |
| Barometric Pressure, In. Hg           | 29.97             |             |                   |                                                                                                                                                                                                                                                                                                                                                                                       |  |  |  |        |       |                      |                      |      |                       |   |                       |                     |       |                                       |       |                             |       |
| Start                                 | 8:40              |             | Filter ID 2       |                                                                                                                                                                                                                                                                                                                                                                                       |  |  |  |        |       |                      |                      |      |                       |   |                       |                     |       |                                       |       |                             |       |
| Stop                                  | 9:47              |             | Filter ID 3       |                                                                                                                                                                                                                                                                                                                                                                                       |  |  |  |        |       |                      |                      |      |                       |   |                       |                     |       |                                       |       |                             |       |
| Meterbox ID                           | 909033            | TH, JG, EC  | Operator*         |                                                                                                                                                                                                                                                                                                                                                                                       |  |  |  |        |       |                      |                      |      |                       |   |                       |                     |       |                                       |       |                             |       |
| ΔH <sub>g</sub>                       | 1.898             |             | Stack TC ID       |                                                                                                                                                                                                                                                                                                                                                                                       |  |  |  |        |       |                      |                      |      |                       |   |                       |                     |       |                                       |       |                             |       |
| Gamma (Y)                             | 0.9744            |             | Tedlar Bags       |                                                                                                                                                                                                                                                                                                                                                                                       |  |  |  |        |       |                      |                      |      |                       |   |                       |                     |       |                                       |       |                             |       |
| Ideal Nozzle                          | 0.299             |             | Orsat Pump        |                                                                                                                                                                                                                                                                                                                                                                                       |  |  |  |        |       |                      |                      |      |                       |   |                       |                     |       |                                       |       |                             |       |
| Nozzle Dia.                           | 0.302             |             | Probe Length/Type |                                                                                                                                                                                                                                                                                                                                                                                       |  |  |  |        |       |                      |                      |      |                       |   |                       |                     |       |                                       |       |                             |       |
| Nozzle ID                             | M22               | 3.16        | K Factor          |                                                                                                                                                                                                                                                                                                                                                                                       |  |  |  |        |       |                      |                      |      |                       |   |                       |                     |       |                                       |       |                             |       |
| Probe ID                              | 4A                |             | Umbilic ID        |                                                                                                                                                                                                                                                                                                                                                                                       |  |  |  |        |       |                      |                      |      |                       |   |                       |                     |       |                                       |       |                             |       |

**ACTUAL MOISTURE & GAS COMPOSITION**

|                        |       |                  |       |
|------------------------|-------|------------------|-------|
| Water Recovered, grams | 602.6 | Moisture, %      | 39.49 |
| CO <sub>2</sub> %      | 7.89  | O <sub>2</sub> % | 12.53 |

**Sampling Information**

| Point | Time Per Pt. (Min.) | Elapsed Time (h:m:s) | Dry Gas Meter (cu.ft.) | Velocity ΔP (In H <sub>2</sub> O) | Meter Temp (°F) | Stack Temp (°F) | Actual ΔH (in H <sub>2</sub> O) | Probe Temp (°F) | Filter Temp (°F) | Exit Temp (°F) | CPM Temp (°F) | Pump Vac (in. Hg) | Target ΔH (in H <sub>2</sub> O) | Run ISO % Pt | Run ISO % Cum | Lk √ During Run |
|-------|---------------------|----------------------|------------------------|-----------------------------------|-----------------|-----------------|---------------------------------|-----------------|------------------|----------------|---------------|-------------------|---------------------------------|--------------|---------------|-----------------|
| 1     | 2.5                 | 0                    | 314.658                | 0.45                              | 43              | 260             | 1.5                             | 260             | 258              | 41             | 70            | 4                 | 1.452                           | 104.7        | 104.7         | LC 1            |
| 2     | 2.5                 | 2:30                 | 316.35                 | 0.59                              | 43              | 249             | 1.9                             | 251             | 254              | 37             | 71            | 5                 | 1.933                           | 91.8         | 97.8          |                 |
| 3     | 2.5                 | 5:0                  | 318.06                 | 0.55                              | 44              | 253             | 1.8                             | 258             | 257              | 37             | 71            | 5                 | 1.793                           | 100.7        | 98.8          |                 |
| 4     | 2.5                 | 7:30                 | 319.87                 | 0.4                               | 45              | 244             | 1.3                             | 253             | 254              | 39             | 72            | 4                 | 1.324                           | 105.9        | 100.4         | LC-2            |
| 5     | 2.5                 | 10:0                 | 321.51                 | 0.35                              | 45              | 248             | 1.2                             | 253             | 253              | 41             | 69            | 4                 | 1.153                           | 108.7        | 101.8         |                 |
| 6     | 2.5                 | 12:30                | 323.08                 | 0.3                               | 45              | 257             | 0.98                            | 253             | 255              | 41             | 69            | 3.5               | 0.976                           | 106.5        | 102.5         |                 |
| 1     | 2.5                 | 15:0                 | 324.496                | 0.55                              | 45              | 257             | 1.8                             | 257             | 255              | 42             | 69            | 5                 | 1.791                           | 93.2         | 101.0         | LC-3            |
| 2     | 2.5                 | 17:30                | 326.17                 | 0.59                              | 46              | 264             | 1.9                             | 257             | 256              | 43             | 69            | 5                 | 1.903                           | 93.8         | 100.0         |                 |
| 3     | 2.5                 | 20:0                 | 327.91                 | 0.62                              | 46              | 252             | 2                               | 258             | 256              | 44             | 70            | 6                 | 2.032                           | 99.1         | 99.9          |                 |
| 4     | 2.5                 | 22:30                | 329.81                 | 0.71                              | 47              | 258             | 2.3                             | 258             | 256              | 45             | 73            | 7                 | 2.312                           | 93.9         | 99.2          | LC-4            |
| 5     | 2.5                 | 25:0                 | 331.73                 | 0.7                               | 47              | 247             | 2.3                             | 257             | 256              | 48             | 75            | 7                 | 2.313                           | 96.8         | 98.9          |                 |
| 6     | 2.5                 | 27:30                | 333.71                 | 0.61                              | 47              | 244             | 2                               | 257             | 255              | 51             | 77            | 6                 | 2.024                           | 105.6        | 99.5          |                 |
| 1     | 2.5                 | 30:0                 | 335.734                | 0.4                               | 47              | 246             | 1.3                             | 246             | 245              | 48             | 69            | 4                 | 1.325                           | 106.7        | 100.0         | LC-5            |
| 2     | 2.5                 | 32:30                | 337.39                 | 0.45                              | 48              | 262             | 1.5                             | 245             | 255              | 44             | 69            | 4.5               | 1.463                           | 100.0        | 100.0         |                 |
| 3     | 2.5                 | 35:0                 | 339.02                 | 0.72                              | 48              | 247             | 2.4                             | 253             | 250              | 44             | 71            | 5                 | 2.389                           | 90.9         | 99.3          |                 |
| 4     | 2.5                 | 37:30                | 340.91                 | 0.77                              | 48              | 258             | 2.5                             | 253             | 247              | 42             | 70            | 6                 | 2.510                           | 106.4        | 99.8          | LC-6            |
| 5     | 2.5                 | 40:0                 | 343.18                 | 0.78                              | 48              | 243             | 2.6                             | 250             | 249              | 42             | 71            | 6                 | 2.596                           | 101.0        | 99.9          |                 |
| 6     | 2.5                 | 42:30                | 345.37                 | 0.71                              | 48              | 239             | 2.4                             | 253             | 250              | 42             | 71            | 6                 | 2.376                           | 93.6         | 99.5          |                 |
| 1     | 2.5                 | 45:0                 | 347.314                | 0.46                              | 49              | 261             | 1.5                             | 253             | 257              | 42             | 70            | 5                 | 1.496                           | 100.2        | 99.6          | LC-7            |
| 2     | 2.5                 | 47:30                | 348.97                 | 0.57                              | 49              | 254             | 1.9                             | 250             | 249              | 41             | 72            | 5                 | 1.876                           | 95.8         | 99.4          |                 |
| 3     | 2.5                 | 50:0                 | 350.74                 | 0.6                               | 49              | 257             | 2                               | 254             | 259              | 42             | 72            | 5                 | 1.965                           | 104.2        | 99.6          |                 |
| 4     | 2.5                 | 52:30                | 352.71                 | 0.42                              | 49              | 269             | 1.4                             | 252             | 257              | 42             | 72            | 5                 | 1.352                           | 101.9        | 99.7          | LC-8            |
| 5     | 2.5                 | 55:0                 | 354.31                 | 0.37                              | 50              | 241             | 1.2                             | 251             | 245              | 42             | 72            | 5                 | 1.243                           | 101.5        | 99.8          |                 |
| 6     | 2.5                 | 57:30                | 355.84                 | 0.3                               | 50              | 243             | 1.1                             | 248             | 250              | 43             | 72            | 5                 | 1.006                           | 107.4        | 100.0         |                 |
|       |                     | 1:00:0               | 357.296                |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |

| Total | Averages |                      |      |       |                     | Maximum and Minimum Values |     |    |    |   |
|-------|----------|----------------------|------|-------|---------------------|----------------------------|-----|----|----|---|
| Vm    | 42.638   | 0.530                | 46.9 | 252.2 | 1.783               | 260                        | 259 | 51 | 77 | 7 |
| Vmstd | 43.536   | in. H <sub>2</sub> O | °F   | °F    | in H <sub>2</sub> O | 245                        | 245 | 37 | 69 |   |

| Run ISO |
|---------|
| 106.4   |
| %       |

Run Notes:

---



---



---

**Air Control Techniques, P.C.**  
**Isokinetic Sampling Train Field Data Sheet**

|              |               |                 |
|--------------|---------------|-----------------|
| <b>Job #</b> | <b>Run ID</b> | <b>M5/202-2</b> |
| 2333         | Method        | 5/202           |

| IDENTIFICATION INFORMATION |                   |            |                   | PRELIMINARY CHECKS AND DATA                  |       |                  |       |
|----------------------------|-------------------|------------|-------------------|----------------------------------------------|-------|------------------|-------|
| Plant                      | Enviva, Greenwood |            |                   | Actual                                       | Req'd | Vacuum           |       |
| City, State                | Greenwood, SC     |            |                   | Pre Leak Check, ACFM                         | 0.00  | <0.02 or 4%      | 9     |
| Test Location              | Dryer             |            |                   | Post Leak Check, ACFM                        | 0.00  | 0.020            | 11    |
| Date                       | 12/5/18           |            | Filter ID 1       | A B                                          |       |                  |       |
| Start                      | 10:47             |            | Filter ID 2       | Pitot Pre Leak Check                         | 3     | 4.5              |       |
| Stop                       | 11:57             |            | Filter ID 3       | Pitot Post Leak Check                        | 5     | 4                |       |
| Meterbox ID                | 909033            | TH, JG, EC | Personnel         | Ambient Temperature                          | 49    |                  |       |
| ΔH <sub>0</sub>            | 1.898             | 4B         | Stack TC ID       | Static Pressure, In. H <sub>2</sub> O        | -0.39 |                  |       |
| Gamma (Y)                  | 0.9744            |            | Tedlar Bags       | Barometric Pressure, In. Hg                  | 29.97 |                  |       |
| Ideal Nozzle               | 0.313             |            | Orsat Pump        |                                              |       |                  |       |
| Nozzle Dia.                | 0.302             |            | Probe Length/Type | <b>ACTUAL MOISTURE &amp; GAS COMPOSITION</b> |       |                  |       |
| Nozzle ID                  | 4-3               | 2.91       | K Factor          | Water Recovered, grams                       | 519.1 | Moisture, %      | 38.68 |
| Probe ID                   | 4B                | 0          | Umbilicle ID      | CO <sub>2</sub> %                            | 7.56  | O <sub>2</sub> % | 12.78 |

| Sampling Information |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|----------------------|---------------------|----------------------|------------------------|-----------------------------------|-----------------|-----------------|---------------------------------|-----------------|------------------|----------------|---------------|-------------------|---------------------------------|--------------|-----------------|
| Point                | Time Per Pt. (Min.) | Elapsed Time (h:m:s) | Dry Gas Meter (cu.ft.) | Velocity ΔP (In H <sub>2</sub> O) | Meter Temp (°F) | Stack Temp (°F) | Actual ΔH (In H <sub>2</sub> O) | Probe Temp (°F) | Filter Temp (°F) | Exit Temp (°F) | CPM Temp (°F) | Pump Vac (in. Hg) | Target ΔH (in H <sub>2</sub> O) | Run ISO % Pt | Lk √ During Run |
| 1                    | 2.5                 | 0                    | 358.986                | 0.4                               | 50              | 255             | 1.2                             | 250             | 245              | 43             | 70            | 3                 | 1.166                           | 104.5        | LC 1            |
| 2                    | 2.5                 | 2:30                 | 360.51                 | 0.46                              | 50              | 248             | 1.4                             | 250             | 242              | 40             | 69            | 3                 | 1.356                           | 103.8        |                 |
| 3                    | 2.5                 | 5:0                  | 362.14                 | 0.5                               | 51              | 57              | 2                               | 267             | 258              | 39             | 69            | 4                 | 2.021                           | 98.1         |                 |
| 4                    | 2.5                 | 7:30                 | 364.02                 | 0.76                              | 51              | 247             | 2.2                             | 264             | 255              | 41             | 70            | 4                 | 2.243                           | 98.5         | LC-2            |
| 5                    | 2.5                 | 10:0                 | 366.01                 | 0.84                              | 51              | 247             | 2.5                             | 243             | 256              | 41             | 70            | 5                 | 2.478                           | 101.8        |                 |
| 6                    | 2.5                 | 12:30                | 368.17                 | 0.51                              | 52              | 238             | 1.5                             | 256             | 254              | 44             | 72            | 3.5               | 1.526                           | 100.3        |                 |
| 1                    | 2.5                 | 15:0                 | 369.847                | 0.52                              | 53              | 255             | 1.5                             | 242             | 257              | 44             | 70            | 3.5               | 1.525                           | 100.1        | LC-3            |
| 2                    | 2.5                 | 17:30                | 371.52                 | 0.58                              | 53              | 246             | 1.75                            | 241             | 253              | 46             | 75            | 4                 | 1.723                           | 99.2         |                 |
| 3                    | 2.5                 | 20:0                 | 373.28                 | 0.63                              | 53              | 255             | 2                               | 253             | 257              | 46             | 79            | 4.5               | 1.847                           | 108.9        |                 |
| 4                    | 2.5                 | 22:30                | 375.28                 | 0.675                             | 54              | 265             | 1.95                            | 251             | 256              | 48             | 79            | 4.5               | 1.954                           | 90.9         | LC-4            |
| 5                    | 2.5                 | 25:0                 | 377                    | 0.72                              | 54              | 255             | 2.2                             | 258             | 259              | 49             | 78            | 5                 | 2.114                           | 105.8        |                 |
| 6                    | 2.5                 | 27:30                | 379.08                 | 0.75                              | 54              | 244             | 2.3                             | 253             | 259              | 50             | 78            | 5                 | 2.235                           | 99.9         |                 |
| 1                    | 2.5                 | 30:0                 | 381.1                  | 0.54                              | 54              | 248             | 1.6                             | 245             | 251              | 50             | 79            | 4                 | 1.600                           | 104.4        | LC-5            |
| 2                    | 2.5                 | 32:30                | 382.89                 | 0.61                              | 54              | 245             | 1.8                             | 254             | 257              | 49             | 78            | 4                 | 1.818                           | 92.6         |                 |
| 3                    | 2.5                 | 35:0                 | 384.58                 | 0.56                              | 54              | 267             | 1.6                             | 232             | 258              | 48             | 79            | 4                 | 1.618                           | 102.2        |                 |
| 4                    | 2.5                 | 37:30                | 386.34                 | 0.45                              | 54              | 243             | 1.3                             | 256             | 252              | 48             | 76            | 4                 | 1.345                           | 103.1        | LC-6            |
| 5                    | 2.5                 | 40:0                 | 387.96                 | 0.42                              | 55              | 258             | 1.2                             | 257             | 262              | 47             | 71            | 3.5               | 1.232                           | 94.3         |                 |
| 6                    | 2.5                 | 42:30                | 389.38                 | 0.28                              | 55              | 238             | 0.85                            | 256             | 257              | 46             | 71            | 3                 | 0.845                           | 103.9        |                 |
| 1                    | 2.5                 | 45:0                 | 390.677                | 0.3                               | 56              | 242             | 0.9                             | 250             | 252              | 46             | 71            | 3                 | 0.903                           | 101.8        | LC-7            |
| 2                    | 2.5                 | 47:30                | 391.99                 | 0.22                              | 56              | 250             | 0.65                            | 232             | 251              | 43             | 72            | 2.5               | 0.655                           | 96.4         |                 |
| 3                    | 2.5                 | 50:0                 | 393.05                 | 0.21                              | 56              | 263             | 0.61                            | 252             | 255              | 43             | 72            | 2.5               | 0.614                           | 109.0        |                 |
| 4                    | 2.5                 | 52:30                | 394.21                 | 0.3                               | 56              | 241             | 0.69                            | 257             | 256              | 43             | 74            | 2.5               | 0.905                           | 97.5         | LC-8            |
| 5                    | 2.5                 | 55:0                 | 395.47                 | 0.21                              | 57              | 247             | 0.63                            | 253             | 256              | 43             | 73            | 2                 | 0.629                           | 90.9         |                 |
| 6                    | 2.5                 | 57:30                | 396.45                 | 0.2                               | 57              | 238             | 0.61                            | 253             | 255              | 43             | 74            | 2                 | 0.607                           | 101.8        |                 |
|                      |                     | 1:00:0               | 397.528                |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |

|                   | Total  | Averages             |      |       |                     |     | Maximum and Minimum Values |    |    |   |  | Run ISO |
|-------------------|--------|----------------------|------|-------|---------------------|-----|----------------------------|----|----|---|--|---------|
| V <sub>m</sub>    | 38.542 | 0.465                | 53.8 | 241.3 | 1.456               | 267 | 262                        | 50 | 79 | 5 |  | 99.3    |
| V <sub>mstd</sub> | 38.800 | in. H <sub>2</sub> O | °F   | °F    | in H <sub>2</sub> O | 232 | 242                        | 39 | 69 |   |  | %       |

Run Notes:

---



---



---

**Air Control Techniques, P.C.**  
**Isokinetic Sampling Train Field Data Sheet**

|              |               |                 |
|--------------|---------------|-----------------|
| <b>Job #</b> | <b>Run ID</b> | <b>M5/202-3</b> |
| 2333         | <b>Method</b> | 5/202           |

| IDENTIFICATION INFORMATION                   |                   |            |                   | PRELIMINARY CHECKS AND DATA           |                  |             |        |
|----------------------------------------------|-------------------|------------|-------------------|---------------------------------------|------------------|-------------|--------|
| Plant                                        | Enviva, Greenwood |            |                   | Pre Leak Check, ACFM                  | Actual           | Req'd       | Vacuum |
| City, State                                  | Greenwood, SC     |            |                   |                                       | 0.00             | <0.02 or 4% | 9      |
| Test Location                                | Dryer             |            |                   | Post Leak Check, ACFM                 | 0.00             | 0.020       | 10.5   |
| Date                                         | 12/5/18           |            | Filter ID 1       | A B                                   |                  |             |        |
| Start                                        | 12:15             |            | Filter ID 2       | Pitot Pre Leak Check                  |                  |             |        |
| Stop                                         | 13:27             |            | Filter ID 3       | Pitot Post Leak Check                 |                  |             |        |
| Meterbox ID                                  | 909033            | TH, JG, EC | Personnel         | Ambient Temperature                   |                  |             |        |
| ΔH@                                          | 1.898             | 4A         | Stack TC ID       | Static Pressure, In. H <sub>2</sub> O |                  |             |        |
| Gamma (Y)                                    | 0.9744            |            | Tedlar Bags       | Barometric Pressure, In. Hg           |                  |             |        |
| Ideal Nozzle                                 | 0.319             |            | Orsat Pump        |                                       |                  |             |        |
| Nozzle Dia.                                  | 0.302             |            | Probe Length/Type |                                       |                  |             |        |
| Nozzle ID                                    | M22               | 3.06       | K Factor          |                                       |                  |             |        |
| Probe ID                                     | 4A                | 0          | Umbilicle ID      |                                       |                  |             |        |
| <b>ACTUAL MOISTURE &amp; GAS COMPOSITION</b> |                   |            |                   |                                       |                  |             |        |
| Water Recovered, grams                       |                   |            |                   | 479.9                                 | Moisture, %      |             | 37.17  |
| CO <sub>2</sub> %                            |                   |            |                   | 7.12                                  | O <sub>2</sub> % |             | 13.40  |

| Sampling Information |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|----------------------|---------------------|----------------------|------------------------|-----------------------------------|-----------------|-----------------|---------------------------------|-----------------|------------------|----------------|---------------|-------------------|---------------------------------|--------------|---------------|-----------------|
| Point                | Time Per Pt. (Min.) | Elapsed Time (h:m:s) | Dry Gas Meter (cu.ft.) | Velocity ΔP (In H <sub>2</sub> O) | Meter Temp (°F) | Stack Temp (°F) | Actual ΔH (in H <sub>2</sub> O) | Probe Temp (°F) | Filter Temp (°F) | Exit Temp (°F) | CPM Temp (°F) | Pump Vac (in. Hg) | Target ΔH (in H <sub>2</sub> O) | Run ISO % Pt | Run ISO % Cum | Lk √ During Run |
| 1                    | 2.5                 | 0                    | 397.799                | 0.32                              | 58              | 245             | 0.89                            | 254             | 227              | 49             | 69            | 3                 | 0.983                           | 98.5         | 98.5          | LC 1            |
| 2                    | 2.5                 | 2:30                 | 399.13                 | 0.23                              | 59              | 266             | 0.62                            | 260             | 256              | 43             | 79            | 2                 | 0.688                           | 91.9         | 95.6          |                 |
| 3                    | 2.5                 | 5:0                  | 400.17                 | 0.22                              | 59              | 254             | 0.61                            | 260             | 253              | 43             | 76            | 2                 | 0.670                           | 99.5         | 96.8          |                 |
| 4                    | 2.5                 | 7:30                 | 401.28                 | 0.22                              | 59              | 247             | 0.61                            | 256             | 252              | 43             | 73            | 2                 | 0.677                           | 94.5         | 96.3          | LC-2            |
| 5                    | 2.5                 | 10:0                 | 402.34                 | 0.2                               | 59              | 262             | 0.54                            | 261             | 253              | 43             | 69            | 2                 | 0.602                           | 99.2         | 96.8          |                 |
| 6                    | 2.5                 | 12:30                | 403.39                 | 0.2                               | 60              | 247             | 0.56                            | 260             | 256              | 44             | 69            | 2                 | 0.616                           | 95.4         | 96.6          |                 |
| 1                    | 2.5                 | 15:0                 | 404.412                | 0.58                              | 61              | 248             | 1.6                             | 250             | 254              | 45             | 72            | 4                 | 1.789                           | 100.3        | 97.4          | LC-3            |
| 2                    | 2.5                 | 17:30                | 406.24                 | 0.57                              | 61              | 257             | 1.6                             | 254             | 236              | 43             | 70            | 4                 | 1.731                           | 91.4         | 96.4          |                 |
| 3                    | 2.5                 | 20:0                 | 407.88                 | 0.6                               | 61              | 239             | 1.7                             | 255             | 250              | 44             | 69            | 4                 | 1.869                           | 90.1         | 95.5          |                 |
| 4                    | 2.5                 | 22:30                | 409.56                 | 0.45                              | 62              | 247             | 1.3                             | 256             | 256              | 45             | 71            | 3.5               | 1.388                           | 94.4         | 95.4          | LC-4            |
| 5                    | 2.5                 | 25:0                 | 411.08                 | 0.38                              | 62              | 266             | 1                               | 256             | 258              | 46             | 69            | 3                 | 1.143                           | 98.9         | 95.7          |                 |
| 6                    | 2.5                 | 27:30                | 412.525                | 0.335                             | 62              | 244             | 1                               | 253             | 256              | 46             | 69            | 3                 | 1.040                           | 97.7         | 95.9          |                 |
| 1                    | 2.5                 | 30:0                 | 413.886                | 0.52                              | 63              | 256             | 1.4                             | 257             | 257              | 47             | 70            | 4                 | 1.590                           | 92.5         | 95.5          | LC-5            |
| 2                    | 2.5                 | 32:30                | 415.48                 | 0.56                              | 63              | 240             | 1.6                             | 256             | 257              | 47             | 72            | 4                 | 1.750                           | 93.5         | 95.4          |                 |
| 3                    | 2.5                 | 35:0                 | 417.17                 | 0.72                              | 64              | 247             | 2.2                             | 255             | 258              | 48             | 72            | 5                 | 2.231                           | 93.1         | 95.2          |                 |
| 4                    | 2.5                 | 37:30                | 419.07                 | 0.72                              | 64              | 251             | 1.9                             | 260             | 255              | 50             | 75            | 5                 | 2.215                           | 98.2         | 95.4          | LC-6            |
| 5                    | 2.5                 | 40:0                 | 421.07                 | 0.62                              | 64              | 247             | 1.9                             | 258             | 257              | 51             | 77            | 5                 | 1.919                           | 106.6        | 96.3          |                 |
| 6                    | 2.5                 | 42:30                | 423.09                 | 0.63                              | 64              | 244             | 2                               | 256             | 255              | 51             | 79            | 5                 | 1.959                           | 96.4         | 96.3          |                 |
| 1                    | 2.5                 | 45:0                 | 424.934                | 0.35                              | 64              | 245             | 1.1                             | 251             | 242              | 48             | 74            | 3.5               | 1.086                           | 106.1        | 96.7          | LC-7            |
| 2                    | 2.5                 | 47:30                | 426.45                 | 0.56                              | 64              | 244             | 1.7                             | 245             | 247              | 47             | 74            | 4                 | 1.744                           | 98.6         | 96.9          |                 |
| 3                    | 2.5                 | 50:0                 | 428.23                 | 0.75                              | 64              | 253             | 2.3                             | 254             | 254              | 46             | 73            | 5.5               | 2.303                           | 97.4         | 96.9          |                 |
| 4                    | 2.5                 | 52:30                | 430.25                 | 0.85                              | 64              | 251             | 2.6                             | 255             | 254              | 47             | 73            | 5.5               | 2.614                           | 97.8         | 96.9          | LC-8            |
| 5                    | 2.5                 | 55:0                 | 432.41                 | 0.85                              | 64              | 254             | 2                               | 251             | 232              | 47             | 75            | 5                 | 2.601                           | 92.0         | 96.6          |                 |
| 6                    | 2.5                 | 57:30                | 434.44                 | 0.78                              | 65              | 251             | 2.4                             | 257             | 247              | 46             | 74            | 5                 | 2.405                           | 92.5         | 96.4          |                 |
|                      | 2.5                 | 1:00:0               | 436.401                |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |

| Total        | Averages             |      |       |                     | Maximum and Minimum Values |     |    |    |   |
|--------------|----------------------|------|-------|---------------------|----------------------------|-----|----|----|---|
| Vm 38.602    | 0.485                | 62.1 | 250.2 | 1.464               | 261                        | 258 | 51 | 79 | 6 |
| Vmstd 38.240 | in. H <sub>2</sub> O | °F   | °F    | in H <sub>2</sub> O | 245                        | 227 | 43 | 69 |   |

| Run ISO |
|---------|
| 94.4    |
| %       |

Run Notes:

---



---



---



**Method 4 - Air Control Techniques, P.C.**

Date 12/5/2018

**Source Information**

|                   |                   |           |         |
|-------------------|-------------------|-----------|---------|
| Plant Name        | Enviva, Greenwood | Job #     | 2333    |
| City, State       | Greenwood, SC     | Personnel | TTB, JG |
| Sampling Location | Dryer             | Balance   |         |

**Sampling Information**

|                       |           |           |           |  |
|-----------------------|-----------|-----------|-----------|--|
| Run Number            | M5/202-1  | M5/202-2  | M5/202-3  |  |
| Filter Identification | 14653     | 14654     | 14655     |  |
| Sampling Date         | 12/5/2018 | 12/5/2018 | 12/5/2018 |  |

**Moisture Data**Impinger 1 - Empty

|                        |       |       |       |  |
|------------------------|-------|-------|-------|--|
| Final Weight, grams    | 961.8 | 870.3 | 850.6 |  |
| Initial Weight, grams  | 396.8 | 400.1 | 397.1 |  |
| Condensed Water, grams | 565.0 | 470.2 | 453.5 |  |

Impinger 2 - Empty

|                        |       |       |       |  |
|------------------------|-------|-------|-------|--|
| Final Weight, grams    | 610.0 | 611.6 | 588.7 |  |
| Initial Weight, grams  | 592.8 | 593.2 | 580.8 |  |
| Condensed Water, grams | 17.2  | 18.4  | 7.9   |  |

Impinger 3

|                        |       |       |       |  |
|------------------------|-------|-------|-------|--|
| Final Weight, grams    | 696.5 | 777.2 | 704.2 |  |
| Initial Weight, grams  | 688.2 | 760.4 | 696.5 |  |
| Condensed Water, grams | 8.3   | 16.8  | 7.7   |  |

Silica Gel

|                       |       |       |       |  |
|-----------------------|-------|-------|-------|--|
| Final Weight, grams   | 832.7 | 841.7 | 821.9 |  |
| Initial Weight, grams | 820.6 | 828.0 | 811.1 |  |
| Adsorbed Water, grams | 12.1  | 13.7  | 10.8  |  |

|                    |       |       |       |  |
|--------------------|-------|-------|-------|--|
| Total Water, grams | 602.6 | 519.1 | 479.9 |  |
|--------------------|-------|-------|-------|--|

**Sampling Train Purge Data**

|             |      |      |      |  |
|-------------|------|------|------|--|
| Purge Start | 1008 | 1211 | 1345 |  |
| Purge End   | 1108 | 1311 | 1445 |  |

**Plant Name** Enviva, Greenwood  
**City, State** Greenwood, SC

**Project #** 2333  
**Test Location** Dryer

| Parameter                                       | Nomenclature/<br>Units        | M5/202-1      | M5/202-2      | M5/202-3      | Averages      |
|-------------------------------------------------|-------------------------------|---------------|---------------|---------------|---------------|
| Date                                            |                               | 12/5/2018     | 12/5/2018     | 12/5/2018     |               |
| Run Time                                        | θ, minutes                    | 60            | 60            | 60            |               |
| Nozzle Diameter                                 | inches                        | 0.302         | 0.302         | 0.302         |               |
| Stack Area                                      | As - sq. ft.                  | 54.54         | 54.54         | 54.54         |               |
| Production Rate                                 | ODT/hour                      | 67.0          | 64.1          | 64.7          | 65.3          |
| Pitot Tube Coefficient                          | Cp                            | 0.84          | 0.84          | 0.84          |               |
| Meter Calibration Factor                        | Y                             | 0.9744        | 0.9744        | 0.9744        |               |
| Barometric Pressure, inches Hg                  | Bp - in Hg                    | 29.97         | 29.97         | 29.97         |               |
| Static Pressure                                 | Pg - in. H <sub>2</sub> O     | -0.39         | -0.39         | -0.39         |               |
| Stack Pressure                                  | Ps - in.Hg                    | 29.94         | 29.94         | 29.94         |               |
| Meter Box Pressure Differential                 | Δ H - in. H <sub>2</sub> O    | 1.78          | 1.46          | 1.46          |               |
| Average Velocity Head                           | Δ P - in. H <sub>2</sub> O    | 0.5303        | 0.4654        | 0.4851        |               |
| Volume of Gas Sampled                           | V <sub>m</sub> - cu. ft.      | 42.638        | 38.542        | 38.602        |               |
| Dry Gas Meter Temperature                       | T <sub>m</sub> - °F           | 46.9          | 53.8          | 62.1          |               |
| Stack Temperature                               | T <sub>s</sub> - °F           | 252.2         | 241.3         | 250.2         | 247.9         |
| Stack Temperature                               | T <sub>s</sub> - °C           | 122.3         | 116.3         | 121.2         |               |
| Liquid Collected                                | grams                         | 602.6         | 519.1         | 479.9         |               |
| Oxygen                                          | O <sub>2</sub> %              | 12.53         | 12.78         | 13.40         | 12.90         |
| Carbon Dioxide                                  | CO <sub>2</sub> %             | 7.89          | 7.56          | 7.12          | 7.52          |
| Nitrogen                                        | N <sub>2</sub> %              | 79.58         | 79.66         | 79.48         |               |
| Volume of Gas Sampled, Dry                      | V <sub>m(std)</sub> - cu. ft. | 43.536        | 38.800        | 38.240        | 40.192        |
| Volume of Gas Sampled, Dry                      | V <sub>m(std)</sub> - cu. M   | 1.233         | 1.099         | 1.083         |               |
| Volume of Gas Sampled, Dry                      | V <sub>m(std)</sub> - N cu. M | 1.148         | 1.023         | 1.008         |               |
| Volume of Water Vapor                           | V <sub>w(std)</sub> - cu. ft. | 28.413        | 24.476        | 22.627        |               |
| Moisture Content                                | % H <sub>2</sub> O            | 39.49         | 38.68         | 37.17         | 38.45         |
| Saturation Moisture                             | % H <sub>2</sub> O            | 100.00        | 100.00        | 100.00        |               |
| Dry Mole Fraction                               | M <sub>fd</sub>               | 0.605         | 0.613         | 0.628         |               |
| Gas Molecular Weight, Dry                       | M <sub>d</sub>                | 29.76         | 29.72         | 29.68         |               |
| Gas Molecular Weight, Wet                       | M <sub>s</sub>                | 25.12         | 25.19         | 25.34         |               |
| Gas Velocity                                    | vs - ft./sec.                 | 50.89         | 47.24         | 48.40         | 48.84         |
| Gas Velocity                                    | m/sec.                        | 15.51         | 14.40         | 14.75         |               |
| Volumetric Air Flow, Actual                     | Q <sub>aw</sub> - ACFM        | 166,531       | 154,608       | 158,373       | 159,837       |
| Volumetric Air Flow, Actual                     | m <sup>3</sup> /min           | 4,716         | 4,378         | 4,485         |               |
| Volumetric Air Flow, Standard                   | Q <sub>sd</sub> - DSCFM       | 74,759        | 71,425        | 74,025        | 73,403        |
| Volumetric Air Flow, Standard                   | Nm <sup>3</sup> /min          | 1,971         | 1,883         | 1,952         |               |
| Isokinetic Sampling Rate                        | I %                           | 106.4         | 99.3          | 94.4          |               |
| <b>FILTERABLE PARTICULATE MATTER EMISSIONS</b>  |                               |               |               |               |               |
| Filterable Particulate Catch                    | mg                            | 2.5           | 1.4           | 0.5           |               |
| Concentration                                   | gr/DSCF                       | 0.0009        | 0.0006        | 0.0002        | 0.0005        |
| Mass Emission Rate                              | lb/hr                         | <b>0.57</b>   | <b>0.34</b>   | <b>0.13</b>   | <b>0.35</b>   |
| Mass Emission Rate                              | lbs./ODT                      | <b>0.0085</b> | <b>0.0053</b> | <b>0.0020</b> | <b>0.0053</b> |
| <b>CONDENSABLE PARTICULATE MATTER EMISSIONS</b> |                               |               |               |               |               |
| Condensable Particulate Catch                   | mg                            | 7.5           | 6             | 5.2           |               |
| Concentration                                   | gr/DSCF                       | 0.0027        | 0.0024        | 0.0021        | 0.0024        |
| Mass Emission Rate                              | lbs./hr                       | <b>1.70</b>   | <b>1.46</b>   | <b>1.33</b>   | <b>1.50</b>   |
| Mass Emission Rate                              | lbs./ODT                      | <b>0.025</b>  | <b>0.023</b>  | <b>0.021</b>  | <b>0.023</b>  |
| <b>TOTAL PARTICULATE MATTER EMISSIONS</b>       |                               |               |               |               |               |
| Mass Emission Rate                              | lb/hr                         | <b>2.3</b>    | <b>1.8</b>    | <b>1.5</b>    | <b>1.8</b>    |
| Mass Emission Rate                              | lbs./ODT                      | <b>0.034</b>  | <b>0.028</b>  | <b>0.023</b>  | <b>0.028</b>  |

Date 12/3/2018

|                                                   |                   |            |
|---------------------------------------------------|-------------------|------------|
| Client                                            | Enviva            |            |
| Job #                                             | 2333              |            |
| Plant Name                                        | Enviva, Greenwood |            |
| City, State                                       | Greenwood, SC     |            |
| Sampling Location                                 | Dry Hammermill    |            |
| No. of Ports Available                            | 4                 |            |
| No. of Ports Used                                 | 4                 |            |
| Port Inside Diameter, Inches                      | 4                 |            |
| Distance From Far Wall To Outside Of Port, Inches | 68.5              |            |
| Nipple Length And/Or Wall Thickness, Inches       | 6                 |            |
| Depth Of Stack Or Duct, Inches                    | 62.5              |            |
| Stack Or Duct Width (if rectangular), Inches      |                   |            |
| Equiv. Diameter = $2DW/(D+W)$ , Inches            |                   |            |
| Stack/Duct Area, Square Feet                      | 21.305            |            |
| $(\pi R^2 \text{ or } L \times W)$                |                   |            |
|                                                   | Upstream          | Downstream |
| Distance to Flow Disturbances, feet               | 5.7               | 25         |
| Diameters                                         | 1.09              | 4.8        |

[illegible]

|                       |                       |
|-----------------------|-----------------------|
| 0.0000 - 0.0625 - 0   | 0.5625 - 0.6875 - 5/8 |
| 0.0625 - 0.1875 - 1/8 | 0.6875 - 0.8125 - 3/4 |
| 0.1875 - 0.3125 - 1/4 | 0.8125 - 0.9375 - 7/8 |
| 0.3125 - 0.4375 - 3/8 | 0.9375 - 1.0000 - 1   |
| 0.4375 - 0.5625 - 1/2 |                       |

| Diameters |       |       |             |
|-----------|-------|-------|-------------|
| Velocity  | Up    | Down  | Particulate |
| 12        | >7.00 | >1.75 | 12          |
| 12        | 6     | 1.5   | 16          |
| 16        | 5     | 1.25  | 20          |
| 16        | 2     | 0.5   | 24 or 25    |

Note: If more than 8 and 2 diameters and duct is greater than 12" and less than 24", use 8 or 9 points.

| Location of Points in Circular Stacks or Ducts |      |      |      |      |      |      |      |      |      |      |      |
|------------------------------------------------|------|------|------|------|------|------|------|------|------|------|------|
|                                                | 4    | 6    | 8    | 10   | 12   | 14   | 16   | 18   | 20   | 22   | 24   |
| 1                                              | 6.7  | 4.4  | 3.2  | 2.6  | 2.1  | 1.8  | 1.6  | 1.4  | 1.3  | 1.1  | 1.1  |
| 2                                              | 25.0 | 14.6 | 10.5 | 8.2  | 6.7  | 5.7  | 4.9  | 4.4  | 3.9  | 3.5  | 3.2  |
| 3                                              | 75.0 | 29.6 | 19.4 | 14.6 | 11.8 | 9.9  | 8.5  | 7.5  | 6.7  | 6.0  | 5.5  |
| 4                                              | 93.3 | 70.4 | 32.3 | 22.6 | 17.7 | 14.6 | 12.5 | 10.9 | 9.7  | 8.7  | 7.9  |
| 5                                              |      | 85.4 | 67.7 | 34.2 | 25.0 | 20.1 | 16.9 | 14.6 | 12.9 | 1106 | 10.5 |
| 6                                              |      | 95.6 | 80.6 | 65.8 | 35.6 | 26.9 | 22.0 | 18.8 | 16.5 | 14.6 | 13.2 |
| 7                                              |      |      | 89.5 | 77.4 | 64.4 | 36.6 | 28.3 | 23.6 | 20.4 | 18.0 | 16.1 |
| 8                                              |      |      | 96.8 | 85.4 | 75.0 | 63.4 | 37.5 | 29.6 | 25.0 | 21.8 | 19.4 |
| 9                                              |      |      |      | 91.8 | 82.3 | 73.1 | 62.5 | 38.2 | 30.6 | 26.2 | 23   |
| 10                                             |      |      |      | 97.4 | 88.2 | 79.9 | 71.7 | 61.8 | 38.8 | 31.5 | 27.2 |
| 11                                             |      |      |      |      | 93.3 | 85.4 | 78.0 | 70.4 | 61.2 | 39.3 | 32.3 |
| 12                                             |      |      |      |      | 97.9 | 90.1 | 83.1 | 76.4 | 69.4 | 60.7 | 39.8 |
| 13                                             |      |      |      |      |      | 94.3 | 87.5 | 81.2 | 75   | 68.5 | 60.2 |
| 14                                             |      |      |      |      |      | 98.2 | 91.5 | 85.4 | 79.6 | 73.8 | 67.7 |
| 15                                             |      |      |      |      |      |      | 95.1 | 89.1 | 83.5 | 78.2 | 72.8 |
| 16                                             |      |      |      |      |      |      | 98.4 | 92.5 | 87.1 | 82.0 | 77   |
| 17                                             |      |      |      |      |      |      |      | 95.6 | 90.3 | 85.4 | 80.6 |
| 18                                             |      |      |      |      |      |      |      | 98.6 | 93.3 | 88.4 | 83.9 |
| 19                                             |      |      |      |      |      |      |      |      | 96.1 | 91.3 | 86.8 |
| 20                                             |      |      |      |      |      |      |      |      | 98.7 | 94.0 | 89.5 |
| 21                                             |      |      |      |      |      |      |      |      |      | 96.5 | 92.1 |
| 22                                             |      |      |      |      |      |      |      |      |      | 98.9 | 94.5 |
| 23                                             |      |      |      |      |      |      |      |      |      |      | 96.8 |
| 24                                             |      |      |      |      |      |      |      |      |      |      | 99.  |

[illegible]



**Air Control Techniques, P.C.**  
**Isokinetic Sampling Train Field Data Sheet**

|              |               |                 |
|--------------|---------------|-----------------|
| <b>Job #</b> | <b>Run ID</b> | <b>M5/202-1</b> |
| <b>2333</b>  | <b>Method</b> | <b>5/202</b>    |

| IDENTIFICATION INFORMATION            |                   |                  |                   | PRELIMINARY CHECKS AND DATA                                                                                                                                                                                                                                                 |  |  |  |                        |        |                                       |                      |                             |       |                       |       |                       |      |       |   |
|---------------------------------------|-------------------|------------------|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|------------------------|--------|---------------------------------------|----------------------|-----------------------------|-------|-----------------------|-------|-----------------------|------|-------|---|
| Plant                                 | Enviva, Greenwood |                  |                   | <table border="1"> <tr> <td></td> <td>Actual</td> <td>Req'd</td> <td>Vacuum</td> </tr> <tr> <td>Pre Leak Check, ACFM</td> <td>0.00</td> <td>&lt;0.02 or 4%</td> <td>6</td> </tr> <tr> <td>Post Leak Check, ACFM</td> <td>0.00</td> <td>0.020</td> <td>8</td> </tr> </table> |  |  |  |                        | Actual | Req'd                                 | Vacuum               | Pre Leak Check, ACFM        | 0.00  | <0.02 or 4%           | 6     | Post Leak Check, ACFM | 0.00 | 0.020 | 8 |
|                                       | Actual            | Req'd            | Vacuum            |                                                                                                                                                                                                                                                                             |  |  |  |                        |        |                                       |                      |                             |       |                       |       |                       |      |       |   |
| Pre Leak Check, ACFM                  | 0.00              | <0.02 or 4%      | 6                 |                                                                                                                                                                                                                                                                             |  |  |  |                        |        |                                       |                      |                             |       |                       |       |                       |      |       |   |
| Post Leak Check, ACFM                 | 0.00              | 0.020            | 8                 |                                                                                                                                                                                                                                                                             |  |  |  |                        |        |                                       |                      |                             |       |                       |       |                       |      |       |   |
| City, State                           | Greenwood, SC     |                  |                   |                                                                                                                                                                                                                                                                             |  |  |  |                        |        |                                       |                      |                             |       |                       |       |                       |      |       |   |
| Test Location                         | DHM               |                  |                   |                                                                                                                                                                                                                                                                             |  |  |  |                        |        |                                       |                      |                             |       |                       |       |                       |      |       |   |
| Date                                  | 12/4/18           |                  | Filter ID 1       | <table border="1"> <tr> <td></td> <td>A</td> <td>B</td> </tr> <tr> <td>Pitot Pre Leak Check</td> <td>4</td> <td>5</td> </tr> <tr> <td>Pitot Post Leak Check</td> <td>3</td> <td>7</td> </tr> </table>                                                                       |  |  |  |                        | A      | B                                     | Pitot Pre Leak Check | 4                           | 5     | Pitot Post Leak Check | 3     | 7                     |      |       |   |
|                                       | A                 | B                |                   |                                                                                                                                                                                                                                                                             |  |  |  |                        |        |                                       |                      |                             |       |                       |       |                       |      |       |   |
| Pitot Pre Leak Check                  | 4                 | 5                |                   |                                                                                                                                                                                                                                                                             |  |  |  |                        |        |                                       |                      |                             |       |                       |       |                       |      |       |   |
| Pitot Post Leak Check                 | 3                 | 7                |                   |                                                                                                                                                                                                                                                                             |  |  |  |                        |        |                                       |                      |                             |       |                       |       |                       |      |       |   |
| Start                                 | 9:15              |                  | Filter ID 2       |                                                                                                                                                                                                                                                                             |  |  |  |                        |        |                                       |                      |                             |       |                       |       |                       |      |       |   |
| Stop                                  | 10:23             |                  | Filter ID 3       |                                                                                                                                                                                                                                                                             |  |  |  |                        |        |                                       |                      |                             |       |                       |       |                       |      |       |   |
| Meterbox ID                           | 909033            | TH, JG, EC       | Operator*         | <table border="1"> <tr> <td>Ambient Temperature</td> <td>40</td> </tr> <tr> <td>Static Pressure, In. H<sub>2</sub>O</td> <td>-0.31</td> </tr> <tr> <td>Barometric Pressure, In. Hg</td> <td>29.97</td> </tr> </table>                                                       |  |  |  | Ambient Temperature    | 40     | Static Pressure, In. H <sub>2</sub> O | -0.31                | Barometric Pressure, In. Hg | 29.97 |                       |       |                       |      |       |   |
| Ambient Temperature                   | 40                |                  |                   |                                                                                                                                                                                                                                                                             |  |  |  |                        |        |                                       |                      |                             |       |                       |       |                       |      |       |   |
| Static Pressure, In. H <sub>2</sub> O | -0.31             |                  |                   |                                                                                                                                                                                                                                                                             |  |  |  |                        |        |                                       |                      |                             |       |                       |       |                       |      |       |   |
| Barometric Pressure, In. Hg           | 29.97             |                  |                   |                                                                                                                                                                                                                                                                             |  |  |  |                        |        |                                       |                      |                             |       |                       |       |                       |      |       |   |
| ΔH@                                   | 1.898             |                  | Stack TC ID       |                                                                                                                                                                                                                                                                             |  |  |  |                        |        |                                       |                      |                             |       |                       |       |                       |      |       |   |
| Gamma (Y)                             | 0.9744            |                  | Tedlar Bags       |                                                                                                                                                                                                                                                                             |  |  |  |                        |        |                                       |                      |                             |       |                       |       |                       |      |       |   |
| Ideal Nozzle                          | 0.201             |                  | Orsat Pump        |                                                                                                                                                                                                                                                                             |  |  |  |                        |        |                                       |                      |                             |       |                       |       |                       |      |       |   |
| Nozzle Dia.                           | 0.206             |                  | Probe Length/Type |                                                                                                                                                                                                                                                                             |  |  |  |                        |        |                                       |                      |                             |       |                       |       |                       |      |       |   |
| Nozzle ID                             | M11               | 1.72             | K Factor          | <b>ACTUAL MOISTURE &amp; GAS COMPOSITION</b> <table border="1"> <tr> <td>Water Recovered, grams</td> <td>35.7</td> <td>Moisture, %</td> <td>3.94</td> </tr> <tr> <td>CO<sub>2</sub> %</td> <td>0.12</td> <td>O<sub>2</sub> %</td> <td>20.95</td> </tr> </table>             |  |  |  | Water Recovered, grams | 35.7   | Moisture, %                           | 3.94                 | CO <sub>2</sub> %           | 0.12  | O <sub>2</sub> %      | 20.95 |                       |      |       |   |
| Water Recovered, grams                | 35.7              | Moisture, %      | 3.94              |                                                                                                                                                                                                                                                                             |  |  |  |                        |        |                                       |                      |                             |       |                       |       |                       |      |       |   |
| CO <sub>2</sub> %                     | 0.12              | O <sub>2</sub> % | 20.95             |                                                                                                                                                                                                                                                                             |  |  |  |                        |        |                                       |                      |                             |       |                       |       |                       |      |       |   |
| Probe ID                              | 3A                |                  | Umbilic ID        |                                                                                                                                                                                                                                                                             |  |  |  |                        |        |                                       |                      |                             |       |                       |       |                       |      |       |   |

**Sampling Information**

| Point | Time Per Pt. (Min.) | Elapsed Time (h:m:s) | Dry Gas Meter (cu.ft.) | Velocity ΔP (In H <sub>2</sub> O) | Meter Temp (°F) | Stack Temp (°F) | Actual ΔH (in H <sub>2</sub> O) | Probe Temp (°F) | Filter Temp (°F) | Exit Temp (°F) | CPM Temp (°F) | Pump Vac (in. Hg) | Target ΔH (in H <sub>2</sub> O) | Run ISO % Pt | Run ISO % Cum | Lk √ During Run |
|-------|---------------------|----------------------|------------------------|-----------------------------------|-----------------|-----------------|---------------------------------|-----------------|------------------|----------------|---------------|-------------------|---------------------------------|--------------|---------------|-----------------|
| 1     | 2.5                 | 0                    | 183.434                | 0.87                              | 60              | 99              | 1.5                             | 261             | 235              | 34             | 69            | 3                 | 1.545                           | 103.3        | 103.3         | LC 1            |
| 2     | 2.5                 | 2:30                 | 185.21                 | 0.88                              | 60              | 100             | 1.6                             | 255             | 245              | 41             | 74            | 3                 | 1.560                           | 94.3         | 98.8          |                 |
| 3     | 2.5                 | 5:0                  | 186.84                 | 0.95                              | 60              | 98              | 1.7                             | 261             | 259              | 41             | 73            | 3                 | 1.690                           | 100.7        | 99.4          |                 |
| 4     | 2.5                 | 7:30                 | 188.65                 | 0.96                              | 60              | 100             | 1.7                             | 261             | 256              | 42             | 73            | 3.5               | 1.701                           | 103.1        | 100.4         | LC-2            |
| 5     | 2.5                 | 10:0                 | 190.51                 | 0.9                               | 61              | 102             | 1.6                             | 260             | 255              | 44             | 72            | 3                 | 1.592                           | 97.8         | 99.9          |                 |
| 6     | 2.5                 | 12:30                | 192.22                 | 0.6                               | 61              | 99              | 1.1                             | 260             | 259              | 46             | 72            | 2                 | 1.067                           | 109.7        | 101.2         |                 |
| 1     | 2.5                 | 15:0                 | 193.791                | 0.97                              | 61              | 99              | 1.7                             | 255             | 254              | 47             | 71            | 3                 | 1.728                           | 102.8        | 101.5         | LC-3            |
| 2     | 2.5                 | 17:30                | 195.66                 | 0.9                               | 65              | 99              | 1.6                             | 257             | 255              | 49             | 71            | 3                 | 1.613                           | 99.7         | 101.2         |                 |
| 3     | 2.5                 | 20:0                 | 197.42                 | 0.95                              | 67              | 102             | 1.7                             | 257             | 251              | 50             | 71            | 3                 | 1.700                           | 100.8        | 101.2         |                 |
| 4     | 2.5                 | 22:30                | 199.25                 | 0.85                              | 65              | 104             | 1.5                             | 255             | 256              | 50             | 74            | 3                 | 1.510                           | 108.4        | 101.9         | LC-4            |
| 5     | 2.5                 | 25:0                 | 201.103                | 0.78                              | 65              | 101             | 1.4                             | 260             | 259              | 49             | 75            | 3                 | 1.394                           | 100.3        | 101.8         |                 |
| 6     | 2.5                 | 27:30                | 202.75                 | 0.56                              | 65              | 94              | 1                               | 259             | 254              | 46             | 75            | 2.5               | 1.013                           | 108.4        | 102.2         |                 |
| 1     | 2.5                 | 30:0                 | 204.269                | 0.99                              | 65              | 97              | 1.8                             | 260             | 254              | 44             | 75            | 3.5               | 1.784                           | 95.5         | 101.6         | LC-5            |
| 2     | 2.5                 | 32:30                | 206.04                 | 0.92                              | 65              | 100             | 1.6                             | 260             | 253              | 43             | 74            | 3                 | 1.645                           | 101.5        | 101.6         |                 |
| 3     | 2.5                 | 35:0                 | 207.85                 | 0.9                               | 65              | 102             | 1.6                             | 255             | 254              | 43             | 74            | 3                 | 1.605                           | 100.5        | 101.6         |                 |
| 4     | 2.5                 | 37:30                | 209.62                 | 0.82                              | 65              | 104             | 1.5                             | 255             | 256              | 44             | 72            | 3                 | 1.457                           | 106.6        | 101.9         | LC-6            |
| 5     | 2.5                 | 40:0                 | 211.41                 | 0.7                               | 65              | 105             | 1.2                             | 255             | 254              | 45             | 75            | 2.5               | 1.242                           | 106.4        | 102.1         |                 |
| 6     | 2.5                 | 42:30                | 213.06                 | 0.57                              | 65              | 106             | 1                               | 260             | 257              | 45             | 74            | 2.5               | 1.010                           | 103.7        | 102.2         |                 |
| 1     | 2.5                 | 45:0                 | 214.511                | 0.9                               | 65              | 106             | 1.6                             | 260             | 256              | 46             | 75            | 3                 | 1.596                           | 102.5        | 102.2         | LC-7            |
| 2     | 2.5                 | 47:30                | 216.31                 | 0.92                              | 65              | 106             | 1.6                             | 255             | 256              | 44             | 73            | 3                 | 1.629                           | 95.8         | 101.9         |                 |
| 3     | 2.5                 | 50:0                 | 218.01                 | 0.95                              | 68              | 105             | 1.7                             | 256             | 255              | 45             | 72            | 3                 | 1.695                           | 100.9        | 101.8         |                 |
| 4     | 2.5                 | 52:30                | 219.84                 | 0.98                              | 68              | 106             | 1.7                             | 256             | 255              | 46             | 72            | 3                 | 1.745                           | 93.4         | 101.4         | LC-8            |
| 5     | 2.5                 | 55:0                 | 221.56                 | 0.95                              | 67              | 107             | 1.7                             | 255             | 257              | 45             | 72            | 3                 | 1.685                           | 92.4         | 101.0         |                 |
| 6     | 2.5                 | 57:30                | 223.23                 | 0.82                              | 67              | 107             | 1.5                             | 255             | 256              | 45             | 72            | 3                 | 1.454                           | 103.6        | 101.1         |                 |
|       |                     | 1:00:0               | 224.971                |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |

| Total        | Averages             |      |       |                     |     | Maximum and Minimum Values |    |    |   |  |
|--------------|----------------------|------|-------|---------------------|-----|----------------------------|----|----|---|--|
| Vm 41.537    | 0.853                | 64.2 | 102.0 | 1.525               | 261 | 259                        | 50 | 75 | 4 |  |
| Vmstd 40.991 | in. H <sub>2</sub> O | °F   | °F    | in H <sub>2</sub> O | 255 | 235                        | 34 | 69 |   |  |

| Run ISO |
|---------|
| 101.1   |
| %       |

Run Notes:

---



---



---

**Air Control Techniques, P.C.**  
**Isokinetic Sampling Train Field Data Sheet**

|              |               |                 |
|--------------|---------------|-----------------|
| <b>Job #</b> | <b>Run ID</b> | <b>M5/202-2</b> |
| 2333         | <b>Method</b> | 5/202           |

| IDENTIFICATION INFORMATION |                   |            |                   | PRELIMINARY CHECKS AND DATA                                                                                                                                                 |  |  |  |
|----------------------------|-------------------|------------|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|
| Plant                      | Enviva, Greenwood |            |                   | Actual      Req'd      Vacuum<br>Pre Leak Check, ACFM      0.00      <0.02 or 4%      7<br>Post Leak Check, ACFM      0.00      0.020      9                                |  |  |  |
| City, State                | Greenwood, SC     |            |                   |                                                                                                                                                                             |  |  |  |
| Test Location              | DHM               |            |                   |                                                                                                                                                                             |  |  |  |
| Date                       | 12/4/18           |            | Filter ID 1       |                                                                                                                                                                             |  |  |  |
| Start                      | 11:17             |            | Filter ID 2       |                                                                                                                                                                             |  |  |  |
| Stop                       | 12:25             |            | Filter ID 3       |                                                                                                                                                                             |  |  |  |
| Meterbox ID                | 909033            | TH, JG, EC | Personnel         |                                                                                                                                                                             |  |  |  |
| ΔH <sub>0</sub>            | 1.898             | 3B         | Stack TC ID       |                                                                                                                                                                             |  |  |  |
| Gamma (Y)                  | 0.9744            |            | Tedlar Bags       |                                                                                                                                                                             |  |  |  |
| Ideal Nozzle               | 0.213             |            | Orsat Pump        |                                                                                                                                                                             |  |  |  |
| Nozzle Dia.                | 0.206             |            | Probe Length/Type |                                                                                                                                                                             |  |  |  |
| Nozzle ID                  | M12               | 1.78       | K Factor          |                                                                                                                                                                             |  |  |  |
| Probe ID                   | 3B                | 0          | Umbilicle ID      |                                                                                                                                                                             |  |  |  |
|                            |                   |            |                   | <b>ACTUAL MOISTURE &amp; GAS COMPOSITION</b><br>Water Recovered, grams      39.7      Moisture, %      4.22<br>CO <sub>2</sub> %      0.12      O <sub>2</sub> %      20.95 |  |  |  |

| Sampling Information |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|----------------------|---------------------|----------------------|------------------------|-----------------------------------|-----------------|-----------------|---------------------------------|-----------------|------------------|----------------|---------------|-------------------|---------------------------------|--------------|-----------------|
| Point                | Time Per Pt. (Min.) | Elapsed Time (h:m:s) | Dry Gas Meter (cu.ft.) | Velocity ΔP (In H <sub>2</sub> O) | Meter Temp (°F) | Stack Temp (°F) | Actual ΔH (in H <sub>2</sub> O) | Probe Temp (°F) | Filter Temp (°F) | Exit Temp (°F) | CPM Temp (°F) | Pump Vac (in. Hg) | Target ΔH (in H <sub>2</sub> O) | Run ISO % Pt | Lk √ During Run |
| 1                    | 2.5                 | 0                    | 225.602                | 0.99                              | 65              | 100             | 1.8                             | 261             | 254              | 54             | 71            | 3.5               | 1.774                           | 102.1        | LC 1            |
| 2                    | 2.5                 | 2:30                 | 227.49                 | 1.2                               | 65              | 100             | 2.1                             | 261             | 258              | 48             | 69            | 4.5               | 2.148                           | 93.4         |                 |
| 3                    | 2.5                 | 5:0                  | 229.39                 | 1.2                               | 65              | 103             | 2.1                             | 260             | 256              | 46             | 69            | 4.5               | 2.135                           | 103.0        |                 |
| 4                    | 2.5                 | 7:30                 | 231.48                 | 1.4                               | 65              | 109             | 2.5                             | 262             | 256              | 46             | 69            | 4.5               | 2.465                           | 93.2         | LC-2            |
| 5                    | 2.5                 | 10:0                 | 233.51                 | 1.1                               | 65              | 106             | 1.9                             | 261             | 257              | 49             | 72            | 4.5               | 1.945                           | 101.6        |                 |
| 6                    | 2.5                 | 12:30                | 235.48                 | 1.2                               | 66              | 107             | 2.1                             | 261             | 256              | 49             | 73            | 4.5               | 2.125                           | 102.1        |                 |
| 1                    | 2.5                 | 15:0                 | 237.549                | 1.1                               | 68              | 106             | 2                               | 262             | 257              | 50             | 73            | 4.5               | 1.958                           | 103.2        | LC-3            |
| 2                    | 2.5                 | 17:30                | 239.56                 | 1                                 | 68              | 109             | 1.8                             | 260             | 256              | 50             | 73            | 4.5               | 1.771                           | 99.7         |                 |
| 3                    | 2.5                 | 20:0                 | 241.41                 | 1.1                               | 69              | 110             | 1.9                             | 258             | 256              | 50             | 73            | 4.5               | 1.949                           | 108.4        |                 |
| 4                    | 2.5                 | 22:30                | 243.52                 | 1                                 | 70              | 110             | 1.8                             | 238             | 257              | 51             | 70            | 4                 | 1.775                           | 100.0        | LC-4            |
| 5                    | 2.5                 | 25:0                 | 245.38                 | 0.97                              | 70              | 110             | 1.7                             | 256             | 258              | 51             | 71            | 4                 | 1.722                           | 96.0         |                 |
| 6                    | 2.5                 | 27:30                | 247.14                 | 0.7                               | 71              | 109             | 1.2                             | 261             | 253              | 51             | 71            | 4                 | 1.248                           | 107.9        |                 |
| 1                    | 2.5                 | 30:0                 | 248.826                | 0.86                              | 71              | 108             | 1.5                             | 254             | 257              | 51             | 70            | 3.5               | 1.538                           | 104.7        | LC-5            |
| 2                    | 2.5                 | 32:30                | 250.64                 | 0.82                              | 71              | 111             | 1.5                             | 261             | 257              | 50             | 70            | 3.5               | 1.457                           | 104.9        |                 |
| 3                    | 2.5                 | 35:0                 | 252.41                 | 0.78                              | 72              | 111             | 1.4                             | 262             | 254              | 51             | 69            | 3.5               | 1.389                           | 104.3        |                 |
| 4                    | 2.5                 | 37:30                | 254.13                 | 0.71                              | 72              | 111             | 1.3                             | 262             | 257              | 50             | 69            | 3                 | 1.264                           | 99.1         | LC-6            |
| 5                    | 2.5                 | 40:0                 | 255.69                 | 0.7                               | 72              | 111             | 1.3                             | 262             | 251              | 51             | 69            | 3                 | 1.247                           | 99.8         |                 |
| 6                    | 2.5                 | 42:30                | 257.25                 | 0.55                              | 72              | 106             | 0.99                            | 262             | 254              | 50             | 73            | 3                 | 0.988                           | 100.0        |                 |
| 1                    | 2.5                 | 45:0                 | 258.642                | 0.95                              | 72              | 110             | 1.7                             | 255             | 256              | 50             | 70            | 4                 | 1.697                           | 101.0        | LC-7            |
| 2                    | 2.5                 | 47:30                | 260.48                 | 0.92                              | 72              | 112             | 1.6                             | 264             | 253              | 48             | 72            | 4                 | 1.634                           | 95.0         |                 |
| 3                    | 2.5                 | 50:0                 | 262.18                 | 0.94                              | 72              | 111             | 1.7                             | 261             | 254              | 49             | 72            | 4.5               | 1.673                           | 109.4        |                 |
| 4                    | 2.5                 | 52:30                | 264.16                 | 0.92                              | 72              | 111             | 1.6                             | 249             | 255              | 49             | 72            | 4                 | 1.637                           | 98.3         | LC-8            |
| 5                    | 2.5                 | 55:0                 | 265.92                 | 0.83                              | 72              | 112             | 1.5                             | 256             | 254              | 49             | 72            | 4                 | 1.475                           | 96.5         |                 |
| 6                    | 2.5                 | 57:30                | 267.56                 | 0.67                              | 72              | 111             | 1.2                             | 254             | 247              | 48             | 72            | 3.5               | 1.193                           | 99.5         |                 |
|                      |                     | 1:00:0               | 269.081                |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |

| Total        | Averages             |      |       |                     |     | Maximum and Minimum Values |    |    |   |  | Run ISO |
|--------------|----------------------|------|-------|---------------------|-----|----------------------------|----|----|---|--|---------|
| Vm 43.479    | 0.931                | 69.5 | 108.5 | 1.675               | 264 | 258                        | 54 | 73 | 5 |  | 101.1   |
| Vmstd 42.487 | in. H <sub>2</sub> O | °F   | °F    | in H <sub>2</sub> O | 238 | 247                        | 46 | 69 |   |  | %       |

**Run Notes:** \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**Air Control Techniques, P.C.**  
**Isokinetic Sampling Train Field Data Sheet**

|              |               |                 |
|--------------|---------------|-----------------|
| <b>Job #</b> | <b>Run ID</b> | <b>M5/202-3</b> |
| 2333         | <b>Method</b> | 5/202           |

| IDENTIFICATION INFORMATION        |                   |                  |                   | PRELIMINARY CHECKS AND DATA                                                                                                                                                                                                                                                                                                |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
|-----------------------------------|-------------------|------------------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-------------|--------|-----------------------------------|--|--|--|------------------------|------|-------------|------|-------------------|------|------------------|-------|
| Plant                             | Enviva, Greenwood |                  |                   | Pre Leak Check, ACFM                                                                                                                                                                                                                                                                                                       | Actual                | Req'd       | Vacuum |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| City, State                       | Greenwood, SC     |                  |                   |                                                                                                                                                                                                                                                                                                                            | 0.00                  | <0.02 or 4% | 9      |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Test Location                     | DHM               |                  |                   |                                                                                                                                                                                                                                                                                                                            | Post Leak Check, ACFM | 0.00        | 0.020  | 11                                |  |  |  |                        |      |             |      |                   |      |                  |       |
| Date                              | 12/4/18           |                  | Filter ID 1       |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Start                             | 13:04             |                  | Filter ID 2       |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Stop                              | 14:12             |                  | Filter ID 3       |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Meterbox ID                       | 909033            | TH, JG, EC       | Personnel         |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| ΔH <sub>0</sub>                   | 1.898             | 3A               | Stack TC ID       |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Gamma (Y)                         | 0.9744            |                  | Tedlar Bags       |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Ideal Nozzle                      | 0.208             |                  | Orsat Pump        |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Nozzle Dia.                       | 0.206             |                  | Probe Length/Type |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Nozzle ID                         | M11               | 1.77             | K Factor          |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Probe ID                          | 3A                | 0                | Umbilicle ID      |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
|                                   |                   |                  |                   | <table border="1"> <thead> <tr> <th colspan="4">ACTUAL MOISTURE &amp; GAS COMPOSITION</th> </tr> </thead> <tbody> <tr> <td>Water Recovered, grams</td> <td>41.3</td> <td>Moisture, %</td> <td>4.33</td> </tr> <tr> <td>CO<sub>2</sub> %</td> <td>0.11</td> <td>O<sub>2</sub> %</td> <td>20.91</td> </tr> </tbody> </table> |                       |             |        | ACTUAL MOISTURE & GAS COMPOSITION |  |  |  | Water Recovered, grams | 41.3 | Moisture, % | 4.33 | CO <sub>2</sub> % | 0.11 | O <sub>2</sub> % | 20.91 |
| ACTUAL MOISTURE & GAS COMPOSITION |                   |                  |                   |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Water Recovered, grams            | 41.3              | Moisture, %      | 4.33              |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| CO <sub>2</sub> %                 | 0.11              | O <sub>2</sub> % | 20.91             |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |

| Sampling Information |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|----------------------|---------------------|----------------------|------------------------|-----------------------------------|-----------------|-----------------|---------------------------------|-----------------|------------------|----------------|---------------|-------------------|---------------------------------|--------------|-----------------|
| Point                | Time Per Pt. (Min.) | Elapsed Time (h:m:s) | Dry Gas Meter (cu.ft.) | Velocity ΔP (in H <sub>2</sub> O) | Meter Temp (°F) | Stack Temp (°F) | Actual ΔH (in H <sub>2</sub> O) | Probe Temp (°F) | Filter Temp (°F) | Exit Temp (°F) | CPM Temp (°F) | Pump Vac (in. Hg) | Target ΔH (in H <sub>2</sub> O) | Run ISO % Pt | Lk √ During Run |
| 1                    | 2.5                 | 0                    | 269.967                | 1                                 | 68              | 103             | 1.8                             | 252             | 257              | 52             | 73            | 3                 | 1.784                           | 100.7        | LC 1            |
| 2                    | 2.5                 | 2:30                 | 271.84                 | 1.1                               | 68              | 100             | 2                               | 259             | 252              | 44             | 71            | 3.5               | 1.971                           | 94.6         |                 |
| 3                    | 2.5                 | 5:0                  | 273.69                 | 1.3                               | 68              | 101             | 2.3                             | 260             | 261              | 46             | 71            | 4                 | 2.324                           | 103.2        |                 |
| 4                    | 2.5                 | 7:30                 | 275.88                 | 1.1                               | 69              | 103             | 2                               | 261             | 257              | 50             | 73            | 4                 | 1.962                           | 107.0        | LC-2            |
| 5                    | 2.5                 | 10:0                 | 277.97                 | 0.98                              | 69              | 104             | 1.7                             | 261             | 257              | 51             | 75            | 3.5               | 1.746                           | 96.5         |                 |
| 6                    | 2.5                 | 12:30                | 279.75                 | 0.9                               | 69              | 105             | 1.6                             | 261             | 256              | 52             | 76            | 3                 | 1.602                           | 98.9         |                 |
| 1                    | 2.5                 | 15:0                 | 281.497                | 0.92                              | 71              | 107             | 1.6                             | 261             | 257              | 51             | 75            | 3                 | 1.638                           | 95.2         | LC-3            |
| 2                    | 2.5                 | 17:30                | 283.2                  | 0.85                              | 71              | 106             | 1.8                             | 259             | 256              | 51             | 73            | 3.5               | 1.516                           | 104.1        |                 |
| 3                    | 2.5                 | 20:0                 | 284.99                 | 0.8                               | 72              | 106             | 1.5                             | 258             | 255              | 50             | 72            | 3                 | 1.429                           | 108.2        |                 |
| 4                    | 2.5                 | 22:30                | 286.8                  | 0.77                              | 73              | 106             | 1.4                             | 259             | 256              | 50             | 72            | 3                 | 1.379                           | 102.7        | LC-4            |
| 5                    | 2.5                 | 25:0                 | 288.49                 | 0.74                              | 73              | 106             | 1.4                             | 259             | 256              | 50             | 72            | 3                 | 1.326                           | 102.9        |                 |
| 6                    | 2.5                 | 27:30                | 290.15                 | 0.64                              | 73              | 107             | 1.2                             | 258             | 254              | 50             | 72            | 2.75              | 1.145                           | 103.9        |                 |
| 1                    | 2.5                 | 30:0                 | 291.707                | 1.05                              | 75              | 107             | 1.9                             | 261             | 256              | 50             | 74            | 3.5               | 1.886                           | 94.7         | LC-5            |
| 2                    | 2.5                 | 32:30                | 293.53                 | 1.05                              | 74              | 109             | 2                               | 261             | 257              | 48             | 76            | 4                 | 1.872                           | 103.8        |                 |
| 3                    | 2.5                 | 35:0                 | 295.52                 | 0.97                              | 75              | 109             | 1.9                             | 261             | 257              | 49             | 78            | 3.75              | 1.733                           | 107.2        |                 |
| 4                    | 2.5                 | 37:30                | 297.5                  | 0.92                              | 75              | 110             | 1.7                             | 262             | 256              | 49             | 78            | 3.5               | 1.641                           | 102.4        | LC-6            |
| 5                    | 2.5                 | 40:0                 | 299.34                 | 0.86                              | 76              | 110             | 1.6                             | 261             | 257              | 50             | 78            | 3.25              | 1.537                           | 105.7        |                 |
| 6                    | 2.5                 | 42:30                | 301.18                 | 0.69                              | 77              | 109             | 1.25                            | 260             | 257              | 50             | 79            | 3                 | 1.238                           | 100.5        |                 |
| 1                    | 2.5                 | 45:0                 | 302.754                | 1                                 | 78              | 110             | 1.8                             | 260             | 257              | 52             | 76            | 3.5               | 1.796                           | 101.7        | LC-7            |
| 2                    | 2.5                 | 47:30                | 304.67                 | 1.15                              | 78              | 111             | 2                               | 261             | 257              | 51             | 77            | 3                 | 2.059                           | 91.2         |                 |
| 3                    | 2.5                 | 50:0                 | 306.51                 | 1.1                               | 79              | 111             | 1.95                            | 260             | 257              | 51.5           | 78            | 4                 | 1.973                           | 100.4        |                 |
| 4                    | 2.5                 | 52:30                | 308.495                | 1.05                              | 79              | 111             | 1.9                             | 260             | 257              | 52             | 78            | 4                 | 1.883                           | 102.2        | LC-8            |
| 5                    | 2.5                 | 55:0                 | 310.47                 | 1                                 | 79              | 110             | 1.8                             | 259             | 257              | 53             | 78            | 4                 | 1.797                           | 107.6        |                 |
| 6                    | 2.5                 | 57:30                | 312.5                  | 0.83                              | 80              | 110             | 1.5                             | 259             | 256              | 53             | 78            | 3                 | 1.495                           | 104.4        |                 |
|                      | 2.5                 | 1:00:0               | 314.3                  |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |

|                   | Total  | Averages             |      |       |                     |     | Maximum and Minimum Values |    |    |   |  | Run ISO |  |
|-------------------|--------|----------------------|------|-------|---------------------|-----|----------------------------|----|----|---|--|---------|--|
| V <sub>m</sub>    | 44.333 | 0.942                | 73.7 | 107.1 | 1.733               | 262 | 261                        | 53 | 79 | 4 |  | 101.6   |  |
| V <sub>mstd</sub> | 42.990 | in. H <sub>2</sub> O | °F   | °F    | in H <sub>2</sub> O | 252 | 252                        | 44 | 71 |   |  | %       |  |

Run Notes:

---



---



---



**Method 4 - Air Control Techniques, P.C.**

Date 12/4/2018

**Source Information**

|                   |                   |           |             |
|-------------------|-------------------|-----------|-------------|
| Plant Name        | Enviva, Greenwood | Job #     | 2333        |
| City, State       | Greenwood, SC     | Personnel | TTB, JG, EG |
| Sampling Location | DHM               | Balance   |             |

**Sampling Information**

|                       |           |           |           |  |
|-----------------------|-----------|-----------|-----------|--|
| Run Number            | M5/202-1  | M5/202-2  | M5/202-3  |  |
| Filter Identification | 14650     | 14651     | 14652     |  |
| Sampling Date         | 12/4/2018 | 12/4/2018 | 12/4/2018 |  |

**Moisture Data**Impinger 1 - Empty

|                        |       |       |       |  |
|------------------------|-------|-------|-------|--|
| Final Weight, grams    | 412.9 | 408.3 | 411.2 |  |
| Initial Weight, grams  | 398.5 | 396.6 | 399.3 |  |
| Condensed Water, grams | 14.4  | 11.7  | 11.9  |  |

Impinger 2 - Empty

|                        |       |       |       |  |
|------------------------|-------|-------|-------|--|
| Final Weight, grams    | 595.1 | 546.2 | 596.0 |  |
| Initial Weight, grams  | 590.8 | 540.5 | 592.5 |  |
| Condensed Water, grams | 4.3   | 5.7   | 3.5   |  |

Impinger 3

|                        |       |       |       |  |
|------------------------|-------|-------|-------|--|
| Final Weight, grams    | 748.2 | 688.2 | 760.4 |  |
| Initial Weight, grams  | 740.9 | 677.6 | 748.2 |  |
| Condensed Water, grams | 7.3   | 10.6  | 12.2  |  |

Silica Gel

|                       |       |       |       |  |
|-----------------------|-------|-------|-------|--|
| Final Weight, grams   | 815.9 | 820.6 | 829.6 |  |
| Initial Weight, grams | 806.2 | 808.9 | 815.9 |  |
| Adsorbed Water, grams | 9.7   | 11.7  | 13.7  |  |

|                    |             |             |             |  |
|--------------------|-------------|-------------|-------------|--|
| Total Water, grams | <b>35.7</b> | <b>39.7</b> | <b>41.3</b> |  |
|--------------------|-------------|-------------|-------------|--|

**Sampling Train Purge Data**

|             |      |      |      |  |
|-------------|------|------|------|--|
| Purge Start | 1035 | 1240 | 1430 |  |
| Purge End   | 1135 | 1341 | 1530 |  |

**Plant Name** Enviva, Greenwood  
**City, State** Greenwood, SC

**Project #** 2333  
**Test Location** DHM

| Parameter                                       | Nomenclature/<br>Units        | M5/202-1  | M5/202-2  | M5/202-3  | Averages |
|-------------------------------------------------|-------------------------------|-----------|-----------|-----------|----------|
| Date                                            |                               | 12/4/2018 | 12/4/2018 | 12/4/2018 |          |
| Run Time                                        | θ, minutes                    | 60.0      | 60.0      | 60.0      |          |
| Nozzle Diameter                                 | inches                        | 0.206     | 0.206     | 0.206     |          |
| Stack Area                                      | As - sq. ft.                  | 21.3      | 21.3      | 21.3      |          |
| Production Rate                                 | ODT/hour                      | 65.4      | 64.9      | 64.6      | 65.0     |
| Pitot Tube Coefficient                          | Cp                            | 0.84      | 0.84      | 0.84      |          |
| Meter Calibration Factor                        | Y                             | 0.9744    | 0.9744    | 0.9744    |          |
| Barometric Pressure, inches Hg                  | Bp - in. Hg                   | 29.97     | 29.97     | 29.97     |          |
| Static Pressure                                 | Pg - in. H <sub>2</sub> O     | -0.31     | -0.31     | -0.31     |          |
| Stack Pressure                                  | Ps - in. Hg                   | 29.95     | 29.95     | 29.95     |          |
| Meter Box Pressure Differential                 | Δ H - in. H <sub>2</sub> O    | 1.53      | 1.67      | 1.73      |          |
| Average Velocity Head                           | Δ P - in. H <sub>2</sub> O    | 0.8528    | 0.9314    | 0.9424    |          |
| Volume of Gas Sampled                           | V <sub>m</sub> - cu. ft.      | 41.537    | 43.479    | 44.333    |          |
| Dry Gas Meter Temperature                       | T <sub>m</sub> - °F           | 64.2      | 69.5      | 73.7      |          |
| Stack Temperature                               | T <sub>s</sub> - °F           | 102.0     | 108.5     | 107.1     | 105.9    |
| Stack Temperature                               | T <sub>s</sub> - °C           | 38.9      | 42.5      | 41.7      |          |
| Liquid Collected                                | grams                         | 35.7      | 39.7      | 41.3      |          |
| Oxygen                                          | O <sub>2</sub> %              | 20.95     | 20.95     | 20.91     | 20.94    |
| Carbon Dioxide                                  | CO <sub>2</sub> %             | 0.12      | 0.12      | 0.11      | 0.12     |
| Nitrogen                                        | N <sub>2</sub> %              | 78.93     | 78.93     | 78.99     |          |
| Volume of Gas Sampled, Dry                      | V <sub>m(std)</sub> - cu. ft. | 40.991    | 42.487    | 42.990    | 42.156   |
| Volume of Gas Sampled, Dry                      | V <sub>m(std)</sub> - cu. M   | 1.161     | 1.203     | 1.217     |          |
| Volume of Gas Sampled, Dry                      | V <sub>m(std)</sub> - N cu. M | 1.081     | 1.120     | 1.134     |          |
| Volume of Water Vapor                           | V <sub>w(std)</sub> - cu. ft. | 1.683     | 1.872     | 1.947     |          |
| Moisture Content                                | % H <sub>2</sub> O            | 3.94      | 4.22      | 4.33      | 4.17     |
| Saturation Moisture                             | % H <sub>2</sub> O            | 6.85      | 8.29      | 7.97      |          |
| Dry Mole Fraction                               | M <sub>fd</sub>               | 0.961     | 0.958     | 0.957     |          |
| Gas Molecular Weight, Dry                       | M <sub>d</sub>                | 28.86     | 28.86     | 28.85     |          |
| Gas Molecular Weight, Wet                       | M <sub>s</sub>                | 28.43     | 28.40     | 28.38     |          |
| Gas Velocity                                    | vs - ft./sec.                 | 53.88     | 56.66     | 56.94     | 55.83    |
| Gas Velocity                                    | m/sec.                        | 16.42     | 17.27     | 17.36     |          |
| Volumetric Air Flow, Actual                     | Q <sub>aw</sub> - ACFM        | 68,874    | 72,432    | 72,790    | 71,365   |
| Volumetric Air Flow, Actual                     | m <sup>3</sup> /min           | 1,950     | 2,051     | 2,061     |          |
| Volumetric Air Flow, Standard                   | Q <sub>sd</sub> - DSCFM       | 62,212    | 64,491    | 64,891    | 63,865   |
| Volumetric Air Flow, Standard                   | Nm <sup>3</sup> /min          | 1,640     | 1,701     | 1,711     |          |
| Isokinetic Sampling Rate                        | I %                           | 101.1     | 101.1     | 101.6     |          |
| <b>FILTERABLE PARTICULATE MATTER EMISSIONS</b>  |                               |           |           |           |          |
| Filterable Particulate Catch                    | mg                            | 48.2      | 47.4      | 34.8      |          |
| Concentration                                   | gr/DSCF                       | 0.0181    | 0.0172    | 0.0125    | 0.0160   |
| Mass Emission Rate                              | lb/hr                         | 9.7       | 9.5       | 6.9       | 8.7      |
| Mass Emission Rate                              | lbs/ODT                       | 0.15      | 0.15      | 0.11      | 0.13     |
| <b>CONDENSABLE PARTICULATE MATTER EMISSIONS</b> |                               |           |           |           |          |
| Condensable Particulate Catch                   | mg                            | 0.7       | 0.4       | 1.9       |          |
| Concentration                                   | gr/DSCF                       | 0.0003    | 0.0001    | 0.0007    | 0.0004   |
| Mass Emission Rate                              | lb/hr                         | 0.14      | 0.08      | 0.38      | 0.20     |
| Mass Emission Rate                              | lbs/ODT                       | 0.0021    | 0.0012    | 0.0059    | 0.0031   |
| <b>TOTAL PARTICULATE MATTER EMISSIONS</b>       |                               |           |           |           |          |
| Mass Emission Rate                              | lb/hr                         | 9.8       | 9.6       | 7.3       | 8.9      |
| Mass Emission Rate                              | lbs/ODT                       | 0.15      | 0.15      | 0.11      | 0.14     |

**APPENDIX I-B**  
**Method 5-Method 202 Laboratory Report**

# RESOLUTION ANALYTICS, INC.

Specialists in Air Emissions Analysis

## ANALYTICAL REPORT

CLIENT: AIR CONTROL TECHNIQUES, INC.

PROJECT: 2333

### ANALYTICAL SERVICES PROVIDED:

- FILTERABLE & CONDENSIBLE PARTICULATE MATTER  
(EPA METHOD 5/202)

#### Confirmation of Data Review:

The analytical data and results provided in this report have been checked thoroughly for accuracy, has been performed and validated in accordance with the approved methods, and relate only to the samples provided for this project report.

The results contained herein shall not be reproduced except in full, without written approval of Resolution Analytics.

Date of Review: December 16, 2018



J. Bruce Nemet  
Quality Assurance Officer

[www.resolutionanalytics.com](http://www.resolutionanalytics.com)  
208 Technology Park Lane, Ste 110, Fuquay-Varina, NC 27526

## Report Summary

| SAMPLE ID          | TOTAL FILTERABLE PARTICULATE |
|--------------------|------------------------------|
| Limit of Detection | 0.2 mg                       |
| Acetone Blank      | 0.0 mg (in 184 mls)          |
| S3-M5/202-1        | 48.2 mg                      |
| S3-M5/202-2        | 47.4 mg                      |
| S3-M5/202-3        | 34.8 mg                      |
| S1-M5/202-1        | 2.5 mg                       |
| S1-M5/202-2        | 1.4 mg                       |
| S1-M5/202-3        | 0.5 mg                       |

**RESOLUTION ANALYTICS, INC.**

Specialists in Air Emissions Analysis

Client: Air Control Techniques  
RFA #: 2333  
Method: M202

## Report Summary

| SAMPLE ID                 | Organic CPM | Inorganic CPM | Total CPM <sup>1</sup> |
|---------------------------|-------------|---------------|------------------------|
| Limit of Detection        | 0.1 mg      | 0.1 mg        | 0.2 mg                 |
| Acetone Blank             |             |               | 0.0 mg (in 184 ml)     |
| Hexane Blank              |             |               | 0.2 mg (in 154 ml)     |
| DI H <sub>2</sub> O Blank |             |               | 0.0 mg (in 200 ml)     |
| M5/202-PB                 | 1.1 mg      | 0.3 mg        | 1.4 mg                 |
| M5/202-FB                 | 1.6 mg      | 0.3 mg        | 1.9 mg                 |
| S3-M5/202-1               | 2.3 mg      | 0.3 mg        | 0.7 mg                 |
| S3-M5/202-2               | 1.8 mg      | 0.5 mg        | 0.4 mg                 |
| S3-M5/202-3               | 3.8 mg      | 0.0 mg        | 1.9 mg                 |
| S1-M5/202-1               | 7.3 mg      | 2.1 mg        | 7.5 mg                 |
| S1-M5/202-2               | 5.8 mg      | 2.1 mg        | 6.0 mg                 |
| S1-M5/202-3               | 5.1 mg      | 2.0 mg        | 5.2 mg                 |

<sup>1</sup> Total Condensable Particulate Matter (CPM) results have been Field Blank corrected up to a maximum of 2.0 mg.



**Chain of Custody / Transmittal**

**JOB #:** 2333 **PO# -** 8145-2333

**TO:** Resolution Analytics, Inc. Attn: Jeff Coppe33e (919) 346-5740

208 Technology Park Lane Suite 110

Fuquay Varina, North Carolina 27526

Samples sent by: Todd Brozell Date 12/7/18

| SAMPLE NUMBER         | COMPONENTS                                                                                                                                                                                                                      | ANALYSIS                           |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|
| S3-M5/202-1,2,3       | <ul style="list-style-type: none"> <li>M5 Filter</li> <li>F<sup>1</sup>/<sub>2</sub> Acetone Rinse</li> <li>B<sup>1</sup>/<sub>2</sub> Acetone/Hexane Rinse</li> <li>CPM Filter</li> <li>Impinger Catch and DI Rinse</li> </ul> | Total Particulate by Methods 5/202 |
| S1-M5/202-1,2,3       | <ul style="list-style-type: none"> <li>M5 Filter</li> <li>F<sup>1</sup>/<sub>2</sub> Acetone Rinse</li> <li>B<sup>1</sup>/<sub>2</sub> Acetone/Hexane Rinse</li> <li>CPM Filter</li> <li>Impinger Catch and DI Rinse</li> </ul> | Total Particulate by Methods 5/202 |
| M5/202-FB Field Blank | <ul style="list-style-type: none"> <li>B<sup>1</sup>/<sub>2</sub> Acetone/Hexane Rinse</li> <li>CPM Filter</li> <li>Impinger Catch and DI Rinse</li> </ul>                                                                      | Total Particulate by Methods 5/202 |
| M5/202-PB Proof Blank | <ul style="list-style-type: none"> <li>B<sup>1</sup>/<sub>2</sub> Acetone/Hexane Rinse</li> <li>CPM Filter</li> <li>Impinger Catch and DI Rinse</li> </ul>                                                                      | Total Particulate by Methods 5/202 |
| Blanks                | <ul style="list-style-type: none"> <li>Acetone Blank M5</li> <li>Hexane Blank M202</li> <li>DI H<sub>2</sub>O Blank M202</li> </ul>                                                                                             | Total Particulate by Methods 5/202 |

Five Day Turnaround

Relinquished by: Todd Brozell Date 12/7/18

Received by: Jeffrey S. Coppe33e Date 12/10/18





Client: Air Control Techniques  
RFA #: 2333  
Date Received: 12/10/18  
Date Analyzed: 12/10/18  
Analyst: JSC  
Analysis: EPA M5  
Analyte(s): Filterable PM

## Analytical Narrative

---

### Sample Matrix & Components:

Dry Filters, Front<sup>1</sup>/<sub>2</sub> Acetone Rinses, Acetone Blank

### Summary of Sample Prep:

The acetone rinses were transferred to pre-tared teflon "baggies" in a low humidity environment. The acetone rinses were evaporated then desiccated for 24 hours, after which time they were weighed daily every six hours until consecutive weights agreed within  $\pm 0.5$  mg. The filters were baked 2 to 3 hours at 105° C, cooled in a desiccator and weighed.

All weights were recorded to the nearest 0.1 mg and include filterable particulate catch only. The total catch reported for each run is a sum of the filter and rinse catches. The acetone blank catch has been subtracted from sample rinse catches in proportion with their respective volumes.

### Summary of Instrumentation:

Denver model Pinnacle Series analytical balance

**Analytical Detection Limit(s):** 0.1 mg per fraction

**Miscellaneous Comments Regarding Sample Analysis:** (Note unusual catch weights, interferences, odd sample behavior, and steps taken to confirm unusual results. Also note any deviations from standard analytical procedures, together with justification and possible affect on results. Specify samples when applicable.)

No modifications to EPA Method 5 analytical procedure were made. See data sheets for individual sample descriptions.

**PARTICULATE SAMPLING LABORATORY RESULTS**

|                                       |  |             |             |                    |             |             |             |
|---------------------------------------|--|-------------|-------------|--------------------|-------------|-------------|-------------|
| Client: <b>Air Control Techniques</b> |  |             |             | RFA #: <b>2333</b> |             |             |             |
| Method: EPA M5                        |  |             |             |                    |             |             |             |
| <b>Run Number</b>                     |  | S3-M5/202-1 |             | S3-M5/202-2        |             | S3-M5/202-3 |             |
| <b>Filter Container #</b>             |  |             |             |                    |             |             |             |
| <u>Date</u>                           |  | <u>Init</u> |             | <u>Date</u>        |             | <u>Date</u> |             |
| 12/12/18                              |  | JSC         | 0.5035      | 12/12/18           | 0.4937      | 12/12/18    | 0.4916      |
| Baggie Tare Wt., g.                   |  |             | 0.0000      |                    | 0.0000      |             | 0.0000      |
| Filter Tare Wt., g.                   |  | 83Q-14650   | 0.4782      | 83Q-14651          | 0.4715      | 83Q-14652   | 0.4760      |
| FILTER SAMPLE WT., g.                 |  |             | 0.0253      |                    | 0.0222      |             | 0.0156      |
|                                       |  |             |             |                    |             |             |             |
| <b>Front ½ Rinse Container #</b>      |  |             |             |                    |             |             |             |
| <u>Date</u>                           |  | <u>Init</u> | 776         | <u>Date</u>        | 3361        | <u>Date</u> | 3870        |
|                                       |  |             |             |                    |             |             |             |
| 12/14/18                              |  | JSC F       | 3.4933      | 12/14/18 F         | 3.8191      | 12/14/18 F  | 3.8565      |
| 12/13/18                              |  | JSC         | 3.4935      | 12/13/18           | 3.8193      | 12/13/18 F  | 3.8565      |
| Tare Wt., g.                          |  | ( 100 ml)   | 3.4704      | ( 100 ml)          | 3.7939      | ( 86 ml)    | 3.8373      |
| RINSE SAMPLE WT., g.                  |  |             | 0.0229      |                    | 0.0252      |             | 0.0192      |
|                                       |  |             |             |                    |             |             |             |
| <b>Filter Catch, mg.</b>              |  |             | <b>25.3</b> |                    | <b>22.2</b> |             | <b>15.6</b> |
| <b>Rinse Catch, mg.</b>               |  |             | <b>22.9</b> |                    | <b>25.2</b> |             | <b>19.2</b> |
| <b>Rinse Blank Residue, mg.</b>       |  |             | <b>0.0</b>  |                    | <b>0.0</b>  |             | <b>0.0</b>  |
| <b>Net Rinse Catch, mg.</b>           |  |             | <b>22.9</b> |                    | <b>25.2</b> |             | <b>19.2</b> |
|                                       |  |             |             |                    |             |             |             |
| <b>FILTERABLE PARTICULATE, mg.</b>    |  |             | <b>48.2</b> |                    | <b>47.4</b> |             | <b>34.8</b> |

**Legend:** F = Final Weight

Notes &amp; Comments:

**PARTICULATE SAMPLING LABORATORY RESULTS**

|                                                         |  |             |  |                    |  |             |  |
|---------------------------------------------------------|--|-------------|--|--------------------|--|-------------|--|
| Client: <b>Air Control Techniques</b><br>Method: EPA M5 |  |             |  | RFA #: <b>2333</b> |  |             |  |
| <b>Run Number</b>                                       |  | S1-M5/202-1 |  | S1-M5/202-2        |  | S1-M5/202-3 |  |

|                                      |           |      |        |           |           |           |           |
|--------------------------------------|-----------|------|--------|-----------|-----------|-----------|-----------|
| Filter Container #                   |           |      |        |           |           |           |           |
|                                      | Date      | Init |        | Date      |           | Date      |           |
|                                      | 12/12/18  | JSC  | 0.4640 | 12/12/18  | 0.4633    | 12/12/18  | 0.4669    |
| Baggie Tare Wt., g.                  |           |      | 0.0000 |           | 0.0000    |           | 0.0000    |
| Filter Tare Wt., g.                  | 83Q-14653 |      | 0.4639 | 83Q-14654 | 0.4638    | 83Q-14655 | 0.4674    |
| FILTER SAMPLE WT., g.                |           |      | 0.0001 |           | -0.0005 * |           | -0.0005 * |
| *Filter Fragments In Rinse(Yes, No)? |           |      |        |           | NO        |           | NO        |

|                           |      |      |  |      |  |      |  |
|---------------------------|------|------|--|------|--|------|--|
| Front ½ Rinse Container # |      | 1199 |  | 2851 |  | 2706 |  |
|                           | Date | Init |  | Date |  | Date |  |

|                      |          |          |   |        |          |   |        |          |   |        |
|----------------------|----------|----------|---|--------|----------|---|--------|----------|---|--------|
|                      | 12/14/18 | JSC      | F | 3.8982 | 12/14/18 | F | 3.6719 | 12/14/18 | F | 3.6739 |
|                      | 12/13/18 | JSC      |   | 3.8983 | 12/13/18 |   | 3.6722 | 12/13/18 |   | 3.6743 |
| Tare Wt., g.         |          | ( 70 ml) |   | 3.8958 | ( 72 ml) |   | 3.6705 | ( 78 ml) |   | 3.6734 |
| RINSE SAMPLE WT., g. |          |          |   | 0.0024 |          |   | 0.0014 |          |   | 0.0005 |

|                                    |            |               |               |
|------------------------------------|------------|---------------|---------------|
| <b>Filter Catch, mg.</b>           | <b>0.1</b> | <b>0.0 **</b> | <b>0.0 **</b> |
| Rinse Catch, mg.                   | 2.4        | 1.4           | 0.5           |
| Rinse Blank Residue, mg.           | 0.0        | 0.0           | 0.0           |
| <b>Net Rinse Catch, mg.</b>        | <b>2.4</b> | <b>1.4</b>    | <b>0.5</b>    |
| <b>FILTERABLE PARTICULATE, mg.</b> | <b>2.5</b> | <b>1.4</b>    | <b>0.5</b>    |

\*\*Negative results adjusted to zero.

**Legend:** F = Final Weight

Notes & Comments:

## REAGENT BLANK LABORATORY RESULTS

|                                                         |               |                    |
|---------------------------------------------------------|---------------|--------------------|
| <b>Client: Air Control Techniques</b><br>Method: EPA M5 |               | <b>RFA #: 2333</b> |
| <b>Run Number</b>                                       | Acetone Blank |                    |

|                       |      |      |      |
|-----------------------|------|------|------|
| Sample ID/Container # | Date | Init | 3097 |
|                       |      |      |      |

|                |          |     |     |        |
|----------------|----------|-----|-----|--------|
|                | 12/14/18 | JSC |     | 3.7982 |
|                | 12/13/18 | JSC | F   | 3.7978 |
| Tare Wt., g.   | (        | 184 | ml) | 3.7978 |
| SAMPLE WT., g. |          |     |     | 0.0000 |

|                 |            |
|-----------------|------------|
| Blank Beaker #  | 3097       |
| Final wt., mg.  | 3.7978     |
| Tare wt., mg.   | 3.7978     |
| Residue, mg.    | 0.0        |
| Volume, ml.     | 184        |
| Density, mg/ml  | 785.0      |
| Conc., mg/mg    | 0.00E+00 ✓ |
| Upper Limit, mg | 1.00E-05   |

|                                 |
|---------------------------------|
| <b>Legend:</b> F = Final Weight |
|---------------------------------|

Notes & Comments:

**RESOLUTION ANALYTICS, INC.**

Specialists in Air Emissions Analysis

Client: Air Control Techniques

RFA #: 2333

Date Received: 12/10/18

Date Analyzed: 12/10/18

Analyst: JSC

Analysis: M202

Analyte(s): Condensible PM

## Analytical Narrative

---

### Sample Matrix & Components:

H<sub>2</sub>O liquid impinger samples, organic impinger rinses, CPM filter, reagent blanks

### Summary of Sample Prep and Analysis:

The samples were received in the lab at a temperature of less than 85° F, and logged in our custody records. The teflon filters were each sonicated/extracted 3 times with DI H<sub>2</sub>O, then 3 times with hexane. The extract was added to the appropriate sample fraction. The impinger contents were extracted 3 times with hexane and the extracts were combined with the organic rinses, then evaporated in pretared teflon baggies. The water fraction was evaporated in pretared teflon baggies to near dryness at 105° C, then at ambient until completely dry. When needed, the water fractions were resuspended in 50 mls DI H<sub>2</sub>O, titrated with 0.1 N NH<sub>4</sub>OH until acid neutralization, and then evaporated using the same procedure as before. Samples were then desiccated for 24 hours and weighed at a minimum of 6 hour intervals to constant weight. All weights were recorded to the nearest 0.1 mg. Where field blanks have been provided, samples have been blank corrected up to a maximum of 2.0 mg.

### Summary of Instrumentation:

Denver model Pinnacle Series analytical balance

**Analytical Detection Limit(s):** 0.1 mg per fraction

**Miscellaneous Comments Regarding Sample Analysis:** (Note unusual catch weights, interferences, odd sample behavior, and steps taken to confirm unusual results. Also note any deviations from standard analytical procedures, together with justification and possible affect on results. Specify samples when applicable).

No modifications to M202 analytical procedure were made. See data sheets for individual sample notes and comments.

**CONDENSIBLE PARTICULATE MATTER LABORATORY RESULTS**

|                                                       |  |             |  |                    |  |             |  |
|-------------------------------------------------------|--|-------------|--|--------------------|--|-------------|--|
| Client: <b>Air Control Techniques</b><br>Method: M202 |  |             |  | RFA #: <b>2333</b> |  |             |  |
| Run Number                                            |  | S3-M5/202-1 |  | S3-M5/202-2        |  | S3-M5/202-3 |  |

|                            |                   |                   |                   |                   |                   |                   |                   |
|----------------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|
| Acetone/Hexane Container # |                   | <u>2775</u>       |                   | <u>1561</u>       |                   | <u>1281</u>       |                   |
| <u>          </u>          | <u>          </u> | <u>          </u> | <u>          </u> | <u>          </u> | <u>          </u> | <u>          </u> | <u>          </u> |
|                            | Date              | Init              |                   | Date              |                   | Date              |                   |

|                      |          |     |   |               |          |   |               |          |   |               |
|----------------------|----------|-----|---|---------------|----------|---|---------------|----------|---|---------------|
|                      | 12/14/18 | JSC | F | 3.5833        | 12/14/18 | F | 3.6056        | 12/14/18 | F | 3.8497        |
|                      | 12/13/18 | JSC |   | 3.5838        | 12/13/18 |   | 3.6059        | 12/13/18 |   | 3.8501        |
| Tare Wt., g.         |          |     |   | <u>3.5810</u> |          |   | <u>3.6038</u> |          |   | <u>3.8459</u> |
| RINSE SAMPLE WT., g. |          |     |   | 0.0023        |          |   | 0.0018        |          |   | 0.0038        |

---

|                                 |                   |                   |                   |                   |                   |                   |                   |
|---------------------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|
| DI H <sub>2</sub> O Container # |                   | <u>2987</u>       |                   | <u>2810</u>       |                   | <u>2211</u>       |                   |
| <u>          </u>               | <u>          </u> | <u>          </u> | <u>          </u> | <u>          </u> | <u>          </u> | <u>          </u> | <u>          </u> |
|                                 | Date              | Init              |                   | Date              |                   | Date              |                   |

|                      |          |     |   |               |          |   |               |          |   |               |
|----------------------|----------|-----|---|---------------|----------|---|---------------|----------|---|---------------|
|                      | 12/14/18 | JSC | F | 3.7044        | 12/14/18 | F | 3.8828        | 12/14/18 | F | 3.5765        |
|                      | 12/13/18 | JSC |   | 3.7045        | 12/13/18 |   | 3.8832        | 12/13/18 |   | 3.5767        |
| Tare Wt., g.         |          |     |   | <u>3.7041</u> |          |   | <u>3.8823</u> |          |   | <u>3.5765</u> |
| RINSE SAMPLE WT., g. |          |     |   | 0.0003        |          |   | 0.0005        |          |   | 0.0000        |

---

|                                                |            |            |            |
|------------------------------------------------|------------|------------|------------|
| <b>Organic CPM Mass, mg.</b>                   | <b>2.3</b> | <b>1.8</b> | <b>3.8</b> |
| <b>Inorganic CPM Mass, mg</b>                  | <b>0.3</b> | <b>0.5</b> | <b>0.0</b> |
| Volume of NH <sub>4</sub> OH Added (N=0.1), ml |            |            |            |
| Correction For NH <sub>3</sub> Added, mg       | 0.00       | 0.00       | 0.00       |
| <b>Adjusted Inorganic CPM Mass, mg</b>         | <b>0.3</b> | <b>0.5</b> | <b>0.0</b> |
| <b>Total CPM Mass, mg *</b>                    | <b>0.7</b> | <b>0.4</b> | <b>1.9</b> |

\* Total CPM Mass results have been Field Train Blank corrected up to a maximum of 2.0 mg.

Notes &amp; Comments:

**CONDENSIBLE PARTICULATE MATTER LABORATORY RESULTS**

|                                                                                           |  |             |        |                    |  |             |  |
|-------------------------------------------------------------------------------------------|--|-------------|--------|--------------------|--|-------------|--|
| Client: <b>Air Control Techniques</b><br>Method: M202                                     |  |             |        | RFA #: <b>2333</b> |  |             |  |
| Run Number                                                                                |  | S1-M5/202-1 |        | S1-M5/202-2        |  | S1-M5/202-3 |  |
| Acetone/Hexane Container #                                                                |  | 3888        |        | 3437               |  | 2824        |  |
| Date                                                                                      |  | Init        |        | Date               |  | Date        |  |
| 12/14/18                                                                                  |  | JSC F       | 3.6830 | 12/14/18 F         |  | 12/14/18 F  |  |
| 12/13/18                                                                                  |  | JSC         | 3.6832 | 12/13/18           |  | 12/13/18    |  |
| Tare Wt., g.                                                                              |  |             | 3.6757 |                    |  |             |  |
| RINSE SAMPLE WT., g.                                                                      |  |             | 0.0073 |                    |  |             |  |
| DI H <sub>2</sub> O Container #                                                           |  | 2585        |        | 3378               |  | 3192        |  |
| Date                                                                                      |  | Init        |        | Date               |  | Date        |  |
| 12/14/18                                                                                  |  | JSC F       | 3.4500 | 12/14/18 F         |  | 12/14/18 F  |  |
| 12/13/18                                                                                  |  | JSC         | 3.4502 | 12/13/18           |  | 12/13/18    |  |
| Tare Wt., g.                                                                              |  |             | 3.4479 |                    |  |             |  |
| RINSE SAMPLE WT., g.                                                                      |  |             | 0.0021 |                    |  |             |  |
| Organic CPM Mass, mg.                                                                     |  | 7.3         |        | 5.8                |  | 5.1         |  |
| Inorganic CPM Mass, mg                                                                    |  | 2.1         |        | 2.1                |  | 2.0         |  |
| Volume of NH <sub>4</sub> OH Added (N=0.1), ml                                            |  |             |        |                    |  |             |  |
| Correction For NH <sub>3</sub> Added, mg                                                  |  | 0.00        |        | 0.00               |  | 0.00        |  |
| Adjusted Inorganic CPM Mass, mg                                                           |  | 2.1         |        | 2.1                |  | 2.0         |  |
| Total CPM Mass, mg *                                                                      |  | 7.5         |        | 6.0                |  | 5.2         |  |
| * Total CPM Mass results have been Field Train Blank corrected up to a maximum of 2.0 mg. |  |             |        |                    |  |             |  |

Notes &amp; Comments:



## FIELD TRAIN BLANK LABORATORY RESULTS

|                                                       |                    |
|-------------------------------------------------------|--------------------|
| Client: <b>Air Control Techniques</b><br>Method: M202 | RFA #: <b>2333</b> |
| Run Number                                            | M5/202-PB          |

Acetone/Hexane Container # 2955

|      |      |
|------|------|
| Date | Init |
|------|------|

|                      |          |     |   |        |
|----------------------|----------|-----|---|--------|
|                      | 12/14/18 | JSC | F | 3.8184 |
|                      | 12/13/18 | JSC |   | 3.8188 |
| Tare Wt., g.         |          |     |   | 3.8173 |
| RINSE SAMPLE WT., g. |          |     |   | 0.0011 |

DI H<sub>2</sub>O Container # 2312

|      |      |
|------|------|
| Date | Init |
|------|------|

|                      |          |     |   |        |
|----------------------|----------|-----|---|--------|
|                      | 12/14/18 | JSC | F | 3.5153 |
|                      | 12/13/18 | JSC |   | 3.5154 |
| Tare Wt., g.         |          |     |   | 3.5150 |
| RINSE SAMPLE WT., g. |          |     |   | 0.0003 |

|                                                |      |
|------------------------------------------------|------|
| Organic CPM Mass, mg.                          | 1.1  |
| Inorganic CPM Mass, mg                         | 0.3  |
| Volume of NH <sub>4</sub> OH Added (N=0.1), ml |      |
| Correction For NH <sub>3</sub> Added, mg       | 0.00 |
| Adjusted Inorganic CPM Mass, mg                | 0.3  |
| Total Proof Blank CPM Mass, mg                 | 1.4  |

Notes & Comments:

**FIELD TRAIN BLANK LABORATORY RESULTS**

|                                                       |                    |
|-------------------------------------------------------|--------------------|
| Client: <b>Air Control Techniques</b><br>Method: M202 | RFA #: <b>2333</b> |
| Run Number                                            | M5/202-FB          |

Acetone/Hexane Container # 2446

|      |      |
|------|------|
| Date | Init |
|------|------|

|                      |     |   |        |
|----------------------|-----|---|--------|
| 12/14/18             | JSC | F | 3.7845 |
| 12/13/18             | JSC |   | 3.7848 |
| Tare Wt., g.         |     |   | 3.7829 |
| RINSE SAMPLE WT., g. |     |   | 0.0016 |

DI H<sub>2</sub>O Container # 3269

|      |      |
|------|------|
| Date | Init |
|------|------|

|                      |     |   |        |
|----------------------|-----|---|--------|
| 12/14/18             | JSC | F | 3.6584 |
| 12/13/18             | JSC |   | 3.6585 |
| Tare Wt., g.         |     |   | 3.6581 |
| RINSE SAMPLE WT., g. |     |   | 0.0003 |

**Organic CPM Mass, mg.** **1.6**

**Inorganic CPM Mass, mg** **0.3**

Volume of NH<sub>4</sub>OH Added (N=0.1), ml

Correction For NH<sub>3</sub> Added, mg **0.00**

**Adjusted Inorganic CPM Mass, mg** **0.3**

**Total Field Train Blank CPM Mass, mg** **1.9**

Notes & Comments:

## FIELD REAGENT BLANK LABORATORY RESULTS

|                                                              |  |                |  |                    |  |                          |  |
|--------------------------------------------------------------|--|----------------|--|--------------------|--|--------------------------|--|
| <b>Client: Air Control Techniques</b><br><b>Method: M202</b> |  |                |  | <b>RFA #: 2333</b> |  |                          |  |
| <i>Run Number</i>                                            |  | <i>Acetone</i> |  | <i>Hexane</i>      |  | <i>DI H<sub>2</sub>O</i> |  |

|             |      |      |      |      |      |      |      |
|-------------|------|------|------|------|------|------|------|
| Container # |      |      | 3097 |      | 4003 |      | 3299 |
|             | Date | Init |      | Date |      | Date |      |

|                |          |       |        |          |     |        |          |     |        |
|----------------|----------|-------|--------|----------|-----|--------|----------|-----|--------|
|                | 12/14/18 | JSC   | 3.7982 | 12/14/18 | F   | 3.6623 | 12/14/18 | F   | 3.6241 |
|                | 12/13/18 | JSC F | 3.7978 | 12/13/18 | F   | 3.6623 | 12/13/18 | F   | 3.6241 |
| Tare Wt., g.   | ( 184    | ml)   | 3.7978 | ( 154    | ml) | 3.6621 | ( 200    | ml) | 3.6241 |
| SAMPLE WT., g. |          |       | 0.0000 |          |     | 0.0002 |          |     | 0.0000 |

|                                                 |          |          |          |
|-------------------------------------------------|----------|----------|----------|
| <b>Field Reagent Blank Mass, mg</b>             | 0.0      | 0.2      | 0.0      |
| <b>Field Reagent Blank Concentration, mg/mg</b> | 0.00E+00 | 1.98E-06 | 0.00E+00 |

Notes & Comments:

5 DAY QT ✓

Date Received: 12/10/18  
Date Analyzed: 12/10/18

[illegible]

QT ✓

Date Received: 12/10/18  
Date Analyzed: 12/10/18

[illegible]

**APPENDIX I-C**  
**CEMs Data Sheets**

| Enviva                    |                                         | RTO Dryer Exhaust |           |           |         |
|---------------------------|-----------------------------------------|-------------------|-----------|-----------|---------|
| Parameters                | Units                                   | Run 1             | Run 2     | Run 3     | Average |
| Date                      |                                         | 5-Dec-18          | 5-Dec-18  | 5-Dec-18  |         |
| Run Time                  |                                         | 0840-0947         | 1047-1157 | 1216-1327 |         |
| Oxygen                    | %                                       | 12.53             | 12.78     | 13.40     | 12.90   |
| Moisture                  | %                                       | 39.49             | 38.68     | 37.17     | 38.45   |
| Volumetric Flow Rate, Std | DSCFM                                   | 74,759            | 71,425    | 74,025    | 73,403  |
| Dryer Process Rate        | ODT/hr                                  | 67.0              | 64.1      | 64.7      | 65.3    |
| VOC Emissions             | Units                                   | Run 1             | Run 2     | Run 3     | Average |
| Concentration (actual)    | ppmv <sub>w</sub> as C <sub>3</sub>     | 6.19              | 6.88      | 5.82      | 6.30    |
| Concentration (dry)       | ppmv <sub>d</sub> as C <sub>3</sub>     | 10.2              | 11.2      | 9.3       | 10.2    |
| Emission Rate (propane)   | lb/hr as C <sub>3</sub> H <sub>8</sub>  | 5.3               | 5.5       | 4.7       | 5.2     |
| Emission Factor (propane) | lb/ODT as C <sub>3</sub> H <sub>8</sub> | 0.078             | 0.086     | 0.073     | 0.079   |
| NOx Emissions             | Units                                   | Run 1             | Run 2     | Run 3     | Average |
| Concentration (dry)       | ppm <sub>vd</sub>                       | 38.48             | 34.36     | 32.63     | 35.16   |
| Emission Rate             | lb/hr                                   | 20.6              | 17.6      | 17.3      | 18.5    |
| Emission Factor           | lb/ODT as NO <sub>2</sub>               | 0.31              | 0.27      | 0.27      | 0.28    |
| CO Emissions              | Units                                   | Run 1             | Run 2     | Run 3     | Average |
| Concentration (dry)       | ppm <sub>vd</sub>                       | 29.22             | 35.35     | 27.9      | 30.831  |
| Emission Rate             | lb/hr                                   | 9.5               | 11.0      | 9.0       | 9.9     |
| Emission Factor           | lb/ODT                                  | 0.14              | 0.17      | 0.14      | 0.15    |



Facility: Enviva  
Date: 12/5/18

Source: RTO Dryer Exhaust

| HAP             |            | Methanol          | Acetaldehyde        | Formaldehyde      | HCl                           | Supporting Data  |
|-----------------|------------|-------------------|---------------------|-------------------|-------------------------------|------------------|
| Formula         |            | CH <sub>4</sub> O | CH <sub>3</sub> CHO | CH <sub>2</sub> O | C <sub>6</sub> H <sub>6</sub> |                  |
| Mol Weight      | lb/lb mole | 32.04             | 44.05               | 30.31             | 36.46                         |                  |
| Response Factor |            | 0.65              | 1.00                | 0.00              | 0.00                          |                  |
| Run 1           |            |                   |                     |                   |                               |                  |
| Conc            | ppm wet    | 0.00              | 0.00                | 0.59              | 0.00                          |                  |
| Conc            | ppm dry    | 0.00              | 0.00                | 0.97              | 0.00                          | 39.49 % Moisture |
| Mass Emissions  | lb/hr      | 0.00              | 0.00                | 0.34              | 0.00                          | 74,759 DSCFM     |
| Emission Factor | lb/ODT     | 0.00              | 0.00                | 0.0051            | 0.00                          | 67.00 ODT/hr     |
| Run 2           |            |                   |                     |                   |                               |                  |
| Conc            | ppm wet    | 0.00              | 0.00                | 0.60              | 0.00                          |                  |
| Conc            | ppm dry    | 0.00              | 0.00                | 0.98              | 0.00                          | 38.68 % Moisture |
| Mass Emissions  | lb/hr      | 0.00              | 0.00                | 0.33              | 0.00                          | 71,425 DSCFM     |
| Emission Factor | lb/ODT     | 0.00              | 0.00                | 0.0051            | 0.00                          | 64.10 ODT/hr     |
| Run 3           |            |                   |                     |                   |                               |                  |
| Conc            | ppm wet    | 0.00              | 0.00                | 0.56              | 0.00                          |                  |
| Conc            | ppm dry    | 0.00              | 0.00                | 0.89              | 0.00                          | 37.17 % Moisture |
| Mass Emissions  | lb/hr      | 0.00              | 0.00                | 0.31              | 0.00                          | 74,025 DSCFM     |
| Emission Factor | lb/ODT     | 0.00              | 0.00                | 0.0048            | 0.00                          | 64.70 ODT/hr     |
| Averages        |            |                   |                     |                   |                               |                  |
| Conc            | ppm wet    | 0.00              | 0.00                | 0.58              | 0.00                          |                  |
| Conc            | ppm dry    | 0.00              | 0.00                | 0.95              | 0.00                          | 38.45 % Moisture |
| Mass Emissions  | lb/hr      | 0.00              | 0.00                | 0.33              | 0.00                          | 73,403 DSCFM     |
| Emission Factor | lb/ODT     | 0.00              | 0.00                | 0.0050            | 0.00                          |                  |
| ND values       |            |                   |                     |                   |                               |                  |

Enviva  
RTO Dryer Exhaust

Date: 5-Dec-18  
Run Time: 0840-0947

Run 1

| Parameter                                                     | Symbol                 | O <sub>2</sub><br>% | CO <sub>2</sub><br>% | CO<br>ppm      | NOx<br>ppm | THC<br>ppm (as C <sub>3</sub> H <sub>8</sub> ) |
|---------------------------------------------------------------|------------------------|---------------------|----------------------|----------------|------------|------------------------------------------------|
| <b>Analyzer Calibration Error - Calibration Standards</b>     |                        |                     |                      |                |            |                                                |
| Zero Gas                                                      | $C_{v, zero}$          | 0.0                 | 0.0                  | 0.0            | 0.0        | 0.0                                            |
| Low-Level Gas                                                 | $C_{v, low}$           | N/A                 | N/A                  | N/A            | N/A        | 30.07                                          |
| Mid-Level Gas                                                 | $C_{v, mid}$           | 11.05               | 9.952                | 226.4          | 48.0       | 52.38                                          |
| High-Level Gas                                                | $C_{v, high}$          | 21.99               | 18.22                | 450.0<br>983.4 | 89.5       | 85.84                                          |
| Calibration Span                                              | CS                     | 21.99               | 18.22                | 450            | 90         | 175                                            |
| <b>Analyzer Calibration Error - Instrument Response</b>       |                        |                     |                      |                |            |                                                |
| Zero Gas                                                      | $C_{Dir, zero}$        | 0.00                | 0.09                 | 0.25           | 0.2        | 0.1                                            |
| Low-Level Gas                                                 | $C_{Dir, low}$         | N/A                 | N/A                  | N/A            | N/A        | 30.3                                           |
| Mid-Level Gas                                                 | $C_{Dir, mid}$         | 11.04               | 10                   | 228.6          | 47.82      | 52.14                                          |
| High-Level Gas                                                | $C_{Dir, high}$        | 22.04               | 18.26                | 450            | 89.5       | 85.88                                          |
| <b>Analyzer Calibration Error - Results (Percent of Span)</b> |                        |                     |                      |                |            |                                                |
| Zero Gas                                                      | $ACE_{zero}$           | 0.0                 | 0.5                  | 0.1            | 0.2        | 0.1                                            |
| Low-Level Gas                                                 | $ACE_{low}$            | N/A                 | N/A                  | N/A            | N/A        | 0.8                                            |
| Mid-Level Gas                                                 | $ACE_{mid}$            | 0.0                 | 0.3                  | 0.5            | -0.2       | -0.5                                           |
| High-Level Gas                                                | $ACE_{high}$           | 0.2                 | 0.2                  | 0.0            | 0.0        | 0.0                                            |
| Specification                                                 | $ACE_{spec}$           | ±2                  | ±2                   | ±2             | ±2         | ±5                                             |
| <b>System Calibrations - Instrument Response</b>              |                        |                     |                      |                |            |                                                |
| Initial Zero                                                  | $C_{s, zero (pre)}$    | 0.05                | 0.09                 | 0.8            | 0.3        | 0.1                                            |
| Final Zero                                                    | $C_{s, zero (post)}$   | 0.04                | 0.09                 | 0.9            | 0.5        | 0.17                                           |
| Upscale Gas Standard                                          | $C_{MA}$               | 11.05               | 9.95                 | 226.4          | 48.0       | 52.4                                           |
| Initial Upscale                                               | $C_{v, up (pre)}$      | 11.044              | 9.96                 | 229            | 47.3       | 52.14                                          |
| Final Upscale                                                 | $C_{v, up (post)}$     | 11.07               | 10.02                | 227.5          | 47.1       | 52.42                                          |
| <b>System Bias - Results (Percent)</b>                        |                        |                     |                      |                |            |                                                |
| Zero (pre)                                                    | $SB_{i (zero)}$        | 0.2                 | 0.0                  | 0.1            | 0.1        | 0.0                                            |
| Zero (post)                                                   | $SB_{final (zero)}$    | 0.2                 | 0.0                  | 0.1            | 0.3        | 0.0                                            |
| Upscale (pre)                                                 | $SB_{i (upscale)}$     | 0.0                 | -0.2                 | 0.1            | -0.6       | 0.0                                            |
| Upscale (post)                                                | $SB_{final (upscale)}$ | 0.1                 | 0.1                  | -0.2           | -0.8       | 0.2                                            |
| Specification                                                 | $SB_{spec}$            | ±5                  | ±5                   | ±5             | ±5         | NA                                             |
| <b>System Drift - Results (Percent)</b>                       |                        |                     |                      |                |            |                                                |
| Zero                                                          | $D_{zero}$             | 0.0                 | 0.0                  | 0.0            | 0.2        | 0.0                                            |
| Upscale                                                       | $D_{upscale}$          | 0.1                 | 0.4                  | 0.3            | 0.2        | 0.2                                            |
| Specification                                                 | $D_{spec}$             | ±3                  | 3.0                  | 3.0            | 3.0        | ±3                                             |
| <b>Response Test - Results (seconds)</b>                      |                        |                     |                      |                |            |                                                |
| Upscale Test                                                  |                        | 35                  | 40                   | 35             | 35         | NA                                             |
| Zero Test                                                     |                        | 35                  | 40                   | 35             | 35         | NA                                             |
| Response Time                                                 |                        | 35                  | 40                   | 35             | 35         | 25                                             |
| <b>Calibration Correction</b>                                 |                        |                     |                      |                |            |                                                |
| Raw Average                                                   | $C_{ave}$              | 12.53               | 7.89                 | 30.2           | 37.9       | 6.42                                           |
| Bias Average - Zero                                           | $C_0$                  | 0.04                | 0.09                 | 0.85           | 0.38       | N/A                                            |
| Bias Average - Upscale                                        | $C_M$                  | 11.06               | 9.99                 | 228.25         | 47.20      | N/A                                            |
| Conc. Methane (J), wet C3                                     | $C_{me}$               | NA                  | NA                   | NA             | NA         | 0.23                                           |
| Corrected Run Average                                         | $C_{Gas}$              | 12.53               | 7.84                 | 29.22          | 38.48      | 6.19                                           |

Enviva  
RTO Dryer Exhaust

Date: 5-Dec-18  
Run Time: 1047-1157

Run 2

| Parameter                                                     | Symbol                 | O <sub>2</sub><br>% | CO <sub>2</sub><br>% | CO<br>ppm    | NOx<br>ppm   | THC<br>ppm (as C <sub>3</sub> H <sub>8</sub> ) |
|---------------------------------------------------------------|------------------------|---------------------|----------------------|--------------|--------------|------------------------------------------------|
| <b>Analyzer Calibration Error - Calibration Standards</b>     |                        |                     |                      |              |              |                                                |
| Zero Gas                                                      | $C_{v, zero}$          | 0.0                 | 0.0                  | 0.0          | 0.0          | 0.0                                            |
| Low-Level Gas                                                 | $C_{v, low}$           | N/A                 | N/A                  | N/A          | N/A          | 30.1                                           |
| Mid-Level Gas                                                 | $C_{v, mid}$           | 11.1                | 10.0                 | 226.4        | 48.0         | 52.4                                           |
| High-Level Gas                                                | $C_{v, high}$          | 22.0                | 18.2                 | 450.0        | 89.5         | 85.8                                           |
| Calibration Span                                              | CS                     | 22.0                | 18.2                 | 450.0        | 89.5         | 175                                            |
| <b>Analyzer Calibration Error - Instrument Response</b>       |                        |                     |                      |              |              |                                                |
| Zero Gas                                                      | $C_{Dir, zero}$        | 0.0                 | 0.1                  | 0.3          | 0.2          | 0.1                                            |
| Low-Level Gas                                                 | $C_{Dir, low}$         | N/A                 | N/A                  | N/A          | N/A          | 30.3                                           |
| Mid-Level Gas                                                 | $C_{Dir, mid}$         | 11.0                | 10.0                 | 228.6        | 47.8         | 52.1                                           |
| High-Level Gas                                                | $C_{Dir, high}$        | 22.0                | 18.3                 | 450.0        | 89.5         | 85.9                                           |
| <b>Analyzer Calibration Error - Results (Percent of Span)</b> |                        |                     |                      |              |              |                                                |
| Zero Gas                                                      | $ACE_{zero}$           | 0.0                 | 0.5                  | 0.1          | 0.2          | 0.1                                            |
| Low-Level Gas                                                 | $ACE_{low}$            | N/A                 | N/A                  | N/A          | N/A          | 0.8                                            |
| Mid-Level Gas                                                 | $ACE_{mid}$            | 0.0                 | 0.3                  | 0.5          | -0.2         | -0.5                                           |
| High-Level Gas                                                | $ACE_{high}$           | 0.2                 | 0.2                  | 0.0          | 0.0          | 0.0                                            |
| Specification                                                 | $ACE_{spec}$           | ±2                  | ±2                   | ±2           | ±2           | ±5                                             |
| <b>System Calibrations - Instrument Response</b>              |                        |                     |                      |              |              |                                                |
| Initial Zero                                                  | $C_{s, zero (pre)}$    | 0.01                | 0.09                 | 0.90         | 0.46         | 0.17                                           |
| Final Zero                                                    | $C_{s, zero (post)}$   | 0.035               | 0.09                 | 0.9          | 0.6          | 0.59                                           |
| Upscale Gas Standard                                          | $C_{MA}$               | 11.05               | 9.95                 | 226.4        | 48.0         | 52.4                                           |
| Initial Upscale                                               | $C_{v, up (pre)}$      | 11.07               | 10.024               | 227.5        | 47.1         | 52.42                                          |
| Final Upscale                                                 | $C_{v, up (post)}$     | 11.025              | 10.119               | 227.7        | 47.16        | 52.23                                          |
| <b>System Bias - Results (Percent)</b>                        |                        |                     |                      |              |              |                                                |
| Zero (pre)                                                    | $SB_{i (zero)}$        | 0.1                 | 0.0                  | 0.1          | 0.3          | 0.0                                            |
| Zero (post)                                                   | $SB_{final (zero)}$    | 0.2                 | 0.0                  | 0.1          | 0.4          | 0.3                                            |
| Upscale (pre)                                                 | $SB_{i (upscale)}$     | 0.1                 | 0.1                  | -0.2         | -0.8         | 0.2                                            |
| Upscale (post)                                                | $SB_{final (upscale)}$ | -0.1                | 0.7                  | -0.2         | -0.7         | 0.1                                            |
| Specification                                                 | $SB_{spec}$            | ±5                  | ±5                   | ±5           | ±5           | NA                                             |
| <b>System Drift - Results (Percent)</b>                       |                        |                     |                      |              |              |                                                |
| Zero                                                          | $D_{zero}$             | 0.1                 | 0.0                  | 0.0          | 0.2          | 0.2                                            |
| Upscale                                                       | $D_{upscale}$          | 0.2                 | 0.5                  | 0.0          | 0.1          | -0.1                                           |
| Specification                                                 | $D_{spec}$             | ±3                  | 3.0                  | 3.0          | 3.0          | ±3                                             |
| <b>Response Test - Results (seconds)</b>                      |                        |                     |                      |              |              |                                                |
| Upscale Test                                                  |                        | 35                  | 40                   | 35           | 35           | NA                                             |
| Zero Test                                                     |                        | 35                  | 40                   | 35           | 35           | NA                                             |
| Response Time                                                 |                        | 35                  | 40                   | 35           | 35           | 25                                             |
| <b>Calibration Correction</b>                                 |                        |                     |                      |              |              |                                                |
| Raw Average                                                   | $C_{ave}$              | 12.77               | 7.67                 | 36.3         | 33.89        | 7.11                                           |
| Bias Average - Zero                                           | $C_0$                  | 0.02                | 0.09                 | 0.90         | 0.53         | N/A                                            |
| Bias Average - Upscale                                        | $C_M$                  | 11.05               | 10.07                | 227.60       | 47.13        | N/A                                            |
| Conc. Methane (J), wet C3                                     | $C_{me}$               | NA                  | NA                   | NA           | NA           | 0.23                                           |
| Corrected Run Average                                         | $C_{Gas}$              | <b>12.78</b>        | <b>7.56</b>          | <b>35.35</b> | <b>34.36</b> | <b>6.88</b>                                    |

Enviva  
RTO Dryer Exhaust

Date: 5-Dec-18  
Run Time: 1216-1327

Run 3

| Parameter                                                     | Symbol                 | O <sub>2</sub><br>% | CO <sub>2</sub><br>% | CO<br>ppm | NOx<br>ppm | THC<br>ppm (as C <sub>3</sub> H <sub>8</sub> ) |
|---------------------------------------------------------------|------------------------|---------------------|----------------------|-----------|------------|------------------------------------------------|
| <b>Analyzer Calibration Error - Calibration Standards</b>     |                        |                     |                      |           |            |                                                |
| Zero Gas                                                      | $C_{v, zero}$          | 0.0                 | 0.0                  | 0.0       | 0.0        | 0.0                                            |
| Low-Level Gas                                                 | $C_{v, low}$           | N/A                 | N/A                  | N/A       | N/A        | 30.1                                           |
| Mid-Level Gas                                                 | $C_{v, mid}$           | 11.1                | 10.0                 | 226.4     | 48.0       | 52.4                                           |
| High-Level Gas                                                | $C_{v, high}$          | 22.0                | 18.2                 | 450.0     | 89.5       | 85.8                                           |
| Calibration Span                                              | CS                     | 21.99               | 18.22                | 450.0     | 89.5       | 175.0                                          |
| <b>Analyzer Calibration Error - Instrument Response</b>       |                        |                     |                      |           |            |                                                |
| Zero Gas                                                      | $C_{Dir, zero}$        | 0.0                 | 0.1                  | 0.3       | 0.2        | 0.09                                           |
| Low-Level Gas                                                 | $C_{Dir, low}$         | N/A                 | N/A                  | N/A       | N/A        | 30.3                                           |
| Mid-Level Gas                                                 | $C_{Dir, mid}$         | 11.0                | 10.0                 | 228.6     | 47.8       | 52.1                                           |
| High-Level Gas                                                | $C_{Dir, high}$        | 22.0                | 18.3                 | 450.0     | 89.5       | 85.9                                           |
| <b>Analyzer Calibration Error - Results (Percent of Span)</b> |                        |                     |                      |           |            |                                                |
| Zero Gas                                                      | $ACE_{zero}$           | 0.0                 | 0.5                  | 0.1       | 0.2        | 0.1                                            |
| Low-Level Gas                                                 | $ACE_{low}$            | N/A                 | N/A                  | N/A       | N/A        | 0.8                                            |
| Mid-Level Gas                                                 | $ACE_{mid}$            | 0.0                 | 0.3                  | 0.5       | -0.2       | -0.5                                           |
| High-Level Gas                                                | $ACE_{high}$           | 0.2                 | 0.2                  | 0.0       | 0.0        | 0.0                                            |
| Specification                                                 | $ACE_{spec}$           | ±2                  | ±2                   | ±2        | ±2         | ±5                                             |
| <b>System Calibrations - Instrument Response</b>              |                        |                     |                      |           |            |                                                |
| Initial Zero                                                  | $C_{s, zero (pre)}$    | 0.04                | 0.09                 | 0.90      | 0.60       | 0.59                                           |
| Final Zero                                                    | $C_{s, zero (post)}$   | 0.048               | 0.09                 |           | 0.59       | 0.6                                            |
| Upscale Gas Standard                                          | $C_{MA}$               | 11.05               | 9.95                 | 226.4     | 48.0       | 52.4                                           |
| Initial Upscale                                               | $C_{v, up (pre)}$      | 11.025              | 10.119               | 227.7     | 47.16      | 52.23                                          |
| Final Upscale                                                 | $C_{v, up (post)}$     | 11.078              | 9.962                | 228.2     | 45         | 52.02                                          |
| <b>System Bias - Results (Percent)</b>                        |                        |                     |                      |           |            |                                                |
| Zero (pre)                                                    | $SB_{i (zero)}$        | 0.2                 | 0.0                  | 0.1       | 0.4        | 0.3                                            |
| Zero (post)                                                   | $SB_{final (zero)}$    | 0.2                 | 0.0                  | -0.1      | 0.4        | 0.3                                            |
| Upscale (pre)                                                 | $SB_{i (upscale)}$     | -0.1                | 0.7                  | -0.2      | -0.7       | 0.1                                            |
| Upscale (post)                                                | $SB_{final (upscale)}$ | 0.2                 | -0.2                 | -0.1      | -3.2       | -0.1                                           |
| Specification                                                 | $SB_{spec}$            | ±5                  | ±5                   | ±5        | ±5         | NA                                             |
| <b>System Drift - Results (Percent)</b>                       |                        |                     |                      |           |            |                                                |
| Zero                                                          | $D_{zero}$             | 0.1                 | 0.0                  | 0.2       | 0.0        | 0.0                                            |
| Upscale                                                       | $D_{upscale}$          | 0.2                 | 0.9                  | 0.1       | 2.4        | -0.1                                           |
| Specification                                                 | $D_{spec}$             | ±3                  | 3.0                  | 3.0       | 3.0        | ±3                                             |
| <b>Response Test - Results (seconds)</b>                      |                        |                     |                      |           |            |                                                |
| Upscale Test                                                  |                        | 35                  | 40                   | 35        | 35         | NA                                             |
| Zero Test                                                     |                        | 35                  | 40                   | 35        | 35         | NA                                             |
| Response Time                                                 |                        | 35                  | 40                   | 35        | 35         | 25                                             |
| <b>Calibration Correction</b>                                 |                        |                     |                      |           |            |                                                |
| Raw Average                                                   | $C_{ave}$              | 13.40               | 7.12                 | 28.9      | 31.5       | 6.14                                           |
| Bias Average - Zero                                           | $C_0$                  | 0.04                | 0.09                 | 0.90      | 0.60       | N/A                                            |
| Bias Average - Upscale                                        | $C_M$                  | 11.05               | 10.04                | 227.95    | 46.08      | N/A                                            |
| Conc. Methane (J), wet C3                                     | $C_{me}$               | NA                  | NA                   | NA        | NA         | 0.32                                           |
| Corrected Run Average                                         | $C_{Gas}$              | 13.40               | 7.12                 | 27.92     | 32.63      | 5.82                                           |

Test Run 4 Begin. STRATA Version 3.2.112

Operator: David Goshaw

Plant Name: Enviva Greenwood

Location: DHM Stack

|                 |         | O2<br>% | CO2<br>ppm | THC<br>ppm | NOx<br>ppm | CO<br>ppm |
|-----------------|---------|---------|------------|------------|------------|-----------|
| Start Averaging |         |         |            |            |            |           |
| 12/5/2018       | 8:40:21 | 12.585  | 7.818      | 8.1        | 38.68      | 19.4      |
| 12/5/2018       | 8:41:22 | 12.697  | 7.696      | 3.16       | 38.25      | 32.5      |
| 12/5/2018       | 8:42:22 | 12.611  | 7.753      | 9.04       | 37.91      | 34.9      |
| 12/5/2018       | 8:43:22 | 12.719  | 7.741      | 4.93       | 37.84      | 32        |
| 12/5/2018       | 8:44:22 | 12.796  | 7.596      | 6.19       | 37.5       | 32.6      |
| 12/5/2018       | 8:45:22 | 12.494  | 7.822      | 7.75       | 37.36      | 15.9      |
| 12/5/2018       | 8:46:22 | 12.434  | 7.955      | 2.87       | 38.16      | 25.3      |
| 12/5/2018       | 8:47:22 | 12.536  | 7.92       | 8.71       | 38.9       | 25.2      |
| 12/5/2018       | 8:48:22 | 12.466  | 7.872      | 4.72       | 38.93      | 29        |
| 12/5/2018       | 8:49:22 | 12.475  | 7.974      | 6.88       | 38.64      | 39.7      |
| 12/5/2018       | 8:50:22 | 12.499  | 7.981      | 8.44       | 38.35      | 32        |
| 12/5/2018       | 8:51:22 | 12.482  | 7.839      | 3.16       | 37.72      | 37        |
| 12/5/2018       | 8:52:22 | 12.286  | 8.062      | 8.64       | 37.59      | 28.8      |
| 12/5/2018       | 8:53:22 | 12.21   | 8.215      | 4.96       | 38.29      | 22.9      |
| 12/5/2018       | 8:54:22 | 12.484  | 8.047      | 6.8        | 38.57      | 34        |
| 12/5/2018       | 8:55:22 | 12.507  | 7.858      | 8.54       | 38.01      | 29.1      |
| 12/5/2018       | 8:56:22 | 12.517  | 7.913      | 3.82       | 37.51      | 40.8      |
| 12/5/2018       | 8:57:22 | 12.6    | 7.837      | 8.83       | 37.61      | 36        |
| 12/5/2018       | 8:58:22 | 12.596  | 7.778      | 4.59       | 37.3       | 20.3      |
| 12/5/2018       | 8:59:22 | 12.47   | 7.949      | 6.69       | 37.12      | 29.2      |
| 12/5/2018       | 9:00:22 | 12.295  | 8.089      | 8.28       | 37.76      | 21.7      |
| 12/5/2018       | 9:01:22 | 12.455  | 8.002      | 3.1        | 38.1       | 33.9      |
| 12/5/2018       | 9:02:22 | 12.386  | 8.004      | 8.86       | 37.75      | 36.8      |
| 12/5/2018       | 9:03:22 | 12.477  | 7.949      | 4.91       | 37.64      | 33.7      |
| 12/5/2018       | 9:04:22 | 12.509  | 7.982      | 6.84       | 37.65      | 39        |
| 12/5/2018       | 9:05:22 | 12.523  | 7.882      | 7.99       | 37.5       | 20.4      |
| 12/5/2018       | 9:06:22 | 12.694  | 7.794      | 3.31       | 37.3       | 28.4      |
| 12/5/2018       | 9:07:22 | 12.643  | 7.786      | 9.04       | 36.96      | 25.2      |
| 12/5/2018       | 9:08:22 | 12.796  | 7.685      | 4.67       | 36.52      | 28.9      |
| 12/5/2018       | 9:09:22 | 12.695  | 7.672      | 7.04       | 36.4       | 39.6      |
| 12/5/2018       | 9:10:22 | 12.438  | 7.875      | 8.29       | 36.9       | 34.5      |
| 12/5/2018       | 9:11:22 | 12.567  | 7.963      | 2.82       | 37.65      | 31.6      |
| Pause           |         |         |            |            |            |           |
| 12/5/2018       | 9:12:22 | 15.345  | 7.461      | 8.33       | 36.32      | 23.2      |
| 12/5/2018       | 9:13:22 | 17.012  | 2.053      | 4.68       | 13.33      | 13.8      |
| End Pause       |         |         |            |            |            |           |
| 12/5/2018       | 9:14:22 | 12.692  | 7.191      | 7.19       | 31.36      | 29.8      |
| 12/5/2018       | 9:15:22 | 12.524  | 7.866      | 8.26       | 37.48      | 27.7      |
| 12/5/2018       | 9:16:22 | 12.727  | 7.757      | 4.13       | 37.48      | 40.2      |
| 12/5/2018       | 9:17:21 | 12.643  | 7.755      | 9.09       | 37.12      | 35.2      |
| 12/5/2018       | 9:18:21 | 12.605  | 7.812      | 4.01       | 37.15      | 19.3      |
| 12/5/2018       | 9:19:23 | 12.662  | 7.821      | 7.01       | 37.3       | 26        |
| 12/5/2018       | 9:20:22 | 12.57   | 7.835      | 8.27       | 37.37      | 18.5      |

Test Run 4 Begin. STRATA Version 3.2.112

Operator: David Goshaw

Plant Name: Enviva Greenwood

Location: DHM Stack

|           |          | O2<br>% | CO2<br>ppm | THC<br>ppm | NOx<br>ppm | CO<br>ppm |
|-----------|----------|---------|------------|------------|------------|-----------|
| 12/5/2018 | 9:21:23  | 12.668  | 7.724      | 3.16       | 37.35      | 32.9      |
| 12/5/2018 | 9:22:22  | 12.615  | 7.844      | 9.21       | 37.33      | 35        |
| 12/5/2018 | 9:23:22  | 12.592  | 7.841      | 4.76       | 37.31      | 35        |
| 12/5/2018 | 9:24:22  | 12.656  | 7.853      | 6.72       | 37.43      | 36.3      |
| 12/5/2018 | 9:25:22  | 12.654  | 7.791      | 7.85       | 37.56      | 20.1      |
| 12/5/2018 | 9:26:22  | 12.498  | 7.793      | 3.26       | 37.49      | 32.4      |
| 12/5/2018 | 9:27:22  | 12.391  | 8.09       | 9.26       | 38.01      | 28.5      |
| 12/5/2018 | 9:28:22  | 12.434  | 7.934      | 4.44       | 38.51      | 29.3      |
| 12/5/2018 | 9:29:22  | 12.44   | 8.027      | 8.53       | 38.38      | 40.8      |
| 12/5/2018 | 9:30:22  | 12.51   | 7.956      | 9          | 38.3       | 34.4      |
| 12/5/2018 | 9:31:22  | 12.597  | 7.909      | 3.5        | 38.11      | 28.8      |
| 12/5/2018 | 9:32:22  | 12.625  | 7.823      | 8.74       | 37.9       | 22.5      |
| 12/5/2018 | 9:33:22  | 12.515  | 7.887      | 3.93       | 37.87      | 22.5      |
| 12/5/2018 | 9:34:21  | 12.593  | 7.933      | 7.64       | 38.14      | 31.7      |
| 12/5/2018 | 9:35:21  | 12.626  | 7.811      | 8.22       | 38.17      | 27.7      |
| 12/5/2018 | 9:36:21  | 12.632  | 7.737      | 3.46       | 37.83      | 40.8      |
| 12/5/2018 | 9:37:22  | 12.435  | 7.95       | 8.37       | 37.99      | 36.1      |
| 12/5/2018 | 9:38:22  | 12.445  | 8.014      | 4.08       | 38.56      | 22.7      |
| 12/5/2018 | 9:39:22  | 12.457  | 7.979      | 7.22       | 38.72      | 30.1      |
| 12/5/2018 | 9:40:22  | 12.212  | 8.134      | 8.46       | 38.89      | 21.5      |
| 12/5/2018 | 9:41:22  | 12.342  | 8.146      | 3.43       | 39.42      | 34.7      |
| 12/5/2018 | 9:42:22  | 12.373  | 8.106      | 9.22       | 39.69      | 37.3      |
| 12/5/2018 | 9:43:22  | 12.521  | 7.892      | 4.3        | 39.26      | 36.9      |
| 12/5/2018 | 9:44:21  | 12.582  | 7.927      | 7.27       | 38.88      | 34.7      |
| 12/5/2018 | 9:45:21  | 12.579  | 7.847      | 7.72       | 38.55      | 14.8      |
| 12/5/2018 | 9:46:23  | 12.506  | 7.871      | 3.15       | 38.21      | 28.4      |
| 12/5/2018 | 9:47:22  | 12.411  | 8.024      | 8.76       | 38.26      | 26.1      |
| Average   | 2910 sam | 12.534  | 7.891      | 6.42       | 37.91      | 30.2      |

Test Run 4 End

Test Run 5 Begin. STRATA Version 3.2.112

Operator: David Goshaw

Plant Name: Enviva Greenwood

Location: Dryer

|           |          | O2<br>% | CO2<br>ppm | THC<br>ppm | NOx<br>ppm | CO<br>ppm |
|-----------|----------|---------|------------|------------|------------|-----------|
| 12/5/2018 | 10:48:00 | 12.562  | 7.878      | 3.54       | 37.45      | 28.4      |
| 12/5/2018 | 10:49:00 | 12.605  | 7.875      | 9.14       | 36.98      | 24.8      |
| 12/5/2018 | 10:50:00 | 12.545  | 7.885      | 3.88       | 36.16      | 34.7      |
| 12/5/2018 | 10:51:00 | 12.568  | 7.897      | 8.64       | 35.82      | 33.4      |
| 12/5/2018 | 10:52:01 | 12.613  | 7.82       | 7.51       | 35.93      | 13.6      |
| 12/5/2018 | 10:53:01 | 12.59   | 7.827      | 3.44       | 36         | 23.5      |
| 12/5/2018 | 10:54:01 | 12.588  | 7.947      | 8.59       | 36.35      | 21.4      |
| 12/5/2018 | 10:55:01 | 12.725  | 7.755      | 3.23       | 36.39      | 29.2      |
| 12/5/2018 | 10:56:00 | 12.618  | 7.733      | 8.74       | 35.97      | 37.2      |
| 12/5/2018 | 10:57:00 | 12.471  | 7.84       | 7.78       | 36.03      | 34        |
| 12/5/2018 | 10:58:01 | 12.496  | 7.995      | 3.32       | 36.59      | 34.1      |
| 12/5/2018 | 10:59:01 | 12.682  | 7.857      | 8.55       | 36.59      | 24.1      |
| 12/5/2018 | 11:00:01 | 12.665  | 7.73       | 3.23       | 35.68      | 24.8      |
| 12/5/2018 | 11:01:01 | 12.728  | 7.833      | 8.35       | 35.27      | 30.1      |
| 12/5/2018 | 11:02:01 | 12.807  | 7.647      | 8.01       | 35.05      | 27.7      |
| 12/5/2018 | 11:03:01 | 12.99   | 7.535      | 4.4        | 34.44      | 39.1      |
| 12/5/2018 | 11:04:01 | 13.139  | 7.418      | 9.31       | 34.04      | 36.4      |
| 12/5/2018 | 11:05:01 | 12.986  | 7.344      | 3.65       | 33.82      | 20.5      |
| 12/5/2018 | 11:06:01 | 12.752  | 7.613      | 8.05       | 34.13      | 23.3      |
| 12/5/2018 | 11:07:01 | 12.606  | 7.787      | 7.59       | 35.03      | 17.4      |
| 12/5/2018 | 11:08:00 | 12.57   | 7.887      | 3.29       | 35.64      | 33.1      |
| 12/5/2018 | 11:09:00 | 12.689  | 7.829      | 8.56       | 35.86      | 32.9      |
| 12/5/2018 | 11:10:00 | 12.736  | 7.735      | 3.31       | 35.55      | 36.1      |
| 12/5/2018 | 11:11:00 | 12.694  | 7.727      | 7.82       | 35.21      | 37.1      |
| 12/5/2018 | 11:12:00 | 12.607  | 7.876      | 7.05       | 35.27      | 19.3      |
| 12/5/2018 | 11:13:00 | 12.411  | 7.928      | 3.66       | 35.48      | 30.2      |
| 12/5/2018 | 11:14:01 | 12.463  | 8.017      | 8.32       | 35.93      | 25.4      |
| 12/5/2018 | 11:15:01 | 12.513  | 7.933      | 2.81       | 36.15      | 29.4      |
| 12/5/2018 | 11:16:01 | 12.579  | 7.904      | 8.59       | 35.88      | 39.6      |
| 12/5/2018 | 11:17:01 | 12.66   | 7.826      | 7.85       | 35.56      | 33.8      |
| 12/5/2018 | 11:18:01 | 12.691  | 7.809      | 3.17       | 35.47      | 30.4      |
| 12/5/2018 | 11:19:01 | 12.729  | 7.774      | 7.97       | 35.64      | 21.5      |
| 12/5/2018 | 11:20:01 | 12.847  | 7.603      | 2.95       | 35.49      | 23.6      |
| 12/5/2018 | 11:21:01 | 12.817  | 7.637      | 7.99       | 35.36      | 30.1      |
| 12/5/2018 | 11:22:01 | 12.805  | 7.663      | 7.59       | 35.38      | 27.7      |
| 12/5/2018 | 11:23:01 | 12.967  | 7.63       | 4.15       | 34.93      | 41.7      |
| 12/5/2018 | 11:24:01 | 12.987  | 7.518      | 8.25       | 34.56      | 36.1      |
| 12/5/2018 | 11:25:01 | 13.097  | 7.413      | 2.29       | 34.51      | 24        |
| 12/5/2018 | 11:26:01 | 13.107  | 7.349      | 7.62       | 34.31      | 27.1      |
| 12/5/2018 | 11:27:01 | 12.782  | 7.575      | 7.16       | 34.31      | 20.8      |
| 12/5/2018 | 11:28:00 | 12.882  | 7.626      | 3.53       | 34.79      | 31.6      |
| 12/5/2018 | 11:29:00 | 12.948  | 7.593      | 8.74       | 35.07      | 30.3      |
| 12/5/2018 | 11:30:00 | 13.008  | 7.424      | 3.43       | 34.93      | 39.5      |
| 12/5/2018 | 11:31:00 | 13.076  | 7.429      | 8.33       | 35.02      | 34.5      |



Test Run 5 Begin. STRATA Version 3.2.112

Operator: David Goshaw

Plant Name: Enviva Greenwood

Location: Dryer

|           |          | O2<br>% | CO2<br>ppm | THC<br>ppm | NOx<br>ppm | CO<br>ppm |
|-----------|----------|---------|------------|------------|------------|-----------|
| 12/5/2018 | 11:32:00 | 13.028  | 7.445      | 7.31       | 35.14      | 15.4      |
| 12/5/2018 | 11:33:01 | 13.083  | 7.359      | 3.35       | 34.93      | 25.5      |
| 12/5/2018 | 11:34:01 | 13.055  | 7.429      | 7.88       | 34.83      | 21        |
| 12/5/2018 | 11:35:01 | 13.176  | 7.323      | 2.65       | 34.61      | 27.5      |
| 12/5/2018 | 11:36:01 | 13.249  | 7.235      | 8.28       | 34.09      | 32.1      |
| 12/5/2018 | 11:37:01 | 13.244  | 7.233      | 7.21       | 33.78      | 32.7      |
| 12/5/2018 | 11:38:01 | 13.318  | 7.216      | 2.87       | 33.44      | 31.1      |
| Pause     |          |         |            |            |            |           |
| 12/5/2018 | 11:39:00 | 14.232  | 7.179      | 7.62       | 33.04      | 15.1      |
| 12/5/2018 | 11:40:00 | 16.093  | 3.988      | 2.88       | 20.58      | 15.8      |
| 12/5/2018 | 11:41:01 | 13.259  | 7.001      | 8.04       | 32.97      | 24.1      |
| 12/5/2018 | 11:42:01 | 13.286  | 7.232      | 7.35       | 33.73      | 25.3      |
| 12/5/2018 | 11:43:01 | 13.126  | 7.311      | 3.44       | 33.79      | 35.7      |
| End Pause |          |         |            |            |            |           |
| 12/5/2018 | 11:44:01 | 13.226  | 7.307      | 7.96       | 34.1       | 32.2      |
| 12/5/2018 | 11:45:01 | 13.318  | 7.187      | 2.37       | 34.32      | 27.1      |
| 12/5/2018 | 11:46:01 | 13.127  | 7.261      | 7.48       | 34.12      | 19.7      |
| 12/5/2018 | 11:47:01 | 12.792  | 7.543      | 7.15       | 34.49      | 18.4      |
| 12/5/2018 | 11:48:00 | 13.128  | 7.52       | 3.13       | 35.17      | 31.8      |
| 12/5/2018 | 11:49:00 | 13.137  | 7.352      | 8.02       | 34.66      | 29.4      |
| 12/5/2018 | 11:50:01 | 13.141  | 7.313      | 2.84       | 33.53      | 36.6      |
| 12/5/2018 | 11:51:00 | 12.953  | 7.511      | 7.6        | 33.39      | 38.6      |
| 12/5/2018 | 11:52:01 | 12.946  | 7.495      | 6.65       | 33.69      | 17.7      |
| 12/5/2018 | 11:53:01 | 13.002  | 7.479      | 3          | 33.81      | 28        |
| 12/5/2018 | 11:54:01 | 12.906  | 7.58       | 7.73       | 34.05      | 22.7      |
| 12/5/2018 | 11:55:01 | 12.9    | 7.52       | 2.48       | 34.03      | 28.7      |
| 12/5/2018 | 11:56:01 | 12.875  | 7.634      | 8.14       | 33.89      | 35.2      |
| 12/5/2018 | 11:57:00 | 12.77   | 7.672      | 7.11       | 33.89      | 36.3      |

Test Run 5 End

Run 3

Operator: David Goshaw

Plant Name: Enviva Greenwood

Location: Dryer Stack

|                 |          | O2<br>% | CO2<br>ppm | THC<br>ppm | NOx<br>ppm | CO<br>ppm |
|-----------------|----------|---------|------------|------------|------------|-----------|
| Start Averaging |          |         |            |            |            |           |
| 12/5/2018       | 12:17:04 | 12.801  | 7.712      | 8.16       | 35.6       | 36.3      |
| 12/5/2018       | 12:18:04 | 13.176  | 7.511      | 3.07       | 34.71      | 32.2      |
| 12/5/2018       | 12:19:04 | 13.321  | 7.229      | 7.38       | 34.1       | 23.9      |
| 12/5/2018       | 12:20:04 | 13.335  | 7.122      | 3.11       | 33.23      | 25.2      |
| 12/5/2018       | 12:21:04 | 13.347  | 7.181      | 7.07       | 32.83      | 29        |
| 12/5/2018       | 12:22:04 | 13.574  | 7.013      | 7.75       | 32.45      | 29        |
| 12/5/2018       | 12:23:04 | 13.797  | 6.809      | 4.22       | 31.49      | 41.3      |
| 12/5/2018       | 12:24:04 | 13.85   | 6.658      | 8.43       | 30.76      | 36.4      |
| 12/5/2018       | 12:25:04 | 13.812  | 6.691      | 3.42       | 30.31      | 26.7      |
| 12/5/2018       | 12:26:04 | 13.719  | 6.738      | 6.94       | 30.1       | 19.9      |
| 12/5/2018       | 12:27:04 | 13.344  | 6.975      | 6.92       | 30.46      | 17.5      |
| 12/5/2018       | 12:28:04 | 13.288  | 7.174      | 3.14       | 31.41      | 26.4      |
| 12/5/2018       | 12:29:04 | 13.39   | 7.155      | 8.37       | 32.35      | 32.7      |
| 12/5/2018       | 12:30:04 | 13.391  | 7.087      | 3.92       | 32.39      | 39.3      |
| 12/5/2018       | 12:31:04 | 13.35   | 7.179      | 7.57       | 32.22      | 40.3      |
| 12/5/2018       | 12:32:03 | 13.248  | 7.263      | 6.96       | 32.66      | 24.2      |
| 12/5/2018       | 12:33:05 | 13.036  | 7.296      | 3.26       | 32.78      | 27.3      |
| 12/5/2018       | 12:34:05 | 12.757  | 7.73       | 8.45       | 34.78      | 27.8      |
| 12/5/2018       | 12:35:03 | 12.876  | 7.562      | 3.85       | 33.53      | 40        |
| 12/5/2018       | 12:36:05 | 13.048  | 7.581      | 8.88       | 34.4       | 48        |
| 12/5/2018       | 12:37:05 | 13.074  | 7.392      | 8.45       | 33.96      | 43.2      |
| 12/5/2018       | 12:38:04 | 13.146  | 7.417      | 3.09       | 33.38      | 35        |
| 12/5/2018       | 12:39:04 | 12.969  | 7.449      | 7.82       | 33.13      | 22.1      |
| 12/5/2018       | 12:40:04 | 12.898  | 7.571      | 3.61       | 33.47      | 22.3      |
| 12/5/2018       | 12:41:04 | 13.013  | 7.597      | 8.03       | 33.93      | 27.7      |
| 12/5/2018       | 12:42:04 | 13.177  | 7.322      | 8.31       | 33.39      | 26.6      |
| 12/5/2018       | 12:43:04 | 13.118  | 7.358      | 4.19       | 32.48      | 40.6      |
| 12/5/2018       | 12:44:04 | 13.155  | 7.344      | 8.78       | 32.55      | 36.6      |
| 12/5/2018       | 12:45:05 | 13.142  | 7.407      | 3.7        | 32.94      | 20.6      |
| 12/5/2018       | 12:46:04 | 13.151  | 7.358      | 7.59       | 33.22      | 25.1      |
| 12/5/2018       | 12:47:04 | 13.299  | 7.293      | 8.04       | 33.21      | 18.2      |
| 12/5/2018       | 12:48:04 | 13.34   | 7.159      | 3.82       | 32.68      | 27.9      |
| 12/5/2018       | 12:49:04 | 13.425  | 7.139      | 8.79       | 31.98      | 32.4      |
| 12/5/2018       | 12:50:04 | 13.417  | 7.127      | 4.06       | 31.32      | 41.8      |
| 12/5/2018       | 12:51:04 | 13.501  | 7.052      | 7.41       | 31.33      | 43.2      |
| 12/5/2018       | 12:52:04 | 13.325  | 7.141      | 6.96       | 31.41      | 20.4      |
| 12/5/2018       | 12:53:04 | 13.333  | 7.165      | 3.2        | 31.09      | 28.8      |
| 12/5/2018       | 12:54:04 | 13.292  | 7.225      | 8.24       | 31.25      | 21.3      |
| 12/5/2018       | 12:55:04 | 13.328  | 7.147      | 3.83       | 31.39      | 30.8      |
| 12/5/2018       | 12:56:05 | 13.318  | 7.194      | 8.74       | 31.37      | 39.7      |
| 12/5/2018       | 12:57:05 | 13.271  | 7.166      | 8.38       | 31.51      | 36.1      |
| 12/5/2018       | 12:58:04 | 13.497  | 7.139      | 3.57       | 31.57      | 35        |
| 12/5/2018       | 12:59:04 | 13.509  | 6.971      | 7.93       | 31.2       | 18.1      |

Run 3

Operator: David Goshaw

Plant Name: Enviva Greenwood

Location: Dryer Stack

|                |              | O2<br>% | CO2<br>ppm | THC<br>ppm | NOx<br>ppm | CO<br>ppm |
|----------------|--------------|---------|------------|------------|------------|-----------|
| 12/5/2018      | 13:00:04     | 13.351  | 7.101      | 3.1        | 31.13      | 21.6      |
| 12/5/2018      | 13:01:04     | 13.393  | 7.223      | 7.42       | 31.86      | 24        |
| 12/5/2018      | 13:02:04     | 13.399  | 7.111      | 7.6        | 31.84      | 28.6      |
| 12/5/2018      | 13:03:04     | 13.571  | 6.997      | 3.75       | 31.03      | 41.7      |
| 12/5/2018      | 13:04:04     | 13.54   | 6.966      | 8.28       | 30.48      | 38.3      |
| 12/5/2018      | 13:05:04     | 13.58   | 6.93       | 2.9        | 30.2       | 30.9      |
| 12/5/2018      | 13:06:04     | 13.453  | 7.015      | 7.25       | 30.3       | 23.3      |
| Pause          |              |         |            |            |            |           |
| 12/5/2018      | 13:07:04     | 13.33   | 7.095      | 7.05       | 30.61      | 21.9      |
| 12/5/2018      | 13:08:03     | 16.184  | 5.822      | 3.1        | 28.53      | 26.3      |
| 12/5/2018      | 13:09:03     | 13.525  | 5.788      | 8.07       | 24.74      | 28.5      |
| End Pause      |              |         |            |            |            |           |
| 12/5/2018      | 13:10:03     | 13.542  | 6.999      | 3.71       | 30.96      | 36        |
| 12/5/2018      | 13:11:05     | 13.659  | 6.885      | 8.51       | 29.67      | 36.9      |
| 12/5/2018      | 13:12:05     | 13.795  | 6.833      | 7.58       | 29.35      | 19.5      |
| 12/5/2018      | 13:13:04     | 13.747  | 6.766      | 3.67       | 28.97      | 21        |
| 12/5/2018      | 13:14:04     | 13.806  | 6.792      | 7.9        | 29.01      | 18.6      |
| 12/5/2018      | 13:15:04     | 13.953  | 6.605      | 3.06       | 29.04      | 26.8      |
| 12/5/2018      | 13:16:04     | 13.918  | 6.643      | 8.95       | 28.7       | 30.4      |
| 12/5/2018      | 13:17:04     | 13.934  | 6.593      | 7.97       | 28.44      | 33.5      |
| 12/5/2018      | 13:18:04     | 13.886  | 6.645      | 3.78       | 28.17      | 30.6      |
| 12/5/2018      | 13:19:04     | 13.761  | 6.746      | 7.78       | 28.26      | 15.6      |
| 12/5/2018      | 13:20:04     | 13.517  | 6.921      | 2.74       | 29.7       | 17.7      |
| 12/5/2018      | 13:21:04     | 13.509  | 7.085      | 7.73       | 29.98      | 19        |
| 12/5/2018      | 13:22:04     | 13.494  | 7.038      | 7.33       | 28.83      | 24.5      |
| 12/5/2018      | 13:23:04     | 13.564  | 6.945      | 3.62       | 29.04      | 32.7      |
| 12/5/2018      | 13:24:04     | 13.39   | 7.103      | 8.23       | 29.02      | 33.4      |
| 12/5/2018      | 13:25:04     | 13.404  | 7.076      | 2.48       | 30.82      | 24.8      |
| 12/5/2018      | 13:26:04     | 13.417  | 7.108      | 7.57       | 31.62      | 17.5      |
| 12/5/2018      | 13:27:04     | 13.22   | 7.23       | 7.05       | 31.57      | 17.6      |
| Average        | 3044 samples | 13.397  | 7.119      | 6.14       | 31.52      | 28.9      |
| Test Run 6 End |              |         |            |            |            |           |

| Date                                                              | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCI<br>(ppm) | SEC<br>(ppm) | Methanol<br>(ppm) | SEC<br>(ppm) | acet-<br>aldehyde<br>(ppm) | SEC<br>(ppm) |
|-------------------------------------------------------------------|----------------------------|--------------|--------------|--------------|-------------------|--------------|----------------------------|--------------|
| 0840-0947                                                         | 0.585                      | 0.109        | 0.000        | 0.132        | 0.022             | 1.154        | 0.015                      | 0.441        |
| 1047-1157                                                         | 0.600                      | 0.086        | 0.000        | 0.100        | 0.034             | 1.067        | 0.000                      | 0.423        |
| 1216-1327                                                         | 0.560                      | 0.073        | 0.000        | 0.089        | 0.058             | 1.014        | 0.000                      | 0.340        |
| Note: Shaded indicates conc.< 2 x SEC, and is a none-detect value |                            |              |              |              |                   |              |                            |              |
| 12/5/2018 8:09                                                    | 0.919                      | 0.096        | 0.441        | 0.115        | 0.164             | 1.111        | 0.000                      | 0.380        |
| 12/5/2018 8:10                                                    | 0.485                      | 0.095        | 0.000        | 0.113        | 0.000             | 1.120        | 0.000                      | 0.372        |
| 12/5/2018 8:11                                                    | 0.731                      | 0.105        | 0.000        | 0.124        | 0.000             | 1.156        | 0.000                      | 0.404        |
| 12/5/2018 8:12                                                    | 0.886                      | 0.107        | 0.000        | 0.126        | 0.000             | 1.169        | 0.000                      | 0.413        |
| 12/5/2018 8:13                                                    | 0.386                      | 0.106        | 0.000        | 0.126        | 0.000             | 1.163        | 0.000                      | 0.416        |
| 12/5/2018 8:14                                                    | 1.023                      | 0.105        | 0.000        | 0.124        | 0.000             | 1.143        | 0.000                      | 0.400        |
| 12/5/2018 8:15                                                    | 0.569                      | 0.108        | 0.000        | 0.124        | 0.000             | 1.174        | 0.000                      | 0.417        |
| 12/5/2018 8:16                                                    | 0.603                      | 0.112        | 0.000        | 0.130        | 0.000             | 1.163        | 0.000                      | 0.431        |
| 12/5/2018 8:17                                                    | 0.766                      | 0.107        | 0.000        | 0.126        | 0.000             | 1.162        | 0.000                      | 0.414        |
| 12/5/2018 8:18                                                    | 0.325                      | 0.109        | 0.000        | 0.131        | 0.000             | 1.165        | 0.000                      | 0.429        |
| 12/5/2018 8:19                                                    | 0.955                      | 0.113        | 0.000        | 0.138        | 0.006             | 1.153        | 0.000                      | 0.454        |
| 12/5/2018 8:20                                                    | 0.490                      | 0.113        | 0.000        | 0.136        | 0.000             | 1.144        | 0.000                      | 0.449        |
| 12/5/2018 8:21                                                    | 0.688                      | 0.114        | 0.000        | 0.136        | 0.000             | 1.144        | 0.000                      | 0.451        |
| 12/5/2018 8:22                                                    | 0.856                      | 0.119        | 0.000        | 0.140        | 0.001             | 1.164        | 0.000                      | 0.477        |
| 12/5/2018 8:23                                                    | 0.285                      | 0.118        | 0.000        | 0.140        | 0.000             | 1.181        | 0.000                      | 0.459        |
| 12/5/2018 8:24                                                    | 0.808                      | 0.118        | 0.000        | 0.137        | 0.000             | 1.152        | 0.000                      | 0.465        |
| 12/5/2018 8:25                                                    | 0.468                      | 0.119        | 0.000        | 0.140        | 0.000             | 1.161        | 0.000                      | 0.473        |
| 12/5/2018 8:26                                                    | 0.708                      | 0.122        | 0.000        | 0.144        | 0.000             | 1.157        | 0.000                      | 0.493        |
| 12/5/2018 8:27                                                    | 0.943                      | 0.115        | 0.000        | 0.139        | 0.000             | 1.135        | 0.000                      | 0.458        |
| 12/5/2018 8:28                                                    | 0.481                      | 0.120        | 0.000        | 0.144        | 0.000             | 1.143        | 0.000                      | 0.480        |
| 12/5/2018 8:29                                                    | 0.929                      | 0.117        | 0.000        | 0.143        | 0.000             | 1.169        | 0.000                      | 0.466        |
| 12/5/2018 8:30                                                    | 0.488                      | 0.121        | 0.000        | 0.143        | 0.000             | 1.167        | 0.000                      | 0.486        |
| 12/5/2018 8:31                                                    | 0.587                      | 0.124        | 0.000        | 0.148        | 0.000             | 1.174        | 0.000                      | 0.498        |
| 12/5/2018 8:32                                                    | 0.765                      | 0.119        | 0.000        | 0.144        | 0.018             | 1.192        | 0.000                      | 0.478        |
| 12/5/2018 8:33                                                    | 0.313                      | 0.115        | 0.000        | 0.138        | 0.000             | 1.171        | 0.000                      | 0.460        |
| 12/5/2018 8:34                                                    | 0.917                      | 0.123        | 0.000        | 0.144        | 0.035             | 1.175        | 0.000                      | 0.488        |
| 12/5/2018 8:35                                                    | 0.515                      | 0.118        | 0.000        | 0.140        | 0.000             | 1.177        | 0.000                      | 0.469        |
| 12/5/2018 8:36                                                    | 0.529                      | 0.123        | 0.000        | 0.146        | 0.000             | 1.175        | 0.000                      | 0.485        |
| 12/5/2018 8:37                                                    | 0.760                      | 0.118        | 0.000        | 0.141        | 0.001             | 1.175        | 0.000                      | 0.473        |
| 12/5/2018 8:38                                                    | 0.306                      | 0.116        | 0.000        | 0.140        | 0.000             | 1.166        | 0.000                      | 0.471        |
| 12/5/2018 8:39                                                    | 0.944                      | 0.119        | 0.000        | 0.142        | 0.039             | 1.153        | 0.000                      | 0.479        |
| 12/5/2018 8:40                                                    | 0.595                      | 0.122        | 0.000        | 0.146        | 0.000             | 1.166        | 0.000                      | 0.486        |
| 12/5/2018 8:41                                                    | 0.672                      | 0.123        | 0.000        | 0.146        | 0.000             | 1.160        | 0.000                      | 0.488        |
| 12/5/2018 8:42                                                    | 0.907                      | 0.119        | 0.000        | 0.142        | 0.000             | 1.144        | 0.000                      | 0.473        |
| 12/5/2018 8:43                                                    | 0.203                      | 0.118        | 0.000        | 0.143        | 0.000             | 1.162        | 0.000                      | 0.471        |
| 12/5/2018 8:44                                                    | 0.824                      | 0.118        | 0.000        | 0.141        | 0.070             | 1.178        | 0.000                      | 0.471        |
| 12/5/2018 8:45                                                    | 0.481                      | 0.115        | 0.000        | 0.140        | 0.000             | 1.176        | 0.000                      | 0.473        |
| 12/5/2018 8:46                                                    | 0.553                      | 0.117        | 0.000        | 0.139        | 0.000             | 1.158        | 0.000                      | 0.475        |
| 12/5/2018 8:47                                                    | 0.841                      | 0.117        | 0.000        | 0.139        | 0.053             | 1.174        | 0.000                      | 0.471        |
| 12/5/2018 8:48                                                    | 0.322                      | 0.113        | 0.000        | 0.133        | 0.000             | 1.173        | 0.000                      | 0.457        |
| 12/5/2018 8:49                                                    | 0.826                      | 0.115        | 0.000        | 0.135        | 0.057             | 1.160        | 0.000                      | 0.460        |
| 12/5/2018 8:50                                                    | 0.474                      | 0.119        | 0.000        | 0.142        | 0.000             | 1.189        | 0.000                      | 0.478        |
| 12/5/2018 8:51                                                    | 0.514                      | 0.116        | 0.000        | 0.142        | 0.000             | 1.194        | 0.000                      | 0.467        |
| 12/5/2018 8:52                                                    | 0.833                      | 0.119        | 0.000        | 0.144        | 0.075             | 1.184        | 0.000                      | 0.473        |
| 12/5/2018 8:53                                                    | 0.366                      | 0.115        | 0.000        | 0.138        | 0.000             | 1.161        | 0.000                      | 0.468        |
| 12/5/2018 8:54                                                    | 0.964                      | 0.115        | 0.000        | 0.137        | 0.034             | 1.166        | 0.000                      | 0.462        |
| 12/5/2018 8:55                                                    | 0.632                      | 0.115        | 0.000        | 0.137        | 0.000             | 1.156        | 0.000                      | 0.464        |
| 12/5/2018 8:56                                                    | 0.518                      | 0.116        | 0.000        | 0.141        | 0.000             | 1.148        | 0.000                      | 0.465        |

| Date           | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCI<br>(ppm) | SEC<br>(ppm) | Methanol<br>(ppm) | SEC<br>(ppm) | acet-<br>aldehyde<br>(ppm) | SEC<br>(ppm) |
|----------------|----------------------------|--------------|--------------|--------------|-------------------|--------------|----------------------------|--------------|
| 12/5/2018 8:57 | 0.849                      | 0.114        | 0.000        | 0.138        | 0.059             | 1.162        | 0.000                      | 0.456        |
| 12/5/2018 8:58 | 0.267                      | 0.115        | 0.000        | 0.137        | 0.000             | 1.176        | 0.000                      | 0.464        |
| 12/5/2018 8:59 | 0.794                      | 0.117        | 0.000        | 0.137        | 0.037             | 1.168        | 0.000                      | 0.469        |
| 12/5/2018 9:00 | 0.470                      | 0.114        | 0.000        | 0.141        | 0.000             | 1.160        | 0.000                      | 0.460        |
| 12/5/2018 9:01 | 0.609                      | 0.109        | 0.000        | 0.131        | 0.000             | 1.157        | 0.000                      | 0.447        |
| 12/5/2018 9:02 | 0.901                      | 0.111        | 0.000        | 0.135        | 0.084             | 1.161        | 0.000                      | 0.449        |
| 12/5/2018 9:03 | 0.249                      | 0.110        | 0.000        | 0.131        | 0.000             | 1.149        | 0.000                      | 0.443        |
| 12/5/2018 9:04 | 0.789                      | 0.111        | 0.000        | 0.134        | 0.000             | 1.146        | 0.000                      | 0.445        |
| 12/5/2018 9:05 | 0.545                      | 0.108        | 0.000        | 0.129        | 0.000             | 1.141        | 0.000                      | 0.428        |
| 12/5/2018 9:06 | 0.602                      | 0.107        | 0.000        | 0.131        | 0.000             | 1.130        | 0.000                      | 0.426        |
| 12/5/2018 9:07 | 0.884                      | 0.104        | 0.000        | 0.125        | 0.017             | 1.145        | 0.000                      | 0.422        |
| 12/5/2018 9:08 | 0.411                      | 0.110        | 0.000        | 0.136        | 0.000             | 1.155        | 0.000                      | 0.436        |
| 12/5/2018 9:09 | 0.879                      | 0.108        | 0.000        | 0.131        | 0.074             | 1.151        | 0.000                      | 0.426        |
| 12/5/2018 9:10 | 0.543                      | 0.108        | 0.000        | 0.133        | 0.000             | 1.147        | 0.000                      | 0.431        |
| 12/5/2018 9:11 | 0.554                      | 0.056        | 0.000        | 0.068        | 0.197             | 0.400        | 1.037                      | 0.240        |
| 12/5/2018 9:12 | 0.681                      | 0.095        | 0.000        | 0.111        | 0.139             | 1.135        | 0.000                      | 0.379        |
| 12/5/2018 9:13 | 0.193                      | 0.097        | 0.000        | 0.120        | 0.000             | 1.164        | 0.000                      | 0.408        |
| 12/5/2018 9:14 | 0.749                      | 0.102        | 0.000        | 0.121        | 0.072             | 1.145        | 0.000                      | 0.416        |
| 12/5/2018 9:15 | 0.478                      | 0.101        | 0.000        | 0.118        | 0.000             | 1.147        | 0.000                      | 0.405        |
| 12/5/2018 9:16 | 0.464                      | 0.098        | 0.000        | 0.118        | 0.000             | 1.156        | 0.000                      | 0.406        |
| 12/5/2018 9:17 | 0.754                      | 0.104        | 0.000        | 0.125        | 0.040             | 1.154        | 0.000                      | 0.413        |
| 12/5/2018 9:18 | 0.233                      | 0.102        | 0.000        | 0.126        | 0.000             | 1.148        | 0.000                      | 0.417        |
| 12/5/2018 9:19 | 0.823                      | 0.111        | 0.000        | 0.136        | 0.033             | 1.154        | 0.000                      | 0.446        |
| 12/5/2018 9:20 | 0.472                      | 0.104        | 0.000        | 0.125        | 0.000             | 1.165        | 0.000                      | 0.422        |
| 12/5/2018 9:21 | 0.617                      | 0.109        | 0.000        | 0.133        | 0.000             | 1.154        | 0.000                      | 0.431        |
| 12/5/2018 9:22 | 0.765                      | 0.104        | 0.000        | 0.125        | 0.026             | 1.159        | 0.000                      | 0.415        |
| 12/5/2018 9:23 | 0.130                      | 0.104        | 0.000        | 0.126        | 0.000             | 1.148        | 0.000                      | 0.417        |
| 12/5/2018 9:24 | 0.743                      | 0.113        | 0.000        | 0.135        | 0.000             | 1.157        | 0.000                      | 0.446        |
| 12/5/2018 9:25 | 0.480                      | 0.114        | 0.000        | 0.139        | 0.000             | 1.196        | 0.000                      | 0.448        |
| 12/5/2018 9:26 | 0.488                      | 0.109        | 0.000        | 0.130        | 0.000             | 1.175        | 0.000                      | 0.436        |
| 12/5/2018 9:27 | 0.906                      | 0.110        | 0.000        | 0.132        | 0.050             | 1.177        | 0.000                      | 0.440        |
| 12/5/2018 9:28 | 0.431                      | 0.109        | 0.000        | 0.133        | 0.000             | 1.173        | 0.000                      | 0.445        |
| 12/5/2018 9:29 | 1.054                      | 0.107        | 0.000        | 0.130        | 0.080             | 1.158        | 0.000                      | 0.437        |
| 12/5/2018 9:30 | 0.636                      | 0.106        | 0.000        | 0.127        | 0.000             | 1.143        | 0.000                      | 0.436        |
| 12/5/2018 9:31 | 0.564                      | 0.106        | 0.000        | 0.132        | 0.000             | 1.157        | 0.000                      | 0.440        |
| 12/5/2018 9:32 | 0.762                      | 0.110        | 0.000        | 0.135        | 0.040             | 1.156        | 0.000                      | 0.436        |
| 12/5/2018 9:33 | 0.135                      | 0.111        | 0.000        | 0.132        | 0.000             | 1.153        | 0.000                      | 0.439        |
| 12/5/2018 9:34 | 0.768                      | 0.106        | 0.000        | 0.127        | 0.038             | 1.149        | 0.000                      | 0.425        |
| 12/5/2018 9:35 | 0.439                      | 0.111        | 0.000        | 0.134        | 0.000             | 1.169        | 0.000                      | 0.443        |
| 12/5/2018 9:36 | 0.371                      | 0.110        | 0.000        | 0.132        | 0.000             | 1.181        | 0.000                      | 0.444        |
| 12/5/2018 9:37 | 0.613                      | 0.107        | 0.000        | 0.128        | 0.055             | 1.164        | 0.000                      | 0.423        |
| 12/5/2018 9:38 | 0.143                      | 0.107        | 0.000        | 0.129        | 0.000             | 1.183        | 0.000                      | 0.426        |
| 12/5/2018 9:39 | 0.777                      | 0.115        | 0.000        | 0.139        | 0.032             | 1.191        | 0.000                      | 0.457        |
| 12/5/2018 9:40 | 0.543                      | 0.112        | 0.000        | 0.136        | 0.000             | 1.185        | 0.000                      | 0.446        |
| 12/5/2018 9:41 | 0.563                      | 0.109        | 0.000        | 0.131        | 0.000             | 1.164        | 0.000                      | 0.441        |
| 12/5/2018 9:42 | 0.854                      | 0.112        | 0.000        | 0.136        | 0.056             | 1.171        | 0.000                      | 0.443        |
| 12/5/2018 9:43 | 0.237                      | 0.113        | 0.000        | 0.141        | 0.000             | 1.157        | 0.000                      | 0.459        |
| 12/5/2018 9:44 | 0.802                      | 0.110        | 0.000        | 0.132        | 0.077             | 1.161        | 0.000                      | 0.448        |
| 12/5/2018 9:45 | 0.522                      | 0.108        | 0.000        | 0.133        | 0.000             | 1.173        | 0.000                      | 0.447        |
| 12/5/2018 9:46 | 0.535                      | 0.113        | 0.000        | 0.137        | 0.000             | 1.163        | 0.000                      | 0.465        |
| 12/5/2018 9:47 | 0.192                      | 0.083        | 0.000        | 0.103        | 0.000             | 1.416        | 0.000                      | 0.365        |

| Date    | Time | CTS Scan<br>(pathlength) | SEC<br>(ppm) | Cell<br>Pressure<br>(psi) | Cell<br>Temp<br>(deg C) | Deviation<br>from<br>Previous | Deviation<br>from<br>Average |
|---------|------|--------------------------|--------------|---------------------------|-------------------------|-------------------------------|------------------------------|
| 5-Dec   | 736  | 8.03                     | 0.113        | 14.490                    | 181                     | NA                            | 0.1%                         |
| 5-Dec   | 1403 | 8.055                    | 0.115        | 14.43                     | 181                     | -0.3%                         | -0.1%                        |
| Average |      | 8.045                    | 0.114        |                           |                         |                               |                              |

## Stratification Test

| Point                       | Average Reading |      |      |       |       | Variation from Mean |              |              |
|-----------------------------|-----------------|------|------|-------|-------|---------------------|--------------|--------------|
|                             | O2              | CO2  |      | NOx   |       | O2                  | CO2          | NOx          |
| 1                           | 14.25           | 6.73 | 7.35 | 29.42 | 13.90 | 0.16                | 0.19         | 0.06         |
| 2                           | 14.12           | 6.87 | 7.91 | 29.32 | 14.43 | 0.03                | 0.05         | 0.04         |
| 3                           | 14.05           | 6.96 | 7.02 | 29.55 | 14.40 | 0.04                | 0.04         | 0.19         |
| 4                           | 13.94           | 7.07 | 7.46 | 29.60 | 22.97 | 0.15                | 0.16         | 0.24         |
| 5                           | 14.08           | 6.95 | 7.65 | 28.91 | 11.67 | 0.00                | 0.03         | 0.45         |
| 6                           |                 |      |      |       |       |                     |              |              |
| 7                           |                 |      |      |       |       |                     |              |              |
| 8                           |                 |      |      |       |       |                     |              |              |
| 9                           |                 |      |      |       |       |                     |              |              |
| 10                          |                 |      |      |       |       |                     |              |              |
| 11                          |                 |      |      |       |       |                     |              |              |
| 12                          |                 |      |      |       |       |                     |              |              |
| Mean                        | 14.09           | 6.91 | 7.48 | 29.36 | 15.47 |                     |              |              |
| Maximum Variation From Mean |                 |      |      |       |       | 0.2                 | 0.2          | 0.5          |
| Percent of Mean             |                 |      |      |       |       | 1.16                | 2.72         | 1.53         |
| Result                      |                 |      |      |       |       | Unstratified        | Unstratified | Unstratified |

Specifications (%)

|            |                                                 |
|------------|-------------------------------------------------|
| ≤5         | Unstratified (single point testing)             |
| >5 and ≤10 | Minimally Stratified (3-point testing required) |
| >10        | Stratified (12-point testing required)          |



| Enviva                    |                                        | DHM Exhaust |           |           |         |
|---------------------------|----------------------------------------|-------------|-----------|-----------|---------|
| Parameters                | Units                                  | Run 1       | Run 2     | Run 3     | Average |
| Date                      |                                        | 4-Dec-18    | 4-Dec-18  | 4-Dec-18  |         |
| Run Time                  |                                        | 0915-1023   | 1118-1225 | 1304-1412 |         |
| Oxygen                    | %                                      | 20.97       | 20.94     | 20.91     | 20.94   |
| Moisture                  | %                                      | 3.94        | 4.22      | 4.33      | 4.17    |
| Volumetric Flow Rate, Std | DSCFM                                  | 62,212      | 64,491    | 64,891    | 63,865  |
| Dryer Process Rate        | ODT/hr                                 | 65.4        | 64.9      | 64.6      | 65.0    |
| VOC Emissions             | Units                                  | Run 1       | Run 2     | Run 3     | Average |
| Concentration (actual)    | ppmv <sub>w</sub> as C <sub>3</sub>    | 65.6        | 83.8      | 82.3      | 77.2    |
| Concentration (dry)       | ppmv <sub>d</sub> as C <sub>3</sub>    | 68.3        | 87.5      | 86.1      | 80.6    |
| Emission Rate (propane)   | lb/hr as C <sub>3</sub> H <sub>8</sub> | 29.2        | 38.8      | 38.4      | 35.4    |
| Emission Factor (propane) | lb/ODT                                 | 0.45        | 0.60      | 0.59      | 0.55    |

Facility: Enviva  
Date: 12/4/18

Source: DHM Exhaust

| HAP                   |         | Methanol           | Acet-aldehyde       | Form-aldehyde     | HCl     |                 |
|-----------------------|---------|--------------------|---------------------|-------------------|---------|-----------------|
| Formula               |         | CH <sub>3</sub> OH | CH <sub>3</sub> CHO | CH <sub>2</sub> O | HCl     |                 |
| Mol Weight lb/lb mole |         | 32.04              | 44.05               | 30.31             | 36.46   |                 |
| <b>Run 1</b>          |         |                    |                     |                   |         |                 |
| Conc                  | ppm wet | 0.77               | 0.00                | 0.15              | 0.12    |                 |
| Conc                  | ppm dry | 0.80               | 0.00                | 0.15              | 0.13    | 3.94 % Moisture |
| Mass Emissions        | lb/hr   | 0.25               | 0.00                | 0.045             | 0.046   | 62,212 DSCFM    |
| Emission Factor       | lb/ODT  | 0.0038             | 0.00                | 0.00068           | 0.00070 | 65.4 ODT/hr     |
| <b>Run 2</b>          |         |                    |                     |                   |         |                 |
| Conc                  | ppm wet | 1.07               | 0.00                | 0.00              | 0.00    |                 |
| Conc                  | ppm dry | 1.11               | 0.00                | 0.00              | 0.00    | 4.22 % Moisture |
| Mass Emissions        | lb/hr   | 0.36               | 0.00                | 0.00              | 0.00    | 64,491 DSCFM    |
| Emission Factor       | lb/ODT  | 0.0055             | 0.00                | 0.00              | 0.00    | 64.9 ODT/hr     |
| <b>Run 3</b>          |         |                    |                     |                   |         |                 |
| Conc                  | ppm wet | 1.04               | 0.00                | 0.00              | 0.00    |                 |
| Conc                  | ppm dry | 1.08               | 0.00                | 0.00              | 0.00    | 4.33 % Moisture |
| Mass Emissions        | lb/hr   | 0.35               | 0.00                | 0.00              | 0.00    | 64,891 DSCFM    |
| Emission Factor       | lb/ODT  | 0.0054             | 0.00                | 0.00              | 0.00    | 64.6 ODT/hr     |
| <b>Averages</b>       |         |                    |                     |                   |         |                 |
| Conc                  | ppm wet | 0.96               | 0.00                | 0.05              | 0.04    |                 |
| Conc                  | ppm dry | 1.00               | 0.00                | 0.05              | 0.04    | 4.17 % Moisture |
| Mass Emissions        | lb/hr   | 0.32               | 0.00                | 0.015             | 0.015   | 63,865 DSCFM    |
| Emission Factor       | lb/ODT  | 0.0049             | 0.00                | 0.00023           | 0.00023 |                 |
| ND values             |         |                    |                     |                   |         |                 |

Enviva  
DHM Exhaust

Date: 4-Dec-18  
Run Time: 0915-1023

Run 1

| Parameter                                                     | Symbol                 | O <sub>2</sub><br>% | CO <sub>2</sub><br>% | THC<br>ppm (as C <sub>3</sub> H <sub>8</sub> ) |
|---------------------------------------------------------------|------------------------|---------------------|----------------------|------------------------------------------------|
| <b>Analyzer Calibration Error - Calibration Standards</b>     |                        |                     |                      |                                                |
| Zero Gas                                                      | $C_{v, zero}$          | 0.0                 | 0.0                  | 0.0                                            |
| Low-Level Gas                                                 | $C_{v, low}$           | N/A                 | N/A                  | 30.07                                          |
| Mid-Level Gas                                                 | $C_{v, mid}$           | 11.05               | 9.952                | 52.38                                          |
| High-Level Gas                                                | $C_{v, high}$          | 21.99               | 18.22                | 85.84                                          |
| Calibration Span                                              | CS                     | 21.99               | 18.22                | 175                                            |
| <b>Analyzer Calibration Error - Instrument Response</b>       |                        |                     |                      |                                                |
| Zero Gas                                                      | $C_{Dir, zero}$        | 0.02                | 0.12                 | 0.1                                            |
| Low-Level Gas                                                 | $C_{Dir, low}$         | N/A                 | N/A                  | 30.1                                           |
| Mid-Level Gas                                                 | $C_{Dir, mid}$         | 11.083              | 10                   | 52.37                                          |
| High-Level Gas                                                | $C_{Dir, high}$        | 22.02               | 18.23                | 85.5                                           |
| <b>Analyzer Calibration Error - Results (Percent of Span)</b> |                        |                     |                      |                                                |
| Zero Gas                                                      | $ACE_{zero}$           | 0.1                 | 0.7                  | 0.1                                            |
| Low-Level Gas                                                 | $ACE_{low}$            | N/A                 | N/A                  | 0.1                                            |
| Mid-Level Gas                                                 | $ACE_{mid}$            | 0.2                 | 0.3                  | 0.0                                            |
| High-Level Gas                                                | $ACE_{high}$           | 0.1                 | 0.1                  | -0.2                                           |
| Specification                                                 | $ACE_{spec}$           | ±2                  | ±2                   | ±5                                             |
| <b>System Calibrations - Instrument Response</b>              |                        |                     |                      |                                                |
| Initial Zero                                                  | $C_{s, zero (pre)}$    | 0.36                | 0.11                 | 0.1                                            |
| Final Zero                                                    | $C_{s, zero (post)}$   | 0.14                | 0.12                 | -0.17                                          |
| Upscale Gas Standard                                          | $C_{MA}$               | 21.99               | 18.22                | 52.4                                           |
| Initial Upscale                                               | $C_{v, up (pre)}$      | 21.905              | 18.20                | 52.37                                          |
| Final Upscale                                                 | $C_{v, up (post)}$     | 21.987              | 18.26                | 51.37                                          |
| <b>System Bias - Results (Percent)</b>                        |                        |                     |                      |                                                |
| Zero (pre)                                                    | $SB_i (zero)$          | 1.5                 | -0.1                 | 0.0                                            |
| Zero (post)                                                   | $SB_{final} (zero)$    | 0.6                 | 0.0                  | -0.2                                           |
| Upscale (pre)                                                 | $SB_i (upscale)$       | -0.5                | -0.2                 | 0.0                                            |
| Upscale (post)                                                | $SB_{final} (upscale)$ | -0.2                | 0.2                  | -0.6                                           |
| Specification                                                 | $SB_{spec}$            | ±5                  | ±5                   | NA                                             |
| <b>System Drift - Results (Percent)</b>                       |                        |                     |                      |                                                |
| Zero                                                          | $D_{zero}$             | 1.0                 | 0.1                  | -0.2                                           |
| Upscale                                                       | $D_{upscale}$          | 0.4                 | 0.3                  | -0.6                                           |
| Specification                                                 | $D_{spec}$             | ±3                  | 3.0                  | ±3                                             |
| <b>Response Test - Results (seconds)</b>                      |                        |                     |                      |                                                |
| Upscale Test                                                  |                        | 30                  | 35                   | NA                                             |
| Zero Test                                                     |                        | 30                  | 35                   | NA                                             |
| Response Time                                                 |                        | 30                  | 35                   | 30                                             |
| <b>Calibration Correction</b>                                 |                        |                     |                      |                                                |
| Raw Average                                                   | $C_{ave}$              | 20.94               | 0.12                 | 65.6                                           |
| Bias Average - Zero                                           | $C_0$                  | 0.25                | 0.12                 | N/A                                            |
| Bias Average - Upscale                                        | $C_M$                  | 21.95               | 18.23                | N/A                                            |
| Corrected Run Average                                         | $C_{Gas}$              | 20.97               | 0.00                 | 65.6                                           |

Enviva  
DHM Exhaust

Date: 4-Dec-18  
Run Time: 1118-1225

Run 2

| Parameter                                                     | Symbol                 | O <sub>2</sub><br>% | CO <sub>2</sub><br>% | THC<br>ppm (as C <sub>3</sub> H <sub>8</sub> ) |
|---------------------------------------------------------------|------------------------|---------------------|----------------------|------------------------------------------------|
| <b>Analyzer Calibration Error - Calibration Standards</b>     |                        |                     |                      |                                                |
| Zero Gas                                                      | $C_{v, zero}$          | 0.0                 | 0.0                  | 0.0                                            |
| Low-Level Gas                                                 | $C_{v, low}$           | N/A                 | N/A                  | 30.07                                          |
| Mid-Level Gas                                                 | $C_{v, mid}$           | 11.1                | 10.0                 | 52.38                                          |
| High-Level Gas                                                | $C_{v, high}$          | 22.0                | 18.2                 | 85.84                                          |
| Calibration Span                                              | CS                     | 22.0                | 18.2                 | 175                                            |
| <b>Analyzer Calibration Error - Instrument Response</b>       |                        |                     |                      |                                                |
| Zero Gas                                                      | $C_{Dir, zero}$        | 0.0                 | 0.1                  | 0.1                                            |
| Low-Level Gas                                                 | $C_{Dir, low}$         | N/A                 | N/A                  | 30.1                                           |
| Mid-Level Gas                                                 | $C_{Dir, mid}$         | 11.1                | 10.0                 | 52.4                                           |
| High-Level Gas                                                | $C_{Dir, high}$        | 22.0                | 18.2                 | 85.5                                           |
| <b>Analyzer Calibration Error - Results (Percent of Span)</b> |                        |                     |                      |                                                |
| Zero Gas                                                      | $ACE_{zero}$           | 0.1                 | 0.7                  | 0.1                                            |
| Low-Level Gas                                                 | $ACE_{low}$            | N/A                 | N/A                  | 0.1                                            |
| Mid-Level Gas                                                 | $ACE_{mid}$            | 0.2                 | 0.3                  | 0.0                                            |
| High-Level Gas                                                | $ACE_{high}$           | 0.1                 | 0.1                  | -0.2                                           |
| Specification                                                 | $ACE_{spec}$           | ±2                  | ±2                   | ±5                                             |
| <b>System Calibrations - Instrument Response</b>              |                        |                     |                      |                                                |
| Initial Zero                                                  | $C_{s, zero (pre)}$    | 0.14                | 0.12                 | -0.09                                          |
| Final Zero                                                    | $C_{s, zero (post)}$   | 0.187               | 0.13                 | 0.08                                           |
| Upscale Gas Standard                                          | $C_{MA}$               | 21.99               | 18.22                | 52.4                                           |
| Initial Upscale                                               | $C_{v, up (pre)}$      | 21.987              | 18.26                | 51.37                                          |
| Final Upscale                                                 | $C_{v, up (post)}$     | 21.995              | 18.263               | 51.46                                          |
| <b>System Bias - Results (Percent)</b>                        |                        |                     |                      |                                                |
| Zero (pre)                                                    | $SB_i (zero)$          | 0.6                 | 0.0                  | -0.1                                           |
| Zero (post)                                                   | $SB_{final} (zero)$    | 0.8                 | 0.0                  | 0.0                                            |
| Upscale (pre)                                                 | $SB_i (upscale)$       | -0.2                | 0.2                  | -0.6                                           |
| Upscale (post)                                                | $SB_{final} (upscale)$ | -0.1                | 0.2                  | -0.5                                           |
| Specification                                                 | $SB_{spec}$            | ±5                  | ±5                   | NA                                             |
| <b>System Drift - Results (Percent)</b>                       |                        |                     |                      |                                                |
| Zero                                                          | $D_{zero}$             | 0.2                 | 0.0                  | 0.1                                            |
| Upscale                                                       | $D_{upscale}$          | 0.0                 | 0.0                  | 0.1                                            |
| Specification                                                 | $D_{spec}$             | ±3                  | 3.0                  | ±3                                             |
| <b>Response Test - Results (seconds)</b>                      |                        |                     |                      |                                                |
| Upscale Test                                                  |                        | 30                  | 35                   | NA                                             |
| Zero Test                                                     |                        | 30                  | 35                   | NA                                             |
| Response Time                                                 |                        | 30                  | 35                   | 30                                             |
| <b>Calibration Correction</b>                                 |                        |                     |                      |                                                |
| Raw Average                                                   | $C_{ave}$              | 20.95               | 0.12                 | 83.79                                          |
| Bias Average - Zero                                           | $C_0$                  | 0.17                | 0.12                 | N/A                                            |
| Bias Average - Upscale                                        | $C_M$                  | 21.99               | 18.26                | N/A                                            |
| Corrected Run Average                                         | $C_{Gas}$              | <b>20.94</b>        | <b>-0.01</b>         | <b>83.8</b>                                    |

Enviva  
DHM Exhaust

Date: 4-Dec-18  
Run Time: 1304-1412

Run 3

| Parameter | Symbol | O <sub>2</sub><br>% | CO <sub>2</sub><br>% | THC<br>ppm (as C <sub>3</sub> H <sub>8</sub> ) |
|-----------|--------|---------------------|----------------------|------------------------------------------------|
|-----------|--------|---------------------|----------------------|------------------------------------------------|

#### Analyzer Calibration Error - Calibration Standards

|                  |               |       |       |       |
|------------------|---------------|-------|-------|-------|
| Zero Gas         | $C_{v, zero}$ | 0.0   | 0.0   | 0.0   |
| Low-Level Gas    | $C_{v, low}$  | N/A   | N/A   | 30.1  |
| Mid-Level Gas    | $C_{v, mid}$  | 11.1  | 10.0  | 52.4  |
| High-Level Gas   | $C_{v, high}$ | 22.0  | 18.2  | 85.8  |
| Calibration Span | CS            | 21.99 | 18.22 | 175.0 |

#### Analyzer Calibration Error - Instrument Response

|                |                 |      |      |      |
|----------------|-----------------|------|------|------|
| Zero Gas       | $C_{Dir, zero}$ | 0.0  | 0.1  | 0.10 |
| Low-Level Gas  | $C_{Dir, low}$  | N/A  | N/A  | 30.1 |
| Mid-Level Gas  | $C_{Dir, mid}$  | 11.1 | 10.0 | 52.4 |
| High-Level Gas | $C_{Dir, high}$ | 22.0 | 18.2 | 85.5 |

#### Analyzer Calibration Error - Results (Percent of Span)

|                |              |     |     |      |
|----------------|--------------|-----|-----|------|
| Zero Gas       | $ACE_{zero}$ | 0.1 | 0.7 | 0.1  |
| Low-Level Gas  | $ACE_{low}$  | N/A | N/A | 0.1  |
| Mid-Level Gas  | $ACE_{mid}$  | 0.2 | 0.3 | 0.0  |
| High-Level Gas | $ACE_{high}$ | 0.1 | 0.1 | -0.2 |
| Specification  | $ACE_{spec}$ | ±2  | ±2  | ±5   |

#### System Calibrations - Instrument Response

|                      |                      |        |        |       |
|----------------------|----------------------|--------|--------|-------|
| Initial Zero         | $C_{s, zero (pre)}$  | 0.19   | 0.13   | 0.08  |
| Final Zero           | $C_{s, zero (post)}$ | 0.23   | 0.16   | 0.47  |
| Upscale Gas Standard | $C_{MA}$             | 21.99  | 18.22  | 52.4  |
| Initial Upscale      | $C_{v, up (pre)}$    | 21.995 | 18.263 | 51.46 |
| Final Upscale        | $C_{v, up (post)}$   | 21.963 | 18.22  | 52.2  |

#### System Bias - Results (Percent)

|                |                        |      |      |      |
|----------------|------------------------|------|------|------|
| Zero (pre)     | $SB_i (zero)$          | 0.8  | 0.0  | 0.0  |
| Zero (post)    | $SB_{final} (zero)$    | 1.0  | 0.2  | 0.2  |
| Upscale (pre)  | $SB_i (upscale)$       | -0.1 | 0.2  | -0.5 |
| Upscale (post) | $SB_{final} (upscale)$ | -0.3 | -0.1 | -0.1 |
| Specification  | $SB_{spec}$            | ±5   | ±5   | NA   |

#### System Drift - Results (Percent)

|               |               |     |     |     |
|---------------|---------------|-----|-----|-----|
| Zero          | $D_{zero}$    | 0.2 | 0.2 | 0.2 |
| Upscale       | $D_{upscale}$ | 0.1 | 0.2 | 0.4 |
| Specification | $D_{spec}$    | ±3  | 3.0 | ±3  |

#### Response Test - Results (seconds)

|               |  |    |    |    |
|---------------|--|----|----|----|
| Upscale Test  |  | 30 | 35 | NA |
| Zero Test     |  | 30 | 35 | NA |
| Response Time |  | 30 | 35 | 30 |

#### Calibration Correction

|                        |           |              |             |             |
|------------------------|-----------|--------------|-------------|-------------|
| Raw Average            | $C_{ave}$ | 20.91        | 0.11        | 82.3        |
| Bias Average - Zero    | $C_o$     | 0.21         | 0.14        | N/A         |
| Bias Average - Upscale | $C_M$     | 21.98        | 18.24       | N/A         |
| Corrected Run Average  | $C_{Gas}$ | <b>20.91</b> | <b>0.11</b> | <b>82.3</b> |

Test Run 1 Begin. STRATA Version 3.2.112

Operator: David Goshaw

Plant Name: Enviva Greenwood

Location: DHM Stack

|                 |         |  | O2<br>% | CO2<br>ppm | THC<br>ppm | O2<br>Volts | CO2<br>Volts | THC<br>Volts |
|-----------------|---------|--|---------|------------|------------|-------------|--------------|--------------|
| Start Averaging |         |  |         |            |            |             |              |              |
| 12/4/2018       | 9:16:24 |  | 20.943  | 0.111      | 73.05      | 8.417       | 0.045        | 2.495        |
| 12/4/2018       | 9:17:24 |  | 20.944  | 0.112      | 60.56      | 8.418       | 0.045        | 2.079        |
| 12/4/2018       | 9:18:24 |  | 20.945  | 0.111      | 42.67      | 8.418       | 0.045        | 1.482        |
| 12/4/2018       | 9:19:25 |  | 20.95   | 0.114      | 35.82      | 8.42        | 0.045        | 1.254        |
| 12/4/2018       | 9:20:24 |  | 20.95   | 0.113      | 38.92      | 8.42        | 0.045        | 1.357        |
| 12/4/2018       | 9:21:24 |  | 20.951  | 0.113      | 45.73      | 8.421       | 0.045        | 1.584        |
| 12/4/2018       | 9:22:23 |  | 20.948  | 0.113      | 53.06      | 8.419       | 0.045        | 1.829        |
| 12/4/2018       | 9:23:24 |  | 20.949  | 0.112      | 60.15      | 8.419       | 0.045        | 2.065        |
| 12/4/2018       | 9:24:24 |  | 20.946  | 0.112      | 65.15      | 8.418       | 0.045        | 2.232        |
| 12/4/2018       | 9:25:24 |  | 20.948  | 0.112      | 69.73      | 8.419       | 0.045        | 2.384        |
| 12/4/2018       | 9:26:24 |  | 20.951  | 0.111      | 74.45      | 8.421       | 0.044        | 2.542        |
| 12/4/2018       | 9:27:24 |  | 20.951  | 0.11       | 76.45      | 8.42        | 0.044        | 2.608        |
| 12/4/2018       | 9:28:23 |  | 20.951  | 0.112      | 77.1       | 8.421       | 0.045        | 2.63         |
| 12/4/2018       | 9:29:24 |  | 20.945  | 0.114      | 76.31      | 8.418       | 0.046        | 2.604        |
| 12/4/2018       | 9:30:24 |  | 20.947  | 0.118      | 72.31      | 8.419       | 0.047        | 2.47         |
| 12/4/2018       | 9:31:24 |  | 20.936  | 0.118      | 68.63      | 8.415       | 0.047        | 2.348        |
| 12/4/2018       | 9:32:24 |  | 20.937  | 0.117      | 57.28      | 8.415       | 0.047        | 1.969        |
| 12/4/2018       | 9:33:24 |  | 20.942  | 0.117      | 43.16      | 8.417       | 0.047        | 1.499        |
| 12/4/2018       | 9:34:24 |  | 20.952  | 0.117      | 39.6       | 8.421       | 0.047        | 1.38         |
| 12/4/2018       | 9:35:24 |  | 20.952  | 0.117      | 42.96      | 8.421       | 0.047        | 1.492        |
| 12/4/2018       | 9:36:24 |  | 20.952  | 0.116      | 49.92      | 8.421       | 0.046        | 1.724        |
| 12/4/2018       | 9:37:24 |  | 20.957  | 0.114      | 57.59      | 8.423       | 0.046        | 1.98         |
| 12/4/2018       | 9:38:23 |  | 20.953  | 0.114      | 63.62      | 8.421       | 0.046        | 2.181        |
| 12/4/2018       | 9:39:24 |  | 20.956  | 0.115      | 67.37      | 8.422       | 0.046        | 2.306        |
| 12/4/2018       | 9:40:24 |  | 20.955  | 0.114      | 71.1       | 8.422       | 0.046        | 2.43         |
| 12/4/2018       | 9:41:23 |  | 20.952  | 0.115      | 74.07      | 8.421       | 0.046        | 2.529        |
| 12/4/2018       | 9:42:24 |  | 20.947  | 0.115      | 72.76      | 8.419       | 0.046        | 2.485        |
| 12/4/2018       | 9:43:24 |  | 20.949  | 0.114      | 55.4       | 8.42        | 0.046        | 1.907        |
| 12/4/2018       | 9:44:24 |  | 20.955  | 0.115      | 35.21      | 8.422       | 0.046        | 1.234        |
| 12/4/2018       | 9:45:23 |  | 20.951  | 0.116      | 30.72      | 8.421       | 0.046        | 1.084        |
| 12/4/2018       | 9:46:24 |  | 20.948  | 0.12       | 33.63      | 8.419       | 0.048        | 1.181        |
| 12/4/2018       | 9:47:24 |  | 20.95   | 0.12       | 31.1       | 8.42        | 0.048        | 1.097        |
| 12/4/2018       | 9:48:23 |  | 20.954  | 0.12       | 33.67      | 8.422       | 0.048        | 1.182        |
| 12/4/2018       | 9:49:24 |  | 20.956  | 0.12       | 39.77      | 8.422       | 0.048        | 1.386        |
| 12/4/2018       | 9:50:24 |  | 20.954  | 0.12       | 46.11      | 8.422       | 0.048        | 1.597        |
| 12/4/2018       | 9:51:24 |  | 20.952  | 0.119      | 51.73      | 8.421       | 0.048        | 1.784        |
| Pause           |         |  |         |            |            |             |              |              |
| End Pause       |         |  |         |            |            |             |              |              |
| 12/4/2018       | 9:53:24 |  | 20.957  | 0.117      | 61.13      | 8.423       | 0.047        | 2.098        |
| 12/4/2018       | 9:54:24 |  | 20.957  | 0.118      | 68.74      | 8.423       | 0.047        | 2.351        |
| 12/4/2018       | 9:55:23 |  | 20.952  | 0.122      | 72.18      | 8.421       | 0.049        | 2.466        |
| 12/4/2018       | 9:56:24 |  | 20.95   | 0.122      | 73.76      | 8.42        | 0.049        | 2.519        |

Test Run 1 Begin. STRATA Version 3.2.112

Operator: David Goshaw  
 Plant Name: Enviva Greenwood  
 Location: DHM Stack

|           |          | O2<br>%  | CO2<br>ppm | THC<br>ppm | O2<br>Volts | CO2<br>Volts | THC<br>Volts |
|-----------|----------|----------|------------|------------|-------------|--------------|--------------|
| 12/4/2018 | 9:57:24  | 20.951   | 0.123      | 74.75      | 8.42        | 0.049        | 2.552        |
| 12/4/2018 | 9:58:24  | 20.949   | 0.123      | 75.56      | 8.42        | 0.049        | 2.579        |
| 12/4/2018 | 9:59:24  | 20.949   | 0.123      | 76.09      | 8.419       | 0.049        | 2.596        |
| 12/4/2018 | 10:00:23 | 20.949   | 0.122      | 77.07      | 8.42        | 0.049        | 2.629        |
| 12/4/2018 | 10:01:24 | 20.95    | 0.123      | 78.08      | 8.42        | 0.049        | 2.663        |
| 12/4/2018 | 10:02:24 | 20.95    | 0.123      | 79.06      | 8.42        | 0.049        | 2.695        |
| 12/4/2018 | 10:03:23 | 20.948   | 0.123      | 80.35      | 8.419       | 0.049        | 2.738        |
| 12/4/2018 | 10:04:25 | 20.951   | 0.123      | 82.52      | 8.42        | 0.049        | 2.811        |
| 12/4/2018 | 10:05:24 | 20.949   | 0.123      | 86.06      | 8.42        | 0.049        | 2.929        |
| 12/4/2018 | 10:06:24 | 20.948   | 0.123      | 88.89      | 8.419       | 0.049        | 3.023        |
| 12/4/2018 | 10:07:23 | 20.946   | 0.123      | 90.19      | 8.419       | 0.049        | 3.066        |
| 12/4/2018 | 10:08:24 | 20.945   | 0.124      | 82.14      | 8.418       | 0.049        | 2.798        |
| 12/4/2018 | 10:09:24 | 20.948   | 0.123      | 76.74      | 8.419       | 0.049        | 2.618        |
| 12/4/2018 | 10:10:23 | 20.948   | 0.124      | 78.08      | 8.419       | 0.05         | 2.663        |
| 12/4/2018 | 10:11:24 | 20.945   | 0.123      | 79.87      | 8.418       | 0.049        | 2.722        |
| 12/4/2018 | 10:12:24 | 20.947   | 0.123      | 73.72      | 8.419       | 0.049        | 2.517        |
| 12/4/2018 | 10:13:24 | 20.95    | 0.123      | 72.59      | 8.42        | 0.049        | 2.48         |
| 12/4/2018 | 10:14:23 | 20.951   | 0.123      | 74.22      | 8.42        | 0.049        | 2.534        |
| 12/4/2018 | 10:15:24 | 20.945   | 0.123      | 76.73      | 8.418       | 0.049        | 2.618        |
| 12/4/2018 | 10:16:24 | 20.948   | 0.124      | 78.91      | 8.419       | 0.049        | 2.69         |
| 12/4/2018 | 10:17:24 | 20.947   | 0.123      | 79.41      | 8.419       | 0.049        | 2.707        |
| 12/4/2018 | 10:18:24 | 20.951   | 0.124      | 79.77      | 8.421       | 0.049        | 2.719        |
| 12/4/2018 | 10:19:24 | 20.95    | 0.123      | 80.35      | 8.42        | 0.049        | 2.738        |
| 12/4/2018 | 10:20:23 | 20.954   | 0.123      | 81.19      | 8.421       | 0.049        | 2.766        |
| 12/4/2018 | 10:21:24 | 20.481   | 0.123      | 82.43      | 8.232       | 0.049        | 2.808        |
| 12/4/2018 | 10:22:24 | 20.949   | 0.123      | 83.82      | 8.42        | 0.049        | 2.854        |
| Avg       |          | 20.94233 | 0.1185     | 65.62515   | 8.416985    | 0.047364     | 2.24753      |



Test Run 2 Begin. STRATA Version 3.2.112

Operator: David Goshaw

Plant Name: Enviva Greenwood

Location: DHM Stack

|                 |          | O2<br>% | CO2<br>ppm | THC<br>ppm | O2<br>Volts |
|-----------------|----------|---------|------------|------------|-------------|
| Start Averaging |          |         |            |            |             |
| 12/4/2018       | 11:18:18 | 20.954  | 0.121      | 58.22      | 8.421       |
| 12/4/2018       | 11:19:19 | 20.956  | 0.121      | 57.21      | 8.422       |
| 12/4/2018       | 11:20:19 | 20.953  | 0.118      | 60.1       | 8.421       |
| 12/4/2018       | 11:21:18 | 20.953  | 0.119      | 61.9       | 8.421       |
| 12/4/2018       | 11:22:18 | 20.951  | 0.118      | 64.57      | 8.42        |
| 12/4/2018       | 11:23:18 | 20.95   | 0.119      | 67.09      | 8.42        |
| 12/4/2018       | 11:24:19 | 20.95   | 0.118      | 68.96      | 8.42        |
| 12/4/2018       | 11:25:19 | 20.955  | 0.116      | 70.42      | 8.422       |
| 12/4/2018       | 11:26:18 | 20.953  | 0.117      | 71.18      | 8.421       |
| 12/4/2018       | 11:27:19 | 20.959  | 0.114      | 71.74      | 8.423       |
| 12/4/2018       | 11:28:18 | 20.958  | 0.115      | 72.59      | 8.423       |
| 12/4/2018       | 11:29:18 | 20.959  | 0.113      | 73.15      | 8.424       |
| 12/4/2018       | 11:30:19 | 20.961  | 0.114      | 74.36      | 8.424       |
| 12/4/2018       | 11:31:19 | 20.959  | 0.114      | 75.49      | 8.424       |
| 12/4/2018       | 11:32:18 | 20.962  | 0.113      | 76.38      | 8.425       |
| 12/4/2018       | 11:33:18 | 20.962  | 0.113      | 77.83      | 8.425       |
| 12/4/2018       | 11:34:19 | 20.963  | 0.113      | 79.34      | 8.425       |
| 12/4/2018       | 11:35:19 | 20.963  | 0.114      | 80.72      | 8.425       |
| 12/4/2018       | 11:36:18 | 20.967  | 0.113      | 82.44      | 8.427       |
| 12/4/2018       | 11:37:18 | 20.964  | 0.113      | 83.99      | 8.426       |
| 12/4/2018       | 11:38:19 | 20.965  | 0.112      | 85.54      | 8.426       |
| 12/4/2018       | 11:39:18 | 20.957  | 0.119      | 86.25      | 8.423       |
| 12/4/2018       | 11:40:18 | 20.953  | 0.121      | 86.57      | 8.421       |
| 12/4/2018       | 11:41:19 | 20.957  | 0.12       | 86.11      | 8.423       |
| 12/4/2018       | 11:42:19 | 20.957  | 0.12       | 85.42      | 8.423       |
| 12/4/2018       | 11:43:18 | 20.953  | 0.12       | 83.66      | 8.421       |
| 12/4/2018       | 11:44:18 | 20.959  | 0.12       | 82.04      | 8.424       |
| 12/4/2018       | 11:45:19 | 20.952  | 0.12       | 81.05      | 8.421       |
| 12/4/2018       | 11:46:18 | 20.952  | 0.121      | 80.66      | 8.421       |
| 12/4/2018       | 11:47:18 | 20.951  | 0.12       | 80.66      | 8.42        |
| 12/4/2018       | 11:48:19 | 20.952  | 0.12       | 81.48      | 8.421       |
| 12/4/2018       | 11:49:18 | 20.948  | 0.12       | 82.94      | 8.419       |
| 12/4/2018       | 11:50:18 | 20.948  | 0.12       | 84.16      | 8.419       |
| 12/4/2018       | 11:51:18 | 20.954  | 0.12       | 85.61      | 8.421       |
| 12/4/2018       | 11:52:18 | 20.951  | 0.119      | 87.16      | 8.42        |
| 12/4/2018       | 11:53:19 | 20.953  | 0.117      | 89.61      | 8.421       |
| 12/4/2018       | 11:54:19 | 20.953  | 0.117      | 91.64      | 8.421       |
| 12/4/2018       | 11:55:18 | 20.948  | 0.117      | 93.61      | 8.419       |
| 12/4/2018       | 11:56:19 | 20.951  | 0.117      | 94.81      | 8.421       |

Pause

End Pause

Test Run 2 Begin. STRATA Version 3.2.112

Operator: David Goshaw

Plant Name: Enviva Greenwood

Location: DHM Stack

|           |            | O2<br>% | CO2<br>ppm | THC<br>ppm | O2<br>Volts |
|-----------|------------|---------|------------|------------|-------------|
| 12/4/2018 | 11:59:18   | 20.952  | 0.117      | 86.6       | 8.421       |
| 12/4/2018 | 12:00:19   | 20.95   | 0.118      | 89.21      | 8.42        |
| 12/4/2018 | 12:01:18   | 20.947  | 0.118      | 90.97      | 8.419       |
| 12/4/2018 | 12:02:19   | 20.947  | 0.119      | 90.74      | 8.419       |
| 12/4/2018 | 12:03:18   | 20.946  | 0.118      | 89.75      | 8.418       |
| 12/4/2018 | 12:04:18   | 20.944  | 0.119      | 89.12      | 8.418       |
| 12/4/2018 | 12:05:19   | 20.944  | 0.119      | 89.03      | 8.418       |
| 12/4/2018 | 12:06:18   | 20.941  | 0.119      | 89.81      | 8.416       |
| 12/4/2018 | 12:07:18   | 20.944  | 0.118      | 90.97      | 8.418       |
| 12/4/2018 | 12:08:18   | 20.943  | 0.119      | 91.77      | 8.417       |
| 12/4/2018 | 12:09:19   | 20.945  | 0.119      | 92.15      | 8.418       |
| 12/4/2018 | 12:10:18   | 20.942  | 0.119      | 92.33      | 8.417       |
| 12/4/2018 | 12:11:18   | 20.945  | 0.119      | 93.7       | 8.418       |
| 12/4/2018 | 12:12:19   | 20.94   | 0.119      | 95.06      | 8.416       |
| 12/4/2018 | 12:13:18   | 20.937  | 0.121      | 95.72      | 8.415       |
| 12/4/2018 | 12:14:19   | 20.94   | 0.121      | 96.03      | 8.416       |
| 12/4/2018 | 12:15:19   | 20.941  | 0.121      | 95.93      | 8.416       |
| 12/4/2018 | 12:16:18   | 20.938  | 0.12       | 95.34      | 8.415       |
| 12/4/2018 | 12:17:19   | 20.938  | 0.12       | 93.95      | 8.415       |
| 12/4/2018 | 12:18:19   | 20.937  | 0.12       | 93.08      | 8.415       |
| 12/4/2018 | 12:19:18   | 20.938  | 0.12       | 92.26      | 8.415       |
| 12/4/2018 | 12:20:18   | 20.937  | 0.12       | 90.95      | 8.415       |
| 12/4/2018 | 12:21:19   | 20.931  | 0.119      | 90.41      | 8.413       |
| 12/4/2018 | 12:22:19   | 20.935  | 0.12       | 89.51      | 8.414       |
| 12/4/2018 | 12:23:18   | 20.945  | 0.128      | 90.23      | 8.418       |
| 12/4/2018 | 12:24:19   | 20.943  | 0.127      | 90.67      | 8.417       |
| Average   | 2883 sampl | 20.95   | 0.118      | 83.79      | 8.42        |

Test Run 2 End

Test Run 3 Begin. STRATA Version 3.2.112

Operator: David Goshaw

Plant Name Enviva Greenwood

Location: DHM Stack

|                 |          | O2<br>% | CO2<br>ppm | THC<br>ppm |
|-----------------|----------|---------|------------|------------|
| Start Averaging |          |         |            |            |
| 12/4/2018       | 13:04:58 | 20.913  | 0.113      | 63.32      |
| 12/4/2018       | 13:05:59 | 20.91   | 0.115      | 65.39      |
| 12/4/2018       | 13:06:59 | 20.914  | 0.115      | 67.18      |
| 12/4/2018       | 13:07:59 | 20.912  | 0.114      | 68.43      |
| 12/4/2018       | 13:08:59 | 20.911  | 0.115      | 69.45      |
| 12/4/2018       | 13:09:58 | 20.91   | 0.114      | 69.84      |
| 12/4/2018       | 13:10:59 | 20.91   | 0.115      | 71.47      |
| 12/4/2018       | 13:11:59 | 20.913  | 0.114      | 73.46      |
| 12/4/2018       | 13:12:59 | 20.908  | 0.115      | 74.62      |
| 12/4/2018       | 13:13:58 | 20.911  | 0.115      | 74.94      |
| 12/4/2018       | 13:14:58 | 20.909  | 0.115      | 75.8       |
| 12/4/2018       | 13:15:59 | 20.911  | 0.114      | 77.14      |
| 12/4/2018       | 13:16:58 | 20.909  | 0.113      | 78.77      |
| 12/4/2018       | 13:17:58 | 20.909  | 0.112      | 79.68      |
| 12/4/2018       | 13:18:59 | 20.912  | 0.112      | 80.79      |
| 12/4/2018       | 13:19:59 | 20.91   | 0.11       | 82.46      |
| 12/4/2018       | 13:20:59 | 20.91   | 0.112      | 82.64      |
| 12/4/2018       | 13:21:59 | 20.912  | 0.113      | 82.81      |
| 12/4/2018       | 13:22:58 | 20.906  | 0.112      | 83.72      |
| 12/4/2018       | 13:23:59 | 20.91   | 0.112      | 84.36      |
| 12/4/2018       | 13:24:59 | 20.909  | 0.11       | 85.39      |
| 12/4/2018       | 13:25:58 | 20.91   | 0.111      | 86.61      |
| 12/4/2018       | 13:26:59 | 20.908  | 0.108      | 87.65      |
| 12/4/2018       | 13:27:59 | 20.909  | 0.111      | 80.87      |
| 12/4/2018       | 13:28:59 | 20.909  | 0.111      | 73.9       |
| 12/4/2018       | 13:29:58 | 20.909  | 0.109      | 72.09      |
| 12/4/2018       | 13:30:58 | 20.905  | 0.113      | 72.6       |
| 12/4/2018       | 13:31:59 | 20.914  | 0.104      | 74.47      |
| 12/4/2018       | 13:32:59 | 20.92   | 0.096      | 76.04      |
| 12/4/2018       | 13:33:58 | 20.909  | 0.099      | 76.11      |
| 12/4/2018       | 13:34:59 | 20.916  | 0.093      | 76.63      |
| 12/4/2018       | 13:35:59 | 20.919  | 0.091      | 77.5       |
| 12/4/2018       | 13:36:59 | 20.917  | 0.092      | 79.64      |
| 12/4/2018       | 13:37:59 | 20.905  | 0.102      | 81.92      |
| 12/4/2018       | 13:38:58 | 20.899  | 0.105      | 83.1       |
| 12/4/2018       | 13:39:59 | 20.898  | 0.106      | 83.87      |
| 12/4/2018       | 13:40:59 | 20.9    | 0.104      | 85.59      |
| 12/4/2018       | 13:41:58 | 20.9    | 0.104      | 87.4       |
| 12/4/2018       | 13:42:59 | 20.898  | 0.104      | 90.23      |
| 12/4/2018       | 13:43:59 | 20.899  | 0.104      | 92.03      |
| 12/4/2018       | 13:44:59 | 20.9    | 0.105      | 92.96      |
| 12/4/2018       | 13:45:58 | 20.902  | 0.104      | 92.77      |
| 12/4/2018       | 13:46:59 | 20.905  | 0.105      | 92.59      |

Test Run 3 Begin. STRATA Version 3.2.112

Operator: David Goshaw

Plant Name Enviva Greenwood

Location: DHM Stack

|           |          | O2<br>% | CO2<br>ppm | THC<br>ppm |
|-----------|----------|---------|------------|------------|
| 12/4/2018 | 13:47:59 | 20.905  | 0.104      | 91.46      |
| 12/4/2018 | 13:48:58 | 20.903  | 0.105      | 90.04      |
| 12/4/2018 | 13:49:59 | 20.904  | 0.104      | 88.67      |
| 12/4/2018 | 13:50:59 | 20.905  | 0.105      | 87         |

Pause

|           |          |        |       |       |
|-----------|----------|--------|-------|-------|
| 12/4/2018 | 13:55:58 | 20.907 | 0.106 | 85.92 |
| 12/4/2018 | 13:56:59 | 20.905 | 0.105 | 86.93 |

End Pause

|           |          |        |       |       |
|-----------|----------|--------|-------|-------|
| 12/4/2018 | 13:57:59 | 20.902 | 0.105 | 87.83 |
| 12/4/2018 | 13:58:58 | 20.906 | 0.105 | 89.97 |
| 12/4/2018 | 13:59:58 | 20.904 | 0.105 | 91.87 |
| 12/4/2018 | 14:00:59 | 20.905 | 0.105 | 92.4  |
| 12/4/2018 | 14:01:59 | 20.904 | 0.105 | 93.2  |
| 12/4/2018 | 14:02:58 | 20.902 | 0.105 | 93.25 |
| 12/4/2018 | 14:03:58 | 20.903 | 0.105 | 92.78 |
| 12/4/2018 | 14:04:59 | 20.904 | 0.105 | 91.38 |
| 12/4/2018 | 14:05:59 | 20.903 | 0.105 | 88.84 |
| 12/4/2018 | 14:06:58 | 20.902 | 0.105 | 86.69 |
| 12/4/2018 | 14:07:59 | 20.903 | 0.104 | 85.11 |
| 12/4/2018 | 14:08:59 | 20.903 | 0.105 | 84.56 |
| 12/4/2018 | 14:09:58 | 20.901 | 0.104 | 84.27 |
| 12/4/2018 | 14:10:59 | 20.9   | 0.105 | 84.3  |
| 12/4/2018 | 14:11:59 | 20.901 | 0.104 | 84.49 |

20.90691 0.107219 82.33109

| Date           | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCI<br>(ppm) | SEC<br>(ppm) | Methanol<br>(ppm) | SEC<br>(ppm) | Acet-<br>aldehyde<br>(ppm) | SEC<br>(ppm) |
|----------------|----------------------------|--------------|--------------|--------------|-------------------|--------------|----------------------------|--------------|
| Run 1          | 0.146                      | 0.063        | 0.124        | 0.056        | 0.771             | 0.217        | 0.258                      | 0.180        |
|                | 0.146                      |              | 0.124        |              | 0.771             |              | 0.360                      |              |
| Run 2          | -0.014                     | 0.075        | 0.065        | 0.056        | 1.067             | 0.205        | 0.299                      | 0.189        |
|                | 0.150                      |              | 0.113        |              | 1.067             |              | 0.377                      |              |
| 12/4/2018 9:15 | 0.035                      | 0.062        | 0.232        | 0.056        | 0.762             | 0.163        | 0.374                      | 0.179        |
| 12/4/2018 9:16 | 0.106                      | 0.052        | 0.164        | 0.055        | 0.536             | 0.14         | 0.277                      | 0.172        |
| 12/4/2018 9:17 | 0.079                      | 0.048        | 0.196        | 0.056        | 0.49              | 0.129        | 0.188                      | 0.166        |
| 12/4/2018 9:18 | 0.028                      | 0.049        | 0.155        | 0.049        | 0.524             | 0.13         | 0.139                      | 0.164        |
| 12/4/2018 9:19 | 0.095                      | 0.052        | 0.14         | 0.053        | 0.576             | 0.139        | 0.22                       | 0.166        |
| 12/4/2018 9:20 | 0.14                       | 0.057        | 0.126        | 0.054        | 0.644             | 0.148        | 0.278                      | 0.176        |
| 12/4/2018 9:21 | 0.252                      | 0.06         | 0.197        | 0.056        | 0.734             | 0.157        | 0.28                       | 0.177        |
| 12/4/2018 9:22 | 0.272                      | 0.062        | 0.269        | 0.058        | 0.773             | 0.164        | 0.257                      | 0.179        |
| 12/4/2018 9:23 | 0.156                      | 0.065        | 0.179        | 0.056        | 0.794             | 0.17         | 0.342                      | 0.179        |
| 12/4/2018 9:24 | 0.111                      | 0.066        | 0.059        | 0.053        | 0.852             | 0.175        | 0.393                      | 0.178        |
| 12/4/2018 9:25 | 0.119                      | 0.068        | 0.061        | 0.054        | 0.89              | 0.178        | 0.394                      | 0.184        |
| 12/4/2018 9:26 | 0.126                      | 0.071        | 0.147        | 0.06         | 0.906             | 0.18         | 0.324                      | 0.185        |
| 12/4/2018 9:27 | 0.125                      | 0.069        | 0.099        | 0.056        | 0.894             | 0.179        | 0.32                       | 0.18         |
| 12/4/2018 9:28 | 0.11                       | 0.067        | 0.162        | 0.056        | 0.844             | 0.174        | 0.227                      | 0.177        |
| 12/4/2018 9:29 | 0.036                      | 0.066        | 0.154        | 0.056        | 0.782             | 0.169        | 0.417                      | 0.182        |
| 12/4/2018 9:30 | 0.069                      | 0.061        | 0.173        | 0.054        | 0.695             | 0.156        | 0.163                      | 0.178        |
| 12/4/2018 9:31 | 0.102                      | 0.051        | 0.187        | 0.056        | 0.554             | 0.135        | 0.366                      | 0.174        |
| 12/4/2018 9:32 | 0.188                      | 0.049        | 0.161        | 0.054        | 0.478             | 0.128        | 0.28                       | 0.17         |
| 12/4/2018 9:33 | 0.221                      | 0.053        | 0.133        | 0.056        | 0.555             | 0.134        | 0.253                      | 0.172        |
| 12/4/2018 9:34 | 0.178                      | 0.054        | 0.158        | 0.055        | 0.615             | 0.142        | 0.215                      | 0.173        |
| 12/4/2018 9:35 | 0.153                      | 0.059        | 0.218        | 0.054        | 0.642             | 0.151        | 0.43                       | 0.173        |
| 12/4/2018 9:36 | 0.147                      | 0.062        | 0.163        | 0.057        | 0.726             | 0.158        | 0.262                      | 0.182        |
| 12/4/2018 9:37 | 0.081                      | 0.063        | 0.187        | 0.056        | 0.726             | 0.164        | 0.137                      | 0.177        |
| 12/4/2018 9:38 | 0.075                      | 0.066        | 0.069        | 0.055        | 0.796             | 0.17         | 0.288                      | 0.183        |
| 12/4/2018 9:39 | 0.149                      | 0.067        | 0.09         | 0.054        | 0.861             | 0.177        | 0.304                      | 0.184        |
| 12/4/2018 9:40 | 0.108                      | 0.068        | 0.071        | 0.057        | 0.894             | 0.181        | 0.303                      | 0.181        |
| 12/4/2018 9:41 | 0.051                      | 0.062        | 0.154        | 0.058        | 0.749             | 0.169        | 0.26                       | 0.175        |
| 12/4/2018 9:42 | 0.137                      | 0.049        | 0.21         | 0.054        | 0.487             | 0.138        | 0.24                       | 0.172        |
| 12/4/2018 9:43 | 0.195                      | 0.045        | 0.2          | 0.051        | 0.401             | 0.122        | 0.128                      | 0.169        |
| 12/4/2018 9:44 | 0.281                      | 0.048        | 0.088        | 0.055        | 0.387             | 0.117        | 0.371                      | 0.165        |
| 12/4/2018 9:45 | 0.198                      | 0.045        | 0.192        | 0.052        | 0.4               | 0.11         | 0.201                      | 0.165        |
| 12/4/2018 9:46 | 0.129                      | 0.048        | 0.176        | 0.055        | 0.455             | 0.114        | 0.115                      | 0.169        |
| 12/4/2018 9:47 | 0.109                      | 0.05         | 0.138        | 0.053        | 0.517             | 0.125        | 0.159                      | 0.173        |
| 12/4/2018 9:48 | 0.081                      | 0.052        | 0.172        | 0.053        | 0.581             | 0.138        | 0.313                      | 0.172        |
| 12/4/2018 9:49 | 0.06                       | 0.056        | 0.169        | 0.057        | 0.661             | 0.146        | 0.331                      | 0.175        |
| 12/4/2018 9:50 | 0.007                      | 0.052        | 0.157        | 0.053        | 0.557             | 0.129        | 0.363                      | 0.169        |
| 12/4/2018 9:51 |                            |              |              |              |                   |              |                            |              |
| 12/4/2018 9:52 |                            |              |              |              |                   |              |                            |              |
| 12/4/2018 9:53 | 0.232                      | 0.066        | 0.093        | 0.056        | 0.933             | 0.172        | 0.416                      | 0.186        |
| 12/4/2018 9:54 | 0.36                       | 0.067        | 0.119        | 0.058        | 0.962             | 0.175        | 0.532                      | 0.183        |
| 12/4/2018 9:55 | 0.381                      | 0.067        | 0.132        | 0.054        | 0.965             | 0.177        | 0.25                       | 0.179        |
| 12/4/2018 9:56 | 0.237                      | 0.069        | 0.128        | 0.058        | 0.939             | 0.18         | 0.476                      | 0.185        |
| 12/4/2018 9:57 | 0.188                      | 0.069        | 0.066        | 0.058        | 0.911             | 0.179        | 0.23                       | 0.186        |
| 12/4/2018 9:58 | 0.083                      | 0.07         | 0.129        | 0.057        | 0.967             | 0.182        | 0.465                      | 0.185        |
| 12/4/2018 9:59 | 0.139                      | 0.071        | 0.069        | 0.058        | 0.976             | 0.183        | 0.327                      | 0.183        |

| Date            | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCI<br>(ppm) | SEC<br>(ppm) | Methanol<br>(ppm) | SEC<br>(ppm) | Acet-<br>aldehyde<br>(ppm) | SEC<br>(ppm) |
|-----------------|----------------------------|--------------|--------------|--------------|-------------------|--------------|----------------------------|--------------|
| 12/4/2018 10:00 | 0.149                      | 0.069        | 0.079        | 0.054        | 0.993             | 0.181        | 0.091                      | 0.179        |
| 12/4/2018 10:01 | 0.091                      | 0.072        | 0.04         | 0.056        | 0.997             | 0.184        | 0.116                      | 0.186        |
| 12/4/2018 10:02 | 0.112                      | 0.074        | 0.097        | 0.06         | 1.013             | 0.185        | 0.204                      | 0.19         |
| 12/4/2018 10:03 | 0.165                      | 0.074        | 0.077        | 0.057        | 1.029             | 0.188        | 0.44                       | 0.189        |
| 12/4/2018 10:04 | 0.209                      | 0.079        | 0.1          | 0.061        | 1.053             | 0.186        | 0.269                      | 0.194        |
| 12/4/2018 10:05 | 0.283                      | 0.075        | 0.045        | 0.058        | 1.04              | 0.189        | 0.387                      | 0.192        |
| 12/4/2018 10:06 | 0.196                      | 0.074        | 0.16         | 0.058        | 0.956             | 0.186        | 0.372                      | 0.189        |
| 12/4/2018 10:07 | 0.202                      | 0.07         | 0.077        | 0.058        | 0.894             | 0.176        | 0.447                      | 0.188        |
| 12/4/2018 10:08 | 0.124                      | 0.069        | 0.056        | 0.056        | 0.902             | 0.177        | 0.262                      | 0.186        |
| 12/4/2018 10:09 | 0.125                      | 0.072        | 0.051        | 0.059        | 0.905             | 0.178        | 0.322                      | 0.187        |
| 12/4/2018 10:10 | 0.13                       | 0.068        | 0.128        | 0.058        | 0.877             | 0.174        | 0.051                      | 0.186        |
| 12/4/2018 10:11 | 0.07                       | 0.069        | 0.179        | 0.058        | 0.874             | 0.171        | 0.137                      | 0.187        |
| 12/4/2018 10:12 | 0.089                      | 0.068        | 0.051        | 0.056        | 0.842             | 0.174        | 0.018                      | 0.185        |
| 12/4/2018 10:13 | 0.08                       | 0.07         | 0.137        | 0.054        | 0.873             | 0.176        | 0.225                      | 0.185        |
| 12/4/2018 10:14 | 0.175                      | 0.072        | 0.041        | 0.057        | 0.903             | 0.18         | 0.14                       | 0.185        |
| 12/4/2018 10:15 | 0.245                      | 0.073        | 0.089        | 0.059        | 0.891             | 0.181        | 0.213                      | 0.189        |
| 12/4/2018 10:16 | 0.286                      | 0.071        | 0.083        | 0.054        | 0.902             | 0.183        | 0.257                      | 0.185        |
| 12/4/2018 10:17 | 0.206                      | 0.071        | 0.063        | 0.057        | 0.903             | 0.183        | 0.231                      | 0.188        |
| 12/4/2018 10:18 | 0.181                      | 0.072        | 0.09         | 0.057        | 0.906             | 0.186        | 0.111                      | 0.194        |
| 12/4/2018 10:19 | 0.145                      | 0.074        | 0.029        | 0.058        | 0.966             | 0.187        | 0.066                      | 0.185        |
| 12/4/2018 10:20 | 0.124                      | 0.075        | 0.053        | 0.057        | 0.96              | 0.189        | 0.033                      | 0.191        |
| 12/4/2018 10:21 | 0.15                       | 0.077        | 0.055        | 0.06         | 0.994             | 0.188        | 0.056                      | 0.195        |
| 12/4/2018 10:22 | 0.087                      | 0.065        | 0.116        | 0.056        | 0.86              | 0.72         | 0.079                      | 0.18         |
| 12/4/2018 10:23 | 0.05                       | 0.028        | 0.073        | 0.036        | -0.254            | 3.179        | 0.182                      | 0.16         |
|                 |                            |              |              |              |                   |              |                            |              |
| 12/4/2018 11:18 | 0.057                      | 0.061        | 0.047        | 0.057        | 0.764             | 0.151        | 0.151                      | 0.181        |
| 12/4/2018 11:19 | -0.063                     | 0.064        | 0.118        | 0.058        | 0.757             | 0.154        | 0.206                      | 0.184        |
| 12/4/2018 11:20 | -0.016                     | 0.063        | 0.142        | 0.056        | 0.771             | 0.157        | 0.161                      | 0.177        |
| 12/4/2018 11:21 | -0.054                     | 0.066        | 0.132        | 0.053        | 0.826             | 0.161        | 0.246                      | 0.18         |
| 12/4/2018 11:22 | -0.055                     | 0.067        | 0.078        | 0.056        | 0.874             | 0.165        | 0.059                      | 0.183        |
| 12/4/2018 11:23 | -0.016                     | 0.068        | 0.073        | 0.057        | 0.886             | 0.165        | 0.204                      | 0.188        |
| 12/4/2018 11:24 | -0.052                     | 0.066        | 0.007        | 0.056        | 0.876             | 0.168        | 0.15                       | 0.183        |
| 12/4/2018 11:25 | -0.013                     | 0.07         | 0.055        | 0.058        | 0.854             | 0.166        | 0.396                      | 0.188        |
| 12/4/2018 11:26 | 0.069                      | 0.068        | 0.062        | 0.056        | 0.866             | 0.169        | 0.394                      | 0.183        |
| 12/4/2018 11:27 | 0.079                      | 0.068        | 0.077        | 0.057        | 0.884             | 0.169        | 0.219                      | 0.184        |
| 12/4/2018 11:28 | 0.026                      | 0.069        | 0.101        | 0.058        | 0.959             | 0.171        | 0.354                      | 0.191        |
| 12/4/2018 11:29 | -0.006                     | 0.072        | 0.102        | 0.056        | 0.906             | 0.171        | 0.25                       | 0.186        |
| 12/4/2018 11:30 | 0.026                      | 0.071        | 0.115        | 0.057        | 0.911             | 0.172        | 0.137                      | 0.188        |
| 12/4/2018 11:31 | -0.014                     | 0.072        | 0.035        | 0.059        | 0.965             | 0.174        | 0.288                      | 0.193        |
| 12/4/2018 11:32 | -0.103                     | 0.071        | 0.069        | 0.054        | 0.972             | 0.176        | 0.353                      | 0.187        |
| 12/4/2018 11:33 | -0.083                     | 0.074        | 0.028        | 0.057        | 0.993             | 0.176        | 0.336                      | 0.188        |
| 12/4/2018 11:34 | -0.029                     | 0.073        | 0.092        | 0.056        | 0.975             | 0.175        | 0.254                      | 0.186        |
| 12/4/2018 11:35 | -0.016                     | 0.076        | 0.078        | 0.058        | 1.054             | 0.176        | 0.294                      | 0.192        |
| 12/4/2018 11:36 | -0.003                     | 0.074        | 0.052        | 0.053        | 1.081             | 0.177        | 0.399                      | 0.189        |
| 12/4/2018 11:37 | 0.05                       | 0.075        | 0.084        | 0.058        | 1.048             | 0.177        | 0.298                      | 0.192        |
| 12/4/2018 11:38 | 0.006                      | 0.075        | 0.146        | 0.053        | 1.062             | 0.177        | 0.406                      | 0.188        |
| 12/4/2018 11:39 | -0.051                     | 0.073        | 0.032        | 0.054        | 1.125             | 0.18         | 0.475                      | 0.186        |
| 12/4/2018 11:40 | -0.047                     | 0.076        | -0.021       | 0.052        | 1.078             | 0.178        | 0.243                      | 0.193        |
| 12/4/2018 11:41 | -0.096                     | 0.076        | 0.064        | 0.057        | 1.068             | 0.178        | 0.405                      | 0.185        |
| 12/4/2018 11:42 | -0.09                      | 0.074        | 0.075        | 0.058        | 1.059             | 0.176        | 0.31                       | 0.189        |
| 12/4/2018 11:43 | -0.063                     | 0.073        | 0.086        | 0.053        | 1.034             | 0.176        | 0.223                      | 0.185        |
| 12/4/2018 11:44 | -0.04                      | 0.075        | 0.03         | 0.053        | 1.082             | 0.174        | -0.016                     | 0.186        |

| Date            | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCI<br>(ppm) | SEC<br>(ppm) | Methanol<br>(ppm) | SEC<br>(ppm) | Acet-<br>aldehyde<br>(ppm) | SEC<br>(ppm) |
|-----------------|----------------------------|--------------|--------------|--------------|-------------------|--------------|----------------------------|--------------|
| 12/4/2018 11:45 | 0.011                      | 0.074        | 0.072        | 0.059        | 1.042             | 0.176        | 0.147                      | 0.196        |
| 12/4/2018 11:46 | 0.11                       | 0.075        | 0.039        | 0.061        | 1.069             | 0.174        | -0.137                     | 0.197        |
| 12/4/2018 11:47 | 0.118                      | 0.074        | 0.047        | 0.06         | 1.056             | 0.174        | -0.121                     | 0.196        |
| 12/4/2018 11:48 | 0.016                      | 0.075        | 0.071        | 0.058        | 1.047             | 0.175        | 0.171                      | 0.191        |
| 12/4/2018 11:49 | -0.029                     | 0.078        | 0.052        | 0.059        | 1.066             | 0.177        | 0.232                      | 0.19         |
| 12/4/2018 11:50 | -0.098                     | 0.076        | 0.099        | 0.052        | 1.074             | 0.177        | 0.218                      | 0.184        |
| 12/4/2018 11:51 | -0.111                     | 0.079        | 0.028        | 0.058        | 1.109             | 0.177        | 0.323                      | 0.187        |
| 12/4/2018 11:52 | -0.104                     | 0.079        | 0.054        | 0.053        | 1.126             | 0.178        | 0.369                      | 0.184        |
| 12/4/2018 11:53 | -0.085                     | 0.081        | 0.042        | 0.058        | 1.117             | 0.178        | 0.243                      | 0.191        |
| 12/4/2018 11:54 | -0.109                     | 0.081        | 0.025        | 0.056        | 1.147             | 0.178        | 0.381                      | 0.191        |
| 12/4/2018 11:55 |                            |              |              |              |                   |              |                            |              |
| 12/4/2018 11:56 | 0.195                      | 0.07         | 0.088        | 0.06         | 1.105             | 0.168        | 0.521                      | 0.183        |
| 12/4/2018 11:57 | 0.124                      | 0.076        | 0.071        | 0.055        | 1.106             | 0.173        | 0.442                      | 0.19         |
| 12/4/2018 11:58 | 0.038                      | 0.078        | 0.141        | 0.057        | 1.167             | 0.176        | 0.423                      | 0.189        |
| 12/4/2018 11:59 | 0.055                      | 0.078        | 0.057        | 0.053        | 1.223             | 0.178        | 0.51                       | 0.186        |
| 12/4/2018 12:00 | -0.016                     | 0.08         | 0.093        | 0.055        | 1.193             | 0.179        | 0.512                      | 0.193        |
| 12/4/2018 12:01 | -0.003                     | 0.078        | 0.044        | 0.056        | 1.111             | 0.178        | 0.325                      | 0.187        |
| 12/4/2018 12:03 | -0.049                     | 0.079        | 0.061        | 0.057        | 1.1               | 0.179        | 0.375                      | 0.191        |
| 12/4/2018 12:04 | -0.037                     | 0.08         | 0.078        | 0.056        | 1.105             | 0.177        | 0.326                      | 0.188        |
| 12/4/2018 12:05 | -0.038                     | 0.078        | 0.11         | 0.059        | 1.125             | 0.179        | 0.54                       | 0.188        |
| 12/4/2018 12:06 | 0.036                      | 0.081        | 0.072        | 0.055        | 1.135             | 0.18         | 0.435                      | 0.185        |
| 12/4/2018 12:07 | 0.077                      | 0.078        | 0.027        | 0.056        | 1.167             | 0.179        | 0.633                      | 0.189        |
| 12/4/2018 12:08 | 0.035                      | 0.079        | 0.067        | 0.055        | 1.138             | 0.178        | 0.51                       | 0.189        |
| 12/4/2018 12:09 | 0.054                      | 0.081        | 0.05         | 0.058        | 1.174             | 0.178        | 0.46                       | 0.198        |
| 12/4/2018 12:10 | -0.037                     | 0.081        | 0.091        | 0.054        | 1.182             | 0.179        | 0.413                      | 0.187        |
| 12/4/2018 12:11 | -0.026                     | 0.081        | 0.015        | 0.058        | 1.219             | 0.181        | 0.492                      | 0.19         |
| 12/4/2018 12:12 | -0.055                     | 0.081        | 0.015        | 0.058        | 1.237             | 0.181        | 0.429                      | 0.193        |
| 12/4/2018 12:13 | -0.084                     | 0.084        | 0.043        | 0.056        | 1.257             | 0.18         | 0.344                      | 0.192        |
| 12/4/2018 12:14 | -0.076                     | 0.082        | 0.021        | 0.056        | 1.225             | 0.182        | 0.583                      | 0.184        |
| 12/4/2018 12:15 | -0.092                     | 0.083        | 0.11         | 0.056        | 1.243             | 0.181        | 0.424                      | 0.197        |
| 12/4/2018 12:16 | 0.003                      | 0.08         | 0.027        | 0.053        | 1.257             | 0.181        | 0.289                      | 0.189        |
| 12/4/2018 12:17 | 0.089                      | 0.079        | 0.032        | 0.057        | 1.269             | 0.18         | 0.366                      | 0.189        |
| 12/4/2018 12:18 | 0.092                      | 0.078        | 0.056        | 0.054        | 1.266             | 0.182        | 0.316                      | 0.184        |
| 12/4/2018 12:19 | 0.067                      | 0.078        | 0.07         | 0.058        | 1.246             | 0.18         | 0.24                       | 0.189        |
| 12/4/2018 12:20 | -0.02                      | 0.078        | -0.002       | 0.06         | 1.25              | 0.18         | 0.358                      | 0.194        |
| 12/4/2018 12:21 | -0.016                     | 0.08         | 0.101        | 0.059        | 1.27              | 0.178        | 0.032                      | 0.195        |
| 12/4/2018 12:22 | -0.081                     | 0.08         | 0.077        | 0.059        | 1.228             | 0.18         | -0.008                     | 0.194        |
| 12/4/2018 12:23 | -0.101                     | 0.08         | 0.013        | 0.057        | 1.25              | 0.18         | 0.133                      | 0.202        |
| 12/4/2018 12:24 | -0.048                     | 0.08         | 0.081        | 0.059        | 1.267             | 0.181        | 0.085                      | 0.196        |
| 12/4/2018 12:25 | -0.108                     | 0.042        | 0.08         | 0.046        | 0.292             | 2.17         | 0.183                      | 0.172        |



|         | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCl<br>(ppm) | SEC<br>(ppm) | Methanol<br>(ppm) | SEC<br>(ppm) | acet-<br>aldehyde<br>(ppm) | SEC<br>(ppm) |
|---------|----------------------------|--------------|--------------|--------------|-------------------|--------------|----------------------------|--------------|
|         | <b>-0.096</b>              | <b>0.071</b> | <b>0.030</b> | <b>0.055</b> | <b>1.036</b>      | <b>0.323</b> | <b>0.133</b>               | <b>0.189</b> |
|         | <b>0.142</b>               |              | <b>0.110</b> |              | <b>1.036</b>      |              | <b>0.379</b>               |              |
| 1:04 PM | -0.22                      | 0.064        | 0.103        | 0.053        | 0.881             | 0.15         | 0.13                       | 0.178        |
| 1:05 PM | -0.159                     | 0.068        | 0.104        | 0.057        | 0.882             | 0.153        | 0.123                      | 0.188        |
| 1:06 PM | -0.137                     | 0.067        | 0.101        | 0.058        | 0.896             | 0.155        | 0.017                      | 0.191        |
| 1:07 PM | -0.146                     | 0.065        | 0.054        | 0.053        | 0.934             | 0.154        | -0.152                     | 0.181        |
| 1:08 PM | -0.076                     | 0.065        | 0.067        | 0.054        | 0.933             | 0.156        | -0.026                     | 0.184        |
| 1:09 PM | 0.003                      | 0.068        | 0.112        | 0.061        | 0.879             | 0.153        | 0.02                       | 0.191        |
| 1:10 PM | 0.027                      | 0.069        | 0.136        | 0.056        | 0.961             | 0.157        | -0.028                     | 0.187        |
| 1:11 PM | -0.01                      | 0.069        | 0.123        | 0.056        | 0.984             | 0.158        | 0.247                      | 0.188        |
| 1:12 PM | -0.098                     | 0.07         | 0.058        | 0.06         | 1.012             | 0.163        | 0.048                      | 0.191        |
| 1:13 PM | -0.104                     | 0.071        | 0.061        | 0.06         | 1.027             | 0.164        | 0.043                      | 0.196        |
| 1:14 PM | -0.129                     | 0.072        | 0.147        | 0.057        | 1.021             | 0.168        | 0.174                      | 0.193        |
| 1:15 PM | -0.138                     | 0.073        | 0.028        | 0.057        | 1.026             | 0.168        | 0.131                      | 0.19         |
| 1:16 PM | -0.126                     | 0.072        | 0.101        | 0.057        | 1.072             | 0.172        | 0.192                      | 0.187        |
| 1:17 PM | -0.185                     | 0.071        | 0.056        | 0.055        | 1.078             | 0.172        | 0.095                      | 0.182        |
| 1:18 PM | -0.122                     | 0.073        | 0.075        | 0.057        | 1.097             | 0.174        | 0.072                      | 0.19         |
| 1:19 PM | -0.054                     | 0.075        | 0.06         | 0.054        | 1.11              | 0.174        | 0.17                       | 0.189        |
| 1:20 PM | 0.033                      | 0.074        | -0.01        | 0.053        | 1.121             | 0.172        | 0.212                      | 0.191        |
| 1:21 PM | -0.044                     | 0.075        | 0.063        | 0.057        | 1.127             | 0.175        | -0.035                     | 0.196        |
| 1:22 PM | -0.115                     | 0.075        | 0.042        | 0.058        | 1.151             | 0.176        | 0.331                      | 0.193        |
| 1:23 PM | -0.084                     | 0.075        | 0.083        | 0.055        | 1.17              | 0.175        | 0.208                      | 0.187        |
| 1:24 PM | -0.132                     | 0.075        | -0.007       | 0.058        | 1.152             | 0.176        | 0.45                       | 0.196        |
| 1:25 PM | -0.179                     | 0.077        | 0.019        | 0.058        | 1.229             | 0.177        | 0.299                      | 0.193        |
| 1:26 PM | -0.129                     | 0.075        | 0.015        | 0.058        | 1.18              | 0.175        | 0.097                      | 0.192        |
| 1:27 PM | -0.123                     | 0.069        | 0.003        | 0.056        | 1.069             | 0.168        | -0.005                     | 0.182        |
| 1:28 PM | -0.092                     | 0.069        | -0.003       | 0.059        | 1.028             | 0.164        | 0.024                      | 0.19         |
| 1:29 PM | -0.077                     | 0.069        | 0.015        | 0.057        | 1.008             | 0.163        | 0.295                      | 0.19         |
| 1:30 PM | 0.021                      | 0.068        | 0.092        | 0.055        | 1.089             | 0.167        | 0.371                      | 0.187        |
| 1:31 PM | 0.004                      | 0.071        | 0.027        | 0.058        | 1.129             | 0.168        | 0.044                      | 0.189        |
| 1:32 PM | -0.082                     | 0.069        | 0.059        | 0.06         | 1.179             | 0.17         | 0.03                       | 0.196        |
| 1:33 PM | -0.17                      | 0.072        | 0.111        | 0.056        | 1.183             | 0.173        | 0.046                      | 0.19         |
| 1:34 PM | -0.121                     | 0.073        | 0.055        | 0.057        | 1.16              | 0.173        | 0.023                      | 0.191        |
| 1:35 PM | -0.103                     | 0.073        | 0.098        | 0.057        | 1.151             | 0.174        | 0.029                      | 0.187        |
| 1:36 PM | -0.166                     | 0.074        | 0.073        | 0.056        | 1.136             | 0.175        | 0.068                      | 0.19         |
| 1:37 PM | -0.147                     | 0.074        | 0.052        | 0.057        | 1.206             | 0.174        | 0.085                      | 0.191        |
| 1:38 PM | -0.124                     | 0.076        | 0.022        | 0.06         | 1.169             | 0.177        | -0.01                      | 0.202        |
| 1:39 PM | -0.061                     | 0.075        | 0.051        | 0.056        | 1.197             | 0.176        | 0.017                      | 0.191        |
| 1:40 PM | 0                          | 0.075        | 0.028        | 0.056        | 1.196             | 0.178        | -0.005                     | 0.192        |
| 1:41 PM | 0.029                      | 0.079        | 0.081        | 0.059        | 1.23              | 0.178        | -0.037                     | 0.201        |
| 1:42 PM | -0.103                     | 0.078        | -0.026       | 0.055        | 1.247             | 0.18         | 0.1                        | 0.193        |
| 1:43 PM | -0.11                      | 0.079        | 0.031        | 0.057        | 1.282             | 0.18         | 0.021                      | 0.194        |
| 1:44 PM | -0.095                     | 0.08         | 0.021        | 0.057        | 1.283             | 0.181        | 0.059                      | 0.196        |
| 1:45 PM | -0.153                     | 0.08         | 0.008        | 0.057        | 1.269             | 0.181        | 0.071                      | 0.189        |
| 1:46 PM | -0.175                     | 0.08         | -0.013       | 0.057        | 1.257             | 0.18         | 0.044                      | 0.197        |
| 1:47 PM | -0.132                     | 0.079        | -0.032       | 0.055        | 1.227             | 0.182        | 0.105                      | 0.191        |
| 1:48 PM | -0.102                     | 0.079        | -0.042       | 0.061        | 1.223             | 0.183        | 0.291                      | 0.198        |
| 1:49 PM | -0.073                     | 0.075        | 0.012        | 0.055        | 1.191             | 0.18         | 0.132                      | 0.185        |
| 1:50 PM | -0.014                     | 0.077        | 0.038        | 0.057        | 1.175             | 0.18         | 0.004                      | 0.199        |
| 1:51 PM | -0.004                     | 0.076        | 0.052        | 0.055        | 1.165             | 0.18         | 0.307                      | 0.196        |
| 1:52 PM | -0.004                     | 0.073        | 0.009        | 0.059        | 1.105             | 0.177        | 0.191                      | 0.195        |
| 1:53 PM |                            |              |              |              |                   |              |                            |              |

|         | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCl<br>(ppm) | SEC<br>(ppm) | Methanol<br>(ppm) | SEC<br>(ppm) | acet-<br>aldehyde<br>(ppm) | SEC<br>(ppm) |
|---------|----------------------------|--------------|--------------|--------------|-------------------|--------------|----------------------------|--------------|
| 1:54 PM | -0.052                     | 0.076        | 0.092        | 0.058        | 1.185             | 0.181        | 0.1                        | 0.195        |
| 1:55 PM | -0.144                     | 0.079        | -0.012       | 0.057        | 1.172             | 0.183        | 0.121                      | 0.195        |
| 1:56 PM | -0.126                     | 0.077        | 0.006        | 0.056        | 1.188             | 0.182        | 0.173                      | 0.189        |
| 1:57 PM | -0.129                     | 0.079        | -0.039       | 0.06         | 1.218             | 0.184        | 0.111                      | 0.199        |
| 1:58 PM | -0.058                     | 0.08         | -0.019       | 0.057        | 1.233             | 0.184        | 0.396                      | 0.196        |
| 1:59 PM | -0.035                     | 0.081        | 0.009        | 0.057        | 1.272             | 0.185        | 0.085                      | 0.196        |
| 2:00 PM | 0.027                      | 0.08         | -0.01        | 0.058        | 1.308             | 0.185        | 0.425                      | 0.201        |
| 2:01 PM | 0.039                      | 0.08         | 0.031        | 0.058        | 1.323             | 0.188        | 0.223                      | 0.196        |
| 2:02 PM | 0.017                      | 0.081        | -0.026       | 0.053        | 1.321             | 0.185        | 0.28                       | 0.196        |
| 2:03 PM | -0.081                     | 0.081        | -0.028       | 0.057        | 1.273             | 0.186        | 0.32                       | 0.197        |
| 2:04 PM | -0.089                     | 0.077        | 0.001        | 0.057        | 1.298             | 0.185        | 0.14                       | 0.195        |
| 2:05 PM | -0.134                     | 0.076        | -0.019       | 0.055        | 1.283             | 0.186        | 0.296                      | 0.195        |
| 2:06 PM | -0.134                     | 0.078        | 0.027        | 0.057        | 1.221             | 0.185        | 0.254                      | 0.191        |
| 2:07 PM | -0.099                     | 0.076        | 0.033        | 0.057        | 1.247             | 0.184        | 0.203                      | 0.195        |
| 2:08 PM | -0.036                     | 0.076        | 0.032        | 0.053        | 1.246             | 0.183        | 0.156                      | 0.192        |
| 2:09 PM | 0.065                      | 0.077        | 0.054        | 0.058        | 1.253             | 0.184        | 0.315                      | 0.194        |
| 2:10 PM | 0.054                      | 0.075        | -0.035       | 0.053        | 1.276             | 0.186        | 0.209                      | 0.192        |
| 2:11 PM | 0.073                      | 0.075        | -0.029       | 0.054        | 1.286             | 0.185        | 0.088                      | 0.191        |
| 2:12 PM | -0.044                     | 0.041        | 0.04         | 0.045        | 0.307             | 2.087        | -0.151                     | 0.164        |
| 2:13 PM | -0.164                     | 0.026        | 0.005        | 0.033        | -0.319            | 3.134        | 0.054                      | 0.152        |
| 2:14 PM | -0.211                     | 0.026        | 0.005        | 0.034        | -0.333            | 3.148        | -0.136                     | 0.152        |
| 2:15 PM | -0.181                     | 0.027        | -0.012       | 0.035        | -0.36             | 3.136        | 0.012                      | 0.152        |
| 2:16 PM | -0.385                     | 0.043        | -0.06        | 0.038        | -0.137            | 0.802        | 0.268                      | 0.167        |
| 2:17 PM | -0.497                     | 0.052        | -0.055       | 0.048        | 0.039             | 0.034        | 0.358                      | 0.182        |
| 2:18 PM | -0.418                     | 0.051        | -0.142       | 0.044        | 0.192             | 0.036        | 0.376                      | 0.18         |
| 2:19 PM | 0.022                      | 0.074        | 0.024        | 0.057        | 1.235             | 0.175        | 0.197                      | 0.192        |

| Date    | Time | CTS Scan<br>(pathlength) | SEC<br>(ppm) | Cell<br>Pressure<br>(psi) | Cell<br>Temp<br>(deg C) | Deviation<br>from<br>Previous | Deviation<br>from<br>Average |
|---------|------|--------------------------|--------------|---------------------------|-------------------------|-------------------------------|------------------------------|
| 4-Dec   | 0736 | 8.19                     | 0.118        | 14.42                     | 181                     | NA                            | 0.1%                         |
| 4-Dec   | 1459 | 8.1962                   | 0.117        | 14.37                     | 181                     | -0.1%                         | -0.1%                        |
| Average |      | 8.191                    | 0.118        |                           |                         |                               |                              |

**APPENDIX I-D**  
**Methane Laboratory Report**

# Air Control Techniques, P.C.

301 East Durham Rd.  
Cary, NC 27513

ENV – Greenwood  
Project # 2333

Analytical Report  
(1218-052)

*EPA Method 18 (Bags)*  
Methane



**Enthalpy Analytical, LLC**

Phone: (919) 850 - 4392 / Fax: (919) 850 - 9012 / [www.enthalpy.com](http://www.enthalpy.com)  
800-1 Capitola Drive Durham, NC 27713-4385

I certify that to the best of my knowledge all analytical data presented in this report:

- Have been checked for completeness
- Are accurate, error-free, and legible
- Have been conducted in accordance with approved protocol, and that all deviations and analytical problems are summarized in the appropriate narrative(s)

This analytical report was prepared in Portable Document Format (.PDF) and contains ??? pages.

Report Issued: xx/xx/xxxx



# Summary of Results



## Enthalpy Analytical

Company: Air Control Techniques PC

Job No.: 1218-052 EPA Method 18 (Bags)

Client No.: 2333

### Summary Table - Methane

---

| <u>Sample ID</u>                    | <i>S1-M18-1</i> | <i>S1-M18-2</i> | <i>S1-M18-3</i> |
|-------------------------------------|-----------------|-----------------|-----------------|
| <u>Adjusted Concentration (ppm)</u> | 1.14 J          | 1.14 J          | 1.54 J          |

---

# Results

Enthalpy Analytical

Company: Air Control Techniques PC  
Job No.: 1218-052 EPA Method 18 (Bags)  
Client No.: 2333

Methane

| Sample ID   | Filename #1 | Filename #2 | Filename #3 | Inj1DateTime     | Analysis Method      | Curve Min | Curve Max | MDL   | Ret Time (min) | Ret Time (min) | Ret Time (min) | %dif RT | Conc #1 | Conc #2 | Conc #3 | %dif conc | DF | Avg Conc ppm | Spike Rec % | Adj. Conc ppm | Flag |
|-------------|-------------|-------------|-------------|------------------|----------------------|-----------|-----------|-------|----------------|----------------|----------------|---------|---------|---------|---------|-----------|----|--------------|-------------|---------------|------|
| S1-M18-1 SP | 022B0601.D  | 022B0602.D  | 022B0603.D  | 12-09-2018 14:20 | BETTP773_C1-C6_XAS.M | 5.00      | 49,920    | 0.816 | 1.38           | 1.38           | 1.38           | 0.0     | 13.6    | 13.3    | 13.1    | 1.7       | 1  | 13.3         |             |               |      |
| S1-M18-1    | 018B0101.D  | 018B0102.D  | 018B0103.D  | 12-07-2018 09:49 | BETTP773_C1-C7.M     | 5.00      | 49,920    | 0.816 | 1.38           | 1.38           | 1.38           | 0.1     | 1.01    | 1.01    | 0.982   | 1.8       | 1  | 1.00         | 87.5%       | 1.14          | J    |
| S1-M18-2    | 028B0201.D  | 028B0202.D  | 028B0203.D  | 12-07-2018 10:52 | BETTP773_C1-C7.M     | 5.00      | 49,920    | 0.816 | 1.38           | 1.38           | 1.38           | 0.0     | 0.994   | 0.998   | 1.01    | 1.0       | 1  | 1.00         | 87.5%       | 1.14          | J    |
| S1-M18-3    | 022B0301.D  | 022B0302.D  | 022B0303.D  | 12-07-2018 11:56 | BETTP773_C1-C7.M     | 5.00      | 49,920    | 0.816 | 1.38           | 1.38           | 1.38           | 0.0     | 1.33    | 1.36    | 1.36    | 1.4       | 1  | 1.35         | 87.5%       | 1.54          | J    |

## Enthalpy Analytical

Company: Air Control Techniques PC

Job No.: 1218-052 EPA Method 18 (Bags)

Client No.: 2333

## Spike Hold Times

| Spiked Bag         | Time Spiked      | Spike Analyzed   | Hold Time Hours | Related Bag     | Related Bag Sampled Date | Bag Analyzed     | Hold Time Hours |
|--------------------|------------------|------------------|-----------------|-----------------|--------------------------|------------------|-----------------|
| <b>S1-M18-1 SP</b> | 12-07-2018 12:25 | 12-09-2018 14:20 | 49.9            | <b>S1-M18-1</b> | 12-05-2018 09:00         | 12-07-2018 09:49 | 48.8            |
|                    |                  |                  |                 | <b>S1-M18-2</b> | 12-05-2018 11:00         | 12-07-2018 10:52 | 47.9            |
|                    |                  |                  |                 | <b>S1-M18-3</b> | 12-05-2018 12:30         | 12-07-2018 11:56 | 47.4            |

## Enthalpy Analytical

Company: Air Control Techniques PC

Job No.: 1218-052 EPA Method 18 (Bags)

Client No.: 2333

### Spiked Bag

| <i><b>S1-M18-1 SP</b></i> |                          | Methane      |
|---------------------------|--------------------------|--------------|
| Before Spiking            | Inj1 (ppmv)              | 1.01         |
|                           | Inj2 (ppmv)              | 1.01         |
|                           | Inj3 (ppmv)              | 0.982        |
|                           | Avg ppmv                 | 1.00         |
| Bag vol L NTP             |                          | 2.48         |
| Gas Spike                 | Cylinder                 | CC703691     |
|                           | Expires                  | 3/21/21      |
|                           | Press/Temp               | 764.8 / 68.0 |
|                           | Vol (mL)                 | 400          |
|                           | Cyl Dil Factor           | 1            |
|                           | Cyl Conc (ppmv)          | 102          |
|                           | Vol (mL NTP)             | 403          |
|                           |                          | 0.0411       |
| Totals                    | Sp Bag Vol L NTP         | 2.88         |
|                           | Corrected Initial (ppmv) | 0.860        |
|                           | Spike Amount (mL NTP)    | 0.0411       |
|                           | Spike Amount (ppmv)      | 14.2         |
|                           | Expected (ppmv)          | 15.1         |
| Result                    | Inj1 (ppmv)              | 13.6         |
|                           | Inj2 (ppmv)              | 13.3         |
|                           | Inj3 (ppmv)              | 13.1         |
|                           | Avg (ppmv)               | 13.3         |
| <b>Recovery</b>           |                          | <b>87.5%</b> |

# Narrative Summary

## Enthalpy Analytical Narrative Summary

|                 |                                 |
|-----------------|---------------------------------|
| <b>Company</b>  | Air Control Techniques PC       |
| <b>Job #</b>    | 1218-052 - EPA Method 18 (Bags) |
| <b>Client #</b> | 2333                            |

|                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Custody</b>                    | Matthew St. Lawrence of Enthalpy Analytical, LLC received the samples on 12/7/18 at ambient temperature after being relinquished by Air Control Techniques, PC. The samples were received in good condition. Prior to, during, and after analysis, the samples were kept under lock with access only to authorized personnel by Enthalpy Analytical, LLC.                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Analysis</b>                   | <p>The samples were analyzed for methane using the analytical procedures in EPA Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography (40 CFR Part 60, Appendix A).</p> <p>The standards and samples were analyzed following the procedures specified in section 8.2.1, Integrated Bag Sampling and Analysis.</p> <p>All samples and standards were introduced directly to the column using an automated multi-port Valco gas sampling valve equipped with a stainless steel loop. Methane was referenced to certified gas phase standards.</p> <p>The analyses were performed using the Agilent Technologies Model 6890N Gas Chromatograph "Betty" (S/N US10430048) equipped with a Flame Ionization Detector.</p> |
| <b>Calibration</b>                | <p>The calibration curves are located in the Raw Data section of this report and referenced in the Analysis Method column on the Detailed Results page.</p> <p>For each calibration curve used, the first page of the curve contains all method specific parameters (i.e., curve type, origin, weight, etc.) used to quantify the samples. The calibration curve section also includes a table with the Retention Time (RetTime), Level (Lvl), Amount (corresponding units), Area, Response Factor (Amt/Area) and the analyte Name. The calibration table is used to identify (by retention time) and quantify each target compound.</p>                                                                                                         |
| <b>Chromatographic Conditions</b> | The acquisition method GC142P133_CAL.M is included in the Raw Data section of this report.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |





## Enthalpy Analytical Narrative Summary

(continued)

### QC Notes

As required by the method, a recovery study was performed on a bag sample. The bag sample ***SI-M18-1*** was spiked on 12/7/18 at 12:25 PM. The recovery efficiency value met the method-required limits of 70 to 130%. The recovery efficiency value was used to adjust the results following equation 18-7 of Method 18.

The analysis of the laboratory method blank did not contain methane at a concentration greater than the detection limit.

### Reporting Notes

These analyses met the requirements of the TNI Standard. Any deviations from the requirements of the reference method or TNI Standard have been stated above.

The results presented in this report are representative of the samples as provided to the laboratory.

## General Reporting Notes

The following are general reporting notes that are applicable to all Enthalpy Analytical, LLC data reports, unless specifically noted otherwise.

- Any analysis which refers to the method as “**Type**” represents a planned deviation from the reference method. For instance a Hydrogen Sulfide assay from a Tedlar bag would be labeled as “EPA Method 16-Type” because Tedlar bags are not mentioned as one of the collection options in EPA Method 16.
- The acronym **MDL** represents the Minimum Detection Limit. Below this value the laboratory cannot determine the presence of the analyte of interest reliably.
- The acronym **LOQ** represents the Limit of Quantification. Below this value the laboratory cannot quantitate the analyte of interest within the criteria of the method.
- The acronym **ND** following a value indicates a non-detect or analytical result below the MDL.
- The letter **J** in the Qualifier or Flag column in the results indicates that the value is between the MDL and the LOQ. The laboratory can positively identify the analyte of interest as present, but the value should be considered an estimate.
- The letter **E** in the Qualifier or Flag column indicates an analytical result exceeding 100% of the highest calibration point. The associated value should be considered as an estimate.
- Sample results are presented ‘as measured’ for single injection methodologies, or an average value if multiple injections are made. If all injections are below the MDL, the sample is considered non-detect and the ND value is presented. If one, but not all, are below the MDL, the MDL value is used for any injections that are below the MDL. For example, if the MDL is 0.500 and LOQ is 1.00, and the instrument measures 0.355, 0.620, and 0.442 - the result reported is the average of 0.500, 0.620, and 0.500 - - - i.e. 0.540 with a J flag.
- When a spike recovery (Bag Spike, Collocated Spike Train, or liquid matrix spike) is being calculated, the native (unspiked) sample result is used in the calculations, as long as the value is above the MDL. If a sample is ND, then 0 is used as the native amount (not the MDL value).
- The acronym **DF** represents Dilution Factor. This number represents dilution of the sample during the preparation and/or analysis process. The analytical result taken from a laboratory instrument is multiplied by the DF to determine the final undiluted sample results.
- The addition of **MS** to the Sample ID represents a Matrix Spike. An aliquot of an actual sample is spiked with a known amount of analyte so that a percent recovery value can be determined. The MS analysis indicates what effect the sample matrix may have on the target analyte, i.e. whether or not anything in the sample matrix interferes with the analysis of the analyte(s).



## General Reporting Notes

(continued)

- The addition of **MSD** to the Sample ID represents a Matrix Spike Duplicate. Prepared in the same manner as a MS, the use of duplicate matrix spikes allows further confirmation of laboratory quality by showing the consistency of results gained by performing the same steps multiple times.
- The addition of **LD** to the Sample ID represents a Laboratory Duplicate. The analyst prepares an additional aliquot of sample for testing and the results of the duplicate analysis are compared to the initial result. The result should have a difference value of within 10% of the initial result (if the results of the original analysis are greater than the LOQ).
- The addition of **AD** to the Sample ID represents an Alternate Dilution. The analyst prepares an additional aliquot at a different dilution factor (usually double the initial factor). This analysis helps confirm that no additional compound is present and coeluting or sharing absorbance with the analyte of interest, as they would have a different response/absorbance than the analyte of interest.
- The Sample ID **LCS** represents a Laboratory Control Sample. Clean matrix, similar to the client sample matrix, prepared and analyzed by the laboratory using the same reagents, spiking standards and procedures used for the client samples. The LCS is used to assess the control of the laboratory's analytical system. Whenever spikes are prepared for our client projects, two spikes are retained as LCSs. The LCSs are labeled with the associated project number and kept in-house at the appropriate temperature conditions. When the project samples are received for analysis, the LCSs are analyzed to confirm that the analyte could be recovered from the media, separate from the samples which were used on the project and which may have been affected by source matrix, sample collection, and/or sample transport.
- **Significant Figures:** Where the reported value is much greater than unity (1.00) in the units expressed, the number is rounded to a whole number of units, rather than to 3 significant figures. For example, a value of 10,456.45 ug catch is rounded to 10,456 ug. There are five significant digits displayed, but no confidence should be placed on more than two significant digits. In the case of small numbers, generally 3 significant figures are presented, but still only 2 should be used with confidence. Many neat materials are only certified to 3 digits, and as the mathematically correct final result is always 1 digit less than all its pre-cursors - 2 significant figures are what are most defensible.
- **Manual Integration:** The data systems used for processing will flag manually integrated peaks with an "M". There are several reasons a peak may be manually integrated. These reasons will be identified by the following two letter designations on sample chromatograms, if provided in the report. The peak was *not integrated* by the software "**NI**", the peak was *integrated incorrectly* by the software "**II**" or the *wrong peak* was integrated by the software "**WP**". These codes will accompany the analyst's manual integration stamp placed next to the compound name on the chromatogram.



# Sample Custody

Ambient 9 cm

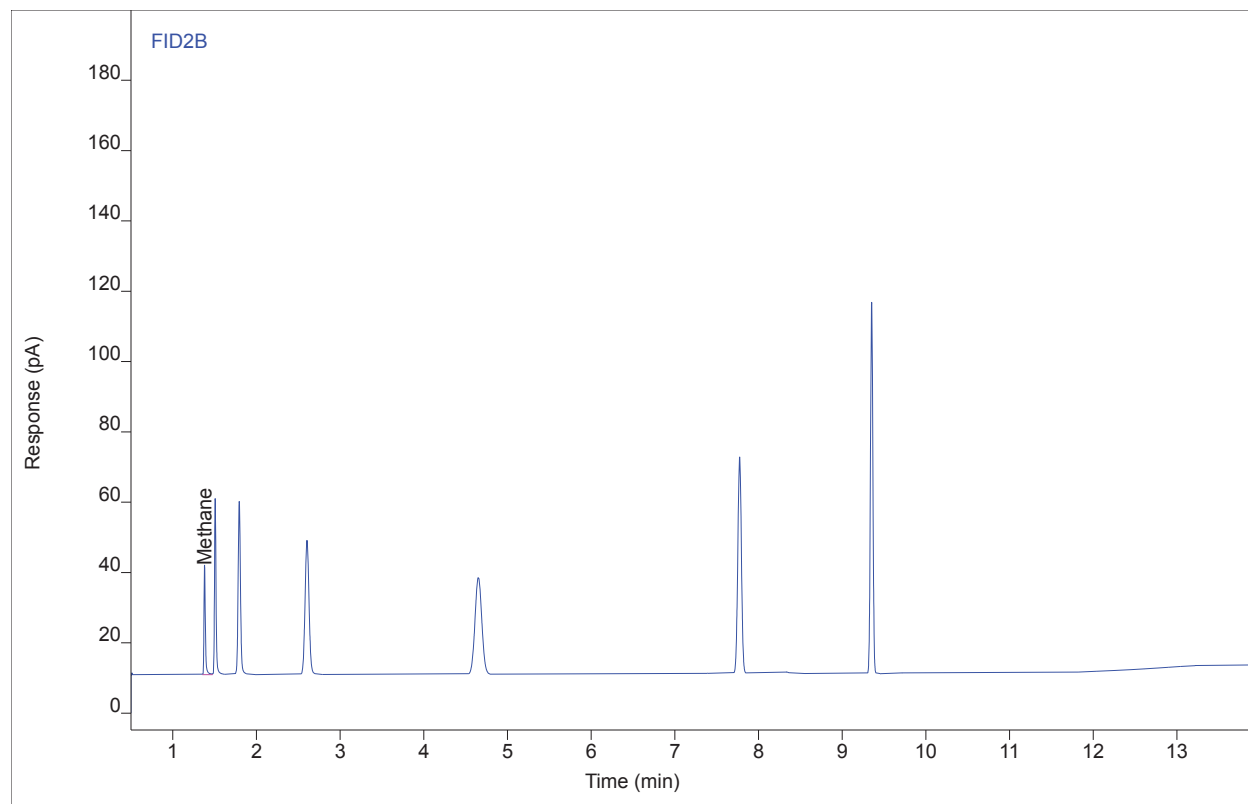
# Raw Data

# Chromatogram Report

Sample Name BettyP919 #C4 ENV(1=0,4=400)  
Sequence Name BETTYP972A ver.3  
Inj Data File 025B1001.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/7/2018 8:04 AM  
File Modified 12/7/2018 10:03 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 25  
Injection Volume 250  
Injection 1 of 3  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C6\_XAS.M  
Method Modified 12/5/2018 7:48 AM  
Printed 12/11/2018 3:48 PM



| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.38 | 36.3358 | 31.0564 | 102.866 | 1  | 102.866 | ppm  |

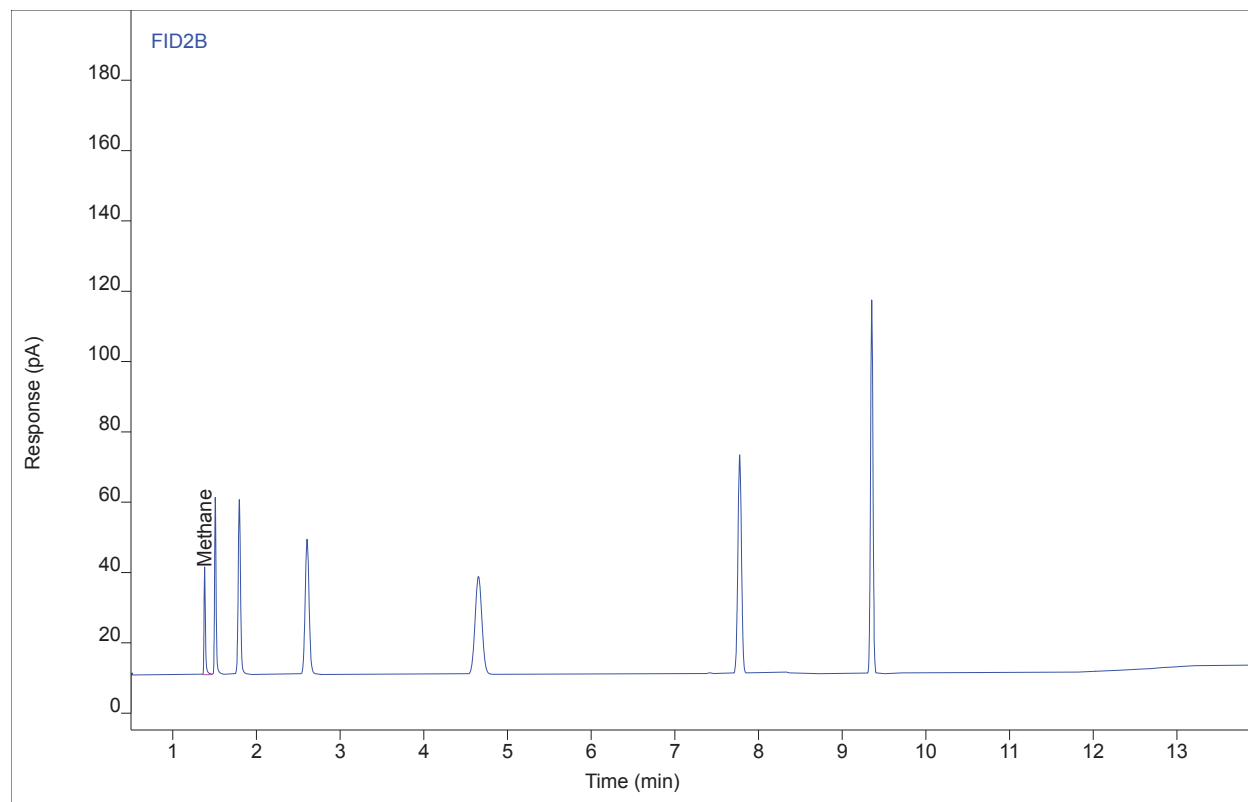


# Chromatogram Report

Sample Name BettyP919 #C4 ENV(1=0,4=400)  
Sequence Name BETTYP972A ver.3  
Inj Data File 025B1002.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/7/2018 8:28 AM  
File Modified 12/7/2018 10:03 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type  
Vial Number Vial 25  
Injection Volume 250  
Injection 2 of 3  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C6\_XAS.M  
Method Modified 12/5/2018 7:48 AM  
Printed 12/11/2018 3:48 PM



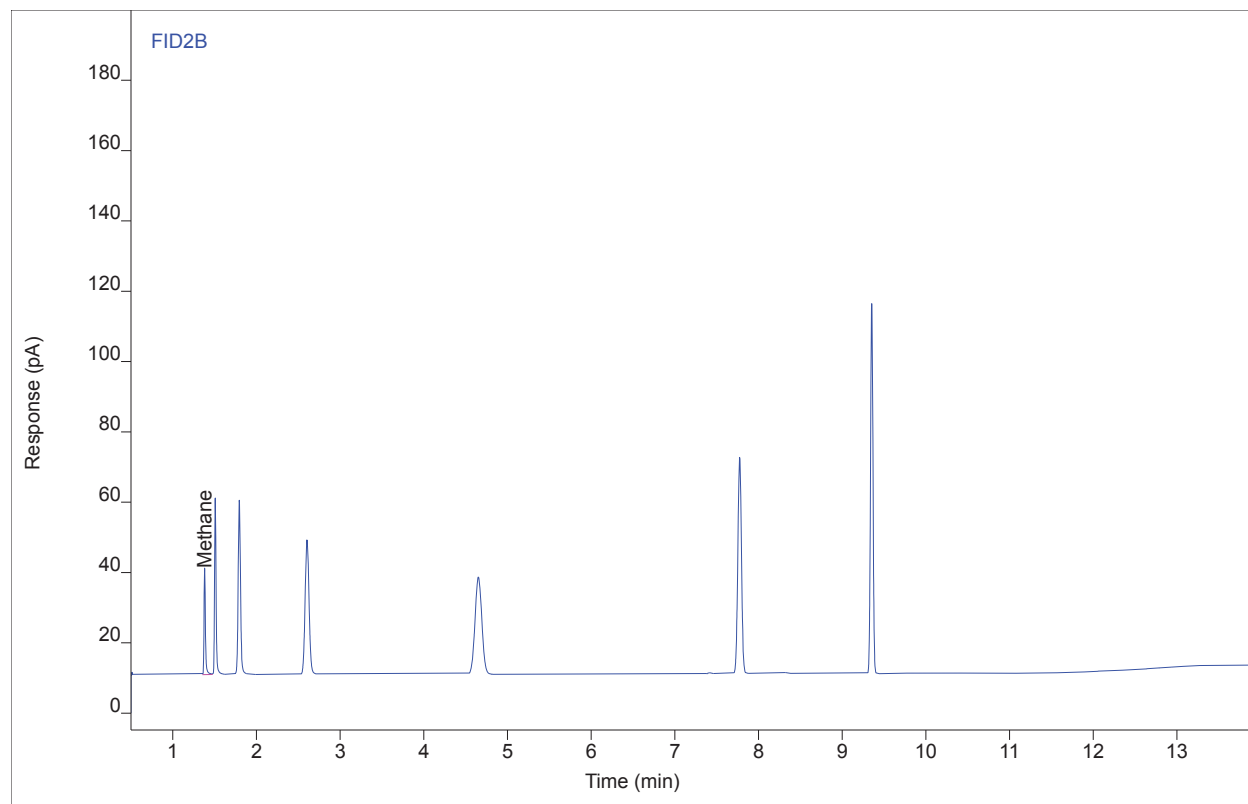
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.38 | 35.8488 | 30.6070 | 101.483 | 1  | 101.483 | ppm  |

# Chromatogram Report

Sample Name BettyP919 #C4 ENV(1=0,4=400)  
Sequence Name BETTYP972A ver.3  
Inj Data File 025B1003.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/7/2018 8:53 AM  
File Modified 12/7/2018 10:03 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 25  
Injection Volume 250  
Injection 3 of 3  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C6\_XAS.M  
Method Modified 12/5/2018 7:48 AM  
Printed 12/11/2018 3:48 PM



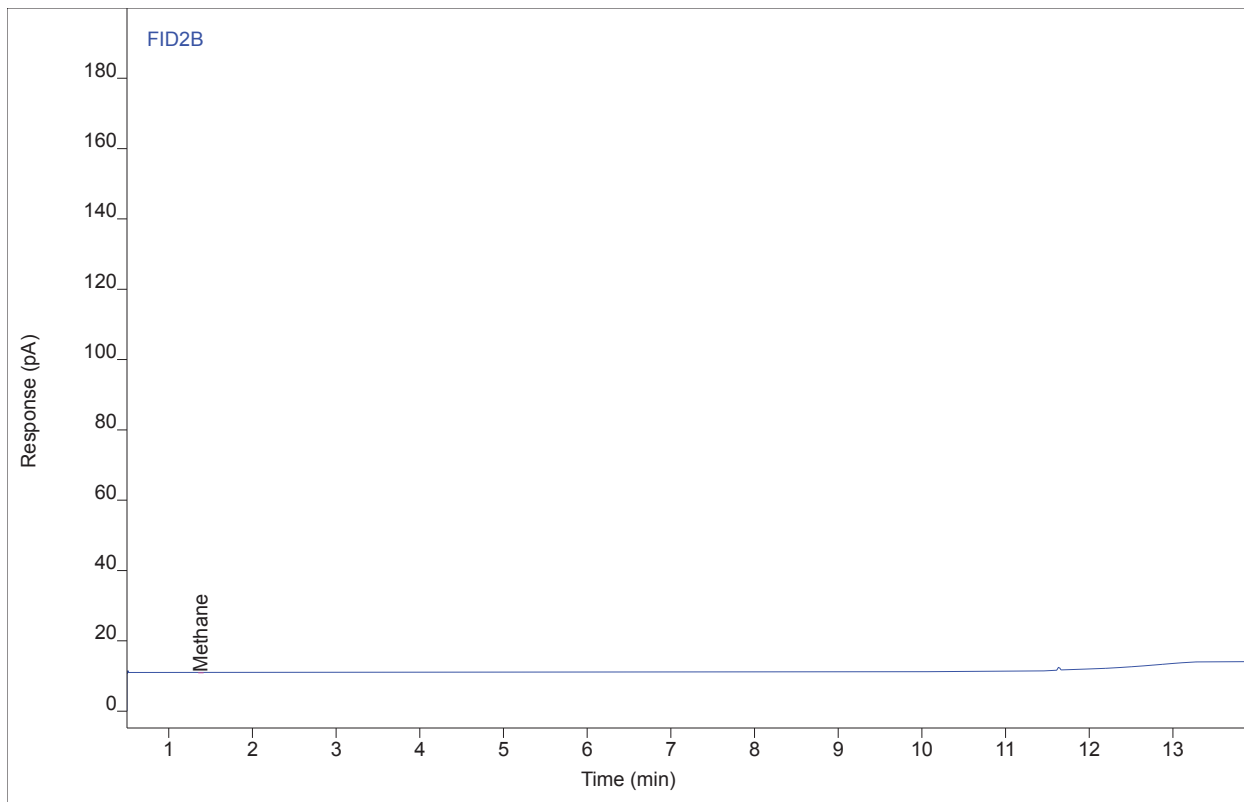
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.38 | 35.3424 | 30.2869 | 100.046 | 1  | 100.046 | ppm  |

# Chromatogram Report

Sample Name 1218-052.S1-M18-1.Bag  
Sequence Name BETTYP973 ver.1  
Inj Data File 018B0101.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/7/2018 9:49 AM  
File Modified 12/8/2018 12:52 PM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 18  
Injection Volume 250  
Injection 1 of 3  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 11/29/2018 8:27 AM  
Printed 12/11/2018 3:48 PM



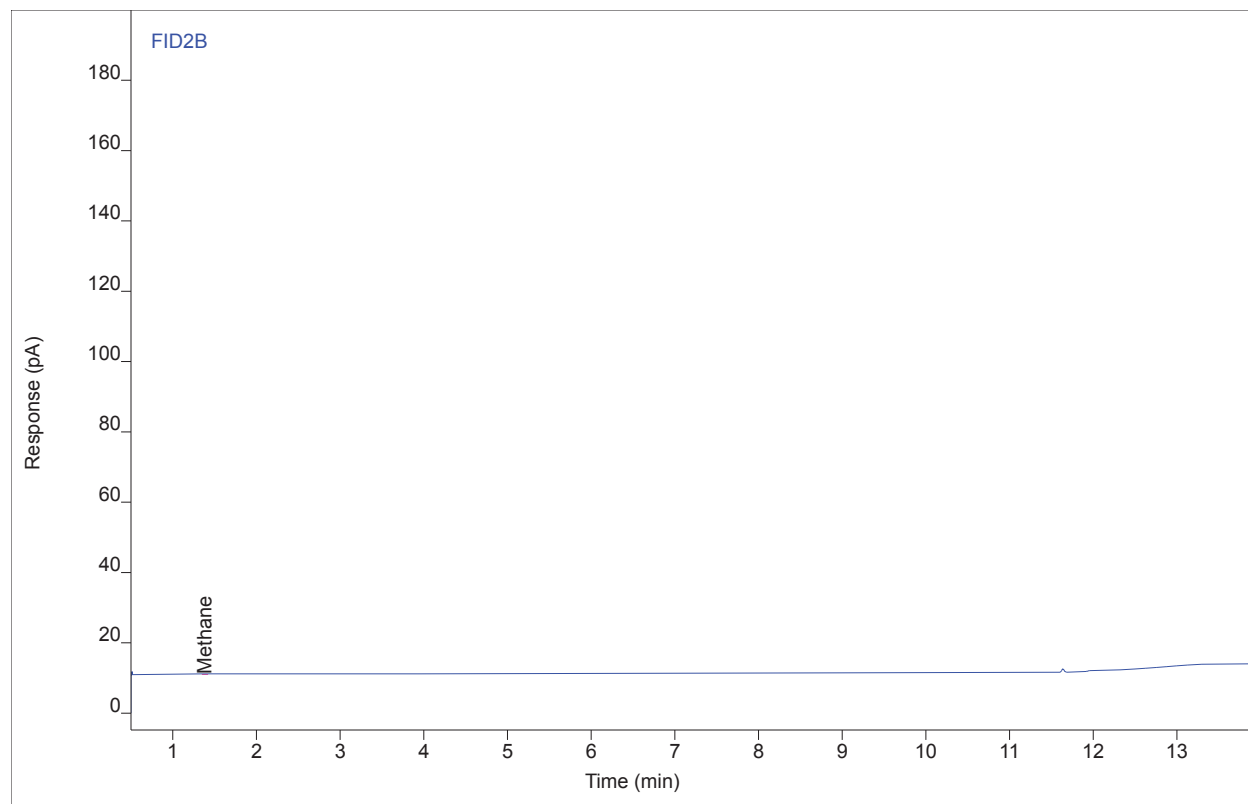
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BP   | 1.38 | 0.37460 | 0.25832 | 1.00827 | 1  | 1.00827 | ppm  |

# Chromatogram Report

Sample Name 1218-052.S1-M18-1.Bag  
Sequence Name BETTYP973 ver.1  
Inj Data File 018B0102.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/7/2018 10:10 AM  
File Modified 12/8/2018 12:52 PM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 18  
Injection Volume 250  
Injection 2 of 3  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 11/29/2018 8:27 AM  
Printed 12/11/2018 3:48 PM



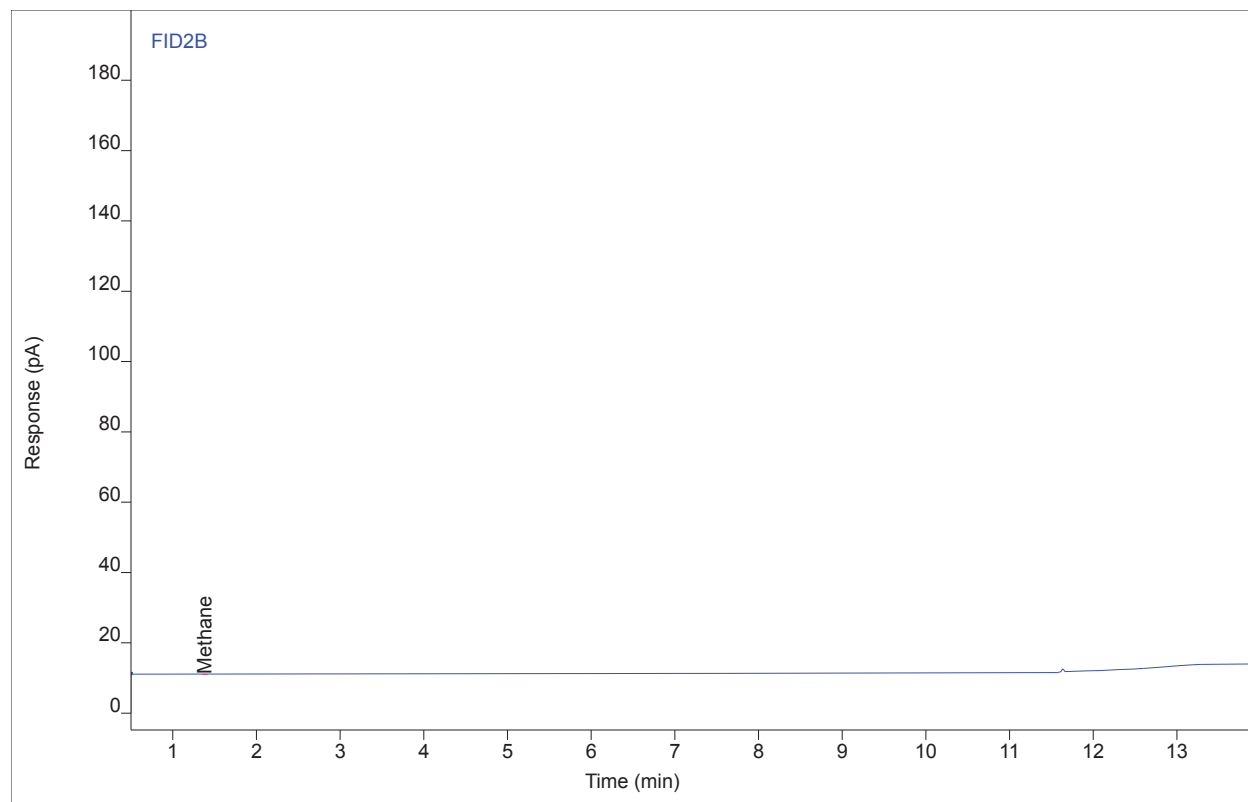
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.38 | 0.37466 | 0.26582 | 1.00845 | 1  | 1.00845 | ppm  |

# Chromatogram Report

Sample Name 1218-052.S1-M18-1.Bag  
Sequence Name BETTYP973 ver.1  
Inj Data File 018B0103.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/7/2018 10:31 AM  
File Modified 12/8/2018 12:52 PM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 18  
Injection Volume 250  
Injection 3 of 3  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 11/29/2018 8:27 AM  
Printed 12/11/2018 3:48 PM



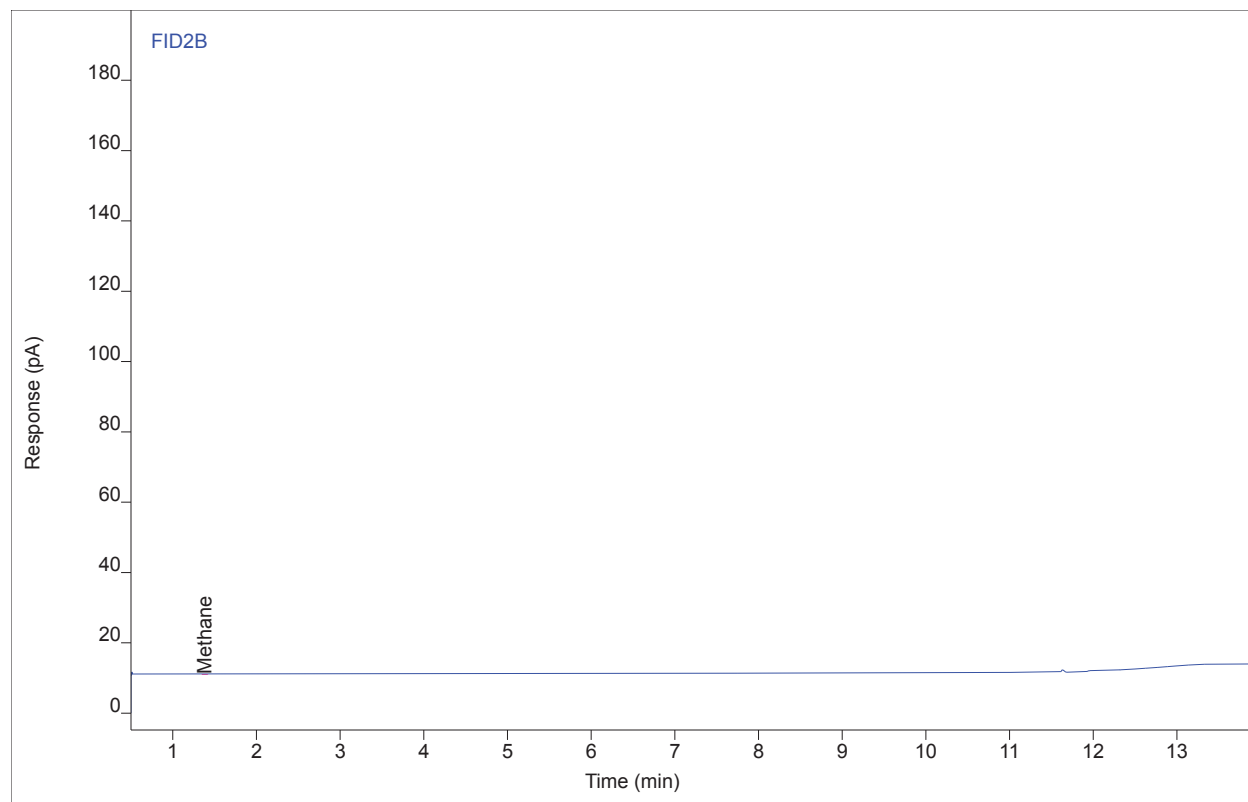
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BP   | 1.38 | 0.36487 | 0.26314 | 0.98210 | 1  | 0.98210 | ppm  |

# Chromatogram Report

Sample Name 1218-052.S1-M18-2.Bag  
Sequence Name BETTYP973 ver.1  
Inj Data File 028B0201.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/7/2018 10:52 AM  
File Modified 12/8/2018 12:52 PM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 28  
Injection Volume 250  
Injection 1 of 3  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 11/29/2018 8:27 AM  
Printed 12/11/2018 3:48 PM



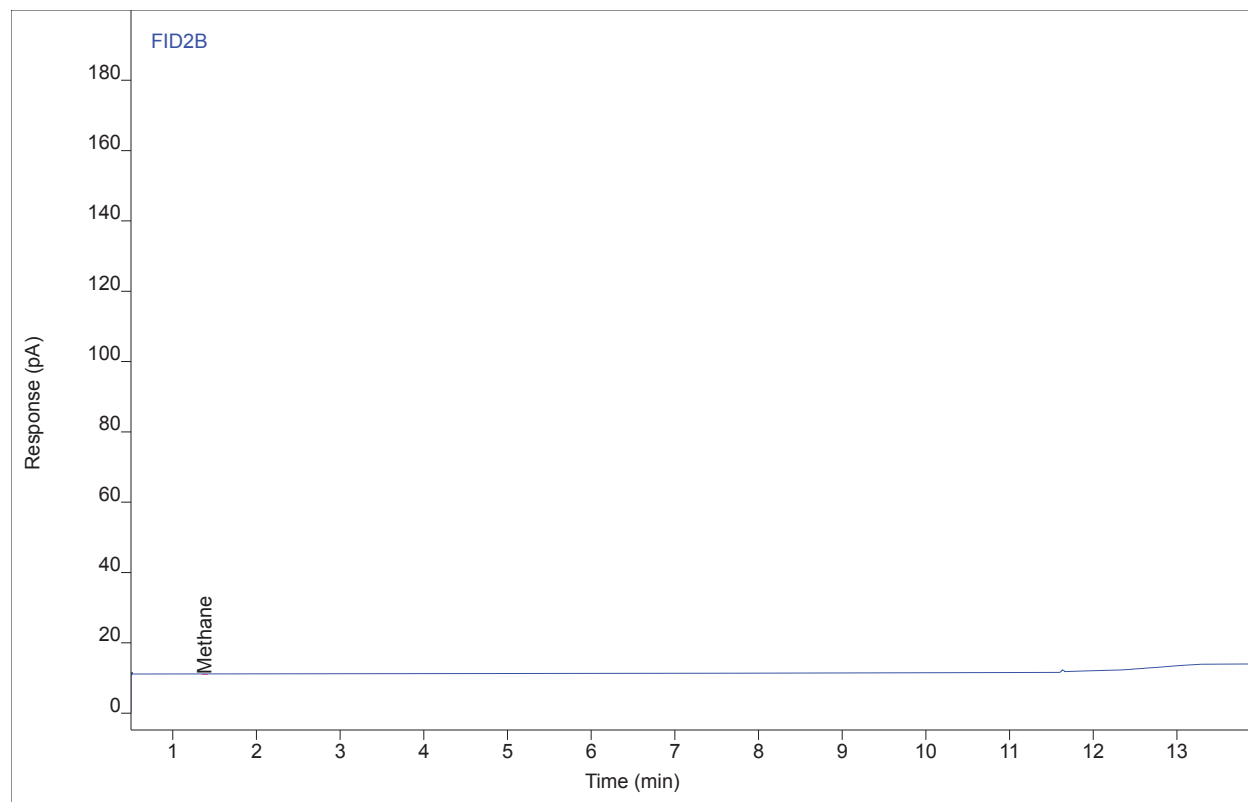
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.38 | 0.36927 | 0.25297 | 0.99394 | 1  | 0.99394 | ppm  |

# Chromatogram Report

Sample Name 1218-052.S1-M18-2.Bag  
Sequence Name BETTYP973 ver.1  
Inj Data File 028B0202.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/7/2018 11:13 AM  
File Modified 12/8/2018 12:52 PM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 28  
Injection Volume 250  
Injection 2 of 3  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 11/29/2018 8:27 AM  
Printed 12/11/2018 3:48 PM



| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.38 | 0.37092 | 0.24652 | 0.99837 | 1  | 0.99837 | ppm  |

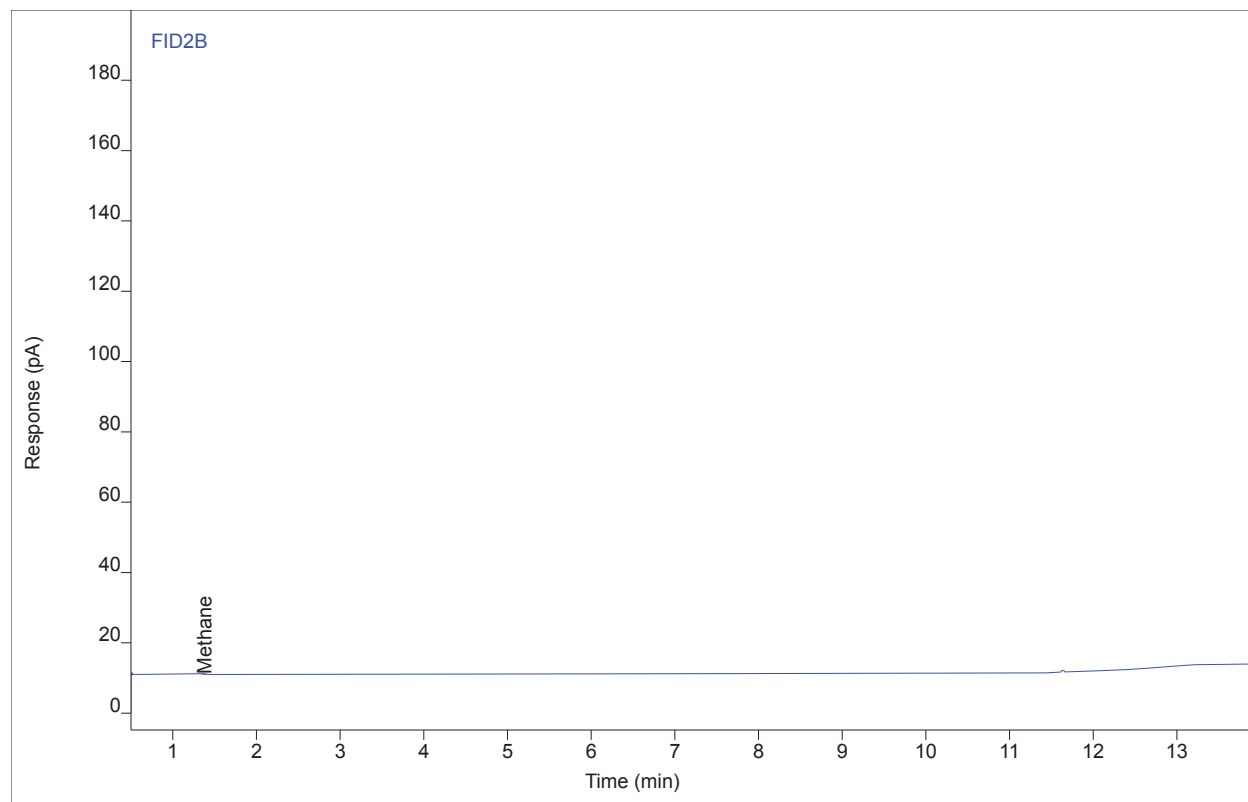


# Chromatogram Report

Sample Name 1218-052.S1-M18-2.Bag  
Sequence Name BETTYP973 ver.1  
Inj Data File 028B0203.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/7/2018 11:35 AM  
File Modified 12/8/2018 12:52 PM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 28  
Injection Volume 250  
Injection 3 of 3  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 11/29/2018 8:27 AM  
Printed 12/11/2018 3:48 PM



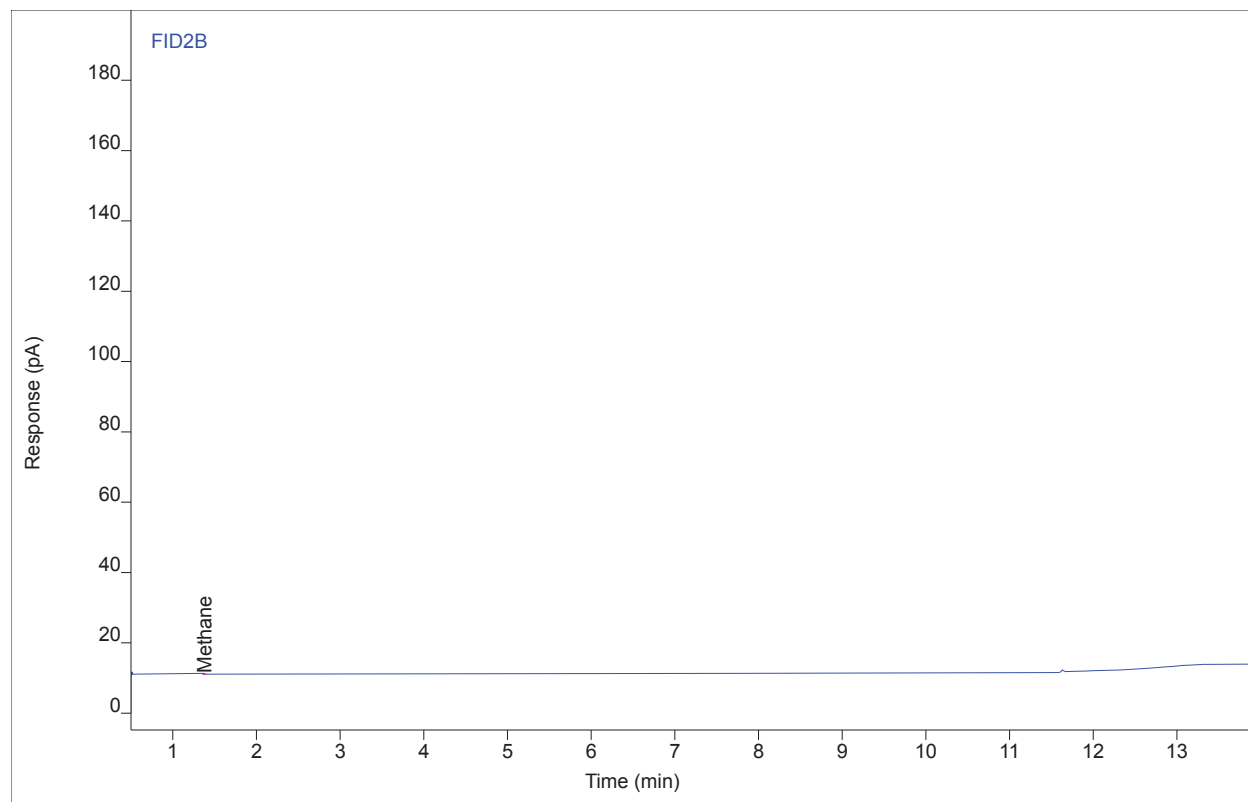
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.38 | 0.37563 | 0.24302 | 1.01105 | 1  | 1.01105 | ppm  |

# Chromatogram Report

Sample Name 1218-052.S1-M18-3.Bag  
Sequence Name BETTYP973 ver.1  
Inj Data File 022B0301.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/7/2018 11:56 AM  
File Modified 12/8/2018 12:52 PM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 22  
Injection Volume 250  
Injection 1 of 3  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 11/29/2018 8:27 AM  
Printed 12/11/2018 3:48 PM



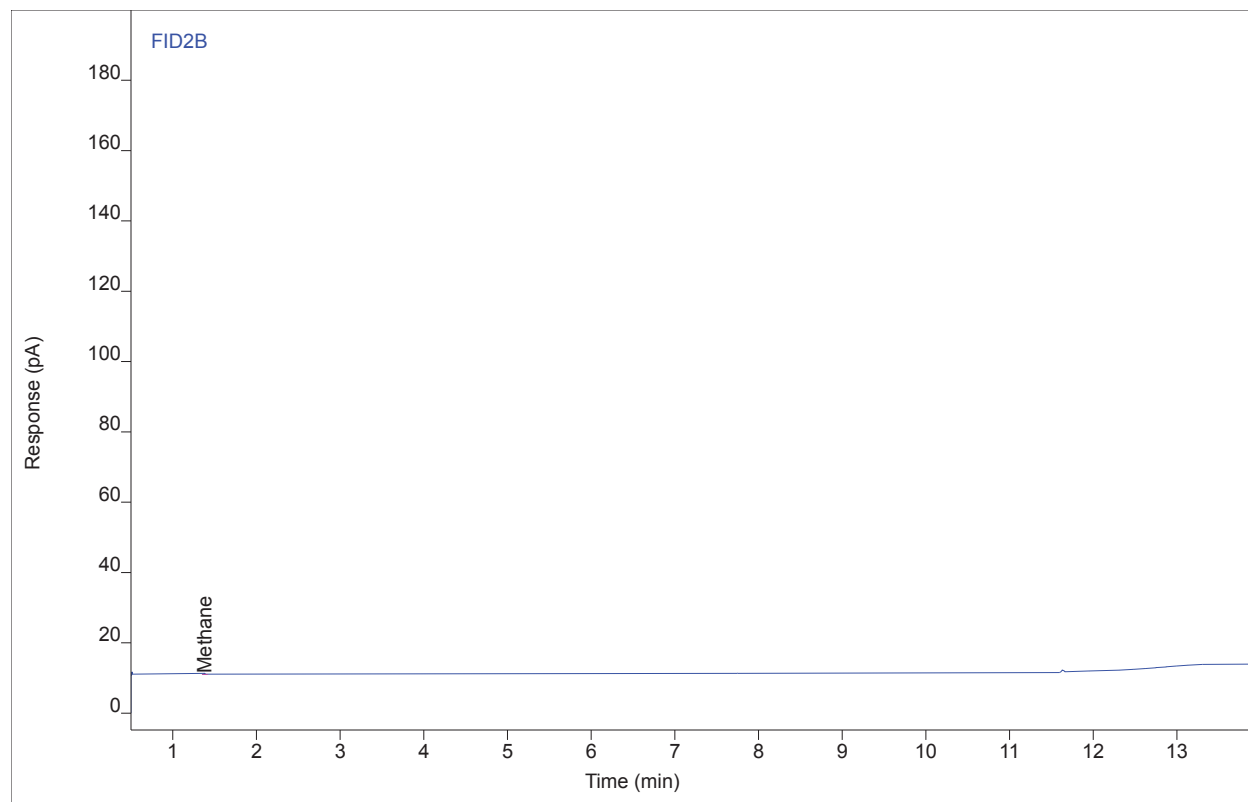
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.38 | 0.49498 | 0.37440 | 1.33229 | 1  | 1.33229 | ppm  |

# Chromatogram Report

Sample Name 1218-052.S1-M18-3.Bag  
Sequence Name BETTYP973 ver.1  
Inj Data File 022B0302.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/7/2018 12:17 PM  
File Modified 12/8/2018 12:52 PM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 22  
Injection Volume 250  
Injection 2 of 3  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 11/29/2018 8:27 AM  
Printed 12/11/2018 3:48 PM



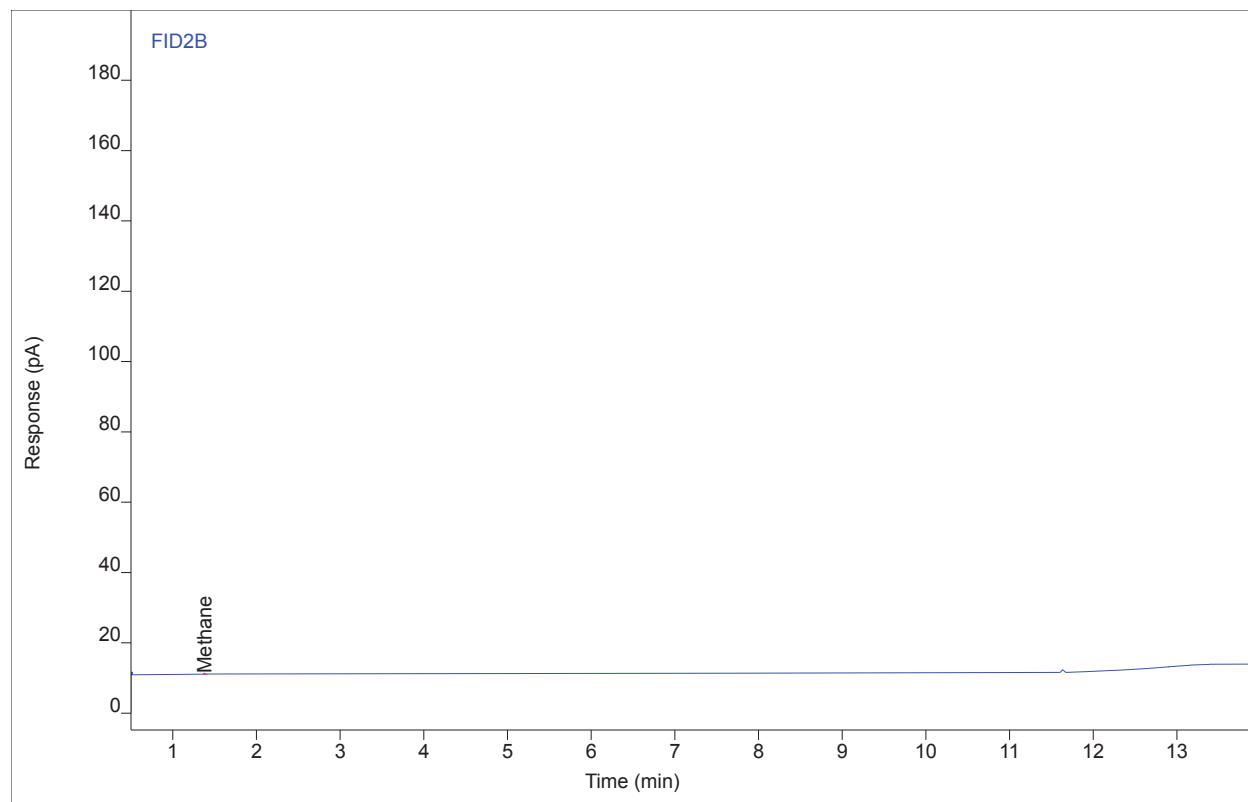
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.38 | 0.50399 | 0.37497 | 1.35655 | 1  | 1.35655 | ppm  |

# Chromatogram Report

Sample Name 1218-052.S1-M18-3.Bag  
Sequence Name BETTYP973 ver.1  
Inj Data File 022B0303.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/7/2018 12:38 PM  
File Modified 12/8/2018 12:52 PM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 22  
Injection Volume 250  
Injection 3 of 3  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 11/29/2018 8:27 AM  
Printed 12/11/2018 3:48 PM



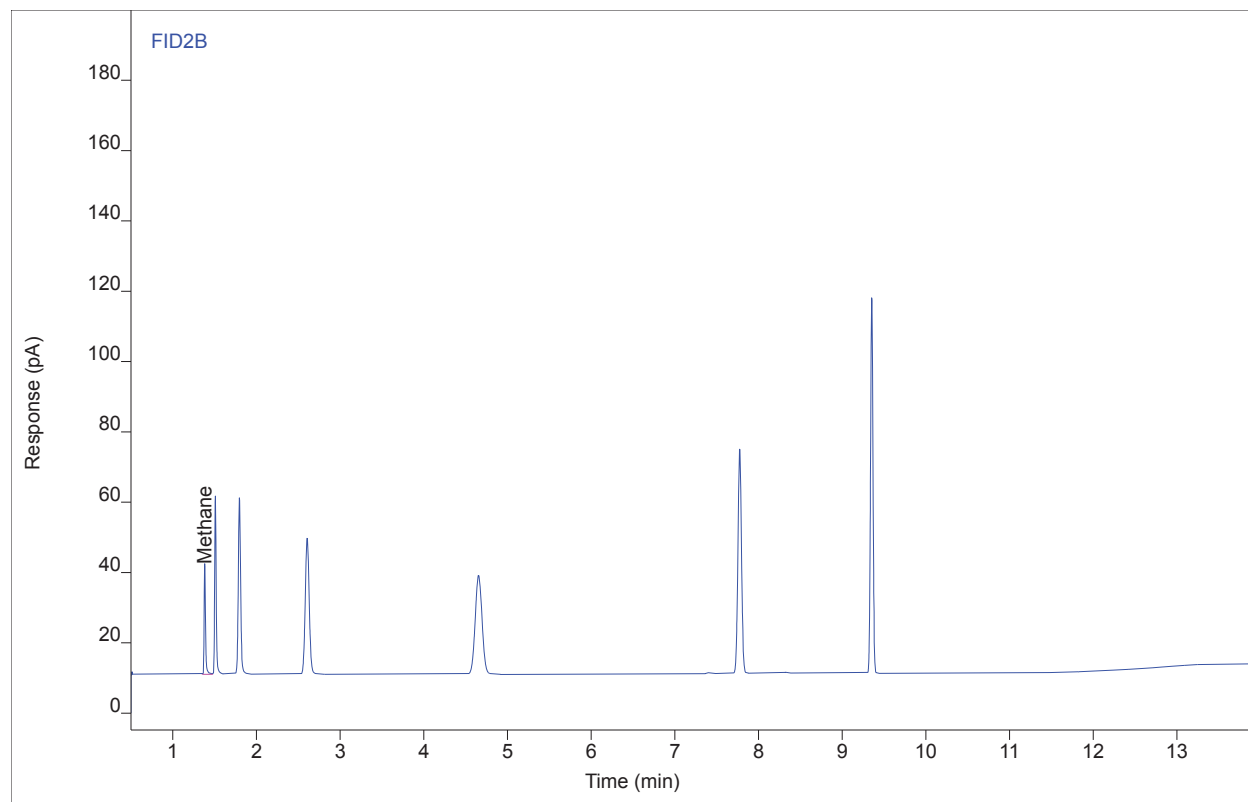
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.38 | 0.50690 | 0.38260 | 1.36439 | 1  | 1.36439 | ppm  |

# Chromatogram Report

Sample Name BettyP919 #C4 ENV(1=0,4=400)  
Sequence Name BETTYP973 ver.1  
Inj Data File 025B0701.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/8/2018 11:21 AM  
File Modified 12/8/2018 12:53 PM  
Instrument  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 25  
Injection Volume 250  
Injection 1 of 3  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 11/29/2018 8:27 AM  
Printed 12/11/2018 3:48 PM



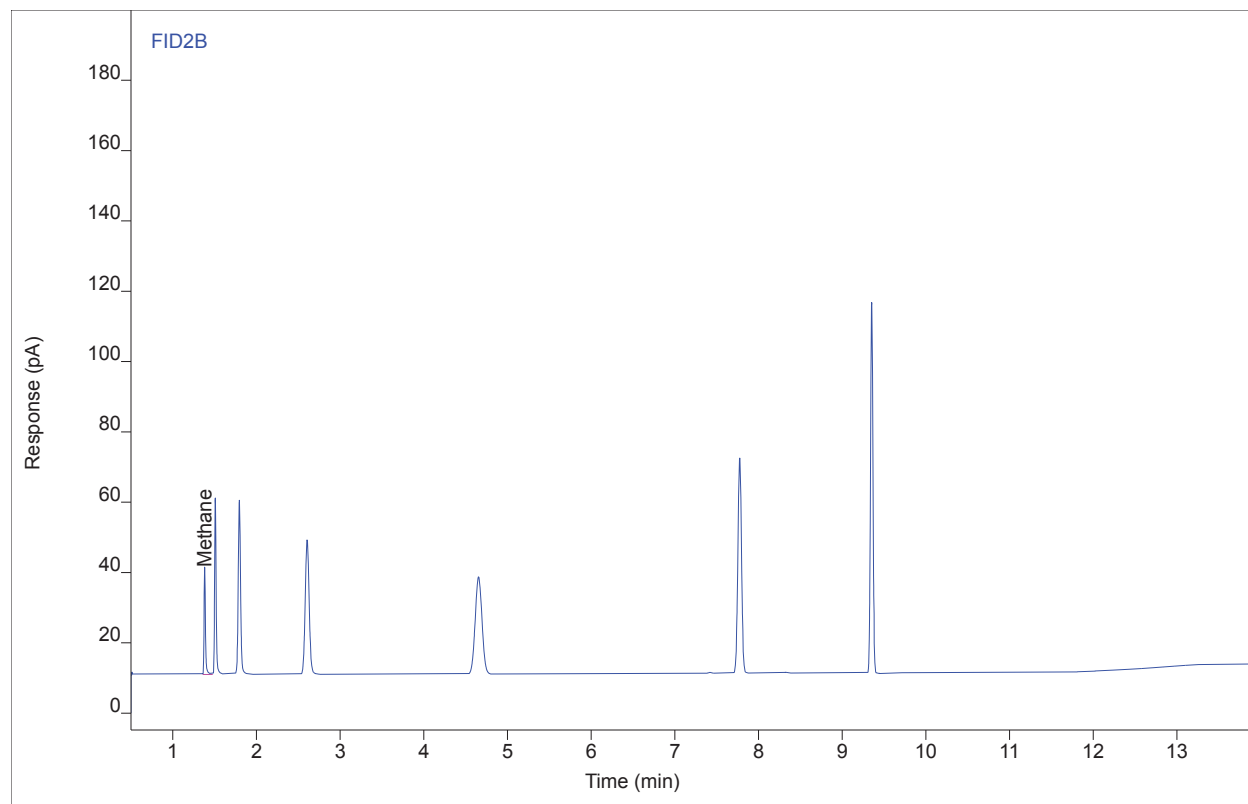
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.38 | 36.9312 | 31.3982 | 104.556 | 1  | 104.556 | ppm  |

# Chromatogram Report

Sample Name BettyP919 #C4 ENV(1=0,4=400)  
Sequence Name BETTYP973 ver.1  
Inj Data File 025B0702.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/8/2018 11:45 AM  
File Modified 12/8/2018 12:53 PM  
Instrument  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 25  
Injection Volume 250  
Injection 2 of 3  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 11/29/2018 8:27 AM  
Printed 12/11/2018 3:48 PM



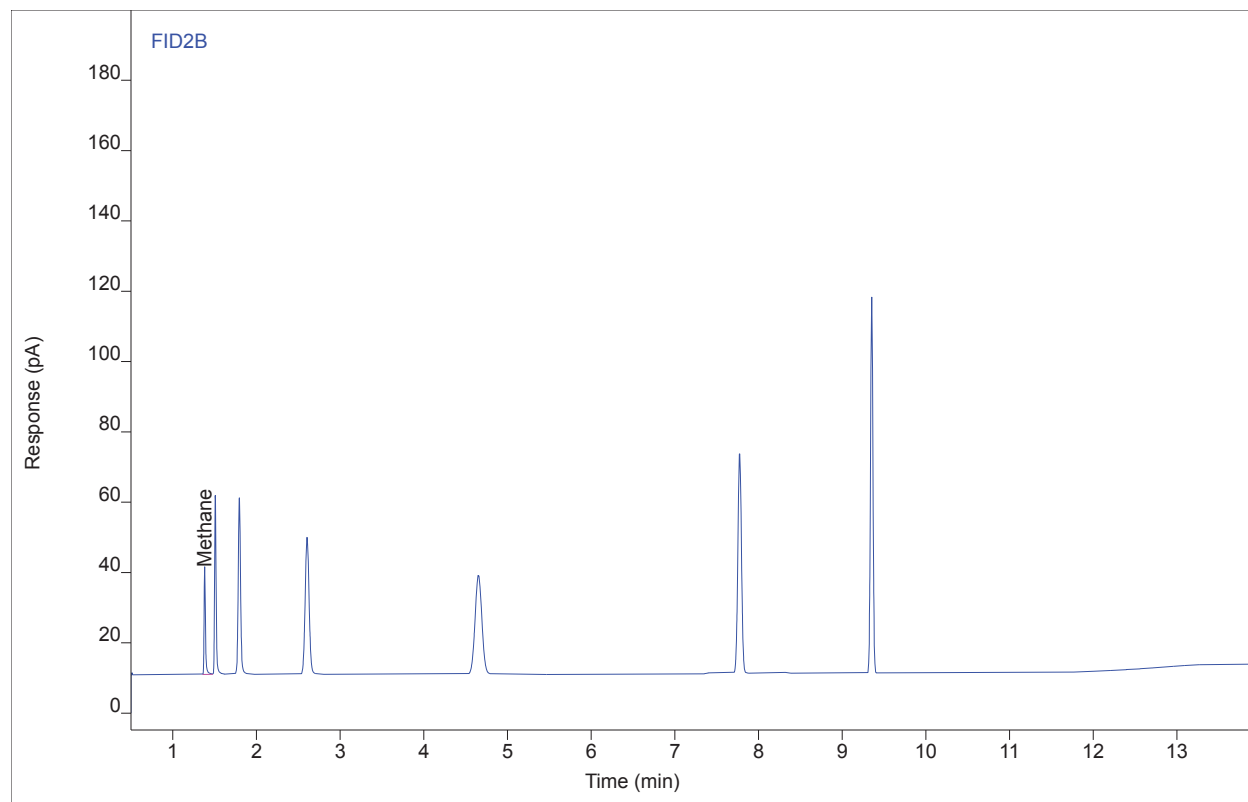
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.38 | 35.6187 | 30.5179 | 100.830 | 1  | 100.830 | ppm  |

# Chromatogram Report

Sample Name BettyP919 #C4 ENV(1=0,4=400)  
Sequence Name BETTYP973 ver.1  
Inj Data File 025B0703.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/8/2018 12:09 PM  
File Modified 12/8/2018 12:53 PM  
Instrument  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 25  
Injection Volume 250  
Injection 3 of 3  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 11/29/2018 8:27 AM  
Printed 12/11/2018 3:48 PM



| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.38 | 35.8770 | 30.5883 | 101.564 | 1  | 101.564 | ppm  |

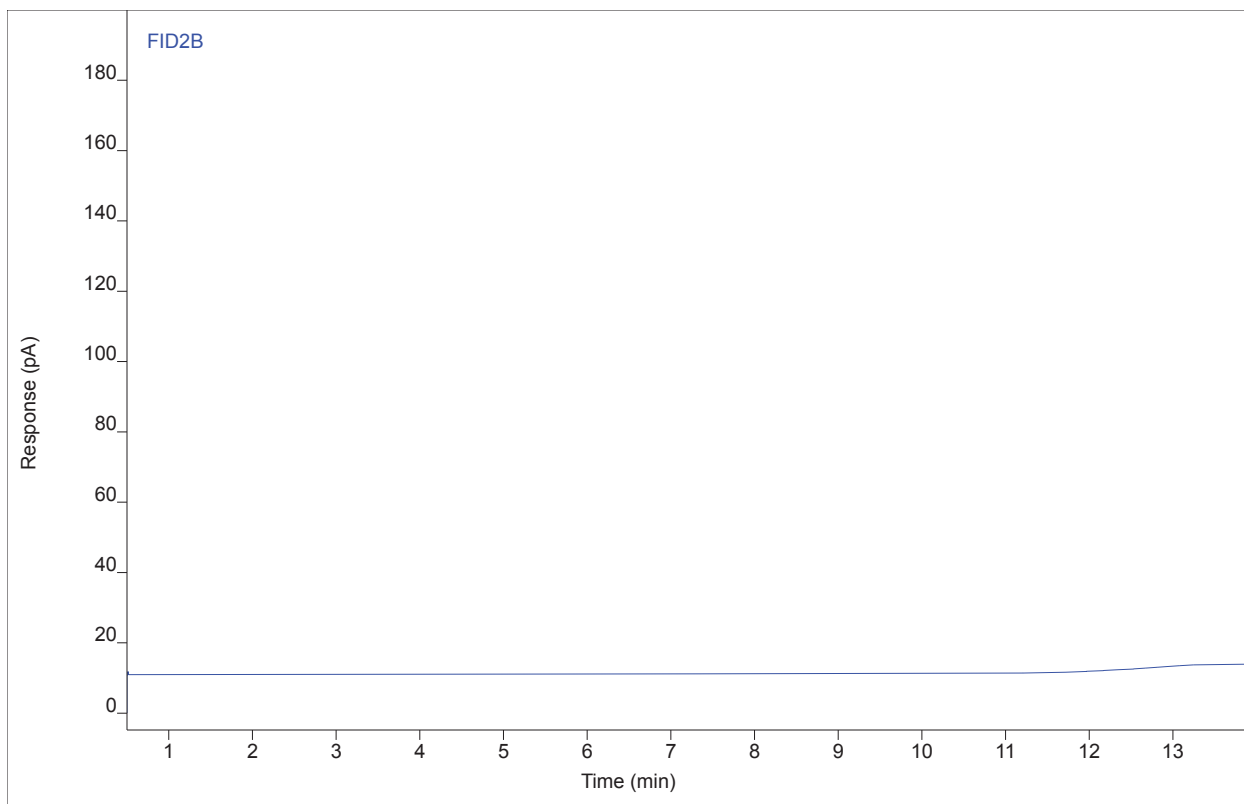


# Chromatogram Report

Sample Name BettyP374 Method Blank 1 #MB  
Sequence Name BETTYP974 ver.2  
Inj Data File 017B0102.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/8/2018 1:25 PM  
File Modified 12/11/2018 10:09 AM  
Instrument Betty  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Control  
Vial Number Vial 17  
Injection Volume 250  
Injection 2 of 4  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C6\_XAS.M  
Method Modified 12/5/2018 7:48 AM  
Printed 12/11/2018 3:48 PM



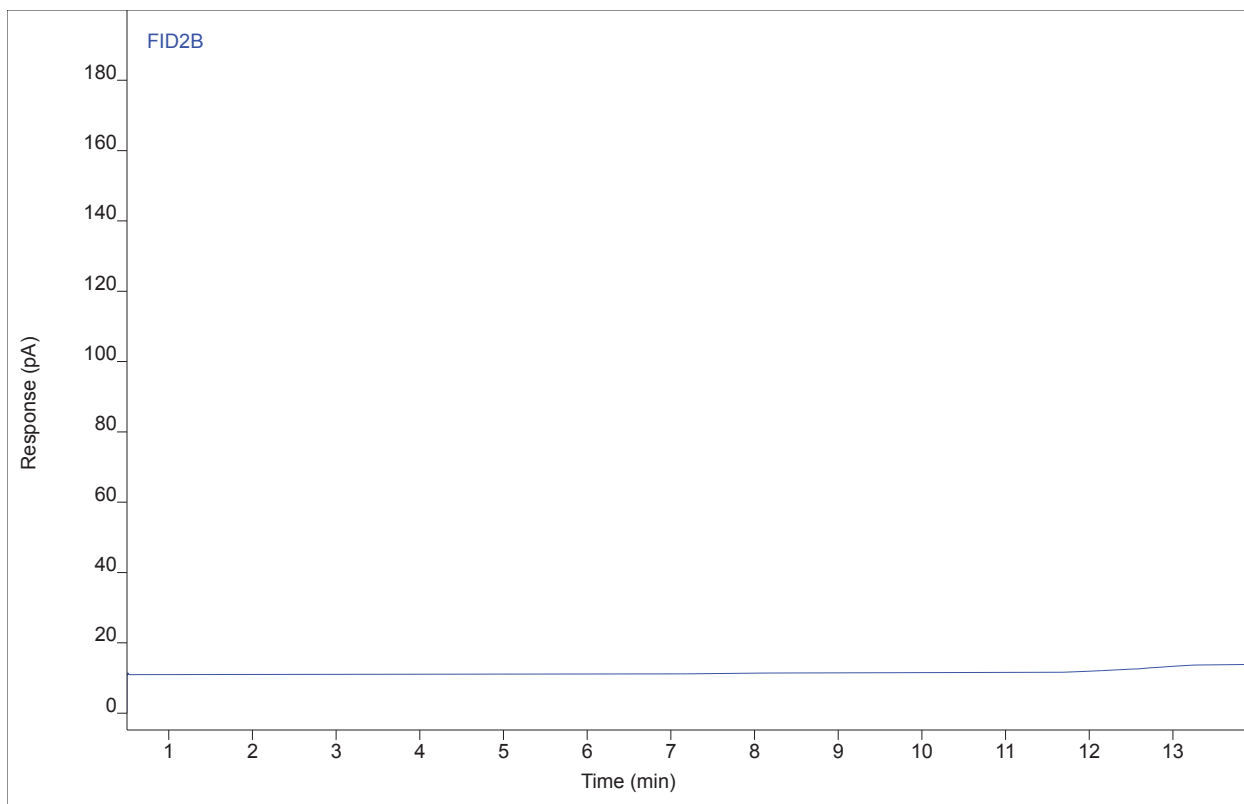
| Compound | Type | RT     | Area | Height | Amount | DF | SampAmt | Unit |
|----------|------|--------|------|--------|--------|----|---------|------|
| Methane  |      | (1.37) |      |        |        | 1  |         |      |

# Chromatogram Report

Sample Name BettyP374 Method Blank 1 #MB  
Sequence Name BETTYP974 ver.2  
Inj Data File 017B0103.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/8/2018 1:46 PM  
File Modified 12/11/2018 10:09 AM  
Instrument Betty  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Control  
Vial Number Vial 17  
Injection Volume 250  
Injection 3 of 4  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C6\_XAS.M  
Method Modified 12/5/2018 7:48 AM  
Printed 12/11/2018 3:48 PM



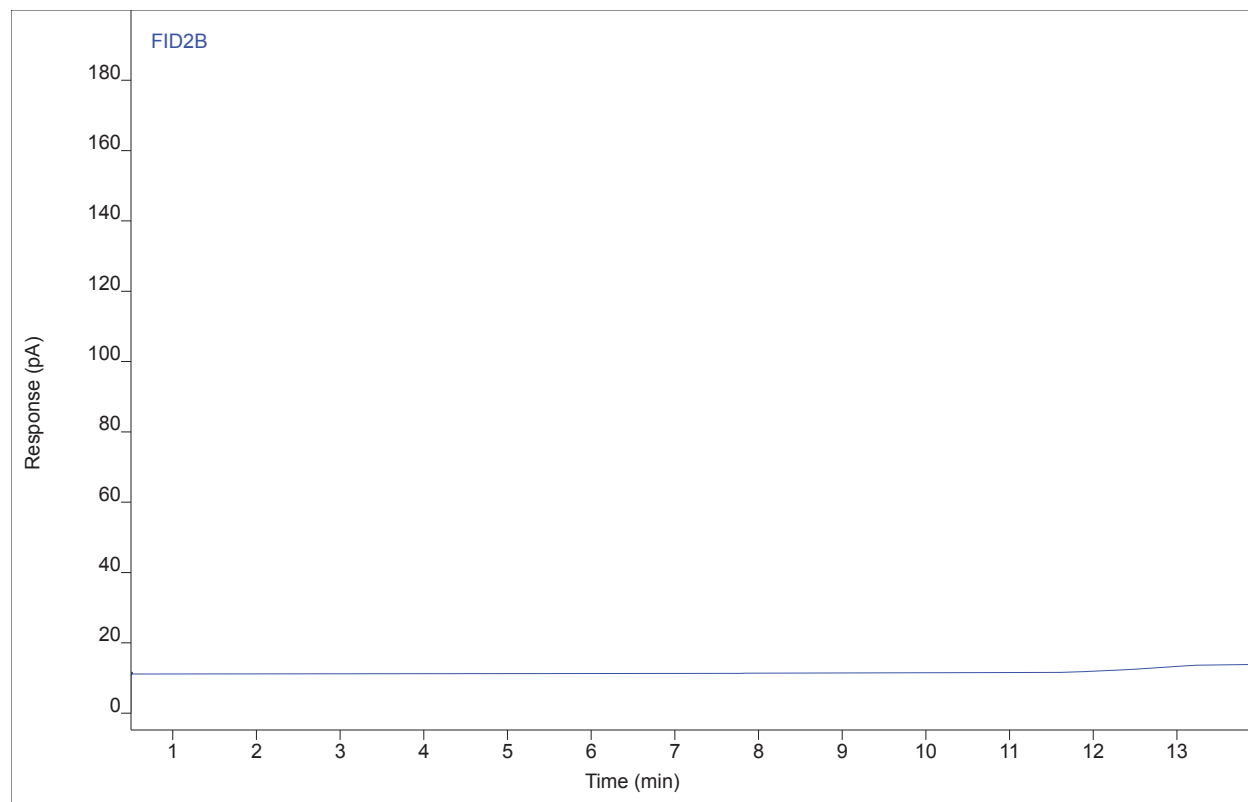
| Compound | Type | RT     | Area | Height | Amount | DF | SampAmt | Unit |
|----------|------|--------|------|--------|--------|----|---------|------|
| Methane  |      | (1.37) |      |        |        | 1  |         |      |

# Chromatogram Report

Sample Name BettyP374 Method Blank 1 #MB  
Sequence Name BETTYP974 ver.2  
Inj Data File 017B0104.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/8/2018 2:07 PM  
File Modified 12/11/2018 10:09 AM  
Instrument Betty  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Control  
Vial Number Vial 17  
Injection Volume 250  
Injection 4 of 4  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C6\_XAS.M  
Method Modified 12/5/2018 7:48 AM  
Printed 12/11/2018 3:48 PM



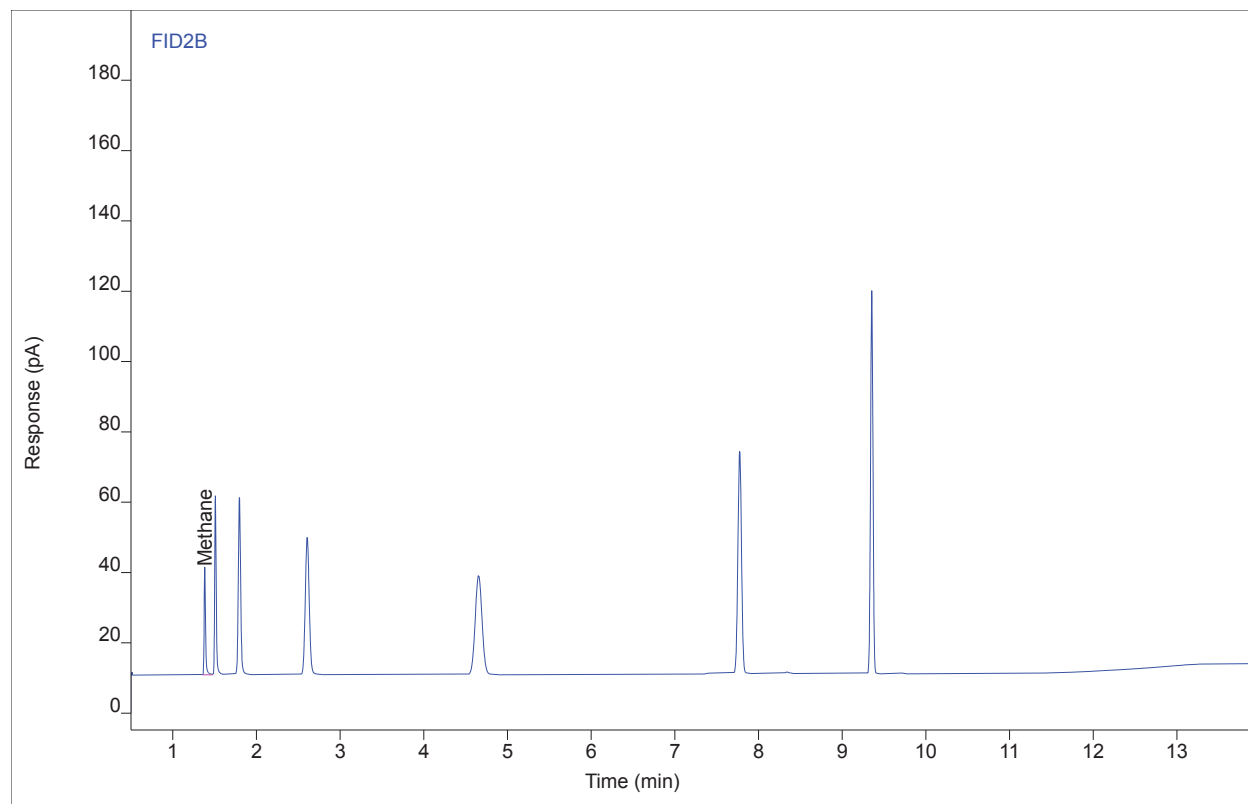
| Compound | Type | RT     | Area | Height | Amount | DF | SampAmt | Unit |
|----------|------|--------|------|--------|--------|----|---------|------|
| Methane  |      | (1.37) |      |        |        | 1  |         |      |

# Chromatogram Report

Sample Name BettyP919 #C4 ENV(1=0,4=400)  
Sequence Name BETTYP974 ver.2  
Inj Data File 025B0302.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/9/2018 4:32 AM  
File Modified 12/11/2018 10:09 AM  
Instrument Betty  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 25  
Injection Volume 250  
Injection 2 of 4  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C6\_XAS.M  
Method Modified 12/5/2018 7:48 AM  
Printed 12/11/2018 3:48 PM



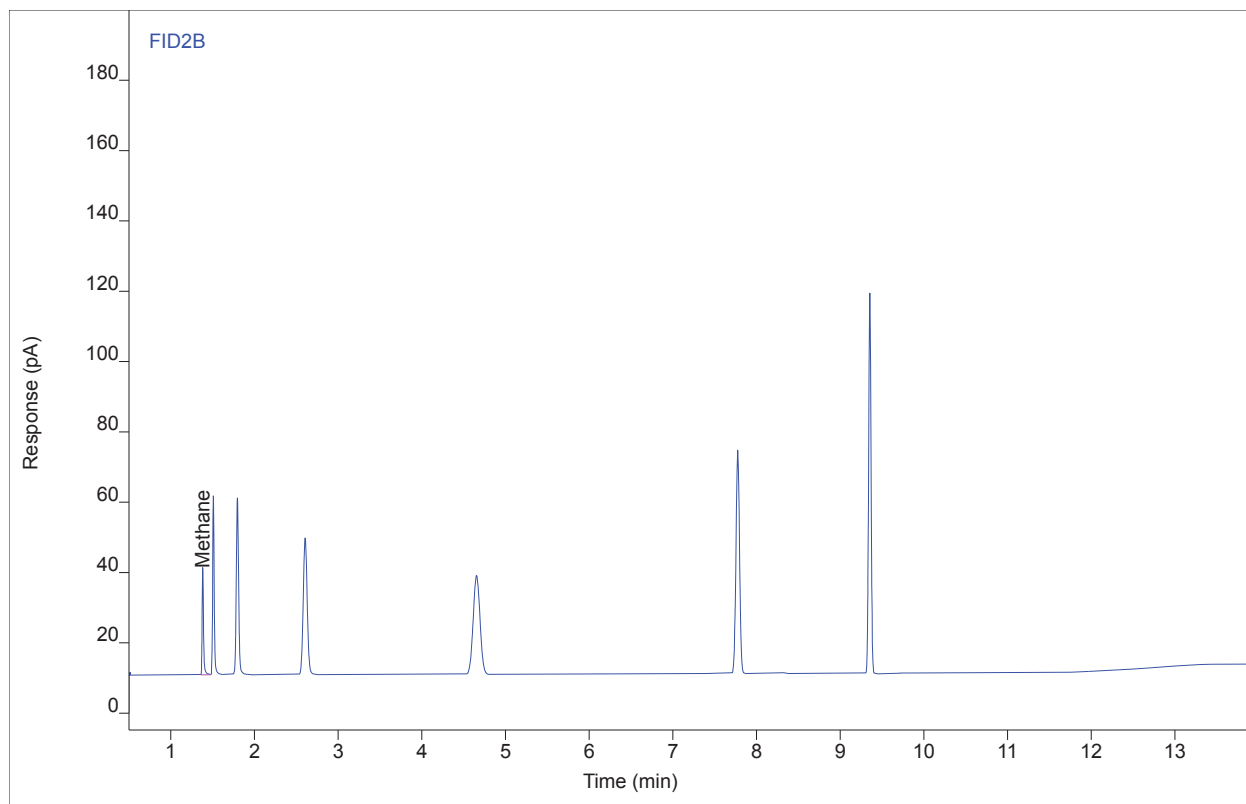
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.38 | 36.2809 | 30.7145 | 102.710 | 1  | 102.710 | ppm  |

# Chromatogram Report

Sample Name BettyP919 #C4 ENV(1=0,4=400)  
Sequence Name BETTYP974 ver.2  
Inj Data File 025B0303.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/9/2018 4:56 AM  
File Modified 12/11/2018 10:09 AM  
Instrument Betty  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 25  
Injection Volume 250  
Injection 3 of 4  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C6\_XAS.M  
Method Modified 12/5/2018 7:48 AM  
Printed 12/11/2018 3:48 PM



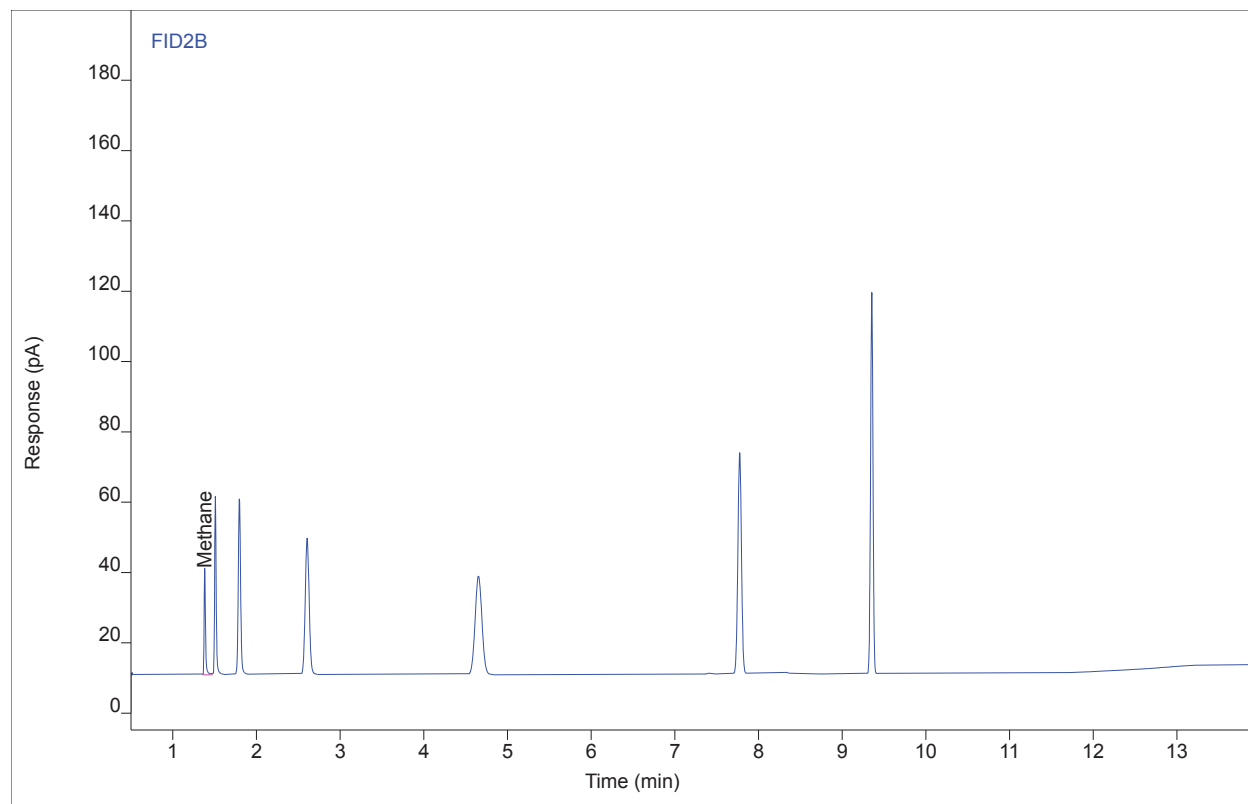
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.38 | 35.8732 | 30.4239 | 101.553 | 1  | 101.553 | ppm  |

# Chromatogram Report

Sample Name BettyP919 #C4 ENV(1=0,4=400)  
Sequence Name BETTYP974 ver.2  
Inj Data File 025B0304.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/9/2018 5:20 AM  
File Modified 12/11/2018 10:09 AM  
Instrument Betty  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 25  
Injection Volume 250  
Injection 4 of 4  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C6\_XAS.M  
Method Modified 12/5/2018 7:48 AM  
Printed 12/11/2018 3:48 PM



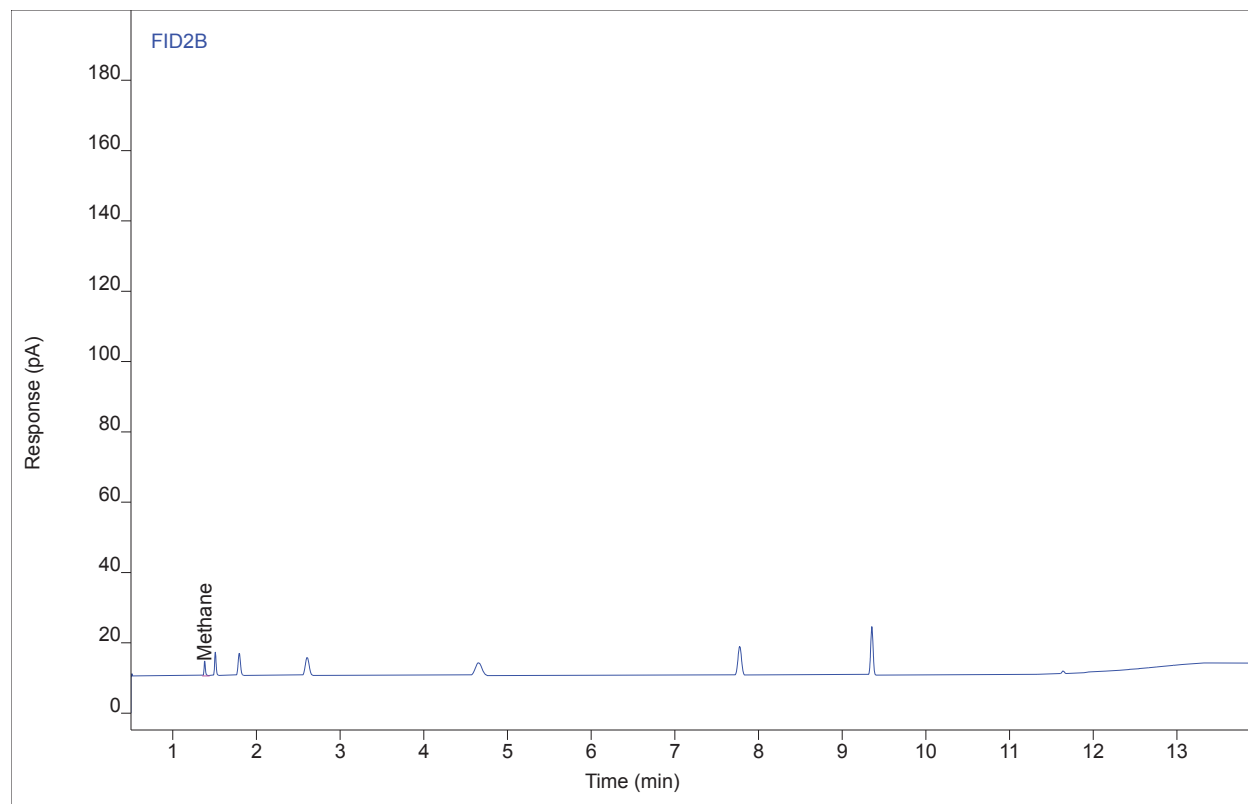
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.38 | 35.6105 | 30.2639 | 100.807 | 1  | 100.807 | ppm  |

# Chromatogram Report

Sample Name 1218-052.S1-M18-1 SP.Bag  
Sequence Name BETTYP974 ver.2  
Inj Data File 022B0601.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/9/2018 2:20 PM  
File Modified 12/11/2018 10:09 AM  
Instrument Betty  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 22  
Injection Volume 250  
Injection 1 of 3  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C6\_XAS.M  
Method Modified 12/5/2018 7:48 AM  
Printed 12/11/2018 3:48 PM



| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.38 | 4.87233 | 4.24517 | 13.5572 | 1  | 13.5572 | ppm  |

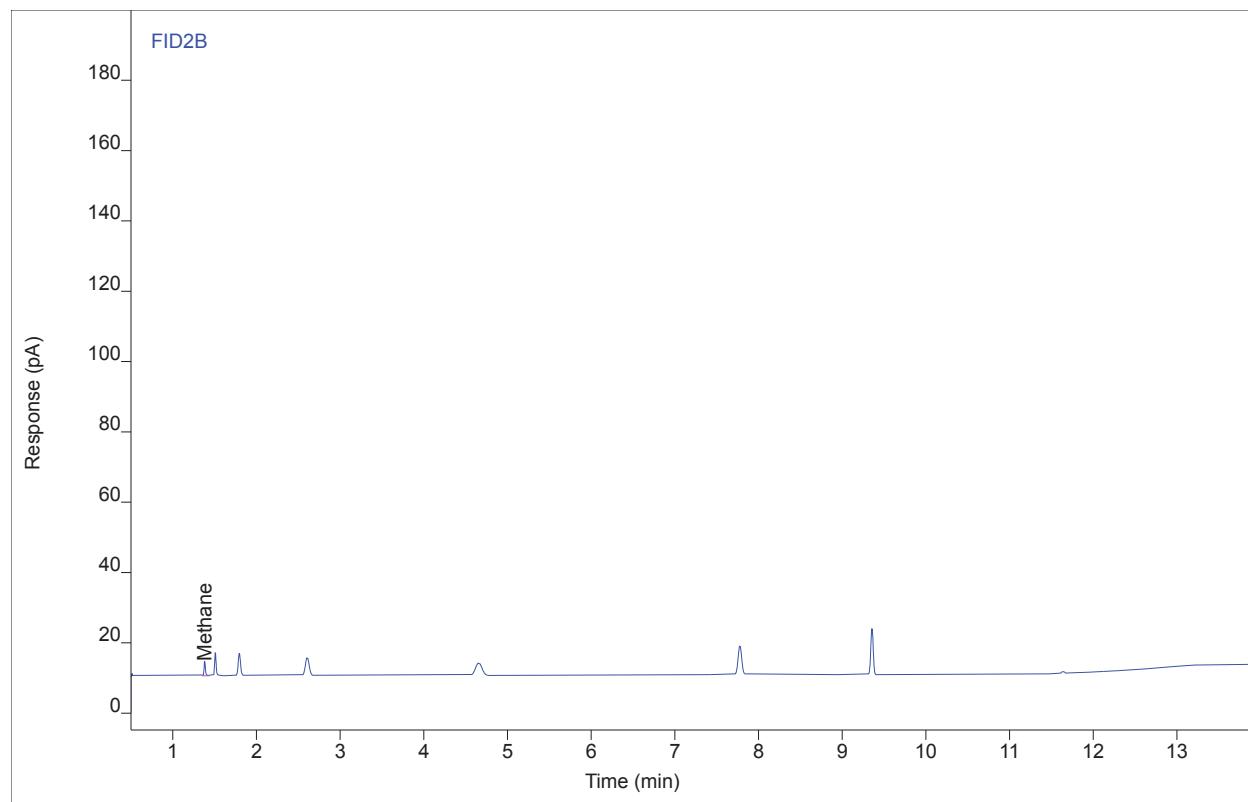


# Chromatogram Report

Sample Name 1218-052.S1-M18-1 SP.Bag  
Sequence Name BETTYP974 ver.2  
Inj Data File 022B0602.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/9/2018 2:41 PM  
File Modified 12/11/2018 10:09 AM  
Instrument Betty  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 22  
Injection Volume 250  
Injection 2 of 3  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C6\_XAS.M  
Method Modified 12/5/2018 7:48 AM  
Printed 12/11/2018 3:48 PM



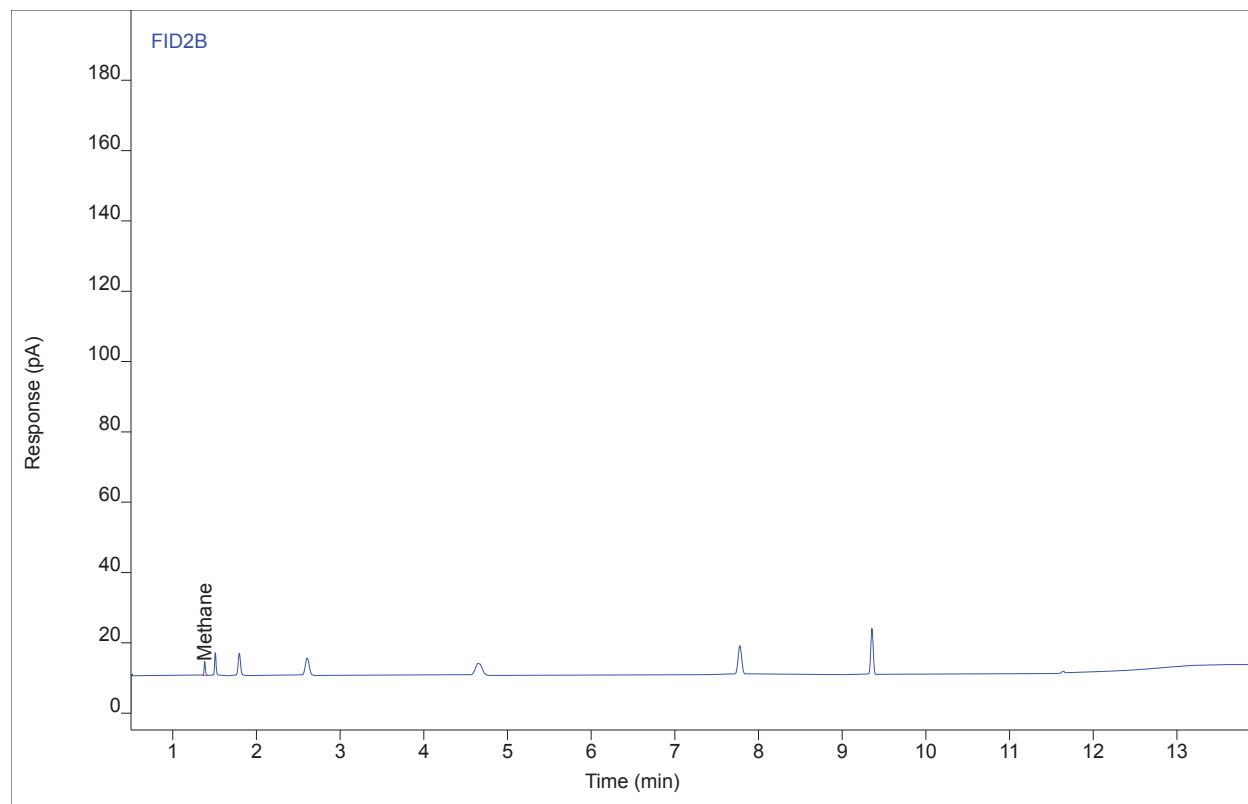
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.38 | 4.78405 | 4.18922 | 13.3066 | 1  | 13.3066 | ppm  |

# Chromatogram Report

Sample Name 1218-052.S1-M18-1 SP.Bag  
Sequence Name BETTYP974 ver.2  
Inj Data File 022B0603.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/9/2018 3:02 PM  
File Modified 12/11/2018 10:09 AM  
Instrument Betty  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 22  
Injection Volume 250  
Injection 3 of 3  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C6\_XAS.M  
Method Modified 12/5/2018 7:48 AM  
Printed 12/11/2018 3:48 PM



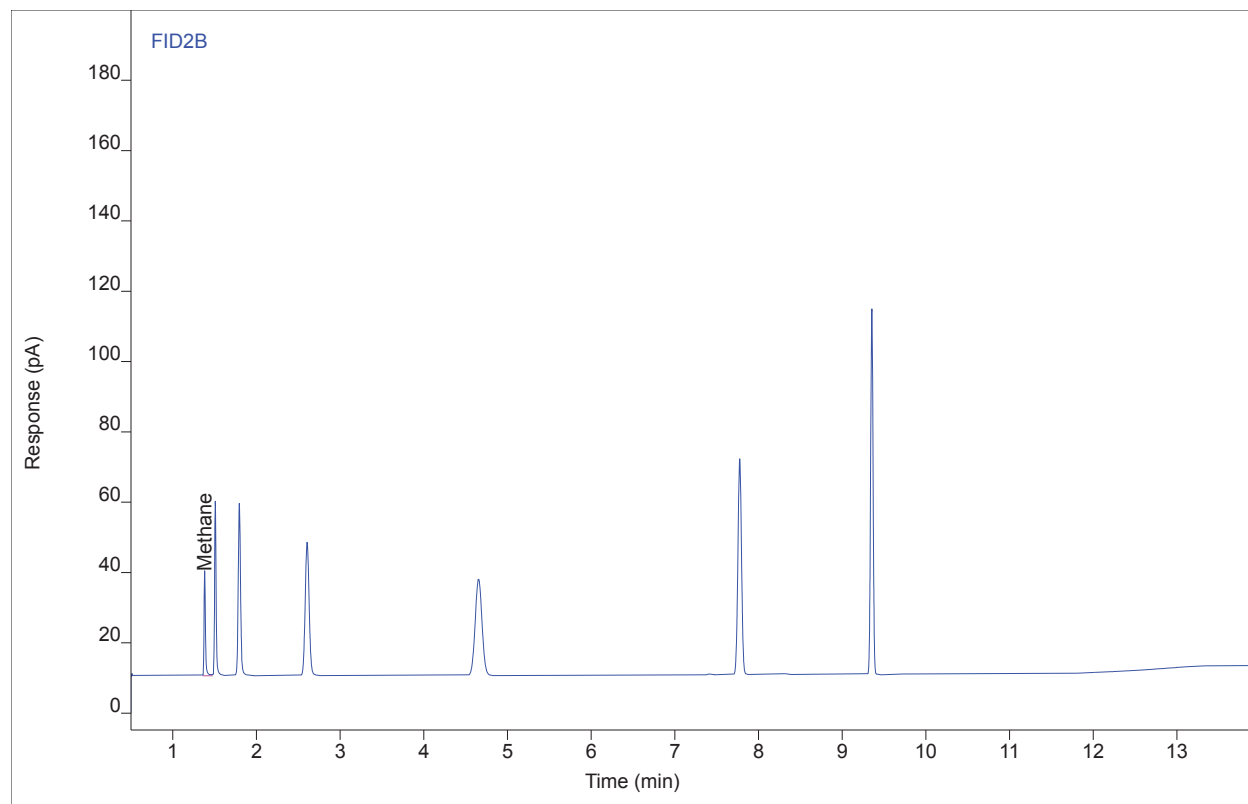
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.38 | 4.72264 | 4.14645 | 13.1323 | 1  | 13.1323 | ppm  |

# Chromatogram Report

Sample Name BettyP919 #C4 ENV(1=0,4=400)  
Sequence Name BETTYP974 ver.2  
Inj Data File 025B0702.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/9/2018 3:50 PM  
File Modified 12/11/2018 10:09 AM  
Instrument Betty  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 25  
Injection Volume 250  
Injection 2 of 4  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C6\_XAS.M  
Method Modified 12/5/2018 7:48 AM  
Printed 12/11/2018 3:48 PM



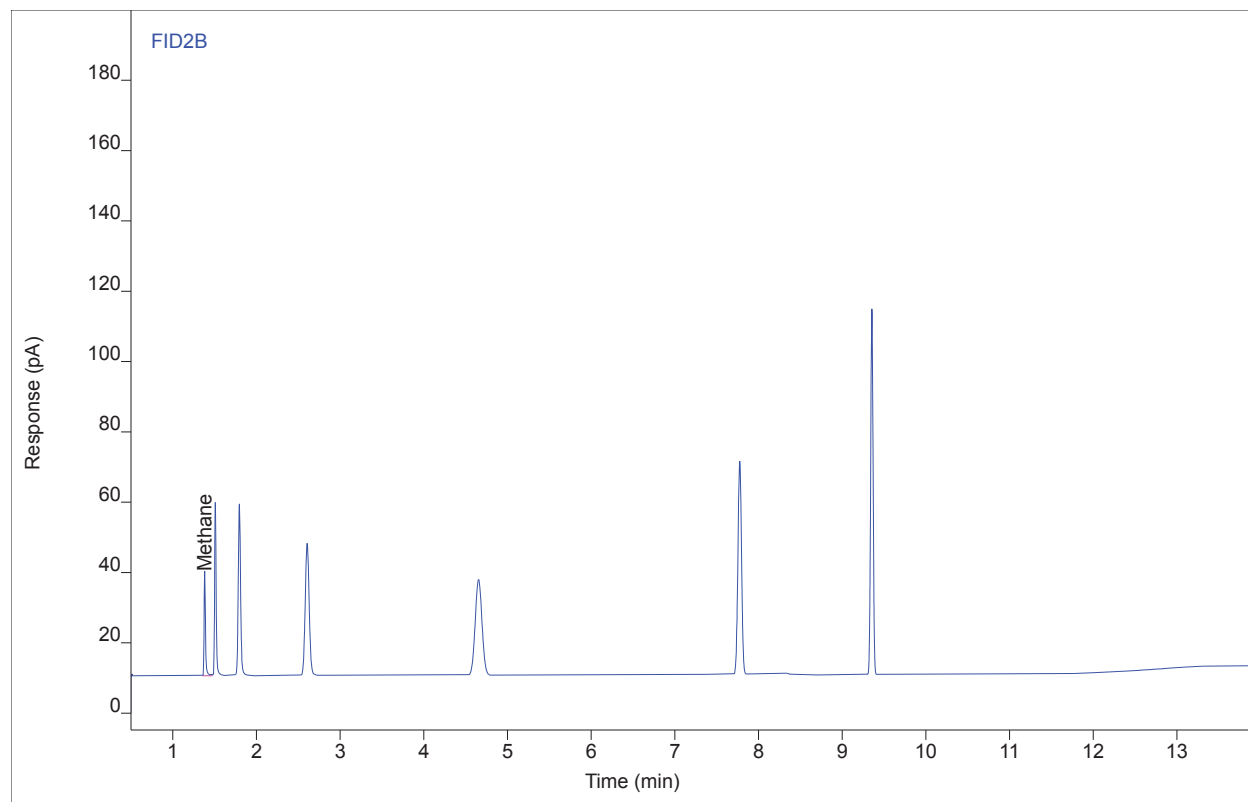
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.38 | 34.9088 | 29.8240 | 98.8152 | 1  | 98.8152 | ppm  |

# Chromatogram Report

Sample Name BettyP919 #C4 ENV(1=0,4=400)  
Sequence Name BETTYP974 ver.2  
Inj Data File 025B0703.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/9/2018 4:14 PM  
File Modified 12/11/2018 10:10 AM  
Instrument Betty  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 25  
Injection Volume 250  
Injection 3 of 4  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C6\_XAS.M  
Method Modified 12/5/2018 7:48 AM  
Printed 12/11/2018 3:48 PM



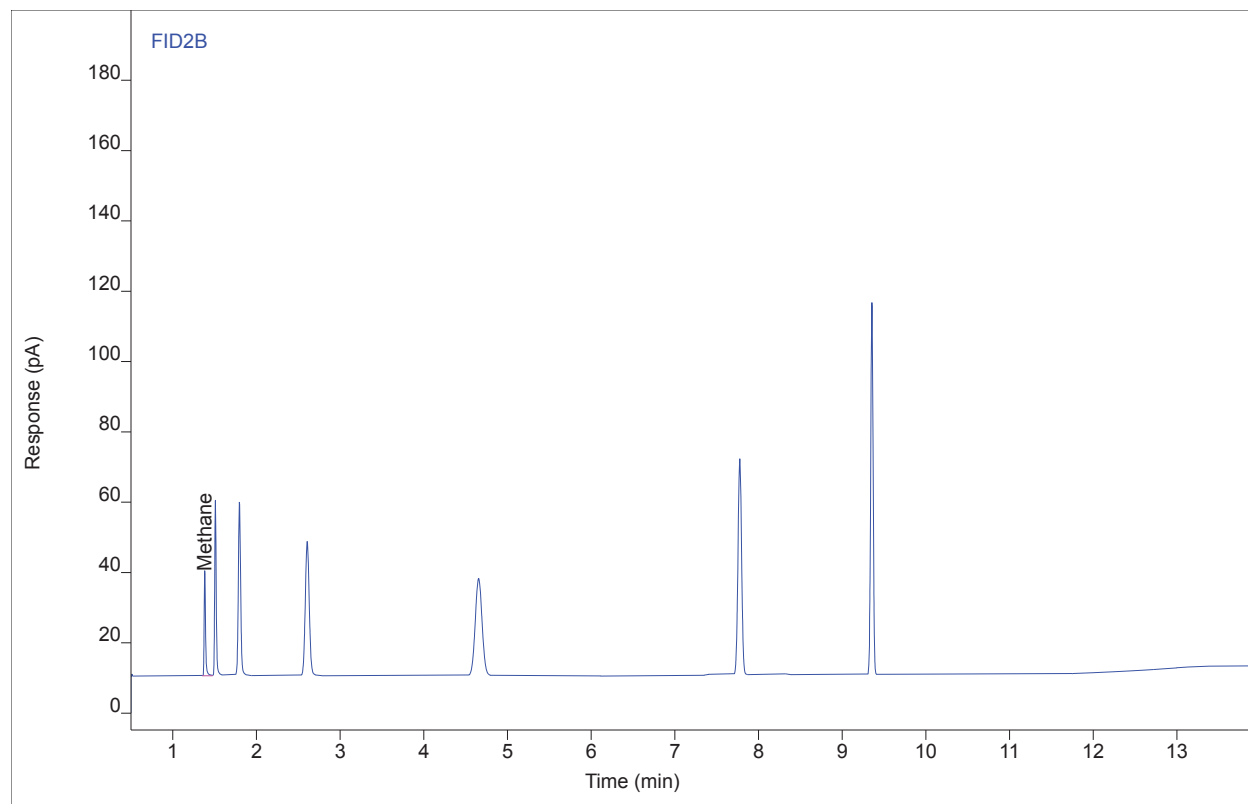
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.38 | 34.6003 | 29.6947 | 97.9396 | 1  | 97.9396 | ppm  |

# Chromatogram Report

Sample Name BettyP919 #C4 ENV(1=0,4=400)  
Sequence Name BETTYP974 ver.2  
Inj Data File 025B0704.D  
File Location GC/2018/Betty/Quarter 4  
Injection Date 12/9/2018 4:39 PM  
File Modified 12/11/2018 10:10 AM  
Instrument Betty  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 25  
Injection Volume 250  
Injection 4 of 4  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C6\_XAS.M  
Method Modified 12/5/2018 7:48 AM  
Printed 12/11/2018 3:48 PM



| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.38 | 35.0022 | 29.8472 | 99.0804 | 1  | 99.0804 | ppm  |

## Enthalpy Analytical

Company: Air Control Techniques PC

Job No.: 1218-052 EPA Method 18 (Bags)

Client No.: 2333

## Methane -- Calibration Standards

| Sample ID                               | Filename<br>#1 | Filename<br>#2 | Filename<br>#3 | Analysis<br>Method         | Ret<br>Time<br>(min) | Ret<br>Time<br>(min) | Ret<br>Time<br>(min) | %dif<br>RT | Conc<br># 1 | Conc<br># 2 | Conc<br># 3 | %dif<br>conc | Avg<br>Conc<br>ppm | Std<br>Tag<br>ppm | %<br>Tag |
|-----------------------------------------|----------------|----------------|----------------|----------------------------|----------------------|----------------------|----------------------|------------|-------------|-------------|-------------|--------------|--------------------|-------------------|----------|
| <b>BettyP919 #C4<br/>ENV(1=0,4=400)</b> | 025B1701.D     | 025B1702.D     | 025B1703.D     | BETTY P773<br>_C1-C6_XAS.M | 1.38                 | 1.38                 | 1.38                 | 0.0        | 102         | 101         | 101         | 0.6          | 101                | 100               | 101      |
| <b>BettyP919 #C4<br/>ENV(1=0,4=400)</b> | 025B1001.D     | 025B1002.D     | 025B1003.D     | BETTY P773<br>_C1-C6_XAS.M | 1.38                 | 1.38                 | 1.38                 | 0.0        | 103         | 101         | 100         | 1.4          | 101                | 100               | 101      |
| <b>BettyP919 #C4<br/>ENV(1=0,4=400)</b> | 025B0701.D     | 025B0702.D     | 025B0703.D     | BETTY P773<br>_C1-C7.M     | 1.38                 | 1.38                 | 1.38                 | 0.0        | 105         | 101         | 102         | 2.2          | 102                | 100               | 102      |
| <b>BettyP374 Method<br/>Blank 1 #MB</b> | 017B0102.D     | 017B0103.D     | 017B0104.D     | BETTY P773<br>_C1-C6_XAS.M | NA                   | NA                   | NA                   | NA         | 0.816       | 0.816       | 0.816       | 0.0          | 0.816              | NA                | NA       |
| <b>BettyP919 #C4<br/>ENV(1=0,4=400)</b> | 025B0302.D     | 025B0303.D     | 025B0304.D     | BETTY P773<br>_C1-C6_XAS.M | 1.38                 | 1.38                 | 1.38                 | 0.0        | 103         | 102         | 101         | 1.0          | 102                | 100               | 102      |
| <b>BettyP919 #C4<br/>ENV(1=0,4=400)</b> | 025B0702.D     | 025B0703.D     | 025B0704.D     | BETTY P773<br>_C1-C6_XAS.M | 1.38                 | 1.38                 | 1.38                 | 0.0        | 98.8        | 97.9        | 99.1        | 0.7          | 98.6               | 100               | 98.6     |

```
=====
                        Calibration Table
=====
```

Calib. Data Modified : 3/20/2018 2:56:30 PM

Rel. Reference Window : 1.000 %  
 Abs. Reference Window : 0.000 min  
 Rel. Non-ref. Window : 1.000 %  
 Abs. Non-ref. Window : 0.000 min  
 Uncalibrated Peaks : using compound Propane  
 Partial Calibration : Yes, identified peaks are recalibrated  
 Correct All Ret. Times: No, only for identified peaks

Curve Type : Linear  
 Origin : Connected  
 Weight : Quadratic (Amnt)

Recalibration Settings:  
 Average Response : Average all calibrations  
 Average Retention Time: Floating Average New 75%

Calibration Report Options :  
 Printout of recalibrations within a sequence:  
     Calibration Table after Recalibration  
     Normal Report after Recalibration  
 If the sequence is done with bracketing:  
     Results of first cycle (ending previous bracket)

Signal 1: FID2 B,

| RetTime<br>[min] | Lvl<br>Sig | Amount<br>[ppm] | Area       | Amt/Area   | Ref Grp Name |
|------------------|------------|-----------------|------------|------------|--------------|
| 1.381            | 1 1        | 5.00000         | 1.85132    | 2.70077    | Methane      |
|                  | 2          | 20.00000        | 7.17869    | 2.78602    |              |
|                  | 3          | 36.00000        | 12.91274   | 2.78794    |              |
|                  | 4          | 100.00000       | 35.92371   | 2.78368    |              |
|                  | 5          | 1799.00000      | 629.92448  | 2.85590    |              |
|                  | 6          | 5561.00000      | 1925.11084 | 2.88866    |              |
|                  | 7          | 4.99200e4       | 1.74910e4  | 2.85404    |              |
| 1.509            | 1 1        | 5.00000         | 3.51143    | 1.42392    | Ethane       |
|                  | 2          | 20.00000        | 13.35849   | 1.49718    |              |
|                  | 3          | 36.00000        | 24.17391   | 1.48921    |              |
|                  | 4          | 100.00000       | 66.80825   | 1.49682    |              |
|                  | 5          | 1800.00000      | 1185.36955 | 1.51851    |              |
|                  | 6          | 5564.00000      | 3628.16577 | 1.53356    |              |
|                  | 7          | 4.99500e4       | 3.27808e4  | 1.52376    |              |
| 1.780            | 1 1        | 5.00000         | 5.44360    | 9.18511e-1 | Propane      |
|                  | 2          | 20.00000        | 20.32719   | 9.83904e-1 |              |
|                  | 3          | 36.00000        | 36.61232   | 9.83276e-1 |              |
|                  | 4          | 100.00000       | 100.07090  | 9.99291e-1 |              |
|                  | 5          | 1800.00000      | 1781.22225 | 1.01054    |              |
|                  | 6          | 5566.00000      | 5436.71436 | 1.02378    |              |
|                  | 7          | 4.99700e4       | 4.92738e4  | 1.01413    |              |
| 2.609            | 1 1        | 5.00000         | 6.78349    | 7.37083e-1 | Butane       |
|                  | 2          | 20.00000        | 26.32429   | 7.59755e-1 |              |
|                  | 3          | 36.00000        | 47.11043   | 7.64162e-1 |              |
|                  | 4          | 100.00000       | 130.48936  | 7.66346e-1 |              |
|                  | 5          | 360.00000       | 474.45438  | 7.58766e-1 |              |
|                  | 6          | 1113.00000      | 1449.71183 | 7.67739e-1 |              |
|                  | 7          | 9991.00000      | 1.30827e4  | 7.63680e-1 |              |

154

| RetTime<br>[min] | Lvl<br>Sig | Amount<br>[ppm] | Area       | Amt/Area   | Ref Grp Name |
|------------------|------------|-----------------|------------|------------|--------------|
| 4.663            | 1 1        | 5.00000         | 8.53360    | 5.85919e-1 | Pentane      |
|                  | 2          | 20.00000        | 33.10566   | 6.04126e-1 |              |
|                  | 3          | 36.00000        | 59.18170   | 6.08296e-1 |              |
|                  | 4          | 100.00000       | 163.94296  | 6.09968e-1 |              |
|                  | 5          | 180.00000       | 295.46891  | 6.09201e-1 |              |
|                  | 6          | 556.00000       | 903.34064  | 6.15493e-1 |              |
|                  | 7          | 4995.00000      | 8149.24805 | 6.12940e-1 |              |
| 7.782            | 1 1        | 5.00000         | 10.22645   | 4.88928e-1 | Hexane       |
|                  | 2          | 20.00000        | 39.45738   | 5.06876e-1 |              |
|                  | 3          | 36.00000        | 70.37578   | 5.11540e-1 |              |
|                  | 4          | 100.00000       | 194.70184  | 5.13606e-1 |              |
|                  | 5          | 144.00000       | 282.76460  | 5.09258e-1 |              |
|                  | 6          | 446.00000       | 864.74677  | 5.15758e-1 |              |
|                  | 7          | 4001.00000      | 7793.09538 | 5.13403e-1 |              |

More compound-specific settings:

Compound: Methane

Time Window : From 1.360 min To 1.400 min

Compound: Ethane

Time Window : From 1.471 min To 1.531 min

Compound: Propane

Time Window : From 1.722 min To 1.832 min

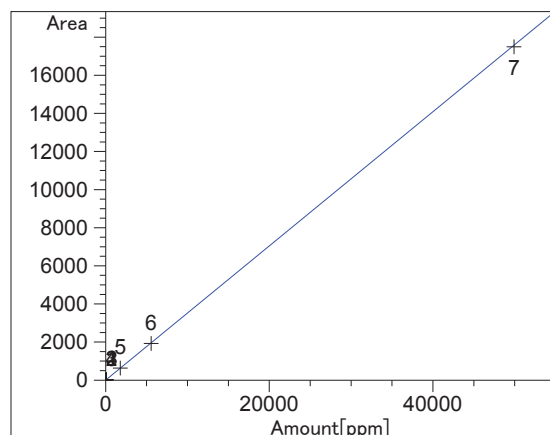
Compound: Butane

Time Window : From 2.563 min To 2.623 min

#### Peak Sum Table

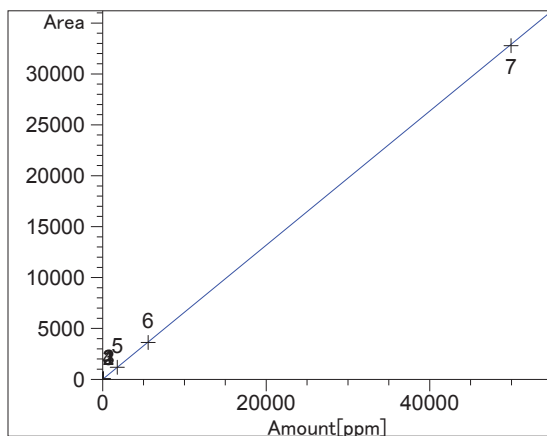
| Name       | StartTime<br>[min] | EndTime<br>[min] | Use<br>Reference | Response<br>factor | Multiplier | ISTD<br>Peak |
|------------|--------------------|------------------|------------------|--------------------|------------|--------------|
| as Ethane  | 1.440              | 1.657            | None             | 1.4977             | 1.4977     | None         |
| as Propane | 1.657              | 2.211            | None             | 9.9057e-1          | 0.9906     | None         |
| as Butane  | 2.211              | 3.652            | None             | 7.5965e-1          | 0.7596     | None         |
| as Pentane | 3.652              | 6.240            | None             | 6.0656e-1          | 0.6066     | None         |
| as Hexane  | 6.240              | 14.000           | None             | 5.0848e-1          | 0.5085     | None         |

#### Calibration Curves

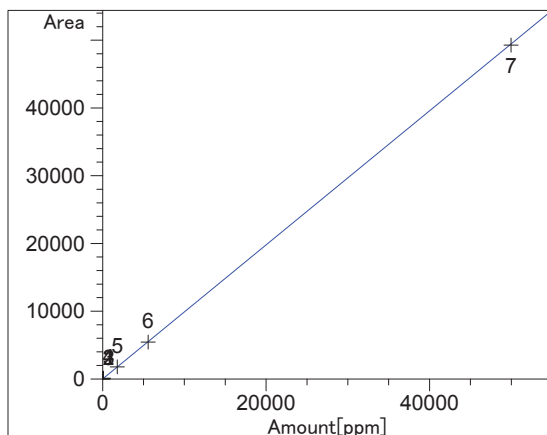


Methane at exp. RT: 1.381  
FID2 B,  
Correlation: 0.99992  
Residual Std. Dev.: 45.57516  
Formula:  $y = mx + b$   
m: 3.52300e-1  
b: 9.61218e-2  
x: Amount  
y: Area  
Calibration Level Weights:  
Level 1 : 1  
Level 2 : 0.0625  
Level 3 : 0.01929  
Level 4 : 0.0025  
Level 5 : 7.72463e-006  
Level 6 : 8.08415e-007  
Level 7 : 1.00321e-008

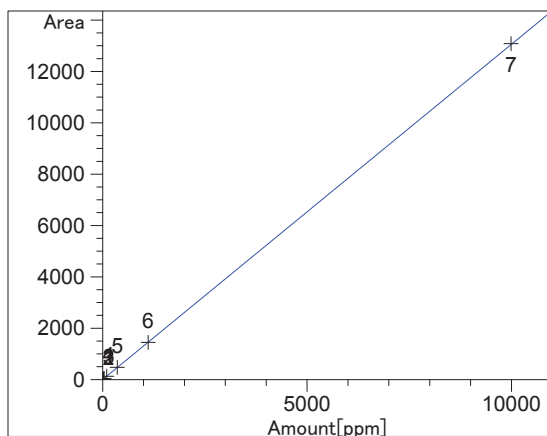




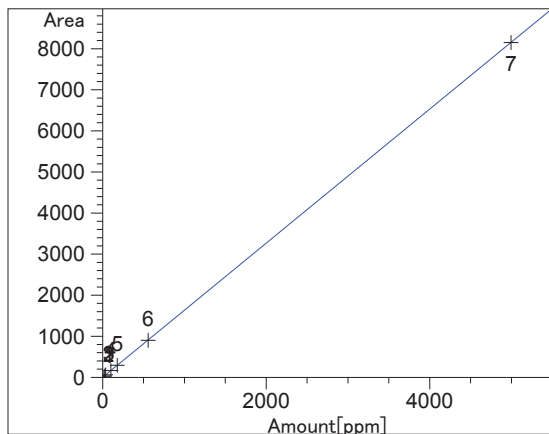
Ethane at exp. RT: 1.509  
 FID2 B,  
 Correlation: 0.99997  
 Residual Std. Dev.: 64.40241  
 Formula:  $y = mx + b$   
     m: 6.59042e-1  
     b: 2.19675e-1  
     x: Amount  
     y: Area  
 Calibration Level Weights:  
     Level 1 : 1  
     Level 2 : 0.0625  
     Level 3 : 0.01929  
     Level 4 : 0.0025  
     Level 5 : 7.71605e-006  
     Level 6 : 8.07543e-007  
     Level 7 : 1.002e-008



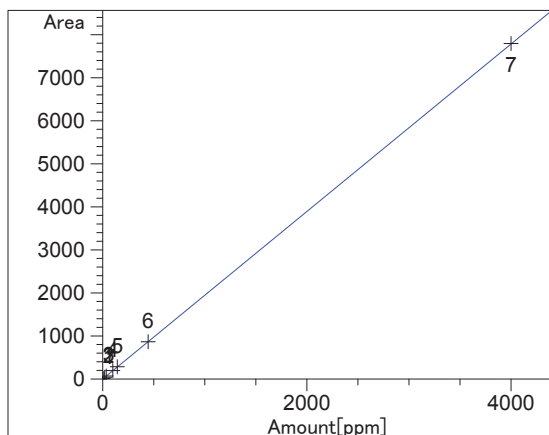
Propane at exp. RT: 1.780  
 FID2 B,  
 Correlation: 0.99996  
 Residual Std. Dev.: 91.59980  
 Formula:  $y = mx + b$   
     m: 9.89883e-1  
     b: 5.06094e-1  
     x: Amount  
     y: Area  
 Calibration Level Weights:  
     Level 1 : 1  
     Level 2 : 0.0625  
     Level 3 : 0.01929  
     Level 4 : 0.0025  
     Level 5 : 7.71605e-006  
     Level 6 : 8.06963e-007  
     Level 7 : 1.0012e-008



Butane at exp. RT: 2.609  
 FID2 B,  
 Correlation: 0.99999  
 Residual Std. Dev.: 13.67916  
 Formula:  $y = mx + b$   
     m: 1.30642  
     b: 2.44793e-1  
     x: Amount  
     y: Area  
 Calibration Level Weights:  
     Level 1 : 1  
     Level 2 : 0.0625  
     Level 3 : 0.01929  
     Level 4 : 0.0025  
     Level 5 : 0.000193  
     Level 6 : 0.00002  
     Level 7 : 2.50451e-007



Pentane at exp. RT: 4.663  
 FID2 B,  
 Correlation: 0.99999  
 Residual Std. Dev.: 4.81681  
 Formula:  $y = mx + b$   
     m: 1.63329  
     b: 3.72609e-1  
     x: Amount  
     y: Area  
 Calibration Level Weights:  
     Level 1 : 1  
     Level 2 : 0.0625  
     Level 3 : 0.01929  
     Level 4 : 0.0025  
     Level 5 : 0.000772  
     Level 6 : 0.000081  
     Level 7 : 1.002e-006



Hexane at exp. RT: 7.782  
 FID2 B,  
 Correlation: 0.99999  
 Residual Std. Dev.: 3.30193  
 Formula:  $y = mx + b$   
     m: 1.94616  
     b: 4.95532e-1  
     x: Amount  
     y: Area  
 Calibration Level Weights:  
     Level 1 : 1  
     Level 2 : 0.0625  
     Level 3 : 0.01929  
     Level 4 : 0.0025  
     Level 5 : 0.001206  
     Level 6 : 0.000126  
     Level 7 : 1.56172e-006

=====

=====

Calibration Table

=====

-----

General Calibration Setting

-----

Calib. Data Modified : 2/22/2018 9:12:06 AM  
 Signals calculated separately : No

Rel. Reference Window : 1.000 %  
 Abs. Reference Window : 0.000 min  
 Rel. Non-ref. Window : 1.000 %  
 Abs. Non-ref. Window : 0.000 min  
 Uncalibrated Peaks : using compound Propane  
 Partial Calibration : Yes, identified peaks are recalibrated  
 Correct All Ret. Times: No, only for identified peaks

Curve Type : Linear  
 Origin : Connected  
 Weight : Quadratic (Amnt)

Recalibration Settings:  
 Average Response : Average all calibrations  
 Average Retention Time: Floating Average New 75%

Calibration Report Options :  
 Printout of recalibrations within a sequence:  
   Calibration Table after Recalibration  
   Normal Report after Recalibration  
 If the sequence is done with bracketing:  
   Results of first cycle (ending previous bracket)

-----

Signal Details

-----

Signal 1: FID2 B,

-----

Overview Table

-----

| RT    | Sig | Lvl | Amount<br>[ppm] | Area       | Rsp.Factor | Ref | ISTD # | Compound |
|-------|-----|-----|-----------------|------------|------------|-----|--------|----------|
| 1.381 | 1   | 1   | 5.00000         | 1.85132    | 2.70077    | No  | No     | Methane  |
|       |     | 2   | 20.00000        | 7.17869    | 2.78602    |     |        |          |
|       |     | 3   | 36.00000        | 12.91274   | 2.78794    |     |        |          |
|       |     | 4   | 100.00000       | 35.92371   | 2.78368    |     |        |          |
|       |     | 5   | 1799.00000      | 629.92448  | 2.85590    |     |        |          |
|       |     | 6   | 5561.00000      | 1925.11084 | 2.88866    |     |        |          |
|       |     | 7   | 4.99200e4       | 1.74910e4  | 2.85404    |     |        |          |
| 1.509 | 1   | 1   | 5.00000         | 3.51143    | 1.42392    | No  | No     | Ethane   |
|       |     | 2   | 20.00000        | 13.35849   | 1.49718    |     |        |          |
|       |     | 3   | 36.00000        | 24.17391   | 1.48921    |     |        |          |

158

| RT    | Sig | Lvl | Amount<br>[ppm] | Area       | Rsp.Factor | Ref | ISTD # | Compound |
|-------|-----|-----|-----------------|------------|------------|-----|--------|----------|
| ----- |     | -   | ----            | -----      | -----      | --- | ---    | -----    |
|       |     |     | 4 100.00000     | 66.80825   | 1.49682    |     |        |          |
|       |     |     | 5 1800.00000    | 1185.36955 | 1.51851    |     |        |          |
|       |     |     | 6 5564.00000    | 3628.16577 | 1.53356    |     |        |          |
|       |     |     | 7 4.99500e4     | 3.27808e4  | 1.52376    |     |        |          |
| 1.797 | 1   |     | 1 5.00000       | 5.44360    | 9.18511e-1 | No  | No     | Propane  |
|       |     |     | 2 20.00000      | 20.32719   | 9.83904e-1 |     |        |          |
|       |     |     | 3 36.00000      | 36.61232   | 9.83276e-1 |     |        |          |
|       |     |     | 4 100.00000     | 100.07090  | 9.99291e-1 |     |        |          |
|       |     |     | 5 1800.00000    | 1781.22225 | 1.01054    |     |        |          |
|       |     |     | 6 5566.00000    | 5436.71436 | 1.02378    |     |        |          |
|       |     |     | 7 4.99700e4     | 4.92738e4  | 1.01413    |     |        |          |
| 2.609 | 1   |     | 1 5.00000       | 6.78349    | 7.37083e-1 | No  | No     | Butane   |
|       |     |     | 2 20.00000      | 26.32429   | 7.59755e-1 |     |        |          |
|       |     |     | 3 36.00000      | 47.11043   | 7.64162e-1 |     |        |          |
|       |     |     | 4 100.00000     | 130.48936  | 7.66346e-1 |     |        |          |
|       |     |     | 5 360.00000     | 474.45438  | 7.58766e-1 |     |        |          |
|       |     |     | 6 1113.00000    | 1449.71183 | 7.67739e-1 |     |        |          |
|       |     |     | 7 9991.00000    | 1.30827e4  | 7.63680e-1 |     |        |          |
| 4.663 | 1   |     | 1 5.00000       | 8.53360    | 5.85919e-1 | No  | No     | Pentane  |
|       |     |     | 2 20.00000      | 33.10566   | 6.04126e-1 |     |        |          |
|       |     |     | 3 36.00000      | 59.18170   | 6.08296e-1 |     |        |          |
|       |     |     | 4 100.00000     | 163.94296  | 6.09968e-1 |     |        |          |
|       |     |     | 5 180.00000     | 295.46891  | 6.09201e-1 |     |        |          |
|       |     |     | 6 556.00000     | 903.34064  | 6.15493e-1 |     |        |          |
|       |     |     | 7 4995.00000    | 8149.24805 | 6.12940e-1 |     |        |          |
| 7.782 | 1   |     | 1 5.00000       | 10.22645   | 4.88928e-1 | No  | No     | Hexane   |
|       |     |     | 2 20.00000      | 39.45738   | 5.06876e-1 |     |        |          |
|       |     |     | 3 36.00000      | 70.37578   | 5.11540e-1 |     |        |          |
|       |     |     | 4 100.00000     | 194.70184  | 5.13606e-1 |     |        |          |
|       |     |     | 5 144.00000     | 282.76460  | 5.09258e-1 |     |        |          |
|       |     |     | 6 446.00000     | 864.74677  | 5.15758e-1 |     |        |          |
|       |     |     | 7 4001.00000    | 7793.09538 | 5.13403e-1 |     |        |          |
| 9.359 | 1   |     | 1 5.00000       | 11.63456   | 4.29754e-1 | No  | No     | Heptane  |
|       |     |     | 2 20.00000      | 45.85759   | 4.36133e-1 |     |        |          |
|       |     |     | 3 36.00000      | 81.79598   | 4.40119e-1 |     |        |          |
|       |     |     | 4 100.00000     | 227.52871  | 4.39505e-1 |     |        |          |
|       |     |     | 7 251.20000     | 576.11442  | 4.36024e-1 |     |        |          |

More compound-specific settings

Compound: Methane

Time Window : From 1.360 min To 1.400 min

Compound: Ethane

Time Window : From 1.471 min To 1.531 min

Compound: Propane

Time Window : From 1.739 min To 1.849 min

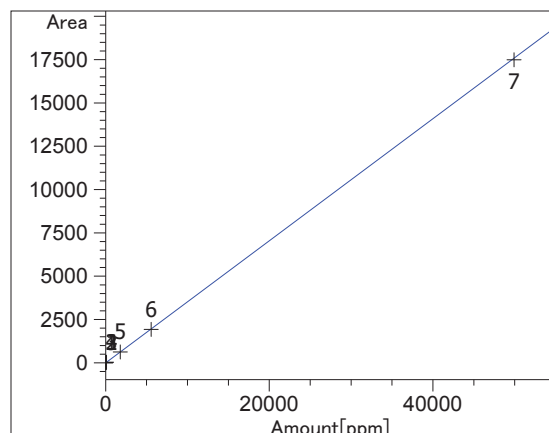
Compound: Butane

Time Window : From 2.563 min To 2.623 min

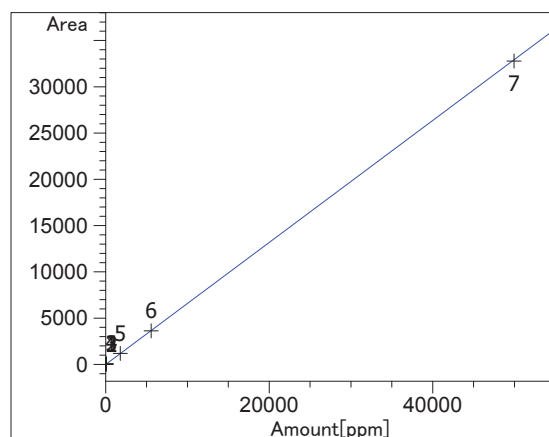
Peak Sum Table

| Name       | StartTime<br>[min] | EndTime<br>[min] | Use<br>Reference | Response<br>factor | Multiplier | ISTD<br>Peak |
|------------|--------------------|------------------|------------------|--------------------|------------|--------------|
| as Ethane  | 1.440              | 1.657            | None             | 1.4977             | 1.4977     | None         |
| as Propane | 1.657              | 2.211            | None             | 9.9057e-1          | 0.9906     | None         |
| as Butane  | 2.211              | 3.652            | None             | 7.5965e-1          | 0.7596     | None         |
| as Pentane | 3.652              | 6.240            | None             | 6.0656e-1          | 0.6066     | None         |
| as Hexane  | 6.240              | 8.578            | None             | 5.0848e-1          | 0.5085     | None         |
| as Heptane | 8.578              | 14.000           | None             | 4.3630e-1          | 0.4363     | None         |

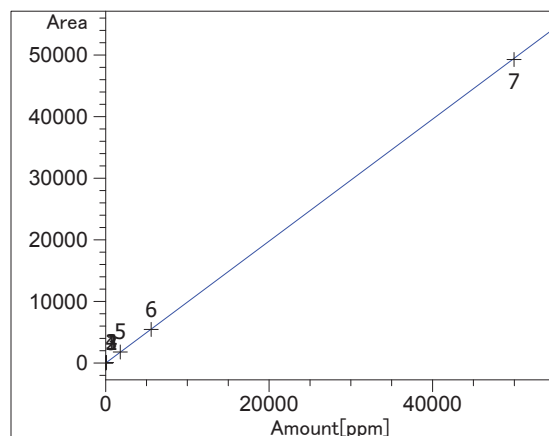
### Calibration Curves



Methane at exp. RT: 1.381  
FID2 B,  
Correlation: 0.99992  
Residual Std. Dev.: 45.57516  
Formula:  $y = mx + b$   
m: 3.52300e-1  
b: 9.61218e-2  
x: Amount[ppm]  
y: Area  
Calibration Level Weights:  
Level 1 : 1  
Level 2 : 0.0625  
Level 3 : 0.01929  
Level 4 : 0.0025  
Level 5 : 7.72463e-006  
Level 6 : 8.08415e-007  
Level 7 : 1.00321e-008

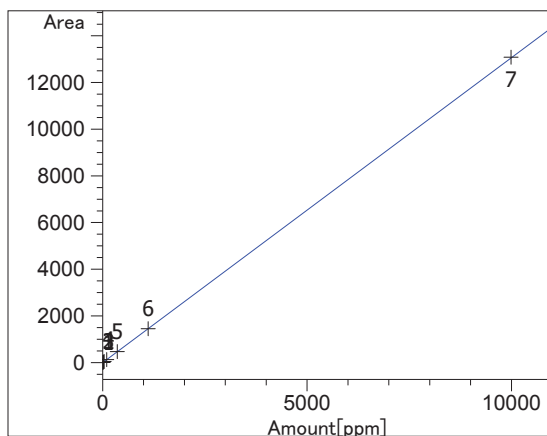


Ethane at exp. RT: 1.509  
FID2 B,  
Correlation: 0.99997  
Residual Std. Dev.: 64.40241  
Formula:  $y = mx + b$   
m: 6.59042e-1  
b: 2.19675e-1  
x: Amount[ppm]  
y: Area  
Calibration Level Weights:  
Level 1 : 1  
Level 2 : 0.0625  
Level 3 : 0.01929  
Level 4 : 0.0025  
Level 5 : 7.71605e-006  
Level 6 : 8.07543e-007  
Level 7 : 1.002e-008

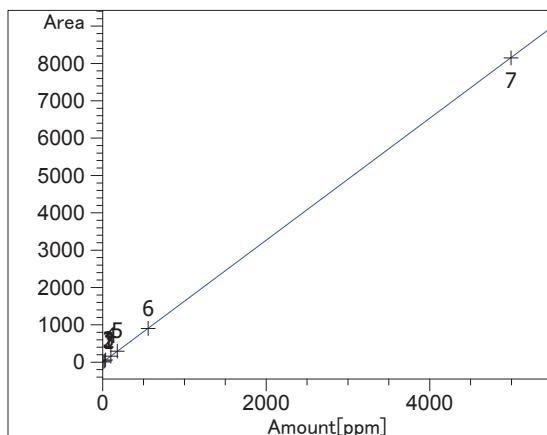


Propane at exp. RT: 1.797  
FID2 B,  
Correlation: 0.99996  
Residual Std. Dev.: 91.59980  
Formula:  $y = mx + b$   
m: 9.89883e-1  
b: 5.06094e-1  
x: Amount[ppm]  
y: Area  
Calibration Level Weights:  
Level 1 : 1  
Level 2 : 0.0625  
Level 3 : 0.01929  
Level 4 : 0.0025

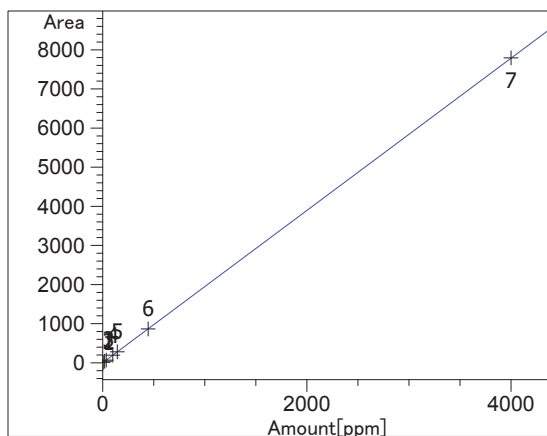
|         |   |              |
|---------|---|--------------|
| Level 5 | : | 7.71605e-006 |
| Level 6 | : | 8.06963e-007 |
| Level 7 | : | 1.0012e-008  |



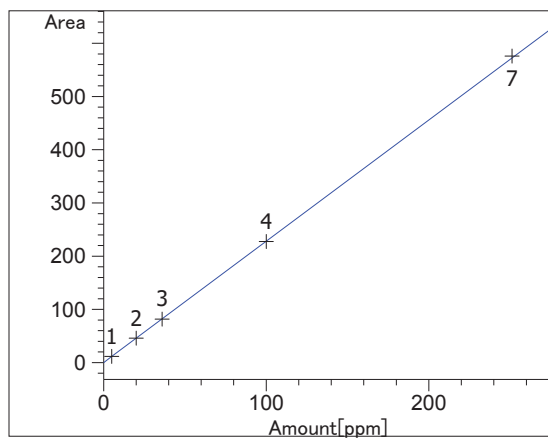
Butane at exp. RT: 2.609  
FID2 B,  
Correlation: 0.99999  
Residual Std. Dev.: 13.67916  
Formula:  $y = mx + b$   
m: 1.30642  
b: 2.44793e-1  
x: Amount[ppm]  
y: Area  
Calibration Level Weights:  
Level 1 : 1  
Level 2 : 0.0625  
Level 3 : 0.01929  
Level 4 : 0.0025  
Level 5 : 0.000193  
Level 6 : 0.00002  
Level 7 : 2.50451e-007



Pentane at exp. RT: 4.663  
FID2 B,  
Correlation: 0.99999  
Residual Std. Dev.: 4.81681  
Formula:  $y = mx + b$   
m: 1.63329  
b: 3.72609e-1  
x: Amount[ppm]  
y: Area  
Calibration Level Weights:  
Level 1 : 1  
Level 2 : 0.0625  
Level 3 : 0.01929  
Level 4 : 0.0025  
Level 5 : 0.000772  
Level 6 : 0.000081  
Level 7 : 1.002e-006



Hexane at exp. RT: 7.782  
FID2 B,  
Correlation: 0.99999  
Residual Std. Dev.: 3.30193  
Formula:  $y = mx + b$   
m: 1.94616  
b: 4.95532e-1  
x: Amount[ppm]  
y: Area  
Calibration Level Weights:  
Level 1 : 1  
Level 2 : 0.0625  
Level 3 : 0.01929  
Level 4 : 0.0025  
Level 5 : 0.001206  
Level 6 : 0.000126  
Level 7 : 1.56172e-006



Heptane at exp. RT: 9.359  
FID2 B,  
Correlation: 0.99999  
Residual Std. Dev.: 2.10837  
Formula:  $y = mx + b$   
m: 2.27824  
b: 2.38039e-1  
x: Amount[ppm]  
y: Area  
Calibration Level Weights:  
Level 1 : 1  
Level 2 : 0.0625  
Level 3 : 0.01929  
Level 4 : 0.0025  
Level 7 : 0.000396

=====

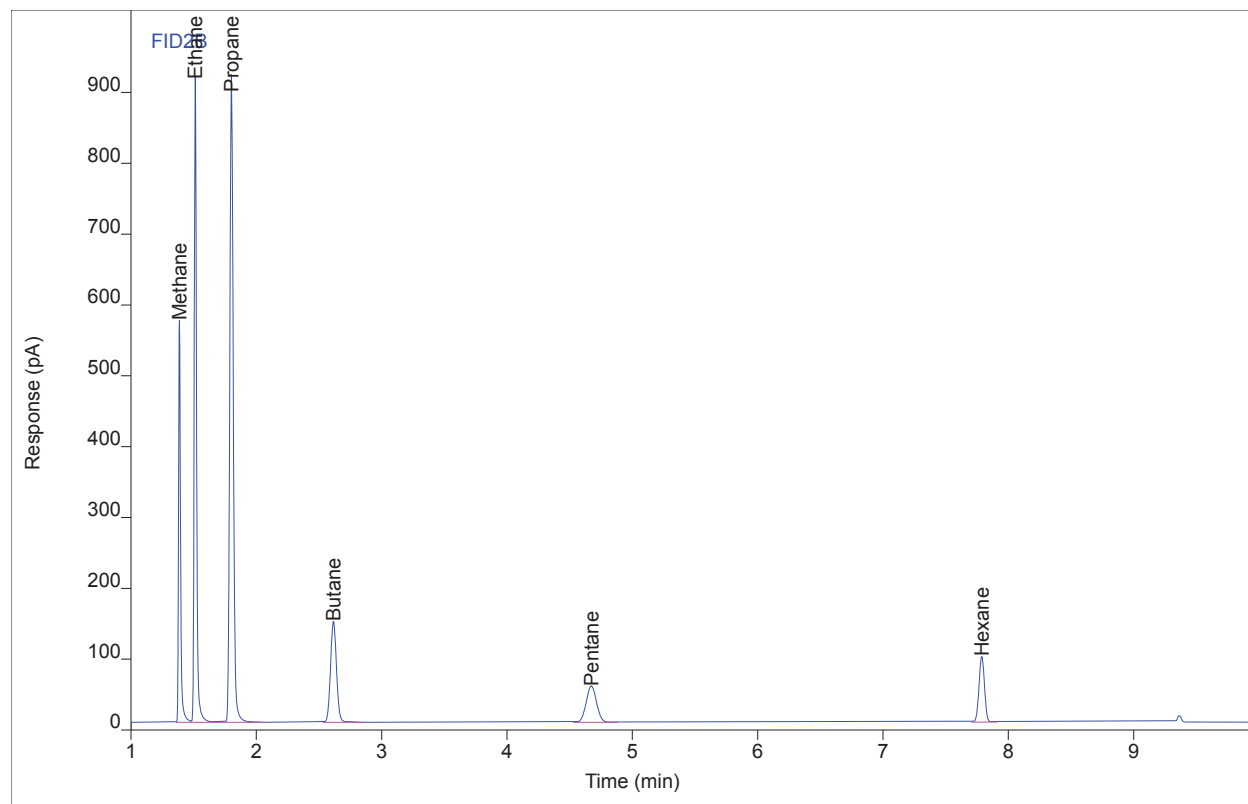


# Chromatogram Report

Sample Name BettyP773 #C5 ENV(1=3800,3=243.32)  
 Sequence Name BETTYP773 ver.7  
 Inj Data File 025B1002.D  
 File Location GC/2018/Betty/Quarter 1  
 Injection Date 2/16/2018 1:49 PM  
 File Modified 2/22/2018 9:19 AM  
 Instrument Betty  
 Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
 Vial Number 25  
 Injection Volume 250  
 Injection 2 of 4  
 Acquisition Method GC142P133\_CAL.M  
 Analysis Method BETTYP773\_C1-C7.M  
 Method Modified 1/2/2014 5:30 PM  
 Printed 2/22/2018 9:36 AM



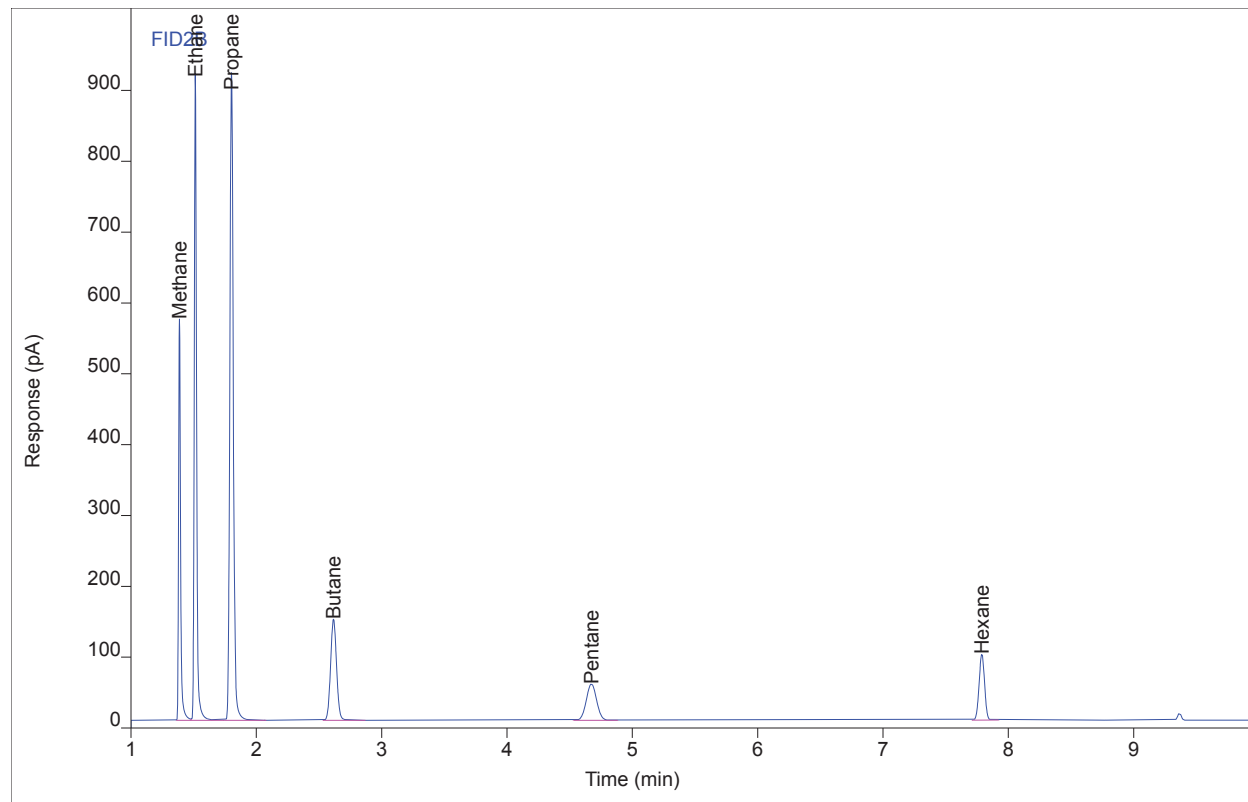
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.39 | 629.953 | 565.341 | 1787.84 | 1  | 1787.84 | ppm  |
| Ethane   | VV   | 1.51 | 1185.28 | 910.378 | 1798.15 | 1  | 1798.15 | ppm  |
| Propane  | VB   | 1.80 | 1780.92 | 913.393 | 1798.61 | 1  | 1798.61 | ppm  |
| Butane   | BB   | 2.62 | 474.513 | 142.555 | 363.028 | 1  | 363.028 | ppm  |
| Pentane  | BB   | 4.67 | 295.371 | 51.5300 | 180.616 | 1  | 180.616 | ppm  |
| Hexane   | BB   | 7.79 | 282.589 | 93.0462 | 144.949 | 1  | 144.949 | ppm  |

# Chromatogram Report

Sample Name BettyP773 #C5 ENV(1=3800,3=243.32)  
 Sequence Name BETTYP773 ver.7  
 Inj Data File 025B1003.D  
 File Location GC/2018/Betty/Quarter 1  
 Injection Date 2/16/2018 2:12 PM  
 File Modified 2/22/2018 9:19 AM  
 Instrument Betty  
 Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
 Vial Number 25  
 Injection Volume 250  
 Injection 3 of 4  
 Acquisition Method GC142P133\_CAL.M  
 Analysis Method BETTYP773\_C1-C7.M  
 Method Modified 1/2/2014 5:30 PM  
 Printed 2/22/2018 9:36 AM



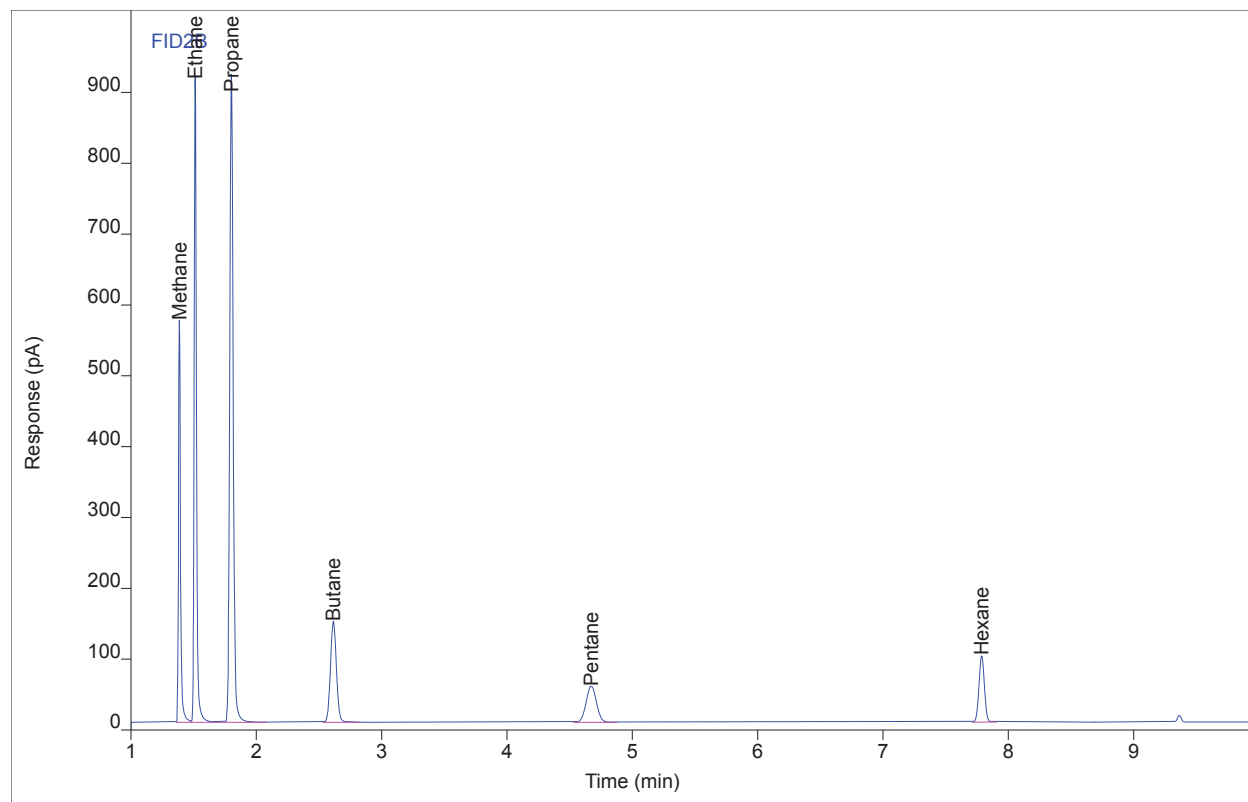
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.39 | 630.097 | 566.306 | 1788.25 | 1  | 1788.25 | ppm  |
| Ethane   | VV   | 1.51 | 1185.76 | 911.997 | 1798.88 | 1  | 1798.88 | ppm  |
| Propane  | VB   | 1.80 | 1781.99 | 913.783 | 1799.69 | 1  | 1799.69 | ppm  |
| Butane   | BB   | 2.62 | 474.866 | 142.900 | 363.298 | 1  | 363.298 | ppm  |
| Pentane  | BB   | 4.67 | 295.593 | 51.4285 | 180.752 | 1  | 180.752 | ppm  |
| Hexane   | BB   | 7.79 | 282.999 | 93.2478 | 145.159 | 1  | 145.159 | ppm  |

# Chromatogram Report

Sample Name BettyP773 #C5 ENV(1=3800,3=243.32)  
Sequence Name BETTYP773 ver.7  
Inj Data File 025B1004.D  
File Location GC/2018/Betty/Quarter 1  
Injection Date 2/16/2018 2:35 PM  
File Modified 2/22/2018 9:19 AM  
Instrument Betty  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
Vial Number 25  
Injection Volume 250  
Injection 4 of 4  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 1/2/2014 5:30 PM  
Printed 2/22/2018 9:36 AM



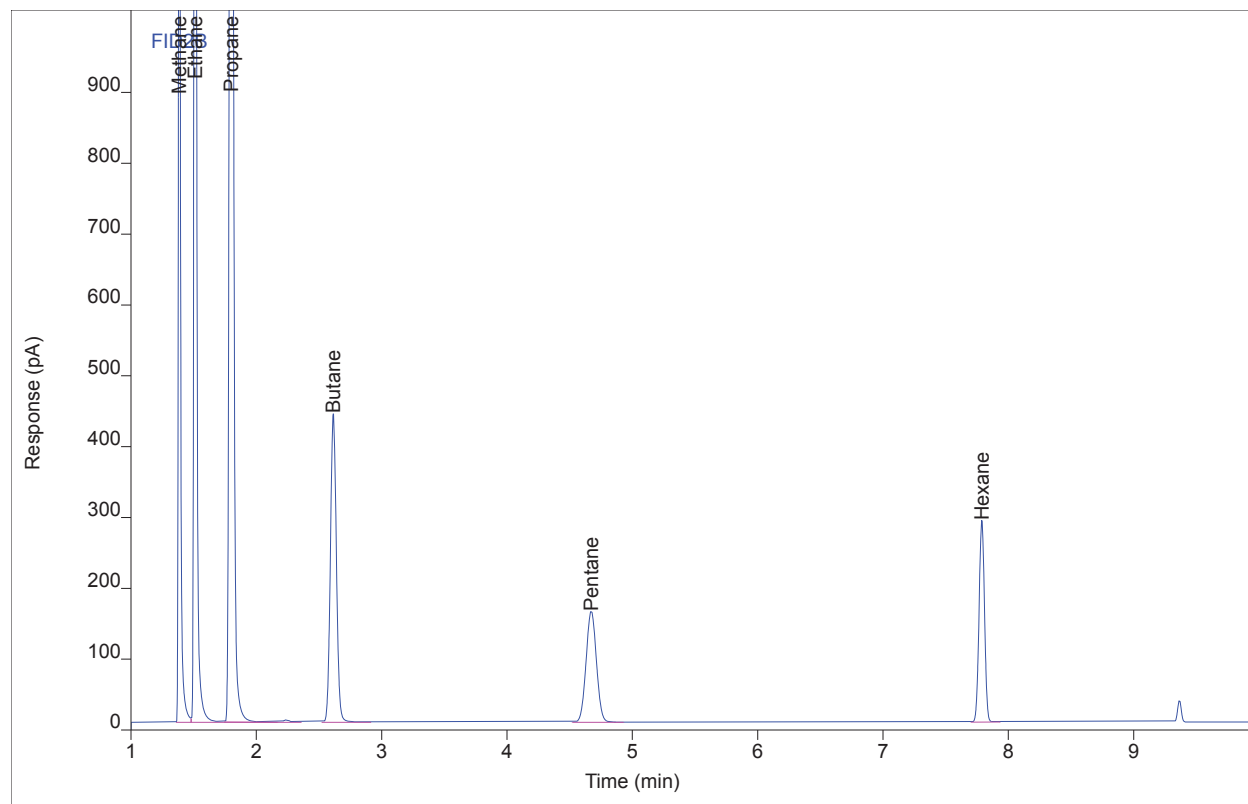
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.39 | 629.724 | 565.749 | 1787.19 | 1  | 1787.19 | ppm  |
| Ethane   | VV   | 1.51 | 1185.07 | 911.949 | 1797.84 | 1  | 1797.84 | ppm  |
| Propane  | VB   | 1.80 | 1780.76 | 913.993 | 1798.45 | 1  | 1798.45 | ppm  |
| Butane   | BB   | 2.61 | 473.985 | 142.712 | 362.624 | 1  | 362.624 | ppm  |
| Pentane  | BB   | 4.67 | 295.443 | 51.5371 | 180.660 | 1  | 180.660 | ppm  |
| Hexane   | BB   | 7.79 | 282.706 | 94.1035 | 145.009 | 1  | 145.009 | ppm  |

# Chromatogram Report

Sample Name BettyP773 #C6 ENV(1=1700,3=365.09)  
 Sequence Name BETTYP773 ver.7  
 Inj Data File 025B1102.D  
 File Location GC/2018/Betty/Quarter 1  
 Injection Date 2/16/2018 3:21 PM  
 File Modified 2/22/2018 9:19 AM  
 Instrument Betty  
 Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
 Vial Number 25  
 Injection Volume 250  
 Injection 2 of 4  
 Acquisition Method GC142P133\_CAL.M  
 Analysis Method BETTYP773\_C1-C7.M  
 Method Modified 1/2/2014 5:30 PM  
 Printed 2/22/2018 9:36 AM



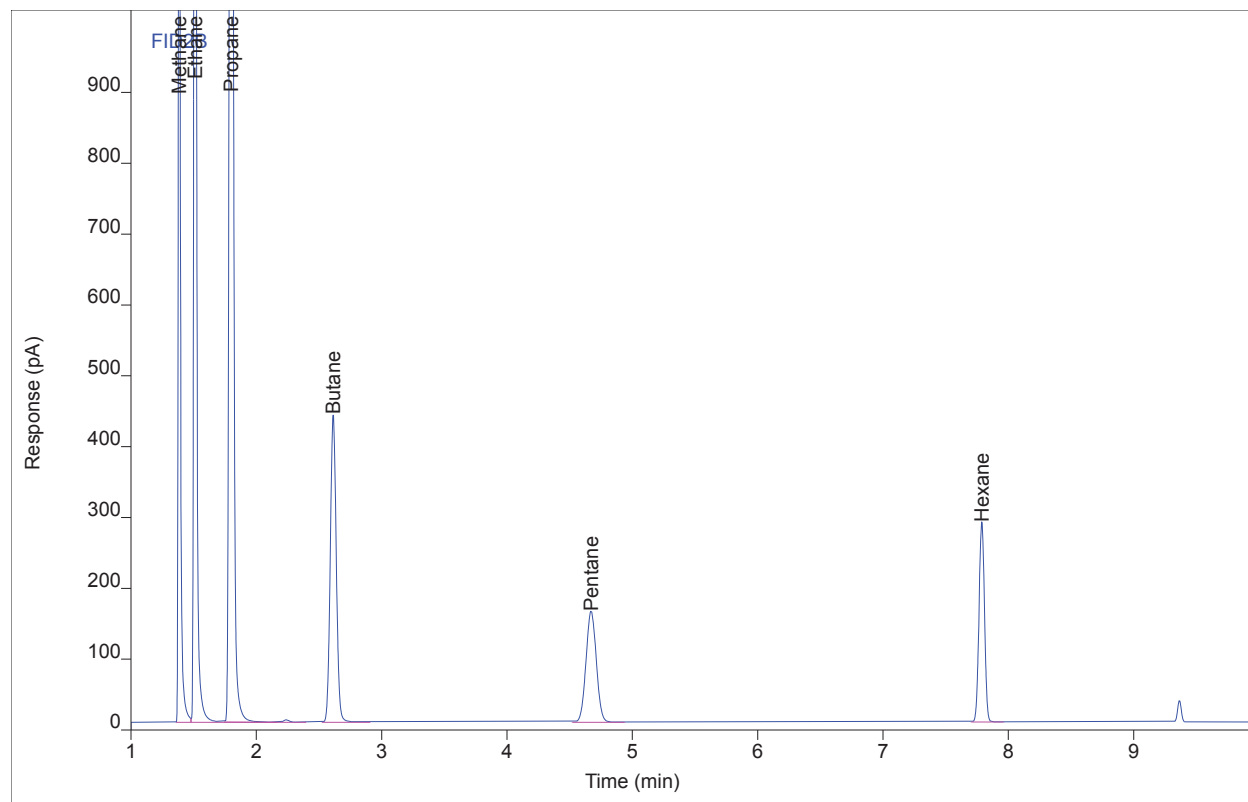
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.39 | 1926.40 | 1742.89 | 5467.79 | 1  | 5467.79 | ppm  |
| Ethane   | VB S | 1.51 | 3629.94 | 2796.19 | 5507.57 | 1  | 5507.57 | ppm  |
| Propane  | BV T | 1.80 | 5439.60 | 2789.89 | 5494.68 | 1  | 5494.68 | ppm  |
| Butane   | BB   | 2.61 | 1450.56 | 436.128 | 1110.14 | 1  | 1110.14 | ppm  |
| Pentane  | BB   | 4.67 | 903.786 | 157.261 | 553.126 | 1  | 553.126 | ppm  |
| Hexane   | BB   | 7.79 | 865.027 | 284.625 | 444.225 | 1  | 444.225 | ppm  |

# Chromatogram Report

Sample Name BettyP773 #C6 ENV(1=1700,3=365.09)  
 Sequence Name BETTYP773 ver.7  
 Inj Data File 025B1103.D  
 File Location GC/2018/Betty/Quarter 1  
 Injection Date 2/16/2018 3:44 PM  
 File Modified 2/22/2018 9:19 AM  
 Instrument Betty  
 Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
 Vial Number 25  
 Injection Volume 250  
 Injection 3 of 4  
 Acquisition Method GC142P133\_CAL.M  
 Analysis Method BETTYP773\_C1-C7.M  
 Method Modified 1/2/2014 5:30 PM  
 Printed 2/22/2018 9:36 AM



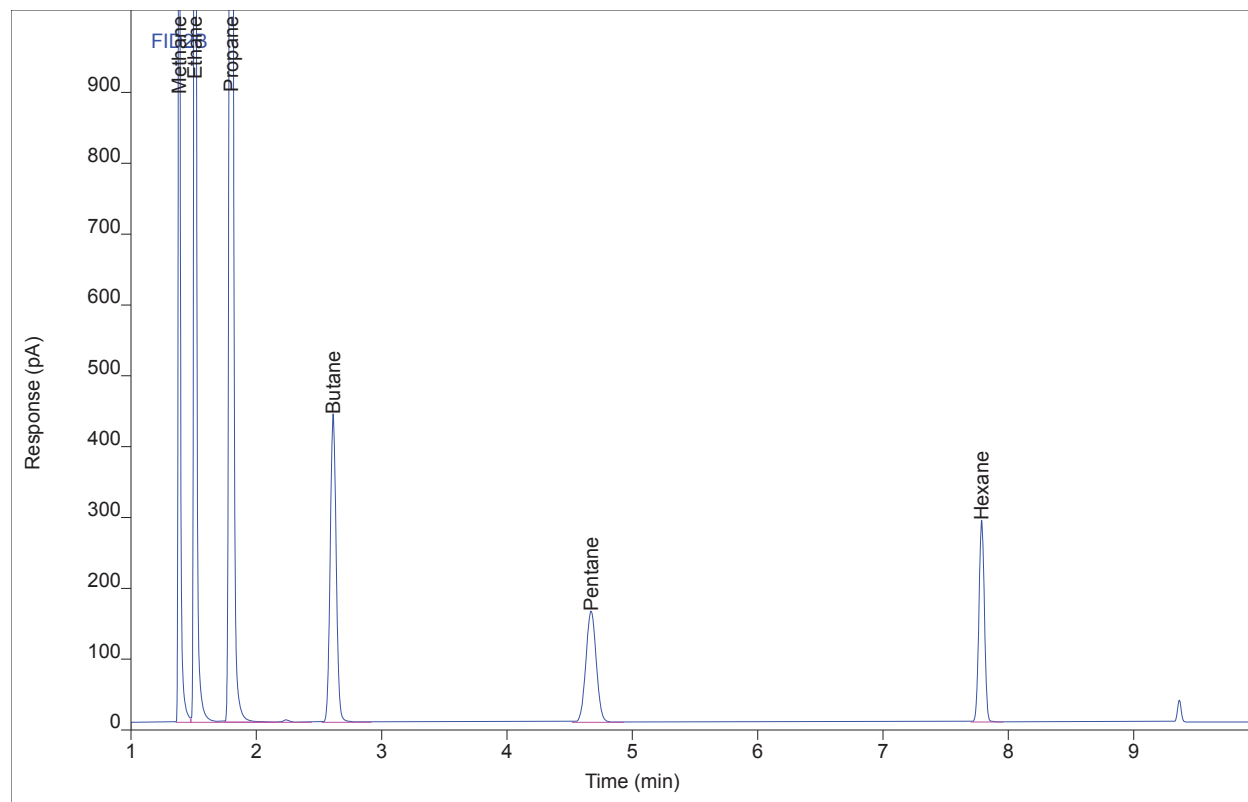
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.38 | 1923.59 | 1738.12 | 5459.82 | 1  | 5459.82 | ppm  |
| Ethane   | VB S | 1.51 | 3625.31 | 2787.84 | 5500.54 | 1  | 5500.54 | ppm  |
| Propane  | BV X | 1.80 | 5432.45 | 2785.46 | 5487.46 | 1  | 5487.46 | ppm  |
| Butane   | BB   | 2.61 | 1448.46 | 434.599 | 1108.54 | 1  | 1108.54 | ppm  |
| Pentane  | BB   | 4.67 | 902.542 | 157.242 | 552.364 | 1  | 552.364 | ppm  |
| Hexane   | BB   | 7.79 | 864.123 | 282.417 | 443.760 | 1  | 443.760 | ppm  |

# Chromatogram Report

Sample Name BettyP773 #C6 ENV(1=1700,3=365.09)  
 Sequence Name BETTYP773 ver.7  
 Inj Data File 025B1104.D  
 File Location GC/2018/Betty/Quarter 1  
 Injection Date 2/16/2018 4:07 PM  
 File Modified 2/22/2018 9:19 AM  
 Instrument Betty  
 Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
 Vial Number 25  
 Injection Volume 250  
 Injection 4 of 4  
 Acquisition Method GC142P133\_CAL.M  
 Analysis Method BETTYP773\_C1-C7.M  
 Method Modified 1/2/2014 5:30 PM  
 Printed 2/22/2018 9:36 AM



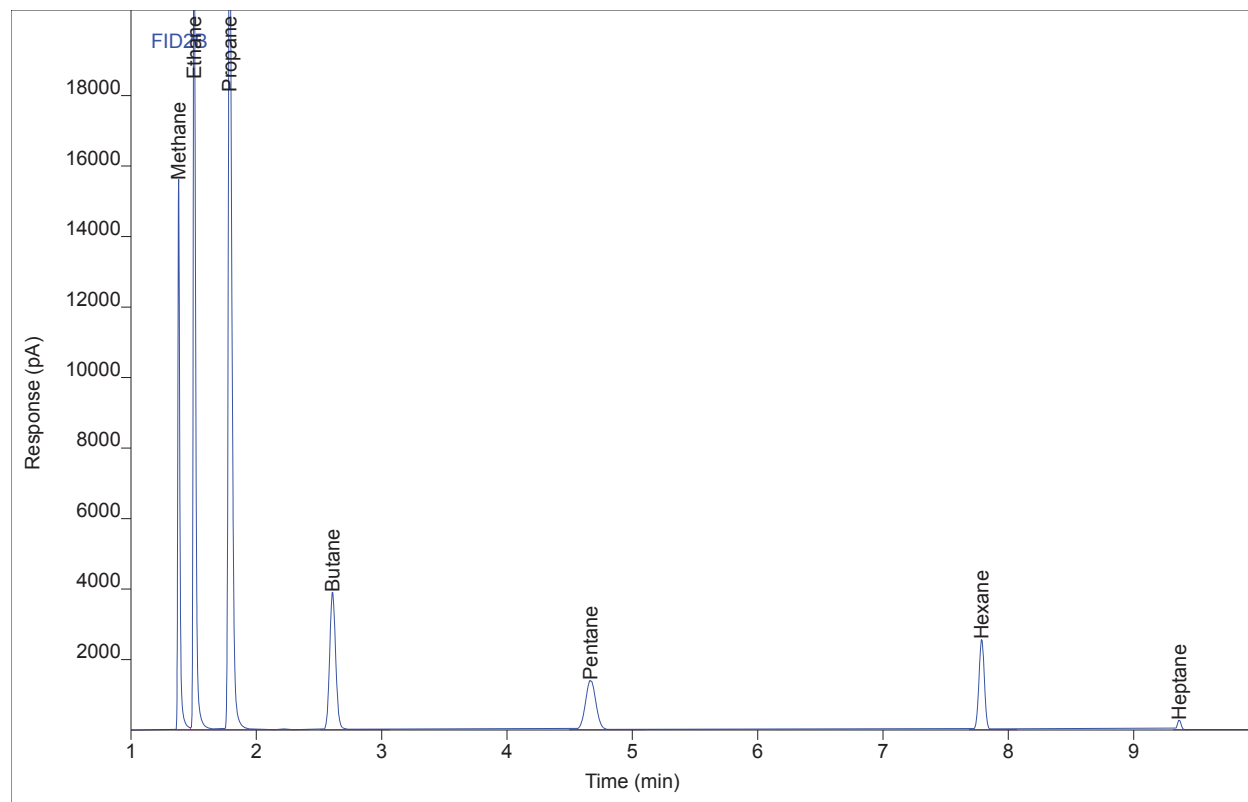
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.38 | 1925.34 | 1738.17 | 5464.78 | 1  | 5464.78 | ppm  |
| Ethane   | VB S | 1.51 | 3629.25 | 2800.41 | 5506.52 | 1  | 5506.52 | ppm  |
| Propane  | BV X | 1.80 | 5438.09 | 2785.91 | 5493.16 | 1  | 5493.16 | ppm  |
| Butane   | BB   | 2.61 | 1450.11 | 435.311 | 1109.80 | 1  | 1109.80 | ppm  |
| Pentane  | BB   | 4.67 | 903.693 | 157.115 | 553.069 | 1  | 553.069 | ppm  |
| Hexane   | BB   | 7.79 | 865.091 | 284.456 | 444.257 | 1  | 444.257 | ppm  |

# Chromatogram Report

Sample Name BettyP773 #C7 ENV(1=0,3=438.21)  
Sequence Name BETTYP773 ver.7  
Inj Data File 025B1202.D  
File Location GC/2018/Betty/Quarter 1  
Injection Date 2/16/2018 4:53 PM  
File Modified 2/22/2018 9:19 AM  
Instrument Betty  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
Vial Number 25  
Injection Volume 250  
Injection 2 of 4  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 1/2/2014 5:30 PM  
Printed 2/22/2018 9:35 AM



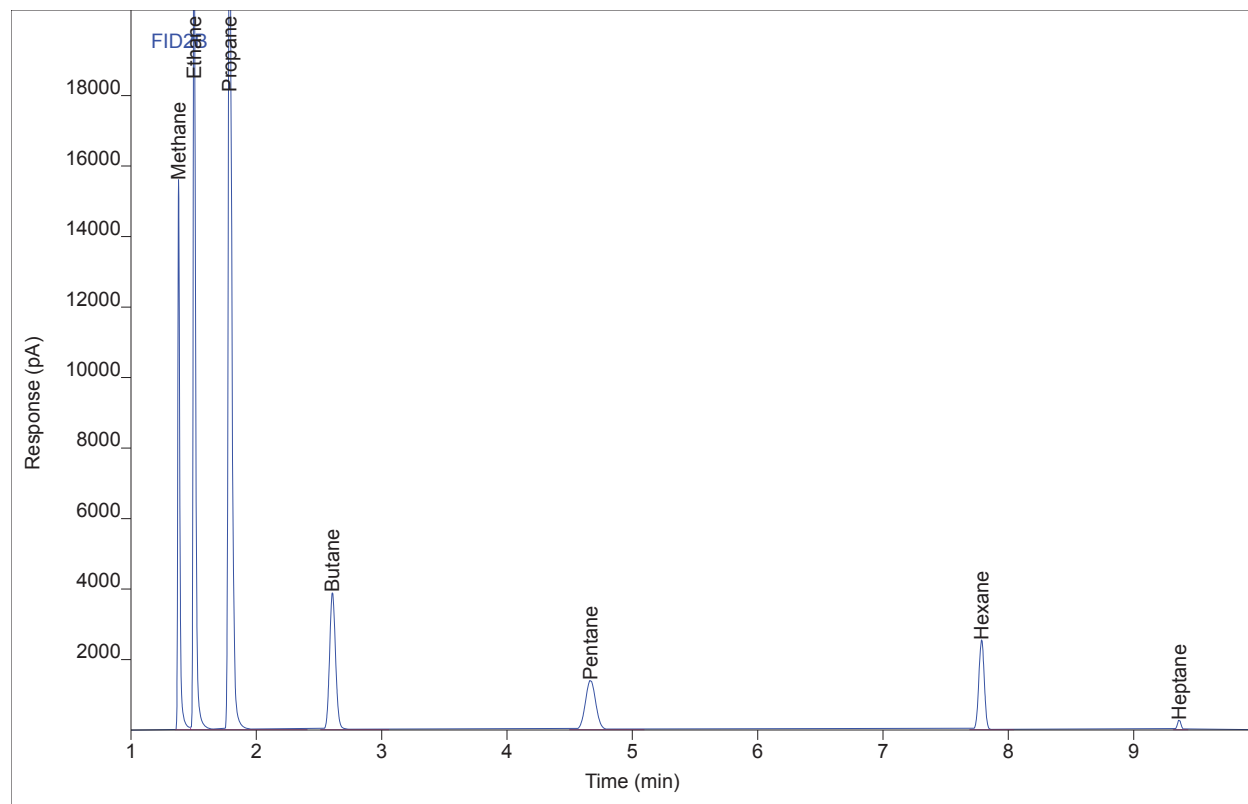
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.38 | 17500.4 | 15592.8 | 49674.3 | 1  | 49674.3 | ppm  |
| Ethane   | VV S | 1.50 | 32793.8 | 24862.2 | 49759.5 | 1  | 49759.5 | ppm  |
| Propane  | VB S | 1.79 | 49288.4 | 24422.6 | 49791.6 | 1  | 49791.6 | ppm  |
| Butane   | BB   | 2.61 | 13089.8 | 3909.51 | 10019.4 | 1  | 10019.4 | ppm  |
| Pentane  | BB   | 4.67 | 8153.55 | 1413.03 | 4991.88 | 1  | 4991.88 | ppm  |
| Hexane   | BB   | 7.79 | 7795.58 | 2562.81 | 4005.37 | 1  | 4005.37 | ppm  |
| Heptane  | BB   | 9.36 | 576.169 | 279.292 | 252.797 | 1  | 252.797 | ppm  |

# Chromatogram Report

Sample Name BettyP773 #C7 ENV(1=0,3=438.21)  
 Sequence Name BETTYP773 ver.7  
 Inj Data File 025B1203.D  
 File Location GC/2018/Betty/Quarter 1  
 Injection Date 2/16/2018 5:16 PM  
 File Modified 2/22/2018 9:19 AM  
 Instrument Betty  
 Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
 Vial Number 25  
 Injection Volume 250  
 Injection 3 of 4  
 Acquisition Method GC142P133\_CAL.M  
 Analysis Method BETTYP773\_C1-C7.M  
 Method Modified 1/2/2014 5:30 PM  
 Printed 2/22/2018 9:35 AM



| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.38 | 17443.8 | 15537.2 | 49513.6 | 1  | 49513.6 | ppm  |
| Ethane   | VV S | 1.50 | 32691.5 | 24747.2 | 49604.2 | 1  | 49604.2 | ppm  |
| Propane  | VB S | 1.79 | 49137.5 | 24333.0 | 49639.2 | 1  | 49639.2 | ppm  |
| Butane   | BB   | 2.61 | 13046.0 | 3893.41 | 9985.83 | 1  | 9985.83 | ppm  |
| Pentane  | BB   | 4.67 | 8126.22 | 1409.58 | 4975.15 | 1  | 4975.15 | ppm  |
| Hexane   | BB   | 7.79 | 7772.18 | 2547.73 | 3993.35 | 1  | 3993.35 | ppm  |
| Heptane  | BB   | 9.36 | 574.654 | 278.420 | 252.132 | 1  | 252.132 | ppm  |

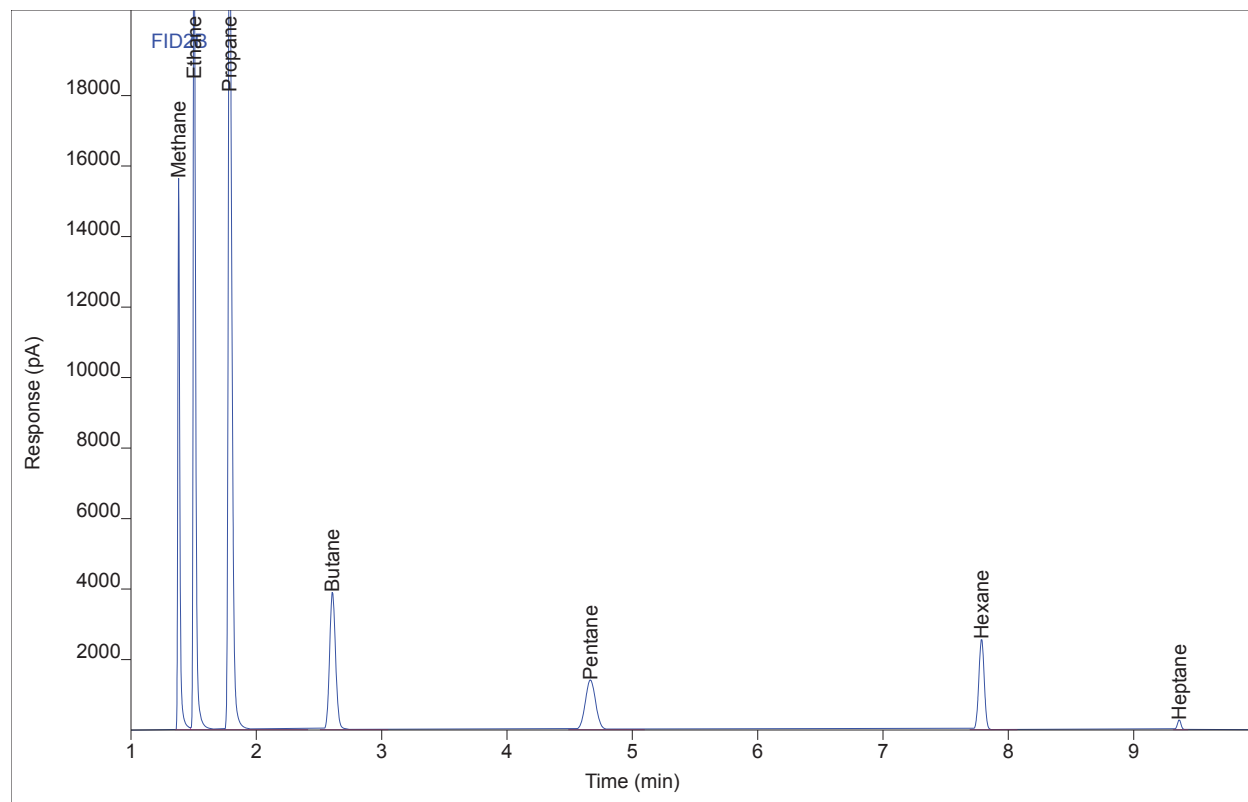


# Chromatogram Report

Sample Name BettyP773 #C7 ENV(1=0,3=438.21)  
 Sequence Name BETTYP773 ver.7  
 Inj Data File 025B1204.D  
 File Location GC/2018/Betty/Quarter 1  
 Injection Date 2/16/2018 5:40 PM  
 File Modified 2/22/2018 9:19 AM  
 Instrument Betty  
 Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
 Vial Number 25  
 Injection Volume 250  
 Injection 4 of 4  
 Acquisition Method GC142P133\_CAL.M  
 Analysis Method BETTYP773\_C1-C7.M  
 Method Modified 1/2/2014 5:30 PM  
 Printed 2/22/2018 9:35 AM



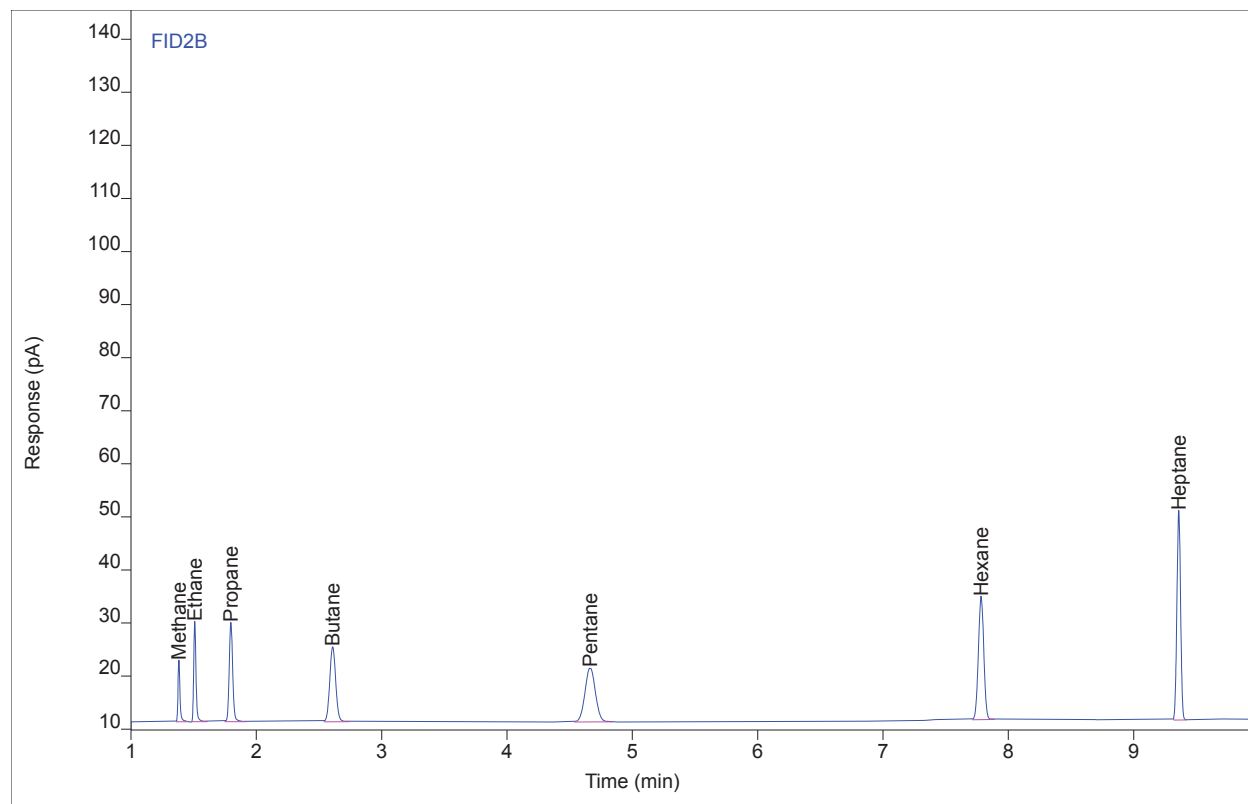
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.38 | 17528.9 | 15649.0 | 49755.1 | 1  | 49755.1 | ppm  |
| Ethane   | VV S | 1.50 | 32856.9 | 25027.5 | 49855.3 | 1  | 49855.3 | ppm  |
| Propane  | VB S | 1.79 | 49395.4 | 24486.2 | 49899.8 | 1  | 49899.8 | ppm  |
| Butane   | BB   | 2.61 | 13112.4 | 3909.04 | 10036.7 | 1  | 10036.7 | ppm  |
| Pentane  | BB   | 4.67 | 8167.97 | 1414.95 | 5000.71 | 1  | 5000.71 | ppm  |
| Hexane   | BB   | 7.79 | 7811.53 | 2571.84 | 4013.57 | 1  | 4013.57 | ppm  |
| Heptane  | BB   | 9.36 | 577.519 | 280.040 | 253.389 | 1  | 253.389 | ppm  |

# Chromatogram Report

Sample Name BettyP773 #C3 ENV(1=565.33,2=450)  
Sequence Name BETTYP773 ver.7  
Inj Data File 025B1503.D  
File Location GC/2018/Betty/Quarter 1  
Injection Date 2/19/2018 5:39 PM  
File Modified 2/22/2018 9:20 AM  
Instrument Betty  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
Vial Number 25  
Injection Volume 250  
Injection 3 of 5  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 1/2/2014 5:30 PM  
Printed 2/22/2018 9:37 AM



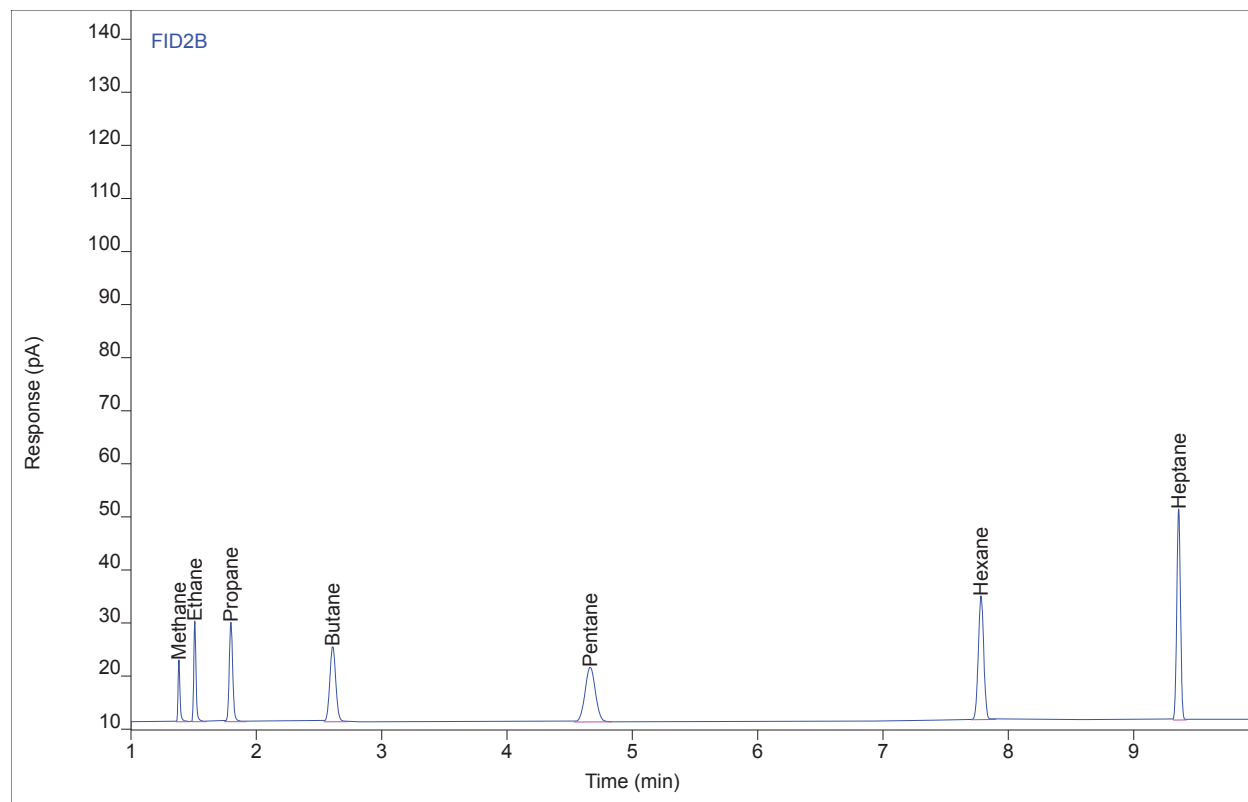
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.38 | 12.8807 | 11.6520 | 36.2888 | 1  | 36.2888 | ppm  |
| Ethane   | PB   | 1.51 | 24.1863 | 18.9735 | 36.3659 | 1  | 36.3659 | ppm  |
| Propane  | BB   | 1.80 | 36.6051 | 18.8290 | 36.4679 | 1  | 36.4679 | ppm  |
| Butane   | BB   | 2.61 | 46.9566 | 14.1925 | 35.7555 | 1  | 35.7555 | ppm  |
| Pentane  | BB   | 4.66 | 58.9851 | 10.2637 | 35.8862 | 1  | 35.8862 | ppm  |
| Hexane   | BB   | 7.78 | 70.1094 | 23.2364 | 35.7699 | 1  | 35.7699 | ppm  |
| Heptane  | BB   | 9.36 | 81.4405 | 39.4616 | 35.6427 | 1  | 35.6427 | ppm  |

# Chromatogram Report

Sample Name BettyP773 #C3 ENV(1=565.33,2=450)  
Sequence Name BETTYP773 ver.7  
Inj Data File 025B1504.D  
File Location GC/2018/Betty/Quarter 1  
Injection Date 2/19/2018 6:02 PM  
File Modified 2/22/2018 9:20 AM  
Instrument Betty  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
Vial Number 25  
Injection Volume 250  
Injection 4 of 5  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 1/2/2014 5:30 PM  
Printed 2/22/2018 9:37 AM



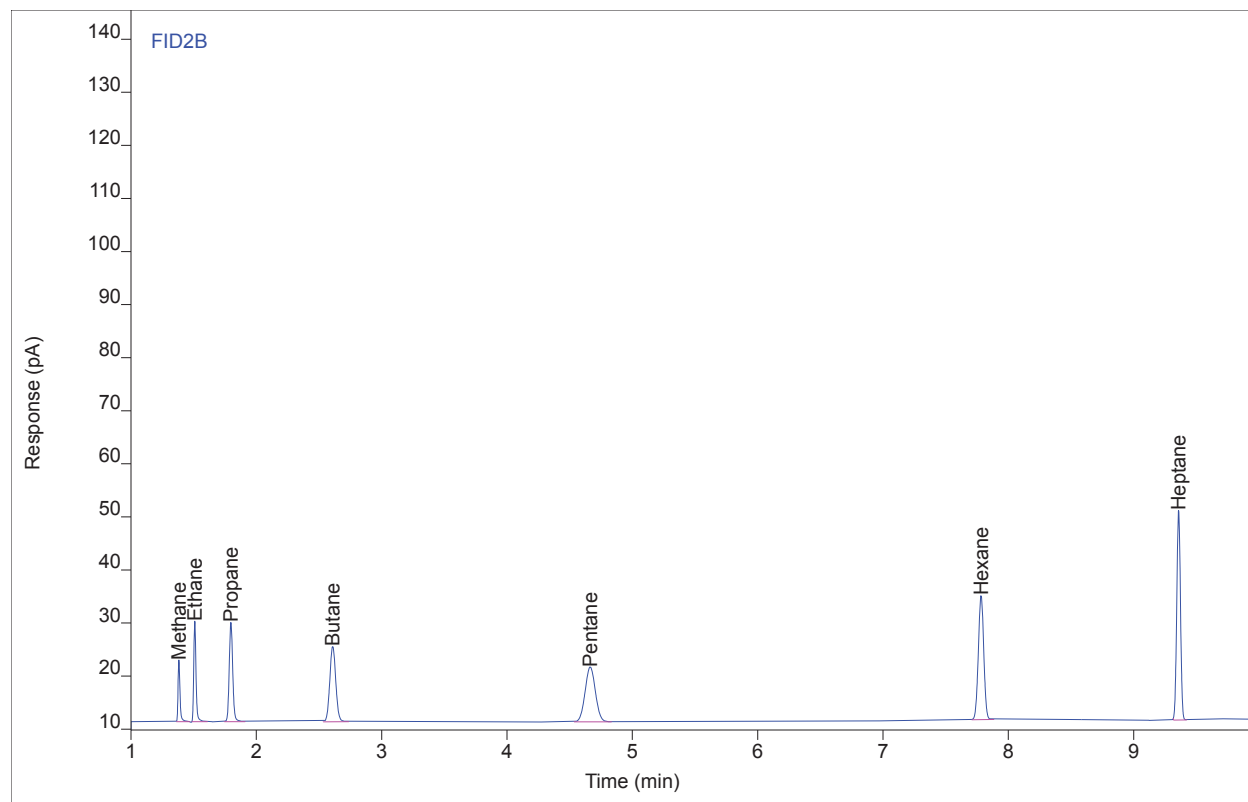
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BP   | 1.38 | 12.9393 | 11.5898 | 36.4553 | 1  | 36.4553 | ppm  |
| Ethane   | PB   | 1.51 | 24.1664 | 18.9240 | 36.3356 | 1  | 36.3356 | ppm  |
| Propane  | BB   | 1.80 | 36.6536 | 18.7980 | 36.5169 | 1  | 36.5169 | ppm  |
| Butane   | BB   | 2.61 | 47.1369 | 14.2418 | 35.8935 | 1  | 35.8935 | ppm  |
| Pentane  | BB   | 4.66 | 59.2716 | 10.3239 | 36.0616 | 1  | 36.0616 | ppm  |
| Hexane   | BB   | 7.78 | 70.5193 | 23.3326 | 35.9805 | 1  | 35.9805 | ppm  |
| Heptane  | BB   | 9.36 | 81.9037 | 39.7309 | 35.8460 | 1  | 35.8460 | ppm  |

# Chromatogram Report

Sample Name BettyP773 #C3 ENV(1=565.33,2=450)  
Sequence Name BETTYP773 ver.7  
Inj Data File 025B1505.D  
File Location GC/2018/Betty/Quarter 1  
Injection Date 2/19/2018 6:25 PM  
File Modified 2/22/2018 9:20 AM  
Instrument Betty  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
Vial Number 25  
Injection Volume 250  
Injection 5 of 5  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 1/2/2014 5:30 PM  
Printed 2/22/2018 9:37 AM



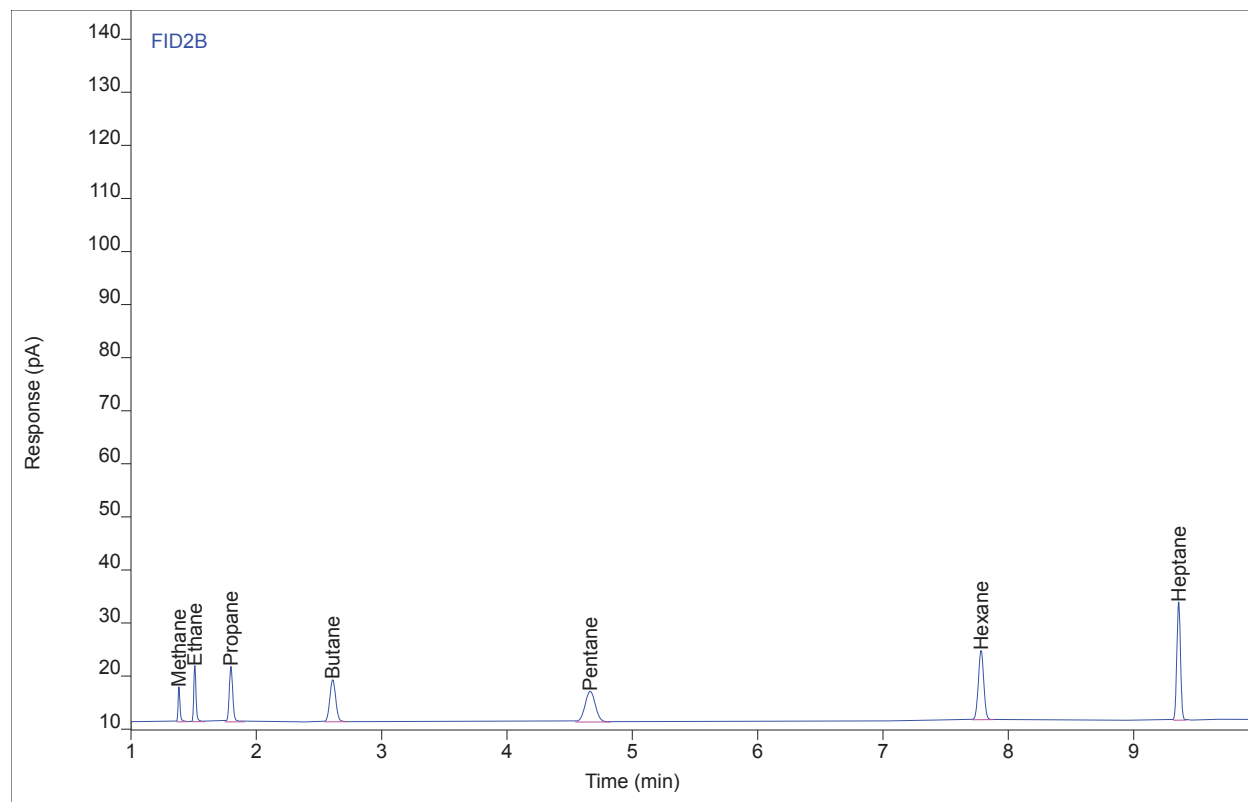
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BP   | 1.38 | 12.9182 | 11.5869 | 36.3953 | 1  | 36.3953 | ppm  |
| Ethane   | PB   | 1.51 | 24.1690 | 18.8910 | 36.3396 | 1  | 36.3396 | ppm  |
| Propane  | BB   | 1.80 | 36.5783 | 18.7748 | 36.4409 | 1  | 36.4409 | ppm  |
| Butane   | BB   | 2.61 | 47.2378 | 14.2835 | 35.9708 | 1  | 35.9708 | ppm  |
| Pentane  | BB   | 4.66 | 59.2884 | 10.3736 | 36.0719 | 1  | 36.0719 | ppm  |
| Hexane   | BB   | 7.78 | 70.4986 | 23.4541 | 35.9699 | 1  | 35.9699 | ppm  |
| Heptane  | BB   | 9.36 | 82.0437 | 39.4855 | 35.9074 | 1  | 35.9074 | ppm  |

# Chromatogram Report

Sample Name BettyP773 #C2 ENV(1=1130.66,2=400)  
Sequence Name BETTYP773 ver.7  
Inj Data File 025B1603.D  
File Location GC/2018/Betty/Quarter 1  
Injection Date 2/19/2018 7:35 PM  
File Modified 2/22/2018 9:20 AM  
Instrument Betty  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
Vial Number 25  
Injection Volume 250  
Injection 3 of 5  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 1/2/2014 5:30 PM  
Printed 2/22/2018 9:37 AM



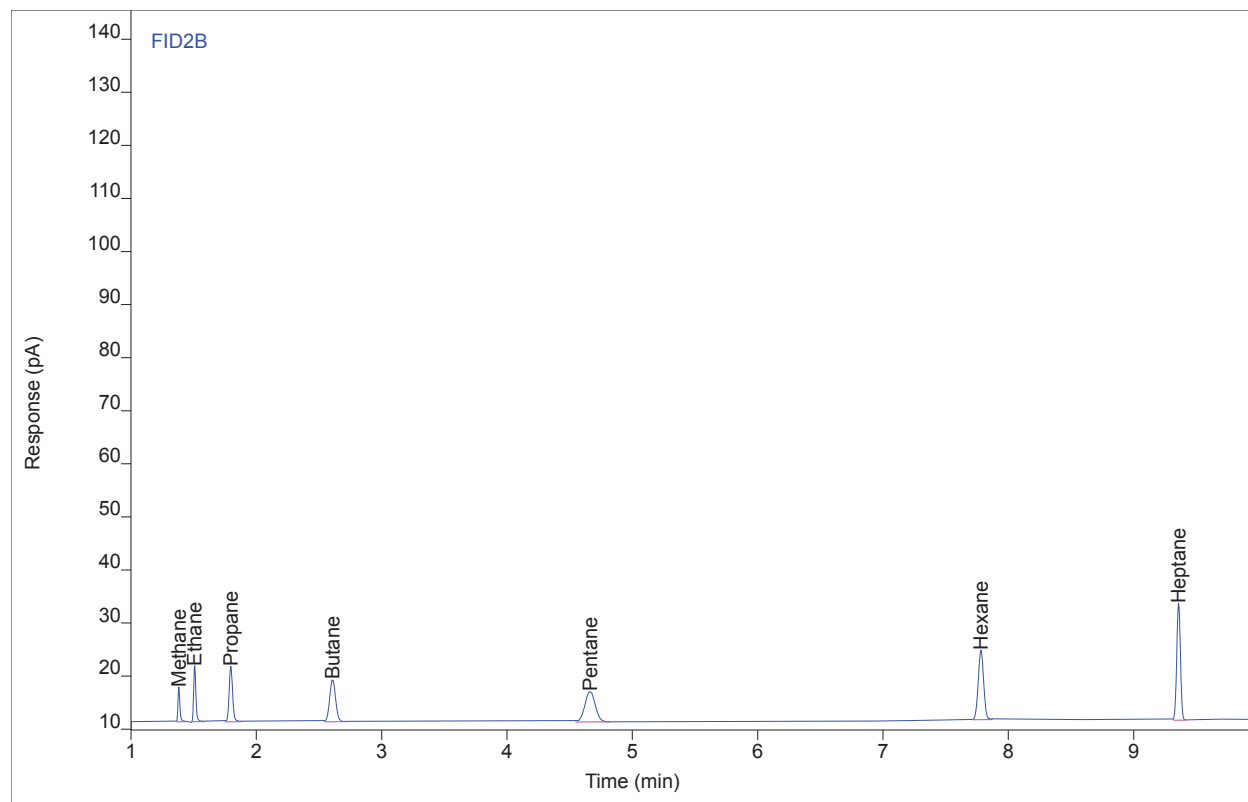
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.38 | 7.15522 | 6.53271 | 20.0372 | 1  | 20.0372 | ppm  |
| Ethane   | PB   | 1.51 | 13.3428 | 10.5508 | 19.9123 | 1  | 19.9123 | ppm  |
| Propane  | BB   | 1.80 | 20.3396 | 10.4517 | 20.0362 | 1  | 20.0362 | ppm  |
| Butane   | BB   | 2.61 | 26.2591 | 7.97768 | 19.9126 | 1  | 19.9126 | ppm  |
| Pentane  | BB   | 4.66 | 33.0174 | 5.79463 | 19.9871 | 1  | 19.9871 | ppm  |
| Hexane   | BB   | 7.78 | 39.3943 | 13.1276 | 19.9875 | 1  | 19.9875 | ppm  |
| Heptane  | BB   | 9.36 | 45.7573 | 22.3524 | 19.9800 | 1  | 19.9800 | ppm  |

# Chromatogram Report

Sample Name BettyP773 #C2 ENV(1=1130.66,2=400)  
Sequence Name BETTYP773 ver.7  
Inj Data File 025B1604.D  
File Location GC/2018/Betty/Quarter 1  
Injection Date 2/19/2018 7:58 PM  
File Modified 2/22/2018 9:20 AM  
Instrument Betty  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
Vial Number 25  
Injection Volume 250  
Injection 4 of 5  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 1/2/2014 5:30 PM  
Printed 2/22/2018 9:37 AM



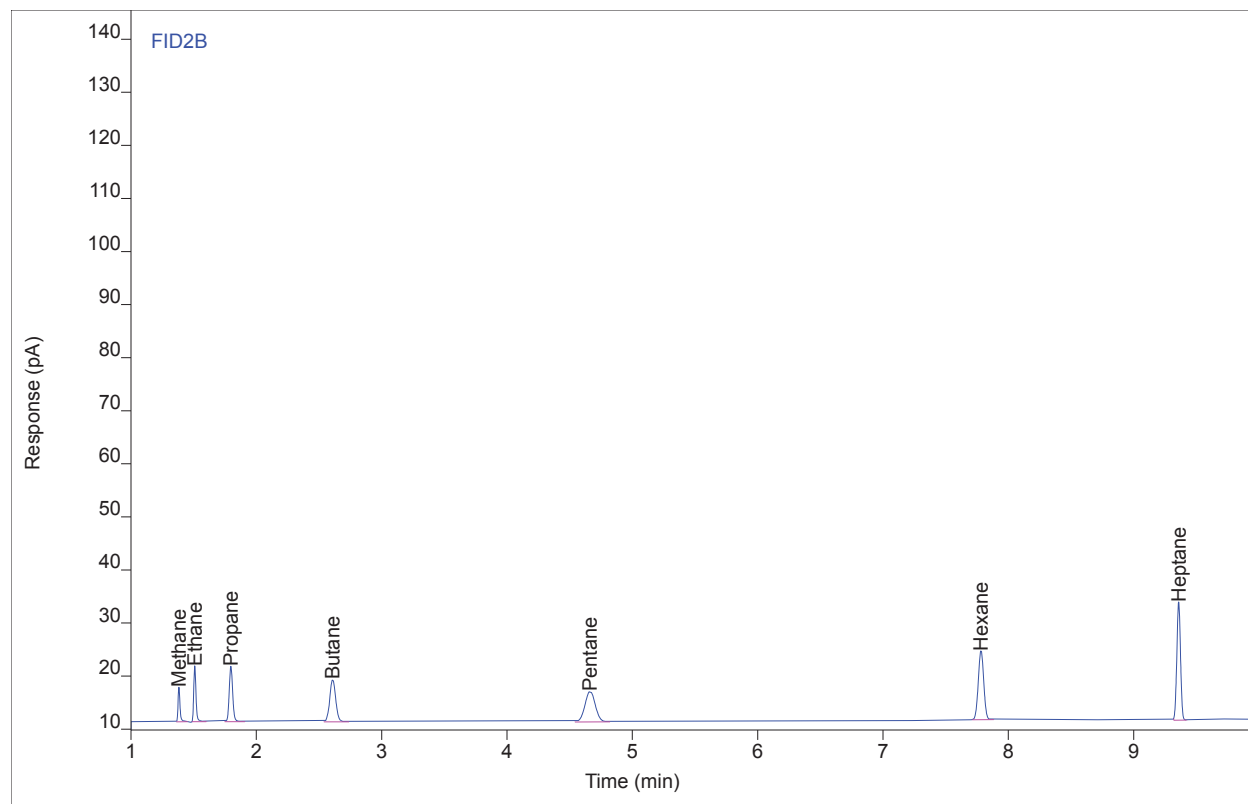
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.38 | 7.16378 | 6.56213 | 20.0614 | 1  | 20.0614 | ppm  |
| Ethane   | PB   | 1.51 | 13.3420 | 10.5733 | 19.9112 | 1  | 19.9112 | ppm  |
| Propane  | BB   | 1.80 | 20.2921 | 10.4921 | 19.9882 | 1  | 19.9882 | ppm  |
| Butane   | BB   | 2.61 | 26.3020 | 7.96534 | 19.9455 | 1  | 19.9455 | ppm  |
| Pentane  | BB   | 4.66 | 33.1046 | 5.76829 | 20.0405 | 1  | 20.0405 | ppm  |
| Hexane   | BB   | 7.78 | 39.4584 | 13.1530 | 20.0204 | 1  | 20.0204 | ppm  |
| Heptane  | BB   | 9.36 | 45.8967 | 21.9972 | 20.0412 | 1  | 20.0412 | ppm  |

# Chromatogram Report

Sample Name BettyP773 #C2 ENV(1=1130.66,2=400)  
 Sequence Name BETTYP773 ver.7  
 Inj Data File 025B1605.D  
 File Location GC/2018/Betty/Quarter 1  
 Injection Date 2/19/2018 8:22 PM  
 File Modified 2/22/2018 9:20 AM  
 Instrument Betty  
 Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
 Vial Number 25  
 Injection Volume 250  
 Injection 5 of 5  
 Acquisition Method GC142P133\_CAL.M  
 Analysis Method BETTYP773\_C1-C7.M  
 Method Modified 1/2/2014 5:30 PM  
 Printed 2/22/2018 9:37 AM



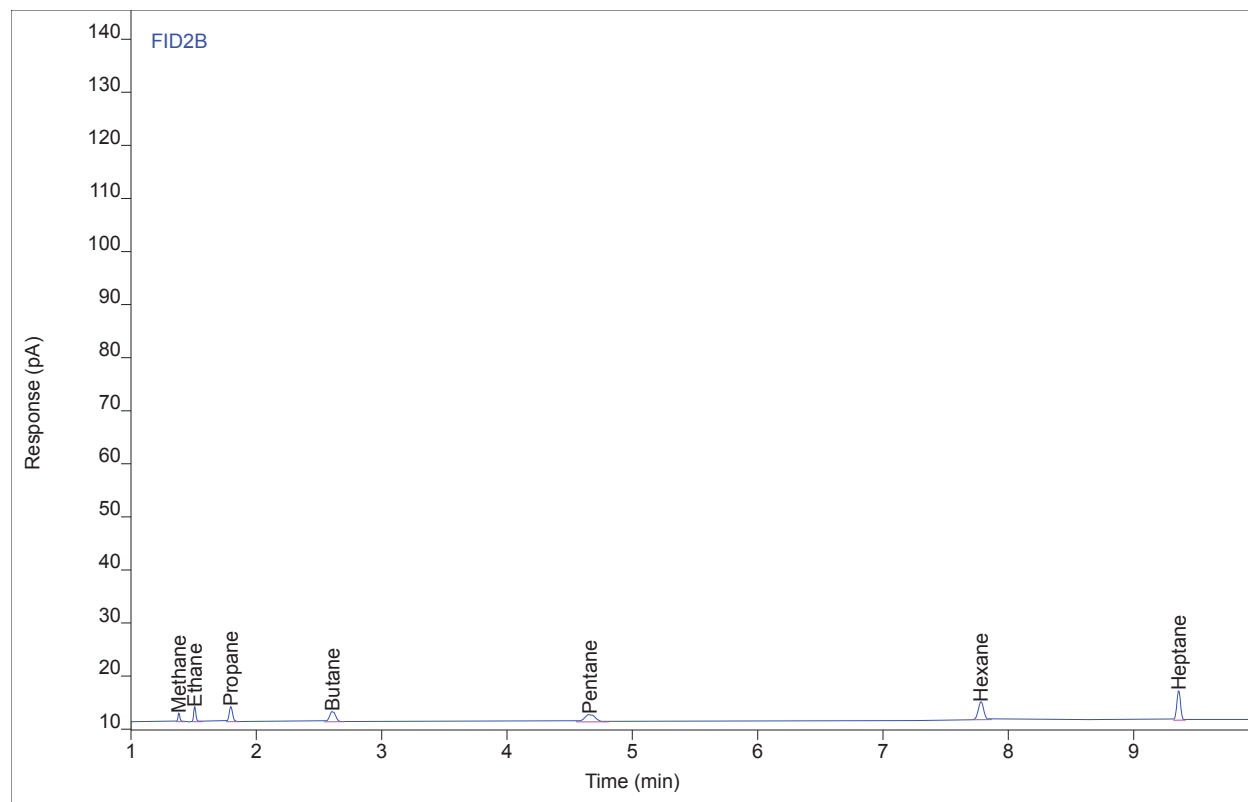
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.38 | 7.21708 | 6.55093 | 20.2127 | 1  | 20.2127 | ppm  |
| Ethane   | PB   | 1.51 | 13.3907 | 10.5606 | 19.9851 | 1  | 19.9851 | ppm  |
| Propane  | BB   | 1.80 | 20.3499 | 10.4654 | 20.0466 | 1  | 20.0466 | ppm  |
| Butane   | BB   | 2.61 | 26.4118 | 7.97175 | 20.0295 | 1  | 20.0295 | ppm  |
| Pentane  | BB   | 4.66 | 33.1951 | 5.79950 | 20.0960 | 1  | 20.0960 | ppm  |
| Hexane   | BB   | 7.78 | 39.5194 | 12.9753 | 20.0518 | 1  | 20.0518 | ppm  |
| Heptane  | BB   | 9.36 | 45.9188 | 22.2410 | 20.0509 | 1  | 20.0509 | ppm  |

# Chromatogram Report

Sample Name BettyP773 #C1 ENV(1=1342.66,2=100)  
 Sequence Name BETTYP773 ver.7  
 Inj Data File 025B1703.D  
 File Location GC/2018/Betty/Quarter 1  
 Injection Date 2/19/2018 9:31 PM  
 File Modified 2/22/2018 9:20 AM  
 Instrument Betty  
 Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
 Vial Number 25  
 Injection Volume 250  
 Injection 3 of 10  
 Acquisition Method GC142P133\_CAL.M  
 Analysis Method BETTYP773\_C1-C7.M  
 Method Modified 1/2/2014 5:30 PM  
 Printed 2/22/2018 9:37 AM



| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.38 | 1.83410 | 1.72188 | 4.93669 | 1  | 4.93669 | ppm  |
| Ethane   | PB   | 1.51 | 3.52163 | 2.83211 | 5.01023 | 1  | 5.01023 | ppm  |
| Propane  | BB   | 1.80 | 5.43305 | 2.84652 | 4.97942 | 1  | 4.97942 | ppm  |
| Butane   | BB   | 2.61 | 6.79641 | 2.06000 | 5.01493 | 1  | 5.01493 | ppm  |
| Pentane  | BB   | 4.66 | 8.48314 | 1.47859 | 4.96726 | 1  | 4.96726 | ppm  |
| Hexane   | BB   | 7.78 | 10.2616 | 3.40016 | 5.01813 | 1  | 5.01813 | ppm  |
| Heptane  | BB   | 9.36 | 11.6098 | 5.62992 | 4.99163 | 1  | 4.99163 | ppm  |

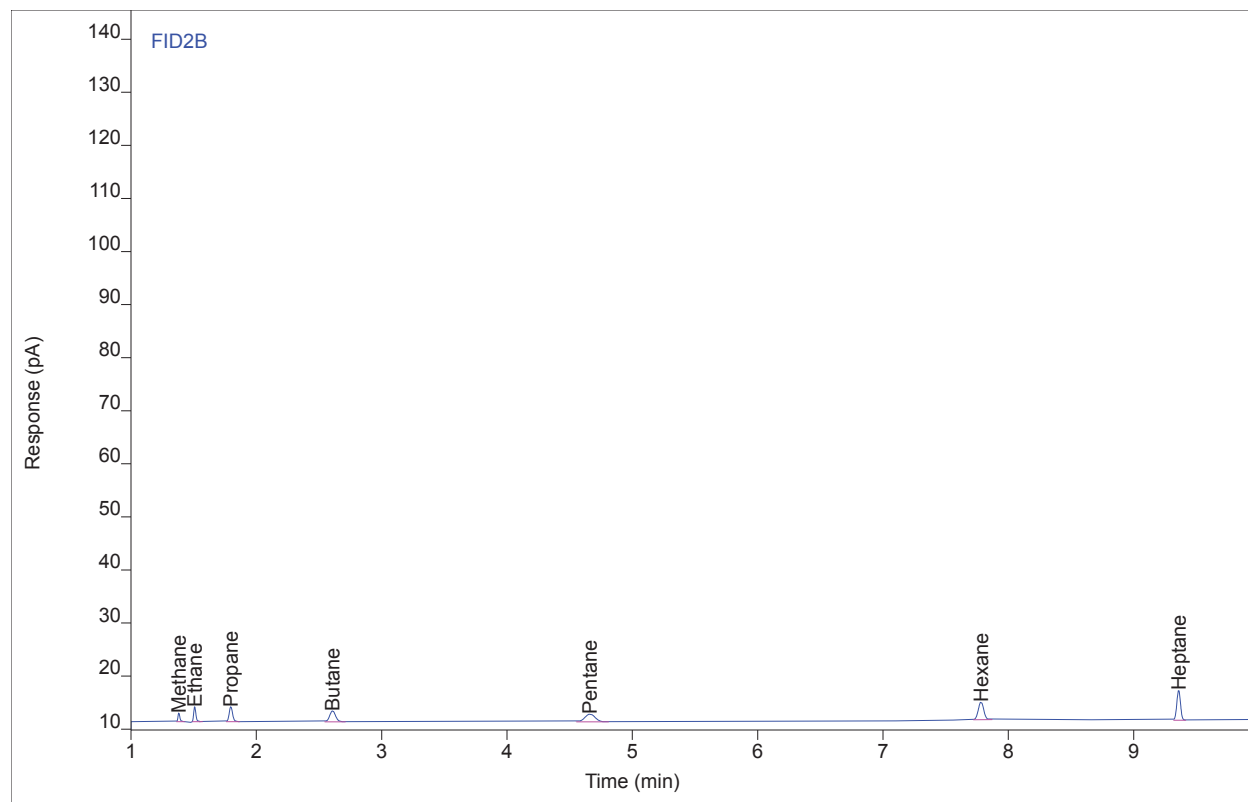


# Chromatogram Report

Sample Name BettyP773 #C1 ENV(1=1342.66,2=100)  
Sequence Name BETTYP773 ver.7  
Inj Data File 025B1704.D  
File Location GC/2018/Betty/Quarter 1  
Injection Date 2/19/2018 9:55 PM  
File Modified 2/22/2018 9:20 AM  
Instrument Betty  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
Vial Number 25  
Injection Volume 250  
Injection 4 of 10  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 1/2/2014 5:30 PM  
Printed 2/22/2018 9:37 AM



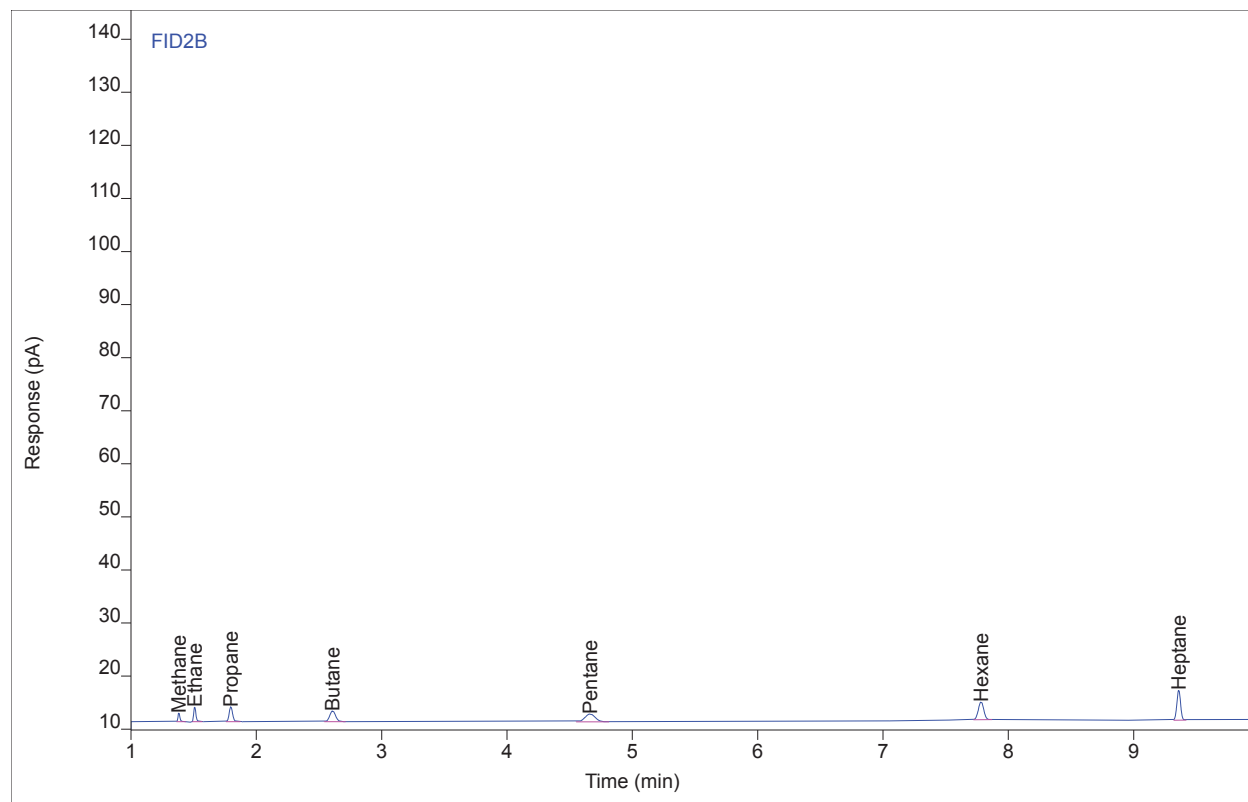
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.38 | 1.83776 | 1.73621 | 4.94653 | 1  | 4.94653 | ppm  |
| Ethane   | PB   | 1.51 | 3.49533 | 2.84066 | 4.97218 | 1  | 4.97218 | ppm  |
| Propane  | BB   | 1.80 | 5.43602 | 2.83212 | 4.98214 | 1  | 4.98214 | ppm  |
| Butane   | BB   | 2.61 | 6.81482 | 2.06645 | 5.02902 | 1  | 5.02902 | ppm  |
| Pentane  | BB   | 4.66 | 8.53314 | 1.49426 | 4.99654 | 1  | 4.99654 | ppm  |
| Hexane   | BB   | 7.78 | 10.2106 | 3.37984 | 4.99229 | 1  | 4.99229 | ppm  |
| Heptane  | BB   | 9.36 | 11.6536 | 5.67422 | 5.01071 | 1  | 5.01071 | ppm  |

# Chromatogram Report

Sample Name BettyP773 #C1 ENV(1=1342.66,2=100)  
 Sequence Name BETTYP773 ver.7  
 Inj Data File 025B1705.D  
 File Location GC/2018/Betty/Quarter 1  
 Injection Date 2/19/2018 10:18 PM  
 File Modified 2/22/2018 9:20 AM  
 Instrument Betty  
 Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
 Vial Number 25  
 Injection Volume 250  
 Injection 5 of 10  
 Acquisition Method GC142P133\_CAL.M  
 Analysis Method BETTYP773\_C1-C7.M  
 Method Modified 1/2/2014 5:30 PM  
 Printed 2/22/2018 9:37 AM



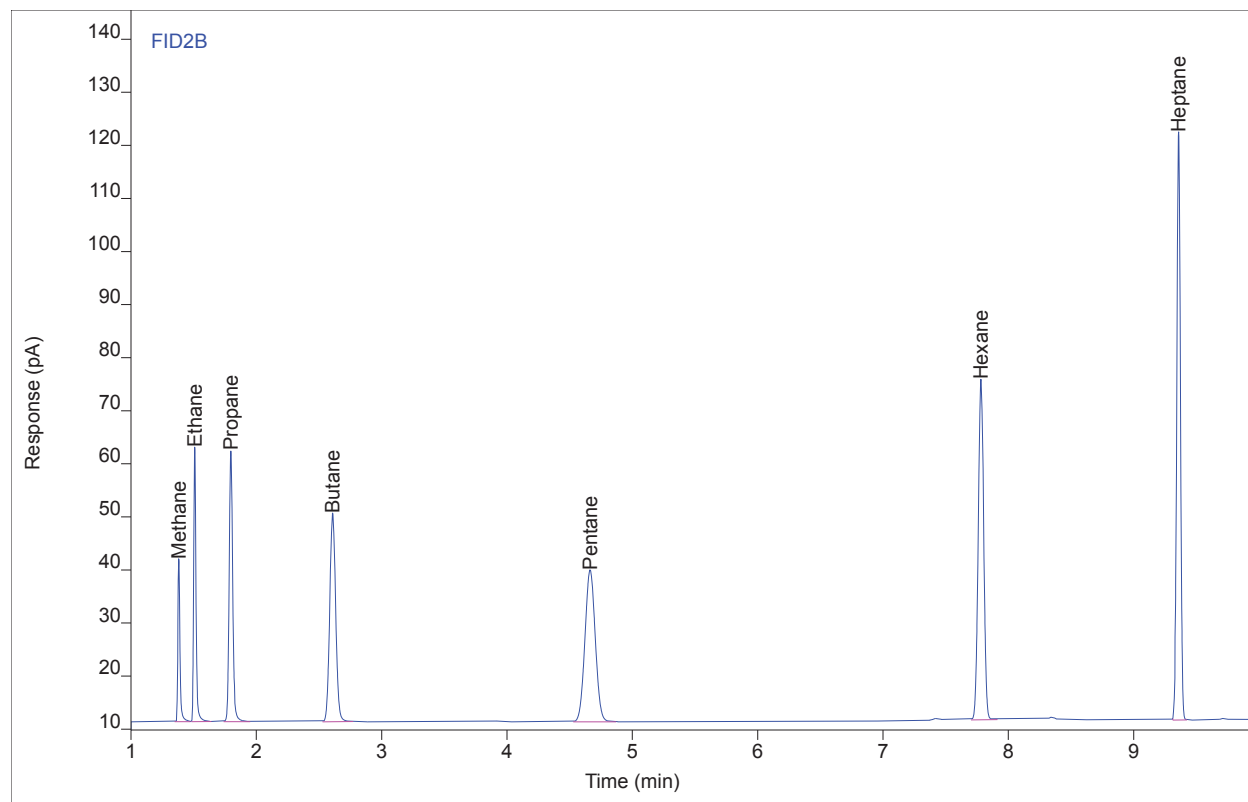
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.38 | 1.88211 | 1.73638 | 5.06950 | 1  | 5.06950 | ppm  |
| Ethane   | PB   | 1.51 | 3.51733 | 2.84500 | 5.00371 | 1  | 5.00371 | ppm  |
| Propane  | BB   | 1.80 | 5.46172 | 2.84196 | 5.00627 | 1  | 5.00627 | ppm  |
| Butane   | BB   | 2.61 | 6.73925 | 2.06294 | 4.97221 | 1  | 4.97221 | ppm  |
| Pentane  | BB   | 4.66 | 8.58453 | 1.49384 | 5.02785 | 1  | 5.02785 | ppm  |
| Hexane   | BB   | 7.78 | 10.2072 | 3.39745 | 4.99065 | 1  | 4.99065 | ppm  |
| Heptane  | BB   | 9.36 | 11.6403 | 5.67769 | 5.00486 | 1  | 5.00486 | ppm  |

# Chromatogram Report

Sample Name BettyP773 #C4 ENV(1=0,2=450)  
Sequence Name BETTYP773 ver.7  
Inj Data File 025B2002.D  
File Location GC/2018/Betty/Quarter 1  
Injection Date 2/20/2018 2:40 AM  
File Modified 2/22/2018 9:20 AM  
Instrument Betty  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
Vial Number 25  
Injection Volume 250  
Injection 2 of 4  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 1/2/2014 5:30 PM  
Printed 2/22/2018 9:37 AM



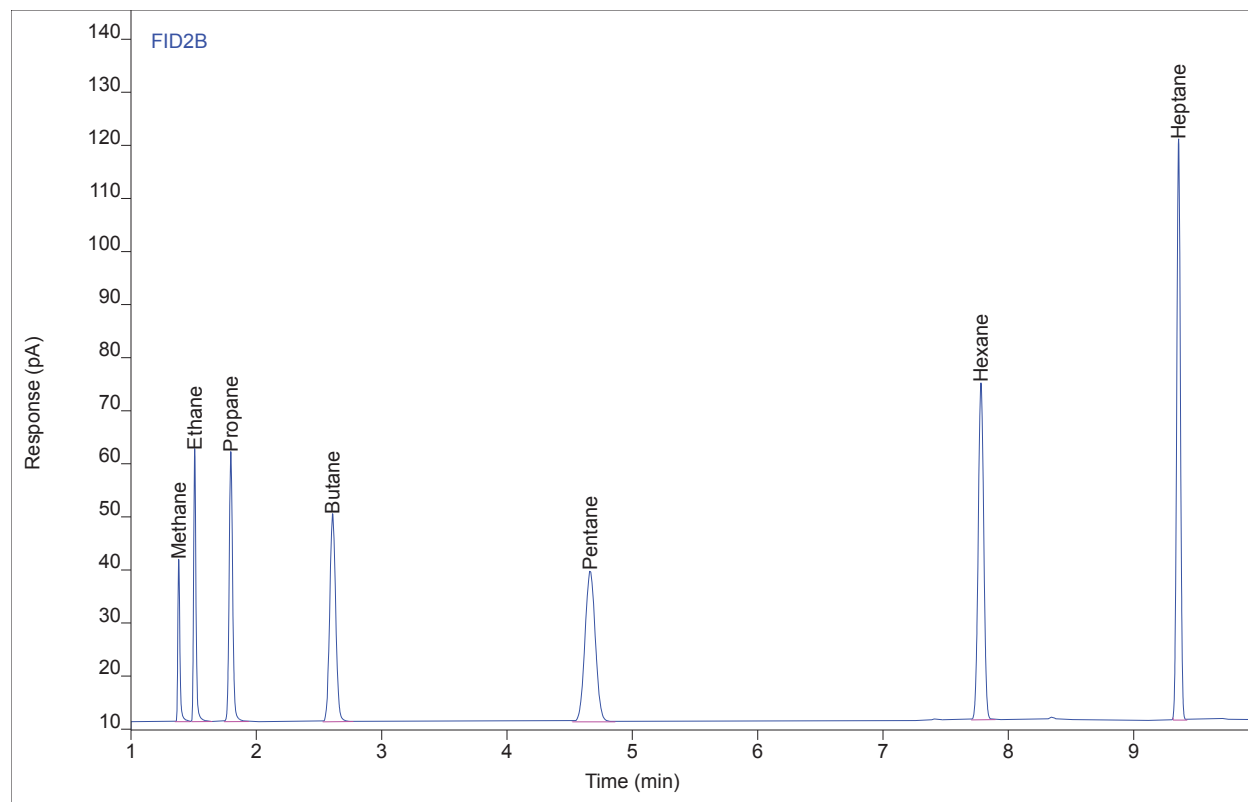
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BP   | 1.38 | 36.0835 | 30.6739 | 102.150 | 1  | 102.150 | ppm  |
| Ethane   | PB   | 1.51 | 67.0489 | 51.6700 | 101.404 | 1  | 101.404 | ppm  |
| Propane  | BB   | 1.80 | 100.482 | 51.0999 | 100.998 | 1  | 100.998 | ppm  |
| Butane   | BB   | 2.61 | 130.784 | 39.3086 | 99.9209 | 1  | 99.9209 | ppm  |
| Pentane  | BB   | 4.66 | 164.374 | 28.6474 | 100.412 | 1  | 100.412 | ppm  |
| Hexane   | BB   | 7.78 | 195.290 | 64.1120 | 100.092 | 1  | 100.092 | ppm  |
| Heptane  | BB   | 9.36 | 228.037 | 110.594 | 99.9893 | 1  | 99.9893 | ppm  |

# Chromatogram Report

Sample Name BettyP773 #C4 ENV(1=0,2=450)  
Sequence Name BETTYP773 ver.7  
Inj Data File 025B2003.D  
File Location GC/2018/Betty/Quarter 1  
Injection Date 2/20/2018 3:03 AM  
File Modified 2/22/2018 9:21 AM  
Instrument Betty  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
Vial Number 25  
Injection Volume 250  
Injection 3 of 4  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 1/2/2014 5:30 PM  
Printed 2/22/2018 9:37 AM



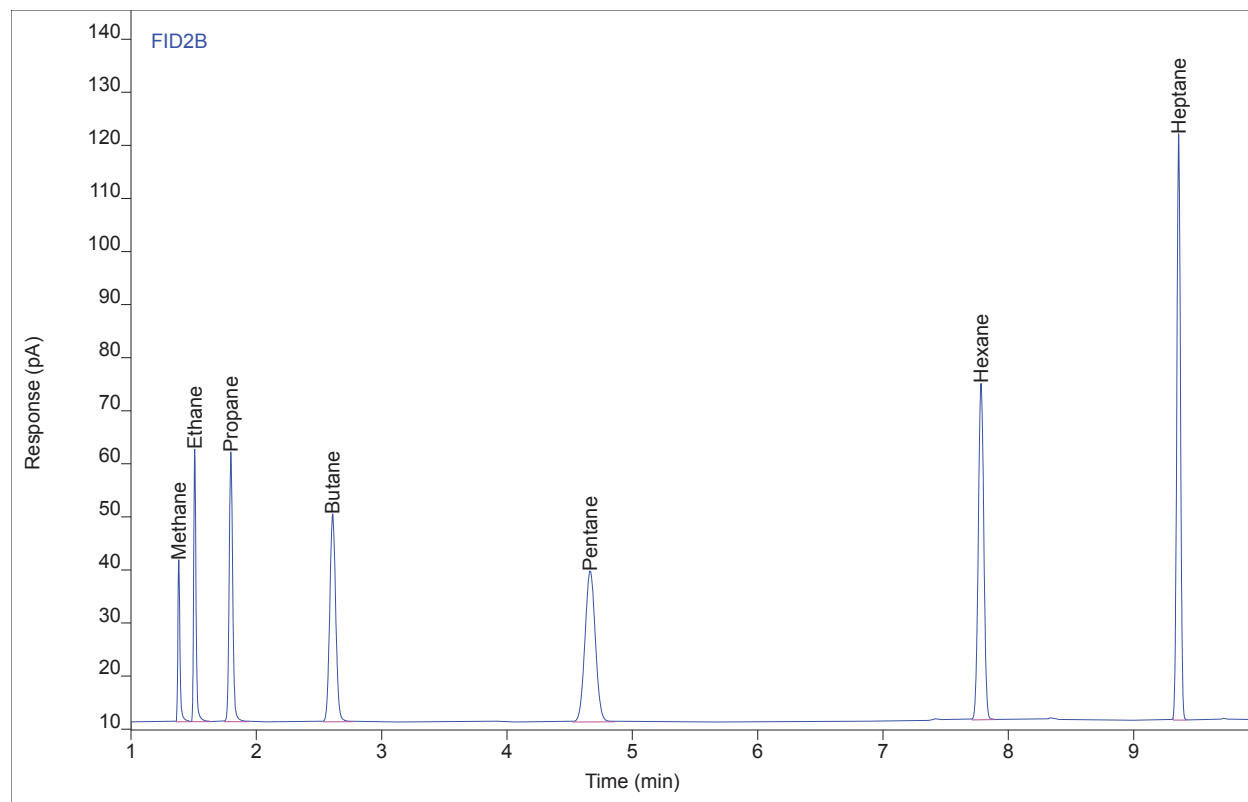
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BP   | 1.38 | 35.8568 | 30.4988 | 101.506 | 1  | 101.506 | ppm  |
| Ethane   | PB   | 1.51 | 66.6901 | 51.3969 | 100.859 | 1  | 100.859 | ppm  |
| Propane  | BB   | 1.80 | 99.9393 | 50.8724 | 100.450 | 1  | 100.450 | ppm  |
| Butane   | BB   | 2.61 | 130.367 | 39.2007 | 99.6016 | 1  | 99.6016 | ppm  |
| Pentane  | BB   | 4.66 | 163.745 | 28.5079 | 100.027 | 1  | 100.027 | ppm  |
| Hexane   | BB   | 7.78 | 194.455 | 63.4382 | 99.6628 | 1  | 99.6628 | ppm  |
| Heptane  | BB   | 9.36 | 227.324 | 109.164 | 99.6761 | 1  | 99.6761 | ppm  |

# Chromatogram Report

Sample Name BettyP773 #C4 ENV(1=0,2=450)  
Sequence Name BETTYP773 ver.7  
Inj Data File 025B2004.D  
File Location GC/2018/Betty/Quarter 1  
Injection Date 2/20/2018 3:27 AM  
File Modified 2/22/2018 9:21 AM  
Instrument Betty  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
Vial Number 25  
Injection Volume 250  
Injection 4 of 4  
Acquisition Method GC142P133\_CAL.M  
Analysis Method BETTYP773\_C1-C7.M  
Method Modified 1/2/2014 5:30 PM  
Printed 2/22/2018 9:37 AM



| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BP   | 1.38 | 35.8308 | 30.4474 | 101.432 | 1  | 101.432 | ppm  |
| Ethane   | PB   | 1.51 | 66.6858 | 51.3447 | 100.853 | 1  | 100.853 | ppm  |
| Propane  | BB   | 1.80 | 99.7915 | 50.8573 | 100.300 | 1  | 100.300 | ppm  |
| Butane   | BB   | 2.61 | 130.318 | 39.1687 | 99.5642 | 1  | 99.5642 | ppm  |
| Pentane  | BB   | 4.66 | 163.710 | 28.4499 | 100.005 | 1  | 100.005 | ppm  |
| Hexane   | BB   | 7.78 | 194.360 | 63.4205 | 99.6141 | 1  | 99.6141 | ppm  |
| Heptane  | BB   | 9.36 | 227.225 | 110.277 | 99.6326 | 1  | 99.6326 | ppm  |

# CERTIFICATE OF ANALYSIS

## Grade of Product: CERTIFIED STANDARD-SPEC

|                  |                           |                    |                 |
|------------------|---------------------------|--------------------|-----------------|
| Part Number:     | X08NI99C15A0079           | Reference Number:  | 141-124578026-1 |
| Cylinder Number: | CC72412                   | Cylinder Volume:   | 144.4 CF        |
| Laboratory:      | 124 - Conley Stryker - OH | Cylinder Pressure: | 2015 PSIG       |
| Analysis Date:   | Sep 19, 2016              | Valve Outlet:      | 350             |
| Lot Number:      | 141-124578026-1           |                    |                 |

**Expiration Date: Sep 19, 2019**

Product composition verified by direct comparison to calibration standards traceable to N.I.S.T. weights and/or N.I.S.T. Gas Mixture reference materials.

## ANALYTICAL RESULTS

| Component | Req Conc  | Actual Concentration<br>(Mole %) | Analytical<br>Uncertainty |
|-----------|-----------|----------------------------------|---------------------------|
| ETHANE    | 100.0 PPM | 100.0 PPM                        | +/- 2%                    |
| HEXANE    | 100.0 PPM | 100.0 PPM                        | +/- 2%                    |
| METHANE   | 100.0 PPM | 100.0 PPM                        | +/- 2%                    |
| N BUTANE  | 100.0 PPM | 100.0 PPM                        | +/- 2%                    |
| N HEPTANE | 100.0 PPM | 100.0 PPM                        | +/- 2%                    |
| N PENTANE | 100.0 PPM | 100.0 PPM                        | +/- 2%                    |
| PROPANE   | 100.0 PPM | 100.0 PPM                        | +/- 2%                    |
| NITROGEN  | Balance   |                                  |                           |



Approved for Release

# CERTIFICATE OF ANALYSIS

## Grade of Product: CERTIFIED HYDROCARBON

Customer: MONTROSE ENVIRONMENTAL GROUP  
Part Number: X08NI83C15AC015  
Cylinder Number: SG9164133BAL  
Laboratory: 124 - LaPorte Mix (SAP) - TX  
Analysis Date: Jul 14, 2016  
Lot Number: 126-400739490-1

Reference Number: 126-400739490-1  
Cylinder Volume: 15.8 CF  
Cylinder Pressure: 204 PSIG  
Valve Outlet: 350  
Expiration Date: Jul 14, 2019

Traceability Statement: Hydrocarbon Process standards are NIST traceable either directly by weight or by comparison to Airgas laboratory standards that are directly NIST traceable by weight.

### CERTIFIED CONCENTRATIONS

| Component | Requested Concentration | Reported Mole % | Accuracy |
|-----------|-------------------------|-----------------|----------|
| N HEPTANE | 250.0 PPM               | 251.2 PPM       | +/- 2%   |
| HEXANE    | 0.4000 %                | 0.4001 %        | +/- 2%   |
| N PENTANE | 0.5000 %                | 0.4995 %        | +/- 2%   |
| N BUTANE  | 1.000 %                 | 0.9991 %        | +/- 2%   |
| ETHANE    | 5.000 %                 | 4.995 %         | +/- 2%   |
| METHANE   | 5.000 %                 | 4.992 %         | +/- 2%   |
| PROPANE   | 5.000 %                 | 4.997 %         | +/- 2%   |
| NITROGEN  | Balance                 | Balance         |          |

Notes:.

PO# 06201603

Signature on file

Approved for Release



=====

6890 GC METHOD

=====

OVEN

|                              |                              |
|------------------------------|------------------------------|
| Initial temp: 40 C (On)      | Maximum temp: 250 C          |
| Initial time: 6.00 min       | Equilibration time: 0.50 min |
| Ramps:                       |                              |
| # Rate Final temp Final time | CRYO (N2)                    |
| 1 30.00 220 2.00             | Cryo: Off                    |
| 2 0 (Off)                    | Cryo fault: On               |
| Post temp: 40 C              | Cryo timeout: 40.00 min (On) |
| Post time: 0.00 min          | Quick cryo cool: Off         |
| Run time: 14.00 min          | Ambient temp: 30 C           |

FRONT INLET (SPLIT/SPLITLESS)

Mode: Splitless  
Initial temp: 200 C (On)  
Pressure: 60.0 psi (On)  
Purge flow: 0.0 mL/min  
Purge time: 0.00 min  
Total flow: 12.3 mL/min  
Gas saver: Off  
Gas type: Helium

BACK INLET (SPLIT/SPLITLESS)

Mode: Split  
Initial temp: 200 C (On)  
Pressure: 11.6 psi (On)  
Split ratio: 5:1  
Split flow: 12.3 mL/min  
Total flow: 17.6 mL/min  
Gas saver: Off  
Gas type: Helium

COLUMN 1

Packed Column  
Model Number: 19808  
Description: Rt-ShinCarbon 2m x 1mm I  
Max temperature: 250 C  
Mode: constant pressure  
Pressure: 60.0 psi  
Inlet: Front Inlet  
Outlet: Front Detector  
Outlet pressure: ambient

COLUMN 2

Capillary Column  
Model Number: 10198  
Description: Rtx-1 30m x 0.32mm x 4um  
Max temperature: 250 C  
Nominal length: 30.0 m  
Nominal diameter: 320.00 um  
Nominal film thickness: 4.00 um  
Mode: constant flow  
Initial flow: 2.5 mL/min  
Nominal init pressure: 11.6 psi  
Average velocity: 39 cm/sec  
Inlet: Back Inlet  
Outlet: (other)  
Outlet pressure: ambient

FRONT DETECTOR (TCD)

Temperature: 275 C (On)  
Reference flow: 20.0 mL/min (On)  
Mode: Constant makeup flow  
Makeup flow: 10.0 mL/min (On)  
Makeup Gas Type: Helium  
Filament: On  
Negative polarity: On

BACK DETECTOR (FID)

Temperature: 250 C (On)  
Hydrogen flow: 60.0 mL/min (On)  
Air flow: 450.0 mL/min (On)  
Mode: Constant makeup flow  
Makeup flow: 40.0 mL/min (On)  
Makeup Gas Type: Nitrogen  
Flame: On  
Electrometer: On  
Lit offset: 2.0

SIGNAL 1

Data rate: 20 Hz  
Type: front detector  
Save Data: On

SIGNAL 2

Data rate: 20 Hz  
Type: back detector  
Save Data: On

THERMAL AUX 1

Use: Valve Box Heater  
Initial temp: 130 C (On)

VALVES

Valve 1 Gas Sampling  
Loop Volume: 0.250 mL

POST RUN

Post Time: 0.00 min



method: C:\GC\2014\BETTY\METHODS\GC142P133\_CAL.M  
Modified on: 5/5/2014 at 7:51:02 AM  
Load Time: 0.10 min  
Inject Time: 0.50 min  
Inlet: Front Inlet  
Valve 2 Gas Sampling  
Loop Volume: 0.250 mL  
Load Time: 0.10 min  
Inject Time: 0.50 min  
Inlet: Front Inlet

TIME TABLE

| Time(min) | Parameter & Setpoint     |     |
|-----------|--------------------------|-----|
| 3.00      | Front Detector Polarity: | Off |

=====

6890 GC METHOD

=====

OVEN

|                              |                              |
|------------------------------|------------------------------|
| Initial temp: 40 C (On)      | Maximum temp: 250 C          |
| Initial time: 3.00 min       | Equilibration time: 0.50 min |
| Ramps:                       |                              |
| # Rate Final temp Final time | CRYO (N2)                    |
| 1 0 (Off)                    | Cryo: Off                    |
| Post temp: 40 C              | Cryo fault: On               |
| Post time: 0.00 min          | Cryo timeout: 40.00 min (On) |
| Run time: 3.00 min           | Quick cryo cool: Off         |
|                              | Ambient temp: 30 C           |

FRONT INLET (SPLIT/SPLITLESS)

Mode: Splitless  
Initial temp: 200 C (On)  
Pressure: 60.0 psi (On)  
Purge flow: 0.0 mL/min  
Purge time: 0.00 min  
Total flow: 12.3 mL/min  
Gas saver: Off  
Gas type: Helium

BACK INLET (SPLIT/SPLITLESS)

Mode: Split  
Initial temp: 200 C (On)  
Pressure: 11.7 psi (On)  
Split ratio: 5:1  
Split flow: 12.3 mL/min  
Total flow: 17.6 mL/min  
Gas saver: Off  
Gas type: Helium

COLUMN 1

Packed Column  
Model Number: 19808  
Description: Rt-ShinCarbon 2m x 1mm I  
Max temperature: 250 C  
Mode: constant pressure  
Pressure: 60.0 psi  
Inlet: Front Inlet  
Outlet: Front Detector  
Outlet pressure: ambient

COLUMN 2

Capillary Column  
Model Number: 10198  
Description: Rtx-1 30m x 0.32mm x 4um  
Max temperature: 250 C  
Nominal length: 30.0 m  
Nominal diameter: 320.00 um  
Nominal film thickness: 4.00 um  
Mode: constant flow  
Initial flow: 2.5 mL/min  
Nominal init pressure: 11.7 psi  
Average velocity: 39 cm/sec  
Inlet: Back Inlet  
Outlet: (other)  
Outlet pressure: ambient

FRONT DETECTOR (TCD)

Temperature: 275 C (On)  
Reference flow: 20.0 mL/min (On)  
Mode: Constant makeup flow  
Makeup flow: 10.0 mL/min (On)  
Makeup Gas Type: Helium  
Filament: On  
Negative polarity: On

BACK DETECTOR (FID)

Temperature: 250 C (On)  
Hydrogen flow: 60.0 mL/min (On)  
Air flow: 450.0 mL/min (On)  
Mode: Constant makeup flow  
Makeup flow: 40.0 mL/min (On)  
Makeup Gas Type: Nitrogen  
Flame: On  
Electrometer: On  
Lit offset: 2.0

SIGNAL 1

Data rate: 20 Hz  
Type: front detector  
Save Data: On

SIGNAL 2

Data rate: 20 Hz  
Type: back detector  
Save Data: On

THERMAL AUX 1

Use: Valve Box Heater  
Initial temp: 130 C (On)

VALVES

Valve 1 Gas Sampling  
Loop Volume: 0.250 mL

POST RUN

Post Time: 0.00 min

method: C:\GC\2014\BETTY\METHODS\GC142P133\_SHORT.M  
Modified on: 2/17/2014 at 5:52:35 PM  
Load Time: 0.10 min  
Inject Time: 0.50 min  
Inlet: Front Inlet  
Valve 2 Gas Sampling  
Loop Volume: 0.250 mL  
Load Time: 0.10 min  
Inject Time: 0.50 min  
Inlet: Front Inlet

TIME TABLE

| Time(min) | Parameter & Setpoint |
|-----------|----------------------|
|-----------|----------------------|

**This Is The Last Page  
Of This Report.**

**APPENDIX I-E**  
**Calibration Gas Cylinder Certification Sheets**

# CERTIFICATE OF ANALYSIS

## Grade of Product: EPA Protocol

|                  |                                       |                     |                 |
|------------------|---------------------------------------|---------------------|-----------------|
| Part Number:     | E03NI79E15A0088                       | Reference Number:   | 122-401268406-1 |
| Cylinder Number: | EB0066823                             | Cylinder Volume:    | 151.0 CF        |
| Laboratory:      | 124 - Durham (SAP) - NC               | Cylinder Pressure:  | 2015 PSIG       |
| PGVP Number:     | B22018                                | Valve Outlet:       | 590             |
| Gas Code:        | CO <sub>2</sub> ,O <sub>2</sub> ,BALN | Certification Date: | Aug 06, 2018    |

**Expiration Date: Aug 06, 2026**

Certification performed in accordance with "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (May 2012)" document EPA 600/R-12/531, using the assay procedures listed. Analytical Methodology does not require correction for analytical interference. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a volume/volume basis unless otherwise noted.

Do Not Use This Cylinder below 100 psig, i.e. 0.7 megapascals.

### ANALYTICAL RESULTS

| Component      | Requested Concentration | Actual Concentration | Protocol Method | Total Relative Uncertainty | Assay Dates |
|----------------|-------------------------|----------------------|-----------------|----------------------------|-------------|
| CARBON DIOXIDE | 10.00 %                 | 9.952 %              | G1              | +/- 0.6% NIST Traceable    | 08/06/2018  |
| OXYGEN         | 11.00 %                 | 11.05 %              | G1              | +/- 0.4% NIST Traceable    | 08/06/2018  |
| NITROGEN       | Balance                 |                      |                 |                            |             |

### CALIBRATION STANDARDS

| Type | Lot ID   | Cylinder No | Concentration                    | Uncertainty | Expiration Date |
|------|----------|-------------|----------------------------------|-------------|-----------------|
| NTRM | 13060638 | CC414571    | 13.359 % CARBON DIOXIDE/NITROGEN | +/- 0.6%    | May 09, 2019    |
| NTRM | 09060212 | CC262381    | 9.961 % OXYGEN/NITROGEN          | +/- 0.3%    | Nov 08, 2018    |

### ANALYTICAL EQUIPMENT

| Instrument/Make/Model                    | Analytical Principle          | Last Multipoint Calibration |
|------------------------------------------|-------------------------------|-----------------------------|
| Horiba VIA510 CO <sub>2</sub> 2L6YXWY0   | Nondispersive Infrared (NDIR) | Jul 25, 2018                |
| Horiba MPA510 O <sub>2</sub> 41499150042 | Paramagnetic                  | Jul 25, 2018                |

Triad Data Available Upon Request



*CS Williams*

Approved for Release



# CERTIFICATE OF ANALYSIS

## Grade of Product: EPA Protocol

Part Number: E03NI59E15A0014  
Cylinder Number: EB0107294  
Laboratory: 124 - Durham (SAP) - NC  
PGVP Number: B22018

Reference Number: 122-401123521-1  
Cylinder Volume: 158.6 CF  
Cylinder Pressure: 2015 PSIG  
Valve Outlet: 590  
Certification Date: Feb 12, 2018

**Expiration Date: Feb 12, 2026**

Certification performed in accordance with "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (May 2012)" document EPA 600/R-12/531, using the assay procedures listed. Analytical Methodology does not require correction for analytical interference. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a volume/volume basis unless otherwise noted.

Do Not Use This Cylinder below 100 psig, i.e. 0.7 megapascals.

| ANALYTICAL RESULTS |                         |                      |                 |                            |             |
|--------------------|-------------------------|----------------------|-----------------|----------------------------|-------------|
| Component          | Requested Concentration | Actual Concentration | Protocol Method | Total Relative Uncertainty | Assay Dates |
| CARBON DIOXIDE     | 18.50 %                 | 18.22 %              | G1              | +/- 0.6% NIST Traceable    | 02/12/2018  |
| OXYGEN             | 22.00 %                 | 21.99 %              | G1              | +/- 0.3% NIST Traceable    | 02/12/2018  |
| NITROGEN           | Balance                 |                      |                 |                            |             |

| CALIBRATION STANDARDS |          |             |                                 |             |                 |
|-----------------------|----------|-------------|---------------------------------|-------------|-----------------|
| Type                  | Lot ID   | Cylinder No | Concentration                   | Uncertainty | Expiration Date |
| NTRM                  | 12061508 | CC354696    | 19.87 % CARBON DIOXIDE/NITROGEN | +/- 0.6%    | Jan 11, 2024    |
| NTRM                  | 12062009 | CC367498    | 22.883 % OXYGEN/NITROGEN        | +/- 0.2%    | Apr 24, 2018    |

| ANALYTICAL EQUIPMENT         |                               |                             |
|------------------------------|-------------------------------|-----------------------------|
| Instrument/Make/Model        | Analytical Principle          | Last Multipoint Calibration |
| Horiba VIA510 CO2 2L6YXWY0   | Nondispersive Infrared (NDIR) | Feb 07, 2018                |
| Horiba MPA510 O2 41499150042 | Paramagnetic                  | Feb 07, 2018                |

Triad Data Available Upon Request



*CS D. H. H. H.*

Approved for Release



Praxair Distribution Mid-Atlantic  
One Steel Road East,  
Morrisville, PA 19067  
Tel: (800) 638-6360 Fax: (215) 736 5240  
PGVP ID: F32017

DocNumber: 000021313

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

### Customer & Order Information:

CHEROKEE INSTRUMENTS INC  
100 LOGAN COURT  
ANGIER NC 27501

Praxair Order Number: 92286180  
Customer P. O. Number: 0050001228  
Customer Reference Number:

Fill Date: 6/10/2017  
Part Number: NI CO225E-AS  
Lot Number: 304613161708  
Cylinder Style & Outlet: AS CGA 660  
Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

### Certified Concentration:

|                  |                 |                         |
|------------------|-----------------|-------------------------|
| Expiration Date: | 6/14/2025       | NIST Traceable          |
| Cylinder Number: | CC120837        | Analytical Uncertainty: |
| 226.4 ppm        | CARBON MONOXIDE | ± 0.5 %                 |
| Balance          | NITROGEN        |                         |

Certification Information: Certification Date: 6/14/2017 Term: 96 Months Expiration Date: 6/14/2025

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Do Not Use this Standard if Pressure is less than 100 PSIG.

### Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

#### 1. Component: CARBON MONOXIDE

Requested Concentration: 225 ppm  
Certified Concentration: 226.4 ppm  
Instrument Used: HORIBA VIA-3000 S/N Y9EY78L6  
Analytical Method: NDIR  
Last Multipoint Calibration: 5/31/2017

| First Analysis Data: |       | Date:            |       | 6/14/2017 |           |
|----------------------|-------|------------------|-------|-----------|-----------|
| Z:                   | 0     | R:               | 303   | C:        | 226.3     |
| Conc:                |       |                  |       |           | 226.5     |
| R:                   | 302.6 | Z:               | 0     | C:        | 226.2     |
| Conc:                |       |                  |       |           | 226.4     |
| Z:                   | 0     | C:               | 226.2 | R:        | 302.6     |
| Conc:                |       |                  |       |           | 226.4     |
| UOM:                 | PPM   | Mean Test Assay: |       |           | 226.4 PPM |

Analyzed by:

Megha Patel

Reference Standard Type: GMIS  
Ref Std. Cylinder #: CC308682  
Ref Std. Conc: 303 PPM  
Ref Std. Traceable to SRM #: 1680b  
SRM Sample #: 2-J-49  
SRM Cylinder #: CAL018038

| Second Analysis Data: |     | Date:            |   |    |       |
|-----------------------|-----|------------------|---|----|-------|
| Z:                    | 0   | R:               | 0 | C: | 0     |
| Conc:                 |     |                  |   |    | 0     |
| R:                    | 0   | Z:               | 0 | C: | 0     |
| Conc:                 |     |                  |   |    | 0     |
| Z:                    | 0   | C:               | 0 | R: | 0     |
| Conc:                 |     |                  |   |    | 0     |
| UOM:                  | PPM | Mean Test Assay: |   |    | 0 PPM |

Certified by:

Jessica Goodman

Information contained herein has been prepared at your request by qualified experts within Praxair Distribution, Inc. While we believe that the information is accurate within the limits of the analytical methods employed and is complete to the extent of the specific analyses performed, we make no warranty or representation as to the suitability of the use of the information for any purpose. The information is offered with the understanding that any use of the information is at the sole discretion and risk of the user. In no event shall the liability of Praxair Distribution, Inc., arising out of the use of the information contained herein exceed the fee established for providing such information.





Praxair Distribution Mid-Atlantic  
One Steel Road East,  
Morrisville, PA 19067  
Tel: (800) 638-6360 Fax: (215) 736 5240  
PGVP ID: F32016

DocNumber: 000019323

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

### Customer & Order Information:

CHEROKEE INSTRUMENTS INC  
100 LOGAN COURT  
ANGIER NC 27501

Praxair Order Number: 86501794  
Customer P. O. Number: 14848  
Customer Reference Number:

Fill Date: 12/16/2016  
Part Number: NI CO450E-AS  
Lot Number: 304513351805  
Cylinder Style & Outlet: AS CGA 350  
Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

### Certified Concentration:

|                  |                 |                         |
|------------------|-----------------|-------------------------|
| Expiration Date: | 12/21/2024      | NIST Traceable          |
| Cylinder Number: | CC109287        | Analytical Uncertainty: |
| 450 ppm          | CARBON MONOXIDE | ± 0.7 %                 |
| Balance          | NITROGEN        |                         |

Certification Information: Certification Date: 12/21/2016 Term: 96 Months Expiration Date: 12/21/2024

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Do Not Use this Standard if Pressure is less than 100 PSIG.

### Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

#### 1. Component: CARBON MONOXIDE

Requested Concentration: 450 ppm  
Certified Concentration: 450 ppm  
Instrument Used: HORIBA VIA-3000 S/N Y9EY78L6  
Analytical Method: NDIR  
Last Multipoint Calibration: 12/7/2016

|                              |                  |            |
|------------------------------|------------------|------------|
| First Analysis Data:         | Date:            | 12/21/2016 |
| Z: 0 R: 398 C: 451 Conc: 451 |                  |            |
| R: 398 Z: 0 C: 450 Conc: 450 |                  |            |
| Z: 0 C: 450 R: 398 Conc: 450 |                  |            |
| UOM: PPM                     | Mean Test Assay: | 450 PPM    |

Analyzed by:

Jessica Goodman

Reference Standard Type: GMIS  
Ref. Std. Cylinder #: CC118336  
Ref. Std. Conc: 398 PPM  
Ref. Std. Traceable to SRM #: 1690b  
SRM Sample #: 2-J-49  
SRM Cylinder #: CAL018038

|                        |                  |       |
|------------------------|------------------|-------|
| Second Analysis Data:  | Date:            |       |
| Z: 0 R: 0 C: 0 Conc: 0 |                  |       |
| R: 0 Z: 0 C: 0 Conc: 0 |                  |       |
| Z: 0 C: 0 R: 0 Conc: 0 |                  |       |
| UOM: PPM               | Mean Test Assay: | 0 PPM |

Certified by:

Megha Patel

# CERTIFICATE OF ANALYSIS

## Grade of Product: EPA Protocol

|                  |                         |                     |                 |
|------------------|-------------------------|---------------------|-----------------|
| Part Number:     | E02NI99E15A0930         | Reference Number:   | 122-401180045-1 |
| Cylinder Number: | CC57597                 | Cylinder Volume:    | 144.4 CF        |
| Laboratory:      | 124 - Durham (SAP) - NC | Cylinder Pressure:  | 2015 PSIG       |
| PGVP Number:     | B22018                  | Valve Outlet:       | 350             |
| Gas Code:        | PPN,BALN                | Certification Date: | Apr 17, 2018    |

Expiration Date: Apr 17, 2026

Certification performed in accordance with "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (May 2012)" document EPA 800/PF-12/531, using the assay procedures listed. Analytical Methodology does not require correction for analytical interferences. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a volume/volume basis unless otherwise noted.

Do Not Use This Cylinder below 100 psig, i.e. 0.7 megapascals

### ANALYTICAL RESULTS

| Component | Requested Concentration | Actual Concentration | Protocol Method | Total Relative Uncertainty | Assay Dates |
|-----------|-------------------------|----------------------|-----------------|----------------------------|-------------|
| PROPANE   | 30.00 PPM               | 30.07 PPM            | G1              | +/- 0.7% NIST Traceable    | 04/17/2018  |
| NITROGEN  | Balance                 |                      |                 |                            |             |

### CALIBRATION STANDARDS

| Type | Lot ID  | Cylinder No | Concentration        | Uncertainty | Expiration Date |
|------|---------|-------------|----------------------|-------------|-----------------|
| NTRM | 0010613 | AAL18527    | 49.8 PPM PROPANE/AIR | +/- 0.8%    | May 23, 2018    |

### ANALYTICAL EQUIPMENT

| Instrument/Make/Model        | Analytical Principle | Last Multipoint Calibration |
|------------------------------|----------------------|-----------------------------|
| Nicolet 6700 AHR0801333 C3H8 | FTIR                 | Mar 22, 2018                |

Triad Data Available Upon Request



*[Signature]*

Approved for Release



# **CERTIFICATE OF ANALYSIS**

## **Grade of Product: EPA Protocol**

|                  |                         |                     |                 |
|------------------|-------------------------|---------------------|-----------------|
| Part Number:     | E02NI99E15A0931         | Reference Number:   | 122-401180046-1 |
| Cylinder Number: | CC354004                | Cylinder Volume:    | 144.4 CF        |
| Laboratory:      | 124 - Durham (SAP) - NC | Cylinder Pressure:  | 2015 PSIG       |
| PGVP Number:     | B22018                  | Valve Outlet:       | 350             |
| Gas Code:        | PPN,BALN                | Certification Date: | Apr 17, 2018    |

**Expiration Date: Apr 17, 2026**

Certification performed in accordance with "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (May 2012)" document EPA 600/R-12/031, using the assay procedures listed. Analytical Methodology does not require correction for analytical interference. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a volume/volume basis unless otherwise noted.

Do Not Use This Cylinder below 100 psig, (≈ 0.7 megapascals).

| ANALYTICAL RESULTS |                         |                      |                 |                            |             |
|--------------------|-------------------------|----------------------|-----------------|----------------------------|-------------|
| Component          | Requested Concentration | Actual Concentration | Protocol Method | Total Relative Uncertainty | Assay Dates |
| PROPANE            | 50.00 PPM               | 52.38 PPM            | G1              | +/- 0.6% NIST Traceable    | 04/17/2018  |
| NITROGEN           | Balance                 |                      |                 |                            |             |

| CALIBRATION STANDARDS |         |             |                      |             |                 |
|-----------------------|---------|-------------|----------------------|-------------|-----------------|
| Type                  | Lot ID  | Cylinder No | Concentration        | Uncertainty | Expiration Date |
| NTRM                  | 0010613 | AAL18527    | 49.8 PPM PROPANE/AIR | +/- 0.6%    | May 23, 2018    |

| ANALYTICAL EQUIPMENT         |                      |                             |
|------------------------------|----------------------|-----------------------------|
| Instrument/Make/Model        | Analytical Principle | Last Multipoint Calibration |
| Nicolet 6700 AHR0801333 C3H8 | FTIR                 | Mar 22, 2018                |

Triad Data Available Upon Request



*Phil St...*  
Approved for Release

DocNumber: 000024404

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

**Customer & Order Information:**

CHEROKEE INSTRUMENTS INC  
100 LOGAN COURT  
ANGIER NC 27501

Praxair Order Number: 56678698  
Customer P. O. Number: 0050001578  
Customer Reference Number:

Fill Date: 3/14/2018  
Part Number: NI NO47.5ME-AS  
Lot Number: 30461307802  
Cylinder Style & Outlet: AS CGA 660  
Cylinder Pressure & Volume: 2000 psig 140 cu ft

**Certified Concentration:**

|                  |              |                         |
|------------------|--------------|-------------------------|
| Expiration Date: | 3/26/2021    | NIST Traceable          |
| Cylinder Number: | CC362567     | Analytical Uncertainty: |
| 48.0 ppm         | NITRIC OXIDE | ± 0.9 %                 |
| Balance          | NITROGEN     |                         |

NOx = 48.0 ppm

NOx for Reference Only

**Certification Information:** Certification Date: 3/26/2018 Term: 36 Months Expiration Date: 3/26/2021

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-800/R-12/531, using Procedure G1. Do Not Use this Standard if Pressure is less than 100 PSIG.

**Analytical Data:**

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

**1. Component: NITRIC OXIDE**

Requested Concentration: 47.5 ppm  
Certified Concentration: 48.0 ppm  
Instrument Used: MKS 2031  
Analytical Method: FTIR  
Last Multipoint Calibration: 3/15/2018

|                      |                  |         |            |
|----------------------|------------------|---------|------------|
| First Analysis Data: |                  | Date:   | 3/19/2018  |
| Z: 0.123             | R: 49.7          | C: 47.1 | Conc: 47.7 |
| R: 49.5              | Z: 0.014         | C: 47   | Conc: 47.6 |
| Z: 0.014             | C: 47.2          | R: 49.7 | Conc: 47.8 |
| UOM: PPM             | Mean Test Assay: |         | 47.7 PPM   |

Analyzed by:

Remzy Jermal

Reference Standard Type: GM15  
Ref. Std. Cylinder #: SA4389  
Ref. Std. Conc: 50.3 PPM  
Ref. Std. Traceable to SRM #: 1663B  
SRM Sample #: 45-V-05  
SRM Cylinder #: CAL017971

|                       |                  |         |            |
|-----------------------|------------------|---------|------------|
| Second Analysis Data: |                  | Date:   | 3/26/2018  |
| Z: 0.023              | R: 49.5          | C: 47.7 | Conc: 48.3 |
| R: 49.6               | Z: 0.068         | C: 47.6 | Conc: 48.2 |
| Z: 0.063              | C: 47.6          | R: 49.6 | Conc: 48.2 |
| UOM: PPM              | Mean Test Assay: |         | 48.3 PPM   |

Certified by:

Megha Patel





Praxair Distribution Mid-Atlantic  
One Steel Road East,  
Morrisville, PA 19067  
Tel: (800) 638-6360 Fax: (215) 736 5240  
PGVP ID: F32017

DocNumber: 000021376

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

### Customer & Order Information:

CHEROKEE INSTRUMENTS INC  
100 LOGAN COURT  
ANGIER NC 27501

Praxair Order Number: 92286180  
Customer P. O. Number: 0050001228  
Customer Reference Number:

Fill Date: 6/10/2017  
Part Number: NI NO90ME-A5  
Lot Number: 304513161704  
Cylinder Style & Outlet: AS CGA 680  
Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

### Certified Concentration:

|                  |              |                         |
|------------------|--------------|-------------------------|
| Expiration Date: | 6/21/2025    | NIST Traceable          |
| Cylinder Number: | CC200174     | Analytical Uncertainty: |
| 89.5 ppm         | NITRIC OXIDE | ± 0.5 %                 |
| Balance          | NITROGEN     |                         |

NOx = 90.0 ppm

NOx for Reference Only

Certification Information: Certification Date: 6/21/2017 Term: 96 Months Expiration Date: 6/21/2025

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Do Not Use this Standard if Pressure is less than 100 PSIG.

### Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

#### 1. Component: NITRIC OXIDE

Requested Concentration: 90 ppm  
Certified Concentration: 89.5 ppm  
Instrument Used: TECO MODEL 42i S/N: 0820017513  
Analytical Method: CHEMILUMINESCENCE  
Last Multipoint Calibration: 6/13/2017

|                               |                  |           |
|-------------------------------|------------------|-----------|
| First Analysis Date:          | Date:            | 6/14/2017 |
| Z: 0 R: 95 C: 89.5 Conc: 89.5 |                  |           |
| R: 85 Z: 0 C: 89.4 Conc: 89.4 |                  |           |
| Z: 0 C: 89.4 R: 95 Conc: 89.4 |                  |           |
| UOM: PPM                      | Mean Test Assay: | 89.4 PPM  |

Reference Standard Type: GMS  
Ref. Std. Cylinder #: CC352709  
Ref. Std. Conc: 95.0 PPM  
Ref. Std. Traceable to SRM #: 16848  
SRM Sample #: 44-T-48  
SRM Cylinder #: FF9239

|                               |                  |           |
|-------------------------------|------------------|-----------|
| Second Analysis Date:         | Date:            | 6/21/2017 |
| Z: 0 R: 95 C: 90 Conc: 89.7   |                  |           |
| R: 85.4 Z: 0 C: 80 Conc: 89.7 |                  |           |
| Z: 0 C: 90 R: 95.4 Conc: 89.7 |                  |           |
| UOM: PPM                      | Mean Test Assay: | 89.7 PPM  |

Analyzed by:

Jessica Goodman

Certified by:

Megha Patel

Information contained herein has been prepared at your request by qualified experts within Praxair Distribution, Inc. While we believe that the information is accurate within the limits of the analytical methods employed and is complete to the extent of the specific analyses performed, we make no warranty or representation as to the suitability of the use of the information for any purpose. The information is offered with the understanding that any use of the information is at the sole discretion and risk of the user. In no event shall the liability of Praxair Distribution, Inc., arising out of the use of the information contained herein exceed the fee established for providing such information.

**APPENDIX I-F**  
**Sampling Equipment Calibration Sheets**

**Type S Pitot Tube Inspection and  
Stack Thermocouple Calibration**

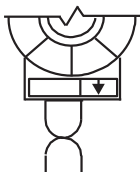
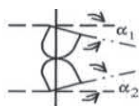
**GENERAL INFORMATION**

Probe ID **3A**  
Date **7/13/2018**

Personnel **JBG**  
Coefficient Value **0.84**

**PITOT TUBE INSPECTION**

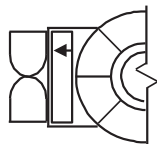
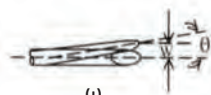
Pitot Tube assembly level? (yes/no) **yes**  
Pitot Tube obstruction? (yes/no) **no**  
Pitot Tube openings damaged? (yes/no) **no**



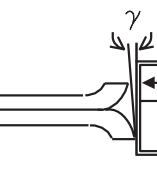
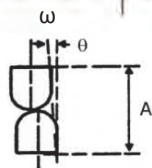
$\alpha_1$  **1**  $\leq \pm 10^\circ$   
 $\alpha_2$  **1**  $\leq \pm 10^\circ$



$\beta_1$  **-2**  $\leq \pm 5^\circ$   
 $\beta_2$  **2**  $\leq \pm 5^\circ$



$\gamma$  **0.017453293** radians  
 $\theta$  **0.052359878** radians



$z = A \tan(\gamma)$  **0**  $\leq \pm \frac{1}{8}"$   
 $\omega = A \tan(\theta)$  **0.0469**  $\leq \pm \frac{1}{32}"$

$D_t$  **0.375**  
( $\frac{3}{16}" < D_t < \frac{3}{8}"$  Recommended)

$A$  **0.895**

$P_A$   
 $P_B$  **1.19**  
( $1.05 < P/D_t < 1.50$  Recommended)

**STACK THERMOCOUPLE CALIBRATION**

Ref. Type

**Hg Thermometer**

Ref. ID

**Hg-1**

| Source                       | Ref., °F | Stack TC, °F | Abs. Diff., °F |
|------------------------------|----------|--------------|----------------|
| Ice bath                     | 32.2     | 34           | 1.8            |
| Ambient                      | 78       | 79           | 1              |
| Hot Plate                    | 211.2    | 212          | 0.8            |
| Maximum Temp. Difference, °F |          |              | <b>1.8</b>     |

## Type S Pitot Tube Inspection and Stack Thermocouple Calibration

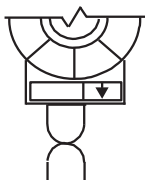
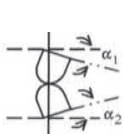
### GENERAL INFORMATION

Probe ID 4B  
Date 4/30/2018

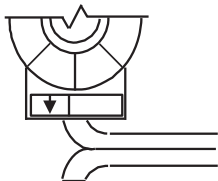
Personnel JBG  
Coefficient Value 0.84

### PITOT TUBE INSPECTION

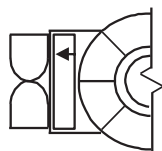
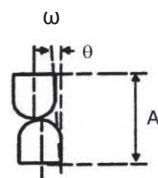
Pitot Tube assembly level? (yes/no) yes  
Pitot Tube obstruction? (yes/no) no  
Pitot Tube openings damaged? (yes/no) no



$\alpha_1$  1  $\leq \pm 10^\circ$   
 $\alpha_2$  0  $\leq \pm 10^\circ$



$\beta_1$  2  $\leq \pm 5^\circ$   
 $\beta_2$  1  $\leq \pm 5^\circ$



$\gamma$  0  
 $\theta$  1

$z = A \tan(\gamma)$  0.00  $\leq \pm \frac{1}{8}"$   
 $\omega = A \tan(\theta)$  0.016582312  $\leq \pm \frac{1}{32}"$

$D_t$  0.375  
( $\frac{3}{16}" < D_t < \frac{3}{8}"$  Recommended)

$A$  0.95

$P_A$  1.27  
 $P_B$   
( $1.05 < P/D_t < 1.50$  Recommended)

### STACK THERMOCOUPLE CALIBRATION

Ref. Type Hg Thermometer

Ref. ID Hg-1

| Source    | Ref., °F | Stack TC, °F | Abs. Diff., °F |
|-----------|----------|--------------|----------------|
| Ice bath  | 32       | 32           | 0              |
| Ambient   | 67       | 67           | 0              |
| Hot Plate | 232      | 232          | 0              |

Maximum Temp. Difference, °F 0



**Type S Pitot Tube Inspection and  
Stack Thermocouple Calibration**

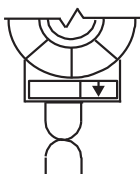
**GENERAL INFORMATION**

Probe ID   
Date

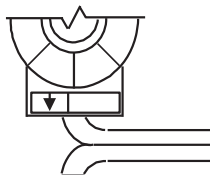
Personnel   
Coefficient Value

**PITOT TUBE INSPECTION**

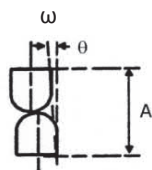
Pitot Tube assembly level? (yes/no)   
Pitot Tube obstruction? (yes/no)   
Pitot Tube openings damaged? (yes/no)



$\alpha_1$    $\leq \pm 10^\circ$   
 $\alpha_2$    $\leq \pm 10^\circ$



$\beta_1$    $\leq \pm 5^\circ$   
 $\beta_2$    $\leq \pm 5^\circ$



$\gamma$   radians  
 $\theta$   radians

$z = A \tan(\gamma)$    $\leq \pm \frac{1}{8}"$   
 $\omega = A \tan(\theta)$    $\leq \pm \frac{1}{32}"$

$D_t$    
( $\frac{3}{16}" < D_t < \frac{3}{8}"$  Recommended)

$A$

$P_A$    
 $P_B$    
( $1.05 < P/D_t < 1.50$  Recommended)

**STACK THERMOCOUPLE CALIBRATION**

Ref. Type

Ref. ID

| Source                       | Ref., °F | Stack TC, °F | Abs. Diff., °F                   |
|------------------------------|----------|--------------|----------------------------------|
| Ice bath                     | 32.1     | 32.8         | 0.7                              |
| Ambient                      | 78       | 78           | 0                                |
| Hot Plate                    | 211.4    | 213.2        | 1.8                              |
| Maximum Temp. Difference, °F |          |              | <input type="text" value="1.8"/> |

## Type S Pitot Tube Inspection and Stack Thermocouple Calibration

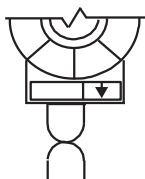
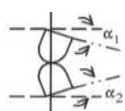
### GENERAL INFORMATION

Probe ID 4A  
Date 4/30/2018

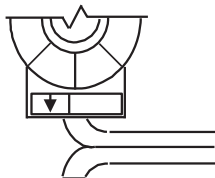
Personnel JBG  
Coefficient Value 0.84

### PITOT TUBE INSPECTION

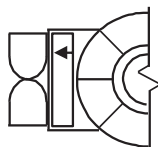
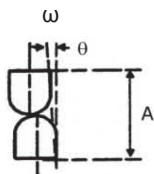
Pitot Tube assembly level? (yes/no) yes  
Pitot Tube obstruction? (yes/no) no  
Pitot Tube openings damaged? (yes/no) no



$\alpha_1$  0  $\leq \pm 10^\circ$   
 $\alpha_2$  2  $\leq \pm 10^\circ$

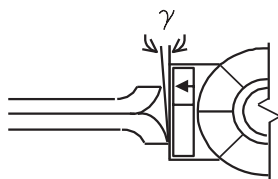
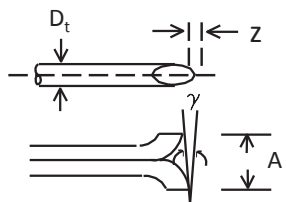


$\beta_1$  -1  $\leq \pm 5^\circ$   
 $\beta_2$  0  $\leq \pm 5^\circ$



$\gamma$  0.0000  
 $\theta$  0.0524  
 $z = A \tan(\gamma)$  0.0000  $\leq \pm \frac{1}{8}"$   
 $\omega = A \tan(\theta)$  0.0472  $\leq \pm \frac{1}{32}"$

$D_t$  0.375  
( $\frac{3}{16}" < D_t < \frac{3}{8}"$  Recommended)



A 0.9  
 $P_A$  1.2  
 $P_B$  1.2  
( $1.05 < P/D_t < 1.50$  Recommended)

### STACK THERMOCOUPLE CALIBRATION

Ref. Type Hg Thermometer

Ref. ID Hg-1

| Source                       | Ref., °F | Stack TC, °F | Abs. Diff., °F |
|------------------------------|----------|--------------|----------------|
| Ice bath                     | 32       | 32           | 0              |
| Ambient                      | 67       | 67           | 0              |
| Hot Plate                    | 232      | 231          | 1              |
| Maximum Temp. Difference, °F |          |              | 1              |

***Stainless Steel Nozzle Calibration and Condition  
Air Control Techniques, P.C.***

| Nozzle Set ID | Nozzle ID | Average | Measurements |       |       | High-Low | Condition | Date Inspected |
|---------------|-----------|---------|--------------|-------|-------|----------|-----------|----------------|
|               |           |         | 1            | 2     | 3     |          |           |                |
| ACT-N-1       | 1-1       | 0.124   | 0.125        | 0.124 | 0.124 | 0.001    | OK        | 12/11/17       |
| ACT-N-1       | 1-2       | 0.180   | 0.180        | 0.180 | 0.181 | 0.001    | OK        | 12/11/17       |
| ACT-N-1       | 1-3       | 0.245   | 0.245        | 0.245 | 0.244 | 0.001    | OK        | 12/11/17       |
| ACT-N-1       | 1-4       | 0.302   | 0.303        | 0.301 | 0.301 | 0.002    | OK        | 12/11/17       |
| ACT-N-1       | 1-5       | 0.368   | 0.367        | 0.365 | 0.366 | 0.002    | OK        | 12/11/17       |
| ACT-N-1       | 1-6       | 0.428   | 0.428        | 0.428 | 0.428 | 0.000    | OK        | 12/11/17       |
| ACT-N-1       | 1-7       | 0.492   | 0.492        | 0.492 | 0.492 | 0.000    | OK        | 12/11/17       |

| Nozzle Set ID | Nozzle ID | Average | Measurements |       |       | High-Low | Condition | Date     |
|---------------|-----------|---------|--------------|-------|-------|----------|-----------|----------|
|               |           |         | 1            | 2     | 3     |          |           |          |
| ACT-N-2       | 2-1       | 0.126   | 0.127        | 0.125 | 0.127 | 0.002    | OK        | 12/11/17 |
| ACT-N-2       | 2-2       | 0.176   | 0.176        | 0.176 | 0.175 | 0.001    | OK        | 12/11/17 |
| ACT-N-2       | 2-3       | 0.238   | 0.239        | 0.237 | 0.239 | 0.002    | OK        | 12/11/17 |
| ACT-N-2       | 2-4       | 0.286   | 0.286        | 0.286 | 0.284 | 0.002    | OK        | 12/11/17 |
| ACT-N-2       | 2-5       | 0.377   | 0.377        | 0.377 | 0.376 | 0.001    | OK        | 12/11/17 |
| ACT-N-2       | 2-6       | 0.456   | 0.455        | 0.455 | 0.457 | 0.002    | OK        | 12/11/17 |
| ACT-N-2       | 2-7       | 0.497   | 0.498        | 0.497 | 0.497 | 0.001    | OK        | 12/11/17 |

| Nozzle Set ID | Nozzle ID | Average | Measurements |       |       | High-Low | Condition | Date     |
|---------------|-----------|---------|--------------|-------|-------|----------|-----------|----------|
|               |           |         | 1            | 2     | 3     |          |           |          |
| ACT-N-3       | 3-1       | 0.118   | 0.118        | 0.119 | 0.117 | 0.002    | OK        | 12/11/17 |
| ACT-N-3       | 3-2       | 0.190   | 0.189        | 0.190 | 0.190 | 0.001    | OK        | 9/8/16   |
| ACT-N-3       | 3-3       | 0.239   | 0.238        | 0.238 | 0.240 | 0.002    | OK        | 12/11/17 |
| ACT-N-3       | 3-4       | 0.254   | 0.254        | 0.254 | 0.255 | 0.001    | OK        | 9/8/16   |
| ACT-N-3       | 3-5       | 0.377   | 0.377        | 0.377 | 0.376 | 0.001    | OK        | 12/11/17 |
| ACT-N-3       | 3-8       | 0.996   | 0.997        | 0.997 | 0.999 | 0.002    | OK        | 12/11/17 |
| ACT-N-3       | 3-7       | 0.496   | 0.495        | 0.495 | 0.497 | 0.002    | OK        | 12/11/17 |

| Nozzle Set ID | Nozzle ID | Average | Measurements |       |       | High-Low | Condition | Date     |
|---------------|-----------|---------|--------------|-------|-------|----------|-----------|----------|
|               |           |         | 1            | 2     | 3     |          |           |          |
| ACT-N-4       | 4-1       | 0.303   | 0.304        | 0.302 | 0.302 | 0.002    | OK        | 12/11/17 |
| ACT-N-4       | 4-2       | 0.178   | 0.178        | 0.178 | 0.177 | 0.001    | OK        | 9/8/16   |
| ACT-N-4       | 4-3       | 0.302   | 0.303        | 0.301 | 0.301 | 0.002    | OK        | 12/11/17 |
| ACT-N-4       | 4-4       | 0.247   | 0.247        | 0.247 | 0.247 | 0.000    | OK        | 12/11/17 |
| ACT-N-4       | 4-5       | 0.370   | 0.371        | 0.369 | 0.369 | 0.002    | OK        | 12/11/17 |
| ACT-N-4       | 4-6       | 0.498   | 0.498        | 0.498 | 0.498 | 0.000    | OK        | 12/11/17 |
| ACT-N-4       | 4-7       | 0.501   | 0.500        | 0.500 | 0.502 | 0.002    | OK        | 12/11/17 |

Name Jonas Gilbert

Signature 12/11/2017

**APEX INSTRUMENTS METHOD 5 PRE-TEST CONSOLE CALIBRATION**  
**USING CALIBRATED CRITICAL ORIFICES**  
**5-POINT ENGLISH UNITS**

| Meter Console Information |        |
|---------------------------|--------|
| Console Model Number      | 522    |
| Console Serial Number     | 909033 |
| DGM Model Number          | RW 110 |
| DGM Serial Number         | 972787 |

| Calibration Conditions                   |             |          |      |
|------------------------------------------|-------------|----------|------|
| Date                                     | Time        | 11/06/18 | 9:00 |
| Barometric Pressure                      | 30.14 in Hg |          |      |
| Theoretical Critical Vacuum <sup>1</sup> | 14.23 in Hg |          |      |
| Calibration Technician                   | JBG         |          |      |

| Factors/Conversions |        |          |
|---------------------|--------|----------|
| Std Temp            | 528    | °R       |
| Std Press           | 29.92  | in Hg    |
| K <sub>1</sub>      | 17.647 | oR/in Hg |

<sup>1</sup>For valid test results, the Actual Vacuum should be 1 to 2 in. Hg greater than the Theoretical Critical Vacuum shown above.

<sup>2</sup>The Critical Orifice Coefficient, K', must be entered in English units, (ft<sup>3</sup>•R<sup>1/2</sup>)/(in.Hg•min).

| Calibration Data |                     |                   |                   |                        |                      |                  |                        |                     |                     |                  |
|------------------|---------------------|-------------------|-------------------|------------------------|----------------------|------------------|------------------------|---------------------|---------------------|------------------|
| Run Time         | Metering Console    |                   |                   |                        | Critical Orifice     |                  |                        |                     |                     |                  |
| Elapsed          | DGM Orifice<br>ΔH   | Volume<br>Initial | Volume<br>Final   | Outlet Temp<br>Initial | Outlet Temp<br>Final | Serial<br>Number | Coefficient            | Amb Temp<br>Initial | Amb Temp<br>Final   | Actual<br>Vacuum |
| (θ)              | (P <sub>m</sub> )   | (V <sub>m</sub> ) | (V <sub>m</sub> ) | (t <sub>m</sub> )      | (t <sub>m</sub> )    |                  | K'                     | (t <sub>amb</sub> ) | (t <sub>amb</sub> ) |                  |
| min              | in H <sub>2</sub> O | cubic feet        | cubic feet        | °F                     | °F                   |                  | see above <sup>2</sup> | °F                  | °F                  | in Hg            |
| 15.85            | 0.33                | 840.100           | 845.100           | 66                     | 67                   | FO 40            | 0.2380                 | 69                  | 69                  | 23.5             |
| 10.86            | 0.69                | 845.200           | 850.200           | 67                     | 68                   | FO 48            | 0.3488                 | 69                  | 71                  | 22.5             |
| 8.22             | 1.20                | 850.202           | 855.300           | 68                     | 69                   | FO 55            | 0.4594                 | 71                  | 71                  | 22.5             |
| 6.40             | 2.00                | 855.300           | 860.302           | 69                     | 69                   | FO 63            | 0.5906                 | 71                  | 71                  | 19.5             |
| 4.68             | 3.60                | 860.302           | 865.303           | 69                     | 70                   | FO 73            | 0.8063                 | 71                  | 71                  | 19.0             |

| Standardized Data      |                        |                        |                        | Results            |           |                              |                     |             |
|------------------------|------------------------|------------------------|------------------------|--------------------|-----------|------------------------------|---------------------|-------------|
| Dry Gas Meter          |                        | Critical Orifice       |                        | Calibration Factor |           | Dry Gas Meter                |                     | ΔH @        |
|                        |                        |                        |                        | Value              | Variation | Flowrate                     | Flowrate            |             |
| (V <sub>m(Std)</sub> ) | (Q <sub>m(Std)</sub> ) | (V <sub>C(Std)</sub> ) | (Q <sub>C(Std)</sub> ) | (Y)                | (ΔY)      | Std & Corr                   | 0.75 SCFM           | Variation   |
| cubic feet             | cfm                    | cubic feet             | cfm                    |                    |           | (Q <sub>m(Std)(corr)</sub> ) | (ΔH@)               | (ΔΔH@)      |
|                        |                        |                        |                        |                    |           | cfm                          | in H <sub>2</sub> O |             |
| 5.055                  | 0.319                  | 4.943                  | 0.312                  | 0.9779             | 0.003     | 0.312                        | 1.932               | 0.035       |
| 5.050                  | 0.465                  | 4.959                  | 0.457                  | 0.9820             | 0.008     | 0.457                        | 1.885               | -0.013      |
| 5.146                  | 0.626                  | 4.939                  | 0.601                  | 0.9599             | -0.015    | 0.601                        | 1.894               | -0.004      |
| 5.054                  | 0.790                  | 4.944                  | 0.772                  | 0.9783             | 0.004     | 0.772                        | 1.916               | 0.018       |
| 5.068                  | 1.083                  | 4.936                  | 1.055                  | 0.9739             | 0.000     | 1.055                        | 1.863               | -0.035      |
|                        |                        |                        |                        | 0.9744             | Y Average |                              | 1.898               | ΔH@ Average |

Note: For Calibration Factor Y, the ratio of the reading of the calibration meter to the dry gas meter, acceptable tolerance of individual values from the average is +/-0.02.

I certify that the above Dry Gas Meter was calibrated in accordance with USEPA Methods, CFR Title 40, Part 60, Appendix A-3, Method 5, 16.2.3

Signature: Jonas Gilbert

Date: 11/6/18

**METHOD 5 POST-TEST CONSOLE CALIBRATION USING CALIBRATED CRITICAL ORIFICES**  
**3-POINT ENGLISH UNITS**

| Meter Console Information |        |
|---------------------------|--------|
| Console Model Number      | 522    |
| Console Serial Number     | 909033 |
| DGM Model Number          | RW 110 |
| DGM Serial Number         | 328893 |

| Calibration Conditions                   |      |          |       |
|------------------------------------------|------|----------|-------|
| Date                                     | Time | 01/04/19 | 8:30  |
| Barometric Pressure                      |      | 30.1     | in Hg |
| Theoretical Critical Vacuum <sup>1</sup> |      | 14.2     | in Hg |
| Calibration Technician                   |      | JBG      |       |

| Factors/Conversions |        |          |
|---------------------|--------|----------|
| Std Temp            | 528    | °R       |
| Std Press           | 29.92  | in Hg    |
| K <sub>1</sub>      | 17.647 | oR/in Hg |

<sup>1</sup>For valid test results, the Actual Vacuum should be 1 to 2 in. Hg greater than the Theoretical Critical Vacuum shown above.

<sup>2</sup>The Critical Orifice Coefficient, 'K', must be entered in English units, (ft<sup>3</sup>•oR<sup>1/2</sup>)/(in.Hg•min).

| Calibration Data |                     |                   |                     |                        |                      |                  |             |                     |                     |                  |
|------------------|---------------------|-------------------|---------------------|------------------------|----------------------|------------------|-------------|---------------------|---------------------|------------------|
| Run Time         | Metering Console    |                   |                     |                        | Critical Orifice     |                  |             |                     |                     |                  |
| Elapsed          | DGM Orifice<br>ΔH   | Volume<br>Initial | Volume<br>Final     | Outlet Temp<br>Initial | Outlet Temp<br>Final | Serial<br>Number | Coefficient | Amb Temp<br>Initial | Amb Temp<br>Final   | Actual<br>Vacuum |
| (θ)              | (P <sub>m</sub> )   | (V <sub>m</sub> ) | (V <sub>net</sub> ) | (t <sub>m</sub> )      | (t <sub>net</sub> )  |                  | K'          | (t <sub>amb</sub> ) | (t <sub>amb</sub> ) | in. Hg           |
| min              | in H <sub>2</sub> O | cubic feet        | cubic feet          | °F                     | °F                   | FO               |             | °F                  | °F                  |                  |
| 10.0             | 2.00                | 590.50            | 598.146             | 48                     | 51                   | FO-63            | 0.5906      | 68                  | 68                  | 15.50            |
| 10.0             | 2.00                | 598.146           | 605.833             | 51                     | 55                   | FO-63            | 0.5906      | 68                  | 68                  | 15.50            |
| 10.0             | 2.00                | 605.833           | 613.549             | 55                     | 59                   | FO-63            | 0.5906      | 68                  | 68                  | 15.50            |

| Standardized Data      |                         |                              |                         | Results            |           |                              |                     |             |
|------------------------|-------------------------|------------------------------|-------------------------|--------------------|-----------|------------------------------|---------------------|-------------|
| Dry Gas Meter          |                         | Critical Orifice             |                         | Calibration Factor |           | Flowrate                     | 0.3488              |             |
| (V <sub>m(std)</sub> ) | (Q <sub>cr(std)</sub> ) | (V <sub>cr(std)</sub> )      | (Q <sub>cr(std)</sub> ) | Value              | Variation | Std & Corr                   | 0.75 SCFM           | Variation   |
| (Y)                    | (ΔY)                    | (Q <sub>m(std)(corr)</sub> ) | (ΔH@)                   | (Y)                | (ΔY)      | (Q <sub>m(std)(corr)</sub> ) | (ΔH@)               | (ΔΔH@)      |
| cubic feet             | cfm                     | cubic feet                   | cfm                     |                    |           | cfm                          | in H <sub>2</sub> O |             |
| 7.995                  | 0.799                   | 7.893                        | 0.789                   | 0.987              | -0.002    | 0.789                        | 1.899               | 0.014       |
| 7.985                  | 0.799                   | 7.893                        | 0.789                   | 0.989              | -0.001    | 0.789                        | 1.886               | 0.001       |
| 7.953                  | 0.795                   | 7.893                        | 0.789                   | 0.992              | 0.003     | 0.789                        | 1.872               | -0.014      |
| Pretest Gamma          | 0.9744                  | % Deviation                  | 1.5                     | 0.989              | Y Average |                              | 1.886               | ΔH@ Average |

Note: For Calibration Factor Y, the ratio of the reading of the calibration meter to the dry gas meter, acceptable tolerance of individual values from the average is +0.02.

I certify that the above Dry Gas Meter was calibrated in accordance with USEPA Methods, CFR Title 40, Part 60, Appendix A-3, Method 5, 16.2.3

Signature Jonas Gilbert

Date 1/4/2019

## **APPENDIX I-G**

### **Process Data**

December 5, 2018—Pine 75% wt. processed, Runs 1, 2, and 3

| Appendix I-G, Table 1. Process Data, Dryer, December 5, 2018, Run 1 |              |              |              |              |              |         |
|---------------------------------------------------------------------|--------------|--------------|--------------|--------------|--------------|---------|
| Process Parameter                                                   | 8:40<br>a.m. | 8:55<br>a.m. | 9:10<br>a.m. | 9:25<br>a.m. | 9:40<br>a.m. | Average |
| Run Time 8:40-9:47 a.m.                                             |              |              |              |              |              |         |
| Feed Rate, %                                                        | 97.1         | 97.0         | 97.0         | 96.6         | 98.0         | 97.1    |
| Short Tons/Hour                                                     | 75.5         | 75.5         | 75.5         | 75.0         | 76.0         | 75.5    |
| Dryer Outlet Moisture, % wt.                                        | 12.4         | 11.0         | 11.0         | 11.0         | 11.0         | 11.3    |
| Dryer Inlet Moisture, % wt.                                         | 51.6         | 51.5         | 52.5         | 51.5         | 51.5         | 51.7    |
| Production Rate, ODT/Hour                                           | 66.1         | 67.2         | 67.2         | 66.8         | 67.6         | 67.0    |
| RTO Temperature A, F                                                | 1597         | 1606         | 1598         | 1600         | 1605         | 1601    |
| RTO Temperature B, F                                                | 1588         | 1599         | 1587         | 1588         | 1594         | 1591    |
| RTO Temperature C, F                                                | 1606         | 1605         | 1603         | 1603         | 1604         | 1604    |
| RTO Temperature D, F                                                | 1604         | 1603         | 1599         | 1600         | 1603         | 1602    |
| Temperature Average, F                                              | 1599         | 1603         | 1597         | 1598         | 1602         | 1600    |
| WESP Grid 1 kilovolts                                               | 51           | 47           | 49           | 45           | 35           | 45.4    |
| WESP Grid 1 milliamps                                               | 562          | 479          | 508          | 278          | 138          | 393     |
| WESP Grid 2 kilovolts                                               | 47           | 43           | 45           | 42           | 49           | 45.2    |
| WESP Grid 2 milliamps                                               | 439          | 250          | 384          | 213          | 525          | 362     |
| WESP Grid 3 kilovolts                                               | 53           | 53           | 38           | 46           | 50           | 48      |
| WESP Grid 3 milliamps                                               | 311          | 724          | 190          | 447          | 564          | 447     |
| WESP Grid 4 kilovolts                                               | 57           | 49           | 52           | 59           | 48           | 53      |
| WESP Grid 4 milliamps                                               | 971          | 515          | 616          | 1059         | 757          | 784     |

| Appendix I-G, Table 2. Process Data, Dryer, December 5, 2018, Run 2 |               |               |               |               |               |         |
|---------------------------------------------------------------------|---------------|---------------|---------------|---------------|---------------|---------|
| Process Parameter                                                   | 10:47<br>a.m. | 11:02<br>a.m. | 11:17<br>a.m. | 11:34<br>a.m. | 11:49<br>a.m. | Average |
| Run Time 10:47 a.m. – 11:57 a.m.                                    |               |               |               |               |               |         |
| Feed Rate, %                                                        | 96.0          | 95.6          | 95.0          | 95.0          | 94.0          | 95.1    |
| Short Tons/Hour                                                     | 75.0          | 74.0          | 73.5          | 73.5          | 72.0          | 73.6    |
| Dryer Outlet Moisture, % wt.                                        | 12.8          | 12.9          | 12.9          | 12.9          | 12.9          | 12.9    |
| Dryer Inlet Moisture, % wt.                                         | 50.1          | 51.5          | 51.5          | 51.5          | 51.5          | 51.2    |
| Production Rate, ODT/Hour                                           | 65.4          | 64.5          | 64.0          | 64.0          | 62.7          | 64.1    |
| RTO Temperature A, F                                                | 1611          | 1604          | 1602          | 1611          | 1611          | 1608    |
| RTO Temperature B, F                                                | 1599          | 1592          | 1595          | 1599          | 1600          | 1597    |
| RTO Temperature C, F                                                | 1601          | 1604          | 1606          | 1602          | 1602          | 1603    |
| RTO Temperature D, F                                                | 1600          | 1603          | 1604          | 1599          | 1599          | 1601    |
| Temperature Average, F                                              | 1603          | 1601          | 1602          | 1603          | 1603          | 1602    |
| WESP Grid 1 kilovolts                                               | 48            | 52            | 49            | 55            | 44            | 50      |
| WESP Grid 1 milliamps                                               | 356           | 682           | 512           | 700           | 402           | 530     |
| WESP Grid 2 kilovolts                                               | 48            | 49            | 43            | 52            | 55            | 49      |
| WESP Grid 2 milliamps                                               | 448           | 509           | 277           | 640           | 820           | 539     |
| WESP Grid 3 kilovolts                                               | 43            | 42            | 50            | 52            | 45            | 46      |
| WESP Grid 3 milliamps                                               | 250           | 285           | 570           | 694           | 394           | 439     |
| WESP Grid 4 kilovolts                                               | 57            | 51            | 52            | 54            | 43            | 51      |
| WESP Grid 4 milliamps                                               | 964           | 584           | 708           | 676           | 278           | 642     |



| Appendix I-G, Table 3. Process Data, Dryer, December 5, 2018, Run 3 |            |            |            |            |            |         |
|---------------------------------------------------------------------|------------|------------|------------|------------|------------|---------|
| Process Parameter                                                   | 12:15 p.m. | 12:30 p.m. | 12:45 p.m. | 13:00 p.m. | 13:15 p.m. | Average |
| Run Time 12:15 p.m. – 13:27 p.m.                                    |            |            |            |            |            |         |
| Feed Rate, %                                                        | 97         | 94         | 95         | 96         | 94         | 95.2    |
| Short Tons/Hour                                                     | 75.5       | 72         | 73.5       | 75.0       | 72.0       | 73.6    |
| Dryer Outlet Moisture, % wt.                                        | 53.1       | 53.1       | 53.1       | 53.6       | 53.6       | 53.3    |
| Dryer Inlet Moisture, % wt.                                         | 12.0       | 12.0       | 12.0       | 12.2       | 12.2       | 12.1    |
| Production Rate, ODT/Hour                                           | 66.4       | 63.4       | 64.7       | 65.9       | 63.2       | 64.7    |
| RTO Temperature A, F                                                | 1610       | 1606       | 1597       | 1602       | 1601       | 1603    |
| RTO Temperature B, F                                                | 1597       | 1594       | 1588       | 1595       | 1595       | 1594    |
| RTO Temperature C, F                                                | 1597       | 1601       | 1605       | 1606       | 1605       | 1603    |
| RTO Temperature D, F                                                | 1582       | 1601       | 1595       | 1604       | 1603       | 1597    |
| Temperature Average, F                                              | 1597       | 1601       | 1596       | 1602       | 1601       | 1599    |
| WESP Grid 1 kilovolts                                               | 45         | 45         | 58         | 61         | 48         | 51      |
| WESP Grid 1 milliamps                                               | 368        | 353        | 900        | 1129       | 420        | 634     |
| WESP Grid 2 kilovolts                                               | 38         | 52         | 59         | 62         | 62         | 55      |
| WESP Grid 2 milliamps                                               | 160        | 684        | 991        | 1129       | 602        | 713     |
| WESP Grid 3 kilovolts                                               | 45         | 51         | 36         | 53         | 54         | 48      |
| WESP Grid 3 milliamps                                               | 365        | 682        | 181        | 780        | 833        | 568     |
| WESP Grid 4 kilovolts                                               | 58         | 49         | 46         | 50         | 57         | 52      |
| WESP Grid 4 milliamps                                               | 1001       | 550        | 550        | 589        | 1000       | 738     |

| Appendix I-G, Table 4. Process Data, Dryer, December 5, 2018<br>Heat Input Data |           |            |            |
|---------------------------------------------------------------------------------|-----------|------------|------------|
| Parameter                                                                       | Run 1     | Run 2      | Run 3      |
| Start Time                                                                      | 8:40 a.m. | 10:47 a.m. | 12:15 p.m. |
| Fuel Strokes                                                                    | 55        | 55         | 46         |
| Pounds per Stroke                                                               | 558.7     | 558.7      | 558.7      |
| MMBTU per ton                                                                   | 9.2       | 9.2        | 9.2        |
| MMBTU per hour                                                                  | 143.4     | 143.4      | 118.2      |

| Appendix I-G, Table 5. Dry Hammermill Process Data, December 4, 2019, Run 1 |              |              |              |               |               |         |
|-----------------------------------------------------------------------------|--------------|--------------|--------------|---------------|---------------|---------|
| Process Parameter                                                           | 9:15<br>a.m. | 9:30<br>a.m. | 9:45<br>a.m. | 10:00<br>a.m. | 15:00<br>a.m. | Average |
| Run Time 9:15 a.m.-10:23 a.m..                                              |              |              |              |               |               |         |
| Throughput, tons/hour, DHM 1-5                                              | 74.8         | 74.9         | 74.9         | 74.9          | 74.9          | 74.9    |
| Wood Moisture, % wt.                                                        | 12.5         | 12.5         | 12.5         | 12.5          | 12.5          | 12.5    |
| ODT/hour                                                                    | 65.5         | 65.5         | 65.5         | 65.5          | 65.5          | 65.5    |
| DHM1 Differential Pressure, in. w.c.                                        | 7.5          | 7.5          | 7.8          | 8             | 8             | 7.8     |
| DHM2 Differential Pressure, in. w.c.                                        | 10           | 10           | 11           | 16            | 16            | 12.6    |
| DHM3 Differential Pressure, in. w.c.                                        | 8.5          | 8.5          | 7.8          | 8             | 8             | 8.2     |
| DHM4 Differential Pressure, in. w.c.                                        | 10           | 12           | 13           | 13            | 13            | 12.2    |
| DHM5 Differential Pressure, in. w.c.                                        | 9.5          | 11.8         | 12.8         | 12            | 12            | 11.6    |
| Chute 1 Temperature, °F                                                     | 52           | 52           | 52           | 56            | 52            | 53      |
| Chute 2 Temperature, °F                                                     | 58           | 57           | 47           | 56            | 59            | 55      |
| Chute 3 Temperature, °F                                                     | 49           | 47           | 42           | 48            | 51            | 47      |
| Chute 4 Temperature, °F                                                     | 56           | 55           | 48           | 60            | 60            | 56      |
| Chute 5 Temperature, °F                                                     | 47           | 58           | 43           | 50            | 63            | 52      |

| Appendix I-G, Table 6. Dry Hammermill Process Data, December 4, 2019, Run 2 |               |               |               |               |               |         |
|-----------------------------------------------------------------------------|---------------|---------------|---------------|---------------|---------------|---------|
| Process Parameter                                                           | 11:18<br>a.m. | 11:33<br>a.m. | 11:48<br>a.m. | 12:03<br>p.m. | 12:18<br>p.m. | Average |
| Run Time 11:18 a.m.-12:25 p.m..                                             |               |               |               |               |               |         |
| Throughput, tons/hour, DHM 1-5                                              | 73.6          | 74.5          | 74.6          | 74.3          | 74.3          | 74.3    |
| Wood Moisture, % wt.                                                        | 12.5          | 12.5          | 12.5          | 12.5          | 12.5          | 12.5    |
| ODT/hour                                                                    | 64.4          | 65.2          | 65.3          | 65.0          | 65.0          | 65.0    |
| DHM1 Differential Pressure, in. w.c.                                        | 5.5           | 6             | 6             | 6             | 6             | 6       |
| DHM2 Differential Pressure, in. w.c.                                        | 7.2           | 9             | 9             | 10            | 10            | 9       |
| DHM3 Differential Pressure, in. w.c.                                        | 7             | 7.5           | 8             | 7             | 7             | 7       |
| DHM4 Differential Pressure, in. w.c.                                        | 17            | 18            | 18            | 18            | 18            | 18      |
| DHM5 Differential Pressure, in. w.c.                                        | 8             | 7.5           | 7.5           | 10.2          | 10            | 9       |
| Chute 1 Temperature, °F                                                     | 54            | 57            | 60            | 61            | 61            | 59      |
| Chute 2 Temperature, °F                                                     | 47            | 55            | 55            | 53            | 57            | 53      |
| Chute 3 Temperature, °F                                                     | 50            | 52            | 53            | 54            | 54            | 53      |
| Chute 4 Temperature, °F                                                     | 59            | 61            | 61            | 63            | 66            | 62      |
| Chute 5 Temperature, °F                                                     | 50            | 52            | 52            | 54            | 54            | 52      |

| Appendix I-G, Table 7. Dry Hammermill Process Data, December 4, 2019, Run 3 |               |               |               |               |               |         |
|-----------------------------------------------------------------------------|---------------|---------------|---------------|---------------|---------------|---------|
| Process Parameter                                                           | 13:04<br>p.m. | 13:19<br>p.m. | 13:34<br>p.m. | 13:49<br>p.m. | 14:04<br>p.m. | Average |
| Run Time 13:04 a.m.-14:12 p.m..                                             |               |               |               |               |               |         |
| Throughput, tons/hour, DHM 1-5                                              | 73.4          | 74.3          | 74.9          | 74.3          | 72.9          | 74.0    |
| Wood Moisture, % wt.                                                        | 12.5          | 12.5          | 12.5          | 12.5          | 12.5          | 12.5    |
| ODT/hour                                                                    | 64.2          | 65.0          | 65.5          | 65.0          | 63.8          | 64.7    |
| DHM1 Differential Pressure, in. w.c.                                        | 6             | 6.5           | 6.5           | 6.5           | 6.5           | 6       |
| DHM2 Differential Pressure, in. w.c.                                        | 10            | 10            | 11            | 11            | 11            | 11      |
| DHM3 Differential Pressure, in. w.c.                                        | 7             | 7.5           | 8             | 8.5           | 8.5           | 8       |
| DHM4 Differential Pressure, in. w.c.                                        | 17            | 17            | 18            | 18            | 18            | 18      |
| DHM5 Differential Pressure, in. w.c.                                        | 2.5           | 5.7           | 7.5           | 8.5           | 8.5           | 7       |
| Chute 1 Temperature, °F                                                     | 59            | 60            | 55            | 60            | 60            | 59      |
| Chute 2 Temperature, °F                                                     | 54            | 56            | 57            | 59            | 58            | 57      |
| Chute 3 Temperature, °F                                                     | 50            | 53            | 53            | 54            | 54            | 53      |
| Chute 4 Temperature, °F                                                     | 52            | 60            | 61            | 62            | 63            | 60      |
| Chute 5 Temperature, °F                                                     | 57            | 50            | 50            | 52            | 52            | 52      |

**APPENDIX II-A**  
**Method 5-Method 202 Data Sheet**

Date 1/16/2019

|                                                   |                   |            |
|---------------------------------------------------|-------------------|------------|
| Client                                            | Enviva            |            |
| Job #                                             | 2333              |            |
| Plant Name                                        | Enviva, Greenwood |            |
| City, State                                       | Greenwood, SC     |            |
| Sampling Location                                 | RCO 2             |            |
| No. of Ports Available                            | 2                 |            |
| No. of Ports Used                                 | 2                 |            |
| Port Inside Diameter, Inches                      | 4                 |            |
| Distance From Far Wall To Outside Of Port, Inches | 45                |            |
| Nipple Length And/Or Wall Thickness, Inches       | 3                 |            |
| Depth Of Stack Or Duct, Inches                    | 42                |            |
| Stack Or Duct Width (if rectangular), Inches      |                   |            |
| Equiv. Diameter = $2DW/(D+W)$ , Inches            |                   |            |
| Stack/Duct Area, Square Feet                      | 9.621             |            |
| $(\pi R^2 \text{ or } L \times W)$                |                   |            |
|                                                   | Upstream          | Downstream |
| Distance to Flow Disturbances, feet               |                   |            |
| Diameters                                         | 0.0               | 0.0        |

| Diameters |       |       |             |
|-----------|-------|-------|-------------|
| Velocity  | Up    | Down  | Particulate |
| 12        | >7.00 | >1.75 | 12          |
| 12        | 6     | 1.5   | 16          |
| 16        | 5     | 1.25  | 20          |
| 16        | 2     | 0.5   | 24 or 25    |

Note: If more than 8 and 2 diameters and duct is greater than 12" and less than 24", use 8 or 9 points.

| Location of Points in Circular Stacks or Ducts |      |      |      |      |      |      |      |      |      |      |      |
|------------------------------------------------|------|------|------|------|------|------|------|------|------|------|------|
|                                                | 4    | 6    | 8    | 10   | 12   | 14   | 16   | 18   | 20   | 22   | 24   |
| 1                                              | 6.7  | 4.4  | 3.2  | 2.6  | 2.1  | 1.8  | 1.6  | 1.4  | 1.3  | 1.1  | 1.1  |
| 2                                              | 25.0 | 14.6 | 10.5 | 8.2  | 6.7  | 5.7  | 4.9  | 4.4  | 3.9  | 3.5  | 3.2  |
| 3                                              | 75.0 | 29.6 | 19.4 | 14.6 | 11.8 | 9.9  | 8.5  | 7.5  | 6.7  | 6.0  | 5.5  |
| 4                                              | 93.3 | 70.4 | 32.3 | 22.6 | 17.7 | 14.6 | 12.5 | 10.9 | 9.7  | 8.7  | 7.9  |
| 5                                              |      | 85.4 | 67.7 | 34.2 | 25.0 | 20.1 | 16.9 | 14.6 | 12.9 | 1106 | 10.5 |
| 6                                              |      | 95.6 | 80.6 | 65.8 | 35.6 | 26.9 | 22.0 | 18.8 | 16.5 | 14.6 | 13.2 |
| 7                                              |      |      | 89.5 | 77.4 | 64.4 | 36.6 | 28.3 | 23.6 | 20.4 | 18.0 | 16.1 |
| 8                                              |      |      | 96.8 | 85.4 | 75.0 | 63.4 | 37.5 | 29.6 | 25.0 | 21.8 | 19.4 |
| 9                                              |      |      |      | 91.8 | 82.3 | 73.1 | 62.5 | 38.2 | 30.6 | 26.2 | 23   |
| 10                                             |      |      |      | 97.4 | 88.2 | 79.9 | 71.7 | 61.8 | 38.8 | 31.5 | 27.2 |
| 11                                             |      |      |      |      | 93.3 | 85.4 | 78.0 | 70.4 | 61.2 | 39.3 | 32.3 |
| 12                                             |      |      |      |      | 97.9 | 90.1 | 83.1 | 76.4 | 69.4 | 60.7 | 39.8 |
| 13                                             |      |      |      |      |      | 94.3 | 87.5 | 81.2 | 75   | 68.5 | 60.2 |
| 14                                             |      |      |      |      |      | 98.2 | 91.5 | 85.4 | 79.6 | 73.8 | 67.7 |
| 15                                             |      |      |      |      |      |      | 95.1 | 89.1 | 83.5 | 78.2 | 72.8 |
| 16                                             |      |      |      |      |      |      | 98.4 | 92.5 | 87.1 | 82.0 | 77   |
| 17                                             |      |      |      |      |      |      |      | 95.6 | 90.3 | 85.4 | 80.6 |
| 18                                             |      |      |      |      |      |      |      | 98.6 | 93.3 | 88.4 | 83.9 |
| 19                                             |      |      |      |      |      |      |      |      | 96.1 | 91.3 | 86.8 |
| 20                                             |      |      |      |      |      |      |      |      | 98.7 | 94.0 | 89.5 |
| 21                                             |      |      |      |      |      |      |      |      |      | 96.5 | 92.1 |
| 22                                             |      |      |      |      |      |      |      |      |      | 98.9 | 94.5 |
| 23                                             |      |      |      |      |      |      |      |      |      |      | 96.8 |
| 24                                             |      |      |      |      |      |      |      |      |      |      | 99   |

[illegible][illegible]

|                       |                       |
|-----------------------|-----------------------|
| 0.0000 - 0.0625 - 0   | 0.5625 - 0.6875 - 5/8 |
| 0.0625 - 0.1875 - 1/8 | 0.6875 - 0.8125 - 3/4 |
| 0.1875 - 0.3125 - 1/4 | 0.8125 - 0.9375 - 7/8 |
| 0.3125 - 0.4375 - 3/8 | 0.9375 - 1.0000 - 1   |
| 0.4375 - 0.5625 - 1/2 |                       |

| PRELIMINARY INFORMATION                    |                             |                 |                              |                         |                     |        |
|--------------------------------------------|-----------------------------|-----------------|------------------------------|-------------------------|---------------------|--------|
| Plant Name                                 | Enviva, Greenwood           |                 | Date                         | 1/16/2019               |                     |        |
| City, State                                | Greenwood, SC               |                 | Project #                    | 2333                    |                     |        |
| Personnel                                  | JG, EG                      |                 | Pitot Identification         | 3A                      |                     |        |
| Test Location                              | RCO 2                       |                 | Pitot Coefficient (Cp)       | 0.84                    |                     |        |
| <b>Stack Dimensions</b>                    |                             |                 | <b>Pressures</b>             |                         |                     |        |
| Length of Stack (D)                        | 42                          | in              | Barometric Pressure (Pb)     | 29.9                    | in Hg               |        |
| Width of Stack (W)                         |                             | in              | Static Pressure (Pg)         | 3.8                     | in H <sub>2</sub> O |        |
| Area of Stack (As)                         | 9.621                       | ft <sup>2</sup> | Absolute Stack Pressure (Ps) | 30.18                   | in Hg               |        |
| <b>Stack Gas Composition</b>               |                             |                 |                              |                         |                     |        |
| Carbon Dioxide (%CO <sub>2</sub> )         | 0.0                         |                 | Moisture Content (Bws)       | 6.00                    | %                   |        |
| Oxygen (%O <sub>2</sub> )                  | 20.9                        |                 | Dry Molecular Weight (Md)    | 28.84                   | lb/lb-mole          |        |
| Nitrogen Concentration (%N <sub>2</sub> )  | 79.1                        |                 | Wet Molecular Weight (Ms)    | 28.19                   | lb/lb-mole          |        |
| <div>Start</div> <div>End</div>            | <b>Preliminary Traverse</b> |                 |                              |                         |                     |        |
|                                            | Pitot Tube Leak Checks      |                 |                              | A                       | B                   |        |
|                                            | Port                        | Point           | Angle, °                     | Δp, in H <sub>2</sub> O | Temp. °F            | ft/sec |
|                                            | A                           | 1               | 0                            | 0.74                    | 155                 | 52.52  |
|                                            |                             | 2               | 0                            | 0.79                    | 160                 | 54.49  |
|                                            |                             | 3               | 0                            | 0.50                    | 164                 | 43.49  |
|                                            |                             | 4               | 0                            | 0.69                    | 163                 | 51.05  |
|                                            |                             | 5               | -10                          | 0.75                    | 161                 | 53.14  |
|                                            |                             | 6               | -8                           | 0.94                    | 162                 | 59.53  |
|                                            | B                           | 1               | 0                            |                         |                     |        |
|                                            |                             | 2               | -12                          |                         |                     |        |
|                                            |                             | 3               | -8                           |                         |                     |        |
|                                            |                             | 4               | 0                            |                         |                     |        |
|                                            |                             | 5               | 0                            |                         |                     |        |
|                                            |                             | 6               | -3                           |                         |                     |        |
|                                            | X                           | 1               | 0                            |                         |                     |        |
|                                            |                             | 2               | -3                           |                         |                     |        |
|                                            |                             | 3               | -4                           |                         |                     |        |
|                                            |                             | 4               | 2                            |                         |                     |        |
|                                            |                             | 5               | 0                            |                         |                     |        |
|                                            |                             | 6               | 0                            |                         |                     |        |
|                                            |                             | 7               | 0                            |                         |                     |        |
|                                            |                             | 8               | 3                            |                         |                     |        |
|                                            |                             | 9               | 5                            |                         |                     |        |
|                                            | 10                          | 3               |                              |                         |                     |        |
|                                            | 11                          | -2              |                              |                         |                     |        |
|                                            | 12                          | 2               |                              |                         |                     |        |
| Average Angle, Degrees                     |                             |                 | 2.71                         |                         |                     |        |
| Average Velocity Pressure                  |                             |                 | 0.7289                       |                         |                     |        |
|                                            |                             |                 |                              | 160.8                   |                     |        |
| Average Stack Gas Velocity (ft/sec)        |                             |                 | 52.37                        |                         |                     |        |
| Actual Cubic Feet per minute (ACFM)        |                             |                 | 30,234                       |                         |                     |        |
| Dry Standard Cubic Feet per Minute (DSCFM) |                             |                 | 24,380                       |                         |                     |        |

**Air Control Techniques, P.C.**  
**Isokinetic Sampling Train Field Data Sheet**

|              |               |                 |
|--------------|---------------|-----------------|
| <b>Job #</b> | <b>Run ID</b> | <b>M5/202-1</b> |
| 2333         | Method        | 5/202           |

| IDENTIFICATION INFORMATION        |                   |                  |                   | PRELIMINARY CHECKS AND DATA                                                                                                                                                                                                                                                                                                |        |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
|-----------------------------------|-------------------|------------------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------|--------|-----------------------------------|--|--|--|------------------------|------|-------------|------|-------------------|------|------------------|-------|
| Plant                             | Enviva, Greenwood |                  |                   | Pre Leak Check, ACFM                                                                                                                                                                                                                                                                                                       | Actual | Req'd       | Vacuum |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| City, State                       | Greenwood, SC     |                  |                   |                                                                                                                                                                                                                                                                                                                            | 0.00   | <0.02 or 4% | 13     |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Test Location                     | RCO 2             |                  |                   | Post Leak Check, ACFM                                                                                                                                                                                                                                                                                                      | Failed |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Date                              | 1/16/19           |                  | Filter ID 1       |                                                                                                                                                                                                                                                                                                                            |        |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Start                             | 0945              |                  | Filter ID 2       |                                                                                                                                                                                                                                                                                                                            |        |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Stop                              | 1052              |                  | Filter ID 3       |                                                                                                                                                                                                                                                                                                                            |        |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Meterbox ID                       | 909033            | JG, EG           | Operator*         |                                                                                                                                                                                                                                                                                                                            |        |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| ΔH <sub>g</sub>                   | 1.898             | 4A               | Stack TC ID       |                                                                                                                                                                                                                                                                                                                            |        |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Gamma (Y)                         | 0.9744            | NA               | Tedlar Bags       |                                                                                                                                                                                                                                                                                                                            |        |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Ideal Nozzle                      | 0.231             | NA               | Orsat Pump        |                                                                                                                                                                                                                                                                                                                            |        |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Nozzle Dia.                       | 0.238             | 5 SS             | Probe Length/Type |                                                                                                                                                                                                                                                                                                                            |        |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Nozzle ID                         | 2-3               | 2.65             | K Factor          |                                                                                                                                                                                                                                                                                                                            |        |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Probe ID                          | 4A                | 60A              | Umbilic ID        |                                                                                                                                                                                                                                                                                                                            |        |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
|                                   |                   |                  |                   | <table border="1"> <thead> <tr> <th colspan="4">ACTUAL MOISTURE &amp; GAS COMPOSITION</th> </tr> </thead> <tbody> <tr> <td>Water Recovered, grams</td> <td>52.7</td> <td>Moisture, %</td> <td>5.06</td> </tr> <tr> <td>CO<sub>2</sub> %</td> <td>0.04</td> <td>O<sub>2</sub> %</td> <td>20.83</td> </tr> </tbody> </table> |        |             |        | ACTUAL MOISTURE & GAS COMPOSITION |  |  |  | Water Recovered, grams | 52.7 | Moisture, % | 5.06 | CO <sub>2</sub> % | 0.04 | O <sub>2</sub> % | 20.83 |
| ACTUAL MOISTURE & GAS COMPOSITION |                   |                  |                   |                                                                                                                                                                                                                                                                                                                            |        |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Water Recovered, grams            | 52.7              | Moisture, %      | 5.06              |                                                                                                                                                                                                                                                                                                                            |        |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| CO <sub>2</sub> %                 | 0.04              | O <sub>2</sub> % | 20.83             |                                                                                                                                                                                                                                                                                                                            |        |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |

| Sampling Information |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|----------------------|---------------------|----------------------|------------------------|-----------------------------------|-----------------|-----------------|---------------------------------|-----------------|------------------|----------------|---------------|-------------------|---------------------------------|--------------|-----------------|
| Point                | Time Per Pt. (Min.) | Elapsed Time (h:m:s) | Dry Gas Meter (cu.ft.) | Velocity ΔP (In H <sub>2</sub> O) | Meter Temp (°F) | Stack Temp (°F) | Actual ΔH (in H <sub>2</sub> O) | Probe Temp (°F) | Filter Temp (°F) | Exit Temp (°F) | CPM Temp (°F) | Pump Vac (in. Hg) | Target ΔH (in H <sub>2</sub> O) | Run ISO % Pt | Lk √ During Run |
| 1                    | 2.5                 | 0                    | 758.113                | 0.86                              | 41              | 157             | 2.3                             | 259             | 255              | 37             | 70            | 3.75              | 2.301                           | 104.5        | LC 1            |
| 2                    | 2.5                 | 2:30                 | 760.25                 | 0.775                             | 41              | 154             | 2.1                             | 257             | 252              | 38             | 70            | 3.5               | 2.079                           | 104.0        |                 |
| 3                    | 2.5                 | 5:0                  | 762.275                | 0.88                              | 42              | 150             | 2.45                            | 258             | 253              | 41             | 69            | 4                 | 2.382                           | 101.0        |                 |
| 4                    | 2.5                 | 7:30                 | 764.38                 | 0.75                              | 43              | 155             | 2.1                             | 259             | 254              | 44             | 72            | 3.75              | 2.016                           | 105.7        | LC-2            |
| 5                    | 2.5                 | 10:0                 | 766.41                 | 0.64                              | 44              | 150             | 1.75                            | 254             | 251              | 46             | 70            | 3                 | 1.740                           | 103.0        |                 |
| 6                    | 2.5                 | 12:30                | 768.25                 | 0.675                             | 46              | 156             | 1.85                            | 254             | 259              | 48             | 70            | 3                 | 1.826                           | 100.9        |                 |
| 7                    | 2.5                 | 15:0                 | 770.1                  | 0.575                             | 46              | 151             | 1.6                             | 257             | 254              | 50             | 69            | 3                 | 1.567                           | 105.3        | LC-3            |
| 8                    | 2.5                 | 17:30                | 771.89                 | 0.345                             | 48              | 154             | 1                               | 259             | 254              | 52             | 70            | 2.5               | 0.940                           | 108.3        |                 |
| 9                    | 2.5                 | 20:0                 | 773.32                 | 0.58                              | 49              | 152             | 1.6                             | 258             | 255              | 53             | 70            | 3                 | 1.591                           | 106.1        |                 |
| 10                   | 2.5                 | 22:30                | 775.14                 | 0.36                              | 19              | 160             | 1                               | 258             | 255              | 54             | 70            | 3                 | 0.916                           | 107.4        | LC-4            |
| 11                   | 2.5                 | 25:0                 | 776.5                  | 0.29                              | 50              | 156             | 0.8                             | 259             | 255              | 55             | 68            | 2                 | 0.792                           | 100.1        |                 |
| 12                   | 2.5                 | 27:30                | 777.715                | 0.78                              | 51              | 155             | 2.2                             | 259             | 255              | 57             | 70            | 3.5               | 2.139                           | 99.3         |                 |
| 1                    | 2.5                 | 30:0                 | 779.691                | 0.6                               | 54              | 155             | 1.7                             | 260             | 255              | 57             | 72            | 3                 | 1.649                           | 102.3        | LC-5            |
| 2                    | 2.5                 | 32:30                | 781.49                 | 0.67                              | 54              | 155             | 1.9                             | 259             | 255              | 57             | 72            | 3.25              | 1.844                           | 102.1        |                 |
| 3                    | 2.5                 | 35:0                 | 783.385                | 0.58                              | 55              | 157             | 1.6                             | 259             | 254              | 58             | 70            | 3                 | 1.593                           | 101.5        |                 |
| 4                    | 2.5                 | 37:30                | 785.14                 | 0.62                              | 56              | 155             | 1.7                             | 259             | 253              | 59             | 71            | 4                 | 1.713                           | 103.7        | LC-6            |
| 5                    | 2.5                 | 40:0                 | 787                    | 0.6                               | 57              | 158             | 1.7                             | 258             | 254              | 60             | 70            | 2.75              | 1.653                           | 107.7        |                 |
| 6                    | 2.5                 | 42:30                | 788.9                  | 0.85                              | 58              | 157             | 2.4                             | 258             | 256              | 60             | 70            | 4                 | 2.350                           | 104.7        |                 |
| 7                    | 2.5                 | 45:0                 | 791.1                  | 0.8                               | 58              | 159             | 2.2                             | 259             | 255              | 60             | 70            | 3.5               | 2.201                           | 96.2         | LC-7            |
| 8                    | 2.5                 | 47:30                | 793.06                 | 0.63                              | 59              | 153             | 1.8                             | 260             | 256              | 58             | 71            | 3                 | 1.754                           | 102.1        |                 |
| 9                    | 2.5                 | 50:0                 | 794.92                 | 0.87                              | 59              | 162             | 2.4                             | 258             | 259              | 60             | 70            | 4                 | 2.390                           | 102.8        |                 |
| 10                   | 2.5                 | 52:30                | 797.1                  | 0.77                              | 60              | 153             | 2.2                             | 260             | 255              | 58             | 70            | 3.5               | 2.147                           | 101.7        | LC-8            |
| 11                   | 2.5                 | 55:0                 | 799.15                 | 0.98                              | 60              | 160             | 2.7                             | 259             | 254              | 57             | 71            | 4                 | 2.703                           | 104.5        |                 |
| 12                   | 2.5                 | 57:30                | 801.51                 | 0.78                              | 62              | 159             | 2.2                             | 260             | 255              | 57             | 70            | 3.5               | 2.161                           | 102.9        |                 |
|                      |                     | 1:00:0               | 803.595                |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |

| Total        | Averages             |      |       |                     | Maximum and Minimum Values |     |    |    |   | Run ISO |
|--------------|----------------------|------|-------|---------------------|----------------------------|-----|----|----|---|---------|
| Vm 45.482    | 0.665                | 50.5 | 155.5 | 1.885               | 260                        | 259 | 60 | 72 | 4 | 102.4   |
| Vmstd 46.631 | in. H <sub>2</sub> O | °F   | °F    | in H <sub>2</sub> O | 254                        | 251 | 37 | 68 |   | %       |

Run Notes: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

|       |        |          |
|-------|--------|----------|
| Job # | Run ID | M5/202-2 |
| 2333  | Method | 5/202    |

| IDENTIFICATION INFORMATION |                     |                      |                        |                                   |                 |                 |                                   | PRELIMINARY CHECKS AND DATA |                  |                |                  |                   |                                       |                  |       |                 |  |
|----------------------------|---------------------|----------------------|------------------------|-----------------------------------|-----------------|-----------------|-----------------------------------|-----------------------------|------------------|----------------|------------------|-------------------|---------------------------------------|------------------|-------|-----------------|--|
| Plant                      |                     | Enviva, Greenwood    |                        |                                   |                 |                 |                                   | Pre Leak Check, ACFM        |                  | Actual         |                  | Req'd             |                                       | Vacuum           |       |                 |  |
| City, State                |                     | Greenwood, SC        |                        |                                   |                 |                 |                                   |                             |                  | 0.00           |                  | <0.02 or 4%       |                                       | 7                |       |                 |  |
| Test Location              |                     | RCO 2                |                        |                                   |                 |                 |                                   |                             |                  |                |                  | Failed            |                                       |                  |       |                 |  |
| Date                       | 1/16/19             |                      |                        | Filter ID 1                       |                 |                 |                                   | Pitot Pre Leak Check        |                  |                |                  |                   |                                       | A                |       | B               |  |
| Start                      | 1144                |                      |                        | Filter ID 2                       |                 |                 |                                   |                             |                  |                |                  |                   |                                       | 4                |       | 4.5             |  |
| Stop                       | 1318                |                      |                        | Filter ID 3                       |                 |                 |                                   |                             |                  |                |                  |                   |                                       | 4                |       | 4               |  |
| Meterbox ID                | 909033              | JG, EG               | Personnel              |                                   |                 |                 | Ambient Temperature               |                             |                  |                |                  |                   | 49                                    |                  |       |                 |  |
| ΔH@                        | 1.898               | 4A                   | Stack TC ID            |                                   |                 |                 |                                   |                             |                  |                |                  |                   | Static Pressure, In. H <sub>2</sub> O |                  | 0.67  |                 |  |
| Gamma (Y)                  | 0.9744              | NA                   | Tedlar Bags            |                                   |                 |                 |                                   |                             |                  |                |                  |                   | Barometric Pressure, In. Hg           |                  | 30.30 |                 |  |
| Ideal Nozzle               | 0.234               | NA                   | Orsat Pump             |                                   |                 |                 | ACTUAL MOISTURE & GAS COMPOSITION |                             |                  |                |                  |                   |                                       |                  |       |                 |  |
| Nozzle Dia.                | 0.239               | 5                    | Probe Length/Type      |                                   |                 |                 |                                   |                             |                  |                |                  |                   |                                       |                  |       |                 |  |
| Nozzle ID                  | 3-3                 | 2.82                 | K Factor               |                                   |                 |                 |                                   |                             |                  |                |                  |                   |                                       |                  |       |                 |  |
| Probe ID                   | 4A                  | 60A                  | Umbilic ID             |                                   |                 |                 | Water Recovered, grams            |                             | 60.6             |                | Moisture, %      |                   | 5.72                                  |                  |       |                 |  |
|                            |                     |                      |                        |                                   |                 |                 | CO <sub>2</sub> %                 |                             | 0.01             |                | O <sub>2</sub> % |                   | 20.83                                 |                  |       |                 |  |
| Sampling Information       |                     |                      |                        |                                   |                 |                 |                                   |                             |                  |                |                  |                   |                                       |                  |       |                 |  |
| Point                      | Time Per Pt, (Min.) | Elapsed Time (h:m:s) | Dry Gas Meter (cu.ft.) | Velocity ΔP (In H <sub>2</sub> O) | Meter Temp (°F) | Stack Temp (°F) | Actual ΔH (in H <sub>2</sub> O)   | Probe Temp (°F)             | Filter Temp (°F) | Exit Temp (°F) | CPM Temp (°F)    | Pump Vac (in. Hg) | Target ΔH (in H <sub>2</sub> O)       | Run ISO % Pt Cum |       | Lk √ During Run |  |
| 1                          | 2.5                 | 0                    | 810.834                | 0.6                               | 56              | 155             | 1.75                              | 253                         | 244              | 46             | 68               | 3                 | 1.714                                 | 101.8            | 101.8 | LC 1            |  |
| 2                          | 2.5                 | 2:30                 | 812.66                 | 0.65                              | 55              | 162             | 1.9                               | 256                         | 252              | 45             | 69               | 3.25              | 1.832                                 | 101.2            | 101.5 |                 |  |
| 3                          | 2.5                 | 5:0                  | 814.535                | 0.91                              | 55              | 156             | 2.6                               | 254                         | 252              | 47             | 71               | 4.25              | 2.588                                 | 100.7            | 101.2 |                 |  |
| 4                          | 2.5                 | 7:30                 | 816.75                 | 0.65                              | 56              | 164             | 1.9                               | 255                         | 254              | 53             | 72               | 4.25              | 1.825                                 | 104.4            | 102.0 | LC-2            |  |
| 5                          | 2.5                 | 10:0                 | 818.685                | 0.695                             | 56              | 157             | 2                                 | 254                         | 256              | 56             | 72               | 3.5               | 1.977                                 | 99.4             | 101.5 |                 |  |
| 6                          | 2.5                 | 12:30                | 820.6                  | 0.63                              | 57              | 165             | 1.85                              | 255                         | 255              | 58             | 72               | 3.25              | 1.772                                 | 104.6            | 102.0 |                 |  |
| 7                          | 2.5                 | 15:0                 | 822.51                 | 0.64                              | 57              | 165             | 1.85                              | 253                         | 253              | 59             | 73               | 3.5               | 1.801                                 | 101.0            | 101.9 | LC-3            |  |
| 8                          | 2.5                 | 17:30                | 824.37                 | 0.78                              | 58              | 156             | 2.3                               | 256                         | 256              | 58             | 73               | 4.5               | 2.232                                 | 108.8            | 102.8 |                 |  |
| 9                          | 2.5                 | 20:0                 | 826.6                  | 0.9                               | 58              | 165             | 2.55                              | 252                         | 257              | 56             | 73               | 4.25              | 2.535                                 | 109.9            | 103.7 |                 |  |
| 10                         | 2.5                 | 22:30                | 829                    | 0.75                              | 58              | 158             | 2.2                               | 256                         | 256              | 55             | 73               | 3.75              | 2.135                                 | 102.7            | 103.6 | LC-4            |  |
| 11                         | 2.5                 | 25:0                 | 831.06                 | 0.9                               | 58              | 166             | 2.55                              | 254                         | 254              | 54             | 73               | 4                 | 2.532                                 | 99.0             | 103.1 |                 |  |
| 12                         | 2.5                 | 27:30                | 833.22                 | 0.92                              | 58              | 156             | 2.65                              | 255                         | 255              | 54             | 74               | 4.5               | 2.628                                 | 101.7            | 103.0 |                 |  |
| 1                          | 2.5                 | 30:0                 | 835.481                | 0.76                              | 57              | 156             | 2.2                               | 252                         | 256              | 57             | 70               | 4                 | 2.166                                 | 100.0            | 102.8 | LC-5            |  |
| 2                          | 2.5                 | 32:30                | 837.5                  | 0.73                              | 58              | 160             | 2.15                              | 250                         | 255              | 43             | 73               | 4                 | 2.073                                 | 105.2            | 102.9 |                 |  |
| 3                          | 2.5                 | 35:0                 | 839.58                 | 0.88                              | 58              | 164             | 2.5                               | 248                         | 255              | 43             | 76               | 4.5               | 2.484                                 | 102.7            | 102.9 |                 |  |
| 4                          | 2.5                 | 37:30                | 841.8                  | 0.86                              | 59              | 160             | 2.5                               | 244                         | 254              | 46             | 77               | 4.25              | 2.446                                 | 100.4            | 102.7 | LC-6            |  |
| 5                          | 2.5                 | 40:0                 | 843.955                | 0.75                              | 59              | 162             | 2.2                               | 257                         | 255              | 47             | 78               | 3.5               | 2.126                                 | 102.6            | 102.7 |                 |  |
| 6                          | 2.5                 | 42:30                | 846.01                 | 0.75                              | 59              | 159             | 2.2                               | 251                         | 251              | 48             | 78               | 3.75              | 2.138                                 | 100.3            | 102.6 |                 |  |
| 7                          | 2.5                 | 45:0                 | 848.025                | 0.63                              | 60              | 160             | 1.85                              | 252                         | 254              | 49             | 78               | 3.5               | 1.796                                 | 104.4            | 102.7 | LC-7            |  |
| 8                          | 2.5                 | 47:30                | 849.95                 | 0.45                              | 60              | 162             | 1.3                               | 255                         | 253              | 50             | 79               | 3.5               | 1.280                                 | 105.9            | 102.8 |                 |  |
| 9                          | 2.5                 | 50:0                 | 851.6                  | 0.41                              | 60              | 161             | 1.25                              | 255                         | 255</            |                |                  |                   |                                       |                  |       |                 |  |

|       | Total  | Averages             |      |       |                     | Maximum and Minimum Values |     |    |    |   | Run ISO |
|-------|--------|----------------------|------|-------|---------------------|----------------------------|-----|----|----|---|---------|
| Vm    | 46.587 | 0.672                | 58.0 | 160.2 | 1.992               | 257                        | 257 | 59 | 79 | 5 | 102.9   |
| Vmstd | 47.085 | in. H <sub>2</sub> O | °F   | °F    | in H <sub>2</sub> O | 244                        | 244 | 43 | 68 |   | %       |

Run Notes:



|              |               |                 |
|--------------|---------------|-----------------|
| <b>Job #</b> | <b>Run ID</b> | <b>M5/202-3</b> |
| 2333         | <b>Method</b> | <b>5/202</b>    |

| IDENTIFICATION INFORMATION |                     |                      |                        |                                   |                                                                                                                                              |                 |                                 | PRELIMINARY CHECKS AND DATA       |                  |                |               |                   |                                 |                  |       |                 |  |
|----------------------------|---------------------|----------------------|------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|-----------------|---------------------------------|-----------------------------------|------------------|----------------|---------------|-------------------|---------------------------------|------------------|-------|-----------------|--|
| Plant                      | Enviva, Greenwood   |                      |                        |                                   |                                                                                                                                              |                 |                                 | Pre Leak Check, ACFM              |                  | Actual         |               | Req'd             |                                 | Vacuum           |       |                 |  |
| City, State                | Greenwood, SC       |                      |                        |                                   |                                                                                                                                              |                 |                                 |                                   |                  | 0.00           |               | <0.02 or 4%       |                                 | 14.5             |       |                 |  |
| Test Location              | RCO 2               |                      |                        |                                   |                                                                                                                                              |                 |                                 | Post Leak Check, ACFM             |                  | 0.00           |               | 0.020             |                                 | 7                |       |                 |  |
| Date                       | 1/16/19             |                      |                        | Filter ID 1                       | Pitot Pre Leak Check<br>Pitot Post Leak Check<br>Ambient Temperature<br>Static Pressure, In. H <sub>2</sub> O<br>Barometric Pressure, In. Hg |                 | A                               |                                   |                  | B              |               |                   |                                 |                  |       |                 |  |
| Start                      | 1407                |                      |                        | Filter ID 2                       |                                                                                                                                              |                 | 4.5                             |                                   | 4                |                |               |                   |                                 |                  |       |                 |  |
| Stop                       | 1523                |                      |                        | Filter ID 3                       |                                                                                                                                              |                 | 4.25                            |                                   | 6.5              |                |               |                   |                                 |                  |       |                 |  |
| Meterbox ID                | 909033              | JG, EG               | Personnel              |                                   |                                                                                                                                              |                 |                                 |                                   |                  |                |               |                   |                                 |                  |       |                 |  |
| ΔH@                        | 1.898               | 4A                   | Stack TC ID            |                                   |                                                                                                                                              |                 |                                 |                                   |                  |                |               |                   |                                 |                  |       |                 |  |
| Gamma (Y)                  | 0.9744              | NA                   | Tedlar Bags            |                                   |                                                                                                                                              |                 |                                 |                                   |                  |                |               |                   |                                 |                  |       |                 |  |
| Ideal Nozzle               | 0.234               | NA                   | Orsat Pump             |                                   |                                                                                                                                              |                 |                                 |                                   |                  |                |               |                   |                                 |                  |       |                 |  |
| Nozzle Dia.                | 0.238               | 5                    | Probe Length/Type      |                                   |                                                                                                                                              |                 |                                 |                                   |                  |                |               |                   |                                 |                  |       |                 |  |
| Nozzle ID                  | 2-3                 | 2.76                 | K Factor               |                                   |                                                                                                                                              |                 |                                 |                                   |                  |                |               |                   |                                 |                  |       |                 |  |
| Probe ID                   | 4A                  | 60A                  | Umbilic ID             |                                   |                                                                                                                                              |                 |                                 |                                   |                  |                |               |                   |                                 |                  |       |                 |  |
|                            |                     |                      |                        |                                   |                                                                                                                                              |                 |                                 | ACTUAL MOISTURE & GAS COMPOSITION |                  |                |               |                   |                                 |                  |       |                 |  |
|                            |                     |                      |                        |                                   |                                                                                                                                              |                 |                                 | Water Recovered, grams            |                  | 51.3           |               | Moisture, %       |                                 | 5.12             |       |                 |  |
|                            |                     |                      |                        |                                   |                                                                                                                                              |                 |                                 | CO <sub>2</sub> %                 |                  | 0.05           |               | O <sub>2</sub> %  |                                 | 20.84            |       |                 |  |
| Sampling Information       |                     |                      |                        |                                   |                                                                                                                                              |                 |                                 |                                   |                  |                |               |                   |                                 |                  |       |                 |  |
| Point                      | Time Per Pt, (Min.) | Elapsed Time (h:m:s) | Dry Gas Meter (cu.ft.) | Velocity ΔP (In H <sub>2</sub> O) | Meter Temp (°F)                                                                                                                              | Stack Temp (°F) | Actual ΔH (in H <sub>2</sub> O) | Probe Temp (°F)                   | Filter Temp (°F) | Exit Temp (°F) | CPM Temp (°F) | Pump Vac (in. Hg) | Target ΔH (in H <sub>2</sub> O) | Run ISO % Pt Cum |       | Lk √ During Run |  |
| 1                          | 2.5                 | 0                    | 866.663                | 0.74                              | 59                                                                                                                                           | 162             | 2.1                             | 256                               | 249              | 60             | 68            | 3.5               | 2.044                           | 103.8            | 103.8 | LC 1            |  |
| 2                          | 2.5                 | 2:30                 | 868.7                  | 0.74                              | 60                                                                                                                                           | 159             | 2.1                             | 255                               | 246              | 57             | 68            | 3.5               | 2.055                           | 101.2            | 102.5 |                 |  |
| 3                          | 2.5                 | 5:0                  | 870.695                | 0.675                             | 60                                                                                                                                           | 162             | 2                               | 260                               | 253              | 57             | 70            | 3.5               | 1.865                           | 105.4            | 103.4 |                 |  |
| 4                          | 2.5                 | 7:30                 | 872.675                | 0.71                              | 61                                                                                                                                           | 156             | 2                               | 260                               | 254              | 58             | 71            | 3.5               | 1.986                           | 101.3            | 102.9 | LC-2            |  |
| 5                          | 2.5                 | 10:0                 | 874.64                 | 0.7                               | 61                                                                                                                                           | 166             | 2                               | 260                               | 253              | 58             | 71            | 3.5               | 1.926                           | 102.6            | 102.8 |                 |  |
| 6                          | 2.5                 | 12:30                | 876.6                  | 0.64                              | 61                                                                                                                                           | 160             | 1.9                             | 257                               | 254              | 58             | 72            | 3.5               | 1.778                           | 105.6            | 103.3 |                 |  |
| 7                          | 2.5                 | 15:0                 | 878.54                 | 0.42                              | 62                                                                                                                                           | 155             | 1.2                             | 259                               | 254              | 58             | 73            | 2.5               | 1.179                           | 107.4            | 103.7 | LC-3            |  |
| 8                          | 2.5                 | 17:30                | 880.15                 | 0.45                              | 62                                                                                                                                           | 165             | 1.3                             | 259                               | 252              | 57             | 72            | 3.5               | 1.245                           | 98.1             | 103.1 |                 |  |
| 9                          | 2.5                 | 20:0                 | 881.66                 | 0.45                              | 62                                                                                                                                           | 157             | 1.3                             | 259                               | 255              | 57             | 72            | 3.5               | 1.261                           | 102.0            | 103.0 |                 |  |
| 10                         | 2.5                 | 22:30                | 883.24                 | 0.34                              | 63                                                                                                                                           | 166             | 1.3                             | 260                               | 255              | 58             | 73            | 3.5               | 0.941                           | 105.3            | 103.2 | LC-4            |  |
| 11                         | 2.5                 | 25:0                 | 884.65                 | 0.81                              | 63                                                                                                                                           | 156             | 2.3                             | 255                               | 256              | 58             | 74            | 4                 | 2.278                           | 103.4            | 103.3 |                 |  |
| 12                         | 2.5                 | 27:30                | 886.8                  | 0.45                              | 63                                                                                                                                           | 164             | 1.3                             | 259                               | 255              | 58             | 75            | 3                 | 1.246                           | 110.0            | 103.8 |                 |  |
| 1                          | 2.5                 | 30:0                 | 888.497                | 0.52                              | 63                                                                                                                                           | 161             | 1.5                             | 259                               | 254              | 56             | 69            | 3                 | 1.450                           | 106.5            | 104.0 | LC-5            |  |
| 2                          | 2.5                 | 32:30                | 890.267                | 0.65                              | 63                                                                                                                                           | 158             | 1.9                             | 260                               | 254              | 55             | 71            | 3.5               | 1.821                           | 99.4             | 103.6 |                 |  |
| 3                          | 2.5                 | 35:0                 | 892.117                | 0.63                              | 63                                                                                                                                           | 166             | 1.8                             | 260                               | 255              | 54             | 72            | 3.5               | 1.741                           | 103.8            | 103.6 |                 |  |
| 4                          | 2.5                 | 37:30                | 894.007                | 0.7                               | 63                                                                                                                                           | 157             | 1.9                             | 260                               | 254              | 54             | 73            | 3.5               | 1.963                           | 98.8             | 103.3 | LC-6            |  |
| 5                          | 2.5                 | 40:0                 | 895.917                | 0.61                              | 63                                                                                                                                           | 159             | 1.8                             | 261                               | 256              | 55             | 75            | 3.5               | 1.705                           | 105.5            | 103.4 |                 |  |
| 6                          | 2.5                 | 42:30                | 897.817                | 0.65                              | 63                                                                                                                                           | 157             | 1.9                             | 261                               | 257              | 56             | 75            | 3.5               | 1.823                           | 102.3            | 103.4 |                 |  |
| 7                          | 2.5                 | 45:0                 | 899.722                | 0.6                               | 63                                                                                                                                           | 160             | 1.7                             | 258                               | 253              | 56             | 75            | 3.25              | 1.674                           | 108.9            | 103.7 | LC-7            |  |
| 8                          | 2.5                 |                      |                        |                                   |                                                                                                                                              |                 |                                 |                                   |                  |                |               |                   |                                 |                  |       |                 |  |

|       | Total  | Averages             |      |       |                     | Maximum and Minimum Values |     |    |    |   | Run ISO |
|-------|--------|----------------------|------|-------|---------------------|----------------------------|-----|----|----|---|---------|
| Vm    | 44.731 | 0.619                | 62.4 | 160.5 | 1.813               | 262                        | 257 | 60 | 75 | 4 | 102.5   |
| Vmstd | 44.807 | in. H <sub>2</sub> O | °F   | °F    | in H <sub>2</sub> O | 255                        | 246 | 54 | 68 |   | %       |

Run Notes:

**Air Control Techniques, P.C.**  
**Isokinetic Sampling Train Field Data Sheet**

|              |               |                 |
|--------------|---------------|-----------------|
| <b>Job #</b> | <b>Run ID</b> | <b>M5/202-4</b> |
| 2333         | Method        | 5/202           |

| IDENTIFICATION INFORMATION            |                   |             |                   | PRELIMINARY CHECKS AND DATA                                                                                                                                                                                                                                                   |  |  |  |                     |        |                                       |                      |                             |       |                       |     |                       |      |       |    |
|---------------------------------------|-------------------|-------------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|---------------------|--------|---------------------------------------|----------------------|-----------------------------|-------|-----------------------|-----|-----------------------|------|-------|----|
| Plant                                 | Enviva, Greenwood |             |                   | <table border="1"> <tr> <td></td> <td>Actual</td> <td>Req'd</td> <td>Vacuum</td> </tr> <tr> <td>Pre Leak Check, ACFM</td> <td>0.00</td> <td>&lt;0.02 or 4%</td> <td>15</td> </tr> <tr> <td>Post Leak Check, ACFM</td> <td>0.00</td> <td>0.020</td> <td>12</td> </tr> </table> |  |  |  |                     | Actual | Req'd                                 | Vacuum               | Pre Leak Check, ACFM        | 0.00  | <0.02 or 4%           | 15  | Post Leak Check, ACFM | 0.00 | 0.020 | 12 |
|                                       | Actual            | Req'd       | Vacuum            |                                                                                                                                                                                                                                                                               |  |  |  |                     |        |                                       |                      |                             |       |                       |     |                       |      |       |    |
| Pre Leak Check, ACFM                  | 0.00              | <0.02 or 4% | 15                |                                                                                                                                                                                                                                                                               |  |  |  |                     |        |                                       |                      |                             |       |                       |     |                       |      |       |    |
| Post Leak Check, ACFM                 | 0.00              | 0.020       | 12                |                                                                                                                                                                                                                                                                               |  |  |  |                     |        |                                       |                      |                             |       |                       |     |                       |      |       |    |
| City, State                           | Greenwood, SC     |             |                   |                                                                                                                                                                                                                                                                               |  |  |  |                     |        |                                       |                      |                             |       |                       |     |                       |      |       |    |
| Test Location                         | RCO 2 (North)     |             |                   |                                                                                                                                                                                                                                                                               |  |  |  |                     |        |                                       |                      |                             |       |                       |     |                       |      |       |    |
| Date                                  | 1/16/19           | 14469       | Filter ID 1       | <table border="1"> <tr> <td></td> <td>A</td> <td>B</td> </tr> <tr> <td>Pitot Pre Leak Check</td> <td>3.5</td> <td>4</td> </tr> <tr> <td>Pitot Post Leak Check</td> <td>4.2</td> <td>5.1</td> </tr> </table>                                                                   |  |  |  |                     | A      | B                                     | Pitot Pre Leak Check | 3.5                         | 4     | Pitot Post Leak Check | 4.2 | 5.1                   |      |       |    |
|                                       | A                 | B           |                   |                                                                                                                                                                                                                                                                               |  |  |  |                     |        |                                       |                      |                             |       |                       |     |                       |      |       |    |
| Pitot Pre Leak Check                  | 3.5               | 4           |                   |                                                                                                                                                                                                                                                                               |  |  |  |                     |        |                                       |                      |                             |       |                       |     |                       |      |       |    |
| Pitot Post Leak Check                 | 4.2               | 5.1         |                   |                                                                                                                                                                                                                                                                               |  |  |  |                     |        |                                       |                      |                             |       |                       |     |                       |      |       |    |
| Start                                 | 1545              |             | Filter ID 2       |                                                                                                                                                                                                                                                                               |  |  |  |                     |        |                                       |                      |                             |       |                       |     |                       |      |       |    |
| Stop                                  | 1658              |             | Filter ID 3       |                                                                                                                                                                                                                                                                               |  |  |  |                     |        |                                       |                      |                             |       |                       |     |                       |      |       |    |
| Meterbox ID                           | 909033            | JG, EG      | Operator*         | <table border="1"> <tr> <td>Ambient Temperature</td> <td>55</td> </tr> <tr> <td>Static Pressure, In. H<sub>2</sub>O</td> <td>0.67</td> </tr> <tr> <td>Barometric Pressure, In. Hg</td> <td>30.20</td> </tr> </table>                                                          |  |  |  | Ambient Temperature | 55     | Static Pressure, In. H <sub>2</sub> O | 0.67                 | Barometric Pressure, In. Hg | 30.20 |                       |     |                       |      |       |    |
| Ambient Temperature                   | 55                |             |                   |                                                                                                                                                                                                                                                                               |  |  |  |                     |        |                                       |                      |                             |       |                       |     |                       |      |       |    |
| Static Pressure, In. H <sub>2</sub> O | 0.67              |             |                   |                                                                                                                                                                                                                                                                               |  |  |  |                     |        |                                       |                      |                             |       |                       |     |                       |      |       |    |
| Barometric Pressure, In. Hg           | 30.20             |             |                   |                                                                                                                                                                                                                                                                               |  |  |  |                     |        |                                       |                      |                             |       |                       |     |                       |      |       |    |
| ΔH@                                   | 1.898             | 4B          | Stack TC ID       |                                                                                                                                                                                                                                                                               |  |  |  |                     |        |                                       |                      |                             |       |                       |     |                       |      |       |    |
| Gamma (Y)                             | 0.9744            | NA          | Tedlar Bags       |                                                                                                                                                                                                                                                                               |  |  |  |                     |        |                                       |                      |                             |       |                       |     |                       |      |       |    |
| Ideal Nozzle                          | 0.230             | NA          | Orsat Pump        |                                                                                                                                                                                                                                                                               |  |  |  |                     |        |                                       |                      |                             |       |                       |     |                       |      |       |    |
| Nozzle Dia.                           | 0.239             | 5           | Probe Length/Type |                                                                                                                                                                                                                                                                               |  |  |  |                     |        |                                       |                      |                             |       |                       |     |                       |      |       |    |
| Nozzle ID                             | 3-3               | 2.74        | K Factor          |                                                                                                                                                                                                                                                                               |  |  |  |                     |        |                                       |                      |                             |       |                       |     |                       |      |       |    |
| Probe ID                              | 4B                |             | Umbilicle ID      |                                                                                                                                                                                                                                                                               |  |  |  |                     |        |                                       |                      |                             |       |                       |     |                       |      |       |    |

**ACTUAL MOISTURE & GAS COMPOSITION**

|                        |      |                  |       |
|------------------------|------|------------------|-------|
| Water Recovered, grams | 51.1 | Moisture, %      | 5.02  |
| CO <sub>2</sub> %      | 0.02 | O <sub>2</sub> % | 20.89 |

**Sampling Information**

| Point | Time Per Pt. (Min.) | Elapsed Time (h:m:s) | Dry Gas Meter (cu.ft.) | Velocity ΔP (In H <sub>2</sub> O) | Meter Temp (°F) | Stack Temp (°F) | Actual ΔH (in H <sub>2</sub> O) | Probe Temp (°F) | Filter Temp (°F) | Exit Temp (°F) | CPM Temp (°F) | Pump Vac (in. Hg) | Target ΔH (in H <sub>2</sub> O) | Run ISO % Pt | Run ISO % Cum | Lk √ During Run |
|-------|---------------------|----------------------|------------------------|-----------------------------------|-----------------|-----------------|---------------------------------|-----------------|------------------|----------------|---------------|-------------------|---------------------------------|--------------|---------------|-----------------|
| 1     | 2.5                 | 0                    | 911.9                  | 0.9                               | 62              | 161             | 2.6                             | 250             | 251              | 55             | 68            | 4                 | 2.573                           | 100.9        | 100.9         | LC 1            |
| 2     | 2.5                 | 2:30                 | 914.13                 | 0.58                              | 63              | 163             | 1.7                             | 257             | 253              | 54             | 69            | 3.5               | 1.652                           | 92.8         | 97.3          | b               |
| 3     | 2.5                 | 5:0                  | 915.78                 | 0.9                               | 63              | 159             | 2.6                             | 256             | 254              | 54             | 69            | 3.5               | 2.585                           | 100.1        | 98.3          | e               |
| 4     | 2.5                 | 7:30                 | 918                    | 0.55                              | 63              | 162             | 1.6                             | 257             | 254              | 53             | 69            | 3                 | 1.569                           | 98.1         | 98.3          | LC-2            |
| 5     | 2.5                 | 10:0                 | 919.7                  | 0.67                              | 64              | 165             | 2                               | 254             | 254              | 53             | 71            | 4.75              | 1.910                           | 94.2         | 97.5          | b               |
| 6     | 2.5                 | 12:30                | 921.5                  | 0.6                               | 64              | 161             | 1.8                             | 258             | 256              | 54             | 73            | 3.5               | 1.720                           | 109.1        | 99.3          | e               |
| 7     | 2.5                 | 15:0                 | 923.48                 | 0.58                              | 64              | 160             | 1.7                             | 255             | 256              | 54             | 73            | 3.25              | 1.666                           | 103.0        | 99.8          | LC-3            |
| 8     | 2.5                 | 17:30                | 925.32                 | 0.75                              | 65              | 164             | 2.2                             | 254             | 256              | 54             | 74            | 3.75              | 2.145                           | 101.7        | 100.0         | b               |
| 9     | 2.5                 | 20:0                 | 927.38                 | 0.65                              | 65              | 164             | 1.95                            | 256             | 256              | 54             | 76            | 3.5               | 1.857                           | 103.3        | 100.4         | e               |
| 10    | 2.5                 | 22:30                | 929.33                 | 0.63                              | 65              | 163             | 1.9                             | 253             | 252              | 54             | 76            | 3.5               | 1.804                           | 104.3        | 100.8         | LC-4            |
| 11    | 2.5                 | 25:0                 | 931.27                 | 0.8                               | 65              | 170             | 2.3                             | 251             | 255              | 54             | 76            | 4                 | 2.266                           | 102.3        | 100.9         | b               |
| 12    | 2.5                 | 27:30                | 933.4                  | 0.75                              | 66              | 158             | 2.2                             | 255             | 255              | 54             | 77            | 10                | 2.167                           | 106.4        | 101.4         | e               |
| 1     | 2.5                 | 30:0                 | 935.57                 | 0.68                              | 64              | 166             | 2                               | 254             | 254              | 55             | 73            | 3.5               | 1.933                           | 104.4        | 101.6         | LC-5            |
| 2     | 2.5                 | 32:30                | 937.578                | 0.84                              | 64              | 159             | 2.5                             | 256             | 256              | 50             | 70            | 4.5               | 2.416                           | 95.5         | 101.1         | b               |
| 3     | 2.5                 | 35:0                 | 939.628                | 0.74                              | 65              | 167             | 2.2                             | 256             | 255              | 50             | 70            | 4                 | 2.103                           | 104.6        | 101.4         | e               |
| 4     | 2.5                 | 37:30                | 941.728                | 0.63                              | 65              | 159             | 2                               | 255             | 255              | 50             | 69            | 4                 | 1.815                           | 109.4        | 101.9         | LC-6            |
| 5     | 2.5                 | 40:0                 | 943.768                | 0.7                               | 66              | 160             | 2.1                             | 253             | 254              | 50             | 70            | 4                 | 2.018                           | 107.2        | 102.2         | b               |
| 6     | 2.5                 | 42:30                | 945.878                | 0.7                               | 66              | 160             | 2.1                             | 250             | 255              | 50             | 70            | 3.75              | 2.017                           | 102.7        | 102.2         | e               |
| 7     | 2.5                 | 45:0                 | 947.898                | 0.53                              | 66              | 159             | 1.6                             | 252             | 259              | 51             | 70            | 3                 | 1.530                           | 106.7        | 102.4         | LC-7            |
| 8     | 2.5                 | 47:30                | 949.728                | 0.5                               | 66              | 168             | 1.5                             | 255             | 254              | 50             | 70            | 3                 | 1.424                           | 105.8        | 102.6         | b               |
| 9     | 2.5                 | 50:0                 | 951.478                | 0.48                              | 66              | 162             | 1.4                             | 255             | 256              | 49             | 70            | 3                 | 1.381                           | 98.2         | 102.4         | e               |
| 10    | 2.5                 | 52:30                | 953.078                | 0.37                              | 67              | 167             | 1.2                             | 254             | 255              | 49             | 70            | 3                 | 1.058                           | 108.5        | 102.6         | LC-8            |
| 11    | 2.5                 | 55:0                 | 954.628                | 0.34                              | 67              | 162             | 1                               | 253             | 255              | 49             | 70            | 2.5               | 0.981                           | 105.4        | 102.7         | b               |
| 12    | 2.5                 | 57:30                | 956.078                | 0.48                              | 67              | 164             | 1.5                             | 253             | 256              | 49             | 70            | 3                 | 1.381                           | 101.1        | 102.6         | e               |
|       |                     | 1:00:0               | 957.725                |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |               |                 |

|       | Total  | Averages |      |       |        | Maximum and Minimum Values |     |    |    |    |
|-------|--------|----------|------|-------|--------|----------------------------|-----|----|----|----|
| Vm    | 45.825 | 0.631    | 64.9 | 162.6 | 1.902  | 258                        | 259 | 55 | 77 | 10 |
| Vmstd | 45.544 | in. H2O  | °F   | °F    | in H2O | 250                        | 251 | 49 | 68 |    |

| Run ISO |
|---------|
| 102.5   |
| %       |

Run Notes:

---



---



---

**Air Control Techniques, P.C.**  
**Isokinetic Sampling Train Field Data Sheet**

|              |               |                 |
|--------------|---------------|-----------------|
| <b>Job #</b> | <b>Run ID</b> | <b>M5/202-5</b> |
| 2333         | <b>Method</b> | 5/202           |

| IDENTIFICATION INFORMATION                   |                   |        |                   | PRELIMINARY CHECKS AND DATA                                                                                                                                                                                          |        |                  |        |                     |    |                                       |      |                             |       |
|----------------------------------------------|-------------------|--------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|------------------|--------|---------------------|----|---------------------------------------|------|-----------------------------|-------|
| Plant                                        | Enviva, Greenwood |        |                   | Pre Leak Check, ACFM                                                                                                                                                                                                 | Actual | Req'd            | Vacuum |                     |    |                                       |      |                             |       |
| City, State                                  | Greenwood, SC     |        |                   |                                                                                                                                                                                                                      | 0.00   | <0.02 or 4%      | 14     |                     |    |                                       |      |                             |       |
| Test Location                                | RCO 2 (North)     |        |                   | Post Leak Check, ACFM                                                                                                                                                                                                | 0.00   | 0.020            | 8      |                     |    |                                       |      |                             |       |
| Date                                         | 1/16/19           | 14670  | Filter ID 1       |                                                                                                                                                                                                                      |        |                  |        |                     |    |                                       |      |                             |       |
| Start                                        | 1835              |        | Filter ID 2       |                                                                                                                                                                                                                      |        |                  |        |                     |    |                                       |      |                             |       |
| Stop                                         | 2001              |        | Filter ID 3       |                                                                                                                                                                                                                      |        |                  |        |                     |    |                                       |      |                             |       |
| Meterbox ID                                  | 909033            | JG, EG | Personnel         |                                                                                                                                                                                                                      |        |                  |        |                     |    |                                       |      |                             |       |
| ΔH@                                          | 1.898             | 4A     | Stack TC ID       |                                                                                                                                                                                                                      |        |                  |        |                     |    |                                       |      |                             |       |
| Gamma (Y)                                    | 0.9744            | NA     | Tedlar Bags       |                                                                                                                                                                                                                      |        |                  |        |                     |    |                                       |      |                             |       |
| Ideal Nozzle                                 | 0.236             | NA     | Orsat Pump        |                                                                                                                                                                                                                      |        |                  |        |                     |    |                                       |      |                             |       |
| Nozzle Dia.                                  | 0.238             | 5      | Probe Length/Type |                                                                                                                                                                                                                      |        |                  |        |                     |    |                                       |      |                             |       |
| Nozzle ID                                    | 2-3               | 2.82   | K Factor          |                                                                                                                                                                                                                      |        |                  |        |                     |    |                                       |      |                             |       |
| Probe ID                                     | 4A                | 0      | Umbilicle ID      |                                                                                                                                                                                                                      |        |                  |        |                     |    |                                       |      |                             |       |
|                                              |                   |        |                   | <table border="1"> <tr> <td>Ambient Temperature</td> <td>53</td> </tr> <tr> <td>Static Pressure, In. H<sub>2</sub>O</td> <td>0.67</td> </tr> <tr> <td>Barometric Pressure, In. Hg</td> <td>30.20</td> </tr> </table> |        |                  |        | Ambient Temperature | 53 | Static Pressure, In. H <sub>2</sub> O | 0.67 | Barometric Pressure, In. Hg | 30.20 |
| Ambient Temperature                          | 53                |        |                   |                                                                                                                                                                                                                      |        |                  |        |                     |    |                                       |      |                             |       |
| Static Pressure, In. H <sub>2</sub> O        | 0.67              |        |                   |                                                                                                                                                                                                                      |        |                  |        |                     |    |                                       |      |                             |       |
| Barometric Pressure, In. Hg                  | 30.20             |        |                   |                                                                                                                                                                                                                      |        |                  |        |                     |    |                                       |      |                             |       |
| <b>ACTUAL MOISTURE &amp; GAS COMPOSITION</b> |                   |        |                   |                                                                                                                                                                                                                      |        |                  |        |                     |    |                                       |      |                             |       |
|                                              |                   |        |                   | Water Recovered, grams                                                                                                                                                                                               | 44.4   | Moisture, %      | 4.54   |                     |    |                                       |      |                             |       |
|                                              |                   |        |                   | CO <sub>2</sub> %                                                                                                                                                                                                    | 0.17   | O <sub>2</sub> % | 20.86  |                     |    |                                       |      |                             |       |

| Sampling Information |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |           |       |                 |
|----------------------|---------------------|----------------------|------------------------|-----------------------------------|-----------------|-----------------|---------------------------------|-----------------|------------------|----------------|---------------|-------------------|---------------------------------|-----------|-------|-----------------|
| Point                | Time Per Pt. (Min.) | Elapsed Time (h:m:s) | Dry Gas Meter (cu.ft.) | Velocity ΔP (In H <sub>2</sub> O) | Meter Temp (°F) | Stack Temp (°F) | Actual ΔH (in H <sub>2</sub> O) | Probe Temp (°F) | Filter Temp (°F) | Exit Temp (°F) | CPM Temp (°F) | Pump Vac (in. Hg) | Target ΔH (in H <sub>2</sub> O) | Run ISO % |       | Lk ✓ During Run |
| 1                    | 2.5                 | 0                    | 958.963                | 0.58                              | 55              | 159             | 1.7                             | 259             | 255              | 44             | 68            | 3                 | 1.617                           | 97.9      | 97.9  | LC 1            |
| 2                    | 2.5                 | 2:30                 | 960.67                 | 0.7                               | 55              | 154             | 2                               | 259             | 255              | 45             | 71            | 3                 | 1.966                           | 104.6     | 101.4 |                 |
| 3                    | 2.5                 | 5:0                  | 962.68                 | 0.5                               | 55              | 157             | 1.5                             | 257             | 255              | 43             | 72            | 3.5               | 1.397                           | 106.0     | 102.8 |                 |
| 4                    | 2.5                 | 7:30                 | 964.4                  | 0.5                               | 55              | 155             | 1.5                             | 260             | 255              | 46             | 73            | 3                 | 1.403                           | 106.2     | 103.6 | LC-2            |
| 5                    | 2.5                 | 10:0                 | 966.125                | 0.9                               | 54              | 158             | 2.5                             | 260             | 255              | 44             | 73            | 4                 | 2.508                           | 105.1     | 104.0 |                 |
| 6                    | 2.5                 | 12:30                | 968.4                  | 0.65                              | 55              | 159             | 2                               | 258             | 255              | 46             | 71            | 3.5               | 1.808                           | 106.8     | 104.4 |                 |
| 7                    | 2.5                 | 15:0                 | 970.37                 | 0.33                              | 55              | 159             | 1                               | 259             | 260              | 48             | 72            | 3                 | 0.919                           | 101.0     | 104.1 | LC-3            |
| 8                    | 2.5                 | 17:30                | 971.7                  | 0.3                               | 55              | 158             | 0.9                             | 259             | 256              | 45             | 73            | 2                 | 0.839                           | 107.4     | 104.4 |                 |
| 9                    | 2.5                 | 20:0                 | 973.05                 | 0.28                              | 54              | 156             | 0.8                             | 257             | 256              | 45             | 74            | 2                 | 0.784                           | 108.7     | 104.7 |                 |
| 10                   | 2.5                 | 22:30                | 974.37                 | 0.48                              | 55              | 165             | 1.3                             | 258             | 255              | 45             | 74            | 2                 | 1.327                           | 94.9      | 103.8 | LC-4            |
| 11                   | 2.5                 | 25:0                 | 975.87                 | 0.26                              | 55              | 165             | 0.8                             | 258             | 254              | 45             | 74            | 2                 | 0.718                           | 97.1      | 103.4 |                 |
| 12                   | 2.5                 | 27:30                | 977                    | 0.275                             | 55              | 154             | 0.8                             | 259             | 256              | 46             | 75            | 2.5               | 0.774                           | 107.6     | 103.6 |                 |
| 1                    | 2.5                 | 30:0                 | 978.3                  | 0.7                               | 53              | 163             | 2.1                             | 254             | 245              | 45             | 68            | 3.5               | 1.935                           | 103.2     | 103.6 | LC-5            |
| 2                    | 2.5                 | 32:30                | 980.26                 | 0.68                              | 56              | 160             | 2                               | 254             | 254              | 43             | 70            | 3.5               | 1.893                           | 94.2      | 102.8 |                 |
| 3                    | 2.5                 | 35:0                 | 982.04                 | 0.71                              | 54              | 163             | 2.1                             | 255             | 255              | 44             | 70            | 3.5               | 1.960                           | 103.8     | 102.9 |                 |
| 4                    | 2.5                 | 37:30                | 984.03                 | 0.9                               | 54              | 164             | 2.55                            | 255             | 255              | 46             | 71            | 4                 | 2.480                           | 101.2     | 102.7 | LC-6            |
| 5                    | 2.5                 | 40:0                 | 986.21                 | 0.6                               | 54              | 165             | 1.7                             | 257             | 256              | 47             | 72            | 3                 | 1.649                           | 101.6     | 102.6 |                 |
| 6                    | 2.5                 | 42:30                | 988                    | 0.7                               | 54              | 169             | 2                               | 256             | 251              | 46             | 71            | 4                 | 1.916                           | 100.3     | 102.5 |                 |
| 7                    | 2.5                 | 45:0                 | 989.9                  | 0.58                              | 54              | 160             | 1.7                             | 255             | 254              | 46             | 72            | 3.5               | 1.609                           | 99.5      | 102.3 | LC-7            |
| 8                    | 2.5                 | 47:30                | 991.63                 | 0.775                             | 54              | 163             | 2.2                             | 255             | 257              | 47             | 72            | 3.75              | 2.141                           | 107.9     | 102.6 |                 |
| 9                    | 2.5                 | 50:0                 | 993.79                 | 0.77                              | 54              | 155             | 2.2                             | 255             | 255              | 47             | 72            | 4                 | 2.153                           | 104.3     | 102.7 |                 |
| 10                   | 2.5                 | 52:30                | 995.885                | 0.88                              | 54              | 164             | 2.5                             | 257             | 254              | 48             | 73            | 4.5               | 2.425                           | 104.0     | 102.8 | LC-8            |
| 11                   | 2.5                 | 55:0                 | 998.1                  | 0.7                               | 55              | 165             | 2                               | 254             | 249              | 48             | 74            | 4                 | 1.928                           | 108.7     | 103.1 |                 |
| 12                   | 2.5                 | 57:30                | 1000.17                | 0.815                             | 55              | 161             | 2.5                             | 255             | 252              | 48             | 74            | 4                 | 2.262                           | 105.5     | 103.2 |                 |
|                      |                     | 1:00:0               | 1002.34                |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |           |       |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |           |       |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |           |       |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |           |       |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |           |       |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |           |       |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |           |       |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |           |       |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |           |       |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |           |       |                 |

| Total | Averages |                      |      |       |                     | Maximum and Minimum Values |     |    |    |   |
|-------|----------|----------------------|------|-------|---------------------|----------------------------|-----|----|----|---|
| Vm    | 43.38    | 0.588                | 54.5 | 160.5 | 1.765               | 260                        | 260 | 48 | 75 | 5 |
| Vmstd | 43.969   | in. H <sub>2</sub> O | °F   | °F    | in H <sub>2</sub> O | 254                        | 245 | 43 | 68 |   |

| Run ISO |
|---------|
| 102.8   |
| %       |

Run Notes: \_\_\_\_\_

\_\_\_\_\_

**Method 4 - Air Control Techniques, P.C.**

Date 1/16/2019

**Source Information**

|                   |                   |           |        |
|-------------------|-------------------|-----------|--------|
| Plant Name        | Enviva, Greenwood | Job #     | 2333   |
| City, State       | Greenwood, SC     | Personnel | JG, TB |
| Sampling Location | RCO 2 (North)     | Balance   |        |

**Sampling Information**

|                       |           |           |  |  |
|-----------------------|-----------|-----------|--|--|
| Run Number            | M5/202-1  | M5/202-2  |  |  |
| Filter Identification | 14666     | 14667     |  |  |
| Sampling Date         | 1/16/2019 | 1/16/2019 |  |  |

**Moisture Data**Impinger 1 - Empty

|                        |       |       |  |  |
|------------------------|-------|-------|--|--|
| Final Weight, grams    | 426.0 | 431.3 |  |  |
| Initial Weight, grams  | 395.1 | 398.6 |  |  |
| Condensed Water, grams | 30.9  | 32.7  |  |  |

Impinger 2 - Empty

|                        |       |       |  |  |
|------------------------|-------|-------|--|--|
| Final Weight, grams    | 594.3 | 608.7 |  |  |
| Initial Weight, grams  | 591.2 | 606.0 |  |  |
| Condensed Water, grams | 3.1   | 2.7   |  |  |

Impinger 3

|                        |       |       |  |  |
|------------------------|-------|-------|--|--|
| Final Weight, grams    | 728.9 | 705.5 |  |  |
| Initial Weight, grams  | 724.6 | 696.2 |  |  |
| Condensed Water, grams | 4.3   | 9.3   |  |  |

Silica Gel

|                       |       |       |  |  |
|-----------------------|-------|-------|--|--|
| Final Weight, grams   | 820.7 | 820.4 |  |  |
| Initial Weight, grams | 806.3 | 804.5 |  |  |
| Adsorbed Water, grams | 14.4  | 15.9  |  |  |

|                    |      |      |  |  |
|--------------------|------|------|--|--|
| Total Water, grams | 52.7 | 60.6 |  |  |
|--------------------|------|------|--|--|

**Sampling Train Purge Data**

|             |      |      |  |  |
|-------------|------|------|--|--|
| Purge Start | 1128 | 1345 |  |  |
| Purge End   | 1230 | 1445 |  |  |

**Method 4 - Air Control Techniques, P.C.**

Date 1/16/2019

**Source Information**

|                   |                   |           |        |
|-------------------|-------------------|-----------|--------|
| Plant Name        | Enviva, Greenwood | Job #     | 2333   |
| City, State       | Greenwood, SC     | Personnel | JG, TB |
| Sampling Location | RCO 2 (North)     | Balance   |        |

**Sampling Information**

|                       |           |           |           |  |
|-----------------------|-----------|-----------|-----------|--|
| Run Number            | M5/202-3  | M5/202-4  | M5/202-5  |  |
| Filter Identification | 14468     | 14469     | 14670     |  |
| Sampling Date         | 1/16/2019 | 1/16/2019 | 1/16/2019 |  |

**Moisture Data**Impinger 1 - Empty

|                        |       |       |       |  |
|------------------------|-------|-------|-------|--|
| Final Weight, grams    | 421.3 | 427.2 | 414.3 |  |
| Initial Weight, grams  | 396.2 | 399.4 | 396.6 |  |
| Condensed Water, grams | 25.1  | 27.8  | 17.7  |  |

Impinger 2 - Empty

|                        |       |       |       |  |
|------------------------|-------|-------|-------|--|
| Final Weight, grams    | 595.3 | 608.4 | 596.2 |  |
| Initial Weight, grams  | 593.0 | 607.4 | 593.7 |  |
| Condensed Water, grams | 2.3   | 1.0   | 2.5   |  |

Impinger 3

|                        |       |       |       |  |
|------------------------|-------|-------|-------|--|
| Final Weight, grams    | 738.6 | 715.8 | 749.0 |  |
| Initial Weight, grams  | 728.9 | 705.5 | 738.6 |  |
| Condensed Water, grams | 9.7   | 10.3  | 10.4  |  |

Silica Gel

|                       |       |       |       |  |
|-----------------------|-------|-------|-------|--|
| Final Weight, grams   | 834.9 | 832.4 | 807.2 |  |
| Initial Weight, grams | 820.7 | 820.4 | 793.4 |  |
| Adsorbed Water, grams | 14.2  | 12.0  | 13.8  |  |

|                    |      |      |      |  |
|--------------------|------|------|------|--|
| Total Water, grams | 51.3 | 51.1 | 44.4 |  |
|--------------------|------|------|------|--|

**Sampling Train Purge Data**

|             |      |      |      |  |
|-------------|------|------|------|--|
| Purge Start | 1540 | 1712 | 2007 |  |
| Purge End   | 1640 | 1816 | 2107 |  |

**Plant Name** Enviva, Greenwood  
**City, State** Greenwood, SC

**Project #** 2333  
**Test Location** RCO 2

| Parameter                       | Nomenclature/<br>Units | M5/202-1  | M5/202-2  | M5/202-3  | M5/202-4  | M5/202-5  | Average<br>(Run 3, 4, 5) |
|---------------------------------|------------------------|-----------|-----------|-----------|-----------|-----------|--------------------------|
| Date                            |                        | 1/16/2019 | 1/16/2019 | 1/16/2019 | 1/16/2019 | 1/16/2019 |                          |
| Run Time                        | θ, minutes             | 60        | 60        | 60        | 60        | 60        |                          |
| Nozzle Diameter                 | inches                 | 0.238     | 0.239     | 0.238     | 0.239     | 0.238     |                          |
| Production Rate                 | ODT/hour               | 24.3      | 25.2      | 25.1      | 25.2      | 22.9      | 24.4                     |
| Stack Area                      | As - sq. ft.           | 9.62      | 9.62      | 9.62      | 9.62      | 9.62      |                          |
| Pitot Tube Coefficient          | Cp                     | 0.84      | 0.84      | 0.84      | 0.84      | 0.84      |                          |
| Meter Calibration Factor        | Y                      | 0.9744    | 0.9744    | 0.9744    | 0.9744    | 0.9744    |                          |
| Barometric Pressure, inches Hg  | Bp - in Hg             | 30.30     | 30.30     | 30.30     | 30.20     | 30.20     |                          |
| Static Pressure                 | Pg - in. H2O           | 0.67      | 0.67      | 0.67      | 0.67      | 0.67      |                          |
| Stack Pressure                  | Ps - in.Hg             | 30.35     | 30.35     | 30.35     | 30.25     | 30.25     |                          |
| Meter Box Pressure Differential | Δ H - in. H2O          | 1.89      | 1.99      | 1.81      | 1.90      | 1.76      |                          |
| Average Velocity Head           | Δ P - in. H2O          | 0.6651    | 0.6723    | 0.6185    | 0.6308    | 0.5882    |                          |
| Volume of Gas Sampled           | Vm - cu. ft.           | 45.482    | 46.587    | 44.731    | 45.825    | 43.38     |                          |
| Dry Gas Meter Temperature       | Tm - °F                | 50.5      | 58.0      | 62.4      | 64.9      | 54.5      |                          |
| Stack Temperature               | Ts - °F                | 155.5     | 160.2     | 160.5     | 162.6     | 160.5     | 161.2                    |
| Stack Temperature               | Ts - °C                | 68.6      | 71.2      | 71.4      | 72.6      | 71.4      |                          |
| Liquid Collected                | grams                  | 52.7      | 60.6      | 51.3      | 51.1      | 44.4      |                          |
| Oxygen                          | O2 %                   | 20.83     | 20.83     | 20.84     | 20.89     | 20.86     | 20.87                    |
| Carbon Dioxide                  | CO2 %                  | 0.04      | 0.01      | 0.05      | 0.02      | 0.17      | 0.080                    |
| Carbon Monoxide                 | %                      | 0         | 0         | 0         | 0         | 0         |                          |
| Nitrogen                        | N2 %                   | 79.13     | 79.16     | 79.11     | 79.09     | 78.97     |                          |
| Fuel Factor                     |                        | 1.73      | 6.733     | 1.144     | 0.37      | 0.214     |                          |
| Volume of Gas Sampled, Dry      | Vm(std) - cu. ft.      | 46.631    | 47.085    | 44.807    | 45.544    | 43.969    | 44.774                   |
| Volume of Gas Sampled, Dry      | Vm(std) - cu. M        | 1.320     | 1.333     | 1.269     | 1.290     | 1.245     | 1.268                    |
| Volume of Gas Sampled, Dry      | Vm(std) - N cu. M      | 1.230     | 1.242     | 1.182     | 1.201     | 1.159     | 1.181                    |
| Volume of Water Vapor           | Vw(std) - cu. ft.      | 2.485     | 2.857     | 2.419     | 2.409     | 2.093     | 2.307                    |
| Moisture Content                | % H2O                  | 5.06      | 5.72      | 5.12      | 5.02      | 4.54      | 4.90                     |
| Saturation Moisture             | % H2O                  | 28.50     | 31.88     | 32.14     | 33.88     | 32.18     |                          |
| Dry Mole Fraction               | Mfd                    | 0.949     | 0.943     | 0.949     | 0.950     | 0.955     |                          |
| Gas Molecular Weight, Dry       | Md                     | 28.84     | 28.83     | 28.84     | 28.84     | 28.86     |                          |
| Gas Molecular Weight, Wet       | Ms                     | 28.29     | 28.21     | 28.29     | 28.29     | 28.37     |                          |
| Gas Velocity                    | vs - ft./sec.          | 49.59     | 50.11     | 48.02     | 48.65     | 46.83     |                          |
| Gas Velocity                    | m/sec.                 | 15.11     | 15.27     | 14.64     | 14.83     | 14.27     | 14.58                    |
| Volumetric Air Flow, Actual     | Qaw - ACFM             | 28,624    | 28,928    | 27,718    | 28,083    | 27,035    | 27,612                   |
| Volumetric Air Flow, Actual     | m³/min                 | 811       | 819       | 785       | 795       | 766       | 782                      |
| Volumetric Air Flow, Standard   | Qsd - DSCFM            | 23,646    | 23,551    | 22,698    | 22,867    | 22,202    | 22,589                   |
| Volumetric Air Flow, Standard   | Nm³/min                | 624       | 621       | 599       | 603       | 585       | 596                      |
| Isokinetic Sampling Rate        | I %                    | 102.4     | 102.9     | 102.5     | 102.5     | 102.8     | 102.6                    |

#### FILTERABLE PARTICULATE MATTER EMISSIONS

|                              |          |               |               |              |              |               |               |
|------------------------------|----------|---------------|---------------|--------------|--------------|---------------|---------------|
| Filterable Particulate Catch | mg       | 2.3           | 1.2           | 4.7          | 3.8          | 1.2           | 3.233         |
| Concentration                | gr/DSCF  | 0.0008        | 0.0004        | 0.0016       | 0.0013       | 0.0004        | 0.0011        |
| Mass Emission Rate           | lb/hr    | <b>0.15</b>   | <b>0.08</b>   | <b>0.31</b>  | <b>0.25</b>  | <b>0.080</b>  | <b>0.22</b>   |
| Mass Emission Rate           | lbs./ODT | <b>0.0063</b> | <b>0.0032</b> | <b>0.012</b> | <b>0.010</b> | <b>0.0032</b> | <b>0.0086</b> |

#### CONDENSABLE PARTICULATE MATTER EMISSIONS

|                               |          |               |               |               |               |               |               |
|-------------------------------|----------|---------------|---------------|---------------|---------------|---------------|---------------|
| Condensable Particulate Catch | mg       | 0.5           | 2.2           | 2.6           | 1.0           | 1.0           | 1.533         |
| Concentration                 | gr/DSCF  | 0.0002        | 0.0007        | 0.00090       | 0.00034       | 0.00035       | 0.00053       |
| Mass Emission Rate            | lb/hr    | <b>0.03</b>   | <b>0.15</b>   | <b>0.17</b>   | <b>0.07</b>   | <b>0.07</b>   | <b>0.10</b>   |
| Mass Emission Rate            | lbs./ODT | <b>0.0014</b> | <b>0.0058</b> | <b>0.0069</b> | <b>0.0026</b> | <b>0.0029</b> | <b>0.0042</b> |

#### TOTAL PARTICULATE MATTER EMISSIONS

|                    |          |               |               |              |              |              |              |
|--------------------|----------|---------------|---------------|--------------|--------------|--------------|--------------|
| Mass Emission Rate | lb/hr    | <b>0.19</b>   | <b>0.22</b>   | <b>0.49</b>  | <b>0.32</b>  | <b>0.15</b>  | <b>0.32</b>  |
| Mass Emission Rate | lbs./ODT | <b>0.0077</b> | <b>0.0089</b> | <b>0.019</b> | <b>0.013</b> | <b>0.006</b> | <b>0.013</b> |

Note: Run 1 and 2 voided due to post test leak check failure

**APPENDIX II-B**  
**Method 5-Method 202 Laboratory Report**

# RESOLUTION ANALYTICS, INC.

Specialists in Air Emissions Analysis

## ANALYTICAL REPORT

CLIENT: AIR CONTROL TECHNIQUES, INC.

PROJECT: 2333

### ANALYTICAL SERVICES PROVIDED:

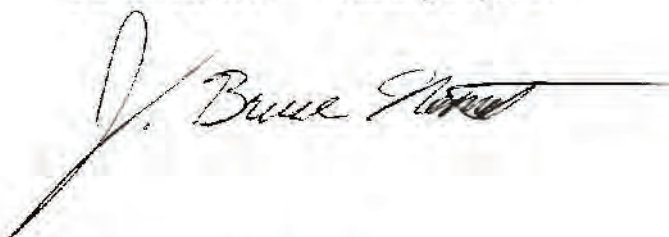
- FILTERABLE & CONDENSIBLE PARTICULATE MATTER  
(EPA METHOD 5/202)

### Confirmation of Data Review:

The analytical data and results provided in this report have been checked thoroughly for accuracy, has been performed and validated in accordance with the approved methods, and relate only to the samples provided for this project report.

The results contained herein shall not be reproduced except in full, without written approval of Resolution Analytics.

Date of Review: January 31, 2019



J. Bruce Nemet  
Quality Assurance Officer

[www.resolutionanalytics.com](http://www.resolutionanalytics.com)  
208 Technology Park Lane, Ste 110, Fuquay-Varina, NC 27526



## Report Summary

| SAMPLE ID          | TOTAL FILTERABLE PARTICULATE |
|--------------------|------------------------------|
| Limit of Detection | 0.2 mg                       |
| Acetone Blank      | 0.2 mg (in 196 mls)          |
| S6-M5/202-1        | 2.3 mg                       |
| S6-M5/202-2        | 1.2 mg                       |
| S6-M5/202-3        | 4.7 mg                       |
| S6-M5/202-4        | 3.8 mg                       |
| S6-M5/202-5        | 1.2 mg                       |

**RESOLUTION ANALYTICS, INC.**

Specialists in Air Emissions Analysis

Client: Air Control Techniques  
RFA #: 2333  
Method: M202

## Report Summary

| SAMPLE ID                 | Organic CPM | Inorganic CPM | Total CPM <sup>1</sup> |
|---------------------------|-------------|---------------|------------------------|
| Limit of Detection        | 0.1 mg      | 0.1 mg        | 0.2 mg                 |
| Acetone Blank             |             |               | 0.2 mg (in 196 ml)     |
| Hexane Blank              |             |               | 0.5 mg (in 190 ml)     |
| DI H <sub>2</sub> O Blank |             |               | 0.6 mg (in 200 ml)     |
| M5/202-PB                 | 1.8 mg      | 0.0 mg        | 1.8 mg                 |
| M5/202-FB                 | 1.2 mg      | 0.8 mg        | 2.0 mg                 |
| S6-M5/202-1               | 1.7 mg      | 0.8 mg        | 0.5 mg                 |
| S6-M5/202-2               | 1.7 mg      | 2.5 mg        | 2.2 mg                 |
| S6-M5/202-3               | 2.2 mg      | 2.4 mg        | 2.6 mg                 |
| S6-M5/202-4               | 1.2 mg      | 1.8 mg        | 1.0 mg                 |
| S6-M5/202-5               | 2.4 mg      | 0.6 mg        | 1.0 mg                 |

<sup>1</sup> Total Condensable Particulate Matter (CPM) results have been Field Blank corrected up to a maximum of 2.0 mg.



301 East Durham Road  
Cary, North Carolina 27513

Office (919) 460-7811  
Fax (919) 460-7897

**Chain of Custody / Transmittal**

**JOB #:** 2333 **PO# -** 9006-2333

**TO:** Resolution Analytics, Inc. Attn: Jeff Coppedge (919) 346-5740  
208 Technology Park Lane Suite 110  
Fuquay Varina, North Carolina 27526

Samples sent by: Todd Brozell Date 1/18/19

| SAMPLE NUMBER                | COMPONENTS                                                                                                                                                                                                                    | ANALYSIS                           |
|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|
| S6-M5/202-1,2,3,4,5<br>PC6AB | <ul style="list-style-type: none"> <li>M5 Filter</li> <li>F<math>\frac{1}{2}</math> Acetone Rinse</li> <li>B<math>\frac{1}{2}</math> Acetone/Hexane Rinse</li> <li>CPM Filter</li> <li>Impinger Catch and DI Rinse</li> </ul> | Total Particulate by Methods 5/202 |
| M5/202-FB<br>Field Blank     | <ul style="list-style-type: none"> <li>B<math>\frac{1}{2}</math> Acetone/Hexane Rinse</li> <li>CPM Filter</li> <li>Impinger Catch and DI Rinse</li> </ul>                                                                     | Total Particulate by Methods 5/202 |
| M5/202-PB<br>Proof Blank     | <ul style="list-style-type: none"> <li>B<math>\frac{1}{2}</math> Acetone/Hexane Rinse</li> <li>CPM Filter</li> <li>Impinger Catch and DI Rinse</li> </ul>                                                                     | Total Particulate by Methods 5/202 |
| Blanks                       | <ul style="list-style-type: none"> <li>Acetone Blank M5</li> <li>Hexane Blank M202</li> <li>DI H<math>_2</math>O Blank M202</li> </ul>                                                                                        | Total Particulate by Methods 5/202 |

Standard Turnaround

Relinquished by: Todd Brozell Date 1/18/19

Received by: Jeffrey S. Coppedge Date 1/22/19



Client: Air Control Techniques  
RFA #: 2333  
Date Received: 1/22/19  
Date Analyzed: 1/23/19  
Analyst: JSC  
Analysis: EPA M5  
Analyte(s): Filterable PM

## Analytical Narrative

---

### Sample Matrix & Components:

Dry Filters, Front<sup>1</sup>/<sub>2</sub> Acetone Rinses, Acetone Blank

### Summary of Sample Prep:

The acetone rinses were transferred to pre-tared teflon "baggies" in a low humidity environment. The acetone rinses were evaporated then desiccated for 24 hours, after which time they were weighed daily every six hours until consecutive weights agreed within  $\pm 0.5$  mg. The filters were baked 2 to 3 hours at 105° C, cooled in a desiccator and weighed.

All weights were recorded to the nearest 0.1 mg and include filterable particulate catch only. The acetone blank catch has been subtracted from sample rinse catches in proportion with their respective volumes.

### Summary of Instrumentation:

Denver model Pinnacle Series analytical balance

**Analytical Detection Limit(s):** 0.1 mg per fraction

**Miscellaneous Comments Regarding Sample Analysis:** (Note unusual catch weights, interferences, odd sample behavior, and steps taken to confirm unusual results. Also note any deviations from standard analytical procedures, together with justification and possible affect on results. Specify samples when applicable.)

No modifications to EPA Method 5 analytical procedure were made. See data sheets for individual sample descriptions.

**PARTICULATE SAMPLING LABORATORY RESULTS**

|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|---------------------------------------|--|------|-------------|--|---------|-------------|---------|--|-------------|--------------------|--|
| Client: <b>Air Control Techniques</b> |  |      |             |  |         |             |         |  |             | RFA #: <b>2333</b> |  |
| Method: EPA M5                        |  |      |             |  |         |             |         |  |             |                    |  |
| Run Number                            |  |      | S6-M5/202-1 |  |         | S6-M5/202-2 |         |  | S6-M5/202-3 |                    |  |
| Filter Container #                    |  |      |             |  |         |             |         |  |             |                    |  |
| Date                                  |  | Init | Date        |  | Date    |             | Date    |  |             |                    |  |
| 1/24/19                               |  | JSC  | 1/24/19     |  | 1/24/19 |             | 1/24/19 |  |             |                    |  |
| Baggie Tare Wt., g.                   |  |      | 0.4677      |  |         | 0.4665      |         |  | 0.4675      |                    |  |
|                                       |  |      | 0.0000      |  |         | 0.0000      |         |  | 0.0000      |                    |  |
| Filter Tare Wt., g.                   |  |      | 0.4684      |  |         | 0.4678      |         |  | 0.4682      |                    |  |
| 83Q-14666                             |  |      | 83Q-14667   |  |         | 83Q-14668   |         |  |             |                    |  |
| FILTER SAMPLE WT., g.                 |  |      | -0.0007 *   |  |         | -0.0013 *   |         |  | -0.0007 *   |                    |  |
| *Filter Fragments In Rinse(Yes, No)?  |  |      | NO          |  |         | NO          |         |  | NO          |                    |  |
| Front ½ Rinse Container #             |  |      |             |  |         |             |         |  |             |                    |  |
| Date                                  |  | Init | Date        |  | Date    |             | Date    |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |
|                                       |  |      |             |  |         |             |         |  |             |                    |  |

\*\*Negative results adjusted to zero.

**Legend:** F = Final Weight

Notes &amp; Comments: Light filter fragments present. Filter loss possible. No visible catch on filters.

**PARTICULATE SAMPLING LABORATORY RESULTS**

| Client: Air Control Techniques       |  |             |  | RFA #: 2333 |  |           |  |
|--------------------------------------|--|-------------|--|-------------|--|-----------|--|
| Method: EPA M5                       |  |             |  |             |  |           |  |
| Run Number                           |  | S6-M5/202-4 |  | S6-M5/202-5 |  | Run 6     |  |
| Filter Container #                   |  |             |  |             |  |           |  |
| Date                                 |  | Init        |  | Date        |  | Date      |  |
| 1/24/19                              |  | JSC         |  | 1/24/19     |  |           |  |
| Baggie Tare Wt., g.                  |  | 0.4678      |  | 0.4605      |  |           |  |
|                                      |  | 0.0000      |  | 0.0000      |  | #N/A      |  |
| Filter Tare Wt., g.                  |  | 0.4686      |  | 83Q-14670   |  | 0.4614    |  |
| 83Q-14669                            |  | -0.0008 *   |  | -0.0009 *   |  | #N/A #N/A |  |
| FILTER SAMPLE WT., g.                |  | NO          |  | NO          |  |           |  |
| *Filter Fragments In Rinse(Yes, No)? |  |             |  |             |  |           |  |
| Front ½ Rinse Container #            |  |             |  |             |  |           |  |
| Date                                 |  | Init        |  | Date        |  | Date      |  |
|                                      |  | 1663        |  | 302         |  |           |  |
| 1/28/19                              |  | JSC         |  | 1/28/19     |  | F         |  |
| 1/25/19                              |  | JSC F       |  | 1/25/19     |  | 3.7437    |  |
| Tare Wt., g.                         |  | ( 110 ml)   |  | ( 100 ml)   |  | 3.7422 (  |  |
| RINSE SAMPLE WT., g.                 |  | 0.0039      |  | 0.0013      |  | ##        |  |
|                                      |  |             |  |             |  | ml) #N/A  |  |
|                                      |  |             |  |             |  | #N/A      |  |
| Filter Catch, mg.                    |  | 0.0 **      |  | 0.0 **      |  | #N/A      |  |
| Rinse Catch, mg.                     |  | 3.9         |  | 1.3         |  | #N/A      |  |
| Rinse Blank Residue, mg.             |  | 0.1         |  | 0.1         |  | 0.0       |  |
| Net Rinse Catch, mg.                 |  | 3.8         |  | 1.2         |  | #N/A #### |  |
| FILTERABLE PARTICULATE, mg.          |  | 3.8         |  | 1.2         |  | #N/A      |  |
| **Negative results adjusted to zero. |  |             |  |             |  |           |  |

\*\*Negative results adjusted to zero.

**Legend:** F = Final Weight

Notes &amp; Comments: Light filter fragments present. Filter loss possible. No visible catch on filters.

## REAGENT BLANK LABORATORY RESULTS

|                                                         |               |                    |
|---------------------------------------------------------|---------------|--------------------|
| <b>Client: Air Control Techniques</b><br>Method: EPA M5 |               | <b>RFA #: 2333</b> |
| <b>Run Number</b>                                       | Acetone Blank |                    |

|                       |         |      |          |
|-----------------------|---------|------|----------|
| Sample ID/Container # |         | 3068 |          |
|                       | Date    | Init |          |
|                       | 1/28/19 | JSC  | 3.6427   |
|                       | 1/25/19 | JSC  | 3.6426   |
| Tare Wt., g.          | (       | 196  | F<br>ml) |
| SAMPLE WT., g.        |         |      | 3.6424   |
|                       |         |      | 0.0002   |

Blank Beaker # 3068  
 Final wt., mg. 3.6426  
 Tare wt., mg. 3.6424  
 Residue, mg. 0.2  
 Volume, ml. 196  
 Density, mg/ml 785.0  
 Conc., mg/mg 1.30E-06 ✓  
 Upper Limit, mg 1.00E-05

**Legend:** F = Final Weight

Notes & Comments:



Client: Air Control Techniques  
RFA #: 2333  
Date Received: 1/22/19  
Date Analyzed: 1/23/19  
Analyst: JSC  
Analysis: M202  
Analyte(s): Condensible PM

## Analytical Narrative

---

### Sample Matrix & Components:

H<sub>2</sub>O liquid impinger samples, organic impinger rinses, CPM filter, reagent blanks

### Summary of Sample Prep and Analysis:

The samples were received in the lab at a temperature of less than 85° F, on ice in a cooler, and logged in our custody records. The teflon filters were each sonicated/extracted 3 times with DI H<sub>2</sub>O, then 3 times with hexane. The extract was added to the appropriate sample fraction. The impinger contents were extracted 3 times with hexane and the extracts were combined with the organic rinses, then evaporated in pretared teflon baggies. The water fraction was evaporated in pretared teflon baggies to near dryness at 105° C, then at ambient until completely dry. When needed, the water fractions were resuspended in 50 mls DI H<sub>2</sub>O, titrated with 0.1 N NH<sub>4</sub>OH until acid neutralization, and then evaporated using the same procedure as before. Samples were then desiccated for 24 hours and weighed at a minimum of 6 hour intervals to constant weight. All weights were recorded to the nearest 0.1 mg. Where field blanks have been provided, samples have been blank corrected up to a maximum of 2.0 mg.

### Summary of Instrumentation:

Denver model Pinnacle Series analytical balance

**Analytical Detection Limit(s):** 0.1 mg per fraction

**Miscellaneous Comments Regarding Sample Analysis:** (Note unusual catch weights, interferences, odd sample behavior, and steps taken to confirm unusual results. Also note any deviations from standard analytical procedures, together with justification and possible affect on results. Specify samples when applicable).

No modifications to M202 analytical procedure were made. See data sheets for individual sample notes and comments.



**CONDENSIBLE PARTICULATE MATTER LABORATORY RESULTS**

| Client: <b>Air Control Techniques</b><br>Method: M202                                     |  |             |  | RFA #: <b>2333</b> |  |             |  |
|-------------------------------------------------------------------------------------------|--|-------------|--|--------------------|--|-------------|--|
| Run Number                                                                                |  | S6-M5/202-1 |  | S6-M5/202-2        |  | S6-M5/202-3 |  |
| Acetone/Hexane Container #                                                                |  | 4012        |  | 1039               |  | 3794        |  |
| Date                                                                                      |  | Init        |  | Date               |  | Date        |  |
| Tare Wt., g.                                                                              |  | 3.6419      |  | 3.6089             |  | 3.6110      |  |
| 1/30/19                                                                                   |  | JSC F       |  | 1/30/19 F          |  | 1/30/19 F   |  |
| 1/29/19                                                                                   |  | JSC         |  | 1/29/19 F          |  | 1/29/19 F   |  |
| Tare Wt., g.                                                                              |  | 3.6422      |  | 3.6089             |  | 3.6110      |  |
| RINSE SAMPLE WT., g.                                                                      |  | 3.6402      |  | 3.6072             |  | 3.6088      |  |
|                                                                                           |  | 0.0017      |  | 0.0017             |  | 0.0022      |  |
| DI H <sub>2</sub> O Container #                                                           |  | 3998        |  | 4128               |  | 2401        |  |
| Date                                                                                      |  | Init        |  | Date               |  | Date        |  |
| Tare Wt., g.                                                                              |  | 3.6275      |  | 3.7115             |  | 3.3863      |  |
| 1/29/19                                                                                   |  | JSC         |  | 1/29/19 F          |  | 1/29/19 F   |  |
| 1/28/19                                                                                   |  | JSC F       |  | 1/28/19            |  | 1/28/19     |  |
| Tare Wt., g.                                                                              |  | 3.6273      |  | 3.7117             |  | 3.3864      |  |
| RINSE SAMPLE WT., g.                                                                      |  | 3.6265      |  | 3.7090             |  | 3.3839      |  |
|                                                                                           |  | 0.0008      |  | 0.0025             |  | 0.0024      |  |
| Organic CPM Mass, mg.                                                                     |  | 1.7         |  | 1.7                |  | 2.2         |  |
| Inorganic CPM Mass, mg                                                                    |  | 0.8         |  | 2.5                |  | 2.4         |  |
| Volume of NH <sub>4</sub> OH Added (N=0.1), ml                                            |  |             |  |                    |  |             |  |
| Correction For NH <sub>3</sub> Added, mg                                                  |  | 0.00        |  | 0.00               |  | 0.00        |  |
| Adjusted Inorganic CPM Mass, mg                                                           |  | 0.8         |  | 2.5                |  | 2.4         |  |
| Total CPM Mass, mg *                                                                      |  | 0.5         |  | 2.2                |  | 2.6         |  |
| * Total CPM Mass results have been Field Train Blank corrected up to a maximum of 2.0 mg. |  |             |  |                    |  |             |  |

Notes &amp; Comments:

**CONDENSIBLE PARTICULATE MATTER LABORATORY RESULTS**

|                                                       |  |             |  |                    |  |       |  |
|-------------------------------------------------------|--|-------------|--|--------------------|--|-------|--|
| Client: <b>Air Control Techniques</b><br>Method: M202 |  |             |  | RFA #: <b>2333</b> |  |       |  |
| Run Number                                            |  | S6-M5/202-4 |  | S6-M5/202-5        |  | Run 6 |  |

|                            |      |      |  |      |  |  |  |
|----------------------------|------|------|--|------|--|--|--|
| Acetone/Hexane Container # |      | 3071 |  | 3281 |  |  |  |
| Date                       | Init | Date |  | Date |  |  |  |

|                      |     |   |        |         |   |        |      |
|----------------------|-----|---|--------|---------|---|--------|------|
| 1/30/19              | JSC | F | 3.8338 | 1/30/19 | F | 3.9860 |      |
| 1/29/19              | JSC |   | 3.8341 | 1/29/19 |   | 3.9864 | ##   |
| Tare Wt., g.         |     |   | 3.8326 |         |   | 3.9836 | #N/A |
| RINSE SAMPLE WT., g. |     |   | 0.0012 |         |   | 0.0024 | #N/A |

---

|                                 |      |      |  |      |  |  |  |
|---------------------------------|------|------|--|------|--|--|--|
| DI H <sub>2</sub> O Container # |      | 52   |  | 1695 |  |  |  |
| Date                            | Init | Date |  | Date |  |  |  |

|                      |     |   |        |         |   |        |      |
|----------------------|-----|---|--------|---------|---|--------|------|
| 1/29/19              | JSC | F | 3.7273 | 1/29/19 | F | 3.7354 |      |
| 1/28/19              | JSC |   | 3.7274 | 1/28/19 |   | 3.7356 | ##   |
| Tare Wt., g.         |     |   | 3.7255 |         |   | 3.7348 | #N/A |
| RINSE SAMPLE WT., g. |     |   | 0.0018 |         |   | 0.0006 | #N/A |

---

|                                                |            |            |             |
|------------------------------------------------|------------|------------|-------------|
| <b>Organic CPM Mass, mg.</b>                   | <b>1.2</b> | <b>2.4</b> | <b>#N/A</b> |
| <b>Inorganic CPM Mass, mg</b>                  | <b>1.8</b> | <b>0.6</b> | <b>#N/A</b> |
| Volume of NH <sub>4</sub> OH Added (N=0.1), ml |            |            |             |
| Correction For NH <sub>3</sub> Added, mg       | 0.00       | 0.00       | 0.00        |
| <b>Adjusted Inorganic CPM Mass, mg</b>         | <b>1.8</b> | <b>0.6</b> | <b>#N/A</b> |
| <b>Total CPM Mass, mg *</b>                    | <b>1.0</b> | <b>1.0</b> | <b>#N/A</b> |

\* Total CPM Mass results have been Field Train Blank corrected up to a maximum of 2.0 mg.

Notes &amp; Comments:

**FIELD TRAIN BLANK LABORATORY RESULTS**

|                                                       |           |                    |
|-------------------------------------------------------|-----------|--------------------|
| Client: <b>Air Control Techniques</b><br>Method: M202 |           | RFA #: <b>2333</b> |
| Run Number                                            | M5/202-PB |                    |

Acetone/Hexane Container # 3458

|      |      |
|------|------|
| Date | Init |
|------|------|

|                      |         |     |   |        |
|----------------------|---------|-----|---|--------|
|                      | 1/30/19 | JSC | F | 3.7009 |
|                      | 1/29/19 | JSC |   | 3.7012 |
| Tare Wt., g.         |         |     |   | 3.6991 |
| RINSE SAMPLE WT., g. |         |     |   | 0.0018 |

DI H<sub>2</sub>O Container # 2808

|      |      |
|------|------|
| Date | Init |
|------|------|

|                      |         |     |   |        |
|----------------------|---------|-----|---|--------|
|                      | 1/29/19 | JSC | F | 3.5998 |
|                      | 1/28/19 | JSC | F | 3.5998 |
| Tare Wt., g.         |         |     |   | 3.5998 |
| RINSE SAMPLE WT., g. |         |     |   | 0.0000 |

|                                                |            |
|------------------------------------------------|------------|
| <b>Organic CPM Mass, mg.</b>                   | <b>1.8</b> |
| <b>Inorganic CPM Mass, mg</b>                  | <b>0.0</b> |
| Volume of NH <sub>4</sub> OH Added (N=0.1), ml |            |
| Correction For NH <sub>3</sub> Added, mg       | 0.00       |
| <b>Adjusted Inorganic CPM Mass, mg</b>         | <b>0.0</b> |
| <b>Total Proof Blank CPM Mass, mg</b>          | <b>1.8</b> |

Notes &amp; Comments:

**FIELD TRAIN BLANK LABORATORY RESULTS**

|                                                       |           |                    |
|-------------------------------------------------------|-----------|--------------------|
| Client: <b>Air Control Techniques</b><br>Method: M202 |           | RFA #: <b>2333</b> |
| Run Number                                            | M5/202-FB |                    |

Acetone/Hexane Container # 3164

|      |      |
|------|------|
| Date | Init |
|------|------|

|                      |         |     |   |        |
|----------------------|---------|-----|---|--------|
|                      | 1/30/19 | JSC |   | 3.8673 |
|                      | 1/29/19 | JSC | F | 3.8671 |
| Tare Wt., g.         |         |     |   | 3.8659 |
| RINSE SAMPLE WT., g. |         |     |   | 0.0012 |

DI H<sub>2</sub>O Container # 3906

|      |      |
|------|------|
| Date | Init |
|------|------|

|                      |         |     |   |        |
|----------------------|---------|-----|---|--------|
|                      | 1/29/19 | JSC | F | 3.5187 |
|                      | 1/28/19 | JSC | F | 3.5187 |
| Tare Wt., g.         |         |     |   | 3.5179 |
| RINSE SAMPLE WT., g. |         |     |   | 0.0008 |

|                                                |            |
|------------------------------------------------|------------|
| <b>Organic CPM Mass, mg.</b>                   | <b>1.2</b> |
| <b>Inorganic CPM Mass, mg</b>                  | <b>0.8</b> |
| Volume of NH <sub>4</sub> OH Added (N=0.1), ml |            |
| Correction For NH <sub>3</sub> Added, mg       | 0.00       |
| <b>Adjusted Inorganic CPM Mass, mg</b>         | <b>0.8</b> |
| <b>Total Field Train Blank CPM Mass, mg</b>    | <b>2.0</b> |

Notes &amp; Comments:

## FIELD REAGENT BLANK LABORATORY RESULTS

|                                                       |         |                    |                     |
|-------------------------------------------------------|---------|--------------------|---------------------|
| Client: <b>Air Control Techniques</b><br>Method: M202 |         | RFA #: <b>2333</b> |                     |
| Run Number                                            | Acetone | Hexane             | DI H <sub>2</sub> O |

|             |      |      |      |      |      |      |      |
|-------------|------|------|------|------|------|------|------|
| Container # |      |      | 3068 |      | 3405 |      | 2814 |
|             | Date | Init |      | Date |      | Date |      |

|                |         |     |     |        |         |   |     |        |         |   |     |        |
|----------------|---------|-----|-----|--------|---------|---|-----|--------|---------|---|-----|--------|
|                | 1/28/19 | JSC |     | 3.6427 | 1/30/19 | F |     | 3.6617 | 1/29/19 | F |     | 3.7947 |
|                | 1/25/19 | JSC | F   | 3.6426 | 1/29/19 |   |     | 3.6622 | 1/28/19 |   |     | 3.7948 |
| Tare Wt., g.   |         | (   | 196 | ml)    |         | ( | 190 | ml)    |         | ( | 200 | ml)    |
| SAMPLE WT., g. |         |     |     | 3.6424 |         |   |     | 3.6612 |         |   |     | 3.7941 |
|                |         |     |     | 0.0002 |         |   |     | 0.0005 |         |   |     | 0.0006 |

|                                          |          |          |          |
|------------------------------------------|----------|----------|----------|
| Field Reagent Blank Mass, mg             | 0.2      | 0.5      | 0.6      |
| Field Reagent Blank Concentration, mg/mg | 1.30E-06 | 4.02E-06 | 3.00E-06 |

Notes & Comments:

✓

Date Received: 1/22/19  
Date Analyzed: 1/23/19

[illegible]

✓

Date Received: 1/22/19  
Date Analyzed: 1/23/19

[illegible]

**APPENDIX II-C**  
**CEMs Data Sheets**



| Enviva                    |                                         | RCO 2 (North) |           |
|---------------------------|-----------------------------------------|---------------|-----------|
| Parameters                | Units                                   | Run 1         | Run 2     |
| Date                      |                                         | 16-Jan-19     | 16-Jan-19 |
| Run Time                  |                                         | 0945-1052     | 1229-1329 |
| Oxygen                    | %                                       | 20.83         | 20.83     |
| Moisture                  | %                                       | 5.06          | 5.72      |
| Volumetric Flow Rate, Std | DSCFM                                   | 28624         | 28928     |
| Process Rate              | ODT/hr                                  | 24.3          | 25.2      |
| VOC Emissions             | Units                                   | Run 1         | Run 2     |
| Concentration (actual)    | ppmv <sub>w</sub> as C <sub>3</sub>     | 8.24          | 7.32      |
| Concentration (dry)       | ppmv <sub>d</sub> as C <sub>3</sub>     | 8.68          | 7.76      |
| Emission Rate (propane)   | lb/hr as C <sub>3</sub> H <sub>8</sub>  | 1.71          | 1.54      |
| Emission Factor (propane) | lb/ODT as C <sub>3</sub> H <sub>8</sub> | 0.070         | 0.061     |
| NOx Emissions             | Units                                   | Run 1         | Run 2     |
| Concentration (dry)       | ppm <sub>vd</sub>                       | 1.0           | 0.8       |
| Emission Rate             | lb/hr                                   | 0.205         | 0.168     |
| Emission Factor           | lb/ODT                                  | 0.008         | 0.007     |
| CO Emissions              | Units                                   | Run 1         | Run 2     |
| Concentration (dry)       | ppm <sub>vd</sub>                       | 13.2          | 12.1      |
| Emission Rate             | lb/hr                                   | 1.65          | 1.53      |
| Emission Factor           | lb/ODT                                  | 0.068         | 0.061     |

Facility: Enviva  
Date: 1/16/19

Source: RCO 2 (North)

| HAP             |            | Methanol          | Acetaldehyde        | Formaldehyde      | HCl                           | Sampling Data   |
|-----------------|------------|-------------------|---------------------|-------------------|-------------------------------|-----------------|
| Formula         |            | CH <sub>4</sub> O | CH <sub>3</sub> CHO | CH <sub>2</sub> O | C <sub>6</sub> H <sub>6</sub> |                 |
| Mol Weight      | lb/lb mole | 32.04             | 44.05               | 30.31             | 36.46                         |                 |
| Response Factor |            | 0.65              | 1.00                | 0.00              | 0.00                          |                 |
| <b>Run 1</b>    |            |                   |                     |                   |                               |                 |
| Conc            | ppm wet    | 0.00              | 0.00                | 0.86              | 0.00                          |                 |
| Conc            | ppm dry    | 0.00              | 0.00                | 0.91              | 0.00                          | 5.06 % Moisture |
| Mass Emissions  | lb/hr      | 0.00              | 0.00                | 0.12              | 0.00                          | 28,624 DSCFM    |
| Emission Factor | lb/ODT     | 0.0000            | 0.0000              | 0.0051            | 0.00                          | 24.3 ODT/hr     |
| <b>Run 2</b>    |            |                   |                     |                   |                               |                 |
| Conc            | ppm wet    | 0.00              | 0.00                | 0.64              | 0.00                          |                 |
| Conc            | ppm dry    | 0.00              | 0.00                | 0.68              | 0.00                          | 5.72 % Moisture |
| Mass Emissions  | lb/hr      | 0.00              | 0.00                | 0.09              | 0.00                          | 28,928 DSCFM    |
| Emission Factor | lb/ODT     | 0.0000            | 0.00                | 0.0037            | 0.00                          | 25.2 ODT/hr     |
| ND values       |            |                   |                     |                   |                               |                 |

Enviva  
RCO 2 (North)

Date: 16-Jan-19  
Run Time: 0945-1052

Run 1

| Parameter                                                     | Symbol                 | O <sub>2</sub><br>% | CO <sub>2</sub><br>% | CO<br>ppm    | NOx<br>ppm  | THC<br>ppm (as C <sub>3</sub> H <sub>8</sub> ) |
|---------------------------------------------------------------|------------------------|---------------------|----------------------|--------------|-------------|------------------------------------------------|
| <b>Analyzer Calibration Error - Calibration Standards</b>     |                        |                     |                      |              |             |                                                |
| Zero Gas                                                      | $C_{v, zero}$          | 0.0                 | 0.0                  | 0.0          | 0.0         | 0.0                                            |
| Low-Level Gas                                                 | $C_{v, low}$           | N/A                 | N/A                  | N/A          | N/A         | 25.25                                          |
| Mid-Level Gas                                                 | $C_{v, mid}$           | 11.05               | 9.952                | 125.6        | 48.0        | 52.38                                          |
| High-Level Gas                                                | $C_{v, high}$          | 21.99               | 18.22                | 227.0        | 89.5        | 85.84                                          |
| Calibration Span                                              | CS                     | 21.99               | 18.22                | 227.0        | 89.5        | 100                                            |
| <b>Analyzer Calibration Error - Instrument Response</b>       |                        |                     |                      |              |             |                                                |
| Zero Gas                                                      | $C_{Dir, zero}$        | 0.00                | -0.06                | -0.07        | 0.0         | 0.1                                            |
| Low-Level Gas                                                 | $C_{Dir, low}$         | N/A                 | N/A                  | N/A          | N/A         | 26.1                                           |
| Mid-Level Gas                                                 | $C_{Dir, mid}$         | 11.075              | 9.989                | 127.7        | 47.96       | 52.35                                          |
| High-Level Gas                                                | $C_{Dir, high}$        | 22.04               | 18.20                | 227.4        | 89.6        | 85.8                                           |
| <b>Analyzer Calibration Error - Results (Percent of Span)</b> |                        |                     |                      |              |             |                                                |
| Zero Gas                                                      | $ACE_{zero}$           | 0.0                 | -0.3                 | 0.0          | 0.0         | 0.1                                            |
| Low-Level Gas                                                 | $ACE_{low}$            | N/A                 | N/A                  | N/A          | N/A         | 3.4                                            |
| Mid-Level Gas                                                 | $ACE_{mid}$            | 0.1                 | 0.2                  | 0.9          | 0.0         | -0.1                                           |
| High-Level Gas                                                | $ACE_{high}$           | 0.2                 | -0.1                 | 0.2          | 0.1         | 0.0                                            |
| Specification                                                 | $ACE_{spec}$           | ±2                  | ±2                   | ±2           | ±2          | ±5                                             |
| <b>System Calibrations - Instrument Response</b>              |                        |                     |                      |              |             |                                                |
| Initial Zero                                                  | $C_{s, zero (pre)}$    | 0.05                | -0.06                | -0.1         | 0.7         | 0.1                                            |
| Final Zero                                                    | $C_{s, zero (post)}$   | 0.02                | 0.01                 | 0.77         | 0.6         | -0.05                                          |
| Upscale Gas Standard                                          | $C_{MA}$               | 21.99               | 18.22                | 125.6        | 48.0        | 52.4                                           |
| Initial Upscale                                               | $C_{v, up (pre)}$      | 21.99               | 18.10                | 126.2        | 47.7        | 52.35                                          |
| Final Upscale                                                 | $C_{v, up (post)}$     | 22                  | 18.12                | 127.09       | 47.6        | 52.11                                          |
| <b>System Bias - Results (Percent)</b>                        |                        |                     |                      |              |             |                                                |
| Zero (pre)                                                    | $SB_{i (zero)}$        | 0.2                 | 0.0                  | 0.0          | 0.7         | 0.0                                            |
| Zero (post)                                                   | $SB_{final (zero)}$    | 0.1                 | 0.4                  | 0.4          | 0.6         | -0.2                                           |
| Upscale (pre)                                                 | $SB_{i (upscale)}$     | -0.2                | -0.5                 | -0.7         | -0.3        | 0.0                                            |
| Upscale (post)                                                | $SB_{final (upscale)}$ | -0.2                | -0.4                 | -0.3         | -0.4        | -0.2                                           |
| Specification                                                 | $SB_{spec}$            | ±5                  | ±5                   | ±5           | ±5          | NA                                             |
| <b>System Drift - Results (Percent)</b>                       |                        |                     |                      |              |             |                                                |
| Zero                                                          | $D_{zero}$             | 0.1                 | 0.4                  | 0.4          | 0.1         | -0.2                                           |
| Upscale                                                       | $D_{upscale}$          | 0.0                 | 0.1                  | 0.4          | 0.1         | -0.2                                           |
| Specification                                                 | $D_{spec}$             | ±3                  | 3.0                  | 3.0          | 3.0         | ±3                                             |
| <b>Response Test - Results (seconds)</b>                      |                        |                     |                      |              |             |                                                |
| Upscale Test                                                  |                        | 35                  | 30                   | 35           | 30          | NA                                             |
| Zero Test                                                     |                        | 35                  | 30                   | 35           | 30          | NA                                             |
| Response Time                                                 |                        | 35                  | 30                   | 35           | 30          | 25                                             |
| <b>Calibration Correction</b>                                 |                        |                     |                      |              |             |                                                |
| Raw Average                                                   | $C_{ave}$              | 20.84               | 0.01                 | 13.6         | 1.6         | 8.2                                            |
| Bias Average - Zero                                           | $C_0$                  | 0.03                | -0.03                | 0.34         | 0.65        | N/A                                            |
| Bias Average - Upscale                                        | $C_M$                  | 22.00               | 18.11                | 126.65       | 47.65       | N/A                                            |
| Corrected Run Average                                         | $C_{Gas}$              | <b>20.83</b>        | <b>0.04</b>          | <b>13.20</b> | <b>1.00</b> | <b>8.2</b>                                     |

Enviva  
RCO 2 (North)

Date: 16-Jan-19  
Run Time: 1229-1329

Run 2

| Parameter                                                     | Symbol                 | O <sub>2</sub><br>% | CO <sub>2</sub><br>% | CO<br>ppm    | NOx<br>ppm  | THC<br>ppm (as C <sub>3</sub> H <sub>8</sub> ) |
|---------------------------------------------------------------|------------------------|---------------------|----------------------|--------------|-------------|------------------------------------------------|
| <b>Analyzer Calibration Error - Calibration Standards</b>     |                        |                     |                      |              |             |                                                |
| Zero Gas                                                      | $C_{v, zero}$          | 0.0                 | 0.0                  | 0.0          | 0.0         | 0.0                                            |
| Low-Level Gas                                                 | $C_{v, low}$           | N/A                 | N/A                  | N/A          | N/A         | 25.3                                           |
| Mid-Level Gas                                                 | $C_{v, mid}$           | 11.1                | 10.0                 | 125.6        | 48.0        | 52.4                                           |
| High-Level Gas                                                | $C_{v, high}$          | 22.0                | 18.2                 | 227.0        | 89.5        | 85.8                                           |
| Calibration Span                                              | CS                     | 22.0                | 18.2                 | 227.0        | 89.5        | 100                                            |
| <b>Analyzer Calibration Error - Instrument Response</b>       |                        |                     |                      |              |             |                                                |
| Zero Gas                                                      | $C_{Dir, zero}$        | 0.0                 | -0.1                 | -0.1         | 0.0         | 0.1                                            |
| Low-Level Gas                                                 | $C_{Dir, low}$         | N/A                 | N/A                  | N/A          | N/A         | 26.1                                           |
| Mid-Level Gas                                                 | $C_{Dir, mid}$         | 11.1                | 10.0                 | 127.7        | 48.0        | 52.4                                           |
| High-Level Gas                                                | $C_{Dir, high}$        | 22.0                | 18.2                 | 227.4        | 89.6        | 85.8                                           |
| <b>Analyzer Calibration Error - Results (Percent of Span)</b> |                        |                     |                      |              |             |                                                |
| Zero Gas                                                      | $ACE_{zero}$           | 0.0                 | -0.3                 | 0.0          | 0.0         | 0.1                                            |
| Low-Level Gas                                                 | $ACE_{low}$            | N/A                 | N/A                  | N/A          | N/A         | 3.4                                            |
| Mid-Level Gas                                                 | $ACE_{mid}$            | 0.1                 | 0.2                  | 0.9          | 0.0         | -0.1                                           |
| High-Level Gas                                                | $ACE_{high}$           | 0.2                 | -0.1                 | 0.2          | 0.1         | 0.0                                            |
| Specification                                                 | $ACE_{spec}$           | ±2                  | ±2                   | ±2           | ±2          | ±5                                             |
| <b>System Calibrations - Instrument Response</b>              |                        |                     |                      |              |             |                                                |
| Initial Zero                                                  | $C_{s, zero (pre)}$    | 0.02                | 0.01                 | 0.77         | 0.60        | -0.05                                          |
| Final Zero                                                    | $C_{s, zero (post)}$   | 0.013               | 0.02                 | 0.5          | 0.43        | -0.3                                           |
| Upscale Gas Standard                                          | $C_{MA}$               | 21.99               | 18.22                | 125.6        | 48.0        | 52.4                                           |
| Initial Upscale                                               | $C_{v, up (pre)}$      | 22                  | 18.12                | 127.09       | 47.6        | 52.11                                          |
| Final Upscale                                                 | $C_{v, up (post)}$     | 22.01               | 18.14                | 126.9        | 47.75       | 52.3                                           |
| <b>System Bias - Results (Percent)</b>                        |                        |                     |                      |              |             |                                                |
| Zero (pre)                                                    | $SB_{i (zero)}$        | 0.1                 | 0.4                  | 0.4          | 0.6         | -0.2                                           |
| Zero (post)                                                   | $SB_{final (zero)}$    | 0.1                 | 0.4                  | 0.3          | 0.4         | -0.4                                           |
| Upscale (pre)                                                 | $SB_{i (upscale)}$     | -0.2                | -0.4                 | -0.3         | -0.4        | -0.2                                           |
| Upscale (post)                                                | $SB_{final (upscale)}$ | -0.1                | -0.3                 | -0.4         | -0.2        | -0.1                                           |
| Specification                                                 | $SB_{spec}$            | ±5                  | ±5                   | ±5           | ±5          | NA                                             |
| <b>System Drift - Results (Percent)</b>                       |                        |                     |                      |              |             |                                                |
| Zero                                                          | $D_{zero}$             | 0.0                 | 0.1                  | 0.1          | 0.2         | -0.3                                           |
| Upscale                                                       | $D_{upscale}$          | 0.0                 | 0.1                  | 0.1          | 0.2         | 0.2                                            |
| Specification                                                 | $D_{spec}$             | ±3                  | 3.0                  | 3.0          | 3.0         | ±3                                             |
| <b>Response Test - Results (seconds)</b>                      |                        |                     |                      |              |             |                                                |
| Upscale Test                                                  |                        | 35                  | 30                   | 35           | 30          | NA                                             |
| Zero Test                                                     |                        | 35                  | 30                   | 35           | 30          | NA                                             |
| Response Time                                                 |                        | 35                  | 30                   | 35           | 30          | 25                                             |
| <b>Calibration Correction</b>                                 |                        |                     |                      |              |             |                                                |
| Raw Average                                                   | $C_{ave}$              | 20.84               | 0.03                 | 12.9         | 1.31        | 7.32                                           |
| Bias Average - Zero                                           | $C_0$                  | 0.02                | 0.01                 | 0.64         | 0.52        | N/A                                            |
| Bias Average - Upscale                                        | $C_M$                  | 22.01               | 18.13                | 127.00       | 47.68       | N/A                                            |
| Corrected Run Average                                         | $C_{Gas}$              | <b>20.83</b>        | <b>0.01</b>          | <b>12.14</b> | <b>0.81</b> | <b>7.3</b>                                     |

THC analyzer lost power at 1144. Powered on at 1156. Cal check 1212: zero std = 0.2; 52.38 std = 5

**Test Run 1 Begin. STRATA Version 3.2.112****Operator: David Goshaw****Plant Name: Enviva Greenwood****Location: PC North Exhaust (RCO2)**

| Start Averaging |          | O2<br>% | CO2<br>ppm | THC<br>ppm | NOx<br>ppm | CO<br>ppm |
|-----------------|----------|---------|------------|------------|------------|-----------|
| 1/16/2019       | 9:45:37  | 20.845  | 0.013      | 9.89       | 1.62       | 12.89     |
| 1/16/2019       | 9:46:37  | 20.818  | 0.013      | 9.87       | 1.57       | 13.2      |
| 1/16/2019       | 9:47:38  | 20.819  | 0.013      | 8.27       | 1.64       | 13.48     |
| 1/16/2019       | 9:48:38  | 20.83   | 0.012      | 7.67       | 1.71       | 13.52     |
| 1/16/2019       | 9:49:38  | 20.833  | 0.013      | 7.46       | 1.66       | 13.43     |
| 1/16/2019       | 9:50:38  | 20.828  | 0.013      | 9.09       | 1.6        | 12.71     |
| 1/16/2019       | 9:51:38  | 20.82   | 0.012      | 9.94       | 1.6        | 13.41     |
| 1/16/2019       | 9:52:38  | 20.822  | 0.012      | 7.23       | 1.66       | 13.31     |
| 1/16/2019       | 9:53:38  | 20.838  | 0.012      | 7.71       | 1.68       | 12.61     |
| 1/16/2019       | 9:54:37  | 20.845  | 0.012      | 9.56       | 1.64       | 12.82     |
| 1/16/2019       | 9:55:37  | 20.825  | 0.012      | 9.65       | 1.58       | 12.8      |
| 1/16/2019       | 9:56:37  | 20.83   | 0.011      | 8.83       | 1.61       | 13.21     |
| 1/16/2019       | 9:57:38  | 20.831  | 0.012      | 7.71       | 1.67       | 13.29     |
| 1/16/2019       | 9:58:38  | 20.834  | 0.012      | 7.23       | 1.65       | 13.1      |
| 1/16/2019       | 9:59:38  | 20.839  | 0.011      | 9.53       | 1.6        | 12.53     |
| 1/16/2019       | 10:00:38 | 20.829  | 0.011      | 9.98       | 1.56       | 13.27     |
| 1/16/2019       | 10:01:38 | 20.83   | 0.012      | 7.48       | 1.62       | 13.23     |
| 1/16/2019       | 10:02:38 | 20.84   | 0.011      | 8.48       | 1.67       | 12.69     |
| 1/16/2019       | 10:03:38 | 20.85   | 0.011      | 9.61       | 1.62       | 12.96     |
| 1/16/2019       | 10:04:38 | 20.836  | 0.011      | 10.06      | 1.56       | 12.84     |
| 1/16/2019       | 10:05:38 | 20.84   | 0.012      | 9.98       | 1.6        | 13.5      |
| 1/16/2019       | 10:06:38 | 20.836  | 0.011      | 8.13       | 1.66       | 13.7      |
| 1/16/2019       | 10:07:38 | 20.842  | 0.012      | 7.16       | 1.65       | 13.31     |
| 1/16/2019       | 10:08:38 | 20.846  | 0.012      | 10.51      | 1.6        | 12.99     |
| 1/16/2019       | 10:09:37 | 20.83   | 0.011      | 10.65      | 1.56       | 13.69     |
| 1/16/2019       | 10:10:37 | 20.805  | 0.012      | 7.64       | 1.62       | 13.55     |
| 1/16/2019       | 10:11:37 | 20.84   | 0.012      | 9.25       | 1.72       | 13.06     |
| 1/16/2019       | 10:12:37 | 20.853  | 0.012      | 9.41       | 1.67       | 13.22     |
| 1/16/2019       | 10:13:37 | 20.843  | 0.012      | 9.87       | 1.61       | 12.75     |
| 1/16/2019       | 10:14:37 | 20.835  | 0.012      | 10.48      | 1.6        | 13.53     |
| 1/16/2019       | 10:15:37 | 20.835  | 0.012      | 7.99       | 1.66       | 13.78     |
| 1/16/2019       | 10:16:38 | 20.843  | 0.012      | 7.15       | 1.68       | 13.11     |
| 1/16/2019       | 10:17:38 | 20.852  | 0.011      | 10.63      | 1.61       | 12.93     |
| 1/16/2019       | 10:18:37 | 20.833  | 0.011      | 10.32      | 1.57       | 13.39     |
| 1/16/2019       | 10:19:37 | 20.812  | 0.012      | 7.94       | 1.64       | 13.36     |
| 1/16/2019       | 10:20:38 | 20.844  | 0.012      | 8.98       | 1.71       | 13        |
| Pause           |          |         |            |            |            |           |
| 1/16/2019       | 10:21:38 | 20.895  | 0.012      | 6.43       | 1.63       | 12.78     |
| 1/16/2019       | 10:22:38 | 20.863  | 0.012      | 8.61       | 1.22       | 9.32      |
| End Pause       |          |         |            |            |            |           |
| 1/16/2019       | 10:23:38 | 20.847  | 0.012      | 10.43      | 1.59       | 12.71     |
| 1/16/2019       | 10:24:38 | 20.843  | 0.012      | 7.74       | 1.66       | 13.49     |
| 1/16/2019       | 10:25:37 | 20.851  | 0.011      | 7.34       | 1.67       | 12.72     |

**Test Run 1 Begin. STRATA Version 3.2.112****Operator: David Goshaw****Plant Name: Enviva Greenwood****Location: PC North Exhaust (RCO2)**

|                |                 | <b>O2</b>     | <b>CO2</b>   | <b>THC</b>  | <b>NOx</b>  | <b>CO</b>    |
|----------------|-----------------|---------------|--------------|-------------|-------------|--------------|
| 1/16/2019      | 10:26:37        | 20.854        | 0.012        | 9.85        | 1.64        | 12.97        |
| 1/16/2019      | 10:27:37        | 20.845        | 0.011        | 9.8         | 1.58        | 13.64        |
| 1/16/2019      | 10:28:37        | 20.839        | 0.011        | 8.07        | 1.63        | 14.04        |
| 1/16/2019      | 10:29:37        | 20.848        | 0.012        | 7.54        | 1.69        | 14.17        |
| 1/16/2019      | 10:30:38        | 20.853        | 0.012        | 7.53        | 1.66        | 14.37        |
| 1/16/2019      | 10:31:38        | 20.843        | 0.012        | 8.56        | 1.61        | 14.24        |
| 1/16/2019      | 10:32:37        | 20.838        | 0.01         | 9.07        | 1.59        | 15.36        |
| 1/16/2019      | 10:33:38        | 20.842        | 0.012        | 6.72        | 1.67        | 15.31        |
| 1/16/2019      | 10:34:38        | 20.849        | 0.012        | 6.48        | 1.7         | 14.43        |
| 1/16/2019      | 10:35:38        | 20.858        | 0.011        | 8.11        | 1.63        | 14.57        |
| 1/16/2019      | 10:36:38        | 20.84         | 0.011        | 8.19        | 1.58        | 14.95        |
| 1/16/2019      | 10:37:38        | 20.823        | 0.011        | 7.25        | 1.64        | 15.14        |
| 1/16/2019      | 10:38:38        | 20.843        | 0.011        | 6.6         | 1.71        | 14.69        |
| 1/16/2019      | 10:39:38        | 20.86         | 0.011        | 6.42        | 1.67        | 14.2         |
| 1/16/2019      | 10:40:38        | 20.856        | 0.012        | 7.99        | 1.6         | 13.78        |
| 1/16/2019      | 10:41:37        | 20.853        | 0.012        | 8.2         | 1.57        | 14.75        |
| 1/16/2019      | 10:42:37        | 20.852        | 0.011        | 6.01        | 1.62        | 14.67        |
| 1/16/2019      | 10:43:37        | 20.862        | 0.011        | 6.08        | 1.65        | 13.7         |
| 1/16/2019      | 10:44:37        | 20.868        | 0.011        | 7.18        | 1.6         | 13.88        |
| 1/16/2019      | 10:45:38        | 20.85         | 0.012        | 7.39        | 1.56        | 14.08        |
| 1/16/2019      | 10:46:38        | 20.854        | 0.011        | 6.98        | 1.6         | 14.6         |
| 1/16/2019      | 10:47:38        | 20.856        | 0.011        | 5.66        | 1.66        | 14.33        |
| 1/16/2019      | 10:48:38        | 20.862        | 0.012        | 5.58        | 1.65        | 13.65        |
| 1/16/2019      | 10:49:38        | 20.864        | 0.012        | 7.82        | 1.6         | 13.38        |
| 1/16/2019      | 10:50:38        | 20.86         | 0.012        | 7.86        | 1.56        | 14.31        |
| 1/16/2019      | 10:51:38        | 20.855        | 0.012        | 5.94        | 1.63        | 14.33        |
| 1/16/2019      | 10:52:38        | 20.862        | 0.013        | 5.83        | 1.66        | 13.64        |
| <b>Average</b> | <b>2963 sam</b> | <b>20.842</b> | <b>0.012</b> | <b>8.24</b> | <b>1.63</b> | <b>13.61</b> |

**Test Run 1 End**

**Test Run 12 Begin. STRATA Version 3.2.112****Operator: David Goshaw****Plant Nam Enviva Greenwood****Location: PC North Exhaust (S6)**

| Start Averaging |          | O2<br>% | CO2<br>ppm | THC<br>ppm | NOx<br>ppm | CO<br>ppm |
|-----------------|----------|---------|------------|------------|------------|-----------|
| 1/16/2019       | 12:30:07 | 20.827  | 0.009      | 7.31       | 1.26       | 12.41     |
| 1/16/2019       | 12:31:07 | 20.836  | 0.014      | 8.17       | 1.32       | 13.32     |
| 1/16/2019       | 12:32:06 | 20.831  | -0.018     | 6.38       | 1.37       | 13.09     |
| 1/16/2019       | 12:33:06 | 20.838  | 0.002      | 5.91       | 1.37       | 12.7      |
| 1/16/2019       | 12:34:07 | 20.846  | -0.005     | 8.96       | 1.32       | 12.63     |
| 1/16/2019       | 12:35:07 | 20.835  | 0.004      | 8.95       | 1.31       | 13.27     |
| 1/16/2019       | 12:36:07 | 20.838  | -0.001     | 6.32       | 1.37       | 13.01     |
| 1/16/2019       | 12:37:07 | 20.842  | 0.006      | 7.1        | 1.4        | 13.15     |
| 1/16/2019       | 12:38:07 | 20.846  | -0.016     | 6.86       | 1.35       | 12.95     |
| 1/16/2019       | 12:39:07 | 20.835  | -0.013     | 7.61       | 1.32       | 12.7      |
| 1/16/2019       | 12:40:06 | 20.836  | -0.012     | 8.53       | 1.33       | 13.32     |
| 1/16/2019       | 12:41:08 | 20.834  | -0.001     | 6.11       | 1.39       | 13.21     |
| 1/16/2019       | 12:42:07 | 20.847  | 0.041      | 5.84       | 1.41       | 12.65     |
| 1/16/2019       | 12:43:07 | 20.853  | 0          | 8.69       | 1.35       | 12.38     |
| 1/16/2019       | 12:44:07 | 20.844  | 0.01       | 8.85       | 1.33       | 12.97     |
| 1/16/2019       | 12:45:07 | 20.837  | 0.02       | 6.81       | 1.39       | 12.93     |
| 1/16/2019       | 12:46:07 | 20.842  | 0.004      | 6.93       | 1.43       | 12.83     |
| 1/16/2019       | 12:47:07 | 20.853  | 0.013      | 6.44       | 1.39       | 12.83     |
| 1/16/2019       | 12:48:07 | 20.842  | -0.016     | 7.76       | 1.34       | 12.38     |
| 1/16/2019       | 12:49:07 | 20.842  | 0.018      | 8.62       | 1.35       | 13.24     |
| 1/16/2019       | 12:50:07 | 20.838  | 0.035      | 6.21       | 1.38       | 12.91     |
| 1/16/2019       | 12:51:07 | 20.847  | -0.015     | 6.39       | 1.38       | 11.95     |
| 1/16/2019       | 12:52:07 | 20.861  | 0.027      | 8.49       | 1.33       | 12.6      |
| 1/16/2019       | 12:53:07 | 20.847  | 0.034      | 8.7        | 1.3        | 12.54     |
| 1/16/2019       | 12:54:07 | 20.853  | 0.011      | 7.47       | 1.34       | 12.86     |
| 1/16/2019       | 12:55:07 | 20.851  | 0.035      | 6.86       | 1.36       | 13.12     |
| 1/16/2019       | 12:56:07 | 20.848  | 0.021      | 6.25       | 1.32       | 12.98     |
| 1/16/2019       | 12:57:07 | 20.851  | 0.018      | 8.26       | 1.3        | 12.52     |
| 1/16/2019       | 12:58:07 | 20.85   | 0.02       | 8.91       | 1.28       | 13.56     |
| 1/16/2019       | 12:59:07 | 20.836  | 0.019      | 5.94       | 1.32       | 13.26     |
| 1/16/2019       | 13:00:07 | 20.847  | 0.016      | 6.47       | 1.33       | 12.78     |
| 1/16/2019       | 13:01:07 | 20.858  | 0.026      | 8.2        | 1.28       | 13.11     |
| 1/16/2019       | 13:02:07 | 20.846  | 0.042      | 8.49       | 1.24       | 12.97     |
| 1/16/2019       | 13:03:07 | 20.848  | 0.048      | 8.15       | 1.27       | 13.54     |
| 1/16/2019       | 13:04:06 | 20.839  | 0.046      | 6.65       | 1.31       | 13.56     |
| 1/16/2019       | 13:05:08 | 20.845  | 0.045      | 5.81       | 1.29       | 13.3      |
| 1/16/2019       | 13:06:07 | 20.847  | 0.025      | 8.62       | 1.25       | 12.8      |
| 1/16/2019       | 13:07:07 | 20.847  | 0.045      | 8.81       | 1.23       | 13.74     |
| 1/16/2019       | 13:08:07 | 20.829  | 0.017      | 6.01       | 1.28       | 13.33     |
| 1/16/2019       | 13:09:07 | 20.848  | 0.036      | 7.15       | 1.32       | 12.87     |
| 1/16/2019       | 13:10:07 | 20.857  | 0.049      | 7.41       | 1.28       | 13        |
| 1/16/2019       | 13:11:07 | 20.845  | 0.028      | 7.69       | 1.23       | 11.99     |
| 1/16/2019       | 13:12:07 | 20.848  | 0.01       | 8.28       | 1.24       | 12.43     |

**Test Run 12 Begin. STRATA Version 3.2.112****Operator: David Goshaw****Plant Nam Enviva Greenwood****Location: PC North Exhaust (S6)**

|                        |                 | <b>O2</b>     | <b>CO2</b>   | <b>THC</b>  | <b>NOx</b>  | <b>CO</b>    |
|------------------------|-----------------|---------------|--------------|-------------|-------------|--------------|
| 1/16/2019              | 13:13:07        | 20.842        | 0.033        | 6.02        | 1.29        | 12.8         |
| 1/16/2019              | 13:14:07        | 20.845        | 0.032        | 5.2         | 1.28        | 12.36        |
| 1/16/2019              | 13:15:07        | 20.853        | 0.031        | 8.63        | 1.23        | 12.45        |
| 1/16/2019              | 13:16:07        | 20.846        | 0.035        | 8.68        | 1.22        | 13.16        |
| 1/16/2019              | 13:17:07        | 20.846        | 0.042        | 5.97        | 1.27        | 13.13        |
| 1/16/2019              | 13:18:08        | 20.847        | 0.045        | 6.58        | 1.32        | 12.45        |
| 1/16/2019              | 13:19:07        | 20.852        | 0.043        | 6.58        | 1.28        | 12.62        |
| 1/16/2019              | 13:20:07        | 20.847        | 0.039        | 7.5         | 1.23        | 11.92        |
| 1/16/2019              | 13:21:07        | 20.84         | 0.046        | 8.64        | 1.25        | 13.02        |
| 1/16/2019              | 13:22:07        | 20.833        | 0.047        | 5.92        | 1.31        | 13.31        |
| 1/16/2019              | 13:23:07        | 20.843        | 0.056        | 5.32        | 1.34        | 12.62        |
| 1/16/2019              | 13:24:07        | 20.851        | 0.038        | 8.19        | 1.29        | 12.5         |
| 1/16/2019              | 13:25:07        | 20.845        | 0.036        | 8.23        | 1.25        | 12.69        |
| 1/16/2019              | 13:26:07        | 20.847        | 0.061        | 6.4         | 1.3         | 12.78        |
| 1/16/2019              | 13:27:07        | 20.848        | 0.036        | 7.08        | 1.32        | 12.32        |
| 1/16/2019              | 13:28:07        | 20.849        | 0.07         | 6.79        | 1.31        | 12.94        |
| 1/16/2019              | 13:29:07        | 20.843        | 0.072        | 7.94        | 1.28        | 12.07        |
| Pause                  |                 |               |              |             |             |              |
| <b>Average</b>         | <b>2651 sam</b> | <b>20.844</b> | <b>0.025</b> | <b>7.32</b> | <b>1.31</b> | <b>12.85</b> |
| <b>Test Run 12 End</b> |                 |               |              |             |             |              |



| Date           | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCI<br>(ppm) | SEC<br>(ppm) | Methan<br>ol<br>(ppm) | SEC<br>(ppm) | acetaldeh<br>yde<br>(ppm) | SEC<br>(ppm) |
|----------------|----------------------------|--------------|--------------|--------------|-----------------------|--------------|---------------------------|--------------|
| 12/6/2018 8:26 | 0.582                      | 0.055        | 0.216        | 0.068        | 0.002                 | 0.194        | 0.597                     | 0.224        |
| 12/6/2018 8:27 | 0.499                      | 0.054        | 0.221        | 0.066        | -0.005                | 0.193        | 0.628                     | 0.222        |
| 12/6/2018 8:28 | 0.388                      | 0.056        | 0.21         | 0.069        | 0.001                 | 0.191        | 0.403                     | 0.222        |
| 12/6/2018 8:29 | 0.613                      | 0.052        | 0.134        | 0.063        | 0.031                 | 0.193        | 0.523                     | 0.219        |
| 12/6/2018 8:30 | 0.602                      | 0.055        | 0.217        | 0.067        | 0.052                 | 0.191        | 0.229                     | 0.223        |
| 12/6/2018 8:31 | 0.449                      | 0.055        | 0.201        | 0.069        | -0.019                | 0.192        | 0.262                     | 0.225        |
| 12/6/2018 8:32 | 0.479                      | 0.053        | 0.197        | 0.065        | 0.028                 | 0.189        | 0.357                     | 0.225        |
| 12/6/2018 8:33 | 0.487                      | 0.053        | 0.214        | 0.065        | 0.071                 | 0.191        | 0.422                     | 0.221        |
| 12/6/2018 8:34 | 0.584                      | 0.056        | 0.236        | 0.07         | 0.043                 | 0.192        | 0.143                     | 0.228        |
| 12/6/2018 8:35 | 0.61                       | 0.052        | 0.214        | 0.064        | 0.021                 | 0.192        | 0.032                     | 0.218        |
| 12/6/2018 8:36 | 0.513                      | 0.057        | 0.175        | 0.069        | -0.002                | 0.193        | -0.098                    | 0.229        |
| 12/6/2018 8:37 | 0.448                      | 0.053        | 0.247        | 0.065        | 0.018                 | 0.193        | -0.054                    | 0.221        |
| 12/6/2018 8:38 | 0.71                       | 0.055        | 0.288        | 0.068        | 0.059                 | 0.192        | -0.373                    | 0.23         |
| 12/6/2018 8:39 | 0.648                      | 0.055        | 0.23         | 0.067        | 0.018                 | 0.193        | -0.164                    | 0.221        |
| 12/6/2018 8:40 | 0.421                      | 0.056        | 0.214        | 0.07         | 0.026                 | 0.192        | 0.433                     | 0.225        |
| 12/6/2018 8:41 | 0.482                      | 0.056        | 0.181        | 0.068        | 0.001                 | 0.192        | 0.563                     | 0.222        |
| 12/6/2018 8:42 | 0.478                      | 0.052        | 0.237        | 0.065        | 0.035                 | 0.19         | 0.128                     | 0.22         |
| 12/6/2018 8:43 | 0.616                      | 0.055        | 0.198        | 0.064        | 0.017                 | 0.193        | 0.076                     | 0.221        |
| 12/6/2018 8:44 | 0.652                      | 0.056        | 0.209        | 0.065        | 0.08                  | 0.192        | 0.222                     | 0.224        |
| 12/6/2018 8:45 | 0.444                      | 0.054        | 0.156        | 0.069        | 0.028                 | 0.192        | 0.118                     | 0.223        |
| 12/6/2018 8:46 | 0.508                      | 0.055        | 0.203        | 0.067        | 0.007                 | 0.192        | 0.037                     | 0.229        |
| 12/6/2018 8:47 | 0.596                      | 0.057        | 0.243        | 0.065        | 0.029                 | 0.191        | -0.588                    | 0.235        |
| 12/6/2018 8:48 | 0.663                      | 0.058        | 0.279        | 0.071        | 0.013                 | 0.194        | -0.71                     | 0.241        |
| 12/6/2018 8:49 | 0.537                      | 0.057        | 0.254        | 0.068        | 0.016                 | 0.194        | -0.62                     | 0.238        |
| 12/6/2018 8:50 | 0.525                      | 0.058        | 0.157        | 0.071        | 0.048                 | 0.194        | -0.528                    | 0.238        |
| 12/6/2018 8:51 | 0.492                      | 0.056        | 0.274        | 0.063        | 0.016                 | 0.194        | -0.493                    | 0.231        |
| 12/6/2018 8:52 | 0.639                      | 0.057        | 0.239        | 0.066        | 0.026                 | 0.193        | -0.711                    | 0.232        |
| 12/6/2018 8:53 | 0.666                      | 0.057        | 0.23         | 0.07         | 0.057                 | 0.191        | 0.579                     | 0.23         |
| 12/6/2018 8:54 | 0.497                      | 0.052        | 0.095        | 0.064        | 0.045                 | 0.194        | 0.456                     | 0.216        |
| 12/6/2018 8:55 | 0.471                      | 0.053        | 0.112        | 0.065        | 0.03                  | 0.192        | 0.493                     | 0.222        |
| 12/6/2018 8:56 | 0.583                      | 0.054        | 0.161        | 0.067        | 0.06                  | 0.193        | 0.045                     | 0.219        |
| 12/6/2018 8:57 | 0.656                      | 0.054        | 0.197        | 0.064        | 0.068                 | 0.195        | -0.021                    | 0.223        |
| 12/6/2018 8:58 | 0.527                      | 0.055        | 0.196        | 0.069        | 0.084                 | 0.196        | 0.026                     | 0.228        |
| 12/6/2018 8:59 | 0.51                       | 0.055        | 0.159        | 0.066        | 0.023                 | 0.195        | -0.06                     | 0.225        |
| 12/6/2018 9:00 | 0.451                      | 0.054        | 0.235        | 0.066        | 0.027                 | 0.194        | -0.11                     | 0.225        |
| 12/6/2018 9:01 | 0.632                      | 0.054        | 0.185        | 0.065        | 0.063                 | 0.196        | -0.285                    | 0.228        |
| 12/6/2018 9:02 | 0.714                      | 0.055        | 0.187        | 0.065        | 0.1                   | 0.198        | -0.272                    | 0.226        |
| 12/6/2018 9:03 | 0.571                      | 0.057        | 0.197        | 0.067        | 0.028                 | 0.196        | -0.743                    | 0.233        |
| 12/6/2018 9:04 | 0.549                      | 0.057        | 0.228        | 0.064        | 0.012                 | 0.198        | -0.303                    | 0.23         |
| 12/6/2018 9:05 | 0.664                      | 0.058        | 0.179        | 0.071        | 0.07                  | 0.196        | -0.691                    | 0.237        |
| 12/6/2018 9:06 | 0.68                       | 0.058        | 0.172        | 0.068        | 0.025                 | 0.194        | -0.542                    | 0.241        |
| 12/6/2018 9:07 | 0.566                      | 0.058        | 0.24         | 0.07         | 0.044                 | 0.19         | -0.544                    | 0.238        |
| 12/6/2018 9:08 | 0.402                      | 0.056        | 0.185        | 0.065        | 0.035                 | 0.187        | -0.389                    | 0.228        |
| 12/6/2018 9:09 | 0.464                      | 0.057        | 0.234        | 0.067        | 0.022                 | 0.185        | -0.411                    | 0.233        |
| 12/6/2018 9:10 | 0.647                      | 0.057        | 0.182        | 0.069        | 0.046                 | 0.186        | -0.587                    | 0.239        |
| 12/6/2018 9:11 | 0.56                       | 0.059        | 0.192        | 0.069        | 0.05                  | 0.185        | -0.414                    | 0.235        |
| 12/6/2018 9:12 | 0.461                      | 0.058        | 0.216        | 0.068        | 0.028                 | 0.186        | -0.699                    | 0.233        |
| 12/6/2018 9:13 | 0.53                       | 0.058        | 0.157        | 0.067        | 0.019                 | 0.185        | -0.851                    | 0.238        |
| 12/6/2018 9:14 | 0.62                       | 0.059        | 0.214        | 0.07         | 0.045                 | 0.183        | -0.501                    | 0.243        |
| 12/6/2018 9:15 | 0.525                      | 0.057        | 0.256        | 0.07         | 0.056                 | 0.186        | -0.525                    | 0.23         |
| 12/6/2018 9:16 | 0.576                      | 0.057        | 0.252        | 0.066        | 0.052                 | 0.187        | -0.646                    | 0.241        |
| 12/6/2018 9:17 | 0.487                      | 0.058        | 0.234        | 0.07         | 0.06                  | 0.186        | -0.775                    | 0.241        |

| Date            | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCl<br>(ppm) | SEC<br>(ppm) | Methan<br>ol<br>(ppm) | SEC<br>(ppm) | acetaldeh<br>yde<br>(ppm) | SEC<br>(ppm) |
|-----------------|----------------------------|--------------|--------------|--------------|-----------------------|--------------|---------------------------|--------------|
| 12/6/2018 9:18  | 0.362                      | 0.059        | 0.188        | 0.068        | 0.007                 | 0.187        | -0.724                    | 0.244        |
| 12/6/2018 9:19  | 0.605                      | 0.057        | 0.166        | 0.065        | 0.063                 | 0.187        | -0.49                     | 0.245        |
| 12/6/2018 9:20  | 0.668                      | 0.058        | 0.194        | 0.069        | 0.058                 | 0.186        | -0.978                    | 0.242        |
| 12/6/2018 9:21  | 0.496                      | 0.059        | 0.086        | 0.07         | -0.008                | 0.186        | -0.643                    | 0.251        |
| 12/6/2018 9:22  | 0.547                      | 0.06         | 0.233        | 0.071        | 0.005                 | 0.186        | -0.515                    | 0.251        |
| 12/6/2018 9:23  | 0.571                      | 0.056        | 0.137        | 0.066        | 0.026                 | 0.179        | -0.167                    | 0.225        |
| 12/6/2018 9:24  | 0.555                      | 0.056        | 0.107        | 0.07         | 0.057                 | 0.178        | 0.24                      | 0.224        |
| 12/6/2018 9:25  | 0.503                      | 0.055        | 0.142        | 0.066        | 0.075                 | 0.176        | 0.27                      | 0.219        |
| 12/6/2018 9:26  | 0.404                      | 0.056        | 0.127        | 0.068        | 0.073                 | 0.178        | 0.353                     | 0.221        |
| 12/6/2018 9:27  | 0.388                      | 0.054        | 0.186        | 0.067        | -0.006                | 0.176        | 0.402                     | 0.218        |
| 12/6/2018 9:28  | 0.532                      | 0.054        | 0.179        | 0.066        | 0.021                 | 0.174        | 0.14                      | 0.215        |
| 12/6/2018 9:29  | 0.57                       | 0.055        | 0.171        | 0.07         | 0.052                 | 0.173        | 0.226                     | 0.219        |
| 12/6/2018 9:30  | 0.545                      | 0.054        | 0.193        | 0.066        | 0.026                 | 0.175        | -0.021                    | 0.221        |
| 12/6/2018 9:31  | 0.513                      | 0.056        | 0.116        | 0.07         | 0.054                 | 0.173        | 0.24                      | 0.227        |
| 12/6/2018 9:32  | 0.441                      | 0.054        | 0.215        | 0.067        | 0.052                 | 0.172        | 0.28                      | 0.215        |
| 12/6/2018 9:33  | 0.516                      | 0.057        | 0.114        | 0.07         | 0.056                 | 0.173        | 0.342                     | 0.232        |
| 12/6/2018 9:34  | 0.543                      | 0.056        | 0.237        | 0.069        | 0.084                 | 0.172        | 0.198                     | 0.23         |
| 12/6/2018 9:35  | 0.429                      | 0.056        | 0.173        | 0.07         | 0.056                 | 0.175        | 0.276                     | 0.225        |
| 12/6/2018 9:36  | 0.417                      | 0.054        | 0.205        | 0.067        | 0.053                 | 0.173        | 0.149                     | 0.224        |
| 12/6/2018 9:37  | 0.603                      | 0.054        | 0.203        | 0.069        | 0.044                 | 0.173        | 0.381                     | 0.219        |
| 12/6/2018 9:38  | 0.534                      | 0.058        | 0.22         | 0.068        | 0.08                  | 0.172        | -0.002                    | 0.227        |
| 12/6/2018 9:39  | 0.49                       | 0.056        | 0.25         | 0.071        | 0.066                 | 0.173        | 0.21                      | 0.228        |
| 12/6/2018 9:40  | 0.434                      | 0.055        | 0.172        | 0.07         | 0.079                 | 0.172        | 0.153                     | 0.225        |
| 12/6/2018 9:41  | 0.44                       | 0.055        | 0.219        | 0.068        | 0.041                 | 0.171        | 0.108                     | 0.222        |
| 12/6/2018 9:42  | 0.532                      | 0.054        | 0.183        | 0.067        | 0.045                 | 0.173        | 0.247                     | 0.22         |
| 12/6/2018 9:43  | 0.512                      | 0.056        | 0.214        | 0.067        | 0.107                 | 0.17         | 0.058                     | 0.224        |
| 12/6/2018 9:44  | 0.356                      | 0.055        | 0.184        | 0.066        | 0.031                 | 0.17         | 0.148                     | 0.223        |
| 12/6/2018 9:45  | 0.332                      | 0.055        | 0.2          | 0.069        | 0.063                 | 0.171        | 0.114                     | 0.22         |
| 12/6/2018 9:46  | 0.502                      | 0.056        | 0.241        | 0.067        | 0.062                 | 0.17         | 0.364                     | 0.227        |
| 12/6/2018 9:47  | 0.549                      | 0.057        | 0.202        | 0.07         | 0.057                 | 0.17         | 0.274                     | 0.233        |
| 12/6/2018 9:48  | 0.428                      | 0.054        | 0.231        | 0.068        | 0.005                 | 0.171        | 0.484                     | 0.224        |
| 12/6/2018 9:49  | 0.464                      | 0.052        | 0.2          | 0.065        | 0.022                 | 0.175        | 0.09                      | 0.217        |
| 12/6/2018 9:50  | 0.437                      | 0.058        | 0.167        | 0.072        | 0.056                 | 0.176        | 0.287                     | 0.23         |
| 12/6/2018 9:51  | 0.569                      | 0.055        | 0.155        | 0.069        | 0.086                 | 0.178        | 0.426                     | 0.227        |
| 12/6/2018 9:52  | 0.559                      | 0.054        | 0.18         | 0.066        | 0.07                  | 0.179        | 0.631                     | 0.22         |
| 12/6/2018 9:53  | 0.407                      | 0.058        | 0.205        | 0.072        | 0.059                 | 0.181        | 0.416                     | 0.231        |
| 12/6/2018 9:54  | 0.434                      | 0.056        | 0.093        | 0.067        | 0.084                 | 0.18         | 0.49                      | 0.226        |
| 12/6/2018 9:55  | 0.58                       | 0.058        | 0.197        | 0.071        | 0.109                 | 0.179        | 0.383                     | 0.227        |
| 12/6/2018 9:56  | 0.621                      | 0.054        | 0.156        | 0.068        | 0.094                 | 0.193        | 0.589                     | 0.228        |
| 12/6/2018 9:57  | 0.694                      | 0.055        | 0.146        | 0.067        | 0.053                 | 0.202        | 0.453                     | 0.225        |
| 12/6/2018 9:58  | 0.644                      | 0.054        | 0.144        | 0.067        | 0.079                 | 0.202        | 0.346                     | 0.231        |
| 12/6/2018 9:59  | 0.456                      | 0.053        | 0.155        | 0.068        | 0.033                 | 0.675        | 0.025                     | 0.217        |
| 12/6/2018 10:00 | -0.013                     | 0.039        | 0.127        | 0.049        | -0.347                | 3.241        | -0.66                     | 0.153        |
| 12/6/2018 10:01 | -0.048                     | 0.032        | -0.01        | 0.041        | -0.4                  | 3.352        | -0.441                    | 0.133        |
| 12/6/2018 10:02 | -0.105                     | 0.032        | 0.014        | 0.039        | -0.416                | 3.358        | -0.536                    | 0.13         |
| 12/6/2018 10:03 | -0.07                      | 0.032        | 0.03         | 0.041        | -0.422                | 3.348        | -0.582                    | 0.132        |
| 12/6/2018 10:04 | -0.029                     | 0.03         | 0.012        | 0.039        | -0.262                | 1.194        | -0.201                    | 0.118        |
| 12/6/2018 10:05 | -0.043                     | 0.027        | -0.01        | 0.035        | 0.007                 | 0.054        | -0.022                    | 0.104        |
| 12/6/2018 10:06 | -0.064                     | 0.026        | -0.02        | 0.035        | -0.042                | 0.04         | -0.177                    | 0.115        |
| 12/6/2018 10:07 | -0.026                     | 0.027        | 0.01         | 0.036        | -0.003                | 0.037        | -0.358                    | 0.114        |
| 12/6/2018 10:08 | 0.109                      | 0.033        | 0.088        | 0.044        | 0.043                 | 0.059        | -0.157                    | 0.133        |
| 12/6/2018 10:09 | 0.509                      | 0.051        | 0.303        | 0.061        | 0.069                 | 0.109        | 0.208                     | 0.198        |

| Date            | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCI<br>(ppm) | SEC<br>(ppm) | Methan<br>ol<br>(ppm) | SEC<br>(ppm) | acetaldeh<br>yde<br>(ppm) | SEC<br>(ppm) |
|-----------------|----------------------------|--------------|--------------|--------------|-----------------------|--------------|---------------------------|--------------|
| 12/6/2018 10:10 | 0.074                      | 0.034        | 0.151        | 0.043        | 0.008                 | 0.036        | -0.238                    | 0.135        |
| 12/6/2018 10:11 | 0.008                      | 0.03         | -0.05        | 0.039        | 0.002                 | 0.034        | -0.229                    | 0.123        |
| 12/6/2018 10:12 | -0.179                     | 0.034        | -0.03        | 0.038        | 0.022                 | 0.039        | -0.098                    | 0.138        |
| 12/6/2018 10:13 | -0.246                     | 0.05         | -0.06        | 0.046        | 0.034                 | 0.045        | 0.381                     | 0.178        |
| 12/6/2018 10:14 | 0.192                      | 0.05         | 0.089        | 0.055        | 0.062                 | 0.089        | 0.376                     | 0.182        |
| 12/6/2018 10:15 | 0.74                       | 0.056        | 0.204        | 0.07         | 0.082                 | 0.183        | 0.408                     | 0.222        |
| 12/6/2018 10:16 | 0.4                        | 0.056        | 0.138        | 0.067        | 0.065                 | 0.18         | 0.705                     | 0.224        |
| 12/6/2018 10:17 | 0.352                      | 0.057        | 0.2          | 0.071        | 0.061                 | 0.178        | 0.375                     | 0.227        |
| 12/6/2018 10:19 | 0.574                      | 0.055        | 0.185        | 0.068        | 0.061                 | 0.179        | 0.125                     | 0.224        |
| 12/6/2018 10:20 | 0.513                      | 0.056        | 0.181        | 0.069        | 0.122                 | 0.176        | 0.045                     | 0.225        |
| 12/6/2018 10:21 | 0.39                       | 0.056        | 0.241        | 0.07         | 0.131                 | 0.177        | 0.378                     | 0.227        |
| 12/6/2018 10:22 | 0.437                      | 0.057        | 0.206        | 0.07         | 0.113                 | 0.178        | 0.141                     | 0.231        |
| 12/6/2018 10:23 | 0.452                      | 0.058        | 0.182        | 0.072        | 0.029                 | 0.176        | 0.153                     | 0.227        |
| 12/6/2018 10:24 | 0.534                      | 0.055        | 0.235        | 0.067        | 0.087                 | 0.176        | 0.316                     | 0.223        |
| 12/6/2018 10:25 | 0.574                      | 0.056        | 0.138        | 0.068        | 0.104                 | 0.178        | 0.262                     | 0.225        |
| 12/6/2018 10:26 | 0.48                       | 0.055        | 0.236        | 0.068        | 0.081                 | 0.179        | -0.072                    | 0.228        |
| 12/6/2018 10:27 | 0.473                      | 0.057        | 0.235        | 0.069        | 0.045                 | 0.178        | 0.017                     | 0.235        |
| 12/6/2018 10:28 | 0.556                      | 0.056        | 0.229        | 0.068        | 0.113                 | 0.176        | 0.199                     | 0.233        |
| 12/6/2018 10:29 | 0.577                      | 0.057        | 0.218        | 0.068        | 0.096                 | 0.176        | -0.213                    | 0.235        |
| 12/6/2018 10:30 | 0.469                      | 0.059        | 0.165        | 0.072        | 0.045                 | 0.177        | -0.223                    | 0.231        |
| 12/6/2018 10:31 | 0.522                      | 0.056        | 0.23         | 0.068        | 0.062                 | 0.176        | 0.025                     | 0.229        |
| 12/6/2018 10:32 | 0.453                      | 0.055        | 0.174        | 0.067        | 0.064                 | 0.177        | -0.16                     | 0.223        |
| 12/6/2018 10:33 | 0.639                      | 0.056        | 0.239        | 0.07         | 0.085                 | 0.178        | 0.057                     | 0.227        |
| 12/6/2018 10:34 | 0.61                       | 0.055        | 0.216        | 0.067        | 0.119                 | 0.176        | -0.053                    | 0.222        |
| 12/6/2018 10:35 | 0.473                      | 0.056        | 0.257        | 0.068        | 0.069                 | 0.176        | -0.049                    | 0.231        |
| 12/6/2018 10:36 | 0.433                      | 0.057        | 0.205        | 0.071        | 0.08                  | 0.177        | 0.021                     | 0.229        |
| 12/6/2018 10:37 | 0.565                      | 0.057        | 0.179        | 0.071        | 0.103                 | 0.176        | 0.27                      | 0.239        |
| 12/6/2018 10:38 | 0.605                      | 0.059        | 0.202        | 0.072        | 0.108                 | 0.177        | 0.022                     | 0.24         |
| 12/6/2018 10:39 | 0.536                      | 0.056        | 0.19         | 0.068        | 0.085                 | 0.177        | 0.213                     | 0.229        |
| 12/6/2018 10:40 | 0.524                      | 0.058        | 0.229        | 0.07         | 0.077                 | 0.177        | 0.077                     | 0.23         |
| 12/6/2018 10:41 | 0.522                      | 0.057        | 0.225        | 0.071        | 0.063                 | 0.177        | 0.129                     | 0.226        |
| 12/6/2018 10:42 | 0.582                      | 0.057        | 0.219        | 0.069        | 0.109                 | 0.174        | 0.211                     | 0.231        |
| 12/6/2018 10:43 | 0.566                      | 0.057        | 0.132        | 0.068        | 0.111                 | 0.176        | 0.257                     | 0.231        |
| 12/6/2018 10:44 | 0.402                      | 0.057        | 0.255        | 0.069        | 0.063                 | 0.178        | 0.106                     | 0.229        |
| 12/6/2018 10:45 | 0.502                      | 0.056        | 0.194        | 0.071        | 0.07                  | 0.176        | 0.083                     | 0.229        |
| 12/6/2018 10:46 | 0.527                      | 0.056        | 0.181        | 0.072        | 0.08                  | 0.175        | 0.323                     | 0.227        |
| 12/6/2018 10:47 | 0.552                      | 0.056        | 0.202        | 0.069        | 0.159                 | 0.176        | 0.277                     | 0.23         |
| 12/6/2018 10:48 | 0.555                      | 0.058        | 0.257        | 0.075        | 0.098                 | 0.177        | 0.349                     | 0.228        |
| 12/6/2018 10:49 | 0.498                      | 0.06         | 0.211        | 0.073        | 0.092                 | 0.178        | 0.34                      | 0.237        |
| 12/6/2018 10:50 | 0.418                      | 0.056        | 0.156        | 0.068        | 0.059                 | 0.171        | 0.251                     | 0.222        |
| 12/6/2018 10:51 | 0.572                      | 0.057        | 0.209        | 0.07         | 0.095                 | 0.165        | 0.423                     | 0.23         |
| 12/6/2018 10:52 | 0.609                      | 0.055        | 0.158        | 0.068        | 0.112                 | 0.165        | 0.205                     | 0.224        |
| 12/6/2018 10:53 | 0.422                      | 0.055        | 0.124        | 0.068        | 0.063                 | 0.178        | 0.532                     | 0.221        |
| 12/6/2018 10:54 | 0.461                      | 0.058        | 0.176        | 0.072        | 0.077                 | 0.185        | 1.098                     | 0.235        |
| 12/6/2018 10:55 | 0.563                      | 0.057        | 0.09         | 0.07         | 0.114                 | 0.191        | 1.069                     | 0.232        |
| 12/6/2018 10:56 | 0.626                      | 0.057        | 0.095        | 0.072        | 0.132                 | 0.195        | 1.147                     | 0.232        |
| 12/6/2018 10:57 | 0.623                      | 0.055        | 0.112        | 0.07         | 0.134                 | 0.195        | 1.033                     | 0.234        |
| 12/6/2018 10:58 | 0.539                      | 0.056        | 0.113        | 0.067        | 0.125                 | 0.197        | 1.015                     | 0.235        |
| 12/6/2018 10:59 | 0.467                      | 0.057        | 0.116        | 0.072        | 0.094                 | 0.197        | 0.982                     | 0.235        |
| 12/6/2018 11:00 | 0.642                      | 0.059        | 0.091        | 0.069        | 0.149                 | 0.198        | 1.049                     | 0.239        |
| 12/6/2018 11:01 | 0.75                       | 0.055        | 0.115        | 0.067        | 0.174                 | 0.198        | 0.853                     | 0.232        |
| 12/6/2018 11:02 | 0.479                      | 0.057        | 0.12         | 0.07         | 0.102                 | 0.2          | 0.992                     | 0.237        |

| Date            | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCI<br>(ppm) | SEC<br>(ppm) | Methan<br>ol<br>(ppm) | SEC<br>(ppm) | acetaldeh<br>yde<br>(ppm) | SEC<br>(ppm) |
|-----------------|----------------------------|--------------|--------------|--------------|-----------------------|--------------|---------------------------|--------------|
| 12/6/2018 11:03 | 0.609                      | 0.058        | 0.164        | 0.073        | 0.111                 | 0.2          | 1.167                     | 0.242        |
| 12/6/2018 11:04 | 0.644                      | 0.057        | 0.058        | 0.071        | 0.146                 | 0.2          | 1.148                     | 0.238        |
| 12/6/2018 11:05 | 0.663                      | 0.057        | 0.056        | 0.07         | 0.121                 | 0.2          | 1.137                     | 0.234        |
| 12/6/2018 11:06 | 0.708                      | 0.056        | 0.079        | 0.07         | 0.158                 | 0.198        | 0.996                     | 0.232        |
| 12/6/2018 11:07 | 0.516                      | 0.058        | 0.11         | 0.07         | 0.091                 | 0.2          | 0.986                     | 0.238        |
| 12/6/2018 11:08 | 0.504                      | 0.056        | 0.045        | 0.069        | 0.087                 | 0.198        | 0.999                     | 0.232        |
| 12/6/2018 11:09 | 0.693                      | 0.056        | 0.083        | 0.069        | 0.15                  | 0.191        | 0.781                     | 0.229        |
| 12/6/2018 11:10 | 0.654                      | 0.057        | 0.121        | 0.068        | 0.156                 | 0.188        | 0.827                     | 0.233        |
| 12/6/2018 11:11 | 0.568                      | 0.057        | 0.174        | 0.069        | 0.113                 | 0.192        | 0.815                     | 0.232        |
| 12/6/2018 11:12 | 0.648                      | 0.058        | 0.173        | 0.071        | 0.09                  | 0.191        | 0.972                     | 0.235        |
| 12/6/2018 11:13 | 0.584                      | 0.057        | 0.144        | 0.071        | 0.077                 | 0.187        | 1.033                     | 0.239        |
| 12/6/2018 11:14 | 0.674                      | 0.054        | 0.097        | 0.066        | 0.117                 | 0.188        | 0.816                     | 0.224        |
| 12/6/2018 11:15 | 0.616                      | 0.056        | 0.129        | 0.067        | 0.113                 | 0.188        | 0.874                     | 0.231        |
| 12/6/2018 11:16 | 0.477                      | 0.057        | 0.162        | 0.07         | 0.109                 | 0.188        | 0.802                     | 0.233        |
| 12/6/2018 11:17 | 0.463                      | 0.057        | 0.116        | 0.07         | 0.143                 | 0.188        | 0.728                     | 0.231        |
| 12/6/2018 11:18 | 0.657                      | 0.058        | 0.158        | 0.071        | 0.164                 | 0.188        | 0.711                     | 0.238        |
| 12/6/2018 11:19 | 0.678                      | 0.058        | 0.128        | 0.072        | 0.14                  | 0.19         | 0.79                      | 0.242        |
| 12/6/2018 11:20 | 0.49                       | 0.056        | 0.117        | 0.073        | 0.062                 | 0.189        | 1.053                     | 0.232        |
| 12/6/2018 11:21 | 0.565                      | 0.056        | 0.146        | 0.067        | 0.095                 | 0.187        | 0.728                     | 0.231        |
| 12/6/2018 11:22 | 0.52                       | 0.056        | 0.186        | 0.071        | 0.092                 | 0.188        | 0.753                     | 0.229        |
| 12/6/2018 11:23 | 0.63                       | 0.057        | 0.098        | 0.073        | 0.155                 | 0.189        | 1.055                     | 0.231        |
| 12/6/2018 11:24 | 0.647                      | 0.057        | 0.158        | 0.071        | 0.13                  | 0.191        | 1.11                      | 0.23         |
| 12/6/2018 11:25 | 0.418                      | 0.057        | 0.22         | 0.07         | 0.106                 | 0.191        | 1.143                     | 0.233        |
| 12/6/2018 11:26 | 0.461                      | 0.055        | 0.147        | 0.067        | 0.105                 | 0.189        | 1.355                     | 0.23         |
| 12/6/2018 11:27 | 0.521                      | 0.056        | 0.204        | 0.067        | 0.128                 | 0.183        | 1.125                     | 0.228        |
| 12/6/2018 11:28 | 0.517                      | 0.056        | 0.172        | 0.068        | 0.125                 | 0.173        | 1.434                     | 0.231        |
| 12/6/2018 11:29 | 0.5                        | 0.055        | 0.207        | 0.067        | 0.122                 | 0.171        | 1.195                     | 0.229        |
| 12/6/2018 11:30 | 0.411                      | 0.057        | 0.26         | 0.072        | 0.109                 | 0.168        | 1.539                     | 0.23         |
| 12/6/2018 11:31 | 0.493                      | 0.058        | 0.197        | 0.071        | 0.127                 | 0.167        | 1.157                     | 0.231        |
| 12/6/2018 11:32 | 0.549                      | 0.058        | 0.2          | 0.072        | 0.113                 | 0.169        | 1.241                     | 0.23         |
| 12/6/2018 11:33 | 0.522                      | 0.058        | 0.177        | 0.068        | 0.113                 | 0.165        | 1.344                     | 0.226        |
| 12/6/2018 11:34 | 0.365                      | 0.058        | 0.26         | 0.072        | 0.095                 | 0.165        | 1.397                     | 0.227        |
| 12/6/2018 11:35 | 0.398                      | 0.056        | 0.251        | 0.068        | 0.101                 | 0.167        | 1.396                     | 0.226        |
| 12/6/2018 11:36 | 0.465                      | 0.057        | 0.212        | 0.07         | 0.119                 | 0.164        | 1.239                     | 0.226        |
| 12/6/2018 11:37 | 0.488                      | 0.057        | 0.168        | 0.069        | 0.136                 | 0.167        | 1.191                     | 0.229        |
| 12/6/2018 11:38 | 0.524                      | 0.058        | 0.166        | 0.069        | 0.125                 | 0.166        | 1.347                     | 0.235        |
| 12/6/2018 11:39 | 0.383                      | 0.056        | 0.232        | 0.069        | 0.185                 | 0.166        | 1.414                     | 0.23         |
| 12/6/2018 11:40 | 0.327                      | 0.058        | 0.206        | 0.071        | 0.124                 | 0.166        | 1.236                     | 0.232        |
| 12/6/2018 11:41 | 0.523                      | 0.058        | 0.281        | 0.069        | 0.154                 | 0.168        | 1.396                     | 0.23         |
| 12/6/2018 11:42 | 0.525                      | 0.059        | 0.263        | 0.074        | 0.152                 | 0.165        | 1.26                      | 0.235        |
| 12/6/2018 11:43 | 0.424                      | 0.058        | 0.246        | 0.069        | 0.105                 | 0.166        | 1.447                     | 0.234        |
| 12/6/2018 11:44 | 0.482                      | 0.059        | 0.282        | 0.071        | 0.155                 | 0.166        | 1.251                     | 0.234        |
| 12/6/2018 11:45 | 0.507                      | 0.059        | 0.222        | 0.072        | 0.17                  | 0.166        | 1.309                     | 0.235        |
| 12/6/2018 11:46 | 0.481                      | 0.06         | 0.214        | 0.075        | 0.122                 | 0.166        | 1.506                     | 0.237        |
| 12/6/2018 11:47 | 0.378                      | 0.059        | 0.215        | 0.073        | 0.124                 | 0.166        | 1.518                     | 0.239        |
| 12/6/2018 11:48 | 0.386                      | 0.056        | 0.255        | 0.066        | 0.13                  | 0.166        | 1.388                     | 0.227        |
| 12/6/2018 11:49 | 0.325                      | 0.059        | 0.203        | 0.072        | 0.151                 | 0.167        | 1.565                     | 0.234        |
| 12/6/2018 11:50 | 0.511                      | 0.058        | 0.214        | 0.067        | 0.17                  | 0.167        | 1.348                     | 0.234        |
| 12/6/2018 11:51 | 0.498                      | 0.056        | 0.211        | 0.072        | 0.15                  | 0.167        | 1.327                     | 0.23         |
| 12/6/2018 11:52 | 0.339                      | 0.057        | 0.242        | 0.07         | 0.131                 | 0.168        | 1.641                     | 0.228        |
| 12/6/2018 11:53 | 0.427                      | 0.059        | 0.25         | 0.071        | 0.144                 | 0.168        | 1.502                     | 0.238        |
| 12/6/2018 11:54 | 0.462                      | 0.057        | 0.207        | 0.069        | 0.146                 | 0.168        | 1.372                     | 0.232        |

| Date            | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCl<br>(ppm) | SEC<br>(ppm) | Methan<br>ol<br>(ppm) | SEC<br>(ppm) | acetaldeh<br>yde<br>(ppm) | SEC<br>(ppm) |
|-----------------|----------------------------|--------------|--------------|--------------|-----------------------|--------------|---------------------------|--------------|
| 12/6/2018 11:55 | 0.518                      | 0.059        | 0.178        | 0.072        | 0.129                 | 0.168        | 1.379                     | 0.241        |
| 12/6/2018 11:56 | 0.532                      | 0.06         | 0.211        | 0.074        | 0.17                  | 0.167        | 1.448                     | 0.242        |
| 12/6/2018 11:57 | 0.42                       | 0.059        | 0.212        | 0.073        | 0.157                 | 0.168        | 1.431                     | 0.243        |
| 12/6/2018 11:58 | 0.382                      | 0.059        | 0.167        | 0.072        | 0.148                 | 0.166        | 1.611                     | 0.236        |
| 12/6/2018 11:59 | 0.533                      | 0.059        | 0.321        | 0.072        | 0.198                 | 0.165        | 1.53                      | 0.236        |

| Date    | Time | CTS Scan<br>(pathlength) | SEC<br>(ppm) | Cell<br>Pressure<br>(psi) | Cell Temp<br>(deg C) | Deviation<br>from<br>Previous | Deviation from<br>Average |
|---------|------|--------------------------|--------------|---------------------------|----------------------|-------------------------------|---------------------------|
| 5-Dec   | 730  | 7.98                     | 0.111        | 14.7                      | 181                  | NA                            | 0.0%                      |
|         |      |                          |              |                           |                      | 100.0%                        | 100.0%                    |
| Average |      | 7.980                    | 0.111        |                           |                      |                               |                           |

| Date   | Time          | Direct Spike Results, Spike <sub>dir</sub> |           | System Spiked Result |           | Native Concentrations, Unspike |           | Dilution, DF | Expected Spike Concentration, CS | Recovery |
|--------|---------------|--------------------------------------------|-----------|----------------------|-----------|--------------------------------|-----------|--------------|----------------------------------|----------|
|        |               | (ppm HCl)                                  | (ppm SF6) | (ppm HCl)            | (ppm SF6) | (ppm HCl)                      | (ppm SF6) |              |                                  |          |
| 15-Jan | 1530/<br>1633 | 45.63                                      | 2.21      | 3.391                | 0.198     | 0.153                          | -0.001    | 9.0%         | 4.2                              | 79.8%    |
|        |               |                                            |           |                      |           |                                |           |              |                                  |          |
|        |               |                                            |           |                      |           |                                |           |              |                                  |          |

| Enviva - Greenwood        |                                         | RCO2 (North) |           |           |         |
|---------------------------|-----------------------------------------|--------------|-----------|-----------|---------|
| Parameters                | Units                                   | Run 3        | Run 4     | Run 5     | Average |
| Date                      |                                         | 16-Jan-19    | 16-Jan-19 | 16-Jan-19 |         |
| Run Time                  |                                         | 1407-1523    | 1545-1657 | 1837-2001 |         |
| Oxygen                    | %                                       | 20.84        | 20.89     | 20.86     | 20.87   |
| Moisture                  | %                                       | 5.12         | 5.02      | 4.54      | 4.90    |
| Volumetric Flow Rate, Std | DSCFM                                   | 22,698       | 22,867    | 22,202    | 22,589  |
| Process Rate              | ODT/hr                                  | 25.1         | 25.2      | 22.9      | 24.4    |
| VOC Emissions             | Units                                   | Run 1        | Run 2     | Run 3     | Average |
| Concentration (actual)    | ppmv <sub>w</sub> as C <sub>3</sub>     | 6.93         | 7.53      | 6.71      | 7.06    |
| Concentration (dry)       | ppmv <sub>d</sub> as C <sub>3</sub>     | 7.30         | 7.93      | 7.03      | 7.42    |
| Emission Rate (propane)   | lb/hr as C <sub>3</sub> H <sub>8</sub>  | 1.1          | 1.2       | 1.1       | 1.2     |
| Emission Factor (propane) | lb/ODT as C <sub>3</sub> H <sub>8</sub> | 0.045        | 0.049     | 0.047     | 0.047   |
| NOx Emissions             | Units                                   | Run 1        | Run 2     | Run 3     | Average |
| Concentration (dry)       | ppm <sub>vd</sub>                       | 0.87         | 0.95      | 1.01      | 0.94    |
| Emission Rate             | lb/hr                                   | 0.14         | 0.16      | 0.16      | 0.15    |
| Emission Factor           | lb/ODT                                  | 0.0056       | 0.0062    | 0.0070    | 0.0063  |
| CO Emissions              | Units                                   | Run 1        | Run 2     | Run 3     | Average |
| Concentration (dry)       | ppm <sub>vd</sub>                       | 11.36        | 10.26     | 9.52      | 10.38   |
| Emission Rate             | lb/hr                                   | 1.1          | 1.0       | 0.92      | 1.0     |
| Emission Factor           | lb/ODT                                  | 0.045        | 0.041     | 0.040     | 0.042   |



Facility: Enviva - Greenwood  
Date: 1/16/19

Source: RCO2 (North)

| HAP             |            | Methanol          | Ace-<br>taldehyde   | Form-<br>aldehyde | HCl                           |                                                 |
|-----------------|------------|-------------------|---------------------|-------------------|-------------------------------|-------------------------------------------------|
| Formula         |            | CH <sub>4</sub> O | CH <sub>3</sub> CHO | CH <sub>2</sub> O | C <sub>6</sub> H <sub>6</sub> |                                                 |
| Mol Weight      | lb/lb mole | 32.04             | 44.05               | 30.31             | 36.46                         |                                                 |
| Response Factor |            | 0.65              | 1.00                | 0.00              | 0.00                          |                                                 |
| Run 3           |            |                   |                     |                   |                               |                                                 |
| Conc            | ppm wet    | 0.00              | 0.00                | 0.44              | 0.00                          | 5.12 % Moisture<br>22,698 DSCFM<br>25.10 ODT/hr |
| Conc            | ppm dry    | 0.00              | 0.00                | 0.46              | 0.00                          |                                                 |
| Mass Emissions  | lb/hr      | 0.00              | 0.00                | 0.049             | 0.00                          |                                                 |
| Emission Factor | lb/ODT     | 0.00              | 0.00                | 0.0020            | 0.00                          |                                                 |
| Run 4           |            |                   |                     |                   |                               |                                                 |
| Conc            | ppm wet    | 0.00              | 0.00                | 0.44              | 0.00                          | 5.02 % Moisture<br>22,867 DSCFM<br>25.20 ODT/hr |
| Conc            | ppm dry    | 0.00              | 0.00                | 0.46              | 0.00                          |                                                 |
| Mass Emissions  | lb/hr      | 0.00              | 0.00                | 0.050             | 0.00                          |                                                 |
| Emission Factor | lb/ODT     | 0.00              | 0.00                | 0.0020            | 0.00                          |                                                 |
| Run 5           |            |                   |                     |                   |                               |                                                 |
| Conc            | ppm wet    | 0.00              | 0.00                | 0.72              | 0.00                          | 4.54 % Moisture<br>22,202 DSCFM<br>22.90 ODT/hr |
| Conc            | ppm dry    | 0.00              | 0.00                | 0.76              | 0.00                          |                                                 |
| Mass Emissions  | lb/hr      | 0.00              | 0.00                | 0.080             | 0.00                          |                                                 |
| Emission Factor | lb/ODT     | 0.00              | 0.00                | 0.0035            | 0.00                          |                                                 |
| Averages        |            |                   |                     |                   |                               |                                                 |
| Conc            | ppm wet    | 0.00              | 0.00                | 0.53              | 0.00                          | 4.90 % Moisture<br>22,589 DSCFM                 |
| Conc            | ppm dry    | 0.00              | 0.00                | 0.56              | 0.00                          |                                                 |
| Mass Emissions  | lb/hr      | 0.00              | 0.00                | 0.059             | 0.00                          |                                                 |
| Emission Factor | lb/ODT     | 0.00              | 0.00                | 0.0025            | 0.00                          |                                                 |
| ND values       |            |                   |                     |                   |                               |                                                 |

Enviva - Greenwood  
RCO2 (North)

Date: 16-Jan-19  
Run Time: 1407-1523

Run 3

| Parameter                                                     | Symbol                 | O <sub>2</sub><br>% | CO <sub>2</sub><br>% | CO<br>ppm    | NOx<br>ppm  | THC<br>ppm (as C <sub>3</sub> H <sub>8</sub> ) |
|---------------------------------------------------------------|------------------------|---------------------|----------------------|--------------|-------------|------------------------------------------------|
| <b>Analyzer Calibration Error - Calibration Standards</b>     |                        |                     |                      |              |             |                                                |
| Zero Gas                                                      | $C_{v, zero}$          | 0.0                 | 0.0                  | 0.0          | 0.0         | 0.0                                            |
| Low-Level Gas                                                 | $C_{v, low}$           | N/A                 | N/A                  | N/A          | N/A         | 25.25                                          |
| Mid-Level Gas                                                 | $C_{v, mid}$           | 11.05               | 9.952                | 125.6        | 48.0        | 52.38                                          |
| High-Level Gas                                                | $C_{v, high}$          | 21.99               | 18.22                | 226.4        | 89.5        | 85.84                                          |
| Calibration Span                                              | CS                     | 21.99               | 18.22                | 226.4        | 89.5        | 100                                            |
| <b>Analyzer Calibration Error - Instrument Response</b>       |                        |                     |                      |              |             |                                                |
| Zero Gas                                                      | $C_{Dir, zero}$        | 0.00                | -0.06                | -0.07        | 0.0         | 0.1                                            |
| Low-Level Gas                                                 | $C_{Dir, low}$         | N/A                 | N/A                  | N/A          | N/A         | 26.1                                           |
| Mid-Level Gas                                                 | $C_{Dir, mid}$         | 11.075              | 9.989                | 127.7        | 47.96       | 52.35                                          |
| High-Level Gas                                                | $C_{Dir, high}$        | 22.04               | 18.20                | 227.35       | 89.6        | 85.8                                           |
| <b>Analyzer Calibration Error - Results (Percent of Span)</b> |                        |                     |                      |              |             |                                                |
| Zero Gas                                                      | $ACE_{zero}$           | 0.0                 | -0.3                 | 0.0          | 0.0         | 0.1                                            |
| Low-Level Gas                                                 | $ACE_{low}$            | N/A                 | N/A                  | N/A          | N/A         | 3.4                                            |
| Mid-Level Gas                                                 | $ACE_{mid}$            | 0.1                 | 0.2                  | 0.9          | 0.0         | -0.1                                           |
| High-Level Gas                                                | $ACE_{high}$           | 0.2                 | -0.1                 | 0.4          | 0.1         | 0.0                                            |
| Specification                                                 | $ACE_{spec}$           | ±2                  | ±2                   | ±2           | ±2          | ±5                                             |
| <b>System Calibrations - Instrument Response</b>              |                        |                     |                      |              |             |                                                |
| Initial Zero                                                  | $C_{s, zero (pre)}$    | 0.01                | 0.02                 | 0.5          | 0.4         | -0.3                                           |
| Final Zero                                                    | $C_{s, zero (post)}$   | 0.00                | -0.04                | 0.36         | 0.3         | -0.15                                          |
| Upscale Gas Standard                                          | $C_{MA}$               | 21.99               | 18.22                | 125.6        | 48.0        | 52.4                                           |
| Initial Upscale                                               | $C_{v, up (pre)}$      | 22.01               | 18.14                | 126.9        | 47.75       | 52.3                                           |
| Final Upscale                                                 | $C_{v, up (post)}$     | 21.98               | 18.18                | 126.5        | 47.71       | 51.83                                          |
| <b>System Bias - Results (Percent)</b>                        |                        |                     |                      |              |             |                                                |
| Zero (pre)                                                    | $SB_{i (zero)}$        | 0.1                 | 0.4                  | 0.3          | 0.4         | -0.4                                           |
| Zero (post)                                                   | $SB_{final (zero)}$    | 0.0                 | 0.1                  | 0.2          | 0.3         | -0.3                                           |
| Upscale (pre)                                                 | $SB_{i (upscale)}$     | -0.1                | -0.3                 | -0.4         | -0.2        | -0.1                                           |
| Upscale (post)                                                | $SB_{final (upscale)}$ | -0.3                | -0.1                 | -0.5         | -0.3        | -0.5                                           |
| Specification                                                 | $SB_{spec}$            | ±5                  | ±5                   | ±5           | ±5          | NA                                             |
| <b>System Drift - Results (Percent)</b>                       |                        |                     |                      |              |             |                                                |
| Zero                                                          | $D_{zero}$             | 0.0                 | 0.3                  | 0.1          | 0.2         | 0.2                                            |
| Upscale                                                       | $D_{upscale}$          | 0.1                 | 0.2                  | 0.2          | 0.0         | -0.5                                           |
| Specification                                                 | $D_{spec}$             | ±3                  | 3.0                  | 3.0          | 3.0         | ±3                                             |
| <b>Response Test - Results (seconds)</b>                      |                        |                     |                      |              |             |                                                |
| Upscale Test                                                  |                        | 35                  | 30                   | 35           | 30          | NA                                             |
| Zero Test                                                     |                        | 35                  | 30                   | 35           | 30          | NA                                             |
| Response Time                                                 |                        | 35                  | 30                   | 35           | 30          | 25                                             |
| <b>Calibration Correction</b>                                 |                        |                     |                      |              |             |                                                |
| Raw Average                                                   | $C_{ave}$              | 20.84               | 0.04                 | 11.85        | 1.21        | 6.93                                           |
| Bias Average - Zero                                           | $C_0$                  | 0.01                | -0.01                | 0.43         | 0.35        | N/A                                            |
| Bias Average - Upscale                                        | $C_M$                  | 22.00               | 18.16                | 126.70       | 47.73       | N/A                                            |
| Corrected Run Average                                         | $C_{Gas}$              | <b>20.84</b>        | <b>0.054</b>         | <b>11.36</b> | <b>0.87</b> | <b>6.93</b>                                    |

Enviva - Greenwood  
RCO2 (North)

Date: 16-Jan-19  
Run Time: 1545-1657

Run 4

| Parameter                                                     | Symbol                 | O <sub>2</sub><br>% | CO <sub>2</sub><br>% | CO<br>ppm    | NOx<br>ppm  | THC<br>ppm (as C <sub>3</sub> H <sub>8</sub> ) |
|---------------------------------------------------------------|------------------------|---------------------|----------------------|--------------|-------------|------------------------------------------------|
| <b>Analyzer Calibration Error - Calibration Standards</b>     |                        |                     |                      |              |             |                                                |
| Zero Gas                                                      | $C_{v, zero}$          | 0.0                 | 0.0                  | 0.0          | 0.0         | 0.0                                            |
| Low-Level Gas                                                 | $C_{v, low}$           | N/A                 | N/A                  | N/A          | N/A         | 25.3                                           |
| Mid-Level Gas                                                 | $C_{v, mid}$           | 11.1                | 10.0                 | 125.6        | 48.0        | 52.4                                           |
| High-Level Gas                                                | $C_{v, high}$          | 22.0                | 18.2                 | 226.4        | 89.5        | 85.8                                           |
| Calibration Span                                              | CS                     | 22.0                | 18.2                 | 226.4        | 89.5        | 100                                            |
| <b>Analyzer Calibration Error - Instrument Response</b>       |                        |                     |                      |              |             |                                                |
| Zero Gas                                                      | $C_{Dir, zero}$        | 0.0                 | -0.1                 | -0.1         | 0.0         | 0.1                                            |
| Low-Level Gas                                                 | $C_{Dir, low}$         | N/A                 | N/A                  | N/A          | N/A         | 26.1                                           |
| Mid-Level Gas                                                 | $C_{Dir, mid}$         | 11.1                | 10.0                 | 127.7        | 48.0        | 52.4                                           |
| High-Level Gas                                                | $C_{Dir, high}$        | 22.0                | 18.2                 | 227.4        | 89.6        | 85.8                                           |
| <b>Analyzer Calibration Error - Results (Percent of Span)</b> |                        |                     |                      |              |             |                                                |
| Zero Gas                                                      | $ACE_{zero}$           | 0.0                 | -0.3                 | 0.0          | 0.0         | 0.1                                            |
| Low-Level Gas                                                 | $ACE_{low}$            | N/A                 | N/A                  | N/A          | N/A         | 3.4                                            |
| Mid-Level Gas                                                 | $ACE_{mid}$            | 0.1                 | 0.2                  | 0.9          | 0.0         | -0.1                                           |
| High-Level Gas                                                | $ACE_{high}$           | 0.2                 | -0.1                 | 0.4          | 0.1         | 0.0                                            |
| Specification                                                 | $ACE_{spec}$           | ±2                  | ±2                   | ±2           | ±2          | ±5                                             |
| <b>System Calibrations - Instrument Response</b>              |                        |                     |                      |              |             |                                                |
| Initial Zero                                                  | $C_{s, zero (pre)}$    | 0.00                | -0.04                | 0.36         | 0.27        | -0.15                                          |
| Final Zero                                                    | $C_{s, zero (post)}$   | 0.007               | -0.15                | 0.9          | 0.1         | 0.29                                           |
| Upscale Gas Standard                                          | $C_{MA}$               | 21.99               | 18.22                | 125.6        | 48.0        | 52.4                                           |
| Initial Upscale                                               | $C_{v, up (pre)}$      | 21.98               | 18.18                | 126.5        | 47.71       | 51.83                                          |
| Final Upscale                                                 | $C_{v, up (post)}$     | 21.89               | 18.17                | 126.5        | 47.44       | 52.18                                          |
| <b>System Bias - Results (Percent)</b>                        |                        |                     |                      |              |             |                                                |
| Zero (pre)                                                    | $SB_i (zero)$          | 0.0                 | 0.1                  | 0.2          | 0.3         | -0.3                                           |
| Zero (post)                                                   | $SB_{final} (zero)$    | 0.0                 | -0.5                 | 0.4          | 0.1         | 0.2                                            |
| Upscale (pre)                                                 | $SB_i (upscale)$       | -0.3                | -0.1                 | -0.5         | -0.3        | -0.5                                           |
| Upscale (post)                                                | $SB_{final} (upscale)$ | -0.7                | -0.2                 | -0.5         | -0.6        | -0.2                                           |
| Specification                                                 | $SB_{spec}$            | ±5                  | ±5                   | ±5           | ±5          | NA                                             |
| <b>System Drift - Results (Percent)</b>                       |                        |                     |                      |              |             |                                                |
| Zero                                                          | $D_{zero}$             | 0.0                 | 0.6                  | 0.2          | 0.2         | 0.4                                            |
| Upscale                                                       | $D_{upscale}$          | 0.4                 | 0.1                  | 0.0          | 0.3         | 0.4                                            |
| Specification                                                 | $D_{spec}$             | ±3                  | 3.0                  | 3.0          | 3.0         | ±3                                             |
| <b>Response Test - Results (seconds)</b>                      |                        |                     |                      |              |             |                                                |
| Upscale Test                                                  |                        | 35                  | 30                   | 35           | 30          | NA                                             |
| Zero Test                                                     |                        | 35                  | 30                   | 35           | 30          | NA                                             |
| Response Time                                                 |                        | 35                  | 30                   | 35           | 30          | 25                                             |
| <b>Calibration Correction</b>                                 |                        |                     |                      |              |             |                                                |
| Raw Average                                                   | $C_{ave}$              | 20.84               | -0.08                | 10.9         | 1.12        | 7.53                                           |
| Bias Average - Zero                                           | $C_0$                  | 0.01                | -0.10                | 0.61         | 0.19        | N/A                                            |
| Bias Average - Upscale                                        | $C_M$                  | 21.94               | 18.18                | 126.50       | 47.58       | N/A                                            |
| Corrected Run Average                                         | $C_{Gas}$              | <b>20.89</b>        | <b>0.019</b>         | <b>10.26</b> | <b>0.95</b> | <b>7.53</b>                                    |

Enviva - Greenwood  
RCO2 (North)

Date: 16-Jan-19  
Run Time: 1837-2001

Run 5

| Parameter                                                     | Symbol                 | O <sub>2</sub><br>% | CO <sub>2</sub><br>% | CO<br>ppm   | NOx<br>ppm  | THC<br>ppm (as C <sub>3</sub> H <sub>8</sub> ) |
|---------------------------------------------------------------|------------------------|---------------------|----------------------|-------------|-------------|------------------------------------------------|
| <b>Analyzer Calibration Error - Calibration Standards</b>     |                        |                     |                      |             |             |                                                |
| Zero Gas                                                      | $C_{v, zero}$          | 0.0                 | 0.0                  | 0.0         | 0.0         | 0.0                                            |
| Low-Level Gas                                                 | $C_{v, low}$           | N/A                 | N/A                  | N/A         | N/A         | 25.3                                           |
| Mid-Level Gas                                                 | $C_{v, mid}$           | 11.1                | 10.0                 | 125.6       | 48.0        | 52.4                                           |
| High-Level Gas                                                | $C_{v, high}$          | 22.0                | 18.2                 | 226.4       | 89.5        | 85.8                                           |
| Calibration Span                                              | CS                     | 21.99               | 18.22                | 226.4       | 89.5        | 100.0                                          |
| <b>Analyzer Calibration Error - Instrument Response</b>       |                        |                     |                      |             |             |                                                |
| Zero Gas                                                      | $C_{Dir, zero}$        | 0.0                 | -0.1                 | -0.1        | 0.0         | 0.10                                           |
| Low-Level Gas                                                 | $C_{Dir, low}$         | N/A                 | N/A                  | N/A         | N/A         | 26.1                                           |
| Mid-Level Gas                                                 | $C_{Dir, mid}$         | 11.1                | 10.0                 | 127.7       | 48.0        | 52.4                                           |
| High-Level Gas                                                | $C_{Dir, high}$        | 22.0                | 18.2                 | 227.4       | 89.6        | 85.8                                           |
| <b>Analyzer Calibration Error - Results (Percent of Span)</b> |                        |                     |                      |             |             |                                                |
| Zero Gas                                                      | $ACE_{zero}$           | 0.0                 | -0.3                 | 0.0         | 0.0         | 0.1                                            |
| Low-Level Gas                                                 | $ACE_{low}$            | N/A                 | N/A                  | N/A         | N/A         | 3.4                                            |
| Mid-Level Gas                                                 | $ACE_{mid}$            | 0.1                 | 0.2                  | 0.9         | 0.0         | -0.1                                           |
| High-Level Gas                                                | $ACE_{high}$           | 0.2                 | -0.1                 | 0.4         | 0.1         | 0.0                                            |
| Specification                                                 | $ACE_{spec}$           | ±2                  | ±2                   | ±2          | ±2          | ±5                                             |
| <b>System Calibrations - Instrument Response</b>              |                        |                     |                      |             |             |                                                |
| Initial Zero                                                  | $C_{s, zero (pre)}$    | 0.01                | -0.15                | 0.85        | 0.10        | 0.29                                           |
| Final Zero                                                    | $C_{s, zero (post)}$   | -0.012              | 0.14                 | 0.1         | 0.01        | 0.19                                           |
| Upscale Gas Standard                                          | $C_{MA}$               | 21.99               | 18.22                | 125.6       | 48.0        | 52.4                                           |
| Initial Upscale                                               | $C_{v, up (pre)}$      | 21.89               | 18.17                | 126.5       | 47.44       | 52.18                                          |
| Final Upscale                                                 | $C_{v, up (post)}$     | 22                  | 18.2                 | 128.11      | 47.84       | 52.48                                          |
| <b>System Bias - Results (Percent)</b>                        |                        |                     |                      |             |             |                                                |
| Zero (pre)                                                    | $SB_i (zero)$          | 0.0                 | -0.5                 | 0.4         | 0.1         | 0.2                                            |
| Zero (post)                                                   | $SB_{final} (zero)$    | 0.0                 | 1.1                  | 0.1         | 0.0         | 0.1                                            |
| Upscale (pre)                                                 | $SB_i (upscale)$       | -0.7                | -0.2                 | -0.5        | -0.6        | -0.2                                           |
| Upscale (post)                                                | $SB_{final} (upscale)$ | -0.2                | 0.0                  | 0.2         | -0.1        | 0.1                                            |
| Specification                                                 | $SB_{spec}$            | ±5                  | ±5                   | ±5          | ±5          | NA                                             |
| <b>System Drift - Results (Percent)</b>                       |                        |                     |                      |             |             |                                                |
| Zero                                                          | $D_{zero}$             | 0.1                 | 1.6                  | 0.3         | 0.1         | -0.1                                           |
| Upscale                                                       | $D_{upscale}$          | 0.5                 | 0.2                  | 0.7         | 0.4         | 0.3                                            |
| Specification                                                 | $D_{spec}$             | ±3                  | 3.0                  | 3.0         | 3.0         | ±3                                             |
| <b>Response Test - Results (seconds)</b>                      |                        |                     |                      |             |             |                                                |
| Upscale Test                                                  |                        | 35                  | 30                   | 35          | 30          | NA                                             |
| Zero Test                                                     |                        | 35                  | 30                   | 35          | 30          | NA                                             |
| Response Time                                                 |                        | 35                  | 30                   | 35          | 30          | 25                                             |
| <b>Calibration Correction</b>                                 |                        |                     |                      |             |             |                                                |
| Raw Average                                                   | $C_{ave}$              | 20.86               | 0.17                 | 10.1        | 1.06        | 6.71                                           |
| Bias Average - Zero                                           | $C_0$                  | 0.00                | 0.00                 | 0.49        | 0.06        | N/A                                            |
| Bias Average - Upscale                                        | $C_M$                  | 21.95               | 18.19                | 127.31      | 47.64       | N/A                                            |
| Corrected Run Average                                         | $C_{Gas}$              | <b>20.86</b>        | <b>0.17</b>          | <b>9.52</b> | <b>1.01</b> | <b>6.71</b>                                    |

**Test Run 3 Begin. STRATA Version 3.2.112****Operator: David Goshaw****Plant Name: Enviva Greenwood****Location: PC North Exhaust (RCO2)**

| Start Averaging |          | O2<br>% | CO2<br>% | THC<br>ppm | NOx<br>ppm | CO<br>ppm |
|-----------------|----------|---------|----------|------------|------------|-----------|
| 1/16/2019       | 14:08:25 | 20.835  | 0.056    | 5.18       | 1.17       | 12.26     |
| 1/16/2019       | 14:09:25 | 20.845  | 0.049    | 6.32       | 1.13       | 12.52     |
| 1/16/2019       | 14:10:24 | 20.835  | 0.085    | 6.86       | 1.1        | 12.61     |
| 1/16/2019       | 14:11:24 | 20.839  | 0.086    | 6.91       | 1.14       | 12.58     |
| 1/16/2019       | 14:12:24 | 20.836  | 0.098    | 6.17       | 1.19       | 12.56     |
| 1/16/2019       | 14:13:24 | 20.844  | 0.056    | 5.48       | 1.17       | 11.94     |
| 1/16/2019       | 14:14:24 | 20.846  | 0.073    | 8.21       | 1.14       | 11.59     |
| 1/16/2019       | 14:15:25 | 20.845  | 0.037    | 8.45       | 1.1        | 12.28     |
| 1/16/2019       | 14:16:25 | 20.838  | 0.01     | 5.66       | 1.14       | 12.24     |
| 1/16/2019       | 14:17:24 | 20.845  | 0.027    | 6.76       | 1.18       | 11.61     |
| 1/16/2019       | 14:18:24 | 20.856  | 0.038    | 7.67       | 1.15       | 12.03     |
| 1/16/2019       | 14:19:24 | 20.843  | 0.07     | 8.07       | 1.13       | 11.86     |
| 1/16/2019       | 14:20:24 | 20.852  | 0.061    | 8.21       | 1.15       | 12.06     |
| 1/16/2019       | 14:21:25 | 20.838  | 0.078    | 6.14       | 1.22       | 12.57     |
| 1/16/2019       | 14:22:25 | 20.835  | 0.045    | 4.7        | 1.21       | 11.86     |
| 1/16/2019       | 14:23:25 | 20.845  | 0.047    | 7.77       | 1.18       | 11.72     |
| 1/16/2019       | 14:24:25 | 20.843  | 0.063    | 8.12       | 1.15       | 12.52     |
| 1/16/2019       | 14:25:24 | 20.828  | 0.075    | 5.29       | 1.2        | 12.6      |
| 1/16/2019       | 14:26:24 | 20.842  | 0.069    | 6.6        | 1.24       | 11.89     |
| 1/16/2019       | 14:27:24 | 20.853  | 0.057    | 6.9        | 1.21       | 12.23     |
| 1/16/2019       | 14:28:24 | 20.842  | 0.087    | 7.56       | 1.17       | 12.18     |
| 1/16/2019       | 14:29:24 | 20.843  | 0.094    | 8.68       | 1.2        | 12.55     |
| 1/16/2019       | 14:30:24 | 20.836  | 0.071    | 6.83       | 1.25       | 12.46     |
| 1/16/2019       | 14:31:24 | 20.843  | 0.066    | 5.92       | 1.25       | 12.15     |
| 1/16/2019       | 14:32:24 | 20.845  | 0.07     | 8.17       | 1.22       | 11.9      |
| 1/16/2019       | 14:33:24 | 20.838  | 0.047    | 7.74       | 1.19       | 12.3      |
| 1/16/2019       | 14:34:24 | 20.842  | 0.073    | 5.79       | 1.25       | 12.49     |
| 1/16/2019       | 14:35:25 | 20.843  | 0.066    | 6.69       | 1.27       | 11.76     |
| 1/16/2019       | 14:36:25 | 20.85   | 0.054    | 6.57       | 1.22       | 11.81     |
| 1/16/2019       | 14:37:25 | 20.841  | 0.058    | 7.46       | 1.19       | 11.21     |
| Pause           |          |         |          |            |            |           |
| End Pause       |          |         |          |            |            |           |
| 1/16/2019       | 14:49:25 | 20.847  | 0.036    | 5.65       | 1.24       | 11.09     |
| 1/16/2019       | 14:50:25 | 20.856  | 0.025    | 8.17       | 1.23       | 11.21     |
| 1/16/2019       | 14:51:24 | 20.844  | 0.03     | 8.41       | 1.2        | 11.26     |
| 1/16/2019       | 14:52:24 | 20.844  | -0.004   | 7.19       | 1.24       | 11.66     |
| 1/16/2019       | 14:53:24 | 20.842  | 0.008    | 5.93       | 1.27       | 11.86     |
| 1/16/2019       | 14:54:25 | 20.849  | 0.036    | 6.03       | 1.25       | 11.76     |
| 1/16/2019       | 14:55:24 | 20.846  | 0.028    | 8.3        | 1.2        | 11.48     |
| 1/16/2019       | 14:56:24 | 20.851  | 0.044    | 8.45       | 1.19       | 12.25     |
| 1/16/2019       | 14:57:24 | 20.84   | 0.062    | 5.46       | 1.21       | 12.27     |
| 1/16/2019       | 14:58:25 | 20.847  | 0.037    | 6.3        | 1.23       | 11.21     |
| 1/16/2019       | 14:59:24 | 20.856  | 0.068    | 7.84       | 1.23       | 11.72     |

**Test Run 3 Begin. STRATA Version 3.2.112****Operator: David Goshaw****Plant Name: Enviva Greenwood****Location: PC North Exhaust (RCO2)**

|           |          | <b>O2</b> | <b>CO2</b> | <b>THC</b> | <b>NOx</b> | <b>CO</b> |
|-----------|----------|-----------|------------|------------|------------|-----------|
| 1/16/2019 | 15:00:24 | 20.846    | 0.041      | 8.27       | 1.19       | 11.59     |
| 1/16/2019 | 15:01:24 | 20.856    | 0.044      | 7.76       | 1.21       | 12.04     |
| 1/16/2019 | 15:02:24 | 20.836    | 0.005      | 5.51       | 1.22       | 12.08     |
| 1/16/2019 | 15:03:24 | 20.843    | 0.016      | 5.2        | 1.24       | 11.74     |
| 1/16/2019 | 15:04:24 | 20.852    | 0.022      | 8.55       | 1.23       | 11.35     |
| 1/16/2019 | 15:05:24 | 20.85     | 0.025      | 8.83       | 1.19       | 12.01     |
| 1/16/2019 | 15:06:24 | 20.847    | 0.007      | 5.96       | 1.23       | 11.67     |
| 1/16/2019 | 15:07:24 | 20.842    | 0.024      | 6.14       | 1.26       | 11.53     |
| 1/16/2019 | 15:08:24 | 20.855    | 0.032      | 7.01       | 1.25       | 11.65     |
| 1/16/2019 | 15:09:24 | 20.843    | 0.033      | 7.63       | 1.23       | 11.39     |
| 1/16/2019 | 15:10:24 | 20.848    | 0.023      | 8.42       | 1.24       | 12.01     |
| 1/16/2019 | 15:11:24 | 20.837    | 0.011      | 5.84       | 1.29       | 11.83     |
| 1/16/2019 | 15:12:24 | 20.841    | -0.001     | 4.71       | 1.3        | 11.43     |
| 1/16/2019 | 15:13:25 | 20.841    | -0.004     | 7.47       | 1.25       | 11.15     |
| 1/16/2019 | 15:14:25 | 20.844    | 0.007      | 7.93       | 1.21       | 11.54     |
| 1/16/2019 | 15:15:25 | 20.837    | 0.005      | 5.51       | 1.25       | 11.39     |
| 1/16/2019 | 15:16:25 | 20.845    | 0.028      | 6.12       | 1.28       | 11.09     |
| 1/16/2019 | 15:17:24 | 20.846    | 0.017      | 6.68       | 1.28       | 10.66     |
| 1/16/2019 | 15:18:24 | 20.837    | 0.035      | 7.51       | 1.24       | 10.5      |

Test Run 3 End

15:19:24

| <b>O2</b>    | <b>CO2</b>  | <b>THC</b>  | <b>NOx</b>  | <b>CO</b>     |
|--------------|-------------|-------------|-------------|---------------|
| <b>%</b>     | <b>%</b>    | <b>ppm</b>  | <b>ppm</b>  | <b>ppm</b>    |
| <b>20.84</b> | <b>0.04</b> | <b>6.93</b> | <b>1.21</b> | <b>11.846</b> |

**Test Run 4 Begin. STRATA Version 3.2.112****Operator: David Goshaw****Plant Nam Enviva Greenwood****Location: PC North Exhaust (RCO2)**

| Start Averaging |          | O2<br>% | CO2<br>% | THC<br>ppm | NOx<br>ppm | CO<br>ppm |
|-----------------|----------|---------|----------|------------|------------|-----------|
| 1/16/2019       | 15:46:07 | 20.837  | -0.014   | 9.01       | 1.2        | 11.16     |
| 1/16/2019       | 15:47:07 | 20.836  | -0.038   | 7.19       | 1.23       | 10.94     |
| 1/16/2019       | 15:48:07 | 20.839  | -0.035   | 6.62       | 1.27       | 10.78     |
| 1/16/2019       | 15:49:07 | 20.837  | -0.033   | 6.31       | 1.23       | 10.86     |
| 1/16/2019       | 15:50:07 | 20.835  | -0.004   | 7.88       | 1.19       | 10.45     |
| 1/16/2019       | 15:51:07 | 20.84   | 0.018    | 9.21       | 1.15       | 11.1      |
| 1/16/2019       | 15:52:07 | 20.833  | 0.021    | 6.46       | 1.2        | 10.99     |
| 1/16/2019       | 15:53:07 | 20.844  | 0.009    | 6.38       | 1.23       | 10.21     |
| 1/16/2019       | 15:54:06 | 20.847  | -0.007   | 8.71       | 1.2        | 10.43     |
| 1/16/2019       | 15:55:06 | 20.842  | 0.005    | 9.21       | 1.14       | 10.58     |
| 1/16/2019       | 15:56:06 | 20.85   | -0.003   | 7.98       | 1.13       | 10.91     |
| 1/16/2019       | 15:57:06 | 20.836  | -0.016   | 6.47       | 1.17       | 10.81     |
| 1/16/2019       | 15:58:06 | 20.838  | -0.008   | 6.08       | 1.18       | 10.75     |
| 1/16/2019       | 15:59:06 | 20.839  | -0.021   | 8.74       | 1.18       | 10.35     |
| 1/16/2019       | 16:00:07 | 20.849  | -0.025   | 9.32       | 1.13       | 11.15     |
| 1/16/2019       | 16:01:07 | 20.837  | -0.032   | 6.41       | 1.16       | 11.09     |
| 1/16/2019       | 16:02:07 | 20.842  | -0.018   | 6.66       | 1.19       | 10.51     |
| 1/16/2019       | 16:03:07 | 20.843  | -0.02    | 8.08       | 1.15       | 10.78     |
| 1/16/2019       | 16:04:06 | 20.832  | -0.045   | 8.45       | 1.09       | 10.47     |
| 1/16/2019       | 16:05:07 | 20.845  | -0.06    | 8.5        | 1.09       | 11.32     |
| 1/16/2019       | 16:06:07 | 20.838  | -0.066   | 7.33       | 1.11       | 11.32     |
| 1/16/2019       | 16:07:07 | 20.846  | -0.076   | 6.83       | 1.13       | 10.67     |
| 1/16/2019       | 16:08:07 | 20.842  | -0.054   | 9.69       | 1.12       | 10.5      |
| 1/16/2019       | 16:09:07 | 20.848  | -0.051   | 9.62       | 1.1        | 11.48     |
| 1/16/2019       | 16:10:07 | 20.841  | -0.027   | 6.43       | 1.1        | 11.3      |
| 1/16/2019       | 16:11:07 | 20.844  | -0.048   | 6.82       | 1.13       | 10.96     |
| 1/16/2019       | 16:12:06 | 20.846  | -0.021   | 7.59       | 1.11       | 11.07     |
| 1/16/2019       | 16:13:07 | 20.836  | -0.03    | 8.15       | 1.07       | 10.74     |
| 1/16/2019       | 16:14:07 | 20.847  | -0.035   | 8.8        | 1.07       | 11.43     |
| 1/16/2019       | 16:15:07 | 20.836  | -0.033   | 6.88       | 1.09       | 11.47     |
| Pause           |          |         |          |            |            |           |
| End Pause       |          |         |          |            |            |           |
| 1/16/2019       | 16:28:07 | 20.836  | -0.256   | 7.04       | 1.09       | 10.25     |
| 1/16/2019       | 16:29:07 | 20.845  | -0.256   | 7.53       | 1.15       | 10.19     |
| 1/16/2019       | 16:30:07 | 20.847  | -0.256   | 7.3        | 1.11       | 10.45     |
| 1/16/2019       | 16:31:07 | 20.843  | -0.255   | 8.38       | 1.08       | 10.32     |
| 1/16/2019       | 16:32:07 | 20.845  | -0.257   | 8.9        | 1.08       | 11.27     |
| 1/16/2019       | 16:33:07 | 20.833  | -0.247   | 6.42       | 1.14       | 11.42     |
| 1/16/2019       | 16:34:07 | 20.839  | -0.157   | 6.03       | 1.14       | 10.73     |
| 1/16/2019       | 16:35:07 | 20.845  | -0.157   | 8.13       | 1.09       | 10.72     |
| 1/16/2019       | 16:36:07 | 20.83   | -0.156   | 8.26       | 1.06       | 10.65     |
| 1/16/2019       | 16:37:07 | 20.836  | -0.157   | 6.81       | 1.09       | 10.7      |
| 1/16/2019       | 16:38:07 | 20.831  | -0.157   | 6.73       | 1.11       | 10.73     |

**Test Run 4 Begin. STRATA Version 3.2.112****Operator: David Goshaw****Plant Nam Enviva Greenwood****Location: PC North Exhaust (RCO2)**

|           |          | <b>O2</b> | <b>CO2</b> | <b>THC</b> | <b>NOx</b> | <b>CO</b> |
|-----------|----------|-----------|------------|------------|------------|-----------|
| 1/16/2019 | 16:39:06 | 20.844    | -0.157     | 6.44       | 1.09       | 10.62     |
| 1/16/2019 | 16:40:06 | 20.842    | -0.157     | 8.26       | 1.06       | 10.34     |
| 1/16/2019 | 16:41:07 | 20.848    | -0.157     | 8.52       | 1.05       | 11.24     |
| 1/16/2019 | 16:42:07 | 20.843    | -0.156     | 6.11       | 1.07       | 11.17     |
| 1/16/2019 | 16:43:08 | 20.84     | -0.157     | 5.99       | 1.09       | 10.42     |
| 1/16/2019 | 16:44:06 | 20.85     | -0.157     | 7.5        | 1.05       | 10.55     |
| 1/16/2019 | 16:45:07 | 20.837    | -0.158     | 8.01       | 1.03       | 10.41     |
| 1/16/2019 | 16:46:07 | 20.843    | -0.157     | 7.71       | 1.06       | 10.72     |
| 1/16/2019 | 16:47:07 | 20.838    | -0.157     | 7.01       | 1.09       | 10.8      |
| 1/16/2019 | 16:48:07 | 20.843    | -0.158     | 6.35       | 1.09       | 10.64     |
| 1/16/2019 | 16:49:07 | 20.843    | -0.157     | 8.36       | 1.05       | 10.49     |
| 1/16/2019 | 16:50:07 | 20.838    | -0.157     | 8.16       | 1.05       | 11.4      |
| 1/16/2019 | 16:51:07 | 20.827    | -0.157     | 5.49       | 1.09       | 11.27     |
| 1/16/2019 | 16:52:07 | 20.841    | 0.008      | 6.63       | 1.14       | 12.05     |
| 1/16/2019 | 16:53:07 | 20.854    | 0.172      | 7.89       | 1.13       | 11.65     |
| 1/16/2019 | 16:54:07 | 20.845    | 0.149      | 8.33       | 1.09       | 11.25     |
| 1/16/2019 | 16:55:07 | 20.848    | 0.155      | 8.09       | 1.12       | 11.8      |
| 1/16/2019 | 16:56:07 | 20.835    | 0.158      | 6.08       | 1.16       | 11.82     |

Test Run 4 End

16:57:16

| <b>O2</b>   | <b>CO2</b>  | <b>THC</b>  | <b>NOx</b>  | <b>CO</b>   |
|-------------|-------------|-------------|-------------|-------------|
| <b>%</b>    | <b>%</b>    | <b>ppm</b>  | <b>ppm</b>  | <b>ppm</b>  |
| <b>20.8</b> | <b>-0.1</b> | <b>7.53</b> | <b>1.12</b> | <b>10.9</b> |



**Test Run 5 Begin. STRATA Version 3.2.112****Operator: David Goshaw****Plant Name: Enviva Greenwood****Location: PC North Exhaust (RCO2)**

| Start Averaging |          | O2<br>% | CO2<br>% | THC<br>ppm | NOx<br>ppm | CO<br>ppm |
|-----------------|----------|---------|----------|------------|------------|-----------|
| 1/16/2019       | 18:38:16 | 20.863  | 0.187    | 8.23       | 1          | 11.06     |
| 1/16/2019       | 18:39:16 | 20.853  | 0.178    | 8.63       | 1          | 11.35     |
| 1/16/2019       | 18:40:15 | 20.853  | 0.129    | 6.1        | 1.06       | 11.35     |
| 1/16/2019       | 18:41:15 | 20.862  | 0.176    | 6.99       | 1.1        | 10.95     |
| 1/16/2019       | 18:42:15 | 20.863  | 0.155    | 7.32       | 1.05       | 11.25     |
| 1/16/2019       | 18:43:15 | 20.855  | 0.133    | 7.55       | 1.03       | 10.89     |
| 1/16/2019       | 18:44:15 | 20.857  | 0.125    | 7.88       | 1.06       | 11.48     |
| 1/16/2019       | 18:45:15 | 20.854  | 0.15     | 5.83       | 1.1        | 12.01     |
| 1/16/2019       | 18:46:15 | 20.859  | 0.137    | 5.12       | 1.09       | 11.16     |
| Pause           |          |         |          |            |            |           |
| End Pause       |          |         |          |            |            |           |
| 1/16/2019       | 18:50:16 | 20.868  | 0.149    | 7.08       | 1.07       | 10.56     |
| 1/16/2019       | 18:51:15 | 20.867  | 0.156    | 7.16       | 1.05       | 10.74     |
| 1/16/2019       | 18:52:16 | 20.844  | 0.147    | 7.74       | 1.03       | 10.66     |
| Pause           |          |         |          |            |            |           |
| End Pause       |          |         |          |            |            |           |
| 1/16/2019       | 18:54:16 | 20.84   | 0.157    | 6.25       | 1.13       | 11.17     |
| 1/16/2019       | 18:55:16 | 20.847  | 0.104    | 5.77       | 1.14       | 10.48     |
| 1/16/2019       | 18:56:16 | 20.865  | 0.079    | 7.95       | 1.09       | 10.48     |
| 1/16/2019       | 18:57:16 | 20.854  | 0.135    | 8.44       | 1.05       | 10.4      |
| 1/16/2019       | 18:58:16 | 20.853  | 0.169    | 6.83       | 1.1        | 10.68     |
| 1/16/2019       | 18:59:16 | 20.857  | 0.227    | 7.22       | 1.15       | 11.41     |
| 1/16/2019       | 19:00:16 | 20.87   | 0.224    | 6.35       | 1.12       | 10.58     |
| 1/16/2019       | 19:01:16 | 20.867  | 0.126    | 6.92       | 1.06       | 9.03      |
| Pause           |          |         |          |            |            |           |
| End Pause       |          |         |          |            |            |           |
| 1/16/2019       | 19:08:16 | 20.866  | 0.156    | 6.2        | 1.03       | 8.4       |
| 1/16/2019       | 19:09:16 | 20.86   | 0.203    | 6.02       | 1.05       | 10        |
| 1/16/2019       | 19:10:15 | 20.862  | 0.18     | 6.78       | 1.04       | 9.87      |
| 1/16/2019       | 19:11:15 | 20.878  | 0.201    | 6.52       | 1.04       | 9.55      |
| 1/16/2019       | 19:12:15 | 20.869  | 0.179    | 5.1        | 1.05       | 8.28      |
| 1/16/2019       | 19:13:16 | 20.88   | 0.192    | 5.54       | 1.04       | 7.82      |
| 1/16/2019       | 19:14:16 | 20.884  | 0.198    | 7.05       | 0.97       | 7.96      |
| 1/16/2019       | 19:15:15 | 20.862  | 0.141    | 7.49       | 0.95       | 8.71      |
| 1/16/2019       | 19:16:15 | 20.863  | 0.155    | 6.98       | 1.02       | 9.92      |
| 1/16/2019       | 19:17:15 | 20.869  | 0.153    | 5.56       | 1.08       | 9.92      |
| 1/16/2019       | 19:18:16 | 20.875  | 0.147    | 4.88       | 1.06       | 9.21      |
| 1/16/2019       | 19:19:16 | 20.876  | 0.153    | 6.49       | 0.99       | 8.27      |
| 1/16/2019       | 19:20:16 | 20.868  | 0.156    | 7.46       | 0.96       | 8.9       |
| 1/16/2019       | 19:21:16 | 20.859  | 0.176    | 5.59       | 1.01       | 9.2       |
| Pause           |          |         |          |            |            |           |
| End Pause       |          |         |          |            |            |           |
| 1/16/2019       | 19:32:16 | 20.875  | 0.179    | 7.25       | 0.89       | 9.22      |

**Test Run 5 Begin. STRATA Version 3.2.112**

**Operator: David Goshaw**

**Plant Name: Enviva Greenwood**

**Location: PC North Exhaust (RCO2)**

|           |          | <b>O2</b> | <b>CO2</b> | <b>THC</b> | <b>NOx</b> | <b>CO</b> |
|-----------|----------|-----------|------------|------------|------------|-----------|
| 1/16/2019 | 19:33:16 | 20.86     | 0.166      | 7.81       | 0.97       | 9.59      |
| 1/16/2019 | 19:34:16 | 20.874    | 0.163      | 8.47       | 1.03       | 10.32     |
| 1/16/2019 | 19:35:16 | 20.86     | 0.157      | 6.17       | 1.06       | 10.25     |
| 1/16/2019 | 19:36:15 | 20.868    | 0.16       | 5.69       | 1.08       | 9.61      |
| 1/16/2019 | 19:37:15 | 20.875    | 0.18       | 7.98       | 1.07       | 9.63      |
| 1/16/2019 | 19:38:15 | 20.87     | 0.21       | 7.56       | 1.03       | 9.78      |
| 1/16/2019 | 19:39:16 | 20.857    | 0.192      | 5.96       | 1.04       | 9.48      |
| 1/16/2019 | 19:40:15 | 20.864    | 0.158      | 6.18       | 1.07       | 9.83      |
| 1/16/2019 | 19:41:15 | 20.878    | 0.185      | 5.85       | 1.09       | 10.04     |
| 1/16/2019 | 19:42:15 | 20.869    | 0.154      | 6.5        | 1.04       | 8.84      |
| 1/16/2019 | 19:43:15 | 20.864    | 0.173      | 7.65       | 1.01       | 9.89      |
| 1/16/2019 | 19:44:15 | 20.855    | 0.144      | 5.71       | 1.06       | 10.46     |
| 1/16/2019 | 19:45:15 | 20.864    | 0.167      | 5.39       | 1.13       | 10.39     |
| 1/16/2019 | 19:46:15 | 20.869    | 0.141      | 7.06       | 1.11       | 10.32     |
| 1/16/2019 | 19:47:15 | 20.856    | 0.195      | 7.6        | 1.07       | 10.79     |
| 1/16/2019 | 19:48:15 | 20.861    | 0.173      | 6.45       | 1.06       | 10.52     |
| 1/16/2019 | 19:49:16 | 20.868    | 0.224      | 5.62       | 1.11       | 11.17     |
| 1/16/2019 | 19:50:15 | 20.876    | 0.169      | 5.72       | 1.09       | 9.41      |
| 1/16/2019 | 19:51:15 | 20.864    | 0.23       | 7.12       | 1.07       | 10.4      |
| 1/16/2019 | 19:52:15 | 20.852    | 0.204      | 8.01       | 1.05       | 11.01     |
| 1/16/2019 | 19:53:15 | 20.861    | 0.185      | 5.57       | 1.11       | 11.01     |
| 1/16/2019 | 19:54:15 | 20.872    | 0.238      | 5.52       | 1.14       | 10.12     |
| 1/16/2019 | 19:55:15 | 20.873    | 0.18       | 7.48       | 1.1        | 9.9       |

Test Run 5 End

1956:15:00

| <b>O2</b>    | <b>CO2</b>  | <b>THC</b>  | <b>NOx</b>  | <b>CO</b>    |
|--------------|-------------|-------------|-------------|--------------|
| <b>%</b>     | <b>%</b>    | <b>ppm</b>  | <b>ppm</b>  | <b>ppm</b>   |
| <b>20.86</b> | <b>0.17</b> | <b>6.71</b> | <b>1.06</b> | <b>10.10</b> |

| RCO 2 | Date/Time | Form-<br>aldehyde<br>(ppm) | MDL<br>(ppm) | HCl<br>(ppm) | MDL<br>(ppm) | Methanol<br>(ppm) | MDL<br>(ppm) | Acetaldehyde<br>(ppm) | MDL<br>(ppm) |
|-------|-----------|----------------------------|--------------|--------------|--------------|-------------------|--------------|-----------------------|--------------|
| Run 1 | 0945-1052 | 0.864                      | 0.086        | 0.048        | 0.107        | 0.053             | 0.412        | 0.202                 | 0.354        |
| Run 2 | 1229-1329 | 0.639                      | 0.084        | 0.002        | 0.104        | 0.075             | 0.410        | 0.166                 | 0.353        |
| Run 3 | 1407-1519 | 0.436                      | 0.080        | 0.008        | 0.099        | 0.080             | 0.378        | 0.095                 | 0.332        |
| Run 4 | 1545-1657 | 0.436                      | 0.080        | 0.006        | 0.099        | 0.075             | 0.380        | 0.147                 | 0.335        |
| Run 5 | 1835-2000 | <b>0.814</b>               | 0.086        | <b>0.038</b> | 0.107        | <b>0.056</b>      | 0.413        | <b>0.195</b>          | 0.3350       |

|       | Date            | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCl<br>(ppm) | SEC<br>(ppm) | Methanol<br>(ppm) | SEC<br>(ppm) | Acet-aldehyde<br>(ppm) | SEC<br>(ppm) |
|-------|-----------------|----------------------------|--------------|--------------|--------------|-------------------|--------------|------------------------|--------------|
| Run 1 | 1/16/2019 9:45  | 0.861                      | 0.041        | 0.100        | 0.050        | 0.089             | 0.200        | 0.000                  | 0.169        |
| Run 1 | 1/16/2019 9:46  | 0.747                      | 0.040        | 0.148        | 0.049        | 0.057             | 0.199        | 0.219                  | 0.168        |
| Run 1 | 1/16/2019 9:47  | 0.851                      | 0.040        | 0.133        | 0.047        | 0.098             | 0.199        | 0.152                  | 0.164        |
| Run 1 | 1/16/2019 9:48  | 0.732                      | 0.040        | 0.018        | 0.050        | 0.115             | 0.200        | 0.279                  | 0.167        |
| Run 1 | 1/16/2019 9:49  | 0.623                      | 0.040        | 0.167        | 0.054        | 0.046             | 0.200        | 0.145                  | 0.171        |
| Run 1 | 1/16/2019 9:50  | 0.620                      | 0.040        | 0.076        | 0.049        | 0.068             | 0.199        | 0.308                  | 0.168        |
| Run 1 | 1/16/2019 9:51  | 0.594                      | 0.037        | 0.061        | 0.048        | 0.127             | 0.197        | 0.293                  | 0.171        |
| Run 1 | 1/16/2019 9:52  | 0.761                      | 0.038        | 0.100        | 0.048        | 0.089             | 0.199        | 0.335                  | 0.160        |
| Run 1 | 1/16/2019 9:53  | 0.887                      | 0.040        | 0.026        | 0.051        | 0.108             | 0.201        | 0.260                  | 0.169        |
| Run 1 | 1/16/2019 9:54  | 0.792                      | 0.040        | 0.093        | 0.049        | 0.094             | 0.200        | 0.000                  | 0.167        |
| Run 1 | 1/16/2019 9:55  | 0.691                      | 0.040        | 0.119        | 0.046        | 0.040             | 0.200        | 0.140                  | 0.165        |
| Run 1 | 1/16/2019 9:56  | 0.845                      | 0.041        | 0.052        | 0.050        | 0.086             | 0.200        | 0.098                  | 0.165        |
| Run 1 | 1/16/2019 9:57  | 0.727                      | 0.041        | 0.062        | 0.051        | 0.117             | 0.203        | 0.108                  | 0.167        |
| Run 1 | 1/16/2019 9:58  | 0.602                      | 0.039        | 0.127        | 0.050        | 0.034             | 0.202        | 0.253                  | 0.169        |
| Run 1 | 1/16/2019 9:59  | 0.643                      | 0.041        | 0.050        | 0.049        | 0.084             | 0.202        | 0.226                  | 0.169        |
| Run 1 | 1/16/2019 10:00 | 0.551                      | 0.040        | 0.096        | 0.050        | 0.085             | 0.201        | 0.210                  | 0.167        |
| Run 1 | 1/16/2019 10:01 | 0.758                      | 0.039        | 0.057        | 0.045        | 0.080             | 0.204        | 0.256                  | 0.167        |
| Run 1 | 1/16/2019 10:02 | 0.935                      | 0.043        | 0.054        | 0.050        | 0.126             | 0.205        | 0.281                  | 0.169        |
| Run 1 | 1/16/2019 10:03 | 0.866                      | 0.042        | 0.107        | 0.052        | 0.064             | 0.204        | 0.140                  | 0.172        |
| Run 1 | 1/16/2019 10:04 | 0.745                      | 0.041        | 0.063        | 0.049        | 0.046             | 0.204        | 0.083                  | 0.170        |
| Run 1 | 1/16/2019 10:05 | 0.854                      | 0.042        | 0.065        | 0.052        | 0.116             | 0.202        | 0.128                  | 0.169        |
| Run 1 | 1/16/2019 10:06 | 0.793                      | 0.040        | 0.029        | 0.051        | 0.085             | 0.204        | 0.244                  | 0.171        |
| Run 1 | 1/16/2019 10:07 | 0.678                      | 0.042        | 0.062        | 0.053        | 0.067             | 0.208        | 0.272                  | 0.177        |
| Run 1 | 1/16/2019 10:08 | 0.653                      | 0.044        | 0.036        | 0.051        | 0.104             | 0.206        | 0.239                  | 0.180        |
| Run 1 | 1/16/2019 10:09 | 0.572                      | 0.041        | 0.016        | 0.050        | 0.064             | 0.207        | 0.400                  | 0.169        |
| Run 1 | 1/16/2019 10:10 | 0.900                      | 0.043        | 0.011        | 0.053        | 0.072             | 0.207        | 0.244                  | 0.175        |
| Run 1 | 1/16/2019 10:11 | 0.976                      | 0.044        | 0.020        | 0.053        | 0.072             | 0.206        | 0.195                  | 0.180        |
| Run 1 | 1/16/2019 10:12 | 0.806                      | 0.042        | 0.051        | 0.052        | 0.054             | 0.207        | 0.386                  | 0.177        |
| Run 1 | 1/16/2019 10:13 | 0.787                      | 0.042        | 0.049        | 0.051        | 0.045             | 0.207        | 0.105                  | 0.176        |
| Run 1 | 1/16/2019 10:14 | 0.768                      | 0.044        | 0.064        | 0.054        | 0.091             | 0.207        | 0.366                  | 0.180        |
| Run 1 | 1/16/2019 10:15 | 0.699                      | 0.043        | 0.014        | 0.053        | 0.108             | 0.211        | 0.257                  | 0.173        |
| Run 1 | 1/16/2019 10:16 | 0.657                      | 0.044        | 0.015        | 0.057        | 0.069             | 0.211        | 0.201                  | 0.182        |
| Run 1 | 1/16/2019 10:17 | 0.640                      | 0.043        | 0.115        | 0.051        | 0.070             | 0.211        | 0.306                  | 0.177        |
| Run 1 | 1/16/2019 10:18 | 0.452                      | 0.042        | 0.062        | 0.052        | 0.019             | 0.177        | 0.016                  | 0.179        |
| Run 1 | 1/16/2019 10:19 | 0.735                      | 0.044        | 0.067        | 0.056        | 0.047             | 0.195        | 0.262                  | 0.182        |
| Run 1 | 1/16/2019 10:20 | 0.784                      | 0.044        | 0.032        | 0.054        | 0.080             | 0.213        | 0.227                  | 0.185        |
| Run 1 | 1/16/2019 10:21 |                            |              |              |              |                   |              |                        |              |
| Run 1 | 1/16/2019 10:22 |                            |              |              |              |                   |              |                        |              |
| Run 1 | 1/16/2019 10:23 | 1.121                      | 0.046        | 0.058        | 0.057        | 0.081             | 0.214        | 0.317                  | 0.188        |
| Run 1 | 1/16/2019 10:24 | 1.405                      | 0.046        | 0.082        | 0.059        | 0.049             | 0.214        | 0.369                  | 0.190        |
| Run 1 | 1/16/2019 10:25 | 1.594                      | 0.044        | 0.063        | 0.055        | 0.046             | 0.215        | 0.269                  | 0.182        |
| Run 1 | 1/16/2019 10:26 | 1.556                      | 0.044        | 0.031        | 0.057        | 0.014             | 0.214        | 0.368                  | 0.184        |

|       | Date            | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCl<br>(ppm) | SEC<br>(ppm) | Methanol<br>(ppm) | SEC<br>(ppm) | Acet-aldehyde<br>(ppm) | SEC<br>(ppm) |
|-------|-----------------|----------------------------|--------------|--------------|--------------|-------------------|--------------|------------------------|--------------|
| Run 1 | 1/16/2019 10:28 | 1.567                      | 0.048        | 0.027        | 0.059        | 0.000             | 0.213        | 0.162                  | 0.195        |
| Run 1 | 1/16/2019 10:29 | 1.695                      | 0.046        | 0.001        | 0.059        | 0.059             | 0.214        | 0.037                  | 0.190        |
| Run 1 | 1/16/2019 10:30 | 1.525                      | 0.046        | 0.023        | 0.056        | 0.039             | 0.217        | 0.245                  | 0.186        |
| Run 1 | 1/16/2019 10:31 | 1.159                      | 0.045        | 0.049        | 0.056        | 0.056             | 0.216        | 0.261                  | 0.187        |
| Run 1 | 1/16/2019 10:32 | 1.103                      | 0.046        | 0.000        | 0.060        | 0.016             | 0.216        | 0.268                  | 0.191        |
| Run 1 | 1/16/2019 10:33 | 1.040                      | 0.046        | 0.047        | 0.057        | 0.000             | 0.212        | 0.254                  | 0.186        |
| Run 1 | 1/16/2019 10:34 | 1.128                      | 0.045        | 0.049        | 0.055        | 0.027             | 0.217        | 0.074                  | 0.188        |
| Run 1 | 1/16/2019 10:35 | 1.072                      | 0.046        | 0.020        | 0.058        | 0.009             | 0.216        | 0.387                  | 0.185        |
| Run 1 | 1/16/2019 10:36 | 0.869                      | 0.045        | 0.032        | 0.058        | 0.000             | 0.214        | 0.049                  | 0.184        |
| Run 1 | 1/16/2019 10:37 | 0.735                      | 0.046        | 0.000        | 0.056        | 0.000             | 0.212        | 0.245                  | 0.185        |
| Run 1 | 1/16/2019 10:38 | 0.986                      | 0.045        | 0.002        | 0.055        | 0.005             | 0.212        | 0.164                  | 0.181        |
| Run 1 | 1/16/2019 10:39 | 1.021                      | 0.046        | 0.043        | 0.056        | 0.023             | 0.209        | 0.039                  | 0.183        |
| Run 1 | 1/16/2019 10:40 | 0.782                      | 0.046        | 0.017        | 0.059        | 0.000             | 0.212        | 0.138                  | 0.190        |
| Run 1 | 1/16/2019 10:41 | 0.789                      | 0.044        | 0.000        | 0.056        | 0.029             | 0.211        | 0.156                  | 0.180        |
| Run 1 | 1/16/2019 10:42 | 0.766                      | 0.044        | 0.014        | 0.056        | 0.000             | 0.208        | 0.032                  | 0.183        |
| Run 1 | 1/16/2019 10:43 | 0.839                      | 0.042        | 0.045        | 0.053        | 0.000             | 0.210        | 0.219                  | 0.177        |
| Run 1 | 1/16/2019 10:44 | 0.875                      | 0.045        | 0.004        | 0.059        | 0.023             | 0.209        | 0.328                  | 0.189        |
| Run 1 | 1/16/2019 10:45 | 0.613                      | 0.044        | 0.058        | 0.056        | 0.012             | 0.209        | 0.233                  | 0.181        |
| Run 1 | 1/16/2019 10:46 | 0.616                      | 0.043        | 0.000        | 0.054        | 0.000             | 0.208        | 0.104                  | 0.181        |
| Run 1 | 1/16/2019 10:47 | 0.920                      | 0.044        | 0.000        | 0.057        | 0.038             | 0.207        | 0.057                  | 0.179        |
| Run 1 | 1/16/2019 10:48 | 0.901                      | 0.044        | 0.025        | 0.057        | 0.014             | 0.208        | 0.132                  | 0.182        |
| Run 1 | 1/16/2019 10:49 | 0.754                      | 0.043        | 0.001        | 0.052        | 0.040             | 0.208        | 0.156                  | 0.175        |
| Run 1 | 1/16/2019 10:50 | 0.725                      | 0.044        | 0.000        | 0.055        | 0.000             | 0.206        | 0.274                  | 0.179        |
| Run 1 | 1/16/2019 10:51 | 0.698                      | 0.043        | 0.000        | 0.055        | 0.030             | 0.205        | 0.115                  | 0.180        |
| Run 1 | 1/16/2019 10:52 | 0.753                      | 0.041        | 0.043        | 0.050        | 0.003             | 0.171        | 0.044                  | 0.164        |
|       |                 |                            |              |              |              |                   |              |                        |              |
| Run 2 | 1/16/2019 12:28 | 0.725                      | 0.044        | 0.000        | 0.054        | 0.041             | 0.209        | 0.000                  | 0.180        |
| Run 2 | 1/16/2019 12:29 | 0.583                      | 0.042        | 0.000        | 0.051        | 0.055             | 0.211        | 0.000                  | 0.178        |
| Run 2 | 1/16/2019 12:30 | 0.550                      | 0.044        | 0.000        | 0.055        | 0.057             | 0.210        | 0.077                  | 0.178        |
| Run 2 | 1/16/2019 12:31 | 0.457                      | 0.043        | 0.000        | 0.054        | 0.067             | 0.208        | 0.232                  | 0.185        |
| Run 2 | 1/16/2019 12:32 | 0.603                      | 0.044        | 0.000        | 0.052        | 0.082             | 0.208        | 0.166                  | 0.181        |
| Run 2 | 1/16/2019 12:33 | 0.700                      | 0.044        | 0.000        | 0.055        | 0.113             | 0.208        | 0.149                  | 0.183        |
| Run 2 | 1/16/2019 12:34 | 0.556                      | 0.044        | 0.000        | 0.052        | 0.044             | 0.208        | 0.163                  | 0.185        |
| Run 2 | 1/16/2019 12:35 | 0.627                      | 0.042        | 0.000        | 0.052        | 0.039             | 0.208        | 0.193                  | 0.179        |
| Run 2 | 1/16/2019 12:36 | 0.771                      | 0.044        | 0.000        | 0.053        | 0.085             | 0.207        | 0.348                  | 0.182        |
| Run 2 | 1/16/2019 12:37 | 0.733                      | 0.043        | 0.000        | 0.054        | 0.116             | 0.209        | 0.071                  | 0.179        |
| Run 2 | 1/16/2019 12:38 | 0.659                      | 0.043        | 0.000        | 0.054        | 0.032             | 0.209        | 0.105                  | 0.181        |
| Run 2 | 1/16/2019 12:39 | 0.582                      | 0.044        | 0.000        | 0.057        | 0.080             | 0.208        | 0.106                  | 0.183        |
| Run 2 | 1/16/2019 12:40 | 0.484                      | 0.043        | 0.000        | 0.051        | 0.058             | 0.206        | 0.284                  | 0.178        |
| Run 2 | 1/16/2019 12:41 | 0.662                      | 0.043        | 0.000        | 0.054        | 0.092             | 0.207        | 0.233                  | 0.179        |
| Run 2 | 1/16/2019 12:42 | 0.678                      | 0.043        | 0.000        | 0.053        | 0.100             | 0.209        | 0.313                  | 0.179        |
| Run 2 | 1/16/2019 12:43 | 0.584                      | 0.043        | 0.000        | 0.052        | 0.055             | 0.209        | 0.143                  | 0.178        |
| Run 2 | 1/16/2019 12:44 | 0.642                      | 0.042        | 0.000        | 0.054        | 0.030             | 0.206        | 0.172                  | 0.173        |
| Run 2 | 1/16/2019 12:45 | 0.802                      | 0.043        | 0.000        | 0.055        | 0.065             | 0.207        | 0.333                  | 0.177        |
| Run 2 | 1/16/2019 12:46 | 0.751                      | 0.042        | 0.000        | 0.052        | 0.098             | 0.208        | 0.207                  | 0.177        |
| Run 2 | 1/16/2019 12:47 | 0.600                      | 0.042        | 0.000        | 0.052        | 0.045             | 0.209        | 0.089                  | 0.177        |
| Run 2 | 1/16/2019 12:48 | 0.521                      | 0.041        | 0.001        | 0.050        | 0.090             | 0.209        | 0.211                  | 0.174        |
| Run 2 | 1/16/2019 12:49 | 0.449                      | 0.042        | 0.000        | 0.053        | 0.083             | 0.207        | 0.018                  | 0.175        |
| Run 2 | 1/16/2019 12:50 | 0.597                      | 0.041        | 0.000        | 0.053        | 0.065             | 0.208        | 0.059                  | 0.176        |
| Run 2 | 1/16/2019 12:51 | 0.690                      | 0.042        | 0.000        | 0.051        | 0.097             | 0.208        | 0.083                  | 0.173        |
| Run 2 | 1/16/2019 12:52 | 0.648                      | 0.043        | 0.000        | 0.052        | 0.042             | 0.208        | 0.221                  | 0.176        |
| Run 2 | 1/16/2019 12:53 | 0.758                      | 0.042        | 0.000        | 0.050        | 0.059             | 0.207        | 0.101                  | 0.176        |

|       | Date            | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCl<br>(ppm) | SEC<br>(ppm) | Methanol<br>(ppm) | SEC<br>(ppm) | Acet-aldehyde<br>(ppm) | SEC<br>(ppm) |
|-------|-----------------|----------------------------|--------------|--------------|--------------|-------------------|--------------|------------------------|--------------|
| Run 2 | 1/16/2019 12:54 | 0.764                      | 0.042        | 0.000        | 0.053        | 0.077             | 0.206        | 0.181                  | 0.175        |
| Run 2 | 1/16/2019 12:55 | 0.776                      | 0.043        | 0.024        | 0.055        | 0.072             | 0.208        | 0.080                  | 0.180        |
| Run 2 | 1/16/2019 12:56 | 0.669                      | 0.046        | 0.000        | 0.055        | 0.083             | 0.209        | 0.123                  | 0.181        |
| Run 2 | 1/16/2019 12:57 | 0.523                      | 0.042        | 0.000        | 0.052        | 0.061             | 0.208        | 0.239                  | 0.174        |
| Run 2 | 1/16/2019 12:58 |                            |              |              |              |                   |              |                        |              |
| Run 2 | 1/16/2019 12:59 | 0.679                      | 0.042        | 0.000        | 0.049        | 0.120             | 0.208        | 0.465                  | 0.173        |
| Run 2 | 1/16/2019 13:00 | 0.719                      | 0.041        | 0.000        | 0.051        | 0.102             | 0.208        | 0.127                  | 0.173        |
| Run 2 | 1/16/2019 13:01 | 0.626                      | 0.040        | 0.000        | 0.050        | 0.053             | 0.209        | 0.141                  | 0.176        |
| Run 2 | 1/16/2019 13:02 | 0.772                      | 0.040        | 0.000        | 0.051        | 0.050             | 0.208        | 0.128                  | 0.174        |
| Run 2 | 1/16/2019 13:03 | 0.685                      | 0.042        | 0.000        | 0.051        | 0.093             | 0.208        | 0.137                  | 0.170        |
| Run 2 | 1/16/2019 13:04 | 0.716                      | 0.042        | 0.000        | 0.053        | 0.098             | 0.207        | 0.296                  | 0.174        |
| Run 2 | 1/16/2019 13:05 | 0.669                      | 0.044        | 0.000        | 0.054        | 0.092             | 0.208        | 0.145                  | 0.179        |
| Run 2 | 1/16/2019 13:06 | 0.494                      | 0.040        | 0.000        | 0.050        | 0.072             | 0.207        | 0.094                  | 0.171        |
| Run 2 | 1/16/2019 13:07 | 0.492                      | 0.040        | 0.000        | 0.049        | 0.046             | 0.205        | 0.133                  | 0.171        |
| Run 2 | 1/16/2019 13:08 | 0.673                      | 0.042        | 0.000        | 0.053        | 0.117             | 0.200        | 0.231                  | 0.177        |
| Run 2 | 1/16/2019 13:09 | 0.752                      | 0.041        | 0.000        | 0.051        | 0.098             | 0.199        | 0.186                  | 0.170        |
| Run 2 | 1/16/2019 13:10 | 0.661                      | 0.041        | 0.000        | 0.052        | 0.077             | 0.198        | 0.000                  | 0.173        |
| Run 2 | 1/16/2019 13:11 | 0.718                      | 0.042        | 0.000        | 0.048        | 0.034             | 0.200        | 0.300                  | 0.173        |
| Run 2 | 1/16/2019 13:12 | 0.621                      | 0.042        | 0.000        | 0.052        | 0.058             | 0.199        | 0.310                  | 0.177        |
| Run 2 | 1/16/2019 13:13 | 0.632                      | 0.041        | 0.000        | 0.052        | 0.069             | 0.204        | 0.068                  | 0.175        |
| Run 2 | 1/16/2019 13:14 | 0.574                      | 0.041        | 0.000        | 0.050        | 0.101             | 0.205        | 0.396                  | 0.174        |
| Run 2 | 1/16/2019 13:15 | 0.427                      | 0.041        | 0.000        | 0.050        | 0.061             | 0.202        | 0.118                  | 0.175        |
| Run 2 | 1/16/2019 13:16 | 0.456                      | 0.041        | 0.000        | 0.047        | 0.042             | 0.202        | 0.150                  | 0.170        |
| Run 2 | 1/16/2019 13:17 | 0.759                      | 0.042        | 0.000        | 0.050        | 0.127             | 0.200        | 0.309                  | 0.174        |
| Run 2 | 1/16/2019 13:18 | 0.816                      | 0.041        | 0.000        | 0.051        | 0.112             | 0.202        | 0.145                  | 0.175        |
| Run 2 | 1/16/2019 13:19 | 0.783                      | 0.041        | 0.020        | 0.049        | 0.028             | 0.207        | 0.260                  | 0.167        |
| Run 2 | 1/16/2019 13:20 | 0.753                      | 0.042        | 0.000        | 0.050        | 0.104             | 0.207        | 0.056                  | 0.175        |
| Run 2 | 1/16/2019 13:21 | 0.580                      | 0.039        | 0.043        | 0.050        | 0.059             | 0.206        | 0.113                  | 0.173        |
| Run 2 | 1/16/2019 13:22 | 0.670                      | 0.042        | 0.000        | 0.050        | 0.091             | 0.207        | 0.092                  | 0.177        |
| Run 2 | 1/16/2019 13:23 | 0.576                      | 0.042        | 0.000        | 0.051        | 0.105             | 0.208        | 0.231                  | 0.175        |
| Run 2 | 1/16/2019 13:24 | 0.512                      | 0.043        | 0.000        | 0.052        | 0.059             | 0.209        | 0.000                  | 0.179        |
| Run 2 | 1/16/2019 13:25 | 0.553                      | 0.042        | 0.000        | 0.053        | 0.070             | 0.208        | 0.146                  | 0.175        |
| Run 2 | 1/16/2019 13:26 | 0.717                      | 0.041        | 0.018        | 0.051        | 0.136             | 0.207        | 0.000                  | 0.177        |
| Run 2 | 1/16/2019 13:27 | 0.767                      | 0.042        | 0.000        | 0.053        | 0.105             | 0.208        | 0.189                  | 0.181        |
| Run 2 | 1/16/2019 13:28 | 0.315                      | 0.044        | 0.000        | 0.051        | 0.064             | 0.105        | 0.323                  | 0.172        |
| Run 2 | 1/16/2019 13:29 |                            |              |              |              |                   |              |                        |              |
|       |                 |                            |              |              |              |                   |              |                        |              |
| Run 3 | 1/16/2019 14:07 | 0.606                      | 0.040        | 0.000        | 0.048        | 0.075             | 0.204        | 0.136                  | 0.167        |
| Run 3 | 1/16/2019 14:08 | 0.520                      | 0.041        | 0.000        | 0.050        | 0.094             | 0.204        | 0.182                  | 0.170        |
| Run 3 | 1/16/2019 14:09 | 0.460                      | 0.040        | 0.015        | 0.048        | 0.040             | 0.206        | 0.000                  | 0.170        |
| Run 3 | 1/16/2019 14:10 | 0.446                      | 0.041        | 0.000        | 0.053        | 0.088             | 0.204        | 0.023                  | 0.173        |
| Run 3 | 1/16/2019 14:11 | 0.311                      | 0.042        | 0.000        | 0.053        | 0.083             | 0.204        | 0.168                  | 0.170        |
| Run 3 | 1/16/2019 14:12 | 0.461                      | 0.043        | 0.000        | 0.051        | 0.096             | 0.205        | 0.203                  | 0.174        |
| Run 3 | 1/16/2019 14:13 | 0.465                      | 0.043        | 0.000        | 0.052        | 0.129             | 0.205        | 0.134                  | 0.181        |
| Run 3 | 1/16/2019 14:14 | 0.293                      | 0.040        | 0.000        | 0.051        | 0.032             | 0.205        | 0.003                  | 0.168        |
| Run 3 | 1/16/2019 14:15 | 0.323                      | 0.042        | 0.000        | 0.052        | 0.074             | 0.205        | 0.154                  | 0.170        |
| Run 3 | 1/16/2019 14:16 | 0.394                      | 0.041        | 0.000        | 0.052        | 0.115             | 0.205        | 0.038                  | 0.174        |
| Run 3 | 1/16/2019 14:17 | 0.427                      | 0.042        | 0.000        | 0.055        | 0.101             | 0.204        | 0.204                  | 0.170        |
| Run 3 | 1/16/2019 14:18 | 0.396                      | 0.041        | 0.000        | 0.049        | 0.062             | 0.205        | 0.336                  | 0.166        |
| Run 3 | 1/16/2019 14:19 | 0.493                      | 0.041        | 0.000        | 0.049        | 0.082             | 0.204        | 0.045                  | 0.165        |
| Run 3 | 1/16/2019 14:20 | 0.391                      | 0.041        | 0.000        | 0.051        | 0.060             | 0.204        | 0.204                  | 0.168        |
| Run 3 | 1/16/2019 14:21 | 0.484                      | 0.040        | 0.000        | 0.048        | 0.084             | 0.203        | 0.085                  | 0.167        |

|         | Date            | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCl<br>(ppm) | SEC<br>(ppm) | Methanol<br>(ppm) | SEC<br>(ppm) | Acet-aldehyde<br>(ppm) | SEC<br>(ppm) |
|---------|-----------------|----------------------------|--------------|--------------|--------------|-------------------|--------------|------------------------|--------------|
| Run 3   | 1/16/2019 14:22 | 0.470                      | 0.041        | 0.000        | 0.048        | 0.100             | 0.204        | 0.122                  | 0.170        |
| Run 3   | 1/16/2019 14:23 | 0.297                      | 0.041        | 0.000        | 0.051        | 0.051             | 0.206        | 0.178                  | 0.171        |
| Run 3   | 1/16/2019 14:24 | 0.376                      | 0.041        | 0.000        | 0.053        | 0.084             | 0.204        | 0.000                  | 0.171        |
| Run 3   | 1/16/2019 14:25 | 0.394                      | 0.042        | 0.000        | 0.052        | 0.053             | 0.205        | 0.098                  | 0.173        |
| Run 3   | 1/16/2019 14:26 | 0.424                      | 0.041        | 0.000        | 0.049        | 0.093             | 0.205        | 0.024                  | 0.169        |
| Run 3   | 1/16/2019 14:27 | 0.388                      | 0.042        | 0.000        | 0.051        | 0.097             | 0.206        | 0.180                  | 0.173        |
| Run 3   | 1/16/2019 14:28 | 0.371                      | 0.043        | 0.000        | 0.053        | 0.094             | 0.206        | 0.000                  | 0.180        |
| Run 3   | 1/16/2019 14:29 | 0.299                      | 0.041        | 0.000        | 0.049        | 0.037             | 0.204        | 0.078                  | 0.172        |
| Run 3   | 1/16/2019 14:30 | 0.592                      | 0.040        | 0.000        | 0.047        | 0.097             | 0.203        | 0.164                  | 0.165        |
| Run 3   | 1/16/2019 14:31 | 0.489                      | 0.042        | 0.000        | 0.053        | 0.127             | 0.205        | 0.286                  | 0.171        |
| Run 3   | 1/16/2019 14:32 | 0.322                      | 0.041        | 0.000        | 0.053        | 0.052             | 0.205        | 0.108                  | 0.173        |
| Run 3   | 1/16/2019 14:33 | 0.347                      | 0.041        | 0.000        | 0.050        | 0.072             | 0.203        | 0.227                  | 0.171        |
| Run 3   | 1/16/2019 14:34 | 0.355                      | 0.039        | 0.000        | 0.049        | 0.114             | 0.200        | 0.000                  | 0.167        |
| Run 3   | 1/16/2019 14:35 | 0.320                      | 0.039        | 0.000        | 0.049        | 0.126             | 0.202        | 0.000                  | 0.165        |
| Run 3   | 1/16/2019 14:36 | 0.392                      | 0.038        | 0.000        | 0.048        | 0.097             | 0.201        | 0.147                  | 0.163        |
| Run 3   | 1/16/2019 14:37 | 0.288                      | 0.041        | 0.000        | 0.051        | 0.061             | 0.202        | 0.074                  | 0.170        |
| Run 3   | 1/16/2019 14:38 | 0.209                      | 0.038        | 0.006        | 0.052        | 0.061             | 0.172        | 0.000                  | 0.160        |
| Run 3   | 1/16/2019 14:39 |                            |              |              |              |                   |              |                        |              |
| Run 3   | 1/16/2019 14:49 | 0.634                      | 0.043        | 0.000        | 0.050        | 0.120             | 0.201        | 0.202                  | 0.169        |
| Run 3   | 1/16/2019 14:50 | 0.659                      | 0.040        | 0.000        | 0.049        | 0.036             | 0.204        | 0.050                  | 0.170        |
| Run 3   | 1/16/2019 14:51 | 0.733                      | 0.041        | 0.000        | 0.048        | 0.084             | 0.202        | 0.199                  | 0.169        |
| Run 3   | 1/16/2019 14:52 | 0.734                      | 0.041        | 0.000        | 0.053        | 0.100             | 0.200        | 0.286                  | 0.171        |
| Run 3   | 1/16/2019 14:53 | 0.729                      | 0.039        | 0.000        | 0.046        | 0.077             | 0.203        | 0.000                  | 0.169        |
| Run 3   | 1/16/2019 14:54 | 0.588                      | 0.040        | 0.000        | 0.047        | 0.117             | 0.203        | 0.217                  | 0.162        |
| Run 3   | 1/16/2019 14:55 | 0.397                      | 0.041        | 0.000        | 0.050        | 0.095             | 0.203        | 0.000                  | 0.172        |
| Run 3   | 1/16/2019 14:56 | 0.398                      | 0.040        | 0.000        | 0.050        | 0.035             | 0.202        | 0.000                  | 0.167        |
| Run 3   | 1/16/2019 14:57 | 0.592                      | 0.040        | 0.000        | 0.046        | 0.128             | 0.199        | 0.072                  | 0.162        |
| Run 3   | 1/16/2019 14:58 | 0.832                      | 0.041        | 0.000        | 0.051        | 0.081             | 0.202        | 0.156                  | 0.168        |
| Run 3   | 1/16/2019 14:59 | 0.772                      | 0.042        | 0.000        | 0.049        | 0.079             | 0.203        | 0.203                  | 0.170        |
| Run 3   | 1/16/2019 15:00 | 0.686                      | 0.040        | 0.000        | 0.049        | 0.058             | 0.203        | 0.019                  | 0.168        |
| Run 3   | 1/16/2019 15:01 | 0.525                      | 0.040        | 0.000        | 0.048        | 0.086             | 0.202        | 0.000                  | 0.166        |
| Run 3   | 1/16/2019 15:02 | 0.570                      | 0.040        | 0.000        | 0.049        | 0.097             | 0.203        | 0.000                  | 0.167        |
| Run 3   | 1/16/2019 15:03 | 0.501                      | 0.039        | 0.000        | 0.050        | 0.128             | 0.201        | 0.000                  | 0.167        |
| Run 3   | 1/16/2019 15:04 | 0.387                      | 0.040        | 0.000        | 0.048        | 0.080             | 0.203        | 0.024                  | 0.168        |
| Run 3   | 1/16/2019 15:05 | 0.492                      | 0.040        | 0.000        | 0.049        | 0.065             | 0.202        | 0.000                  | 0.165        |
| Run 3   | 1/16/2019 15:06 | 0.660                      | 0.042        | 0.000        | 0.052        | 0.103             | 0.201        | 0.067                  | 0.170        |
| Run 3   | 1/16/2019 15:07 | 0.758                      | 0.041        | 0.000        | 0.051        | 0.091             | 0.202        | 0.127                  | 0.173        |
| Run 3   | 1/16/2019 15:08 | 0.816                      | 0.039        | 0.000        | 0.048        | 0.084             | 0.202        | 0.000                  | 0.166        |
| Run 3   | 1/16/2019 15:09 | 0.890                      | 0.041        | 0.000        | 0.050        | 0.061             | 0.200        | 0.000                  | 0.172        |
| Run 3   | 1/16/2019 15:10 | 0.696                      | 0.041        | 0.001        | 0.048        | 0.082             | 0.200        | 0.100                  | 0.167        |
| Run 3   | 1/16/2019 15:11 | 0.704                      | 0.040        | 0.000        | 0.048        | 0.099             | 0.200        | 0.000                  | 0.165        |
| Run 3   | 1/16/2019 15:12 | 0.515                      | 0.038        | 0.000        | 0.050        | 0.108             | 0.200        | 0.317                  | 0.163        |
| Run 3   | 1/16/2019 15:13 | 0.338                      | 0.040        | 0.000        | 0.047        | 0.075             | 0.200        | 0.241                  | 0.162        |
| Run 3   | 1/16/2019 15:14 | 0.346                      | 0.040        | 0.000        | 0.051        | 0.064             | 0.202        | 0.174                  | 0.167        |
| Run 3   | 1/16/2019 15:15 | 0.317                      | 0.041        | 0.000        | 0.050        | 0.134             | 0.199        | 0.222                  | 0.170        |
| Run 3   | 1/16/2019 15:16 | 0.395                      | 0.039        | 0.000        | 0.048        | 0.124             | 0.200        | 0.021                  | 0.163        |
| Run 3   | 1/16/2019 15:17 | 0.380                      | 0.040        | 0.000        | 0.054        | 0.097             | 0.203        | 0.187                  | 0.170        |
| Run 3   | 1/16/2019 15:18 | 0.297                      | 0.038        | 0.000        | 0.047        | 0.112             | 0.201        | 0.000                  | 0.161        |
| Run 3   | 1/16/2019 15:19 | 0.281                      | 0.040        | 0.000        | 0.051        | 0.072             | 0.201        | 0.055                  | 0.170        |
| Average |                 | 0.454                      | 0.040        | 0.006        | 0.050        | 0.083             | 0.195        | 0.100                  | 0.167        |



|       | Date            | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCl<br>(ppm) | SEC<br>(ppm) | Methanol<br>(ppm) | SEC<br>(ppm) | Acet-aldehyde<br>(ppm) | SEC<br>(ppm) |
|-------|-----------------|----------------------------|--------------|--------------|--------------|-------------------|--------------|------------------------|--------------|
| Run 4 | 1/16/2019 15:45 | 0.358                      | 0.039        | 0.000        | 0.048        | 0.065             | 0.203        | 0.000                  | 0.168        |
| Run 4 | 1/16/2019 15:46 | 0.284                      | 0.041        | 0.000        | 0.049        | 0.056             | 0.200        | 0.092                  | 0.174        |
| Run 4 | 1/16/2019 15:47 | 0.395                      | 0.041        | 0.000        | 0.049        | 0.110             | 0.199        | 0.240                  | 0.166        |
| Run 4 | 1/16/2019 15:48 | 0.389                      | 0.040        | 0.000        | 0.047        | 0.114             | 0.200        | 0.145                  | 0.165        |
| Run 4 | 1/16/2019 15:49 | 0.300                      | 0.040        | 0.000        | 0.050        | 0.103             | 0.200        | 0.278                  | 0.167        |
| Run 4 | 1/16/2019 15:50 | 0.255                      | 0.038        | 0.000        | 0.049        | 0.013             | 0.201        | 0.025                  | 0.165        |
| Run 4 | 1/16/2019 15:51 | 0.261                      | 0.043        | 0.000        | 0.051        | 0.081             | 0.199        | 0.131                  | 0.175        |
| Run 4 | 1/16/2019 15:52 | 0.377                      | 0.040        | 0.000        | 0.046        | 0.109             | 0.200        | 0.192                  | 0.164        |
| Run 4 | 1/16/2019 15:53 | 0.402                      | 0.040        | 0.000        | 0.051        | 0.170             | 0.201        | 0.195                  | 0.170        |
| Run 4 | 1/16/2019 15:54 | 0.289                      | 0.041        | 0.000        | 0.049        | 0.054             | 0.201        | 0.081                  | 0.169        |
| Run 4 | 1/16/2019 15:55 | 0.393                      | 0.042        | 0.000        | 0.055        | 0.068             | 0.200        | 0.384                  | 0.169        |
| Run 4 | 1/16/2019 15:56 | 0.422                      | 0.039        | 0.000        | 0.047        | 0.123             | 0.201        | 0.157                  | 0.162        |
| Run 4 | 1/16/2019 15:57 | 0.414                      | 0.040        | 0.000        | 0.048        | 0.114             | 0.202        | 0.182                  | 0.162        |
| Run 4 | 1/16/2019 15:58 | 0.359                      | 0.040        | 0.000        | 0.049        | 0.081             | 0.202        | 0.106                  | 0.162        |
| Run 4 | 1/16/2019 15:59 | 0.282                      | 0.040        | 0.000        | 0.048        | 0.049             | 0.202        | 0.056                  | 0.169        |
| Run 4 | 1/16/2019 16:00 | 0.243                      | 0.039        | 0.000        | 0.047        | 0.069             | 0.203        | 0.109                  | 0.163        |
| Run 4 | 1/16/2019 16:01 | 0.321                      | 0.040        | 0.000        | 0.050        | 0.106             | 0.201        | 0.180                  | 0.164        |
| Run 4 | 1/16/2019 16:02 | 0.324                      | 0.041        | 0.000        | 0.051        | 0.104             | 0.202        | 0.194                  | 0.165        |
| Run 4 | 1/16/2019 16:03 | 0.274                      | 0.039        | 0.000        | 0.049        | 0.035             | 0.206        | 0.140                  | 0.166        |
| Run 4 | 1/16/2019 16:04 | 0.287                      | 0.041        | 0.005        | 0.050        | 0.065             | 0.205        | 0.209                  | 0.168        |
| Run 4 | 1/16/2019 16:05 | 0.403                      | 0.041        | 0.000        | 0.050        | 0.124             | 0.202        | 0.045                  | 0.169        |
| Run 4 | 1/16/2019 16:06 | 0.451                      | 0.039        | 0.000        | 0.053        | 0.121             | 0.203        | 0.322                  | 0.163        |
| Run 4 | 1/16/2019 16:07 | 0.470                      | 0.041        | 0.000        | 0.052        | 0.101             | 0.205        | 0.111                  | 0.171        |
| Run 4 | 1/16/2019 16:08 | 0.334                      | 0.039        | 0.000        | 0.048        | 0.065             | 0.205        | 0.071                  | 0.165        |
| Run 4 | 1/16/2019 16:09 | 0.221                      | 0.040        | 0.000        | 0.048        | 0.071             | 0.202        | 0.103                  | 0.167        |
| Run 4 | 1/16/2019 16:10 | 0.372                      | 0.040        | 0.000        | 0.048        | 0.131             | 0.203        | 0.328                  | 0.171        |
| Run 4 | 1/16/2019 16:11 | 0.351                      | 0.040        | 0.000        | 0.051        | 0.124             | 0.205        | 0.063                  | 0.165        |
| Run 4 | 1/16/2019 16:12 | 0.266                      | 0.041        | 0.000        | 0.052        | 0.048             | 0.203        | 0.183                  | 0.174        |
| Run 4 | 1/16/2019 16:13 | 0.282                      | 0.040        | 0.000        | 0.048        | 0.072             | 0.203        | 0.244                  | 0.168        |
| Run 4 | 1/16/2019 16:14 | 0.251                      | 0.041        | 0.000        | 0.049        | 0.056             | 0.189        | 0.182                  | 0.167        |
| Run 4 | 1/16/2019 16:15 |                            |              |              |              |                   |              |                        |              |
| Run 4 | 1/16/2019 16:28 | 0.838                      | 0.041        | 0.000        | 0.053        | 0.111             | 0.203        | 0.266                  | 0.167        |
| Run 4 | 1/16/2019 16:29 | 0.960                      | 0.042        | 0.000        | 0.051        | 0.112             | 0.204        | 0.318                  | 0.178        |
| Run 4 | 1/16/2019 16:30 | 0.884                      | 0.040        | 0.000        | 0.053        | 0.051             | 0.205        | 0.172                  | 0.169        |
| Run 4 | 1/16/2019 16:31 | 0.866                      | 0.040        | 0.000        | 0.051        | 0.073             | 0.204        | 0.303                  | 0.171        |
| Run 4 | 1/16/2019 16:32 | 0.633                      | 0.042        | 0.000        | 0.053        | 0.066             | 0.204        | 0.316                  | 0.176        |
| Run 4 | 1/16/2019 16:33 | 0.645                      | 0.040        | 0.000        | 0.050        | 0.099             | 0.205        | 0.014                  | 0.172        |
| Run 4 | 1/16/2019 16:34 | 0.583                      | 0.041        | 0.000        | 0.050        | 0.102             | 0.206        | 0.188                  | 0.167        |
| Run 4 | 1/16/2019 16:35 | 0.534                      | 0.040        | 0.000        | 0.051        | 0.047             | 0.207        | 0.018                  | 0.170        |
| Run 4 | 1/16/2019 16:36 | 0.501                      | 0.040        | 0.000        | 0.049        | 0.043             | 0.205        | 0.018                  | 0.168        |
| Run 4 | 1/16/2019 16:37 | 0.673                      | 0.041        | 0.000        | 0.051        | 0.124             | 0.204        | 0.248                  | 0.165        |
| Run 4 | 1/16/2019 16:38 | 0.764                      | 0.042        | 0.000        | 0.050        | 0.062             | 0.203        | 0.232                  | 0.167        |
| Run 4 | 1/16/2019 16:39 | 0.682                      | 0.041        | 0.000        | 0.052        | 0.058             | 0.205        | 0.292                  | 0.173        |
| Run 4 | 1/16/2019 16:40 | 0.607                      | 0.042        | 0.000        | 0.052        | 0.042             | 0.205        | 0.242                  | 0.173        |
| Run 4 | 1/16/2019 16:41 | 0.460                      | 0.041        | 0.000        | 0.049        | 0.049             | 0.204        | 0.117                  | 0.171        |
| Run 4 | 1/16/2019 16:42 | 0.551                      | 0.039        | 0.000        | 0.050        | 0.085             | 0.204        | 0.000                  | 0.168        |
| Run 4 | 1/16/2019 16:43 | 0.566                      | 0.040        | 0.000        | 0.049        | 0.077             | 0.205        | 0.129                  | 0.169        |
| Run 4 | 1/16/2019 16:44 | 0.483                      | 0.042        | 0.000        | 0.053        | 0.047             | 0.204        | 0.000                  | 0.176        |
| Run 4 | 1/16/2019 16:45 | 0.561                      | 0.041        | 0.000        | 0.052        | 0.051             | 0.204        | 0.131                  | 0.169        |
| Run 4 | 1/16/2019 16:46 | 0.717                      | 0.040        | 0.000        | 0.050        | 0.087             | 0.204        | 0.000                  | 0.174        |

|         | Date            | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCl<br>(ppm) | SEC<br>(ppm) | Methanol<br>(ppm) | SEC<br>(ppm) | Acet-aldehyde<br>(ppm) | SEC<br>(ppm) |
|---------|-----------------|----------------------------|--------------|--------------|--------------|-------------------|--------------|------------------------|--------------|
| Run 4   | 1/16/2019 16:47 | 0.685                      | 0.042        | 0.000        | 0.051        | 0.107             | 0.204        | 0.000                  | 0.172        |
| Run 4   | 1/16/2019 16:48 | 0.702                      | 0.041        | 0.000        | 0.050        | 0.034             | 0.203        | 0.086                  | 0.170        |
| Run 4   | 1/16/2019 16:49 | 0.516                      | 0.042        | 0.000        | 0.050        | 0.042             | 0.205        | 0.014                  | 0.178        |
| Run 4   | 1/16/2019 16:50 | 0.373                      | 0.040        | 0.000        | 0.050        | 0.059             | 0.203        | 0.000                  | 0.175        |
| Run 4   | 1/16/2019 16:51 | 0.584                      | 0.042        | 0.000        | 0.051        | 0.130             | 0.205        | 0.128                  | 0.177        |
| Run 4   | 1/16/2019 16:52 | 0.604                      | 0.041        | 0.000        | 0.049        | 0.069             | 0.203        | 0.095                  | 0.174        |
| Run 4   | 1/16/2019 16:53 | 0.461                      | 0.041        | 0.000        | 0.049        | 0.045             | 0.203        | 0.144                  | 0.175        |
| Run 4   | 1/16/2019 16:54 | 0.499                      | 0.039        | 0.000        | 0.047        | 0.056             | 0.202        | 0.344                  | 0.164        |
| Run 4   | 1/16/2019 16:55 | 0.422                      | 0.039        | 0.000        | 0.049        | 0.129             | 0.201        | 0.158                  | 0.168        |
| Run 4   | 1/16/2019 16:56 | 0.389                      | 0.038        | 0.000        | 0.050        | 0.072             | 0.185        | 0.000                  | 0.172        |
| Run 4   | 1/16/2019 16:57 | 0.000                      | 0.051        | 0.014        | 0.049        | 0.020             | 0.039        | 0.436                  | 0.189        |
| Average |                 | 0.436                      | 0.040        | 0.006        | 0.050        | 0.075             | 0.190        | 0.147                  | 0.168        |
|         |                 |                            |              |              |              |                   |              |                        |              |
| Run 5   | 1/16/2019 18:35 | 0.681                      | 0.04         | 0            | 0.052        | 0.112             | 0.196        | 0.371                  | 0.172        |
| Run 5   | 1/16/2019 18:36 | 0.678                      | 0.041        | 0            | 0.051        | 0.125             | 0.198        | 0.174                  | 0.174        |
| Run 5   | 1/16/2019 18:37 | 0.748                      | 0.041        | 0            | 0.05         | 0.128             | 0.201        | 0.334                  | 0.168        |
| Run 5   | 1/16/2019 18:38 | 0.561                      | 0.04         | 0            | 0.051        | 0.09              | 0.201        | 0.193                  | 0.168        |
| Run 5   | 1/16/2019 18:39 | 0.605                      | 0.041        | 0            | 0.049        | 0.078             | 0.2          | 0.213                  | 0.169        |
| Run 5   | 1/16/2019 18:40 | 0.751                      | 0.042        | 0            | 0.05         | 0.148             | 0.2          | 0.333                  | 0.173        |
| Run 5   | 1/16/2019 18:41 | 0.832                      | 0.042        | 0            | 0.051        | 0.123             | 0.202        | 0.193                  | 0.176        |
| Run 5   | 1/16/2019 18:42 | 0.71                       | 0.041        | 0            | 0.053        | 0.084             | 0.203        | 0.34                   | 0.175        |
| Run 5   | 1/16/2019 18:43 | 0.759                      | 0.042        | 0            | 0.05         | 0.084             | 0.201        | 0.303                  | 0.174        |
| Run 5   | 1/16/2019 18:44 | 0.672                      | 0.04         | 0            | 0.052        | 0.095             | 0.201        | 0                      | 0.17         |
| Run 5   | 1/16/2019 18:45 | 0.721                      | 0.042        | 0            | 0.054        | 0.062             | 0.196        | 0.219                  | 0.171        |
| Run 5   | 1/16/2019 18:46 |                            |              |              |              |                   |              |                        |              |
| Run 5   | 1/16/2019 18:47 |                            |              |              |              |                   |              |                        |              |
| Run 5   | 1/16/2019 18:48 |                            |              |              |              |                   |              |                        |              |
| Run 5   | 1/16/2019 18:49 |                            |              |              |              |                   |              |                        |              |
| Run 5   | 1/16/2019 18:50 |                            |              |              |              |                   |              |                        |              |
| Run 5   | 1/16/2019 18:51 | 0.797                      | 0.04         | 0            | 0.049        | 0.115             | 0.201        | 0.401                  | 0.169        |
| Run 5   | 1/16/2019 18:52 |                            |              |              |              |                   |              |                        |              |
| Run 5   | 1/16/2019 18:53 |                            |              |              |              |                   |              |                        |              |
| Run 5   | 1/16/2019 18:54 |                            |              |              |              |                   |              |                        |              |
| Run 5   | 1/16/2019 18:55 | 0.747                      | 0.04         | 0            | 0.051        | 0.155             | 0.2          | 0.368                  | 0.169        |
| Run 5   | 1/16/2019 18:56 | 0.65                       | 0.041        | 0            | 0.051        | 0.113             | 0.202        | 0.192                  | 0.176        |
| Run 5   | 1/16/2019 18:57 | 0.759                      | 0.043        | 0            | 0.052        | 0.073             | 0.198        | 0.271                  | 0.178        |
| Run 5   | 1/16/2019 18:58 | 0.781                      | 0.042        | 0            | 0.054        | 0.114             | 0.189        | 0.282                  | 0.172        |
| Run 5   | 1/16/2019 18:59 | 0.755                      | 0.041        | 0            | 0.051        | 0.106             | 0.186        | 0.465                  | 0.167        |
| Run 5   | 1/16/2019 19:00 | 0.671                      | 0.04         | 0            | 0.049        | 0.103             | 0.174        | 0.325                  | 0.165        |
| Run 5   | 1/16/2019 19:01 |                            |              |              |              |                   |              |                        |              |
| Run 5   | 1/16/2019 19:02 |                            |              |              |              |                   |              |                        |              |
| Run 5   | 1/16/2019 19:03 |                            |              |              |              |                   |              |                        |              |
| Run 5   | 1/16/2019 19:04 |                            |              |              |              |                   |              |                        |              |
| Run 5   | 1/16/2019 19:05 |                            |              |              |              |                   |              |                        |              |
| Run 5   | 1/16/2019 19:06 |                            |              |              |              |                   |              |                        |              |
| Run 5   | 1/16/2019 19:07 |                            |              |              |              |                   |              |                        |              |
| Run 5   | 1/16/2019 19:08 | 0.684                      | 0.041        | 0            | 0.052        | 0.133             | 0.18         | 0.292                  | 0.165        |
| Run 5   | 1/16/2019 19:09 | 0.655                      | 0.042        | 0            | 0.053        | 0.112             | 0.172        | 0.168                  | 0.168        |
| Run 5   | 1/16/2019 19:10 | 0.513                      | 0.042        | 0            | 0.053        | 0.077             | 0.171        | 0.233                  | 0.169        |
| Run 5   | 1/16/2019 19:11 | 0.479                      | 0.04         | 0            | 0.052        | 0.077             | 0.176        | 0.137                  | 0.165        |



|       | Date            | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCl<br>(ppm) | SEC<br>(ppm) | Methanol<br>(ppm) | SEC<br>(ppm) | Acet-aldehyde<br>(ppm) | SEC<br>(ppm) |
|-------|-----------------|----------------------------|--------------|--------------|--------------|-------------------|--------------|------------------------|--------------|
| Run 5 | 1/16/2019 19:12 | 0.588                      | 0.042        | 0            | 0.053        | 0.124             | 0.185        | 0.251                  | 0.172        |
| Run 5 | 1/16/2019 19:13 | 0.679                      | 0.041        | 0            | 0.05         | 0.122             | 0.193        | 0.315                  | 0.168        |
| Run 5 | 1/16/2019 19:14 | 0.633                      | 0.042        | 0            | 0.052        | 0.096             | 0.19         | 0.148                  | 0.168        |
| Run 5 | 1/16/2019 19:15 | 0.747                      | 0.043        | 0            | 0.054        | 0.072             | 0.18         | 0.313                  | 0.176        |
| Run 5 | 1/16/2019 19:16 | 0.603                      | 0.041        | 0            | 0.05         | 0.148             | 0.177        | 0.046                  | 0.17         |
| Run 5 | 1/16/2019 19:17 | 0.664                      | 0.039        | 0            | 0.049        | 0.114             | 0.176        | 0.216                  | 0.167        |
| Run 5 | 1/16/2019 19:18 | 0.627                      | 0.039        | 0            | 0.051        | 0.108             | 0.184        | 0.246                  | 0.167        |
| Run 5 | 1/16/2019 19:19 | 0.51                       | 0.041        | 0            | 0.051        | 0.086             | 0.19         | 0.238                  | 0.169        |
| Run 5 | 1/16/2019 19:20 | 0.419                      | 0.041        | 0            | 0.052        | 0.067             | 0.135        | 0.185                  | 0.162        |
| Run 5 | 1/16/2019 19:21 | 0.231                      | 0.038        | 0.009        | 0.05         | 0.04              | 0.057        | 0.083                  | 0.15         |
| Run 5 | 1/16/2019 19:22 |                            |              |              |              |                   |              |                        |              |
| Run 5 | 1/16/2019 19:23 |                            |              |              |              |                   |              |                        |              |
| Run 5 | 1/16/2019 19:24 |                            |              |              |              |                   |              |                        |              |
| Run 5 | 1/16/2019 19:25 |                            |              |              |              |                   |              |                        |              |
| Run 5 | 1/16/2019 19:26 |                            |              |              |              |                   |              |                        |              |
| Run 5 | 1/16/2019 19:27 |                            |              |              |              |                   |              |                        |              |
| Run 5 | 1/16/2019 19:28 |                            |              |              |              |                   |              |                        |              |
| Run 5 | 1/16/2019 19:29 |                            |              |              |              |                   |              |                        |              |
| Run 5 | 1/16/2019 19:30 |                            |              |              |              |                   |              |                        |              |
| Run 5 | 1/16/2019 19:31 |                            |              |              |              |                   |              |                        |              |
| Run 5 | 1/16/2019 19:32 | 0.547                      | 0.041        | 0            | 0.052        | 0.107             | 0.19         | 0.258                  | 0.168        |
| Run 5 | 1/16/2019 19:33 | 0.567                      | 0.042        | 0            | 0.053        | 0.073             | 0.189        | 0.103                  | 0.167        |
| Run 5 | 1/16/2019 19:34 | 0.575                      | 0.042        | 0            | 0.055        | 0.091             | 0.187        | 0.372                  | 0.175        |
| Run 5 | 1/16/2019 19:35 | 0.741                      | 0.044        | 0            | 0.056        | 0.117             | 0.186        | 0.492                  | 0.175        |
| Run 5 | 1/16/2019 19:36 | 0.893                      | 0.042        | 0            | 0.054        | 0.132             | 0.187        | 0.301                  | 0.166        |
| Run 5 | 1/16/2019 19:37 | 0.886                      | 0.042        | 0            | 0.054        | 0.037             | 0.19         | 0.369                  | 0.171        |
| Run 5 | 1/16/2019 19:38 | 0.97                       | 0.042        | 0            | 0.053        | 0.046             | 0.187        | 0.426                  | 0.171        |
| Run 5 | 1/16/2019 19:39 | 1.047                      | 0.042        | 0            | 0.054        | 0.074             | 0.174        | 0.206                  | 0.173        |
| Run 5 | 1/16/2019 19:40 | 0.982                      | 0.041        | 0            | 0.053        | 0.114             | 0.184        | 0.498                  | 0.166        |
| Run 5 | 1/16/2019 19:41 | 0.873                      | 0.042        | 0            | 0.052        | 0.105             | 0.191        | 0.46                   | 0.171        |
| Run 5 | 1/16/2019 19:42 | 0.788                      | 0.039        | 0            | 0.05         | 0.074             | 0.195        | 0.271                  | 0.167        |
| Run 5 | 1/16/2019 19:43 | 0.783                      | 0.042        | 0            | 0.054        | 0.07              | 0.191        | 0.319                  | 0.174        |
| Run 5 | 1/16/2019 19:44 | 0.862                      | 0.042        | 0            | 0.051        | 0.116             | 0.191        | 0.268                  | 0.168        |
| Run 5 | 1/16/2019 19:45 | 0.936                      | 0.043        | 0            | 0.056        | 0.144             | 0.195        | 0.388                  | 0.174        |
| Run 5 | 1/16/2019 19:46 | 0.783                      | 0.041        | 0            | 0.051        | 0.063             | 0.193        | 0.409                  | 0.176        |
| Run 5 | 1/16/2019 19:47 | 0.768                      | 0.042        | 0            | 0.054        | 0.038             | 0.183        | 0.159                  | 0.173        |
| Run 5 | 1/16/2019 19:48 | 0.826                      | 0.042        | 0            | 0.053        | 0.087             | 0.191        | 0.234                  | 0.169        |
| Run 5 | 1/16/2019 19:49 | 0.852                      | 0.039        | 0            | 0.049        | 0.12              | 0.2          | 0.345                  | 0.169        |
| Run 5 | 1/16/2019 19:50 | 0.814                      | 0.04         | 0            | 0.049        | 0.092             | 0.198        | 0.48                   | 0.172        |
| Run 5 | 1/16/2019 19:51 | 0.673                      | 0.041        | 0            | 0.053        | 0.055             | 0.191        | 0.148                  | 0.17         |
| Run 5 | 1/16/2019 19:52 | 0.587                      | 0.041        | 0            | 0.052        | 0.082             | 0.196        | 0.204                  | 0.166        |
| Run 5 | 1/16/2019 19:53 | 0.861                      | 0.042        | 0            | 0.053        | 0.123             | 0.199        | 0.328                  | 0.177        |
| Run 5 | 1/16/2019 19:54 | 0.9                        | 0.041        | 0            | 0.051        | 0.148             | 0.201        | 0.484                  | 0.166        |
| Run 5 | 1/16/2019 19:55 | 0.868                      | 0.042        | 0            | 0.051        | 0.057             | 0.205        | 0.404                  | 0.173        |
| Run 5 | 1/16/2019 19:56 | 0.861                      | 0.042        | 0            | 0.051        | 0.073             | 0.206        | 0.617                  | 0.176        |
| Run 5 | 1/16/2019 19:57 | 0.921                      | 0.043        | 0            | 0.053        | 0.118             | 0.204        | 0.346                  | 0.177        |
| Run 5 | 1/16/2019 19:58 | 0.906                      | 0.042        | 0            | 0.054        | 0.143             | 0.207        | 0.544                  | 0.171        |
| Run 5 | 1/16/2019 19:59 | 0.872                      | 0.042        | 0            | 0.052        | 0.124             | 0.209        | 0.419                  | 0.173        |
| Run 5 | 1/16/2019 20:00 | 0.346                      | 0.038        | 0            | 0.049        | 0.052             | 0.107        | 0.246                  | 0.155        |

| Date    | Time | CTS Scan<br>(pathlength<br>) | SEC<br>(ppm) | Cell<br>Pressure<br>(psi) | Cell<br>Temp<br>(deg C) | Deviation<br>from<br>Previous | Deviation from<br>Average |
|---------|------|------------------------------|--------------|---------------------------|-------------------------|-------------------------------|---------------------------|
| 5-Dec   | 730  | 7.98                         | 0.111        | 14.7                      | 181                     | NA                            | 0.0%                      |
|         |      |                              |              |                           |                         | 100.0%                        | 100.0%                    |
| Average |      | 7.980                        | 0.111        |                           |                         |                               |                           |

| Date   | Time          | Direct Spike Results, Spike <sub>dir</sub> |           | System Spiked Result |           | Native Concentrations, Unspike |           | Dilution, DF | Expected Spike Conc., CS | Recovery |
|--------|---------------|--------------------------------------------|-----------|----------------------|-----------|--------------------------------|-----------|--------------|--------------------------|----------|
|        |               | (ppm HCl)                                  | (ppm SF6) | (ppm HCl)            | (ppm SF6) | (ppm HCl)                      | (ppm SF6) |              |                          |          |
| 15-Jan | 1530/<br>1633 | 45.63                                      | 2.21      | 3.391                | 0.198     | 0.153                          | -0.001    | 9.0%         | 4.2                      | 79.8%    |
|        |               |                                            |           |                      |           |                                |           |              |                          |          |
|        |               |                                            |           |                      |           |                                |           |              |                          |          |
|        |               |                                            |           |                      |           |                                |           |              |                          |          |
|        |               |                                            |           |                      |           |                                |           |              |                          |          |
|        |               |                                            |           |                      |           |                                |           |              |                          |          |
|        |               |                                            |           |                      |           |                                |           |              |                          |          |
|        |               |                                            |           |                      |           |                                |           |              |                          |          |

**APPENDIX II-D**  
**Methane Laboratory Report**

# Air Control Techniques, P.C.

301 East Durham Rd.  
Cary, NC 27513

Enviva - GRE  
Client Project # 2333

Analytical Report  
(0119-087)

*EPA Method 18(Bags)*  
Methane



**Enthalpy Analytical, LLC**

Phone: (919) 850 - 4392 / Fax: (919) 850 - 9012 / [www.enthalpy.com](http://www.enthalpy.com)  
800-1 Capitola Drive Durham, NC 27713-4385

I certify that to the best of my knowledge all analytical data presented in this report:

- Have been checked for completeness
- Are accurate, error-free, and legible
- Have been conducted in accordance with approved protocol, and that all deviations and analytical problems are summarized in the appropriate narrative(s)

This analytical report was prepared in Portable Document Format (.PDF) and contains 78 pages.

Quentisha L. Forrester

QA Review Performed by – Quentisha L. Forrester

Report Issued: 02/05/2019



# Summary of Results



## Enthalpy Analytical

Company: Air Control Techniques PC

Job No.: 0119-087 EPA Method 18 Tedlar Bag

Project No.: 2333 Enviva - GRE

## Summary Table

Sample ID / Concentration (ppm)

| Compound | <i>Run 1</i> | <i>Run 2</i> | <i>Run 3</i> | <i>Run 4</i> | <i>Run 5</i> |
|----------|--------------|--------------|--------------|--------------|--------------|
| Methane  | 3.85 J       | 3.75 J       | 3.78 J       | 2.98 J       | 3.68 J       |



# Results



## Enthalpy Analytical

Company: Air Control Techniques PC

Job No.: 0119-087 EPA Method 18 Tedlar Bag

Project No.: 2333 Enviva - GRE

ROSIEP082\_C1-C7.M

Analysis Method Used:

### Methane

| Sample ID   | Filename #1 | Filename #2 | Filename #3 | MDL   | Curve Min | Curve Max | Ret Time (min) | Ret Time (min) | Ret Time (min) | %dif RT | Conc #1 (ppm) | Conc #2 (ppm) | Conc #3 (ppm) | %dif conc | DF | Conc (ppm) | Spike Recovery | Adj. Conc (ppm) | Flag |
|-------------|-------------|-------------|-------------|-------|-----------|-----------|----------------|----------------|----------------|---------|---------------|---------------|---------------|-----------|----|------------|----------------|-----------------|------|
| S6-M18-1    | 020B0201.D  | 020B0202.D  | 020B0203.D  | 0.524 | 5.00      | 49,920    | 1.43           | 1.43           | 1.43           | 0.0     | 3.02          | 3.08          | 3.26          | 4.6       | 1  | 3.12       | 81.1%          | 3.85            | J    |
| S6-M18-2    | 021B0301.D  | 021B0302.D  | 021B0303.D  | 0.524 | 5.00      | 49,920    | 1.43           | 1.43           | 1.43           | 0.0     | 3.04          | 2.93          | 3.17          | 4.0       | 1  | 3.04       | 81.1%          | 3.75            | J    |
| S6-M18-3    | 022B0101.D  | 022B0102.D  | 022B0103.D  | 0.524 | 5.00      | 49,920    | 1.43           | 1.43           | 1.43           | 0.0     | 3.12          | 3.02          | 3.07          | 1.6       | 1  | 3.07       | 81.1%          | 3.78            | J    |
| S6-M18-4    | 019B0201.D  | 019B0202.D  | 019B0203.D  | 0.524 | 5.00      | 49,920    | 1.43           | 1.43           | 1.43           | 0.1     | 2.50          | 2.36          | 2.38          | 3.5       | 1  | 2.42       | 81.1%          | 2.98            | J    |
| S6-M18-5    | 019B0101.D  | 019B0102.D  | 019B0103.D  | 0.524 | 5.00      | 49,920    | 1.43           | 1.43           | 1.43           | 0.0     | 3.10          | 2.99          | 2.88          | 3.8       | 1  | 2.99       | 81.1%          | 3.68            | J    |
| S6-M18-1 SP | 019B0301.D  | 019B0302.D  | 019B0303.D  | 0.524 | 5.00      | 49,920    | 1.43           | 1.43           | 1.43           | 0.0     | 10.4          | 10.7          | 10.3          | 2.0       | 1  | 10.4       | 81.1%          |                 |      |

## Enthalpy Analytical

Company: Air Control Techniques PC

Job No.: 0119-087 EPA Method 18 Tedlar Bag

Project No.: 2333 Enviva - GRE

### Spiked Bag

| <b>Run 1 Spike</b> |                          | Methane      |
|--------------------|--------------------------|--------------|
| Before Spiking     | Inj1 (ppmv)              | 3.02         |
|                    | Inj2 (ppmv)              | 3.08         |
|                    | Inj3 (ppmv)              | 3.26         |
|                    | Avg ppmv                 | 3.12         |
|                    | Bag vol L NTP            | 3.44         |
| Gas Spike          | Cylinder                 | EB0091522    |
|                    | Expires                  | 9/26/21      |
|                    | Press/Temp               | 773.2 / 67.5 |
|                    | Vol (mL)                 | 350          |
|                    | Cyl Dil Factor           | 1            |
|                    | Cyl Conc (ppmv)          | 100          |
|                    | Vol (mL NTP)             | 356          |
|                    |                          | 0.0356       |
| Totals             | Sp Bag Vol L NTP         | 3.80         |
|                    | Corrected Initial (ppmv) | 2.83         |
|                    | Spike Amount (mL NTP)    | 0.0356       |
|                    | Spike Amount (ppmv)      | 9.39         |
|                    | Expected (ppmv)          | 12.2         |
| Result             | Inj1 (ppmv)              | 10.4         |
|                    | Inj2 (ppmv)              | 10.7         |
|                    | Inj3 (ppmv)              | 10.3         |
|                    | Avg (ppmv)               | 10.4         |
| <b>Recovery</b>    |                          | <b>81.1%</b> |

## Enthalpy Analytical

Company: Air Control Techniques PC

Job No.: 0119-087 EPA Method 18 Tedlar Bag

Project No.: 2333 Enviva - GRE

### Spike Hold Times

| Spiked Bag      | Time Spiked      | Spike Analyzed   | Hold Time (Hours) | Related Bag  | Related Bag Sampled Date | Bag Analyzed     | Hold Time (Hours) |
|-----------------|------------------|------------------|-------------------|--------------|--------------------------|------------------|-------------------|
| <b>Run 1 SP</b> | 01-22-2019 09:25 | 01-27-2019 15:43 | 126.3             | <b>Run 1</b> | 01-16-2019 10:00         | 01-21-2019 13:01 | 123.0             |
|                 |                  |                  |                   | <b>Run 2</b> | 01-16-2019 13:00         | 01-21-2019 14:06 | 121.1             |
|                 |                  |                  |                   | <b>Run 3</b> | 01-16-2019 15:00         | 01-21-2019 15:30 | 120.5             |
|                 |                  |                  |                   | <b>Run 4</b> | 01-16-2019 16:00         | 01-21-2019 16:35 | 120.6             |
|                 |                  |                  |                   | <b>Run 5</b> | 01-16-2019 19:00         | 01-21-2019 11:56 | 112.9             |

# Narrative Summary



## Enthalpy Analytical Narrative Summary

|                   |                              |
|-------------------|------------------------------|
| <b>Company</b>    | Air Control Techniques, P.C. |
| <b>Analyst</b>    | NBT                          |
| <b>Parameters</b> | EPA Method 18 Bags           |

|                  |          |
|------------------|----------|
| <b>Client #</b>  | 2333     |
| <b>Job #</b>     | 0119-087 |
| <b># Samples</b> | 5, 1 S&R |

### Custody

David Myers received the samples on 1/21/19 after being relinquished by Air Control Techniques, P.C. The samples were received at ambient temperature and in good condition though sample **S6-M18-5** was received with a the valve open. Prior to, during, and after analysis, the samples were kept under lock with access only to authorized personnel by Enthalpy Analytical, LLC.

### Analysis

The samples were analyzed for methane using the analytical procedures in EPA Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography (40 CFR Part 60, Appendix A).

All samples and standards were introduced directly to the column using an automated multi-port Valco gas sampling valve equipped with a stainless steel loop. Methane was referenced to certified gas phase standards.

The Gas Chromatograph "Rosie" was equipped with a Flame Ionization Detector for this analysis.

### Calibration

The calibration curve is included in the Raw Data section of this report. The data analysis method is referenced in the Analysis Method column on the Detailed Results page.

The first page of the curve contains all method specific parameters (i.e., curve type, origin, weight, etc.) used to quantify the samples. The calibration curve section also includes a table with the Retention Time (RetTime), Level (Lvl), Amount (corresponding units), Area, Response Factor (Amt/Area) and the analyte Name. The calibration table is used to identify (by retention time) and quantify each target compound.

### Chromatographic Conditions

The acquisition method (AQM\_ROSIEP080.M) is included in the Raw Data section of this report.

### QC Notes

As required by the method, a recovery study was performed. The bag sample **S6-M18-1** was spiked at 9:25AM on 1/22/19. The recovery efficiency values met the method-required limits of 70 to 130%. The recovery efficiency values were used to adjust the associated sample results following equation 18-7 of Method 18.



## Enthalpy Analytical Narrative Summary (continued)

### QC Notes (continued)

The analytes of interest were not identified in the analysis of the laboratory blank at concentrations greater than the detection limit.

### Reporting Notes

These analytical results are reported on a wet basis. The user of this report should determine the percent moisture in the sample and correct the reported value to ppmvd as appropriate.

The results presented in this report are representative of the samples as provided to the laboratory.

These analyses met the requirements of the TNI Standard. Any deviations from the requirements of the reference method or TNI Standard have been stated above.



## General Reporting Notes

The following are general reporting notes that are applicable to all Enthalpy Analytical, LLC data reports, unless specifically noted otherwise.

- Any analysis which refers to the method as “**Type**” represents a planned deviation from the reference method. For instance a Hydrogen Sulfide assay from a Tedlar bag would be labeled as “EPA Method 16-Type” because Tedlar bags are not mentioned as one of the collection options in EPA Method 16.
- The acronym **MDL** represents the Minimum Detection Limit. Below this value the laboratory cannot determine the presence of the analyte of interest reliably.
- The acronym **LOQ** represents the Limit of Quantification. Below this value the laboratory cannot quantitate the analyte of interest within the criteria of the method.
- The acronym **ND** following a value indicates a non-detect or analytical result below the MDL.
- The letter **J** in the Qualifier or Flag column in the results indicates that the value is between the MDL and the LOQ. The laboratory can positively identify the analyte of interest as present, but the value should be considered an estimate.
- The letter **E** in the Qualifier or Flag column indicates an analytical result exceeding 100% of the highest calibration point. The associated value should be considered as an estimate.
- Sample results are presented ‘as measured’ for single injection methodologies, or an average value if multiple injections are made. If all injections are below the MDL, the sample is considered non-detect and the ND value is presented. If one, but not all, are below the MDL, the MDL value is used for any injections that are below the MDL. For example, if the MDL is 0.500 and LOQ is 1.00, and the instrument measures 0.355, 0.620, and 0.442 - the result reported is the average of 0.500, 0.620, and 0.500 - - - i.e. 0.540 with a J flag.
- When a spike recovery (Bag Spike, Collocated Spike Train, or liquid matrix spike) is being calculated, the native (unspiked) sample result is used in the calculations, as long as the value is above the MDL. If a sample is ND, then 0 is used as the native amount (not the MDL value).
- The acronym **DF** represents Dilution Factor. This number represents dilution of the sample during the preparation and/or analysis process. The analytical result taken from a laboratory instrument is multiplied by the DF to determine the final undiluted sample results.
- The addition of **MS** to the Sample ID represents a Matrix Spike. An aliquot of an actual sample is spiked with a known amount of analyte so that a percent recovery value can be determined. The MS analysis indicates what effect the sample matrix may have on the target analyte, i.e. whether or not anything in the sample matrix interferes with the analysis of the analyte(s).





## General Reporting Notes

(continued)

- The addition of **MSD** to the Sample ID represents a Matrix Spike Duplicate. Prepared in the same manner as a MS, the use of duplicate matrix spikes allows further confirmation of laboratory quality by showing the consistency of results gained by performing the same steps multiple times.
- The addition of **LD** to the Sample ID represents a Laboratory Duplicate. The analyst prepares an additional aliquot of sample for testing and the results of the duplicate analysis are compared to the initial result. The result should have a difference value of within 10% of the initial result (if the results of the original analysis are greater than the LOQ).
- The addition of **AD** to the Sample ID represents an Alternate Dilution. The analyst prepares an additional aliquot at a different dilution factor (usually double the initial factor). This analysis helps confirm that no additional compound is present and coeluting or sharing absorbance with the analyte of interest, as they would have a different response/absorbance than the analyte of interest.
- The Sample ID **LCS** represents a Laboratory Control Sample. Clean matrix, similar to the client sample matrix, prepared and analyzed by the laboratory using the same reagents, spiking standards and procedures used for the client samples. The LCS is used to assess the control of the laboratory's analytical system. Whenever spikes are prepared for our client projects, two spikes are retained as LCSs. The LCSs are labeled with the associated project number and kept in-house at the appropriate temperature conditions. When the project samples are received for analysis, the LCSs are analyzed to confirm that the analyte could be recovered from the media, separate from the samples which were used on the project and which may have been affected by source matrix, sample collection, and/or sample transport.
- **Significant Figures:** Where the reported value is much greater than unity (1.00) in the units expressed, the number is rounded to a whole number of units, rather than to 3 significant figures. For example, a value of 10,456.45 ug catch is rounded to 10,456 ug. There are five significant digits displayed, but no confidence should be placed on more than two significant digits. In the case of small numbers, generally 3 significant figures are presented, but still only 2 should be used with confidence. Many neat materials are only certified to 3 digits, and as the mathematically correct final result is always 1 digit less than all its pre-cursors - 2 significant figures are what are most defensible.
- **Manual Integration:** The data systems used for processing will flag manually integrated peaks with an "M". There are several reasons a peak may be manually integrated. These reasons will be identified by the following two letter designations on sample chromatograms, if provided in the report. The peak was *not integrated* by the software "**NI**", the peak was *integrated incorrectly* by the software "**II**" or the *wrong peak* was integrated by the software "**WP**". These codes will accompany the analyst's manual integration stamp placed next to the compound name on the chromatogram.



# Sample Custody





# Raw Data

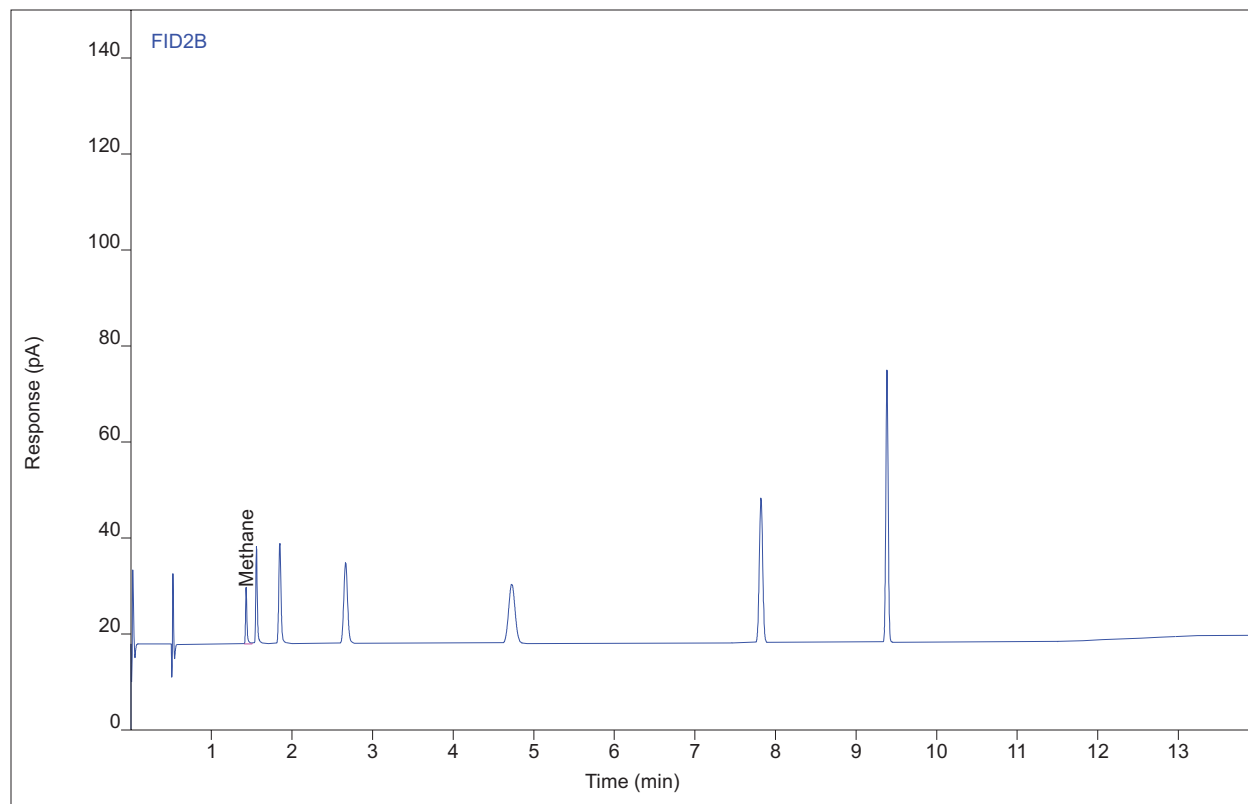


# Chromatogram Report

Sample Name ROSIEP115 #C4 ENV(1=424,4=400)  
Sequence Name ROSIEP138 ver.1  
Inj Data File 026B2102.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/21/2019 10:29 AM  
File Modified 1/21/2019 11:42 AM  
Instrument  
Operator disconnected

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 26  
Injection Volume NA  
Injection 2 of 4  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 12/13/2018 1:28 PM  
Printed 1/28/2019 8:24 AM



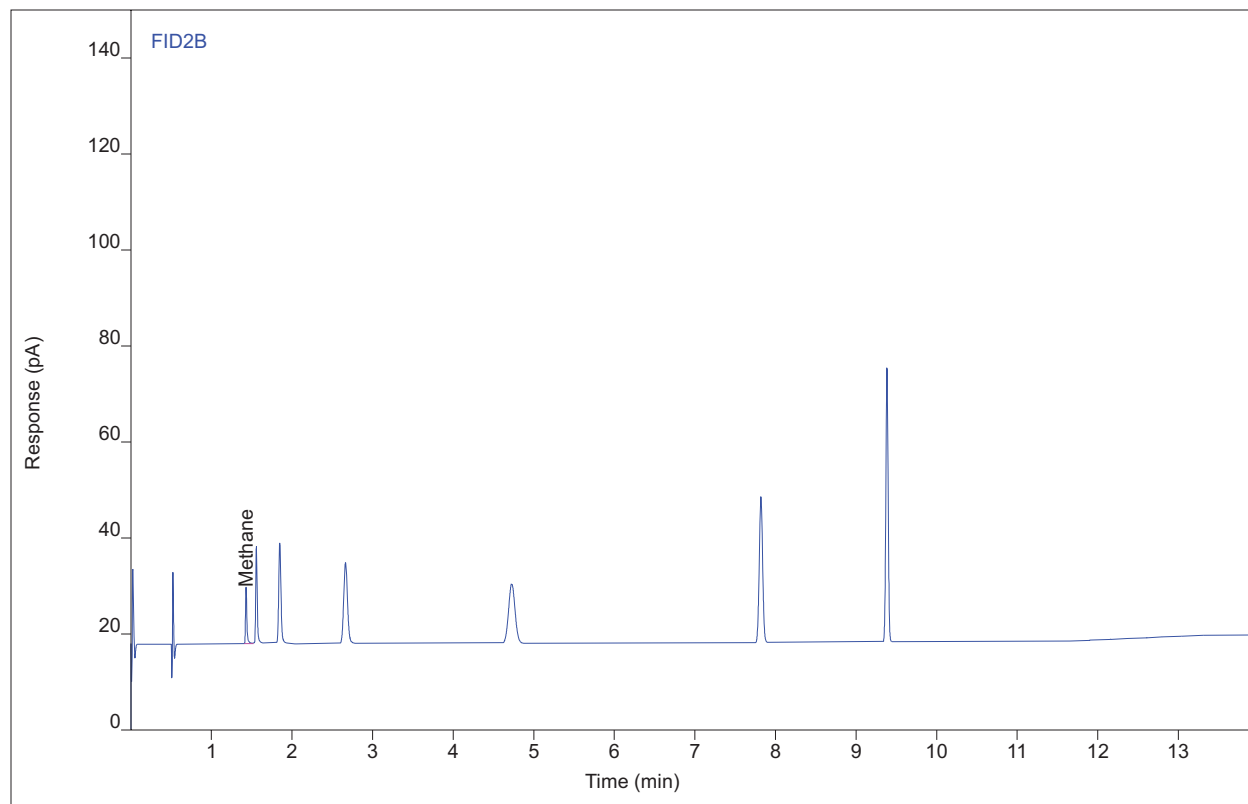
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.43 | 14.4138 | 11.7034 | 40.7348 | 1  | 40.7348 | ppm  |

# Chromatogram Report

Sample Name ROSIEP115 #C4 ENV(1=424,4=400)  
Sequence Name ROSIEP138 ver.1  
Inj Data File 026B2103.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/21/2019 10:54 AM  
File Modified 1/21/2019 11:42 AM  
Instrument  
Operator disconnected

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 26  
Injection Volume NA  
Injection 3 of 4  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 12/13/2018 1:28 PM  
Printed 1/28/2019 8:24 AM



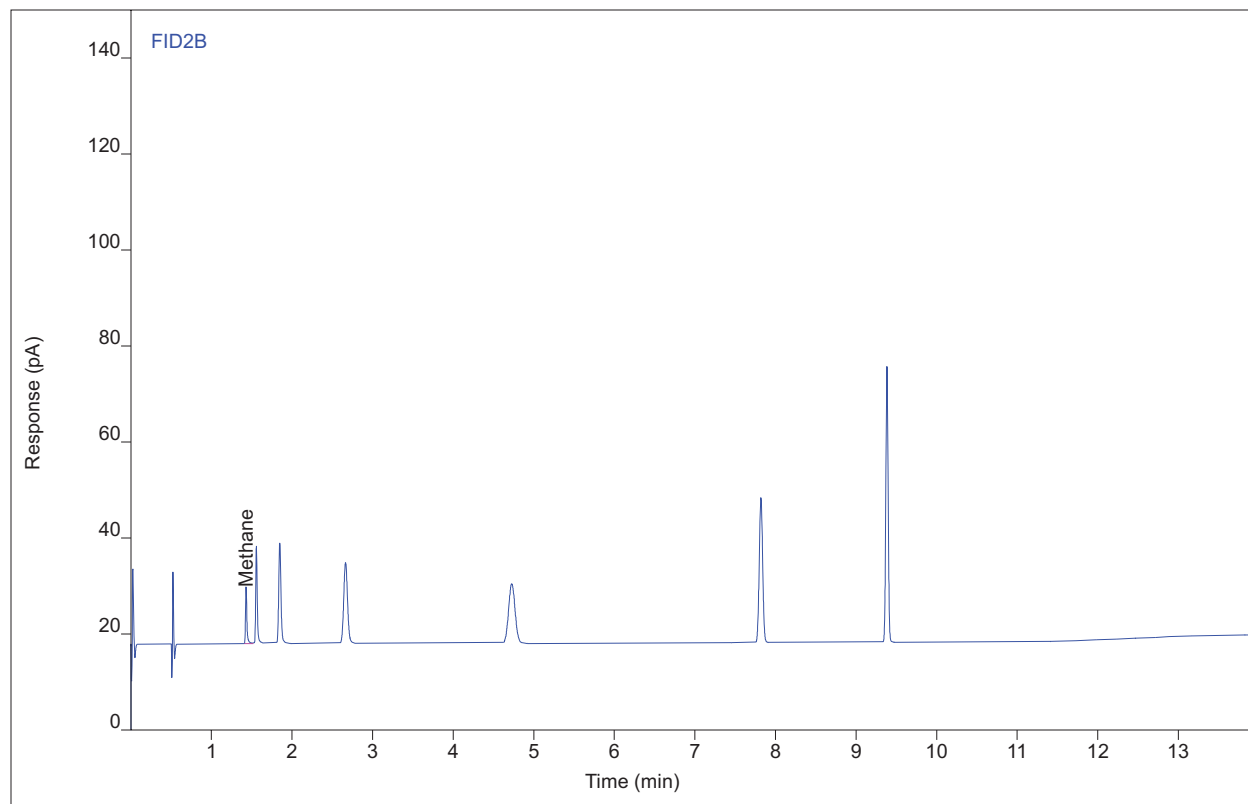
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.43 | 14.2796 | 11.6805 | 40.3554 | 1  | 40.3554 | ppm  |

# Chromatogram Report

# Enthalpy Analytical

Sample Name ROSIEP115 #C4 ENV(1=424,4=400)  
Sequence Name ROSIEP138 ver.1  
Inj Data File 026B2104.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/21/2019 11:19 AM  
File Modified 1/21/2019 11:42 AM  
Instrument  
Operator disconnected

Sample Type  
Vial Number Vial 26  
Injection Volume NA  
Injection 4 of 4  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 12/13/2018 1:28 PM  
Printed 1/28/2019 8:24 AM



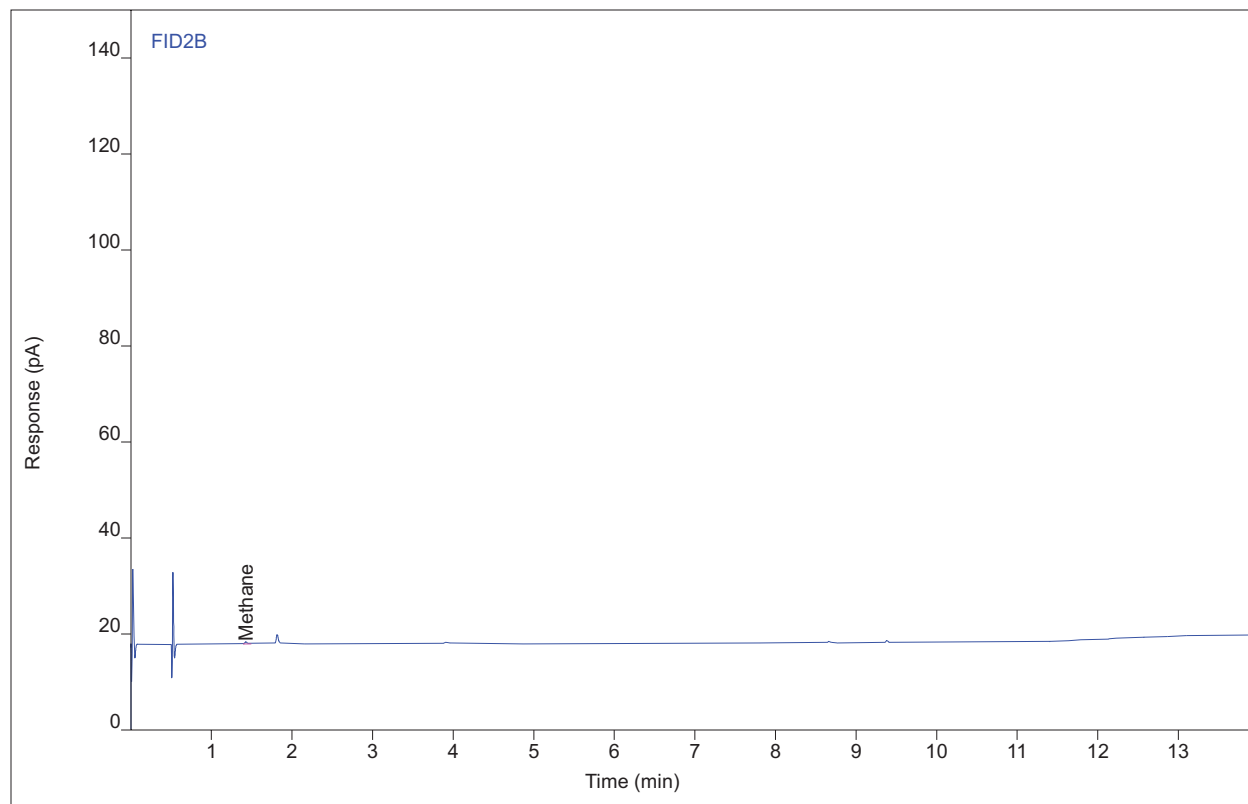
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.43 | 14.2736 | 11.7475 | 40.3384 | 1  | 40.3384 | ppm  |

# Chromatogram Report

Sample Name 0119-087.Run 5.Bag  
Sequence Name ROSIEP141 ver.2  
Inj Data File 019B0101.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/21/2019 11:56 AM  
File Modified 1/22/2019 9:35 AM  
Instrument  
Operator disconnected

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 19  
Injection Volume NA  
Injection 1 of 3  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:24 AM



| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | MM   | 1.43 | 1.10009 | 0.61085 | 3.10133 | 1  | 3.10133 | ppm  |

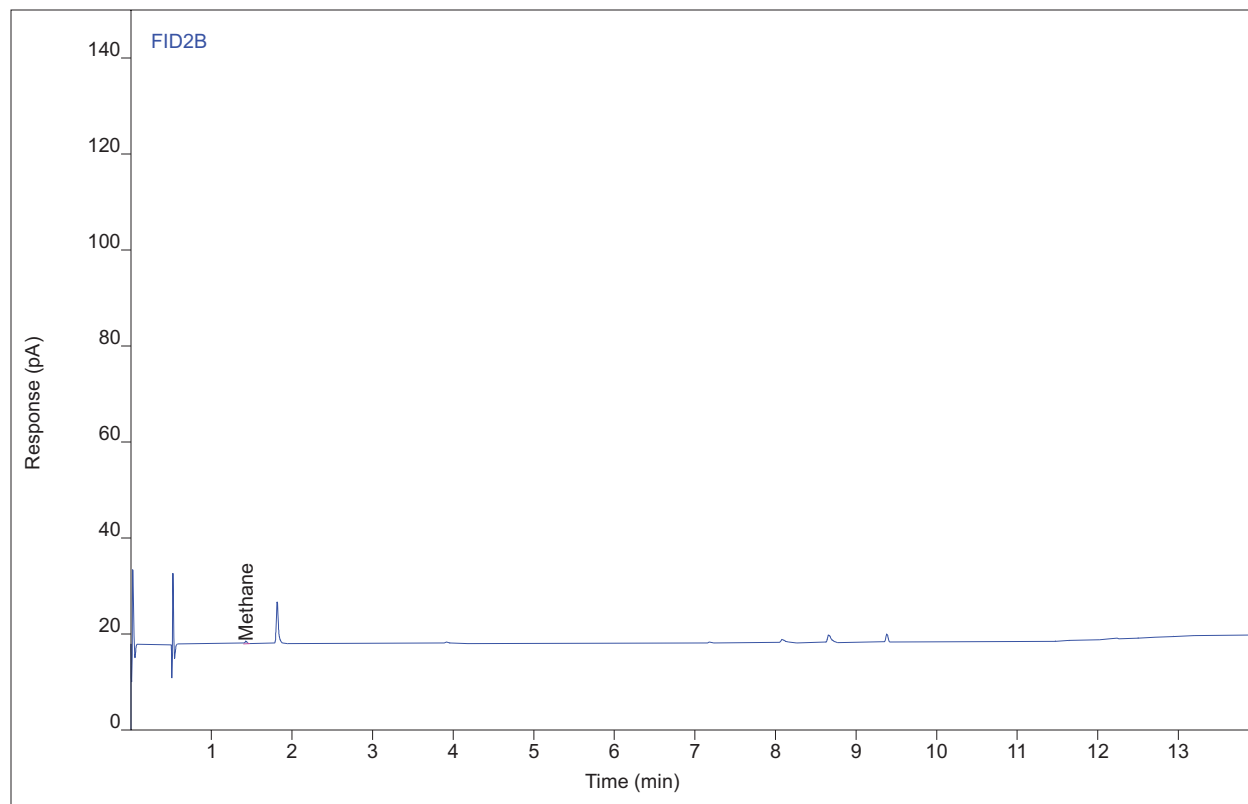


# Chromatogram Report

Sample Name 0119-087.Run 5.Bag  
Sequence Name ROSIEP141 ver.2  
Inj Data File 019B0102.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/21/2019 12:18 PM  
File Modified 1/22/2019 9:35 AM  
Instrument  
Operator disconnected

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 19  
Injection Volume NA  
Injection 2 of 3  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:24 AM



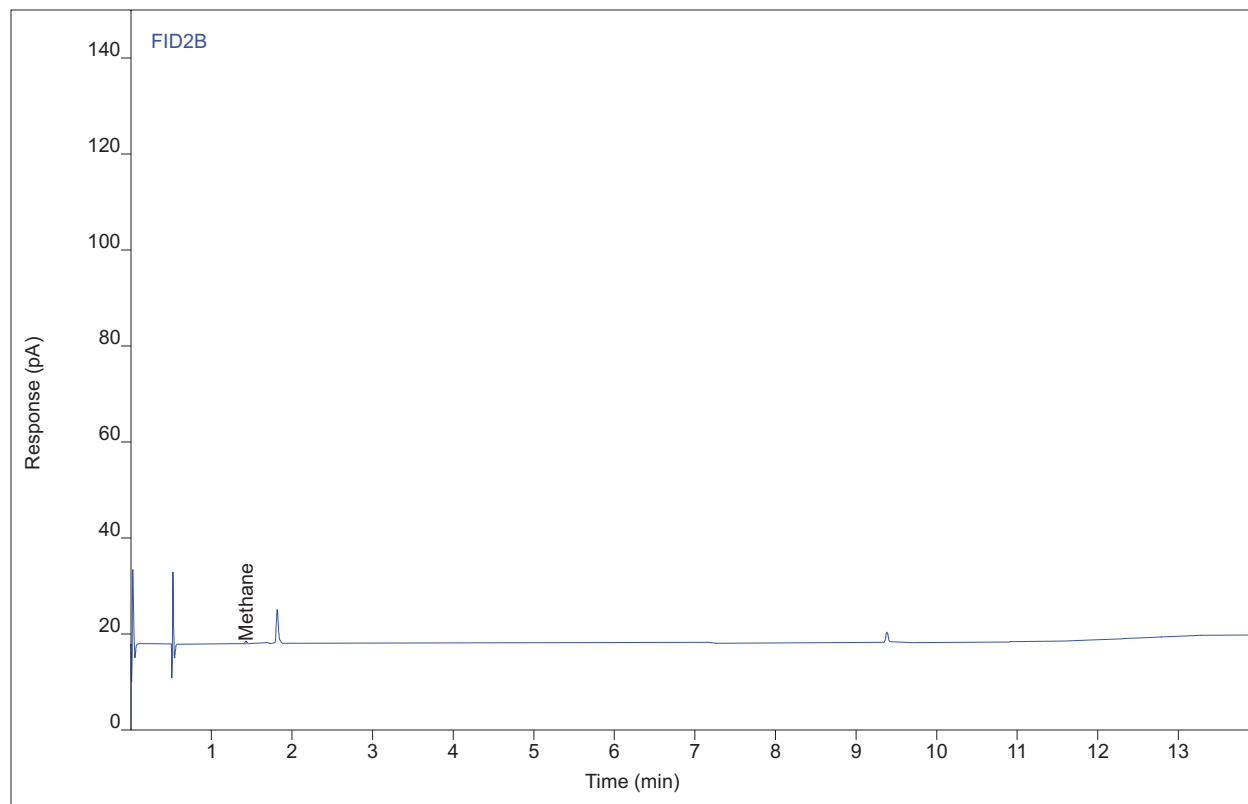
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | MM   | 1.43 | 1.05911 | 0.64719 | 2.98581 | 1  | 2.98581 | ppm  |

# Chromatogram Report

Sample Name 0119-087.Run 5.Bag  
Sequence Name ROSIEP141 ver.2  
Inj Data File 019B0103.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/21/2019 12:39 PM  
File Modified 1/22/2019 9:35 AM  
Instrument  
Operator disconnected

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 19  
Injection Volume NA  
Injection 3 of 3  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:24 AM



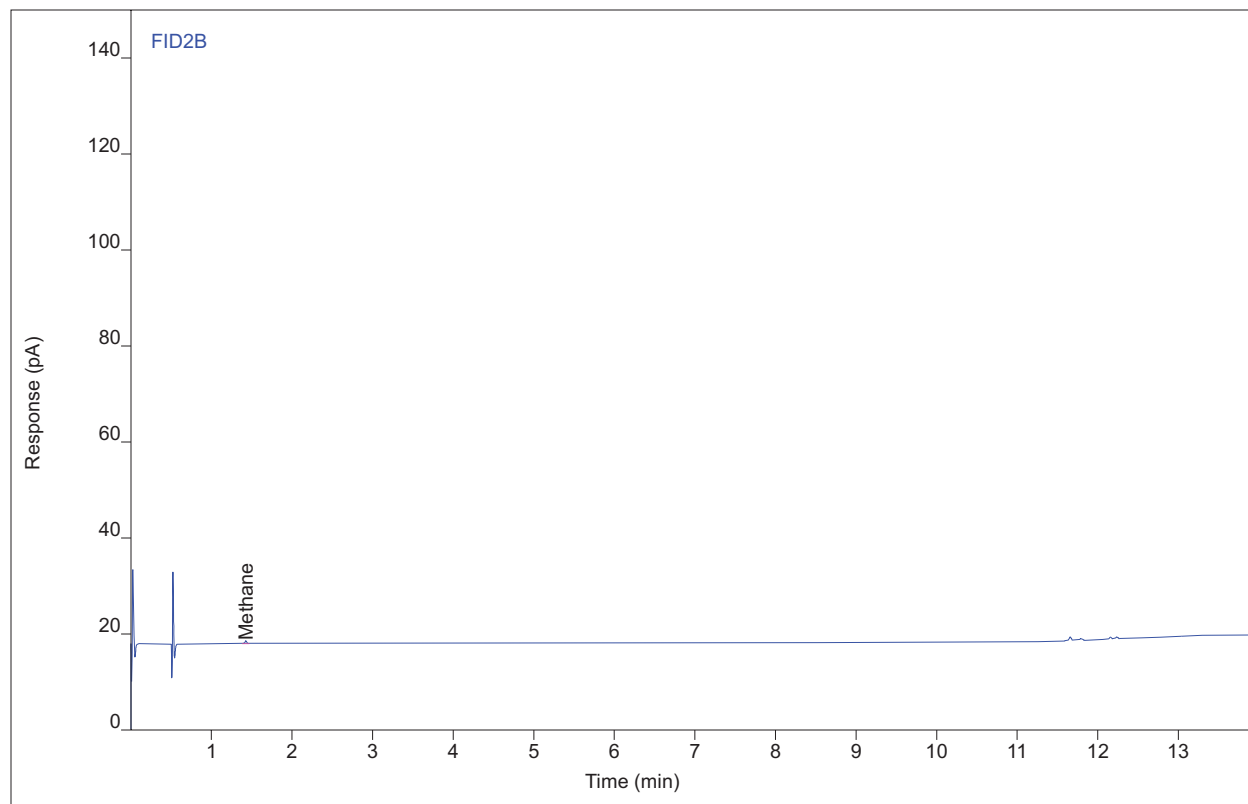
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | MM   | 1.43 | 1.02139 | 0.62931 | 2.87946 | 1  | 2.87946 | ppm  |

# Chromatogram Report

Sample Name 0119-087.Run 1.Bag  
Sequence Name ROSIEP141 ver.2  
Inj Data File 020B0201.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/21/2019 1:01 PM  
File Modified 1/22/2019 9:35 AM  
Instrument  
Operator disconnected

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 20  
Injection Volume NA  
Injection 1 of 3  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:24 AM



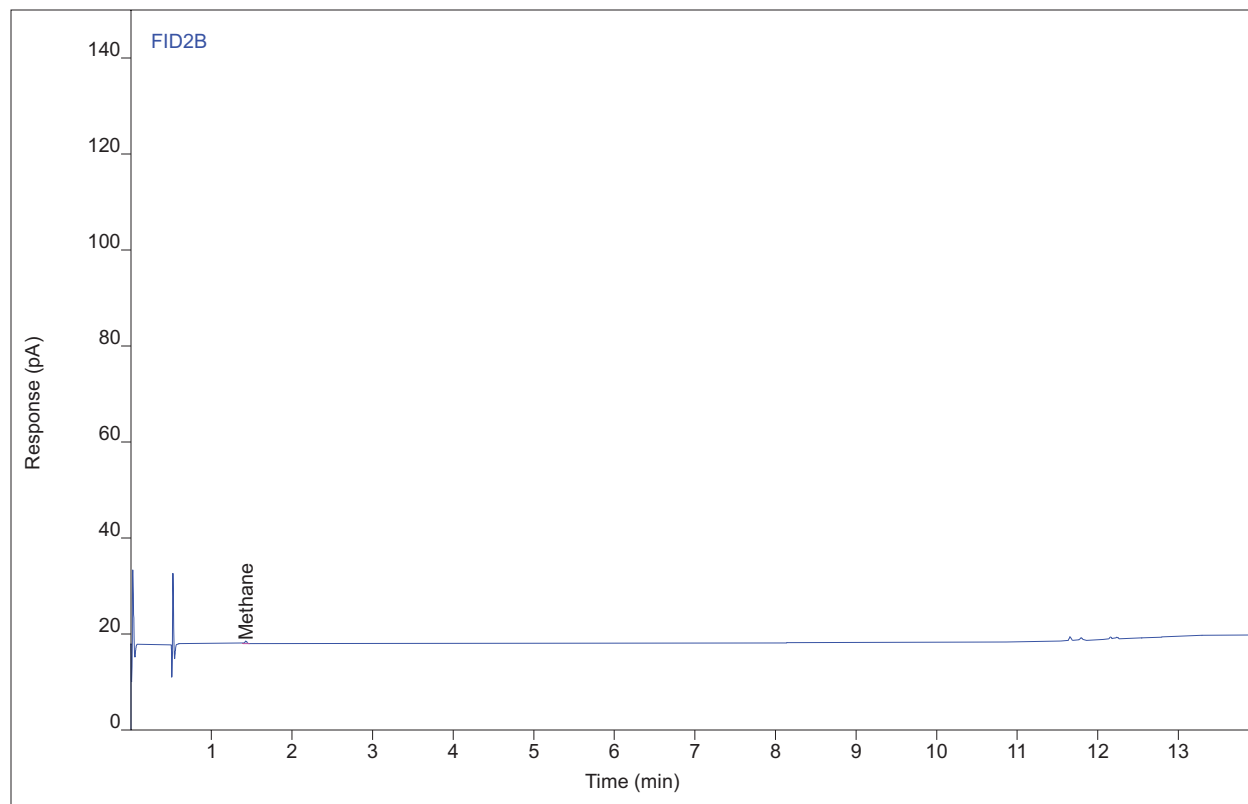
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | MM   | 1.43 | 1.07291 | 0.69014 | 3.02472 | 1  | 3.02472 | ppm  |

# Chromatogram Report

Sample Name 0119-087.Run 1.Bag  
Sequence Name ROSIEP141 ver.2  
Inj Data File 020B0202.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/21/2019 1:23 PM  
File Modified 1/22/2019 9:35 AM  
Instrument  
Operator disconnected

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 20  
Injection Volume NA  
Injection 2 of 3  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:24 AM



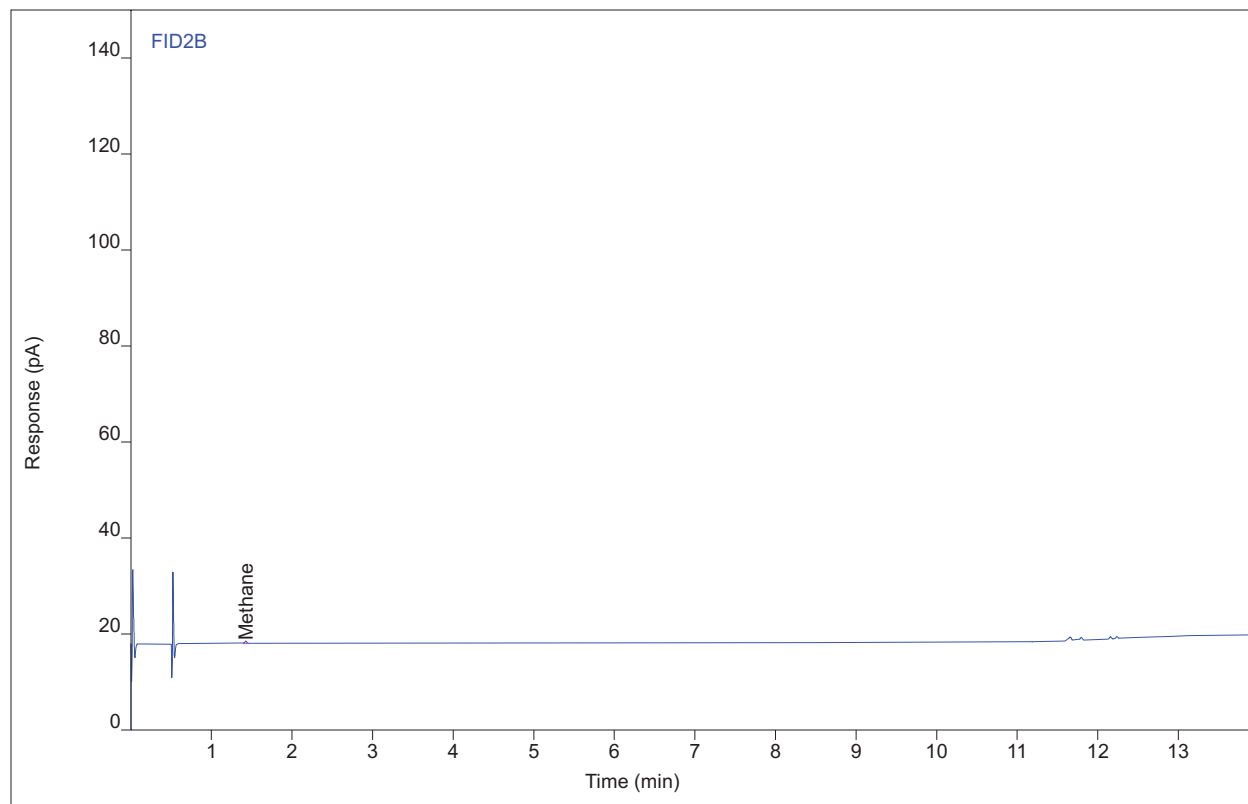
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | MM   | 1.43 | 1.09149 | 0.69355 | 3.07710 | 1  | 3.07710 | ppm  |

# Chromatogram Report

Sample Name 0119-087.Run 1.Bag  
Sequence Name ROSIEP141 ver.2  
Inj Data File 020B0203.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/21/2019 1:44 PM  
File Modified 1/22/2019 9:35 AM  
Instrument  
Operator disconnected

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 20  
Injection Volume NA  
Injection 3 of 3  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:24 AM



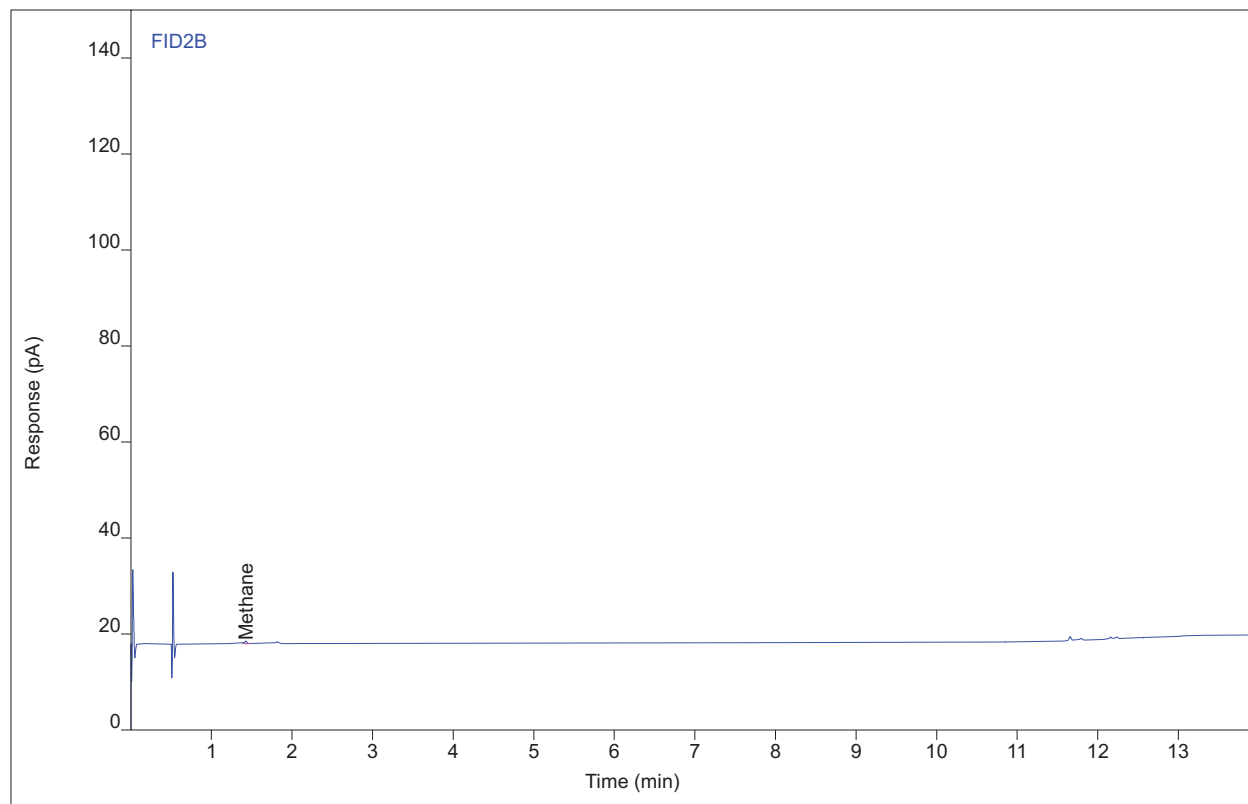
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | MM   | 1.43 | 1.15781 | 0.69517 | 3.26405 | 1  | 3.26405 | ppm  |

# Chromatogram Report

Sample Name 0119-087.Run 2.Bag  
Sequence Name ROSIEP141 ver.2  
Inj Data File 021B0301.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/21/2019 2:06 PM  
File Modified 1/22/2019 9:35 AM  
Instrument  
Operator disconnected

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 21  
Injection Volume NA  
Injection 1 of 3  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:24 AM



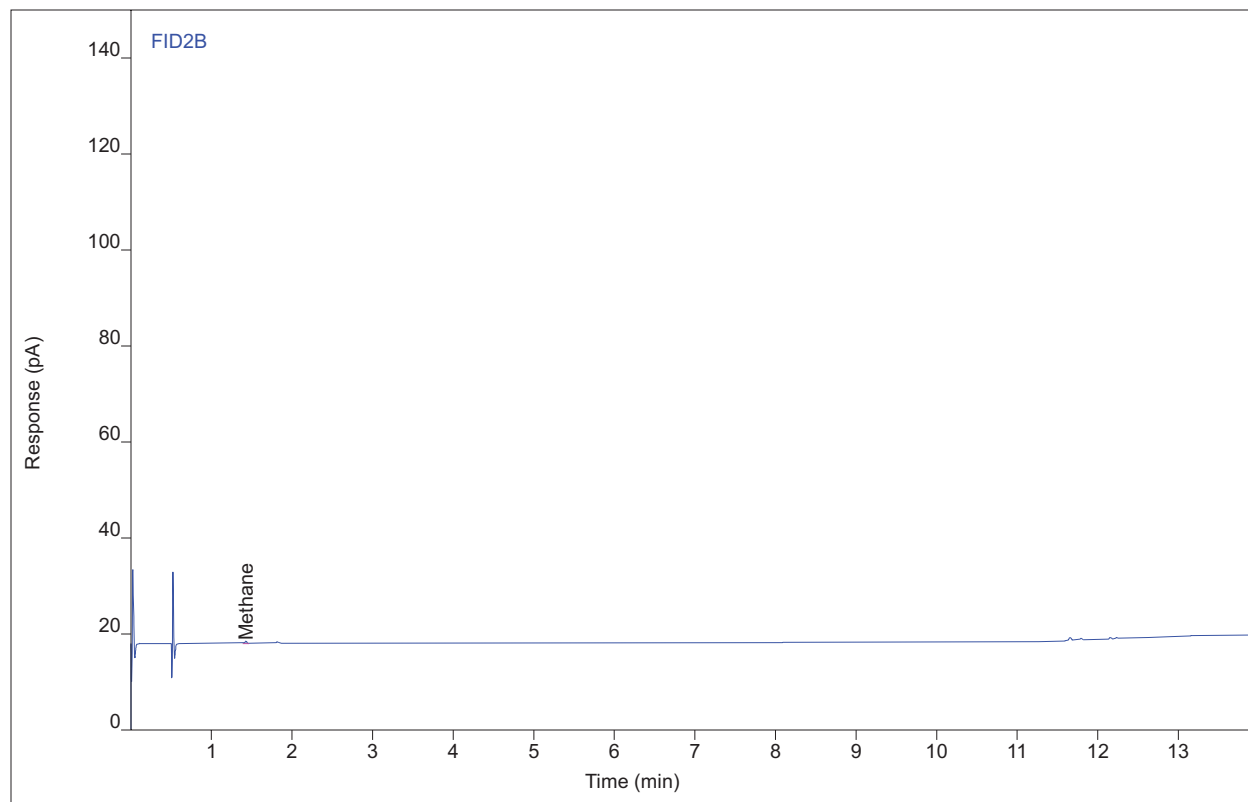
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | MM   | 1.43 | 1.07704 | 0.67330 | 3.03637 | 1  | 3.03637 | ppm  |

# Chromatogram Report

Sample Name 0119-087.Run 2.Bag  
Sequence Name ROSIEP141 ver.2  
Inj Data File 021B0302.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/21/2019 2:28 PM  
File Modified 1/22/2019 9:35 AM  
Instrument  
Operator disconnected

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 21  
Injection Volume NA  
Injection 2 of 3  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:24 AM



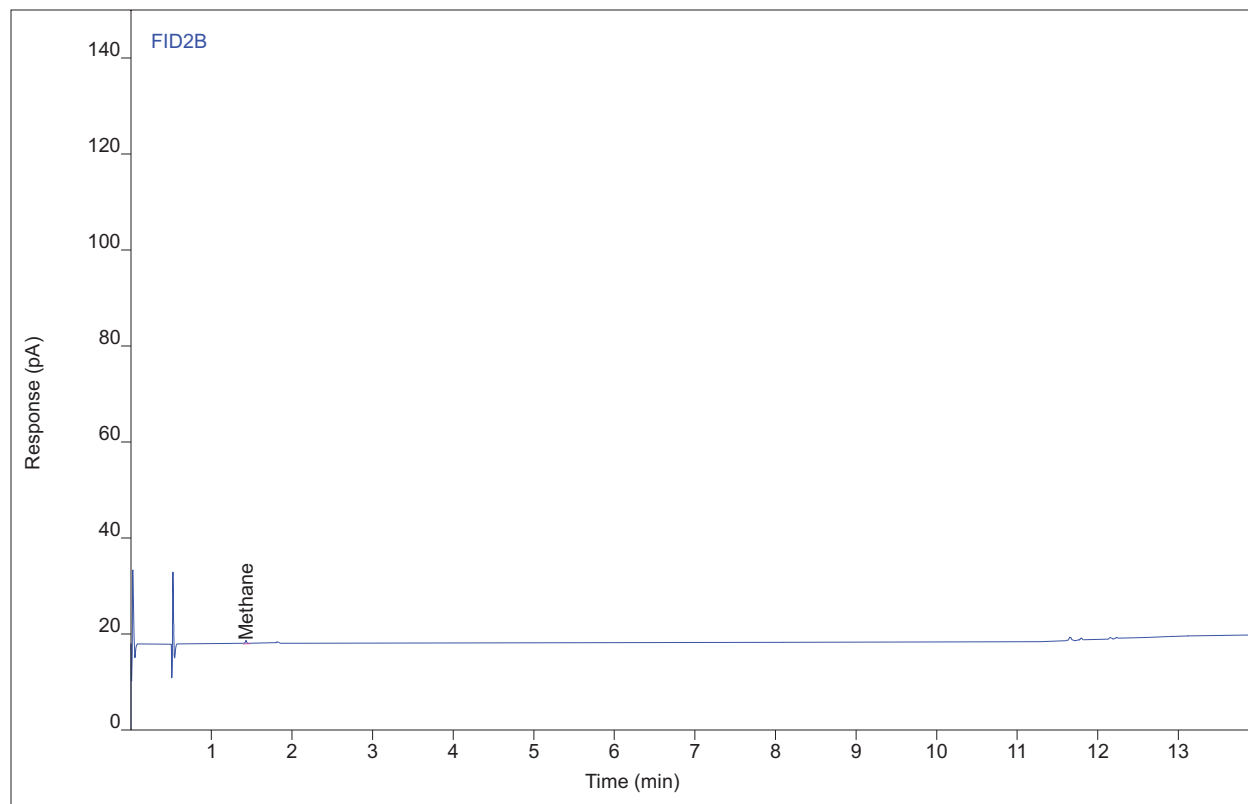
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | MM   | 1.43 | 1.03869 | 0.66506 | 2.92824 | 1  | 2.92824 | ppm  |

# Chromatogram Report

Sample Name 0119-087.Run 2.Bag  
Sequence Name ROSIEP141 ver.2  
Inj Data File 021B0303.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/21/2019 2:49 PM  
File Modified 1/22/2019 9:35 AM  
Instrument  
Operator disconnected

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 21  
Injection Volume NA  
Injection 3 of 3  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:24 AM



| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | MM   | 1.43 | 1.12298 | 0.67683 | 3.16587 | 1  | 3.16587 | ppm  |

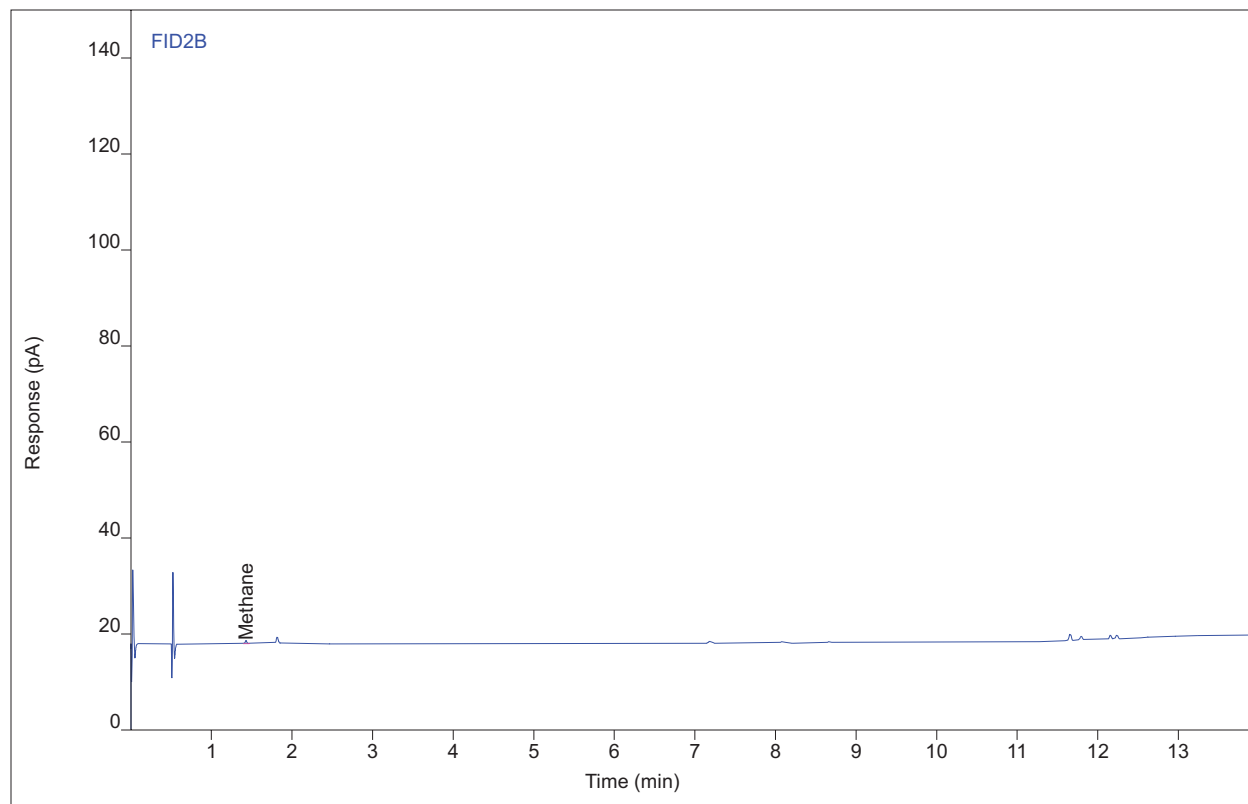


# Chromatogram Report

Sample Name 0119-087.Run 3.Bag  
Sequence Name ROSIEP141A ver.2  
Inj Data File 022B0101.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/21/2019 3:30 PM  
File Modified 1/22/2019 9:38 AM  
Instrument Rosie  
Operator Nicole West

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 22  
Injection Volume NA  
Injection 1 of 3  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:24 AM



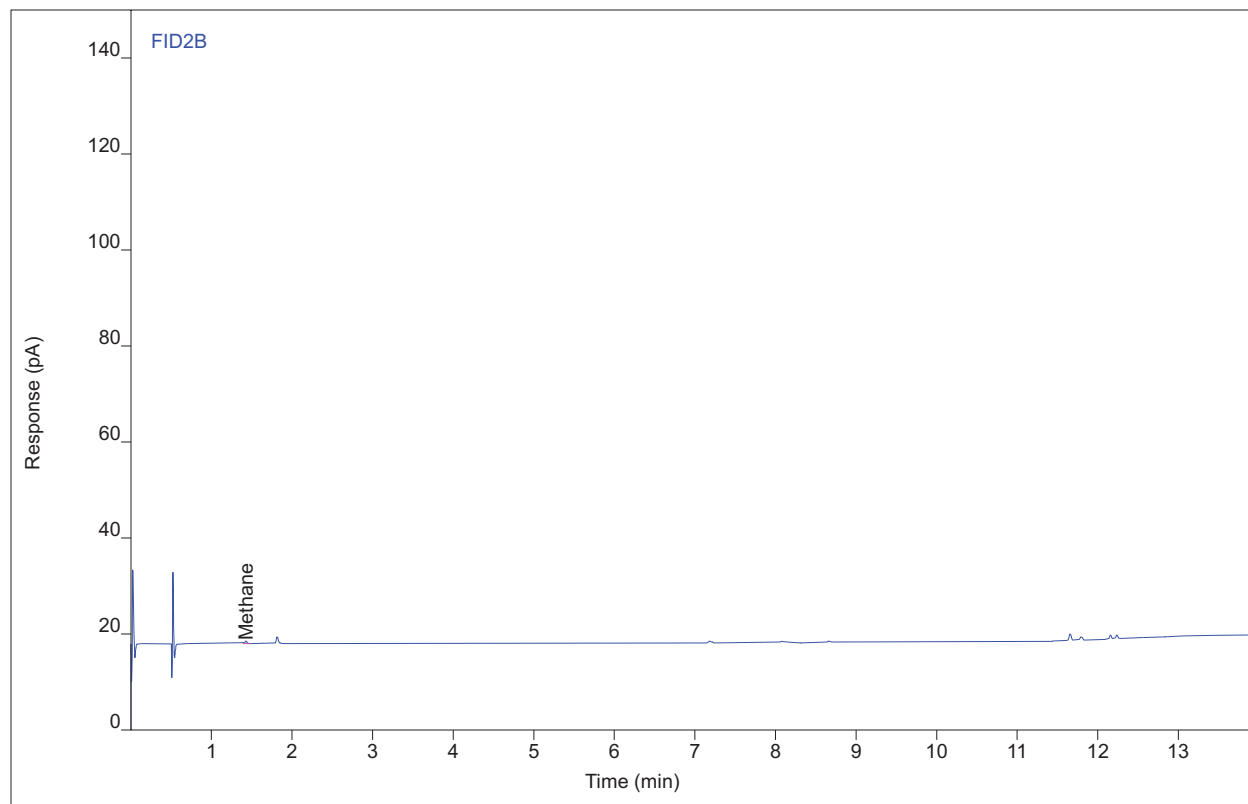
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | MM   | 1.43 | 1.10502 | 0.71978 | 3.11523 | 1  | 3.11523 | ppm  |

# Chromatogram Report

Sample Name 0119-087.Run 3.Bag  
Sequence Name ROSIEP141A ver.2  
Inj Data File 022B0102.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/21/2019 3:51 PM  
File Modified 1/22/2019 9:38 AM  
Instrument Rosie  
Operator Nicole West

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 22  
Injection Volume NA  
Injection 2 of 3  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:24 AM



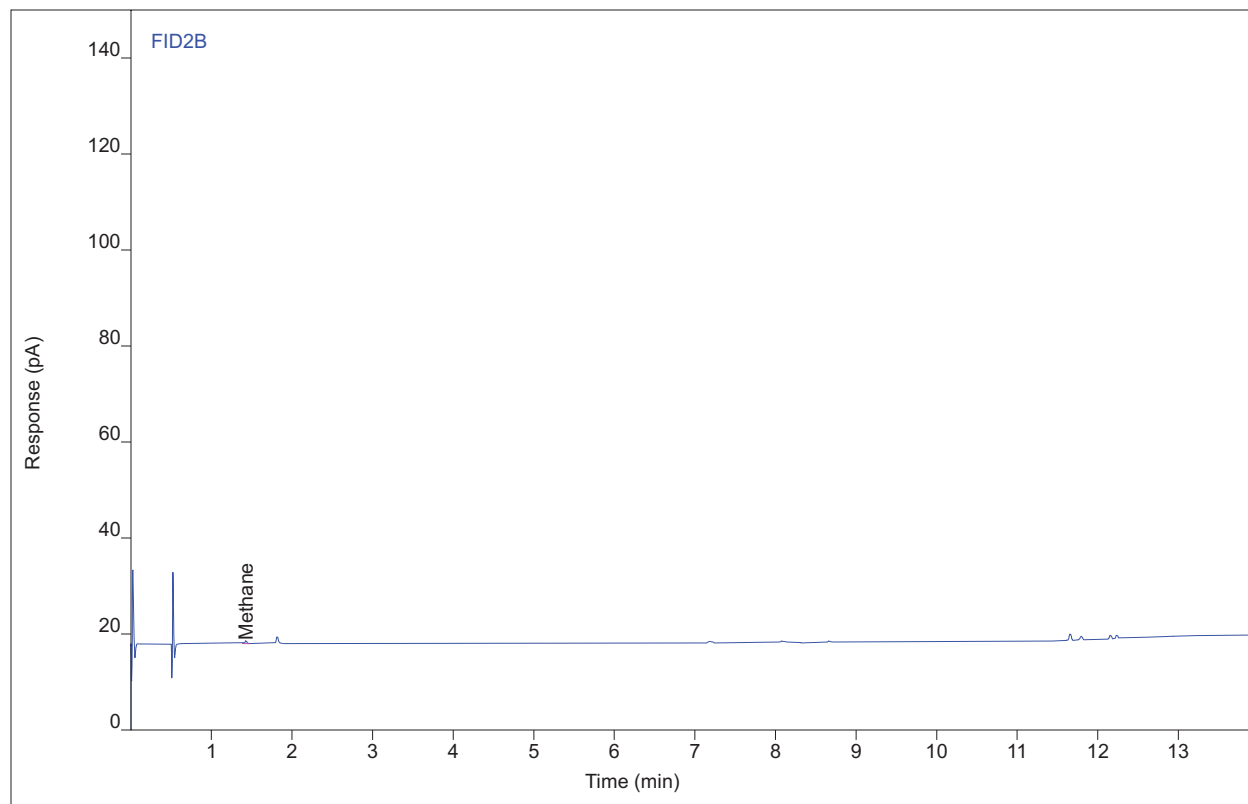
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | MM   | 1.43 | 1.07024 | 0.70528 | 3.01717 | 1  | 3.01717 | ppm  |

# Chromatogram Report

Sample Name 0119-087.Run 3.Bag  
Sequence Name ROSIEP141A ver.2  
Inj Data File 022B0103.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/21/2019 4:13 PM  
File Modified 1/22/2019 9:38 AM  
Instrument Rosie  
Operator Nicole West

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 22  
Injection Volume NA  
Injection 3 of 3  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:24 AM



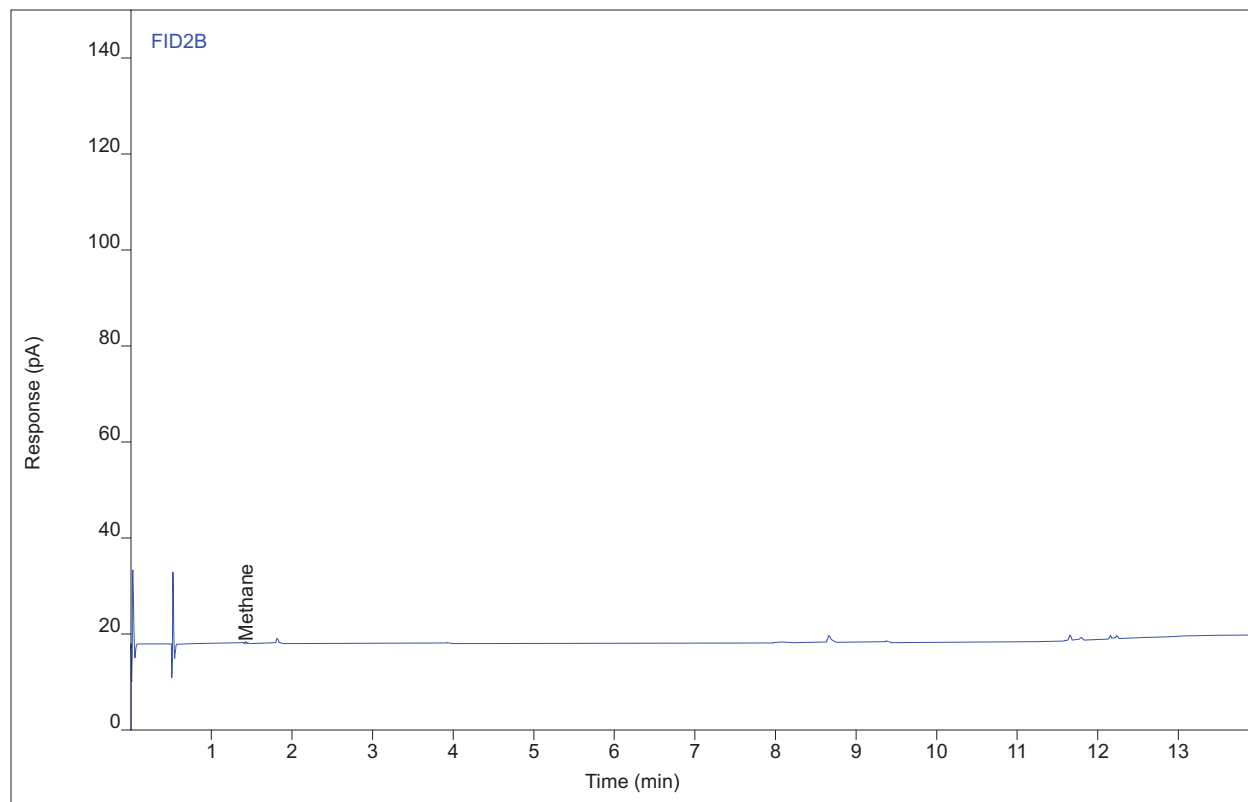
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | MM   | 1.43 | 1.08887 | 0.71310 | 3.06970 | 1  | 3.06970 | ppm  |

# Chromatogram Report

Sample Name 0119-087.Run 4.Bag  
Sequence Name ROSIEP141A ver.2  
Inj Data File 019B0201.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/21/2019 4:35 PM  
File Modified 1/22/2019 9:38 AM  
Instrument Rosie  
Operator Nicole West

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 19  
Injection Volume NA  
Injection 1 of 3  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:24 AM



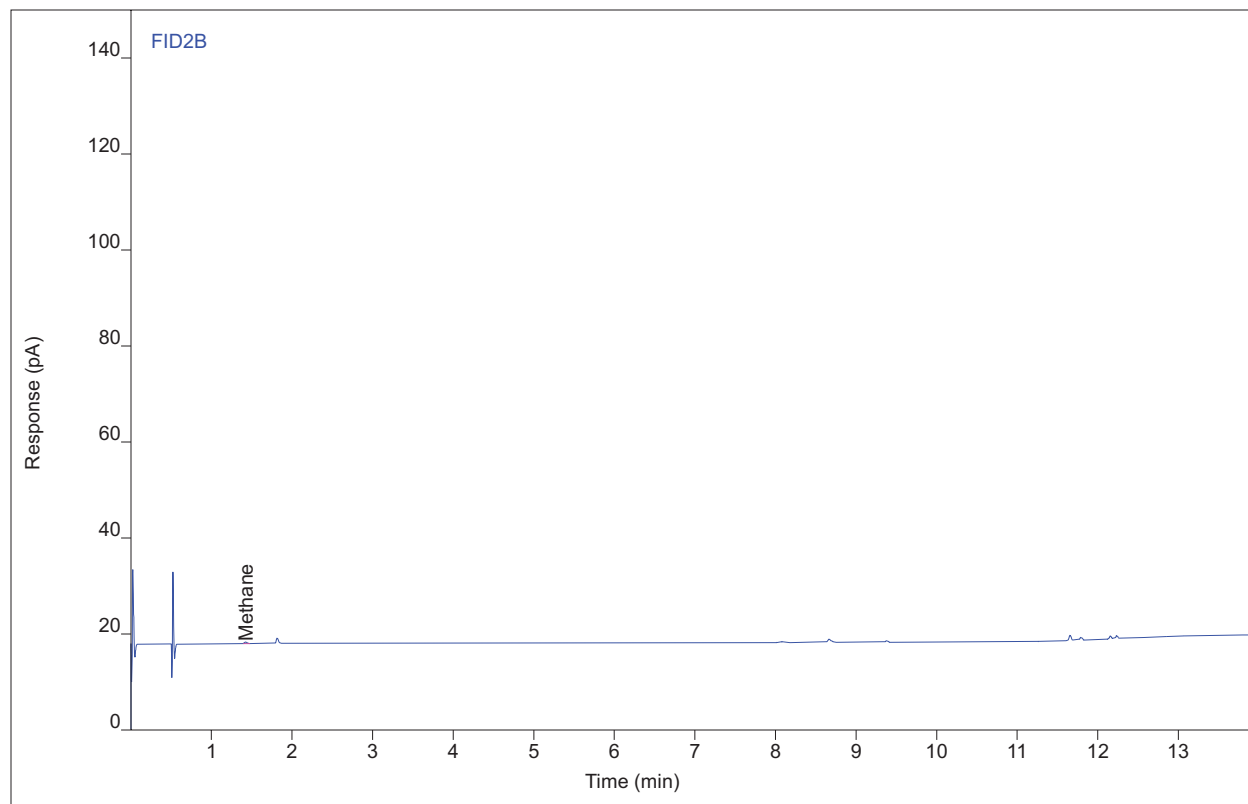
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | MM   | 1.43 | 0.88661 | 0.52665 | 2.49952 | 1  | 2.49952 | ppm  |

# Chromatogram Report

Sample Name 0119-087.Run 4.Bag  
Sequence Name ROSIEP141A ver.2  
Inj Data File 019B0202.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/21/2019 4:56 PM  
File Modified 1/22/2019 9:38 AM  
Instrument Rosie  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 19  
Injection Volume NA  
Injection 2 of 3  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:24 AM



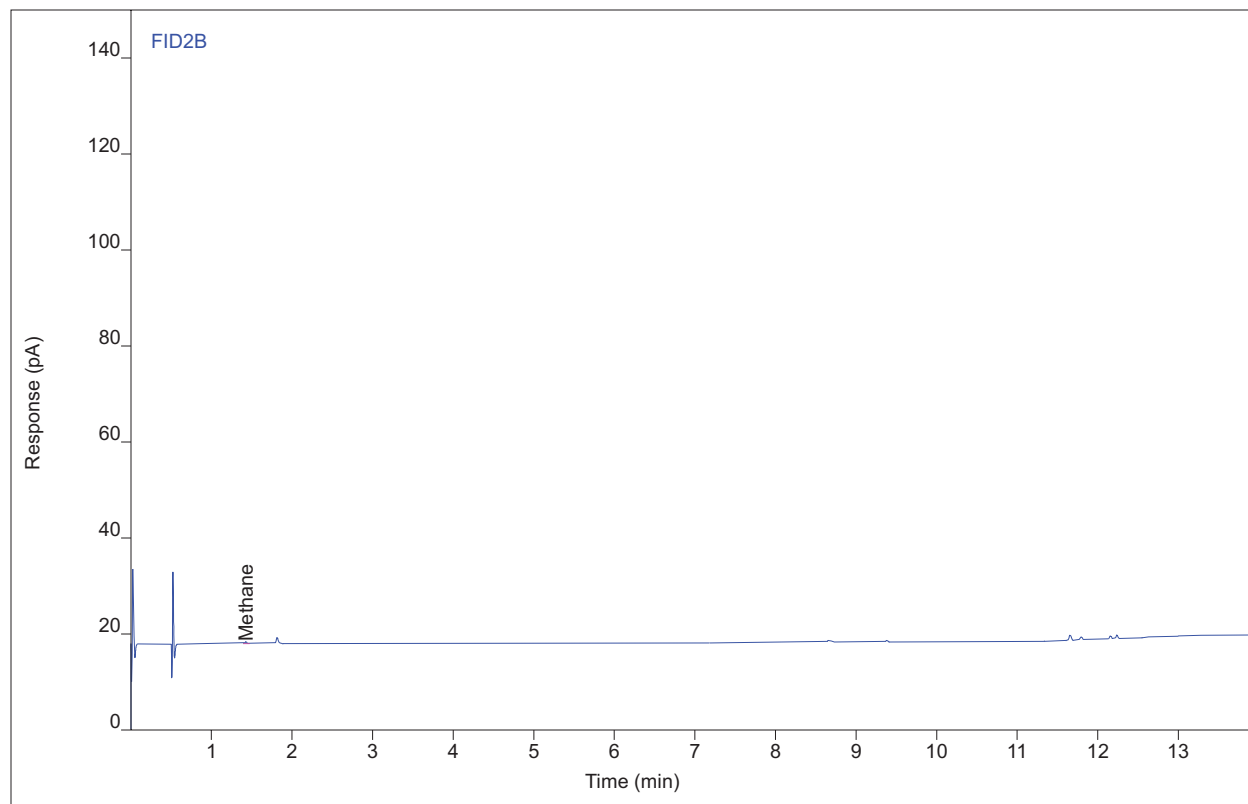
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | MM   | 1.43 | 0.83820 | 0.50906 | 2.36303 | 1  | 2.36303 | ppm  |

# Chromatogram Report

Sample Name 0119-087.Run 4.Bag  
Sequence Name ROSIEP141A ver.2  
Inj Data File 019B0203.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/21/2019 5:18 PM  
File Modified 1/22/2019 9:38 AM  
Instrument Rosie  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 19  
Injection Volume NA  
Injection 3 of 3  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:24 AM



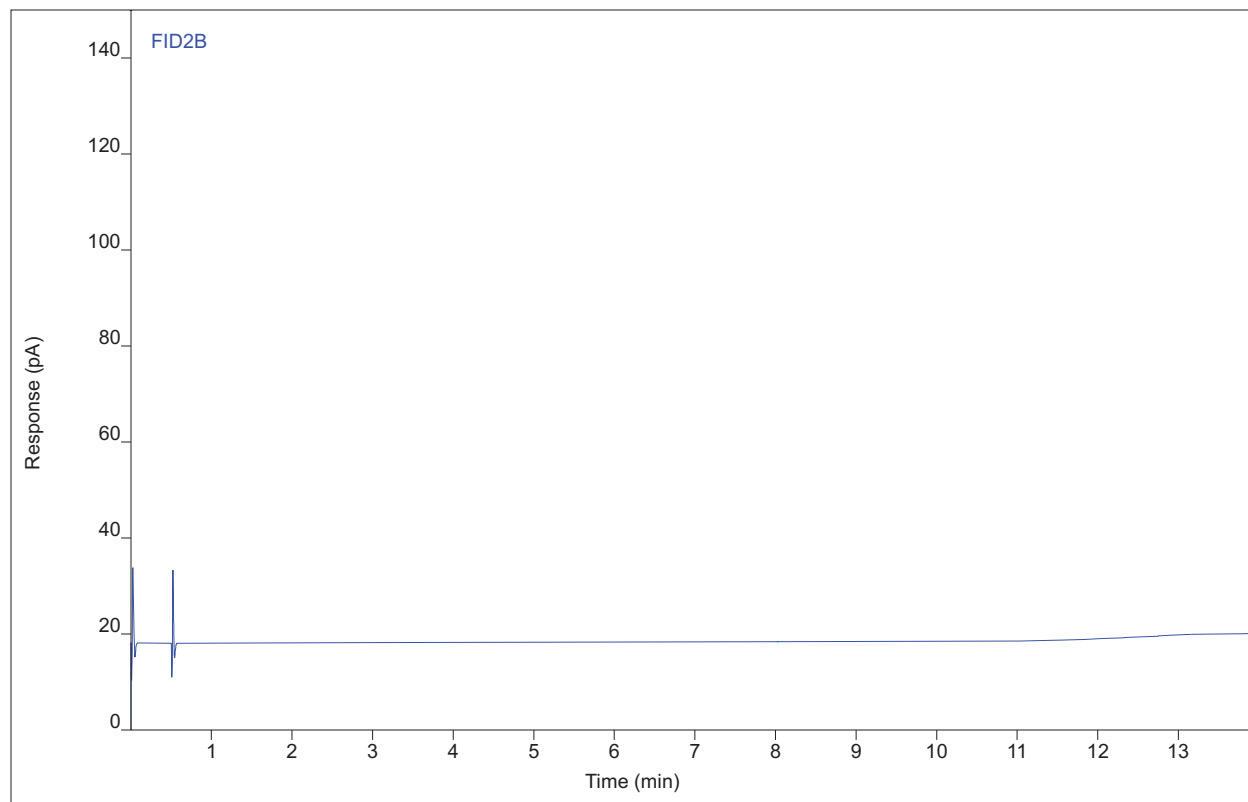
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | MM   | 1.43 | 0.84591 | 0.51933 | 2.38477 | 1  | 2.38477 | ppm  |

# Chromatogram Report

Sample Name He Blank #LB  
Sequence Name ROSIEP141A ver.2  
Inj Data File 017B1101.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/22/2019 3:02 AM  
File Modified 1/22/2019 9:39 AM  
Instrument Rosie  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 17  
Injection Volume NA  
Injection 1 of 3  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:24 AM



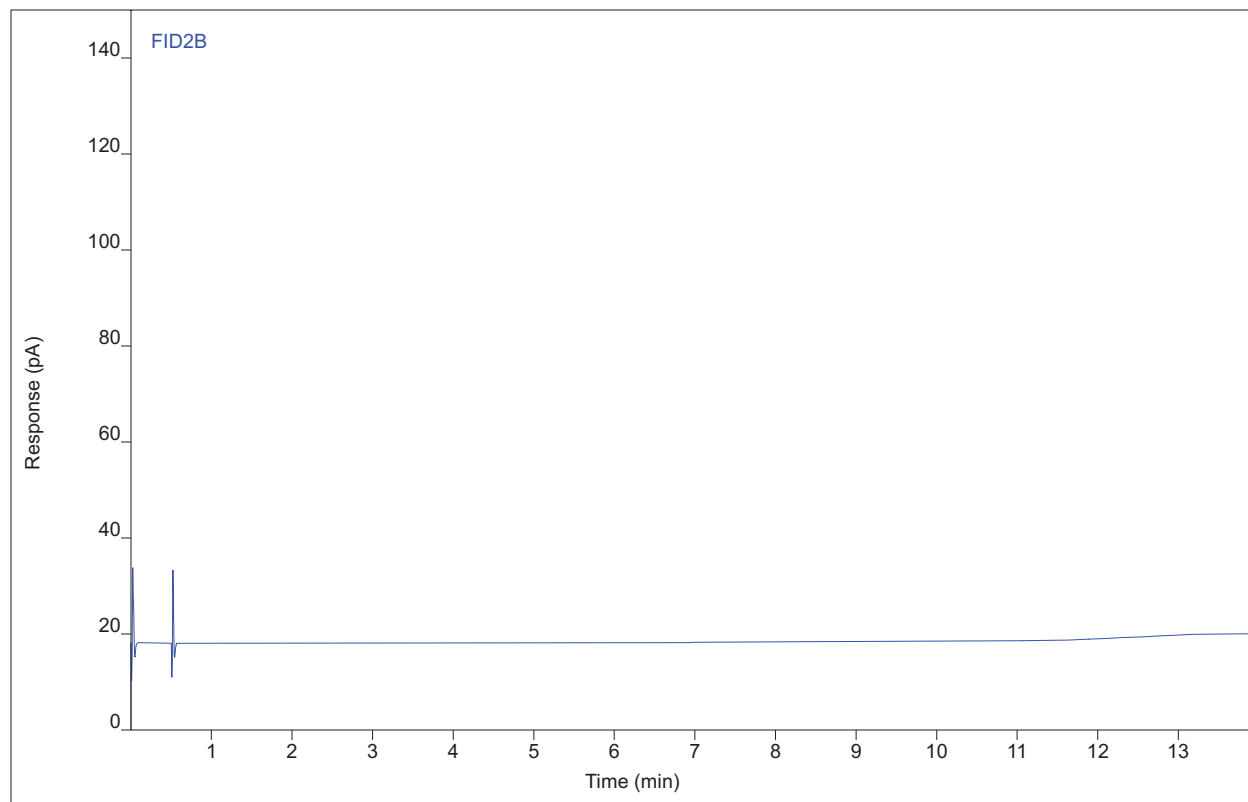
| Compound | Type | RT     | Area | Height | Amount | DF | SampAmt | Unit |
|----------|------|--------|------|--------|--------|----|---------|------|
| Methane  |      | (1.43) |      |        |        | 1  |         |      |

# Chromatogram Report

Sample Name He Blank #LB  
Sequence Name ROSIEP141A ver.2  
Inj Data File 017B1102.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/22/2019 3:23 AM  
File Modified 1/22/2019 9:39 AM  
Instrument Rosie  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 17  
Injection Volume NA  
Injection 2 of 3  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:24 AM



| Compound | Type | RT     | Area | Height | Amount | DF | SampAmt | Unit |
|----------|------|--------|------|--------|--------|----|---------|------|
| Methane  |      | (1.43) |      |        |        | 1  |         |      |

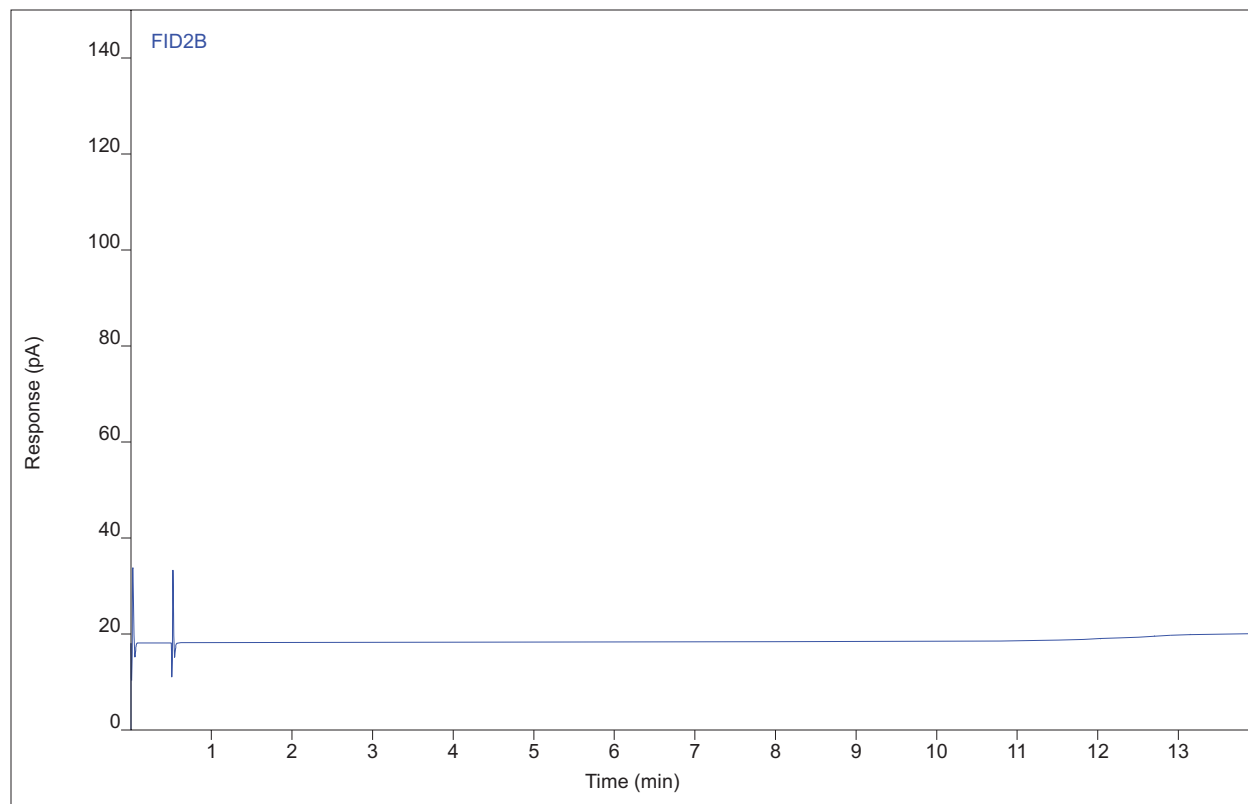


# Chromatogram Report

Sample Name He Blank #LB  
Sequence Name ROSIEP141A ver.2  
Inj Data File 017B1103.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/22/2019 3:45 AM  
File Modified 1/22/2019 9:39 AM  
Instrument Rosie  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 17  
Injection Volume NA  
Injection 3 of 3  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:24 AM



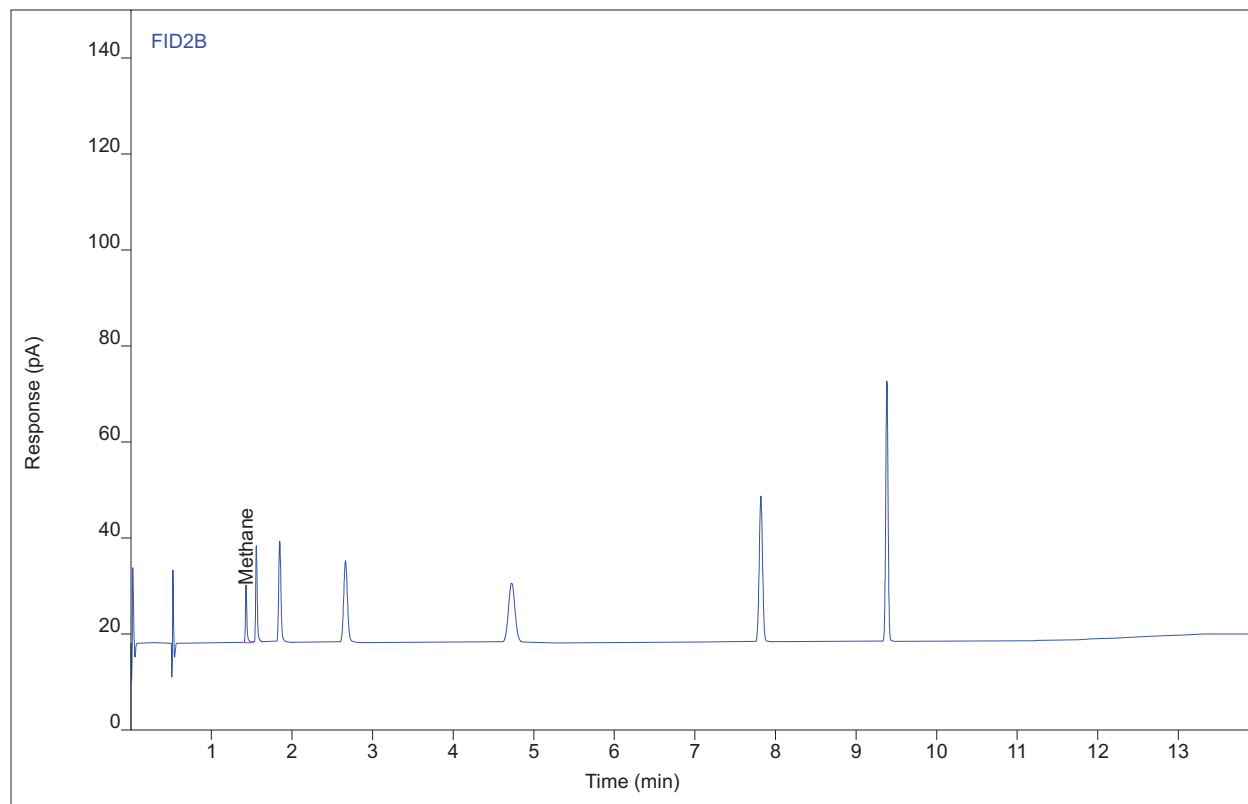
| Compound | Type | RT     | Area | Height | Amount | DF | SampAmt | Unit |
|----------|------|--------|------|--------|--------|----|---------|------|
| Methane  |      | (1.43) |      |        |        | 1  |         |      |

# Chromatogram Report

Sample Name ROSIEP115 #C4 ENV(1=424,4=400)  
Sequence Name ROSIEP141A ver.2  
Inj Data File 026B1202.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/22/2019 4:33 AM  
File Modified 1/22/2019 9:39 AM  
Instrument Rosie  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 26  
Injection Volume NA  
Injection 2 of 4  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:24 AM



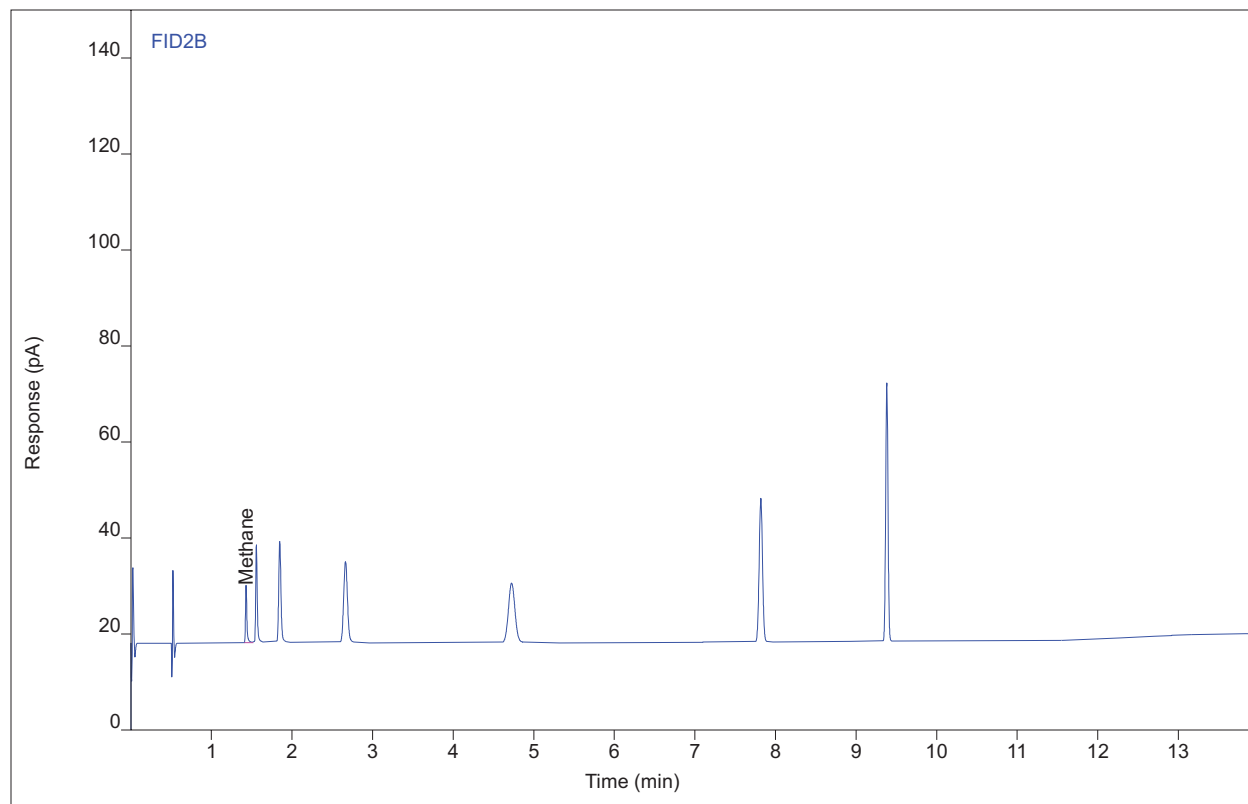
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.43 | 14.5798 | 11.9397 | 41.2041 | 1  | 41.2041 | ppm  |

# Chromatogram Report

# Enthalpy Analytical

Sample Name ROSIEP115 #C4 ENV(1=424,4=400)  
Sequence Name ROSIEP141A ver.2  
Inj Data File 026B1203.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/22/2019 4:58 AM  
File Modified 1/22/2019 9:39 AM  
Instrument Rosie  
Operator Justin Guenzler

Sample Type  
Vial Number Vial 26  
Injection Volume NA  
Injection 3 of 4  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:24 AM



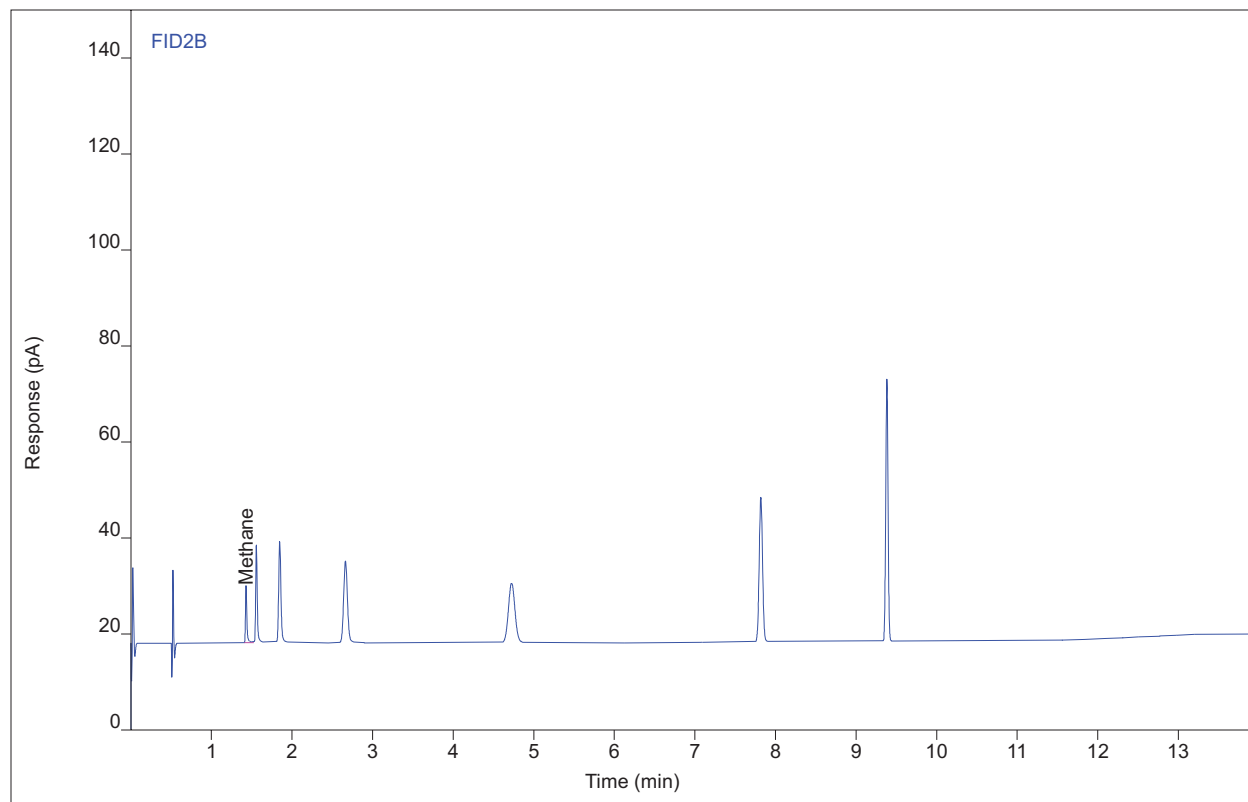
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.43 | 14.5420 | 11.9249 | 41.0971 | 1  | 41.0971 | ppm  |

# Chromatogram Report

Sample Name ROSIEP115 #C4 ENV(1=424,4=400)  
Sequence Name ROSIEP141A ver.2  
Inj Data File 026B1204.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/22/2019 5:22 AM  
File Modified 1/22/2019 9:39 AM  
Instrument Rosie  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 26  
Injection Volume NA  
Injection 4 of 4  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:24 AM



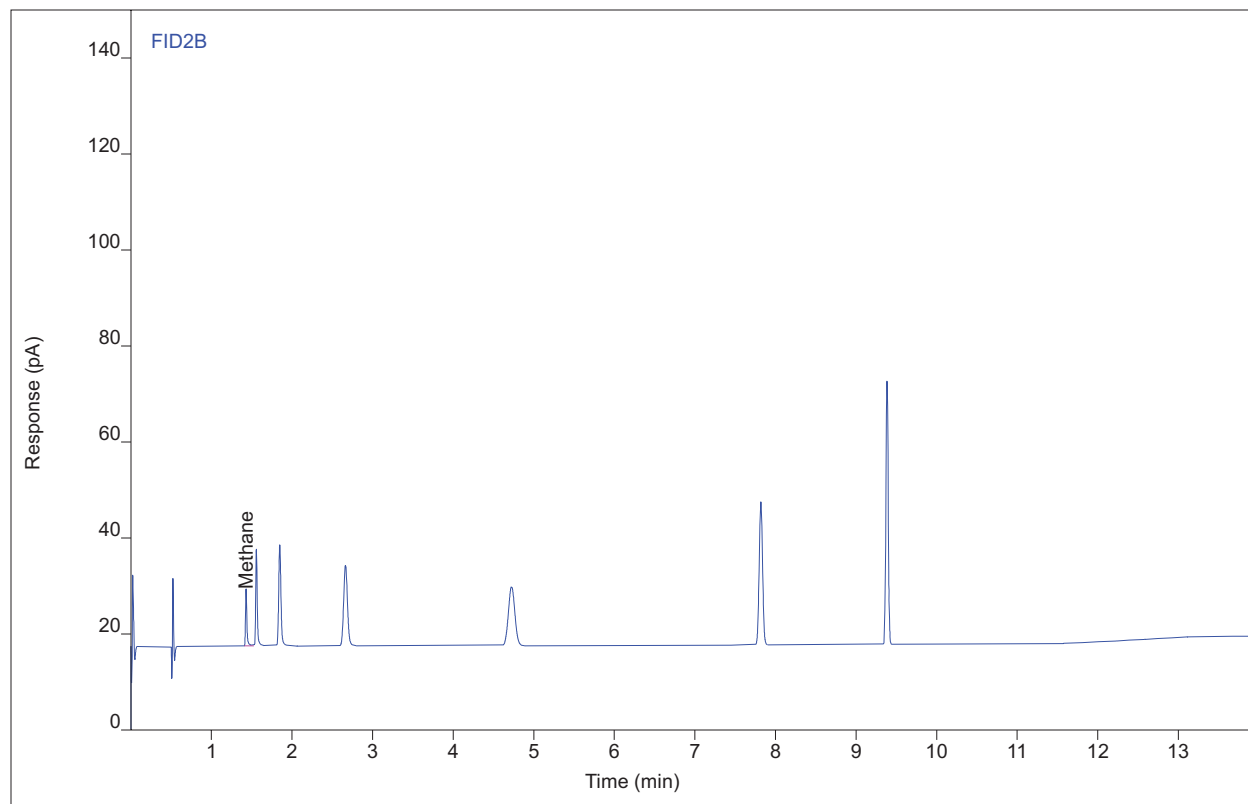
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.43 | 14.6701 | 11.8508 | 41.4594 | 1  | 41.4594 | ppm  |

# Chromatogram Report

Sample Name ROSIEP115 #C4 ENV(1=424,4=400)  
Sequence Name ROSIEP145 ver.1  
Inj Data File 026B0202.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/27/2019 2:32 PM  
File Modified 1/28/2019 8:19 AM  
Instrument Rosie  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 26  
Injection Volume NA  
Injection 2 of 4  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:25 AM



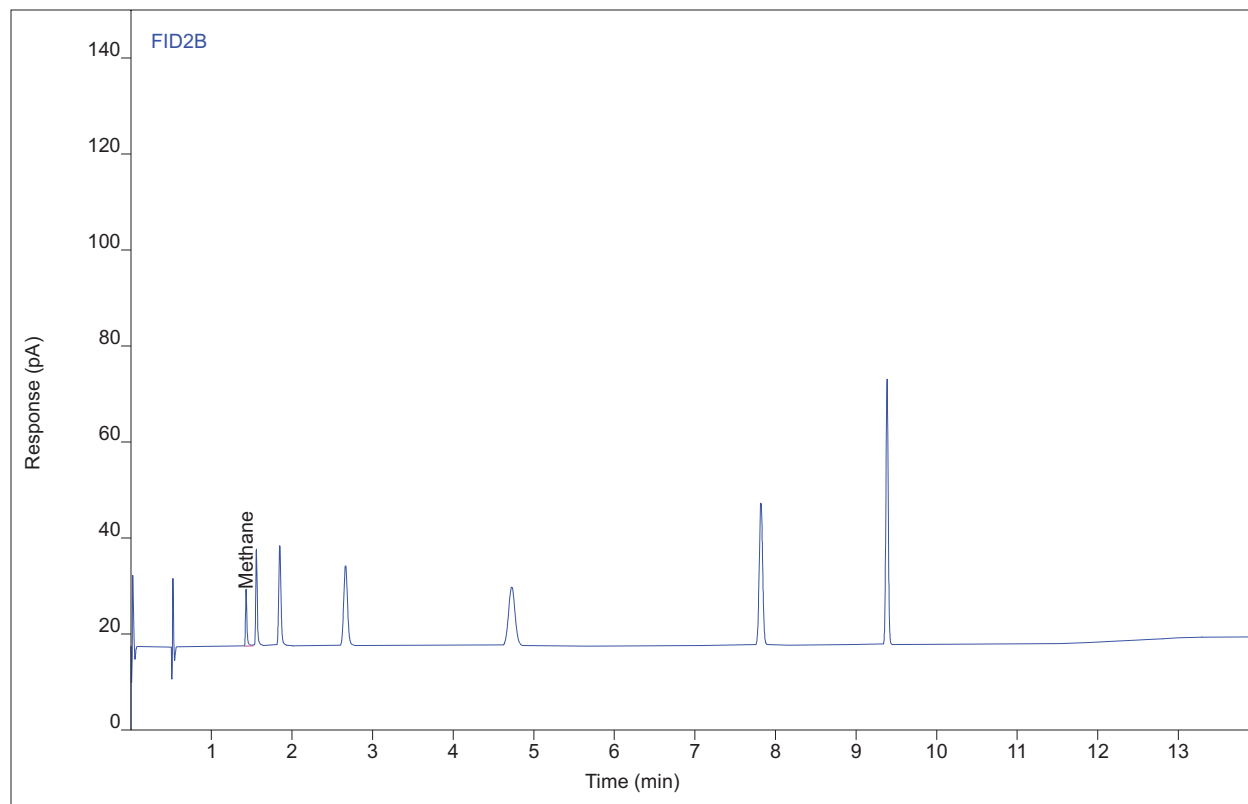
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.43 | 14.4798 | 11.7532 | 40.9214 | 1  | 40.9214 | ppm  |

# Chromatogram Report

Sample Name ROSIEP115 #C4 ENV(1=424,4=400)  
Sequence Name ROSIEP145 ver.1  
Inj Data File 026B0203.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/27/2019 2:57 PM  
File Modified 1/28/2019 8:19 AM  
Instrument Rosie  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 26  
Injection Volume NA  
Injection 3 of 4  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:25 AM



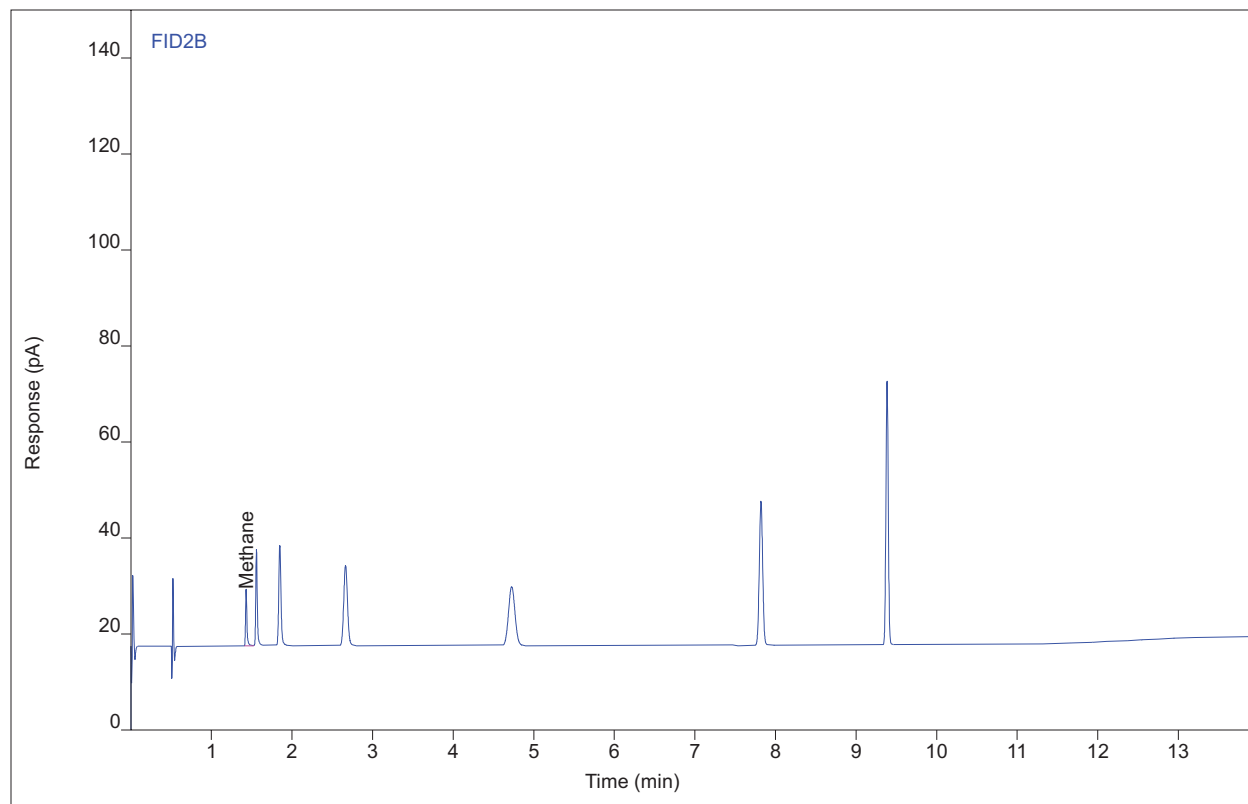
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.43 | 14.4822 | 11.7200 | 40.9282 | 1  | 40.9282 | ppm  |

# Chromatogram Report

Sample Name ROSIEP115 #C4 ENV(1=424,4=400)  
Sequence Name ROSIEP145 ver.1  
Inj Data File 026B0204.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/27/2019 3:22 PM  
File Modified 1/28/2019 8:19 AM  
Instrument Rosie  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 26  
Injection Volume NA  
Injection 4 of 4  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:25 AM



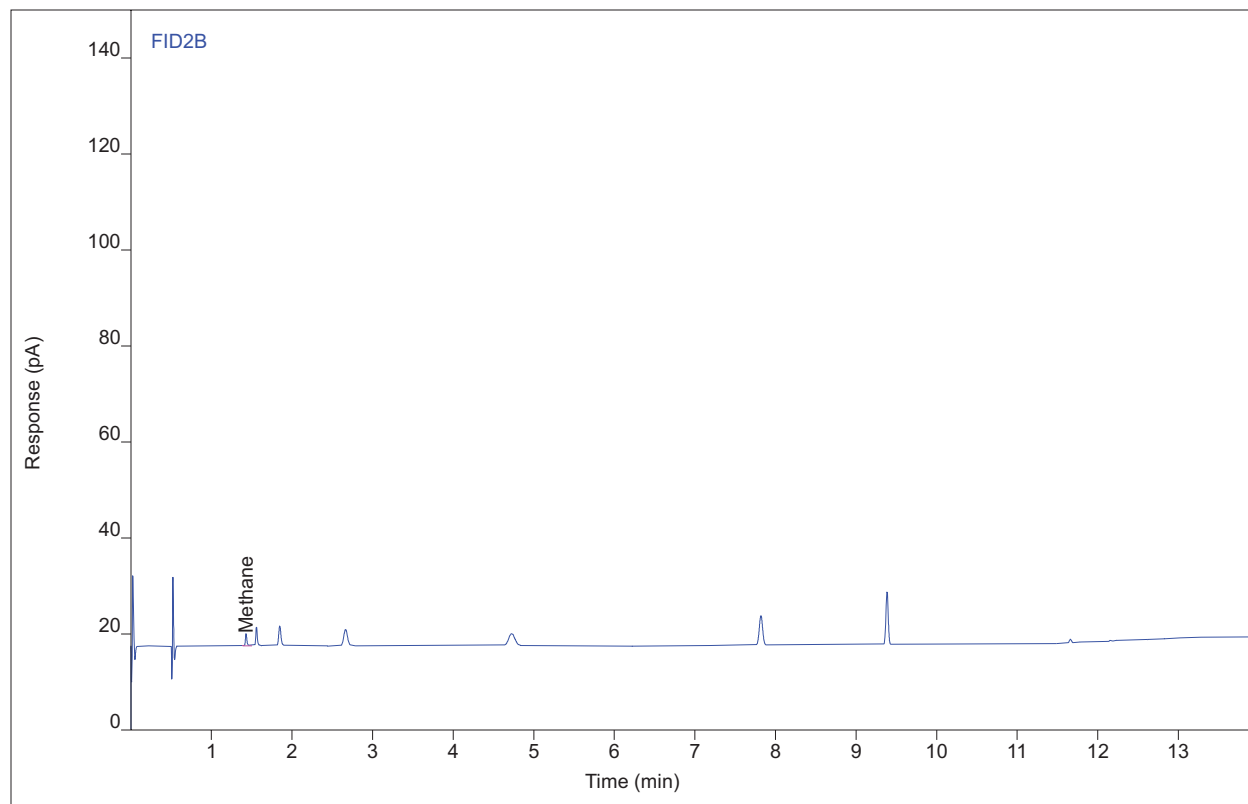
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.43 | 14.2313 | 11.6635 | 40.2189 | 1  | 40.2189 | ppm  |

# Chromatogram Report

Sample Name 0119-087.Run 1 SP.Bag  
Sequence Name ROSIEP145 ver.1  
Inj Data File 019B0301.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/27/2019 3:43 PM  
File Modified 1/28/2019 8:19 AM  
Instrument Rosie  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 19  
Injection Volume NA  
Injection 1 of 3  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:25 AM



| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | MF   | 1.43 | 3.67199 | 2.64948 | 10.3670 | 1  | 10.3670 | ppm  |

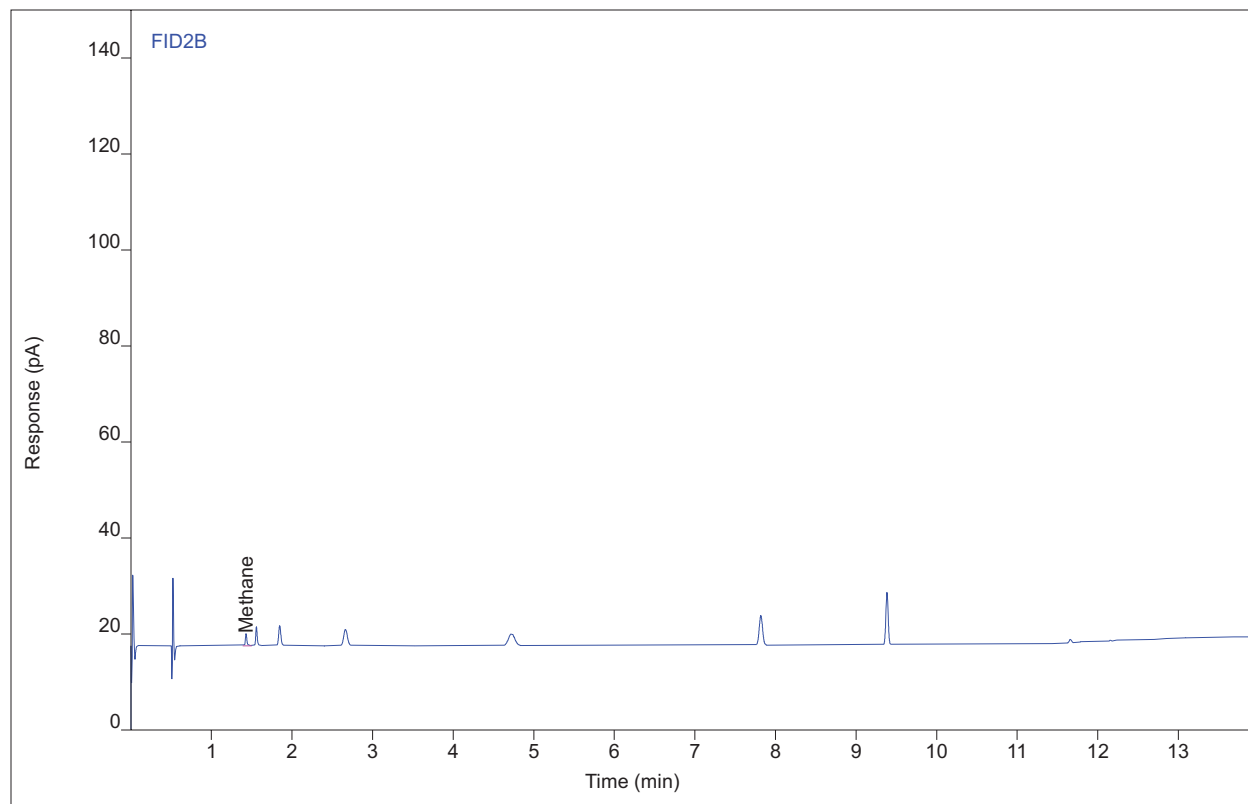


# Chromatogram Report

Sample Name 0119-087.Run 1 SP.Bag  
Sequence Name ROSIEP145 ver.1  
Inj Data File 019B0302.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/27/2019 4:05 PM  
File Modified 1/28/2019 8:19 AM  
Instrument Rosie  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 19  
Injection Volume NA  
Injection 2 of 3  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:25 AM



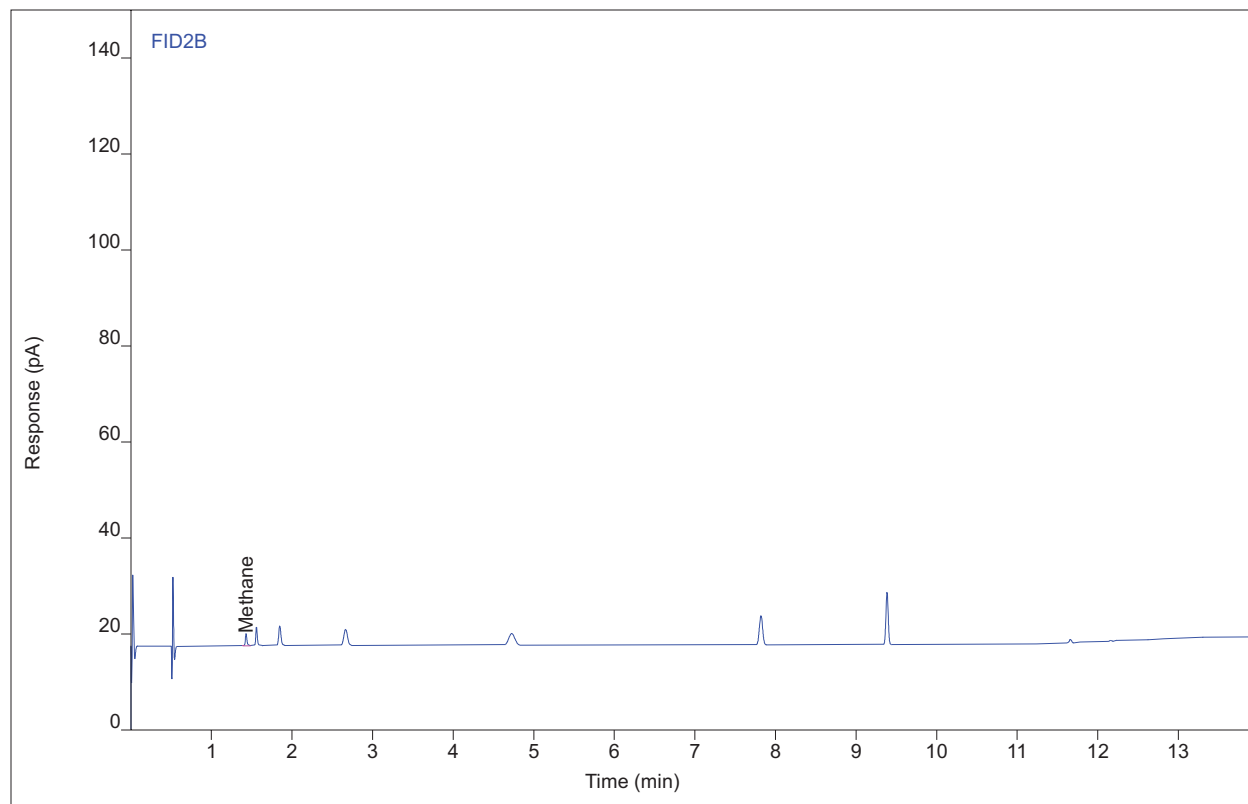
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | MF   | 1.43 | 3.77406 | 2.66107 | 10.6555 | 1  | 10.6555 | ppm  |

# Chromatogram Report

Sample Name 0119-087.Run 1 SP.Bag  
Sequence Name ROSIEP145 ver.1  
Inj Data File 019B0303.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/27/2019 4:26 PM  
File Modified 1/28/2019 8:20 AM  
Instrument Rosie  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 19  
Injection Volume NA  
Injection 3 of 3  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:25 AM



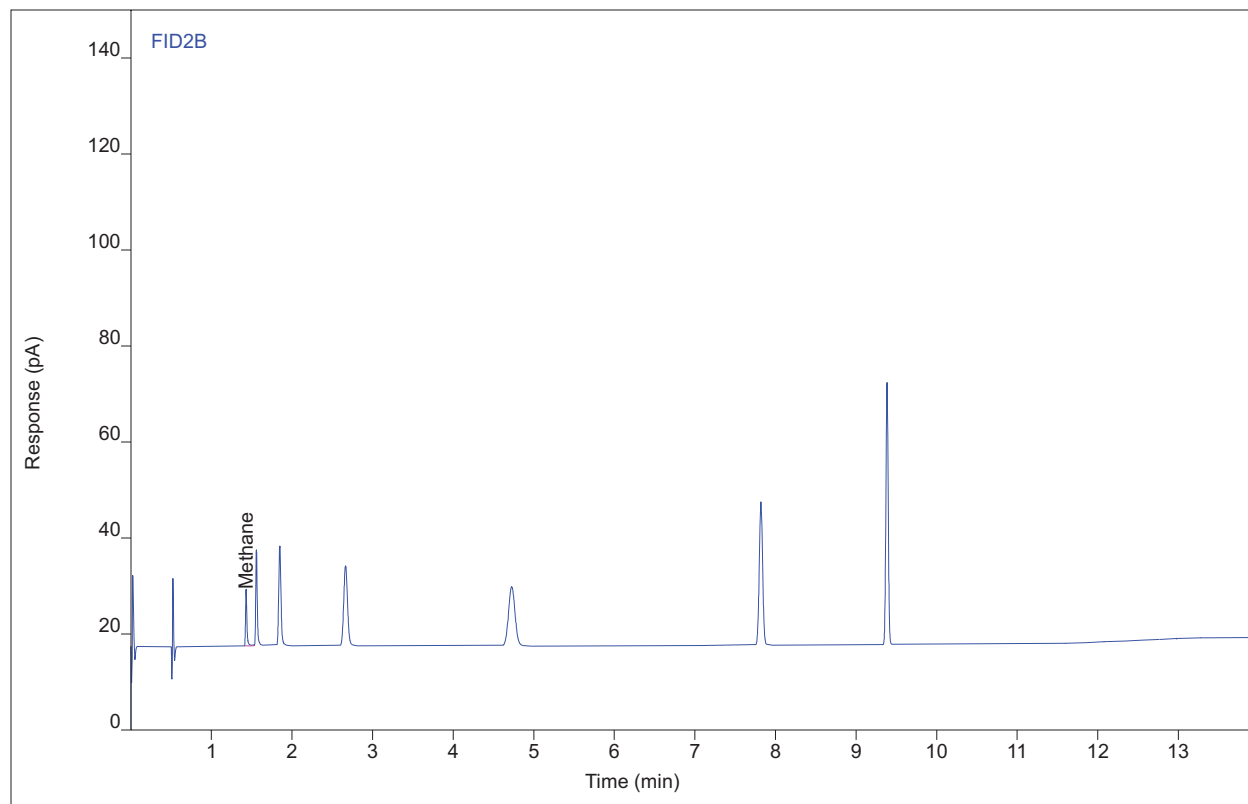
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | MF   | 1.43 | 3.65428 | 2.64023 | 10.3169 | 1  | 10.3169 | ppm  |

# Chromatogram Report

Sample Name ROSIEP115 #C4 ENV(1=424,4=400)  
Sequence Name ROSIEP145 ver.1  
Inj Data File 026B0402.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/27/2019 5:15 PM  
File Modified 1/28/2019 8:20 AM  
Instrument Rosie  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 26  
Injection Volume NA  
Injection 2 of 4  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:25 AM



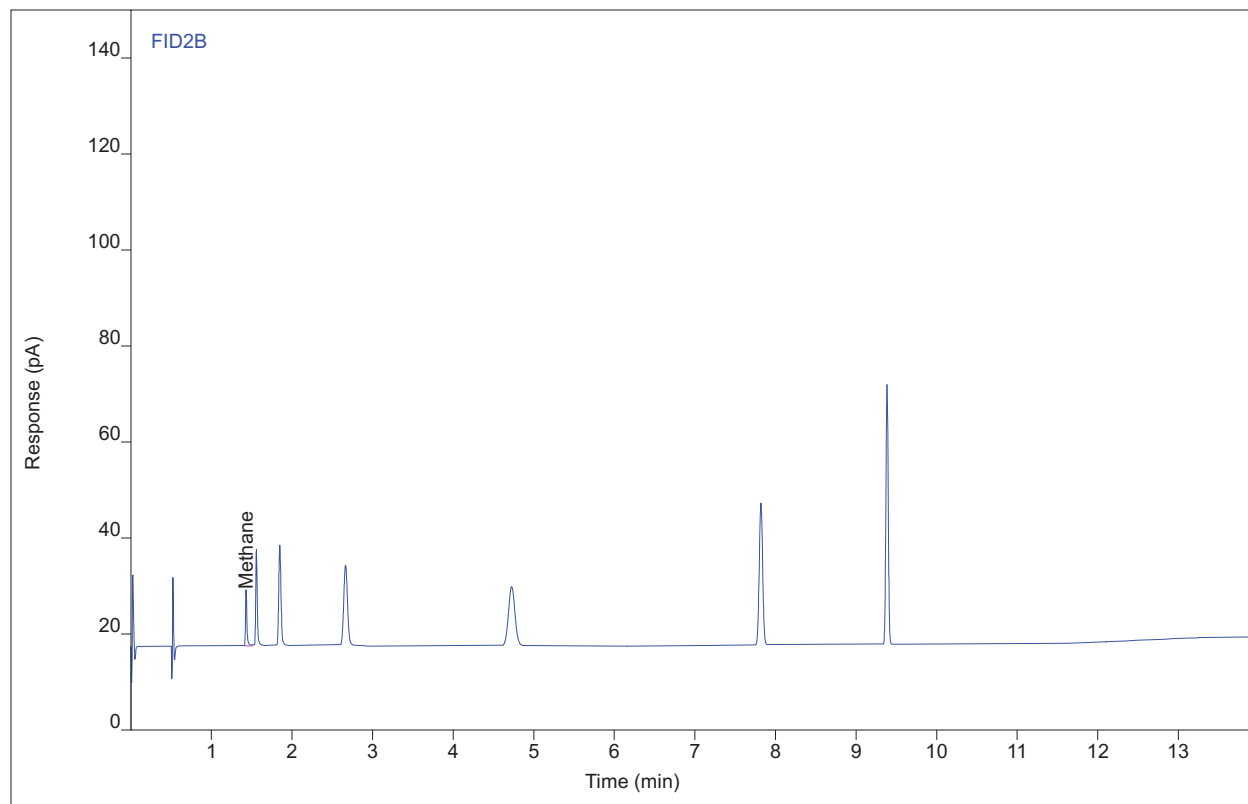
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.43 | 14.3706 | 11.6653 | 40.6128 | 1  | 40.6128 | ppm  |

# Chromatogram Report

Sample Name ROSIEP115 #C4 ENV(1=424,4=400)  
Sequence Name ROSIEP145 ver.1  
Inj Data File 026B0403.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/27/2019 5:39 PM  
File Modified 1/28/2019 8:20 AM  
Instrument Rosie  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 26  
Injection Volume NA  
Injection 3 of 4  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:25 AM



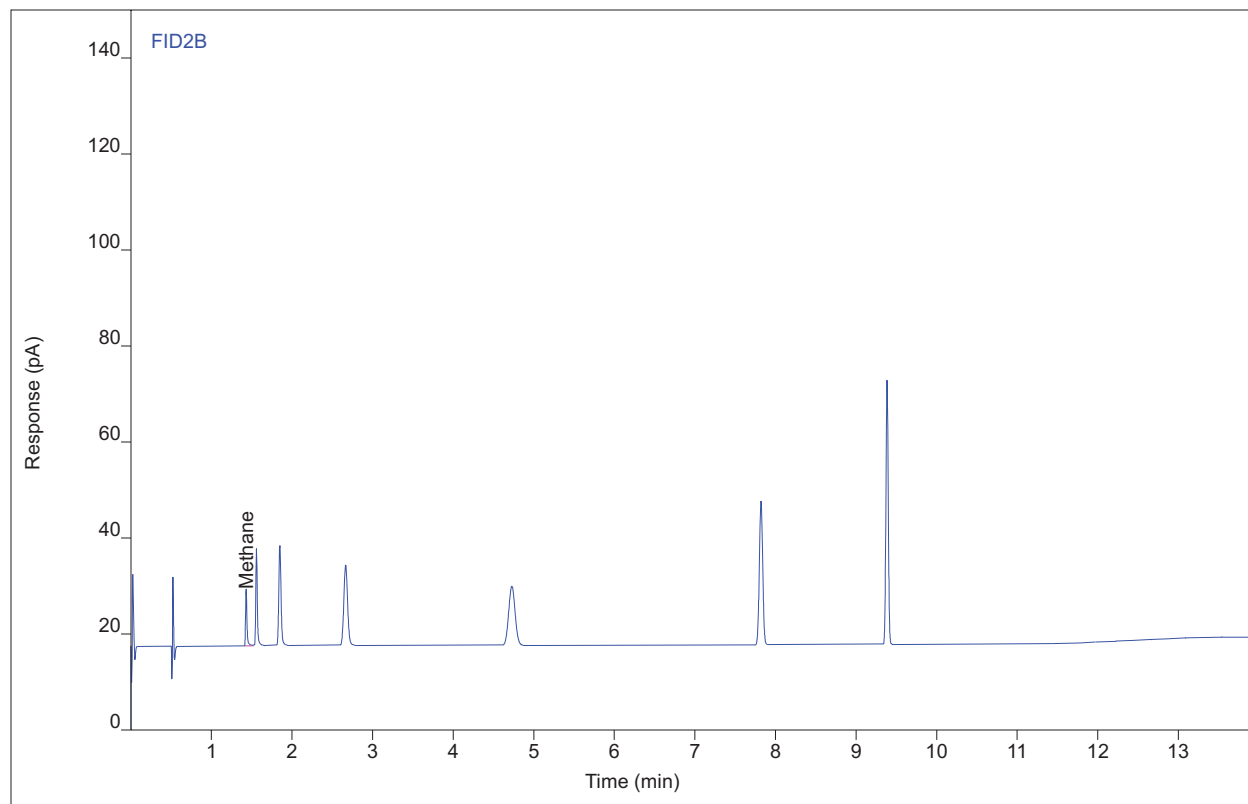
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.43 | 14.3778 | 11.6373 | 40.6330 | 1  | 40.6330 | ppm  |

# Chromatogram Report

Sample Name ROSIEP115 #C4 ENV(1=424,4=400)  
Sequence Name ROSIEP145 ver.1  
Inj Data File 026B0404.D  
File Location GC/2019/Rosie/Quarter 1  
Injection Date 1/27/2019 6:04 PM  
File Modified 1/28/2019 8:20 AM  
Instrument Rosie  
Operator Nicholas Traversa

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 26  
Injection Volume NA  
Injection 4 of 4  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 1/22/2019 5:22 AM  
Printed 1/28/2019 8:25 AM



| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.43 | 14.4553 | 11.7552 | 40.8520 | 1  | 40.8520 | ppm  |

## Enthalpy Analytical

Company: Air Control Techniques PC  
Job No.: 0119-087 EPA Method 18 Tedlar Bag  
Project No.: 2333 Enviva - GRE

ROSIEP082\_C1-C7.M  
Analysis Method Used:

## Methane -- Calibration Standards

| Sample ID                      | Filename<br>#1 | Filename<br>#2 | Filename<br>#3 | Ret<br>Time<br>(min) | Ret<br>Time<br>(min) | Ret<br>Time<br>(min) | %dif<br>RT | Conc<br>#1<br>(ppm) | Conc<br>#2<br>(ppm) | Conc<br>#3<br>(ppm) | %dif<br>conc | Avg<br>Conc<br>(ppm) | Standard<br>Tag | %<br>Tag |
|--------------------------------|----------------|----------------|----------------|----------------------|----------------------|----------------------|------------|---------------------|---------------------|---------------------|--------------|----------------------|-----------------|----------|
| ROSIEP115 #C4 ENV(1=424,4=400) | 026B2102.D     | 026B2103.D     | 026B2104.D     | 1.43                 | 1.43                 | 1.43                 | 0.0        | 40.7                | 40.4                | 40.3                | 0.6          | 40.5                 | 40.0            | 101      |
| He Blank #LB                   | 017B1101.D     | 017B1102.D     | 017B1103.D     | NA                   | NA                   | NA                   | NA         | 0.524               | 0.524               | 0.524               | 0.0          | 0.524                | ND              |          |
| ROSIEP115 #C4 ENV(1=424,4=400) | 026B1202.D     | 026B1203.D     | 026B1204.D     | 1.43                 | 1.43                 | 1.43                 | 0.0        | 41.2                | 41.1                | 41.5                | 0.5          | 41.3                 | 40.0            | 103      |
| ROSIEP115 #C4 ENV(1=424,4=400) | 026B0202.D     | 026B0203.D     | 026B0204.D     | 1.43                 | 1.43                 | 1.43                 | 0.0        | 40.9                | 40.9                | 40.2                | 1.2          | 40.7                 | 40.0            | 102      |
| ROSIEP115 #C4 ENV(1=424,4=400) | 026B0402.D     | 026B0403.D     | 026B0404.D     | 1.43                 | 1.43                 | 1.43                 | 0.0        | 40.6                | 40.6                | 40.9                | 0.4          | 40.7                 | 40.0            | 102      |

```
=====
                        Calibration Table
=====
```

Calib. Data Modified : Wednesday, November 14, 2018 8:02:51 AM

Rel. Reference Window : 1.000 %  
 Abs. Reference Window : 0.000 min  
 Rel. Non-ref. Window : 1.000 %  
 Abs. Non-ref. Window : 0.000 min  
 Uncalibrated Peaks : not reported  
 Partial Calibration : Yes, identified peaks are recalibrated  
 Correct All Ret. Times: No, only for identified peaks

Curve Type : Linear  
 Origin : Connected  
 Weight : Quadratic (Amnt)

Recalibration Settings:  
 Average Response : Average all calibrations  
 Average Retention Time: Floating Average New 75%

Calibration Report Options :  
 Printout of recalibrations within a sequence:  
     Calibration Table after Recalibration  
     Normal Report after Recalibration  
 If the sequence is done with bracketing:  
     Results of first cycle (ending previous bracket)

Signal 1: FID2 B,

| RetTime<br>[min] | Lvl<br>Sig | Amount<br>[ppm] | Area       | Amt/Area   | Ref Grp Name |
|------------------|------------|-----------------|------------|------------|--------------|
| 1.430            | 1 2        | 5.00000         | 1.75817    | 2.84387    | Methane      |
|                  | 3          | 20.00000        | 7.22710    | 2.76736    |              |
|                  | 4          | 40.00000        | 14.61188   | 2.73750    |              |
|                  | 5          | 100.00000       | 34.98189   | 2.85862    |              |
|                  | 6          | 5561.00000      | 1987.41703 | 2.79810    |              |
|                  | 7          | 4.99200e4       | 1.68861e4  | 2.95628    |              |
| 1.558            | 1 2        | 5.00000         | 3.42997    | 1.45774    | Ethane       |
|                  | 3          | 20.00000        | 14.01885   | 1.42665    |              |
|                  | 4          | 40.00000        | 28.24833   | 1.41601    |              |
|                  | 5          | 100.00000       | 66.51178   | 1.50349    |              |
|                  | 6          | 5564.00000      | 3908.44775 | 1.42358    |              |
|                  | 7          | 4.99500e4       | 3.28573e4  | 1.52021    |              |
| 1.848            | 1 2        | 5.00000         | 5.36286    | 9.32338e-1 | Propane      |
|                  | 3          | 20.00000        | 21.25991   | 9.40738e-1 |              |
|                  | 4          | 40.00000        | 42.96450   | 9.31001e-1 |              |
|                  | 5          | 100.00000       | 100.36798  | 9.96334e-1 |              |
|                  | 6          | 5566.00000      | 5815.71908 | 9.57061e-1 |              |
|                  | 7          | 4.99700e4       | 4.95481e4  | 1.00851    |              |
| 2.665            | 1 2        | 5.00000         | 7.15856    | 6.98465e-1 | Butane       |
|                  | 3          | 20.00000        | 28.37661   | 7.04806e-1 |              |
|                  | 4          | 40.00000        | 56.87943   | 7.03242e-1 |              |
|                  | 5          | 100.00000       | 133.08791  | 7.51383e-1 |              |
|                  | 6          | 1113.00000      | 1573.80908 | 7.07201e-1 |              |
|                  | 7          | 9991.00000      | 1.33395e4  | 7.48977e-1 |              |
| 4.729            | 1 2        | 5.00000         | 9.28642    | 5.38420e-1 | Pentane      |
|                  | 3          | 20.00000        | 36.48395   | 5.48186e-1 |              |
|                  | 4          | 40.00000        | 73.19273   | 5.46502e-1 |              |
|                  | 5          | 100.00000       | 170.43754  | 5.86725e-1 |              |

| RetTime<br>[min]                              | Lvl<br>Sig | Amount<br>[ppm] | Area       | Amt/Area   | Ref Grp Name |
|-----------------------------------------------|------------|-----------------|------------|------------|--------------|
| ----- --- --- ----- ----- ----- --- --- ----- |            |                 |            |            |              |
|                                               |            | 6 556.00000     | 1000.59776 | 5.55668e-1 |              |
|                                               |            | 7 4995.00000    | 8457.50391 | 5.90600e-1 |              |
| 7.822                                         | 1          | 2 5.00000       | 11.42911   | 4.37479e-1 | Hexane       |
|                                               |            | 3 20.00000      | 45.69358   | 4.37698e-1 |              |
|                                               |            | 4 40.00000      | 91.82283   | 4.35622e-1 |              |
|                                               |            | 5 100.00000     | 212.44948  | 4.70700e-1 |              |
|                                               |            | 6 446.00000     | 1008.85931 | 4.42083e-1 |              |
|                                               |            | 7 4001.00000    | 8344.50651 | 4.79477e-1 |              |
| 9.386                                         | 1          | 2 5.00000       | 15.56155   | 3.21305e-1 | Heptane      |
|                                               |            | 3 20.00000      | 61.72245   | 3.24031e-1 |              |
|                                               |            | 4 40.00000      | 122.89329  | 3.25486e-1 |              |
|                                               |            | 5 100.00000     | 280.55623  | 3.56435e-1 |              |

More compound-specific settings:

Compound: Methane

Time Window : From 1.409 min To 1.449 min

Compound: Ethane

Time Window : From 1.520 min To 1.580 min

Compound: Propane

Time Window : From 1.790 min To 1.900 min

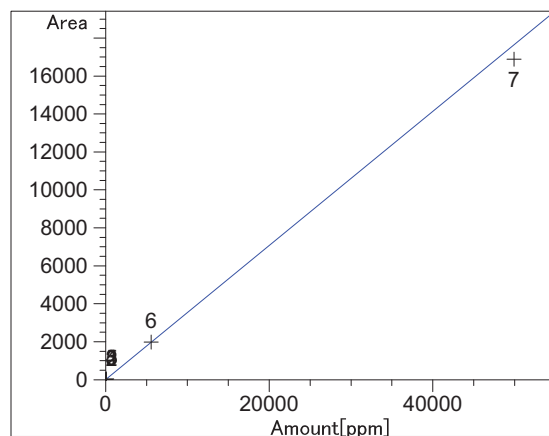
Compound: Butane

Time Window : From 2.619 min To 2.679 min

#### Peak Sum Table

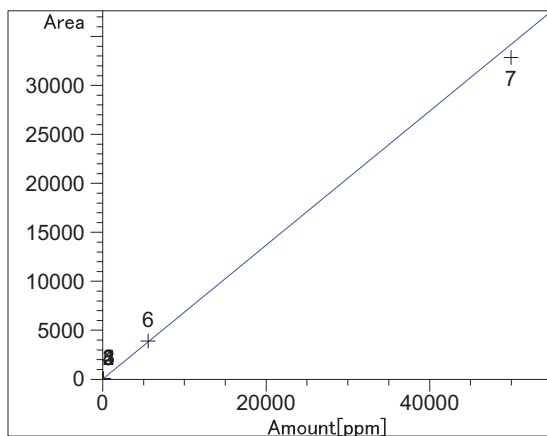
| Name                                      | StartTime<br>[min] | EndTime<br>[min] | Use<br>Reference | Response<br>factor | Multiplier | ISTD<br>Peak |
|-------------------------------------------|--------------------|------------------|------------------|--------------------|------------|--------------|
| ----- ----- ----- ----- ----- ----- ----- |                    |                  |                  |                    |            |              |
| as Ethane                                 | 2.000              | 2.265            | None             | 1.4937             | 1.4937     | None         |
| as Propane                                | 2.265              | 2.839            | None             | 9.8901e-1          | 0.9890     | None         |
| as Butane                                 | 2.839              | 4.332            | None             | 7.3667e-1          | 0.7367     | None         |
| as Pentane                                | 4.332              | 6.736            | None             | 5.6498e-1          | 0.5650     | None         |
| as Hexane                                 | 6.736              | 8.796            | None             | 4.2535e-1          | 0.4253     | None         |
| as Heptane                                | 8.796              | 14.000           | None             | 2.7188e-1          | 0.2719     | None         |

#### Calibration Curves

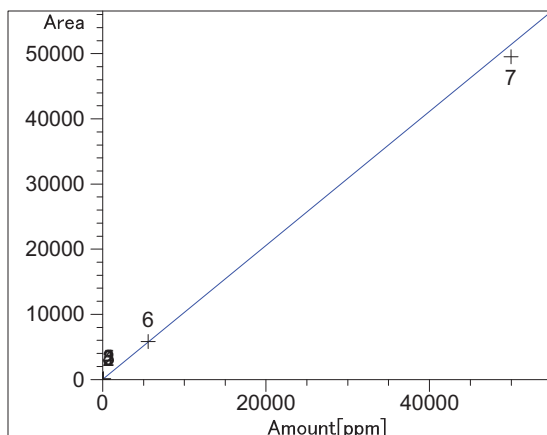


Methane at exp. RT: 1.430  
 FID2 B,  
 Correlation: 0.99955  
 Residual Std. Dev.: 386.02480  
 Formula:  $y = mx + b$   
     m: 3.53723e-1  
     b: 4.95789e-3  
     x: Amount  
     y: Area  
 Calibration Level Weights:  
     Level 2 : 1  
     Level 3 : 0.0625  
     Level 4 : 0.015625  
     Level 5 : 0.0025  
     Level 6 : 8.08415e-007  
     Level 7 : 1.00321e-008

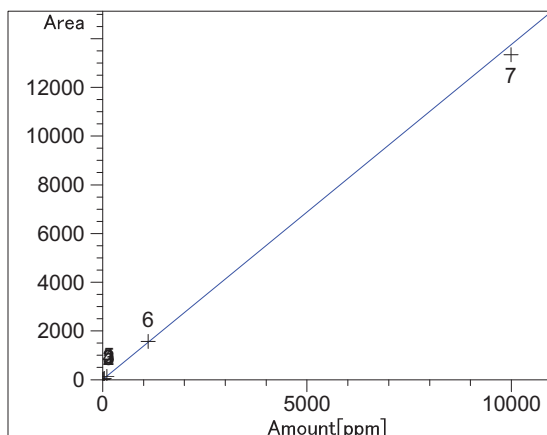




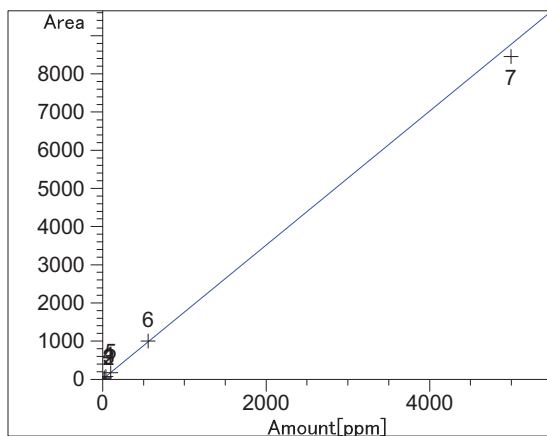
Ethane at exp. RT: 1.558  
FID2 B,  
Correlation: 0.99946  
Residual Std. Dev.: 679.43864  
Formula:  $y = mx + b$   
m: 6.84938e-1  
b: 3.11796e-2  
x: Amount  
y: Area  
Calibration Level Weights:  
Level 2 : 1  
Level 3 : 0.0625  
Level 4 : 0.015625  
Level 5 : 0.0025  
Level 6 : 8.07543e-007  
Level 7 : 1.002e-008



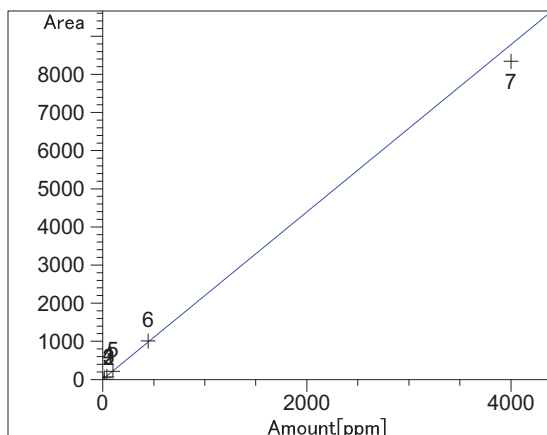
Propane at exp. RT: 1.848  
FID2 B,  
Correlation: 0.99949  
Residual Std. Dev.: 944.41574  
Formula:  $y = mx + b$   
m: 1.02931  
b: 2.59154e-1  
x: Amount  
y: Area  
Calibration Level Weights:  
Level 2 : 1  
Level 3 : 0.0625  
Level 4 : 0.015625  
Level 5 : 0.0025  
Level 6 : 8.06963e-007  
Level 7 : 1.0012e-008



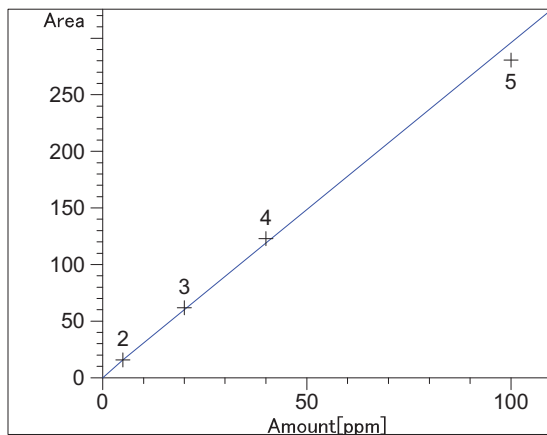
Butane at exp. RT: 2.665  
FID2 B,  
Correlation: 0.99951  
Residual Std. Dev.: 209.93292  
Formula:  $y = mx + b$   
m: 1.37694  
b: 3.17925e-1  
x: Amount  
y: Area  
Calibration Level Weights:  
Level 2 : 1  
Level 3 : 0.0625  
Level 4 : 0.015625  
Level 5 : 0.0025  
Level 6 : 0.00002  
Level 7 : 2.50451e-007



Pentane at exp. RT: 4.729  
FID2 B,  
Correlation: 0.99943  
Residual Std. Dev.: 161.31053  
Formula:  $y = mx + b$   
m: 1.75749  
b: 5.69840e-1  
x: Amount  
y: Area  
Calibration Level Weights:  
Level 2 : 1  
Level 3 : 0.0625  
Level 4 : 0.015625  
Level 5 : 0.0025  
Level 6 : 0.000081  
Level 7 : 1.002e-006



Hexane at exp. RT: 7.822  
FID2 B,  
Correlation: 0.99914  
Residual Std. Dev.: 221.94403  
Formula:  $y = mx + b$   
m: 2.19615  
b: 5.60918e-1  
x: Amount  
y: Area  
Calibration Level Weights:  
Level 2 : 1  
Level 3 : 0.0625  
Level 4 : 0.015625  
Level 5 : 0.0025  
Level 6 : 0.000126  
Level 7 : 1.56172e-006



Heptane at exp. RT: 9.386  
FID2 B,  
Correlation: 0.99887  
Residual Std. Dev.: 11.48665  
Formula:  $y = mx + b$   
m: 2.95319  
b: 9.24731e-1  
x: Amount  
y: Area  
Calibration Level Weights:  
Level 2 : 1  
Level 3 : 0.0625  
Level 4 : 0.015625  
Level 5 : 0.0025

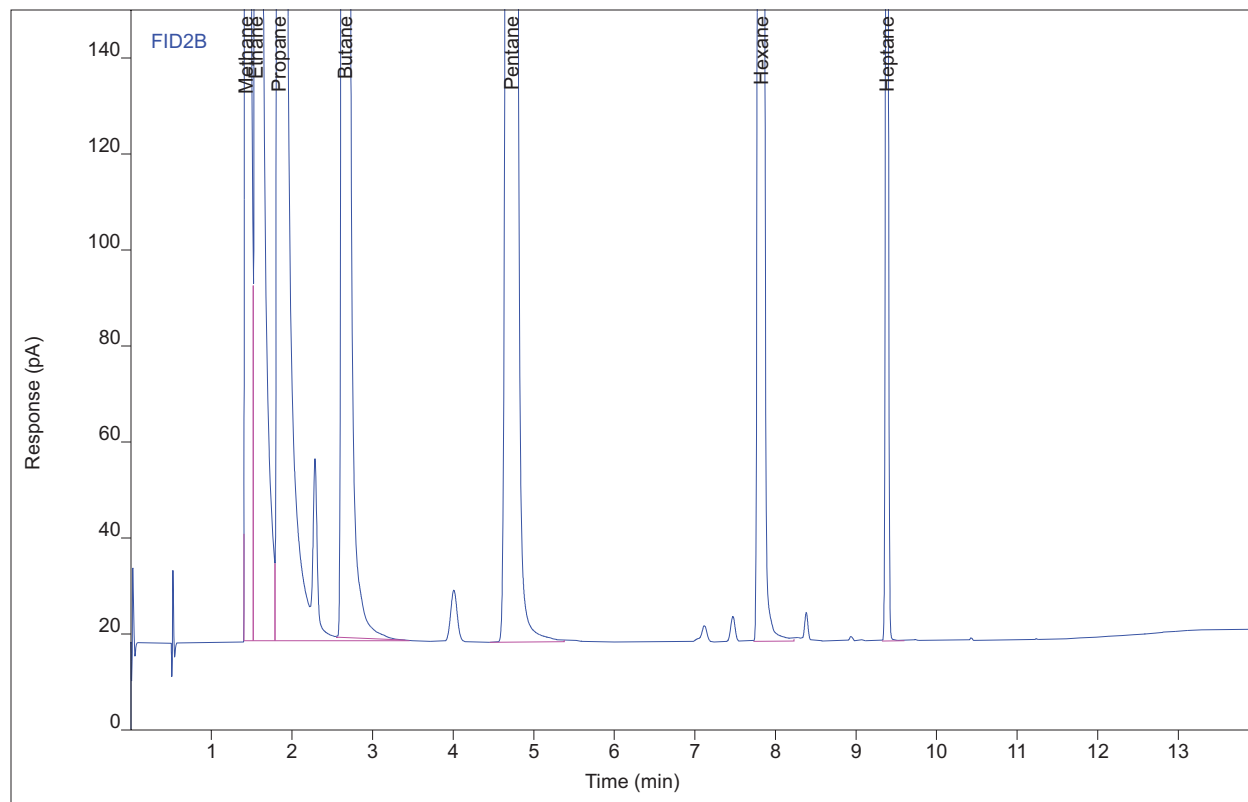
=====

# Chromatogram Report

# Enthalpy Analytical

Sample Name ROSIEP082 #C7 ENV(1=0,6=438.21)  
Sequence Name ROSIEP082A ver.2  
Inj Data File 026B0102.D  
File Location GC/2018/Rosie/Quarter 1  
Injection Date 11/12/2018 9:41 AM  
File Modified 11/27/2018 10:47 AM  
Instrument  
Operator Jennie Parrish

Sample Type  
Vial Number Vial 26  
Injection Volume NA  
Injection 2 of 4  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 11/14/2018 8:03 AM  
Printed 11/27/2018 11:01 AM



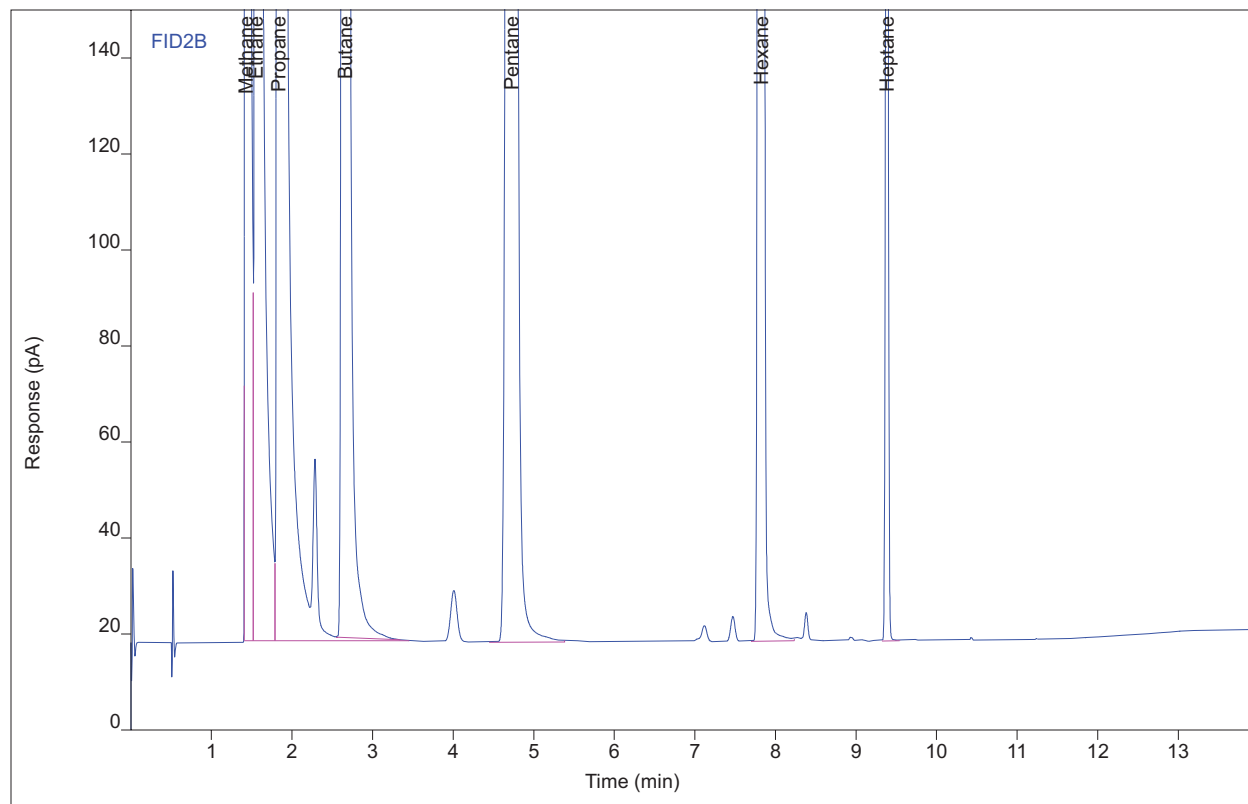
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV S | 1.43 | 16896.3 | 13737.3 | 47767.0 | 1  | 47767.0 | ppm  |
| Ethane   | VV S | 1.55 | 32872.8 | 23382.5 | 47993.8 | 1  | 47993.8 | ppm  |
| Propane  | VB S | 1.83 | 49570.3 | 23443.4 | 48158.4 | 1  | 48158.4 | ppm  |
| Butane   | BB T | 2.66 | 13348.3 | 3940.06 | 9693.95 | 1  | 9693.95 | ppm  |
| Pentane  | VB   | 4.72 | 8462.03 | 1473.14 | 4814.51 | 1  | 4814.51 | ppm  |
| Hexane   | BV   | 7.82 | 8350.11 | 2796.23 | 3801.90 | 1  | 3801.90 | ppm  |
| Heptane  | VB   | 9.38 | 671.570 | 330.259 | 227.091 | 1  | 227.091 | ppm  |

# Chromatogram Report

# Enthalpy Analytical

Sample Name ROSIEP082 #C7 ENV(1=0,6=438.21)  
Sequence Name ROSIEP082A ver.2  
Inj Data File 026B0103.D  
File Location GC/2018/Rosie/Quarter 1  
Injection Date 11/12/2018 10:05 AM  
File Modified 11/27/2018 10:48 AM  
Instrument  
Operator Jennie Parrish

Sample Type  
Vial Number Vial 26  
Injection Volume NA  
Injection 3 of 4  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 11/14/2018 8:03 AM  
Printed 11/27/2018 11:01 AM



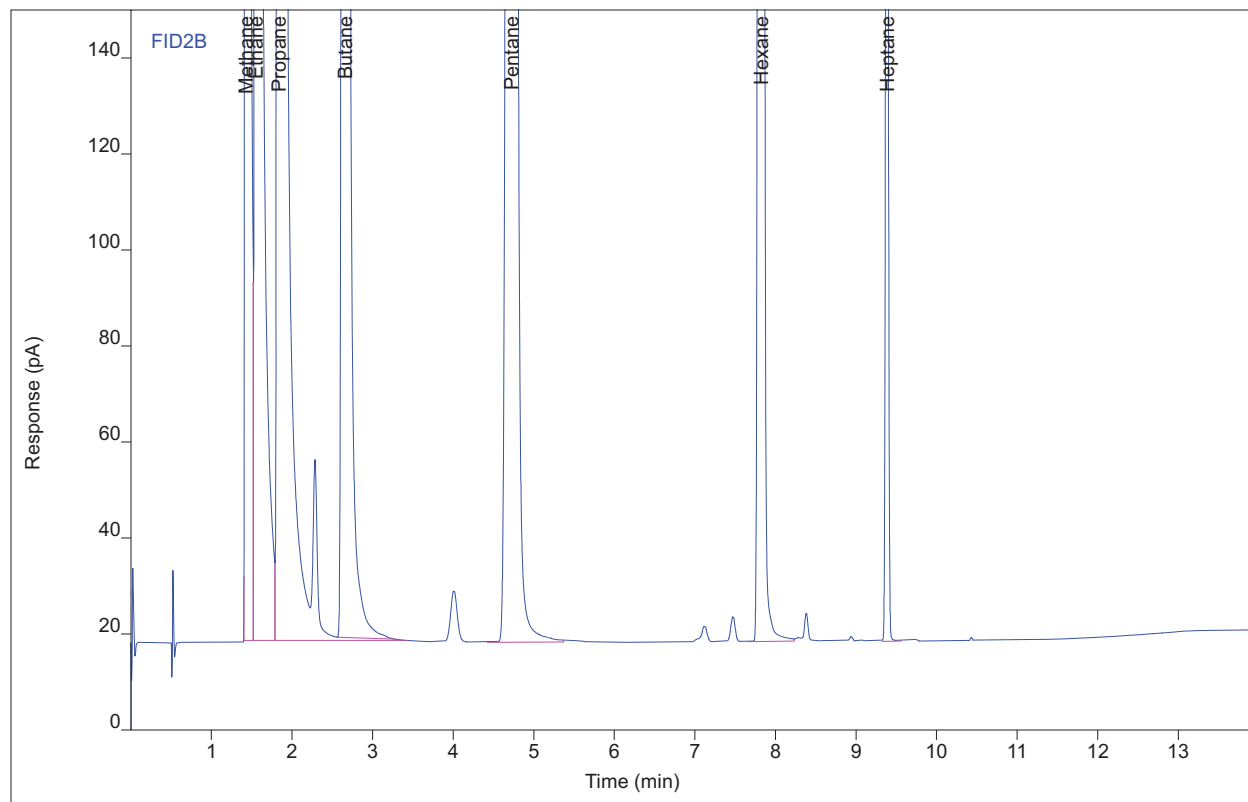
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV S | 1.43 | 16860.5 | 13637.1 | 47665.8 | 1  | 47665.8 | ppm  |
| Ethane   | VV S | 1.55 | 32810.9 | 23185.9 | 47903.4 | 1  | 47903.4 | ppm  |
| Propane  | VB S | 1.83 | 49482.9 | 23628.5 | 48073.5 | 1  | 48073.5 | ppm  |
| Butane   | BB T | 2.66 | 13322.0 | 3929.24 | 9674.79 | 1  | 9674.79 | ppm  |
| Pentane  | VB   | 4.72 | 8446.69 | 1464.59 | 4805.77 | 1  | 4805.77 | ppm  |
| Hexane   | BV   | 7.82 | 8333.25 | 2809.08 | 3794.22 | 1  | 3794.22 | ppm  |
| Heptane  | VB   | 9.38 | 669.165 | 328.779 | 226.277 | 1  | 226.277 | ppm  |

# Chromatogram Report

# Enthalpy Analytical

Sample Name ROSIEP082 #C7 ENV(1=0,6=438.21)  
 Sequence Name ROSIEP082A ver.2  
 Inj Data File 026B0104.D  
 File Location GC/2018/Rosie/Quarter 1  
 Injection Date 11/12/2018 10:30 AM  
 File Modified 11/27/2018 10:48 AM  
 Instrument  
 Operator Jennie Parrish

Sample Type  
 Vial Number Vial 26  
 Injection Volume NA  
 Injection 4 of 4  
 Acquisition Method AQM\_ROSIEP080.M  
 Analysis Method ROSIEP082\_C1-C7.M  
 Method Modified 11/14/2018 8:03 AM  
 Printed 11/27/2018 11:01 AM



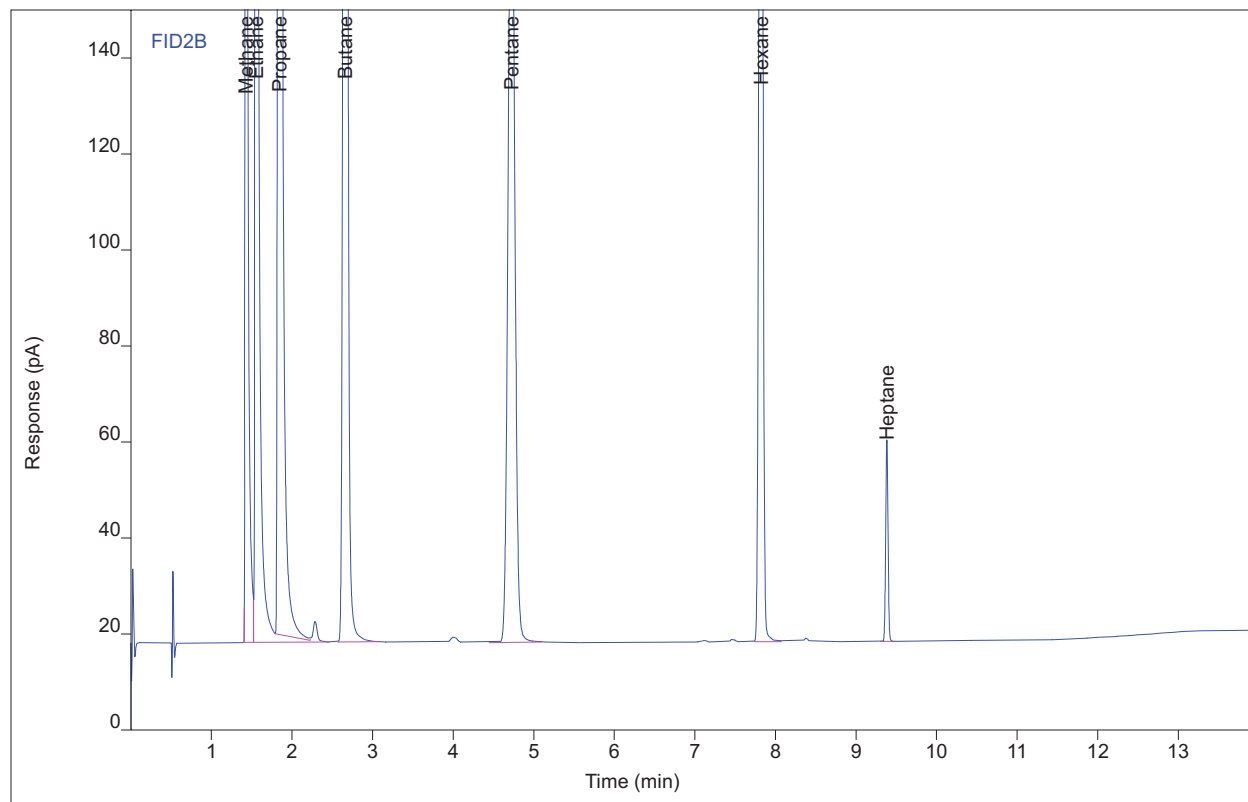
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV S | 1.43 | 16901.4 | 13729.4 | 47781.6 | 1  | 47781.6 | ppm  |
| Ethane   | VV S | 1.55 | 32888.2 | 23413.4 | 48016.2 | 1  | 48016.2 | ppm  |
| Propane  | VB S | 1.83 | 49591.2 | 23498.8 | 48178.7 | 1  | 48178.7 | ppm  |
| Butane   | BB T | 2.66 | 13348.3 | 3942.26 | 9693.91 | 1  | 9693.91 | ppm  |
| Pentane  | VB   | 4.72 | 8463.79 | 1471.57 | 4815.51 | 1  | 4815.51 | ppm  |
| Hexane   | BV   | 7.82 | 8350.16 | 2796.48 | 3801.92 | 1  | 3801.92 | ppm  |
| Heptane  | VB   | 9.38 | 670.864 | 330.563 | 226.853 | 1  | 226.853 | ppm  |

# Chromatogram Report

# Enthalpy Analytical

Sample Name ROSIEP082 #C6 ENV(1=1700.23,6=365.09)  
Sequence Name ROSIEP082A ver.2  
Inj Data File 026B0202.D  
File Location GC/2018/Rosie/Quarter 1  
Injection Date 11/12/2018 11:19 AM  
File Modified 11/27/2018 10:48 AM  
Instrument  
Operator Jennie Parrish

Sample Type  
Vial Number  
Injection Volume  
Injection  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 11/14/2018 8:03 AM  
Printed 11/27/2018 11:01 AM



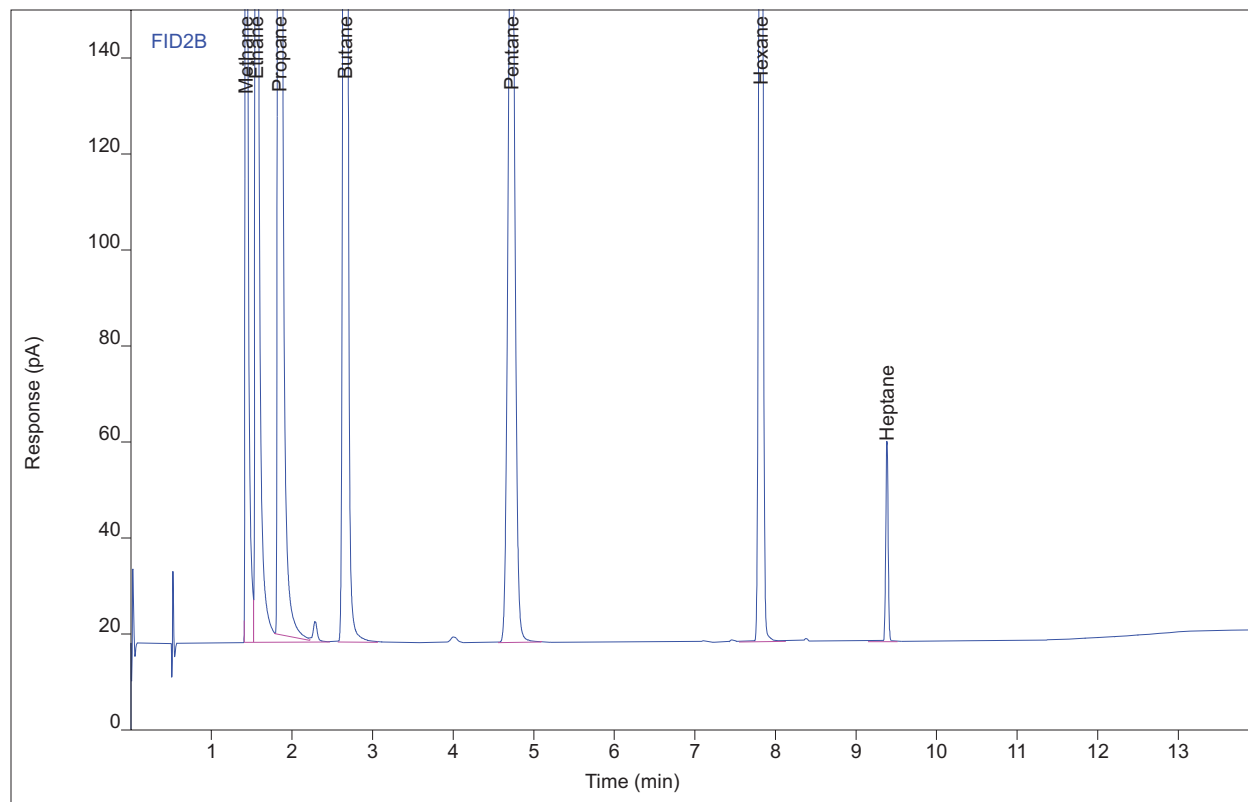
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.43 | 1986.70 | 1641.12 | 5616.53 | 1  | 5616.53 | ppm  |
| Ethane   | VB S | 1.56 | 3906.93 | 2795.13 | 5704.02 | 1  | 5704.02 | ppm  |
| Propane  | BV T | 1.84 | 5813.57 | 2903.62 | 5647.76 | 1  | 5647.76 | ppm  |
| Butane   | BB   | 2.66 | 1572.34 | 470.117 | 1141.68 | 1  | 1141.68 | ppm  |
| Pentane  | BB   | 4.72 | 999.712 | 175.216 | 568.504 | 1  | 568.504 | ppm  |
| Hexane   | BV   | 7.82 | 1009.66 | 337.920 | 459.486 | 1  | 459.486 | ppm  |
| Heptane  | VB   | 9.38 | 85.0527 | 41.8904 | 28.4871 | 1  | 28.4871 | ppm  |

# Chromatogram Report

# Enthalpy Analytical

Sample Name ROSIEP082 #C6 ENV(1=1700.23,6=365.09)  
 Sequence Name ROSIEP082A ver.2  
 Inj Data File 026B0203.D  
 File Location GC/2018/Rosie/Quarter 1  
 Injection Date 11/12/2018 11:44 AM  
 File Modified 11/27/2018 10:48 AM  
 Instrument  
 Operator Jennie Parrish

Sample Type  
 Vial Number Vial 26  
 Injection Volume NA  
 Injection 3 of 4  
 Acquisition Method AQM\_ROSIEP080.M  
 Analysis Method ROSIEP082\_C1-C7.M  
 Method Modified 11/14/2018 8:03 AM  
 Printed 11/27/2018 11:01 AM



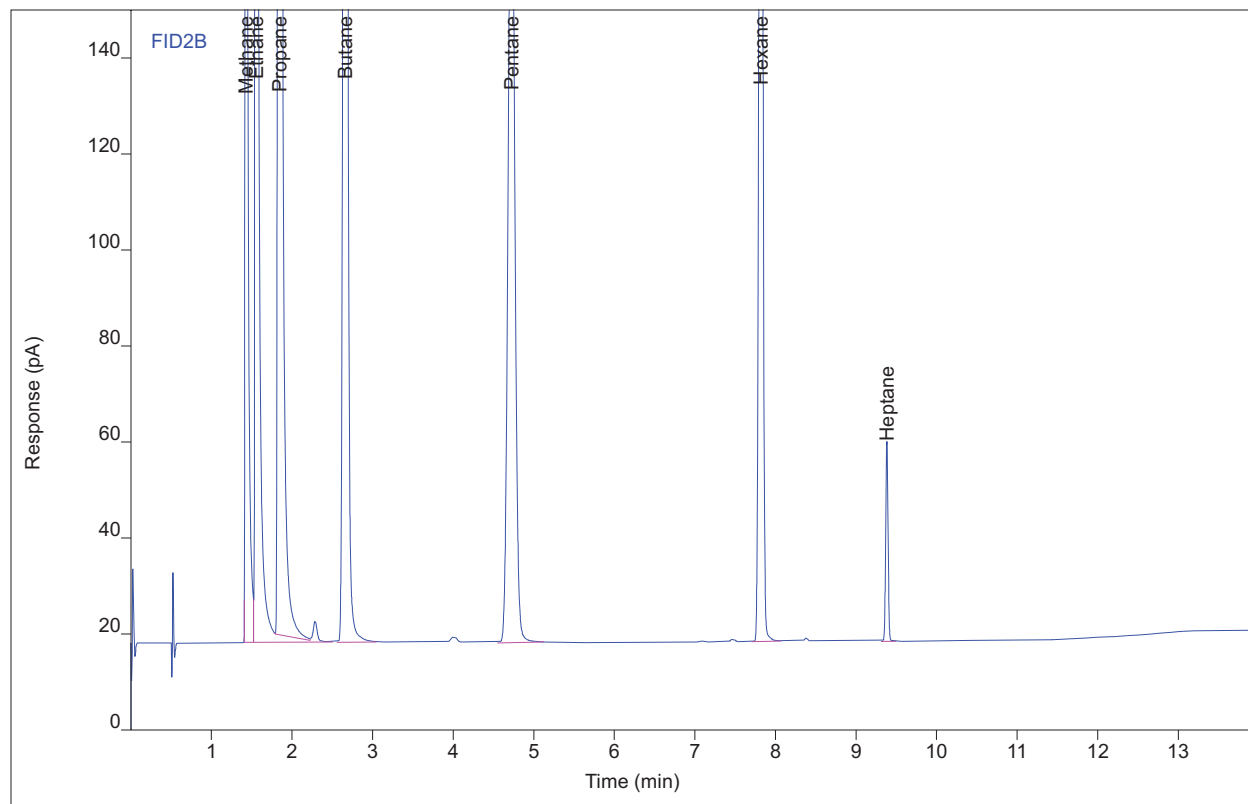
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.43 | 1986.79 | 1641.43 | 5616.77 | 1  | 5616.77 | ppm  |
| Ethane   | VB S | 1.56 | 3905.69 | 2792.95 | 5702.21 | 1  | 5702.21 | ppm  |
| Propane  | BV T | 1.84 | 5812.54 | 2905.82 | 5646.77 | 1  | 5646.77 | ppm  |
| Butane   | BB   | 2.66 | 1573.61 | 470.257 | 1142.60 | 1  | 1142.60 | ppm  |
| Pentane  | BB   | 4.72 | 999.995 | 175.533 | 568.665 | 1  | 568.665 | ppm  |
| Hexane   | VB   | 7.82 | 1007.94 | 339.865 | 458.700 | 1  | 458.700 | ppm  |
| Heptane  | VB   | 9.38 | 85.6645 | 41.7210 | 28.6943 | 1  | 28.6943 | ppm  |

# Chromatogram Report

# Enthalpy Analytical

Sample Name ROSIEP082 #C6 ENV(1=1700.23,6=365.09)  
 Sequence Name ROSIEP082A ver.2  
 Inj Data File 026B0204.D  
 File Location GC/2018/Rosie/Quarter 1  
 Injection Date 11/12/2018 12:08 PM  
 File Modified 11/27/2018 10:48 AM  
 Instrument  
 Operator Jennie Parrish

Sample Type  
 Vial Number Vial 26  
 Injection Volume NA  
 Injection 4 of 4  
 Acquisition Method AQM\_ROSIEP080.M  
 Analysis Method ROSIEP082\_C1-C7.M  
 Method Modified 11/14/2018 8:03 AM  
 Printed 11/27/2018 11:01 AM



| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.43 | 1988.76 | 1642.79 | 5622.36 | 1  | 5622.36 | ppm  |
| Ethane   | VB S | 1.56 | 3912.72 | 2798.13 | 5712.47 | 1  | 5712.47 | ppm  |
| Propane  | BV T | 1.84 | 5821.05 | 2906.87 | 5655.03 | 1  | 5655.03 | ppm  |
| Butane   | BV   | 2.66 | 1575.47 | 471.001 | 1143.95 | 1  | 1143.95 | ppm  |
| Pentane  | VB   | 4.72 | 1002.09 | 175.648 | 569.855 | 1  | 569.855 | ppm  |
| Hexane   | VB   | 7.82 | 1008.98 | 341.100 | 459.174 | 1  | 459.174 | ppm  |
| Heptane  | VB   | 9.38 | 84.9782 | 41.7746 | 28.4619 | 1  | 28.4619 | ppm  |

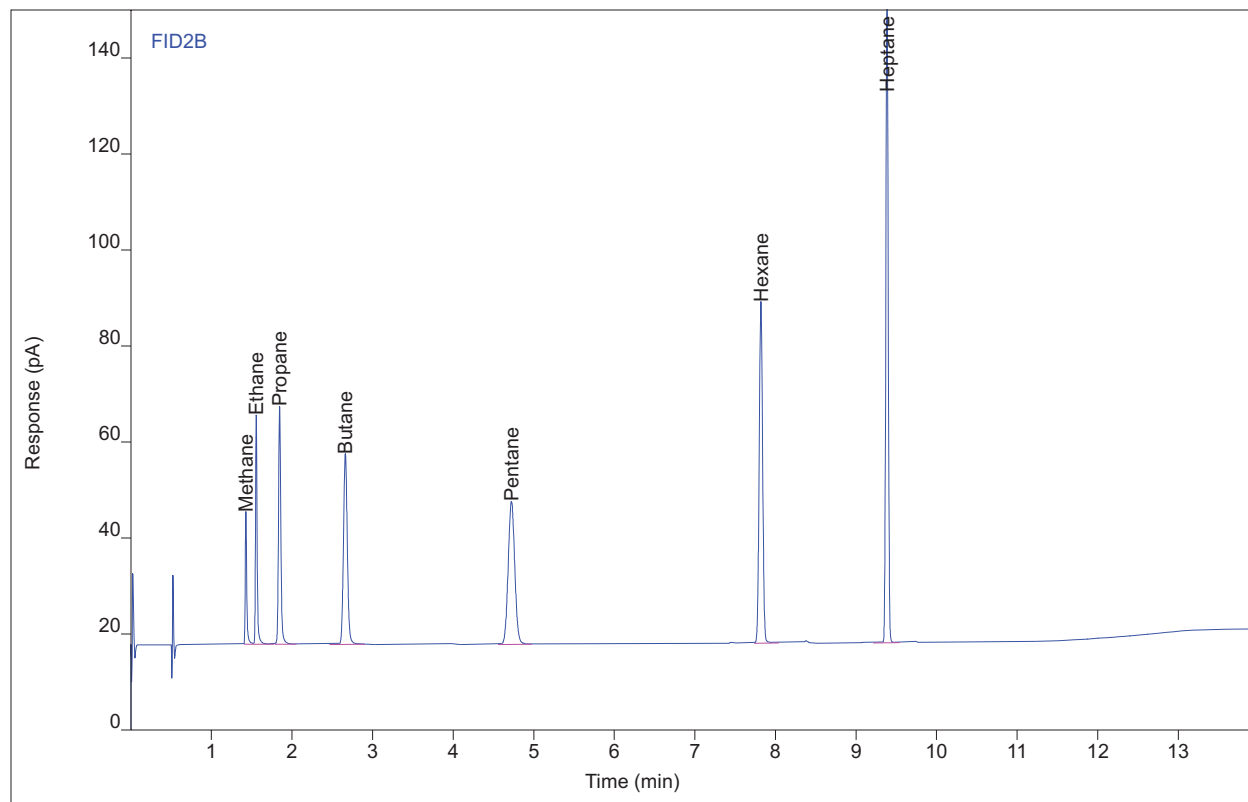


# Chromatogram Report

# Enthalpy Analytical

Sample Name ROSIEP082 #C5 ENV(1=0,4=400)  
Sequence Name ROSIEP082 ver.2  
Inj Data File 026B0202.D  
File Location GC/2018/Rosie/Quarter 1  
Injection Date 11/10/2018 1:33 AM  
File Modified 11/27/2018 10:42 AM  
Instrument Rosie  
Operator Jennie Parrish

Sample Type  
Vial Number  
Injection Volume  
Injection  
Acquisition Method  
Analysis Method  
Method Modified  
Printed  
Calibration  
Vial 26  
NA  
2 of 4  
AQM\_ROSIEP080.M  
ROSIEP082\_C1-C7.M  
11/14/2018 8:03 AM  
12/13/2018 1:02 PM



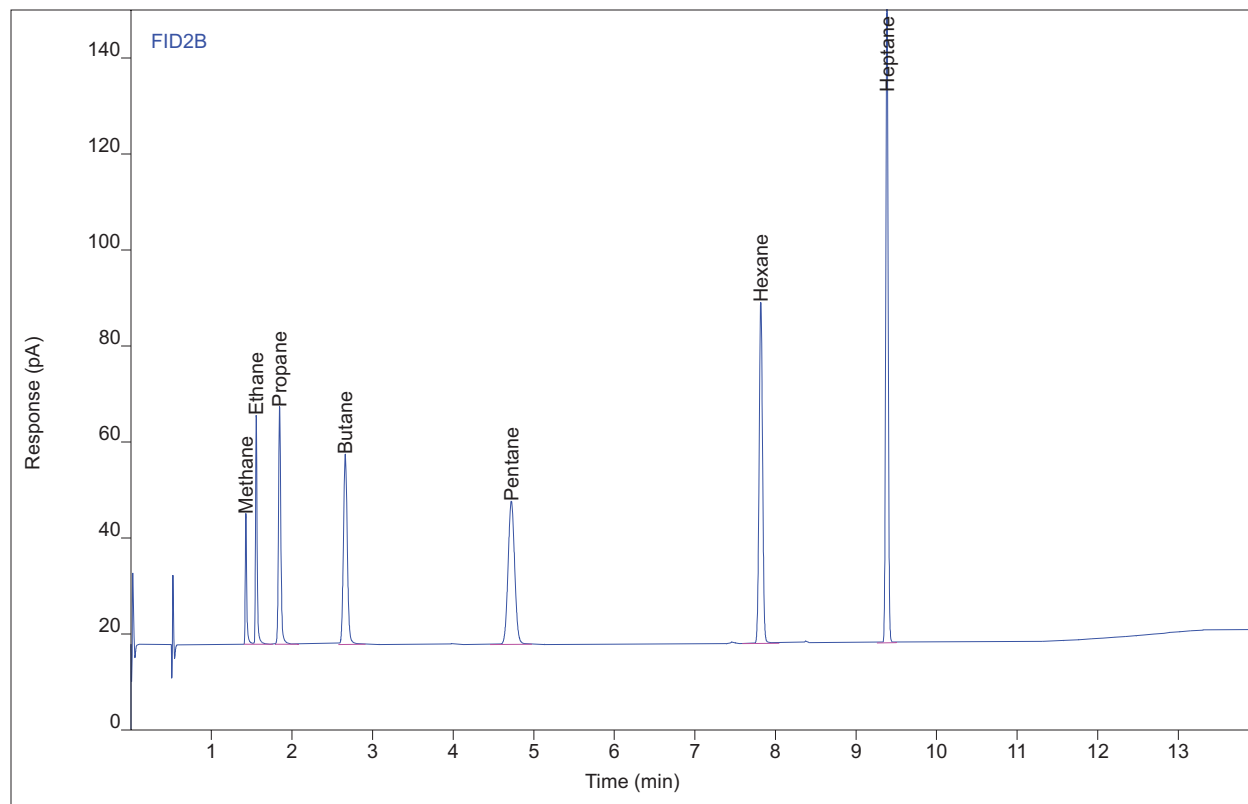
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.43 | 35.4224 | 27.4133 | 100.128 | 1  | 100.128 | ppm  |
| Ethane   | VB   | 1.56 | 66.6021 | 47.4095 | 97.1927 | 1  | 97.1927 | ppm  |
| Propane  | BB   | 1.85 | 100.182 | 49.4171 | 97.0772 | 1  | 97.0772 | ppm  |
| Butane   | VB   | 2.66 | 132.998 | 39.7009 | 96.3584 | 1  | 96.3584 | ppm  |
| Pentane  | BB   | 4.72 | 169.873 | 29.8588 | 96.3321 | 1  | 96.3321 | ppm  |
| Hexane   | BB   | 7.82 | 212.464 | 71.2231 | 96.4880 | 1  | 96.4880 | ppm  |
| Heptane  | BB   | 9.38 | 280.859 | 137.683 | 94.7904 | 1  | 94.7904 | ppm  |

# Chromatogram Report

# Enthalpy Analytical

Sample Name ROSIEP082 #C5 ENV(1=0,4=400)  
Sequence Name ROSIEP082 ver.2  
Inj Data File 026B0203.D  
File Location GC/2018/Rosie/Quarter 1  
Injection Date 11/10/2018 1:58 AM  
File Modified 11/27/2018 10:43 AM  
Instrument Rosie  
Operator Jennie Parrish

Sample Type  
Vial Number  
Injection Volume  
Injection  
Acquisition Method  
Analysis Method  
Method Modified  
Printed  
Calibration  
Vial 26  
NA  
3 of 4  
AQM\_ROSIEP080.M  
ROSIEP082\_C1-C7.M  
11/14/2018 8:03 AM  
12/13/2018 1:02 PM



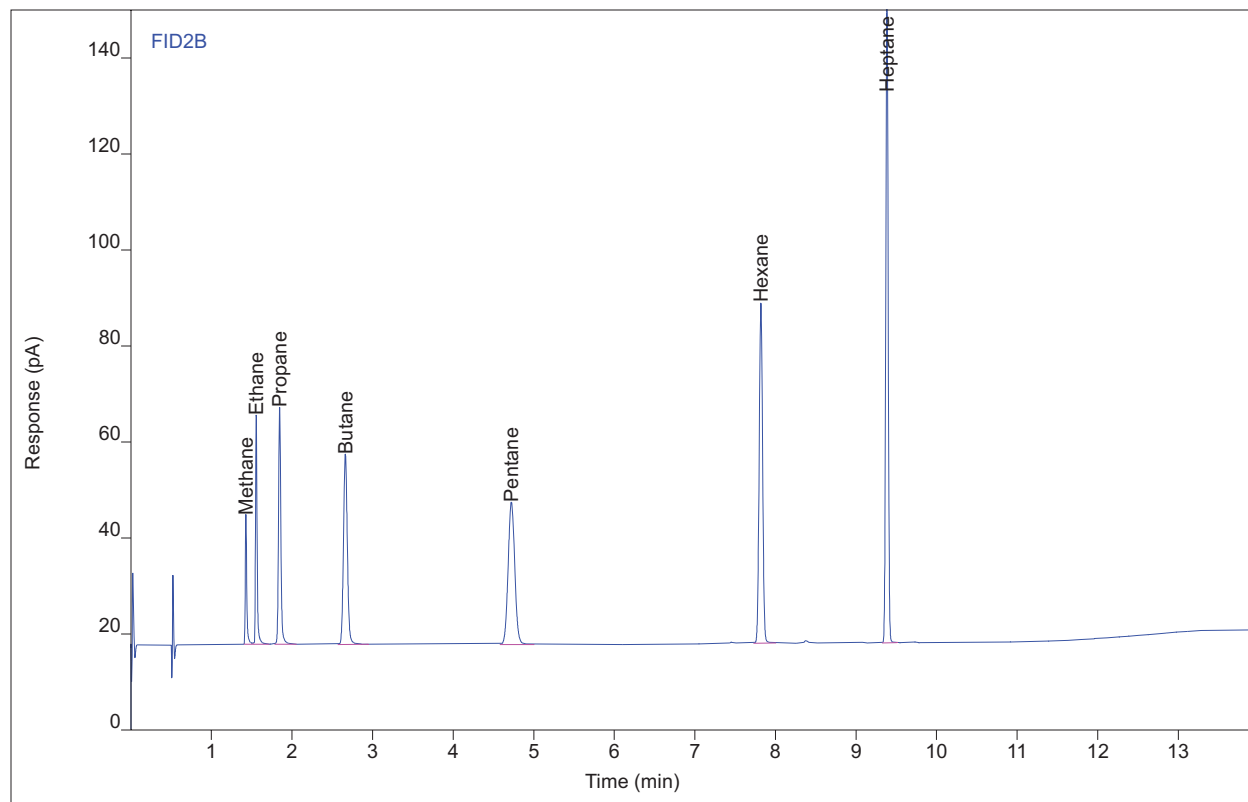
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.43 | 35.0460 | 27.0188 | 99.0634 | 1  | 99.0634 | ppm  |
| Ethane   | VB   | 1.56 | 66.6993 | 47.4974 | 97.3345 | 1  | 97.3345 | ppm  |
| Propane  | BV   | 1.85 | 100.737 | 49.4290 | 97.6164 | 1  | 97.6164 | ppm  |
| Butane   | BB   | 2.66 | 133.041 | 39.6367 | 96.3897 | 1  | 96.3897 | ppm  |
| Pentane  | VB   | 4.72 | 170.360 | 29.8895 | 96.6090 | 1  | 96.6090 | ppm  |
| Hexane   | VB   | 7.82 | 212.638 | 71.0156 | 96.5675 | 1  | 96.5675 | ppm  |
| Heptane  | VB   | 9.38 | 280.847 | 137.798 | 94.7863 | 1  | 94.7863 | ppm  |

# Chromatogram Report

# Enthalpy Analytical

Sample Name ROSIEP082 #C5 ENV(1=0,4=400)  
Sequence Name ROSIEP082 ver.2  
Inj Data File 026B0204.D  
File Location GC/2018/Rosie/Quarter 1  
Injection Date 11/10/2018 2:22 AM  
File Modified 11/27/2018 10:43 AM  
Instrument Rosie  
Operator Jennie Parrish

Sample Type  
Vial Number  
Injection Volume  
Injection  
Acquisition Method  
Analysis Method  
Method Modified  
Printed  
Calibration  
Vial 26  
NA  
4 of 4  
AQM\_ROSIEP080.M  
ROSIEP082\_C1-C7.M  
11/14/2018 8:03 AM  
12/13/2018 1:02 PM



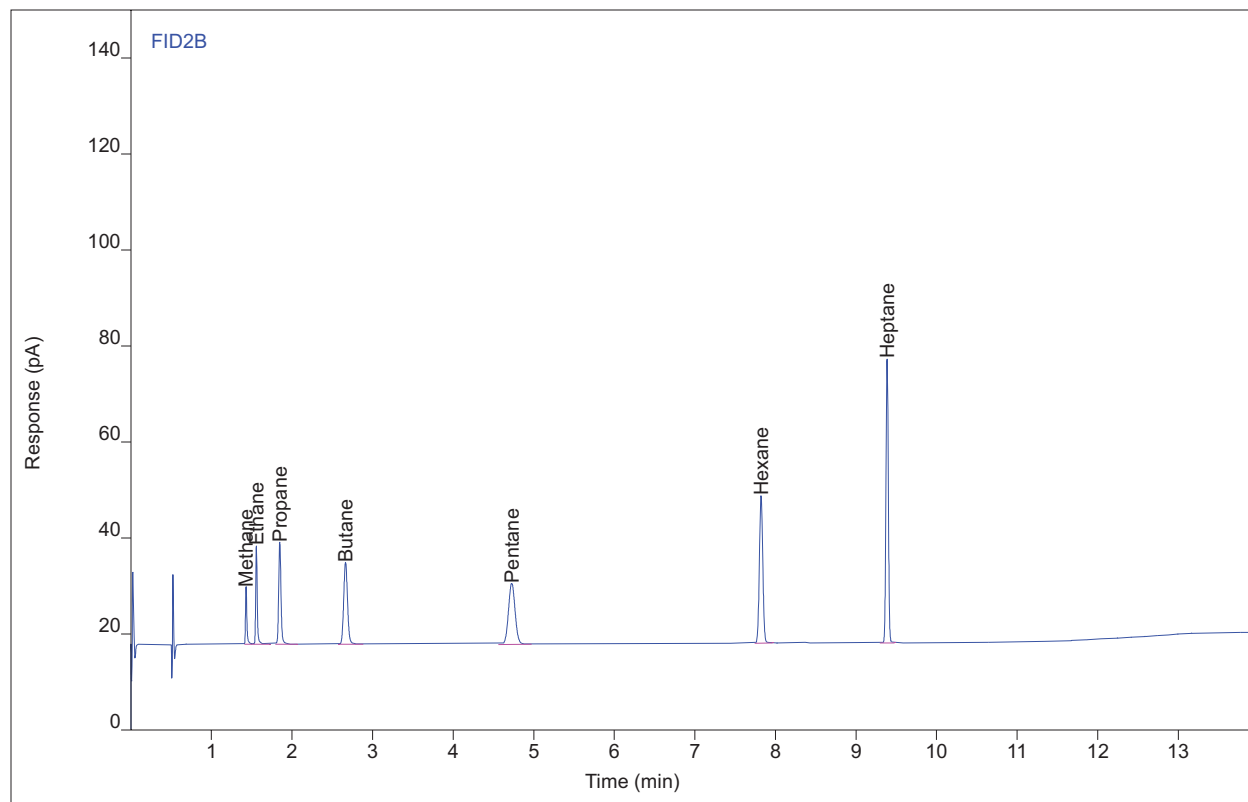
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.43 | 34.4773 | 26.7914 | 97.4557 | 1  | 97.4557 | ppm  |
| Ethane   | VB   | 1.56 | 66.2339 | 47.4142 | 96.6551 | 1  | 96.6551 | ppm  |
| Propane  | BB   | 1.85 | 100.185 | 49.3369 | 97.0804 | 1  | 97.0804 | ppm  |
| Butane   | VB   | 2.66 | 133.225 | 39.6708 | 96.5231 | 1  | 96.5231 | ppm  |
| Pentane  | BB   | 4.72 | 171.080 | 29.7498 | 97.0191 | 1  | 97.0191 | ppm  |
| Hexane   | BB   | 7.82 | 212.247 | 70.9457 | 96.3893 | 1  | 96.3893 | ppm  |
| Heptane  | VB   | 9.38 | 280.287 | 137.523 | 94.5966 | 1  | 94.5966 | ppm  |

# Chromatogram Report

# Enthalpy Analytical

Sample Name ROSIEP082 #C4 ENV(1=424,4=400)  
Sequence Name ROSIEP084 ver.2  
Inj Data File 026B1002.D  
File Location GC/2018/Rosie/Quarter 1  
Injection Date 11/13/2018 9:51 AM  
File Modified 11/27/2018 10:53 AM  
Instrument  
Operator Jennie Parrish

Sample Type  
Vial Number Vial 26  
Injection Volume NA  
Injection 2 of 4  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 11/14/2018 8:03 AM  
Printed 11/27/2018 11:01 AM



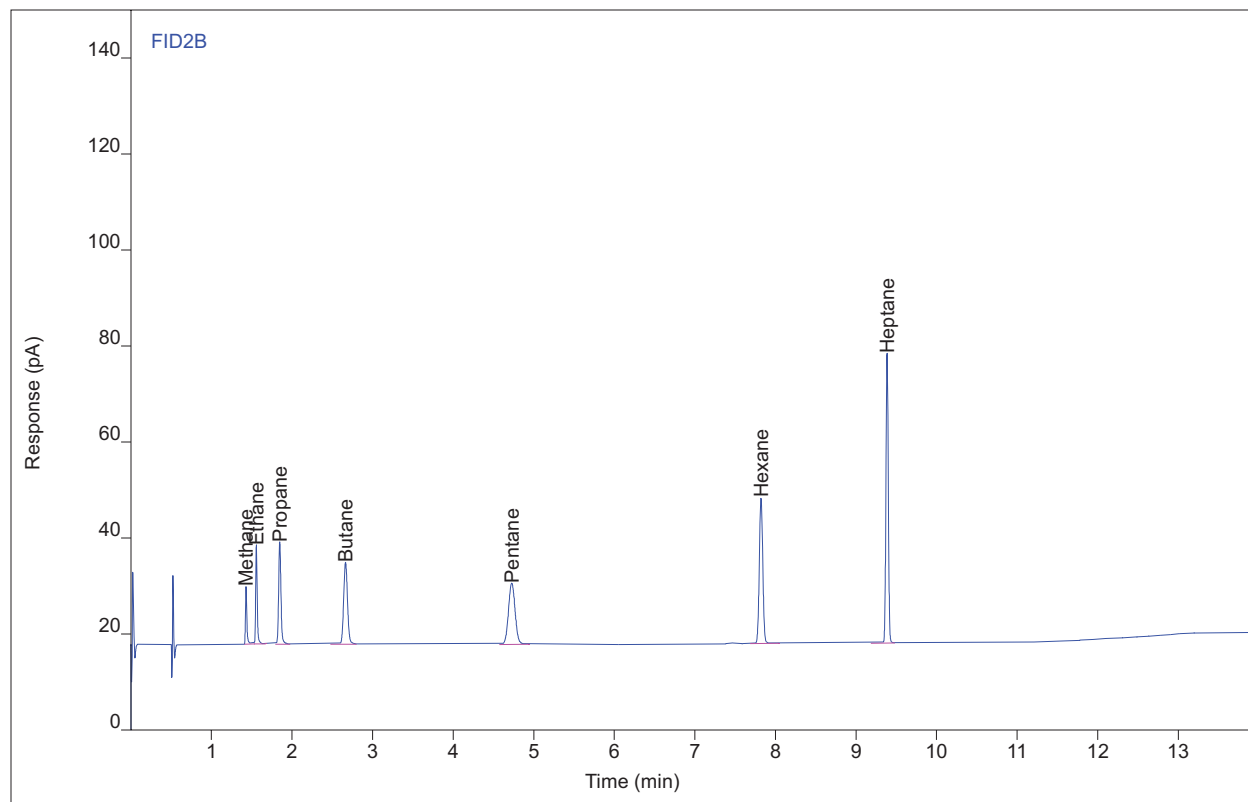
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.43 | 14.6585 | 11.8297 | 41.4267 | 1  | 41.4267 | ppm  |
| Ethane   | VB   | 1.56 | 28.2549 | 20.4514 | 41.2062 | 1  | 41.2062 | ppm  |
| Propane  | BB   | 1.85 | 43.1505 | 21.2846 | 41.6699 | 1  | 41.6699 | ppm  |
| Butane   | BB   | 2.66 | 56.8532 | 17.0466 | 41.0585 | 1  | 41.0585 | ppm  |
| Pentane  | VB   | 4.73 | 73.0329 | 12.8144 | 41.2309 | 1  | 41.2309 | ppm  |
| Hexane   | BB   | 7.82 | 91.4246 | 30.7716 | 41.3740 | 1  | 41.3740 | ppm  |
| Heptane  | BV   | 9.39 | 122.765 | 59.1071 | 41.2570 | 1  | 41.2570 | ppm  |

# Chromatogram Report

# Enthalpy Analytical

Sample Name ROSIEP082 #C4 ENV(1=424,4=400)  
Sequence Name ROSIEP084 ver.2  
Inj Data File 026B1003.D  
File Location GC/2018/Rosie/Quarter 1  
Injection Date 11/13/2018 10:16 AM  
File Modified 11/27/2018 10:53 AM  
Instrument  
Operator Jennie Parrish

Sample Type  
Vial Number  
Injection Volume  
Injection  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 11/14/2018 8:03 AM  
Printed 11/27/2018 11:01 AM



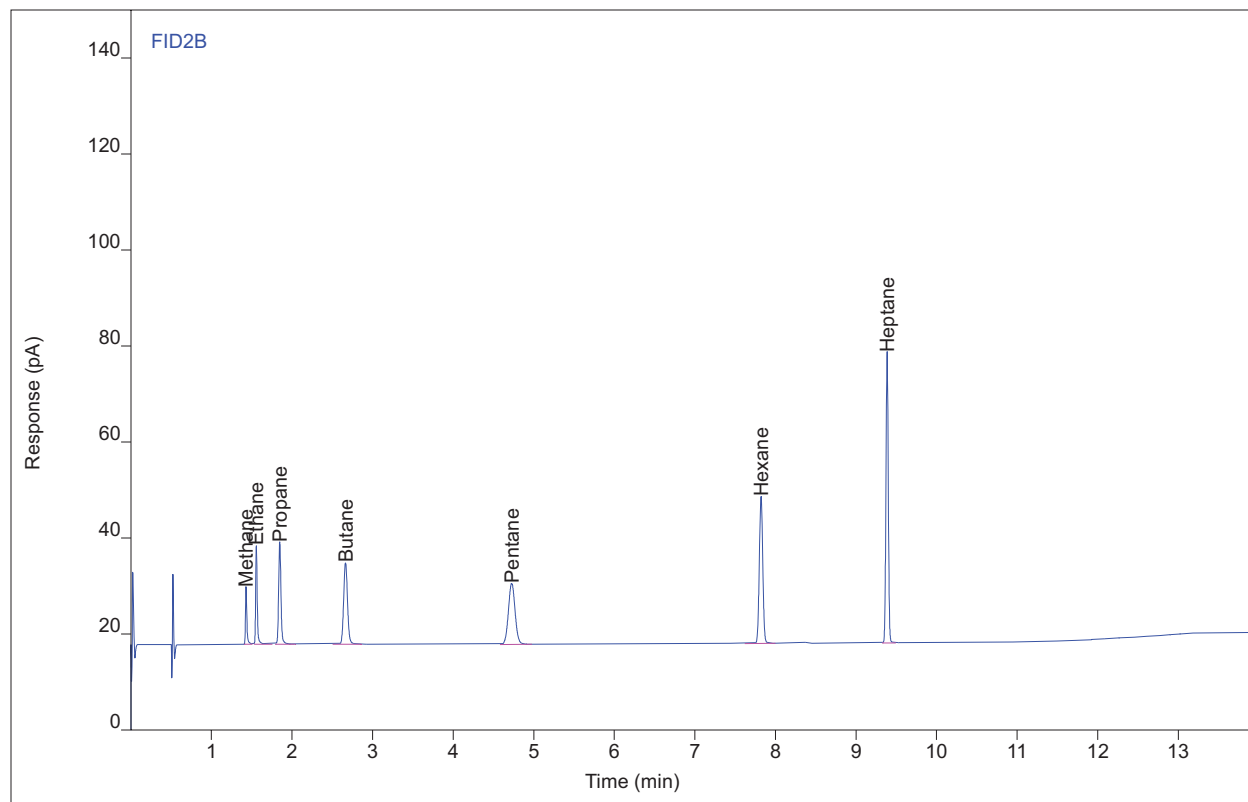
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.43 | 14.5349 | 11.9417 | 41.0772 | 1  | 41.0772 | ppm  |
| Ethane   | VB   | 1.56 | 27.9790 | 20.4552 | 40.8035 | 1  | 40.8035 | ppm  |
| Propane  | BV   | 1.85 | 42.7910 | 21.3216 | 41.3207 | 1  | 41.3207 | ppm  |
| Butane   | BV   | 2.66 | 56.8867 | 17.0754 | 41.0829 | 1  | 41.0829 | ppm  |
| Pentane  | VB   | 4.73 | 72.9691 | 12.7965 | 41.1946 | 1  | 41.1946 | ppm  |
| Hexane   | VB   | 7.82 | 92.1227 | 30.4459 | 41.6919 | 1  | 41.6919 | ppm  |
| Heptane  | VB   | 9.39 | 123.072 | 60.3312 | 41.3610 | 1  | 41.3610 | ppm  |

# Chromatogram Report

# Enthalpy Analytical

Sample Name ROSIEP082 #C4 ENV(1=424,4=400)  
Sequence Name ROSIEP084 ver.2  
Inj Data File 026B1004.D  
File Location GC/2018/Rosie/Quarter 1  
Injection Date 11/13/2018 10:40 AM  
File Modified 11/27/2018 10:53 AM  
Instrument  
Operator Jennie Parrish

Sample Type  
Vial Number Vial 26  
Injection Volume NA  
Injection 4 of 4  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 11/14/2018 8:03 AM  
Printed 11/27/2018 11:01 AM



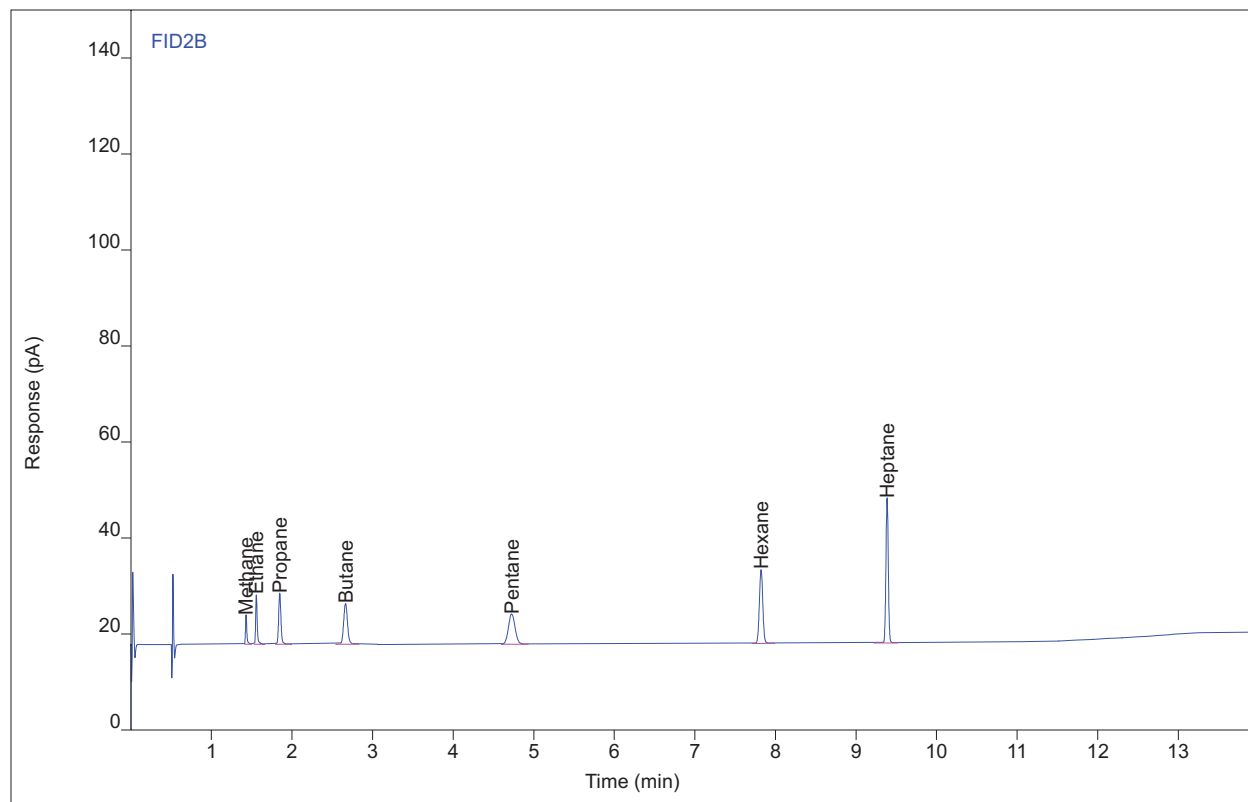
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.43 | 14.6422 | 11.9358 | 41.3806 | 1  | 41.3806 | ppm  |
| Ethane   | BB   | 1.56 | 28.5111 | 20.4968 | 41.5803 | 1  | 41.5803 | ppm  |
| Propane  | BB   | 1.85 | 42.9520 | 21.3178 | 41.4771 | 1  | 41.4771 | ppm  |
| Butane   | VB   | 2.66 | 56.8984 | 17.0630 | 41.0913 | 1  | 41.0913 | ppm  |
| Pentane  | VB   | 4.73 | 73.5761 | 12.8171 | 41.5400 | 1  | 41.5400 | ppm  |
| Hexane   | BB   | 7.82 | 91.9212 | 30.6665 | 41.6001 | 1  | 41.6001 | ppm  |
| Heptane  | VB   | 9.39 | 122.843 | 60.3471 | 41.2836 | 1  | 41.2836 | ppm  |

# Chromatogram Report

# Enthalpy Analytical

Sample Name ROSIEP082 #C3 ENV(1=565.33,4=200)  
Sequence Name ROSIEP084 ver.2  
Inj Data File 026B1102.D  
File Location GC/2018/Rosie/Quarter 1  
Injection Date 11/13/2018 11:30 AM  
File Modified 11/27/2018 10:53 AM  
Instrument  
Operator Jennie Parrish

Sample Type  
Vial Number  
Injection Volume  
Injection 2 of 4  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 11/14/2018 8:03 AM  
Printed 11/27/2018 11:01 AM



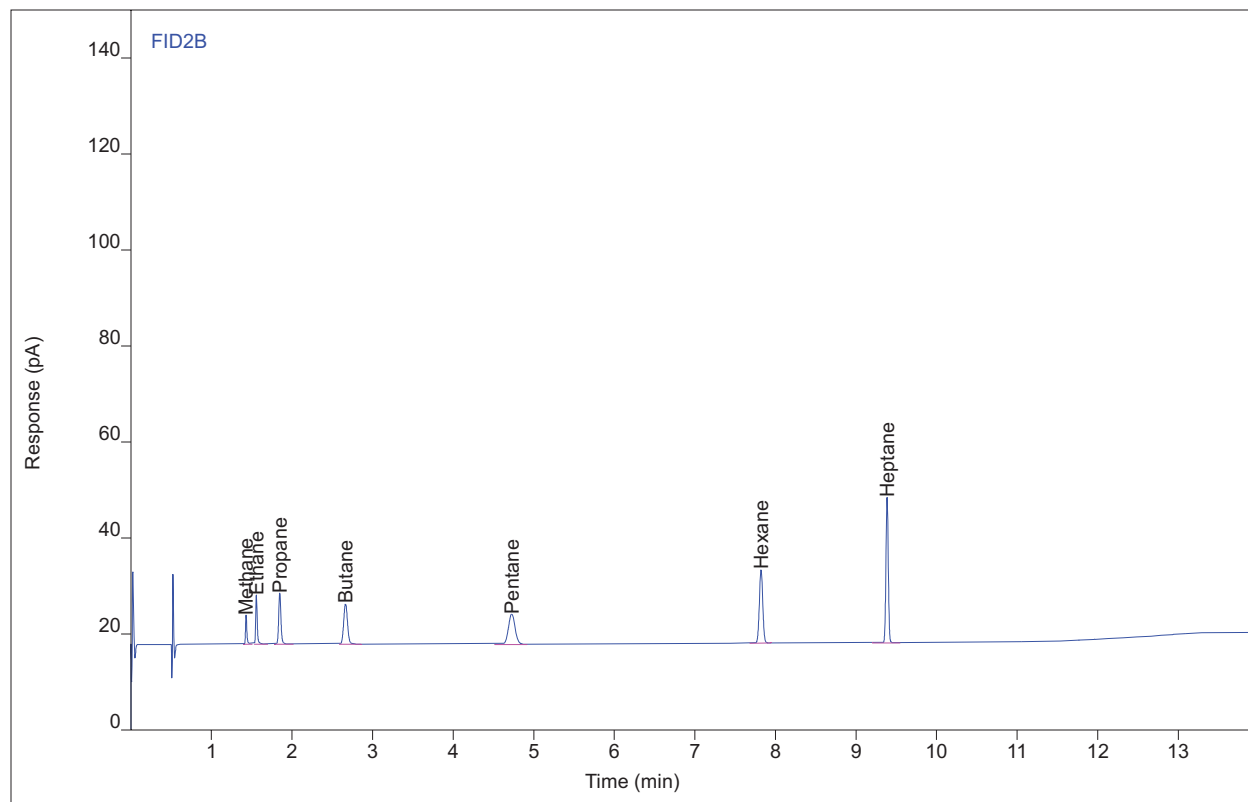
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.43 | 7.13819 | 6.02462 | 20.1662 | 1  | 20.1662 | ppm  |
| Ethane   | BB   | 1.56 | 13.8926 | 10.2509 | 20.2375 | 1  | 20.2375 | ppm  |
| Propane  | BB   | 1.85 | 21.2701 | 10.6660 | 20.4126 | 1  | 20.4126 | ppm  |
| Butane   | BB   | 2.66 | 28.3705 | 8.51824 | 20.3730 | 1  | 20.3730 | ppm  |
| Pentane  | BB   | 4.73 | 36.3249 | 6.37608 | 20.3443 | 1  | 20.3443 | ppm  |
| Hexane   | VB   | 7.82 | 45.8091 | 15.4109 | 20.6034 | 1  | 20.6034 | ppm  |
| Heptane  | BB   | 9.39 | 62.0428 | 30.0893 | 20.6956 | 1  | 20.6956 | ppm  |

# Chromatogram Report

# Enthalpy Analytical

Sample Name ROSIEP082 #C3 ENV(1=565.33,4=200)  
Sequence Name ROSIEP084 ver.2  
Inj Data File 026B1103.D  
File Location GC/2018/Rosie/Quarter 1  
Injection Date 11/13/2018 11:54 AM  
File Modified 11/27/2018 10:53 AM  
Instrument  
Operator Jennie Parrish

Sample Type  
Vial Number Vial 26  
Injection Volume NA  
Injection 3 of 4  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 11/14/2018 8:03 AM  
Printed 11/27/2018 11:01 AM



| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.43 | 7.26946 | 6.00915 | 20.5373 | 1  | 20.5373 | ppm  |
| Ethane   | BB   | 1.56 | 14.0987 | 10.2966 | 20.5384 | 1  | 20.5384 | ppm  |
| Propane  | BB   | 1.85 | 21.3746 | 10.6937 | 20.5141 | 1  | 20.5141 | ppm  |
| Butane   | BB   | 2.66 | 28.4466 | 8.51116 | 20.4284 | 1  | 20.4284 | ppm  |
| Pentane  | BV   | 4.73 | 36.7338 | 6.37650 | 20.5770 | 1  | 20.5770 | ppm  |
| Hexane   | BB   | 7.82 | 45.5395 | 15.4286 | 20.4806 | 1  | 20.4806 | ppm  |
| Heptane  | BB   | 9.39 | 61.7406 | 30.2741 | 20.5932 | 1  | 20.5932 | ppm  |

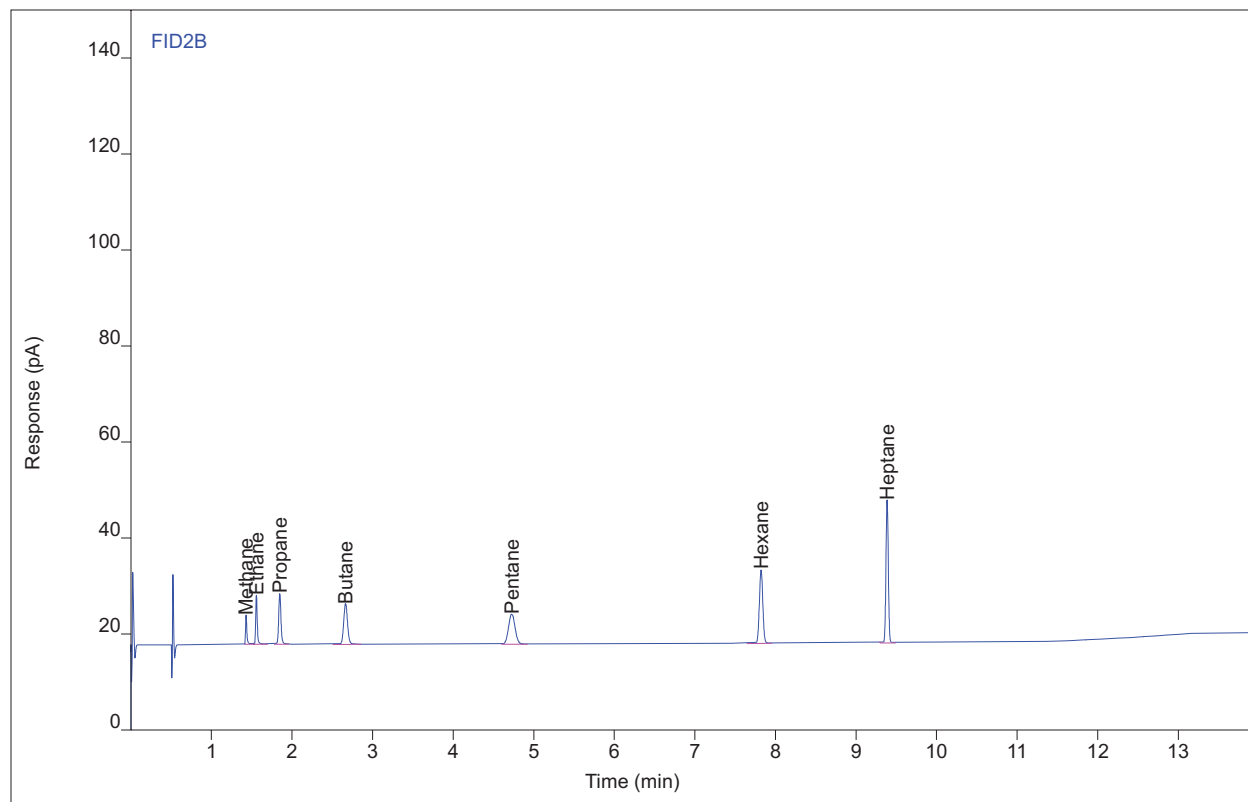


# Chromatogram Report

# Enthalpy Analytical

Sample Name ROSIEP082 #C3 ENV(1=565.33,4=200)  
Sequence Name ROSIEP084 ver.2  
Inj Data File 026B1104.D  
File Location GC/2018/Rosie/Quarter 1  
Injection Date 11/13/2018 12:19 PM  
File Modified 11/27/2018 10:53 AM  
Instrument  
Operator Jennie Parrish

Sample Type  
Vial Number  
Injection Volume  
Injection 4 of 4  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 11/14/2018 8:03 AM  
Printed 11/27/2018 11:01 AM



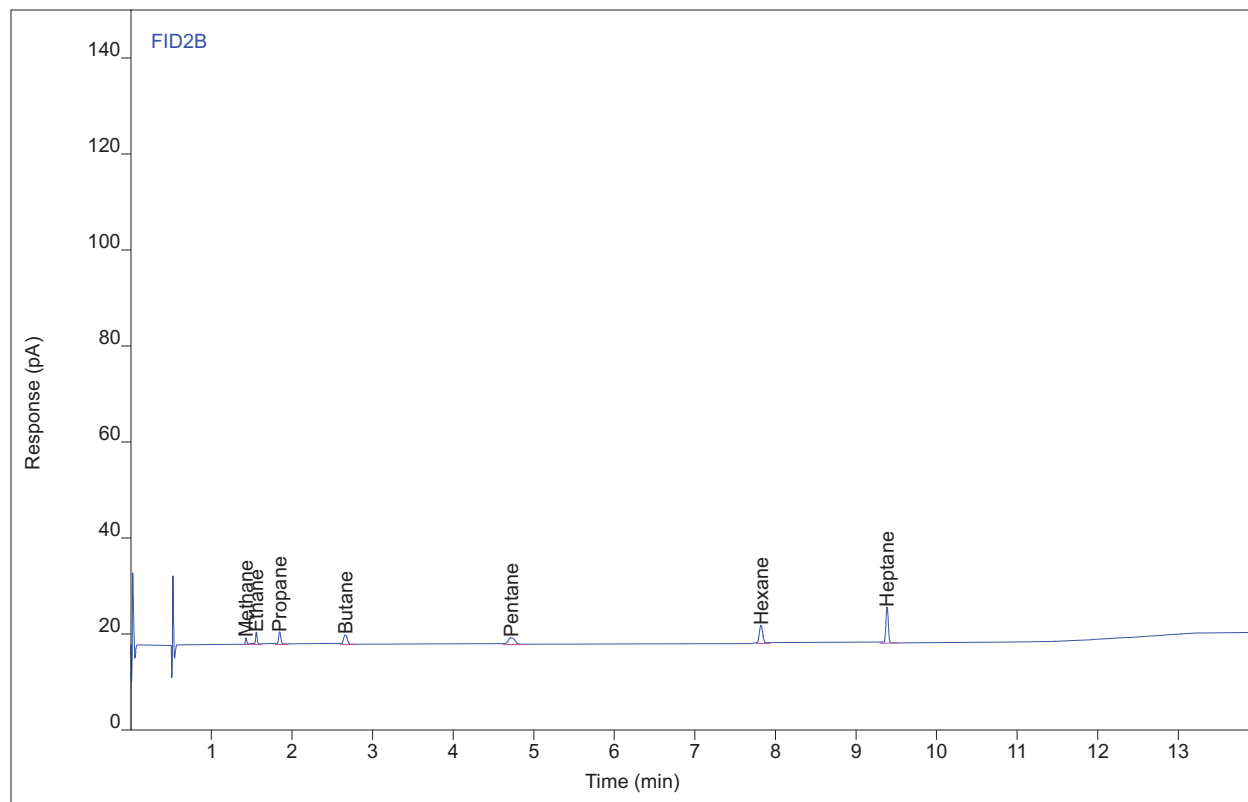
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BV   | 1.43 | 7.27366 | 5.94380 | 20.5491 | 1  | 20.5491 | ppm  |
| Ethane   | VB   | 1.56 | 14.0653 | 10.2404 | 20.4896 | 1  | 20.4896 | ppm  |
| Propane  | BB   | 1.85 | 21.1351 | 10.6369 | 20.2814 | 1  | 20.2814 | ppm  |
| Butane   | VB   | 2.66 | 28.3127 | 8.50836 | 20.3311 | 1  | 20.3311 | ppm  |
| Pentane  | BV   | 4.73 | 36.3931 | 6.39648 | 20.3831 | 1  | 20.3831 | ppm  |
| Hexane   | VB   | 7.82 | 45.7321 | 15.4246 | 20.5683 | 1  | 20.5683 | ppm  |
| Heptane  | BV   | 9.39 | 61.3840 | 29.8497 | 20.4725 | 1  | 20.4725 | ppm  |

# Chromatogram Report

# Enthalpy Analytical

Sample Name ROSIEP082 #C2 ENV(1=2685.32,4=200)  
Sequence Name ROSIEP084 ver.2  
Inj Data File 026B1202.D  
File Location GC/2018/Rosie/Quarter 1  
Injection Date 11/13/2018 1:08 PM  
File Modified 11/27/2018 10:53 AM  
Instrument  
Operator Jennie Parrish

Sample Type  
Vial Number Vial 26  
Injection Volume NA  
Injection 2 of 4  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 11/14/2018 8:03 AM  
Printed 11/27/2018 11:01 AM



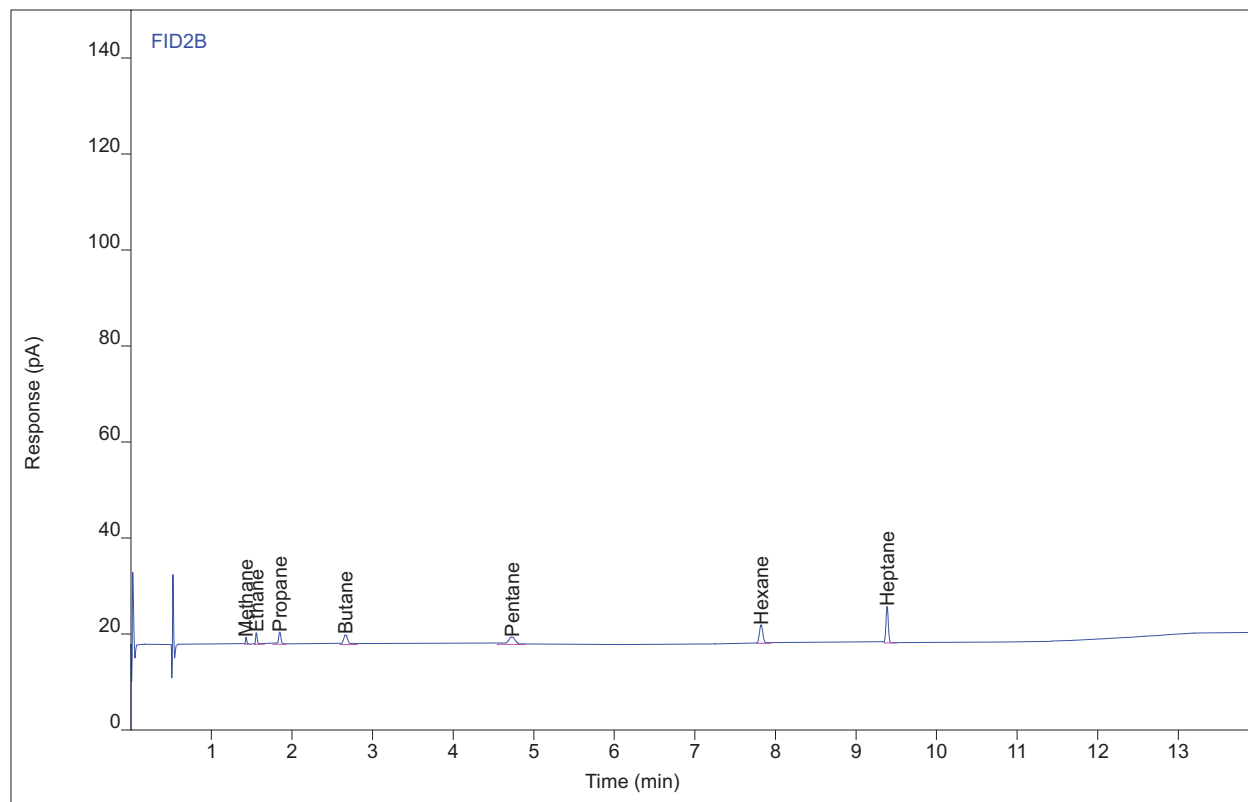
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.43 | 1.71699 | 1.49252 | 4.84048 | 1  | 4.84048 | ppm  |
| Ethane   | BB   | 1.56 | 3.42487 | 2.55082 | 4.95515 | 1  | 4.95515 | ppm  |
| Propane  | BV   | 1.85 | 5.37806 | 2.66524 | 4.97442 | 1  | 4.97442 | ppm  |
| Butane   | BB   | 2.66 | 7.08012 | 2.16606 | 4.91495 | 1  | 4.91495 | ppm  |
| Pentane  | BV   | 4.72 | 9.28425 | 1.62423 | 4.96096 | 1  | 4.96096 | ppm  |
| Hexane   | BB   | 7.82 | 11.3842 | 3.80375 | 4.93178 | 1  | 4.93178 | ppm  |
| Heptane  | BB   | 9.39 | 15.5713 | 7.54648 | 4.96195 | 1  | 4.96195 | ppm  |

# Chromatogram Report

# Enthalpy Analytical

Sample Name ROSIEP082 #C2 ENV(1=2685.32,4=200)  
Sequence Name ROSIEP084 ver.2  
Inj Data File 026B1203.D  
File Location GC/2018/Rosie/Quarter 1  
Injection Date 11/13/2018 1:33 PM  
File Modified 11/27/2018 10:53 AM  
Instrument  
Operator Jennie Parrish

Sample Type  
Vial Number Vial 26  
Injection Volume NA  
Injection 3 of 4  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 11/14/2018 8:03 AM  
Printed 11/27/2018 11:01 AM



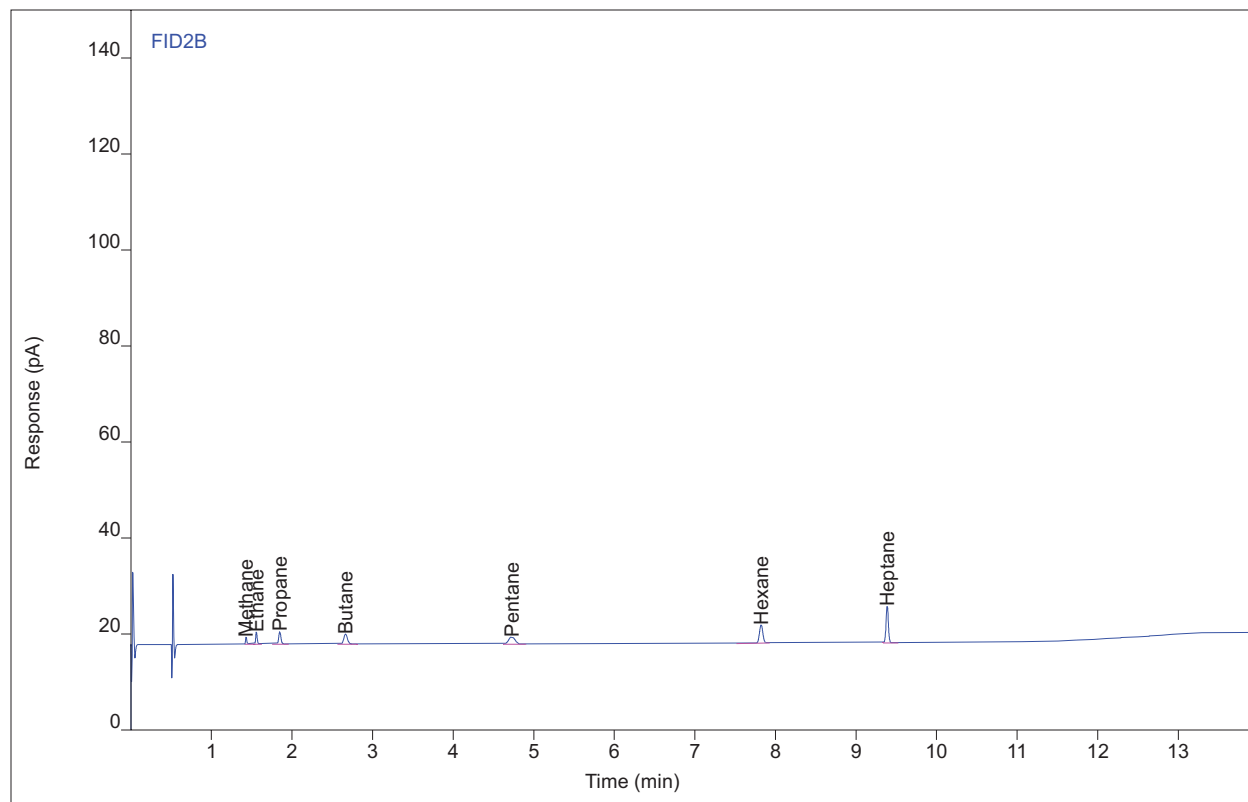
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.43 | 1.75824 | 1.49851 | 4.95678 | 1  | 4.95678 | ppm  |
| Ethane   | BB   | 1.56 | 3.39306 | 2.52292 | 4.90913 | 1  | 4.90913 | ppm  |
| Propane  | BB   | 1.85 | 5.30697 | 2.67176 | 4.90867 | 1  | 4.90867 | ppm  |
| Butane   | BB   | 2.66 | 7.26584 | 2.13648 | 5.04590 | 1  | 5.04590 | ppm  |
| Pentane  | BB   | 4.73 | 9.32038 | 1.62147 | 4.98027 | 1  | 4.98027 | ppm  |
| Hexane   | BB   | 7.82 | 11.4795 | 3.85250 | 4.97306 | 1  | 4.97306 | ppm  |
| Heptane  | BB   | 9.39 | 15.5537 | 7.61731 | 4.95635 | 1  | 4.95635 | ppm  |

# Chromatogram Report

# Enthalpy Analytical

Sample Name ROSIEP082 #C2 ENV(1=2685.32,4=200)  
Sequence Name ROSIEP084 ver.2  
Inj Data File 026B1204.D  
File Location GC/2018/Rosie/Quarter 1  
Injection Date 11/13/2018 1:57 PM  
File Modified 11/27/2018 10:53 AM  
Instrument  
Operator Jennie Parrish

Sample Type  
Vial Number Vial 26  
Injection Volume NA  
Injection 4 of 4  
Acquisition Method AQM\_ROSIEP080.M  
Analysis Method ROSIEP082\_C1-C7.M  
Method Modified 11/14/2018 8:03 AM  
Printed 11/27/2018 11:01 AM



| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | BB   | 1.43 | 1.79927 | 1.50518 | 5.07264 | 1  | 5.07264 | ppm  |
| Ethane   | BB   | 1.56 | 3.47199 | 2.58465 | 5.02354 | 1  | 5.02354 | ppm  |
| Propane  | BV   | 1.85 | 5.40355 | 2.66159 | 4.99800 | 1  | 4.99800 | ppm  |
| Butane   | VB   | 2.67 | 7.12971 | 2.14548 | 4.94937 | 1  | 4.94937 | ppm  |
| Pentane  | BB   | 4.73 | 9.25463 | 1.61267 | 4.94514 | 1  | 4.94514 | ppm  |
| Hexane   | VB   | 7.82 | 11.4236 | 3.84068 | 4.94885 | 1  | 4.94885 | ppm  |
| Heptane  | BB   | 9.39 | 15.5596 | 7.62864 | 4.95823 | 1  | 4.95823 | ppm  |

## CERTIFICATE OF ANALYSIS

### Grade of Product: CERTIFIED STANDARD-SPEC

|                  |                           |                    |                 |
|------------------|---------------------------|--------------------|-----------------|
| Part Number:     | X08NI99C15A0079           | Reference Number:  | 141-124578026-1 |
| Cylinder Number: | CC72412                   | Cylinder Volume:   | 144.4 CF        |
| Laboratory:      | 124 - Conley Stryker - OH | Cylinder Pressure: | 2015 PSIG       |
| Analysis Date:   | Sep 19, 2016              | Valve Outlet:      | 350             |
| Lot Number:      | 141-124578026-1           |                    |                 |

**Expiration Date: Sep 19, 2019**

Product composition verified by direct comparison to calibration standards traceable to N.I.S.T. weights and/or N.I.S.T. Gas Mixture reference materials.

### ANALYTICAL RESULTS

| Component | Req Conc  | Actual Concentration<br>(Mole %) | Analytical<br>Uncertainty |
|-----------|-----------|----------------------------------|---------------------------|
| ETHANE    | 100.0 PPM | 100.0 PPM                        | +/- 2%                    |
| HEXANE    | 100.0 PPM | 100.0 PPM                        | +/- 2%                    |
| METHANE   | 100.0 PPM | 100.0 PPM                        | +/- 2%                    |
| N BUTANE  | 100.0 PPM | 100.0 PPM                        | +/- 2%                    |
| N HEPTANE | 100.0 PPM | 100.0 PPM                        | +/- 2%                    |
| N PENTANE | 100.0 PPM | 100.0 PPM                        | +/- 2%                    |
| PROPANE   | 100.0 PPM | 100.0 PPM                        | +/- 2%                    |
| NITROGEN  | Balance   |                                  |                           |



Approved for Release

# CERTIFICATE OF ANALYSIS

## Grade of Product: CERTIFIED HYDROCARBON

Customer: MONTROSE ENVIRONMENTAL GROUP  
Part Number: X08NI83C15AC015  
Cylinder Number: SG9164133BAL  
Laboratory: 124 - LaPorte Mix (SAP) - TX  
Analysis Date: Jul 14, 2016  
Lot Number: 126-400739490-1

Reference Number: 126-400739490-1  
Cylinder Volume: 15.8 CF  
Cylinder Pressure: 204 PSIG  
Valve Outlet: 350  
Expiration Date: Jul 14, 2019

Traceability Statement: Hydrocarbon Process standards are NIST traceable either directly by weight or by comparison to Airgas laboratory standards that are directly NIST traceable by weight.

### CERTIFIED CONCENTRATIONS

| Component | Requested Concentration | Reported Mole % | Accuracy |
|-----------|-------------------------|-----------------|----------|
| N-HEPTANE | 250.0 PPM               | 251.2 PPM       | +/- 2%   |
| HEXANE    | 0.4000 %                | 0.4001 %        | +/- 2%   |
| N-PENTANE | 0.5000 %                | 0.4995 %        | +/- 2%   |
| N-BUTANE  | 1.000 %                 | 0.9991 %        | +/- 2%   |
| ETHANE    | 5.000 %                 | 4.995 %         | +/- 2%   |
| METHANE   | 5.000 %                 | 4.992 %         | +/- 2%   |
| PROPANE   | 5.000 %                 | 4.997 %         | +/- 2%   |
| NITROGEN  | Balance                 | Balance         |          |

#### Notes:

PO# 06201603

Signature on file

Approved for Release

Page 1 of 126-400739490-1

### Method Information

Method: C:\GC\ROSIE\2018\METHODS\AQM\_ROSIEP080.M  
Modified: 11/6/2018 at 9:32:59 AM

### Method Audit Trail

Operator : Justin Guenzler  
Date : 11/6/2018 9:32:58 AM  
Change Info: This method was created at 11/6/2018 9:32:58 AM and based on  
method C:\GC\ROSIE\2018\METHODS\ROSIEP001\_CAL.M

Operator : Justin Guenzler  
Date : 11/6/2018 9:32:59 AM  
Change Info: Method saved. User comment: ""

### Run Time Checklist

Pre-Run Cmd/Macro: on  
Name: VC\_ENV

Data Acquisition: on

Standard Data Analysis: on

Customized Data Analysis: off

Save GLP Data: off

Post-Run Cmd/Macro: off

Save Method with Data: off

### Injection Source and Location

Injection Source: 6890 GC Valve

Injection Location: Dual

=====

6890 GC METHOD

=====

### OVEN

|               |            |                     |            |
|---------------|------------|---------------------|------------|
| Initial temp: | 40 'C (On) | Maximum temp:       | 260 'C     |
| Initial time: | 6.00 min   | Equilibration time: | 1.50 min   |
| Ramps:        |            |                     |            |
| #             | Rate       | Final temp          | Final time |
| 1             | 30.00      | 220                 | 2.00       |
| 2             | 0.0 (Off)  |                     |            |
| Post temp:    | 40 'C      |                     |            |
| Post time:    | 0.00 min   |                     |            |
| Run time:     | 14.00 min  |                     |            |

FRONT INLET (SPLIT/SPLITLESS)

BACK INLET (SPLIT/SPLITLESS)

Modified on: 11/6/2018 at 9:32:59 AM

Mode: Splitless  
Initial temp: 200 'C (On)  
Pressure: 60.00 psi (On)  
Purge flow: 0.0 mL/min  
Purge time: 0.00 min  
Total flow: 12.3 mL/min  
Gas saver: Off  
Gas type: Helium

Mode: Split  
Initial temp: 200 'C (On)  
Pressure: 11.99 psi (On)  
Split ratio: 5:1  
Split flow: 12.8 mL/min  
Total flow: 18.5 mL/min  
Gas saver: Off  
Gas type: Helium

#### COLUMN 1

Packed Column  
Model Number: Restek Shincarbon  
2x 2mx1/16inch  
Max temperature: 280 'C  
Mode: constant pressure  
Pressure: 60.00 psi  
Inlet: Front Inlet  
Outlet: Front Detector  
Outlet pressure: ambient

#### COLUMN 2

Capillary Column  
Model Number: Restek 10198  
RTX-1 s/n - 1452469  
Max temperature: 300 'C  
Nominal length: 30.0 m  
Nominal diameter: 320.00 um  
Nominal film thickness: 4.00 um  
Mode: constant flow  
Initial flow: 2.6 mL/min  
Nominal init pressure: 12.00 psi  
Average velocity: 41 cm/sec  
Inlet: Back Inlet  
Outlet: Back Detector  
Outlet pressure: ambient

#### FRONT DETECTOR (TCD)

Temperature: 275 'C (On)  
Reference flow: On  
Makeup flow: On  
Makeup Gas Type: Helium  
Filament: On  
Negative polarity: On

#### BACK DETECTOR (FID)

Temperature: 250 'C (On)  
Hydrogen flow: 60.0 mL/min (On)  
Air flow: 450.0 mL/min (On)  
Mode: Constant makeup flow  
Makeup flow: 40.0 mL/min (On)  
Makeup Gas Type: Helium  
Flame: On  
Electrometer: On  
Lit offset: 2.0

#### SIGNAL 1

Data rate: 20 Hz  
Type: front detector  
Save Data: On  
Zero: 0.0 (Off)  
Range: 0  
Fast Peaks: Off  
Attenuation: 0

#### SIGNAL 2

Data rate: 20 Hz  
Type: back detector  
Save Data: On  
Zero: 0.0 (Off)  
Range: 0  
Fast Peaks: Off  
Attenuation: 0

#### COLUMN COMP 1

Derive from front detector

#### COLUMN COMP 2

Derive from front detector

#### THERMAL AUX 1

Use: Valve Box Heater  
Description:  
Initial temp: 130 'C (On)  
Initial time: 11.00 min  
# Rate Final temp Final time  
1 0.0(Off)

#### VALVES

Valve 1 Gas Sampling  
Description:  
Loop Volume: 0.250 mL  
Load Time: 0.10 min  
Inject Time: 0.50 min  
Inlet: Front Inlet  
Valve 2 Gas Sampling  
Description:

#### POST RUN

Post Time: 0.00 min



Modified on: 11/6/2018 at 9:32:59 AM

Loop Volume: 0.250 mL

Load Time: 0.10 min

Inject Time: 0.50 min

Inlet: Back Inlet

TIME TABLE

| Time | Specifier | Parameter & Setpoint     |     |
|------|-----------|--------------------------|-----|
| 3.00 |           | Front Detector Polarity: | Off |

**This Is The Last Page  
Of This Report.**



**APPENDIX II-E**  
**Calibration Gas Cylinder Certification Sheets**

# CERTIFICATE OF ANALYSIS

## Grade of Product: EPA Protocol

|                  |                         |                     |                 |
|------------------|-------------------------|---------------------|-----------------|
| Part Number:     | E03NI79E15A0088         | Reference Number:   | 122-401268406-1 |
| Cylinder Number: | EB0066823               | Cylinder Volume:    | 151.0 CF        |
| Laboratory:      | 124 - Durham (SAP) - NC | Cylinder Pressure:  | 2015 PSIG       |
| PGVP Number:     | B22018                  | Valve Outlet:       | 590             |
| Gas Code:        | CO2,O2,BALN             | Certification Date: | Aug 06, 2018    |

**Expiration Date: Aug 06, 2026**

Certification performed in accordance with "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (May 2012)" document EPA 600/R-12/531, using the assay procedures listed. Analytical Methodology does not require correction for analytical interference. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a volume/volume basis unless otherwise noted.

Do Not Use This Cylinder below 100 psig, i.e. 0.7 megapascals.

### ANALYTICAL RESULTS

| Component      | Requested Concentration | Actual Concentration | Protocol Method | Total Relative Uncertainty | Assay Dates |
|----------------|-------------------------|----------------------|-----------------|----------------------------|-------------|
| CARBON DIOXIDE | 10.00 %                 | 9.952 %              | G1              | +/- 0.6% NIST Traceable    | 08/06/2018  |
| OXYGEN         | 11.00 %                 | 11.05 %              | G1              | +/- 0.4% NIST Traceable    | 08/06/2018  |
| NITROGEN       | Balance                 |                      |                 |                            |             |

### CALIBRATION STANDARDS

| Type | Lot ID   | Cylinder No | Concentration                    | Uncertainty | Expiration Date |
|------|----------|-------------|----------------------------------|-------------|-----------------|
| NTRM | 13060638 | CC414571    | 13.359 % CARBON DIOXIDE/NITROGEN | +/- 0.6%    | May 09, 2019    |
| NTRM | 09060212 | CC262381    | 9.961 % OXYGEN/NITROGEN          | +/- 0.3%    | Nov 08, 2018    |

### ANALYTICAL EQUIPMENT

| Instrument/Make/Model        | Analytical Principle          | Last Multipoint Calibration |
|------------------------------|-------------------------------|-----------------------------|
| Horiba VIA510 CO2 2L6YXWY0   | Nondispersive Infrared (NDIR) | Jul 25, 2018                |
| Horiba MPA510 O2 41499150042 | Paramagnetic                  | Jul 25, 2018                |

Triad Data Available Upon Request



*CS Williams*

Approved for Release



# CERTIFICATE OF ANALYSIS

## Grade of Product: EPA Protocol

Part Number: E03NI59E15A0014  
Cylinder Number: EB0107294  
Laboratory: 124 - Durham (SAP) - NC  
PGVP Number: B22018

Reference Number: 122-401123521-1  
Cylinder Volume: 158.6 CF  
Cylinder Pressure: 2015 PSIG  
Valve Outlet: 590  
Certification Date: Feb 12, 2018

**Expiration Date: Feb 12, 2026**

Certification performed in accordance with "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (May 2012)" document EPA 600/R-12/531, using the assay procedures listed. Analytical Methodology does not require correction for analytical interference. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a volume/volume basis unless otherwise noted.

Do Not Use This Cylinder below 100 psig, i.e. 0.7 megapascals.

### ANALYTICAL RESULTS

| Component      | Requested Concentration | Actual Concentration | Protocol Method | Total Relative Uncertainty | Assay Dates |
|----------------|-------------------------|----------------------|-----------------|----------------------------|-------------|
| CARBON DIOXIDE | 18.50 %                 | 18.22 %              | G1              | +/- 0.6% NIST Traceable    | 02/12/2018  |
| OXYGEN         | 22.00 %                 | 21.99 %              | G1              | +/- 0.3% NIST Traceable    | 02/12/2018  |
| NITROGEN       | Balance                 |                      |                 |                            |             |

### CALIBRATION STANDARDS

| Type | Lot ID   | Cylinder No | Concentration                   | Uncertainty | Expiration Date |
|------|----------|-------------|---------------------------------|-------------|-----------------|
| NTRM | 12061508 | CC354696    | 19.87 % CARBON DIOXIDE/NITROGEN | +/- 0.6%    | Jan 11, 2024    |
| NTRM | 12062009 | CC367498    | 22.883 % OXYGEN/NITROGEN        | +/- 0.2%    | Apr 24, 2018    |

### ANALYTICAL EQUIPMENT

| Instrument/Make/Model        | Analytical Principle          | Last Multipoint Calibration |
|------------------------------|-------------------------------|-----------------------------|
| Horiba VIA510 CO2 2L6YXWY0   | Nondispersive Infrared (NDIR) | Feb 07, 2018                |
| Horiba MPA510 O2 41499150042 | Paramagnetic                  | Feb 07, 2018                |

Triad Data Available Upon Request



*CS D. H. H. H.*

Approved for Release



Praxair Distribution Mid-Atlantic  
One Steel Road East,  
Morrisville, PA 19067  
Tel: (800) 638-6360 Fax: (215) 736 5240  
PGVP ID: F32017

DocNumber: 000021313

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

### Customer & Order Information:

CHEROKEE INSTRUMENTS INC  
100 LOGAN COURT  
ANGIER NC 27501

Praxair Order Number: 92286180  
Customer P. O. Number: 0050001228  
Customer Reference Number:

Fill Date: 6/10/2017  
Part Number: NI CO225E-AS  
Lot Number: 304613161708  
Cylinder Style & Outlet: AS CGA 660  
Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

### Certified Concentration:

|                  |                 |                         |
|------------------|-----------------|-------------------------|
| Expiration Date: | 6/14/2025       | NIST Traceable          |
| Cylinder Number: | CC120837        | Analytical Uncertainty: |
| 226.4 ppm        | CARBON MONOXIDE | ± 0.5 %                 |
| Balance          | NITROGEN        |                         |

Certification Information: Certification Date: 6/14/2017 Term: 96 Months Expiration Date: 6/14/2025

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Do Not Use this Standard if Pressure is less than 100 PSIG.

### Analytical Data: (R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

#### 1. Component: CARBON MONOXIDE

Requested Concentration: 225 ppm  
Certified Concentration: 226.4 ppm  
Instrument Used: HORIBA VIA-3000 S/N Y9EY78L6  
Analytical Method: NDIR  
Last Multipoint Calibration: 5/31/2017

| First Analysis Data: |                  | Date:     | 6/14/2017   |
|----------------------|------------------|-----------|-------------|
| Z: 0                 | R: 303           | C: 226.3  | Conc: 226.5 |
| R: 302.6             | Z: 0             | C: 226.2  | Conc: 226.4 |
| Z: 0                 | C: 226.2         | R: 302.6  | Conc: 226.4 |
| UOM: PPM             | Mean Test Assay: | 226.4 PPM |             |

Analyzed by:

Megha Patel

Reference Standard Type: GMIS  
Ref Std. Cylinder #: CC308682  
Ref Std. Conc: 303 PPM  
Ref Std. Traceable to SRM #: 1680b  
SRM Sample #: 2-J-49  
SRM Cylinder #: CAL018038

| Second Analysis Data: |                  | Date: |         |
|-----------------------|------------------|-------|---------|
| Z: 0                  | R: 0             | C: 0  | Conc: 0 |
| R: 0                  | Z: 0             | C: 0  | Conc: 0 |
| Z: 0                  | C: 0             | R: 0  | Conc: 0 |
| UOM: PPM              | Mean Test Assay: | 0 PPM |         |

Certified by:

Jessica Goodman

Information contained herein has been prepared at your request by qualified experts within Praxair Distribution, Inc. While we believe that the information is accurate within the limits of the analytical methods employed and is complete to the extent of the specific analyses performed, we make no warranty or representation as to the suitability of the use of the information for any purpose. The information is offered with the understanding that any use of the information is at the sole discretion and risk of the user. In no event shall the liability of Praxair Distribution, Inc., arising out of the use of the information contained herein exceed the fee established for providing such information.



DocNumber: 000022170

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

**Customer & Order Information:**

CHEROKEE INSTRUMENTS INC  
100 LOGAN COURT  
ANGIER NC 27501

Praxair Order Number: 41969933  
Customer P. O. Number: 0050001358  
Customer Reference Number:

Fill Date: 9/6/2017  
Part Number: NI CO125E-AS  
Lot Number: 304613249708  
Cylinder Style & Outlet: AS CGA 350  
Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

**Certified Concentration:**

|                  |                 |                         |
|------------------|-----------------|-------------------------|
| Expiration Date: | 9/11/2025       | NIST Traceable          |
| Cylinder Number: | CC247564        | Analytical Uncertainty: |
| 125.6 ppm        | CARBON MONOXIDE | ± 0.3 %                 |
| Balance          | NITROGEN        |                         |

**Certification Information:** Certification Date: 9/11/2017 Term: 96 Months Expiration Date: 9/11/2025

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-800/R-12/531, using Procedure G1. Do Not Use this Standard if Pressure is less than 100 PSIG.

**Analytical Data:**

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

**1. Component: CARBON MONOXIDE**

Requested Concentration: 125 ppm  
Certified Concentration: 125.6 ppm  
Instrument Used: HORIBA VIA-510, S/N 577172041  
Analytical Method: NON-DISPERSIVE INFRARED  
Last Multipoint Calibration: 8/15/2017

|                      |                  |          |             |
|----------------------|------------------|----------|-------------|
| First Analysis Data: |                  | Date:    | 9/11/2017   |
| Z: 0                 | R: 100.5         | C: 125.3 | Conc: 125.1 |
| R: 100.6             | Z: 0             | C: 126.1 | Conc: 125.9 |
| Z: 0                 | C: 125.9         | R: 100.8 | Conc: 125.7 |
| UOM: PPM             | Mean Test Assay: |          | 125.6 PPM   |

Analyzed by:

  
Megha Patel

Reference Standard Type: GMS  
Ref. Std. Cylinder #: CC219583  
Ref. Std. Conc: 100.5 PPM  
Ref. Std. Traceable to SRM #: 1679c  
SRM Sample #: 3-K-04  
SRM Cylinder #: FI25419

|                       |                  |       |         |
|-----------------------|------------------|-------|---------|
| Second Analysis Data: |                  | Date: |         |
| Z: 0                  | R: 0             | C: 0  | Conc: 0 |
| R: 0                  | Z: 0             | C: 0  | Conc: 0 |
| Z: 0                  | C: 0             | R: 0  | Conc: 0 |
| UOM: PPM              | Mean Test Assay: |       | 0 PPM   |

Certified by:

  
Jessica Goodman



Praxair Distribution Mid-Atlantic  
One Steel Road East,  
Morrisville, PA 19067  
Tel: (800) 638-6360 Fax: (215) 736 5240  
PGVP ID: F32012

DocNumber: 000005550

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

### Customer & Order Information:

PDI WHSE RALEIGH  
2807 GRESHAM LAKE RD  
RALEIGH NC 27610

Praxair Order Number: 04430644  
Customer P. O. Number: 12395 99  
Customer Reference Number:

Fill Date: 8/9/2013  
Part Number: EV AIPR25.5MEAS  
Lot Number: 302541221301  
Cylinder Style & Outlet: AS CGA 590  
Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

### Certified Concentration:

|                   |           |                         |
|-------------------|-----------|-------------------------|
| Expiration Date:  | 8/16/2021 | NIST Traceable          |
| Cylinder Number:  | CC145705  | Analytical Uncertainty: |
| 25.25 ppm PROPANE | ± 1 %     |                         |
| Balance AIR       |           |                         |

Certification Information: Certification Date: 8/16/2013 Term: 96 Months Expiration Date: 8/16/2021

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Do Not Use this Standard if Pressure is less than 100 PSIG.

### Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

#### 1. Component: PROPANE

Requested Concentration: 25.5 ppm  
Certified Concentration: 25.25 ppm  
Instrument Used: GOW MAC 580  
Analytical Method:  
Last Multipoint Calibration: 8/14/2013

| First Analysis Data: |       |                  |       | Date: | 8/16/2013 |
|----------------------|-------|------------------|-------|-------|-----------|
| Z:                   | 0     | R:               | 20.9  | C:    | 25.5      |
| Conc:                | 25.51 |                  |       |       |           |
| R:                   | 20.82 | Z:               | 0     | C:    | 25.14     |
| Conc:                | 25.15 |                  |       |       |           |
| Z:                   | 0     | C:               | 25.1  | R:    | 21.02     |
| Conc:                | 25.11 |                  |       |       |           |
| UOM:                 | PPM   | Mean Test Assay: | 25.25 | PPM   |           |

Analyzed by:

Jeff Gosner

Reference Standard Type: GMIS  
Ref. Std. Cylinder #: SA7942  
Ref. Std. Conc: 20.92 PPM  
Ref. Std. Traceable to SRM #: 1667b  
SRM Sample #:  
SRM Cylinder #:

| Second Analysis Data: |     |                  |   | Date: |   |
|-----------------------|-----|------------------|---|-------|---|
| Z:                    | 0   | R:               | 0 | C:    | 0 |
| Conc:                 | 0   |                  |   |       |   |
| R:                    | 0   | Z:               | 0 | C:    | 0 |
| Conc:                 | 0   |                  |   |       |   |
| Z:                    | 0   | C:               | 0 | R:    | 0 |
| Conc:                 | 0   |                  |   |       |   |
| UOM:                  | PPM | Mean Test Assay: | 0 | PPM   |   |

Certified by:

Matthew Wilhelm



# CERTIFICATE OF ANALYSIS

## Grade of Product: EPA Protocol

|                  |                         |                     |                 |
|------------------|-------------------------|---------------------|-----------------|
| Part Number:     | E02NI99E15A0581         | Reference Number:   | 122-401180044-1 |
| Cylinder Number: | CC341990                | Cylinder Volume:    | 144.4 CF        |
| Laboratory:      | 124 - Durham (SAP) - NC | Cylinder Pressure:  | 2015 PSIG       |
| PGVP Number:     | B22018                  | Valve Outlet:       | 350             |
| Gas Code:        | PPN,BALN                | Certification Date: | Apr 17, 2018    |

**Expiration Date: Apr 17, 2026**

Certification performed in accordance with "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (May 2012)" document EPA 600/R-12/531, using the assay procedures listed. Analytical Methodology does not require correction for analytical interference. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a volume/volume basis unless otherwise noted.

Do Not Use This Cylinder below 100 psig, i.e. 0.7 megapascals.

### ANALYTICAL RESULTS

| Component | Requested Concentration | Actual Concentration | Protocol Method | Total Relative Uncertainty | Assay Dates |
|-----------|-------------------------|----------------------|-----------------|----------------------------|-------------|
| PROPANE   | 85.00 PPM               | 85.84 PPM            | G1              | +/- 0.8% NIST Traceable    | 04/17/2018  |
| NITROGEN  | Balance                 |                      |                 |                            |             |

### CALIBRATION STANDARDS

| Type | Lot ID  | Cylinder No | Concentration        | Uncertainty | Expiration Date |
|------|---------|-------------|----------------------|-------------|-----------------|
| NTRM | 0010613 | AAL18527    | 49.8 PPM PROPANE/AIR | +/- 0.6%    | May 23, 2018    |

### ANALYTICAL EQUIPMENT

| Instrument/Make/Model        | Analytical Principle | Last Multipoint Calibration |
|------------------------------|----------------------|-----------------------------|
| Nicolet 6700 AHR0801333 C3H8 | FTIR                 | Mar 22, 2018                |

Triad Data Available Upon Request



*Phil St.*  
Approved for Release

DocNumber: 000024404

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

**Customer & Order Information:**

CHEROKEE INSTRUMENTS INC  
100 LOGAN COURT  
ANGIER NC 27501

Praxair Order Number: 56678698  
Customer P. O. Number: 0050001578  
Customer Reference Number:

Fill Date: 3/14/2018  
Part Number: NI NO47.5ME-AS  
Lot Number: 30461307802  
Cylinder Style & Outlet: AS CGA 660  
Cylinder Pressure & Volume: 2000 psig 140 cu ft

**Certified Concentration:**

|                  |              |                         |
|------------------|--------------|-------------------------|
| Expiration Date: | 3/26/2021    | NIST Traceable          |
| Cylinder Number: | CC362567     | Analytical Uncertainty: |
| 48.0 ppm         | NITRIC OXIDE | ± 0.9 %                 |
| Balance          | NITROGEN     |                         |

NOx = 48.0 ppm

NOx for Reference Only

**Certification Information:** Certification Date: 3/26/2018 Term: 36 Months Expiration Date: 3/26/2021

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-800/R-12/531, using Procedure G1. Do Not Use this Standard if Pressure is less than 100 PSIG.

**Analytical Data:**

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

**1. Component: NITRIC OXIDE**

Requested Concentration: 47.5 ppm  
Certified Concentration: 48.0 ppm  
Instrument Used: MKS 2031  
Analytical Method: FTIR  
Last Multipoint Calibration: 3/15/2018

|                      |                           |         |            |
|----------------------|---------------------------|---------|------------|
| First Analysis Data: |                           | Date:   | 3/19/2018  |
| Z: 0.123             | R: 49.7                   | C: 47.1 | Conc: 47.7 |
| R: 49.5              | Z: 0.014                  | C: 47   | Conc: 47.6 |
| Z: 0.014             | C: 47.2                   | R: 49.7 | Conc: 47.8 |
| UOM: PPM             | Mean Test Assay: 47.7 PPM |         |            |

Analyzed by:

Remzy Jermal

Reference Standard Type: GM15  
Ref. Std. Cylinder #: SA4389  
Ref. Std. Conc: 50.3 PPM  
Ref. Std. Traceable to SRM #: 1663B  
SRM Sample #: 45-V-05  
SRM Cylinder #: CAL017971

|                       |                           |         |            |
|-----------------------|---------------------------|---------|------------|
| Second Analysis Data: |                           | Date:   | 3/26/2018  |
| Z: 0.023              | R: 49.5                   | C: 47.7 | Conc: 48.3 |
| R: 49.6               | Z: 0.068                  | C: 47.6 | Conc: 48.2 |
| Z: 0.063              | C: 47.6                   | R: 49.6 | Conc: 48.2 |
| UOM: PPM              | Mean Test Assay: 48.3 PPM |         |            |

Certified by:

Megha Patel





Praxair Distribution Mid-Atlantic  
One Steel Road East,  
Morrisville, PA 19067  
Tel: (800) 638-6360 Fax: (215) 736 5240  
PGVP ID: F32017

DocNumber: 000021376

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

### Customer & Order Information:

CHEROKEE INSTRUMENTS INC  
100 LOGAN COURT  
ANGIER NC 27501

Praxair Order Number: 92286180  
Customer P. O. Number: 0050001228  
Customer Reference Number:

Fill Date: 6/10/2017  
Part Number: NI NO90ME-A5  
Lot Number: 304513161704  
Cylinder Style & Outlet: AS CGA 680  
Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

### Certified Concentration:

|                  |              |                         |
|------------------|--------------|-------------------------|
| Expiration Date: | 6/21/2025    | NIST Traceable          |
| Cylinder Number: | CC200174     | Analytical Uncertainty: |
| 89.5 ppm         | NITRIC OXIDE | ± 0.5 %                 |
| Balance          | NITROGEN     |                         |

NOx = 90.0 ppm

NOx for Reference Only

Certification Information: Certification Date: 6/21/2017 Term: 96 Months Expiration Date: 6/21/2025

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Do Not Use this Standard if Pressure is less than 100 PSIG.

### Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

#### 1. Component: NITRIC OXIDE

Requested Concentration: 90 ppm  
Certified Concentration: 89.5 ppm  
Instrument Used: TECO MODEL 42i S/N: 0820017513  
Analytical Method: CHEMILUMINESCENCE  
Last Multipoint Calibration: 6/13/2017

|                               |                  |           |
|-------------------------------|------------------|-----------|
| First Analysis Date:          | Date:            | 6/14/2017 |
| Z: 0 R: 95 C: 89.5 Conc: 89.5 |                  |           |
| R: 85 Z: 0 C: 89.4 Conc: 89.4 |                  |           |
| Z: 0 C: 89.4 R: 95 Conc: 89.4 |                  |           |
| UOM: PPM                      | Mean Test Assay: | 89.4 PPM  |

Reference Standard Type: GMS  
Ref. Std. Cylinder #: CC352709  
Ref. Std. Conc: 95.0 PPM  
Ref. Std. Traceable to SRM #: 16848  
SRM Sample #: 44-T-48  
SRM Cylinder #: FF9239

|                               |                  |           |
|-------------------------------|------------------|-----------|
| Second Analysis Date:         | Date:            | 6/21/2017 |
| Z: 0 R: 95 C: 90 Conc: 89.7   |                  |           |
| R: 85.4 Z: 0 C: 80 Conc: 89.7 |                  |           |
| Z: 0 C: 90 R: 95.4 Conc: 89.7 |                  |           |
| UOM: PPM                      | Mean Test Assay: | 89.7 PPM  |

Analyzed by:

Jessica Goodman

Certified by:

Megha Patel

Information contained herein has been prepared at your request by qualified experts within Praxair Distribution, Inc. While we believe that the information is accurate within the limits of the analytical methods employed and is complete to the extent of the specific analyses performed, we make no warranty or representation as to the suitability of the use of the information for any purpose. The information is offered with the understanding that any use of the information is at the sole discretion and risk of the user. In no event shall the liability of Praxair Distribution, Inc., arising out of the use of the information contained herein exceed the fee established for providing such information.

**APPENDIX II-F**  
**Sampling Equipment Calibration Sheets**

**METHOD 5 POST-TEST CONSOLE CALIBRATION USING CALIBRATED CRITICAL ORIFICES**  
**3-POINT ENGLISH UNITS**

| Meter Console Information |        |
|---------------------------|--------|
| Console Model Number      | 522    |
| Console Serial Number     | 909033 |
| DGM Model Number          | RW 110 |
| DGM Serial Number         | 328893 |

| Calibration Conditions                   |      |          |       |
|------------------------------------------|------|----------|-------|
| Date                                     | Time | 01/21/19 | 10:30 |
| Barometric Pressure                      |      | 30.4     | in Hg |
| Theoretical Critical Vacuum <sup>1</sup> |      | 14.3     | in Hg |
| Calibration Technician                   |      | JBG      |       |

| Factors/Conversions |        |          |
|---------------------|--------|----------|
| Std Temp            | 528    | °R       |
| Std Press           | 29.92  | in Hg    |
| K <sub>1</sub>      | 17.647 | oR/in Hg |

<sup>1</sup>For valid test results, the Actual Vacuum should be 1 to 2 in. Hg greater than the Theoretical Critical Vacuum shown above.

<sup>2</sup>The Critical Orifice Coefficient, K', must be entered in English units, (ft<sup>3</sup>•oR<sup>1/2</sup>)/(in.Hg•min).

| Calibration Data |                     |                   |                     |                        |                      |                  |             |                     |                     |                  |
|------------------|---------------------|-------------------|---------------------|------------------------|----------------------|------------------|-------------|---------------------|---------------------|------------------|
| Run Time         | Metering Console    |                   |                     |                        | Critical Orifice     |                  |             |                     |                     |                  |
| Elapsed          | DGM Orifice<br>ΔH   | Volume<br>Initial | Volume<br>Final     | Outlet Temp<br>Initial | Outlet Temp<br>Final | Serial<br>Number | Coefficient | Amb Temp<br>Initial | Amb Temp<br>Final   | Actual<br>Vacuum |
| (θ)              | (P <sub>m</sub> )   | (V <sub>m</sub> ) | (V <sub>net</sub> ) | (t <sub>m</sub> )      | (t <sub>net</sub> )  |                  | K'          | (t <sub>amb</sub> ) | (t <sub>amb</sub> ) | in. Hg           |
| min              | in H <sub>2</sub> O | cubic feet        | cubic feet          | °F                     | °F                   | FO               |             | °F                  | °F                  |                  |
| 9.5              | 2.00                | 10.00             | 17.429              | 63                     | 63                   | FO-63            | 0.5906      | 66                  | 66                  | 15.00            |
| 8.0              | 2.00                | 17.429            | 23.687              | 63                     | 64                   | FO-63            | 0.5906      | 66                  | 66                  | 15.00            |
| 8.0              | 2.00                | 23.687            | 29.957              | 64                     | 64                   | FO-63            | 0.5906      | 66                  | 66                  | 15.00            |

| Results                |                         |                              |                         |                    |           |            |                     |             |
|------------------------|-------------------------|------------------------------|-------------------------|--------------------|-----------|------------|---------------------|-------------|
| Standardized Data      |                         |                              |                         | Dry Gas Meter      |           |            |                     |             |
| Dry Gas Meter          |                         | Critical Orifice             |                         | Calibration Factor |           | Flowrate   | 0.3488              |             |
| (V <sub>m(std)</sub> ) | (Q <sub>cr(std)</sub> ) | (V <sub>cr(std)</sub> )      | (Q <sub>cr(std)</sub> ) | Value              | Variation | Std & Corr | 0.75 SCFM           | Variation   |
| (Y)                    | (ΔY)                    | (Q <sub>m(std)(corr)</sub> ) | (ΔH@)                   | (ΔΔH@)             |           |            |                     |             |
| cubic feet             | cfm                     | cubic feet                   | cfm                     |                    |           | cfm        | in H <sub>2</sub> O |             |
| 7.657                  | 0.806                   | 7.596                        | 0.800                   | 0.992              | 0.000     | 0.800      | 1.824               | 0.002       |
| 6.444                  | 0.806                   | 6.397                        | 0.800                   | 0.993              | 0.001     | 0.800      | 1.822               | 0.000       |
| 6.450                  | 0.806                   | 6.397                        | 0.800                   | 0.992              | 0.000     | 0.800      | 1.820               | -0.002      |
| Pretest Gamma          | 0.9744                  | % Deviation                  | 1.8                     | 0.992              | Y Average |            | 1.822               | ΔH@ Average |

Note: For Calibration Factor Y, the ratio of the reading of the calibration meter to the dry gas meter, acceptable tolerance of individual values from the average is ±0.02.

I certify that the above Dry Gas Meter was calibrated in accordance with USEPA Methods, CFR Title 40, Part 60, Appendix A-3, Method 5, 16.2.3

Signature Jonas Gilbert

Date 1/21/2019

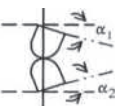
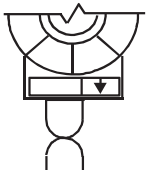
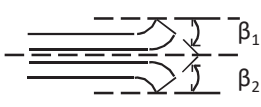

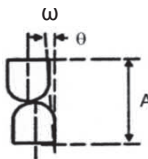
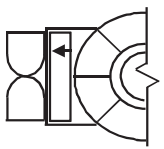
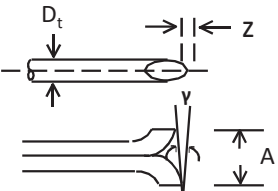
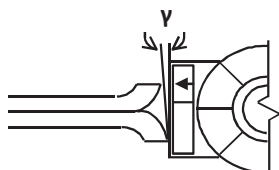
## Type S Pitot Tube Inspection

### GENERAL INFORMATION

|          |           |                   |      |
|----------|-----------|-------------------|------|
| Probe ID | 4A        | Personnel         | EBG  |
| Date     | 3/19/2019 | Coefficient Value | 0.84 |

### PITOT TUBE INSPECTION

|                                       |     |
|---------------------------------------|-----|
| Pitot Tube assembly level? (yes/no)   | yes |
| Pitot Tube obstruction? (yes/no)      | no  |
| Pitot Tube openings damaged? (yes/no) | no  |

|                                                                                     |                                                                                     |                                                            |        |                                             |
|-------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|------------------------------------------------------------|--------|---------------------------------------------|
|    |    | $\alpha_1$                                                 | 0      | $\leq \pm 10^\circ$                         |
|                                                                                     |                                                                                     | $\alpha_2$                                                 | 2      | $\leq \pm 10^\circ$                         |
|   |   | $\beta_1$                                                  | -1     | $\leq \pm 5^\circ$                          |
|                                                                                     |                                                                                     | $\beta_2$                                                  | 0      | $\leq \pm 5^\circ$                          |
|  |  | $\gamma$                                                   | 0.0087 |                                             |
|                                                                                     |                                                                                     | $\theta$                                                   | 0.0524 |                                             |
|                                                                                     |                                                                                     | $z = A \tan (\gamma)$                                      | 0.0200 | $\leq \pm \frac{1}{8}"$                     |
|                                                                                     |                                                                                     | $\omega = A \tan (\theta)$                                 | 0.0475 | $\leq \pm \frac{1}{32}"$                    |
|                                                                                     |                                                                                     | $D_t$                                                      | 0.375  |                                             |
|                                                                                     |                                                                                     | $(\frac{3}{16}" < D_t < \frac{3}{8}" \text{ Recommended})$ |        |                                             |
|  |  | A                                                          | 0.906  |                                             |
|                                                                                     |                                                                                     | $P_A$                                                      | 1.208  |                                             |
|                                                                                     |                                                                                     | $P_B$                                                      |        | $(1.05 < P/D_t < 1.50 \text{ Recommended})$ |

### STACK THERMOCOUPLE CALIBRATION

|           |                |         |      |
|-----------|----------------|---------|------|
| Ref. Type | Hg Thermometer | Ref. ID | Hg-1 |
|-----------|----------------|---------|------|

| Source                       | Ref., °F | Stack TC, °F | Abs. Diff., °F |
|------------------------------|----------|--------------|----------------|
| Ice bath                     | 32       | 32           | 0              |
| Ambient                      | 67       | 67           | 0              |
| Hot Plate                    | 232      | 231          | 1              |
| Maximum Temp. Difference, °F |          |              | 1              |

## Type S Pitot Tube Inspection

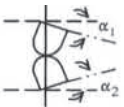
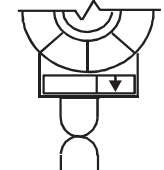
### GENERAL INFORMATION

|          |           |                   |      |
|----------|-----------|-------------------|------|
| Probe ID | 4B        | Personnel         | EJG  |
| Date     | 3/19/2019 | Coefficient Value | 0.84 |

### PITOT TUBE INSPECTION

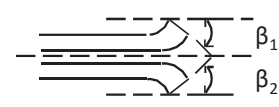
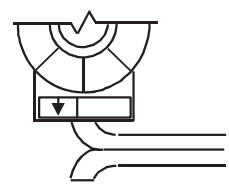
|                                       |     |
|---------------------------------------|-----|
| Pitot Tube assembly level? (yes/no)   | yes |
| Pitot Tube obstruction? (yes/no)      | no  |
| Pitot Tube openings damaged? (yes/no) | no  |

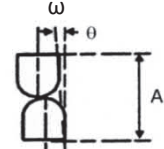
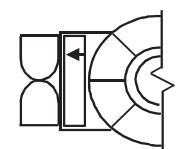
|            |   |                     |
|------------|---|---------------------|
| $\alpha_1$ | 1 | $\leq \pm 10^\circ$ |
| $\alpha_2$ | 0 | $\leq \pm 10^\circ$ |

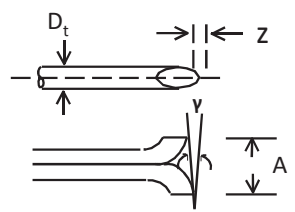
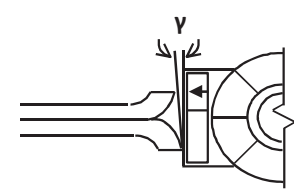
|           |   |                    |
|-----------|---|--------------------|
| $\beta_1$ | 1 | $\leq \pm 5^\circ$ |
| $\beta_2$ | 2 | $\leq \pm 5^\circ$ |

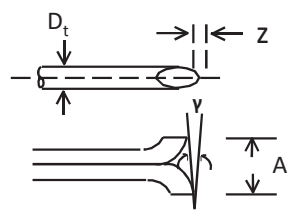
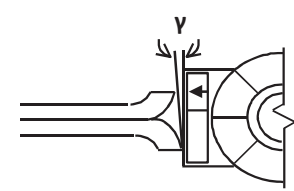
|          |   |  |
|----------|---|--|
| $\gamma$ | 0 |  |
| $\theta$ | 3 |  |

|                            |             |                           |
|----------------------------|-------------|---------------------------|
| $z = A \tan (\gamma)$      | 0.00        | $\leq \pm \frac{1}{8}''$  |
| $\omega = A \tan (\theta)$ | 0.049970818 | $\leq \pm \frac{1}{32}''$ |

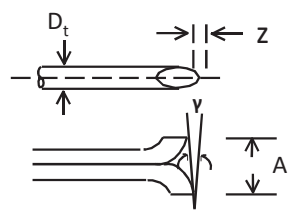
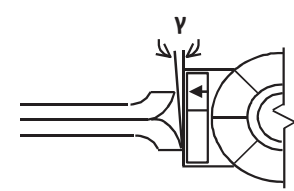
  

|       |        |  |
|-------|--------|--|
| $D_t$ | 0.3735 |  |
|-------|--------|--|

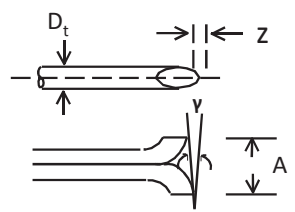
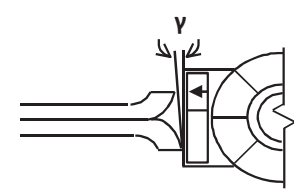
$(\frac{3}{16}'' < D_t < \frac{3}{8}'' \text{ Recommended})$

|     |        |  |
|-----|--------|--|
| $A$ | 0.9535 |  |
|-----|--------|--|

|                |      |  |
|----------------|------|--|
| $P_A$<br>$P_B$ | 1.28 |  |
|----------------|------|--|

$(1.05 < P/D_t < 1.50 \text{ Recommended})$

**APPENDIX II-G**  
**Process Data**



Pine Content, January 16, 2019: 80% by weight

| Appendix II-G, Table 1. Process Data, RCO 2, January 16, 2019, Run 1 |            |             |             |             |             |         |
|----------------------------------------------------------------------|------------|-------------|-------------|-------------|-------------|---------|
| Process Parameter                                                    | 9:45<br>AM | 10:00<br>AM | 10:15<br>AM | 10:30<br>AM | 10:45<br>AM | Average |
| Run Time 9:45-10:52 a.m.                                             |            |             |             |             |             |         |
| Short Tons/hour (wet basis)                                          | 25.8       | 25.8        | 25.8        | 25.8        | 25.8        | 25.8    |
| Production, ODT/hour                                                 | 24.3       | 24.3        | 24.3        | 24.3        | 24.3        | 24.3    |
| Pellet Moisture Content, % weight                                    | 5.93       | 5.93        | 5.93        | 5.93        | 5.93        | 5.93    |
| RCO 2 Diff. Pressure, in w.c.                                        | 1.8        | 1.3         | 0.53        | 1.2         | 1.9         | 1.3     |
| RCO 2 Burner SP, °F                                                  | 750        | 750         | 750         | 750         | 750         | 750     |
| RCO 2 Burner Temps, PV, ° F                                          | 782        | 789         | 745         | 785         | 782         | 777     |
| Cyclofilter 1 Diff. Pressure., in w.c.                               | 0.8        | 0.8         | 0.8         | 0.9         | 0.8         | 0.82    |
| Cyclofilter 2 Diff. Pressure, in w.c.                                | 0.5        | 0.5         | 0.6         | 0.6         | 0.6         | 0.56    |

Notes

No run for PM, VOC, CO, NO<sub>x</sub>, HCl,  
Methane, Ethane, Methanol,  
Formaldehyde, and Acetaldehyde

Failed leak test for PM results

Moisture was consistent with Runs 3 thru  
5.

| Appendix II-G, Table 2. Process Data, RCO 2, January 16, 2019, Run 2 |            |            |            |            |            |            |            |            |         |
|----------------------------------------------------------------------|------------|------------|------------|------------|------------|------------|------------|------------|---------|
| Process Parameter                                                    | 11:43 a.m. | 11:58 a.m. | 12:13 p.m. | 12:32 p.m. | 12:47 p.m. | 13:02 p.m. | 13:17 p.m. | 13:27 p.m. | Average |
| Run Time 11:44 a.m.-13:18 p.m..                                      |            |            |            |            |            |            |            |            |         |
| Short Tons/hour (wet basis)                                          | 26.6       | 26.6       | 26.6       | 26.6       | 26.6       | 26.6       | 26.6       | 26.6       | 26.6    |
| Production, ODT/hour                                                 | 25.2       | 25.2       | 25.2       | 25.2       | 25.2       | 25.2       | 25.2       | 25.2       | 25.2    |
| Pellet Moisture Content, % weight                                    | 5.13       | 5.13       | 5.13       | 5.13       | 5.13       | 5.45       | 5.45       | 5.45       | 5.45    |
| RCO 2 Diff. Pressure, in w.c.                                        | 1.8        | 1.2        | 1.3        | 1.2        | 1.3        | 1.3        | 1.5        | 0.5        | 1.3     |
| RCO 2 Burner SP, °F                                                  | 750        | 750        | 750        | 750        | 750        | 750        | 750        | 750        | 750     |
| RCO 2 Burner Temps, PV, °F                                           | 741        | 796        | 771        | 754        | 763        | 781        | 736        | 758        | 763     |
| Cyclofilter 1 Diff. Pressure, in w.c.                                | 0.6        | 0.6        | 0.7        | 0.6        | 0.6        | 0.7        | 0.6        | 0.6        | 0.6     |
| Cyclofilter 2 Diff. Pressure, in w.c.                                | 0.5        | 0.5        | 0.4        | 0.4        | 0.4        | 0.4        | 0.4        | 0.4        | 0.4     |

#### Notes

1. Paused test, 12:24pm to 12:28pm, 2.2 vibration, but during a port change, so did not affect testing.

Had power issue with analyzer, does not affect the emissions, extended the run

No run for PM, VOC, CO, NOx, HCl, Methane, Ethane, Methanol, Formaldehyde, and Acetaldehyde

failed leak test for PM results

Moisture was consistent with Runs 3 thru 5.

| Appendix II-G, Table 3. Process Data, RCO 2, January 16, 2019, Run 3 |               |               |               |               |               |               |         |
|----------------------------------------------------------------------|---------------|---------------|---------------|---------------|---------------|---------------|---------|
| Process Parameter                                                    | 14:07<br>p.m. | 14:22<br>p.m. | 14:37<br>p.m. | 14:52<br>p.m. | 15:07<br>p.m. | 15:22<br>p.m. | Average |
| Run Time 14:07 p.m.-15:23 p.m.                                       |               |               |               |               |               |               |         |
| Short Tons/hour (wet basis)                                          | 26.6          | 26.6          | 26.6          | 26.6          | 26.6          | 26.6          | 26.6    |
| Production, ODT/hour                                                 | 25.1          | 25.1          | 25.1          | 25.1          | 25.1          | 25.1          | 25.1    |
| Pellet Moisture Content, % wt.t                                      | 5.78          | 5.78          | 5.78          | 5.78          | 5.78          | 5.78          | 5.78    |
| RCO 2 Diff. Pressure, in w.c.                                        | 1.2           | 1.4           | 0.53          | 1.7           | 1.3           | 0.70          | 1.1     |
| RCO 2 Burner SP, °F                                                  | 750           | 750           | 750           | 750           | 750           | 750           | 750     |
| RCO 2 Burner Temps, PV, ° F                                          | 748           | 766           | 745           | 784           | 774           | 743           | 760     |
| Cyclofilter 1 Diff. Press. in w.c.                                   | 0.6           | 0.7           | 0.6           | 0.6           | 0.7           | 0.6           | 0.6     |
| Cyclofilter 2 Diff. Press., in w.c.                                  | 0.4           | 0.4           | 0.4           | 0.4           | 0.4           | 0.4           | 0.4     |

Passed the post-test leak check. First accepted run for PM, run 3 for VOC, CO, NOx, HCl, Methane, Ethane, Methanol, Formaldehyde, and Acetaldehyde

| Appendix II-G, Table 4. Process Data, RCO 2, January 16, 2019, Run 4 |              |              |              |              |              |              |         |
|----------------------------------------------------------------------|--------------|--------------|--------------|--------------|--------------|--------------|---------|
| Process Parameter                                                    | 3:45<br>p.m. | 4:00<br>p.m. | 4:15<br>p.m. | 4:30<br>p.m. | 4:45<br>p.m. | 4:58<br>p.m. | Average |
| Run Time 15:45 p.m.-16:58 p.m.                                       |              |              |              |              |              |              |         |
| Short Tons/hour (wet basis)                                          | 26.6         | 26.6         | 26.6         | 26.6         | 26.6         | 26.6         | 26.6    |
| Production, ODT/hour                                                 | 25.2         | 25.2         | 25.2         | 25.2         | 25.2         | 25           | 25.2    |
| Pellet Moisture Content, % wt.t                                      | 5.24         | 5.24         | 5.24         | 5.24         | 5.24         | 5.41         | 5.27    |
| RCO 2 Diff. Pressure, in w.c.                                        | 1.3          | 1.3          | 1.7          | 1.6          | 1.3          | 1.2          | 1.4     |
| RCO 2 Burner SP, °F                                                  | 750          | 750          | 750          | 750          | 750          | 750          | 750     |
| RCO 2 Burner Temps, PV, ° F                                          | 698          | 786          | 769          | 747          | 765          | 769          | 756     |
| Cyclofilter 1 Diff. Press. in w.c.                                   | 0.6          | 0.6          | 0.6          | 0.6          | 0.6          | 0.6          | 0.6     |
| Cyclofilter 2 Diff. Press., in w.c.                                  | 0.4          | 0.4          | 0.4          | 0.4          | 0.4          | 0.4          | 0.4     |

#### Notes

Passed the post-test leak check. Run included PM, VOC, CO, NOx, HCl, Methane, Ethane, Methanol, Formaldehyde, and Acetaldehyde

| Appendix II-G, Table 5. Process Data, RCO 2, January 16, 2019, Run 5 |               |               |               |               |              |               |               |         |
|----------------------------------------------------------------------|---------------|---------------|---------------|---------------|--------------|---------------|---------------|---------|
| Process Parameter                                                    | 18:38<br>p.m. | 18:53<br>p.m. | 19:08<br>p.m. | 19:23<br>p.m. | 7:38<br>p.m. | 19:49<br>p.m. | 20:01<br>p.m. | Average |
| Run Time 18:35 p.m.-20:01 p.m.                                       |               |               |               |               |              |               |               |         |
| Short Tons/hour<br>(wet basis)                                       | 25.1          | 25.1          | 25.1          | 22.6          | 21.3         | 24.1          | 25.1          | 24.1    |
| Production,<br>ODT/hour                                              | 23.9          | 23.9          | 23.9          | 21.5          | 20.3         | 22.9          | 23.9          | 22.9    |
| Pellet Moisture<br>Content, % wt.t                                   | 4.81          | 4.81          | 4.81          | 4.81          | 4.81         | 4.81          | 4.81          | 4.81    |
| RCO 2 Diff. Pressure,<br>in w.c.                                     | 1.2           | 1.8           | 1.6           | 1.3           | 1.6          | 1.2           | 1.5           | 1.5     |
| RCO 2 Burner SP,<br>°F                                               | 750           | 750           | 750           | 750           | 750.0        | 750           | 750           | 750     |
| RCO 2 Burner Temps, PV,<br>°F                                        | 762           | 726           | 782           | 783           | 782          | 767           | 768           | 767     |
| Cyclofilter 1 Diff. Press.<br>in w.c.                                | 0.7           | 0.7           | 0.7           | 0.7           | 0.7          | 0.7           | 0.7           | 0.7     |
| Cyclofilter 2 Diff. Press., in<br>w.c.                               | 0.4           | 0.4           | 0.4           | 0.4           | 0.4          | 0.4           | 0.4           | 0.4     |

#### Notes

Passed post-test leak check. Run included PM,  
VOC, CO, NOx, HCl, Methane, Ethane,  
Methanol, Formaldehyde, and Acetaldehyde

Paused sampling due to presses going offline  
due to high vibration or high temp roller  
bearings

Feed screw on two of the presses amped out  
causing loss of feed.

| Appendix II-G, Table 2. Process Data, RCO 2, January 16, 2019, Run 2 |            |            |            |            |            |            |            |            |         |
|----------------------------------------------------------------------|------------|------------|------------|------------|------------|------------|------------|------------|---------|
| Process Parameter                                                    | 11:43 a.m. | 11:58 a.m. | 12:13 p.m. | 12:32 p.m. | 12:47 p.m. | 13:02 p.m. | 13:17 p.m. | 13:27 p.m. | Average |
| Run Time 11:44 a.m.-13:18 p.m..                                      |            |            |            |            |            |            |            |            |         |
| Short Tons/hour (wet basis)                                          | 26.6       | 26.6       | 26.6       | 26.6       | 26.6       | 26.6       | 26.6       | 26.6       | 26.6    |
| Production, ODT/hour                                                 | 25.2       | 25.2       | 25.2       | 25.2       | 25.2       | 25.2       | 25.2       | 25.2       | 25.2    |
| Pellet Moisture Content, % weight                                    | 5.13       | 5.13       | 5.13       | 5.13       | 5.13       | 5.45       | 5.45       | 5.45       | 5.45    |
| RCO 2 Diff. Pressure, in w.c.                                        | 1.8        | 1.2        | 1.3        | 1.2        | 1.3        | 1.3        | 1.5        | 0.5        | 1.3     |
| RCO 2 Burner SP, °F                                                  | 750        | 750        | 750        | 750        | 750        | 750        | 750        | 750        | 750     |
| RCO 2 Burner Temps, PV, °F                                           | 741        | 796        | 771        | 754        | 763        | 781        | 736        | 758        | 763     |
| Cyclofilter 1 Diff. Pressure., in w.c.                               | 0.6        | 0.6        | 0.7        | 0.6        | 0.6        | 0.7        | 0.6        | 0.6        | 0.6     |
| Cyclofilter 2 Diff. Pressure, in w.c.                                | 0.5        | 0.5        | 0.4        | 0.4        | 0.4        | 0.4        | 0.4        | 0.4        | 0.4     |

#### Notes

1. Paused test, 12:24pm to 12:28pm, 2.2 vibration, but during a port change, so did not affect testing.

Had power issue with analyzer, does not affect the emissions, extended the run

No run for PM, VOC, CO, NOx, HCl, Methane, Ethane, Methanol, Formaldehyde, and Acetaldehyde

failed leak test for PM results

Moisture was consistent with Runs 3 thru 5.

| Appendix II-G, Table 3. Process Data, RCO 2, January 16, 2019, Run 3 |               |               |               |               |               |               |         |
|----------------------------------------------------------------------|---------------|---------------|---------------|---------------|---------------|---------------|---------|
| Process Parameter                                                    | 14:07<br>p.m. | 14:22<br>p.m. | 14:37<br>p.m. | 14:52<br>p.m. | 15:07<br>p.m. | 15:22<br>p.m. | Average |
| Run Time 14:07 p.m.-15:23 p.m.                                       |               |               |               |               |               |               |         |
| Short Tons/hour (wet basis)                                          | 26.6          | 26.6          | 26.6          | 26.6          | 26.6          | 26.6          | 26.6    |
| Production, ODT/hour                                                 | 25.1          | 25.1          | 25.1          | 25.1          | 25.1          | 25.1          | 25.1    |
| Pellet Moisture Content, % wt.t                                      | 5.78          | 5.78          | 5.78          | 5.78          | 5.78          | 5.78          | 5.78    |
| RCO 2 Diff. Pressure, in w.c.                                        | 1.2           | 1.4           | 0.53          | 1.7           | 1.3           | 0.70          | 1.1     |
| RCO 2 Burner SP, °F                                                  | 750           | 750           | 750           | 750           | 750           | 750           | 750     |
| RCO 2 Burner Temps, PV, ° F                                          | 748           | 766           | 745           | 784           | 774           | 743           | 760     |
| Cyclofilter 1 Diff. Press. in w.c.                                   | 0.6           | 0.7           | 0.6           | 0.6           | 0.7           | 0.6           | 0.6     |
| Cyclofilter 2 Diff. Press., in w.c.                                  | 0.4           | 0.4           | 0.4           | 0.4           | 0.4           | 0.4           | 0.4     |

Passed the post-test leak check. First accepted run for PM, run 3 for VOC, CO, NOx, HCl, Methane, Ethane, Methanol, Formaldehyde, and Acetaldehyde

| Appendix II-G, Table 4. Process Data, RCO 2, January 16, 2019, Run 4 |              |              |              |              |              |              |         |
|----------------------------------------------------------------------|--------------|--------------|--------------|--------------|--------------|--------------|---------|
| Process Parameter                                                    | 3:45<br>p.m. | 4:00<br>p.m. | 4:15<br>p.m. | 4:30<br>p.m. | 4:45<br>p.m. | 4:58<br>p.m. | Average |
| Run Time 15:45 p.m.-16:58 p.m.                                       |              |              |              |              |              |              |         |
| Short Tons/hour (wet basis)                                          | 26.6         | 26.6         | 26.6         | 26.6         | 26.6         | 26.6         | 26.6    |
| Production, ODT/hour                                                 | 25.2         | 25.2         | 25.2         | 25.2         | 25.2         | 25           | 25.2    |
| Pellet Moisture Content, % wt.t                                      | 5.24         | 5.24         | 5.24         | 5.24         | 5.24         | 5.41         | 5.27    |
| RCO 2 Diff. Pressure, in w.c.                                        | 1.3          | 1.3          | 1.7          | 1.6          | 1.3          | 1.2          | 1.4     |
| RCO 2 Burner SP, °F                                                  | 750          | 750          | 750          | 750          | 750          | 750          | 750     |
| RCO 2 Burner Temps, PV, ° F                                          | 698          | 786          | 769          | 747          | 765          | 769          | 756     |
| Cyclofilter 1 Diff. Press. in w.c.                                   | 0.6          | 0.6          | 0.6          | 0.6          | 0.6          | 0.6          | 0.6     |
| Cyclofilter 2 Diff. Press., in w.c.                                  | 0.4          | 0.4          | 0.4          | 0.4          | 0.4          | 0.4          | 0.4     |

#### Notes

Passed the post-test leak check. Run included PM, VOC, CO, NOx, HCl, Methane, Ethane, Methanol, Formaldehyde, and Acetaldehyde

| Appendix II-G, Table 5. Process Data, RCO 2, January 16, 2019, Run 5 |               |               |               |               |              |               |               |         |
|----------------------------------------------------------------------|---------------|---------------|---------------|---------------|--------------|---------------|---------------|---------|
| Process Parameter                                                    | 18:38<br>p.m. | 18:53<br>p.m. | 19:08<br>p.m. | 19:23<br>p.m. | 7:38<br>p.m. | 19:49<br>p.m. | 20:01<br>p.m. | Average |
| Run Time 18:35 p.m.-20:01 p.m.                                       |               |               |               |               |              |               |               |         |
| Short Tons/hour<br>(wet basis)                                       | 25.1          | 25.1          | 25.1          | 22.6          | 21.3         | 24.1          | 25.1          | 24.1    |
| Production,<br>ODT/hour                                              | 23.9          | 23.9          | 23.9          | 21.5          | 20.3         | 22.9          | 23.9          | 22.9    |
| Pellet Moisture<br>Content, % wt.t                                   | 4.81          | 4.81          | 4.81          | 4.81          | 4.81         | 4.81          | 4.81          | 4.81    |
| RCO 2 Diff. Pressure,<br>in w.c.                                     | 1.2           | 1.8           | 1.6           | 1.3           | 1.6          | 1.2           | 1.5           | 1.5     |
| RCO 2 Burner SP,<br>°F                                               | 750           | 750           | 750           | 750           | 750.0        | 750           | 750           | 750     |
| RCO 2 Burner Temps, PV,<br>°F                                        | 762           | 726           | 782           | 783           | 782          | 767           | 768           | 767     |
| Cyclofilter 1 Diff. Press.<br>in w.c.                                | 0.7           | 0.7           | 0.7           | 0.7           | 0.7          | 0.7           | 0.7           | 0.7     |
| Cyclofilter 2 Diff. Press., in<br>w.c.                               | 0.4           | 0.4           | 0.4           | 0.4           | 0.4          | 0.4           | 0.4           | 0.4     |

#### Notes

Passed post-test leak check. Run included PM,  
VOC, CO, NOx, HCl, Methane, Ethane,  
Methanol, Formaldehyde, and Acetaldehyde

Paused sampling due to presses going offline  
due to high vibration or high temp roller  
bearings

Feed screw on two of the presses amped out  
causing loss of feed.

**APPENDIX III-A**  
**Method 5-Method 202 Data Sheets**



Date 3/7/2019

|                                                   |                             |            |
|---------------------------------------------------|-----------------------------|------------|
| Client                                            | Enviva                      |            |
| Job #                                             | 2333                        |            |
| Plant Name                                        | Enviva, Greenwood           |            |
| City, State                                       | Greenwood, SC               |            |
| Sampling Location                                 | RCO 1 - Pellet Cooler South |            |
| No. of Ports Available                            | 2                           |            |
| No. of Ports Used                                 | 2                           |            |
| Port Inside Diameter, Inches                      | 4                           |            |
| Distance From Far Wall To Outside Of Port, Inches | 45                          |            |
| Nipple Length And/Or Wall Thickness, Inches       | 3                           |            |
| Depth Of Stack Or Duct, Inches                    | 42                          |            |
| Stack Or Duct Width (if rectangular), Inches      |                             |            |
| Equiv. Diameter = $2DW/(D+W)$ , Inches            |                             |            |
| Stack/Duct Area, Square Feet                      | 9.621                       |            |
| $(\pi R^2 \text{ or } L \times W)$                |                             |            |
|                                                   | Upstream                    | Downstream |
| Distance to Flow Disturbances, feet               | 6                           | 5          |
| Diameters                                         | 1.7                         | 1.4        |

| Diameters |       |       |             |
|-----------|-------|-------|-------------|
| Velocity  | Up    | Down  | Particulate |
| 12        | >7.00 | >1.75 | 12          |
| 12        | 6     | 1.5   | 16          |
| 16        | 5     | 1.25  | 20          |
| 16        | 2     | 0.5   | 24 or 25    |

Note: If more than 8 and 2 diameters and duct is greater than 12" and less than 24", use 8 or 9 points.

| Location of Points in Circular Stacks or Ducts |      |      |      |      |      |      |      |      |      |      |      |
|------------------------------------------------|------|------|------|------|------|------|------|------|------|------|------|
|                                                | 4    | 6    | 8    | 10   | 12   | 14   | 16   | 18   | 20   | 22   | 24   |
| 1                                              | 6.7  | 4.4  | 3.2  | 2.6  | 2.1  | 1.8  | 1.6  | 1.4  | 1.3  | 1.1  | 1.1  |
| 2                                              | 25.0 | 14.6 | 10.5 | 8.2  | 6.7  | 5.7  | 4.9  | 4.4  | 3.9  | 3.5  | 3.2  |
| 3                                              | 75.0 | 29.6 | 19.4 | 14.6 | 11.8 | 9.9  | 8.5  | 7.5  | 6.7  | 6.0  | 5.5  |
| 4                                              | 93.3 | 70.4 | 32.3 | 22.6 | 17.7 | 14.6 | 12.5 | 10.9 | 9.7  | 8.7  | 7.9  |
| 5                                              |      | 85.4 | 67.7 | 34.2 | 25.0 | 20.1 | 16.9 | 14.6 | 12.9 | 1106 | 10.5 |
| 6                                              |      | 95.6 | 80.6 | 65.8 | 35.6 | 26.9 | 22.0 | 18.8 | 16.5 | 14.6 | 13.2 |
| 7                                              |      |      | 89.5 | 77.4 | 64.4 | 36.6 | 28.3 | 23.6 | 20.4 | 18.0 | 16.1 |
| 8                                              |      |      | 96.8 | 85.4 | 75.0 | 63.4 | 37.5 | 29.6 | 25.0 | 21.8 | 19.4 |
| 9                                              |      |      |      | 91.8 | 82.3 | 73.1 | 62.5 | 38.2 | 30.6 | 26.2 | 23   |
| 10                                             |      |      |      | 97.4 | 88.2 | 79.9 | 71.7 | 61.8 | 38.8 | 31.5 | 27.2 |
| 11                                             |      |      |      |      | 93.3 | 85.4 | 78.0 | 70.4 | 61.2 | 39.3 | 32.3 |
| 12                                             |      |      |      |      | 97.9 | 90.1 | 83.1 | 76.4 | 69.4 | 60.7 | 39.8 |
| 13                                             |      |      |      |      |      | 94.3 | 87.5 | 81.2 | 75   | 68.5 | 60.2 |
| 14                                             |      |      |      |      |      | 98.2 | 91.5 | 85.4 | 79.6 | 73.8 | 67.7 |
| 15                                             |      |      |      |      |      |      | 95.1 | 89.1 | 83.5 | 78.2 | 72.8 |
| 16                                             |      |      |      |      |      |      | 98.4 | 92.5 | 87.1 | 82.0 | 77   |
| 17                                             |      |      |      |      |      |      |      | 95.6 | 90.3 | 85.4 | 80.6 |
| 18                                             |      |      |      |      |      |      |      | 98.6 | 93.3 | 88.4 | 83.9 |
| 19                                             |      |      |      |      |      |      |      |      | 96.1 | 91.3 | 86.8 |
| 20                                             |      |      |      |      |      |      |      |      | 98.7 | 94.0 | 89.5 |
| 21                                             |      |      |      |      |      |      |      |      |      | 96.5 | 92.1 |
| 22                                             |      |      |      |      |      |      |      |      |      | 98.9 | 94.5 |
| 23                                             |      |      |      |      |      |      |      |      |      |      | 96.8 |
| 24                                             |      |      |      |      |      |      |      |      |      |      | 99.  |

[illegible][illegible]

|                       |                       |
|-----------------------|-----------------------|
| 0.0000 - 0.0625 - 0   | 0.5625 - 0.6875 - 5/8 |
| 0.0625 - 0.1875 - 1/8 | 0.6875 - 0.8125 - 3/4 |
| 0.1875 - 0.3125 - 1/4 | 0.8125 - 0.9375 - 7/8 |
| 0.3125 - 0.4375 - 3/8 | 0.9375 - 1.0000 - 1   |
| 0.4375 - 0.5625 - 1/2 |                       |

| PRELIMINARY INFORMATION                    |                             |                 |                              |                         |                     |        |
|--------------------------------------------|-----------------------------|-----------------|------------------------------|-------------------------|---------------------|--------|
| Plant Name                                 | Enviva, Greenwood           |                 | Date                         | 3/6/2019                |                     |        |
| City, State                                | Greenwood, SC               |                 | Project #                    | 2333                    |                     |        |
| Personnel                                  | EJG, WS                     |                 | Pitot Identification         | 4A                      |                     |        |
| Test Location                              | Pellet Cooler RCO1          |                 | Pitot Coefficient (Cp)       | 0.84                    |                     |        |
| <b>Stack Dimensions</b>                    |                             |                 | <b>Pressures</b>             |                         |                     |        |
| Length of Stack (D)                        | 42                          | in              | Barometric Pressure (Pb)     | 30.1                    | in Hg               |        |
| Width of Stack (W)                         |                             | in              | Static Pressure (Pg)         | 3.8                     | in H <sub>2</sub> O |        |
| Area of Stack (As)                         | 9.621                       | ft <sup>2</sup> | Absolute Stack Pressure (Ps) | 30.38                   | in Hg               |        |
| <b>Stack Gas Composition</b>               |                             |                 |                              |                         |                     |        |
| Carbon Dioxide (%CO <sub>2</sub> )         | 0.0                         |                 | Moisture Content (Bws)       | 5.35                    | %                   |        |
| Oxygen (%O <sub>2</sub> )                  | 20.9                        |                 | Dry Molecular Weight (Md)    | 28.84                   | lb/lb-mole          |        |
| Nitrogen Concentration (%N <sub>2</sub> )  | 79.1                        |                 | Wet Molecular Weight (Ms)    | 28.26                   | lb/lb-mole          |        |
| Start                                      | <b>Preliminary Traverse</b> |                 |                              |                         |                     |        |
|                                            | Pitot Tube Leak Checks      |                 |                              | A                       | B                   |        |
|                                            | Port                        | Point           | Angle, °                     | Δp, in H <sub>2</sub> O | Temp. °F            | ft/sec |
|                                            | A                           | 1               | 0                            | 1.25                    | 156                 | 68.01  |
|                                            |                             | 2               | -1                           | 1.20                    | 157                 | 66.69  |
|                                            |                             | 3               | -2                           | 1.20                    | 160                 | 66.85  |
|                                            |                             | 4               | 1                            | 1.25                    | 163                 | 68.40  |
|                                            |                             | 5               | -8                           | 1.20                    | 160                 | 66.85  |
|                                            |                             | 6               | -5                           | 1.30                    | 156                 | 69.36  |
|                                            | B                           | 1               | -3                           | 1.10                    | 160                 | 64.01  |
|                                            |                             | 2               | -4                           | 1.05                    | 164                 | 62.86  |
|                                            |                             | 3               | -3                           | 1.10                    | 170                 | 64.52  |
|                                            |                             | 4               | 5                            | 1.45                    | 160                 | 73.49  |
|                                            |                             | 5               | 8                            | 1.50                    | 159                 | 74.68  |
|                                            |                             | 6               | 8                            | 1.50                    | 168                 | 75.22  |
|                                            | X                           | 1               | -2                           | 1.4                     | 159                 | 72.15  |
|                                            |                             | 2               | -5                           | 1.3                     |                     | 59.94  |
|                                            |                             | 3               | 2                            | 1.35                    |                     | 61.08  |
|                                            |                             | 4               | 3                            | 1.45                    | 137                 | 72.11  |
|                                            |                             | 5               | 0                            | 1.1                     |                     | 55.13  |
|                                            |                             | 6               | 0                            | 1.2                     |                     | 57.58  |
|                                            |                             | 7               | 0                            | 1.2                     |                     | 57.58  |
|                                            |                             | 8               | 3                            | 1.2                     |                     | 57.58  |
|                                            |                             | 9               | 5                            | 1.3                     | 172                 | 70.25  |
|                                            |                             | 10              | 0                            | 1.35                    | 177                 | 71.87  |
|                                            |                             | 11              | 0                            | 1.55                    | 176                 | 76.95  |
|                                            |                             | 12              | 5                            | 1.65                    | 176                 | 79.40  |
|                                            | End                         |                 |                              |                         |                     |        |
|                                            |                             |                 |                              |                         |                     |        |
| Average Angle, Degrees                     |                             | 3.04            |                              |                         |                     |        |
| Average Velocity Pressure                  |                             |                 | 1.2936                       |                         |                     |        |
|                                            |                             |                 |                              | 162.8                   |                     |        |
| Average Stack Gas Velocity (ft/sec)        |                             |                 |                              | 69.57                   |                     |        |
| Actual Cubic Feet per minute (ACFM)        |                             |                 |                              | 40,159                  |                     |        |
| Dry Standard Cubic Feet per Minute (DSCFM) |                             |                 |                              | 32,720                  |                     |        |

**Air Control Techniques, P.C.**  
**Isokinetic Sampling Train Field Data Sheet**

|              |               |                 |
|--------------|---------------|-----------------|
| <b>Job #</b> | <b>Run ID</b> | <b>M5/202-1</b> |
| 2333         | Method        | 5/202           |

| IDENTIFICATION INFORMATION            |                    |                  |                   | PRELIMINARY CHECKS AND DATA                                                                                                                                                                                                                                         |  |  |  |                        |       |                                       |                      |                             |                       |                  |                       |      |       |    |
|---------------------------------------|--------------------|------------------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|------------------------|-------|---------------------------------------|----------------------|-----------------------------|-----------------------|------------------|-----------------------|------|-------|----|
| Plant                                 | Enviva, Greenwood  |                  |                   | <table border="1"> <tr> <td>Actual</td> <td>Req'd</td> <td>Vacuum</td> </tr> <tr> <td>Pre Leak Check, ACFM</td> <td>0.00</td> <td>&lt;0.02 or 4%</td> <td>10</td> </tr> <tr> <td>Post Leak Check, ACFM</td> <td>0.00</td> <td>0.020</td> <td>11</td> </tr> </table> |  |  |  | Actual                 | Req'd | Vacuum                                | Pre Leak Check, ACFM | 0.00                        | <0.02 or 4%           | 10               | Post Leak Check, ACFM | 0.00 | 0.020 | 11 |
| Actual                                | Req'd              | Vacuum           |                   |                                                                                                                                                                                                                                                                     |  |  |  |                        |       |                                       |                      |                             |                       |                  |                       |      |       |    |
| Pre Leak Check, ACFM                  | 0.00               | <0.02 or 4%      | 10                |                                                                                                                                                                                                                                                                     |  |  |  |                        |       |                                       |                      |                             |                       |                  |                       |      |       |    |
| Post Leak Check, ACFM                 | 0.00               | 0.020            | 11                |                                                                                                                                                                                                                                                                     |  |  |  |                        |       |                                       |                      |                             |                       |                  |                       |      |       |    |
| City, State                           | Greenwood, SC      |                  |                   |                                                                                                                                                                                                                                                                     |  |  |  |                        |       |                                       |                      |                             |                       |                  |                       |      |       |    |
| Test Location                         | Pellet Cooler RCO1 |                  |                   |                                                                                                                                                                                                                                                                     |  |  |  |                        |       |                                       |                      |                             |                       |                  |                       |      |       |    |
| Date                                  | 3/7/19             | 14973            | Filter ID 1       | <table border="1"> <tr> <td>A</td> <td>B</td> </tr> <tr> <td>Pitot Pre Leak Check</td> <td>4</td> <td>6</td> </tr> <tr> <td>Pitot Post Leak Check</td> <td>4</td> <td>5</td> </tr> </table>                                                                         |  |  |  | A                      | B     | Pitot Pre Leak Check                  | 4                    | 6                           | Pitot Post Leak Check | 4                | 5                     |      |       |    |
| A                                     | B                  |                  |                   |                                                                                                                                                                                                                                                                     |  |  |  |                        |       |                                       |                      |                             |                       |                  |                       |      |       |    |
| Pitot Pre Leak Check                  | 4                  | 6                |                   |                                                                                                                                                                                                                                                                     |  |  |  |                        |       |                                       |                      |                             |                       |                  |                       |      |       |    |
| Pitot Post Leak Check                 | 4                  | 5                |                   |                                                                                                                                                                                                                                                                     |  |  |  |                        |       |                                       |                      |                             |                       |                  |                       |      |       |    |
| Start                                 | 9:10               |                  | Filter ID 2       |                                                                                                                                                                                                                                                                     |  |  |  |                        |       |                                       |                      |                             |                       |                  |                       |      |       |    |
| Stop                                  | 10:15              |                  | Filter ID 3       |                                                                                                                                                                                                                                                                     |  |  |  |                        |       |                                       |                      |                             |                       |                  |                       |      |       |    |
| Meterbox ID                           | 909033             | EJG, WS          | Operator*         | <table border="1"> <tr> <td>Ambient Temperature</td> <td>31</td> </tr> <tr> <td>Static Pressure, In. H<sub>2</sub>O</td> <td>0.25</td> </tr> <tr> <td>Barometric Pressure, In. Hg</td> <td>30.10</td> </tr> </table>                                                |  |  |  | Ambient Temperature    | 31    | Static Pressure, In. H <sub>2</sub> O | 0.25                 | Barometric Pressure, In. Hg | 30.10                 |                  |                       |      |       |    |
| Ambient Temperature                   | 31                 |                  |                   |                                                                                                                                                                                                                                                                     |  |  |  |                        |       |                                       |                      |                             |                       |                  |                       |      |       |    |
| Static Pressure, In. H <sub>2</sub> O | 0.25               |                  |                   |                                                                                                                                                                                                                                                                     |  |  |  |                        |       |                                       |                      |                             |                       |                  |                       |      |       |    |
| Barometric Pressure, In. Hg           | 30.10              |                  |                   |                                                                                                                                                                                                                                                                     |  |  |  |                        |       |                                       |                      |                             |                       |                  |                       |      |       |    |
| ΔH <sub>g</sub>                       | 1.928              | 4A               | Stack TC ID       |                                                                                                                                                                                                                                                                     |  |  |  |                        |       |                                       |                      |                             |                       |                  |                       |      |       |    |
| Gamma (Y)                             | 0.9760             | NA               | Tedlar Bags       |                                                                                                                                                                                                                                                                     |  |  |  |                        |       |                                       |                      |                             |                       |                  |                       |      |       |    |
| Ideal Nozzle                          | 0.200              | NA               | Orsat Pump        |                                                                                                                                                                                                                                                                     |  |  |  |                        |       |                                       |                      |                             |                       |                  |                       |      |       |    |
| Nozzle Dia.                           | 0.206              | 4ft              | Probe Length/Type | <b>ACTUAL MOISTURE &amp; GAS COMPOSITION</b> <table border="1"> <tr> <td>Water Recovered, grams</td> <td>64.3</td> <td>Moisture, %</td> <td>5.97</td> </tr> <tr> <td>CO<sub>2</sub> %</td> <td>0.00</td> <td>O<sub>2</sub> %</td> <td>20.61</td> </tr> </table>     |  |  |  | Water Recovered, grams | 64.3  | Moisture, %                           | 5.97                 | CO <sub>2</sub> %           | 0.00                  | O <sub>2</sub> % | 20.61                 |      |       |    |
| Water Recovered, grams                | 64.3               | Moisture, %      | 5.97              |                                                                                                                                                                                                                                                                     |  |  |  |                        |       |                                       |                      |                             |                       |                  |                       |      |       |    |
| CO <sub>2</sub> %                     | 0.00               | O <sub>2</sub> % | 20.61             |                                                                                                                                                                                                                                                                     |  |  |  |                        |       |                                       |                      |                             |                       |                  |                       |      |       |    |
| Nozzle ID                             | M12                | 1.51             | K Factor          |                                                                                                                                                                                                                                                                     |  |  |  |                        |       |                                       |                      |                             |                       |                  |                       |      |       |    |
| Probe ID                              | 4A                 | 60A              | Umbilic ID        |                                                                                                                                                                                                                                                                     |  |  |  |                        |       |                                       |                      |                             |                       |                  |                       |      |       |    |

| Sampling Information |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|----------------------|---------------------|----------------------|------------------------|-----------------------------------|-----------------|-----------------|---------------------------------|-----------------|------------------|----------------|---------------|-------------------|---------------------------------|--------------|-----------------|
| Point                | Time Per Pt. (Min.) | Elapsed Time (h:m:s) | Dry Gas Meter (cu.ft.) | Velocity ΔP (In H <sub>2</sub> O) | Meter Temp (°F) | Stack Temp (°F) | Actual ΔH (in H <sub>2</sub> O) | Probe Temp (°F) | Filter Temp (°F) | Exit Temp (°F) | CPM Temp (°F) | Pump Vac (in. Hg) | Target ΔH (in H <sub>2</sub> O) | Run ISO % Pt | Lk √ During Run |
| 1                    | 2.5                 | 0                    | 743                    | 1.45                              | 37              | 161             | 2.3                             | 248             | 256              | 41             | 69            | 4.5               | 2.202                           | 101.5        | LC 1            |
| 2                    | 2.5                 | 2:30                 | 745.01                 | 1.55                              | 46              | 143             | 2.5                             | 250             | 236              | 36             | 68            | 5.5               | 2.463                           | 98.8         |                 |
| 3                    | 2.5                 | 5:0                  | 747.1                  | 1.4                               | 46              | 158             | 2.25                            | 253             | 243              | 35             | 69            | 5.5               | 2.170                           | 102.7        |                 |
| 4                    | 2.5                 | 7:30                 | 749.14                 | 1.3                               | 47              | 159             | 1.6                             | 250             | 232              | 38             | 69            | 4                 | 2.017                           | 94.3         | LC-2            |
| 5                    | 2.5                 | 10:0                 | 750.95                 | 1.2                               | 47              | 157             | 1.95                            | 251             | 229              | 39             | 69            | 4.5               | 1.871                           | 103.0        |                 |
| 6                    | 2.5                 | 12:30                | 752.85                 | 1.3                               | 48              | 148             | 2                               | 252             | 234              | 40             | 69            | 5                 | 2.059                           | 98.0         |                 |
| 7                    | 2.5                 | 15:0                 | 754.75                 | 1.2                               | 48              | 132             | 2.1                             | 257             | 244              | 40             | 70            | 4.75              | 1.952                           | 103.9        | LC-3            |
| 8                    | 2.5                 | 17:30                | 756.71                 | 1.25                              | 49              | 167             | 2.1                             | 256             | 244              | 41             | 69            | 5                 | 1.923                           | 106.1        |                 |
| 9                    | 2.5                 | 20:0                 | 758.7                  | 1.15                              | 50              | 153             | 1.9                             | 257             | 248              | 43             | 70            | 4.5               | 1.813                           | 109.7        |                 |
| 10                   | 2.5                 | 22:30                | 760.7                  | 1.1                               | 50              | 163             | 1.6                             | 255             | 246              | 43             | 69            | 4.5               | 1.707                           | 101.7        | LC-4            |
| 11                   | 2.5                 | 25:0                 | 762.5                  | 1.1                               | 50              | 165             | 1.7                             | 256             | 244              | 43             | 69            | 4                 | 1.703                           | 96.8         |                 |
| 12                   | 2.5                 | 27:30                | 764.21                 | 1.4                               | 51              | 158             | 2.2                             | 255             | 247              | 43             | 69            | 5                 | 2.196                           | 96.2         |                 |
| 1                    | 2.5                 | 30:0                 | 766.14                 | 1.5                               | 51              | 167             | 2.35                            | 245             | 227              | 41             | 68            | 5.5               | 2.316                           | 109.7        | LC-5            |
| 2                    | 2.5                 | 32:30                | 768.4                  | 1.2                               | 51              | 135             | 1.6                             | 252             | 233              | 41             | 68            | 5                 | 1.952                           | 91.8         | 766.14          |
| 3                    | 2.5                 | 35:0                 | 770.14                 | 1.2                               | 52              | 163             | 2                               | 257             | 244              | 41             | 68            | 5                 | 1.871                           | 102.5        | 766.28          |
| 4                    | 2.5                 | 37:30                | 772.04                 | 1.45                              | 52              | 185             | 2.25                            | 255             | 247              | 41             | 68            | 5                 | 2.181                           | 101.9        | LC-6            |
| 5                    | 2.5                 | 40:0                 | 774.08                 | 1.25                              | 53              | 175             | 2.1                             | 256             | 246              | 42             | 68            | 5                 | 1.913                           | 107.6        |                 |
| 6                    | 2.5                 | 42:30                | 776.1                  | 1.25                              | 53              | 148             | 2.1                             | 247             | 231              | 43             | 69            | 5                 | 1.998                           | 104.2        |                 |
| 7                    | 2.5                 | 45:0                 | 778.1                  | 1.1                               | 53              | 130             | 2                               | 248             | 232              | 44             | 69            | 5                 | 1.812                           | 103.9        | LC-7            |
| 8                    | 2.5                 | 47:30                | 780                    | 1.05                              | 53              | 132             | 1.9                             | 252             | 233              | 44             | 69            | 4.5               | 1.724                           | 110.5        |                 |
| 9                    | 2.5                 | 50:0                 | 781.97                 | 1.1                               | 55              | 178             | 1.75                            | 255             | 238              | 45             | 68            | 4.5               | 1.683                           | 103.6        |                 |
| 10                   | 2.5                 | 52:30                | 783.8                  | 1.3                               | 55              | 167             | 2.1                             | 251             | 232              | 45             | 69            | 5                 | 2.025                           | 100.8        | LC-8            |
| 11                   | 2.5                 | 55:0                 | 785.75                 | 1.15                              | 55              | 146             | 2                               | 247             | 227              | 45             | 68            | 5                 | 1.852                           | 106.4        |                 |
| 12                   | 2.5                 | 57:30                | 787.72                 | 1.5                               | 56              | 147             | 2.5                             | 251             | 232              | 46             | 68            | 6                 | 2.417                           | 103.1        |                 |
|                      |                     | 1:00:0               | 789.9                  |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |

| Total | Averages |                      |      |       | Maximum and Minimum Values |     |     |    |    | Run ISO |
|-------|----------|----------------------|------|-------|----------------------------|-----|-----|----|----|---------|
| Vm    | 46.76    | 1.265                | 50.3 | 155.7 | 2.035                      | 257 | 256 | 46 | 70 | 6       |
| Vmstd | 47.738   | in. H <sub>2</sub> O | °F   | °F    | in H <sub>2</sub> O        | 245 | 227 | 35 | 68 | %       |

Run Notes:

---



---



---

**Air Control Techniques, P.C.**  
**Isokinetic Sampling Train Field Data Sheet**

|              |               |                 |
|--------------|---------------|-----------------|
| <b>Job #</b> | <b>Run ID</b> | <b>M5/202-2</b> |
| 2333         | Method        | 5/202           |

| IDENTIFICATION INFORMATION                   |                    |         |                   | PRELIMINARY CHECKS AND DATA           |                  |             |        |
|----------------------------------------------|--------------------|---------|-------------------|---------------------------------------|------------------|-------------|--------|
| Plant                                        | Enviva, Greenwood  |         |                   | Pre Leak Check, ACFM                  | Actual           | Req'd       | Vacuum |
| City, State                                  | Greenwood, SC      |         |                   |                                       | 0.00             | <0.02 or 4% | 11     |
| Test Location                                | Pellet Cooler RCO1 |         |                   | Post Leak Check, ACFM                 | 0.00             | 0.020       | 9      |
| Date                                         | 3/7/19             | 14974   | Filter ID 1       | A B                                   |                  |             |        |
| Start                                        | 11:08              |         | Filter ID 2       | Pitot Pre Leak Check                  |                  |             |        |
| Stop                                         | 12:22              |         | Filter ID 3       | 8 6                                   |                  |             |        |
| Meterbox ID                                  | 909033             | EJG, WS | Personnel         | Pitot Post Leak Check                 |                  |             |        |
| ΔH@                                          | 1.928              | 4B      | Stack TC ID       | 5 4                                   |                  |             |        |
| Gamma (Y)                                    | 0.9760             | NA      | Tedlar Bags       | Ambient Temperature                   |                  |             |        |
| Ideal Nozzle                                 | 0.199              | NA      | Orsat Pump        | 55                                    |                  |             |        |
| Nozzle Dia.                                  | 0.206              | 4b      | Probe Length/Type | Static Pressure, In. H <sub>2</sub> O |                  |             |        |
| Nozzle ID                                    | M11                | 1.56    | K Factor          | 0.25                                  |                  |             |        |
| Probe ID                                     | 4B                 | 60A     | Umbilicle ID      | Barometric Pressure, In. Hg           |                  |             |        |
|                                              |                    |         |                   | 30.10                                 |                  |             |        |
| <b>ACTUAL MOISTURE &amp; GAS COMPOSITION</b> |                    |         |                   |                                       |                  |             |        |
| Water Recovered, grams                       |                    |         |                   | 68.2                                  | Moisture, %      |             | 6.34   |
| CO <sub>2</sub> %                            |                    |         |                   | 0.00                                  | O <sub>2</sub> % |             | 20.60  |

| Sampling Information |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|----------------------|---------------------|----------------------|------------------------|-----------------------------------|-----------------|-----------------|---------------------------------|-----------------|------------------|----------------|---------------|-------------------|---------------------------------|--------------|-----------------|
| Point                | Time Per Pt. (Min.) | Elapsed Time (h:m:s) | Dry Gas Meter (cu.ft.) | Velocity ΔP (In H <sub>2</sub> O) | Meter Temp (°F) | Stack Temp (°F) | Actual ΔH (in H <sub>2</sub> O) | Probe Temp (°F) | Filter Temp (°F) | Exit Temp (°F) | CPM Temp (°F) | Pump Vac (in. Hg) | Target ΔH (in H <sub>2</sub> O) | Run ISO % Pt | Lk √ During Run |
| 1                    | 2.5                 | 0                    | 790.178                | 1.45                              | 56              | 160             | 2.4                             | 250             | 225              | 50             | 68            | 4.5               | 2.265                           | 108.6        | LC 1            |
| 2                    | 2.5                 | 2:30                 | 792.4                  | 1.5                               | 58              | 158             | 2.4                             | 250             | 225              | 41             | 68            | 4.75              | 2.355                           | 99.4         |                 |
| 3                    | 2.5                 | 5:0                  | 794.48                 | 1.25                              | 58              | 162             | 2.5                             | 252             | 228              | 41             | 68            | 4.75              | 1.950                           | 106.1        |                 |
| 4                    | 2.5                 | 7:30                 | 796.5                  | 1.4                               | 58              | 203             | 2.2                             | 250             | 228              | 43             | 68            | 5                 | 2.048                           | 97.3         | LC-2            |
| 5                    | 2.5                 | 10:0                 | 798.4                  | 1.1                               | 60              | 180             | 1.8                             | 245             | 235              | 49             | 68            | 3.5               | 1.675                           | 109.6        |                 |
| 6                    | 2.5                 | 12:30                | 800.34                 | 1.2                               | 58              | 212             | 1.8                             | 245             | 249              | 44             | 69            | 4                 | 1.735                           | 103.5        |                 |
| 7                    | 2.5                 | 15:0                 | 802.2                  | 1.3                               | 59              | 205             | 1.8                             | 246             | 242              | 44             | 68            | 3.5               | 1.903                           | 106.1        | LC-3            |
| 8                    | 2.5                 | 17:30                | 804.2                  | 1.2                               | 59              | 188             | 1.8                             | 245             | 244              | 45             | 68            | 4                 | 1.803                           | 107.9        |                 |
| 9                    | 2.5                 | 20:0                 | 806.18                 | 1.15                              | 59              | 180             | 1.8                             | 247             | 248              | 46             | 68            | 3.5               | 1.749                           | 106.3        |                 |
| 10                   | 2.5                 | 22:30                | 808.1                  | 1.2                               | 59              | 211             | 1.8                             | 248             | 254              | 46             | 68            | 3.5               | 1.741                           | 94.3         | LC-4            |
| 11                   | 2.5                 | 25:0                 | 809.8                  | 1.3                               | 59              | 205             | 1.9                             | 251             | 251              | 46             | 68            | 4                 | 1.903                           | 99.0         |                 |
| 12                   | 2.5                 | 27:30                | 811.665                | 1.3                               | 59              | 186             | 2.1                             | 251             | 242              | 46             | 69            | 4.5               | 1.959                           | 106.8        |                 |
| 1                    | 2.5                 | 30:0                 | 813.705                | 1.5                               | 59              | 160             | 2.1                             | 258             | 256              | 45             | 75            | 4.5               | 2.354                           | 100.0        | LC-5            |
| 2                    | 2.5                 | 32:30                | 815.8                  | 1.2                               | 58              | 155             | 2                               | 255             | 255              | 44             | 75            | 4.5               | 1.895                           | 100.1        | 813.657         |
| 3                    | 2.5                 | 35:0                 | 817.68                 | 1.4                               | 59              | 160             | 2.3                             | 255             | 253              | 45             | 77            | 5                 | 2.197                           | 103.8        | 813.705         |
| 4                    | 2.5                 | 37:30                | 819.78                 | 1.4                               | 58              | 162             | 2.3                             | 256             | 252              | 46             | 78            | 5                 | 2.184                           | 105.2        | LC-6            |
| 5                    | 2.5                 | 40:0                 | 821.9                  | 1.25                              | 59              | 188             | 2                               | 256             | 251              | 48             | 80            | 4.5               | 1.876                           | 106.9        |                 |
| 6                    | 2.5                 | 42:30                | 823.9                  | 1.2                               | 59              | 189             | 1.85                            | 256             | 253              | 49             | 80            | 4                 | 1.799                           | 109.1        |                 |
| 7                    | 2.5                 | 45:0                 | 825.9                  | 1.2                               | 59              | 184             | 1.825                           | 253             | 253              | 49             | 74            | 4                 | 1.814                           | 92.4         | LC-7            |
| 8                    | 2.5                 | 47:30                | 827.6                  | 1.15                              | 59              | 185             | 1.8                             | 255             | 253              | 50             | 68            | 4                 | 1.736                           | 108.3        |                 |
| 9                    | 2.5                 | 50:0                 | 829.55                 | 1.2                               | 59              | 180             | 1.8                             | 256             | 254              | 50             | 68            | 4                 | 1.825                           | 100.2        |                 |
| 10                   | 2.5                 | 52:30                | 831.4                  | 1.35                              | 60              | 212             | 2                               | 255             | 255              | 50             | 68            | 4                 | 1.960                           | 101.9        | LC-8            |
| 11                   | 2.5                 | 55:0                 | 833.35                 | 1.4                               | 60              | 200             | 2.1                             | 255             | 254              | 51             | 68            | 4.5               | 2.068                           | 100.7        |                 |
| 12                   | 2.5                 | 57:30                | 835.33                 | 1.65                              | 60              | 204             | 2.5                             | 253             | 251              | 53             | 68            | 5                 | 2.422                           | 103.2        |                 |
|                      |                     | 1:00:0               | 837.524                |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |
|                      |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |              |                 |

|                   | Total  | Averages             |      |       |                     |     | Maximum and Minimum Values |    |    |   |  | Run ISO |
|-------------------|--------|----------------------|------|-------|---------------------|-----|----------------------------|----|----|---|--|---------|
| V <sub>m</sub>    | 47.298 | 1.299                | 58.8 | 184.5 | 2.036               | 258 | 256                        | 53 | 80 | 5 |  | 103.4   |
| V <sub>mstd</sub> | 47.500 | in. H <sub>2</sub> O | °F   | °F    | in H <sub>2</sub> O | 245 | 225                        | 41 | 68 |   |  | %       |

Run Notes:

---



---



---

**Air Control Techniques, P.C.**  
**Isokinetic Sampling Train Field Data Sheet**

|              |               |                 |
|--------------|---------------|-----------------|
| <b>Job #</b> | <b>Run ID</b> | <b>M5/202-3</b> |
| 2333         | Method        | 5/202           |

| IDENTIFICATION INFORMATION        |                    |                  |                   | PRELIMINARY CHECKS AND DATA                                                                                                                                                                                                                                                                                                |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
|-----------------------------------|--------------------|------------------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-------------|--------|-----------------------------------|--|--|--|------------------------|------|-------------|------|-------------------|------|------------------|-------|
| Plant                             | Enviva, Greenwood  |                  |                   | Pre Leak Check, ACFM                                                                                                                                                                                                                                                                                                       | Actual                | Req'd       | Vacuum |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| City, State                       | Greenwood, SC      |                  |                   |                                                                                                                                                                                                                                                                                                                            | 0.00                  | <0.02 or 4% | 9      |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Test Location                     | Pellet Cooler RCO1 |                  |                   |                                                                                                                                                                                                                                                                                                                            | Post Leak Check, ACFM | 0.00        | 0.020  | 9.5                               |  |  |  |                        |      |             |      |                   |      |                  |       |
| Date                              | 3/7/19             | 14977            | Filter ID 1       |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Start                             | 13:04              |                  | Filter ID 2       |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Stop                              | 14:18              |                  | Filter ID 3       |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Meterbox ID                       | 909033             | EJG, WS          | Personnel         |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| ΔH <sub>0</sub>                   | 1.928              | 4A               | Stack TC ID       |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Gamma (Y)                         | 0.9760             | NA               | Tedlar Bags       |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Ideal Nozzle                      | 0.200              | NA               | Orsat Pump        |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Nozzle Dia.                       | 0.206              | 4a               | Probe Length/Type |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Nozzle ID                         | M12                | 1.50             | K Factor          |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Probe ID                          | 4A                 | 60A              | Umbilicle ID      |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
|                                   |                    |                  |                   | <table border="1"> <thead> <tr> <th colspan="4">ACTUAL MOISTURE &amp; GAS COMPOSITION</th> </tr> </thead> <tbody> <tr> <td>Water Recovered, grams</td> <td>74.4</td> <td>Moisture, %</td> <td>7.02</td> </tr> <tr> <td>CO<sub>2</sub> %</td> <td>0.01</td> <td>O<sub>2</sub> %</td> <td>20.53</td> </tr> </tbody> </table> |                       |             |        | ACTUAL MOISTURE & GAS COMPOSITION |  |  |  | Water Recovered, grams | 74.4 | Moisture, % | 7.02 | CO <sub>2</sub> % | 0.01 | O <sub>2</sub> % | 20.53 |
| ACTUAL MOISTURE & GAS COMPOSITION |                    |                  |                   |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| Water Recovered, grams            | 74.4               | Moisture, %      | 7.02              |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |
| CO <sub>2</sub> %                 | 0.01               | O <sub>2</sub> % | 20.53             |                                                                                                                                                                                                                                                                                                                            |                       |             |        |                                   |  |  |  |                        |      |             |      |                   |      |                  |       |

|       |                     | Sampling Information |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |                  |       |                 |
|-------|---------------------|----------------------|------------------------|-----------------------------------|-----------------|-----------------|---------------------------------|-----------------|------------------|----------------|---------------|-------------------|---------------------------------|------------------|-------|-----------------|
| Point | Time Per Pt. (Min.) | Elapsed Time (h:m:s) | Dry Gas Meter (cu.ft.) | Velocity ΔP (In H <sub>2</sub> O) | Meter Temp (°F) | Stack Temp (°F) | Actual ΔH (in H <sub>2</sub> O) | Probe Temp (°F) | Filter Temp (°F) | Exit Temp (°F) | CPM Temp (°F) | Pump Vac (in. Hg) | Target ΔH (in H <sub>2</sub> O) | Run ISO % Pt Cum |       | Lk √ During Run |
| 1     | 2.5                 | 0                    | 838.421                | 1.4                               | 60              | 189             | 2.2                             | 225             | 238              | 58             | 77            | 5                 | 2.092                           | 108.3            | 101.5 | LC 1            |
| 2     | 2.5                 | 2:30                 | 840.56                 | 1.2                               | 61              | 202             | 1.9                             | 225             | 238              | 46             | 72            | 5                 | 1.758                           | 105.2            | 103.3 |                 |
| 3     | 2.5                 | 5:0                  | 842.47                 | 1.4                               | 61              | 186             | 1.95                            | 230             | 240              | 48             | 72            | 4.5               | 2.104                           | 95.2             | 100.5 |                 |
| 4     | 2.5                 | 7:30                 | 844.36                 | 1.15                              | 62              | 183             | 1.8                             | 249             | 238              | 50             | 70            | 4.5               | 1.739                           | 107.3            | 102.1 | LC-2            |
| 5     | 2.5                 | 10:0                 | 846.3                  | 1.05                              | 62              | 220             | 1.5                             | 256             | 255              | 51             | 69            | 4                 | 1.502                           | 105.6            | 102.9 |                 |
| 6     | 2.5                 | 12:30                | 848.075                | 1.35                              | 62              | 197             | 2.1                             | 255             | 250              | 52             | 70            | 4.75              | 2.001                           | 102.0            | 102.7 |                 |
| 7     | 2.5                 | 15:0                 | 850.05                 | 1.15                              | 63              | 191             | 1.8                             | 254             | 250              | 52             | 70            | 1.8               | 1.721                           | 105.6            | 103.1 | LC-3            |
| 8     | 2.5                 | 17:30                | 851.95                 | 1.2                               | 63              | 189             | 1.9                             | 257             | 256              | 53             | 73            | 4.5               | 1.802                           | 103.2            | 103.1 |                 |
| 9     | 2.5                 | 20:0                 | 853.85                 | 1.1                               | 63              | 218             | 1.75                            | 256             | 254              | 53             | 73            | 4.5               | 1.581                           | 107.2            | 103.6 |                 |
| 10    | 2.5                 | 22:30                | 855.7                  | 1.1                               | 64              | 218             | 1.7                             | 256             | 250              | 53             | 77            | 4                 | 1.585                           | 107.3            | 103.9 | LC-4            |
| 11    | 2.5                 | 25:0                 | 857.555                | 1.15                              | 63              | 212             | 1.8                             | 256             | 260              | 54             | 79            | 4.5               | 1.669                           | 104.7            | 104.0 |                 |
| 12    | 2.5                 | 27:30                | 859.41                 | 1.4                               | 64              | 210             | 2.15                            | 255             | 253              | 54             | 75            | 5                 | 2.041                           | 109.2            | 104.5 |                 |
| 1     | 2.5                 | 30:0                 | 861.55                 | 1.45                              | 64              | 197             | 2.2                             | 251             | 245              | 54             | 80            | 5                 | 2.154                           | 102.8            | 104.3 | LC-5            |
| 2     | 2.5                 | 32:30                | 863.62                 | 1.3                               | 64              | 222             | 2                               | 254             | 251              | 48             | 78            | 4.5               | 1.860                           | 105.8            | 104.4 | 861.415         |
| 3     | 2.5                 | 35:0                 | 865.6                  | 1.5                               | 64              | 213             | 2.3                             | 254             | 256              | 48             | 68            | 5                 | 2.176                           | 103.8            | 104.4 | 861.55          |
| 4     | 2.5                 | 37:30                | 867.7                  | 1.3                               | 65              | 205             | 2                               | 254             | 253              | 49             | 73            | 4.5               | 1.910                           | 106.9            | 104.5 | LC-6            |
| 5     | 2.5                 | 40:0                 | 869.73                 | 1.35                              | 65              | 195             | 2.15                            | 258             | 252              | 48             | 68            | 4.75              | 2.016                           | 101.6            | 104.4 |                 |
| 6     | 2.5                 | 42:30                | 871.71                 | 1.2                               | 65              | 188             | 2                               | 256             | 250              | 48             | 68            | 4.75              | 1.810                           | 107.6            | 104.5 |                 |
| 7     | 2.5                 | 45:0                 | 873.7                  | 1.2                               | 66              | 188             | 2.1                             | 257             | 256              | 49             | 69            | 4.75              | 1.815                           | 108.0            | 104.7 | LC-7            |
| 8     | 2.5                 | 47:30                | 875.7                  | 1.05                              | 67              | 193             | 1.75                            | 253             | 252              | 49             | 69            | 4                 | 1.578                           | 104.0            | 104.7 |                 |
| 9     | 2.5                 | 50:0                 | 877.5                  | 1.2                               | 67              | 210             | 1.8                             | 251             | 255              | 49             | 72            | 4                 | 1.759                           | 106.8            | 104.8 |                 |
| 10    | 2.5                 | 52:30                | 879.45                 | 1.05                              | 67              | 195             | 1.65                            | 256             | 256              | 49             | 72            | 4                 | 1.575                           | 102.4            | 104.7 | LC-8            |
| 11    | 2.5                 | 55:0                 | 881.22                 | 1.4                               | 67              | 216             | 2.1                             | 255             | 255              | 49             | 73            | 4                 | 2.035                           | 106.0            | 104.7 |                 |
| 12    | 2.5                 | 57:30                | 883.3                  | 1.5                               | 67              | 200             | 2.3                             | 254             | 256              | 49             | 72            | 5                 | 2.231                           | 98.7             | 104.5 |                 |
|       | 2.5                 | 1:00:0               | 885.327                |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |                  |       |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |                  |       |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |                  |       |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |                  |       |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |                  |       |                 |
|       |                     |                      |                        |                                   |                 |                 |                                 |                 |                  |                |               |                   |                                 |                  |       |                 |

|                   | Total  | Averages             |      |       |                     |     | Maximum and Minimum Values |    |    |   |  | Run ISO |
|-------------------|--------|----------------------|------|-------|---------------------|-----|----------------------------|----|----|---|--|---------|
| V <sub>m</sub>    | 46.771 | 1.252                | 64.0 | 201.5 | 1.954               | 258 | 260                        | 58 | 80 | 5 |  | 105.1   |
| V <sub>mstd</sub> | 46.495 | in. H <sub>2</sub> O | °F   | °F    | in H <sub>2</sub> O | 225 | 238                        | 46 | 68 |   |  | %       |

Run Notes:

---



---



---

**Method 4 - Air Control Techniques, P.C.**

Date 3/7/2019

**Source Information**

|                   |                    |           |        |
|-------------------|--------------------|-----------|--------|
| Plant Name        | Enviva, Greenwood  | Job #     | 2333   |
| City, State       | Greenwood, SC      | Personnel | TH, WS |
| Sampling Location | Pellet Cooler RCO1 | Balance   |        |

**Sampling Information**

|                       |          |          |          |  |
|-----------------------|----------|----------|----------|--|
| Run Number            | M5/202-1 | M5/202-2 | M5/202-3 |  |
| Filter Identification | 14973    | 14974    | 14977    |  |
| Sampling Date         | 3/7/2019 | 3/7/2019 | 3/7/2019 |  |

**Moisture Data**Impinger 1 - Empty

|                        |       |       |       |  |
|------------------------|-------|-------|-------|--|
| Final Weight, grams    | 406.8 | 429.2 | 426.2 |  |
| Initial Weight, grams  | 368.2 | 396.5 | 368.8 |  |
| Condensed Water, grams | 38.6  | 32.7  | 57.4  |  |

Impinger 2 - Empty

|                        |       |       |       |  |
|------------------------|-------|-------|-------|--|
| Final Weight, grams    | 606.4 | 618.3 | 603.6 |  |
| Initial Weight, grams  | 601.4 | 606.0 | 603.5 |  |
| Condensed Water, grams | 5.0   | 12.3  | 0.1   |  |

Impinger 3

|                        |       |       |       |  |
|------------------------|-------|-------|-------|--|
| Final Weight, grams    | 595.3 | 658.7 | 591.3 |  |
| Initial Weight, grams  | 585.1 | 647.7 | 586.6 |  |
| Condensed Water, grams | 10.2  | 11.0  | 4.7   |  |

Silica Gel

|                       |       |       |       |  |
|-----------------------|-------|-------|-------|--|
| Final Weight, grams   | 802.2 | 891.7 | 814.4 |  |
| Initial Weight, grams | 791.7 | 879.5 | 802.2 |  |
| Adsorbed Water, grams | 10.5  | 12.2  | 12.2  |  |

|                    |      |      |      |  |
|--------------------|------|------|------|--|
| Total Water, grams | 64.3 | 68.2 | 74.4 |  |
|--------------------|------|------|------|--|

**Sampling Train Purge Data**

|             |      |      |      |  |
|-------------|------|------|------|--|
| Purge Start | 1030 | 1250 | 1430 |  |
| Purge End   | 1130 | 1350 | 1530 |  |

**Plant Name** Enviva, Greenwood  
**City, State** Greenwood, SC

**Project #** 2333  
**Test Location** Pellet Cooler RCO1

| Parameter                                       | Nomenclature/<br>Units            | M5/202-1      | M5/202-2      | M5/202-3      | Averages      |
|-------------------------------------------------|-----------------------------------|---------------|---------------|---------------|---------------|
| Date                                            |                                   | 3/7/2019      | 3/7/2019      | 3/7/2019      |               |
| Run Time                                        | $\theta$ , minutes                | 60            | 60            | 60            |               |
| Production Rate                                 | ODT/hour                          | 39.5          | 40.3          | 40.5          | 40.1          |
| Nozzle Diameter                                 | inches                            | 0.206         | 0.206         | 0.206         |               |
| Stack Area                                      | As - sq. ft.                      | 9.62          | 9.62          | 9.62          |               |
| Pitot Tube Coefficient                          | Cp                                | 0.84          | 0.84          | 0.84          |               |
| Meter Calibration Factor                        | Y                                 | 0.9760        | 0.9760        | 0.9760        |               |
| Barometric Pressure, inches Hg                  | Bp - in. Hg                       | 30.10         | 30.10         | 30.10         |               |
| Static Pressure                                 | Pg - in. H <sub>2</sub> O         | 0.25          | 0.25          | 0.25          |               |
| Stack Pressure                                  | Ps - in. Hg                       | 30.12         | 30.12         | 30.12         |               |
| Meter Box Pressure Differential                 | $\Delta H$ - in. H <sub>2</sub> O | 2.04          | 2.04          | 1.95          |               |
| Average Velocity Head                           | $\Delta P$ - in. H <sub>2</sub> O | 1.2647        | 1.2988        | 1.2522        |               |
| Volume of Gas Sampled                           | V <sub>m</sub> - cu. ft.          | 46.76         | 47.298        | 46.771        |               |
| Dry Gas Meter Temperature                       | T <sub>m</sub> - °F               | 50.3          | 58.8          | 64.0          |               |
| Stack Temperature                               | T <sub>s</sub> - °F               | 155.7         | 184.5         | 201.5         | 180.6         |
| Stack Temperature                               | T <sub>s</sub> - °C               | 68.7          | 84.7          | 94.2          |               |
| Liquid Collected                                | grams                             | 64.3          | 68.2          | 74.4          |               |
| Oxygen                                          | O <sub>2</sub> %                  | 20.70         | 20.70         | 20.53         | 20.6          |
| Carbon Dioxide                                  | CO <sub>2</sub> %                 | 0.004         | 0.000         | 0.010         | 0.0045        |
| Nitrogen                                        | N <sub>2</sub> %                  | 79.30         | 79.30         | 79.46         |               |
| Volume of Gas Sampled, Dry                      | V <sub>m(std)</sub> - cu. ft.     | 47.738        | 47.500        | 46.495        | 47.2          |
| Volume of Gas Sampled, Dry                      | V <sub>m(std)</sub> - cu. M       | 1.352         | 1.345         | 1.317         |               |
| Volume of Gas Sampled, Dry                      | V <sub>m(std)</sub> - N cu. M     | 1.259         | 1.253         | 1.226         |               |
| Volume of Water Vapor                           | V <sub>w(std)</sub> - cu. ft.     | 3.032         | 3.216         | 3.508         |               |
| Moisture Content                                | % H <sub>2</sub> O                | 5.97          | 6.34          | 7.02          | 6.44          |
| Saturation Moisture                             | % H <sub>2</sub> O                | 28.83         | 56.00         | 80.34         |               |
| Dry Mole Fraction                               | M <sub>fd</sub>                   | 0.940         | 0.937         | 0.930         |               |
| Gas Molecular Weight, Dry                       | M <sub>d</sub>                    | 28.83         | 28.83         | 28.82         |               |
| Gas Molecular Weight, Wet                       | M <sub>s</sub>                    | 28.18         | 28.14         | 28.06         |               |
| Gas Velocity                                    | vs - ft./sec.                     | 68.78         | 71.37         | 71.09         | 70.4          |
| Gas Velocity                                    | m/sec.                            | 20.96         | 21.75         | 21.67         |               |
| Volumetric Air Flow, Actual                     | Q <sub>aw</sub> - ACFM            | 39,706        | 41,198        | 41,040        | 40,648        |
| Volumetric Air Flow, Actual                     | m <sup>3</sup> /min               | 1,124         | 1,167         | 1,162         |               |
| Volumetric Air Flow, Standard                   | Q <sub>sd</sub> - DSCFM           | 32,229        | 31,818        | 30,659        | 31,569        |
| Volumetric Air Flow, Standard                   | Nm <sup>3</sup> /min              | 850           | 839           | 808           |               |
| Isokinetic Sampling Rate                        | I %                               | 102.6         | 103.4         | 105.1         |               |
| <b>FILTERABLE PARTICULATE MATTER EMISSIONS</b>  |                                   |               |               |               |               |
| Filterable Particulate Catch                    | mg                                | 1.9           | 1.9           | 1.1           |               |
| Concentration                                   | gr/DSCF                           | 0.00061       | 0.00062       | 0.00037       | 0.00053       |
| Mass Emission Rate                              | lb/hr                             | <b>0.17</b>   | <b>0.17</b>   | <b>0.10</b>   | <b>0.14</b>   |
| Mass Emission Rate                              | lbs./ODT                          | <b>0.0043</b> | <b>0.0042</b> | <b>0.0024</b> | <b>0.0036</b> |
| <b>CONDENSABLE PARTICULATE MATTER EMISSIONS</b> |                                   |               |               |               |               |
| Condensable Particulate Catch                   | mg                                | 2.1           | 1.6           | 2.5           |               |
| Concentration                                   | gr/DSCF                           | 0.0007        | 0.0005        | 0.0008        | 0.0007        |
| Mass Emission Rate                              | lb/hr                             | <b>0.19</b>   | <b>0.14</b>   | <b>0.22</b>   | <b>0.18</b>   |
| Mass Emission Rate                              | lbs./ODT                          | <b>0.0047</b> | <b>0.0035</b> | <b>0.0054</b> | <b>0.0046</b> |
| <b>TOTAL PARTICULATE MATTER EMISSIONS</b>       |                                   |               |               |               |               |
| Mass Emission Rate                              | lb/hr                             | <b>0.36</b>   | <b>0.31</b>   | <b>0.31</b>   | <b>0.32</b>   |
| Mass Emission Rate                              | lbs./ODT                          | <b>0.0090</b> | <b>0.0077</b> | <b>0.0078</b> | <b>0.0082</b> |

**APPENDIX III-B**  
**Method 5-Method 202 Laboratory Report**



# RESOLUTION ANALYTICS, INC.

Specialists in Air Emissions Analysis

## ANALYTICAL REPORT

CLIENT: AIR CONTROL TECHNIQUES, INC.

PROJECT: 2333

### ANALYTICAL SERVICES PROVIDED:

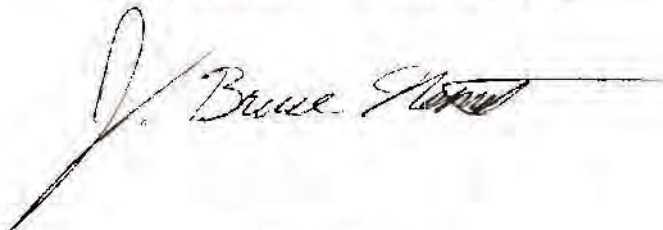
- FILTERABLE & CONDENSIBLE PARTICULATE MATTER  
(EPA METHOD 5/202)

#### Confirmation of Data Review:

The analytical data and results provided in this report have been checked thoroughly for accuracy, has been performed and validated in accordance with the approved methods, and relate only to the samples provided for this project report.

The results contained herein shall not be reproduced except in full, without written approval of Resolution Analytics.

Date of Review: March 12, 2019



J. Bruce Nemet  
Quality Assurance Officer

[www.resolutionanalytics.com](http://www.resolutionanalytics.com)  
208 Technology Park Lane, Ste 110, Fuquay-Varina, NC 27526

## Report Summary

| SAMPLE ID          | TOTAL FILTERABLE PARTICULATE |
|--------------------|------------------------------|
| Limit of Detection | 0.2 mg                       |
| Acetone Blank      | 0.0 mg (in 144 mls)          |
| S5-M5/202-1        | 1.9 mg                       |
| S5-M5/202-2        | 1.9 mg                       |
| S5-M5/202-3        | 1.1 mg                       |

**RESOLUTION ANALYTICS, INC.**

Specialists in Air Emissions Analysis

Client: Air Control Techniques

RFA #: 2333

Method: M202

## Report Summary

| SAMPLE ID                 | Organic CPM | Inorganic CPM | Total CPM <sup>1</sup> |
|---------------------------|-------------|---------------|------------------------|
| Limit of Detection        | 0.1 mg      | 0.1 mg        | 0.2 mg                 |
| Acetone Blank             |             |               | 0.0 mg (in 144 ml)     |
| Hexane Blank              |             |               | 0.0 mg (in 70 ml)      |
| DI H <sub>2</sub> O Blank |             |               | 0.0 mg (in 146 ml)     |
| M5/202-PB                 | 1.2 mg      | 0.0 mg        | 1.2 mg                 |
| M5/202-FB                 | 1.1 mg      | 0.0 mg        | 1.1 mg                 |
| S5-M5/202-1               | 1.9 mg      | 1.3 mg        | 2.1 mg                 |
| S5-M5/202-2               | 1.9 mg      | 0.8 mg        | 1.6 mg                 |
| S5-M5/202-3               | 2.6 mg      | 1.0 mg        | 2.5 mg                 |

<sup>1</sup> Total Condensible Particulate Matter (CPM) results have been Field Blank corrected up to a maximum of 2.0 mg.



Control Techniques, P.C.

301 East Durbish Road  
Cary, North Carolina 27513

Office (919) 460-7811  
Fax (919) 460-7857

**Chain of Custody / Transmittal**

**JOB #:** 2333 **PO# -** 9034-2333

**TO:** Resolution Analytics, Inc. Attn: Jeff Coppedge (919) 346-5740

208 Technology Park Lane Suite 110

Fuquay Varina, North Carolina 27526

Samples sent by: Todd Brozell Date 3/8/19

| SAMPLE NUMBER             | COMPONENTS                                                                                                                                                                                                                        | ANALYSIS                           |
|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|
| S5-M5/202-1,2,3<br>PC5ABC | <ul style="list-style-type: none"><li>• M5 Filter</li><li>• F<math>\frac{1}{2}</math> Acetone Rinse</li><li>• B<math>\frac{1}{2}</math> Acetone/Hexane Rinse</li><li>• CPM Filter</li><li>• Impinger Catch and DI Rinse</li></ul> | Total Particulate by Methods 5/202 |
| M5/202-FB<br>Field Blank  | <ul style="list-style-type: none"><li>• B<math>\frac{1}{2}</math> Acetone/Hexane Rinse</li><li>• CPM Filter</li><li>• Impinger Catch and DI Rinse</li></ul>                                                                       | Total Particulate by Methods 5/202 |
| M5/202-PB<br>Proof Blank  | <ul style="list-style-type: none"><li>• B<math>\frac{1}{2}</math> Acetone/Hexane Rinse</li><li>• CPM Filter</li><li>• Impinger Catch and DI Rinse</li></ul>                                                                       | Total Particulate by Methods 5/202 |
| Blanks                    | <ul style="list-style-type: none"><li>• Acetone Blank M5</li><li>• Hexane Blank M202</li><li>• DI H<sub>2</sub>O Blank M202</li></ul>                                                                                             | Total Particulate by Methods 5/202 |

Five Day Turnaround  
Results by 3/15/19

Relinquished by: *Todd Brozell* Date 3/8/19

Received by: *Jeffrey S. Copple* Date 3/8/19

*send results to David & John*



Client: Air Control Techniques  
RFA #: 2333  
Date Received: 3/8/19  
Date Analyzed: 3/8/19  
Analyst: JSC  
Analysis: EPA M5  
Analyte(s): Filterable PM

## Analytical Narrative

---

### Sample Matrix & Components:

Dry Filters, Front<sup>1</sup>/<sub>2</sub> Acetone Rinses, Acetone Blank

### Summary of Sample Prep:

The acetone rinses were transferred to pre-tared teflon "baggies" in a low humidity environment. The acetone rinses were evaporated then desiccated for 24 hours, after which time they were weighed daily every six hours until consecutive weights agreed within  $\pm 0.5$  mg. The filters were baked 2 to 3 hours at 105° C, cooled in a desiccator and weighed.

All weights were recorded to the nearest 0.1 mg and include filterable particulate catch only. The acetone blank catch has been subtracted from sample rinse catches in proportion with their respective volumes.

### Summary of Instrumentation:

Denver model Pinnacle Series analytical balance

**Analytical Detection Limit(s):** 0.1 mg per fraction

**Miscellaneous Comments Regarding Sample Analysis:** (Note unusual catch weights, interferences, odd sample behavior, and steps taken to confirm unusual results. Also note any deviations from standard analytical procedures, together with justification and possible affect on results. Specify samples when applicable.)

No modifications to EPA Method 5 analytical procedure were made. See data sheets for individual sample descriptions.

**PARTICULATE SAMPLING LABORATORY RESULTS**

|                                         |  |             |           |                    |           |             |           |
|-----------------------------------------|--|-------------|-----------|--------------------|-----------|-------------|-----------|
| Client: <b>Air Control Techniques</b>   |  |             |           | RFA #: <b>2333</b> |           |             |           |
| Method: EPA M5                          |  |             |           |                    |           |             |           |
| <b>Run Number</b>                       |  | S5-M5/202-1 |           | S5-M5/202-2        |           | S5-M5/202-3 |           |
| Filter Container #                      |  |             |           |                    |           |             |           |
| <u>Date</u>                             |  | <u>Init</u> |           | <u>Date</u>        |           | <u>Date</u> |           |
| 3/11/19                                 |  | JSC         | 0.4410    | 3/11/19            | 0.4562    | 3/11/19     | 0.4498    |
| Baggie Tare Wt., g.                     |  |             | 0.0000    |                    | 0.0000    |             | 0.0000    |
| Filter Tare Wt., g.                     |  | 83Q-14973   | 0.4413    | 83Q-14974          | 0.4565    | 83Q-14977   | 0.4499    |
| FILTER SAMPLE WT., g.                   |  |             | -0.0003 * |                    | -0.0003 * |             | -0.0001 * |
| *Filter Fragments In Rinse(Yes, No)?    |  |             | NO        |                    | NO        |             | NO        |
| Front ½ Rinse Container #               |  |             |           |                    |           |             |           |
| <u>Date</u>                             |  | <u>Init</u> | 182       | <u>Date</u>        | 2380      | <u>Date</u> | 3820      |
| 3/12/19                                 |  | JSC F       | 3.6050    | 3/12/19 F          | 3.2566    | 3/12/19 F   | 3.6274    |
| 3/11/19                                 |  | JSC         | 3.6055    | 3/11/19            | 3.2570    | 3/11/19     | 3.6277    |
| Tare Wt., g.                            |  | ( 160 ml)   | 3.6031    | ( 110 ml)          | 3.2547    | ( 110 ml)   | 3.6263    |
| RINSE SAMPLE WT., g.                    |  |             | 0.0019    |                    | 0.0019    |             | 0.0011    |
| Filter Catch, mg. 0.0 ** 0.0 ** 0.0 **  |  |             |           |                    |           |             |           |
| Rinse Catch, mg. 1.9 1.9 1.1            |  |             |           |                    |           |             |           |
| Rinse Blank Residue, mg. 0.0 0.0 0.0    |  |             |           |                    |           |             |           |
| Net Rinse Catch, mg. 1.9 1.9 1.1        |  |             |           |                    |           |             |           |
| FILTERABLE PARTICULATE, mg. 1.9 1.9 1.1 |  |             |           |                    |           |             |           |
| **Negative results adjusted to zero.    |  |             |           |                    |           |             |           |

**Legend:** F = Final Weight

Notes &amp; Comments: No visible catch on filters.

**REAGENT BLANK LABORATORY RESULTS****Client: Air Control Techniques**  
Method: EPA M5**RFA #: 2333****Run Number**

Acetone Blank

Sample ID/Container #

2313

Date

Init

3/12/19

JSC

F

3.4515

3/11/19

JSC

3.4518

Tare Wt., g.

(

144

ml)

3.4515

SAMPLE WT., g.

0.0000

Blank Beaker # 2313

Final wt., mg. 3.4515

Tare wt., mg. 3.4515

Residue, mg. 0.0

Volume, ml. 144

Density, mg/ml 785.0

Conc., mg/mg 0.00E+00 ✓

Upper Limit, mg 1.00E-05

**Legend:** F = Final Weight

Notes &amp; Comments:





Client: Air Control Techniques  
RFA #: 2333  
Date Received: 3/8/19  
Date Analyzed: 3/8/19  
Analyst: JSC  
Analysis: M202  
Analyte(s): Condensable PM

## Analytical Narrative

---

### Sample Matrix & Components:

H<sub>2</sub>O liquid impinger samples, organic impinger rinses, CPM filter, reagent blanks

### Summary of Sample Prep and Analysis:

The samples were received in the lab at a temperature of less than 85° F, and logged in our custody records. The teflon filters were each sonicated/extracted 3 times with DI H<sub>2</sub>O, then 3 times with hexane. The extract was added to the appropriate sample fraction. The impinger contents were extracted 3 times with hexane and the extracts were combined with the organic rinses, then evaporated in pretared teflon baggies. The water fraction was evaporated in pretared teflon baggies to near dryness at 105° C, then at ambient until completely dry. When needed, the water fractions were resuspended in 50 mls DI H<sub>2</sub>O, titrated with 0.1 N NH<sub>4</sub>OH until acid neutralization, and then evaporated using the same procedure as before. Samples were then desiccated for 24 hours and weighed at a minimum of 6 hour intervals to constant weight. All weights were recorded to the nearest 0.1 mg. Where field blanks have been provided, samples have been blank corrected up to a maximum of 2.0 mg.

### Summary of Instrumentation:

Denver model Pinnacle Series analytical balance

**Analytical Detection Limit(s):** 0.1 mg per fraction

**Miscellaneous Comments Regarding Sample Analysis:** (Note unusual catch weights, interferences, odd sample behavior, and steps taken to confirm unusual results. Also note any deviations from standard analytical procedures, together with justification and possible affect on results. Specify samples when applicable).

No modifications to M202 analytical procedure were made. See data sheets for individual sample notes and comments.



**CONDENSIBLE PARTICULATE MATTER LABORATORY RESULTS**

|                                                       |  |             |  |                    |  |             |  |
|-------------------------------------------------------|--|-------------|--|--------------------|--|-------------|--|
| Client: <b>Air Control Techniques</b><br>Method: M202 |  |             |  | RFA #: <b>2333</b> |  |             |  |
| Run Number                                            |  | S5-M5/202-1 |  | S5-M5/202-2        |  | S5-M5/202-3 |  |

|                            |      |      |      |      |      |      |      |
|----------------------------|------|------|------|------|------|------|------|
| Acetone/Hexane Container # |      |      | 3129 |      | 2573 |      | 2324 |
|                            | Date | Init |      | Date |      | Date |      |

|                      |         |     |   |        |         |   |        |         |   |        |
|----------------------|---------|-----|---|--------|---------|---|--------|---------|---|--------|
|                      | 3/12/19 | JSC | F | 3.6569 | 3/12/19 | F | 3.6121 | 3/12/19 | F | 3.5819 |
|                      | 3/11/19 | JSC |   | 3.6572 | 3/11/19 |   | 3.6124 | 3/11/19 |   | 3.5820 |
| Tare Wt., g.         |         |     |   | 3.6550 |         |   | 3.6102 |         |   | 3.5793 |
| RINSE SAMPLE WT., g. |         |     |   | 0.0019 |         |   | 0.0019 |         |   | 0.0026 |

|                                 |      |      |     |      |      |      |      |
|---------------------------------|------|------|-----|------|------|------|------|
| DI H <sub>2</sub> O Container # |      |      | 853 |      | 2744 |      | 3359 |
|                                 | Date | Init |     | Date |      | Date |      |

|                      |         |     |   |        |         |   |        |         |   |        |
|----------------------|---------|-----|---|--------|---------|---|--------|---------|---|--------|
|                      | 3/12/19 | JSC | F | 3.6692 | 3/12/19 | F | 3.6850 | 3/12/19 | F | 3.7220 |
|                      | 3/11/19 | JSC |   | 3.6696 | 3/11/19 |   | 3.6851 | 3/11/19 |   | 3.7224 |
| Tare Wt., g.         |         |     |   | 3.6679 |         |   | 3.6842 |         |   | 3.7210 |
| RINSE SAMPLE WT., g. |         |     |   | 0.0013 |         |   | 0.0008 |         |   | 0.0010 |

|                                                |      |      |      |
|------------------------------------------------|------|------|------|
| Organic CPM Mass, mg.                          | 1.9  | 1.9  | 2.6  |
| Inorganic CPM Mass, mg                         | 1.3  | 0.8  | 1.0  |
| Volume of NH <sub>4</sub> OH Added (N=0.1), ml |      |      |      |
| Correction For NH <sub>3</sub> Added, mg       | 0.00 | 0.00 | 0.00 |
| Adjusted Inorganic CPM Mass, mg                | 1.3  | 0.8  | 1.0  |
| Total CPM Mass, mg *                           | 2.1  | 1.6  | 2.5  |

\* Total CPM Mass results have been Field Train Blank corrected up to a maximum of 2.0 mg.

Notes &amp; Comments:

**FIELD TRAIN BLANK LABORATORY RESULTS**

|                                                       |                    |
|-------------------------------------------------------|--------------------|
| Client: <b>Air Control Techniques</b><br>Method: M202 | RFA #: <b>2333</b> |
| Run Number                                            | M5/202-PB          |

Acetone/Hexane Container # 2393

|      |      |
|------|------|
|      |      |
| Date | Init |

|                      |         |     |   |        |  |
|----------------------|---------|-----|---|--------|--|
|                      | 3/12/19 | JSC | F | 3.3950 |  |
|                      | 3/11/19 | JSC |   | 3.3953 |  |
| Tare Wt., g.         |         |     |   | 3.3938 |  |
| RINSE SAMPLE WT., g. |         |     |   | 0.0012 |  |

DI H<sub>2</sub>O Container # 3565

|      |      |
|------|------|
|      |      |
| Date | Init |

|                      |         |     |   |        |  |
|----------------------|---------|-----|---|--------|--|
|                      | 3/12/19 | JSC | F | 3.6196 |  |
|                      | 3/11/19 | JSC | F | 3.6196 |  |
| Tare Wt., g.         |         |     |   | 3.6196 |  |
| RINSE SAMPLE WT., g. |         |     |   | 0.0000 |  |

|                                                |      |
|------------------------------------------------|------|
| Organic CPM Mass, mg.                          | 1.2  |
| Inorganic CPM Mass, mg                         | 0.0  |
| Volume of NH <sub>4</sub> OH Added (N=0.1), ml |      |
| Correction For NH <sub>3</sub> Added, mg       | 0.00 |
| Adjusted Inorganic CPM Mass, mg                | 0.0  |
| Total Proof Blank CPM Mass, mg                 | 1.2  |

Notes &amp; Comments:

**FIELD TRAIN BLANK LABORATORY RESULTS**

|                                                       |           |                    |
|-------------------------------------------------------|-----------|--------------------|
| Client: <b>Air Control Techniques</b><br>Method: M202 |           | RFA #: <b>2333</b> |
| Run Number                                            | M5/202-FB |                    |

Acetone/Hexane Container # 2140

|      |      |
|------|------|
| Date | Init |
|------|------|

|                      |         |     |   |        |
|----------------------|---------|-----|---|--------|
|                      | 3/12/19 | JSC | F | 3.7691 |
|                      | 3/11/19 | JSC |   | 3.7694 |
| Tare Wt., g.         |         |     |   | 3.7680 |
| RINSE SAMPLE WT., g. |         |     |   | 0.0011 |

DI H<sub>2</sub>O Container # 3017

|      |      |
|------|------|
| Date | Init |
|------|------|

|                      |         |     |   |        |
|----------------------|---------|-----|---|--------|
|                      | 3/12/19 | JSC | F | 3.5917 |
|                      | 3/11/19 | JSC | F | 3.5917 |
| Tare Wt., g.         |         |     |   | 3.5917 |
| RINSE SAMPLE WT., g. |         |     |   | 0.0000 |

|                                                |            |
|------------------------------------------------|------------|
| <b>Organic CPM Mass, mg.</b>                   | <b>1.1</b> |
| <b>Inorganic CPM Mass, mg</b>                  | <b>0.0</b> |
| Volume of NH <sub>4</sub> OH Added (N=0.1), ml |            |
| Correction For NH <sub>3</sub> Added, mg       | 0.00       |
| <b>Adjusted Inorganic CPM Mass, mg</b>         | <b>0.0</b> |
| <b>Total Field Train Blank CPM Mass, mg</b>    | <b>1.1</b> |

Notes &amp; Comments:

## FIELD REAGENT BLANK LABORATORY RESULTS

|                                                       |         |                    |                     |
|-------------------------------------------------------|---------|--------------------|---------------------|
| Client: <b>Air Control Techniques</b><br>Method: M202 |         | RFA #: <b>2333</b> |                     |
| Run Number                                            | Acetone | Hexane             | DI H <sub>2</sub> O |

|             |      |      |  |      |  |      |
|-------------|------|------|--|------|--|------|
| Container # |      | 2313 |  | 4014 |  | 2848 |
|             | Date | Init |  | Date |  | Date |

|                |         |       |     |        |         |     |        |         |        |
|----------------|---------|-------|-----|--------|---------|-----|--------|---------|--------|
|                | 3/12/19 | JSC   | F   | 3.4515 | 3/12/19 | F   | 3.6513 | 3/12/19 | 3.6479 |
|                | 3/11/19 | JSC   |     | 3.4518 | 3/11/19 | F   | 3.6513 | 3/11/19 | F      |
| Tare Wt., g.   |         | ( 144 | ml) | 3.4515 | ( 70    | ml) | 3.6513 | ( 146   | ml)    |
| SAMPLE WT., g. |         |       |     | 0.0000 |         |     | 0.0000 |         | 0.0000 |

|                                                 |          |          |          |
|-------------------------------------------------|----------|----------|----------|
| <b>Field Reagent Blank Mass, mg</b>             | 0.0      | 0.0      | 0.0      |
| <b>Field Reagent Blank Concentration, mg/mg</b> | 0.00E+00 | 0.00E+00 | 0.00E+00 |

Notes & Comments:

✓

RFA #: 2333  
Method: 5

Date Received: 3/8/19  
Date Analyzed: 3/8/19

[illegible]

QT ✓

Date Received: 3/8/19  
Date Analyzed: 3/8/19

[illegible]

**APPENDIX III-C**  
**CEMs Data Sheets**

| Enviva - Greenwood             |                                            | RCO 1 (South) |             |             |             |
|--------------------------------|--------------------------------------------|---------------|-------------|-------------|-------------|
| Parameters                     | Units                                      | Run 1         | Run 2       | Run 3       | Average     |
| Date                           |                                            | 7-Mar-19      | 7-Mar-19    | 7-Mar-19    |             |
| Run Time                       |                                            | 0910-1015     | 1108-1222   | 1304-1418   |             |
| Oxygen                         | %                                          | 20.70         | 20.70       | 20.53       | 20.64       |
| Moisture                       | %                                          | 5.97          | 6.34        | 7.02        | 6.44        |
| Volumetric Flow Rate, Std      | DSCFM                                      | 32,231        | 31,820      | 30,659      | 31,570      |
| Pellet Moisture Content        | %                                          | 5.16          | 4.69        | 4.14        | 4.66        |
| Process Rate                   | ODT/hr                                     | 39.5          | 40.3        | 40.5        | 40.1        |
| VOC Emissions                  | Units                                      | Run 1         | Run 2       | Run 3       | Average     |
| Concentration (actual)         | ppmv <sub>w</sub> as C <sub>3</sub>        | 5.19          | 4.48        | 8.85        | 6.17        |
| Concentration (dry)            | ppmv <sub>d</sub> as C <sub>3</sub>        | 5.52          | 4.78        | 9.52        | 6.61        |
| Emission Factor (propane)      | lb/ODT as C <sub>3</sub> H <sub>8</sub>    | 0.031         | 0.026       | 0.049       | 0.035       |
| <b>Emission Rate (propane)</b> | <b>lb/hr as C<sub>3</sub>H<sub>8</sub></b> | <b>1.2</b>    | <b>1.0</b>  | <b>2.0</b>  | <b>1.4</b>  |
| NOx Emissions                  | Units                                      | Run 1         | Run 2       | Run 3       | Average     |
| Concentration (dry)            | ppm <sub>vd</sub>                          | 1.03          | 1.21        | 1.16        | 1.13        |
| Emission Factor                | lb/ODT                                     | 0.0060        | 0.0069      | 0.0063      | 0.0064      |
| <b>Emission Rate</b>           | <b>lb/hr</b>                               | <b>0.24</b>   | <b>0.28</b> | <b>0.26</b> | <b>0.26</b> |
| CO Emissions                   | Units                                      | Run 1         | Run 2       | Run 3       | Average     |
| Concentration (dry)            | ppm <sub>vd</sub>                          | 16.68         | 17.93       | 16.73       | 17.11       |
| Emission Factor                | lb/ODT                                     | 0.059         | 0.062       | 0.055       | 0.059       |
| <b>Emission Rate</b>           | <b>lb/hr</b>                               | <b>2.3</b>    | <b>2.5</b>  | <b>2.2</b>  | <b>2.4</b>  |



Facility: Enviva - Greenwood  
Date: 3/7/19

Source: RCO 1 (South)

| HAP             |                 | Methanol          | Acetaldehyde        | Formaldehyde      | HCl                           |                 |
|-----------------|-----------------|-------------------|---------------------|-------------------|-------------------------------|-----------------|
| Formula         |                 | CH <sub>4</sub> O | CH <sub>3</sub> CHO | CH <sub>2</sub> O | C <sub>6</sub> H <sub>6</sub> |                 |
| Mol Weight      | lb/lb mole      | 32.04             | 44.05               | 30.31             | 36.46                         |                 |
| Response Factor |                 | 0.65              | 1.00                | 0.00              | 0.00                          |                 |
| <b>Run 1</b>    |                 |                   |                     |                   |                               |                 |
| Conc            | ppm wet         | 0.00              | 0.00                | 0.00              | 0.00                          |                 |
| Conc            | ppm dry         | 0.00              | 0.00                | 0.00              | 0.00                          | 5.97 % Moisture |
| Mass Emissions  | lb/hr           | 0.00              | 0.00                | 0.00              | 0.00                          | 32,231 DSCFM    |
| Emission Factor | lb/ton material | 0.00              | 0.00                | 0.00              | 0.00                          | 39.5 ODT/hr     |
| <b>Run 2</b>    |                 |                   |                     |                   |                               |                 |
| Conc            | ppm wet         | 0.00              | 0.00                | 0.00              | 0.00                          |                 |
| Conc            | ppm dry         | 0.00              | 0.00                | 0.00              | 0.00                          | 6.34 % Moisture |
| Mass Emissions  | lb/hr           | 0.00              | 0.00                | 0.00              | 0.00                          | 31,820 DSCFM    |
| Emission Factor | lb/ton material | 0.00              | 0.00                | 0.00              | 0.00                          | 40.3 ODT/hr     |
| <b>Run 3</b>    |                 |                   |                     |                   |                               |                 |
| Conc            | ppm wet         | 0.19              | 0.00                | 0.00              | 0.00                          |                 |
| Conc            | ppm dry         | 0.20              | 0.00                | 0.00              | 0.00                          | 7.02 % Moisture |
| Mass Emissions  | lb/hr           | 0.031             | 0.00                | 0.00              | 0.00                          | 30,659 DSCFM    |
| Emission Factor | lb/ton material | 0.00077           | 0.00                | 0.00              | 0.00                          | 40.5 ODT/hr     |
| <b>Averages</b> |                 |                   |                     |                   |                               |                 |
| Conc            | ppm wet         | 0.06              | 0.00                | 0.00              | 0.00                          |                 |
| Conc            | ppm dry         | 0.07              | 0.00                | 0.00              | 0.00                          | 6.44 % Moisture |
| Mass Emissions  | lb/hr           | 0.010             | 0.00                | 0.00              | 0.00                          | 31,570 DSCFM    |
| Emission Factor | lb/ton material | 0.00026           | 0.00                | 0.00              | 0.00                          |                 |
| ND values       |                 |                   |                     |                   |                               |                 |

Enviva - Greenwood  
RCO 1 (South)

Date: 7-Mar-19  
Run Time: 0910-1015

Run 1

| Parameter                                                     | Symbol                 | O <sub>2</sub><br>% | CO <sub>2</sub><br>% | CO<br>ppm    | NOx<br>ppm  | THC<br>ppm (as C <sub>3</sub> H <sub>8</sub> ) |
|---------------------------------------------------------------|------------------------|---------------------|----------------------|--------------|-------------|------------------------------------------------|
| <b>Analyzer Calibration Error - Calibration Standards</b>     |                        |                     |                      |              |             |                                                |
| Zero Gas                                                      | $C_{v, zero}$          | 0.0                 | 0.0                  | 0.0          | 0.0         | 0.0                                            |
| Low-Level Gas                                                 | $C_{v, low}$           | N/A                 | N/A                  | N/A          | N/A         | 25.74                                          |
| Mid-Level Gas                                                 | $C_{v, mid}$           | 11.05               | 9.952                | 46.1         | 49.8        | 50.18                                          |
| High-Level Gas                                                | $C_{v, high}$          | 21.80               | 18.20                | 89.5         | 89.5        | 85.84                                          |
| Calibration Span                                              | CS                     | 21.80               | 18.20                | 89.5         | 89.5        | 100                                            |
| <b>Analyzer Calibration Error - Instrument Response</b>       |                        |                     |                      |              |             |                                                |
| Zero Gas                                                      | $C_{Dir, zero}$        | -0.01               | 0.00                 | -0.03        | 0.1         | 0.1                                            |
| Low-Level Gas                                                 | $C_{Dir, low}$         | N/A                 | N/A                  | N/A          | N/A         | 27.3                                           |
| Mid-Level Gas                                                 | $C_{Dir, mid}$         | 11.005              | 10.058               | 45.6         | 49.5        | 49.85                                          |
| High-Level Gas                                                | $C_{Dir, high}$        | 21.73               | 18.12                | 89.5         | 89.5        | 85.75                                          |
| <b>Analyzer Calibration Error - Results (Percent of Span)</b> |                        |                     |                      |              |             |                                                |
| Zero Gas                                                      | $ACE_{zero}$           | -0.1                | 0.0                  | 0.0          | 0.1         | 0.1                                            |
| Low-Level Gas                                                 | $ACE_{low}$            | N/A                 | N/A                  | N/A          | N/A         | 6.1                                            |
| Mid-Level Gas                                                 | $ACE_{mid}$            | -0.2                | 0.6                  | -0.6         | -0.3        | -0.7                                           |
| High-Level Gas                                                | $ACE_{high}$           | -0.3                | -0.4                 | 0.0          | 0.0         | -0.1                                           |
| Specification                                                 | $ACE_{spec}$           | ±2                  | ±2                   | ±2           | ±2          | ±5                                             |
| <b>System Calibrations - Instrument Response</b>              |                        |                     |                      |              |             |                                                |
| Initial Zero                                                  | $C_{s, zero (pre)}$    | 0.02                | -0.01                | 0.01         | -0.1        | -0.3                                           |
| Final Zero                                                    | $C_{s, zero (post)}$   | 0.06                | 0.00                 | 0.9          | -0.4        | -0.6                                           |
| Upscale Gas Standard                                          | $C_{MA}$               | 21.80               | 18.20                | 46.1         | 49.8        | 50.2                                           |
| Initial Upscale                                               | $C_{v, up (pre)}$      | 21.66               | 17.82                | 47.8         | 49.7        | 50                                             |
| Final Upscale                                                 | $C_{v, up (post)}$     | 21.722              | 17.99                | 47.23        | 47.8        | 50.14                                          |
| <b>System Bias - Results (Percent)</b>                        |                        |                     |                      |              |             |                                                |
| Zero (pre)                                                    | $SB_{i (zero)}$        | 0.1                 | 0.0                  | 0.0          | -0.1        | -0.4                                           |
| Zero (post)                                                   | $SB_{final (zero)}$    | 0.3                 | 0.0                  | 1.0          | -0.5        | -0.7                                           |
| Upscale (pre)                                                 | $SB_{i (upscale)}$     | -0.3                | -1.6                 | 2.5          | 0.2         | 0.1                                            |
| Upscale (post)                                                | $SB_{final (upscale)}$ | -0.1                | -0.7                 | 1.8          | -1.9        | 0.3                                            |
| Specification                                                 | $SB_{spec}$            | ±5                  | ±5                   | ±5           | ±5          | NA                                             |
| <b>System Drift - Results (Percent)</b>                       |                        |                     |                      |              |             |                                                |
| Zero                                                          | $D_{zero}$             | 0.2                 | 0.0                  | 1.0          | 0.4         | -0.3                                           |
| Upscale                                                       | $D_{upscale}$          | 0.3                 | 0.9                  | 0.6          | 2.1         | 0.1                                            |
| Specification                                                 | $D_{spec}$             | ±3                  | 3.0                  | 3.0          | 3.0         | ±3                                             |
| <b>Response Test - Results (seconds)</b>                      |                        |                     |                      |              |             |                                                |
| Upscale Test                                                  |                        | 35                  | 40                   | 30           | 35          | NA                                             |
| Zero Test                                                     |                        | 35                  | 35                   | 30           | 35          | NA                                             |
| Response Time                                                 |                        | 35                  | 40                   | 30           | 35          | 25                                             |
| <b>Calibration Correction</b>                                 |                        |                     |                      |              |             |                                                |
| Raw Average                                                   | $C_{ave}$              | 20.60               | 0.00                 | 17.48        | 0.79        | 5.19                                           |
| Bias Average - Zero                                           | $C_0$                  | 0.04                | 0.00                 | 0.46         | -0.22       | N/A                                            |
| Bias Average - Upscale                                        | $C_M$                  | 21.69               | 17.90                | 47.52        | 48.75       | N/A                                            |
| Corrected Run Average                                         | $C_{Gas}$              | <b>20.70</b>        | <b>0.00</b>          | <b>16.68</b> | <b>1.03</b> | <b>5.19</b>                                    |

Enviva - Greenwood  
RCO 1 (South)

Date: 7-Mar-19  
Run Time: 1108-1222

Run 2

| Parameter                                                     | Symbol                 | O <sub>2</sub><br>% | CO <sub>2</sub><br>% | CO<br>ppm    | NOx<br>ppm  | THC<br>ppm (as C <sub>3</sub> H <sub>8</sub> ) |
|---------------------------------------------------------------|------------------------|---------------------|----------------------|--------------|-------------|------------------------------------------------|
| <b>Analyzer Calibration Error - Calibration Standards</b>     |                        |                     |                      |              |             |                                                |
| Zero Gas                                                      | $C_{v, zero}$          | 0.0                 | 0.0                  | 0.0          | 0.0         | 0.0                                            |
| Low-Level Gas                                                 | $C_{v, low}$           | N/A                 | N/A                  | N/A          | N/A         | 25.7                                           |
| Mid-Level Gas                                                 | $C_{v, mid}$           | 11.1                | 10.0                 | 46.1         | 49.8        | 50.2                                           |
| High-Level Gas                                                | $C_{v, high}$          | 21.8                | 18.2                 | 89.5         | 89.5        | 85.8                                           |
| Calibration Span                                              | CS                     | 21.8                | 18.2                 | 89.5         | 89.5        | 100                                            |
| <b>Analyzer Calibration Error - Instrument Response</b>       |                        |                     |                      |              |             |                                                |
| Zero Gas                                                      | $C_{Dir, zero}$        | 0.0                 | 0.0                  | 0.0          | 0.1         | 0.1                                            |
| Low-Level Gas                                                 | $C_{Dir, low}$         | N/A                 | N/A                  | N/A          | N/A         | 27.3                                           |
| Mid-Level Gas                                                 | $C_{Dir, mid}$         | 11.0                | 10.1                 | 45.6         | 49.5        | 49.9                                           |
| High-Level Gas                                                | $C_{Dir, high}$        | 21.7                | 18.1                 | 89.5         | 89.5        | 85.8                                           |
| <b>Analyzer Calibration Error - Results (Percent of Span)</b> |                        |                     |                      |              |             |                                                |
| Zero Gas                                                      | $ACE_{zero}$           | -0.1                | 0.0                  | 0.0          | 0.1         | 0.1                                            |
| Low-Level Gas                                                 | $ACE_{low}$            | N/A                 | N/A                  | N/A          | N/A         | 6.1                                            |
| Mid-Level Gas                                                 | $ACE_{mid}$            | -0.2                | 0.6                  | -0.6         | -0.3        | -0.7                                           |
| High-Level Gas                                                | $ACE_{high}$           | -0.3                | -0.4                 | 0.0          | 0.0         | -0.1                                           |
| Specification                                                 | $ACE_{spec}$           | ±2                  | ±2                   | ±2           | ±2          | ±5                                             |
| <b>System Calibrations - Instrument Response</b>              |                        |                     |                      |              |             |                                                |
| Initial Zero                                                  | $C_{s, zero (pre)}$    | 0.06                | 0.00                 | 0.90         | -0.39       | -0.60                                          |
| Final Zero                                                    | $C_{s, zero (post)}$   | 0.129               | 0.00                 | 0.5          | 0.02        | -0.2                                           |
| Upscale Gas Standard                                          | $C_{MA}$               | 21.80               | 18.20                | 46.1         | 49.8        | 50.2                                           |
| Initial Upscale                                               | $C_{v, up (pre)}$      | 21.722              | 17.985               | 47.23        | 47.8        | 50.14                                          |
| Final Upscale                                                 | $C_{v, up (post)}$     | 21.651              | 17.7                 | 47.94        | 48.98       | 50.6                                           |
| <b>System Bias - Results (Percent)</b>                        |                        |                     |                      |              |             |                                                |
| Zero (pre)                                                    | $SB_i (zero)$          | 0.3                 | 0.0                  | 1.0          | -0.5        | -0.7                                           |
| Zero (post)                                                   | $SB_{final} (zero)$    | 0.6                 | 0.0                  | 0.6          | 0.0         | -0.3                                           |
| Upscale (pre)                                                 | $SB_i (upscale)$       | -0.1                | -0.7                 | 1.8          | -1.9        | 0.3                                            |
| Upscale (post)                                                | $SB_{final} (upscale)$ | -0.4                | -2.3                 | 2.6          | -0.6        | 0.8                                            |
| Specification                                                 | $SB_{spec}$            | ±5                  | ±5                   | ±5           | ±5          | NA                                             |
| <b>System Drift - Results (Percent)</b>                       |                        |                     |                      |              |             |                                                |
| Zero                                                          | $D_{zero}$             | 0.3                 | 0.0                  | 0.4          | 0.5         | 0.4                                            |
| Upscale                                                       | $D_{upscale}$          | 0.3                 | 1.6                  | 0.8          | 1.3         | 0.5                                            |
| Specification                                                 | $D_{spec}$             | ±3                  | 3.0                  | 3.0          | 3.0         | ±3                                             |
| <b>Response Test - Results (seconds)</b>                      |                        |                     |                      |              |             |                                                |
| Upscale Test                                                  |                        | 35                  | 40                   | 30           | 35          | NA                                             |
| Zero Test                                                     |                        | 35                  | 35                   | 30           | 35          | NA                                             |
| Response Time                                                 |                        | 35                  | 40                   | 30           | 35          | 25                                             |
| <b>Calibration Correction</b>                                 |                        |                     |                      |              |             |                                                |
| Raw Average                                                   | $C_{ave}$              | 20.60               | 0.00                 | 18.94        | 1.00        | 4.48                                           |
| Bias Average - Zero                                           | $C_0$                  | 0.09                | 0.00                 | 0.70         | -0.19       | N/A                                            |
| Bias Average - Upscale                                        | $C_M$                  | 21.69               | 17.84                | 47.59        | 48.39       | N/A                                            |
| Corrected Run Average                                         | $C_{Gas}$              | <b>20.70</b>        | <b>0.00</b>          | <b>17.93</b> | <b>1.21</b> | <b>4.48</b>                                    |

Enviva - Greenwood  
RCO 1 (South)

Date: 7-Mar-19  
Run Time: 1304-1418

Run 3

| Parameter                                                     | Symbol                 | O <sub>2</sub><br>% | CO <sub>2</sub><br>% | CO<br>ppm    | NOx<br>ppm  | THC<br>ppm (as C <sub>3</sub> H <sub>8</sub> ) |
|---------------------------------------------------------------|------------------------|---------------------|----------------------|--------------|-------------|------------------------------------------------|
| <b>Analyzer Calibration Error - Calibration Standards</b>     |                        |                     |                      |              |             |                                                |
| Zero Gas                                                      | $C_{v, zero}$          | 0.0                 | 0.0                  | 0.0          | 0.0         | 0.0                                            |
| Low-Level Gas                                                 | $C_{v, low}$           | N/A                 | N/A                  | N/A          | N/A         | 25.7                                           |
| Mid-Level Gas                                                 | $C_{v, mid}$           | 11.1                | 10.0                 | 46.1         | 49.8        | 50.2                                           |
| High-Level Gas                                                | $C_{v, high}$          | 21.8                | 18.2                 | 89.5         | 89.5        | 85.8                                           |
| Calibration Span                                              | CS                     | 21.80               | 18.20                | 89.5         | 89.5        | 100.0                                          |
| <b>Analyzer Calibration Error - Instrument Response</b>       |                        |                     |                      |              |             |                                                |
| Zero Gas                                                      | $C_{Dir, zero}$        | 0.0                 | 0.0                  | 0.0          | 0.1         | 0.10                                           |
| Low-Level Gas                                                 | $C_{Dir, low}$         | N/A                 | N/A                  | N/A          | N/A         | 27.3                                           |
| Mid-Level Gas                                                 | $C_{Dir, mid}$         | 11.0                | 10.1                 | 45.6         | 49.5        | 49.9                                           |
| High-Level Gas                                                | $C_{Dir, high}$        | 21.7                | 18.1                 | 89.5         | 89.5        | 85.8                                           |
| <b>Analyzer Calibration Error - Results (Percent of Span)</b> |                        |                     |                      |              |             |                                                |
| Zero Gas                                                      | $ACE_{zero}$           | -0.1                | 0.0                  | 0.0          | 0.1         | 0.1                                            |
| Low-Level Gas                                                 | $ACE_{low}$            | N/A                 | N/A                  | N/A          | N/A         | 6.1                                            |
| Mid-Level Gas                                                 | $ACE_{mid}$            | -0.2                | 0.6                  | -0.6         | -0.3        | -0.7                                           |
| High-Level Gas                                                | $ACE_{high}$           | -0.3                | -0.4                 | 0.0          | 0.0         | -0.1                                           |
| Specification                                                 | $ACE_{spec}$           | ±2                  | ±2                   | ±2           | ±2          | ±5                                             |
| <b>System Calibrations - Instrument Response</b>              |                        |                     |                      |              |             |                                                |
| Initial Zero                                                  | $C_{s, zero (pre)}$    | 0.13                | 0.00                 | 0.50         | 0.02        | -0.20                                          |
| Final Zero                                                    | $C_{s, zero (post)}$   | 0.025               | 0.00                 | 0.37         | -0.09       | -0.45                                          |
| Upscale Gas Standard                                          | $C_{MA}$               | 21.80               | 18.20                | 46.1         | 49.8        | 50.2                                           |
| Initial Upscale                                               | $C_{v, up (pre)}$      | 21.651              | 17.7                 | 47.94        | 48.98       | 50.6                                           |
| Final Upscale                                                 | $C_{v, up (post)}$     | 21.755              | 17.94                | 47.31        | 49.16       | 49.1                                           |
| <b>System Bias - Results (Percent)</b>                        |                        |                     |                      |              |             |                                                |
| Zero (pre)                                                    | $SB_i (zero)$          | 0.6                 | 0.0                  | 0.6          | 0.0         | -0.3                                           |
| Zero (post)                                                   | $SB_{final} (zero)$    | 0.2                 | 0.0                  | 0.4          | -0.2        | -0.6                                           |
| Upscale (pre)                                                 | $SB_i (upscale)$       | -0.4                | -2.3                 | 2.6          | -0.6        | 0.8                                            |
| Upscale (post)                                                | $SB_{final} (upscale)$ | 0.1                 | -1.0                 | 1.9          | -0.4        | -0.8                                           |
| Specification                                                 | $SB_{spec}$            | ±5                  | ±5                   | ±5           | ±5          | NA                                             |
| <b>System Drift - Results (Percent)</b>                       |                        |                     |                      |              |             |                                                |
| Zero                                                          | $D_{zero}$             | 0.5                 | 0.0                  | 0.1          | 0.1         | -0.3                                           |
| Upscale                                                       | $D_{upscale}$          | 0.5                 | 1.3                  | 0.7          | 0.2         | -1.5                                           |
| Specification                                                 | $D_{spec}$             | ±3                  | 3.0                  | 3.0          | 3.0         | ±3                                             |
| <b>Response Test - Results (seconds)</b>                      |                        |                     |                      |              |             |                                                |
| Upscale Test                                                  |                        | 35                  | 40                   | 30           | 35          | NA                                             |
| Zero Test                                                     |                        | 35                  | 35                   | 30           | 35          | NA                                             |
| Response Time                                                 |                        | 35                  | 40                   | 30           | 35          | 25                                             |
| <b>Calibration Correction</b>                                 |                        |                     |                      |              |             |                                                |
| Raw Average                                                   | $C_{ave}$              | 20.53               | 0.01                 | 17.56        | 1.11        | 8.85                                           |
| Bias Average - Zero                                           | $C_0$                  | 0.08                | 0.00                 | 0.44         | -0.04       | N/A                                            |
| Bias Average - Upscale                                        | $C_M$                  | 21.70               | 17.82                | 47.63        | 49.07       | N/A                                            |
| Corrected Run Average                                         | $C_{Gas}$              | <b>20.53</b>        | <b>0.01</b>          | <b>16.73</b> | <b>1.16</b> | <b>8.85</b>                                    |

Test Run 1 Begin. STRATA Version 3.2.112  
 Operator: ACTPC  
 Plant Name Enviva Greenwood  
 Location: RCO 1 - Exhaust

| Start Averaging |         | O2<br>% dry | CO2<br>% dry | THC<br>ppm | NOx<br>ppm | CO<br>ppm |
|-----------------|---------|-------------|--------------|------------|------------|-----------|
| 3/7/2019        | 9:10:31 | 20.569      | 0.008        | 10.97      | 1.11       | 18.92     |
| 3/7/2019        | 9:11:31 | 20.573      | 0.01         | 3.97       | 1.06       | 19.22     |
| 3/7/2019        | 9:12:32 | 20.579      | 0.007        | 3.63       | 1.08       | 18.35     |
| 3/7/2019        | 9:13:32 | 20.585      | 0.004        | 11.71      | 1.05       | 17.97     |
| 3/7/2019        | 9:14:31 | 20.586      | 0.003        | 3.7        | 1.03       | 18.25     |
| 3/7/2019        | 9:15:32 | 20.584      | 0.002        | 2.19       | 1.08       | 17.39     |
| 3/7/2019        | 9:16:32 | 20.583      | -0.003       | 9.01       | 1.02       | 17.19     |
| 3/7/2019        | 9:17:31 | 20.581      | -0.002       | 2.66       | 1.02       | 17.47     |
| 3/7/2019        | 9:18:31 | 20.58       | -0.002       | 2.05       | 1.02       | 16.76     |
| 3/7/2019        | 9:19:32 | 20.59       | -0.001       | 9.43       | 1          | 16.72     |
| 3/7/2019        | 9:20:31 | 20.594      | 0            | 3.02       | 0.97       | 17.26     |
| 3/7/2019        | 9:21:31 | 20.597      | -0.003       | 2.68       | 0.97       | 16.75     |
| 3/7/2019        | 9:22:32 | 20.607      | 0            | 10.49      | 0.95       | 16.76     |
| 3/7/2019        | 9:23:32 | 20.601      | -0.002       | 4.42       | 0.9        | 17.23     |
| 3/7/2019        | 9:24:31 | 20.601      | 0            | 2.98       | 0.96       | 16.61     |
| 3/7/2019        | 9:25:32 | 20.588      | -0.002       | 9.44       | 0.97       | 16.6      |
| 3/7/2019        | 9:26:31 | 20.586      | 0.002        | 2.34       | 0.98       | 17.29     |
| 3/7/2019        | 9:27:31 | 20.585      | -0.003       | 1.66       | 0.99       | 17.13     |
| 3/7/2019        | 9:28:31 | 20.591      | 0            | 9.02       | 0.97       | 17.59     |
| 3/7/2019        | 9:29:32 | 20.58       | 0.005        | 2.76       | 0.94       | 18.35     |
| 3/7/2019        | 9:30:31 | 20.584      | 0.003        | 2.25       | 0.97       | 18.05     |
| 3/7/2019        | 9:31:31 | 20.59       | 0.003        | 10.75      | 0.93       | 18.12     |
| 3/7/2019        | 9:32:31 | 20.592      | 0.004        | 3.63       | 0.92       | 18.67     |
| 3/7/2019        | 9:33:31 | 20.601      | 0.003        | 3.28       | 0.97       | 18.22     |
| 3/7/2019        | 9:34:32 | 20.603      | 0.003        | 10.88      | 0.97       | 18.05     |
| 3/7/2019        | 9:35:31 | 20.586      | -0.001       | 3.22       | 0.97       | 18.51     |
| 3/7/2019        | 9:36:31 | 20.586      | 0.002        | 1.93       | 0.95       | 17.95     |
| 3/7/2019        | 9:37:31 | 20.585      | -0.001       | 9.87       | 0.9        | 17.9      |
| 3/7/2019        | 9:38:32 | 20.583      | 0.001        | 2.42       | 0.9        | 18.52     |
| 3/7/2019        | 9:39:31 | 20.586      | 0.002        | 1.65       | 0.9        | 18.11     |
| 3/7/2019        | 9:40:32 | 20.594      | -0.002       | 9.46       | 0.89       | 17.89     |
| 3/7/2019        | 9:41:31 | 20.593      | 0.004        | 3.24       | 0.88       | 18.02     |
| 3/7/2019        | 9:42:31 | 20.603      | -0.001       | 2.62       | 0.9        | 17.04     |
| 3/7/2019        | 9:43:31 | 20.615      | -0.003       | 10.15      | 0.85       | 16.45     |
| 3/7/2019        | 9:44:32 | 20.622      | -0.001       | 3.81       | 0.83       | 16.71     |
| 3/7/2019        | 9:45:31 | 20.613      | -0.003       | 3.06       | 0.81       | 16.23     |
| 3/7/2019        | 9:46:32 | 20.614      | -0.002       | 9.44       | 0.76       | 16.36     |
| 3/7/2019        | 9:47:31 | 20.605      | -0.002       | 2.76       | 0.75       | 16.99     |
| 3/7/2019        | 9:48:31 | 20.6        | -0.003       | 2          | 0.78       | 16.55     |
| 3/7/2019        | 9:49:31 | 20.605      | -0.001       | 9.23       | 0.72       | 16.58     |
| 3/7/2019        | 9:50:32 | 20.601      | -0.001       | 2.43       | 0.66       | 17.28     |
| 3/7/2019        | 9:51:31 | 20.604      | -0.002       | 1.93       | 0.66       | 17.11     |
| 3/7/2019        | 9:52:31 | 20.607      | 0.002        | 9.59       | 0.66       | 17.38     |

Test Run 1 Begin. STRATA Version 3.2.112

Operator: ACTPC

Plant Name Enviva Greenwood

Location: RCO 1 - Exhaust

|          |          | O2     | CO2    | THC   | NOx  | CO    |
|----------|----------|--------|--------|-------|------|-------|
| 3/7/2019 | 9:53:32  | 20.615 | -0.002 | 3.92  | 0.64 | 17.88 |
| 3/7/2019 | 9:54:31  | 20.616 | -0.002 | 3.49  | 0.62 | 17.28 |
| 3/7/2019 | 9:55:31  | 20.619 | 0.002  | 10.76 | 0.61 | 17.1  |
| 3/7/2019 | 9:56:31  | 20.611 | -0.001 | 3.11  | 0.55 | 17.62 |
| 3/7/2019 | 9:57:32  | 20.604 | -0.001 | 1.79  | 0.59 | 17.28 |
| 3/7/2019 | 9:58:32  | 20.607 | -0.002 | 9.22  | 0.57 | 17.43 |
| 3/7/2019 | 9:59:31  | 20.601 | -0.002 | 2.85  | 0.55 | 17.89 |
| 3/7/2019 | 10:00:32 | 20.604 | -0.002 | 2     | 0.5  | 17.18 |
| 3/7/2019 | 10:01:31 | 20.609 | -0.003 | 9.85  | 0.36 | 17.01 |
| 3/7/2019 | 10:02:32 | 20.616 | -0.002 | 2.88  | 0.25 | 17.53 |
| 3/7/2019 | 10:03:31 | 20.619 | -0.002 | 2.52  | 0.25 | 17.18 |
| 3/7/2019 | 10:04:31 | 20.63  | -0.003 | 10.09 | 0.3  | 17.14 |
| 3/7/2019 | 10:05:32 | 20.629 | -0.002 | 4.26  | 0.41 | 17.37 |
| 3/7/2019 | 10:06:31 | 20.624 | -0.003 | 3.44  | 0.5  | 16.77 |
| 3/7/2019 | 10:07:31 | 20.616 | -0.002 | 9.79  | 0.55 | 16.9  |
| 3/7/2019 | 10:08:32 | 20.606 | -0.002 | 2.39  | 0.6  | 17.7  |
| 3/7/2019 | 10:09:31 | 20.608 | -0.001 | 1.65  | 0.64 | 17.55 |
| 3/7/2019 | 10:10:32 | 20.613 | -0.003 | 9.07  | 0.66 | 17.63 |

**Test Run 2 Begin. STRATA Version 3.2.112****Operator: ACTPC****Plant Nam Enviva Greenwood****Location: RCO 1 - Exhaust**

| Start Averaging |          | O2<br>% dry | CO2<br>% dry | THC<br>ppm | NOx<br>ppm |
|-----------------|----------|-------------|--------------|------------|------------|
| 3/7/2019        | 11:12:20 | 20.608      | -0.002       | 2.07       | 1.09       |
| 3/7/2019        | 11:13:19 | 20.602      | 0.001        | 7.96       | 1.03       |
| 3/7/2019        | 11:14:20 | 20.601      | -0.002       | 1.89       | 1.04       |
| 3/7/2019        | 11:15:20 | 20.603      | -0.001       | 1.12       | 1.03       |
| 3/7/2019        | 11:16:20 | 20.61       | -0.002       | 8.23       | 1.03       |
| 3/7/2019        | 11:17:20 | 20.602      | -0.003       | 2.59       | 1          |
| 3/7/2019        | 11:18:20 | 20.619      | -0.001       | 3.59       | 1.03       |
| 3/7/2019        | 11:19:20 | 20.616      | -0.002       | 9.89       | 1.07       |
| 3/7/2019        | 11:20:19 | 20.607      | -0.001       | 3.41       | 1.06       |
| 3/7/2019        | 11:21:20 | 20.601      | 0.001        | 2.13       | 1.03       |
| 3/7/2019        | 11:22:20 | 20.598      | -0.001       | 8.36       | 1.03       |
| 3/7/2019        | 11:23:19 | 20.594      | -0.001       | 2.28       | 1          |
| 3/7/2019        | 11:24:20 | 20.59       | 0.002        | 1.14       | 1.06       |
| 3/7/2019        | 11:25:19 | 20.601      | -0.002       | 8.2        | 1.05       |
| 3/7/2019        | 11:26:20 | 20.605      | -0.002       | 3.18       | 1.03       |
| 3/7/2019        | 11:27:20 | 20.622      | -0.002       | 3.58       | 1.01       |
| 3/7/2019        | 11:28:20 | 20.636      | -0.001       | 10.37      | 0.97       |
| 3/7/2019        | 11:29:19 | 20.622      | -0.002       | 4.95       | 0.97       |
| 3/7/2019        | 11:30:20 | 20.6        | -0.001       | 1.99       | 1.02       |
| 3/7/2019        | 11:31:20 | 20.594      | 0            | 7.65       | 1.04       |
| 3/7/2019        | 11:32:20 | 20.589      | -0.002       | 1.33       | 1.03       |
| 3/7/2019        | 11:33:19 | 20.585      | -0.001       | 0.26       | 1.03       |
| 3/7/2019        | 11:34:20 | 20.593      | -0.001       | 6.99       | 1.01       |
| 3/7/2019        | 11:35:20 | 20.59       | -0.002       | 2.28       | 0.97       |
| 3/7/2019        | 11:36:20 | 20.592      | 0.001        | 1.46       | 1.02       |
| 3/7/2019        | 11:37:20 | 20.609      | -0.002       | 9.51       | 1.01       |
| 3/7/2019        | 11:38:19 | 20.623      | -0.002       | 5.04       | 0.97       |
| 3/7/2019        | 11:39:20 | 20.626      | -0.001       | 4.23       | 0.97       |
| 3/7/2019        | 11:40:20 | 20.627      | -0.002       | 10.23      | 0.93       |
| 3/7/2019        | 11:41:20 | 20.605      | -0.002       | 4.21       | 0.93       |
| 3/7/2019        | 11:42:20 | 20.594      | 0            | 1.76       | 1.02       |
| 3/7/2019        | 11:43:19 | 20.592      | -0.003       | 8          | 1.03       |
| 3/7/2019        | 11:44:20 | 20.585      | 0            | 1.85       | 1.03       |
| 3/7/2019        | 11:45:19 | 20.587      | -0.002       | 0.86       | 1.03       |
| 3/7/2019        | 11:46:20 | 20.606      | -0.003       | 9.42       | 0.98       |
| 3/7/2019        | 11:47:20 | 20.612      | -0.001       | 4.35       | 0.96       |
| 3/7/2019        | 11:48:19 | 20.607      | 0            | 3.37       | 0.97       |
| 3/7/2019        | 11:49:20 | 20.598      | -0.002       | 10.05      | 0.97       |
| 3/7/2019        | 11:50:20 | 20.591      | -0.002       | 3.46       | 0.97       |
| 3/7/2019        | 11:51:20 | 20.593      | 0            | 1.45       | 1.02       |
| 3/7/2019        | 11:52:19 | 20.582      | -0.002       | 7.5        | 1.02       |
| 3/7/2019        | 11:53:20 | 20.584      | -0.002       | 2.62       | 0.99       |
| 3/7/2019        | 11:54:20 | 20.595      | 0.004        | 2.09       | 1.03       |

**Test Run 2 Begin. STRATA Version 3.2.112****Operator: ACTPC****Plant Nam Enviva Greenwood****Location: RCO 1 - Exhaust**

|          |          | O2     | CO2    | THC   | NOx  |
|----------|----------|--------|--------|-------|------|
| 3/7/2019 | 11:55:20 | 20.592 | 0.001  | 9.23  | 0.98 |
| 3/7/2019 | 11:56:20 | 20.584 | 0      | 1.85  | 0.98 |
| 3/7/2019 | 11:57:20 | 20.587 | 0.002  | 0.81  | 1.01 |
| 3/7/2019 | 11:58:20 | 20.592 | -0.003 | 8.07  | 0.97 |
| 3/7/2019 | 11:59:19 | 20.586 | -0.002 | 2.88  | 0.94 |
| 3/7/2019 | 12:00:20 | 20.591 | 0.001  | 2.1   | 0.97 |
| 3/7/2019 | 12:01:19 | 20.597 | 0.002  | 9.5   | 0.97 |
| 3/7/2019 | 12:02:20 | 20.601 | 0.004  | 3.93  | 0.97 |
| 3/7/2019 | 12:03:20 | 20.594 | -0.001 | 2.17  | 0.97 |
| 3/7/2019 | 12:04:20 | 20.6   | -0.001 | 9.21  | 0.97 |
| 3/7/2019 | 12:05:20 | 20.578 | -0.001 | 2.24  | 0.98 |
| 3/7/2019 | 12:06:20 | 20.585 | -0.002 | 0.66  | 1.03 |
| 3/7/2019 | 12:07:20 | 20.583 | -0.003 | 8.04  | 1    |
| 3/7/2019 | 12:08:20 | 20.584 | -0.001 | 2.22  | 0.97 |
| 3/7/2019 | 12:09:20 | 20.595 | 0.002  | 1.83  | 1.01 |
| 3/7/2019 | 12:10:19 | 20.616 | -0.002 | 10.02 | 0.96 |
| 3/7/2019 | 12:11:20 | 20.604 | -0.002 | 4.65  | 0.94 |
| 3/7/2019 | 12:12:20 | 20.59  | -0.002 | 2.14  | 1.01 |
| 3/7/2019 | 12:13:20 | 20.583 | -0.001 | 8.02  | 1.03 |
| 3/7/2019 | 12:14:19 | 20.577 | -0.001 | 1.65  | 1.03 |
| 3/7/2019 | 12:15:20 | 20.576 | -0.002 | 0.24  | 1.03 |
| 3/7/2019 | 12:16:20 | 20.578 | -0.003 | 7.39  | 1.03 |



**Test Run 3 Begin. STRATA Version 3.2.112**

**Operator: ACTPC**

**Plant Nam Enviva Greenwood**

**Location: RCO 1 - Exhaust**

| Start Averaging |          | O2<br>% dry | CO2<br>% dry | THC<br>ppm | NOx<br>ppm | CO<br>ppm |
|-----------------|----------|-------------|--------------|------------|------------|-----------|
| 3/7/2019        | 13:05:07 | 20.563      | -0.001       | 8.85       | 1.09       | 16.51     |
| 3/7/2019        | 13:06:07 | 20.565      | 0.005        | 7.52       | 1.09       | 16.35     |
| 3/7/2019        | 13:07:06 | 20.563      | 0.003        | 13.73      | 1.09       | 16        |
| 3/7/2019        | 13:08:07 | 20.548      | 0.004        | 8.34       | 1.09       | 16.75     |
| 3/7/2019        | 13:09:07 | 20.546      | 0.002        | 5.81       | 1.11       | 16.9      |
| 3/7/2019        | 13:10:07 | 20.548      | 0.003        | 10.96      | 1.14       | 16.75     |
| 3/7/2019        | 13:11:06 | 20.542      | 0.001        | 7.38       | 1.09       | 17.68     |
| 3/7/2019        | 13:12:07 | 20.536      | 0.005        | 5.52       | 1.13       | 17.33     |
| 3/7/2019        | 13:13:07 | 20.541      | 0.003        | 11.84      | 1.14       | 16.89     |
| 3/7/2019        | 13:14:07 | 20.538      | 0.014        | 7.68       | 1.09       | 17.69     |
| 3/7/2019        | 13:15:07 | 20.543      | 0.006        | 6.34       | 1.14       | 17.66     |
| 3/7/2019        | 13:16:07 | 20.553      | 0.004        | 12.59      | 1.12       | 17.25     |
| 3/7/2019        | 13:17:07 | 20.548      | 0.003        | 9.02       | 1.09       | 17.9      |
| 3/7/2019        | 13:18:07 | 20.543      | 0.003        | 6.58       | 1.17       | 17.48     |
| 3/7/2019        | 13:19:06 | 20.531      | 0.004        | 11.99      | 1.22       | 17.07     |
| 3/7/2019        | 13:20:07 | 20.533      | 0.002        | 7.56       | 1.19       | 17.73     |
| 3/7/2019        | 13:21:07 | 20.527      | 0.006        | 5.62       | 1.16       | 17.55     |
| 3/7/2019        | 13:22:07 | 20.543      | 0.004        | 11.29      | 1.17       | 17        |
| 3/7/2019        | 13:23:07 | 20.538      | 0.003        | 8.31       | 1.11       | 17.44     |
| 3/7/2019        | 13:24:06 | 20.542      | 0.003        | 6.65       | 1.15       | 16.9      |
| 3/7/2019        | 13:25:07 | 20.546      | -0.001       | 12.76      | 1.1        | 16.25     |
| 3/7/2019        | 13:26:07 | 20.549      | 0.004        | 9.03       | 1.09       | 16.68     |
| 3/7/2019        | 13:27:07 | 20.548      | 0.002        | 7.3        | 1.09       | 16.44     |
| 3/7/2019        | 13:28:07 | 20.547      | 0.003        | 12.35      | 1.09       | 16.1      |
| 3/7/2019        | 13:29:07 | 20.542      | 0.001        | 8.34       | 1.09       | 16.78     |
| 3/7/2019        | 13:30:07 | 20.537      | 0.001        | 6.13       | 1.09       | 16.56     |
| 3/7/2019        | 13:31:06 | 20.535      | 0            | 12.03      | 1.14       | 16.18     |
| 3/7/2019        | 13:32:07 | 20.537      | 0.004        | 8.01       | 1.07       | 16.81     |
| 3/7/2019        | 13:33:07 | 20.539      | 0.001        | 6.36       | 1.03       | 16.79     |
| 3/7/2019        | 13:34:07 | 20.537      | 0.003        | 12.28      | 1.03       | 16.74     |
| 3/7/2019        | 13:35:06 | 20.54       | 0.001        | 9          | 1.03       | 17.74     |
| 3/7/2019        | 13:36:07 | 20.54       | 0.004        | 7.42       | 1.03       | 17.54     |
| 3/7/2019        | 13:37:07 | 20.534      | 0.002        | 13.95      | 1.03       | 17.31     |
| 3/7/2019        | 13:38:07 | 20.53       | 0.009        | 9.17       | 1.03       | 18.15     |
| 3/7/2019        | 13:39:07 | 20.518      | 0.007        | 6.28       | 1.06       | 18.47     |
| 3/7/2019        | 13:40:06 | 20.515      | 0.008        | 12.16      | 1.09       | 18.5      |
| 3/7/2019        | 13:41:07 | 20.514      | 0.006        | 8.08       | 1.05       | 19.22     |
| 3/7/2019        | 13:42:07 | 20.517      | 0.008        | 6.1        | 1.09       | 18.71     |
| 3/7/2019        | 13:43:07 | 20.515      | 0.002        | 12.9       | 1.09       | 18.19     |
| 3/7/2019        | 13:44:07 | 20.516      | 0.007        | 8.74       | 1.08       | 18.87     |
| 3/7/2019        | 13:45:06 | 20.52       | 0.01         | 6.62       | 1.08       | 18.79     |
| 3/7/2019        | 13:46:07 | 20.526      | 0.009        | 12.98      | 1.09       | 18.47     |
| 3/7/2019        | 13:47:07 | 20.527      | 0.008        | 9.87       | 1.04       | 19.04     |

**Test Run 3 Begin. STRATA Version 3.2.112**

**Operator: ACTPC**

**Plant Nam Enviva Greenwood**

**Location: RCO 1 - Exhaust**

|          |          | <b>O2</b> | <b>CO2</b> | <b>THC</b> | <b>NOx</b> | <b>CO</b> |
|----------|----------|-----------|------------|------------|------------|-----------|
| 3/7/2019 | 13:48:06 | 20.53     | 0.006      | 7.82       | 1.09       | 18.46     |
| 3/7/2019 | 13:49:07 | 20.524    | 0.004      | 13.48      | 1.09       | 17.82     |
| 3/7/2019 | 13:50:07 | 20.513    | 0.009      | 8.24       | 1.09       | 18.39     |
| 3/7/2019 | 13:51:06 | 20.514    | 0.004      | 6.06       | 1.14       | 18.2      |
| 3/7/2019 | 13:52:07 | 20.523    | 0.006      | 11.68      | 1.14       | 17.76     |
| 3/7/2019 | 13:53:07 | 20.514    | 0.003      | 7.96       | 1.09       | 18.25     |
| 3/7/2019 | 13:54:06 | 20.523    | 0.008      | 6.22       | 1.1        | 17.58     |
| 3/7/2019 | 13:55:07 | 20.527    | 0.005      | 12.71      | 1.1        | 16.86     |
| 3/7/2019 | 13:56:06 | 20.526    | 0.002      | 8.53       | 1.06       | 17.31     |
| 3/7/2019 | 13:57:07 | 20.534    | 0.006      | 6.97       | 1.09       | 17.2      |
| 3/7/2019 | 13:58:07 | 20.531    | 0.007      | 12.59      | 1.11       | 16.85     |
| 3/7/2019 | 13:59:06 | 20.523    | 0.003      | 8.58       | 1.09       | 17.42     |
| 3/7/2019 | 14:00:07 | 20.509    | 0.005      | 5.42       | 1.13       | 17.12     |
| 3/7/2019 | 14:01:07 | 20.507    | 0.005      | 11.53      | 1.15       | 16.84     |
| 3/7/2019 | 14:02:07 | 20.506    | 0.009      | 7.27       | 1.15       | 17.6      |
| 3/7/2019 | 14:03:07 | 20.508    | 0.009      | 5.01       | 1.15       | 17.68     |
| 3/7/2019 | 14:04:07 | 20.508    | 0.004      | 10.92      | 1.15       | 17.49     |

| Date          | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCl<br>(ppm) | SEC<br>(ppm) | Methanol<br>(ppm) | SEC<br>(ppm) | acet-<br>aldehyde<br>(ppm) | SEC<br>(ppm) |
|---------------|----------------------------|--------------|--------------|--------------|-------------------|--------------|----------------------------|--------------|
| 3/7/2019 8:57 | 0.061                      | 0.041        | 0.000        | 0.051        | 0.024             | 0.092        | 0.000                      | 0.163        |
| 3/7/2019 8:58 | 0.056                      | 0.040        | 0.000        | 0.052        | 0.095             | 0.090        | 0.000                      | 0.159        |
| 3/7/2019 8:59 | 0.114                      | 0.040        | 0.000        | 0.050        | 0.065             | 0.088        | 0.000                      | 0.158        |
| 3/7/2019 9:00 | 0.198                      | 0.041        | 0.000        | 0.053        | 0.042             | 0.089        | 0.000                      | 0.165        |
| 3/7/2019 9:01 | 0.234                      | 0.040        | 0.000        | 0.050        | 0.061             | 0.088        | 0.000                      | 0.164        |
| 3/7/2019 9:02 | 0.193                      | 0.039        | 0.000        | 0.050        | 0.099             | 0.089        | 0.000                      | 0.157        |
| 3/7/2019 9:03 | 0.079                      | 0.041        | 0.000        | 0.051        | 0.058             | 0.091        | 0.000                      | 0.164        |
| 3/7/2019 9:04 | 0.104                      | 0.040        | 0.000        | 0.053        | 0.048             | 0.087        | 0.000                      | 0.159        |
| 3/7/2019 9:05 | 0.089                      | 0.041        | 0.000        | 0.052        | 0.056             | 0.091        | 0.000                      | 0.164        |
| 3/7/2019 9:06 | 0.049                      | 0.042        | 0.000        | 0.052        | 0.002             | 0.092        | 0.000                      | 0.163        |
| 3/7/2019 9:07 | 0.063                      | 0.040        | 0.000        | 0.053        | 0.051             | 0.088        | 0.000                      | 0.160        |
| 3/7/2019 9:08 | 0.070                      | 0.040        | 0.000        | 0.052        | 0.035             | 0.089        | 0.000                      | 0.161        |
| 3/7/2019 9:09 | 0.035                      | 0.041        | 0.000        | 0.051        | 0.037             | 0.089        | 0.000                      | 0.157        |
| 3/7/2019 9:10 | 0.045                      | 0.041        | 0.000        | 0.054        | 0.098             | 0.085        | 0.000                      | 0.164        |
| 3/7/2019 9:11 | 0.094                      | 0.040        | 0.000        | 0.052        | 0.070             | 0.087        | 0.000                      | 0.165        |
| 3/7/2019 9:14 | 0.046                      | 0.044        | 0.000        | 0.055        | 0.070             | 0.084        | 0.000                      | 0.173        |
| 3/7/2019 9:16 | 0.072                      | 0.038        | 0.000        | 0.050        | 0.065             | 0.086        | 0.000                      | 0.157        |
| 3/7/2019 9:17 | 0.056                      | 0.041        | 0.000        | 0.050        | 0.063             | 0.081        | 0.000                      | 0.158        |
| 3/7/2019 9:18 | 0.072                      | 0.042        | 0.000        | 0.049        | 0.095             | 0.080        | 0.000                      | 0.165        |
| 3/7/2019 9:19 | 0.070                      | 0.038        | 0.000        | 0.046        | 0.113             | 0.077        | 0.000                      | 0.158        |
| 3/7/2019 9:20 | 0.068                      | 0.038        | 0.000        | 0.047        | 0.068             | 0.077        | 0.000                      | 0.154        |
| 3/7/2019 9:21 | 0.104                      | 0.040        | 0.000        | 0.051        | 0.101             | 0.077        | 0.000                      | 0.161        |
| 3/7/2019 9:22 | 0.147                      | 0.038        | 0.000        | 0.046        | 0.152             | 0.079        | 0.000                      | 0.153        |
| 3/7/2019 9:23 | 0.148                      | 0.037        | 0.000        | 0.045        | 0.086             | 0.078        | 0.000                      | 0.149        |
| 3/7/2019 9:24 | 0.047                      | 0.040        | 0.000        | 0.051        | 0.078             | 0.079        | 0.000                      | 0.161        |
| 3/7/2019 9:25 | 0.103                      | 0.039        | 0.000        | 0.049        | 0.160             | 0.078        | 0.000                      | 0.157        |
| 3/7/2019 9:26 | 0.094                      | 0.040        | 0.000        | 0.048        | 0.086             | 0.079        | 0.000                      | 0.162        |
| 3/7/2019 9:27 | 0.032                      | 0.039        | 0.000        | 0.049        | 0.069             | 0.079        | 0.000                      | 0.161        |
| 3/7/2019 9:28 | 0.133                      | 0.037        | 0.000        | 0.045        | 0.125             | 0.081        | 0.000                      | 0.155        |
| 3/7/2019 9:29 | 0.058                      | 0.039        | 0.000        | 0.050        | 0.098             | 0.080        | 0.000                      | 0.161        |
| 3/7/2019 9:30 | 0.073                      | 0.039        | 0.000        | 0.047        | 0.062             | 0.079        | 0.000                      | 0.160        |
| 3/7/2019 9:31 | 0.084                      | 0.039        | 0.000        | 0.047        | 0.119             | 0.079        | 0.000                      | 0.159        |
| 3/7/2019 9:32 | 0.058                      | 0.039        | 0.000        | 0.049        | 0.094             | 0.080        | 0.000                      | 0.158        |
| 3/7/2019 9:33 | 0.127                      | 0.038        | 0.000        | 0.049        | 0.111             | 0.079        | 0.000                      | 0.159        |
| 3/7/2019 9:34 | 0.142                      | 0.038        | 0.000        | 0.047        | 0.176             | 0.078        | 0.000                      | 0.158        |
| 3/7/2019 9:35 | 0.047                      | 0.040        | 0.000        | 0.047        | 0.093             | 0.078        | 0.000                      | 0.162        |
| 3/7/2019 9:36 | 0.095                      | 0.039        | 0.000        | 0.050        | 0.092             | 0.077        | 0.000                      | 0.161        |
| 3/7/2019 9:37 | 0.039                      | 0.040        | 0.000        | 0.048        | 0.124             | 0.078        | 0.000                      | 0.162        |
| 3/7/2019 9:38 | 0.021                      | 0.039        | 0.000        | 0.045        | 0.081             | 0.075        | 0.000                      | 0.159        |
| 3/7/2019 9:39 | 0.090                      | 0.040        | 0.000        | 0.051        | 0.113             | 0.077        | 0.000                      | 0.161        |
| 3/7/2019 9:40 | 0.047                      | 0.037        | 0.000        | 0.044        | 0.109             | 0.076        | 0.000                      | 0.151        |
| 3/7/2019 9:41 | 0.012                      | 0.038        | 0.000        | 0.048        | 0.061             | 0.076        | 0.000                      | 0.155        |
| 3/7/2019 9:42 | 0.084                      | 0.040        | 0.000        | 0.052        | 0.127             | 0.074        | 0.000                      | 0.159        |
| 3/7/2019 9:43 | 0.130                      | 0.037        | 0.000        | 0.046        | 0.154             | 0.075        | 0.000                      | 0.151        |
| 3/7/2019 9:44 | 0.040                      | 0.040        | 0.000        | 0.049        | 0.051             | 0.077        | 0.000                      | 0.151        |
| 3/7/2019 9:45 | 0.022                      | 0.039        | 0.000        | 0.049        | 0.109             | 0.075        | 0.000                      | 0.155        |
| 3/7/2019 9:46 | 0.064                      | 0.037        | 0.000        | 0.047        | 0.136             | 0.074        | 0.000                      | 0.149        |
| 3/7/2019 9:47 | 0.000                      | 0.038        | 0.000        | 0.047        | 0.121             | 0.074        | 0.000                      | 0.155        |
| 3/7/2019 9:48 | 0.021                      | 0.040        | 0.000        | 0.049        | 0.131             | 0.071        | 0.000                      | 0.151        |
| 3/7/2019 9:49 | 0.084                      | 0.037        | 0.000        | 0.049        | 0.170             | 0.074        | 0.000                      | 0.150        |

| Date           | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCl<br>(ppm) | SEC<br>(ppm) | Methanol<br>(ppm) | SEC<br>(ppm) | acet-<br>aldehyde<br>(ppm) | SEC<br>(ppm) |
|----------------|----------------------------|--------------|--------------|--------------|-------------------|--------------|----------------------------|--------------|
| 3/7/2019 9:50  | 0.002                      | 0.038        | 0.000        | 0.049        | 0.096             | 0.074        | 0.000                      | 0.156        |
| 3/7/2019 9:51  | 0.017                      | 0.039        | 0.000        | 0.051        | 0.116             | 0.073        | 0.000                      | 0.159        |
| 3/7/2019 9:52  | 0.079                      | 0.037        | 0.000        | 0.048        | 0.172             | 0.073        | 0.000                      | 0.150        |
| 3/7/2019 9:53  | 0.056                      | 0.039        | 0.000        | 0.047        | 0.087             | 0.072        | 0.000                      | 0.154        |
| 3/7/2019 9:54  | 0.083                      | 0.039        | 0.000        | 0.048        | 0.095             | 0.072        | 0.000                      | 0.158        |
| 3/7/2019 9:55  | 0.078                      | 0.038        | 0.000        | 0.047        | 0.132             | 0.072        | 0.000                      | 0.155        |
| 3/7/2019 9:56  | 0.060                      | 0.040        | 0.000        | 0.049        | 0.135             | 0.074        | 0.000                      | 0.158        |
| 3/7/2019 9:57  | 0.064                      | 0.040        | 0.000        | 0.049        | 0.092             | 0.073        | 0.000                      | 0.159        |
| 3/7/2019 9:58  | 0.109                      | 0.038        | 0.000        | 0.046        | 0.164             | 0.071        | 0.000                      | 0.158        |
| 3/7/2019 9:59  | 0.048                      | 0.037        | 0.000        | 0.045        | 0.079             | 0.071        | 0.000                      | 0.154        |
| 3/7/2019 10:00 | 0.016                      | 0.038        | 0.000        | 0.046        | 0.110             | 0.070        | 0.000                      | 0.154        |
| 3/7/2019 10:01 | 0.043                      | 0.039        | 0.000        | 0.048        | 0.151             | 0.071        | 0.000                      | 0.155        |
| 3/7/2019 10:02 | 0.000                      | 0.037        | 0.000        | 0.044        | 0.109             | 0.071        | 0.000                      | 0.150        |
| 3/7/2019 10:03 | 0.094                      | 0.038        | 0.000        | 0.046        | 0.124             | 0.071        | 0.000                      | 0.155        |
| 3/7/2019 10:04 | 0.100                      | 0.038        | 0.000        | 0.050        | 0.163             | 0.073        | 0.000                      | 0.157        |
| 3/7/2019 10:05 | 0.016                      | 0.040        | 0.000        | 0.049        | 0.110             | 0.073        | 0.000                      | 0.163        |
| 3/7/2019 10:06 | 0.040                      | 0.040        | 0.000        | 0.050        | 0.124             | 0.073        | 0.000                      | 0.159        |
| 3/7/2019 10:07 | 0.084                      | 0.038        | 0.000        | 0.049        | 0.174             | 0.073        | 0.000                      | 0.155        |
| 3/7/2019 10:08 | 0.002                      | 0.040        | 0.000        | 0.049        | 0.100             | 0.074        | 0.000                      | 0.158        |
| 3/7/2019 10:09 | 0.000                      | 0.039        | 0.000        | 0.048        | 0.144             | 0.076        | 0.000                      | 0.157        |
| 3/7/2019 10:10 | 0.057                      | 0.038        | 0.000        | 0.045        | 0.178             | 0.073        | 0.000                      | 0.155        |
| 3/7/2019 10:11 | 0.032                      | 0.040        | 0.000        | 0.047        | 0.144             | 0.072        | 0.000                      | 0.159        |
| 3/7/2019 10:12 | 0.043                      | 0.038        | 0.000        | 0.046        | 0.124             | 0.070        | 0.000                      | 0.161        |
| 3/7/2019 10:13 | 0.000                      | 0.038        | 0.000        | 0.047        | 0.237             | 0.057        | 0.000                      | 0.148        |
| 3/7/2019 10:14 | 0.000                      | 0.052        | 0.099        | 0.058        | 0.096             | 0.042        | 0.000                      | 0.189        |
| 3/7/2019 10:15 | 0.000                      | 0.049        | 0.057        | 0.053        | 0.092             | 0.039        | 0.000                      | 0.183        |
| 3/7/2019 10:16 | 0.000                      | 0.039        | 0.024        | 0.044        | 0.060             | 0.035        | 0.000                      | 0.146        |
| 3/7/2019 10:17 | 0.000                      | 0.027        | 0.000        | 0.036        | 0.058             | 0.027        | 0.000                      | 0.109        |
| 3/7/2019 10:18 | 0.000                      | 0.028        | 0.067        | 0.035        | 0.030             | 0.027        | 0.000                      | 0.106        |
| 3/7/2019 10:19 | 0.000                      | 0.028        | 0.053        | 0.035        | 0.007             | 0.028        | 0.000                      | 0.104        |
| 3/7/2019 10:20 | 0.000                      | 0.029        | 0.053        | 0.038        | 0.020             | 0.026        | 0.000                      | 0.111        |
| 3/7/2019 10:21 | 0.000                      | 0.026        | 0.056        | 0.032        | 0.042             | 0.028        | 0.000                      | 0.102        |
| 3/7/2019 10:22 | 0.000                      | 0.028        | 0.003        | 0.035        | 0.059             | 0.092        | 0.000                      | 0.105        |
| 3/7/2019 10:23 | 0.000                      | 0.031        | 0.017        | 0.037        | -0.238            | 2.515        | 0.000                      | 0.130        |
| 3/7/2019 10:24 | 0.000                      | 0.030        | 0.015        | 0.035        | -0.324            | 3.047        | 0.000                      | 0.133        |
| 3/7/2019 10:25 | 0.000                      | 0.031        | 0.036        | 0.034        | -0.359            | 3.071        | 0.000                      | 0.136        |
| 3/7/2019 10:26 | 0.116                      | 0.035        | 0.080        | 0.044        | 0.121             | 1.301        | 0.000                      | 0.160        |
| 3/7/2019 10:27 | 0.087                      | 0.038        | 0.000        | 0.045        | 0.135             | 0.156        | 0.000                      | 0.155        |
| 3/7/2019 10:28 | 0.098                      | 0.040        | 0.000        | 0.051        | 0.166             | 0.077        | 0.000                      | 0.160        |
| 3/7/2019 10:29 | 0.000                      | 0.040        | 0.000        | 0.047        | 0.109             | 0.072        | 0.000                      | 0.159        |
| 3/7/2019 10:30 | 0.000                      | 0.039        | 0.000        | 0.048        | 0.107             | 0.073        | 0.000                      | 0.157        |
| 3/7/2019 10:31 | 0.016                      | 0.039        | 0.000        | 0.050        | 0.192             | 0.074        | 0.000                      | 0.160        |
| 3/7/2019 10:32 | 0.023                      | 0.040        | 0.000        | 0.046        | 0.138             | 0.073        | 0.000                      | 0.160        |
| 3/7/2019 10:33 | 0.074                      | 0.040        | 0.000        | 0.049        | 0.127             | 0.073        | 0.000                      | 0.157        |
| 3/7/2019 10:34 | 0.185                      | 0.040        | 0.000        | 0.050        | 0.178             | 0.075        | 0.000                      | 0.158        |
| 3/7/2019 10:35 | 0.131                      | 0.040        | 0.000        | 0.049        | 0.094             | 0.073        | 0.000                      | 0.161        |
| 3/7/2019 10:36 | 0.056                      | 0.038        | 0.000        | 0.048        | 0.138             | 0.071        | 0.000                      | 0.157        |
| 3/7/2019 10:37 | 0.054                      | 0.038        | 0.000        | 0.047        | 0.181             | 0.071        | 0.000                      | 0.155        |
| 3/7/2019 10:38 | 0.031                      | 0.038        | 0.000        | 0.048        | 0.119             | 0.074        | 0.000                      | 0.158        |
| 3/7/2019 10:39 | 0.051                      | 0.039        | 0.000        | 0.047        | 0.107             | 0.071        | 0.000                      | 0.157        |
| 3/7/2019 10:40 | 0.092                      | 0.039        | 0.000        | 0.048        | 0.212             | 0.072        | 0.000                      | 0.154        |
| 3/7/2019 10:41 | 0.002                      | 0.039        | 0.000        | 0.052        | 0.137             | 0.072        | 0.000                      | 0.163        |

| Date           | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCl<br>(ppm) | SEC<br>(ppm) | Methanol<br>(ppm) | SEC<br>(ppm) | acet-<br>aldehyde<br>(ppm) | SEC<br>(ppm) |
|----------------|----------------------------|--------------|--------------|--------------|-------------------|--------------|----------------------------|--------------|
| 3/7/2019 10:42 | 0.013                      | 0.040        | 0.000        | 0.049        | 0.114             | 0.070        | 0.000                      | 0.158        |
| 3/7/2019 10:43 | 0.077                      | 0.037        | 0.000        | 0.048        | 0.161             | 0.074        | 0.000                      | 0.151        |
| 3/7/2019 10:44 | 0.045                      | 0.040        | 0.000        | 0.050        | 0.143             | 0.074        | 0.000                      | 0.156        |
| 3/7/2019 10:45 | 0.044                      | 0.038        | 0.000        | 0.048        | 0.095             | 0.075        | 0.000                      | 0.151        |
| 3/7/2019 10:46 | 0.144                      | 0.038        | 0.000        | 0.049        | 0.177             | 0.075        | 0.000                      | 0.152        |
| 3/7/2019 10:47 | 0.011                      | 0.040        | 0.000        | 0.049        | 0.115             | 0.073        | 0.000                      | 0.156        |
| 3/7/2019 10:48 | 0.000                      | 0.037        | 0.000        | 0.045        | 0.130             | 0.073        | 0.000                      | 0.147        |
| 3/7/2019 10:49 | 0.103                      | 0.038        | 0.000        | 0.048        | 0.195             | 0.072        | 0.000                      | 0.147        |
| 3/7/2019 10:50 | 0.011                      | 0.038        | 0.000        | 0.045        | 0.099             | 0.073        | 0.000                      | 0.151        |
| 3/7/2019 10:51 | 0.032                      | 0.040        | 0.000        | 0.049        | 0.126             | 0.073        | 0.000                      | 0.158        |
| 3/7/2019 10:52 | 0.101                      | 0.037        | 0.000        | 0.046        | 0.159             | 0.075        | 0.000                      | 0.147        |
| 3/7/2019 10:53 | 0.042                      | 0.039        | 0.000        | 0.049        | 0.100             | 0.075        | 0.000                      | 0.147        |
| 3/7/2019 10:54 | 0.065                      | 0.038        | 0.000        | 0.048        | 0.122             | 0.072        | 0.000                      | 0.157        |
| 3/7/2019 10:55 | 0.035                      | 0.037        | 0.000        | 0.046        | 0.158             | 0.072        | 0.000                      | 0.145        |
| 3/7/2019 10:56 | 0.053                      | 0.040        | 0.000        | 0.050        | 0.138             | 0.074        | 0.000                      | 0.153        |
| 3/7/2019 10:57 | 0.059                      | 0.038        | 0.000        | 0.046        | 0.119             | 0.073        | 0.000                      | 0.151        |
| 3/7/2019 10:58 | 0.089                      | 0.037        | 0.000        | 0.046        | 0.194             | 0.074        | 0.000                      | 0.149        |
| 3/7/2019 10:59 | 0.098                      | 0.039        | 0.000        | 0.049        | 0.100             | 0.072        | 0.000                      | 0.152        |
| 3/7/2019 11:00 | 0.020                      | 0.038        | 0.000        | 0.046        | 0.160             | 0.071        | 0.000                      | 0.147        |
| 3/7/2019 11:01 | 0.071                      | 0.037        | 0.000        | 0.044        | 0.173             | 0.071        | 0.000                      | 0.144        |
| 3/7/2019 11:02 | 0.037                      | 0.038        | 0.000        | 0.046        | 0.162             | 0.069        | 0.000                      | 0.150        |
| 3/7/2019 11:03 | 0.033                      | 0.038        | 0.000        | 0.046        | 0.152             | 0.068        | 0.000                      | 0.151        |
| 3/7/2019 11:04 | 0.078                      | 0.037        | 0.000        | 0.045        | 0.154             | 0.069        | 0.000                      | 0.142        |
| 3/7/2019 11:05 | 0.041                      | 0.039        | 0.000        | 0.048        | 0.112             | 0.069        | 0.000                      | 0.150        |
| 3/7/2019 11:06 | 0.006                      | 0.039        | 0.000        | 0.046        | 0.144             | 0.071        | 0.000                      | 0.148        |
| 3/7/2019 11:07 | 0.051                      | 0.038        | 0.000        | 0.050        | 0.204             | 0.069        | 0.000                      | 0.146        |
| 3/7/2019 11:08 | 0.057                      | 0.039        | 0.000        | 0.047        | 0.135             | 0.070        | 0.000                      | 0.145        |
| 3/7/2019 11:09 | 0.040                      | 0.039        | 0.000        | 0.050        | 0.115             | 0.072        | 0.000                      | 0.153        |
| 3/7/2019 11:10 | 0.057                      | 0.039        | 0.000        | 0.053        | 0.166             | 0.069        | 0.000                      | 0.150        |
| 3/7/2019 11:11 | 0.000                      | 0.038        | 0.000        | 0.047        | 0.106             | 0.073        | 0.000                      | 0.144        |
| 3/7/2019 11:12 | 0.077                      | 0.037        | 0.000        | 0.046        | 0.103             | 0.072        | 0.000                      | 0.144        |
| 3/7/2019 11:13 | 0.040                      | 0.037        | 0.000        | 0.046        | 0.159             | 0.071        | 0.000                      | 0.144        |
| 3/7/2019 11:14 | 0.030                      | 0.039        | 0.000        | 0.049        | 0.155             | 0.073        | 0.000                      | 0.142        |
| 3/7/2019 11:15 | 0.000                      | 0.039        | 0.000        | 0.048        | 0.148             | 0.073        | 0.000                      | 0.148        |
| 3/7/2019 11:16 | 0.086                      | 0.036        | 0.000        | 0.046        | 0.159             | 0.074        | 0.000                      | 0.142        |
| 3/7/2019 11:17 | 0.056                      | 0.040        | 0.000        | 0.047        | 0.133             | 0.074        | 0.000                      | 0.149        |
| 3/7/2019 11:18 | 0.044                      | 0.040        | 0.000        | 0.047        | 0.154             | 0.073        | 0.000                      | 0.150        |
| 3/7/2019 11:19 | 0.026                      | 0.037        | 0.000        | 0.046        | 0.155             | 0.076        | 0.000                      | 0.144        |
| 3/7/2019 11:20 | 0.026                      | 0.039        | 0.000        | 0.047        | 0.116             | 0.076        | 0.000                      | 0.144        |
| 3/7/2019 11:21 | 0.000                      | 0.037        | 0.000        | 0.046        | 0.105             | 0.073        | 0.000                      | 0.142        |
| 3/7/2019 11:22 | 0.052                      | 0.037        | 0.000        | 0.046        | 0.189             | 0.070        | 0.000                      | 0.142        |
| 3/7/2019 11:23 | 0.002                      | 0.040        | 0.000        | 0.047        | 0.120             | 0.071        | 0.000                      | 0.149        |
| 3/7/2019 11:24 | 0.000                      | 0.040        | 0.000        | 0.047        | 0.145             | 0.068        | 0.000                      | 0.149        |
| 3/7/2019 11:25 | 0.036                      | 0.039        | 0.000        | 0.051        | 0.157             | 0.069        | 0.000                      | 0.146        |
| 3/7/2019 11:26 | 0.010                      | 0.039        | 0.000        | 0.046        | 0.129             | 0.071        | 0.000                      | 0.144        |
| 3/7/2019 11:27 | 0.037                      | 0.039        | 0.000        | 0.047        | 0.107             | 0.070        | 0.000                      | 0.143        |
| 3/7/2019 11:28 | 0.112                      | 0.038        | 0.000        | 0.045        | 0.186             | 0.071        | 0.000                      | 0.149        |
| 3/7/2019 11:29 | 0.056                      | 0.039        | 0.000        | 0.045        | 0.127             | 0.072        | 0.000                      | 0.146        |
| 3/7/2019 11:30 | 0.004                      | 0.040        | 0.000        | 0.047        | 0.153             | 0.069        | 0.000                      | 0.148        |
| 3/7/2019 11:31 | 0.000                      | 0.036        | 0.000        | 0.043        | 0.140             | 0.072        | 0.000                      | 0.145        |
| 3/7/2019 11:32 | 0.000                      | 0.040        | 0.000        | 0.047        | 0.108             | 0.072        | 0.000                      | 0.150        |
| 3/7/2019 11:33 | 0.000                      | 0.040        | 0.000        | 0.048        | 0.124             | 0.071        | 0.000                      | 0.149        |

| Date           | Form-<br>aldehyde<br>(ppm) | SEC<br>(ppm) | HCl<br>(ppm) | SEC<br>(ppm) | Methanol<br>(ppm) | SEC<br>(ppm) | acet-<br>aldehyde<br>(ppm) | SEC<br>(ppm) |
|----------------|----------------------------|--------------|--------------|--------------|-------------------|--------------|----------------------------|--------------|
| 3/7/2019 11:34 | 0.029                      | 0.039        | 0.000        | 0.049        | 0.197             | 0.071        | 0.000                      | 0.149        |
| 3/7/2019 11:35 | 0.040                      | 0.041        | 0.000        | 0.047        | 0.098             | 0.070        | 0.000                      | 0.153        |
| 3/7/2019 11:36 | 0.000                      | 0.041        | 0.000        | 0.051        | 0.119             | 0.068        | 0.000                      | 0.153        |
| 3/7/2019 11:37 | 0.000                      | 0.039        | 0.000        | 0.047        | 0.159             | 0.071        | 0.000                      | 0.149        |
| 3/7/2019 11:38 | 0.018                      | 0.040        | 0.000        | 0.049        | 0.125             | 0.069        | 0.000                      | 0.150        |
| 3/7/2019 11:39 | 0.049                      | 0.039        | 0.000        | 0.048        | 0.147             | 0.070        | 0.000                      | 0.147        |
| 3/7/2019 11:40 | 0.096                      | 0.039        | 0.000        | 0.048        | 0.205             | 0.071        | 0.000                      | 0.150        |
| 3/7/2019 11:41 | 0.005                      | 0.042        | 0.000        | 0.048        | 0.121             | 0.071        | 0.000                      | 0.151        |
| 3/7/2019 11:42 | 0.007                      | 0.041        | 0.000        | 0.044        | 0.149             | 0.069        | 0.000                      | 0.149        |
| 3/7/2019 11:43 | 0.000                      | 0.040        | 0.000        | 0.049        | 0.165             | 0.069        | 0.000                      | 0.152        |
| 3/7/2019 11:44 | 0.001                      | 0.040        | 0.000        | 0.046        | 0.079             | 0.071        | 0.000                      | 0.149        |
| 3/7/2019 11:45 | 0.000                      | 0.041        | 0.000        | 0.046        | 0.098             | 0.071        | 0.000                      | 0.150        |
| 3/7/2019 11:46 | 0.032                      | 0.040        | 0.000        | 0.045        | 0.172             | 0.072        | 0.000                      | 0.149        |
| 3/7/2019 11:47 | 0.010                      | 0.043        | 0.000        | 0.051        | 0.098             | 0.074        | 0.000                      | 0.160        |
| 3/7/2019 11:48 | 0.000                      | 0.041        | 0.000        | 0.048        | 0.156             | 0.071        | 0.000                      | 0.154        |
| 3/7/2019 11:49 | 0.058                      | 0.039        | 0.000        | 0.045        | 0.184             | 0.072        | 0.000                      | 0.151        |
| 3/7/2019 11:50 | 0.023                      | 0.039        | 0.000        | 0.046        | 0.093             | 0.073        | 0.000                      | 0.147        |
| 3/7/2019 11:51 | 0.000                      | 0.041        | 0.000        | 0.050        | 0.124             | 0.069        | 0.000                      | 0.156        |
| 3/7/2019 11:52 | 0.029                      | 0.039        | 0.000        | 0.047        | 0.204             | 0.072        | 0.000                      | 0.147        |
| 3/7/2019 11:53 | 0.001                      | 0.040        | 0.000        | 0.047        | 0.111             | 0.072        | 0.000                      | 0.148        |
| 3/7/2019 11:54 | 0.000                      | 0.042        | 0.000        | 0.050        | 0.140             | 0.070        | 0.000                      | 0.156        |
| 3/7/2019 11:55 | 0.035                      | 0.041        | 0.000        | 0.051        | 0.154             | 0.070        | 0.000                      | 0.154        |
| 3/7/2019 11:56 | 0.000                      | 0.039        | 0.000        | 0.046        | 0.122             | 0.073        | 0.000                      | 0.148        |
| 3/7/2019 11:57 | 0.011                      | 0.039        | 0.000        | 0.047        | 0.112             | 0.071        | 0.000                      | 0.147        |
| 3/7/2019 11:58 | 0.030                      | 0.039        | 0.000        | 0.049        | 0.118             | 0.072        | 0.000                      | 0.148        |
| 3/7/2019 11:59 | 0.026                      | 0.040        | 0.000        | 0.046        | 0.096             | 0.071        | 0.000                      | 0.147        |
| 3/7/2019 12:00 | 0.017                      | 0.040        | 0.000        | 0.050        | 0.146             | 0.069        | 0.000                      | 0.151        |
| 3/7/2019 12:01 | 0.073                      | 0.039        | 0.000        | 0.048        | 0.168             | 0.071        | 0.000                      | 0.157        |
| 3/7/2019 12:02 | 0.040                      | 0.041        | 0.000        | 0.050        | 0.102             | 0.072        | 0.000                      | 0.153        |
| 3/7/2019 12:03 | 0.000                      | 0.041        | 0.000        | 0.047        | 0.122             | 0.069        | 0.000                      | 0.149        |
| 3/7/2019 12:04 | 0.055                      | 0.041        | 0.000        | 0.049        | 0.152             | 0.068        | 0.000                      | 0.157        |
| 3/7/2019 12:05 | 0.000                      | 0.044        | 0.000        | 0.048        | 0.084             | 0.070        | 0.000                      | 0.157        |
| 3/7/2019 12:06 | 0.013                      | 0.041        | 0.000        | 0.048        | 0.118             | 0.068        | 0.000                      | 0.154        |
| 3/7/2019 12:07 | 0.014                      | 0.040        | 0.000        | 0.049        | 0.211             | 0.069        | 0.000                      | 0.153        |
| 3/7/2019 12:08 | 0.000                      | 0.042        | 0.000        | 0.045        | 0.083             | 0.071        | 0.000                      | 0.155        |
| 3/7/2019 12:09 | 0.005                      | 0.042        | 0.000        | 0.047        | 0.122             | 0.069        | 0.000                      | 0.153        |
| 3/7/2019 12:10 | 0.039                      | 0.038        | 0.000        | 0.050        | 0.208             | 0.071        | 0.000                      | 0.147        |
| 3/7/2019 12:11 | 0.020                      | 0.040        | 0.000        | 0.047        | 0.108             | 0.069        | 0.000                      | 0.149        |
| 3/7/2019 12:12 | 0.017                      | 0.039        | 0.000        | 0.046        | 0.134             | 0.070        | 0.000                      | 0.144        |
| 3/7/2019 12:13 | 0.000                      | 0.038        | 0.000        | 0.045        | 0.196             | 0.069        | 0.000                      | 0.145        |
| 3/7/2019 12:14 | 0.000                      | 0.038        | 0.000        | 0.048        | 0.102             | 0.068        | 0.000                      | 0.147        |
| 3/7/2019 12:15 | 0.000                      | 0.039        | 0.000        | 0.045        | 0.110             | 0.070        | 0.000                      | 0.142        |
| 3/7/2019 12:16 | 0.043                      | 0.039        | 0.000        | 0.048        | 0.181             | 0.069        | 0.000                      | 0.150        |
| 3/7/2019 12:17 | 0.000                      | 0.043        | 0.000        | 0.050        | 0.103             | 0.069        | 0.000                      | 0.151        |
| 3/7/2019 12:18 | 0.000                      | 0.041        | 0.000        | 0.051        | 0.123             | 0.068        | 0.000                      | 0.151        |
| 3/7/2019 12:19 | 0.000                      | 0.039        | 0.000        | 0.048        | 0.169             | 0.070        | 0.000                      | 0.149        |
| 3/7/2019 12:20 | 0.000                      | 0.041        | 0.000        | 0.049        | 0.158             | 0.069        | 0.000                      | 0.154        |
| 3/7/2019 12:21 | 0.021                      | 0.037        | 0.000        | 0.044        | 0.194             | 0.079        | 0.000                      | 0.140        |
| 3/7/2019 12:22 | 0.026                      | 0.046        | 0.123        | 0.059        | 0.150             | 0.040        | 0.000                      | 0.171        |
| 3/7/2019 12:23 | 0.000                      | 0.041        | 0.174        | 0.053        | 0.113             | 0.034        | 0.000                      | 0.158        |
| 3/7/2019 12:24 | 0.000                      | 0.035        | 0.072        | 0.045        | -0.045            | 0.876        | 0.000                      | 0.141        |
| 3/7/2019 12:25 | 0.000                      | 0.030        | 0.009        | 0.039        | -0.276            | 2.879        | 0.000                      | 0.138        |

| Date  | Time | Direct Spike Results, Spike <sub>dir</sub> |           | System Spiked Result |           | Native Concentrations, Unspike |           | Dilution, DF | Expected Spike Conc., CS | Recovery      |
|-------|------|--------------------------------------------|-----------|----------------------|-----------|--------------------------------|-----------|--------------|--------------------------|---------------|
|       |      | (ppm HCl)                                  | (ppm SF6) | (ppm HCl)            | (ppm SF6) | (ppm HCl)                      | (ppm SF6) |              |                          |               |
| 6-Mar | 1730 | 46.82                                      | 2.15      | 5.132                | 0.213     | -0.071                         | -0.001    | 10.0%        | 4.6                      | <b>111.6%</b> |
| 6-Mar | 1730 | 46.82                                      | 2.15      | 4.288                | 0.182     | -0.071                         | -0.001    | 8.5%         | 3.9                      | <b>109.3%</b> |
| 6-Mar | 1730 | 46.82                                      | 2.15      | 3.770                | 0.182     | -0.071                         | -0.001    | 8.5%         | 3.9                      | <b>96.1%</b>  |
| 6-Mar | 1730 | 46.82                                      | 2.15      | 3.449                | 0.182     | -0.071                         | -0.001    | 8.5%         | 3.9                      | <b>87.9%</b>  |
| 6-Mar | 1730 | 46.82                                      | 2.15      | 3.143                | 0.181     | -0.071                         | -0.001    | 8.5%         | 3.9                      | <b>80.6%</b>  |

| Date    | Time | CTS Scan (pathlength) | SEC (ppm) | Cell Pressure (psi) | Cell Temp (deg C) | Deviation from Previous | Deviation from Average |
|---------|------|-----------------------|-----------|---------------------|-------------------|-------------------------|------------------------|
| 7-Mar   | 746  | 8.12                  | 0.114     | 14.86               | 181               | NA                      | 0.0%                   |
| Average |      | 8.116                 | 0.114     |                     |                   |                         |                        |

### Stratification Test

| Point                       | Average Reading |       | Variation from Mean |              |
|-----------------------------|-----------------|-------|---------------------|--------------|
|                             | NOx             | CO    | NOx                 | CO           |
| 1                           | 1.12            | 29.94 | 0.00                | 0.3          |
| 2                           | 1.09            | 29.86 | 0.03                | 0.4          |
| 3                           | 1.14            | 30.56 | 0.02                | 0.3          |
| 4                           | 1.12            | 31.65 | 0.00                | 1.4          |
| 5                           | 1.11            | 30.95 | 0.01                | 0.7          |
| 6                           | 1.14            | 30.49 | 0.02                | 0.2          |
| 7                           | 1.13            | 29.88 | 0.01                | 0.4          |
| 8                           | 1.11            | 28.90 | 0.01                | 1.4          |
| 9                           |                 |       |                     |              |
| 10                          |                 |       |                     |              |
| 11                          |                 |       |                     |              |
| 12                          |                 |       |                     |              |
| Mean                        | 1.12            | 30.28 |                     |              |
| Maximum Variation From Mean |                 |       | 0.0                 | 1.4          |
| Percent of Mean             |                 |       | 2.46                | 4.56         |
| Result                      |                 |       | Unstratified        | Unstratified |

Specifications (%)

|            |
|------------|
| ≤5         |
| >5 and ≤10 |
| >10        |



**APPENDIX III-D**  
**Methane Laboratory Report**

**Report is not due from the lab until Friday, March 22.**

# Air Control Techniques, P.C.

301 East Durham Rd.  
Cary, NC 27513

ENV – Green  
Client Project # 2333

Analytical Report  
(0319-054)

*EPA Method 18 (Bags)*  
Methane



**Enthalpy Analytical, LLC**

Phone: (919) 850 - 4392 / Fax: (919) 850 - 9012 / [www.enthalpy.com](http://www.enthalpy.com)  
800-1 Capitola Drive Durham, NC 27713-4385

I certify that to the best of my knowledge all analytical data presented in this report:

- Have been checked for completeness
- Are accurate, error-free, and legible
- Have been conducted in accordance with approved protocol, and that all deviations and analytical problems are summarized in the appropriate narrative(s)

This analytical report was prepared in Portable Document Format (.PDF) and contains 96 pages.

Report Issued: 03/21/2019



# Summary of Results

## Enthalpy Analytical

Company: Air Control Techniques PC

Job No.: 0319-054 EPA Method 18 (Bags)

Client No.: 2333

### Summary Table - Methane

---

#### Results Adjusted Using Recovery Efficiencies

| <u>Sample ID</u>                  | <i>RCO1-1</i> | <i>RCO1-2</i> | <i>RCO1-3</i> |
|-----------------------------------|---------------|---------------|---------------|
| <u>Adjusted Concentration ppm</u> | 1.65 J        | 1.68 J        | 1.58 J        |

---

# Results

Enthalpy Analytical

Company: Air Control Techniques PC  
Job No.: 0319-054 EPA Method 18 (Bags)  
Client No.: 2333

Analysis Method: EDITHP1576F\_C1-C7.M

Methane

| Sample ID | Filename #1 | Filename #2 | Filename #3 | MDL   | Curve Min | Curve Max | Ret Time (min) | Ret Time (min) | Ret Time (min) | %dif RT | Conc #1 | Conc #2 | Conc #3 | %dif conc | DF | Avg Conc (ppm) | Spike Rec % | Adj. Conc (ppm) | Flag |
|-----------|-------------|-------------|-------------|-------|-----------|-----------|----------------|----------------|----------------|---------|---------|---------|---------|-----------|----|----------------|-------------|-----------------|------|
| RCO1-1    | 003F0101.D  | 003F0102.D  | 003F0103.D  | 0.510 | 5.10      | 49,960    | 1.51           | 1.51           | 1.51           | 0.0     | 1.38    | 2.18    | 1.60    | 26.4      | 1  | 1.72           | 105%        | 1.65            | J    |
| RCO1-2    | 004F0201.D  | 004F0202.D  | 004F0203.D  | 0.510 | 5.10      | 49,960    | 1.51           | 1.51           | 1.51           | 0.0     | 1.91    | 1.68    | 1.69    | 8.7       | 1  | 1.76           | 105%        | 1.68            | J    |
| RCO1-3    | 005F0301.D  | 005F0302.D  | 005F0303.D  | 0.510 | 5.10      | 49,960    | 1.51           | 1.51           | 1.51           | 0.0     | 1.56    | 1.71    | 1.70    | 5.8       | 1  | 1.66           | 105%        | 1.58            | J    |
| RCO1-1 SP | 003F0702.D  | 003F0703.D  | 003F0704.D  | 0.510 | 5.10      | 49,960    | 1.51           | 1.51           | 1.51           | 0.0     | 20.9    | 20.3    | 20.4    | 1.9       | 1  | 20.5           | 105%        |                 |      |

## Enthalpy Analytical

Company: Air Control Techniques PC

Job No.: 0319-054 EPA Method 18 (Bags)

Client No.: 2333

## Spike Hold Times

| Spiked Bag       | Time Spiked      | Spike Analyzed   | Hold Time (Hours) | Related Bag   | Related Bag Sampled Date | Bag Analyzed     | Hold Time (Hours) |
|------------------|------------------|------------------|-------------------|---------------|--------------------------|------------------|-------------------|
| <b>RCO1-1 SP</b> | 03-08-2019 11:11 | 03-09-2019 12:35 | 25.4              | <b>RCO1-1</b> | 03-07-2019 09:30         | 03-08-2019 09:37 | 24.1              |
|                  |                  |                  |                   | <b>RCO1-2</b> | 03-07-2019 11:30         | 03-08-2019 10:19 | 22.8              |
|                  |                  |                  |                   | <b>RCO1-3</b> | 03-07-2019 13:30         | 03-08-2019 11:03 | 21.6              |



## Enthalpy Analytical

Company: Air Control Techniques PC  
 Job No.: 0319-054 EPA Method 18 (Bags)  
 Client No.: 2333

### Spiked Bag

| <i>RCO1-1 SP</i> |                          | Methane      |
|------------------|--------------------------|--------------|
| Before Spiking   | Inj1 (ppmv)              | 1.38         |
|                  | Inj2 (ppmv)              | 2.18         |
|                  | Inj3 (ppmv)              | 1.60         |
|                  | Avg ppmv                 | 1.72         |
|                  | Bag vol L NTP            | 2.67         |
| Gas Spike        | Cylinder                 | CC100532     |
|                  | Expires                  | 1/31/22      |
|                  | Press/Temp               | 762.5 / 72.0 |
|                  | Vol (mL)                 | 600          |
|                  | Cyl Dil Factor           | 1            |
|                  | Cyl Conc (ppmv)          | 100          |
|                  | Vol (mL NTP)             | 597          |
|                  |                          | 0.0597       |
| Totals           | Sp Bag Vol L NTP         | 3.27         |
|                  | Corrected Initial (ppmv) | 1.41         |
|                  | Spike Amount (mL NTP)    | 0.0597       |
|                  | Spike Amount (ppmv)      | 18.3         |
|                  | Expected (ppmv)          | 19.7         |
| Result           | Inj1 (ppmv)              | 20.9         |
|                  | Inj2 (ppmv)              | 20.3         |
|                  | Inj3 (ppmv)              | 20.4         |
|                  | Avg (ppmv)               | 20.5         |
| <b>Recovery</b>  |                          | <b>105%</b>  |

# Narrative Summary

## Enthalpy Analytical Narrative Summary

|                 |                               |
|-----------------|-------------------------------|
| <b>Company</b>  | Air Control Techniques PC     |
| <b>Job #</b>    | 0319-054 EPA Method 18 (Bags) |
| <b>Client #</b> | 2333                          |

### Custody

David Myers of Enthalpy Analytical, LLC received the samples on 3/8/2019 at ambient temperature after being relinquished by Air Control Techniques PC. The samples were received in good condition.

Prior to, during, and after analysis, the samples were kept under lock with access only to authorized personnel by Enthalpy Analytical, LLC.

### Analysis

The samples were analyzed for methane using the analytical procedures in EPA Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography (40 CFR Part 60, Appendix A).

The standards and samples were analyzed following the procedures specified in section 8.2.1, Integrated Bag Sampling and Analysis.

All samples and standards were introduced directly to the column using an automated multi-port Valco gas sampling valve equipped with a stainless steel loop. Methane was referenced to certified gas phase standards.

The analyses were performed using an Agilent Technologies Model 7890A, Gas Chromatograph ("Edith" CN10722006) equipped with a Flame Ionization Detector.

### Calibration

The calibration curves are located in the Raw Data section of this report and referenced in the Analysis Method column on the Detailed Results page.

For each calibration curve used, the first page of the curve contains all method specific parameters (i.e., curve type, origin, weight, etc.) used to quantify the samples. The calibration curve section also includes a table with the Retention Time (RetTime), Level (Lvl), Amount (corresponding units), Area, Response Factor (Amt/Area) and the analyte Name. The calibration table is used to identify (by retention time) and quantify each target compound.



## Enthalpy Analytical Narrative Summary

(continued)

|                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Chromatographic Conditions</b> | The acquisition methods <i>AQ_EDITHP503_HRVOC_LONG</i> and <i>AQ_EDITHP503_HRVOC</i> are included in the Raw Data section of this report.                                                                                                                                                                                                                                                                                                                                          |
| <b>QC Notes</b>                   | <p>As required by the method, a recovery study was performed on a bag sample. The bag sample <i>RCOI-1</i> was spiked on 3/8/2019 at 11:11 AM. The recovery efficiency value met the method-required limits of 70 to 130%. The recovery efficiency value was used to adjust the results following equation 18-7 of Method 18.</p> <p>The analysis of the laboratory method blank exhibited no methane at concentrations greater than the MDL.</p>                                  |
| <b>Reporting Notes</b>            | <p>These analytical results are reported on a wet basis. The user of this report should determine the percent moisture in the sample and correct the reported value to ppmvd as appropriate.</p> <p>These analyses met the requirements of the TNI Standard. Any deviations from the requirements of the reference method or TNI Standard have been stated above.</p> <p>The results presented in this report are representative of the samples as provided to the laboratory.</p> |

## General Reporting Notes

The following are general reporting notes that are applicable to all Enthalpy Analytical, LLC data reports, unless specifically noted otherwise.

- Any analysis which refers to the method as “**Type**” represents a planned deviation from the reference method. For instance a Hydrogen Sulfide assay from a Tedlar bag would be labeled as “EPA Method 16-Type” because Tedlar bags are not mentioned as one of the collection options in EPA Method 16.
- The acronym **MDL** represents the Minimum Detection Limit. Below this value the laboratory cannot determine the presence of the analyte of interest reliably.
- The acronym **LOQ** represents the Limit of Quantification. Below this value the laboratory cannot quantitate the analyte of interest within the criteria of the method.
- The acronym **ND** following a value indicates a non-detect or analytical result below the MDL.
- The letter **J** in the Qualifier or Flag column in the results indicates that the value is between the MDL and the LOQ. The laboratory can positively identify the analyte of interest as present, but the value should be considered an estimate.
- The letter **E** in the Qualifier or Flag column indicates an analytical result exceeding 100% of the highest calibration point. The associated value should be considered as an estimate.
- Sample results are presented ‘as measured’ for single injection methodologies, or an average value if multiple injections are made. If all injections are below the MDL, the sample is considered non-detect and the ND value is presented. If one, but not all, are below the MDL, the MDL value is used for any injections that are below the MDL. For example, if the MDL is 0.500 and LOQ is 1.00, and the instrument measures 0.355, 0.620, and 0.442 - the result reported is the average of 0.500, 0.620, and 0.500 - - - i.e. 0.540 with a J flag.
- When a spike recovery (Bag Spike, Collocated Spike Train, or liquid matrix spike) is being calculated, the native (unspiked) sample result is used in the calculations, as long as the value is above the MDL. If a sample is ND, then 0 is used as the native amount (not the MDL value).
- The acronym **DF** represents Dilution Factor. This number represents dilution of the sample during the preparation and/or analysis process. The analytical result taken from a laboratory instrument is multiplied by the DF to determine the final undiluted sample results.
- The addition of **MS** to the Sample ID represents a Matrix Spike. An aliquot of an actual sample is spiked with a known amount of analyte so that a percent recovery value can be determined. The MS analysis indicates what effect the sample matrix may have on the target analyte, i.e. whether or not anything in the sample matrix interferes with the analysis of the analyte(s).



## General Reporting Notes

(continued)

- The addition of **MSD** to the Sample ID represents a Matrix Spike Duplicate. Prepared in the same manner as a MS, the use of duplicate matrix spikes allows further confirmation of laboratory quality by showing the consistency of results gained by performing the same steps multiple times.
- The addition of **LD** to the Sample ID represents a Laboratory Duplicate. The analyst prepares an additional aliquot of sample for testing and the results of the duplicate analysis are compared to the initial result. The result should have a difference value of within 10% of the initial result (if the results of the original analysis are greater than the LOQ).
- The addition of **AD** to the Sample ID represents an Alternate Dilution. The analyst prepares an additional aliquot at a different dilution factor (usually double the initial factor). This analysis helps confirm that no additional compound is present and coeluting or sharing absorbance with the analyte of interest, as they would have a different response/absorbance than the analyte of interest.
- The Sample ID **LCS** represents a Laboratory Control Sample. Clean matrix, similar to the client sample matrix, prepared and analyzed by the laboratory using the same reagents, spiking standards and procedures used for the client samples. The LCS is used to assess the control of the laboratory's analytical system. Whenever spikes are prepared for our client projects, two spikes are retained as LCSs. The LCSs are labeled with the associated project number and kept in-house at the appropriate temperature conditions. When the project samples are received for analysis, the LCSs are analyzed to confirm that the analyte could be recovered from the media, separate from the samples which were used on the project and which may have been affected by source matrix, sample collection, and/or sample transport.
- **Significant Figures:** Where the reported value is much greater than unity (1.00) in the units expressed, the number is rounded to a whole number of units, rather than to 3 significant figures. For example, a value of 10,456.45 ug catch is rounded to 10,456 ug. There are five significant digits displayed, but no confidence should be placed on more than two significant digits. In the case of small numbers, generally 3 significant figures are presented, but still only 2 should be used with confidence. Many neat materials are only certified to 3 digits, and as the mathematically correct final result is always 1 digit less than all its pre-cursors - 2 significant figures are what are most defensible.
- **Manual Integration:** The data systems used for processing will flag manually integrated peaks with an "M". There are several reasons a peak may be manually integrated. These reasons will be identified by the following two letter designations on sample chromatograms, if provided in the report. The peak was *not integrated* by the software "**NI**", the peak was *integrated incorrectly* by the software "**II**" or the *wrong peak* was integrated by the software "**WP**". These codes will accompany the analyst's manual integration stamp placed next to the compound name on the chromatogram.



# Sample Custody







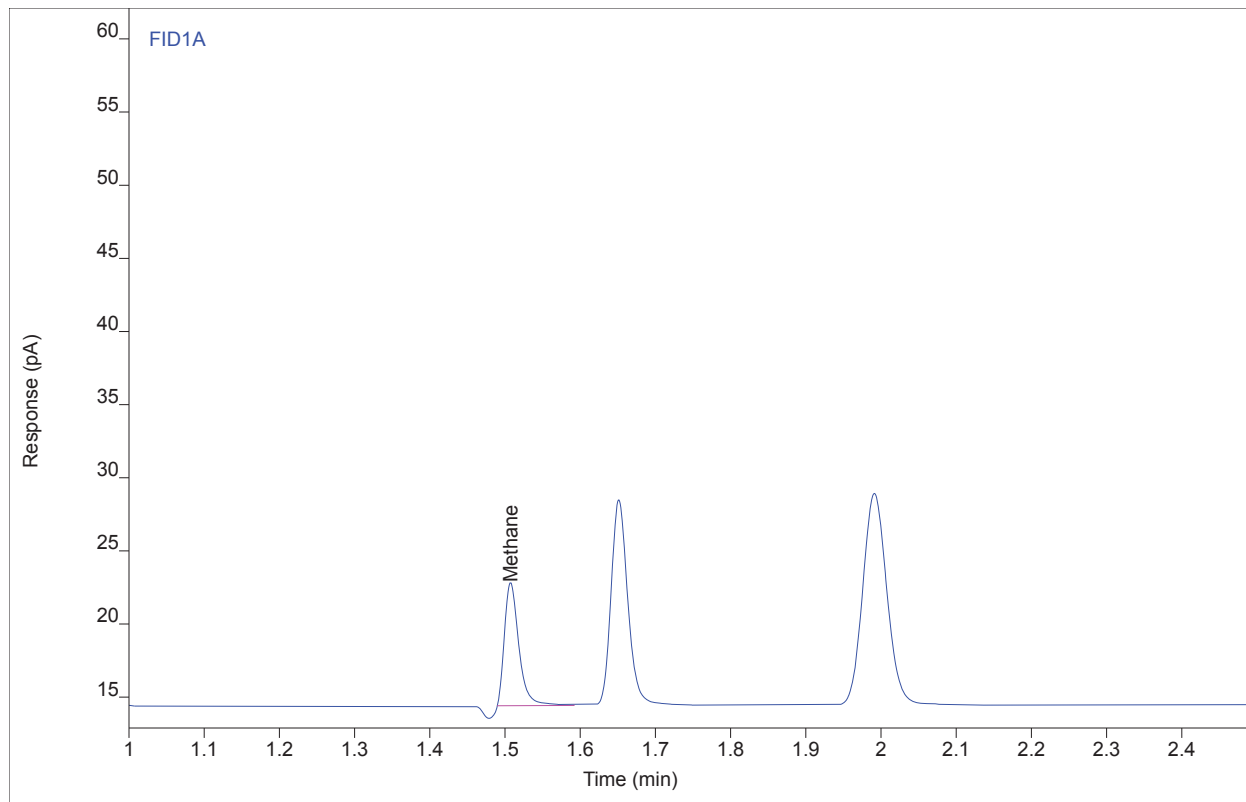
# Raw Data

# Chromatogram Report

Sample Name Edithp1686 #C4 ENV(1=600,2=400)  
Sequence Name EDITHP1711 ver.4  
Inj Data File 002F0302.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/8/2019 1:18 AM  
File Modified 3/8/2019 9:30 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 2  
Injection Volume 250  
Injection 2 of 4  
Acquisition Method AQ\_EDITHP503\_HRVOC.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 2/20/2019 3:54 PM  
Printed 3/11/2019 9:56 AM



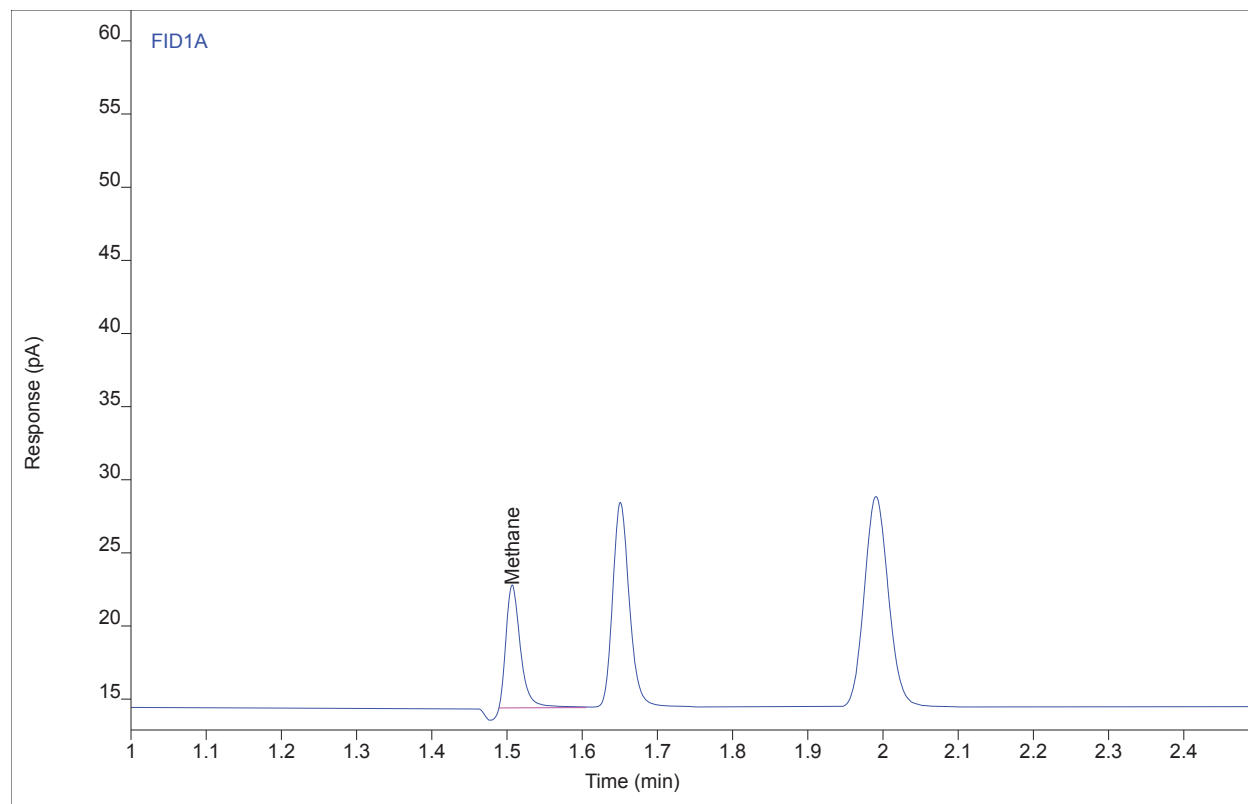
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | PB   | 1.51 | 11.2721 | 8.33229 | 41.3771 | 1  | 41.3771 | ppm  |

# Chromatogram Report

Sample Name Edithp1686 #C4 ENV(1=600,2=400)  
Sequence Name EDITHP1711 ver.4  
Inj Data File 002F0303.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/8/2019 1:34 AM  
File Modified 3/8/2019 9:30 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 2  
Injection Volume 250  
Injection 3 of 4  
Acquisition Method AQ\_EDITHP503\_HRVOC.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 2/20/2019 3:54 PM  
Printed 3/11/2019 9:56 AM



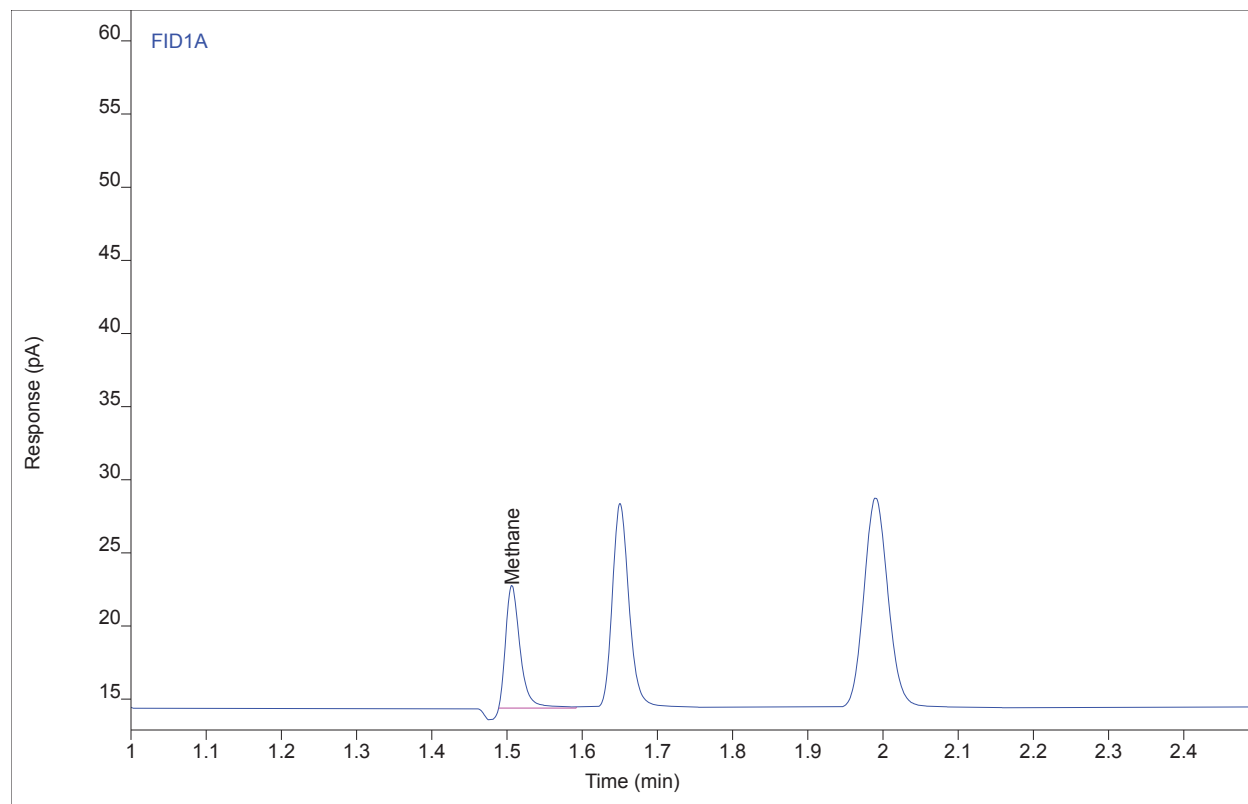
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | PB   | 1.51 | 11.3013 | 8.28440 | 41.4833 | 1  | 41.4833 | ppm  |

# Chromatogram Report

Sample Name Edithp1686 #C4 ENV(1=600,2=400)  
Sequence Name EDITHP1711 ver.4  
Inj Data File 002F0304.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/8/2019 1:49 AM  
File Modified 3/8/2019 9:30 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 2  
Injection Volume 250  
Injection 4 of 4  
Acquisition Method AQ\_EDITHP503\_HRVOC.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 2/20/2019 3:54 PM  
Printed 3/11/2019 9:56 AM



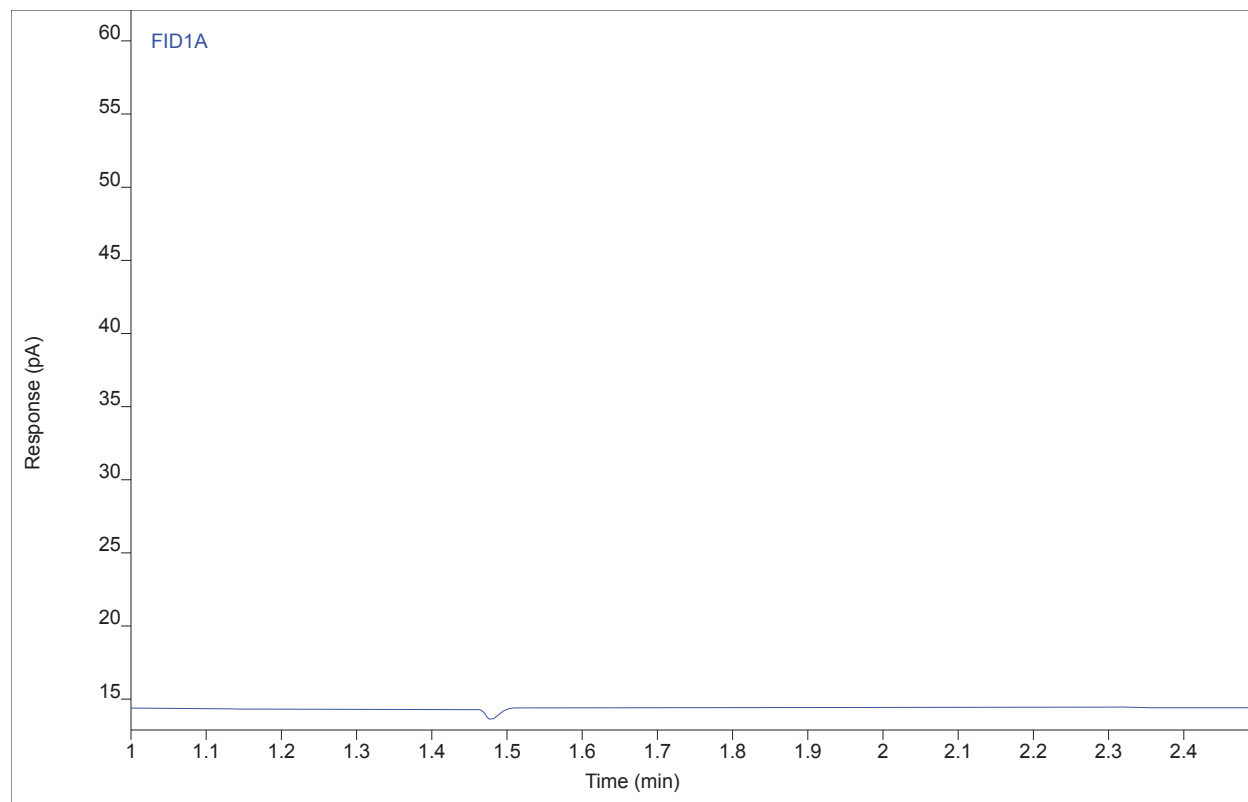
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | PB   | 1.51 | 11.2745 | 8.35602 | 41.3859 | 1  | 41.3859 | ppm  |

# Chromatogram Report

Sample Name Zero Air Blank  
Sequence Name EDITHP1711 ver.4  
Inj Data File 016F0501.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/8/2019 3:15 AM  
File Modified 3/8/2019 9:30 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 16  
Injection Volume 250  
Injection 1 of 3  
Acquisition Method AQ\_EDITHP503\_HRVOC\_LONG.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 2/20/2019 3:54 PM  
Printed 3/11/2019 9:56 AM



| Compound | Type | RT     | Area | Height | Amount | DF | SampAmt | Unit |
|----------|------|--------|------|--------|--------|----|---------|------|
| Methane  |      | (1.50) |      |        |        | 1  |         |      |

## Analyst Peak Integration Comments

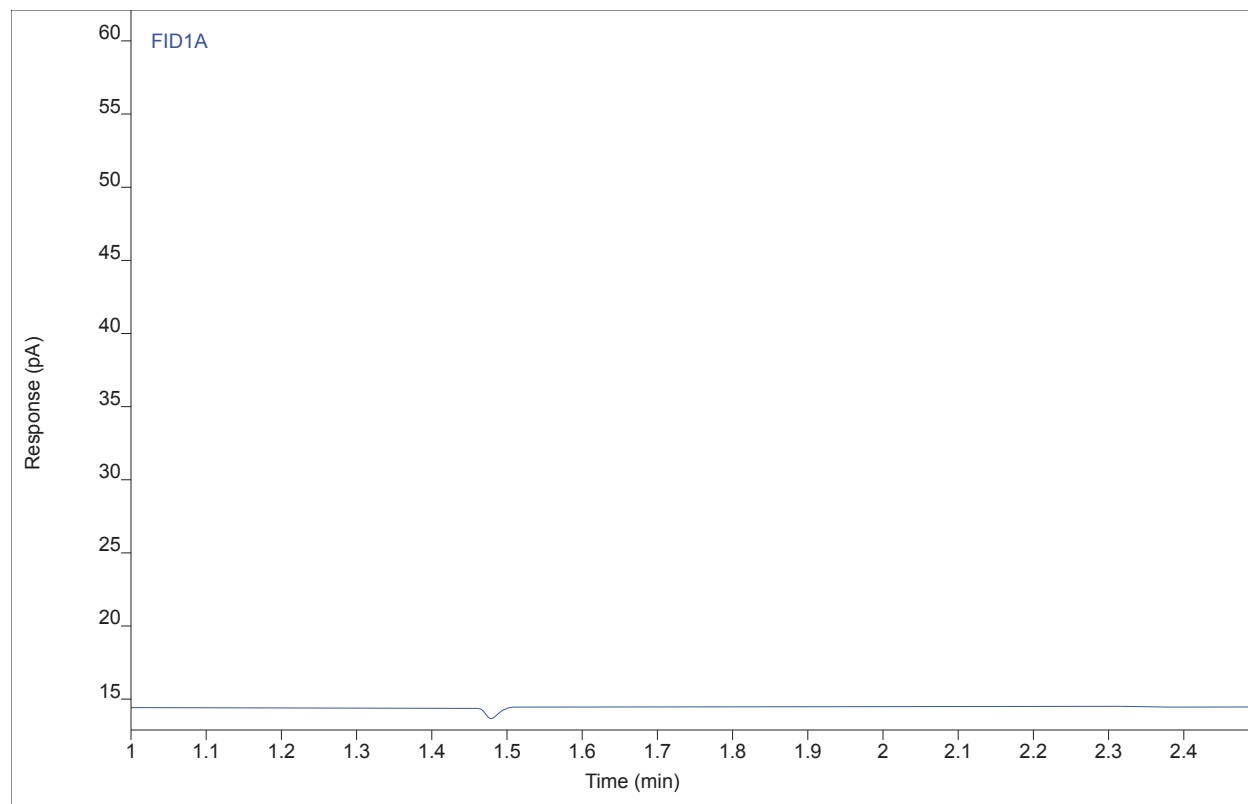
09:29:44 03/08/19 Jennie Parrish NI-Negative peak

# Chromatogram Report

Sample Name Zero Air Blank  
Sequence Name EDITHP1711 ver.4  
Inj Data File 016F0502.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/8/2019 3:39 AM  
File Modified 3/8/2019 9:30 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 16  
Injection Volume 250  
Injection 2 of 3  
Acquisition Method AQ\_EDITHP503\_HRVOC\_LONG.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 2/20/2019 3:54 PM  
Printed 3/11/2019 9:56 AM



| Compound | Type | RT     | Area | Height | Amount | DF | SampAmt | Unit |
|----------|------|--------|------|--------|--------|----|---------|------|
| Methane  |      | (1.50) |      |        |        | 1  |         |      |

## Analyst Peak Integration Comments

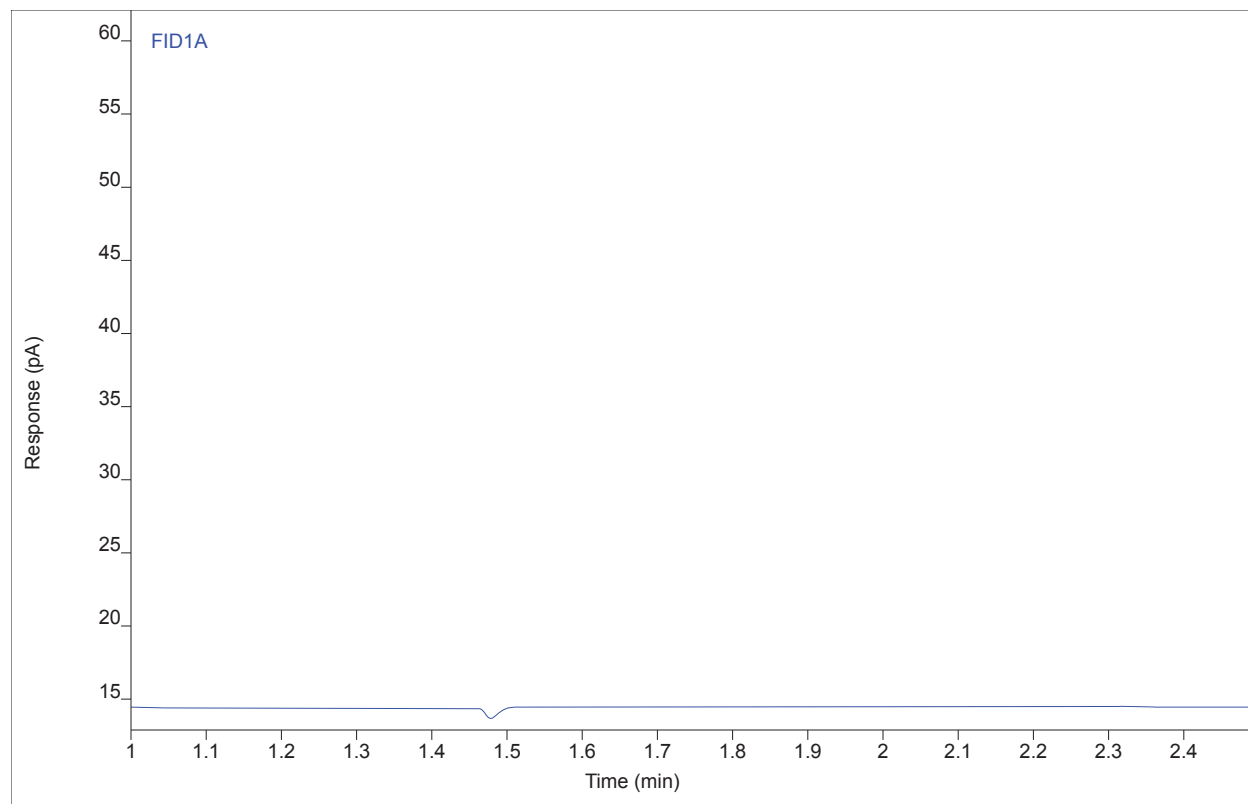
09:29:12 03/08/19 Jennie Parrish NI-Negative Peak

# Chromatogram Report

Sample Name Zero Air Blank  
Sequence Name EDITHP1711 ver.4  
Inj Data File 016F0503.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/8/2019 4:02 AM  
File Modified 3/8/2019 9:30 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 16  
Injection Volume 250  
Injection 3 of 3  
Acquisition Method AQ\_EDITHP503\_HRVOC\_LONG.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 2/20/2019 3:54 PM  
Printed 3/11/2019 9:56 AM



| Compound | Type | RT     | Area | Height | Amount | DF | SampAmt | Unit |
|----------|------|--------|------|--------|--------|----|---------|------|
| Methane  |      | (1.50) |      |        |        | 1  |         |      |

## Analyst Peak Integration Comments

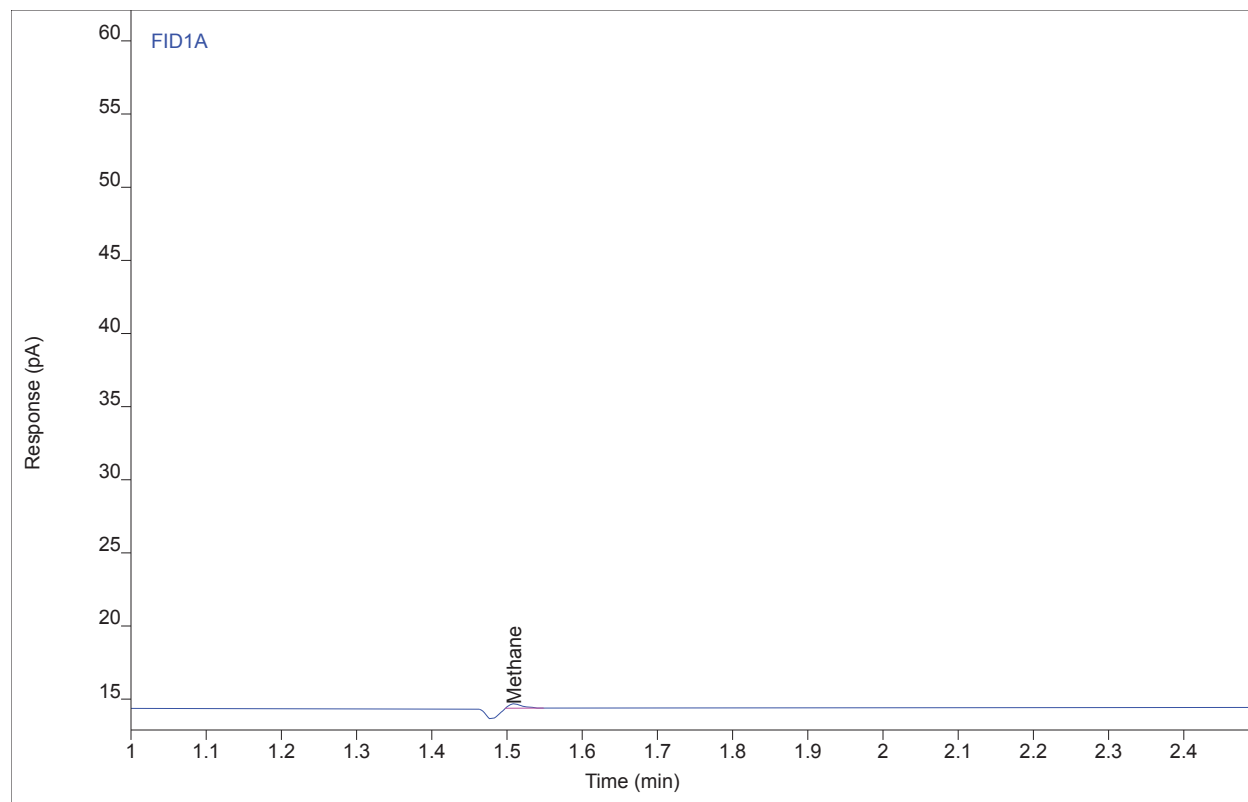
09:28:58 03/08/19 Jennie Parrish NI-Negative peak

# Chromatogram Report

Sample Name 0319-054.RCO1-1.Bag  
Sequence Name EDITHP1712 ver.2  
Inj Data File 003F0101.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/8/2019 9:37 AM  
File Modified 3/11/2019 8:05 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 3  
Injection Volume 250  
Injection 1 of 3  
Acquisition Method AQ\_EDITHP503\_HRVOC.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 3/8/2019 7:56 AM  
Printed 3/11/2019 9:56 AM



| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | PB   | 1.51 | 0.35005 | 0.29787 | 1.38264 | 1  | 1.38264 | ppm  |

## Analyst Peak Integration Comments

09:47:17 03/08/19 Jennie Parrish II-C1

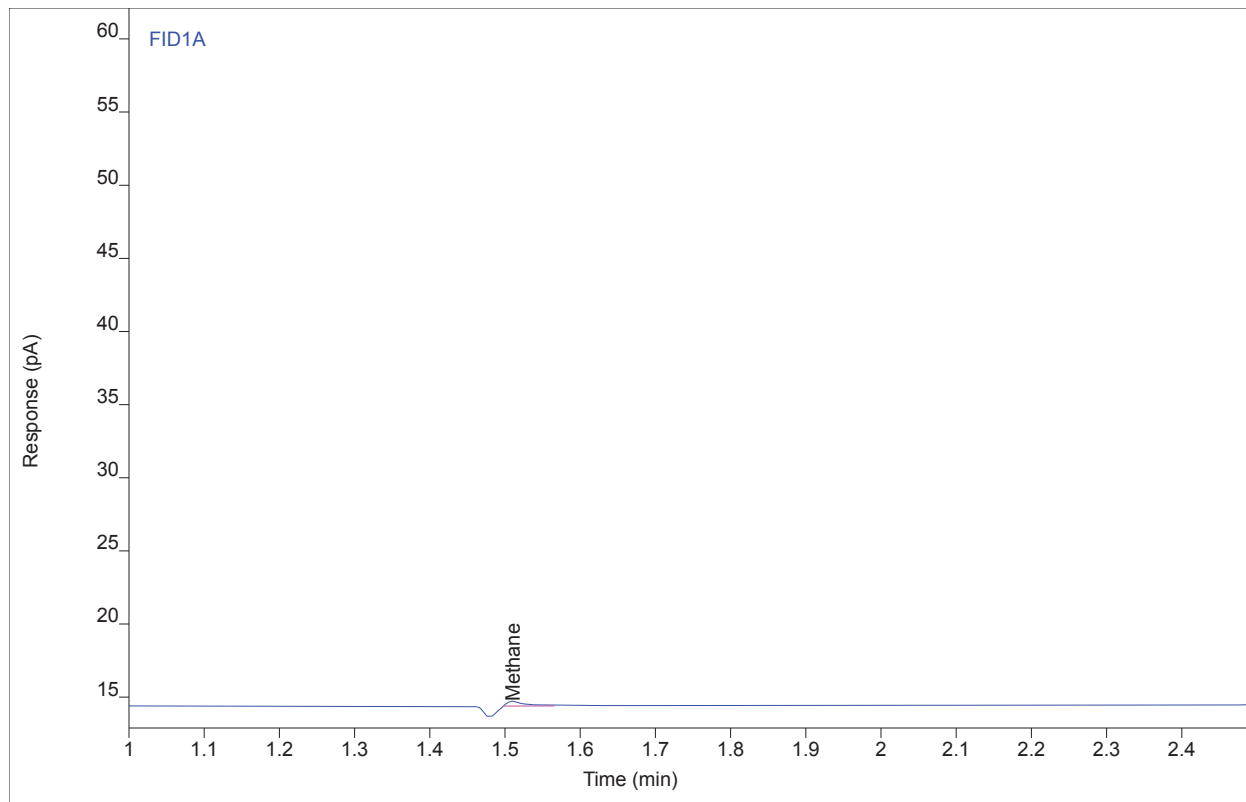


# Chromatogram Report

Sample Name 0319-054.RCO1-1.Bag  
Sequence Name EDITHP1712 ver.2  
Inj Data File 003F0102.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/8/2019 9:51 AM  
File Modified 3/11/2019 8:05 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 3  
Injection Volume 250  
Injection 2 of 3  
Acquisition Method AQ\_EDITHP503\_HRVOC.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 3/8/2019 7:56 AM  
Printed 3/11/2019 9:56 AM



| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | PB   | 1.51 | 0.55075 | 0.32622 | 2.17539 | 1  | 2.17539 | ppm  |

## Analyst Peak Integration Comments

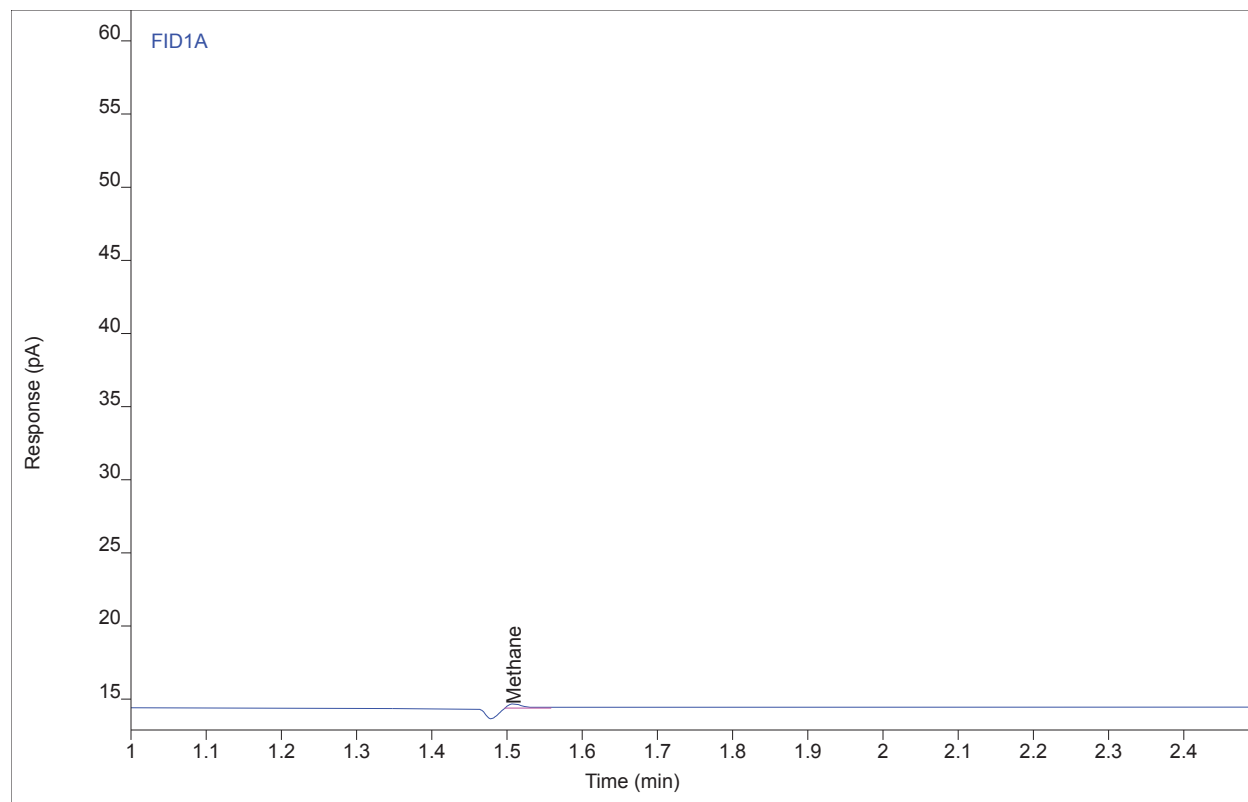
10:01:55 03/08/19 Jennie Parrish II-C1

# Chromatogram Report

Sample Name 0319-054.RCO1-1.Bag  
Sequence Name EDITHP1712 ver.2  
Inj Data File 003F0103.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/8/2019 10:05 AM  
File Modified 3/11/2019 8:05 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 3  
Injection Volume 250  
Injection 3 of 3  
Acquisition Method AQ\_EDITHP503\_HRVOC.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 3/8/2019 7:56 AM  
Printed 3/11/2019 9:56 AM



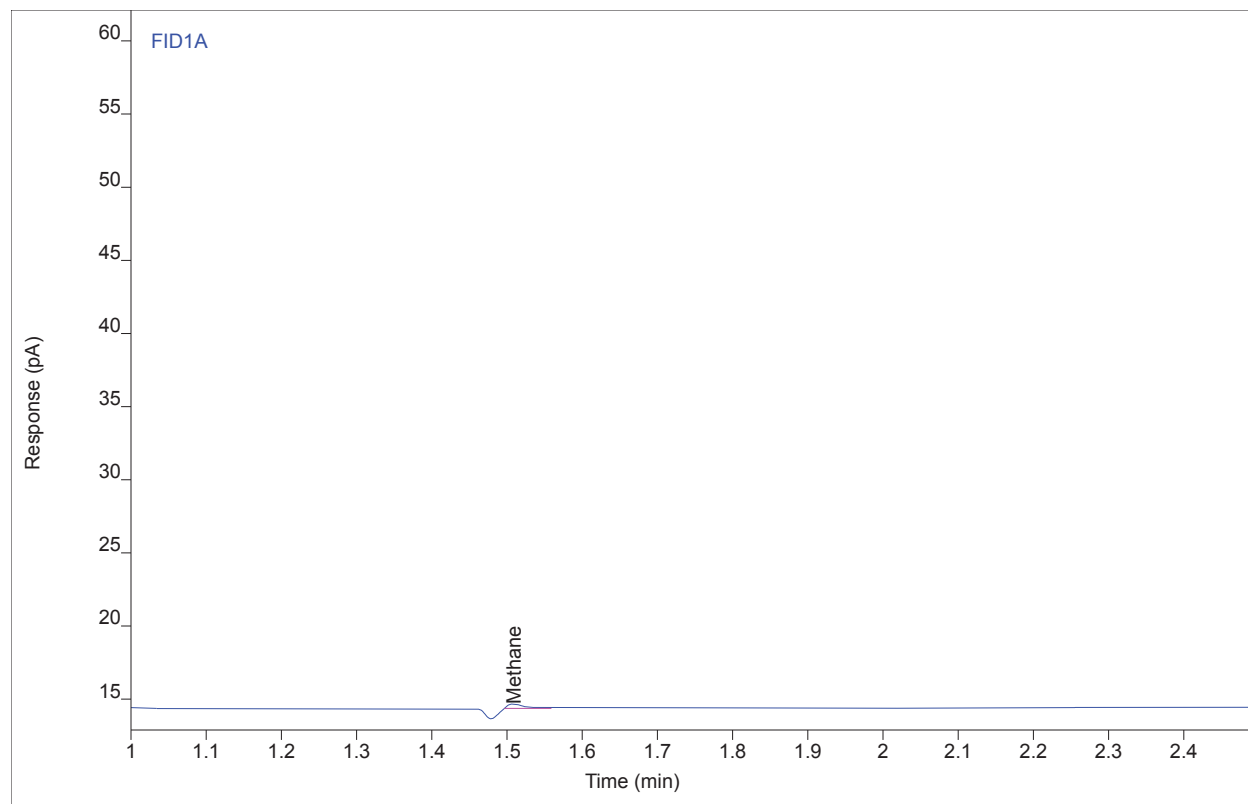
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | PB   | 1.51 | 0.40607 | 0.30269 | 1.60394 | 1  | 1.60394 | ppm  |

# Chromatogram Report

Sample Name 0319-054.RCO1-2.Bag  
Sequence Name EDITHP1712 ver.2  
Inj Data File 004F0201.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/8/2019 10:19 AM  
File Modified 3/11/2019 8:05 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 4  
Injection Volume 250  
Injection 1 of 3  
Acquisition Method AQ\_EDITHP503\_HRVOC.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 3/8/2019 7:56 AM  
Printed 3/11/2019 9:56 AM



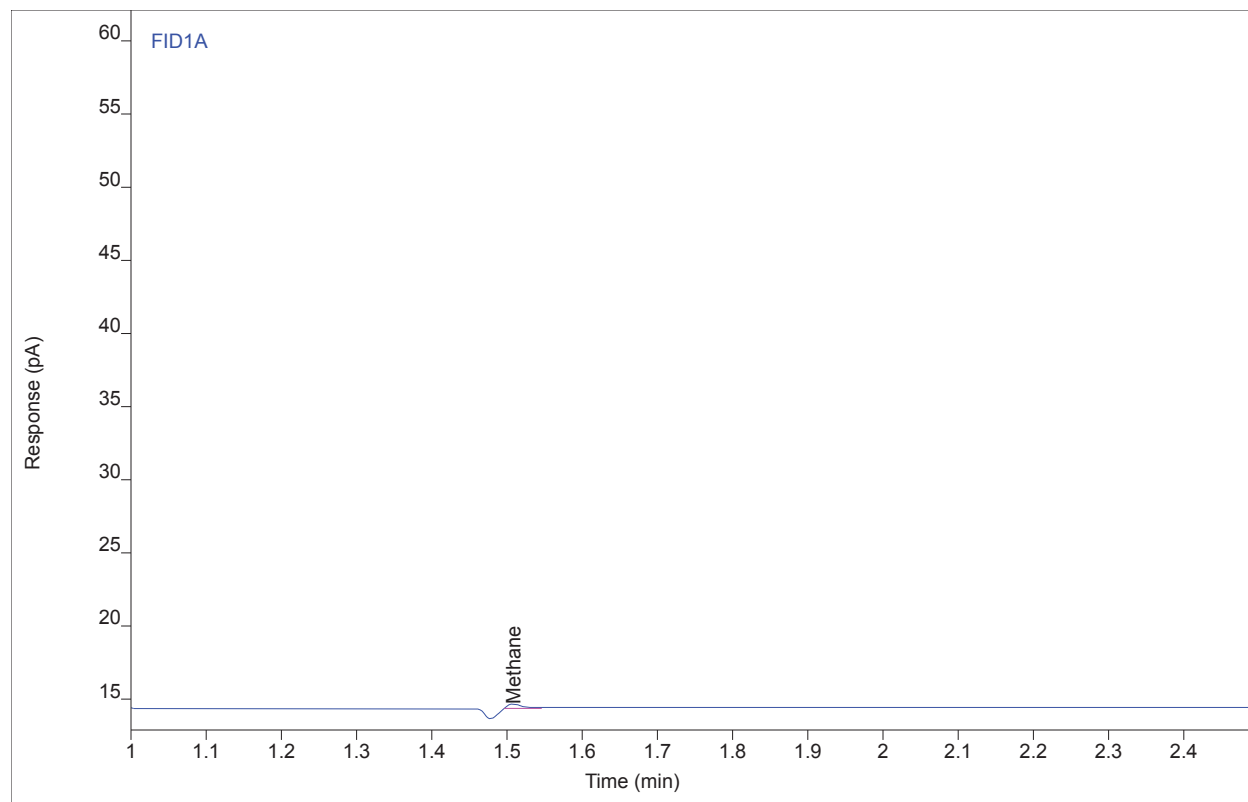
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | PB   | 1.51 | 0.48378 | 0.31472 | 1.91086 | 1  | 1.91086 | ppm  |

# Chromatogram Report

Sample Name 0319-054.RCO1-2.Bag  
Sequence Name EDITHP1712 ver.2  
Inj Data File 004F0202.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/8/2019 10:34 AM  
File Modified 3/11/2019 8:06 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 4  
Injection Volume 250  
Injection 2 of 3  
Acquisition Method AQ\_EDITHP503\_HRVOC.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 3/8/2019 7:56 AM  
Printed 3/11/2019 9:56 AM



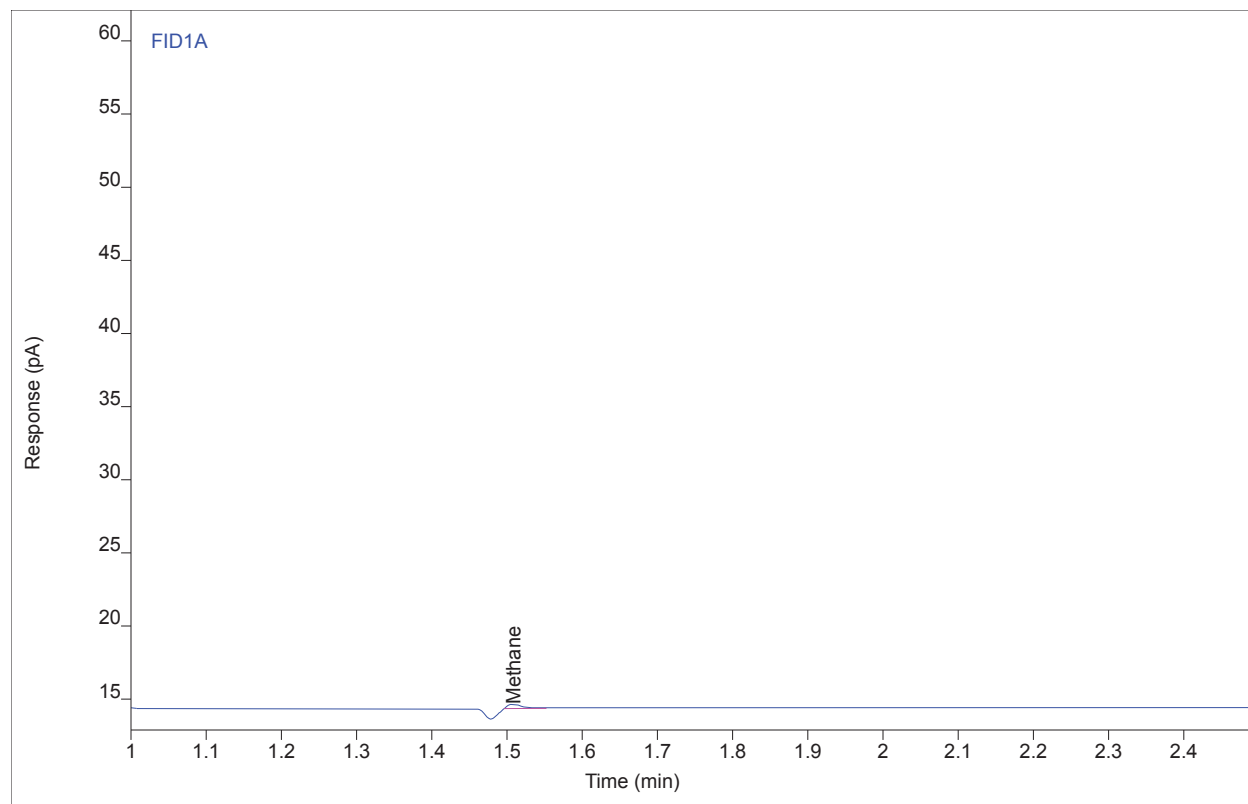
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | PV   | 1.51 | 0.42493 | 0.31375 | 1.67843 | 1  | 1.67843 | ppm  |

# Chromatogram Report

Sample Name 0319-054.RCO1-2.Bag  
Sequence Name EDITHP1712 ver.2  
Inj Data File 004F0203.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/8/2019 10:48 AM  
File Modified 3/11/2019 8:06 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 4  
Injection Volume 250  
Injection 3 of 3  
Acquisition Method AQ\_EDITHP503\_HRVOC.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 3/8/2019 7:56 AM  
Printed 3/11/2019 9:56 AM



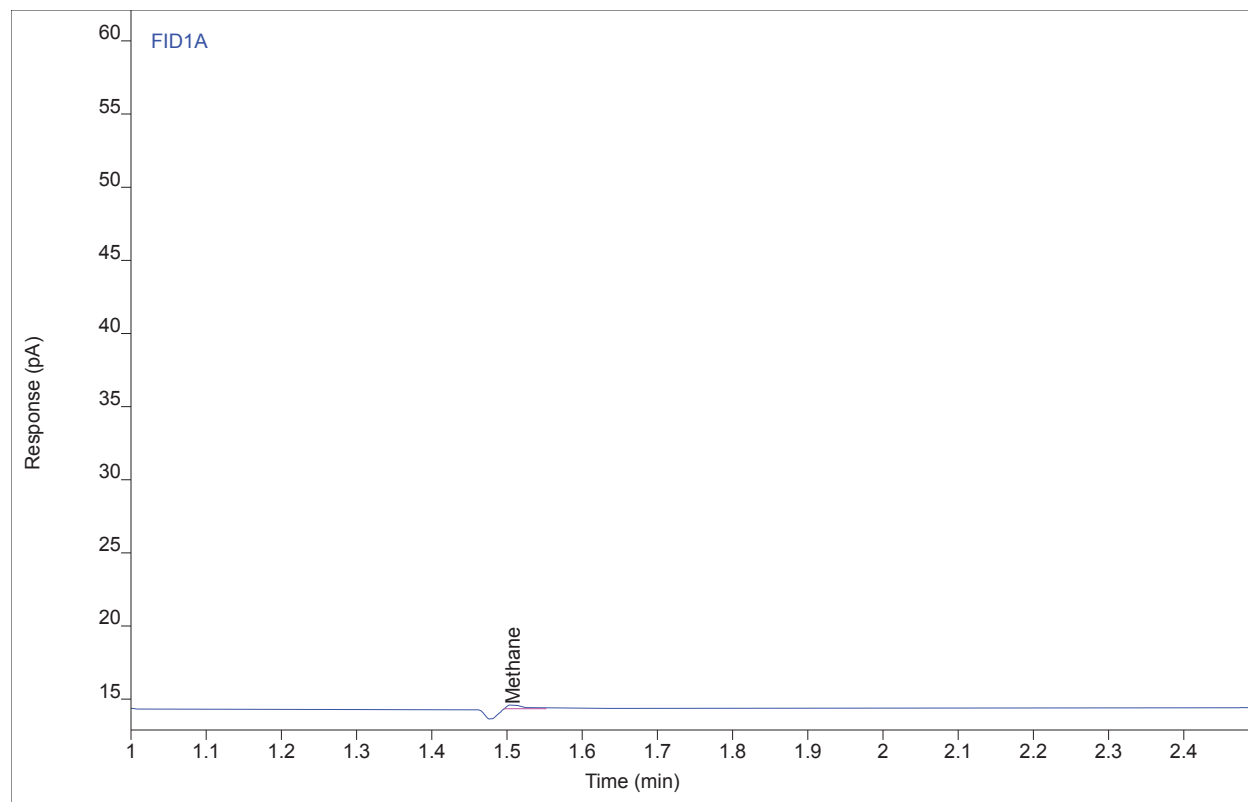
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | PB   | 1.51 | 0.42693 | 0.30645 | 1.68633 | 1  | 1.68633 | ppm  |

# Chromatogram Report

Sample Name 0319-054.RCO1-3.Bag  
Sequence Name EDITHP1712 ver.2  
Inj Data File 005F0301.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/8/2019 11:03 AM  
File Modified 3/11/2019 8:06 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 5  
Injection Volume 250  
Injection 1 of 3  
Acquisition Method AQ\_EDITHP503\_HRVOC.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 3/8/2019 7:56 AM  
Printed 3/11/2019 9:56 AM



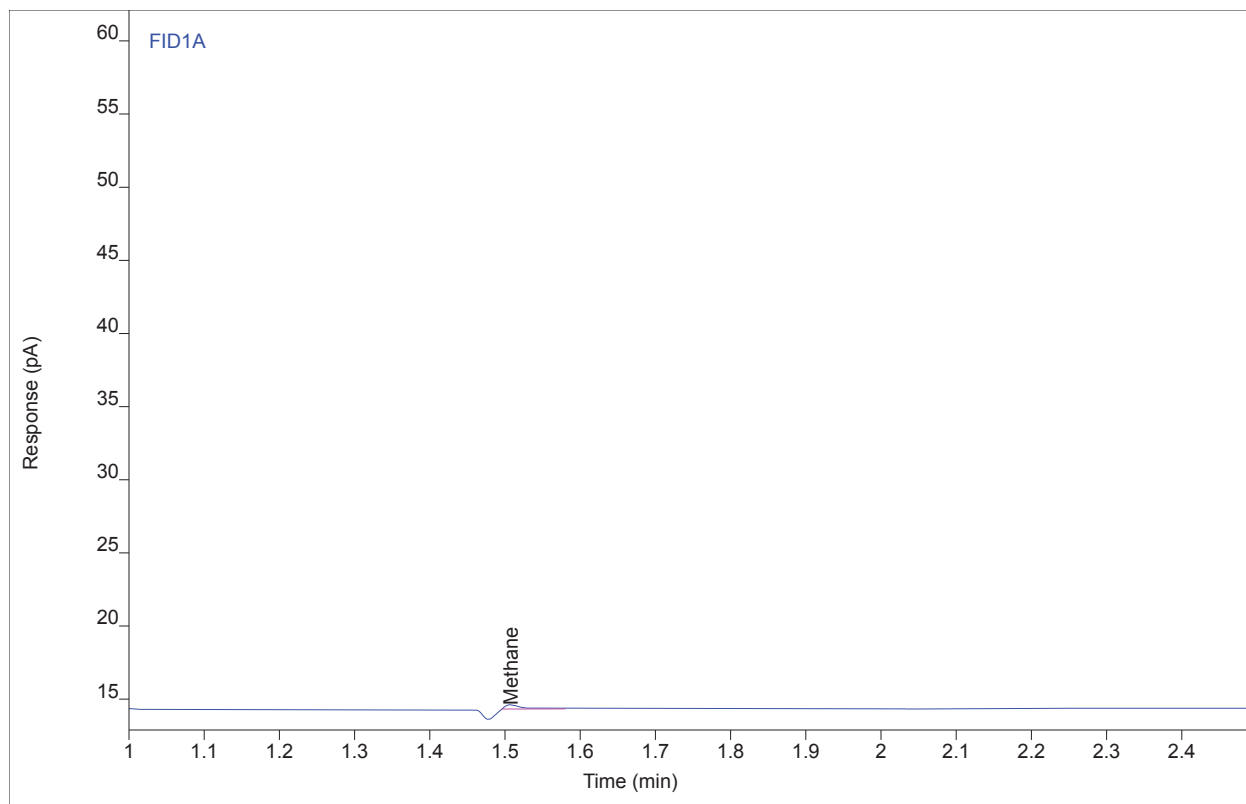
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | PB   | 1.51 | 0.39515 | 0.29787 | 1.56077 | 1  | 1.56077 | ppm  |

# Chromatogram Report

Sample Name 0319-054.RCO1-3.Bag  
Sequence Name EDITHP1712 ver.2  
Inj Data File 005F0302.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/8/2019 11:17 AM  
File Modified 3/11/2019 8:06 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 5  
Injection Volume 250  
Injection 2 of 3  
Acquisition Method AQ\_EDITHP503\_HRVOC.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 3/8/2019 7:56 AM  
Printed 3/11/2019 9:56 AM



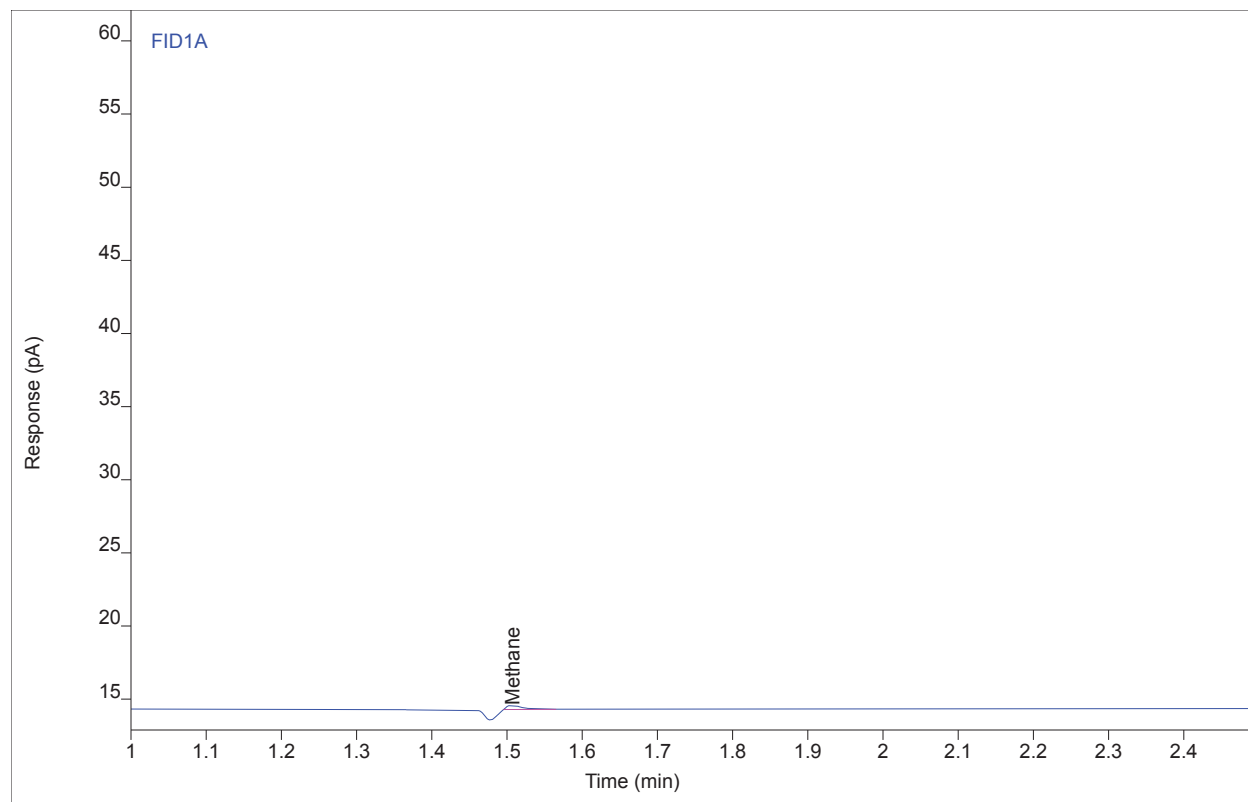
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | PV   | 1.51 | 0.43205 | 0.29912 | 1.70655 | 1  | 1.70655 | ppm  |

# Chromatogram Report

Sample Name 0319-054.RCO1-3.Bag  
Sequence Name EDITHP1712 ver.2  
Inj Data File 005F0303.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/8/2019 11:32 AM  
File Modified 3/11/2019 8:06 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 5  
Injection Volume 250  
Injection 3 of 3  
Acquisition Method AQ\_EDITHP503\_HRVOC.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 3/8/2019 7:56 AM  
Printed 3/11/2019 9:56 AM



| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | PB   | 1.51 | 0.43097 | 0.29850 | 1.70226 | 1  | 1.70226 | ppm  |

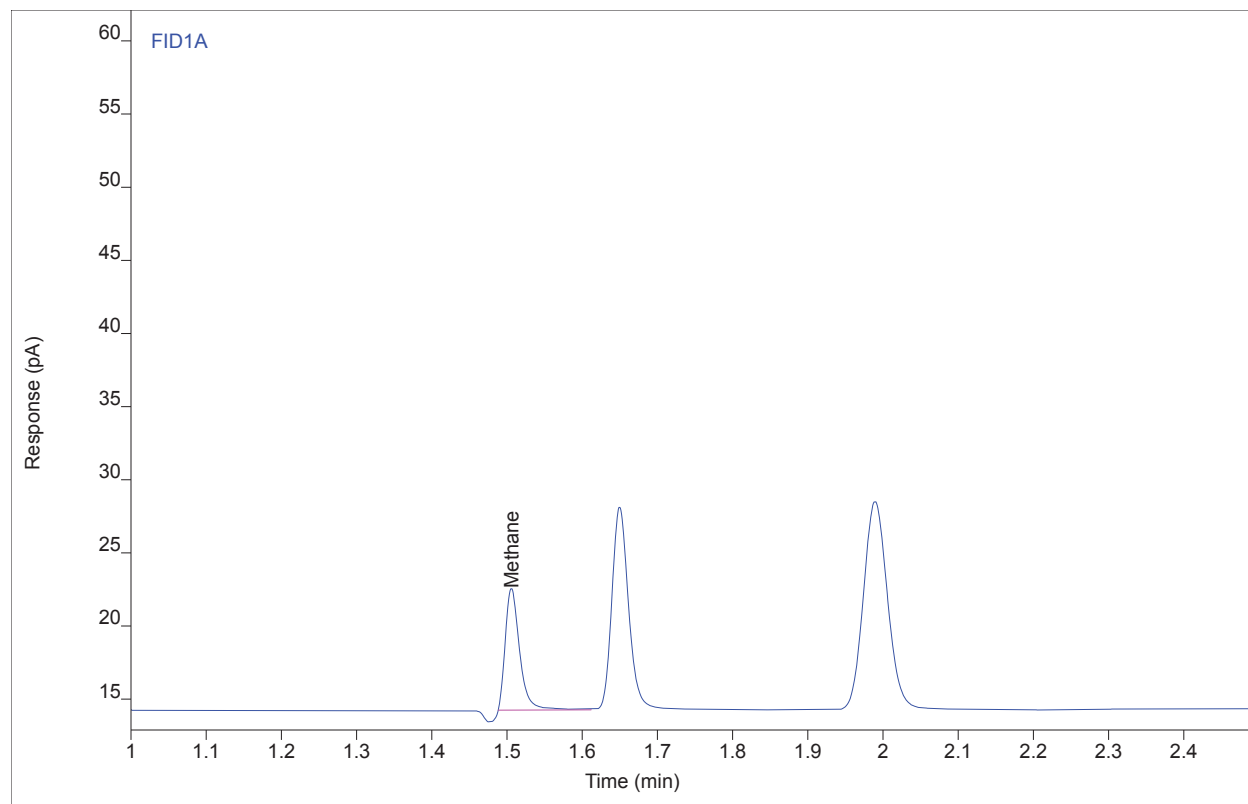


# Chromatogram Report

Sample Name Edithp1686 #C4 ENV(1=600,2=400)  
Sequence Name EDITHP1712 ver.2  
Inj Data File 002F0502.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/8/2019 12:41 PM  
File Modified 3/11/2019 8:06 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 2  
Injection Volume 250  
Injection 2 of 4  
Acquisition Method AQ\_EDITHP503\_HRVOC.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 3/8/2019 7:56 AM  
Printed 3/11/2019 9:56 AM



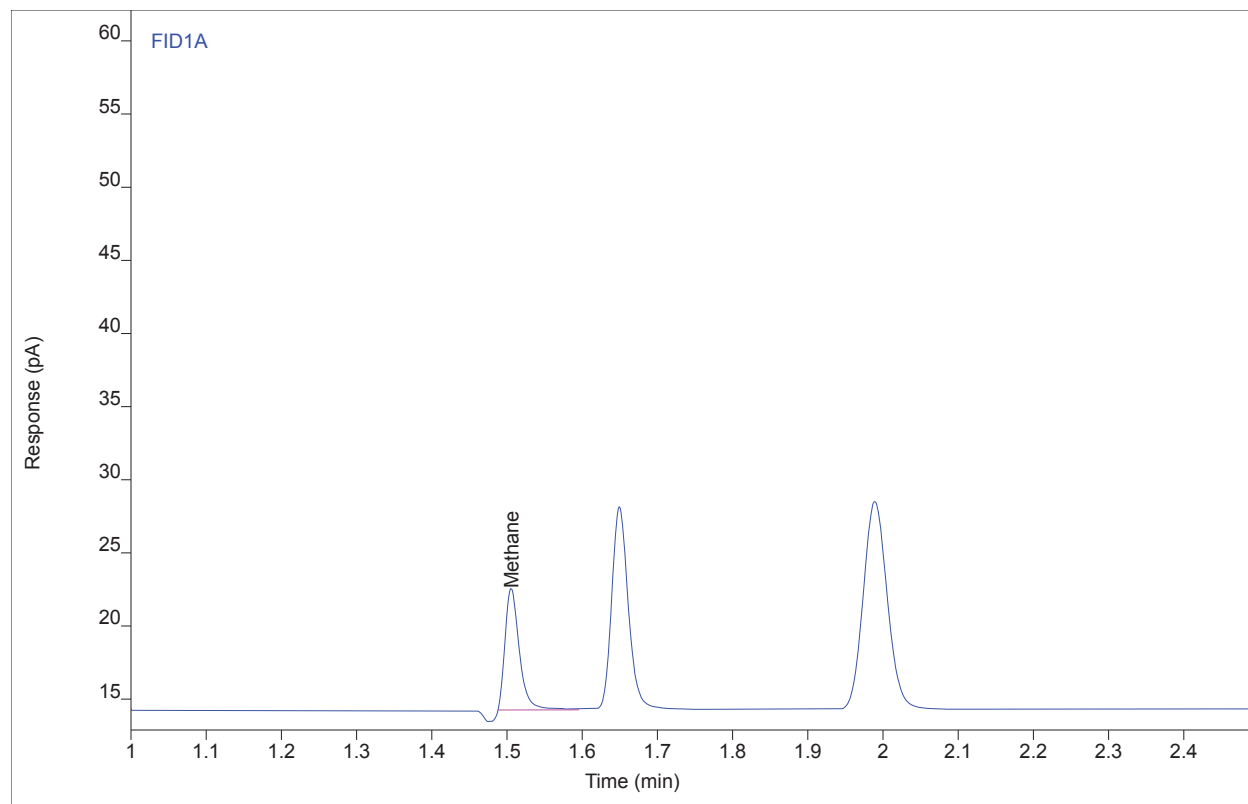
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | PB   | 1.51 | 11.1258 | 8.29219 | 40.8455 | 1  | 40.8455 | ppm  |

# Chromatogram Report

Sample Name Edithp1686 #C4 ENV(1=600,2=400)  
Sequence Name EDITHP1712 ver.2  
Inj Data File 002F0503.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/8/2019 12:57 PM  
File Modified 3/11/2019 8:06 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 2  
Injection Volume 250  
Injection 3 of 4  
Acquisition Method AQ\_EDITHP503\_HRVOC.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 3/8/2019 7:56 AM  
Printed 3/11/2019 9:56 AM



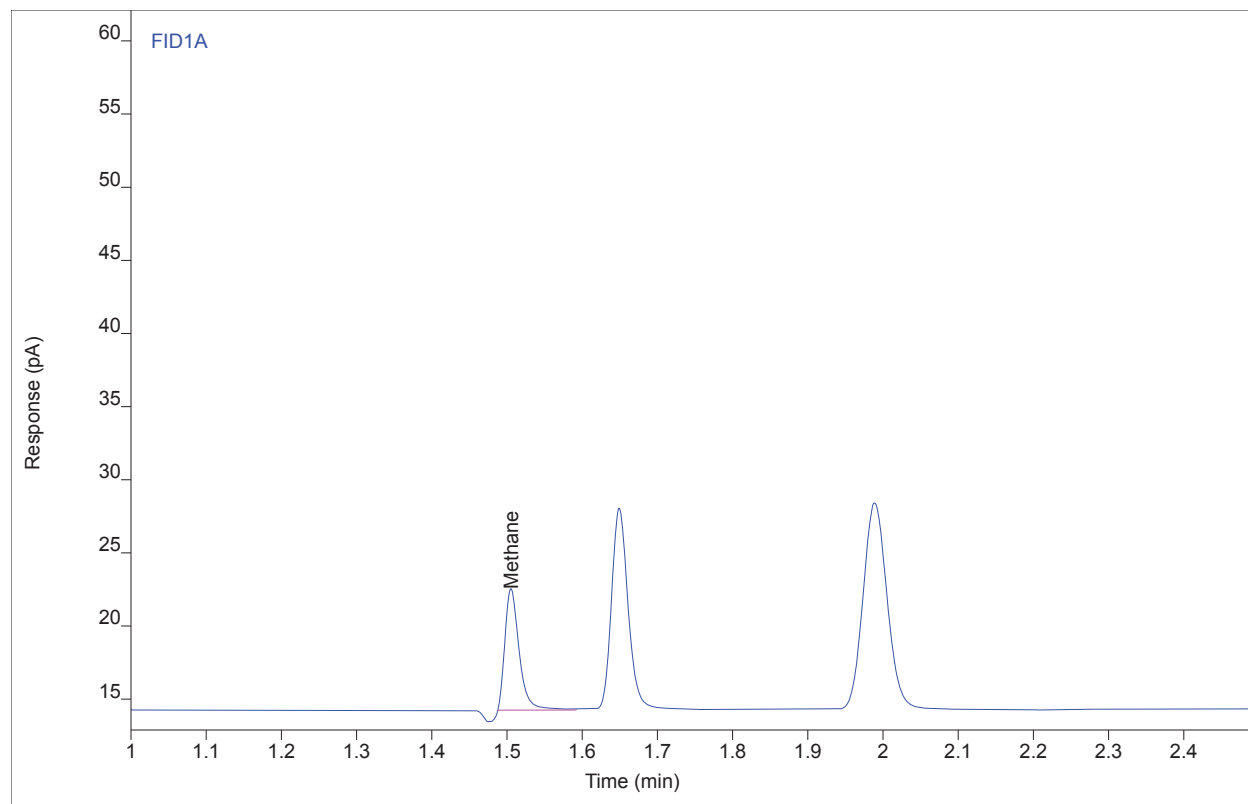
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | PB   | 1.51 | 11.0637 | 8.27260 | 40.6196 | 1  | 40.6196 | ppm  |

# Chromatogram Report

Sample Name Edithp1686 #C4 ENV(1=600,2=400)  
Sequence Name EDITHP1712 ver.2  
Inj Data File 002F0504.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/8/2019 1:13 PM  
File Modified 3/11/2019 8:06 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 2  
Injection Volume 250  
Injection 4 of 4  
Acquisition Method AQ\_EDITHP503\_HRVOC.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 3/8/2019 7:56 AM  
Printed 3/11/2019 9:56 AM



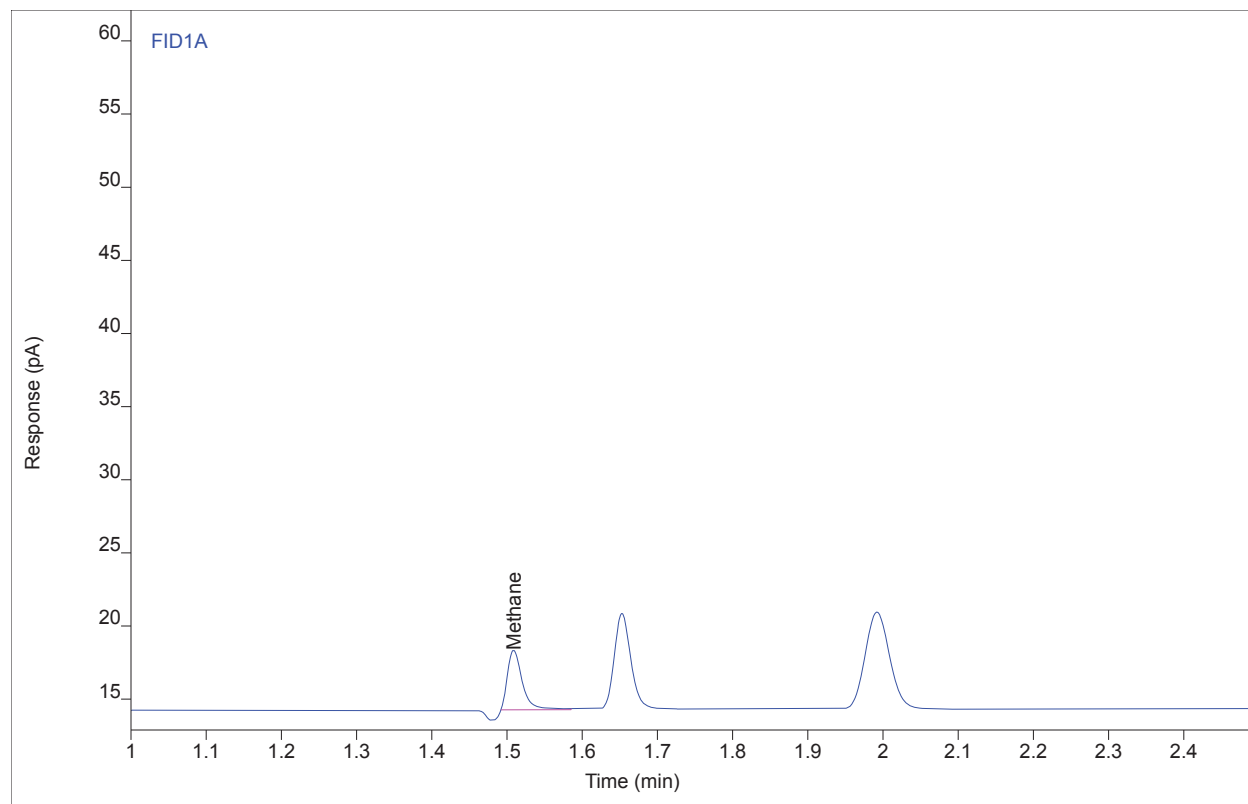
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | PB   | 1.51 | 11.0219 | 8.24959 | 40.4677 | 1  | 40.4677 | ppm  |

# Chromatogram Report

Sample Name 0319-054.RCO1-1 SP.Bag  
Sequence Name EDITHP1712 ver.2  
Inj Data File 003F0702.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/9/2019 12:35 PM  
File Modified 3/11/2019 8:06 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 3  
Injection Volume 250  
Injection 2 of 4  
Acquisition Method AQ\_EDITHP503\_HRVOC.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 3/8/2019 7:56 AM  
Printed 3/11/2019 9:56 AM



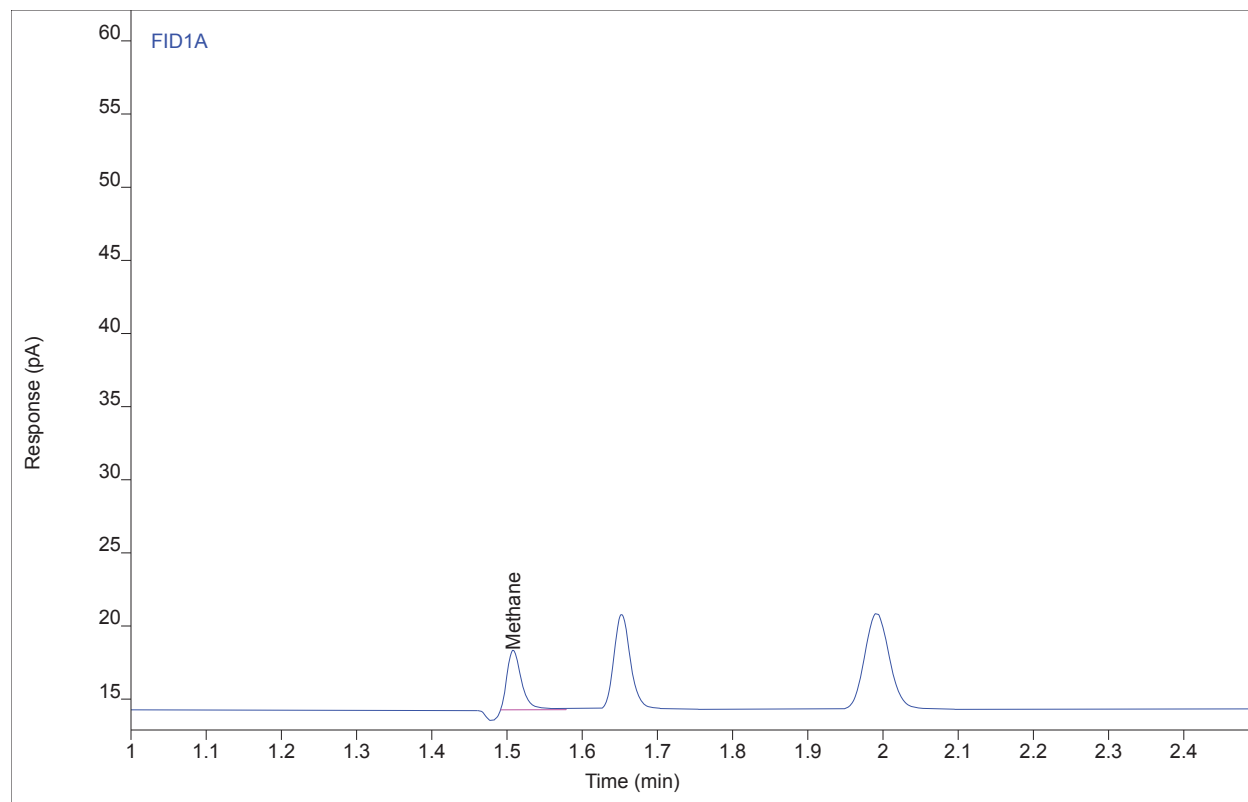
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | PB   | 1.51 | 5.64455 | 4.06970 | 20.9229 | 1  | 20.9229 | ppm  |

# Chromatogram Report

Sample Name 0319-054.RCO1-1 SP.Bag  
Sequence Name EDITHP1712 ver.2  
Inj Data File 003F0703.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/9/2019 12:50 PM  
File Modified 3/11/2019 8:06 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 3  
Injection Volume 250  
Injection 3 of 4  
Acquisition Method AQ\_EDITHP503\_HRVOC.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 3/8/2019 7:56 AM  
Printed 3/11/2019 9:56 AM



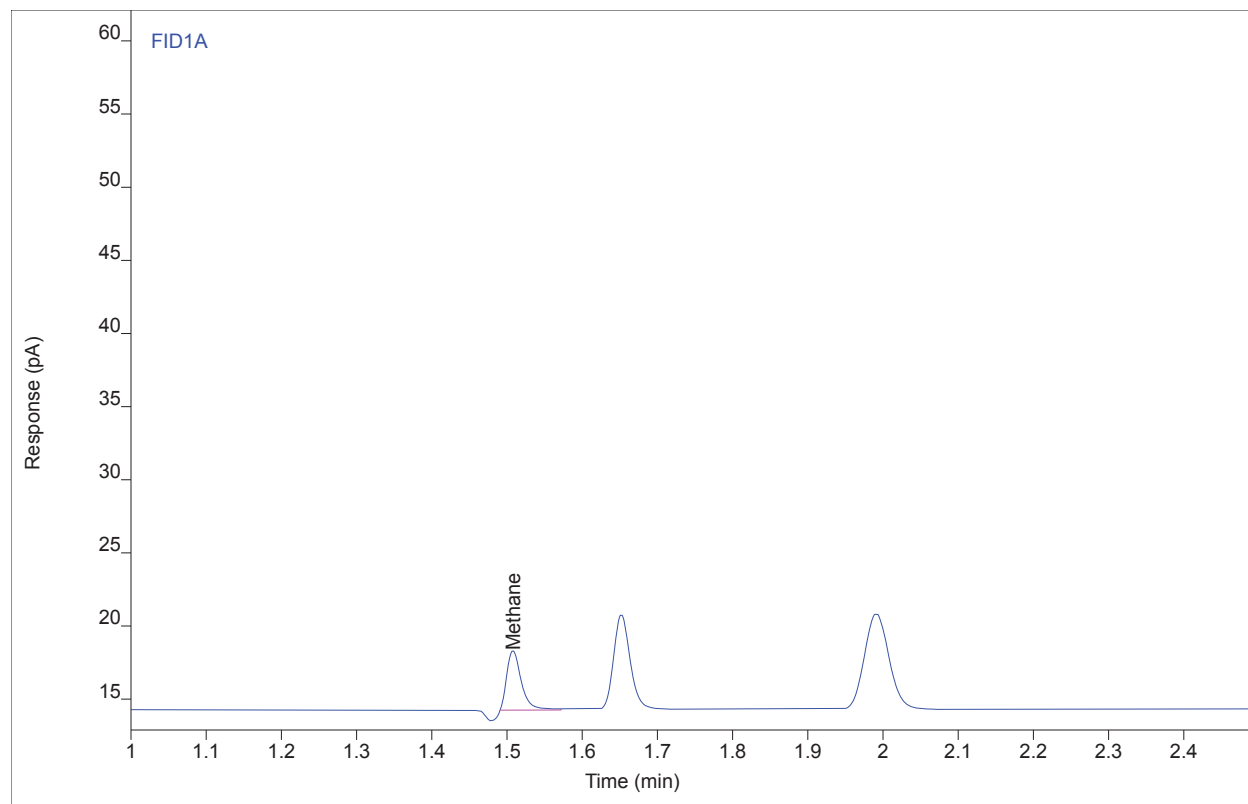
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | PB   | 1.51 | 5.47103 | 4.05220 | 20.2923 | 1  | 20.2923 | ppm  |

# Chromatogram Report

Sample Name 0319-054.RCO1-1 SP.Bag  
Sequence Name EDITHP1712 ver.2  
Inj Data File 003F0704.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/9/2019 1:04 PM  
File Modified 3/11/2019 8:06 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Sample  
Vial Number Vial 3  
Injection Volume 250  
Injection 4 of 4  
Acquisition Method AQ\_EDITHP503\_HRVOC.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 3/8/2019 7:56 AM  
Printed 3/11/2019 9:56 AM



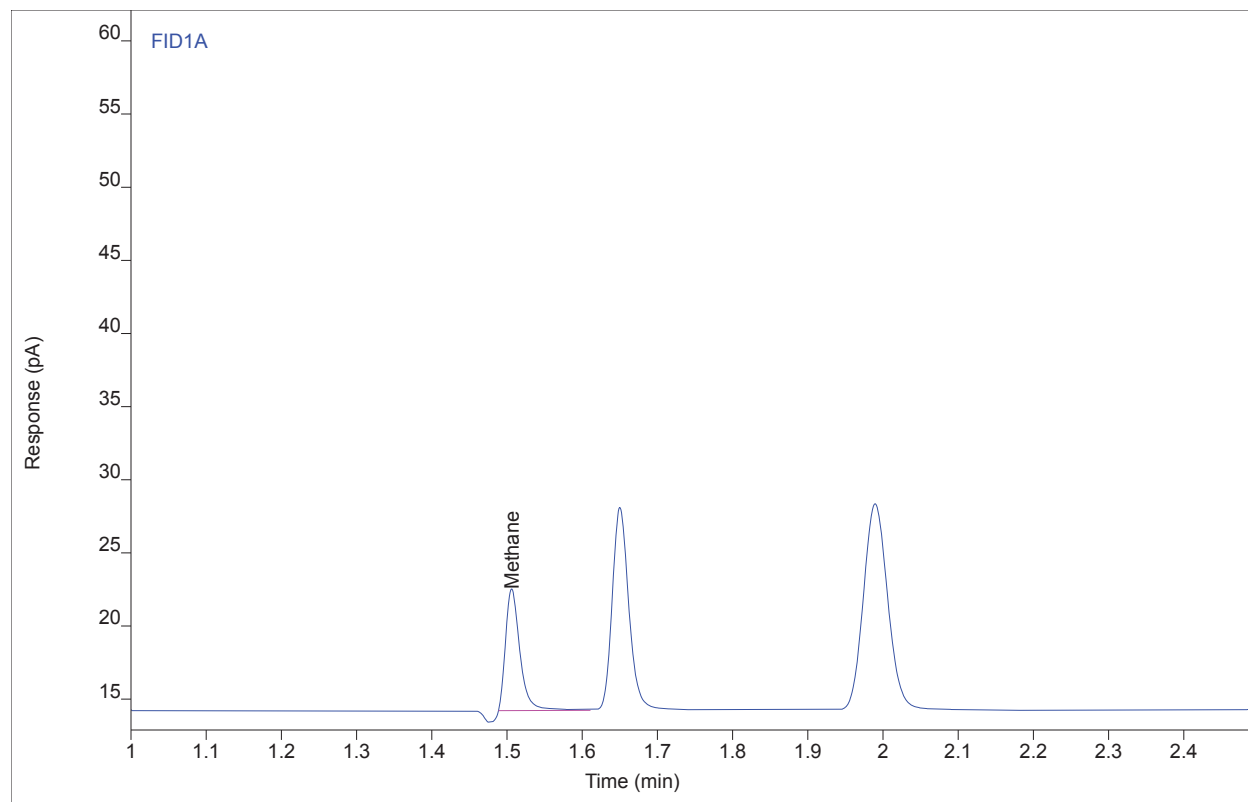
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | PB   | 1.51 | 5.49131 | 4.04236 | 20.3660 | 1  | 20.3660 | ppm  |

# Chromatogram Report

Sample Name Edithp1686 #C4 ENV(1=600,2=400)  
Sequence Name EDITHP1712 ver.2  
Inj Data File 002F0802.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/9/2019 1:36 PM  
File Modified 3/11/2019 8:06 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 2  
Injection Volume 250  
Injection 2 of 4  
Acquisition Method AQ\_EDITHP503\_HRVOC.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 3/8/2019 7:56 AM  
Printed 3/11/2019 9:56 AM



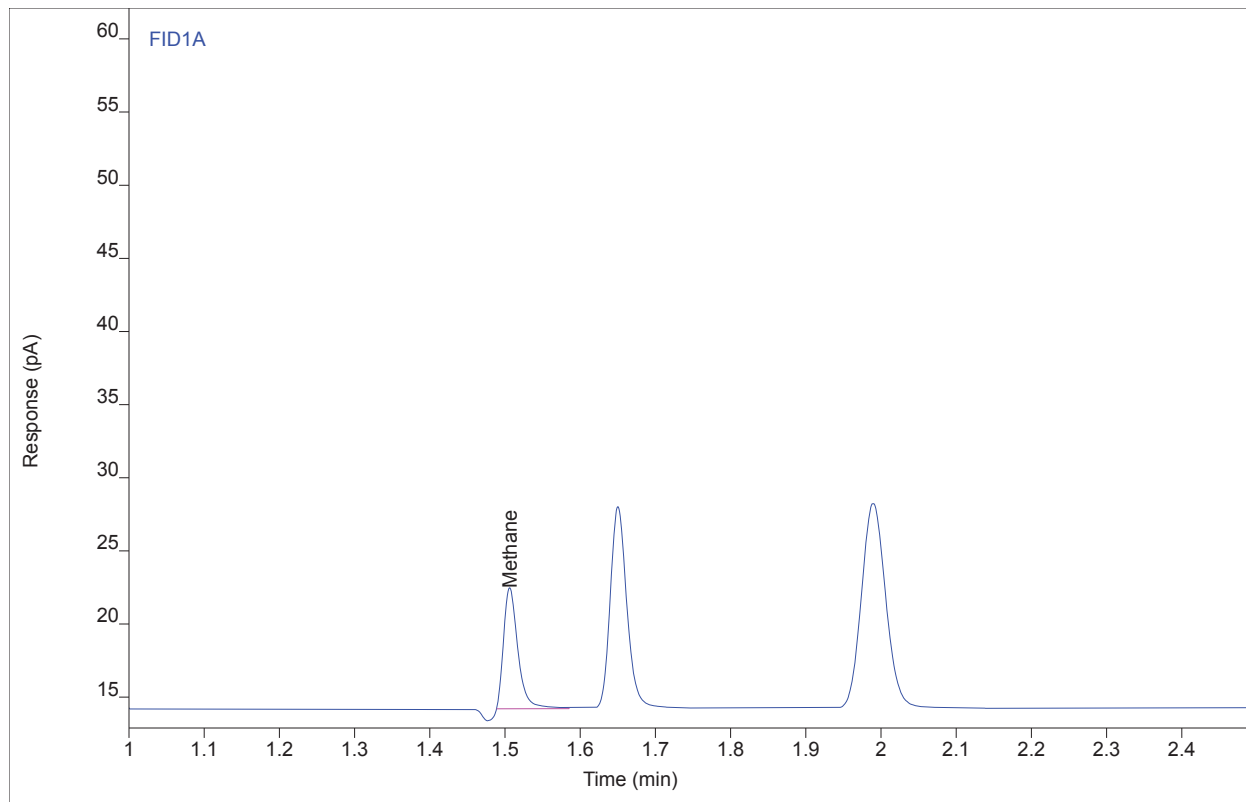
| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | PV   | 1.51 | 11.1332 | 8.28130 | 40.8722 | 1  | 40.8722 | ppm  |

# Chromatogram Report

Sample Name Edithp1686 #C4 ENV(1=600,2=400)  
Sequence Name EDITHP1712 ver.2  
Inj Data File 002F0803.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/9/2019 1:51 PM  
File Modified 3/11/2019 8:06 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 2  
Injection Volume 250  
Injection 3 of 4  
Acquisition Method AQ\_EDITHP503\_HRVOC.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 3/8/2019 7:56 AM  
Printed 3/11/2019 9:56 AM



| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | PB   | 1.51 | 11.0235 | 8.24143 | 40.4736 | 1  | 40.4736 | ppm  |

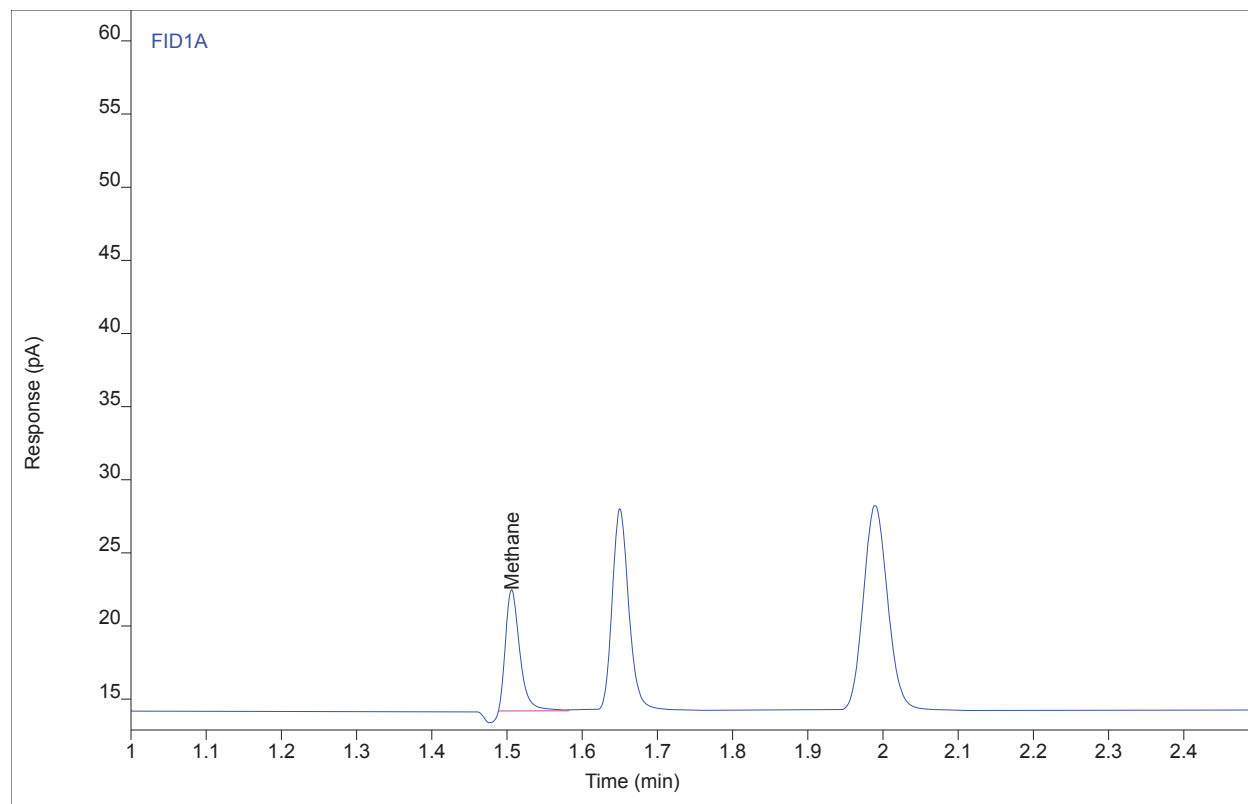


# Chromatogram Report

Sample Name Edithp1686 #C4 ENV(1=600,2=400)  
Sequence Name EDITHP1712 ver.2  
Inj Data File 002F0804.D  
File Location GC/2019/Edith/Quarter 1  
Injection Date 3/9/2019 2:07 PM  
File Modified 3/11/2019 8:06 AM  
Instrument  
Operator Justin Guenzler

# Enthalpy Analytical

Sample Type Calibration  
Vial Number Vial 2  
Injection Volume 250  
Injection 4 of 4  
Acquisition Method AQ\_EDITHP503\_HRVOC.M  
Analysis Method EDITHP1576F\_C1-C7.M  
Method Modified 3/8/2019 7:56 AM  
Printed 3/11/2019 9:56 AM



| Compound | Type | RT   | Area    | Height  | Amount  | DF | SampAmt | Unit |
|----------|------|------|---------|---------|---------|----|---------|------|
| Methane  | PB   | 1.51 | 11.0082 | 8.25576 | 40.4180 | 1  | 40.4180 | ppm  |

Enthalpy Analytical

Company: Air Control Techniques PC  
Job No.: 0319-054 EPA Method 18 (Bags)  
Client No.: 2333

Analysis Method: EDITHP1576F\_C1-C7.M

Methane -- Calibration Standards

| SAMPLE NAME                     | Filename<br>#1 | Filename<br>#2 | Filename<br>#3 | Ret<br>Time<br>(min) | Ret<br>Time<br>(min) | Ret<br>Time<br>(min) | %dif<br>RT | Conc<br># 1 | Conc<br># 2 | Conc<br># 3 | %dif<br>conc | Avg<br>Conc<br>(ppm) | Std<br>Tag<br>(ppm) | %<br>Tag |
|---------------------------------|----------------|----------------|----------------|----------------------|----------------------|----------------------|------------|-------------|-------------|-------------|--------------|----------------------|---------------------|----------|
| Edithp1686 #C4 ENV(1=600,2=400) | 002F0302.D     | 002F0303.D     | 002F0304.D     | 1.51                 | 1.51                 | 1.51                 | 0.0        | 41.4        | 41.5        | 41.4        | 0.2          | 41.4                 | 40.0                | 104      |
| Zero Air Blank                  | 016F0501.D     | 016F0502.D     | 016F0503.D     | NA                   | NA                   | NA                   | NA         | 0.510       | 0.510       | 0.510       | 0.0          | 0.510                | ND                  |          |
| Edithp1686 #C4 ENV(1=600,2=400) | 002F0502.D     | 002F0503.D     | 002F0504.D     | 1.51                 | 1.51                 | 1.51                 | 0.0        | 40.8        | 40.6        | 40.5        | 0.5          | 40.6                 | 40.0                | 102      |
| Edithp1686 #C4 ENV(1=600,2=400) | 002F0802.D     | 002F0803.D     | 002F0804.D     | 1.51                 | 1.51                 | 1.51                 | 0.0        | 40.9        | 40.5        | 40.4        | 0.7          | 40.6                 | 40.0                | 101      |

```
=====
                        Calibration Table
=====
```

Calib. Data Modified : 12/14/2018 9:50:22 AM

Rel. Reference Window : 0.000 %  
 Abs. Reference Window : 0.100 min  
 Rel. Non-ref. Window : 0.000 %  
 Abs. Non-ref. Window : 0.050 min  
 Uncalibrated Peaks : Separately calculated (see below)  
 Partial Calibration : Yes, identified peaks are recalibrated  
 Correct All Ret. Times: No, only for identified peaks

Curve Type : Linear  
 Origin : Connected  
 Weight : Quadratic (Amnt)

Recalibration Settings:  
 Average Response : Average all calibrations  
 Average Retention Time: Floating Average New 75%

Calibration Report Options :  
 Printout of recalibrations within a sequence:  
     Calibration Table after Recalibration  
     Normal Report after Recalibration  
 If the sequence is done with bracketing:  
     Results of first cycle (ending previous bracket)

Signal 1: FID1 A, Front Signal  
 Uncalibrated Peaks : using compound Propane  
 Signal 2: FID3 B, Back Signal  
 Uncalibrated Peaks : not reported

| RetTime | Lvl | Amount | Area       | Amt/Area   | Ref Grp Name |         |
|---------|-----|--------|------------|------------|--------------|---------|
| [min]   | Sig | [ppm]  |            |            |              |         |
| 1.504   | 1   | 1      | 5.10000    | 1.29160    | 3.94858      | Methane |
|         |     | 2      | 20.40000   | 5.52779    | 3.69045      |         |
|         |     | 3      | 40.80000   | 11.01984   | 3.70241      |         |
|         |     | 4      | 102.00000  | 27.69730   | 3.68267      |         |
|         |     | 5      | 2510.00000 | 684.59015  | 3.66643      |         |
|         |     | 6      | 7528.00000 | 2076.00431 | 3.62620      |         |
|         |     | 7      | 4.99600e4  | 1.39978e4  | 3.56913      |         |
| 1.643   | 1   | 1      | 5.10000    | 2.65259    | 1.92265      | Ethane  |
|         |     | 2      | 20.40000   | 10.88862   | 1.87352      |         |
|         |     | 3      | 40.80000   | 21.65314   | 1.88425      |         |
|         |     | 4      | 102.00000  | 54.30959   | 1.87812      |         |
|         |     | 5      | 2513.00000 | 1316.89852 | 1.90827      |         |
|         |     | 6      | 7537.00000 | 3991.51025 | 1.88826      |         |
|         |     | 7      | 5.00200e4  | 2.69156e4  | 1.85840      |         |
| 1.977   | 1   | 1      | 5.10000    | 3.92461    | 1.29949      | Propane |
|         |     | 2      | 20.40000   | 16.05077   | 1.27097      |         |
|         |     | 3      | 40.80000   | 32.02243   | 1.27411      |         |
|         |     | 4      | 102.00000  | 80.39683   | 1.26871      |         |
|         |     | 5      | 2518.00000 | 1976.26827 | 1.27412      |         |
|         |     | 6      | 7552.00000 | 5993.93441 | 1.25994      |         |
|         |     | 7      | 5.01200e4  | 4.04632e4  | 1.23866      |         |
| 2.906   | 1   | 1      | 5.10000    | 5.31357    | 9.59807e-1   | Butane  |
|         |     | 2      | 20.40000   | 21.42567   | 9.52129e-1   |         |
|         |     | 3      | 40.80000   | 42.59832   | 9.57784e-1   |         |
|         |     | 4      | 102.00000  | 107.09192  | 9.52453e-1   |         |

| RetTime<br>[min]                              | Lvl<br>Sig | Amount<br>[ppm] | Area       | Amt/Area   | Ref Grp Name |
|-----------------------------------------------|------------|-----------------|------------|------------|--------------|
| ----- --- --- ----- ----- ----- --- --- ----- |            |                 |            |            |              |
|                                               |            | 5 503.00000     | 520.91770  | 9.65604e-1 |              |
|                                               |            | 6 1508.00000    | 1582.14661 | 9.53135e-1 |              |
|                                               |            | 7 1.00100e4     | 1.07690e4  | 9.29517e-1 |              |
| 4.476                                         | 1          | 1 5.10000       | 6.70864    | 7.60214e-1 | Pentane      |
|                                               |            | 2 20.40000      | 26.59298   | 7.67120e-1 |              |
|                                               |            | 3 40.80000      | 52.75502   | 7.73386e-1 |              |
|                                               |            | 4 102.00000     | 131.93262  | 7.73122e-1 |              |
|                                               |            | 5 251.00000     | 313.40609  | 8.00878e-1 |              |
|                                               |            | 6 753.00000     | 956.22872  | 7.87469e-1 |              |
|                                               |            | 7 4998.00000    | 6587.28239 | 7.58735e-1 |              |
| 6.049                                         | 1          | 1 5.10000       | 7.79287    | 6.54445e-1 | Hexane       |
|                                               |            | 2 20.40000      | 31.50593   | 6.47497e-1 |              |
|                                               |            | 3 40.80000      | 62.78177   | 6.49870e-1 |              |
|                                               |            | 4 102.00000     | 157.50427  | 6.47601e-1 |              |
|                                               |            | 5 201.00000     | 275.12465  | 7.30578e-1 |              |
|                                               |            | 6 603.00000     | 841.54812  | 7.16537e-1 |              |
|                                               |            | 7 4000.00000    | 5994.54932 | 6.67273e-1 |              |
| 7.210                                         | 1          | 1 5.10000       | 8.83190    | 5.77452e-1 | Heptane      |
|                                               |            | 2 20.40000      | 35.93434   | 5.67702e-1 |              |
|                                               |            | 3 40.80000      | 71.82188   | 5.68072e-1 |              |
|                                               |            | 4 102.00000     | 181.16883  | 5.63011e-1 |              |

=====

Peak Sum Table

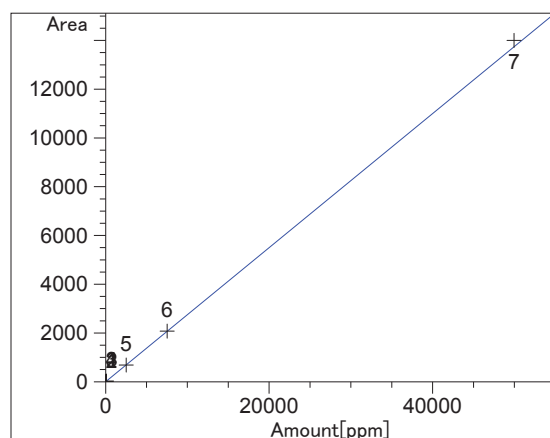
=====

| Name                                      | StartTime<br>[min] | EndTime<br>[min] | Use<br>Reference | Response<br>factor | Multiplier | ISTD<br>Peak |
|-------------------------------------------|--------------------|------------------|------------------|--------------------|------------|--------------|
| ----- ----- ----- ----- ----- ----- ----- |                    |                  |                  |                    |            |              |
| as Ethane                                 | 1.560              | 1.825            | None             | 1.8876             | 1.8876     | None         |
| as Propane                                | 1.825              | 2.500            | None             | 1.2694             | 1.2694     | None         |
| as Butane                                 | 2.500              | 3.600            | None             | 9.5292e-1          | 0.9529     | None         |
| as Pentane                                | 3.600              | 5.250            | None             | 7.7442e-1          | 0.7744     | None         |
| as Hexane                                 | 5.250              | 6.600            | None             | 6.7340e-1          | 0.6734     | None         |
| as Heptane                                | 6.600              | 16.300           | None             | 5.6906e-1          | 0.5691     | None         |

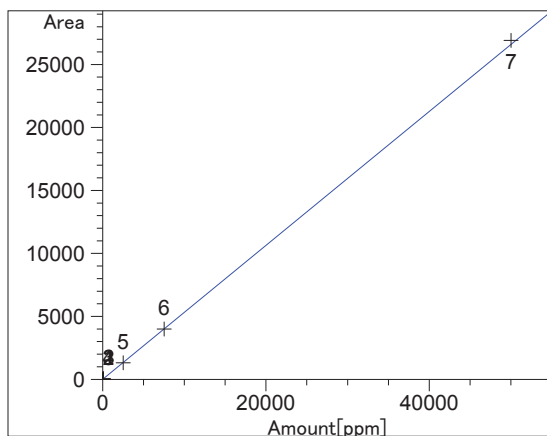
=====

Calibration Curves

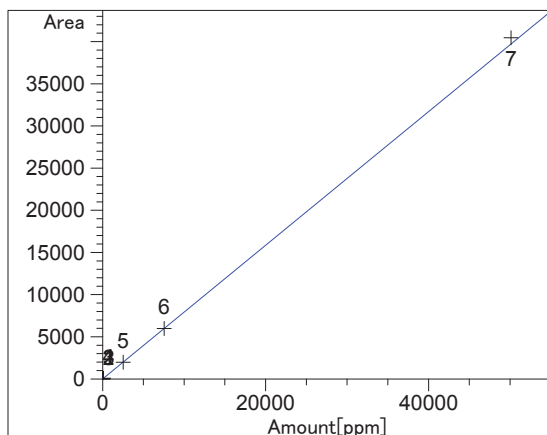
=====



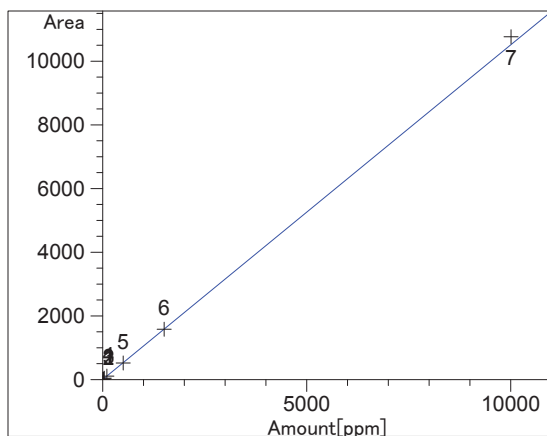
Methane at exp. RT: 1.504  
 FID1 A, Front Signal  
 Correlation: 0.99994  
 Residual Std. Dev.: 112.94523  
 Formula:  $y = mx + b$   
     m: 2.75130e-1  
     b: -1.11977e-1  
     x: Amount  
     y: Area  
 Calibration Level Weights:  
     Level 1 : 1  
     Level 2 : 0.0625  
     Level 3 : 0.015625  
     Level 4 : 0.0025  
     Level 5 : 4.12851e-006  
     Level 6 : 4.58967e-007  
     Level 7 : 1.04207e-008



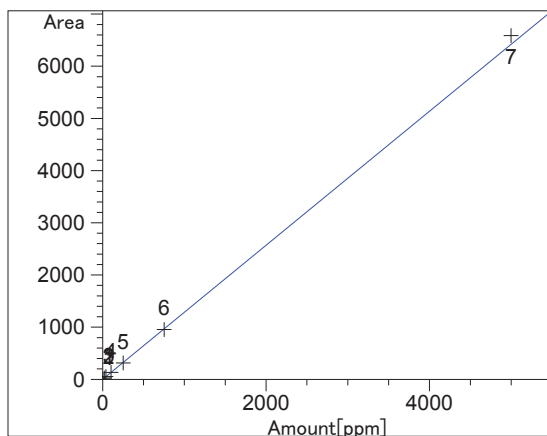
Ethane at exp. RT: 1.643  
FID1 A, Front Signal  
Correlation: 0.99996  
Residual Std. Dev.: 136.58627  
Formula:  $y = mx + b$   
m: 5.32016e-1  
b: -5.48544e-2  
x: Amount  
y: Area  
Calibration Level Weights:  
Level 1 : 1  
Level 2 : 0.0625  
Level 3 : 0.015625  
Level 4 : 0.0025  
Level 5 : 4.11865e-006  
Level 6 : 4.57871e-007  
Level 7 : 1.03957e-008



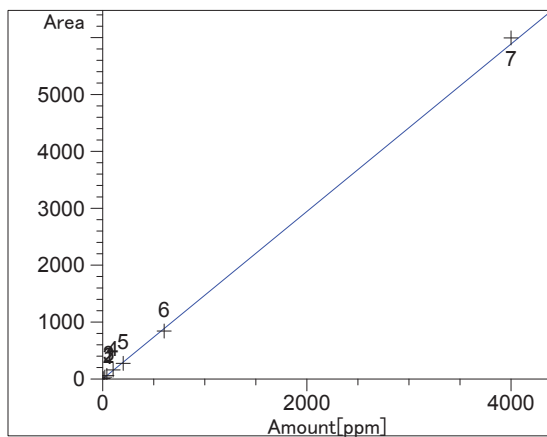
Propane at exp. RT: 1.977  
FID1 A, Front Signal  
Correlation: 0.99995  
Residual Std. Dev.: 325.64908  
Formula:  $y = mx + b$   
m: 7.92806e-1  
b: -1.22762e-1  
x: Amount  
y: Area  
Calibration Level Weights:  
Level 1 : 1  
Level 2 : 0.0625  
Level 3 : 0.015625  
Level 4 : 0.0025  
Level 5 : 4.10231e-006  
Level 6 : 4.56054e-007  
Level 7 : 1.03542e-008



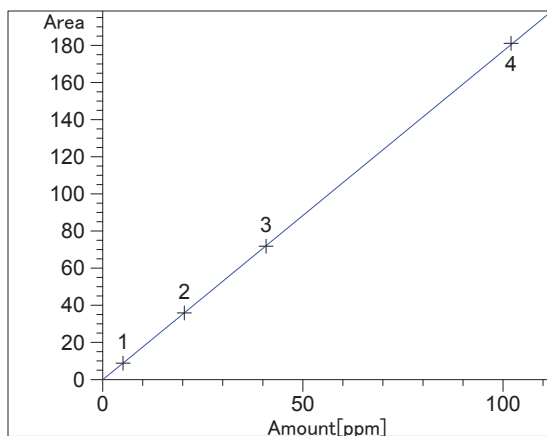
Butane at exp. RT: 2.906  
FID1 A, Front Signal  
Correlation: 0.99992  
Residual Std. Dev.: 108.08724  
Formula:  $y = mx + b$   
m: 1.05170  
b: -5.37354e-2  
x: Amount  
y: Area  
Calibration Level Weights:  
Level 1 : 1  
Level 2 : 0.0625  
Level 3 : 0.015625  
Level 4 : 0.0025  
Level 5 : 0.000103  
Level 6 : 0.000011  
Level 7 : 2.59581e-007



Pentane at exp. RT: 4.476  
FID1 A, Front Signal  
Correlation: 0.99983  
Residual Std. Dev.: 74.37563  
Formula:  $y = mx + b$   
m: 1.28480  
b: 1.69663e-1  
x: Amount  
y: Area  
Calibration Level Weights:  
Level 1 : 1  
Level 2 : 0.0625  
Level 3 : 0.015625  
Level 4 : 0.0025  
Level 5 : 0.000413  
Level 6 : 0.000046  
Level 7 : 1.04123e-006



Hexane at exp. RT: 6.049  
FID1 A, Front Signal  
Correlation: 0.99868  
Residual Std. Dev.: 52.04078  
Formula:  $y = mx + b$   
m: 1.47250  
b: 3.87249e-1  
x: Amount  
y: Area  
Calibration Level Weights:  
Level 1 : 1  
Level 2 : 0.0625  
Level 3 : 0.015625  
Level 4 : 0.0025  
Level 5 : 0.000644  
Level 6 : 0.000072  
Level 7 : 1.62562e-006



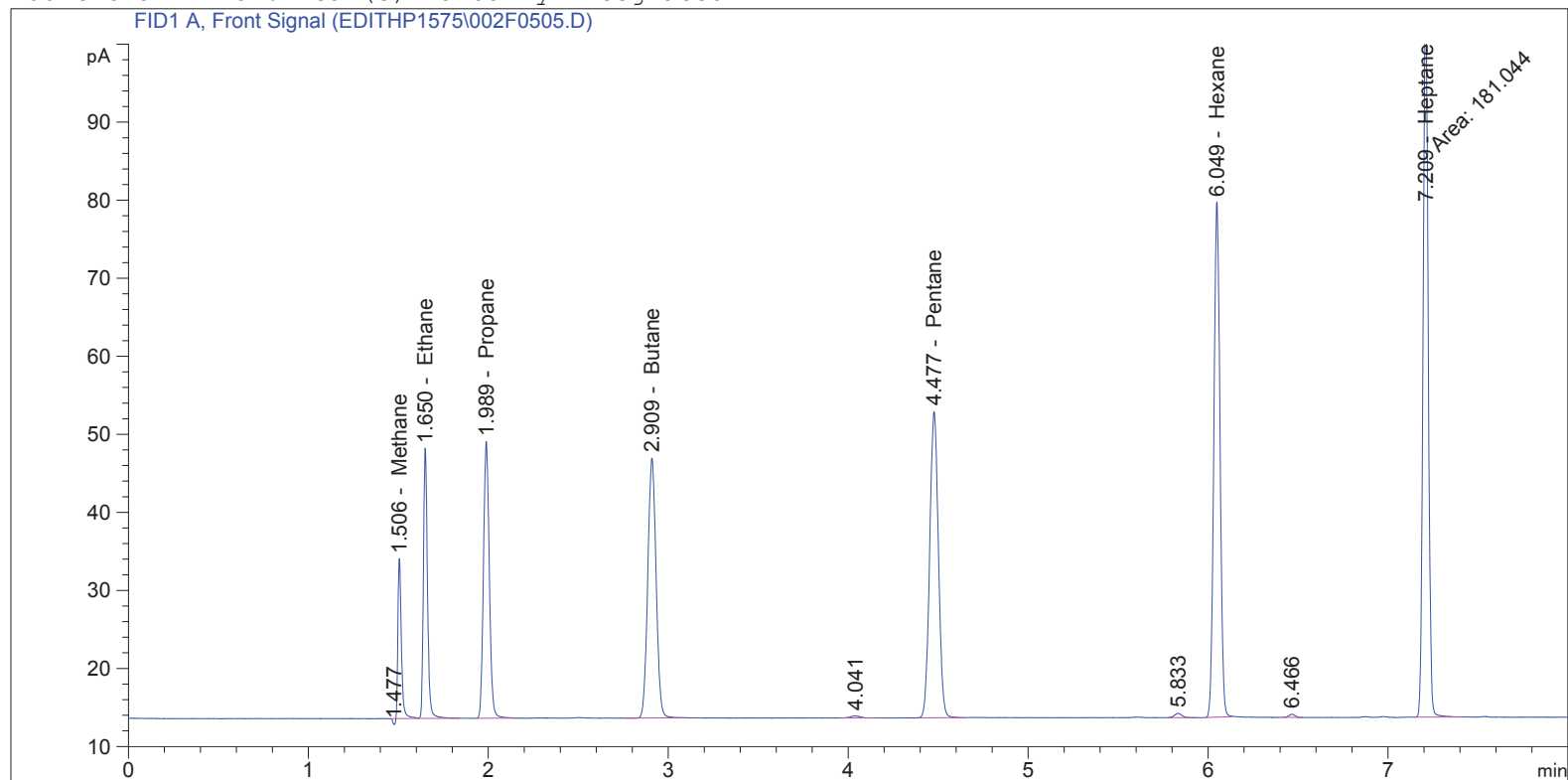
Heptane at exp. RT: 7.210  
FID1 A, Front Signal  
Correlation: 0.99999  
Residual Std. Dev.: 0.48764  
Formula:  $y = mx + b$   
m: 1.77197  
b: -2.08074e-1  
x: Amount  
y: Area  
Calibration Level Weights:  
Level 1 : 1  
Level 2 : 0.0625  
Level 3 : 0.015625  
Level 4 : 0.0025

=====

=====

|                 |                         |            |          |
|-----------------|-------------------------|------------|----------|
| Acq. Operator   | : Nicholas Traversa     | Seq. Line  | : 5      |
| Acq. Instrument | : Edith                 | Location   | : Vial 2 |
| Injection Date  | : 11/26/2018 5:22:11 PM | Inj        | : 5      |
|                 |                         | Inj Volume | : 250 µl |

Acq. Method : C:\GC\2018\EDITH\QUARTER 4\EDITHP1575\AQ\_EDITHP503\_HRVOC.M  
Last changed : 8/14/2017 12:18:06 PM by Nicholas Traversa  
Analysis Method : C:\GC\2018\EDITH\METHODS\EDITHP1576F\_C1-C7.M  
Last changed : 12/14/2018 9:51:41 AM by Nicole West  
ECM Server : http://s022vas01/Enthalpy  
ECM Operator : Nicole West  
ECM Path : GC\2018\Edith\Quarter 4\EDITHP1575.SC.SSIzip  
ECM Version : 3 (modified after loading)  
Additional Info : Peak(s) manually integrated



=====

External Standard Report

=====

Sorted By : Signal  
Calib. Data Modified : 12/14/2018 9:50:22 AM  
Multiplier : 1.0000  
Dilution : 1.0000  
Use Multiplier & Dilution Factor with ISTDs

Signal 1: FID1 A, Front Signal

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area   | Amount<br>[ppm] | Grp | Name    |
|------------------|------|----------------|------------|-----------------|-----|---------|
| 1.506            | PV   | 27.70986       | 3.64934    | 101.12263       |     | Methane |
| 1.650            | VB   | 54.33673       | 1.88154    | 102.23680       |     | Ethane  |
| 1.989            | BB   | 80.35818       | 1.26327    | 101.51406       |     | Propane |
| 2.909            | BB   | 107.06507      | 9.51315e-1 | 101.85257       |     | Butane  |
| 4.477            | BB   | 131.90427      | 7.77327e-1 | 102.53277       |     | Pentane |
| 6.049            | BB   | 157.39224      | 6.77446e-1 | 106.62477       |     | Hexane  |
| 7.209            | MM   | 181.04440      | 5.64993e-1 | 102.28874       |     | Heptane |

Totals : 718.17235

Uncalibrated Peaks : using compound Propane

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area | Amount<br>[ppm] | Grp | Name |
|------------------|------|----------------|----------|-----------------|-----|------|
| 1.477            | BP N | 7.25178e-1     | 1.30084  | 9.43339e-1      | ?   |      |
| 4.041            | BB   | 1.00411        | 1.30084  | 1.30619         | ?   |      |
| 5.833            | BB   | 1.59848        | 1.30084  | 2.07936         | ?   |      |
| 6.466            | BB   | 9.82327e-1     | 1.30084  | 1.27785         | ?   |      |

Uncalib. totals : 5.60673

# Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name       | Start Time<br>[min] | End Time<br>[min] | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|---------------------|-------------------|----------------------|-----------------|
| as Pentane | 3.600               | 5.250             | 1.00411              | 0.7776          |
| as Hexane  | 5.250               | 6.600             | 2.58080              | 1.7379          |

Totals : 2.5155

1 Warnings or Errors :

Warning : Reference compound(s) not found

# Final Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name       | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|----------------------|-----------------|
| as Pentane | 1.00411              | 0.7776          |
| as Hexane  | 2.58080              | 1.7379          |
| Methane    | 27.70986             | 101.1226        |
| Ethane     | 54.33673             | 102.2368        |
| Propane    | 80.35818             | 101.5141        |
| Butane     | 107.06507            | 101.8526        |
| Pentane    | 131.90427            | 102.5328        |
| Hexane     | 157.39224            | 106.6248        |
| Heptane    | 181.04440            | 102.2887        |

Totals : 720.6879

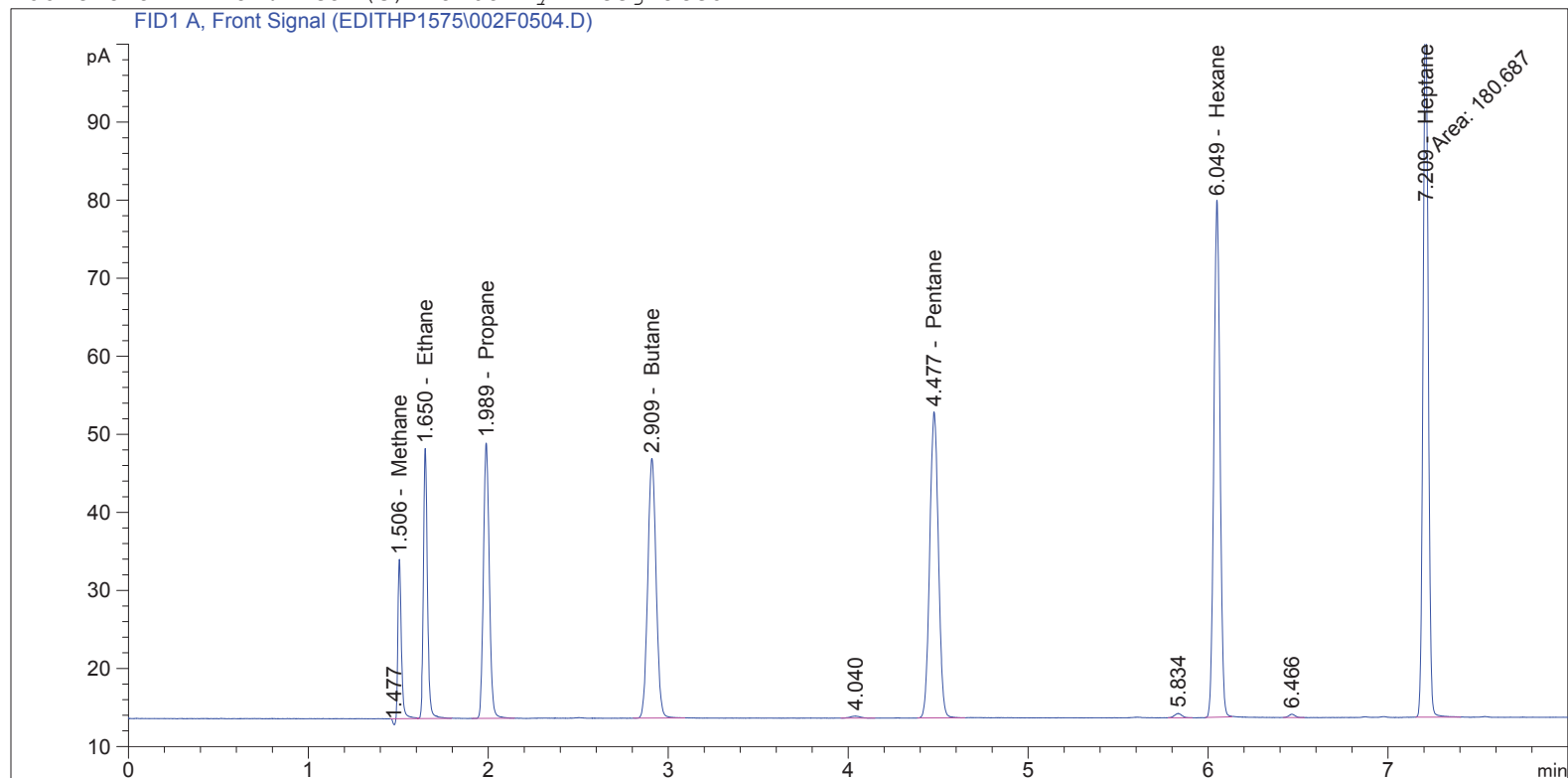
\*\*\* End of Report \*\*\*



=====

Acq. Operator : Nicholas Traversa Seq. Line : 5  
Acq. Instrument : Edith Location : Vial 2  
Injection Date : 11/26/2018 5:05:14 PM Inj : 4  
Inj Volume : 250 µl

Acq. Method : C:\GC\2018\EDITH\QUARTER 4\EDITHP1575\AQ\_EDITHP503\_HRVOC.M  
Last changed : 8/14/2017 12:18:06 PM by Nicholas Traversa  
Analysis Method : C:\GC\2018\EDITH\METHODS\EDITHP1576F\_C1-C7.M  
Last changed : 12/14/2018 9:51:41 AM by Nicole West  
ECM Server : http://s022vas01/Enthalpy  
ECM Operator : Nicole West  
ECM Path : GC\2018\Edith\Quarter 4\EDITHP1575.SC.SSIzip  
ECM Version : 3 (modified after loading)  
Additional Info : Peak(s) manually integrated



External Standard Report

Sorted By : Signal  
Calib. Data Modified : 12/14/2018 9:50:22 AM  
Multiplier : 1.0000  
Dilution : 1.0000  
Use Multiplier & Dilution Factor with ISTDs

Signal 1: FID1 A, Front Signal

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area   | Amount<br>[ppm] | Grp | Name    |
|------------------|------|----------------|------------|-----------------|-----|---------|
| 1.506            | PV   | 27.66279       | 3.64936    | 100.95155       |     | Methane |
| 1.650            | VB   | 54.24749       | 1.88154    | 102.06906       |     | Ethane  |
| 1.989            | PB   | 80.15423       | 1.26327    | 101.25680       |     | Propane |
| 2.909            | BB   | 106.83001      | 9.51316e-1 | 101.62907       |     | Butane  |
| 4.477            | BB   | 131.70012      | 7.77326e-1 | 102.37388       |     | Pentane |
| 6.049            | BB   | 157.16905      | 6.77444e-1 | 106.47320       |     | Hexane  |
| 7.209            | MM   | 180.68741      | 5.64994e-1 | 102.08727       |     | Heptane |

Totals : 716.84083

Uncalibrated Peaks : using compound Propane

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area | Amount<br>[ppm] | Grp | Name |
|------------------|------|----------------|----------|-----------------|-----|------|
| 1.477            | BP N | 7.29872e-1     | 1.30084  | 9.49446e-1      | ?   |      |
| 4.040            | BB   | 1.03790        | 1.30084  | 1.35013         | ?   |      |
| 5.834            | BB   | 1.55590        | 1.30084  | 2.02397         | ?   |      |
| 6.466            | BB   | 1.04231        | 1.30084  | 1.35588         | ?   |      |

Uncalib. totals : 5.67943

Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name       | Start Time<br>[min] | End Time<br>[min] | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|---------------------|-------------------|----------------------|-----------------|
| as Pentane | 3.600               | 5.250             | 1.03790              | 0.8038          |
| as Hexane  | 5.250               | 6.600             | 2.59821              | 1.7496          |

Totals : 2.5534

1 Warnings or Errors :

Warning : Reference compound(s) not found

Final Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name       | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|----------------------|-----------------|
| as Pentane | 1.03790              | 0.8038          |
| as Hexane  | 2.59821              | 1.7496          |
| Methane    | 27.66279             | 100.9515        |
| Ethane     | 54.24749             | 102.0691        |
| Propane    | 80.15423             | 101.2568        |
| Butane     | 106.83001            | 101.6291        |
| Pentane    | 131.70012            | 102.3739        |
| Hexane     | 157.16905            | 106.4732        |
| Heptane    | 180.68741            | 102.0873        |

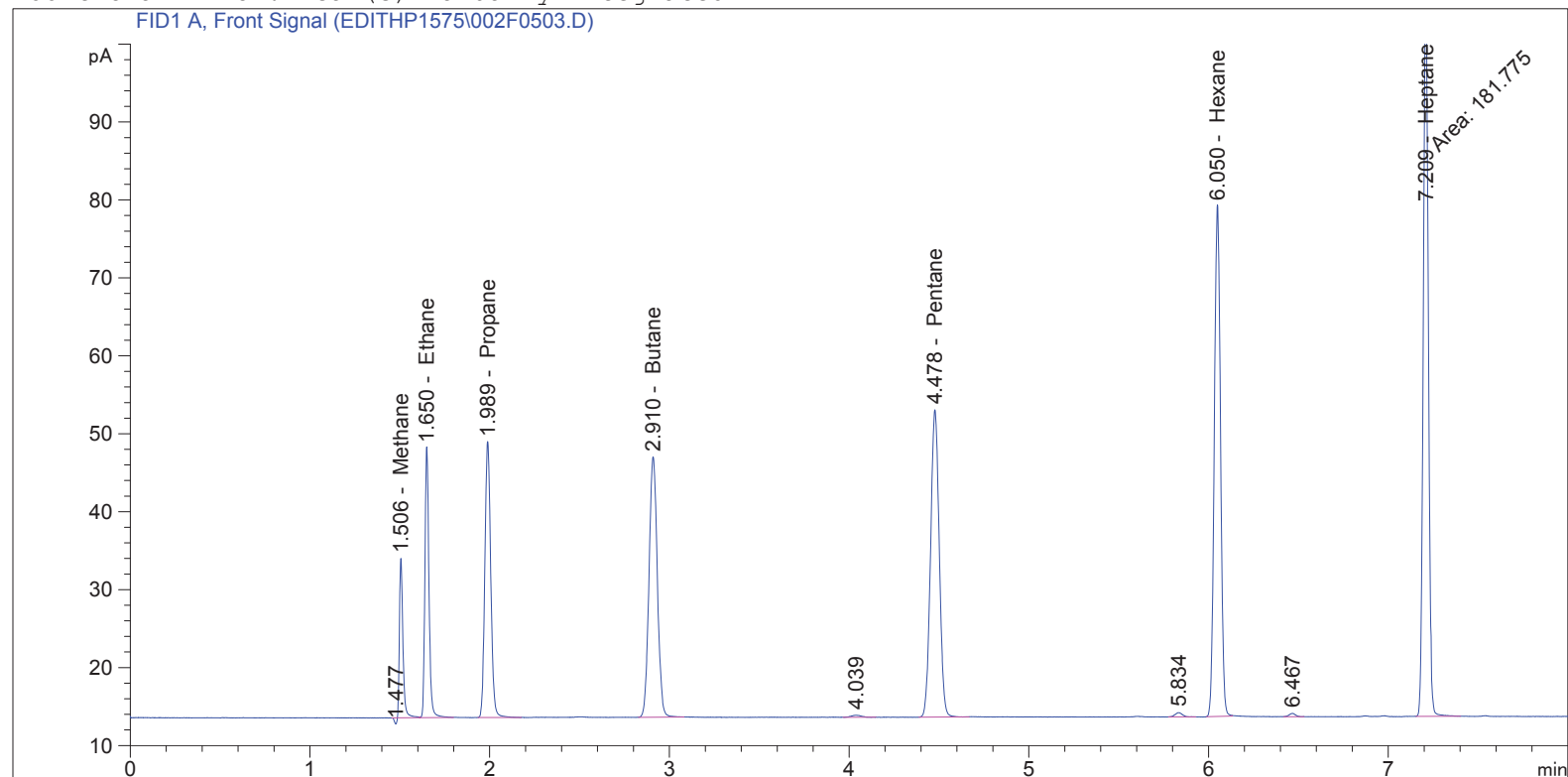
Totals : 719.3942

\*\*\* End of Report \*\*\*

```

=====
Acq. Operator   : Nicholas Traversa          Seq. Line :    5
Acq. Instrument : Edith                     Location  : Vial 2
Injection Date  : 11/26/2018 4:48:22 PM      Inj       :    3
                                           Inj Volume: 250 µl
Acq. Method     : C:\GC\2018\EDITH\QUARTER 4\EDITHP1575\AQ_EDITHP503_HRVOC.M
Last changed    : 8/14/2017 12:18:06 PM by Nicholas Traversa
Analysis Method : C:\GC\2018\EDITH\METHODS\EDITHP1576F_C1-C7.M
Last changed    : 12/14/2018 9:51:41 AM by Nicole West
ECM Server      : http://s022vas01/Enthalpy
ECM Operator    : Nicole West
ECM Path        : GC\2018\Edith\Quarter 4\EDITHP1575.SC.SSIzip
ECM Version     : 3 (modified after loading)
Additional Info  : Peak(s) manually integrated
=====

```



External Standard Report

```

=====
Sorted By       : Signal
Calib. Data Modified : 12/14/2018 9:50:22 AM
Multiplier      : 1.0000
Dilution        : 1.0000
Use Multiplier & Dilution Factor with ISTDs
=====

```

Signal 1: FID1 A, Front Signal

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area   | Amount<br>[ppm] | Grp | Name    |
|------------------|------|----------------|------------|-----------------|-----|---------|
| 1.506            | PV   | 27.71927       | 3.64933    | 101.15684       |     | Methane |
| 1.650            | VB   | 54.34456       | 1.88154    | 102.25151       |     | Ethane  |
| 1.989            | BB   | 80.67809       | 1.26326    | 101.91757       |     | Propane |
| 2.910            | BB   | 107.38068      | 9.51313e-1 | 102.15267       |     | Butane  |
| 4.478            | BB   | 132.19347      | 7.77329e-1 | 102.75786       |     | Pentane |
| 6.050            | BB   | 157.95152      | 6.77452e-1 | 107.00459       |     | Hexane  |
| 7.209            | MM   | 181.77467      | 5.64990e-1 | 102.70087       |     | Heptane |

Totals : 719.94191

Uncalibrated Peaks : using compound Propane

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area | Amount<br>[ppm] | Grp | Name |
|------------------|------|----------------|----------|-----------------|-----|------|
| 1.477            | BP N | 7.39343e-1     | 1.30084  | 9.61766e-1      | ?   |      |
| 4.039            | BB   | 1.00726        | 1.30084  | 1.31028         | ?   |      |
| 5.834            | BB   | 1.56231        | 1.30084  | 2.03232         | ?   |      |
| 6.467            | BB   | 1.01105        | 1.30084  | 1.31522         | ?   |      |

Uncalib. totals : 5.61958

Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name       | Start Time<br>[min] | End Time<br>[min] | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|---------------------|-------------------|----------------------|-----------------|
| as Pentane | 3.600               | 5.250             | 1.00726              | 0.7800          |
| as Hexane  | 5.250               | 6.600             | 2.57336              | 1.7329          |

Totals : 2.5129

1 Warnings or Errors :

Warning : Reference compound(s) not found

Final Summed Peaks Report

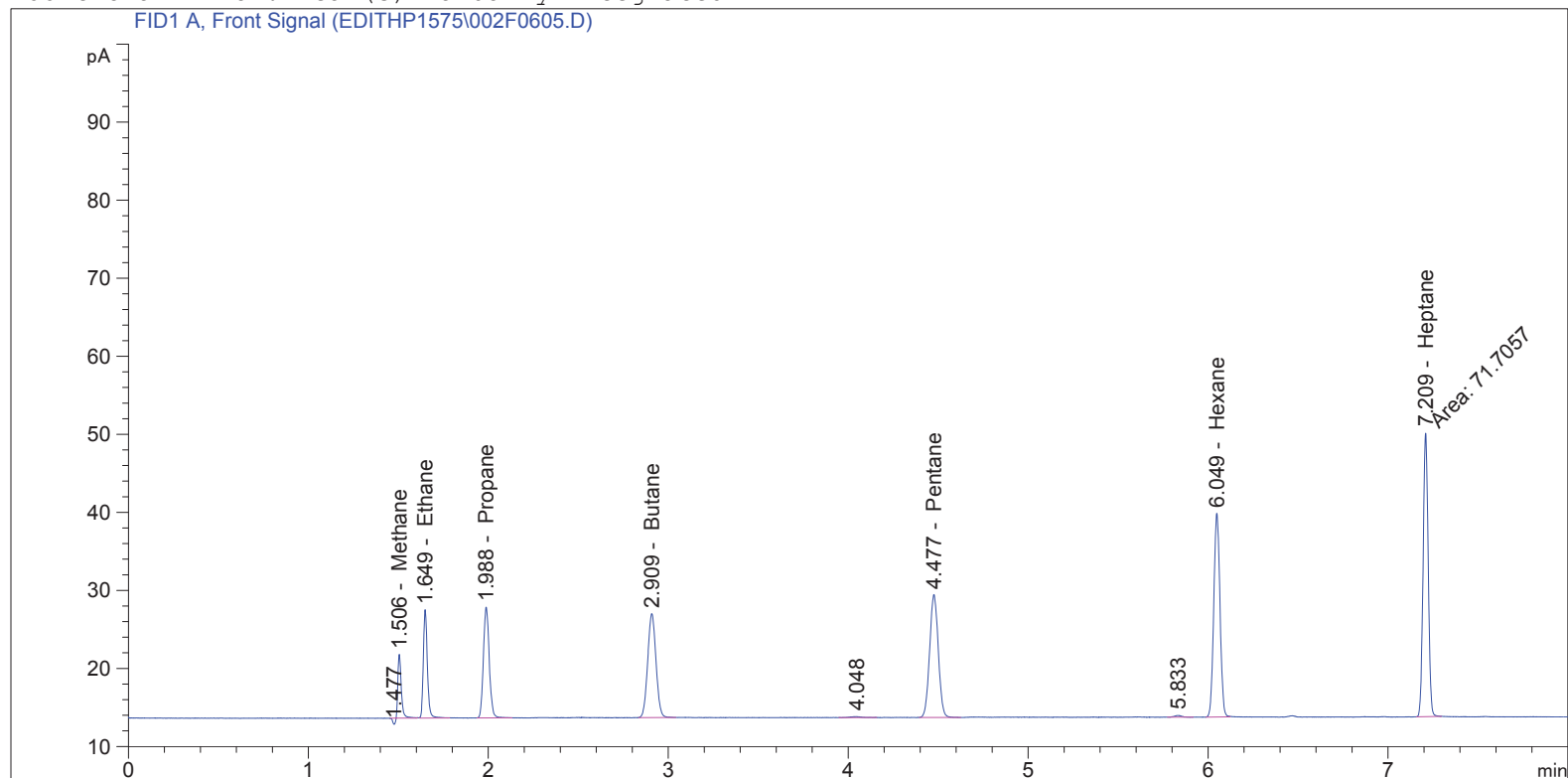
Signal 1: FID1 A, Front Signal

| Name       | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|----------------------|-----------------|
| as Pentane | 1.00726              | 0.7800          |
| as Hexane  | 2.57336              | 1.7329          |
| Methane    | 27.71927             | 101.1568        |
| Ethane     | 54.34456             | 102.2515        |
| Propane    | 80.67809             | 101.9176        |
| Butane     | 107.38068            | 102.1527        |
| Pentane    | 132.19347            | 102.7579        |
| Hexane     | 157.95152            | 107.0046        |
| Heptane    | 181.77467            | 102.7009        |

Totals : 722.4548

\*\*\* End of Report \*\*\*

=====  
Acq. Operator : Nicholas Traversa Seq. Line : 6  
Acq. Instrument : Edith Location : Vial 2  
Injection Date : 11/26/2018 6:46:11 PM Inj : 5  
Inj Volume : 250 µl  
Acq. Method : C:\GC\2018\EDITH\QUARTER 4\EDITHP1575\AQ\_EDITHP503\_HRVOC.M  
Last changed : 8/14/2017 12:18:06 PM by Nicholas Traversa  
Analysis Method : C:\GC\2018\EDITH\METHODS\EDITHP1576F\_C1-C7.M  
Last changed : 12/14/2018 9:51:41 AM by Nicole West  
ECM Server : http://s022vas01/Enthalpy  
ECM Operator : Nicole West  
ECM Path : GC\2018\Edith\Quarter 4\EDITHP1575.SC.SSIzip  
ECM Version : 3 (modified after loading)  
Additional Info : Peak(s) manually integrated



=====  
External Standard Report  
=====

Sorted By : Signal  
Calib. Data Modified : 12/14/2018 9:50:22 AM  
Multiplier : 1.0000  
Dilution : 1.0000  
Use Multiplier & Dilution Factor with ISTDs

Signal 1: FID1 A, Front Signal

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area   | Amount<br>[ppm] | Grp | Name    |
|------------------|------|----------------|------------|-----------------|-----|---------|
| 1.506            | PB   | 10.99815       | 3.67166    | 40.38143        |     | Methane |
| 1.649            | BB   | 21.63459       | 1.88441    | 40.76843        |     | Ethane  |
| 1.988            | BB   | 32.01132       | 1.26618    | 40.53209        |     | Propane |
| 2.909            | BB   | 42.57405       | 9.52038e-1 | 40.53210        |     | Butane  |
| 4.477            | BB   | 52.74920       | 7.75825e-1 | 40.92414        |     | Pentane |
| 6.049            | BB   | 62.75278       | 6.74926e-1 | 42.35350        |     | Hexane  |
| 7.209            | MM   | 71.70566       | 5.65982e-1 | 40.58408        |     | Heptane |

Totals : 286.07578

Uncalibrated Peaks : using compound Propane

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area | Amount<br>[ppm] | Grp | Name |
|------------------|------|----------------|----------|-----------------|-----|------|
| 1.477            | BP N | 7.87896e-1     | 1.30084  | 1.02492         | ?   |      |
| 4.048            | BB   | 4.30614e-1     | 1.30084  | 5.60159e-1      | ?   |      |
| 5.833            | BB   | 5.81095e-1     | 1.30084  | 7.55911e-1      | ?   |      |

Uncalib. totals : 2.34099

Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name       | Start Time<br>[min] | End Time<br>[min] | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|---------------------|-------------------|----------------------|-----------------|
| as Pentane | 3.600               | 5.250             | 4.30614e-1           | 0.3335          |
| as Hexane  | 5.250               | 6.600             | 5.81095e-1           | 0.3913          |

Totals : 7.2478e-1

1 Warnings or Errors :

Warning : Reference compound(s) not found

Final Summed Peaks Report

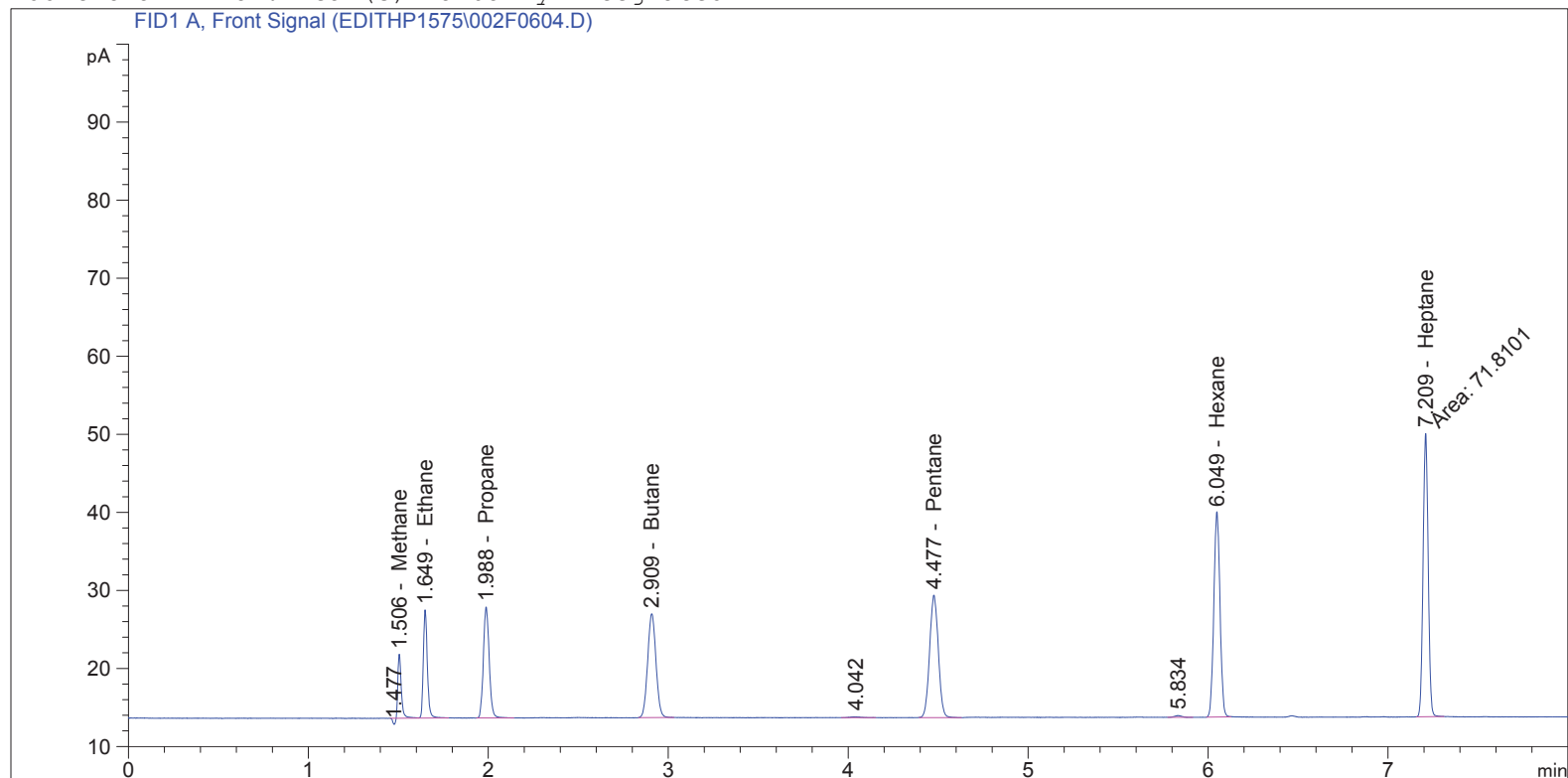
Signal 1: FID1 A, Front Signal

| Name       | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|----------------------|-----------------|
| as Pentane | 4.30614e-1           | 0.3335          |
| as Hexane  | 5.81095e-1           | 0.3913          |
| Methane    | 10.99815             | 40.3814         |
| Ethane     | 21.63459             | 40.7684         |
| Propane    | 32.01132             | 40.5321         |
| Butane     | 42.57405             | 40.5321         |
| Pentane    | 52.74920             | 40.9241         |
| Hexane     | 62.75278             | 42.3535         |
| Heptane    | 71.70566             | 40.5841         |

Totals : 286.8006

\*\*\* End of Report \*\*\*

=====  
Acq. Operator : Nicholas Traversa Seq. Line : 6  
Acq. Instrument : Edith Location : Vial 2  
Injection Date : 11/26/2018 6:29:25 PM Inj : 4  
Inj Volume : 250 µl  
Acq. Method : C:\GC\2018\EDITH\QUARTER 4\EDITHP1575\AQ\_EDITHP503\_HRVOC.M  
Last changed : 8/14/2017 12:18:06 PM by Nicholas Traversa  
Analysis Method : C:\GC\2018\EDITH\METHODS\EDITHP1576F\_C1-C7.M  
Last changed : 12/14/2018 9:51:41 AM by Nicole West  
ECM Server : http://s022vas01/Enthalpy  
ECM Operator : Nicole West  
ECM Path : GC\2018\Edith\Quarter 4\EDITHP1575.SC.SSIzip  
ECM Version : 3 (modified after loading)  
Additional Info : Peak(s) manually integrated



=====  
External Standard Report  
=====

Sorted By : Signal  
Calib. Data Modified : 12/14/2018 9:50:22 AM  
Multiplier : 1.0000  
Dilution : 1.0000  
Use Multiplier & Dilution Factor with ISTDs

Signal 1: FID1 A, Front Signal

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area   | Amount<br>[ppm] | Grp | Name    |
|------------------|------|----------------|------------|-----------------|-----|---------|
| 1.506            | PV   | 11.07759       | 3.67139    | 40.67018        |     | Methane |
| 1.649            | VB   | 21.65865       | 1.88440    | 40.81365        |     | Ethane  |
| 1.988            | BB   | 32.10891       | 1.26617    | 40.65519        |     | Propane |
| 2.909            | BB   | 42.61734       | 9.52036e-1 | 40.57326        |     | Butane  |
| 4.477            | BB   | 52.77180       | 7.75826e-1 | 40.94174        |     | Pentane |
| 6.049            | BB   | 62.79457       | 6.74929e-1 | 42.38188        |     | Hexane  |
| 7.209            | MM   | 71.81006       | 5.65979e-1 | 40.64300        |     | Heptane |

Totals : 286.67889

Uncalibrated Peaks : using compound Propane

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area | Amount<br>[ppm] | Grp | Name |
|------------------|------|----------------|----------|-----------------|-----|------|
| 1.477            | BP N | 7.77669e-1     | 1.30084  | 1.01162         | ?   |      |
| 4.042            | BB   | 4.00612e-1     | 1.30084  | 5.21132e-1      | ?   |      |
| 5.834            | BB   | 6.06667e-1     | 1.30084  | 7.89176e-1      | ?   |      |

Uncalib. totals : 2.32193

Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name       | Start Time<br>[min] | End Time<br>[min] | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|---------------------|-------------------|----------------------|-----------------|
| as Pentane | 3.600               | 5.250             | 4.00612e-1           | 0.3102          |
| as Hexane  | 5.250               | 6.600             | 6.06667e-1           | 0.4085          |

Totals : 7.1877e-1

1 Warnings or Errors :

Warning : Reference compound(s) not found

Final Summed Peaks Report

Signal 1: FID1 A, Front Signal

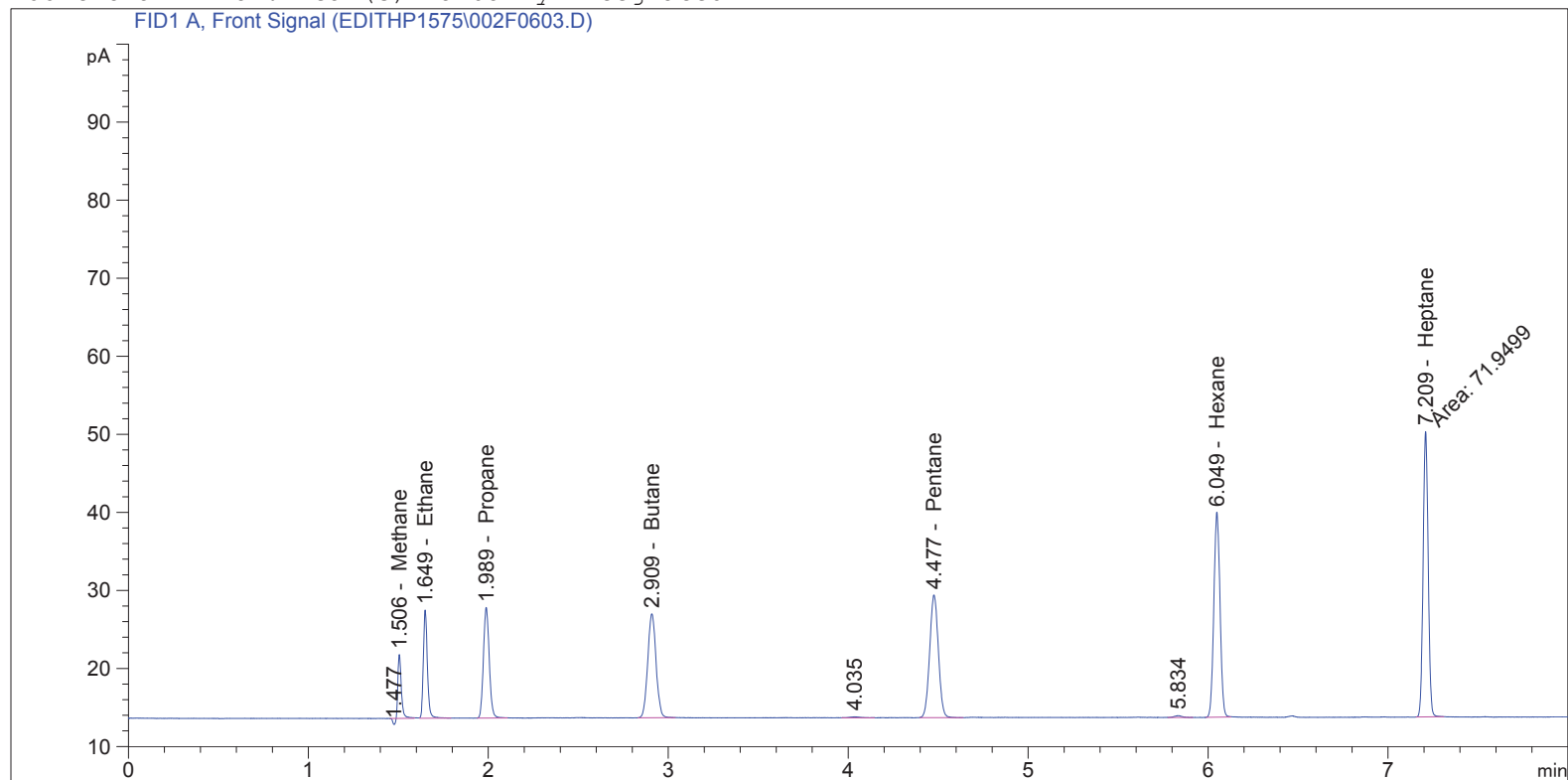
| Name       | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|----------------------|-----------------|
| as Pentane | 4.00612e-1           | 0.3102          |
| as Hexane  | 6.06667e-1           | 0.4085          |
| Methane    | 11.07759             | 40.6702         |
| Ethane     | 21.65865             | 40.8137         |
| Propane    | 32.10891             | 40.6552         |
| Butane     | 42.61734             | 40.5733         |
| Pentane    | 52.77180             | 40.9417         |
| Hexane     | 62.79457             | 42.3819         |
| Heptane    | 71.81006             | 40.6430         |

Totals : 287.3977

\*\*\* End of Report \*\*\*



=====  
Acq. Operator : Nicholas Traversa Seq. Line : 6  
Acq. Instrument : Edith Location : Vial 2  
Injection Date : 11/26/2018 6:12:40 PM Inj : 3  
Inj Volume : 250 µl  
Acq. Method : C:\GC\2018\EDITH\QUARTER 4\EDITHP1575\AQ\_EDITHP503\_HRVOC.M  
Last changed : 8/14/2017 12:18:06 PM by Nicholas Traversa  
Analysis Method : C:\GC\2018\EDITH\METHODS\EDITHP1576F\_C1-C7.M  
Last changed : 12/14/2018 9:51:41 AM by Nicole West  
ECM Server : http://s022vas01/Enthalpy  
ECM Operator : Nicole West  
ECM Path : GC\2018\Edith\Quarter 4\EDITHP1575.SC.SSIzip  
ECM Version : 3 (modified after loading)  
Additional Info : Peak(s) manually integrated



=====  
External Standard Report  
=====

Sorted By : Signal  
Calib. Data Modified : 12/14/2018 9:50:22 AM  
Multiplier : 1.0000  
Dilution : 1.0000  
Use Multiplier & Dilution Factor with ISTDs

Signal 1: FID1 A, Front Signal

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area   | Amount<br>[ppm] | Grp | Name    |
|------------------|------|----------------|------------|-----------------|-----|---------|
| 1.506            | PB   | 10.98377       | 3.67170    | 40.32915        |     | Methane |
| 1.649            | BB   | 21.66619       | 1.88440    | 40.82782        |     | Ethane  |
| 1.989            | BB   | 31.94706       | 1.26619    | 40.45104        |     | Propane |
| 2.909            | BB   | 42.60355       | 9.52037e-1 | 40.56015        |     | Butane  |
| 4.477            | BB   | 52.74406       | 7.75825e-1 | 40.92014        |     | Pentane |
| 6.049            | BB   | 62.79795       | 6.74929e-1 | 42.38417        |     | Hexane  |
| 7.209            | MM   | 71.94994       | 5.65976e-1 | 40.72194        |     | Heptane |

Totals : 286.19440

Uncalibrated Peaks : using compound Propane

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area | Amount<br>[ppm] | Grp | Name |
|------------------|------|----------------|----------|-----------------|-----|------|
| 1.477            | BP N | 7.85343e-1     | 1.30084  | 1.02160         | ?   |      |
| 4.035            | BB   | 4.51579e-1     | 1.30084  | 5.87431e-1      | ?   |      |
| 5.834            | BB   | 6.34677e-1     | 1.30084  | 8.25612e-1      | ?   |      |

Uncalib. totals : 2.43465

Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name       | Start Time<br>[min] | End Time<br>[min] | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|---------------------|-------------------|----------------------|-----------------|
| as Pentane | 3.600               | 5.250             | 4.51579e-1           | 0.3497          |
| as Hexane  | 5.250               | 6.600             | 6.34677e-1           | 0.4274          |

Totals : 7.7710e-1

1 Warnings or Errors :

Warning : Reference compound(s) not found

Final Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name       | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|----------------------|-----------------|
| as Pentane | 4.51579e-1           | 0.3497          |
| as Hexane  | 6.34677e-1           | 0.4274          |
| Methane    | 10.98377             | 40.3291         |
| Ethane     | 21.66619             | 40.8278         |
| Propane    | 31.94706             | 40.4510         |
| Butane     | 42.60355             | 40.5601         |
| Pentane    | 52.74406             | 40.9201         |
| Hexane     | 62.79795             | 42.3842         |
| Heptane    | 71.94994             | 40.7219         |

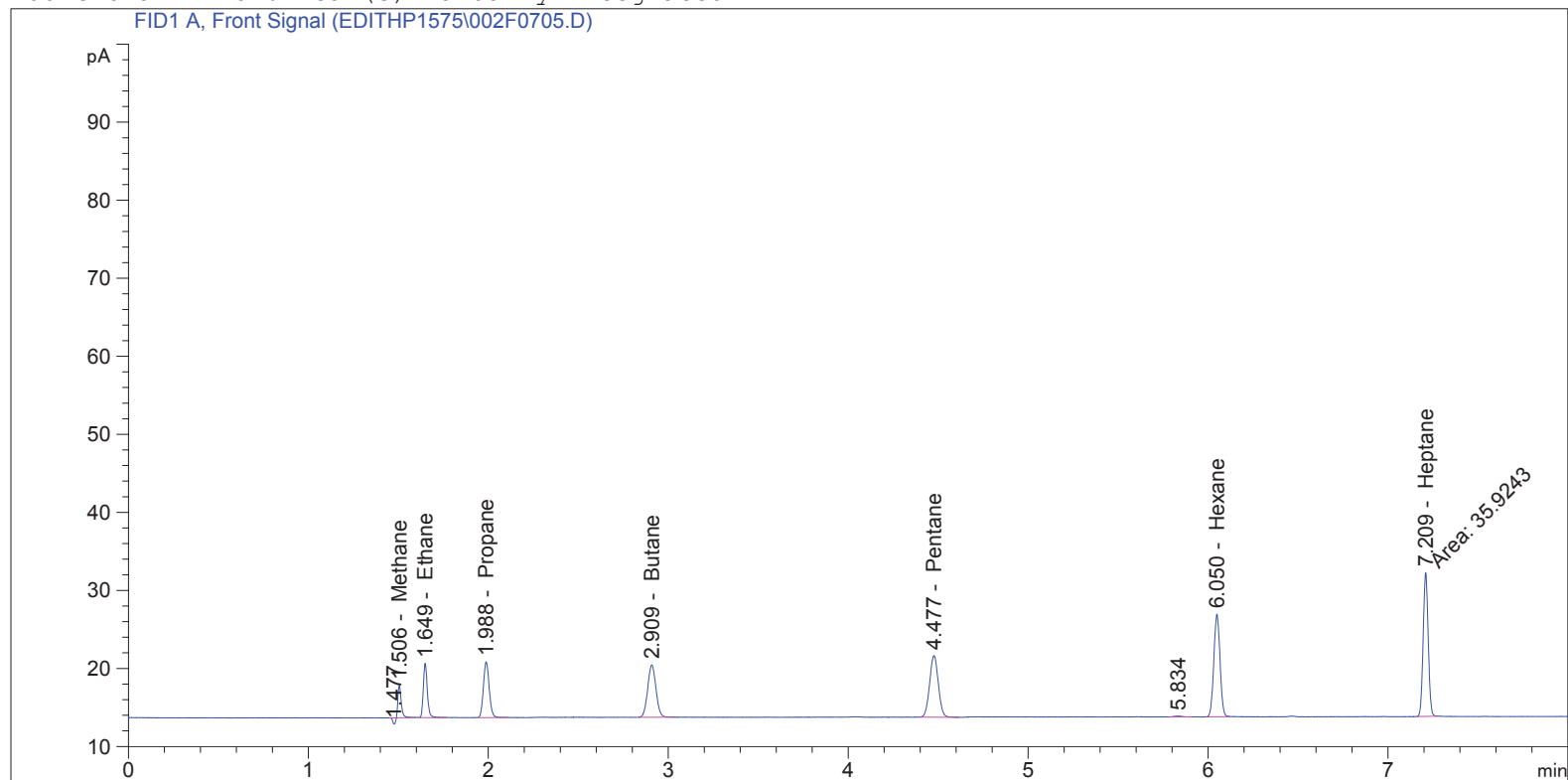
Totals : 286.9715

\*\*\* End of Report \*\*\*

=====

|                 |                         |            |          |
|-----------------|-------------------------|------------|----------|
| Acq. Operator   | : Nicholas Traversa     | Seq. Line  | : 7      |
| Acq. Instrument | : Edith                 | Location   | : Vial 2 |
| Injection Date  | : 11/26/2018 8:10:27 PM | Inj        | : 5      |
|                 |                         | Inj Volume | : 250 µl |

Acq. Method : C:\GC\2018\EDITH\QUARTER 4\EDITHP1575\AQ\_EDITHP503\_HRVOC.M  
Last changed : 8/14/2017 12:18:06 PM by Nicholas Traversa  
Analysis Method : C:\GC\2018\EDITH\METHODS\EDITHP1576F\_C1-C7.M  
Last changed : 12/14/2018 9:51:41 AM by Nicole West  
ECM Server : http://s022vas01/Enthalpy  
ECM Operator : Nicole West  
ECM Path : GC\2018\Edith\Quarter 4\EDITHP1575.SC.SSIzip  
ECM Version : 3 (modified after loading)  
Additional Info : Peak(s) manually integrated



External Standard Report

Sorted By : Signal  
Calib. Data Modified : 12/14/2018 9:50:22 AM  
Multiplier : 1.0000  
Dilution : 1.0000  
Use Multiplier & Dilution Factor with ISTDs

Signal 1: FID1 A, Front Signal

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area   | Amount<br>[ppm] | Grp | Name    |
|------------------|------|----------------|------------|-----------------|-----|---------|
| 1.506            | PB   | 5.51604        | 3.70843    | 20.45587        |     | Methane |
| 1.649            | BB   | 10.89861       | 1.88910    | 20.58860        |     | Ethane  |
| 1.988            | BB   | 16.05990       | 1.27098    | 20.41188        |     | Propane |
| 2.909            | BB   | 21.46897       | 9.53217e-1 | 20.46459        |     | Butane  |
| 4.477            | BB   | 26.60523       | 7.73365e-1 | 20.57555        |     | Pentane |
| 6.050            | BB   | 31.52674       | 6.70775e-1 | 21.14736        |     | Hexane  |
| 7.209            | MM   | 35.92431       | 5.67613e-1 | 20.39109        |     | Heptane |

Totals : 144.03495

Uncalibrated Peaks : using compound Propane

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area | Amount<br>[ppm] | Grp | Name |
|------------------|------|----------------|----------|-----------------|-----|------|
| 1.477            | BP N | 8.32714e-1     | 1.30084  | 1.08323         | ?   |      |
| 5.834            | BB   | 3.11135e-1     | 1.30084  | 4.04736e-1      | ?   |      |

Uncalib. totals : 1.48796

Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name      | Start Time<br>[min] | End Time<br>[min] | Total Area<br>[pA*s] | Amount<br>[ppm] |
|-----------|---------------------|-------------------|----------------------|-----------------|
| as Hexane | 5.250               | 6.600             | 3.11135e-1           | 0.2095          |

Totals : 2.0952e-1

1 Warnings or Errors :

Warning : Reference compound(s) not found

Final Summed Peaks Report

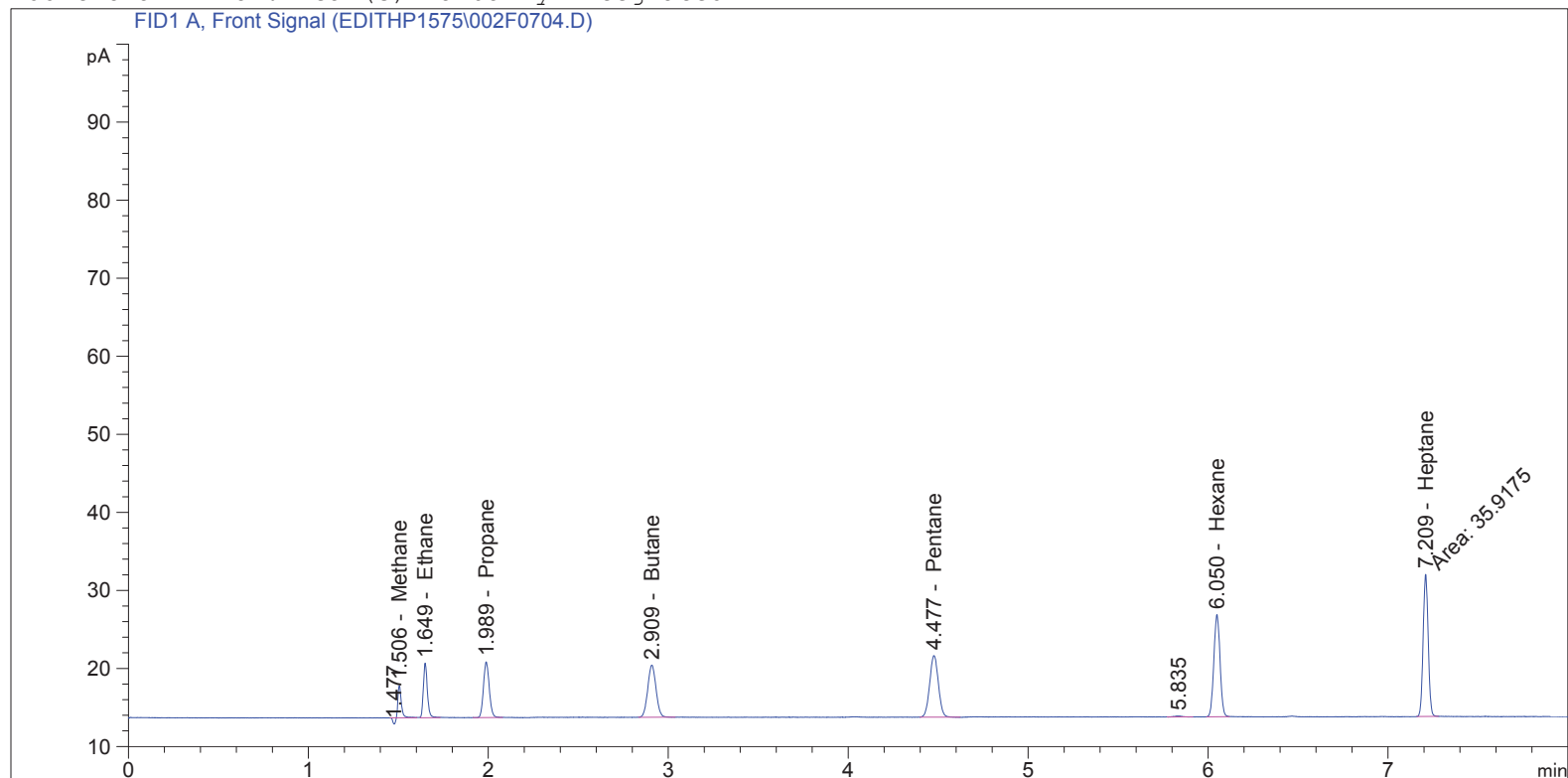
Signal 1: FID1 A, Front Signal

| Name      | Total Area<br>[pA*s] | Amount<br>[ppm] |
|-----------|----------------------|-----------------|
| as Hexane | 3.11135e-1           | 0.2095          |
| Methane   | 5.51604              | 20.4559         |
| Ethane    | 10.89861             | 20.5886         |
| Propane   | 16.05990             | 20.4119         |
| Butane    | 21.46897             | 20.4646         |
| Pentane   | 26.60523             | 20.5755         |
| Hexane    | 31.52674             | 21.1474         |
| Heptane   | 35.92431             | 20.3911         |

Totals : 144.2445

\*\*\* End of Report \*\*\*

=====  
Acq. Operator : Nicholas Traversa Seq. Line : 7  
Acq. Instrument : Edith Location : Vial 2  
Injection Date : 11/26/2018 7:53:40 PM Inj : 4  
Inj Volume : 250 µl  
Acq. Method : C:\GC\2018\EDITH\QUARTER 4\EDITHP1575\AQ\_EDITHP503\_HRVOC.M  
Last changed : 8/14/2017 12:18:06 PM by Nicholas Traversa  
Analysis Method : C:\GC\2018\EDITH\METHODS\EDITHP1576F\_C1-C7.M  
Last changed : 12/14/2018 9:51:41 AM by Nicole West  
ECM Server : http://s022vas01/Enthalpy  
ECM Operator : Nicole West  
ECM Path : GC\2018\Edith\Quarter 4\EDITHP1575.SC.SSIzip  
ECM Version : 3 (modified after loading)  
Additional Info : Peak(s) manually integrated



=====  
External Standard Report  
=====

Sorted By : Signal  
Calib. Data Modified : 12/14/2018 9:50:22 AM  
Multiplier : 1.0000  
Dilution : 1.0000  
Use Multiplier & Dilution Factor with ISTDs

Signal 1: FID1 A, Front Signal

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area   | Amount<br>[ppm] | Grp | Name    |
|------------------|------|----------------|------------|-----------------|-----|---------|
| 1.506            | PB   | 5.57529        | 3.70765    | 20.67124        |     | Methane |
| 1.649            | BB   | 10.89599       | 1.88911    | 20.58368        |     | Ethane  |
| 1.989            | PB   | 15.97103       | 1.27104    | 20.29979        |     | Propane |
| 2.909            | BB   | 21.38335       | 9.53227e-1 | 20.38318        |     | Butane  |
| 4.477            | BB   | 26.52572       | 7.73350e-1 | 20.51367        |     | Pentane |
| 6.050            | BB   | 31.44983       | 6.70755e-1 | 21.09513        |     | Hexane  |
| 7.209            | MM   | 35.91750       | 5.67613e-1 | 20.38725        |     | Heptane |

Totals : 143.93393

Uncalibrated Peaks : using compound Propane

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area | Amount<br>[ppm] | Grp | Name |
|------------------|------|----------------|----------|-----------------|-----|------|
| 1.477            | BP N | 8.06123e-1     | 1.30084  | 1.04864         | ?   |      |
| 5.835            | BB   | 3.12239e-1     | 1.30084  | 4.06173e-1      | ?   |      |

Uncalib. totals : 1.45481

Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name      | Start Time<br>[min] | End Time<br>[min] | Total Area<br>[pA*s] | Amount<br>[ppm] |
|-----------|---------------------|-------------------|----------------------|-----------------|
| as Hexane | 5.250               | 6.600             | 3.12239e-1           | 0.2103          |

Totals : 2.1026e-1

1 Warnings or Errors :

Warning : Reference compound(s) not found

Final Summed Peaks Report

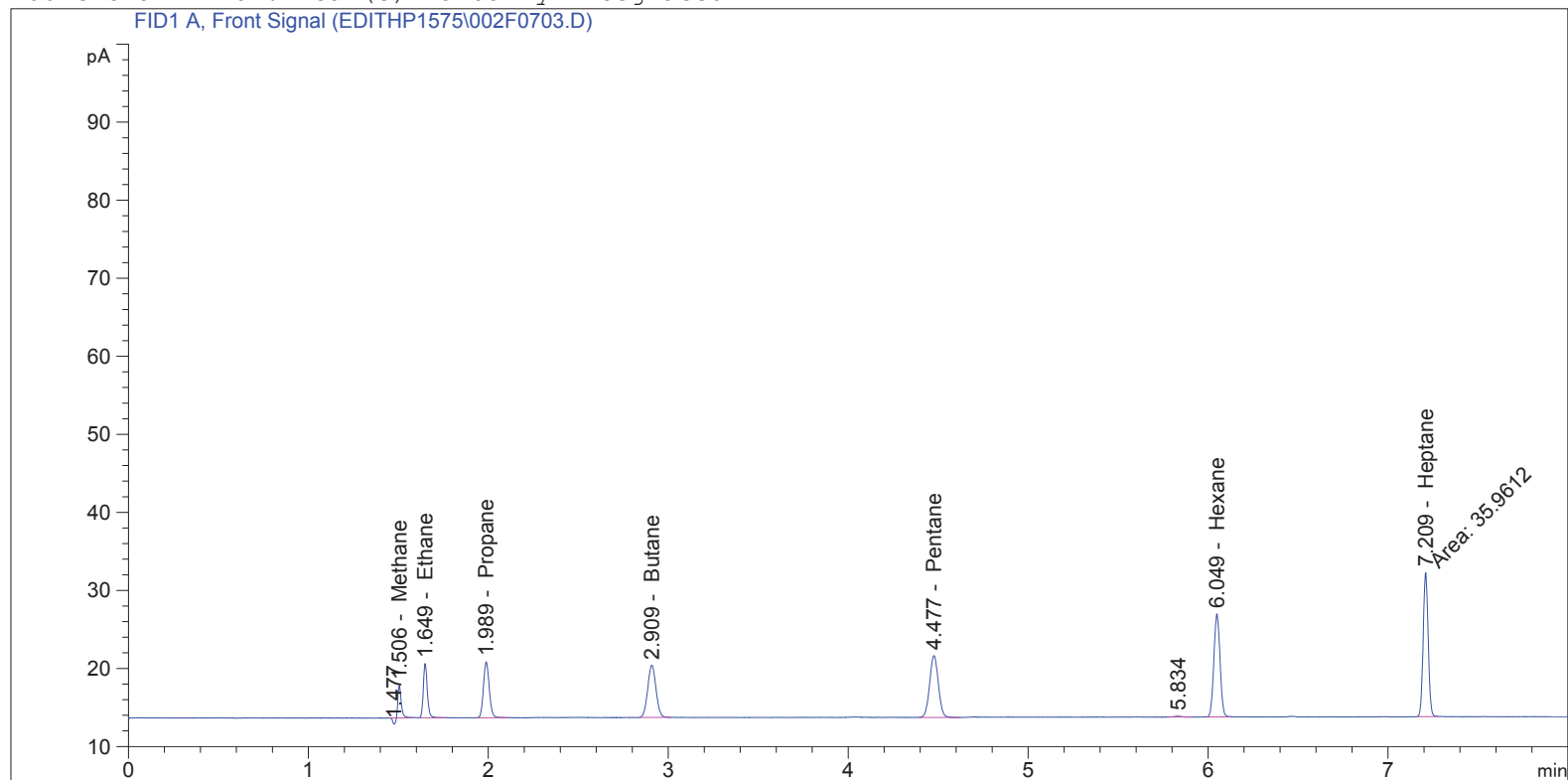
Signal 1: FID1 A, Front Signal

| Name      | Total Area<br>[pA*s] | Amount<br>[ppm] |
|-----------|----------------------|-----------------|
| as Hexane | 3.12239e-1           | 0.2103          |
| Methane   | 5.57529              | 20.6712         |
| Ethane    | 10.89599             | 20.5837         |
| Propane   | 15.97103             | 20.2998         |
| Butane    | 21.38335             | 20.3832         |
| Pentane   | 26.52572             | 20.5137         |
| Hexane    | 31.44983             | 21.0951         |
| Heptane   | 35.91750             | 20.3872         |

Totals : 144.1442

\*\*\* End of Report \*\*\*

=====  
Acq. Operator : Nicholas Traversa Seq. Line : 7  
Acq. Instrument : Edith Location : Vial 2  
Injection Date : 11/26/2018 7:36:52 PM Inj : 3  
Inj Volume : 250 µl  
Acq. Method : C:\GC\2018\EDITH\QUARTER 4\EDITHP1575\AQ\_EDITHP503\_HRVOC.M  
Last changed : 8/14/2017 12:18:06 PM by Nicholas Traversa  
Analysis Method : C:\GC\2018\EDITH\METHODS\EDITHP1576F\_C1-C7.M  
Last changed : 12/14/2018 9:51:41 AM by Nicole West  
ECM Server : http://s022vas01/Enthalpy  
ECM Operator : Nicole West  
ECM Path : GC\2018\Edith\Quarter 4\EDITHP1575.SC.SSIzip  
ECM Version : 3 (modified after loading)  
Additional Info : Peak(s) manually integrated



=====  
External Standard Report  
=====

Sorted By : Signal  
Calib. Data Modified : 12/14/2018 9:50:22 AM  
Multiplier : 1.0000  
Dilution : 1.0000  
Use Multiplier & Dilution Factor with ISTDs

Signal 1: FID1 A, Front Signal

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area   | Amount<br>[ppm] | Grp | Name    |
|------------------|------|----------------|------------|-----------------|-----|---------|
| 1.506            | PB   | 5.49202        | 3.70876    | 20.36858        |     | Methane |
| 1.649            | BB   | 10.87127       | 1.88913    | 20.53723        |     | Ethane  |
| 1.989            | BB   | 16.12137       | 1.27095    | 20.48942        |     | Propane |
| 2.909            | BB   | 21.42468       | 9.53222e-1 | 20.42249        |     | Butane  |
| 4.477            | BB   | 26.64799       | 7.73373e-1 | 20.60883        |     | Pentane |
| 6.049            | BB   | 31.54122       | 6.70779e-1 | 21.15719        |     | Hexane  |
| 7.209            | MM   | 35.96122       | 5.67609e-1 | 20.41192        |     | Heptane |

Totals : 143.99567

Uncalibrated Peaks : using compound Propane

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area | Amount<br>[ppm] | Grp | Name |
|------------------|------|----------------|----------|-----------------|-----|------|
| 1.477            | BP N | 8.19267e-1     | 1.30084  | 1.06573         | ?   |      |
| 5.834            | BB   | 3.06913e-1     | 1.30084  | 3.99244e-1      | ?   |      |

Uncalib. totals : 1.46498

Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name      | Start Time<br>[min] | End Time<br>[min] | Total Area<br>[pA*s] | Amount<br>[ppm] |
|-----------|---------------------|-------------------|----------------------|-----------------|
| as Hexane | 5.250               | 6.600             | 3.06913e-1           | 0.2067          |

Totals : 2.0668e-1

1 Warnings or Errors :

Warning : Reference compound(s) not found

Final Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name      | Total Area<br>[pA*s] | Amount<br>[ppm] |
|-----------|----------------------|-----------------|
| as Hexane | 3.06913e-1           | 0.2067          |
| Methane   | 5.49202              | 20.3686         |
| Ethane    | 10.87127             | 20.5372         |
| Propane   | 16.12137             | 20.4894         |
| Butane    | 21.42468             | 20.4225         |
| Pentane   | 26.64799             | 20.6088         |
| Hexane    | 31.54122             | 21.1572         |
| Heptane   | 35.96122             | 20.4119         |

Totals : 144.2023

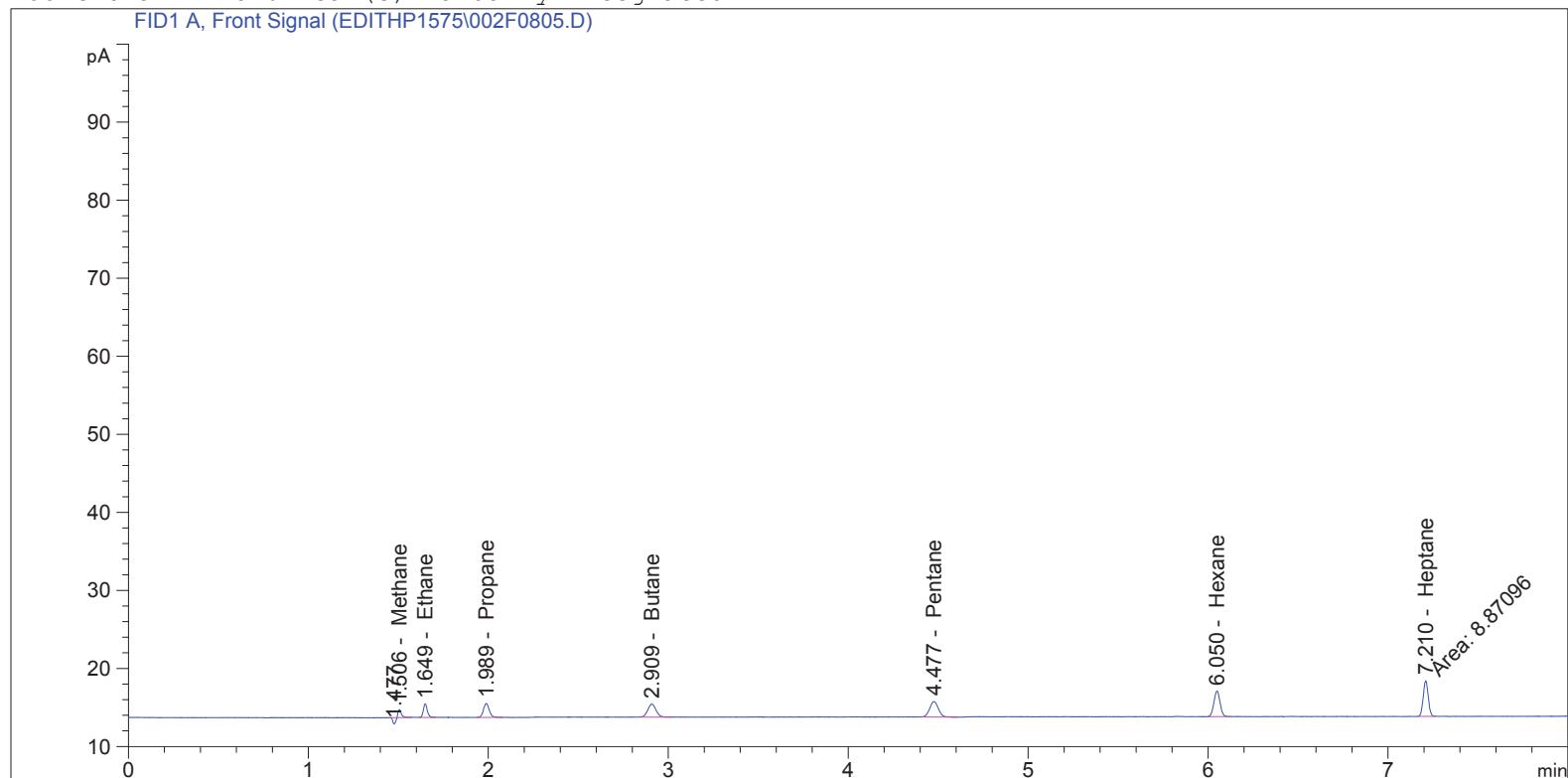
\*\*\* End of Report \*\*\*



=====

|                 |                         |            |          |
|-----------------|-------------------------|------------|----------|
| Acq. Operator   | : Nicholas Traversa     | Seq. Line  | : 8      |
| Acq. Instrument | : Edith                 | Location   | : Vial 2 |
| Injection Date  | : 11/26/2018 9:34:43 PM | Inj        | : 5      |
|                 |                         | Inj Volume | : 250 µl |

Acq. Method : C:\GC\2018\EDITH\QUARTER 4\EDITHP1575\AQ\_EDITHP503\_HRVOC.M  
Last changed : 8/14/2017 12:18:06 PM by Nicholas Traversa  
Analysis Method : C:\GC\2018\EDITH\METHODS\EDITHP1576F\_C1-C7.M  
Last changed : 12/14/2018 9:51:41 AM by Nicole West  
ECM Server : http://s022vas01/Enthalpy  
ECM Operator : Nicole West  
ECM Path : GC\2018\Edith\Quarter 4\EDITHP1575.SC.SSIzip  
ECM Version : 3 (modified after loading)  
Additional Info : Peak(s) manually integrated



External Standard Report

Sorted By : Signal  
Calib. Data Modified : 12/14/2018 9:50:22 AM  
Multiplier : 1.0000  
Dilution : 1.0000  
Use Multiplier & Dilution Factor with ISTDs

Signal 1: FID1 A, Front Signal

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area   | Amount<br>[ppm] | Grp | Name    |
|------------------|------|----------------|------------|-----------------|-----|---------|
| 1.506            | PB   | 1.34769        | 3.93665    | 5.30539         |     | Methane |
| 1.649            | BB   | 2.68938        | 1.91798    | 5.15819         |     | Ethane  |
| 1.989            | BB   | 3.98060        | 1.30024    | 5.17575         |     | Propane |
| 2.909            | BB   | 5.32137        | 9.60439e-1 | 5.11086         |     | Butane  |
| 4.477            | BB   | 6.75434        | 7.58777e-1 | 5.12504         |     | Pentane |
| 6.050            | BB   | 7.80680        | 6.45815e-1 | 5.04175         |     | Hexane  |
| 7.210            | MM   | 8.87096        | 5.77581e-1 | 5.12370         |     | Heptane |

Totals : 36.04068

Uncalibrated Peaks : using compound Propane

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area | Amount<br>[ppm] | Grp | Name |
|------------------|------|----------------|----------|-----------------|-----|------|
| 1.477            | BP N | 8.93210e-1     | 1.30084  | 1.16192         | ?   |      |

Uncalib. totals : 1.16192

Summed Peaks Report

Signal 1: FID1 A, Front Signal

1 Warnings or Errors :

Warning : Reference compound(s) not found

Final Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name    | Total Area<br>[pA*s] | Amount<br>[ppm] |
|---------|----------------------|-----------------|
| Methane | 1.34769              | 5.3054          |
| Ethane  | 2.68938              | 5.1582          |
| Propane | 3.98060              | 5.1757          |
| Butane  | 5.32137              | 5.1109          |
| Pentane | 6.75434              | 5.1250          |
| Hexane  | 7.80680              | 5.0417          |
| Heptane | 8.87096              | 5.1237          |

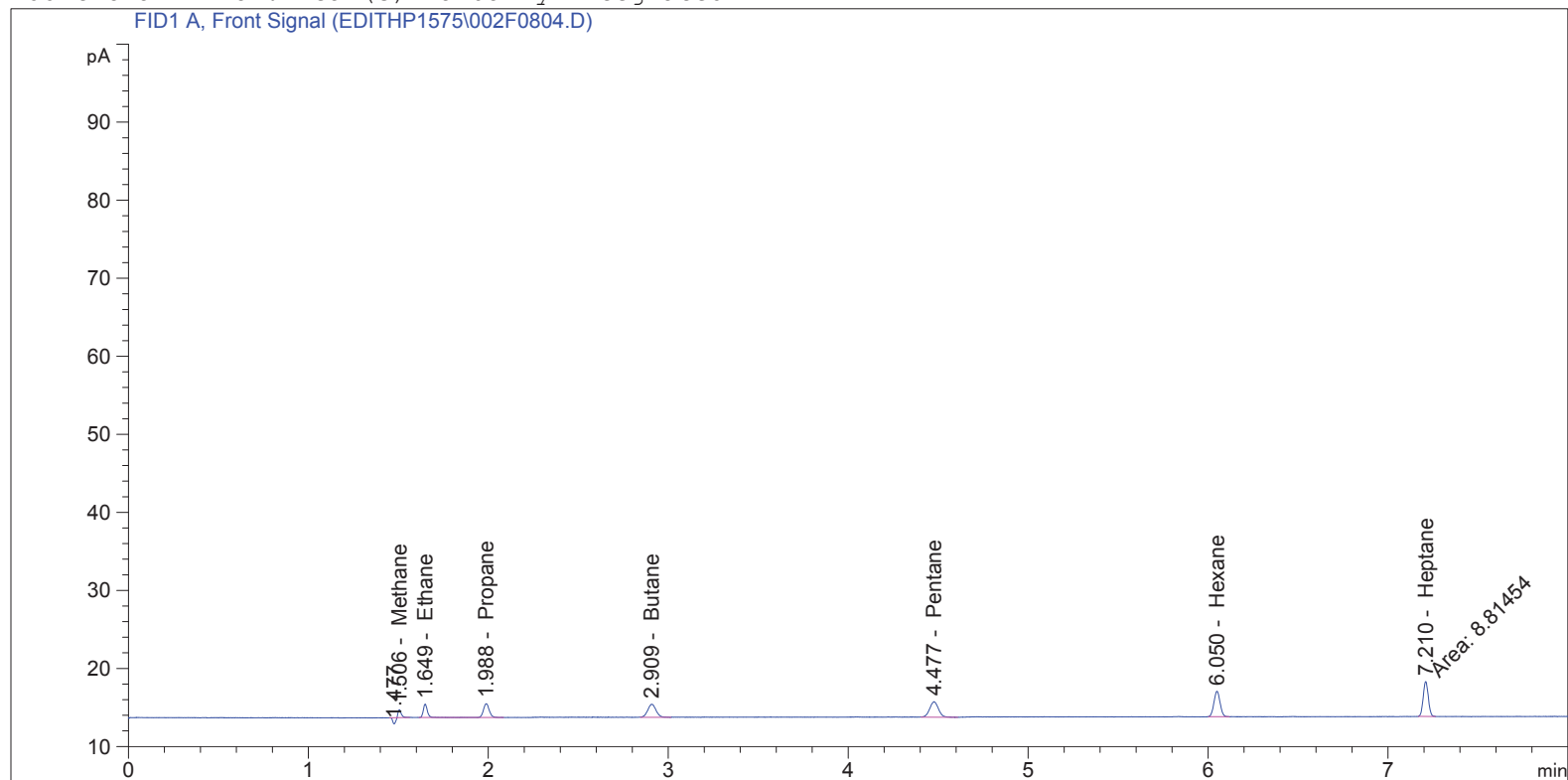
Totals : 36.0407

\*\*\* End of Report \*\*\*

=====

|                 |                         |            |          |
|-----------------|-------------------------|------------|----------|
| Acq. Operator   | : Nicholas Traversa     | Seq. Line  | : 8      |
| Acq. Instrument | : Edith                 | Location   | : Vial 2 |
| Injection Date  | : 11/26/2018 9:17:57 PM | Inj        | : 4      |
|                 |                         | Inj Volume | : 250 µl |

Acq. Method : C:\GC\2018\EDITH\QUARTER 4\EDITHP1575\AQ\_EDITHP503\_HRVOC.M  
Last changed : 8/14/2017 12:18:06 PM by Nicholas Traversa  
Analysis Method : C:\GC\2018\EDITH\METHODS\EDITHP1576F\_C1-C7.M  
Last changed : 12/14/2018 9:51:41 AM by Nicole West  
ECM Server : http://s022vas01/Enthalpy  
ECM Operator : Nicole West  
ECM Path : GC\2018\Edith\Quarter 4\EDITHP1575.SC.SSIzip  
ECM Version : 3 (modified after loading)  
Additional Info : Peak(s) manually integrated



External Standard Report

Sorted By : Signal  
Calib. Data Modified : 12/14/2018 9:50:22 AM  
Multiplier : 1.0000  
Dilution : 1.0000  
Use Multiplier & Dilution Factor with ISTDs

Signal 1: FID1 A, Front Signal

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area   | Amount<br>[ppm] | Grp | Name    |
|------------------|------|----------------|------------|-----------------|-----|---------|
| 1.506            | PB   | 1.27715        | 3.94986    | 5.04457         |     | Methane |
| 1.649            | BP   | 2.63685        | 1.91843    | 5.05861         |     | Ethane  |
| 1.988            | VB   | 3.92124        | 1.30083    | 5.10087         |     | Propane |
| 2.909            | BB   | 5.32560        | 9.60431e-1 | 5.11487         |     | Butane  |
| 4.477            | BB   | 6.70052        | 7.58684e-1 | 5.08358         |     | Pentane |
| 6.050            | BB   | 7.77185        | 6.45815e-1 | 5.01918         |     | Hexane  |
| 7.210            | MM   | 8.81454        | 5.77644e-1 | 5.09166         |     | Heptane |

Totals : 35.51334

Uncalibrated Peaks : using compound Propane

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area | Amount<br>[ppm] | Grp | Name |
|------------------|------|----------------|----------|-----------------|-----|------|
| 1.477            | BP N | 8.91521e-1     | 1.30084  | 1.15972         | ?   |      |

Uncalib. totals : 1.15972

=====  
Summed Peaks Report  
=====

Signal 1: FID1 A, Front Signal

1 Warnings or Errors :

Warning : Reference compound(s) not found

=====  
Final Summed Peaks Report  
=====

Signal 1: FID1 A, Front Signal

| Name    | Total Area<br>[pA*s] | Amount<br>[ppm] |
|---------|----------------------|-----------------|
| Methane | 1.27715              | 5.0446          |
| Ethane  | 2.63685              | 5.0586          |
| Propane | 3.92124              | 5.1009          |
| Butane  | 5.32560              | 5.1149          |
| Pentane | 6.70052              | 5.0836          |
| Hexane  | 7.77185              | 5.0192          |
| Heptane | 8.81454              | 5.0917          |

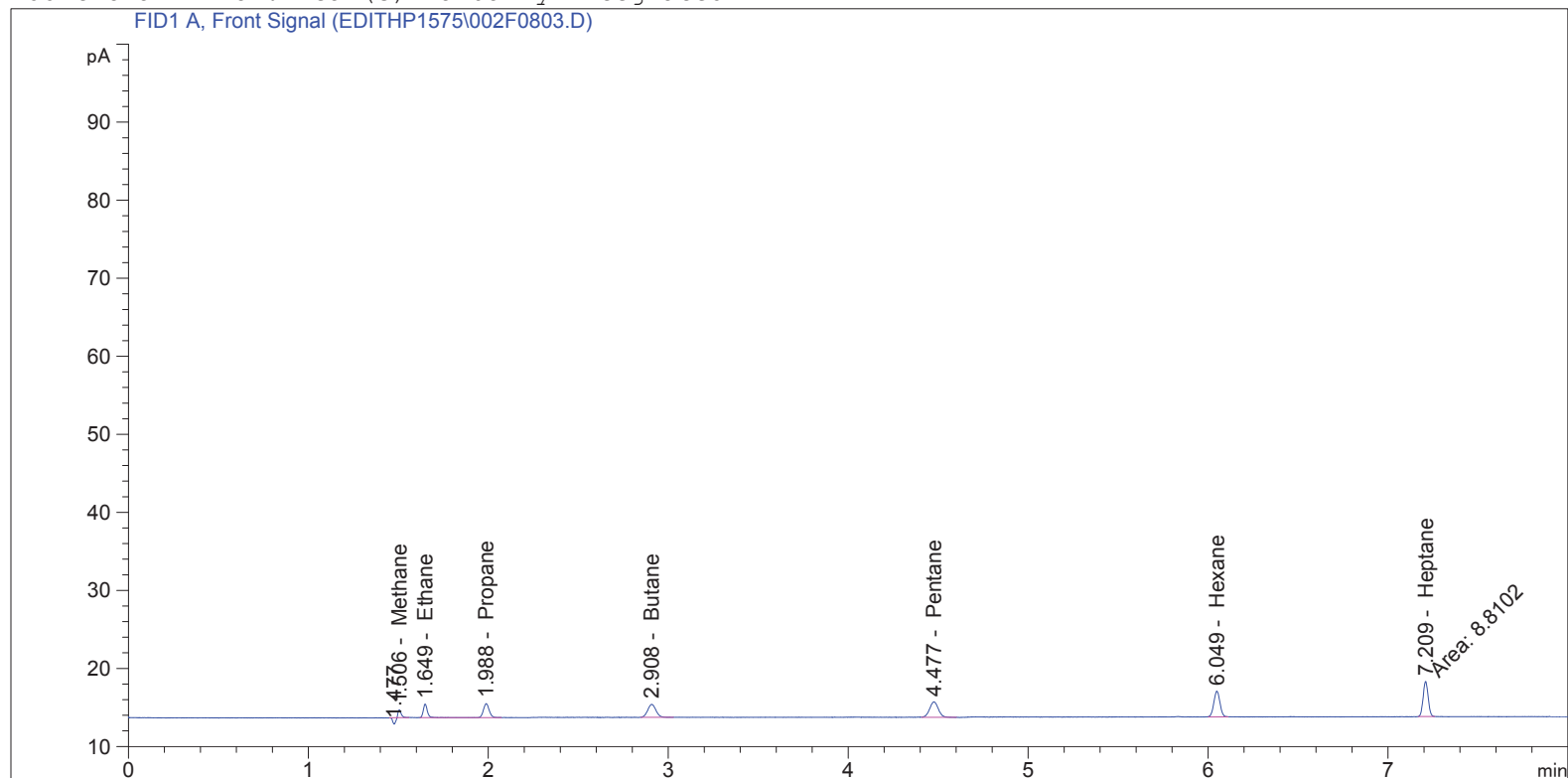
Totals : 35.5133

\*\*\* End of Report \*\*\*

=====

|                 |                         |            |          |
|-----------------|-------------------------|------------|----------|
| Acq. Operator   | : Nicholas Traversa     | Seq. Line  | : 8      |
| Acq. Instrument | : Edith                 | Location   | : Vial 2 |
| Injection Date  | : 11/26/2018 9:01:03 PM | Inj        | : 3      |
|                 |                         | Inj Volume | : 250 µl |

Acq. Method : C:\GC\2018\EDITH\QUARTER 4\EDITHP1575\AQ\_EDITHP503\_HRVOC.M  
Last changed : 8/14/2017 12:18:06 PM by Nicholas Traversa  
Analysis Method : C:\GC\2018\EDITH\METHODS\EDITHP1576F\_C1-C7.M  
Last changed : 12/14/2018 9:51:41 AM by Nicole West  
ECM Server : http://s022vas01/Enthalpy  
ECM Operator : Nicole West  
ECM Path : GC\2018\Edith\Quarter 4\EDITHP1575.SC.SSIzip  
ECM Version : 3 (modified after loading)  
Additional Info : Peak(s) manually integrated



=====

External Standard Report

=====

Sorted By : Signal  
Calib. Data Modified : 12/14/2018 9:50:22 AM  
Multiplier : 1.0000  
Dilution : 1.0000  
Use Multiplier & Dilution Factor with ISTDs

Signal 1: FID1 A, Front Signal

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area   | Amount<br>[ppm] | Grp | Name    |
|------------------|------|----------------|------------|-----------------|-----|---------|
| 1.506            | PB   | 1.24997        | 3.94986    | 4.93720         |     | Methane |
| 1.649            | BP   | 2.63154        | 1.91843    | 5.04842         |     | Ethane  |
| 1.988            | VB   | 3.87200        | 1.30084    | 5.03684         |     | Propane |
| 2.908            | BB   | 5.29373        | 9.60460e-1 | 5.08441         |     | Butane  |
| 4.477            | BB   | 6.67106        | 7.58684e-1 | 5.06123         |     | Pentane |
| 6.049            | BB   | 7.79994        | 6.45815e-1 | 5.03732         |     | Hexane  |
| 7.209            | MM   | 8.81020        | 5.77644e-1 | 5.08916         |     | Heptane |

Totals : 35.29458

Uncalibrated Peaks : using compound Propane

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area | Amount<br>[ppm] | Grp | Name |
|------------------|------|----------------|----------|-----------------|-----|------|
| 1.477            | BP N | 9.15488e-1     | 1.30084  | 1.19090         | ?   |      |

Uncalib. totals : 1.19090

Summed Peaks Report

Signal 1: FID1 A, Front Signal

1 Warnings or Errors :

Warning : Reference compound(s) not found

Final Summed Peaks Report

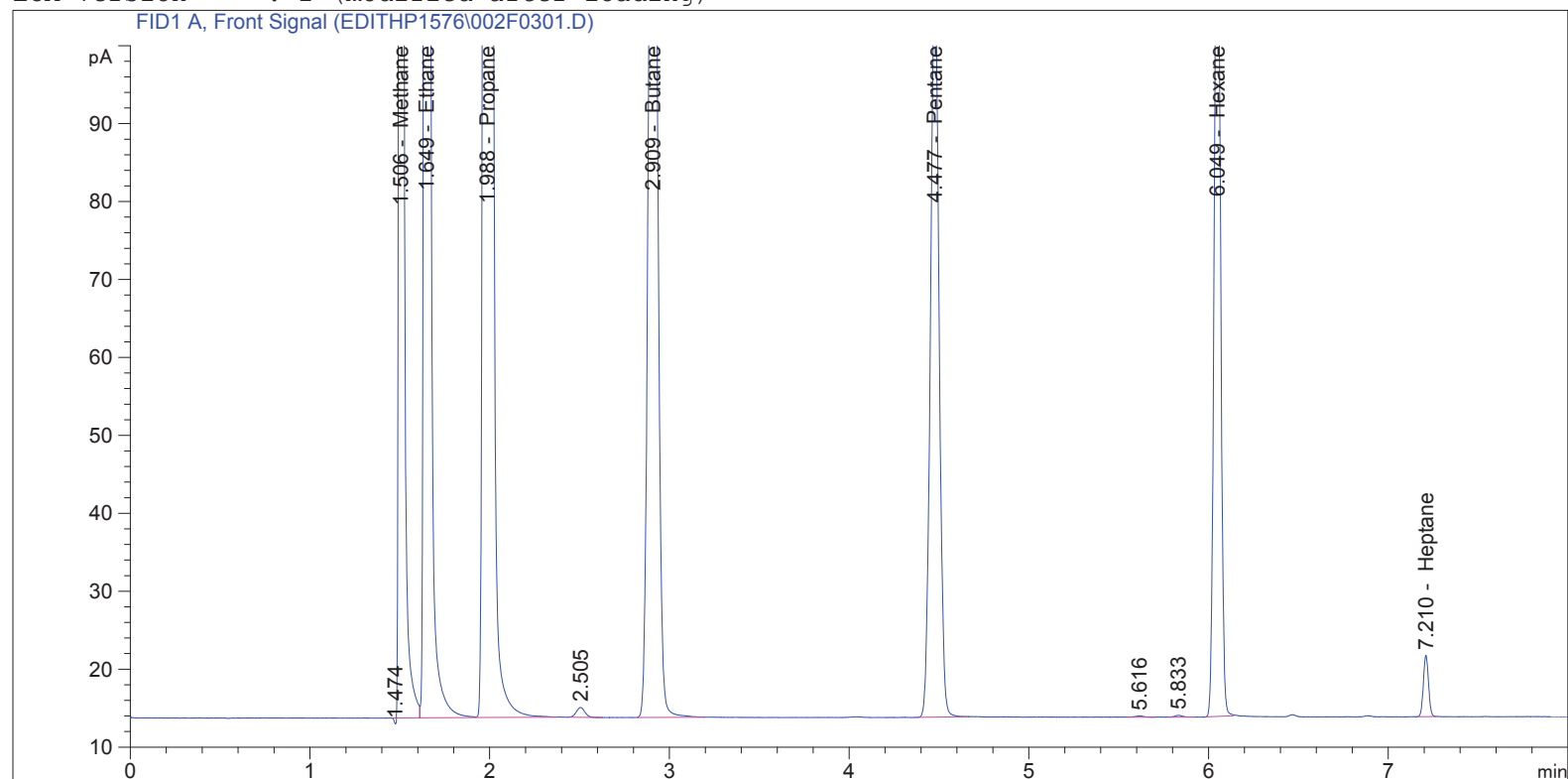
Signal 1: FID1 A, Front Signal

| Name    | Total Area<br>[pA*s] | Amount<br>[ppm] |
|---------|----------------------|-----------------|
| Methane | 1.24997              | 4.9372          |
| Ethane  | 2.63154              | 5.0484          |
| Propane | 3.87200              | 5.0368          |
| Butane  | 5.29373              | 5.0844          |
| Pentane | 6.67106              | 5.0612          |
| Hexane  | 7.79994              | 5.0373          |
| Heptane | 8.81020              | 5.0892          |

Totals : 35.2946

\*\*\* End of Report \*\*\*

=====  
Acq. Operator : Nicholas Traversa Seq. Line : 3  
Acq. Instrument : Edith Location : Vial 2  
Injection Date : 11/27/2018 9:15:39 AM Inj : 1  
Inj Volume : 250 µl  
Acq. Method : C:\GC\2018\EDITH\QUARTER 4\EDITHP1576\AQ\_EDITHP503\_HRVOC.M  
Last changed : 8/14/2017 12:18:06 PM by Nicholas Traversa  
Analysis Method : C:\GC\2018\EDITH\METHODS\EDITHP1576F\_C1-C7.M  
Last changed : 12/14/2018 9:51:41 AM by Nicole West  
ECM Server : http://s022vas01/Enthalpy  
ECM Operator : Nicole West  
ECM Path : GC\2018\Edith\Quarter 4\EDITHP1576.SC.SSIzip  
ECM Version : 2 (modified after loading)  
=====



=====  
External Standard Report  
=====

Sorted By : Signal  
Calib. Data Modified : 12/14/2018 9:50:22 AM  
Multiplier : 1.0000  
Dilution : 1.0000  
Use Multiplier & Dilution Factor with ISTDs

Signal 1: FID1 A, Front Signal

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area   | Amount<br>[ppm] | Grp | Name    |
|------------------|------|----------------|------------|-----------------|-----|---------|
| 1.506            | PV   | 683.82556      | 3.63525    | 2485.87356      |     | Methane |
| 1.649            | VV   | 1315.96326     | 1.87972    | 2473.64508      |     | Ethane  |
| 1.988            | VB   | 1975.39160     | 1.26142    | 2491.80081      |     | Propane |
| 2.909            | BB   | 520.42926      | 9.50936e-1 | 494.89471       |     | Butane  |
| 4.477            | BB   | 312.89081      | 7.77906e-1 | 243.39972       |     | Pentane |
| 6.049            | BB   | 274.24289      | 6.78158e-1 | 185.98005       |     | Hexane  |
| 7.210            | BB   | 15.67916       | 5.71833e-1 | 8.96586         |     | Heptane |

Totals : 8384.55980  
490

Uncalibrated Peaks : using compound Propane

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area | Amount<br>[ppm] | Grp | Name |
|------------------|------|----------------|----------|-----------------|-----|------|
| 1.474            | BP N | 5.35620e-1     | 1.30084  | 6.96755e-1      | ?   |      |
| 2.505            | BB   | 4.10949        | 1.29902  | 5.33832         | ?   |      |
| 5.616            | BB   | 5.32803e-1     | 1.30084  | 6.93091e-1      | ?   |      |
| 5.833            | BB   | 6.62697e-1     | 1.30084  | 8.62062e-1      | ?   |      |

Uncalib. totals : 7.59023

Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name      | Start Time<br>[min] | End Time<br>[min] | Total Area<br>[pA*s] | Amount<br>[ppm] |
|-----------|---------------------|-------------------|----------------------|-----------------|
| as Butane | 2.500               | 3.600             | 4.10949              | 3.9160          |
| as Hexane | 5.250               | 6.600             | 1.19550              | 0.8050          |

Totals : 4.7211

1 Warnings or Errors :

Warning : Reference compound(s) not found

Final Summed Peaks Report

Signal 1: FID1 A, Front Signal

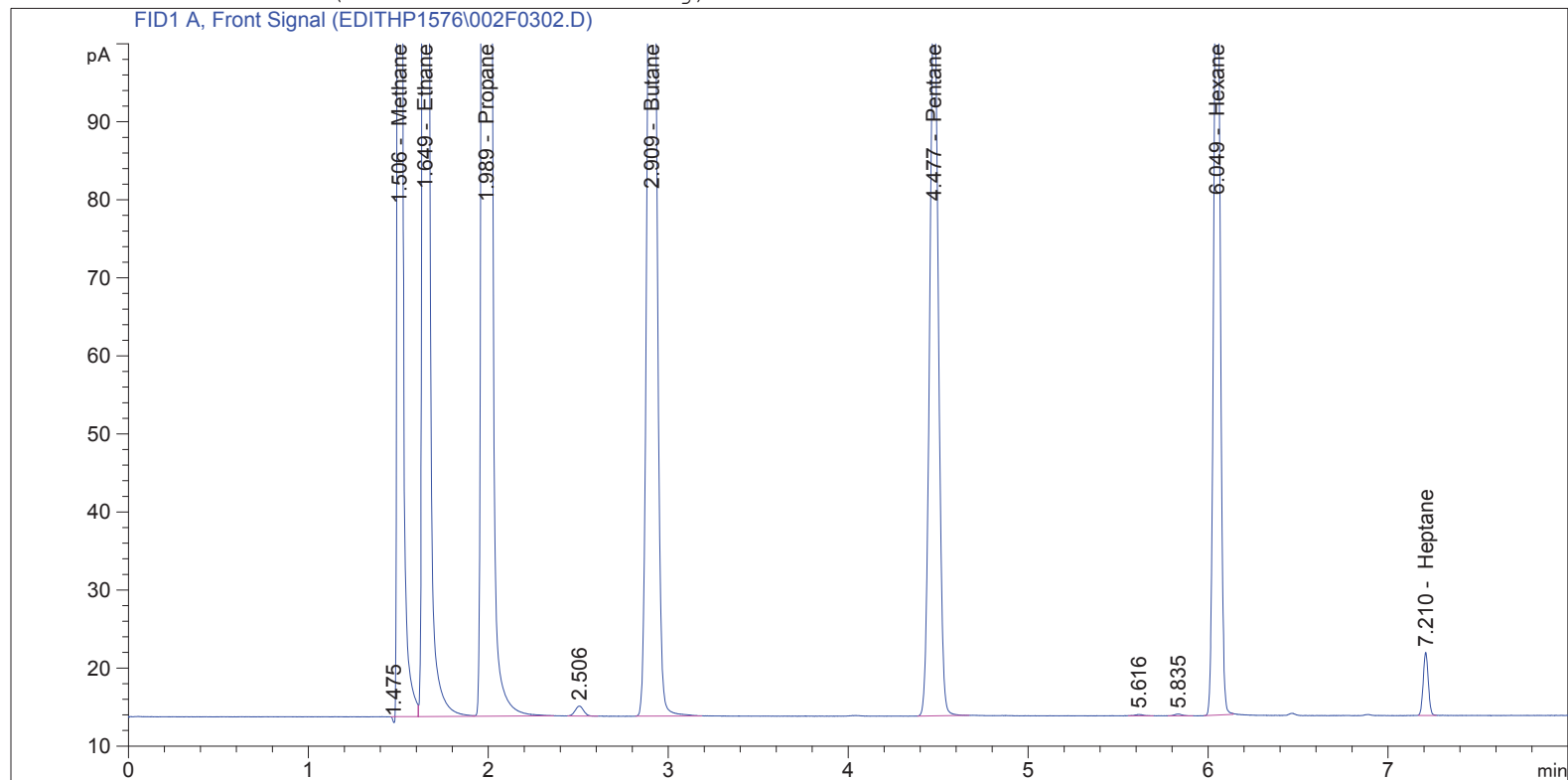
| Name      | Total Area<br>[pA*s] | Amount<br>[ppm] |
|-----------|----------------------|-----------------|
| as Butane | 4.10949              | 3.9160          |
| as Hexane | 1.19550              | 0.8050          |
| Methane   | 683.82556            | 2.486e3         |
| Ethane    | 1315.96326           | 2.474e3         |
| Propane   | 1975.39160           | 2.492e3         |
| Butane    | 520.42926            | 494.8947        |
| Pentane   | 312.89081            | 243.3997        |
| Hexane    | 274.24289            | 185.9800        |
| Heptane   | 15.67916             | 8.9659          |

Totals : 8389.2809

\*\*\* End of Report \*\*\*



=====  
Acq. Operator : Nicholas Traversa Seq. Line : 3  
Acq. Instrument : Edith Location : Vial 2  
Injection Date : 11/27/2018 9:32:21 AM Inj : 2  
Inj Volume : 250 µl  
Acq. Method : C:\GC\2018\EDITH\QUARTER 4\EDITHP1576\AQ\_EDITHP503\_HRVOC.M  
Last changed : 8/14/2017 12:18:06 PM by Nicholas Traversa  
Analysis Method : C:\GC\2018\EDITH\METHODS\EDITHP1576F\_C1-C7.M  
Last changed : 12/14/2018 9:51:41 AM by Nicole West  
ECM Server : http://s022vas01/Enthalpy  
ECM Operator : Nicole West  
ECM Path : GC\2018\Edith\Quarter 4\EDITHP1576.SC.SSIzip  
ECM Version : 2 (modified after loading)  
=====



=====  
External Standard Report  
=====

Sorted By : Signal  
Calib. Data Modified : 12/14/2018 9:50:22 AM  
Multiplier : 1.0000  
Dilution : 1.0000  
Use Multiplier & Dilution Factor with ISTDs

Signal 1: FID1 A, Front Signal

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area   | Amount<br>[ppm] | Grp | Name    |
|------------------|------|----------------|------------|-----------------|-----|---------|
| 1.506            | PV   | 686.03040      | 3.63524    | 2493.88736      |     | Methane |
| 1.649            | VV   | 1319.69446     | 1.87972    | 2480.65841      |     | Ethane  |
| 1.989            | VB   | 1980.55090     | 1.26142    | 2498.30846      |     | Propane |
| 2.909            | BB   | 521.80157      | 9.50935e-1 | 496.19956       |     | Butane  |
| 4.477            | BB   | 314.09924      | 7.77908e-1 | 244.34028       |     | Pentane |
| 6.049            | BB   | 275.69302      | 6.78163e-1 | 186.96486       |     | Hexane  |
| 7.210            | BB   | 15.86714       | 5.71744e-1 | 9.07195         |     | Heptane |

Totals : 8409.43080  
492

Uncalibrated Peaks : using compound Propane

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area | Amount<br>[ppm] | Grp | Name |
|------------------|------|----------------|----------|-----------------|-----|------|
| 1.475            | BP N | 5.47269e-1     | 1.30084  | 7.11909e-1      | ?   |      |
| 2.506            | BB   | 4.12589        | 1.29887  | 5.35900         | ?   |      |
| 5.616            | BB   | 5.04847e-1     | 1.30084  | 6.56724e-1      | ?   |      |
| 5.835            | BB   | 6.49772e-1     | 1.30084  | 8.45248e-1      | ?   |      |

Uncalib. totals : 7.57288

Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name      | Start Time<br>[min] | End Time<br>[min] | Total Area<br>[pA*s] | Amount<br>[ppm] |
|-----------|---------------------|-------------------|----------------------|-----------------|
| as Butane | 2.500               | 3.600             | 4.12589              | 3.9316          |
| as Hexane | 5.250               | 6.600             | 1.15462              | 0.7775          |

Totals : 4.7092

1 Warnings or Errors :

Warning : Reference compound(s) not found

Final Summed Peaks Report

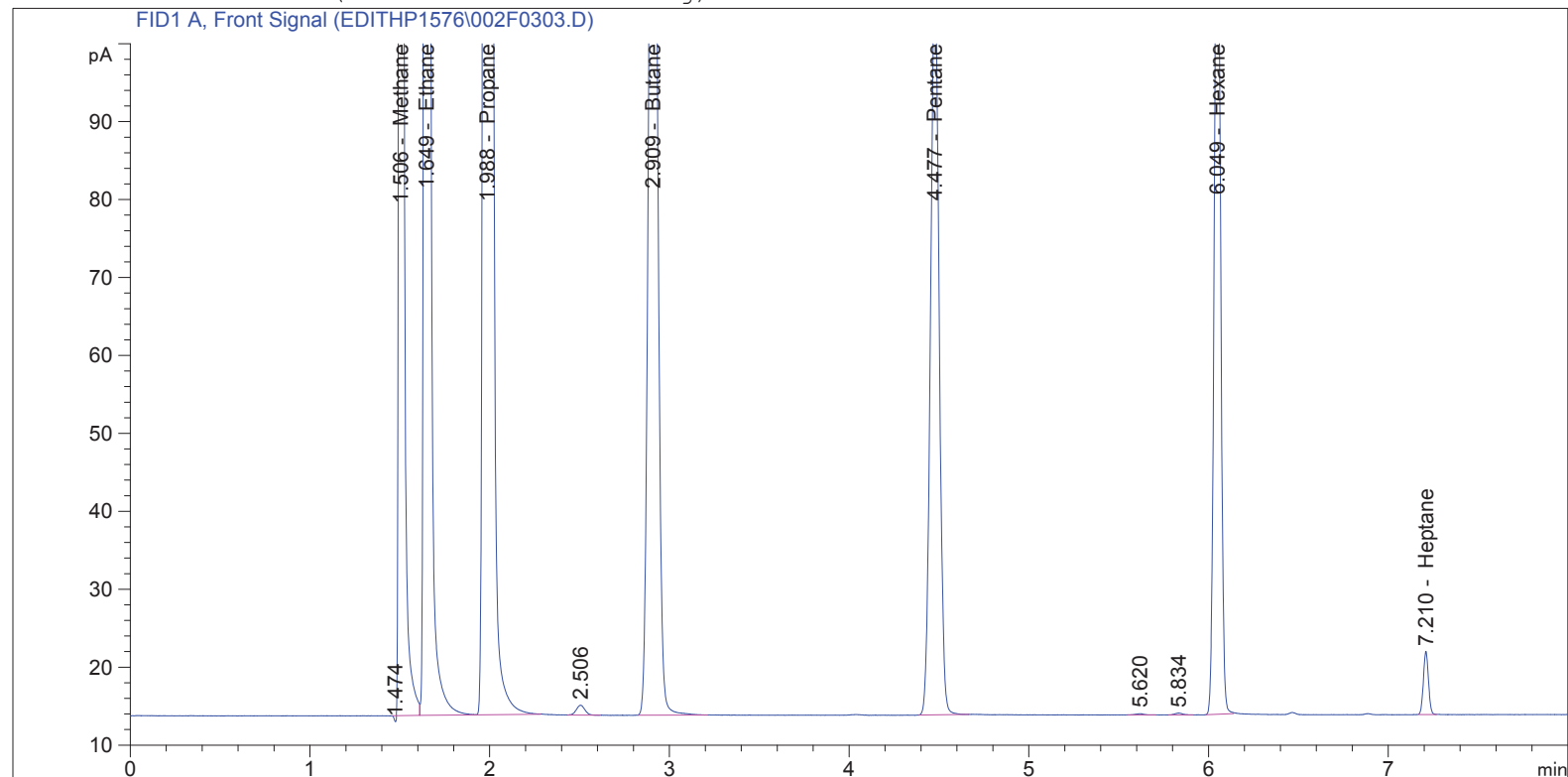
Signal 1: FID1 A, Front Signal

| Name      | Total Area<br>[pA*s] | Amount<br>[ppm] |
|-----------|----------------------|-----------------|
| as Butane | 4.12589              | 3.9316          |
| as Hexane | 1.15462              | 0.7775          |
| Methane   | 686.03040            | 2.494e3         |
| Ethane    | 1319.69446           | 2.481e3         |
| Propane   | 1980.55090           | 2.498e3         |
| Butane    | 521.80157            | 496.1996        |
| Pentane   | 314.09924            | 244.3403        |
| Hexane    | 275.69302            | 186.9649        |
| Heptane   | 15.86714             | 9.0720          |

Totals : 8414.1400

\*\*\* End of Report \*\*\*

```
=====
Acq. Operator   : Nicholas Traversa          Seq. Line :    3
Acq. Instrument : Edith                     Location  : Vial 2
Injection Date  : 11/27/2018 9:49:04 AM      Inj       :    3
                                           Inj Volume: 250 µl
Acq. Method     : C:\GC\2018\EDITH\QUARTER 4\EDITHP1576\AQ_EDITHP503_HRVOC.M
Last changed    : 8/14/2017 12:18:06 PM by Nicholas Traversa
Analysis Method : C:\GC\2018\EDITH\METHODS\EDITHP1576F_C1-C7.M
Last changed    : 12/14/2018 9:51:41 AM by Nicole West
ECM Server      : http://s022vas01/Enthalpy
ECM Operator    : Nicole West
ECM Path        : GC\2018\Edith\Quarter 4\EDITHP1576.SC.SSIzip
ECM Version     : 2 (modified after loading)
=====
```



External Standard Report

```
Sorted By           : Signal
Calib. Data Modified : 12/14/2018 9:50:22 AM
Multiplier          : 1.0000
Dilution            : 1.0000
Use Multiplier & Dilution Factor with ISTDs
```

Signal 1: FID1 A, Front Signal

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area   | Amount<br>[ppm] | Grp | Name    |
|------------------|------|----------------|------------|-----------------|-----|---------|
| 1.506            | PV   | 683.91449      | 3.63525    | 2486.19678      |     | Methane |
| 1.649            | VV   | 1315.03784     | 1.87972    | 2471.90563      |     | Ethane  |
| 1.988            | VB   | 1972.86230     | 1.26142    | 2488.61050      |     | Propane |
| 2.909            | BB   | 520.52228      | 9.50936e-1 | 494.98316       |     | Butane  |
| 4.477            | BB   | 313.22821      | 7.77907e-1 | 243.66233       |     | Pentane |
| 6.049            | BB   | 275.43805      | 6.78162e-1 | 186.79170       |     | Hexane  |
| 7.210            | BB   | 15.88176       | 5.71738e-1 | 9.08020         |     | Heptane |

Totals : 8381.23031494

Uncalibrated Peaks : using compound Propane

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area | Amount<br>[ppm] | Grp | Name |
|------------------|------|----------------|----------|-----------------|-----|------|
| 1.474            | BP N | 5.63313e-1     | 1.30084  | 7.32779e-1      | ?   |      |
| 2.506            | BB   | 4.15882        | 1.29858  | 5.40054         | ?   |      |
| 5.620            | BB   | 4.64841e-1     | 1.30084  | 6.04684e-1      | ?   |      |
| 5.834            | BB   | 6.75879e-1     | 1.30084  | 8.79209e-1      | ?   |      |

Uncalib. totals : 7.61722

Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name      | Start Time<br>[min] | End Time<br>[min] | Total Area<br>[pA*s] | Amount<br>[ppm] |
|-----------|---------------------|-------------------|----------------------|-----------------|
| as Butane | 2.500               | 3.600             | 4.15882              | 3.9630          |
| as Hexane | 5.250               | 6.600             | 1.14072              | 0.7682          |

Totals : 4.7312

1 Warnings or Errors :

Warning : Reference compound(s) not found

Final Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name      | Total Area<br>[pA*s] | Amount<br>[ppm] |
|-----------|----------------------|-----------------|
| as Butane | 4.15882              | 3.9630          |
| as Hexane | 1.14072              | 0.7682          |
| Methane   | 683.91449            | 2.486e3         |
| Ethane    | 1315.03784           | 2.472e3         |
| Propane   | 1972.86230           | 2.489e3         |
| Butane    | 520.52228            | 494.9832        |
| Pentane   | 313.22821            | 243.6623        |
| Hexane    | 275.43805            | 186.7917        |
| Heptane   | 15.88176             | 9.0802          |

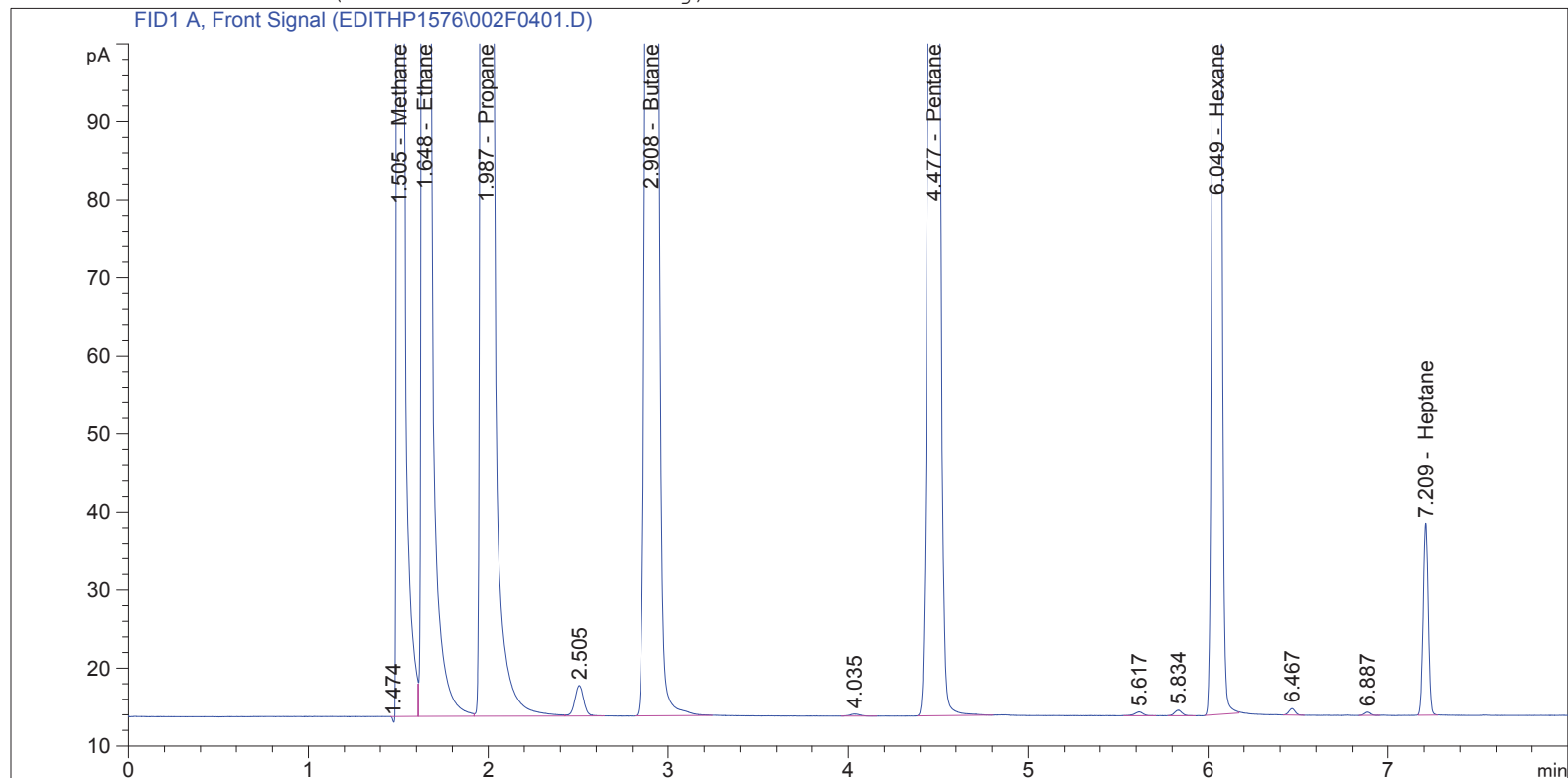
Totals : 8385.9615

\*\*\* End of Report \*\*\*

```

=====
Acq. Operator   : Nicholas Traversa           Seq. Line :    4
Acq. Instrument : Edith                     Location  : Vial 2
Injection Date  : 11/27/2018 10:05:49 AM      Inj       :    1
                                           Inj Volume: 250 µl
Acq. Method     : C:\GC\2018\EDITH\QUARTER 4\EDITHP1576\AQ_EDITHP503_HRVOC.M
Last changed    : 8/14/2017 12:18:06 PM by Nicholas Traversa
Analysis Method : C:\GC\2018\EDITH\METHODS\EDITHP1576F_C1-C7.M
Last changed    : 12/14/2018 9:51:41 AM by Nicole West
ECM Server      : http://s022vas01/Enthalpy
ECM Operator    : Nicole West
ECM Path        : GC\2018\Edith\Quarter 4\EDITHP1576.SC.SSIzip
ECM Version     : 2 (modified after loading)
=====

```



External Standard Report

```

=====
Sorted By      : Signal
Calib. Data Modified : 12/14/2018 9:50:22 AM
Multiplier     : 1.0000
Dilution      : 1.0000
Use Multiplier & Dilution Factor with ISTDs
=====

```

Signal 1: FID1 A, Front Signal

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area   | Amount<br>[ppm] | Grp | Name    |
|------------------|------|----------------|------------|-----------------|-----|---------|
| 1.505            | PV   | 2078.42896     | 3.63485    | 7554.76875      |     | Methane |
| 1.648            | VV   | 3995.80933     | 1.87967    | 7510.80073      |     | Ethane  |
| 1.987            | VV   | 6000.27979     | 1.26137    | 7568.56454      |     | Propane |
| 2.908            | BB   | 1583.58789     | 9.50870e-1 | 1505.78573      |     | Butane  |
| 4.477            | BB   | 956.35535      | 7.78190e-1 | 744.22639       |     | Pentane |
| 6.049            | BB   | 841.50397      | 6.78805e-1 | 571.21674       |     | Hexane  |
| 7.209            | BB   | 48.72845       | 5.66754e-1 | 27.61703        |     | Heptane |

Totals : 2.54830e4<sub>496</sub>

Uncalibrated Peaks : using compound Propane

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area | Amount<br>[ppm] | Grp | Name |
|------------------|------|----------------|----------|-----------------|-----|------|
| 1.474            | BP N | 4.63058e-1     | 1.30084  | 6.02363e-1      | ?   |      |
| 2.505            | VB   | 13.49588       | 1.27282  | 17.17777        | ?   |      |
| 4.035            | BB   | 1.00763        | 1.30084  | 1.31076         | ?   |      |
| 5.617            | BB   | 1.53543        | 1.30084  | 1.99735         | ?   |      |
| 5.834            | BB   | 2.03289        | 1.30084  | 2.64446         | ?   |      |
| 6.467            | BB   | 2.01859        | 1.30084  | 2.62585         | ?   |      |
| 6.887            | BB   | 9.57464e-1     | 1.30084  | 1.24551         | ?   |      |

Uncalib. totals : 27.60406

Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name       | Start Time<br>[min] | End Time<br>[min] | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|---------------------|-------------------|----------------------|-----------------|
| as Butane  | 2.500               | 3.600             | 13.49588             | 12.8605         |
| as Pentane | 3.600               | 5.250             | 1.00763              | 0.7803          |
| as Hexane  | 5.250               | 6.600             | 5.58690              | 3.7622          |
| as Heptane | 6.600               | 16.300            | 9.57464e-1           | 0.5449          |

Totals : 17.9479

1 Warnings or Errors :

Warning : Reference compound(s) not found

Final Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name       | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|----------------------|-----------------|
| as Butane  | 13.49588             | 12.8605         |
| as Pentane | 1.00763              | 0.7803          |
| as Hexane  | 5.58690              | 3.7622          |
| as Heptane | 9.57464e-1           | 0.5449          |
| Methane    | 2078.42896           | 7.555e3         |
| Ethane     | 3995.80933           | 7.511e3         |
| Propane    | 6000.27979           | 7.569e3         |
| Butane     | 1583.58789           | 1.506e3         |
| Pentane    | 956.35535            | 744.2264        |
| Hexane     | 841.50397            | 571.2167        |
| Heptane    | 48.72845             | 27.6170         |

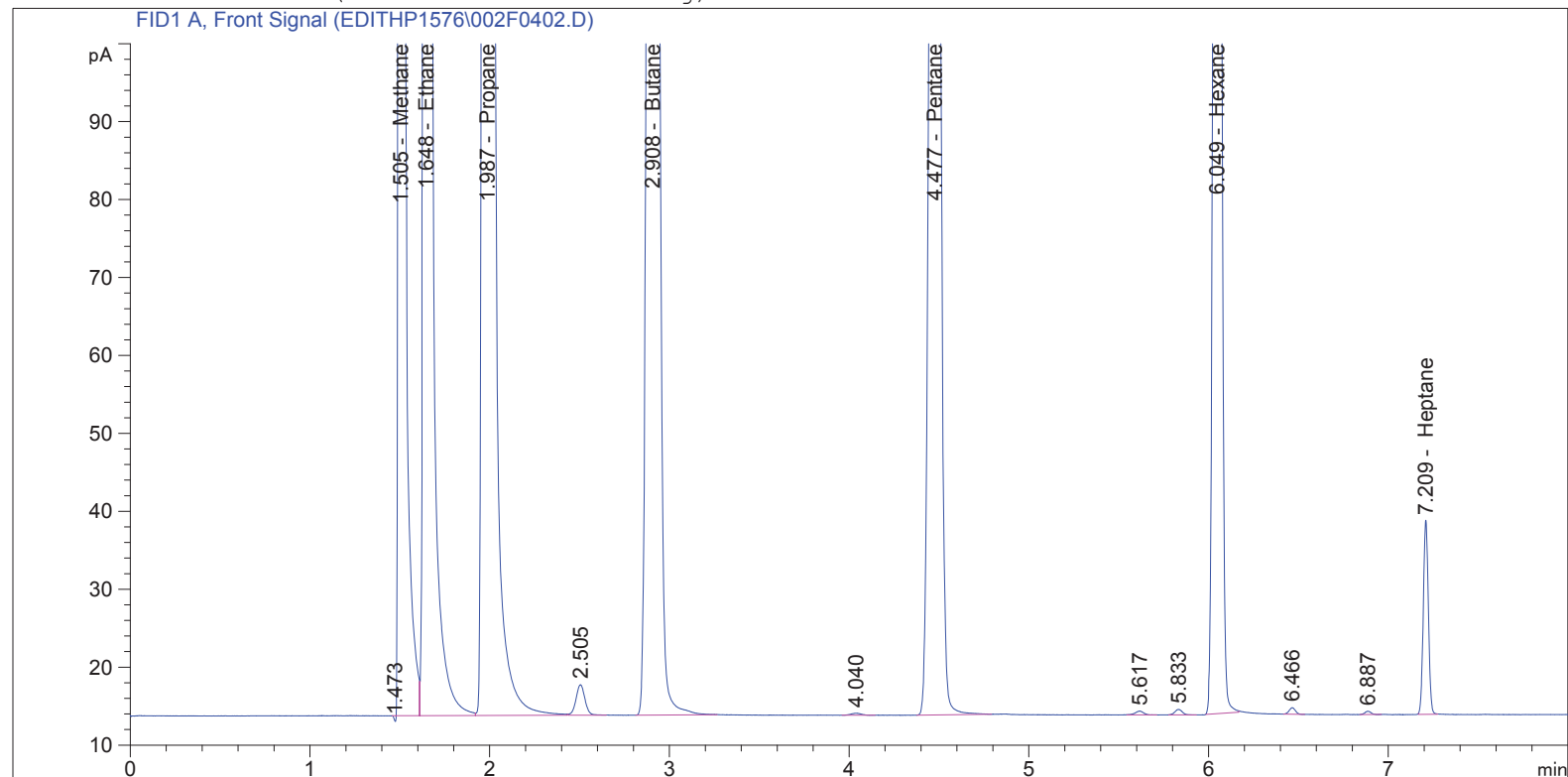
Totals : 2.5501e4

\*\*\* End of Report \*\*\*

=====

|                 |                          |            |          |
|-----------------|--------------------------|------------|----------|
| Acq. Operator   | : Nicholas Traversa      | Seq. Line  | : 4      |
| Acq. Instrument | : Edith                  | Location   | : Vial 2 |
| Injection Date  | : 11/27/2018 10:22:35 AM | Inj        | : 2      |
|                 |                          | Inj Volume | : 250 µl |

Acq. Method : C:\GC\2018\EDITH\QUARTER 4\EDITHP1576\AQ\_EDITHP503\_HRVOC.M  
Last changed : 8/14/2017 12:18:06 PM by Nicholas Traversa  
Analysis Method : C:\GC\2018\EDITH\METHODS\EDITHP1576F\_C1-C7.M  
Last changed : 12/14/2018 9:51:41 AM by Nicole West  
ECM Server : http://s022vas01/Enthalpy  
ECM Operator : Nicole West  
ECM Path : GC\2018\Edith\Quarter 4\EDITHP1576.SC.SSIzip  
ECM Version : 2 (modified after loading)



=====

External Standard Report

=====

Sorted By : Signal  
Calib. Data Modified : 12/14/2018 9:50:22 AM  
Multiplier : 1.0000  
Dilution : 1.0000  
Use Multiplier & Dilution Factor with ISTDs

Signal 1: FID1 A, Front Signal

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area   | Amount<br>[ppm] | Grp | Name    |
|------------------|------|----------------|------------|-----------------|-----|---------|
| 1.505            | PV   | 2076.99609     | 3.63485    | 7549.56080      |     | Methane |
| 1.648            | VV   | 3993.58789     | 1.87967    | 7506.62522      |     | Ethane  |
| 1.987            | VB   | 5997.00488     | 1.26137    | 7564.43376      |     | Propane |
| 2.908            | BB   | 1583.02283     | 9.50870e-1 | 1505.24845      |     | Butane  |
| 4.477            | BB   | 956.33893      | 7.78190e-1 | 744.21362       |     | Pentane |
| 6.049            | BB   | 841.85822      | 6.78805e-1 | 571.45732       |     | Hexane  |
| 7.209            | BB   | 48.90889       | 5.66745e-1 | 27.71886        |     | Heptane |

Totals : 2.54693e4<sub>498</sub>

Uncalibrated Peaks : using compound Propane

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area | Amount<br>[ppm] | Grp | Name |
|------------------|------|----------------|----------|-----------------|-----|------|
| 1.473            | BP N | 4.65423e-1     | 1.30084  | 6.05440e-1      | ?   |      |
| 2.505            | BB   | 13.46173       | 1.27285  | 17.13470        | ?   |      |
| 4.040            | BB   | 1.01272        | 1.30084  | 1.31738         | ?   |      |
| 5.617            | BB   | 1.57744        | 1.30084  | 2.05199         | ?   |      |
| 5.833            | BB   | 2.00139        | 1.30084  | 2.60349         | ?   |      |
| 6.466            | BB   | 1.99102        | 1.30084  | 2.58999         | ?   |      |
| 6.887            | BB   | 1.00472        | 1.30084  | 1.30698         | ?   |      |

Uncalib. totals : 27.60999

Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name       | Start Time<br>[min] | End Time<br>[min] | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|---------------------|-------------------|----------------------|-----------------|
| as Butane  | 2.500               | 3.600             | 13.46173             | 12.8279         |
| as Pentane | 3.600               | 5.250             | 1.01272              | 0.7843          |
| as Hexane  | 5.250               | 6.600             | 5.56985              | 3.7507          |
| as Heptane | 6.600               | 16.300            | 1.00472              | 0.5717          |

Totals : 17.9347

1 Warnings or Errors :

Warning : Reference compound(s) not found

Final Summed Peaks Report

Signal 1: FID1 A, Front Signal

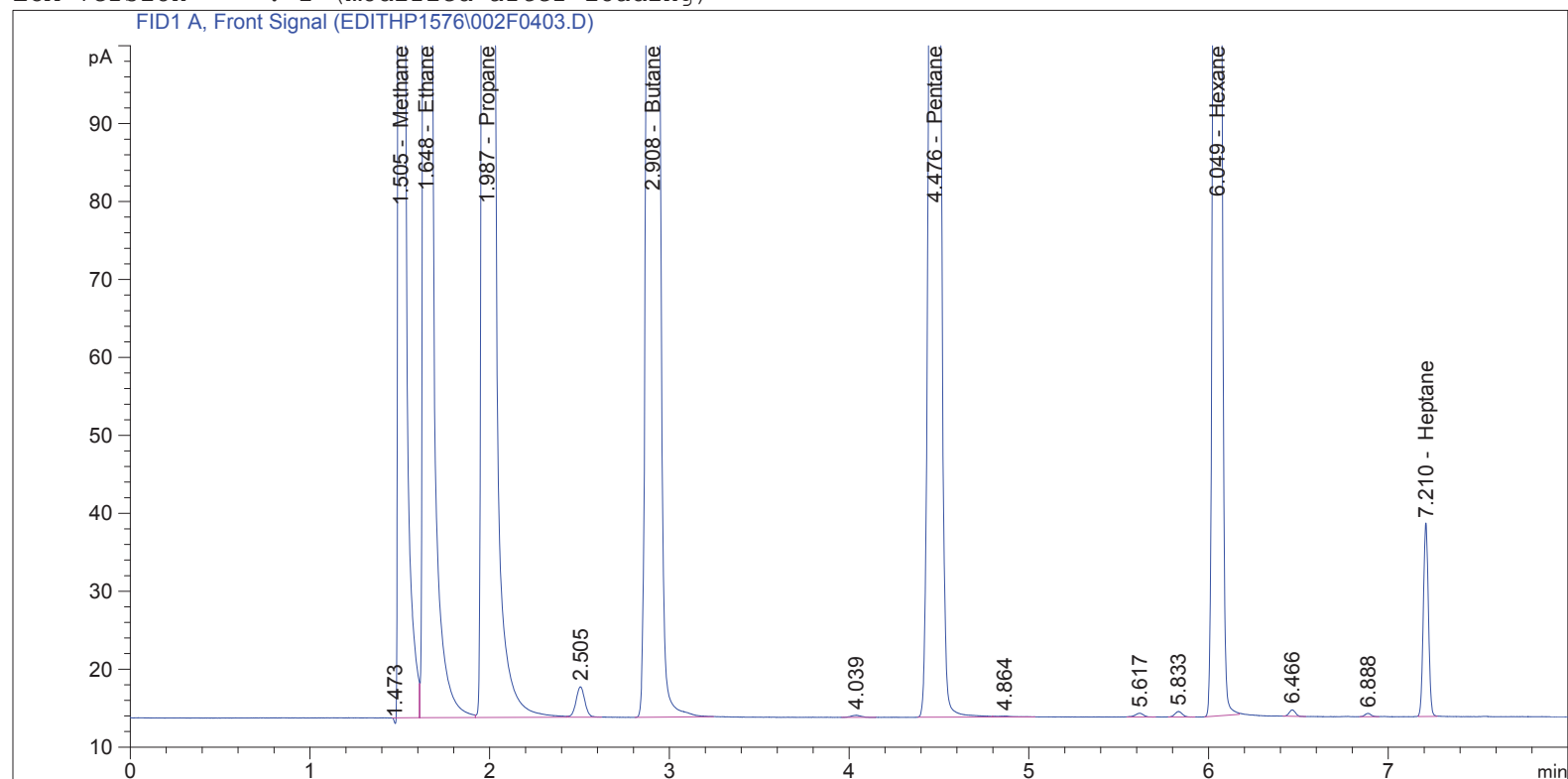
| Name       | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|----------------------|-----------------|
| as Butane  | 13.46173             | 12.8279         |
| as Pentane | 1.01272              | 0.7843          |
| as Hexane  | 5.56985              | 3.7507          |
| as Heptane | 1.00472              | 0.5717          |
| Methane    | 2076.99609           | 7.550e3         |
| Ethane     | 3993.58789           | 7.507e3         |
| Propane    | 5997.00488           | 7.564e3         |
| Butane     | 1583.02283           | 1.505e3         |
| Pentane    | 956.33893            | 744.2136        |
| Hexane     | 841.85822            | 571.4573        |
| Heptane    | 48.90889             | 27.7189         |

Totals : 2.5487e4

\*\*\* End of Report \*\*\*



=====  
Acq. Operator : Nicholas Traversa Seq. Line : 4  
Acq. Instrument : Edith Location : Vial 2  
Injection Date : 11/27/2018 10:39:25 AM Inj : 3  
Inj Volume : 250 µl  
Acq. Method : C:\GC\2018\EDITH\QUARTER 4\EDITHP1576\AQ\_EDITHP503\_HRVOC.M  
Last changed : 8/14/2017 12:18:06 PM by Nicholas Traversa  
Analysis Method : C:\GC\2018\EDITH\METHODS\EDITHP1576F\_C1-C7.M  
Last changed : 12/14/2018 9:51:41 AM by Nicole West  
ECM Server : http://s022vas01/Enthalpy  
ECM Operator : Nicole West  
ECM Path : GC\2018\Edith\Quarter 4\EDITHP1576.SC.SSIzip  
ECM Version : 2 (modified after loading)  
=====



=====  
External Standard Report  
=====

Sorted By : Signal  
Calib. Data Modified : 12/14/2018 9:50:22 AM  
Multiplier : 1.0000  
Dilution : 1.0000  
Use Multiplier & Dilution Factor with ISTDs

Signal 1: FID1 A, Front Signal

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area   | Amount<br>[ppm] | Grp | Name    |
|------------------|------|----------------|------------|-----------------|-----|---------|
| 1.505            | PV   | 2072.58789     | 3.63485    | 7533.53853      |     | Methane |
| 1.648            | VV   | 3985.13354     | 1.87967    | 7490.73406      |     | Ethane  |
| 1.987            | VB   | 5984.51855     | 1.26137    | 7548.68422      |     | Propane |
| 2.908            | BB   | 1579.82910     | 9.50870e-1 | 1502.21173      |     | Butane  |
| 4.476            | BB   | 955.99188      | 7.78190e-1 | 743.94350       |     | Pentane |
| 6.049            | BB   | 841.28217      | 6.78804e-1 | 571.06611       |     | Hexane  |
| 7.210            | BB   | 48.86404       | 5.66747e-1 | 27.69355        |     | Heptane |

Totals : 2.54179e4<sub>500</sub>

Uncalibrated Peaks : using compound Propane

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area | Amount<br>[ppm] | Grp | Name |
|------------------|------|----------------|----------|-----------------|-----|------|
| 1.473            | BP N | 4.65565e-1     | 1.30084  | 6.05625e-1      | ?   |      |
| 2.505            | BB   | 13.25031       | 1.27303  | 16.86803        | ?   |      |
| 4.039            | BB   | 1.00364        | 1.30084  | 1.30557         | ?   |      |
| 4.864            | BB   | 7.77603e-1     | 1.30084  | 1.01154         | ?   |      |
| 5.617            | BB   | 1.54241        | 1.30084  | 2.00642         | ?   |      |
| 5.833            | BB   | 1.98681        | 1.30084  | 2.58452         | ?   |      |
| 6.466            | BB   | 1.98251        | 1.30084  | 2.57893         | ?   |      |
| 6.888            | BB   | 1.01848        | 1.30084  | 1.32488         | ?   |      |

Uncalib. totals : 28.28552

Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name       | Start Time<br>[min] | End Time<br>[min] | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|---------------------|-------------------|----------------------|-----------------|
| as Butane  | 2.500               | 3.600             | 13.25031             | 12.6265         |
| as Pentane | 3.600               | 5.250             | 1.78124              | 1.3794          |
| as Hexane  | 5.250               | 6.600             | 5.51173              | 3.7116          |
| as Heptane | 6.600               | 16.300            | 1.01848              | 0.5796          |

Totals : 18.2971

1 Warnings or Errors :

Warning : Reference compound(s) not found

Final Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name       | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|----------------------|-----------------|
| as Butane  | 13.25031             | 12.6265         |
| as Pentane | 1.78124              | 1.3794          |
| as Hexane  | 5.51173              | 3.7116          |
| as Heptane | 1.01848              | 0.5796          |
| Methane    | 2072.58789           | 7.534e3         |
| Ethane     | 3985.13354           | 7.491e3         |
| Propane    | 5984.51855           | 7.549e3         |
| Butane     | 1579.82910           | 1.502e3         |
| Pentane    | 955.99188            | 743.9435        |
| Hexane     | 841.28217            | 571.0661        |
| Heptane    | 48.86404             | 27.6936         |

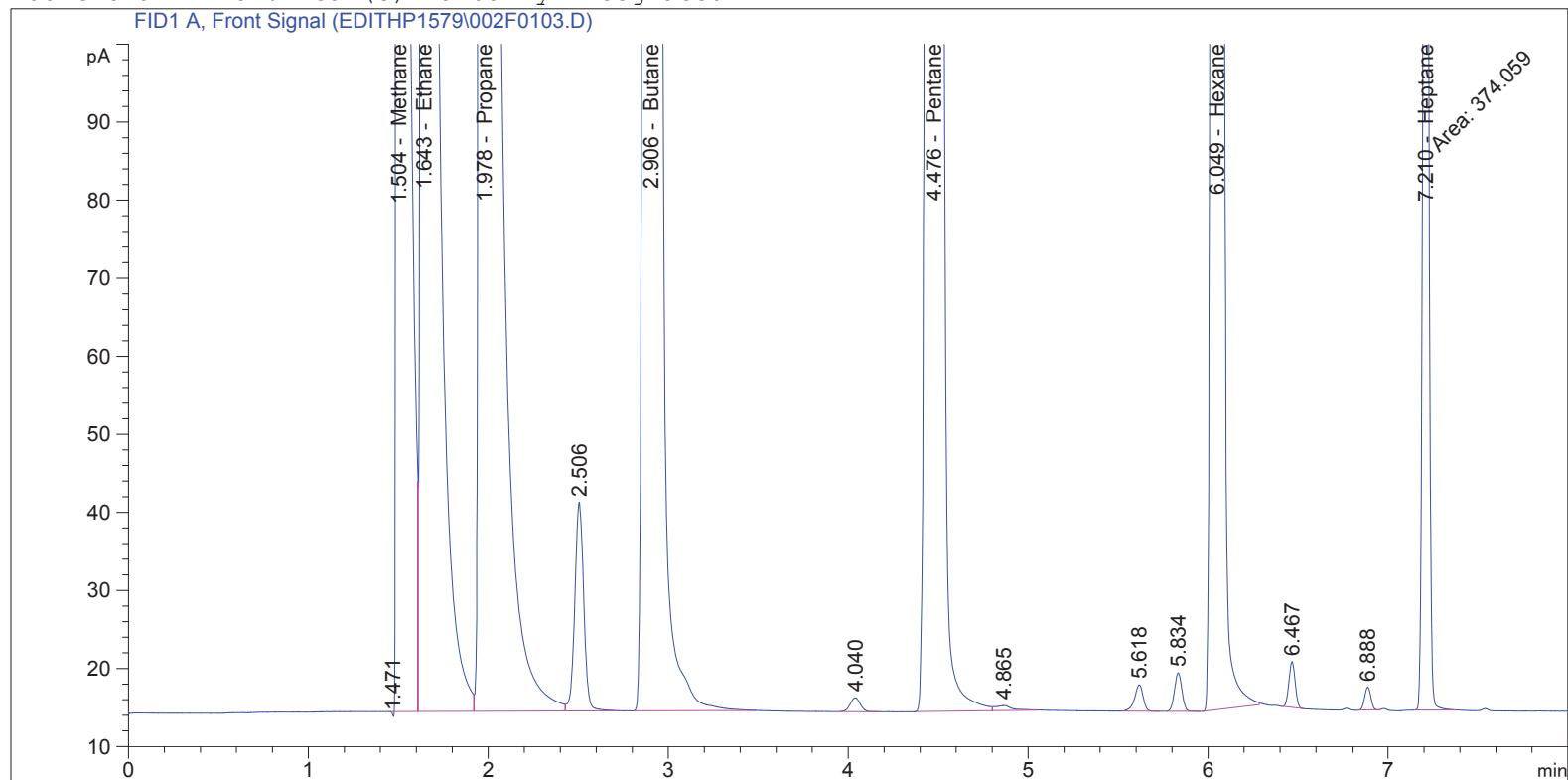
Totals : 2.5436e4

\*\*\* End of Report \*\*\*

=====

Acq. Operator : Nicholas Traversa Seq. Line : 1  
Acq. Instrument : Edith Location : Vial 2  
Injection Date : 11/29/2018 10:57:57 AM Inj : 3  
Inj Volume : 250 µl

Acq. Method : C:\GC\2018\EDITH\QUARTER 4\EDITHP1579\AQ\_EDITHP503\_HRVOC.M  
Last changed : 8/14/2017 12:18:06 PM by Nicholas Traversa  
Analysis Method : C:\GC\2018\EDITH\METHODS\EDITHP1576F\_C1-C7.M  
Last changed : 12/14/2018 9:51:41 AM by Nicole West  
ECM Server : http://s022vas01/Enthalpy  
ECM Operator : Nicole West  
ECM Path : GC\2018\Edith\Quarter 4\EDITHP1579.SC.SSIzip  
ECM Version : 1 (modified after loading)  
Additional Info : Peak(s) manually integrated



=====

External Standard Report

=====

Sorted By : Signal  
Calib. Data Modified : 12/14/2018 9:50:22 AM  
Multiplier : 1.0000  
Dilution : 1.0000  
Use Multiplier & Dilution Factor with ISTDs

Signal 1: FID1 A, Front Signal

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area   | Amount<br>[ppm] | Grp | Name    |
|------------------|------|----------------|------------|-----------------|-----|---------|
| 1.504            | PV   | 1.40291e4      | 3.63468    | 5.09913e4       |     | Methane |
| 1.643            | VV   | 2.69759e4      | 1.87965    | 5.07051e4       |     | Ethane  |
| 1.978            | VV   | 4.05528e4      | 1.26135    | 5.11512e4       |     | Propane |
| 2.906            | BB   | 1.07922e4      | 9.50842e-1 | 1.02617e4       |     | Butane  |
| 4.476            | BV   | 6600.19092     | 7.78308e-1 | 5136.98344      |     | Pentane |
| 6.049            | BB   | 6003.61182     | 6.79073e-1 | 4076.89241      |     | Hexane  |
| 7.210            | MM   | 374.05896      | 5.64658e-1 | 211.21534       |     | Heptane |

Totals : 1.72534e5

Uncalibrated Peaks : using compound Propane

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area | Amount<br>[ppm] | Grp | Name |
|------------------|------|----------------|----------|-----------------|-----|------|
| 1.471            | BP N | 3.21462e-1     | 1.30084  | 4.18170e-1      | ?   |      |
| 2.506            | VB   | 92.56744       | 1.26302  | 116.91411       | ?   |      |
| 4.040            | BB   | 6.93200        | 1.28368  | 8.89847         | ?   |      |
| 4.865            | VB   | 4.33401        | 1.29707  | 5.62152         | ?   |      |
| 5.618            | BB   | 11.03230       | 1.27538  | 14.07036        | ?   |      |
| 5.834            | BB   | 14.06593       | 1.27235  | 17.89681        | ?   |      |
| 6.467            | BB   | 14.20183       | 1.27225  | 18.06822        | ?   |      |
| 6.888            | BB   | 6.90864        | 1.28376  | 8.86901         | ?   |      |

Uncalib. totals : 190.75667

Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name       | Start Time<br>[min] | End Time<br>[min] | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|---------------------|-------------------|----------------------|-----------------|
| as Butane  | 2.500               | 3.600             | 92.56744             | 88.2093         |
| as Pentane | 3.600               | 5.250             | 11.26601             | 8.7246          |
| as Hexane  | 5.250               | 6.600             | 39.30007             | 26.4647         |
| as Heptane | 6.600               | 16.300            | 6.90864              | 3.9314          |

Totals : 127.3299

1 Warnings or Errors :

Warning : Reference compound(s) not found

Final Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name       | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|----------------------|-----------------|
| as Butane  | 92.56744             | 88.2093         |
| as Pentane | 11.26601             | 8.7246          |
| as Hexane  | 39.30007             | 26.4647         |
| as Heptane | 6.90864              | 3.9314          |
| Methane    | 1.40291e4            | 5.099e4         |
| Ethane     | 2.69759e4            | 5.071e4         |
| Propane    | 4.05528e4            | 5.115e4         |
| Butane     | 1.07922e4            | 1.026e4         |
| Pentane    | 6600.19092           | 5.137e3         |
| Hexane     | 6003.61182           | 4.077e3         |
| Heptane    | 374.05896            | 211.2153        |

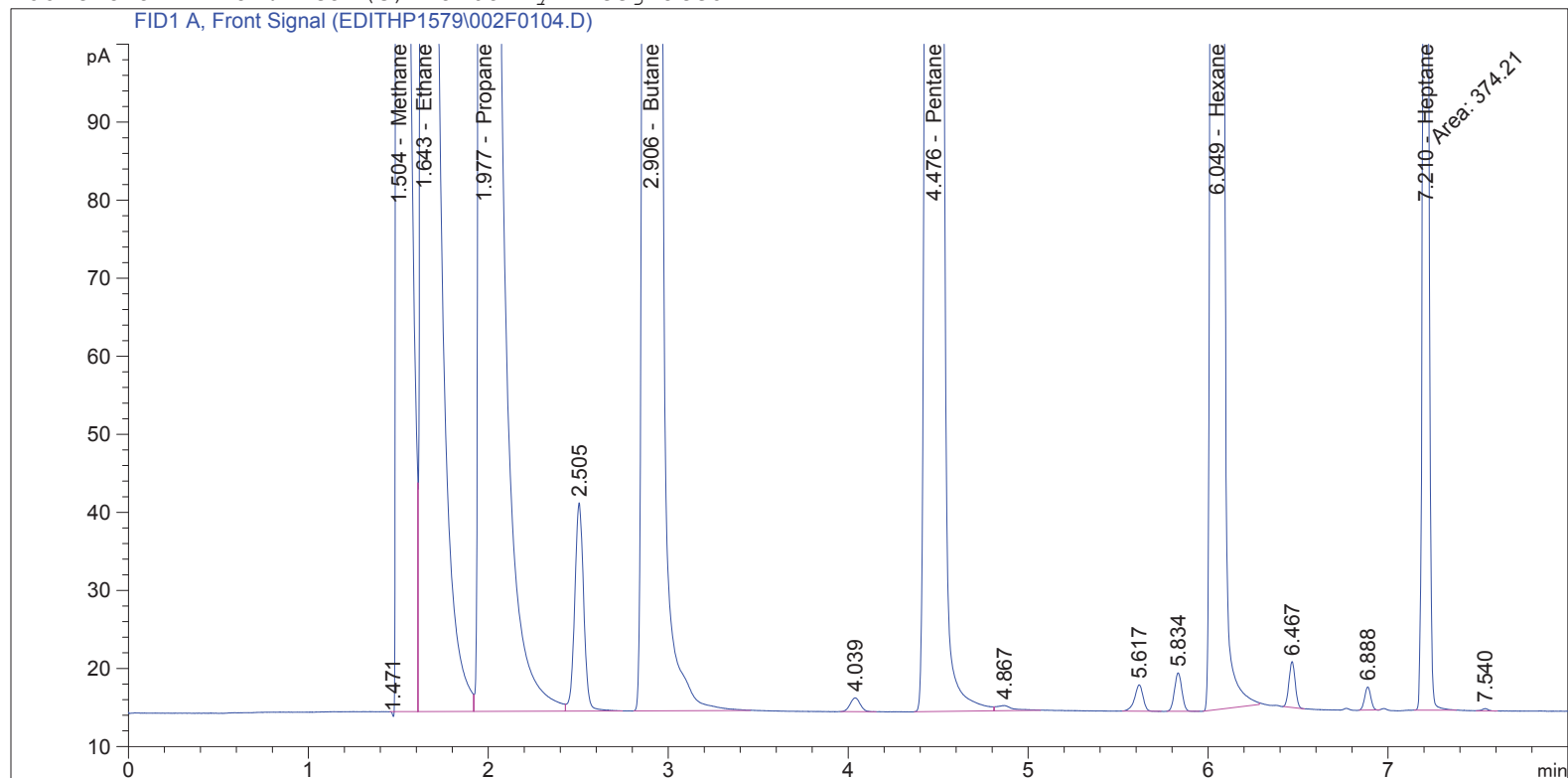
Totals : 1.7266e5

\*\*\* End of Report \*\*\*

=====

Acq. Operator : Nicholas Traversa Seq. Line : 1  
Acq. Instrument : Edith Location : Vial 2  
Injection Date : 11/29/2018 11:14:40 AM Inj : 4  
Inj Volume : 250 µl

Acq. Method : C:\GC\2018\EDITH\QUARTER 4\EDITHP1579\AQ\_EDITHP503\_HRVOC.M  
Last changed : 8/14/2017 12:18:06 PM by Nicholas Traversa  
Analysis Method : C:\GC\2018\EDITH\METHODS\EDITHP1576F\_C1-C7.M  
Last changed : 12/14/2018 9:51:41 AM by Nicole West  
ECM Server : http://s022vas01/Enthalpy  
ECM Operator : Nicole West  
ECM Path : GC\2018\Edith\Quarter 4\EDITHP1579.SC.SSIzip  
ECM Version : 1 (modified after loading)  
Additional Info : Peak(s) manually integrated



=====

External Standard Report

=====

Sorted By : Signal  
Calib. Data Modified : 12/14/2018 9:50:22 AM  
Multiplier : 1.0000  
Dilution : 1.0000  
Use Multiplier & Dilution Factor with ISTDs

Signal 1: FID1 A, Front Signal

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area   | Amount<br>[ppm] | Grp | Name    |
|------------------|------|----------------|------------|-----------------|-----|---------|
| 1.504            | PV   | 1.39959e4      | 3.63468    | 5.08705e4       |     | Methane |
| 1.643            | VV   | 2.69101e4      | 1.87965    | 5.05815e4       |     | Ethane  |
| 1.977            | VV   | 4.04556e4      | 1.26135    | 5.10286e4       |     | Propane |
| 2.906            | BB   | 1.07665e4      | 9.50842e-1 | 1.02372e4       |     | Butane  |
| 4.476            | BV   | 6586.56982     | 7.78308e-1 | 5126.38176      |     | Pentane |
| 6.049            | BB   | 5993.73096     | 6.79073e-1 | 4070.18215      |     | Hexane  |
| 7.210            | MM   | 374.21008      | 5.64658e-1 | 211.30063       |     | Heptane |

Totals : 1.72126e5

Uncalibrated Peaks : using compound Propane

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area | Amount<br>[ppm] | Grp | Name |
|------------------|------|----------------|----------|-----------------|-----|------|
| 1.471            | BP N | 3.29428e-1     | 1.30084  | 4.28532e-1      | ?   |      |
| 2.505            | VB   | 92.59371       | 1.26302  | 116.94726       | ?   |      |
| 4.039            | BB   | 6.83739        | 1.28399  | 8.77914         | ?   |      |
| 4.867            | VB   | 4.29990        | 1.29735  | 5.57850         | ?   |      |
| 5.617            | BB   | 11.05684       | 1.27535  | 14.10131        | ?   |      |
| 5.834            | BB   | 14.06647       | 1.27235  | 17.89749        | ?   |      |
| 6.467            | BB   | 14.17977       | 1.27226  | 18.04040        | ?   |      |
| 6.888            | BB   | 6.91731        | 1.28373  | 8.87995         | ?   |      |
| 7.540            | BB   | 6.13440e-1     | 1.30084  | 7.97986e-1      | ?   |      |

Uncalib. totals : 191.45056

Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name       | Start Time<br>[min] | End Time<br>[min] | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|---------------------|-------------------|----------------------|-----------------|
| as Butane  | 2.500               | 3.600             | 92.59371             | 88.2343         |
| as Pentane | 3.600               | 5.250             | 11.13730             | 8.6249          |
| as Hexane  | 5.250               | 6.600             | 39.30309             | 26.4667         |
| as Heptane | 6.600               | 16.300            | 7.53075              | 4.2854          |

Totals : 127.6114

1 Warnings or Errors :

Warning : Reference compound(s) not found

Final Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name       | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|----------------------|-----------------|
| as Butane  | 92.59371             | 88.2343         |
| as Pentane | 11.13730             | 8.6249          |
| as Hexane  | 39.30309             | 26.4667         |
| as Heptane | 7.53075              | 4.2854          |
| Methane    | 1.39959e4            | 5.087e4         |
| Ethane     | 2.69101e4            | 5.058e4         |
| Propane    | 4.04556e4            | 5.103e4         |
| Butane     | 1.07665e4            | 1.024e4         |
| Pentane    | 6586.56982           | 5.126e3         |
| Hexane     | 5993.73096           | 4.070e3         |
| Heptane    | 374.21008            | 211.3006        |

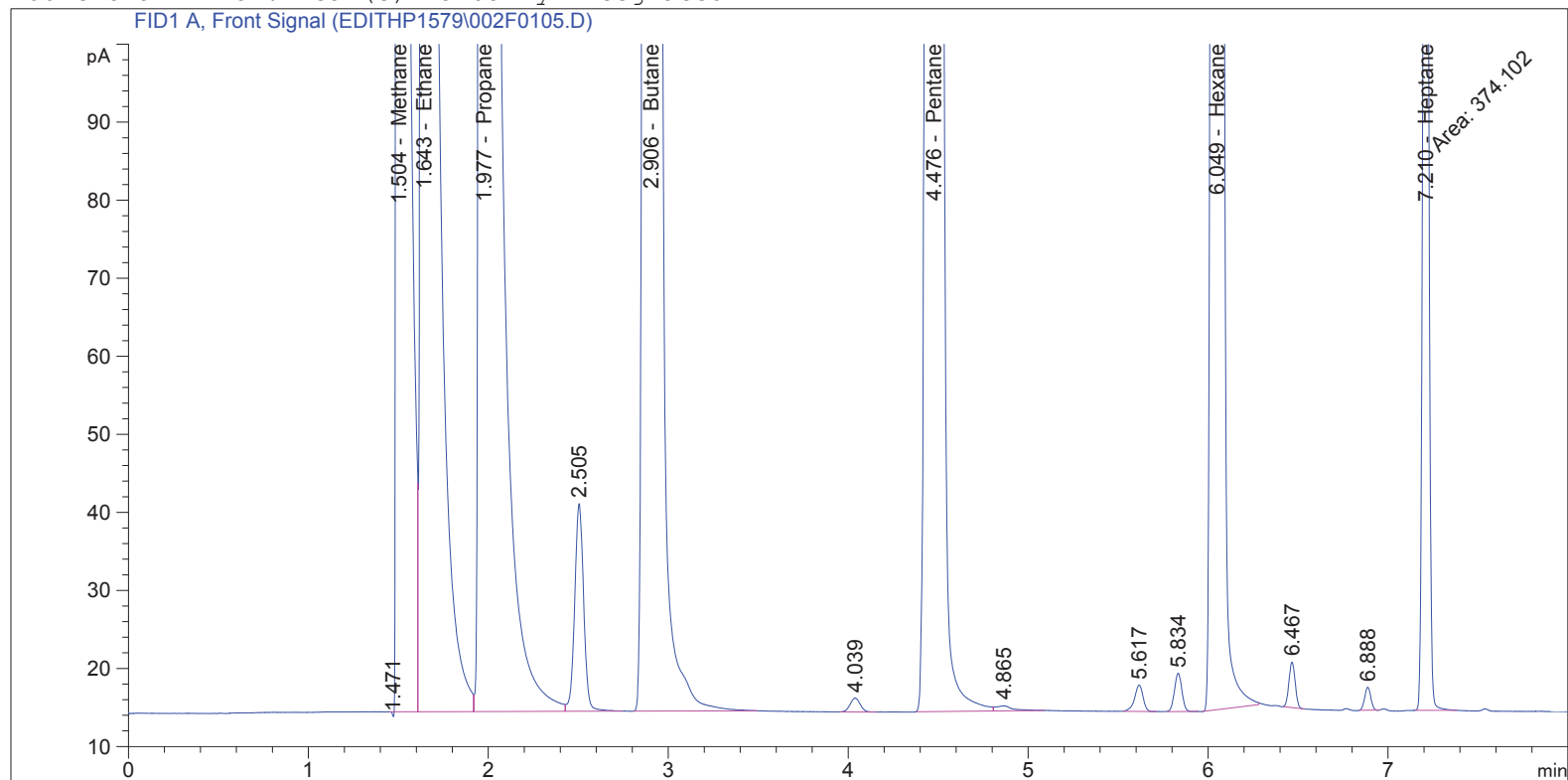
Totals : 1.7225e5

\*\*\* End of Report \*\*\*

=====

Acq. Operator : Nicholas Traversa Seq. Line : 1  
Acq. Instrument : Edith Location : Vial 2  
Injection Date : 11/29/2018 11:31:21 AM Inj : 5  
Inj Volume : 250 µl

Acq. Method : C:\GC\2018\EDITH\QUARTER 4\EDITHP1579\AQ\_EDITHP503\_HRVOC.M  
Last changed : 8/14/2017 12:18:06 PM by Nicholas Traversa  
Analysis Method : C:\GC\2018\EDITH\METHODS\EDITHP1576F\_C1-C7.M  
Last changed : 12/14/2018 9:51:41 AM by Nicole West  
ECM Server : http://s022vas01/Enthalpy  
ECM Operator : Nicole West  
ECM Path : GC\2018\Edith\Quarter 4\EDITHP1579.SC.SSIzip  
ECM Version : 1 (modified after loading)  
Additional Info : Peak(s) manually integrated



=====

External Standard Report

=====

Sorted By : Signal  
Calib. Data Modified : 12/14/2018 9:50:22 AM  
Multiplier : 1.0000  
Dilution : 1.0000  
Use Multiplier & Dilution Factor with ISTDs

Signal 1: FID1 A, Front Signal

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area   | Amount<br>[ppm] | Grp | Name    |
|------------------|------|----------------|------------|-----------------|-----|---------|
| 1.504            | PV   | 1.39684e4      | 3.63468    | 5.07708e4       |     | Methane |
| 1.643            | VV   | 2.68608e4      | 1.87965    | 5.04888e4       |     | Ethane  |
| 1.977            | VV   | 4.03811e4      | 1.26135    | 5.09346e4       |     | Propane |
| 2.906            | BB   | 1.07484e4      | 9.50842e-1 | 1.02200e4       |     | Butane  |
| 4.476            | BV   | 6575.08643     | 7.78308e-1 | 5117.44390      |     | Pentane |
| 6.049            | BB   | 5986.30518     | 6.79073e-1 | 4065.13918      |     | Hexane  |
| 7.210            | MM   | 374.10193      | 5.64658e-1 | 211.23959       |     | Heptane |

Totals : 1.71808e5

Uncalibrated Peaks : using compound Propane

| RetTime<br>[min] | Type | Area<br>[pA*s] | Amt/Area | Amount<br>[ppm] | Grp | Name |
|------------------|------|----------------|----------|-----------------|-----|------|
| 1.471            | BP N | 3.22791e-1     | 1.30084  | 4.19899e-1      | ?   |      |
| 2.505            | VB   | 92.41842       | 1.26302  | 116.72615       | ?   |      |
| 4.039            | BB   | 6.87014        | 1.28388  | 8.82044         | ?   |      |
| 4.865            | VB   | 4.41804        | 1.29639  | 5.72751         | ?   |      |
| 5.617            | BB   | 11.11505       | 1.27527  | 14.17473        | ?   |      |
| 5.834            | BB   | 14.08544       | 1.27234  | 17.92141        | ?   |      |
| 6.467            | BB   | 14.09875       | 1.27233  | 17.93820        | ?   |      |
| 6.888            | BB   | 6.88028        | 1.28385  | 8.83324         | ?   |      |

Uncalib. totals : 190.56158

Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name       | Start Time<br>[min] | End Time<br>[min] | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|---------------------|-------------------|----------------------|-----------------|
| as Butane  | 2.500               | 3.600             | 92.41842             | 88.0673         |
| as Pentane | 3.600               | 5.250             | 11.28818             | 8.7418          |
| as Hexane  | 5.250               | 6.600             | 39.29923             | 26.4641         |
| as Heptane | 6.600               | 16.300            | 6.88028              | 3.9153          |

Totals : 127.1884

1 Warnings or Errors :

Warning : Reference compound(s) not found

Final Summed Peaks Report

Signal 1: FID1 A, Front Signal

| Name       | Total Area<br>[pA*s] | Amount<br>[ppm] |
|------------|----------------------|-----------------|
| as Butane  | 92.41842             | 88.0673         |
| as Pentane | 11.28818             | 8.7418          |
| as Hexane  | 39.29923             | 26.4641         |
| as Heptane | 6.88028              | 3.9153          |
| Methane    | 1.39684e4            | 5.077e4         |
| Ethane     | 2.68608e4            | 5.049e4         |
| Propane    | 4.03811e4            | 5.093e4         |
| Butane     | 1.07484e4            | 1.022e4         |
| Pentane    | 6575.08643           | 5.117e3         |
| Hexane     | 5986.30518           | 4.065e3         |
| Heptane    | 374.10193            | 211.2396        |

Totals : 1.7194e5

\*\*\* End of Report \*\*\*



## CERTIFICATE OF ANALYSIS

### Grade of Product: CERTIFIED STANDARD-SPEC

|                  |                                 |                    |                 |
|------------------|---------------------------------|--------------------|-----------------|
| Part Number:     | X08NI99C15A0079                 | Reference Number:  | 141-401159104-1 |
| Cylinder Number: | CC703691                        | Cylinder Volume:   | 144.4 CF        |
| Laboratory:      | 124 - Conley Stryker (SAP) - OH | Cylinder Pressure: | 2015 PSIG       |
| Analysis Date:   | Mar 21, 2018                    | Valve Outlet:      | 350             |
| Lot Number:      | 141-401159104-1                 |                    |                 |

Expiration Date: Mar 21, 2021

Product composition verified by direct comparison to calibration standards traceable to N.I.S.T. weights and/or N.I.S.T. Gas Mixture reference materials.

### ANALYTICAL RESULTS

| Component | Req Conc  | Actual Concentration<br>(Mole %) | Analytical<br>Uncertainty |
|-----------|-----------|----------------------------------|---------------------------|
| ETHANE    | 100.0 PPM | 102.0 PPM                        | +/- 2%                    |
| HEXANE    | 100.0 PPM | 102.0 PPM                        | +/- 2%                    |
| METHANE   | 100.0 PPM | 102.0 PPM                        | +/- 2%                    |
| N BUTANE  | 100.0 PPM | 102.0 PPM                        | +/- 2%                    |
| N HEPTANE | 100.0 PPM | 102.0 PPM                        | +/- 2%                    |
| N PENTANE | 100.0 PPM | 102.0 PPM                        | +/- 2%                    |
| PROPANE   | 100.0 PPM | 102.0 PPM                        | +/- 2%                    |
| NITROGEN  | Balance   |                                  |                           |

  
Approved for Release

**Airgas USA, LLC**

616 Miller Cut Off Rd.

LaPorte, TX 77571

281-842-6900

Airgas.com

**CERTIFICATE OF ANALYSIS****Grade of Product: CERTIFIED HYDROCARBON**

Customer: MONTROSE ENVIRONMENTAL GROUP - LA PORTE, TX

Part: X08NI83C15AC015

Number:

Cylinder: CC172313

Number:

Laboratory: 124 - LaPorte Mix (SAP) - TX

Analysis: Apr 10, 2018

Date:

Lot Number: 126-401156534-1

Reference Number: 126-401156534-1

Cylinder Volume: 37.2 CF

Cylinder Pressure: 500 PSIG

Valve Outlet: 350

Expiration Date: Apr 10, 2021

Traceability Statement: Hydrocarbon Process standards are NIST traceable either directly by weight or by comparison to Airgas laboratory standards that are directly NIST traceable by weight.

**CERTIFIED CONCENTRATIONS**

| Component | Requested Concentration | Reported Mole % | Accuracy |
|-----------|-------------------------|-----------------|----------|
| N HEPTANE | 250.0 PPM               | 250.2 PPM       | -/- 2%   |
| HEXANE    | 0.4000 %                | 0.4000 %        | +/- 2%   |
| N PENTANE | 0.5000 %                | 0.4998 %        | +/- 2%   |
| N BUTANE  | 1.000 %                 | 1.001 %         | +/- 2%   |
| ETHANE    | 5.000 %                 | 5.002 %         | +/- 2%   |
| METHANE   | 5.000 %                 | 4.998 %         | +/- 2%   |
| PROPANE   | 5.000 %                 | 5.012 %         | +/- 2%   |
| NITROGEN  | Balance                 | Balance         |          |

**Notes:**

MONTROSE ENVIRONMENTAL GROUP

PO#: 1017793

  
Approved for Release

=====

Agilent 7890A

=====

Oven  
Equilibration Time 0.3 min  
Max Temperature 200 degrees C  
Slow Fan Disabled  
Oven Program On  
    35 °C for 2.2 min  
    then 15 °C/min to 70 °C for 0.07 min  
Run Time 4.6033 min

Sample Overlap  
Sample overlap is not enabled

Front SS Inlet H2  
Mode Split  
Heater On 200 °C  
Pressure On 5.1931 psi  
Total Flow On 15.6 mL/min  
Septum Purge Flow On 3 mL/min  
Gas Saver Off  
Split Ratio 5 :1  
Split Flow 10.5 mL/min

Back SS Inlet H2  
Mode Split  
Heater On 200 °C  
Pressure On 14.935 psi  
Total Flow On 25.632 mL/min  
Septum Purge Flow On 3 mL/min  
Gas Saver Off  
Split Ratio 2 :1  
Split Flow 15.088 mL/min

Column #1  
Restek 10198Rtx-1 S/N 1452467  
280 °C: 30 m x 320 µm x 4 µm  
In: Front SS Inlet H2  
Out: Front Detector FID

(Initial) 35 °C  
Pressure 5.1931 psi  
Flow 2.1 mL/min  
Average Velocity 39.91 cm/sec  
Holdup Time 1.2528 min  
Flow Program On  
    2.1 mL/min for 0 min  
Run Time 4.6033 min

Column #2  
Restek 19757Rt-Alumina BOND/Na2SO4  
200 °C: 30 m x 320 µm x 5 µm  
In: Back SS Inlet H2  
Out: Back Detector FID

(Initial) 35 °C  
Pressure 14.935 psi  
Flow 7.5439 mL/min  
Average Velocity 110 cm/sec  
Holdup Time 0.45455 min  
Flow Program On  
    7.5439 mL/min for 0 min

510

Modified on: 8/14/2017 at 12:20:10 PM

|                         |                   |
|-------------------------|-------------------|
| Run Time                | 4.6033 min        |
| Front Detector FID      |                   |
| Heater                  | On 300 °C         |
| H2 Flow                 | On 50 mL/min      |
| Air Flow                | On 450 mL/min     |
| Makeup Flow             | On 35 mL/min      |
| Const Col + Makeup      | Off               |
| Flame                   | On                |
| Electrometer            | On                |
| Back Detector FID       |                   |
| Heater                  | On 200 °C         |
| H2 Flow                 | On 50 mL/min      |
| Air Flow                | On 450 mL/min     |
| Makeup Flow             | On 35 mL/min      |
| Const Col + Makeup      | Off               |
| Flame                   | On                |
| Electrometer            | On                |
| Valve 1                 |                   |
| Gas Sampling Valve      | Unknown           |
| GSV Loop Volume         | 0.25 mL           |
| Load Time               | 1.5 min           |
| Inject Time             | 0.5 min           |
| Valve 2                 |                   |
| Gas Sampling Valve      | Unknown           |
| GSV Loop Volume         | 0.25 mL           |
| Load Time               | 1.5 min           |
| Inject Time             | 0.5 min           |
| Valve Box               |                   |
| Heater                  | On 150 °C         |
| Signals                 |                   |
| Signal #1: Front Signal | Save On<br>20 Hz  |
| Signal #2: Test Plot    | Save Off<br>50 Hz |
| Signal #3: Back Signal  | Save On<br>20 Hz  |
| Signal #4: Test Plot    | Save Off<br>50 Hz |

=====

Agilent 7890A

=====

Oven  
Equilibration Time 0.3 min  
Max Temperature 200 degrees C  
Slow Fan Disabled  
Oven Program On  
    35 °C for 2.2 min  
#1 then 15 °C/min to 70 °C for 0.07 min  
#2 then 30 °C/min to 180 °C for 1 min  
Run Time 9.27 min

Sample Overlap  
Sample overlap is not enabled

Front SS Inlet H2  
Mode Split  
Heater On 200 °C  
Pressure On 5.1931 psi  
Total Flow On 15.6 mL/min  
Septum Purge Flow On 3 mL/min  
Gas Saver Off  
Split Ratio 5 :1  
Split Flow 10.5 mL/min

Back SS Inlet H2  
Mode Split  
Heater On 200 °C  
Pressure On 14.935 psi  
Total Flow On 25.632 mL/min  
Septum Purge Flow On 3 mL/min  
Gas Saver Off  
Split Ratio 2 :1  
Split Flow 15.088 mL/min

Column #1  
Restek 10198Rtx-1 S/N 1452467  
280 °C: 30 m x 320 µm x 4 µm  
In: Front SS Inlet H2  
Out: Front Detector FID

(Initial) 35 °C  
Pressure 5.1931 psi  
Flow 2.1 mL/min  
Average Velocity 39.91 cm/sec  
Holdup Time 1.2528 min  
Flow Program On  
    2.1 mL/min for 0 min  
Run Time 9.27 min

Column #2  
Restek 19757Rt-Alumina BOND/Na2SO4  
200 °C: 30 m x 320 µm x 5 µm  
In: Back SS Inlet H2  
Out: Back Detector FID

(Initial) 35 °C  
Pressure 14.935 psi  
Flow 7.5439 mL/min  
Average Velocity 110 cm/sec  
Holdup Time 0.45455 min  
Flow Program On

512

Modified on: 8/14/2017 at 12:18:06 PM

7.5439 mL/min for 0 min

Run Time 9.27 min

# Front Detector FID

|                    |     |            |
|--------------------|-----|------------|
| Heater             | On  | 300 °C     |
| H2 Flow            | On  | 50 mL/min  |
| Air Flow           | On  | 450 mL/min |
| Makeup Flow        | On  | 35 mL/min  |
| Const Col + Makeup | Off |            |
| Flame              | On  |            |
| Electrometer       | On  |            |

# Back Detector FID

|                    |     |            |
|--------------------|-----|------------|
| Heater             | On  | 200 °C     |
| H2 Flow            | On  | 50 mL/min  |
| Air Flow           | On  | 450 mL/min |
| Makeup Flow        | On  | 35 mL/min  |
| Const Col + Makeup | Off |            |
| Flame              | On  |            |
| Electrometer       | On  |            |

# Valve 1

|                    |         |
|--------------------|---------|
| Gas Sampling Valve | Unknown |
| GSV Loop Volume    | 0.25 mL |
| Load Time          | 1.5 min |
| Inject Time        | 0.5 min |

# Valve 2

|                    |         |
|--------------------|---------|
| Gas Sampling Valve | Unknown |
| GSV Loop Volume    | 0.25 mL |
| Load Time          | 1.5 min |
| Inject Time        | 0.5 min |

# Valve Box

|        |    |        |
|--------|----|--------|
| Heater | On | 150 °C |
|--------|----|--------|

# Signals

|                         |         |
|-------------------------|---------|
| Signal #1: Front Signal | Save On |
|                         | 20 Hz   |

|                      |          |
|----------------------|----------|
| Signal #2: Test Plot | Save Off |
|                      | 50 Hz    |

|                        |         |
|------------------------|---------|
| Signal #3: Back Signal | Save On |
|                        | 20 Hz   |

|                      |          |
|----------------------|----------|
| Signal #4: Test Plot | Save Off |
|                      | 50 Hz    |

=====

Agilent 7890A

=====

Oven  
Equilibration Time 0.3 min  
Max Temperature 200 degrees C  
Slow Fan Disabled  
Oven Program On  
    35 °C for 2.2 min  
#1 then 15 °C/min to 70 °C for 0.07 min  
#2 then 30 °C/min to 180 °C for 10 min  
Run Time 18.27 min

Sample Overlap  
Sample overlap is not enabled

Front SS Inlet H2  
Mode Split  
Heater On 200 °C  
Pressure On 5.1931 psi  
Total Flow On 15.6 mL/min  
Septum Purge Flow On 3 mL/min  
Gas Saver Off  
Split Ratio 5 :1  
Split Flow 10.5 mL/min

Back SS Inlet H2  
Mode Split  
Heater On 200 °C  
Pressure On 14.935 psi  
Total Flow On 25.632 mL/min  
Septum Purge Flow On 3 mL/min  
Gas Saver Off  
Split Ratio 2 :1  
Split Flow 15.088 mL/min

Column #1  
Restek 10198Rtx-1 S/N 1452467  
280 °C: 30 m x 320 µm x 4 µm  
In: Front SS Inlet H2  
Out: Front Detector FID

(Initial) 35 °C  
Pressure 5.1931 psi  
Flow 2.1 mL/min  
Average Velocity 39.91 cm/sec  
Holdup Time 1.2528 min  
Flow Program On  
    2.1 mL/min for 0 min  
Run Time 18.27 min

Column #2  
Restek 19757Rt-Alumina BOND/Na2SO4  
200 °C: 30 m x 320 µm x 5 µm  
In: Back SS Inlet H2  
Out: Back Detector FID

(Initial) 35 °C  
Pressure 14.935 psi  
Flow 7.5439 mL/min  
Average Velocity 110 cm/sec  
Holdup Time 0.45455 min  
Flow Program On

514

Modified on: 8/14/2017 at 12:18:56 PM

7.5439 mL/min for 0 min

Run Time 18.27 min

# Front Detector FID

|                    |     |            |
|--------------------|-----|------------|
| Heater             | On  | 300 °C     |
| H2 Flow            | On  | 50 mL/min  |
| Air Flow           | On  | 450 mL/min |
| Makeup Flow        | On  | 35 mL/min  |
| Const Col + Makeup | Off |            |
| Flame              | On  |            |
| Electrometer       | On  |            |

# Back Detector FID

|                    |     |            |
|--------------------|-----|------------|
| Heater             | On  | 200 °C     |
| H2 Flow            | On  | 50 mL/min  |
| Air Flow           | On  | 450 mL/min |
| Makeup Flow        | On  | 35 mL/min  |
| Const Col + Makeup | Off |            |
| Flame              | On  |            |
| Electrometer       | On  |            |

# Valve 1

|                    |         |
|--------------------|---------|
| Gas Sampling Valve | Unknown |
| GSV Loop Volume    | 0.25 mL |
| Load Time          | 1.5 min |
| Inject Time        | 0.5 min |

# Valve 2

|                    |         |
|--------------------|---------|
| Gas Sampling Valve | Unknown |
| GSV Loop Volume    | 0.25 mL |
| Load Time          | 1.5 min |
| Inject Time        | 0.5 min |

# Valve Box

|        |    |        |
|--------|----|--------|
| Heater | On | 150 °C |
|--------|----|--------|

# Signals

|                         |         |
|-------------------------|---------|
| Signal #1: Front Signal | Save On |
|                         | 20 Hz   |

|                      |          |
|----------------------|----------|
| Signal #2: Test Plot | Save Off |
|                      | 50 Hz    |

|                        |         |
|------------------------|---------|
| Signal #3: Back Signal | Save On |
|                        | 20 Hz   |

|                      |          |
|----------------------|----------|
| Signal #4: Test Plot | Save Off |
|                      | 50 Hz    |



**This Is The Last Page  
Of This Report.**

**APPENDIX III-E**  
**Calibration Gas Cylinder Certificates**

# CERTIFICATE OF ANALYSIS

## Grade of Product: EPA Protocol

|                  |                         |                     |                 |
|------------------|-------------------------|---------------------|-----------------|
| Part Number:     | E03NI79E15A0088         | Reference Number:   | 122-401268406-1 |
| Cylinder Number: | EB0066823               | Cylinder Volume:    | 151.0 CF        |
| Laboratory:      | 124 - Durham (SAP) - NC | Cylinder Pressure:  | 2015 PSIG       |
| PGVP Number:     | B22018                  | Valve Outlet:       | 590             |
| Gas Code:        | CO2,O2,BALN             | Certification Date: | Aug 06, 2018    |

**Expiration Date: Aug 06, 2026**

Certification performed in accordance with "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (May 2012)" document EPA 600/R-12/531, using the assay procedures listed. Analytical Methodology does not require correction for analytical interference. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a volume/volume basis unless otherwise noted.

Do Not Use This Cylinder below 100 psig, i.e. 0.7 megapascals.

| ANALYTICAL RESULTS |                         |                      |                 |                            |             |
|--------------------|-------------------------|----------------------|-----------------|----------------------------|-------------|
| Component          | Requested Concentration | Actual Concentration | Protocol Method | Total Relative Uncertainty | Assay Dates |
| CARBON DIOXIDE     | 10.00 %                 | 9.952 %              | G1              | +/- 0.6% NIST Traceable    | 08/06/2018  |
| OXYGEN             | 11.00 %                 | 11.05 %              | G1              | +/- 0.4% NIST Traceable    | 08/06/2018  |
| NITROGEN           | Balance                 |                      |                 |                            |             |

| CALIBRATION STANDARDS |          |             |                                  |             |                 |
|-----------------------|----------|-------------|----------------------------------|-------------|-----------------|
| Type                  | Lot ID   | Cylinder No | Concentration                    | Uncertainty | Expiration Date |
| NTRM                  | 13060638 | CC414571    | 13.359 % CARBON DIOXIDE/NITROGEN | +/- 0.6%    | May 09, 2019    |
| NTRM                  | 09060212 | CC262381    | 9.961 % OXYGEN/NITROGEN          | +/- 0.3%    | Nov 08, 2018    |

| ANALYTICAL EQUIPMENT         |                               |                             |
|------------------------------|-------------------------------|-----------------------------|
| Instrument/Make/Model        | Analytical Principle          | Last Multipoint Calibration |
| Horiba VIA510 CO2 2L6YXWY0   | Nondispersive Infrared (NDIR) | Jul 25, 2018                |
| Horiba MPA510 O2 41499150042 | Paramagnetic                  | Jul 25, 2018                |

Triad Data Available Upon Request



*[Signature]*

Approved for Release





Praxair Distribution Mid-Atlantic  
One Steel Road East,  
Morrisville, PA 19067  
Tel: (800) 638-6360 Fax: (215) 736 5240  
PGVP ID: F32016

DocNumber: 000019256

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

### Customer & Order Information:

CHEROKEE INSTRUMENTS INC  
100 LOGAN COURT  
ANGIER NC 27501

Praxair Order Number: 86503230  
Customer P. O. Number: 14849  
Customer Reference Number:

Fill Date: 12/12/2016  
Part Number: NI CD1805ZE AS  
Lot Number: 301733347606  
Cylinder Style & Outlet: AS CGA 590  
Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

### Certified Concentration:

|                  |                |                         |
|------------------|----------------|-------------------------|
| Expiration Date: | 12/16/2024     | NIST Traceable          |
| Cylinder Number: | CC200302       | Analytical Uncertainty: |
| 18.20 %          | CARBON DIOXIDE | ± 0.4 %                 |
| 21.80 %          | OXYGEN         | ± 0.1 %                 |
| Balance          | NITROGEN       |                         |

Certification Information: Certification Date: 12/16/2016 Term: 96 Months Expiration Date: 12/16/2024

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Do Not Use this Standard if Pressure is less than 100 PSIG.

### Analytical Data: (R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

#### 1. Component: CARBON DIOXIDE

Requested Concentration: 18 %  
Certified Concentration: 18.20 %  
Instrument Used: SIEMENS ULTRAMAT 5E SN: D2-412  
Analytical Method: NON-DISPERSIVE INFRARED  
Last Multipoint Calibration: 12/7/2018

| First Analysis Data: |       | Date:            |        | 12/16/2016 |       |
|----------------------|-------|------------------|--------|------------|-------|
| Z:                   | 0     | R:               | 19.99  | C:         | 18.16 |
| Conc:                | 18.2  |                  |        |            |       |
| R:                   | 19.92 | Z:               | 0      | C:         | 18.16 |
| Conc:                | 18.2  |                  |        |            |       |
| Z:                   | 0     | C:               | 18.16  | R:         | 19.99 |
| Conc:                | 18.2  |                  |        |            |       |
| UOM:                 | %     | Mean Test Assay: | 18.2 % |            |       |

Reference Standard Type: GM15  
Ref. Std. Cylinder #: CC157638  
Ref. Std. Conc: 19.99 %  
Ref. Std. Traceable to SRM #: 2745a  
SRM Sample #: 9-7-34  
SRM Cylinder #: CAL016129

| Second Analysis Data: |   | Date:            |     |    |   |
|-----------------------|---|------------------|-----|----|---|
| Z:                    | 0 | R:               | 0   | C: | 0 |
| Conc:                 | 0 |                  |     |    |   |
| R:                    | 0 | Z:               | 0   | C: | 0 |
| Conc:                 | 0 |                  |     |    |   |
| Z:                    | 0 | C:               | 0   | R: | 0 |
| Conc:                 | 0 |                  |     |    |   |
| UOM:                  | % | Mean Test Assay: | 0 % |    |   |

#### 2. Component: OXYGEN

Requested Concentration: 21.75 %  
Certified Concentration: 21.80 %  
Instrument Used: SIEMENS OXYMAT 5F  
Analytical Method: PARAMAGNETIC  
Last Multipoint Calibration: 12/7/2018

| First Analysis Data: |       | Date:            |        | 12/16/2016 |       |
|----------------------|-------|------------------|--------|------------|-------|
| Z:                   | 0     | R:               | 21.32  | C:         | 21.8  |
| Conc:                | 21.8  |                  |        |            |       |
| R:                   | 21.32 | Z:               | 0      | C:         | 21.8  |
| Conc:                | 21.8  |                  |        |            |       |
| Z:                   | 0     | C:               | 21.8   | R:         | 21.32 |
| Conc:                | 21.8  |                  |        |            |       |
| UOM:                 | %     | Mean Test Assay: | 21.8 % |            |       |

Reference Standard Type: GM18  
Ref. Std. Cylinder #: CC8852  
Ref. Std. Conc: 21.32 %  
Ref. Std. Traceable to SRM #: 2858A  
SRM Sample #: 71-E-24  
SRM Cylinder #: FF18300

| Second Analysis Data: |   | Date:            |     |    |   |
|-----------------------|---|------------------|-----|----|---|
| Z:                    | 0 | R:               | 0   | C: | 0 |
| Conc:                 | 0 |                  |     |    |   |
| R:                    | 0 | Z:               | 0   | C: | 0 |
| Conc:                 | 0 |                  |     |    |   |
| Z:                    | 0 | C:               | 0   | R: | 0 |
| Conc:                 | 0 |                  |     |    |   |
| UOM:                  | % | Mean Test Assay: | 0 % |    |   |

Analyzed by:

Jessica Goodman

Certified by:

Jeff Gosner

Information contained herein has been prepared at your request by qualified experts within Praxair Distribution, Inc. While we believe that the information is accurate within the limits of the analytical methods employed and is complete to the extent of the specific analyses performed, we make no warranty or representation as to the suitability of the use of the information for any purpose. The information is offered with the understanding that any use of the information is at the sole discretion and risk of the user. In no event shall the liability of Praxair Distribution, Inc., arising out of the use of the information contained herein exceed the fee established for providing such information.



Praxair Distribution Mid-Atlantic  
One Steel Road East,  
Morrisville, PA 19067  
Tel: (800) 638-6360 Fax: (215) 736 5240  
PGVP ID: F32016

DocNumber: 000019320

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

### Customer & Order Information:

CHEROKEE INSTRUMENTS INC  
100 LOGAN COURT  
ANGIER NC 27501

Praxair Order Number: 86501794  
Customer P. O. Number: 14848  
Customer Reference Number:

Fill Date: 12/16/2016  
Part Number: NI CO4SME-AS  
Lot Number: 304613351805  
Cylinder Style & Outlet: AS CGA 350  
Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

### Certified Concentration:

|                  |                 |                         |
|------------------|-----------------|-------------------------|
| Expiration Date: | 12/21/2024      | NIST Traceable          |
| Cylinder Number: | LCCO-SA15768    | Analytical Uncertainty: |
| 46.1 ppm         | CARBON MONOXIDE | ± 0.5 %                 |
| Balance          | NITROGEN        |                         |

Certification Information: Certification Date: 12/21/2016 Term: 96 Months Expiration Date: 12/21/2024

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-800/R-12/531, using Procedure G1. Do Not Use this Standard if Pressure is less than 100 PSIG.

### Analytical Data: (R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

#### 1. Component: CARBON MONOXIDE

Requested Concentration: 45 ppm  
Certified Concentration: 46.1 ppm  
Instrument Used: HORIBA VIA-510, SN 577172041  
Analytical Method: NON-DISPERSIVE INFRARED  
Last Multipoint Calibration: 12/15/2016

| First Analysis Data: |      | Date:            |          | 12/21/2016 |      |
|----------------------|------|------------------|----------|------------|------|
| Z:                   | 0    | R:               | 75.2     | C:         | 46.2 |
| R:                   | 75.2 | Z:               | 0        | C:         | 46.2 |
| Z:                   | 0    | C:               | 46.2     | R:         | 75.2 |
| UOM:                 | PPM  | Mean Test Assay: | 46.1 PPM |            |      |

Analyzed by:

Jessica Goodman

Reference Standard Type: GMIS  
Ref. Std. Cylinder #: CC170310  
Ref. Std. Conc.: 75.2 PPM  
Ref. Std. Traceable to SRM #: 1679C  
SRM Sample #: 03-J-47  
SRM Cylinder #: CAL018062

| Second Analysis Data: |     | Date:            |       |    |   |
|-----------------------|-----|------------------|-------|----|---|
| Z:                    | 0   | R:               | 0     | C: | 0 |
| R:                    | 0   | Z:               | 0     | C: | 0 |
| Z:                    | 0   | C:               | 0     | R: | 0 |
| UOM:                  | PPM | Mean Test Assay: | 0 PPM |    |   |

Certified by:

Megha Patel





Praxair Distribution Mid-Atlantic  
One Steel Road East,  
Morrisville, PA 19067  
Tel: (800) 638-6360 Fax: (215) 736 5240  
PGVP ID: F32013

DocNumber: 000006513

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

### Customer & Order Information:

PDI WHSE RALEIGH  
2807 GRESHAM LAKE RD  
RALEIGH NC 276160

Praxair Order Number: 04602771  
Customer P. O. Number: 12593 99  
Customer Reference Number:

Fill Date: 11/15/2013  
Part Number: NI CO90ME-AS  
Lot Number: 304121319303  
Cylinder Style & Outlet: AS CGA 350  
Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

### Certified Concentration:

|                  |                 |                         |
|------------------|-----------------|-------------------------|
| Expiration Date: | 11/19/2021      | NIST Traceable          |
| Cylinder Number: | CC14366         | Analytical Uncertainty: |
| 89.5 ppm         | CARBON MONOXIDE | ± 1 %                   |
| Balance          | NITROGEN        |                         |

Certification Information: Certification Date: 11/19/2013 Term: 96 Months Expiration Date: 11/19/2021

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Do Not Use this Standard if Pressure is less than 100 PSIG.

### Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

#### 1. Component: CARBON MONOXIDE

Requested Concentration: 90 ppm  
Certified Concentration: 89.5 ppm  
Instrument Used: MKS 2031  
Analytical Method: FTIR  
Last Multipoint Calibration: 10/21/2013

|                                         |                  |            |
|-----------------------------------------|------------------|------------|
| First Analysis Data:                    | Date:            | 11/19/2013 |
| Z: 0.029 R: 504.54 C: 89.54 Conc: 89.42 |                  |            |
| R: 506.5 Z: -0.04 C: 89.55 Conc: 89.43  |                  |            |
| Z: -0.07 C: 89.79 R: 506.4 Conc: 89.67  |                  |            |
| UOM: PPM                                | Mean Test Assay: | 89.51 PPM  |

Analyzed by:

Jeff Gosner

#### Reference Standard Type:

Ref. Std. Cylinder #: SA2779  
Ref. Std. Conc: 505 PPM  
Ref. Std. Traceable to SRM #: 1680b  
SRM Sample #:  
SRM Cylinder #:

|                        |                  |       |
|------------------------|------------------|-------|
| Second Analysis Data:  | Date:            |       |
| Z: 0 R: 0 C: 0 Conc: 0 |                  |       |
| R: 0 Z: 0 C: 0 Conc: 0 |                  |       |
| Z: 0 C: 0 R: 0 Conc: 0 |                  |       |
| UOM: PPM               | Mean Test Assay: | 0 PPM |

Certified by:

Judith Imperial

DocNumber: 000015392

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

**Customer & Order Information:**

CHEROKEE INSTRUMENTS  
100 LOGAN COURT  
ANGIER NC 27501

Praxair Order Number: 70027764  
Customer P. O. Number:  
Customer Reference Number:

Fill Date: 1/29/2016  
Part Number: EV AIPR25 5MEAS  
Lot Number: 304322029605  
Cylinder Style & Outlet: AS CGA 590  
Cylinder Pressure & Volume: 2000 psig 140 cu. ft

**Certified Concentration:**

|                   |          |                         |
|-------------------|----------|-------------------------|
| Expiration Date:  | 2/2/2024 | NIST Traceable          |
| Cylinder Number:  | CC154735 | Analytical Uncertainty: |
| 25.74 ppm PROPANE | ± 0.8 %  |                         |
| Balance AIR       |          |                         |

**Certification Information:** Certification Date: 2/2/2016 Term: 96 Months Expiration Date: 2/2/2024

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Do Not Use this Standard if Pressure is less than 100 PSIG.

**Analytical Data:**

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

**1. Component: PROPANE**

Requested Concentration: 25.5 ppm  
Certified Concentration: 25.74 ppm  
Instrument Used: GOW MAC 600  
Analytical Method: Flame Ionization Detector  
Last Multipoint Calibration: 2/2/2016

|                      |                            |          |             |
|----------------------|----------------------------|----------|-------------|
| First Analysis Data: |                            | Date:    | 2/2/2016    |
| Z: 0                 | R: 30.1                    | C: 25.78 | Conc: 25.78 |
| R: 30.06             | Z: 0                       | C: 25.71 | Conc: 25.69 |
| Z: 0                 | C: 25.77                   | R: 30.05 | Conc: 25.75 |
| UOM: PPM             | Mean Test Assay: 25.74 PPM |          |             |

Analyzed by:

Jeff Gosner

Reference Standard Type: GMIS  
Ref. Std. Cylinder #: CC107531  
Ref. Std. Conc: 30.05 PPM  
Ref. Std. Traceable to SRM #: 1667b  
SRM Sample #: 83-I-52  
SRM Cylinder #: XF0040798

|                       |                        |       |         |
|-----------------------|------------------------|-------|---------|
| Second Analysis Data: |                        | Date: |         |
| Z: 0                  | R: 0                   | C: 0  | Conc: 0 |
| R: 0                  | Z: 0                   | C: 0  | Conc: 0 |
| Z: 0                  | C: 0                   | R: 0  | Conc: 0 |
| UOM: PPM              | Mean Test Assay: 0 PPM |       |         |

Certified by:

Judith Imperial





Praxair  
5700 South Alameda Street  
Los Angeles, CA 90058  
Tel: (323) 585-2154 Fax (714) 542-6689  
PGVPID: F22016

DocNumber: 000089651

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

### Customer & Order Information:

PXPKG RALEIGH NC HS  
2807 GRESHAM LAKES RD  
RALEIGH NC 27615

Praxair Order Number: 33652518  
Customer P. O. Number: 72163933-799700  
Customer Reference Number:

Fill Date: 2/3/2016  
Part Number: AI NX50ME-AS  
Lot Number: 109603402  
Cylinder Style & Outlet: AS CGA 660  
Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

### Certified Concentration:

|                  |                           |                         |
|------------------|---------------------------|-------------------------|
| Expiration Date: | 2/12/2019                 | NIST Traceable          |
| Cylinder Number: | CC266282                  | Analytical Uncertainty: |
| 50.2 ppm         | NITROGEN DIOXIDE (as NOx) | ± 1 %                   |
| Balance          | AIR                       |                         |

NO = 0.1 ppm

NO for Reference Only

Certification Information: Certification Date: 2/12/2016 Term: 36 Months Expiration Date: 2/12/2019

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Do Not Use this Standard if Pressure is less than 100 PSIG.

### Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

#### 1. Component: NITROGEN DIOXIDE (as NOx)

Requested Concentration: 50 ppm  
Certified Concentration: 50.2 ppm  
Instrument Used: Thermo Env. 42i-HL  
Analytical Method: Chemiluminescence  
Last Multipoint Calibration: 1/27/2015

Reference Standard Type: GMIS  
Ref Std. Cylinder #: CC308931  
Ref Std. Conc: 97.3 ppm  
Ref Std. Traceable to SRM #: 2660a  
SRM Sample #: 2660C-45  
SRM Cylinder #: CAL016162

First Analysis Date: Date: 2/5/2016  
Z: 0 R: 95.6 C: 49.3 Conc: 50.177  
R: 95.6 Z: 0 C: 49.5 Conc: 50.38  
Z: 0 C: 49.4 R: 95.6 Conc: 50.278  
UOM: ppm Mean Test Assay: 50.278 ppm

Second Analysis Date: Date: 2/12/2016  
Z: 0 R: 95.6 C: 49.2 Conc: 50.075  
R: 95.6 Z: 0 C: 49.4 Conc: 50.278  
Z: 0 C: 49.3 R: 95.6 Conc: 50.177  
UOM: ppm Mean Test Assay: 50.177 ppm

Analyzed by:

Henry Koung

Certified by:

Matthew Angerer



# CERTIFICATE OF ANALYSIS

## Grade of Product: EPA Protocol

|                  |                         |                     |                 |
|------------------|-------------------------|---------------------|-----------------|
| Part Number:     | E02NI99E15A0581         | Reference Number:   | 122-401180044-1 |
| Cylinder Number: | CC341990                | Cylinder Volume:    | 144.4 CF        |
| Laboratory:      | 124 - Durham (SAP) - NC | Cylinder Pressure:  | 2015 PSIG       |
| PGVP Number:     | B22018                  | Valve Outlet:       | 350             |
| Gas Code:        | PPN,BALN                | Certification Date: | Apr 17, 2018    |

**Expiration Date: Apr 17, 2026**

Certification performed in accordance with "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (May 2012)" document EPA 600/R-12/531, using the assay procedures listed. Analytical Methodology does not require correction for analytical interference. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a volume/volume basis unless otherwise noted.

Do Not Use This Cylinder below 100 psig, i.e. 0.7 megapascals.

### ANALYTICAL RESULTS

| Component | Requested Concentration | Actual Concentration | Protocol Method | Total Relative Uncertainty | Assay Dates |
|-----------|-------------------------|----------------------|-----------------|----------------------------|-------------|
| PROPANE   | 85.00 PPM               | 85.84 PPM            | G1              | +/- 0.8% NIST Traceable    | 04/17/2018  |
| NITROGEN  | Balance                 |                      |                 |                            |             |

### CALIBRATION STANDARDS

| Type | Lot ID  | Cylinder No | Concentration        | Uncertainty | Expiration Date |
|------|---------|-------------|----------------------|-------------|-----------------|
| NTRM | 0010613 | AAL18527    | 49.8 PPM PROPANE/AIR | +/- 0.6%    | May 23, 2018    |

### ANALYTICAL EQUIPMENT

| Instrument/Make/Model        | Analytical Principle | Last Multipoint Calibration |
|------------------------------|----------------------|-----------------------------|
| Nicolet 6700 AHR0801333 C3H8 | FTIR                 | Mar 22, 2018                |

Triad Data Available Upon Request



*Phil St.*  
Approved for Release



## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

**Customer & Order Information**

CHEROKEE INSTRUMENTS INC  
100 LOGAN COURT  
ANGIER NC 27501

Certificate Issuance Date: 02/12/2019

Praxair Order Number: 69497584

Part Number NI NO48MER-AS

Fill Date: 11/21/2018

Lot Number: 70088832502

Cylinder Style & Outlet: AS

CGA 550

Cylinder Pressure and Volume: 2000 psig 140 ft<sup>3</sup>

**Certified Concentration**

|                  |              |                      |
|------------------|--------------|----------------------|
| Expiration Date: | 12/13/2021   | NIST Traceable       |
| Cylinder Number: | SA6170       | Expanded Uncertainty |
| 49.8 ppm         | Nitric oxide | ± 0.9 %              |
| Balance          | Nitrogen     |                      |

**ProSpec EZ Cert**



**For Reference Only:** NOx 49.9 ppm

**Certification Information:**

Certification Date: 12/13/2018

Term: 36 Months

Expiration Date: 12/13/2021

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1.

Do Not Use this Standard if Pressure is less than 100 PSIG.

**Analytical Data:**

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

**1. Component:** Nitric oxide

Requested Concentration: 48 ppm

Certified Concentration: 49.8 ppm

Instrument Used: Thermo Electron 42i-LS S/N 1030645077

Analytical Method: Chemiluminescence

Last Multipoint Calibration: 11/27/2018

Reference Standard: Type / Cylinder #: NTRM / CG506530

Concentration / Uncertainty: 49.23 ppm ±0.853%

Expiration Date: 07/18/2022

Traceable to: SRM # / Sample # / Cylinder #: NTRM / 18070118 / NTRM CG506530

SRM Concentration / Uncertainty: 49.23 ppm / 0.42 ppm

SRM Expiration Date: 07/18/2022

| First Analysis Data: |      |    |      | Date                      | 12/04/2018 |
|----------------------|------|----|------|---------------------------|------------|
| Z:                   | 0    | R: | 49.2 | C:                        | 49.7       |
|                      |      |    |      | Conc:                     | 49.8       |
| R:                   | 49.1 | Z: | 0    | C:                        | 49.6       |
|                      |      |    |      | Conc:                     | 49.7       |
| Z:                   | 0    | C: | 49.7 | R:                        | 49.2       |
|                      |      |    |      | Conc:                     | 49.8       |
| UOM: ppm             |      |    |      | Mean Test Assay: 49.7 ppm |            |

| Second Analysis Data: |      |    |      | Date                      | 12/13/2018 |
|-----------------------|------|----|------|---------------------------|------------|
| Z:                    | 0    | R: | 49.3 | C:                        | 50         |
|                       |      |    |      | Conc:                     | 49.9       |
| R:                    | 49.3 | Z: | 0    | C:                        | 50         |
|                       |      |    |      | Conc:                     | 49.9       |
| Z:                    | 0    | C: | 50   | R:                        | 49.3       |
|                       |      |    |      | Conc:                     | 49.9       |
| UOM: ppm              |      |    |      | Mean Test Assay: 49.9 ppm |            |

Analyzed By

  
Analyst's Real

Certified By

  
Henry Kyoung





Praxair Distribution Mid-Atlantic  
One Steel Road East,  
Morrisville, PA 19067  
Tel: (800) 638-6360 Fax: (215) 736 5240  
PGVP ID: F32017

DocNumber: 000021376

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

### Customer & Order Information:

CHEROKEE INSTRUMENTS INC  
100 LOGAN COURT  
ANGIER NC 27501

Praxair Order Number: 92286180  
Customer P. O. Number: 0050001228  
Customer Reference Number:

Fill Date: 6/10/2017  
Part Number: NI NO90ME-A5  
Lot Number: 304513161704  
Cylinder Style & Outlet: AS CGA 680  
Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

### Certified Concentration:

|                  |              |                         |
|------------------|--------------|-------------------------|
| Expiration Date: | 6/21/2025    | NIST Traceable          |
| Cylinder Number: | CC200174     | Analytical Uncertainty: |
| 89.5 ppm         | NITRIC OXIDE | ± 0.5 %                 |
| Balance          | NITROGEN     |                         |

NOx = 90.0 ppm

NOx for Reference Only

Certification Information: Certification Date: 6/21/2017 Term: 96 Months Expiration Date: 6/21/2025

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Do Not Use this Standard if Pressure is less than 100 PSIG.

### Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

#### 1. Component: NITRIC OXIDE

Requested Concentration: 90 ppm  
Certified Concentration: 89.5 ppm  
Instrument Used: TECO MODEL 42i S/N: 0820017513  
Analytical Method: CHEMILUMINESCENCE  
Last Multipoint Calibration: 6/13/2017

|                               |                  |           |
|-------------------------------|------------------|-----------|
| First Analysis Date:          | Date:            | 6/14/2017 |
| Z: 0 R: 95 C: 89.5 Conc: 89.5 |                  |           |
| R: 85 Z: 0 C: 89.4 Conc: 89.4 |                  |           |
| Z: 0 C: 89.4 R: 95 Conc: 89.4 |                  |           |
| UOM: PPM                      | Mean Test Assay: | 89.4 PPM  |

Reference Standard Type: GMS  
Ref. Std. Cylinder #: CC352709  
Ref. Std. Conc: 95.0 PPM  
Ref. Std. Traceable to SRM #: 16848  
SRM Sample #: 44-T-48  
SRM Cylinder #: FF9239

|                               |                  |           |
|-------------------------------|------------------|-----------|
| Second Analysis Date:         | Date:            | 6/21/2017 |
| Z: 0 R: 95 C: 90 Conc: 89.7   |                  |           |
| R: 85.4 Z: 0 C: 80 Conc: 89.7 |                  |           |
| Z: 0 C: 90 R: 95.4 Conc: 89.7 |                  |           |
| UOM: PPM                      | Mean Test Assay: | 89.7 PPM  |

Analyzed by:

Jessica Goodman

Certified by:

Megha Patel

Information contained herein has been prepared at your request by qualified experts within Praxair Distribution, Inc. While we believe that the information is accurate within the limits of the analytical methods employed and is complete to the extent of the specific analyses performed, we make no warranty or representation as to the suitability of the use of the information for any purpose. The information is offered with the understanding that any use of the information is at the sole discretion and risk of the user. In no event shall the liability of Praxair Distribution, Inc., arising out of the use of the information contained herein exceed the fee established for providing such information.

**APPENDIX III-F**  
**Sampling Equipment Calibration Sheets**

**APEX INSTRUMENTS METHOD 5 PRE-TEST CONSOLE CALIBRATION**  
**USING CALIBRATED CRITICAL ORIFICES**  
**5-POINT ENGLISH UNITS**

| Meter Console Information |        |
|---------------------------|--------|
| Console Model Number      | 522    |
| Console Serial Number     | 909033 |
| DGM Model Number          | RW 110 |
| DGM Serial Number         | 972787 |

| Calibration Conditions                   |      |          |       |
|------------------------------------------|------|----------|-------|
| Date                                     | Time | 02/14/19 | 13:50 |
| Barometric Pressure                      |      | 29.61    | in Hg |
| Theoretical Critical Vacuum <sup>1</sup> |      | 13.98    | in Hg |
| Calibration Technician                   |      | JBG      |       |

| Factors/Conversions |        |          |
|---------------------|--------|----------|
| Std Temp            | 528    | °R       |
| Std Press           | 29.92  | in Hg    |
| K <sub>1</sub>      | 17.647 | oR/in Hg |

<sup>1</sup>For valid test results, the Actual Vacuum should be 1 to 2 in. Hg greater than the Theoretical Critical Vacuum shown above.

<sup>2</sup>The Critical Orifice Coefficient, K', must be entered in English units, (ft<sup>3</sup>•R<sup>1/2</sup>)/(in.Hg•min).

| Calibration Data |                     |                   |                   |                        |                      |                  |                        |                     |                     |                  |
|------------------|---------------------|-------------------|-------------------|------------------------|----------------------|------------------|------------------------|---------------------|---------------------|------------------|
| Run Time         | Metering Console    |                   |                   |                        | Critical Orifice     |                  |                        |                     |                     |                  |
| Elapsed          | DGM Orifice<br>ΔH   | Volume<br>Initial | Volume<br>Final   | Outlet Temp<br>Initial | Outlet Temp<br>Final | Serial<br>Number | Coefficient            | Amb Temp<br>Initial | Amb Temp<br>Final   | Actual<br>Vacuum |
| (θ)              | (P <sub>m</sub> )   | (V <sub>m</sub> ) | (V <sub>m</sub> ) | (t <sub>m</sub> )      | (t <sub>m</sub> )    |                  | K'                     | (t <sub>amb</sub> ) | (t <sub>amb</sub> ) |                  |
| min              | in H <sub>2</sub> O | cubic feet        | cubic feet        | °F                     | °F                   |                  | see above <sup>2</sup> | °F                  | °F                  | in Hg            |
| 18.50            | 0.33                | 187.000           | 192.865           | 64                     | 65                   | FO 40            | 0.2380                 | 66                  | 65                  | 19.0             |
| 10.50            | 0.69                | 200.400           | 205.253           | 66                     | 66                   | FO 48            | 0.3488                 | 66                  | 67                  | 17.0             |
| 11.50            | 1.20                | 193.200           | 200.215           | 65                     | 66                   | FO 55            | 0.4594                 | 65                  | 66                  | 17.0             |
| 8.00             | 2.00                | 205.600           | 211.894           | 66                     | 67                   | FO 63            | 0.5906                 | 67                  | 70                  | 15.0             |
| 9.00             | 3.60                | 212.200           | 221.692           | 67                     | 67                   | FO 73            | 0.8063                 | 70                  | 68                  | 14.0             |

| Standardized Data      |                        |                        |                        | Results            |           |                              |                     |             |
|------------------------|------------------------|------------------------|------------------------|--------------------|-----------|------------------------------|---------------------|-------------|
| Dry Gas Meter          |                        | Critical Orifice       |                        | Calibration Factor |           | Dry Gas Meter                |                     | ΔH @        |
|                        |                        |                        |                        | Value              | Variation | Flowrate                     | Flowrate            |             |
| (V <sub>m(Std)</sub> ) | (Q <sub>m(Std)</sub> ) | (V <sub>C(Std)</sub> ) | (Q <sub>C(Std)</sub> ) | (Y)                | (ΔY)      | Std & Corr                   | 0.75 SCFM           | Variation   |
| cubic feet             | cfm                    | cubic feet             | cfm                    |                    |           | (Q <sub>m(Std)(Corr)</sub> ) | (ΔH@)               | (ΔΔH@)      |
|                        |                        |                        |                        |                    |           | cfm                          | in H <sub>2</sub> O |             |
| 5.848                  | 0.316                  | 5.687                  | 0.307                  | 0.9725             | -0.003    | 0.307                        | 1.962               | 0.033       |
| 4.829                  | 0.460                  | 4.726                  | 0.450                  | 0.9786             | 0.003     | 0.450                        | 1.911               | -0.017      |
| 6.996                  | 0.608                  | 6.824                  | 0.593                  | 0.9754             | -0.001    | 0.593                        | 1.919               | -0.009      |
| 6.278                  | 0.785                  | 6.086                  | 0.761                  | 0.9694             | -0.007    | 0.761                        | 1.950               | 0.022       |
| 9.496                  | 1.055                  | 9.342                  | 1.038                  | 0.9838             | 0.008     | 1.038                        | 1.898               | -0.030      |
|                        |                        |                        |                        | 0.9760             | Y Average |                              | 1.928               | ΔH@ Average |

Note: For Calibration Factor Y, the ratio of the reading of the calibration meter to the dry gas meter, acceptable tolerance of individual values from the average is +/-0.02.

I certify that the above Dry Gas Meter was calibrated in accordance with USEPA Methods, CFR Title 40, Part 60, Appendix A-3, Method 5, 16.2.3

Signature: Jonas Gilbert

Date: 2/14/19

**METHOD 5 POST-TEST CONSOLE CALIBRATION USING CALIBRATED CRITICAL ORIFICES**  
**3-POINT ENGLISH UNITS**

| Meter Console Information |        |
|---------------------------|--------|
| Console Model Number      | 522    |
| Console Serial Number     | 909033 |
| DGM Model Number          | RW 110 |
| DGM Serial Number         | 328893 |

| Calibration Conditions                   |      |          |       |
|------------------------------------------|------|----------|-------|
| Date                                     | Time | 03/19/19 | 10:05 |
| Barometric Pressure                      |      | 30.6     | in Hg |
| Theoretical Critical Vacuum <sup>1</sup> |      | 14.4     | in Hg |
| Calibration Technician                   |      | JBG      |       |

| Factors/Conversions |        |          |
|---------------------|--------|----------|
| Std Temp            | 528    | °R       |
| Std Press           | 29.92  | in Hg    |
| K <sub>1</sub>      | 17.647 | oR/in Hg |

<sup>1</sup>For valid test results, the Actual Vacuum should be 1 to 2 in. Hg greater than the Theoretical Critical Vacuum shown above.

<sup>2</sup>The Critical Orifice Coefficient, K', must be entered in English units, (ft<sup>3</sup>•oR<sup>1/2</sup>)/(in.Hg•min).

| Calibration Data |                     |                   |                     |                        |                      |                  |             |                     |                     |                  |
|------------------|---------------------|-------------------|---------------------|------------------------|----------------------|------------------|-------------|---------------------|---------------------|------------------|
| Run Time         | Metering Console    |                   |                     |                        | Critical Orifice     |                  |             |                     |                     |                  |
| Elapsed          | DGM Orifice<br>ΔH   | Volume<br>Initial | Volume<br>Final     | Outlet Temp<br>Initial | Outlet Temp<br>Final | Serial<br>Number | Coefficient | Amb Temp<br>Initial | Amb Temp<br>Final   | Actual<br>Vacuum |
| (θ)              | (P <sub>m</sub> )   | (V <sub>m</sub> ) | (V <sub>net</sub> ) | (t <sub>m</sub> )      | (t <sub>net</sub> )  |                  | K'          | (t <sub>amb</sub> ) | (t <sub>amb</sub> ) | in. Hg           |
| min              | in H <sub>2</sub> O | cubic feet        | cubic feet          | °F                     | °F                   | FO               |             | °F                  | °F                  |                  |
| 7.0              | 2.00                | 911.50            | 916.982             | 58                     | 68                   | FO-63            | 0.5906      | 63                  | 63                  | 20.00            |
| 13.0             | 2.00                | 916.982           | 927.173             | 60                     | 68                   | FO-63            | 0.5906      | 63                  | 65                  | 20.00            |
| 9.0              | 2.00                | 927.173           | 934.257             | 63                     | 68                   | FO-63            | 0.5906      | 65                  | 65                  | 20.00            |

| Results                |                         |                              |                         |                    |           |            |                     |             |
|------------------------|-------------------------|------------------------------|-------------------------|--------------------|-----------|------------|---------------------|-------------|
| Standardized Data      |                         |                              |                         | Dry Gas Meter      |           |            |                     |             |
| Dry Gas Meter          |                         | Critical Orifice             |                         | Calibration Factor |           | Flowrate   | 0.3488              |             |
| (V <sub>m(std)</sub> ) | (Q <sub>cr(std)</sub> ) | (V <sub>cr(std)</sub> )      | (Q <sub>cr(std)</sub> ) | Value              | Variation | Std & Corr | 0.75 SCFM           | Variation   |
| (Y)                    | (ΔY)                    | (Q <sub>m(std)(corr)</sub> ) | (ΔH@)                   | (ΔΔH@)             |           |            |                     |             |
| cubic feet             | cfm                     | cubic feet                   | cfm                     |                    |           | cfm        | in H <sub>2</sub> O |             |
| 5.687                  | 0.812                   | 5.645                        | 0.806                   | 0.993              | 0.000     | 0.806      | 1.805               | 0.002       |
| 10.553                 | 0.812                   | 10.477                       | 0.806                   | 0.993              | 0.001     | 0.806      | 1.804               | 0.001       |
| 7.314                  | 0.813                   | 7.248                        | 0.805                   | 0.991              | -0.001    | 0.805      | 1.801               | -0.002      |
| Pretest Gamma          | 0.9760                  | % Deviation                  | 1.7                     | 0.992              | Y Average |            | 1.803               | ΔH@ Average |

Note: For Calibration Factor Y, the ratio of the reading of the calibration meter to the dry gas meter, acceptable tolerance of individual values from the average is ±0.02.

I certify that the above Dry Gas Meter was calibrated in accordance with USEPA Methods, CFR Title 40, Part 60, Appendix A-3, Method 5, 16.2.3

Signature Elias Gilbert

Date 3/19/2019

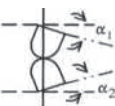
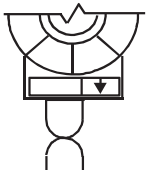


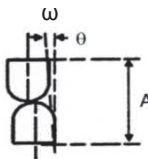
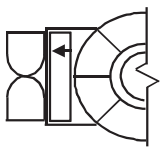
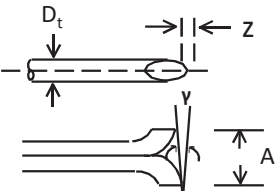
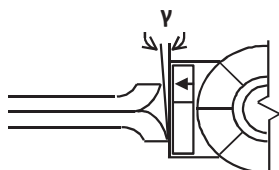
## Type S Pitot Tube Inspection

### GENERAL INFORMATION

|          |           |                   |      |
|----------|-----------|-------------------|------|
| Probe ID | 4A        | Personnel         | EBG  |
| Date     | 3/19/2019 | Coefficient Value | 0.84 |

### PITOT TUBE INSPECTION

|                                       |     |
|---------------------------------------|-----|
| Pitot Tube assembly level? (yes/no)   | yes |
| Pitot Tube obstruction? (yes/no)      | no  |
| Pitot Tube openings damaged? (yes/no) | no  |

|                                                                                     |                                                                                     |                                                            |        |                                             |
|-------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|------------------------------------------------------------|--------|---------------------------------------------|
|    |    | $\alpha_1$                                                 | 0      | $\leq \pm 10^\circ$                         |
|                                                                                     |                                                                                     | $\alpha_2$                                                 | 2      | $\leq \pm 10^\circ$                         |
|   |   | $\beta_1$                                                  | -1     | $\leq \pm 5^\circ$                          |
|                                                                                     |                                                                                     | $\beta_2$                                                  | 0      | $\leq \pm 5^\circ$                          |
|  |  | $\gamma$                                                   | 0.0087 |                                             |
|                                                                                     |                                                                                     | $\theta$                                                   | 0.0524 |                                             |
|                                                                                     |                                                                                     | $z = A \tan (\gamma)$                                      | 0.0200 | $\leq \pm \frac{1}{8}"$                     |
|                                                                                     |                                                                                     | $\omega = A \tan (\theta)$                                 | 0.0475 | $\leq \pm \frac{1}{32}"$                    |
|                                                                                     |                                                                                     | $D_t$                                                      | 0.375  |                                             |
|                                                                                     |                                                                                     | $(\frac{3}{16}" < D_t < \frac{3}{8}" \text{ Recommended})$ |        |                                             |
|  |  | A                                                          | 0.906  |                                             |
|                                                                                     |                                                                                     | $P_A$                                                      | 1.208  |                                             |
|                                                                                     |                                                                                     | $P_B$                                                      |        | $(1.05 < P/D_t < 1.50 \text{ Recommended})$ |

### STACK THERMOCOUPLE CALIBRATION

|           |                |         |      |
|-----------|----------------|---------|------|
| Ref. Type | Hg Thermometer | Ref. ID | Hg-1 |
|-----------|----------------|---------|------|

| Source                       | Ref., °F | Stack TC, °F | Abs. Diff., °F |
|------------------------------|----------|--------------|----------------|
| Ice bath                     | 32       | 32           | 0              |
| Ambient                      | 67       | 67           | 0              |
| Hot Plate                    | 232      | 231          | 1              |
| Maximum Temp. Difference, °F |          |              | 1              |

## Type S Pitot Tube Inspection

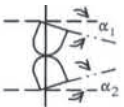
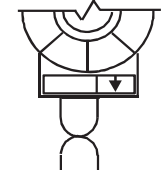
### GENERAL INFORMATION

|          |           |                   |      |
|----------|-----------|-------------------|------|
| Probe ID | 4B        | Personnel         | EJG  |
| Date     | 3/19/2019 | Coefficient Value | 0.84 |

### PITOT TUBE INSPECTION


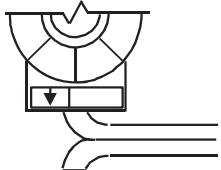
|                                       |     |
|---------------------------------------|-----|
| Pitot Tube assembly level? (yes/no)   | yes |
| Pitot Tube obstruction? (yes/no)      | no  |
| Pitot Tube openings damaged? (yes/no) | no  |

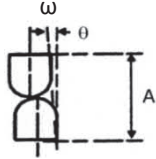
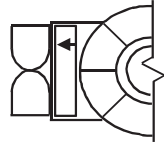
|            |   |                     |
|------------|---|---------------------|
| $\alpha_1$ | 1 | $\leq \pm 10^\circ$ |
| $\alpha_2$ | 0 | $\leq \pm 10^\circ$ |

|           |   |                    |
|-----------|---|--------------------|
| $\beta_1$ | 1 | $\leq \pm 5^\circ$ |
| $\beta_2$ | 2 | $\leq \pm 5^\circ$ |

|          |   |  |
|----------|---|--|
| $\gamma$ | 0 |  |
| $\theta$ | 3 |  |

$z = A \tan (\gamma)$

$\omega = A \tan (\theta)$

|             |                           |
|-------------|---------------------------|
| 0.00        | $\leq \pm \frac{1}{8}''$  |
| 0.049970818 | $\leq \pm \frac{1}{32}''$ |

$D_t$

|        |
|--------|
| 0.3735 |
|--------|

( $\frac{3}{16}'' < D_t < \frac{3}{8}''$  Recommended)

A

|        |
|--------|
| 0.9535 |
|--------|

$P_A$

$P_B$

|      |
|------|
| 1.28 |
|------|

( $1.05 < P/D_t < 1.50$  Recommended)



**APPENDIX III-G**  
**Process Data**

March 7, 2019 Pine 85% wt. processed

| Appendix III-G, Table 1. Process Data, RCO 1, March 7, 2019, Run 1 |              |              |              |              |               |         |
|--------------------------------------------------------------------|--------------|--------------|--------------|--------------|---------------|---------|
| Process Parameter                                                  | 9:10<br>a.m. | 9:25<br>a.m. | 9:40<br>a.m. | 9:55<br>a.m. | 10:10<br>a.m. | Average |
| Run Time 9:10-10:15 a.m.                                           |              |              |              |              |               |         |
| Short Tons/hour (wet basis)                                        | 41.7         | 41.7         | 41.7         | 41.7         | 41.7          | 41.7    |
| Production, ODT/hour                                               | 39.5         | 39.5         | 39.5         | 39.5         | 39.5          | 39.5    |
| Pellet Moisture Content, % weight                                  | 5.16         | 5.16         | 5.16         | 5.16         | 5.16          | 5.16    |
| RCO 1 Differential Pressure, in. w.c.                              | 1.1          | 1.2          | 1.2          | 1.2          | 1.2           | 1.2     |
| RCO CC 1 SP, °F                                                    | 750          | 750          | 750          | 750          | 750           | 750     |
| RCO CC 1 PV, °F                                                    | 948          | 950          | 947          | 946          | 944           | 947     |
| Cyclofilter 1 Diff. Pressure., in w.c.                             | 0.6          | 0.5          | 0.5          | 0.6          | 0.6           | 0.6     |
| Cyclofilter 2 Diff. Pressure, in w.c.                              | 0.5          | 0.5          | 0.4          | 0.2          | 0.2           | 0.4     |
| Cyclofilter 3 Diff. Pressure, in w.c.                              | 0.2          | 0.2          | 0.2          | 0.2          | 0.2           | 0.2     |

| Appendix III-G, Table 2. Process Data, RCO 1, March 7, 2019, Run 2 |               |               |               |               |               |         |
|--------------------------------------------------------------------|---------------|---------------|---------------|---------------|---------------|---------|
| Process Parameter                                                  | 11:08<br>a.m. | 11:23<br>a.m. | 11:38<br>a.m. | 11:53<br>a.m. | 12:08<br>p.m. | Average |
| Run Time 11:08 a.m.-12:22 p.m..                                    |               |               |               |               |               |         |
| Short Tons/hour (wet basis)                                        | 42.0          | 42.0          | 42.0          | 42.0          | 42.0          | 42.0    |
| Production, ODT/hour                                               | 40.3          | 40.3          | 40.3          | 40.3          | 40.3          | 40.3    |
| Pellet Moisture Content, % weight                                  | 4.69          | 4.69          | 4.69          | 4.69          | 4.69          | 4.7     |
| RCO 1 Differential Pressure, in. w.c.                              | 1.2           | 1.2           | 1.2           | 1.2           | 1.2           | 1.2     |
| RCO CC 1 SP, °F                                                    | 750           | 750           | 750           | 750           | 750           | 750     |
| RCO CC 1 PV, °F                                                    | 936           | 936           | 939           | 937           | 941           | 938     |
| Cyclofilter 1 Diff. Pressure, in w.c.                              | 0.7           | 0.7           | 0.6           | 0.6           | 0.7           | 0.7     |
| Cyclofilter 2 Diff. Pressure, in w.c.                              | 0.3           | 0.4           | 0.4           | 0.4           | 0.4           | 0.4     |
| Cyclofilter 3 Diff. Pressure, in w.c.                              | 0.2           | 0.2           | 0.2           | 0.2           | 0.2           | 0.2     |

| Appendix III-G, Table 2. Process Data, RCO 1, March 7, 2019, Run 3 |               |               |               |               |               |         |
|--------------------------------------------------------------------|---------------|---------------|---------------|---------------|---------------|---------|
| Process Parameter                                                  | 13:04<br>p.m. | 13:19<br>p.m. | 13:34<br>p.m. | 13:49<br>p.m. | 14:04<br>p.m. | Average |
| Run Time 13:04 p.m.-14:18 p.m.                                     |               |               |               |               |               |         |
| Short Tons/hour (wet basis)                                        | 42.3          | 42.3          | 42.3          | 42.3          | 42.3          | 42.3    |
| Production, ODT/hour                                               | 40.5          | 40.5          | 40.5          | 40.5          | 40.5          | 40.5    |
| Pellet Moisture Content, % weight                                  | 4.14          | 4.14          | 4.14          | 4.14          | 4.14          | 4.1     |
| RCO 1 Differential Pressure, in. w.c.                              | 1.2           | 1.2           | 1.2           | 1.2           | 1.2           | 1.2     |
| RCO CC 1 SP, °F                                                    | 750           | 750           | 750           | 750           | 750           | 750     |
| RCO CC 1 PV, °F                                                    | 937           | 941           | 936           | 944           | 944           | 940     |
| Cyclofilter 1 Diff. Pressure, in w.c.                              | 0.6           | 0.6           | 0.6           | 0.6           | 0.6           | 0.6     |
| Cyclofilter 2 Diff. Pressure, in w.c.                              | 0.3           | 0.3           | 0.4           | 0.3           | 0.3           | 0.3     |
| Cyclofilter 3 Diff. Pressure, in w.c.                              | 0.2           | 0.2           | 0.2           | 0.2           | 0.2           | 0.2     |



# Mount Rainier

National Park  
Washington

## ALERTS IN EFFECT

DISMISS 

### PARK CLOSURES

#### Nisqually Entrance is CLOSED due to hazardous winter road conditions, 1/10/24.

The gate at Nisqually Entrance is closed until further notice due to road conditions. Travel is discouraged. We will update as conditions evolve.

[More \(https://www.nps.gov/mora/planyourvisit/road-status.htm\)](https://www.nps.gov/mora/planyourvisit/road-status.htm)

#### Paradise Sledding Area is closed for the 2024 season.

The sledding area will not open this year due to limited staffing. The official Paradise Sledding Area is the safest and only location that sledding is permitted in Mount Rainier National Park.

[More \(https://www.nps.gov/mora/planyourvisit/winter-recreation.htm\)](https://www.nps.gov/mora/planyourvisit/winter-recreation.htm)

#### All park roads except the road to Longmire/Paradise are closed for the winter season.

Except for the Longmire/Paradise road in the southwest side of the park, all park roads are closed for the winter season, including SR410/Chinook Pass, SR123/Cayuse Pass, White River, Sunrise, Mowich Lake, Stevens Canyon, and Westside Roads.

[More \(https://www.nps.gov/mora/planyourvisit/road-status.htm\)](https://www.nps.gov/mora/planyourvisit/road-status.htm)

#### Paradise Road Status for 01/10/24: Closed

The gate to Paradise at Longmire is closed on Tuesdays & Wednesdays. Check back on Wed afternoon for expected status for the following Thursday. All vehicles, including 4WD and AWD, are required to carry tire chains Nov 1 - May 1.

[+ 4 more non-emergency alert notifications... \(https://www.nps.gov/mora/planyourvisit/conditions.htm\)](https://www.nps.gov/mora/planyourvisit/conditions.htm)

Dismiss

[View all alerts \(https://www.nps.gov/mora/planyourvisit/conditions.htm\)](https://www.nps.gov/mora/planyourvisit/conditions.htm)

# Air Quality

---

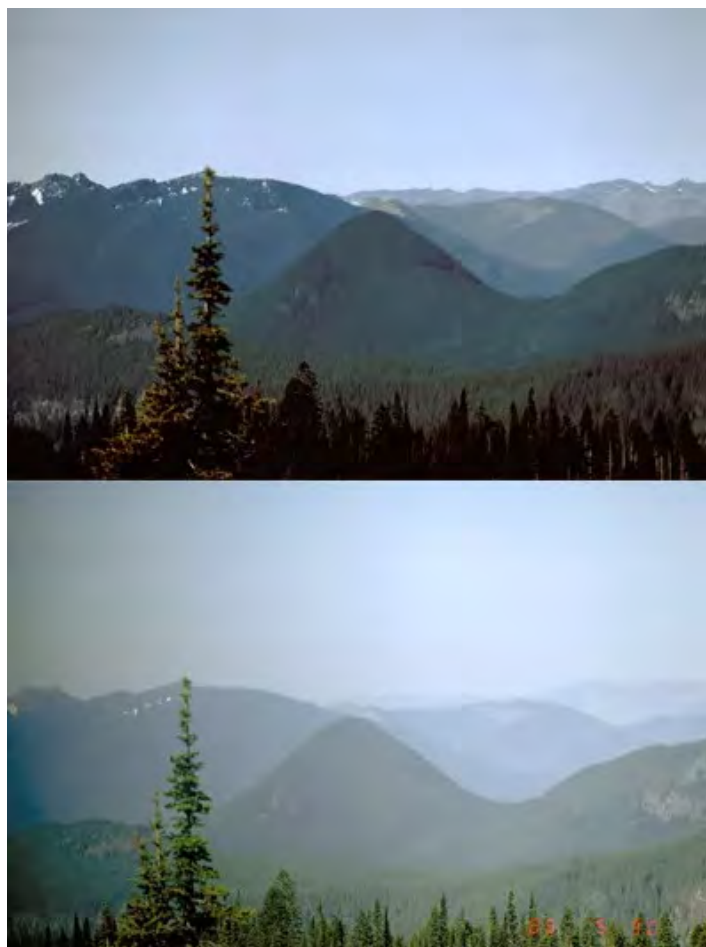
**Mount Rainier National Park is designated as a Class I air protection area.** National parks over 6,000 acres, like Mount Rainier, and national wilderness areas over 5,000 acres that were in existence before August 1977 are designated as Class I areas, as defined by an amendment to the Clean Air Act. In addition to Mount Rainier, some of the surrounding U.S. Forest Service wilderness areas are also designated as Class I areas. **Areas designated as Class I receive the highest level of air-quality protection.**

Consequently, Mount Rainier National Park staff are very involved in the National Park Service's comprehensive air resources management program, designed to assess air pollution impacts and protect air quality related values. Air quality related values include scenic vistas; sensitive natural ecosystem processes, functions, and components; and cultural resources.

The air resources management program at Mount Rainier includes monitoring, research, and regulatory interaction with local, state and federal agencies. Long-term monitoring programs include monitoring for gaseous pollutants such as ozone, visibility impairment, and atmospheric depositions. More information is available on the [IMPROVE \(Interagency Monitoring of Protected Visual Environments\)](http://vista.cira.colostate.edu/Datawarehouse/IMPROVE/Data/Photos/MORA/start.htm) (<http://vista.cira.colostate.edu/Datawarehouse/IMPROVE/Data/Photos/MORA/start.htm>) web site. In addition, there is an ongoing effort to determine the ecological effects of air pollutants on park resources.

The National Park Service (NPS) [Air Quality Research Program](https://www.nps.gov/subjects/air/air-monitoring.htm) (<https://www.nps.gov/subjects/air/air-monitoring.htm>) involves an extensive network of monitoring for pollution, visibility conditions, and biological effects in NPS units. At Mount Rainier the monitoring program has included:

- Use of cameras for measuring visibility.
- Fine particulate monitors for identifying the causes and sources of visibility impairment.
- Ozone monitors for establishing baseline conditions, assisting ozone effects research, measuring precipitation chemistry, and evaluating new pollution sources.



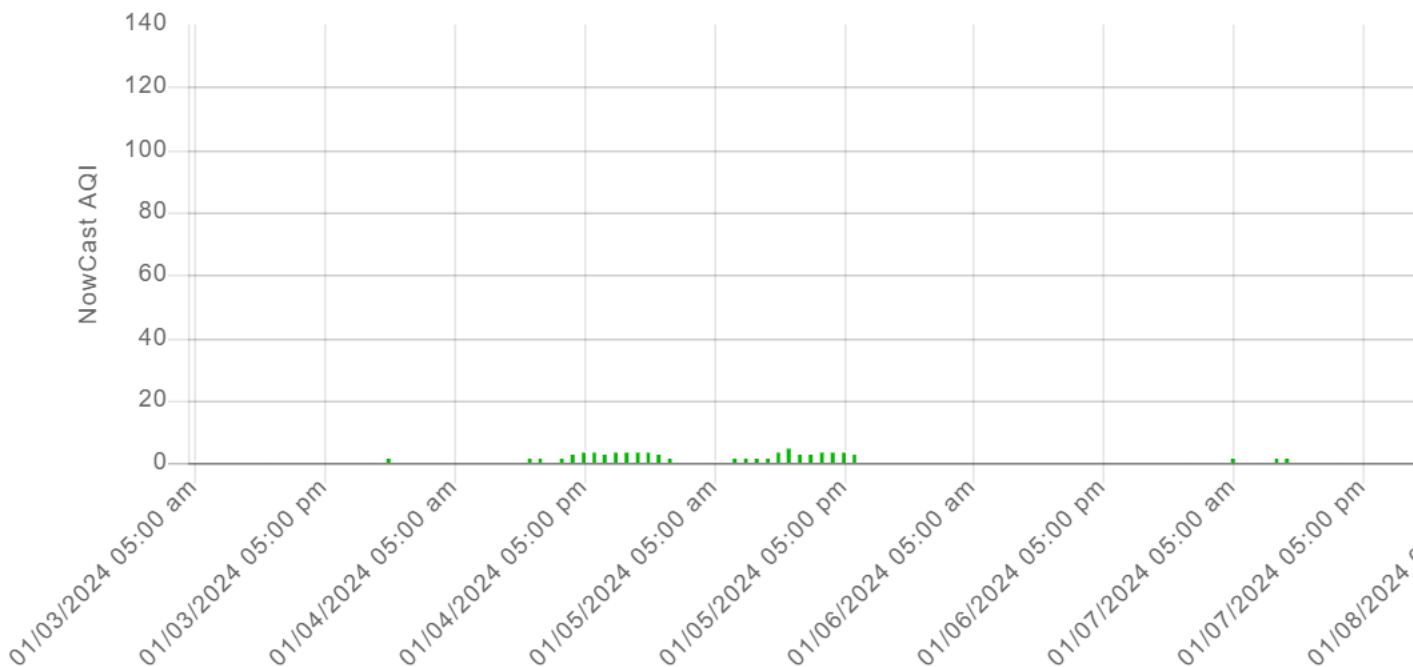
Two photos from an air quality camera in Paradise show different degrees of air clarity. The upper photo is from a clear day; the lower photo shows a day with higher levels of haze and air pollution.

*NPS Air Resources Photos*

# Current Air Quality in Paradise

This graph shows levels of particulate matter affecting air quality in Paradise on the south side of the park at 5,400 feet elevation.

**PARTICULATE MATTER (PM<sub>2.5</sub>) AT MOUNT RAINIER NATIONAL PARK  
JACKSON VISITOR'S CENTER**



**Particulate Matter (PM<sub>2.5</sub>) Nowcast Air Quality Index**

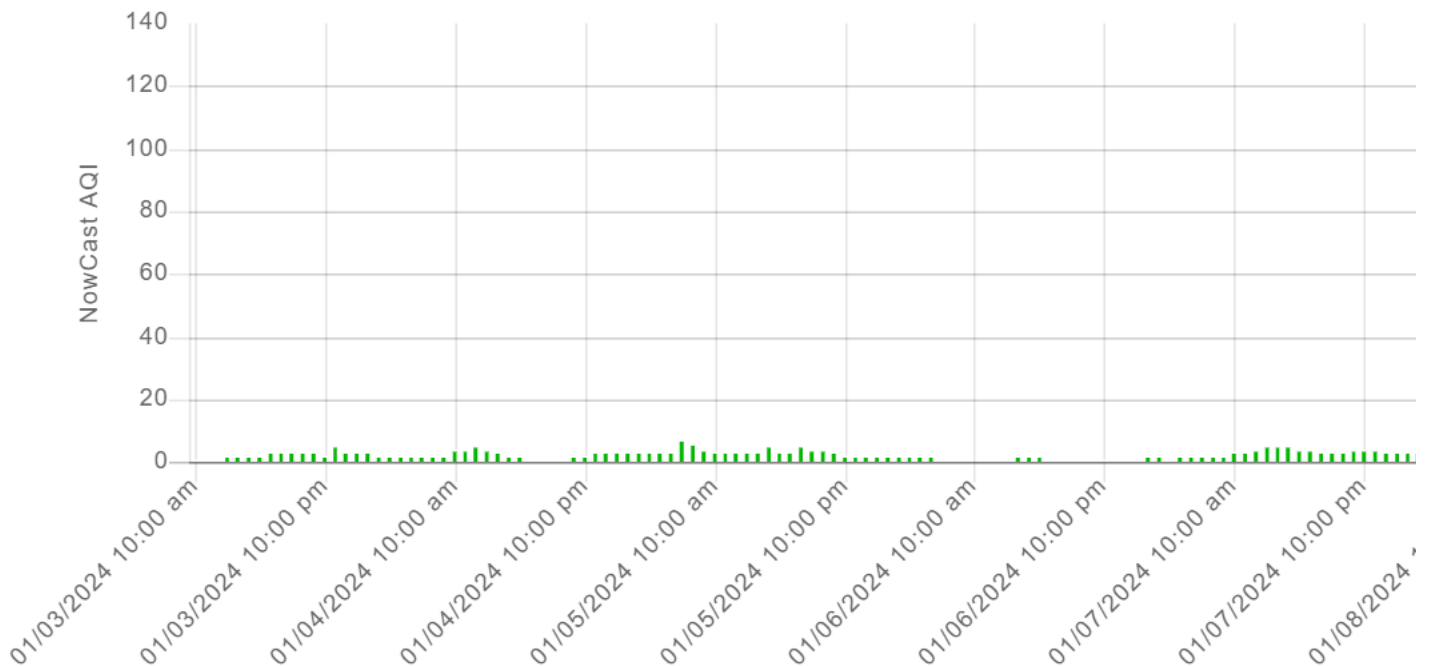
- Good
- Moderate
- Unhealthy for Sensitive Groups
- Unhealthy
- Very Unhealthy
- Hazardous
- No Data Available

[View More Data \(https://www.nps.gov/subjects/air/current-data.htm?site=mora&location=jackson-visitor's-center\)](https://www.nps.gov/subjects/air/current-data.htm?site=mora&location=jackson-visitor's-center)

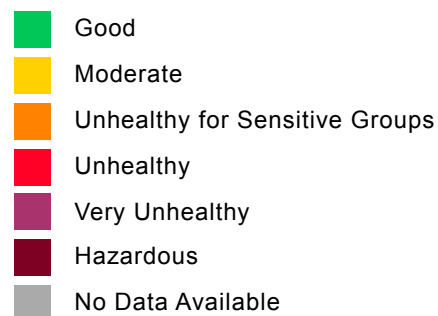
# Current Air Quality in Longmire

This graph shows levels of particulate matter affecting air quality in Longmire in the southwest corner of the park at 2,700 feet elevation.

## PARTICULATE MATTER (PM<sub>2.5</sub>) AT MOUNT RAINIER NATIONAL PARK LONGMIRE



### Particulate Matter (PM<sub>2.5</sub>) Nowcast Air Quality Index



[View More Data \(https://www.nps.gov/subjects/air/current-data.htm?site=mora&location=longmire\)](https://www.nps.gov/subjects/air/current-data.htm?site=mora&location=longmire)

### Ohanapecosh Air Quality - Down for the winter. Check back summer 2024!

The **Ohanapecosh air quality sensor** is located near the Ohanapecosh Campground and it is not uncommon to see poor air quality spikes on the graph above, especially in the evening when many visitors are having campfires. The valley that Ohanapecosh sits in is susceptible to inversion events that can trap the campfire smoke, keeping it nearer the ground and preventing dispersion. When that happens even campfires can effect the local air quality. Learn more about air quality monitoring at [How We Measure Smoke \(https://www.nps.gov/subjects/air/howwemeasure-smoke.htm\)](https://www.nps.gov/subjects/air/howwemeasure-smoke.htm).

## Air Quality Camera

A webcam has been installed at Paradise to show the effects of air pollution such as visibility impairment. The air quality webcam is part of the NPS air quality web camera network. Images are updated every 15 minutes. Visit the [NPS Air Resources](#)

(<https://www.nps.gov/subjects/air/index.htm>) site for more air quality data- including ozone, particulate matter, visual range, and weather conditions- that are updated hourly.

The digital camera is undergoing maintenance.  
The displayed picture is an archived photo.



WEBCAM

## Air Quality

Monitors the air quality over the Nisqually Valley from Paradise. Note that ozone and weather measurements are from the weather station at Paradise; visibility readings are from the weather station at Tahoma Woods, near Ashford, WA.

[View Webcam](#)

(<https://www.nps.gov/subjects/air/webcams.htm?site=mora>)

## Air Pollution at Mount Rainier

Mount Rainier National Park is located downwind of a number of urban and industrial areas to the northwest and southwest and is not isolated from the by-products of industrialization. Man-made air pollutants are transported long distances and have been detected through air quality monitoring programs. A number of stationary and mobile sources of pollutants affecting the park include a variety of sources in the Puget Sound region as far north as Vancouver, and as far south as Portland, Oregon. Pollutants traveling across the Pacific Ocean from Asia, and including pollutants from Europe and eastern North America that circumnavigate the globe, are deposited in lakes, streams and on land within the Cascade mountain range at high elevations.

## Visibility Impairment

Nearly two million visitors come to Mount Rainier each year to enjoy the scenery, but the view is often obscured by regional haze, especially in the summer. Haze is caused when sunlight encounters fine pollution particles in the air. Some light is absorbed by particles. Other light is scattered away before it reaches an observer. More pollutants result in more absorption and scattering of light, which reduce the clarity and color of what we see.

Fine particulates are measured at the [IMPROVE](#)

(<http://vista.cira.colostate.edu/Datawarehouse/IMPROVE/Data/Photos/MORA/start.htm>) (Interagency Monitoring of Protected Visual Environments) site at Tahoma Woods as well as in the park at Paradise. Photographic documentation of visibility has also been conducted at Paradise and Camp Muir, as well as at the Fremont and Tolmie Peak Fire Lookouts. Visibility impairment at Mount Rainier National Park is among the highest of all sites monitored in the west. The [NPS Visibility Monitoring Program](#) (<https://www.nps.gov/subjects/air/visibility.htm>) provides access to the most current data on visibility monitoring in the park.

### Wildfire Smoke

Increased [wildfire activity](https://www.nps.gov/mora/learn/news/fire.htm) (<https://www.nps.gov/mora/learn/news/fire.htm>), whether local or regional, is leading to increased smoke events. Smoke and PM<sub>2.5</sub> concentrations (small particles of ash and other material) in the air deteriorate air quality and have negative health effects. It's easy to see how smoke haze affects visibility, such as in the photos below from the air quality webcam at



Paradise from July 18, 2021, compared to August 2, 2021. However, it's also important to monitor air quality at the surface. Mount Rainier National Park is installing low-cost particle sensors to monitor PM2.5 levels at various locations in the park. Better air quality monitoring information will be used in the future to create a tiered list of management responses to poor air quality conditions.

#### **Air Quality & Wildfire Smoke Resources:**

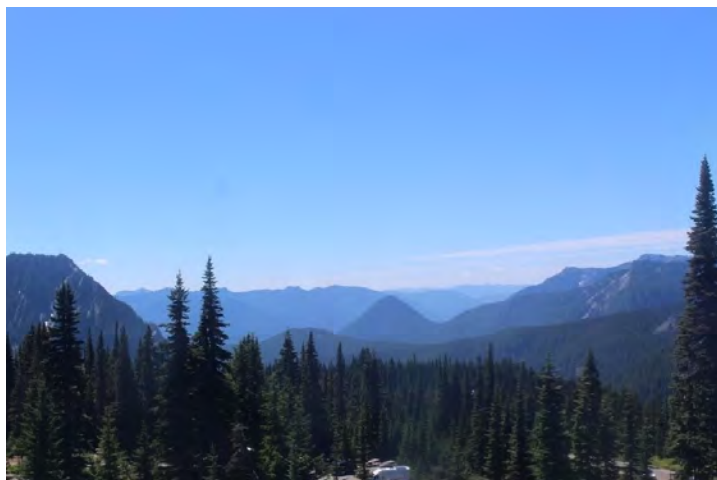
[Mount Rainier Webcams \(https://www.nps.gov/mora/learn/photosmultimedia/webcams.htm\)](https://www.nps.gov/mora/learn/photosmultimedia/webcams.htm)

[WA Smoke Information \(https://wasmoke.blogspot.com/\)](https://wasmoke.blogspot.com/)

[WA Air Monitoring Network Map \(https://enviwa.ecology.wa.gov/home/map\)](https://enviwa.ecology.wa.gov/home/map)

[AirNow Interactive Map \(https://gispub.epa.gov/airnow/\)](https://gispub.epa.gov/airnow/)

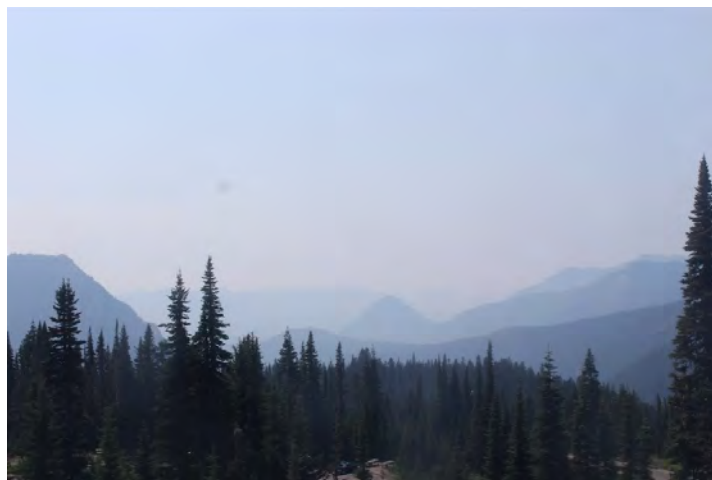
### **◀▶ Wildfire Smoke & Air Quality**



#### **Left image**

*View from the Mount Rainier air quality webcam on July 18, 2021 with good air quality.*

*Credit: NPS Webcam Still*



#### **Right image**

*View from the Mount Rainier air quality webcam on August 2, 2021 with poor air quality due to haze from wildfire smoke.*

*Credit: NPS Webcam Still*

View from the Mount Rainier air quality webcam on July 18, 2021, with good air quality compared to webcam view on August 2, 2021, with poor air quality due to haze from wildfire smoke.

## **Acid Deposition**

As precipitation water passes through the air it reacts with carbon dioxide, sulfur oxides, and nitrogen oxides to form acids. These compounds then fall to the Earth in either dry form (such as gas and particles) or wet form (such as rain, snow, and fog). The park's lakes and streams are very sensitive to acidic deposition because the soils and bedrock cannot neutralize acids well. Acid deposition impacts aquatic organisms and ecosystems as well as terrestrial life through direct contact and by changing the chemical balance in the soil and increasing the acidity of lakes and streams.

Water quality for approximately 20 of the major streams in the park have been inventoried along with approximately 48% of the park lakes. Of these, 10 stream sites have been documented as extremely sensitive, while lakes on the west and south sides of the park tend to be more sensitive. Spring snowmelt or late summer storms can cause highly acidic deposition events which can affect the aquatic ecology of these surface waters.



Mowich Lake  
NPS Photo

Studies conducted at Eunice Lake in the northwest corner of the park documented increased levels of sulfate during the spring, early summer snowmelt period. The chemistry of bulk precipitation collected at Paradise has been measured since 1986. Precipitation samples taken at Paradise have shown higher than background levels of sulfates. The chemistry of cloudwater samples taken at Paradise have shown some of the lowest levels of pH and highest levels of acidity of any taken in the state.

Mount Rainier National Park established a National Atmospheric Deposition Site within the park in 1999 to collect precipitation samples and analyze their chemistry. Data is available on the [National Atmospheric Deposition Program](http://nadp.isws.illinois.edu/data/sites/siteDetails.aspx?net=AMON&id=WA99) (<http://nadp.isws.illinois.edu/data/sites/siteDetails.aspx?net=AMON&id=WA99>) web site.

## Ozone

Plants can be sensitive to ozone at levels well under the national health standards for people. Lichens, mosses, and liverworts are often the most sensitive components of the vegetation within an ecosystem and can serve as early indicators of air pollution effects. Plants such as trees, shrubs, and herbaceous species are also injured by ozone which can damage leaves and needles and weaken the plants' ability to withstand disease and insect infestations.

Clean air is defined as ozone concentrations ranging from 15 to 30 ppb (parts per billion). Elevated ozone levels (above 80 ppb) were measured at Longmire in the southwest section of Mount Rainier National Park during the summers of 1987 and 1988. Values above 80 ppb were not uncommon at an ozone monitor at Carbon River in the northwest corner of the park during 1989 to 1992 and there were a few readings above 100 ppb. Similar values have been measured at Tahoma Woods, while ozone levels at Paradise have, on some days, been the highest recorded in the state.



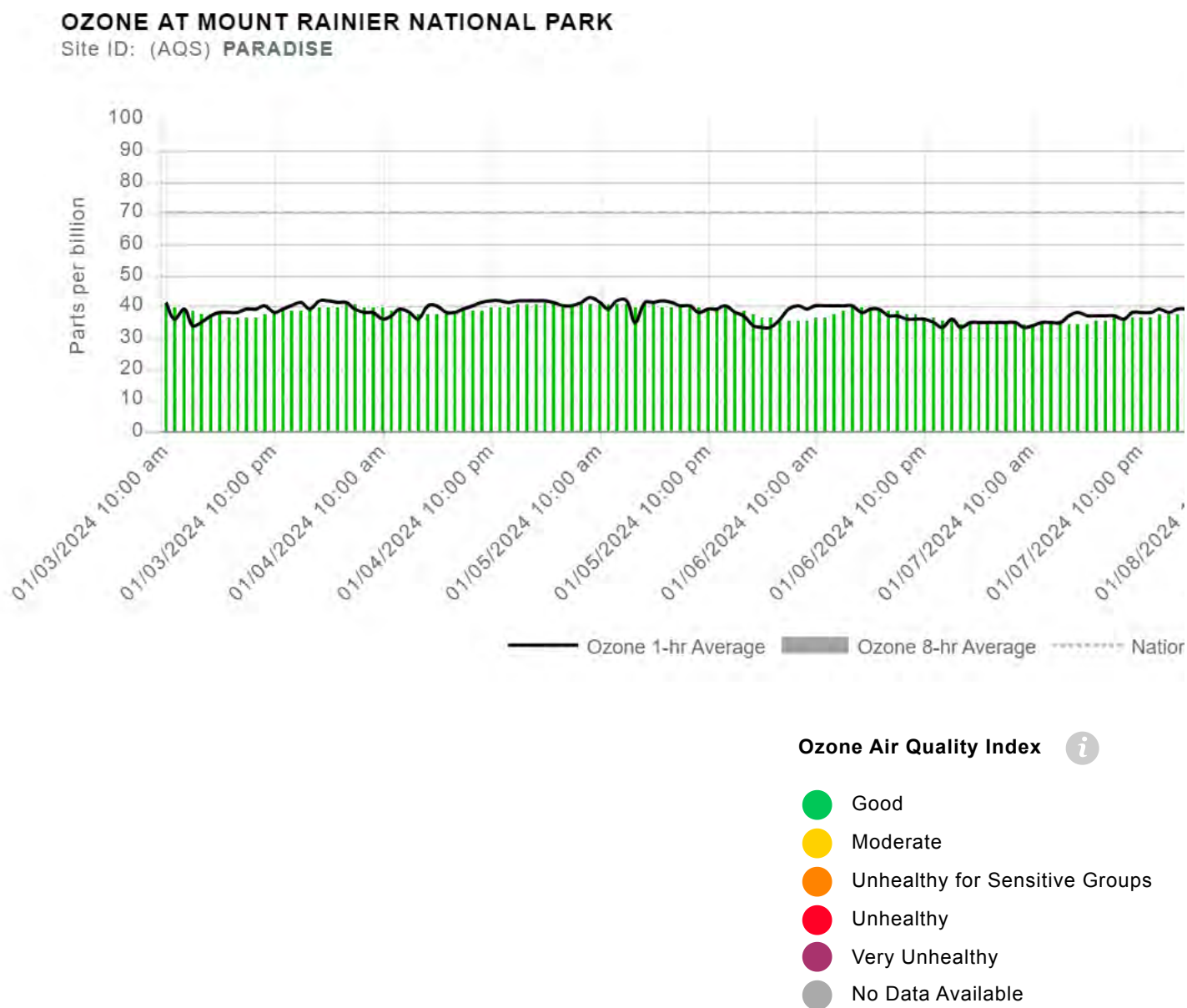
Two leaves, one without injury (left) and the other showing damage from ozone exposure (right).

Images from the NPS/USFS report "Guide to Ozone Injury in Vascular Plants in the Pacific Northwest"

High levels of ozone have also been measured in rural areas surrounding the park in Enumclaw (10 miles north of the park), Cedar River (30 miles north of the park), and Pack Forest (15 miles west of the park). Chlorotic foliar spotting on the foliage of ponderosa pine at Pack Forest has been reported and scientists hypothesized that ozone-sulfur dioxide synergism was responsible for the damage.

Ozone impacts on sensitive vegetation in the Pacific Northwest have received little attention until recent years because of the relatively low levels of ozone in the area. Ozone sensitive species in Mount Rainier have recently been identified and are being monitored in selected areas. Passive ozone monitors are also used to document ozone levels at sites where vegetation plots have been established. In addition, continuous ozone monitors are in operation at Tahoma Woods and Paradise. The [Guide to Ozone Injury in Vascular Plants of the Pacific Northwest \(https://www.fs.fed.us/pnw/pubs/pnw\\_gtr446.pdf\)](https://www.fs.fed.us/pnw/pubs/pnw_gtr446.pdf) describes some of the effects of ozone on vegetation. This document is the result of NPS and U.S. Forest Service studies of ozone sensitive plant species.

This graph shows how ozone is affecting air quality at Paradise.



[View More Data \(https://www.nps.gov/subjects/air/current-data.htm?site=mora&location=paradise\)](https://www.nps.gov/subjects/air/current-data.htm?site=mora&location=paradise)

# Air Toxics

Air Toxics is a term that includes persistent organic pollutants and heavy metals. Studies indicate that air pollutants from Europe and Asia remain airborne for thousands of miles across the Pacific Ocean and deposit in snow at relatively high elevations in North America. Air toxics also originate from local and regional sources. These contaminants such as DDT, dioxin and mercury, may accumulate in annual snowpack, particularly in higher elevation ecosystems. Once deposited, many pollutants, particularly persistent organic pollutants, accumulate and concentrate in foodwebs, threatening the viability of aquatic and terrestrial ecosystems. These air toxics are of particular concern because they remain in the environment a long time, can accumulate in the biological tissue of organisms, and are toxic to humans and wildlife.

There is very little information on the accumulation of any of these toxic materials in the natural environments of the U.S. or elsewhere in the world. The National Park Service is initiating an air-toxic focused assessment program based in the National Parks of the western United States to provide spatially extensive, site specific, and temporally resolved information regarding the exposure, accumulation and impacts of airborne contaminants in these ecosystems for the purpose of instituting long-term monitoring.

## Mount Rainier Air Quality Articles

---

Showing results 1-3 of 3

Sort By: Recently Updated ▼

---

### Historic Visibility Studies in National Parks

<https://www.nps.gov/articles/visibilitystudies.htm>

**Sites:** Air Resources Division, Big Bend National Park, Grand Canyon National Park, Mount Rainier National Park, North Cascades National Park, **more »**



<https://www.nps.gov/articles/visibilitystudies.htm>

Haze can negatively impact how well people can see and appreciate our national parks across the country. This article summarizes the visibility studies from the 1980s, 1990s and 2000s aimed at identifying the sources of haze causing pollution at specific parks and improving visibility monitoring methods.

---

### Series: Park Air Profiles

<https://www.nps.gov/articles/series.htm?id=98574651-1DD8-B71B-0BA56A8502905AB4>

**Type:** Series

**Sites:** Acadia National Park, Arches National Park, Badlands National Park, Bandelier National Monument, Big Bend National Park, **more »**

<https://www.nps.gov/articles/series.htm?id=98574651-1DD8-B71B-0BA56A8502905AB4>

Clean air matters for national parks around the country.



---

## Park Air Profiles - Mount Rainier National Park

<https://www.nps.gov/articles/airprofiles-mora.htm>

**Sites:** Air Resources Division, Mount Rainier National Park



<https://www.nps.gov/articles/airprofiles-mora.htm>

Air quality profile for Mount Rainier National Park. Gives park-specific information about air quality and air pollution impacts for Mount Rainier NP as well as the studies and monitoring conducted for Mount Rainier NP.

Tags: [air \(https://www.nps.gov/media/article-search.htm?q=Air\)](https://www.nps.gov/media/article-search.htm?q=Air)

Last updated: October 11, 2023

**Was this page helpful?**

☐ Yes

☐ No



An official form of the United States government. Provided by **Touchpoints**  
<https://touchpoints.app.cloud.gov/>

CONTACT INFO

**Mailing Address:**

55210 238th Avenue East  
Ashford, WA 98304

**Phone:**

360 569-2211

# Appendix D

## **Vendor Information**





Source: Original table provided in diagram "2572A-PME-03-9901B\_EMISSION POINTS.pdf"

| PROCESS LINE                   | EMISSION POINT | DESCRIPTION                                                                    | FILTERING DEVICE                 | LINE CAPACITY | EMISSION POINT HEIGHT |    | STACK DIAMETER |    | TEMPERATURE |     | ACTUAL FLOW RATE | NOMINAL FLOW RATE | WORKING HOURS | PM to environment after Filtering Device (NOMINAL) |       |        | VOCs estimation based on previous projects to environment after Filtering Device (NOMINAL) |       |        |
|--------------------------------|----------------|--------------------------------------------------------------------------------|----------------------------------|---------------|-----------------------|----|----------------|----|-------------|-----|------------------|-------------------|---------------|----------------------------------------------------|-------|--------|--------------------------------------------------------------------------------------------|-------|--------|
|                                |                |                                                                                |                                  | ODST/y        | m                     | ft | mm             | in | °C          | °F  | m3/h             | Nm3/h             | h/y           | mg/Nm3                                             | ton/y | ston/y | mg/Nm3                                                                                     | ton/y | ston/y |
| PELLET PLANT                   |                |                                                                                |                                  |               |                       |    |                |    |             |     |                  |                   |               |                                                    |       |        |                                                                                            |       |        |
| GROUND CHIPS CLEING LINE       | EP-01          | Sand and stones cleaning line                                                  | Cyclone                          | 227.211       | 15                    | 50 | 1.200          | 47 | 10          | 50  | 64.000           | 61.740            | 8.000         | 50                                                 | 24,70 | 27,23  | -                                                                                          | -     | -      |
| WET MILLING LINE               | EP-02          | Wet hammer mill 1 pneumatic system                                             | Cyclone                          | 101.433       | 15                    | 50 | 600            | 24 | 10          | 50  | 18.000           | 17.364            | 8.000         | 50                                                 | 6,95  | 7,66   | -                                                                                          | -     | -      |
|                                | EP-03          | Wet hammer mill 2 pneumatic system                                             | Cyclone                          | 101.433       | 15                    | 50 | 600            | 24 | 10          | 50  | 18.000           | 17.364            | 8.000         | 50                                                 | 6,95  | 7,66   | -                                                                                          | -     | -      |
| DRYING LINE                    | EP-04          | Drum dryer                                                                     | Cyclone + WESP + RTO             | 405.733       | 27                    | 90 | 2.200          | 87 | 55          | 131 | 210.730          | 175.410           | 8.000         | 20                                                 | 28,07 | 30,94  | 17                                                                                         | 23,86 | 26,30  |
| DRY INTERMEDIATE STORAGE       | EP-05          | Dry product intermediate storage                                               | Filter                           | -             | 13                    | 44 | No Stack       |    | 10          | 50  | 1.500            | 1.447             | 8.000         | 5                                                  | 0,06  | 0,06   | -                                                                                          | -     | -      |
|                                | EP-06          | Dry product intermediate storage                                               | Filter                           | -             | 13                    | 44 | No Stack       |    | 10          | 50  | 1.500            | 1.447             | 8.000         | 5                                                  | 0,06  | 0,06   | -                                                                                          | -     | -      |
| DRY MILLING AND PELLETING LINE | EP-08          | Dry hammer mill 1,2,3&4 pneumatic system<br>Pellet cooler 1&2 pneumatic system | Cyclofilter/Cyclone +<br>RTO/RCO | 417.905       | 27                    | 90 | 2.100          | 83 | 101         | 214 | 232.278          | 169.576           | 7.500         | 5                                                  | 6,36  | 7,01   | 23                                                                                         | 29,25 | 32,25  |
| SAWDUST INTERMEDIATE STORAGE   | EP-09          | Milled dry product intermediate storage                                        | Filter                           | -             | 11                    | 36 | No Stack       |    | 10          | 50  | 1.500            | 1.447             | 7.500         | 5                                                  | 0,05  | 0,06   | -                                                                                          | -     | -      |
| PELLET SILOS                   | EP-10          | Silo air renovation system. 6 extractors per silo                              | Extractor                        | -             | 28                    | 93 | No Stack       |    | 10          | 50  | 27.540           | 26.567            | 8.000         | 15                                                 | 3,19  | 3,51   | -                                                                                          | -     | -      |
|                                | EP-11          | Silo air renovation system. 6 extractors per silo                              | Extractor                        | -             | 28                    | 93 | No Stack       |    | 10          | 50  | 27.540           | 26.567            | 8.000         | 15                                                 | 3,19  | 3,51   | -                                                                                          | -     | -      |
|                                | EP-12          | Silo air renovation system. 6 extractors per silo                              | Extractor                        | -             | 28                    | 93 | No Stack       |    | 10          | 50  | 27.540           | 26.567            | 8.000         | 15                                                 | 3,19  | 3,51   | -                                                                                          | -     | -      |
|                                | EP-13          | Silo air renovation system. 6 extractors per silo                              | Extractor                        | -             | 28                    | 93 | No Stack       |    | 10          | 50  | 27.540           | 26.567            | 8.000         | 15                                                 | 3,19  | 3,51   | -                                                                                          | -     | -      |
|                                | EP-14          | Silo air renovation system. 6 extractors per silo                              | Extractor                        | -             | 28                    | 93 | No Stack       |    | 10          | 50  | 27.540           | 26.567            | 8.000         | 15                                                 | 3,19  | 3,51   | -                                                                                          | -     | -      |

**From:** [Antonio Torrubia](#)  
**To:** [Brandon Henderson](#); [Alberto Muela](#); [Forcus Martínez](#)  
**Cc:** [Kim Alexander](#); [Mark Boivin](#); [Illya Kobzev](#)  
**Subject:** RE: Air Emissions Questions  
**Date:** Friday, June 23, 2023 6:00:56 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

Hi Brandon,

The only points with NOx and CO emissions are those where there is combustion. Therefore, points EP04 and EP-08.

These would be the preliminary data that we can give at this time:

EP04 – DRYING LINE:

Carbon Monoxide (CO) (lbs/hr): ≤42 lbs/hr

Nitrogen Oxide (NOx) (lbs/hr): ≤52 lbs/hr

EP08 – DRY MILLING AND PELLETING LINE:

Carbon Monoxide (CO) (lbs/hr): ≤16 lbs/hr

Nitrogen Oxide (NOx) (lbs/hr): ≤5 lbs/hr

Note: NOx emissions for Dryer Island are based on fuel nitrogen level at 0.22% bone dry basis. Higher nitrogen content within fuel will result in higher NOx emissions.

We will include this data in the drawing table and we will send it to you updated as soon as possible.

Regarding the cyclone filters, they are equipment that incorporate a bag filter, in order to reduce PM emissions up to 5 mg/Nm<sup>3</sup>.

We are still studying the final design and selecting the supplier. As soon as we have selected it, we will send the vendor documentation.

It is a very common equipment in our plants, we can send documentation of another project if you need it urgently but it may not correspond to the final vendor.

Un saludo / Best regards,

**Antonio Torrubia**

R+D+i Manager

T. +34 976 459 459 | M. +34 695 155 907

 [atorrubia@prodesa.net](mailto:atorrubia@prodesa.net)

**PRODESA**  
"Your local pelleting expert around the world"

PRODESA Medioambiente SLU – PART OF PRODESA GROUP  
Avda. Diagonal Plaza, Edificio Plaza Center 20, Planta 3  
50197 Zaragoza (España)  
[www.prodesa.net](http://www.prodesa.net)



Antes de imprimir este e-mail piense bien si es necesario hacerlo: El medio ambiente es cosa de todos.  
Before printing this e-mail, think carefully if it is necessary to do so: The environment is everyone's business.

The information contained in this email and, where appropriate, in the its attached documents, is privileged information for the exclusive use of the persons to whom it is addressed. It is requested, if you are not the recipient of this email, to notify the sender and proceed to the deletion thereof. Any misuse of said information shall be at your own risk and liability. Please be advised that your personal data is being processed by PRODESA MEDIOAMBIENTE S.L.U., for administrative and business relationship management purposes, as well as the maintenance of electronic communications. No assignment of your personal data is contemplated, barring legal obligation to do so. You may exercise your rights of access, rectification, deletion, opposition, limitation and portability at Avda. Diagonal Plaza 30, Edificio Plaza Center 20, 3ª Planta, 50197 Zaragoza, or via email [lpod@prodesa.net](mailto:lpod@prodesa.net), specifying the specific right that is wished to be exercised and enclosing thereto the document accrediting one's identity.

---

---

**De:** Brandon Henderson <bhenderson@pnwrenewable.com>

**Enviado el:** jueves, 22 de junio de 2023 19:21

**Para:** Alberto Muela <amuela@prodesa.net>; Antonio Torrubia <atorrubia@prodesa.net>; Forcus Martínez <fmartinez@prodesa.net>

**CC:** Kim Alexander <kalexander@pnwrenewable.com>; Mark Boivin <mboivin@pnwrenewable.com>

**Asunto:** Air Emissions Questions

**Importancia:** Alta

Alberto,

Can we add NOx and CO rate emission's to chart? We're need to include those in our Air Permit.

Also, we need clarification on the cyclone filter. Is it a traditional cyclone or will it have an actual filter in the system like a baghouse.

We also would like to have the vendor documentation to attach to our air permit application. The state is used to seeing that in the applications.

Regards,

Brandon Henderson  
Director of Engineering  
Pacific Northwest Renewable Energy  
M: (254) 813-3260

**Offer number:**

|      |     |    |      |
|------|-----|----|------|
| 2572 | OFS | 05 | 0007 |
|------|-----|----|------|

**Date:**

06/14/2021

**To:** Philip Heasman - CEO

**Company:** PNWRE

**Address:** P.O. 391 Sth Egremont, MA 01258, USA

**E-mail:** pheasman@pnwrenewable.com

**Telephone:** +44 (0)7808 293864 (UK)  
+1 860 383 5444 (USA)

Dear Sirs, please find enclosed our offer for the following products / services:

|                                         |                                                           |
|-----------------------------------------|-----------------------------------------------------------|
| <b>REQUESTED PRODUCTS/<br/>SERVICES</b> | <b>Supply of a wood pellets production plant</b>          |
| <b>DELIVERY TIME</b>                    | To be checked inside                                      |
| <b>PRICE</b>                            | To be checked inside                                      |
| <b>METHOD OF PAYMENT</b>                | To be checked inside                                      |
| <b>OFFER<br/>VALIDITY</b>               | To be checked inside                                      |
| <b>NOTES</b>                            | General Conditions of Sales according to attached ANNEX 1 |

In case of accepting the conditions exposed in this offer, please send us back this document properly signed as a sign of acceptance. If you wish, you can use your own document.

☐ I agree to receive commercial communications from Prodesa by email.

**From PRODESA NORTH AMERICA**

Name and position:

**ACCEPTANCE by client**

Name and position:

The data furnished will be processed by PRODESA MEDIOAMBIENTE S.L. with CIF B50811074, registered office at Avda Diagonal Plaza 30, Plaza Center 20 Building, 3rd Floor, 50197 Zaragoza (ZARAGOZA). The objective of the data treatment is to make the requested budget and manage a possible business relationship. The data will be kept as long as the commercial relationship is maintained or for the legally necessary time. The legal basis for this treatment is the pre-contractual relationship. The data will not be disclosed to third parties, except legal obligation. You can request your rights of access, rectification, deletion, limitation, portability and opposition by sending an e-mail to [lpd@prodesa.net](mailto:lpd@prodesa.net) or a letter to the postal address indicated above, attaching a copy of the ID card and indicating the requested right. You can also submit a claim to the Spanish Data Protection Agency.

## PRELIMINARY OFFER

## PNWRE

## WOOD PELLETS PRODUCTION PLANT



1. TABLE OF CONTENTS

1. TABLE OF CONTENTS .....3

2. INTRODUCTION .....4

3. GENERAL DESCRIPTION .....8

4. DESIGN DATA .....15

5. EQUIPMENT DESCRIPTION .....20

6. TRANSPORT, ERECTION SUPERVISION, COMMISSIONING.....66

7. SUPPLY LIMITS.....67

8. PRICE.....68

9. TERMS OF PAYMENT .....69

10. PRICE VALIDITY .....69

11. DELIVERY TIME .....69

12. NOT INCLUDED.....70

13. ANNEX.....71

## 2. INTRODUCTION

This offer has been prepared according to the request of **PNWRE** for the supply of a wood pellets production plant.

The design data that have been considered for this budget offer are the following:

| EMPLACEMENT      |                                                                                               |      |                              |
|------------------|-----------------------------------------------------------------------------------------------|------|------------------------------|
| State            | Washington, USA                                                                               | City | Hoquiam, Grays Harbor County |
| Site coordinates | 46° 58' 34 " N; 123° 54' 58" W<br>(Corner of Airport Way & Paulson Rd – Port of Grays Harbor) |      |                              |

| SITE CONDITIONS     |                                                           |                         |                                |
|---------------------|-----------------------------------------------------------|-------------------------|--------------------------------|
|                     | Minimum                                                   | Average                 | Maximum                        |
| Ambient temperature | 14 ° F / -10 °C                                           | 51 ° F / 10 °C          | 89 ° F / 31 °C                 |
| Relative humidity   | 85 - 90%                                                  | Site elevation (o.s.l.) | 18 ft – 5.5 m                  |
| Wind load           | 48 psf - 235 kg/m <sup>2</sup> ;<br>(135 mph - 60 m/s)    | Snow load               | 25 psf - 122 kg/m <sup>2</sup> |
| Seismic load        | Ss = 1.532; S1 = 0.712; TL = 16; Sds = 1.225; PGA = 0.734 |                         |                                |

| ELECTRICAL DATA |                   |           |       |
|-----------------|-------------------|-----------|-------|
| Voltage supply  | 460 Vac<br>24 Vdc | Frequency | 60 Hz |

**INPUT MATERIAL:**

| RAW MATERIAL SPECIES (FOREST RESIDUALS) – GENERAL PROCESS |                     |        |                         |
|-----------------------------------------------------------|---------------------|--------|-------------------------|
| Type                                                      | Softwood            |        | Hardwood                |
| Proportion (%)                                            | 80 - 90%            |        | 10 - 20%                |
| Species                                                   | Douglas Fir:        | 37.04% | Red Alder: 10.41%       |
|                                                           | W Hemlock:          | 42.74% | Big Leaf Maple: 1.44%   |
|                                                           | W Red Cedar:        | 3.00%  | Black Cottonwood: 0.29% |
|                                                           | Sitka Spruce:       | 3.07%  | Bitter Cherry: 0.02%    |
|                                                           | Pacific Silver Fir: | 1.40%  | Oregon Ash: 0.01%       |
|                                                           | Lodgepole Pine:     | 0.43%  |                         |
|                                                           | Western White Pine: | 0.04%  |                         |
|                                                           | TOTAL:              | 87.72% | TOTAL: 12.17%           |

| RAW MATERIAL SPECIES (MILL RESIDUALS) – GENERAL PROCESS |                    |          |                             |
|---------------------------------------------------------|--------------------|----------|-----------------------------|
| Type                                                    | Softwood           |          | Hardwood                    |
| Proportion (%)                                          | 80 - 90%           |          | 10 - 20%                    |
| Species                                                 | Douglas Fir:       | 40 - 45% | Red Alder & Other: 10 - 20% |
|                                                         | W Hemlock & Other: | 40 - 45% |                             |

| RAW MATERIAL DATA – GENERAL PROCESS |                                                        |                 |  |
|-------------------------------------|--------------------------------------------------------|-----------------|--|
| Type of material                    | Forest residual – ground chips<br>(325,000 GMT/y; 50%) |                 |  |
| Product size distribution (PSD)     | < 1”                                                   | 3% (by weight)  |  |
|                                     | 1 - 6”                                                 | 87% (by weight) |  |
|                                     | > 6”                                                   | 10% (by weight) |  |
| Bulk Density                        | 350 kg/m³ (average)                                    |                 |  |
| Water content (W.B.)                | 40% (average)                                          |                 |  |
|                                     |                                                        |                 |  |
| Type of material                    | Sawdust<br>(184,000 GMT/y; 30%)                        |                 |  |
| Product size distribution (PSD)     | TBC                                                    |                 |  |
| Bulk Density                        | 350 kg/m³ (average)                                    |                 |  |
| Water content (W.B.)                | 50% (average)                                          |                 |  |



| Shavings<br>(122,600 GMT/y; 20%) |                                 |
|----------------------------------|---------------------------------|
| Type of material                 |                                 |
| Product size distribution (PSD)  | TBC                             |
| Bulk Density                     | 150 kg/m <sup>3</sup> (average) |
| Water content (W.B.)             | 25% (average)                   |

## **FUEL:**

| RAW MATERIAL SPECIES – COMBUSTION SYSTEM |                                  |                    |
|------------------------------------------|----------------------------------|--------------------|
| Type                                     | Softwood                         | Hardwood           |
| Proportion (%)                           | 45 - 55%                         | 45 - 55%           |
| Species                                  | Douglas Fir<br>W Hemlock & Other | Red Alder<br>Other |

| RAW MATERIAL DATA – COMBUSTION SYSTEM |                                                     |
|---------------------------------------|-----------------------------------------------------|
| Type of material                      | <b>Bark &amp; Hogfuel</b><br>(220,000 GMT/y; 100%)* |
| Product size distribution (PSD)       | 1 - 6" (approximately)                              |
| Bulk density M.C.                     | 305 kg/m <sup>3</sup> (average)                     |
| Ash content                           | 8-10%                                               |
| Ash melting point                     | > 1100 °C                                           |
| Water content (W.B.)                  | 55 %                                                |

## **FINAL PRODUCT:**

| FINAL PELLET REQUIRED             |                                                |
|-----------------------------------|------------------------------------------------|
| Material                          | Wood pellets                                   |
| Size                              | 3.15 < L ≤ 40 mm<br>Diameter = 6 mm            |
| Bulk density                      | 650 - 750 kg/m <sup>3</sup>                    |
| Moisture Content (m.c.) wet basis | <10%                                           |
| Required capacity                 | 400,000 metric tons/year (441,000 sh.ton/year) |

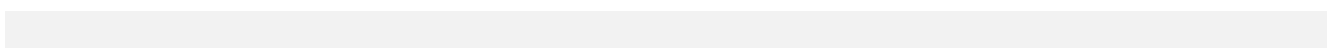
This is a **budget offer**. The final dimensioning and power of the equipment included in this offer will be defined after having analysed the raw material that the plant will work with. Meanwhile, this budget offer is based on average production figures.

Information contained in this offer is confidential and cannot be communicated to third party without our permission.

During the project realization, PRODESA reserves the right to bring all the necessary variations in design, equipment and brands in order to ensure the best operation of the plant.

## **GENERAL REMARKS ABOUT ELECTRICAL EQUIPMENT:**

- Motors IEC and NEMA. Motors included in the offer are not NFPA/ATEX Classified
- The use of low tension for all the installation (460 V and 60 Hz) has been considered.
- MCCs, I/O and PLC panels are supplied including UL certification. The design will be according to UL 508.



### 3. GENERAL DESCRIPTION

For a better process understanding, please see the process mass and energy diagram 2572-PBS-04-0001A, the process flow diagram 2572-PBS-04-0002 and the layout 2572-PME-03-1001B.

#### 3.1 RAW MATERIAL RECEPTION

We propose a truck scale system to control the raw materials received in the plant.

In order to receive the raw material and fuel, and discharge the trucks, three truck dumpers are included: one for the forest residues, other for the sawmill residues and a third one for the biomass used as fuel.

Once the product is discharged by the trucks, it will be storage in piles through a front end loader.



#### 3.2 WET MILLING LINE

The line includes:

- Raw material moving floors
- Forest residuals cleaning and screening unit
- Sawmill residuals screening unit
- Wet hammer mills

One (1) 250 m<sup>3</sup> MOVING FLOOR delimited by walls to store the ground chips, and a second one to store the sawdust and shavings are included.



Example of moving floor

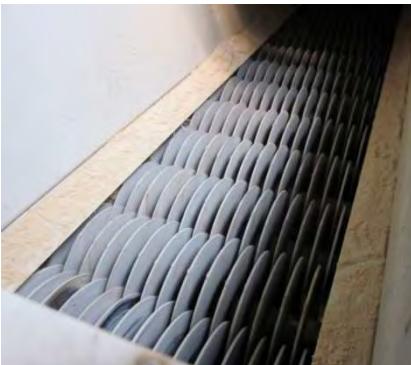


The chips moving floor discharges the product into a chain conveyor to feed the CLEANING AND SCREENING unit, with the objective of separate impurities (sand, stones), fines and overs. Fines will be discharge to the dryer feeding system, while the intermediate fraction will be sent to the wet hammer mills. Impurities and overs will be discharged into a container (by client).



Example of cleaner and screening system

The sawdust and shavings moving floor discharges the product to a DISC SCREEN to separate big pieces that will be sent to the wet hammer mills. The good product will be sent directly to the dryer feeding system.





So, the cleaned chips will be processed in the wet hammer mills to reduce the particle size so they have an optimum drying

Two hammer mills of 500 kW each have been selected to reduce the particle size of the cleaned chips so they have an optimum drying process and they reach the dry milling stage with the optimum moisture content and size.

The produced microchips are discharged downwards by mechanical and pneumatic systems. Thus, one pneumatic system for each hammer mill is required, and each one equipped with dust collection systems, in order to control the dust emission to the atmosphere and to recover the small size particles into the product flow.



General view of wet milling line



Wet hammer mill

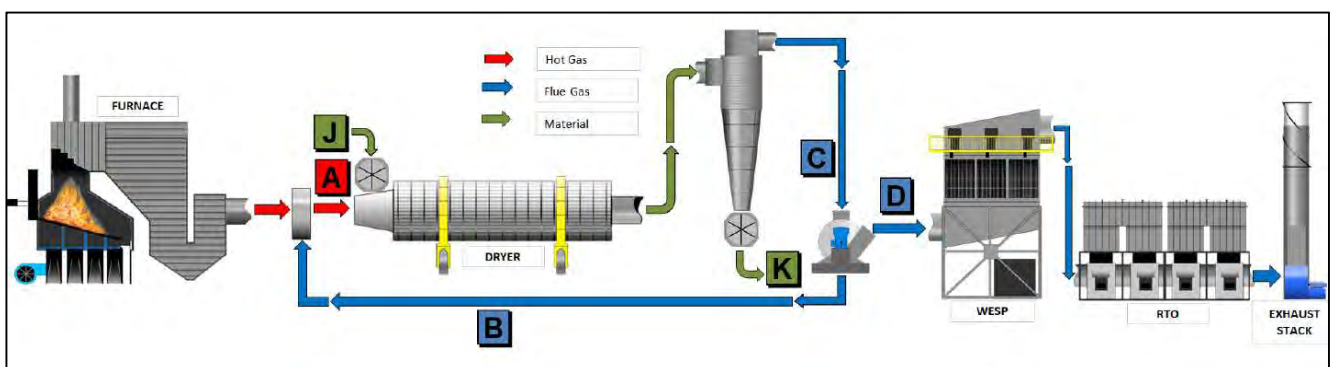
### **3.3 DRYER FEEDING SYSTEM**

The microchips produced in the wet milling line are transported by several conveyors to the drying island.

### **3.4 DRYING ISLAND: DRUM DRYER AND HEAT GENERATION SYSTEM**

The drying line is the heart of the plant. Design, control and operation are the key to achieve the production objectives.

The drying island includes: Heat generation system, Drum dryer, and Gases emissions treatment (WESP and RTO).



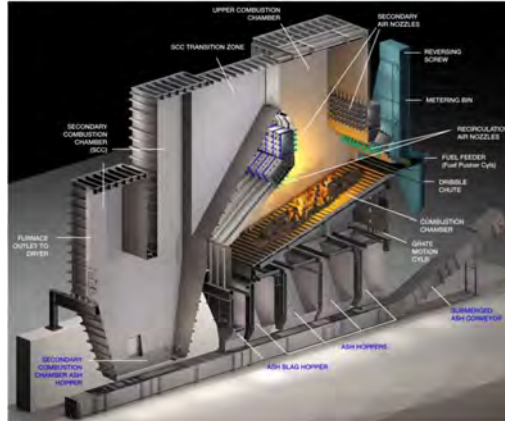
## HEAT GENERATION SYSTEM: Biomass Furnace and Fuel Feeding System

We include a biomass furnace of 55 m<sup>2</sup> to provide the thermal energy required by the drum dryer. This furnace has pusher grates and a biomass dosing system by a fuel feed pushers.

A 250 m<sup>3</sup> moving floor discharges the biomass used as fuel to a chain conveyor to feed the furnace metering bin.



Example of Heat Energy System



Heat Energy System Overview

## DRUM DRYER

The selected dryer is a high temperature drum dryer that uses hot gases at around 400°C provided by a heat generation system (biomass furnace)

During the drying process the raw material features will change and it is necessary to work gently with the wood in order to keep the proper conditions to ensure the best product quality. Moisture, colour and chemical parameters of raw material are related to the drying process.

The drum dryer has the following benefits:

- Well proven drying system
- Low energy consumption
- Automated operation
- Good product quality



### DRUM DRYER DESCRIPTION:

The Dryer System receives hot gas from the Heat Energy System and combines this hot gas stream with the Dryer System's flue gas stream within the Dryer System's Recycle Bustle. Once two gas streams are mixed, the resultant gas mixture enters the Dryer Drum for purpose of drying wet woody biomass.

Dryer System's Metering Bin is located at ground level and material from the Metering Bin is fed to Dryer System's Infeed Airlock via a chain conveyor.

Dryer Drum is a single-pass unit that is responsible for distributing and classifying each biomass particle to allow for its efficient drying. This is accomplished with utilization of a complex 'flighting system' within the Dryer Drum. Dried material is conveyed from the drum discharge to two (2) High Efficiency Cyclones that are responsible for effectively removing dried biomass from flue gas stream. Dried biomass exits out the bottom of High Efficiency Cyclones and into the Cyclone Airlocks; each Cyclone has its own dedicated Airlock.

Dried biomass from Cyclone Airlocks is received by a Collection Screw that conveys dried biomass to the Diverter Gate. The Diverter Gate under upset operating conditions discharges biomass to client's Fire Dump. The Diverter Gate under normal operating conditions discharges material to the dry product silo feeding chain conveyor.

Flue gas exits Cyclones out the top and is processed either to the Dryer System as recycle, or to the Pollution Control Equipment (WESP + RTO)

Biomass and flue gas is conveyed through the Dryer System via an Induced Draft Fan (ID Fan).

### GASES EMISSIONS SYSTEM: WESP + RTO

To remove fine particulate from gas stream prior to discharging scrubbed flue gas stream to the atmosphere, we propose a WESP (Wet Electrostatic Precipitator).

After that, there is four-chamber RTO to receive particulate cleaned flue gas from the WESP and treat this flue gas for the purpose of VOC and CO destruction, before this flue gas is exhausted to atmosphere.



Example of WESP



Example of RTO



### **3.5 DRY PRODUCT STORAGE**

Once the product goes out from the drying process, the moisture content is around 10% and it is transported the dry product storage by a chain conveyor.

The main aim of this is to uncouple drying line and milling line. Thus, both lines can work in an uncoupled way, increasing the production capability of the plant because during maintenance works in one line, the other one continues producing.

In addition, due to moisture content at dryer outlet is around 10%, it is required to have a certain retention time after the dryer in order to get very homogenous moisture content in the product.

During storage, the whole product is in contact and moisture content will become an average value into the silos. Homogenous moisture content means a stable pelletizing process and high pellet quality.

A chain conveyor transports the product from the outlet of the buffer silo to the milling line.

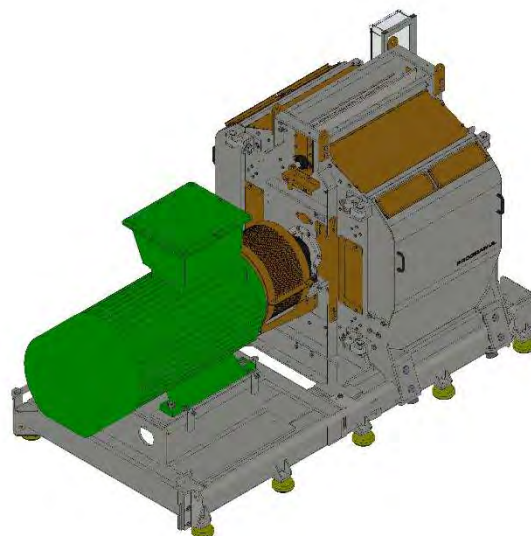


### **3.6 DRY MILLING LINE**

As the most, dry milling line is required to reduce the particle size, thus the machines and line design has been developed to get the required wood pellet quality.

We propose one milling line with four (4) hammer mill with one (1) motor of 900 HP each one. The product is discharged by gravity system, equipped also with a cyclofilter, in order to control de dust emissions to the atmosphere.

To control de VOCs emissions, the air flow of two of the four hammer mills will pass through ~~an scrubber and PTO~~ together with the pellet cooler air flow. (Design change from RTO to RCO)





### **3.7 DRY AND MILLED PRODUCT STORAGE**

In between the dry milling and the pelleting line there another silo for the product storage is included.

The main aim of this storage is to uncouple the milling line and pelletizing line. In addition, a more homogenous moisture content in the product will be achieved which is one of the key factors to reach high pelletizing productions.

At the outlet of the silo, a chain conveyor transports the product to the pelleting line.

### **3.8 PELLETING LINE**

Pellet mills feeding will be done by a dosing screw conveyor. This system works fulltime charge in order to get the best performance in the pellet mill. A conditioner is installed between the conveyor and the pellet mill in order to adjust the moisture content in the raw material as required and to have a continuous feeding in the pellet mill.

We propose two pelleting lines with six (6) pellet mills with 500 HP each.

Once the pellet is produced, the temperature in the product is around 90°C, thus two (2) coolers (one per line) are required to achieve the quality and to comply with the pellets specifications. The cooler is equipped with a ~~cyclone~~ to reduce the dust emission to the atmosphere and to recover the very small size particles into the product flow. (Design change from cyclones to baghouse)

Additionally, another ~~RTO~~ receives VOC laden flue gas stream from the pelletizing line and from 2 dry hammer mills, which treats this flue gas for the purpose of VOC destruction, before this flue gas is exhausted to atmosphere. (Design change from RTO to RCO)

After each cooler, a vibratory screen sieves the product, thus fines and broken pellets that not comply with the specifications, are taken out from the line.

The final dimensioning and motorization of the pellet mills will be reviewed after having a raw material screen analysis and information about the wood species that will be processed.



3D – Example of pelleting line.



Pelleting line in a Pellet plant Prudes's design

## 4. DESIGN DATA

### 4.1 RAW MATERIAL RECEPTION

|                            |                                              |
|----------------------------|----------------------------------------------|
| Raw material               | Product as in <i>Section 2. Introduction</i> |
| Number of truck scales     | 1                                            |
| Number of truck dumpers    | 3                                            |
| Truck dumper type          | 75' Back-On Truck Dump Platform              |
| Empty weight of truck      | 30,000 lbs                                   |
| Full truck weight          | 120,000 lbs                                  |
| Platform Lift & Lower Time | 4 – 4.5 min                                  |
| Max. Dumping Angle         | 63 degrees                                   |
| HPU Horsepower/unit        | 2 x 60 HP                                    |
| Life Cycles                | 2,000,000 cycles                             |

### 4.2 WET MILLING LINE

|                                    |                                                                                       |
|------------------------------------|---------------------------------------------------------------------------------------|
| Raw material                       | Product as in <i>Section 2. Introduction</i>                                          |
| RAW MATERIAL STORAGE               |                                                                                       |
| Chips storage                      | 1 x Moving floor 250 m <sup>3</sup> (8,828 ft <sup>3</sup> )                          |
| Sawdust and shavings storage       | 1 x Moving floor 250 m <sup>3</sup> (8,828 ft <sup>3</sup> )                          |
| CHIPS CLEANING AND SCREENING UNIT  |                                                                                       |
| Design capacity                    | 57.4 ton/h                                                                            |
| Screened fractions                 | 0 – 1.5 mm<br>1.5 – 10 mm<br>10 – 60 mm<br>60 – 150 mm<br>> 150 mm                    |
| Separated impurities               | Sand and stones                                                                       |
| WET MILLING LINE                   |                                                                                       |
| Number of hammer mills             | 2                                                                                     |
| Design capacity                    | 54.2 ton/h @ 350 kg/m <sup>3</sup> = 155 m <sup>3</sup> /h (5,474 ft <sup>3</sup> /h) |
| Hammer mill installed power (each) | 500 kW (700 HP)                                                                       |

### 4.3 DRYER FEEDING SYSTEM

|                 |                               |
|-----------------|-------------------------------|
| Raw material    | Product from wet milling line |
| Design capacity | 54.2 ton/h                    |

## 4.4 DRYING ISLAND

### 4.4.1 HEAT ENERGY SYSTEM: Biomass Furnace

|                                             |                                                                                   |
|---------------------------------------------|-----------------------------------------------------------------------------------|
| Number of Reciprocating Grate Zones         | Four (4)                                                                          |
| Wet Fuel Moisture Content (bark)            | 50% (wet basis)                                                                   |
| Maximum Overall Moisture Content            | 55% (wet basis)                                                                   |
| Minimum Overall Moisture Content            | 35% (wet basis)                                                                   |
| Grate Fuel Design LHV at 50% mc (wet basis) | 3,480 Btu/lb                                                                      |
| Grate Fuel Design HHV at 50% mc (wet basis) | 4,300 Btu/lb                                                                      |
| Fuel Size (Maximum)                         | 100% bark <6"<br>90% bark <4"<br>70% all fuel >2"<br>Max 25% <1"<br>Max 15% <1/2" |
| Bulk Density of Fuel (average)              | 18 – 20 lbs/cuft (volumetric)                                                     |
| Designed Combined Fuel Alkali Content       | < 0.25 lb/MMBtu                                                                   |
| Material Grate Bars                         | High Heat Resistant Steel (ASTM A297, Grade HD)                                   |
| Grate Speed Control                         | 10% to 100%, modulating                                                           |
| Thermal Turn Down Ration                    | 4:1                                                                               |
| Primary Air Static Pressure                 | 5" WC                                                                             |
| Secondary Air Static Pressure               | 12" WC                                                                            |
| Number of Secondary Air Zones               | Two                                                                               |

### 4.4.2 DRUM DRYER

#### A. *Design ambient conditions:*

|                   |               |
|-------------------|---------------|
| Temperature       | 51° F (10 °C) |
| Relative humidity | 85-90%        |

#### B. *Product and design data:*

|                                |                                    |
|--------------------------------|------------------------------------|
| Product inlet                  | Microchips from wet milling line   |
| Product inlet moisture content | 45% wet basis                      |
| Product inlet flow             | 85.5 ton/h @ 45% mc                |
| Dryer technology               | Drum dryer                         |
| Product outlet flow            | 51.11 ton/h <sup>[1]</sup> @ 8% mc |
| Dryer drum size                | Ø 20' by 90' long                  |

[1] At design ambient conditions

### C. Thermal energy

|                       |               |
|-----------------------|---------------|
| Gas inlet temperature | 510°C (950°F) |
| BTU/hr (HHV)          | 164,810,016   |

[1] At design ambient conditions and product not frozen

#### Remarks:

- With very wet and/or frozen raw material, water evaporation and dry raw material capacity is reduced in spite of higher energy consumption.
- If strong and short time oscillations in heat supply, product inlet moisture, particle size distribution or particle composition occur, a constant outlet moisture content cannot be guaranteed.
- If ambient conditions and/or moisture content of wet product change, the dryer capacity and also the thermal energy consumption will change.

### 4.4.3 GASES EMISSIONS TREATMENT: WESP + RTO

|                                       |                                 |
|---------------------------------------|---------------------------------|
| Air flow (from drum dryer)            | 124,031 ACFM (210,730 m³/h)     |
| Inlet temperature                     | 113°C (235°F)                   |
| WET ELECTROSTATIC PRECIPITATOR (WESP) |                                 |
| Quantity                              | 1                               |
| Number of Ø10" tubes                  | 621                             |
| Number of Fields                      | 3                               |
| REGENERATIVE THERMAL OXIDIZER (RTO)   |                                 |
| Quantity                              | 1                               |
| Number of combustion chambers         | 4                               |
| Combustion chambers size              | 11' wide by 23' long by 8' tall |
| Projected gas consumption             | 5.7 mmBTU/h                     |

### 4.5 DRY PRODUCT STORAGE

|                  |                                |
|------------------|--------------------------------|
| Product          | Dry product from dryer system. |
| Moisture content | 8% (wet basis)                 |
| Description      | Vertical silo.                 |
| Capacity         | 1,000 m³ (35,315 ft³)          |

### 4.6 DRY MILLING LINE

|                             |                                  |
|-----------------------------|----------------------------------|
| Inlet product               | Product from dry product storage |
| Number of hammer mills      | 4                                |
| Electrical power (each one) | 900 HP                           |
| Design capacity (each)      | 15,5 ton/h                       |

\*The final dimensioning and the motorization of the hammer mills will be reviewed after having a raw material screen analysis and information about the wood species that will be processed.

## 4.7 DRY AND MILLED PRODUCT STORAGE

|                  |                                                |
|------------------|------------------------------------------------|
| Product          | Dry and milled product from dry milling line.  |
| Moisture content | 8% (wet basis)                                 |
| Description      | Vertical silo.                                 |
| Capacity         | 1,000 m <sup>3</sup> (35,315 ft <sup>3</sup> ) |

## 4.8 PELLETING LINE

|                                                      |                                                                                                                |
|------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|
| PELLETING LINE                                       |                                                                                                                |
| Product                                              | Dry and milled product from dry milling line.                                                                  |
| Number of pellet mills                               | 12                                                                                                             |
| Electrical power (each one)                          | 500 HP                                                                                                         |
| Design capacity (each one)                           | 5.5 ton/h                                                                                                      |
| Pellets diameter                                     | 6 mm                                                                                                           |
| PELLETING LINE: <del>RTO</del> Client updated to RCO |                                                                                                                |
| Air flow (from drum dryer)                           | 29,500 ACFM (50,121 m <sup>3</sup> /h) from DHM<br>76,000 ACFM (129,125 m <sup>3</sup> /h) from pelleting line |
| Quantity                                             | 1                                                                                                              |
| Number of combustion chambers                        | 4                                                                                                              |
| Combustion chambers size                             | 11' wide by 23' long by 8' tall                                                                                |
| Projected gas consumption                            | <del>1.8 mmBTU/h</del> Client updated to 2 x 2.25 MMBtu/hr                                                     |

\*The final dimensioning and the motorization of the pellet mill will be reviewed after having a raw material screen analysis and information about the wood species that will be processed.

## INSTALLED ELECTRICAL POWER

The table below shows the installed electrical power per lines of the equipment included in the main scope of supply of this offer. It is important to remark that these values are indicative and with no contractual value.

| Description                    | Electrical installed power |                  |
|--------------------------------|----------------------------|------------------|
|                                | HP                         | kW               |
| Raw material reception         | 378 HP                     | 282 kW           |
| Wet milling line               | 2,301 HP                   | 1,717 kW         |
| Dryer feeding system           | 115 HP                     | 86 kW            |
| Drying island                  | 3,434 HP                   | 2,562 kW         |
| Dry product storage            | 132 HP                     | 99 kW            |
| Dry milling line               | 4,266 HP                   | 3,183 kW         |
| Dry and milled product storage | 137 HP                     | 103 kW           |
| Pelleting line                 | 7,981 HP                   | 5,956 kW         |
| <b>TOTAL</b>                   | <b>18,744 HP</b>           | <b>13,988 kW</b> |

## 5. EQUIPMENT DESCRIPTION

| Pos                        | Units                         | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                       |                               |                   |                |                            |                 |                    |                |                |           |             |                  |
|----------------------------|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-------------------------------|-------------------|----------------|----------------------------|-----------------|--------------------|----------------|----------------|-----------|-------------|------------------|
| 5.1                        |                               | RAW MATERIAL RECEPTION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                       |                               |                   |                |                            |                 |                    |                |                |           |             |                  |
| 5.1.1                      | 1                             | <p><b>Truck Scale</b></p> <p>Truck scale for controlling the raw material and fuel entrance. It includes a visor with high memory capacity for different products, clients, suppliers, etc.</p> <p><u>Technical data</u></p> <table><tr><td>Dimensions</td><td>85.35 x 9.8 ft (26.016 x 3 m)</td></tr><tr><td>Height</td><td>11.4” (290 mm)</td></tr><tr><td>Capacity</td><td>80 ton</td></tr><tr><td>Number of cells</td><td>12 (analogics)</td></tr></table>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Dimensions            | 85.35 x 9.8 ft (26.016 x 3 m) | Height            | 11.4” (290 mm) | Capacity                   | 80 ton          | Number of cells    | 12 (analogics) |                |           |             |                  |
| Dimensions                 | 85.35 x 9.8 ft (26.016 x 3 m) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                       |                               |                   |                |                            |                 |                    |                |                |           |             |                  |
| Height                     | 11.4” (290 mm)                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                       |                               |                   |                |                            |                 |                    |                |                |           |             |                  |
| Capacity                   | 80 ton                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                       |                               |                   |                |                            |                 |                    |                |                |           |             |                  |
| Number of cells            | 12 (analogics)                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                       |                               |                   |                |                            |                 |                    |                |                |           |             |                  |
| 5.1.2                      | 3                             | <p><b>75’ Back-On Truck Dumper</b></p> <p>It includes a 75’ dumping platform</p> <p>The platform is designed for a GVW of 120,000 pounds and utilizes two 3 stage inverted telescopic cylinders which operate at a pressure of 1,600psi with a safety factor of 3:1. Once the receiving truck has backed onto the platform it is raised to its maximum angle causing the material to flow freely into the ground. The full lift and lower cycle is completed in approximately 4.5 minutes.</p> <p>It includes a walkway on the driver side as well as handrail on both the passenger and driver side</p> <p><u>Technical data/unit</u></p> <table><tr><td>Empty weight of truck</td><td>30,000 lbs</td></tr><tr><td>Full truck weight</td><td>120,000 lbs</td></tr><tr><td>Platform Lift &amp; Lower Time</td><td>4 – 4.5 minutes</td></tr><tr><td>Max. Dumping Angle</td><td>63 degrees</td></tr><tr><td>HPU Horsepower</td><td>2 x 60 HP</td></tr><tr><td>Life Cycles</td><td>2,000,000 cycles</td></tr></table> | Empty weight of truck | 30,000 lbs                    | Full truck weight | 120,000 lbs    | Platform Lift & Lower Time | 4 – 4.5 minutes | Max. Dumping Angle | 63 degrees     | HPU Horsepower | 2 x 60 HP | Life Cycles | 2,000,000 cycles |
| Empty weight of truck      | 30,000 lbs                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                       |                               |                   |                |                            |                 |                    |                |                |           |             |                  |
| Full truck weight          | 120,000 lbs                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                       |                               |                   |                |                            |                 |                    |                |                |           |             |                  |
| Platform Lift & Lower Time | 4 – 4.5 minutes               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                       |                               |                   |                |                            |                 |                    |                |                |           |             |                  |
| Max. Dumping Angle         | 63 degrees                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                       |                               |                   |                |                            |                 |                    |                |                |           |             |                  |
| HPU Horsepower             | 2 x 60 HP                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                       |                               |                   |                |                            |                 |                    |                |                |           |             |                  |
| Life Cycles                | 2,000,000 cycles              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                       |                               |                   |                |                            |                 |                    |                |                |           |             |                  |

| Pos                   | Units                 | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |              |                    |                  |          |                       |                       |
|-----------------------|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|--------------------|------------------|----------|-----------------------|-----------------------|
| 5.2                   |                       | WET MILLING LINE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |              |                    |                  |          |                       |                       |
| 5.2.1                 | 1                     | <p><b>Ground chips moving floor</b></p> <p>It receives the ground chips from the client´s front end loader. Delimited by concrete walls (out of PRODESA´s supply)</p> <p><u>Technical data:</u></p> <table><tr><td>Volume</td><td>250 m³ (8,828 ft³)</td></tr><tr><td>Number of grates</td><td>4</td></tr><tr><td>Hydraulic unit motors</td><td>2 x 60 HP (2 x 45 kW)</td></tr></table>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Volume       | 250 m³ (8,828 ft³) | Number of grates | 4        | Hydraulic unit motors | 2 x 60 HP (2 x 45 kW) |
| Volume                | 250 m³ (8,828 ft³)    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |              |                    |                  |          |                       |                       |
| Number of grates      | 4                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |              |                    |                  |          |                       |                       |
| Hydraulic unit motors | 2 x 60 HP (2 x 45 kW) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |              |                    |                  |          |                       |                       |
| 5.2.2                 | 1                     | <p><b>Cleaning unit feeding chain conveyor</b></p> <p>It receives the ground chips from the moving floor (pos 5.2.1) and feeds the cleaning and screening unit (pos 5.2.3)</p> <p>Supports included.</p> <p><u>Technical data:</u></p> <table><tr><td>Total length</td><td>126 ft (38.5 m)</td></tr><tr><td>Inclination</td><td>0º - 25º</td></tr><tr><td>Installed power</td><td>15 kW (20 HP)</td></tr></table>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Total length | 126 ft (38.5 m)    | Inclination      | 0º - 25º | Installed power       | 15 kW (20 HP)         |
| Total length          | 126 ft (38.5 m)       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |              |                    |                  |          |                       |                       |
| Inclination           | 0º - 25º              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |              |                    |                  |          |                       |                       |
| Installed power       | 15 kW (20 HP)         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |              |                    |                  |          |                       |                       |
| 5.2.3                 | 1                     | <p><b>Cleaning and screening unit</b></p> <p>To separate impurities and to screen different fractions.</p> <p>It consists on integrated roller screening and air separation units, which enables screening and cleaning of infeed material. The infeed material mix is screened into different fractions, to get a better cleaning result for each fraction.</p> <p>All rolls in the roller bed rotate in the same direction shaking and conveying the material towards the rear end of the screen. The finest fraction (e.g. sand and dust) is separated in the first roller section and accordingly the coarse fractions are separated later on the coarser section(s).</p> <p>Mixture of wood and impurities move along the roller bed, heavy contaminants are concentrated and form a mineral-enriched layer on the roller bed. Mineral-enriched layer is taken out in a larger gap. This sub-flow is further cleaned in an air cleaning unit. Sand and stones are separated by airflow and the wood material is returned to the process via cyclones.</p> <p>Defined by roller pattern and gap size (smaller than previous “removal gap” for enriched material) the fractions to be separated, go through the gaps of the rollers and fall under the roller bed for further processing.</p> <p>It includes the screens, cleaning units, pneumatici systems, structures, electrical cabinets and control system</p> |              |                    |                  |          |                       |                       |



| Pos               | Units                   | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |              |                   |             |                  |                   |                         |           |                 |         |                  |                  |                 |
|-------------------|-------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|-------------------|-------------|------------------|-------------------|-------------------------|-----------|-----------------|---------|------------------|------------------|-----------------|
| 5.2.4             | 1                       | <p><b>Cleaned and screened chips chain conveyor</b></p> <p>It receives the cleaned and screened chips from the cleaning and screening unit (pos 5.2.3) and discharges it into the wet hammer mills feeding chain conveyor (pos 5.2.5)</p> <p>Supports included.</p> <p><u>Technical data:</u></p> <table><tr><td>Total length</td><td>224.7 ft (68.5 m)</td></tr><tr><td>Inclination</td><td>0º - 30º</td></tr><tr><td>Installed power</td><td>30 kW (40 HP)</td></tr></table>                                                                                                                                                                                                                                                                                                                           | Total length | 224.7 ft (68.5 m) | Inclination | 0º - 30º         | Installed power   | 30 kW (40 HP)           |           |                 |         |                  |                  |                 |
| Total length      | 224.7 ft (68.5 m)       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |              |                   |             |                  |                   |                         |           |                 |         |                  |                  |                 |
| Inclination       | 0º - 30º                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |              |                   |             |                  |                   |                         |           |                 |         |                  |                  |                 |
| Installed power   | 30 kW (40 HP)           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |              |                   |             |                  |                   |                         |           |                 |         |                  |                  |                 |
| 5.2.5             | 1                       | <p><b>Wet hammer mills feeding chain conveyor</b></p> <p>It receives the chips from the previous chain conveyor (pos 5.2.4). It includes two intermediate outlets to feed each of the wet hammer mills and a final outlet as emergency exit.</p> <p>Supports included.</p> <p><u>Technical data:</u></p> <table><tr><td>Total length</td><td>82 ft (25 m)</td></tr><tr><td>Inclination</td><td>0º</td></tr><tr><td>Installed power</td><td>7.5 kW (10 HP)</td></tr></table>                                                                                                                                                                                                                                                                                                                              | Total length | 82 ft (25 m)      | Inclination | 0º               | Installed power   | 7.5 kW (10 HP)          |           |                 |         |                  |                  |                 |
| Total length      | 82 ft (25 m)            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |              |                   |             |                  |                   |                         |           |                 |         |                  |                  |                 |
| Inclination       | 0º                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |              |                   |             |                  |                   |                         |           |                 |         |                  |                  |                 |
| Installed power   | 7.5 kW (10 HP)          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |              |                   |             |                  |                   |                         |           |                 |         |                  |                  |                 |
| 5.2.6             | 2                       | <p><b>Feeding system for Hammer Mill</b></p> <p><u>Vibratory feeder:</u></p> <table><tr><td>Width:</td><td>5.9 ft (1800 mm)</td></tr><tr><td>Length:</td><td>9.8 ft (3000 mm)</td></tr><tr><td>Drive (per unit):</td><td>2 x 2.5 HP (2 x 1.7 kW)</td></tr></table> <p>Canted and welded steel construction without cover.</p> <p>Driven by 2 maintenance-free vibration motors.</p> <p>Exit side conveyor trough of nonmagnetic VA steel if magnetic drum is used.</p> <p><u>Magnetic drum:</u></p> <table><tr><td>Diameter:</td><td>1.3 ft (406 mm)</td></tr><tr><td>Length:</td><td>6.4 ft (1965 mm)</td></tr><tr><td>Drive (per unit)</td><td>1.5 HP (1.1 kW)</td></tr></table> <p>Complete with clamp bearing, gear motor and dust hood.</p> <p><u>Support frame:</u></p> <p>For feeding system.</p> | Width:       | 5.9 ft (1800 mm)  | Length:     | 9.8 ft (3000 mm) | Drive (per unit): | 2 x 2.5 HP (2 x 1.7 kW) | Diameter: | 1.3 ft (406 mm) | Length: | 6.4 ft (1965 mm) | Drive (per unit) | 1.5 HP (1.1 kW) |
| Width:            | 5.9 ft (1800 mm)        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |              |                   |             |                  |                   |                         |           |                 |         |                  |                  |                 |
| Length:           | 9.8 ft (3000 mm)        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |              |                   |             |                  |                   |                         |           |                 |         |                  |                  |                 |
| Drive (per unit): | 2 x 2.5 HP (2 x 1.7 kW) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |              |                   |             |                  |                   |                         |           |                 |         |                  |                  |                 |
| Diameter:         | 1.3 ft (406 mm)         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |              |                   |             |                  |                   |                         |           |                 |         |                  |                  |                 |
| Length:           | 6.4 ft (1965 mm)        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |              |                   |             |                  |                   |                         |           |                 |         |                  |                  |                 |
| Drive (per unit)  | 1.5 HP (1.1 kW)         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |              |                   |             |                  |                   |                         |           |                 |         |                  |                  |                 |

| Pos                          | Units                      | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                |                            |                              |                  |             |                   |                    |               |
|------------------------------|----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|----------------------------|------------------------------|------------------|-------------|-------------------|--------------------|---------------|
| 5.2.7                        | 2                          | <p><b>Wet Hammer mill Type HH 600x2000</b></p> <p>Consisting of:</p> <p>Heavy particle separator type CLEANER, installed at the material infeed chute of the Hammer Mill.</p> <p>CLEANER housing with adjustable guide plates, and expansion room, 2 fans each 4 kW with compensator and blowing in channel.</p> <p><u>Hammer Mill type HH 600 x 2000.</u></p> <p>Direction of rotor rotation: right-handed or left-handed, reversible.</p> <p><u>Technical data:</u></p> <table><tr><td>Infeed opening</td><td>2 x 6.6 ft (600 x 2000 mm)</td></tr><tr><td>Rotor diameter</td><td>6.6 ft (2000 mm)</td></tr><tr><td>Motor power</td><td>670 HP (500 kW)</td></tr><tr><td>Self-propelled air</td><td>16 000 m³/h</td></tr></table> <p><u>Basic equipment:</u></p> <p>Vertical infeed.</p> <p>Infeed flap, adjustable to direct the material for right-handed or left-handed rotation, hydraulically.</p> <p>Three-part machine housing in welded steel construction.</p> <p>Machine sides folding away hydraulically.</p> <p>Screens and milling tracks integrated in side parts</p> <p>Milling tracks surface hardened</p> <p>Rotor in arc welded steel construction, dynamically balanced, with swinging hammers made out of special steel, pendulous suspended on hardened shafts.</p> <p>Hammers with 2 drill holes therefore all 4 edges can be used.</p> <p>V-belt pulley mounted at the rotor shaft.</p> <p>Zero-speed control (24 V DC) for rotor speed.</p> <p>Limit switch at the housing side parts.</p> <p>All electrical components wired on a conduit box.</p> | Infeed opening | 2 x 6.6 ft (600 x 2000 mm) | Rotor diameter               | 6.6 ft (2000 mm) | Motor power | 670 HP (500 kW)   | Self-propelled air | 16 000 m³/h   |
| Infeed opening               | 2 x 6.6 ft (600 x 2000 mm) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                |                            |                              |                  |             |                   |                    |               |
| Rotor diameter               | 6.6 ft (2000 mm)           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                |                            |                              |                  |             |                   |                    |               |
| Motor power                  | 670 HP (500 kW)            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                |                            |                              |                  |             |                   |                    |               |
| Self-propelled air           | 16 000 m³/h                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                |                            |                              |                  |             |                   |                    |               |
| 5.2.8                        | 2                          | <p><b>Dust extraction system for Hammer mill</b></p> <p>It includes:</p> <ul style="list-style-type: none"><li>- Piping and connection to machine.</li><li>- Cyclone separator complete with rotary valve and steel support:<table><tr><td>Air flow</td><td>Up to 16 000 m³/h</td></tr><tr><td>Installed power rotary valve</td><td>0.5 HP (0.37 kW)</td></tr></table></li><li>- Radial fan<table><tr><td>Air flow</td><td>Up to 16 000 m³/h</td></tr><tr><td>Installed power</td><td>50 HP (37 kW)</td></tr></table></li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Air flow       | Up to 16 000 m³/h          | Installed power rotary valve | 0.5 HP (0.37 kW) | Air flow    | Up to 16 000 m³/h | Installed power    | 50 HP (37 kW) |
| Air flow                     | Up to 16 000 m³/h          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                |                            |                              |                  |             |                   |                    |               |
| Installed power rotary valve | 0.5 HP (0.37 kW)           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                |                            |                              |                  |             |                   |                    |               |
| Air flow                     | Up to 16 000 m³/h          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                |                            |                              |                  |             |                   |                    |               |
| Installed power              | 50 HP (37 kW)              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                |                            |                              |                  |             |                   |                    |               |

| Pos    | Units | Description                                                                                                                                                                                                                                                                                                                                                                         |
|--------|-------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5.2.9  | 2     | <b>Screw conveyor</b><br>U-shaped conveyor trough of 5 mm bent steel plate, with bolted-on cover.<br>Auger (screw) of 8 mm steel plate, welded on center shaft. Center shaft with bolted, exchangeable shaft ends running in double-row spherical roller bearings.<br>Anti-clockwise rotating auger. Drive unit with hollow-shaft mounted flat gear of type Nord (standard) or SEW. |
| 5.2.10 | 1     | <b>Microchips chain conveyor</b><br>It collects the microchips produced in the two wet hammer mills and discharges it to the dryer feeding conveyors.<br>Supports included<br><u>Technical data:</u><br>Total length69 ft (21 m)<br>Inclination0º - 45º<br>Installed power11 kW (15 HP)                                                                                             |
| 5.2.11 | 1     | <b>Sawdust and shavings moving floor</b><br>It receives the sawdust and shavings from the client’s front end loader. Delimited by concrete walls (out of PRODESA’s supply)<br><u>Technical data:</u><br>Volume250 m³ (8,828 ft³)<br>Number of grates4<br>Hydraulic unit motors2 x 60 HP (2 x 45 kW)                                                                                 |
| 5.2.12 | 1     | <b>Disc screen feeding chain conveyor</b><br>It receives the product from the moving floor (pos 5.2.11) and feeds disc screen (pos 5.2.12)<br>Supports included.<br><u>Technical data:</u><br>Total length98.4 ft (30 m)<br>Inclination0º - 15º<br>Installed power11 kW (15 HP)                                                                                                     |
| 5.2.13 | 1     | <b>Disc screen</b><br>It receives the product from the previous conveyor (pos 5.2.12). To separate big pieces. The good product is discharged to a conveyor that feeds the dryer feeding system.<br>Driven by gearbox and chain transmission.<br>It includes the upper and lower hopper for connection with the previous and post chain conveyors.                                  |

| Pos             | Units            | Description                                                                                                                                                                                                                                                                                                                                                                               |              |                  |             |    |                 |                 |
|-----------------|------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|------------------|-------------|----|-----------------|-----------------|
| 5.2.14          | 1                | <p><b>Disc screen outlet chain conveyor</b></p> <p>It receives the product from the disc screen (pos 5.2.13) and discharges the dryer feeding system.</p> <p>Supports included.</p> <p><u>Technical data:</u></p> <table><tr><td>Total length</td><td>44.2 ft (13.5 m)</td></tr><tr><td>Inclination</td><td>0º</td></tr><tr><td>Installed power</td><td>5.5 kW (7.5 HP)</td></tr></table> | Total length | 44.2 ft (13.5 m) | Inclination | 0º | Installed power | 5.5 kW (7.5 HP) |
| Total length    | 44.2 ft (13.5 m) |                                                                                                                                                                                                                                                                                                                                                                                           |              |                  |             |    |                 |                 |
| Inclination     | 0º               |                                                                                                                                                                                                                                                                                                                                                                                           |              |                  |             |    |                 |                 |
| Installed power | 5.5 kW (7.5 HP)  |                                                                                                                                                                                                                                                                                                                                                                                           |              |                  |             |    |                 |                 |
| 5.2.15          | 1                | <p><b>Structures and painting</b></p> <p>Metal structures necessary for the support of described equipment, as well as access stairs and walkways required for the inspection and maintenance of the facility.</p> <p>All items (except stainless and galvanized steel) are supplied with a first coat of synthetic painting according to our standard RAL.</p>                           |              |                  |             |    |                 |                 |

| Pos.            | Units         | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |              |               |             |          |                 |               |
|-----------------|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|---------------|-------------|----------|-----------------|---------------|
| 5.3             |               | DRYER FEEDING SYSTEM                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |              |               |             |          |                 |               |
| 5.3.1           |               | <p><b>Wet product chain conveyor</b></p> <p>It receives the microchips from the wet hammer mills (pos.5.2.10) and the sawdust and shavings from the disc screen outlet conveyor (pos 5.2.14), and discharges it to the dryer feeding chain conveyor.</p> <p>Supports included.</p> <p><u>Technical data:</u></p> <table><tr><td>Total length</td><td>220 ft (67 m)</td></tr><tr><td>Inclination</td><td>0º - 45º</td></tr><tr><td>Installed power</td><td>37 kW (50 HP)</td></tr></table> | Total length | 220 ft (67 m) | Inclination | 0º - 45º | Installed power | 37 kW (50 HP) |
| Total length    | 220 ft (67 m) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |              |               |             |          |                 |               |
| Inclination     | 0º - 45º      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |              |               |             |          |                 |               |
| Installed power | 37 kW (50 HP) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |              |               |             |          |                 |               |
| 5.3.2           | 1             | <p><b>Dryer feeding chain conveyor</b></p> <p>It receives the product from the previous chain conveyor (pos 5.3.1) and feeds the dryer dosing bin</p> <p>Supports included</p> <p><u>Technical data:</u></p> <table><tr><td>Total length</td><td>207 ft (63 m)</td></tr><tr><td>Inclination</td><td>20º</td></tr><tr><td>Installed power</td><td>45 kW (60 HP)</td></tr></table>                                                                                                          | Total length | 207 ft (63 m) | Inclination | 20º      | Installed power | 45 kW (60 HP) |
| Total length    | 207 ft (63 m) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |              |               |             |          |                 |               |
| Inclination     | 20º           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |              |               |             |          |                 |               |
| Installed power | 45 kW (60 HP) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |              |               |             |          |                 |               |
| 5.3.3           |               | <p><b>Structures and painting</b></p> <p>Metal structures necessary for the support of described equipment, as well as access stairs and walkways required for the inspection and maintenance of the facility.</p> <p>All items (except stainless and galvanized steel) are supplied with a first coat of synthetic painting according to our standard RAL.</p>                                                                                                                           |              |               |             |          |                 |               |

| Pos   | Units | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5.4   | 1     | <b>Drying Island: DRUM DRYER</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 5.4.1 | 1     | <b>Hot Gas Isolation Gate</b><br><br>The Hot Gas Isolation Gate is bolted between the Heat Energy System and Recycle Bustle. This gate enables plant personnel to seal off the Dryer System from the hot gasses generated by the Heat Energy System.<br><br>When activated, to hold back gasses generated by the Heat Energy System from entering the Dryer System, and thus provide safe passage for plant maintenance personnel into the Dryer System.<br><br><u>Technical data:</u><br><br>Housing material3/8” thick A36 mild steel<br>Gate material12 mm thick 304 SS<br>ActuatorTwin hydraulic cyclinders |
| 5.4.2 | 1     | <b>Recycle system</b><br><br>To control the flow of Dryer System flue gas back to the Dryer System via the Recycle Bustle.<br><br>The Recycle System consists of gas ductwork that runs from the discharge of the Dryer System’s ID Fan to the Recycle Bustle; the Recycle Bustle is located between the Burner and the Dryer Drum. Within this ductwork is a Recycle Damper that controls the amount of flue gas recycled.                                                                                                                                                                                     |
| 5.4.3 | 1     | <b>Recycle bustle</b><br><br>To accept recycled gas from the Dryer Exhaust System and blend it back into the incoming hot gas stream generated by the Heat Energy System.                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 5.4.4 | 1     | <b>Inlet fitting</b><br><br>To act as a conduit for the transition of the homogeneous drying gas from the Recycle Bustle into the Dryer Drum and for the introduction of the wet woody biomass to be dried into the Dryer Drum                                                                                                                                                                                                                                                                                                                                                                                  |
| 5.4.5 | 1     | <b>Purge Fan</b><br><br>To purge the Dryer System clean of combustible gas to prevent explosions from occurring within the Dryer System                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 5.4.6 | 1     | <b>Metering Bin</b><br><br>To receive the wet material from the chain conveyor pos 5.3.2, store it and meter it to the infeed airlock.<br><br>The Metering Bin is located above the Infeed Airlock. The Metering Bin contains augers at bin bottom that are driven by a Variable Frequency Drives.                                                                                                                                                                                                                                                                                                              |

| Pos          | Units    | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|--------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|              |          | <p>The augers feed/meter the product to the infeed airlock. Above the auger there is an agitator that distributes the product evenly across the augers to ensure proper and constant feed of the augers.</p> <p><u>Technical data:</u></p> <p>Capacity: Approx 30 minutes</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>5.4.7</b> | <b>1</b> | <p><b>Infeed Airlock</b></p> <p>To receive wet material from the Metering Bin and discharge it onto the louvered chute of the Inlet Fitting.</p> <p>The Infeed Airlock comprises a formed machined steel body with a rotating vane. The vane has eight pockets with knife tips. The design loading is based on achieving the optimum balance between minimizing the introduction of ambient air into the system and creating a maximum, nonplugging load in each pocket.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>5.4.8</b> | <b>1</b> | <p><b>Rotary drum</b></p> <p>The Drum assembly consists of three major subassemblies: the Drum, the trunnion assemblies, and the drive.</p> <p>The Drum is a cylindrical structure formed of rolled mild steel plate, reinforced with structural section channel, tee, and angle ribs, and external bands. The Drum rides on two full diameter forged tracks. The Drum's interior is a network of lifting flights and baffles, designed to shower material across the Drum's cross-section as it rotates and to regulate the forward movement of material through the Drum. Around the circumference of the Drum are mounted segmented chain teeth sets, on which a roller chain rides. Drum rotation is effected by an electric motor and a gear reducer.</p> <p>The Drum's tires are supported on four trunnion wheels, arranged in opposed pairs at the two track locations. Each trunnion is cast and machined from nodular iron, with shafts riding in split pillow-block spherical roller bearings. Rear trunnion Wheels are flanged to fix the location of the Drum.</p> <p>Seals are located at both ends of the drum and are designed to limit ambient air infiltration. Seals are mounted to adapter-taper fittings to insure alignment. Drive chain, trunnions wheels, and tracks are lubricated by Molybdenum Blocks. The Drum is clad with a corrugated skin held in place with stainless steel bands. This creates an air gap which acts as insulation.</p> <p><u>Technical data:</u></p> <p>Length: 90'</p> <p>Diameter: 20'</p> |

| Pos           | Units    | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|---------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>5.4.9</b>  | <b>1</b> | <p><b>Ductwork</b></p> <p>To convey dried biomass and spent gas from the Drum discharge to the High Efficiency Cyclone, and to convey spent gas from the High Efficiency Cyclone discharge to the ID Fan, and from the ID Fan either to the Recycle Bustle and Emission Control Equipment.</p> <p>The Ductwork is made from rolled mild steel. There are essentially two types of Duct in the system: Material Duct that conveys both spent gas and entrained particulate and Gas Duct that conveys spent gas only.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>5.4.10</b> | <b>1</b> | <p><b>Double-Duct</b></p> <p>To keep inner walls of the ductwork after material separating Cyclones hotter than the condensable temperature of the complex hydrocarbons that evaporate from woody biomass during the drying process thus prevent ‘pitch’ buildup</p> <p>Double-Duct encompasses the duct from Cyclone discharge to the ID Fan inlet; it also encompasses the recycle duct, which runs from ID Fan to the Recycle Bustle, and duct from ID Fan to WESP’s Quench Duct.</p> <p>Double-Duct is heated via natural gas burners.</p> <p>Sole purpose of the Double-Duct is to keep the inner walls of the process duct (process duct processes Dryer System flue gas) hotter than the condensable temperature of complex hydrocarbons that evaporate from woody biomass during the drying process. This prevents hydrocarbons from condensing onto inner walls of the process duct, which is commonly in the industry referred as ‘pitch’ buildup. Pitch buildup is prone to fires, explosions, and while it accumulates it slowly reduces production capacity of the Dryer Island due to restricting air flow. It is very costly and time consuming to manually clean ‘pitch’ buildup.</p> |
| <b>5.4.11</b> | <b>2</b> | <p><b>High efficiency cyclones</b></p> <p>To separate dried biomass from the spent gas and deliver it into the Cyclone Airlock.</p> <p>High Efficiency Cyclone accepts spent gas and dried material from the incoming Material Duct. The inlet geometry features a tangential transition to the tub section with inlet angle between Material Duct and transition of fifteen degrees. The cone section is a relatively shallow angle for better efficiency at removing smaller particulate from the gas stream. At the exit to the cone there is an oversized Vortex Breaker with anti-spin baffles to effectively stop the cyclonic action of the material and to evenly distribute it into the Cyclone Airlock pockets minimizing the risk of plugging and wear on the tips of the Airlock. Spent gas is drawn from the top of the Cyclones into the Gas Duct. Explosion relief panels are located on top of the Cyclone.</p>                                                                                                                                                                                                                                                                       |



| Pos          | Units                                              | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |       |                                                    |              |         |        |           |         |                          |
|--------------|----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|----------------------------------------------------|--------------|---------|--------|-----------|---------|--------------------------|
| 5.4.12       | 2                                                  | <p><b>Cyclone Airlock</b></p> <p>To receive dried biomass from the High Efficiency Cyclone and discharge dried biomass to Collection Screw(s). High Efficiency</p> <p>The Cyclone Airlock comprises a formed machined steel body with a rotating vane. The vane has eight pockets with knife tips. The design loading is based on achieving the optimum balance between minimizing the introduction of ambient air into the system and creating a maximum, nonplugging load in each pocket</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |       |                                                    |              |         |        |           |         |                          |
| 5.4.13       | 1                                                  | <p><b>Collection screw</b></p> <p>To collect dried material from the Cyclone Airlocks, and process dried material to the dry product chain conveyor or to client’s Fire Dump.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |       |                                                    |              |         |        |           |         |                          |
| 5.4.14       | 1                                                  | <p><b>ID Fan</b></p> <p>To provide the motive force and requisite pressures through the Dryer System.</p> <p>The ID Fan is positioned at grade level after the High Efficiency Cyclone and connects to Gas Ductwork on both the inlet and the outlet sides. It draws gas through the entire Dryer System prior to the inlet and then forces some gas back into the Dryer System via the Recycle Bustle and the reminder of the gas to the WESP.</p> <p>There are expansion joints located at both the inlet and the outlet of the ID Fan that accommodate for the thermal expansion of the Gas Ductwork, but also isolate the Ductwork from any potential vibrations originating with the ID Fan.</p> <p>The ID Fan flow is modulated via a Variable Frequency Drive and it is governed by the pressure differential reading across the High Efficiency Cyclones</p> <p><u>Technical data:</u></p> <table><tr><td>Type:</td><td>Single wheel, double inlet, centrifugal, class IV.</td></tr><tr><td>Blade Shape:</td><td>Radial.</td></tr><tr><td>Speed:</td><td>1,200 rpm</td></tr><tr><td>Access:</td><td>Man door for maintenance</td></tr></table> | Type: | Single wheel, double inlet, centrifugal, class IV. | Blade Shape: | Radial. | Speed: | 1,200 rpm | Access: | Man door for maintenance |
| Type:        | Single wheel, double inlet, centrifugal, class IV. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |       |                                                    |              |         |        |           |         |                          |
| Blade Shape: | Radial.                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |       |                                                    |              |         |        |           |         |                          |
| Speed:       | 1,200 rpm                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |       |                                                    |              |         |        |           |         |                          |
| Access:      | Man door for maintenance                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |       |                                                    |              |         |        |           |         |                          |
| 5.4.15       | 1                                                  | <p><b>Recycle &amp; Stack Dumper</b></p> <p>To control the flow of gas to the Recycle Bustle or to the Pollution Control Equipment.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |       |                                                    |              |         |        |           |         |                          |

| Pos      | Units                   | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |        |                         |          |     |
|----------|-------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------------------|----------|-----|
| 5.4.16   | 1                       | <p><b>Emergency Abort Stack</b></p> <p>To vent Dryer System gasses to atmosphere during upset operating conditions</p> <p>At times the Dryer System flue gas will need to be aborted to atmosphere during upset operating conditions; rather than sending these flue gasses to the Pollution Control Equipment or to the Heat Energy System.</p> <p>The Emergency Abort Stack provides the ability to vent gases to atmosphere during upset operating conditions. The control damper is air actuated and is fail safe; if there is a power outage or air failure the Emergency Abort Stack will automatically open.</p> <p><u>Technical data:</u></p> <table><tr><td>Height</td><td>Approx. 65' above grade</td></tr><tr><td>Diameter</td><td>50"</td></tr></table> | Height | Approx. 65' above grade | Diameter | 50" |
| Height   | Approx. 65' above grade |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |        |                         |          |     |
| Diameter | 50"                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |        |                         |          |     |
| 5.4.17   | 1                       | <p><b>Dryer System Control Devices</b></p> <p>The following devices are included in order to control the Dryer System via PLC:</p> <ul style="list-style-type: none"><li>• Temperature Control Sensors</li><li>• Temperature Transmitters</li><li>• Pressure Transmitters</li><li>• Speed Switches</li><li>• Proximity Switches (Capacitive and Inductive)</li><li>• Plug Detectors</li><li>• Deluge Nozzles</li></ul>                                                                                                                                                                                                                                                                                                                                              |        |                         |          |     |
| 5.4.18   | 1                       | <p><b>Spark detection and suppression</b></p> <p>To monitor the Dryer System for sparks and fires, and extinguish those sparks and fires.</p> <p>The Spark Detection and Suppression monitors various locations within the Dryer. System. Deluge nozzles are linked to the spark detection devices and respond appropriately based on input. The deluge works in conjunction with the Diverter Gate to abort material to the Buyer's Fire Dump.</p> <p>The Spark Detection and Suppression is integrated into the overall Dryer System controls with audible fire alarm, control panel display, and fire sequence relay.</p>                                                                                                                                        |        |                         |          |     |
| 5.4.19   | 1                       | <p><b>Structures, supports and platforms</b></p> <p>All the metallic structures for the sustentation of the described equipment, the access ladders and platforms and passage ways needed for the correct inspection and maintenance of the installation.</p> <p>All the equipment (except those in inox steel) are supplied with a layer of epoxy covered by a layer of synthetic paint, according with our standard RAL.</p>                                                                                                                                                                                                                                                                                                                                      |        |                         |          |     |

| Pos   | Units | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-------|-------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5.5   | 1     | <b>Drying Island: HEAT ENERGY SYSTEM</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 5.5.1 | 1     | <b>Fuel moving floor</b><br>It receives the biomass used as fuel from the client’s front end loader.<br>Delimited by concrete walls (out of PRODESA’s supply)<br><u>Technical data:</u><br>Volume250 m³ 8,828 ft³)<br>Number of grates4<br>Hydraulic unit motors2 x 60 HP (2 x 45 kW)                                                                                                                                                                                                                                                                                                                            |
| 5.5.2 | 1     | <b>Fuel feeding chain conveyor</b><br>It receives the biomass from the fuel moving floor (pos 5.5.1) and discharges it into the furnace flop gate (pos 5.5.3)<br><u>Technical data:</u><br>Total length171 ft (52 m)<br>Inclination20º<br>Installed power11 kW (15 HP)                                                                                                                                                                                                                                                                                                                                           |
| 5.5.3 | 1     | <b>Flop Gate</b><br>The Flop Gate provides isolation of the fuel feed system from the Fuel Feed Conveyor.<br>The Flop Gate only opens when the Furnace is calling for fuel based on low level sensor located in the Metering Bin. The Flop Gate blocks air (oxygen) from getting inside the Metering Bin during fuel feed upsets or when shutting down a Furnace which contributes to fires                                                                                                                                                                                                                      |
| 5.5.4 | 1     | <b>Reversing screw</b><br>The Reversing Screw is located directly above the Metering Bin and directs fuel to both sides of the Metering Bin, thus ensuring even fuel distribution within the Metering Bin.<br>It provides for even fuel feed into the Furnace from the Metering Bin. The motor driving the screw is a reversing motor.                                                                                                                                                                                                                                                                           |
| 5.5.5 | 1     | <b>Metering bin</b><br>The Metering Bin consists of fuel feed pushers that push fuel onto the Combustion Chamber’s grates, and cover the entire grate area with fuel at a controlled fuel bed level.<br>The complete grate area forms an active drying and combustion area. A double alarm system (level control furnace and level control fuel feeders) warns operator in case of interruptions of fuel supply. A gate valve and sprinkler system are installed for prevention of back burning into the Metering Bin.<br>The Metering Bin provides approximately fifteen (15) minutes of fuel storage capacity. |

| Pos           | Units    | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>5.5.6</b>  | <b>1</b> | <p><b>Reciprocating Grate Combustion Chamber</b></p> <p>The Combustion Chamber constructed of a robust steel frame structure with moving and stationary grate frames. Reciprocating grate bars are carried by moving support frames. Stationary grate bars are supported by the structure frame. The Reciprocating Grate frames and grate bars are supported on ball bearings. There are four (4) zones of moving grates within the Furnace.</p> <p>The grate bars are of high heat resistant alloy with cooling fins to prevent overheating; water cooling is not required. The grate bars are overlapping, thus preventing through fall of unburned fuel. A hydraulic power pack with pump operates the fuel feeders and grates.</p> <p>The primary combustion air enters the fuel bed from the under-fire air zone through slots between the grate bars. The sides of the grate's assembly are cast steel side bars to protect the refractory of the furnace from abrasion by the moving grate bars.</p> <p>The reciprocating grate bars are activated by hydraulic cylinders. The relative movement between stationary and moving grate bars causes the fuel to continually turn and convey along the grate to enhance the combustion process.</p> |
| <b>5.5.7</b>  | <b>1</b> | <p><b>Hydraulic Power Pack</b></p> <p>Hydraulics for ram feeder, shut off slide, grate cylinders, and the last grate section.</p> <p>Hydraulic Power Pack unit complete with one high-capacity hydraulic pump, complete with coupling, guard, three 4-way directional solenoid valves, tank trim, all components pre-piped, and mounted on a rigid tank.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>5.5.8</b>  | <b>1</b> | <p><b>Hydraulic Displacement Pumps</b></p> <p>Hydraulic Displacement Pumps operate all four (4) grate sections of the Furnace and control the speed of the strokes based on firing rate and controlling the speed of the pumps. Each pump motor requires a variable frequency drive.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>5.5.9</b>  | <b>1</b> | <p><b>Primary Air Fan</b></p> <p>Forced draft fan with flanged inlet and outlet, inlet vane control damper, electric actuator with linkage and mounting bracket.</p> <p>The Primary Air Fan provides the primary combustion air into the under-fire air zones. Air is fed from under the grate bars and is controllable in each of the four sections</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>5.5.10</b> | <b>1</b> | <p><b>Secondary Air Fan</b></p> <p>Secondary Air Fan is a forced draft fan with flanged inlet and outlet, inlet vane control damper, electric actuator with linkage and mounting bracket.</p> <p>The Secondary Air Fan feeds the air over the fuel pile for complete combustion of fuel.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

| Pos           | Units    | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>5.5.11</b> | <b>1</b> | <b>Furnace Casing and Combustion Air Ducts</b><br>Carbon steel construction for the complete chamber with external stiffening beams. Ducting for the Primary and Secondary Air Fans from the fans to the Furnace air boxes and headers.                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>5.5.12</b> | <b>1</b> | <b>Secondary Combustion and Dropout Chamber</b><br>This chamber provides final combustion of the gases from the Furnace.<br>The chamber also provides for mixing of the furnace gas with the Dryer System flue gas. After mixing and blending, the gases are discharged to the Dryer ducting.<br>The Chamber is refractory lined and includes a dropout chamber and flue gas turn around design for maximum removal of fly ash in front of the Dryer.<br>The chamber is designed with the top as a secondary combustion chamber to burn-out the carry over and the bottom as an ash drop-out in order to get clean burned out gas that can be directly fed into the dryer. |
| <b>5.5.13</b> | <b>1</b> | <b>Refractory</b><br>Internal refractory block insulation rated to 1900°F. Furnace material is plastic rated to 2700°F. Using low cement materials and installation to be done using shot-crete method. To be blown-in-place on site.                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>5.5.14</b> | <b>1</b> | <b>Submerged Ash Conveyor</b><br>Submerged Ash Conveyor of drag chain design, complete with gearbox and drive, collects ash from underneath the Furnace grate. Submerged Ash Conveyor provides an air lock for the Furnace ash hoppers                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>5.5.15</b> | <b>1</b> | <b>Emergency Exhaust Stack</b><br>Mounted on top of the Furnace and includes automatic hydraulic damper.<br>The purpose of the Emergency Stack is to open at high temperature and/or high pressure in the system and at power failures.<br>It is fabricated from mild steel and refractory-lined for the first 5 feet above the furnace roof. The remainder of the stack is made of stainless steel and includes one pneumatically operated damper on top as a stack cap. Stack cap is made of stainless steel and also has refractory lining.<br><u>Technical data:</u><br>Height <span style="float: right;">Approx. 50 ft above grade</span>                            |
| <b>5.5.16</b> | <b>1</b> | <b>Video Camera and Monitor</b><br>One (1) air-cooled video cameras are provided at the rear end of the Furnace with one (1) monitors to allow for visual inspection of the furnace combustion process from the operator room.<br>The video monitors will be located in the operator control room                                                                                                                                                                                                                                                                                                                                                                          |

| Pos           | Units    | Description                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>5.5.17</b> | <b>1</b> | <b>Heat Energy System Control Devices</b><br>The following devices are included in order to control the Heat Energy System via PLC: <ul style="list-style-type: none"> <li>• Temperature Control Sensors</li> <li>• Temperature Transmitters</li> <li>• Zero Speed Switches</li> <li>• Pressure Transmitters</li> <li>• Proximity Switches (Capacitive and Inductive)</li> <li>• Level Indicators</li> <li>• Deluge Nozzles</li> </ul> |
| <b>5.5.18</b> | <b>1</b> | <b>Structures, supports and platforms</b><br>All the metallic structures for the sustentation of the described equipment, the access ladders and platforms and passage ways needed for the correct inspection and maintenance of the installation.<br>All the equipment (except those in inox steel) are supplied with a layer of epoxy covered by a layer of synthetic paint, according with our standard RAL                         |

| Pos          | Units    | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|--------------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>5.6</b>   | <b>1</b> | <b>Drying Island: WET ELECTROSTATIC PRECIPITATOR (WESP)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>5.6.1</b> | <b>1</b> | <b>Inlet Quench Duct</b><br>The Inlet Quench Duct is equipped with recycled water sprays to saturate the gas stream and also scrub out the large particulate present in the exhaust gas. The Inlet Quench Duct attaches to the corresponding                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>5.6.2</b> | <b>1</b> | <b>Wet Electrostatic Precipitator (WESP)</b><br>One Complete WESP unit will be provided. The unit will be complete with collecting electrodes, discharge electrodes, and a suspended power grid<br><u>Technical data:</u><br>Design Pressure ± 25 IWC (0.06 bar)<br>Collection Electrodes 304L SS<br>Discharge Electrodes 304L SS<br>Collection Section Housing 304L SS tubes and tube sheets<br>A36 CS steel structural supports<br>A36 CS partical external skin                                                                                                                                                                                                          |
| <b>5.6.3</b> | <b>1</b> | <b>Quench Water Recycle</b><br>The Quench Water Recycle will include a common recycle tank with one (1) recycle pump.<br>Recycle water is sprayed into the quench duct and spent recycle water will gravity drain into the recycle tank located beneath the WESP.<br>The Quench Water Recycle will be controlled automatically by the PLC control system. Make up water requirements due to evaporation or blow down will be satisfied with flush water or on demand by level control<br><u>Technical data:</u><br>Recycle Tank capacity 20,000 gallons (75 m3)<br>Recycle Pumps capacity 2,500 gallon/min (9,375 l/min)                                                    |
| <b>5.6.4</b> | <b>1</b> | <b>Decanter Centrifuge</b><br>The Decanter Centrifuge removes solids collected by the Wet ESP and is required for the system.<br>The Decanter Centrifuge is configured to treat a slipstream of up to 50 gallons per minute (187.5 liters/minute) of recycle water from the Wet ESP.<br>The cake produced by the Decanter Centrifuge will be approximately 50% solids by weight and, depending on the nature of the solids, can be burned in the Reciprocating Step-Grate Furnace or sent to landfill.<br>The centrate (cleaned water) will gravity drain back to the recycle tank. A small blow-down stream of approximately 2 gallons per minute (7.5 liters/minute) will |

| Pos          | Units    | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|--------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|              |          | also be necessary to control dissolved solids. The exact amount will be determined after start up based on dissolved solids level..                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>5.6.5</b> | <b>1</b> | <p><b>Chemical Injection</b></p> <p>The Chemical Injection is incorporated into the flush and recycle systems. This system is designed to periodically inject sodium hydroxide (NaOH) directly into the flush water to aid in cleaning of the Wet ESP collection tubes. The flush and caustic systems will be controlled by the Dryer Island PLC.</p> <p>The Chemical Injection is also designed to inject a de-foaming agent into the water recirculation system to control foam when it occurs. The de-foaming system will be controlled at the PLC and also have the capability for manual control. The caustic and de-foaming system will be enclosed in a containment area. It is recommended that the entire system be insulated and heat traced.</p> |
| <b>5.6.6</b> | <b>1</b> | <p><b>High Voltage Power Supply</b></p> <p>Type: 3 phase, air cooled.</p> <p>T/R: NEMA 4.</p> <p>Control Panel: NEMA 1 to be located in MCC</p> <p>Output Rating: 70 kilovolt, 1500 milliamp.</p> <p>Input Power: 105 KVA, 460 V / 3-phase / 60 Hz.</p> <p>High Voltage Transmission: Pipe in grounded duct.</p> <p>Features: Control Panel with digital controller, KV and MA signal transmitters; remote start/stop function; grounding switch; key interlock system.</p>                                                                                                                                                                                                                                                                                 |
| <b>5.6.7</b> | <b>1</b> | <p><b>Purge Air</b></p> <p>Purge Air will provide clean, warm air to all support insulators to prevent fouling by process gas.</p> <p>The Purge Air System will also be equipped with a ducting network that uses the tube bundle for pre-heating the air</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>5.6.8</b> | <b>1</b> | <p><b>Flush System</b></p> <p>Type: Intermittent sprays.</p> <p>Flushed Areas: Collection sections (tubes and probes) plus mist eliminator.</p> <p>Features: All required nozzles and internal headers are provided. One feed system consisting of heated flush tank immersed in the recycle water for heat transfer purposes and a pump will be supplied. Hot water with caustic added is much more effective in removing sticky organic deposits from the collection tubes than cold water</p>                                                                                                                                                                                                                                                            |



| Pos    | Units | Description                                                                                                                                                                                                                                                                                                                                                                                                    |
|--------|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5.6.9  | 1     | <b>Control Devices</b><br>The following devices are included in order to control the WESP via PLC: <ul style="list-style-type: none"> <li>• Temperature Control Sensors</li> <li>• Temperature Transmitters</li> <li>• Zero Speed Switches</li> <li>• Pressure Transmitters</li> <li>• Proximity Switches (Capacitive and Inductive)</li> <li>• Level Indicators</li> <li>• PH Level Indicators</li> </ul>     |
| 5.6.10 |       | <b>Structures, supports and platforms</b><br>All the metallic structures for the sustentation of the described equipment, the access ladders and platforms and passage ways needed for the correct inspection and maintenance of the installation.<br>All the equipment (except those in inox steel) are supplied with a layer of epoxy covered by a layer of synthetic paint, according with our standard RAL |

| Pos          | Units    | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>5.7</b>   | <b>1</b> | <b>Drying Island: REGENERATIVE THERMAL OXIDIZER (RTO)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>5.7.1</b> | <b>1</b> | <b>Inlet manifold</b><br>Materials of Construction: Type 304L stainless steel, with minimum 10-gauge thickness, adequately stiffened to withstand maximum internal pressures.<br>Operational Parameters: $\pm 25$ IWC; 176°F (0.06 bar @ 80°C).<br>Access: One access door for internal inspection of inlet manifold                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>5.7.2</b> | <b>1</b> | <b>Diverter Valves</b><br>Materials of Construction: Type 304L stainless steel 3/16 in. thick and adequately stiffened to withstand maximum internal pressures.<br>Operational Parameters: $\pm 25$ IWC; 176°F (0.06 bar @ 80°C) inlet and 209°F outlet (98°C); maximum operational temperature is 600°F (316°C) during bake-out, and occurrence is for duration of 15-minute intervals. Valve Trim Construction: Main disk 3/16-inch-thick, Type 2101 duplex stainless steel; support disks 3/16-inch-thick Type 304L stainless steel. Seat materials are Type 304L stainless steel. Seal arrangement is metal to metal sealing surfaces without elastomeric compounds that would damage during bake-out.<br>Access: One access door for internal inspection.<br>Valve Actuation System: Parker 2A heavy duty pneumatic cylinder, adjustable end cushions at each end of travel; direct link with Parker linear alignment coupling, inductive proximity switches measuring actual valve shaft position, actuation time is 0.5 seconds full open to full close; the assembly is pre-assembled and pre-wired to junction box. |
| <b>5.7.3</b> | <b>1</b> | <b>Hopper Transitions</b><br>Materials of Construction: Type 304 stainless steel 3/16-inch-thick and adequately stiffened to withstand maximum internal pressures.<br>Operational Parameters: $\pm 25$ IWC; 176°F (0.06 bar @ 80°C) inlet and 209°C outlet (98°C); maximum operational temperature is 600°F (316°C) during bake-out.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>5.7.4</b> | <b>1</b> | <b>Heat Recovery Sections</b><br>Materials of Construction: Type 304L stainless steel 3/16-inch-thick and adequately stiffened to withstand maximum internal pressures<br>Operational Parameters: $\pm 25$ IWC (0.06 bar); 176°F (80°C) inlet and 1500°F outlet (816°C); maximum operational temperature 1800°F (982°C) at top and 1100°F (593°C) at bottom.<br>Media Support Structure: Type 304 stainless steel structure with laser cut slotted plate; maximum design temperature of 1100°F (593°C); maximum free passage of 70% open area; centered in heat recovery chamber with no direct contact to outside walls; both ends floating to allow for thermal expansion.                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

| Pos           | Units    | Description                                                                                                                                                                                                                                                                                                                                                                                                                         |
|---------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               |          | Access: Inspection access to the support structures is through the diverter valve; inspection access to top of heat recovery section is through combustion chamber access.                                                                                                                                                                                                                                                          |
| <b>5.7.5</b>  | <b>1</b> | <b>Combustion Chamber</b><br>Materials of Construction: Type 304L stainless steel 3/16-inch-thick and adequately stiffened to withstand maximum internal pressures.<br>Operational Parameters: $\pm 25$ IWC (0.06 bar); normal operation 1500°F (816°C); maximum operational temperature 1800°F (982°C).<br>Access: One access door in the combustion chamber                                                                       |
| <b>5.7.6</b>  | <b>1</b> | <b>Outlet Manifolds</b><br>Materials of Construction: A36 carbon steel, 1/4" thick and adequately stiffened to withstand maximum internal pressures.<br>Operational Parameters: $\pm 25$ IWC (0.06 bar); 204°F (96°C) normal operating temperature; maximum operational temperature is 800°F (427°C) during bake-out and occurrence is for a duration of 15 minutes intervals.<br>Access: One (1) man door for internal inspection. |
| <b>5.7.7</b>  | <b>1</b> | <b>Process Dampers</b><br>Materials of Construction: Type 304L stainless steel for inlet side of RTO and A36 for discharge side of RTO.<br>Type: Butterfly with tadpole seats.                                                                                                                                                                                                                                                      |
| <b>5.7.8</b>  | <b>1</b> | <b>ID Fan</b><br>Temperature: 450°F design temperature (232°C).<br>Static Pressure: 25 IWC (0.06 bar); includes additional pressure with 2 IWC (0.005 bar) for incoming duct loss                                                                                                                                                                                                                                                   |
| <b>5.7.9</b>  | <b>1</b> | <b>Exhaust Stack</b><br>Materials of Construction: A36 carbon steel.<br>Height: 50' above grade.<br>Features: Sampling platform per specifications, ladder from grade to platform, free standing                                                                                                                                                                                                                                    |
| <b>5.7.10</b> | <b>1</b> | <b>Internal Ceramic Refractory</b><br>Heat Recovery Sections: Minimum 6" thick 8 lb density (15.24 cm thick @ 3.64 kg density).<br>Combustion Chamber: Minimum 8" thick 8 lb density (20.32 cm thick @ 3.64 kg density).<br>Type: Unifrax or approved equal; Anchor-Loc spun fiber ceramic modules.<br>Attachment Method: Welded/threaded stud, Stainless steel.                                                                    |

| Pos           | Units    | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               |          | <p>Combustion Chamber Temperature: 1550°F (843°C).</p> <p>Maximum Internal Temperature: 2200°F (1204°C).</p> <p>External Skin Temperature: Less than 150°F (66°C) at 70°F (21°C) with 5 mph (8 km/hr) wind.</p>                                                                                                                                                                                                                                                                                                                                            |
| <b>5.7.11</b> | <b>1</b> | <p><b>Heat Recovery Media</b></p> <p>Type: MLM structured media by Lantec or equal.</p> <p>Thermal Efficiency: 96.5% TE.</p>                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>5.7.12</b> | <b>1</b> | <p><b>Burner System</b></p> <p>Type: Maxon Kinemax.</p> <p>Size: 8 mmBTU/hr each (8.44 Gj). (Total RTO rating)</p> <p>Quantity: Six (6) burners.</p> <p>Features: Maxon series 5000 blocking valves, Honeywell C6097 A series pressure switches, Actarus B 38 R pressure regulators, Maxon MicroRatio series air/gas proportioning valves, combustion blower, Honeywell RM 7800L flame supervisory system, Honeywell C7061 A self-checking flame scanner, and Honeywell UDC 2500 over temperature control; supplied pre-piped, pre-wired, skid mounted</p> |
| <b>5.7.13</b> | <b>1</b> | <p><b>RTO Control Devices</b></p> <p>The following devices are included in order to control the RTO via PLC:</p> <ul style="list-style-type: none"> <li>• Temperature Control Sensors</li> <li>• Temperature Transmitters</li> <li>• Zero Speed Switches</li> <li>• Pressure Transmitters</li> <li>• Proximity Switches (Capacitive and Inductive)</li> <li>• Flame Scanner(s)</li> </ul>                                                                                                                                                                  |
| <b>5.7.14</b> | <b>1</b> | <p><b>Structures, supports and platforms</b></p> <p>All the metallic structures for the sustentation of the described equipment, the access ladders and platforms and passage ways needed for the correct inspection and maintenance of the installation.</p> <p>All the equipment (except those in inox steel) are supplied with a layer of epoxy covered by a layer of synthetic paint, according with our standard RAL</p>                                                                                                                              |


| Pos        | Units    | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|------------|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>5.8</b> | <b>1</b> | <b>Drying Island: REFRACTORY WORKS</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|            |          | <p>Supply all manpower, lifting and hoisting equipment, and travel and living expenses, to install the refractory on the Heat Energy System and connecting hot gas ductwork between the Heat Energy System and Dryer Drum.</p> <p>It includes:</p> <ol style="list-style-type: none"> <li>1) Heat Energy System refractory supply.</li> <li>2) Heat Energy System refractory anchors supply.</li> <li>3) Dryer System's hot gas ductwork refractory supply.</li> <li>4) Dryer System's hot gas ductwork refractory anchor supply.</li> <li>5) Heat Energy System anchor and refractory installation.</li> <li>6) Dryer System hot gas ductwork anchor and refractory installation.</li> <li>7) Heat Energy System refractory cure-out.</li> <li>8) Dryer System refractory cure-out.</li> <li>9) Refractory installation/cure-out 3rd party inspection.</li> <li>10) Confined space area attendants and monitors.</li> </ol> |

| Pos.  | Units | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-------|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5.9   |       | <b>DRY PRODUCT STORAGE</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 5.9.1 | 1     | <b>Chain conveyor</b><br>Moves the dry product from the dryer to the intermediate storage silo.<br><u>Technical data:</u><br>Length154 ft (47 m)<br>Inclination22°<br>Installed power18.5 kW (25 HP)<br>MaterialSS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 5.9.2 | 1     | <b>Screw conveyor</b><br>It receives the dry product from the previous chain conveyor (pos 5.9.1) and discharges it into the dry product silo. It includes a second outlet as emergency exit..<br><u>Technical data:</u><br>Length21 ft (6.5 m)<br>Inclination0°<br>Installed power7.5 kW (10 HP)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 5.9.3 |       | <b>Intermediate storage vertical silo</b><br><u>VERTICAL SILO:</u> Bolted carbon and carbon steel construction, delivered in prefabricated segments or parts for assembling on site.<br>It consists of: <ul style="list-style-type: none"><li>• Interior floor assembly with all assembling and connection openings</li><li>• 4' x 4' opening in skirt as outlet for process conveyor</li><li>• 4' x 4' opening in skirt as outlet for dump conveyor1</li><li>• 6' x 6'-8" Double Walk-Through Door in silo skirt1</li><li>• 36" x 48" maintenance opening at level of product floor</li><li>• 4'-6" x 4'-6" exterior platform at level of product floor with access ladder and fall protection system</li><li>• 1 set of explosion vents arranged underneath eave</li><li>• 4 x eave mounted conveyor support columns, designed for max 10 kip vertical load each</li><li>• Exterior ladder with fall protection system - OSHA Compliant – as access to silo roof, design with no cage and no rest platforms</li><li>• Accessible roof (1:12) – self supported</li><li>• 1 guardrail (full perimeter)</li><li>• 4' square inlet flange on roof</li></ul> |

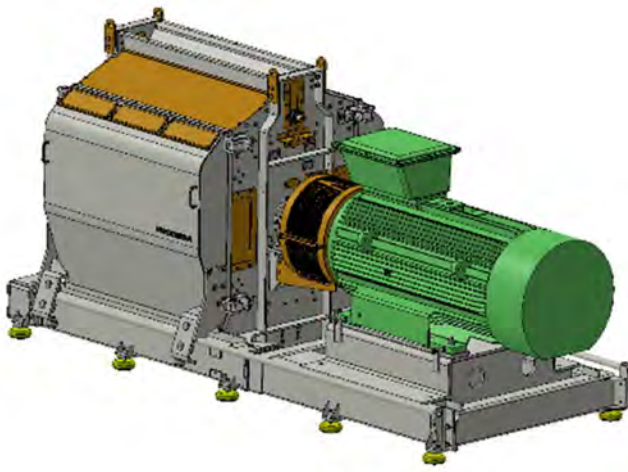
| Pos.                           | Units                    | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                |                       |                       |                       |                 |     |                     |                    |          |                    |                |                         |                            |               |                                |                          |
|--------------------------------|--------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|-----------------------|-----------------------|-----------------------|-----------------|-----|---------------------|--------------------|----------|--------------------|----------------|-------------------------|----------------------------|---------------|--------------------------------|--------------------------|
|                                |                          | <ul style="list-style-type: none"><li>• 2'x 3' bin vent flange on roof</li><li>• 24" roof combination manway pressure relief valve, 2.0 oz. pressure, 0.5 oz. vacuum with removable security cross</li><li>• 2 x 4" dia., Flange (for level control (continuous), silo roof)</li><li>• 4 x 2 1/2" dia. half coupling (for level control min, intermediate or max in silo roof or silo shell)</li><li>• 1 fire suppression line w/ roof mounted nozzles (dry line system)</li></ul> <p><u>Silo Technical data:</u></p> <table><tr><td>Volume (gross)</td><td>45,732 ft3 (1,295 m3)</td></tr><tr><td>Volume (net), approx.</td><td>35,456 ft3 (1,004 m3)</td></tr><tr><td>Angle of repose</td><td>45°</td></tr><tr><td>Inner silo diameter</td><td>33.85' (10.317 mm)</td></tr></table> <p>It includes a <u>ROTATING SCREW</u>:</p> <p>1 turret, supported in a heavy-duty rotary-joint, with external teeth system for transmission of the forward feed drive forces.</p> <p>2 rotating screw, support to one side in the silo center at the turret, screw spiral with progressive pitch, screw flights in special design; supported in a heavy-duty bevel helical gearbox.</p> <p>1 Drive unit for the screw spiral in multilevel design</p> <p>2 forward feed drive for rotation of the turret around the silo centreline</p> <p>1 support frame for assembly of the complete rotating screw unit into the silo bottom structure.</p> <p>1 level switch / overfilling protection in the lower part of the turret for automatic switch-off, in case of an unforeseen shutdown of the downstream conveyor below the rotating screw unit.</p> <p>1 sealing between turret and silo bottom.</p> <p><u>Rotating Screw Technical data:</u></p> <table><tr><td>Diameter</td><td>33.85' (10,317 mm)</td></tr><tr><td>Discharge rate</td><td>11,000 ft3/h (311 m3/h)</td></tr><tr><td>Installed power main drive</td><td>45 kW (60 HP)</td></tr><tr><td>Installed power forward device</td><td>2 x 0.5 Kw (2 x 0.33 HP)</td></tr></table> | Volume (gross) | 45,732 ft3 (1,295 m3) | Volume (net), approx. | 35,456 ft3 (1,004 m3) | Angle of repose | 45° | Inner silo diameter | 33.85' (10.317 mm) | Diameter | 33.85' (10,317 mm) | Discharge rate | 11,000 ft3/h (311 m3/h) | Installed power main drive | 45 kW (60 HP) | Installed power forward device | 2 x 0.5 Kw (2 x 0.33 HP) |
| Volume (gross)                 | 45,732 ft3 (1,295 m3)    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                |                       |                       |                       |                 |     |                     |                    |          |                    |                |                         |                            |               |                                |                          |
| Volume (net), approx.          | 35,456 ft3 (1,004 m3)    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                |                       |                       |                       |                 |     |                     |                    |          |                    |                |                         |                            |               |                                |                          |
| Angle of repose                | 45°                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                |                       |                       |                       |                 |     |                     |                    |          |                    |                |                         |                            |               |                                |                          |
| Inner silo diameter            | 33.85' (10.317 mm)       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                |                       |                       |                       |                 |     |                     |                    |          |                    |                |                         |                            |               |                                |                          |
| Diameter                       | 33.85' (10,317 mm)       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                |                       |                       |                       |                 |     |                     |                    |          |                    |                |                         |                            |               |                                |                          |
| Discharge rate                 | 11,000 ft3/h (311 m3/h)  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                |                       |                       |                       |                 |     |                     |                    |          |                    |                |                         |                            |               |                                |                          |
| Installed power main drive     | 45 kW (60 HP)            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                |                       |                       |                       |                 |     |                     |                    |          |                    |                |                         |                            |               |                                |                          |
| Installed power forward device | 2 x 0.5 Kw (2 x 0.33 HP) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                |                       |                       |                       |                 |     |                     |                    |          |                    |                |                         |                            |               |                                |                          |
| 5.9.4                          | 1                        | <p><b>Diverter</b></p> <p>Installed at the dry product silo outlet, allows discharge the product:</p> <ul style="list-style-type: none"><li>• Outlet 1: Emergency Screw Conveyor</li><li>• Outlet 2: Milling line feeding chain conveyor</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                |                       |                       |                       |                 |     |                     |                    |          |                    |                |                         |                            |               |                                |                          |

| Pos.         | Units    | Description                                                                                                                                                                                                                                                                                               |
|--------------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>5.9.5</b> | <b>1</b> | <b>Emergency screw conveyor</b><br>To empty the silo in case of emergency.                                                                                                                                                                                                                                |
| <b>5.9.6</b> | <b>1</b> | <b>Milling line feeding chain conveyor</b><br>To transport the dried product from the intermediate storage silo diverter (pos 5.9.4) to the dry hammer mills feeding chain conveyor (pos 5.10.1).<br><u>Technical data:</u><br>Length 126 ft (38.5 m)<br>Inclination 20°<br>Installed power 15 kW (20 HP) |
| <b>5.9.7</b> | <b>1</b> | <b>Structures, supports and platforms</b><br>All the metallic structures for the sustentation of the described equipment, the access ladders and platforms and passageways needed for the correct inspection and maintenance of the installation.                                                         |



| Pos             | Units            | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |            |                  |             |           |                 |               |
|-----------------|------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|------------------|-------------|-----------|-----------------|---------------|
| 5.10            |                  | DRY MILLING LINE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |            |                  |             |           |                 |               |
| 5.10.1          | 1                | <p><b>Dry hammer mills feeding chain conveyor</b></p> <p>It receives the product from the previous conveyor (pos 5.9.6) and feeds the dry hammer mills.</p> <p>Double bottom chain conveyor so it is possible to feed the hammer mills and the leftover will be discharged to a second conveyor (pos 5.10.8) to return it to the dry product storage silo (pos 5.9.3)</p> <p><u>Technical data:</u></p> <table><tr><td>Length</td><td>108 ft (33 m)</td></tr><tr><td>Inclination</td><td>0º</td></tr><tr><td>Installed power</td><td>15 kW (20 HP)</td></tr></table>                                                                                                                                                                                                                                                                                                                                                                                                    | Length     | 108 ft (33 m)    | Inclination | 0º        | Installed power | 15 kW (20 HP) |
| Length          | 108 ft (33 m)    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |            |                  |             |           |                 |               |
| Inclination     | 0º               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |            |                  |             |           |                 |               |
| Installed power | 15 kW (20 HP)    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |            |                  |             |           |                 |               |
| 5.10.2          | 4                | <p><b>DHM Dosing bin with triple extracting screw</b></p> <p>Steel bin to collect the dry product and dose it to the hammer mill.</p> <p>It includes dosing screws with frequency converters. Driven by gear box directly mounted on the screw shaft.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |            |                  |             |           |                 |               |
| 5.10.3          | 4                | <p><b>Destoner Rolston DRS 15</b></p> <ul style="list-style-type: none"><li>- Stone separator to evacuate heavy sizes (stones).</li><li>- Permanent magnet to evacuate the metal pieces.</li><li>- Suction pipe to introduce air in the hammer mill.</li></ul> <p><u>Technical data:</u></p> <table><tr><td>Dimensions</td><td>47" x 39 " x 63"</td></tr><tr><td>Weight</td><td>1370 lbs</td></tr></table>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Dimensions | 47" x 39 " x 63" | Weight      | 1370 lbs  |                 |               |
| Dimensions      | 47" x 39 " x 63" |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |            |                  |             |           |                 |               |
| Weight          | 1370 lbs         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |            |                  |             |           |                 |               |
| 5.10.4          | 4                | <div><div><p><b>Dry hammer mill THOR DHM 15</b></p><p><b>Body and frame:</b></p><ul style="list-style-type: none"><li>- A robust body made from welded steel which sits over the rotor</li><li>- A single base frame for the body and motors</li><li>- Suspension feet under the frame with height adjustment</li><li>- A product deflector flap controlled manually at the inlet of hammer mill (two possible positions according to the rotational direction of the rotor)</li></ul><p><b>Drive:</b></p><ul style="list-style-type: none"><li>- Coupling is carried out by machined plates with semi-elastic cylindrical fingers (Mounted under protective guards)</li><li>- Motor included:</li></ul><table><tr><td>Motor</td><td>900 HP</td></tr><tr><td>Motor rpm</td><td>1,500 rpm</td></tr></table></div><div><p>PROGRANUL<br/>Advance Pelleting by PRODESA</p></div></div> | Motor      | 900 HP           | Motor rpm   | 1,500 rpm |                 |               |
| Motor           | 900 HP           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |            |                  |             |           |                 |               |
| Motor rpm       | 1,500 rpm        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |            |                  |             |           |                 |               |

| Pos                | Units                     | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |  |              |          |     |       |     |                    |        |       |                           |       |         |            |                 |        |         |               |             |                    |                           |
|--------------------|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--------------|----------|-----|-------|-----|--------------------|--------|-------|---------------------------|-------|---------|------------|-----------------|--------|---------|---------------|-------------|--------------------|---------------------------|
|                    |                           | <table><tr><td></td><td>Direct drive</td></tr></table> <p><b>Rotor:</b></p> <ul style="list-style-type: none"><li>- Big and heavy, mounted to two external roller bearings</li></ul> <table><tr><td>Diameter</td><td>55"</td></tr><tr><td>Width</td><td>60"</td></tr></table> <ul style="list-style-type: none"><li>- Rotor rotational direction can be clock-wise or counter clock-wise</li></ul> <p><b>Screens</b></p> <ul style="list-style-type: none"><li>- The total screening surface is composed of 6 distinct sections (individual screens)</li></ul> <table><tr><td>Total surface area</td><td>48 ft²</td></tr></table> <ul style="list-style-type: none"><li>- Internal impact zones are composed of removable plates, some of which are equipped with static counter-hammers</li><li>- 1st set of screens (6) supplied with the hammer mill (diameter to be defined in further stages)</li><li>- Screens are changed manually when the hammer mill is stopped</li></ul> <p><b>Hammers:</b></p> <table><tr><td>Units</td><td>216 (1<sup>st</sup> set)</td></tr><tr><td>Speed</td><td>109 m/s</td></tr><tr><td>Dimensions</td><td>13" x 3" x 0.4"</td></tr><tr><td>Weight</td><td>4.6 lbs</td></tr></table> <p><b>Access doors:</b></p> <ul style="list-style-type: none"><li>- Two access doors on each side of the machine; each equipped with electric security locks</li></ul> <p><b>An electrical terminal block for the connection of various sensors (pre-wired in our workshop):</b></p> <ul style="list-style-type: none"><li>- Two electromechanical limit switches confirming the position of the inlet deflector flap</li><li>- Vibration sensor mounted to one of the side plates</li><li>- Temperature sensors on the bearings</li></ul> <p><b>Tools for hammer mill maintenance:</b></p> <ul style="list-style-type: none"><li>- Set of anti-drop steel plates (to prevent anything from falling under the hammer mill during maintenance)</li></ul> <p><u>Additional technical data:</u></p> <table><tr><td>Inlet opening</td><td>12" x 60.9"</td></tr><tr><td>Self-propelled air</td><td>14,714 CFM (25,000 Nm³/h)</td></tr></table> |  | Direct drive | Diameter | 55" | Width | 60" | Total surface area | 48 ft² | Units | 216 (1 <sup>st</sup> set) | Speed | 109 m/s | Dimensions | 13" x 3" x 0.4" | Weight | 4.6 lbs | Inlet opening | 12" x 60.9" | Self-propelled air | 14,714 CFM (25,000 Nm³/h) |
|                    | Direct drive              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |              |          |     |       |     |                    |        |       |                           |       |         |            |                 |        |         |               |             |                    |                           |
| Diameter           | 55"                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |              |          |     |       |     |                    |        |       |                           |       |         |            |                 |        |         |               |             |                    |                           |
| Width              | 60"                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |              |          |     |       |     |                    |        |       |                           |       |         |            |                 |        |         |               |             |                    |                           |
| Total surface area | 48 ft²                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |              |          |     |       |     |                    |        |       |                           |       |         |            |                 |        |         |               |             |                    |                           |
| Units              | 216 (1 <sup>st</sup> set) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |              |          |     |       |     |                    |        |       |                           |       |         |            |                 |        |         |               |             |                    |                           |
| Speed              | 109 m/s                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |              |          |     |       |     |                    |        |       |                           |       |         |            |                 |        |         |               |             |                    |                           |
| Dimensions         | 13" x 3" x 0.4"           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |              |          |     |       |     |                    |        |       |                           |       |         |            |                 |        |         |               |             |                    |                           |
| Weight             | 4.6 lbs                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |              |          |     |       |     |                    |        |       |                           |       |         |            |                 |        |         |               |             |                    |                           |
| Inlet opening      | 12" x 60.9"               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |              |          |     |       |     |                    |        |       |                           |       |         |            |                 |        |         |               |             |                    |                           |
| Self-propelled air | 14,714 CFM (25,000 Nm³/h) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |              |          |     |       |     |                    |        |       |                           |       |         |            |                 |        |         |               |             |                    |                           |

| Pos    | Units | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|--------|-------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|        |       | <p>Total weight (without motor) 7.850 kg</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 5.10.5 | 4     | <p><b>Dry hammer mill PLENUM CHAMBER and PNEUMATIC SYSTEM</b></p> <p>It includes:</p> <ul style="list-style-type: none"> <li>• <u>PLENUM CHAMBER</u> <p>The milled product is discharged by gravity in a discharge hopper. It includes:</p> <ul style="list-style-type: none"> <li>○ <u>Back pressure flaps:</u> <p>Equipment which prevents the transmission of the dangerous effects of an explosion, a pressure wave and flames before the filter. It prevents too the dust returns when the installation is stopped.</p> </li> <li>○ <u>Extracting chain conveyor</u></li> <li>○ <u>Rotary valve</u>, for the pneumatic sealing of the hammer mill circuit.</li> </ul> </li> <li>• <u>PNEUMATIC SYSTEM</u> <p>It includes the ducting (from plenum chamber to inlet cyclofilter, outlet cyclofilter to fan) cyclofilter with explosion panels, valves, exhaust fan and stack:</p> <ul style="list-style-type: none"> <li>○ Ducting</li> <li>○ Explosion isolation valve, to be installed at the inlet duct, with micro switch and dust level sensor</li> </ul> </li> </ul> |

| Pos             | Units           | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |        |                 |             |          |                 |                 |
|-----------------|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-----------------|-------------|----------|-----------------|-----------------|
|                 |                 | <ul style="list-style-type: none"><li>○ Cyclofilter, with explosion venting and explosion vent burst indicators. 232 filter bags that provide 2,413 square feet of media for 15,000 CFM airflow.</li><li>○ 48” Bottom hopper with screw conveyor + 12” NFPA Rotary valve</li><li>○ Fan 75 HP</li><li>○ Cyclofilter platform/ladder</li></ul>                                                                                                                                                                                                                                                                                                                                                  |        |                 |             |          |                 |                 |
| 5.10.6          | 1               | <p><b>Spark detector and extinguishing system</b></p> <p>To be installed in the ducts of the pneumatic systems of each hammer mill, it includes the following devices:</p> <ul style="list-style-type: none"><li>• Spark detection central (one unique and common for all the different lines)</li></ul> <p>For the connection of the detecting instruments (upgradeable)</p> <p>It registers the all the events: alarms, number of sparks, sparks threshold, time threshold, extinguishing time.</p> <p>Microprocessor with an automatic control system.</p> <ul style="list-style-type: none"><li>• Spark detectors</li><li>• Extinghisihing devices</li><li>• Flashing alarm hor</li></ul> |        |                 |             |          |                 |                 |
| 5.10.7          | 1               | <p><b>Dry and milled product chain conveyor</b></p> <p>It receives the product from the dry hammer mills and discharges into pelleting line feeding chain conveyor (pos. 5.11.6).</p> <p><u>Technical data:</u></p> <table><tr><td>Length</td><td>197 ft (60 m)</td></tr><tr><td>Inclination</td><td>0º - 21º</td></tr><tr><td>Installed power</td><td>18.5 kW (25 HP)</td></tr></table>                                                                                                                                                                                                                                                                                                      | Length | 197 ft (60 m)   | Inclination | 0º - 21º | Installed power | 18.5 kW (25 HP) |
| Length          | 197 ft (60 m)   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |        |                 |             |          |                 |                 |
| Inclination     | 0º - 21º        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |        |                 |             |          |                 |                 |
| Installed power | 18.5 kW (25 HP) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |        |                 |             |          |                 |                 |
| 5.10.8          | 1               | <p><b>Dry product recirculation chain conveyor</b></p> <p>It receives the product from the dry hammer mills feeding chain conveyor pos 5.10.1 to be introduced again in the dry product storage silo</p> <p><u>Technical data:</u></p> <table><tr><td>Length</td><td>123 ft (37.5 m)</td></tr><tr><td>Inclination</td><td>16º</td></tr><tr><td>Installed power</td><td>15 kW (20 HP)</td></tr></table>                                                                                                                                                                                                                                                                                        | Length | 123 ft (37.5 m) | Inclination | 16º      | Installed power | 15 kW (20 HP)   |
| Length          | 123 ft (37.5 m) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |        |                 |             |          |                 |                 |
| Inclination     | 16º             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |        |                 |             |          |                 |                 |
| Installed power | 15 kW (20 HP)   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |        |                 |             |          |                 |                 |



| Pos           | Units    | Description                                                                                                                                                                                                                                                                                                                                                             |
|---------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>5.10.9</b> | <b>1</b> | <p><b>Support structures and painting</b></p> <p>Metal structures necessary for the support of described equipment, as well as access stairs and walkways required for the inspection and maintenance of the facility.</p> <p>All items (except stainless and galvanized steel) are supplied with a first coat of synthetic painting according to our standard RAL.</p> |

| Pos.            | Units           | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |        |               |             |          |                 |                 |
|-----------------|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---------------|-------------|----------|-----------------|-----------------|
| 5.11            |                 | DRY & MILLED PRODUCT STORAGE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |        |               |             |          |                 |                 |
| 5.11.1          | 1               | <p><b>Chain conveyor</b></p> <p>Moves the leftover dry and milled product from the pelleting line, to the dry and milled product storage.</p> <p><u>Technical data:</u></p> <table><tr><td>Length</td><td>164 ft (50 m)</td></tr><tr><td>Inclination</td><td>0° - 25°</td></tr><tr><td>Installed power</td><td>18.5 kW (25 HP)</td></tr></table>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Length | 164 ft (50 m) | Inclination | 0° - 25° | Installed power | 18.5 kW (25 HP) |
| Length          | 164 ft (50 m)   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |        |               |             |          |                 |                 |
| Inclination     | 0° - 25°        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |        |               |             |          |                 |                 |
| Installed power | 18.5 kW (25 HP) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |        |               |             |          |                 |                 |
| 5.11.2          | 1               | <p><b>Screw conveyor</b></p> <p>It receives the dry and milled product from the previous chain conveyor (pos 5.11.1) and discharges it into the dry and milled product silo. It includes a second outlet as emergency exit..</p> <p><u>Technical data:</u></p> <table><tr><td>Length</td><td>21 ft (6.5 m)</td></tr><tr><td>Inclination</td><td>0°</td></tr><tr><td>Installed power</td><td>7.5 kW (10 HP)</td></tr></table>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Length | 21 ft (6.5 m) | Inclination | 0°       | Installed power | 7.5 kW (10 HP)  |
| Length          | 21 ft (6.5 m)   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |        |               |             |          |                 |                 |
| Inclination     | 0°              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |        |               |             |          |                 |                 |
| Installed power | 7.5 kW (10 HP)  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |        |               |             |          |                 |                 |
| 5.11.3          | 1               | <p><b>Intermediate storage vertical silo</b></p> <p><u>VERTICAL SILO:</u> Bolted carbon and carbon steel construction, delivered in prefabricated segments or parts for assembling on site.</p> <p>It consists of:</p> <ul style="list-style-type: none"><li>• Interior floor assembly with all assembling and connection openings</li><li>• 4' x 4' opening in skirt as outlet for process conveyor</li><li>• 4' x 4' opening in skirt as outlet for dump conveyor1</li><li>• 6' x 6'-8" Double Walk-Through Door in silo skirt1</li><li>• 36" x 48" maintenance opening at level of product floor</li><li>• 4'-6" x 4'-6" exterior platform at level of product floor with access ladder and fall protection system</li><li>• 1 set of explosion vents arranged underneath eave</li><li>• 4 x eave mounted conveyor support columns, designed for max 10 kip vertical load each</li><li>• Exterior ladder with fall protection system - OSHA Compliant – as access to silo</li><li>• roof, design with no cage and no rest platforms</li><li>• Accessible roof (1:12) – self supported</li><li>• 1 guardrail (full perimeter)</li></ul> |        |               |             |          |                 |                 |

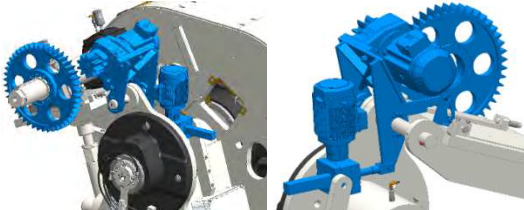
| Pos.                           | Units                     | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                |                       |                       |                       |                 |     |                     |                    |          |                    |                |                         |                            |               |                                |                           |
|--------------------------------|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|-----------------------|-----------------------|-----------------------|-----------------|-----|---------------------|--------------------|----------|--------------------|----------------|-------------------------|----------------------------|---------------|--------------------------------|---------------------------|
|                                |                           | <ul style="list-style-type: none"><li>• 4' square inlet flange on roof</li><li>• 2'x 3' bin vent flange on roof</li><li>• 24" roof combination manway pressure relief valve, 2.0 oz. pressure, 0.5 oz. vacuum with removable security cross</li><li>• 2 x 4" dia., Flange (for level control (continuous), silo roof)</li><li>• 4 x 2 1/2" dia. half coupling (for level control min, intermediate or max in silo roof or silo shell)</li><li>• 1 fire suppression line w/ roof mounted nozzles (dry line system)</li></ul> <p><u>Silo Technical data:</u></p> <table><tr><td>Volume (gross)</td><td>45,732 ft3 (1,295 m3)</td></tr><tr><td>Volume (net), approx.</td><td>35,456 ft3 (1,004 m3)</td></tr><tr><td>Angle of repose</td><td>45°</td></tr><tr><td>Inner silo diameter</td><td>33.85' (10.317 mm)</td></tr></table> <p>It includes a <u>ROTATING SCREW</u>:</p> <p>1 turret, supported in a heavy-duty rotary-joint, with external teeth system for transmission of the forward feed drive forces.</p> <p>2 rotating screw, support to one side in the silo center at the turret, screw spiral with progressive pitch, screw flights in special design; supported in a heavy-duty bevel helical gearbox.</p> <p>1 Drive unit for the screw spiral in multilevel design</p> <p>2 forward feed drive for rotation of the turret around the silo centreline</p> <p>1 support frame for assembly of the complete rotating screw unit into the silo bottom structure.</p> <p>1 level switch / overfilling protection in the lower part of the turret for automatic switch-off, in case of an unforeseen shutdown of the downstream conveyor below the rotating screw unit.</p> <p>1 sealing between turret and silo bottom.</p> <p><u>Rotating Screw Technical data:</u></p> <table><tr><td>Diameter</td><td>33.85' (10,317 mm)</td></tr><tr><td>Discharge rate</td><td>12,361 ft3/h (350 m3/h)</td></tr><tr><td>Installed power main drive</td><td>45 kW (60 HP)</td></tr><tr><td>Installed power forward device</td><td>2 x 0.25 Kw (2 x 0.33 HP)</td></tr></table> | Volume (gross) | 45,732 ft3 (1,295 m3) | Volume (net), approx. | 35,456 ft3 (1,004 m3) | Angle of repose | 45° | Inner silo diameter | 33.85' (10.317 mm) | Diameter | 33.85' (10,317 mm) | Discharge rate | 12,361 ft3/h (350 m3/h) | Installed power main drive | 45 kW (60 HP) | Installed power forward device | 2 x 0.25 Kw (2 x 0.33 HP) |
| Volume (gross)                 | 45,732 ft3 (1,295 m3)     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                |                       |                       |                       |                 |     |                     |                    |          |                    |                |                         |                            |               |                                |                           |
| Volume (net), approx.          | 35,456 ft3 (1,004 m3)     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                |                       |                       |                       |                 |     |                     |                    |          |                    |                |                         |                            |               |                                |                           |
| Angle of repose                | 45°                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                |                       |                       |                       |                 |     |                     |                    |          |                    |                |                         |                            |               |                                |                           |
| Inner silo diameter            | 33.85' (10.317 mm)        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                |                       |                       |                       |                 |     |                     |                    |          |                    |                |                         |                            |               |                                |                           |
| Diameter                       | 33.85' (10,317 mm)        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                |                       |                       |                       |                 |     |                     |                    |          |                    |                |                         |                            |               |                                |                           |
| Discharge rate                 | 12,361 ft3/h (350 m3/h)   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                |                       |                       |                       |                 |     |                     |                    |          |                    |                |                         |                            |               |                                |                           |
| Installed power main drive     | 45 kW (60 HP)             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                |                       |                       |                       |                 |     |                     |                    |          |                    |                |                         |                            |               |                                |                           |
| Installed power forward device | 2 x 0.25 Kw (2 x 0.33 HP) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                |                       |                       |                       |                 |     |                     |                    |          |                    |                |                         |                            |               |                                |                           |
| 5.11.4                         | 1                         | <p><b>Diverter</b></p> <p>Installed at the dry product silo outlet, allows discharge the product:</p> <ul style="list-style-type: none"><li>• Outlet 1: Emergency Screw Conveyor</li><li>• Outlet 2: Pelleting line feeding chain conveyor</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                |                       |                       |                       |                 |     |                     |                    |          |                    |                |                         |                            |               |                                |                           |

| Pos.          | Units    | Description                                                                                                                                                                                                                                                                    |
|---------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>5.11.5</b> | <b>1</b> | <b>Emergency screw conveyor</b><br>To empty the silo in case of emergency.                                                                                                                                                                                                     |
| <b>5.11.6</b> | <b>1</b> | <b>Pelleting line feeding chain conveyor</b><br>To transport the dried product from the intermediate storage silo diverter (pos 5.11.3) to the two pelleting lines.<br><u>Technical data:</u><br>Length 161 ft (49 m)<br>Inclination 11° - 0°<br>Installed power 11 kW (15 HP) |
| <b>5.11.7</b> | <b>1</b> | <b>Pelleting line 1 Screw conveyor</b><br>It receives the product from the pelleting line feeding chain conveyor (pos 5.11.6) and feeds the pelleting line 1.<br>To control de product flow that is fed to each pelleting line.                                                |
| <b>5.11.8</b> | <b>1</b> | <b>Structures, supports and platforms</b><br>All the metallic structures for the sustentation of the described equipment, the access ladders and platforms and passageways needed for the correct inspection and maintenance of the installation.                              |



| Pos.          | Units     | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|---------------|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>5.12</b>   | <b>1</b>  | <b>PELLETING LINE</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>5.12.1</b> | <b>2</b>  | <p><b>Pellet mills feeding chain conveyor</b></p> <p>Double bottom chain conveyor that collect the product from the previous conveyors (pos 5.11.6 for one pelleting line and pos 5.11.7 for the other pelleting line) to feed the pellet mills. The leftover returns to the dry &amp; milled product silo through the chain conveyor pos 5.11.1.</p> <p><u>Technical data/UNIT</u></p> <p>Length 78.7 ft (24 m)</p> <p>Inclination 0°</p> <p>Installed power 5.5 kW (7.5 HP)</p>                                                                                                                                                                                                                  |
| <b>5.12.2</b> | <b>12</b> | <p><b>Feeding dosing screw FS 1 x 3.0</b></p> <p> AdvancePelleting by PRODESA</p> <p>To dose the product into the pellet mill through frequency converter<sup>[1]</sup></p> <p>Driven by gearbox</p> <p><u>Technical data:</u></p> <p>Diameter of screw 12"</p> <p>Length 6.5 ft</p> <p>Material AISI 304 stainless steel</p> <p>Electrical installed power 2.2 Kw (3 HP)</p> <p>By variable Frequency Drive (optional)</p>                                                                                                                                                                                     |
| <b>5.12.3</b> | <b>12</b> | <p><b>Conditioner CD 45</b></p> <p> AdvancePelleting by PRODESA</p> <p>For a correct conditioning of the product before the pelletizing, through water addition.</p> <p>Rotor with 50 adjustable and detachable paddles made of stainless steel</p> <p>Inspection door with safety magnetic detector</p> <p>PT 100 sensor</p> <p>Driven by gearbox</p> <p><u>Technical data:</u></p> <p>Material Stainless steel</p> <p>Length 87"</p> <p>Volume 12.5 ft³</p> <p>Conditioner rotation 500 rpm</p> <p>Inlet water flange diameter 10 mm</p> <p>Electrical installed power (each) 10 HP</p> <p>Full Voltage</p> |



| Pos.           | Units | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |       |   |                |       |               |    |
|----------------|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|---|----------------|-------|---------------|----|
|                |       | <div><div><div><div>- Two corrugated rollers (ED) - Micrometric adjustment (Low grease consumption)</div><table><tr><td>Units</td><td>2</td></tr><tr><td>Outer diameter</td><td>15,3"</td></tr><tr><td>Working width</td><td>4"</td></tr></table></div></div><div><div><b>Main door and hinged feeding chute</b></div><div><div><div>- Made of stainless steel</div><div>- Door opening to the left or right (reversible)</div><div>- Mechanical safety locks for both the main door and hinged chute (opening to the right). To be connected to the local control cabinet (deported electronics)</div><div>- Opening on door with butterfly flap for steam extraction</div></div></div><div><div><b>An electrical box to connect the sensors and probes (Pre-wired in our workshop)</b></div><div><div><div>- Temperature probes for the secondary shaft bearings</div><div>- Vibration control probes placed on the secondary shaft bearing housing</div><div>- Speed control and module counting of the main pulley</div><div>- Cooling fan for the toothed belts</div><div>- Safety pin rupture sensor</div></div></div><div><div><u>Additional data:</u></div><div><div>Weight</div><div>26,500 lbs</div></div></div></div></div></div> | Units | 2 | Outer diameter | 15,3" | Working width | 4" |
| Units          | 2     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |       |   |                |       |               |    |
| Outer diameter | 15,3" |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |       |   |                |       |               |    |
| Working width  | 4"    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |       |   |                |       |               |    |
| 5.12.5         | 12    | <div><div><div><b>Slow die rotation system</b></div><div><div><div>To be able to work with the die turning bidirectional at low speed and during maintenance operations and adjustments.</div><div>Mechanical system which allows to work with the die turning at low speed during the maintenance operation and adjustments. It means a greater operator safety.</div><div>It allows to reduce the speed from 91 rpm to 1 rpm.</div></div></div><div><div></div></div><div><div><u>Technical data:</u></div><div><div><div>Rotation speed with slow rotation system</div><div>Electrical installed power (each)</div></div><div><div>1 rpm</div><div>4 HP (3 Kw)</div><div>Variable Frequency Drive</div></div></div></div></div></div>                                                                                                                                                                                                                                                                                                                                                                                                                  |       |   |                |       |               |    |
| 5.12.6         | 12    | <div><div><div><b>Water injection system</b></div></div></div>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |       |   |                |       |               |    |

| Pos.           | Units     | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----------------|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>5.12.7</b>  | <b>12</b> | <b>Pellet mill lubrication system</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>5.12.8</b>  | <b>2</b>  | <p><b>Tool kit</b></p> <p>For the pellet mills maintenance. It includes:</p> <ul style="list-style-type: none"> <li>• <u>Set of tools</u></li> </ul> <p>Tool set used to perform all maintenance and adjustments on the pellet mill: special hoop for die handling, reinforced front hoop,), small tools for bolts dismounting, tension gauge (laser tensiometer)</p> <ul style="list-style-type: none"> <li>• <u>Thermal system for die mounting</u></li> </ul> <p>Thermo-mechanical system using heating belts to heat up and dilate the front hoop and floor bearing to remove and replace the die.</p> <ul style="list-style-type: none"> <li>○ Heating belt composed of two half-rings equipped with resistors and a thermocouple</li> <li>○ Power: 2 x 12 kW – 380 V – 50 Hz</li> <li>○ Electrical control cabinet mounted to a mobile trolley</li> </ul> <ul style="list-style-type: none"> <li>• <u>Trolley for die and rollers maintenance and replacement</u></li> </ul> <p>Die and roll handling system. One trolley can be used for a park of several machines. Hooks to lift die and rollers (for crane trolley ,the equipment has been controlled and certified for safety use under indicated working conditions.</p> <ul style="list-style-type: none"> <li>○ Manual trolley for 1100 kg load</li> <li>○ Double effect pump</li> </ul> |
| <b>5.12.9</b>  | <b>12</b> | <b>By-pass at the pellet mills outlet</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>5.12.10</b> | <b>2</b>  | <p><b>Demister circuit</b></p> <p>It collects the mist produced during the pelletizing process into the pellet mills. The mist will transport air and solid particles.</p> <p>The mist flow is transported through a channel with a hollow screw which takes out the solid particles.</p> <p>A special outlet gate unloads the refuse product on a container.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>5.12.11</b> | <b>2</b>  | <p><b>Hot pellets chain conveyor</b></p> <p>To collect the pellets at the outlet of the pellet mills and discharges them into the hot pellets bucket elevator</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

| Pos.           | Units    | Description                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                |          | <u>Technical data:</u><br>Material<br>Length approx. Stainless steel 304<br>85.3 ft (26 m)                                                                                                                                                                                                                                                                                                                     |
| <b>5.12.12</b> | <b>2</b> | <b>Hot pellets bucket elevator</b><br>For elevating the pellets to the pellet cooler<br>Driven by gear box directly mounted<br>It includes explosion protection including venting panels and pressure sensors.<br>It includes a by pass at its outlet in order to send the product out of the line as an emergency<br><u>Technical data:</u><br>Material<br>Total height Stainless steel 304<br>49.2 ft (15 m) |
| <b>5.12.13</b> | <b>2</b> | <b>Pellets cooler</b><br>Counter current vertical cooler to reduce the temperature of the pellets.<br>Including: <ul style="list-style-type: none"> <li>- 1 Inlet rotary valve</li> <li>- 1 aspiration inlet</li> <li>- 2 level detectors</li> <li>- 1 pellets extraction device</li> <li>- 1 supporting steel structure</li> <li>- 1 collecting hopper for pellets</li> </ul>                                 |
| <b>5.12.14</b> | <b>2</b> | <b>Cooling pneumatic system</b><br>Includes: cyclone, rotary valve, fan and pipes.<br><u>Technical data/unit</u><br>Cooling air flow<br>Fan motor 60,760 m <sup>3</sup> /h<br>180 HP (132 Kw)                                                                                                                                                                                                                  |
| <b>5.12.15</b> | <b>2</b> | <b>Pellet sifter</b><br>For the separation of the fine particles at the cooler output.                                                                                                                                                                                                                                                                                                                         |
| <b>5.12.16</b> | <b>1</b> | <b>Fines and broken pellets collecting conveyor 1</b><br>To collect fines and broken pellets from the pellets screens and from the cooler cyclones, and carries then back to dry product silo through the conveyor pos 5.12.17.<br><u>Technical data:</u><br>Length<br>Inclination<br>Installed power 55.7 ft (17 m)<br>0° - 10°<br>3.5 kW (5 HP)                                                              |

| Pos.            | Units         | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |        |               |             |     |                 |               |
|-----------------|---------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---------------|-------------|-----|-----------------|---------------|
| 5.12.17         | 1             | <p><b>Fines and broken pellets collecting conveyor 2</b></p> <p>To collect fines and broken pellets from the previous conveyor (pos 5.12.7) and discharges it into the dry product silo.</p> <p><u>Technical data:</u></p> <table><tr><td>Length</td><td>151 ft (46 m)</td></tr><tr><td>Inclination</td><td>15º</td></tr><tr><td>Installed power</td><td>45 kW (60 HP)</td></tr></table>                                                                                                                                                                                                                                                                                                                                                                                                                      | Length | 151 ft (46 m) | Inclination | 15º | Installed power | 45 kW (60 HP) |
| Length          | 151 ft (46 m) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |        |               |             |     |                 |               |
| Inclination     | 15º           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |        |               |             |     |                 |               |
| Installed power | 45 kW (60 HP) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |        |               |             |     |                 |               |
| 5.12.18         | 1             | <p><b>Spark detector and extinguishing system</b></p> <p>To be installed in the following points:</p> <ul style="list-style-type: none"><li>- 1 x Outlet of hot pellets bucket elevator</li><li>- 1 x Pneumatic system of the coolers</li></ul> <p>It includes the following devices:</p> <ul style="list-style-type: none"><li>• Spark detection central (one unique and common for all the different lines)</li></ul> <p>For the connection of the detecting instruments (upgradeable)</p> <p>It registers the all the events: alarms, number of sparks, sparks threshold, time threshold, extinguishing time.</p> <p>Microprocessor with an automatic control system.</p> <ul style="list-style-type: none"><li>• Spark detectors</li><li>• Extinghisihing devices</li><li>• Flashing alarm horn</li></ul> |        |               |             |     |                 |               |
| 5.12.19         | 1             | <p><b>Structures, supports and platforms</b></p> <p>All the metallic structures for the sustentation of the described equipment, the access ladders and platforms and passageways needed for the correct inspection and maintenance of the installation.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |        |               |             |     |                 |               |

| Pos           | Units    | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>5.13</b>   | <b>1</b> | <b>Milling and Pelleting Island RTO</b> (RCO correction)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>5.13.1</b> | <b>1</b> | <b>Inlet manifold</b><br>Materials of Construction: Type 304L stainless steel, with minimum 10-gauge thickness, adequately stiffened to withstand maximum internal pressures.<br>Operational Parameters: $\pm 25$ IWC; 176°F (0.06 bar @ 80°C).<br>Access: One access door for internal inspection of inlet manifold.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>5.13.2</b> | <b>1</b> | <b>Diverter Valves</b><br>Materials of Construction: Type 304L stainless steel 3/16 in. thick and adequately stiffened to withstand maximum internal pressures.<br>Operational Parameters: $\pm 25$ IWC; 176°F (0.06 bar @ 80°C) inlet and 209°F outlet (98°C); maximum operational temperature is 600°F (316°C) during bake-out, and occurrence is for duration of 15-minute intervals.<br>Valve Trim Construction: Main disk 3/16-inch-thick, Type 2101 duplex stainless steel; support disks 3/16-inch-thick Type 304L stainless steel. Seat materials are Type 304L stainless steel. Seal arrangement is metal to metal sealing surfaces without elastomeric compounds that would damage during bake-out.<br>Access: One access door for internal inspection.<br>Valve Actuation System: Parker 2A heavy duty pneumatic cylinder, adjustable end cushions at each end of travel; direct link with Parker linear alignment coupling, inductive proximity switches measuring actual valve shaft position, actuation time is 0.5 seconds full open to full close; the assembly is pre-assembled and pre-wired to junction box. |
| <b>5.13.3</b> | <b>1</b> | <b>Hopper Transitions</b><br>Materials of Construction: Type 304 stainless steel 3/16-inch-thick and adequately stiffened to withstand maximum internal pressures.<br>Operational Parameters: $\pm 25$ IWC; 176°F (0.06 bar @ 80°C) inlet and 209°C outlet (98°C); maximum operational temperature is 600°F (316°C) during bake-out                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>5.13.4</b> | <b>1</b> | <b>Heat Recovery Sections</b><br>Materials of Construction: Type 304L stainless steel 3/16-inch-thick and adequately stiffened to withstand maximum internal pressures<br>Operational Parameters: $\pm 25$ IWC (0.06 bar); 176°F (80°C) inlet and 1500°F outlet (816°C); maximum operational temperature 1800°F (982°C) at top and 1100°F (593°C) at bottom.<br>Media Support Structure: Type 304 stainless steel structure with laser cut slotted plate; maximum design temperature of 1100°F (593°C); maximum free passage of 70% open area; centered in heat recovery chamber with no direct contact to outside walls; both ends floating to allow for thermal expansion.                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

| Pos            | Units    | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|----------------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                |          | Access: Inspection access to the support structures is through the diverter valve; inspection access to top of heat recovery section is through combustion chamber access .                                                                                                                                                                                                                                                                                           |
| <b>5.13.5</b>  | <b>1</b> | <b>Combustion Chamber</b><br>Materials of Construction: Type 304L stainless steel 3/16-inch-thick and adequately stiffened to withstand maximum internal pressures.<br>Operational Parameters: $\pm 25$ IWC (0.06 bar); normal operation 1500°F (816°C); maximum operational temperature 1800°F (982°C).<br>Access: One access door in the combustion chamber.                                                                                                        |
| <b>5.13.6</b>  | <b>1</b> | <b>Outlet Manifolds</b><br>Materials of Construction: A36 carbon steel, 1/4" thick and adequately stiffened to withstand maximum internal pressures.<br>Operational Parameters: $\pm 25$ IWC (0.06 bar); 204°F (96°C) normal operating temperature; maximum operational temperature is 800°F (427°C) during bake-out and occurrence is for a duration of 15 minutes intervals.<br>Access: One (1) man door for internal inspection                                    |
| <b>5.13.7</b>  | <b>1</b> | <b>Process Dampers</b><br>Materials of Construction: Type 304L stainless steel for inlet side of RTO and A36 for discharge side of RTO.<br>Type: Butterfly with tadpole seats..                                                                                                                                                                                                                                                                                       |
| <b>5.13.8</b>  | <b>1</b> | <b>ID Fan</b><br>Static Pressure: 25 IWC (0.06 bar); includes additional pressure with 2 IWC (0.005 bar) for incoming duct loss                                                                                                                                                                                                                                                                                                                                       |
| <b>5.13.9</b>  | <b>1</b> | <b>Exhaust Stack</b><br>Materials of Construction: A36 carbon steel.<br>Features: Sampling platform per specifications, ladder from grade to platform, free standing                                                                                                                                                                                                                                                                                                  |
| <b>5.13.10</b> | <b>1</b> | <b>Internal Ceramic Refractory</b><br>Heat Recovery Sections: Minimum 6" thick 8 lb density (15.24 cm thick @ 3.64 kg density).<br>Combustion Chamber: Minimum 8" thick 8 lb density (20.32 cm thick @ 3.64 kg density).<br>Type: Unifrax or approved equal; Anchor-Loc spun fiber ceramic modules.<br>Attachment Method: Welded/threaded stud, Stainless steel.<br>Combustion Chamber Temperature: 1550°F (843°C).<br>Maximum Internal Temperature: 2200°F (1204°C). |



| Pos            | Units    | Description                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                |          | External Skin Temperature: Less than 150°F (66°C) at 70°F (21°C) with 5 mph (8 km/hr) wind.                                                                                                                                                                                                                                                                                                                                                     |
| <b>5.13.11</b> | <b>1</b> | <b>Heat Recovery Media</b><br>Type: MLM structured media by Lantec or equal.<br>Thermal Efficiency: 96.5% TE.                                                                                                                                                                                                                                                                                                                                   |
| <b>5.13.12</b> | <b>1</b> | <b>Burner System</b><br>Type: Maxon Kinemax.<br>Features: Maxon series 5000 blocking valves, Honeywell C6097 A series pressure switches, Actarus B 38 R pressure regulators, Maxon MicroRatio series air/gas proportioning valves, combustion blower, Honeywell RM 7800L flame supervisory system, Honeywell C7061 A self-checking flame scanner, and Honeywell UDC 2500 over temperature control; supplied pre-piped, pre-wired, skid mounted. |
| <b>5.13.13</b> | <b>1</b> | <b>RTO Control Devices</b><br>The following devices are included in order to control the RTO via PLC: <ul style="list-style-type: none"> <li>• Temperature Control Sensors</li> <li>• Temperature Transmitters</li> <li>• Zero Speed Switches</li> <li>• Pressure Transmitters</li> <li>• Proximity Switches (Capacitive and Inductive)</li> <li>• Flame Scanner(s)</li> </ul>                                                                  |
| <b>5.13.14</b> | <b>1</b> | <b>Structures, supports and platforms</b><br>All the metallic structures for the sustentation of the described equipment, the access ladders and platforms and passage ways needed for the correct inspection and maintenance of the installation.<br>All the equipment (except those in inox steel) are supplied with a layer of epoxy covered by a layer of synthetic paint, according with our standard RAL                                  |

| Pos.          | Units    | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|---------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>5.14</b>   |          | <b>Electrical equipment and control system</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>5.14.1</b> | <b>1</b> | <b>Control system</b> <ul style="list-style-type: none"> <li>Automatic process control. In order to control and regulate the plant, a PLC (Siemens S7-300, S7-1500 or similar), with visualization and trending, is supplied. For maintenance and regulation of every equipment, it exists the possibility of controlling them in a manual mode.</li> <li>Independent control systems in dry line and pellet line. In this way, for maintenance, it can be possible to disconnect completely one line, whereas the other one can continue operating.</li> <li>There are instrumentation control inputs and outputs in electrical cabinets, which are located near the equipment. These inputs and outputs include IP 54 protection in order to reduce the cabling and to avoid interferences.</li> <li>Local control electrical cabinets for the main equipment, such as mills and pellet mills.</li> <li>Communication between electrical cabinets by Profibus, Profinet or CANopen. Ring layout in order to guarantee a better performance.</li> <li>Double communications card. The first one to ensure SCADA communications and the other one to control inputs/outputs.</li> <li>Safety controllers to manage the general emergency stop and the safety circuits of main equipment.</li> <li>Internet connection for remote maintenance to be supplied by client.</li> <li>Process instrumentation: IFM, Edress Hauser, Wika, Schmersall, ACO, etc.</li> </ul> |
| <b>5.14.2</b> | <b>1</b> | <b>Monitoring System</b> <ul style="list-style-type: none"> <li>Monitoring system PC-SCADA, based on WinCC, Cimplicity or similar.</li> <li>PC in Rack with constant supply, SAI.</li> <li>Rack of connecting PC-SCADA, SAI and Switch of Ethernet connections.</li> <li>Redundant hard disks.</li> <li>Display system in several monitors at the same time. Thanks to it, it can be possible to display the whole plant state in a simple way.</li> <li>Display of process parameters, input data and state of the sequence.</li> <li>Functioning and operation control, with the equipment working in a manual mode.</li> <li>Graphs and functioning records. In this way, it can be possible to visualize current trends or recover old records in order to analyze them.</li> <li>Display active alarms and record them in the long-term.</li> <li>Internet connection for remote maintenance to be supplied by client.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

| Pos.          | Units    | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>5.14.3</b> | <b>1</b> | <p><b>Electrical Power Cabinet</b></p> <ul style="list-style-type: none"> <li>• Control and protection of motors and drives.</li> <li>• Cutoff switch with protection against overcurrents and differential failure.</li> <li>• Network analyzer integrated with record and display of data from SCADA.</li> <li>• Direct starter for motors (<math>P \leq 7,5 \text{ kW}</math>), Siemens, ABB or similar.</li> <li>• Slow starter for motors (<math>P &gt; 7,5 \text{ kW}</math> or less if it is required for the process), Siemens, ABB or similar.</li> <li>• High performance frequency variators. It is possible to add a line filter for drivers if the process requires it. ABB, Siemens or similar.</li> <li>• Control panels for the starters and variators. They are located in the frontal part of the electrical cabinet, in this way you can manipulate them without opening the cabinet.</li> <li>• Variators and starters communicated with the PLC by Profibus, Profinet, etherCAN or similar.</li> <li>• Terminal connection on the bottom of the electrical cabinet for areas under <math>35 \text{ mm}^2</math>. If the area is higher than <math>35 \text{ mm}^2</math>, the connection takes place in the driver shovel.</li> </ul> <p><i>The cabling of all the elements described in this offer to the control panel is not included.</i></p> |

| Pos.          | Units    | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>5.15</b>   |          | <b>Engineering, Documentation and Project Management</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>5.15.1</b> | <b>1</b> | <p><b>Engineering and Documentation</b></p> <p>The following documentation in English language is included in the price:</p> <ul style="list-style-type: none"> <li>✓ Loading drawing.</li> <li>✓ Layout drawing.</li> <li>✓ Electrical drawing.</li> <li>✓ Motor and instrument list.</li> <li>✓ P&amp;ID.</li> <li>✓ Operating instructions.</li> <li>✓ List of spare parts.</li> </ul> <p><b>Project Management</b></p> <p>Remote services of a Prodesa's Project Manager to coordinate the different stages of engineering, manufacturing, shipping, erection supervision and commissioning.</p> <p>Includes monthly visits during the engineering stage to coordinate the Balance of Plant (Building, civil works, utilities, etc.) with the client and contractors.</p> |

## **6. TRANSPORT, ERECTION SUPERVISION, COMMISSIONING**

### **6.1 TRANSPORT**

Prices are considered as DDP Hoquiam, Grays Harbor County (Washington, USA) according to INCOTERMS 2020 and in accordance with applicable duties, taxes and other costs related to import, in force at the moment of issuance of this offer.

In case of modifications on these costs:

- During the validity period of the offer or
- In case of project execution: during the period between the date of contract signature and the delivery date of the last material.

PRODESA reserves its right to revise the price of this DDP transport cost.

### **6.2 ERECTION SUPERVISION**

The erection supervision by a wide experienced chief is included in our scope of supply.

We have included in the scope of this offer the services of three-four (3-4) experienced technicians during six (6) months to support the erection/assembly.

The electrical and mechanical erection will be done with local fitters. The cost of those fitters is not included in this offer.

Additionally services will be “per diem” rates.

NOTE: Our works on site include all the travel expenses, the accommodation and the subsistence allowances of our technicians.

### **6.3 COMMISSIONING**

The commissioning consists on a cold start-up followed by a warm start-up. Our engineers will be onsite as required in order to carry out this operation.

The client will supply the utilities that will be specified before the commissioning.

For the commissioning, we have included the services of three (3) experienced technicians during four (4) months that will set the plant into operation and will train the staff.

Additionally services will be “per diem” rates.

The cold start-up phase is defined as all tasks and checks carried out in the equipment in dynamic and energized conditions (without raw material) in order to prepare the plant for the warm start-up (with product).

The end of the warm start-up is defined as the moment when the plant starts to produce pellets, so the Take Over. At this time, operational risks of the pellets plant is transferred to the client.

The training of the client’s staff will be in English language. The training will be together to the commissioning.

NOTE: Our works on site include all the travel expenses, the accommodation and the subsistence allowances of our technicians.

## 7. SUPPLY LIMITS

### **Product inlet**

|                      |              |              |
|----------------------|--------------|--------------|
| Ground chips:        | Truck dumper | (pos. 5.1.2) |
| Shavings and sawdust | Truck dumper | (pos. 5.1.2) |
| Fuel                 | Truck dumper | (pos 5.1.2)  |

### **Product outlet**

|          |               |                |
|----------|---------------|----------------|
| Pellets: | Pellet sifter | (pos. 5.12.15) |
|----------|---------------|----------------|

### **Thermal energy**

|        |              |             |
|--------|--------------|-------------|
| Fuel : | Truck dumper | (pos 5.1.2) |
|--------|--------------|-------------|

### **Electricity**

Electrical connection in our control panel.

### **Water**

Inlet water flanges to the different consumption points.

### **Compressed air**

Connections of different air consumption points: filters, coolers, etc.

### **Lubricant**

Connections of different lubricant consumption points.

## 8. PRICE

As this is a budget proposal, prices and scope of supply may be altered in further discussions with the client.

Prices are given in USD.

| POS.    | DESCRIPTION                                           | PRICE |
|---------|-------------------------------------------------------|-------|
| 5.1     | Raw material reception                                |       |
| 5.2     | Wet milling line                                      |       |
| 5.3     | Dryer feeding system                                  |       |
| 5.4     | Drying island – Drum dryer                            |       |
| 5.5     | Drying island – Heat energy System                    |       |
| 5.6     | Drying island – Wet electrostatic precipitator (WESP) |       |
| 5.7     | Drying island – Regenerative thermal oxidizer (RTO)   |       |
| 5.8     | Drying island – Refractory works                      |       |
| 5.9     | Dry product storage                                   |       |
| 5.10    | Dry milling line                                      |       |
| 5.11    | Dry and milled product storage                        |       |
| 5.12    | Pelleting line                                        |       |
| 5.13    | Dry milling and pelleting island RTO                  |       |
| 5.14    | Electrical equipment and control system               |       |
| 5.15    | Engineering, Documentation and Project Management     |       |
| 6.1     | Transport (DDP Delivery)                              |       |
| 6.2-6-3 | Erection Supervision and Commissioning                |       |
|         | <b>TOTAL</b>                                          |       |

VAT and taxes not included.

---

## 9. TERMS OF PAYMENT

---

**First payment: 30% at the signature of the contract.**

**The rest of the payments: 70%**

Resting 70 % will be done by Partial or Total Transferable and Irrevocable Letter of Credit, in these stages:

- 50% at the delivery of the main equipment, by divided payments in each partial delivery of main equipment.
- 10 % at the end of the mechanical erection.
- 5 % at the end of the cold start-up.
- 5% at the end of the warm start-up.

The following sentences are applicable to the Letter of Credit or any other terms of payment agreed with the client:

- It must be emitted not later than one (1) month after the first payment is done. In case of delay in the emission of this Letter of Credit, the project will be delayed in proportional time or higher depending on the circumstances of the manufacturing.
- In case of delay in the delivery of the equipment, erection or commissioning due to circumstances beyond PRODESA's control, will invoice the corresponding pending stages of the LC in 15 days of our communication to execute the works.

---

## 10. PRICE VALIDITY

---

This offer is valid for 1 month from the date of issuance.

---

## 11. DELIVERY TIME

---

To be confirmed.

---



## 12. NOT INCLUDED

Unless especially mentioned in our quotation, the following parts and services are not included in our price:

1. Building with concrete, foundations and civil works, and Building construction, painting and demolition works possibly necessary on existing buildings
2. Based plates.
3. Cabling from the different elements described in the contract to the electrical panels.
4. Manpower for mechanical and electrical erection.
5. Cranes, scaffolding and other elevating devices necessary for the erection and offloading.
6. Thermal and acoustic isolation or reduction equipment (if required and not mentioned).
7. Grounding, Grounding network and bonding grid.
8. Reactive energy compensation.
9. Harmonics reduction system.
10. Ducting for compressed air, water, steam etc.
11. Air compressor, water pumps, etc.
12. Heat trace cables.
13. Piping insulation.
14. Pipe bridges.
15. Spare parts and parts subject to wear.
16. Radiographs of welds.
17. Protecting measures for electrical motors installed outdoor.
18. Required operating materials (pressurised air, water, electricity, lubricants, hydraulic oil, etc.) and disposal of the same
19. Operating material or fuels for commissioning test running and/or performance testing.
20. Energy and electrical cabinets during the erection and commissioning.
21. Toilets, changing rooms, and material storage room during the work.
22. Containers and management of the waste generated during the assembly and start up.
23. Containers for rejected product (overs, fines, metals, heavy particles...).
24. The cost of testing, third parties certifications and adaptations to regulations different to the ones considered, as local regulations for example. There is no provision for technical support to these adaptations in case of required.
25. Expenses for tests, stamps and approvals eventually requested by the authority in the country of destination.
26. Emissions and noise tests.
27. Registration with the Local Authority.
28. Any travel expenses, accommodation, allowances, etc, derived from mandatory quarantines due to COVID19 (If applicable at time of travel). These costs will be invoiced according to Prodesa's Administration fares
29. All other services and supplies not mentioned in our description.

13. ANNEX

|         |                             |                           |
|---------|-----------------------------|---------------------------|
| Annex 1 | General Conditions of Sales | F.82.01.04 - ANNEX I, GCS |
|---------|-----------------------------|---------------------------|

# PORT OF GRAYS HARBOR WOOD PELLET PLANT

## Notice of Construction Permit Application

Prepared for  
Pacific Northwest Renewable Energy, LLC

July 2023





2801 Alaskan Way  
Suite 200  
Seattle, WA 98121  
206.789.9658 [info@esa.com](mailto:info@esa.com)  
206.789.9684 [www.esa.com](http://www.esa.com)

July 21, 2023

Olympic Region Clean Air Authority  
2940 Limited Lane NW  
Olympia, Washington 98502

**Subject:** NOC Application Submittal

Dear Mark Goodin:

On behalf of Pacific Northwest Renewable Energy, LLC, Environmental Science Associates is submitting a Notice of Construction application for a wood pellet manufacturing facility to be located in Hoquiam, Washington. A signed Form 1 and application fee will be provided separately.

Sincerely,

Ed Warner  
Air Quality Analyst

Received  
JUL 24 2023

ORCAA

# PORT OF GRAYS HARBOR WOOD PELLET PLANT

## Notice of Construction Permit Application

Prepared for  
Pacific Northwest Renewable Energy, LLC

July 2023

2801 Alaskan Way  
Suite 200  
Seattle, WA 98121  
206.789.9658  
www.esassoc.com



|             |                   |               |
|-------------|-------------------|---------------|
| Atlanta     | Palm Beach County | San Diego     |
| Bend        | Pasadena          | San Francisco |
| Irvine      | Pensacola         | San Jose      |
| Los Angeles | Petaluma          | Sarasota      |
| Mobile      | Portland          | Seattle       |
| Oakland     | Rancho Cucamonga  | Tampa         |
| Orlando     | Sacramento        | Thousand Oaks |

**OUR COMMITMENT TO SUSTAINABILITY** | ESA helps a variety of public and private sector clients plan and prepare for climate change and emerging regulations that limit GHG emissions. ESA is a registered assessor with the California Climate Action Registry, a Climate Leader, and founding reporter for the Climate Registry. ESA is also a corporate member of the U.S. Green Building Council and the Business Council on Climate Change (BC3). Internally, ESA has adopted a Sustainability Vision and Policy Statement and a plan to reduce waste and energy within our operations. This document was produced using recycled paper.

# TABLE OF CONTENTS

---

## Port of Grays Harbor Wood Pellet Plant, Notice of Construction Permit Application

|                                                                                                 | <u>Page</u> |
|-------------------------------------------------------------------------------------------------|-------------|
| <b>1 Executive Summary.....</b>                                                                 | <b>1</b>    |
| <b>2 Facility Description.....</b>                                                              | <b>2</b>    |
| 2.1 Site Description.....                                                                       | 2           |
| 2.2 Process Description.....                                                                    | 2           |
| <b>3 Emission Calculations .....</b>                                                            | <b>6</b>    |
| <b>4 Regulatory Applicability Analysis .....</b>                                                | <b>7</b>    |
| 4.1 Applicability of Notice of Construction.....                                                | 7           |
| 4.2 Prevention of Significant Deterioration (Major New Source Review) .....                     | 8           |
| 4.3 Title V Operating Permit Program.....                                                       | 8           |
| 4.4 New Source Performance Standards .....                                                      | 8           |
| 4.5 National Emissions Standards for Hazardous Air Pollutants .....                             | 9           |
| 4.6 General Air Pollution Control Regulations .....                                             | 11          |
| 4.7 Washington Toxic Air Pollutant Regulations .....                                            | 11          |
| <b>5 Best Available Control Technology .....</b>                                                | <b>13</b>   |
| 5.1 BACT Methodology.....                                                                       | 14          |
| 5.2 BACT Analysis for Raw-Material Receiving .....                                              | 15          |
| 5.3 BACT Analysis for Chips Cleaning Line and Wet Hammer Mills .....                            | 16          |
| 5.4 BACT/tBACT Analysis for Drying Line .....                                                   | 17          |
| 5.5 BACT/tBACT Analysis for Combined Exhaust from the Dry Hammer Mills<br>and Pellet Line ..... | 21          |
| 5.6 BACT Analysis for Intermediate and Final Product Storage Silos and<br>Truck Loadout.....    | 23          |
| 5.7 BACT Analysis for Vehicle Traffic .....                                                     | 23          |
| 5.8 BACT/tBACT Analysis for Emergency Generator .....                                           | 24          |
| <b>6 Air Dispersion Modeling Methodology .....</b>                                              | <b>25</b>   |
| 6.1 Model Selection .....                                                                       | 25          |
| 6.2 Meteorological Data.....                                                                    | 25          |
| 6.3 Coordinate System .....                                                                     | 26          |
| 6.4 Terrain Elevations.....                                                                     | 26          |
| 6.5 Urban/Rural Determination .....                                                             | 27          |
| 6.6 Receptor Grids.....                                                                         | 27          |
| 6.7 Building Downwash .....                                                                     | 30          |
| 6.8 Source Types and Parameters .....                                                           | 31          |
| <b>7 Air Dispersion Modeling Analysis .....</b>                                                 | <b>32</b>   |
| 7.1 Toxic Air Pollutant Modeling .....                                                          | 32          |
| 7.2 National Ambient Air Quality Standards Modeling .....                                       | 33          |

**Page****List of Figures**

|          |                                                            |    |
|----------|------------------------------------------------------------|----|
| Figure 1 | General Location of the Proposed Wood Pellet Facility..... | 2  |
| Figure 2 | General Facility Layout.....                               | 3  |
| Figure 3 | Zoomed-Out Receptor Grid .....                             | 28 |
| Figure 4 | Zoomed-In Receptor Grid .....                              | 29 |
| Figure 5 | Facility Fence Line.....                                   | 29 |

**List of Tables**

|         |                                                                      |    |
|---------|----------------------------------------------------------------------|----|
| Table 1 | Facility-wide Potential Emissions.....                               | 7  |
| Table 2 | Results of First-Tier Review for Toxic Air Pollutant Emissions ..... | 13 |
| Table 3 | Bowerman Airport Surface Roughness.....                              | 26 |
| Table 4 | Building Parameters .....                                            | 30 |
| Table 5 | Point Source Parameters.....                                         | 31 |
| Table 6 | Volume and Area Source Parameters .....                              | 32 |
| Table 7 | Modeling Results for Toxic Air Pollutants .....                      | 33 |
| Table 8 | Background Concentrations .....                                      | 34 |
| Table 9 | National Ambient Air Quality Standards Model Results .....           | 34 |

**Appendices**

- A. NOC Application Forms and SEPA Documentation
- B. Facility Layout and Process Flow Diagrams
- C. Emission Calculations
- D. Vendor Information
- E. Meteorological Data
- F. Model Inputs and Outputs

**Acronyms and Other Abbreviations**

| <b>Abbreviation</b> | <b>Definition</b>                    |
|---------------------|--------------------------------------|
| °C                  | degrees Celsius                      |
| °F                  | degrees Fahrenheit                   |
| K                   | degrees Kelvin                       |
| ASIL                | Acceptable Source Impact Level       |
| BACT                | Best Available Control Technology    |
| CAS                 | Chemical Abstract Service            |
| CFR                 | Code of Federal Regulations          |
| CI                  | compression ignition                 |
| CO                  | carbon monoxide                      |
| EPA                 | U.S. Environmental Protection Agency |
| HAP                 | hazardous air pollutants             |
| ICE                 | internal combustion engine           |
| lb/hr               | pounds per hour                      |



| <b>Abbreviation</b> | <b>Definition</b>                                                                                                                                 |
|---------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|
| m                   | meters                                                                                                                                            |
| m/s                 | meters per second                                                                                                                                 |
| MACT                | Maximum Achievable Control Technology                                                                                                             |
| MMBtu/hr            | million British thermal units per hour                                                                                                            |
| mph                 | miles per hour                                                                                                                                    |
| NAAQS               | national ambient air quality standards                                                                                                            |
| NED                 | National Elevation Dataset                                                                                                                        |
| NESHAP              | National Emissions Standards for Hazardous Air Pollutants                                                                                         |
| NO <sub>2</sub>     | nitrogen dioxide                                                                                                                                  |
| NOC                 | Notice of Construction                                                                                                                            |
| NO <sub>x</sub>     | nitrogen oxides                                                                                                                                   |
| NSPS                | New Source Performance Standards                                                                                                                  |
| ORCAA               | Olympic Region Clean Air Agency                                                                                                                   |
| PM                  | particulate matter                                                                                                                                |
| PM <sub>2.5</sub>   | particulate matter less than or equal to 2.5 microns in diameter                                                                                  |
| PM <sub>10</sub>    | particulate matter less than or equal to 10 microns in diameter                                                                                   |
| PNWRE               | Pacific Northwest Renewable Energy                                                                                                                |
| PSD                 | Prevention of Significant Deterioration                                                                                                           |
| PTE                 | potential to emit                                                                                                                                 |
| RACT                | Reasonably Available Control Technology                                                                                                           |
| RCO                 | regenerative catalytic oxidizer                                                                                                                   |
| RICE                | reciprocating internal combustion engine                                                                                                          |
| RBLC                | Reasonably Available Control Technology (RACT)/Best Available Control Technology (BACT)/Lowest Achievable Emission Reduction (LAER) Clearinghouse |
| RTO                 | regenerative thermal oxidizer                                                                                                                     |
| SIL                 | Significant Impact level                                                                                                                          |
| SO <sub>2</sub>     | sulfur dioxide                                                                                                                                    |
| SQER                | Small Quantity Emission Rate                                                                                                                      |
| TAP                 | toxic air pollutant                                                                                                                               |
| tBACT               | Best Available Control Technology for toxic air pollutants associated with a project                                                              |
| TPY                 | tons per year                                                                                                                                     |
| UTM                 | Universal Transverse Mercator                                                                                                                     |
| VOC                 | volatile organic compounds                                                                                                                        |
| WAC                 | Washington Administrative Code                                                                                                                    |
| WBAN                | Weather-Bureau-Army-Navy                                                                                                                          |
| WDOE                | Washington Department of Ecology                                                                                                                  |
| WESP                | wet electrostatic precipitator                                                                                                                    |
| Willis Enterprises  | Willis Enterprises Moon Island Chip Mill                                                                                                          |

This page intentionally left blank

# PORT OF GRAYS HARBOR WOOD PELLET PLANT

---

## Notice of Construction Permit Application

### 1 Executive Summary

Pacific Northwest Renewable Energy, LLC (PNWRE) is proposing to construct and operate a wood pellet facility on an approximately 60-acre parcel in the city of Hoquiam, Washington. The facility would include a wood biomass pellet plant, storage silos, and a new conveyor that would connect to an existing conveyor at the Willis Enterprises Moon Island Chip Mill (Willis Enterprises).

The processing of woody biomass at the proposed PNWRE facility would involve the use of three truck tippers; a chips cleaning line with air emissions controlled by a cyclone; two wet hammer mills with air emissions controlled by cyclones; one hog fuel furnace and dryer with air emissions controlled by a wet electrostatic precipitator (WESP) and a regenerative thermal oxidizer (RTO); four dry hammer mills, each with air emissions controlled by a combined cyclone and fabric filter system (cyclofilter); 12 pellet mills in production and two cooling lines with air emissions controlled by baghouses; a regenerative catalytic oxidizer (RCO) controlling air emissions from the combined dry hammer mills and pellet cooling lines; five wood pellet storage silos; and a covered conveyor system to deliver wood pellets to the existing Willis Enterprises conveyance system and ship loadout facility. The wet raw materials for pellet production and hog fuel for the furnace would be delivered to the facility via truck. The facility would have the capacity to process up to 440,800 tons per year (TPY) of dried wood pellets.

The project would induce emissions of air contaminants in the region, thereby requiring an approved Notice of Construction (NOC) application from the Olympic Region Clean Air Agency (ORCAA). The PNWRE facility is not expected to generate criteria pollutant emissions in quantities that would trigger the need for a Prevention of Significant Deterioration (PSD) permit but is anticipated to trigger the need for a Title V Air Operating Permit. The facility would be an area source of hazardous air pollutants (HAPs), as potential emissions of each individual HAP would be less than the applicable major source threshold, 10 TPY. Total HAP are less than the combined HAP major-source threshold, 25 TPY.

This report serves as the NOC permit application required by ORCAA. The purpose of this application is to document an emission inventory for the PNWRE facility, review relevant permitting programs and equipment standards, and compare project-specific air modeling results to applicable thresholds. General forms required by ORCAA for an NOC application are found in **Appendix A**.

## 2 Facility Description

### 2.1 Site Description

Pacific Northwest Renewable Energy (PNWRE) is proposing to construct and operate a wood pellet facility located on an approximately 60-acre parcel in the city of Hoquiam, Washington. The facility would be adjacent to the Willis Enterprises Moon Island Chip Mill (Willis Enterprises) and near Terminal 3 at the Port of Grays Harbor. Hoquiam is in Grays Harbor County and falls under the jurisdiction of the Olympic Region Clean Air Agency (ORCAA). The area has a moderate coastal climate with mild summer and winter temperatures and plentiful rain. The county is currently designated as attainment/unclassifiable for all federal ambient air quality standards for criteria pollutants.<sup>1</sup> **Figure 1** shows the general location of the proposed PNWRE facility.



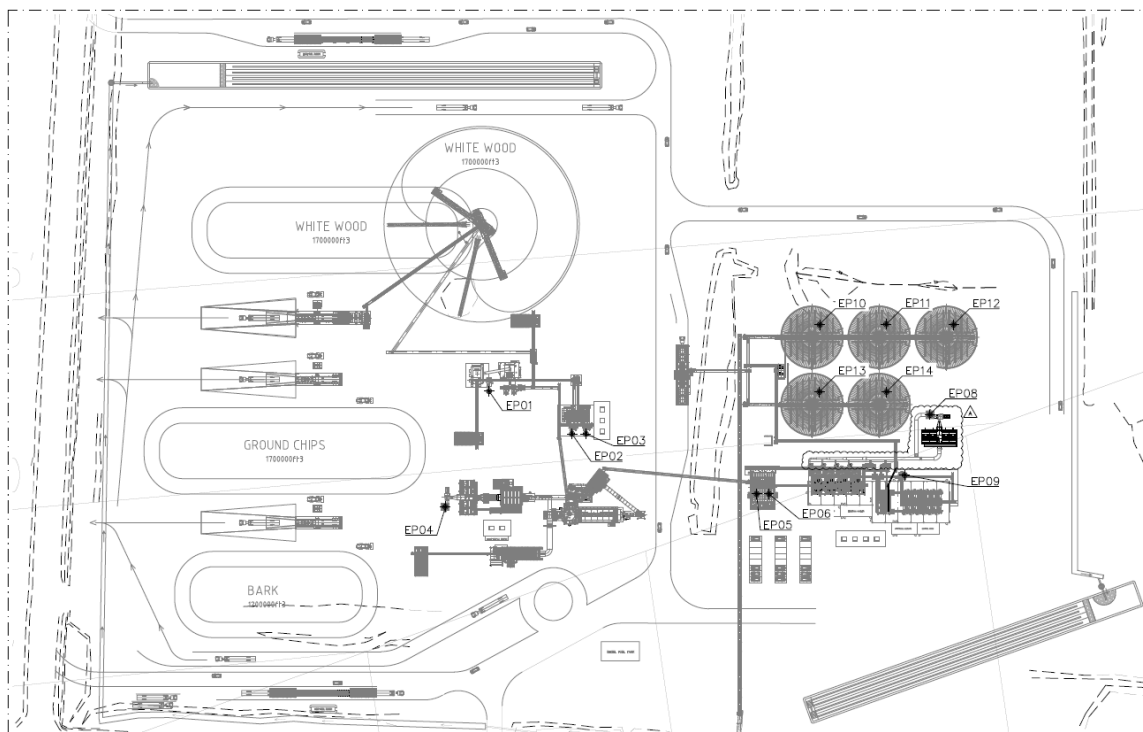
**Figure 1** General Location of the Proposed Wood Pellet Facility

### 2.2 Process Description

The processing of wood pellets at the proposed PNWRE facility would involve the use of three truck tippers with outdoor storage piles; a chip cleaning line; two wet hammer mills; one hog fuel furnace and dryer with air emissions controlled by a wet electrostatic precipitator (WESP) and a regenerative thermal oxidizer (RTO); four dry hammer mills; 12 pelletizers; two pellet coolers; a regenerative catalytic oxidizer (RCO) that controls emissions from the dry hammer mills and

<sup>1</sup> U.S. Environmental Protection Agency. 2021. "Status of Washington Designated Areas." Available: [https://www3.epa.gov/airquality/urbanair/sipstatus/reports/wa\\_areabypoll.html](https://www3.epa.gov/airquality/urbanair/sipstatus/reports/wa_areabypoll.html). Last updated March 12, 2021. Accessed May 31, 2023.

pelletizers; five pellet storage silos; and a conveyance system for product loadout. The woody biomass raw materials for processing and hog fuel for the furnace would be delivered via truck. A new conveyor would transport wood pellets from the silos and connect them to the existing Willis Enterprises conveyor system located on the Willis Enterprises chip mill site. Pellets would then be conveyed to the Port of Grays Harbor Terminal 3 for loading onto vessels. The facility would be designed to produce, store, and export up to 440,800 short tons per year (TPY) of wood pellets at 8% moisture content. While the facility's operational plan is based on 8,000 hours per year, air quality impacts are calculated based on 8,760 hours per year. Facility layout and process flow diagrams are found in **Appendix B**.



**Figure 2 General Facility Layout**

### 2.2.1 Raw-Material Receiving and Storage Area

The manufacture of wood pellets would start with the raw woody biomass consisting of forest residues (ground chips) and mill residues (white wood), which would be delivered by truck. Trucks delivering ground chips and white wood would be emptied via dedicated truck tipplers while front-end loaders would form outdoor storage piles of these materials. Biomass fuel or bark, also referred to as “hog fuel,” would likewise be delivered via truck and a front-end loader would form an outdoor storage pile. These storage piles are expected to be up to 1.7 acres each in size. PNWRE is also considering the use of a radial stacker/reclaimer for the handling, stockpiling, and transfer of white wood after it has been deposited by the truck tipper. This method would generate the same amount of emissions as the material handling and stockpiling of white wood via front-end loader, but it would eliminate emissions associated with front-end loader traffic for this material. The analysis herein presents emissions for the receiving and storage of white wood as if a front-end loader were being used, to conservatively represent the

highest potential emissions impact; however, PNWRE may implement the radial stack/reclaimer instead, depending on economic conditions.

To minimize the dust emissions from vehicle traffic, the PNWRE facility would implement a dust control plan. The plan would include abiding by a 10 miles per hour (mph) posted speed limit for all vehicles and heavy equipment, regularly applying water on road surfaces via water truck, and using a pickup broom truck as needed.

Front-end loaders would transfer raw materials and biomass fuel to dedicated walking-floor bins. The walking floors would move the materials to the next phase in their processing. From this point onward, all raw material handling processes would be fully enclosed. The ground-chips walking floor would discharge to a chain conveyor that would feed the chip cleaning line. The white wood walking floor would discharge to a disc screen that would separate larger pieces for further sizing in the wet hammer mills, with the remaining product routed to the dryer. The bark walking floor would route the biomass fuel to the furnace.

### **2.2.2 Chip Cleaning Line**

Ground chips created from forest residuals include impurities such as sand and stone that must be separated from the wood. The chip cleaning line would use a series of scalper rolls to remove these impurities and organize the chips by size. The smallest sizes, or fines, would be routed to the dryer feeding system, while the intermediate fraction would be sent to the wet hammer mills. A cyclone would be used to mitigate particulate emissions, while also recovering airborne product from the scalping process to combine it with the fines routed to the dryer feeding system. The oversized pieces and impurities would be discharged to a container as waste.

### **2.2.3 Wet Hammer Mills**

Wet hammer mills would be used to reduce the size of the raw materials to facilitate optimum drying. They are referred to as “wet hammer mills” because the raw materials would not have been dried yet. Two identical hammer mills in parallel would be used to reduce the size of the chips. Each wet hammer mill would use a cyclone to mitigate particulate emissions, while also recovering product to route to the dryer feeding system. After the chips pass through the wet hammer mills, they would be discharged downward by mechanical and pneumatic systems to conveyors that would transport them to the dryer.

### **2.2.4 Drying Line**

The drying line is the heart of the proposed PNWRE facility. The drying line would include the furnace, drum dryer, and emissions control system. The furnace would combust hog fuel to provide heat for the dryer and would have a maximum heat input capacity of 164.81 million British thermal units per hour (MMBtu/hr). Wet raw materials would be staged in a metering bin before being fed to the drum dryer inlet. Hot flue gas from the furnace would be routed through the drum dryer, where the heat would dry the raw material from approximately 45 percent moisture content to a target 10 percent final moisture content. Dried material would be conveyed from the drum dryer discharge through a pair of high-efficiency cyclones in parallel that would separate the dried wood material from the moisture-rich exhaust gas stream. The exhaust stream then either would be recycled back through the drum dryer or would pass through the emissions

control system before emitting from a stack into the atmosphere. The dried material would be conveyed to a dry-product intermediate-storage silo.

The emissions control system for the drying line would consist of cyclones and a WESP for controlling emissions of particulate matter (PM); and an RTO for mitigating emissions of volatile organic compounds (VOC), carbon monoxide (CO), and organic HAP and toxic air pollutants (TAPs). A WESP controls PM using electrical forces to remove particles entrained within an exhaust stream onto collector surfaces such as pipes or plates within the WESP. The particulate is washed from the collector surfaces with liquid spray for collection and disposal. Cyclones are located prior to the WESP to recover airborne product and reduce the inlet PM loading to the WESP. An RTO is a type of thermal incinerator or oxidizer that destroys VOC and condensable organics by burning them at high temperatures, while oxidizing the CO in the exhaust to carbon dioxide.

### **2.2.5 Dry-Product Intermediate Storage**

Dried material would pass from the dryer into the dry-product intermediate-storage silo. Two dust filter-equipped vents in this vessel (EP-05 and EP-06) would emit exhaust to the atmosphere. The retention time in the silo would allow the material moisture content to homogenize, which would help to optimize the pelletizing process. A chain conveyor would transport the product from the outlet of the silo to the dry hammer mills.

### **2.2.6 Dry Hammer Mills**

Four dry hammer mills would process the dried material to the desired size. Each hammer mill would emit exhaust through a combined cyclone and fabric filter device (cyclofilter) for recovering product and controlling particulate emissions. The exhaust streams would then be combined with exhaust streams from the pellet coolers, then passed through an RCO for VOC control before emitting from a stack to the atmosphere. An RCO functions like an RTO to destroy VOC and condensable TAP via oxidation; however, it uses a catalyst material rather than ceramic material to achieve oxidation at lower temperatures.

### **2.2.7 Milled Dry-Product Intermediate Storage**

From the dry hammer mills, the dried and milled product would be conveyed to the milled dry-product intermediate-storage silo with a dust filter-equipped vent (EP-09). The dried product would be offered additional retention time for achieving a more homogenous moisture content, a key factor for achieving the desired quality in the final product. A chain conveyor would transport the product from the outlet of the silo to the pellet mill hoppers that would independently feed each pellet mill.

### **2.2.8 Pellet Mills**

There would be two pellet lines consisting of six pellet mills each, for a total of 12 pellet mills. In each pellet mill, rollers would push the material through the holes of a die plate. Knives on the exterior of the die plate would cut the wood pellets from the plate once the pellets achieve the required length. The temperature of a freshly produced pellet is around 200 degrees Fahrenheit (°F). Therefore, each of the two pellet lines would discharge into a pellet cooler where the

material would flow countercurrent to a stream of ambient air introduced in the cooler. The air flow reduces the temperature of the wood pellets at the point of pellet discharge. Each pellet cooler would be equipped with a baghouse to remove dust from the exhaust stream. The exhaust streams from the two pellet cooler baghouses would be combined with the exhaust streams from the dry hammer mills, then passed through an RCO for VOC control before emitting from a stack to the atmosphere.

### **2.2.9 Pellet Silos and Loadout**

Pellets would move from the pellet coolers to the 5 pellet silos. The total combined capacity of the pellet silos would be approximately 60,000 short tons. Pellets would be aggregated in the silos until enough volume is accumulated for bulk shipments. The silos would utilize aeration fans and venting to maintain low pellet temperature for final shipment. An automated enclosed conveyor would draw pellets from the silos evenly according to loading schedules and transport them to the neighboring Willis Enterprises' existing conveyors and vessel loadout facilities. Willis Enterprises operates under an RC2-class ORCAA registration (source number 2112, file number 647). PNWRE would also have the ability to deliver pellets via a truck unloading system; however, this system would be used only in special circumstances. PNWRE proposes no more than 10 loaded trucks per day and 32,000 tons per year of truck loadout utilization.

### **2.2.10 Emergency Equipment**

An emergency backup diesel generator would be available for use during periods of power loss. The generator would be no larger than 300-kilowatt capacity.

## **3 Emission Calculations**

**Table 1** identifies the facility-wide criteria pollutant emissions from point sources for the proposed PNWRE facility. The emissions are based on operation at maximum capacity assuming compliance with the proposed emissions limitations, consistent with the definition for potential to emit (PTE) from ORCAA Regulation 1.4. The table includes point-source emissions only and excludes fugitive emissions because wood pellet production is not among the 28 listed categories of PSD regulations with lower major source thresholds (100 TPY) that require including fugitive emissions for comparison to major-source regulatory thresholds. Although the proposed facility would not exceed the PSD major-source threshold of 250 TPY for any criteria pollutant, some pollutants would exceed the Title V major-source threshold of 100 TPY. PNWRE would apply for the required Title V Operating Permit within 12 months of commencing operation. Detailed emissions calculations are found in **Appendix C**.



**TABLE 1**  
**FACILITY-WIDE POTENTIAL EMISSIONS**

| Pollutant                            | Facility-wide<br>Point-Source<br>PTE<br>(TPY) | Title V Major-<br>Source<br>Threshold<br>(TPY) | Title V Major?<br>(Yes/No) | PSD Major-<br>Source<br>Threshold<br>(TPY) | PSD Major?<br>(Yes/No) |
|--------------------------------------|-----------------------------------------------|------------------------------------------------|----------------------------|--------------------------------------------|------------------------|
| Filterable PM                        | 108                                           | N/A                                            | N/A                        | 250                                        | No                     |
| Total PM <sub>10</sub> <sup>1</sup>  | 88                                            | 100                                            | No                         | 250                                        | No                     |
| Total PM <sub>2.5</sub> <sup>1</sup> | 71                                            | 100                                            | No                         | 250                                        | No                     |
| NO <sub>x</sub>                      | 230                                           | 100                                            | Yes                        | 250                                        | No                     |
| CO                                   | 185                                           | 100                                            | Yes                        | 250                                        | No                     |
| VOC                                  | 67                                            | 100                                            | No                         | 250                                        | No                     |
| SO <sub>2</sub>                      | 18                                            | 100                                            | No                         | 250                                        | No                     |
| CO <sub>2</sub> e                    | 163,592                                       | N/A                                            | N/A                        | 100,000                                    | No <sup>2</sup>        |
| Total HAP                            | 1.32                                          | 25                                             | No                         | N/A                                        | N/A                    |
| Max Individual HAP <sup>3</sup>      | 0.31                                          | 10                                             | No                         | N/A                                        | N/A                    |

NOTES: CO = carbon monoxide; CO<sub>2</sub>e = carbon dioxide equivalent; HAP = hazardous air pollutant; N/A = not applicable; NO<sub>x</sub> = nitrogen oxides; PM = particulate matter; PM<sub>2.5</sub> = particulate matter 2.5 microns or less in diameter; PM<sub>10</sub> = particulate matter 10 microns or less in diameter; PSD = Prevention of Significant Deterioration; PTE = potential to emit; SO<sub>2</sub> = sulfur dioxide; TPY = tons per year; VOC = volatile organic compound

<sup>1</sup> Total PM<sub>10</sub> and PM<sub>2.5</sub> include condensable fraction.

<sup>2</sup> CO<sub>2</sub>e cannot trigger PSD unless already triggered by another pollutant.

<sup>3</sup> The maximum individual HAP is formaldehyde.

## 4 Regulatory Applicability Analysis

This section identifies and discusses the federal and state air quality regulations that potentially apply to the stationary sources associated with this project.

### 4.1 Applicability of Notice of Construction

ORCAA Regulations Rule 6.1 states that an approved NOC permit application is required for construction, installation, or establishment of any stationary source and applies to the proposed PNWRE wood pellet facility. The NOC forms required by ORCAA can be found in **Appendix A**. As outlined in ORCAA Rule 6.1.4, for the NOC application to be approved, the applicant must demonstrate that Best Available Control Technology (BACT) has been employed for all air pollutants. In addition, TAP emissions regulated under Washington Administrative Code (WAC) Chapter 173-460 must meet the applicable requirements of that program. The facility shall comply with all applicable federal regulations such as New Source Performance Standards (NSPS) and National Emissions Standards for Hazardous Air Pollutants (NESHAP). This NOC application has been prepared to demonstrate that the proposed PNWRE facility would comply with all requirements in ORCAA Rule 6.1.4 and allow ORCAA to issue an air permit.

## 4.2 Prevention of Significant Deterioration (Major New Source Review)

The Washington Department of Ecology (WDOE) administers the state PSD air quality permitting program that applies to new sources or modifications that are considered “major.” The PSD program defines a major new source or a major modification as having potential emissions of any pollutant regulated under the program that exceeds 250 TPY.

As discussed in Section 3 of this report, the PNWRE wood pellet facility would not emit any criteria pollutant at a rate exceeding 250 TPY; therefore, the project is not required to submit an application for a PSD permit. This NOC application demonstrates that criteria pollutants would not be emitted in quantities that would trigger the PSD program.

## 4.3 Title V Operating Permit Program

Title V of the federal Clean Air Act requires facilities with the potential to emit more than 100 tons of a regulated criteria pollutant, 10 tons of a single HAP, or 25 tons of all HAPs combined on an annual basis, to obtain a Title V Air Operating Permit. As described in Section 3 of this report, facility-wide potential emissions are expected to exceed 100 TPY for a criteria pollutant; therefore, a Title V Air Operating Permit would be required. PNWRE would submit a Title V Air Operating Permit application within 12 months of the commencement of operation.

## 4.4 New Source Performance Standards

The NSPS are federal emissions standards applied to specific categories of stationary sources that are constructed, modified, or reconstructed after the standard was proposed. These standards are found in Title 40, Part 60 of the Code of Federal Regulations (CFR). The NSPS represent the minimum level of control that is required on a new or modified source. The following sections discuss some potentially applicable NSPS regulations. Note that some of the discussions demonstrate that the NSPS are not applicable to the PNWRE wood pellet facility.

### 4.4.1 40 CFR 60 Subpart A – General Provisions

Elements of Subpart A apply to each affected facility under any NSPS rule, as specified in each NSPS source category standard. Subpart A contains general requirements for notifications, monitoring, performance testing, reporting, recordkeeping, operation, and maintenance.

### 4.4.2 40 CFR 60 Subpart Db – Industrial, Commercial, and Institutional Steam Generating Units

This NSPS applies to industrial, commercial, and institutional steam generating units with a heat input greater than 100 MMBtu/hr that began construction, modification, or reconstruction after June 19, 1984. While this regulation applies to wood-burning combustion units, it is focused on combustion used to produce steam or heat water. A steam generating unit is defined within this regulation as a device that combusts any fuel or byproduct/waste and produces steam or heats water or heats any heat transfer medium. The burner in the dryer includes one 165 MMBtu/hr burner firing biomass (wood materials) to provide heat for the dryer. The burner would generate heat for the direct drying of wood materials only, and no heat from the burner would be utilized

to generate steam, heat water, or heat any heat transfer medium. PNWRE does not propose installation of any steam-generating units at the wood pellet facility; therefore, the facility would not be subject to NSPS Subpart Db.

#### **4.4.3 40 CFR 60 Subpart CCCC – Commercial and Industrial Solid Waste Incineration Units**

This NSPS applies to commercial and solid waste incineration units (CISWI) and air curtain incinerators (ACI). A CISWI is defined within this regulation as any distinct operating unit at a commercial or industrial facility that combusts a solid waste meeting the definition in 40 CFR Part 241. As stated in §241.2, traditional fuels that are produced as fuels and are unused products that have not been discarded are not solid wastes, including cellulosic biomass (virgin wood). The traditional fuels definition further states that clean cellulosic biomass, defined in §241.2 to include forest-derived biomass such as bark and hogged fuel, is a fuel product. Therefore, the bark that would be used as fuel for the facility furnace is not solid waste and the furnace is not a CISWI. An ACI is defined within this NSPS as an incinerator that operates by forcefully projecting a curtain of air across an open chamber or pit in which combustion occurs. There are no proposed ACI for the PNWRE wood pellet facility. The facility would not be subject to NSPS CCCC.

#### **4.4.4 40 CFR 60 Subpart IIII – Stationary Compression Ignition Internal Combustion Engines**

This NSPS applies to manufacturers, owners, and operations of certain stationary compression ignition (CI) internal combustion engines (ICEs). PNWRE is proposing to operate a CI ICE emergency generator. Therefore, NSPS IIII is applicable to the CI ICE at the facility. PNWRE proposes to operate the CI ICE as an emergency engine as defined in this regulation. The facility shall comply with the following requirements:

- Use only ultra-low-sulfur diesel.
- Operate, maintain, install, and configure the engines per the manufacturer’s instructions.
- Maintain a copy of the U.S. Environmental Protection Agency (EPA) certificate for the engine.
- Ensure that the engine is equipped with a non-resettable hour meter and that run logs noting the reason for operation are maintained.
- Limit maintenance and readiness testing to 100 hours per year. (There is no time limit on the use of emergency stationary ICE in emergency situations.)

### **4.5 National Emissions Standards for Hazardous Air Pollutants**

The NESHAP are emission standards for HAPs from specific source categories. These regulations generally specify the Maximum Achievable Control Technology (MACT) that must be applied for a given industry category. Consequently, these rules are often called “MACT standards.” These federal regulations are found in 40 CFR Parts 61 and 63 and are applicable to major and area sources of HAPs. A “HAP major source” is defined as a facility with potential emissions exceeding 25 TPY for total HAPs or potential emissions exceeding 10 TPY for any

individual HAP. An “area source” is a stationary source of HAPs that is not a major source. As identified in Table 1, the proposed PNWRE wood pellet facility would be an area source of HAP emissions because maximum individual HAP emissions would be less than 10 TPY and total HAP emissions would be less than 25 TPY. The following sections discuss some potentially applicable NESHAP regulations. Note that some of the discussions demonstrate that the NESHAP is not applicable to the facility.

#### **4.5.1 40 CFR 63 Subpart A – General Provisions**

All affected sources are subject to the general provisions of 40 CFR 63 Subpart A unless specifically excluded by the source-specific NESHAP. Subpart A requires initial notification and performance testing, recordkeeping, and monitoring; provides reference methods; and mandates general control device requirements all other subparts as applicable.

#### **4.5.2 40 CFR 63 Subpart DDDD – Plywood and Composite Wood Products**

This regulation applies to major sources of HAPs that manufacture plywood or composite wood products by bonding wood materials (e.g., fibers, particles, strands, veneers) or agricultural fiber, generally with resin under heat and pressure, to form a structural panel or engineered wood product. The PNWRE wood pellet facility would not use any form of resin or manufacture structural panels or any similar type of wood product (i.e., veneer, particleboard, fiberboard, kiln-dried lumber). Furthermore, the facility would be an area source of HAPs; therefore, NESHAP Subpart DDDD is not applicable to the proposed facility.

#### **4.5.3 40 CFR 63 Subpart DDDDD – Industrial, Commercial, and Institutional Boilers and Process Heaters**

This regulation applies to solid, liquid, and gaseous-fired boilers and process heaters at major sources of HAP emissions. This regulation includes the following language in the definition of a process heater: “an enclosed device using controlled flame, and the unit’s primary purpose is to transfer heat indirectly to a process material... Process heaters are devices in which the combustion gases do not come into direct contact with the process materials.” The combustion gases from the dryer burner at the PNWRE facility’s drying line would be in direct contact with the wood materials; therefore, the dryer burner does not meet the definition of a process heater. Boilers are defined within this regulation as an enclosed device using controlled flame combustion for the primary purpose of recovering thermal energy in the form of steam or hot water. The furnace for the dryer would not be used for generating steam or hot water; therefore, it does not meet the definition of a boiler. Furthermore, the PNWRE facility would be an area source of HAP emissions. For these reasons, the proposed facility is not subject to Subpart DDDDD.

#### **4.5.4 40 CFR 63 Subpart JJJJJ – Industrial, Commercial, and Institutional Boilers Area Sources**

This regulation applies to industrial, commercial, and institutional boilers located at area sources of HAPs. Boilers are defined within this regulation as an enclosed device using controlled flame combustion for the primary purpose of recovering thermal energy in the form of steam or hot water. The furnace for the dryer would not be used for generating steam or hot water; therefore,

it does not meet the definition of a boiler. The PNWRE facility would be an area source of HAP emissions; however, there would be no boilers that meet the applicability criteria, so this regulation would not apply.

#### **4.5.5 40 CFR 63 Subpart QQQQQQ – Wood Preserving Area Sources**

This regulation applies to wood preserving operations located at area sources of HAPs. A “wood preserving operation” is defined by Subpart QQQQQQ as a pressure treatment process with use of a wood preservative containing chromium, arsenic, dioxins, or methylene chloride, where the preservative is applied to the wood product inside a retort or similarly closed vessel. The PNWRE facility would not use any wood preservatives in the production of wood pellets; therefore, this regulation would not apply.

#### **4.5.6 40 CFR 63 Subpart ZZZZ – Stationary Reciprocating Internal Combustion Engines**

This regulation applies to reciprocating internal combustion engines (RICE) at both major and area sources of HAPs. The PNWRE facility would operate one diesel-fired emergency generator that would meet the applicability criteria of this regulation. The emergency CI RICE would have a maximum rated design power greater than 25 horsepower and a construction date after January 1, 2006; therefore, these engines would be considered new units under the rule. New CI RICE at area sources of HAPs must meet the requirements of this rule by meeting the requirements of 40 CFR 60 Subpart IIII; no other requirements from 40 CFR 63 Subpart ZZZZ apply to the emergency CI RICE.

### **4.6 General Air Pollution Control Regulations**

ORCAA Regulation 8 establishes general emission standards that apply to all emission units, including those at the project site. PNWRE would comply with these general emissions standards. The relevant general emission standards are as follows:

- Rule 8.2 General Standards for Maximum Visual Emissions – opacity from any emissions unit (with some exceptions) is limited to 20 percent.
- Rule 8.3 General Standards for Maximum Particulate Matter – PM emissions are limited to 0.10 grains per dry standard cubic foot of gas for most sources, and reasonable precautions must be taken to prevent fugitive particulate material from becoming airborne. This rule also prohibits PM fallout that negatively affects adjacent properties.

### **4.7 Washington Toxic Air Pollutant Regulations**

In Washington, all new and modified sources emitting TAPs must show compliance with the Washington TAP program found in WAC Chapter 173-460. The program requires that an NOC application demonstrate, using the procedures established by the program, that the increase in TAP emissions from a project would be sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects. Like the federal list of toxic air contaminants referred to as HAPs, WDOE maintains a list of carcinogens and noncarcinogens referred to as TAPs in WAC 173-460-150. The Washington TAP program and associated TAP list was last

updated in November 2019. The procedures for a new source of TAP emissions to comply with the program are:

1. Apply BACT for toxic air pollutants associated with a project (tBACT), then quantify the level of emissions of each TAP.
2. In an NOC application, address each TAP emissions quantification greater than its *de minimis* level per specified averaging period in the TAP list in WAC 173-460-150.
3. Conduct a first-tier review<sup>2</sup> by investigating whether the TAP addressed in an NOC application has an emissions impact less than its corresponding Acceptable Source Impact Level (ASIL) from the TAP list in WAC 173-460-150. If the estimated impacts are less than the ASIL, then health risks are considered insignificant and a permit may be issued.
  - a. The initial screening method for a first-tier review is to compare estimated TAP emissions rates to their Small Quantity Emission Rate (SQER) values found in the TAP list in WAC 173-460-150. If a TAP emissions rate is less than its SQER, its impact is considered to be less than its ASIL and the requirements of the Washington TAP program have been satisfied for NOC approval.
  - b. If a TAP emissions level is not less than its SQER, then dispersion modeling may be conducted to determine a maximum ambient concentration for that TAP. If the modeled TAP concentration is less than its ASIL, then health risks are considered insignificant and the requirements of the Washington TAP program have been satisfied for NOC approval.
4. If TAP emissions levels cannot be shown to be insignificant via the first-tier review, then conduct a second-tier review. A second-tier review<sup>3</sup> requires that the applicant submit a petition to WDOE to conduct the second-tier review. WDOE will make an approval recommendation to the permitting agency after reviewing the petition.
5. If a second-tier review cannot demonstrate that cancer and health risks are within allowable limits, then conduct a third-tier review. A third-tier review<sup>4</sup> is a risk management analysis conducted by WDOE to determine whether the risk of the project is acceptable based on available preventive measures and estimated environmental benefits to the state of Washington. WDOE will make an approval recommendation based upon the risk management analysis.

The TAP emissions from the proposed PNWRE facility satisfy the criteria of the Washington TAP program for NOC approval based upon a first-tier review. **Table 2** summarizes the results of the first-tier review, demonstrating that each TAP emitted in quantities greater than *de minimis* levels either would be emitted at a rate less than its SQER or has a modeled concentration measuring less than its ASIL. Detailed TAP emissions calculations are included in Appendix C. A discussion of the air dispersion modeling methodology is found in Section 6.

---

<sup>2</sup> WAC 173-460-080 (<https://app.leg.wa.gov/WAC/default.aspx?cite=173-460-080>) codifies the first-tier review procedure.

<sup>3</sup> WAC 173-460-090 (<https://app.leg.wa.gov/WAC/default.aspx?cite=173-460-090>) codifies the second-tier review procedure.

<sup>4</sup> WAC 173-460-100 (<https://app.leg.wa.gov/WAC/default.aspx?cite=173-460-100>) codifies the third-tier review procedure.

**TABLE 2**  
**RESULTS OF FIRST-TIER REVIEW FOR TOXIC AIR POLLUTANT EMISSIONS**

| CAS Registry Number | TAP Name                       | Averaging Period | Emission Rate (lb/averaging period) | SQER <sup>1</sup> (lb/averaging period) | Modeling Required? (Yes/No) | ASIL <sup>1</sup> (mg/m <sup>3</sup> ) | Modeling Result (mg/m <sup>3</sup> ) |
|---------------------|--------------------------------|------------------|-------------------------------------|-----------------------------------------|-----------------------------|----------------------------------------|--------------------------------------|
| 57-97-6             | 7,12-Dimethylbenz(a)anthracene | year             | 1.72E-03                            | 1.40E-03                                | Yes                         | 8.50E-06                               | 1.42E-08                             |
| 75-07-0             | Acetaldehyde                   | year             | 3.29E+02                            | 6.00E+01                                | Yes                         | 3.70E-01                               | 8.58E-03                             |
| 107-02-8            | Acrolein                       | 24-hr            | 1.39E+00                            | 2.60E-02                                | Yes                         | 3.50E-01                               | 4.09E-02                             |
| 56-55-3             | Benz(a)anthracene              | year             | 8.42E-02                            | 8.90E-01                                | No                          | N/A                                    | N/A                                  |
| 71-43-2             | Benzene                        | year             | 6.90E+01                            | 2.10E+01                                | Yes                         | 1.30E-01                               | 1.03E-02                             |
| 50-32-8             | Benzo(a)pyrene                 | year             | 9.53E-03                            | 1.60E-01                                | No                          | N/A                                    | N/A                                  |
| 117-81-7            | Bis-(2-ethylhexyl phthalate)   | year             | 7.16E+00                            | 6.80E+01                                | No                          | N/A                                    | N/A                                  |
| 53-70-3             | Dibenzo(a,h)anthracene         | year             | 2.93E-02                            | 8.20E-02                                | No                          | N/A                                    | N/A                                  |
| 50-00-0             | Formaldehyde                   | year             | 6.27E+02                            | 2.70E+01                                | Yes                         | 1.70E-01                               | 1.33E-02                             |
| 1330-20-7           | m,p-Xylene                     | 24-hr            | 3.45E+00                            | 1.60E+01                                | No                          | N/A                                    | N/A                                  |
| 91-20-3             | Naphthalene                    | year             | 4.69E+00                            | 4.80E+00                                | No                          | N/A                                    | N/A                                  |
| 123-38-6            | Propionaldehyde                | 24-hr            | 1.96E-01                            | 5.90E-01                                | No                          | N/A                                    | N/A                                  |
| 7440-38-2           | Arsenic                        | year             | 1.61E+00                            | 4.90E-02                                | Yes                         | 3.00E-04                               | 6.21E-06                             |
| 7440-41-7           | Beryllium                      | year             | 8.07E-02                            | 6.80E-02                                | Yes                         | 4.20E-04                               | 3.12E-07                             |
| 7440-43-9           | Cadmium                        | year             | 4.14E-01                            | 3.90E-02                                | Yes                         | 2.40E-04                               | 1.89E-06                             |
| CRVICOMP            | Chromium, hexavalent           | year             | 2.53E-01                            | 6.50E-04                                | Yes                         | 4.00E-06                               | 9.68E-07                             |
| 7440-47-3           | Chromium, total                | 24-hr            | 4.56E-03                            | 7.40E-03                                | No                          | N/A                                    | N/A                                  |
| 7440-48-4           | Cobalt                         | 24-hr            | 1.31E-03                            | 7.40E-03                                | No                          | N/A                                    | N/A                                  |
| 7439-96-5           | Manganese                      | 24-hr            | 3.17E-01                            | 2.20E-02                                | Yes                         | 3.00E-01                               | 1.14E-02                             |
| 7439-97-6           | Mercury                        | 24-hr            | 1.39E-02                            | 2.20E-03                                | Yes                         | 3.00E-02                               | 5.03E-04                             |
| 7440-02-0           | Nickel                         | year             | 2.61E+00                            | 6.20E-01                                | Yes                         | 3.80E-03                               | 1.05E-05                             |
| 7440-62-2           | Vanadium                       | 24-hr            | 8.70E-04                            | 7.40E-03                                | No                          | N/A                                    | N/A                                  |

NOTES: CAS = Chemical Abstract Service; µg/m<sup>3</sup> = micrograms per cubic meter; ASIL = Acceptable Source Impact Level; hr = hour; lb = pounds; N/A = not applicable; SQER = Small Quantity Emission Rate; TAP = toxic air pollutant

<sup>1</sup> SQER and ASIL values are from Washington Administrative Code 173-460-150.

## 5 Best Available Control Technology

ORCAA Rule 6.1.4 states that any new stationary source of emissions must employ Best Available Control Technology (BACT) for all air pollutants. A paraphrasing of the regulatory language defining BACT in Rule 1.4 is that it is an emission limitation based on the maximum degree of reduction for each air pollutant subject to regulation under the Washington Clean Air Act emitted from any new stationary source which the permitting agency, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such stationary source. Sources must also employ BACT for toxic air pollutants (tBACT) as part of the Washington TAP program. This section includes a BACT analysis,

addressing tBACT where appropriate, from the following sources of emissions at the PNWRE wood pellet facility:

- Raw material receiving
- Chips cleaning line
- Wet hammer mills
- Drying line
- Dry hammer mills and pellet line
- Intermediate and final product storage silos
- Product loadout
- Vehicle traffic
- Emergency generator

## 5.1 BACT Methodology

Presented below are the five basic steps of a top-down BACT review:

### 5.1.1 Step 1 – Identify All Control Technologies

Available control technologies are identified for each emission unit in question. The following methods are used to identify potential technologies: (1) Researching the Reasonably Available Control Technology (RACT)/Best Available Control Technology (BACT)/Lowest Achievable Emission Reduction (LAER) Clearinghouse (RBLC) database, (2) survey regulatory agencies, and (3) draw from previous engineering experience.

### 5.1.2 Step 2 – Eliminate Technically Infeasible Options

After the identification of control options, an analysis is conducted to eliminate technically infeasible options. A control option is eliminated from consideration if there are process-specific conditions that prohibit the implementation of the control.

### 5.1.3 Step 3 – Rank Remaining Control Technologies by Control Effectiveness

Once technically infeasible options are removed from consideration, the remaining options are ranked based on their control effectiveness. If there is only one remaining option, or if all remaining technologies could achieve equivalent control efficiencies, ranking based on control efficiency is not required.

### 5.1.4 Step 4 – Evaluate the Most Effective Controls and Document Results

The BACT process is intended to require sources to implement the most efficient air pollution control strategies that are feasible. When a source selects a control strategy that does not represent the most efficient option in the ranking, a detailed economic, energy, and environmental impact evaluation must be performed that justifies the selection. If a control option is determined



to be economically feasible without adverse energy or environmental impacts, it is not necessary to evaluate the remaining options with lower control efficiencies.

The economic evaluation centers on the cost effectiveness of the control option. Costs of installing and operating control technologies are estimated and annualized following the methodologies outlined in EPA's Control Cost Manual and other industry resources. Cost effectiveness is expressed in dollars per ton of pollutant controlled. Objective analyses of energy and environmental impacts associated with each option are also conducted.

If the most effective control device is selected, a detailed cost analysis is not required.

### **5.1.5 Step 5 – Select BACT**

In the final step, one pollutant-specific control option is selected that satisfies BACT for each emission unit under review based on evaluations from the previous step. A BACT emissions limit is proposed when appropriate that reflects the control option selected by the analysis. Vendor-provided information can be found in **Appendix D**.

## **5.2 BACT Analysis for Raw-Material Receiving**

Woody biomass would be delivered to the PNWRE facility via trucks that would be emptied via truck dumpers and formed into outdoor storage piles with front-end loaders. There would be three truck dumpers and associated storage piles: one for forest residues (chips), one for sawmill residues (white wood), and one for biomass used as fuel (bark). Filterable PM would be emitted as the material slides from the open truck trailer and lands on the ground, as the front-end loaders drop the material onto piles, and again as the front-end loaders empty the material into dedicated walking-floor bins. Filterable PM would also be emitted from wind erosion of the outdoor storage piles. These emissions sources are considered fugitive emissions sources because they would occur outdoors and could not be reasonably passed through a stack, chimney, or vent. After the deposit of raw materials into the walking-floor bins, all raw-material handling processes would be fully enclosed and/or within buildings. Raw material is considered “wet” because of its moisture content, estimated between 18 percent and 55 percent depending on the wood species.

### **5.2.1 PM BACT for Raw-Material Receiving**

#### **5.2.1.1 Steps 1–4 – Identify and Evaluate Control Technologies for Raw-Materials Receiving**

Fugitive PM emissions from raw-material handling are analogous to fugitive dust emissions. Because these emissions cannot reasonably be passed through a stack, chimney, or vent, add-on pollution control technologies designed for these types of emissions points are not technically feasible. The primary pollution control strategy accepted as BACT for fugitive dust emissions is the use of wet suppression techniques to increase the moisture content of the material. Increased moisture content results in heavier material particles, which makes it more difficult for them to become airborne. Given that the wood materials would already have a high moisture content upon delivery to the PNWRE facility, the raw material would achieve the benefits of wet suppression techniques without additional application of water.

### 5.2.1.2 Step 5 – Select BACT for Raw-Materials Receiving

The wood materials would achieve the benefits of wet suppression techniques because they would already have a high moisture content upon delivery to the PNWRE facility. Therefore, no additional control technology is proposed as BACT for the truck dumpers or material storage piles.

## 5.3 BACT Analysis for Chips Cleaning Line and Wet Hammer Mills

Both the chips cleaning line and the wet hammer mills would involve mechanical handling of the raw “wet” materials, either to clean and organize by size in the case of the chips cleaning line, or to reduce the size of the chips in the case of the wet hammer mills. In both of these activities, filterable PM emissions would be generated from the handling of the raw materials.

### 5.3.1 PM BACT for Chips Cleaning Line and Wet Hammer Mills

#### 5.3.1.1 Step 1 – Identify Control Technologies for Chips Cleaning Line and Wet Hammer Mills

The following PM control technologies for the chips cleaning line and wet hammer mills have been identified:

- Baghouse
- Cyclone

#### Baghouse<sup>5</sup>

In a fabric filter baghouse, a particle-laden exhaust stream is passed through a tightly woven or felted fabric, causing the PM in the exhaust stream to be collected on the fabric by sieving and other mechanisms. Fabric filters may be in the form of sheets, cartridges, or bags, with a number of the individual fabric filter units housed together in a group. Bags are the most common type of filter. The dust cake that forms on the filter from the collected PM can significantly increase collection efficiency. Fabric filters are frequently referred to as “baghouses” because the fabric is usually configured in cylindrical bags. Typical design efficiencies are between 99 and 99.9 percent.

#### Cyclone<sup>6</sup>

A cyclone removes particulate from a gas stream by centrifugal and inertial forces, induced by forcing particulate-laden gas to change direction. Typically, cyclones are effective for particulate greater than 10 microns in diameter; however, there are high-efficiency cyclones designed to be effective for particulate matter less than or equal to 10 microns and 2.5 microns in diameter (PM<sub>10</sub> and PM<sub>2.5</sub>, respectively). Cyclones operate by creating a double vortex inside the cyclone body, usually a cone-shaped chamber. The incoming gas is forced into circular motion down the

<sup>5</sup> U.S. Environmental Protection Agency. 2003. Air Pollution Control Technology Fact Sheet: Fabric Filter – Pulse-Jet Cleaned Type (also referred to as Baghouses). EPA-452/F-03-025. Available: <https://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=P100RQ6L.txt>. Accessed June 15, 2023.

<sup>6</sup> U.S. Environmental Protection Agency. 2003. Air Pollution Control Technology Fact Sheet: Cyclones. EPA-452/F-03-005. Available: <https://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=P100C75Q.txt>. Accessed June 15, 2023.

cyclone near the inner surface of the cyclone tube. At the bottom of the cyclone, the gas turns and spirals up through the center of the tube and out of the top of the cyclone. Control efficiencies for a single conventional cyclone are 70–90 percent for PM, 30–90 percent for PM<sub>10</sub>, and 0–40 percent for PM<sub>2.5</sub>. High-efficiency single cyclones are designed to achieve higher control of smaller particles and have control efficiencies of 80–99 percent for PM, 60–95 percent for PM<sub>10</sub>, and 20–70 percent for PM<sub>2.5</sub>.

### **5.3.1.2 Step 2 – Eliminate Technically Infeasible Options for Chips Cleaning Line and Wet Hammer Mills**

The material processed in the chips cleaning line and wet hammer mills is high in moisture content. Baghouses are not suitable for high-moisture-content exhaust streams because of the crusty caking or plugging of the fabric filters that would occur.<sup>7</sup> This plugging leads to blinding, a phenomenon that prevents airflow through the cake buildup and reduces efficiency. Therefore, a baghouse is not technically feasible for the chips cleaning line and wet hammer mills and has been removed from further consideration.

### **5.3.1.3 Step 3 – Rank Remaining Control Options by Effectiveness for Chips Cleaning Line and Wet Hammer Mills**

The only remaining feasible control technology is cyclones.

### **5.3.1.4 Step 4 – Evaluate the Most Effective Controls and Document Results for Chips Cleaning Line and Wet Hammer Mills**

The only remaining feasible control technology is cyclones.

### **5.3.1.5 Step 5 – Select BACT for Chips Cleaning Line and Wet Hammer Mills**

PNWRE proposes the use of cyclones for controlling PM from the chips cleaning line and wet hammer mills. Cyclones provide the added benefit of allowing for reclamation of airborne product. PNWRE would route product reclaimed by the cyclones to the drying line. PM emissions from the chips cleaning line cyclone would not exceed 6.81 lb/hr and PM emissions from each wet hammer mill cyclone would not exceed 1.91 lb/hr.

## **5.4 BACT/tBACT Analysis for Drying Line**

The drying line includes the hog fuel furnace and drum dryer. The furnace would combust hog fuel to provide heat for the dryer and would have a maximum heat input capacity of 164.81 MMBtu/hr. Wet raw materials would be staged in a metering bin before being fed to the drum dryer inlet. Hot flue gas from the furnace would be routed through the drum dryer where the heat would dry the raw material from approximately 50 percent moisture content to a target 10 percent final moisture content. Dried material would be conveyed from the drum dryer discharge through a pair of high-efficiency cyclones in parallel that would separate the dried wood material from the moisture-rich exhaust gas stream. The exhaust stream then either would be recycled back through the drum dryer or would pass through the emissions control system before emitting from a stack

<sup>7</sup> U.S. Environmental Protection Agency. 2003. Air Pollution Control Technology Fact Sheet: Fabric Filter – Pulse-Jet Cleaned Type (also referred to as Baghouses). EPA-452/F-03-025. Available: <https://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=P100RQ6L.txt>. Accessed June 15, 2023.

into the atmosphere. The furnace would generate combustion emissions of filterable and condensable PM, nitrogen oxides (NO<sub>x</sub>), CO, VOC, and sulfur dioxide (SO<sub>2</sub>). TAP emissions would also be generated during this process. This BACT analysis would also serve as tBACT for complying with the Washington TAP program.

## **5.4.1 PM BACT for Drying Line**

### **5.4.1.1 Step 1 – Identify Control Technologies for Drying Line**

Filterable PM and condensable PM would be generated from the combustion of wood fuel in the dryer furnace. An RBLC search to identify PM control technologies for the drying line identified the following:

- Baghouse
- Electrostatic precipitator
- Wet electrostatic precipitator

#### **Baghouse**

Refer to the discussion in Section 5.3.1.1 for a description of the theory of operation of a baghouse.

#### **Electrostatic Precipitator<sup>8</sup>**

An ESP is a PM control device that uses electrical forces to move particles entrained within an exhaust stream onto collector surfaces such as pipes or plates. The entrained particles are given an electrical charge when they pass through a corona, a region where the gaseous ions flow. Electrodes in the center of the flow lane are maintained at high voltage and generate the electrical field that forces the particles to the collector surface. In dry ESPs, the collectors are knocked, or “rapped,” by various mechanical means to dislodge the particulate, which slides downward into a hopper where they are collected and disposed of. Typical design efficiencies are between 99 and 99.9 percent.

#### **Wet Electrostatic Precipitator<sup>9</sup>**

A WESP is a PM control device that uses electrical forces to move particles entrained within an exhaust stream onto collector surfaces such as pipes or plates in the same manner as a dry ESP. Where a WESP differs from a dry ESP is that the collectors are either intermittently or continuously washed by a spray of liquid to remove the particulate from the surfaces. Water is usually the liquid used for washing the collection surfaces. A drainage system collects the wet effluent, which is then disposed of. A WESP can be effective in collecting sticky particles and mists, as well as explosive or flammable dusts. The humid atmosphere that results from washing in a WESP cools and conditions the gas stream, causing pollutants to condense. Liquid particles such as condensable PM are collected along with particles and provide another means of rinsing the collection surfaces. Typical design efficiencies are between 99 and 99.9 percent.

---

<sup>8</sup> U.S. Environmental Protection Agency. 2003. Air Pollution Control Technology Fact Sheet: Dry Electrostatic Precipitator (ESP)—Wire-Plate Type. EPA-452/F-03-028. Available: <https://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=P1008OHL.txt>. Accessed June 26, 2023.

<sup>9</sup> U.S. Environmental Protection Agency. 2003. Air Pollution Control Technology Fact Sheet: Wet Electrostatic Precipitator (ESP)—Wire-Plate Type. EPA-452/F-03-030. Available: <https://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=P1008OHV.txt>. Accessed June 15, 2023.

#### **5.4.1.2 Step 2 – Eliminate Technically Infeasible Options for Drying Line**

The drying line uses heat to draw moisture from the product and transfer it to the exhaust stream, resulting in a moisture-laden exhaust stream. Baghouses are not suitable for high-moisture-content exhaust streams because of the crusty caking or plugging of the fabric filters that would occur.<sup>10</sup> This plugging leads to blinding, a phenomenon that prevents airflow through the cake buildup and reduces efficiency. Therefore, a baghouse is technically infeasible for the drying line and has been removed from further consideration.

Dry ESPs are not recommended for removing sticky or moist particles.<sup>11</sup> Therefore, a dry ESP is not technically feasible for the drying line and has been removed from further consideration.

#### **5.4.1.3 Step 3 – Rank Remaining Control Options by Effectiveness for Drying Line**

The only remaining control technology is the WESP.

#### **5.4.1.4 Step 4 – Evaluate the Most Effective Controls and Document Results for Drying Line**

The only remaining control technology is the WESP. In addition to filterable PM effectiveness, a WESP controls TAPs that are in particulate form, such as most metals, as well as aerosolized PM, acid mists, and VOCs.<sup>12</sup>

#### **5.4.1.5 Step 5 – Select BACT for Drying Line**

PNWRE proposes installation and utilization of a WESP with filterable PM not to exceed 7.73 pounds per hour (lb/hr) as BACT for the drying line's filterable particulate emissions. Filterable PM<sub>10</sub> and PM<sub>2.5</sub> are assumed to be equivalent to filterable PM from this source. When accounting for condensable particulate emissions, total PM<sub>10</sub> and PM<sub>2.5</sub> are not to exceed 12.74 lb/hr.

### **5.4.2 NO<sub>x</sub> BACT for Drying Line**

#### **5.4.2.1 Steps 1–4 – Identify and Evaluate Control Technologies for Drying Line**

The drying line's furnace would burn hog fuel (wood bark) as a fuel source. A regenerative thermal oxidizer, or RTO, that would combust natural gas would also be proposed to control other pollutants. NO<sub>x</sub> emissions result primarily from thermal NO<sub>x</sub> formation during combustion. Nitrogen and oxygen in the combustion air combine with one another at the high temperatures in a flame. An RBLC search to identify NO<sub>x</sub> control technologies for hog fuel-fired or wet bark-fired dryers at wood pellet facilities did not yield any results. Therefore, good combustion practices, which is always available, is the only available control technology.

<sup>10</sup> U.S. Environmental Protection Agency. 2003. Air Pollution Control Technology Fact Sheet: Fabric Filter – Pulse-Jet Cleaned Type (also referred to as Baghouses). EPA-452/F-03-025. Available: <https://nepis.epa.gov/Exe/ZyPURL.cgi?Dockkey=P100RQ6L.txt>. Accessed June 15, 2023.

<sup>11</sup> U.S. Environmental Protection Agency. 2003. Air Pollution Control Technology Fact Sheet: Dry Electrostatic Precipitator (ESP)—Wire-Plate Type. EPA-452/F-03-028. Available: <https://nepis.epa.gov/Exe/ZyPURL.cgi?Dockkey=P1008OHL.txt>. Accessed June 26, 2023.

<sup>12</sup> U.S. Environmental Protection Agency. 2003. Air Pollution Control Technology Fact Sheet: Wet Electrostatic Precipitator (ESP)—Wire-Plate Type. EPA-452/F-03-030. Available: <https://nepis.epa.gov/Exe/ZyPURL.cgi?Dockkey=P1008OHV.txt>. Accessed June 15, 2023.

#### **5.4.2.2 Step 5 – Select BACT for Drying Line**

PNWRE proposes good combustion practices—the only available control technology—with NO<sub>x</sub> emissions not to exceed 52 lb/hr as BACT for the drying line's NO<sub>x</sub> emissions.

### **5.4.3 CO and VOC BACT for Drying Line**

#### **5.4.3.1 Steps 1–4 – Identify and Evaluate Control Technologies for Drying Line**

CO and VOC emissions result primarily from the incomplete combustion of fuels. Wood combustion also releases VOC from compounds evaporated from the wood. Because of their similar formation mechanisms and control strategies, CO and VOC are analyzed together during BACT. An RBLC search to identify CO and VOC control technologies identified the following:

- Good combustion practices
- Regenerative thermal oxidizer

#### **Regenerative Thermal Oxidizer<sup>13, 14</sup>**

An RTO is a type of thermal incinerator or oxidizer that destroys VOC and condensable organics by burning them at high temperatures. Thermal oxidizers also reduce CO emissions in direct-fired dryer exhausts by oxidizing the CO in the exhaust to carbon dioxide. RTOs are designed to preheat the inlet emission stream with heat recovered from the incineration exhaust gases. A gas burner brings the preheated emissions up to an incineration temperature between 788 degrees Celsius (°C) and 871°C (1,450°F and 1,600°F) in a combustion chamber with sufficient gas residence time to complete the combustion. Combustion gases then pass through a cooled ceramic bed where heat is extracted. By reversing the flow through the beds, the heat transferred from the combustion exhaust air preheats the gases to be treated, thereby reducing auxiliary fuel requirements.

PNWRE considers this technology to be available for the dryer.

#### **5.4.3.2 Step 5 – Select BACT for Drying Line**

Good combustion practices and RTO are proposed as BACT for the drying line's VOC and CO emissions, with VOC emissions not to exceed 6.58 lb/hr and CO emissions not to exceed 42 lb/hr. The RTO would be rated to achieve at least 95 percent destruction efficiency of VOC.

### **5.4.4 SO<sub>2</sub> BACT for Drying Line**

#### **5.4.4.1 Steps 1–4 – Identify and Evaluate Control Technologies for Drying Line**

SO<sub>2</sub> emissions result primarily from a mass balance conversion of sulfur present in the combustion fuels. Wood does not typically have a notable sulfur content and therefore does not emit SO<sub>2</sub> in large quantities. An RBLC search to identify SO<sub>2</sub> controls applied to hog fuel or wet bark combustion did not yield any results. Accordingly, good combustion practices, which are always available, are proposed to satisfy BACT for SO<sub>2</sub>.

<sup>13</sup> U.S. Environmental Protection Agency. 2003. Air Pollution Control Technology Fact Sheet: Regenerative Incinerator. EPA-452/F-03-021. Available: <https://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=P1008OH5.txt>. Accessed June 19, 2023.

<sup>14</sup> U.S. Environmental Protection Agency. 2002. AP-42, Section 10.6.2, Particleboard Manufacturing. Available: <https://www.epa.gov/sites/default/files/2020-10/documents/c10s06-2.pdf>. Accessed June 19, 2023.

#### **5.4.4.2 Step 5 – Select BACT for Drying Line**

Good combustion practices are proposed as BACT for the drying line's SO<sub>2</sub> emissions.

#### **5.4.5 tBACT for Drying Line**

tBACT, which is BACT as applied to TAP emissions, is required by the Washington TAP program. TAP emissions from the drying line would be in the form of VOC emissions, or PM emissions in the case of most metals. Therefore, the BACT strategies employed for control of PM and VOC emissions from the drying line (WESP and RTO) would satisfy tBACT as well.

### **5.5 BACT/tBACT Analysis for Combined Exhaust from the Dry Hammer Mills and Pellet Line**

PNWRE intends to route emissions from the dry hammer mills and the pellet line to a common stack prior to release to the atmosphere. Therefore, the BACT analysis addresses both of these processes together. The dry hammer mills would reduce the size of the dried material for optimal pellet formation. The dried material would be pressed and cut into pellets of desired dimensions in the pellet line, experiencing a reduction in dusting characteristics after having been formed into pellets. PM and VOC emissions would be generated from these processes. The TAP emissions would be in the form of VOC emissions; therefore, tBACT would equate to the BACT employed for VOC control.

#### **5.5.1 PM BACT for Dry Hammer Mills and Pellet Line**

##### **5.5.1.1 Step 1 – Identify Control Technologies for Dry Hammer Mills and Pellet Line**

The following PM control technologies would be analyzed:

- Fabric filters/baghouse
- Cyclone

##### **5.5.1.2 Step 2 – Eliminate Technically Infeasible Options for Dry Hammer Mills and Pellet Line**

These technologies are feasible.

##### **5.5.1.3 Step 3 – Rank Remaining Control Options by Effectiveness for Dry Hammer Mills and Pellet Line**

1. Fabric filters/baghouse
2. Cyclones

##### **5.5.1.4 Step 4 – Evaluate the Most Effective Controls and Document Results for Dry Hammer Mills and Pellet Line**

PNWRE proposes to use “cyclofilters,” which are a combination of cyclones and fabric filters, for controlling the PM from the dry hammer mills. The cyclone portion of the cyclofilter would allow for product recovery while the fabric filtration would offer the best-performing PM control. Each of the four dry hammer mills would emit exhaust through a dedicated cyclofilter before the exhaust

combines with the exhaust from the pellet coolers. Each of the two pellet coolers would emit exhaust to a baghouse before the exhaust combines with the exhaust from the dry hammer mills.

#### **5.5.1.5 Step 5 – Select BACT for Dry Hammer Mills and Pellet Line**

PNWRE proposes the combined use of cyclofilters and baghouses for controlling PM from the dry hammer mills and pellet line. The cyclofilters would allow for airborne product reclamation and the integrated fabric filter system would offer the best-performing PM control. The combined emission streams would have a filterable PM emission rate not to exceed 1.87 lb/hr. Filterable PM<sub>10</sub> and PM<sub>2.5</sub> are assumed to be equivalent to filterable PM from this source. The combined exhaust streams would have controlled the PM sufficiently to prevent blinding of catalyst used in the downstream RCO for VOC control before release to the atmosphere. When considering the condensable PM formed during combustion in the RCO, the total PM<sub>10</sub> and PM<sub>2.5</sub> emissions would not exceed 1.89 lb/hr.

### **5.5.2 VOC BACT/tBACT for Dry Hammer Mill and Pellet Line**

#### **5.5.2.1 Step 1 – Identify Control Technologies for Dry Hammer Mill and Pellet Line**

The following VOC/TAP control technologies would be analyzed:

- Regenerative Thermal Oxidizer
- Regenerative Catalytic Oxidizer

Refer to the discussion in Section 5.4.3.1 for a description of the theory of operation of an RTO.

An RCO is a regenerative incinerator that operates under principles similar to those of an RTO, where VOC is destroyed via oxidation. An RCO uses a catalyst material rather than ceramic material in the packed bed. This allows for destruction of VOC at a lower oxidation temperature.<sup>15</sup> An RCO has a destruction efficiency similar to that of an RTO, but with lower fuel requirements because of the lower temperatures.

#### **5.5.2.2 Step 2 – Eliminate Technically Infeasible Options for Dry Hammer Mill and Pellet Line**

These technologies are feasible for this source of emissions.

#### **5.5.2.3 Step 3 – Rank Remaining Control Options by Effectiveness for Dry Hammer Mill and Pellet Line**

Both RTO and RCO achieve the same levels of VOC/TAP control.

---

<sup>15</sup> U.S. Environmental Protection Agency. 2003. Air Pollution Control Technology Fact Sheet: Regenerative Incinerator. EPA-452/F-03-021. Available: <https://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=P1008OH5.txt>. Accessed June 19, 2023.



#### **5.5.3.4 Step 4 – Evaluate the Most Effective Controls and Document Results for Dry Hammer Mill and Pellet Line**

PNWRE proposes to use an RCO for control of the VOC/TAP from this source of emissions. No further evaluation is necessary because PNWRE has proposed the best-performing technology.

#### **5.5.3.5 Step 5 – Select BACT/tBACT for Dry Hammer Mill and Pellet Line**

PNWRE proposes an RCO for controlling VOC/TAP from the combined exhaust stream for the dry hammer mill and pellet line. The RCO would be rated to achieve at least 95 percent destruction efficiency of the VOC/TAP emissions with a VOC emission rate not to exceed 8.6 lb/hr.

### **5.6 BACT Analysis for Intermediate and Final Product Storage Silos and Truck Loadout**

The dry-product intermediate-storage silo (two vents, EP-06 and EP-06) is a vessel that would be used for staging material after it exits the drying line and before it is processed in the dry hammer mills. Milled dry-product intermediate-storage silo EP-09 is a vessel that would be used for staging material after it exits the dry hammer mills and before it is processed in the pellet line. The estimated maximum potential PM emissions of these enclosed silo vents would not exceed 0.07 TPY each and vent filters are included in the design, so additional control devices are not necessary.

Five pellet storage silos, EP-10 through EP-14, would provide staging for final product before loadout. The silos would utilize aeration fans and venting via mechanical extractor to maintain low pellet temperature for final shipment. Pellets have reduced dusting characteristics because of their inherent moisture content and high density. Each silo would maintain a maximum PM PTE of no more than 3.85 TPY, so additional control devices are not necessary.

Transferring to Willis Enterprises' existing conveyance and vessel loadout equipment would be the primary means of product export; however, the facility would include truck loadout capability onsite (EP-15) that could be used in special circumstances. Because this source would be used only in special circumstances, PNWRE proposes no more than 10 loaded trucks per day and 32,000 tons per year of truck loadout utilization. Fugitive PM emissions would be generated from the deposit of pellets into trucks; however, maximum potential PM emissions would be less than 0.02 TPY, so additional control devices are not necessary.

PNWRE proposes proper maintenance and good operating practices as BACT for PM emissions from the product storage silos and truck loadout.

### **5.7 BACT Analysis for Vehicle Traffic**

Raw materials would be provided to PNWRE via heavy-duty trucks and front-end loaders would move the unloaded raw materials as needed. In special circumstances, pellets could be exported from the facility via heavy-duty trucks. This vehicle traffic on the facility's unpaved roads would be a source of PM emissions.

## 5.7.1 PM BACT for Vehicle Traffic

### 5.7.1.1 Steps 1–4 – Identify and Evaluate Control Technologies for Vehicle Traffic

The following PM control technology is generally applied to unpaved roads and is considered feasible:

- Reasonable precautions, including regular application of water or other dust suppressants.

The PNWRE facility would implement a dust control plan, which would include abiding by a 10-mph posted speed limit for all vehicles and heavy equipment, regularly applying water on road surfaces via water truck, and using a pickup broom truck as needed. The Western Region Air Partnership Fugitive Dust Handbook<sup>16</sup> provides control efficiencies for various control strategies on unpaved roads, offering 44 percent control for limiting speeds to 25 mph and up to 74 percent from applying water. The PNWRE dust control plan would require even lower speeds, daily monitoring of road surfaces that would include watering, and use of a pickup broom truck as needed. Therefore, an 85 percent control efficiency has been identified and applied to unpaved haul road traffic based on the combined application of these measures.

### 5.7.1.2 Step 5 – Select BACT for Vehicle Traffic

PNWRE proposes to mitigate PM emissions from vehicle traffic by employing reasonable precautions and adherence to a dust control plan as BACT. This is consistent with ORCAA Regulation 8.3(c), which requires that reasonable and/or appropriate precautions be taken to prevent fugitive particulate material from becoming airborne.

## 5.8 BACT/tBACT Analysis for Emergency Generator

A 300-kilowatt backup emergency generator would be installed at the PNWRE facility. The diesel-fired engine for this generator would be certified to meet the emissions standards of 40 CFR 60, Subpart IIII and would be fired with ultra-low-sulfur diesel only. Other than emergency use, backup emergency engines are limited by 40 CFR 60, Subpart IIII to no more than 100 hours per year of operation for maintenance checks and readiness testing.

Add-on controls for emergency backup diesel-fired generators are impractical because of the intermittent and infrequent operation of these units. Therefore, PNWRE proposes that BACT/tBACT for all pollutants be good combustion practices and following manufacturer's instructions for maintenance. In addition, PNWRE would comply with the applicable conditions for emergency engines from 40 CFR 60, Subpart IIII.

PNWRE has not selected a specific generator yet; however, the selected unit would not exceed 300 kilowatts in capacity. A conservative estimate of sufficient engine size (500 horsepower) and EPA Tier 3 nonroad emissions standards have been used to account for engine emissions from maintenance checks and readiness testing.

<sup>16</sup> Western Governors' Association. 2006. *WRAP Fugitive Dust Handbook*. Denver, CO. Prepared by Countess Environmental, Westlake Village, CA. September 7, 2006. Available: [https://www.wrapair.org/forums/dej/f/fdh/content/FDHandbook\\_Rev\\_06.pdf](https://www.wrapair.org/forums/dej/f/fdh/content/FDHandbook_Rev_06.pdf). Accessed July 5, 2023.

## 6 Air Dispersion Modeling Methodology

This section of the application report presents the procedures used to perform the air dispersion modeling analysis.

### 6.1 Model Selection

Version 22112 of the AERMOD model was used to estimate maximum ground-level concentrations in the air dispersion analysis. AERMOD is a refined, steady-state, multi-source air dispersion model used for industrial sources.

### 6.2 Meteorological Data

The modeling analysis was performed using five years of representative meteorological data prepared for input with AERMOD version 22112. The AERMOD meteorological data were derived using several data sets, including surface station data collected at the Bowerman Airport, WA, station (WBAN Station No. 94225) for calendar years 2018–2022. Upper air sounding data are taken from the Quillayute Airport, WA station (WBAN Station No. 72797). The meteorological data were processed with AERMET v22112, along with the ADJU\* option to account for deficiencies in AERMOD under low wind speed conditions. Wind roses are found in **Appendix E**.

The AERMINUTE pre-processor (version 15272), a tool for assessing 1-minute ASOS data, was used to process 1-minute wind speed and direction data from Bowerman Airport. AERMINUTE produces hourly average winds from the 1-minute data that are used as inputs to AERMET's second stage.

In addition to the meteorological data, processing of land use data to derive albedo, Bowen ratio, and surface roughness was conducted using the AERSURFACE preprocessor (version 20060) in a manner consistent with EPA guidance. The resulting parameters are used by AERMOD to estimate surface energy fluxes and construct boundary layer profiles. EPA guidance indicates that AERSURFACE should be used to process land use arcs out to one kilometer from the project site and using arcs equal or greater than 30 degrees for assessing surface roughness. The most recent version of the AERSURFACE also allows for the incorporation of imperviousness data and canopy data that helps inform the surface roughness calculations. Bowen ratio and albedo are assessed by calculating their geometric means associated with common land use types across a 10 kilometer by 10 kilometer region.

For the project site, AERSURFACE processed National Land Cover (2016 NLCD) data acquired from the EPA.<sup>17</sup> These data were used as inputs to the AERSURFACE tool along with information on the meteorological surface data site, including that the site is not expected to have continuous snow cover in winter, that the site is not in an arid region, and that the site is an airport. The tool was also supplied with the canopy and imperviousness data from the NLCD data set.

---

<sup>17</sup> National Land Cover Data, as published by the EPA, <ftp://newftp.epa.gov/aqmg/nlcd/>

The results from AERSURFACE provided an albedo of 0.13 that did not vary by season. The Bowen ratio was calculated as 0.28, 0.24, 0.21, and 0.28 for winter, spring, summer, and autumn respectively. The surface roughness estimated by AERSURFACE is provided in **Table 3**.

**TABLE 3**  
**BOWERMAN AIRPORT SURFACE ROUGHNESS**

| Sector | Winter | Spring | Summer | Autumn |
|--------|--------|--------|--------|--------|
| 1      | 0.165  | 0.170  | 0.174  | 0.172  |
| 2      | 0.075  | 0.082  | 0.096  | 0.094  |
| 3      | 0.013  | 0.017  | 0.019  | 0.017  |
| 4      | 0.006  | 0.007  | 0.008  | 0.007  |
| 5      | 0.002  | 0.002  | 0.003  | 0.002  |
| 6      | 0.002  | 0.003  | 0.003  | 0.003  |
| 7      | 0.002  | 0.002  | 0.002  | 0.002  |
| 8      | 0.004  | 0.005  | 0.005  | 0.005  |
| 9      | 0.021  | 0.027  | 0.033  | 0.027  |
| 10     | 0.054  | 0.058  | 0.061  | 0.058  |
| 11     | 0.068  | 0.070  | 0.072  | 0.070  |
| 12     | 0.106  | 0.110  | 0.113  | 0.110  |

## 6.3 Coordinate System

The locations of emission sources, structures, and receptors are represented in the Universal Transverse Mercator (UTM) coordinate system using the North American Datum of 1983, Continental U.S. projection. The UTM grid divides the world into coordinates that are measured in north meters (measured from the equator) and east meters (measured from the central meridian of a particular zone, which is set at 500 kilometers). UTM coordinates for this analysis are based on UTM Zone 10. The location of the PNWRE facility is approximately 5,203,070 Northing and 430,485 Easting in UTM Zone 10.

## 6.4 Terrain Elevations

Terrain elevations for receptors, buildings, and sources were determined using the National Elevation Dataset (NED) supplied by the U.S. Geological Survey. The NED is a seamless data set with the best available raster elevation data of the contiguous United States. NED data retrieved for this model have a grid spacing of 1/3 arc-second or 10 meters. The AERMOD preprocessor, AERMAP version 18081, was used to compute model object elevations from the NED grid spacing. AERMAP also calculates hill height data for all receptors.

## 6.5 Urban/Rural Determination

The proposed PNWRE facility is located in the city of Hoquiam on the west coast of Washington. According to 2020 census data, Hoquiam has a population of 8,774.<sup>18</sup> Outside of the city, most of the land use is not considered urban (medium- to high-intensity developed land). For the purposes of this model, it is conservatively assumed that the area surrounding the facility does not meet the definition of urban land use. Therefore, the urban option was not selected in AERMOD.

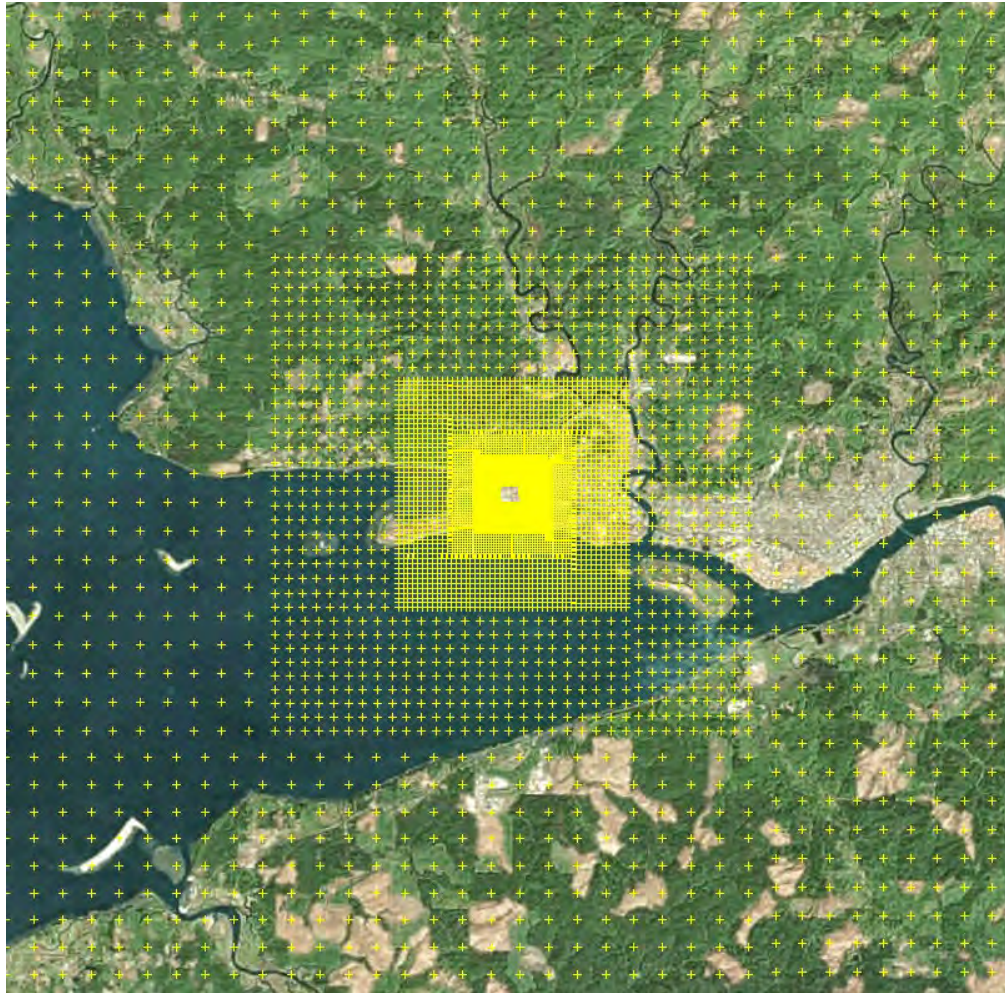
## 6.6 Receptor Grids

The model has receptors along the fence line spaced 12.5 meters apart. There is also a variable-density, circular Cartesian receptor grid extending 10,000 meters from the center of the PNWRE facility site. This receptor grid spacing was set up according to the following list:

- 25-meter spacing for the first 400 meters from the center of the facility site.
- 50-meter spacing from 400 to 900 meters from the center of the facility site.
- 100-meter spacing from 900 to 2,000 meters from the center of the facility site.
- 300-meter spacing from 2,000 to 4,500 meters from the center of the facility site.
- 600-meter spacing from 4,500 to 10,000 meters from the center of the facility site.

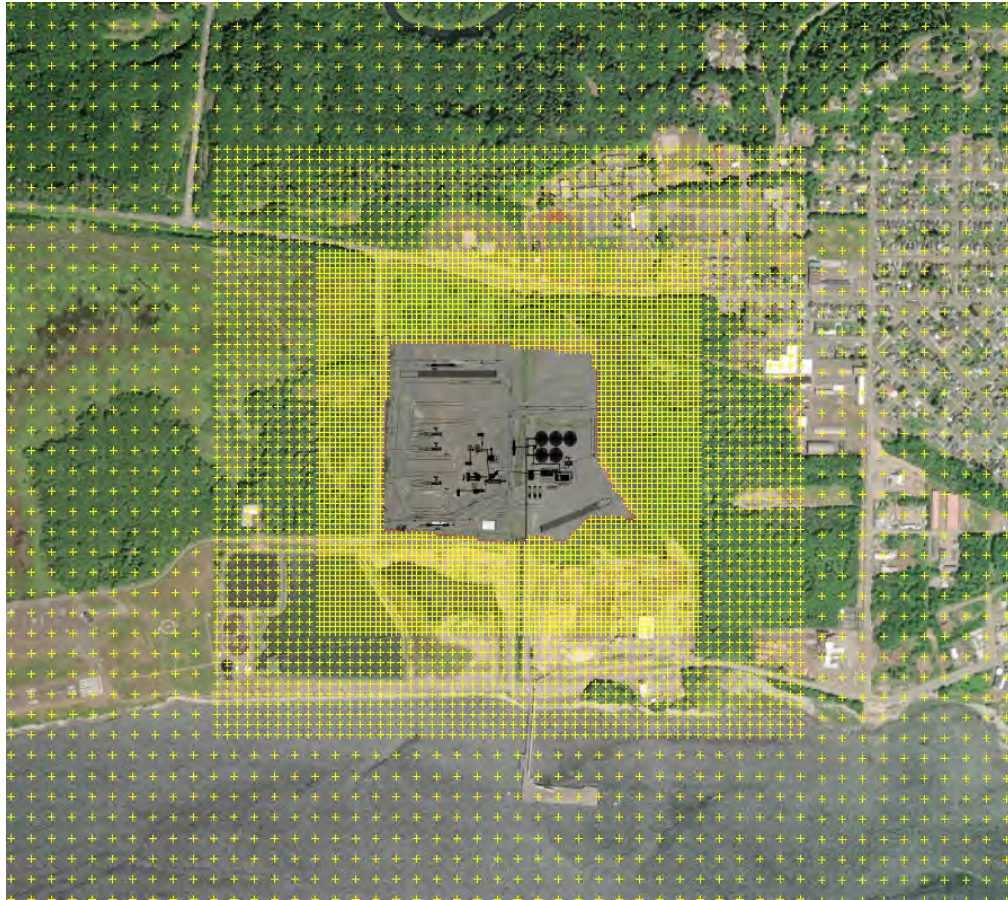
In addition to the receptor grid above, a fine 12.5-meter spaced grid was used for the first 150 meters extending outward from the proposed facility's fence line. **Figure 3** and **Figure 4** show maps of the receptors. **Figure 5** shows the proposed facility with the fence line represented by the red outline surrounding the facility with included buildings.

<sup>18</sup> U.S. Census Bureau, Population Division. 2023. Annual Estimates of the Resident Population for Incorporated Places in Washington: April 1, 2020 to July 1, 2022 (SUB-IP-EST2022-POP-53). May 2023. Available: <https://www2.census.gov/programs-surveys/popest/tables/2020-2022/cities/totals/SUB-IP-EST2022-POP-53.xlsx>. Accessed June 30, 2023.



**Figure 3      Zoomed-Out Receptor Grid**





**Figure 4**      **Zoomed-In Receptor Grid**



**Figure 5**      **Facility Fence Line**

## 6.7 Building Downwash

Emissions from a source are evaluated in terms of the source's proximity to nearby structures. The purpose of this evaluation was to determine whether stack discharges might become caught in the turbulent wakes of the structures at the PNWRE facility. Wind blowing around a building creates zones of turbulence greater than those that would exist if the buildings were absent. The concepts and procedures expressed in the Guideline for Determination of Good Engineering Practice Stack Height were applied.<sup>19</sup> All structures that may affect downwash of emissions from the proposed facility were included in the models and are presented in **Table 4**.

**TABLE 4**  
**BUILDING PARAMETERS**

| Building | Shape       | Center<br>(UTM X, UTM Y) | Building Height<br>(m) | Side Length<br>1 (m) | Side Length<br>2 (m) | Diameter<br>(m) |
|----------|-------------|--------------------------|------------------------|----------------------|----------------------|-----------------|
| 01       | Rectangular | (430453, 5203005)        | 27.0                   | 5.5                  | 6.5                  | N/A             |
| 02       | Rectangular | (430468, 5203026)        | 24.0                   | 4.3                  | 9.9                  | N/A             |
| 03       | Rectangular | (430389, 5203010)        | 27.0                   | 2.1                  | 2.5                  | N/A             |
| 04       | Rectangular | (430553, 5203020)        | 10.7                   | 12.7                 | 17.6                 | N/A             |
| 05       | Rectangular | (430591, 5203027)        | 17.0                   | 25.6                 | 6.2                  | N/A             |
| 06       | Rectangular | (430593, 5203016)        | 17.0                   | 33.2                 | 14.5                 | N/A             |
| 07       | Rectangular | (430616, 5203011)        | 15.0                   | 13.3                 | 25.3                 | N/A             |
| 08       | Rectangular | (430636, 5203010)        | 12.0                   | 26.4                 | 25.3                 | N/A             |
| 09       | Rectangular | (430651, 5203026)        | 13.0                   | 1.7                  | 1.2                  | N/A             |
| 10       | Rectangular | (430563, 5203091)        | 34.0                   | 3.0                  | 9.3                  | N/A             |
| 11       | Rectangular | (430513, 5203090)        | 34.0                   | 8.3                  | 5.6                  | N/A             |
| 12       | Rectangular | (430405, 5203088)        | 13.0                   | 12.2                 | 13.9                 | N/A             |
| 13       | Rectangular | (430401, 5203051)        | 6.0                    | 16.4                 | 8.6                  | N/A             |
| 14       | Rectangular | (430431, 5203120)        | 6.0                    | 15.1                 | 9.1                  | N/A             |
| 15       | Rectangular | (430435, 5203099)        | 6.0                    | 4.2                  | 9.6                  | N/A             |
| 16       | Rectangular | (430457, 5203085)        | 10.0                   | 6.2                  | 6.9                  | N/A             |
| 17       | Rectangular | (430458, 5203064)        | 10.0                   | 16.2                 | 12.4                 | N/A             |
| 18       | Rectangular | (430465, 5203006)        | 7.5                    | 30.7                 | 9.6                  | N/A             |
| 19       | Rectangular | (430377, 5202978)        | 6.0                    | 8.3                  | 18.5                 | N/A             |
| 20       | Rectangular | (430401, 5203016)        | 6.0                    | 10.5                 | 22.0                 | N/A             |
| 21       | Rectangular | (430421, 5203017)        | 6.0                    | 16.2                 | 21.5                 | N/A             |
| 22       | Circular    | (430580, 5203112)        | 34.0                   | N/A                  | N/A                  | 33.5            |
| 23       | Circular    | (430613, 5203112)        | 34.0                   | N/A                  | N/A                  | 33.5            |
| 24       | Circular    | (430647, 5203112)        | 34.0                   | N/A                  | N/A                  | 33.5            |
| 25       | Circular    | (430580, 5203071)        | 34.0                   | N/A                  | N/A                  | 33.5            |
| 26       | Circular    | (430613, 5203071)        | 34.0                   | N/A                  | N/A                  | 33.5            |

NOTES: m = meter; UTM = Universal Transverse Mercator; N/A = not applicable

<sup>19</sup> EPA, 1985. Guideline for Determination of Good Engineering Practice Stack Height. Available: <https://www.epa.gov/sites/default/files/2020-09/documents/gep.pdf>.



## 6.8 Source Types and Parameters

Emission releases from the equipment on-site were represented in the model as point sources, horizontal point sources, area sources, and volume sources. Emission unit parameters were based on vendor quotes and emissions estimates using EPA AP-42 and Region 10 Memorandum of emission factors for activities at sawmills in the Pacific Northwest. Area and volume source parameters were based on the dimensions of nearby structures or obstructions according to the User's Guide for the AMS/EPA Regulatory Model (AERMOD). The current facility site layout is provided in Appendix B.

The modeling parameters for the sources are determined based the following and are included in **Table 5** and **Table 6** as well as **Appendix F**:

- Exhaust temperature, exhaust flow rate/velocity, stack height, and stack diameter were obtained from client information. Engineering assumptions applied for modeling the backup emergency generator.
- Dimensions for the following volume source emission units were determined based on dimensions from the facility site plan and Table 3-2 of the AERMOD Users' Guide.
- Dimensions for the following area source emission units were configured according to Section 3.3.2.3 of the AERMOD Users' Guide.
- Haul road volume source parameters were determined using the dimensions of an average semi-truck trailer and the EPA guidance memo on haul roads.

**TABLE 5**  
**POINT SOURCE PARAMETERS**

| Source                                  | Release Type | Center (UTM X, UTM Y) | Release Height (m) | Exit Velocity (m/s) | Exit Temperature (K) | Diameter (m) |
|-----------------------------------------|--------------|-----------------------|--------------------|---------------------|----------------------|--------------|
| Chips cleaning line                     | Vertical     | (430412, 5203082)     | 15.0               | 15.7                | 283.2                | 1.20         |
| Wet hammer mill 1 pneumatic system      | Vertical     | (430455, 5203054)     | 15.0               | 17.7                | 283.2                | 0.60         |
| Wet hammer mill 2 pneumatic system      | Vertical     | (430462, 5203054)     | 15.0               | 17.7                | 283.2                | 0.60         |
| Drying line WESP/RTO                    | Vertical     | (430389, 5203010)     | 27.0               | 15.4                | 328.2                | 2.20         |
| Dry milling & pellet line RCO           | Vertical     | (430640, 5203064)     | 27.0               | 18.6                | 374.2                | 2.10         |
| Dry product intermediate storage        | Horizontal   | (430550, 5203018)     | 13.0               | 13.4                | 283.2                | 0.84         |
| Dry product intermediate storage        | Horizontal   | (430556, 5203018)     | 13.0               | 13.4                | 283.2                | 0.84         |
| Milled dry product intermediate storage | Horizontal   | (430625, 5203028)     | 11.0               | 13.4                | 283.2                | 0.84         |
| Silo 1                                  | Vertical     | (430583, 5203118)     | 28.0               | 13.8                | 283.2                | 0.84         |
| Silo 2                                  | Vertical     | (430617, 5203118)     | 28.0               | 13.8                | 283.2                | 0.84         |
| Silo 3                                  | Vertical     | (430650, 5203118)     | 28.0               | 13.8                | 283.2                | 0.84         |
| Silo 4                                  | Vertical     | (430583, 5203077)     | 28.0               | 13.8                | 283.2                | 0.84         |
| Silo 5                                  | Vertical     | (430617, 5203077)     | 28.0               | 13.8                | 283.2                | 0.84         |
| Emergency generator                     | Vertical     | (430415, 5203000)     | 2.7                | 130.3               | 822.2                | 0.10         |

NOTES: m = meter; m/s = meter per second; K = degrees Kelvin; UTM = Universal Transverse Mercator; N/A = not applicable

**TABLE 6**  
**VOLUME AND AREA SOURCE PARAMETERS**

| Source                                      | Source Type     | Configuration/Location                                    | Release Height (m) | Initial Horizontal Dimension (m) | Initial Vertical Dimension (m) |
|---------------------------------------------|-----------------|-----------------------------------------------------------|--------------------|----------------------------------|--------------------------------|
| White wood storage pile                     | Polygon Area    | Dimension of the storage pile                             | 3.05               | N/A                              | 1.4                            |
| Ground chips storage pile                   | Polygon Area    | Dimension of the storage pile                             | 3.05               | N/A                              | 1.4                            |
| Hog fuel wood storage pile                  | Polygon Area    | Dimension of the storage pile                             | 3.05               | N/A                              | 1.4                            |
| Truck route for white wood delivery         | Multiple Volume | Following delivery route; entry and exit                  | 2.55               | 9.0                              | 5.1                            |
| Truck route for ground chips delivery       | Multiple Volume | Following delivery route; entry and exit                  | 2.55               | 9.0                              | 5.1                            |
| Truck route for hog fuel delivery           | Multiple Volume | Following delivery route; entry and exit                  | 2.55               | 9.0                              | 5.1                            |
| Truck route for product loadout             | Multiple Volume | Following delivery route; entry and exit                  | 2.55               | 9.0                              | 5.1                            |
| Front end loader activity for white wood    | Multiple Volume | Following loader paths to unload truck and load floor bin | 4.46               | 10.7                             | 8.9                            |
| Front end loader activity for ground chips  | Multiple Volume | Following loader paths to unload truck and load floor bin | 4.46               | 10.7                             | 8.9                            |
| Front end loader activity for hog fuel wood | Multiple Volume | Following loader paths to unload truck and load floor bin | 4.46               | 10.7                             | 8.9                            |
| Product truck loading                       | Volume          | Dimensions of the truck loading bucket                    | 3.04               | 1.9                              | 10.2                           |

NOTES: m = meter; m/s = meter per second; N/A = not applicable

Emissions for all sources were calculated on a PTE basis and represent the maximum expected emissions from facility operations as described in Section 3 for point sources and presented in Appendix C for fugitive sources. Emissions from the emergency engine were estimated using 100 hours/year, per 40 CFR 60, Subpart IIII for emergency engines. The occurrence of maintenance and testing of this unit was assumed to only contribute to a maximum of one hour runtime on any given day for the 24-hour PM<sub>10</sub>, 24-hour PM<sub>2.5</sub>, 1-hour nitrogen dioxide (NO<sub>2</sub>), 1-hour carbon monoxide (CO), and 8-hour CO national ambient air quality standards (NAAQS).

## 7 Air Dispersion Modeling Analysis

### 7.1 Toxic Air Pollutant Modeling

The Washington TAP program requires that where any predicted TAP emission rates would exceed their corresponding SQER values, the project proponent must show via dispersion modeling, that the predicted maximum concentrations do not exceed their corresponding ASIL concentration. The SQER and ASIL values are codified in WAC 173-460-150. As shown in Table 2 in Section 4.7 of this report, PNWRE identified 12 predicted TAP emissions rates that exceeded their SQER values and thus require dispersion modeling as part of the first-tier analysis. **Table 7** summarizes the results of the dispersion modeling and shows that the modeled concentrations are less than their respective ASIL values.

**TABLE 7**  
**MODELING RESULTS FOR TOXIC AIR POLLUTANTS**

| CAS Registry Number | TAP Name                        | Averaging Period | Emission Rate (lb/averaging period) | SQER <sup>1</sup> (lb/averaging period) | ASIL <sup>1</sup> (µg/m <sup>3</sup> ) | Modeling Result (µg/m <sup>3</sup> ) |
|---------------------|---------------------------------|------------------|-------------------------------------|-----------------------------------------|----------------------------------------|--------------------------------------|
| 57-97-6             | 7,12-Dimethylbenz(a) anthracene | year             | 1.72E-03                            | 1.40E-03                                | 8.50E-06                               | 1.42E-08                             |
| 75-07-0             | Acetaldehyde                    | year             | 3.29E+02                            | 6.00E+01                                | 3.70E-01                               | 8.58E-03                             |
| 107-02-8            | Acrolein                        | 24-hr            | 1.39E+00                            | 2.60E-02                                | 3.50E-01                               | 4.09E-02                             |
| 71-43-2             | Benzene                         | year             | 6.90E+01                            | 2.10E+01                                | 1.30E-01                               | 1.03E-02                             |
| 50-00-0             | Formaldehyde                    | year             | 6.27E+02                            | 2.70E+01                                | 1.70E-01                               | 1.33E-02                             |
| 7440-38-2           | Arsenic                         | year             | 1.61E+00                            | 4.90E-02                                | 3.00E-04                               | 6.21E-06                             |
| 7440-41-7           | Beryllium                       | year             | 8.07E-02                            | 6.80E-02                                | 4.20E-04                               | 3.12E-07                             |
| 7440-43-9           | Cadmium                         | year             | 4.14E-01                            | 3.90E-02                                | 2.40E-04                               | 1.89E-06                             |
| CRVICOMP            | Chromium, hexavalent            | year             | 2.53E-01                            | 6.50E-04                                | 4.00E-06                               | 9.68E-07                             |
| 7439-96-5           | Manganese                       | 24-hr            | 3.17E-01                            | 2.20E-02                                | 3.00E-01                               | 1.14E-02                             |
| 7439-97-6           | Mercury                         | 24-hr            | 1.39E-02                            | 2.20E-03                                | 3.00E-02                               | 5.03E-04                             |
| 7440-02-0           | Nickel                          | year             | 2.61E+00                            | 6.20E-01                                | 3.80E-03                               | 1.05E-05                             |

NOTES: CAS = Chemical Abstract Service; µg/m<sup>3</sup> = micrograms per cubic meter; ASIL = Acceptable Source Impact Level; hr = hour; lb = pounds; N/A = not applicable; SQER = Small Quantity Emission Rate; TAP = toxic air pollutant

<sup>1</sup> SQER and ASIL values are from Washington Administrative Code 173-460-150.

## 7.2 National Ambient Air Quality Standards Modeling

ORCAA guidance for ambient air quality analyses suggests using an approved screening method to predict emissions impacts and compare them to the significance levels in ORCAA's rule 6.1.4 (Table 6.1.b).<sup>20</sup> If impacts are less than the insignificant impact thresholds, it can be concluded that the proposed source will not contribute to a violation of a standard. Based on engineering judgement, increases in PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>2</sub>, and CO emissions from the project would exceed the insignificant impact thresholds. Therefore, a cumulative NAAQS analysis would be required to demonstrate that the project would not cause or contribute to a violation of the NAAQS.

In a cumulative NAAQS analysis, the scope of the analysis is expanded from the SIL analysis to include impacts from nearby sources by including background concentrations. Background concentrations in **Table 8** were obtained from NW-AIRQUEST.<sup>21</sup> For each pollutant and averaging period, the concentration of the closest grid point to the proposed facility (coordinates 46.99, -123.89) was used.

<sup>20</sup> ORCAA, 2023. Ambient Air Quality Analysis Fact Sheet. Available: [https://www.orcaa.org/wp-content/uploads/AAQA-Fact-Sheet\\_2023.pdf](https://www.orcaa.org/wp-content/uploads/AAQA-Fact-Sheet_2023.pdf). Accessed July 14, 2023.

<sup>21</sup> Idaho DEQ, 2023. Background Concentrations 2014-2017. Available: <https://idahodeq.maps.arcgis.com/apps/MapSeries/index.html?appid=0c8a006e11fe4ec5939804b873098dfe>.

**TABLE 8**  
**BACKGROUND CONCENTRATIONS**

| Pollutant         | Averaging Period | Background Concentration | Unit of Measure   |
|-------------------|------------------|--------------------------|-------------------|
| PM <sub>10</sub>  | 24-hour          | 42.1                     | µg/m <sup>3</sup> |
| PM <sub>2.5</sub> | 24-hour          | 12.5                     | µg/m <sup>3</sup> |
|                   | Annual           | 5.1                      | µg/m <sup>3</sup> |
| NO <sub>2</sub>   | 1-hour           | 15.1                     | ppb               |
|                   | Annual           | 2.6                      | ppb               |
| CO                | 1-hour           | 1.04                     | ppm               |
|                   | 8-hour           | 0.69                     | ppm               |

NOTES: µg/m<sup>3</sup> = micrograms per cubic meter; ppb = parts per billion; ppm = parts per million; CO = carbon monoxide; NO<sub>2</sub> = nitrogen dioxide; PM<sub>2.5</sub> = particulate matter 2.5 microns or less in diameter; PM<sub>10</sub> = particulate matter 10 microns or less in diameter

**Table 9** shows the modeled concentrations for the proposed PNWRE facility. All criteria pollutant concentrations are below the NAAQS. Therefore, the proposed facility has been demonstrated to be in compliance with the NAAQS.

**TABLE 9**  
**NATIONAL AMBIENT AIR QUALITY STANDARDS MODEL RESULTS**

| Pollutant                              | Averaging Period | Design Concentration | Modeled Concentration | Total Concentration | NAAQS | Exceeds NAAQS? (Yes/No) |
|----------------------------------------|------------------|----------------------|-----------------------|---------------------|-------|-------------------------|
| PM <sub>10</sub> (µg/m <sup>3</sup> )  | 24-hour          | H6H                  | 79.8                  | 122                 | 150   | No                      |
| PM <sub>2.5</sub> (µg/m <sup>3</sup> ) | 24-hour          | H8H                  | 11.6                  | 24.1                | 35    | No                      |
|                                        | Annual           |                      | 3.86                  | 8.96                | 12    | No                      |
| NO <sub>2</sub> (ppb)                  | 1-hour           | H8H                  | 68.6                  | 83.7                | 100   | No                      |
|                                        | Annual           |                      | 0.818                 | 3.42                | 53    | No                      |
| CO (ppm)                               | 1-hour           | H2H                  | 0.381                 | 1.42                | 35    | No                      |
|                                        | 8-hour           | H2H                  | 0.0809                | 0.771               | 9     | No                      |

NOTES: µg/m<sup>3</sup> = micrograms per cubic meter; ppb = parts per billion; ppm = parts per million; CO = carbon monoxide; NAAQS = national ambient air quality standard; NO<sub>2</sub> = nitrogen dioxide; PM<sub>2.5</sub> = particulate matter 2.5 microns or less in diameter; PM<sub>10</sub> = particulate matter 10 microns or less in diameter



## **INSTRUCTIONS FOR FORM 6 BEST AVAILABLE CONTROL TECHNOLOGY (BACT)**

BACT by definition is the most effective control option which is technically feasible considering economic, energy, and other environmental impacts. Control options can be eliminated as BACT on a basis of technical, economic, energy, or environmental considerations. The following procedure is designed to facilitate a BACT analysis in cookbook fashion. The following analysis should be performed for each pollutant requiring BACT.

**STEP 1: IDENTIFY AVAILABLE CONTROL TECHNOLOGIES:** For the source, emissions unit, activity, or process requiring BACT, identify and list all "available" emissions control options for the pollutant in question. Available control options are those air pollution control technologies and techniques with a practical potential for application to the source, emissions unit, activity, or process. In general, any control option in commercial use in the U.S. at the time the analysis is performed should be included on the list of available control options. One very good resource for obtaining listings of control options in use for a particular source type is the U.S. EPA BACT/LAER Clearinghouse (RBLC) which can be viewed at <http://cfpub.epa.gov/RBLC/>.

**STEP 2: ELIMINATE TECHNICALLY INFEASIBLE OPTIONS:** Considering site-specific factors and constraints, remove from the list compiled in STEP 1 all technically infeasible control options. A control option can be considered as technically infeasible if technical difficulties such as physical, chemical, or engineering constraints would preclude the successful use of the control option in the particular application in question. For all control options eliminated, demonstration that a control option is technically infeasible should be clearly documented in the BACT Analysis and included with the BACT submittal.

**STEP 3: RANK REMAINING CONTROL TECHNOLOGIES BY CONTROL EFFECTIVENESS:** Rank and list in attached table all remaining control options in order of control effectiveness with the most effective control alternative at the top of the list.

**STEP 4: ENERGY, ENVIRONMENTAL, AND ECONOMIC CONSIDERATIONS:** Using the "Top Down" procedure specified below, control options may be eliminated as BACT candidates on the basis of energy, environmental, and economic impacts of the option.

Energy impacts include but are not limited to energy efficiency impacts, fuel cycle efficiency considerations, and fuel availability. Environmental impacts include but are not limited to ground water and water impacts, solid and hazardous waste impacts, and air quality impacts from increases in emissions of other air pollutants that result from implementing the control option. Economic impacts include the sum of up-front capital cost and annual operation and maintenance costs of implementing the control option.

A control option may be eliminated as a BACT candidate on grounds of significant energy, environmental, or economic impacts. Rationale for eliminating a control option should be well documented and included in the analysis. Economic impacts should be evaluated by comparing the cost effectiveness of the control option with generally acceptable cost effectiveness ranges for control of the particular pollutant in question. Inquire with ORCAA on the generally acceptable ranges of cost effectiveness.

**STEP 4, TOP DOWN PROCEDURE:**

**STEP 4.A:** Start with the most effective control option from the list compiled in STEP 3.

**STEP 4.B:** Provide the information specified in items a through g below for the control option being considered. The attached table is provided for convenience of organizing this information.

**a. Control Efficiency:** Enter the percent of the pollutant removed by the control option. Control efficiency should be calculated based on the control achieved from the control option in question only.

**b. Potential Emissions:** Potential emissions in pounds of pollutant per hour and tons of pollutant per year should be calculated based on the maximum potential to emit rather than actual emissions. Potential emissions represent the maximum capacity of a source, emissions unit, process, or activity to emit an air pollutant under physical constraints considering air pollutant emission controls and applicable regulatory limits. Operational factors such as hours of operation or partial loading which influence emissions may be included as constraints which limit the potential to emit provided that the project proponent agrees to incorporate these constraints in enforceable regulatory compliance limits.

**c. Expected Emissions:** Expected emissions in tons of pollutant per year should be calculated considering expected operational considerations such as down time for maintenance, periods of partial load, capacity factors, etc.

**d. Annual Expected Emission Reduction:** Using the expected emission rate computed in "c" and control efficiency entered in "a", compute the expected annual emission reduction in tons per year.

**e. Annual Cost of Control Option:** Compute the annual cost of the control option using standard economic principles. Annual cost should include both the initial capital costs as well as operation and maintenance costs. All costs should be amortized over the expected life of the control option (default is ten years). Include in the analysis the calculations, assumptions, and economic parameters used in the calculations.

**f. Cost Effectiveness:** Cost effectiveness is the ratio of the annual cost computed in "e" to the annual expected emission reduction computed in "d".

**g. Other Considerations:** List all other media impacts (water, solid waste, etc.) and energy impacts which are associated with the control option.

**STEP 4.C:** If there are no outstanding issues regarding energy, environmental and economic impacts, the analysis is ended and this control option is proposed as BACT.

**STEP 4.D:** In the event that the control option is determined to be inappropriate due to energy, environmental, or economic impacts, this control option is eliminated and the analysis proceeds to the next control option on the list. Rationale for elimination of a control option on grounds of significant energy, environmental or economic impacts should be well documented and included with the analysis.

**STEP 4.E:** Go to STEP 4.B and proceed with the analysis for the next control option on the list.

**STEP 5: DOCUMENTATION:** Include with the analysis all information, calculations, assumptions, and data used in making the BACT determination.

# **FORM 6** **BACT ANALYSIS TABLE**

| <b>Emission Unit:</b>  |                                               |                                             |                                             |                                                      |                                 |                                            |                                                                  |
|------------------------|-----------------------------------------------|---------------------------------------------|---------------------------------------------|------------------------------------------------------|---------------------------------|--------------------------------------------|------------------------------------------------------------------|
| <b>CONTROL OPTIONS</b> | <b>CONTROL<br/>EFFICIENCY<br/>(% removal)</b> | <b>POTENTIAL<br/>EMISSIONS<br/>(lbs/hr)</b> | <b>EXPECTED<br/>EMISSIONS<br/>(tons/yr)</b> | <b>ANNUAL<br/>EMISSION<br/>REDUCTIONS<br/>(tons)</b> | <b>ANNUAL<br/>COST<br/>(\$)</b> | <b>COST<br/>EFFECTIVENESS<br/>(\$/ton)</b> | <b>ENERGY,<br/>ENVIRONMENTAL<br/>ECONOMIC IMPACTS<br/>(list)</b> |
| 1.                     |                                               |                                             |                                             |                                                      |                                 |                                            |                                                                  |
| 2.                     |                                               |                                             |                                             |                                                      |                                 |                                            |                                                                  |
| 3.                     |                                               |                                             |                                             |                                                      |                                 |                                            |                                                                  |
| 4.                     |                                               |                                             |                                             |                                                      |                                 |                                            |                                                                  |
| 5.                     |                                               |                                             |                                             |                                                      |                                 |                                            |                                                                  |
| 6.                     |                                               |                                             |                                             |                                                      |                                 |                                            |                                                                  |

**REGULATIONS**  
of the  
**OLYMPIC REGION CLEAN AIR AGENCY**  
Clallam, Grays Harbor, Jefferson, Mason, Pacific  
and Thurston Counties  
**ADOPTED BY THE BOARD OF DIRECTORS**  
**ON DECEMBER 3, 1969**

Telephone:  
Olympia: 360-539-7610  
1-800-422-5623  
**FAX:** 360-491-6308  
**EMAIL:** [info@orcaa.org](mailto:info@orcaa.org)  
**HOMEPAGE:** [www.orcaa.org](http://www.orcaa.org)

**NOTICE**

The regulations, rules, and emission standards of the Olympic Region Clean Air Agency (ORCAA), and as described on the following pages are the basic law for the geographical area covered and are the priority regulations for the same subject matter covered by other laws concerning air pollution control.

Other Reference in Law Concerning

**AIR POLLUTION IN THE STATE OF WASHINGTON**

- (1) Chapter 70A.15 Revised Code of Washington, the State Clean Air Act: and related administrative codes of the State of Washington Department of Ecology, Title 173 WAC.
- (2) United States Public Law 101-549, Clean Air amendments of 1990: and related regulations and standards of the U.S. Environmental Protection Agency as found in the Federal Register.





# TABLE OF CONTENTS

|                                                                  |           |
|------------------------------------------------------------------|-----------|
| <b>REGULATION 1 – GENERAL PROVISION.....</b>                     | <b>1</b>  |
| Rule 1.1 Policy .....                                            | 1         |
| Rule 1.2 Name of Agency.....                                     | 1         |
| Rule 1.3 Short Title .....                                       | 1         |
| Rule 1.4 Definitions .....                                       | 1         |
| Rule 1.5 Executive Director – Powers and Duties.....             | 11        |
| Rule 1.6 Confidential Information.....                           | 13        |
| Rule 1.7 Appointment of Hearing Officer .....                    | 13        |
| Rule 1.8 Appeals from Board Orders.....                          | 13        |
| Rule 1.9 Severability.....                                       | 14        |
| Rule 1.10 Service of Notice .....                                | 14        |
| Rule 1.11 Federal Regulation Reference Date.....                 | 14        |
| Rule 1.12 State Regulations Reference Date.....                  | 14        |
| <b>REGULATION 2 – ENFORCEMENT PROCEDURES AND PENALTIES .....</b> | <b>15</b> |
| Rule 2.1 Voluntary Compliance.....                               | 15        |
| Rule 2.3 Variances .....                                         | 15        |
| Rule 2.4 Notices of Violations.....                              | 15        |
| Rule 2.5 Regulatory Actions and Penalties .....                  | 15        |
| Rule 2.6 Compliance Schedules .....                              | 17        |
| <b>REGULATION 3 – FEES.....</b>                                  | <b>19</b> |
| Rule 3.1 Annual Registration Fees .....                          | 19        |
| Table 3.1: Pollutants Considered For Fees .....                  | 20        |
| Rule 3.2 Operating Permit Fees .....                             | 20        |
| Table 3.2a: Operating Permit Fee Formulas .....                  | 23        |
| Rule 3.3 Notice of Construction Fees.....                        | 24        |
| Table 3.3: Additional NOC Processing Fees .....                  | 26        |

|                                                                                                                                             |           |
|---------------------------------------------------------------------------------------------------------------------------------------------|-----------|
| <b>Rule 3.4 Outdoor Burning Permit Fees .....</b>                                                                                           | <b>26</b> |
| <b>Rule 3.5 Asbestos Fees .....</b>                                                                                                         | <b>26</b> |
| <b>Rule 3.6 Notice of Intent to Operate Fees.....</b>                                                                                       | <b>27</b> |
| <b>REGULATION 4 – REGISTRATION .....</b>                                                                                                    | <b>29</b> |
| <b>Rule 4.1 Registration Required .....</b>                                                                                                 | <b>29</b> |
| <b>Rule 4.2 Registration Program .....</b>                                                                                                  | <b>33</b> |
| <b>Rule 4.3 Requirements for Stationary Sources Subject to Registration .....</b>                                                           | <b>34</b> |
| <b>Rule 4.4 Classification of Sources Required to Register with Agency .....</b>                                                            | <b>35</b> |
| Table 4.4a: Pollutants .....                                                                                                                | 35        |
| Table 4.4b: Registration Classification (RC).....                                                                                           | 35        |
| <b>REGULATION 5 – OPERATING PERMIT PROGRAM.....</b>                                                                                         | <b>37</b> |
| <b>Rule 5.1 Operating Permit Program .....</b>                                                                                              | <b>37</b> |
| <b>Rule 5.2 (Reserved) .....</b>                                                                                                            | <b>37</b> |
| <b>Rule 5.3 Restricting the Potential to Emit .....</b>                                                                                     | <b>37</b> |
| <b>REGULATION 6 – REQUIRED PERMITS AND NOTIFICATIONS.....</b>                                                                               | <b>39</b> |
| <b>Rule 6.1 Notice of Construction Required.....</b>                                                                                        | <b>39</b> |
| Rule 6.1.1 (Reserved) .....                                                                                                                 | 43        |
| Rule 6.1.2 Application Processing.....                                                                                                      | 43        |
| Rule 6.1.3 Public Involvement.....                                                                                                          | 45        |
| Table 6.1a: Significant Emissions Increase .....                                                                                            | 46        |
| Rule 6.1.4 Requirements for Approval .....                                                                                                  | 49        |
| Table 6.1.b Insignificant Impact Thresholds .....                                                                                           | 49        |
| Rule 6.1.5 Notice of Completion – Order of Violation .....                                                                                  | 51        |
| Rule 6.1.6 Time Limit on Approval of Construction.....                                                                                      | 52        |
| Rule 6.1.7 (Reserved) .....                                                                                                                 | 52        |
| Rule 6.1.8 Conditions in Orders of Approval Enforceable.....                                                                                | 52        |
| Rule 6.1.9 Work Done Without Approval .....                                                                                                 | 52        |
| Rule 6.1.10 Requirements for Replacement or Substantial Alteration of Emission Control<br>Technology at an Existing Stationary Source ..... | 52        |
| Rule 6.1.11 Change of Conditions.....                                                                                                       | 53        |
| Rule 6.1.12 Voluntary Limits on Emissions.....                                                                                              | 54        |
| <b>Rule 6.2 Outdoor Burning.....</b>                                                                                                        | <b>54</b> |
| Rule 6.2.1 The provisions of this rule apply to:.....                                                                                       | 54        |
| Rule 6.2.2 Definitions .....                                                                                                                | 55        |
| Rule 6.2.3 No Burn Areas:.....                                                                                                              | 56        |
| Rule 6.2.4 Summer Burn Restrictions .....                                                                                                   | 56        |

|                                                                                                             |           |
|-------------------------------------------------------------------------------------------------------------|-----------|
| Rule 6.2.5 Prohibitions and restrictions .....                                                              | 56        |
| Rule 6.2.6 Curtailment.....                                                                                 | 56        |
| Rule 6.2.7 Recreational Burning.....                                                                        | 57        |
| Rule 6.2.8 Permit Program.....                                                                              | 57        |
| <b>Rule 6.3 Asbestos .....</b>                                                                              | <b>58</b> |
| Rule 6.3.1 Definitions .....                                                                                | 58        |
| Rule 6.3.2 Asbestos Survey Requirements .....                                                               | 60        |
| Rule 6.3.3 Controlled and Regulated Substances .....                                                        | 61        |
| Rule 6.3.4 Notification Requirements .....                                                                  | 61        |
| Rule 6.3.5 Annual Notification .....                                                                        | 63        |
| Rule 6.3.6 Asbestos Project Amendments.....                                                                 | 63        |
| Rule 6.3.7 Emergencies—Exceptions to Advance Notification Period .....                                      | 63        |
| Rule 6.3.8 Asbestos Removal Requirements Prior to Renovation or Demolition.....                             | 63        |
| Rule 6.3.9 Procedures for Asbestos Projects .....                                                           | 64        |
| Rule 6.3.10 Disposal of Asbestos-Containing Waste Material.....                                             | 65        |
| Rule 6.3.11 Compliance with other Rules .....                                                               | 66        |
| <b>Rule 6.4 Notice of Intent to Operate.....</b>                                                            | <b>66</b> |
| <b>REGULATION 7 – PROHIBITIONS .....</b>                                                                    | <b>69</b> |
| <b>Rule 7.1 Interference or Obstruction .....</b>                                                           | <b>69</b> |
| <b>Rule 7.2 False or Misleading Statements .....</b>                                                        | <b>69</b> |
| <b>Rule 7.3 Unlawful Reproduction or Alteration of Documents.....</b>                                       | <b>69</b> |
| <b>Rule 7.4 Display of Orders and Certificates: Removal or Mutilation Prohibited .....</b>                  | <b>69</b> |
| <b>Rule 7.5 Emission of Air Contaminant – Concealment and Masking .....</b>                                 | <b>69</b> |
| <b>Rule 7.6 Emissions of Air contaminant or Water Vapor: Detriment to Persons and/or<br/>Property .....</b> | <b>69</b> |
| <b>REGULATION 8 – PERFORMANCE STANDARDS.....</b>                                                            | <b>71</b> |
| <b>Rule 8.1 Wood Heating .....</b>                                                                          | <b>71</b> |
| Rule 8.1.1 Definitions .....                                                                                | 71        |
| Rule 8.1.2 General Emission Standards.....                                                                  | 72        |
| Rule 8.1.3 Prohibited Fuel Types .....                                                                      | 72        |
| Rule 8.1.4 Curtailment.....                                                                                 | 73        |
| Rule 8.1.5 Exemptions.....                                                                                  | 74        |
| Rule 8.1.6 Penalties.....                                                                                   | 74        |
| Rule 8.1.7 Sale and Installation of Uncertified Woodstoves .....                                            | 74        |
| Rule 8.1.8 Disposal of Uncertified Woodstoves.....                                                          | 74        |
| <b>Rule 8.2 General Standards for Maximum Visual Emissions .....</b>                                        | <b>75</b> |
| <b>Rule 8.3 General Standards for Maximum Particulate Matter.....</b>                                       | <b>75</b> |

|                                                                                                                                        |           |
|----------------------------------------------------------------------------------------------------------------------------------------|-----------|
| <b>Rule 8.4 Incineration Operation .....</b>                                                                                           | <b>76</b> |
| <b>Rule 8.5 Odor Control Measures.....</b>                                                                                             | <b>76</b> |
| <b>Rule 8.6 Emission of Toxic Air Pollutants.....</b>                                                                                  | <b>77</b> |
| <b>Rule 8.7 Reporting of Excess Emissions .....</b>                                                                                    | <b>77</b> |
| <b>Rule 8.8 Control Equipment – Maintenance and Repair.....</b>                                                                        | <b>78</b> |
| <b>Rule 8.9 Burning Used Oil in Land Based Facilities.....</b>                                                                         | <b>78</b> |
| <b>Rule 8.10 Fluorides.....</b>                                                                                                        | <b>78</b> |
| Table 8.10a Maximum Allowable Fluoride .....                                                                                           | 79        |
| <b>Rule 8.11 Record Keeping and Reporting.....</b>                                                                                     | <b>79</b> |
| <b>Rule 8.12 Gasoline Dispensing Facilities .....</b>                                                                                  | <b>80</b> |
| Rule 8.12.1 Definitions .....                                                                                                          | 80        |
| Rule 8.12.2 General Requirements .....                                                                                                 | 81        |
| Rule 8.12.3 Vapor Recovery Requirements .....                                                                                          | 81        |
| Rule 8.12.4 Testing Requirements.....                                                                                                  | 82        |
| Table 1: Performance Testing.....                                                                                                      | 83        |
| Rule 8.12.5 Self-Inspection Requirements .....                                                                                         | 84        |
| Rule 8.12.6 Recordkeeping Requirements.....                                                                                            | 84        |
| <b>Rule 8.13 (Reserved) .....</b>                                                                                                      | <b>84</b> |
| <b>Rule 8.14 Adoption of Federal New Source Performance Standards (NSPS) .....</b>                                                     | <b>84</b> |
| <b>Rule 8.15 Adoption of National Emissions Standards for Hazardous Air Pollutants<br/>    (NESHAP) .....</b>                          | <b>86</b> |
| <b>Rule 8.17 Adoption of National Emissions Standards for Hazardous Air Pollutants for<br/>    Source Categories .....</b>             | <b>86</b> |
| <b>Rule 8.18 Adoption of Federal Consolidated Requirements for the Synthetic Organic<br/>    Chemical Manufacturing Industry .....</b> | <b>87</b> |
| <b>APPENDIX A - ADOPTED FEDERAL REGULATIONS AND STANDARDS .....</b>                                                                    | <b>89</b> |

# REGULATION 1 – GENERAL PROVISION

## RULE 1.1 POLICY

The Olympic Region Clean Air Agency (Agency), consisting of the counties of Clallam, Grays Harbor, Jefferson, Mason, Pacific and Thurston, having formed pursuant to chapter 70A.15 RCW, as amended, adopts the following Regulations to control the emission of air contaminants from sources within the jurisdiction of the Agency: to provide for the uniform administration and enforcement of these Regulations: and to administer the requirements and purposes of chapter 70A.15 RCW, as amended, and the Federal Clean Air Act.

It is hereby declared to be the public policy of the Olympic Region Clean Air Agency to secure and maintain such levels of air quality as will protect human health and safety; and, to the greatest degree practicable, prevent injury to plant and animal life and to property; and be consistent with the social, economic, and industrial well-being of the territory of the Agency.  
[Adopted 08/17/06; Amended 02/26/22]

## RULE 1.2 NAME OF AGENCY

The name of the multi-county air pollution control authority comprised of the activated or inactivated air pollution control authorities of Clallam County, Grays Harbor County, Jefferson County, Mason County, Pacific County, and Thurston County will be known and cited as the “Olympic Region Clean Air Agency.”  
[Adopted 08/17/06; Amended 02/26/22]

## RULE 1.3 SHORT TITLE

These Regulations may be known and cited as “Regulations of the Olympic Region Clean Air Agency.”  
[Adopted 08/17/06]

## RULE 1.4 DEFINITIONS

When used in regulations of the Olympic Region Clean Air Agency, the following definitions will apply, unless defined otherwise in individual Regulations:

**“Actual Emissions”** means the actual rate of emissions of a pollutant from an emission unit, as determined in accordance with (a) through (c) of this rule.

- (a) In general, actual emissions as of a particular date must equal the average rate, in tons per year, at which the emission unit actually emitted the pollutant during a two-year period which precedes the particular date, and which is representative of normal source operation. The Agency must allow the use of a different time period upon determination that it is more representative of normal source rates, and types of materials processed, stored, or combusted during the selected time operation. Actual emissions must be calculated using the emissions unit’s actual operating hours, production period.
- (b) The Agency may presume that source-specific allowable emissions for the unit are equivalent to the actual emissions of the emissions unit.

- (c) For an emissions unit that has not begun normal operations on the particular date, actual emissions will equal the potential to emit of the emissions unit on that date.

**“Agency”** shall mean the same as “Authority.”

**“Agriculture or Agricultural”** means the growing of crops, the raising of fowl or animals as gainful occupation.

**“Air Contaminant”** means dust, fumes, mist, smoke, other particulate matter, vapor, gas, odorous substance, or any combination thereof. “Air pollutant” means the same as “air contaminant.”

**“Air Pollution”** means the presence in the outdoor atmosphere of one or more air contaminants in sufficient quantities, and of such characteristics and duration as is, or is likely to be, injurious to human health, plant or animal life, property, or which unreasonably interferes with enjoyment of life and property. For these Regulations, air pollution does not include air contaminants emitted in compliance with chapter 17.21 RCW, the Washington Pesticide Application Act, which regulates the application and control of the use of various pesticides.

**“Allowable Emissions”** means the emission rate of a source calculated using the maximum rated capacity of the source (unless the source is subject to federally enforceable limits which restrict the operating rate, or hours of operation, or both) and the most stringent of the following:

- (a) The applicable standards as set forth in 40 CFR part 60, 61, or 63;
- (b) Any applicable state implementation plan emissions limitation including those with a future compliance date; or,
- (c) The emissions rate specified as a federally enforceable permit condition, including those with future compliance date.

**“Alteration”** means the act of altering, which means to change or make different and includes any addition to or enlargement or replacement; or change of the design, capacity, process or arrangement; or any increase in the connected loading of equipment or control facility; or any change in fuels, method of operation or hours of operation not previously approved by the Agency through a Notice of Construction Approval, which would increase or adversely affect the kind or amount of air contaminant emitted by a stationary source.

**“Ambient Air”** means the surrounding outside air.

**“Ambient Air Quality Standard”** means an established concentration, exposure time, and frequency of occurrence of air contaminant(s) in the ambient air, which must not be exceeded.

**“Attainment Area”** means a geographic area designated by EPA at 40 CFR Part 81 as having attained the National Ambient Air Quality Standard for a given criteria pollutant.

**“Authority”** means the Olympic Region Clean Air Agency. “Agency” shall mean the same as “Authority.”

**“Begin Actual Construction”** means, in general, initiation of physical on-site construction activities on an emission unit, which are of a permanent nature. Such activities include, but are not limited to, installation of building supports and foundations, laying underground pipe work and construction of permanent storage structures. With respect to a change in method of operations, this term refers to those on-site activities other than preparatory activities which mark the initiation of the change.

**“Best Available Control Technology (BACT)”** means an emission limitation based on the maximum degree of reduction for each air pollutant subject to regulation under chapter 70A.15 RCW emitted from or which results from any new or modified stationary source which the permitting agency, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such stationary source or modification through application of production processes and available methods, systems, and techniques, including fuel cleaning, clean fuels, or treatment or innovative fuel combustion techniques for control of such air pollutant. In no event must application of the best available control technology result in emissions of any pollutants which would exceed the emissions allowed by any applicable standard under 40 CFR Part 60, Part 61, and Part 62. Emissions from any stationary source utilizing clean fuels, or any other means, to comply with this paragraph must not be allowed to increase above levels that would have been required under definition of BACT in the Federal Clean Air Act as it existed prior to enactment of the Clean Air Act Amendments of 1990.

**“Board”** means the Board of Directors of the Olympic Region Clean Air Agency.

**“Bubble”** means a set of emission limits which allows an increase in emissions from a given emissions unit in exchange for a decrease in emissions from another emissions unit, pursuant to RCW 70A.15.2240 and Rule 6.1.12 of Regulation 6.

**“Commenced”** as applied to “Construction” means that the owner or operator has all the necessary pre-construction approvals or permits and either has:

- (a) Begun, or caused to begin, a continuous program of actual on-site construction of the source, to be completed within a reasonable time; or
- (b) Entered into binding agreements or contractual obligations, which cannot be canceled or modified without substantial loss to the owner or operator, to undertake a program of actual construction of the source to be completed within a reasonable time.

For this definition, “necessary pre-construction approvals” means those permits or orders of approval required under federal air quality control laws and regulations, including state, local and federal regulations and orders contained in the SIP.

**“Concealment”** means any action taken to reduce the observed or measured concentrations of a pollutant in a gaseous effluent while, in fact, not reducing the total amount of pollutant discharged.

**“Control Apparatus”** means any device that prevents or controls the emission of any air contaminant.



**“Construction”** means any physical change or change in the method of operation (including fabrication, erection, installation, demolition, or modification of an emissions unit) which would result in a change in actual emissions.

**“Criteria Pollutant”** means a pollutant for which there is established a National Ambient Air Quality Standard at 40 CFR Part 50. The criteria pollutants are carbon monoxide (CO), particulate matter, ozone (O<sub>3</sub>), sulfur dioxide (SO<sub>2</sub>), lead (Pb), and nitrogen dioxide (NO<sub>2</sub>).

**“Daylight Hours”** means the hours between official sunrise and official sunset.

**“Ecology”** means the Washington State Department of Ecology.

**“Emission”** means a release of air contaminants into the ambient air.

**“Emission Point”** means the location (place in horizontal plane and vertical elevation) at which an emission enters the atmosphere.

**“Emission reduction credit (ERC)”** means a credit granted pursuant to chapter 173-400 WAC. This is a voluntary reduction in emissions.

**“Emission Standard”** and **“Emission Limitation”** means requirements established under the Federal Clean Air Act or chapter 70A.15 RCW which limits the quantity, rate, or concentration of emissions of air contaminants on a continuous basis, including any requirement relating to the operation or maintenance of a stationary source to assure continuous emission reduction and any design, equipment work practice, or operational standard adopted under the Federal Clean Air Act, chapter 70A.15 RCW.

**“Emission Unit”** means any part of a stationary source or source which emits or would have a potential to emit any pollutant subject to regulation under the Federal Clean Air Act, chapter 70A.15 or 70A.388 RCW.

**“EPA”** means the United States Environmental Protection Agency (USEPA).

**“Equipment”** means any stationary or portable device, or any part thereof, capable of causing the emission of any air contaminant into the atmosphere.

**“Establishment”** means the act of establishing, which means creating, setting up, or putting into practice any equipment, material, fuel, or operational change.

**“Excess Emission”** means emissions of an air pollutant more than the applicable emission standard.

**“Executive Director”** means the Air Pollution Control Officer of the Olympic Region Clean Air Agency.

**“Facility”** means all emission units in the same industrial grouping located on contiguous or adjacent properties and under common ownership and control.

**“Federal Clean Air Act (FCAA)”** means the Federal Clean Air Act, as known as Public Law 88-206, 77 Stat. 392, December 17, 1963, 42 U.S.C. 7401 et seq., as last amended by the Clean Air Act Amendments of 1990, P.L. 101-549, November 15, 1990.

**“Federally Enforceable”** means all limitations and conditions enforceable by EPA, including those requirements developed under 40 CFR Parts 60, 61, and 63, requirements within the Washington SIP, requirements within any permit established under 40 CFR 52.21 or order of approval under a SIP approved new source review regulation, or any voluntary limits on emissions pursuant to Rule 6.1.12 or WAC 173-400-091.

**“Fuel Burning Equipment”** means any equipment, device or contrivance used for the burning of any fuel, and all appurtenances thereto, including ducts, breechings, control equipment, fuel feeding equipment, ash removal equipment, combustion controls, stacks, chimneys, etc., used for indirect heating in which the material being heated is not contacted by and adds no substances to the products of combustion.

**“Fugitive Dust”** means a particulate emission made airborne by forces of wind, man’s activity, or both. Unpaved roads, construction sites, and tilled land are examples of areas that originate fugitive dust. Fugitive dust is a type of fugitive emission.

**“Fugitive Emission”** means emissions that could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening.

**“Garbage”** means refuse, animal, or vegetable matter as from a kitchen, restaurant, or store.

**“Good Engineering Practice (GEP)”** refers to a calculated stack height based on the equation specified in WAC 173-400-200(2)(a)(ii).

**“Hogged-fuel”** means wood slabs, edging, trimmings, etc., which have been put through a “hog” to reduce them to a uniform small size, and includes shavings from planing mills, sawdust from saw-kerfs, bits of bark, chips, and other small-recovered products from the manufacture of wood products or any combination thereof.

**“Incinerator”** means a furnace used primarily for the thermal destruction of waste.

**“In Operation”** means engaged in activity related to the primary design function of the source.

**“Installation”** means the act of installing, which means placing, assembling, or constructing equipment or control equipment at the premises where the equipment or control equipment will be used, and includes all preparatory work at such premises.

**“Light Detection and Ranging (LIDAR)”** means the EPA alternate method 1 determination of the opacity of emissions from stationary sources remotely by LIDAR.

**“Lowest Achievable Emission Rate (LAER)”** means the same as it is defined in WAC 173-400-810.

**“Major Modification”** as it applies to stationary sources subject to requirements for new sources in nonattainment areas means the same as it is defined in WAC 173-400-810.

**“Major Stationary Source”** (a) as it applies to stationary sources subject to requirements for new sources in **nonattainment areas** means the same as it is defined in WAC 173-400-810; or,  
(b) As it applies to stationary sources subject to requirements for new sources in **attainment or unclassified areas** means the same as it is defined in WAC 173-400-710.

**“Masking”** means the mixing of a chemically nonreactive control agent with a malodorous gaseous effluent to change the perceived odor.

**“Material Handling”** means the handling, transporting, loading, unloading, storage, and transfer of material with no significant chemical or physical alteration.

**“Modification”** means any physical change in, or change in the method of operation of, a stationary source that increases the amount of any air contaminant emitted by such stationary source or that result in the emissions of any air contaminant not previously emitted. The term modification will be construed consistent with the definitions of modification in Section 7411, Title 42, United States Code, and with rules implementing that section.

**“National Ambient Air Quality Standards (NAAQS)”** means an ambient air quality standard set by EPA at 40 CFR Part 50 and includes standards for carbon monoxide (CO), particulate matter, ozone (O<sub>3</sub>), sulfur dioxide (SO<sub>2</sub>), lead (Pb), and nitrogen dioxide (NO<sub>2</sub>).

**“National Emission Standards for Hazardous Air Pollutants (NESHAP)”** means the federal rules in 40 CFR Part 61.

**“National Emission Standards for Hazardous Air Pollutants for Source Categories”** means the federal rules in 40 CFR Part 63.

**“Net Emissions Increase”** (a) as it applies to stationary sources subject to requirements for new sources in **nonattainment** areas means the same as it is defined in WAC 173-400-810; or,  
(b) as it applies to stationary sources subject to requirements for new sources in **attainment or unclassified** areas means the same as it is defined in WAC 173-400-710.

**“New Source”** means:

- (a) The construction or modification of a stationary source that increases the amount of any air contaminant emitted by such stationary source or that results in the emission of any air contaminant not previously emitted; and
- (b) Any other project that constitutes a new stationary source under the Federal Clean Air Act.

**“New Source Performance Standards (NSPS)”** means the federal rules set forth in 40 CFR Part 60.

**“Nonattainment Area”** means a geographic area designated by EPA at 40 CFR Part 81 as exceeding a national ambient air quality standard (NAAQS) for a given criteria pollutant. An

area is nonattainment only for the pollutants for which the area has been designated nonattainment.

**“Nonroad Engine”** means:

- (a) Except as discussed in (b) of this rule, a nonroad engine is any internal combustion engine:
  - (1) In or on a piece of equipment that is self-propelled or serves a dual purpose by both propelling itself and performing another function (such as garden tractors, off-highway mobile cranes and bulldozers); or
  - (2) In or on a piece of equipment that is intended to be propelled while performing its function (such as lawnmowers and string trimmers); or
  - (3) That, by itself or in or on a piece of equipment, is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Indicia of transportability include, but are not limited to, wheels, skids, carrying handles, dolly, trailer, or platform.
- (b) An internal combustion engine is not a nonroad engine if:
  - (1) The engine is used to propel a motor vehicle, or a vehicle used solely for competition, or is subject to standards promulgated under section 202 of the Federal Clean Air Act; or
  - (2) The engine is regulated by a New Source Performance Standard promulgated under section 111 or 112 of the Federal Clean Air Act; or
  - (3) The engine otherwise included in (a)(3) of this rule remains or will remain at a location for more than twelve consecutive months or a shorter period of time for an engine located at a seasonal source. A location is a single site at a building, structure, facility, or installation. Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in calculating consecutive time period. An engine located at a seasonal source is an engine that remains at a seasonal source during the full annual operating period of the seasonal source. A seasonal source is a stationary source that operates at a single location approximately three months (or more) each year. The paragraph does not apply to an engine after the engine is removed from the location.

**“Notice of Construction Application”** means a written application to permit construction, installation or establishment of a new stationary source, modification of an existing stationary source, or replacement or substantial alteration of control technology at an existing stationary source.

**“Olympic Air Pollution Control Authority (OAPCA)”** is the former name of Olympic Region Clean Air Agency (ORCAA). Reference to “OAPCA” means the same as ORCAA.

**“Opacity”** means the degree to which an object seen through a plume is obscured, stated as a percentage.

**“Order”** means any order issued by ecology or a local air agency pursuant to chapter 70A.15 RCW, including, but not limited to RCW 70A.15.3011, 70A.15.2520, 70A.15.2210, 70A.15.2220, and 70A.15.2040(3), and includes, where used in the generic sense, the terms order, corrective action order, order of approval, and regulatory order.

**“Order of Approval”** or **“Approval Order”** means a regulatory order issued by Ecology or the Agency to approve the Notice of Construction application for a proposed new source or modification, or the replacement or substantial alteration of control technology at an existing stationary source.

**“Owner”** means person, agent, lessor, lessee, possessor, manager, supervisor, operator, or other responsible party of real property or other assets which includes equipment or control apparatus.

**“Ozone Depleting Substance”** means any substance listed in Appendices A and B to Subpart A of 40 CFR part 82.

**“Particulate Matter”** or **“Particulates”** means any airborne finely divided solid or liquid material with an aerodynamic diameter smaller than 100 micrometers.

**“Parts Per Million (ppm)”** means parts of a contaminant per million parts of gas, by volume, exclusive of water or particulates.

**“Permit”** means a written warrant or license granted by the Board, Executive Director, or duly authorized Representative or Agent.

**“Permitting Agency”** means ecology or the local air pollution control agency with jurisdiction over the source.

**“Person”** means an individual, firm, public or private corporation, association, partnership, political subdivision, municipality, or government agency.

**“PM<sub>2.5</sub>”** means particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers as measured by a reference method based on 40 CFR Part 50 Appendix L and designated in accordance with 40 CFR Part 53 or by an equivalent method designated in accordance with 40 CFR Part 53.

**“PM<sub>10</sub>”** means particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by a reference method based on 40 CFR Part 50 Appendix J and designated in accordance with 40 CFR Part 53 or by an equivalent method designated in accordance with 40 CFR Part 53.

**“PM<sub>2.5</sub> Emissions”** means finely divided solid or liquid material, including condensable particulate matter, with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers emitted to the ambient air as measured by an applicable reference method, or an equivalent or alternate method, specified in Appendix M of 40 CFR Part 51 or by a test method specified in the SIP.

**“PM<sub>10</sub> Emissions”** means finely divided solid or liquid material, including condensable particulate matter, with an aerodynamic diameter less than or equal to a nominal 10 micrometers emitted to the ambient air as measured by an applicable reference method, or an equivalent or alternate method, specified in Appendix M of 40 CFR Part 51 or by a test method specified in the SIP.

**“Potential to Emit”** means the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the stationary source to emit a pollutant including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, will be treated as part of its design only if the limitation or the effect it would have on emissions is federally enforceable. Secondary emissions do not count in determining the potential to emit of a source.

**“Prevention of Significant Deterioration (PSD)”** means the program in WAC 173-400-700 to 173-400-750. Ecology is responsible for the PSD program for stationary sources in ORCAA’s jurisdiction.

**“Process”** means any equipment, device apparatus, chemical, natural element, procedure, effort, or any combination thereof which performs a service, function, use, or method, leading to an end of a performance, or manufacturing production.

**“Reasonably Available Control Technology (RACT)”** means the lowest emission limit that a particular stationary source or stationary source category is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility. RACT is determined on a case-by-case basis for an individual stationary source or stationary source category considering the impact of the stationary source upon air quality, the availability of additional controls, the emission reduction to be achieved by additional controls, the impact of additional controls on air quality, and the capital and operating costs of the additional controls. RACT requirements for any stationary source or stationary source category will be adopted only after notice and opportunity for comment are afforded.

**“Refuse”** means waste as defined in Rule 1.4 of this Regulation.

**“Regulation”** means any regulation, or any subsequently adopted additions or amendments thereto, of the Olympic Region Clean Air Agency.

**“Regulatory Order”** means an order issued by Ecology or an agency to an air contaminant source that applies to that source, any applicable provision of chapter 70A.15 RCW, or the rules adopted there under, or, for sources regulated by a local air agency, the regulations of that agency.

**“Representative”** or **“Agent”** means any person authorized by the Executive Director of the Agency to represent them in an official and specific manner.

**“Residential”** means a two or single-family unit.

**“Secondary Emissions”** means emissions which would occur because of the construction or operation of a major stationary source or major modification, but do not come from the major stationary source or major modification itself. Secondary emissions must be specific, well defined, quantifiable, and impact the same general area as the stationary source or modification that causes the secondary emissions. Secondary emissions may include, but are not limited to:

- (a) Emissions from ships or trains located at the new modified stationary source; and,
- (b) Emissions from any off-site support facility which would not otherwise be constructed or increase its emissions because of the construction or operation of the major stationary source or major modification.

**“Significant”** (a) as it applies to stationary sources subject to requirements for new sources in **nonattainment areas** means the same as it is defined in WAC 173-400-810; or,  
(b) as it applies to stationary sources subject to requirements for new sources in **attainment or unclassified areas** means the same as it is defined in WAC 173-400-710.

**“Source”** means all the emissions units, including quantifiable fugitive emissions, that are located on one or more contiguous or adjacent properties, and are under the control of the same person or persons under common control, whose activities are ancillary to the production of a single product or functionally related groups of products. Activities will be considered ancillary to the production of a single product or functionally related group of products if they belong to the same Major Group (i.e., which have the same two-digit code) as described in the Standard Industrial Classification Manual, 1972, as amended by the 1977 supplement.

**“Source Category”** means all sources of the same type of classification.

**“Stack”** means any point in a source designed to emit solids, liquids, or gases into the air, including a pipe or duct.

**“Stack Height”** means the height of an emission point measured from the ground-level elevation at the base of the stack.

**“Standard Conditions”** means a temperature of 20°C (68°F) and a pressure of 760 mm (29.92 inches) of mercury.

**“Standard Cubic Foot of Gas”** means that amount of the gas, which would occupy a cube having dimensions of one foot on each side if the gas were free of water vapor and at standard conditions.

**“State Implementation Plan (SIP)”** or the “Washington SIP” in 40 CFR Part 52, subpart WW. The SIP contains state, local and federal regulations and orders, the state plan and compliance schedules approved and promulgated by EPA, for implementing, maintaining, and enforcing the National Ambient Air Quality Standards.

**“Stationary Source”** means any building, structure, facility, or installation, which emits or may emit any air contaminant. This term does not include emissions resulting directly from an

internal combustion engine for transportation purposes or from a nonroad engine or nonroad vehicle as defined in section 216(11) of the Federal Clean Air Act.

**“Synthetic Minor”** means any stationary source that’s potential to emit has been limited below applicable thresholds by means of a federally enforceable order, rule, or permit condition.

**“Temporary”** means a period not to exceed one (1) year.

**“Total Reduced Sulfur (TRS)”** means the sum of the sulfur compounds hydrogen sulfide, mercaptans, dimethyl sulfide, dimethyl disulfide, and any other organic sulfides emitted and measured by EPA method 16 or an approved equivalent method and expressed as hydrogen sulfide.

**“Total Suspended Particulate (TSP)”** means particulate matter as measured by the method described in 40 CFR Part 50 Appendix B.

**“Toxic Air Pollutant (TAP)”** means any toxic air pollutant listed in WAC 173-460-150. The term toxic air pollutant may include particulate matter and volatile organic compounds if an individual substance or a group of substances within either of these classes is listed in WAC 173-460-150. The term toxic air pollutant does not include particulate matter and volatile organic compounds as generic classes or compounds.

**“True Vapor Pressure”** means the equilibrium partial pressure exerted by the stored organic compound at:

- (a) The annual average temperature of the organic compound as stored; or
- (b) At the local annual average temperature as reported by the National Weather Service if stored at ambient temperature.

**“Unclassifiable Area”** means an area that cannot be designated attainment or nonattainment based on the available information as meeting or not meeting the National Ambient Air Quality Standard for the criteria pollutant that is listed by EPA at 40 CFR part 81.

**“United States Environmental Protection Agency (USEPA)”** will be referred to as EPA.

**“Vent”** means any opening through which gaseous emissions are exhausted into the ambient air.

**“Volatile Organic Compound (VOC)”** means the same as it is defined in WAC 173-400-030. [Adopted 08/17/06; Amended 05/22/10; 03/18/11; 05/13/12; 02/26/22]

## **RULE 1.5 EXECUTIVE DIRECTOR – POWERS AND DUTIES**

- (a) The Executive Director shall observe and enforce the provisions of state law and all orders, ordinances, resolutions or rules and regulations of the Agency pertaining to control and prevention of air pollution in accordance with the policies of the Board of Directors.



- (b) At least thirty days prior to the commencement of any formal enforcement action under RCW 70A.15.3150 or 70A.15.3160, whenever the Executive Director has reason to believe that any provision of state law or any regulation relating to the control or prevention of air pollution has been violated, the Executive Director may cause written notice to be served upon the alleged violator or violators. The notice must specify the provision of state law or the regulation alleged to be violated and the facts alleged to constitute a violation thereof and may include an order that necessary corrective action be taken within a specified time. In lieu of an order, the Executive Director may require that the alleged violator or violators appear before the Board for a hearing, at a time and place specified in the notice, given at least twenty (20) days prior to such hearing, and answer the charges.
- (c) The Executive Director and/or a qualified designated agent may make any investigation or study which is necessary for enforcing these Regulations or any amendment thereto of controlling or reducing the amount or kind of air contaminant.
- (d) The Executive Director and/or a qualified designated agent may obtain from any person, subject to the jurisdiction of the Agency, such information or analysis as will disclose the nature, extent, quantity, or degree of air contaminants which are, or may be, discharged by such source and type or nature of control equipment in use.
- (e) To investigate conditions specific to the control, recovery, or release of air contaminants into the atmosphere, the Executive Director or a duly authorized representative has the power to enter at reasonable times upon any private or public property, excepting non-multiple unit private dwellings housing two families or less. No person may refuse entry or access to the Executive Director, or a duly authorized representative, who request entry for an inspection, and who presents appropriate credentials; nor obstruct, hamper, or interfere with any such inspection.
- (f) If during the course of an inspection, the Executive Director or a duly authorized representative desires to obtain a sample of air contaminant, fuel, or process material or other material which affects or may affect the emission of air contaminants, the Executive Director or a designated agent shall notify the owner or operator of the time and place of obtaining a sample so the owner or operator has the opportunity to take a similar sample at the same time and place; and the Executive Director or a duly authorized representative shall give a receipt to the owner or operator for the sample obtained.
- (g) The Executive Director may engage, at the Agency's expense and with Board approval, qualified individuals, or firms to make independent studies and reports as to the nature, extent, quantity, or degree of any air contaminants which are or may be discharged from any source.
- (h) The Executive Director is empowered to sign official complaints or issue citations or initiate court suits or use other means to enforce the provisions of the Regulations.
- (i) To demonstrate compliance with emission standards, the Executive Director has the authority to require a source to be tested, either by the Agency personnel or by the owner, using source test procedures approved by the Agency. The owner must be given reasonable advance notice of the requirement of the test.

- (j) For Agency personnel to perform a source test, the Executive Director has the authority to require the owner of the source to provide an appropriate platform and sampling ports. The owner must have the opportunity to observe the sampling and, if there is adequate space to conduct the tests safely and efficiently, to obtain sample at the same time.

[Adopted 08/17/06; Amended 02/26/22]

#### **RULE 1.6 CONFIDENTIAL INFORMATION**

Whenever any record or other information, other than ambient air quality data or emissions data, furnished to or obtained by the Agency, pursuant to any sections in chapter 70A.15 RCW, relate to processes or production unique to the owner or operator or are likely to affect adversely the competitive position of such owner or operator if released to the public or to the competitor, and the owner or operator of such processes or production so certifies, such records or information will only be for the confidential use of the Agency.

Nothing herein will be construed to prevent the use of records or information by the Agency in compiling or publishing analysis or summaries relating to the general condition of the outdoor atmosphere: Provided, that such analysis or summaries do not reveal any information otherwise confidential under the provisions of this rule: Provided further, that emission data furnished to or obtained by the Agency will be correlated with applicable emission limitations and other control measures and will be available for public inspection during normal business hours at offices of the Agency.

[Adopted 08/17/06; Amended 02/26/22]

#### **RULE 1.7 APPOINTMENT OF HEARING OFFICER**

- (a) In all instances where the Board is permitted or required to hold hearings under the provisions of chapter 70A.15 RCW, such hearings must be held before the Board; or the Board may appoint a hearing officer, who will be the Executive Director of the Agency or his/her designee to hold such hearings.
- (b) A duly appointed hearing officer has all the powers, rights and duties of the Board relating to the hearings.

[Adopted 08/17/06; Amended 02/26/22]

#### **RULE 1.8 APPEALS FROM BOARD ORDERS**

- (a) Any order issued by the Agency becomes final unless such order is appealed to the Hearings Board as provided in chapter 43.21B RCW. The sole basis for appeal of a fee assessed by the Executive Director or Board will be that the assessment contains an arithmetic or clerical error.
- (b) Any order issued by the Agency may be appealed to the Pollution Control Hearings Board if the appeal is filed with the Hearings Board and served on the Agency within thirty (30) days after receipt of the order in accordance with chapter 371-08 WAC. This is the exclusive means of appeal of such an order.
- (c) The Agency in its discretion may stay the effectiveness of an order during the pendency of such an appeal.
- (d) At any time during the pendency of such an appeal of such an order to the Pollution Control Hearings Board, the appellant or other affected parties may

apply to the Hearings Board pursuant to chapter 43.21B RCW and chapter 371-08 WAC for a stay of the order or the removal thereof.

[Adopted 08/17/06; Amended 02/26/22]

#### **RULE 1.9 SEVERABILITY**

If any phrase, clause, or rule of these Regulations is declared unconstitutional or invalid by any court of competent jurisdiction, it will be conclusively presumed that the Board of Directors would have enacted these Regulations without the phrase, clause, or rule so held unconstitutional or invalid; and the remainder of the Regulations will not be affected because of said part being held unconstitutional or invalid.

[Adopted 08/17/06; Amended 02/26/22]

#### **RULE 1.10 SERVICE OF NOTICE**

- (a) Service of any written notice required by ORCAA Regulations must be made on the owner(s) as follows:
  - (1) Either by mailing the notice in a prepaid envelope directed to the owner at the address listed on their application, order, registration certificate, or at the address where the equipment is located, by United States Certified Mail, return receipt requested; or
  - (2) By leaving the notice with the owner or if the owner is not an individual, with a member of the partnership or group concerned, or with an officer, registered agent or managing agent of the corporation.
- (b) Service of any written notice required by ORCAA Regulations must be made on the Agency, as follows:
  - (1) Either by mailing the notice in a prepaid envelope directly to the Agency at its office by United States Certified Mail, return receipt requested; or
  - (2) By leaving the notice at the Agency office with an employee of the Agency.

[Adopted 08/17/06; Amended 05/22/10; 02/26/22]

#### **RULE 1.11 FEDERAL REGULATION REFERENCE DATE**

Whenever federal regulations are referenced in ORCAA's rules, the effective date is July 1, 2023.

[Adopted 08/17/06; Amended 10/29/16; 10/16/17; 03/23/19; 01/04/2020; 11/22/2020; 10/17/2021; 02/26/2022; 10/31/2022; Amended 10/28/2023]

#### **RULE 1.12 STATE REGULATIONS REFERENCE DATE**

Whenever state regulations are referenced in ORCAA's rules, the effective date is July 1, 2023.

[Adopted 02/26/2022; Amended 10/31/2022; Amended 10/28/2023]

## **REGULATION 2 – ENFORCEMENT PROCEDURES AND PENALTIES**

### **RULE 2.1 VOLUNTARY COMPLIANCE**

Nothing in this Regulation prevents the Agency from making efforts to obtain voluntary compliance through warning, conference, or any other appropriate means.

[Adopted 08/17/06; Amended 02/26/22]

### **RULE 2.3 VARIANCES**

Any person who owns or is in control of any plant, building, structure, establishment, process, or equipment may apply to the Agency or the Board for a variance to exceed a specific maximum emission standard of these Regulations for a limited period, except for any federally enforceable standard, provided that a variance to state standard is also approved by the Department of Ecology. The application must be accompanied by such information and data as the Agency or Board requires. The Board may grant such variance but only after approval by the Department of Ecology and public hearing or due notice and in accordance with the provisions set forth in RCW 70A.15.2310, as now or hereafter amended. Any hearing held pursuant to this rule must be conducted in accordance with the rules of evidence as set forth in RCW 34.04.100, as now or hereafter amended. A variance will be charged fees per the Agency's Notice of Construction Fee Schedule.

[Adopted 08/17/06; Amended 04/26/15; 02/26/22]

### **RULE 2.4 NOTICES OF VIOLATIONS**

At least 30 days prior to the commencement of any formal enforcement action under RCW 70A.15.3150 or 70A.15.3160, the Board or Executive Director will serve written notice upon the alleged violator or violators. The notice must specify the provisions of chapter 70A.15 RCW or the orders, rules, or regulations adopted pursuant thereto, alleged to be violated, and the facts alleged to constitute a violation thereof, and may include an order directing that necessary corrective action be taken within a reasonable time. In lieu of an order, the Board or the Executive Director may require the alleged violator or violators appear before the Board for a hearing. Every notice of violation will offer the alleged violator an opportunity to meet with the Agency prior to the commencement of enforcement action.

- (a) Each act of commission or omission which procures, aids, or abets in the violation is a violation and is subject to the same penalty.
- (b) In case of a continuing violation, whether knowingly committed, each day's continuance is a separate and distinct violation.

[Adopted 08/17/06; Amended 02/26/22]

### **RULE 2.5 REGULATORY ACTIONS AND PENALTIES**

The Executive Director may take any of the following regulatory actions to enforce the provisions of chapter 70A.15 RCW or any of the rules or regulations in force pursuant thereto, which are incorporated by reference.

- (a) Civil Penalties

- (1) Any person who violates any of the provisions of chapter 70A.15 RCW or any of the rules or regulations in force pursuant thereto may incur a civil penalty in an amount not to exceed \$14,915.00 per day for each violation.
- (2) Any person who fails to act as specified by an Order issued pursuant to chapter 70A.15 RCW or Regulations of ORCAA is liable for a civil penalty of not more than \$14,915.00 for each day of continued noncompliance.
- (3) Within 30 days after receipt of Notice of Civil Penalty, the person incurring the penalty may apply in writing to the Executive Director for the remission or mitigation of the penalty. Any such request must contain the following:
  - (i) The name, mailing address, and telephone number of the appealing party;
  - (ii) A copy of the Notice of Civil Penalty appealed from;
  - (iii) A short and plain statement showing the grounds upon which the appealing party considers such Order to be unjust or unlawful;
  - (iv) A clear and concise statement of facts upon which the appealing party relies to sustain their grounds for appeal;
  - (v) The relief sought, including the specific nature and extent; and
  - (vi) A statement that the appealing party has read the notice of appeal and believes the contents to be true followed by the party's signature.

Upon receipt of the application, the Executive Director may remit or mitigate the penalty only upon a demonstration by the requestor of extraordinary circumstances such as the presence of information or factors not considered in setting the original penalty.

- (4) Any civil penalty may also be appealed to the Pollution Control Hearings Board pursuant to chapter 43.21B RCW and chapter 371-08 WAC if the appeal is filed with the Hearings Board and served on the Agency within 30 days after receipt by the person penalized of the notice imposing the penalty or 30 days after receipt of the notice of disposition of the application for relief from penalty.
- (5) A civil penalty becomes due and payable on the later of:
  - (i) 30 days after receipt of the notice imposing the penalty;
  - (ii) 30 days after receipt of the notice of disposition on application for the relief from penalty, if such application is made; or
  - (iii) 30 days after receipt of the notice of decision of the Hearings Board if the penalty is appealed.
- (6) If the amount of the civil penalty is not paid to the Agency within the time allowed, the Agency may use any available methods, including Superior Court, to recover the penalty. In all actions brought in the Superior Court for recovery of penalties hereunder, the procedure and rules of evidence are the same as in ordinary civil action.
- (7) To secure the penalty incurred under this rule, this Agency may secure a lien on any vessel used or operated in violation of these Regulations, which will be enforced as provided in RCW 60.36.050.

(b) Criminal Penalties

- (1) Any person who knowingly violates any of the provisions of chapter 70A.15 RCW or any rules or regulations in force pursuant thereto, is guilty of a crime and upon conviction thereof, may be punished by fine of not more than \$10,000.00, or by imprisonment in the county jail for not more than 1 year, or by both for each separate violation.
- (2) Any person who negligently releases into the ambient air any substance listed by the Department of Ecology as a hazardous air pollutant, other than in compliance with terms of an applicable permit or emission limit, and who at the time negligently places another person in imminent danger of death or substantial bodily harm is guilty of a crime and may, upon conviction, be punished by a fine of not more than \$10,000.00, or by imprisonment for not more than 1 year, or both.
- (3) Any person who knowingly releases into the ambient air any substance listed by the Department of Ecology as a hazardous air pollutant, other than in compliance with the terms of an applicable permit or emission limit, and who knows at the time that they have thereby placed another person in imminent danger of death or substantial bodily harm is guilty of a crime and may, upon conviction, be punished by a fine of not less than \$50,000.00, or by imprisonment for not more than 5 year, or both.

(c) Additional Enforcement

- (1) Notwithstanding the existence or use of any other remedy, whenever any person has engaged in, or is about to engage in, any acts or practices which constitute or will constitute a violation of any provision of chapter 70A.15 RCW, or any order, rule or regulation issued by the Board of Executive Director or a duly authorized agent, the Board, after notice to such person and an opportunity to comply, may petition the Superior Court of the county wherein the violation is alleged to be occurring or to have occurred for a restraining order or a temporary or permanent injunction or another appropriate order.
- (2) As an additional means of enforcement, the Board or Executive Director may accept an assurance of discontinuance of any act or practice deemed in violation of chapter 70A.15 RCW or of any order, rule, or regulation adopted pursuant thereto, from any person engaging in, or who has engaged in, such act or practice. Any such assurance must specify a time limit during which such discontinuance is to be accomplished. Failure to perform the terms of any such assurance constitutes prima facie proof of a violation of this chapter or the orders, rules or regulations issued pursuant thereto, which make the alleged act or practice unlawful for securing any injunction or other relief from Superior Court in the county wherein the violation is alleged to be occurring or to have occurred.

[Adopted 08/17/06; Amended 02/12/07; 02/26/22]

**RULE 2.6 COMPLIANCE SCHEDULES**

- (a) Issuance. Whenever a source is found to be in violation of an emission standard or other provision of ORCAA's Regulations or chapter 70A.15 RCW or title 173 WAC or any applicable federal regulation the Agency may issue a regulatory order requiring that the source be brought into compliance within a specified time. The order must contain a schedule for installation, with intermediate benchmark dates and a completion date, which constitutes a compliance schedule.
- (b) The source, including any person who owns or is in control of any plant, building, structure, establishment, process, or equipment, which is in violation of an emission standard or other provision of ORCAA's Regulations or chapter 70A.15 RCW or title 173 WAC may submit a proposed Compliance Schedule to the Board for approval. The proposed Compliance Schedule must meet the requirements of this rule and must be accompanied by such information and data as the Executive Director or the Board may require.
- (c) Public Noticing. Compliance Schedules must meet the requirements for public involvement in accordance with chapter 70A.15 RCW as now or hereafter amended. Any hearing held pursuant to this rule must be conducted in accordance with the Rules of Evidence as set forth in Chapter 34.04 RCW, as now or hereafter amended.
- (d) Federal Action. A source will be considered in compliance with this rule if all the provisions of its individual compliance schedule, including those stated by regulatory order, are being met. Such compliance does not preclude federal enforcement action by the EPA until and unless the schedule is submitted and adopted as an amendment to the State Implementation Plan.
- (e) Penalties for delayed compliance. Sources on a compliance schedule but not meeting emissions standards may be subject to penalties as provided in the Federal Clean Air Act. In addition, failure at any phase to make progress towards compliance pursuant to any Compliance Schedule accepted by the Board may be deemed an unreasonable delay and in violation of the terms of said Compliance Schedule and the Board or Executive Director may require that the responsible person appear before the Board to explain the delay and show cause why abatement action should not be started, enforcement action taken, and/or the Compliance Schedule revoked.
- (f) Fee for Compliance Schedule. The Agency will not commence processing a compliance schedule request until it has received a filing fee as determined by Rule 3.3.

[Adopted 08/17/06; Amended 02/26/22]

## REGULATION 3 – FEES

The Board will establish Fee Schedules by Resolution. The Fee Schedules will be reviewed periodically to determine if the fee revenue collected is sufficient to recover program costs. Any proposed fee revision must include opportunity for public review and comment. Accordingly, the Agency must account for program costs, including direct and indirect employee costs and overhead. If it is determined that the total program fee revenue is either significantly excessive or deficient for this purpose, the Board may choose to amend the fee schedules to recover program costs more accurately.

[Adopted 08/17/06; Amended 02/26/22]

### RULE 3.1 ANNUAL REGISTRATION FEES

- (a) The Agency will charge Initial and Annual registration fees pursuant to RCW 70A.15.2200. Annual registration fees will be assessed per the annual fee schedules set forth in Rule 3.1(b) below. Initial registration fees will be assessed upon initial registration of a source and will equal the annual registration fee based on projected emissions and prorated for the remaining months in the fiscal year. Initial and Annual registration fees provide revenue to fund the Agency's ongoing Registration Program.
- (b) All sources requiring registration will be assessed an annual registration fee; the fees required by this rule will be based on process rates, equipment specifications, and emissions data from the previous calendar year on file with the Agency, if this information is not on file with the Agency, the Agency may base the annual fee on the enforceable emissions limitations for the source and maximum capacities and production rates. In assessing annual registration fees, the Agency will consider updates and revisions to any source's file received prior to July 1 of the current year. The fees will be assessed per items (1) and (2) of this rule. Sources assessed annual operating permit fees under Rule 3.2 will not be assessed annual fees under this rule.
  - (1) An Emissions Fee as specified in the Registration Fee Schedule per ton of each air contaminant listed in Table 3.1 that is emitted by the source. The emissions fee will be based on actual emissions from the source, for the last calendar year when available, or as specified in the file or permit. Only non-VOC TAPs will be subject to the emission fee; and
  - (2) A Registration Classification Fee as specified in the Registration Fee Schedule.
- (c) The Agency sends annual registration invoices out on or after August 1 of each year to cover the cost of administering the program for the current fiscal year commencing July 1 and ending June 30. The agency assesses annual registration fees based on the most recent information on file with the Agency including any updates to the source's file received prior to July 1 of that year.
- (d) Upon assessment by the Agency, annual registration fees are due and payable and will be deemed delinquent if not fully paid on or before the due date on the invoice. However, sources classified as RC1, RC2, or RC3 have the option to pay their annual fee in quarterly installments. RC1, RC2, and RC3 sources choosing to pay quarterly installments may indicate so on the first invoice



- received and remit payment of the first installment to the Agency along with the duplicate copy of the invoice. Quarterly installments are equal to 25% of the total annual registration fee and are due on or before the due date on the invoice.
- (e) Any source which fails to pay, in full, their annual registration fee or annual registration installment by the due date, as stated on the invoice, may be assessed a late penalty in the amount of 25% of their annual registration fee. This late penalty is in addition to the annual registration fee.
  - (f) Annual registration fees may be appealed per the procedure specified in Rule 1.8.
  - (g) Failure to pay annual registration fees is a violation of these Regulations and will result in the issuance of a Notice of Violation and prescribed penalties.
  - (h) On a periodic basis, the Agency conducts a workload analysis to determine the adequacy of annual registration fees in funding the Agency's Registration Program. The workload analysis is based on the Agency's historical record of time and resource expenditures associated with the registration program. The workload analysis will be presented to the Board periodically. Any proposed revisions to the annual registration fee schedule must be presented to the Board for adoption after public noticing pursuant to these Regulations public noticing requirements and opportunity for a public hearing.
  - (i) All registered sources needing to be re-inspected, due to verified conditions or actions caused by the source, will be charged an additional amount as specified in the Registration Fee Schedule.
  - (j) The Agency's Registration fees must cover the direct and indirect cost of the Registration program as specified in RCW 70A.15.2200.
  - (k) The applicable fees are established in the current fee schedule adopted by Resolution of the Board of Directors of ORCAA.

**Table 3.1: Pollutants Considered For Fees**

|                                    |
|------------------------------------|
| Total Suspended Particulates (TSP) |
| Carbon Monoxide (CO)               |
| Sulfur Oxides (SO <sub>x</sub> )   |
| Nitrogen Oxides (NO <sub>x</sub> ) |
| Volatile Organic Compounds (VOC)   |
| Toxic Air Pollutants (TAP)         |

[Adopted 08/17/06; Amended 05/17/07; 05/13/12; 04/26/15; 02/26/22]

## **RULE 3.2 OPERATING PERMIT FEES**

- (a) **Fee Applicability.** Any source or area source in the Agency's jurisdiction subject to the requirement to obtain an Operating Permit pursuant to 40 CFR Part 70 or RCW 70A.15.2260 (Title V sources), except those Title V sources for which air emissions are regulated by the Washington State Department of Ecology or Energy Facility Site Evaluation Council (EFSEC), must pay annual fees to the Agency per the provisions in this rule.
- (b) **Operating Permit Program Account.** The Agency must maintain a dedicated account for the Air Operating Permit Program. The account will be funded exclusively by fee revenue from annual fees collected from Title V sources within the jurisdiction of the Agency. All fee revenue collected under Rule 3.2 must be deposited in the Air Operating Permit account.

- (c) Operating Permit Program Funding. The sum of fees assessed by the Agency under Rule 3.2 covers all direct and indirect costs of developing and administering the Agency's Operating Permit Program including Ecology's cost for development and oversight of the Agency's Operating Permit Program, as provided in RCW 70A.15.2270.
- (d) Ecology Development and Oversight Fees. The Agency assesses an annual Ecology Development and Oversight Fee to all Title V sources within the jurisdiction of the Agency. The total amount of Ecology Development and Oversight Fees assessed annually by the Agency equals Ecology's annual cost of development and oversight of the Agency's Operating Permit Program, as provided in RCW 70A.15.2270.
- (e) Annual Fees, Existing Title V Sources. The Agency assesses an Annual Fee to all existing Title V sources. The total amount of Annual Fees assessed by the Agency to existing Title V sources must equal the projected net annual cost to administer the Agency's Operating Permit Program during the current fiscal year.
- (f) Net Annual Cost Projections. Projected net annual cost to administer the Agency's Operating Permit Program will be determined annually and must equal the projected annual cost to administer the program minus any balance of funds in the Operating Permit Program account at the end of the previous fiscal year. Projected annual costs include all direct and indirect costs to administer the Agency's Operating Permit Program and is based on a workload analysis conducted by staff. Net annual cost projections including the workload analysis must be included in the Agency's annual budget and approved by resolution of the Agency's Board of Directors in a public hearing.
- (g) Workload Analysis. Only fee eligible activities as specified below, as provided in RCW 70A.15.2270, are considered in the workload analysis conducted annually by staff. Fee eligible activities will include:
  - (1) Preapplication assistance and review of an application and proposed compliance plan for a permit, permit revision, or permit renewal;
  - (2) Source inspections, testing, and other data gathering activities necessary for development of a permit, permit revision or renewal;
  - (3) Acting on an application for a permit, permit revision or renewal, including the cost of developing an applicable requirement as part of the processing of a permit, permit revision or renewal, preparing a draft permit and fact sheet, preparing a proposed permit, and preparing a final permit;
  - (4) Notifying and soliciting, reviewing, and responding to comment from the public and contiguous states and tribes, conducting public hearings regarding the issuance of a draft permit and other costs of providing information to the public regarding operating permits and the permit issuance process;
  - (5) Modeling necessary to establish permit limits or to determine compliance with the permit limits;
  - (6) Reviewing compliance certifications and emission reports, conducting related compilation and reporting activities;
  - (7) Conducting compliance inspections, complaint investigations and other activities necessary to ensure that a source is complying with permit conditions;

- (8) Administrative enforcement activities and penalty assessment, excluding the cost of proceedings before the Pollution Control Hearings Board (PCHB) and all costs of judicial enforcement;
  - (9) The share attributable to permitted sources to the development and maintenance of emissions inventories;
  - (10) The share attributable to permitted sources of the ambient air quality monitoring and associated recording and reporting activities;
  - (11) Training for permit administration and enforcement;
  - (12) Fee determination, assessment, and collection, including the cost of necessary administrative dispute resolution and enforcement;
  - (13) Required fiscal audits, periodic performance audits and reporting activities;
  - (14) Tracking of time, revenues and expenditures and accounting activities;
  - (15) Administering the permit program including costs of clerical support, supervision, and management;
  - (16) Provisions of assistance to small business under jurisdiction of the Agency as required under Section 507 of the Federal Clean Air Act; and,
  - (17) Other activities required by operating permit regulations issued by EPA under the Federal Clean Air Act.
- (h) Allocation of Fees. The Annual Fee for a Title V source will be calculated using the following three-part fee allocation equation:

**Table 3.2a: Operating Permit Fee Formulas**

| Annual Fee = Facility Fee + Equipment Fee + Emissions Fee                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>WHERE:</p> <p>Facility Fee = <math>(\text{Annual Net Cost} \div 3) \div n</math></p> <p>Equipment Fee = <math>[(\text{Annual Net Cost} \div 3) \div U_{\text{total}}] \times U_{\text{source}}</math></p> <p>Emissions Fee = <math>[(\text{Annual Net Cost} \div 3) \div E_{\text{total}}] \times E_{\text{source}}</math></p> <p>Annual Net Cost = Projected net annual cost as approved by the Agency's Board of Directors.</p> <p><math>n</math> = Total number of Title V sources in the Agency's jurisdiction. Note, each area source category requiring a Title V permit will be counted as one source in determining "n." However, the facility fee for an area source category will be divided equally among all individual area sources within the area source category.</p> <p><math>U_{\text{total}}</math> = Total number of emission units located at Title V sources in the Agency's jurisdiction.</p> <p><math>U_{\text{source}}</math> = Number of emission units at the specific Title V source. For area source categories requiring a Title V permit, "<math>U_{\text{source}}</math>" is the number of individual area sources within the area source category that have been identified within the Agency's jurisdiction. However, the emission unit fee for an area source category will be divided equally among all individual area sources within the area source category.</p> <p><math>E_{\text{total}}</math> = Total actual annual emissions of the air pollutants subject to fees from Title V sources based on the Agency's most recent emissions inventory.</p> <p><math>E_{\text{source}}</math> = Total actual annual emissions of the air pollutants subject to fees, from the specific Title V source for the most recent calendar year. For area source categories requiring a Title V permit, "<math>E_{\text{source}}</math>" is the total actual annual emissions from the area source category. However, the Emissions Fee for an area source category will be divided equally among all individual area sources within the area source category.</p> <p>Air pollutants subject to fees =<br/> Total Particulates (TSP)<br/> Sulfur Oxides (SOx)<br/> Nitrogen Oxides (NOx)<br/> Volatile Organic Compounds (VOC)<br/> Toxic Air Pollutants</p> |

- (i) Initial Fees. New Title V sources will be assessed an Initial Fee after commencement of operation to cover the Agency's cost of administering the program for the new Title V source for the remainder of the current fiscal year. The Initial Fee for a new Title V source will equal the Annual Fee based on Rule 3.2(h), which would otherwise be assessed if the Title V source commenced operation on or prior to the beginning of the current fiscal year, prorated by multiplying by the number of months remaining in the current fiscal year divided by 12.
- (j) Fee Assessment and Payment Schedule. The Agency sends Annual Fee invoices on or after August 1 of each year to cover the cost of administering the program for the current fiscal year commencing on July 1 and ending on June 30.

Annual Fees are due and payable and will be deemed delinquent if not fully paid on or before the due date on the invoice. However, option will be given to pay Annual Fees in quarterly installments. Owners or operators may choose to pay their Annual fees in quarterly installments by signing the invoice payment addendum received and remit it with payment of the first quarterly installment to the Agency on or before the due date on the invoice. After initial payment, the remaining installments must be received on or before October 1, January 1, and April 1. Quarterly installments are equal to twenty-five percent (25%) of the total fee.

- (k) Late Payment. Any Title V source which does not pay the Annual Fee or installment by the Invoice Due date will be assessed a late penalty equal to twenty-five percent (25%) of the balance due. Any penalty is in addition to the fee.
- (l) Appeal of Annual Fees. Annual Fees may be appealed per the procedure specified in Rule 1.8. The basis for such appeals is limited to arithmetic or clerical errors.
- (m) Exemption from Rule 3.1 fees. Title V sources assessed annual fees under Rule 3.2 are not subject to annual Registration Program Fees under Rule 3.1 of Regulation 3.
- (n) Transfer of Ownership. Transfer of ownership of a Title V source does not affect any obligation to pay fees required by Rule 3.2. Any liability for fee payment, including payment of delinquent fees and other penalties survives any transfer of ownership of a Title V source.
- (o) Accountability. The sum of the fees assessed by the Agency to all Title V sources within the Agency's jurisdiction will not exceed the cost of developing and administering the program. The Agency keeps record of all direct and indirect costs to develop and administer the Operating Permit Program as specified in 40 CFR Part 70. This information is used by the Agency in determining the net annual cost projections required by Rule 3.2(f) above. Provided, however, the information obtained from tracking revenues, time, and expenditures will not provide a basis for challenge to the amount of an individual source's fee.

[Adopted 08/17/06; Amended 04/26/15; 02/26/22]

### **RULE 3.3 NOTICE OF CONSTRUCTION FEES**

- (a) Fees for processing a Notice of Construction (NOC) application must include Filing Fees per Rule 3.3(b) and any applicable Additional NOC Processing Fees per Rule 3.3(c). Other cost to the agency of work performed outside of the agency in conjunction with approving an NOC application must be directly reimbursed to the agency per Rule 3.3(d).
- (b) Filing Fees. A Filing Fee per the Notice of Construction Fee Schedule must be paid for each proposed piece of equipment or process, or for groups of identical equipment or processes that, if considered individually would be subject to an NOC. Filing Fees will be assessed and paid as follows:
  - (1) An NOC application may not be deemed complete unless initial Filing Fees have been paid in full.

- (2) Equipment or processes may be considered identical and subject to a single filing fee provided:
  - (i) They are identical in size and capacity;
  - (ii) Employ identical air pollution control technology;
  - (iii) Use the same fuel types;
  - (iv) Are subject to the same performance standards and air regulatory determinations; and,
  - (v) May be considered as a single emission point for determining ambient air quality impacts.
- (3) Payment of NOC Filing Fees is due on or before the Invoice Due Date unless the Executive Director has approved an alternative payment plan.
- (c) **Additional NOC Processing Fees.** Additional NOC Processing Fees must be paid at a rate as specified in the Notice of Construction Fee Schedule for direct time expended by agency staff working on any of the items or actions described in Table 3.3. If required, additional NOC Processing Fees will be determined and paid as follows:
  - (1) Additional NOC Fees may be assessed periodically as work to complete the items in Table 3.3 incurs, but not more frequently than monthly.
  - (2) All Additional NOC Processing Fees must be assessed and paid prior to issuing any Final Determination on an NOC application unless the Executive Director has approved an alternative payment plan.
  - (3) Payment of any Additional NOC Processing Fee is due on or before the Invoice Due date unless the Executive Director has approved an alternative payment plan.
  - (4) The Executive Director may approve an alternative payment plan if a request is submitted in writing by the applicant.
  - (5) In computing fees based on hourly rates, only hours attributed directly to completing tasks listed in Table 3.3 will be used in computing fees.
  - (6) The total hours used in computing fees will be based on the agency's official time accounting records.
- (d) **Other Costs.** The following other costs must be borne by the applicant and paid prior to issuing any Final Determination on an NOC application unless an alternative payment plan has been approved by the Executive Director:
  - (1) The cost of publishing any required notice
  - (2) Consulting cost incurred by the agency in conjunction with approving an NOC application.
- (e) **Late Payment Penalties.** Failure to pay, in full, any assessed NOC fee on or before the due date as stated on the invoice, may incur a late payment penalty in the amount of 25% of the total amount due.
- (f) The Agency's NOC fees cover the direct and indirect cost of processing an NOC application and will be determined through a workload-driven process as allowed under RCW 70A.15.2210.

- (g) On a periodic basis, the Agency reviews the Notice of Construction Fee Schedule based on a workload-driven process and determines if the total actual fee revenue is sufficient to recover program costs as allowed in RCW 70A.15.2210. Any proposed fee revision must be Board approved and includes opportunity for public review and comment.
- (h) The Applicable fee(s) will be established in the current fee schedule adopted by Resolution of the Board of Directors of ORCAA.

**Table 3.3: Additional NOC Processing Fees**

| Fee-Eligible Item                     | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NOC Application Assistance            | Direct technical assistance completing an NOC application, including, but not limited to calculating emissions, filling out standard forms, determining applicable requirements, completing a BACT analysis, performing an air toxics screening analysis pursuant to chapter 173-460 WAC, or selecting monitoring equipment. An NOC Application Assistance fee may only be assessed if the fee rate is disclosed to the applicant and applicant requests such assistance in writing. |
| Work Exceeding Base-Fee Hours         | Direct work attributed to processing an NOC application more than the sum of applicable base-fee hours stated in the Notice of construction Fee Schedule for each piece of equipment or process subject to an NOC.                                                                                                                                                                                                                                                                   |
| State Environmental Policy Act (SEPA) | SEPA-related work such as reviewing Environmental Checklists, making threshold determinations, preparing Determinations of Nonsignificance (DNS) and other SEPA-related reports.                                                                                                                                                                                                                                                                                                     |
| Public Noticing                       | Work directly associated with issuing public notice pursuant to WAC 173-400-171 and Rule 6.1.3 of ORCAA's Regulations. Associated work includes issuing a press release if warranted, copying, and posting the written Preliminary Determination for public viewing, and reviewing and responding to comments.                                                                                                                                                                       |
| Public Hearing                        | Work associated with conducting a public hearing including, but not limited to, preparation of summary materials, copying, issuing hearing notice, conducting the hearing, and responding to comments                                                                                                                                                                                                                                                                                |

[Adopted 08/17/06; Amended 05/17/07; 04/26/15; 02/26/22]

### **RULE 3.4 OUTDOOR BURNING PERMIT FEES**

The applicable fee(s) for the following Permits will be established in the current fee schedule adopted by Resolution of the Board of Directors of ORCAA.

- (a) The fee for an Agricultural Burn Permit is specified in the Outdoor Burning Fee Schedule.
- (b) The fee for a Land Clearing Burn Permit is specified in the Outdoor Burning Fee Schedule. The fees must cover the direct and indirect cost of the Land Clearing Burn Permit program and will be determined through a workload-driven process.

[Adopted 08/17/06; Amended 02/12/07; 05/10/08; 04/26/15; 10/11/15; 02/26/22]

### **RULE 3.5 ASBESTOS FEES**

The applicable fee(s) for Asbestos and Demolition Notifications will be established in the current fee schedule adopted by Resolution of the Board of Directors of ORCAA.

The fees must cover the direct and indirect cost of the asbestos program and will be determined through a workload-driven process.

[Adopted 08/17/06; Amended 09/19/08; 04/26/15; 01/15/17; 02/26/22]

### **RULE 3.6 NOTICE OF INTENT TO OPERATE FEES**

- (a) The submittal of a Notice of Intent to Operate (NOI) must be accompanied by the appropriate fees as specified in the Notice of Intent Fee Schedule.
- (b) The applicable fee(s) will be established in the current fee schedule adopted by Resolution of the Board of Directors of ORCAA.
- (c) The Agency's fees must cover the direct and indirect costs of the NOI application process and will be determined through a workload-driven process.

[Adopted 08/17/06; Amended 04/26/15; 02/26/22]





## REGULATION 4 – REGISTRATION

### RULE 4.1 REGISTRATION REQUIRED

- (a) All stationary sources within the jurisdiction of the Agency, except for any stationary sources required to obtain an air operating permit under chapter 173-401 WAC, must be registered with the Agency. Notwithstanding the exemptions provided in Rule 4.1(b), the following stationary sources must be registered with the Agency:
  - (1) Any stationary source subject to a standard under New Source Performance Standards, 40 CFR Part 60, except; New Residential Wood Heaters (Subpart AAA); Kraft Pulp Mills (Subpart BB); and Primary Aluminum Reduction Plants (Subpart S);
  - (2) Any stationary source subject to a performance standard under National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 61, except for asbestos demolition and renovation projects subject to 40 CFR Part 61 Subpart M;
  - (3) Any stationary source subject to a performance standard under National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR Part 63;
  - (4) Any stationary source that includes equipment or control equipment subject to an Approval Order issued by the Agency.
- (b) The following stationary sources are exempt from registration requirements under Regulation 4. All stationary sources exempt from registration under Regulation 4 are still required to comply with other applicable air pollution requirements.

#### Maintenance/construction:

- (1) Cleaning and sweeping of streets and paved surfaces;
- (2) Concrete application, and installation;
- (3) Dredging wet spoils handling and placement;
- (4) Paving application and maintenance, excluding asphalt plants;
- (5) Plant maintenance and upkeep activities (grounds keeping, general repairs, routine housekeeping, routine plant painting, welding, cutting, brazing, soldering, plumbing, retarring roofs, etc.);
- (6) Plumbing installation and plumbing protective coating application associated with plant maintenance activities;
- (7) Roofing application;
- (8) Insulation application and maintenance, excluding products for resale;
- (9) Janitorial services and consumer use of janitorial products;
- (10) Asphalt laying equipment including asphalt-roofing operations (not including manufacturing or storage);
- (11) Blast cleaning equipment that uses a suspension of abrasives in liquid water;
- (12) Spray painting or blasting equipment used at temporary locations to clean or paint bridges, water towers, buildings, or similar structures.

Storage tanks:

- (13) Lubricating oil storage tanks except those facilities that are wholesale or retail distributors of lubricating oils;
- (14) Polymer tanks and storage devices and associated pumping and handling equipment, used for solids dewatering and flocculation;
- (15) Storage tanks, reservoirs, pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions;
- (16) Process and white-water storage tanks;
- (17) Storage tanks and storage vessels, with lids or other appropriate closure and less than 260-gallon capacity (35 cu ft);
- (18) Storage tanks of a capacity of 10,000 gallons or less, with lids or other appropriate closure, used for the storage of materials containing organic compounds, but not for use with materials containing toxic air pollutants (as defined in chapter 173-460 WAC);
- (19) Storage tanks of a capacity of 40,000 gallons or less, with lids or other appropriate closure, used for storage of organic compounds, but not for use with materials containing toxic air pollutants (as defined in chapter 173-460 WAC), with a true vapor pressure less than 0.01 kPa (0.002 psia) (0.0001 atm);
- (20) Storage tanks of a capacity of 40,000 gallons or less used for the storage of butane, propane, or liquefied petroleum gas;
- (21) Tanks, vessels, and pumping equipment, with lids or other appropriate closure for storage or dispensing of aqueous solutions of inorganic salts, bases, and acids;
- (22) Storage tanks used exclusively for storage of diesel fuel;
- (23) Loading and unloading equipment used exclusively for the storage tanks exempted under this rule.

Combustion:

- (24) Fuel burning equipment (not including incinerators) that:
  - (i) is used solely for a private dwelling serving five families or less; or
  - (ii) has a maximum heat input rate of 5 MMBtu/hr or less if burning natural gas, propane, or LPG; or
  - (iii) has a maximum heat input rate of 0.5 MMBtu/hr or less if burning waste-derived fuels; or
  - (iv) has a maximum heat input rate of 1 MMBtu/hr or less if burning recycled or used oil per the requirements of RCW 70A.15.4510; or
  - (v) has a maximum heat input rate of 1 MMBtu/hr or less if burning any other type of fuel and with less than or equal to 0.05% sulfur by weight.
- (25) All stationary gas turbines with a rated heat input less than 10 million Btu per hour.
- (26) Stationary internal combustion engines having rated capacity:
  - (i) less than 50 horsepower output; or

- (ii) less than 500 horsepower and used only for standby emergency power generation.
  - (27) Nonroad engines.
- Material handling:
- (28) Storage and handling of water-based lubricants for metal working where organic content of the lubricant is less than 10%;
  - (29) Equipment used exclusively to pump, load, unload, or store high boiling point organic material in tanks less than one million gallons, material with initial atmospheric boiling point not less than 150°C or vapor pressure not more than 5 mm Hg @21°C, with lids or other appropriate closure.

Water treatment:

- (30) Septic sewer systems, not including active wastewater treatment facilities;
- (31) NPDES permitted ponds and lagoons used solely for settling suspended solids and skimming of oil and grease;
- (32) De-aeration (oxygen scavenging) of water where toxic air pollutants as defined in chapter 173-460 WAC are not emitted;
- (33) Process water filtration system and demineralizer vents;
- (34) Sewer manholes, junction boxes, sumps and lift stations associated with wastewater treatment systems;
- (35) Demineralizer tanks;
- (36) Alum tanks;
- (37) Clean water condensate tanks;
- (38) Oil/water separators, except those at petroleum refineries;
- (39) Equipment used exclusively to generate ozone and associated ozone destruction equipment for the treatment of cooling tower water or for water treatment processes;
- (40) Municipal sewer systems, including wastewater treatment plants and lagoons with a design capacity of one million gallons per day or less, if they do not use anaerobic digesters, chlorine disinfections or sewer sludge incinerators.

Environmental chambers and laboratory equipment:

- (41) Environmental chambers and humidity chambers not using toxic air pollutant gases, as regulated under chapter 173-460 WAC;
- (42) Gas cabinets using only gases that are not toxic air pollutants regulated under chapter 173-460 WAC;
- (43) Laboratory fume hoods;
- (44) Laboratory calibration and maintenance equipment.

Monitoring/quality assurance/testing:

- (45) Equipment and instrumentation used for quality control/assurance or inspection purpose;
- (46) Hydraulic and hydrostatic testing equipment;
- (47) Sample gathering, preparation and management;
- (48) Vents from continuous emission monitors and other analyzers.

Miscellaneous:

- (49) Single-family residences and duplexes;
- (50) Plastic pipe welding;
- (51) Primary agricultural production activities including soil preparation, planting, fertilizing, weed and pest control, and harvesting;
- (52) Insecticide, pesticide, or fertilizer spray equipment;
- (53) Comfort air conditioning;
- (54) Flares used to indicate danger to the public;
- (55) Natural and forced air vents and stacks for bathroom/toilet activities;
- (56) Personal care activities including establishments like beauty salons, beauty schools, and hair cutting establishments;
- (57) Recreational fireplaces including the use of barbecues, campfires, and ceremonial fires;
- (58) Tobacco smoking rooms and areas;
- (59) Noncommercial smokehouses;
- (60) Blacksmith forges for single forges;
- (61) Vehicle maintenance activities, not including vehicle surface coating;
- (62) Vehicle or equipment washing;
- (63) Wax application;
- (64) Oxygen, nitrogen, or rare gas extraction and liquefaction equipment not including internal and external combustion equipment;
- (65) Ozone generators and ozonation equipment;
- (66) Ultraviolet curing processes, to the extent that toxic air pollutant gases as defined in chapter 173-460 WAC are not emitted;
- (67) Electrical circuit breakers, transformers, or switching equipment installation or operation;
- (68) Pneumatically operated equipment, including tools and hand-held applicator equipment for hot melt adhesives;
- (69) Firefighting and similar safety equipment and equipment used to train fire fighters;
- (70) Production of foundry sand molds, unheated and using binders less than 0.25% free phenol by sand weight;
- (71) Natural gas pressure regulator vents, excluding venting at oil and gas production facilities and transportation marketing facilities;
- (72) Solvent cleaners less than 10 square feet air-vapor interface with solvent vapor pressure not more than 30 mm HG @21°C, and not containing toxic air pollutants (as defined in chapter 173-460 WAC);
- (73) Surface coating, aqueous solution or suspension containing less than 1% (by weight) VOCs, and/or toxic air pollutants as defined in chapter 173-460 WAC;
- (74) Cleaning and stripping activities and equipment using solutions having less than 1% VOCs (by weight); on metallic substances, acid solutions are not exempt;
- (75) Dip coating operations, using materials less than 1% VOCs (by weight) and/or toxic air pollutants as defined in chapter 173-460 WAC;
- (76) Laundry dryers, extractors or tumblers used exclusively for the removal of water from fabric;
- (77) Residential composting facilities;
- (78) Restaurants and other retail food preparing establishments;

- (79) Routing, turning, carving, cutting, and drilling equipment used for metal, wood, plastics, rubber, leather, or ceramics;
- (80) Steam cleaning equipment used exclusively for office or residential housekeeping;
- (81) Vacuum cleaning systems used exclusively for office or residential housekeeping;
- (82) Vacuum producing devices used in laboratory operations and vacuum producing devices that do not remove or convey air contaminants from or to another source;
- (83) Vents used exclusively for:
  - (i) Sanitary or storm drainage systems; or
  - (ii) Safety valves.
- (84) Washing or drying equipment used for products fabricated from metal or glass, if no volatile organic material is used in the process;
- (85) Welding, brazing or soldering equipment;
- (86) Coffee roaster with a design capacity less than 10 pounds per batch;
- (87) Bark and soil screening operations;
- (88) Portable sand and gravel plants and crushed stone plants with a cumulative rated capacity of all crushers less than or equal to 150 tons per hour;
- (89) Fixed sand and gravel plants and crushed stone plants with a cumulative rated capacity of all crushers less than or equal to 25 tons per hour;
- (90) Any portable stationary source approved by the Agency for temporary operation at a single location.

[Adopted 08/17/06; Amended 02/26/22]

## **RULE 4.2 REGISTRATION PROGRAM**

- (a) Program purpose. As authorized by RCW 70A.15.2200, the Agency's registration program is a program to develop and maintain a current and accurate record of stationary sources. Information collected through the registration program is used to evaluate the effectiveness of air pollution control strategies and to verify stationary source compliance with applicable air pollution requirements.
- (b) Program components. The components of the Agency's registration program include:
  - (1) Initial notification and annual or other periodic reports from owners of stationary sources providing the information described in Rule 4.3.
  - (2) On-site inspections necessary to verify compliance with applicable air pollution control requirements and/or to supplement information provided by owners of stationary sources pursuant to the requirements of Rule 4.3.
  - (3) Maintenance of computers and software used to compile and retrieve information provided by owners of stationary sources relating to air contaminant emissions and compliance with air pollution control requirements.

- (4) Compilation of emission inventory reports and computation of emission reduction credits from information provided by owners of stationary sources pursuant to the requirements of Rule 4.3.
- (5) Staff review, including engineering analysis for accuracy and correctness, of information provided by owners of stationary sources pursuant to the requirements of Rule 4.3.
- (6) Clerical and other office support provided by the Agency in direct support of the registration program.
- (7) Administrative support provided in directly carrying out the registration program.
- (8) Assessment and collection of annual registration fees from all stationary sources requiring registration in accordance with Rule 3.1.

[Adopted 08/17/06; Amended 02/26/22]

#### **RULE 4.3 REQUIREMENTS FOR STATIONARY SOURCES SUBJECT TO REGISTRATION**

- (a) The owner or operator of any stationary source subject to registration under Rule 4.1 must register the stationary source by submitting an initial notification to the Agency of its existence within 30 days from:
  - (1) Commencement of operation of any new or recommissioned stationary source including those sources subject to prior approval by the Agency through a Notice of Construction under Rule 6.1; or,
  - (2) Change in ownership of an existing registered stationary source.
- (b) Initial notification must include the following information:
  - (1) Owner name, address, and phone number;
  - (2) Source location;
  - (3) Name, address, and phone number of on-site contact person;
  - (4) Identification and brief description in terms of type, location and size or capacity, of each stationary source subject to registration;
  - (5) Date each stationary source was constructed, installed, or established;
  - (6) Date each stationary source commenced operation;
  - (7) If subject to pre-construction review and approval by the Agency, the date of the approval and Notice of Construction application number.
- (c) Owners or operators of any stationary source subject to registration must, upon request by the Agency, make annual and/or periodic reports to the Agency regarding emission sources, types and amounts of raw materials and fuels used, types, amounts and concentrations of air contaminants emitted, data on emissions units and control devices, data on emission points, and any other information directly related to the registration program as requested by the Agency.
- (d) Annual and periodic reports as required by the Agency pursuant to Rule 4.3(c) must be made by the owner or lessee of the stationary source, or an agent, on forms provided by the Agency or in an Agency approved format. The owner of the stationary source is responsible for completion and submittal of the annual or periodic report within thirty (30) days of receipt of the request and forms provided

by the Agency. The owner of the stationary source is responsible for the completeness and correctness of the information submitted.

- (e) The owner or operator must notify the Agency of any changes in the following administrative information within 30 days from the change taking place:
- (1) Owner name, address, and phone number;
  - (2) Name, address, and phone number of on-site contact person;
  - (3) Process or equipment changes resulting in an increase in emissions. Changes requiring prior approval by the Agency through a Notice of Construction (NOC) or requiring submittal of a Notice of Intent to Operate (NOI) application must also comply with the requirements of Rule 6.1 and 6.4 respectively; and,
  - (4) Any permanent shut down or decommissioning of a stationary source.
- (f) Each notification or report required under this rule must be signed by the owner or operator of the stationary source, or by the agent appointed by the owner.
- (g) The Agency may require the owner or operator of a stationary source develop and implement an Operations and Maintenance (O&M) plan to assure compliance with the applicable air regulations and standards. When required, a copy of the plan must be retained at the facility where the stationary source is located and must be available to the Agency for inspection.
- (h) Owners or operators of stationary sources subject to registration will be classified per Rule 4.4 and must pay annual registration fees pursuant to Rule 3.1.

[Adopted 08/17/06; Amended 02/26/22]

#### **RULE 4.4 CLASSIFICATION OF SOURCES REQUIRED TO REGISTER WITH AGENCY**

All sources requiring registration pursuant to Rule 4.1 will be classified in one of the registration classifications listed in Table 4.4b. A source will be placed in the most appropriate classification as determined by the Agency. To determine classification, the pollutants listed in Table 4.4a will be considered.

**Table 4.4a: Pollutants**

|                                    |
|------------------------------------|
| Total Suspended Particulates (TSP) |
| Sulfur Oxides (SO <sub>x</sub> )   |
| Nitrogen Oxides (NO <sub>x</sub> ) |
| Volatile Organic Compounds (VOC)   |
| Carbon Monoxide (CO)               |
| Toxic Air Pollutants (TAP)         |

**Table 4.4b: Registration Classification (RC)**

|                                                                                                                 |
|-----------------------------------------------------------------------------------------------------------------|
| CLASSIFICATION RC1 - Any source that has an effective Synthetic Minor Order issued pursuant to WAC 173-400-091. |
|-----------------------------------------------------------------------------------------------------------------|

|                                                                                   |
|-----------------------------------------------------------------------------------|
| CLASSIFICATION RC2 - Any source with a potential to emit 30 tons or more per year |
|-----------------------------------------------------------------------------------|



of any combination of pollutants listed in Table 4.4a.

CLASSIFICATION RC3 - Any source with a potential to emit 10 tons or more per year of any combination of pollutants listed in Table 4.4a.

CLASSIFICATION RC4 - Any source, with a potential to emit 5 tons or more per year of any combination of pollutants listed in Table 4.4a.

CLASSIFICATION RC5 - Any source with a potential to emit less than 5 tons per year of any combination of pollutants listed in Table 4.4a.

[Adopted 08/17/06; Amended 05/13/12; 02/26/22]

## **REGULATION 5 – OPERATING PERMIT PROGRAM**

### **RULE 5.1 OPERATING PERMIT PROGRAM**

- (a) Purpose. The purpose of this rule is to provide for a comprehensive operating permit program consistent with the requirements of Title V of the Federal Clean Air Act Amendments of 1990 and its implementing regulation 40 CFR Part 70, and RCW 70A.15.2260 and its implementing regulation chapter 173-401 WAC.
- (b) Commitment to administer the program. The Agency, provided full or partial delegation by the US Environmental Protection Agency (EPA) and the Washington Department of Ecology (ECY), will administer an air operating permit program for the Agency's jurisdiction in accordance with Title V of the Federal Clean Air Act Amendments of 1990 and its implementing regulation 40 CFR Part 70, and RCW 70A.15.2260 and its implementing regulation chapter 173-401 WAC.
- (c) Applicability. The provisions of this rule apply to all sources subject to the requirements of chapter 173-401 WAC.
- (d) Compliance. It is unlawful for any person to cause or allow the operation of any source subject to the requirements of chapter 173-401 WAC without complying with the provisions of chapter 173-401 WAC and any permit issued under its authority.

[Adopted 08/17/06; Amended 02/26/22]

### **RULE 5.2 (RESERVED)**

### **RULE 5.3 RESTRICTING THE POTENTIAL TO EMIT**

A service-based fee, in addition to annual registration or operating permit fees, will be assessed to those sources applying to the Agency for approval of enforceable conditions that restrict the sources' potential to emit, making the source a minor source and not subject to an operating permit. Fees for restricting a sources' potential to emit will be assessed per Regulation 3, Rule 3.3. The Agency assesses the fee based on only those emissions units affected by the enforceable condition as proposed by the applicant.

[Adopted 08/17/06; Amended 02/26/22]



## REGULATION 6 – REQUIRED PERMITS AND NOTIFICATIONS

### RULE 6.1 NOTICE OF CONSTRUCTION REQUIRED

- (a) Approval of a Notice of Construction (NOC) Application required. It is unlawful for any person to cause or allow the following actions unless a Notice of Construction application has been filed with and approved by the Agency, except for those actions involving stationary sources excluded under Rule 6.1(b) and (c):
  - (1) Construction, installation, or establishment of any stationary source;
  - (2) Modification to any existing stationary source; or,
  - (3) Replacement or substantial alteration of emission control technology installed on an existing stationary source.
- (b) Exemption provided Notice of Intent to Operate (NOI). An NOC application and approval by the Agency is not required prior to construction, installation, establishment, or modification of the stationary sources listed in Rule 6.4 if a complete Notice of Intent to Operate is filed with the Agency per that section.
- (c) Categorical Exemptions. An NOC application and prior approval by the Agency is not required prior to construction, installation, establishment, or modification of stationary sources in the following stationary source categories, if sufficient records are kept documenting the exemption:

#### Maintenance/construction:

- (1) Cleaning and sweeping of streets and paved surfaces;
- (2) Concrete application, and installation;
- (3) Dredging wet spoils handling and placement;
- (4) Paving application and maintenance, excluding asphalt plants;
- (5) Plant maintenance and upkeep activities (grounds keeping, general repairs, routine housekeeping, routine plant painting, welding, cutting, brazing, soldering, plumbing, retarring roofs, etc.);
- (6) Plumbing installation and plumbing protective coating application associated with plant maintenance activities;
- (7) Roofing application;
- (8) Insulation application and maintenance, excluding products for resale;
- (9) Janitorial services and consumer use of janitorial products;
- (10) Asphalt laying equipment including asphalt-roofing operations (not including manufacturing or storage);
- (11) Blast cleaning equipment that uses a suspension of abrasive in liquid water;
- (12) Spray painting or blasting equipment used at temporary locations to clean or paint bridges, water towers, buildings, or similar structures.

#### Storage Tanks:

- (13) Lubricating oil storage tanks except those facilities that are wholesale or retail distributors of lubricating oils;
- (14) Polymer tanks and storage devices and associated pumping and handling equipment, used for solids dewatering and flocculation;

- (15) Storage tanks, reservoirs, pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions;
- (16) Process and white-water storage tanks;
- (17) Storage tanks and storage vessels, with lids or other appropriate closure and less than 260-gallon capacity (35 cu ft);
- (18) Gasoline storage tanks less than 2,000 gallons storage capacity;
- (19) Gasoline dispensing facilities with a cumulative gasoline storage capacity of less than 10,000 gallons;
- (20) Storage tanks of a capacity of 10,000 gallons or less, with lids or other appropriate closure, and for the storage of materials containing organic compounds, but not for use with materials containing toxic air pollutants (as defined in chapter 173-460 WAC);
- (21) Storage tanks of a capacity of 40,000 gallons or less, with lids or other appropriate closure, used for the storage of organic compounds, but not for use with materials containing toxic air pollutants (as defined in chapter 173-460 WAC), with a true vapor pressure less than 0.01 kPa (0.002 psia) (0.0001 atm);
- (22) Storage tanks of a capacity of 40,000 gallons or less used for the storage of butane, propane, or liquefied petroleum gas;
- (23) Tanks, vessels, and pumping equipment, with lids or other appropriate closure for storage or dispensing of aqueous solutions of inorganic salts, bases, and acids.
- (24) Storage tanks used exclusively for storage of diesel fuel;
- (25) Loading and unloading equipment used exclusively for the storage tanks exempted under this rule.

Combustion:

- (26) Fuel burning equipment (not including incinerators) that:
  - (i) is used solely for a private dwelling serving five families or less; or
  - (ii) has a maximum heat input rate of 5 MMBtu/hr or less if burning natural gas, propane, or LPG; or
  - (iii) has a maximum heat input rate of 0.5 MMBtu/hr or less if burning waste-derived fuels; or
  - (iv) has a maximum heat input rate of 1 MMBtu/hr or less if burning recycled or used oil per the requirements of RCW 70A.15.4510; or
  - (v) has a maximum heat input rate of 1 MMBtu/hr or less if burning any other type of fuel and with less than or equal to 0.05% sulfur by weight.
- (27) All stationary gas turbines with a rated heat input less than 10 million Btu per hour.
- (28) Stationary internal combustion engines having rated capacity:
  - (i) less than 50 horsepower output; or
  - (ii) less than 500 horsepower and used only for standby emergency power generation.

**(29)** Nonroad engines.

Material handling:

- (30)** Storage and handling of water-based lubricants for metal working where organic content of the lubricant is less than 10%;
- (31)** Equipment used exclusively to pump, load, unload, or store high boiling point organic material in tanks less than one million gallons, material with initial atmospheric boiling point not less than 150°C or vapor pressure not more than 5 mm Hg @ 21°C, with lids or other appropriate closure.

Water treatment:

- (32)** Septic sewer systems, not including active wastewater treatment facilities;
- (33)** NPDES permitted ponds and lagoons used solely for settling and suspended solids and skimming of oil and grease;
- (34)** De-aeration (oxygen scavenging) of water where toxic air pollutants as defined in chapter 173-460 WAC are not emitted;
- (35)** Process water filtration system and demineralizer vents;
- (36)** Sewer manholes, junction boxes, sumps and lift stations associated with wastewater treatment systems (does not include engines);
- (37)** Demineralizer tanks;
- (38)** Alum tanks;
- (39)** Clean water condensate tanks;
- (40)** Oil/water separators, except those at petroleum refineries;
- (41)** Equipment used exclusively to generate ozone and associated ozone destruction equipment for the treatment of cooling tower water or for water treatment processes.
- (42)** Municipal sewer systems, including wastewater treatment plants and lagoons with a design capacity of one million gallons per day or less.

Environmental chambers and laboratory equipment:

- (43)** Environmental chambers and humidity chambers not using toxic air pollutant gases, as regulated under chapter 173-460 WAC;
- (44)** Gas cabinets using only gases that are not toxic air pollutants regulated under chapter 173-460 WAC;
- (45)** Installation or modification of a single laboratory fume hood;
- (46)** Laboratory calibration and maintenance equipment.

Monitoring/quality assurance/testing:

- (47)** Equipment and instrumentation used for quality control/assurance or inspection purposes;
- (48)** Hydraulic and hydrostatic testing equipment;
- (49)** Sample gathering, preparation and management;
- (50)** Vents from continuous emission monitors and other analyzers.

Miscellaneous:

- (51)** Single-family residences and duplexes;
- (52)** Plastic pipe welding;
- (53)** Primary agricultural production activities including soil preparation, planting, fertilizing, weed and pest control, and harvesting;

- (54) Insecticide, pesticide, or fertilizer spray equipment;
- (55) Comfort air conditioning;
- (56) Flares used to indicate danger to the public;
- (57) Natural and forced air vents and stacks for bathroom/toilet activities;
- (58) Personal care activities including establishments like beauty salons, beauty schools, and hair cutting establishments;
- (59) Recreational fireplaces including the use of barbecues, campfires, and ceremonial fires;
- (60) Tobacco smoking rooms and areas;
- (61) Noncommercial smokehouses;
- (62) Blacksmith forges for single forges;
- (63) Vehicle maintenance activities, not including vehicle surface coating;
- (64) Vehicle or equipment washing;
- (65) Wax application;
- (66) Oxygen, nitrogen, or rare gas extraction and liquefaction equipment not including internal and external combustion equipment;
- (67) Ozone generators and ozonation equipment;
- (68) Ultraviolet curing processes, to the extent that toxic air pollutant gases as defined in chapter 173-460 WAC are not emitted;
- (69) Electrical circuit breakers, transformers, or switching equipment installation or operation;
- (70) Pneumatically operated equipment, including tools and hand-held applicator equipment for hot melt adhesives;
- (71) Fire fighting and similar safety equipment and equipment used to train fire fighters;
- (72) Production of foundry sand molds, unheated and using binders less than 0.25% free phenol by sand weight;
- (73) Natural gas pressure regulator vents, excluding venting at oil and gas production facilities and transportation marketing facilities;
- (74) Solvent cleaners less than 10 square feet air-vapor interface with solvent vapor pressure not more than 30 mm Hg @21°C, and not containing toxic air pollutants (as defined in chapter 173-460 WAC);
- (75) Surface coating, aqueous solution or suspension containing less than 1% (by weight) VOCs, and/or toxic air pollutants as defined in chapter 173-460 WAC;
- (76) Cleaning and stripping activities and equipment using solutions having less than 1% VOCs (by weight); on metallic substances, acid solutions are not exempt;
- (77) Dip coating operations, using materials less than 1% VOCs (by weight) and/or toxic air pollutants as defined in chapter 173-460 WAC.
- (78) Laundry dryers, extractors or tumblers used exclusively for the removal of water from fabric;
- (79) Residential composting facilities;
- (80) Restaurants and other retail food preparing establishments;
- (81) Routing, turning, carving, cutting, and drilling equipment used for metal, wood, plastics, rubber, leather. or ceramics;
- (82) Steam cleaning equipment used exclusively for that purpose;
- (83) Vacuum cleaning systems used exclusively for office or residential housekeeping;

- (84) Vacuum producing devices used in laboratory operations and vacuum producing devices that do not remove or convey air contaminants from or to another source;
- (85) Vents used exclusively for:
  - (i) Sanitary or storm drainage systems; or
  - (ii) Safety valves
- (86) Washing or drying equipment used for products fabricated from metal or glass, if no volatile organic material is used in the process.
- (87) Welding, brazing, or soldering equipment;
- (88) Coffee roasters with a design capacity less than 10 pounds per batch;
- (89) Bark and soil screening operations;
- (90) Portable sand and gravel plants and crushed stone plants with a cumulative rated capacity of all initial crushers less than or equal to 150 tons per hour;
- (91) Fixed sand and gravel plants and crushed stone plants with a cumulative rated capacity of all initial crushers less than or equal to 25 tons per hour.

[Adopted 08/17/06; Amended 10/29/16; 08/17/19; 02/26/22]

#### ***Rule 6.1.1 (Reserved)***

#### ***Rule 6.1.2 Application Processing***

- (a) Application certification. All NOC applications must be signed by the applicant or owner, who may be required to submit evidence of their authority.
- (b) Completeness determination. Within thirty (30) days after receiving an NOC application, the Agency will either notify the applicant in writing that the application is complete or notify the applicant in writing of all additional information necessary to complete the application. Complete applications must include:
  - (1) Any standard NOC form of the Agency that is applicable to the proposed stationary source or modification;
  - (2) An Environmental Checklist consistent with requirements in WAC 197-11-315 of the State Environmental Policy Act (SEPA), for any one of the following:
    - (i) A Determination of Non-significance (DNS) in accordance with WAC 197-11-340;
    - (ii) A Mitigated Determination of Non-significance (MDNS) in accordance with WAC 197-11-350; or,
    - (iii) Written statement by the applicant claiming that the proposed stationary source or modification is categorically exempt from SEPA.
  - (3) When applicable, all information required for review under WAC 173-400-117 and WAC 173-400-700 through 750 and WAC 173-400-800 through 860;



- (4) NOC processing fees in accordance with Rule 3.3(b) and (c); and,
  - (5) Any additional information requested by the Agency that is necessary to make the determinations required under Rule 6.1.4.
- (c) Timeframe for Public Involvement:
- (1) For NOC applications subject to a mandatory public comment period pursuant to Rule 6.1.3(b), the Agency will issue a Preliminary Determination within 60 days from receipt of a complete application followed by a public comment period in accordance with Rule 6.1.3(c).
  - (2) For all other NOC applications, the Agency will post a public comment period in accordance with Rule 6.1.3(a) within 30 days from receipt of an application.
- (d) Final determination schedule. Final Determination on an application subject to a mandatory public comment period in accordance with Rule 6.1.3(b) will be made as promptly as possible after close of the public comment period. Final Determination on all other applications will be made within sixty (60) days of receipt of a complete NOC application.
- (e) Approval. A final determination to approve an NOC application and an “Order of Approval,” setting forth the conditions of approval, will be issued, and served as provided for in these Regulations, provided the following conditions are met:
- (1) A complete application in accordance with Rule 6.1.2(b) was received by the Agency;
  - (2) The application verifies to the Agency that the applicable new source review requirements in Rule 6.1.4 have been met;
  - (3) Application processing fees in accordance with Rule 3.3 have been paid;
  - (4) The application includes an environmental checklist and other documents that verify compliance with the State Environmental Policy Act;
  - (5) Applicable public involvement requirements in Rule 6.1.3 have been met; and,
  - (6) The NOC has been signed by the Executive Director of the Agency or an authorized representative.
- (f) Denial. If the Agency determines that a proposed project subject to approval of an NOC application does not meet the applicable approval requirements in Rule 6.1.3, then a final determination to deny approval and an Order to Deny Construction will be issued and served as provided for in these Regulations. Any Order to Deny Construction must:
- (1) Be in writing;
  - (2) Set forth the objections in detail regarding the specific law or rule or rules of these Regulations that will not be met by the proposed project; and,
  - (3) Must be signed by the Executive Director of the Agency or an authorized representative.
- (g) Scope of review of modifications. New source review of a modification to an existing stationary source is limited to the emission unit proposed to be modified,

and the air contaminants whose emissions would increase because of the action; provided, however, that review of a major modification must also comply with applicable major new source review requirements under Rule 6.1.4(a) and/or Rule 6.1.4(b), as applicable.

- (h) Integration with Title V permitting requirements. A person seeking approval to construct or modify a stationary source subject to chapter 173-401 WAC may elect to integrate review of the operating permit application or amendment required under RCW 70A.15.2260 and the NOC application required by this rule. An NOC application designated for integrated review will be processed in accordance with operating permit program procedures and deadlines in chapter 173-401 WAC. Applications submitted under WAC 173-400-700 through 750 and WAC 173-400-800 through 860 must also comply with public involvement requirements of Rule 6.1.3 and WAC 173-400-171.
- (i) Professional Engineer review and sign-off. Every final determination on an NOC application must be reviewed and signed prior to issuance by a professional engineer, or staff under the direct supervision of a professional engineer.
- (j) Appeals.
  - (1) Any order issued pursuant to this Rule may be appealed to the Pollution Control Hearings Board of the State of Washington, pursuant to Rule 1.8.
  - (2) Any order issued or the failure to issue such an order, does not relieve any person from their obligation to comply with any emission control requirement or with any other provision of law.
- (k) Major NSR obligations of the Agency. If the new stationary source is a major stationary source, or the change is a major modification, the Agency will:
  - (1) Submit any control technology determination included in a final order of approval to the RACT/BACT/LAER clearinghouse maintained by EPA; and
  - (2) Send a copy of the final approval order to EPA.
- (l) Deviations from approved plans. After approval to construct, install, establish, or modify a stationary source or air pollution control device is granted, deviations from the approved plans, drawings, data, and specifications that may result in changes to air pollutant emission rates, control efficiencies or impacts are not permissible without prior approval through an NOC application.

[Adopted 08/17/06; Amended 05/22/10; 02/26/22]

### ***Rule 6.1.3 Public Involvement***

The public will be afforded an opportunity to express interest in any Notice of Construction (NOC) application prior to approval or denial by the Agency.

- (a) Public Notice.
  - (1) A public interest fact sheet must be published on the Agency's website announcing the receipt of permit applications and other proposed actions that do not automatically require a public comment period pursuant to Rule 6.1.3(b). Fact sheets must be published on the Agency's webpage

for a minimum of fifteen (15) days. If publication to the Agency's website is not possible, the fact sheet will be published in a newspaper of general circulation in the area of the proposed action. When published in a newspaper, fact sheets will be published for a minimum of one (1) day.

- (2) The public must be afforded a minimum of fifteen (15) days from initial publishing of a fact sheet to express an interest in a permit application or proposed decision by responding to the Agency in writing via letter, fax, or email.
  - (3) Public interest fact sheets must include:
    - (i) The name of the applicant;
    - (ii) Location of the proposed project;
    - (iii) A brief project description;
    - (iv) Agency contact information;
    - (v) Procedures for submitting comments and the date by which public comments are due;
    - (vi) A statement that a public comment period will be provided if requested by any person, government agency, group, or the applicant.
  - (4) Requests for a public comment period must be submitted to the Agency in writing via letter, fax, or electronic mail. A public comment period must be provided pursuant to Rule 6.1.3(c) for any permit application or proposed action that receives such a request. Any application or proposed action for which a public comment period is not requested may be processed without further public involvement.
  - (5) The Agency must consider comments submitted in accordance with Rule 6.1.3(a)(2) provided they are received prior to close of the comment period specified in the public interest fact sheet.
- (b) Mandatory public comment period. A public comment period in accordance with Rule 6.1.3(c) must be required prior to approval or denial of any NOC application if:
- (1) The proposed project would cause a significant net increase in emissions of any air contaminant listed in the following table:

**Table 6.1a: Significant Emissions Increase**

| AIR CONTAMINANT                             | POTENTIAL<br>TONS/YEAR |
|---------------------------------------------|------------------------|
| Carbon Monoxide (CO)                        | 100.0                  |
| Volatile Organic Compounds (VOC)            | 40.0                   |
| Sulfur Dioxide (SO <sub>2</sub> )           | 40.0                   |
| Nitrogen Oxides (NO <sub>x</sub> )          | 40.0                   |
| Particulate Matter (PM)                     | 25.0                   |
| Fine Particulate Matter (PM <sub>10</sub> ) | 15.0                   |
| Lead                                        | 0.6                    |
| Fluorides                                   | 3.0                    |
| Sulfuric Acid Mist                          | 7.0                    |

|                                                                                                                                 |           |
|---------------------------------------------------------------------------------------------------------------------------------|-----------|
| Hydrogen Sulfide (H <sub>2</sub> S)                                                                                             | 10.0      |
| Total Reduced Sulfur (including H <sub>2</sub> S)                                                                               | 10.0      |
| Total Toxic Air Pollutants (total TAPs)<br>(TAPs as listed in chapter 173-460 WAC)                                              | 25.0      |
| Any single Toxic Air Pollutant (TAP)                                                                                            | 10.0      |
| Municipal waste combustor organics<br>(measured as total tetra-through octa-chlorinated<br>dibenzo-p-dioxins and dibenzofurans) | 0.0000035 |
| Municipal waste combustor metals<br>(measured as PM)                                                                            | 15.0      |
| Municipal waste combustor acid gases<br>(measured as SO <sub>2</sub> and hydrogen chloride)                                     | 40.0      |

- (2) The applicant requests a limit on the potential to emit under Rule 6.1.12;
  - (3) The applicant requests to bank emission reduction credits;
  - (4) The proposed project involves refuse burning equipment;
  - (5) The Executive Director determines that there may be substantial public interest in the proposal;
  - (6) The proposed action is to extend the deadline to begin construction of a major stationary source or major modification in a nonattainment area;
  - (7) A modified or substituted air quality model, other than a guideline model in Appendix W of 40 CFR Part 51 (in effect on June 1, 2003) was used as part of review under Rule 6.1.4;
  - (8) The action involves an order to determine a category wide RACT;
  - (9) The action involves establishing a compliance schedule or variance;
  - (10) The order is to demonstrate the credible height of a stack which exceeds the GEP formula height and sixty-five (65) meters, by means of a fluid model or a field study, or purposes of establishing an emission limitation;
  - (11) The action includes an order to authorize a bubble; or,
  - (12) A public comment period is requested by any person, interested governmental agency, group, or the applicant in accordance with requirements for under Rule 6.1.3(a).
- (c) Public Comment period. If required, a public comment period must be initiated through posting on the Agency's website for the duration of the public comment period. The Agency may supplement this method of notification by publication of a legal notice in a newspaper of daily circulation in the area of proposed action or by other methods appropriate to notify the local community. The public comment period can only be initiated after all information required by the Agency has been submitted and after a Preliminary Determination has been made. The cost of any supplemental noticing must be borne by the applicant per provisions in Rule 3.3. Public notice of any NOC application requiring a public comment period must include the following:
- (1) Availability of the NOC application and any written Preliminary Determination of the Agency in at least one location near the proposed project site or on the Agency's website, excluding any confidential information as provided in Rule 1.6. The Agency's written Preliminary Determination must include the conclusions, determinations, and pertinent

- supporting information from the Agency's analysis of the effect of the proposed project on air quality.
- (2) Publication of a legal notice in a newspaper of general circulation in the area of the proposed project which provides:
    - (i) A brief description of the project;
    - (ii) Location of the project and location of documents made available for public inspection;
    - (iii) The deadline for submitting written comments;
    - (iv) A statement that any person, interested governmental agency, group, or the applicant may request a public hearing; and,
    - (v) A statement that a public hearing may be held if the Agency determines within a 30-day period that significant public interest exists; and,
    - (vi) The date of the close of the public comment period in the event of a public hearing; and,
    - (vii) For projects subject to Special protection requirements for federal Class I areas in WAC 173-400-117(5)(c), the legal notice must explain the permitting agency's decision or state that an explanation of the decision appears in the fact sheet for the proposed PSD permit.
  - (3) Notice to the US Environmental Protection Agency Region 10 Regional Administrator.
  - (d) Extent of public comment period. Unless a public hearing is held, the public comment period must be a minimum of thirty days. If a public hearing is held, the public comment period must extend through the hearing date and thereafter for such period, if any, as the notice of public hearing may specify.
  - (e) Public hearings. The applicant, any interested governmental entity, any group, or any person may request a public hearing within the comment period specified in the public notice. Any such request must indicate, in writing, the interest of the entity filing it and why a hearing is warranted. The Agency may, in its discretion, hold a public hearing if it determines significant public interest exists. Any such hearing will be held upon such notice and at a time and place as the Agency deems reasonable. The Agency must provide at least 30 days prior notice of any hearing.
  - (f) Consideration of public comments. No final decision on any NOC application can be made until all public comment periods have ended and any comments received in accordance with requirements for public comments under Rule 6.1.3 have been considered.
  - (g) Other requirements of law. Whenever procedures permitted or mandated by law will accomplish the objectives of public notice and opportunity for comment, those procedures may be used in lieu of the provisions of this rule (e.g., SEPA). This rule does not apply to an application for a "major modification" or an application for a "major stationary source."
  - (h) Public information. In accordance with Rule 1.6, all information, except information protected from disclosure under any applicable law, including, but not limited to, RCW 70A.15.2510, must be available for public inspection at the

agency. This includes copies of notices of construction applications, orders, and modifications.

[Adopted 08/17/06; Amended 02/26/22]

#### **Rule 6.1.4 Requirements for Approval**

- (a) Attainment or Unclassified area requirements. The following requirements apply to any new stationary source or modification proposed in an attainment or unclassified area:
- (1) The proposed new stationary source or modification will comply with all applicable new source performance standards, national emission standards for hazardous air pollutants, national emission standards for hazardous air pollutants for source categories, emission standards adopted under chapter 70A.15 RCW and applicable emission standards in ORCAA's Regulations.
  - (2) The proposed new stationary source or modification will employ BACT for all air pollutants not previously emitted or whose emissions would increase because of the new stationary source or modification.
  - (3) Allowable emissions from the proposed new stationary source or modification will not delay the attainment date for an area not in attainment nor cause or contribute to a violation of any ambient air quality standard. This requirement will be met if the projected impact of the allowable emissions from the proposed new stationary source or the projected impact of the increase in allowable emissions from the proposed modification at any location within a nonattainment area does not exceed the levels listed in the following table for the pollutants for which the area has been designated nonattainment:

**Table 6.1.b Insignificant Impact Thresholds**

| Pollutant         | Annual Average        | 24-hour Average       | 8-hour Average        | 3-hour Average         | 1-hour Average         |
|-------------------|-----------------------|-----------------------|-----------------------|------------------------|------------------------|
| CO                | -                     | -                     | 0.5 mg/m <sup>3</sup> | -                      | 2.0 mg/m <sup>3</sup>  |
| SO <sub>2</sub>   | 1.0 µg/m <sup>3</sup> | 5.0 µg/m <sup>3</sup> | -                     | 25.0 µg/m <sup>3</sup> | 30.0 µg/m <sup>3</sup> |
| PM <sub>10</sub>  | 1.0 µg/m <sup>3</sup> | 5.0 µg/m <sup>3</sup> | -                     | -                      | -                      |
| PM <sub>2.5</sub> | 0.3 µg/m <sup>3</sup> | 1.2 µg/m <sup>3</sup> | -                     | -                      | -                      |
| NO <sub>2</sub>   | 1.0 µg/m <sup>3</sup> | -                     | -                     | -                      | -                      |

An offsetting emission reduction may be used to satisfy some or all requirements of this rule.

- (4) If the proposed project is subject to WAC 173-400-700 through 750 or WAC 173-400-800 through 860, Ecology has issued a final permit under those programs.
  - (5) If the proposed new stationary source or the proposed modification will emit any toxic air pollutants regulated under chapter 173-460 WAC, the stationary source meets all applicable requirements of that program.
- (b) Nonattainment area requirements. The following requirements apply to any new stationary source or modification proposed in a nonattainment area:

- (1) The proposed new stationary source or modification will comply with all applicable new source performance standards, national emission standards for hazardous air pollutants, national emission standards for hazardous air pollutants for source categories, emission standards adopted under chapter 70A.15 RCW and applicable emission standards in ORCAA's Regulations.
- (2) The proposed new stationary source or modification will employ BACT for all air contaminants, except that if the new stationary source is a major stationary source or the proposed modification is a major modification it will achieve LAER for the air contaminants for which the area has been designated nonattainment and for which the proposed new stationary source or modification is major.
- (3) The proposed new stationary source or modification will not cause any ambient air quality standard to be exceeded, will not violate the requirements for reasonable further progress established by the Standard Operating Procedures and will comply with Rule 6.1.4(a)(3) for all air contaminants for which the area has not been designated nonattainment.
- (4) If the proposed new stationary source is a major stationary source or the proposed modification is a major modification, the Agency has determined, based on review of an analysis performed by the source of alternative sites, sizes, production processes, and environmental control techniques, that the benefits of the project significantly outweigh the environmental and social costs imposed because of its location, construction, or modification.
- (5) If the proposed new stationary source or the proposed modification is major for the air contaminant for which the area is designated nonattainment, allowable emissions from the proposed new stationary source or modification of that air contaminant are offset by reductions in actual emissions from existing sources in the nonattainment area. Emission offsets must be sufficient to ensure that total allowable emissions from existing major stationary sources in the nonattainment area, new or modified sources which are not major stationary sources, and the proposed new or modified stationary source will be less than total actual emissions from existing sources (before submitting the application) so as to represent (when considered together with the nonattainment provisions of section 172 of the Federal Clean Air Act) reasonable further progress. All offsetting emission reductions must satisfy the following requirements:
  - (i) The proposed new level of allowable emissions of the source or emissions unit(s) providing the reduction must be less than the current level of actual emissions of that source or emissions unit(s). No emission reduction can be credited for actual emissions that exceed the current allowable emissions of the source or emissions unit(s) providing the reduction. Emission reductions imposed by local, state, or federal regulations, regulatory orders, or permits required by the Federal Clean Air Act, including the SIP, cannot be credited.

- (ii) The emission reductions must provide for a net air quality benefit. For marginal ozone nonattainment areas, the total emission of volatile organic compounds or total emissions of nitrogen oxides are reduced by a ratio of 1.1 to 1 for the area in which the new stationary source or modification is located. For any other nonattainment area, the emissions offsets must provide a positive net air quality benefit in the nonattainment area. Determinations on whether emissions offsets provide a positive net air quality benefit will be made in accordance with the guidelines contained in 40 CFR 51 Appendix S (in effect on July 1, 2000).
  - (iii) If the offsets are provided by another source, the reductions in emissions from that source must be federally enforceable by the time the order of approval for the new or modified stationary source is effective. An emission reduction credit issued under WAC 173-400-131 may be used to satisfy some, or all, of the offset requirements of this rule.
- (6) If the proposed new stationary source is a major stationary source or the proposed modification is a major modification, the owner or operator has demonstrated that all major stationary sources owned or operated by such person (or by any entity controlling, controlled by, or under common control with such persons) in Washington are subject to emission limitations and are in compliance, or on a schedule for compliance, with all applicable emission limitations and standards under the Federal Clean Air Act, including all rules in the SIP.
  - (7) If the proposed new stationary source or modification is subject to WAC 173-400-700 through 750 and WAC 173-400-800 through 860, Ecology has issued a final permit under these programs.
  - (8) If the proposed new stationary source or modification will emit any toxic air pollutants regulated under chapter 173-460 WAC, the source meets all applicable requirements of that chapter.
  - (9) If the proposed new stationary source is a major stationary source within the meaning of WAC 173-400-710 or 810, or the proposed modification is a major modification within the meaning of WAC 173-400-710 or 810, the project meets the special protection requirements for federal Class I areas in WAC 173-400-117.

[Adopted 08/17/06; Amended 02/26/22]

#### ***Rule 6.1.5 Notice of Completion – Order of Violation***

- (a) The owner or applicant must notify the Agency of the completion of construction, installation, establishment, or modification of a stationary source approved through an NOC application and, in the case of a new stationary source, the date upon which operation will commence. The Agency may inspect the new or modified stationary source and may issue an Order of Violation if it is found that it is not in accord with the approved NOC application or Order of Approval.
- (b) Upon receipt of an Order of Violation, the owner may appeal the order in accordance with the provisions and procedures in Rule 1.8 and Rule 2.1 of these Regulations.



- (c) The issuance of approval as provided by Rule 6.1.2(e) does not relieve the owner of the obligation to comply with the laws or regulations as adopted by this Agency or prevent the Board or Executive Director from issuing violation notices as provided by Rule 1.5(b).

[Adopted 08/17/06; Amended 02/26/22]

#### ***Rule 6.1.6 Time Limit on Approval of Construction***

Approval to construct or modify a stationary source becomes invalid if construction is not commenced within eighteen months after receipt of the approval, if construction is discontinued for a period of eighteen months or more, or if construction is not completed within a reasonable time. The Agency may extend the eighteen-month period upon a satisfactory showing that an extension is justified. An extension for a project operating under a PSD permit must also comply with public notice requirements in WAC 173-400-171. This provision does not apply to the period between construction of the approved phases of a phased construction project. Each phase must commence construction within eighteen months of the projected and approved commencement date.

[Adopted 08/17/06; Amended 02/26/22]

#### ***Rule 6.1.7 (Reserved)***

#### ***Rule 6.1.8 Conditions in Orders of Approval Enforceable***

Failure to comply with any term or condition of an Order of Approval constitutes a violation of this rule and is subject to penalties pursuant to RCW 70A.15.3150 and RCW 70A.15.3160.

[Adopted 08/17/06; Amended 02/26/22]

#### ***Rule 6.1.9 Work Done Without Approval***

Where work, for which a Notice of Construction is required, is commenced, or performed prior to making application and receiving approval, the Executive Director or an authorized agent may investigate as part of the Notice of Construction review. In such a case, an investigation fee, in addition to the fees of Rule 3.3 may be assessed in an amount up to 3 times the fees required of Rule 3.3. Payment of the fees does not relieve any person from the requirement to comply with the regulations nor from any penalties for failure to comply.

[Adopted 08/17/06; Amended 02/26/22]

#### ***Rule 6.1.10 Requirements for Replacement or Substantial Alteration of Emission Control Technology at an Existing Stationary Source***

- (a) Any person proposing to replace or substantially alter the emission control technology installed on an existing stationary source must file a Notice of Construction (NOC) application with the Agency. Replacement or substantial alteration of control technology does not include routine maintenance, repair, or similar parts replacement.
- (b) For projects not otherwise reviewable under Rule 6.1(a)(1) or Rule 6.1(a)(2), the Agency may:

- (1) Require that the owner or operator employ RACT on the affected stationary source;
  - (2) Prescribe reasonable operation and maintenance conditions for the control equipment; and,
  - (3) Prescribe other requirements as authorized by chapter 70A.15 RCW.
- (c) Within 30 days of receipt of a Notice of Construction application under this rule the Agency will notify the applicant in writing that the application is complete or notify the applicant in writing of all additional information necessary to complete the application. Within thirty days of receipt of a complete NOC application under this rule the Agency will issue an order of approval or a proposed RACT determination for the proposed project.
  - (d) Construction must not commence on a project subject to review under this rule until the Agency issues a final order of approval. However, any NOC application filed under this rule will be deemed to be approved without conditions if the Agency takes no action within 30 days of receipt of a complete NOC application.
  - (e) Approval to replace or substantially alter emission control technology will become invalid if construction is not commenced within 18 months after receipt of such approval, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Agency may extend the 18-month period upon satisfactory showing that an extension is justified. This provision does not apply to the period between construction of the approved phases of a phased construction project; each phase must commence construction within 18 months of the projected and approved commencement date.

[Adopted 08/17/06; Amended 08/17/19; 02/26/22]

### ***Rule 6.1.11 Change of Conditions***

- (a) The owner or operator of a stationary source may request, at any time, a change in conditions of an approval order issued by the Agency and the Agency may approve the request provided the Agency finds that:
  - (1) The change in conditions will not cause the source to exceed an emissions standard;
  - (2) No ambient air quality standard or PSD increment will be exceeded because of the change;
  - (3) The change will not adversely impact the ability of the Agency to determine compliance with an emissions standard;
  - (4) The revised order continues to require BACT, as defined at the time of the original approval, for each new stationary source approved by the order except where the Federal Clean Air Act requires LAER; and
  - (5) The revised order meets the requirements of Rule 6.1, as applicable.
  - (6) If the order was issued under WAC 173-400-700 through 750 or WAC 173-400-800 through 860, the revised order will meet any applicable requirements of those sections.
- (b) Actions taken under this rule are subject to the public involvement provisions of Rule 6.1.3.

- (c) Requests must be made on forms provided by the Agency and must follow the procedures and timelines for an NOC application as specified in Rule 6.1. The fee schedule found in Rule 3.3 also applies to these requests.
- (d) Changes involving construction, installation or establishment of a stationary source or modification of an existing source require approval under Rule 6.1(a).

[Adopted 08/17/06; Amended 02/26/22]

### ***Rule 6.1.12 Voluntary Limits on Emissions***

- (a) Upon request by the owner or operator of a source, the Agency will issue a regulatory order that limits the source's potential to emit any air contaminant or contaminants to a level agreed to by the owner or operator and the Agency.
- (b) A condition contained in an order issued under this rule must be less than the source's otherwise allowable annual emissions of a particular contaminant under all applicable requirements of the chapter 70A.15 RCW and the FCAA, including Washington State Implementation Plan. The term "condition" refers to limits on production or other limitations, in addition to emissions limitation.
- (c) Any order issued under this rule must include monitoring, record keeping and reporting requirements to ensure that the source complies with any condition established under this rule. Monitoring requirements must use terms, test methods, units, averaging periods, and other statistical conventions consistent with the requirements of WAC 173-400-105.
- (d) Any order issued under this rule is subject to the notice and comment procedures under Rule 6.1.3.
- (e) The terms and conditions of a regulatory order issued under this rule are federally enforceable upon approval of this rule as an element of the Washington State Implementation Plan. Any proposed deviation from a condition contained in an order issued under this rule requires revision or revocation of the order.

[Adopted 08/17/06; Amended 02/26/22]

## **RULE 6.2 OUTDOOR BURNING**

To maintain air quality at desirable levels, it is the policy of ORCAA to minimize to the greatest extent reasonably possible the burning of outdoor fires. Consistent with this policy, the Board declares that such fires should be allowed only on a limited basis under strict regulation and close control. The Board also encourages the fostering and development of an alternate technology or method of disposing of natural vegetation, which is reasonably economical and less harmful to the environment.

[Adopted 08/17/06; Repealed/Replaced 03/18/11; Amended 02/26/222]

### ***Rule 6.2.1 The provisions of this rule apply to:***

- (a) Agricultural burning
- (b) Fire training fires
- (c) Land clearing burning
- (d) Native American ceremonial fires
- (e) Recreational fires
- (f) Residential burning
- (g) Storm and flood debris burning
- (h) Weed abatement fires

### **Rule 6.2.2 Definitions**

When used in this Rule the following definitions apply:

**“Agricultural burning”** means the burning of vegetative debris from an agricultural operation necessary for disease or pest control, necessary for crop propagation and/or crop rotation, or where identified as a best management practice by the agricultural burning practices and research task force established in RCW 70A.15.5090 or other authoritative source on agricultural practices. Propane flaming of vegetative debris is considered commercial agricultural burning.

**“Air Pollution Episode”** means a period when a forecast, alert, warning, or emergency air pollution state is declared, as stated in chapter 173-435 WAC.

**“Burn ban”** means an “air pollution episode”, or a period of “impaired air quality” as defined in RCW 70A.15.3580.

**“Extinguish”** means to put out a fire completely. It must be cool to the touch and not smoldering or smoking.

**“Firewood”** means clean, dry, seasoned, untreated wood used as fuel in a Native American ceremonial fire or recreational fire.

**“Land Clearing Burning”** means outdoor burning of trees, stumps, shrubbery, or other natural vegetation from land clearing projects (i.e., projects that clear the land surface so it can be developed, used differently, or left unused).

**“Outdoor Burning”** means the combustion of material in an open fire or in an open container, without providing for the control of combustion or the control of the emissions from the combustion.

**“Nuisance”** means an emission that unreasonably interferes with the use and enjoyment of property.

**“Recreational Fire”** means cooking fires or campfires using firewood which occur in designated areas on public lands, or on private property. Fires used for disposal are not recreational fires.

**“Residential Burning”** means the outdoor burning of leaves, clippings, prunings, and other yard and gardening refuse originating on the maintained area of residential property (i.e., lands immediately adjacent and near a human dwelling) and burned on such lands by the property owner and/or another responsible person.

**“Urban Growth Area”** (UGA) means land, generally including land associated with an incorporated city, designated by a county for urban growth under [RCW 36.70A.110](#).

[Adopted 03/18/11; Amended 02/26/22]

### **Rule 6.2.3 No Burn Areas:**

No residential or land clearing burning is allowed in the following cities and/or UGAs:

| <b>Clallam</b>                                                                | <b>Grays Harbor</b> | <b>Jefferson</b>                          | <b>Mason</b>                | <b>Pacific</b>                                           | <b>Thurston</b>                                                                    |
|-------------------------------------------------------------------------------|---------------------|-------------------------------------------|-----------------------------|----------------------------------------------------------|------------------------------------------------------------------------------------|
| Carlsborg<br>Clallam Bay<br>Forks<br>Joyce<br>Port Angeles<br>Sekiu<br>Sequim | Aberdeen<br>Hoquiam | Port Townsend<br>Irondale<br>Port Hadlock | Allyn<br>Belfair<br>Shelton | Ilwaco<br>Long Beach<br>Raymond<br>Seaview<br>South Bend | Bucoda<br>Grand Mound<br>Lacey<br>Olympia<br>Rainier<br>Tenino<br>Tumwater<br>Yelm |

[Adopted 03/18/11; Amended 02/04/12; Amended 02/26/22]

### **Rule 6.2.4 Summer Burn Restrictions**

No residential or land clearing burning is allowed in Thurston County from July 15<sup>th</sup> through September 30<sup>th</sup>.

[Adopted 03/18/11; Amended 08/12/16]

### **Rule 6.2.5 Prohibitions and restrictions**

- (a) It is unlawful for any person to cause or allow an outdoor fire containing prohibited materials which include but are not limited to garbage, dead animals, asphalt, petroleum products, paints, rubber products, plastics, paper, cardboard, treated wood, processed wood, construction/ demolition debris, metal, or any substance which when burned releases toxic emissions, dense smoke, or obnoxious odors. A limited amount of paper may be used to start the fire. ORCAA may allow the limited burning of prohibited materials for fire training.
- (b) It is illegal to burn vegetation originating in any area where burning is prohibited as listed in Rule 6.2.3.
- (c) A person capable of extinguishing the fire must attend it at all times, and the fire must be extinguished before leaving it.
- (d) Containers (not regulated under WAC 173-400-070(1)) used for outdoor burning, must be constructed of concrete or masonry with a completely enclosed combustion chamber and equipped with a permanently attached spark arrester constructed of iron, heavy wire mesh, or other noncombustible material with openings not larger than one-half inch.
- (e) The use of burn barrels is illegal.
- (f) A fire protection agency, county, conservation district, or other governing body may enforce its own regulations that are stricter than those set forth in this rule.
- (g) It is unlawful for any person to cause or allow an emission from outdoor burning that is detrimental to the health, safety, or welfare of any person, that causes damage to property or business, or that causes a nuisance.

[Adopted 03/18/11; Amended 02/26/22]

### **Rule 6.2.6 Curtailment**

- (a) No outdoor fire can be ignited in a geographical area where an impaired air quality or episode has been declared.
- (b) The person responsible for an outdoor fire must extinguish the fire when a burn ban is declared.
- (c) Three (3) hours after a burn ban is declared smoke visible from all types of outdoor burning, except land clearing burning, constitutes prima facie evidence of unlawful outdoor burning.
- (d) Eight (8) hours after a burn ban is declared smoke visible from land clearing burning constitutes prima facie evidence of unlawful outdoor burning.

[Adopted 03/18/11; Amended 02/26/22]

### ***Rule 6.2.7 Recreational Burning***

The following burn practices must be used for recreational burning where allowed.

- (a) Maximum pile size is three (3) feet in diameter and two (2) feet high.
- (b) Only dry, seasoned firewood or charcoal and enough clean paper necessary to start a fire may be burned.

[Adopted 03/18/11; Amended 02/26/22; 03/06/23]

### ***Rule 6.2.8 Permit Program***

ORCAA may consult with fire protection authorities, conservation districts, or counties to determine if any of these agencies are capable and willing to serve as the permitting agency and/or enforcing agency for specific types of burning. Permitting agencies may use, as appropriate, a verbal, electronic, written, or general permit established by rule, for any type of burning that requires a permit.

- (a) Permitting agencies may deny an application or revoke a previously issued permit if it is determined that the application contained inaccurate information, failed to contain pertinent information or the permitted activity has caused a nuisance.
- (b) Failure to comply with any term or condition of a permit constitutes a violation of this rule and is subject to penalties pursuant to RCW 70A.15.3150 and RCW 70A.15.3160.
- (c) Types of burning that require a written permit.
  - (1) Agricultural burning must abide by Rule 6.2 and all conditions of the written permit issued by ORCAA or another permitting agency.
  - (2) Fire training fires, except as provided in RCW 52.12.150, may be conducted provided all the following requirements are met:
    - (i) Fire training must not occur during a burn ban.
    - (ii) The fire must be for training.
    - (iii) The agency conducting the training fire must obtain any permits, licenses, or other approvals required by any entity for such training fires. All permits, licenses, and approvals must be kept on-site and available for inspection.

- (3) Land Clearing Burning requires an approved written permit. Conditions of the written permit issued by ORCAA or another permitting agency are enforceable.
- (4) Storm and flood debris resulting from a declared emergency by a governmental authority may be burned within two years of the event (storm). Burning must abide by Rule 6.2 and all conditions of the written permit issued by ORCAA or another permitting agency.
- (5) Weed abatement fires.
- (6) Residential fires in Thurston County.

The permit application for the above permits must be accompanied by the applicable fee, pursuant to Rule 3.4.

- (d) Where residential burning is allowed and no written burn permits are issued, burning must abide by Rule 6.2 and the following:
  - (1) Maximum pile size is four (4) feet in diameter and three (3) feet high.
  - (2) Only one pile may be burned at a time, and each pile must be extinguished before lighting another.
  - (3) Only natural vegetation may be burned.
  - (4) No fires are to be within fifty (50) feet of structures or within five hundred (500) feet of forest slash.
  - (5) No tree stumps may be burned.

[Adopted 03/18/11; Amended 10/11/15; 02/26/22;03/06/23]

## **RULE 6.3 ASBESTOS**

The Board of Directors of the ORCAA recognize asbestos is a serious health hazard. Any asbestos fibers released into the air can be inhaled and can cause lung cancer, pleural mesothelioma, peritoneal mesothelioma, or asbestosis. The Board has determined any asbestos emitted to the ambient air is air pollution. Because of the seriousness of the health hazard, the Board of Directors has adopted this regulation to control asbestos emissions from asbestos removal projects to protect public health. The Board adopted these regulations to coordinate with the EPA asbestos NESHAP, the OSHA asbestos regulation, the Washington Department of Labor and Industries asbestos regulations, the Washington Department of Ecology Dangerous Waste regulation, and the solid waste regulations of Clallam, Grays Harbor, Jefferson, Mason, Pacific, and Thurston counties.

[Adopted 08/17/06; Amended 09/19/08; 10/29/16; 02/26/22]

### ***Rule 6.3.1 Definitions***

When used in this Rule the following definitions apply:

**Asbestos** – The asbestiform varieties of serpentinite (chrysotile), riebeckite (crocidolite), cummingtonite-grunerite (amosite), anthophyllite, and actinolite-tremolite.

**Asbestos-containing Materials (ACM)** – Any material containing more than one percent (1%) asbestos as determined using the method specified in EPA *Method for the Determination of Asbestos in Building Materials* EPA/600/R-93/116, July 1993, or more

effective method as approved or required by EPA. This definition includes all loose vermiculite used as insulation.

**Asbestos-containing Waste Material** – Any waste that contains or is contaminated with asbestos-containing material. Asbestos-containing waste material includes asbestos waste from control equipment, materials used to enclose the work area during an asbestos project, asbestos-containing material collected for disposal, asbestos-contaminated waste, debris, containers, bags, protective clothing, or HEPA filters. Asbestos-containing waste material does not include samples of asbestos-containing material taken for testing or enforcement purposes.

**Asbestos Hazard Emergency Response Act (AHERA) Building Inspector** – A person who has successfully completed the training requirements for a building inspector established by EPA Asbestos Model Accreditation Plan (40 CFR Part 763, Appendix C to Subpart E.I.B.3) and whose certification is current.

**Asbestos Hazard Emergency Response Act (AHERA) Project Designer** – A person who has successfully completed the training requirements for an abatement project designer established by EPA regulations (40 CFR 763.90(g)) and whose certification is current.

**Asbestos Project** – Any activity involving the abatement, renovation, demolition, removal, salvage, clean up, or disposal of asbestos-containing materials, or any other action that disturbs or is likely to disturb any asbestos-containing materials. It includes the removal and disposal of stored asbestos-containing materials or asbestos-containing waste material. This term does not include the application of duct tape, rewettable glass cloth, canvas, cement, paint, or other non-asbestos materials to seal or fill exposed areas where asbestos fibers may be released.

**Asbestos Survey** – A written report describing an inspection using the procedures contained in EPA regulations (40 CFR 763.86 and 40 CFR 763.87), or an alternate method that has received prior written approval from the Executive Director, or designee, to determine whether materials or buildings to be worked on, removed, disturbed, or demolished, contain asbestos.

**Component** – Any equipment, pipe, structural member, or other item covered or coated with, or manufactured from, asbestos-containing materials.

**Demolition** – Wrecking, razing, dismantling, burning via fire protection agency training, or removal of any load supporting structural member of a structure, including any related handling operations, making all or part of the structure permanently uninhabitable or unusable.

**Friable Asbestos-containing Materials** – Asbestos-containing materials that when dry can be crumbled, disintegrated, or reduced to powder by hand pressure or by the forces expected to act upon the materials during demolition, renovation, or disposal.



**HEPA Filter** – A High Efficiency Particulate Air filter found in some respirators and vacuum systems. HEPA filters must be capable of filtering 0.3 micrometer mean aerodynamic diameter particles with 99.97% efficiency.

**Leak-Tight Container** – A dust-tight and liquid-tight container that encloses asbestos-containing waste material and prevents solids or liquids from escaping or spilling out. Such containers may include sealed plastic bags, metal or fiber drums, and sealed polyethylene plastic.

**Liquid Wetting Agent** – Water in which a surfactant (detergent) has been added.

**Non-friable Asbestos-containing Materials** – Asbestos-containing materials that, when dry, cannot be crumbled, disintegrated, or reduced to powder by hand pressure or other forces expected to act on the materials during demolition, renovation, or disposal.

**Renovation** – To make changes or repairs, other than demolition, to a structure.

**Single-Family Residence** – Any structure containing space for use such as living, sleeping, food preparation and eating. This term includes houses, mobile homes, detached garages, houseboats, and houses with a “mother-in-law apartment” or “guest room”. This term does not include multiple-family units (such as apartments, duplexes, condominiums, etc.), nor does this term include any mixed-use building, structure, or installation that contains a residential unit.

**Surfacing Material** – Material sprayed or troweled on, or otherwise applied to surfaces including, but not limited to, acoustical plaster on ceilings, paints, fireproofing materials on structural members, or other materials on surfaces for decorative purposes.

**Suspect Material** – Material that has historically contained asbestos including, but not limited to, surfacing material, thermal system insulation, roofing material (except 3-tab composite roofing), fire barriers, gaskets, flooring material, and cement or concrete siding.

**Thermal System Insulation** – Material applied to pipes, fittings, boilers, tanks, ducts, or other structural components to prevent heat loss or gain.

**Visible Asbestos Emissions** – Any asbestos-containing materials that are visually detectable without the aid of instruments.

**Waste Generator** – Any owner or operator of a facility whose act or process produces asbestos-containing waste material.

**Waste Shipment Record** – The shipping document required to be originated and signed by the owner or operator, used to track, and substantiate the disposition of asbestos-containing waste material.

[Adopted 08/17/06; Amended 09/19/08; 10/29/16; 02/26/22]

### ***Rule 6.3.2 Asbestos Survey Requirements***

- (a) Renovation. An asbestos survey is required for any renovation involving 48 square feet, or more, of suspect asbestos material. The property owner or the owner's agent must determine whether there are suspect asbestos-containing materials (ACM) in the work area and obtain an asbestos survey by an Asbestos Hazard Emergency Response Act (AHERA) building inspector. An AHERA building inspector is not required for asbestos surveys associated with the renovation of a single-family residence. In lieu of a survey, the owner of the residence may collect samples to have analyzed by a National Voluntary Laboratory Accreditation Program (NVLAP) certified lab per 40 CFR 763.87.
  - (1) A summary of the results of the asbestos survey must be available at the work site and communicated to all persons who may encounter the material.
  - (2) If there are no suspect materials in the work area, this determination must be available at the work site and communicated to all persons involved in the renovation.
  - (3) It is not required that an AHERA building inspector sample any material presumed to be ACM.
- (b) Demolition. It is unlawful for any person to cause or allow any demolition unless the property owner or the owner's agent obtains an asbestos survey, by an AHERA building inspector, of the structure.
  - (1) It is not required that an AHERA building inspector evaluate any material presumed to be ACM.
  - (2) Only an AHERA building inspector may determine that a suspect material does not contain asbestos.
  - (3) A summary of the results of the asbestos survey must be available at the work site and communicated to all persons who may encounter the material.

[Adopted 08/17/06; Amended 09/19/08; 04/26/15; 10/29/16; 02/26/22]

### ***Rule 6.3.3 Controlled and Regulated Substances***

- (a) It is unlawful to cause or allow visible asbestos emissions, including emissions from asbestos waste materials:
  - (1) On public or private lands, on developed or undeveloped properties and on any open uncontrolled and non-designated disposal sites;
  - (2) During the collection, processing, handling, packaging, transporting, storage, and disposal of any asbestos-containing waste material; or
  - (3) From any fugitive source.

[Adopted 08/17/06; Amended 09/19/08; 10/29/16; 02/26/22]

### ***Rule 6.3.4 Notification Requirements***

- (a) It is unlawful for any person to cause or allow any work on an asbestos project or demolition unless a complete notification, including the required fee and any additional information requested by the Executive Director, or designee, has

been submitted to the ORCAA on approved forms, in accordance with the notification period requirements contained in 6.3.4(c) Notification Period:

- (1) Notification is required for all demolitions of structures with a footprint greater than 120 square feet, even if no ACM is present. All other demolition requirements remain in effect.
- (2) Per Rule 3.5, the appropriate nonrefundable fee must accompany the notification.
- (3) A copy of the notification, all amendments to the notification, the asbestos survey, and a work plan for an alternate means of compliance must be available for inspection at the asbestos project or demolition site.
- (4) Notification for multiple asbestos projects or demolitions may be filed by a property owner or agent on one form if all the following criteria are met:
  - (i) The same contractor will perform the work continuously; and,
  - (ii) A work plan is submitted that includes: a map clearly identifying the structures involved in the project; the amount and type of ACM in each structure; and the schedule for performing asbestos project and demolition work; and,
  - (iii) The project must be bid as a group under the same contract; and
  - (iv) The structures must be on contiguous property.

**(b) Exemptions from Notification**

- (1) Notification is not required for asbestos projects containing less than 10 linear feet on pipe or 48 square feet (per structure, per calendar year) of any ACM.
- (2) Notification is not required for removal and disposal of non-friable caulking, window glazing and roofing.

**(c) Notification Period**

| <b>Project</b>               | <b>Notification Period</b>                       |
|------------------------------|--------------------------------------------------|
| Asbestos                     | 10 days prior to commencement of work on project |
| Asbestos-NESHAP <sup>1</sup> | 14 days prior to commencement of work on project |
| Asbestos Project Amendments  | Prior Notice                                     |
| Demolition                   | 14 days prior to commencement of work on project |
| Emergency                    | Prior Notice                                     |

- (1) The duration of an asbestos project must not exceed one year from date of submission of the original notification.
- (2) The Executive Director, or designee, may waive the notification period, by written authorization, for disposal of unused and intact or abandoned (without the knowledge or consent of the property owner) ACM. All other asbestos project and demolition requirements remain in effect.

[Adopted 08/17/06; Amended 09/19/08; 10/29/16; 02/26/22]

<sup>1</sup> Projects subject to 40 CFR Part 61 Subpart M must comply with the 14-day notification period.

### ***Rule 6.3.5 Annual Notification***

- (a) A property owner or agent may file one annual notification for asbestos projects on one or more structures, vessels, or buildings during each calendar year if all the following conditions are met:
  - (1) The annual notification must be filed with ORCAA before beginning work on any asbestos project included in the annual notification;
  - (2) The annual notification covers only those structures, vessels, or buildings from the same industrial grouping located on contiguous or adjacent properties and are under common ownership and control.
  - (3) The total amount of ACM removed is less than 260 linear feet on pipes or less than 160 square feet of any ACM; and
  - (4) The property owner or agent submits quarterly written reports to the Executive Director, or designee, on ORCAA-approved forms within 15 days after the end of each calendar quarter.

[Adopted 08/17/06; Amended 09/19/08; 10/29/16; 02/26/22]

### ***Rule 6.3.6 Asbestos Project Amendments***

- (a) The original applicant will submit an amendment on or before the completion date on file to the Executive Director, or a designee, for the following changes in a project:
  - (1) Change in the quantity of asbestos to be removed; or
  - (2) Changes in the ACM that will be removed; or
  - (3) Change of contractor; or
  - (4) Changes in the start date, completion date, or work schedule, including hours of work.

[Adopted 10/29/16; Amended 02/26/22]

### ***Rule 6.3.7 Emergencies—Exceptions to Advance Notification Period***

- (a) The Executive Director, or designee, may waive the advance notification period, if the property owner or agent submits a written request that demonstrates to the Executive Director, or designee, that an asbestos project or demolition must be conducted immediately because of any of the following:
  - (1) There was an event that resulted in a public health or safety hazard;
  - (2) The project must proceed immediately to protect equipment, ensure continuous vital utilities, or minimize property damage;
  - (3) ACM were encountered that were not identified during the asbestos survey; or,
  - (4) The project must proceed to avoid imposing an unreasonable burden.

[Adopted 10/29/16; Amended 02/26/22]

### ***Rule 6.3.8 Asbestos Removal Requirements Prior to Renovation or Demolition***

- (a) Except as provided in Rule 6.3.8(b), it is unlawful for any person to cause or allow any demolition or renovation that may disturb ACM or damage a structure to preclude access to ACM for future removal, without first removing all ACM in accordance with the requirements of this regulation. ACM need not be removed from a component if the component can be removed, stored, or transported for reuse without disturbing or damaging the asbestos.
- (b) Inaccessible Asbestos Removal Requirements. ACM may be removed during demolition, if the property owner demonstrates to the Executive Director, or designee, through a work plan, that the ACM is not accessible such as:
  - (1) Structures or buildings that are structurally unsound and in danger of imminent collapse;
  - (2) Conditions that are immediately dangerous to life and health;
  - (3) Unable to access all asbestos material prior to demolition.
  - (4) The owner must submit:
    - (i) written determination of the hazard by an authorized government official or a licensed structural engineer; and,
    - (ii) a work plan outlining the procedures that will be followed to control asbestos emissions during the demolition or renovation and disposal of the asbestos-containing waste material.

[Adopted 10/29/16; Amended 02/26/22]

### ***Rule 6.3.9 Procedures for Asbestos Projects***

- (a) Training Requirements. It is unlawful for any person to cause or allow any work on an asbestos project unless it is performed by persons trained and certified in accordance with the standards established by the Washington State Department of Labor and Industries, the federal Occupational Safety and Health Administration, or the United States Environmental Protection Agency (whichever agency has jurisdiction) and whose certificate is current. This certification requirement does not apply to individuals who work on asbestos projects on their own single-family residence(s).
- (b) Asbestos Work Practices. Except as provided in Rule 6.3.4(b)(2) of this Rule, it is unlawful for any person to cause or allow the removal of ACM unless all the following requirements are met:
  - (1) The asbestos project must be conducted in a controlled area, clearly marked by barriers and asbestos warning signs. Access to the controlled area must be restricted to authorized personnel only.
  - (2) If a negative pressure enclosure is employed it must be equipped with transparent viewing ports, if feasible, and must be maintained in good working order. Emissions from the negative air exhaust must be controlled by a HEPA filter.
  - (3) Absorbent ACM, such as surfacing material and thermal system insulation, must be saturated with a liquid wetting agent prior to removal. Any unsaturated absorbent ACM exposed during removal must be immediately saturated with a liquid wetting agent. All absorbent asbestos-containing waste material must be kept saturated with a liquid wetting

agent until sealed in leak-tight containers. All asbestos-containing waste material must be sealed in leak-tight containers as soon as possible after removal but no later than the end of each work shift.

- (4) Nonabsorbent ACM, such as cement asbestos board or vinyl asbestos tile, must be continuously coated with a liquid wetting agent on any exposed surface prior to and during removal. Any dry surfaces of nonabsorbent ACM exposed during removal must be immediately coated with a liquid wetting agent. All nonabsorbent asbestos-containing waste material must be kept coated with a liquid wetting agent until sealed in leak-tight containers.
- (5) Metal components (such as valves and fire doors) that have internal ACM are exempt from the requirements of 6.3.4 if all access to the ACM is welded shut or the component has mechanical seals, which cannot be removed by hand, that separate the ACM from the environment.
- (6) ACM that are being removed, have been removed, or may have fallen off components during an asbestos project must be carefully lowered to the ground or a lower floor, not dropped, thrown, slid, or otherwise damaged, unless enclosed inside a negative-pressure enclosure.
- (7) The exterior of each leak-tight container must be free of all asbestos residue and permanently marked with the date the material was collected for disposal, the name of the waste generator, and the address at which the waste was generated. This marking must be readable without opening the container.
- (8) It is unlawful to allow visible asbestos emission from an asbestos project. Leak-tight containers must not be dropped, thrown, slid, or otherwise damaged.
- (9) The asbestos-containing waste material must be stored in a controlled area until transported to an approved waste disposal site.
- (10) It is unlawful for any person to create or allow a condition that results in the disturbance, or likely disturbance, of ACM. Such unlawful activity includes but is not limited to: Not removing all ACM in a structure scheduled for demolition; partially removing ACM and leaving remaining ACM in a state making it more susceptible to being disturbed; or, leaving it on the ground, outside and open to the environment.

[Adopted 10/29/16; Amended 02/26/22]

#### ***Rule 6.3.10 Disposal of Asbestos-Containing Waste Material***

- (a) Except as provided in 6.3.10(c) of this Regulation, ACM must be transferred offsite within 10 days of removal. The ACM may be transferred to an approved temporary storage site or to a waste disposal site operated in accordance with 40 CFR 61.154 or 40 CFR 61.155.
- (b) Temporary Storage Site. A person may establish a facility for collecting and temporarily storing asbestos-containing waste material if the facility is approved by the Executive Director, or designee, and all the following conditions are met:
  - (1) Accumulated asbestos-containing waste material must be kept in a controlled storage area posted with asbestos warning signs and accessible only to authorized persons;

- (2) All asbestos-containing waste material must be stored in leak-tight containers and the leak-tight containers must be maintained in good condition;
  - (3) The storage area must be locked except during transfer of asbestos-containing waste material; and
  - (4) Storage, transportation, disposal, and return of the waste shipment record to the waste generator must not exceed 90 days.
- (c) Disposal of Asbestos Cement Pipe. Asbestos cement water pipe used on a public right-of-way or public easement is excluded from the disposal requirements of Rule 6.3.10 if the following conditions are met:
- (1) Asbestos cement pipe may be buried in place if the pipe is left intact (e.g., not moved, broken or disturbed) and covered with at least three (3) feet or more of non-asbestos fill material and the state, county or city authorities are notified in writing of buried asbestos cement pipe; and
  - (2) All asbestos-containing waste material, including asbestos cement water pipe fragments that are one (1) linear foot or less, protective clothing, HEPA filters, or other asbestos contaminated material, debris, or containers, will be subject to the requirements of Rule 6.3.

[Adopted 10/29/16; Amended 02/26/22]

#### ***Rule 6.3.11 Compliance with other Rules***

Other government agencies have adopted rules that may apply to asbestos projects regulated under these rules including, but not limited to, the United States Environmental Protection Agency (EPA), the Occupational Safety and Health Administration (OSHA), and the Department of Labor and Industries. Nothing in the Agency's rules excuse any person from complying with any other applicable local, state, or federal requirement.

[Adopted 10/29/16; Amended 02/26/22]

### **RULE 6.4 NOTICE OF INTENT TO OPERATE**

- (a) A Notice of Intent to Operate may be filed with the Agency in lieu of a Notice of Construction for the following sources:
  - (1) Temporary Portable Stationary Sources. Relocation of temporary portable stationary sources having a valid Order of Approval from Ecology or a local air pollution control agency in the State of Washington.
  - (2) Stationary Sources based on Potential to Emit. Any stationary source that will have a combined uncontrolled potential to emit from all emission units less than:
    - (i) 0.5 tons per year of any criteria pollutant; and,
    - (ii) 1.0 tons per year of total criteria pollutants and VOC combined; and,
    - (iii) 0.005 tons per year of lead; and,
    - (iv) The de minimis emission rate specified for each Toxic Air Pollutant listed in WAC 173-460-150; and,
    - (v) 1.0 tons per year of ozone depleting substances combined.

- (3) Gasoline Dispensing Facilities (GDF). Construction or modification of a gasoline dispensing facility, or replacement or substantial alteration of vapor recovery systems, provided that:
  - (i) The installed equipment is in accordance with the current California Air Resources Board (CARB) Executive Orders as defined in Rule 8.12 listed on the GDF Notification form effective at the time of the filing;
  - (ii) The GDF is not part of a stationary source subject to the Air Operating Program (Rule 5);
  - (iii) The GDF is not subject to any of the Stage II requirements in WAC 173-491-040(5); and
  - (iv) The project does not involve the removal of a Stage II vapor recovery system.
- (b) A Notice of Intent to Operate must be filed with the agency for nonroad engines (as defined in WAC 173-400-035) as required by WAC 173-400-035.
- (c) A complete Notice of Intent to Operate (NOI) application must be filed at least 15 days prior to starting operation of the source.
- (d) NOI applications will be made on standard forms of the Agency and will include:
  - (1) All information requested in the applicable standard forms;
  - (2) If submitting a NOI for a stationary source qualifying for the exemption based on potential to emit under Rule 6.4(a)(2), documentation verifying the stationary source's potential to emit;
  - (3) If submitting a NOI for a nonroad engine, the notice must include all the information required by WAC 173-400-035(4) or (5), as applicable;
  - (4) Any additional information requested by the Agency to verify that operation of the stationary source will comply with applicable air pollution control requirements; and,
  - (5) Applicable fee per Rule 3.6.
- (e) Condition of operation. The Agency may establish enforceable conditions of operation, through issuance of a regulatory Order, as are necessary to assure compliance with applicable air pollution control requirements.
- (f) Temporary Portable Stationary Sources - Requirements for Operation. Sources submitting a Notice of Intent per Rule 6.4(a)(1) must meet the following requirements:
  - (1) The operation must not cause a violation of ambient air quality standards;
  - (2) If the operation is in a nonattainment area, it must not interfere with the scheduled attainment of ambient standards;
  - (3) The temporary source must operate in compliance with all applicable air pollution rules and regulations;
  - (4) A temporary portable stationary source that is considered a major stationary source within the meaning of WAC 173-400-710 or WAC 173-400-810 must also comply with the requirements in WAC 173-400-700



through 750 and WAC 173-400-800 through 860 and Rule 6.1.3(b) as applicable;

- (5) Any operating condition in an Order previously issued to a temporary source will remain in effect upon relocating the source within ORCAA's jurisdiction unless specifically superseded by condition in a subsequent Order.
  
- (g) Where work, for which a Notice of Intent to Operate is required, is commenced prior to making application and receiving approval, the Executive Director, or an authorized agent, may investigate as part of the Notice of Intent review. In such a case, an investigation fee, in addition to fees of Rule 3.3, may be assessed in an amount up to 3 times the Notice of Intent fees of Rule 3.3. Payment of the fees does not relieve any person from the requirement to comply with the regulations nor from any penalties for failure to comply.

[Adopted 02/26/22]

## **REGULATION 7 – PROHIBITIONS**

### **RULE 7.1 INTERFERENCE OR OBSTRUCTION**

It is unlawful for any person to willfully interfere with or obstruct the Executive Director or any Agency employee in performing any lawful duty.

[Adopted 08/17/06; Amended 02/26/22]

### **RULE 7.2 FALSE OR MISLEADING STATEMENTS**

It is unlawful for any person to willfully make a false or misleading statement to the Board or its representative as to any matter within the jurisdiction of the Board.

[Adopted 08/17/06; Amended 02/26/22]

### **RULE 7.3 UNLAWFUL REPRODUCTION OR ALTERATION OF DOCUMENTS**

It is unlawful for any person to reproduce or alter, or cause to be reproduced or altered, any order, registration certificate or other paper issued by the Agency if the purpose of such reproduction or alteration is to evade or violate any provision of these Regulations or any other law.

[Adopted 08/17/06; Amended 02/26/22]

### **RULE 7.4 DISPLAY OF ORDERS AND CERTIFICATES: REMOVAL OR MUTILATION PROHIBITED**

- (a) Any order or registration certificate required to be obtained by these Regulations must be available on the premises designated on the order or certificate.
- (b) If the Agency requires an order or registration certificate to be displayed, it must be posted.
- (c) It is unlawful for any person to mutilate, obstruct or remove any order or registration certificate unless authorized to do so by the Board or the Executive Director.

[Adopted 08/17/06; Amended 02/26/22]

### **RULE 7.5 EMISSION OF AIR CONTAMINANT – CONCEALMENT AND MASKING**

- (a) It is unlawful for any person to cause or allow the installation or use of any device or use of any means, which conceals or masks an emission of air contaminant, which would otherwise violate any provisions of ORCAA's Regulations or chapter 173-400 WAC.
- (b) It is unlawful for any person to cause or allow the installation or use of any device or use of any means designed to conceal or mask the emission of an air contaminant, which causes detriment to health, safety, or welfare of any person, or cause damage to property or business.

[Adopted 08/17/06; Amended 02/26/22]

### **RULE 7.6 EMISSIONS OF AIR CONTAMINANT OR WATER VAPOR: DETRIMENT TO PERSONS AND/OR PROPERTY**

It is unlawful for any person to cause or allow the emission of an air contaminant or water vapor, including an air contaminant whose emission is not otherwise prohibited by these

Regulations, if the air contaminant or water vapor causes detriment to the health, safety, or welfare of any person, or causes damage to property or business.  
[Adopted 08/17/06; Amended 02/26/22]

## REGULATION 8 – PERFORMANCE STANDARDS

### RULE 8.1 WOOD HEATING

The provisions of this rule apply to solid fuel burning devices in all areas within the jurisdiction of Olympic Region Clean Air Agency (ORCAA).

[Adopted 08/17/06; Amended 05/22/10]

#### ***Rule 8.1.1 Definitions***

**“Adequate Source of Heat”** means a furnace or heating system, connected, or disconnected from its energy source, designed with the ability to maintain seventy degrees Fahrenheit (70°F) at a point three (3) feet above the floor in all normally inhabited areas of a dwelling. Garages are specifically excluded.

**“Certified”** means that a woodstove meets emission performance standards when tested by an accredited independent laboratory and labeled according to procedures specified by EPA in 40 CFR Part 60 Subpart AAA-Standards of Performance for Residential Wood Heaters as amended through July 1, 1990.

**“Cook Stove”** means an appliance designed with the primary function of cooking food and containing an integrally built-in oven, with an internal temperature indicator and oven rack, around which the fire is vented, as well as a shaker grate ash pan, and an ash cleanout below the firebox. Any device with a fan or heat channels used to dissipate heat into the room is not considered a cook stove.

**“Fireplace”** means a permanently installed masonry fireplace; or a factory-built metal solid fuel burning device designed to be used with an open combustion chamber and without features to control the air to fuel ratio.

**“First Stage of Impaired Air Quality”** means the same as Stage 1 burn ban and is declared when meteorological conditions are predicted to cause fine particulate levels to exceed 35 micrograms per cubic meter measured on a 24-hour average, within 48 hours.

**“Second Stage of Impaired Air Quality”** means the same as Stage 2 burn ban and is declared when a first stage of impaired air quality has been in force and has not been sufficient to reduce the increasing fine particulate pollution trend. A second stage burn ban may be called without calling a first stage burn ban only when all the following occur:

- (a) Fine particulate levels have reached or exceeded 25 micrograms per cubic meter, measured on a 24-hour average;
- (b) Meteorological conditions have caused fine particulate levels to rise rapidly;
- (c) Meteorological conditions are predicted to cause fine particulate levels to exceed the 35 micrograms per cubic meter, measured on a 24-hour average, within 24 hours; and,
- (d) Meteorological conditions are highly likely to prevent sufficient dispersion of fine particulate.

**“Nonaffected Pellet Stove”** means that a pellet stove has an air-to-fuel ratio equal to or greater than 35.0 when tested by an accredited laboratory in accordance with methods and procedures specified by the EPA in 40 CFR Part 60 Appendix A, Reference Method 28A-Measurement of Air to Fuel Ratio and minimum achievable burn rates for wood fired appliances as amended through July 1, 1990.

**“Salt Laden Wood”** means any species of wood that has been soaked in salt water.

**“Seasoned Wood”** means clean, untreated wood of any species that has been dried and contains twenty percent (20%), or less, moisture by weight.

**“Solid Fuel Burning Device”** means a device that burns seasoned wood, coal, or any other nongaseous or nonliquid fuels except those prohibited by Rule 8.1.3. This also includes devices used for aesthetic or a space heating purpose, which has heat input less than one million British thermal units per hour. A cook stove is specifically excluded from this definition.

**“Treated Wood”** mean wood of any species that has been chemically impregnated, painted, or similarly modified to improve structural qualities or resistance to weathering or deterioration.

**“Woodstove”** means an enclosed solid fuel burning device capable of and intended for space heating and/or domestic water heating.

[Adopted 08/17/06; Amended 05/22/10; 02/26/22]

### ***Rule 8.1.2 General Emission Standards***

- (a) It is unlawful for any person to cause or allow an emission from a solid fuel burning device that unreasonably interferes with the use and enjoyment of property or workplace.
- (b) It is unlawful for any person to cause or allow emission of a smoke plume from any solid fuel burning device to exceed an average of twenty percent (20%) opacity as determined by EPA Method 9. The provision of this requirement will not apply during the starting of a new fire for a period not to exceed 20 minutes in any 4-hour period.
- (c) Smoke visible from a chimney, flue, or exhaust duct, in excess of the opacity standard will constitute prima facie evidence of unlawful operation of an applicable solid fuel burning device. This presumption may be refuted by demonstration that the smoke was not caused by an applicable solid fuel burning device.

[Adopted 08/17/06; Amended 05/22/10; 02/26/22]

### ***Rule 8.1.3 Prohibited Fuel Types***

It is unlawful for any person to cause or allow any of the following materials to be burned in a solid fuel burning device:

- (a) Garbage;
- (b) Treated wood;

- (c) Plastic products;
- (d) Rubber products;
- (e) Animals;
- (f) Asphalt products;
- (g) Petroleum products;
- (h) Paints and chemicals;
- (i) Salt laden wood; or
- (j) Any substance that normally emits dense smoke or obnoxious odors.

[Adopted 08/17/06; Amended 05/22/10; 02/26/22]

#### ***Rule 8.1.4 Curtailment***

- (a) Whenever the Agency has declared a Stage 1 burn ban for a geographic area, a person within that geographic area with an adequate source of heat other than a solid fuel burning device must not operate any solid fuel burning device, unless the solid fuel burning device is one of the following:
  - (1) Certified; or
  - (2) A nonaffected pellet stove.
- (b) Whenever the Agency has declared a Stage 2 burn ban for a geographic area, a person within that geographical area with an adequate source of heat other than a solid fuel burning device must not operate any solid fuel burning device.
- (c) The affected geographic area of a declared Impaired Air Quality will be determined by the Executive Director or their designee.
- (d) A person responsible for an applicable solid fuel burning device already in operation at the time Impaired Air Quality is declared must withhold new solid fuel for the duration of the Impaired Air Quality. Smoke visible from a chimney, flue, or exhaust duct after three hours has elapsed from the declaration of the Impaired Air Quality will constitute prima facie evidence of unlawful operation of an applicable solid fuel burning device. This presumption may be refuted by demonstration that the smoke was not caused by a solid fuel burning device.
- (e) For the sole purpose of a contingency measure to meet the requirements of Section 172(c)(9) of the Federal Clean Air Act, the use of solid fuel burning devices, except fireplaces as defined in RCW 70A.15.3510(3), woodstoves meeting the standards set forth in RCW 70A.15.3530 or pellet stoves either certified or issued an exemption by the EPA in accordance with Title 40, Part 60 of the Code of Federal Regulations will be prohibited if the EPA, in consultation with Ecology and the Agency, makes written findings that:
  - (1) The area has failed to make reasonable further progress or attain or maintain a national ambient air quality standard; and,
  - (2) Emissions from solid fuel burning devices from a geographic area are a contributing factor to such failure to make reasonable further progress or attain or maintain a national ambient air quality standard.
  - (3) A prohibition issued under 8.1.4(e) will not apply to a person that does not have an adequate source of heat without burning wood.

- (4) The area is to consist of all areas within the city limits of Lacey, Olympia, and Tumwater and unincorporated areas of Thurston County lying within or between the municipal boundaries.

[Adopted 08/17/06; Amended 05/22/10; 02/26/22]

### ***Rule 8.1.5 Exemptions***

Written exemptions granted by the Agency are valid for one (1) year from date of issue. Exemptions may be canceled at any time if the original request is found to be incorrect, inaccurate, or fraudulent. Exemptions will apply only to the use of solid fuel burning device during an Impaired Air Quality and not to the other rules of this regulation or other applicable regulations.

- (a) Emergency exemption. In an emergency the Agency may issue a written solid fuel burning device emergency exemption. An emergency may include, but is not limited to, a situation where a person demonstrates that their heating system, other than a solid fuel heating device, is inoperable for reasons other than their own actions or a situation where the heating system has been involuntarily disconnected by a utility company or other fuel supplier.
- (b) Inadequate heat source. Written exemptions may be issued by the Agency if a person can demonstrate that:
- (1) The structure was originally designed with a solid fuel burning device as the source of heat; or
- (2) The existing heat source, fueled with other than solid fuel, will not provide adequate heat.

[Adopted 08/17/06; Amended 05/22/10; 02/26/22]

### ***Rule 8.1.6 Penalties***

A person in violation of this Rule 8.1 may be subject to the provisions of Rule 2.5.

[Adopted 08/17/06; Amended 05/22/10]

### ***Rule 8.1.7 Sale and Installation of Uncertified Woodstoves***

It is unlawful to install, sell, offer for sale, advertise for sale, or otherwise transfer an uncertified solid fuel burning device unless the device has been rendered permanently inoperable as a combustion device.

[Adopted 08/17/06; Amended 05/22/10; 02/26/22]

### ***Rule 8.1.8 Disposal of Uncertified Woodstoves***

When an uncertified solid fuel burning device is to be permanently removed from its location it must be rendered inoperable as a solid fuel burning device. A removed uncertified solid fuel burning device must not be sold, bartered, traded, or given away for a purpose other than recycling of the materials to form something other than an uncertified solid fuel burning device.

[Adopted 08/17/06; Amended 05/22/10; 02/26/22]

## **RULE 8.2 GENERAL STANDARDS FOR MAXIMUM VISUAL EMISSIONS**

All facilities, sources and emissions units are required to meet the visual emission standards of this rule except when a visual emission standard is listed in another rule of these Regulations, or where a Notice of Construction lists a more stringent visual emission standard, or where an applicable State of Washington or Federal Regulation lists a visual emission standard that is more stringent, such standards will take precedent over a general emission standard listed in this rule.

- (a) In equipment or facilities, including boilers using hogged fuel, regardless of their date of installation, it is unlawful for any person to cause or allow the emission to the outdoor atmosphere, for more than three (3) minutes in any one hour, of a gas stream containing air contaminants that are greater than 20% opacity.
- (b) Observations must be made by trained and certified observers or by LIDAR instrumentation.
- (c) The exceptions to Rule 8.2 are as follows:
  - (1) Emission occurring due to soot blowing or grate cleaning may be greater than 20% opacity; providing the operator can demonstrate that soot blowing, or grate cleaning will not exceed a total of 15 minutes in any 8 consecutive hours. This practice, except for testing and troubleshooting, is to be scheduled for the same approximate times each day and ORCAA must be advised of the schedule.
  - (2) When the owner or operator of a source supplies valid data to show that the presence of uncombined water is the only reason for the opacity to exceed 20%.

[Adopted 08/17/06; Amended 02/26/22]

## **RULE 8.3 GENERAL STANDARDS FOR MAXIMUM PARTICULATE MATTER**

All sources and emission units are required to meet the emission standards of this rule, except when a standard is listed in another rule of these Regulations, or where a Notice of Construction Approval Order lists a more stringent standard, or where an applicable State of Washington or Federal Regulation lists a standard that is more stringent, such standards will take precedent over a general emission standard listed in this rule. Further, all existing emission units are required to use reasonably available control technology (RACT), which may be determined for some sources or source categories to be more stringent than the applicable emission limitations of ORCAA Regulations. When current controls are determined to be less than RACT, ORCAA will, on a case-by-case basis, define RACT for each source or source category and issue a regulatory order to the source or source category for installation of RACT. Particulate test procedures, on file at the Authority, will be used to determine compliance. The Agency requires the inclusion of condensable particulate matter, for determining compliance with the particulate matter standards in this rule.

- (a) In equipment or facilities, except boilers using hog fuel, it is unlawful for any person to cause or allow the emission of particulate matter to the outdoor atmosphere from any single source in excess of 0.10 grains per standard cubic



- foot of gas (calculated at 7% oxygen). Particulate test procedures, on file at the Agency, will be used to determine compliance.
- (b) Hogged Fuel Boilers: It is unlawful for any person to cause or allow the emission of particulate matter to the outdoor atmosphere from any single source in excess of 0.20 grains per standard cubic foot of gas (calculated at 7% oxygen). Particulate test procedures, on file at the Agency, will be used to determine compliance.
  - (c) Fugitive particulate material. Reasonable and/or appropriate precautions must be taken to prevent fugitive particulate material from becoming airborne;
    - (1) When handling, loading, unloading, transporting, or storing particulate material; or,
    - (2) When constructing, altering, repairing, or demolishing a building; or its appurtenance; or a road; or,
    - (3) From an untreated open area.

For this rule, fugitive particulate means particulate material which is generated incidental to an operation, process or procedure and is emitted into the open air from points other than an opening designed for emissions such as stacks or vents.

- (d) It is unlawful for any person to cause or allow any construction, alteration, repair, maintenance, or demolition work without taking precautions to prevent air pollution.
- (e) Fallout. It is unlawful for any person to cause or permit the emission of particulate matter from any source to be deposited beyond the property under direct control of the owner(s) or operator(s) of the source which interferes unreasonably with the use and enjoyment of the property upon which the material is deposited.

[Adopted 08/17/06; Amended 02/26/22]

#### **RULE 8.4 INCINERATION OPERATION**

- (a) It is unlawful for any person to cause or allow any incineration operation within the Agency's jurisdiction except in an incinerator provided with emission control apparatus found by the Executive Director, or a duly designated agent, in advance of such use, to be effective for air pollution control.
- (b) Operating Hours. It is unlawful for any person to cause or allow an incineration operation at any time other than daylight hours of the same day, except with written approval of the Executive Director.

[Adopted 08/17/06; Amended 02/26/22]

#### **RULE 8.5 ODOR CONTROL MEASURES**

- (a) Reasonably available control technology (RACT) must be installed and operated to mitigate odor-bearing gases emitted into the atmosphere to a minimum, or, so as not to create air pollution.
- (b) The Board may establish requirements that the building or equipment be enclosed and ventilated in such a way that all the air, gases and particulate matter are effectively treated for removal or destruction of odorous matter or other air contaminants before emission to the outdoor atmosphere.

- (c) It is unlawful for any person to cause or allow the emission or generation of any odor from any source, which unreasonably interferes with another person's use, and enjoyment of their property.

[Adopted 08/17/06; Amended 02/26/22]

#### **RULE 8.6 EMISSION OF TOXIC AIR POLLUTANTS**

- (a) Sources installed after June 18, 1991, must meet the requirements of chapter 173-460 WAC, New Sources of Toxic Air Pollutants. For sources installed after June 18, 1991, "Toxic Air Pollutant (TAP)" means any toxic air pollutant listed in WAC 173-460-150
- (b) No person shall cause or allow the emission of formaldehyde into the ambient air beyond such person's property line, which will result in a concentration exceeding .05 ppm (parts per million) 1 hour average or 61 micrograms per cubic meter 1 hour average.

[Adopted 08/17/06; Amended 02/26/22]

#### **RULE 8.7 REPORTING OF EXCESS EMISSIONS**

- (a) Excess emission must be reported to the Agency as soon as possible and within 24 hours unless the Agency has established alternative reporting timeline requirements for the source. Upon request by the Executive Director, the owner(s), or operator(s), of the source(s) must submit a full written report including the known causes, the corrective actions taken, and the preventative measures to be taken to minimize or eliminate the chance of recurrence.
- (b) The owner or operator of a source has the burden of proving to the Agency that excess emissions were unavoidable.
- (c) The following scenarios of excess emissions will be considered unavoidable:
  - (1) Excess emissions due to startup or shutdown conditions will be considered unavoidable provided the source reports as required under Rule 8.7(a) and adequately demonstrates the excess emissions could not have been prevented through careful planning and design and if a bypass of control equipment occurs, that such bypass is necessary to prevent loss of life, personal injury, or severe property damage.
  - (2) Excess emissions due to scheduled maintenance will be considered unavoidable if the source reports as required under Rule 8.7(a) and could not have been avoided through better design, scheduling for maintenance, or through better operation and maintenance practices.
  - (3) Excess emissions due to upsets will be considered unavoidable provided the source reports, as required under Rule 8.7(a), and demonstrates:
    - (i) The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition;
    - (ii) The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance; and
    - (iii) The operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during and after the event, including slowing

or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded.

[Adopted 08/17/06; Amended 02/26/22]

#### **RULE 8.8 CONTROL EQUIPMENT – MAINTENANCE AND REPAIR**

All air contaminant sources are required to keep any process and/or air pollution control equipment in good operating condition and repair.

[Adopted 08/17/06]

#### **RULE 8.9 BURNING USED OIL IN LAND BASED FACILITIES**

(RCW 70A.15.4510)

- (a) Except as provided in Rule 8.9(b), a person may not burn used oil as fuel in a land-based facility or in state waters unless the used oil meets the following standards:
  - (1) Cadmium – 2 ppm maximum
  - (2) Chromium – 10 ppm maximum
  - (3) Lead – 100 ppm maximum
  - (4) Arsenic – 5 ppm maximum
  - (5) Total Halogens – 1000 ppm maximum
  - (6) Polychlorinated Biphenyls – 2 ppm maximum
  - (7) Ash - .1 percent maximum (0.1%)
  - (8) Sulfur – 1.0 percent maximum (1%)
  - (9) Flash point – 100 degrees Fahrenheit minimum (100°F)
- (b) This rule does not apply to:
  - (1) Used oil burned in space heaters if the space heater has a maximum heat output of not greater than 0.5 million BTUs per hour or used oil burned in facilities permitted by the Agency; or
  - (2) Ocean going vessels.
- (c) This rule does not apply to persons in the business of collecting used oil from residences when under authorization by a city, county, or the utilities and transportation commission.

Test procedures for determining compliance for the above specifications must be approved by the Agency.

[Adopted 08/17/06; Amended 02/26/22]

#### **RULE 8.10 FLUORIDES**

- (a) The following standards apply to forage:
  - (1) After sampling monthly, the yearly average fluoride content of the forage should not exceed 40 ppm Fluoride ion (ppm F), on a dry weight basis, or

exceed 60 ppm F for more than two (2) consecutive months or exceed 80 ppm F for more than one (1) month.

- (2) In areas where cattle are not grazed continually but are fed cured forage, as hay, for part of the year, the fluoride content of this hay will be used as it is fed to establish the yearly average. Computation of the yearly average, must take into consideration, periods when cattle may have been grazed outside the area.
- (3) Inasmuch as the standards set forth in paragraph (1) are intended to protect livestock, all forage samples analyzed to determine compliance with such standards must be representative of forage consumed by livestock in the area. Also, in determining compliance in particular cases, consideration will be given to the supplemental feed of the livestock involved.

- (b) The following standards apply to the outdoor atmosphere:

**Table 8.10a Maximum Allowable Fluoride**

| Maximum Allowable Fluoride*<br>Ground-level Concentrations |                      |
|------------------------------------------------------------|----------------------|
| Concentration**                                            | Averaging Time       |
| 4.5 ppb                                                    | 12 consecutive hours |
| 3.5 ppb                                                    | 24 consecutive hours |
| 2.0 ppb                                                    | 1 calendar year      |
| 1.0 ppb                                                    | 1 calendar month     |
| * as gaseous fluorides calculated as HF                    |                      |
| ** parts per billion by volume                             |                      |

Because the standards set forth in Table 8.10 are intended to protect vegetation, the outdoor atmosphere analyzed to determine compliance with such standards must be from the area of the vegetation to be protected.

- (c) Forage or air quality levels higher than those specified in paragraph (1) and Table 8.10 will be permitted to exist in an area where justified by local conditions and where such higher levels do not or will not be expected to result in significant adverse effects. Similarly, levels lower than those specified in paragraph (1) and Table 8.10 will be maintained in cases where significant adverse effects have occurred or can be expected to occur at the specified levels.

[Adopted 08/17/06; Amended 02/26/22]

#### **RULE 8.11 RECORD KEEPING AND REPORTING**

This rule requires owners or operators of stationary sources of air contaminants to maintain records of, and periodically report to the Olympic Region Clean Air Agency information on the nature and amounts of emissions and other information as may be necessary to determine whether such sources are in compliance with applicable emission limitations and other control measures.

This rule also provides for public availability of emission data reported to the Olympic Region Clean Air Agency by stationary source owners or operators or otherwise obtained by the Agency, as correlated with applicable emission limitations.

- (a) The owner or operator of any stationary source in the geographical area of the Authority must, upon notification by the Executive Director, maintain records of the nature and amounts of emissions from such source and/or provide other information deemed necessary by the Control Officer to determine whether such source is in compliance with the applicable emission limitations and other control measures.
- (b) When requested by the Agency, the information pursuant to Rule 8.11(a) must be reported on forms supplied by the Agency.

[Adopted 08/17/06; Amended 02/26/22]

## **RULE 8.12 GASOLINE DISPENSING FACILITIES**

This regulation applies to all gasoline dispensing facilities.

[Adopted 08/17/06; Amended 08/17/19]

### ***Rule 8.12.1 Definitions***

Unless a different meaning is clearly required by context, the following words and phrases, as used in this Rule, will have the following meanings:

**“CARB”** means California Air Resources Board.

**“CARB Certified”** means a vapor recovery system, equipment, or any component thereof, for which the California Air Resources Board (CARB) has evaluated its performance and issued an Executive Order.

**“CARB Executive Order”** means a document issued by the Executive Officer of the California Air Resources Board that specified the requirements for specific vapor control equipment and the procedures used in installing, maintaining, inspecting, or testing vapor recovery systems.

**“Enhanced Vapor Recovery (EVR)”** means performance standards and specifications set forth in the CARB CP 201 (Certification Procedure for Vapor Recovery Systems at gasoline dispensing facilities) Sections 3 through 9.

**“Gasoline”** means a petroleum distillate, which is a liquid at standard conditions and has a true vapor pressure greater than four pounds per square inch absolute at 20°C and is used as a fuel for internal combustion engines. Any liquid sold as a vehicle fuel with a true vapor pressure greater than four pounds per square inch absolute at 20°C is considered ‘gasoline’ in this regulation.

**“Gasoline Dispensing Facility”** means any site dispensing gasoline from stationary storage tanks including facilities dispensing gasoline for automotive, aviation, and marine uses.

**“Stage I”** means gasoline vapor recovery during all gasoline marketing transfer operations except motor vehicle refueling.

**“Stage II”** means gasoline vapor recovery during motor vehicle refueling operations from stationary tanks.

**“Submerged Fill Line”** means any discharge pipe or nozzle designed to be within six (6) inches of the bottom of the tank and submerged at all times.

**“Throughput”** means the amount of gasoline passing through a facility.

**“Vapor Recovery System”** means equipment that reduces the emissions of volatile organic compounds to the ambient air.

[Adopted 08/17/06; Amended 08/17/19; 02/26/22]

### ***Rule 8.12.2 General Requirements***

- (a) All gasoline dispensing facilities with gasoline storage tanks, regardless of size must:
  - (1) Not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:
    - (i) Minimize gasoline spills;
    - (ii) Clean up spills as soon as practicable;
    - (iii) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; and
    - (iv) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.
- (b) Gasoline storage tanks with a capacity of 2,000 gallons or more must be equipped with submerged fill lines.
- (c) Gasoline dispensing facilities may be subject to registration per Rule 4.1.
- (d) Gasoline dispensing facilities may be subject to Notice of Construction requirements per Rule 6.1.

[Adopted 08/17/06; Amended 08/17/19; 02/26/22]

### ***Rule 8.12.3 Vapor Recovery Requirements***

- (a) CARB Certified Stage I Enhanced Vapor Recovery (EVR), or equivalent equipment as approved by the Agency, is required for any new or upgraded gasoline storage tank with a storage capacity of 2,000 gallons or more and located at a gasoline dispensing facility with a cumulative gasoline storage capacity of 10,000 gallons or more. Upgrading means replacing a gasoline storage tank, or substantially altering any component of the Stage I vapor recovery system. Prior to commencing construction, modifications, or upgrades, gasoline dispensing facilities must comply with the applicable requirements in Rule 6.1.

- (b) Nothing in Rule 8.12 precludes the Agency from requiring installation of a Stage II vapor recovery system in conjunction with approval of a Notice of Constructing application if Stage II vapor recovery is necessary to assure compliance with applicable air regulations and standards.

[Adopted 08/17/06; Amended 08/17/19]

#### ***Rule 8.12.4 Testing Requirements***

- (a) The owner or operator of a gasoline dispensing facility with a cumulative storage capacity of 10,000 gallons or more and equipped with Stage I EVR must conduct the following performance tests:
  - (1) Initial performance testing must be completed, for all performance tests listed in Table 1, after initial installation and prior to the facility dispensing fuel commercially; and,
  - (2) Subsequent testing must be conducted according to the schedule in Table 1.
- (b) The owner or operator of a gasoline dispensing facility with a cumulative gasoline storage capacity of 10,000 gallons or more that is equipped with Stage I, but not equipped with Stage I EVR, must conduct the appropriate Static Pressure Performance of Vapor Recovery Systems test in Table 1 at least once every 13 months.
- (c) Tests must be conducted in accordance with the CARB test procedure specified, or CARB-approved equivalent test procedures.
- (d) Tests must be performed by a third-party independent testing company trained in the testing methods.
- (e) In the event of a failed performance test, the owner or operator must correct the cause of the failure in accordance with Rule 8.12.5(c) and retest within 30 days of the date of the failed test.
- (f) The owner or operator must report to the Agency the results of all required performance testing within 30 days of the test date.

**Table 1: Performance Testing**

|          |                                                                                                                                                  |                                                                                           |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
| <b>A</b> | <b>An owner/operator of a facility with underground storage tanks must conduct the following tests...</b>                                        | <b>After the initial testing, the owner/operator must conduct the subsequent tests...</b> |
|          | <b>A1. TP-201.3</b> – Static Pressure Performance of Vapor Recovery Systems                                                                      | at least once every 13 months                                                             |
|          | <b>A2. TP-201.1E</b> – Leak Rate and Cracking Pressure of P/V Vent Valves                                                                        | at least once every 37 months                                                             |
|          | <b>A3. TP-201.3C</b> – Determination of Vapor Piping Connection to Underground Gasoline Storage Tanks (Tie-Tank Test)                            |                                                                                           |
|          | <b>A4. TP-201.1B</b> – Static Torque of Rotatable Stage I Adaptors                                                                               | at least once every 13 months                                                             |
|          | <b>A5. TP-201.1C or TP-201.1D<sup>1</sup></b> – Leak Rate of Drop Tube/Drain Valve Assembly or Leak Rate of Drop Tube/Overfill Prevention Device | at least once every 13 months                                                             |
| <b>B</b> | <b>An owner/operator with aboveground storage tanks must conduct the following tests...</b>                                                      | <b>After the initial testing, the owner/operator must conduct the subsequent tests...</b> |
|          | <b>B1. TP-206.3 or TP-201.3B<sup>2</sup></b> – Static Pressure Performance of Vapor Recovery Systems                                             | at least once every 13 months                                                             |
|          | <b>B2. TP-201.1B</b> – Static Torque of Rotatable Stage I Adaptors <sup>3</sup>                                                                  | at least once every 13 months                                                             |
|          | <b>B3. TP-201.1E</b> – Leak Rate and Cracking Pressure of P/V Vent Valves                                                                        | at least once every 37 months                                                             |

[Adopted 08/17/06; Amended 08/17/19; 02/26/22]

<sup>1</sup> TP-201.1C has no overfill prevention device and TP-201.1D is required for drop tubes with overfill prevention

<sup>2</sup> TP-206.3 is required for aboveground storage tanks equipped with Stage I EVR

<sup>3</sup> TP-201.1B only required for aboveground storage tanks equipped with Rotatable Stage I Adaptors



### ***Rule 8.12.5 Self-Inspection Requirements***

- (a) The owner or operator of a gasoline dispensing facility must complete self-inspections of the vapor recovery system. The inspection must occur at least once a week, or after each gasoline delivery, whichever is less frequent. At a minimum, the following items must be inspected:
  - (1) All adaptors must be equipped with vapor-tight caps;
  - (2) All fill and vapor recovery wells or boxes must be free of liquid gasoline;
  - (3) All gasoline storage tank fill-pipes must have gasketed seals in good working condition;
  - (4) All caps must have gasketed seals in good working condition; and,
  - (5) Vapor recovery adaptors on the storage tanks must seal upon disconnect.
- (b) The dates and results of the self-inspections must be recorded.
- (c) No later than 15 days after discovery, the owner or operator must take corrective actions to repair, replace, or adjust defective equipment found during any of the following events:
  - (1) Performance tests;
  - (2) Routine maintenance checks;
  - (3) Self-inspections; or,
  - (4) Agency compliance inspections.

[Adopted 08/17/06; Amended 08/17/19; 02/26/22]

### ***Rule 8.12.6 Recordkeeping Requirements***

- (a) The following records must be maintained on site for no less than five years from origination, and copies made available to the Agency upon request:
  - (1) Records of all maintenance and repair activities;
  - (2) Records of all self-inspections conducted per Rule 8.12.5;
  - (3) Records of all performance tests required by Rule 8.12.4; and,
  - (4) Monthly gasoline throughput records.
- (b) The following records must be maintained on site for the life of the gasoline dispensing facility or the associated equipment, whichever is earlier:
  - (1) Any determinations issued by the Agency per Rule 6.1;
  - (2) Any GDF Notice of Intent to Operate submitted to the Agency per Rule 6.1(b)(3).

[Adopted 08/17/19; Amended 02/26/22]

### **RULE 8.13 (RESERVED)**

### **RULE 8.14 ADOPTION OF FEDERAL NEW SOURCE PERFORMANCE STANDARDS (NSPS)**

- (a) The NSPS in 40 CFR Part 60 and its Appendices in effect on the date referenced in ORCAA Rule 1.11 are adopted by reference except for the subparts and sections listed in subsection (4). A current list of adopted federal standards is provided in Appendix A of ORCAA's Regulation.

- (1) The term “Administrator” in 40 CFR Part 60 means the Administrator of EPA and the Executive Director of the Agency.
- (2) Where EPA has delegated to the Agency the authority to receive reports under 40 CFR Part 60 the affected facility is required to provide such reports only to the Agency, unless otherwise requested in writing by EPA.
- (3) This section does not apply to any source operating under a waiver granted by EPA or an exemption granted by the president of the United States.
- (4) Exceptions. The following sections and subparts of 40 CRF Part 60 are not adopted:
  - (i) Subpart B – Adoption and Submittal of State Plans for Designated Facilities;
  - (ii) Subpart C – Emission Guidelines and Compliance Times;
  - (iii) Subpart Cb – Large Municipal Waste Combustors that are Constructed on or before September 20, 1994 (Emission Guidelines and Compliance Times);
  - (iv) Subpart Cc – Municipal Solid Waste Landfills (Emission Guidelines and Compliance Times);
  - (v) Subpart Cd – Sulfuric Acid Production Units (Emission Guidelines and Compliance Times);
  - (vi) Subpart Ce – Hospital/Medical/Infectious Waste Incinerators (Emission Guidelines and Compliance Times);
  - (vii) Subpart S – Primary Aluminum Reduction Plants;
  - (viii) Subpart BB – Kraft Paper Mills;
  - (ix) Subpart AAA – New Residential Wood Heaters – as it applies to non-Title V sources;
  - (x) Subpart BBBB - Small Municipal Waste Combustion Units Constructed on or before August 30, 1999 (Emission Guidelines and Compliance Times);
  - (xi) Subpart DDDD - Commercial and Industrial Solid Waste Incineration Units that Commenced Construction on or before November 30, 1999 (Emission Guidelines and Compliance Times);
  - (xii) Subpart FFFF - Emission Guidelines and Compliance Times for Other Solid Waste Incineration Units that Commenced Construction on or before December 9, 2004;
  - (xiii) Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines - as it applies to non-Title V sources;
  - (xiv) Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines - as it applies to non-Title V sources;
  - (xv) Subpart MMMM - Emission Guidelines and Compliance Times for Existing Sewage Sludge Incineration Units;
  - (xvi) Subpart QQQQ – Standards of Performance for New Residential Hydronic Heaters and Forced-Air Furnaces - as it applies to non-Title V sources;

- (xvii) Subpart UUUU - Emission Guidelines for Greenhouse Gas Emissions and Compliance Times for Electric Utility Generating Units; and,
- (xviii) Appendix G - Provisions for an Alternative Method of Demonstrating Compliance with 40 CFR 60.43 for the Newton Power Station of Central Illinois Public Service Company.

[Adopted 08/17/06; Amended 10/29/16; 02/26/22]

#### **RULE 8.15 ADOPTION OF NATIONAL EMISSIONS STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP)**

- (a) The NESHAP in 40 CFR Part 61 and its Appendices in effect on the date referenced in ORCAA Rule 1.11 are adopted by reference except for the subparts and sections listed in subsection (4). A current list of adopted federal standards is provided in Appendix A of ORCAA's Regulation.
  - (1) The term "Administrator" in 40 CFR Part 61 means the Administrator of EPA and the Executive Director of the Agency.
  - (2) Where EPA has delegated to the Agency the authority to receive reports under 40 CFR Part 61 the affected facility is required to provide such reports only to the Agency, unless otherwise requested in writing by EPA.
  - (3) This section does not apply to any source operating under a waiver granted by EPA or an exemption granted by the president of the United States.
  - (4) Exceptions. The following sections and subparts of 40 CFR Part 61 are not adopted:
    - (i) Subpart B - Radon from Underground Uranium Mines;
    - (ii) Subpart H - Radionuclide other than Radon from Dept. of Energy Facilities;
    - (iii) Subpart I - Radionuclide from Federal Facilities other than Nuclear Regulatory Commission Licensees and not covered by Subpart H;
    - (iv) Subpart K - Radionuclide from Elemental Phosphorus Plants;
    - (v) Subpart Q - Radon from Dept. of Energy Facilities;
    - (vi) Subpart R - Radon from Phosphogypsum Stacks;
    - (vii) Subpart T - Radon from Disposal Uranium Mill Tailings; and,
    - (viii) Subpart W - Radon from Operating Mill Tailings.

[Adopted 08/17/06; Amended 10/29/16; 02/26/22]

#### **RULE 8.17 ADOPTION OF NATIONAL EMISSIONS STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES**

- (a) The NESHAP for Source Categories in 40 CFR Part 63 and its Appendices in effect on the date referenced in ORCAA Rule 1.11 are adopted by reference except for the subparts and sections listed in subsection (4). A current list of adopted federal standards is provided in Appendix A of ORCAA's Regulation.
  - (1) The term "Administrator" in 40 CFR Part 63 means the Administrator of EPA and the Executive Director of the Agency.

- (2) Where EPA has delegated to the Agency the authority to receive reports under 40 CFR Part 63 the affected facility is required to provide such reports only to the Agency, unless otherwise requested in writing by EPA.
- (3) This section does not apply to any source operating under a waiver granted by EPA or an exemption granted by the president of the United States.
- (4) Exceptions. The following sections and subparts of 40 CFR Part 63, as they apply to non-Title V sources, are not adopted:
  - (i) Subpart M - National Perchloroethylene Emission Standards for Dry Cleaning Facilities;
  - (ii) Subpart LL - National Emission Standard for Hazardous Air Pollutants for Primary Aluminum Reduction Plants;
  - (iii) Subpart RRR - National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production;
  - (iv) Subpart ZZZZ - Stationary Reciprocating Internal Combustion Engines;
  - (v) Subpart - BBBBBB National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities;
  - (vi) Subpart HHHHHH - Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources; and,
  - (vii) Subpart XXXXXX - Area Source Standards for Nine Metal Fabrication and Finishing Source Categories.

[Adopted 10/29/16; Amended 02/26/22]

#### **RULE 8.18 ADOPTION OF FEDERAL CONSOLIDATED REQUIREMENTS FOR THE SYNTHETIC ORGANIC CHEMICAL MANUFACTURING INDUSTRY**

The Consolidated Requirements for the Synthetic Organic Chemical Manufacturing Industry in Section 2.18 of 40 CFR Part 65 in effect on the date referenced in ORCAA Rule 1.11 are adopted by reference.

[Adopted 10/29/16]



## APPENDIX A - ADOPTED FEDERAL REGULATIONS AND STANDARDS

### 40 CFR Part 60 - Standards of Performance for New Stationary Sources

|            |                                                                                                                                                               |
|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Subpart A  | General Provisions                                                                                                                                            |
| Subpart D  | Fossil-Fuel-Fired Steam Generators for which Construction is Commenced after August 17, 1971                                                                  |
| Subpart Da | Electric Utility Steam Generating Units for which Construction is Commenced after September 18, 1978                                                          |
| Subpart Db | Industrial-Commercial-Institutional Steam Generating Units                                                                                                    |
| Subpart Dc | Small Industrial-Commercial-Institutional Steam Generating Units                                                                                              |
| Subpart E  | Incinerators                                                                                                                                                  |
| Subpart Ea | Municipal Waste Combustors for which Construction is Commenced after December 20, 1989 and on or before September 20, 1994                                    |
| Subpart Eb | Large Municipal Waste Combustors                                                                                                                              |
| Subpart Ec | Hospital/Medical/Infectious Waste Incinerators                                                                                                                |
| Subpart F  | Portland Cement Plants                                                                                                                                        |
| Subpart G  | Nitric Acid Plants                                                                                                                                            |
| Subpart Ga | Nitric Acid Plants for which Construction, Reconstruction, or Modification Commenced after October 14, 2011                                                   |
| Subpart H  | Sulfuric Acid Plants                                                                                                                                          |
| Subpart I  | Hot Mix Asphalt Facilities                                                                                                                                    |
| Subpart J  | Petroleum Refineries                                                                                                                                          |
| Subpart Ja | Petroleum Refineries for which Construction, Reconstruction, or Modification Commenced After May 14, 2007                                                     |
| Subpart K  | Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced after June 11, 1973 and prior to May 19, 1978         |
| Subpart Ka | Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced after May 18, 1978 and prior to July 23, 1984         |
| Subpart Kb | VOC Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984 |
| Subpart L  | Secondary Lead Smelters                                                                                                                                       |
| Subpart M  | Secondary Brass and Bronze Production Plants                                                                                                                  |
| Subpart N  | Primary Emissions from Basic Oxygen Process Furnaces for which Construction is Commenced after June 11, 1973                                                  |
| Subpart Na | Secondary Emissions from Basic Oxygen Process Steel-making Facilities for which Construction is Commenced after January 20, 1983                              |
| Subpart O  | Sewage Treatment Plants                                                                                                                                       |
| Subpart P  | Primary Copper Smelters                                                                                                                                       |
| Subpart Q  | Primary Zinc Smelters                                                                                                                                         |
| Subpart R  | Primary Lead Smelters                                                                                                                                         |
| Subpart T  | Phosphate Fertilizer Industry: Wet Process Phosphoric Acid Plants                                                                                             |

|              |                                                                                                                                                                           |
|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Subpart U    | Phosphate Fertilizer Industry: Superphosphoric Acid Plants                                                                                                                |
| Subpart V    | Phosphate Fertilizer Industry: Diammonium Phosphate Plants                                                                                                                |
| Subpart W    | Phosphate Fertilizer Industry: Triple Superphosphate Plants                                                                                                               |
| Subpart X    | Phosphate Fertilizer Industry: Granular Triple Superphosphate Storage Facilities                                                                                          |
| Subpart Y    | Coal Preparation Plants                                                                                                                                                   |
| Subpart Z    | Ferroalloy Production Facilities                                                                                                                                          |
| Subpart AA   | Steel Plants: Electric Arc Furnaces Constructed after October 21, 1974 and on or before August 17, 1983                                                                   |
| Subpart AAa  | Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels Constructed after August 7, 1983                                                             |
| Subpart CC   | Glass Manufacturing Plants                                                                                                                                                |
| Subpart DD   | Grain Elevators                                                                                                                                                           |
| Subpart EE   | Surface Coating of Metal Furniture                                                                                                                                        |
| Subpart GG   | Stationary Gas Turbines                                                                                                                                                   |
| Subpart HH   | Lime Manufacturing Plants                                                                                                                                                 |
| Subpart KK   | Lead-Acid Battery Manufacturing Plants                                                                                                                                    |
| Subpart LL   | Metallic Mineral Processing Plants                                                                                                                                        |
| Subpart MM   | Automobile and Light Duty Truck Surface Coating Operations                                                                                                                |
| Subpart NN   | Phosphate Rock Plants                                                                                                                                                     |
| Subpart PP   | Ammonium Sulfate Manufacture                                                                                                                                              |
| Subpart QQ   | Graphic Arts Industry: Publication Rotogravure Printing                                                                                                                   |
| Subpart RR   | Pressure Sensitive Tape and Label Surface Coating Standards                                                                                                               |
| Subpart SS   | Industrial Surface Coating: Large Appliances                                                                                                                              |
| Subpart TT   | Metal Coil Surface Coating                                                                                                                                                |
| Subpart UU   | Asphalt Processing and Asphalt Roof Manufacture                                                                                                                           |
| Subpart VV   | Equipment Leaks of VOC in Synthetic Organic Chemical Manufacturing Industry                                                                                               |
| Subpart VVa  | Equipment Leaks of VOC in Synthetic Organic Chemical Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After November 7, 2006      |
| Subpart WW   | Beverage Can Surface Coating Industry                                                                                                                                     |
| Subpart XX   | Bulk Gasoline Terminals                                                                                                                                                   |
| Subpart AAA  | New Residential Wood Heaters – Title V sources only                                                                                                                       |
| Subpart BBB  | Rubber Tire Manufacturing Industry                                                                                                                                        |
| Subpart DDD  | VOC Emissions from Polymer Manufacturing Industry                                                                                                                         |
| Subpart FFF  | Flexible Vinyl and Urethane Coating and Printing                                                                                                                          |
| Subpart GGG  | Equipment Leaks of VOC in Petroleum Refineries                                                                                                                            |
| Subpart GGGa | Equipment Leaks of VOC in Petroleum Refineries for which Construction, Reconstruction, or Modification Commenced After January 4, 1983, And On Or Before November 7, 2006 |

|              |                                                                                                                                                                                                                  |
|--------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Subpart HHH  | Synthetic Fiber Production Facilities                                                                                                                                                                            |
| Subpart III  | VOC Emissions from Synthetic Organic Chemical Manufacturing Industry Air Oxidation Unit Processes                                                                                                                |
| Subpart JJJ  | Petroleum Dry Cleaners                                                                                                                                                                                           |
| Subpart KKK  | Equipment Leaks of VOC from Onshore Natural Gas Processing Plants                                                                                                                                                |
| Subpart LLL  | Onshore Natural Gas Processing: SO <sub>2</sub> Emissions                                                                                                                                                        |
| Subpart NNN  | VOC Emissions from Synthetic Organic Chemical Manufacturing Industry Distillation Operations                                                                                                                     |
| Subpart OOO  | Nonmetallic Mineral Processing Plants                                                                                                                                                                            |
| Subpart PPP  | Wool Fiberglass Insulation Manufacturing Plants                                                                                                                                                                  |
| Subpart QQQ  | VOC Emissions from Petroleum Refinery Wastewater Systems                                                                                                                                                         |
| Subpart RRR  | VOCs from Synthetic Organic Chemical Manufacturing Industry Reactor Processes                                                                                                                                    |
| Subpart SSS  | Magnetic Tape Coating Facilities                                                                                                                                                                                 |
| Subpart TTT  | Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines                                                                                                                               |
| Subpart UUU  | Calciners and Dryers in Mineral Industries                                                                                                                                                                       |
| Subpart VVV  | Polymeric Coating of Supporting Substrates Facilities                                                                                                                                                            |
| Subpart WWW  | Municipal Solid Waste Landfills                                                                                                                                                                                  |
| Subpart AAAA | Small Municipal Waste Combustion Units for which Construction is Commenced after August 30, 1999 or for which Modification or Reconstruction is Commenced after June 6, 2001                                     |
| Subpart CCCC | Commercial and Industrial Solid Waste Incineration Units for which Construction is Commenced after November 30, 1999 or for which Modification or Reconstruction is Commenced on or after June 1, 2001           |
| Subpart EEEE | Standards of Performance for Other Solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004, or for Which Modification or Reconstruction is Commenced on or After June 16, 2006 |
| Subpart IIII | Standards of Performance for Stationary Compression Ignition Internal Combustion Engines – Title V sources only.                                                                                                 |
| Subpart JJJJ | Standards of Performance for Stationary Spark Ignition Internal Combustion Engines – Title V sources only.                                                                                                       |
| Subpart KKKK | Standards of Performance for Stationary Combustion Turbines                                                                                                                                                      |
| Subpart LLLL | Standards of Performance for New Sewage Sludge Incineration Units                                                                                                                                                |
| Subpart OOOO | Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution                                                                                                                 |
| Subpart QQQQ | Standards of Performance for New Residential Hydronic Heaters and Forced-Air Furnaces – Title V sources only.                                                                                                    |
| Subpart TTTT | Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units                                                                                                                              |



|                |            |
|----------------|------------|
| 40 CFR Part 60 | Appendix A |
| 40 CFR Part 60 | Appendix B |
| 40 CFR Part 60 | Appendix C |
| 40 CFR Part 60 | Appendix D |
| 40 CFR Part 60 | Appendix F |
| 40 CFR Part 60 | Appendix I |

#### 40 CFR Part 61 – National Emission Standards for Hazardous Air Pollutants

|                |                                                                                              |
|----------------|----------------------------------------------------------------------------------------------|
| Subpart A      | General Provisions                                                                           |
| Subpart C      | Beryllium                                                                                    |
| Subpart D      | Beryllium Rocket Motor Firing                                                                |
| Subpart E      | Mercury                                                                                      |
| Subpart F      | Vinyl Chloride                                                                               |
| Subpart J      | Equipment Leaks of Benzene                                                                   |
| Subpart L      | Benzene from Coke By-Product Recovery Plants                                                 |
| Subpart M      | Asbestos                                                                                     |
| Subpart N      | Inorganic Arsenic from Glass Manufacturing Plants                                            |
| Subpart O      | Inorganic Arsenic from Primary Copper Smelters                                               |
| Subpart P      | Inorganic Arsenic emissions from Arsenic Trioxide and Metallic Arsenic Production Facilities |
| Subpart V      | Equipment Leaks (Fugitive Sources)                                                           |
| Subpart Y      | Benzene from Benzene Storage Vessels                                                         |
| Subpart BB     | Benzene from Benzene Transfer Operations                                                     |
| Subpart FF     | Benzene Waste Operations                                                                     |
| 40 CFR Part 61 | Appendix A                                                                                   |
| 40 CFR Part 61 | Appendix B                                                                                   |
| 40 CFR Part 61 | Appendix C                                                                                   |
| 40 CFR Part 61 | Appendix D                                                                                   |
| 40 CFR Part 61 | Appendix E                                                                                   |

#### 40 CFR Part 63 – National Emission Standards for Hazardous Air Pollutants for Source Categories

|           |                                                                                                                                                                                                 |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Subpart A | General Provisions                                                                                                                                                                              |
| Subpart B | Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections, Sections 112(g) and 112(j)                                                      |
| Subpart C | List of Hazardous Air Pollutants, Petition Process, Lesser Quantity Designations, Source Category List                                                                                          |
| Subpart D | Regulations Governing Compliance Extensions for Early Reductions of Hazardous Air Pollutants                                                                                                    |
| Subpart F | National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry                                                                     |
| Subpart G | National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry Process Vents, Storage Vessels, Transfer Operations, and Wastewater |

|            |                                                                                                                                                 |
|------------|-------------------------------------------------------------------------------------------------------------------------------------------------|
| Subpart H  | National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks                                                            |
| Subpart I  | National Emission Standards for Organic Hazardous Air Pollutants for Certain Processes Subject to the Negotiated Regulation for Equipment Leaks |
| Subpart J  | National Emission Standards for Hazardous Air Pollutants for Polyvinyl Chloride and Copolymers Production                                       |
| Subpart L  | National Emission Standards for Coke Oven Batteries                                                                                             |
| Subpart M  | National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities – Title V sources only.                                           |
| Subpart N  | National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks                |
| Subpart O  | Ethylene Oxide Emissions Standards for Sterilization Facilities                                                                                 |
| Subpart Q  | National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers                                                  |
| Subpart R  | National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)                       |
| Subpart S  | National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry                                                       |
| Subpart T  | National Emission Standards for Halogenated Solvent Cleaning                                                                                    |
| Subpart U  | National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins                                                  |
| Subpart W  | National Emission Standards for Hazardous Air Pollutants for Epoxy Resins Production and Non-Nylon Polyamides Production                        |
| Subpart X  | National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting                                                           |
| Subpart Y  | National Emission Standards for Marine Tank Vessel Loading Operations                                                                           |
| Subpart AA | National Emission Standards for Hazardous Air Pollutants from Phosphoric Acid Manufacturing Plants                                              |
| Subpart BB | National Emission Standards for Hazardous Air Pollutants from Phosphate Fertilizers Production Plants                                           |
| Subpart CC | National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries                                                              |
| Subpart DD | National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations                                            |
| Subpart EE | National Emission Standards for Magnetic Tape Manufacturing Operations                                                                          |
| Subpart GG | National Emission Standards for Aerospace Manufacturing and Rework Facilities                                                                   |
| Subpart HH | National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities                                         |
| Subpart II | National Emission Standards for Shipbuilding and Ship                                                                                           |

|             |                                                                                                                                                                   |
|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|             | Repair (Surface Coating)                                                                                                                                          |
| Subpart JJ  | National Emission Standards for Wood Furniture Manufacturing Operations                                                                                           |
| Subpart KK  | National Emission Standard for the Printing and Publishing Industry                                                                                               |
| Subpart MM  | National Emission Standard for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills |
| Subpart OO  | National Emission Standards for Tanks -Level 1                                                                                                                    |
| Subpart PP  | National Emission Standards for Containers                                                                                                                        |
| Subpart QQ  | National Emission Standards for Surface Impoundments                                                                                                              |
| Subpart RR  | National Emission Standards for Individual Drain Systems                                                                                                          |
| Subpart SS  | National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process                              |
| Subpart TT  | National Emission Standards for Equipment Leaks - Control Level 1                                                                                                 |
| Subpart UU  | National Emission Standards for Equipment Leaks - Control Level 2 Standards                                                                                       |
| Subpart VV  | National Emission Standards for Oil-Water Separators and Organic-Water Separators                                                                                 |
| Subpart WW  | National Emission Standards for Storage Vessels (Tanks) -Control Level 2                                                                                          |
| Subpart XX  | National Emission Standards for Ethylene Manufacturing Process Units: Heat Exchange Systems and Waste Operations                                                  |
| Subpart YY  | National Emission Standards for Hazardous Air Pollutants for Source Categories: Generic Maximum Achievable Control Technology Standards                           |
| Subpart CCC | National Emission Standards for Hazardous Air Pollutants for Steel Pickling--HCl Process Facilities and Hydrochloric Acid Regeneration Plants                     |
| Subpart DDD | National Emission Standards for Hazardous Air Pollutants for Mineral Wool Production                                                                              |
| Subpart EEE | National Emission Standard for Hazardous Air Pollutants from Hazardous Waste Combustors                                                                           |
| Subpart GGG | National Emission Standards Pharmaceuticals Production                                                                                                            |
| Subpart HHH | National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities                                                     |
| Subpart III | National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production                                                                |
| Subpart JJJ | National Emission Standard for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins                                                                    |
| Subpart LLL | National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry                                                          |
| Subpart MMM | National Emission Standards for Hazardous Air Pollutants for Pesticide Active Ingredient Production                                                               |
| Subpart NNN | National Emission Standards for Hazardous Air Pollutants                                                                                                          |

|              |                                                                                                                                                                    |
|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|              | for Wool Fiberglass Manufacturing                                                                                                                                  |
| Subpart OOO  | National Emission Standards for Hazardous Air Pollutants Emissions: Manufacture of Amino/Phenolic Resins                                                           |
| Subpart PPP  | National Emission Standards for Hazardous Air Pollutants Emissions for Polyether Polyols Production                                                                |
| Subpart QQQ  | National Emission Standards for Hazardous Air Pollutants for Primary Copper Smelting                                                                               |
| Subpart RRR  | National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production – Title V sources only.                                                 |
| Subpart TTT  | National Emission Standards for Hazardous Air Pollutants for Primary Lead Smelting                                                                                 |
| Subpart UUU  | National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units. |
| Subpart VVV  | National Emission Standard for Hazardous Air Pollutants: Publicly Owned Treatment Works                                                                            |
| Subpart XXX  | National Emission Standards for Hazardous Air Pollutants for Ferroalloys Production: Ferromanganese and Silicomanganese                                            |
| Subpart AAAA | National Emission Standard for Hazardous Air Pollutants: Municipal Solid Waste Landfills                                                                           |
| Subpart CCCC | National Emission Standard for Hazardous Air Pollutants: Manufacturing of Nutritional Yeast                                                                        |
| Subpart DDDD | National Emission Standard for Hazardous Air Pollutants: Plywood and Composite Wood Products                                                                       |
| Subpart EEEE | National Emission Standard for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)                                                               |
| Subpart FFFF | National Emission Standard for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing                                                              |
| Subpart GGGG | National Emission Standard for Hazardous Air Pollutants: Solvent Extractions for Vegetable Oil Production                                                          |
| Subpart HHHH | National Emission Standard for Hazardous Air Pollutants for Wet-Formed Fiberglass Mat Production                                                                   |
| Subpart IIII | National Emission Standard for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks                                                      |
| Subpart JJJJ | National Emission Standard for Hazardous Air Pollutants: Paper and Other Web Coating                                                                               |
| Subpart KKKK | National Emission Standard for Hazardous Air Pollutants: Surface Coating of Metal Cans                                                                             |
| Subpart MMMM | National Emission Standard for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products                                              |
| Subpart NNNN | National Emission Standard for Hazardous Air Pollutants: Surface Coating of Large Appliances                                                                       |
| Subpart OOOO | National Emission Standard for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles                                               |

|               |                                                                                                                                          |
|---------------|------------------------------------------------------------------------------------------------------------------------------------------|
| Subpart PPPP  | National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products                               |
| Subpart QQQQ  | National Emission Standard for Hazardous Air Pollutants: Surface Coating of Wood Building Products                                       |
| Subpart RRRR  | National Emission Standard for Hazardous Air Pollutants: Surface Coating of Metal Furniture                                              |
| Subpart SSSS  | National Emission Standard for Hazardous Air Pollutants: Surface Coating of Metal Coil                                                   |
| Subpart TTTT  | National Emission Standard for Hazardous Air Pollutants for Leather Finishing Operations                                                 |
| Subpart UUUU  | National Emission Standard for Hazardous Air Pollutants for Cellulose Products Manufacturing                                             |
| Subpart VVVV  | National Emission Standard for Hazardous Air Pollutants for Boat Manufacturing                                                           |
| Subpart WWWW  | National Emission Standard for Hazardous Air Pollutants: Reinforced Plastic Composites Production                                        |
| Subpart XXXX  | National Emission Standard for Hazardous Air Pollutants: Rubber Tire Manufacturing                                                       |
| Subpart YYYY  | National Emission Standard for Hazardous Air Pollutants for Stationary Combustion Turbines                                               |
| Subpart ZZZZ  | National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines – Title V sources only. |
| Subpart AAAAA | National Emission Standard for Hazardous Air Pollutants for Lime Manufacturing Plants                                                    |
| Subpart BBBB  | National Emission Standard for Hazardous Air Pollutants for Semiconductor Manufacturing                                                  |
| Subpart CCCCC | National Emission Standard for Hazardous Air Pollutants for Coke Ovens: Pushing, Quenching, and Battery Stacks                           |
| Subpart DDDDD | National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters       |
| Subpart EEEEE | National Emission Standard for Hazardous Air Pollutants for Iron and Steel Foundries                                                     |
| Subpart FFFFF | National Emission Standard for Hazardous Air Pollutants for Integrated Iron and Steel Manufacturing Facilities                           |
| Subpart GGGGG | National Emission Standard for Hazardous Air Pollutants: Site Remediation                                                                |
| Subpart HHHHH | National Emission Standard for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing                                             |
| Subpart IIIII | National Emission Standard for Hazardous Air Pollutants: Mercury Emissions from Mercury Cell Chlor-Alkali Plants                         |
| Subpart JJJJJ | National Emission Standard for Hazardous Air Pollutants for Brick and Structural Clay Products Manufacturing                             |
| Subpart KKKKK | National Emission Standard for Hazardous Air Pollutants for Clay Ceramics Manufacturing                                                  |
| Subpart LLLLL | National Emission Standard for Hazardous Air Pollutants: Asphalt Processing and Asphalt Roofing Manufacturing                            |

|               |                                                                                                                                                                                  |
|---------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Subpart MMMMM | National Emission Standard for Hazardous Air Pollutants: Flexible Polyurethane Foam Fabrication Operations                                                                       |
| Subpart NNNNN | National Emission Standard for Hazardous Air Pollutants: Hydrochloric Acid Production                                                                                            |
| Subpart PPPPP | National Emission Standard for Hazardous Air Pollutants for Engine Test Cells/Standards                                                                                          |
| Subpart QQQQQ | National Emission Standard for Hazardous Air Pollutants for Friction Materials Manufacturing Facilities                                                                          |
| Subpart RRRRR | National Emission Standard for Hazardous Air Pollutants: Taconite Iron Ore Processing                                                                                            |
| Subpart SSSSS | National Emission Standard for Hazardous Air Pollutants for Refractory Products Manufacturing                                                                                    |
| Subpart TTTTT | National Emission Standard for Hazardous Air Pollutants for Primary Magnesium Refining                                                                                           |
| Subpart UUUUU | National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units                                                            |
| Subpart WWWW  | National Emission Standards for Hospital Ethylene Oxide Sterilizers                                                                                                              |
| Subpart YYYYY | National Emission Standard for Hazardous Air Pollutants for Area/Sources: Electric Arc Furnace Steelmaking Facilities                                                            |
| Subpart ZZZZZ | National Emission Standard for Hazardous Air Pollutants for Iron and Steel Foundries Area Sources                                                                                |
| Subpart BBBBB | National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities – Title V sources only. |
| Subpart CCCCC | National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities                                                                     |
| Subpart DDDDD | National Emission Standards for Hazardous Air Pollutants for Polyvinyl Chloride and Copolymers Production Area Sources                                                           |
| Subpart EEEEE | National Emission Standards for Hazardous Air Pollutants for Primary Copper Smelting Area Sources                                                                                |
| Subpart FFFFF | National Emission Standards for Hazardous Air Pollutants for Secondary Copper Smelting Area Sources                                                                              |
| Subpart GGGGG | National Emission Standards for Hazardous Air Pollutants for Primary Nonferrous Metals Area Sources—Zinc, Cadmium, and Beryllium                                                 |
| Subpart HHHHH | National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources – Title V sources only.                   |
| Subpart JJJJJ | National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources                                                      |
| Subpart LLLLL | National Emission Standards for Hazardous Air Pollutants for Acrylic and Modacrylic Fibers Production Area Sources                                                               |
| Subpart MMMMM | National Emission Standards for Hazardous Air Pollutants for Carbon Black Production Area Sources                                                                                |

|                 |                                                                                                                                                                   |
|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Subpart NNNNNN  | National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources: Chromium Compounds                                              |
| Subpart OOOOOO  | National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources                                   |
| Subpart PPPPPP  | National Emission Standards for Hazardous Air Pollutants for Lead Acid Battery Manufacturing Area Sources                                                         |
| Subpart QQQQQQ  | National Emission Standards for Hazardous Air Pollutants for Wood Preserving Area Sources                                                                         |
| Subpart RRRRRR  | National Emission Standards for Hazardous Air Pollutants for Clay Ceramics Manufacturing Area Sources                                                             |
| Subpart SSSSSS  | National Emission Standards for Hazardous Air Pollutants for Glass Manufacturing Area Sources                                                                     |
| Subpart TTTTTT  | National Emission Standards for Hazardous Air Pollutants for Secondary Nonferrous Metals Processing Area Sources                                                  |
| Subpart VVVVVV  | National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources                                                                  |
| Subpart WWWWWW  | National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations                                              |
| Subpart XXXXXX  | National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories – Title V sources only. |
| Subpart YYYYYY  | National Emission Standards for Hazardous Air Pollutants for Area Sources: Ferroalloys Production Facilities                                                      |
| Subpart ZZZZZZ  | National Emission Standards for Hazardous Air Pollutants Area Source Standards for Aluminum, Copper, and Other Nonferrous Foundries                               |
| Subpart AAAAAA  | National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing                                   |
| Subpart BBBBBB  | National Emission Standards for Hazardous Air Pollutants for Area Sources: Chemical Preparations Industry                                                         |
| Subpart CCCCCC  | National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing                                               |
| Subpart DDDDDD  | National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Prepared Feeds Manufacturing                                                  |
| Subpart EEEEEEE | National Emission Standards for Hazardous Air Pollutants: Gold Mine Ore Processing and Production Area Source Category                                            |
| Subpart HHHHHH  | National Emission Standards for Hazardous Air Pollutant Emissions for Polyvinyl Chloride and Copolymers Production                                                |
| 40 CFR Part 63  | Appendix A                                                                                                                                                        |
| 40 CFR Part 63  | Appendix B                                                                                                                                                        |

|                                |                                                                                      |
|--------------------------------|--------------------------------------------------------------------------------------|
| 40 CFR Part 63                 | Appendix C                                                                           |
| 40 CFR Part 63                 | Appendix D                                                                           |
| 40 CFR Part 63                 | Appendix E                                                                           |
| Section 2.18 of 40 CFR Part 65 | Consolidated Requirements for the Synthetic Organic Chemical Manufacturing Industry. |

[Adopted 10/29/16; Amended 01/04/20]



Prepared for  
**Enviva Pellets Lucedale, LLC**  
Lucedale, George County, Mississippi

Prepared By  
**Ramboll US Corporation**  
Baton Rouge, Louisiana

Project Number  
**1690008244**

Date  
**September 2018**

ORIGINAL

SEP 10 2018

MDEO

0840 - 00099

FILE

# APPLICATION FOR INITIAL STATE PERMIT TO CONSTRUCT ENVIVA PELLETS LUCEDALE, LLC



## CONTENTS

|           |                                                                           |           |
|-----------|---------------------------------------------------------------------------|-----------|
| <b>1.</b> | <b>INTRODUCTION</b>                                                       | <b>1</b>  |
| <b>2.</b> | <b>PROCESS DESCRIPTION</b>                                                | <b>2</b>  |
| <b>3.</b> | <b>POTENTIAL EMISSIONS QUANTIFICATION</b>                                 | <b>6</b>  |
| 3.1       | Debarker (AA-001)                                                         | 6         |
| 3.2       | Log Chipping (AA-002)                                                     | 6         |
| 3.3       | Bark Hog (AA-003)                                                         | 6         |
| 3.4       | Green Wood Handling Operations (AA-004) and Bark Handling Operations (IA) | 6         |
| 3.5       | Green Screen (AA-005)                                                     | 7         |
| 3.6       | Green Wood Storage Pile (AA-006) and Bark Storage Pile (IA)               | 7         |
| 3.7       | Dryers, Green Wood Hammermills, and Dryer System Double Duct Burners (IA) | 7         |
| 3.8       | Pelletizing Lines (AA-016 and AA-017)                                     | 10        |
| 3.9       | Pellet Loadout Bins and Finished Product Handling (AA-018)                | 10        |
| 3.10      | Additive Handling and Storage (AA-019)                                    | 10        |
| 3.11      | Dry Shavings Silo (AA-020) and Dry Shavings Handling (AA-021)             | 11        |
| 3.12      | Emergency Generator (AA-022) and Fire Water Pump Engine (AA-023)          | 11        |
| 3.13      | Diesel Storage Tanks (IA)                                                 | 11        |
| 3.14      | Paved Roads (AA-024)                                                      | 11        |
| 3.15      | Propane Vaporizer (IA)                                                    | 12        |
| <b>4.</b> | <b>STATE AND FEDERAL PERMITTING APPLICABILITY</b>                         | <b>13</b> |
| 4.1       | Federal Permitting Programs                                               | 13        |
| 4.2       | Mississippi Permitting Program                                            | 14        |
| <b>5.</b> | <b>REGULATORY APPLICABILITY</b>                                           | <b>15</b> |
| 5.1       | New Source Performance Standards                                          | 15        |
| 5.2       | National Emission Standards for Hazardous Air Pollutants                  | 16        |
| 5.3       | Compliance Assurance Monitoring                                           | 22        |
| 1.1       | Chemical Accident Prevention Provisions                                   | 23        |
| 5.4       | Mississippi Administrative Code                                           | 23        |

## APPENDIX

- Appendix A – Area Map and Site Plan
- Appendix B – Process Flow Diagram
- Appendix C – Potential Emissions Calculations
- Appendix D – Permit Application Forms

## ACRONYMS AND ABBREVIATIONS

|                  |                                                          |
|------------------|----------------------------------------------------------|
| AER              | Air Emissions Reporting                                  |
| AP-42            | Compilation of Air Pollutant Emission Factors            |
| bhp              | brake horsepower                                         |
| BMP              | Best Management Practice                                 |
| CAA              | Clean Air Act                                            |
| CAM              | Compliance Assurance Monitoring                          |
| CFR              | Code of Federal Regulations                              |
| CI               | Compression Ignition                                     |
| CO               | Carbon Monoxide                                          |
| CO <sub>2</sub>  | Carbon Dioxide                                           |
| EPA              | Environmental Protection Agency                          |
| EPD              | Environmental Permits Division                           |
| FSC              | Forest Stewardship Council                               |
| HAP              | Hazardous Air Pollutant                                  |
| hp               | Horsepower                                               |
| H <sub>2</sub> O | Water                                                    |
| ICE              | Internal Combustion Engine                               |
| lb               | Pound                                                    |
| MACT             | Maximum Achievable Control Technology                    |
| MDEQ             | Mississippi Department of Environmental Quality          |
| MMBtu            | Million British thermal units                            |
| NAAQS            | National Ambient Air Quality Standards                   |
| NCASI            | National Council for Air and Stream Improvement          |
| NESHAP           | National Emission Standards for Hazardous Air Pollutants |
| NNSR             | Nonattainment New Source Review                          |
| NO <sub>x</sub>  | Nitrogen Oxides (NO + NO <sub>2</sub> )                  |
| NSPS             | New Source Performance Standards                         |
| NSR              | New Source Review                                        |
| NWS              | National Weather Service                                 |
| ODT              | Oven Dried Tons                                          |
| PCWP             | Plywood and Composite Wood Products                      |



|                   |                                                                      |
|-------------------|----------------------------------------------------------------------|
| PEFC              | Programme for the Endorsement of Forest Certifications               |
| PM                | Particulate Matter                                                   |
| PM <sub>2.5</sub> | Particulate Matter Less Than 2.5 Micrometers in Aerodynamic Diameter |
| PM <sub>10</sub>  | Particulate Matter Less Than 10 Micrometers in Aerodynamic Diameter  |
| PSD               | Prevention of Significant Deterioration                              |
| PSEU              | Pollutant Specific Emission Unit                                     |
| RICE              | Reciprocating Internal Combustion Engine                             |
| RCO               | Regenerative Catalytic Oxidizer                                      |
| RMP               | Risk Management Plan                                                 |
| RTO               | Regenerative Thermal Oxidizer                                        |
| SCAQMD            | South Coast Air Quality Management District                          |
| SIP               | State Implementation Plan                                            |
| SO <sub>2</sub>   | Sulfur Dioxide                                                       |
| SFI               | Sustainable Forestry Initiative                                      |
| TCO               | Thermal Catalytic Oxidizer                                           |
| TO                | Thermal Oxidizer                                                     |
| tph               | tons per hour                                                        |
| tpy               | tons per year                                                        |
| VOC               | Volatile Organic Compounds                                           |
| WESP              | Wet Electrostatic Precipitator                                       |

## 1. INTRODUCTION

Enviva Pellets Lucedale, LLC (Enviva) is proposing to construct a greenfield wood pellet manufacturing plant (referred to herein as “the Lucedale plant” or “the plant”) in Lucedale, George County, Mississippi. It should be noted that on May 20, 2014, Green Circle Energy, Inc (Green Circle) received Construction Permit No. 0840-00022 authorizing construction of a proposed greenfield wood pellet manufacturing plant at the Lucedale site. This construction permit was transferred to Enviva on November 20, 2015; however, construction on the new plant was never initiated by Enviva or Green Circle. On June 16, 2017, Enviva submitted a request to Mississippi Department of Environmental Quality (MDEQ) to revoke Construction Permit No. 0840-00022. Since that time, business conditions have changed and Enviva is now re-starting the permitting process for a new construction permit for the Lucedale plant. The proposed new Lucedale plant will be designed to produce approximately 1,420,500 oven dried tons (ODT) per year of wood pellets utilizing up to 85% softwood. Construction will be completed in two phases with the initial construction phase allowing production of approximately 781,300 ODT per year. The second construction phase will be implemented within 18 months of completing the first construction phase and will allow the facility to achieve the final production capacity of approximately 1,420,500 ODT per year. The plant will include a Log Chipper, Bark Hog, Debarker, Green Screen, Green Hammermills, Rotary Dryers, Dry Hammermills, Pellet Presses and Coolers, product loadout operations and other ancillary activities.

The Lucedale plant will be a major source with respect to the Title V Operating Permit Program because facility-wide potential emissions of one or more criteria pollutants will exceed the major source threshold of 100 tons per year (tpy). Furthermore, the plant will be a major source of hazardous air pollutants (HAP) due to potential total HAP emissions and maximum individual HAP emissions above the major source thresholds of 25 tpy, and 10 tpy, respectively. However, the Lucedale plant will be a minor source with respect to the New Source Review (NSR) permitting programs because facility-wide potential emissions of all regulated pollutants will be below the major source threshold of 250 tpy.

Enviva is submitting this application for a State Permit to Construct to the Mississippi Department of Environmental Quality (MDEQ) Environmental Permits Division (EPD) in accordance with Title 11 of the Mississippi Administrative Code (Miss. Admin. Code) Part (Pt.) 2 Chapter (Ch.) 2 Rule (R.) 2.1.D. A description of the process is provided in Section 2 and methodologies used to quantify potential emissions are summarized in Section 3. Section 4 describes the applicability of federal and state permitting programs. Section 5 includes a detailed applicability analysis of both federal and state regulations.



## 2. PROCESS DESCRIPTION

Enviva manufactures wood pellets for use as a renewable fuel for energy generation and industrial customers. Enviva's customers use wood pellets in place of coal, significantly reducing emissions of pollutants such as lifecycle carbon dioxide (CO<sub>2</sub>)/greenhouse gases (GHG), mercury (Hg), arsenic (As), and lead (Pb). The company is dedicated to improving the environmental profile of energy generation while promoting sustainable forestry in the southeastern United States. Enviva holds certifications from the Forest Stewardship Council (FSC), Sustainable Forestry Initiative (SFI), Programme for the Endorsement of Forest Certification (PEFC), and Sustainable Biomass Program (SBP). Enviva requires that all suppliers adhere to state-developed "Best Management Practices" (BMPs) in their activities to protect water quality and sensitive ecosystems. In addition, Enviva is implementing an industry leading "track and trace" system to further ensure that all fiber resources come from responsible harvests. Enviva pays particular attention to: land use change, use and effectiveness of BMPs, wetlands, biodiversity, and certification status. All of this combined ensures that Enviva's forestry activities contribute to healthy forests both today and in the future.<sup>1</sup> The following process description details the proposed operations at the Lucedale plant.

Wood fiber (round wood, green wood chips, bark, and dry shavings) will be delivered to the Lucedale plant via trucks where it will then be unloaded and stored. The plant will include three (3) chip truck dumps (ID# AA-004, Greenwood Handling Operations), one (1) bark truck dump (ID# Insignificant Activity, Bark Handling Operations), and one (1) dry shavings truck dump (ID # AA-021, Dry Shavings Handling). Round wood will be stored as whole logs and will be debarked (ID# AA-001, Debarker) and chipped (ID# AA-002, Log Chipping), as needed. Bark from the Debarker and purchased bark will be transferred to the Bark Hog (ID# AA-003, Bark Hog) via conveyor for further processing, after which it will be transferred to the Bark Storage Pile (ID# Insignificant Activity, Bark Storage Pile) via conveyor.<sup>2</sup> The bark removed from the round wood, along with purchased bark, will be used as fuel for the dryer furnaces. Conveyors will transport wood chips and fuel to the dryers and furnaces, respectively.<sup>3</sup>

Dry shavings, largely composed of wood planer shavings and sawdust, will be delivered by truck to the plant's dry shavings truck dump. From the dry shavings truck dump, the dry shavings will be transferred to the Dry Shavings Silo (ID# AA-020, Dry Shavings Silo) via an enclosed conveyor and bucket elevator. As the dry shavings will already be dried, they will bypass the dryers. The Dry Shavings Silo will be equipped with a baghouse for control of particulate matter (PM) emissions resulting from air displaced during silo loading.

The Lucedale plant will include three (3) Dryer lines (ID#s AA-007, AA-010, and AA-013, Wood-fired Direct Heat Drying System Nos. 1, 2, and 3), each consisting of a bark-fired furnace and a rotary drum dryer. The maximum design heat input rate of each dryer will be

<sup>1</sup> A detailed description of Enviva's Responsible Wood Supply Program can be found at: <http://www.envivabiomass.com/sustainability/wood-sourcing/responsible-wood-supply-program/>

<sup>2</sup> Bark handling and storage is considered an insignificant activity per 11 Miss. Admin. Code Pt. 2 Ch. 6 R. 6.7.B(13).

<sup>3</sup> Bark will be transferred from the Bark Fuel Storage Pile via a walking floor to a covered conveyor and then to the fully enclosed Bark Fuel Bin. Due to complete enclosure of the Bark Feed Bin, no emissions are expected from transfer of material into the bin.



168 million British thermal units per hour (MMBtu/hr). The products of combustion from each furnace will directly exhaust to the rotary drum dryers, which will dry wood chips conveyed from the Green Wood Storage Pile (ID# AA-006, Green Wood Storage Pile). Prior to drying, the chips will be processed by a Green Screen (ID# AA-005, Green Screen) and three (3) Green Hammermills (ID#s AA-007 and AA-010, Green Hammermills) as needed to ensure proper size.

From the dryers, an induced draft will carry all dried chips and hot air to high efficiency material handling cyclones to remove the wood fiber. The dryer is designed to recirculate a portion of the exhaust gas to improve fuel and drying efficiency and reduce emissions. The non-recirculated portion of each dryer exhaust will flow through a wet electrostatic precipitator (WESP) and a regenerative thermal oxidizer (RTO) (ID# AA-007, AA-010, and AA-013, WESP/RTO Nos. 1, 2, and 3), then out a stack to the atmosphere. Each dryer line will have a dedicated WESP and RTO. The RTO burners will combust natural gas, with propane as a back-up fuel. The Green Hammermills will be part of a closed loop system that will exhaust to the WESP and RTO on Dryer Line 1. In the event Dryer Line 1 is not operational, the exhaust will be routed to the WESP and RTO on Dryer Line 2.

As the flue gas exits the dryer and begins to cool, wood tar can condense and coat the inner walls of the dryer ducts creating a fire risk. In order to prevent condensation from occurring and thus reduce the fire risk, the two (2) ducts (herein referred to as double ducts) on each dryer system will be heated. The duct from the cyclone outlet to the ID fan will be heated by one (1) low-NO<sub>x</sub> burner with a maximum heat input rating of 1 MMBtu/hr and a second 1 MMBtu/hr low-NO<sub>x</sub> burner will be used to heat the duct used for exhaust gas recirculation and the WESP. The burners will combust natural gas, or propane as back-up, and will exhaust to the WESPs and RTOs (ID# AA-007, AA-010, and AA-013, WESP/RTO Nos. 1, 2, and 3).<sup>4</sup>

Bypass stacks for each furnace (ID# AA-009, AA-012, AA-015, Furnace Bypass Stacks) and rotary drum dryer (ID# AA-008, AA-011, AA-014, Dryer Bypass Stacks) will be used to exhaust hot gases during start-ups (for temperature control), shutdowns, and malfunctions. Specifically, the Furnace Bypass Stacks will be used in the following situations:

- **Cold Start-ups:** The furnace bypass stacks will be used when the furnace is started up from a cold shutdown until the refractory is sufficiently heated and can sustain operations at a low level. The bypass stack will then be closed and the furnace will slowly be brought up to a normal operating rate.
- **Malfunction:** The furnace itself can abort and open the bypass stack in the event of a malfunction. This may be caused by failsafe interlocks associated with the furnace or dryer and emissions control systems as well as utility supply systems (i.e., electricity, compressed air, water/fire protection). As soon as the furnace aborts it will automatically switch to "idle mode" (defined as operation at up to a maximum heat input rate of 5 MMBtu/hr). The fuel feed is stopped and the heat input rate drops rapidly.

---

<sup>4</sup> Combustion units with a rated input capacity less than 10 MMBtu/hr that are fueled by liquefied petroleum gas or natural gas supplied by a public utility are considered insignificant per 11 Miss. Admin. Code Pt. 2, Ch. 6 R. 6.7.B(2)



- **Planned Shutdown:** In the event of a planned shutdown the furnace heat input will be decreased and all remaining fuel will be moved through the system to prevent a fire. The remaining fuel will be combusted prior to opening the furnace bypass stack.

Conditions under which the Dryer Bypass Stacks will be used are as follows:

- **Malfunction:** The dryer system can abort due to power failure, equipment failure, or as a result of a furnace abort. If the RTO goes offline as a result of interlock failure, the dryer will immediately abort. This can occur if the dryer temperature is out of range or as a result of equipment or power failure. Dryer abort will also be triggered if a spark is detected.
- **Planned Shutdown:** During planned shutdowns, as the remaining fuel is combusted by the furnace, the Operator will reduce the chip input to the dryer. When only a small amount of chips remain, these will be emptied to clean the dryer drum out. The dryer bypass stack will then be opened and a purge air fan used to ensure no explosive build-up occurs in the drum. Emissions during this time will be minimal as the furnace and dryer are no longer operating.

Use of the Furnace and Dryer Bypass Stacks for start-up, shutdown, and malfunctions will not exceed 100 hours per year for each dryer line at full operating capacity (i.e., 50 hours of furnace bypass at full capacity and 50 hours of dryer bypass at full capacity).

Each furnace may also operate up to 500 hours per year in "idle mode" with emissions routed to the Furnace Bypass Stacks. The purpose of operation in "idle mode" is to maintain the temperature of the fire brick lining the furnaces which may be damaged if it cools too rapidly. Operation in "idle mode" also significantly reduces the amount of time required to restart the dryers.

Emissions from Furnace and Dryer start-up, shutdown and malfunctions, and emissions from Furnace idle mode operations, are quantified and included in maximum allowable emissions presented in this permit application.

The Lucedale plant will include two (2) pelletizing lines, each consisting of twenty-four (24) Dry Hammermills, twelve (12) Pellet Mills, and six (6) Pellet Coolers. Dried wood chips will be stored in the Dry Hammermill Feed Silo and dry shavings in the Dry Shavings Silo (ID# AA-020) prior to being processed by the Dry Hammermills (ID# AA-016, AA-017, Forty-Eight Dry Hammermills). The Dry Hammermills will reduce the dry wood chips to under 4 mm (0.16") in size. From the Dry Hammermills, the processed wood fiber will be conveyed to a Pellet Mill Feed Silo which will be kept under negative pressure by aspiration systems. These aspiration systems will be routed to a wet scrubber and regenerative catalytic oxidizer (RCO) (ID# AA-016, Wet Scrubber-1/RCO-1). The Dry Hammermill Feed Silo, Pellet Mill Feed Silo, and all associated conveyors and transfer points will be sealed and kept under negative pressure.

Aspiration systems will be used to remove heated moist air from the Dry Hammermills, Pellet Mills, and Pellet Coolers. These aspiration systems will be routed to high efficiency material handling cyclones and then to wet scrubbers and RCOs for control of PM, HAP, and volatile organic compounds (VOC). Emissions from Pelletizing Lines 1 and 2 will be controlled by two (2) wet scrubbers and two (2) RCOs. Wet Scrubber-1/RCO-1 (ID# AA-016) will control emissions from thirty-two (32) Dry Hammermills, sixteen (16) Pellet Mills, and eight (8) Pellet Coolers. Wet Scrubber-2/RCO-2 (ID# AA-017) will control emissions from sixteen (16)



Dry Hammermills, eight (8) Pellet Mills, and four (4) Pellet Coolers. The RCO burners will combust natural gas, with propane as a back-up fuel.

Processed wood from the Pellet Mill Feed Silo will be conveyed to the Pellet Mills where wood fiber will be compressed by rotating press rollers and will exit through a sizing die. Heat from the friction of compressing the wood through the die activates wood lignin in the fiber which effectively bonds the material into a durable pellet. No resin or chemical binder will be used in the process. A dry powder additive may be used which acts as a lubricant for the dies. This additive would be added to sized wood from the Dry Hammermills prior to transfer to the Pellet Presses. The dry powder contains no hazardous chemicals or VOC materials. It will be delivered by truck and pneumatically loaded into an Additive Storage Silo (ID# AA-019, Additive Handling and Storage) which will be equipped with a baghouse to control PM emissions from air displaced during silo loading. The additive will then be conveyed via screw conveyor from the Additive Storage Silo to the milled fiber conveyor which will transfer milled wood to the Pellet Presses.

Pellets exiting the Pellet Mills will be gravity fed to counter air flow Pellet Coolers. From the Pellet Coolers, pellets will be conveyed to two (2) storage bins (ID# AA-018, Finished Product Handling and Pellet Loadout Bins) located above the railcar loading area. The bins will provide approximately one hour of pellet storage and uniformly meter out the pellets for railcar loading. All conveyors will be sealed with dust aspiration air directed to a baghouse. A slight negative pressure will be maintained in the loadout building as a fire prevention measure to prevent any build-up of dust on surfaces within the building. This slight negative pressure will be produced via an induced draft fan that will exhaust to the Finished Product Handling baghouse (ID# AA-018).

The Lucedale plant will also include one (1) 131 horsepower (hp) diesel-fired fire water pump (ID# AA-023, 131 hp Diesel-fired Fire Water Pump) and associated 185 gallon diesel fuel storage tank (ID# Insignificant Activity, 185 Gallon Diesel Storage Tank), one (1) 500 kilowatt (kW) diesel-fired emergency generator (ID# AA-022, 500 kW Diesel-Fired Emergency Generator) and associated 500 gallon diesel fuel storage tank (ID# Insignificant Activity, 500 Gallon Diesel Storage Tank), one (1) additional 5,000 gallon diesel fuel storage tank (ID# Insignificant Activity, 5,000 Gallon Diesel Storage Tank), as well as emissions from paved roads (ID# AA-024, Paved Roads).<sup>5</sup>

A direct-fired Propane Vaporizer (ID# Insignificant Activity, Propane Vaporizer) will be located on-site to vaporize propane gas for combustion by the RTO burners, RCO burners, and burners for the dryer system double ducts.<sup>6</sup> The vaporizer will have a maximum heat input capacity of 1 MMBtu/hr and will combust propane. Natural gas will be the primary fuel for all burners; however, propane may be used as a back-up fuel.

An area map and site plan are provided in Appendix A and a process flow diagram is provided in Appendix B.

<sup>5</sup> Storage tanks used exclusively to store diesel are considered an insignificant activity per 11 Miss. Admin. Code Pt. 2 Ch. 1 R. 6.7.B(7).

<sup>6</sup> Combustion units with a rated input capacity less than 10 MMBtu/hr that are fueled by liquefied petroleum gas or natural gas supplied by a public utility are considered insignificant per 11 Miss. Admin. Code Pt. 2, Ch. 6 R. 6.7.B(2).



### 3. POTENTIAL EMISSIONS QUANTIFICATION

The following summarizes the data sources and calculation methodologies used in quantifying potential emissions from the proposed Lucedale plant. Detailed potential emissions calculations are provided in Appendix C.

#### 3.1 Debarker (AA-001)

PM emissions will occur as a result of log debarking. Potential PM emissions from debarking were quantified based on an emission factor from EPA's *AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants* for Source Classification Code (SCC) 3-07-008-01 (Log Debarking).<sup>7</sup> All PM was assumed to be larger than 2.5 microns in diameter. The debarking drum will be enclosed, except for the two ends where logs enter and material exits after debarking. Detailed potential emission calculations are included in Appendix C, Table 4.

#### 3.2 Log Chipping (AA-002)

The chipping process will result in emissions of VOC and methanol. VOC and methanol emissions were quantified based on emission factors for log chipping from AP-42 Section 10.6.3, *Medium Density Fiberboard* and AP-42 Section 10.6.4, *Hardboard and Fiberboard*.<sup>8</sup> The Chipper will be located inside of a building. As such, there are no quantifiable particulate emissions. Detailed emission calculations are included in Appendix C, Table 5.

#### 3.3 Bark Hog (AA-003)

Processing of bark by the Bark Hog will result in emissions of PM, VOC, and methanol. Particulate emission factors were not available for this specific operation; therefore, potential PM emissions were quantified based on an emission factor from EPA's *AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants* for log debarking (SCC 3-07-008-01).<sup>9</sup> This emission factor is conservative given that the Bark Hog is primarily enclosed and thus will have minimal PM emissions. A belt will feed an infeed chute and the chute, hog, and outfeed will all be enclosed. VOC and methanol emissions were quantified based on emission factors for log chipping from AP-42 Section 10.6.3, *Medium Density Fiberboard*.<sup>10</sup> Detailed potential emission calculations are included in Appendix C, Table 6.

#### 3.4 Green Wood Handling Operations (AA-004) and Bark Handling Operations (IA)

Fugitive PM emissions will result from unloading purchased chips and bark from trucks into hoppers and transfer of these materials to storage piles via conveyors. Fugitive PM emissions from chip and bark transfer operations were calculated based on AP-42 Section 13.2.4, *Aggregate Handling and Storage Piles*.<sup>11</sup> Detailed potential emission calculations are included in Appendix C, Table 7.

<sup>7</sup> U.S. EPA. Office of Air Quality Planning and Standards. *AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants*. EPA 450/4-90-003. March 1990.

<sup>8</sup> U.S. EPA AP-42 Section 10.6.3, *Medium Density Fiberboard Manufacturing* (08/02).

<sup>9</sup> Ibid.

<sup>10</sup> Ibid.

<sup>11</sup> U.S. EPA AP-42 Section 13.2.4, *Aggregate Handling and Storage Piles* (11/06).



Green wood and bark contain a high moisture content approaching 50 percent water by weight. Therefore, Green Wood and Bark Handling will have minimal PM emissions. Per 11 Miss. Admin. Code Pt. 2, Ch. 6 R. 6.7.B(7) Bark Handling is an insignificant activity (IA).

### **3.5 Green Screen (AA-005)**

Particulate emissions will occur during screening of green wood chips. Emissions from the Green Screen were calculated based on the potential throughput and an emission factor for chip screening from the National Council for Air and Stream Improvement (NCASI) Technical Bulletin No. 1020.<sup>12</sup> Detailed potential emission calculations are included in Appendix C, Table 8.

### **3.6 Green Wood Storage Pile (AA-006) and Bark Storage Pile (IA)**

Particulate emission factors used to quantify emissions from storage pile wind erosion for the Green Wood Storage Pile and Bark Storage Pile were calculated based on EPA's *Control of Open Fugitive Dust Sources*.<sup>13</sup> The number of days with rainfall greater than 0.01 inch was obtained from AP-42 Section 13.2.2, *Unpaved Roads*<sup>14</sup>, and the percentage of time that wind speed exceeds 12 miles per hour (mph) was determined based on meteorological data from the Mobile/Bates Field National Weather Service (NWS) Station (KMOB) for 2013-2017. The mean silt content of 8.4% for unpaved roads at lumber mills from AP-42 Section 13.2.2 was conservatively applied in the absence of site-specific data. The exposed surface area of the piles was calculated based on expected worst-case pile dimensions.

VOC emissions from storage piles were quantified based on the exposed surface area of the pile and emission factors from NCASI. NCASI emission factors range from 1.6 to 3.6 pounds (lb) VOC as carbon/acre-day; however, emissions were conservatively based on the maximum emission factor. Detailed potential emission calculations are included in Appendix C, Table 9.

Per 11 Miss. Admin. Code Pt. 2, Ch. 6 R. 6.7.B(7) bark storage is an insignificant activity.

### **3.7 Dryers, Green Wood Hammermills, and Dryer System Double Duct Burners (IA)**

As described in Section 2, aside from normal operation there are several other potential operating conditions for the dryer lines. Emissions were quantified as described in the following subsections.

#### **3.7.1 Normal Operation (AA-007, AA-010, AA-013)**

During normal operation the exhaust from each dryer will be routed to a dedicated WESP and RTO for control of PM, VOC, and HAP. Exhaust from the Green Hammermills will be controlled by the WESP/RTO on Dryer Line 1 (ID# AA-007). If Dryer Line 1 is not operational, the Green Hammermill exhaust will be routed to the WESP/RTO on Dryer Line 2 (ID# AA-010). For purposes of potential emissions, emissions from the Green Hammermills are shown under Dryer Line 1 (ID# AA-007) only to avoid double-counting emissions. As shown in Appendix C, Tables 10a, 11a, and 12a, potential emissions of PM, PM less than 10

<sup>12</sup> National Council for Air and Stream Improvement, Inc. (NCASI). 2013. Compilation of criteria air pollutant emissions data for sources at pulp and paper mills including boilers – an update to Technical Bulletin No. 884. Technical Bulletin No. 1020. Research Triangle Park, NC: National Council for Air and Stream Improvement, Inc.

<sup>13</sup> U.S. EPA *Control of Open Fugitive Dust Sources*, Research Triangle Park, North Carolina, EPA-450/3-88-008. September 1988.

<sup>14</sup> U. S. EPA AP-42 Section 13.2.2, *Unpaved Roads* (11/06).



microns in diameter (PM<sub>10</sub>), PM less than 2.5 microns in diameter (PM<sub>2.5</sub>), carbon monoxide (CO) and oxides of nitrogen (NO<sub>x</sub>), including NO<sub>x</sub> and CO emissions generated during thermal oxidation, are based on vendor data, stack testing data from comparable Enviva facilities, and AP-42 factors where no other data were available. Potential emissions of sulfur dioxide (SO<sub>2</sub>) were calculated based on an emission factor from AP-42 Section 10.6.2, *Particle Board Manufacturing*.<sup>15</sup> VOC emissions are based on data provided by the RTO vendor and stack testing conducted at Enviva facilities.

HAP emissions were calculated based on emission factors from several data sources including stack testing data from other similar facilities and emission factors from AP-42 Section 1.6, *Wood Residue Combustion in Boilers*.<sup>16</sup> HAP emissions from natural gas and propane combustion by the RTO burners were calculated based on AP-42 Section 1.4, *Natural Gas Combustion* and emission factors from the South Coast Air Quality Management District's (SCAQMD) Air Emissions Reporting (AER) Tool, respectively.<sup>17,18</sup>

Combustion of wood by the dryer furnaces and natural gas/propane by the RTO burners will also result in emissions of GHG. GHG emissions were quantified based on emission factors from AP-42, Section 10.6.1 for a rotary dryer with an RTO control device. The potential CO<sub>2</sub> emissions were conservatively calculated using the higher hardwood emission factor because the dryers at the Lucedale plant will use a combination of hardwood and softwood.

As previously described, two (2) low-NO<sub>x</sub> burners will be used to heat the dryer system ducts to prevent condensation of wood tar from occurring and thus reduce the risk of fire. There will be six (6) total burners (i.e., two for each dryer line). The burners will combust natural gas, or propane as back-up, resulting in emissions of criteria pollutants, HAP, and GHG. Emissions from the burners will be routed to the WESP and RTO on each dryer line. For the purposes of determining potential annual emissions, the worst-case between natural gas and propane was selected on a pollutant-by-pollutant basis.

Potential criteria pollutant emissions from the burners were quantified based on emission factors from AP-42 Section 1.4, *Natural Gas Combustion* and AP-42 Section 1.5, *Liquefied Petroleum Gas Combustion*.<sup>19,20</sup> Potential SO<sub>2</sub> emissions from propane combustion assume a sulfur content of 0.54 grains per 100 cubic feet for propane.<sup>21</sup>

Potential HAP emissions from propane combustion by the burners were quantified based on emission factors from the SCAQMD's AER Tool for external combustion equipment fired with

<sup>15</sup> U.S. EPA AP-42 Section 10.6.2, *Particle Board Manufacturing* (6/02).

<sup>16</sup> U.S. EPA AP-42 Section 1.6, *Wood Residue Combustion in Boilers* (09/03).

<sup>17</sup> U.S. EPA AP-42 Section 1.4, *Natural Gas Combustion* (07/98).

<sup>18</sup> South Coast Air Quality Management District's (SCAQMD) Air Emissions Reporting (AER) Tool. Available online at: <http://www3.aqmd.gov/webappl/help/newaer/index.html>

<sup>19</sup> U.S. EPA AP-42 Section 1.4 *Natural Gas Combustion* (07/98).

<sup>20</sup> U.S. EPA AP-42 Section 1.5 *Liquefied Petroleum Gas Production* (7/08).

<sup>21</sup> *A National Methodology and Emission Inventory for Residential Fuel Combustion* (2001). Retrieved from <https://www3.epa.gov/ttnchie1/conference/ei12/area/haneke.pdf>.



LPG.<sup>22</sup> Potential HAP emissions from natural gas combustion were quantified based on emission factors from AP-42 Section 1.4, *Natural Gas Combustion*.<sup>23</sup>

Potential GHG emissions from the burners were quantified based on emission factors from AP-42 Section 1.4, *Natural Gas Combustion* and AP-42 Section 1.5, *Liquefied Petroleum Gas Combustion*.<sup>24,25</sup> Emissions were converted to CO<sub>2</sub>e based on Global Warming Potentials from Subpart A of 40 CFR 98. Potential emissions were quantified based on a rated capacity of 1 MMBtu/hr per burner and assume continuous operation (8,760 hours per year). A 95% control efficiency was applied to particulate and metal HAP which will be controlled by the WESPs and organic HAP which will be controlled by the RTO. Refer to Appendix C, Tables 10a, 11a, and 12a for detailed potential emission calculations.

The burners will be an insignificant activity per 11 Miss. Admin. Code Pt. 2, Ch. 6 R. 6.7.B(2).

### **3.7.2 Dryer Bypass (AA-008, AA-011, AA-014, Full Capacity)**

Bypass stacks following each furnace (AA-009, AA-012, and AA-015, Furnace Bypass Stack Nos. 1, 2, and 3) and rotary drum dryer (AA-008, AA-011, and AA-014, Dryer Bypass Stack Nos. 1, 2, and 3) will be used to exhaust hot gases during start-up (for temperature control), shutdown, and malfunctions. Potential emissions associated with dryer bypass were calculated based on stack testing data from comparable Enviva facilities. Condensable PM and SO<sub>2</sub> emissions were calculated based on emission factors from AP-42 Section 1.6, *Wood Residue Combustion in Boilers*.<sup>26</sup> Filterable PM and HAP emissions were calculated based on stack testing data from a comparable Enviva plant. Emissions were based on the full capacity of the furnaces (168 MMBtu/hr) and 50 hours per year per dryer. Detailed potential emission calculations are included in Appendix C, Tables 10b, 11b, and 12b.

### **3.7.3 Furnace Bypass (AA-009, AA-012, AA-015, Full Capacity)**

Potential emissions of CO, NO<sub>x</sub>, SO<sub>2</sub>, VOC and HAP for furnace bypass conditions were calculated based on emission factors from AP-42 Section 1.6, *Wood Residue Combustion in Boilers*.<sup>27</sup> Filterable PM emissions were calculated based on stack testing data from a comparable Enviva plant. Emissions were based on the full capacity of the furnaces (168 MMBtu/hr) and 50 hours per year per furnace. Detailed potential emission calculations are included in Appendix C, Tables 10c, 11c, and 12c.

### **3.7.4 Furnace Bypass (AA-009, AA-012, AA-015, Idle Mode)**

Each furnace will operate up to 500 hours per year in "idle mode", which is defined as operation up to a maximum heat input rate of 5 MMBtu/hr. During this time, emissions will exhaust out of the furnace bypass stacks. Potential emissions of CO, NO<sub>x</sub>, SO<sub>2</sub>, VOC, and HAP were calculated based on emission factors from AP-42 Section 1.6, *Wood Residue*

<sup>22</sup> South Coast Air Quality Management District. AER Reporting tool. Emission factors available in the Help and Support Manual at: <http://www.aqmd.gov/home/rules-compliance/compliance/annual-emission-reporting>.

<sup>23</sup> U.S. EPA AP-42 Section 1.4 *Natural Gas Combustion* (07/98).

<sup>24</sup> U.S. EPA AP-42 Section 1.4 *Natural Gas Combustion* (07/98).

<sup>25</sup> U.S. EPA AP-42 Section 1.5 *Liquefied Petroleum Gas Production* (7/08).

<sup>26</sup> U.S. EPA AP-42, Section 1.6, *Wood Residue Combustion in Boilers*, (09/03).

<sup>27</sup> Ibid.



*Combustion in Boilers.*<sup>28</sup> Detailed potential emission calculations are included in Appendix C, Tables 10d, 11d, and 12d.

### **3.8 Pelletizing Lines (AA-016 and AA-017)**

As previously described, the Lucedale plant will include two (2) pelletizing lines, each consisting of twenty-four (24) Dry Hammermills, twelve (12) Pellet Mills, and six (6) Pellet Coolers. Aspiration systems will be used to remove heated moist air from the Dry Hammermills, Pellet Mills, and Coolers. The aspiration systems will also keep the dried wood and Dry Hammermill outfeed conveyors and the Pellet Mill Feed Silo under negative pressure. These aspiration systems will be routed to material handling cyclones and then wet scrubbers and RCOs for emissions control.

The Dry Hammermill, Pellet Mill, and Pellet Cooler operations will generate PM, HAP, and VOC emissions during the sizing of wood chips and forming and cooling of wood pellets. VOC, HAP, and PM emissions from Pelletizing Lines 1 and 2 will be controlled by two (2) wet scrubbers and RCOs (ID# AA-016 and AA-017). PM and VOC emissions from the RCO outlets were calculated based on vendor data.

HAP emissions at the RCO outlets were quantified based on stack testing data from comparable Enviva plants. Controlled emissions were estimated based on a 96.3% control efficiency for the RCOs based on vendor data. NO<sub>x</sub> and CO emissions resulting from thermal oxidation were calculated using AP-42 Section 1.4, *Natural Gas Combustion*, and the maximum high heating value of the anticipated VOC constituents.<sup>29</sup> Detailed calculations are provided in Appendix C, Tables 13 and 14.

Emissions of criteria pollutants and HAP from natural gas/propane combustion by the RCO burners were estimated using emission factors from AP-42 Section 1.4 and the SCAQMD's AER Tool.<sup>30</sup> Potential GHG emissions from natural gas/propane combustion were quantified based on emission factors from Subpart C of 40 CFR Part 98. Emissions were converted to carbon dioxide equivalent (CO<sub>2</sub>e) based on Global Warming Potentials from Subpart A of 40 CFR 98.

### **3.9 Pellet Loadout Bins and Finished Product Handling (AA-018)**

PM emissions will result from the transfer of finished product to the Pellet Loadout Bins. No emissions are anticipated from the transfer of pellets from the bins to railcars because wood pellets will be loaded into closed top railcars. PM emissions from Finished Product Handling and the two (2) Pellet Loadout Bins will be controlled by a baghouse (ID# AA-018). Potential PM emissions from the baghouse were calculated based on a maximum exit grain loading rate and the maximum exhaust flow rate of the baghouse. Detailed potential emissions calculations are provided in Appendix C, Table 15.

### **3.10 Additive Handling and Storage (AA-019)**

A dry powder additive will be used in the pellet production process to serve as a lubricant for the dies. Additive will be pneumatically conveyed from trucks to a storage silo equipped with a baghouse. PM emissions from the baghouse were calculated based on an assumed exit

<sup>28</sup> Ibid.

<sup>29</sup> U.S. EPA AP-42 Section 1.4, *Natural Gas Combustion* (07/98).

<sup>30</sup> South Coast Air Quality Management District's (SCAQMD) Air Emissions Reporting (AER) Tool. Available online at: <http://www3.aqmd.gov/webappl/help/newaer/index.html>



grain loading rate and the maximum exhaust flow rate of the baghouse. Detailed potential emissions calculations are provided in Appendix C, Table 15.

### **3.11 Dry Shavings Silo (AA-020) and Dry Shavings Handling (AA-021)**

Particulate emissions will occur during unloading of dry shavings from trucks and may also occur due to displacement of air during silo loading. Potential emissions from truck unloading (ID# AA-021) were calculated based on AP-42, Section 13.2.4, *Aggregate Handling and Storage Piles*.<sup>31</sup> Dry shavings will be transferred via an enclosed bucket elevator into the Dry Shavings Silo which will be equipped with a baghouse (ID# AA-020). PM emissions from the baghouse were calculated based on an assumed exit grain loading rate and the maximum exhaust flow rate of the baghouse. Detailed potential emission calculations are provided in Appendix C, Tables 7 and 15.

### **3.12 Emergency Generator (AA-022) and Fire Water Pump Engine (AA-023)**

Operation of the Emergency Generator and Fire Water Pump will generate emissions of criteria pollutants, HAP, and GHG. Potential PM, NO<sub>x</sub>, VOC, and CO emissions from operation of the Emergency Generator and Fire Water Pump Engine were calculated based on emission factors from their respective manufacturer specification sheets and the maximum horsepower rating of the engines. VOC emissions were calculated based on the manufacturer's emission factor for hydrocarbons. Potential SO<sub>2</sub> emissions were calculated based on the fuel sulfur restriction in NSPS Subpart IIII, assuming that all the sulfur present in the diesel fuel is emitted as SO<sub>2</sub>.<sup>32</sup> Potential HAP emissions from the Emergency Generator and Fire Water Pump were quantified based on emission factors from AP-42 Sections 3.4, *Large Stationary Diesel and All Stationary Dual-fuel Engines* and 3.3, *Gasoline and Diesel Industrial Engines*, respectively.<sup>33,34</sup> Annual potential emissions were conservatively calculated based on operation of these sources for 500 hours per year.

Combustion of diesel fuel by the engines will also result in emissions of GHG. Potential GHG emissions from each engine were quantified based on emission factors from Subpart C of 40 CFR Part 98. Emissions were converted to CO<sub>2</sub>e based on Global Warming Potentials from Subpart A of 40 CFR 98. Refer to Appendix C, Tables 16 and 17 for detailed potential emission calculations.

### **3.13 Diesel Storage Tanks (IA)**

The storage of diesel in on-site storage tanks will generate emissions of VOC. VOC emissions from the three (3) Diesel Storage Tanks were calculated using EPA's TANKS 4.0 software based on actual tank characteristics (e.g., orientation, dimensions, etc.) and potential annual throughput. The storage tanks will exclusively store diesel fuel and are thus considered insignificant activities per 11 Miss. Admin. Code Pt. 2 Ch. 6 R. 6.7.B(7). Refer to Appendix C, Table 19 for detailed potential emission calculations.

### **3.14 Paved Roads (AA-024)**

Fugitive PM emissions will occur as a result of trucks and employee vehicles traveling on paved roads on the Lucedale plant property. Emission factors were calculated based on

<sup>31</sup> U.S. EPA AP-42 Section 13.2.4, *Aggregate Handling and Storage Piles* (11/06).

<sup>32</sup> Sulfur content in accordance with Year 2010 standards of 40 CFR 80.510(b) as required by NSPS Subpart IIII.

<sup>33</sup> U.S. EPA AP-42 Section 3.4, *Large Stationary Diesel and All Stationary Dual-fuel Engines*, (10/96).

<sup>34</sup> U.S. EPA AP-42 Section 3.3, *Gasoline and Diesel Industrial Engines*, (10/96).



Equation 2 from AP-42 Section 13.2.1, *Paved Roads*<sup>35</sup> using the mean silt loading for quarries (8.2 g/m<sup>2</sup>) and 110 days with rainfall greater than 0.01 inch based on Figure 13.2.1-2. A 90% control efficiency was applied for water/dust suppression activities followed by sweeping. This control efficiency is based on data from the *Air Pollution Engineering Manual* of the Air and Waste Management Association. Refer to Appendix C, Table 18 for detailed potential emissions calculations.

### **3.15 Propane Vaporizer (IA)**

The direct-fired Propane Vaporizer will be used to heat liquid propane to convert it to a gas for combustion by the RTO burners, RCO burners, and dryer system double duct burners. Combustion of propane by the vaporizer's 1 MMBtu/hr burner will result in emissions of criteria pollutants, HAP, and GHG. Potential criteria pollutant emissions were quantified based on emission factors from AP-42 Section 1.5, *Liquefied Petroleum Gas Combustion*.<sup>36</sup> Potential SO<sub>2</sub> emissions assume a sulfur content of 0.54 grains per 100 cubic feet for propane.<sup>37</sup> Potential HAP emissions were quantified based on emission factors from the SCAQMD's AER Tool for external combustion equipment fired with LPG.<sup>38</sup>

Potential GHG emissions were quantified based on emission factors from AP-42 Section 1.5, *Liquefied Petroleum Gas Combustion*.<sup>39</sup> Emissions were converted to CO<sub>2</sub>e based on Global Warming Potentials from Subpart A of 40 CFR 98. Potential emissions from the Propane Vaporizer were quantified based on a rated capacity of 1 MMBtu/hr and assume continuous operation (8,760 hours per year). Refer to Appendix C, Table 20 for detailed potential emission calculations.

The Propane Vaporizer will be an insignificant activity per 11 Miss. Admin. Code Pt. 2, Ch. 6 R. 6.7.B(2).

<sup>35</sup> U.S. EPA AP-42 Section 13.2.1, *Paved Roads* (01/11).

<sup>36</sup> U.S. EPA AP-42 Section 1.5 *Liquefied Petroleum Gas Production* (7/08).

<sup>37</sup> *A National Methodology and Emission Inventory for Residential Fuel Combustion* (2001). Retrieved from <https://www3.epa.gov/ttnchie1/conference/ei12/area/haneke.pdf>.

<sup>38</sup> South Coast Air Quality Management District. AER Reporting tool. Emission factors available in the Help and Support Manual at: <http://www.aqmd.gov/home/rules-compliance/compliance/annual-emission-reporting>.

<sup>39</sup> U.S. EPA AP-42 Section 1.5 *Liquefied Petroleum Gas Production* (7/08).



## **APPENDIX C POTENTIAL EMISSIONS CALCULATIONS**

**Table 1**  
**Calculation Inputs**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

| Operational Data                     |           |
|--------------------------------------|-----------|
| <b>Facility-wide</b>                 |           |
| Production (ODT/yr)                  | 1,420,539 |
| Moisture Content of Finished Pellets | 5.5%      |
| Softwood Composition                 | 85%       |
| <b>Green Hammermills</b>             |           |
| Short-Term Throughput (ODT/hr)       | 159       |
| Annual Throughput (ODT/yr)           | 1,390,475 |
| Hours of Operation (hr/yr)           | 8,760     |
| <b>Dryers (Per Dryer)</b>            |           |
| Number of Dryers                     | 3         |
| Short-Term Throughput (ODT/hr)       | 42        |
| Annual Throughput (ODT/yr)           | 367,920   |
| Hourly Heat Input Capacity           | 168       |
| Annual Heat Input Capacity           | 1,471,680 |
| Hours of Operation (hr/yr)           | 8,760     |
| <b>Dry Hammermills</b>               |           |
| Short-Term Throughput (ODT/hr)       | 162       |
| Annual Throughput (ODT/yr)           | 1,420,539 |
| Hours of Operation (hr/yr)           | 8,760     |
| <b>Pellet Mills/Coolers</b>          |           |
| Short-Term Throughput (ODT/hr)       | 162       |
| Annual Throughput (ODT/yr)           | 1,420,539 |
| Hours of Operation (hr/yr)           | 8,760     |



**Table 2**  
**Summary of Facility-wide Potential Emissions**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

| Emission Point ID                             | Source Description                                                                                                                  | Control Device Description | CO (tpy)   | NO <sub>x</sub> (tpy) | PM (tpy)   | PM <sub>10</sub> (tpy) | PM <sub>2.5</sub> (tpy) | SO <sub>2</sub> (tpy) | VOC (tpy)  | CO <sub>2</sub> e (tpy) | Total HAP (tpy) |
|-----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|----------------------------|------------|-----------------------|------------|------------------------|-------------------------|-----------------------|------------|-------------------------|-----------------|
| AA-001                                        | Debarker                                                                                                                            | --                         | --         | --                    | 20.9       | 11.5                   | --                      | --                    | --         | --                      | --              |
| AA-002                                        | Log Chipping                                                                                                                        | --                         | --         | --                    | --         | --                     | --                      | --                    | 2.19       | --                      | 0.44            |
| AA-003                                        | Bark Hog                                                                                                                            | --                         | --         | --                    | 9.91       | 5.45                   | --                      | --                    | 1.36       | --                      | 0.27            |
| IA <sup>1</sup>                               | Bark Handling Operations                                                                                                            | --                         | --         | --                    | 0.039      | 0.018                  | 0.0028                  | --                    | --         | --                      | --              |
| IA <sup>1</sup>                               | Bark Storage Pile                                                                                                                   | --                         | --         | --                    | 1.81       | 0.91                   | 0.14                    | --                    | 0.82       | --                      | --              |
| AA-004                                        | Green Wood Handling Operations                                                                                                      | --                         | --         | --                    | 0.19       | 0.088                  | 0.013                   | --                    | --         | --                      | --              |
| AA-005                                        | Green Screen                                                                                                                        | --                         | --         | --                    | 2.64       | 2.64                   | 2.64                    | --                    | --         | --                      | --              |
| AA-006                                        | Green Wood Storage Pile                                                                                                             | --                         | --         | --                    | 3.88       | 1.94                   | 0.29                    | --                    | 1.76       | --                      | --              |
| AA-007 <sup>2,3</sup>                         | One (1) 168 MMBtu/hr Wood-fired Direct Heat Drying System; Three (3) Green Hammermills; Two (2) 1 MMBtu/hr Burners for Double Ducts | WESP-1; RTO-1              | 62.9       | 75.1                  | 33.1       | 33.1                   | 33.1                    | 18.4                  | 50.1       | 144,712                 | 9.25            |
| AA-008                                        | Dryer 1 Bypass Stack                                                                                                                | --                         | 0.54       | 0.66                  | 1.46       | 1.46                   | 1.46                    | 0.11                  | 0.35       | 880                     | 0.50            |
| AA-009                                        | Furnace 1 Bypass Stack                                                                                                              | --                         | 3.27       | 1.20                  | 3.05       | 3.00                   | 2.91                    | 0.14                  | 0.09       | 1,142                   | 0.17            |
| AA-010 <sup>2,3</sup>                         | One (1) 168 MMBtu/hr Wood-fired Direct Heat Drying System; Two (2) 1 MMBtu/hr Burners for Double Ducts                              | WESP-2; RTO-2              | 62.9       | 75.1                  | 33.1       | 33.1                   | 33.1                    | 18.4                  | 38.3       | 144,712                 | 6.21            |
| AA-011                                        | Dryer 2 Bypass Stack                                                                                                                | --                         | 0.54       | 0.66                  | 1.46       | 1.46                   | 1.46                    | 0.11                  | 0.35       | 880                     | 0.50            |
| AA-012                                        | Furnace 2 Bypass Stack                                                                                                              | --                         | 3.27       | 1.20                  | 3.05       | 3.00                   | 2.91                    | 0.14                  | 0.09       | 1,142                   | 0.17            |
| AA-013 <sup>3</sup>                           | One (1) 168 MMBtu/hr Wood-fired Direct Heat Drying System; Two (2) 1 MMBtu/hr Burners for Double Ducts                              | WESP-3; RTO-3              | 62.9       | 75.1                  | 33.1       | 33.1                   | 33.1                    | 18.4                  | 38.3       | 144,712                 | 6.21            |
| AA-014                                        | Dryer 3 Bypass Stack                                                                                                                | --                         | 0.54       | 0.66                  | 1.46       | 1.46                   | 1.46                    | 0.11                  | 0.35       | 880                     | 0.50            |
| AA-015                                        | Furnace 3 Bypass Stack                                                                                                              | --                         | 3.27       | 1.20                  | 3.05       | 3.00                   | 2.91                    | 0.14                  | 0.09       | 1,142                   | 0.17            |
| AA-016                                        | Thirty-two (32) Dry Hammermills; Sixteen (16) Pellet Mills, Eight (8) Pellet Coolers                                                | Wet Scrubber-1; RCO-1      | 4.93       | 6.04                  | 9.67       | 9.67                   | 9.67                    | 0.025                 | 34.3       | 6,334                   | 7.56            |
| AA-017                                        | Sixteen (16) Dry Hammermills; Eight (8) Pellet Mills, Four (4) Pellet Coolers                                                       | Wet Scrubber-2; RCO-2      | 2.36       | 5.21                  | 4.83       | 4.83                   | 4.83                    | 0.012                 | 17.2       | 2,973                   | 3.78            |
| AA-018                                        | Finished Product Handling<br>Two (2) Pellet Loadout Bins                                                                            | One (1) baghouse           | --         | --                    | 0.45       | 0.41                   | 0.0077                  | --                    | --         | --                      | --              |
| AA-019                                        | Additive Handling and Storage                                                                                                       | One (1) baghouse           | --         | --                    | 0.15       | 0.15                   | 0.15                    | --                    | --         | --                      | --              |
| AA-020                                        | Dry Shavings Silo                                                                                                                   | One (1) baghouse           | --         | --                    | 0.15       | 0.15                   | 0.15                    | --                    | --         | --                      | --              |
| AA-021                                        | Dry Shavings Handling                                                                                                               | --                         | --         | --                    | 0.17       | 0.08                   | 0.012                   | --                    | --         | --                      | --              |
| IA <sup>4</sup>                               | 500 gallon Diesel Storage Tank                                                                                                      | --                         | --         | --                    | --         | --                     | --                      | --                    | 2.10E-04   | --                      | --              |
| IA <sup>4</sup>                               | 185 gallon Diesel Storage Tank                                                                                                      | --                         | --         | --                    | --         | --                     | --                      | --                    | 1.85E-04   | --                      | --              |
| IA <sup>4</sup>                               | 5,000 gallon Diesel Storage Tank                                                                                                    | --                         | --         | --                    | --         | --                     | --                      | --                    | 0.0038     | --                      | --              |
| AA-022                                        | 500 kW Diesel-fired Emergency Generator                                                                                             | --                         | 0.14       | 2.46                  | 0.0078     | 0.0078                 | 0.0078                  | 6.63E-04              | 1.68       | 179                     | 0.0017          |
| AA-023                                        | 131 hp Diesel-fired Fire Water Pump                                                                                                 | --                         | 0.070      | 0.18                  | 0.0092     | 0.0092                 | 0.0092                  | 4.79E-04              | 0.0081     | 50.4                    | 8.88E-04        |
| AA-024                                        | Paved Roads                                                                                                                         | --                         | --         | --                    | 8.81       | 1.76                   | 0.43                    | --                    | --         | --                      | --              |
| IA <sup>5</sup>                               | Propane Vaporizer                                                                                                                   | --                         | 0.36       | 0.62                  | 0.034      | 0.034                  | 0.034                   | 0.0026                | 0.048      | 611                     | 0.010           |
| <b>Total Emissions:</b>                       |                                                                                                                                     |                            | <b>208</b> | <b>245</b>            | <b>176</b> | <b>152</b>             | <b>131</b>              | <b>56.0</b>           | <b>187</b> | <b>450,350</b>          | <b>35.8</b>     |
| <b>Total Excluding Fugitives<sup>5</sup>:</b> |                                                                                                                                     |                            | <b>208</b> | <b>245</b>            | <b>159</b> | <b>145</b>             | <b>127</b>              | <b>56.0</b>           | <b>185</b> | <b>450,350</b>          | <b>35.8</b>     |
| <b>PSD Major Source Threshold:</b>            |                                                                                                                                     |                            | <b>250</b> | <b>250</b>            | <b>250</b> | <b>250</b>             | <b>250</b>              | <b>250</b>            | <b>250</b> | <b>--</b>               | <b>--</b>       |

**Notes:**

- Bark storage and handling is considered an insignificant activity per 11 Miss. Admin. Code Pt. 2 Ch. 6 R. 6.7.B(13).
- The three (3) Green Hammermills will be controlled by the WESP and RTO on Dryer Line 1. If Dryer Line 1 is not operational, the Green Hammermill exhaust will be routed to the WESP/RTO on Dryer Line 2. For potential emissions purposes, emissions from the Green Hammermills are shown under Dryer Line 1 (AA-007) only to avoid double-counting emissions.
- The propane vaporizer and six (6) burners for the dryer line double duct systems are considered insignificant activities per 11 Miss. Admin. Code Pt. 2 Ch. 6 R. 6.7.B(2).
- Storage tanks used exclusively to store diesel are considered an insignificant activity per 11 Miss. Admin. Code Pt. 2 Ch. 1 R. 6.7.B(7).
- Fugitive emissions are not included in comparison against the major source threshold because the facility is not on the list of 28 source categories in 40 CFR 52.21.

**Abbreviations:**

CO - carbon monoxide  
CO<sub>2</sub>e - carbon dioxide equivalent  
IA - Insignificant Activity  
NO<sub>x</sub> - nitrogen oxides  
PM - particulate matter  
PM<sub>10</sub> - particulate matter with an aerodynamic diameter less than 10 microns  
PM<sub>2.5</sub> - particulate matter with an aerodynamic diameter of 2.5 microns or less

RCO - Regenerative Catalytic Oxidizer  
RTO - Regenerative Thermal Oxidizer  
SO<sub>2</sub> - sulfur dioxide  
tpy - tons per year  
VOC - volatile organic compounds  
WESP - Wet Electrostatic Precipitator



Table 3  
Summary of Facility-wide HAP Emissions  
Envia Pellets Lumbago, LLC  
Lumbago, Georgia County, Mississippi

| Pollutant                                     | Log Chipping<br>AA-002<br>(tpy) | Bark Hog<br>AA-003<br>(tpy) | ATO-1<br>AA-007 <sup>1</sup><br>(tpy) | Dryer 1<br>Bypass<br>AA-008<br>(tpy) | Furnace 1<br>Bypass<br>AA-009<br>(tpy) | ATO-2<br>AA-010 <sup>1</sup><br>(tpy) | Dryer 2<br>Bypass<br>AA-011<br>(tpy) | Furnace 2<br>Bypass<br>AA-012<br>(tpy) | ATO-3<br>AA-013 <sup>1</sup><br>(tpy) | Dryer 3<br>Bypass<br>AA-014<br>(tpy) | Furnace 3<br>Bypass<br>AA-015<br>(tpy) | RCO-1<br>AA-016 <sup>1</sup><br>(tpy) | RCO-2<br>AA-017 <sup>1</sup><br>(tpy) | Emergency<br>Generator<br>AA-022<br>(tpy) | Fire Water<br>Pump<br>AA-023<br>(tpy) | Propane<br>Vaporizer<br>AA<br>(tpy) | Total HAP<br>(tpy) |
|-----------------------------------------------|---------------------------------|-----------------------------|---------------------------------------|--------------------------------------|----------------------------------------|---------------------------------------|--------------------------------------|----------------------------------------|---------------------------------------|--------------------------------------|----------------------------------------|---------------------------------------|---------------------------------------|-------------------------------------------|---------------------------------------|-------------------------------------|--------------------|
| Acetaldehyde                                  | ---                             | ---                         | 1.48                                  | 0.10                                 | 0.0045                                 | 0.90                                  | 0.10                                 | 0.0045                                 | 0.90                                  | 0.10                                 | 0.0045                                 | 0.31                                  | 0.15                                  | 2.750-05                                  | 1.762-04                              | ---                                 | 4.08               |
| Acetophenone                                  | ---                             | ---                         | 1.185-07                              | 1.345-08                             | 1.745-08                               | 1.185-07                              | 1.345-08                             | 1.745-08                               | 1.185-07                              | 1.345-08                             | 1.745-08                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 4.460-07           |
| Acron                                         | ---                             | ---                         | 0.95                                  | 0.81                                 | 0.022                                  | 2.41                                  | 0.51                                 | 0.022                                  | 2.41                                  | 0.51                                 | 0.022                                  | 0.54                                  | 0.54                                  | 8.615-06                                  | 2.125-05                              | ---                                 | 3.71               |
| Aromatic compounds                            | ---                             | ---                         | 2.915-04                              | 3.325-05                             | 4.315-05                               | 2.915-04                              | 3.325-05                             | 4.315-05                               | 2.915-04                              | 3.325-05                             | 4.315-05                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 0.0013             |
| Aromatic compounds                            | ---                             | ---                         | 8.235-04                              | 9.245-05                             | 1.205-04                               | 8.235-04                              | 9.245-05                             | 1.205-04                               | 8.235-04                              | 9.245-05                             | 1.205-04                               | 8.425-04                              | 3.915-04                              | ---                                       | ---                                   | ---                                 | 0.0031             |
| Benzene                                       | ---                             | ---                         | 0.20                                  | ---                                  | ---                                    | 0.20                                  | ---                                  | ---                                    | 0.20                                  | ---                                  | ---                                    | 1.515-02                              | 1.435-03                              | 8.480-04                                  | 2.540-04                              | 0.0031                              | 0.66               |
| Benzaldehyde                                  | ---                             | ---                         | 9.475-05                              | 1.080-05                             | 2.425-05                               | 9.475-05                              | 1.080-05                             | 2.425-05                               | 9.475-05                              | 1.080-05                             | 2.425-05                               | 9.555-08                              | 2.375-08                              | 2.815-07                                  | 4.315-08                              | ---                                 | 3.630-04           |
| Beryllium metal                               | ---                             | ---                         | 4.135-05                              | 4.625-08                             | 6.025-08                               | 4.135-05                              | 4.625-08                             | 6.025-08                               | 4.135-05                              | 4.625-08                             | 6.025-08                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 1.560-04           |
| Butadiene, 1,3                                | ---                             | ---                         | ---                                   | ---                                  | ---                                    | ---                                   | ---                                  | ---                                    | ---                                   | ---                                  | ---                                    | ---                                   | ---                                   | ---                                       | 8.965-06                              | ---                                 | 8.965-06           |
| Cadmium metal                                 | ---                             | ---                         | 2.275-04                              | 1.725-05                             | 2.235-05                               | 2.275-04                              | 1.725-05                             | 2.235-05                               | 2.275-04                              | 1.725-05                             | 2.235-05                               | 4.815-05                              | 2.175-05                              | ---                                       | ---                                   | ---                                 | 8.675-04           |
| Carbon tetrachloride                          | ---                             | ---                         | 0.0017                                | 1.895-04                             | 2.455-04                               | 0.0017                                | 1.895-04                             | 2.455-04                               | 0.0017                                | 1.895-04                             | 2.455-04                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 0.0063             |
| Chlorine                                      | ---                             | ---                         | 0.58                                  | 0.0037                               | 0.0043                                 | 0.58                                  | 0.0037                               | 0.0043                                 | 0.58                                  | 0.0037                               | 0.0043                                 | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 1.77               |
| Chlorobenzene                                 | ---                             | ---                         | 0.0012                                | 1.395-04                             | 1.805-04                               | 0.0012                                | 1.395-04                             | 1.805-04                               | 0.0012                                | 1.395-04                             | 1.805-04                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 0.0048             |
| Chloroform                                    | ---                             | ---                         | 0.0010                                | ---                                  | ---                                    | 0.0010                                | ---                                  | ---                                    | 0.0010                                | ---                                  | ---                                    | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 0.0031             |
| Chromium VI                                   | ---                             | ---                         | 9.885-05                              | ---                                  | ---                                    | 9.885-05                              | ---                                  | ---                                    | 9.885-05                              | ---                                  | ---                                    | 9.885-05                              | 2.775-05                              | ---                                       | ---                                   | ---                                 | 3.775-04           |
| Chromium-Other compounds                      | ---                             | ---                         | 8.445-04                              | 7.335-05                             | 9.985-05                               | 8.445-04                              | 7.335-05                             | 9.985-05                               | 8.445-04                              | 7.335-05                             | 9.985-05                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 0.0025             |
| Cobalt compounds                              | ---                             | ---                         | 2.495-04                              | 2.735-05                             | 3.545-05                               | 2.495-04                              | 2.735-05                             | 3.545-05                               | 2.495-04                              | 2.735-05                             | 3.545-05                               | 3.535-05                              | 1.665-06                              | ---                                       | ---                                   | ---                                 | 9.285-04           |
| Cyclohexanone                                 | ---                             | ---                         | 8.305-05                              | ---                                  | ---                                    | 8.305-05                              | ---                                  | ---                                    | 8.305-05                              | ---                                  | ---                                    | 5.055-05                              | 2.375-05                              | ---                                       | ---                                   | ---                                 | 1.235-04           |
| Dichloroethane, 1,2-                          | ---                             | ---                         | 0.0011                                | 1.225-04                             | 1.585-04                               | 0.0011                                | 1.225-04                             | 1.585-04                               | 0.0011                                | 1.225-04                             | 1.585-04                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 0.0040             |
| Dichloroethylene, 1,1-                        | ---                             | ---                         | 0.0012                                | 1.395-04                             | 1.805-04                               | 0.0012                                | 1.395-04                             | 1.805-04                               | 0.0012                                | 1.395-04                             | 1.805-04                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 0.0048             |
| Dichlorophenol, 2,4-                          | ---                             | ---                         | 6.625-06                              | 7.585-07                             | 9.815-07                               | 6.625-06                              | 7.585-07                             | 9.815-07                               | 6.625-06                              | 7.585-07                             | 9.815-07                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 2.515-05           |
| Di-2-ethylhexylphthalate                      | ---                             | ---                         | 1.735-05                              | 1.975-07                             | 2.585-07                               | 1.735-05                              | 1.975-07                             | 2.585-07                               | 1.735-05                              | 1.975-07                             | 2.585-07                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 6.535-06           |
| Ethyl benzene                                 | ---                             | ---                         | 0.0011                                | 1.305-04                             | 1.695-04                               | 0.0011                                | 1.305-04                             | 1.695-04                               | 0.0011                                | 1.305-04                             | 1.695-04                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 0.0043             |
| Formaldehyde                                  | ---                             | ---                         | 0.71                                  | 0.060                                | 0.024                                  | 0.71                                  | 0.060                                | 0.024                                  | 0.71                                  | 0.060                                | 0.024                                  | 0.71                                  | 0.17                                  | 8.625-05                                  | 2.715-04                              | 0.0066                              | 3.35               |
| Heptane                                       | ---                             | ---                         | 0.12                                  | ---                                  | ---                                    | 0.12                                  | ---                                  | ---                                    | 0.12                                  | ---                                  | ---                                    | 0.076                                 | 0.038                                 | ---                                       | ---                                   | ---                                 | 0.48               |
| Hydrochloric acid                             | ---                             | ---                         | 1.40                                  | 0.080                                | 0.10                                   | 1.40                                  | 0.080                                | 0.10                                   | 1.40                                  | 0.080                                | 0.10                                   | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 4.74               |
| Lead and lead compounds                       | ---                             | ---                         | 0.0018                                | 2.025-04                             | 2.625-04                               | 0.0018                                | 2.025-04                             | 2.625-04                               | 0.0018                                | 2.025-04                             | 2.625-04                               | 2.105-05                              | 9.885-06                              | ---                                       | ---                                   | ---                                 | 0.0068             |
| Manganese and compounds                       | ---                             | ---                         | 0.04                                  | 0.0087                               | 0.0087                                 | 0.04                                  | 0.0087                               | 0.0087                                 | 0.04                                  | 0.0087                               | 0.0087                                 | 1.405-05                              | 7.515-04                              | ---                                       | ---                                   | ---                                 | 0.22               |
| Mercury                                       | ---                             | ---                         | 1.475-04                              | 1.475-05                             | 1.915-05                               | 1.475-04                              | 1.475-05                             | 1.915-05                               | 1.475-04                              | 1.475-05                             | 1.915-05                               | 1.085-05                              | 5.145-06                              | ---                                       | ---                                   | ---                                 | 9.585-04           |
| Methanol                                      | 0.44                            | 0.27                        | 2.41                                  | 0.089                                | ---                                    | 0.78                                  | 0.089                                | ---                                    | 0.78                                  | 0.089                                | ---                                    | 4.37                                  | 2.18                                  | ---                                       | ---                                   | ---                                 | 11.8               |
| Methyl bromide                                | ---                             | ---                         | 5.525-04                              | 6.305-05                             | 8.185-05                               | 5.525-04                              | 6.305-05                             | 8.185-05                               | 5.525-04                              | 6.305-05                             | 8.185-05                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 0.0021             |
| Methyl chloride                               | ---                             | ---                         | 8.465-04                              | 8.665-05                             | 1.235-04                               | 8.465-04                              | 8.665-05                             | 1.235-04                               | 8.465-04                              | 8.665-05                             | 1.235-04                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 0.0032             |
| Methylene chloride                            | ---                             | ---                         | 0.021                                 | ---                                  | ---                                    | 0.021                                 | ---                                  | ---                                    | 0.021                                 | ---                                  | ---                                    | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 0.002              |
| Naphthalene                                   | ---                             | ---                         | 0.0036                                | 4.075-04                             | 5.295-04                               | 0.0036                                | 4.075-04                             | 5.295-04                               | 0.0036                                | 4.075-04                             | 5.295-04                               | 2.975-05                              | 1.205-05                              | 1.425-04                                  | 1.955-05                              | ---                                 | 0.014              |
| Nickel metal                                  | ---                             | ---                         | 0.0014                                | 1.395-04                             | 1.805-04                               | 0.0014                                | 1.395-04                             | 1.805-04                               | 0.0014                                | 1.395-04                             | 1.805-04                               | 8.845-05                              | 4.155-05                              | ---                                       | ---                                   | ---                                 | 0.0072             |
| Nitrophenol, 4-                               | ---                             | ---                         | 4.055-06                              | 4.615-07                             | 6.025-07                               | 4.055-06                              | 4.615-07                             | 6.025-07                               | 4.055-06                              | 4.615-07                             | 6.025-07                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 1.635-05           |
| Octachlorophenol                              | ---                             | ---                         | 3.755-05                              | 2.145-07                             | 2.785-07                               | 3.755-05                              | 2.145-07                             | 2.785-07                               | 3.755-05                              | 2.145-07                             | 2.785-07                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 1.145-04           |
| Octachlorobiphenyl                            | ---                             | ---                         | 0.028                                 | 1.805-04                             | 2.075-04                               | 0.028                                 | 1.805-04                             | 2.075-04                               | 0.028                                 | 1.805-04                             | 2.075-04                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 0.085              |
| Phenol                                        | ---                             | ---                         | 0.87                                  | 0.081                                | 2.785-04                               | 0.71                                  | 0.081                                | 2.785-04                               | 0.71                                  | 0.081                                | 2.785-04                               | 0.51                                  | 0.26                                  | ---                                       | ---                                   | ---                                 | 3.30               |
| Phosphorus metal, yellow or white             | ---                             | ---                         | 9.935-04                              | 1.135-04                             | 1.475-04                               | 9.935-04                              | 1.135-04                             | 1.475-04                               | 9.935-04                              | 1.135-04                             | 1.475-04                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 0.0038             |
| Polychlorinated biphenyls                     | ---                             | ---                         | 3.555-07                              | 3.425-08                             | 4.445-08                               | 3.555-07                              | 3.425-08                             | 4.445-08                               | 3.555-07                              | 3.425-08                             | 4.445-08                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 1.145-04           |
| Propionaldehyde                               | ---                             | ---                         | 0.30                                  | 0.029                                | 3.325-04                               | 0.26                                  | 0.029                                | 3.325-04                               | 0.26                                  | 0.029                                | 3.325-04                               | 0.52                                  | 0.26                                  | ---                                       | ---                                   | ---                                 | 1.67               |
| Selenium compounds                            | ---                             | ---                         | 1.055-04                              | 1.185-05                             | 1.535-05                               | 1.055-04                              | 1.185-05                             | 1.535-05                               | 1.055-04                              | 1.185-05                             | 1.535-05                               | 1.015-06                              | 4.745-07                              | ---                                       | ---                                   | ---                                 | 3.975-04           |
| Styrene                                       | ---                             | ---                         | 0.070                                 | ---                                  | ---                                    | 0.070                                 | ---                                  | ---                                    | 0.070                                 | ---                                  | ---                                    | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 0.21               |
| Tetrachlorobenzene-p, dioxin, 2,3,7,8-        | ---                             | ---                         | 3.165-10                              | 3.610-11                             | 4.895-11                               | 3.165-10                              | 3.610-11                             | 4.895-11                               | 3.165-10                              | 3.610-11                             | 4.895-11                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 1.205-09           |
| Toluene                                       | ---                             | ---                         | 0.0019                                | ---                                  | ---                                    | 0.0019                                | ---                                  | ---                                    | 0.0019                                | ---                                  | ---                                    | 1.435-04                              | 4.725-05                              | 3.075-04                                  | 9.385-05                              | ---                                 | 0.0044             |
| Total PM (PM)                                 | ---                             | ---                         | 0.0085                                | 0.285-04                             | 0.815-04                               | 0.0085                                | 0.285-04                             | 0.815-04                               | 0.0085                                | 0.285-04                             | 0.815-04                               | 1.725-03                              | 8.065-04                              | 2.325-04                                  | 3.855-05                              | 1.785-04                            | 0.29               |
| Trichloroethane, 1,1,1-                       | ---                             | ---                         | 0.023                                 | 1.305-04                             | 1.695-04                               | 0.023                                 | 1.305-04                             | 1.695-04                               | 0.023                                 | 1.305-04                             | 1.695-04                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 0.089              |
| Trichloroethylene                             | ---                             | ---                         | 0.0011                                | 1.295-04                             | 1.645-04                               | 0.0011                                | 1.295-04                             | 1.645-04                               | 0.0011                                | 1.295-04                             | 1.645-04                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 0.0042             |
| Trichlorophenol, 2,4,6-                       | ---                             | ---                         | 8.095-07                              | 9.245-08                             | 1.205-07                               | 8.095-07                              | 9.245-08                             | 1.205-07                               | 8.095-07                              | 9.245-08                             | 1.205-07                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 3.075-06           |
| Vinyl chloride                                | ---                             | ---                         | 6.625-04                              | 7.565-05                             | 9.815-05                               | 6.625-04                              | 7.565-05                             | 9.815-05                               | 6.625-04                              | 7.565-05                             | 9.815-05                               | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 0.0025             |
| Xylene                                        | ---                             | ---                         | 8.205-06                              | ---                                  | ---                                    | 8.205-06                              | ---                                  | ---                                    | 8.205-06                              | ---                                  | ---                                    | ---                                   | ---                                   | ---                                       | ---                                   | ---                                 | 0.0030             |
| <b>Total HAP Emissions<sup>2</sup> (tpy)</b>  | <b>0.44</b>                     | <b>0.27</b>                 | <b>6.37</b>                           | <b>0.50</b>                          | <b>0.17</b>                            | <b>6.33</b>                           | <b>0.50</b>                          | <b>0.17</b>                            | <b>6.33</b>                           | <b>0.50</b>                          | <b>0.17</b>                            | <b>7.44</b>                           | <b>3.92</b>                           | <b>2.115-04</b>                           | <b>6.535-05</b>                       | <b>---</b>                          | <b>36.2</b>        |
| <b>Maximum Individual HAP</b>                 | <b>Methanol</b>                 | <b>Methanol</b>             | <b>Methanol</b>                       | <b>Acetaldehyde</b>                  | <b>Hydrochloric acid</b>               | <b>Hydrochloric acid</b>              | <b>Acetaldehyde</b>                  | <b>Hydrochloric acid</b>               | <b>Hydrochloric acid</b>              | <b>Acetaldehyde</b>                  | <b>Hydrochloric acid</b>               | <b>Methanol</b>                       | <b>Methanol</b>                       | <b>Benzene</b>                            | <b>Formaldehyde</b>                   | <b>Formaldehyde</b>                 | <b>Methanol</b>    |
| <b>Maximum Individual HAP Emissions (tpy)</b> | <b>0.44</b>                     | <b>0.27</b>                 | <b>2.41</b>                           | <b>0.10</b>                          | <b>0.10</b>                            | <b>1.40</b>                           | <b>0.10</b>                          | <b>0.10</b>                            | <b>1.40</b>                           | <b>0.10</b>                          | <b>0.10</b>                            | <b>4.37</b>                           | <b>2.18</b>                           | <b>8.485-04</b>                           | <b>2.715-04</b>                       | <b>0.0066</b>                       | <b>11.3</b>        |

Notes:  
1. Includes emissions at outlet of the RTO stack as well as emissions resulting from combustion of propane or natural gas by the RTO burners. Emissions from the Green HAP burners will be routed through the Dryer Line 1 MSF and RTO. If Dryer Line 1 is not operational, the Green HAP burner exhaust will be routed to the WESP/STO on Dryer Line 3. For purposes of potential emissions, emissions from the Green HAP burners are shown under Dryer Line 1 only to avoid double counting.  
2. Includes emissions at outlet of the RCO-1 (AA-016) stack as well as emissions resulting from combustion of propane or natural gas by the RCO-1 burners. RCO-1 will control emissions from Dicyclohexyl (DC) pellet mills, and eight (8) pellet coolers.  
3. Includes emissions at outlet of the RCO-2 (AA-017) stack as well as emissions resulting from combustion of propane or natural gas by the RCO-2 burners. RCO-2 will control emissions from Dicyclohexyl (DC) pellet mills, and four (4) pellet coolers.  
4. Because benzophenone and naphthalene emissions were presented individually and as components of total HAP emissions, the total HAP emissions presented here do not match the sum of all pollutant emissions to avoid double counting benzophenone and naphthalene emissions.

Abbreviations:  
HAP - hazardous air pollutant  
RTO - regenerative thermal oxidizer  
tpy - tons per year  
MSF - wet electrostatic precipitator  
WESP - wet electrostatic precipitator

**Table 4**  
**Potential Emissions from Debarking**  
**AA-001**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Calculation Basis**

|                                |                  |
|--------------------------------|------------------|
| Hourly Throughput <sup>1</sup> | 238 ton/hr       |
| Annual Throughput <sup>1</sup> | 2,085,714 ton/yr |

**Potential Criteria Pollutant Emissions**

| Pollutant        | Emission Factor <sup>2</sup><br>(lb/ton) | Potential Emissions |       |
|------------------|------------------------------------------|---------------------|-------|
|                  |                                          | (lb/hr)             | (tpy) |
| TSP              | 0.020                                    | 4.76                | 20.9  |
| PM <sub>10</sub> | 0.011                                    | 2.62                | 11.5  |

**Notes:**

- <sup>1</sup> Debarker throughput provided by Kai Simonsen (Enviva) via email on June 25, 2018.
- <sup>2</sup> Particulate matter emission factors from the USEPA document titled *AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants*. Source Classification Code 3-07-008-01 (Log Debarking). All PM is assumed to be larger than 2.5 microns in diameter.

**Abbreviations:**

hr - hour  
lb - pound  
ODT - oven dried tons  
tpy - tons per year  
yr - year

**Reference:**

EPA. 1990. *AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants*. Source Classification Code 3-07-008-01 (Log Debarking).

**Table 5**  
**Log Chipping Potential Emissions**  
**AA-002**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Calculation Basis**

|                                |                 |
|--------------------------------|-----------------|
| Hourly Throughput <sup>1</sup> | 200 ton/hr, wet |
|                                | 100 ODT/hr      |
| Annual Throughput              | 876,000 ODT/yr  |

**Potential Criteria Pollutant Emissions**

| Pollutant      | Emission Factor <sup>2</sup> | Potential Emissions |       |
|----------------|------------------------------|---------------------|-------|
|                |                              | (lb/hr)             | (tpy) |
| VOC as propane | 5.00E-03 lb/ODT              | 0.50                | 2.19  |
| Methanol       | 1.00E-03 lb/ODT              | 0.10                | 0.44  |

**Notes:**

- <sup>1</sup> Chipper throughput provided by Kai Simonsen (Enviva) via email on June 25, 2018. The chipper is located inside of a building. As such, there are no quantifiable particulate emissions.
- <sup>2</sup> Emission factor obtained from available emissions factors for chippers in AP-42 Section 10.6.3, Medium Density Fiberboard, 08/02, Table 7 and Section 10.6.4, Hardboard and Fiberboard, 10/02, Table 9.

**Abbreviations:**

hr - hour  
lb - pound  
ODT - oven dried tons  
THC - total hydrocarbon  
tpy - tons per year  
yr - year

**References:**

EPA. AP-42, Section 10.6.3 - Medium Density Fiberboard, (08/02).  
EPA. AP-42, Section 10.6.4 - Hardboard and Fiberboard, (10/02).



**Table 6**  
**Bark Hog Potential Emissions**  
**AA-003**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Calculation Basis**

|                                       |                     |
|---------------------------------------|---------------------|
| Hourly Throughput <sup>1</sup>        | 113 ton/hr, wet     |
|                                       | 62 ODT/hr           |
| Annual Throughput                     | 544,893 ODT/yr      |
|                                       | 990,714 ton/yr, wet |
| Approx. Moisture Content <sup>1</sup> | 45% of total weight |

**Potential Criteria Pollutant Emissions**

| Pollutant                     | Emission Factor | Potential Emissions |       |
|-------------------------------|-----------------|---------------------|-------|
|                               |                 | (lb/hr)             | (tpy) |
| VOC as propane <sup>2,3</sup> | 5.00E-03 lb/ODT | 0.31                | 1.36  |
| Methanol <sup>2</sup>         | 1.00E-03 lb/ODT | 0.062               | 0.27  |
| TSP <sup>3</sup>              | 2.00E-02 lb/ton | 2.26                | 9.91  |
| PM <sub>10</sub> <sup>3</sup> | 1.10E-02 lb/ton | 1.24                | 5.45  |

**Notes:**

- <sup>1</sup> Bark hog throughput and approximate moisture content provided by Kai Simonsen (Enviva) via email on June 25, 2018.
- <sup>2</sup> Emission factor obtained from available emissions factors for chippers in AP-42 Section 10.6.3, Medium Density Fiberboard, 08/02, Table 7 and Section 10.6.4, Hardboard and Fiberboard, 10/02, Table 9.
- <sup>3</sup> Particulate matter emission factors from the USEPA document titled *AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants. Source Classification Code 3-07-008-01 (Log Debarking)*. All PM is assumed to be larger than 2.5 microns.

**Abbreviations:**

hr - hour  
lb - pound  
ODT - oven dried tons  
THC - total hydrocarbon  
tpy - tons per year  
yr - year

**References:**

EPA. AP-42, Section 10.6.3 - Medium Density Fiberboard, (08/02).  
EPA. AP-42, Section 10.6.4 - Hardboard and Fiberboard, (10/02).  
EPA. 1990. AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants. Source Classification Code 3-07-008-01 (Log Debarking).

**Table 7**  
**Green Wood, Bark, and Dry Shavings Material Handling**  
**AA-004, AA-021, and Bark Handling IA**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

| Emission Point ID                      | Source Description            | Transfer Activity                 | Number of Drop Points | Material Moisture Content <sup>1</sup> | PM Emission Factor <sup>2</sup> | PM <sub>10</sub> Emission Factor <sup>2</sup> | PM <sub>2.5</sub> Emission Factor <sup>2</sup> | Potential Throughput |           | Potential PM Emissions |       | Potential PM <sub>10</sub> Emissions |        | Potential PM <sub>2.5</sub> Emissions |        |
|----------------------------------------|-------------------------------|-----------------------------------|-----------------------|----------------------------------------|---------------------------------|-----------------------------------------------|------------------------------------------------|----------------------|-----------|------------------------|-------|--------------------------------------|--------|---------------------------------------|--------|
|                                        |                               |                                   |                       | (%)                                    | (lb/ton)                        | (lb/ton)                                      | (lb/ton)                                       | (tph)                | (tpy)     | (lb/hr)                | (tpy) | (lb/hr)                              | (tpy)  | (lb/hr)                               | (tpy)  |
| AA-004                                 | Greenwood Handling Operations | Chips to Pile via Conveyor        | 1                     | 50%                                    | 4.06E-05                        | 1.92E-05                                      | 2.91E-06                                       | 620                  | 5,431,200 | 0.025                  | 0.11  | 0.012                                | 0.052  | 0.0018                                | 0.0079 |
|                                        |                               | Chip Truck Dump to Hoppers        | 3                     | 50%                                    | 4.06E-05                        | 1.92E-05                                      | 2.91E-06                                       | 140                  | 1,226,400 | 0.017                  | 0.075 | 0.0081                               | 0.035  | 0.0012                                | 0.0054 |
| Total Green Wood Handling Emissions:   |                               |                                   |                       |                                        |                                 |                                               |                                                |                      |           | 0.042                  | 0.19  | 0.020                                | 0.088  | 0.0030                                | 0.013  |
| IA <sup>3</sup>                        | Bark Handling Operations      | Bark Truck Dump to Hopper         | 1                     | 45%                                    | 4.71E-05                        | 2.23E-05                                      | 3.37E-06                                       | 75                   | 657,000   | 0.0035                 | 0.015 | 0.0017                               | 0.0073 | 0.00025                               | 0.0011 |
|                                        |                               | Bark to Pile via Conveyor         | 1                     | 45%                                    | 4.71E-05                        | 2.23E-05                                      | 3.37E-06                                       | 113                  | 990,714   | 0.0053                 | 0.023 | 0.0025                               | 0.011  | 0.00038                               | 0.0017 |
| Total Bark Handling Emissions:         |                               |                                   |                       |                                        |                                 |                                               |                                                |                      |           | 0.0089                 | 0.039 | 0.0042                               | 0.018  | 6.34E-04                              | 0.0028 |
| AA-021                                 | Dry Shavings Handling         | Dry Shavings Truck Dump to Hopper | 1                     | 8%                                     | 5.29E-04                        | 2.50E-04                                      | 3.79E-05                                       | 72                   | 630,720   | 0.038                  | 0.17  | 0.018                                | 0.079  | 0.0027                                | 0.012  |
| Total Dry Shavings Handling Emissions: |                               |                                   |                       |                                        |                                 |                                               |                                                |                      |           | 0.038                  | 0.17  | 0.018                                | 0.079  | 0.0027                                | 0.012  |

**Notes:**

<sup>1</sup> Moisture content provided by Enviva.

<sup>2</sup> Emission factor calculation based on formula from AP-42, Section 13.2.4 - Aggregate Handling and Storage Piles, Equation 13.2.1, (11/06)

where:

E = emission factor (lb/ton)

k = particle size multiplier (dimensionless) for PM<sub>10</sub> 0.74

k = particle size multiplier (dimensionless) for PM<sub>2.5</sub> 0.35

k = particle size multiplier (dimensionless) for PM<sub>2.5</sub> 0.053

U = mean wind speed (mph)

7.02 Average wind speed from the Mobile/Bates Field NWS station (KMOB) for 2013-2017

<sup>3</sup> Bark storage and handling are considered an insignificant activity per 11 Miss. Admin. Code Pt. 2 Ch. 1 R. 6.7.B(13).

**Abbreviations:**

hr - hour

IA - Insignificant Activity

lb - pound

PM - particulate matter

PM<sub>10</sub> - particulate matter with an aerodynamic diameter less than 10 microns

PM<sub>2.5</sub> - particulate matter with an aerodynamic diameter of 2.5 microns or less

tpy - tons per year

yr - year

**References:**

EPA. AP-42, Section 13.2.4 - Aggregate Handling and Storage Piles, (11/06).



**Table 8**  
**Green Screen**  
**AA-005**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Calculation Basis**

|                   |                  |
|-------------------|------------------|
| Hourly Throughput | 159 ODT/hr       |
| Annual Throughput | 1,390,475 ODT/yr |

**Potential Criteria Pollutant Emissions**

| Pollutant                              | Emission Factor | Potential Emissions <sup>1</sup> |       |
|----------------------------------------|-----------------|----------------------------------|-------|
|                                        |                 | (lb/hr)                          | (tpy) |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.0038 lb/ODT   | 0.60                             | 2.64  |

**Notes:**

- <sup>1</sup>. Emission factor from NCASI Technical Bulletin No. 1020 Table 9.1 for chip screening converted from units of bone dry tons (BDT) to ODT based on a moisture content of 50%.

**Abbreviations:**

hr - hour  
lb - pound  
ODT - oven dried tons  
THC - total hydrocarbon  
tpy - tons per year  
yr - year

**References:**

National Council for Air and Stream Improvement, Inc. (NCASI). 2013. *Compilation of criteria air pollutant emissions data for sources at pulp and paper mills including boilers – an update to Technical Bulletin No. 884*. Technical Bulletin No. 1020. Research Triangle Park, NC: National Council for Air and Stream Improvement, Inc.

**Table 9  
Storage Pile Wind Erosion  
AA-006 and Bark Storage 1A  
Enviva Pellets Lucedale, LLC  
Lucedale, George County, Mississippi**

| Source                  | Description             | PM Emission Factor <sup>1</sup> |                          | VOC Emission Factor <sup>2</sup> |                          | Pile Diameter | Pile Height | Exposed Surface Area of Pile <sup>3</sup> | Potential PM Emissions |             | Potential PM <sub>10</sub> Emissions |             | Potential PM <sub>2.5</sub> Emissions |             | Potential VOC Emissions as propane <sup>4</sup> |             |
|-------------------------|-------------------------|---------------------------------|--------------------------|----------------------------------|--------------------------|---------------|-------------|-------------------------------------------|------------------------|-------------|--------------------------------------|-------------|---------------------------------------|-------------|-------------------------------------------------|-------------|
|                         |                         | (lb/day/acre)                   | (lb/hr/ft <sup>2</sup> ) | (lb/day/acre)                    | (lb/hr/ft <sup>2</sup> ) | (ft)          | (ft)        | (ft <sup>2</sup> )                        | (lb/hr)                | (tpy)       | (lb/hr)                              | (tpy)       | (lb/hr)                               | (tpy)       | (lb/hr)                                         | (tpy)       |
| AA-006                  | Green Wood Storage Pile | 9.70                            | 9.3E-06                  | 3.60                             | 3.4E-06                  | 334           | 72          | 95,412                                    | 0.88                   | 3.88        | 0.44                                 | 1.94        | 0.066                                 | 0.29        | 0.40                                            | 1.76        |
| 1A <sup>5</sup>         | Bark Storage Pile       | 9.70                            | 9.3E-06                  | 3.60                             | 3.4E-06                  | 228           | 50          | 44,583                                    | 0.41                   | 1.81        | 0.21                                 | 0.91        | 0.031                                 | 0.14        | 0.19                                            | 0.82        |
| <b>Total Emissions:</b> |                         |                                 |                          |                                  |                          |               |             |                                           | <b>1.30</b>            | <b>5.69</b> | <b>0.65</b>                          | <b>2.84</b> | <b>0.097</b>                          | <b>0.43</b> | <b>0.59</b>                                     | <b>2.58</b> |

**Notes:**

<sup>1</sup> PM emission factor based on U.S. EPA Control of Open Fugitive Dust Sources, Research Triangle Park, North Carolina, EPA-450/3-B8-008, September 1988, Page 4-17.

$$E = 1.7 \left( \frac{s}{1.3} \right)^{0.8} \left( \frac{16.5 - p}{23.5} \right)^{0.1} \left( \frac{1}{1.5} \right) \text{ lb./day/acre}$$

where: s - silt content of wood chips (%) 8.4 s - silt content (%) for lumber sawmills (mean) from AP-42, Section 13.2.2 - Unpaved Roads, 11/06, Table 13.2.2-1  
p - number of days with rainfall greater than 0.01 inch 110 Based on AP-42, Section 13.2.2 - Unpaved Roads, 11/06, Figure 13.2.2-2  
f - time that wind exceeds 5.36 m/s - 12 mph (%) 14.3 Based on meteorological data for 2013-2017 from the Mobley/Bates Field NWS station (KNOR)  
PM<sub>10</sub>/TSP ratio: 50% PM<sub>10</sub> is assumed to equal 50% of TSP based on U.S. EPA Control of Open Fugitive Dust Sources, Research Triangle Park, North Carolina, EPA-450/3-B8-008, September 1988.  
PM<sub>2.5</sub>/TSP ratio: 7.5% PM<sub>2.5</sub> is assumed to equal 7.5 % of TSP U.S. EPA Background Document for Revisions to Fine Fraction Ratios Used for AP-42 Fugitive Dust Emission Factors, November 2006.

<sup>2</sup> VOC emission factor obtained from NCASI document provided by the South Carolina Department of Health and Environmental Control (DHEC) for the calculation of fugitive VOC emissions from Douglas Fir wood storage piles. Emission factors ranged from 1.6 to 3.6 lb C/acre-day. The maximum emission factor has conservatively been selected.

<sup>3</sup> The exposed surface area of the pile is conservatively calculated as the lateral surface area of a cone  $(\pi r^2 + (\pi^2 + r^2)^{0.5})$ .

<sup>4</sup> Emission factor converted from as carbon to as propane by multiplying by 1.22.

<sup>5</sup> Bark storage and handling are considered an insignificant activity per 11 Miss. Admin. Code Pt. 2 Ch. 1 R. 6.7.0(13).

**Abbreviations:**

EPA - Environmental Protection Agency  
ft - feet  
ft<sup>2</sup> - square feet  
IA - Insignificant Activity  
lb - pound  
mgm<sup>3</sup> - miles per hour  
NCASI - National Council for Air and Stream Improvement, Inc.  
NWS - National Weather Service

PM - particulate matter  
PM<sub>10</sub> - particulate matter with an aerodynamic diameter of less than 10 microns  
PM<sub>2.5</sub> - particulate matter with an aerodynamic diameter of 2.5 microns or less  
tpy - tons per year  
TSP - Total Suspended Particulate  
yr - year  
VOC - volatile organic compound

**References:**

AP-42, Section 13.2.2 - Unpaved Roads, 11/06  
U.S. EPA Control of Open Fugitive Dust Sources, Research Triangle Park, North Carolina, EPA-450/3-B8-008, September 1988.  
U.S. EPA Background Document for Revisions to Fine Fraction Ratios Used for AP-42 Fugitive Dust Emission Factors, November 2006.

**Table 10a**  
**Potential Emissions at Outlet of Dryer Line 1 RTO Stack**  
**AA-007**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Calculation Basis**

|                                                         |                             |
|---------------------------------------------------------|-----------------------------|
| Hourly Throughput (per Dyer line)                       | 42 ODT/hr                   |
| Annual Throughput (per Dryer line)                      | 367,920 ODT/yr              |
| Hourly Heat Input Capacity (per furnace)                | 168 MMBtu/hr                |
| Annual Heat Input Capacity (per furnace)                | 1,471,680 MMBtu/yr          |
| Hourly Throughput (Total GHM) <sup>1</sup>              | 159 ODT/hr                  |
| Annual Throughput (Total GHM) <sup>1</sup>              | 1,390,475 ODT/yr            |
| Hours of Operation                                      | 8,760 hr/yr                 |
| Number of RTO Burners (per RTO)                         | 2 burners                   |
| RTO Burner Rating                                       | 8 MMBtu/hr                  |
| Dryer Double Duct System - Num. of Burners <sup>2</sup> | 2 burners                   |
| Double Duct System Burner Rating <sup>2</sup>           | 1 MMBtu/hr                  |
| Propane Heating Value <sup>3</sup>                      | 91.5 MMBtu/Mgal             |
| Natural Gas Heating Value <sup>4</sup>                  | 1,020 Btu/scf               |
| Hourly Fuel Consumption (total) <sup>5</sup>            | 0.022 Mgal/hr propane       |
|                                                         | 0.0020 MMscf/hr natural gas |
| RTO Control Efficiency <sup>6</sup>                     | 95%                         |

**Potential Criteria Pollutant and Greenhouse Gas Emissions - Dryer and Green Hammermills**

| Pollutant                                                       | Controlled Emission Factor | Units                  | Potential Emissions from Dryer and Green Hammermills <sup>7</sup> |         |
|-----------------------------------------------------------------|----------------------------|------------------------|-------------------------------------------------------------------|---------|
|                                                                 |                            |                        | (lb/hr)                                                           | (tpy)   |
| CO                                                              | 14.2                       | lb/hr <sup>8</sup>     | 14.2                                                              | 62.2    |
| NO <sub>x</sub>                                                 | 17.0                       | lb/hr <sup>9</sup>     | 17.0                                                              | 74.5    |
| SO <sub>2</sub>                                                 | 0.025                      | lb/MMBtu <sup>10</sup> | 4.20                                                              | 18.4    |
| VOC as Propane                                                  | 11.4                       | lb/hr <sup>8</sup>     | 11.4                                                              | 50.1    |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> (Filterable)             | 4.69                       | lb/hr <sup>11</sup>    | 4.69                                                              | 20.5    |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> (Condensable)            | 0.017                      | lb/MMBtu <sup>12</sup> | 2.86                                                              | 12.5    |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> (Condensable - Nat. Gas) | 0.00056                    | lb/MMBtu <sup>13</sup> | 0.0089                                                            | 0.039   |
| CO <sub>2</sub>                                                 | 780                        | lb/ODT <sup>14</sup>   | 32,760                                                            | 143,489 |

**Notes:**

- <sup>1</sup> Emissions from the Green Hammermills will be routed through the Dryer Line 1 WESP and RTO. If Dryer Line 1 is not operational, the Green Hammermill exhaust will be routed to the WESP/RTO on Dryer Line 2. For purposes of potential emissions, emissions from the Green Hammermills are shown under Dryer Line 1 (AA-007) only to avoid double-counting emissions.
- <sup>2</sup> Each dryer system will include two (2) ducts (i.e., double ducts) that will each be heated by a 1 MMBtu/hr burner. There will be a total of six (6) burners, two (2) per dryer line. The burners will fire natural gas, with propane as a back-up, and will be low-NO<sub>x</sub> burners.
- <sup>3</sup> Propane heat content from AP-42 Section 1.5 - Liquefied Petroleum Gas Production, 7/08.
- <sup>4</sup> Natural gas heating value from AP-42 Section 1.4 - Natural Gas Combustion, 07/98.
- <sup>5</sup> Total hourly fuel consumption for both burners. The burners will fire natural gas, with propane as a back-up.
- <sup>6</sup> Control efficiency based on RTO vendor guarantee.
- <sup>7</sup> Exhaust from the dryers are routed to a WESP and then RTO for control of VOC, HAP, and particulates. Each of the three (3) dryer lines will have a dedicated WESP and RTO.
- <sup>8</sup> CO and VOC emission rates based on vendor data and stack testing at similar Enviva plants.
- <sup>9</sup> NO<sub>x</sub> emission factor based on stack testing at similar Enviva plants.
- <sup>10</sup> No emission factor is provided in AP-42, Section 10.6.2 for SO<sub>2</sub> for rotary dryers. Enviva has conservatively calculated SO<sub>2</sub> emissions based on AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03.
- <sup>11</sup> Filterable particulate emission rate based on RTO vendor data.
- <sup>12</sup> Condensable particulate emission factor for biomass combustion obtained from AP-42 Section 1.6.
- <sup>13</sup> Natural gas combustion by the RTO burners will also result in emissions of condensable PM. Emission factor obtained from AP-42, Section 1.4 - Natural Gas Combustion, 07/98.
- <sup>14</sup> Emission factor for CO<sub>2</sub> from AP-42, Section 10.6.1 for rotary dryer with RTO control device. Enviva has conservatively calculated the CO<sub>2</sub> emissions using the hardwood emission factor because the dryers at the Lucedale plant will use a combination of hardwood and softwood and the hardwood emission factor is greater than the softwood emission factor.



**Table 10a**  
**Potential Emissions at Outlet of Dryer Line 1 RTO Stack**  
**AA-007**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Potential Criteria Pollutant and Greenhouse Gas Emissions - Dryer System Double Duct Burners<sup>1</sup>**

| Pollutant                                          | Natural Gas Emission Factor <sup>2,3</sup><br>(lb/MMscf) | Potential Emissions - Natural Gas Combustion |          | Propane Emission Factor <sup>4,5,6</sup><br>(lb/Mgal) | Potential Emissions - Propane Combustion |        |
|----------------------------------------------------|----------------------------------------------------------|----------------------------------------------|----------|-------------------------------------------------------|------------------------------------------|--------|
|                                                    |                                                          | (lb/hr)                                      | (tpy)    |                                                       | (lb/hr)                                  | (tpy)  |
| CO                                                 | 84.0                                                     | 0.16                                         | 0.72     | 7.50                                                  | 0.16                                     | 0.72   |
| NO <sub>x</sub>                                    | 50.0                                                     | 0.10                                         | 0.43     | 6.50                                                  | 0.14                                     | 0.62   |
| SO <sub>2</sub>                                    | 0.60                                                     | 0.0012                                       | 0.0052   | 0.054                                                 | 0.0012                                   | 0.0052 |
| VOC                                                | 5.50                                                     | 5.39E-04                                     | 0.0024   | 1.00                                                  | 0.0011                                   | 0.0048 |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> Condensable | 5.70                                                     | 5.59E-04                                     | 0.0024   | 0.50                                                  | 5.46E-04                                 | 0.0024 |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> Filterable  | 1.90                                                     | 1.86E-04                                     | 8.16E-04 | 0.20                                                  | 2.19E-04                                 | 0.0010 |
| Total PM/PM <sub>10</sub> /PM <sub>2.5</sub>       | --                                                       | 7.45E-04                                     | 0.0033   | --                                                    | 7.65E-04                                 | 0.0034 |
| CO <sub>2</sub>                                    | 120,000                                                  | 235                                          | 1,031    | 12,500                                                | 273                                      | 1,197  |
| CH <sub>4</sub>                                    | 2.30                                                     | 0.0045                                       | 0.020    | 0.20                                                  | 0.0044                                   | 0.019  |
| N <sub>2</sub> O <sup>2</sup>                      | 0.64                                                     | 0.0013                                       | 0.0055   | 0.90                                                  | 0.020                                    | 0.0862 |
| CO <sub>2</sub> e                                  | --                                                       | 236                                          | 1,033    | --                                                    | 279                                      | 1,223  |

**Notes:**

- <sup>1</sup> Two (2) low-NO<sub>x</sub> burners will be used to heat the dryer system ducts to prevent condensation of wood tar from occurring and thus reduce the fire risk. The burners will combust natural gas. Emissions from the burners will be routed to the WESP and RTO on each dryer line; therefore, a 95% control efficiency was applied to VOC and PM/PM<sub>10</sub>/PM<sub>2.5</sub>.
- <sup>2</sup> Emission factors for natural gas combustion from AP-42 Section 1.4 - Natural Gas Combustion, 07/98. Natural gas heating value of 1,020 Btu/scf assumed per AP-42.
- <sup>3</sup> Emission factors for NO<sub>x</sub> and N<sub>2</sub>O assume burners are low NO<sub>x</sub> burners, per email from Kai Simonsen (Enviva) on August 8, 2018.
- <sup>4</sup> Emission factors for propane combustion obtained from AP-42 Section 1.5 - Liquefied Petroleum Gas Combustion, 07/08.
- <sup>5</sup> AP-42 Section 1.5 does not include an emission factor for low NO<sub>x</sub> burners. Per AP-42 Section 1.4, low NO<sub>x</sub> burners reduce NO<sub>x</sub> emissions by accomplishing combustion in stages, reducing NO<sub>x</sub> emissions 40 to 85% relative to uncontrolled emission levels. A conservative control efficiency of 50% was applied to the uncontrolled NO<sub>x</sub> emission factor from AP-42 Section 1.5. This reduction is consistent with the magnitude of reduction between the uncontrolled and low NO<sub>x</sub> emission factors in AP-42 Section 1.4.
- <sup>6</sup> SO<sub>2</sub> emissions are based on an assumed fuel sulfur content of 0.54 grains/100 ft<sup>3</sup> per A National Methodology and Emission Inventory for Residential Fuel Combustion.

**Table 10a**  
**Potential Emissions at Outlet of Dryer Line 1 RTO Stack**  
**AA-007**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Potential HAP Emissions**

| Pollutant                                | VOC | Emission Factor | Units    | Footnote | Potential Emissions |          |
|------------------------------------------|-----|-----------------|----------|----------|---------------------|----------|
|                                          |     |                 |          |          | (lb/hr)             | (tpy)    |
| Furnace - Biomass Combustion             |     |                 |          |          |                     |          |
| Acetaldehyde                             | Y   | 4.88E-03        | lb/ODT   | 1        | 0.20                | 0.90     |
| Acrolein                                 | Y   | 2.43E-03        | lb/ODT   | 1        | 0.10                | 0.45     |
| Formaldehyde                             | Y   | 2.84E-03        | lb/ODT   | 1        | 0.12                | 0.52     |
| Methanol                                 | Y   | 4.24E-03        | lb/ODT   | 1        | 0.18                | 0.78     |
| Phenol                                   | Y   | 3.84E-03        | lb/ODT   | 1        | 0.16                | 0.71     |
| Propionaldehyde                          | Y   | 1.39E-03        | lb/ODT   | 1        | 0.058               | 0.26     |
| Acetophenone                             | Y   | 3.20E-09        | lb/MMBtu | 1        | 2.69E-08            | 1.18E-07 |
| Antimony and compounds                   | N   | 7.90E-06        | lb/MMBtu | 2,4      | 6.64E-05            | 2.91E-04 |
| Arsenic and compounds                    | N   | 2.20E-05        | lb/MMBtu | 2,4      | 1.85E-04            | 8.09E-04 |
| Benzene                                  | Y   | 4.20E-03        | lb/MMBtu | 2,3      | 0.035               | 0.15     |
| Benzo(a)pyrene                           | Y   | 2.60E-06        | lb/MMBtu | 2,3      | 2.18E-05            | 9.57E-05 |
| Beryllium metal                          | N   | 1.10E-06        | lb/MMBtu | 2,4      | 9.24E-06            | 4.05E-05 |
| Cadmium metal                            | N   | 4.10E-06        | lb/MMBtu | 2,4      | 3.44E-05            | 1.51E-04 |
| Carbon tetrachloride                     | Y   | 4.50E-05        | lb/MMBtu | 2,3      | 3.78E-04            | 1.66E-03 |
| Chlorine                                 | N   | 7.90E-04        | lb/MMBtu | 2        | 0.13                | 0.58     |
| Chlorobenzene                            | Y   | 3.30E-05        | lb/MMBtu | 2,3      | 2.77E-04            | 1.21E-03 |
| Chloroform                               | Y   | 2.80E-05        | lb/MMBtu | 2,3      | 2.35E-04            | 1.03E-03 |
| Chromium-Other compounds                 | N   | 1.75E-05        | lb/MMBtu | 2,4      | 1.47E-04            | 6.44E-04 |
| Cobalt compounds                         | N   | 6.50E-06        | lb/MMBtu | 2,4      | 5.46E-05            | 2.39E-04 |
| Dichloroethane, 1,2-                     | Y   | 2.90E-05        | lb/MMBtu | 2,3      | 2.44E-04            | 1.07E-03 |
| Dichloropropane, 1,2-                    | Y   | 3.30E-05        | lb/MMBtu | 2,3      | 2.77E-04            | 1.21E-03 |
| Dinitrophenol, 2,4-                      | Y   | 1.80E-07        | lb/MMBtu | 2,3      | 1.51E-06            | 6.62E-06 |
| Di(2-ethylhexyl)phthalate                | Y   | 4.70E-08        | lb/MMBtu | 2,3      | 3.95E-07            | 1.73E-06 |
| Ethyl benzene                            | Y   | 3.10E-05        | lb/MMBtu | 2,3      | 2.60E-04            | 1.14E-03 |
| Hydrochloric acid                        | N   | 1.90E-02        | lb/MMBtu | 2,5      | 0.32                | 1.40     |
| Lead and lead compounds                  | N   | 4.80E-05        | lb/MMBtu | 2,4      | 4.03E-04            | 0.0018   |
| Manganese and compounds                  | N   | 1.60E-03        | lb/MMBtu | 2,4      | 0.013               | 0.059    |
| Mercury                                  | N   | 3.50E-06        | lb/MMBtu | 2,4      | 2.94E-05            | 1.29E-04 |
| Methyl bromide                           | Y   | 1.50E-05        | lb/MMBtu | 2,3      | 1.26E-04            | 5.52E-04 |
| Methyl chloride                          | Y   | 2.30E-05        | lb/MMBtu | 2,3      | 1.93E-04            | 8.46E-04 |
| Methylene chloride                       | Y   | 2.90E-04        | lb/MMBtu | 2,3      | 0.0024              | 0.011    |
| Naphthalene                              | Y   | 9.70E-05        | lb/MMBtu | 2,3      | 8.15E-04            | 0.0036   |
| Nickel metal                             | N   | 3.30E-05        | lb/MMBtu | 2,4      | 2.77E-04            | 0.0012   |
| Nitrophenol, 4-                          | Y   | 1.10E-07        | lb/MMBtu | 2,3      | 9.24E-07            | 4.05E-06 |
| Pentachlorophenol                        | N   | 5.10E-08        | lb/MMBtu | 2        | 8.57E-06            | 3.75E-05 |
| Perchloroethylene                        | N   | 3.80E-05        | lb/MMBtu | 2        | 0.0064              | 0.028    |
| Phosphorus metal, yellow or white        | N   | 2.70E-05        | lb/MMBtu | 2,4      | 2.27E-04            | 9.93E-04 |
| Polychlorinated biphenyls                | Y   | 8.15E-09        | lb/MMBtu | 2,3      | 6.85E-08            | 3.00E-07 |
| Polycyclic Organic Matter                | N   | 1.25E-04        | lb/MMBtu | 2        | 0.021               | 0.092    |
| Selenium compounds                       | N   | 2.80E-06        | lb/MMBtu | 2,4      | 2.35E-05            | 1.03E-04 |
| Styrene                                  | Y   | 1.90E-03        | lb/MMBtu | 2,3      | 0.016               | 0.070    |
| Tetrachlorodibenzo-p-dioxin, 2,3,7,8-    | Y   | 8.60E-12        | lb/MMBtu | 2,3      | 7.22E-11            | 3.16E-10 |
| Toluene                                  | Y   | 3.00E-05        | lb/MMBtu | 2,3      | 2.52E-04            | 0.0011   |
| Trichloroethane, 1,1,1-                  | N   | 3.10E-05        | lb/MMBtu | 2        | 0.0052              | 0.023    |
| Trichloroethylene                        | Y   | 3.00E-05        | lb/MMBtu | 2,3      | 2.52E-04            | 0.0011   |
| Trichlorophenol, 2,4,6-                  | Y   | 2.20E-08        | lb/MMBtu | 2,3      | 1.85E-07            | 8.09E-07 |
| Vinyl chloride                           | Y   | 1.80E-05        | lb/MMBtu | 2,3      | 1.51E-04            | 6.62E-04 |
| Xylene                                   | Y   | 2.50E-05        | lb/MMBtu | 2,3      | 2.10E-04            | 9.20E-04 |
| Total HAP Emissions (biomass combustion) |     |                 |          |          | 1.38                | 6.05     |



**Table 10a**  
**Potential Emissions at Outlet of Dryer Line 1 RTO Stack**  
**AA-007**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

| Pollutant                               | VOC | Emission Factor <sup>1</sup> | Units  | Potential Emissions |       |
|-----------------------------------------|-----|------------------------------|--------|---------------------|-------|
|                                         |     |                              |        | (lb/hr)             | (tpy) |
| Green Hammermills <sup>6</sup>          |     |                              |        |                     |       |
| Acetaldehyde                            | Y   | 8.40E-04                     | lb/ODT | 0.13                | 0.58  |
| Acrolein                                | Y   | 7.80E-04                     | lb/ODT | 0.12                | 0.54  |
| Formaldehyde                            | Y   | 1.20E-04                     | lb/ODT | 0.019               | 0.083 |
| Methanol                                | Y   | 2.34E-03                     | lb/ODT | 0.37                | 1.63  |
| Phenol                                  | Y   | 2.40E-04                     | lb/ODT | 0.038               | 0.17  |
| Propionaldehyde                         | Y   | 6.00E-05                     | lb/ODT | 0.0095              | 0.042 |
| Total HAP Emissions (Green Hammermills) |     |                              |        | 0.70                | 3.05  |

**Potential HAP Emissions - RTO Burners and Dryer System Double Duct Burners**

| Pollutant                                                 | VOC | Emission Factor <sup>7</sup> | Units    | RTO Burners Potential Emissions |          | Double Duct Burners Potential Emissions <sup>3,4</sup> |          |
|-----------------------------------------------------------|-----|------------------------------|----------|---------------------------------|----------|--------------------------------------------------------|----------|
|                                                           |     |                              |          | (lb/hr)                         | (tpy)    | (lb/hr)                                                | (tpy)    |
| Natural Gas Combustion                                    |     |                              |          |                                 |          |                                                        |          |
| 2-Methylnaphthalene                                       | Y   | 2.40E-05                     | lb/MMscf | 3.76E-07                        | 1.65E-06 | 2.35E-09                                               | 1.03E-08 |
| 3-Methylchloranthrene                                     | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| 7,12-Dimethylbenz(a)anthracene                            | Y   | 1.60E-05                     | lb/MMscf | 2.51E-07                        | 1.10E-06 | 1.57E-09                                               | 6.87E-09 |
| Acenaphthene                                              | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| Acenaphthylene                                            | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| Anthracene                                                | Y   | 2.40E-06                     | lb/MMscf | 3.76E-08                        | 1.65E-07 | 2.35E-10                                               | 1.03E-09 |
| Arsenic and compounds                                     | N   | 2.00E-04                     | lb/MMscf | 3.14E-06                        | 1.37E-05 | 1.96E-08                                               | 8.59E-08 |
| Benz(a)anthracene                                         | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| Benzene                                                   | Y   | 2.10E-03                     | lb/MMscf | 3.29E-05                        | 1.44E-04 | 2.06E-07                                               | 9.02E-07 |
| Benzo(a)pyrene                                            | Y   | 1.20E-06                     | lb/MMscf | 1.88E-08                        | 8.24E-08 | 1.18E-10                                               | 5.15E-10 |
| Benzo(b)fluoranthene                                      | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| Benzo(g,h,i)perylene                                      | Y   | 1.20E-06                     | lb/MMscf | 1.88E-08                        | 8.24E-08 | 1.18E-10                                               | 5.15E-10 |
| Benzo(k)fluoranthene                                      | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| Beryllium metal                                           | N   | 1.20E-05                     | lb/MMscf | 1.88E-07                        | 8.24E-07 | 1.18E-09                                               | 5.15E-09 |
| Cadmium metal                                             | N   | 1.10E-03                     | lb/MMscf | 1.73E-05                        | 7.56E-05 | 1.08E-07                                               | 4.72E-07 |
| Chromium VI                                               | N   | 1.40E-03                     | lb/MMscf | 2.20E-05                        | 9.62E-05 | 1.37E-07                                               | 6.01E-07 |
| Chrysene                                                  | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| Cobalt compounds                                          | N   | 8.40E-05                     | lb/MMscf | 1.32E-06                        | 5.77E-06 | 8.24E-09                                               | 3.61E-08 |
| Dibenzo(a,h)anthracene                                    | Y   | 1.20E-06                     | lb/MMscf | 1.88E-08                        | 8.24E-08 | 1.18E-10                                               | 5.15E-10 |
| Dichlorobenzene                                           | Y   | 1.20E-03                     | lb/MMscf | 1.88E-05                        | 8.24E-05 | 1.18E-07                                               | 5.15E-07 |
| Fluoranthene                                              | Y   | 3.00E-06                     | lb/MMscf | 4.71E-08                        | 2.06E-07 | 2.94E-10                                               | 1.29E-09 |
| Fluorene                                                  | Y   | 2.80E-06                     | lb/MMscf | 4.39E-08                        | 1.92E-07 | 2.75E-10                                               | 1.20E-09 |
| Formaldehyde                                              | Y   | 0.075                        | lb/MMscf | 0.0012                          | 0.0052   | 7.35E-06                                               | 3.22E-05 |
| Hexane                                                    | Y   | 1.80                         | lb/MMscf | 0.028                           | 0.12     | 1.76E-04                                               | 7.73E-04 |
| Indeno(1,2,3-cd)pyrene                                    | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| Lead and lead compounds                                   | N   | 5.00E-04                     | lb/MMscf | 7.84E-06                        | 3.44E-05 | 4.90E-08                                               | 2.15E-07 |
| Manganese and compounds                                   | N   | 3.80E-04                     | lb/MMscf | 5.96E-06                        | 2.61E-05 | 3.73E-08                                               | 1.63E-07 |
| Mercury                                                   | N   | 2.60E-04                     | lb/MMscf | 4.08E-06                        | 1.79E-05 | 2.55E-08                                               | 1.12E-07 |
| Naphthalene                                               | Y   | 6.10E-04                     | lb/MMscf | 9.57E-06                        | 4.19E-05 | 5.98E-08                                               | 2.62E-07 |
| Nickel metal                                              | N   | 2.10E-03                     | lb/MMscf | 3.29E-05                        | 1.44E-04 | 2.06E-07                                               | 9.02E-07 |
| Phenanthrene                                              | Y   | 1.70E-05                     | lb/MMscf | 2.67E-07                        | 1.17E-06 | 1.67E-09                                               | 7.30E-09 |
| Pyrene                                                    | Y   | 5.00E-06                     | lb/MMscf | 7.84E-08                        | 3.44E-07 | 4.90E-10                                               | 2.15E-09 |
| Selenium compounds                                        | N   | 2.40E-05                     | lb/MMscf | 3.76E-07                        | 1.65E-06 | 2.35E-09                                               | 1.03E-08 |
| Toluene                                                   | Y   | 3.40E-03                     | lb/MMscf | 5.33E-05                        | 2.34E-04 | 3.33E-07                                               | 1.46E-06 |
| Total HAP Emissions (Natural Gas Combustion) <sup>8</sup> |     |                              |          | 0.030                           | 0.13     | 1.85E-04                                               | 8.11E-04 |

**Table 10a**  
**Potential Emissions at Outlet of Dryer Line 1 RTO Stack**  
**AA-007**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Potential HAP Emissions - RTO Burners and Dryer System Double Duct Burners**

| Pollutant                                             | VOC | Emission Factor <sup>9</sup> | Units    | RTO Burners Potential Emissions |        | Double Duct Burners Potential Emissions <sup>3,4</sup> |          |
|-------------------------------------------------------|-----|------------------------------|----------|---------------------------------|--------|--------------------------------------------------------|----------|
|                                                       |     |                              |          | (lb/hr)                         | (tpy)  | (lb/hr)                                                | (tpy)    |
| Propane Combustion                                    |     |                              |          |                                 |        |                                                        |          |
| Benzene                                               | Y   | 7.10E-04                     | lb/MMBtu | 0.011                           | 0.050  | 7.10E-05                                               | 3.11E-05 |
| Formaldehyde                                          | Y   | 1.51E-03                     | lb/MMBtu | 0.024                           | 0.11   | 1.51E-04                                               | 6.61E-05 |
| PAHs                                                  | N   | 4.00E-05                     | lb/MMBtu | 6.40E-04                        | 0.0028 | 8.00E-05                                               | 7.01E-04 |
| Total HAP Emissions (Propane Combustion) <sup>9</sup> |     |                              |          | 0.036                           | 0.16   | 3.02E-04                                               | 7.98E-04 |

**Notes:**

- <sup>1</sup> Emission factor derived based on stack testing data from comparable Enviva facilities.
- <sup>2</sup> Emission factors for wood combustion in a stoker boiler from AP-42 Section 1.6 - Wood Residue Combustion in Boilers, 09/03.
- <sup>3</sup> A control efficiency of 95% for the RTOs is applied to all organic HAP for those emission factors that are not derived from Enviva stack test data.
- <sup>4</sup> A 95% control efficiency for the wet electrostatic precipitator (WESP) is applied to all metal HAP.
- <sup>5</sup> The WESP will employ a caustic solution in its operation in which hydrochloric acid will have high water solubility. This caustic solution will neutralize the acid and effectively control it by 90%, per conversation on October 18, 2011 with Steven A. Jaasund, P.E. of Lundberg Associates, a manufacturer of WESPs.
- <sup>6</sup> Emissions from the Green Hammermills will be routed through the Dryer Line 1 WESP and RTO. If Dryer Line 1 is not operational, the Green Hammermill exhaust will be routed to the WESP/RTO on Dryer Line 2. For purposes of potential emissions, emissions from the Green Hammermills are shown under Dryer Line 1 (AA-007) only to avoid double-counting.
- <sup>7</sup> Emission factors for natural gas combustion from AP-42 Section 1.4 - Natural Gas Combustion, 07/98. Natural gas heating value of 1,020 Btu/scf assumed per AP-42.
- <sup>8</sup> The RTO burners and burners for the dryer system double ducts will fire natural gas with propane as a back-up; however, propane is worst-case for HAP emissions.
- <sup>9</sup> Emission factors for propane combustion from the South Coast Air Quality Management District's Air Emissions Reporting Tool for external combustion equipment fired with LPG.

**Abbreviations:**

|                                              |                                                                                            |
|----------------------------------------------|--------------------------------------------------------------------------------------------|
| CAS - chemical abstract service              | N <sub>2</sub> O - nitrous oxide                                                           |
| CH <sub>4</sub> - methane                    | ODT - oven dried tons                                                                      |
| CO - carbon monoxide                         | PM - particulate matter                                                                    |
| CO <sub>2</sub> - carbon dioxide             | PM <sub>10</sub> - particulate matter with an aerodynamic diameter less than 10 microns    |
| CO <sub>2e</sub> - carbon dioxide equivalent | PM <sub>2.5</sub> - particulate matter with an aerodynamic diameter of 2.5 microns or less |
| GHM - Green Hammermill                       | RTO - regenerative thermal oxidizer                                                        |
| HAP - hazardous air pollutant                | SO <sub>2</sub> - sulfur dioxide                                                           |
| hr - hour                                    | tpy - tons per year                                                                        |
| kg - kilogram                                | VOC - volatile organic compound                                                            |
| lb - pound                                   | WESP - wet electrostatic precipitator                                                      |
| MMBtu - Million British thermal units        | yr - year                                                                                  |
| NO <sub>x</sub> - nitrogen oxides            |                                                                                            |

**References:**

AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03  
AP-42, Section 1.4 - Natural Gas Combustion, 07/98  
South Coast Air Quality Management District. AER Reporting tool. Emission factors available in the Help and Support Manual at: <http://www.aqmd.gov/home/rules-compliance/compliance/annual-emission-reporting>



**Table 10b**  
**Potential Emissions - Dryer 1 Bypass (Full Capacity)<sup>1</sup>**  
**AA-008**

Enviva Pellets Lucedale, LLC  
Lucedale, George County, Mississippi

**Calculation Basis**

|                                 |                |
|---------------------------------|----------------|
| Hourly Throughput               | 42 ODT/hr      |
| Hourly Heat Input Capacity      | 168 MMBtu/hr   |
| Annual Heat Input Capacity      | 8,400 MMBtu/yr |
| Hours of Operation <sup>1</sup> | 50 hr/yr       |

**Potential Criteria Pollutant and Greenhouse Gas Emissions - Dryer Bypass Full Capacity**

| Pollutant                                          | Controlled Emission Factor | Units                 | Potential Emissions |       |
|----------------------------------------------------|----------------------------|-----------------------|---------------------|-------|
|                                                    |                            |                       | (lb/hr)             | (tpy) |
| CO                                                 | 21.4                       | lb/hr <sup>2</sup>    | 21.4                | 0.54  |
| NO <sub>x</sub>                                    | 26.3                       | lb/hr <sup>2</sup>    | 26.3                | 0.66  |
| SO <sub>2</sub>                                    | 0.025                      | lb/MMBtu <sup>3</sup> | 4.20                | 0.11  |
| VOC                                                | 14.0                       | lb/hr <sup>2</sup>    | 14.0                | 0.35  |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> Condensable | 0.017                      | lb/MMBtu <sup>4</sup> | 2.86                | 0.071 |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> Filterable  | 0.33                       | lb/MMBtu <sup>5</sup> | 55.4                | 1.39  |
| Total PM/PM <sub>10</sub> /PM <sub>2.5</sub>       |                            |                       | 58.3                | 1.46  |
| CO <sub>2</sub>                                    | 93.8                       | kg/MMBtu <sup>6</sup> | 34,741              | 869   |
| CH <sub>4</sub>                                    | 0.0072                     | kg/MMBtu <sup>6</sup> | 2.67                | 0.067 |
| N <sub>2</sub> O                                   | 0.0036                     | kg/MMBtu <sup>6</sup> | 1.33                | 0.033 |
| CO <sub>2</sub> e                                  |                            |                       | 35,205              | 880   |

**Notes:**

- <sup>1</sup> During startup and shutdown (for temperature control) or malfunction, emissions will be vented out either the dryer bypass stacks or the furnace bypass stacks. Use of each bypass stack at full capacity will not exceed 50 hours per 12-month rolling period for each dryer line.
- <sup>2</sup> CO, NO<sub>x</sub>, and VOC emission rates based on vendor data.
- <sup>3</sup> No emission factor is provided in AP-42, Section 10.6.2 for SO<sub>2</sub> for rotary dryers. Enviva has conservatively calculated SO<sub>2</sub> emissions based on AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03.
- <sup>4</sup> Emission factor for condensable PM based on AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03.
- <sup>5</sup> Uncontrolled filterable PM emission factor is based on testing at a comparable Enviva facility.
- <sup>6</sup> Emission factors for biomass combustion (dryer) from Table C-1 and C-2 of 40 CFR Part 98 and Global Warming Potentials from Table A-1.



**Table 10b**  
**Potential Emissions - Dryer 1 Bypass (Full Capacity)<sup>1</sup>**  
**AA-008**

Enviva Pellets Lucedale, LLC  
Lucedale, George County, Mississippi

**Potential HAP Emissions - Dryer Bypass Full Capacity**

| Pollutant                             | Emission Factor | Units    | Footnote | Potential Emissions <sup>1</sup> |             |
|---------------------------------------|-----------------|----------|----------|----------------------------------|-------------|
|                                       |                 |          |          | (lb/hr)                          | (tpy)       |
| Acetaldehyde                          | 0.10            | lb/ODT   | 2        | 4.10                             | 0.10        |
| Acrolein                              | 0.049           | lb/ODT   | 2        | 2.04                             | 0.051       |
| Formaldehyde                          | 0.057           | lb/ODT   | 2        | 2.39                             | 0.060       |
| Methanol                              | 0.085           | lb/ODT   | 2        | 3.56                             | 0.089       |
| Phenol                                | 0.077           | lb/ODT   | 2        | 3.23                             | 0.081       |
| Propionaldehyde                       | 0.028           | lb/ODT   | 2        | 1.16                             | 0.029       |
| Acetophenone                          | 3.20E-09        | lb/MMBtu | 3        | 5.38E-07                         | 1.34E-08    |
| Antimony and compounds                | 7.90E-06        | lb/MMBtu | 3        | 1.33E-03                         | 3.32E-05    |
| Arsenic and compounds                 | 2.20E-05        | lb/MMBtu | 3        | 3.70E-03                         | 9.24E-05    |
| Benzo(a)pyrene                        | 2.60E-06        | lb/MMBtu | 3        | 4.37E-04                         | 1.09E-05    |
| Beryllium metal                       | 1.10E-06        | lb/MMBtu | 3        | 1.85E-04                         | 4.62E-06    |
| Cadmium metal                         | 4.10E-06        | lb/MMBtu | 3        | 6.89E-04                         | 1.72E-05    |
| Carbon tetrachloride                  | 4.50E-05        | lb/MMBtu | 3        | 7.56E-03                         | 1.89E-04    |
| Chlorine                              | 7.90E-04        | lb/MMBtu | 3        | 0.13                             | 0.0033      |
| Chlorobenzene                         | 3.30E-05        | lb/MMBtu | 3        | 5.54E-03                         | 1.39E-04    |
| Chromium-Other compounds              | 1.75E-05        | lb/MMBtu | 3        | 2.94E-03                         | 7.35E-05    |
| Cobalt compounds                      | 6.50E-06        | lb/MMBtu | 3        | 1.09E-03                         | 2.73E-05    |
| Dinitrophenol, 2,4-                   | 1.80E-07        | lb/MMBtu | 3        | 3.02E-05                         | 7.56E-07    |
| Di(2-ethylhexyl)phthalate             | 4.70E-08        | lb/MMBtu | 3        | 7.90E-06                         | 1.97E-07    |
| Ethyl benzene                         | 3.10E-05        | lb/MMBtu | 3        | 5.21E-03                         | 1.30E-04    |
| Dichloroethane, 1,2-                  | 2.90E-05        | lb/MMBtu | 3        | 4.87E-03                         | 1.22E-04    |
| Hydrochloric acid                     | 1.90E-02        | lb/MMBtu | 3        | 3.19                             | 0.080       |
| Lead and lead compounds               | 4.80E-05        | lb/MMBtu | 3        | 8.06E-03                         | 2.02E-04    |
| Manganese and compounds               | 1.60E-03        | lb/MMBtu | 3        | 0.27                             | 0.0067      |
| Mercury                               | 3.50E-06        | lb/MMBtu | 3        | 5.88E-04                         | 1.47E-05    |
| Methyl bromide                        | 1.50E-05        | lb/MMBtu | 3        | 2.52E-03                         | 6.30E-05    |
| Methyl chloride                       | 2.30E-05        | lb/MMBtu | 3        | 3.86E-03                         | 9.66E-05    |
| Trichloroethane, 1,1,1-               | 3.10E-05        | lb/MMBtu | 3        | 5.21E-03                         | 1.30E-04    |
| Naphthalene                           | 9.70E-05        | lb/MMBtu | 3        | 0.016                            | 4.07E-04    |
| Nickel metal                          | 3.30E-05        | lb/MMBtu | 3        | 5.54E-03                         | 1.39E-04    |
| Nitrophenol, 4-                       | 1.10E-07        | lb/MMBtu | 3        | 1.85E-05                         | 4.62E-07    |
| Pentachlorophenol                     | 5.10E-08        | lb/MMBtu | 3        | 8.57E-06                         | 2.14E-07    |
| Perchloroethylene                     | 3.80E-05        | lb/MMBtu | 3        | 6.38E-03                         | 1.60E-04    |
| Phosphorus metal, yellow or white     | 2.70E-05        | lb/MMBtu | 3        | 4.54E-03                         | 1.13E-04    |
| Polychlorinated biphenyls             | 8.15E-09        | lb/MMBtu | 3        | 1.37E-06                         | 3.42E-08    |
| Total PAH (POM)                       | 1.25E-04        | lb/MMBtu | 3        | 0.021                            | 5.25E-04    |
| Dichloropropane, 1,2-                 | 3.30E-05        | lb/MMBtu | 3        | 5.54E-03                         | 1.39E-04    |
| Selenium compounds                    | 2.80E-06        | lb/MMBtu | 3        | 4.70E-04                         | 1.18E-05    |
| Tetrachlorodibenzo-p-dioxin, 2,3,7,8- | 8.60E-12        | lb/MMBtu | 3        | 1.44E-09                         | 3.61E-11    |
| Trichloroethylene                     | 3.00E-05        | lb/MMBtu | 3        | 5.04E-03                         | 1.26E-04    |
| Trichlorophenol, 2,4,6-               | 2.20E-08        | lb/MMBtu | 3        | 3.70E-06                         | 9.24E-08    |
| Vinyl chloride                        | 1.80E-05        | lb/MMBtu | 3        | 3.02E-03                         | 7.56E-05    |
| <b>Total HAP Emissions</b>            |                 |          |          | <b>20.2</b>                      | <b>0.50</b> |

**Notes:**

- <sup>1</sup> During dryer bypass emissions are not controlled by the WESP and RTO; however, combustion in the furnace still results in a reduction in organic HAP emission rates.
- <sup>2</sup> Organic HAP emissions rates were derived based on stack testing data from Cottdale and other similar Enviva plants.
- <sup>3</sup> Emission factors for wood combustion in a stoker boiler from AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03.

**Table 10b**  
**Potential Emissions - Dryer 1 Bypass (Full Capacity)<sup>1</sup>**  
**AA-008**

**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Abbreviations:**

|                                               |                                                                                            |
|-----------------------------------------------|--------------------------------------------------------------------------------------------|
| CH <sub>4</sub> - methane                     | ODT - oven dried tons                                                                      |
| CO - carbon monoxide                          | PM - particulate matter                                                                    |
| CO <sub>2</sub> - carbon dioxide              | PM <sub>10</sub> - particulate matter with an aerodynamic diameter less than 10 microns    |
| CO <sub>2</sub> e - carbon dioxide equivalent | PM <sub>2.5</sub> - particulate matter with an aerodynamic diameter of 2.5 microns or less |
| HAP - hazardous air pollutant                 | RTO - regenerative thermal oxidizer                                                        |
| hr - hour                                     | SO <sub>2</sub> - sulfur dioxide                                                           |
| kg - kilogram                                 | tpy - tons per year                                                                        |
| lb - pound                                    | VOC - volatile organic compound                                                            |
| MMBtu - Million British thermal units         | WESP - wet electrostatic precipitator                                                      |
| NO <sub>x</sub> - nitrogen oxides             | yr - year                                                                                  |
| N <sub>2</sub> O - nitrous oxide              |                                                                                            |

**Reference:**

AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03

**Table 10c**  
**Potential Emissions - Furnace 1 Bypass (Full Capacity)<sup>1</sup>**

**AA-009**

Enviva Pellets Lucedale, LLC  
 Lucedale, George County, Mississippi

**Calculation Basis**

|                                 |                |
|---------------------------------|----------------|
| Hourly Throughput               | 42 ODT/hr      |
| Hourly Heat Input Capacity      | 168 MMBtu/hr   |
| Annual Heat Input Capacity      | 8,400 MMBtu/yr |
| Hours of Operation <sup>1</sup> | 50 hr/yr       |

**Potential Criteria Pollutant and Greenhouse Gas Emissions - Furnace Bypass Full Capacity**

| Pollutant                                    | Controlled Emission Factor | Units                 | Potential Emissions |       |
|----------------------------------------------|----------------------------|-----------------------|---------------------|-------|
|                                              |                            |                       | (lb/hr)             | (tpy) |
| CO                                           | 0.60                       | lb/MMBtu <sup>2</sup> | 101                 | 2.52  |
| NO <sub>x</sub>                              | 0.22                       | lb/MMBtu <sup>2</sup> | 37.0                | 0.92  |
| SO <sub>2</sub>                              | 0.025                      | lb/MMBtu <sup>2</sup> | 4.20                | 0.11  |
| VOC                                          | 0.017                      | lb/MMBtu <sup>2</sup> | 2.86                | 0.071 |
| Total PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.56                       | lb/MMBtu <sup>3</sup> | 94.1                | 2.35  |
| CO <sub>2</sub>                              | 93.8                       | lb/MMBtu <sup>4</sup> | 34,741              | 869   |
| CH <sub>4</sub>                              | 0.0072                     | lb/MMBtu <sup>4</sup> | 2.67                | 0.067 |
| N <sub>2</sub> O                             | 0.0036                     | lb/MMBtu <sup>4</sup> | 1.33                | 0.033 |
| CO <sub>2</sub> e                            |                            |                       | 35,205              | 880   |

**Notes:**

- <sup>1</sup> During startup and shutdown (for temperature control) or malfunction, emissions will be vented out either the dryer bypass stacks or the furnace bypass stacks. Use of each bypass stack at full capacity will not exceed 50 hours per 12-month rolling period for each dryer line.
- <sup>2</sup> CO, NO<sub>x</sub>, SO<sub>2</sub>, and VOC emission rates based on AP-42, Chapter 1.6 - Wood Residue Combustion in Boilers, 09/03 for bark/bark and wet wood/wet wood-fired boilers.
- <sup>3</sup> VOC emission factor excludes formaldehyde.
- <sup>4</sup> Emission factor based on vendor data.
- <sup>5</sup> Emission factors for biomass combustion from Table C-1 and C-2 of 40 CFR Part 98 and Global Warming Potentials from Table A-1.



**Table 10c**  
**Potential Emissions - Furnace 1 Bypass (Full Capacity)<sup>1</sup>**  
**AA-009**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Potential HAP Emissions - Furnace Bypass Full Capacity**

| Pollutant                                       | Emission Factor <sup>1</sup> | Units    | Potential Emissions |             |
|-------------------------------------------------|------------------------------|----------|---------------------|-------------|
|                                                 |                              |          | (lb/hr)             | (tpy)       |
| Acetaldehyde                                    | 8.30E-04                     | lb/MMBtu | 1.39E-01            | 3.49E-03    |
| Acrolein                                        | 4.00E-03                     | lb/MMBtu | 6.72E-01            | 1.68E-02    |
| Formaldehyde                                    | 4.40E-03                     | lb/MMBtu | 7.39E-01            | 1.85E-02    |
| Phenol                                          | 5.10E-05                     | lb/MMBtu | 8.57E-03            | 2.14E-04    |
| Propionaldehyde                                 | 6.10E-05                     | lb/MMBtu | 1.02E-02            | 2.56E-04    |
| Acetophenone                                    | 3.20E-09                     | lb/MMBtu | 5.38E-07            | 1.34E-08    |
| Antimony and compounds                          | 7.90E-06                     | lb/MMBtu | 1.33E-03            | 3.32E-05    |
| Arsenic and compounds                           | 2.20E-05                     | lb/MMBtu | 3.70E-03            | 9.24E-05    |
| Benzo(a)pyrene                                  | 2.60E-06                     | lb/MMBtu | 4.37E-04            | 1.09E-05    |
| Beryllium metal                                 | 1.10E-06                     | lb/MMBtu | 1.85E-04            | 4.62E-06    |
| Cadmium metal                                   | 4.10E-06                     | lb/MMBtu | 6.89E-04            | 1.72E-05    |
| Carbon tetrachloride                            | 4.50E-05                     | lb/MMBtu | 7.56E-03            | 1.89E-04    |
| Chlorine                                        | 7.90E-04                     | lb/MMBtu | 1.33E-01            | 3.32E-03    |
| Chlorobenzene                                   | 3.30E-05                     | lb/MMBtu | 5.54E-03            | 1.39E-04    |
| Chromium-Other compounds                        | 1.75E-05                     | lb/MMBtu | 2.94E-03            | 7.35E-05    |
| Cobalt compounds                                | 6.50E-06                     | lb/MMBtu | 1.09E-03            | 2.73E-05    |
| Dinitrophenol, 2,4-                             | 1.80E-07                     | lb/MMBtu | 3.02E-05            | 7.56E-07    |
| Di(2-ethylhexyl)phthalate                       | 4.70E-08                     | lb/MMBtu | 7.90E-06            | 1.97E-07    |
| Ethyl benzene                                   | 3.10E-05                     | lb/MMBtu | 5.21E-03            | 1.30E-04    |
| Dichloroethane, 1,2-                            | 2.90E-05                     | lb/MMBtu | 4.87E-03            | 1.22E-04    |
| Hydrochloric acid                               | 1.90E-02                     | lb/MMBtu | 3.19E+00            | 7.98E-02    |
| Lead and lead compounds                         | 4.80E-05                     | lb/MMBtu | 8.06E-03            | 2.02E-04    |
| Manganese and compounds                         | 1.60E-03                     | lb/MMBtu | 2.69E-01            | 6.72E-03    |
| Mercury                                         | 3.50E-06                     | lb/MMBtu | 5.88E-04            | 1.47E-05    |
| Methyl bromide                                  | 1.50E-05                     | lb/MMBtu | 2.52E-03            | 6.30E-05    |
| Methyl chloride                                 | 2.30E-05                     | lb/MMBtu | 3.86E-03            | 9.66E-05    |
| Trichloroethane, 1,1,1-                         | 3.10E-05                     | lb/MMBtu | 5.21E-03            | 1.30E-04    |
| Naphthalene                                     | 9.70E-05                     | lb/MMBtu | 1.63E-02            | 4.07E-04    |
| Nickel metal                                    | 3.30E-05                     | lb/MMBtu | 5.54E-03            | 1.39E-04    |
| Nitrophenol, 4-                                 | 1.10E-07                     | lb/MMBtu | 1.85E-05            | 4.62E-07    |
| Pentachlorophenol                               | 5.10E-08                     | lb/MMBtu | 8.57E-06            | 2.14E-07    |
| Perchloroethylene                               | 3.80E-05                     | lb/MMBtu | 6.38E-03            | 1.60E-04    |
| Phosphorus metal, yellow or white               | 2.70E-05                     | lb/MMBtu | 4.54E-03            | 1.13E-04    |
| Polychlorinated biphenyls                       | 8.15E-09                     | lb/MMBtu | 1.37E-06            | 3.42E-08    |
| Total PAH (POM)                                 | 1.25E-04                     | lb/MMBtu | 2.10E-02            | 5.25E-04    |
| Dichloropropane, 1,2-                           | 3.30E-05                     | lb/MMBtu | 5.54E-03            | 1.39E-04    |
| Selenium compounds                              | 2.80E-06                     | lb/MMBtu | 4.70E-04            | 1.18E-05    |
| Tetrachlorodibenzo-p-dioxin, 2,3,7,8-           | 8.60E-12                     | lb/MMBtu | 1.44E-09            | 3.61E-11    |
| Trichloroethylene                               | 3.00E-05                     | lb/MMBtu | 5.04E-03            | 1.26E-04    |
| Trichlorophenol, 2,4,6-                         | 2.20E-08                     | lb/MMBtu | 3.70E-06            | 9.24E-08    |
| Vinyl chloride                                  | 1.80E-05                     | lb/MMBtu | 3.02E-03            | 7.56E-05    |
| <b>Total HAP Emissions (Biomass Combustion)</b> |                              |          | <b>5.28</b>         | <b>0.13</b> |

**Notes:**

<sup>1</sup> Emission factors for wood combustion in a stoker boiler from AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03.

**Abbreviations:**

CH<sub>4</sub> - methane  
CO - carbon monoxide  
CO<sub>2</sub> - carbon dioxide  
CO<sub>2</sub>e - carbon dioxide equivalent  
HAP - hazardous air pollutant  
hr - hour  
lb - pound  
MMBtu - Million British thermal units  
NO<sub>x</sub> - nitrogen oxides

N<sub>2</sub>O - nitrous oxide  
ODT - oven dried tons  
PM - particulate matter  
PM<sub>10</sub> - particulate matter with an aerodynamic diameter less than 10 microns.  
PM<sub>2.5</sub> - particulate matter with an aerodynamic diameter of 2.5 microns or less  
SO<sub>2</sub> - sulfur dioxide  
tpy - tons per year  
VOC - volatile organic compound  
yr - year

**Reference:**

AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03

**Table 10d**  
**Potential Emissions - Furnace 1 Bypass (Idle Mode)<sup>1</sup>**  
**AA-009**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Calculation Basis**

|                                 |                |
|---------------------------------|----------------|
| Hourly Throughput               | 42 ODT/hr      |
| Hourly Heat Input Capacity      | 5 MMBtu/hr     |
| Annual Heat Input Capacity      | 2,500 MMBtu/yr |
| Hours of Operation <sup>1</sup> | 500 hr/yr      |

**Potential Criteria Pollutant and Greenhouse Gas Emissions - Furnace Bypass "Idle Mode"**

| Pollutant               | Controlled Emission Factor | Units                 | Potential Emissions |       |
|-------------------------|----------------------------|-----------------------|---------------------|-------|
|                         |                            |                       | (lb/hr)             | (tpy) |
| CO                      | 0.60                       | lb/MMBtu <sup>2</sup> | 3.00                | 0.75  |
| NO <sub>x</sub>         | 0.22                       | lb/MMBtu <sup>2</sup> | 1.10                | 0.28  |
| SO <sub>2</sub>         | 0.025                      | lb/MMBtu <sup>2</sup> | 0.13                | 0.031 |
| VOC                     | 0.017                      | lb/MMBtu <sup>2</sup> | 0.085               | 0.021 |
| Total PM                | 0.56                       | lb/MMBtu <sup>3</sup> | 2.80                | 0.70  |
| Total PM <sub>10</sub>  | 0.52                       | lb/MMBtu <sup>2</sup> | 2.59                | 0.65  |
| Total PM <sub>2.5</sub> | 0.45                       | lb/MMBtu <sup>2</sup> | 2.24                | 0.56  |
| CO <sub>2</sub>         | 93.8                       | kg/MMBtu <sup>4</sup> | 1,034               | 258   |
| CH <sub>4</sub>         | 0.0072                     | kg/MMBtu <sup>4</sup> | 0.079               | 0.020 |
| N <sub>2</sub> O        | 0.0036                     | kg/MMBtu <sup>4</sup> | 0.040               | 0.010 |
| CO <sub>2</sub> e       |                            |                       | 1,048               | 262   |

**Notes:**

- <sup>1</sup> Idle mode is defined as operation at up to a maximum heat input rate of 5 MMBtu/hr.
- <sup>2</sup> CO, NO<sub>x</sub>, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and VOC emission rates based on AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03 for bark/bark and wet wood/wet wood-fired boilers. PM<sub>10</sub> and PM<sub>2.5</sub> factors equal to the sum of the filterable and condensable factors from Table 1.6-1. VOC emission factor excludes formaldehyde.
- <sup>3</sup> Emission factor based on vendor data.
- <sup>4</sup> Emission factors for biomass combustion from Table C-1 and C-2 of 40 CFR Part 98 and Global Warming Potentials from Table A-1.



**Table 10d**  
**Potential Emissions - Furnace 1 Bypass (Idle Mode)<sup>1</sup>**  
**AA-009**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Potential HAP Emissions - Furnace Bypass "Idle Mode"**

| Pollutant                                       | Emission Factor <sup>1</sup> | Units    | Potential Emissions |              |
|-------------------------------------------------|------------------------------|----------|---------------------|--------------|
|                                                 |                              |          | (lb/hr)             | (tpy)        |
| Acetaldehyde                                    | 8.30E-04                     | lb/MMBtu | 4.15E-03            | 1.04E-03     |
| Acrolein                                        | 4.00E-03                     | lb/MMBtu | 2.00E-02            | 5.00E-03     |
| Formaldehyde                                    | 4.40E-03                     | lb/MMBtu | 2.20E-02            | 5.50E-03     |
| Phenol                                          | 5.10E-05                     | lb/MMBtu | 2.55E-04            | 6.38E-05     |
| Propionaldehyde                                 | 6.10E-05                     | lb/MMBtu | 3.05E-04            | 7.63E-05     |
| Acetophenone                                    | 3.2E-09                      | lb/MMBtu | 1.60E-08            | 4.00E-09     |
| Antimony and compounds                          | 7.9E-06                      | lb/MMBtu | 3.95E-05            | 9.88E-06     |
| Arsenic and compounds                           | 2.2E-05                      | lb/MMBtu | 1.10E-04            | 2.75E-05     |
| Benzo(a)pyrene                                  | 2.6E-06                      | lb/MMBtu | 1.30E-05            | 3.25E-06     |
| Beryllium metal                                 | 1.1E-06                      | lb/MMBtu | 5.50E-06            | 1.38E-06     |
| Cadmium metal                                   | 4.1E-06                      | lb/MMBtu | 2.05E-05            | 5.13E-06     |
| Carbon tetrachloride                            | 4.5E-05                      | lb/MMBtu | 2.25E-04            | 5.63E-05     |
| Chlorine                                        | 7.9E-04                      | lb/MMBtu | 3.95E-03            | 9.88E-04     |
| Chlorobenzene                                   | 3.3E-05                      | lb/MMBtu | 1.65E-04            | 4.13E-05     |
| Chromium-Other compounds                        | 2.1E-05                      | lb/MMBtu | 1.05E-04            | 2.63E-05     |
| Cobalt compounds                                | 6.5E-06                      | lb/MMBtu | 3.25E-05            | 8.13E-06     |
| Dinitrophenol, 2,4-                             | 1.8E-07                      | lb/MMBtu | 9.00E-07            | 2.25E-07     |
| Di(2-ethylhexyl)phthalate                       | 4.7E-08                      | lb/MMBtu | 2.35E-07            | 5.88E-08     |
| Ethyl benzene                                   | 3.1E-05                      | lb/MMBtu | 1.55E-04            | 3.88E-05     |
| Dichloroethane, 1,2-                            | 2.9E-05                      | lb/MMBtu | 1.45E-04            | 3.63E-05     |
| Hydrochloric acid                               | 1.9E-02                      | lb/MMBtu | 9.50E-02            | 2.38E-02     |
| Lead and lead compounds                         | 4.8E-05                      | lb/MMBtu | 2.40E-04            | 6.00E-05     |
| Manganese and compounds                         | 1.6E-03                      | lb/MMBtu | 8.00E-03            | 2.00E-03     |
| Mercury                                         | 3.5E-06                      | lb/MMBtu | 1.75E-05            | 4.38E-06     |
| Methyl bromide                                  | 1.5E-05                      | lb/MMBtu | 7.50E-05            | 1.88E-05     |
| Methyl chloride                                 | 2.3E-05                      | lb/MMBtu | 1.15E-04            | 2.88E-05     |
| Trichloroethane, 1,1,1-                         | 3.1E-05                      | lb/MMBtu | 1.55E-04            | 3.88E-05     |
| Naphthalene                                     | 9.7E-05                      | lb/MMBtu | 4.85E-04            | 1.21E-04     |
| Nickel metal                                    | 3.3E-05                      | lb/MMBtu | 1.65E-04            | 4.13E-05     |
| Nitrophenol, 4-                                 | 1.1E-07                      | lb/MMBtu | 5.50E-07            | 1.38E-07     |
| Pentachlorophenol                               | 5.1E-08                      | lb/MMBtu | 2.55E-07            | 6.38E-08     |
| Perchloroethylene                               | 3.8E-05                      | lb/MMBtu | 1.90E-04            | 4.75E-05     |
| Phosphorus metal, yellow or white               | 2.7E-05                      | lb/MMBtu | 1.35E-04            | 3.38E-05     |
| Polychlorinated biphenyls                       | 8.2E-09                      | lb/MMBtu | 4.08E-08            | 1.02E-08     |
| Total PAH (POM)                                 | 1.3E-04                      | lb/MMBtu | 6.25E-04            | 1.56E-04     |
| Dichloropropane, 1,2-                           | 3.3E-05                      | lb/MMBtu | 1.65E-04            | 4.13E-05     |
| Selenium compounds                              | 2.8E-06                      | lb/MMBtu | 1.40E-05            | 3.50E-06     |
| Tetrachlorodibenzo-p-dioxin, 2,3,7,8-           | 8.6E-12                      | lb/MMBtu | 4.30E-11            | 1.08E-11     |
| Trichloroethylene                               | 3.0E-05                      | lb/MMBtu | 1.50E-04            | 3.75E-05     |
| Trichlorophenol, 2,4,6-                         | 2.2E-08                      | lb/MMBtu | 1.10E-07            | 2.75E-08     |
| Vinyl chloride                                  | 1.8E-05                      | lb/MMBtu | 9.00E-05            | 2.25E-05     |
| <b>Total HAP Emissions (Biomass Combustion)</b> |                              |          | <b>0.16</b>         | <b>0.039</b> |

**Notes:**

<sup>1</sup> Emission factors for wood combustion in a stoker boiler from AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03.

**Abbreviations:**

|                                               |                                                                                            |
|-----------------------------------------------|--------------------------------------------------------------------------------------------|
| CH <sub>4</sub> - methane                     | N <sub>2</sub> O - nitrous oxide                                                           |
| CO - carbon monoxide                          | ODT - oven dried tons                                                                      |
| CO <sub>2</sub> - carbon dioxide              | PM - particulate matter                                                                    |
| CO <sub>2</sub> e - carbon dioxide equivalent | PM <sub>10</sub> - particulate matter with an aerodynamic diameter less than 10 microns    |
| HAP - hazardous air pollutant                 | PM <sub>2.5</sub> - particulate matter with an aerodynamic diameter of 2.5 microns or less |
| hr - hour                                     | SO <sub>2</sub> - sulfur dioxide                                                           |
| kg - kilogram                                 | tpy - tons per year                                                                        |
| lb - pound                                    | VOC - volatile organic compound                                                            |
| MMBtu - Million British thermal units         | yr - year                                                                                  |
| NO <sub>x</sub> - nitrogen oxides             |                                                                                            |

**Reference:**

AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03

**Table 11a**  
**Potential Emissions at Outlet of Dryer Line 2 RTO Stack<sup>1</sup>**  
**AA-010**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Calculation Basis**

|                                                         |                             |
|---------------------------------------------------------|-----------------------------|
| Hourly Throughput (per line)                            | 42 ODT/hr                   |
| Annual Throughput (per line)                            | 367,920 ODT/yr              |
| Hourly Heat Input Capacity (per furnace)                | 168 MMBtu/hr                |
| Annual Heat Input Capacity (per furnace)                | 1,471,680 MMBtu/yr          |
| Hours of Operation                                      | 8,760 hr/yr                 |
| Number of RTO Burners (per RTO)                         | 2 burners                   |
| RTO Burner Rating                                       | 8 MMBtu/hr                  |
| Dryer Double Duct System - Num. of Burners <sup>2</sup> | 2 burners                   |
| Double Duct System Burner Rating <sup>2</sup>           | 1 MMBtu/hr                  |
| Propane Heating Value <sup>3</sup>                      | 91.5 MMBtu/Mgal             |
| Natural Gas Heating Value <sup>4</sup>                  | 1,020 Btu/scf               |
| Hourly Fuel Consumption (total) <sup>5</sup>            | 0.022 Mgal/hr propane       |
|                                                         | 0.0020 MMscf/hr natural gas |
| RTO Control Efficiency <sup>6</sup>                     | 95%                         |

**Potential Criteria Pollutant and Greenhouse Gas Emissions**

| Pollutant                                                       | Controlled Emission Factor | Units                  | Potential Emissions from Dryer <sup>7</sup> |         |
|-----------------------------------------------------------------|----------------------------|------------------------|---------------------------------------------|---------|
|                                                                 |                            |                        | (lb/hr)                                     | (tpy)   |
| CO                                                              | 14.2                       | lb/hr <sup>8</sup>     | 14.2                                        | 62.2    |
| NO <sub>x</sub>                                                 | 17.0                       | lb/hr <sup>9</sup>     | 17.0                                        | 74.5    |
| SO <sub>2</sub>                                                 | 0.025                      | lb/MMBtu <sup>10</sup> | 4.20                                        | 18.4    |
| VOC as Propane                                                  | 8.75                       | lb/hr <sup>8</sup>     | 8.75                                        | 38.3    |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> (Filterable)             | 4.69                       | lb/hr <sup>11</sup>    | 4.69                                        | 20.5    |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> (Condensable)            | 0.017                      | lb/MMBtu <sup>12</sup> | 2.86                                        | 12.5    |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> (Condensable - Nat. Gas) | 0.00056                    | lb/MMBtu <sup>13</sup> | 0.0089                                      | 0.039   |
| CO <sub>2</sub>                                                 | 780                        | lb/ODT <sup>14</sup>   | 32,760                                      | 143,489 |

**Notes:**

- <sup>1</sup> Emissions from the Green Hammermills will be routed through the Dryer Line 1 WESP and RTO. If Dryer Line 1 is not operational, the Green Hammermill exhaust will be routed to the WESP/RTO on Dryer Line 2. For purposes of potential emissions, emissions from the Green Hammermills are shown under Dryer Line 1 (AA-007) only to avoid double-counting emissions.
- <sup>2</sup> Each dryer system will include two (2) ducts (i.e., double ducts) that will each be heated by a 1 MMBtu/hr burner. There will be a total of six (6) burners, two (2) per dryer line. The burners will fire natural gas, with propane as a back-up, and will be low-NO<sub>x</sub> burners.
- <sup>3</sup> Propane heat content from AP-42 Section 1.5 - Liquefied Petroleum Gas Production, 7/08.
- <sup>4</sup> Natural gas heating value from AP-42 Section 1.4 - Natural Gas Combustion, 07/98.
- <sup>5</sup> Total hourly fuel consumption for both burners. The burners will fire natural gas, with propane as a back-up.
- <sup>6</sup> Control efficiency based on RTO vendor guarantee.
- <sup>7</sup> Exhaust from the dryers are routed to a WESP and then RTO for control of VOC, HAP, and particulates. Each of the three (3) dryer lines will have a dedicated WESP and RTO. Emissions for Dryer Lines 1 and 3 are calculated separately.
- <sup>8</sup> CO and VOC emission rates based on vendor data.
- <sup>9</sup> NO<sub>x</sub> emission factor based on stack testing at similar Enviva plants.
- <sup>10</sup> No emission factor is provided in AP-42, Section 10.6.2 for SO<sub>2</sub> for rotary dryers. Enviva has conservatively calculated SO<sub>2</sub> emissions based on AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03.
- <sup>11</sup> Filterable particulate emission rate based on RTO vendor data.
- <sup>12</sup> Condensable particulate emission factor for biomass combustion obtained from AP-42 Section 1.6.
- <sup>13</sup> Natural gas combustion by the RTO burners will also result in emissions of condensable PM. Emission factor obtained from AP-42, Section 1.4 - Natural Gas Combustion, 07/98.
- <sup>14</sup> Emission factor for CO<sub>2</sub> from AP-42, Section 10.6.1 for rotary dryer with RTO control device. Enviva has conservatively calculated the CO<sub>2</sub> emissions using the hardwood emission factor because the dryers at the Lucedale plant will use a combination of hardwood and softwood and the hardwood emission factor is greater than the softwood emission factor.



**Table 11a**  
**Potential Emissions at Outlet of Dryer Line 2 RTO Stack<sup>1</sup>**  
**AA-010**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Potential Criteria Pollutant and Greenhouse Gas Emissions - Dryer System Double Duct Burners<sup>1</sup>**

| Pollutant                                          | Natural Gas<br>Emission<br>Factor <sup>2,3</sup><br>(lb/MMscf) | Potential Emissions -<br>Natural Gas Combustion |          | Propane<br>Emission<br>Factor <sup>4,5,6</sup><br>(lb/Mgal) | Potential Emissions -<br>Propane Combustion |        |
|----------------------------------------------------|----------------------------------------------------------------|-------------------------------------------------|----------|-------------------------------------------------------------|---------------------------------------------|--------|
|                                                    |                                                                | (lb/hr)                                         | (tpy)    |                                                             | (lb/hr)                                     | (tpy)  |
| CO                                                 | 84.0                                                           | 0.16                                            | 0.72     | 7.50                                                        | 0.16                                        | 0.72   |
| NO <sub>x</sub>                                    | 50.0                                                           | 0.10                                            | 0.43     | 6.50                                                        | 0.14                                        | 0.62   |
| SO <sub>2</sub>                                    | 0.60                                                           | 0.0012                                          | 0.0052   | 0.054                                                       | 0.0012                                      | 0.0052 |
| VOC                                                | 5.50                                                           | 5.39E-04                                        | 0.0024   | 1.00                                                        | 0.0011                                      | 0.0048 |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> Condensable | 5.70                                                           | 5.59E-04                                        | 0.0024   | 0.50                                                        | 5.46E-04                                    | 0.0024 |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> Filterable  | 1.90                                                           | 1.86E-04                                        | 8.16E-04 | 0.20                                                        | 2.19E-04                                    | 0.0010 |
| Total PM/PM <sub>10</sub> /PM <sub>2.5</sub>       | --                                                             | 7.45E-04                                        | 0.0033   | --                                                          | 7.65E-04                                    | 0.0034 |
| CO <sub>2</sub>                                    | 120,000                                                        | 235                                             | 1,031    | 12,500                                                      | 273                                         | 1,197  |
| CH <sub>4</sub>                                    | 2.30                                                           | 0.0045                                          | 0.020    | 0.20                                                        | 0.0044                                      | 0.019  |
| N <sub>2</sub> O <sup>2</sup>                      | 0.64                                                           | 0.0013                                          | 0.0055   | 0.90                                                        | 0.020                                       | 0.0862 |
| CO <sub>2</sub> e                                  | --                                                             | 236                                             | 1,033    | --                                                          | 279                                         | 1,223  |

**Notes:**

- <sup>1</sup> Two (2) low-NO<sub>x</sub> burners will be used to heat the dryer system ducts to prevent condensation of wood tar from occurring and thus reduce the fire risk. The burners will combust natural gas. Emissions from the burners will be routed to the WESP and RTO on each dryer line; therefore, a 95% control efficiency was applied to VOC and PM/PM<sub>10</sub>/PM<sub>2.5</sub>.
- <sup>2</sup> Emission factors for natural gas combustion from AP-42 Section 1.4 - Natural Gas Combustion, 07/98. Natural gas heating value of 1,020 Btu/scf assumed per AP-42.
- <sup>3</sup> Emission factors for NO<sub>x</sub> and N<sub>2</sub>O assume burners are low NO<sub>x</sub> burners, per email from Kai Simonsen (Enviva) on August 8, 2018.
- <sup>4</sup> Emission factors for propane combustion obtained from AP-42 Section 1.5 - Liquefied Petroleum Gas Combustion, 07/08.
- <sup>5</sup> AP-42 Section 1.5 does not include an emission factor for low NO<sub>x</sub> burners. Per AP-42 Section 1.4, low NO<sub>x</sub> burners reduce NO<sub>x</sub> emissions by accomplishing combustion in stages, reducing NO<sub>x</sub> emissions 40 to 85% relative to uncontrolled emission levels. A conservative control efficiency of 50% was applied to the uncontrolled NO<sub>x</sub> emission factor from AP-42 Section 1.5. This reduction is consistent with the magnitude of reduction between the uncontrolled and low NO<sub>x</sub> emission factors in AP-42 Section 1.4.
- <sup>6</sup> SO<sub>2</sub> emissions are based on an assumed fuel sulfur content of 0.54 grains/100 ft<sup>3</sup> per A National Methodology and Emission Inventory for Residential Fuel Combustion.



**Table 11a**  
**Potential Emissions at Outlet of Dryer Line 2 RTO Stack<sup>1</sup>**  
**AA-010**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Potential HAP Emissions**

| Pollutant                                | VOC | Emission Factor | Units    | Footnote | Potential Emissions |          |
|------------------------------------------|-----|-----------------|----------|----------|---------------------|----------|
|                                          |     |                 |          |          | (lb/hr)             | (tpy)    |
| Furnace - Biomass Combustion             |     |                 |          |          |                     |          |
| Acetaldehyde                             | Y   | 4.88E-03        | lb/ODT   | 1        | 0.20                | 0.90     |
| Acrolein                                 | Y   | 2.43E-03        | lb/ODT   | 1        | 0.10                | 0.45     |
| Formaldehyde                             | Y   | 2.84E-03        | lb/ODT   | 1        | 0.12                | 0.52     |
| Methanol                                 | Y   | 4.24E-03        | lb/ODT   | 1        | 0.18                | 0.78     |
| Phenol                                   | Y   | 3.84E-03        | lb/ODT   | 1        | 0.16                | 0.71     |
| Propionaldehyde                          | Y   | 1.39E-03        | lb/ODT   | 1        | 0.058               | 0.26     |
| Acetophenone                             | Y   | 3.20E-09        | lb/MMBtu | 1        | 2.69E-08            | 1.18E-07 |
| Antimony and compounds                   | N   | 7.90E-06        | lb/MMBtu | 2,4      | 6.64E-05            | 2.91E-04 |
| Arsenic and compounds                    | N   | 2.20E-05        | lb/MMBtu | 2,4      | 1.85E-04            | 8.09E-04 |
| Benzene                                  | Y   | 4.20E-03        | lb/MMBtu | 2,3      | 0.035               | 0.15     |
| Benzo(a)pyrene                           | Y   | 2.60E-06        | lb/MMBtu | 2,3      | 2.18E-05            | 9.57E-05 |
| Beryllium metal                          | N   | 1.10E-06        | lb/MMBtu | 2,4      | 9.24E-06            | 4.05E-05 |
| Cadmium metal                            | N   | 4.10E-06        | lb/MMBtu | 2,4      | 3.44E-05            | 1.51E-04 |
| Carbon tetrachloride                     | Y   | 4.50E-05        | lb/MMBtu | 2,3      | 3.78E-04            | 1.66E-03 |
| Chlorine                                 | N   | 7.90E-04        | lb/MMBtu | 2        | 0.13                | 0.58     |
| Chlorobenzene                            | Y   | 3.30E-05        | lb/MMBtu | 2,3      | 2.77E-04            | 1.21E-03 |
| Chloroform                               | Y   | 2.80E-05        | lb/MMBtu | 2,3      | 2.35E-04            | 1.03E-03 |
| Chromium-Other compounds                 | N   | 1.75E-05        | lb/MMBtu | 2,4      | 1.47E-04            | 6.44E-04 |
| Cobalt compounds                         | N   | 6.50E-06        | lb/MMBtu | 2,4      | 5.46E-05            | 2.39E-04 |
| Dichloroethane, 1,2-                     | Y   | 2.90E-05        | lb/MMBtu | 2,3      | 2.44E-04            | 1.07E-03 |
| Dichloropropane, 1,2-                    | Y   | 3.30E-05        | lb/MMBtu | 2,3      | 2.77E-04            | 1.21E-03 |
| Dinitrophenol, 2,4-                      | Y   | 1.80E-07        | lb/MMBtu | 2,3      | 1.51E-06            | 6.62E-06 |
| Di(2-ethylhexyl)phthalate                | Y   | 4.70E-08        | lb/MMBtu | 2,3      | 3.95E-07            | 1.73E-06 |
| Ethyl benzene                            | Y   | 3.10E-05        | lb/MMBtu | 2,3      | 2.60E-04            | 1.14E-03 |
| Hydrochloric acid                        | N   | 1.90E-02        | lb/MMBtu | 2,5      | 0.32                | 1.40     |
| Lead and lead compounds                  | N   | 4.80E-05        | lb/MMBtu | 2,4      | 4.03E-04            | 1.77E-03 |
| Manganese and compounds                  | N   | 1.60E-03        | lb/MMBtu | 2,4      | 0.013               | 0.059    |
| Mercury                                  | N   | 3.50E-06        | lb/MMBtu | 2,4      | 2.94E-05            | 1.29E-04 |
| Methyl bromide                           | Y   | 1.50E-05        | lb/MMBtu | 2,3      | 1.26E-04            | 5.52E-04 |
| Methyl chloride                          | Y   | 2.30E-05        | lb/MMBtu | 2,3      | 1.93E-04            | 8.46E-04 |
| Methylene chloride                       | Y   | 2.90E-04        | lb/MMBtu | 2,3      | 0.0024              | 0.011    |
| Naphthalene                              | Y   | 9.70E-05        | lb/MMBtu | 2,3      | 8.15E-04            | 0.0036   |
| Nickel metal                             | N   | 3.30E-05        | lb/MMBtu | 2,4      | 2.77E-04            | 1.21E-03 |
| Nitrophenol, 4-                          | Y   | 1.10E-07        | lb/MMBtu | 2,3      | 9.24E-07            | 4.05E-06 |
| Pentachlorophenol                        | N   | 5.10E-08        | lb/MMBtu | 2        | 8.57E-06            | 3.75E-05 |
| Perchloroethylene                        | N   | 3.80E-05        | lb/MMBtu | 2        | 0.0064              | 0.028    |
| Phosphorus metal, yellow or white        | N   | 2.70E-05        | lb/MMBtu | 2,4      | 2.27E-04            | 9.93E-04 |
| Polychlorinated biphenyls                | Y   | 8.15E-09        | lb/MMBtu | 2,3      | 6.85E-08            | 3.00E-07 |
| Polycyclic Organic Matter                | N   | 1.25E-04        | lb/MMBtu | 2        | 0.021               | 0.092    |
| Selenium compounds                       | N   | 2.80E-06        | lb/MMBtu | 2,4      | 2.35E-05            | 1.03E-04 |
| Styrene                                  | Y   | 1.90E-03        | lb/MMBtu | 2,3      | 0.016               | 0.070    |
| Tetrachlorodibenzo-p-dioxin, 2,3,7,8-    | Y   | 8.60E-12        | lb/MMBtu | 2,3      | 7.22E-11            | 3.16E-10 |
| Toluene                                  | Y   | 3.00E-05        | lb/MMBtu | 2,3      | 2.52E-04            | 1.10E-03 |
| Trichloroethane, 1,1,1-                  | N   | 3.10E-05        | lb/MMBtu | 2        | 5.21E-03            | 2.28E-02 |
| Trichloroethylene                        | Y   | 3.00E-05        | lb/MMBtu | 2,3      | 2.52E-04            | 1.10E-03 |
| Trichlorophenol, 2,4,6-                  | Y   | 2.20E-08        | lb/MMBtu | 2,3      | 1.85E-07            | 8.09E-07 |
| Vinyl chloride                           | Y   | 1.80E-05        | lb/MMBtu | 2,3      | 1.51E-04            | 6.62E-04 |
| Xylene                                   | Y   | 2.50E-05        | lb/MMBtu | 2,3      | 2.10E-04            | 9.20E-04 |
| Total HAP Emissions (biomass combustion) |     |                 |          |          | 1.38                | 6.05     |



**Table 11a**  
**Potential Emissions at Outlet of Dryer Line 2 RTO Stack<sup>1</sup>**  
**AA-010**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Potential HAP Emissions**

| Pollutant                                                                 | VOC | Emission Factor <sup>6</sup> | Units    | RTO Burners Potential Emissions |          | Double Duct Burners Potential Emissions <sup>3,4</sup> |          |
|---------------------------------------------------------------------------|-----|------------------------------|----------|---------------------------------|----------|--------------------------------------------------------|----------|
|                                                                           |     |                              |          | (lb/hr)                         | (tpy)    | (lb/hr)                                                | (tpy)    |
| RTO Burners and Dryer System Double Duct Burners - Natural Gas Combustion |     |                              |          |                                 |          |                                                        |          |
| 2-Methylnaphthalene                                                       | Y   | 2.40E-05                     | lb/MMscf | 3.76E-07                        | 1.65E-06 | 2.35E-09                                               | 1.03E-08 |
| 3-Methylchloranthrene                                                     | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| 7,12-Dimethylbenz(a)anthracene                                            | Y   | 1.60E-05                     | lb/MMscf | 2.51E-07                        | 1.10E-06 | 1.57E-09                                               | 6.87E-09 |
| Acenaphthene                                                              | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| Acenaphthylene                                                            | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| Anthracene                                                                | Y   | 2.40E-06                     | lb/MMscf | 3.76E-08                        | 1.65E-07 | 2.35E-10                                               | 1.03E-09 |
| Arsenic and compounds                                                     | N   | 2.00E-04                     | lb/MMscf | 3.14E-06                        | 1.37E-05 | 1.96E-08                                               | 8.59E-08 |
| Benz(a)anthracene                                                         | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| Benzene                                                                   | Y   | 2.10E-03                     | lb/MMscf | 3.29E-05                        | 1.44E-04 | 2.06E-07                                               | 9.02E-07 |
| Benzo(a)pyrene                                                            | Y   | 1.20E-06                     | lb/MMscf | 1.88E-08                        | 8.24E-08 | 1.18E-10                                               | 5.15E-10 |
| Benzo(b)fluoranthene                                                      | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| Benzo(g,h,i)perylene                                                      | Y   | 1.20E-06                     | lb/MMscf | 1.88E-08                        | 8.24E-08 | 1.18E-10                                               | 5.15E-10 |
| Benzo(k)fluoranthene                                                      | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| Beryllium metal                                                           | N   | 1.20E-05                     | lb/MMscf | 1.88E-07                        | 8.24E-07 | 1.18E-09                                               | 5.15E-09 |
| Cadmium metal                                                             | N   | 1.10E-03                     | lb/MMscf | 1.73E-05                        | 7.56E-05 | 1.08E-07                                               | 4.72E-07 |
| Chromium VI                                                               | N   | 1.40E-03                     | lb/MMscf | 2.20E-05                        | 9.62E-05 | 1.37E-07                                               | 6.01E-07 |
| Chrysene                                                                  | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| Cobalt compounds                                                          | N   | 8.40E-05                     | lb/MMscf | 1.32E-06                        | 5.77E-06 | 8.24E-09                                               | 3.61E-08 |
| Dibenzo(a,h)anthracene                                                    | Y   | 1.20E-06                     | lb/MMscf | 1.88E-08                        | 8.24E-08 | 1.18E-10                                               | 5.15E-10 |
| Dichlorobenzene                                                           | Y   | 1.20E-03                     | lb/MMscf | 1.88E-05                        | 8.24E-05 | 1.18E-07                                               | 5.15E-07 |
| Fluoranthene                                                              | Y   | 3.00E-06                     | lb/MMscf | 4.71E-08                        | 2.06E-07 | 2.94E-10                                               | 1.29E-09 |
| Fluorene                                                                  | Y   | 2.80E-06                     | lb/MMscf | 4.39E-08                        | 1.92E-07 | 2.75E-10                                               | 1.20E-09 |
| Formaldehyde                                                              | Y   | 0.075                        | lb/MMscf | 0.0012                          | 0.0052   | 7.35E-06                                               | 3.22E-05 |
| Hexane                                                                    | Y   | 1.80                         | lb/MMscf | 0.028                           | 0.12     | 1.76E-04                                               | 7.73E-04 |
| Indeno(1,2,3-cd)pyrene                                                    | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| Lead and lead compounds                                                   | N   | 5.00E-04                     | lb/MMscf | 7.84E-06                        | 3.44E-05 | 4.90E-08                                               | 2.15E-07 |
| Manganese and compounds                                                   | N   | 3.80E-04                     | lb/MMscf | 5.96E-06                        | 2.61E-05 | 3.73E-08                                               | 1.63E-07 |
| Mercury                                                                   | N   | 2.60E-04                     | lb/MMscf | 4.08E-06                        | 1.79E-05 | 2.55E-08                                               | 1.12E-07 |
| Naphtthalene                                                              | Y   | 6.10E-04                     | lb/MMscf | 9.57E-06                        | 4.19E-05 | 5.98E-08                                               | 2.62E-07 |
| Nickel metal                                                              | N   | 2.10E-03                     | lb/MMscf | 3.29E-05                        | 1.44E-04 | 2.06E-07                                               | 9.02E-07 |
| Phenanthrene                                                              | Y   | 1.70E-05                     | lb/MMscf | 2.67E-07                        | 1.17E-06 | 1.67E-09                                               | 7.30E-09 |
| Pyrene                                                                    | Y   | 5.00E-06                     | lb/MMscf | 7.84E-08                        | 3.44E-07 | 4.90E-10                                               | 2.15E-09 |
| Selenium compounds                                                        | N   | 2.40E-05                     | lb/MMscf | 3.76E-07                        | 1.65E-06 | 2.35E-09                                               | 1.03E-08 |
| Toluene                                                                   | Y   | 3.40E-03                     | lb/MMscf | 5.33E-05                        | 2.34E-04 | 3.33E-07                                               | 1.46E-06 |
| Total HAP Emissions (Natural Gas Combustion) <sup>7</sup>                 |     |                              |          | 0.030                           | 0.13     | 1.85E-04                                               | 8.10E-04 |

**Table 11a**  
**Potential Emissions at Outlet of Dryer Line 2 RTO Stack<sup>1</sup>**  
**AA-010**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Potential HAP Emissions**

| Pollutant                                             | VOC | Emission Factor <sup>a</sup> | Units    | RTO Burners Potential Emissions |        | Double Duct Burners Potential Emissions <sup>3,4</sup> |          |
|-------------------------------------------------------|-----|------------------------------|----------|---------------------------------|--------|--------------------------------------------------------|----------|
|                                                       |     |                              |          | (lb/hr)                         | (tpy)  | (lb/hr)                                                | (tpy)    |
| RTO Burners - Propane Combustion                      |     |                              |          |                                 |        |                                                        |          |
| Benzene                                               | Y   | 7.10E-04                     | lb/MMBtu | 0.011                           | 0.050  | 7.10E-05                                               | 3.11E-05 |
| Formaldehyde                                          | Y   | 1.51E-03                     | lb/MMBtu | 0.024                           | 0.11   | 1.51E-04                                               | 6.61E-05 |
| PAHs                                                  | N   | 4.00E-05                     | lb/MMBtu | 6.40E-04                        | 0.0028 | 8.00E-05                                               | 7.01E-04 |
| Total HAP Emissions (Propane Combustion) <sup>7</sup> |     |                              |          | 0.036                           | 0.16   | 3.02E-04                                               | 7.98E-04 |

**Notes:**

- <sup>1</sup> Emission factor derived based on stack testing data from comparable Enviva facilities.
- <sup>2</sup> Emission factors for wood combustion in a stoker boiler from AP-42 Section 1.6 - Wood Residue Combustion in Boilers, 09/03.
- <sup>3</sup> A control efficiency of 95% for the RTOs is applied to all organic HAP for those emission factors that are not derived from Enviva stack test data.
- <sup>4</sup> A 95% control efficiency for the wet electrostatic precipitator (WESP) is applied to all metal HAP.
- <sup>5</sup> The WESP will employ a caustic solution in its operation in which hydrochloric acid will have high water solubility. This caustic solution will neutralize the acid and effectively control it by 90%, per conversation on October 18, 2011 with Steven A. Jaasund, P.E. of Lundberg Associates, a manufacturer of WESPs.
- <sup>6</sup> Emission factors for natural gas combustion from AP-42 Section 1.4 - Natural Gas Combustion, 07/98. Natural gas heating value of 1,020 Btu/scf assumed per AP-42.
- <sup>7</sup> The RTO burners and burners for the dryer system double ducts will fire natural gas with propane as a back-up; however, propane is worst-case for HAP emissions.
- <sup>8</sup> Emission factors for propane combustion from the South Coast Air Quality Management District's Air Emissions Reporting Tool for external combustion equipment fired with LPG.

**Abbreviations:**

|                                               |                                                                                            |
|-----------------------------------------------|--------------------------------------------------------------------------------------------|
| CAS - chemical abstract service               | N <sub>2</sub> O - nitrous oxide                                                           |
| CH <sub>4</sub> - methane                     | ODT - oven dried tons                                                                      |
| CO - carbon monoxide                          | PM - particulate matter                                                                    |
| CO <sub>2</sub> - carbon dioxide              | PM <sub>10</sub> - particulate matter with an aerodynamic diameter less than 10 microns    |
| CO <sub>2</sub> e - carbon dioxide equivalent | PM <sub>2.5</sub> - particulate matter with an aerodynamic diameter of 2.5 microns or less |
| HAP - hazardous air pollutant                 | RTO - regenerative thermal oxidizer                                                        |
| hr - hour                                     | SO <sub>2</sub> - sulfur dioxide                                                           |
| kg - kilogram                                 | tpy - tons per year                                                                        |
| lb - pound                                    | VOC - volatile organic compound                                                            |
| MMBtu - Million British thermal units         | WESP - wet electrostatic precipitator                                                      |
| NO <sub>x</sub> - nitrogen oxides             | yr - year                                                                                  |

**References:**

AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03  
AP-42, Section 1.4 - Natural Gas Combustion, 07/98  
South Coast Air Quality Management District. AER Reporting tool. Emission factors available in the Help and Support Manual at: <http://www.aqmd.gov/home/rules-compliance/compliance/annual-emission-reporting>



**Table 11b**  
**Potential Emissions - Dryer 2 Bypass (Full Capacity)<sup>1</sup>**  
**AA-011**

Enviva Pellets Lucedale, LLC  
Lucedale, George County, Mississippi

**Calculation Basis**

|                                 |                |
|---------------------------------|----------------|
| Hourly Throughput               | 42 ODT/hr      |
| Hourly Heat Input Capacity      | 168 MMBtu/hr   |
| Annual Heat Input Capacity      | 8,400 MMBtu/yr |
| Hours of Operation <sup>1</sup> | 50 hr/yr       |

**Potential Criteria Pollutant and Greenhouse Gas Emissions - Dryer Bypass Full Capacity**

| Pollutant                                          | Controlled Emission Factor | Units                 | Potential Emissions |       |
|----------------------------------------------------|----------------------------|-----------------------|---------------------|-------|
|                                                    |                            |                       | (lb/hr)             | (tpy) |
| CO                                                 | 21.4                       | lb/hr <sup>2</sup>    | 21.4                | 0.54  |
| NO <sub>x</sub>                                    | 26.3                       | lb/hr <sup>2</sup>    | 26.3                | 0.66  |
| SO <sub>2</sub>                                    | 0.025                      | lb/MMBtu <sup>3</sup> | 4.20                | 0.11  |
| VOC                                                | 14.0                       | lb/hr <sup>2</sup>    | 14.0                | 0.35  |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> Condensable | 0.017                      | lb/MMBtu <sup>4</sup> | 2.86                | 0.071 |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> Filterable  | 0.33                       | lb/MMBtu <sup>5</sup> | 55.4                | 1.39  |
| Total PM/PM <sub>10</sub> /PM <sub>2.5</sub>       |                            |                       | 58.3                | 1.46  |
| CO <sub>2</sub>                                    | 93.8                       | kg/MMBtu <sup>6</sup> | 34,741              | 869   |
| CH <sub>4</sub>                                    | 0.0072                     | kg/MMBtu <sup>6</sup> | 2.67                | 0.067 |
| N <sub>2</sub> O                                   | 0.0036                     | kg/MMBtu <sup>6</sup> | 1.33                | 0.033 |
| CO <sub>2</sub> e                                  |                            |                       | 35,205              | 880   |

**Notes:**

- <sup>1</sup> During startup and shutdown (for temperature control) or malfunction, emissions will be vented out either the dryer bypass stacks or the furnace bypass stacks. Use of each bypass stack at full capacity will not exceed 50 hours per 12-month rolling period for each dryer line.
- <sup>2</sup> CO, NO<sub>x</sub>, and VOC emission rates based on vendor data.
- <sup>3</sup> No emission factor is provided in AP-42, Section 10.6.2 for SO<sub>2</sub> for rotary dryers. Enviva has conservatively calculated SO<sub>2</sub> emissions based on AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03.
- <sup>4</sup> Emission factor for condensable PM based on AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03.
- <sup>5</sup> Uncontrolled filterable PM emission factor is based on testing at a comparable Enviva facility.
- <sup>6</sup> Emission factors for biomass combustion (dryer) from Table C-1 and C-2 of 40 CFR Part 98 and Global Warming Potentials from Table A-1.

**Table 11b**  
**Potential Emissions - Dryer 2 Bypass (Full Capacity)<sup>1</sup>**  
**AA-011**

Enviva Pellets Lucedale, LLC  
Lucedale, George County, Mississippi

**Potential HAP Emissions - Dryer Bypass Full Capacity**

| Pollutant                             | Emission Factor | Units    | Footnote | Potential Emissions <sup>1</sup> |             |
|---------------------------------------|-----------------|----------|----------|----------------------------------|-------------|
|                                       |                 |          |          | (lb/hr)                          | (tpy)       |
| Acetaldehyde                          | 0.10            | lb/ODT   | 2        | 4.10                             | 0.10        |
| Acrolein                              | 0.049           | lb/ODT   | 2        | 2.04                             | 0.051       |
| Formaldehyde                          | 0.057           | lb/ODT   | 2        | 2.39                             | 0.060       |
| Methanol                              | 0.085           | lb/ODT   | 2        | 3.56                             | 0.089       |
| Phenol                                | 0.077           | lb/ODT   | 2        | 3.23                             | 0.081       |
| Propionaldehyde                       | 0.028           | lb/ODT   | 2        | 1.16                             | 0.029       |
| Acetophenone                          | 3.20E-09        | lb/MMBtu | 3        | 5.38E-07                         | 1.34E-08    |
| Antimony and compounds                | 7.90E-06        | lb/MMBtu | 3        | 1.33E-03                         | 3.32E-05    |
| Arsenic and compounds                 | 2.20E-05        | lb/MMBtu | 3        | 3.70E-03                         | 9.24E-05    |
| Benzo(a)pyrene                        | 2.60E-06        | lb/MMBtu | 3        | 4.37E-04                         | 1.09E-05    |
| Beryllium metal                       | 1.10E-06        | lb/MMBtu | 3        | 1.85E-04                         | 4.62E-06    |
| Cadmium metal                         | 4.10E-06        | lb/MMBtu | 3        | 6.89E-04                         | 1.72E-05    |
| Carbon tetrachloride                  | 4.50E-05        | lb/MMBtu | 3        | 7.56E-03                         | 1.89E-04    |
| Chlorine                              | 7.90E-04        | lb/MMBtu | 3        | 0.13                             | 0.0033      |
| Chlorobenzene                         | 3.30E-05        | lb/MMBtu | 3        | 5.54E-03                         | 1.39E-04    |
| Chromium-Other compounds              | 1.75E-05        | lb/MMBtu | 3        | 2.94E-03                         | 7.35E-05    |
| Cobalt compounds                      | 6.50E-06        | lb/MMBtu | 3        | 1.09E-03                         | 2.73E-05    |
| Dinitrophenol, 2,4-                   | 1.80E-07        | lb/MMBtu | 3        | 3.02E-05                         | 7.56E-07    |
| Di(2-ethylhexyl)phthalate             | 4.70E-08        | lb/MMBtu | 3        | 7.90E-06                         | 1.97E-07    |
| Ethyl benzene                         | 3.10E-05        | lb/MMBtu | 3        | 5.21E-03                         | 1.30E-04    |
| Dichloroethane, 1,2-                  | 2.90E-05        | lb/MMBtu | 3        | 4.87E-03                         | 1.22E-04    |
| Hydrochloric acid                     | 1.90E-02        | lb/MMBtu | 3        | 3.19                             | 0.080       |
| Lead and lead compounds               | 4.80E-05        | lb/MMBtu | 3        | 8.06E-03                         | 2.02E-04    |
| Manganese and compounds               | 1.60E-03        | lb/MMBtu | 3        | 0.27                             | 6.72E-03    |
| Mercury                               | 3.50E-06        | lb/MMBtu | 3        | 5.88E-04                         | 1.47E-05    |
| Methyl bromide                        | 1.50E-05        | lb/MMBtu | 3        | 2.52E-03                         | 6.30E-05    |
| Methyl chloride                       | 2.30E-05        | lb/MMBtu | 3        | 3.86E-03                         | 9.66E-05    |
| Trichloroethane, 1,1,1-               | 3.10E-05        | lb/MMBtu | 3        | 5.21E-03                         | 1.30E-04    |
| Naphthalene                           | 9.70E-05        | lb/MMBtu | 3        | 0.016                            | 4.07E-04    |
| Nickel metal                          | 3.30E-05        | lb/MMBtu | 3        | 5.54E-03                         | 1.39E-04    |
| Nitrophenol, 4-                       | 1.10E-07        | lb/MMBtu | 3        | 1.85E-05                         | 4.62E-07    |
| Pentachlorophenol                     | 5.10E-08        | lb/MMBtu | 3        | 8.57E-06                         | 2.14E-07    |
| Perchloroethylene                     | 3.80E-05        | lb/MMBtu | 3        | 6.38E-03                         | 1.60E-04    |
| Phosphorus metal, yellow or white     | 2.70E-05        | lb/MMBtu | 3        | 4.54E-03                         | 1.13E-04    |
| Polychlorinated biphenyls             | 8.15E-09        | lb/MMBtu | 3        | 1.37E-06                         | 3.42E-08    |
| Total PAH (POM)                       | 1.25E-04        | lb/MMBtu | 3        | 0.021                            | 5.25E-04    |
| Dichloropropane, 1,2-                 | 3.30E-05        | lb/MMBtu | 3        | 5.54E-03                         | 1.39E-04    |
| Selenium compounds                    | 2.80E-06        | lb/MMBtu | 3        | 4.70E-04                         | 1.18E-05    |
| Tetrachlorodibenzo-p-dioxin, 2,3,7,8- | 8.60E-12        | lb/MMBtu | 3        | 1.44E-09                         | 3.61E-11    |
| Trichloroethylene                     | 3.00E-05        | lb/MMBtu | 3        | 5.04E-03                         | 1.26E-04    |
| Trichlorophenol, 2,4,6-               | 2.20E-08        | lb/MMBtu | 3        | 3.70E-06                         | 9.24E-08    |
| Vinyl chloride                        | 1.80E-05        | lb/MMBtu | 3        | 3.02E-03                         | 7.56E-05    |
| <b>Total HAP Emissions</b>            |                 |          |          | <b>20.2</b>                      | <b>0.50</b> |

**Notes:**

- <sup>1</sup> During dryer bypass emissions are not controlled by the WESP and RTO; however, combustion in the furnace still results in a reduction in organic HAP emission rates.
- Organic HAP emissions rates were derived based on stack testing data from Cottondale and other similar Enviva plants.
- Emission factors for wood combustion in a stoker boiler from AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03.

**Table 11b**  
**Potential Emissions - Dryer 2 Bypass (Full Capacity)<sup>1</sup>**  
**AA-011**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Abbreviations:**

CH<sub>4</sub> - methane  
CO - carbon monoxide  
CO<sub>2</sub> - carbon dioxide  
CO<sub>2</sub>e - carbon dioxide equivalent

HAP - hazardous air pollutant  
hr - hour  
kg - kilogram  
lb - pound  
MMBtu - Million British thermal units  
NO<sub>x</sub> - nitrogen oxides  
N<sub>2</sub>O - nitrous oxide

ODT - oven dried tons  
PM - particulate matter  
PM<sub>10</sub> - particulate matter with an aerodynamic diameter less than 10 microns  
PM<sub>2.5</sub> - particulate matter with an aerodynamic diameter of 2.5 microns or less  
RTO - regenerative thermal oxidizer  
SO<sub>2</sub> - sulfur dioxide  
tpy - tons per year  
VOC - volatile organic compound  
WESP - wet electrostatic precipitator  
yr - year

**Reference:**

AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03



**Table 11c**  
**Potential Emissions - Furnace 2 Bypass (Full Capacity)<sup>1</sup>**  
**AA-012**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Calculation Basis**

|                                 |                |
|---------------------------------|----------------|
| Hourly Throughput               | 42 ODT/hr      |
| Hourly Heat Input Capacity      | 168 MMBtu/hr   |
| Annual Heat Input Capacity      | 8,400 MMBtu/yr |
| Hours of Operation <sup>1</sup> | 50 hr/yr       |

**Potential Criteria Pollutant and Greenhouse Gas Emissions - Furnace Bypass Full Capacity**

| Pollutant                                    | Controlled Emission Factor | Units                 | Potential Emissions |       |
|----------------------------------------------|----------------------------|-----------------------|---------------------|-------|
|                                              |                            |                       | (lb/hr)             | (tpy) |
| CO                                           | 0.60                       | lb/MMBtu <sup>2</sup> | 101                 | 2.52  |
| NO <sub>x</sub>                              | 0.22                       | lb/MMBtu <sup>2</sup> | 37.0                | 0.92  |
| SO <sub>2</sub>                              | 0.025                      | lb/MMBtu <sup>2</sup> | 4.20                | 0.11  |
| VOC                                          | 0.017                      | lb/MMBtu <sup>2</sup> | 2.86                | 0.071 |
| Total PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.56                       | lb/MMBtu <sup>3</sup> | 94.1                | 2.35  |
| CO <sub>2</sub>                              | 93.8                       | lb/MMBtu <sup>4</sup> | 34,741              | 869   |
| CH <sub>4</sub>                              | 0.0072                     | lb/MMBtu <sup>4</sup> | 2.67                | 0.067 |
| N <sub>2</sub> O                             | 0.0036                     | lb/MMBtu <sup>4</sup> | 1.33                | 0.033 |
| CO <sub>2</sub> e                            |                            |                       | 35,205              | 880   |

**Notes:**

- <sup>1</sup> During startup and shutdown (for temperature control) or malfunction, emissions will be vented out either the dryer bypass stacks or the furnace bypass stacks. Use of each bypass stack at full capacity will not exceed 50 hours per 12-month rolling period for each dryer line.
- <sup>2</sup> CO, NO<sub>x</sub>, SO<sub>2</sub>, and VOC emission rates based on AP-42, Chapter 1.6 - Wood Residue Combustion in Boilers, 09/03 for bark/bark and wet wood/wet wood-fired boilers. VOC emission factor excludes formaldehyde.
- <sup>3</sup> Emission factor based on vendor data.
- <sup>4</sup> Emission factors for biomass combustion from Table C-1 and C-2 of 40 CFR Part 98 and Global Warming Potentials from Table A-1.

**Table 11c**  
**Potential Emissions - Furnace 2 Bypass (Full Capacity)<sup>1</sup>**  
**AA-012**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Potential HAP Emissions - Furnace Bypass Full Capacity**

| Pollutant                                       | Emission Factor <sup>1</sup> | Units    | Potential Emissions |             |
|-------------------------------------------------|------------------------------|----------|---------------------|-------------|
|                                                 |                              |          | (lb/hr)             | (tpy)       |
| Acetaldehyde                                    | 8.30E-04                     | lb/MMBtu | 1.39E-01            | 3.49E-03    |
| Acrolein                                        | 4.00E-03                     | lb/MMBtu | 6.72E-01            | 1.68E-02    |
| Formaldehyde                                    | 4.40E-03                     | lb/MMBtu | 7.39E-01            | 1.85E-02    |
| Phenol                                          | 5.10E-05                     | lb/MMBtu | 8.57E-03            | 2.14E-04    |
| Propionaldehyde                                 | 6.10E-05                     | lb/MMBtu | 1.02E-02            | 2.56E-04    |
| Acetophenone                                    | 3.20E-09                     | lb/MMBtu | 5.38E-07            | 1.34E-08    |
| Antimony and compounds                          | 7.90E-06                     | lb/MMBtu | 1.33E-03            | 3.32E-05    |
| Arsenic and compounds                           | 2.20E-05                     | lb/MMBtu | 3.70E-03            | 9.24E-05    |
| Benzo(a)pyrene                                  | 2.60E-06                     | lb/MMBtu | 4.37E-04            | 1.09E-05    |
| Beryllium metal                                 | 1.10E-06                     | lb/MMBtu | 1.85E-04            | 4.62E-06    |
| Cadmium metal                                   | 4.10E-06                     | lb/MMBtu | 6.89E-04            | 1.72E-05    |
| Carbon tetrachloride                            | 4.50E-05                     | lb/MMBtu | 7.56E-03            | 1.89E-04    |
| Chlorine                                        | 7.90E-04                     | lb/MMBtu | 1.33E-01            | 3.32E-03    |
| Chlorobenzene                                   | 3.30E-05                     | lb/MMBtu | 5.54E-03            | 1.39E-04    |
| Chromium-Other compounds                        | 1.75E-05                     | lb/MMBtu | 2.94E-03            | 7.35E-05    |
| Cobalt compounds                                | 6.50E-06                     | lb/MMBtu | 1.09E-03            | 2.73E-05    |
| Dinitrophenol, 2,4-                             | 1.80E-07                     | lb/MMBtu | 3.02E-05            | 7.56E-07    |
| Di(2-ethylhexyl)phthalate                       | 4.70E-08                     | lb/MMBtu | 7.90E-06            | 1.97E-07    |
| Ethyl benzene                                   | 3.10E-05                     | lb/MMBtu | 5.21E-03            | 1.30E-04    |
| Dichloroethane, 1,2-                            | 2.90E-05                     | lb/MMBtu | 4.87E-03            | 1.22E-04    |
| Hydrochloric acid                               | 1.90E-02                     | lb/MMBtu | 3.19E+00            | 7.98E-02    |
| Lead and lead compounds                         | 4.80E-05                     | lb/MMBtu | 8.06E-03            | 2.02E-04    |
| Manganese and compounds                         | 1.60E-03                     | lb/MMBtu | 2.69E-01            | 6.72E-03    |
| Mercury                                         | 3.50E-06                     | lb/MMBtu | 5.88E-04            | 1.47E-05    |
| Methyl bromide                                  | 1.50E-05                     | lb/MMBtu | 2.52E-03            | 6.30E-05    |
| Methyl chloride                                 | 2.30E-05                     | lb/MMBtu | 3.86E-03            | 9.66E-05    |
| Trichloroethane, 1,1,1-                         | 3.10E-05                     | lb/MMBtu | 5.21E-03            | 1.30E-04    |
| Naphthalene                                     | 9.70E-05                     | lb/MMBtu | 1.63E-02            | 4.07E-04    |
| Nickel metal                                    | 3.30E-05                     | lb/MMBtu | 5.54E-03            | 1.39E-04    |
| Nitrophenol, 4-                                 | 1.10E-07                     | lb/MMBtu | 1.85E-05            | 4.62E-07    |
| Pentachlorophenol                               | 5.10E-08                     | lb/MMBtu | 8.57E-06            | 2.14E-07    |
| Perchloroethylene                               | 3.80E-05                     | lb/MMBtu | 6.38E-03            | 1.60E-04    |
| Phosphorus metal, yellow or white               | 2.70E-05                     | lb/MMBtu | 4.54E-03            | 1.13E-04    |
| Polychlorinated biphenyls                       | 8.15E-09                     | lb/MMBtu | 1.37E-06            | 3.42E-08    |
| Total PAH (POM)                                 | 1.25E-04                     | lb/MMBtu | 2.10E-02            | 5.25E-04    |
| Dichloropropane, 1,2-                           | 3.30E-05                     | lb/MMBtu | 5.54E-03            | 1.39E-04    |
| Selenium compounds                              | 2.80E-06                     | lb/MMBtu | 4.70E-04            | 1.18E-05    |
| Tetrachlorodibenzo-p-dioxin, 2,3,7,8-           | 8.60E-12                     | lb/MMBtu | 1.44E-09            | 3.61E-11    |
| Trichloroethylene                               | 3.00E-05                     | lb/MMBtu | 5.04E-03            | 1.26E-04    |
| Trichlorophenol, 2,4,6-                         | 2.20E-08                     | lb/MMBtu | 3.70E-06            | 9.24E-08    |
| Vinyl chloride                                  | 1.80E-05                     | lb/MMBtu | 3.02E-03            | 7.56E-05    |
| <b>Total HAP Emissions (Biomass Combustion)</b> |                              |          | <b>5.28</b>         | <b>0.13</b> |

**Notes:**

<sup>1</sup> Emission factors for wood combustion in a stoker boiler from AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03.

**Abbreviations:**

CH<sub>4</sub> - methane  
CO - carbon monoxide  
CO<sub>2</sub> - carbon dioxide  
CO<sub>2</sub>e - carbon dioxide equivalent  
HAP - hazardous air pollutant  
hr - hour  
lb - pound  
MMBtu - Million British thermal units  
NO<sub>x</sub> - nitrogen oxides

N<sub>2</sub>O - nitrous oxide  
ODT - oven dried tons  
PM - particulate matter  
PM<sub>10</sub> - particulate matter with an aerodynamic diameter less than 10 microns  
PM<sub>2.5</sub> - particulate matter with an aerodynamic diameter of 2.5 microns or less  
SO<sub>2</sub> - sulfur dioxide  
tpy - tons per year  
VOC - volatile organic compound  
yr - year

**Reference:**

AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03



**Table 11d**  
**Potential Emissions - Furnace 2 Bypass (Idle Mode)<sup>1</sup>**  
**AA-012**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Calculation Basis**

|                                 |                |
|---------------------------------|----------------|
| Hourly Throughput               | 42 ODT/hr      |
| Hourly Heat Input Capacity      | 5 MMBtu/hr     |
| Annual Heat Input Capacity      | 2,500 MMBtu/yr |
| Hours of Operation <sup>1</sup> | 500 hr/yr      |

**Potential Criteria Pollutant and Greenhouse Gas Emissions - Furnace Bypass "Idle Mode"**

| Pollutant               | Controlled Emission Factor | Units                 | Potential Emissions |       |
|-------------------------|----------------------------|-----------------------|---------------------|-------|
|                         |                            |                       | (lb/hr)             | (tpy) |
| CO                      | 0.60                       | lb/MMBtu <sup>2</sup> | 3.00                | 0.75  |
| NO <sub>x</sub>         | 0.22                       | lb/MMBtu <sup>2</sup> | 1.10                | 0.28  |
| SO <sub>2</sub>         | 0.025                      | lb/MMBtu <sup>2</sup> | 0.13                | 0.031 |
| VOC                     | 0.017                      | lb/MMBtu <sup>2</sup> | 0.085               | 0.021 |
| Total PM                | 0.56                       | lb/MMBtu <sup>3</sup> | 2.80                | 0.70  |
| Total PM <sub>10</sub>  | 0.52                       | lb/MMBtu <sup>2</sup> | 2.59                | 0.65  |
| Total PM <sub>2.5</sub> | 0.45                       | lb/MMBtu <sup>2</sup> | 2.24                | 0.56  |
| CO <sub>2</sub>         | 93.8                       | kg/MMBtu <sup>4</sup> | 1,034               | 258   |
| CH <sub>4</sub>         | 0.0072                     | kg/MMBtu <sup>4</sup> | 0.079               | 0.020 |
| N <sub>2</sub> O        | 0.0036                     | kg/MMBtu <sup>4</sup> | 0.040               | 0.010 |
| CO <sub>2</sub> e       |                            |                       | 1,048               | 262   |

**Notes:**

- <sup>1</sup> Idle mode is defined as operation at up to a maximum heat input rate of 5 MMBtu/hr.
- <sup>2</sup> CO, NO<sub>x</sub>, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and VOC emission rates based on AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03 for bark/bark and wet wood/wet wood-fired boilers. PM<sub>10</sub> and PM<sub>2.5</sub> factors equal to the sum of the filterable and condensable factors from Table 1.6-1. VOC emission factor excludes formaldehyde.
- <sup>3</sup> Emission factor based on vendor data.
- <sup>4</sup> Emission factors for biomass combustion from Table C-1 and C-2 of 40 CFR Part 98 and Global Warming Potentials from Table A-1.

**Table 11d**  
**Potential Emissions - Furnace 2 Bypass (Idle Mode)<sup>1</sup>**  
**AA-012**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Potential HAP Emissions - Furnace Bypass "Idle Mode"**

| Pollutant                                       | Emission Factor <sup>1</sup> | Units    | Potential Emissions |              |
|-------------------------------------------------|------------------------------|----------|---------------------|--------------|
|                                                 |                              |          | (lb/hr)             | (tpy)        |
| Acetaldehyde                                    | 8.30E-04                     | lb/MMBtu | 4.15E-03            | 1.04E-03     |
| Acrolein                                        | 4.00E-03                     | lb/MMBtu | 2.00E-02            | 5.00E-03     |
| Formaldehyde                                    | 4.40E-03                     | lb/MMBtu | 2.20E-02            | 5.50E-03     |
| Phenol                                          | 5.10E-05                     | lb/MMBtu | 2.55E-04            | 6.38E-05     |
| Propionaldehyde                                 | 6.10E-05                     | lb/MMBtu | 3.05E-04            | 7.63E-05     |
| Acetophenone                                    | 3.20E-09                     | lb/MMBtu | 1.60E-08            | 4.00E-09     |
| Antimony and compounds                          | 7.90E-06                     | lb/MMBtu | 3.95E-05            | 9.88E-06     |
| Arsenic and compounds                           | 2.20E-05                     | lb/MMBtu | 1.10E-04            | 2.75E-05     |
| Benzo(a)pyrene                                  | 2.60E-06                     | lb/MMBtu | 1.30E-05            | 3.25E-06     |
| Beryllium metal                                 | 1.10E-06                     | lb/MMBtu | 5.50E-06            | 1.38E-06     |
| Cadmium metal                                   | 4.10E-06                     | lb/MMBtu | 2.05E-05            | 5.13E-06     |
| Carbon tetrachloride                            | 4.50E-05                     | lb/MMBtu | 2.25E-04            | 5.63E-05     |
| Chlorine                                        | 7.90E-04                     | lb/MMBtu | 3.95E-03            | 9.88E-04     |
| Chlorobenzene                                   | 3.30E-05                     | lb/MMBtu | 1.65E-04            | 4.13E-05     |
| Chromium-Other compounds                        | 2.10E-05                     | lb/MMBtu | 1.05E-04            | 2.63E-05     |
| Cobalt compounds                                | 6.50E-06                     | lb/MMBtu | 3.25E-05            | 8.13E-06     |
| Dinitrophenol, 2,4-                             | 1.80E-07                     | lb/MMBtu | 9.00E-07            | 2.25E-07     |
| Di(2-ethylhexyl)phthalate                       | 4.70E-08                     | lb/MMBtu | 2.35E-07            | 5.88E-08     |
| Ethyl benzene                                   | 3.10E-05                     | lb/MMBtu | 1.55E-04            | 3.88E-05     |
| Dichloroethane, 1,2-                            | 2.90E-05                     | lb/MMBtu | 1.45E-04            | 3.63E-05     |
| Hydrochloric acid                               | 1.90E-02                     | lb/MMBtu | 9.50E-02            | 2.38E-02     |
| Lead and lead compounds                         | 4.80E-05                     | lb/MMBtu | 2.40E-04            | 6.00E-05     |
| Manganese and compounds                         | 1.60E-03                     | lb/MMBtu | 8.00E-03            | 2.00E-03     |
| Mercury                                         | 3.50E-06                     | lb/MMBtu | 1.75E-05            | 4.38E-06     |
| Methyl bromide                                  | 1.50E-05                     | lb/MMBtu | 7.50E-05            | 1.88E-05     |
| Methyl chloride                                 | 2.30E-05                     | lb/MMBtu | 1.15E-04            | 2.88E-05     |
| Trichloroethane, 1,1,1-                         | 3.10E-05                     | lb/MMBtu | 1.55E-04            | 3.88E-05     |
| Naphthalene                                     | 9.70E-05                     | lb/MMBtu | 4.85E-04            | 1.21E-04     |
| Nickel metal                                    | 3.30E-05                     | lb/MMBtu | 1.65E-04            | 4.13E-05     |
| Nitrophenol, 4-                                 | 1.10E-07                     | lb/MMBtu | 5.50E-07            | 1.38E-07     |
| Pentachlorophenol                               | 5.10E-08                     | lb/MMBtu | 2.55E-07            | 6.38E-08     |
| Perchloroethylene                               | 3.80E-05                     | lb/MMBtu | 1.90E-04            | 4.75E-05     |
| Phosphorus metal, yellow or white               | 2.70E-05                     | lb/MMBtu | 1.35E-04            | 3.38E-05     |
| Polychlorinated biphenyls                       | 8.15E-09                     | lb/MMBtu | 4.08E-08            | 1.02E-08     |
| Total PAH (POM)                                 | 1.25E-04                     | lb/MMBtu | 6.25E-04            | 1.56E-04     |
| Dichloropropane, 1,2-                           | 3.30E-05                     | lb/MMBtu | 1.65E-04            | 4.13E-05     |
| Selenium compounds                              | 2.80E-06                     | lb/MMBtu | 1.40E-05            | 3.50E-06     |
| Tetrachlorodibenzo-p-dioxin, 2,3,7,8-           | 8.60E-12                     | lb/MMBtu | 4.30E-11            | 1.08E-11     |
| Trichloroethylene                               | 3.00E-05                     | lb/MMBtu | 1.50E-04            | 3.75E-05     |
| Trichlorophenol, 2,4,6-                         | 2.20E-08                     | lb/MMBtu | 1.10E-07            | 2.75E-08     |
| Vinyl chloride                                  | 1.80E-05                     | lb/MMBtu | 9.00E-05            | 2.25E-05     |
| <b>Total HAP Emissions (Biomass Combustion)</b> |                              |          | <b>0.16</b>         | <b>0.039</b> |

**Notes:**

<sup>1</sup> Emission factors for wood combustion in a stoker boiler from AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03.

**Abbreviations:**

|                                               |                                                                                            |
|-----------------------------------------------|--------------------------------------------------------------------------------------------|
| CH <sub>4</sub> - methane                     | N <sub>2</sub> O - nitrous oxide                                                           |
| CO - carbon monoxide                          | ODT - oven dried tons                                                                      |
| CO <sub>2</sub> - carbon dioxide              | PM - particulate matter                                                                    |
| CO <sub>2</sub> e - carbon dioxide equivalent | PM <sub>10</sub> - particulate matter with an aerodynamic diameter less than 10 microns    |
| HAP - hazardous air pollutant                 | PM <sub>2.5</sub> - particulate matter with an aerodynamic diameter of 2.5 microns or less |
| hr - hour                                     | SO <sub>2</sub> - sulfur dioxide                                                           |
| kg - kilogram                                 | tpy - tons per year                                                                        |
| lb - pound                                    | VOC - volatile organic compound                                                            |
| MMBtu - Million British thermal units         | yr - year                                                                                  |
| NO <sub>x</sub> - nitrogen oxides             |                                                                                            |

**Reference:**

AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03



**Table 12a**  
**Potential Emissions at Outlet of Dryer Line 3 RTO Stack**  
**AA-013**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Calculation Basis**

|                                                         |                                |
|---------------------------------------------------------|--------------------------------|
| Hourly Throughput (per line)                            | 42 ODT/hr                      |
| Annual Throughput (per line)                            | 367,920 ODT/yr                 |
| Hourly Heat Input Capacity (per furnace)                | 168 MMBtu/hr                   |
| Annual Heat Input Capacity (per furnace)                | 1,471,680 MMBtu/yr             |
| Hours of Operation                                      | 8,760 hr/yr                    |
| Number of RTO Burners (per RTO)                         | 2 burners                      |
| RTO Burner Rating                                       | 8 MMBtu/hr                     |
| Dryer Double Duct System - Num. of Burners <sup>1</sup> | 2 burners                      |
| Double Duct System Burner Rating <sup>1</sup>           | 1 MMBtu/hr                     |
| Propane Heating Value <sup>2</sup>                      | 91.5 MMBtu/Mgal                |
| Natural Gas Heating Value <sup>3</sup>                  | 1,020 Btu/scf                  |
| Hourly Fuel Consumption (total) <sup>4</sup>            | 0.022 Mgal/hr<br>propane       |
|                                                         | 0.0020 MMscf/hr<br>natural gas |
| RTO Control Efficiency <sup>5</sup>                     | 95%                            |

**Potential Criteria Pollutant and Greenhouse Gas Emissions**

| Pollutant                                                       | Controlled Emission Factor | Units                  | Potential Emissions from Dryer <sup>6</sup> |         |
|-----------------------------------------------------------------|----------------------------|------------------------|---------------------------------------------|---------|
|                                                                 |                            |                        | (lb/hr)                                     | (tpy)   |
| CO                                                              | 14.2                       | lb/hr <sup>7</sup>     | 14.2                                        | 62.2    |
| NO <sub>x</sub>                                                 | 17.0                       | lb/hr <sup>8</sup>     | 17.0                                        | 74.5    |
| SO <sub>2</sub>                                                 | 0.025                      | lb/MMBtu <sup>9</sup>  | 4.20                                        | 18.4    |
| VOC as Propane                                                  | 8.75                       | lb/hr <sup>7</sup>     | 8.75                                        | 38.3    |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> (Filterable)             | 4.69                       | lb/hr <sup>10</sup>    | 4.69                                        | 20.5    |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> (Condensable)            | 0.017                      | lb/MMBtu <sup>11</sup> | 2.86                                        | 12.5    |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> (Condensable - Nat. Gas) | 0.00056                    | lb/MMBtu <sup>12</sup> | 0.0089                                      | 0.039   |
| CO <sub>2</sub>                                                 | 780                        | lb/ODT <sup>13</sup>   | 32,760                                      | 143,489 |

**Notes:**

- <sup>1</sup> Each dryer system will include two (2) ducts (i.e., double ducts) that will each be heated by a 1 MMBtu/hr burner. There will be a total of six (6) burners, two (2) per dryer line. The burners will fire natural gas, with propane as a back-up, and will be low-NO<sub>x</sub> burners.
- <sup>2</sup> Propane heat content from AP-42 Section 1.5 - Liquefied Petroleum Gas Production, 7/08.
- <sup>3</sup> Natural gas heating value from AP-42 Section 1.4 - Natural Gas Combustion, 07/98.
- <sup>4</sup> Total hourly fuel consumption for both burners. The burners will fire natural gas, with propane as a back-up.
- <sup>5</sup> Control efficiency based on RTO vendor guarantee.
- <sup>6</sup> Exhaust from the dryers are routed to a WESP and then RTO for control of VOC, HAP, and particulates. Each of the three (3) dryer lines will have a dedicated WESP and RTO. Emissions for Dryer Lines 1 and 2 are calculated separately.
- <sup>7</sup> CO and VOC emission rates based on vendor data.
- <sup>8</sup> NO<sub>x</sub> emission factor based on stack testing at similar Enviva plants.
- <sup>9</sup> No emission factor is provided in AP-42, Section 10.6.2 for SO<sub>2</sub> for rotary dryers. Enviva has conservatively calculated SO<sub>2</sub> emissions based on AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03.
- <sup>10</sup> Filterable particulate emission rate based on RTO vendor data.
- <sup>11</sup> Condensable particulate emission factor for biomass combustion obtained from AP-42 Section 1.6.
- <sup>12</sup> Natural gas combustion by the RTO burners will also result in emissions of condensable PM. Emission factor obtained from AP-42, Section 1.4 - Natural Gas Combustion, 07/98.
- <sup>13</sup> Emission factor for CO<sub>2</sub> from AP-42, Section 10.6.1 for rotary dryer with RTO control device. Enviva has conservatively calculated the CO<sub>2</sub> emissions using the hardwood emission factor because the dryers at the Lucedale plant will use a combination of hardwood and softwood and the hardwood emission factor is greater than the softwood emission factor.

**Table 12a**  
**Potential Emissions at Outlet of Dryer Line 3 RTO Stack**  
**AA-013**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Potential Criteria Pollutant and Greenhouse Gas Emissions - Dryer System Double Duct Burners<sup>1</sup>**

| Pollutant                                          | Natural Gas Emission Factor <sup>2,3</sup><br>(lb/MMscf) | Potential Emissions - Natural Gas Combustion |        | Propane Emission Factor <sup>4,5,6</sup><br>(lb/Mgal) | Potential Emissions - Propane Combustion |        |
|----------------------------------------------------|----------------------------------------------------------|----------------------------------------------|--------|-------------------------------------------------------|------------------------------------------|--------|
|                                                    |                                                          | (lb/hr)                                      | (tpy)  |                                                       | (lb/hr)                                  | (tpy)  |
| CO                                                 | 84.0                                                     | 0.16                                         | 0.72   | 7.50                                                  | 0.16                                     | 0.72   |
| NO <sub>x</sub>                                    | 50.0                                                     | 0.10                                         | 0.43   | 6.50                                                  | 0.14                                     | 0.62   |
| SO <sub>2</sub>                                    | 0.60                                                     | 0.0012                                       | 0.0052 | 0.054                                                 | 0.0012                                   | 0.0052 |
| VOC                                                | 5.50                                                     | 5.39E-04                                     | 0.0024 | 1.00                                                  | 0.0011                                   | 0.0048 |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> Condensable | 5.70                                                     | 5.59E-04                                     | 0.0024 | 0.50                                                  | 5.46E-04                                 | 0.0024 |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> Filterable  | 1.90                                                     | 1.86E-04                                     | 0.0008 | 0.20                                                  | 2.19E-04                                 | 0.0010 |
| Total PM/PM <sub>10</sub> /PM <sub>2.5</sub>       | --                                                       | 7.45E-04                                     | 0.0033 | --                                                    | 7.65E-04                                 | 0.0034 |
| CO <sub>2</sub>                                    | 120,000                                                  | 235                                          | 1,031  | 12,500                                                | 273                                      | 1,197  |
| CH <sub>4</sub>                                    | 2.30                                                     | 0.0045                                       | 0.020  | 0.20                                                  | 0.0044                                   | 0.019  |
| N <sub>2</sub> O <sup>2</sup>                      | 0.64                                                     | 0.0013                                       | 0.0055 | 0.90                                                  | 0.020                                    | 0.0862 |
| CO <sub>2</sub> e                                  | --                                                       | 236                                          | 1,033  | --                                                    | 279                                      | 1,223  |

**Notes:**

- <sup>1</sup> Two (2) low-NO<sub>x</sub> burners will be used to heat the dryer system ducts to prevent condensation of wood tar from occurring and thus reduce the fire risk. The burners will combust natural gas. Emissions from the burners will be routed to the WESP and RTO on each dryer line; therefore, a 95% control efficiency was applied to VOC and PM/PM<sub>10</sub>/PM<sub>2.5</sub>.
- <sup>2</sup> Emission factors for natural gas combustion from AP-42 Section 1.4 - Natural Gas Combustion, 07/98. Natural gas heating value of 1,020 Btu/scf assumed per AP-42.
- <sup>3</sup> Emission factors for NO<sub>x</sub> and N<sub>2</sub>O assume burners are low NO<sub>x</sub> burners, per email from Kai Simonsen (Enviva) on August 8, 2018.
- <sup>4</sup> Emission factors for propane combustion obtained from AP-42 Section 1.5 - Liquefied Petroleum Gas Combustion, 07/08.
- <sup>5</sup> AP-42 Section 1.5 does not include an emission factor for low NO<sub>x</sub> burners. Per AP-42 Section 1.4, low NO<sub>x</sub> burners reduce NO<sub>x</sub> emissions by accomplishing combustion in stages, reducing NO<sub>x</sub> emissions 40 to 85% relative to uncontrolled emission levels. A conservative control efficiency of 50% was applied to the uncontrolled NO<sub>x</sub> emission factor from AP-42 Section 1.5. This reduction is consistent with the magnitude of reduction between the uncontrolled and low NO<sub>x</sub> emission factors in AP-42 Section 1.4.
- <sup>6</sup> SO<sub>2</sub> emissions are based on an assumed fuel sulfur content of 0.54 grains/100 ft<sup>3</sup> per A National Methodology and Emission Inventory for Residential Fuel Combustion.



**Table 12a**  
**Potential Emissions at Outlet of Dryer Line 3 RTO Stack**  
**AA-013**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Potential HAP Emissions**

| Pollutant                                | VOC | Emission Factor | Units    | Footnote | Potential Emissions |          |
|------------------------------------------|-----|-----------------|----------|----------|---------------------|----------|
|                                          |     |                 |          |          | (lb/hr)             | (tpy)    |
| Furnace - Biomass Combustion             |     |                 |          |          |                     |          |
| Acetaldehyde                             | Y   | 4.88E-03        | lb/ODT   | 1        | 0.20                | 0.90     |
| Acrolein                                 | Y   | 2.43E-03        | lb/ODT   | 1        | 0.10                | 0.45     |
| Formaldehyde                             | Y   | 2.84E-03        | lb/ODT   | 1        | 0.12                | 0.52     |
| Methanol                                 | Y   | 4.24E-03        | lb/ODT   | 1        | 0.18                | 0.78     |
| Phenol                                   | Y   | 3.84E-03        | lb/ODT   | 1        | 0.16                | 0.71     |
| Propionaldehyde                          | Y   | 1.39E-03        | lb/ODT   | 1        | 0.058               | 0.26     |
| Acetophenone                             | Y   | 3.20E-09        | lb/MMBtu | 1        | 2.69E-08            | 1.18E-07 |
| Antimony and compounds                   | N   | 7.90E-06        | lb/MMBtu | 2,4      | 6.64E-05            | 2.91E-04 |
| Arsenic and compounds                    | N   | 2.20E-05        | lb/MMBtu | 2,4      | 1.85E-04            | 8.09E-04 |
| Benzene                                  | Y   | 4.20E-03        | lb/MMBtu | 2,3      | 0.035               | 0.15     |
| Benzo(a)pyrene                           | Y   | 2.60E-06        | lb/MMBtu | 2,3      | 2.18E-05            | 9.57E-05 |
| Beryllium metal                          | N   | 1.10E-06        | lb/MMBtu | 2,4      | 9.24E-06            | 4.05E-05 |
| Cadmium metal                            | N   | 4.10E-06        | lb/MMBtu | 2,4      | 3.44E-05            | 1.51E-04 |
| Carbon tetrachloride                     | Y   | 4.50E-05        | lb/MMBtu | 2,3      | 3.78E-04            | 1.66E-03 |
| Chlorine                                 | N   | 7.90E-04        | lb/MMBtu | 2        | 0.13                | 0.58     |
| Chlorobenzene                            | Y   | 3.30E-05        | lb/MMBtu | 2,3      | 2.77E-04            | 1.21E-03 |
| Chloroform                               | Y   | 2.80E-05        | lb/MMBtu | 2,3      | 2.35E-04            | 1.03E-03 |
| Chromium-Other compounds                 | N   | 1.75E-05        | lb/MMBtu | 2,4      | 1.47E-04            | 6.44E-04 |
| Cobalt compounds                         | N   | 6.50E-06        | lb/MMBtu | 2,4      | 5.46E-05            | 2.39E-04 |
| Dichloroethane, 1,2-                     | Y   | 2.90E-05        | lb/MMBtu | 2,3      | 2.44E-04            | 1.07E-03 |
| Dichloropropane, 1,2-                    | Y   | 3.30E-05        | lb/MMBtu | 2,3      | 2.77E-04            | 1.21E-03 |
| Dinitrophenol, 2,4-                      | Y   | 1.80E-07        | lb/MMBtu | 2,3      | 1.51E-06            | 6.62E-06 |
| Di(2-ethylhexyl)phthalate                | Y   | 4.70E-08        | lb/MMBtu | 2,3      | 3.95E-07            | 1.73E-06 |
| Ethyl benzene                            | Y   | 3.10E-05        | lb/MMBtu | 2,3      | 2.60E-04            | 1.14E-03 |
| Hydrochloric acid                        | N   | 1.90E-02        | lb/MMBtu | 2,5      | 0.32                | 1.40     |
| Lead and lead compounds                  | N   | 4.80E-05        | lb/MMBtu | 2,4      | 4.03E-04            | 1.77E-03 |
| Manganese and compounds                  | N   | 1.60E-03        | lb/MMBtu | 2,4      | 0.013               | 0.059    |
| Mercury                                  | N   | 3.50E-06        | lb/MMBtu | 2,4      | 2.94E-05            | 1.29E-04 |
| Methyl bromide                           | Y   | 1.50E-05        | lb/MMBtu | 2,3      | 1.26E-04            | 5.52E-04 |
| Methyl chloride                          | Y   | 2.30E-05        | lb/MMBtu | 2,3      | 1.93E-04            | 8.46E-04 |
| Methylene chloride                       | Y   | 2.90E-04        | lb/MMBtu | 2,3      | 0.0024              | 0.011    |
| Naphthalene                              | Y   | 9.70E-05        | lb/MMBtu | 2,3      | 8.15E-04            | 0.0036   |
| Nickel metal                             | N   | 3.30E-05        | lb/MMBtu | 2,4      | 2.77E-04            | 1.21E-03 |
| Nitrophenol, 4-                          | Y   | 1.10E-07        | lb/MMBtu | 2,3      | 9.24E-07            | 4.05E-06 |
| Pentachlorophenol                        | N   | 5.10E-08        | lb/MMBtu | 2        | 8.57E-06            | 3.75E-05 |
| Perchloroethylene                        | N   | 3.80E-05        | lb/MMBtu | 2        | 0.0064              | 0.028    |
| Phosphorus metal, yellow or white        | N   | 2.70E-05        | lb/MMBtu | 2,4      | 2.27E-04            | 9.93E-04 |
| Polychlorinated biphenyls                | Y   | 8.15E-09        | lb/MMBtu | 2,3      | 6.85E-08            | 3.00E-07 |
| Polycyclic Organic Matter                | N   | 1.25E-04        | lb/MMBtu | 2        | 0.021               | 0.092    |
| Selenium compounds                       | N   | 2.80E-06        | lb/MMBtu | 2,4      | 2.35E-05            | 1.03E-04 |
| Styrene                                  | Y   | 1.90E-03        | lb/MMBtu | 2,3      | 0.016               | 0.070    |
| Tetrachlorodibenzo-p-dioxin, 2,3,7,8-    | Y   | 8.60E-12        | lb/MMBtu | 2,3      | 7.22E-11            | 3.16E-10 |
| Toluene                                  | Y   | 3.00E-05        | lb/MMBtu | 2,3      | 2.52E-04            | 1.10E-03 |
| Trichloroethane, 1,1,1-                  | N   | 3.10E-05        | lb/MMBtu | 2        | 5.21E-03            | 0.023    |
| Trichloroethylene                        | Y   | 3.00E-05        | lb/MMBtu | 2,3      | 2.52E-04            | 1.10E-03 |
| Trichlorophenol, 2,4,6-                  | Y   | 2.20E-08        | lb/MMBtu | 2,3      | 1.85E-07            | 8.09E-07 |
| Vinyl chloride                           | Y   | 1.80E-05        | lb/MMBtu | 2,3      | 1.51E-04            | 6.62E-04 |
| Xylene                                   | Y   | 2.50E-05        | lb/MMBtu | 2,3      | 2.10E-04            | 9.20E-04 |
| Total HAP Emissions (biomass combustion) |     |                 |          |          | 1.38                | 6.05     |



**Table 12a**  
**Potential Emissions at Outlet of Dryer Line 3 RTO Stack**  
**AA-013**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Potential HAP Emissions**

| Pollutant                                                                 | VOC | Emission Factor <sup>6</sup> | Units    | RTO Burners Potential Emissions |          | Double Duct Burners Potential Emissions <sup>3,4</sup> |          |
|---------------------------------------------------------------------------|-----|------------------------------|----------|---------------------------------|----------|--------------------------------------------------------|----------|
|                                                                           |     |                              |          | (lb/hr)                         | (tpy)    | (lb/hr)                                                | (tpy)    |
| RTO Burners and Dryer System Double Duct Burners - Natural Gas Combustion |     |                              |          |                                 |          |                                                        |          |
| 2-Methylnaphthalene                                                       | Y   | 2.40E-05                     | lb/MMscf | 3.76E-07                        | 1.65E-06 | 2.35E-09                                               | 1.03E-08 |
| 3-Methylchloranthrene                                                     | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| 7,12-Dimethylbenz(a)anthracene                                            | Y   | 1.60E-05                     | lb/MMscf | 2.51E-07                        | 1.10E-06 | 1.57E-09                                               | 6.87E-09 |
| Acenaphthene                                                              | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| Acenaphthylene                                                            | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| Anthracene                                                                | Y   | 2.40E-06                     | lb/MMscf | 3.76E-08                        | 1.65E-07 | 2.35E-10                                               | 1.03E-09 |
| Arsenic and compounds                                                     | N   | 2.00E-04                     | lb/MMscf | 3.14E-06                        | 1.37E-05 | 1.96E-08                                               | 8.59E-08 |
| Benz(a)anthracene                                                         | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| Benzene                                                                   | Y   | 2.10E-03                     | lb/MMscf | 3.29E-05                        | 1.44E-04 | 2.06E-07                                               | 9.02E-07 |
| Benzo(a)pyrene                                                            | Y   | 1.20E-06                     | lb/MMscf | 1.88E-08                        | 8.24E-08 | 1.18E-10                                               | 5.15E-10 |
| Benzo(b)fluoranthene                                                      | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| Benzo(g,h,i)perylene                                                      | Y   | 1.20E-06                     | lb/MMscf | 1.88E-08                        | 8.24E-08 | 1.18E-10                                               | 5.15E-10 |
| Benzo(k)fluoranthene                                                      | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| Beryllium metal                                                           | N   | 1.20E-05                     | lb/MMscf | 1.88E-07                        | 8.24E-07 | 1.18E-09                                               | 5.15E-09 |
| Cadmium metal                                                             | N   | 1.10E-03                     | lb/MMscf | 1.73E-05                        | 7.56E-05 | 1.08E-07                                               | 4.72E-07 |
| Chromium VI                                                               | N   | 1.40E-03                     | lb/MMscf | 2.20E-05                        | 9.62E-05 | 1.37E-07                                               | 6.01E-07 |
| Chrysene                                                                  | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| Cobalt compounds                                                          | N   | 8.40E-05                     | lb/MMscf | 1.32E-06                        | 5.77E-06 | 8.24E-09                                               | 3.61E-08 |
| Dibenzo(a,h)anthracene                                                    | Y   | 1.20E-06                     | lb/MMscf | 1.88E-08                        | 8.24E-08 | 1.18E-10                                               | 5.15E-10 |
| Dichlorobenzene                                                           | Y   | 1.20E-03                     | lb/MMscf | 1.88E-05                        | 8.24E-05 | 1.18E-07                                               | 5.15E-07 |
| Fluoranthene                                                              | Y   | 3.00E-06                     | lb/MMscf | 4.71E-08                        | 2.06E-07 | 2.94E-10                                               | 1.29E-09 |
| Fluorene                                                                  | Y   | 2.80E-06                     | lb/MMscf | 4.39E-08                        | 1.92E-07 | 2.75E-10                                               | 1.20E-09 |
| Formaldehyde                                                              | Y   | 0.075                        | lb/MMscf | 0.0012                          | 0.0052   | 7.35E-06                                               | 3.22E-05 |
| Hexane                                                                    | Y   | 1.80                         | lb/MMscf | 0.028                           | 0.12     | 1.76E-04                                               | 7.73E-04 |
| Indeno(1,2,3-cd)pyrene                                                    | Y   | 1.80E-06                     | lb/MMscf | 2.82E-08                        | 1.24E-07 | 1.76E-10                                               | 7.73E-10 |
| Lead and lead compounds                                                   | N   | 5.00E-04                     | lb/MMscf | 7.84E-06                        | 3.44E-05 | 4.90E-08                                               | 2.15E-07 |
| Manganese and compounds                                                   | N   | 3.80E-04                     | lb/MMscf | 5.96E-06                        | 2.61E-05 | 3.73E-08                                               | 1.63E-07 |
| Mercury                                                                   | N   | 2.60E-04                     | lb/MMscf | 4.08E-06                        | 1.79E-05 | 2.55E-08                                               | 1.12E-07 |
| Naphthalene                                                               | Y   | 6.10E-04                     | lb/MMscf | 9.57E-06                        | 4.19E-05 | 5.98E-08                                               | 2.62E-07 |
| Nickel metal                                                              | N   | 2.10E-03                     | lb/MMscf | 3.29E-05                        | 1.44E-04 | 2.06E-07                                               | 9.02E-07 |
| Phenanthrene                                                              | Y   | 1.70E-05                     | lb/MMscf | 2.67E-07                        | 1.17E-06 | 1.67E-09                                               | 7.30E-09 |
| Pyrene                                                                    | Y   | 5.00E-06                     | lb/MMscf | 7.84E-08                        | 3.44E-07 | 4.90E-10                                               | 2.15E-09 |
| Selenium compounds                                                        | N   | 2.40E-05                     | lb/MMscf | 3.76E-07                        | 1.65E-06 | 2.35E-09                                               | 1.03E-08 |
| Toluene                                                                   | Y   | 3.40E-03                     | lb/MMscf | 5.33E-05                        | 2.34E-04 | 3.33E-07                                               | 1.46E-06 |
| Total HAP Emissions (Natural Gas Combustion) <sup>7</sup>                 |     |                              |          | 0.030                           | 0.13     | 1.85E-04                                               | 8.10E-04 |

**Table 12a**  
**Potential Emissions at Outlet of Dryer Line 3 RTO Stack**  
**AA-013**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Potential HAP Emissions**

| Potential HAP Emissions                               |     |                              |          |                                 |        |                                                        |          |
|-------------------------------------------------------|-----|------------------------------|----------|---------------------------------|--------|--------------------------------------------------------|----------|
| Pollutant                                             | VOC | Emission Factor <sup>a</sup> | Units    | RTO Burners Potential Emissions |        | Double Duct Burners Potential Emissions <sup>3,4</sup> |          |
|                                                       |     |                              |          | (lb/hr)                         | (tpy)  | (lb/hr)                                                | (tpy)    |
| RTO Burners - Propane Combustion                      |     |                              |          |                                 |        |                                                        |          |
| Benzene                                               | Y   | 7.10E-04                     | lb/MMBtu | 0.011                           | 0.050  | 7.10E-05                                               | 3.11E-05 |
| Formaldehyde                                          | Y   | 1.51E-03                     | lb/MMBtu | 0.024                           | 0.11   | 1.51E-04                                               | 6.61E-05 |
| PAHs                                                  | N   | 4.00E-05                     | lb/MMBtu | 6.40E-04                        | 0.0028 | 8.00E-05                                               | 7.01E-04 |
| Total HAP Emissions (Propane Combustion) <sup>7</sup> |     |                              |          | 0.036                           | 0.16   | 3.02E-04                                               | 7.98E-04 |

**Notes:**

- <sup>1</sup> Emission factor derived based on stack testing data from comparable Enviva facilities.
- <sup>2</sup> Emission factors for wood combustion in a stoker boiler from AP-42 Section 1.6 - Wood Residue Combustion in Boilers, 09/03.
- <sup>3</sup> A control efficiency of 95% for the RTOs is applied to all organic HAP for those emission factors that are not derived from Enviva stack test data.
- <sup>4</sup> A 95% control efficiency for the wet electrostatic precipitator (WESP) is applied to all metal HAP.
- <sup>5</sup> The WESP will employ a caustic solution in its operation in which hydrochloric acid will have high water solubility. This caustic solution will neutralize the acid and effectively control it by 90%, per conversation on October 18, 2011 with Steven A. Jaasund, P.E. of Lundberg Associates, a manufacturer of WESPs.
- <sup>6</sup> Emission factors for natural gas combustion from AP-42 Section 1.4 - Natural Gas Combustion, 07/98. Natural gas heating value of 1,020 Btu/scf assumed per AP-42.
- <sup>7</sup> The RTO burners and burners for the dryer system double ducts will fire natural gas with propane as a back-up; however, propane is worst-case for HAP emissions.
- <sup>8</sup> Emission factors for propane combustion from the South Coast Air Quality Management District's Air Emissions Reporting Tool for external combustion equipment fired with LPG.

**Abbreviations:**

|                                               |                                                                                            |
|-----------------------------------------------|--------------------------------------------------------------------------------------------|
| CAS - chemical abstract service               | N <sub>2</sub> O - nitrous oxide                                                           |
| CH <sub>4</sub> - methane                     | ODT - oven dried tons                                                                      |
| CO - carbon monoxide                          | PM - particulate matter                                                                    |
| CO <sub>2</sub> - carbon dioxide              | PM <sub>10</sub> - particulate matter with an aerodynamic diameter less than 10 microns    |
| CO <sub>2</sub> e - carbon dioxide equivalent | PM <sub>2.5</sub> - particulate matter with an aerodynamic diameter of 2.5 microns or less |
| HAP - hazardous air pollutant                 | RTO - regenerative thermal oxidizer                                                        |
| hr - hour                                     | SO <sub>2</sub> - sulfur dioxide                                                           |
| kg - kilogram                                 | tpy - tons per year                                                                        |
| lb - pound                                    | VOC - volatile organic compound                                                            |
| MMBtu - Million British thermal units         | WESP - wet electrostatic precipitator                                                      |
| NO <sub>x</sub> - nitrogen oxides             | yr - year                                                                                  |

**References:**

- AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03  
AP-42, Section 1.4 - Natural Gas Combustion, 07/98  
South Coast Air Quality Management District. AER Reporting tool. Emission factors available in the Help and Support Manual at: <http://www.aqmd.gov/home/rules-compliance/compliance/annual-emission-reporting>



**Table 12b**  
**Potential Emissions - Dryer 3 Bypass (Full Capacity)<sup>1</sup>**  
**AA-014**

**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Calculation Basis**

|                                 |                |
|---------------------------------|----------------|
| Hourly Throughput               | 42 ODT/hr      |
| Hourly Heat Input Capacity      | 168 MMBtu/hr   |
| Annual Heat Input Capacity      | 8,400 MMBtu/yr |
| Hours of Operation <sup>1</sup> | 50 hr/yr       |

**Potential Criteria Pollutant and Greenhouse Gas Emissions - Dryer Bypass Full Capacity**

| Pollutant                                          | Controlled Emission Factor | Units                 | Potential Emissions |       |
|----------------------------------------------------|----------------------------|-----------------------|---------------------|-------|
|                                                    |                            |                       | (lb/hr)             | (tpy) |
| CO                                                 | 21.4                       | lb/hr <sup>2</sup>    | 21.4                | 0.54  |
| NO <sub>x</sub>                                    | 26.3                       | lb/hr <sup>2</sup>    | 26.3                | 0.66  |
| SO <sub>2</sub>                                    | 0.025                      | lb/MMBtu <sup>3</sup> | 4.20                | 0.11  |
| VOC                                                | 14.0                       | lb/hr <sup>2</sup>    | 14.0                | 0.35  |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> Condensable | 0.017                      | lb/MMBtu <sup>4</sup> | 2.86                | 0.071 |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> Filterable  | 0.33                       | lb/MMBtu <sup>5</sup> | 55.4                | 1.39  |
| Total PM/PM <sub>10</sub> /PM <sub>2.5</sub>       |                            |                       | 58.3                | 1.46  |
| CO <sub>2</sub>                                    | 93.8                       | kg/MMBtu <sup>6</sup> | 34,741              | 869   |
| CH <sub>4</sub>                                    | 0.0072                     | kg/MMBtu <sup>6</sup> | 2.67                | 0.067 |
| N <sub>2</sub> O                                   | 0.0036                     | kg/MMBtu <sup>6</sup> | 1.33                | 0.033 |
| CO <sub>2</sub> e                                  |                            |                       | 35,205              | 880   |

**Notes:**

- <sup>1</sup> During startup and shutdown (for temperature control) or malfunction, emissions will be vented out either the dryer bypass stacks or the furnace bypass stacks. Use of each bypass stack at full capacity will not exceed 50 hours per 12-month rolling period for each dryer line.
- <sup>2</sup> CO, NO<sub>x</sub>, and VOC emission rates based on vendor data.
- <sup>3</sup> No emission factor is provided in AP-42, Section 10.6.2 for SO<sub>2</sub> for rotary dryers. Enviva has conservatively calculated SO<sub>2</sub> emissions based on AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03.
- <sup>4</sup> Emission factor for condensable PM based on AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03.
- <sup>5</sup> Uncontrolled filterable PM emission factor is based on testing at a comparable Enviva facility.
- <sup>6</sup> Emission factors for biomass combustion (dryer) from Table C-1 and C-2 of 40 CFR Part 98 and Global Warming Potentials from Table A-1.



**Table 12b**  
**Potential Emissions - Dryer 3 Bypass (Full Capacity)<sup>1</sup>**  
**AA-014**

Enviva Pellets Lucedale, LLC  
Lucedale, George County, Mississippi

**Potential HAP Emissions - Dryer Bypass Full Capacity**

| Pollutant                             | Emission Factor | Units    | Footnote | Potential Emissions <sup>1</sup> |             |
|---------------------------------------|-----------------|----------|----------|----------------------------------|-------------|
|                                       |                 |          |          | (lb/hr)                          | (tpy)       |
| Acetaldehyde                          | 0.10            | lb/ODT   | 2        | 4.10                             | 0.10        |
| Acrolein                              | 0.049           | lb/ODT   | 2        | 2.04                             | 0.051       |
| Formaldehyde                          | 0.057           | lb/ODT   | 2        | 2.39                             | 0.060       |
| Methanol                              | 0.085           | lb/ODT   | 2        | 3.56                             | 0.089       |
| Phenol                                | 0.077           | lb/ODT   | 2        | 3.23                             | 0.081       |
| Propionaldehyde                       | 0.028           | lb/ODT   | 2        | 1.16                             | 0.029       |
| Acetophenone                          | 3.2E-09         | lb/MMBtu | 3        | 5.38E-07                         | 1.34E-08    |
| Antimony and compounds                | 7.9E-06         | lb/MMBtu | 3        | 1.33E-03                         | 3.32E-05    |
| Arsenic and compounds                 | 2.2E-05         | lb/MMBtu | 3        | 3.70E-03                         | 9.24E-05    |
| Benzo(a)pyrene                        | 2.6E-06         | lb/MMBtu | 3        | 4.37E-04                         | 1.09E-05    |
| Beryllium metal                       | 1.1E-06         | lb/MMBtu | 3        | 1.85E-04                         | 4.62E-06    |
| Cadmium metal                         | 4.1E-06         | lb/MMBtu | 3        | 6.89E-04                         | 1.72E-05    |
| Carbon tetrachloride                  | 4.5E-05         | lb/MMBtu | 3        | 7.56E-03                         | 1.89E-04    |
| Chlorine                              | 7.9E-04         | lb/MMBtu | 3        | 0.13                             | 0.0033      |
| Chlorobenzene                         | 3.3E-05         | lb/MMBtu | 3        | 5.54E-03                         | 1.39E-04    |
| Chromium-Other compounds              | 1.8E-05         | lb/MMBtu | 3        | 2.94E-03                         | 7.35E-05    |
| Cobalt compounds                      | 6.5E-06         | lb/MMBtu | 3        | 1.09E-03                         | 2.73E-05    |
| Dinitrophenol, 2,4-                   | 1.8E-07         | lb/MMBtu | 3        | 3.02E-05                         | 7.56E-07    |
| Di(2-ethylhexyl)phthalate             | 4.7E-08         | lb/MMBtu | 3        | 7.90E-06                         | 1.97E-07    |
| Ethyl benzene                         | 3.1E-05         | lb/MMBtu | 3        | 5.21E-03                         | 1.30E-04    |
| Dichloroethane, 1,2-                  | 2.9E-05         | lb/MMBtu | 3        | 4.87E-03                         | 1.22E-04    |
| Hydrochloric acid                     | 1.9E-02         | lb/MMBtu | 3        | 3.19                             | 0.080       |
| Lead and lead compounds               | 4.8E-05         | lb/MMBtu | 3        | 8.06E-03                         | 2.02E-04    |
| Manganese and compounds               | 1.6E-03         | lb/MMBtu | 3        | 0.27                             | 0.0067      |
| Mercury                               | 3.5E-06         | lb/MMBtu | 3        | 5.88E-04                         | 1.47E-05    |
| Methyl bromide                        | 1.5E-05         | lb/MMBtu | 3        | 2.52E-03                         | 6.30E-05    |
| Methyl chloride                       | 2.3E-05         | lb/MMBtu | 3        | 3.86E-03                         | 9.66E-05    |
| Trichloroethane, 1,1,1-               | 3.1E-05         | lb/MMBtu | 3        | 5.21E-03                         | 1.30E-04    |
| Naphthalene                           | 9.7E-05         | lb/MMBtu | 3        | 0.016                            | 4.07E-04    |
| Nickel metal                          | 3.3E-05         | lb/MMBtu | 3        | 5.54E-03                         | 1.39E-04    |
| Nitrophenol, 4-                       | 1.1E-07         | lb/MMBtu | 3        | 1.85E-05                         | 4.62E-07    |
| Pentachlorophenol                     | 5.1E-08         | lb/MMBtu | 3        | 8.57E-06                         | 2.14E-07    |
| Perchloroethylene                     | 3.8E-05         | lb/MMBtu | 3        | 6.38E-03                         | 1.60E-04    |
| Phosphorus metal, yellow or white     | 2.7E-05         | lb/MMBtu | 3        | 4.54E-03                         | 1.13E-04    |
| Polychlorinated biphenyls             | 8.2E-09         | lb/MMBtu | 3        | 1.37E-06                         | 3.42E-08    |
| Total PAH (POM)                       | 1.3E-04         | lb/MMBtu | 3        | 2.10E-02                         | 5.25E-04    |
| Dichloropropane, 1,2-                 | 3.3E-05         | lb/MMBtu | 3        | 5.54E-03                         | 1.39E-04    |
| Selenium compounds                    | 2.8E-06         | lb/MMBtu | 3        | 4.70E-04                         | 1.18E-05    |
| Tetrachlorodibenzo-p-dioxin, 2,3,7,8- | 8.6E-12         | lb/MMBtu | 3        | 1.44E-09                         | 3.61E-11    |
| Trichloroethylene                     | 3.0E-05         | lb/MMBtu | 3        | 5.04E-03                         | 1.26E-04    |
| Trichlorophenol, 2,4,6-               | 2.2E-08         | lb/MMBtu | 3        | 3.70E-06                         | 9.24E-08    |
| Vinyl chloride                        | 1.8E-05         | lb/MMBtu | 3        | 3.02E-03                         | 7.56E-05    |
| <b>Total HAP Emissions</b>            |                 |          |          | <b>20.2</b>                      | <b>0.50</b> |

**Notes:**

- <sup>1</sup> During dryer bypass emissions are not controlled by the WESP and RTO; however, combustion in the furnace still results in a reduction in organic HAP emission rates.
- <sup>2</sup> Organic HAP emissions rates were derived based on stack testing data from Cottondale and other similar Enviva plants.
- <sup>3</sup> Emission factors for wood combustion in a stoker boiler from AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03.

**Table 12b**  
**Potential Emissions - Dryer 3 Bypass (Full Capacity)<sup>1</sup>**  
**AA-014**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Abbreviations:**

|                                               |                                                                                            |
|-----------------------------------------------|--------------------------------------------------------------------------------------------|
| CH <sub>4</sub> - methane                     | ODT - oven dried tons                                                                      |
| CO - carbon monoxide                          | PM - particulate matter                                                                    |
| CO <sub>2</sub> - carbon dioxide              | PM <sub>10</sub> - particulate matter with an aerodynamic diameter less than 10 microns    |
| CO <sub>2</sub> e - carbon dioxide equivalent | PM <sub>2.5</sub> - particulate matter with an aerodynamic diameter of 2.5 microns or less |
| HAP - hazardous air pollutant                 | RTO - regenerative thermal oxidizer                                                        |
| hr - hour                                     | SO <sub>2</sub> - sulfur dioxide                                                           |
| kg - kilogram                                 | tpy - tons per year                                                                        |
| lb - pound                                    | VOC - volatile organic compound                                                            |
| MMBtu - Million British thermal units         | WESP - wet electrostatic precipitator                                                      |
| NO <sub>x</sub> - nitrogen oxides             | yr - year                                                                                  |
| N <sub>2</sub> O - nitrous oxide              |                                                                                            |

**Reference:**

AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03

**Table 12c**  
**Potential Emissions - Furnace 3 Bypass (Full Capacity)<sup>1</sup>**  
**AA-015**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Calculation Basis**

|                                 |                |
|---------------------------------|----------------|
| Hourly Throughput               | 42 ODT/hr      |
| Hourly Heat Input Capacity      | 168 MMBtu/hr   |
| Annual Heat Input Capacity      | 8,400 MMBtu/yr |
| Hours of Operation <sup>1</sup> | 50 hr/yr       |

**Potential Criteria Pollutant and Greenhouse Gas Emissions - Furnace Bypass Full Capacity**

| Pollutant                                    | Controlled Emission Factor | Units                 | Potential Emissions |       |
|----------------------------------------------|----------------------------|-----------------------|---------------------|-------|
|                                              |                            |                       | (lb/hr)             | (tpy) |
| CO                                           | 0.60                       | lb/MMBtu <sup>2</sup> | 100.8               | 2.52  |
| NO <sub>x</sub>                              | 0.22                       | lb/MMBtu <sup>2</sup> | 36.96               | 0.92  |
| SO <sub>2</sub>                              | 0.025                      | lb/MMBtu <sup>2</sup> | 4.20                | 0.11  |
| VOC                                          | 0.017                      | lb/MMBtu <sup>2</sup> | 2.86                | 0.071 |
| Total PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 0.56                       | lb/MMBtu <sup>3</sup> | 94.1                | 2.35  |
| CO <sub>2</sub>                              | 93.8                       | lb/MMBtu <sup>4</sup> | 34,741              | 869   |
| CH <sub>4</sub>                              | 0.0072                     | lb/MMBtu <sup>4</sup> | 2.67                | 0.067 |
| N <sub>2</sub> O                             | 0.0036                     | lb/MMBtu <sup>4</sup> | 1.33                | 0.033 |
| CO <sub>2</sub> e                            |                            |                       | 35,205              | 880   |

**Notes:**

- <sup>1</sup> During startup and shutdown (for temperature control) or malfunction, emissions will be vented out either the dryer bypass stacks or the furnace bypass stacks. Use of each bypass stack at full capacity will not exceed 50 hours per 12-month rolling period for each dryer line.
- <sup>2</sup> CO, NO<sub>x</sub>, SO<sub>2</sub>, and VOC emission rates based on AP-42, Chapter 1.6 - Wood Residue Combustion in Boilers, 09/03 for bark/bark and wet wood/wet wood-fired boilers. VOC emission factor excludes formaldehyde.
- <sup>3</sup> Emission factor based on vendor data.
- <sup>4</sup> Emission factors for biomass combustion from Table C-1 and C-2 of 40 CFR Part 98 and Global Warming Potentials from Table A-1.



**Table 12c**  
**Potential Emissions - Furnace 3 Bypass (Full Capacity)<sup>1</sup>**  
**AA-015**

**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Potential HAP Emissions - Furnace Bypass Full Capacity**

| Pollutant                                       | Emission Factor <sup>1</sup> | Units    | Potential Emissions |             |
|-------------------------------------------------|------------------------------|----------|---------------------|-------------|
|                                                 |                              |          | (lb/hr)             | (tpy)       |
| Acetaldehyde                                    | 8.30E-04                     | lb/MMBtu | 1.39E-01            | 3.49E-03    |
| Acrolein                                        | 4.00E-03                     | lb/MMBtu | 6.72E-01            | 1.68E-02    |
| Formaldehyde                                    | 4.40E-03                     | lb/MMBtu | 7.39E-01            | 1.85E-02    |
| Phenol                                          | 5.10E-05                     | lb/MMBtu | 8.57E-03            | 2.14E-04    |
| Propionaldehyde                                 | 6.10E-05                     | lb/MMBtu | 1.02E-02            | 2.56E-04    |
| Acetophenone                                    | 3.20E-09                     | lb/MMBtu | 5.38E-07            | 1.34E-08    |
| Antimony and compounds                          | 7.90E-06                     | lb/MMBtu | 1.33E-03            | 3.32E-05    |
| Arsenic and compounds                           | 2.20E-05                     | lb/MMBtu | 3.70E-03            | 9.24E-05    |
| Benzo(a)pyrene                                  | 2.60E-06                     | lb/MMBtu | 4.37E-04            | 1.09E-05    |
| Beryllium metal                                 | 1.10E-06                     | lb/MMBtu | 1.85E-04            | 4.62E-06    |
| Cadmium metal                                   | 4.10E-06                     | lb/MMBtu | 6.89E-04            | 1.72E-05    |
| Carbon tetrachloride                            | 4.50E-05                     | lb/MMBtu | 7.56E-03            | 1.89E-04    |
| Chlorine                                        | 7.90E-04                     | lb/MMBtu | 1.33E-01            | 3.32E-03    |
| Chlorobenzene                                   | 3.30E-05                     | lb/MMBtu | 5.54E-03            | 1.39E-04    |
| Chromium-Other compounds                        | 1.75E-05                     | lb/MMBtu | 2.94E-03            | 7.35E-05    |
| Cobalt compounds                                | 6.50E-06                     | lb/MMBtu | 1.09E-03            | 2.73E-05    |
| Dinitrophenol, 2,4-                             | 1.80E-07                     | lb/MMBtu | 3.02E-05            | 7.56E-07    |
| Di(2-ethylhexyl)phthalate                       | 4.70E-08                     | lb/MMBtu | 7.90E-06            | 1.97E-07    |
| Ethyl benzene                                   | 3.10E-05                     | lb/MMBtu | 5.21E-03            | 1.30E-04    |
| Dichloroethane, 1,2-                            | 2.90E-05                     | lb/MMBtu | 4.87E-03            | 1.22E-04    |
| Hydrochloric acid                               | 1.90E-02                     | lb/MMBtu | 3.19E+00            | 7.98E-02    |
| Lead and lead compounds                         | 4.80E-05                     | lb/MMBtu | 8.06E-03            | 2.02E-04    |
| Manganese and compounds                         | 1.60E-03                     | lb/MMBtu | 2.69E-01            | 6.72E-03    |
| Mercury                                         | 3.50E-06                     | lb/MMBtu | 5.88E-04            | 1.47E-05    |
| Methyl bromide                                  | 1.50E-05                     | lb/MMBtu | 2.52E-03            | 6.30E-05    |
| Methyl chloride                                 | 2.30E-05                     | lb/MMBtu | 3.86E-03            | 9.66E-05    |
| Trichloroethane, 1,1,1-                         | 3.10E-05                     | lb/MMBtu | 5.21E-03            | 1.30E-04    |
| Naphthalene                                     | 9.70E-05                     | lb/MMBtu | 1.63E-02            | 4.07E-04    |
| Nickel metal                                    | 3.30E-05                     | lb/MMBtu | 5.54E-03            | 1.39E-04    |
| Nitrophenol, 4-                                 | 1.10E-07                     | lb/MMBtu | 1.85E-05            | 4.62E-07    |
| Pentachlorophenol                               | 5.10E-08                     | lb/MMBtu | 8.57E-06            | 2.14E-07    |
| Perchloroethylene                               | 3.80E-05                     | lb/MMBtu | 6.38E-03            | 1.60E-04    |
| Phosphorus metal, yellow or white               | 2.70E-05                     | lb/MMBtu | 4.54E-03            | 1.13E-04    |
| Polychlorinated biphenyls                       | 8.15E-09                     | lb/MMBtu | 1.37E-06            | 3.42E-08    |
| Total PAH (POM)                                 | 1.25E-04                     | lb/MMBtu | 2.10E-02            | 5.25E-04    |
| Dichloropropane, 1,2-                           | 3.30E-05                     | lb/MMBtu | 5.54E-03            | 1.39E-04    |
| Selenium compounds                              | 2.80E-06                     | lb/MMBtu | 4.70E-04            | 1.18E-05    |
| Tetrachlorodibenzo-p-dioxin, 2,3,7,8-           | 8.60E-12                     | lb/MMBtu | 1.44E-09            | 3.61E-11    |
| Trichloroethylene                               | 3.00E-05                     | lb/MMBtu | 5.04E-03            | 1.26E-04    |
| Trichlorophenol, 2,4,6-                         | 2.20E-08                     | lb/MMBtu | 3.70E-06            | 9.24E-08    |
| Vinyl chloride                                  | 1.80E-05                     | lb/MMBtu | 3.02E-03            | 7.56E-05    |
| <b>Total HAP Emissions (Biomass Combustion)</b> |                              |          | <b>5.28</b>         | <b>0.13</b> |

**Notes:**

<sup>1</sup> Emission factors for wood combustion in a stoker boiler from AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03.

**Abbreviations:**

CH<sub>4</sub> - methane  
CO - carbon monoxide  
CO<sub>2</sub> - carbon dioxide  
CO<sub>2</sub>e - carbon dioxide equivalent  
HAP - hazardous air pollutant  
hr - hour  
lb - pound  
MMBtu - Million British thermal units  
NO<sub>x</sub> - nitrogen oxides

N<sub>2</sub>O - nitrous oxide  
ODT - oven dried tons  
PM - particulate matter  
PM<sub>10</sub> - particulate matter with an aerodynamic diameter less than 10 microns  
PM<sub>2.5</sub> - particulate matter with an aerodynamic diameter of 2.5 microns or less  
SO<sub>2</sub> - sulfur dioxide  
tpy - tons per year  
VOC - volatile organic compound  
yr - year

**Reference:**

AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03

**Table 12d**  
**Potential Emissions - Furnace 2 Bypass (Idle Mode)<sup>1</sup>**  
**AA-015**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Calculation Basis**

|                                 |                |
|---------------------------------|----------------|
| Hourly Throughput               | 42 ODT/hr      |
| Hourly Heat Input Capacity      | 5 MMBtu/hr     |
| Annual Heat Input Capacity      | 2,500 MMBtu/yr |
| Hours of Operation <sup>1</sup> | 500 hr/yr      |

**Potential Criteria Pollutant and Greenhouse Gas Emissions - Furnace Bypass "Idle Mode"**

| Pollutant               | Controlled Emission Factor | Units                 | Potential Emissions |       |
|-------------------------|----------------------------|-----------------------|---------------------|-------|
|                         |                            |                       | (lb/hr)             | (tpy) |
| CO                      | 0.60                       | lb/MMBtu <sup>2</sup> | 3.00                | 0.75  |
| NO <sub>x</sub>         | 0.22                       | lb/MMBtu <sup>2</sup> | 1.10                | 0.28  |
| SO <sub>2</sub>         | 0.025                      | lb/MMBtu <sup>2</sup> | 0.13                | 0.031 |
| VOC                     | 0.017                      | lb/MMBtu <sup>2</sup> | 0.085               | 0.021 |
| Total PM                | 0.56                       | lb/MMBtu <sup>3</sup> | 2.80                | 0.70  |
| Total PM <sub>10</sub>  | 0.52                       | lb/MMBtu <sup>2</sup> | 2.59                | 0.65  |
| Total PM <sub>2.5</sub> | 0.45                       | lb/MMBtu <sup>2</sup> | 2.24                | 0.56  |
| CO <sub>2</sub>         | 93.8                       | kg/MMBtu <sup>4</sup> | 1,034               | 258   |
| CH <sub>4</sub>         | 0.0072                     | kg/MMBtu <sup>4</sup> | 0.079               | 0.020 |
| N <sub>2</sub> O        | 0.0036                     | kg/MMBtu <sup>4</sup> | 0.040               | 0.010 |
| CO <sub>2</sub> e       |                            |                       | 1,048               | 262   |

**Notes:**

- <sup>1</sup> Idle mode is defined as operation at up to a maximum heat input rate of 5 MMBtu/hr.
- <sup>2</sup> CO, NO<sub>x</sub>, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and VOC emission rates based on AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03 for bark/bark and wet wood/wet wood-fired boilers. PM<sub>10</sub> and PM<sub>2.5</sub> factors equal to the sum of the filterable and condensable factors from Table 1.6-1. VOC emission factor excludes formaldehyde.
- <sup>3</sup> Emission factor based on vendor data.
- <sup>4</sup> Emission factors for biomass combustion from Table C-1 and C-2 of 40 CFR Part 98 and Global Warming Potentials from Table A-1.



**Table 12d**  
**Potential Emissions - Furnace 2 Bypass (Idle Mode)<sup>1</sup>**  
**AA-015**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Potential HAP Emissions - Furnace Bypass "Idle Mode"**

| Pollutant                                       | Emission Factor | Units    | Potential Emissions |              |
|-------------------------------------------------|-----------------|----------|---------------------|--------------|
|                                                 |                 |          | (lb/hr)             | (tpy)        |
| Acetaldehyde                                    | 8.30E-04        | lb/MMBtu | 4.15E-03            | 1.04E-03     |
| Acrolein                                        | 4.00E-03        | lb/MMBtu | 2.00E-02            | 5.00E-03     |
| Formaldehyde                                    | 4.40E-03        | lb/MMBtu | 2.20E-02            | 5.50E-03     |
| Phenol                                          | 5.10E-05        | lb/MMBtu | 2.55E-04            | 6.38E-05     |
| Propionaldehyde                                 | 6.10E-05        | lb/MMBtu | 3.05E-04            | 7.63E-05     |
| Acetophenone                                    | 3.20E-09        | lb/MMBtu | 1.60E-08            | 4.00E-09     |
| Antimony and compounds                          | 7.90E-06        | lb/MMBtu | 3.95E-05            | 9.88E-06     |
| Arsenic and compounds                           | 2.20E-05        | lb/MMBtu | 1.10E-04            | 2.75E-05     |
| Benzo(a)pyrene                                  | 2.60E-06        | lb/MMBtu | 1.30E-05            | 3.25E-06     |
| Beryllium metal                                 | 1.10E-06        | lb/MMBtu | 5.50E-06            | 1.38E-06     |
| Cadmium metal                                   | 4.10E-06        | lb/MMBtu | 2.05E-05            | 5.13E-06     |
| Carbon tetrachloride                            | 4.50E-05        | lb/MMBtu | 2.25E-04            | 5.63E-05     |
| Chlorine                                        | 7.90E-04        | lb/MMBtu | 3.95E-03            | 9.88E-04     |
| Chlorobenzene                                   | 3.30E-05        | lb/MMBtu | 1.65E-04            | 4.13E-05     |
| Chromium-Other compounds                        | 2.10E-05        | lb/MMBtu | 1.05E-04            | 2.63E-05     |
| Cobalt compounds                                | 6.50E-06        | lb/MMBtu | 3.25E-05            | 8.13E-06     |
| Dinitrophenol, 2,4-                             | 1.80E-07        | lb/MMBtu | 9.00E-07            | 2.25E-07     |
| Di(2-ethylhexyl)phthalate                       | 4.70E-08        | lb/MMBtu | 2.35E-07            | 5.88E-08     |
| Ethyl benzene                                   | 3.10E-05        | lb/MMBtu | 1.55E-04            | 3.88E-05     |
| Dichloroethane, 1,2-                            | 2.90E-05        | lb/MMBtu | 1.45E-04            | 3.63E-05     |
| Hydrochloric acid                               | 1.90E-02        | lb/MMBtu | 9.50E-02            | 2.38E-02     |
| Lead and lead compounds                         | 4.80E-05        | lb/MMBtu | 2.40E-04            | 6.00E-05     |
| Manganese and compounds                         | 1.60E-03        | lb/MMBtu | 8.00E-03            | 2.00E-03     |
| Mercury                                         | 3.50E-06        | lb/MMBtu | 1.75E-05            | 4.38E-06     |
| Methyl bromide                                  | 1.50E-05        | lb/MMBtu | 7.50E-05            | 1.88E-05     |
| Methyl chloride                                 | 2.30E-05        | lb/MMBtu | 1.15E-04            | 2.88E-05     |
| Trichloroethane, 1,1,1-                         | 3.10E-05        | lb/MMBtu | 1.55E-04            | 3.88E-05     |
| Naphthalene                                     | 9.70E-05        | lb/MMBtu | 4.85E-04            | 1.21E-04     |
| Nickel metal                                    | 3.30E-05        | lb/MMBtu | 1.65E-04            | 4.13E-05     |
| Nitrophenol, 4-                                 | 1.10E-07        | lb/MMBtu | 5.50E-07            | 1.38E-07     |
| Pentachlorophenol                               | 5.10E-08        | lb/MMBtu | 2.55E-07            | 6.38E-08     |
| Perchloroethylene                               | 3.80E-05        | lb/MMBtu | 1.90E-04            | 4.75E-05     |
| Phosphorus metal, yellow or white               | 2.70E-05        | lb/MMBtu | 1.35E-04            | 3.38E-05     |
| Polychlorinated biphenyls                       | 8.15E-09        | lb/MMBtu | 4.08E-08            | 1.02E-08     |
| Total PAH (POM)                                 | 1.25E-04        | lb/MMBtu | 6.25E-04            | 1.56E-04     |
| Dichloropropane, 1,2-                           | 3.30E-05        | lb/MMBtu | 1.65E-04            | 4.13E-05     |
| Selenium compounds                              | 2.80E-06        | lb/MMBtu | 1.40E-05            | 3.50E-06     |
| Tetrachlorodibenzo-p-dioxin, 2,3,7,8-           | 8.60E-12        | lb/MMBtu | 4.30E-11            | 1.08E-11     |
| Trichloroethylene                               | 3.00E-05        | lb/MMBtu | 1.50E-04            | 3.75E-05     |
| Trichlorophenol, 2,4,6-                         | 2.20E-08        | lb/MMBtu | 1.10E-07            | 2.75E-08     |
| Vinyl chloride                                  | 1.80E-05        | lb/MMBtu | 9.00E-05            | 2.25E-05     |
| <b>Total HAP Emissions (Biomass Combustion)</b> |                 |          | <b>0.16</b>         | <b>0.039</b> |

**Notes:**

<sup>1</sup> Emission factors for wood combustion in a stoker boiler from AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03.

**Abbreviations:**

CH<sub>4</sub> - methane  
CO - carbon monoxide  
CO<sub>2</sub> - carbon dioxide  
CO<sub>2</sub>e - carbon dioxide equivalent  
HAP - hazardous air pollutant  
hr - hour  
kg - kilogram  
lb - pound  
MMBtu - Million British thermal units  
NO<sub>x</sub> - nitrogen oxides

N<sub>2</sub>O - nitrous oxide  
ODT - oven dried tons  
PM - particulate matter  
PM<sub>10</sub> - particulate matter with an aerodynamic diameter less than 10 microns  
PM<sub>2.5</sub> - particulate matter with an aerodynamic diameter of 2.5 microns or less  
SO<sub>2</sub> - sulfur dioxide  
tpy - tons per year  
VOC - volatile organic compound  
yr - year

**Reference:**

AP-42, Section 1.6 - Wood Residue Combustion in Boilers, 09/03

**Table 13**  
**Potential VOC and HAP Emissions at Outlet of RCO-1 Stack**  
**AA-016**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Calculation Basis**

|                                        |                 |
|----------------------------------------|-----------------|
| Hourly Throughput                      | 108 ODT/hr      |
| Annual Throughput                      | 947,026 ODT/yr  |
| Hours of Operation                     | 8,760 hr/yr     |
| Propane Heating Value <sup>1</sup>     | 91.5 MMBtu/Mgal |
| Natural Gas Heating Value <sup>2</sup> | 1,020 Btu/scf   |
| Number of Burners                      | 1 burners       |
| RCO Burner Rating                      | 9.8 MMBtu/hr    |
| RCO Control Efficiency <sup>3</sup>    | 96.3%           |

**Pellet Coolers, Pellet Mills, and Dry Hammermills Potential VOC and HAP Emissions**

| Pollutant                                                         | CAS No.  | Controlled Emission Factor <sup>4,5</sup> | Units  | Emissions at RCO Outlet <sup>6</sup> |             |
|-------------------------------------------------------------------|----------|-------------------------------------------|--------|--------------------------------------|-------------|
|                                                                   |          |                                           |        | (lb/hr)                              | (tpy)       |
| Acetaldehyde                                                      | 75-07-0  | 0.00065                                   | lb/ODT | 0.070                                | 0.31        |
| Acrolein                                                          | 107-02-8 | 0.0023                                    | lb/ODT | 0.24                                 | 1.07        |
| Formaldehyde                                                      | 50-00-0  | 0.0015                                    | lb/ODT | 0.16                                 | 0.69        |
| Methanol                                                          | 67-56-1  | 0.0092                                    | lb/ODT | 1.00                                 | 4.37        |
| Phenol                                                            | 108-95-2 | 0.0011                                    | lb/ODT | 0.12                                 | 0.51        |
| Propionaldehyde                                                   | 123-38-6 | 0.0011                                    | lb/ODT | 0.12                                 | 0.52        |
| <b>Total HAP Emissions</b>                                        |          |                                           |        | <b>1.70</b>                          | <b>7.47</b> |
| Total VOC as propane                                              | --       | 7.73                                      | lb/hr  | 7.73                                 | 33.9        |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> (Filterable + Condensable) |          | 2.13                                      | lb/hr  | 2.13                                 | 9.34        |

**Notes:**

- <sup>1</sup> Propane heat content from AP-42 Section 1.5 - Liquefied Petroleum Gas Production, 7/08.
- <sup>2</sup> Natural gas heating value from AP-42 Section 1.4 - Natural Gas Combustion, 07/98.
- <sup>3</sup> A 96.3% control efficiency for the RCO is applied to VOC and organic HAP emissions per vendor data provided by Kai Simonsen (Enviva) via email on June 26, 2018.
- <sup>4</sup> HAP emission factors were derived based on stack testing data from comparable Enviva facilities.
- <sup>5</sup> VOC emissions (as propane) and PM emissions based on vendor data.
- <sup>6</sup> Includes emissions at outlet of the RCO-1 (AA-010) stack as well as emissions resulting from combustion of natural gas by the RCO-1 (AA-010) burners. RCO-1 (AA-010) will control emissions from thirty-two (32) dry hammermills, sixteen (16) pellet mills, and eight (8) pellet coolers.



**Table 13**  
**Potential VOC and HAP Emissions at Outlet of RCO-1 Stack**  
**AA-016**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Thermally Generated Potential Criteria Pollutant Emissions**

|                                                |                 |
|------------------------------------------------|-----------------|
| Maximum high heating value of VOC constituents | 0.018 MMBtu/lb  |
| Uncontrolled VOC emissions                     | 915 tons/yr     |
| Heat input of uncontrolled VOC emissions       | 33,864 MMBtu/yr |

| Pollutant       | Emission Factor | Units                 | Potential Emissions |       |
|-----------------|-----------------|-----------------------|---------------------|-------|
|                 |                 |                       | (lb/hr)             | (tpy) |
| CO              | 0.082           | lb/MMBtu <sup>1</sup> | 0.32                | 1.39  |
| NO <sub>x</sub> | 0.10            | lb/MMBtu <sup>1</sup> | 0.38                | 1.66  |

**Potential Criteria Pollutant and Greenhouse Gas Emissions - RCO Burners**

| Pollutant                                          | Emission Factor <sup>1</sup> | Units    | Potential Emissions |        |
|----------------------------------------------------|------------------------------|----------|---------------------|--------|
|                                                    |                              |          | (lb/hr)             | (tpy)  |
| RCO Burners - Natural Gas Combustion               |                              |          |                     |        |
| CO                                                 | 0.082                        | lb/MMBtu | 0.81                | 3.53   |
| NO <sub>x</sub> <sup>2</sup>                       | 1.00                         | lb/hr    | 1.00                | 4.38   |
| SO <sub>2</sub>                                    | 5.88E-04                     | lb/MMBtu | 0.0058              | 0.025  |
| VOC                                                | 5.39E-03                     | lb/MMBtu | 0.053               | 0.23   |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> Filterable  | 1.86E-03                     | lb/MMBtu | 0.018               | 0.080  |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> Condensable | 5.59E-03                     | lb/MMBtu | 0.055               | 0.24   |
| Total PM/PM <sub>10</sub> /PM <sub>2.5</sub>       |                              |          | 0.073               | 0.32   |
| CO <sub>2</sub>                                    | 66.9                         | kg/MMBtu | 1,445               | 6,329  |
| CH <sub>4</sub>                                    | 1.00E-03                     | kg/MMBtu | 0.022               | 0.095  |
| N <sub>2</sub> O                                   | 1.00E-04                     | kg/MMBtu | 0.0022              | 0.0095 |
| CO <sub>2</sub> e                                  |                              |          | 1,446               | 6,334  |

| Pollutant                                          | Emission Factor <sup>3</sup> | Units   | Potential Emissions |       |
|----------------------------------------------------|------------------------------|---------|---------------------|-------|
|                                                    |                              |         | (lb/hr)             | (tpy) |
| RCO Burners - Propane Combustion                   |                              |         |                     |       |
| CO                                                 | 7.50                         | lb/Mgal | 0.80                | 3.52  |
| NO <sub>x</sub>                                    | 6.50                         | lb/Mgal | 0.70                | 3.05  |
| SO <sub>2</sub> <sup>4</sup>                       | 0.054                        | lb/Mgal | 0.0058              | 0.025 |
| VOC                                                | 1.00                         | lb/Mgal | 0.11                | 0.47  |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> Condensable | 0.50                         | lb/Mgal | 0.054               | 0.23  |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> Filterable  | 0.20                         | lb/Mgal | 0.021               | 0.094 |
| Total PM/PM <sub>10</sub> /PM <sub>2.5</sub>       |                              |         | 0.075               | 0.33  |
| CO <sub>2</sub>                                    | 12,500                       | lb/Mgal | 1,339               | 5,864 |
| CH <sub>4</sub>                                    | 0.20                         | lb/Mgal | 0.021               | 0.094 |
| N <sub>2</sub> O                                   | 0.90                         | lb/Mgal | 0.10                | 0.42  |
| CO <sub>2</sub> e                                  |                              |         | 1,339               | 5,864 |

**Notes:**

- <sup>1</sup> Emission factors from AP-42, Section 1.4 - Natural Gas Combustion, 07/98. Emission factors converted from lb/MMscf to lb/MMBtu based on assumed heating value of 1,020 Btu/scf for natural gas per AP-42 Section 1.4.
- <sup>2</sup> NO<sub>x</sub> emissions from combustion of natural gas by the RCO burners are based on vendor data with additional contingency applied for conservatism.
- <sup>3</sup> Emission factors for propane combustion obtained from AP-42 Section 1.5 - Liquefied Petroleum Gas Combustion, 07/08.
- <sup>4</sup> SO<sub>2</sub> emissions are based on an assumed fuel sulfur content of 0.54 grains/100 ft<sup>3</sup> per *A National Methodology and Emission Inventory for Residential Fuel Combustion*.



**Table 13**  
**Potential VOC and HAP Emissions at Outlet of RCO-1 Stack**  
**AA-016**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Potential HAP Emissions - RCO Burners**

| Pollutant                                    | Emission Factor <sup>1</sup> | Units    | Potential Emissions |          |
|----------------------------------------------|------------------------------|----------|---------------------|----------|
|                                              |                              |          | (lb/hr)             | (tpy)    |
| RCO Burners - Natural Gas Combustion         |                              |          |                     |          |
| 2-Methylnaphthalene                          | 2.40E-05                     | lb/MMscf | 2.31E-07            | 1.01E-06 |
| 3-Methylchloranthrene                        | 1.80E-06                     | lb/MMscf | 1.73E-08            | 7.57E-08 |
| 7,12-Dimethylbenz(a)anthracene               | 1.60E-05                     | lb/MMscf | 1.54E-07            | 6.73E-07 |
| Acenaphthene                                 | 1.80E-06                     | lb/MMscf | 1.73E-08            | 7.57E-08 |
| Acenaphthylene                               | 1.80E-06                     | lb/MMscf | 1.73E-08            | 7.57E-08 |
| Acrolein                                     | 1.80E-05                     | lb/MMscf | 1.73E-07            | 7.57E-07 |
| Anthracene                                   | 2.40E-06                     | lb/MMscf | 2.31E-08            | 1.01E-07 |
| Arsenic                                      | 2.00E-04                     | lb/MMscf | 1.92E-06            | 8.42E-06 |
| Benz(a)anthracene                            | 1.80E-06                     | lb/MMscf | 1.73E-08            | 7.57E-08 |
| Benzene                                      | 2.10E-03                     | lb/MMscf | 2.02E-05            | 8.84E-05 |
| Benzo(a)pyrene                               | 1.20E-06                     | lb/MMscf | 1.15E-08            | 5.05E-08 |
| Benzo(b)fluoranthene                         | 1.80E-06                     | lb/MMscf | 1.73E-08            | 7.57E-08 |
| Benzo(g,h,i)perylene                         | 1.20E-06                     | lb/MMscf | 1.15E-08            | 5.05E-08 |
| Benzo(k)fluoranthene                         | 1.80E-06                     | lb/MMscf | 1.73E-08            | 7.57E-08 |
| Beryllium                                    | 1.20E-05                     | lb/MMscf | 1.15E-07            | 5.05E-07 |
| Cadmium                                      | 1.10E-03                     | lb/MMscf | 1.06E-05            | 4.63E-05 |
| Chromium VI                                  | 1.40E-03                     | lb/MMscf | 1.35E-05            | 5.89E-05 |
| Chrysene                                     | 1.80E-06                     | lb/MMscf | 1.73E-08            | 7.57E-08 |
| Cobalt                                       | 8.40E-05                     | lb/MMscf | 8.07E-07            | 3.53E-06 |
| Dibenzo(a,h)anthracene                       | 1.20E-06                     | lb/MMscf | 1.15E-08            | 5.05E-08 |
| Dichlorobenzene                              | 1.20E-03                     | lb/MMscf | 1.15E-05            | 5.05E-05 |
| Fluoranthene                                 | 3.00E-06                     | lb/MMscf | 2.88E-08            | 1.26E-07 |
| Fluorene                                     | 2.80E-06                     | lb/MMscf | 2.69E-08            | 1.18E-07 |
| Formaldehyde                                 | 7.50E-02                     | lb/MMscf | 7.21E-04            | 3.16E-03 |
| Hexane                                       | 1.8                          | lb/MMscf | 0.017               | 0.076    |
| Indeno(1,2,3-cd)pyrene                       | 1.80E-06                     | lb/MMscf | 1.73E-08            | 7.57E-08 |
| Lead                                         | 5.00E-04                     | lb/MMscf | 4.80E-06            | 2.10E-05 |
| Manganese                                    | 3.80E-04                     | lb/MMscf | 3.65E-06            | 1.60E-05 |
| Mercury                                      | 2.60E-04                     | lb/MMscf | 2.50E-06            | 1.09E-05 |
| Naphthalene                                  | 6.10E-04                     | lb/MMscf | 5.86E-06            | 2.57E-05 |
| Nickel                                       | 2.10E-03                     | lb/MMscf | 2.02E-05            | 8.84E-05 |
| Phenanathrene                                | 1.70E-05                     | lb/MMscf | 1.63E-07            | 7.15E-07 |
| Pyrene                                       | 5.00E-06                     | lb/MMscf | 4.80E-08            | 2.10E-07 |
| Selenium                                     | 2.40E-05                     | lb/MMscf | 2.31E-07            | 1.01E-06 |
| Toluene                                      | 3.40E-03                     | lb/MMscf | 3.27E-05            | 1.43E-04 |
| Total HAP Emissions (natural gas combustion) |                              |          | 0.018               | 0.079    |

**Table 13**  
**Potential VOC and HAP Emissions at Outlet of RCO-1 Stack**  
**AA-016**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

| Pollutant                                | Emission Factor <sup>2</sup> | Units    | Potential Emissions |          |
|------------------------------------------|------------------------------|----------|---------------------|----------|
|                                          |                              |          | (lb/hr)             | (tpy)    |
| RCO Burners - Propane Combustion         |                              |          |                     |          |
| Benzene                                  | 7.10E-04                     | lb/MMBtu | 6.96E-03            | 3.05E-02 |
| Formaldehyde                             | 1.51E-03                     | lb/MMBtu | 1.48E-02            | 6.48E-02 |
| PAHs                                     | 4.00E-05                     | lb/MMBtu | 3.92E-04            | 1.72E-03 |
| Total HAP Emissions (propane combustion) |                              |          | 0.022               | 0.097    |

**Notes:**

- <sup>1</sup> Emission factors from AP-42, Section 1.4 - Natural Gas Combustion, 07/98. Emission factors converted from lb/MMscf to lb/MMBtu based on assumed heating value of 1,020 Btu/scf for natural gas per AP-42 Section 1.4.
- <sup>2</sup> Emission factors for propane combustion from the South Coast Air Quality Management District's Air Emissions Reporting Tool for external combustion equipment fired with LPG.

**Abbreviations:**

CAS - chemical abstract service  
HAP - hazardous air pollutant  
hr - hour  
lb - pound  
ODT - oven dried tons

RCO - regenerative catalytic oxidizer  
RTO - regenerative thermal oxidizer  
tpy - tons per year  
VOC - volatile organic compound  
yr - year

**Reference:**

A National Methodology and Emission Inventory for Residential Fuel Combustion (2001). Retrieved from <https://www3.epa.gov/ttnchie1/conference/ei12/area/haneke.pdf>.  
AP-42, Section 1.4 - Natural Gas Combustion, 07/98.  
AP-42 Chapter 1.5, Liquid Petroleum Gas Combustion, 07/08.  
South Coast Air Quality Management District. AER Reporting tool. Emission factors available in the Help and Support Manual at: <http://www.aqmd.gov/home/rules-compliance/compliance/annual-emission-reporting>



**Table 14**  
**Potential VOC and HAP Emissions at Outlet of RCO-2 Stack**  
**AA-017**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Calculation Basis**

|                                        |                 |
|----------------------------------------|-----------------|
| Hourly Throughput                      | 54 ODT/hr       |
| Annual Throughput                      | 473,513 ODT/yr  |
| Hours of Operation                     | 8,760 hr/yr     |
| Propane Heating Value <sup>1</sup>     | 91.5 MMBtu/Mgal |
| Natural Gas Heating Value <sup>2</sup> | 1,020 Btu/scf   |
| Number of Burners                      | 1 burners       |
| RCO Burner Rating                      | 4.6 MMBtu/hr    |
| RCO Control Efficiency <sup>3</sup>    | 96.3%           |

**Pellet Coolers, Pellet Mills, and Dry Hammermills Potential VOC and HAP Emissions**

| Pollutant                                                         | CAS No.  | Controlled Emission Factor <sup>4,5</sup> | Units  | Emissions at RCO Outlet <sup>6</sup> |             |
|-------------------------------------------------------------------|----------|-------------------------------------------|--------|--------------------------------------|-------------|
|                                                                   |          |                                           |        | (lb/hr)                              | (tpy)       |
| Acetaldehyde                                                      | 75-07-0  | 0.00065                                   | lb/ODT | 0.035                                | 0.15        |
| Acrolein                                                          | 107-02-8 | 0.0023                                    | lb/ODT | 0.12                                 | 0.54        |
| Formaldehyde                                                      | 50-00-0  | 0.0015                                    | lb/ODT | 0.078                                | 0.34        |
| Methanol                                                          | 67-56-1  | 0.0092                                    | lb/ODT | 0.50                                 | 2.18        |
| Phenol                                                            | 108-95-2 | 0.0011                                    | lb/ODT | 0.059                                | 0.26        |
| Propionaldehyde                                                   | 123-38-6 | 0.0011                                    | lb/ODT | 0.059                                | 0.26        |
| <b>Total HAP Emissions</b>                                        |          |                                           |        | <b>0.85</b>                          | <b>3.73</b> |
| Total VOC as propane                                              | --       | 3.87                                      | lb/hr  | 3.87                                 | 16.9        |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> (Filterable + Condensable) |          | 1.07                                      | lb/hr  | 1.07                                 | 4.67        |

**Notes:**

- <sup>1</sup> Propane heat content from AP-42 Section 1.5 - Liquefied Petroleum Gas Production, 7/08.
- <sup>2</sup> Natural gas heating value from AP-42 Section 1.4 - Natural Gas Combustion, 07/98.
- <sup>3</sup> A 96.3% control efficiency for the RCO is applied to VOC and organic HAP emissions per vendor data provided by Kai Simonsen (Enviva) via email on June 26, 2018.
- <sup>4</sup> HAP emission factors were derived based on stack testing data from comparable Enviva facilities.
- <sup>5</sup> VOC emissions (as propane) and PM emissions based on vendor data.
- <sup>6</sup> Includes emissions at outlet of the RCO-2 (AA-011) stack as well as emissions resulting from combustion of natural gas by the RCO-2 (AA-011) burners. RCO-2 (AA-011) will control emissions from sixteen (16) dry hammermills, eight (8) pellet mills, and four (4) pellet coolers.

**Table 14**  
**Potential VOC and HAP Emissions at Outlet of RCO-2 Stack**  
**AA-017**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Thermally Generated Potential Criteria Pollutant Emissions**

|                                                |                 |
|------------------------------------------------|-----------------|
| Maximum high heating value of VOC constituents | 0.018 MMBtu/lb  |
| Uncontrolled VOC emissions                     | 458 tons/yr     |
| Heat input of uncontrolled VOC emissions       | 16,932 MMBtu/yr |

| Pollutant       | Emission Factor | Units                 | Potential Emissions |       |
|-----------------|-----------------|-----------------------|---------------------|-------|
|                 |                 |                       | (lb/hr)             | (tpy) |
| CO              | 0.082           | lb/MMBtu <sup>1</sup> | 0.16                | 0.70  |
| NO <sub>x</sub> | 0.10            | lb/MMBtu <sup>1</sup> | 0.19                | 0.83  |

**Potential Criteria Pollutant and Greenhouse Gas Emissions - RCO Burners**

| Pollutant                                          | Emission Factor | Units                 | Potential Emissions |        |
|----------------------------------------------------|-----------------|-----------------------|---------------------|--------|
|                                                    |                 |                       | (lb/hr)             | (tpy)  |
| RCO Burners - Natural Gas Combustion               |                 |                       |                     |        |
| CO                                                 | 0.082           | lb/MMBtu <sup>1</sup> | 0.38                | 1.66   |
| NO <sub>x</sub>                                    | 1.00            | lb/hr <sup>2</sup>    | 1.00                | 4.38   |
| SO <sub>2</sub>                                    | 5.9E-04         | lb/MMBtu <sup>1</sup> | 0.0027              | 0.012  |
| VOC                                                | 5.4E-03         | lb/MMBtu <sup>1</sup> | 0.025               | 0.11   |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> Filterable  | 1.9E-03         | lb/MMBtu <sup>1</sup> | 0.0086              | 0.038  |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> Condensable | 5.6E-03         | lb/MMBtu <sup>1</sup> | 0.026               | 0.11   |
| Total PM/PM <sub>10</sub> /PM <sub>2.5</sub>       |                 |                       | 0.034               | 0.15   |
| CO <sub>2</sub>                                    | 66.9            | kg/MMBtu <sup>3</sup> | 678                 | 2,971  |
| CH <sub>4</sub>                                    | 1.0E-03         | kg/MMBtu <sup>3</sup> | 0.010               | 0.044  |
| N <sub>2</sub> O                                   | 1.0E-04         | kg/MMBtu <sup>3</sup> | 0.0010              | 0.0044 |
| CO <sub>2</sub> e                                  |                 |                       | 679                 | 2,973  |

| Pollutant                                          | Emission Factor <sup>3</sup> | Units   | Potential Emissions |       |
|----------------------------------------------------|------------------------------|---------|---------------------|-------|
|                                                    |                              |         | (lb/hr)             | (tpy) |
| RCO Burners - Propane Combustion                   |                              |         |                     |       |
| CO                                                 | 7.50                         | lb/Mgal | 0.38                | 1.65  |
| NO <sub>x</sub>                                    | 6.50                         | lb/Mgal | 0.33                | 1.43  |
| SO <sub>2</sub> <sup>4</sup>                       | 0.054                        | lb/Mgal | 0.0027              | 0.012 |
| VOC                                                | 1.00                         | lb/Mgal | 0.050               | 0.22  |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> Condensable | 0.50                         | lb/Mgal | 0.025               | 0.11  |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> Filterable  | 0.20                         | lb/Mgal | 0.010               | 0.044 |
| Total PM/PM <sub>10</sub> /PM <sub>2.5</sub>       |                              |         | 0.035               | 0.15  |
| CO <sub>2</sub>                                    | 12,500                       | lb/Mgal | 628                 | 2,752 |
| CH <sub>4</sub>                                    | 0.20                         | lb/Mgal | 0.010               | 0.044 |
| N <sub>2</sub> O                                   | 0.90                         | lb/Mgal | 0.045               | 0.20  |
| CO <sub>2</sub> e                                  |                              |         | 628                 | 2,752 |

**Notes:**

- <sup>1</sup> Emission factors from AP-42, Section 1.4 - Natural Gas Combustion, 07/98. Emission factors converted from lb/MMscf to lb/MMBtu based on assumed heating value of 1,020 Btu/scf for natural gas per AP-42 Section 1.4.
- <sup>2</sup> NO<sub>x</sub> emissions from combustion of natural gas by the RCO burners are based on vendor data with additional contingency applied for conservatism.
- <sup>3</sup> Emission factors for propane combustion obtained from AP-42 Section 1.5 - Liquefied Petroleum Gas Combustion, 07/08.
- <sup>4</sup> SO<sub>2</sub> emissions are based on an assumed fuel sulfur content of 0.54 grains/100 ft<sup>3</sup> per A *National Methodology and Emission Inventory for Residential Fuel Combustion*.



**Table 14**  
**Potential VOC and HAP Emissions at Outlet of RCO-2 Stack**  
**AA-017**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Potential HAP Emissions - RCO Burners**

| Pollutant                                    | Emission Factor <sup>1</sup> | Units    | Potential Emissions |          |
|----------------------------------------------|------------------------------|----------|---------------------|----------|
|                                              |                              |          | (lb/hr)             | (tpy)    |
| RCO Burners - Natural Gas Combustion         |                              |          |                     |          |
| 2-Methylnaphthalene                          | 2.40E-05                     | lb/MMscf | 1.08E-07            | 4.74E-07 |
| 3-Methylchloranthrene                        | 1.80E-06                     | lb/MMscf | 8.12E-09            | 3.56E-08 |
| 7,12-Dimethylbenz(a)anthracene               | 1.60E-05                     | lb/MMscf | 7.22E-08            | 3.16E-07 |
| Acenaphthene                                 | 1.80E-06                     | lb/MMscf | 8.12E-09            | 3.56E-08 |
| Acenaphthylene                               | 1.80E-06                     | lb/MMscf | 8.12E-09            | 3.56E-08 |
| Acrolein                                     | 1.80E-05                     | lb/MMscf | 8.12E-08            | 3.56E-07 |
| Anthracene                                   | 2.40E-06                     | lb/MMscf | 1.08E-08            | 4.74E-08 |
| Arsenic                                      | 2.00E-04                     | lb/MMscf | 9.02E-07            | 3.95E-06 |
| Benz(a)anthracene                            | 1.80E-06                     | lb/MMscf | 8.12E-09            | 3.56E-08 |
| Benzene                                      | 2.10E-03                     | lb/MMscf | 9.47E-06            | 4.15E-05 |
| Benzo(a)pyrene                               | 1.20E-06                     | lb/MMscf | 5.41E-09            | 2.37E-08 |
| Benzo(b)fluoranthene                         | 1.80E-06                     | lb/MMscf | 8.12E-09            | 3.56E-08 |
| Benzo(g,h,i)perylene                         | 1.20E-06                     | lb/MMscf | 5.41E-09            | 2.37E-08 |
| Benzo(k)fluoranthene                         | 1.80E-06                     | lb/MMscf | 8.12E-09            | 3.56E-08 |
| Beryllium                                    | 1.20E-05                     | lb/MMscf | 5.41E-08            | 2.37E-07 |
| Cadmium                                      | 1.10E-03                     | lb/MMscf | 4.96E-06            | 2.17E-05 |
| Chromium VI                                  | 1.40E-03                     | lb/MMscf | 6.31E-06            | 2.77E-05 |
| Chrysene                                     | 1.80E-06                     | lb/MMscf | 8.12E-09            | 3.56E-08 |
| Cobalt                                       | 8.40E-05                     | lb/MMscf | 3.79E-07            | 1.66E-06 |
| Dibenzo(a,h)anthracene                       | 1.20E-06                     | lb/MMscf | 5.41E-09            | 2.37E-08 |
| Dichlorobenzene                              | 1.20E-03                     | lb/MMscf | 5.41E-06            | 2.37E-05 |
| Fluoranthene                                 | 3.00E-06                     | lb/MMscf | 1.35E-08            | 5.93E-08 |
| Fluorene                                     | 2.80E-06                     | lb/MMscf | 1.26E-08            | 5.53E-08 |
| Formaldehyde                                 | 7.50E-02                     | lb/MMscf | 3.38E-04            | 1.48E-03 |
| Hexane                                       | 1.8                          | lb/MMscf | 0.0081              | 0.036    |
| Indeno(1,2,3-cd)pyrene                       | 1.80E-06                     | lb/MMscf | 8.12E-09            | 3.56E-08 |
| Lead                                         | 5.00E-04                     | lb/MMscf | 2.25E-06            | 9.88E-06 |
| Manganese                                    | 3.80E-04                     | lb/MMscf | 1.71E-06            | 7.51E-06 |
| Mercury                                      | 2.60E-04                     | lb/MMscf | 1.17E-06            | 5.14E-06 |
| Naphthalene                                  | 6.10E-04                     | lb/MMscf | 2.75E-06            | 1.20E-05 |
| Nickel                                       | 2.10E-03                     | lb/MMscf | 9.47E-06            | 4.15E-05 |
| Phenanathrene                                | 1.70E-05                     | lb/MMscf | 7.67E-08            | 3.36E-07 |
| Pyrene                                       | 5.00E-06                     | lb/MMscf | 2.25E-08            | 9.88E-08 |
| Selenium                                     | 2.40E-05                     | lb/MMscf | 1.08E-07            | 4.74E-07 |
| Toluene                                      | 3.40E-03                     | lb/MMscf | 1.53E-05            | 6.72E-05 |
| Total HAP Emissions (natural gas combustion) |                              |          | 0.0085              | 0.037    |

**Table 14**  
**Potential VOC and HAP Emissions at Outlet of RCO-2 Stack**  
**AA-017**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

| Pollutant                                | Emission Factor <sup>2</sup> | Units    | Potential Emissions |          |
|------------------------------------------|------------------------------|----------|---------------------|----------|
|                                          |                              |          | (lb/hr)             | (tpy)    |
| RCO Burners - Propane Combustion         |                              |          |                     |          |
| Benzene                                  | 7.10E-04                     | lb/MMBtu | 3.27E-03            | 1.43E-02 |
| Formaldehyde                             | 1.51E-03                     | lb/MMBtu | 6.95E-03            | 3.04E-02 |
| PAHs                                     | 4.00E-05                     | lb/MMBtu | 1.84E-04            | 8.06E-04 |
| Total HAP Emissions (propane combustion) |                              |          | 0.010               | 0.046    |

**Notes:**

- <sup>1</sup> Emission factors from AP-42, Section 1.4 - Natural Gas Combustion, 07/98. Emission factors converted from lb/MMscf to lb/MMBtu based on assumed heating value of 1,020 Btu/scf for natural gas per AP-42 Section 1.4.
- <sup>2</sup> Emission factors for propane combustion from the South Coast Air Quality Management District's Air Emissions Reporting Tool for external combustion equipment fired with LPG.

**Abbreviations:**

|                                 |                                       |
|---------------------------------|---------------------------------------|
| CAS - chemical abstract service | RCO - regenerative catalytic oxidizer |
| HAP - hazardous air pollutant   | RTO - regenerative thermal oxidizer   |
| hr - hour                       | tpy - tons per year                   |
| lb - pound                      | VOC - volatile organic compound       |
| ODT - oven dried tons           | yr - year                             |

**Reference:**

A National Methodology and Emission Inventory for Residential Fuel Combustion (2001). Retrieved from <https://www3.epa.gov/ttnchie1/conference/ei12/area/haneke.pdf>.  
AP-42, Section 1.4 - Natural Gas Combustion, 07/98.  
AP-42 Chapter 1.5, Liquid Petroleum Gas Combustion, 07/08.  
South Coast Air Quality Management District. AER Reporting tool. Emission factors available in the Help and Support Manual at: <http://www.aqmd.gov/home/rules-compliance/compliance/annual-emission-reporting>

**Table 15**  
**Summary of Potential Emissions from Baghouses**  
**AA-018, AA-019, AA-020**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

| Emission Unit ID | Source Description            | Control Device Description    | Exhaust Flow Rate <sup>1</sup> | Exit Grain Loading | Particulate Speciation        |                                | Potential Emissions |       |                  |       |                   |        |
|------------------|-------------------------------|-------------------------------|--------------------------------|--------------------|-------------------------------|--------------------------------|---------------------|-------|------------------|-------|-------------------|--------|
|                  |                               |                               | (cfm)                          | (gr/cf)            | PM <sub>10</sub><br>(% of PM) | PM <sub>2.5</sub><br>(% of PM) | PM                  |       | PM <sub>10</sub> |       | PM <sub>2.5</sub> |        |
|                  |                               |                               |                                |                    |                               |                                | (lb/hr)             | (tpy) | (lb/hr)          | (tpy) | (lb/hr)           | (tpy)  |
| AA-018           | Finished Product Handling     | One (1) baghouse <sup>2</sup> | 3,000                          | 0.004              | 91%                           | 1.7%                           | 0.10                | 0.45  | 0.094            | 0.41  | 0.0017            | 0.0077 |
|                  | Two (2) Pellet Loadout Bins   |                               |                                |                    |                               |                                |                     |       |                  |       |                   |        |
| AA-019           | Additive Handling and Storage | One (1) baghouse <sup>3</sup> | 1,000                          | 0.004              | 100%                          | 100%                           | 0.034               | 0.15  | 0.034            | 0.15  | 0.034             | 0.15   |
| AA-020           | Dry Shavings Silo             | One (1) baghouse <sup>3</sup> | 1,000                          | 0.004              | 100%                          | 100%                           | 0.034               | 0.15  | 0.034            | 0.15  | 0.034             | 0.15   |

**Notes:**

<sup>1</sup> Control device flow rate (cfm) based on data provided by Kai Simonsen (Enviva) on June 25, 2018 and July 3, 2018.

<sup>2</sup> Finished product handling particulate speciation based on April 2014 testing conducted at Enviva's Southampton plant.

<sup>3</sup> No speciation data is available; therefore, all PM is conservatively assumed to be PM<sub>2.5</sub>.

**Abbreviations:**

cf - cubic feet  
cfm - cubic feet per minute  
gr - grain  
hr - hour  
lb - pound

PM - particulate matter  
PM<sub>10</sub> - particulate matter with an aerodynamic diameter less than 10 microns  
PM<sub>2.5</sub> - particulate matter with an aerodynamic diameter of 2.5 microns or less  
tpy - tons per year



**Table 16**  
**Emergency Generator Potential Emissions**  
**AA-022**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Calculation Basis**

|                         |                            |
|-------------------------|----------------------------|
| Engine Output           | 500 kW                     |
| Horsepower Rating       | 671 brake hp               |
| Diesel Heating Value    | 19,300 Btu/lb              |
| Hours of Operation      | 500 hr/yr                  |
| Conversion factor       | 2,545 Btu/hr/hp            |
| Hourly Fuel Consumption | 31.9 gal/hr <sup>1</sup>   |
| Energy Input            | 4.37 MMBtu/hr <sup>2</sup> |

**Notes:**

- <sup>1</sup> Fuel consumption calculated using a factor of 0.0476 gal/hr-hp. Advanced Environmental Interface, Inc. (1998). General Permits for Emergency Engines. INSIGHTS, 98-2, 3.
- <sup>2</sup> Energy calculated on a fuel consumption basis, using an energy factor of 0.137 MMBtu/gal.

**Potential Criteria Pollutant Emissions**

| Pollutant                      | Emission Factor | Units                 | Potential Emissions <sup>1</sup> |         |
|--------------------------------|-----------------|-----------------------|----------------------------------|---------|
|                                |                 |                       | (lb/hr)                          | (tpy)   |
| CO <sup>2</sup>                | 0.39            | g/hp-hr               | 0.58                             | 0.14    |
| NO <sub>x</sub> <sup>2</sup>   | 6.65            | g/hp-hr               | 9.83                             | 2.46    |
| SO <sub>2</sub> <sup>3</sup>   | 15              | ppmw                  | 0.0027                           | 0.00066 |
| VOC <sup>2</sup>               | 0.01            | lb/hp-hr              | 6.71                             | 1.68    |
| PM <sup>2</sup>                | 0.021           | g/hp-hr               | 0.031                            | 0.0078  |
| PM <sub>10</sub> <sup>2</sup>  | 0.021           | g/hp-hr               | 0.031                            | 0.0078  |
| PM <sub>2.5</sub> <sup>2</sup> | 0.021           | g/hp-hr               | 0.031                            | 0.0078  |
| CO <sub>2</sub>                | 74.0            | kg/MMBtu <sup>4</sup> | 713                              | 178     |
| CH <sub>4</sub>                | 3.0E-03         | kg/MMBtu <sup>4</sup> | 0.029                            | 0.0072  |
| N <sub>2</sub> O               | 6.0E-04         | kg/MMBtu <sup>4</sup> | 0.0058                           | 0.0014  |
| CO <sub>2</sub> e              |                 |                       | 715                              | 179     |

**Notes:**

- <sup>1</sup> NSPS allows for only 100 hrs/yr of non-emergency operation of these engines. Potential emissions for the emergency generator are conservatively based on 500 hr/yr.
- <sup>2</sup> Emission factors for Particulate Matter (TSP/PM<sub>10</sub>/PM<sub>2.5</sub>), Nitrous Oxide (NO<sub>x</sub>), Volatile Organic Matter (VOC), and Carbon Monoxide (CO) obtained from generator's spec sheet. The generator's spec sheet does not include an emission factor for VOC so the hydrocarbon (HC) emission factor was used as a surrogate for VOC.
- <sup>3</sup> Sulfur content in accordance with Year 2013 standards of 40 CFR 80.510(a) as required by NSPS Subpart IIII.
- <sup>4</sup> Emission factors from Table C-1 and C-2 of 40 CFR Part 98 and Global Warming Potentials from Table A-1.

**Potential HAP Emissions**

| Pollutant                   | CAS No.   | VOC | Emission Factor <sup>1</sup> | Potential Emissions <sup>2</sup> |                 |
|-----------------------------|-----------|-----|------------------------------|----------------------------------|-----------------|
|                             |           |     | (lb/MMBtu)                   | (lb/hr)                          | (tpy)           |
| Acetaldehyde                | 75-07-0   | Y   | 2.52E-05                     | 1.10E-04                         | 2.75E-05        |
| Acrolein                    | 107-02-8  | Y   | 7.88E-06                     | 3.45E-05                         | 8.61E-06        |
| Benzene                     | 71-43-2   | Y   | 7.76E-04                     | 3.39E-03                         | 8.48E-04        |
| Benzo(a)pyrene <sup>3</sup> | 50-32-8   | Y   | 2.57E-07                     | 1.12E-06                         | 2.81E-07        |
| Formaldehyde                | 50-00-0   | Y   | 7.89E-05                     | 3.45E-04                         | 8.62E-05        |
| Naphthalene <sup>3</sup>    | 91-20-3   | Y   | 1.30E-04                     | 5.68E-04                         | 1.42E-04        |
| Total PAH (POM)             | --        | Y   | 2.12E-04                     | 9.27E-04                         | 2.32E-04        |
| Toluene                     | 108-88-3  | Y   | 2.81E-04                     | 1.23E-03                         | 3.07E-04        |
| Xylene                      | 1330-20-7 | Y   | 1.93E-04                     | 8.44E-04                         | 2.11E-04        |
| <b>Total HAP Emissions</b>  |           |     |                              | <b>6.88E-03</b>                  | <b>1.72E-03</b> |

**Notes:**

- <sup>1</sup> Emission factors obtained from AP-42 Section 3.4 - Large Stationary Diesel and All Stationary Dual-fuel Engines, 10/96, Table 3.4-3 and Table 3.4-4.
- <sup>2</sup> NSPS allows for only 100 hrs/yr of non-emergency operation of these engines. Potential emissions for the emergency generator are conservatively based on 500 hr/yr.
- <sup>3</sup> Benzo(a)pyrene and naphthalene are included as HAPs in Total PAH.

**Table 16**  
**Emergency Generator Potential Emissions**  
**AA-022**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Abbreviations:**

Btu - British thermal unit  
CAS - chemical abstract service  
CH<sub>4</sub> - methane  
CO - carbon monoxide  
CO<sub>2</sub> - carbon dioxide  
CO<sub>2</sub>e - carbon dioxide equivalent  
g - gram  
gal - gallon  
HAP - hazardous air pollutant  
hp - horsepower  
hr - hour  
kg - kilogram  
kW - kilowatt  
lb - pound

MW - megawatt  
MMBtu - Million British thermal units  
NO<sub>x</sub> - nitrogen oxides  
N<sub>2</sub>O - nitrous oxide  
ODT - oven dried tons  
PAH - polycyclic aromatic hydrocarbon  
PM - particulate matter  
PM<sub>10</sub> - particulate matter with an aerodynamic diameter less than 10 microns  
PM<sub>2.5</sub> - particulate matter with an aerodynamic diameter of 2.5 microns or less  
POM - polycyclic organic matter  
SO<sub>2</sub> - sulfur dioxide  
tpy - tons per year  
VOC - volatile organic compound  
yr - year

**References:**

Advanced Environmental Interface, Inc. (1998). General Permits for Emergency Engines. INSIGHTS, 98-2, 3.  
AP-42 Chapter 3.3, Stationary Internal Combustion Engines, 10/96.



**Table 17**  
**Fire Pump Potential Emissions**  
**AA-023**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Calculation Basis**

|                             |                            |
|-----------------------------|----------------------------|
| Engine Output               | 0.10 MW                    |
| Horsepower Rating           | 131 hp                     |
| Diesel Density <sup>1</sup> | 7.1 lb/gal                 |
| Hours of Operation          | 500 hr/yr                  |
| Hourly Fuel Consumption     | 9 gal/hr <sup>1</sup>      |
| Energy Input                | 1.23 MMBtu/hr <sup>2</sup> |

**Notes:**

- <sup>1</sup> Diesel density from AP-42 Section 3.4 - Large Stationary Diesel and All Stationary Dual-fuel Engines, 10/96, Table 3.4-1, footnote a.  
<sup>2</sup> Energy calculated on a fuel consumption basis, using an energy factor of 0.137 MMBtu/gal.

**Potential Criteria Pollutant Emissions**

| Pollutant                      | Emission Factor | Units                 | Potential Emissions <sup>1</sup> |          |
|--------------------------------|-----------------|-----------------------|----------------------------------|----------|
|                                |                 |                       | (lb/hr)                          | (tpy)    |
| CO <sup>2</sup>                | 1.3             | g/kW-hr               | 0.28                             | 0.070    |
| NO <sub>x</sub> <sup>2</sup>   | 3.4             | g/kW-hr               | 0.72                             | 0.18     |
| SO <sub>2</sub> <sup>3</sup>   | 15              | ppmw                  | 0.0019                           | 4.79E-04 |
| VOC <sup>2</sup>               | 0.15            | g/kW-hr               | 0.032                            | 0.0081   |
| PM <sup>2</sup>                | 0.17            | g/kW-hr               | 0.037                            | 0.0092   |
| PM <sub>10</sub> <sup>2</sup>  | 0.17            | g/kW-hr               | 0.037                            | 0.0092   |
| PM <sub>2.5</sub> <sup>2</sup> | 0.17            | g/kW-hr               | 0.037                            | 0.0092   |
| CO <sub>2</sub>                | 74              | kg/MMBtu <sup>4</sup> | 201                              | 50.3     |
| CH <sub>4</sub>                | 3.0E-03         | kg/MMBtu <sup>4</sup> | 0.0082                           | 0.0020   |
| N <sub>2</sub> O               | 6.0E-04         | kg/MMBtu <sup>4</sup> | 0.0016                           | 4.08E-04 |
| CO <sub>2</sub> e              |                 |                       | 202                              | 50.4     |

**Notes:**

- <sup>1</sup> NSPS allows for only 100 hrs/yr of non-emergency operation. Potential emissions for the fire pump are conservatively based on 500 hr/yr.  
<sup>2</sup> Emissions factors for PM/PM<sub>10</sub>/PM<sub>2.5</sub>, NO<sub>x</sub>, hydrocarbons, and CO obtained from generator's spec sheet.  
<sup>3</sup> Sulfur content in accordance with Year 2013 standards of 40 CFR 80.510(a) as required by NSPS Subpart IIII.  
<sup>4</sup> Emission factors from Table C-1 and C-2 of 40 CFR Part 98 and Global Warming Potentials from Table A-1.

**Potential HAP Emissions**

| Pollutant                    | CAS No.   | VOC | Emission Factor <sup>1</sup> | Potential Emissions <sup>2</sup> |                 |
|------------------------------|-----------|-----|------------------------------|----------------------------------|-----------------|
|                              |           |     | (lb/hp-hr)                   | (lb/hr)                          | (tpy)           |
| Acetaldehyde                 | 75-07-0   | Y   | 5.4E-06                      | 7.03E-04                         | 1.76E-04        |
| Acrolein                     | 107-02-8  | Y   | 6.5E-07                      | 8.48E-05                         | 2.12E-05        |
| Benzene                      | 71-43-2   | Y   | 6.5E-06                      | 8.56E-04                         | 2.14E-04        |
| Benzo(a)pyrene               | 50-32-8   | Y   | 1.3E-09                      | 1.72E-07                         | 4.31E-08        |
| 1,3-Butadiene                | 106-99-0  | Y   | 2.7E-07                      | 3.59E-05                         | 8.96E-06        |
| Formaldehyde                 | 50-00-0   | Y   | 8.3E-06                      | 1.08E-03                         | 2.71E-04        |
| Naphthalene                  | 91-20-3   | Y   | 5.9E-07                      | 7.78E-05                         | 1.95E-05        |
| Total PAH (POM) <sup>3</sup> | --        | Y   | 1.2E-06                      | 1.54E-04                         | 3.85E-05        |
| Toluene                      | 108-88-3  | Y   | 2.9E-06                      | 3.75E-04                         | 9.38E-05        |
| Xylene                       | 1330-20-7 | Y   | 2.0E-06                      | 2.61E-04                         | 6.53E-05        |
| <b>Total HAP Emissions</b>   |           |     |                              | <b>3.55E-03</b>                  | <b>8.88E-04</b> |

**Notes:**

- <sup>1</sup> Emission factor obtained from AP-42 Section 3.3 - Stationary Internal Combustion Engines, 10/96, Table 3.3-2.  
<sup>2</sup> NSPS allows for only 100 hrs/yr of non-emergency operation. Potential emissions for the fire pump are conservatively based on 500 hr/yr.  
<sup>3</sup> The PAH emission factor includes all the PAH compounds listed in AP-42. Emissions for naphthalene and benzo(a)pyrene are also calculated separately. For the purposes of calculating total HAP emissions, the naphthalene and benzo(a)pyrene are not included separately to avoid double counting these emissions.

**Table 17**  
**Fire Pump Potential Emissions**  
**AA-023**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Abbreviations:**

Btu - British thermal unit  
CAS - chemical abstract service  
CH<sub>4</sub> - methane  
CO - carbon monoxide  
CO<sub>2</sub> - carbon dioxide  
CO<sub>2</sub>e - carbon dioxide equivalent  
g - gram  
gal - gallon  
HAP - hazardous air pollutant  
hp - horsepower  
hr - hour  
kg - kilogram  
kW - kilowatt  
lb - pound

MW - megawatt  
MMBtu - Million British thermal units  
NO<sub>x</sub> - nitrogen oxides  
N<sub>2</sub>O - nitrous oxide  
ODT - oven dried tons  
PAH - polycyclic aromatic hydrocarbon  
PM - particulate matter  
PM<sub>10</sub> - particulate matter with an aerodynamic diameter less than 10 microns  
PM<sub>2.5</sub> - particulate matter with an aerodynamic diameter of 2.5 microns or less  
POM - polycyclic organic matter  
SO<sub>2</sub> - sulfur dioxide  
tpy - tons per year  
VOC - volatile organic compound  
yr - year

**References:**

Advanced Environmental Interface, Inc. (1998). General Permits for Emergency Engines. INSIGHTS, 98-2, 3.  
AP-42 Chapter 3.3, Stationary Internal Combustion Engines, 10/96.

**Table 18**  
**Potential Emissions from Paved Roads**  
**AA-024**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

| Vehicle Activity                                             | Distance Traveled per Roundtrip <sup>1</sup><br>(ft) | Trips Per Day | Daily VMT | Events Per Year<br>(days) | Empty Truck Weight<br>(lb) | Loaded Truck Weight<br>(lb) | Average Truck Weight<br>(ton) | Annual VMT | PM Emission Factor <sup>2</sup> | PM <sub>10</sub> Emission Factor <sup>2</sup> | PM <sub>2.5</sub> Emission Factor <sup>2</sup> | Potential PM Emissions <sup>3</sup> |             | Potential PM <sub>10</sub> Emissions <sup>3</sup> |             | Potential PM <sub>2.5</sub> Emissions <sup>3</sup> |             |
|--------------------------------------------------------------|------------------------------------------------------|---------------|-----------|---------------------------|----------------------------|-----------------------------|-------------------------------|------------|---------------------------------|-----------------------------------------------|------------------------------------------------|-------------------------------------|-------------|---------------------------------------------------|-------------|----------------------------------------------------|-------------|
|                                                              |                                                      |               |           |                           |                            |                             |                               |            | (lb/VMT)                        | (lb/VMT)                                      | (lb/VMT)                                       | (lb/day)                            | (tpy)       | (lb/day)                                          | (tpy)       | (lb/day)                                           | (tpy)       |
| Logs Delivery to Crane Storage Area                          | 3,600                                                | 102           | 69        | 365                       | 24,000                     | 80,000                      | 26                            | 25,331     | 1.92                            | 0.38                                          | 0.094                                          | 13.3                                | 2.43        | 2.66                                              | 0.49        | 0.65                                               | 0.12        |
| Chip Delivery                                                | 4,300                                                | 171           | 140       | 365                       | 24,000                     | 80,000                      | 26                            | 50,958     | 1.92                            | 0.38                                          | 0.094                                          | 26.7                                | 4.88        | 5.35                                              | 0.98        | 1.31                                               | 0.24        |
| Bark Delivery                                                | 4,200                                                | 28            | 22        | 365                       | 24,000                     | 80,000                      | 26                            | 8,088      | 1.92                            | 0.38                                          | 0.094                                          | 4.24                                | 0.77        | 0.85                                              | 0.15        | 0.21                                               | 0.038       |
| Dry Shavings Delivery                                        | 5,000                                                | 16            | 15        | 365                       | 24,000                     | 76,000                      | 25                            | 5,583      | 1.84                            | 0.37                                          | 0.090                                          | 2.81                                | 0.51        | 0.56                                              | 0.10        | 0.14                                               | 0.025       |
| Pellet Truck Delivery to Pellet Loadout Area (Truck Back-up) | 5,000                                                | 147           | 139       | 10                        | 24,000                     | 80,000                      | 26                            | 1,393      | 1.92                            | 0.38                                          | 0.094                                          | 26.7                                | 0.13        | 5.34                                              | 0.03        | 1.31                                               | 0.0065      |
| Employee Car Parking                                         | 1,200                                                | 55            | 13        | 365                       | 4,000                      | 4,000                       | 2                             | 4,563      | 0.14                            | 0.028                                         | 0.0069                                         | 0.17                                | 0.032       | 0.035                                             | 0.006       | 0.0086                                             | 0.0016      |
| Additive Delivery                                            | 5,000                                                | 3             | 3         | 213                       | 24,000                     | 64,000                      | 22                            | 605        | 1.62                            | 0.32                                          | 0.079                                          | 0.46                                | 0.049       | 0.092                                             | 0.0098      | 0.023                                              | 0.0024      |
| <b>Total Emissions:</b>                                      |                                                      |               |           |                           |                            |                             |                               |            |                                 |                                               |                                                | <b>74.4</b>                         | <b>8.81</b> | <b>14.9</b>                                       | <b>1.76</b> | <b>3.65</b>                                        | <b>0.43</b> |

**Notes:**

<sup>1</sup> Distance traveled per round trip and daily trip counts provided by Enviva.

<sup>2</sup> Emission factors calculated based on Equation 7 from AP-42 Section 13.2.1 - Paved Roads, 01/11.

where:

$E$  = emission factor (lb/ton)  
 $k$  = particle size multiplier (dimensionless) for PM<sub>10</sub> 0.011  
 $k$  = particle size multiplier (dimensionless) for PM<sub>2.5</sub> 0.0022  
 $k$  = particle size multiplier (dimensionless) for PM<sub>2.5</sub> 0.00054  
 $SL$  = mean road surface silt loading from AP-42 Table 13.2.1-3 for quarries (g/m<sup>2</sup>) 8.2

$P$  = No. days with rainfall greater than 0.01 inch 110 Per AP-42, Section 13.2.1, Figure 13.2.1-2 (Lucedale, MS).

<sup>3</sup> Potential emissions calculated from appropriate emission factor times vehicle miles traveled with control efficiency of 90% for water / dust suppression activities followed by sweeping. Per Table 5 in Chapter 4 of the Air Pollution Engineering Manual, Air and Waste Management Association, page 141. Control efficiency (%) =  $96 - 0.263 \cdot V$ , where  $V$  is the number of vehicle passes since application of water.

**Abbreviations:**

ft - feet  
 hr - hour  
 lb - pound  
 PM - particulate matter  
 PM<sub>10</sub> - particulate matter with an aerodynamic diameter less than 10 microns  
 PM<sub>2.5</sub> - particulate matter with an aerodynamic diameter of 2.5 microns or less  
 tpy - tons per year  
 yr - year  
 VMT - vehicle miles traveled  
 VOC - volatile organic compound

**References:**

AP-42, Section 13.2.1 - Paved Roads, 01/11  
 Air Pollution Engineering Manual, Air and Waste Management Association



**Table 19**  
**Diesel Storage Tanks**  
**IAs**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

| Source ID <sup>1</sup>  | Description                              | Design Volume <sup>2</sup> | Working Volume <sup>3</sup> | Tank Dimensions |        | Orientation | Throughput <sup>3</sup> | Turnovers | VOC Emissions <sup>4</sup> |                 |
|-------------------------|------------------------------------------|----------------------------|-----------------------------|-----------------|--------|-------------|-------------------------|-----------|----------------------------|-----------------|
|                         |                                          | (gal)                      | (gal)                       | Diameter        | Length |             | (gal/yr)                |           | (lb/hr)                    | (tpy)           |
| IA                      | Emergency Generator Fuel Storage Tank    | 500                        | 450                         | 4.0             | 6      | Horizontal  | 300                     | 0.67      | 4.79E-05                   | 2.10E-04        |
| IA                      | Fire Pump Fuel Storage Tank <sup>5</sup> | 185                        | 93                          | 3.3             | 3.3    | Horizontal  | 4,500                   | 48.6      | 4.22E-05                   | 1.85E-04        |
| IA                      | Mobile Fuel Diesel Storage Tank          | 5,000                      | 2,500                       | 6.0             | 23.7   | Horizontal  | 200,000                 | 80.0      | 8.76E-04                   | 3.84E-03        |
| <b>Total Emissions:</b> |                                          |                            |                             |                 |        |             |                         |           | <b>9.66E-04</b>            | <b>4.23E-03</b> |

**Notes:**

- <sup>1</sup> Storage tanks used exclusively to store diesel are considered an insignificant activity per 11 Miss. Admin. Code Pt. 2 Ch. 1 R. 6.7.B(7).
- <sup>2</sup> Conservative design specifications.
- <sup>3</sup> Working volumes and throughputs provided by Kai Simonsen (Enviva) via email June 25, 2018.
- <sup>4</sup> Emissions calculated using EPA TANKS 4.0 software.
- <sup>5</sup> The TANKS program has a minimum allowable tank length of 5 feet. As such, emissions for the Fire Pump Fuel Storage tank are based on a length of 5 feet.

**Abbreviations:**

|                                       |                                 |
|---------------------------------------|---------------------------------|
| EPA - Environmental Protection Agency | lb - pound                      |
| ft - feet                             | yr - year                       |
| gal - gallon                          | VOC - volatile organic compound |
| IA - Insignificant Activity           |                                 |

**Table 20**  
**Propane Vaporizer Potential Emissions**  
**IA<sup>1</sup>**  
**Enviva Pellets Lucedale, LLC**  
**Lucedale, George County, Mississippi**

**Calculation Basis**

|                                    |                 |
|------------------------------------|-----------------|
| Propane Heating Value <sup>2</sup> | 91.5 MMBtu/Mgal |
| Hours of Operation                 | 8,760 hr/yr     |
| Maximum Heat Input Rate            | 1.00 MMBtu/hr   |
| Hourly Fuel Consumption            | 0.011 Mgal/hr   |

**Notes:**

- <sup>1</sup> The propane vaporizer is considered an insignificant activity per 11 Miss. Admin. Code Pt. 2 Ch. 6 R. 6.7.B(2).  
<sup>2</sup> Propane heat content from AP-42 Section 1.5 - Liquefied Petroleum Gas Production, 7/08.

**Potential Criteria Pollutant and Greenhouse Gas Emissions**

| Pollutant                                          | Emission Factor <sup>1</sup> | Units   | Potential Emissions |        |
|----------------------------------------------------|------------------------------|---------|---------------------|--------|
|                                                    |                              |         | (lb/hr)             | (tpy)  |
| CO                                                 | 7.50                         | lb/Mgal | 0.082               | 0.36   |
| NO <sub>x</sub>                                    | 13.0                         | lb/Mgal | 0.14                | 0.62   |
| SO <sub>2</sub> <sup>2</sup>                       | 0.054                        | lb/Mgal | 5.90E-04            | 0.0026 |
| VOC                                                | 1.00                         | lb/Mgal | 0.011               | 0.048  |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> Condensable | 0.50                         | lb/Mgal | 0.0055              | 0.024  |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> Filterable  | 0.20                         | lb/Mgal | 0.0022              | 0.010  |
| Total PM/PM <sub>10</sub> /PM <sub>2.5</sub>       |                              |         | 0.0077              | 0.034  |
| CO <sub>2</sub>                                    | 12,500                       | lb/Mgal | 137                 | 598    |
| CH <sub>4</sub>                                    | 0.20                         | lb/Mgal | 0.0022              | 0.010  |
| N <sub>2</sub> O                                   | 0.90                         | lb/Mgal | 0.010               | 0.043  |
| CO <sub>2</sub> e                                  |                              |         | 140                 | 611    |

**Notes:**

- <sup>1</sup> Emission factors obtained from AP-42 1.5- Liquefied Petroleum Gas Combustion, 07/08, Table 1.5-1.  
<sup>2</sup> SO<sub>2</sub> emissions are based on an assumed fuel sulfur content of 0.54 grains/100 ft<sup>3</sup> per A National Methodology and Emission Inventory for Residential Fuel Combustion.

**Potential HAP Emissions**

| Pollutant                  | CAS No. | VOC | Emission Factor <sup>1</sup> | Potential Emissions |                 |
|----------------------------|---------|-----|------------------------------|---------------------|-----------------|
|                            |         |     | (lb/MMBtu)                   | (lb/hr)             | (tpy)           |
| Benzene                    | 71-43-2 | Y   | 7.10E-04                     | 7.10E-04            | 3.11E-03        |
| Formaldehyde               | 50-00-0 | Y   | 1.50E-03                     | 1.50E-03            | 6.57E-03        |
| PAHs                       | --      | N   | 4.00E-05                     | 4.00E-05            | 1.75E-04        |
| <b>Total HAP Emissions</b> |         |     |                              | <b>2.21E-03</b>     | <b>9.86E-03</b> |

**Notes:**

- <sup>1</sup> Emission factors for propane combustion from the South Coast Air Quality Management District's Air Emissions Reporting Tool for external combustion equipment fired with LPG.

**Abbreviations:**

|                                               |                                                                                            |
|-----------------------------------------------|--------------------------------------------------------------------------------------------|
| Btu - British thermal unit                    | Mgal - Thousand gallons                                                                    |
| CAS - chemical abstract service               | NO <sub>x</sub> - nitrogen oxides                                                          |
| CH <sub>4</sub> - methane                     | N <sub>2</sub> O - nitrous oxide                                                           |
| CO - carbon monoxide                          | PAH - polycyclic aromatic hydrocarbon                                                      |
| CO <sub>2</sub> - carbon dioxide              | PM - particulate matter                                                                    |
| CO <sub>2</sub> e - carbon dioxide equivalent | PM <sub>10</sub> - particulate matter with an aerodynamic diameter less than 10 microns    |
| gal - gallon                                  | PM <sub>2.5</sub> - particulate matter with an aerodynamic diameter of 2.5 microns or less |
| HAP - hazardous air pollutant                 | SO <sub>2</sub> - sulfur dioxide                                                           |
| hr - hour                                     | tpy - tons per year                                                                        |
| lb - pound                                    | VOC - volatile organic compound                                                            |
| LPG - liquified petroleum gas                 | yr - year                                                                                  |
| MMBtu - Million British thermal units         |                                                                                            |

**References:**

A National Methodology and Emission Inventory for Residential Fuel Combustion (2001). Retrieved from <https://www3.epa.gov/ttnchie1/conference/ei12/area/haneke.pdf>.  
 AP-42 Chapter 1.5, Liquid Petroleum Gas Combustion, 07/08.  
 South Coast Air Quality Management District. AER Reporting tool. Emission factors available in the Help and Support Manual at: <http://www.aqmd.gov/home/rules-compliance/compliance/annual-emission-reporting>



## Chapter 173-400 WAC GENERAL REGULATIONS FOR AIR POLLUTION SOURCES

Last Update: 10/25/18

### WAC

|                    |                                                                                                                                |
|--------------------|--------------------------------------------------------------------------------------------------------------------------------|
| 173-400-010        | Policy and purpose.                                                                                                            |
| 173-400-020        | Applicability.                                                                                                                 |
| 173-400-025        | Adoption of federal rules.                                                                                                     |
| 173-400-030        | Definitions.                                                                                                                   |
| <u>173-400-035</u> | <u>Nonroad engines.</u>                                                                                                        |
| 173-400-036        | Relocation of portable sources.                                                                                                |
| 173-400-040        | General standards for maximum emissions.                                                                                       |
| <u>173-400-045</u> | <u>Control technology fees.</u>                                                                                                |
| 173-400-050        | Emission standards for combustion and incineration units.                                                                      |
| 173-400-060        | Emission standards for general process units.                                                                                  |
| 173-400-070        | Emission standards for certain source categories.                                                                              |
| <u>173-400-075</u> | <u>Emission standards for sources emitting hazardous air pollutants.</u>                                                       |
| 173-400-081        | Emission limits during startup and shutdown.                                                                                   |
| <u>173-400-082</u> | <u>Alternative emission limit that exceeds an emission standard in the STP.</u>                                                |
| 173-400-091        | Voluntary limits on emissions.                                                                                                 |
| <u>173-400-099</u> | <u>Registration program.</u>                                                                                                   |
| <u>173-400-100</u> | <u>Source classifications.</u>                                                                                                 |
| <u>173-400-101</u> | <u>Registration issuance.</u>                                                                                                  |
| <u>173-400-102</u> | <u>Scope of registration and reporting requirements.</u>                                                                       |
| <u>173-400-103</u> | <u>Emission estimates.</u>                                                                                                     |
| <u>173-400-104</u> | <u>Registration fees.</u>                                                                                                      |
| 173-400-105        | Records, monitoring, and reporting.                                                                                            |
| 173-400-107        | Excess emissions.                                                                                                              |
| <u>173-400-108</u> | <u>Excess emissions reporting.</u>                                                                                             |
| <u>173-400-109</u> | <u>Unavoidable excess emissions.</u>                                                                                           |
| 173-400-110        | New source review (NSR) for sources and portable sources.                                                                      |
| 173-400-111        | Processing notice of construction applications for sources, stationary sources and portable sources.'                          |
| 173-400-112        | Requirements for new sources in nonattainment areas <sup>2</sup> Review for compliance with regulations.                       |
| 173-400-113        | New sources in attainment or unclassifiable areas <sup>2</sup> Review for compliance with regulations.                         |
| <u>173-400-114</u> | <u>Requirements for replacement or substantial alteration of emission control technology at an existing stationary source.</u> |
| <u>173-400-115</u> | <u>Standards of performance for new sources.</u>                                                                               |
| 173-400-116        | Increment protection.                                                                                                          |
| 173-400-117        | Special protection requirements for federal Class I areas.                                                                     |
| 173-400-118        | Designation of Class I, II, and III areas.                                                                                     |
| <u>173-400-120</u> | <u>Bubble rules.</u>                                                                                                           |
| 173-400-131        | Issuance of emission reduction credits.                                                                                        |
| 173-400-136        | Use of emission reduction credits (ERC).                                                                                       |
| 173-400-151        | Retrofit requirements for visibility protection.                                                                               |
| 173-400-161        | Compliance schedules.                                                                                                          |
| 173-400-171        | Public notice and opportunity for public comment.                                                                              |
| 173-400-175        | Public information.                                                                                                            |
| <u>173-400-180</u> | <u>Variance.</u>                                                                                                               |
| 173-400-190        | Requirements for nonattainment areas.                                                                                          |
| 173-400-200        | Creditable stack height and dispersion techniques.                                                                             |
| 173-400-205        | Adjustment for atmospheric conditions.                                                                                         |
| 173-400-210        | Emission requirements of prior jurisdictions.                                                                                  |
| <u>173-400-220</u> | <u>Requirements for board members.</u>                                                                                         |
| <u>173-400-230</u> | <u>Regulatory actions.</u>                                                                                                     |
| <u>173-400-240</u> | <u>Criminal penalties.</u>                                                                                                     |
| <u>173-400-250</u> | <u>Appeals.</u>                                                                                                                |
| <u>173-400-260</u> | <u>Conflict of interest.</u>                                                                                                   |
| 173-400-560        | General order of approval.                                                                                                     |

### PERMITTING OF MAJOR STATIONARY SOURCES AND MAJOR MODIFICATIONS TO MAJOR STATIONARY SOURCES

|                    |                                                                                                                 |
|--------------------|-----------------------------------------------------------------------------------------------------------------|
| 173-400-700        | Review of major stationary sources of air pollution.                                                            |
| 173-400-710        | Definitions.                                                                                                    |
| 173-400-720        | Prevention of significant deterioration (PSD).                                                                  |
| 173-400-730        | Prevention of significant deterioration application processing procedures.                                      |
| 173-400-740        | PSD permitting public involvement requirements.                                                                 |
| 173-400-750        | Revisions to PSD permits.                                                                                       |
| 173-400-800        | Major stationary source and major modification in a nonattainment area.                                         |
| 173-400-810        | Major stationary source and major modification definitions.                                                     |
| 173-400-820        | Determining if a new stationary source or modification to a stationary source is subject to these requirements. |
| 173-400-830        | Permitting requirements.                                                                                        |
| 173-400-840        | Emission offset requirements.                                                                                   |
| 173-400-850        | Actual emissions plantwide applicability limitation (PAL).                                                      |
| 173-400-860        | Public involvement procedures.                                                                                  |
| <u>173-400-930</u> | <u>Emergency engines.</u>                                                                                       |

### DISPOSITION OF SECTIONS FORMERLY CODIFIED IN THIS CHAPTER

|             |                                                                                                                                                                             |
|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 173-400-080 | Compliance schedules. [Statutory Authority: RCW 70.94.331. WSR 80-11-059 (Order DE 80-14), § 173-400-080, filed 8/20/80. Statutory Authority: RCW 43.21A.080 and 70.94.331. |
|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

WSR 79-06-012 (Order DE 78-21), § 173-400-080, filed 5/8/79; Order DE 76-38, § 173-400-080, filed 12/21/76. Formerly WAC 18-04-080.] Repealed by WSR 83-09-036 (Order DE 83-13), filed 4/15/83. Statutory Authority: Chapters 43.21A and 70.94 RCW.

173-400-090 Sensitive area designation. [Statutory Authority: RCW 70.94.331. WSR 80-11-059 (Order DE 80-14), § 173-400-090, filed 8/20/80; Order DE 76-38, § 173-400-090, filed 12/21/76. Formerly WAC 18-04-090.] Repealed by WSR 83-09-036 (Order DE 83-13), filed 4/15/83. Statutory Authority: Chapters 43.21A and 70.94 RCW.

173-400-130 Regulatory actions. [Statutory Authority: RCW 43.21A.080 and 70.94.331. WSR 79-06-012 (Order DE 78-21), § 173-400-130, filed 5/8/79; Order DE 76-38, § 173-400-130, filed 12/21/76. Formerly WAC 18-04-130.] Repealed by WSR 83-09-036 (Order DE 83-13), filed 4/15/83. Statutory Authority: Chapters 43.21A and 70.94 RCW.

173-400-135 Criminal penalties. [Statutory Authority: RCW 43.21A.080 and 70.94.331. WSR 79-06-012 (Order DE 78-21), § 173-400-135, filed 5/8/79.] Repealed by WSR 83-09-036 (Order DE 83-13), filed 4/15/83. Statutory Authority: Chapters 43.21A and 70.94 RCW.

173-400-140 Appeals. [Order DE 76-38, § 173-400-140, filed 12/21/76. Formerly WAC 18-04-140.] Repealed by WSR 83-09-036 (Order DE 83-13), filed 4/15/83. Statutory Authority: Chapters 43.21A and 70.94 RCW.

173-400-141 Prevention of significant deterioration (PSD). [Statutory Authority: Chapter 70.94 RCW, RCW 70.94.141, [70.94.]152, [70.94.]331, [70.94.]510 and 43.21A.080. WSR 01-17-062 (Order 99-06), § 173-400-141, filed 8/15/01, effective 9/15/01. Statutory Authority: Chapter 70.94 RCW. WSR 96-19-054 (Order 94-35), § 173-400-141, filed 9/13/96, effective 10/14/96; WSR 93-18-007 (Order 93-03), § 173-400-141, filed 8/20/93, effective 9/20/93; WSR 91-05-064 (Order 90-06), § 173-400-141, filed 2/19/91, effective 3/22/91.] Repealed by WSR 05-03-033 (Order 03-07), filed 1/10/05, effective 2/10/05. Statutory Authority: RCW 70.94.152.

173-400-150 Variance. [Statutory Authority: RCW 43.21A.080 and 70.94.331. WSR 79-06-012 (Order DE 78-21), § 173-400-150, filed 5/8/79; Order DE 76-38, § 173-400-150, filed 12/21/76. Formerly WAC 18-04-150.] Repealed by WSR 83-09-036 (Order DE 83-13), filed 4/15/83. Statutory Authority: Chapters 43.21A and 70.94 RCW.

173-400-160 Maintenance of pay. [Statutory Authority: RCW 43.21A.080 and 70.94.331. WSR 79-06-012 (Order DE 78-21), § 173-400-160, filed 5/8/79.] Repealed by WSR 83-09-036 (Order DE 83-13), filed 4/15/83. Statutory Authority: Chapters 43.21A and 70.94 RCW.

173-400-170 Requirements for boards and director. [Statutory Authority: RCW 43.21A.080 and 70.94.331. WSR 79-06-012 (Order DE 78-21), § 173-400-170, filed 5/8/79.] Repealed by WSR 83-09-036 (Order DE 83-13), filed 4/15/83. Statutory Authority: Chapters 43.21A and 70.94 RCW.

**WAC 173-400-010 Policy and purpose.** (1) It is the policy of the department of ecology (ecology) under the authority vested in it by chapter 43.21A RCW to provide for the systematic control of air pollution from air contaminant sources and for the proper development of the state's natural resources.

(2) It is the purpose of this chapter to establish technically feasible and reasonably attainable standards and to establish rules generally applicable to the control and/or prevention of the emission of air contaminants.

[Statutory Authority: Chapter 70.94 RCW. WSR 91-05-064 (Order 90-06), § 173-400-010, filed 2/19/91, effective 3/22/91. Statutory Authority: Chapters 43.21A and 70.94 RCW. WSR 83-09-036 (Order DE 83-13), § 173-400-010, filed 4/15/83; Order DE 76-38, § 173-400-010, filed 12/21/76. Formerly WAC 18-04-010.]

**EPA effective: 6/2/95 (60 FR 28726, 6/2/95)**

**WAC 173-400-020 Applicability.** (1) The provisions of this chapter shall apply statewide, except for specific subsections where a local authority has adopted and implemented corresponding local rules that apply only to sources subject to local jurisdiction as provided under RCW 70.94.141 and 70.94.331.

(2) An authority may enforce this chapter and may also adopt standards or requirements. These standards or requirements may not be less stringent than the current state air quality rules and may be more stringent than the current regulations. Unless properly delegated by ecology, authorities do not have jurisdiction over the following sources:

(a) Specific source categories over which the state, by separate regulation, has assumed or hereafter does assume jurisdiction.

(b) Automobiles, trucks, aircraft.

(c) Those sources under the jurisdiction of the energy facility site evaluation council.

[Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-020, filed 11/28/12, effective 12/29/12; WSR 91-05-064 (Order 90-06), § 173-400-020, filed 2/19/91, effective 3/22/91. Statutory Authority: Chapters 43.21A and 70.94 RCW. WSR 83-09-036 (Order DE 83-13), § 173-400-020, filed 4/15/83. Statutory Authority: RCW 70.94.331. WSR 80-11-059 (Order DE 80-14), § 173-400-020, filed 8/20/80. Statutory Authority: RCW 43.21A.080 and 70.94.331. WSR 79-06-012 (Order DE 78-21), § 173-400-020, filed 5/8/79; Order DE 76-38, § 173-400-020, filed 12/21/76. Formerly WAC 18-04-020.]

**EPA effective: 11/3/14 (79 FR 59653, 10/3/14)**

**WAC 173-400-025 Adoption of federal rules.** Federal rules mentioned in this rule are adopted as they exist on January 24, 2018. Adopted or adopted by reference means the federal rule applies as if it was copied into this rule.

[Statutory Authority: Chapter 70.94 RCW. WSR 18-17-111 (Order 15-07), § 173-400-025, filed 8/16/18, effective 9/16/18. Statutory Authority: RCW 70.94.152, 70.94.331, 70.94.860. WSR 16-12-099 (Order 16-01), § 173-400-025, filed 5/31/16, effective 7/1/16.]

**EPA effective: 3/25/20 (85 FR 10301, 2/24/20)**

**WAC 173-400-030 Definitions.** The definitions in this section apply statewide except where a permitting authority has redefined a specific term. Except as provided elsewhere in this chapter, the definitions in this section apply throughout the chapter:

(1) **"Actual emissions"** means the actual rate of emissions of a pollutant from an emission unit, as determined in accordance with (a) through (c) of this subsection.

(a) In general, actual emissions as of a particular date shall equal the average rate, in tons per year, at which the emissions unit actually emitted the pollutant during a two-year period which precedes the particular date and which is representative of normal source operation. Ecology or an authority shall allow the use of a different time period upon a determination that it is more representative of normal source operation. Actual emissions shall be calculated using the emissions unit's actual operating hours, production rates, and types of materials processed, stored, or combusted during the selected time period.

(b) Ecology or an authority may presume that source-specific allowable emissions for the unit are equivalent to the actual emissions of the emissions unit.

(c) For any emissions unit which has not begun normal operations on the particular date, actual emissions shall equal the potential to emit of the emissions unit on that date.

(2) **"Adverse impact on visibility"** is defined in WAC 173-400-117.

(3) **"Air contaminant"** means dust, fumes, mist, smoke, other particulate matter, vapor, gas, odorous substance, or any combination thereof. "Air pollutant" means the same as "air contaminant."

(4) **"Air pollution"** means the presence in the outdoor atmosphere of one or more air contaminants in sufficient quantities, and of such characteristics and duration as is, or is likely to be, injurious to human health, plant or animal life, or property, or which unreasonably

interferes with enjoyment of life and property. For the purposes of this chapter, air pollution shall not include air contaminants emitted in compliance with chapter 17.21 RCW, the Washington Pesticide Application Act, which regulates the application and control of the use of various pesticides.

(5) **"Allowable emissions"** means the emission rate of a source calculated using the maximum rated capacity of the source (unless the source is subject to federally enforceable limits which restrict the operating rate, or hours of operation, or both) and the most stringent of the following:

(a) The applicable standards as in 40 C.F.R. Part 60, 61, 62, or 63;

(b) Any applicable SIP emissions standard including those with a future compliance date; or

(c) The emissions rate specified as a federally enforceable approval condition, including those with a future compliance date.

~~(6) **"Alternative emission limit"** or **"alternative emission limitation"** means an emission limitation that applies to a source or an emissions unit only during a specifically defined transient mode of operation. An alternative emission limitation is a component of a continuously applicable emission limit. An alternative emission limit may be a numerical limit or a design characteristic of the emission unit and associated emission controls, work practices, or other operational standard, such as a control device operating range.~~

(7) **"Ambient air"** means the surrounding outside air.

(8) **"Ambient air quality standard"** means an established concentration, exposure time, and frequency of occurrence of air contaminant(s) in the ambient air which shall not be exceeded.

(9) **"Approval order"** is defined in **"order of approval."**

(10) **"Attainment area"** means a geographic area designated by EPA at 40 C.F.R. Part 81 as having attained the National Ambient Air Quality Standard for a given criteria pollutant.

(11) **"Authority"** means any air pollution control agency whose jurisdictional boundaries are coextensive with the boundaries of one or more counties.

(12) **"Begin actual construction"** means, in general, initiation of physical on-site construction activities on an emission unit that are of a permanent nature. Such activities include, but are not limited to, installation of building supports and foundations, laying underground pipe work and construction of permanent storage structures. With respect to a change in method of operations, this term refers to those on-site activities other than preparatory activities which mark the initiation of the change.

(13) **"Best available control technology (BACT)"** means an emission limitation based on the maximum degree of reduction for each air pollutant subject to regulation under chapter 70.94 RCW emitted from or which results from any new or modified stationary source, which the permitting authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes and available methods, systems, and techniques, including fuel cleaning, clean fuels, or treatment or innovative fuel combustion techniques for control of each such pollutant. In no event shall application of the "best available control technology" result in emissions of any pollutants which will exceed the emissions allowed by any applicable standard under 40 C.F.R. Part 60 and Part 61. Emissions from any source utilizing clean fuels, or any other means, to comply

with this paragraph shall not be allowed to increase above levels that would have been required under the definition of BACT in the federal Clean Air Act as it existed prior to enactment of the Clean Air Act Amendments of 1990.

(14) **"Best available retrofit technology (BART)"** means an emission limitation based on the degree of reduction achievable through the application of the best system of continuous emission reduction for each pollutant which is emitted by an existing stationary facility. The emission limitation must be established, on a case-by-case basis, taking into consideration the technology available, the costs of compliance, the energy and nonair quality environmental impacts of compliance, any pollution control equipment in use or in existence at the source, the remaining useful life of the source, and the degree of improvement in visibility which may reasonably be anticipated to result from the use of such technology.

(15) **"Brake horsepower (BHP)"** means the measure of an engine's horsepower without the loss in power caused by the gearbox, alternator, differential, water pump, and other auxiliary components.

(16) **"Bubble"** means a set of emission limits which allows an increase in emissions from a given emissions unit in exchange for a decrease in emissions from another emissions unit, pursuant to RCW 70.94.155 and WAC 173-400-120.

(17) **"Capacity factor"** means the ratio of the average load on equipment or a machine for the period of time considered, to the manufacturer's capacity rating of the machine or equipment.

(18) **"Class I area"** means any area designated under section 162 or 164 of the federal Clean Air Act (42 U.S.C., Sec. 7472 or 7474) as a Class I area. The following areas are the Class I areas in Washington state:

- (a) Alpine Lakes Wilderness;
- (b) Glacier Peak Wilderness;
- (c) Goat Rocks Wilderness;
- (d) Mount Adams Wilderness;
- (e) Mount Rainier National Park;
- (f) North Cascades National Park;
- (g) Olympic National Park;
- (h) Pasayten Wilderness; and
- (i) Spokane Indian Reservation.

(19) **"Combustion and incineration units"** means units using combustion for waste disposal, steam production, chemical recovery or other process requirements; but excludes outdoor burning.

(20)(a) **"Commence"** as applied to construction, means that the owner or operator has all the necessary preconstruction approvals or permits and either has:

(i) Begun, or caused to begin, a continuous program of actual on-site construction of the source, to be completed within a reasonable time; or

(ii) Entered into binding agreements or contractual obligations, which cannot be canceled or modified without substantial loss to the owner or operator, to undertake a program of actual construction of the source to be completed within a reasonable time.

(b) For the purposes of this definition, "necessary preconstruction approvals" means those permits or orders of approval required under federal air quality control laws and regulations, including state, local and federal regulations and orders contained in the SIP.



(21) **"Concealment"** means any action taken to reduce the observed or measured concentrations of a pollutant in a gaseous effluent while, in fact, not reducing the total amount of pollutant discharged.

(22) **"Criteria pollutant"** means a pollutant for which there is established a National Ambient Air Quality Standard at 40 C.F.R. Part 50. The criteria pollutants are carbon monoxide (CO), particulate matter, ozone (O<sub>3</sub>) sulfur dioxide (SO<sub>2</sub>), lead (Pb), and nitrogen dioxide (NO<sub>2</sub>).

(23) **"Director"** means director of the Washington state department of ecology or duly authorized representative.

(24) **"Dispersion technique"** means a method that attempts to affect the concentration of a pollutant in the ambient air other than by the use of pollution abatement equipment or integral process pollution controls.

(25) **"Ecology"** means the Washington state department of ecology.

(26) **"Electronic means"** means email, fax, FTP site, or other electronic method approved by the permitting authority.

(27) **"Emission"** means a release of air contaminants into the ambient air.

(28) **"Emission reduction credit (ERC)"** means a credit granted pursuant to WAC 173-400-131. This is a voluntary reduction in emissions.

(29) **"Emission standard," "emission limitation" and "emission limit"** means a requirement established under the federal Clean Air Act or chapter 70.94 RCW which limits the quantity, rate, or concentration of emissions of air contaminants on a continuous basis, including any requirement relating to the operation or maintenance of a source to assure continuous emission reduction and any design, equipment, work practice, or operational standard adopted under the federal Clean Air Act or chapter 70.94 RCW.

(30) **"Emission threshold"** means an emission of a listed air contaminant at or above the following rates:

| Air Contaminant                                           | Annual Emission Rate                                                                                           |
|-----------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|
| Carbon monoxide:                                          | 100 tons per year                                                                                              |
| Fluorides:                                                | 3 tons per year                                                                                                |
| Hydrogen sulfide (H <sub>2</sub> S):                      | 10 tons per year                                                                                               |
| Lead:                                                     | 0.6 tons per year                                                                                              |
| Nitrogen oxides:                                          | 40 tons per year                                                                                               |
| Particulate matter (PM):                                  | 25 tons per year of PM<br>HPLVVLRQV<br>10 tons per year of<br>PM-2.5<br>15 tons per year of<br>PM-10 emissions |
| Reduced sulfur compounds<br>(including H <sub>2</sub> S): | 10 tons per year                                                                                               |
| Sulfur dioxide:                                           | 40 tons per year                                                                                               |
| Sulfuric acid mist:                                       | 7 tons per year                                                                                                |
| Total reduced sulfur<br>(including H <sub>2</sub> S):     | 10 tons per year                                                                                               |
| Volatile organic compounds:                               | 40 tons per year                                                                                               |

(31) **"Emissions unit" or "emission unit"** means any part of a stationary source or source which emits or would have the potential to

emit any pollutant subject to regulation under the federal Clean Air Act, chapter 70.94 or 70.98 RCW.

~~(32) "Excess emissions" means emissions of an air pollutant in excess of any applicable emission standard or an emission limit established in a permit or order, including an alternative emission limit~~

(33) **"Excess stack height"** means that portion of a stack which exceeds the greater of sixty-five meters or the calculated stack height described in WAC 173-400-200(2).

(34) **"Existing stationary facility (facility)"** is defined in WAC 173-400-151.

(35) **"Federal Clean Air Act (FCAA)"** means the federal Clean Air Act, also known as Public Law 88-206, 77 Stat. 392, December 17, 1963, 42 U.S.C. 7401 et seq., as last amended by the Clean Air Act Amendments of 1990, P.L. 101-549, November 15, 1990.

(36) **"Federal Class I area"** means any federal land that is classified or reclassified Class I. The following areas are federal Class I areas in Washington state:

- (a) Alpine Lakes Wilderness;
- (b) Glacier Peak Wilderness;
- (c) Goat Rocks Wilderness;
- (d) Mount Adams Wilderness;
- (e) Mount Rainier National Park;
- (f) North Cascades National Park;
- (g) Olympic National Park; and
- (h) Pasayten Wilderness.

(37) **"Federal land manager"** means the secretary of the department with authority over federal lands in the United States.

~~(38) "Federally enforceable" means all limitations and conditions which are enforceable by EPA, including those requirements developed under 40 C.F.R. Parts 60, 61, 62 and 63, requirements established within the Washington SIP, requirements within any approval or order established under 40 C.F.R. 52.21 or under a SIP approved new source review regulation, emissions limitation orders issued under WAC 173-400-081(4), 173-400-082, or 173-400-091~~

(39) **"Fossil fuel-fired steam generator"** means a device, furnace, or boiler used in the process of burning fossil fuel for the primary purpose of producing steam by heat transfer.

(40) **"Fugitive dust"** means a particulate emission made airborne by forces of wind, man's activity, or both. Unpaved roads, construction sites, and tilled land are examples of areas that originate fugitive dust. Fugitive dust is a type of fugitive emission.

(41) **"Fugitive emissions"** means emissions that could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening.'

(42) **"General process unit"** means an emissions unit using a procedure or a combination of procedures for the purpose of causing a change in material by either chemical or physical means, excluding combustion.

(43) **"Good engineering practice (GEP)"** refers to a calculated stack height based on the equation specified in WAC 173-400-200(2)(a)(ii).

(44) **"Greenhouse gases (GHGs)"** includes carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride.

~~(45) "Hog fuel" (hogged fuel) means waste wood that is reduced in size to facilitate burning~~



(46) **"Incinerator"** means a furnace used primarily for the thermal destruction of waste.

(47) **"In operation"** means engaged in activity related to the primary design function of the source.

(48) **"Mandatory Class I federal area"** means any area defined in Section 162(a) of the federal Clean Air Act (42 U.S.C., 7472(a)). The following areas are the mandatory Class I federal areas in Washington state:

- (a) Alpine Lakes Wilderness;
- (b) Glacier Peak Wilderness;
- (c) Goat Rocks Wilderness;
- (d) Mount Adams Wilderness;
- (e) Mount Rainier National Park;
- (f) North Cascades National Park;
- (g) Olympic National Park; and
- (h) Pasayten Wilderness;

(49) **"Masking"** means the mixing of a chemically nonreactive control agent with a malodorous gaseous effluent to change the perceived odor.

(50) **"Materials handling"** means the handling, transporting, loading, unloading, storage, and transfer of materials with no significant chemical or physical alteration.

(51) **"Modification"** means any physical change in, or change in the method of operation of, a stationary source that increases the amount of any air contaminant emitted by such source or that results in the emissions of any air contaminant not previously emitted. The term modification shall be construed consistent with the definition of modification in Section 7411, Title 42, United States Code, and with rules implementing that section.

(52) **"National Ambient Air Quality Standard (NAAQS)"** means an ambient air quality standard set by EPA at 40 C.F.R. Part 50 and includes standards for carbon monoxide (CO), particulate matter, ozone (O<sub>3</sub>), sulfur dioxide (SO<sub>2</sub>), lead (Pb), and nitrogen dioxide (NO<sub>2</sub>).

(53) **"National Emission Standards for Hazardous Air Pollutants (NESHAP)"** means the federal rules in 40 C.F.R. Part 61.

(54) **"National Emission Standards for Hazardous Air Pollutants for Source Categories"** means the federal rules in 40 C.F.R. Part 63.

(55) **"Natural conditions"** means naturally occurring phenomena that reduce visibility as measured in terms of light extinction, visual range, contrast, or coloration.

(56) **"New source"** means:

(a) The construction or modification of a stationary source that increases the amount of any air contaminant emitted by such source or that results in the emission of any air contaminant not previously emitted; and

(b) Any other project that constitutes a new source under the federal Clean Air Act.

(57) **"New Source Performance Standards (NSPS)"** means the federal rules in 40 C.F.R. Part 60.

(58) **"Nonattainment area"** means a geographic area designated by EPA at 40 C.F.R. Part 81 as exceeding a National Ambient Air Quality Standard (NAAQS) for a given criteria pollutant. An area is nonattainment only for the pollutants for which the area has been designated nonattainment.

(59) **"Nonroad engine"** means:

(a) Except as discussed in (b) of this subsection, a nonroad engine is any internal combustion engine:

(i) In or on a piece of equipment that is self-propelled or serves a dual purpose by both propelling itself and performing another function (such as garden tractors, off-highway mobile cranes and bulldozers); or

(ii) In or on a piece of equipment that is intended to be propelled while performing its function (such as lawnmowers and string trimmers); or

(iii) That, by itself or in or on a piece of equipment, is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Indicia of transportability include, but are not limited to, wheels, skids, carrying handles, dolly, trailer, or platform.

(b) An internal combustion engine is not a nonroad engine if:

(i) The engine is used to propel a motor vehicle or a vehicle used solely for competition, or is subject to standards promulgated under section 202 of the federal Clean Air Act (42 U.S.C., Sec. 7521); or

(ii) The engine is regulated by a New Source Performance Standard promulgated under section 111 of the federal Clean Air Act (42 U.S.C., Sec. 7411); or

(iii) The engine otherwise included in (a)(iii) of this subsection remains or will remain at a location for more than twelve consecutive months or a shorter period of time for an engine located at a seasonal source. A location is any single site at a building, structure, facility, or installation. Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in calculating the consecutive time period. An engine located at a seasonal source is an engine that remains at a seasonal source during the full annual operating period of the seasonal source. A seasonal source is a stationary source that remains in a single location on a permanent basis (i.e., at least two years) and that operates at that single location approximately three months (or more) each year. This paragraph does not apply to an engine after the engine is removed from the location.

(60) **"Notice of construction application"** means a written application to allow construction of a new source, modification of an existing stationary source or replacement or substantial alteration of control technology at an existing stationary source.

(61) **"Opacity"** means the degree to which an object seen through a plume is obscured, stated as a percentage.

(62) **"Outdoor burning"** means the combustion of material in an open fire or in an outdoor container, without providing for the control of combustion or the control of the emissions from the combustion. Waste wood disposal in wigwam burners or silo burners is not considered outdoor burning.

(63) **"Order"** means any order issued by ecology or a local air authority pursuant to chapter 70.94 RCW, including, but not limited to RCW 70.94.332, 70.94.152, 70.94.153, 70.94.154, and 70.94.141(3), and includes, where used in the generic sense, the terms order, corrective action order, order of approval, and regulatory order.

(64) **"Order of approval"** or **"approval order"** means a regulatory order issued by a permitting authority to approve the notice of construction application for a proposed new source or modification, or

the replacement or substantial alteration of control technology at an existing stationary source.

(65) **"Ozone depleting substance"** means any substance listed in Appendices A and B to Subpart A of 40 C.F.R. Part 82.

(66) **"Particulate matter"** or **"particulates"** means any airborne finely divided solid or liquid material with an aerodynamic diameter smaller than 100 micrometers.

(67) **"Particulate matter emissions"** means all finely divided solid or liquid material, other than uncombined water, emitted to the ambient air as measured by applicable reference methods, or an equivalent or alternative method specified in Title 40, chapter I of the Code of Federal Regulations or by a test method specified in the SIP.

(68) **"Parts per million (ppm)"** means parts of a contaminant per million parts of gas, by volume, exclusive of water or particulates.

(69) **"Permitting authority"** means ecology or the local air pollution control authority with jurisdiction over the source.

(70) **"Person"** means an individual, firm, public or private corporation, association, partnership, political subdivision, municipality, or government agency.

(71) **"PM-10"** means particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by a reference method based on 40 C.F.R. Part 50 Appendix J and designated in accordance with 40 C.F.R. Part 53 or by an equivalent method designated in accordance with 40 C.F.R. Part 53.

(72) **"PM-10 emissions"** means finely divided solid or liquid material, including condensable particulate matter, with an aerodynamic diameter less than or equal to a nominal 10 micrometers emitted to the ambient air as measured by an applicable reference method, or an equivalent or alternate method, specified in 40 C.F.R. Part 51, Appendix M (in effect on the date in WAC 173-400-025) or by a test method specified in the SIP.

(73) **"PM-2.5"** means particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers as measured by a reference method based on 40 C.F.R. Part 50 Appendix L and designated in accordance with 40 C.F.R. Part 53 or by an equivalent method designated in accordance with 40 C.F.R. Part 53.

(74) **"PM-2.5 emissions"** means finely divided solid or liquid material, including condensable particulate matter, with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers emitted to the ambient air as measured by an applicable reference method, or an equivalent or alternate method, specified in 40 C.F.R. Part 51 (in effect on the date in WAC 173-400-025) or by a test method specified in the SIP.

(75) **"Portable source"** means a type of stationary source which emits air contaminants only while at a fixed location but which is capable of being transported to various locations. Examples include a portable asphalt plant or a portable package boiler.

(76) **"Potential to emit"** means the maximum capacity of a source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design only if the limitation or the effect it would have on emissions is enforceable. Secondary emissions do not count in determining the potential to emit of a source.

(77) "**Prevention of significant deterioration (PSD)**" means the program in WAC 173-400-700 to 173-400-750.

(78) "**Projected width**" means that dimension of a structure determined from the frontal area of the structure, projected onto a plane perpendicular to a line between the center of the stack and the center of the building.

(79) "**Reasonably attributable**" means attributable by visual observation or any other technique the state deems appropriate.'

(80) "**Reasonably available control technology (RACT)**" means the lowest emission limit that a particular source or source category is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility. RACT is determined on a case-by-case basis for an individual source or source category taking into account the impact of the source upon air quality, the availability of additional controls, the emission reduction to be achieved by additional controls, the impact of additional controls on air quality, and the capital and operating costs of the additional controls. RACT requirements for any source or source category shall be adopted only after notice and opportunity for comment are afforded.

(81) "**Regulatory order**" means an order issued by a permitting authority that requires compliance with:'

(a) Any applicable provision of chapter 70.94 RCW or rules adopted there under; or

(b) Local air authority regulations adopted by the local air authority with jurisdiction over the sources to whom the order is issued.'

(82) "**Secondary emissions**" means emissions which would occur as a result of the construction or operation of a major stationary source or major modification, but do not come from the major stationary source or major modification itself. Secondary emissions must be specific, well defined, quantifiable, and impact the same general area as the major stationary source or major modification which causes the secondary emissions. Secondary emissions include emissions from any off-site support facility which would not be constructed or increase its emissions except as a result of the construction or operation of the major stationary source or major modification. Secondary emissions do not include any emissions which come directly from a mobile source such as emissions from the tailpipe of a motor vehicle, from a train, or from a vessel.

~~(83) "**Shutdown**" means, generally, the cessation of operation of a stationary source or emission unit for any reason.~~

(84) "**Source**" means all of the emissions unit(s) including quantifiable fugitive emissions, that are located on one or more contiguous or adjacent properties, and are under the control of the same person or persons under common control, whose activities are ancillary to the production of a single product or functionally related groups of products.

(85) "**Source category**" means all sources of the same type or classification.

(86) "**Stack**" means any point in a source designed to emit solids, liquids, or gases into the air, including a pipe or duct.

(87) "**Stack height**" means the height of an emission point measured from the ground-level elevation at the base of the stack.'

(88) "**Standard conditions**" means a temperature of 20°C (68°F) and a pressure of 760 mm (29.92 inches) of mercury.

~~(89) "Startup" means, generally, the setting in operation of a stationary source or emission unit for any reason.~~

(90) **"State implementation plan (SIP)"** or **"Washington SIP"** means the Washington SIP in 40 C.F.R. Part 52, Subpart WW. The SIP contains state, local and federal regulations and orders, the state plan and compliance schedules approved and promulgated by EPA, for the purpose of implementing, maintaining, and enforcing the National Ambient Air Quality Standards.

(91) **"Stationary source"** means any building, structure, facility, or installation which emits or may emit any air contaminant. This term does not include emissions resulting directly from an internal combustion engine for transportation purposes or from a nonroad engine or nonroad vehicle as defined in Section 216(11) of the federal Clean Air Act (42 U.S.C., 7550(11)).

(92) **"Sulfuric acid plant"** means any facility producing sulfuric acid by the contact process by burning elemental sulfur, alkylation acid, hydrogen sulfide, or acid sludge.

(93) **"Synthetic minor"** means any source whose potential to emit has been limited below applicable thresholds by means of an enforceable order, rule, or approval condition.

(94) **"Total reduced sulfur (TRS)"** means the sum of the sulfur compounds hydrogen sulfide, mercaptans, dimethyl sulfide, dimethyl disulfide, and any other organic sulfides emitted and measured by 40 C.F.R. Part 60, Appendix A, Test Method 16 (in effect on the date in WAC 173-400-025) or an EPA approved equivalent method and expressed as hydrogen sulfide.

(95) **"Total suspended particulate"** means particulate matter as measured by the method described in 40 C.F.R. Part 50 Appendix B.

~~(96) "Toxic air pollutant (TAP)" or "toxic air contaminant" means any toxic air pollutant listed in WAC 173-460-150. The term toxic air pollutant may include particulate matter and volatile organic compounds if an individual substance or a group of substances within either of these classes is listed in WAC 173-460-150. The term toxic air pollutant does not include particulate matter and volatile organic compounds as generic classes of compounds.~~

~~(97) "Transient mode of operation" means a short-term operating period of a source or an emission unit with a specific beginning and end, such as startup, shutdown, or maintenance.~~

(98) **"Unclassifiable area"** means an area that cannot be designated attainment or nonattainment on the basis of available information as meeting or not meeting the National Ambient Air Quality Standard for the criteria pollutant and that is listed by EPA at 40 C.F.R. Part 81.

(99) **"United States Environmental Protection Agency (USEPA)"** shall be referred to as EPA.

~~(100) "Useful thermal energy" means energy (steam, hot water, or process heat) that meets the minimum operating temperature, flow, and/or pressure required by any system that uses energy provided by the affected boiler or process heater.~~

(101) **"Visibility impairment"** means any humanly perceptible change in visibility (light extinction, visual range, contrast, or coloration) from that which would have existed under natural conditions.

(102) **"Volatile organic compound (VOC)"** means any carbon compound that participates in atmospheric photochemical reactions.

(a) Exceptions. The following compounds are not a VOC: Acetone; carbon monoxide; carbon dioxide; carbonic acid; metallic carbides or



carbonates; ammonium carbonate, methane; ethane; methylene chloride (dichloromethane); 1,1,1-trichloroethane (methyl chloroform); 1,1,2-trichloro-1,2,2-trifluoroethane (CFC-113); trichlorofluoromethane (CFC-11); dichlorodifluoromethane (CFC-12); chlorodifluoromethane (HCFC-22); trifluoromethane (HFC-23); 1,2-dichloro 1,1,2,2-tetrafluoroethane (CFC-114); chloropentafluoroethane (CFC-115); 1,1,1-trifluoro 2,2-dichloroethane (HCFC-123); 1,1,1,2-tetrafluoroethane (HFC-134a); 1,1-dichloro 1-fluoroethane (HCFC-141b); 1-chloro 1,1-difluoroethane (HCFC-142b); 2-chloro 1,1,1,2-tetrafluoroethane (HCFC-124); pentafluoroethane (HFC-125); 1,1,2,2-tetrafluoroethane (HFC-134); 1,1,1-trifluoroethane (HFC-143a); 1,1-difluoroethane (HFC-152a); parachlorobenzotrifluoride (PCBTf); cyclic, branched, or linear completely methylated siloxanes; perchloroethylene (tetrachloroethylene); 3,3-dichloro-1,1,1,2,2-pentafluoropropane (HCFC-225ca); 1,3-dichloro-1,1,2,2,3-pentafluoropropane (HCFC-225cb); 1,1,1,2,3,4,4,5,5,5-decafluoropentane (HFC 43-10mee); difluoromethane (HFC-32); ethylfluoride (HFC-161); 1,1,1,3,3,3-hexafluoropropane (HFC-236fa); 1,1,2,2,3-pentafluoropropane (HFC-245ca); 1,1,2,3,3-pentafluoropropane (HFC-245ea); 1,1,1,2,3-pentafluoropropane (HFC-245eb); 1,1,1,3,3-pentafluoropropane (HFC-245fa); 1,1,1,2,3,3-hexafluoropropane (HFC-236ea); 1,1,1,3,3-pentafluorobutane (HFC-365mfc); chlorofluoromethane (HCFC-31); 1-chloro-1-fluoroethane (HCFC-151a); 1,2-dichloro-1,1,2-trifluoroethane (HCFC-123a); 1,1,1,2,2,3,3,4,4-nonafluoro-4-methoxy-butane ( $C_4F_9OCH_3$  or HFE-7100); 2-(difluoromethoxymethyl)-1,1,1,2,3,3,3-heptafluoropropane ( $(CF_3)_2CFCF_2OCH_3$ ); 1-ethoxy-1,1,2,2,3,3,4,4,4-nonafluorobutane ( $C_4F_9OC_2H_5$  or HFE-7200); 2-(ethoxydifluoromethyl)-1,1,1,2,3,3,3-heptafluoropropane ( $(CF_3)_2CFCF_2OC_2H_5$ ); methyl acetate; 1,1,1,2,2,3,3-heptafluoro-3-methoxy-propane ( $n-C_3F_7OCH_3$  or HFE-7000); 3-ethoxy-1,1,1,2,3,4,4,5,5,6,6,6-dodecafluoro-2-(trifluoromethyl) hexane (HFE-7500); 1,1,1,2,3,3,3-heptafluoropropane (HFC 227ea); methyl formate ( $HCOOCH_3$ ); 1,1,1,2,2,3,4,5,5,5-decafluoro-3-methoxy-4-trifluoromethyl-pentane (HFE-7300); dimethyl carbonate; propylene carbonate; trans-1,3,3,3-tetrafluoropropene;  $HCF_2OCF_2H$  (HFE-134);  $HCF_2OCF_2OCF_2H$  (HFE-236cal2);  $HCF_2OCF_2CF_2OCF_2H$  (HFE-338pcc13);  $HCF_2OCF_2OCF_2CF_2OCF_2H$  (H-Galden 1040x or H-Galden ZT 130 (or 150 or 180)); trans 1-chloro-3,3,3-trifluoroprop-1-ene; 2,3,3,3-tetrafluoropropene; 2-amino-2-methyl-1-propanol; t-butyl acetate; 1,1,2,2-tetrafluoro-1-(2,2,2-trifluoroethoxy) ethane; and perfluorocarbon compounds that fall into these classes:

- (i) Cyclic, branched, or linear completely fluorinated alkanes;
- (ii) Cyclic, branched, or linear completely fluorinated ethers with no unsaturations;
- (iii) Cyclic, branched, or linear completely fluorinated tertiary amines with no unsaturations; and
- (iv) Sulfur containing perfluorocarbons with no unsaturations and with sulfur bonds only to carbon and fluorine.

(b) For the purpose of determining compliance with emission limits, VOC will be measured by the appropriate methods in 40 C.F.R. Part 60, Appendix A (in effect on the date in WAC 173-400-025). Where the method also measures compounds with negligible photochemical reactivity, these negligibly reactive compounds may be excluded as VOC if the amount of the compounds is accurately quantified, and the exclusion is approved by ecology, the authority, or EPA.

(c) As a precondition to excluding these negligibly reactive compounds as VOC or at any time thereafter, ecology or the authority may

require an owner or operator to provide monitoring or testing methods and results demonstrating, to the satisfaction of ecology, the authority, or EPA the amount of negligibly reactive compounds in the source's emissions.

~~(103) "Wigwam" or "silo burner" means a cone-shaped or cylindrical structure that burns waste wood for disposal. A silo burner is a cylinder and may be made with refractory material rather than metal.~~

~~(104) "Wood-fired boiler" means an enclosed device using controlled flame combustion of wood or waste wood with the primary purpose of recovering thermal energy in the form of a steam or hot water boiler that burns wood or waste wood for fuel for the primary purpose of producing hot water or steam by heat transfer. Controlled flame combustion refers to a steady-state, or near steady-state, process wherein fuel and/or air feed rates are controlled.~~

(105) **"Waste wood"** means wood pieces or particles generated as a by-product or waste from the manufacturing of wood products, and the handling and storage of raw materials, trees, and stumps. This includes, but is not limited to, sawdust, chips, shavings, bark, pulp, log sort yard waste, and wood materials from forest health logging, land clearing or pruning, but does not include wood pieces or particles containing chemical preservatives such as creosote, pentachlorophenol, or copper-chrome-arsenate.

[Statutory Authority: Chapter 70.94 RCW. WSR 18-17-111 (Order 15-07), § 173-400-030, filed 8/16/18, effective 9/16/18; WSR 12-24-027 (Order 11-10), § 173-400-030, filed 11/28/12, effective 12/29/12; WSR 11-06-060 (Order 09-01), § 173-400-030, filed 3/1/11, effective 4/1/11. Statutory Authority: RCW 70.94.395 and 70.94.331. WSR 07-11-039 (Order 06-03), § 173-400-030, filed 5/8/07, effective 6/8/07. Statutory Authority: RCW 70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-030, filed 1/10/05, effective 2/10/05. Statutory Authority: Chapter 70.94 RCW, RCW 70.94.141, [70.94.]152, [70.94.]331, [70.94.]510 and 43.21A.080. WSR 01-17-062 (Order 99-06), § 173-400-030, filed 8/15/01, effective 9/15/01. Statutory Authority: RCW 70.94.152. WSR 98-01-183 (Order 96-01), § 173-400-030, filed 12/23/97, effective 1/23/98. Statutory Authority: Chapter 70.94 RCW. WSR 96-19-054 (Order 94-35), § 173-400-030, filed 9/13/96, effective 10/14/96; WSR 95-07-126 (Order 93-40), § 173-400-030, filed 3/22/95, effective 4/22/95; WSR 93-18-007 (Order 93-03), § 173-400-030, filed 8/20/93, effective 9/20/93; WSR 91-05-064 (Order 90-06), § 173-400-030, filed 2/19/91, effective 3/22/91. Statutory Authority: RCW 70.94.331, 70.94.395 and 70.94.510. WSR 85-06-046 (Order 84-48), § 173-400-030, filed 3/6/85. Statutory Authority: Chapters 43.21A and 70.94 RCW. WSR 83-09-036 (Order DE 83-13), § 173-400-030, filed 4/15/83. Statutory Authority: RCW 70.94.331. WSR 80-11-059 (Order DE 80-14), § 173-400-030, filed 8/20/80. Statutory Authority: RCW 43.21A.080 and 70.94.331. WSR 79-06-012 (Order DE 78-21), § 173-400-030, filed 5/8/79; Order DE 76-38, § 173-400-030, filed 12/21/76. Formerly WAC 18-04-030.]

|                                               |
|-----------------------------------------------|
| EPA effective: 3/25/20 (85 FR 10301, 2/24/20) |
|-----------------------------------------------|



**173-400-030 Definitions.**

(30) "Excess emissions" means emissions of an air pollutant in excess of any applicable emission standard.

(36) "Federally enforceable" means all limitations and conditions which are enforceable by EPA, including those requirements developed under 40 C.F.R. Parts 60, 61, 62 and 63, requirements established within the Washington SIP, requirements within any approval or order established under 40 C.F.R. 52.21 or under a SIP approved new source review regulation, and emissions limitation orders issued under WAC 173-400-091.

|                                                                         |
|-------------------------------------------------------------------------|
| State effective: 12/29/12; EPA effective: 11/3/14 (79 FR 59653,10/3/14) |
|-------------------------------------------------------------------------|

**WAC 173-400-036 Relocation of portable sources. (1) Applicability.**

(a) Portable sources that meet the requirements of this section may without obtaining a site-specific or permitting authority-specific order of approval relocate and operate in any jurisdiction in which the permitting authority has adopted this section by reference. The owner or operator of a portable source may file a new notice of construction application in compliance with WAC 173-400-110 each time the portable source relocates in lieu of participating in the inter-jurisdictional provisions in this section.

(b) Permitting authority participation in the inter-jurisdictional provisions of this section is optional. This section applies only in those jurisdictions where the permitting authority has adopted it. Nothing in this section affects a permitting authority's ability to enter into an agreement with another permitting authority to allow inter-jurisdictional relocation of a portable source under conditions other than those listed here except that subsection (2) of this section applies statewide.

(c) This section applies to sources that move from the jurisdiction of one permitting authority to the jurisdiction of another permitting authority, inter-jurisdictional relocation. This section does not apply to intra-jurisdictional relocation.

(d) Engines subject to WAC 173-400-035 Nonroad engines are not portable sources subject to this section.

(2) **Portable sources in nonattainment areas.** If a portable source is locating in a nonattainment area and if the source emits the pollutants or pollutant precursors for which the area is classified as non-attainment, then the source must acquire a site-specific order of approval.

(3) **Major stationary sources.** If a portable source is a major stationary source then it must also comply with WAC 173-400-700 through 173-400-750 as applicable.

(4) **Relocation requirements.** Portable sources are allowed to operate at a new location without obtaining an order of approval from the permitting authority with jurisdiction over the new location provided that:

(a) A permitting authority in Washington state issued a notice of construction order of approval for the portable source after July 1, 2010, identifying the emission units as a "portable source";

(b) The owner/operator of the portable source submits a relocation notice on a form provided by the permitting authority and a copy of the applicable portable source order of approval to the permitting authority with jurisdiction over the intended operation location a minimum of fifteen calendar days before the portable source begins operation at the new location;

(c) The owner/operator submits the emission inventory required under WAC 173-400-105 to each permitting authority in whose jurisdiction the portable source operated during the preceding year. The data must be sufficient in detail to enable each permitting authority to calculate the emissions within its jurisdiction and the yearly aggregate.

(d) Operation at any location under this provision is limited to one year or less. Operations lasting more than one year must obtain a site specific order of approval.

(5) **Enforcement of the order of approval.** The permitting authority with jurisdiction over the location where a portable source is operating has authority to enforce the conditions of the order of approval.

val that authorizes the portable source operation, regardless of which permitting authority issued the order of approval. All persons who receive an order of approval must comply with all approval conditions contained in the order of approval.

(6) **Change of conditions to orders of approval.** To change the conditions in an order of approval, the owner/operator must obtain a new order of approval from the permitting authority with jurisdiction over the portable source.

(7) **Portable source modification.** Prior to beginning actual construction or installation of a modification of a portable source, the owner/operator must obtain a new order of approval from the permitting authority with jurisdiction over the portable source.

[Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-036, filed 11/28/12, effective 12/29/12; WSR 11-06-060 (Order 09-01), § 173-400-036, filed 3/1/11, effective 4/1/11.]'

EPA effective: 5/29/15 (80 FR 23721, 4/29/15)

**WAC 173-400-040 General standards for maximum emissions. (1)**  
**General requirements.**

(a) All sources and emissions units are required to meet the emission standards of this chapter. Where an emission standard listed in another chapter is applicable to a specific emissions unit, such standard takes precedence over a general emission standard listed in this chapter.

(b) When two or more emissions units are connected to a common stack and the operator elects not to provide the means or facilities to sample emissions from the individual emissions units, and the relative contributions of the individual emissions units to the common discharge are not readily distinguishable, then the emissions of the common stack must meet the most restrictive standard of any of the connected emissions units.

(c) All emissions units are required to use reasonably available control technology (RACT) which may be determined for some sources or source categories to be more stringent than the applicable emission limitations of any chapter of Title 173 WAC. Where current controls are determined to be less than RACT, the permitting authority shall, as provided in RCW 70.94.154, define RACT for each source or source category and issue a rule or regulatory order requiring the installation of RACT.

~~(2) **Visible emissions.** No person shall cause or allow the emission for more than three minutes, in any one hour, of an air contaminant from any emissions unit which at the emission point, or within a reasonable distance of the emission point, exceeds twenty percent opacity as determined by ecology method 9A. The following are exceptions to this standard:~~

~~(a) Soot blowing or grate cleaning alternate visible emission standard.~~

~~(i) This provision is in effect until the effective date of EPA's removal of the September 20, 1993, version of WAC 173-400-107 from the SIP. The opacity emission standard in subsection (2) of this section shall apply except when the emissions occur due to soot blowing/grate cleaning and the operator can demonstrate that the emissions will not exceed twenty percent opacity for more than fifteen minutes in any eight consecutive hours. The intent of this provision is to allow the soot blowing and grate cleaning necessary to the operation of boiler facilities. This practice, except for testing and trouble shooting, is~~

to be scheduled for the same approximate times each day and the permitting authority must be advised of the schedule.'

(ii) This provision takes effect on the effective date of EPA's removal of the September 20, 1993, version of WAC 173-400-107 from the SIP. For emissions that occur due to soot blowing or grate cleaning of a hog fuel or wood-fired boiler: Visible emissions (as determined by ecology method 9A) shall not exceed twenty percent opacity; except that opacity shall not exceed forty percent for up to a fifteen minute period in any eight consecutive hours. For this provision to apply, the owner or operator must:

(A) Schedule the soot blowing and/or grate cleaning for the same approximate time(s) each day;

(B) Notify the permitting authority in writing of the schedule before using the forty percent standard; and

(C) Maintain contemporaneous records sufficient to demonstrate compliance. Records must include the date, start time, and stop time of each episode, and the results of opacity readings conducted during this time.

(b) When the owner or operator of a source supplies valid data to show that the presence of uncombined water is the only reason for the opacity to exceed twenty percent or an alternative opacity standard established in this section.

(c) When two or more emission units are connected to a common stack, the permitting authority may allow or require the use of an alternate time period if it is more representative of normal operations.

(d) When an alternative opacity limit has been established per RCW 70.94.331 (2)(c), WAC 173-400-081(4) or 173-400-082.

(e) Alternative visible emission standard for a hog fuel or wood-fired boiler in operation before January 24, 2018. This provision takes effect on the effective date of EPA's removal of the September 20, 1993, version of WAC 173-400-107 from the SIP. For emissions that occur due to planned startup or shutdown of a hog fuel or wood-fired boiler with dry particulate matter controls, an owner or operator may use the alternative standard in this subsection when all of the following requirements are met.

Note: This subsection does not apply to a combustion unit with wet particulate matter controls.

(i) A planned startup or shutdown means that the owner or operator notifies the permitting authority:

(A) At least twenty-four hours prior to the planned boiler start-up or shutdown; or

(B) Within two hours after restarting the boiler for a startup within twenty-four hours after the end of an unplanned shutdown (i.e., malfunction or upset).

Note: A shutdown due to a malfunction is part of the malfunction.

(ii) Startup begins when fuel is ignited in the boiler fire box.

(iii) Startup ends:

(A) When the boiler starts supplying useful thermal energy; or

(B) Four hours after the boiler starts supplying useful thermal energy if the facility follows the work practices in (e)(vi)(B) of this subsection.

(iv) Shutdown begins when the boiler no longer supplies useful thermal energy, or when no fuel is being fed to the boiler or process heater, whichever is earlier.

(v) Shutdown ends when the boiler or process heater no longer supplies useful thermal energy and no fuel is being combusted in the boiler.

(vi) The facility complies with one of the following requirements:

(A) Visible emissions during startup or shutdown shall not exceed forty percent opacity for more than three minutes in any hour, as determined by ecology method 9A; or

(B) During startup or shutdown, the owner or operator shall:

(I) Operate all continuous monitoring systems;

(II) In the boiler, use only clean fuel identified in 5.b. in Table 3 in 40 C.F.R. Part 63, Subpart DDDDD;

(III) Engage all applicable control devices so as to comply with the twenty percent opacity standard within four hours of the start of supplying useful thermal energy;

(IV) Engage and operate particulate matter control within one hour of first feeding fuels that are not clean fuels; and

(V) Develop and implement a written startup and shutdown plan. The plan must minimize the startup period according to the manufacturer's recommended procedure. In the absence of manufacturer's recommendation, the owner or operator shall use the recommended startup procedure for a unit of a similar design. The plan must be maintained on-site and available upon request for public inspection.

(vii) The facility maintains records sufficient to demonstrate compliance with (e)(i) through (v) of this subsection. The records must include the following:

(A) The date and time of notification of the permitting authority;

(B) The date and time when startup and shutdown began;

(C) The date and time when startup and shutdown ended;

(D) The compliance option in (e)(vi) of this subsection that was chosen (either (A) or (B)) and documentation of how the conditions of that option were met.

(f) Furnace refractory alternative visible emission standard. This provision takes effect on the effective date of EPA's removal of the September 20, 1993, version of WAC 173-400-107 from the SIP. For emissions that occur during curing of furnace refractory in a lime kiln or boiler, visible emissions (as determined by ecology method 9A) shall not exceed forty percent opacity for more than three minutes in any hour, except when (b) of this subsection applies. For this provision to apply, the owner or operator must meet all of the following requirements:

(i) The total duration of refractory curing shall not exceed thirty-six hours; and

(ii) Use only clean fuel identified in 5.b. in Table 3 in 40 C.F.R. Part 63, Subpart DDDDD; and

(iii) The owner or operator provides a copy of the manufacturers instructions on curing refractory to the permitting authority; and

(iv) The manufacturer's instructions on curing refractory must be followed, including all instructions on temperature increase rates and holding temperatures and time; and

(v) The emission controls must be engaged as soon as possible during the curing process; and

(vi) The permitting authority must be notified at least one working day prior to the start of the refractory curing process.

(g) Visible emissions reader certification testing. Visible emissions from the "smoke generator" used during testing and certifying visible emission readers are exempt from the twenty percent opacity limit. Testing must follow testing and certification requirements in 40 C.F.R. Part 60, Appendix A, Test Method 9 (in effect on the date in

~~WAC 173-400-025) and Source Test Methods 9A and 9B in Source Test Manual - Procedures for Compliance Testing, state of Washington, department of ecology, as of September 20, 2004, on file at ecology.~~

~~(h) Military training exercises. Visible emissions during military obscurant training exercises are exempt from the twenty percent opacity limit when the following requirements are met.~~

~~(i) No visible emissions shall cross the boundary of the military training site/reservation.~~

~~(ii) The operation shall have in place methods, which have been reviewed and approved by the permitting authority, to detect changes in weather that would cause the obscurant to cross the site boundary either during the course of the exercise or prior to the start of the exercise. The approved methods shall include provisions that result in cancellation of the training exercise, cease the use of obscurants during the exercise until weather conditions would allow such training to occur without causing obscurant to leave the site boundary of the military site/reservation.~~

~~(i) Firefighter training. Visible emissions from fixed and mobile firefighter training facilities occurring during the training of firefighters are exempt from the twenty percent opacity limit. Compliance with chapter 173-425 WAC is required.~~

~~(3) **Fallout.** No person shall cause or allow the emission of particulate matter from any source to be deposited beyond the property under direct control of the owner or operator of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited.~~

(4) **Fugitive emissions.** The owner or operator of any emissions unit engaging in materials handling, construction, demolition or other operation which is a source of fugitive emission:

(a) If located in an attainment area and not impacting any nonattainment area, shall take reasonable precautions to prevent the release of air contaminants from the operation.

(b) If the emissions unit has been identified as a significant contributor to the nonattainment status of a designated nonattainment area, the owner or operator shall be required to use reasonable and available control methods, which shall include any necessary changes in technology, process, or other control strategies to control emissions of the air contaminants for which nonattainment has been designated.

~~(5) **Odors.** Any person who shall cause or allow the generation of any odor from any source or activity which may unreasonably interfere with any other property owner's use and enjoyment of her or his property must use recognized good practice and procedures to reduce these odors to a reasonable minimum.~~

(6) **Emissions detrimental to persons or property.** No person shall cause or allow the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business.

(7) **Sulfur dioxide.** No person shall cause or allow the emission of a gas containing sulfur dioxide from any emissions unit in excess of one thousand ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of sixty consecutive minutes.

(8) **Concealment and masking.** No person shall cause or allow the installation or use of any means which conceals or masks an emission of an air contaminant which would otherwise violate any provisions of this chapter.

(9) **Fugitive dust.**

(a) The owner or operator of a source or activity that generates fugitive dust must take reasonable precautions to prevent that fugitive dust from becoming airborne and must maintain and operate the source to minimize emissions.

(b) The owner or operator of any existing source or activity that generates fugitive dust that has been identified as a significant contributor to a PM-10 or PM-2.5 nonattainment area is required to use reasonably available control technology to control emissions. Significance will be determined by the criteria found in WAC 173-400-113(4).

[Statutory Authority: Chapter 70.94 RCW. WSR 18-17-111 (Order 15-07), § 173-400-040, filed 8/16/18, effective 9/16/18. Statutory Authority: RCW 70.94.152, 70.94.331, 70.94.860. WSR 16-12-099 (Order 16-01), § 173-400-040, filed 5/31/16, effective 7/1/16. Statutory Authority: Chapter 70.94 RCW. WSR 11-06-060 (Order 09-01), § 173-400-040, filed 3/1/11, effective 4/1/11. Statutory Authority: RCW 70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-040, filed 1/10/05, effective 2/10/05. Statutory Authority: Chapter 70.94 RCW, RCW 70.94.141, [70.94.]152, [70.94.]331, [70.94.]510 and 43.21A.080. WSR 01-17-062 (Order 99-06), § 173-400-040, filed 8/15/01, effective 9/15/01. Statutory Authority: [RCW 70.94.331, 70.94.510 and chapter 70.94 RCW.] WSR 00-23-130 (Order 98-27), § 173-400-040, filed 11/22/00, effective 12/23/00. Statutory Authority: Chapter 70.94 RCW. WSR 93-18-007 (Order 93-03), § 173-400-040, filed 8/20/93, effective 9/20/93; WSR 91-05-064 (Order 90-06), § 173-400-040, filed 2/19/91, effective 3/22/91. Statutory Authority: Chapters 43.21A and 70.94 RCW. WSR 83-09-036 (Order DE 83-13), § 173-400-040, filed 4/15/83. Statutory Authority: RCW 70.94.331. WSR 80-11-059 (Order DE 80-14), § 173-400-040, filed 8/20/80. Statutory Authority: RCW 43.21A.080 and 70.94.331. WSR 79-06-012 (Order DE 78-21), § 173-400-040, filed 5/8/79; Order DE 76-38, § 173-400-040, filed 12/21/76. Formerly WAC 18-04-040.]

EPA effective: 3/25/20 (85 FR 10301, 2/24/20)



## 173-400-040 General Standards for Maximum Emissions.

(2) Visible emissions. No person shall cause or allow the emission for more than three minutes, in any one hour, of an air contaminant from any emissions unit which at the emission point, or within a reasonable distance of the emission point, exceeds twenty percent opacity except:

(a) When the emissions occur due to soot blowing/grate cleaning and the operator can demonstrate that the emissions will not exceed twenty percent opacity for more than fifteen minutes in any eight consecutive hours. The intent of this provision is to allow the soot blowing and grate cleaning necessary to the operation of boiler facilities. This practice, except for testing and trouble shooting, is to be scheduled for the same approximate times each day and the permitting authority must be advised of the schedule.

(b) When the owner or operator of a source supplies valid data to show that the presence of uncombined water is the only reason for the opacity to exceed twenty percent.

~~(c) When two or more emission units are connected to a common stack, the permitting authority may allow or require the use of an alternate time period if it is more representative of normal operations.~~

~~(d) When an alternate opacity limit has been established per RCW 70.94.331 (2)(c).~~

(e) Exemptions from twenty percent opacity standard.

(i) Visible emissions reader certification testing. Visible emissions from the "smoke generator" used for testing and certification of visible emissions readers per the requirements of 40 C.F.R. Part 60, Appendix A, test method 9 (in effect on the date in WAC 173-400-025) and ecology methods 9A and 9B shall be exempt from compliance with the twenty percent opacity limitation while being used for certifying visible emission readers.

(ii) Military training exercises. Visible emissions resulting from military obscurant training - exercises are exempt from compliance with the twenty percent opacity limitation provided the following criteria are met: -

(A) No visible emissions shall cross the boundary of the military training site/reservation.

(B) The operation shall have in place methods, which have been reviewed and approved by the permitting authority, to detect changes in weather that would cause the obscurant to cross the site boundary either during the course of the exercise or prior to the start of the exercise. The approved methods shall include provisions that result in cancellation of the training exercise, cease the use of obscurants during the exercise until weather conditions would allow such training to occur without causing obscurant to leave the site boundary of the military site/reservation.

(iii) Firefighter training. Visible emissions from fixed and mobile firefighter training facilities while being used to train firefighters and while complying with the requirements of chapter 173-425 WAC.

|                                                                          |
|--------------------------------------------------------------------------|
| State effective: 07/01/16, EPA effective: 11/7/16 (81 FR 69385, 10/6/16) |
|--------------------------------------------------------------------------|

~~(9) Fugitive dust.~~

~~(a) The owner or operator of a source or activity that generates fugitive dust must take reasonable precautions to prevent that fugitive dust from becoming airborne and must maintain and operate the source to minimize emissions.~~

~~(b) The owner or operator of any existing source or activity that generates fugitive dust that has been identified as a significant contributor to a PM-10 or PM-2.5 nonattainment area is required to use reasonably available control technology to control emissions. Significance will be determined by the criteria found in WAC 173-400-113(4).~~

~~[Statutory Authority: Chapter 70.94 RCW, WSR 18-17-111 (Order 15-07), § 173-400-040, filed 8/16/18, effective 9/16/18. Statutory Authority: RCW 70.94.152, 70.94.331, 70.94.860, WSR 16-12-099 (Order 16-01), § 173-400-040, filed 5/31/16, effective 7/1/16. Statutory Authority: Chapter 70.94 RCW, WSR 11-06-060 (Order 09-01), § 173-400-040, filed 3/1/11, effective 4/1/11. Statutory Authority: RCW 70.94.152, WSR 05-03-033 (Order 03-07), § 173-400-040, filed 1/10/05, effective 2/10/05. Statutory Authority: Chapter 70.94 RCW, RCW 70.94.141, [70.94.1152, [70.94.1331, [70.94.1510 and 43.21A.080, WSR 01-17-062 (Order 99-06), § 173-400-040, filed 8/15/01, effective 9/15/01. Statutory Authority: [RCW 70.94.331, 70.94.510 and chapter 70.94 RCW,] WSR 00-23-130 (Order 98-27), § 173-400-040, filed 11/22/00, effective 12/23/00. Statutory Authority: Chapter 70.94 RCW, WSR 93-18-007 (Order 93-03), § 173-400-040, filed 8/20/93, effective 9/20/93; WSR 91-05-064 (Order 90-06), § 173-400-040, filed 2/19/91, effective 3/22/91. Statutory Authority: Chapters 43.21A and 70.94 RCW, WSR 83-09-036 (Order DE 83-13), § 173-400-040, filed 4/15/83. Statutory Authority: RCW 70.94.331, WSR 80-11-059 (Order DE 80-14), § 173-400-040, filed 8/20/80. Statutory Authority: RCW 43.21A.080 and 70.94.331, WSR 79-06-012 (Order DE 78-21), § 173-400-040, filed 5/8/79; Order DE 76-38, § 173-400-040, filed 12/21/76. Formerly WAC 18-04-040.]~~

~~**WAC 173-400-045 Control technology fees.** Fees can be found in chapter 173-455 WAC.~~

~~[Statutory Authority: RCW 70.94.181, [70.94.1152, [70.94.1331, [70.94.1650, [70.94.1745, [70.94.1892, [70.94.1011, WSR 07-19-005 (Order 07-10), § 173-400-045, filed 9/6/07, effective 10/7/07. Statutory Authority: Chapter 70.94 RCW, WSR 96-19-054 (Order 94-35), § 173-400-045, filed 9/13/96, effective 10/14/96. Statutory Authority: RCW 70.94.153 and 70.94.154, WSR 94-17-070, § 173-400-045, filed 8/15/94, effective 9/15/94.]~~

**WAC 173-400-050 Emission standards for combustion and incineration units.** (1) Combustion and incineration emissions units must meet all requirements of WAC 173-400-040 and, in addition, no person shall cause or allow emissions of particulate matter in excess of 0.23 gram per dry cubic meter at standard conditions (0.1 grain/dscf), except, for an emissions unit combusting waste wood for the production of steam. No person shall allow the emission of particulate matter in excess of 0.46 gram per dry cubic meter at standard conditions (0.2 grain/dscf), as measured by 40 C.F.R. Part 60, Appendix A, Test Method 5 (in effect on the date in WAC 173-400-025) or approved procedures in *Source Test Manual - Procedures for Compliance Testing*, state of Wash-

ington, department of ecology, as of September 20, 2004, on file at ecology.

~~(2) For any incinerator, no person shall cause or allow emissions in excess of one hundred ppm of total carbonyls as measured by Source Test Method 14 procedures in Source Test Manual - Procedures for Compliance Testing, state of Washington, department of ecology, as of September 20, 2004, on file at ecology. An applicable EPA reference method or other procedures to collect and analyze for the same compounds collected in the ecology method may be used if approved by the permitting authority prior to its use.~~

~~(a) **Incinerators** not subject to the requirements of chapter 173-434 WAC or WAC 173-400-050 (4) or (5), or requirements in WAC 173-400-075 (40 C.F.R. Part 63, Subpart EEE in effect on the date in WAC 173-400-025) and WAC 173-400-115 (40 C.F.R. Part 60, Subparts E, Ea, Eb, Ec, AAAA, and CCCC (in effect on the date in WAC 173-400-025)) shall be operated only during daylight hours unless written permission to operate at other times is received from the permitting authority.~~

~~(b) Total carbonyls means the concentration of organic compounds containing the =C=O radical as collected by Source Test Method 14 procedures in Source Test Manual - Procedures for Compliance Testing, state of Washington, department of ecology, as of September 20, 2004, on file at ecology.~~

(3) Measured concentrations for combustion and incineration units shall be adjusted for volumes corrected to seven percent oxygen, except when the permitting authority determines that an alternate oxygen correction factor is more representative of normal operations such as the correction factor included in an applicable NSPS or NESHAP, actual operating characteristics, or the manufacturer's specifications for the emission unit.

~~(4) **Commercial and industrial solid waste incineration units** constructed on or before November 30, 1999.'~~

Note: Subsection (2) of this section (a state-only provision) does not apply to a unit subject to this subsection because this section is based on federal requirements.

~~(a) Definitions~~

~~(i) "Commercial and industrial solid waste incineration (CISWI) unit" means any combustion device that combusts commercial and industrial waste, as defined in this subsection. The boundaries of a CISWI unit are defined as, but not limited to, the commercial or industrial solid waste fuel feed system, grate system, flue gas system, and bottom ash. The CISWI unit does not include air pollution control equipment or the stack. The CISWI unit boundary starts at the commercial and industrial solid waste hopper (if applicable) and extends through two areas:~~

~~(A) The combustion unit flue gas system, which ends immediately after the last combustion chamber.~~

~~(B) The combustion unit bottom ash system, which ends at the truck loading station or similar equipment that transfers the ash to final disposal. It includes all ash handling systems connected to the bottom ash handling system.~~

~~(ii) "Commercial and industrial solid waste" means solid waste combusted in an enclosed device using controlled flame combustion without energy recovery that is a distinct operating unit of any commercial or industrial facility (including field erected, modular, and custom built incineration units operating with starved or excess air), or solid waste combusted in an air curtain incinerator without energy recovery that is a distinct operating unit of any commercial or industrial facility.~~

(b) Applicability. This section applies to incineration units that meet all three criteria:

(i) The incineration unit meets the definition of CISWI unit in this subsection.

(ii) The incineration unit commenced construction on or before November 30, 1999.

(iii) The incineration unit is not exempt under (c) of this sub-section.'

(c) The following types of incineration units are exempt from this subsection:

(i) ~~Pathological waste incineration units.~~ Incineration units burning 90 percent or more by weight (on a calendar quarter basis and excluding the weight of auxiliary fuel and combustion air) of pathological waste, low-level radioactive waste, and/or chemotherapeutic waste as defined in 40 C.F.R. 60.2265 (in effect on the date in WAC 173-400-025) are not subject to this section if you meet the two requirements specified in (c)(i)(A) and (B) of this subsection.

(A) Notify the permitting authority that the unit meets these criteria.

(B) Keep records on a calendar quarter basis of the weight of pathological waste, low-level radioactive waste, and/or chemotherapeutic waste burned, and the weight of all other fuels and wastes burned in the unit.

(ii) ~~Agricultural waste incineration units.~~ Incineration units burning 90 percent or more by weight (on a calendar quarter basis and excluding the weight of auxiliary fuel and combustion air) of agricultural wastes as defined in 40 C.F.R. 60.2265 (in effect on the date in WAC 173-400-025) are not subject to this section if you meet the two requirements specified in (c)(ii)(A) and (B) of this subsection.

(A) Notify the permitting authority that the unit meets these criteria.

(B) Keep records on a calendar quarter basis of the weight of agricultural waste burned, and the weight of all other fuels and wastes burned in the unit.

(iii) ~~Municipal waste combustion units.~~ Incineration units that meet either of the two criteria specified in (c)(iii)(A) and (B) of this subsection.

(A) Units are regulated under 40 C.F.R. Part 60, Subpart Ea or Subpart Eb (in effect on the date in WAC 173-400-025); Spokane County Air Pollution Control Authority Regulation 1, Section 6.17 (in effect on February 13, 1999); 40 C.F.R. Part 60, Subpart AAAA (in effect on the date in WAC 173-400-025); or WAC 173-400-050(5).

(B) Units burn greater than 30 percent municipal solid waste or refuse-derived fuel, as defined in 40 C.F.R. Part 60 (in effect on the date in WAC 173-400-025), Subparts Ea, Eb, and AAAA, and WAC 173-400-050(5), and that have the capacity to burn less than 35 tons (32 megagrams) per day of municipal solid waste or refuse-derived fuel, if you meet the two requirements in (c)(iii)(B)(I) and (II) of this subsection.

(I) Notify the permitting authority that the unit meets these criteria.

(II) Keep records on a calendar quarter basis of the weight of municipal solid waste burned, and the weight of all other fuels and wastes burned in the unit.

(iv) ~~Medical waste incineration units.~~ Incineration units regulated under 40 C.F.R. Part 60, Subpart Ec (Standards of Performance for Hospital/Medical/Infectious Waste Incinerators for Which Construction

is Commenced After June 20, 1996) (in effect on the date in WAC 173-400-025);

(v) Small power production facilities. Units that meet the three requirements specified in (c)(v)(A) through (C) of this subsection.

(A) The unit qualifies as a small power-production facility under section 3 (17)(C) of the Federal Power Act (16 U.S.C. 796 (17)(C)).

(B) The unit burns homogeneous waste (not including refuse-derived fuel) to produce electricity.

(C) You notify the permitting authority that the unit meets all of these criteria.

(vi) Cogeneration facilities. Units that meet the three requirements specified in (c)(vi)(A) through (C) of this subsection.

(A) The unit qualifies as a cogeneration facility under section 3 (18)(B) of the Federal Power Act (16 U.S.C. 796 (18)(B)).

(B) The unit burns homogeneous waste (not including refuse-derived fuel) to produce electricity and steam or other forms of energy used for industrial, commercial, heating, or cooling purposes.

(C) You notify the permitting authority that the unit meets all of these criteria.

(vii) Hazardous waste combustion units. Units that meet either of the two criteria specified in (c)(vii)(A) or (B) of this subsection.

(A) Units for which you are required to get a permit under section 3005 of the Solid Waste Disposal Act.

(B) Units regulated under 40 C.F.R. Part 63, Subpart EEE (National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors) (in effect on the date in WAC 173-400-025).

(viii) Materials recovery units. Units that combust waste for the primary purpose of recovering metals, such as primary and secondary smelters;

(ix) Air curtain incinerators. Air curtain incinerators that burn only the materials listed in (c)(ix)(A) through (C) of this subsection are only required to meet the requirements under "Air Curtain Incinerators" in 40 C.F.R. 60.2245 through 60.2260 (in effect on the date in WAC 173-400-025).

(A) 100 percent wood waste, as defined in 40 C.F.R. 60.2265.

(B) 100 percent clean lumber.

(C) 100 percent mixture of only wood waste, clean lumber, and/or yard waste, as these terms are defined in 40 C.F.R. 60.2265.

(x) Cyclonic barrel burners. See 40 C.F.R. 60.2265 (in effect on the date in WAC 173-400-025).

(xi) Rack, part, and drum reclamation units. See 40 C.F.R. 60.2265 (in effect on the date in WAC 173-400-025).

(xii) Cement kilns. Kilns regulated under 40 C.F.R. Part 63, Subpart ILL (National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry) (in effect on the date in WAC 173-400-025).

(xiii) Sewage sludge incinerators. Incineration units regulated under 40 C.F.R. Part 60, Subpart O (Standards of Performance for Sewage Treatment Plants) (in effect on the date in WAC 173-400-025).

(xiv) Chemical recovery units. Combustion units burning materials to recover chemical constituents or to produce chemical compounds where there is an existing commercial market for such recovered chemical constituents or compounds. The seven types of units described in (c)(xiv)(A) through (G) of this subsection are considered chemical recovery units.

~~(A) Units burning only pulping liquors (i.e., black liquor) that are reclaimed in a pulping liquor recovery process and reused in the pulping process.~~

~~(B) Units burning only spent sulfuric acid used to produce virgin sulfuric acid.~~

~~(C) Units burning only wood or coal feedstock for the production of charcoal.~~

~~(D) Units burning only manufacturing by-product streams/residues containing catalyst metals which are reclaimed and reused as catalysts or used to produce commercial grade catalysts.~~

~~(E) Units burning only coke to produce purified carbon monoxide that is used as an intermediate in the production of other chemical compounds.~~

~~(F) Units burning only hydrocarbon liquids or solids to produce hydrogen, carbon monoxide, synthesis gas, or other gases for use in other manufacturing processes.~~

~~(G) Units burning only photographic film to recover silver.~~

~~(xv) Laboratory analysis units. Units that burn samples of materials for the purpose of chemical or physical analysis.~~

~~(d) Exceptions.~~

~~(i) Physical or operational changes to a CISWI unit made primarily to comply with this section do not qualify as a "modification" or "reconstruction" (as defined in 40 C.F.R. 60.2815) (in effect on the date in WAC 173-400-025).~~

~~(ii) Changes to a CISWI unit made on or after June 1, 2001, that meet the definition of "modification" or "reconstruction" as defined in 40 C.F.R. 60.2815 (in effect on the date in WAC 173-400-025) mean the CISWI unit is considered a new unit and subject to WAC 173-400-115, which adopts 40 C.F.R. Part 60, Subpart CCCC (in effect on the date in WAC 173-400-025).~~

~~(e) A CISWI unit must comply with 40 C.F.R. 60.2575 through 60.2875 (in effect on the date in WAC 173-400-025). The federal rule contains these major components:~~

~~• Increments of progress towards compliance in 60.2575 through 60.2630;'~~

~~• Waste management plan requirements in 60.2620 through 60.2630;'~~

~~• Operator training and qualification requirements in 60.2635 through 60.2665;~~

~~• Emission limitations and operating limits in 60.2670 through 60.2685;'~~

~~• Performance testing requirements in 60.2690 through 60.2725;'~~

~~• Initial compliance requirements in 60.2700 through 60.2725;'~~

~~• Continuous compliance requirements in 60.2710 through 60.2725;'~~

~~• Monitoring requirements in 60.2730 through 60.2735;'~~

~~• Recordkeeping and reporting requirements in 60.2740 through 60.2800;'~~

~~• Title V operating permits requirements in 60.2805;'~~

~~• Air curtain incinerator requirements in 60.2810 through 60.2870;'~~

~~• Definitions in 60.2875; and'~~

~~• Tables in 60.2875. In Table 1, the final control plan must be submitted before June 1, 2004, and final compliance must be achieved by June 1, 2005.~~

~~(i) Exception to adopting the federal rule. For purposes of this section, "administrator" includes the permitting authority.~~

~~(ii) Exception to adopting the federal rule. For purposes of this section, "you" means the owner or operator.~~

(iii) Exception to adopting the federal rule. For purposes of this section, each reference to "the effective date of state plan approval" means July 1, 2002.

(iv) Exception to adopting the federal rule. The Title V operating permit requirements in 40 C.F.R. 60.2805(a) are not adopted. Each CISWI unit, regardless of whether it is a major or nonmajor unit, is subject to the air operating permit regulation, chapter 173-401 WAC, beginning on July 1, 2002. See WAC 173-401-500 for the permit application requirements and deadlines.

(v) Exception to adopting the federal rule. The following compliance dates apply:

(A) The final control plan (Increment 1) must be submitted no later than July 1, 2003. (See Increment 1 in Table 1.)

(B) Final compliance (Increment 2) must be achieved no later than July 1, 2005. (See Increment 2 in Table 1.)

(5) **Small municipal waste combustion units** constructed on or before August 30, 1999.

(a) Definition. "Municipal waste combustion unit" means any setting or equipment that combusts, liquid, or gasified municipal solid waste including, but not limited to, field-erected combustion units (with or without heat recovery), modular combustion units (starved air- or excess-air), boilers (for example, steam generating units), furnaces (whether suspension-fired, grate-fired, mass-fired, air-curtain incinerators, or fluidized bed-fired), and pyrolysis/combustion units. Two criteria further define municipal waste combustion units:

(i) Municipal waste combustion units do not include the following units:

(A) Pyrolysis or combustion units located at a plastics or rubber recycling unit as specified under the exemptions in this subsection (5)(c)(viii) and (ix).

(B) Cement kilns that combust municipal solid waste as specified under the exemptions in this subsection (5)(c)(x).

(C) Internal combustion engines, gas turbines, or other combustion devices that combust landfill gases collected by landfill gas collection systems.

(ii) The boundaries of a municipal waste combustion unit are defined as follows. The municipal waste combustion unit includes, but is not limited to, the municipal solid waste fuel feed system, grate system, flue gas system, bottom ash system, and the combustion unit water system. The municipal waste combustion unit does not include air pollution control equipment, the stack, water treatment equipment, or the turbine-generator set. The municipal waste combustion unit boundary starts at the municipal solid waste pit or hopper and extends through three areas:

(A) The combustion unit flue gas system, which ends immediately after the heat recovery equipment or, if there is no heat recovery equipment, immediately after the combustion chamber.

(B) The combustion unit bottom ash system, which ends at the truck loading station or similar equipment that transfers the ash to final disposal. It includes all ash handling systems connected to the bottom ash handling system.

(C) The combustion unit water system, which starts at the feed water pump and ends at the piping that exits the steam drum or superheater.

(b) Applicability. This section applies to a municipal waste combustion unit that meets these three criteria:



~~(i) The municipal waste combustion unit has the capacity to combust at least 35 tons per day of municipal solid waste but no more than 250 tons per day of municipal solid waste or refuse-derived fuel.~~

~~(ii) The municipal waste combustion unit commenced construction on or before August 30, 1999.~~

~~(iii) The municipal waste combustion unit is not exempt under (c) of this section.~~

~~(c) Exempted units. The following municipal waste combustion units are exempt from the requirements of this section:~~

~~(i) Small municipal waste combustion units that combust less than 11 tons per day. Units are exempt from this section if four requirements are met:~~

~~(A) The municipal waste combustion unit is subject to a federally enforceable order or order of approval limiting the amount of municipal solid waste combusted to less than 11 tons per day.~~

~~(B) The owner or operator notifies the permitting authority that the unit qualifies for the exemption.~~

~~(C) The owner or operator of the unit sends a copy of the federally enforceable order or order of approval to the permitting authority.~~

~~(D) The owner or operator of the unit keeps daily records of the amount of municipal solid waste combusted.~~

~~(ii) Small power production units. Units are exempt from this section if four requirements are met:~~

~~(A) The unit qualifies as a small power production facility under section 3 (17)(C) of the Federal Power Act (16 U.S.C. 796 (17)(C)).~~

~~(B) The unit combusts homogeneous waste (excluding refuse-derived fuel) to produce electricity.~~

~~(C) The owner or operator notifies the permitting authority that the unit qualifies for the exemption.~~

~~(D) The owner or operator submits documentation to the permitting authority that the unit qualifies for the exemption.~~

~~(iii) Cogeneration units. Units are exempt from this section if four requirements are met:~~

~~(A) The unit qualifies as a small power production facility under section 3 (18)(C) of the Federal Power Act (16 U.S.C. 796 (18)(C)).~~

~~(B) The unit combusts homogeneous waste (excluding refuse-derived fuel) to produce electricity and steam or other forms of energy used for industrial, commercial, heating, or cooling purposes.~~

~~(C) The owner or operator notifies the permitting authority that the unit qualifies for the exemption.~~

~~(D) The owner or operator submits documentation to the permitting authority that the unit qualifies for the exemption.~~

~~(iv) Municipal waste combustion units that combust only tires. Units are exempt from this section if three requirements are met:~~

~~(A) The municipal waste combustion unit combusts a single-item waste stream of tires and no other municipal waste (the unit can co-fire coal, fuel oil, natural gas, or other nonmunicipal solid waste).~~

~~(B) The owner or operator notifies the permitting authority that the unit qualifies for the exemption.~~

~~(C) The owner or operator submits documentation to the permitting authority that the unit qualifies for the exemption.~~

~~(v) Hazardous waste combustion units. Units are exempt from this section if the units have received a permit under section 3005 of the Solid Waste Disposal Act.~~

~~(vi) Materials recovery units. Units are exempt from this section if the units combust waste mainly to recover metals. Primary and secondary smelters may qualify for the exemption.~~

~~(vii) Cofired units. Units are exempt from this section if four requirements are met:~~

~~(A) The unit has a federally enforceable order or order of approval limiting municipal solid waste combustion to no more than 30 percent of total fuel input by weight.~~

~~(B) The owner or operator notifies the permitting authority that the unit qualifies for the exemption.~~

~~(C) The owner or operator submits a copy of the federally enforceable order or order of approval to the permitting authority.~~

~~(D) The owner or operator records the weights, each quarter, of municipal solid waste and of all other fuels combusted.~~

~~(viii) Plastics/rubber recycling units. Units are exempt from this section if four requirements are met:~~

~~(A) The pyrolysis/combustion unit is an integrated part of a plastics/rubber recycling unit as defined in 40 C.F.R. 60.1940 (in effect on the date in WAC 173-400-025).~~

~~(B) The owner or operator of the unit records the weight, each quarter, of plastics, rubber, and rubber tires processed.~~

~~(C) The owner or operator of the unit records the weight, each quarter, of feed stocks produced and marketed from chemical plants and petroleum refineries.~~

~~(D) The owner or operator of the unit keeps the name and address of the purchaser of the feed stocks.~~

~~(ix) Units that combust fuels made from products of plastics/rubber recycling plants. Units are exempt from this section if two requirements are met:~~

~~(A) The unit combusts gasoline, diesel fuel, jet fuel, fuel oils, residual oil, refinery gas, petroleum coke, liquefied petroleum gas, propane, or butane produced by chemical plants or petroleum refineries that use feed stocks produced by plastics/rubber recycling units.~~

~~(B) The unit does not combust any other municipal solid waste.~~

~~(x) Cement kilns. Cement kilns that combust municipal solid waste are exempt.~~

~~(xi) Air curtain incinerators. If an air curtain incinerator as defined under 40 C.F.R. 60.1910 combusts 100 percent yard waste, then those units must only meet the requirements under 40 C.F.R. 60.1910 through 60.1930 (in effect on the date in WAC 173-400-025).~~

~~(d) Exceptions.~~

~~(i) Physical or operational changes to an existing municipal waste combustion unit made primarily to comply with this section do not qualify as a modification or reconstruction, as those terms are defined in 40 C.F.R. 60.1940 (in effect on the date in WAC 173-400-025).~~

~~(ii) Changes to an existing municipal waste combustion unit made on or after June 6, 2001, that meet the definition of modification or reconstruction, as those terms are defined in 40 C.F.R. 60.1940 (in effect on the date in WAC 173-400-025), mean the unit is considered a new unit and subject to WAC 173-400-115, which adopts 40 C.F.R. Part 60, Subpart AAAA (in effect on the date in WAC 173-400-025).~~

~~(e) Municipal waste combustion units are divided into two subcategories based on the aggregate capacity of the municipal waste combustion plant as follows:~~

~~(i) Class I units. Class I units are small municipal waste combustion units that are located at municipal waste combustion plants~~

with an aggregate plant combustion capacity greater than 250 tons per day of municipal solid waste. See the definition of "municipal waste combustion plant capacity" in 40 C.F.R. 60.1940 (in effect on the date in WAC 173-400-025) for the specification of which units are included in the aggregate capacity calculation.

(ii) Class II units. Class II units are small municipal waste combustion units that are located at municipal waste combustion plants with an aggregate plant combustion capacity less than or equal to 250 tons per day of municipal solid waste. See the definition of "municipal waste combustion plant capacity" in 40 C.F.R. 60.1940 (in effect on the date in WAC 173-400-025) for the specification of which units are included in the aggregate capacity calculation.

(f) Compliance option 1.

(i) A municipal solid waste combustion unit may choose to reduce, by the final compliance date of June 1, 2005, the maximum combustion capacity of the unit to less than 35 tons per day of municipal solid waste. The owner or operator must submit a final control plan and the notifications of achievement of increments of progress as specified in 40 C.F.R. 60.1610 (in effect on the date in WAC 173-400-025).

(ii) The final control plan must, at a minimum, include two items:

(A) A description of the physical changes that will be made to accomplish the reduction.

(B) Calculations of the current maximum combustion capacity and the planned maximum combustion capacity after the reduction. Use the equations specified in 40 C.F.R. 60.1935 (d) and (e) (in effect on the date in WAC 173-400-025) to calculate the combustion capacity of a municipal waste combustion unit.

(iii) An order or order of approval containing a restriction or a change in the method of operation does not qualify as a reduction in capacity. Use the equations specified in 40 C.F.R. 60.1935 (d) and (e) (in effect on the date in WAC 173-400-025) to calculate the combustion capacity of a municipal waste combustion unit.

(g) Compliance option 2. The municipal waste combustion unit must comply with 40 C.F.R. 60.1585 through 60.1905, and 60.1935 (in effect on the date in WAC 173-400-025).

(i) The rule contains these major components:

(A) Increments of progress towards compliance in 60.1585 through 60.1640;

(B) Good combustion practices - Operator training in 60.1645 through 60.1670;

(C) Good combustion practices - Operator certification in 60.1675 through 60.1685;

(D) Good combustion practices - Operating requirements in 60.1690 through 60.1695;

(E) Emission limits in 60.1700 through 60.1710;

(F) Continuous emission monitoring in 60.1715 through 60.1770;

(G) Stack testing in 60.1775 through 60.1800;

(H) Other monitoring requirements in 60.1805 through 60.1825;

(I) Recordkeeping reporting in 60.1830 through 60.1855;

(J) Reporting in 60.1860 through 60.1905;

(K) Equations in 60.1935;

(L) Tables 2 through 8.

(ii) Exception to adopting the federal rule. For purposes of this section, each reference to the following is amended in the following manner:

(A) "State plan" in the federal rule means WAC 173-400-050(5).

~~(B) "You" in the federal rule means the owner or operator~~  
~~(C) "Administrator" includes the permitting authority~~  
~~(D) "The effective date of the state plan approval" in the federal rule means December 6, 2002~~  
~~(h) Compliance schedule~~  
~~(i) Small municipal waste combustion units must achieve final compliance or cease operation not later than December 1, 2005~~  
~~(ii) Small municipal waste combustion units must achieve compliance by May 6, 2005 for all Class II units, and by November 6, 2005 for all Class I units~~  
~~(iii) Class I units must comply with these additional requirements:~~  
~~(A) The owner or operator must submit the dioxins/furans stack test results for at least one test conducted during or after 1990. The stack test must have been conducted according to the procedures specified under 40 C.F.R. 60.1790 (in effect on the date in WAC 173-400-025)~~  
~~(B) Class I units that commenced construction after June 26, 1987, must comply with the dioxins/furans and mercury limits specified in Tables 2 and 3 in 40 C.F.R. Part 60, Subpart BBBB (in effect on the date in WAC 173-400-025) by the later of two dates:~~  
~~(I) December 6, 2003; or~~  
~~(II) One year following the issuance of an order of approval (revised construction approval or operation permit) if an order or order of approval or operation modification is required~~  
~~(i) Air operating permit. Applicability to chapter 173-401 WAC, the air operating permit regulation, begins on July 1, 2002. See WAC 173-401-500 for the permit application requirements and deadlines~~  
~~(6) **Hazardous/medical/infectious waste incinerators** constructed on or before December 1, 2008. Hospital/medical/infectious waste incinerators constructed on or before December 1, 2008, must comply with the requirements in 40 C.F.R. Part 62, Subpart HHH (in effect on the date in WAC 173-400-025)~~

[Statutory Authority: Chapter 70.94 RCW. WSR 18-17-111 (Order 15-07), § 173-400-050, filed 8/16/18, effective 9/16/18. Statutory Authority: RCW 70.94.152, 70.94.331, 70.94.860. WSR 16-12-099 (Order 16-01), § 173-400-050, filed 5/31/16, effective 7/1/16. Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-050, filed 11/28/12, effective 12/29/12; WSR 11-06-060 (Order 09-01), § 173-400-050, filed 3/1/11, effective 4/1/11. Statutory Authority: RCW 70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-050, filed 1/10/05, effective 2/10/05. Statutory Authority: Chapter 70.94 RCW, RCW 70.94.141, [70.94.]152, [70.94.]331, [70.94.]510 and 43.21A.080. WSR 01-17-062 (Order 99-06), § 173-400-050, filed 8/15/01, effective 9/15/01. Statutory Authority: Chapter 70.94 RCW. WSR 91-05-064 (Order 90-06), § 173-400-050, filed 2/19/91, effective 3/22/91. Statutory Authority: Chapters 43.21A and 70.94 RCW. WSR 83-09-036 (Order DE 83-13), § 173-400-050, filed 4/15/83. Statutory Authority: RCW 70.94.331. WSR 80-11-059 (Order DE 80-14), § 173-400-050, filed 8/20/80. Statutory Authority: RCW 43.21A.080 and 70.94.331. WSR 79-06-012 (Order DE 78-21), § 173-400-050, filed 5/8/79; Order DE 76-38, § 173-400-050, filed 12/21/76. Formerly WAC 18-04-050.]

**EPA effective: 3/25/20 (85 FR 10301, 2/24/20)**

**WAC 173-400-060 Emission standards for general process units.**  
 General process units are required to meet all applicable provisions

of WAC 173-400-040 and, no person shall cause or allow the emission of particulate material from any general process operation in excess of 0.23 grams per dry cubic meter at standard conditions (0.1 grain/dscf) of exhaust gas. Test methods from 40 C.F.R. Parts 51, 60, 61, and 63 (in effect on the date in WAC 173-400-025) and any other approved test procedures in ecology's "*Source Test Manual - Procedures For Compliance Testing*" as of September 20, 2004, must be used to determine compliance.

[Statutory Authority: Chapter 70.94 RCW, RCW 70.94.151, 70.94.153, and 70.94.892. WSR 18-22-006 (Order 16-09), § 173-400-060, filed 10/25/18, effective 11/25/18. Statutory Authority: RCW 70.94.152, 70.94.331, 70.94.860. WSR 16-12-099 (Order 16-01), § 173-400-060, filed 5/31/16, effective 7/1/16. Statutory Authority: RCW 70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-060, filed 1/10/05, effective 2/10/05. Statutory Authority: Chapter 70.94 RCW, RCW 70.94.141, [70.94.]152, [70.94.]331, [70.94.]510 and 43.21A.080. WSR 01-17-062 (Order 99-06), § 173-400-060, filed 8/15/01, effective 9/15/01. Statutory Authority: [RCW 70.94.331, 70.94.510 and chapter 70.94 RCW.] WSR 00-23-130 (Order 98-27), § 173-400-060, filed 11/22/00, effective 12/23/00. Statutory Authority: RCW 70.94.860, 70.94.510 and 70.94.331. WSR 98-15-129 (Order 98-04), § 173-400-060, filed 7/21/98, effective 8/21/98. Statutory Authority: Chapter 70.94 RCW. WSR 91-05-064 (Order 90-06), § 173-400-060, filed 2/19/91, effective 3/22/91. Statutory Authority: Chapters 43.21A and 70.94 RCW. WSR 83-09-036 (Order DE 83-13), § 173-400-060, filed 4/15/83. Statutory Authority: RCW 70.94.331. WSR 80-11-059 (Order DE 80-14), § 173-400-060, filed 8/20/80; Order DE 76-38, § 173-400-060, filed 12/21/76. Formerly WAC 18-04-060.]

EPA effective: 3/25/20 (85 FR 10301, 2/24/20)

~~(i) Air operating permit. Applicability to chapter 173-401 WAC, the air operating permit regulation, begins on July 1, 2002. See WAC 173-401-500 for the permit application requirements and deadlines.~~

~~(6) Hazardous/medical/infectious waste incinerators constructed on or before December 1, 2008. Hospital/medical/infectious waste incinerators constructed on or before December 1, 2008, must comply with the requirements in 40 C.F.R. Part 62, subpart HHHH (in effect on the date in WAC 173-400-025).~~

~~State effective: 07/01/16; EPA effective: 11/07/16 (81 FR 69385, October 6, 2016)~~

### **~~173-400-060 Emission Standards for General Process Units.~~**

~~General process units are required to meet all applicable provisions of WAC 173-400-040 and, no person shall cause or allow the emission of particulate material from any general process operation in excess of 0.23 grams per dry cubic meter at standard conditions (0.1 grain/dscf) of exhaust gas. Test methods (in effect on the date in WAC 173-400-025) from 40 C.F.R. Parts 51, 60, 61, and 63 and any other approved test procedures in ecology's "Source Test Manual—Procedures For Compliance Testing" as of September 20, 2004, will be used to determine compliance.~~

~~State effective: 07/01/16; EPA effective: 11/07/16 (81 FR 69385, October 6, 2016)~~

### **~~173-400-070 Emission Standards for Certain Source Categories.~~**

Ecology finds that the reasonable regulation of sources within certain categories requires separate standards applicable to such categories. The standards set forth in this section shall be the maximum allowable standards for emissions units within the categories listed. Except as specifically provided in this section, such emissions units shall not be required to meet the provisions of WAC 173-400-040, 173-400-050 and 173-400-060.

#### **(1) Wigwam and silo burners.**

(a) All wigwam and silo burners designed to dispose of wood waste must meet all provisions of WAC 173-400-040 (3), (4), (5), (6), (7), (8), and WAC 173-400-050(4) or 173-400-115 (40 C.F.R. Part 60, subpart DDDD in effect on the date in WAC 173-400-025) as applicable.

(b) All wigwam and silo burners must use RACT. All emissions units shall be operated and maintained to minimize emissions. These requirements may include a controlled tangential vent overfire air system, an adequate underfire system, elimination of all unnecessary openings, a

controlled feed and other modifications determined necessary by ecology or the permitting authority.

(c) It shall be unlawful to install or increase the existing use of any burner that does not meet all requirements for new sources including those requirements specified in WAC 173-400-040 and 173-400-050, except operating hours.

(d) The permit authority may establish additional requirements for wigwam and silo burners. These requirements may include, but shall not be limited to:

(i) A requirement to meet all provisions of WAC 173-400-040 and 173-400-050. Wigwam and silo burners will be considered to be in compliance if they meet the requirements contained in WAC 173-400-040(2), visible emissions. An exception is made for a startup period not to exceed thirty minutes in any eight consecutive hours.

(ii) A requirement to apply BACT.

(iii) A requirement to reduce or eliminate emissions if ecology establishes that such emissions unreasonably interfere with the use and enjoyment of the property of others or are a cause of violation of ambient air standards.

(2) Hog fuel boilers.

(a) Hog fuel boilers shall meet all provisions of WAC 173-400-040 and 173-400-050(1), except that emissions may exceed twenty percent opacity for up to fifteen consecutive minutes once in any eight hours. The intent of this provision is to allow soot blowing and grate cleaning necessary to the operation of these units. This practice is to be scheduled for the same specific times each day and the permitting authority shall be notified of the schedule or any changes.

(b) All hog fuel boilers shall utilize RACT and shall be operated and maintained to minimize emissions.

(3) Orchard heating.

(a) Burning of rubber materials, asphaltic products, crankcase oil or petroleum wastes, plastic, or garbage is prohibited.

(b) It is unlawful to burn any material or operate any orchard-heating device that causes a visible emission exceeding twenty percent opacity, except during the first thirty minutes after such device or material is ignited.

(4) Grain elevators.

Any grain elevator which is primarily classified as a materials handling operation shall meet all the provisions of WAC 173-400-040 (2), (3), (4), and (5).



(5) Catalytic cracking units.

(a) All existing catalytic cracking units shall meet all provisions of WAC 173-400-040 (2), (3), (4), (5), (6), and (7) and:

(i) No person shall cause or allow the emission for more than three minutes, in any one hour, of an air contaminant from any catalytic cracking unit which at the emission point, or within a reasonable distance of the emission point, exceeds forty percent opacity.

(ii) No person shall cause or allow the emission of particulate material in excess of 0.46 grams per dry cubic meter at standard conditions (0.20 grains/dscf) of exhaust gas.

(b) All new catalytic cracking units shall meet all provisions of WAC 173-400-115.

(6) Other wood waste burners.

(a) Wood waste burners not specifically provided for in this section shall meet all applicable provisions of WAC 173-400-040. In addition, wood waste burners subject to WAC 173-400-050(4) or 173-400-115 (40 C.F.R. Part 60 subpart DDDD in effect on the date in WAC 173-400-025) must meet all applicable provisions of those sections.

(b) Such wood waste burners shall utilize RACT and shall be operated and maintained to minimize emissions.

~~—(7) Sulfuric acid plants.~~

~~—No person shall cause to be discharged into the atmosphere from a sulfuric acid plant, any gases which contain acid mist, expressed as H<sub>2</sub>SO<sub>4</sub>, in excess of 0.15 pounds per ton of acid produced. Sulfuric acid production shall be expressed as one hundred percent H<sub>2</sub>SO<sub>4</sub>.~~

~~(8) Municipal solid waste landfills constructed, reconstructed, or modified before May 30, 1991. A municipal solid waste landfill (MSW landfill) is an entire disposal facility in a contiguous geographical space where household waste is placed in or on the land. A MSW landfill may also receive other types of waste regulated under Subtitle D of the Federal Resource Conservation and Recovery Act including the following: Commercial solid waste, nonhazardous sludge, conditionally exempt small quantity generator waste, and industrial solid waste. Portions of an MSW landfill may be separated by access roads. A MSW landfill may be either publicly or privately owned. A MSW landfill may be a new MSW landfill, an existing MSW landfill, or a lateral expansion. All references in this subsection to 40 C.F.R. Part 60 rules mean those rules in effect on the date in WAC 173-400-025.~~

~~(a) Applicability. These rules apply to each MSW landfill constructed, reconstructed, or modified before May 30, 1991; and the MSW landfill accepted waste at any time since November 8, 1987 or the landfill has additional capacity for future waste deposition. (See WAC~~

~~173-400-115 for the requirements for MSW landfills constructed, reconstructed, or modified on or after May 30, 1991.) Terms in this subsection have the meaning given them in 40 C.F.R. 60.751, except that every use of the word "administrator" in the federal rules referred to in this subsection includes the "permitting authority."~~

~~(b) Exceptions. Any physical or operational change to an MSW landfill made solely to comply with these rules is not considered a modification or rebuilding.~~

~~(c) Standards for MSW landfill emissions:~~

~~(i) A MSW landfill having a design capacity less than 2.5 million megagrams or 2.5 million cubic meters must comply with the requirements of 40 C.F.R. 60.752(a) in addition to the applicable requirements specified in this section.~~

~~(ii) A MSW landfill having design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters must comply with the requirements of 40 C.F.R. 60.752(b) in addition to the applicable requirements specified in this section.~~

~~(d) Recordkeeping and reporting. A MSW landfill must follow the recordkeeping and reporting requirements in 40 C.F.R. 60.757 (submittal of an initial design capacity report) and 40 C.F.R. 60.758 (recordkeeping requirements), as applicable, except as provided for under (d)(i) and (ii).~~

~~(i) The initial design capacity report for the facility is due before September 20, 2001.~~

~~(ii) The initial nonmethane organic compound (NMOC) emissions rate report is due before September 20, 2001.~~

~~(e) Test methods and procedures:~~

~~(i) A MSW landfill having a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters must calculate the landfill nonmethane organic compound emission rates following the procedures listed in 40 C.F.R. 60.754, as applicable, to determine whether the rate equals or exceeds 50 megagrams per year.~~

~~(ii) Gas collection and control systems must meet the requirements in 40 C.F.R. 60.752 (b)(2)(ii) through the following procedures:~~

~~(A) The systems must follow the operational standards in 40 C.F.R. 60.753.~~

~~(B) The systems must follow the compliance provisions in 40 C.F.R. 60.755 (a)(1) through (a)(6)~~

~~to determine whether the system is in compliance with 40 C.F.R. 60.752 (b)(2)(ii).~~

~~(C) The system must follow the applicable monitoring provisions in 40 C.F.R. 60.756.~~

~~(f) Conditions. Existing MSW landfills that meet the following conditions must install a gas collection and control system:~~

~~(i) The landfill accepted waste at any time since November 8, 1987, or the landfill has additional design capacity available for future waste deposition;~~

~~(ii) The landfill has design capacity greater than or equal to 2.5 million megagrams or 2.5 million cubic meters. The landfill may calculate design capacity in either megagrams or cubic meters for comparison with the exception values. Any density conversions shall be documented and submitted with the report; and~~

~~(iii) The landfill has a nonmethane organic compound (NMOC) emission rate of 50 megagrams per year or greater.~~

~~(g) Change in conditions. After the adoption date of this rule, a landfill that meets all three conditions in (e) of this subsection must comply with all the requirements of this section within thirty months of the date when the conditions were met. This change will usually occur because the NMOC emission rate equaled or exceeded the rate of 50 megagrams per year.~~

~~(h) Gas collection and control systems.~~

~~(i) Gas collection and control systems must meet the requirements in 40 C.F.R. 60.752 (b)(2)(ii).~~

~~(ii) The design plans must be prepared by a licensed professional engineer and submitted to the permitting authority within one year after the adoption date of this section.~~

~~(iii) The system must be installed within eighteen months after the submittal of the design plans.~~

~~(iv) The system must be operational within thirty months after the adoption date of this section.~~

~~(v) The emissions that are collected must be controlled in one of three ways:~~

~~(A) An open flare designed and operated according to 40 C.F.R. 60.18;~~

~~(B) A control system designed and operated to reduce NMOC by 98 percent by weight; or~~

~~(C) An enclosed combustor designed and operated to reduce the outlet NMOC concentration to 20 parts per million as hexane by volume, dry basis to three percent oxygen, or less.~~

~~(i) Air operating permit.~~

~~(i) A MSW landfill that has a design capacity less than 2.5 million megagrams or 2.5 million cubic meters on January 7, 2000, is not subject to the air operating permit regulation, unless the landfill is subject to chapter 173-401 WAC for some other reason. If the design capacity of an exempted MSW landfill subsequently increases to equal or exceed 2.5 million megagrams or 2.5 million cubic meters by a change that is not a modification or reconstruction, the landfill is subject to chapter 173-401 WAC on the date the amended design capacity report is due.~~

~~(ii) A MSW landfill that has a design capacity equal to or greater than 2.5 million megagrams or 2.5 million cubic meters on January 7, 2000, is subject to chapter 173-401 WAC beginning on the effective date of this section. (Note: Under 40 C.F.R. 62.14352(e), an applicable MSW landfill must have submitted its application so that by April 6, 2001, the permitting authority was able to determine that it was timely and complete. Under 40 C.F.R. 70.7(b), no source may operate after the time that it is required to submit a timely and complete application.)~~

~~(iii) When a MSW landfill is closed, the owner or operator is no longer subject to the requirement to maintain an operating permit for the landfill if the landfill is not subject to chapter 173-401 WAC for some other reason and if either of the following conditions are met:~~

~~(A) The landfill was never subject to the requirement for a control system under 40 C.F.R. 62.14353; or~~

~~(B) The landfill meets the conditions for control system removal specified in 40 C.F.R. 60.752 (b)(2)(v).~~

*State effective: 07/01/16; EPA effective: 11/07/16 (81 FR 69385, October 6, 2016)*

### **173-400-081 Startup and Shutdown.**

(1) In promulgating technology-based emission standards and making control technology determinations (e.g., BACT, RACT, LAER, BART) the permitting authorities will consider any physical constraints on the ability of a source to comply with the applicable standard during startup or shutdown.

(2) Where the permitting authority determines that the source or source category, when operated and maintained in accordance with good air pollution control practice, is not capable of

achieving continuous compliance with an emission standard during startup or shutdown, the permitting authority must include in the standard appropriate emission limitations, operating parameters, or other criteria to regulate the performance of the source during startup or shutdown conditions.

(3) In modeling the emissions of a source for purposes of demonstrating attainment or maintenance of national ambient air quality standards, the permitting authorities shall take into account any incremental increase in allowable emissions under startup or shutdown conditions authorized by an emission limitation or other operating parameter adopted under this rule.

(4) Any emission limitation or other parameter adopted under this rule which increases allowable emissions during startup or shutdown conditions over levels authorized in Washington's state implementation plan shall not take effect until approved by EPA as a SIP amendment.

*State effective: 4/1/11; EPA effective: 11/3/14*

|                      |
|----------------------|
| 79 FR 59653, 10/3/14 |
|----------------------|

(e) Monitoring, recordkeeping and reporting requirements sufficient to ensure that the source complies with each condition in the order.

(6) Fees. A permitting authority may assess and collect fees for processing the request for an alternative emission limit according to its fee schedule for processing a permit application.

[Statutory Authority: Chapter 70.94 RCW. WSR 18-17-111 (Order 15-07), § 173-400-082, filed 8/16/18, effective 9/16/18.]

**WAC 173-400-091 Voluntary limits on emissions.** (1) Upon request by the owner or operator of a new or existing source or stationary source, the permitting authority with jurisdiction over the source shall issue a regulatory order that limits the potential to emit any air contaminant or contaminants to a level agreed to by the owner or operator and the permitting authority with jurisdiction.

(2) A condition contained in an order issued under this section shall be less than the source's or stationary source's otherwise allowable annual emissions of a particular contaminant under all applicable requirements of the chapter 70.94 RCW and the FCAA, including any standard or other requirement provided for in the Washington state implementation plan. The term "condition" refers to limits on production or other limitations, in addition to emission limitations.

(3) Any order issued under this section shall include monitoring, recordkeeping and reporting requirements sufficient to ensure that the source or stationary source complies with any condition established under this section. Monitoring requirements shall use terms, test methods, units, averaging periods, and other statistical conventions consistent with the requirements of WAC 173-400-105.

(4) Any order issued under this section must comply with WAC 173-400-171.

(5) The terms and conditions of a regulatory order issued under this section are enforceable. Any proposed deviation from a condition contained in an order issued under this section shall require revision or revocation of the order.

[Statutory Authority: Chapter 70.94 RCW. WSR 11-06-060 (Order 09-01), § 173-400-091, filed 3/1/11, effective 4/1/11; WSR 93-18-007 (Order 93-03), § 173-400-091, filed 8/20/93, effective 9/20/93.]

**EPA effective: 11/3/14 (79 FR 59653, 10/3/14)**

**WAC 173-400-099 Registration program.** (1) Program purpose.

(a) The registration program is a program to develop and maintain a current and accurate record of air contaminant sources. Information collected through the registration program is used to evaluate the effectiveness of air pollution control strategies and to verify source compliance with applicable air pollution requirements.

(b) Permit program sources, as defined in RCW 70.94.030(18), are not required to comply with the registration requirements of WAC 173-400-100 through 173-400-104.

(2) Program components. The components of the registration program consist of:

(a) Initial registration and annual or other periodic reports from stationary source owners providing information on location, size, height of contaminant outlets, processes employed, nature and quantity of the air contaminant emissions, and other information that is rele-

filed 1/10/05, effective 2/10/05 Statutory Authority: [RCW 70.94.331, 70.94.510 and chapter 70.94 RCW] WSR 00-23-130 (Order 98-27), § 173-400-104, filed 11/22/00, effective 12/23/00 Statutory Authority: Chapter 70.94 RCW WSR 95-07-126 (Order 93-40), § 173-400-104, filed 3/22/95, effective 4/22/95.]

**WAC 173-400-105 Records, monitoring, and reporting.** The owner or operator of a source must upon notification by ecology, maintain records on the type and quantity of emissions from the source and other information deemed necessary to determine whether the source is in compliance with applicable emission limitations and control measures.

(1) **Emission inventory.** The owner and operator of an air contaminant source must submit an inventory of emissions from the source each year. The inventory must include stack and fugitive emissions of particulate matter, PM-10, PM-2.5, sulfur dioxide, oxides of nitrogen, carbon monoxide, total reduced sulfur compounds (TRS), fluorides, lead, VOCs, ammonia, and other contaminants. Sources must provide registration information in a manner prescribed by the permitting authority for the submittal of these inventories. When the permitting authority requests emission inventory information for a calendar year, the owner or operator must submit the emissions inventory no later than April 15th after the end of the calendar year for which the emissions inventory was requested. If April 15th falls on a weekend, then the deadline to file shall be the next business day. The owner and operator must maintain records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards. The owner or operator may base emission estimates used in the inventory on the most recent published EPA emission factors for a source category, or other information available to the owner and operator, whichever is the better estimate.

(2) **Monitoring.** Ecology must conduct a continuous surveillance program to monitor the quality of the ambient atmosphere as to concentrations and movements of air contaminants. As a part of this program, the director of ecology or an authorized representative may require any source under the jurisdiction of ecology to conduct stack and/or ambient air monitoring and to report the results to ecology.

(3) **Investigation of conditions.** Upon presentation of appropriate credentials, for the purpose of investigating conditions specific to the control, recovery, or release of air contaminants into the atmosphere, personnel from ecology or an authority must have the power to enter at reasonable times upon any private or public property, excepting nonmultiple unit private dwellings housing one or two families.

(4) **Source testing.** To demonstrate compliance, the permitting authority may conduct or require that the owner or operator of a source conduct a test using approved test methods from 40 C.F.R. Parts 51, 60, 61, 62, 63, 75 and 1065, as applicable (in effect on the date in WAC 173-400-025) or procedures contained in "*Source Test Manual - Procedures for Compliance Testing*," state of Washington, department of ecology, as of September 20, 2004, on file at ecology. The permitting authority may require the operator of a source to provide the necessary platform and sampling ports for ecology personnel or others to perform a test of an emissions unit. The source owner or operator must allow the permitting authority to obtain a sample from any emissions unit. The permitting authority shall give the operator of the source an opportunity to observe the sampling and to obtain a sample at the same time.



(5) **Continuous monitoring and recording.** Owners and operators of the following categories of sources must install, calibrate, maintain and operate equipment for continuously monitoring and recording those emissions specified.

(a) Fossil fuel-fired steam generators.

(i) Opacity, except where:

(A) Steam generator capacity is less than two hundred fifty million BTU per hour heat input; or

(B) Only gaseous fuel is burned.

(ii) Sulfur dioxide, except where steam generator capacity is less than two hundred fifty million BTU per hour heat input or if sulfur dioxide control equipment is not required.

(iii) Percent oxygen or carbon dioxide where such measurements are necessary for the conversion of sulfur dioxide continuous emission monitoring data.

(iv) General exception. These requirements do not apply to a fossil fuel-fired steam generator with an annual average capacity factor of less than thirty percent, as reported to the Federal Power Commission for calendar year 1974, or as otherwise demonstrated to ecology or the authority by the owner(s) or operator(s).

(b) **Sulfuric acid plants.** Sulfur dioxide where production capacity is more than three hundred tons per day, expressed as one hundred percent acid, except for those facilities where conversion to sulfuric acid is used primarily as a means of preventing emissions to the atmosphere of sulfur dioxide or other sulfur compounds.

(c) Fluid bed catalytic cracking units catalyst regenerators at petroleum refineries. Opacity where fresh feed capacity is more than twenty thousand barrels per day.

(d) Wood residue fuel-fired steam generators.

(i) Opacity, except where steam generator capacity is less than one hundred million BTU per hour heat input.

(ii) Continuous monitoring equipment. The requirements of (e) of this subsection do not apply to wood residue fuel-fired steam generators, but continuous monitoring equipment required by (d) of this subsection must be subject to approval by ecology.

(e) Owners and operators of those sources required to install continuous monitoring equipment under this subsection must demonstrate to ecology or the authority, compliance with the equipment and performance specifications and observe the reporting requirements contained in 40 C.F.R. Part 51, Appendix P, Sections 3, 4 and 5 (in effect on the date in WAC 173-400-025).

(f) Special considerations. If for reason of physical plant limitations or extreme economic situations, ecology determines that continuous monitoring is not a reasonable requirement, the permitting authority will establish alternative monitoring and reporting procedures on an individual basis. These will generally take the form of stack tests conducted at a frequency sufficient to establish the emission levels over time and to monitor deviations in these levels.

(g) Exemptions. This subsection (5) does not apply to any emission unit which is:

(i) Required to continuously monitor emissions due to a standard or requirement contained in 40 C.F.R. Parts 60, 61, 62, 63, or 75 (all in effect on the date in WAC 173-400-025) or a permitting authority's adoption by reference of the federal standards. Emission units and sources subject to those standards must comply with the data collection requirements that apply to those standards.

(ii) Not subject to an applicable emission standard.

(6) No person shall make any false material statement, representation or certification in any form, notice or report required under chapter 70.94 or 70.120 RCW, or any ordinance, resolution, regulation, permit or order in force pursuant thereto.

(7) Continuous emission monitoring system operating requirements. All continuous emission monitoring systems (CEMS) required by 40 C.F.R. Parts 60, 61, 62, 63, or 75 (all in effect on the date in WAC 173-400-025), or a permitting authority's adoption of those federal standards must meet the continuous emission monitoring systems (CEMS) performance specifications and data recovery requirements imposed by those standards. All CEMS required under an order, PSD permit, or regulation issued by a permitting authority and not subject to CEMS performance specifications and data recovery requirements imposed by 40 C.F.R. Parts 60, 61, 62, 63, or 75 must follow the continuous emission monitoring rule of the permitting authority, or if the permitting authority does not have a continuous emission monitoring rule, must meet the following requirements:

(a) The owner or operator must recover valid hourly monitoring data for at least ninety-five percent of the hours that the equipment (required to be monitored) is operated during each calendar month except for periods of monitoring system downtime, provided that the owner or operator demonstrated that the downtime was not a result of inadequate design, operation, or maintenance, or any other reasonably preventable condition, and the source conducts any necessary repairs to the monitoring system in a timely manner.

Note: This means that a continuous emissions monitor (CEM) must provide valid data for all but thirty-six hours for each month (ninety-five percent standard).

(b) The owner or operator must install a continuous emission monitoring system that meets the performance specification in 40 C.F.R. Part 60, Appendix B in effect at the time of its installation, and must operate this monitoring system in accordance with the quality assurance procedures in Appendix F of 40 C.F.R. Part 60 (in effect on the date in WAC 173-400-025), and EPA's "Recommended Quality Assurance Procedures for Opacity Continuous Monitoring Systems" (EPA) 340/1-86-010.

(c) An owner or operator must reduce monitoring data commencing on the clock hour and containing at least forty-five minutes of monitoring data to one hour averages. An owner or operator must reduce monitoring data for opacity six minute block averages unless otherwise specified in the order of approval or permit. An owner or operator must include all monitoring data in these averages except for data collected during calibration drift tests and cylinder gas audits, and for data collected subsequent to a failed quality assurance test or audit. After a failed quality assurance test or audit, a source must collect no valid data until the monitoring system passes a quality assurance test or audit.

(d) An owner or operator must maintain continuous operation of all continuous monitoring systems except for instances of system breakdowns, repairs, calibration checks, and zero and span adjustments required under (a) of this subsection.

(i) Continuous monitoring systems for measuring opacity shall complete a minimum of one cycle of sampling and analyzing for each successive ten second period and one cycle of data recording for each successive six minute period.

(ii) Continuous monitoring systems for measuring emissions other than opacity must complete a minimum of one cycle of sampling, analyzing, and recording for each successive fifteen minute period.

(e) The owner or operator must retain all monitoring data averages for at least five years, including copies of all reports submitted to the permitting authority and records of all repairs, adjustments, and maintenance performed on the monitoring system.

(f) The owner or operator must submit a monthly report (or other frequency as directed by terms of an order, air operating permit or regulation) to the permitting authority within thirty days after the end of the month (or other specified reporting period) in which the owner or operator recorded the data. The owner or operator may combine the report required by this section with any excess emission report required by WAC 173-400-108. This report must include:

(i) The number of hours that the monitored emission unit operated each month and the number of valid hours of monitoring data that the monitoring system recovered each month;

(ii) The date, time period, and cause of each failure to meet the data recovery requirements of (a) of this subsection and any actions taken to ensure adequate collection of such data;

(iii) The date, time period, and cause of each failure to recover valid hourly monitoring data for at least ninety percent of the hours that the equipment (required to be monitored) was operated each day;

Note: A continuous emissions monitor (CEM) must provide valid data for all but two hours per day (ninety percent standard).

(iv) The results of all cylinder gas audits conducted during the month; and

(v) A certification of truth, accuracy, and completeness signed by an authorized representative of the owner or operator.

(8) No person shall render inaccurate any monitoring device or method required under chapter 70.94 or 70.120 RCW, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto.

[Statutory Authority: Chapter 70.94 RCW, RCW 70.94.151, 70.94.153, and 70.94.892. WSR 18-22-006 (Order 16-09), § 173-400-105, filed 10/25/18, effective 11/25/18. Statutory Authority: RCW 70.94.152, 70.94.331, 70.94.860. WSR 16-12-099 (Order 16-01), § 173-400-105, filed 5/31/16, effective 7/1/16. Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-105, filed 11/28/12, effective 12/29/12; WSR 11-06-060 (Order 09-01), § 173-400-105, filed 3/1/11, effective 4/1/11. Statutory Authority: RCW 70.94.395 and 70.94.331. WSR 07-11-039 (Order 06-03), § 173-400-105, filed 5/8/07, effective 6/8/07. Statutory Authority: RCW 70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-105, filed 1/10/05, effective 2/10/05. Statutory Authority: Chapter 70.94 RCW, RCW 70.94.141, [70.94.]152, [70.94.]331, [70.94.]510 and 43.21A.080. WSR 01-17-062 (Order 99-06), § 173-400-105, filed 8/15/01, effective 9/15/01. Statutory Authority: RCW 70.94.860, 70.94.510 and 70.94.331. WSR 98-15-129 (Order 98-04), § 173-400-105, filed 7/21/98, effective 8/21/98. Statutory Authority: Chapter 70.94 RCW. WSR 96-19-054 (Order 94-35), § 173-400-105, filed 9/13/96, effective 10/14/96; WSR 93-18-007 (Order 93-03), § 173-400-105, filed 8/20/93, effective 9/20/93; WSR 91-05-064 (Order 90-06), § 173-400-105, filed 2/19/91, effective 3/22/91; WSR 87-20-019 (Order 87-12), § 173-400-105, filed 9/30/87.]

EPA effective: 3/25/20 (85 FR 10301, 2/24/20)

~~WAC 173-400-107 Excess emissions. This section is in effect until the effective date of EPA's removal of the September 20, 1993, version of this section from the SIP. This section is not effective starting on that date.~~

~~(iii) The date, time period, and cause of each failure to recover valid hourly monitoring data for at least 90 percent of the hours that the equipment (required to be monitored) was operated each day;~~

~~(iv) The results of all cylinder gas audits conducted during the month; and~~

~~(v) A certification of truth, accuracy, and completeness signed by an authorized representative of the owner or operator.~~

~~(8) No person shall render inaccurate any monitoring device or method required under chapter 70.94 or 70.120 RCW, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto.~~

~~State effective: 07/01/16; EPA effective: 11/07/16 (81 FR 69385, October 6, 2016)~~

### **173-400-107 Excess Emissions.**

(1) The owner or operator of a source shall have the burden of proving to ecology or the authority or the decision-making authority in an enforcement action that excess emissions were unavoidable. This demonstration shall be a condition to obtaining relief under subsections (4), (5) and (6) of this section.

(2) Excess emissions determined to be unavoidable under the procedures and criteria in this section shall be excused and not subject to penalty.

(3) Excess emissions which represent a potential threat to human health or safety or which the owner or operator of the source believes to be unavoidable shall be reported to ecology or the authority as soon as possible. Other excess emissions shall be reported within thirty days after the end of the month during which the event occurred or as part of the routine emission monitoring reports. Upon request by ecology or the authority, the owner(s) or operator(s) of the source(s) shall submit a full written report including the known causes, the corrective actions taken, and the preventive measures to be taken to minimize or eliminate the chance of recurrence.

(4) Excess emissions due to startup or shutdown conditions shall be considered unavoidable provided the source reports as required under subsection (3) of this section and adequately demonstrates that the excess emissions could not have been prevented through careful planning and design and if a bypass of control equipment occurs, that such bypass is necessary to prevent loss of life, personal injury, or severe property damage.

(5) Maintenance. Excess emissions due to scheduled maintenance shall be considered unavoidable if the source reports as required under subsection (3) of this section and adequately demonstrates that the excess emissions could not have been avoided through reasonable design, better scheduling for maintenance or through better operation and maintenance practices.

(6) Excess emissions due to upsets shall be considered unavoidable provided the source reports as required under subsection (3) of this section and adequately demonstrates that:

- (a) The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition;
- (b) The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance; and
- (c) The operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded.

State effective: 9/20/93; EPA effective: 6/2/95 60 FR 28726, 6/2/95

**~~173-400-110 New Source Review (NSR) for Sources and Portable Sources.~~**

**~~(1) Applicability.~~**

~~(a) WAC 173-400-110, 173-400-111, 173-400-112, and 173-400-113 apply statewide except where a permitting authority has adopted its own new source review regulations.~~

~~(b) This section applies to new sources and stationary sources as defined in RCW 70.94.030, and WAC 173-400-030, but does not include nonroad engines.~~

~~(c) For purposes of this section:~~

~~(i) "Establishment" means to begin actual construction;~~

~~(ii) "New source" includes:~~

~~(A) A modification to an existing stationary source, as "modification" is defined in WAC 173-400-030;~~

~~(B) The construction, modification, or relocation of a portable source as defined in WAC 173-400-030, except those relocating in compliance with WAC 173-400-036;~~

~~—(C) The establishment of a new or modified toxic air pollutant source, as defined in WAC 173-460-020; and~~

~~(D) A major modification to an existing major stationary source, as defined in WAC 173-400-710 and 173-400-810.~~

~~(d) New source review of a modification is limited to the emission unit or units proposed to be modified and the air contaminants whose emissions would increase as a result of the~~

- ~~(i) A violation subject to WAC 173-400-230 (3), (4), and (6); but~~
- ~~(ii) Not subject to civil penalty under WAC 173-400-230(2)~~

~~Note: Nothing in a state rule limits a federal court's jurisdiction or discretion to determine the appropriate remedy in an enforcement action.~~

~~(2) The owner or operator of a source shall have the burden of proving to the permitting authority in an enforcement action that excess emissions were unavoidable. This demonstration shall be a condition to obtaining relief under subsection (5) of this section.~~

~~(3) This section does not apply to an exceedance of an emission standard in 40 C.F.R. Parts 60, 61, 62, 63, and 72, or a permitting authority's adoption by reference of these federal standards.~~

~~(4) Excess emissions that occur due to an upset or malfunction during a startup or shutdown event are treated as an upset or malfunction under subsection (5) of this section.~~

~~(5) Excess emissions due to an upset or malfunction will be considered unavoidable provided the source reports as required by WAC 173-400-108 and adequately demonstrates to the permitting authority that:~~

~~(a) The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition;~~

~~(b) The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance;~~

~~(c) When the operator knew or should have known that an emission standard or other permit condition was being exceeded, the operator took immediate and appropriate corrective action in a manner consistent with safety and good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action. Actions taken could include slowing or shutting down the emission unit as necessary to minimize emissions;~~

~~(d) If the emitting equipment could not be shutdown during the malfunction or upset to prevent the loss of life, prevent personal injury or severe property damage, or to minimize overall emissions, repairs were made in an expeditious fashion;~~

~~(e) All emission monitoring systems and pollution control systems were kept operating to the extent possible unless their shutdown was necessary to prevent loss of life, personal injury, or severe property damage;~~

~~(f) The amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent possible; and~~

~~(g) All practicable steps were taken to minimize the impact of the excess emissions on ambient air quality.~~

~~[Statutory Authority: Chapter 70.94 RCW. WSR 18-17-111 (Order 15-07), § 173-400-109, filed 8/16/18, effective 9/16/18; WSR 11-06-060 (Order 09-01), § 173-400-109, filed 3/1/11, effective 4/1/11.]~~

**WAC 173-400-110 New source review (NSR) for sources and portable sources. (1) Applicability.**

(a) WAC 173-400-110, 173-400-111, 173-400-112, and 173-400-113 apply statewide except where a permitting authority has adopted its own new source review regulations.

(b) This section applies to new sources and stationary sources as defined in RCW 70.94.030, and WAC 173-400-030, but does not include nonroad engines.

(c) For purposes of this section:

(i) "Establishment" means to begin actual construction;

(ii) "New source" includes:

(A) A modification to an existing stationary source, as "modification" is defined in WAC 173-400-030;

(B) The construction, modification, or relocation of a portable source as defined in WAC 173-400-030, except those relocating in compliance with WAC 173-400-036;

~~(C) The establishment of a new or modified toxic air pollutant source, as defined in WAC 173-460-020; and~~

(D) A major modification to an existing major stationary source, as defined in WAC 173-400-710 and 173-400-810.

(d) New source review of a modification is limited to the emission unit or units proposed to be modified and the air contaminants whose emissions would increase as a result of the modification. Review of a major modification must comply with WAC 173-400-700 through 173-400-750 or 173-400-800 through 173-400-860, as applicable.

~~(e) The procedural requirements pertaining to NOC applications and orders of approval for new sources that are not major stationary sources, as defined in WAC 173-400-710 and 173-400-810, shall not apply to any person conducting a remedial action at a facility pursuant to a consent decree, order, or agreed order issued pursuant to chapter 70.105D RCW, Model Toxics Control Act, or to the department of ecology when it conducts a remedial action under chapter 70.105D RCW. The department of ecology shall ensure compliance with the substantive requirements of this chapter through the consent decree, order, or agreed order issued pursuant to chapter 70.105D RCW using the procedures outlined in WAC 173-340-710(9) or during a department-conducted remedial action, through the procedures outlined in WAC 173-340-710(9).~~

(2) **Preconstruction approval requirements.** The applicant must evaluate the proposed project and submit an application addressing all applicable new source review requirements of this chapter.

(a) A notice of construction application must be filed and an order of approval must be issued by the permitting authority prior to the establishment of any new source or modification except for those new sources or modifications exempt from permitting under subsections (4), (5), and (6) of this section.

(b) If the proposed project is a new major stationary source or a major modification, located in a designated nonattainment area, and if the project emits the air pollutant or precursors of the air pollutant for which the area is designated nonattainment, and the project meets the applicability criteria in WAC 173-400-820, then the project is subject to the permitting requirements of WAC 173-400-800 through 173-400-860.

(c) If the proposed project is a new major stationary source or a major modification that meets the applicability criteria of WAC 173-400-720, then the project is subject to the PSD permitting requirements of WAC 173-400-700 through 173-400-750.

~~(d) If the proposed project will increase emissions of toxic air pollutants regulated under chapter 173-460 WAC, then the project must meet all applicable requirements of that program.~~

(3) **Modifications.**

New source review is required for any modification to a stationary source that requires:

(a) An increase in a plant-wide cap; or

(b) An increase in an emission unit or activity specific emission limit.



**(4) Emission unit and activity exemptions.**

The construction or modification of emission units or an activity in one of the categories listed below is exempt from new source review, provided that the modified unit continues to fall within one of the listed categories. The construction or modification of an emission unit or an activity exempt under this subsection does not require the filing of a notice of construction application.

(a) Maintenance/construction:

- (i) Cleaning and sweeping of streets and paved surfaces;
- (ii) Concrete application, and installation;
- (iii) Dredging wet spoils handling and placement;
- (iv) Paving application and maintenance. This provision does not exempt asphalt plants from this chapter;
- (v) Plant maintenance and upkeep activities (grounds keeping, general repairs, house keeping, plant painting, welding, cutting, brazing, soldering, plumbing, retarring roofs, etc.);
- (vi) Plumbing installation, plumbing protective coating application and maintenance activities;
- (vii) Roofing application and maintenance;
- (viii) Insulation application and maintenance;
- (ix) Janitorial services and consumer use of janitorial products;
- (x) Construction activities that do not result in new or modified stationary sources or portable stationary sources.

(b) Storage tanks:

Note: It can be difficult to determine requirements for storage tanks. Ecology strongly recommends that an owner or operator contact the permitting authority to determine the exemption status of storage tanks prior to their installation.

(i) Lubricating oil storage tanks. This provision does not exempt wholesale distributors of lubricating oils from this chapter;

(ii) Polymer tanks and storage devices and associated pumping and handling equipment, used for solids dewatering and flocculation;

(iii) Storage tanks, reservoirs, pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions;

(iv) Process and white water storage tanks;

(v) Operation, loading and unloading of storage tanks and storage vessels, with lids or other appropriate closure and less than 260-gallon capacity (35 cubic feet);

(vi) Operation, loading and unloading of storage tanks,  $\leq 1100$  gallon capacity, with lids or other appropriate closure, not for use with materials containing toxic air pollutants, as listed in chapter 173-460 WAC, max. VP 550 mm mercury at 21°C;

(vii) Operation, loading and unloading storage of butane, propane, or liquefied petroleum gas with a vessel capacity less than 40,000 gallons;

(viii) Tanks, vessels and pumping equipment, with lids or other appropriate closure for storage or dispensing of aqueous solutions of inorganic salts, bases and acids.

(c) New or modified emission units with combined aggregate heat inputs to combustion units (excluding emergency engines exempted by subsection (4)(h)(xxxix) of this section), less than or equal to all of the following, as applicable:

(i)  $\leq 500,000$  Btu/hr using coal with  $\leq 0.5\%$  sulfur or other solid fuels with  $\leq 0.5\%$  sulfur;

(ii)  $\leq 500,000$  Btu/hr using used oil, per the requirements of RCW 70.94.610;

(iii)  $\leq 400,000$  Btu/hr using wood waste or paper;

- (iv)  $\leq 1,000,000$  Btu/hr using gasoline, kerosene, #1, or #2 fuel oil and with  $\leq 0.05\%$  sulfur;'
- (v)  $\leq 4,000,000$  Btu/hr using natural gas, propane, or LPG.'
- (d) Material handling:'
- (i) Continuous digester chip feeders;'
- (ii) Grain elevators not licensed as warehouses or dealers by either the Washington state department of agriculture or the U.S. Department of Agriculture;
- (iii) Storage and handling of water based lubricants for metal working where organic content of the lubricant is  $\leq 10\%$ ;
- (iv) Equipment used exclusively to pump, load, unload, or store high boiling point organic material in tanks less than one million gallon, material with initial atmospheric boiling point not less than  $150^{\circ}\text{C}$  or vapor pressure not more than 5 mm mercury at  $21^{\circ}\text{C}$ , with lids or other appropriate closure.
- (e) Water treatment:
  - (i) Septic sewer systems, not including active wastewater treatment facilities;
  - (ii) NPDES permitted ponds and lagoons used solely for the purpose of settling suspended solids and skimming of oil and grease;
  - (iii) De-aeration (oxygen scavenging) of water where toxic air pollutants as defined in chapter 173-460 WAC are not emitted.'
  - (iv) Process water filtration system and demineralizer vents;'
  - (v) Sewer manholes, junction boxes, sumps and lift stations associated with wastewater treatment systems;
  - (vi) Demineralizer tanks;
  - (vii) Alum tanks;
  - (viii) Clean water condensate tanks.
- (f) Environmental chambers and laboratory equipment:
  - (i) Environmental chambers and humidity chambers using only gases that are not toxic air pollutants listed in chapter 173-460 WAC;
  - (ii) Gas cabinets using only gases that are not toxic air pollutants regulated under chapter 173-460 WAC;
  - (iii) Installation or modification of a single laboratory fume hood;
  - (iv) Laboratory research, experimentation, analysis and testing at sources whose primary purpose and activity is research or education. To be exempt, these sources must not engage in the production of products, or in providing commercial services, for sale or exchange for commercial profit except in a de minimis manner. Pilot-plants or pilot scale processes at these sources are not exempt.
  - (v) Laboratory calibration and maintenance equipment.
- (g) Monitoring/quality assurance/testing:
  - (i) Equipment and instrumentation used for quality control/assurance or inspection purpose;
  - (ii) Hydraulic and hydrostatic testing equipment;
  - (iii) Sample gathering, preparation and management;
  - (iv) Vents from emission monitors and other analyzers.
- (h) Miscellaneous:
  - (i) Single-family residences and duplexes;
  - (ii) Plastic pipe welding;
  - (iii) Primary agricultural production activities including soil preparation, planting, fertilizing, weed and pest control, and harvesting;'
  - (iv) Comfort air conditioning;'
  - (v) Flares used to indicate danger to the public;'

- (vi) Natural and forced air vents and stacks for bathroom/toilet activities;
- (vii) Personal care activities;
- (viii) Recreational fireplaces including the use of barbecues, campfires, and ceremonial fires;
- (ix) Tobacco smoking rooms and areas;
- (x) Noncommercial smokehouses;
- (xi) Blacksmith forges for single forges;
- (xii) Vehicle maintenance activities, not including vehicle surface coating;
- (xiii) Vehicle or equipment washing (see (c) of this subsection for threshold for boilers);
- (xiv) Wax application;
- (xv) Oxygen, nitrogen, or rare gas extraction and liquefaction equipment not including internal and external combustion equipment;
- (xvi) Ozone generators and ozonation equipment;
- (xvii) Solar simulators;
- (xviii) Ultraviolet curing processes, to the extent that toxic air pollutant gases as defined in chapter 173-460 WAC are not emitted;
- (xix) Electrical circuit breakers, transformers, or switching equipment installation or operation;
- (xx) Pulse capacitors;
- (xxi) Pneumatically operated equipment, including tools and hand held applicator equipment for hot melt adhesives;
- (xxii) Fire suppression equipment;
- (xxiii) Recovery boiler blow-down tank;
- (xxiv) Screw press vents;
- (xxv) Drop hammers or hydraulic presses for forging or metal working;
- (xxvi) Production of foundry sand molds, unheated and using binders less than 0.25% free phenol by sand weight;
- (xxvii) Kraft lime mud storage tanks and process vessels;
- (xxviii) Lime grits washers, filters and handling;
- (xxix) Lime mud filtrate tanks;
- (xxx) Lime mud water;
- (xxxi) Stock cleaning and pressurized pulp washing down process of the brown stock washer;
- (xxxii) Natural gas pressure regulator vents, excluding venting at oil and gas production facilities and transportation marketing facilities;
- (xxxiii) Solvent cleaners less than 10 square feet air-vapor interface with solvent vapor pressure not more than 30 mm mercury at 21°C where no toxic air pollutants as listed under chapter 173-460 WAC are emitted;
- (xxxiv) Surface coating, aqueous solution or suspension containing  $\leq 1\%$  (by weight) VOCs, or  $\leq 1\%$  (by weight) toxic air pollutants as listed in chapter 173-460 WAC;
- (xxxv) Cleaning and stripping activities and equipment using solutions having  $\leq 1\%$  VOCs (by weight) or  $\leq 1\%$  (by weight) toxic air pollutants. Acid solutions used on metallic substances are not exempt;
- (xxxvi) Dip coating operations, using materials less than 1% VOCs (by weight) or  $\leq 1\%$  (by weight) toxic air pollutants as listed in chapter 173-460 WAC.
- (xxxvii) Abrasive blasting performed inside a booth or hangar designed to capture the blast grit or overspray.'
- (xxxviii) For structures or items too large to be reasonably handled indoors, abrasive blasting performed outdoors that employs con-

trol measures such as curtailment during windy periods and enclosure of the area being blasted with tarps and uses either steel shot or an abrasive containing less than one percent (by mass) which would pass through a No. 200 sieve.

(xxxix) Stationary emergency internal combustion engines with an aggregate brake horsepower that is less than or equal to 500 brake horsepower.

(xl) Gasoline dispensing facilities with annual gasoline throughputs less than those specified in WAC 173-491-040 (4)(a). Gasoline dispensing facilities subject to chapter 173-491 WAC are exempt from toxic air pollutant analysis pursuant to chapter 173-460 WAC.

(5) **Exemptions based on emissions.**

(a) Except as provided in this subsection:

(i) Construction of a new emissions unit that has a potential to emit below each of the levels listed in Table 110(5) Exemption levels is exempt from new source review.

(ii) A modification to an existing emissions unit that increases the unit's actual emissions by less than each of the threshold levels listed in Table 110(5) Exemption levels of this subsection is exempt from new source review.

(b) Greenhouse gas emissions are exempt from new source review requirements except to the extent required under WAC 173-400-720, prevention of significant deterioration. The owner or operator of a source or emission unit, may request that the permitting authority impose emission limits and/or operation limitations for greenhouse gas in any new source review order of approval.

Table 110(5) Exemption levels:

| POLLUTANT                         | LEVEL (TONS<br>PER YEAR)                                                                           |
|-----------------------------------|----------------------------------------------------------------------------------------------------|
| Carbon monoxide                   | 5.0                                                                                                |
| /HDG                              | 0.005                                                                                              |
| Nitrogen oxides                   | 2.0                                                                                                |
| PM-10                             | 0.75                                                                                               |
| PM-2.5                            | 0.5                                                                                                |
| Total suspended particulates      | 1.25                                                                                               |
| Sulfur dioxide                    | 2.0                                                                                                |
| Volatile Organic Compounds, total | 2.0                                                                                                |
| Ozone Depleting Substances, total | 1.0                                                                                                |
| <del>Toxic Air Pollutants</del>   | <del>The de minimis<br/>emission rate<br/>specified for each<br/>TAP in WAC<br/>173-460-150.</del> |

(6) **Portable source with order of approval.** A portable source is authorized to operate without obtaining a site-specific or a permitting authority specific approval order to relocate if the portable source complies with the provisions of WAC 173-400-036.

[Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-110, filed 11/28/12, effective 12/29/12; WSR 11-06-060 (Order 09-01), § 173-400-110, filed 3/1/11, effective 4/1/11. Statutory Authority: Washington Clean Air Act, RCW 70.94.152. WSR 09-11-131 (Order 05-19), § 173-400-110, filed 5/20/09, effective 6/20/09. Statutory Authority: RCW 70.94.395 and 70.94.331. WSR 07-11-039 (Order 06-03), § 173-400-110, filed 5/8/07, effective 6/8/07. Statutory Authority: RCW

70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-110, filed 1/10/05, effective 2/10/05. Statutory Authority: Chapter 70.94 RCW, RCW 70.94.141, [70.94.]152, [70.94.]331, [70.94.]510 and 43.21A.080. WSR 01-17-062 (Order 99-06), § 173-400-110, filed 8/15/01, effective 9/15/01. Statutory Authority: RCW 70.94.860, 70.94.510 and 70.94.331. WSR 98-15-129 (Order 98-04), § 173-400-110, filed 7/21/98, effective 8/21/98. Statutory Authority: RCW 70.94.152. WSR 98-01-183 (Order 96-01), § 173-400-110, filed 12/23/97, effective 1/23/98. Statutory Authority: Chapter 70.94 RCW. WSR 93-18-007 (Order 93-03), § 173-400-110, filed 8/20/93, effective 9/20/93; WSR 91-05-064 (Order 90-06), § 173-400-110, filed 2/19/91, effective 3/22/91. Statutory Authority: Chapters 43.21A and 70.94 RCW. WSR 83-09-036 (Order DE 83-13), § 173-400-110, filed 4/15/83. Statutory Authority: RCW 70.94.331, 70.94.510, and 70.94.785. WSR 81-03-002 (Order DE 80-53), § 173-400-110, filed 1/8/81. Statutory Authority: RCW 70.94.331. WSR 80-11-059 (Order DE 80-14), § 173-400-110, filed 8/20/80. Statutory Authority: RCW 43.21A.080 and 70.94.331. WSR 79-06-012 (Order DE 78-21), § 173-400-110, filed 5/8/79; Order DE 76-38, § 173-400-110, filed 12/21/76. Formerly WAC 18-04-110.]

**EPA effective: 11/28/16 (81 FR 66825, 9/29/16)**

**WAC 173-400-111 Processing notice of construction applications for sources, stationary sources and portable sources.** WAC 173-400-110, 173-400-111, 173-400-112, and 173-400-113 apply statewide except where a permitting authority has adopted its own new source review regulations.

(1) Completeness determination.

(a) Within thirty days after receiving a notice of construction application, the permitting authority must either notify the applicant in writing that the application is complete or notify the applicant in writing of all additional information necessary to complete the application.

(b) A complete application contains all the information necessary for processing the application. At a minimum, the application must provide information on the nature and amounts of emissions to be emitted by the proposed new source or increased as part of a modification, as well as the location, design, construction, and operation of the new source as needed to enable the permitting authority to determine that the construction or modification will meet the requirements of WAC 173-400-113. Designating an application complete for purposes of permit processing does not preclude the reviewing authority from requesting or accepting any additional information.

(c) For a project subject to the special protection requirements for federal Class I areas under WAC 173-400-117(2), a completeness determination includes a determination that the application includes all information required for review of that project under WAC 173-400-117(3). The applicant must send a copy of the application and all amendments to the application to the EPA and the responsible federal land manager.

(d) For a project subject to the major new source review requirements in WAC 173-400-800 through 173-400-860, the completeness determination includes a determination that the application includes all information required for review under those sections.

(e) An application is not complete until any permit application fee required by the permitting authority has been paid.

(2) Coordination with chapter 173-401 WAC, operating permit regulation. A person seeking approval to construct or modify a source that



requires an operating permit may elect to integrate review of the operating permit application or amendment required under chapter 173-401 WAC and the notice of construction application required by this section. A notice of construction application designated for integrated review must be processed in accordance with operating permit program procedures and deadlines in chapter 173-401 WAC and must comply with WAC 173-400-171.

(3) Criteria for approval of a notice of construction application. An order of approval cannot be issued until the following criteria are met as applicable:

- (a) The requirements of WAC 173-400-112;
- (b) The requirements of WAC 173-400-113;
- (c) The requirements of WAC 173-400-117;
- (d) The requirements of WAC 173-400-171;
- (e) The requirements of WAC 173-400-200 and 173-400-205;
- (f) The requirements of WAC 173-400-700 through 173-400-750;
- (g) The requirements of WAC 173-400-800 through 173-400-860;
- ~~(h) The requirements of chapter 173-460 WAC; and~~

(i) All fees required under chapter 173-455 WAC (or the applicable new source review fee table of the local air pollution control authority) have been paid.

(4) Final determination - Time frame and signature authority.

(a) Within sixty days of receipt of a complete notice of construction application, the permitting authority must either:

(i) Issue a final decision on the application; or

(ii) Initiate notice and comment for those projects subject to WAC 173-400-171 followed as promptly as possible by a final decision.

(b) Every final determination on a notice of construction application must be reviewed and signed prior to issuance by a professional engineer or staff under the direct supervision of a professional engineer in the employ of the permitting authority.

(5) Distribution of the final decision.

(a) The permitting authority must promptly provide copies of each order approving or denying a notice of construction application to the applicant and to any other party who submitted timely comments on the application, along with a notice advising parties of their rights of appeal to the pollution control hearings board.

(b) If the new source is a major stationary source or the change is a major modification subject to the requirements of WAC 173-400-800 through 173-400-860, the permitting authority must:

(i) Submit any control technology (LAER) determination included in a final order of approval to the RACT/BACT/LAER clearinghouse maintained by EPA; and

(ii) Send a copy of the final approval order to EPA.

(6) Appeals. Any conditions contained in an order of approval, or the denial of a notice of construction application may be appealed to the pollution control hearings board as provided under chapters 43.21B RCW and 371-08 WAC.

(7) Construction time limitations.

(a) Approval to construct or modify a stationary source becomes invalid if construction is not commenced within eighteen months after receipt of the approval, if construction is discontinued for a period of eighteen months or more, or if construction is not completed within a reasonable time. The permitting authority may extend the eighteen-month period upon a satisfactory showing by the permittee that an extension is justified.

(b) The extension of a project that is either a major stationary source, as defined in WAC 173-400-810, in a nonattainment area or a major modification, as defined in WAC 173-400-810, of a major stationary source in a nonattainment area must also require LAER, for the pollutants for which the area is classified as nonattainment, as LAER exists at the time of the extension for the pollutants that were subject to LAER in the original approval.

(c) This provision does not apply to the time period between construction of the approved phases of a phased construction project. Each phase must commence construction within eighteen months of the projected and approved commence construction date.

(8) Change of conditions or revisions to orders of approval.

(a) The owner or operator may request, at any time, a change in the conditions of an approval order and the permitting authority may approve the request provided the permitting authority finds that:

(i) The change in conditions will not cause the source to exceed an emissions standard set by regulation or rule;

(ii) No ambient air quality standard will be exceeded as a result of the change;

(iii) The change will not adversely impact the ability of the permitting authority to determine compliance with an emissions standard;

(iv) The revised order will continue to require BACT for each new source approved by the order except where the Federal Clean Air Act requires LAER; and

(v) The revised order meets the requirements of WAC 173-400-111, 173-400-112, 173-400-113, 173-400-720, 173-400-830, and 173-460-040, as applicable.

(b) Actions taken under this subsection are subject to the public involvement provisions of WAC 173-400-171 or the permitting authority's public notice and comment procedures.

(c) The applicant must consider the criteria in 40 C.F.R. 52.21 (r)(4) (in effect on the date in WAC 173-400-025) or 173-400-830(3), as applicable, when determining which new source review approvals are required.

(9) Fees Chapter 173-455 WAC lists the required fees payable to ecology for various permit actions.

(10) Enforcement. All persons who receive an order of approval must comply with all approval conditions contained in the order of approval.

[Statutory Authority: RCW 70.94.152, 70.94.331, 70.94.860. WSR 16-12-099 (Order 16-01), § 173-400-111, filed 5/31/16, effective 7/1/16. Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-111, filed 11/28/12, effective 12/29/12; WSR 11-06-060 (Order 09-01), § 173-400-111, filed 3/1/11, effective 4/1/11.]

|                                               |
|-----------------------------------------------|
| EPA effective: 11/7/16 (81 FR 69385, 10/6/16) |
|-----------------------------------------------|

**WAC 173-400-112 Requirements for new sources in nonattainment areas—Review for compliance with regulations.** WAC 173-400-110, 173-400-111, 173-400-112, and 173-400-113 apply statewide except where a permitting authority has adopted its own new source review regulations. The permitting authority that is reviewing an application required by WAC 173-400-110(2) to establish a new source in a nonattain-



ment area shall issue the order of approval if it determines that the proposed project satisfies each of the following requirements:

(1) The proposed new source or modification will comply with all applicable new source performance standards, national emission standards for hazardous air pollutants, national emission standards for hazardous air pollutants for source categories, emission standards adopted under chapter 70.94 RCW and, for sources regulated by an authority, the applicable emission standards of that authority.

(2) The proposed new source or modification will achieve LAER for any air contaminants for which:

(a) The area has been designated nonattainment; and

(b) (i) The proposed new source is major; or

(ii) The existing source is major and the major modification is significant.

(3) The proposed new source will employ BACT for those air contaminants not subject to LAER that the new source will emit or for which the proposed modification will cause an emissions increase.

(4) The proposed new source or modification will not cause any ambient air quality standard to be exceeded, will not violate the requirements for reasonable further progress established by the SIP and will comply with WAC 173-400-113 (3) and (4) for all air contaminants for which the area has not been designated nonattainment.

(5) If the proposal is a new major stationary source or a major modification as those terms are defined in WAC 173-400-810 then it must also comply with WAC 173-400-800 through 173-400-860.

[Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-112, filed 11/28/12, effective 12/29/12; WSR 11-06-060 (Order 09-01), § 173-400-112, filed 3/1/11, effective 4/1/11. Statutory Authority: RCW 70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-112, filed 1/10/05, effective 2/10/05. Statutory Authority: Chapter 70.94 RCW, RCW 70.94.141, [70.94.]152, [70.94.]331, [70.94.]510 and 43.21A.080. WSR 01-17-062 (Order 99-06), § 173-400-112, filed 8/15/01, effective 9/15/01. Statutory Authority: Chapter 70.94 RCW. WSR 93-18-007 (Order 93-03), § 173-400-112, filed 8/20/93, effective 9/20/93.]

**EPA effective: 11/28/16 (81 FR 66825, 9/29/16)**

**WAC 173-400-113 New sources in attainment or unclassifiable areas—Review for compliance with regulations.** WAC 173-400-110, 173-400-111, 173-400-112, and 173-400-113 apply statewide except where a permitting authority has adopted its own new source review regulations. The permitting authority that is reviewing an application to establish a new source or modification in an attainment or unclassifiable area shall issue an order of approval if it determines that the proposed project satisfies each of the following requirements:

(1) The proposed new source or modification will comply with all applicable new source performance standards, national emission standards for hazardous air pollutants, national emission standards for hazardous air pollutants for source categories, emission standards adopted under chapter 70.94 RCW and, for sources regulated by an authority, the applicable emission standards of that authority.

(2) The proposed new source or modification will employ BACT for all pollutants not previously emitted or whose emissions would increase as a result of the new source or modification.

(3) Allowable emissions from the proposed new source or the increase in emissions from the proposed modification will not cause or contribute to a violation of any ambient air quality standard. If the modeled concentrations of allowable emissions from the proposed new source or the increase in emissions from the proposed modification are below the levels in Table 4a, the proposed source does not contribute to a violation of an ambient air quality standard.

(4) (a) If the projected impact of the allowable emissions from the proposed new major stationary source (as defined in WAC 173-400-810) or the projected impact of the increase in allowable emissions from the proposed major modification (as defined in WAC 173-400-810) at any location within a nonattainment area does not exceed the following levels for the pollutants for which the area has been designated nonattainment, then the proposed new source or modification will not be considered to cause or contribute to a violation of an ambient air quality standard:

Table 4a:  
Cause or Contribute Threshold Values for Nonattainment Area Impacts

|        | Annual<br>300XWDQW    | 24-Hour<br>\$YHUDJH   | 8-Hour<br>\$YHUDJH    | 3-Hour<br>\$YHUDJH   | 1-Hour<br>\$YHUDJH   |
|--------|-----------------------|-----------------------|-----------------------|----------------------|----------------------|
| CO-    | -                     |                       | 0.5 mg/m <sup>3</sup> | -                    | 2 mg/m <sup>3</sup>  |
| 62 2   | 1.0 µg/m <sup>3</sup> | 5 µg/m <sup>3</sup>   | -                     | 25 µg/m <sup>3</sup> | 30 µg/m <sup>3</sup> |
| 30 10  | 1.0 µg/m <sup>3</sup> | 5 µg/m <sup>3</sup>   | -                     | -                    | -                    |
| 30 2.5 | 0.3 µg/m <sup>3</sup> | 1.2 µg/m <sup>3</sup> |                       |                      |                      |
| 12 2   | 1.0 µg/m <sup>3</sup> | -                     | -                     | -                    | -                    |

(b) If the projected impact of the allowable emissions from the proposed new major stationary source (as defined in WAC 173-400-810) or the projected impact of the increase in allowable emissions from the proposed major modification (as defined in WAC 173-400-810) results in a projected impact at any location inside a nonattainment area above the appropriate value in Table 4a of this section may use an offsetting emission reduction or other method identified in 40 C.F.R. Part 51 Appendix S, Sections III and IV.A which reduce the projected impacts to the above values or less. If the owner or operator of the proposed new major stationary source or major source proposed to be modified is unable to reduce emissions or obtain offsetting emissions reductions adequate to reduce modeled impacts below the values in Table 4a of this section, then the permitting authority shall deny approval to construct and operate the proposed new major stationary source or major modification.

(5) If the proposal is a new major stationary source or a major modification as defined in WAC 173-400-720, then it must also comply with WAC 173-400-700 through 173-400-750.

[Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-113, filed 11/28/12, effective 12/29/12; WSR 11-06-060 (Order 09-01), § 173-400-113, filed 3/1/11, effective 4/1/11. Statutory Authority: RCW 70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-113, filed 1/10/05, effective 2/10/05. Statutory Authority: Chapter 70.94 RCW, RCW 70.94.141, [70.94.]152, [70.94.]331, [70.94.]510 and 43.21A.080. WSR 01-17-062 (Order 99-06), § 173-400-113, filed 8/15/01, effective 9/15/01. Statutory Authority: Chapter 70.94 RCW. WSR 93-18-007 (Order 93-03), § 173-400-113, filed 8/20/93, effective 9/20/93.]

EPA effective: 5/29/15 (80 FR 23721, 4/29/15)

~~WAC 173-400-114 Requirements for replacement or substantial alteration of emission control technology at an existing stationary source.~~ (1) Any ~~person~~ proposing to replace or substantially alter the ~~emission~~ control technology installed on an existing ~~stationary source or emission unit~~ shall file a ~~notice of construction application~~ with the appropriate ~~authority~~, or with ~~ecology~~ in areas or for ~~sources~~ over which ~~ecology~~ has jurisdiction. Replacement or substantial alteration of control technology does not include routine maintenance, repair or similar parts replacement.

(2) A project to replace or substantially alter emission control technology at an existing stationary source that results in an increase in emissions of any air contaminant is subject to new source review as provided in WAC 173-400-110. For any other project to replace or significantly alter control technology the permitting ~~authority~~ may:

(a) Require that the owner or operator employ ~~RACT~~ for the affected ~~emission unit~~;

(b) Prescribe reasonable operation and maintenance conditions for the control equipment; and

(c) Prescribe other requirements as authorized by chapter 70.94 RCW.

(3) Within thirty days of receipt of a ~~notice of construction application~~ under this section ~~ecology~~ or the ~~authority~~ shall either notify the applicant in writing that the application is complete or notify the applicant in writing of all additional information necessary to complete the application. Within thirty days of receipt of a complete ~~notice of construction application~~ under this section ~~ecology~~ or the ~~authority~~ shall either issue an ~~order of approval~~ or a proposed ~~RACT~~ determination for the proposed project.

(4) Construction shall not ~~"commence,"~~ as defined in WAC 173-400-030, on a project subject to review under this section until ~~ecology~~ or the ~~authority~~ issues a final ~~order of approval~~. However, any ~~notice of construction application~~ filed under this section shall be deemed to be approved without conditions if ~~ecology~~ or the ~~authority~~ takes no action within thirty days of receipt of a complete ~~notice of construction application~~.

(5) Approval to replace or substantially alter ~~emission~~ control technology shall become invalid if construction is not ~~commenced~~ within eighteen months after receipt of such approval, if construction is discontinued for a period of eighteen months or more, or if construction is not completed within a reasonable time. ~~Ecology~~ or the ~~authority~~ may extend the eighteen-month period upon a satisfactory showing that an extension is justified. This provision does not apply to the time period between construction of the approved phases of a phased construction project; each phase must commence construction within eighteen months of the projected and approved commencement date.

[Statutory Authority: Chapter 70.94 RCW, WSR 12-24-027 (Order 11-10), § 173-400-114, filed 11/28/12, effective 12/29/12. Statutory Authority: Chapter 70.94 RCW, RCW 70.94.141, [70.94.1152, [70.94.1331, [70.94.1510 and 43.21A.080, WSR 01-17-062 (Order 99-06), § 173-400-114, filed 8/15/01, effective 9/15/01. Statutory Authority: Chapter 70.94 RCW, WSR 93-18-007 (Order 93-03), § 173-400-114, filed 8/20/93, effective 9/20/93.]

~~**WAC 173-400-115 Standards of performance for new sources. NSPS.**~~

~~Standards of performance for new sources are called New Source Performance Standards, or NSPS.~~

~~**(1) Adoption of federal rules.**~~

~~(a) 40 C.F.R. Part 60 and Appendices (in effect on the date in WAC 173-400-025) are adopted. Exceptions are listed in (b) of this subsection.~~

~~(b) Exceptions to adopting 40 C.F.R. Part 60.~~

~~(i) The term "administrator" in 40 C.F.R. Part 60 includes the permitting authority.~~

~~(ii) The following sections and subparts of 40 C.F.R. Part 60 are not adopted:~~

~~(A) 40 C.F.R. 60.5 (determination of construction or modification);~~

~~(B) 40 C.F.R. 60.6 (review of plans);~~

~~(C) 40 C.F.R. Part 60, subpart B (Adoption and Submittal of State Plans for Designated Facilities), and subparts C, Ch, Cc, Cd, Ce, BBBB, DDDD, EEEE, MMMM, UUUUU (emission guidelines); and~~

~~(D) 40 C.F.R. Part 60, Appendix G, Provisions for an Alternative Method of Demonstrating Compliance With 40 C.F.R. 60.43 for the Newton Power Station of Central Illinois Public Service Company.~~

~~(2) Where EPA has delegated to the permitting authority, the authority to receive reports under 40 C.F.R. Part 60, from the affected facility in lieu of providing such report to EPA, the affected facility is required to provide such reports only to the permitting authority unless otherwise requested in writing by the permitting authority or EPA.~~

Note: Under RCW 80.50.020(14), larger energy facilities subject to subparts D, Da, GG, J, K, Kb, Y, KKK, LLL, and QQQ are regulated by the HQM/facility site evaluation council (EFSEC).

~~[Statutory Authority: RCW 70.94.152, 70.94.331, 70.94.860 WSR 16-12-099 (Order 16-01), § 173-400-115, filed 5/31/16, effective 7/1/16. Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-115, filed 11/28/12, effective 12/29/12; WSR 11-06-060 (Order 09-01), § 173-400-115, filed 3/1/11, effective 4/1/11. Statutory Authority: RCW 70.94.395 and 70.94.331 WSR 07-11-039 (Order 06-03), § 173-400-115, filed 5/8/07, effective 6/8/07. Statutory Authority: RCW 70.94.152 WSR 05-03-033 (Order 03-07), § 173-400-115, filed 1/10/05, effective 2/10/05. Statutory Authority: Chapter 70.94 RCW, RCW 70.94.141, [70.94.152, [70.94.331, [70.94.510 and 43.21A.080 WSR 01-17-062 (Order 99-06), § 173-400-115, filed 8/15/01, effective 9/15/01. Statutory Authority: [RCW 70.94.331, 70.94.510 and chapter 70.94 RCW] WSR 00-23-130 (Order 98-27), § 173-400-115, filed 11/22/00, effective 12/23/00. Statutory Authority: RCW 70.94.785 WSR 98-22-019 (Order 98-02), § 173-400-115, filed 10/23/98, effective 11/23/98. Statutory Authority: Chapter 70.94 RCW WSR 96-19-054 (Order 94-35), § 173-400-115, filed 9/13/96, effective 10/14/96; WSR 93-05-044 (Order 92-34), § 173-400-115, filed 2/17/93, effective 3/20/93; WSR 91-05-064 (Order 90-06), § 173-400-115, filed 2/19/91, effective 3/22/91. Statutory Authority: RCW 70.94.331, 70.94.395 and 70.94.510 WSR 85-06-046 (Order 84-48), § 173-400-115, filed 3/6/85. Statutory Authority: Chapters 43.21A and 70.94 RCW WSR 83-09-036 (Order DE 83-13), § 173-400-115, filed 4/15/83; WSR 82-16-019 (Order DE 82-20), § 173-400-115, filed 7/27/82. Statutory Authority: RCW 70.94.331 WSR 80-11-059 (Order DE 80-14), § 173-400-115, filed 8/20/80. Statutory Authority: RCW 43.21A.080 and 70.94.331 WSR 79-06-012 (Order DE 78-21), § 173-400-115, filed~~

**WAC 173-400-116 Increment protection.** This section takes effect on the effective date of EPA's incorporation of this section into the Washington state implementation plan.

(1) Ecology will periodically review increment consumption. Within sixty days of the time that information becomes available to ecology that an applicable increment is or may be violated, ecology will review the state implementation plan for its adequacy to protect the increment from being exceeded. The plan will be revised to correct any inadequacies identified or to correct the increment violation. Any changes to the state implementation plan resulting from the review will be subject to public involvement in accordance with WAC 173-400-171 and EPA approval.

(2) PSD increments are published in 40 C.F.R. 52.21(c) (in effect on the date in WAC 173-400-025).

(3) Exclusions from increment consumption. The following concentrations are excluded when determining increment consumption:

(a) Concentrations of particulate matter, PM-10, or PM-2.5, attributable to the increase in emissions from construction or other temporary emission-related activities of new or modified sources;

(b) The increase in concentrations attributable to new sources outside the United States over the concentrations attributable to existing sources which are included in the baseline concentration; and

(c) Concentrations attributable to the temporary increase in emissions of sulfur dioxide, particulate matter, or nitrogen oxides from stationary sources, which are affected by a revision to the SIP approved by EPA. Such a revision must:

(i) Specify the time over which the temporary emissions increase of sulfur dioxide, particulate matter, or nitrogen oxides would occur. Such time is not to exceed two years in duration unless a longer time is approved by EPA.

(ii) Specify that the time period for excluding certain contributions in accordance with (c)(i) of this subsection is not renewable;

(iii) Allow no emissions increase from a stationary source, which would:

(A) Impact a Class I area or an area where an applicable increment is known to be violated; or

(B) Cause or contribute to the violation of a national ambient air quality standard.

(iv) Require limitations to be in effect by the end of the time period specified in accordance with (c)(i) of this subsection, which would ensure that the emissions levels from stationary sources affected by the plan revision would not exceed those levels occurring from such sources before the plan revision was approved.

[Statutory Authority: RCW 70.94.152, 70.94.331, 70.94.860. WSR 16-12-099 (Order 16-01), § 173-400-116, filed 5/31/16, effective 7/1/16. Statutory Authority: Chapter 70.94 RCW. WSR 11-17-037 (Order 11-04), § 173-400-116, filed 8/10/11, effective 9/10/11; WSR 11-06-060 (Order 09-01), § 173-400-116, filed 3/1/11, effective 4/1/11. Statutory Authority: RCW 70.94.181, [70.94.]152, [70.94.]331, [70.94.]650, [70.94.]745, [70.94.]892, [70.94.]011. WSR 07-19-005 (Order 07-10), § 173-400-116, filed 9/6/07, effective 10/7/07. Statutory Authority: RCW 70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-116, filed 1/10/05,



effective 2/10/05. Statutory Authority: Chapter 70.94 RCW, RCW 70.94.141, [70.94.]152, [70.94.]331, [70.94.]510 and 43.21A.080. WSR 01-17-062 (Order 99-06), § 173-400-116, filed 8/15/01, effective 9/15/01. Statutory Authority: Chapter 70.94 RCW. WSR 96-19-054 (Order 94-35), § 173-400-116, filed 9/13/96, effective 10/14/96. Statutory Authority: RCW 70.94.153 and 70.94.154. WSR 94-17-070, § 173-400-116, filed 8/15/94, effective 9/15/94.]

EPA effective: 11/7/16 (81 FR 69385, 10/6/16)

**WAC 173-400-117 Special protection requirements for federal Class I areas.** (1) **Definitions.** The following definitions apply to this section:

(a) **"Adverse impact on visibility"** means visibility impairment that interferes with the management, protection, preservation, or enjoyment of the visitor's visual experience of the federal Class I area. This determination must be made on a case-by-case basis taking into account the geographic extent, intensity, duration, frequency, and time of visibility impairment, and how these factors correlate with:

(i) Times of visitor use of the federal Class I area; and  
(ii) The frequency and timing of natural conditions that reduce visibility.

(b) The terms "major stationary source," "major modification," and "net emissions increase" are defined in WAC 173-400-720 for projects located in areas designated as attainment or unclassifiable for the pollutants proposed to increase as a result of the project and are defined in WAC 173-400-810 for projects located in areas designated as nonattainment for the pollutants proposed to increase as a result of the project.

(2) **Applicability.** The requirements of this section apply to all of the following permitting actions:

(a) A PSD permit application for a new major stationary source or a major modification; or

(b) A notice of construction application for a major stationary source or a major modification to a stationary source in a nonattainment area, as either of those terms are defined in WAC 173-400-810.

(3) **Contents and distribution of application.**

(a) The application shall include an analysis of the anticipated impacts of the project on visibility in any federal Class I area.

(b) The applicant must mail a copy of the application for the project and all amendments to the application to the permitting authority, EPA and to the responsible federal land managers. Ecology will provide a list of the names and addresses of the federal land manager.

(4) **Notice to federal land manager.**

(a) The permitting authority shall send a copy of the completeness determination to the responsible federal land manager.

(b) If, prior to receiving a notice of construction application or a PSD permit application, the permitting authority receives notice of a project described in subsection (2) of this section that may affect visibility in a federal Class I area, the permitting authority shall notify the responsible federal land manager within thirty days of the notification.

(5) **Analysis by federal land manager.**

(a) The permitting authority will consider any demonstration presented by the responsible federal land manager that emissions from a proposed new major stationary source or the net emissions increase

from a proposed major modification described in subsection (2) of this section would have an adverse impact on visibility in any federal Class I area, provided that the demonstration is received by the permitting authority within thirty days of the federal land manager's receipt of the complete application.

(b) If the permitting authority concurs with the federal land manager's demonstration, the PSD permit or approval order for the project either shall be denied, or conditions shall be included in the approval order to prevent the adverse impact.

(c) If the permitting authority finds that the federal land manager's analysis does not demonstrate that the project will have an adverse impact on visibility in a federal Class I area, the permitting authority shall explain its decision in compliance with the notice requirements of WAC 173-400-171 for those permits subject to WAC 173-400-800 through 173-400-860. For permits subject to the prevention of significant deterioration program, the permitting authority shall state in the public notice required by WAC 173-400-740 that an explanation of the decision appears in the Technical Support Document for the proposed permit.

**(6) Additional requirements for projects that require a PSD permit.**

(a) For sources impacting federal Class I areas, the permitting authority shall provide notice to EPA of every action related to consideration of the PSD permit.

(b) The permitting authority shall consider any demonstration received from the responsible federal land manager prior to the close of the public comment period on a proposed PSD permit that emissions from the proposed new major stationary source or the net emissions increase from a proposed major modification would have an adverse impact on the air quality-related values (including visibility) of any mandatory Class I federal area.

(c) If the permitting authority concurs with the demonstration, the PSD permit either shall be denied, or conditions shall be included in the PSD permit to prevent the adverse impact.

**(7) Additional requirements for projects located in nonattainment areas.** In reviewing a PSD permit application or notice of construction application for a new major stationary source or major modification proposed for construction, as those terms are defined in WAC 173-400-810, in an area classified as nonattainment, the permitting authority must ensure that the proposed new source's emissions or the proposed modification's increase in emissions will be consistent with making reasonable progress toward meeting the national goal of preventing any future, and remedying any existing, impairment of visibility by human-caused air pollution in mandatory Class I federal areas. In determining the need for approval order conditions to meet this requirement, the permitting authority may take into account the costs of compliance, the time necessary for compliance, the energy and nonair quality environmental impacts of compliance, and the useful life of the source.

**(8) Monitoring.** The permitting authority may require post-construction monitoring of the impact from the project. The monitoring shall be limited to the impacts on visibility in any federal Class I area near the proposed project.

[Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-117, filed 11/28/12, effective 12/29/12. Statutory Authority: RCW 70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-117, filed



1/10/05, effective 2/10/05. Statutory Authority: Chapter 70.94 RCW, RCW 70.94.141, [70.94.]152, [70.94.]331, [70.94.]510 and 43.21A.080. WSR 01-17-062 (Order 99-06), § 173-400-117, filed 8/15/01, effective 9/15/01.]

EPA effective: 5/29/15 (80 FR 23721, 4/29/15)

**WAC 173-400-118 Designation of Class I, II, and III areas. (1) Designation.**

(a) Lands within the exterior boundaries of Indian reservations may be proposed for redesignation by an Indian governing body or EPA. This restriction does not apply to nontrust lands within the 1873 Survey Area of the Puyallup Indian Reservation.

(b) All areas of the state must be designated either Class I, II or III.

(i) The following areas are the Class I areas in Washington state:

- (A) Alpine Lakes Wilderness;
- (B) Glacier Peak Wilderness;
- (C) Goat Rocks Wilderness;
- (D) Adams Wilderness;
- (E) Mount Rainier National Park;
- (F) North Cascades National Park;
- (G) Olympic National Park;
- (H) Pasayten Wilderness; and
- (I) Spokane Indian Reservation.<sup>1</sup>

(ii) All other areas of the state are Class II, but may be redesignated as provided in subsections (2) and (3) of this section.

<sup>1</sup>. (3 A redesignated this land based on a request from the Spokane Tribal Council. See 40 C.F.R. 52.2497 and 56 FR 14862, April 12, 1991, for details.

**(2) Restrictions on area classifications.**

(a) Except for the Spokane Indian Reservation, the Class I areas listed in subsection (1) of this section may not be redesignated.

(b) Except as provided in (a) of this subsection, the following areas that exceed 10,000 acres in size may be redesignated as Class I or II:

(i) Areas in existence on August 7, 1977:

- (A) A national monument;
- (B) A national primitive area;
- (C) A national preserve;
- (D) A national wild and scenic river;
- (E) A national wildlife refuge;
- (F) A national lakeshore or seashore; or
- (G) A national recreation area.

(ii) Areas established after August 7, 1977:

- (A) A national park;
- (B) A national wilderness area; or
- (C) Areas proposed by ecology for designation or redesignation.

**(3) Redesignation of area classifications.**

(a) Ecology shall propose the redesignation of an area classification as a revision to the SIP.

(b) Ecology may submit to EPA a proposal to redesignate areas of the state as Class I or II if:

(i) Ecology followed the public involvement procedures in WAC 173-400-171(12);

(ii) Ecology explained the reasons for the proposed redesignation, including a description and analysis of the health, environmen-

tal, economic, social, and energy effects of the proposed redesignation;

(iii) Ecology made available for public inspection at least thirty days before the hearing the explanation of the reasons for the proposed redesignation;

(iv) Ecology notified other states, tribal governing bodies, and federal land managers (as defined in 40 C.F.R. 52.21 (b)(24)) whose lands may be affected by the proposed redesignation at least thirty days prior to the public hearing;

(v) Ecology consulted with the elected leadership of local governments in the area covered by the proposed redesignation before proposing the redesignation; and

(vi) Ecology followed these procedures when a redesignation includes any federal lands:

(A) Ecology notified in writing the appropriate federal land manager on the proposed redesignation. Ecology allowed forty-five days for the federal land manager to confer with ecology and to submit written comments.

(B) Ecology responded to any written comments from the federal land manager that were received within forty-five days of notification. Ecology's response was available to the public in advance of the notice of the hearing.

(I) Ecology sent the written comments of the federal land manager, along with ecology's response to those comments, to the public location as required in WAC 173-400-171 (2)(a).

(II) If ecology disagreed with the federal land manager's written comments, ecology published a list of any inconsistency between the redesignation and the comments of the federal land manager, together with the reasons for making the redesignation against the recommendation of the federal land manager.

(c) Ecology may submit to EPA a proposal to redesignate any area other than an area to which subsection (1) of this section applies as Class III if:

(i) The redesignation followed the public involvement requirements of WAC 173-400-171 and 173-400-118(3);

(ii) The redesignation has been specifically approved by the governor of Washington state, after consultation with the appropriate committees of the legislature if it is in session, or with the leadership of the legislature, if it is not in session;

(iii) The redesignation has been approved by local governments representing a majority of the residents of the area to be redesignated. The local governments enacted legislation or passed resolutions concurring in the redesignation;

(iv) The redesignation would not cause, or contribute to, a concentration of any air contaminant which would exceed any maximum allowable increase permitted under the classification of any other area or any National Ambient Air Quality Standard; and

(v) A PSD permit under WAC 173-400-720 for a new major stationary source or major modification could be issued only if the area in question were redesignated as Class III, and material submitted as part of that application was available for public inspection prior to any public hearing on redesignation of the area as Class III.

[Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-118, filed 11/28/12, effective 12/29/12. Statutory Authority: RCW 70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-118, filed 1/10/05, effective 2/10/05. Statutory Authority: Chapter 70.94 RCW,

~~**WAC 173-400-120 Bubble rules.**~~ (1) ~~Applicability. The owner(s) or operator(s) of any source(s) may apply for a bubble for any contaminant regulated by state or federal law for which the emission requirement may be stated as an allowable limit in weight of contaminant per unit time for the emissions units involved.~~

~~(2) Conditions. A bubble may be authorized provided the following conditions have been demonstrated to the satisfaction of the permitting authority.~~

~~(a) The contaminants exchanged must be of the same type, that is, PM<sub>10</sub> for PM<sub>10</sub>, sulfur dioxide for sulfur dioxide, etc.~~

~~(b) The bubble will not interfere with the attainment and maintenance of air quality standards. No bubble shall be authorized in a nonattainment area unless there is an EPA-approved SIP which demonstrates attainment for that area.~~

~~(c) The bubble will not result in a delay in compliance by any source, nor a delay in any existing enforcement action.~~

~~(d) The bubble will not supersede NSPS, NESHAPS, RACT, or LAER. The emissions of hazardous contaminants shall not be increased.~~

~~(e) The bubble will not result in an increase in the sum of actual emission rates of the contaminant involved from the emissions units involved.~~

~~(f) A bubble may not be authorized only for opacity limits. However, if the emission limit for particulates for a given emissions unit is increased as part of a bubble, the opacity limit for the given emissions unit may be increased subject to the following limitations:~~

~~(i) The new opacity limit shall be specific for the given emissions unit;~~

~~(ii) The new opacity limit shall be consistent with the new particulates limit;~~

~~(iii) An opacity greater than sixty percent shall never be authorized;~~

~~(iv) If the given emissions unit emits or has the potential to emit one hundred tons per year or more of particulate matter, the opacity shall be monitored continuously.~~

~~(g) The emission limits of the bubble are equivalent to existing limits in enforceability.~~

~~(h) Concurrent with or prior to the authorization of a bubble, each emission unit involved in a bubble shall receive or have received a regulatory order or permit that establishes total allowable emissions from the source for the contaminant being bubbled, expressed as weight of the contaminant per unit time.~~

~~(i) There will be no net adverse impact upon air quality from the establishment of new emission requirements for a specific source or emissions unit. Determination of net adverse impact shall include but not be limited to public perception of opacity and public perception of odorous contaminants.~~

~~(j) Specific situations may require additional demonstration as requested by the permitting authority.~~

~~(3) Jurisdiction. Whenever a bubble application involves emissions units, some of which are under the jurisdiction of an authority, approval will require concurrence by both authorities. The new emis-~~

sion limits for each emissions unit will be enforced by the authority of original jurisdiction.

(4) Additional information. Within thirty days, after the receipt of a bubble application and all supporting data and documentation, the permitting authority may require the submission of additional information needed to review the application.

(5) Approval. Within thirty days after all the required information has been received, the permitting authority shall approve or deny the application, based on a finding that conditions in subsection (2)(a) through (j) of this section have been satisfied or not. If the application is approved, a regulatory order or equivalent document shall be issued which includes new allowable emissions limits expressed in weight of pollutant per unit time for each emissions unit affected by the bubble. The regulatory order or equivalent document shall include any conditions required to assure that subsection (2)(a) through (j) of this section will be satisfied. If the bubble depends in whole or in part upon the shutdown of equipment, the regulatory order or equivalent document must prohibit operation of the affected equipment. The regulatory order establishing the bubble is subject to the public involvement requirements of WAC 173-400-171.

[Statutory Authority: RCW 70.94.152 WSR 05-03-033 (Order 03-07), § 173-400-120, filed 1/10/05, effective 2/10/05. Statutory Authority: Chapter 70.94 RCW. WSR 93-18-007 (Order 93-03), § 173-400-120, filed 8/20/93, effective 9/20/93; WSR 91-05-064 (Order 90-06), § 173-400-120, filed 2/19/91, effective 3/22/91. Statutory Authority: Chapters 43.21A and 70.94 RCW. WSR 89-02-055 (Order 88-39), § 173-400-120, filed 1/3/89; WSR 83-09-036 (Order DE 83-13), § 173-400-120, filed 4/15/83. Statutory Authority: RCW 70.94.331 WSR 80-11-059 (Order DE 80-14), § 173-400-120, filed 8/20/80. Statutory Authority: RCW 43.21A.080 and 70.94.331 WSR 79-06-012 (Order DE 78-21), § 173-400-120, filed 5/8/79; Order DE 76-38, § 173-400-120, filed 12/21/76. Formerly WAC 18-04-120.]

**WAC 173-400-131 Issuance of emission reduction credits. (1) Applicability.** The owner or operator of any source may apply to the permitting authority for an emission reduction credit (ERC) if the source proposes to reduce its actual emissions rate for any contaminant regulated by state or federal law for which the emission requirement may be stated as an allowable limit in weight of contaminant per unit time for the emissions units involved.

(2) **Time of application.** The application for an ERC must be made prior to or within one hundred eighty days after the emission reduction has been accomplished.

(3) **Conditions.** An ERC may be authorized provided the following conditions have been demonstrated to the satisfaction of the permitting authority.

(a) The quantity of emissions in the ERC shall be less than or equal to the old allowable emissions rate or the old actual emissions rate, whichever is the lesser, minus the new allowable emissions rate. The old actual emissions rate is the average emissions rate occurring during the most recent twenty-four-month period preceding the request for an ERC. An alternative twenty-four-month period from within the previous five years may be accepted by the permitting authority if the owner or operator of the source demonstrates to the satisfaction of

the permitting authority that the alternative period is more representative of actual operations of the unit or source.

(b) The ERC application must include a description of all the changes that are required to accomplish the claimed emissions reduction, such as, new control equipment, process modifications, limitation of hours of operation, permanent shutdown of equipment, specified control practices, etc.

(c) The reduction must be: Greater than otherwise required by an applicable emission standard, order of approval, or regulatory order and be permanent, quantifiable, and federally enforceable.

(d) The reduction must be large enough to be readily quantifiable relative to the source strength of the emissions unit(s) involved.

(e) No part of the emission reductions claimed for credit shall have been used as part of a determination of net emission increase, nor as part of an offsetting transaction under WAC 173-400-113(4) or 173-400-830, nor as part of a bubble transaction under WAC 173-400-120.

(f) No part of the emission reduction was included in the emission inventory used to demonstrate attainment or for reasonable further progress in an amendment to the state implementation plan.

(g) Concurrent with or prior to the authorization of an ERC, the applicant shall receive (have received) a federally enforceable regulatory order or permit that establishes total allowable emissions from the source or emissions unit of the contaminant for which the ERC is requested, expressed as weight of contaminant per unit time.

(h) The use of any ERC shall be consistent with all other federal, state, and local requirements of the program in which it is used.

(4) **Additional information.** Within thirty days after the receipt of an ERC application and all supporting data and documentation, the permitting authority may require the submission of additional information needed to review the application.

(5) **Approval.** Within thirty days after all required information has been received, the permitting authority shall approve or deny the application, based on a finding that conditions in subsection (3)(a) through (h) of this section have been satisfied or not. If the application is approved, the permitting authority shall:

(a) Issue a regulatory order or equivalent document to assure that the emissions from the source will not exceed the allowable emission rates claimed in the ERC application, expressed in weight of pollutant per unit time for each emission unit involved. The regulatory order or equivalent document shall include any conditions required to assure that subsection (3)(a) through (h) of this section will be satisfied. If the ERC depends in whole or in part upon the shutdown of equipment, the regulatory order or equivalent document must prohibit operation of the affected equipment; and

(b) Issue a certificate of emission reduction credit. The certificate shall specify the issue date, the contaminants involved, the emission decrease expressed as weight of pollutant per unit time, the nonattainment area involved, if applicable, and the person to whom the certificate is issued. The emission reduction credit listed in the certificate shall be less than the amount of emission reduction achieved by the source. The difference between the emission reduction and the emission reduction credit must be a decrease of at least one ton per year or one percent of the emission reduction, whichever decrease is greater.

(c) The certificate of emission reduction credit shall include the expiration date of the credit.

[Statutory Authority: Chapter 70.94 RCW. WSR 11-06-060 (Order 09-01), § 173-400-131, filed 3/1/11, effective 4/1/11. Statutory Authority: RCW 70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-131, filed 1/10/05, effective 2/10/05. Statutory Authority: Chapter 70.94 RCW, RCW 70.94.141, [70.94.]152, [70.94.]331, [70.94.]510 and 43.21A.080. WSR 01-17-062 (Order 99-06), § 173-400-131, filed 8/15/01, effective 9/15/01. Statutory Authority: Chapter 70.94 RCW. WSR 93-18-007 (Order 93-03), § 173-400-131, filed 8/20/93, effective 9/20/93; WSR 91-05-064 (Order 90-06), § 173-400-131, filed 2/19/91, effective 3/22/91.]

EPA effective: 12/8/14 (79 FR 66291, 11/7/14)

**WAC 173-400-136 Use of emission reduction credits (ERC).** (1)  
**Permissible use.** An ERC may be used to:

(a) Satisfy the requirements for authorization of a bubble under WAC 173-400-120;

(b) As an offsetting reduction to satisfy the requirements for new source review in WAC 173-400-830 or 173-400-113(4);

(c) Or if the reduction meets the criteria to be a creditable contemporaneous emission reduction, to demonstrate a creditable contemporaneous emission reduction for determining a net emissions increase under WAC 173-400-700 through 173-400-750 and 173-400-800 through 173-400-860.

(2) **Surrender of ERC certificate.** When an ERC is used under subsection (1) of this section, the certificate for the ERC must be surrendered to the permitting authority. If only a portion of the ERC is used, the amended certificate will be returned to the owner.

(3) **Conditions of use.**

(a) An ERC may be used only for the air contaminants for which it was issued.

(b) The permitting authority may impose additional conditions of use to account for temporal and spatial differences between the emissions units that generated the ERC and the emissions units that use the ERC.

(4) **Sale of an ERC.** An ERC may be sold or otherwise transferred to a person other than the person to whom it was originally issued. Within thirty days after the transfer of ownership, the certificate must be surrendered to the issuing authority. After receiving the certificate, the issuing authority shall reissue the certificate to the new owner.

(5) **Redemption period.** An unused ERC expires ten years after date of original issue.

(6) **Discount due to change in SIP.** If reductions in emissions beyond those identified in the SIP are required to meet an ambient air quality standard, issued ERCs may be discounted as necessary to reach attainment.

(a) Issued ERCs may be discounted if:

(i) Reductions in emissions beyond those identified in the SIP are required to meet an ambient air quality standard;

(ii) The ambient standard cannot be met through controls on operating sources; and

(iii) The plan must be revised.

(b) The discount shall not exceed the percentage of additional emission reduction needed to reach attainment.

(c) ERCs may be discounted by the permitting authority only after notice to the public according to WAC 173-400-171 and the owners of affected ERCs.



[Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-136, filed 11/28/12, effective 12/29/12; WSR 11-06-060 (Order 09-01), § 173-400-136, filed 3/1/11, effective 4/1/11. Statutory Authority: RCW 70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-136, filed 1/10/05, effective 2/10/05. Statutory Authority: Chapter 70.94 RCW, RCW 70.94.141, [70.94.]152, [70.94.]331, [70.94.]510 and 43.21A.080. WSR 01-17-062 (Order 99-06), § 173-400-136, filed 8/15/01, effective 9/15/01. Statutory Authority: Chapter 70.94 RCW. WSR 93-18-007 (Order 93-03), § 173-400-136, filed 8/20/93, effective 9/20/93; WSR 91-05-064 (Order 90-06), § 173-400-136, filed 2/19/91, effective 3/22/91.]

**EPA effective: 12/8/14 (79 FR 66291, 11/7/14)**

**WAC 173-400-151 Retrofit requirements for visibility protection.**

(1) The requirements of this section apply to an existing stationary facility. An "existing stationary facility" means a stationary source of air contaminants that meets all of these conditions:

(a) The stationary source must have the potential to emit 250 tons per year or more of any air contaminant. Fugitive emissions, to the extent quantifiable, must be counted in determining the potential to emit; and

(b) The stationary source was not in operation prior to August 7, 1962, and was in existence on August 7, 1977; and

(c) Is in one of the following 26 source categories:

|                                                                                                             |                                                                                         |
|-------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|
| Fossil-fuel fired steam electric plants of more than 250 million British thermal units per hour heat input, | Coke oven batteries,                                                                    |
| Coal cleaning plants (thermal dryers),                                                                      | Sulfur recovery plants,                                                                 |
| Kraft pulp mills,                                                                                           | Carbon black plants (furnace process),                                                  |
| Portland cement plants,                                                                                     | Primary lead smelters,                                                                  |
| Primary zinc smelters,                                                                                      | Fuel conversion plants,                                                                 |
| Iron and steel mill plants,                                                                                 | Sintering plants,                                                                       |
| Primary aluminum ore reduction plants,                                                                      | Secondary metal production facilities,                                                  |
| Primary copper smelters,                                                                                    | Chemical process plants,                                                                |
| Municipal incinerators capable of charging more than 250 tons of refuse per GD),                            | Fossil-fuel boilers of more than 250 million British thermal units per hour heat input, |
| Hydrofluoric, sulfuric, and nitric acid plants,                                                             | Petroleum storage and transfer facilities with a capacity exceeding 300,000 barrels,    |
| Petroleum refineries,                                                                                       | 7aonite ore processing facilities,                                                      |
| Lime plants,                                                                                                | Glass fiber processing plants, and                                                      |
| Phosphate rock processing plants,                                                                           | Charcoal production facilities.                                                         |



(d) For purposes of determining whether a stationary source is an existing stationary facility, the term "building, structure, facility, or installation" means all of the pollutant-emitting activities which belong to the same industrial grouping, are located on one or more contiguous or adjacent properties, and are under the control of the same person (or persons under common control). Pollutant-emitting activities shall be considered as part of the same major group (i.e., which have the same two digit code) as described in the *Standard Industrial Classification Manual, 1972*, as amended in the 1977 supplement.

(2) Ecology shall identify each existing stationary facility which may reasonably be anticipated to cause or contribute to visibility impairment in any mandatory Class 1 federal area in Washington and any adjacent state.

(3) For each existing stationary facility identified under subsection (2) of this section, ecology, in consultation with the permitting authority shall determine BART for each air contaminant of concern and any additional air pollution control technologies that are to be required to reduce impairment from the existing stationary facility.

(4) Each existing stationary facility shall apply BART as new technology for control of the air contaminant becomes reasonably available if:

(a) The existing stationary facility emits the air contaminant contributing to visibility impairment;

(b) Controls representing BART for that air contaminant have not previously been required under this section; and

(c) The impairment of visibility in any mandatory Class 1 federal area is reasonably attributable to the emissions of the air contaminant.

[Statutory Authority: RCW 70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-151, filed 1/10/05, effective 2/10/05. Statutory Authority: Chapter 70.94 RCW, RCW 70.94.141, [70.94.]152, [70.94.]331, [70.94.]510 and 43.21A.080. WSR 01-17-062 (Order 99-06), § 173-400-151, filed 8/15/01, effective 9/15/01. Statutory Authority: Chapter 70.94 RCW. WSR 91-05-064 (Order 90-06), § 173-400-151, filed 2/19/91, effective 3/22/91.]

|                                               |
|-----------------------------------------------|
| EPA effective: 11/3/14 (79 FR 59653, 10/3/14) |
|-----------------------------------------------|

**WAC 173-400-161 Compliance schedules.** (1) **Issuance.** Whenever a source is found to be in violation of an emission standard or other provision of this chapter, ecology or the authority may issue a regulatory order requiring that the source be brought into compliance within a specified time. The order shall contain a schedule for installation, with intermediate benchmark dates and a final completion date, and shall constitute a compliance schedule. Requirements for public involvement (WAC 173-400-171) must be met.

(2) **Federal action.** A source shall be considered to be in compliance with this chapter if all the provisions of its individual compliance schedule included with a regulatory order are being met. Such compliance does not preclude federal enforcement action by the EPA until and unless the schedule is submitted and adopted as an amendment to the state implementation plan.

(3) **Penalties for delayed compliance.** Sources on a compliance schedule but not meeting emissions standards may be subject to penalties as provided in the Federal Clean Air Act.

[Statutory Authority: Chapter 70.94 RCW. WSR 91-05-064 (Order 90-06), § 173-400-161, filed 2/19/91, effective 3/22/91.]

EPA effective: 6/2/95 (60 FR 28726, 6/2/95)

**WAC 173-400-171 Public notice and opportunity for public comment.** The purpose of this section is to specify the requirements for notifying the public about air quality actions and to provide opportunities for the public to participate in those actions. This section applies statewide except that the requirements of WAC 173-400-171 (1) through (11) do not apply where the permitting authority has adopted its own public notice provisions.

(1) **Applicability to prevention of significant deterioration, and relocation of portable sources.** This section does not apply to:

(a) A notice of construction application designated for integrated review with actions regulated by WAC 173-400-700 through 173-400-750. In such cases, compliance with the public notification requirements of WAC 173-400-740 is required.

(b) Portable source relocation notices as regulated by WAC 173-400-036, relocation of portable sources.

(2) **Internet notice of application.**

(a) For those applications and actions not subject to a mandatory public comment period per subsection (3) of this section, the permitting authority must post an announcement of the receipt of notice of construction applications and other proposed actions on the permitting authority's internet web site.

(b) The internet posting must remain on the permitting authority's web site for a minimum of fifteen consecutive days.

(c) The internet posting must include a notice of the receipt of the application, the type of proposed action, and a statement that the public may request a public comment period on the proposed action.

(d) Requests for a public comment period must be submitted to the permitting authority in writing via letter, or electronic means during the fifteen-day internet posting period.

(e) A public comment period must be provided for any application or proposed action that receives such a request. Any application or proposed action for which a public comment period is not requested may be processed without further public involvement at the end of the fifteen-day internet posting period.

(3) **Actions subject to a mandatory public comment period.** The permitting authority must provide public notice and a public comment period before approving or denying any of the following types of applications or other actions:

(a) Any application, order, or proposed action for which a public comment period is requested in compliance with subsection (2) of this section.

(b) Any notice of construction application for a new or modified source, including the initial application for operation of a portable source, if there is an increase in emissions of any air pollutant at a rate above the emission threshold rate (defined in WAC 173-400-030) or any increase in emissions of a toxic air pollutant above the acceptable source impact level for that toxic air pollutant as regulated under chapter 173-460 WAC; or

(c) Any use of a modified or substituted air quality model, other than a guideline model in Appendix W of 40 C.F.R. Part 51 (in effect on the date in WAC 173-400-025) as part of review under WAC 173-400-110, 173-400-113, or 173-400-117; or

(d) Any order to determine reasonably available control technology, RACT; or

(e) An order to establish a compliance schedule issued under WAC 173-400-161, or a variance issued under WAC 173-400-180; or

Note: Mandatory notice is not required for compliance orders issued under WAC 173-400-230.

(f) An order to demonstrate the creditable height of a stack which exceeds the good engineering practice, GEP, formula height and sixty-five meters, by means of a fluid model or a field study, for the purposes of establishing an emission limit; or

(g) An order to authorize a bubble; or

(h) An action to discount the value of an emission reduction credit, ERC, issued to a source per WAC 173-400-136; or

(i) A regulatory order to establish best available retrofit technology, BART, for an existing stationary facility; or

(j) A notice of construction application or regulatory order used to establish a creditable emission reduction; or

(k) An order issued under WAC 173-400-091 that establishes limitations on a source's potential to emit; or

(l) The original issuance and the issuance of all revisions to a general order of approval issued under WAC 173-400-560 (this does not include coverage orders); or

(m) An extension of the deadline to begin actual construction of a "major stationary source" or "major modification" in a nonattainment area; or

(n) An application or other action for which the permitting authority determines that there is significant public interest; or

~~(o) An order issued under WAC 173-400-081(4) or 173-400-082 that establishes an emission limitation that exceeds a standard in the SIP.~~

**(4) Advertising the mandatory public comment period.**

(a) Public notice of all applications, orders, or actions listed in subsection (3) of this section must be posted on the permitting authority web site for the duration of the public comment period.

(i) The permitting authority may supplement this method of notification by advertising in a newspaper of general circulation in the area of the proposed action or by other methods appropriate to notify the local community. The applicant or other initiator of the action must pay the publishing cost for all supplemental noticing.

(ii) A permitting authority must publish a notice of the public comment period in a newspaper of general circulation in the area of the proposed action until June 30, 2019. We recommend that a permitting authority continue publishing a notice in a newspaper for a project with high interest. The applicant or other initiator of the action must pay this publishing cost.

(b) This public notice can be posted or given only after all of the information required by the permitting authority has been submitted and after the applicable preliminary determinations, if any, have been made.

(c) The notice must be posted or given before any of the applications or other actions listed in subsection (3) of this section are approved or denied.

**(5) Information available for public review.**

(a) Administrative record. The information submitted by the applicant, and any applicable preliminary determinations, including analyses of the effects on air quality, must be available for public inspection. A permitting authority may comply with this requirement by making these materials available on its web site or in at least one physical location near the proposed project.

(b) The permitting authority must post the following information on its web site for the duration of the public comment period:

- (i) Public notice complying with subsection (6) of this section;
- (ii) Draft permit, order, or action; and
- (iii) Information on how to access the administrative record.

(c) Exemptions from this requirement include information protected from disclosure under any applicable law including, but not limited to, RCW 70.94.205 and chapter 173-03 WAC.

**(6) Public notice components.**

(a) The notice must include:

- (i) The date the notice is posted;
- (ii) The name and address of the owner or operator and the facility;

(iii) A brief description of the proposal and the type of facility, including a description of the facility's processes subject to the permit;

(iv) A description of the air contaminant emissions including the type of pollutants and quantity of emissions that would increase under the proposal;

(v) The location where those documents made available for public inspection may be reviewed;

(vi) Start date and end date for a public comment period consistent with subsection (7) of this section;

(vii) A statement that a public hearing will be held if the permitting authority determines that there is significant public interest;

(viii) The name, address, and telephone number and email address of a person at the permitting authority from whom interested persons may obtain additional information, including copies of the permit draft, the application, all relevant supporting materials, including any compliance plan, permit, and monitoring and compliance certification report, and all other materials available to the permitting authority that are relevant to the permit decision, unless the information is exempt from disclosure;

(b) For projects subject to special protection requirements for federal Class I areas, as required by WAC 173-400-117, public notice must include an explanation of the permitting authority's draft decision or state that an explanation of the draft decision appears in the support document for the proposed order of approval.

**(7) Length of the public comment period.**

(a) The public comment period must consist of a minimum of thirty days and start at least thirty days prior to any hearing. The first day of the public comment period begins on the next calendar day after the permitting authority posts the public notice on their web site.

(b) If a public hearing is held, the public comment period must extend through the hearing date.

(c) The final decision cannot be issued until the public comment period has ended and any comments received during the public comment period have been considered.

**(8) Requesting a public hearing.** The applicant, any interested governmental entity, any group, or any person may request a public

hearing within the public comment period. All hearing requests must be submitted to the permitting authority in writing via letter, or electronic means. A request must indicate the interest of the entity filing it and why a hearing is warranted.

(9) **Setting the hearing date and providing hearing notice.** If the permitting authority determines that significant public interest exists, then it will hold a public hearing. The permitting authority will determine the location, date, and time of the public hearing.

(10) **Notice of public hearing.**

(a) At least thirty days prior to the hearing the permitting authority must provide notice of the hearing as follows:

(i) Post the public hearing notice on the permitting authority web site as directed by subsections (4) and (7) of this section;

(ii) The permitting authority may supplement the web posting by advertising in a newspaper of general circulation in the area of the proposed source or action, or by other methods appropriate to notify the local community; and

(iii) Distribute by electronic means or via the United States postal service the notice of public hearing to any person who submitted written comments on the application or requested a public hearing and in the case of a permit action, to the applicant.

(b) This notice must include the date, time and location of the public hearing and the information described in subsection (6) of this section.

(c) In the case of a permit action, the applicant must pay all supplemental notice costs when the permitting authority determines a supplemental notice is appropriate. Supplemental notice may include, but is not limited to, publication in a newspaper of general circulation in the area of the proposed project.

(11) **Notifying the EPA.** The permitting authority must distribute by electronic means or via the United States postal service a copy of the notice for all actions subject to a mandatory public comment period to the EPA Region 10 regional administrator.

~~(12) **Special requirements for ecology only actions.**~~

~~(a) This subsection applies to ecology only actions including:~~

~~(i) A Washington state recommendation to EPA for the designation of an area as attainment, nonattainment or unclassifiable after EPA promulgation of a new or revised ambient air quality standard or for the redesignation of an unclassifiable or attainment area to nonattainment;~~

~~(ii) A Washington state submittal of a SIP revision to EPA for approval including plans for attainment and maintenance of ambient air quality standards, plans for visibility protection, requests for revision to the boundaries of attainment and maintenance areas, requests for redesignation of Class I, II, or III areas under WAC 173-400-118, and rules to strengthen the SIP.~~

~~(b) Ecology must provide a public hearing or an opportunity for requesting a public hearing on an ecology only action. The notice providing the opportunity for a public hearing must specify the manner and date by which a person may request the public hearing and either provide the date, time and place of the proposed hearing or specify that ecology will publish a notice specifying the date, time and place of the hearing at least thirty days prior to the hearing. When ecology provides the opportunity for requesting a public hearing, the hearing must be held if requested by any person. Ecology may cancel the hearing if no request is received.~~



~~(c) The public notice for ecology only actions must comply with the requirements of 40 C.F.R. 51.102 (in effect on the date in WAC 173-400-025).~~

(13) **Other requirements of law.** Whenever procedures permitted or mandated by law will accomplish the objectives of public notice and opportunity for comment, those procedures may be used in lieu of the provisions of this section.

[Statutory Authority: Chapter 70.94 RCW. WSR 18-17-111 (Order 15-07), § 173-400-171, filed 8/16/18, effective 9/16/18. Statutory Authority: RCW 70.94.152, 70.94.331, 70.94.860. WSR 16-12-099 (Order 16-01), § 173-400-171, filed 5/31/16, effective 7/1/16. Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-171, filed 11/28/12, effective 12/29/12; WSR 11-06-060 (Order 09-01), § 173-400-171, filed 3/1/11, effective 4/1/11. Statutory Authority: RCW 70.94.395 and 70.94.331. WSR 07-11-039 (Order 06-03), § 173-400-171, filed 5/8/07, effective 6/8/07. Statutory Authority: RCW 70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-171, filed 1/10/05, effective 2/10/05. Statutory Authority: Chapter 70.94 RCW, RCW 70.94.141, [70.94.]152, [70.94.]331, [70.94.]510 and 43.21A.080. WSR 01-17-062 (Order 99-06), § 173-400-171, filed 8/15/01, effective 9/15/01. Statutory Authority: Chapter 70.94 RCW. WSR 95-07-126 (Order 93-40), § 173-400-171, filed 3/22/95, effective 4/22/95; WSR 93-18-007 (Order 93-03), § 173-400-171, filed 8/20/93, effective 9/20/93; WSR 91-05-064 (Order 90-06), § 173-400-171, filed 2/19/91, effective 3/22/91.]

EPA effective: 3/25/20 (85 FR 10301, 2/24/20)

**WAC 173-400-175 Public information.** All information, except information protected from disclosure under any applicable law, including, but not limited to, RCW 70.94.205, is available for public inspection at the issuing agency. This includes copies of notice of construction applications, orders, and applications to modify orders.'

[Statutory Authority: RCW 70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-175, filed 1/10/05, effective 2/10/05.]

EPA effective: 11/3/14 (79 FR 59653, 10/3/14)

~~**WAC 173-400-180 Variance.** Any person who owns or is in control of a plant, building, structure, establishment, process, or equipment may apply to ecology for a variance from provisions of this chapter governing the quality, nature, duration, or extent of discharges of air contaminants in accordance with the provisions of RCW 70.94.181.~~

~~(1) **Jurisdiction.** Sources in any area over which a local air pollution control authority has jurisdiction shall make application to that authority rather than ecology. Variances to state rules shall require ecology's approval prior to being issued by an authority. Ecology or the authority may grant such variance, but only after public involvement per WAC 173-400-171.~~

~~(2) **Full faith and credit.** Variances granted in compliance with state and federal laws by an authority for sources under their jurisdiction will be accepted as variances to this regulation.~~

~~(3) **EPA concurrence.** No variance or renewal shall be construed to set aside or delay any requirements of the Federal Clean Air Act except with the approval and written concurrence of the USEPA.~~

~~(4) Fees relating to this section can be found in chapter 173-455 WAC.~~

~~[Statutory Authority: RCW 70.94.181, [70.94.1152, [70.94.1331, [70.94.1650, [70.94.1745, [70.94.1892, [70.94.1011 WSR 07-19-005 (Order 07-10), § 173-400-180, filed 9/6/07, effective 10/7/07. Statutory Authority: Chapter 70.94 RCW WSR 93-18-007 (Order 93-03), § 173-400-180, filed 8/20/93, effective 9/20/93; WSR 91-05-064 (Order 90-06), § 173-400-180, filed 2/19/91, effective 3/22/91.]~~

**WAC 173-400-190 Requirements for nonattainment areas.** The development of specific requirements for nonattainment areas shall include consultation with local government in the area and shall include public involvement per WAC 173-400-171.

[Statutory Authority: Chapter 70.94 RCW. WSR 91-05-064 (Order 90-06), § 173-400-190, filed 2/19/91, effective 3/22/91.]

**EPA effective: 6/2/95 (60 FR 28726, 6/2/95)**

**WAC 173-400-200 Creditable stack height and dispersion techniques.** (1) Applicability. These provisions shall apply to all sources except:

(a) Stacks for which construction had commenced on or before December 31, 1970, except where pollutants are being emitted from such stacks used by sources which were constructed, or reconstructed, or for which major modifications were carried out after December 31, 1970;

(b) Coal-fired steam electric generating units subject to the provisions of Section 118 of the Federal Clean Air Act, which commenced operation before July 1, 1957, and for whose stacks construction commenced before February 8, 1974;

(c) Flares;

(d) Outdoor burning for agricultural or silvicultural purposes as covered under the smoke management plan;

(e) Residential wood combustion and open burning for which episodic restrictions apply.

These provisions shall not be construed to limit the actual stack height.

(2) Prohibitions. No source may use dispersion techniques or excess stack height to meet ambient air quality standards or PSD increment limitations.

(a) Excess stack height. Excess stack height is that portion of a stack which exceeds the greater of:

(i) Sixty-five meters, measured from the ground level elevation at the base of the stack; or

(ii)  $H_g = H + 1.5L$

where:  $H_g$  "good engineering practice" (GEP) stack height, measured from the ground level elevation at the base of the stack,  
 $H$  = height of nearby structure(s) measured from the ground level elevation at the base of the stack,  
 $L$  = lesser dimension, height or projected width, of nearby structure(s), subject to the proviso below.

"Nearby," as used in this subsection for purposes of applying the GEP formula means that distance up to five times the lesser of the height or the width dimension of a structure, but not greater than 0.8 kilometer (1/2 mile).



(b) Dispersion techniques. Increasing final exhaust gas plume rise by manipulating source process parameters, exhaust gas parameters, stack parameters, or combining exhaust gases from several existing stacks into one stack; or other selective handling of exhaust gas streams so as to increase the exhaust gas plume rise. This does not include:

(i) The reheating of a gas stream, following the use of a pollution control system, for the purpose of returning the gas to the temperature at which it was originally discharged from the facility generating the gas stream;

(ii) The merging of gas streams where:

(A) The source was originally designed and constructed with such merged gas streams, as demonstrated by the source owner(s) or operator(s).

(B) Such merging is part of a change in operation at the facility that includes the installation of pollution controls and is accompanied by a net reduction in the allowable emissions of a pollutant. This exclusion shall apply only to the emission limitation for the pollutant affected by such change in operation.

(C) Before July 8, 1985, such merging was part of a change in operation at the facility that included the installation of emissions control equipment or was carried out for sound economic or engineering reasons, and not primarily motivated by an intent to gain emissions credit for greater dispersion.

(3) Exception. EPA, ecology, or a permitting authority may require the use of a field study or fluid model to verify the creditable stack height for the source. This also applies to a source seeking credit after the effective date of this rule for an increase in existing stack height up to that established by the GEP formula. A fluid model or field study shall be performed according to the procedures described in the EPA Guideline for Determination of Good Engineering Practice Height (Technical Support Document of the Stack Height Regulations). The creditable height demonstrated by a fluid model or field study shall ensure that the emissions from a stack do not result in excessive concentrations of any air pollutant as a result of atmospheric downwash, wakes, or eddy effects created by the source itself, nearby structures or nearby terrain features.

(a) "Nearby," as used in this subsection for conducting a field study or fluid model, means not greater than 0.8 km, except that the portion of a terrain feature may be considered to be nearby which falls within a distance of up to ten times the maximum height of the feature, not to exceed two miles if such feature achieves a height 0.8 km from the stack that is at least forty percent of the GEP stack height or twenty-six meters, whichever is greater, as measured from the ground-level elevation at the base of the stack. The height of the structure or terrain feature is measured from the ground-level elevation at the base of the stack.

(b) "Excessive concentration" is defined for the purpose of determining creditable stack height under this subsection and means a maximum ground-level concentration owing to a significant downwash effect which contributes to excursion over an ambient air quality standard. For sources subject to PSD review (WAC 173-400-720 and 40 C.F.R. 52.21) an excessive concentration alternatively means a maximum ground-level concentration owing to a significant downwash effect which contributes to excursion over a PSD increment. The emission rate used in this demonstration shall be the emission rate specified in the state implementation plan, or in the absence of such, the actual emis-

sion rate of the source. "Significant downwash effect" means a maximum ground-level concentration due to emissions from a stack due in whole or in part to downwash, wakes, and eddy effects produced by nearby structures or nearby terrain features which individually is at least forty percent in excess of the maximum concentration experienced in the absence of such downwash, wakes, or eddy effects.

[Statutory Authority: RCW 70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-200, filed 1/10/05, effective 2/10/05. Statutory Authority: Chapter 70.94 RCW. WSR 91-05-064 (Order 90-06), § 173-400-200, filed 2/19/91, effective 3/22/91.]

EPA effective: 11/3/14 (79 FR 59653, 10/3/14)

**WAC 173-400-205 Adjustment for atmospheric conditions.** Varying the rate of emission of a pollutant according to atmospheric conditions or ambient concentrations of that pollutant is prohibited, except as directed according to air pollution episode regulations.

[Statutory Authority: Chapter 70.94 RCW. WSR 91-05-064 (Order 90-06), § 173-400-205, filed 2/19/91, effective 3/22/91.]

EPA effective: 6/2/95 (60 FR 28726, 6/2/95)

**WAC 173-400-210 Emission requirements of prior jurisdictions.** Any emissions unit that was under the jurisdiction of an authority and now is under the jurisdiction of ecology, shall meet all emission requirements that were applicable prior to transfer of jurisdiction if those standards are more stringent than the standards of this chapter or the specific chapter relating to that source.

[Statutory Authority: Chapter 70.94 RCW. WSR 91-05-064 (Order 90-06), § 173-400-210, filed 2/19/91, effective 3/22/91.]

EPA effective: 6/2/95 (60 FR 28726, 6/2/95)

~~**WAC 173-400-220 Requirements for board members.** (1) **Public interest.** A majority of the members of any ecology or authority board shall represent the public interest. A majority of the members of such boards, shall not derive any significant portion of their income from persons subject to enforcement orders pursuant to the state and federal clean air acts. An elected public official and the board shall be presumed to represent the public interest. In the event that a member derives a significant portion of his/her income from persons subject to enforcement orders, he/she shall delegate sole responsibility for administration of any part of the program which involves these persons to an assistant.~~

~~(2) **Disclosure.** Each member of any ecology or authority board shall adequately disclose any potential conflict of interest in any matter prior to any action or consideration thereon, and the member shall remove themselves from participation as a board member in any action or voting on such matter.~~

~~(3) **Define significant income.** For the purposes of this section, "significant portion of income" shall mean twenty percent of gross personal income for a calendar year. In the case of a retired person, "significant portion of income" shall mean fifty percent of income in the form of pension or retirement benefits from a single source other than Social Security. Income derived from employment with local or state government shall not be considered in the determination of "significant portion of income."~~

[Statutory Authority: Chapter 70.94 RCW WSR 91-05-064 (Order 90-06),  
§ 173-400-220, filed 2/19/91, effective 3/22/91.]

**WAC 173-400-230 Regulatory actions.** Ecology may take any of the following regulatory actions to enforce this chapter to meet the provisions of RCW 43.21B.300 which is incorporated by reference.

(1) **Enforcement actions by ecology—Notice to violators.** At least thirty days prior to the commencement of any formal enforcement action under RCW 70.94.430 and 70.94.431, the department of ecology shall cause written notice to be served upon the alleged violator or violators. The notice shall specify the provision of this chapter or the rule or regulation alleged to be violated, and the facts alleged to constitute a violation thereof, and may include an order that necessary corrective action be taken within a reasonable time. In lieu of an order, ecology may require that the alleged violator or violators appear before it for the purpose of providing ecology information pertaining to the violation or the charges complained of. Every notice of violation shall offer to the alleged violator an opportunity to meet with ecology prior to the commencement of enforcement action.

(2) **Civil penalties.**

(a) In addition to or as an alternate to any other penalty provided by law, any person who violates any of the provisions of chapter 70.94 or 70.120 RCW, or any of the rules in force under such chapters may incur a civil penalty in an amount as set forth in RCW 70.94.431. Each such violation shall be a separate and distinct offense, and in case of a continuing violation, each day's continuance shall be a separate and distinct violation.

Any person who fails to take action as specified by an order issued pursuant to this chapter shall be liable for a civil penalty as set forth by RCW 70.94.431 for each day of continued noncompliance.

(b) Penalties incurred but not paid shall accrue interest, beginning on the ninety-first day following the date that the penalty becomes due and payable, at the highest rate allowed by RCW 19.52.020 on the date that the penalty becomes due and payable. If violations or penalties are appealed, interest shall not begin to accrue until the thirty-first day following final resolution of the appeal.

The maximum penalty amounts established in RCW 70.94.431 may be increased annually to account for inflation as determined by the state office of the economic and revenue forecast council.

(c) Each act of commission or omission which procures, aids, or abets in the violation shall be considered a violation under the provisions of this section and subject to the same penalty. The penalties provided in this section shall be imposed pursuant to RCW 43.21B.300.

(d) All penalties recovered under this section by ecology shall be paid into the state treasury and credited to the air pollution control account established in RCW 70.94.015 or, if recovered by the authority, shall be paid into the treasury of the authority and credited to its funds. If a prior penalty for the same violation has been paid to a local authority, the penalty imposed by ecology under subsection (a) of this section shall be reduced by the amount of the payment.

(e) To secure the penalty incurred under this section, the state or the authority shall have a lien on any vessel used or operated in violation of this chapter which shall be enforced as provided in RCW 60.36.050.

~~(f) Public or private entities that are recipients or potential recipients of ecology grants, whether for air quality related activities or not, may have such grants rescinded or withheld by ecology for failure to comply with provisions of this chapter.~~

~~(g) In addition to other penalties provided by this chapter, persons knowingly under-reporting emissions or other information used to set fees, or persons required to pay emission or permit fees who are more than ninety days late with such payments may be subject to a penalty equal to three times the amount of the original fee owed.~~

~~(3) **Assurance of discontinuance.** Personnel of ecology or an authority may accept an assurance of discontinuance of any act or practice deemed in violation of this chapter. Any such assurance shall specify a time limit during which discontinuance is to be accomplished. Failure to perform the terms of any such assurance shall constitute prima facie proof of a violation of this chapter or any order issued thereunder which make the alleged act or practice unlawful for the purpose of securing an injunction or other relief from the superior court.~~

~~(4) **Restraining orders, injunctions.** Whenever any person has engaged in, or is about to engage in, any acts or practices which constitute or will constitute a violation of any provision of this chapter, the director, after notice to such person and an opportunity to comply, may petition the superior court of the county wherein the violation is alleged to be occurring or to have occurred for a restraining order or a temporary or permanent injunction or another appropriate order.~~

~~(5) **Emergency episodes.** Ecology may issue such orders as authorized by chapter 173-435 WAC via chapter 70.94 RCW, whenever an air pollution episode forecast is declared.~~

~~(6) **Compliance orders.** Ecology may issue a compliance order in conjunction with a notice of violation. The order shall require the recipient of the notice of violation either to take necessary corrective action or to submit a plan for corrective action and a date when such action will be initiated.~~

~~[Statutory Authority: Chapter 70.94 RCW WSR 93-05-044 (Order 92-34), § 173-400-230, filed 2/17/93, effective 3/20/93; WSR 91-05-064 (Order 90-06), § 173-400-230, filed 2/19/91, effective 3/22/91.]~~

~~**WAC 173-400-240 Criminal penalties.** Persons in violation of Title 173 WAC may be subject to the provisions of RCW 70.94.430.~~

~~[Statutory Authority: Chapter 70.94 RCW WSR 91-05-064 (Order 90-06), § 173-400-240, filed 2/19/91, effective 3/22/91.]~~

~~**WAC 173-400-250 Appeals.** Decisions and orders of ecology or an authority may be appealed to the pollution control hearings board pursuant to chapter 43.21B RCW and chapter 371-08 WAC.~~

~~[Statutory Authority: Chapter 70.94 RCW WSR 93-18-007 (Order 93-03), § 173-400-250, filed 8/20/93, effective 9/20/93; WSR 91-05-064 (Order 90-06), § 173-400-250, filed 2/19/91, effective 3/22/91.]~~

~~**WAC 173-400-260 Conflict of interest.** All board members and officials acting or voting on decisions affecting air pollution sources, must comply with the Federal Clean Air Act, as it pertains to conflict of interest (Section 128).~~

~~[Statutory Authority: RCW 70.94.152, 70.94.331, 70.94.860 WSR 16-12-099 (Order 16-01), § 173-400-260, filed 5/31/16, effective 7/1/16. Statutory Authority: Chapter 70.94 RCW, WSR 91-05-064 (Order 90-06), § 173-400-260, filed 2/19/91, effective 3/22/91.]~~

**WAC 173-400-560 General order of approval.** In lieu of filing a notice of construction application under WAC 173-400-110, the owner or operator may apply for coverage under a general order of approval issued under this section. Coverage under a general order of approval satisfies the requirement for new source review under RCW 70.94.152.

(1) **Issuance of general orders of approval.** A permitting authority may issue a general order of approval applicable to a specific type of emission unit or source, not including nonroad engines as defined in section 216 of the Federal Clean Air Act, subject to the conditions in this section. A general order of approval shall identify criteria by which an emission unit or source may qualify for coverage under the associated general order of approval and shall include terms and conditions under which the owner or operator agrees to install and/or operate the covered emission unit or source. At a minimum, these terms and conditions shall include:

- (a) Applicable emissions limitations and/or control requirements;
- (b) Best available control technology;
- (c) Appropriate operational restrictions, such as:
  - (i) Criteria related to the physical size of the unit(s) covered;
  - (ii) Criteria related to raw materials and fuels used;
  - (iii) Criteria related to allowed or prohibited locations; and
  - (iv) Other similar criteria determined by a permitting authority;
- (d) Monitoring, reporting and recordkeeping requirements to ensure compliance with the applicable emission limits and control requirements;
- (e) Appropriate initial and periodic emission testing requirements;
- (f) Compliance with ~~chapter 173-460 WAC,~~ WAC 173-400-112 and 173-400-113 as applicable;
- (g) Compliance with 40 C.F.R. Parts 60, 61, 62, and 63; and
- (h) The application and approval process to obtain coverage under the specific general order of approval.

(2) **Public comment.** Compliance with WAC 173-400-171 is required for a proposed new general order of approval or modification of an existing general order of approval.

(3) **Modification of general orders of approval.** A permitting authority may review and modify a general order of approval at any time. Only the permitting authority that issued a general order of approval may modify that general order of approval. Modifications to general orders of approval shall follow the procedures of this regulation and shall only take effect prospectively.

(4) **Application for coverage under a general order of approval.**

(a) In lieu of applying for an individual order of approval under WAC 173-400-110, an owner or operator of an emission unit or source may apply for and receive coverage from a permitting authority under a general order of approval if:

(i) The owner or operator of the emission unit or source applies for coverage under a general order of approval in accordance with this regulation and any conditions of the approval related to application for and granting coverage under the general order of approval;

(ii) The emission unit or source meets all the qualifications listed in the requested general order of approval;

(iii) The requested emission unit or source is not part of a new major stationary source or major modification of a major stationary source subject to the requirements of WAC 173-400-113 (3) and (4), 173-400-700 through 173-400-750 or 173-400-800 through 173-400-860; and

(iv) The requested emission unit or source does not trigger applicability of the operating permit program under chapter 173-401 WAC or trigger a required modification of an existing operating permit.

(b) Owners or operators of emission units or sources applying for coverage under a general order of approval shall do so using the forms supplied by a permitting authority and include the required fee. The application must include all information necessary to determine qualification for, and to assure compliance with, a general order of approval.

(c) An application shall be incomplete until a permitting authority has received any required fees.

(d) The owner or operator of a new source or modification of an existing source that qualifies for coverage under a general order of approval may not begin actual construction of the new source or modification until its application for coverage has been approved or accepted under the procedures established in subsection (5) of this section.

**(5) Processing applications for coverage under a general order of approval.** Each general order of approval shall include a section on how an applicant is to request coverage and how the permitting authority will grant coverage. The section of the general order of approval will include either the method in (a) or (b) of this subsection to describe the process for the applicant to be granted coverage.

(a) Within thirty days of receipt of an application for coverage under a general order of approval, the permitting authority shall notify an applicant in writing that the application is incomplete, approved, or denied. If an application is incomplete, the permitting authority shall notify an applicant of the information needed to complete the application. If an application is denied, the permitting authority shall notify an applicant of the reasons why the application is denied. Coverage under a general order of approval is effective as of the date of issuance of approval by the permitting authority.

(b) The applicant is approved for coverage under the general order of approval thirty-one days after an application for coverage is received by the permitting authority, unless the owner or operator receives a letter from the permitting authority, postmarked within thirty days of when the application for coverage was received by the permitting authority, notifying the owner or operator that the emissions unit or source does not qualify for coverage under the general order of approval. The letter denying coverage shall notify the applicant of the disqualification and the reasons why coverage is denied.

**(6) Termination of coverage under a general order of approval.** An owner or operator who has received approval of an application for coverage under a general order of approval may later request to be excluded from coverage under that general order of approval by applying to the same permitting authority for an individual order of approval, un-



der WAC 173-400-110, or for coverage under another general order of approval. If the same permitting authority issues an individual order of approval or other permit or order serving the same purpose as the original general order of approval, or approves coverage under a different general order of approval, coverage under the original general order of approval is automatically terminated, effective on the effective date of the individual order of approval, order or permit or new general order of approval.

(7) **Failure to qualify or comply.** An owner or operator who requests and is granted approval for coverage under a general order of approval shall be subject to enforcement action for establishment of a new source in violation of WAC 173-400-110 if a decision to grant coverage under a general order of approval was based upon erroneous information submitted by the applicant.

[Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-560, filed 11/28/12, effective 12/29/12; WSR 11-06-060 (Order 09-01), § 173-400-560, filed 3/1/11, effective 4/1/11. Statutory Authority: RCW 70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-560, filed 1/10/05, effective 2/10/05.]

EPA effective: 5/29/15 (80 FR 23721, 4/29/15)

## **PERMITTING OF MAJOR STATIONARY SOURCES AND MAJOR MODIFICATIONS TO MAJOR STATIONARY SOURCES**

**WAC 173-400-700 Review of major stationary sources of air pollution.** (1) The following sections are to be used by ecology when reviewing and permitting new major stationary sources and major modifications to major stationary sources located in attainment or unclassified areas in Washington.

(2) WAC 173-400-700 through 173-400-750 apply statewide except:

(a) Where the authority has received delegation of the federal PSD program from EPA or has a SIP approved PSD program.

(b) To projects under the jurisdiction of the energy facility site evaluation council site certification process pursuant to chapter 80.50 RCW.

(3) The construction of a major stationary source or major modification subject to the permitting requirements of the following section might also be subject to the permitting programs in WAC 173-400-110 and 173-400-800 through 173-400-860.

[Statutory Authority: Chapter 70.94 RCW. WSR 11-06-060 (Order 09-01), § 173-400-700, filed 3/1/11, effective 4/1/11. Statutory Authority: RCW 70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-700, filed 1/10/05, effective 2/10/05.]

EPA effective: 5/29/15 (80 FR 23721, 4/29/15)

**WAC 173-400-710 Definitions.** (1) For purposes of WAC 173-400-720 through 173-400-750 the definitions in 40 C.F.R. 52.21(b) (in effect on the date in WAC 173-400-025) must be used. Exception: The definition of "secondary emissions" as defined in WAC 173-400-030 must be used.

(2) All usage of the term "source" in WAC 173-400-710 through 173-400-750 and in 40 C.F.R. 52.21 must be interpreted to mean "stationary source" as defined in 40 C.F.R. 52.21 (b) (5). A stationary source (or source) does not include emissions resulting directly from



an internal combustion engine for transportation purposes, from a non-road engine, or a nonroad vehicle as defined in section 216 of the Federal Clean Air Act.

[Statutory Authority: RCW 70.94.152, 70.94.331, 70.94.860. WSR 16-12-099 (Order 16-01), § 173-400-710, filed 5/31/16, effective 7/1/16. Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-710, filed 11/28/12, effective 12/29/12. Statutory Authority: RCW 70.94.395 and 70.94.331. WSR 07-11-039 (Order 06-03), § 173-400-710, filed 5/8/07, effective 6/8/07. Statutory Authority: RCW 70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-710, filed 1/10/05, effective 2/10/05.]

EPA effective: 11/7/16 (81 FR 69385, 10/6/16)

**WAC 173-400-720 Prevention of significant deterioration (PSD).**

(1) No major stationary source or major modification to which the requirements of this section apply is authorized to begin actual construction without having received a PSD permit.

(2) **Early planning encouraged.** In order to develop an appropriate application, the source should engage in an early planning process to assess the needs of the facility. An opportunity for a preapplication meeting with ecology is available to any potential applicant.

(3) **Enforcement.** Ecology or the permitting authority with jurisdiction over the source under chapter 173-401 WAC, the Operating permit regulation, shall:

(a) Receive all reports required in the PSD permit;

(b) Enforce the requirement to apply for a PSD permit when one is required; and

(c) Enforce the conditions in the PSD permit.

(4) **Applicable requirements.**

(a) A PSD permit must assure compliance with the following requirements:

~~(i) WAC 173-400-113 (1) through (4);~~

~~(ii) WAC 173-400-117 - Special protection requirements for federal Class I areas;~~

~~(iii) WAC 173-400-200;~~

~~(iv) WAC 173-400-205;~~

(v) Allowable emission limits established under WAC 173-400-081 must also meet the criteria of 40 C.F.R. 52.21 (k) (1) and 52.21 (p) (1) through (4) (in effect on the date in WAC 173-400-025); and

(vi) The following subparts of 40 C.F.R. 52.21 (in effect on the date in WAC 173-400-025) are adopted. Exceptions are listed in (b) (i), (ii), (iii), and (iv) of this subsection:

| 6HFWLRQ                | 7LWOH                                                                                             |
|------------------------|---------------------------------------------------------------------------------------------------|
| 40 C.F.R. 52.21 (a)(2) | Applicability Procedures.                                                                         |
| 40 C.F.R. 52.21 (b)    | Definitions, except the definition of "secondary emissions."                                      |
| 40 C.F.R. 52.21 (c)    | Ambient air increments.                                                                           |
| 40 C.F.R. 52.21 (d)    | Ambient air ceilings.                                                                             |
| 40 C.F.R. 52.21 (h)    | Stack heights.                                                                                    |
| 40 C.F.R. 52.21 (i)    | Review of major stationary sources and major modifications - Source applicability and exemptions. |
| 40 C.F.R. 52.21 (j)    | Control technology review.                                                                        |

| 6HFWLRQ                            | 7LWOH                                                             |
|------------------------------------|-------------------------------------------------------------------|
| 40 C.F.R. 52.21 (k)                | Source impact analysis.                                           |
| 40 C.F.R. 52.21 (l)                | Air quality models.                                               |
| 40 C.F.R. 52.21 (m)                | Air quality analysis.                                             |
| 40 C.F.R. 52.21 (n)                | Source information.                                               |
| 40 C.F.R. 52.21 (o)                | Additional impact analysis.                                       |
| 40 C.F.R. 52.21 (p)(1) through (4) | Sources impacting federal Class I areas - Additional UHTXLUHPHQWV |
| 40 C.F.R. 52.21 (r)                | Source obligation.                                                |
| 40 C.F.R. 52.21 (v)                | Innovative control technology.                                    |
| 40 C.F.R. 52.21 (w)                | Permit rescission.                                                |
| 40 C.F.R. 52.21 (aa)               | Actuals Plantwide Applicability Limitation.                       |

(b) Exceptions to adopting 40 C.F.R. 52.21 by reference.

(i) Every use of the word "administrator" in 40 C.F.R. 52.21 means ecology except for the following:

(A) In 40 C.F.R. 52.21 (b)(17), the definition of federally enforceable, "administrator" means the EPA administrator.

(B) In 40 C.F.R. 52.21 (l)(2), air quality models, "administrator" means the EPA administrator.

(C) In 40 C.F.R. 52.21 (b)(43) the definition of prevention of significant deterioration program, "administrator" means the EPA administrator.

(D) In 40 C.F.R. 52.21 (b)(48)(ii)(c) related to regulations promulgated by the administrator, "administrator" means the EPA administrator.

(E) In 40 C.F.R. 52.21 (b)(50)(i) related to the definition of a regulated NSR pollutant, "administrator" means the EPA administrator.

(F) In 40 C.F.R. 52.21 (b)(37) related to the definition of re-powering, "administrator" means the EPA administrator.

(G) In 40 C.F.R. 52.21 (b)(51) related to the definition of reviewing authority, "administrator" means the EPA administrator.

(ii) Each reference in 40 C.F.R. 52.21(i) to "paragraphs (j) through (r) of this section" is amended to state "paragraphs (j) through (p)(1), (2), (3) and (4) of this section, paragraph (r) of this section, WAC 173-400-720, and 173-400-730."

(iii) The following paragraphs replace the designated paragraphs of 40 C.F.R. 52.21:

(A) In 40 C.F.R. 52.21 (b)(1)(i)(a) and (b)(1)(iii)(h), the size threshold for municipal waste incinerators is changed to 50 tons of refuse per day.

(B) 40 C.F.R. 52.21 (b)(23)(i) After the entry for municipal solid waste landfills emissions, add Ozone Depleting Substances: 100 tpy.

~~(C) 40 C.F.R. 52.21(c) after the effective date of EPA's incorporation of this section into the Washington state implementation plan, the concentrations listed in WAC 173-400-116(2) are excluded when determining increment consumption.~~

(D) 40 C.F.R. 52.21 (r)(6)

"The provisions of this paragraph (r)(6) apply with respect to any regulated NSR pollutant from projects at an existing emissions unit at a major stationary source (other than projects at a source with a PAL) in circumstances where there is a reasonable possibility that a project that is not a part of a major modification may result in a significant

emissions increase of such pollutant and the owner or operator elects to use the method specified in paragraphs 40 C.F.R. 52.21 (b)(41)(ii)(a) through (c) for calculating projected actual emissions.

- (i) Before beginning actual construction of the project, the owner or operator shall document and maintain a record of the following information:
  - (a) A description of the project;
  - (b) Identification of the emissions unit(s) whose emissions of a regulated NSR pollutant could be affected by the project; and
  - (c) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions, the projected actual emissions, the amount of emissions excluded under paragraph 40 C.F.R. 52.21 (b)(41)(ii)(c) and an explanation for why such amount was excluded, and any netting calculations, if applicable.
- (ii) The owner or operator shall submit a copy of the information set out in paragraph 40 C.F.R. 52.21 (r)(6)(i) to the permitting authority before beginning actual construction. This information may be submitted in conjunction with any NOC application required under the provisions of WAC 173-400-110. Nothing in this paragraph (r)(6)(ii) shall be construed to require the owner or operator of such a unit to obtain any PSD determination from the permitting authority before beginning actual construction.
- (iii) The owner or operator shall monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any emissions unit identified in paragraph 40 C.F.R. 52.21 (r)(6)(i)(b); and calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change, or for a period of 10 years following resumption of regular operations after the change if the project increases the design capacity of or potential to emit that regulated NSR pollutant at such emissions unit.
- (iv) The owner or operator shall submit a report to the permitting authority within 60 days after the end of each year during which records must be generated under paragraph 40 C.F.R. 52.21 (r)(6)(iii) setting out the unit's annual emissions during the calendar year that preceded submission of the report.

- (v) The owner or operator shall submit a report to the permitting authority if the annual emissions, in tons per year, from the project identified in paragraph 40 C.F.R. 52.21 (r) (6) (i), exceed the baseline actual emissions (as documented and maintained pursuant to paragraph 40 C.F.R. 52.21 (r) (6) (i) (c)), by a significant amount (as defined in paragraph 40 C.F.R. 52.21 (b) (23)) for that regulated NSR pollutant, and if such emissions differ from the preconstruction projection as documented and maintained pursuant to paragraph 40 C.F.R. 52.21 (r) (6) (i) (c). Such report shall be submitted to the permitting authority within 60 days after the end of such year. The report shall contain the following:
  - (a) The name, address and telephone number of the major stationary source;
  - (b) The annual emissions as calculated pursuant to paragraph (r) (6) (iii) of this section; and
  - (c) Any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).
- (vi) A "reasonable possibility" under this subsection occurs when the owner or operator calculates the project to result in either:
  - (a) A projected actual emissions increase of at least fifty percent of the amount that is a "significant emissions increase," (without reference to the amount that is a significant net emissions increase), for the regulated NSR pollutant; or
  - (b) A projected actual emissions increase that, added to the amount of emissions excluded under the definition of projected actual emissions sums to at least fifty percent of the amount that is a "significant emissions increase," (without reference to the amount that is a significant net emissions increase), for the regulated NSR pollutant. For a project for which a reasonable possibility occurs only within the meaning of (r) (6) (vi) (b) of this subsection, and not also within the meaning of (r) (6) (vi) (a) of this subsection, then the provisions of (r) (6) (vi) (ii) through (v) of this subsection do not apply to the project."

(E) 40 C.F.R. 52.21 (r) (7) "The owner or operator of the source shall submit the information required to be documented and maintained pursuant to paragraphs 40 C.F.R. 52.21 (r) (6) (iv) and (v) annually within 60 days after the anniversary date of the original analysis. The original analysis and annual reviews shall also be available for review upon a request for inspection by the permitting authority or the general public pursuant to the requirements contained in 40 C.F.R. 70.4 (b) (3) (viii)."

(F) 40 C.F.R. 52.21 (aa) (2) (ix) "PAL permit means the PSD permit, an ecology issued order of approval issued under WAC 173-400-110, or regulatory order issued under WAC 173-400-091 issued by ecology that establishes a PAL for a major stationary source."

(G) 40 C.F.R. 52.21 (aa) (5) "Public participation requirements for PALs. PALs for existing major stationary sources shall be established, renewed, or expired through the public participation process in WAC 173-400-171. A request to increase a PAL shall be processed in

accordance with the application processing and public participation process in WAC 173-400-730 and 173-400-740."

(H) 40 C.F.R. 52.21 (aa)(9)(i)(b) "Ecology, after consultation with the permitting authority, shall decide whether and how the PAL allowable emissions will be distributed and issue a revised order, order of approval or PSD permit incorporating allowable limits for each emissions unit, or each group of emissions units, as ecology determines is appropriate."

(I) 40 C.F.R. 52.21 (aa)(14) "Reporting and notification requirements. The owner or operator shall submit semiannual monitoring reports and prompt deviation reports to the permitting authority in accordance with the requirements in chapter 173-401 WAC. The reports shall meet the requirements in paragraphs 40 C.F.R. 52.21 (aa)(14)(i) through (iii)."

(J) 40 C.F.R. 52.21 (aa)(14)(ii) "Deviation report. The major stationary source owner or operator shall promptly submit reports of any deviations or exceedance of the PAL requirements, including periods where no monitoring is available. A report submitted pursuant to WAC 173-401-615 (3)(b) and within the time limits prescribed shall satisfy this reporting requirement. The reports shall contain the information found at WAC 173-401-615(3)."

(iv) 40 C.F.R. 52.21 (r)(2) is not adopted.

[Statutory Authority: RCW 70.94.152, 70.94.331, 70.94.860. WSR 16-12-099 (Order 16-01), § 173-400-720, filed 5/31/16, effective 7/1/16. Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-720, filed 11/28/12, effective 12/29/12; WSR 11-17-037 (Order 11-04), § 173-400-720, filed 8/10/11, effective 9/10/11; WSR 11-06-060 (Order 09-01), § 173-400-720, filed 3/1/11, effective 4/1/11. Statutory Authority: RCW 70.94.395 and 70.94.331. WSR 07-11-039 (Order 06-03), § 173-400-720, filed 5/8/07, effective 6/8/07. Statutory Authority: RCW 70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-720, filed 1/10/05, effective 2/10/05.]

EPA effective: 11/7/16 (81 FR 69385, 10/6/16)

**WAC 173-400-730 Prevention of significant deterioration application processing procedures. (1) Application submittal.**

(a) The applicant shall submit an application that provides complete information necessary for ecology to determine compliance with all PSD program requirements.

(b) The applicant shall submit complete copies of its PSD application or an application to increase a PAL, distributed in the following manner:

(i) Three copies to ecology: Air Quality Program, P.O. Box 47600, Olympia, WA 98504-7600.

(ii) One copy to each of the following federal land managers:

(A) U.S. Department of the Interior - National Park Service; and

(B) U.S. Department of Agriculture - U.S. Forest Service.

(iii) One copy to the permitting authority with authority over the source under chapter 173-401 WAC.

(iv) One copy to EPA.

(c) Application submittal and processing for the initial request, renewal or expiration of a PAL under 40 C.F.R. 52.21(aa) shall be done as provided in 40 C.F.R. 52.21(aa)(3) through (5) (in effect on the date in WAC 173-400-025). Exception: Public participation must comply with WAC 173-400-740.

**(2) Application processing.**

(a) Completeness determination.

(i) Within thirty days after receiving a PSD permit application, ecology shall either notify the applicant in writing that the application is complete or notify the applicant in writing of all additional information necessary to complete the application. Ecology may request additional information clarifying aspects of the application after it has been determined to be complete.

(ii) The effective date of the application is the date on which ecology notifies the applicant that the application is complete pursuant to (a)(i) of this subsection.

(iii) If an applicant fails or refuses to correct deficiencies in the application, the permit may be denied and appropriate enforcement action taken.

(iv) The permitting authority shall send a copy of the completeness determination to the responsible federal land manager.

(b) Preparation and issuance of the preliminary determination.

(i) When the application has been determined to be complete, ecology shall begin developing the preliminary determination to approve or deny the application.

(ii) As expeditiously as possible after receipt of a complete application, ecology shall provide the applicant with a preliminary determination along with a technical support document and a public notice.

(c) Issuance of the final determination.

(i) Ecology shall make no final decision until the public comment period has ended and all comments received during the public comment period have been considered.

(ii) Within one year of the date of receipt of the complete application and as expeditiously as possible after the close of the public comment period, or hearing if one is held, ecology shall prepare and issue the final determination.

(d) Once the PSD program set forth in WAC 173-400-700 through 173-400-750 is incorporated into the Washington SIP, the effective date of a determination will be either the date of issuance of the final determination, or a later date if specified in the final determination.

Until the PSD program set forth in WAC 173-400-700 through 173-400-750 is incorporated into the Washington SIP, the effective date of a final determination is one of the following dates:

(i) If no comments on the preliminary determination were received, the date of issuance; or

(ii) If comments were received, thirty days after receipt of the final determination; or

(iii) A later date as specified within the PSD permit approval.

(3) **PSD technical support document.** Ecology shall develop a technical support document for each preliminary PSD determination. The preliminary technical support document will be updated prior to issuance of the final determination to reflect changes to the final determination based on comments received. The technical support document shall include the following information:

(a) A brief description of the major stationary source, major modification, or activity subject to review;

(b) The physical location, ownership, products and processes involved in the major stationary source or major modification subject to review;

(c) The type and quantity of pollutants proposed to be emitted into the air;



(d) A brief summary of the BACT options considered and the reasons why the selected BACT level of control was selected;

(e) A brief summary of the basis for the permit approval conditions;

(f) A statement on whether the emissions will or will not cause a state and national ambient air quality standard to be exceeded;

(g) The degree of increment consumption expected to result from the source or modification;

(h) An analysis of the impacts on air quality related values in federal Class I areas and other Class I areas affected by the project; and

(i) An analysis of the impacts of the proposed emissions on visibility in any federal Class I area following the requirements in WAC 173-400-117.

(4) **Appeals.** A PSD permit, any conditions contained in a PSD permit, or the denial of PSD permit may be appealed to the pollution control hearings board as provided in chapter 43.21B RCW. A PSD permit issued under the terms of a delegation agreement can be appealed to the EPA's environmental appeals board as provided in 40 C.F.R. 124.13 and 40 C.F.R. 124.19.

(5) **Construction time limitations.**

(a) Approval to construct or modify a major stationary source becomes invalid if construction is not commenced within eighteen months of the effective date of the approval, if construction is discontinued for a period of eighteen months or more, or if construction is not completed within a reasonable time. The time period between construction of the approved phases of a phased construction project cannot be extended. Each phase must commence construction within eighteen months of the projected and approved commencement date.

(b) Ecology may extend the eighteen-month effective period of a PSD permit upon a satisfactory showing that an extension is justified. A request to extend the effective time to begin or complete actual construction under a PSD permit may be submitted. The request may result from the cessation of on-site construction before completion or failure to begin actual construction of the project(s) covered by the PSD permit.

(i) Request requirements.

(A) A written request for the extension, submitted by the PSD permit holder, as soon as possible prior to the expiration of the current PSD permit.

(B) An evaluation of BACT and an updated ambient impact, including an increment analysis, for all pollutants subject to the approval conditions in the PSD permit.

(ii) Duration of extensions.

(A) No single extension of time shall be longer than eighteen months.

(B) The cumulative time prior to beginning actual construction under the original PSD permit and all approved time extensions shall not exceed fifty-four months.

(iii) Issuance of an extension.

(A) Ecology may approve and issue an extension of the current PSD permit.

(B) The extension of approval shall reflect any revised BACT limitations based on the evaluation of BACT presented in the request for extension and other information available to ecology.

(C) The issuance of an extension is subject to the public involvement requirements in WAC 173-400-740.



(iv) For the extension of a PSD permit, ecology must prepare a technical support document consistent with WAC 173-400-730(3) only to the extent that those criteria apply to a request to extend the construction time limitation.

[Statutory Authority: RCW 70.94.152, 70.94.331, 70.94.860. WSR 16-12-099 (Order 16-01), § 173-400-730, filed 5/31/16, effective 7/1/16. Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-730, filed 11/28/12, effective 12/29/12; WSR 11-06-060 (Order 09-01), § 173-400-730, filed 3/1/11, effective 4/1/11. Statutory Authority: RCW 70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-730, filed 1/10/05, effective 2/10/05.]

EPA effective: 11/7/16 (81 FR 69385, 10/6/16)

**WAC 173-400-740 PSD permitting public involvement requirements.**

(1) **Actions requiring notification of the public.** Ecology must provide public notice before approving or denying any of the following types of actions related to implementation of the PSD program contained in WAC 173-400-720:

(a) Any preliminary determination to approve or disapprove a PSD permit application; or

(b) An extension of the time to begin construction or suspend construction under a PSD permit; or

(c) A revision to a PSD permit, except an administrative amendment to an existing permit; or

(d) Use of a modified or substituted model in Appendix W of 40 C.F.R. Part 51 (in effect on the date in WAC 173-400-025) as part of review of air quality impacts.

(2) **Notification of the public.** As expeditiously as possible after the receipt of a complete PSD application, and as expeditiously as possible after receipt of a request for extension of the construction time limit under WAC 173-400-730(6) or after receipt of a nonadministrative revision to a PSD permit under WAC 173-400-750, ecology shall:

(a) Administrative record. Make available for public inspection in at least one location in the vicinity where the proposed source would be constructed, or for revisions to a PSD permit where the permittee exists, a copy of the information submitted by the applicant, and any applicable preliminary determinations, including analyses of the effects on air quality and air quality related values, considered in making the preliminary determination. Ecology may comply with this requirement by making these materials available on ecology's web site or at a physical location.

(i) Some materials comprising the administrative record (such as air quality modeling data) may be too large to post on a web site but may be made available as part of the record either in hard copy or on a data storage device.

(ii) Exemptions from this requirement include information protected from disclosure under any applicable law, including, but not limited to, RCW 70.94.205 and chapter 173-03 WAC.

(b) Notify the public.

(i) Public notice must be posted on ecology's web site for a minimum of thirty days. Day one of the public comment period begins on the next calendar day after ecology posts the public notice.

(ii) The following information must be posted for the duration of the public comment period:

(A) Public notice elements in subsection (3) of this section;

(B) PSD draft permit;

- (C) PSD technical support document; and
- (D) Information on how to access the administrative record.
- (iii) If ecology grants a request to extend the public comment period, ecology must:
  - (A) Post the extension notice on the same web page where the original notice was posted;
  - (B) Specify the closing date of the extended comment period in the extension notice; and
  - (C) Distribute a copy of the extension notice by electronic means or via the United States postal service to whomever requested the extension and the organizations and individuals listed in (c) and (d) of this subsection.
- (iv) If a hearing is held, the public comment period must extend through the hearing date and comply with the notice requirements in subsection (4)(c) of this section.
- (v) If ecology determines a supplemental notice is appropriate, the applicant or other initiator of the action must pay the cost of providing this supplemental public notice. Supplemental notice may include, but is not limited to, publication in a newspaper of general circulation in the area of the proposed project.
- (c) Distribute by electronic means or via the United States postal service a copy of the public notice to:
  - (i) Any Indian governing body whose lands may be affected by emissions from the project;
  - (ii) The chief executive of the city where the project is located;
  - (iii) The chief executive of the county where the project is located;
  - (iv) Individuals or organizations that requested notification of the specific project proposal;
  - (v) Other individuals who requested notification of PSD permits;
  - (vi) Any state within 100 km of the proposed project.
- (d) Distribute by electronic means or via the United States postal service a copy of the public notice, PSD preliminary determination, and the technical support document to:
  - (i) The applicant;
  - (ii) The affected federal land manager;
  - (iii) EPA Region 10;
  - (iv) The permitting authority with authority over the source under chapter 173-401 WAC; and
  - (v) Individuals or organizations who request a copy.
- (3) **Public notice content.** The public notice shall contain at least the following information:
  - (a) The name and address of the applicant;
  - (b) The location of the proposed project;
  - (c) A brief description of the project proposal;
  - (d) The preliminary determination to approve or disapprove the application;
  - (e) How much increment is expected to be consumed by this project;
  - (f) The name, address, and telephone number of the person to contact for further information;
  - (g) A brief explanation of how to comment on the project;
  - (h) An explanation on how to request a public hearing;
  - (i) The start date and end date of the public comment period consistent with subsection (2)(b)(i) of this section;

(j) A statement that a public hearing may be held if ecology determines within the public comment period that significant public interest exists;

(k) The length of the public comment period in the event of a public hearing; and

(l) For projects subject to special protection requirements for federal Class I areas, in WAC 173-400-117, and where ecology disagrees with the analysis done by the federal land manager, ecology shall explain its decision in the public notice or state that an explanation of the decision appears in the technical support document for the proposed approval or denial.

**(4) Public hearings.**

(a) The applicant, any interested governmental entity, any group, or any person may request a public hearing within the public comment period established consistent with subsection (2)(b)(i) of this section. A request must indicate the interest of the entity filing it and why a hearing is warranted. Whether a request for a hearing is filed or not, ecology may hold a public hearing if it determines significant public interest exists. Ecology will determine the location, date, and time of the public hearing.

(b) Notification of a public hearing will be accomplished per the requirements of WAC 173-400-740(2).

(c) The public must be notified at least thirty days prior to the date of the hearing (or first of a series of hearings).

(5) **Consideration of public comments.** Ecology shall make no final decision on any application or action of any type described in subsection (1) of this section until the public comment period has ended and any comments received during the public comment period have been considered. Ecology shall make all public comments available for public inspection at the same web site where the preconstruction information on the proposed major source or major modification was made available.

**(6) Issuance of a final determination.**

(a) The final approval or disapproval determination must be made within one year of receipt of a complete application and must include the following:

(i) A copy of the final PSD permit or the determination to deny the permit;

(ii) A summary of the comments received;

(iii) Ecology's response to those comments;

(iv) A description of what approval conditions changed from the preliminary determination; and

(v) A cover letter that includes an explanation of how the final determination may be appealed.

(b) Ecology shall post the final determination on the same web page where the draft permit and public notice was posted according to subsection (2)(b) of this section.

(c) Ecology shall distribute by electronic means or via the United States postal service a copy of the cover letter that accompanies the final determination to:

(i) Individuals or organizations that requested notification of the specific project proposal; and

(ii) Other individuals who requested notification of PSD permits.

(d) Ecology shall distribute a copy of the final determination to:

(i) The applicant;

(ii) U.S. Department of the Interior - National Park Service;

(iii) U.S. Department of Agriculture - Forest Service;

- (iv) EPA Region 10;
- (v) The permitting authority with authority over the source under chapter 173-401 WAC; and
- (vi) Any person who commented on the preliminary determination.

[Statutory Authority: Chapter 70.94 RCW. WSR 18-17-111 (Order 15-07), § 173-400-740, filed 8/16/18, effective 9/16/18. Statutory Authority: RCW 70.94.152, 70.94.331, 70.94.860. WSR 16-12-099 (Order 16-01), § 173-400-740, filed 5/31/16, effective 7/1/16. Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-740, filed 11/28/12, effective 12/29/12. Statutory Authority: RCW 70.94.152. WSR 05-03-033 (Order 03-07), § 173-400-740, filed 1/10/05, effective 2/10/05.]

EPA effective: 3/25/20 (85 FR 10301, 2/24/20)

**WAC 173-400-750 Revisions to PSD permits.** (1) The owner or operator may request, at any time, a change in conditions of a PSD permit and ecology may approve the request provided ecology finds that:

(a) The change in conditions will not cause the source to exceed an emissions standard established by regulation;

(b) No ambient air quality standard or PSD increment will be exceeded as a result of the change;

(c) The change will not adversely impact the ability of ecology or the authority to determine compliance with an emissions standard;

(d) The revised PSD permit will continue to require BACT for each new or modified emission unit approved by the original PSD permit; and

(e) The revised PSD permit continues to meet the requirements of WAC 173-400-800 through 173-400-860, and 173-400-113, as applicable.

(2) A request to revise a PSD permit must be acted upon using the timelines found in WAC 173-400-730. The fee schedule found in chapter 173-455 WAC also applies.

(3) All revisions to PSD permits are subject to public involvement except for the following administrative revisions:

(a) Change of the owner or operator's business name and/or mailing address;

(b) Corrections to typographical errors;

(c) Revisions to compliance monitoring methods that provide for more frequent monitoring, replace a periodic monitoring requirement with a continuous monitoring, result in replacement of a manual emission testing method with an instrumental method, or other similar changes that based on ecology's technical evaluation of the proposal, do not reduce the ability of the permittee, the public, the permitting authority, EPA, or ecology to determine compliance with the emission limitations;

(d) Revisions to reporting requirements contained in a PSD permit to coordinate reporting with reporting requirements contained in the air operating permit issued to the source or that result in more frequent reporting by the permittee; or

(e) Any other revision, similar to those listed above, that based on ecology's technical evaluation of the proposal, does not reduce the stringency of the emission limitations in the PSD permit or the ability of ecology, the permitting authority, EPA, or the public to determine compliance with the approval conditions in the PSD permit.

[Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-750, filed 11/28/12, effective 12/29/12; WSR 11-06-060 (Order 09-01), § 173-400-750, filed 3/1/11, effective 4/1/11. Statutory

EPA effective: 5/29/15 (80 FR 23721, 4/29/15)

**WAC 173-400-800 Major stationary source and major modification in a nonattainment area.** WAC 173-400-800 through 173-400-860 apply statewide except where a permitting authority has a permitting program for major stationary sources in a nonattainment area incorporated into the Washington state implementation plan as replacement for these sections.

These requirements apply to any new major stationary source or major modification of an existing major stationary source located in a designated nonattainment area that is major for the pollutant or pollutants for which the area is designated as not in attainment of one or more national ambient air quality standards.

[Statutory Authority: Chapter 70.94 RCW. WSR 11-06-060 (Order 09-01), § 173-400-800, filed 3/1/11, effective 4/1/11.]

EPA effective: 12/8/14 (79 FR 66291, 11/7/14)

**WAC 173-400-810 Major stationary source and major modification definitions.** The definitions in this section must be used in the major stationary source nonattainment area permitting requirements in WAC 173-400-800 through 173-400-860. If a term is defined differently in the federal program requirements for issuance, renewal and expiration of a Plant Wide Applicability Limitation (WAC 173-400-850), then that definition must be used for purposes of the Plant Wide Applicability Limitation program.

(1) Actual emissions means:

(a) The actual rate of emissions of a regulated NSR pollutant from an emissions unit, as determined in accordance with (b) through (d) of this subsection. This definition does not apply when calculating whether a significant emissions increase has occurred, or for establishing a PAL under WAC 173-400-850. Instead, "projected actual emissions" and "baseline actual emissions" as defined in subsections (2) and (23) of this section apply for those purposes.

(b) In general, actual emissions as of a particular date shall equal the average rate, in tons per year, at which the unit actually emitted the pollutant during a consecutive twenty-four-month period which precedes the particular date and which is representative of normal source operation. The permitting authority shall allow the use of a different time period upon a determination that it is more representative of normal source operation. Actual emissions shall be calculated using the unit's actual operating hours, production rates, and types of materials processed, stored, or combusted during the selected time period.

(c) The permitting authority may presume that source-specific allowable emissions for the unit are equivalent to the actual emissions of the unit.

(d) For any emissions unit that has not begun normal operations on the particular date, actual emissions shall equal the potential to emit of the unit on that date.

(2) Baseline actual emissions means the rate of emissions, in tons per year, of a regulated NSR pollutant, as determined in accordance with (a) through (d) of this subsection.

(a) For any existing electric utility steam generating unit, baseline actual emissions means the average rate, in tons per year, at



which the unit actually emitted the pollutant during any consecutive twenty-four-month period selected by the owner or operator within the five-year period immediately preceding when the owner or operator begins actual construction of the project. The permitting authority shall allow the use of a different time period upon a determination that it is more representative of normal source operation.

(i) The average rate shall include emissions associated with startups, shutdowns, and malfunctions; and, for an emissions unit that is part of one of the source categories listed in subsection (14)(e) of this section, the definition of major stationary source, or for an emissions unit that is located at a major stationary source that belongs to one of the listed source categories, the average rate shall include fugitive emissions (to the extent quantifiable).

(ii) The average rate shall be adjusted downward to exclude any noncompliant emissions that occurred while the source was operating above any emission limitation that was legally enforceable during the consecutive twenty-four-month period.

(iii) For a regulated NSR pollutant, when a project involves multiple emissions units, only one consecutive twenty-four-month period must be used to determine the baseline actual emissions for the emissions units being changed. A different consecutive twenty-four-month period can be used for each regulated NSR pollutant.

(iv) The average rate shall not be based on any consecutive twenty-four-month period for which there is inadequate information for determining annual emissions, in tons per year, and for adjusting this amount if required by (a)(ii) of this subsection.

(b) For an existing emissions unit (other than an electric utility steam generating unit), baseline actual emissions means the average rate, in tons per year, at which the emissions unit actually emitted the pollutant during any consecutive twenty-four-month period selected by the owner or operator within the ten-year period immediately preceding either the date the owner or operator begins actual construction of the project, or the date a complete permit application is received by the permitting authority for a permit required either under WAC 173-400-800 through 173-400-860 or under a plan approved by EPA, whichever is earlier, except that the ten-year period shall not include any period earlier than November 15, 1990.

(i) The average rate shall include emissions associated with startups, shutdowns, and malfunctions; and, for an emissions unit that is part of one of the source categories listed in subsection (14)(e) of this section, the definition of major stationary source, or for an emissions unit that is located at a major stationary source that belongs to one of the listed source categories, the average rate shall include fugitive emissions (to the extent quantifiable).

(ii) The average rate shall be adjusted downward to exclude any noncompliant emissions that occurred while the source was operating above an emission limitation that was legally enforceable during the consecutive twenty-four-month period.

(iii) The average rate shall be adjusted downward to exclude any emissions that would have exceeded an emission limitation with which the major stationary source must currently comply, had such major stationary source been required to comply with such limitations during the consecutive twenty-four-month period. However, if an emission limitation is part of a maximum achievable control technology standard that EPA proposed or promulgated under 40 C.F.R. Part 63, the baseline actual emissions need only be adjusted if the state has taken credit for such emissions reductions in an attainment demonstration or main-

tenance plan as part of the demonstration of attainment or as reasonable further progress to attain the NAAQS.

(iv) For a regulated NSR pollutant, when a project involves multiple emissions units, only one consecutive twenty-four-month period must be used to determine the baseline actual emissions for the emissions units being changed. A different consecutive twenty-four-month period can be used for each regulated NSR pollutant.

(v) The average rate shall not be based on any consecutive twenty-four-month period for which there is inadequate information for determining annual emissions, in tons per year, and for adjusting this amount if required under (b) (ii) and (iii) of this subsection.

(c) For a new emissions unit, the baseline actual emissions for purposes of determining the emissions increase that will result from the initial construction and operation of such unit shall equal zero; and thereafter, for all other purposes, shall equal the unit's potential to emit. In the latter case, fugitive emissions, to the extent quantifiable, shall be included only if the emissions unit is part of one of the source categories listed in subsection (14)(e) of this section, the definition of major stationary source, or if the emissions unit is located at a major stationary source that belongs to one of the listed source categories.

(d) For a PAL for a major stationary source, the baseline actual emissions shall be calculated for existing electric utility steam generating units in accordance with the procedures contained in (a) of this subsection, for other existing emissions units in accordance with the procedures contained in (b) of this subsection, and for a new emissions unit in accordance with the procedures contained in (c) of this subsection, except that fugitive emissions (to the extent quantifiable) shall be included regardless of the source category.

(3) Building, structure, facility, or installation means all of the pollutant-emitting activities which belong to the same industrial grouping, are located on one or more contiguous or adjacent properties, and are under the control of the same person (or persons under common control) except the activities of any vessel. Pollutant-emitting activities shall be considered as part of the same industrial grouping if they belong to the same major group (i.e., which have the same two-digit code) as described in the *Standard Industrial Classification Manual*, 1972, as amended by the 1977 Supplement (U.S. Government Printing Office stock numbers 4101-0065 and 003-005-00176-0, respectively).

(4) Clean coal technology means any technology, including technologies applied at the precombustion, combustion, or post combustion stage, at a new or existing facility which will achieve significant reductions in air emissions of sulfur dioxide or oxides of nitrogen associated with the utilization of coal in the generation of electricity, or process steam which was not in widespread use as of November 15, 1990.

(5) Clean coal technology demonstration project means a project using funds appropriated under the heading "Department of Energy-Clean Coal Technology," up to a total amount of two and one-half billion dollars for commercial demonstration of clean coal technology, or similar projects funded through appropriations for the Environmental Protection Agency. The federal contribution for a qualifying project shall be at least twenty percent of the total cost of the demonstration project.

(6) Construction means any physical change or change in the method of operation (including fabrication, erection, installation, demo-



lition, or modification of an emissions unit) that would result in a change in emissions.

(7) Continuous emissions monitoring system (CEMS) means all of the equipment that may be required to meet the data acquisition and availability requirements of this section, to sample, condition (if applicable), analyze, and provide a record of emissions on a continuous basis.

(8) Continuous parameter monitoring system (CPMS) means all of the equipment necessary to meet the data acquisition and availability requirements of this section, to monitor process and control device operational parameters (for example, control device secondary voltages and electric currents) and other information (for example, gas flow rate, O<sub>2</sub> or CO<sub>2</sub> concentrations), and to record average operational parameter value(s) on a continuous basis.

(9) Continuous emissions rate monitoring system (CERMS) means the total equipment required for the determination and recording of the pollutant mass emissions rate (in terms of mass per unit of time).

(10) Electric utility steam generating unit means any steam electric generating unit that is constructed for the purpose of supplying more than one-third of its potential electric output capacity and more than 25 MW electrical output to any utility power distribution system for sale. Any steam supplied to a steam distribution system for the purpose of providing steam to a steam-electric generator that would produce electrical energy for sale is also considered in determining the electrical energy output capacity of the affected facility.

(11) Emissions unit means any part of a stationary source that emits or would have the potential to emit any regulated NSR pollutant and includes an electric steam generating unit. For purposes of this section, there are two types of emissions units:

(a) A new emissions unit is any emissions unit which is (or will be) newly constructed and which has existed for less than two years from the date such emissions unit first operated.

(b) An existing emissions unit is any emissions unit that is not a new emissions unit. A replacement unit, as defined in subsection (25) of this section is an existing emissions unit.

(12) Fugitive emissions means those emissions which could not reasonably pass through a stack, chimney, vent or other functionally equivalent opening. Fugitive emissions, to the extent quantifiable, are addressed as follows for the purposes of this section:

(a) In determining whether a stationary source or modification is major, fugitive emissions from an emissions unit are included only if the emissions unit is part of one of the source categories listed in subsection (14)(e) of this section, the definition of major stationary source, or the emissions unit is located at a stationary source that belongs to one of those source categories. Fugitive emissions are not included for those emissions units located at a facility whose primary activity is not represented by one of the source categories listed in subsection (14)(e) of this section, the definition of major stationary source and that are not, by themselves, part of a listed source category.

(b) For purposes of determining the net emissions increase associated with a project, an increase or decrease in fugitive emissions is creditable only if it occurs at an emissions unit that is part of one of the source categories listed in subsection (14)(e) of this section, the definition of major stationary source, or if the emission unit is located at a major stationary source that belongs to one of

the listed source categories. Fugitive emission increases or decreases are not creditable for those emissions units located at a facility whose primary activity is not represented by one of the source categories listed in subsection (14)(e) of this section, the definition of major stationary source, and that are not, by themselves, part of a listed source category.

(c) For purposes of determining the projected actual emissions of an emissions unit after a project, fugitive emissions are included only if the emissions unit is part of one of the source categories listed in subsection (14)(e) of this section, the definition of major stationary source, or if the emission unit is located at a major stationary source that belongs to one of the listed source categories. Fugitive emissions are not included for those emissions units located at a facility whose primary activity is not represented by one of the source categories listed in subsection (14)(e) of this section, the definition of major stationary source, and that are not, by themselves, part of a listed source category.

(d) For purposes of determining the baseline actual emissions of an emissions unit, fugitive emissions are included only if the emissions unit is part of one of the source categories listed in subsection (14)(e) of this section, the definition of major stationary source, or if the emission unit is located at a major stationary source that belongs to one of the listed source categories, except that, for a PAL, fugitive emissions shall be included regardless of the source category. With the exception of PALs, fugitive emissions are not included for those emissions units located at a facility whose primary activity is not represented by one of the source categories listed in subsection (14)(e) of this section, the definition of major stationary source, and that are not, by themselves, part of a listed source category.

(e) In calculating whether a project will cause a significant emissions increase, fugitive emissions are included only for those emissions units that are part of one of the source categories listed in subsection (14)(e) of this section, the definition of major stationary source, or for any emissions units that are located at a major stationary source that belongs to one of the listed source categories. Fugitive emissions are not included for those emissions units located at a facility whose primary activity is not represented by one of the source categories listed in subsection (14)(e) of this section, the definition of major stationary source, and that are not, by themselves, part of a listed source category.

(f) For purposes of monitoring and reporting emissions from a project after normal operations have been resumed, fugitive emissions are included only for those emissions units that are part of one of the source categories listed in subsection (14)(e) of this section, the definition of major stationary source, or for any emissions units that are located at a major stationary source that belongs to one of the listed source categories. Fugitive emissions are not included for those emissions units located at a facility whose primary activity is not represented by one of the source categories listed in subsection (14)(e) of this section, the definition of major stationary source, and that are not, by themselves, part of a listed source category.

(g) For all other purposes of this section, fugitive emissions are treated in the same manner as other, nonfugitive emissions. This includes, but is not limited to, the treatment of fugitive emissions for offsets (see WAC 173-400-840(7)) and for PALs (see WAC 173-400-850).

(13) Lowest achievable emission rate (LAER) means, for any source, the more stringent rate of emissions based on the following:

(a) The most stringent emissions limitation which is contained in the implementation plan of any state for such class or category of stationary source, unless the owner or operator of the proposed stationary source demonstrates that such limitations are not achievable; or

(b) The most stringent emissions limitation which is achieved in practice by such class or category of stationary sources. This limitation, when applied to a modification, means the lowest achievable emissions rate for the new or modified emissions units within a stationary source. In no event shall the application of the term permit a proposed new or modified stationary source to emit any pollutant in excess of the amount allowable under an applicable new source standard of performance.

(14)(a) Major stationary source means any stationary source of air pollutants that emits, or has the potential to emit, one hundred tons per year or more of any regulated NSR pollutant, except that lower emissions thresholds apply in areas subject to sections 181-185B, sections 186 and 187, or sections 188-190 of the Federal Clean Air Act. In those areas the following thresholds apply:

(i) Fifty tons per year of volatile organic compounds in any serious ozone nonattainment area;

(ii) Fifty tons per year of volatile organic compounds in an area within an ozone transport region, except for any severe or extreme ozone nonattainment area;

(iii) Twenty-five tons per year of volatile organic compounds in any severe ozone nonattainment area;

(iv) Ten tons per year of volatile organic compounds in any extreme ozone nonattainment area;

(v) Fifty tons per year of carbon monoxide in any serious nonattainment area for carbon monoxide, where stationary sources contribute significantly to carbon monoxide levels in the area (as determined under rules issued by EPA);

(vi) Seventy tons per year of PM-10 in any serious nonattainment area for PM-10.

(b) For the purposes of applying the requirements of WAC 173-400-830 to stationary sources of nitrogen oxides located in an ozone nonattainment area or in an ozone transport region, any stationary source which emits, or has the potential to emit, one hundred tons per year or more of nitrogen oxides emissions, except that the emission thresholds in (b)(i) through (vi) of this subsection shall apply in areas subject to sections 181-185B of the Federal Clean Air Act.

(i) One hundred tons per year or more of nitrogen oxides in any ozone nonattainment area classified as marginal or moderate.

(ii) One hundred tons per year or more of nitrogen oxides in any ozone nonattainment area classified as a transitional, submarginal, or incomplete or no data area, when such area is located in an ozone transport region.

(iii) One hundred tons per year or more of nitrogen oxides in any area designated under section 107(d) of the Federal Clean Air Act as attainment or unclassifiable for ozone that is located in an ozone transport region.

(iv) Fifty tons per year or more of nitrogen oxides in any serious nonattainment area for ozone.

(v) Twenty-five tons per year or more of nitrogen oxides in any severe nonattainment area for ozone.

(vi) Ten tons per year or more of nitrogen oxides in any extreme nonattainment area for ozone.

(c) Any physical change that would occur at a stationary source not qualifying under (a) and (b) of this subsection as a major stationary source, if the change would constitute a major stationary source by itself.

(d) A major stationary source that is major for volatile organic compounds shall be considered major for ozone.

(e) The fugitive emissions of a stationary source shall not be included in determining for any of the purposes of subsection (14) of this section whether it is a major stationary source, unless the source belongs to one of the following categories of stationary sources:

- (i) Coal cleaning plants (with thermal dryers);
- (ii) Kraft pulp mills;
- (iii) Portland cement plants;
- (iv) Primary zinc smelters;
- (v) Iron and steel mills;
- (vi) Primary aluminum ore reduction plants;
- (vii) Primary copper smelters;
- (viii) Municipal incinerators capable of charging more than fifty tons of refuse per day;
- (ix) Hydrofluoric, sulfuric, or nitric acid plants;
- (x) Petroleum refineries;
- (xi) Lime plants;
- (xii) Phosphate rock processing plants;
- (xiii) Coke oven batteries;
- (xiv) Sulfur recovery plants;
- (xv) Carbon black plants (furnace process);
- (xvi) Primary lead smelters;
- (xvii) Fuel conversion plants;
- (xviii) Sintering plants;
- (xix) Secondary metal production plants;
- (xx) Chemical process plants - The term chemical processing plant shall not include ethanol production facilities that produce ethanol by natural fermentation included in NAICS codes 325193 or 312140;
- (xxi) Fossil-fuel boilers (or combination thereof) totaling more than two hundred fifty million British thermal units per hour heat input;
- (xxii) Petroleum storage and transfer units with a total storage capacity exceeding three hundred thousand barrels;
- (xxiii) Taconite ore processing plants;
- (xxiv) Glass fiber processing plants;
- (xxv) Charcoal production plants;
- (xxvi) Fossil fuel-fired steam electric plants of more than two hundred fifty million British thermal units per hour heat input; and
- (xxvii) Any other stationary source category which, as of August 7, 1980, is being regulated under section 111 or 112 of the Federal Clean Air Act.

(15)(a) Major modification means any physical change in or change in the method of operation of a major stationary source that would result in:

- (i) A significant emissions increase of a regulated NSR pollutant; and
- (ii) A significant net emissions increase of that pollutant from the major stationary source.

(b) Any significant emissions increase from any emissions units or net emissions increase at a major stationary source that is significant for volatile organic compounds shall be considered significant for ozone.

(c) A physical change or change in the method of operation shall not include:

(i) Routine maintenance, repair and replacement;

(ii) Use of an alternative fuel or raw material by reason of an order under sections 2 (a) and (b) of the Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;

(iii) Use of an alternative fuel by reason of an order or rule section 125 of the Federal Clean Air Act;

(iv) Use of an alternative fuel at a steam generating unit to the extent that the fuel is generated from municipal solid waste;

(v) Use of an alternative fuel or raw material by a stationary source which:

(A) The source was capable of accommodating before December 21, 1976, unless such change would be prohibited under any federally enforceable permit condition which was established after December 12, 1976, pursuant to 40 C.F.R. 52.21 or under regulations approved pursuant to 40 C.F.R. Part 51, Subpart I or 40 C.F.R. 51.166; or

(B) The source is approved to use under any permit issued under regulations approved by EPA implementing 40 C.F.R. 51.165.

(vi) An increase in the hours of operation or in the production rate, unless such change is prohibited under any federally enforceable permit condition which was established after December 21, 1976, pursuant to 40 C.F.R. 52.21 or regulations approved pursuant to 40 C.F.R. Part 51, Subpart I or 40 C.F.R. 51.166;

(vii) Any change in ownership at a stationary source;

(viii) The installation, operation, cessation, or removal of a temporary clean coal technology demonstration project, provided that the project complies with:

(A) The state implementation plan for the state in which the project is located; and

(B) Other requirements necessary to attain and maintain the National Ambient Air Quality Standard during the project and after it is terminated.

(d) This definition shall not apply with respect to a particular regulated NSR pollutant when the major stationary source is complying with the requirements for a PAL for that pollutant. Instead, the definitions in 40 C.F.R. Part 51, Appendix S (in effect on the date in WAC 173-400-025) shall apply.

(e) For the purpose of applying the requirements of WAC 173-400-830 (1)(i) to modifications at major stationary sources of nitrogen oxides located in ozone nonattainment areas or in ozone transport regions, whether or not subject to sections 181-185B, Part D, Title I of the Federal Clean Air Act, any significant net emissions increase of nitrogen oxides is considered significant for ozone.

(f) Any physical change in, or change in the method of operation of, a major stationary source of volatile organic compounds that results in any increase in emissions of volatile organic compounds from any discrete operation, emissions unit, or other pollutant emitting activity at the source shall be considered a significant net emissions increase and a major modification for ozone, if the major stationary source is located in an extreme ozone nonattainment area that is sub-



ject to sections 181-185B, Part D, Title I of the Federal Clean Air Act.

(g) Fugitive emissions shall not be included in determining for any of the purposes of this section whether a physical change in or change in the method of operation of a major stationary source is a major modification, unless the source belongs to one of the source categories listed in subsection (14)(e) of this section, the definition of major stationary source.

(16) Necessary preconstruction approvals or permits means those permits or orders of approval required under federal air quality control laws and regulations or under air quality control laws and regulations which are part of the applicable state implementation plan.

(17)(a) Net emissions increase means with respect to any regulated NSR pollutant emitted by a major stationary source, the amount by which the sum of the following exceeds zero:

(i) The increase in emissions from a particular physical change or change in the method of operation at a stationary source as calculated pursuant to WAC 173-400-820 (2) and (3); and

(ii) Any other increases and decreases in actual emissions at the major stationary source that are contemporaneous with the particular change and are otherwise creditable. In determining the net emissions increase, baseline actual emissions for calculating increases and decreases shall be determined as provided in the definition of baseline actual emissions, except that subsection (2)(a)(iii) and (b)(iv) of this section, in the definition of baseline actual emissions, shall not apply.

(b) An increase or decrease in actual emissions is contemporaneous with the increase from the particular change only if it occurs before the date that the increase from the particular change occurs;

(c) An increase or decrease in actual emissions is creditable only if:

(i) It occurred no more than one year prior to the date of submittal of a complete notice of construction application for the particular change, or it has been documented by an emission reduction credit (ERC). Any emissions increases occurring between the date of issuance of the ERC and the date when a particular change becomes operational shall be counted against the ERC; and

(ii) The permitting authority has not relied on it in issuing a permit for the source under regulations approved pursuant to 40 C.F.R. 51.165, which permit is in effect when the increase in actual emissions from the particular change occurs; and

(iii) As it pertains to an increase or decrease in fugitive emissions (to the extent quantifiable), it occurs at an emissions unit that is part of one of the source categories listed in subsection (14)(e) of this section, the definition of major stationary source, or it occurs at an emissions unit that is located at a major stationary source that belongs to one of the listed source categories. Fugitive emission increases or decreases are not creditable for those emissions units located at a facility whose primary activity is not represented by one of the source categories listed in subsection (14)(e) of this section, the definition of major stationary source, and that are not, by themselves, part of a listed source category.

(d) An increase in actual emissions is creditable only to the extent that the new level of actual emissions exceeds the old level;

(e) A decrease in actual emissions is creditable only to the extent that:

(i) The old level of actual emission or the old level of allowable emissions whichever is lower, exceeds the new level of actual emissions;

(ii) It is enforceable as a practical matter at and after the time that actual construction on the particular change begins;

(iii) The permitting authority has not relied on it as part of an offsetting transaction under WAC 173-400-113(4) or 173-400-830 or in issuing any permit under regulations approved pursuant to 40 C.F.R. Part 51, Subpart I or the state has not relied on it in demonstrating attainment or reasonable further progress;

(iv) It has approximately the same qualitative significance for public health and welfare as that attributed to the increase from the particular change; and

(f) An increase that results from a physical change at a source occurs when the emissions unit on which construction occurred becomes operational and begins to emit a particular pollutant.

(g) Any replacement unit that requires shakedown becomes operational only after a reasonable shakedown period, not to exceed one hundred eighty days.

(h) Subsection (1)(b) of this section, in the definition of actual emissions, shall not apply for determining creditable increases and decreases or after a change.

(18) Nonattainment major new source review (NSR) program means the major source preconstruction permit program that has been approved by EPA and incorporated into the plan to implement the requirements of 40 C.F.R. 51.165, or a program that implements 40 C.F.R. Part 51, Appendix S, sections I through VI. Any permit issued under either program is a major NSR permit.

(19) Pollution prevention means any activity that through process changes, product reformulation or redesign, or substitution of less polluting raw materials, eliminates or reduces the release of air pollutants (including fugitive emissions) and other pollutants to the environment prior to recycling, treatment, or disposal; it does not mean recycling (other than certain "in-process recycling" practices), energy recovery, treatment, or disposal.

(20) Predictive emissions monitoring system (PEMS) means all of the equipment necessary to monitor process and control device operational parameters (for example, control device secondary voltages and electric currents) and other information (for example, gas flow rate, O<sub>2</sub> or CO<sub>2</sub> concentrations), and calculate and record the mass emissions rate (for example, lb/hr) on a continuous basis.

(21) Prevention of significant deterioration (PSD) permit means any permit that is issued under the major source preconstruction permit program that has been approved by EPA and incorporated into the plan to implement the requirements of 40 C.F.R. 51.166, or under the program in 40 C.F.R. 52.21.

(22) Project means a physical change in, or change in the method of operation of, an existing major stationary source.

(23)(a) Projected actual emissions means the maximum annual rate, in tons per year, at which an existing emissions unit is projected to emit a regulated NSR pollutant in any one of the five years (twelve-month period) following the date the unit resumes regular operation after the project, or in any one of the ten years following that date, if the project involves increasing the emissions unit's design capacity or its potential to emit of that regulated NSR pollutant and full utilization of the unit would result in a significant emissions in-



crease or a significant net emissions increase at the major stationary source.

(b) In determining the projected actual emissions before beginning actual construction, the owner or operator of the major stationary source:

(i) Shall consider all relevant information including, but not limited to, historical operational data, the company's own representations, the company's expected business activity and the company's highest projections of business activity, the company's filings with the state or federal regulatory authorities, and compliance plans under the approved plan; and

(ii) Shall include emissions associated with startups, shutdowns, and malfunctions; and, for an emissions unit that is part of one of the source categories listed in subsection (14)(e) of this section, the definition of major stationary source, or for an emissions unit that is located at a major stationary source that belongs to one of the listed source categories, shall include fugitive emissions (to the extent quantifiable); and

(iii) Shall exclude, in calculating any increase in emissions that results from the particular project, that portion of the unit's emissions following the project that an existing unit could have accommodated during the consecutive twenty-four-month period used to establish the baseline actual emissions and that are also unrelated to the particular project, including any increased utilization due to product demand growth; or

(iv) In lieu of using the method set out in (b)(i) through (iii) of this subsection, the owner or operator may elect to use the emissions unit's potential to emit, in tons per year. For this purpose, if the emissions unit is part of one of the source categories listed in subsection (14)(e) of this section, the definition of major stationary source or if the emissions unit is located at a major stationary source that belongs to one of the listed source categories, the unit's potential to emit shall include fugitive emissions (to the extent quantifiable).

(24)(a) Regulated NSR pollutant, means the following:

(i) Nitrogen oxides or any volatile organic compounds;

(ii) Any pollutant for which a National Ambient Air Quality Standard has been promulgated;

(iii) Any pollutant that is identified under this subsection as a constituent or precursor of a general pollutant listed in (a)(i) or (ii) of this subsection, provided that such constituent or precursor pollutant may only be regulated under NSR as part of regulation of the general pollutant. For purposes of NSR precursor pollutants are the following:

(A) Volatile organic compounds and nitrogen oxides are precursors to ozone in all ozone nonattainment areas.

(B) Sulfur dioxide is a precursor to PM-2.5 in all PM-2.5 nonattainment areas.

(C) Nitrogen oxides are precursors to PM-2.5 in all PM-2.5 nonattainment areas.

(b) PM-2.5 emissions and PM-10 emissions shall include gaseous emissions from a source or activity which condense to form particulate matter at ambient temperatures. On or after January 1, 2011, such condensable particulate matter shall be accounted for in applicability determinations and in establishing emissions limitations for PM-2.5 in nonattainment major NSR permits. Compliance with emissions limitations for PM-2.5 issued prior to this date shall not be based on condensable

particulate matter unless required by the terms and conditions of the permit or the applicable implementation plan. Applicability determinations for PM-2.5 made prior to the effective date of WAC 173-400-800 through 173-400-850 made without accounting for condensable particulate matter shall not be considered in violation of WAC 173-400-800 through 173-400-850.

(25)(a) Replacement unit means an emissions unit for which all the criteria listed below are met:

(i) The emissions unit is a reconstructed unit within the meaning of 40 C.F.R. 60.15 (b)(1), or the emissions unit completely takes the place of an existing emissions unit.

(ii) The emissions unit is identical to or functionally equivalent to the replaced emissions unit.

(iii) The replacement does not alter the basic design parameters of the process unit. Basic design parameters are:

(A) Except as provided in (a)(iii)(C) of this subsection, for a process unit at a steam electric generating facility, the owner or operator may select as its basic design parameters either maximum hourly heat input and maximum hourly fuel consumption rate or maximum hourly electric output rate and maximum steam flow rate. When establishing fuel consumption specifications in terms of weight or volume, the minimum fuel quality based on British thermal units content must be used for determining the basic design parameter(s) for a coal-fired electric utility steam generating unit.

(B) Except as provided in (a)(iii)(C) of this subsection, the basic design parameter(s) for any process unit that is not at a steam electric generating facility are maximum rate of fuel or heat input, maximum rate of material input, or maximum rate of product output. Combustion process units will typically use maximum rate of fuel input. For sources having multiple end products and raw materials, the owner or operator should consider the primary product or primary raw material of the process unit when selecting a basic design parameter.

(C) If the owner or operator believes the basic design parameter(s) in (a)(iii)(A) and (B) of this subsection is not appropriate for a specific industry or type of process unit, the owner or operator may propose to the reviewing authority an alternative basic design parameter(s) for the source's process unit(s). If the reviewing authority approves of the use of an alternative basic design parameter(s), the reviewing authority will issue a new permit or modify an existing permit that is legally enforceable that records such basic design parameter(s) and requires the owner or operator to comply with such parameter(s).

(D) The owner or operator shall use credible information, such as results of historic maximum capability tests, design information from the manufacturer, or engineering calculations, in establishing the magnitude of the basic design parameter(s) specified in (a)(iii)(A) and (B) of this subsection.

(E) If design information is not available for a process unit, then the owner or operator shall determine the process unit's basic design parameter(s) using the maximum value achieved by the process unit in the five-year period immediately preceding the planned activity.

(F) Efficiency of a process unit is not a basic design parameter.

(iv) The replaced emissions unit is permanently removed from the major stationary source, otherwise permanently disabled, or permanently barred from operation by a permit that is enforceable as a practi-

cal matter. If the replaced emissions unit is brought back into operation, it shall constitute a new emissions unit.

(b) No creditable emission reductions shall be generated from shutting down the existing emissions unit that is replaced.

(26) Reviewing authority means "permitting authority" as defined in WAC 173-400-030.

(27) Significant means:

(a) In reference to a net emissions increase or the potential of a source to emit any of the following pollutants, a rate of emissions that would equal or exceed any of the following rates:

| 3ROOXWDQW       | Emission Rate                                                                                                                                       |
|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|
| Carbon monoxide | 100 tons per year (tpy)                                                                                                                             |
| Nitrogen oxides | 40 tons per year                                                                                                                                    |
| Sulfur dioxide  | 40 tons per year                                                                                                                                    |
| 2]RQH           | 40 tons per year of volatile<br>R[ganic compounds or nitrogen<br>R[LGHV                                                                             |
| /HDG            | 0.6 tons per year                                                                                                                                   |
| PM-10           | 15 tons per year                                                                                                                                    |
| PM-2.5          | 10 tons per year of direct<br>PM-2.5 emissions; 40 tons per<br>year of nitrogen oxide<br>emissions; 40 tons per year of<br>sulfur dioxide emissions |

(b) Notwithstanding the significant emissions rate for ozone, significant means, in reference to an emissions increase or a net emissions increase, any increase in actual emissions of volatile organic compounds that would result from any physical change in, or change in the method of operation of, a major stationary source locating in a serious or severe ozone nonattainment area that is subject to sections 181-185B, of the Federal Clean Air Act, if such emissions increase of volatile organic compounds exceeds twenty-five tons per year.

(c) For the purposes of applying the requirements of WAC 173-400-830 (1)(i) to modifications at major stationary sources of nitrogen oxides located in an ozone nonattainment area or in an ozone transport region, the significant emission rates and other requirements for volatile organic compounds in (a), (b), and (e) of this subsection, of the definition of significant, shall apply to nitrogen oxides emissions.

(d) Notwithstanding the significant emissions rate for carbon monoxide under (a) of this subsection, the definition of significant, significant means, in reference to an emissions increase or a net emissions increase, any increase in actual emissions of carbon monoxide that would result from any physical change in, or change in the method of operation of, a major stationary source in a serious nonattainment area for carbon monoxide if such increase equals or exceeds fifty tons per year, provided EPA has determined that stationary sources contribute significantly to carbon monoxide levels in that area.

(e) Notwithstanding the significant emissions rates for ozone under (a) and (b) of this subsection, the definition of significant, any increase in actual emissions of volatile organic compounds from any emissions unit at a major stationary source of volatile organic compounds located in an extreme ozone nonattainment area that is subject

to sections 181-185B of the Federal Clean Air Act shall be considered a significant net emissions increase.

(28) Significant emissions increase means, for a regulated NSR pollutant, an increase in emissions that is significant for that pollutant.

(29) Source and stationary source means any building, structure, facility, or installation which emits or may emit a regulated NSR pollutant.

(30) Temporary clean coal technology demonstration project means a clean coal technology demonstration project that is operated for a period of five years or less, and which complies with the state implementation plan for the state in which the project is located and other requirements necessary to attain and maintain the National Ambient Air Quality Standards during the project and after it is terminated.

(31) Best available control technology (BACT) means an emissions limitation (including a visible emissions standard) based on the maximum degree of reduction for each regulated NSR pollutant which would be emitted from any proposed major stationary source or major modification which the reviewing authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant. In no event shall application of best available control technology result in emissions of any pollutant which would exceed the emissions allowed by any applicable standard under 40 C.F.R. Part 60 or 61. If the reviewing authority determines that technological or economic limitations on the application of measurement methodology to a particular emissions unit would make the imposition of an emissions standard infeasible, a design, equipment, work practice, operational standard, or combination thereof, may be prescribed instead to satisfy the requirement for the application of BACT. Such standard shall, to the degree possible, set forth the emissions reduction achievable by implementation of such design, equipment, work practice or operation, and shall provide for compliance by means which achieve equivalent results.

[Statutory Authority: For chapter 173-423 WAC is RCW 70.120A.010; and for chapters 173-400 and 173-476 WAC is RCW 70.94.152, 70.94.331, 70.94.860. WSR 16-12-099 (Order 16-01), § 173-400-810, filed 5/31/16, effective 7/1/16. Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-810, filed 11/28/12, effective 12/29/12; WSR 11-06-060 (Order 09-01), § 173-400-810, filed 3/1/11, effective 4/1/11.]

EPA effective: 11/7/16 (81 FR 69385, 10/6/16)

**WAC 173-400-820 Determining if a new stationary source or modification to a stationary source is subject to these requirements.** (1) Any new major stationary source located anywhere in a nonattainment area designated under section 107 (d)(1)(A)(i) of the Federal Clean Air Act, that is major for the pollutant for which the area is designated nonattainment is subject to the permitting requirements of WAC 173-400-830 through 173-400-850. Any major modification of an existing major stationary source that is major for the pollutant for which the area is designated nonattainment and is located anywhere in a nonattainment area designated under section 107 (d)(1)(A)(i) of the Federal Clean Air Act, and that has a significant net emissions increase of

the pollutant for which the area is designated nonattainment is subject to the permitting requirements of WAC 173-400-830 through 173-400-850. A modification to an existing major stationary source must use the following procedures to determine if the modification would result in a significant net emissions increase of the nonattainment pollutant.

(2) Except as otherwise provided in subsection (4) of this section, and consistent with the definition of major modification, a project is a major modification for a regulated NSR pollutant if it causes two types of emissions increases - A significant emissions increase, and a significant net emissions increase. The project is not a major modification if it does not cause a significant emissions increase. If the project causes a significant emissions increase, then the project is a major modification only if it also results in a significant net emissions increase.

(3) The procedure for calculating (before beginning actual construction) whether a significant emissions increase (i.e., the first step of the process) will occur depends upon the type of emissions units being modified, according to (a) through (c) of this subsection. For these calculations, fugitive emissions (to the extent quantifiable) are included only if the emissions unit is part of one of the source categories listed in the definition of major stationary source contained in WAC 173-400-810 (14)(e) or if the emissions unit is located at a major stationary source that belongs to one of the listed source categories. Fugitive emissions are not included for those emissions units located at a facility whose primary activity is not represented by one of the source categories listed in the definition of major stationary source contained in WAC 173-400-810 (14)(e) and that are not, by themselves, part of a listed source category. The procedure for calculating (before beginning actual construction) whether a significant net emissions increase will occur at the major stationary source (i.e., the second step of the process) is contained in the definition of net emission increase. Regardless of any such preconstruction projections, a major modification results if the project causes a significant emissions increase and a significant net emissions increase.

(a) Actual-to-projected-actual applicability test for projects that only involve existing emissions units. A significant emissions increase of a regulated NSR pollutant is projected to occur if the sum of the difference between the projected actual emissions and the baseline actual emissions, for each existing emissions unit, equals or exceeds the significant amount for that pollutant.

(b) Actual-to-potential test for projects that only involve construction of a new emissions unit(s). A significant emissions increase of a regulated NSR pollutant is projected to occur if the sum of the difference between the potential to emit from each new emissions unit following completion of the project and the baseline actual emissions of these units before the project equals or exceeds the significant amount for that pollutant.

(c) Hybrid test for projects that involve multiple types of emissions units. A significant emissions increase of a regulated NSR pollutant is projected to occur if the sum of the emissions increases for each emissions unit, using the method specified in (a) and (b) of this subsection as applicable with respect to each emissions unit, for each type of emissions unit equals or exceeds the significant amount for that pollutant.



(4) Any major stationary source which has a PAL for a regulated NSR pollutant shall comply with requirements in WAC 173-400-850.

(5) The following specific provisions apply with respect to any regulated NSR pollutant emitted from projects at existing emissions units at a major stationary source (other than projects at a source with a PAL) in circumstances where there is a reasonable possibility that a project that is not a part of a major modification may result in a significant emissions increase of such pollutant, and the owner or operator elects to use the method specified in the definition of projected actual emissions contained in WAC 173-400-810 (23)(b)(i) through (iii) for calculating projected actual emissions.

(a) Before beginning actual construction of the project, the owner or operator shall document, and maintain a record of the following information:

(i) A description of the project;

(ii) Identification of the emissions unit(s) whose emissions of a regulated NSR pollutant could be affected by the project; and

(iii) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions, the projected actual emissions, the amount of emissions excluded under the definition of projected actual emissions contained in WAC 173-400-810 (23)(b)(iii) and an explanation for why such amount was excluded, and any netting calculations, if applicable.

(b) Before beginning actual construction, the owner or operator shall provide a copy of the information set out in (a) of this subsection to the permitting authority. This information may be submitted in conjunction with any NOC application required under the provisions of WAC 173-400-110. Nothing in this subsection shall be construed to require the owner or operator of such a unit to obtain any determination from the permitting authority before beginning actual construction.

(c) The owner or operator shall monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any emissions units identified in (a)(ii) of this subsection; and calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five years following resumption of regular operations after the change, or for a period of ten years following resumption of regular operations after the change if the project increases the design capacity or potential to emit of that regulated NSR pollutant at such emissions unit.

(d) The owner or operator shall submit a report to the permitting authority within sixty days after the end of each year during which records must be generated under (c) of this subsection setting out the unit's annual emissions, as monitored pursuant to (c) of this subsection, during the year that preceded submission of the report.

(e) The owner or operator shall submit a report to the permitting authority if the annual emissions, in tons per year, from the project identified in (a) of this subsection, exceed the baseline actual emissions (as documented and maintained pursuant to (a)(iii) of this subsection), by a significant amount (as defined in the definition of significant) for that regulated NSR pollutant, and if such emissions differ from the preconstruction projection as documented and maintained pursuant to (a)(iii) of this subsection. Such report shall be submitted to the permitting authority within sixty days after the end of such year. The report shall contain the following:

(i) The name, address and telephone number of the major stationary source;

(ii) The annual emissions as calculated pursuant to (d) of this subsection; and

(iii) Any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).

(f) A "reasonable possibility" under this subsection occurs when the owner or operator calculates the project to result in either:

(i) A projected actual emissions increase of at least fifty percent of the amount that is a "significant emissions increase," (without reference to the amount that is a significant net emissions increase), for the regulated NSR pollutant; or

(ii) A projected actual emissions increase that, added to the amount of emissions excluded under the definition of projected actual emissions sums to at least fifty percent of the amount that is a "significant emissions increase," (without reference to the amount that is a significant net emissions increase), for the regulated NSR pollutant. For a project for which a reasonable possibility occurs only within the meaning of (f)(ii) of this subsection, and not also within the meaning of (f)(i) of this subsection, then (c) through (f) of this subsection does not apply to the project.

(6) For projects not required to submit the above information to the permitting authority as part of a notice of construction application, the owner or operator of the source shall make the information required to be documented and maintained pursuant to subsection (5) of this section available for review upon a request for inspection by the permitting authority or the general public pursuant to the requirements contained in chapter 173-401 WAC.

[Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-820, filed 11/28/12, effective 12/29/12; WSR 11-06-060 (Order 09-01), § 173-400-820, filed 3/1/11, effective 4/1/11.]

**EPA effective: 12/8/14 (79 FR 66291, 11/7/14)**

**WAC 173-400-830 Permitting requirements.** (1) The owner or operator of a proposed new major stationary source or a major modification of an existing major stationary source, as determined according to WAC 173-400-820, is authorized to construct and operate the proposed project provided the following requirements are met:

(a) The proposed new major stationary source or a major modification of an existing major stationary source will not cause any ambient air quality standard to be exceeded, will not violate the requirements for reasonable further progress established by the SIP and will comply with WAC 173-400-113 (3) and (4) for all air contaminants for which the area has not been designated nonattainment.

(b) The permitting authority has determined, based on review of an analysis performed by the owner or operator of a proposed new major stationary source or a major modification of an existing major stationary source of alternative sites, sizes, production processes, and environmental control techniques, that the benefits of the project significantly outweigh the environmental and social costs imposed as a result of its location, construction, or modification.

(c) The proposed new major stationary source or a major modification of an existing major stationary source will comply with all applicable New Source Performance Standards, National Emission Standards for Hazardous Air Pollutants, National Emission Standards for Hazard-



ous Air Pollutants for Source Categories, and emission standards adopted by ecology and the permitting authority.

(d) The proposed new major stationary source or a major modification of an existing major stationary source will employ BACT for all air contaminants and designated precursors to those air contaminants, except that it will achieve LAER for the air contaminants and designated precursors to those air contaminants for which the area has been designated nonattainment and for which the proposed new major stationary source is major or for which the existing source is major and the proposed modification is a major modification.

(e) Allowable emissions from the proposed new major stationary source or major modification of an existing major stationary source of that air contaminant and designated precursors to those air contaminants are offset by reductions in actual emissions from existing sources in the nonattainment area. All offsetting emission reductions must satisfy the requirements in WAC 173-400-840.

(f) The owner or operator of the proposed new major stationary source or major modification of an existing major stationary source has demonstrated that all major stationary sources owned or operated by such person (or by any entity controlling, controlled by, or under common control with such person) in Washington are subject to emission limitations and are in compliance, or on a schedule for compliance, with all applicable emission limitations and standards under the Federal Clean Air Act, including all rules in the SIP.

(g) If the proposed new source is also a major stationary source within the meaning of WAC 173-400-720, or the proposed modification is also a major modification within the meaning of WAC 173-400-720, it meets the requirements of the PSD program under 40 C.F.R. 52.21 delegated to ecology by EPA Region 10, while such delegated program remains in effect. The proposed new major stationary source or major modification will comply with the PSD program in WAC 173-400-700 through 173-400-750 for all air contaminants for which the area has not been designated nonattainment when that PSD program has been approved into the Washington SIP.

(h) The proposed new major stationary source or the proposed major modification meets the special protection requirements for federal Class I areas in WAC 173-400-117.

(i) All requirements of this section applicable to major stationary sources and major modifications of volatile organic compounds shall apply to nitrogen oxides emissions from major stationary sources and major modifications of nitrogen oxides in an ozone transport region or in any ozone nonattainment area, except in an ozone nonattainment area or in portions of an ozone transport region where EPA has granted a NO<sub>x</sub> waiver applying the standards set forth under section 182(f) of the Federal Clean Air Act and the waiver continues to apply.

(j) The requirements of this section applicable to major stationary sources and major modifications of PM-10 and PM-2.5 shall also apply to major stationary sources and major modifications of PM-10 and PM-2.5 precursors, except where EPA determines that such sources do not contribute significantly to PM-10 levels that exceed the PM-10 ambient standards in the area.

(2) Approval to construct shall not relieve any owner or operator of the responsibility to comply fully with applicable provisions of the state implementation plan and any other requirements under local, state or federal law.

(3) At such time that a particular source or modification becomes a major stationary source or major modification solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of regulations approved pursuant to 40 C.F.R. 51.165, or the requirements of 40 C.F.R. Part 51, Appendix S, as applicable, shall apply to the source or modification as though construction had not yet commenced on the source or modification. 40 C.F.R. Part 51, Appendix S shall not apply to a new or modified source for which enforceable limitations are established after WAC 173-400-800 through 173-400-850 have been approved into Washington's SIP.

[Statutory Authority: RCW 70.94.152, 70.94.331, 70.94.860. WSR 16-12-099 (Order 16-01), § 173-400-830, filed 5/31/16, effective 7/1/16. Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-830, filed 11/28/12, effective 12/29/12; WSR 11-06-060 (Order 09-01), § 173-400-830, filed 3/1/11, effective 4/1/11.]

EPA effective: 11/7/16 (81 FR 69385, 10/6/16)

**WAC 173-400-840 Emission offset requirements.** (1) The ratio of total actual emissions reductions to the emissions increase shall be 1.1:1 unless an alternative ratio is provided for the applicable non-attainment area in subsection (2) through (4) of this section.

(2) In meeting the emissions offset requirements of WAC 173-400-830 for ozone nonattainment areas that are subject to sections 181-185B of the Federal Clean Air Act, the ratio of total actual emissions reductions of VOC to the emissions increase of VOC shall be as follows:

- (a) In any marginal nonattainment area for ozone - 1.1:1;
- (b) In any moderate nonattainment area for ozone - 1.15:1;
- (c) In any serious nonattainment area for ozone - 1.2:1;
- (d) In any severe nonattainment area for ozone - 1.3:1; and
- (e) In any extreme nonattainment area for ozone - 1.5:1.

(3) Notwithstanding the requirements of subsection (2) of this section for meeting the requirements of WAC 173-400-830, the ratio of total actual emissions reductions of VOC to the emissions increase of VOC shall be 1.15:1 for all areas within an ozone transport region that is subject to sections 181-185B of the Federal Clean Air Act, except for serious, severe, and extreme ozone nonattainment areas that are subject to sections 181-185B of the Federal Clean Air Act.

(4) In meeting the emissions offset requirements of this section for ozone nonattainment areas that are subject to sections 171-179b of the Federal Clean Air Act (but are not subject to sections 181-185B of the Federal Clean Air Act, including eight-hour ozone nonattainment areas subject to 40 C.F.R. 51.902(b)), the ratio of total actual emissions reductions of VOC to the emissions increase of VOC shall be 1.1:1.

(5) Emission offsets used to meet the requirements of WAC 173-400-830 (1)(e), must be for the same regulated NSR pollutant.

(6) If the offsets are provided by another source, the reductions in emissions from that source must be federally enforceable by the time the order of approval for the new or modified source is effective. An emission reduction credit issued under WAC 173-400-131 may be

used to satisfy some or all of the offset requirements of this subsection.

(7) Emission offsets are required for the incremental increase in allowable emissions occurring during startup and shutdown operations at the new or modified emission units subject to nonattainment area major new source review. The incremental increase is the difference between the allowable emissions during normal operation and the allowable emissions for startup and shutdown contained in the nonattainment new source review approval.

(8) Emission offsets including those described in an emission reduction credit issued under WAC 173-400-131, must meet the following criteria:

(a) The baseline for determining credit for emissions reductions is the emissions limit under the applicable state implementation plan in effect at the time the notice of construction application is determined to be complete, except that the offset baseline shall be the actual emissions of the source from which offset credit is obtained where:

(i) The demonstration of reasonable further progress and attainment of ambient air quality standards is based upon the actual emissions of sources located within the designated nonattainment area; or

(ii) The applicable state implementation plan does not contain an emissions limitation for that source or source category.

(b) Other limitations on emission offsets.

(i) Where the emissions limit under the applicable state implementation plan allows greater emissions than the potential to emit of the source, emissions offset credit will be allowed only for control below the potential to emit;

(ii) For an existing fuel combustion source, credit shall be based on the allowable emissions under the applicable state implementation plan for the type of fuel being burned at the time the notice of construction application is determined to be complete. If the existing source commits to switch to a cleaner fuel at some future date, an emissions offset credit based on the allowable (or actual) emissions reduction resulting from the fuels change is not acceptable, unless the permit or other enforceable order is conditioned to require the use of a specified alternative control measure which would achieve the same degree of emissions reduction should the source switch back to the higher emitting (dirtier) fuel at some later date. The permitting authority must ensure that adequate long-term supplies of the new fuel are available before granting emissions offset credit for fuel switches;

(iii) Emission reductions.

(A) Emissions reductions achieved by shutting down an existing emission unit or curtailing production or operating hours may be generally credited for offsets if:

(I) Such reductions are surplus, permanent, quantifiable, and federally enforceable; and

(II) The shutdown or curtailment occurred after the last day of the base year for the SIP planning process. For purposes of this subsection, the permitting authority may choose to consider a prior shutdown or curtailment to have occurred after the last day of the base year if the projected emissions inventory used to develop the attainment demonstration explicitly includes the preshutdown or precurtailment emissions from the previously shutdown or curtailed emission units. However, in no event may credit be given for shutdowns that occurred before August 7, 1977.

(B) Emissions reductions achieved by shutting down an existing emissions unit or curtailing production or operating hours and that do not meet the requirements in subsection (8)(b)(iii)(A) of this section may be generally credited only if:

(I) The shutdown or curtailment occurred on or after the date the construction permit application is filed; or

(II) The applicant can establish that the proposed new emissions unit is a replacement for the shutdown or curtailed emissions unit, and the emissions reductions achieved by the shutdown or curtailment met the requirements of (7)(b)(iii)(A)(I) of this section.

(iv) All emission reductions claimed as offset credit shall be federally enforceable;

(v) Emission reductions used for offsets may only be from any location within the designated nonattainment area. Except the permitting authority may allow use of emission reductions from another area that is nonattainment for the same pollutant, provided the following conditions are met:

(A) The other area is designated as an equal or higher nonattainment status than the nonattainment area where the source proposing to use the reduction is located; and

(B) Emissions from the other nonattainment area contribute to violations of the standard in the nonattainment area where the source proposing to use the reduction is located.

(vi) Credit for an emissions reduction can be claimed to the extent that the reduction has not been relied on in issuing any permit under 40 C.F.R. 52.21 or regulations approved pursuant to 40 C.F.R. Part 51, subpart I or the state has not relied on it in demonstration of attainment or reasonable further progress.

(vii) The total tonnage of increased emissions, in tons per year, resulting from a major modification that must be offset in accordance with Section 173 of the Federal Clean Air Act shall be determined by summing the difference between the allowable emissions after the modification and the actual emissions before the modification for each emissions unit.

(9) No emissions credit may be allowed for replacing one hydrocarbon compound with another of lesser reactivity, except for those compounds listed in Table 1 of EPA's "Recommended Policy on Control of Volatile Organic Compounds" (42 FR 35314, July 8, 1977). This document is also available from Office of Air Quality Planning and Standards, (MD-15) Research Triangle Park, NC 27711.

[Statutory Authority: RCW 70.94.152, 70.94.331, 70.94.860. WSR 16-12-099 (Order 16-01), § 173-400-840, filed 5/31/16, effective 7/1/16. Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-840, filed 11/28/12, effective 12/29/12; WSR 11-06-060 (Order 09-01), § 173-400-840, filed 3/1/11, effective 4/1/11.]

EPA effective: 11/7/16 (81 FR 69385, 10/6/16)

**WAC 173-400-850 Actual emissions plantwide applicability limitation (PAL).** The Actuals Plantwide Applicability Limitations (PAL) program in Section IV.K of Appendix S (Emission Offset Interpretive Ruling) to 40 C.F.R. Part 51, (in effect on the date in WAC 173-400-025) is adopted with the following exceptions:

(1) The term "reviewing authority" means "permitting authority" as defined in WAC 173-400-030.

(2) "PAL permit" means the major or minor new source review permit issued that establishes the PAL and those PAL terms as they are incorporated into an air operating permit issued pursuant to chapter 173-401 WAC.

(3) The reference to 40 C.F.R. 70.6 (a)(3)(iii)(B) in subsection IV.K.14 means WAC 173-401-615 (3)(b).

(4) No PAL permit can be issued under this provision until EPA adopts this section into the state implementation plan.

[Statutory Authority: RCW 70.94.152, 70.94.331, 70.94.860. WSR 16-12-099 (Order 16-01), § 173-400-850, filed 5/31/16, effective 7/1/16. Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-850, filed 11/28/12, effective 12/29/12; WSR 11-06-060 (Order 09-01), § 173-400-850, filed 3/1/11, effective 4/1/11.]

EPA effective: 11/7/16 (81 FR 69385, 10/6/16)

**WAC 173-400-860 Public involvement procedures.** The public involvement procedures in WAC 173-400-171 shall be followed, including joint public notifications (integrated review) with any proposed notice of construction approval for the project. Any permit issued pursuant to WAC 173-400-830 or 173-400-850 must comply with WAC 173-400-171.

[Statutory Authority: Chapter 70.94 RCW. WSR 11-06-060 (Order 09-01), § 173-400-860, filed 3/1/11, effective 4/1/11.]

EPA effective: 12/8/14 (79 FR 66291, 11/7/14)

~~**WAC 173-400-930 Emergency engines. (1) Applicability.**~~

~~(a) This section applies statewide except where a permitting authority has not adopted this section in rule.~~

~~(b) This section applies to diesel-fueled compression ignition emergency engines with a cumulative BHP rating greater than 500 BHP and equal to or less than 2000 BHP.~~

~~(c) This section is not applicable to emergency engines proposed to be installed as part of a new major stationary source, as defined in WAC 173-400-710 and 173-400-810, or major modification, as defined in WAC 173-400-710 and 173-400-810.~~

~~(d) In lieu of filing a notice of construction application under WAC 173-400-110, the owner or operator may comply with the requirements of this section for emergency engines.~~

~~(e) Compliance with this section satisfies the requirement for new source review of emergency engines under RCW 70.94.152 and chapter 173-460 WAC.~~

~~(f) An applicant may choose to submit a notice of construction application in accordance with WAC 173-400-110 for a site specific review of criteria and toxic air pollutants in lieu of using this section's provisions.~~

~~(g) If an applicant cannot meet the requirements of this section, then they must file a notice of construction application.~~

~~(2) Operating requirements for emergency engines. Emergency engines using this section must:~~

~~(a) Meet EPA emission standards applicable to all new nonroad compression-ignition engines in 40 C.F.R. 89.112 Table 1 and 40 C.F.R. 1039.102 Tables 6 and 7 (in effect on the date in WAC 173-400-025), as applicable for the year that the emergency engine is put in operation.~~

~~(b) Be fueled by ultra low sulfur diesel or ultra low sulfur bio-diesel, with a sulfur content of 15 ppm or 0.0015% sulfur by weight or less.~~

~~(c) Operate a maximum of fifty hours per year for maintenance and testing or other nonemergency use.~~

~~(3) Definitions.~~

~~(a) **Emergency engine** means a new diesel-fueled stationary compression ignition engine. The engine must meet all the criteria specified below. The engine must be:~~

~~(i) Installed for the primary purpose of providing electrical power or mechanical work during an emergency use and is not the source of primary power at the facility; and~~

~~(ii) Operated to provide electrical power or mechanical work during an emergency use.~~

~~(b) **Emergency use** means providing electrical power or mechanical work during any of the following events or conditions:~~

~~(i) The failure or loss of all or part of normal power service to the facility beyond the control of the facility; or~~

~~(ii) The failure or loss of all or part of a facility's internal power distribution system.~~

~~Examples of emergency operation include the pumping of water or sewage and the powering of lights.~~

~~(c) **Maintenance and testing** means operating an emergency engine to:~~

~~(i) Evaluate the ability of the engine or its supported equipment to perform during an emergency; or~~

~~(ii) Train personnel on emergency activities; or~~

~~(iii) Test an engine that has experienced a breakdown, or failure, or undergone a preventative overhaul during maintenance; or~~

~~(iv) Exercise the engine if such operation is recommended by the engine or generator manufacturer.~~

~~[Statutory Authority: RCW 70.94.152, 70.94.331, 70.94.860. WSR 16-12-099 (Order 16-01), § 173-400-930, filed 5/31/16, effective 7/1/16. Statutory Authority: Chapter 70.94 RCW. WSR 12-24-027 (Order 11-10), § 173-400-930, filed 11/28/12, effective 12/29/12; WSR 11-06-060 (Order 09-01), § 173-400-930, filed 3/1/11, effective 4/1/11.]~~

# Appendix F

## **Model Inputs and Outputs**





## **F-1 Model Inputs and Outputs**

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
06/30/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*  
\*\*\* 17:15:55

PAGE 1

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* MODEL SETUP OPTIONS SUMMARY

\*\*\*

\*\* Model Options Selected:

- \* Model Allows User-Specified Options
- \* Model Is Setup For Calculation of Average CONCentration Values.
- \* NO GAS DEPOSITION Data Provided.
- \* NO PARTICLE DEPOSITION Data Provided.
- \* Model Uses NO DRY DEPLETION. DDPLETE = F
- \* Model Uses NO WET DEPLETION. WETDPLT = F
- \* Stack-tip Downwash.
- \* Model Accounts for ELEVated Terrain Effects.
- \* Use Calms Processing Routine.
- \* Use Missing Data Processing Routine.
- \* No Exponential Decay.
- \* Model Uses RURAL Dispersion Only.
- \* ADJ\_U\* - Use ADJ\_U\* option for SBL in AERMET
- \* CCVR\_Sub - Meteorological data includes CCVR substitutions
- \* TEMP\_Sub - Meteorological data includes TEMP substitutions
- \* Model Assumes No FLAGPOLE Receptor Heights.
- \* The User Specified a Pollutant Type of: CO

\*\*Model Calculates 1 Short Term Average(s) of: 1-HR

\*\*This Run Includes: 3 Source(s); 4 Source Group(s); and 11358  
Receptor(s)

with: 3 POINT(s), including  
0 POINTCAP(s) and 0 POINTHOR(s)  
and: 0 VOLUME source(s)  
and: 0 AREA type source(s)  
and: 0 LINE source(s)  
and: 0 RLINE/RLINEXT source(s)  
and: 0 OPENPIT source(s)  
and: 0 BUOYANT LINE source(s) with a total of 0 line(s)  
and: 0 SWPOINT source(s)

\*\*Model Set To Continue RUNning After the Setup Testing.

```
**Output Options Selected:
```

Model Outputs Tables of Highest Short Term Values by Receptor (RECTABLE  
Keyword)

Model Outputs External File(s) of High Values for Plotting (PLOTFILE Keyword)

Model Outputs Separate Summary File of High Ranked Values (SUMMFILE  
Keyword)

**\*\*NOTE:** The Following Flags May Appear Following CONC Values: c for Calm Hours  
m for Missing Hours  
b for Both Calm and

## Missing Hours

```

**Misc. Inputs:  Base Elev. for Pot. Temp. Profile (m MSL) =      5.50 ;  Decay
Coef. =      0.000      ;  Rot. Angle =      0.0
                  Emission Units = GRAMS/SEC                      ;
Emission Rate Unit Factor =  0.10000E+07
                  Output Units  = MICROGRAMS/M**3

```

**\*\*Approximate Storage Requirements of Model = 6.3 MB of RAM.**

```
**Input Runstream File:      aermod.inp
```

```
**Output Print File:      aermod.out
```

\*\*Detailed Error/Message File: HOQUIAMPROJECT\_CO\_1HR.ERR

```
**File for Summary of Results:  HOQUIAMPROJECT_CO_1HR.SUM
```

```

^ *** AERMOD - VERSION 22112 ***
C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT_PM2P5-ANNUAL\HOQUIAMPROJECT_P ***
06/30/23

```

```
*** AERMET - VERSION 22112 *** ***
***                               17:15:55
```

PAGE 2

\*\*\* MODELOPTs:        CONC    ELEV    RURAL    ADJ\_U\*

\*\*\* METEOROLOGICAL DAYS SELECTED FOR

PROCESSING \*\*\*

(1=YES; 0=NO)

[illegible]



| ALBEDO | REF | WS   | WD  | HT   | REF   | TA    | HT     |        |       |      |        |      |      |
|--------|-----|------|-----|------|-------|-------|--------|--------|-------|------|--------|------|------|
| 18     | 01  | 01   | 1   | 01   | -33.0 | 0.317 | -9.000 | -9.000 | -999. | 429. | 110.6  | 0.01 | 0.28 |
| 1.00   |     | 5.51 | 67. | 10.0 | 275.9 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 02   | -42.0 | 0.403 | -9.000 | -9.000 | -999. | 614. | 178.7  | 0.07 | 0.28 |
| 1.00   |     | 5.10 | 51. | 10.0 | 275.3 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 03   | -42.5 | 0.408 | -9.000 | -9.000 | -999. | 625. | 183.1  | 0.07 | 0.28 |
| 1.00   |     | 5.16 | 54. | 10.0 | 275.3 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 04   | -35.4 | 0.339 | -9.000 | -9.000 | -999. | 477. | 126.4  | 0.07 | 0.28 |
| 1.00   |     | 4.32 | 50. | 10.0 | 275.3 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 05   | -35.2 | 0.337 | -9.000 | -9.000 | -999. | 469. | 124.6  | 0.07 | 0.28 |
| 1.00   |     | 4.29 | 58. | 10.0 | 274.8 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 06   | -36.6 | 0.350 | -9.000 | -9.000 | -999. | 498. | 135.1  | 0.07 | 0.28 |
| 1.00   |     | 4.46 | 50. | 10.0 | 274.8 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 07   | -32.7 | 0.340 | -9.000 | -9.000 | -999. | 475. | 126.8  | 0.07 | 0.28 |
| 0.58   |     | 4.32 | 51. | 10.0 | 274.8 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 08   | -0.5  | 0.283 | -9.000 | -9.000 | -999. | 363. | 4158.0 | 0.01 | 0.28 |
| 0.35   |     | 4.71 | 62. | 10.0 | 276.4 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 09   | 14.1  | 0.378 | 0.287  | 0.007  | 61.   | 558. | -351.0 | 0.01 | 0.28 |
| 0.26   |     | 6.19 | 68. | 10.0 | 277.5 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 10   | 23.1  | 0.354 | 0.427  | 0.008  | 123.  | 506. | -175.6 | 0.01 | 0.28 |
| 0.22   |     | 5.72 | 63. | 10.0 | 278.8 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 11   | 25.3  | 0.448 | 0.480  | 0.010  | 160.  | 720. | -325.6 | 0.01 | 0.28 |
| 0.21   |     | 7.33 | 72. | 10.0 | 279.2 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 12   | 20.7  | 0.394 | 0.464  | 0.008  | 176.  | 597. | -270.7 | 0.01 | 0.28 |
| 0.23   |     | 6.43 | 65. | 10.0 | 280.3 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 13   | 9.6   | 0.397 | 0.365  | 0.008  | 184.  | 599. | -591.9 | 0.01 | 0.28 |
| 0.28   |     | 6.53 | 73. | 10.0 | 280.3 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 14   | -19.9 | 0.452 | -9.000 | -9.000 | -999. | 729. | 426.1  | 0.07 | 0.28 |
| 0.41   |     | 5.60 | 59. | 10.0 | 278.8 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 15   | -33.5 | 0.324 | -9.000 | -9.000 | -999. | 454. | 115.3  | 0.01 | 0.28 |
| 1.00   |     | 5.62 | 72. | 10.0 | 278.1 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 16   | -32.9 | 0.317 | -9.000 | -9.000 | -999. | 429. | 110.7  | 0.01 | 0.28 |
| 1.00   |     | 5.51 | 71. | 10.0 | 277.5 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 17   | -25.5 | 0.246 | -9.000 | -9.000 | -999. | 295. | 66.7   | 0.01 | 0.28 |
| 1.00   |     | 4.32 | 62. | 10.0 | 277.0 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 18   | -30.6 | 0.295 | -9.000 | -9.000 | -999. | 385. | 95.7   | 0.01 | 0.28 |
| 1.00   |     | 5.14 | 62. | 10.0 | 277.5 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 19   | -35.3 | 0.340 | -9.000 | -9.000 | -999. | 476. | 127.2  | 0.01 | 0.28 |
| 1.00   |     | 5.89 | 66. | 10.0 | 276.4 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 20   | -39.1 | 0.376 | -9.000 | -9.000 | -999. | 552. | 155.2  | 0.01 | 0.28 |
| 1.00   |     | 6.48 | 67. | 10.0 | 276.4 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 21   | -31.0 | 0.298 | -9.000 | -9.000 | -999. | 394. | 97.7   | 0.01 | 0.28 |
| 1.00   |     | 5.19 | 65. | 10.0 | 276.4 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 22   | -29.6 | 0.285 | -9.000 | -9.000 | -999. | 365. | 89.2   | 0.01 | 0.28 |
| 1.00   |     | 4.97 | 62. | 10.0 | 276.4 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 23   | -31.5 | 0.303 | -9.000 | -9.000 | -999. | 400. | 100.8  | 0.01 | 0.28 |
| 1.00   |     | 5.27 | 61. | 10.0 | 276.4 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 24   | -31.5 | 0.304 | -9.000 | -9.000 | -999. | 402. | 101.6  | 0.01 | 0.28 |

1.00 5.29 63. 10.0 277.0 2.0

First hour of profile data

| YR | MO | DY | HR | HEIGHT | F | WDIR | WSPD | AMB_TMP | sigmaA | sigmaW | sigmaV |
|----|----|----|----|--------|---|------|------|---------|--------|--------|--------|
| 18 | 01 | 01 | 01 | 10.0   | 1 | 67.  | 5.51 | 276.0   | 99.0   | -99.00 | -99.00 |

F indicates top of profile (=1) or below (=0)

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
06/30/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*  
\*\*\* 17:15:55

PAGE 4

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF HIGHEST 1-HR

RESULTS \*\*\*

\*\* CONC OF CO IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID                      | DATE       | NETWORK                      | RECEPTOR  |
|-------------------------------|------------|------------------------------|-----------|
| (XR, YR, ZELEV, ZHILL, ZFLAG) | (YYMMDDHH) | AVERAGE CONC OF TYPE GRID-ID |           |
| - - - - -                     | - - - - -  | - - - - -                    | - - - - - |
| - - - - -                     | - - - - -  | - - - - -                    | - - - - - |

EG HIGH 1ST HIGH VALUE IS 207.37941 ON 20100203: AT ( 430213.66,  
5202866.50, 5.56, 5.56, 0.00) DC

EP04 HIGH 1ST HIGH VALUE IS 457.29325 ON 21062719: AT ( 430164.06,  
5203787.50, 68.49, 92.43, 0.00) DC

EP08 HIGH 1ST HIGH VALUE IS 0.68735 ON 19082924: AT ( 430748.25,  
5203500.50, 4.25, 92.43, 0.00) DC

ALL HIGH 1ST HIGH VALUE IS 457.56545 ON 21062719: AT ( 430164.06,  
5203787.50, 68.49, 92.43, 0.00) DC

\*\*\* RECEPTOR TYPES: GC = GRIDCART  
GP = GRIDPOLR  
DC = DISCCART  
DP = DISCPOLR

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*



06/30/23

\*\*\* AERMET - VERSION 22112 \*\*\*  
\*\*\* 17:15:55

PAGE 5  
\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* Message Summary : AERMOD Model Execution \*\*\*

----- Summary of Total Messages -----

A Total of 0 Fatal Error Message(s)  
A Total of 2 Warning Message(s)  
A Total of 758 Informational Message(s)  
  
A Total of 43824 Hours Were Processed  
  
A Total of 398 Calm Hours Identified  
  
A Total of 360 Missing Hours Identified ( 0.82 Percent)

\*\*\*\*\* FATAL ERROR MESSAGES \*\*\*\*\*  
\*\*\* NONE \*\*\*

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*  
SO W320 44 PPARM: Input Parameter May Be Out-of-Range for Parameter  
VS  
ME W187 11559 MEOPEN: ADJ\_U\* Option for Stable Low Winds used in AERMET

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
06/30/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*  
\*\*\* 17:22:57

PAGE 1

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* MODEL SETUP OPTIONS SUMMARY

\*\*\*

- - - - -  
- - - - -

\*\* Model Options Selected:

- \* Model Allows User-Specified Options
- \* Model Is Setup For Calculation of Average CONCentration Values.
- \* NO GAS DEPOSITION Data Provided.
- \* NO PARTICLE DEPOSITION Data Provided.
- \* Model Uses NO DRY DEPLETION. DDPLETE = F
- \* Model Uses NO WET DEPLETION. WETDPLT = F
- \* Stack-tip Downwash.
- \* Model Accounts for ELEVated Terrain Effects.
- \* Use Calms Processing Routine.
- \* Use Missing Data Processing Routine.
- \* No Exponential Decay.
- \* Model Uses RURAL Dispersion Only.
- \* ADJ\_U\* - Use ADJ\_U\* option for SBL in AERMET
- \* CCVR\_Sub - Meteorological data includes CCVR substitutions
- \* TEMP\_Sub - Meteorological data includes TEMP substitutions
- \* Model Assumes No FLAGPOLE Receptor Heights.
- \* The User Specified a Pollutant Type of: CO

\*\*Model Calculates 1 Short Term Average(s) of: 8-HR

\*\*This Run Includes: 3 Source(s); 4 Source Group(s); and 11358  
Receptor(s)

with: 3 POINT(s), including  
0 POINTCAP(s) and 0 POINTHOR(s)  
and: 0 VOLUME source(s)  
and: 0 AREA type source(s)  
and: 0 LINE source(s)  
and: 0 RLINE/RLINEXT source(s)  
and: 0 OPENPIT source(s)  
and: 0 BUOYANT LINE source(s) with a total of 0 line(s)  
and: 0 SWPOINT source(s)

\*\*Model Set To Continue RUNning After the Setup Testing.

```
**Output Options Selected:
```

Model Outputs Tables of Highest Short Term Values by Receptor (RECTABLE  
Keyword)

Model Outputs External File(s) of High Values for Plotting (PLOTFILE Keyword)

Model Outputs Separate Summary File of High Ranked Values (SUMMFILE  
Keyword)

**\*\*NOTE:** The Following Flags May Appear Following CONC Values: c for Calm Hours  
m for Missing Hours  
b for Both Calm and

## Missing Hours

```

**Misc. Inputs:  Base Elev. for Pot. Temp. Profile (m MSL) =      5.50 ;  Decay
Coef. =      0.000      ;  Rot. Angle =      0.0
                  Emission Units = GRAMS/SEC                      ;
Emission Rate Unit Factor =  0.10000E+07
                  Output Units  = MICROGRAMS/M**3

```

**\*\*Approximate Storage Requirements of Model = 6.3 MB of RAM.**

```
**Input Runstream File:      aermod.inp
```

```
**Output Print File:      aermod.out
```

**\*\*Detailed Error/Message File:   HOQUIAMPROJECT\_CO\_8HR.ERR**

```
**File for Summary of Results:  HOQUIAMPROJECT_CO_8HR.SUM
```

```

^ *** AERMOD - VERSION 22112 ***
C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT_PM2P5-ANNUAL\HOQUIAMPROJECT_P
06/30/23

```

```
*** AERMET - VERSION 22112 ***  
*** 17:22:57
```

PAGE 2

\*\*\* MODELOPTs:        CONC    ELEV    RURAL    ADJ\_U\*

\*\*\* METEOROLOGICAL DAYS SELECTED FOR

PROCESSING \*\*\*

(1=YES; 0=NO)

[illegible]



| ALBEDO | REF | WS   | WD  | HT   | REF   | TA    | HT     |        |       |      |        |      |      |
|--------|-----|------|-----|------|-------|-------|--------|--------|-------|------|--------|------|------|
| 18     | 01  | 01   | 1   | 01   | -33.0 | 0.317 | -9.000 | -9.000 | -999. | 429. | 110.6  | 0.01 | 0.28 |
| 1.00   |     | 5.51 | 67. | 10.0 | 275.9 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 02   | -42.0 | 0.403 | -9.000 | -9.000 | -999. | 614. | 178.7  | 0.07 | 0.28 |
| 1.00   |     | 5.10 | 51. | 10.0 | 275.3 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 03   | -42.5 | 0.408 | -9.000 | -9.000 | -999. | 625. | 183.1  | 0.07 | 0.28 |
| 1.00   |     | 5.16 | 54. | 10.0 | 275.3 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 04   | -35.4 | 0.339 | -9.000 | -9.000 | -999. | 477. | 126.4  | 0.07 | 0.28 |
| 1.00   |     | 4.32 | 50. | 10.0 | 275.3 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 05   | -35.2 | 0.337 | -9.000 | -9.000 | -999. | 469. | 124.6  | 0.07 | 0.28 |
| 1.00   |     | 4.29 | 58. | 10.0 | 274.8 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 06   | -36.6 | 0.350 | -9.000 | -9.000 | -999. | 498. | 135.1  | 0.07 | 0.28 |
| 1.00   |     | 4.46 | 50. | 10.0 | 274.8 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 07   | -32.7 | 0.340 | -9.000 | -9.000 | -999. | 475. | 126.8  | 0.07 | 0.28 |
| 0.58   |     | 4.32 | 51. | 10.0 | 274.8 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 08   | -0.5  | 0.283 | -9.000 | -9.000 | -999. | 363. | 4158.0 | 0.01 | 0.28 |
| 0.35   |     | 4.71 | 62. | 10.0 | 276.4 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 09   | 14.1  | 0.378 | 0.287  | 0.007  | 61.   | 558. | -351.0 | 0.01 | 0.28 |
| 0.26   |     | 6.19 | 68. | 10.0 | 277.5 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 10   | 23.1  | 0.354 | 0.427  | 0.008  | 123.  | 506. | -175.6 | 0.01 | 0.28 |
| 0.22   |     | 5.72 | 63. | 10.0 | 278.8 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 11   | 25.3  | 0.448 | 0.480  | 0.010  | 160.  | 720. | -325.6 | 0.01 | 0.28 |
| 0.21   |     | 7.33 | 72. | 10.0 | 279.2 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 12   | 20.7  | 0.394 | 0.464  | 0.008  | 176.  | 597. | -270.7 | 0.01 | 0.28 |
| 0.23   |     | 6.43 | 65. | 10.0 | 280.3 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 13   | 9.6   | 0.397 | 0.365  | 0.008  | 184.  | 599. | -591.9 | 0.01 | 0.28 |
| 0.28   |     | 6.53 | 73. | 10.0 | 280.3 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 14   | -19.9 | 0.452 | -9.000 | -9.000 | -999. | 729. | 426.1  | 0.07 | 0.28 |
| 0.41   |     | 5.60 | 59. | 10.0 | 278.8 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 15   | -33.5 | 0.324 | -9.000 | -9.000 | -999. | 454. | 115.3  | 0.01 | 0.28 |
| 1.00   |     | 5.62 | 72. | 10.0 | 278.1 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 16   | -32.9 | 0.317 | -9.000 | -9.000 | -999. | 429. | 110.7  | 0.01 | 0.28 |
| 1.00   |     | 5.51 | 71. | 10.0 | 277.5 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 17   | -25.5 | 0.246 | -9.000 | -9.000 | -999. | 295. | 66.7   | 0.01 | 0.28 |
| 1.00   |     | 4.32 | 62. | 10.0 | 277.0 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 18   | -30.6 | 0.295 | -9.000 | -9.000 | -999. | 385. | 95.7   | 0.01 | 0.28 |
| 1.00   |     | 5.14 | 62. | 10.0 | 277.5 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 19   | -35.3 | 0.340 | -9.000 | -9.000 | -999. | 476. | 127.2  | 0.01 | 0.28 |
| 1.00   |     | 5.89 | 66. | 10.0 | 276.4 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 20   | -39.1 | 0.376 | -9.000 | -9.000 | -999. | 552. | 155.2  | 0.01 | 0.28 |
| 1.00   |     | 6.48 | 67. | 10.0 | 276.4 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 21   | -31.0 | 0.298 | -9.000 | -9.000 | -999. | 394. | 97.7   | 0.01 | 0.28 |
| 1.00   |     | 5.19 | 65. | 10.0 | 276.4 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 22   | -29.6 | 0.285 | -9.000 | -9.000 | -999. | 365. | 89.2   | 0.01 | 0.28 |
| 1.00   |     | 4.97 | 62. | 10.0 | 276.4 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 23   | -31.5 | 0.303 | -9.000 | -9.000 | -999. | 400. | 100.8  | 0.01 | 0.28 |
| 1.00   |     | 5.27 | 61. | 10.0 | 276.4 | 2.0   |        |        |       |      |        |      |      |
| 18     | 01  | 01   | 1   | 24   | -31.5 | 0.304 | -9.000 | -9.000 | -999. | 402. | 101.6  | 0.01 | 0.28 |

1.00 5.29 63. 10.0 277.0 2.0

First hour of profile data

| YR | MO | DY | HR | HEIGHT | F | WDIR | WSPD | AMB_TMP | sigmaA | sigmaW | sigmaV |
|----|----|----|----|--------|---|------|------|---------|--------|--------|--------|
| 18 | 01 | 01 | 01 | 10.0   | 1 | 67.  | 5.51 | 276.0   | 99.0   | -99.00 | -99.00 |

F indicates top of profile (=1) or below (=0)

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
06/30/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*  
\*\*\* 17:22:57

PAGE 4

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF HIGHEST 8-HR

RESULTS \*\*\*

\*\* CONC OF CO IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID                      | DATE       | NETWORK                      | RECEPTOR  |
|-------------------------------|------------|------------------------------|-----------|
| (XR, YR, ZELEV, ZHILL, ZFLAG) | (YYMMDDHH) | AVERAGE CONC OF TYPE GRID-ID |           |
| - - - - -                     | - - - - -  | - - - - -                    | - - - - - |
| - - - - -                     | - - - - -  | - - - - -                    | - - - - - |

EG HIGH 1ST HIGH VALUE IS 10.76708 ON 21011808: AT ( 430176.34,  
5202878.50, 5.62, 5.62, 0.00) DC

EP04 HIGH 1ST HIGH VALUE IS 97.14015 ON 18081124: AT ( 430164.06,  
5203787.50, 68.49, 92.43, 0.00) DC

EP08 HIGH 1ST HIGH VALUE IS 0.36763 ON 19122724: AT ( 430188.78,  
5203015.50, 4.70, 92.43, 0.00) DC

ALL HIGH 1ST HIGH VALUE IS 97.15248 ON 18081124: AT ( 430164.06,  
5203787.50, 68.49, 92.43, 0.00) DC

\*\*\* RECEPTOR TYPES: GC = GRIDCART  
GP = GRIDPOLR  
DC = DISCCART  
DP = DISCPOLR

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*

06/30/23

\*\*\* AERMET - VERSION 22112 \*\*\*  
\*\*\* 17:22:57

PAGE 5  
\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* Message Summary : AERMOD Model Execution \*\*\*

----- Summary of Total Messages -----

A Total of 0 Fatal Error Message(s)  
A Total of 2 Warning Message(s)  
A Total of 758 Informational Message(s)  
  
A Total of 43824 Hours Were Processed  
  
A Total of 398 Calm Hours Identified  
  
A Total of 360 Missing Hours Identified ( 0.82 Percent)

\*\*\*\*\* FATAL ERROR MESSAGES \*\*\*\*\*  
\*\*\* NONE \*\*\*

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*  
SO W320 44 PPARM: Input Parameter May Be Out-of-Range for Parameter  
VS  
ME W187 11559 MEOPEN: ADJ\_U\* Option for Stable Low Winds used in AERMET



▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
06/30/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*  
\*\*\* 17:29:54

PAGE 1

\*\*\* MODELOPTs: CONC ELEV ARM2 RURAL ADJ\_U\*

\*\*\* MODEL SETUP OPTIONS SUMMARY

\*\*\*

- - - - -  
- - - - -

\*\* Model Options Selected:

- \* Model Allows User-Specified Options
- \* Model Is Setup For Calculation of Average CONCentration Values.
- \* NO GAS DEPOSITION Data Provided.
- \* NO PARTICLE DEPOSITION Data Provided.
- \* Model Uses NO DRY DEPLETION. DDPLETE = F
- \* Model Uses NO WET DEPLETION. WETDPLT = F
- \* Stack-tip Downwash.
- \* Model Accounts for ELEVated Terrain Effects.
- \* Use Calms Processing Routine.
- \* Use Missing Data Processing Routine.
- \* No Exponential Decay.
- \* Ambient Ratio Method Ver 2 (ARM2) Used for NO2 Conversion
  - with a Minimum NO2/NOx Ratio of 0.500
  - and a Maximum NO2/NOx Ratio of 0.900
- \* Model Uses RURAL Dispersion Only.
- \* ADJ\_U\* - Use ADJ\_U\* option for SBL in AERMET
- \* CCVR\_Sub - Meteorological data includes CCVR substitutions
- \* TEMP\_Sub - Meteorological data includes TEMP substitutions
- \* Model Assumes No FLAGPOLE Receptor Heights.
- \* The User Specified a Pollutant Type of: NO2

\*\*Note that special processing requirements apply for the 1-hour NO2 NAAQS - check available guidance.

Model will process user-specified ranks of daily maximum 1-hour values averaged across the number of years modeled.

For annual NO2 NAAQS modeling, the multi-year maximum of PERIOD values can be simulated using the MULTYEAR keyword.

Multi-year PERIOD and 1-hour values should only be done in a single model run using the MULTYEAR option with a single multi-year meteorological data file using STARTEND keyword.

\*\*Model Calculates 1 Short Term Average(s) of: 1-HR

\*\*This Run Includes: 3 Source(s); 4 Source Group(s); and 11358 Receptor(s)

with: 3 POINT(s), including  
0 POINTCAP(s) and 0 POINTHOR(s)  
and: 0 VOLUME source(s)  
and: 0 AREA type source(s)  
and: 0 LINE source(s)  
and: 0 RLINE/RLINEXT source(s)  
and: 0 OPENPIT source(s)  
and: 0 BUOYANT LINE source(s) with a total of 0 line(s)  
and: 0 SWPOINT source(s)

\*\*Model Set To Continue RUNning After the Setup Testing.

\*\*The AERMET Input Meteorological Data Version Date: 22112

\*\*Output Options Selected:

Model Outputs Tables of Highest Short Term Values by Receptor (RECTABLE  
Keyword)

Model Outputs External File(s) of High Values for Plotting (PLOTFILE  
Keyword)

Model Outputs Separate Summary File of High Ranked Values (SUMMFILE  
Keyword)

Model Outputs External File(s) of Maximum Daily 1-hr Values by Day  
(MAXDAILY Keyword)

Model Outputs External File(s) of Maximum Daily 1-hr Values by Year  
(MXDYBYR Keyword)

\*\*NOTE: The Following Flags May Appear Following CONC Values: c for Calm Hours  
m for Missing Hours  
b for Both Calm and

Missing Hours

\*\*Misc. Inputs: Base Elev. for Pot. Temp. Profile (m MSL) = 5.50 ; Decay  
Coef. = 0.000 ; Rot. Angle = 0.0

Emission Units = GRAMS/SEC ;

Emission Rate Unit Factor = 0.10000E+07

Output Units = MICROGRAMS/M\*\*3

\*\*Approximate Storage Requirements of Model = 11.0 MB of RAM.

\*\*Input Runstream File: aermod.inp

\*\*Output Print File: aermod.out

\*\*Detailed Error/Message File: HOQUIAMPROJECT\_N02\_1HR.ERR

\*\*File for Summary of Results: HOQUIAMPROJECT\_N02\_1HR.SUM

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
06/30/23

```
*** AERMET - VERSION 22112 *** ***
***                               17:29:54
```

PAGE 2

```
*** MODELOPTs:      CONC  ELEV  ARM2  RURAL  ADJ_U*
```

\*\*\* METEOROLOGICAL DAYS SELECTED FOR

PROCESSING \*\*\*

(1=YES; 0=NO)

[illegible]

NOTE: METEOROLOGICAL DATA ACTUALLY PROCESSED WILL ALSO DEPEND ON WHAT IS INCLUDED IN THE DATA FILE.

\*\*\* UPPER BOUND OF FIRST THROUGH FIFTH WIND SPEED

CATEGORIES \*\*\*

(METERS/SEC)

1.54, 3.09, 5.14, 8.23,

10.80,

\*\*\* AERMOD - VERSION 22112 \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
06/30/23

```
*** AERMET - VERSION 22112 ***  
*** 17:29:54
```

PAGE 3

```
*** MODELOPTs:      CONC  ELEV  ARM2  RURAL  ADJ  U*
```

\*\*\* UP TO THE FIRST 24 HOURS OF METEOROLOGICAL

DATA \*\*\*

Surface file: KHQM.5Y.SFC  
Met Version: 22112  
Profile file: KHQM.5Y.PFL

Surface format: FREE

Profile format: FREE

Surface station no.: 94225  
Name: BOWERMAN AIRPORT

Upper air station no.: 72797  
Name: QUILLAYUTE

Year: 2018

Year: 2018

## First 24 hours of scalar data

|        |     |    |     |    |     |    |    |       |       |       |     |     |    |       |
|--------|-----|----|-----|----|-----|----|----|-------|-------|-------|-----|-----|----|-------|
| YR     | MO  | DY | JDY | HR | H0  | U* | W* | DT/DZ | ZICNV | ZIMCH | M-O | LEN | Z0 | BOWEN |
| ALBEDO | REF | WS | WD  | HT | REF | TA | HT |       |       |       |     |     |    |       |

|      |    |      |   |     |       |       |        |        |       |      |        |      |      |
|------|----|------|---|-----|-------|-------|--------|--------|-------|------|--------|------|------|
| 18   | 01 | 01   | 1 | 01  | -33.0 | 0.317 | -9.000 | -9.000 | -999. | 429. | 110.6  | 0.01 | 0.28 |
| 1.00 |    | 5.51 |   | 67. | 10.0  | 275.9 | 2.0    |        |       |      |        |      |      |
| 18   | 01 | 01   | 1 | 02  | -42.0 | 0.403 | -9.000 | -9.000 | -999. | 614. | 178.7  | 0.07 | 0.28 |
| 1.00 |    | 5.10 |   | 51. | 10.0  | 275.3 | 2.0    |        |       |      |        |      |      |
| 18   | 01 | 01   | 1 | 03  | -42.5 | 0.408 | -9.000 | -9.000 | -999. | 625. | 183.1  | 0.07 | 0.28 |
| 1.00 |    | 5.16 |   | 54. | 10.0  | 275.3 | 2.0    |        |       |      |        |      |      |
| 18   | 01 | 01   | 1 | 04  | -35.4 | 0.339 | -9.000 | -9.000 | -999. | 477. | 126.4  | 0.07 | 0.28 |
| 1.00 |    | 4.32 |   | 50. | 10.0  | 275.3 | 2.0    |        |       |      |        |      |      |
| 18   | 01 | 01   | 1 | 05  | -35.2 | 0.337 | -9.000 | -9.000 | -999. | 469. | 124.6  | 0.07 | 0.28 |
| 1.00 |    | 4.29 |   | 58. | 10.0  | 274.8 | 2.0    |        |       |      |        |      |      |
| 18   | 01 | 01   | 1 | 06  | -36.6 | 0.350 | -9.000 | -9.000 | -999. | 498. | 135.1  | 0.07 | 0.28 |
| 1.00 |    | 4.46 |   | 50. | 10.0  | 274.8 | 2.0    |        |       |      |        |      |      |
| 18   | 01 | 01   | 1 | 07  | -32.7 | 0.340 | -9.000 | -9.000 | -999. | 475. | 126.8  | 0.07 | 0.28 |
| 0.58 |    | 4.32 |   | 51. | 10.0  | 274.8 | 2.0    |        |       |      |        |      |      |
| 18   | 01 | 01   | 1 | 08  | -0.5  | 0.283 | -9.000 | -9.000 | -999. | 363. | 4158.0 | 0.01 | 0.28 |
| 0.35 |    | 4.71 |   | 62. | 10.0  | 276.4 | 2.0    |        |       |      |        |      |      |
| 18   | 01 | 01   | 1 | 09  | 14.1  | 0.378 | 0.287  | 0.007  | 61.   | 558. | -351.0 | 0.01 | 0.28 |
| 0.26 |    | 6.19 |   | 68. | 10.0  | 277.5 | 2.0    |        |       |      |        |      |      |
| 18   | 01 | 01   | 1 | 10  | 23.1  | 0.354 | 0.427  | 0.008  | 123.  | 506. | -175.6 | 0.01 | 0.28 |
| 0.22 |    | 5.72 |   | 63. | 10.0  | 278.8 | 2.0    |        |       |      |        |      |      |
| 18   | 01 | 01   | 1 | 11  | 25.3  | 0.448 | 0.480  | 0.010  | 160.  | 720. | -325.6 | 0.01 | 0.28 |
| 0.21 |    | 7.33 |   | 72. | 10.0  | 279.2 | 2.0    |        |       |      |        |      |      |
| 18   | 01 | 01   | 1 | 12  | 20.7  | 0.394 | 0.464  | 0.008  | 176.  | 597. | -270.7 | 0.01 | 0.28 |
| 0.23 |    | 6.43 |   | 65. | 10.0  | 280.3 | 2.0    |        |       |      |        |      |      |
| 18   | 01 | 01   | 1 | 13  | 9.6   | 0.397 | 0.365  | 0.008  | 184.  | 599. | -591.9 | 0.01 | 0.28 |
| 0.28 |    | 6.53 |   | 73. | 10.0  | 280.3 | 2.0    |        |       |      |        |      |      |
| 18   | 01 | 01   | 1 | 14  | -19.9 | 0.452 | -9.000 | -9.000 | -999. | 729. | 426.1  | 0.07 | 0.28 |
| 0.41 |    | 5.60 |   | 59. | 10.0  | 278.8 | 2.0    |        |       |      |        |      |      |
| 18   | 01 | 01   | 1 | 15  | -33.5 | 0.324 | -9.000 | -9.000 | -999. | 454. | 115.3  | 0.01 | 0.28 |
| 1.00 |    | 5.62 |   | 72. | 10.0  | 278.1 | 2.0    |        |       |      |        |      |      |

|          |      |       |       |        |        |       |      |       |      |      |
|----------|------|-------|-------|--------|--------|-------|------|-------|------|------|
| 18 01 01 | 1 16 | -32.9 | 0.317 | -9.000 | -9.000 | -999. | 429. | 110.7 | 0.01 | 0.28 |
| 1.00     | 5.51 | 71.   | 10.0  | 277.5  | 2.0    |       |      |       |      |      |
| 18 01 01 | 1 17 | -25.5 | 0.246 | -9.000 | -9.000 | -999. | 295. | 66.7  | 0.01 | 0.28 |
| 1.00     | 4.32 | 62.   | 10.0  | 277.0  | 2.0    |       |      |       |      |      |
| 18 01 01 | 1 18 | -30.6 | 0.295 | -9.000 | -9.000 | -999. | 385. | 95.7  | 0.01 | 0.28 |
| 1.00     | 5.14 | 62.   | 10.0  | 277.5  | 2.0    |       |      |       |      |      |
| 18 01 01 | 1 19 | -35.3 | 0.340 | -9.000 | -9.000 | -999. | 476. | 127.2 | 0.01 | 0.28 |
| 1.00     | 5.89 | 66.   | 10.0  | 276.4  | 2.0    |       |      |       |      |      |
| 18 01 01 | 1 20 | -39.1 | 0.376 | -9.000 | -9.000 | -999. | 552. | 155.2 | 0.01 | 0.28 |
| 1.00     | 6.48 | 67.   | 10.0  | 276.4  | 2.0    |       |      |       |      |      |
| 18 01 01 | 1 21 | -31.0 | 0.298 | -9.000 | -9.000 | -999. | 394. | 97.7  | 0.01 | 0.28 |
| 1.00     | 5.19 | 65.   | 10.0  | 276.4  | 2.0    |       |      |       |      |      |
| 18 01 01 | 1 22 | -29.6 | 0.285 | -9.000 | -9.000 | -999. | 365. | 89.2  | 0.01 | 0.28 |
| 1.00     | 4.97 | 62.   | 10.0  | 276.4  | 2.0    |       |      |       |      |      |
| 18 01 01 | 1 23 | -31.5 | 0.303 | -9.000 | -9.000 | -999. | 400. | 100.8 | 0.01 | 0.28 |
| 1.00     | 5.27 | 61.   | 10.0  | 276.4  | 2.0    |       |      |       |      |      |
| 18 01 01 | 1 24 | -31.5 | 0.304 | -9.000 | -9.000 | -999. | 402. | 101.6 | 0.01 | 0.28 |
| 1.00     | 5.29 | 63.   | 10.0  | 277.0  | 2.0    |       |      |       |      |      |

First hour of profile data

| YR | MO | DY | HR | HEIGHT | F | WDIR | WSPD | AMB_TMP | sigmaA | sigmaW | sigmaV |
|----|----|----|----|--------|---|------|------|---------|--------|--------|--------|
| 18 | 01 | 01 | 01 | 10.0   | 1 | 67.  | 5.51 | 276.0   | 99.0   | -99.00 | -99.00 |

F indicates top of profile (=1) or below (=0)

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
06/30/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*

\*\*\* 17:29:54

PAGE 4

\*\*\* MODELOPTs: CONC ELEV ARM2 RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 1ST-HIGHEST MAX DAILY 1-HR  
RESULTS AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF NO2 IN MICROGRAMS/M\*\*3

\*\*

NETWORK

| GROUP ID      | OF TYPE   | GRID-ID   | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |
|---------------|-----------|-----------|--------------|--------------------------|
| ZHILL, ZFLAG) |           |           |              |                          |
| - - - - -     | - - - - - | - - - - - | - - - - -    | - - - - -                |
| - - - - -     | - - - - - | - - - - - | - - - - -    | - - - - -                |

EG 1ST HIGHEST VALUE IS 137.10549 AT ( 430213.66, 5202866.50, 5.56,  
5.56, 0.00) DC

|        |                       |                |            |             |        |
|--------|-----------------------|----------------|------------|-------------|--------|
|        | 2ND HIGHEST VALUE IS  | 137.02914 AT ( | 430213.66, | 5202878.50, | 5.21,  |
| 5.21,  | 0.00) DC              |                |            |             |        |
|        | 3RD HIGHEST VALUE IS  | 136.89795 AT ( | 430201.22, | 5202866.50, | 5.54,  |
| 5.54,  | 0.00) DC              |                |            |             |        |
|        | 4TH HIGHEST VALUE IS  | 136.88320 AT ( | 430226.09, | 5202878.50, | 5.11,  |
| 5.11,  | 0.00) DC              |                |            |             |        |
|        | 5TH HIGHEST VALUE IS  | 136.83707 AT ( | 430226.23, | 5202887.43, | 4.82,  |
| 4.82,  | 0.00) DC              |                |            |             |        |
|        | 6TH HIGHEST VALUE IS  | 136.70627 AT ( | 430188.78, | 5202866.50, | 5.51,  |
| 5.51,  | 0.00) DC              |                |            |             |        |
|        | 7TH HIGHEST VALUE IS  | 136.57314 AT ( | 430237.07, | 5202886.76, | 4.99,  |
| 4.99,  | 0.00) DC              |                |            |             |        |
|        | 8TH HIGHEST VALUE IS  | 136.41638 AT ( | 430188.78, | 5202854.00, | 5.09,  |
| 5.09,  | 0.00) DC              |                |            |             |        |
|        | 9TH HIGHEST VALUE IS  | 136.41481 AT ( | 430226.09, | 5202866.50, | 5.59,  |
| 5.59,  | 0.00) DC              |                |            |             |        |
|        | 10TH HIGHEST VALUE IS | 136.32913 AT ( | 430201.22, | 5202878.50, | 5.16,  |
| 5.16,  | 0.00) DC              |                |            |             |        |
| EP04   | 1ST HIGHEST VALUE IS  | 231.60448 AT ( | 430413.00, | 5203787.50, | 72.04, |
| 92.43, | 0.00) DC              |                |            |             |        |
|        | 2ND HIGHEST VALUE IS  | 206.12485 AT ( | 430164.06, | 5203787.50, | 68.49, |
| 92.43, | 0.00) DC              |                |            |             |        |
|        | 3RD HIGHEST VALUE IS  | 198.43931 AT ( | 430188.97, | 5203787.50, | 69.43, |
| 92.43, | 0.00) DC              |                |            |             |        |
|        | 4TH HIGHEST VALUE IS  | 196.93895 AT ( | 430213.84, | 5203787.50, | 71.57, |
| 92.43, | 0.00) DC              |                |            |             |        |
|        | 5TH HIGHEST VALUE IS  | 192.75789 AT ( | 430437.91, | 5203787.50, | 65.49, |
| 92.43, | 0.00) DC              |                |            |             |        |
|        | 6TH HIGHEST VALUE IS  | 192.55521 AT ( | 430388.09, | 5203762.50, | 64.80, |
| 92.43, | 0.00) DC              |                |            |             |        |
|        | 7TH HIGHEST VALUE IS  | 191.03345 AT ( | 430139.16, | 5203787.50, | 71.39, |
| 89.87, | 0.00) DC              |                |            |             |        |
|        | 8TH HIGHEST VALUE IS  | 189.96155 AT ( | 430388.09, | 5203787.50, | 81.43, |
| 92.43, | 0.00) DC              |                |            |             |        |
|        | 9TH HIGHEST VALUE IS  | 187.64676 AT ( | 430139.16, | 5203812.50, | 73.55, |
| 89.87, | 0.00) DC              |                |            |             |        |
|        | 10TH HIGHEST VALUE IS | 187.47058 AT ( | 430114.28, | 5203787.50, | 68.69, |
| 89.87, | 0.00) DC              |                |            |             |        |
| EP08   | 1ST HIGHEST VALUE IS  | 1.31390 AT (   | 430648.78, | 5203562.50, | 4.74,  |
| 92.43, | 0.00) DC              |                |            |             |        |
|        | 2ND HIGHEST VALUE IS  | 1.31278 AT (   | 430648.78, | 5203550.00, | 4.78,  |
| 92.43, | 0.00) DC              |                |            |             |        |
|        | 3RD HIGHEST VALUE IS  | 1.30919 AT (   | 430648.78, | 5203537.50, | 4.77,  |
| 92.43, | 0.00) DC              |                |            |             |        |
|        | 4TH HIGHEST VALUE IS  | 1.30270 AT (   | 430648.78, | 5203525.00, | 4.69,  |
| 92.43, | 0.00) DC              |                |            |             |        |
|        | 5TH HIGHEST VALUE IS  | 1.30195 AT (   | 430661.94, | 5203587.50, | 4.88,  |
| 92.43, | 0.00) DC              |                |            |             |        |

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| 92.43, | 6TH HIGHEST VALUE IS  | 1.30074 AT ( | 430661.94, | 5203612.50, | 4.82, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 7TH HIGHEST VALUE IS  | 1.30045 AT ( | 430661.22, | 5203562.50, | 4.87, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 8TH HIGHEST VALUE IS  | 1.29872 AT ( | 430648.78, | 5203513.00, | 4.69, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 9TH HIGHEST VALUE IS  | 1.29693 AT ( | 430661.94, | 5203637.50, | 4.81, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 10TH HIGHEST VALUE IS | 1.29664 AT ( | 430661.22, | 5203550.00, | 4.85, |
|        | 0.00) DC              |              |            |             |       |

|        |                       |                |            |             |        |
|--------|-----------------------|----------------|------------|-------------|--------|
| ALL    | 1ST HIGHEST VALUE IS  | 231.61609 AT ( | 430413.00, | 5203787.50, | 72.04, |
| 92.43, | 0.00) DC              |                |            |             |        |
| 92.43, | 2ND HIGHEST VALUE IS  | 206.23750 AT ( | 430164.06, | 5203787.50, | 68.49, |
|        | 0.00) DC              |                |            |             |        |
| 92.43, | 3RD HIGHEST VALUE IS  | 198.50641 AT ( | 430188.97, | 5203787.50, | 69.43, |
|        | 0.00) DC              |                |            |             |        |
| 92.43, | 4TH HIGHEST VALUE IS  | 196.98366 AT ( | 430213.84, | 5203787.50, | 71.57, |
|        | 0.00) DC              |                |            |             |        |
| 92.43, | 5TH HIGHEST VALUE IS  | 192.78588 AT ( | 430437.91, | 5203787.50, | 65.49, |
|        | 0.00) DC              |                |            |             |        |
| 92.43, | 6TH HIGHEST VALUE IS  | 192.57038 AT ( | 430388.09, | 5203762.50, | 64.80, |
|        | 0.00) DC              |                |            |             |        |
| 89.87, | 7TH HIGHEST VALUE IS  | 191.09243 AT ( | 430139.16, | 5203787.50, | 71.39, |
|        | 0.00) DC              |                |            |             |        |
| 92.43, | 8TH HIGHEST VALUE IS  | 189.97931 AT ( | 430388.09, | 5203787.50, | 81.43, |
|        | 0.00) DC              |                |            |             |        |
| 89.87, | 9TH HIGHEST VALUE IS  | 187.69158 AT ( | 430139.16, | 5203812.50, | 73.55, |
|        | 0.00) DC              |                |            |             |        |
| 89.87, | 10TH HIGHEST VALUE IS | 187.58005 AT ( | 430114.28, | 5203787.50, | 68.69, |
|        | 0.00) DC              |                |            |             |        |

^ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*  
 C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
 06/30/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*  
 \*\*\* 17:29:54

PAGE 5

\*\*\* MODELOPTs: CONC ELEV ARM2 RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 8TH-HIGHEST MAX DAILY 1-HR  
 RESULTS AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF NO2 IN MICROGRAMS/M\*\*3

\*\*

NETWORK

|          |              |                          |
|----------|--------------|--------------------------|
| GROUP ID | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |
|----------|--------------|--------------------------|



ZHILL, ZFLAG) OF TYPE GRID-ID

|      |                       |                |            |             |        |
|------|-----------------------|----------------|------------|-------------|--------|
| EG   | 1ST HIGHEST VALUE IS  | 128.63206 AT ( | 430176.34, | 5202891.00, | 5.57,  |
|      | 5.57, 0.00) DC        |                |            |             |        |
|      | 2ND HIGHEST VALUE IS  | 128.59427 AT ( | 430176.34, | 5202878.50, | 5.62,  |
|      | 5.62, 0.00) DC        |                |            |             |        |
|      | 3RD HIGHEST VALUE IS  | 128.49123 AT ( | 430201.22, | 5202866.50, | 5.54,  |
|      | 5.54, 0.00) DC        |                |            |             |        |
|      | 4TH HIGHEST VALUE IS  | 128.27339 AT ( | 430213.66, | 5202878.50, | 5.21,  |
|      | 5.21, 0.00) DC        |                |            |             |        |
|      | 5TH HIGHEST VALUE IS  | 128.11470 AT ( | 430198.73, | 5202890.43, | 4.91,  |
|      | 4.91, 0.00) DC        |                |            |             |        |
|      | 6TH HIGHEST VALUE IS  | 128.09502 AT ( | 430201.22, | 5202878.50, | 5.16,  |
|      | 5.16, 0.00) DC        |                |            |             |        |
|      | 7TH HIGHEST VALUE IS  | 127.99671 AT ( | 430188.78, | 5202866.50, | 5.51,  |
|      | 5.51, 0.00) DC        |                |            |             |        |
|      | 8TH HIGHEST VALUE IS  | 127.97319 AT ( | 430176.34, | 5202903.50, | 5.56,  |
|      | 5.56, 0.00) DC        |                |            |             |        |
|      | 9TH HIGHEST VALUE IS  | 127.79011 AT ( | 430188.78, | 5202903.50, | 4.79,  |
|      | 4.79, 0.00) DC        |                |            |             |        |
|      | 10TH HIGHEST VALUE IS | 127.78295 AT ( | 430188.78, | 5202878.50, | 5.48,  |
|      | 5.48, 0.00) DC        |                |            |             |        |
| EP04 | 1ST HIGHEST VALUE IS  | 134.68411 AT ( | 430528.06, | 5203862.50, | 71.41, |
|      | 92.43, 0.00) DC       |                |            |             |        |
|      | 2ND HIGHEST VALUE IS  | 134.31399 AT ( | 430413.00, | 5203787.50, | 72.04, |
|      | 92.43, 0.00) DC       |                |            |             |        |
|      | 3RD HIGHEST VALUE IS  | 133.83107 AT ( | 430388.09, | 5203762.50, | 64.80, |
|      | 92.43, 0.00) DC       |                |            |             |        |
|      | 4TH HIGHEST VALUE IS  | 133.57192 AT ( | 430626.53, | 5203862.50, | 65.38, |
|      | 92.43, 0.00) DC       |                |            |             |        |
|      | 5TH HIGHEST VALUE IS  | 133.32558 AT ( | 430487.69, | 5203812.50, | 72.07, |
|      | 92.43, 0.00) DC       |                |            |             |        |
|      | 6TH HIGHEST VALUE IS  | 133.30431 AT ( | 430675.75, | 5203912.50, | 66.85, |
|      | 81.74, 0.00) DC       |                |            |             |        |
|      | 7TH HIGHEST VALUE IS  | 131.82432 AT ( | 430577.28, | 5203912.50, | 72.20, |
|      | 91.58, 0.00) DC       |                |            |             |        |
|      | 8TH HIGHEST VALUE IS  | 131.62134 AT ( | 430331.13, | 5203862.50, | 70.78, |
|      | 92.43, 0.00) DC       |                |            |             |        |
|      | 9TH HIGHEST VALUE IS  | 131.21753 AT ( | 430626.53, | 5203912.50, | 65.68, |
|      | 92.43, 0.00) DC       |                |            |             |        |
|      | 10TH HIGHEST VALUE IS | 130.65646 AT ( | 430363.22, | 5203762.50, | 63.14, |
|      | 92.43, 0.00) DC       |                |            |             |        |
| EP08 | 1ST HIGHEST VALUE IS  | 1.03793 AT (   | 430710.94, | 5203376.00, | 4.80,  |
|      | 92.43, 0.00) DC       |                |            |             |        |
|      | 2ND HIGHEST VALUE IS  | 1.03279 AT (   | 430706.77, | 5203323.96, | 4.62,  |
|      | 92.43, 0.00) DC       |                |            |             |        |

|        |                       |                |            |             |        |
|--------|-----------------------|----------------|------------|-------------|--------|
| 92.43, | 3RD HIGHEST VALUE IS  | 1.03189 AT (   | 430686.09, | 5203338.50, | 4.91,  |
|        | 0.00) DC              |                |            |             |        |
| 92.43, | 4TH HIGHEST VALUE IS  | 1.03134 AT (   | 430686.09, | 5203363.50, | 4.57,  |
|        | 0.00) DC              |                |            |             |        |
| 92.43, | 5TH HIGHEST VALUE IS  | 1.03097 AT (   | 430698.50, | 5203351.00, | 4.64,  |
|        | 0.00) DC              |                |            |             |        |
| 92.43, | 6TH HIGHEST VALUE IS  | 1.03070 AT (   | 430710.94, | 5203338.50, | 4.43,  |
|        | 0.00) DC              |                |            |             |        |
| 92.43, | 7TH HIGHEST VALUE IS  | 1.03028 AT (   | 430698.50, | 5203338.50, | 4.61,  |
|        | 0.00) DC              |                |            |             |        |
| 92.43, | 8TH HIGHEST VALUE IS  | 1.02906 AT (   | 430698.50, | 5203363.50, | 4.35,  |
|        | 0.00) DC              |                |            |             |        |
| 92.43, | 9TH HIGHEST VALUE IS  | 1.02881 AT (   | 430188.78, | 5203028.00, | 4.70,  |
|        | 0.00) DC              |                |            |             |        |
| 92.43, | 10TH HIGHEST VALUE IS | 1.02869 AT (   | 430176.34, | 5203028.00, | 5.19,  |
|        | 0.00) DC              |                |            |             |        |
| ALL    | 1ST HIGHEST VALUE IS  | 135.38364 AT ( | 430413.00, | 5203787.50, | 72.04, |
| 92.43, | 0.00) DC              |                |            |             |        |
| 92.43, | 2ND HIGHEST VALUE IS  | 135.04348 AT ( | 430528.06, | 5203862.50, | 71.41, |
|        | 0.00) DC              |                |            |             |        |
| 92.43, | 3RD HIGHEST VALUE IS  | 134.11855 AT ( | 430388.09, | 5203762.50, | 64.80, |
|        | 0.00) DC              |                |            |             |        |
| 92.43, | 4TH HIGHEST VALUE IS  | 134.04070 AT ( | 430626.53, | 5203862.50, | 65.38, |
|        | 0.00) DC              |                |            |             |        |
| 92.43, | 5TH HIGHEST VALUE IS  | 133.89082 AT ( | 430487.69, | 5203812.50, | 72.07, |
|        | 0.00) DC              |                |            |             |        |
| 81.74, | 6TH HIGHEST VALUE IS  | 133.81313 AT ( | 430675.75, | 5203912.50, | 66.85, |
|        | 0.00) DC              |                |            |             |        |
| 91.58, | 7TH HIGHEST VALUE IS  | 132.39832 AT ( | 430577.28, | 5203912.50, | 72.20, |
|        | 0.00) DC              |                |            |             |        |
| 92.43, | 8TH HIGHEST VALUE IS  | 132.25378 AT ( | 430331.13, | 5203862.50, | 70.78, |
|        | 0.00) DC              |                |            |             |        |
| 92.43, | 9TH HIGHEST VALUE IS  | 131.92889 AT ( | 430626.53, | 5203912.50, | 65.68, |
|        | 0.00) DC              |                |            |             |        |
| 92.43, | 10TH HIGHEST VALUE IS | 131.07192 AT ( | 430437.91, | 5203787.50, | 65.49, |
|        | 0.00) DC              |                |            |             |        |

\*\*\* RECEPTOR TYPES: GC = GRIDCART  
GP = GRIDPOLR  
DC = DISCCART  
DP = DISCPOLR

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
06/30/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*  
\*\*\*

17:29:54

\*\*\* MODELOPTs:    CONC   ELEV   ARM2   RURAL   ADJ\_U\*

\*\*\* Message Summary : AERMOD Model Execution \*\*\*

----- Summary of Total Messages -----

A Total of                0 Fatal Error Message(s)

A Total of                2 Warning Message(s)

A Total of                758 Informational Message(s)

A Total of                43824 Hours Were Processed

A Total of                398 Calm Hours Identified

A Total of                360 Missing Hours Identified (   0.82 Percent)

\*\*\*\*\* FATAL ERROR MESSAGES \*\*\*\*\*  
      \*\*\*    NONE    \*\*\*

\*\*\*\*\*    WARNING MESSAGES    \*\*\*\*\*  
SO W320        46            PPARM: Input Parameter May Be Out-of-Range for Parameter  
              VS  
ME W187    11561            MEOPEN: ADJ\_U\* Option for Stable Low Winds used in AERMET

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
06/30/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*  
\*\*\* 17:46:08

PAGE 1

\*\*\* MODELOPTs: CONC ELEV ARM2 RURAL ADJ\_U\*

\*\*\* MODEL SETUP OPTIONS SUMMARY

\*\*\*

\*\*- Model Options Selected:

- \* Model Allows User-Specified Options
- \* Model Is Setup For Calculation of Average CONCentration Values.
- \* NO GAS DEPOSITION Data Provided.
- \* NO PARTICLE DEPOSITION Data Provided.
- \* Model Uses NO DRY DEPLETION. DDPLETE = F
- \* Model Uses NO WET DEPLETION. WETDPLT = F
- \* Stack-tip Downwash.
- \* Model Accounts for ELEVated Terrain Effects.
- \* Use Calms Processing Routine.
- \* Use Missing Data Processing Routine.
- \* No Exponential Decay.
- \* Ambient Ratio Method Ver 2 (ARM2) Used for NO2 Conversion
  - with a Minimum NO2/NOx Ratio of 0.500
  - and a Maximum NO2/NOx Ratio of 0.900
- \* Model Uses RURAL Dispersion Only.
- \* ADJ\_U\* - Use ADJ\_U\* option for SBL in AERMET
- \* CCVR\_Sub - Meteorological data includes CCVR substitutions
- \* TEMP\_Sub - Meteorological data includes TEMP substitutions
- \* Model Assumes No FLAGPOLE Receptor Heights.
- \* The User Specified a Pollutant Type of: NO2

\*\*NOTE: Special processing requirements applicable for the 1-hour NO2 NAAQS have been disabled!!!

User has specified non-standard averaging periods:

High ranked 1-hour values are NOT averaged across the number of years modeled, and complete years of data are NOT required.

\*\*Model Calculates ANNUAL Averages Only

\*\*This Run Includes: 3 Source(s); 4 Source Group(s); and 11358 Receptor(s)

with: 3 POINT(s), including

0 POINTCAP(s) and 0 POINTHOR(s)  
and: 0 VOLUME source(s)  
and: 0 AREA type source(s)  
and: 0 LINE source(s)  
and: 0 RLINE/RLINEXT source(s)  
and: 0 OPENPIT source(s)  
and: 0 BUOYANT LINE source(s) with a total of 0 line(s)  
and: 0 SWPOINT source(s)

\*\*Model Set To Continue RUNning After the Setup Testing.

\*\*The AERMET Input Meteorological Data Version Date: 22112

\*\*Output Options Selected:

Model Outputs Tables of ANNUAL Averages by Receptor

Model Outputs External File(s) of High Values for Plotting (PLOTFILE  
Keyword)

Model Outputs Separate Summary File of High Ranked Values (SUMMFILE  
Keyword)

\*\*NOTE: The Following Flags May Appear Following CONC Values: c for Calm Hours  
m for Missing Hours  
b for Both Calm and

Missing Hours

\*\*Misc. Inputs: Base Elev. for Pot. Temp. Profile (m MSL) = 5.50 ; Decay  
Coef. = 0.000 ; Rot. Angle = 0.0  
Emission Units = GRAMS/SEC ;  
Emission Rate Unit Factor = 0.10000E+07  
Output Units = MICROGRAMS/M\*\*3

\*\*Approximate Storage Requirements of Model = 5.7 MB of RAM.

\*\*Input Runstream File: aermod.inp

\*\*Output Print File: aermod.out

\*\*Detailed Error/Message File: HOQUIAMPROJECT\_NO2\_ANNUAL.ERR

\*\*File for Summary of Results: HOQUIAMPROJECT\_NO2\_ANNUAL.SUM

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
06/30/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*  
\*\*\* 17:46:08

```

*** METEOROLOGICAL DAYS SELECTED FOR
PROCESSING ***

```

[illegible]

\*\*\* UPPER BOUND OF FIRST THROUGH FIFTH WIND SPEED

(METERS/SEC)

Surface format: FREE

Profile format: FREE

Surface station no.: 94225  
Name: BOWERMAN\_AIRPORT

Upper air station no.: 72797  
Name: QUILLAYUTE

Year: 2018

Year: 2018

First 24 hours of scalar data

| YR     | MO   | DY  | JDY  | HR    | H0    | U*    | W*     | DT/DZ  | ZICNV | ZIMCH | M-O    | LEN  | Z0   | BOWEN |
|--------|------|-----|------|-------|-------|-------|--------|--------|-------|-------|--------|------|------|-------|
| ALBEDO | REF  | WS  | WD   | HT    | REF   | TA    | HT     |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 01    | -33.0 | 0.317 | -9.000 | -9.000 | -999. | 429.  | 110.6  | 0.01 | 0.28 |       |
| 1.00   | 5.51 | 67. | 10.0 | 275.9 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 02    | -42.0 | 0.403 | -9.000 | -9.000 | -999. | 614.  | 178.7  | 0.07 | 0.28 |       |
| 1.00   | 5.10 | 51. | 10.0 | 275.3 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 03    | -42.5 | 0.408 | -9.000 | -9.000 | -999. | 625.  | 183.1  | 0.07 | 0.28 |       |
| 1.00   | 5.16 | 54. | 10.0 | 275.3 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 04    | -35.4 | 0.339 | -9.000 | -9.000 | -999. | 477.  | 126.4  | 0.07 | 0.28 |       |
| 1.00   | 4.32 | 50. | 10.0 | 275.3 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 05    | -35.2 | 0.337 | -9.000 | -9.000 | -999. | 469.  | 124.6  | 0.07 | 0.28 |       |
| 1.00   | 4.29 | 58. | 10.0 | 274.8 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 06    | -36.6 | 0.350 | -9.000 | -9.000 | -999. | 498.  | 135.1  | 0.07 | 0.28 |       |
| 1.00   | 4.46 | 50. | 10.0 | 274.8 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 07    | -32.7 | 0.340 | -9.000 | -9.000 | -999. | 475.  | 126.8  | 0.07 | 0.28 |       |
| 0.58   | 4.32 | 51. | 10.0 | 274.8 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 08    | -0.5  | 0.283 | -9.000 | -9.000 | -999. | 363.  | 4158.0 | 0.01 | 0.28 |       |
| 0.35   | 4.71 | 62. | 10.0 | 276.4 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 09    | 14.1  | 0.378 | 0.287  | 0.007  | 61.   | 558.  | -351.0 | 0.01 | 0.28 |       |
| 0.26   | 6.19 | 68. | 10.0 | 277.5 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 10    | 23.1  | 0.354 | 0.427  | 0.008  | 123.  | 506.  | -175.6 | 0.01 | 0.28 |       |
| 0.22   | 5.72 | 63. | 10.0 | 278.8 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 11    | 25.3  | 0.448 | 0.480  | 0.010  | 160.  | 720.  | -325.6 | 0.01 | 0.28 |       |
| 0.21   | 7.33 | 72. | 10.0 | 279.2 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 12    | 20.7  | 0.394 | 0.464  | 0.008  | 176.  | 597.  | -270.7 | 0.01 | 0.28 |       |
| 0.23   | 6.43 | 65. | 10.0 | 280.3 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 13    | 9.6   | 0.397 | 0.365  | 0.008  | 184.  | 599.  | -591.9 | 0.01 | 0.28 |       |
| 0.28   | 6.53 | 73. | 10.0 | 280.3 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 14    | -19.9 | 0.452 | -9.000 | -9.000 | -999. | 729.  | 426.1  | 0.07 | 0.28 |       |
| 0.41   | 5.60 | 59. | 10.0 | 278.8 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 15    | -33.5 | 0.324 | -9.000 | -9.000 | -999. | 454.  | 115.3  | 0.01 | 0.28 |       |
| 1.00   | 5.62 | 72. | 10.0 | 278.1 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 16    | -32.9 | 0.317 | -9.000 | -9.000 | -999. | 429.  | 110.7  | 0.01 | 0.28 |       |
| 1.00   | 5.51 | 71. | 10.0 | 277.5 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 17    | -25.5 | 0.246 | -9.000 | -9.000 | -999. | 295.  | 66.7   | 0.01 | 0.28 |       |
| 1.00   | 4.32 | 62. | 10.0 | 277.0 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 18    | -30.6 | 0.295 | -9.000 | -9.000 | -999. | 385.  | 95.7   | 0.01 | 0.28 |       |
| 1.00   | 5.14 | 62. | 10.0 | 277.5 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 19    | -35.3 | 0.340 | -9.000 | -9.000 | -999. | 476.  | 127.2  | 0.01 | 0.28 |       |



|          |      |       |       |        |        |       |      |       |      |      |  |  |
|----------|------|-------|-------|--------|--------|-------|------|-------|------|------|--|--|
| 1.00     | 5.89 | 66.   | 10.0  | 276.4  | 2.0    |       |      |       |      |      |  |  |
| 18 01 01 | 1 20 | -39.1 | 0.376 | -9.000 | -9.000 | -999. | 552. | 155.2 | 0.01 | 0.28 |  |  |
| 1.00     | 6.48 | 67.   | 10.0  | 276.4  | 2.0    |       |      |       |      |      |  |  |
| 18 01 01 | 1 21 | -31.0 | 0.298 | -9.000 | -9.000 | -999. | 394. | 97.7  | 0.01 | 0.28 |  |  |
| 1.00     | 5.19 | 65.   | 10.0  | 276.4  | 2.0    |       |      |       |      |      |  |  |
| 18 01 01 | 1 22 | -29.6 | 0.285 | -9.000 | -9.000 | -999. | 365. | 89.2  | 0.01 | 0.28 |  |  |
| 1.00     | 4.97 | 62.   | 10.0  | 276.4  | 2.0    |       |      |       |      |      |  |  |
| 18 01 01 | 1 23 | -31.5 | 0.303 | -9.000 | -9.000 | -999. | 400. | 100.8 | 0.01 | 0.28 |  |  |
| 1.00     | 5.27 | 61.   | 10.0  | 276.4  | 2.0    |       |      |       |      |      |  |  |
| 18 01 01 | 1 24 | -31.5 | 0.304 | -9.000 | -9.000 | -999. | 402. | 101.6 | 0.01 | 0.28 |  |  |
| 1.00     | 5.29 | 63.   | 10.0  | 277.0  | 2.0    |       |      |       |      |      |  |  |

First hour of profile data

| YR | MO | DY | HR | HEIGHT | F | WDIR | WSPD | AMB_TMP | sigmaA | sigmaW | sigmaV |
|----|----|----|----|--------|---|------|------|---------|--------|--------|--------|
| 18 | 01 | 01 | 01 | 10.0   | 1 | 67.  | 5.51 | 276.0   | 99.0   | -99.00 | -99.00 |

F indicates top of profile (=1) or below (=0)

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*

06/30/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*

\*\*\*

17:46:08

PAGE 4

\*\*\* MODELOPTs: CONC ELEV ARM2 RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM ANNUAL RESULTS

AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF NO2 IN MICROGRAMS/M\*\*3

\*\*

# NETWORK

| GROUP ID      | OF TYPE | GRID-ID | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |
|---------------|---------|---------|--------------|--------------------------|
| ZHILL, ZFLAG) |         |         |              |                          |

|       |                      |              |            |             |       |
|-------|----------------------|--------------|------------|-------------|-------|
| EG    | 1ST HIGHEST VALUE IS | 0.06538 AT ( | 430188.78, | 5202928.50, | 4.81, |
| 5.40, | 0.00) DC             |              |            |             |       |
|       | 2ND HIGHEST VALUE IS | 0.06525 AT ( | 430190.34, | 5202928.38, | 4.63, |
| 5.40, | 0.00) DC             |              |            |             |       |
|       | 3RD HIGHEST VALUE IS | 0.06494 AT ( | 430188.78, | 5202916.00, | 4.78, |
| 4.78, | 0.00) DC             |              |            |             |       |
|       | 4TH HIGHEST VALUE IS | 0.06473 AT ( | 430190.29, | 5202916.15, | 4.59, |
| 5.41, | 0.00) DC             |              |            |             |       |
|       | 5TH HIGHEST VALUE IS | 0.06460 AT ( | 430176.34, | 5202916.00, | 5.53, |

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| 5.53,  | 0.00) DC              | 0.06451 AT ( | 430190.40, | 5202940.60, | 4.77, |
| 5.44,  | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.06451 AT ( | 430188.78, | 5202941.00, | 4.95, |
| 4.95,  | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.06439 AT ( | 430176.34, | 5202928.50, | 5.54, |
| 5.54,  | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.06376 AT ( | 430176.34, | 5202903.50, | 5.56, |
| 5.56,  | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 0.06361 AT ( | 430188.78, | 5202903.50, | 4.79, |
| 4.79,  | 0.00) DC              |              |            |             |       |
| EP04   | 1ST HIGHEST VALUE IS  | 1.57095 AT ( | 430797.97, | 5203015.50, | 6.01, |
| 6.01,  | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 1.56370 AT ( | 430847.69, | 5203003.00, | 5.45, |
| 5.45,  | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 1.56369 AT ( | 430822.84, | 5203040.50, | 5.93, |
| 7.90,  | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 1.56297 AT ( | 430835.28, | 5202990.50, | 5.59, |
| 6.29,  | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 1.56098 AT ( | 430810.41, | 5203040.50, | 6.01, |
| 7.15,  | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 1.56090 AT ( | 430835.28, | 5203003.00, | 5.28, |
| 6.29,  | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 1.55841 AT ( | 430810.41, | 5203028.00, | 5.56, |
| 5.56,  | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 1.55794 AT ( | 430822.84, | 5203003.00, | 5.23, |
| 5.23,  | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 1.55726 AT ( | 430847.69, | 5202990.50, | 5.48, |
| 5.48,  | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 1.55258 AT ( | 430835.28, | 5203015.50, | 4.98, |
| 4.98,  | 0.00) DC              |              |            |             |       |
| EP08   | 1ST HIGHEST VALUE IS  | 0.06708 AT ( | 430192.23, | 5203029.44, | 4.28, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 0.06695 AT ( | 430191.48, | 5203021.69, | 4.36, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.06665 AT ( | 430190.73, | 5203013.94, | 4.44, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.06647 AT ( | 430188.78, | 5203028.00, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 0.06643 AT ( | 430188.78, | 5203015.50, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.06634 AT ( | 430192.87, | 5203041.83, | 4.23, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.06627 AT ( | 430188.78, | 5203040.50, | 4.68, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.06561 AT ( | 430193.52, | 5203054.23, | 4.25, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.06558 AT ( | 430188.78, | 5203003.00, | 4.68, |

|        |                       |    |         |      |            |             |
|--------|-----------------------|----|---------|------|------------|-------------|
| 92.43, | 0.00)                 | DC |         |      |            |             |
|        | 10TH HIGHEST VALUE IS |    | 0.06556 | AT ( | 430190.67, | 5203001.72, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.41,       |
| ALL    | 1ST HIGHEST VALUE IS  |    | 1.61463 | AT ( | 430797.97, | 5203015.50, |
| 6.01,  | 0.00)                 | DC |         |      |            | 6.01,       |
|        | 2ND HIGHEST VALUE IS  |    | 1.61196 | AT ( | 430822.84, | 5203040.50, |
| 7.90,  | 0.00)                 | DC |         |      |            | 5.93,       |
|        | 3RD HIGHEST VALUE IS  |    | 1.60944 | AT ( | 430847.69, | 5203003.00, |
| 5.45,  | 0.00)                 | DC |         |      |            | 5.45,       |
|        | 4TH HIGHEST VALUE IS  |    | 1.60842 | AT ( | 430810.41, | 5203040.50, |
| 7.15,  | 0.00)                 | DC |         |      |            | 6.01,       |
|        | 5TH HIGHEST VALUE IS  |    | 1.60645 | AT ( | 430835.28, | 5202990.50, |
| 6.29,  | 0.00)                 | DC |         |      |            | 5.59,       |
|        | 6TH HIGHEST VALUE IS  |    | 1.60599 | AT ( | 430835.28, | 5203003.00, |
| 6.29,  | 0.00)                 | DC |         |      |            | 5.28,       |
|        | 7TH HIGHEST VALUE IS  |    | 1.60476 | AT ( | 430810.41, | 5203028.00, |
| 5.56,  | 0.00)                 | DC |         |      |            | 5.56,       |
|        | 8TH HIGHEST VALUE IS  |    | 1.60218 | AT ( | 430822.84, | 5203003.00, |
| 5.23,  | 0.00)                 | DC |         |      |            | 5.23,       |
|        | 9TH HIGHEST VALUE IS  |    | 1.60148 | AT ( | 430847.69, | 5202990.50, |
| 5.48,  | 0.00)                 | DC |         |      |            | 5.48,       |
|        | 10TH HIGHEST VALUE IS |    | 1.59892 | AT ( | 430835.28, | 5203015.50, |
| 4.98,  | 0.00)                 | DC |         |      |            | 4.98,       |

\*\*\* RECEPTOR TYPES: GC = GRIDCART  
GP = GRIDPOLR  
DC = DISCCART  
DP = DISCPOLR

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
06/30/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*  
\*\*\* 17:46:08

PAGE 5

\*\*\* MODELOPTs: CONC ELEV ARM2 RURAL ADJ\_U\*

\*\*\* Message Summary : AERMOD Model Execution \*\*\*

----- Summary of Total Messages -----

|            |                              |
|------------|------------------------------|
| A Total of | 0 Fatal Error Message(s)     |
| A Total of | 2 Warning Message(s)         |
| A Total of | 758 Informational Message(s) |
| A Total of | 43824 Hours Were Processed   |
| A Total of | 398 Calm Hours Identified    |

A Total of 360 Missing Hours Identified ( 0.82 Percent)

\*\*\*\*\* FATAL ERROR MESSAGES \*\*\*\*\*  
\*\*\* NONE \*\*\*

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*  
SO W320 46 PPARM: Input Parameter May Be Out-of-Range for Parameter  
VS  
ME W187 11561 MEOPEN: ADJ\_U\* Option for Stable Low Winds used in AERMET

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*  
\*\*\* 04:30:18

PAGE 1

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* MODEL SETUP OPTIONS SUMMARY

\*\*\*

\*\* Model Options Selected:

- \* Model Allows User-Specified Options
- \* Model Is Setup For Calculation of Average CONCentration Values.
- \* NO GAS DEPOSITION Data Provided.
- \* NO PARTICLE DEPOSITION Data Provided.
- \* Model Uses NO DRY DEPLETION. DDPLETE = F
- \* Model Uses NO WET DEPLETION. WETDPLT = F
- \* Stack-tip Downwash.
- \* Model Accounts for ELEVated Terrain Effects.
- \* Use Calms Processing Routine.
- \* Use Missing Data Processing Routine.
- \* No Exponential Decay.
- \* Model Uses RURAL Dispersion Only.
- \* Option for Capped & Horiz Stacks Selected With:
  - 0 Capped Stack(s); and 3 Horizontal Stack(s)
- \* ADJ\_U\* - Use ADJ\_U\* option for SBL in AERMET
- \* CCVR\_Sub - Meteorological data includes CCVR substitutions
- \* TEMP\_Sub - Meteorological data includes TEMP substitutions
- \* Model Assumes No FLAGPOLE Receptor Heights.
- \* The User Specified a Pollutant Type of: PM-2.5

\*\*Note that special processing requirements apply for the 24-hour PM2.5 NAAQS -  
check available guidance.

Model will process user-specified ranks of high 24-hour values averaged across  
the number of years modeled, and

the multi-year average of individual ANNUAL values, averaged across the number of  
years modeled.

\*\*Model Calculates 1 Short Term Average(s) of: 24-HR

\*\*This Run Includes: 652 Source(s); 30 Source Group(s); and 11358  
Receptor(s)

with: 14 POINT(s), including  
0 POINTCAP(s) and 3 POINTHOR(s)  
and: 635 VOLUME source(s)

and: 3 AREA type source(s)  
and: 0 LINE source(s)  
and: 0 RLINE/RLINEXT source(s)  
and: 0 OPENPIT source(s)  
and: 0 BUOYANT LINE source(s) with a total of 0 line(s)  
and: 0 SWPOINT source(s)

\*\*Model Set To Continue RUNning After the Setup Testing.

\*\*The AERMET Input Meteorological Data Version Date: 22112

\*\*Output Options Selected:

Model Outputs Tables of Highest Short Term Values by Receptor (RECTABLE  
Keyword)  
Model Outputs External File(s) of High Values for Plotting (PLOTFILE  
Keyword)  
Model Outputs Separate Summary File of High Ranked Values (SUMMFILE  
Keyword)

\*\*NOTE: The Following Flags May Appear Following CONC Values: c for Calm Hours  
m for Missing Hours  
b for Both Calm and

Missing Hours

\*\*Misc. Inputs: Base Elev. for Pot. Temp. Profile (m MSL) = 5.50 ; Decay  
Coef. = 0.000 ; Rot. Angle = 0.0  
Emission Units = GRAMS/SEC ;  
Emission Rate Unit Factor = 0.10000E+07  
Output Units = MICROGRAMS/M\*\*3

\*\*Approximate Storage Requirements of Model = 56.5 MB of RAM.

\*\*Input Runstream File: aermod.inp

\*\*Output Print File: aermod.out

\*\*Detailed Error/Message File: HOQUIAMPROJECT\_PM2P5\_24HR.ERR

\*\*File for Summary of Results: HOQUIAMPROJECT\_PM2P5\_24HR.SUM

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*  
\*\*\* 04:30:18

PAGE 2

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*





Surface station no.: 94225  
Name: BOWERMAN AIRPORT

Upper air station no.: 72797  
Name: QUILLAYUTE

Year: 2018

|        |     |    |     |    |     |    |    |       |       |       |     |     |    |       |
|--------|-----|----|-----|----|-----|----|----|-------|-------|-------|-----|-----|----|-------|
| YR     | MO  | DY | JDY | HR | H0  | U* | W* | DT/DZ | ZICNV | ZIMCH | M-O | LEN | Z0 | BOWEN |
| ALBEDO | REF | WS | WD  | HT | REF | TA | HT |       |       |       |     |     |    |       |

|      |          |          |       |       |        |        |       |      |        |      |      |
|------|----------|----------|-------|-------|--------|--------|-------|------|--------|------|------|
| 1.00 | 18 01 01 | 1 01     | -33.0 | 0.317 | -9.000 | -9.000 | -999. | 429. | 110.6  | 0.01 | 0.28 |
|      |          | 5.51 67. | 10.0  | 275.9 | 2.0    |        |       |      |        |      |      |
| 1.00 | 18 01 01 | 1 02     | -42.0 | 0.403 | -9.000 | -9.000 | -999. | 614. | 178.7  | 0.07 | 0.28 |
|      |          | 5.10 51. | 10.0  | 275.3 | 2.0    |        |       |      |        |      |      |
| 1.00 | 18 01 01 | 1 03     | -42.5 | 0.408 | -9.000 | -9.000 | -999. | 625. | 183.1  | 0.07 | 0.28 |
|      |          | 5.16 54. | 10.0  | 275.3 | 2.0    |        |       |      |        |      |      |
| 1.00 | 18 01 01 | 1 04     | -35.4 | 0.339 | -9.000 | -9.000 | -999. | 477. | 126.4  | 0.07 | 0.28 |
|      |          | 4.32 50. | 10.0  | 275.3 | 2.0    |        |       |      |        |      |      |
| 1.00 | 18 01 01 | 1 05     | -35.2 | 0.337 | -9.000 | -9.000 | -999. | 469. | 124.6  | 0.07 | 0.28 |
|      |          | 4.29 58. | 10.0  | 274.8 | 2.0    |        |       |      |        |      |      |
| 1.00 | 18 01 01 | 1 06     | -36.6 | 0.350 | -9.000 | -9.000 | -999. | 498. | 135.1  | 0.07 | 0.28 |
|      |          | 4.46 50. | 10.0  | 274.8 | 2.0    |        |       |      |        |      |      |
| 0.58 | 18 01 01 | 1 07     | -32.7 | 0.340 | -9.000 | -9.000 | -999. | 475. | 126.8  | 0.07 | 0.28 |
|      |          | 4.32 51. | 10.0  | 274.8 | 2.0    |        |       |      |        |      |      |
| 0.35 | 18 01 01 | 1 08     | -0.5  | 0.283 | -9.000 | -9.000 | -999. | 363. | 4158.0 | 0.01 | 0.28 |
|      |          | 4.71 62. | 10.0  | 276.4 | 2.0    |        |       |      |        |      |      |
| 0.26 | 18 01 01 | 1 09     | 14.1  | 0.378 | 0.287  | 0.007  | 61.   | 558. | -351.0 | 0.01 | 0.28 |
|      |          | 6.19 68. | 10.0  | 277.5 | 2.0    |        |       |      |        |      |      |
| 0.22 | 18 01 01 | 1 10     | 23.1  | 0.354 | 0.427  | 0.008  | 123.  | 506. | -175.6 | 0.01 | 0.28 |
|      |          | 5.72 63. | 10.0  | 278.8 | 2.0    |        |       |      |        |      |      |
| 0.21 | 18 01 01 | 1 11     | 25.3  | 0.448 | 0.480  | 0.010  | 160.  | 720. | -325.6 | 0.01 | 0.28 |
|      |          | 7.33 72. | 10.0  | 279.2 | 2.0    |        |       |      |        |      |      |
| 0.23 | 18 01 01 | 1 12     | 20.7  | 0.394 | 0.464  | 0.008  | 176.  | 597. | -270.7 | 0.01 | 0.28 |
|      |          | 6.43 65. | 10.0  | 280.3 | 2.0    |        |       |      |        |      |      |
| 0.28 | 18 01 01 | 1 13     | 9.6   | 0.397 | 0.365  | 0.008  | 184.  | 599. | -591.9 | 0.01 | 0.28 |
|      |          | 6.53 73. | 10.0  | 280.3 | 2.0    |        |       |      |        |      |      |
| 0.41 | 18 01 01 | 1 14     | -19.9 | 0.452 | -9.000 | -9.000 | -999. | 729. | 426.1  | 0.07 | 0.28 |
|      |          | 5.60 59. | 10.0  | 278.8 | 2.0    |        |       |      |        |      |      |
| 1.00 | 18 01 01 | 1 15     | -33.5 | 0.324 | -9.000 | -9.000 | -999. | 454. | 115.3  | 0.01 | 0.28 |
|      |          | 5.62 72. | 10.0  | 278.1 | 2.0    |        |       |      |        |      |      |
| 1.00 | 18 01 01 | 1 16     | -32.9 | 0.317 | -9.000 | -9.000 | -999. | 429. | 110.7  | 0.01 | 0.28 |
|      |          | 5.51 71. | 10.0  | 277.5 | 2.0    |        |       |      |        |      |      |
| 1.00 | 18 01 01 | 1 17     | -25.5 | 0.246 | -9.000 | -9.000 | -999. | 295. | 66.7   | 0.01 | 0.28 |
|      |          | 4.32 62. | 10.0  | 277.0 | 2.0    |        |       |      |        |      |      |
| 1.00 | 18 01 01 | 1 18     | -30.6 | 0.295 | -9.000 | -9.000 | -999. | 385. | 95.7   | 0.01 | 0.28 |
|      |          | 5.14 62. | 10.0  | 277.5 | 2.0    |        |       |      |        |      |      |
| 1.00 | 18 01 01 | 1 19     | -35.3 | 0.340 | -9.000 | -9.000 | -999. | 476. | 127.2  | 0.01 | 0.28 |
|      |          | 5.89 66. | 10.0  | 276.4 | 2.0    |        |       |      |        |      |      |

|          |      |       |       |        |        |       |      |       |      |      |
|----------|------|-------|-------|--------|--------|-------|------|-------|------|------|
| 18 01 01 | 1 20 | -39.1 | 0.376 | -9.000 | -9.000 | -999. | 552. | 155.2 | 0.01 | 0.28 |
| 1.00     | 6.48 | 67.   | 10.0  | 276.4  | 2.0    |       |      |       |      |      |
| 18 01 01 | 1 21 | -31.0 | 0.298 | -9.000 | -9.000 | -999. | 394. | 97.7  | 0.01 | 0.28 |
| 1.00     | 5.19 | 65.   | 10.0  | 276.4  | 2.0    |       |      |       |      |      |
| 18 01 01 | 1 22 | -29.6 | 0.285 | -9.000 | -9.000 | -999. | 365. | 89.2  | 0.01 | 0.28 |
| 1.00     | 4.97 | 62.   | 10.0  | 276.4  | 2.0    |       |      |       |      |      |
| 18 01 01 | 1 23 | -31.5 | 0.303 | -9.000 | -9.000 | -999. | 400. | 100.8 | 0.01 | 0.28 |
| 1.00     | 5.27 | 61.   | 10.0  | 276.4  | 2.0    |       |      |       |      |      |
| 18 01 01 | 1 24 | -31.5 | 0.304 | -9.000 | -9.000 | -999. | 402. | 101.6 | 0.01 | 0.28 |
| 1.00     | 5.29 | 63.   | 10.0  | 277.0  | 2.0    |       |      |       |      |      |

First hour of profile data

| YR | MO | DY | HR | HEIGHT | F | WDIR | WSPD | AMB_TMP | sigmaA | sigmaW | sigmaV |
|----|----|----|----|--------|---|------|------|---------|--------|--------|--------|
| 18 | 01 | 01 | 01 | 10.0   | 1 | 67.  | 5.51 | 276.0   | 99.0   | -99.00 | -99.00 |

F indicates top of profile (=1) or below (=0)

\*\*\* AERMOD - VERSION 22112 \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\*

04:30:18

PAGE 4

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 1ST-HIGHEST 24-HR RESULTS

AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID      | NETWORK              | AVERAGE CONC                        | RECEPTOR (XR, YR, ZELEV, |
|---------------|----------------------|-------------------------------------|--------------------------|
| ZHILL, ZFLAG) | OF TYPE GRID-ID      |                                     |                          |
| EG            | 1ST HIGHEST VALUE IS | 0.09475 AT ( 430188.78, 5202928.50, | 4.81,                    |
| 5.40,         | 0.00) DC             |                                     |                          |
|               | 2ND HIGHEST VALUE IS | 0.09469 AT ( 430190.34, 5202928.38, | 4.63,                    |
| 5.40,         | 0.00) DC             |                                     |                          |
|               | 3RD HIGHEST VALUE IS | 0.09340 AT ( 430206.98, 5202890.68, | 5.02,                    |
| 5.02,         | 0.00) DC             |                                     |                          |
|               | 4TH HIGHEST VALUE IS | 0.09281 AT ( 430176.34, 5202928.50, | 5.54,                    |
| 5.54,         | 0.00) DC             |                                     |                          |
|               | 5TH HIGHEST VALUE IS | 0.09277 AT ( 430215.23, 5202890.93, | 5.02,                    |
| 5.02,         | 0.00) DC             |                                     |                          |

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
|        | 6TH HIGHEST VALUE IS  | 0.09260 AT ( | 430190.40, | 5202940.60, | 4.77, |
| 5.44,  | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.09233 AT ( | 430198.73, | 5202890.43, | 4.91, |
| 4.91,  | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.09208 AT ( | 430188.78, | 5202941.00, | 4.95, |
| 4.95,  | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.09129 AT ( | 430176.34, | 5202916.00, | 5.53, |
| 5.53,  | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 0.09125 AT ( | 430176.34, | 5202878.50, | 5.62, |
| 5.62,  | 0.00) DC              |              |            |             |       |
| EP01   | 1ST HIGHEST VALUE IS  | 1.42291 AT ( | 430114.19, | 5203102.50, | 4.91, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 1.41982 AT ( | 430126.63, | 5203102.50, | 4.83, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 1.41702 AT ( | 430101.75, | 5203102.50, | 4.91, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 1.40943 AT ( | 430139.06, | 5203102.50, | 4.64, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 1.40797 AT ( | 430076.91, | 5203090.00, | 4.86, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 1.40634 AT ( | 430151.50, | 5203102.50, | 4.69, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 1.40490 AT ( | 430089.31, | 5203102.50, | 4.86, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 1.40433 AT ( | 430089.31, | 5203090.00, | 4.81, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 1.40009 AT ( | 430039.59, | 5203090.00, | 5.16, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 1.39910 AT ( | 430064.47, | 5203090.00, | 4.74, |
| 92.43, | 0.00) DC              |              |            |             |       |
| EP02   | 1ST HIGHEST VALUE IS  | 0.62783 AT ( | 430188.78, | 5203053.00, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 0.62691 AT ( | 430176.34, | 5203053.00, | 5.12, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.62325 AT ( | 430176.34, | 5203065.00, | 5.11, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.62297 AT ( | 430193.52, | 5203054.23, | 4.25, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 0.62217 AT ( | 430188.78, | 5203065.00, | 4.67, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.61225 AT ( | 430194.16, | 5203066.62, | 4.29, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.60778 AT ( | 430163.91, | 5203053.00, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.60488 AT ( | 430163.91, | 5203065.00, | 4.66, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.59857 AT ( | 430151.50, | 5203053.00, | 4.76, |
| 92.43, | 0.00) DC              |              |            |             |       |

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
|        | 10TH HIGHEST VALUE IS | 0.59697 AT ( | 430151.50, | 5203065.00, | 4.78, |
| 92.43, | 0.00) DC              |              |            |             |       |
| EP03   | 1ST HIGHEST VALUE IS  | 0.63589 AT ( | 430188.78, | 5203053.00, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 0.63245 AT ( | 430176.34, | 5203053.00, | 5.12, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.63243 AT ( | 430193.52, | 5203054.23, | 4.25, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.63120 AT ( | 430188.78, | 5203065.00, | 4.67, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 0.62933 AT ( | 430176.34, | 5203065.00, | 5.11, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.62357 AT ( | 430194.16, | 5203066.62, | 4.29, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.61226 AT ( | 430163.91, | 5203053.00, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.61066 AT ( | 430163.91, | 5203065.00, | 4.66, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.60225 AT ( | 430151.50, | 5203065.00, | 4.78, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 0.60176 AT ( | 430151.50, | 5203053.00, | 4.76, |
| 92.43, | 0.00) DC              |              |            |             |       |

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*

\*\*\* 04:30:18

PAGE 5

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 1ST-HIGHEST 24-HR RESULTS  
AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID              | NETWORK   | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |
|-----------------------|-----------|--------------|--------------------------|
| ZHILL, ZFLAG) OF TYPE | GRID-ID   |              |                          |
| - - - - -             | - - - - - | - - - - -    | - - - - -                |
| - - - - -             | - - - - - | - - - - -    | - - - - -                |

|        |                      |              |            |             |        |
|--------|----------------------|--------------|------------|-------------|--------|
| EP04   | 1ST HIGHEST VALUE IS | 6.75332 AT ( | 430164.06, | 5203787.50, | 68.49, |
| 92.43, | 0.00) DC             |              |            |             |        |
|        | 2ND HIGHEST VALUE IS | 6.72935 AT ( | 430487.69, | 5203812.50, | 72.07, |
| 92.43, | 0.00) DC             |              |            |             |        |

|        |                       |              |            |             |        |
|--------|-----------------------|--------------|------------|-------------|--------|
| 92.43, | 3RD HIGHEST VALUE IS  | 6.70881 AT ( | 430478.81, | 5203862.50, | 68.62, |
|        | 0.00) DC              |              |            |             |        |
| 92.43, | 4TH HIGHEST VALUE IS  | 6.68426 AT ( | 430512.56, | 5203812.50, | 62.27, |
|        | 0.00) DC              |              |            |             |        |
| 92.43, | 5TH HIGHEST VALUE IS  | 6.67497 AT ( | 430188.97, | 5203787.50, | 69.43, |
|        | 0.00) DC              |              |            |             |        |
| 92.43, | 6TH HIGHEST VALUE IS  | 6.63361 AT ( | 430437.91, | 5203787.50, | 65.49, |
|        | 0.00) DC              |              |            |             |        |
| 92.43, | 7TH HIGHEST VALUE IS  | 6.54664 AT ( | 430413.00, | 5203787.50, | 72.04, |
|        | 0.00) DC              |              |            |             |        |
| 92.43, | 8TH HIGHEST VALUE IS  | 6.47936 AT ( | 430528.06, | 5203862.50, | 71.41, |
|        | 0.00) DC              |              |            |             |        |
| 92.43, | 9TH HIGHEST VALUE IS  | 6.28126 AT ( | 430139.16, | 5203787.50, | 71.39, |
| 89.87, | 0.00) DC              |              |            |             |        |
| 92.43, | 10TH HIGHEST VALUE IS | 6.26582 AT ( | 430213.84, | 5203787.50, | 71.57, |
|        | 0.00) DC              |              |            |             |        |
| EP05   | 1ST HIGHEST VALUE IS  | 0.25337 AT ( | 430188.78, | 5203028.00, | 4.70,  |
| 92.43, | 0.00) DC              |              |            |             |        |
| 92.43, | 2ND HIGHEST VALUE IS  | 0.25277 AT ( | 430192.23, | 5203029.44, | 4.28,  |
|        | 0.00) DC              |              |            |             |        |
| 92.43, | 3RD HIGHEST VALUE IS  | 0.24862 AT ( | 430191.48, | 5203021.69, | 4.36,  |
|        | 0.00) DC              |              |            |             |        |
| 92.43, | 4TH HIGHEST VALUE IS  | 0.24495 AT ( | 430176.34, | 5203028.00, | 5.19,  |
|        | 0.00) DC              |              |            |             |        |
| 92.43, | 5TH HIGHEST VALUE IS  | 0.23863 AT ( | 430188.78, | 5203040.50, | 4.68,  |
|        | 0.00) DC              |              |            |             |        |
| 92.43, | 6TH HIGHEST VALUE IS  | 0.23643 AT ( | 430192.87, | 5203041.83, | 4.23,  |
|        | 0.00) DC              |              |            |             |        |
| 92.43, | 7TH HIGHEST VALUE IS  | 0.23604 AT ( | 430188.78, | 5203015.50, | 4.70,  |
|        | 0.00) DC              |              |            |             |        |
| 92.43, | 8TH HIGHEST VALUE IS  | 0.23373 AT ( | 430163.91, | 5203028.00, | 4.71,  |
|        | 0.00) DC              |              |            |             |        |
| 92.43, | 9TH HIGHEST VALUE IS  | 0.23144 AT ( | 430176.34, | 5203040.50, | 5.19,  |
|        | 0.00) DC              |              |            |             |        |
| 92.43, | 10TH HIGHEST VALUE IS | 0.23142 AT ( | 430190.73, | 5203013.94, | 4.44,  |
|        | 0.00) DC              |              |            |             |        |
| EP06   | 1ST HIGHEST VALUE IS  | 0.25042 AT ( | 430188.78, | 5203028.00, | 4.70,  |
| 92.43, | 0.00) DC              |              |            |             |        |
| 92.43, | 2ND HIGHEST VALUE IS  | 0.25038 AT ( | 430192.23, | 5203029.44, | 4.28,  |
|        | 0.00) DC              |              |            |             |        |
| 92.43, | 3RD HIGHEST VALUE IS  | 0.24595 AT ( | 430191.48, | 5203021.69, | 4.36,  |
|        | 0.00) DC              |              |            |             |        |
| 92.43, | 4TH HIGHEST VALUE IS  | 0.24219 AT ( | 430176.34, | 5203028.00, | 5.19,  |
|        | 0.00) DC              |              |            |             |        |
| 92.43, | 5TH HIGHEST VALUE IS  | 0.23613 AT ( | 430188.78, | 5203040.50, | 4.68,  |
|        | 0.00) DC              |              |            |             |        |
| 92.43, | 6TH HIGHEST VALUE IS  | 0.23456 AT ( | 430192.87, | 5203041.83, | 4.23,  |
|        | 0.00) DC              |              |            |             |        |

|        |                       |         |      |            |             |       |
|--------|-----------------------|---------|------|------------|-------------|-------|
| 92.43, | 7TH HIGHEST VALUE IS  | 0.23319 | AT ( | 430188.78, | 5203015.50, | 4.70, |
| 0.00)  | DC                    |         |      |            |             |       |
| 92.43, | 8TH HIGHEST VALUE IS  | 0.23133 | AT ( | 430163.91, | 5203028.00, | 4.71, |
| 0.00)  | DC                    |         |      |            |             |       |
| 92.43, | 9TH HIGHEST VALUE IS  | 0.22932 | AT ( | 430176.34, | 5203040.50, | 5.19, |
| 0.00)  | DC                    |         |      |            |             |       |
| 92.43, | 10TH HIGHEST VALUE IS | 0.22894 | AT ( | 430190.73, | 5203013.94, | 4.44, |
| 0.00)  | DC                    |         |      |            |             |       |
| EP08   | 1ST HIGHEST VALUE IS  | 2.56454 | AT ( | 430713.97, | 5203151.14, | 4.86, |
| 92.43, | 0.00)                 | DC      |      |            |             |       |
| 92.43, | 2ND HIGHEST VALUE IS  | 2.54750 | AT ( | 430714.00, | 5203163.34, | 4.79, |
| 0.00)  | DC                    |         |      |            |             |       |
| 92.43, | 3RD HIGHEST VALUE IS  | 2.28478 | AT ( | 430714.04, | 5203175.55, | 4.84, |
| 0.00)  | DC                    |         |      |            |             |       |
| 92.43, | 4TH HIGHEST VALUE IS  | 2.20948 | AT ( | 430713.94, | 5203138.94, | 4.91, |
| 0.00)  | DC                    |         |      |            |             |       |
| 92.43, | 5TH HIGHEST VALUE IS  | 2.15081 | AT ( | 430723.38, | 5203152.00, | 4.83, |
| 0.00)  | DC                    |         |      |            |             |       |
| 92.43, | 6TH HIGHEST VALUE IS  | 2.13717 | AT ( | 430194.80, | 5203079.01, | 4.42, |
| 0.00)  | DC                    |         |      |            |             |       |
| 92.43, | 7TH HIGHEST VALUE IS  | 2.13170 | AT ( | 430188.78, | 5203077.50, | 4.73, |
| 0.00)  | DC                    |         |      |            |             |       |
| 92.43, | 8TH HIGHEST VALUE IS  | 2.12860 | AT ( | 430194.16, | 5203066.62, | 4.29, |
| 0.00)  | DC                    |         |      |            |             |       |
| 92.43, | 9TH HIGHEST VALUE IS  | 2.11720 | AT ( | 430195.44, | 5203091.41, | 4.39, |
| 0.00)  | DC                    |         |      |            |             |       |
| 92.43, | 10TH HIGHEST VALUE IS | 2.11638 | AT ( | 430714.10, | 5203199.95, | 5.08, |
| 0.00)  | DC                    |         |      |            |             |       |

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*

07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*

\*\*\* 04:30:18

PAGE 6

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 1ST-HIGHEST 24-HR RESULTS  
AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID      | NETWORK | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |
|---------------|---------|--------------|--------------------------|
| ZHILL, ZFLAG) | OF TYPE | GRID-ID      |                          |
| -----         |         |              |                          |

- - - - -

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| EP09   | 1ST HIGHEST VALUE IS  | 0.41588 AT ( | 430731.77, | 5203037.94, | 5.11, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 0.41226 AT ( | 430724.77, | 5203047.94, | 5.10, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.40625 AT ( | 430717.77, | 5203057.94, | 5.11, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.40036 AT ( | 430744.02, | 5203016.94, | 5.14, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 0.39180 AT ( | 430723.38, | 5203053.00, | 5.09, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.38956 AT ( | 430735.81, | 5203040.50, | 5.09, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.38584 AT ( | 430738.77, | 5203027.94, | 5.10, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.38485 AT ( | 430748.25, | 5203015.50, | 5.09, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.37664 AT ( | 430749.27, | 5203005.94, | 5.13, |
| 5.13,  | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 0.37256 AT ( | 430715.77, | 5203067.94, | 5.15, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        |                       |              |            |             |       |
| EP10   | 1ST HIGHEST VALUE IS  | 2.16039 AT ( | 430713.77, | 5203077.94, | 5.23, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 2.12350 AT ( | 430715.77, | 5203067.94, | 5.15, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 2.04664 AT ( | 430713.80, | 5203090.14, | 5.09, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 2.04424 AT ( | 430713.84, | 5203102.34, | 5.03, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 1.98248 AT ( | 430713.87, | 5203114.54, | 4.99, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 1.96837 AT ( | 430723.38, | 5203090.00, | 5.16, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 1.94617 AT ( | 430723.38, | 5203077.50, | 5.13, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 1.93206 AT ( | 430723.38, | 5203102.50, | 5.18, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 1.84028 AT ( | 430713.90, | 5203126.74, | 4.97, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 1.82804 AT ( | 430717.77, | 5203057.94, | 5.11, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        |                       |              |            |             |       |
| EP11   | 1ST HIGHEST VALUE IS  | 1.78866 AT ( | 430713.77, | 5203077.94, | 5.23, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 1.78332 AT ( | 430713.84, | 5203102.34, | 5.03, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 1.77443 AT ( | 430713.87, | 5203114.54, | 4.99, |
| 92.43, | 0.00) DC              |              |            |             |       |



|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| 92.43, | 4TH HIGHEST VALUE IS  | 1.74694 AT ( | 430713.80, | 5203090.14, | 5.09, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 5TH HIGHEST VALUE IS  | 1.71837 AT ( | 430723.38, | 5203102.50, | 5.18, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 6TH HIGHEST VALUE IS  | 1.70945 AT ( | 430723.38, | 5203090.00, | 5.16, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 7TH HIGHEST VALUE IS  | 1.70894 AT ( | 430715.77, | 5203067.94, | 5.15, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 8TH HIGHEST VALUE IS  | 1.69040 AT ( | 430723.38, | 5203077.50, | 5.13, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 9TH HIGHEST VALUE IS  | 1.65225 AT ( | 430713.90, | 5203126.74, | 4.97, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 10TH HIGHEST VALUE IS | 1.63969 AT ( | 430723.38, | 5203115.00, | 5.09, |
|        | 0.00) DC              |              |            |             |       |
| EP12   | 1ST HIGHEST VALUE IS  | 0.71211 AT ( | 430717.77, | 5203057.94, | 5.11, |
| 92.43, | 0.00) DC              |              |            |             |       |
| 92.43, | 2ND HIGHEST VALUE IS  | 0.69571 AT ( | 430723.38, | 5203053.00, | 5.09, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 3RD HIGHEST VALUE IS  | 0.69148 AT ( | 430724.77, | 5203047.94, | 5.10, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 4TH HIGHEST VALUE IS  | 0.67898 AT ( | 430715.77, | 5203067.94, | 5.15, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 5TH HIGHEST VALUE IS  | 0.66856 AT ( | 430723.38, | 5203065.00, | 5.01, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 6TH HIGHEST VALUE IS  | 0.64041 AT ( | 430797.97, | 5203077.50, | 6.14, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 7TH HIGHEST VALUE IS  | 0.63881 AT ( | 430713.87, | 5203114.54, | 4.99, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 8TH HIGHEST VALUE IS  | 0.63763 AT ( | 430810.41, | 5203077.50, | 6.36, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 9TH HIGHEST VALUE IS  | 0.63408 AT ( | 430723.38, | 5203115.00, | 5.09, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 10TH HIGHEST VALUE IS | 0.63352 AT ( | 430785.53, | 5203077.50, | 6.08, |
|        | 0.00) DC              |              |            |             |       |

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*

07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*

\*\*\*

04:30:18

PAGE 7

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 1ST-HIGHEST 24-HR RESULTS  
AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID                      | NETWORK               | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV,     |
|-------------------------------|-----------------------|--------------|------------------------------|
| ZHILL, ZFLAG) OF TYPE GRID-ID |                       |              |                              |
| EP13                          | 1ST HIGHEST VALUE IS  | 2.23627 AT ( | 430713.84, 5203102.34, 5.03, |
| 92.43,                        | 0.00) DC              |              |                              |
|                               | 2ND HIGHEST VALUE IS  | 2.18095 AT ( | 430713.80, 5203090.14, 5.09, |
| 92.43,                        | 0.00) DC              |              |                              |
|                               | 3RD HIGHEST VALUE IS  | 2.17966 AT ( | 430713.87, 5203114.54, 4.99, |
| 92.43,                        | 0.00) DC              |              |                              |
|                               | 4TH HIGHEST VALUE IS  | 2.15965 AT ( | 430713.77, 5203077.94, 5.23, |
| 92.43,                        | 0.00) DC              |              |                              |
|                               | 5TH HIGHEST VALUE IS  | 2.13463 AT ( | 430715.77, 5203067.94, 5.15, |
| 92.43,                        | 0.00) DC              |              |                              |
|                               | 6TH HIGHEST VALUE IS  | 2.10683 AT ( | 430723.38, 5203102.50, 5.18, |
| 92.43,                        | 0.00) DC              |              |                              |
|                               | 7TH HIGHEST VALUE IS  | 2.06483 AT ( | 430713.90, 5203126.74, 4.97, |
| 92.43,                        | 0.00) DC              |              |                              |
|                               | 8TH HIGHEST VALUE IS  | 2.05268 AT ( | 430723.38, 5203090.00, 5.16, |
| 92.43,                        | 0.00) DC              |              |                              |
|                               | 9TH HIGHEST VALUE IS  | 2.01772 AT ( | 430713.94, 5203138.94, 4.91, |
| 92.43,                        | 0.00) DC              |              |                              |
|                               | 10TH HIGHEST VALUE IS | 2.00088 AT ( | 430723.38, 5203115.00, 5.09, |
| 92.43,                        | 0.00) DC              |              |                              |
| EP14                          | 1ST HIGHEST VALUE IS  | 1.93031 AT ( | 430713.87, 5203114.54, 4.99, |
| 92.43,                        | 0.00) DC              |              |                              |
|                               | 2ND HIGHEST VALUE IS  | 1.91990 AT ( | 430713.84, 5203102.34, 5.03, |
| 92.43,                        | 0.00) DC              |              |                              |
|                               | 3RD HIGHEST VALUE IS  | 1.84456 AT ( | 430713.90, 5203126.74, 4.97, |
| 92.43,                        | 0.00) DC              |              |                              |
|                               | 4TH HIGHEST VALUE IS  | 1.82434 AT ( | 430723.38, 5203102.50, 5.18, |
| 92.43,                        | 0.00) DC              |              |                              |
|                               | 5TH HIGHEST VALUE IS  | 1.82307 AT ( | 430713.80, 5203090.14, 5.09, |
| 92.43,                        | 0.00) DC              |              |                              |
|                               | 6TH HIGHEST VALUE IS  | 1.77850 AT ( | 430723.38, 5203115.00, 5.09, |
| 92.43,                        | 0.00) DC              |              |                              |
|                               | 7TH HIGHEST VALUE IS  | 1.77569 AT ( | 430713.94, 5203138.94, 4.91, |
| 92.43,                        | 0.00) DC              |              |                              |
|                               | 8TH HIGHEST VALUE IS  | 1.76625 AT ( | 430723.38, 5203090.00, 5.16, |
| 92.43,                        | 0.00) DC              |              |                              |
|                               | 9TH HIGHEST VALUE IS  | 1.71151 AT ( | 430713.77, 5203077.94, 5.23, |
| 92.43,                        | 0.00) DC              |              |                              |
|                               | 10TH HIGHEST VALUE IS | 1.69107 AT ( | 430723.38, 5203127.50, 5.09, |
| 92.43,                        | 0.00) DC              |              |                              |

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| FEL_P1 | 1ST HIGHEST VALUE IS  | 3.42478 AT ( | 430198.02, | 5203140.98, | 4.33, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 3.33586 AT ( | 430188.78, | 5203140.00, | 4.72, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 3.33391 AT ( | 430197.37, | 5203128.59, | 4.30, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 3.23135 AT ( | 430198.66, | 5203153.38, | 4.42, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 3.22348 AT ( | 430188.78, | 5203127.50, | 4.71, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 3.16589 AT ( | 430188.78, | 5203152.00, | 4.73, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 3.14830 AT ( | 430176.34, | 5203140.00, | 4.88, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 3.03702 AT ( | 430176.34, | 5203127.50, | 4.91, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 3.00728 AT ( | 430196.73, | 5203116.20, | 4.25, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 2.99991 AT ( | 430176.34, | 5203152.00, | 4.84, |
| 92.43, | 0.00) DC              |              |            |             |       |

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| FEL_P2 | 1ST HIGHEST VALUE IS  | 1.80031 AT ( | 430194.16, | 5203066.62, | 4.29, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 1.79105 AT ( | 430188.78, | 5203065.00, | 4.67, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 1.75801 AT ( | 430193.52, | 5203054.23, | 4.25, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 1.73358 AT ( | 430188.78, | 5203053.00, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 1.69876 AT ( | 430176.34, | 5203065.00, | 5.11, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 1.64768 AT ( | 430188.78, | 5203077.50, | 4.73, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 1.64322 AT ( | 430194.80, | 5203079.01, | 4.42, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 1.63658 AT ( | 430176.34, | 5203053.00, | 5.12, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 1.59878 AT ( | 430188.78, | 5203028.00, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 1.59538 AT ( | 430191.48, | 5203021.69, | 4.36, |
| 92.43, | 0.00) DC              |              |            |             |       |

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*

\*\*\* 04:30:18

PAGE 8

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 1ST-HIGHEST 24-HR RESULTS  
 AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3  
 \*\*

| GROUP ID      |                       | NETWORK | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |             |       |
|---------------|-----------------------|---------|--------------|--------------------------|-------------|-------|
| ZHILL, ZFLAG) | OF TYPE               | GRID-ID |              |                          |             |       |
| -----         |                       |         |              |                          |             |       |
| -----         |                       |         |              |                          |             |       |
| FEL_P3        | 1ST HIGHEST VALUE IS  |         | 1.42170 AT ( | 430190.62,               | 5202989.49, | 4.43, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 2ND HIGHEST VALUE IS  |         | 1.41700 AT ( | 430188.78,               | 5202990.50, | 4.68, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 3RD HIGHEST VALUE IS  |         | 1.37912 AT ( | 430188.78,               | 5202978.00, | 4.73, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 4TH HIGHEST VALUE IS  |         | 1.37244 AT ( | 430190.56,               | 5202977.27, | 4.52, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 5TH HIGHEST VALUE IS  |         | 1.34875 AT ( | 430176.34,               | 5202990.50, | 5.33, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 6TH HIGHEST VALUE IS  |         | 1.33889 AT ( | 430190.45,               | 5202952.82, | 5.21, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 7TH HIGHEST VALUE IS  |         | 1.32181 AT ( | 430188.78,               | 5202953.50, | 5.22, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 8TH HIGHEST VALUE IS  |         | 1.30581 AT ( | 430176.34,               | 5202978.00, | 5.39, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 9TH HIGHEST VALUE IS  |         | 1.27304 AT ( | 430188.78,               | 5202941.00, | 4.95, |
| 4.95,         | 0.00) DC              |         |              |                          |             |       |
|               | 10TH HIGHEST VALUE IS |         | 1.27074 AT ( | 430190.40,               | 5202940.60, | 4.77, |
| 5.44,         | 0.00) DC              |         |              |                          |             |       |
| LOAD_P        | 1ST HIGHEST VALUE IS  |         | 0.03007 AT ( | 430196.09,               | 5203103.80, | 4.32, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 2ND HIGHEST VALUE IS  |         | 0.02954 AT ( | 430195.44,               | 5203091.41, | 4.39, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 3RD HIGHEST VALUE IS  |         | 0.02947 AT ( | 430188.78,               | 5203102.50, | 4.73, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 4TH HIGHEST VALUE IS  |         | 0.02863 AT ( | 430188.78,               | 5203090.00, | 4.72, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 5TH HIGHEST VALUE IS  |         | 0.02819 AT ( | 430176.34,               | 5203102.50, | 5.00, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 6TH HIGHEST VALUE IS  |         | 0.02803 AT ( | 430196.73,               | 5203116.20, | 4.25, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 7TH HIGHEST VALUE IS  |         | 0.02799 AT ( | 430194.80,               | 5203079.01, | 4.42, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 8TH HIGHEST VALUE IS  |         | 0.02776 AT ( | 430188.78,               | 5203115.00, | 4.70, |

|        |                       |    |         |      |            |             |
|--------|-----------------------|----|---------|------|------------|-------------|
| 92.43, | 0.00)                 | DC |         |      |            |             |
|        | 9TH HIGHEST VALUE IS  |    | 0.02760 | AT ( | 430190.73, | 5203013.94, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.44,       |
|        | 10TH HIGHEST VALUE IS |    | 0.02747 | AT ( | 430191.48, | 5203021.69, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.36,       |
| PILE1  | 1ST HIGHEST VALUE IS  |    | 4.35930 | AT ( | 430199.30, | 5203165.77, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.48,       |
|        | 2ND HIGHEST VALUE IS  |    | 4.26810 | AT ( | 430199.94, | 5203178.16, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.29,       |
|        | 3RD HIGHEST VALUE IS  |    | 4.09833 | AT ( | 430188.78, | 5203177.00, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.70,       |
|        | 4TH HIGHEST VALUE IS  |    | 4.05627 | AT ( | 430198.66, | 5203153.38, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.42,       |
|        | 5TH HIGHEST VALUE IS  |    | 4.03760 | AT ( | 430188.78, | 5203164.50, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.71,       |
|        | 6TH HIGHEST VALUE IS  |    | 3.96906 | AT ( | 430198.02, | 5203140.98, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.33,       |
|        | 7TH HIGHEST VALUE IS  |    | 3.80717 | AT ( | 430188.78, | 5203152.00, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.73,       |
|        | 8TH HIGHEST VALUE IS  |    | 3.79693 | AT ( | 430188.78, | 5203140.00, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.72,       |
|        | 9TH HIGHEST VALUE IS  |    | 3.74299 | AT ( | 430176.34, | 5203177.00, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.73,       |
|        | 10TH HIGHEST VALUE IS |    | 3.72007 | AT ( | 430200.59, | 5203190.56, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.44,       |
| PILE2  | 1ST HIGHEST VALUE IS  |    | 5.10956 | AT ( | 430188.78, | 5203040.50, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.68,       |
|        | 2ND HIGHEST VALUE IS  |    | 5.02981 | AT ( | 430192.87, | 5203041.83, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.23,       |
|        | 3RD HIGHEST VALUE IS  |    | 4.80746 | AT ( | 430188.78, | 5203028.00, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.70,       |
|        | 4TH HIGHEST VALUE IS  |    | 4.79438 | AT ( | 430191.48, | 5203021.69, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.36,       |
|        | 5TH HIGHEST VALUE IS  |    | 4.79382 | AT ( | 430176.34, | 5203040.50, |
| 92.43, | 0.00)                 | DC |         |      |            | 5.19,       |
|        | 6TH HIGHEST VALUE IS  |    | 4.79287 | AT ( | 430192.23, | 5203029.44, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.28,       |
|        | 7TH HIGHEST VALUE IS  |    | 4.78519 | AT ( | 430188.78, | 5203053.00, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.70,       |
|        | 8TH HIGHEST VALUE IS  |    | 4.73628 | AT ( | 430188.78, | 5203015.50, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.70,       |
|        | 9TH HIGHEST VALUE IS  |    | 4.65726 | AT ( | 430190.73, | 5203013.94, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.44,       |
|        | 10TH HIGHEST VALUE IS |    | 4.63780 | AT ( | 430193.52, | 5203054.23, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.25,       |

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*

07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\*  
\*\*\* 04:30:18

PAGE 9  
\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 1ST-HIGHEST 24-HR RESULTS  
AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3  
\*\*

| GROUP ID              | NETWORK               | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV,     |
|-----------------------|-----------------------|--------------|------------------------------|
| ZHILL, ZFLAG) OF TYPE | GRID-ID               |              |                              |
| - - - - -             | - - - - -             | - - - - -    | - - - - -                    |
| - - - - -             | - - - - -             | - - - - -    | - - - - -                    |
| PILE3                 | 1ST HIGHEST VALUE IS  | 5.02034 AT ( | 430190.45, 5202952.82, 5.21, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 2ND HIGHEST VALUE IS  | 4.95938 AT ( | 430188.78, 5202953.50, 5.22, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 3RD HIGHEST VALUE IS  | 4.58142 AT ( | 430190.40, 5202940.60, 4.77, |
| 5.44,                 | 0.00) DC              |              |                              |
|                       | 4TH HIGHEST VALUE IS  | 4.57245 AT ( | 430188.78, 5202941.00, 4.95, |
| 4.95,                 | 0.00) DC              |              |                              |
|                       | 5TH HIGHEST VALUE IS  | 4.56445 AT ( | 430188.78, 5202965.50, 4.77, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 6TH HIGHEST VALUE IS  | 4.54972 AT ( | 430190.51, 5202965.05, 4.56, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 7TH HIGHEST VALUE IS  | 4.52832 AT ( | 430176.34, 5202953.50, 5.50, |
| 5.50,                 | 0.00) DC              |              |                              |
|                       | 8TH HIGHEST VALUE IS  | 4.49693 AT ( | 430188.78, 5202928.50, 4.81, |
| 5.40,                 | 0.00) DC              |              |                              |
|                       | 9TH HIGHEST VALUE IS  | 4.47983 AT ( | 430190.34, 5202928.38, 4.63, |
| 5.40,                 | 0.00) DC              |              |                              |
|                       | 10TH HIGHEST VALUE IS | 4.39413 AT ( | 430176.34, 5202965.50, 5.47, |
| 92.43,                | 0.00) DC              |              |                              |
| T_P                   | 1ST HIGHEST VALUE IS  | 0.24057 AT ( | 430401.24, 5202869.68, 5.67, |
| 5.67,                 | 0.00) DC              |              |                              |
|                       | 2ND HIGHEST VALUE IS  | 0.22987 AT ( | 430400.13, 5202866.50, 5.93, |
| 5.93,                 | 0.00) DC              |              |                              |
|                       | 3RD HIGHEST VALUE IS  | 0.21417 AT ( | 430389.49, 5202871.55, 5.49, |
| 5.49,                 | 0.00) DC              |              |                              |
|                       | 4TH HIGHEST VALUE IS  | 0.20363 AT ( | 430387.69, 5202866.50, 5.92, |
| 5.92,                 | 0.00) DC              |              |                              |
|                       | 5TH HIGHEST VALUE IS  | 0.18926 AT ( | 430377.74, 5202873.43, 5.40, |

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| 5.40,  | 0.00) DC              | 0.17910 AT ( | 430371.74, | 5202875.68, | 5.23, |
| 5.23,  | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.17670 AT ( | 430375.28, | 5202866.50, | 5.91, |
| 5.91,  | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.17203 AT ( | 430412.99, | 5202867.80, | 5.95, |
| 5.95,  | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.17075 AT ( | 430365.74, | 5202877.93, | 5.16, |
| 5.16,  | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.16431 AT ( | 430424.74, | 5202865.93, | 6.02, |
| 6.02,  | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS |              |            |             |       |
| T_P1   | 1ST HIGHEST VALUE IS  | 1.23784 AT ( | 430196.73, | 5203116.20, | 4.25, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 1.15522 AT ( | 430188.78, | 5203115.00, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 1.13642 AT ( | 430196.09, | 5203103.80, | 4.32, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 1.10912 AT ( | 430188.78, | 5203102.50, | 4.73, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 1.06487 AT ( | 430190.34, | 5202928.38, | 4.63, |
| 5.40,  | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 1.06439 AT ( | 430188.78, | 5202928.50, | 4.81, |
| 5.40,  | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 1.04465 AT ( | 430424.74, | 5202865.93, | 6.02, |
| 6.02,  | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 1.04202 AT ( | 430401.24, | 5202869.68, | 5.67, |
| 5.67,  | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 1.02040 AT ( | 430188.78, | 5203127.50, | 4.71, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 1.01500 AT ( | 430195.44, | 5203091.41, | 4.39, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        |                       |              |            |             |       |
| T_P1EX | 1ST HIGHEST VALUE IS  | 0.97541 AT ( | 430210.43, | 5203290.86, | 4.37, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 0.88032 AT ( | 430201.22, | 5203289.00, | 3.87, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.83009 AT ( | 430204.83, | 5203219.25, | 4.33, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.82776 AT ( | 430204.93, | 5203229.55, | 4.37, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 0.79792 AT ( | 430201.22, | 5203227.00, | 4.18, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.79226 AT ( | 430188.78, | 5203289.00, | 5.02, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.77996 AT ( | 430204.73, | 5203208.95, | 4.43, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.77204 AT ( | 430201.22, | 5203214.50, | 4.09, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.76818 AT ( | 430205.03, | 5203239.85, | 4.31, |



92.43, 0.00) DC  
 10TH HIGHEST VALUE IS 0.76746 AT ( 430201.22, 5203301.50, 3.49,  
 92.43, 0.00) DC

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
 07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*  
 \*\*\* 04:30:18

PAGE 10

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 1ST-HIGHEST 24-HR RESULTS  
 AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID      | NETWORK         | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |
|---------------|-----------------|--------------|--------------------------|
| ZHILL, ZFLAG) | OF TYPE GRID-ID |              |                          |
| - - - - -     | - - - - -       | - - - - -    | - - - - -                |
| - - - - -     | - - - - -       | - - - - -    | - - - - -                |

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| T_P2   | 1ST HIGHEST VALUE IS  | 0.68451 AT ( | 430194.80, | 5203079.01, | 4.42, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 0.64230 AT ( | 430188.78, | 5203077.50, | 4.73, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.62125 AT ( | 430194.16, | 5203066.62, | 4.29, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.61060 AT ( | 430188.78, | 5203065.00, | 4.67, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 0.59962 AT ( | 430188.78, | 5203090.00, | 4.72, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.58675 AT ( | 430188.78, | 5202928.50, | 4.81, |
| 5.40,  | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.58641 AT ( | 430190.34, | 5202928.38, | 4.63, |
| 5.40,  | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.57568 AT ( | 430195.44, | 5203091.41, | 4.39, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.57421 AT ( | 430424.74, | 5202865.93, | 6.02, |
| 6.02,  | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 0.57408 AT ( | 430401.24, | 5202869.68, | 5.67, |
| 5.67,  | 0.00) DC              |              |            |             |       |

|        |                      |              |            |             |       |
|--------|----------------------|--------------|------------|-------------|-------|
| T_P2EX | 1ST HIGHEST VALUE IS | 0.51287 AT ( | 430210.43, | 5203290.86, | 4.37, |
| 92.43, | 0.00) DC             |              |            |             |       |
|        | 2ND HIGHEST VALUE IS | 0.49558 AT ( | 430201.22, | 5203289.00, | 3.87, |

|        |                      |              |            |             |       |
|--------|----------------------|--------------|------------|-------------|-------|
| 92.43, | 0.00) DC             | 0.45404 AT ( | 430204.83, | 5203219.25, | 4.33, |
| 92.43, | 0.00) DC             | 0.45323 AT ( | 430204.93, | 5203229.55, | 4.37, |
| 92.43, | 0.00) DC             | 0.44920 AT ( | 430188.78, | 5203301.50, | 5.13, |
| 92.43, | 0.00) DC             | 0.44741 AT ( | 430188.78, | 5203289.00, | 5.02, |
| 92.43, | 0.00) DC             | 0.43688 AT ( | 430201.22, | 5203227.00, | 4.18, |
| 92.43, | 0.00) DC             | 0.42705 AT ( | 430204.73, | 5203208.95, | 4.43, |
| 92.43, | 0.00) DC             | 0.42247 AT ( | 430201.22, | 5203214.50, | 4.09, |
| 92.43, | 0.00) DC             | 0.42223 AT ( | 430205.03, | 5203239.85, | 4.31, |
| 92.43, | 0.00) DC             |              |            |             |       |
| T_P3   | 1ST HIGHEST VALUE IS | 0.66016 AT ( | 430190.67, | 5203001.72, | 4.41, |
| 92.43, | 0.00) DC             | 0.64062 AT ( | 430188.78, | 5203003.00, | 4.68, |
| 92.43, | 0.00) DC             | 0.59308 AT ( | 430188.78, | 5202990.50, | 4.68, |
| 92.43, | 0.00) DC             | 0.58475 AT ( | 430190.62, | 5202989.49, | 4.43, |
| 92.43, | 0.00) DC             | 0.57634 AT ( | 430176.34, | 5203003.00, | 5.28, |
| 92.43, | 0.00) DC             | 0.54581 AT ( | 430176.34, | 5202990.50, | 5.33, |
| 92.43, | 0.00) DC             | 0.50462 AT ( | 430188.78, | 5202978.00, | 4.73, |
| 92.43, | 0.00) DC             | 0.49290 AT ( | 430190.56, | 5202977.27, | 4.52, |
| 92.43, | 0.00) DC             | 0.49098 AT ( | 430176.34, | 5202978.00, | 5.39, |
| 92.43, | 0.00) DC             | 0.48422 AT ( | 430163.91, | 5203003.00, | 4.99, |
| 92.43, | 0.00) DC             |              |            |             |       |
| T_P3EX | 1ST HIGHEST VALUE IS | 0.40509 AT ( | 430210.43, | 5203290.86, | 4.37, |
| 92.43, | 0.00) DC             | 0.37244 AT ( | 430201.22, | 5203289.00, | 3.87, |
| 92.43, | 0.00) DC             | 0.36127 AT ( | 430204.83, | 5203219.25, | 4.33, |
| 92.43, | 0.00) DC             | 0.36097 AT ( | 430204.93, | 5203229.55, | 4.37, |
| 92.43, | 0.00) DC             | 0.34775 AT ( | 430201.22, | 5203227.00, | 4.18, |
| 92.43, | 0.00) DC             | 0.33965 AT ( | 430204.73, | 5203208.95, | 4.43, |

92.43, 0.00) DC  
 7TH HIGHEST VALUE IS 0.33736 AT ( 430205.03, 5203239.85, 4.31,  
 92.43, 0.00) DC  
 8TH HIGHEST VALUE IS 0.33598 AT ( 430201.22, 5203214.50, 4.09,  
 92.43, 0.00) DC  
 9TH HIGHEST VALUE IS 0.33558 AT ( 430188.78, 5203289.00, 5.02,  
 92.43, 0.00) DC  
 10TH HIGHEST VALUE IS 0.32415 AT ( 430188.78, 5203214.50, 4.72,  
 92.43, 0.00) DC

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
 07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*  
 \*\*\* 04:30:18

PAGE 11

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 1ST-HIGHEST 24-HR RESULTS  
 AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID              | NETWORK   | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |
|-----------------------|-----------|--------------|--------------------------|
| ZHILL, ZFLAG) OF TYPE | GRID-ID   |              |                          |
| - - - - -             | - - - - - | - - - - -    | - - - - -                |
| - - - - -             | - - - - - | - - - - -    | - - - - -                |

|        |                      |              |            |             |       |
|--------|----------------------|--------------|------------|-------------|-------|
| T_PEX  | 1ST HIGHEST VALUE IS | 0.66255 AT ( | 430210.43, | 5203290.86, | 4.37, |
| 92.43, | 0.00) DC             |              |            |             |       |
|        | 2ND HIGHEST VALUE IS | 0.59648 AT ( | 430201.22, | 5203289.00, | 3.87, |
| 92.43, | 0.00) DC             |              |            |             |       |
|        | 3RD HIGHEST VALUE IS | 0.52093 AT ( | 430188.78, | 5203289.00, | 5.02, |
| 92.43, | 0.00) DC             |              |            |             |       |
|        | 4TH HIGHEST VALUE IS | 0.52059 AT ( | 430201.22, | 5203301.50, | 3.49, |
| 92.43, | 0.00) DC             |              |            |             |       |
|        | 5TH HIGHEST VALUE IS | 0.49992 AT ( | 430210.13, | 5203302.26, | 3.15, |
| 92.43, | 0.00) DC             |              |            |             |       |
|        | 6TH HIGHEST VALUE IS | 0.49831 AT ( | 430188.78, | 5203301.50, | 5.13, |
| 92.43, | 0.00) DC             |              |            |             |       |
|        | 7TH HIGHEST VALUE IS | 0.47682 AT ( | 430210.73, | 5203279.46, | 4.32, |
| 92.43, | 0.00) DC             |              |            |             |       |
|        | 8TH HIGHEST VALUE IS | 0.44793 AT ( | 430176.34, | 5203289.00, | 4.43, |
| 92.43, | 0.00) DC             |              |            |             |       |
|        | 9TH HIGHEST VALUE IS | 0.44015 AT ( | 430176.34, | 5203301.50, | 4.99, |
| 92.43, | 0.00) DC             |              |            |             |       |

10TH HIGHEST VALUE IS 0.42396 AT ( 430201.22, 5203276.50, 3.94,  
92.43, 0.00) DC

ALL 1ST HIGHEST VALUE IS 14.86394 AT ( 430188.78, 5203053.00, 4.70,  
92.43, 0.00) DC  
2ND HIGHEST VALUE IS 14.66255 AT ( 430193.52, 5203054.23, 4.25,  
92.43, 0.00) DC  
3RD HIGHEST VALUE IS 14.56175 AT ( 430176.34, 5203053.00, 5.12,  
92.43, 0.00) DC  
4TH HIGHEST VALUE IS 14.53223 AT ( 430188.78, 5203040.50, 4.68,  
92.43, 0.00) DC  
5TH HIGHEST VALUE IS 14.39953 AT ( 430192.87, 5203041.83, 4.23,  
92.43, 0.00) DC  
6TH HIGHEST VALUE IS 14.25461 AT ( 430176.34, 5203040.50, 5.19,  
92.43, 0.00) DC  
7TH HIGHEST VALUE IS 14.22765 AT ( 430188.78, 5203028.00, 4.70,  
92.43, 0.00) DC  
8TH HIGHEST VALUE IS 14.22415 AT ( 430188.78, 5203065.00, 4.67,  
92.43, 0.00) DC  
9TH HIGHEST VALUE IS 14.17366 AT ( 430188.78, 5203015.50, 4.70,  
92.43, 0.00) DC  
10TH HIGHEST VALUE IS 14.10201 AT ( 430192.23, 5203029.44, 4.28,  
92.43, 0.00) DC

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*  
\*\*\* 04:30:18

PAGE 12

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 6TH-HIGHEST 24-HR RESULTS  
AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID      | NETWORK         | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |
|---------------|-----------------|--------------|--------------------------|
| ZHILL, ZFLAG) | OF TYPE GRID-ID |              |                          |
| - - - - -     | - - - - -       | - - - - -    | - - - - -                |
| - - - - -     | - - - - -       | - - - - -    | - - - - -                |

EG 1ST HIGHEST VALUE IS 0.06797 AT ( 430188.78, 5202903.50, 4.79,  
4.79, 0.00) DC  
2ND HIGHEST VALUE IS 0.06778 AT ( 430190.23, 5202903.93, 4.63,  
4.63, 0.00) DC

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
|        | 3RD HIGHEST VALUE IS  | 0.06746 AT ( | 430188.78, | 5202928.50, | 4.81, |
| 5.40,  | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.06733 AT ( | 430190.34, | 5202928.38, | 4.63, |
| 5.40,  | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 0.06684 AT ( | 430188.78, | 5202916.00, | 4.78, |
| 4.78,  | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.06681 AT ( | 430176.34, | 5202903.50, | 5.56, |
| 5.56,  | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.06675 AT ( | 430190.29, | 5202916.15, | 4.59, |
| 5.41,  | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.06627 AT ( | 430176.34, | 5202928.50, | 5.54, |
| 5.54,  | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.06599 AT ( | 430206.98, | 5202890.68, | 5.02, |
| 5.02,  | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 0.06581 AT ( | 430198.73, | 5202890.43, | 4.91, |
| 4.91,  | 0.00) DC              |              |            |             |       |
| EP01   | 1ST HIGHEST VALUE IS  | 1.06734 AT ( | 430176.34, | 5203065.00, | 5.11, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 1.06734 AT ( | 430114.19, | 5203065.00, | 4.73, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 1.06729 AT ( | 430126.63, | 5203065.00, | 4.72, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 1.06552 AT ( | 430151.50, | 5203065.00, | 4.78, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 1.06130 AT ( | 430101.75, | 5203065.00, | 4.74, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 1.06125 AT ( | 430163.91, | 5203065.00, | 4.66, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 1.06091 AT ( | 430089.31, | 5203065.00, | 4.94, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 1.05917 AT ( | 430139.06, | 5203065.00, | 4.66, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 1.05186 AT ( | 430076.91, | 5203065.00, | 5.05, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 1.04810 AT ( | 430176.34, | 5203077.50, | 5.06, |
| 92.43, | 0.00) DC              |              |            |             |       |
| EP02   | 1ST HIGHEST VALUE IS  | 0.48861 AT ( | 430188.78, | 5203040.50, | 4.68, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 0.48635 AT ( | 430176.34, | 5203040.50, | 5.19, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.48510 AT ( | 430192.87, | 5203041.83, | 4.23, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.46779 AT ( | 430163.91, | 5203040.50, | 4.76, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 0.45622 AT ( | 430151.50, | 5203040.50, | 4.81, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.45555 AT ( | 430188.78, | 5203053.00, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| 92.43, | 7TH HIGHEST VALUE IS  | 0.45159 AT ( | 430176.34, | 5203053.00, | 5.12, |
| 0.00)  | DC                    |              |            |             |       |
| 92.43, | 8TH HIGHEST VALUE IS  | 0.45025 AT ( | 430193.52, | 5203054.23, | 4.25, |
| 0.00)  | DC                    |              |            |             |       |
| 92.43, | 9TH HIGHEST VALUE IS  | 0.44955 AT ( | 430176.34, | 5203028.00, | 5.19, |
| 0.00)  | DC                    |              |            |             |       |
| 92.43, | 10TH HIGHEST VALUE IS | 0.44684 AT ( | 430192.23, | 5203029.44, | 4.28, |
| 0.00)  | DC                    |              |            |             |       |
| EP03   | 1ST HIGHEST VALUE IS  | 0.49040 AT ( | 430188.78, | 5203040.50, | 4.68, |
| 92.43, | 0.00)                 | DC           |            |             |       |
| 92.43, | 2ND HIGHEST VALUE IS  | 0.48791 AT ( | 430192.87, | 5203041.83, | 4.23, |
| 0.00)  | DC                    |              |            |             |       |
| 92.43, | 3RD HIGHEST VALUE IS  | 0.48364 AT ( | 430176.34, | 5203040.50, | 5.19, |
| 0.00)  | DC                    |              |            |             |       |
| 92.43, | 4TH HIGHEST VALUE IS  | 0.46461 AT ( | 430163.91, | 5203040.50, | 4.76, |
| 0.00)  | DC                    |              |            |             |       |
| 92.43, | 5TH HIGHEST VALUE IS  | 0.45803 AT ( | 430188.78, | 5203053.00, | 4.70, |
| 0.00)  | DC                    |              |            |             |       |
| 92.43, | 6TH HIGHEST VALUE IS  | 0.45627 AT ( | 430192.23, | 5203029.44, | 4.28, |
| 0.00)  | DC                    |              |            |             |       |
| 92.43, | 7TH HIGHEST VALUE IS  | 0.45479 AT ( | 430188.78, | 5203028.00, | 4.70, |
| 0.00)  | DC                    |              |            |             |       |
| 92.43, | 8TH HIGHEST VALUE IS  | 0.45449 AT ( | 430151.50, | 5203040.50, | 4.81, |
| 0.00)  | DC                    |              |            |             |       |
| 92.43, | 9TH HIGHEST VALUE IS  | 0.45339 AT ( | 430193.52, | 5203054.23, | 4.25, |
| 0.00)  | DC                    |              |            |             |       |
| 92.43, | 10TH HIGHEST VALUE IS | 0.45284 AT ( | 430176.34, | 5203028.00, | 5.19, |
| 0.00)  | DC                    |              |            |             |       |

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*

07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*

\*\*\* 04:30:18

PAGE 13

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 6TH-HIGHEST 24-HR RESULTS  
AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID      | NETWORK | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |
|---------------|---------|--------------|--------------------------|
| ZHILL, ZFLAG) | OF TYPE | GRID-ID      |                          |
| -----         |         |              |                          |

- - - - -

|        |                       |              |            |             |        |
|--------|-----------------------|--------------|------------|-------------|--------|
| EP04   | 1ST HIGHEST VALUE IS  | 3.99114 AT ( | 430413.00, | 5203787.50, | 72.04, |
| 92.43, | 0.00) DC              |              |            |             |        |
|        | 2ND HIGHEST VALUE IS  | 3.91311 AT ( | 430487.69, | 5203812.50, | 72.07, |
| 92.43, | 0.00) DC              |              |            |             |        |
|        | 3RD HIGHEST VALUE IS  | 3.90998 AT ( | 430528.06, | 5203862.50, | 71.41, |
| 92.43, | 0.00) DC              |              |            |             |        |
|        | 4TH HIGHEST VALUE IS  | 3.88258 AT ( | 430388.09, | 5203762.50, | 64.80, |
| 92.43, | 0.00) DC              |              |            |             |        |
|        | 5TH HIGHEST VALUE IS  | 3.82398 AT ( | 430437.91, | 5203787.50, | 65.49, |
| 92.43, | 0.00) DC              |              |            |             |        |
|        | 6TH HIGHEST VALUE IS  | 3.74472 AT ( | 430478.81, | 5203862.50, | 68.62, |
| 92.43, | 0.00) DC              |              |            |             |        |
|        | 7TH HIGHEST VALUE IS  | 3.60920 AT ( | 430577.28, | 5203912.50, | 72.20, |
| 91.58, | 0.00) DC              |              |            |             |        |
|        | 8TH HIGHEST VALUE IS  | 3.50547 AT ( | 430462.78, | 5203812.50, | 77.60, |
| 92.43, | 0.00) DC              |              |            |             |        |
|        | 9TH HIGHEST VALUE IS  | 3.50366 AT ( | 430512.56, | 5203812.50, | 62.27, |
| 92.43, | 0.00) DC              |              |            |             |        |
|        | 10TH HIGHEST VALUE IS | 3.49780 AT ( | 430626.53, | 5203862.50, | 65.38, |
| 92.43, | 0.00) DC              |              |            |             |        |
| EP05   | 1ST HIGHEST VALUE IS  | 0.16351 AT ( | 430675.64, | 5202899.18, | 5.44,  |
| 5.44,  | 0.00) DC              |              |            |             |        |
|        | 2ND HIGHEST VALUE IS  | 0.16152 AT ( | 430190.67, | 5203001.72, | 4.41,  |
| 92.43, | 0.00) DC              |              |            |             |        |
|        | 3RD HIGHEST VALUE IS  | 0.16028 AT ( | 430188.78, | 5203003.00, | 4.68,  |
| 92.43, | 0.00) DC              |              |            |             |        |
|        | 4TH HIGHEST VALUE IS  | 0.15792 AT ( | 430682.76, | 5202907.93, | 5.36,  |
| 5.36,  | 0.00) DC              |              |            |             |        |
|        | 5TH HIGHEST VALUE IS  | 0.15735 AT ( | 430190.73, | 5203013.94, | 4.44,  |
| 92.43, | 0.00) DC              |              |            |             |        |
|        | 6TH HIGHEST VALUE IS  | 0.15723 AT ( | 430188.78, | 5203015.50, | 4.70,  |
| 92.43, | 0.00) DC              |              |            |             |        |
|        | 7TH HIGHEST VALUE IS  | 0.15658 AT ( | 430192.23, | 5203029.44, | 4.28,  |
| 92.43, | 0.00) DC              |              |            |             |        |
|        | 8TH HIGHEST VALUE IS  | 0.15623 AT ( | 430188.78, | 5203028.00, | 4.70,  |
| 92.43, | 0.00) DC              |              |            |             |        |
|        | 9TH HIGHEST VALUE IS  | 0.15600 AT ( | 430686.09, | 5202903.50, | 5.38,  |
| 5.38,  | 0.00) DC              |              |            |             |        |
|        | 10TH HIGHEST VALUE IS | 0.15547 AT ( | 430191.48, | 5203021.69, | 4.36,  |
| 92.43, | 0.00) DC              |              |            |             |        |
| EP06   | 1ST HIGHEST VALUE IS  | 0.16042 AT ( | 430190.67, | 5203001.72, | 4.41,  |
| 92.43, | 0.00) DC              |              |            |             |        |
|        | 2ND HIGHEST VALUE IS  | 0.15764 AT ( | 430188.78, | 5203003.00, | 4.68,  |
| 92.43, | 0.00) DC              |              |            |             |        |
|        | 3RD HIGHEST VALUE IS  | 0.15546 AT ( | 430190.73, | 5203013.94, | 4.44,  |
| 92.43, | 0.00) DC              |              |            |             |        |



|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| 92.43, | 4TH HIGHEST VALUE IS  | 0.15512 AT ( | 430188.78, | 5203015.50, | 4.70, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 5TH HIGHEST VALUE IS  | 0.15419 AT ( | 430192.23, | 5203029.44, | 4.28, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 6TH HIGHEST VALUE IS  | 0.15372 AT ( | 430191.48, | 5203021.69, | 4.36, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 7TH HIGHEST VALUE IS  | 0.15359 AT ( | 430188.78, | 5203028.00, | 4.70, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 8TH HIGHEST VALUE IS  | 0.15178 AT ( | 430176.34, | 5203003.00, | 5.28, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 9TH HIGHEST VALUE IS  | 0.14946 AT ( | 430188.78, | 5202978.00, | 4.73, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 10TH HIGHEST VALUE IS | 0.14938 AT ( | 430176.34, | 5203015.50, | 5.23, |
|        | 0.00) DC              |              |            |             |       |
| EP08   | 1ST HIGHEST VALUE IS  | 1.69801 AT ( | 430194.80, | 5203079.01, | 4.42, |
| 92.43, | 0.00) DC              |              |            |             |       |
| 92.43, | 2ND HIGHEST VALUE IS  | 1.68553 AT ( | 430188.78, | 5203077.50, | 4.73, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 3RD HIGHEST VALUE IS  | 1.68402 AT ( | 430194.16, | 5203066.62, | 4.29, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 4TH HIGHEST VALUE IS  | 1.67445 AT ( | 430193.52, | 5203054.23, | 4.25, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 5TH HIGHEST VALUE IS  | 1.67371 AT ( | 430188.78, | 5203053.00, | 4.70, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 6TH HIGHEST VALUE IS  | 1.66700 AT ( | 430188.78, | 5203065.00, | 4.67, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 7TH HIGHEST VALUE IS  | 1.65970 AT ( | 430176.34, | 5203077.50, | 5.06, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 8TH HIGHEST VALUE IS  | 1.64781 AT ( | 430176.34, | 5203053.00, | 5.12, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 9TH HIGHEST VALUE IS  | 1.64744 AT ( | 430176.34, | 5203065.00, | 5.11, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 10TH HIGHEST VALUE IS | 1.64322 AT ( | 430195.44, | 5203091.41, | 4.39, |
|        | 0.00) DC              |              |            |             |       |

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*

07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*

\*\*\*

04:30:18

PAGE 14

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 6TH-HIGHEST 24-HR RESULTS  
AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID              | NETWORK               | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV,     |
|-----------------------|-----------------------|--------------|------------------------------|
| ZHILL, ZFLAG) OF TYPE | GRID-ID               |              |                              |
| -----                 |                       |              |                              |
| -----                 |                       |              |                              |
| EP09                  | 1ST HIGHEST VALUE IS  | 0.31036 AT ( | 430744.02, 5203016.94, 5.14, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 2ND HIGHEST VALUE IS  | 0.30831 AT ( | 430738.77, 5203027.94, 5.10, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 3RD HIGHEST VALUE IS  | 0.30110 AT ( | 430748.25, 5203015.50, 5.09, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 4TH HIGHEST VALUE IS  | 0.29219 AT ( | 430749.27, 5203005.94, 5.13, |
| 5.13,                 | 0.00) DC              |              |                              |
|                       | 5TH HIGHEST VALUE IS  | 0.28950 AT ( | 430731.77, 5203037.94, 5.11, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 6TH HIGHEST VALUE IS  | 0.28449 AT ( | 430724.77, 5203047.94, 5.10, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 7TH HIGHEST VALUE IS  | 0.28025 AT ( | 430748.25, 5203028.00, 5.07, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 8TH HIGHEST VALUE IS  | 0.27944 AT ( | 430717.77, 5203057.94, 5.11, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 9TH HIGHEST VALUE IS  | 0.27255 AT ( | 430723.38, 5203053.00, 5.09, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 10TH HIGHEST VALUE IS | 0.27249 AT ( | 430760.69, 5203015.50, 5.14, |
| 92.43,                | 0.00) DC              |              |                              |
| EP10                  | 1ST HIGHEST VALUE IS  | 1.76087 AT ( | 430715.77, 5203067.94, 5.15, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 2ND HIGHEST VALUE IS  | 1.75282 AT ( | 430713.77, 5203077.94, 5.23, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 3RD HIGHEST VALUE IS  | 1.68524 AT ( | 430713.80, 5203090.14, 5.09, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 4TH HIGHEST VALUE IS  | 1.60033 AT ( | 430713.84, 5203102.34, 5.03, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 5TH HIGHEST VALUE IS  | 1.58518 AT ( | 430717.77, 5203057.94, 5.11, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 6TH HIGHEST VALUE IS  | 1.58356 AT ( | 430723.38, 5203077.50, 5.13, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 7TH HIGHEST VALUE IS  | 1.56726 AT ( | 430723.38, 5203090.00, 5.16, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 8TH HIGHEST VALUE IS  | 1.56000 AT ( | 430713.87, 5203114.54, 4.99, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 9TH HIGHEST VALUE IS  | 1.53304 AT ( | 430723.38, 5203102.50, 5.18, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 10TH HIGHEST VALUE IS | 1.49625 AT ( | 430723.38, 5203065.00, 5.01, |
| 92.43,                | 0.00) DC              |              |                              |

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| EP11   | 1ST HIGHEST VALUE IS  | 1.53859 AT ( | 430713.77, | 5203077.94, | 5.23, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 1.53367 AT ( | 430713.80, | 5203090.14, | 5.09, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 1.52331 AT ( | 430715.77, | 5203067.94, | 5.15, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 1.47921 AT ( | 430713.84, | 5203102.34, | 5.03, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 1.45395 AT ( | 430723.38, | 5203102.50, | 5.18, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 1.45140 AT ( | 430723.38, | 5203077.50, | 5.13, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 1.44348 AT ( | 430713.87, | 5203114.54, | 4.99, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 1.44311 AT ( | 430723.38, | 5203090.00, | 5.16, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 1.38054 AT ( | 430717.77, | 5203057.94, | 5.11, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 1.34417 AT ( | 430723.38, | 5203065.00, | 5.01, |
| 92.43, | 0.00) DC              |              |            |             |       |
| EP12   | 1ST HIGHEST VALUE IS  | 0.60608 AT ( | 430717.77, | 5203057.94, | 5.11, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 0.59058 AT ( | 430715.77, | 5203067.94, | 5.15, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.58440 AT ( | 430723.38, | 5203053.00, | 5.09, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.57177 AT ( | 430724.77, | 5203047.94, | 5.10, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 0.56942 AT ( | 430723.38, | 5203065.00, | 5.01, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.56287 AT ( | 430713.77, | 5203077.94, | 5.23, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.55835 AT ( | 430723.38, | 5203077.50, | 5.13, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.54969 AT ( | 430785.53, | 5203053.00, | 5.88, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.54655 AT ( | 430797.97, | 5203053.00, | 6.12, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 0.54635 AT ( | 430785.53, | 5203065.00, | 5.88, |
| 92.43, | 0.00) DC              |              |            |             |       |

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*

\*\*\* 04:30:18

PAGE 15

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 6TH-HIGHEST 24-HR RESULTS  
 AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3  
 \*\*

| GROUP ID      |                       | NETWORK | AVERAGE CONC |      | RECEPTOR (XR, YR, ZELEV, |             |       |
|---------------|-----------------------|---------|--------------|------|--------------------------|-------------|-------|
| ZHILL, ZFLAG) | OF TYPE               | GRID-ID |              |      |                          |             |       |
| -----         |                       |         |              |      |                          |             |       |
| -----         |                       |         |              |      |                          |             |       |
| EP13          | 1ST HIGHEST VALUE IS  |         | 1.77886      | AT ( | 430713.77,               | 5203077.94, | 5.23, |
| 92.43,        | 0.00) DC              |         |              |      |                          |             |       |
|               | 2ND HIGHEST VALUE IS  |         | 1.77776      | AT ( | 430713.80,               | 5203090.14, | 5.09, |
| 92.43,        | 0.00) DC              |         |              |      |                          |             |       |
|               | 3RD HIGHEST VALUE IS  |         | 1.76196      | AT ( | 430715.77,               | 5203067.94, | 5.15, |
| 92.43,        | 0.00) DC              |         |              |      |                          |             |       |
|               | 4TH HIGHEST VALUE IS  |         | 1.74250      | AT ( | 430713.84,               | 5203102.34, | 5.03, |
| 92.43,        | 0.00) DC              |         |              |      |                          |             |       |
|               | 5TH HIGHEST VALUE IS  |         | 1.65869      | AT ( | 430713.87,               | 5203114.54, | 4.99, |
| 92.43,        | 0.00) DC              |         |              |      |                          |             |       |
|               | 6TH HIGHEST VALUE IS  |         | 1.62549      | AT ( | 430723.38,               | 5203102.50, | 5.18, |
| 92.43,        | 0.00) DC              |         |              |      |                          |             |       |
|               | 7TH HIGHEST VALUE IS  |         | 1.60747      | AT ( | 430723.38,               | 5203090.00, | 5.16, |
| 92.43,        | 0.00) DC              |         |              |      |                          |             |       |
|               | 8TH HIGHEST VALUE IS  |         | 1.58820      | AT ( | 430723.38,               | 5203077.50, | 5.13, |
| 92.43,        | 0.00) DC              |         |              |      |                          |             |       |
|               | 9TH HIGHEST VALUE IS  |         | 1.57766      | AT ( | 430717.77,               | 5203057.94, | 5.11, |
| 92.43,        | 0.00) DC              |         |              |      |                          |             |       |
|               | 10TH HIGHEST VALUE IS |         | 1.56507      | AT ( | 430713.90,               | 5203126.74, | 4.97, |
| 92.43,        | 0.00) DC              |         |              |      |                          |             |       |
| EP14          | 1ST HIGHEST VALUE IS  |         | 1.54374      | AT ( | 430713.80,               | 5203090.14, | 5.09, |
| 92.43,        | 0.00) DC              |         |              |      |                          |             |       |
|               | 2ND HIGHEST VALUE IS  |         | 1.53752      | AT ( | 430713.84,               | 5203102.34, | 5.03, |
| 92.43,        | 0.00) DC              |         |              |      |                          |             |       |
|               | 3RD HIGHEST VALUE IS  |         | 1.48782      | AT ( | 430713.77,               | 5203077.94, | 5.23, |
| 92.43,        | 0.00) DC              |         |              |      |                          |             |       |
|               | 4TH HIGHEST VALUE IS  |         | 1.48275      | AT ( | 430713.87,               | 5203114.54, | 4.99, |
| 92.43,        | 0.00) DC              |         |              |      |                          |             |       |
|               | 5TH HIGHEST VALUE IS  |         | 1.44650      | AT ( | 430723.38,               | 5203102.50, | 5.18, |
| 92.43,        | 0.00) DC              |         |              |      |                          |             |       |
|               | 6TH HIGHEST VALUE IS  |         | 1.43152      | AT ( | 430713.90,               | 5203126.74, | 4.97, |
| 92.43,        | 0.00) DC              |         |              |      |                          |             |       |
|               | 7TH HIGHEST VALUE IS  |         | 1.42472      | AT ( | 430715.77,               | 5203067.94, | 5.15, |
| 92.43,        | 0.00) DC              |         |              |      |                          |             |       |
|               | 8TH HIGHEST VALUE IS  |         | 1.40652      | AT ( | 430723.38,               | 5203090.00, | 5.16, |

|        |                       |         |                 |             |       |
|--------|-----------------------|---------|-----------------|-------------|-------|
| 92.43, | 0.00) DC              |         |                 |             |       |
|        | 9TH HIGHEST VALUE IS  | 1.39554 | AT ( 430713.94, | 5203138.94, | 4.91, |
| 92.43, | 0.00) DC              |         |                 |             |       |
|        | 10TH HIGHEST VALUE IS | 1.39523 | AT ( 430723.38, | 5203115.00, | 5.09, |
| 92.43, | 0.00) DC              |         |                 |             |       |
| FEL_P1 | 1ST HIGHEST VALUE IS  | 2.44999 | AT ( 430196.73, | 5203116.20, | 4.25, |
| 92.43, | 0.00) DC              |         |                 |             |       |
|        | 2ND HIGHEST VALUE IS  | 2.42231 | AT ( 430197.37, | 5203128.59, | 4.30, |
| 92.43, | 0.00) DC              |         |                 |             |       |
|        | 3RD HIGHEST VALUE IS  | 2.36137 | AT ( 430188.78, | 5203115.00, | 4.70, |
| 92.43, | 0.00) DC              |         |                 |             |       |
|        | 4TH HIGHEST VALUE IS  | 2.33367 | AT ( 430196.09, | 5203103.80, | 4.32, |
| 92.43, | 0.00) DC              |         |                 |             |       |
|        | 5TH HIGHEST VALUE IS  | 2.33363 | AT ( 430188.78, | 5203127.50, | 4.71, |
| 92.43, | 0.00) DC              |         |                 |             |       |
|        | 6TH HIGHEST VALUE IS  | 2.27400 | AT ( 430198.02, | 5203140.98, | 4.33, |
| 92.43, | 0.00) DC              |         |                 |             |       |
|        | 7TH HIGHEST VALUE IS  | 2.27293 | AT ( 430188.78, | 5203102.50, | 4.73, |
| 92.43, | 0.00) DC              |         |                 |             |       |
|        | 8TH HIGHEST VALUE IS  | 2.19827 | AT ( 430188.78, | 5203140.00, | 4.72, |
| 92.43, | 0.00) DC              |         |                 |             |       |
|        | 9TH HIGHEST VALUE IS  | 2.19031 | AT ( 430195.44, | 5203091.41, | 4.39, |
| 92.43, | 0.00) DC              |         |                 |             |       |
|        | 10TH HIGHEST VALUE IS | 2.17725 | AT ( 430176.34, | 5203115.00, | 4.96, |
| 92.43, | 0.00) DC              |         |                 |             |       |
| FEL_P2 | 1ST HIGHEST VALUE IS  | 1.23851 | AT ( 430193.52, | 5203054.23, | 4.25, |
| 92.43, | 0.00) DC              |         |                 |             |       |
|        | 2ND HIGHEST VALUE IS  | 1.23090 | AT ( 430188.78, | 5203040.50, | 4.68, |
| 92.43, | 0.00) DC              |         |                 |             |       |
|        | 3RD HIGHEST VALUE IS  | 1.22935 | AT ( 430192.87, | 5203041.83, | 4.23, |
| 92.43, | 0.00) DC              |         |                 |             |       |
|        | 4TH HIGHEST VALUE IS  | 1.22749 | AT ( 430188.78, | 5203053.00, | 4.70, |
| 92.43, | 0.00) DC              |         |                 |             |       |
|        | 5TH HIGHEST VALUE IS  | 1.19900 | AT ( 430192.23, | 5203029.44, | 4.28, |
| 92.43, | 0.00) DC              |         |                 |             |       |
|        | 6TH HIGHEST VALUE IS  | 1.19536 | AT ( 430188.78, | 5203028.00, | 4.70, |
| 92.43, | 0.00) DC              |         |                 |             |       |
|        | 7TH HIGHEST VALUE IS  | 1.18365 | AT ( 430194.16, | 5203066.62, | 4.29, |
| 92.43, | 0.00) DC              |         |                 |             |       |
|        | 8TH HIGHEST VALUE IS  | 1.17701 | AT ( 430188.78, | 5203065.00, | 4.67, |
| 92.43, | 0.00) DC              |         |                 |             |       |
|        | 9TH HIGHEST VALUE IS  | 1.15984 | AT ( 430191.48, | 5203021.69, | 4.36, |
| 92.43, | 0.00) DC              |         |                 |             |       |
|        | 10TH HIGHEST VALUE IS | 1.14504 | AT ( 430176.34, | 5203053.00, | 5.12, |
| 92.43, | 0.00) DC              |         |                 |             |       |

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*

07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\*  
 \*\*\* 04:30:18

PAGE 16  
 \*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 6TH-HIGHEST 24-HR RESULTS  
 AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3  
 \*\*

| GROUP ID      |                       | NETWORK |         | AVERAGE CONC |            | RECEPTOR (XR, YR, ZELEV, |       |
|---------------|-----------------------|---------|---------|--------------|------------|--------------------------|-------|
| ZHILL, ZFLAG) | OF TYPE               | GRID-ID |         |              |            |                          |       |
| -----         |                       |         |         |              |            |                          |       |
| -----         |                       |         |         |              |            |                          |       |
| FEL_P3        | 1ST HIGHEST VALUE IS  |         | 0.97742 | AT (         | 430190.45, | 5202952.82,              | 5.21, |
| 92.43,        | 0.00) DC              |         |         |              |            |                          |       |
|               | 2ND HIGHEST VALUE IS  |         | 0.97295 | AT (         | 430190.51, | 5202965.05,              | 4.56, |
| 92.43,        | 0.00) DC              |         |         |              |            |                          |       |
|               | 3RD HIGHEST VALUE IS  |         | 0.97291 | AT (         | 430188.78, | 5202965.50,              | 4.77, |
| 92.43,        | 0.00) DC              |         |         |              |            |                          |       |
|               | 4TH HIGHEST VALUE IS  |         | 0.96791 | AT (         | 430188.78, | 5202953.50,              | 5.22, |
| 92.43,        | 0.00) DC              |         |         |              |            |                          |       |
|               | 5TH HIGHEST VALUE IS  |         | 0.96351 | AT (         | 430190.56, | 5202977.27,              | 4.52, |
| 92.43,        | 0.00) DC              |         |         |              |            |                          |       |
|               | 6TH HIGHEST VALUE IS  |         | 0.95586 | AT (         | 430188.78, | 5202978.00,              | 4.73, |
| 92.43,        | 0.00) DC              |         |         |              |            |                          |       |
|               | 7TH HIGHEST VALUE IS  |         | 0.92209 | AT (         | 430190.62, | 5202989.49,              | 4.43, |
| 92.43,        | 0.00) DC              |         |         |              |            |                          |       |
|               | 8TH HIGHEST VALUE IS  |         | 0.91951 | AT (         | 430188.78, | 5202990.50,              | 4.68, |
| 92.43,        | 0.00) DC              |         |         |              |            |                          |       |
|               | 9TH HIGHEST VALUE IS  |         | 0.90743 | AT (         | 430190.40, | 5202940.60,              | 4.77, |
| 5.44,         | 0.00) DC              |         |         |              |            |                          |       |
|               | 10TH HIGHEST VALUE IS |         | 0.90405 | AT (         | 430188.78, | 5202941.00,              | 4.95, |
| 4.95,         | 0.00) DC              |         |         |              |            |                          |       |
| LOAD_P        | 1ST HIGHEST VALUE IS  |         | 0.01907 | AT (         | 430194.16, | 5203066.62,              | 4.29, |
| 92.43,        | 0.00) DC              |         |         |              |            |                          |       |
|               | 2ND HIGHEST VALUE IS  |         | 0.01888 | AT (         | 430194.80, | 5203079.01,              | 4.42, |
| 92.43,        | 0.00) DC              |         |         |              |            |                          |       |
|               | 3RD HIGHEST VALUE IS  |         | 0.01873 | AT (         | 430713.87, | 5203114.54,              | 4.99, |
| 92.43,        | 0.00) DC              |         |         |              |            |                          |       |
|               | 4TH HIGHEST VALUE IS  |         | 0.01872 | AT (         | 430188.78, | 5203065.00,              | 4.67, |
| 92.43,        | 0.00) DC              |         |         |              |            |                          |       |
|               | 5TH HIGHEST VALUE IS  |         | 0.01870 | AT (         | 430192.87, | 5203041.83,              | 4.23, |

|        |                      |              |            |             |       |
|--------|----------------------|--------------|------------|-------------|-------|
| 92.43, | 0.00) DC             | 0.01865 AT ( | 430190.67, | 5203001.72, | 4.41, |
| 92.43, | 0.00) DC             | 0.01865 AT ( | 430188.78, | 5203077.50, | 4.73, |
| 92.43, | 0.00) DC             | 0.01857 AT ( | 430193.52, | 5203054.23, | 4.25, |
| 92.43, | 0.00) DC             | 0.01849 AT ( | 430713.77, | 5203077.94, | 5.23, |
| 92.43, | 0.00) DC             | 0.01844 AT ( | 430188.78, | 5203040.50, | 4.68, |
| 92.43, | 0.00) DC             |              |            |             |       |
| PILE1  | 1ST HIGHEST VALUE IS | 3.16795 AT ( | 430198.66, | 5203153.38, | 4.42, |
| 92.43, | 0.00) DC             | 3.15345 AT ( | 430199.30, | 5203165.77, | 4.48, |
| 92.43, | 0.00) DC             | 2.95869 AT ( | 430188.78, | 5203152.00, | 4.73, |
| 92.43, | 0.00) DC             | 2.93558 AT ( | 430198.02, | 5203140.98, | 4.33, |
| 92.43, | 0.00) DC             | 2.91643 AT ( | 430188.78, | 5203164.50, | 4.71, |
| 92.43, | 0.00) DC             | 2.86593 AT ( | 430199.94, | 5203178.16, | 4.29, |
| 92.43, | 0.00) DC             | 2.81279 AT ( | 430188.78, | 5203140.00, | 4.72, |
| 92.43, | 0.00) DC             | 2.71871 AT ( | 430197.37, | 5203128.59, | 4.30, |
| 92.43, | 0.00) DC             | 2.71301 AT ( | 430188.78, | 5203177.00, | 4.70, |
| 92.43, | 0.00) DC             | 2.64380 AT ( | 430176.34, | 5203152.00, | 4.84, |
| 92.43, | 0.00) DC             |              |            |             |       |
| PILE2  | 1ST HIGHEST VALUE IS | 3.85074 AT ( | 430188.78, | 5203028.00, | 4.70, |
| 92.43, | 0.00) DC             | 3.84552 AT ( | 430192.23, | 5203029.44, | 4.28, |
| 92.43, | 0.00) DC             | 3.77311 AT ( | 430191.48, | 5203021.69, | 4.36, |
| 92.43, | 0.00) DC             | 3.63030 AT ( | 430188.78, | 5203040.50, | 4.68, |
| 92.43, | 0.00) DC             | 3.57921 AT ( | 430188.78, | 5203015.50, | 4.70, |
| 92.43, | 0.00) DC             | 3.57298 AT ( | 430192.87, | 5203041.83, | 4.23, |
| 92.43, | 0.00) DC             | 3.54761 AT ( | 430190.73, | 5203013.94, | 4.44, |
| 92.43, | 0.00) DC             | 3.42966 AT ( | 430176.34, | 5203028.00, | 5.19, |
| 92.43, | 0.00) DC             | 3.31962 AT ( | 430188.78, | 5203003.00, | 4.68, |
|        | 9TH HIGHEST VALUE IS |              |            |             |       |



92.43, 0.00) DC  
10TH HIGHEST VALUE IS 3.30417 AT ( 430176.34, 5203040.50, 5.19,  
92.43, 0.00) DC

\*\*\* AERMOD - VERSION 22112 \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\*  
\*\*\* 04:30:18

PAGE 17

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 6TH-HIGHEST 24-HR RESULTS  
AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID      | NETWORK         | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |
|---------------|-----------------|--------------|--------------------------|
| ZHILL, ZFLAG) | OF TYPE GRID-ID |              |                          |
| - - - - -     | - - - - -       | - - - - -    | - - - - -                |
| - - - - -     | - - - - -       | - - - - -    | - - - - -                |

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| PILE3  | 1ST HIGHEST VALUE IS  | 3.61292 AT ( | 430188.78, | 5202941.00, | 4.95, |
| 4.95,  | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 3.61185 AT ( | 430190.45, | 5202952.82, | 5.21, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 3.58217 AT ( | 430190.40, | 5202940.60, | 4.77, |
| 5.44,  | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 3.53383 AT ( | 430188.78, | 5202953.50, | 5.22, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 3.34159 AT ( | 430190.34, | 5202928.38, | 4.63, |
| 5.40,  | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 3.33512 AT ( | 430188.78, | 5202928.50, | 4.81, |
| 5.40,  | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 3.26171 AT ( | 430176.34, | 5202941.00, | 5.52, |
| 5.52,  | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 3.16267 AT ( | 430176.34, | 5202953.50, | 5.50, |
| 5.50,  | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 3.14166 AT ( | 430176.34, | 5202928.50, | 5.54, |
| 5.54,  | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 3.14072 AT ( | 430190.29, | 5202916.15, | 4.59, |
| 5.41,  | 0.00) DC              |              |            |             |       |

|       |                      |              |            |             |       |
|-------|----------------------|--------------|------------|-------------|-------|
| T_P   | 1ST HIGHEST VALUE IS | 0.16726 AT ( | 430401.24, | 5202869.68, | 5.67, |
| 5.67, | 0.00) DC             |              |            |             |       |
|       | 2ND HIGHEST VALUE IS | 0.16039 AT ( | 430400.13, | 5202866.50, | 5.93, |

|        |                      |              |            |             |       |
|--------|----------------------|--------------|------------|-------------|-------|
| 5.93,  | 0.00) DC             | 0.14725 AT ( | 430389.49, | 5202871.55, | 5.49, |
| 5.49,  | 0.00) DC             | 0.14015 AT ( | 430387.69, | 5202866.50, | 5.92, |
| 5.92,  | 0.00) DC             | 0.12992 AT ( | 430377.74, | 5202873.43, | 5.40, |
| 5.40,  | 0.00) DC             | 0.12555 AT ( | 430371.74, | 5202875.68, | 5.23, |
| 5.23,  | 0.00) DC             | 0.12475 AT ( | 430424.74, | 5202865.93, | 6.02, |
| 6.02,  | 0.00) DC             | 0.12196 AT ( | 430375.28, | 5202866.50, | 5.91, |
| 5.91,  | 0.00) DC             | 0.12168 AT ( | 430412.99, | 5202867.80, | 5.95, |
| 5.95,  | 0.00) DC             | 0.12156 AT ( | 430365.74, | 5202877.93, | 5.16, |
| 5.16,  | 0.00) DC             |              |            |             |       |
| T_P1   | 1ST HIGHEST VALUE IS | 1.01630 AT ( | 430196.73, | 5203116.20, | 4.25, |
| 92.43, | 0.00) DC             | 0.93113 AT ( | 430188.78, | 5203115.00, | 4.70, |
| 92.43, | 0.00) DC             | 0.90403 AT ( | 430196.09, | 5203103.80, | 4.32, |
| 92.43, | 0.00) DC             | 0.85436 AT ( | 430188.78, | 5203102.50, | 4.73, |
| 92.43, | 0.00) DC             | 0.79359 AT ( | 430195.44, | 5203091.41, | 4.39, |
| 92.43, | 0.00) DC             | 0.77001 AT ( | 430188.78, | 5203090.00, | 4.72, |
| 92.43, | 0.00) DC             | 0.76434 AT ( | 430188.78, | 5202928.50, | 4.81, |
| 5.40,  | 0.00) DC             | 0.76384 AT ( | 430190.34, | 5202928.38, | 4.63, |
| 5.40,  | 0.00) DC             | 0.75206 AT ( | 430401.24, | 5202869.68, | 5.67, |
| 5.67,  | 0.00) DC             | 0.75168 AT ( | 430176.34, | 5203115.00, | 4.96, |
| 92.43, | 0.00) DC             |              |            |             |       |
| T_P1EX | 1ST HIGHEST VALUE IS | 0.70418 AT ( | 430210.43, | 5203290.86, | 4.37, |
| 92.43, | 0.00) DC             | 0.67551 AT ( | 430201.22, | 5203289.00, | 3.87, |
| 92.43, | 0.00) DC             | 0.65252 AT ( | 430204.93, | 5203229.55, | 4.37, |
| 92.43, | 0.00) DC             | 0.64308 AT ( | 430204.83, | 5203219.25, | 4.33, |
| 92.43, | 0.00) DC             | 0.63001 AT ( | 430205.03, | 5203239.85, | 4.31, |
| 92.43, | 0.00) DC             | 0.61654 AT ( | 430204.73, | 5203208.95, | 4.43, |
|        | 6TH HIGHEST VALUE IS |              |            |             |       |

92.43, 0.00) DC  
 7TH HIGHEST VALUE IS 0.61311 AT ( 430201.22, 5203227.00, 4.18,  
 92.43, 0.00) DC  
 8TH HIGHEST VALUE IS 0.60628 AT ( 430210.73, 5203279.46, 4.32,  
 92.43, 0.00) DC  
 9TH HIGHEST VALUE IS 0.59972 AT ( 430201.22, 5203214.50, 4.09,  
 92.43, 0.00) DC  
 10TH HIGHEST VALUE IS 0.59521 AT ( 430201.22, 5203239.50, 4.05,  
 92.43, 0.00) DC

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
 07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*  
 \*\*\* 04:30:18

PAGE 18

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 6TH-HIGHEST 24-HR RESULTS  
 AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID      | NETWORK         | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |
|---------------|-----------------|--------------|--------------------------|
| ZHILL, ZFLAG) | OF TYPE GRID-ID |              |                          |
| - - - - -     | - - - - -       | - - - - -    | - - - - -                |
| - - - - -     | - - - - -       | - - - - -    | - - - - -                |

|        |                      |              |            |             |       |
|--------|----------------------|--------------|------------|-------------|-------|
| T_P2   | 1ST HIGHEST VALUE IS | 0.55610 AT ( | 430194.80, | 5203079.01, | 4.42, |
| 92.43, | 0.00) DC             |              |            |             |       |
|        | 2ND HIGHEST VALUE IS | 0.51687 AT ( | 430188.78, | 5203077.50, | 4.73, |
| 92.43, | 0.00) DC             |              |            |             |       |
|        | 3RD HIGHEST VALUE IS | 0.49097 AT ( | 430194.16, | 5203066.62, | 4.29, |
| 92.43, | 0.00) DC             |              |            |             |       |
|        | 4TH HIGHEST VALUE IS | 0.47032 AT ( | 430188.78, | 5203065.00, | 4.67, |
| 92.43, | 0.00) DC             |              |            |             |       |
|        | 5TH HIGHEST VALUE IS | 0.43766 AT ( | 430193.52, | 5203054.23, | 4.25, |
| 92.43, | 0.00) DC             |              |            |             |       |
|        | 6TH HIGHEST VALUE IS | 0.43573 AT ( | 430188.78, | 5203053.00, | 4.70, |
| 92.43, | 0.00) DC             |              |            |             |       |
|        | 7TH HIGHEST VALUE IS | 0.42725 AT ( | 430176.34, | 5203077.50, | 5.06, |
| 92.43, | 0.00) DC             |              |            |             |       |
|        | 8TH HIGHEST VALUE IS | 0.42377 AT ( | 430188.78, | 5202928.50, | 4.81, |
| 5.40,  | 0.00) DC             |              |            |             |       |
|        | 9TH HIGHEST VALUE IS | 0.42351 AT ( | 430190.34, | 5202928.38, | 4.63, |
| 5.40,  | 0.00) DC             |              |            |             |       |

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
|        | 10TH HIGHEST VALUE IS | 0.42002 AT ( | 430188.78, | 5203090.00, | 4.72, |
| 92.43, | 0.00) DC              |              |            |             |       |
| T_P2EX | 1ST HIGHEST VALUE IS  | 0.38944 AT ( | 430201.22, | 5203289.00, | 3.87, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 0.36891 AT ( | 430210.43, | 5203290.86, | 4.37, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.35873 AT ( | 430204.93, | 5203229.55, | 4.37, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.35580 AT ( | 430204.83, | 5203219.25, | 4.33, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 0.34674 AT ( | 430205.03, | 5203239.85, | 4.31, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.34196 AT ( | 430210.73, | 5203279.46, | 4.32, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.33872 AT ( | 430204.73, | 5203208.95, | 4.43, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.33678 AT ( | 430201.22, | 5203227.00, | 4.18, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.33316 AT ( | 430201.22, | 5203214.50, | 4.09, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 0.32969 AT ( | 430188.78, | 5203289.00, | 5.02, |
| 92.43, | 0.00) DC              |              |            |             |       |
| T_P3   | 1ST HIGHEST VALUE IS  | 0.47785 AT ( | 430188.78, | 5202990.50, | 4.68, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 0.46572 AT ( | 430190.62, | 5202989.49, | 4.43, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.45852 AT ( | 430190.67, | 5203001.72, | 4.41, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.43296 AT ( | 430188.78, | 5203003.00, | 4.68, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 0.42738 AT ( | 430176.34, | 5202990.50, | 5.33, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.42593 AT ( | 430188.78, | 5202978.00, | 4.73, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.41490 AT ( | 430190.56, | 5202977.27, | 4.52, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.39863 AT ( | 430176.34, | 5202978.00, | 5.39, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.37901 AT ( | 430176.34, | 5203003.00, | 5.28, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 0.36919 AT ( | 430188.78, | 5202965.50, | 4.77, |
| 92.43, | 0.00) DC              |              |            |             |       |
| T_P3EX | 1ST HIGHEST VALUE IS  | 0.29189 AT ( | 430210.43, | 5203290.86, | 4.37, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 0.28768 AT ( | 430204.93, | 5203229.55, | 4.37, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.28475 AT ( | 430204.83, | 5203219.25, | 4.33, |

92.43, 0.00) DC  
 4TH HIGHEST VALUE IS 0.28288 AT ( 430201.22, 5203289.00, 3.87,  
 92.43, 0.00) DC  
 5TH HIGHEST VALUE IS 0.27495 AT ( 430205.03, 5203239.85, 4.31,  
 92.43, 0.00) DC  
 6TH HIGHEST VALUE IS 0.27163 AT ( 430201.22, 5203227.00, 4.18,  
 92.43, 0.00) DC  
 7TH HIGHEST VALUE IS 0.27039 AT ( 430204.73, 5203208.95, 4.43,  
 92.43, 0.00) DC  
 8TH HIGHEST VALUE IS 0.26687 AT ( 430210.73, 5203279.46, 4.32,  
 92.43, 0.00) DC  
 9TH HIGHEST VALUE IS 0.26595 AT ( 430201.22, 5203214.50, 4.09,  
 92.43, 0.00) DC  
 10TH HIGHEST VALUE IS 0.26008 AT ( 430201.22, 5203239.50, 4.05,  
 92.43, 0.00) DC

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
 07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*  
 \*\*\* 04:30:18

PAGE 19

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 6TH-HIGHEST 24-HR RESULTS  
 AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID      | NETWORK         | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |
|---------------|-----------------|--------------|--------------------------|
| ZHILL, ZFLAG) | OF TYPE GRID-ID |              |                          |
| - - - - -     | - - - - -       | - - - - -    | - - - - -                |
| - - - - -     | - - - - -       | - - - - -    | - - - - -                |

T\_PEX 1ST HIGHEST VALUE IS 0.48255 AT ( 430210.43, 5203290.86, 4.37,  
 92.43, 0.00) DC  
 2ND HIGHEST VALUE IS 0.45885 AT ( 430201.22, 5203289.00, 3.87,  
 92.43, 0.00) DC  
 3RD HIGHEST VALUE IS 0.39380 AT ( 430210.73, 5203279.46, 4.32,  
 92.43, 0.00) DC  
 4TH HIGHEST VALUE IS 0.38294 AT ( 430188.78, 5203289.00, 5.02,  
 92.43, 0.00) DC  
 5TH HIGHEST VALUE IS 0.34207 AT ( 430201.22, 5203276.50, 3.94,  
 92.43, 0.00) DC  
 6TH HIGHEST VALUE IS 0.33165 AT ( 430201.22, 5203301.50, 3.49,  
 92.43, 0.00) DC

|        |                       |               |            |             |       |
|--------|-----------------------|---------------|------------|-------------|-------|
| 92.43, | 7TH HIGHEST VALUE IS  | 0.32654 AT (  | 430210.13, | 5203302.26, | 3.15, |
| 0.00)  | DC                    |               |            |             |       |
| 92.43, | 8TH HIGHEST VALUE IS  | 0.31739 AT (  | 430188.78, | 5203276.50, | 4.92, |
| 0.00)  | DC                    |               |            |             |       |
| 92.43, | 9TH HIGHEST VALUE IS  | 0.31620 AT (  | 430188.78, | 5203301.50, | 5.13, |
| 0.00)  | DC                    |               |            |             |       |
| 92.43, | 10TH HIGHEST VALUE IS | 0.31321 AT (  | 430176.34, | 5203289.00, | 4.43, |
| 0.00)  | DC                    |               |            |             |       |
| ALL    | 1ST HIGHEST VALUE IS  | 12.14241 AT ( | 430188.78, | 5203028.00, | 4.70, |
| 92.43, | 0.00)                 | DC            |            |             |       |
| 92.43, | 2ND HIGHEST VALUE IS  | 12.08975 AT ( | 430192.23, | 5203029.44, | 4.28, |
| 0.00)  | DC                    |               |            |             |       |
| 92.43, | 3RD HIGHEST VALUE IS  | 12.07017 AT ( | 430188.78, | 5203040.50, | 4.68, |
| 0.00)  | DC                    |               |            |             |       |
| 92.43, | 4TH HIGHEST VALUE IS  | 11.94006 AT ( | 430192.87, | 5203041.83, | 4.23, |
| 0.00)  | DC                    |               |            |             |       |
| 92.43, | 5TH HIGHEST VALUE IS  | 11.87274 AT ( | 430176.34, | 5203028.00, | 5.19, |
| 0.00)  | DC                    |               |            |             |       |
| 92.43, | 6TH HIGHEST VALUE IS  | 11.73906 AT ( | 430188.78, | 5203053.00, | 4.70, |
| 0.00)  | DC                    |               |            |             |       |
| 92.43, | 7TH HIGHEST VALUE IS  | 11.69480 AT ( | 430176.34, | 5203040.50, | 5.19, |
| 0.00)  | DC                    |               |            |             |       |
| 92.43, | 8TH HIGHEST VALUE IS  | 11.65013 AT ( | 430191.48, | 5203021.69, | 4.36, |
| 0.00)  | DC                    |               |            |             |       |
| 92.43, | 9TH HIGHEST VALUE IS  | 11.57526 AT ( | 430193.52, | 5203054.23, | 4.25, |
| 0.00)  | DC                    |               |            |             |       |
| 92.43, | 10TH HIGHEST VALUE IS | 11.45520 AT ( | 430188.78, | 5203015.50, | 4.70, |
| 0.00)  | DC                    |               |            |             |       |

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*

07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*

\*\*\* 04:30:18

PAGE 20

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 8TH-HIGHEST 24-HR RESULTS  
AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID      | NETWORK | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |
|---------------|---------|--------------|--------------------------|
| ZHILL, ZFLAG) | OF TYPE | GRID-ID      |                          |
| -----         |         |              |                          |

- - - - -

|      |                       |              |            |             |       |
|------|-----------------------|--------------|------------|-------------|-------|
| EG   | 1ST HIGHEST VALUE IS  | 0.06385 AT ( | 430188.78, | 5202903.50, | 4.79, |
|      | 4.79, 0.00) DC        |              |            |             |       |
|      | 2ND HIGHEST VALUE IS  | 0.06378 AT ( | 430176.34, | 5202916.00, | 5.53, |
|      | 5.53, 0.00) DC        |              |            |             |       |
|      | 3RD HIGHEST VALUE IS  | 0.06369 AT ( | 430190.23, | 5202903.93, | 4.63, |
|      | 4.63, 0.00) DC        |              |            |             |       |
|      | 4TH HIGHEST VALUE IS  | 0.06364 AT ( | 430176.34, | 5202903.50, | 5.56, |
|      | 5.56, 0.00) DC        |              |            |             |       |
|      | 5TH HIGHEST VALUE IS  | 0.06363 AT ( | 430206.98, | 5202890.68, | 5.02, |
|      | 5.02, 0.00) DC        |              |            |             |       |
|      | 6TH HIGHEST VALUE IS  | 0.06331 AT ( | 430215.23, | 5202890.93, | 5.02, |
|      | 5.02, 0.00) DC        |              |            |             |       |
|      | 7TH HIGHEST VALUE IS  | 0.06320 AT ( | 430188.78, | 5202916.00, | 4.78, |
|      | 4.78, 0.00) DC        |              |            |             |       |
|      | 8TH HIGHEST VALUE IS  | 0.06315 AT ( | 430190.29, | 5202916.15, | 4.59, |
|      | 5.41, 0.00) DC        |              |            |             |       |
|      | 9TH HIGHEST VALUE IS  | 0.06301 AT ( | 430198.73, | 5202890.43, | 4.91, |
|      | 4.91, 0.00) DC        |              |            |             |       |
|      | 10TH HIGHEST VALUE IS | 0.06249 AT ( | 430191.23, | 5202892.43, | 4.68, |
|      | 4.68, 0.00) DC        |              |            |             |       |
| EP01 | 1ST HIGHEST VALUE IS  | 1.00715 AT ( | 430114.19, | 5203077.50, | 4.76, |
|      | 92.43, 0.00) DC       |              |            |             |       |
|      | 2ND HIGHEST VALUE IS  | 1.00357 AT ( | 430126.63, | 5203077.50, | 4.69, |
|      | 92.43, 0.00) DC       |              |            |             |       |
|      | 3RD HIGHEST VALUE IS  | 1.00066 AT ( | 430101.75, | 5203077.50, | 4.76, |
|      | 92.43, 0.00) DC       |              |            |             |       |
|      | 4TH HIGHEST VALUE IS  | 0.99931 AT ( | 430139.06, | 5203077.50, | 4.62, |
|      | 92.43, 0.00) DC       |              |            |             |       |
|      | 5TH HIGHEST VALUE IS  | 0.99566 AT ( | 430176.34, | 5203077.50, | 5.06, |
|      | 92.43, 0.00) DC       |              |            |             |       |
|      | 6TH HIGHEST VALUE IS  | 0.99395 AT ( | 430151.50, | 5203077.50, | 4.67, |
|      | 92.43, 0.00) DC       |              |            |             |       |
|      | 7TH HIGHEST VALUE IS  | 0.99324 AT ( | 430089.31, | 5203077.50, | 4.89, |
|      | 92.43, 0.00) DC       |              |            |             |       |
|      | 8TH HIGHEST VALUE IS  | 0.98676 AT ( | 430089.31, | 5203065.00, | 4.94, |
|      | 92.43, 0.00) DC       |              |            |             |       |
|      | 9TH HIGHEST VALUE IS  | 0.98604 AT ( | 430076.91, | 5203065.00, | 5.05, |
|      | 92.43, 0.00) DC       |              |            |             |       |
|      | 10TH HIGHEST VALUE IS | 0.98596 AT ( | 430114.19, | 5203065.00, | 4.73, |
|      | 92.43, 0.00) DC       |              |            |             |       |
| EP02 | 1ST HIGHEST VALUE IS  | 0.45669 AT ( | 430176.34, | 5203040.50, | 5.19, |
|      | 92.43, 0.00) DC       |              |            |             |       |
|      | 2ND HIGHEST VALUE IS  | 0.45628 AT ( | 430188.78, | 5203040.50, | 4.68, |
|      | 92.43, 0.00) DC       |              |            |             |       |
|      | 3RD HIGHEST VALUE IS  | 0.45047 AT ( | 430192.87, | 5203041.83, | 4.23, |
|      | 92.43, 0.00) DC       |              |            |             |       |



|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| 92.43, | 4TH HIGHEST VALUE IS  | 0.44095 AT ( | 430163.91, | 5203040.50, | 4.76, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 5TH HIGHEST VALUE IS  | 0.43225 AT ( | 430188.78, | 5203028.00, | 4.70, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 6TH HIGHEST VALUE IS  | 0.43123 AT ( | 430151.50, | 5203040.50, | 4.81, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 7TH HIGHEST VALUE IS  | 0.42950 AT ( | 430176.34, | 5203028.00, | 5.19, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 8TH HIGHEST VALUE IS  | 0.42907 AT ( | 430188.78, | 5203053.00, | 4.70, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 9TH HIGHEST VALUE IS  | 0.42694 AT ( | 430192.23, | 5203029.44, | 4.28, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 10TH HIGHEST VALUE IS | 0.42668 AT ( | 430176.34, | 5203053.00, | 5.12, |
|        | 0.00) DC              |              |            |             |       |
| EP03   | 1ST HIGHEST VALUE IS  | 0.46201 AT ( | 430188.78, | 5203040.50, | 4.68, |
| 92.43, | 0.00) DC              |              |            |             |       |
| 92.43, | 2ND HIGHEST VALUE IS  | 0.45908 AT ( | 430176.34, | 5203040.50, | 5.19, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 3RD HIGHEST VALUE IS  | 0.45532 AT ( | 430192.87, | 5203041.83, | 4.23, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 4TH HIGHEST VALUE IS  | 0.44102 AT ( | 430163.91, | 5203040.50, | 4.76, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 5TH HIGHEST VALUE IS  | 0.43746 AT ( | 430188.78, | 5203028.00, | 4.70, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 6TH HIGHEST VALUE IS  | 0.43332 AT ( | 430188.78, | 5203053.00, | 4.70, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 7TH HIGHEST VALUE IS  | 0.43309 AT ( | 430192.23, | 5203029.44, | 4.28, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 8TH HIGHEST VALUE IS  | 0.43273 AT ( | 430176.34, | 5203028.00, | 5.19, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 9TH HIGHEST VALUE IS  | 0.42915 AT ( | 430176.34, | 5203053.00, | 5.12, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 10TH HIGHEST VALUE IS | 0.42863 AT ( | 430193.52, | 5203054.23, | 4.25, |
|        | 0.00) DC              |              |            |             |       |

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*

07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*

\*\*\*

04:30:18

PAGE 21

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 8TH-HIGHEST 24-HR RESULTS  
AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID              | NETWORK               | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV,      |
|-----------------------|-----------------------|--------------|-------------------------------|
| ZHILL, ZFLAG) OF TYPE | GRID-ID               |              |                               |
| -----                 |                       |              |                               |
| EP04                  | 1ST HIGHEST VALUE IS  | 3.60596 AT ( | 430413.00, 5203787.50, 72.04, |
| 92.43,                | 0.00) DC              |              |                               |
|                       | 2ND HIGHEST VALUE IS  | 3.51651 AT ( | 430487.69, 5203812.50, 72.07, |
| 92.43,                | 0.00) DC              |              |                               |
|                       | 3RD HIGHEST VALUE IS  | 3.44995 AT ( | 430437.91, 5203787.50, 65.49, |
| 92.43,                | 0.00) DC              |              |                               |
|                       | 4TH HIGHEST VALUE IS  | 3.42927 AT ( | 430577.28, 5203912.50, 72.20, |
| 91.58,                | 0.00) DC              |              |                               |
|                       | 5TH HIGHEST VALUE IS  | 3.42487 AT ( | 430528.06, 5203862.50, 71.41, |
| 92.43,                | 0.00) DC              |              |                               |
|                       | 6TH HIGHEST VALUE IS  | 3.39539 AT ( | 430388.09, 5203762.50, 64.80, |
| 92.43,                | 0.00) DC              |              |                               |
|                       | 7TH HIGHEST VALUE IS  | 3.30974 AT ( | 430478.81, 5203862.50, 68.62, |
| 92.43,                | 0.00) DC              |              |                               |
|                       | 8TH HIGHEST VALUE IS  | 3.24354 AT ( | 430626.53, 5203862.50, 65.38, |
| 92.43,                | 0.00) DC              |              |                               |
|                       | 9TH HIGHEST VALUE IS  | 3.20779 AT ( | 430429.59, 5203862.50, 66.08, |
| 92.43,                | 0.00) DC              |              |                               |
|                       | 10TH HIGHEST VALUE IS | 3.12562 AT ( | 430462.78, 5203812.50, 77.60, |
| 92.43,                | 0.00) DC              |              |                               |
| EP05                  | 1ST HIGHEST VALUE IS  | 0.14928 AT ( | 430188.78, 5203003.00, 4.68,  |
| 92.43,                | 0.00) DC              |              |                               |
|                       | 2ND HIGHEST VALUE IS  | 0.14866 AT ( | 430190.67, 5203001.72, 4.41,  |
| 92.43,                | 0.00) DC              |              |                               |
|                       | 3RD HIGHEST VALUE IS  | 0.14795 AT ( | 430191.48, 5203021.69, 4.36,  |
| 92.43,                | 0.00) DC              |              |                               |
|                       | 4TH HIGHEST VALUE IS  | 0.14606 AT ( | 430188.78, 5203015.50, 4.70,  |
| 92.43,                | 0.00) DC              |              |                               |
|                       | 5TH HIGHEST VALUE IS  | 0.14563 AT ( | 430675.64, 5202899.18, 5.44,  |
| 5.44,                 | 0.00) DC              |              |                               |
|                       | 6TH HIGHEST VALUE IS  | 0.14549 AT ( | 430192.23, 5203029.44, 4.28,  |
| 92.43,                | 0.00) DC              |              |                               |
|                       | 7TH HIGHEST VALUE IS  | 0.14525 AT ( | 430188.78, 5203028.00, 4.70,  |
| 92.43,                | 0.00) DC              |              |                               |
|                       | 8TH HIGHEST VALUE IS  | 0.14428 AT ( | 430188.78, 5202990.50, 4.68,  |
| 92.43,                | 0.00) DC              |              |                               |
|                       | 9TH HIGHEST VALUE IS  | 0.14394 AT ( | 430190.73, 5203013.94, 4.44,  |
| 92.43,                | 0.00) DC              |              |                               |
|                       | 10TH HIGHEST VALUE IS | 0.14391 AT ( | 430176.34, 5203003.00, 5.28,  |
| 92.43,                | 0.00) DC              |              |                               |

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| EP06   | 1ST HIGHEST VALUE IS  | 0.14783 AT ( | 430188.78, | 5203003.00, | 4.68, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 0.14763 AT ( | 430190.67, | 5203001.72, | 4.41, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.14602 AT ( | 430191.48, | 5203021.69, | 4.36, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.14452 AT ( | 430188.78, | 5203015.50, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 0.14365 AT ( | 430192.23, | 5203029.44, | 4.28, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.14351 AT ( | 430188.78, | 5202990.50, | 4.68, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.14316 AT ( | 430188.78, | 5203028.00, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.14300 AT ( | 430190.73, | 5203013.94, | 4.44, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.14278 AT ( | 430190.62, | 5202989.49, | 4.43, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 0.14275 AT ( | 430176.34, | 5203003.00, | 5.28, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        |                       |              |            |             |       |
| EP08   | 1ST HIGHEST VALUE IS  | 1.60925 AT ( | 430194.16, | 5203066.62, | 4.29, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 1.58956 AT ( | 430188.78, | 5203065.00, | 4.67, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 1.58718 AT ( | 430192.87, | 5203041.83, | 4.23, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 1.58701 AT ( | 430188.78, | 5203040.50, | 4.68, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 1.58283 AT ( | 430194.80, | 5203079.01, | 4.42, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 1.57950 AT ( | 430188.78, | 5203077.50, | 4.73, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 1.57592 AT ( | 430193.52, | 5203054.23, | 4.25, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 1.57034 AT ( | 430188.78, | 5203053.00, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 1.56755 AT ( | 430176.34, | 5203065.00, | 5.11, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 1.56368 AT ( | 430176.34, | 5203040.50, | 5.19, |
| 92.43, | 0.00) DC              |              |            |             |       |

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*

\*\*\* 04:30:18

PAGE 22

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 8TH-HIGHEST 24-HR RESULTS  
 AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3  
 \*\*

| GROUP ID      |                       | NETWORK | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |             |       |
|---------------|-----------------------|---------|--------------|--------------------------|-------------|-------|
| ZHILL, ZFLAG) | OF TYPE               | GRID-ID |              |                          |             |       |
| -----         |                       |         |              |                          |             |       |
| -----         |                       |         |              |                          |             |       |
| EP09          | 1ST HIGHEST VALUE IS  |         | 0.30051 AT ( | 430744.02,               | 5203016.94, | 5.14, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 2ND HIGHEST VALUE IS  |         | 0.29091 AT ( | 430738.77,               | 5203027.94, | 5.10, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 3RD HIGHEST VALUE IS  |         | 0.29006 AT ( | 430748.25,               | 5203015.50, | 5.09, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 4TH HIGHEST VALUE IS  |         | 0.27881 AT ( | 430749.27,               | 5203005.94, | 5.13, |
| 5.13,         | 0.00) DC              |         |              |                          |             |       |
|               | 5TH HIGHEST VALUE IS  |         | 0.27168 AT ( | 430731.77,               | 5203037.94, | 5.11, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 6TH HIGHEST VALUE IS  |         | 0.26617 AT ( | 430724.77,               | 5203047.94, | 5.10, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 7TH HIGHEST VALUE IS  |         | 0.26579 AT ( | 430748.25,               | 5203028.00, | 5.07, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 8TH HIGHEST VALUE IS  |         | 0.26252 AT ( | 430760.69,               | 5203015.50, | 5.14, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 9TH HIGHEST VALUE IS  |         | 0.26217 AT ( | 430717.77,               | 5203057.94, | 5.11, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 10TH HIGHEST VALUE IS |         | 0.25704 AT ( | 430723.38,               | 5203053.00, | 5.09, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
| EP10          | 1ST HIGHEST VALUE IS  |         | 1.71868 AT ( | 430715.77,               | 5203067.94, | 5.15, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 2ND HIGHEST VALUE IS  |         | 1.71557 AT ( | 430713.77,               | 5203077.94, | 5.23, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 3RD HIGHEST VALUE IS  |         | 1.64478 AT ( | 430713.80,               | 5203090.14, | 5.09, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 4TH HIGHEST VALUE IS  |         | 1.56359 AT ( | 430713.84,               | 5203102.34, | 5.03, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 5TH HIGHEST VALUE IS  |         | 1.54992 AT ( | 430717.77,               | 5203057.94, | 5.11, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 6TH HIGHEST VALUE IS  |         | 1.54827 AT ( | 430723.38,               | 5203077.50, | 5.13, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 7TH HIGHEST VALUE IS  |         | 1.51863 AT ( | 430723.38,               | 5203090.00, | 5.16, |
| 92.43,        | 0.00) DC              |         |              |                          |             |       |
|               | 8TH HIGHEST VALUE IS  |         | 1.48405 AT ( | 430723.38,               | 5203102.50, | 5.18, |

|        |                       |         |      |            |             |
|--------|-----------------------|---------|------|------------|-------------|
| 92.43, | 0.00) DC              |         |      |            |             |
|        | 9TH HIGHEST VALUE IS  | 1.46610 | AT ( | 430713.87, | 5203114.54, |
| 92.43, | 0.00) DC              |         |      |            | 4.99,       |
|        | 10TH HIGHEST VALUE IS | 1.45963 | AT ( | 430723.38, | 5203065.00, |
| 92.43, | 0.00) DC              |         |      |            | 5.01,       |
| EP11   | 1ST HIGHEST VALUE IS  | 1.51417 | AT ( | 430713.77, | 5203077.94, |
| 92.43, | 0.00) DC              |         |      |            | 5.23,       |
|        | 2ND HIGHEST VALUE IS  | 1.50081 | AT ( | 430715.77, | 5203067.94, |
| 92.43, | 0.00) DC              |         |      |            | 5.15,       |
|        | 3RD HIGHEST VALUE IS  | 1.49223 | AT ( | 430713.80, | 5203090.14, |
| 92.43, | 0.00) DC              |         |      |            | 5.09,       |
|        | 4TH HIGHEST VALUE IS  | 1.44073 | AT ( | 430713.84, | 5203102.34, |
| 92.43, | 0.00) DC              |         |      |            | 5.03,       |
|        | 5TH HIGHEST VALUE IS  | 1.43405 | AT ( | 430723.38, | 5203077.50, |
| 92.43, | 0.00) DC              |         |      |            | 5.13,       |
|        | 6TH HIGHEST VALUE IS  | 1.41788 | AT ( | 430723.38, | 5203102.50, |
| 92.43, | 0.00) DC              |         |      |            | 5.18,       |
|        | 7TH HIGHEST VALUE IS  | 1.41075 | AT ( | 430713.87, | 5203114.54, |
| 92.43, | 0.00) DC              |         |      |            | 4.99,       |
|        | 8TH HIGHEST VALUE IS  | 1.40471 | AT ( | 430723.38, | 5203090.00, |
| 92.43, | 0.00) DC              |         |      |            | 5.16,       |
|        | 9TH HIGHEST VALUE IS  | 1.34814 | AT ( | 430717.77, | 5203057.94, |
| 92.43, | 0.00) DC              |         |      |            | 5.11,       |
|        | 10TH HIGHEST VALUE IS | 1.31532 | AT ( | 430723.38, | 5203065.00, |
| 92.43, | 0.00) DC              |         |      |            | 5.01,       |
| EP12   | 1ST HIGHEST VALUE IS  | 0.58831 | AT ( | 430717.77, | 5203057.94, |
| 92.43, | 0.00) DC              |         |      |            | 5.11,       |
|        | 2ND HIGHEST VALUE IS  | 0.58132 | AT ( | 430715.77, | 5203067.94, |
| 92.43, | 0.00) DC              |         |      |            | 5.15,       |
|        | 3RD HIGHEST VALUE IS  | 0.56482 | AT ( | 430723.38, | 5203053.00, |
| 92.43, | 0.00) DC              |         |      |            | 5.09,       |
|        | 4TH HIGHEST VALUE IS  | 0.56128 | AT ( | 430723.38, | 5203065.00, |
| 92.43, | 0.00) DC              |         |      |            | 5.01,       |
|        | 5TH HIGHEST VALUE IS  | 0.55395 | AT ( | 430723.38, | 5203077.50, |
| 92.43, | 0.00) DC              |         |      |            | 5.13,       |
|        | 6TH HIGHEST VALUE IS  | 0.55004 | AT ( | 430713.77, | 5203077.94, |
| 92.43, | 0.00) DC              |         |      |            | 5.23,       |
|        | 7TH HIGHEST VALUE IS  | 0.53451 | AT ( | 430724.77, | 5203047.94, |
| 92.43, | 0.00) DC              |         |      |            | 5.10,       |
|        | 8TH HIGHEST VALUE IS  | 0.53304 | AT ( | 430797.97, | 5203053.00, |
| 92.43, | 0.00) DC              |         |      |            | 6.12,       |
|        | 9TH HIGHEST VALUE IS  | 0.53059 | AT ( | 430785.53, | 5203053.00, |
| 92.43, | 0.00) DC              |         |      |            | 5.88,       |
|        | 10TH HIGHEST VALUE IS | 0.52897 | AT ( | 430785.53, | 5203065.00, |
| 92.43, | 0.00) DC              |         |      |            | 5.88,       |

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*

07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\*  
\*\*\* 04:30:18

PAGE 23  
\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 8TH-HIGHEST 24-HR RESULTS  
AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3  
\*\*

| GROUP ID      | NETWORK               | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV,     |
|---------------|-----------------------|--------------|------------------------------|
| ZHILL, ZFLAG) | OF TYPE GRID-ID       |              |                              |
| - - - - -     | - - - - -             | - - - - -    | - - - - -                    |
| - - - - -     | - - - - -             | - - - - -    | - - - - -                    |
| EP13          | 1ST HIGHEST VALUE IS  | 1.72239 AT ( | 430713.80, 5203090.14, 5.09, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 2ND HIGHEST VALUE IS  | 1.71009 AT ( | 430713.77, 5203077.94, 5.23, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 3RD HIGHEST VALUE IS  | 1.69055 AT ( | 430715.77, 5203067.94, 5.15, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 4TH HIGHEST VALUE IS  | 1.66777 AT ( | 430713.84, 5203102.34, 5.03, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 5TH HIGHEST VALUE IS  | 1.61029 AT ( | 430713.87, 5203114.54, 4.99, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 6TH HIGHEST VALUE IS  | 1.55793 AT ( | 430723.38, 5203090.00, 5.16, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 7TH HIGHEST VALUE IS  | 1.54975 AT ( | 430723.38, 5203077.50, 5.13, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 8TH HIGHEST VALUE IS  | 1.54806 AT ( | 430723.38, 5203102.50, 5.18, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 9TH HIGHEST VALUE IS  | 1.51129 AT ( | 430717.77, 5203057.94, 5.11, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 10TH HIGHEST VALUE IS | 1.50061 AT ( | 430713.90, 5203126.74, 4.97, |
| 92.43,        | 0.00) DC              |              |                              |
| EP14          | 1ST HIGHEST VALUE IS  | 1.48910 AT ( | 430713.80, 5203090.14, 5.09, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 2ND HIGHEST VALUE IS  | 1.48774 AT ( | 430713.84, 5203102.34, 5.03, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 3RD HIGHEST VALUE IS  | 1.44494 AT ( | 430713.77, 5203077.94, 5.23, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 4TH HIGHEST VALUE IS  | 1.42829 AT ( | 430713.87, 5203114.54, 4.99, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 5TH HIGHEST VALUE IS  | 1.41192 AT ( | 430723.38, 5203102.50, 5.18, |

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| 92.43, | 0.00) DC              | 1.37980 AT ( | 430723.38, | 5203090.00, | 5.16, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 1.37804 AT ( | 430715.77, | 5203067.94, | 5.15, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 1.35201 AT ( | 430713.90, | 5203126.74, | 4.97, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 1.32779 AT ( | 430723.38, | 5203077.50, | 5.13, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 1.32078 AT ( | 430723.38, | 5203115.00, | 5.09, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS |              |            |             |       |
| FEL_P1 | 1ST HIGHEST VALUE IS  | 2.30339 AT ( | 430197.37, | 5203128.59, | 4.30, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 2.28460 AT ( | 430196.73, | 5203116.20, | 4.25, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 2.21973 AT ( | 430188.78, | 5203127.50, | 4.71, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 2.20864 AT ( | 430188.78, | 5203115.00, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 2.20714 AT ( | 430196.09, | 5203103.80, | 4.32, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 2.16934 AT ( | 430198.02, | 5203140.98, | 4.33, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 2.14117 AT ( | 430188.78, | 5203102.50, | 4.73, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 2.11679 AT ( | 430195.44, | 5203091.41, | 4.39, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 2.09564 AT ( | 430188.78, | 5203140.00, | 4.72, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 2.06887 AT ( | 430188.78, | 5203090.00, | 4.72, |
| 92.43, | 0.00) DC              |              |            |             |       |
| FEL_P2 | 1ST HIGHEST VALUE IS  | 1.17965 AT ( | 430193.52, | 5203054.23, | 4.25, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 1.17095 AT ( | 430192.87, | 5203041.83, | 4.23, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 1.16439 AT ( | 430188.78, | 5203053.00, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 1.15240 AT ( | 430188.78, | 5203040.50, | 4.68, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 1.13244 AT ( | 430192.23, | 5203029.44, | 4.28, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 1.13096 AT ( | 430188.78, | 5203028.00, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 1.11313 AT ( | 430191.48, | 5203021.69, | 4.36, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 1.11145 AT ( | 430194.16, | 5203066.62, | 4.29, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 1.09887 AT ( | 430188.78, | 5203015.50, | 4.70, |



92.43, 0.00) DC  
10TH HIGHEST VALUE IS 1.09837 AT ( 430188.78, 5203065.00, 4.67,  
92.43, 0.00) DC

\*\*\* AERMOD - VERSION 22112 \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\*  
\*\*\* 04:30:18

PAGE 24

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 8TH-HIGHEST 24-HR RESULTS  
AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID      | NETWORK         | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |
|---------------|-----------------|--------------|--------------------------|
| ZHILL, ZFLAG) | OF TYPE GRID-ID |              |                          |
| - - - - -     | - - - - -       | - - - - -    | - - - - -                |
| - - - - -     | - - - - -       | - - - - -    | - - - - -                |

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| FEL_P3 | 1ST HIGHEST VALUE IS  | 0.92351 AT ( | 430190.45, | 5202952.82, | 5.21, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 0.92230 AT ( | 430190.56, | 5202977.27, | 4.52, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.91903 AT ( | 430188.78, | 5202978.00, | 4.73, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.91609 AT ( | 430188.78, | 5202953.50, | 5.22, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 0.91121 AT ( | 430190.51, | 5202965.05, | 4.56, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.91028 AT ( | 430188.78, | 5202965.50, | 4.77, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.88502 AT ( | 430190.40, | 5202940.60, | 4.77, |
| 5.44,  | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.88252 AT ( | 430188.78, | 5202941.00, | 4.95, |
| 4.95,  | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.86753 AT ( | 430190.62, | 5202989.49, | 4.43, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 0.85958 AT ( | 430188.78, | 5202990.50, | 4.68, |
| 92.43, | 0.00) DC              |              |            |             |       |

|        |                      |              |            |             |       |
|--------|----------------------|--------------|------------|-------------|-------|
| LOAD_P | 1ST HIGHEST VALUE IS | 0.01785 AT ( | 430194.16, | 5203066.62, | 4.29, |
| 92.43, | 0.00) DC             |              |            |             |       |
|        | 2ND HIGHEST VALUE IS | 0.01770 AT ( | 430713.87, | 5203114.54, | 4.99, |

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| 92.43, | 0.00) DC              | 0.01766 AT ( | 430194.80, | 5203079.01, | 4.42, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.01763 AT ( | 430191.48, | 5203021.69, | 4.36, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.01759 AT ( | 430192.23, | 5203029.44, | 4.28, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 0.01756 AT ( | 430190.73, | 5203013.94, | 4.44, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.01755 AT ( | 430713.84, | 5203102.34, | 5.03, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.01746 AT ( | 430190.62, | 5202989.49, | 4.43, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.01743 AT ( | 430188.78, | 5203065.00, | 4.67, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.01740 AT ( | 430195.44, | 5203091.41, | 4.39, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS |              |            |             |       |
| 92.43, | 0.00) DC              |              |            |             |       |
| PILE1  | 1ST HIGHEST VALUE IS  | 3.01610 AT ( | 430198.66, | 5203153.38, | 4.42, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 2.94220 AT ( | 430199.30, | 5203165.77, | 4.48, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 2.84990 AT ( | 430198.02, | 5203140.98, | 4.33, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 2.77988 AT ( | 430188.78, | 5203152.00, | 4.73, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 2.72652 AT ( | 430199.94, | 5203178.16, | 4.29, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 2.71787 AT ( | 430188.78, | 5203140.00, | 4.72, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 2.71455 AT ( | 430188.78, | 5203164.50, | 4.71, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 2.61844 AT ( | 430197.37, | 5203128.59, | 4.30, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 2.57490 AT ( | 430188.78, | 5203177.00, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 2.51565 AT ( | 430188.78, | 5203127.50, | 4.71, |
| 92.43, | 0.00) DC              |              |            |             |       |
| PILE2  | 1ST HIGHEST VALUE IS  | 3.67291 AT ( | 430188.78, | 5203028.00, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 3.66359 AT ( | 430192.23, | 5203029.44, | 4.28, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 3.53450 AT ( | 430191.48, | 5203021.69, | 4.36, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 3.45087 AT ( | 430188.78, | 5203015.50, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 3.40786 AT ( | 430190.73, | 5203013.94, | 4.44, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 3.40130 AT ( | 430188.78, | 5203040.50, | 4.68, |

92.43, 0.00) DC  
 7TH HIGHEST VALUE IS 3.35828 AT ( 430192.87, 5203041.83, 4.23,  
 92.43, 0.00) DC  
 8TH HIGHEST VALUE IS 3.29274 AT ( 430176.34, 5203028.00, 5.19,  
 92.43, 0.00) DC  
 9TH HIGHEST VALUE IS 3.23393 AT ( 430176.34, 5203015.50, 5.23,  
 92.43, 0.00) DC  
 10TH HIGHEST VALUE IS 3.15753 AT ( 430188.78, 5203003.00, 4.68,  
 92.43, 0.00) DC

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
 07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*  
 \*\*\* 04:30:18

PAGE 25

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 8TH-HIGHEST 24-HR RESULTS  
 AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID              | NETWORK   | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |
|-----------------------|-----------|--------------|--------------------------|
| ZHILL, ZFLAG) OF TYPE | GRID-ID   |              |                          |
| - - - - -             | - - - - - | - - - - -    | - - - - -                |
| - - - - -             | - - - - - | - - - - -    | - - - - -                |

|        |                      |              |            |             |       |
|--------|----------------------|--------------|------------|-------------|-------|
| PILE3  | 1ST HIGHEST VALUE IS | 3.45502 AT ( | 430190.40, | 5202940.60, | 4.77, |
| 5.44,  | 0.00) DC             |              |            |             |       |
|        | 2ND HIGHEST VALUE IS | 3.43192 AT ( | 430188.78, | 5202941.00, | 4.95, |
| 4.95,  | 0.00) DC             |              |            |             |       |
|        | 3RD HIGHEST VALUE IS | 3.41337 AT ( | 430190.45, | 5202952.82, | 5.21, |
| 92.43, | 0.00) DC             |              |            |             |       |
|        | 4TH HIGHEST VALUE IS | 3.32402 AT ( | 430188.78, | 5202953.50, | 5.22, |
| 92.43, | 0.00) DC             |              |            |             |       |
|        | 5TH HIGHEST VALUE IS | 3.28358 AT ( | 430188.78, | 5202928.50, | 4.81, |
| 5.40,  | 0.00) DC             |              |            |             |       |
|        | 6TH HIGHEST VALUE IS | 3.27687 AT ( | 430190.34, | 5202928.38, | 4.63, |
| 5.40,  | 0.00) DC             |              |            |             |       |
|        | 7TH HIGHEST VALUE IS | 3.11544 AT ( | 430176.34, | 5202941.00, | 5.52, |
| 5.52,  | 0.00) DC             |              |            |             |       |
|        | 8TH HIGHEST VALUE IS | 3.04531 AT ( | 430176.34, | 5202928.50, | 5.54, |
| 5.54,  | 0.00) DC             |              |            |             |       |
|        | 9TH HIGHEST VALUE IS | 2.98485 AT ( | 430188.78, | 5202916.00, | 4.78, |
| 4.78,  | 0.00) DC             |              |            |             |       |

|        |                                         |              |            |             |       |
|--------|-----------------------------------------|--------------|------------|-------------|-------|
|        | 10TH HIGHEST VALUE IS<br>5.41, 0.00) DC | 2.97654 AT ( | 430190.29, | 5202916.15, | 4.59, |
| T_P    | 1ST HIGHEST VALUE IS<br>5.67, 0.00) DC  | 0.16068 AT ( | 430401.24, | 5202869.68, | 5.67, |
|        | 2ND HIGHEST VALUE IS<br>5.93, 0.00) DC  | 0.15292 AT ( | 430400.13, | 5202866.50, | 5.93, |
|        | 3RD HIGHEST VALUE IS<br>5.49, 0.00) DC  | 0.13853 AT ( | 430389.49, | 5202871.55, | 5.49, |
|        | 4TH HIGHEST VALUE IS<br>5.92, 0.00) DC  | 0.13065 AT ( | 430387.69, | 5202866.50, | 5.92, |
|        | 5TH HIGHEST VALUE IS<br>5.40, 0.00) DC  | 0.12371 AT ( | 430377.74, | 5202873.43, | 5.40, |
|        | 6TH HIGHEST VALUE IS<br>6.02, 0.00) DC  | 0.12044 AT ( | 430424.74, | 5202865.93, | 6.02, |
|        | 7TH HIGHEST VALUE IS<br>5.23, 0.00) DC  | 0.11697 AT ( | 430371.74, | 5202875.68, | 5.23, |
|        | 8TH HIGHEST VALUE IS<br>5.16, 0.00) DC  | 0.11612 AT ( | 430365.74, | 5202877.93, | 5.16, |
|        | 9TH HIGHEST VALUE IS<br>5.91, 0.00) DC  | 0.11453 AT ( | 430375.28, | 5202866.50, | 5.91, |
|        | 10TH HIGHEST VALUE IS<br>5.95, 0.00) DC | 0.10920 AT ( | 430412.99, | 5202867.80, | 5.95, |
| T_P1   | 1ST HIGHEST VALUE IS<br>92.43, 0.00) DC | 0.97521 AT ( | 430196.73, | 5203116.20, | 4.25, |
|        | 2ND HIGHEST VALUE IS<br>92.43, 0.00) DC | 0.88528 AT ( | 430188.78, | 5203115.00, | 4.70, |
|        | 3RD HIGHEST VALUE IS<br>92.43, 0.00) DC | 0.86733 AT ( | 430196.09, | 5203103.80, | 4.32, |
|        | 4TH HIGHEST VALUE IS<br>92.43, 0.00) DC | 0.82917 AT ( | 430188.78, | 5203102.50, | 4.73, |
|        | 5TH HIGHEST VALUE IS<br>92.43, 0.00) DC | 0.77208 AT ( | 430195.44, | 5203091.41, | 4.39, |
|        | 6TH HIGHEST VALUE IS<br>92.43, 0.00) DC | 0.75323 AT ( | 430188.78, | 5203090.00, | 4.72, |
|        | 7TH HIGHEST VALUE IS<br>92.43, 0.00) DC | 0.73073 AT ( | 430176.34, | 5203115.00, | 4.96, |
|        | 8TH HIGHEST VALUE IS<br>92.43, 0.00) DC | 0.72912 AT ( | 430176.34, | 5203102.50, | 5.00, |
|        | 9TH HIGHEST VALUE IS<br>5.41, 0.00) DC  | 0.72633 AT ( | 430190.29, | 5202916.15, | 4.59, |
|        | 10TH HIGHEST VALUE IS<br>4.78, 0.00) DC | 0.72601 AT ( | 430188.78, | 5202916.00, | 4.78, |
| T_P1EX | 1ST HIGHEST VALUE IS<br>92.43, 0.00) DC | 0.67576 AT ( | 430210.43, | 5203290.86, | 4.37, |
|        | 2ND HIGHEST VALUE IS<br>92.43, 0.00) DC | 0.63449 AT ( | 430201.22, | 5203289.00, | 3.87, |
|        | 3RD HIGHEST VALUE IS                    | 0.62878 AT ( | 430204.93, | 5203229.55, | 4.37, |

92.43, 0.00) DC  
 4TH HIGHEST VALUE IS 0.62223 AT ( 430204.83, 5203219.25, 4.33,  
 92.43, 0.00) DC  
 5TH HIGHEST VALUE IS 0.59575 AT ( 430204.73, 5203208.95, 4.43,  
 92.43, 0.00) DC  
 6TH HIGHEST VALUE IS 0.59547 AT ( 430205.03, 5203239.85, 4.31,  
 92.43, 0.00) DC  
 7TH HIGHEST VALUE IS 0.59524 AT ( 430201.22, 5203227.00, 4.18,  
 92.43, 0.00) DC  
 8TH HIGHEST VALUE IS 0.58040 AT ( 430210.73, 5203279.46, 4.32,  
 92.43, 0.00) DC  
 9TH HIGHEST VALUE IS 0.57877 AT ( 430201.22, 5203214.50, 4.09,  
 92.43, 0.00) DC  
 10TH HIGHEST VALUE IS 0.56342 AT ( 430201.22, 5203239.50, 4.05,  
 92.43, 0.00) DC

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
 07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*

\*\*\* 04:30:18

PAGE 26

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 8TH-HIGHEST 24-HR RESULTS  
 AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID      | NETWORK         | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |
|---------------|-----------------|--------------|--------------------------|
| ZHILL, ZFLAG) | OF TYPE GRID-ID |              |                          |
| - - - - -     | - - - - -       | - - - - -    | - - - - -                |
| - - - - -     | - - - - -       | - - - - -    | - - - - -                |

T\_P2 1ST HIGHEST VALUE IS 0.53300 AT ( 430194.80, 5203079.01, 4.42,  
 92.43, 0.00) DC  
 2ND HIGHEST VALUE IS 0.49363 AT ( 430188.78, 5203077.50, 4.73,  
 92.43, 0.00) DC  
 3RD HIGHEST VALUE IS 0.47175 AT ( 430194.16, 5203066.62, 4.29,  
 92.43, 0.00) DC  
 4TH HIGHEST VALUE IS 0.45895 AT ( 430188.78, 5203065.00, 4.67,  
 92.43, 0.00) DC  
 5TH HIGHEST VALUE IS 0.42307 AT ( 430193.52, 5203054.23, 4.25,  
 92.43, 0.00) DC  
 6TH HIGHEST VALUE IS 0.41925 AT ( 430188.78, 5203053.00, 4.70,  
 92.43, 0.00) DC

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| 92.43, | 7TH HIGHEST VALUE IS  | 0.40773 AT ( | 430176.34, | 5203077.50, | 5.06, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 8TH HIGHEST VALUE IS  | 0.40762 AT ( | 430176.34, | 5203065.00, | 5.11, |
|        | 0.00) DC              |              |            |             |       |
| 5.41,  | 9TH HIGHEST VALUE IS  | 0.40142 AT ( | 430190.29, | 5202916.15, | 4.59, |
|        | 0.00) DC              |              |            |             |       |
| 4.78,  | 10TH HIGHEST VALUE IS | 0.40050 AT ( | 430188.78, | 5202916.00, | 4.78, |
|        | 0.00) DC              |              |            |             |       |
| T_P2EX | 1ST HIGHEST VALUE IS  | 0.37290 AT ( | 430201.22, | 5203289.00, | 3.87, |
| 92.43, | 0.00) DC              |              |            |             |       |
| 92.43, | 2ND HIGHEST VALUE IS  | 0.34898 AT ( | 430210.43, | 5203290.86, | 4.37, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 3RD HIGHEST VALUE IS  | 0.34722 AT ( | 430204.93, | 5203229.55, | 4.37, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 4TH HIGHEST VALUE IS  | 0.34205 AT ( | 430204.83, | 5203219.25, | 4.33, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 5TH HIGHEST VALUE IS  | 0.33003 AT ( | 430201.22, | 5203227.00, | 4.18, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 6TH HIGHEST VALUE IS  | 0.32926 AT ( | 430204.73, | 5203208.95, | 4.43, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 7TH HIGHEST VALUE IS  | 0.32905 AT ( | 430205.03, | 5203239.85, | 4.31, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 8TH HIGHEST VALUE IS  | 0.32502 AT ( | 430210.73, | 5203279.46, | 4.32, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 9TH HIGHEST VALUE IS  | 0.32078 AT ( | 430201.22, | 5203214.50, | 4.09, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 10TH HIGHEST VALUE IS | 0.31387 AT ( | 430188.78, | 5203289.00, | 5.02, |
|        | 0.00) DC              |              |            |             |       |
| T_P3   | 1ST HIGHEST VALUE IS  | 0.46361 AT ( | 430188.78, | 5202990.50, | 4.68, |
| 92.43, | 0.00) DC              |              |            |             |       |
| 92.43, | 2ND HIGHEST VALUE IS  | 0.45580 AT ( | 430190.62, | 5202989.49, | 4.43, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 3RD HIGHEST VALUE IS  | 0.43497 AT ( | 430190.67, | 5203001.72, | 4.41, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 4TH HIGHEST VALUE IS  | 0.41352 AT ( | 430176.34, | 5202990.50, | 5.33, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 5TH HIGHEST VALUE IS  | 0.41294 AT ( | 430188.78, | 5203003.00, | 4.68, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 6TH HIGHEST VALUE IS  | 0.39732 AT ( | 430188.78, | 5202978.00, | 4.73, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 7TH HIGHEST VALUE IS  | 0.39113 AT ( | 430190.56, | 5202977.27, | 4.52, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 8TH HIGHEST VALUE IS  | 0.37948 AT ( | 430176.34, | 5202978.00, | 5.39, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 9TH HIGHEST VALUE IS  | 0.35982 AT ( | 430176.34, | 5203003.00, | 5.28, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 10TH HIGHEST VALUE IS | 0.34952 AT ( | 430188.78, | 5202965.50, | 4.77, |
|        | 0.00) DC              |              |            |             |       |

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| T_P3EX | 1ST HIGHEST VALUE IS  | 0.27880 AT ( | 430204.93, | 5203229.55, | 4.37, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 0.27443 AT ( | 430210.43, | 5203290.86, | 4.37, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.27091 AT ( | 430204.83, | 5203219.25, | 4.33, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.26528 AT ( | 430201.22, | 5203289.00, | 3.87, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 0.26407 AT ( | 430201.22, | 5203227.00, | 4.18, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.26396 AT ( | 430205.03, | 5203239.85, | 4.31, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.26231 AT ( | 430204.73, | 5203208.95, | 4.43, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.25383 AT ( | 430210.73, | 5203279.46, | 4.32, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.25371 AT ( | 430201.22, | 5203214.50, | 4.09, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 0.24931 AT ( | 430201.22, | 5203239.50, | 4.05, |
| 92.43, | 0.00) DC              |              |            |             |       |

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*

07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*

\*\*\*

04:30:18

PAGE 27

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM 8TH-HIGHEST 24-HR RESULTS  
AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

|               |         | NETWORK      |                          |  |  |
|---------------|---------|--------------|--------------------------|--|--|
| GROUP ID      |         | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |  |  |
| ZHILL, ZFLAG) | OF TYPE | GRID-ID      |                          |  |  |
| -----         |         |              |                          |  |  |
| -----         |         |              |                          |  |  |

|        |                      |              |            |             |       |
|--------|----------------------|--------------|------------|-------------|-------|
| T_PEX  | 1ST HIGHEST VALUE IS | 0.45123 AT ( | 430210.43, | 5203290.86, | 4.37, |
| 92.43, | 0.00) DC             |              |            |             |       |
|        | 2ND HIGHEST VALUE IS | 0.43622 AT ( | 430201.22, | 5203289.00, | 3.87, |
| 92.43, | 0.00) DC             |              |            |             |       |
|        | 3RD HIGHEST VALUE IS | 0.37705 AT ( | 430210.73, | 5203279.46, | 4.32, |
| 92.43, | 0.00) DC             |              |            |             |       |



|        |                       |               |            |             |       |
|--------|-----------------------|---------------|------------|-------------|-------|
| 92.43, | 4TH HIGHEST VALUE IS  | 0.35457 AT (  | 430188.78, | 5203289.00, | 5.02, |
|        | 0.00) DC              |               |            |             |       |
| 92.43, | 5TH HIGHEST VALUE IS  | 0.32510 AT (  | 430201.22, | 5203276.50, | 3.94, |
|        | 0.00) DC              |               |            |             |       |
| 92.43, | 6TH HIGHEST VALUE IS  | 0.30917 AT (  | 430201.22, | 5203301.50, | 3.49, |
|        | 0.00) DC              |               |            |             |       |
| 92.43, | 7TH HIGHEST VALUE IS  | 0.30380 AT (  | 430210.13, | 5203302.26, | 3.15, |
|        | 0.00) DC              |               |            |             |       |
| 92.43, | 8TH HIGHEST VALUE IS  | 0.30081 AT (  | 430188.78, | 5203276.50, | 4.92, |
|        | 0.00) DC              |               |            |             |       |
| 92.43, | 9TH HIGHEST VALUE IS  | 0.29621 AT (  | 430176.34, | 5203289.00, | 4.43, |
|        | 0.00) DC              |               |            |             |       |
| 92.43, | 10TH HIGHEST VALUE IS | 0.29520 AT (  | 430188.78, | 5203301.50, | 5.13, |
|        | 0.00) DC              |               |            |             |       |
| ALL    | 1ST HIGHEST VALUE IS  | 11.58601 AT ( | 430188.78, | 5203028.00, | 4.70, |
| 92.43, | 0.00) DC              |               |            |             |       |
| 92.43, | 2ND HIGHEST VALUE IS  | 11.53046 AT ( | 430192.23, | 5203029.44, | 4.28, |
|        | 0.00) DC              |               |            |             |       |
| 92.43, | 3RD HIGHEST VALUE IS  | 11.45455 AT ( | 430188.78, | 5203040.50, | 4.68, |
|        | 0.00) DC              |               |            |             |       |
| 92.43, | 4TH HIGHEST VALUE IS  | 11.35663 AT ( | 430192.87, | 5203041.83, | 4.23, |
|        | 0.00) DC              |               |            |             |       |
| 92.43, | 5TH HIGHEST VALUE IS  | 11.35518 AT ( | 430191.48, | 5203021.69, | 4.36, |
|        | 0.00) DC              |               |            |             |       |
| 92.43, | 6TH HIGHEST VALUE IS  | 11.25114 AT ( | 430188.78, | 5203053.00, | 4.70, |
|        | 0.00) DC              |               |            |             |       |
| 92.43, | 7TH HIGHEST VALUE IS  | 11.22254 AT ( | 430176.34, | 5203028.00, | 5.19, |
|        | 0.00) DC              |               |            |             |       |
| 92.43, | 8TH HIGHEST VALUE IS  | 11.19461 AT ( | 430188.78, | 5203015.50, | 4.70, |
|        | 0.00) DC              |               |            |             |       |
| 92.43, | 9TH HIGHEST VALUE IS  | 11.14072 AT ( | 430176.34, | 5203040.50, | 5.19, |
|        | 0.00) DC              |               |            |             |       |
| 92.43, | 10TH HIGHEST VALUE IS | 11.12400 AT ( | 430193.52, | 5203054.23, | 4.25, |
|        | 0.00) DC              |               |            |             |       |

\*\*\* RECEPTOR TYPES: GC = GRIDCART  
GP = GRIDPOLR  
DC = DISCCART  
DP = DISCPOLR

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/14/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*  
\*\*\* 04:30:18

PAGE 28

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* Message Summary : AERMOD Model Execution \*\*\*

----- Summary of Total Messages -----

A Total of                0 Fatal Error Message(s)  
A Total of                22 Warning Message(s)  
A Total of                758 Informational Message(s)  
  
A Total of                43824 Hours Were Processed  
  
A Total of                398 Calm Hours Identified  
  
A Total of                360 Missing Hours Identified ( 0.82 Percent)

\*\*\*\*\* FATAL ERROR MESSAGES \*\*\*\*\*  
\*\*\* NONE \*\*\*

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*  
SO W320     1503            PPARM: Input Parameter May Be Out-of-Range for Parameter  
          VS  
ME W187     13687           MEOPEN: ADJ\_U\* Option for Stable Low Winds used in AERMET  
  
OU W565     13768           OUPLOT: Possible Conflict With Dynamically Allocated FUNIT  
PLOTFILE  
OU W565     13769           OUPLOT: Possible Conflict With Dynamically Allocated FUNIT  
PLOTFILE  
OU W565     13770           OUPLOT: Possible Conflict With Dynamically Allocated FUNIT  
PLOTFILE  
OU W565     13771           OUPLOT: Possible Conflict With Dynamically Allocated FUNIT  
PLOTFILE  
OU W565     13772           OUPLOT: Possible Conflict With Dynamically Allocated FUNIT  
PLOTFILE  
OU W565     13773           OUPLOT: Possible Conflict With Dynamically Allocated FUNIT  
PLOTFILE  
OU W565     13774           OUPLOT: Possible Conflict With Dynamically Allocated FUNIT  
PLOTFILE  
OU W565     13775           OUPLOT: Possible Conflict With Dynamically Allocated FUNIT  
PLOTFILE  
OU W565     13776           OUPLOT: Possible Conflict With Dynamically Allocated FUNIT  
PLOTFILE  
OU W565     13777           OUPLOT: Possible Conflict With Dynamically Allocated FUNIT  
PLOTFILE  
OU W565     13778           OUPLOT: Possible Conflict With Dynamically Allocated FUNIT  
PLOTFILE  
OU W565     13779           OUPLOT: Possible Conflict With Dynamically Allocated FUNIT  
PLOTFILE  
OU W565     13780           OUPLOT: Possible Conflict With Dynamically Allocated FUNIT  
PLOTFILE

|                     |       |                                                             |
|---------------------|-------|-------------------------------------------------------------|
| OU W565<br>PLOTFILE | 13781 | OU PLOT: Possible Conflict With Dynamically Allocated FUNIT |
| OU W565<br>PLOTFILE | 13782 | OU PLOT: Possible Conflict With Dynamically Allocated FUNIT |
| OU W565<br>PLOTFILE | 13783 | OU PLOT: Possible Conflict With Dynamically Allocated FUNIT |
| OU W565<br>PLOTFILE | 13784 | OU PLOT: Possible Conflict With Dynamically Allocated FUNIT |
| OU W565<br>PLOTFILE | 13785 | OU PLOT: Possible Conflict With Dynamically Allocated FUNIT |
| OU W565<br>PLOTFILE | 13786 | OU PLOT: Possible Conflict With Dynamically Allocated FUNIT |
| OU W565<br>PLOTFILE | 13787 | OU PLOT: Possible Conflict With Dynamically Allocated FUNIT |

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/12/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*  
\*\*\* 17:53:29

PAGE 1

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* MODEL SETUP OPTIONS SUMMARY

\*\*\*

- - - - -  
- - - - -

\*\* Model Options Selected:

- \* Model Allows User-Specified Options
- \* Model Is Setup For Calculation of Average CONCentration Values.
- \* NO GAS DEPOSITION Data Provided.
- \* NO PARTICLE DEPOSITION Data Provided.
- \* Model Uses NO DRY DEPLETION. DDPLETE = F
- \* Model Uses NO WET DEPLETION. WETDPLT = F
- \* Stack-tip Downwash.
- \* Model Accounts for ELEVated Terrain Effects.
- \* Use Calms Processing Routine.
- \* Use Missing Data Processing Routine.
- \* No Exponential Decay.
- \* Model Uses RURAL Dispersion Only.
- \* Option for Capped & Horiz Stacks Selected With:
  - 0 Capped Stack(s); and 3 Horizontal Stack(s)
- \* ADJ\_U\* - Use ADJ\_U\* option for SBL in AERMET
- \* CCVR\_Sub - Meteorological data includes CCVR substitutions
- \* TEMP\_Sub - Meteorological data includes TEMP substitutions
- \* Model Assumes No FLAGPOLE Receptor Heights.
- \* The User Specified a Pollutant Type of: PM-2.5

\*\*Note that special processing requirements apply for the 24-hour PM2.5 NAAQS -  
check available guidance.

Model will process user-specified ranks of high 24-hour values averaged across  
the number of years modeled, and

the multi-year average of individual ANNUAL values, averaged across the number of  
years modeled.

\*\*Model Calculates ANNUAL Averages Only

\*\*This Run Includes: 652 Source(s); 30 Source Group(s); and 11358  
Receptor(s)

with: 14 POINT(s), including  
0 POINTCAP(s) and 3 POINTHOR(s)  
and: 635 VOLUME source(s)

and: 3 AREA type source(s)  
and: 0 LINE source(s)  
and: 0 RLINE/RLINEXT source(s)  
and: 0 OPENPIT source(s)  
and: 0 BUOYANT LINE source(s) with a total of 0 line(s)  
and: 0 SWPOINT source(s)

\*\*Model Set To Continue RUNning After the Setup Testing.

\*\*The AERMET Input Meteorological Data Version Date: 22112

\*\*Output Options Selected:

Model Outputs Tables of ANNUAL Averages by Receptor

Model Outputs External File(s) of High Values for Plotting (PLOTFILE  
Keyword)

Model Outputs Separate Summary File of High Ranked Values (SUMMFILE  
Keyword)

\*\*NOTE: The Following Flags May Appear Following CONC Values: c for Calm Hours  
m for Missing Hours  
b for Both Calm and  
Missing Hours

\*\*Misc. Inputs: Base Elev. for Pot. Temp. Profile (m MSL) = 5.50 ; Decay  
Coef. = 0.000 ; Rot. Angle = 0.0  
Emission Units = GRAMS/SEC ;  
Emission Rate Unit Factor = 0.10000E+07  
Output Units = MICROGRAMS/M\*\*3

\*\*Approximate Storage Requirements of Model = 20.1 MB of RAM.

\*\*Input Runstream File: aermod.inp

\*\*Output Print File: aermod.out

\*\*Detailed Error/Message File: HOQUIAMPROJECT\_PM2P5\_ANNUAL.ERR

\*\*File for Summary of Results: HOQUIAMPROJECT\_PM2P5\_ANNUAL.SUM

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/12/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*

\*\*\* 17:53:29

PAGE 2

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* METEOROLOGICAL DAYS SELECTED FOR

(1=YES; 0=NO)

[illegible]

NOTE: METEOROLOGICAL DATA ACTUALLY PROCESSED WILL ALSO DEPEND ON WHAT IS INCLUDED IN THE DATA FILE.

\*\*\* UPPER BOUND OF FIRST THROUGH FIFTH WIND SPEED CATEGORIES \*\*\*

(METERS/SEC)

1.54, 3.09, 5.14, 8.23,

10.80,

\*\*\* AERMOD - VERSION 22112 \*\*\*

C:\MODEL\HOOUIAMPROJECT\HOOUIAMPROJECT PM2P5-ANNUAL\HOOUIAMPROJECT P \*\*\*

07/12/23

\*\*\* AERMET - VERSION 22112 \*\*\*

\*\*\* 17:53:29

PAGE 3

\*\*\* MODELOPTs:      CONC    ELEV    RURAL    ADJ   U\*

\*\*\* UP TO THE FIRST 24 HOURS OF METEOROLOGICAL

DATA \*\*\*

Surface file: KHQM.5Y.SFC

Met Version: 22112

Profile file: KHQM.5Y.PFL

Surface format: FREE

Profile format: FREE

Surface station no.: 94225  
Name: BOWERMAN\_AIRPORT

Upper air station no.: 72797  
Name: QUILLAYUTE

Year: 2018

Year: 2018

First 24 hours of scalar data

| YR     | MO   | DY  | JDY  | HR    | H0    | U*    | W*     | DT/DZ  | ZICNV | ZIMCH | M-O    | LEN  | Z0   | BOWEN |
|--------|------|-----|------|-------|-------|-------|--------|--------|-------|-------|--------|------|------|-------|
| ALBEDO | REF  | WS  | WD   | HT    | REF   | TA    | HT     |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 01    | -33.0 | 0.317 | -9.000 | -9.000 | -999. | 429.  | 110.6  | 0.01 | 0.28 |       |
| 1.00   | 5.51 | 67. | 10.0 | 275.9 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 02    | -42.0 | 0.403 | -9.000 | -9.000 | -999. | 614.  | 178.7  | 0.07 | 0.28 |       |
| 1.00   | 5.10 | 51. | 10.0 | 275.3 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 03    | -42.5 | 0.408 | -9.000 | -9.000 | -999. | 625.  | 183.1  | 0.07 | 0.28 |       |
| 1.00   | 5.16 | 54. | 10.0 | 275.3 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 04    | -35.4 | 0.339 | -9.000 | -9.000 | -999. | 477.  | 126.4  | 0.07 | 0.28 |       |
| 1.00   | 4.32 | 50. | 10.0 | 275.3 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 05    | -35.2 | 0.337 | -9.000 | -9.000 | -999. | 469.  | 124.6  | 0.07 | 0.28 |       |
| 1.00   | 4.29 | 58. | 10.0 | 274.8 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 06    | -36.6 | 0.350 | -9.000 | -9.000 | -999. | 498.  | 135.1  | 0.07 | 0.28 |       |
| 1.00   | 4.46 | 50. | 10.0 | 274.8 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 07    | -32.7 | 0.340 | -9.000 | -9.000 | -999. | 475.  | 126.8  | 0.07 | 0.28 |       |
| 0.58   | 4.32 | 51. | 10.0 | 274.8 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 08    | -0.5  | 0.283 | -9.000 | -9.000 | -999. | 363.  | 4158.0 | 0.01 | 0.28 |       |
| 0.35   | 4.71 | 62. | 10.0 | 276.4 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 09    | 14.1  | 0.378 | 0.287  | 0.007  | 61.   | 558.  | -351.0 | 0.01 | 0.28 |       |
| 0.26   | 6.19 | 68. | 10.0 | 277.5 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 10    | 23.1  | 0.354 | 0.427  | 0.008  | 123.  | 506.  | -175.6 | 0.01 | 0.28 |       |
| 0.22   | 5.72 | 63. | 10.0 | 278.8 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 11    | 25.3  | 0.448 | 0.480  | 0.010  | 160.  | 720.  | -325.6 | 0.01 | 0.28 |       |
| 0.21   | 7.33 | 72. | 10.0 | 279.2 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 12    | 20.7  | 0.394 | 0.464  | 0.008  | 176.  | 597.  | -270.7 | 0.01 | 0.28 |       |
| 0.23   | 6.43 | 65. | 10.0 | 280.3 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 13    | 9.6   | 0.397 | 0.365  | 0.008  | 184.  | 599.  | -591.9 | 0.01 | 0.28 |       |
| 0.28   | 6.53 | 73. | 10.0 | 280.3 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 14    | -19.9 | 0.452 | -9.000 | -9.000 | -999. | 729.  | 426.1  | 0.07 | 0.28 |       |
| 0.41   | 5.60 | 59. | 10.0 | 278.8 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 15    | -33.5 | 0.324 | -9.000 | -9.000 | -999. | 454.  | 115.3  | 0.01 | 0.28 |       |
| 1.00   | 5.62 | 72. | 10.0 | 278.1 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 16    | -32.9 | 0.317 | -9.000 | -9.000 | -999. | 429.  | 110.7  | 0.01 | 0.28 |       |
| 1.00   | 5.51 | 71. | 10.0 | 277.5 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 17    | -25.5 | 0.246 | -9.000 | -9.000 | -999. | 295.  | 66.7   | 0.01 | 0.28 |       |
| 1.00   | 4.32 | 62. | 10.0 | 277.0 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 18    | -30.6 | 0.295 | -9.000 | -9.000 | -999. | 385.  | 95.7   | 0.01 | 0.28 |       |
| 1.00   | 5.14 | 62. | 10.0 | 277.5 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 19    | -35.3 | 0.340 | -9.000 | -9.000 | -999. | 476.  | 127.2  | 0.01 | 0.28 |       |
| 1.00   | 5.89 | 66. | 10.0 | 276.4 | 2.0   |       |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1    | 20    | -39.1 | 0.376 | -9.000 | -9.000 | -999. | 552.  | 155.2  | 0.01 | 0.28 |       |



```

1.00    6.48   67.   10.0  276.4    2.0
  18 01 01   1 21  -31.0  0.298 -9.000 -9.000 -999.  394.      97.7  0.01   0.28
1.00    5.19   65.   10.0  276.4    2.0
  18 01 01   1 22  -29.6  0.285 -9.000 -9.000 -999.  365.      89.2  0.01   0.28
1.00    4.97   62.   10.0  276.4    2.0
  18 01 01   1 23  -31.5  0.303 -9.000 -9.000 -999.  400.     100.8  0.01   0.28
1.00    5.27   61.   10.0  276.4    2.0
  18 01 01   1 24  -31.5  0.304 -9.000 -9.000 -999.  402.     101.6  0.01   0.28
1.00    5.29   63.   10.0  277.0    2.0

```

First hour of profile data

```

YR MO DY HR HEIGHT F  WDIR    WSPD AMB_TMP sigmaA  sigmaW  sigmaV
18 01 01 01   10.0 1   67.    5.51  276.0   99.0  -99.00 -99.00

```

F indicates top of profile (=1) or below (=0)

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/12/23

```

*** AERMET - VERSION  22112 ***   ***
***                               ***
                               17:53:29

```

PAGE 4

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM ANNUAL RESULTS

AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID      |                      | NETWORK | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV,     |
|---------------|----------------------|---------|--------------|------------------------------|
| ZHILL, ZFLAG) | OF TYPE              | GRID-ID |              |                              |
| EG            | 1ST HIGHEST VALUE IS |         | 0.00363 AT ( | 430188.78, 5202928.50, 4.81, |
| 5.40,         | 0.00) DC             |         |              |                              |
|               | 2ND HIGHEST VALUE IS |         | 0.00363 AT ( | 430190.34, 5202928.38, 4.63, |
| 5.40,         | 0.00) DC             |         |              |                              |
|               | 3RD HIGHEST VALUE IS |         | 0.00361 AT ( | 430188.78, 5202916.00, 4.78, |
| 4.78,         | 0.00) DC             |         |              |                              |
|               | 4TH HIGHEST VALUE IS |         | 0.00360 AT ( | 430190.29, 5202916.15, 4.59, |
| 5.41,         | 0.00) DC             |         |              |                              |
|               | 5TH HIGHEST VALUE IS |         | 0.00359 AT ( | 430176.34, 5202916.00, 5.53, |
| 5.53,         | 0.00) DC             |         |              |                              |
|               | 6TH HIGHEST VALUE IS |         | 0.00358 AT ( | 430190.40, 5202940.60, 4.77, |

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| 5.44,  | 0.00) DC              | 0.00358 AT ( | 430188.78, | 5202941.00, | 4.95, |
| 4.95,  | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.00358 AT ( | 430176.34, | 5202928.50, | 5.54, |
| 5.54,  | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.00354 AT ( | 430176.34, | 5202903.50, | 5.56, |
| 5.56,  | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 0.00353 AT ( | 430188.78, | 5202903.50, | 4.79, |
| 4.79,  | 0.00) DC              |              |            |             |       |
| EP01   | 1ST HIGHEST VALUE IS  | 0.21642 AT ( | 430151.50, | 5203065.00, | 4.78, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 0.21586 AT ( | 430176.34, | 5203065.00, | 5.11, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.21558 AT ( | 430139.06, | 5203065.00, | 4.66, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.21535 AT ( | 430126.63, | 5203065.00, | 4.72, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 0.21491 AT ( | 430139.06, | 5203053.00, | 4.68, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.21488 AT ( | 430151.50, | 5203053.00, | 4.76, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.21487 AT ( | 430126.63, | 5203053.00, | 4.71, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.21424 AT ( | 430114.19, | 5203053.00, | 4.77, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.21417 AT ( | 430163.91, | 5203065.00, | 4.66, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 0.21400 AT ( | 430114.19, | 5203065.00, | 4.73, |
| 92.43, | 0.00) DC              |              |            |             |       |
| EP02   | 1ST HIGHEST VALUE IS  | 0.10180 AT ( | 430188.78, | 5203028.00, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 0.10158 AT ( | 430188.78, | 5203015.50, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.10135 AT ( | 430191.48, | 5203021.69, | 4.36, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.10107 AT ( | 430192.23, | 5203029.44, | 4.28, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 0.10098 AT ( | 430190.73, | 5203013.94, | 4.44, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.10067 AT ( | 430176.34, | 5203015.50, | 5.23, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.10057 AT ( | 430176.34, | 5203028.00, | 5.19, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.09974 AT ( | 430188.78, | 5203040.50, | 4.68, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.09968 AT ( | 430188.78, | 5203003.00, | 4.68, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 0.09936 AT ( | 430176.34, | 5203003.00, | 5.28, |

92.43, 0.00) DC

EP03 1ST HIGHEST VALUE IS 0.10258 AT ( 430188.78, 5203028.00, 4.70,  
92.43, 0.00) DC  
2ND HIGHEST VALUE IS 0.10252 AT ( 430188.78, 5203015.50, 4.70,  
92.43, 0.00) DC  
3RD HIGHEST VALUE IS 0.10233 AT ( 430191.48, 5203021.69, 4.36,  
92.43, 0.00) DC  
4TH HIGHEST VALUE IS 0.10203 AT ( 430190.73, 5203013.94, 4.44,  
92.43, 0.00) DC  
5TH HIGHEST VALUE IS 0.10199 AT ( 430192.23, 5203029.44, 4.28,  
92.43, 0.00) DC  
6TH HIGHEST VALUE IS 0.10122 AT ( 430176.34, 5203015.50, 5.23,  
92.43, 0.00) DC  
7TH HIGHEST VALUE IS 0.10099 AT ( 430176.34, 5203028.00, 5.19,  
92.43, 0.00) DC  
8TH HIGHEST VALUE IS 0.10081 AT ( 430188.78, 5203003.00, 4.68,  
92.43, 0.00) DC  
9TH HIGHEST VALUE IS 0.10041 AT ( 430188.78, 5203040.50, 4.68,  
92.43, 0.00) DC  
10TH HIGHEST VALUE IS 0.10009 AT ( 430190.67, 5203001.72, 4.41,  
92.43, 0.00) DC

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/12/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*  
\*\*\* 17:53:29

PAGE 5

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM ANNUAL RESULTS

AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID              | NETWORK   | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |
|-----------------------|-----------|--------------|--------------------------|
| ZHILL, ZFLAG) OF TYPE | GRID-ID   |              |                          |
| - - - - -             | - - - - - | - - - - -    | - - - - -                |
| - - - - -             | - - - - - | - - - - -    | - - - - -                |

EP04 1ST HIGHEST VALUE IS 0.42774 AT ( 430797.97, 5203015.50, 6.01,  
6.01, 0.00) DC  
2ND HIGHEST VALUE IS 0.42577 AT ( 430847.69, 5203003.00, 5.45,  
5.45, 0.00) DC  
3RD HIGHEST VALUE IS 0.42577 AT ( 430822.84, 5203040.50, 5.93,

|        |                      |              |            |             |       |
|--------|----------------------|--------------|------------|-------------|-------|
| 7.90,  | 0.00) DC             | 0.42557 AT ( | 430835.28, | 5202990.50, | 5.59, |
| 6.29,  | 0.00) DC             | 0.42503 AT ( | 430810.41, | 5203040.50, | 6.01, |
| 7.15,  | 0.00) DC             | 0.42501 AT ( | 430835.28, | 5203003.00, | 5.28, |
| 6.29,  | 0.00) DC             | 0.42433 AT ( | 430810.41, | 5203028.00, | 5.56, |
| 5.56,  | 0.00) DC             | 0.42420 AT ( | 430822.84, | 5203003.00, | 5.23, |
| 5.23,  | 0.00) DC             | 0.42401 AT ( | 430847.69, | 5202990.50, | 5.48, |
| 5.48,  | 0.00) DC             | 0.42274 AT ( | 430835.28, | 5203015.50, | 4.98, |
| 4.98,  | 0.00) DC             |              |            |             |       |
| EP05   | 1ST HIGHEST VALUE IS | 0.03179 AT ( | 430190.45, | 5202952.82, | 5.21, |
| 92.43, | 0.00) DC             | 0.03177 AT ( | 430190.51, | 5202965.05, | 4.56, |
| 92.43, | 0.00) DC             | 0.03172 AT ( | 430188.78, | 5202965.50, | 4.77, |
| 92.43, | 0.00) DC             | 0.03166 AT ( | 430188.78, | 5202953.50, | 5.22, |
| 92.43, | 0.00) DC             | 0.03116 AT ( | 430190.56, | 5202977.27, | 4.52, |
| 92.43, | 0.00) DC             | 0.03107 AT ( | 430188.78, | 5202978.00, | 4.73, |
| 92.43, | 0.00) DC             | 0.03045 AT ( | 430190.62, | 5202989.49, | 4.43, |
| 92.43, | 0.00) DC             | 0.03045 AT ( | 430744.02, | 5203016.94, | 5.14, |
| 92.43, | 0.00) DC             | 0.03040 AT ( | 430188.78, | 5202990.50, | 4.68, |
| 92.43, | 0.00) DC             | 0.03029 AT ( | 430176.34, | 5202965.50, | 5.47, |
| 92.43, | 0.00) DC             |              |            |             |       |
| EP06   | 1ST HIGHEST VALUE IS | 0.03175 AT ( | 430744.02, | 5203016.94, | 5.14, |
| 92.43, | 0.00) DC             | 0.03151 AT ( | 430190.45, | 5202952.82, | 5.21, |
| 92.43, | 0.00) DC             | 0.03149 AT ( | 430190.51, | 5202965.05, | 4.56, |
| 92.43, | 0.00) DC             | 0.03145 AT ( | 430738.77, | 5203027.94, | 5.10, |
| 92.43, | 0.00) DC             | 0.03142 AT ( | 430188.78, | 5202965.50, | 4.77, |
| 92.43, | 0.00) DC             | 0.03139 AT ( | 430188.78, | 5202953.50, | 5.22, |
| 92.43, | 0.00) DC             | 0.03089 AT ( | 430190.56, | 5202977.27, | 4.52, |
|        | 7TH HIGHEST VALUE IS |              |            |             |       |

|        |                       |    |         |      |            |             |
|--------|-----------------------|----|---------|------|------------|-------------|
| 92.43, | 0.00)                 | DC |         |      |            |             |
|        | 8TH HIGHEST VALUE IS  |    | 0.03077 | AT ( | 430188.78, | 5202978.00, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.73,       |
|        | 9TH HIGHEST VALUE IS  |    | 0.03067 | AT ( | 430731.77, | 5203037.94, |
| 92.43, | 0.00)                 | DC |         |      |            | 5.11,       |
|        | 10TH HIGHEST VALUE IS |    | 0.03064 | AT ( | 430748.25, | 5203015.50, |
| 92.43, | 0.00)                 | DC |         |      |            | 5.09,       |
| EP08   | 1ST HIGHEST VALUE IS  |    | 0.36335 | AT ( | 430192.23, | 5203029.44, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.28,       |
|        | 2ND HIGHEST VALUE IS  |    | 0.36265 | AT ( | 430191.48, | 5203021.69, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.36,       |
|        | 3RD HIGHEST VALUE IS  |    | 0.36102 | AT ( | 430190.73, | 5203013.94, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.44,       |
|        | 4TH HIGHEST VALUE IS  |    | 0.36005 | AT ( | 430188.78, | 5203028.00, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.70,       |
|        | 5TH HIGHEST VALUE IS  |    | 0.35982 | AT ( | 430188.78, | 5203015.50, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.70,       |
|        | 6TH HIGHEST VALUE IS  |    | 0.35935 | AT ( | 430192.87, | 5203041.83, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.23,       |
|        | 7TH HIGHEST VALUE IS  |    | 0.35894 | AT ( | 430188.78, | 5203040.50, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.68,       |
|        | 8TH HIGHEST VALUE IS  |    | 0.35539 | AT ( | 430193.52, | 5203054.23, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.25,       |
|        | 9TH HIGHEST VALUE IS  |    | 0.35520 | AT ( | 430188.78, | 5203003.00, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.68,       |
|        | 10TH HIGHEST VALUE IS |    | 0.35509 | AT ( | 430190.67, | 5203001.72, |
| 92.43, | 0.00)                 | DC |         |      |            | 4.41,       |

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*

07/12/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*

\*\*\*

17:53:29

PAGE 6

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM ANNUAL RESULTS

AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID      |         | NETWORK | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |
|---------------|---------|---------|--------------|--------------------------|
| ZHILL, ZFLAG) | OF TYPE | GRID-ID |              |                          |
| -----         |         |         |              |                          |
| -----         |         |         |              |                          |

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| EP09   | 1ST HIGHEST VALUE IS  | 0.08146 AT ( | 430738.77, | 5203027.94, | 5.10, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 0.08014 AT ( | 430744.02, | 5203016.94, | 5.14, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.07781 AT ( | 430717.77, | 5203057.94, | 5.11, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.07719 AT ( | 430724.77, | 5203047.94, | 5.10, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 0.07687 AT ( | 430731.77, | 5203037.94, | 5.11, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.07653 AT ( | 430748.25, | 5203015.50, | 5.09, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.07423 AT ( | 430723.38, | 5203053.00, | 5.09, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.07328 AT ( | 430748.25, | 5203028.00, | 5.07, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.07323 AT ( | 430749.27, | 5203005.94, | 5.13, |
| 5.13,  | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 0.07036 AT ( | 430715.77, | 5203067.94, | 5.15, |
| 92.43, | 0.00) DC              |              |            |             |       |
| EP10   | 1ST HIGHEST VALUE IS  | 0.54223 AT ( | 430713.80, | 5203090.14, | 5.09, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 0.53957 AT ( | 430713.77, | 5203077.94, | 5.23, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.52506 AT ( | 430713.84, | 5203102.34, | 5.03, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.51808 AT ( | 430715.77, | 5203067.94, | 5.15, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 0.49273 AT ( | 430723.38, | 5203090.00, | 5.16, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.48830 AT ( | 430713.87, | 5203114.54, | 4.99, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.48392 AT ( | 430723.38, | 5203102.50, | 5.18, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.47910 AT ( | 430723.38, | 5203077.50, | 5.13, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.44749 AT ( | 430717.77, | 5203057.94, | 5.11, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 0.43743 AT ( | 430723.38, | 5203115.00, | 5.09, |
| 92.43, | 0.00) DC              |              |            |             |       |
| EP11   | 1ST HIGHEST VALUE IS  | 0.50769 AT ( | 430713.80, | 5203090.14, | 5.09, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 0.49401 AT ( | 430713.77, | 5203077.94, | 5.23, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.49028 AT ( | 430713.84, | 5203102.34, | 5.03, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.47019 AT ( | 430715.77, | 5203067.94, | 5.15, |

|        |                       |         |                 |             |
|--------|-----------------------|---------|-----------------|-------------|
| 92.43, | 0.00) DC              |         |                 |             |
|        | 5TH HIGHEST VALUE IS  | 0.46451 | AT ( 430723.38, | 5203102.50, |
| 92.43, | 0.00) DC              |         |                 | 5.18,       |
|        | 6TH HIGHEST VALUE IS  | 0.46400 | AT ( 430723.38, | 5203090.00, |
| 92.43, | 0.00) DC              |         |                 | 5.16,       |
|        | 7TH HIGHEST VALUE IS  | 0.46154 | AT ( 430713.87, | 5203114.54, |
| 92.43, | 0.00) DC              |         |                 | 4.99,       |
|        | 8TH HIGHEST VALUE IS  | 0.45195 | AT ( 430723.38, | 5203077.50, |
| 92.43, | 0.00) DC              |         |                 | 5.13,       |
|        | 9TH HIGHEST VALUE IS  | 0.42104 | AT ( 430723.38, | 5203115.00, |
| 92.43, | 0.00) DC              |         |                 | 5.09,       |
|        | 10TH HIGHEST VALUE IS | 0.40409 | AT ( 430717.77, | 5203057.94, |
| 92.43, | 0.00) DC              |         |                 | 5.11,       |
| EP12   | 1ST HIGHEST VALUE IS  | 0.18203 | AT ( 430713.77, | 5203077.94, |
| 92.43, | 0.00) DC              |         |                 | 5.23,       |
|        | 2ND HIGHEST VALUE IS  | 0.18060 | AT ( 430715.77, | 5203067.94, |
| 92.43, | 0.00) DC              |         |                 | 5.15,       |
|        | 3RD HIGHEST VALUE IS  | 0.18006 | AT ( 430713.80, | 5203090.14, |
| 92.43, | 0.00) DC              |         |                 | 5.09,       |
|        | 4TH HIGHEST VALUE IS  | 0.17437 | AT ( 430723.38, | 5203077.50, |
| 92.43, | 0.00) DC              |         |                 | 5.13,       |
|        | 5TH HIGHEST VALUE IS  | 0.17122 | AT ( 430723.38, | 5203090.00, |
| 92.43, | 0.00) DC              |         |                 | 5.16,       |
|        | 6TH HIGHEST VALUE IS  | 0.16673 | AT ( 430713.84, | 5203102.34, |
| 92.43, | 0.00) DC              |         |                 | 5.03,       |
|        | 7TH HIGHEST VALUE IS  | 0.16607 | AT ( 430717.77, | 5203057.94, |
| 92.43, | 0.00) DC              |         |                 | 5.11,       |
|        | 8TH HIGHEST VALUE IS  | 0.16435 | AT ( 430723.38, | 5203065.00, |
| 92.43, | 0.00) DC              |         |                 | 5.01,       |
|        | 9TH HIGHEST VALUE IS  | 0.16369 | AT ( 430723.38, | 5203102.50, |
| 92.43, | 0.00) DC              |         |                 | 5.18,       |
|        | 10TH HIGHEST VALUE IS | 0.15135 | AT ( 430723.38, | 5203053.00, |
| 92.43, | 0.00) DC              |         |                 | 5.09,       |

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*

07/12/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*

\*\*\*

17:53:29

PAGE 7

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM ANNUAL RESULTS

AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID              | NETWORK               | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV,     |
|-----------------------|-----------------------|--------------|------------------------------|
| ZHILL, ZFLAG) OF TYPE | GRID-ID               |              |                              |
| -----                 |                       |              |                              |
| -----                 |                       |              |                              |
| EP13                  | 1ST HIGHEST VALUE IS  | 0.56661 AT ( | 430713.80, 5203090.14, 5.09, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 2ND HIGHEST VALUE IS  | 0.55695 AT ( | 430713.77, 5203077.94, 5.23, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 3RD HIGHEST VALUE IS  | 0.55256 AT ( | 430713.84, 5203102.34, 5.03, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 4TH HIGHEST VALUE IS  | 0.52981 AT ( | 430715.77, 5203067.94, 5.15, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 5TH HIGHEST VALUE IS  | 0.50964 AT ( | 430713.87, 5203114.54, 4.99, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 6TH HIGHEST VALUE IS  | 0.50799 AT ( | 430723.38, 5203090.00, 5.16, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 7TH HIGHEST VALUE IS  | 0.50359 AT ( | 430723.38, 5203102.50, 5.18, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 8TH HIGHEST VALUE IS  | 0.49669 AT ( | 430723.38, 5203077.50, 5.13, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 9TH HIGHEST VALUE IS  | 0.46110 AT ( | 430717.77, 5203057.94, 5.11, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 10TH HIGHEST VALUE IS | 0.45635 AT ( | 430723.38, 5203115.00, 5.09, |
| 92.43,                | 0.00) DC              |              |                              |
| EP14                  | 1ST HIGHEST VALUE IS  | 0.49076 AT ( | 430713.80, 5203090.14, 5.09, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 2ND HIGHEST VALUE IS  | 0.48878 AT ( | 430713.84, 5203102.34, 5.03, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 3RD HIGHEST VALUE IS  | 0.46626 AT ( | 430713.77, 5203077.94, 5.23, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 4TH HIGHEST VALUE IS  | 0.46235 AT ( | 430713.87, 5203114.54, 4.99, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 5TH HIGHEST VALUE IS  | 0.45208 AT ( | 430723.38, 5203102.50, 5.18, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 6TH HIGHEST VALUE IS  | 0.44579 AT ( | 430723.38, 5203090.00, 5.16, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 7TH HIGHEST VALUE IS  | 0.43549 AT ( | 430715.77, 5203067.94, 5.15, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 8TH HIGHEST VALUE IS  | 0.42627 AT ( | 430723.38, 5203077.50, 5.13, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 9TH HIGHEST VALUE IS  | 0.42072 AT ( | 430723.38, 5203115.00, 5.09, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 10TH HIGHEST VALUE IS | 0.41284 AT ( | 430713.90, 5203126.74, 4.97, |
| 92.43,                | 0.00) DC              |              |                              |
| FEL_P1                | 1ST HIGHEST VALUE IS  | 0.66441 AT ( | 430196.73, 5203116.20, 4.25, |



|        |       |                       |         |      |            |             |       |
|--------|-------|-----------------------|---------|------|------------|-------------|-------|
| 92.43, | 0.00) | DC                    | 0.65364 | AT ( | 430197.37, | 5203128.59, | 4.30, |
| 92.43, | 0.00) | DC                    |         |      |            |             |       |
|        |       | 2ND HIGHEST VALUE IS  | 0.64480 | AT ( | 430196.09, | 5203103.80, | 4.32, |
| 92.43, | 0.00) | DC                    |         |      |            |             |       |
|        |       | 3RD HIGHEST VALUE IS  | 0.63595 | AT ( | 430188.78, | 5203115.00, | 4.70, |
| 92.43, | 0.00) | DC                    |         |      |            |             |       |
|        |       | 4TH HIGHEST VALUE IS  | 0.62202 | AT ( | 430188.78, | 5203127.50, | 4.71, |
| 92.43, | 0.00) | DC                    |         |      |            |             |       |
|        |       | 5TH HIGHEST VALUE IS  | 0.62043 | AT ( | 430188.78, | 5203102.50, | 4.73, |
| 92.43, | 0.00) | DC                    |         |      |            |             |       |
|        |       | 6TH HIGHEST VALUE IS  | 0.60304 | AT ( | 430195.44, | 5203091.41, | 4.39, |
| 92.43, | 0.00) | DC                    |         |      |            |             |       |
|        |       | 7TH HIGHEST VALUE IS  | 0.60038 | AT ( | 430198.02, | 5203140.98, | 4.33, |
| 92.43, | 0.00) | DC                    |         |      |            |             |       |
|        |       | 8TH HIGHEST VALUE IS  | 0.58306 | AT ( | 430176.34, | 5203115.00, | 4.96, |
| 92.43, | 0.00) | DC                    |         |      |            |             |       |
|        |       | 9TH HIGHEST VALUE IS  | 0.58266 | AT ( | 430188.78, | 5203090.00, | 4.72, |
| 92.43, | 0.00) | DC                    |         |      |            |             |       |
|        |       | 10TH HIGHEST VALUE IS |         |      |            |             |       |
| 92.43, | 0.00) | DC                    |         |      |            |             |       |
| FEL_P2 |       | 1ST HIGHEST VALUE IS  | 0.33244 | AT ( | 430192.87, | 5203041.83, | 4.23, |
| 92.43, | 0.00) | DC                    |         |      |            |             |       |
|        |       | 2ND HIGHEST VALUE IS  | 0.32808 | AT ( | 430188.78, | 5203040.50, | 4.68, |
| 92.43, | 0.00) | DC                    |         |      |            |             |       |
|        |       | 3RD HIGHEST VALUE IS  | 0.32712 | AT ( | 430192.23, | 5203029.44, | 4.28, |
| 92.43, | 0.00) | DC                    |         |      |            |             |       |
|        |       | 4TH HIGHEST VALUE IS  | 0.32334 | AT ( | 430188.78, | 5203028.00, | 4.70, |
| 92.43, | 0.00) | DC                    |         |      |            |             |       |
|        |       | 5TH HIGHEST VALUE IS  | 0.32038 | AT ( | 430193.52, | 5203054.23, | 4.25, |
| 92.43, | 0.00) | DC                    |         |      |            |             |       |
|        |       | 6TH HIGHEST VALUE IS  | 0.31647 | AT ( | 430191.48, | 5203021.69, | 4.36, |
| 92.43, | 0.00) | DC                    |         |      |            |             |       |
|        |       | 7TH HIGHEST VALUE IS  | 0.31597 | AT ( | 430188.78, | 5203053.00, | 4.70, |
| 92.43, | 0.00) | DC                    |         |      |            |             |       |
|        |       | 8TH HIGHEST VALUE IS  | 0.30454 | AT ( | 430188.78, | 5203015.50, | 4.70, |
| 92.43, | 0.00) | DC                    |         |      |            |             |       |
|        |       | 9TH HIGHEST VALUE IS  | 0.30163 | AT ( | 430176.34, | 5203040.50, | 5.19, |
| 92.43, | 0.00) | DC                    |         |      |            |             |       |
|        |       | 10TH HIGHEST VALUE IS | 0.30146 | AT ( | 430190.73, | 5203013.94, | 4.44, |
| 92.43, | 0.00) | DC                    |         |      |            |             |       |

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/12/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*

\*\*\* 17:53:29

PAGE 8

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM ANNUAL RESULTS

AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID      | NETWORK               | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV,     |
|---------------|-----------------------|--------------|------------------------------|
| ZHILL, ZFLAG) | OF TYPE GRID-ID       |              |                              |
| - - - - -     | - - - - -             | - - - - -    | - - - - -                    |
| - - - - -     | - - - - -             | - - - - -    | - - - - -                    |
| FEL_P3        | 1ST HIGHEST VALUE IS  | 0.25962 AT ( | 430190.45, 5202952.82, 5.21, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 2ND HIGHEST VALUE IS  | 0.25651 AT ( | 430188.78, 5202953.50, 5.22, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 3RD HIGHEST VALUE IS  | 0.25464 AT ( | 430190.51, 5202965.05, 4.56, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 4TH HIGHEST VALUE IS  | 0.25295 AT ( | 430188.78, 5202965.50, 4.77, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 5TH HIGHEST VALUE IS  | 0.24315 AT ( | 430190.56, 5202977.27, 4.52, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 6TH HIGHEST VALUE IS  | 0.24036 AT ( | 430188.78, 5202978.00, 4.73, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 7TH HIGHEST VALUE IS  | 0.23989 AT ( | 430190.40, 5202940.60, 4.77, |
| 5.44,         | 0.00) DC              |              |                              |
|               | 8TH HIGHEST VALUE IS  | 0.23976 AT ( | 430188.78, 5202941.00, 4.95, |
| 4.95,         | 0.00) DC              |              |                              |
|               | 9TH HIGHEST VALUE IS  | 0.23357 AT ( | 430176.34, 5202953.50, 5.50, |
| 5.50,         | 0.00) DC              |              |                              |
|               | 10TH HIGHEST VALUE IS | 0.23272 AT ( | 430176.34, 5202965.50, 5.47, |
| 92.43,        | 0.00) DC              |              |                              |
| LOAD_P        | 1ST HIGHEST VALUE IS  | 0.00116 AT ( | 430192.23, 5203029.44, 4.28, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 2ND HIGHEST VALUE IS  | 0.00116 AT ( | 430191.48, 5203021.69, 4.36, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 3RD HIGHEST VALUE IS  | 0.00115 AT ( | 430192.87, 5203041.83, 4.23, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 4TH HIGHEST VALUE IS  | 0.00115 AT ( | 430713.77, 5203077.94, 5.23, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 5TH HIGHEST VALUE IS  | 0.00115 AT ( | 430713.80, 5203090.14, 5.09, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 6TH HIGHEST VALUE IS  | 0.00115 AT ( | 430188.78, 5203028.00, 4.70, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 7TH HIGHEST VALUE IS  | 0.00114 AT ( | 430190.73, 5203013.94, 4.44, |
| 92.43,        | 0.00) DC              |              |                              |
|               | 8TH HIGHEST VALUE IS  | 0.00114 AT ( | 430188.78, 5203015.50, 4.70, |
| 92.43,        | 0.00) DC              |              |                              |

|        |                       |         |      |            |             |       |
|--------|-----------------------|---------|------|------------|-------------|-------|
| 92.43, | 9TH HIGHEST VALUE IS  | 0.00114 | AT ( | 430188.78, | 5203040.50, | 4.68, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
| 92.43, | 10TH HIGHEST VALUE IS | 0.00114 | AT ( | 430715.77, | 5203067.94, | 5.15, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
| PILE1  | 1ST HIGHEST VALUE IS  | 0.84891 | AT ( | 430198.66, | 5203153.38, | 4.42, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
| 92.43, | 2ND HIGHEST VALUE IS  | 0.81948 | AT ( | 430199.30, | 5203165.77, | 4.48, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
| 92.43, | 3RD HIGHEST VALUE IS  | 0.79204 | AT ( | 430198.02, | 5203140.98, | 4.33, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
| 92.43, | 4TH HIGHEST VALUE IS  | 0.77214 | AT ( | 430188.78, | 5203152.00, | 4.73, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
| 92.43, | 5TH HIGHEST VALUE IS  | 0.73919 | AT ( | 430188.78, | 5203164.50, | 4.71, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
| 92.43, | 6TH HIGHEST VALUE IS  | 0.73795 | AT ( | 430188.78, | 5203140.00, | 4.72, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
| 92.43, | 7TH HIGHEST VALUE IS  | 0.69273 | AT ( | 430197.37, | 5203128.59, | 4.30, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
| 92.43, | 8TH HIGHEST VALUE IS  | 0.68493 | AT ( | 430199.94, | 5203178.16, | 4.29, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
| 92.43, | 9TH HIGHEST VALUE IS  | 0.67599 | AT ( | 430176.34, | 5203152.00, | 4.84, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
| 92.43, | 10TH HIGHEST VALUE IS | 0.66073 | AT ( | 430176.34, | 5203140.00, | 4.88, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
| PILE2  | 1ST HIGHEST VALUE IS  | 1.06232 | AT ( | 430192.23, | 5203029.44, | 4.28, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
| 92.43, | 2ND HIGHEST VALUE IS  | 1.05568 | AT ( | 430188.78, | 5203028.00, | 4.70, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
| 92.43, | 3RD HIGHEST VALUE IS  | 1.04158 | AT ( | 430191.48, | 5203021.69, | 4.36, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
| 92.43, | 4TH HIGHEST VALUE IS  | 0.99158 | AT ( | 430188.78, | 5203015.50, | 4.70, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
| 92.43, | 5TH HIGHEST VALUE IS  | 0.97587 | AT ( | 430190.73, | 5203013.94, | 4.44, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
| 92.43, | 6TH HIGHEST VALUE IS  | 0.97156 | AT ( | 430188.78, | 5203040.50, | 4.68, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
| 92.43, | 7TH HIGHEST VALUE IS  | 0.96702 | AT ( | 430192.87, | 5203041.83, | 4.23, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
| 92.43, | 8TH HIGHEST VALUE IS  | 0.92732 | AT ( | 430176.34, | 5203028.00, | 5.19, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
| 92.43, | 9TH HIGHEST VALUE IS  | 0.89360 | AT ( | 430176.34, | 5203015.50, | 5.23, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
| 92.43, | 10TH HIGHEST VALUE IS | 0.85140 | AT ( | 430176.34, | 5203040.50, | 5.19, |
| 92.43, | 0.00) DC              |         |      |            |             |       |

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/12/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*

\*\*\*

17:53:29

PAGE 9

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM ANNUAL RESULTS

AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID              | NETWORK               | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV,     |
|-----------------------|-----------------------|--------------|------------------------------|
| ZHILL, ZFLAG) OF TYPE | GRID-ID               |              |                              |
| PILE3                 | 1ST HIGHEST VALUE IS  | 0.98395 AT ( | 430190.40, 5202940.60, 4.77, |
| 5.44,                 | 0.00) DC              |              |                              |
|                       | 2ND HIGHEST VALUE IS  | 0.97798 AT ( | 430188.78, 5202941.00, 4.95, |
| 4.95,                 | 0.00) DC              |              |                              |
|                       | 3RD HIGHEST VALUE IS  | 0.96165 AT ( | 430190.45, 5202952.82, 5.21, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 4TH HIGHEST VALUE IS  | 0.93397 AT ( | 430188.78, 5202953.50, 5.22, |
| 92.43,                | 0.00) DC              |              |                              |
|                       | 5TH HIGHEST VALUE IS  | 0.91223 AT ( | 430190.34, 5202928.38, 4.63, |
| 5.40,                 | 0.00) DC              |              |                              |
|                       | 6TH HIGHEST VALUE IS  | 0.91097 AT ( | 430188.78, 5202928.50, 4.81, |
| 5.40,                 | 0.00) DC              |              |                              |
|                       | 7TH HIGHEST VALUE IS  | 0.86559 AT ( | 430176.34, 5202941.00, 5.52, |
| 5.52,                 | 0.00) DC              |              |                              |
|                       | 8TH HIGHEST VALUE IS  | 0.83492 AT ( | 430176.34, 5202928.50, 5.54, |
| 5.54,                 | 0.00) DC              |              |                              |
|                       | 9TH HIGHEST VALUE IS  | 0.80609 AT ( | 430176.34, 5202953.50, 5.50, |
| 5.50,                 | 0.00) DC              |              |                              |
|                       | 10TH HIGHEST VALUE IS | 0.78306 AT ( | 430190.29, 5202916.15, 4.59, |
| 5.41,                 | 0.00) DC              |              |                              |
| T_P                   | 1ST HIGHEST VALUE IS  | 0.01297 AT ( | 430401.24, 5202869.68, 5.67, |
| 5.67,                 | 0.00) DC              |              |                              |
|                       | 2ND HIGHEST VALUE IS  | 0.01179 AT ( | 430400.13, 5202866.50, 5.93, |
| 5.93,                 | 0.00) DC              |              |                              |
|                       | 3RD HIGHEST VALUE IS  | 0.01135 AT ( | 430389.49, 5202871.55, 5.49, |
| 5.49,                 | 0.00) DC              |              |                              |
|                       | 4TH HIGHEST VALUE IS  | 0.01032 AT ( | 430424.74, 5202865.93, 6.02, |
| 6.02,                 | 0.00) DC              |              |                              |
|                       | 5TH HIGHEST VALUE IS  | 0.01025 AT ( | 430387.69, 5202866.50, 5.92, |
| 5.92,                 | 0.00) DC              |              |                              |

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
|        | 6TH HIGHEST VALUE IS  | 0.01016 AT ( | 430377.74, | 5202873.43, | 5.40, |
| 5.40,  | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.00974 AT ( | 430371.74, | 5202875.68, | 5.23, |
| 5.23,  | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.00946 AT ( | 430365.74, | 5202877.93, | 5.16, |
| 5.16,  | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.00899 AT ( | 430375.28, | 5202866.50, | 5.91, |
| 5.91,  | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 0.00858 AT ( | 430355.41, | 5202877.60, | 5.06, |
| 5.06,  | 0.00) DC              |              |            |             |       |
| T_P1   | 1ST HIGHEST VALUE IS  | 0.33309 AT ( | 430196.73, | 5203116.20, | 4.25, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 0.31044 AT ( | 430196.09, | 5203103.80, | 4.32, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.29440 AT ( | 430188.78, | 5203115.00, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.28954 AT ( | 430188.78, | 5203102.50, | 4.73, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 0.27250 AT ( | 430195.44, | 5203091.41, | 4.39, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.27133 AT ( | 430401.24, | 5202869.68, | 5.67, |
| 5.67,  | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.25888 AT ( | 430188.78, | 5203090.00, | 4.72, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.25269 AT ( | 430389.49, | 5202871.55, | 5.49, |
| 5.49,  | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.24958 AT ( | 430400.13, | 5202866.50, | 5.93, |
| 5.93,  | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 0.24706 AT ( | 430194.80, | 5203079.01, | 4.42, |
| 92.43, | 0.00) DC              |              |            |             |       |
| T_P1EX | 1ST HIGHEST VALUE IS  | 0.21663 AT ( | 430210.43, | 5203290.86, | 4.37, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 0.20893 AT ( | 430204.93, | 5203229.55, | 4.37, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.20821 AT ( | 430201.22, | 5203289.00, | 3.87, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.20508 AT ( | 430210.73, | 5203279.46, | 4.32, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 0.20502 AT ( | 430204.83, | 5203219.25, | 4.33, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.19741 AT ( | 430205.03, | 5203239.85, | 4.31, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.19717 AT ( | 430201.22, | 5203227.00, | 4.18, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.19459 AT ( | 430204.73, | 5203208.95, | 4.43, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.18958 AT ( | 430201.22, | 5203214.50, | 4.09, |
| 92.43, | 0.00) DC              |              |            |             |       |

10TH HIGHEST VALUE IS 0.18591 AT ( 430201.22, 5203239.50, 4.05,  
92.43, 0.00) DC

\*\*\* AERMOD - VERSION 22112 \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*

07/12/23

\*\*\* AERMET - VERSION 22112 \*\*\*

\*\*\*

17:53:29

PAGE 10

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM ANNUAL RESULTS

AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID      | NETWORK         | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |
|---------------|-----------------|--------------|--------------------------|
| ZHILL, ZFLAG) | OF TYPE GRID-ID |              |                          |
| - - - - -     | - - - - -       | - - - - -    | - - - - -                |
| - - - - -     | - - - - -       | - - - - -    | - - - - -                |

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| T_P2   | 1ST HIGHEST VALUE IS  | 0.18163 AT ( | 430194.80, | 5203079.01, | 4.42, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 0.16737 AT ( | 430194.16, | 5203066.62, | 4.29, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 0.16572 AT ( | 430188.78, | 5203077.50, | 4.73, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 0.15939 AT ( | 430188.78, | 5203065.00, | 4.67, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 0.14957 AT ( | 430401.24, | 5202869.68, | 5.67, |
| 5.67,  | 0.00) DC              |              |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 0.14701 AT ( | 430193.52, | 5203054.23, | 4.25, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 0.14441 AT ( | 430188.78, | 5203053.00, | 4.70, |
| 92.43, | 0.00) DC              |              |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 0.13929 AT ( | 430389.49, | 5202871.55, | 5.49, |
| 5.49,  | 0.00) DC              |              |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 0.13757 AT ( | 430400.13, | 5202866.50, | 5.93, |
| 5.93,  | 0.00) DC              |              |            |             |       |
|        | 10TH HIGHEST VALUE IS | 0.13704 AT ( | 430176.34, | 5203065.00, | 5.11, |
| 92.43, | 0.00) DC              |              |            |             |       |

|        |                      |              |            |             |       |
|--------|----------------------|--------------|------------|-------------|-------|
| T_P2EX | 1ST HIGHEST VALUE IS | 0.12391 AT ( | 430201.22, | 5203289.00, | 3.87, |
| 92.43, | 0.00) DC             |              |            |             |       |
|        | 2ND HIGHEST VALUE IS | 0.11608 AT ( | 430210.73, | 5203279.46, | 4.32, |
| 92.43, | 0.00) DC             |              |            |             |       |

|        |                       |              |            |             |       |
|--------|-----------------------|--------------|------------|-------------|-------|
| 92.43, | 3RD HIGHEST VALUE IS  | 0.11600 AT ( | 430204.93, | 5203229.55, | 4.37, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 4TH HIGHEST VALUE IS  | 0.11382 AT ( | 430204.83, | 5203219.25, | 4.33, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 5TH HIGHEST VALUE IS  | 0.11097 AT ( | 430210.43, | 5203290.86, | 4.37, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 6TH HIGHEST VALUE IS  | 0.10995 AT ( | 430205.03, | 5203239.85, | 4.31, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 7TH HIGHEST VALUE IS  | 0.10953 AT ( | 430201.22, | 5203227.00, | 4.18, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 8TH HIGHEST VALUE IS  | 0.10821 AT ( | 430204.73, | 5203208.95, | 4.43, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 9TH HIGHEST VALUE IS  | 0.10538 AT ( | 430201.22, | 5203214.50, | 4.09, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 10TH HIGHEST VALUE IS | 0.10359 AT ( | 430201.22, | 5203239.50, | 4.05, |
|        | 0.00) DC              |              |            |             |       |
| T_P3   | 1ST HIGHEST VALUE IS  | 0.15608 AT ( | 430188.78, | 5202990.50, | 4.68, |
| 92.43, | 0.00) DC              |              |            |             |       |
| 92.43, | 2ND HIGHEST VALUE IS  | 0.15571 AT ( | 430190.62, | 5202989.49, | 4.43, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 3RD HIGHEST VALUE IS  | 0.13624 AT ( | 430188.78, | 5202978.00, | 4.73, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 4TH HIGHEST VALUE IS  | 0.13466 AT ( | 430190.56, | 5202977.27, | 4.52, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 5TH HIGHEST VALUE IS  | 0.13247 AT ( | 430190.67, | 5203001.72, | 4.41, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 6TH HIGHEST VALUE IS  | 0.12967 AT ( | 430176.34, | 5202990.50, | 5.33, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 7TH HIGHEST VALUE IS  | 0.12436 AT ( | 430176.34, | 5202978.00, | 5.39, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 8TH HIGHEST VALUE IS  | 0.12295 AT ( | 430188.78, | 5203003.00, | 4.68, |
|        | 0.00) DC              |              |            |             |       |
| 5.67,  | 9TH HIGHEST VALUE IS  | 0.11972 AT ( | 430401.24, | 5202869.68, | 5.67, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 10TH HIGHEST VALUE IS | 0.11962 AT ( | 430188.78, | 5202965.50, | 4.77, |
|        | 0.00) DC              |              |            |             |       |
| T_P3EX | 1ST HIGHEST VALUE IS  | 0.09302 AT ( | 430204.93, | 5203229.55, | 4.37, |
| 92.43, | 0.00) DC              |              |            |             |       |
| 92.43, | 2ND HIGHEST VALUE IS  | 0.09142 AT ( | 430204.83, | 5203219.25, | 4.33, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 3RD HIGHEST VALUE IS  | 0.08937 AT ( | 430210.73, | 5203279.46, | 4.32, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 4TH HIGHEST VALUE IS  | 0.08798 AT ( | 430205.03, | 5203239.85, | 4.31, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 5TH HIGHEST VALUE IS  | 0.08788 AT ( | 430201.22, | 5203227.00, | 4.18, |
|        | 0.00) DC              |              |            |             |       |
| 92.43, | 6TH HIGHEST VALUE IS  | 0.08774 AT ( | 430210.43, | 5203290.86, | 4.37, |
|        | 0.00) DC              |              |            |             |       |

7TH HIGHEST VALUE IS 0.08710 AT ( 430204.73, 5203208.95, 4.43,  
 92.43, 0.00) DC  
 8TH HIGHEST VALUE IS 0.08558 AT ( 430201.22, 5203289.00, 3.87,  
 92.43, 0.00) DC  
 9TH HIGHEST VALUE IS 0.08474 AT ( 430201.22, 5203214.50, 4.09,  
 92.43, 0.00) DC  
 10TH HIGHEST VALUE IS 0.08288 AT ( 430201.22, 5203239.50, 4.05,  
 92.43, 0.00) DC

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
 07/12/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*  
 \*\*\* 17:53:29

PAGE 11

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM ANNUAL RESULTS

AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF PM-2.5 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID              | NETWORK   | AVERAGE CONC | RECEPTOR (XR, YR, ZELEV, |
|-----------------------|-----------|--------------|--------------------------|
| ZHILL, ZFLAG) OF TYPE | GRID-ID   |              |                          |
| - - - - -             | - - - - - | - - - - -    | - - - - -                |
| - - - - -             | - - - - - | - - - - -    | - - - - -                |

T\_PEX 1ST HIGHEST VALUE IS 0.03571 AT ( 430210.43, 5203290.86, 4.37,  
 92.43, 0.00) DC  
 2ND HIGHEST VALUE IS 0.03483 AT ( 430201.22, 5203289.00, 3.87,  
 92.43, 0.00) DC  
 3RD HIGHEST VALUE IS 0.03282 AT ( 430210.73, 5203279.46, 4.32,  
 92.43, 0.00) DC  
 4TH HIGHEST VALUE IS 0.02745 AT ( 430201.22, 5203276.50, 3.94,  
 92.43, 0.00) DC  
 5TH HIGHEST VALUE IS 0.02665 AT ( 430188.78, 5203289.00, 5.02,  
 92.43, 0.00) DC  
 6TH HIGHEST VALUE IS 0.02474 AT ( 430207.98, 5203269.96, 4.21,  
 92.43, 0.00) DC  
 7TH HIGHEST VALUE IS 0.02431 AT ( 430188.78, 5203276.50, 4.92,  
 92.43, 0.00) DC  
 8TH HIGHEST VALUE IS 0.02271 AT ( 430210.13, 5203302.26, 3.15,  
 92.43, 0.00) DC  
 9TH HIGHEST VALUE IS 0.02124 AT ( 430201.22, 5203301.50, 3.49,  
 92.43, 0.00) DC  
 10TH HIGHEST VALUE IS 0.02105 AT ( 430176.34, 5203289.00, 4.43,



92.43, 0.00) DC

|        |                       |         |      |            |             |       |
|--------|-----------------------|---------|------|------------|-------------|-------|
| ALL    | 1ST HIGHEST VALUE IS  | 3.85737 | AT ( | 430192.23, | 5203029.44, | 4.28, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
|        | 2ND HIGHEST VALUE IS  | 3.85160 | AT ( | 430188.78, | 5203028.00, | 4.70, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
|        | 3RD HIGHEST VALUE IS  | 3.82952 | AT ( | 430188.78, | 5203040.50, | 4.68, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
|        | 4TH HIGHEST VALUE IS  | 3.82263 | AT ( | 430192.87, | 5203041.83, | 4.23, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
|        | 5TH HIGHEST VALUE IS  | 3.81205 | AT ( | 430191.48, | 5203021.69, | 4.36, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
|        | 6TH HIGHEST VALUE IS  | 3.76575 | AT ( | 430188.78, | 5203015.50, | 4.70, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
|        | 7TH HIGHEST VALUE IS  | 3.74427 | AT ( | 430190.73, | 5203013.94, | 4.44, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
|        | 8TH HIGHEST VALUE IS  | 3.70218 | AT ( | 430188.78, | 5203053.00, | 4.70, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
|        | 9TH HIGHEST VALUE IS  | 3.69627 | AT ( | 430193.52, | 5203054.23, | 4.25, |
| 92.43, | 0.00) DC              |         |      |            |             |       |
|        | 10TH HIGHEST VALUE IS | 3.68520 | AT ( | 430188.78, | 5203003.00, | 4.68, |
| 92.43, | 0.00) DC              |         |      |            |             |       |

\*\*\* RECEPTOR TYPES: GC = GRIDCART  
GP = GRIDPOLR  
DC = DISCCART  
DP = DISCPOLR

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/12/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*  
\*\*\* 17:53:29

PAGE 12

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* Message Summary : AERMOD Model Execution \*\*\*

----- Summary of Total Messages -----

A Total of 0 Fatal Error Message(s)  
A Total of 2 Warning Message(s)  
A Total of 758 Informational Message(s)

A Total of 43824 Hours Were Processed

A Total of 398 Calm Hours Identified

A Total of 360 Missing Hours Identified ( 0.82 Percent)

\*\*\*\*\* FATAL ERROR MESSAGES \*\*\*\*\*  
\*\*\* NONE \*\*\*

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*  
SO W320 1503 PPARM: Input Parameter May Be Out-of-Range for Parameter  
VS  
ME W187 13687 MEOPEN: ADJ\_U\* Option for Stable Low Winds used in AERMET

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/13/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*  
\*\*\* 12:02:54

PAGE 1

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* MODEL SETUP OPTIONS SUMMARY

\*\*\*

\*\* Model Options Selected:

- \* Model Allows User-Specified Options
- \* Model Is Setup For Calculation of Average CONCentration Values.
- \* NO GAS DEPOSITION Data Provided.
- \* NO PARTICLE DEPOSITION Data Provided.
- \* Model Uses NO DRY DEPLETION. DDPLETE = F
- \* Model Uses NO WET DEPLETION. WETDPLT = F
- \* Stack-tip Downwash.
- \* Model Accounts for ELEVated Terrain Effects.
- \* Use Calms Processing Routine.
- \* Use Missing Data Processing Routine.
- \* No Exponential Decay.
- \* Model Uses RURAL Dispersion Only.
- \* Option for Capped & Horiz Stacks Selected With:
  - 0 Capped Stack(s); and 3 Horizontal Stack(s)
- \* ADJ\_U\* - Use ADJ\_U\* option for SBL in AERMET
- \* CCVR\_Sub - Meteorological data includes CCVR substitutions
- \* TEMP\_Sub - Meteorological data includes TEMP substitutions
- \* Model Assumes No FLAGPOLE Receptor Heights.
- \* The User Specified a Pollutant Type of: PM-10

\*\*Model Calculates 1 Short Term Average(s) of: 24-HR

\*\*This Run Includes: 652 Source(s); 30 Source Group(s); and 11358  
Receptor(s)

with: 14 POINT(s), including  
0 POINTCAP(s) and 3 POINTHOR(s)  
and: 635 VOLUME source(s)  
and: 3 AREA type source(s)  
and: 0 LINE source(s)  
and: 0 RLINE/RLINEXT source(s)  
and: 0 OPENPIT source(s)  
and: 0 BUOYANT LINE source(s) with a total of 0 line(s)  
and: 0 SWPOINT source(s)

[illegible]

NOTE: METEOROLOGICAL DATA ACTUALLY PROCESSED WILL ALSO DEPEND ON WHAT IS INCLUDED IN THE DATA FILE.

10.80, 1.54, 3.09, 5.14, 8.23,

\*\*\* MODELOPTS:      CONC    ELEV    RURAL    ADJ\_U\*

Upper air station no.: 72797  
Name: QUILLAYUTE  
Year: 2018

First 24 hours of scalar data

| YR     | MO   | DY  | JDY | HR   | H0    | U*    | W*     | DT/DZ  | ZICNV | ZIMCH | M-O    | LEN  | Z0   | BOWEN |
|--------|------|-----|-----|------|-------|-------|--------|--------|-------|-------|--------|------|------|-------|
| ALBEDO | REF  | WS  | WD  | HT   | REF   | TA    | HT     |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 01   | -33.0 | 0.317 | -9.000 | -9.000 | -999. | 429.  | 110.6  | 0.01 | 0.28 |       |
| 1.00   | 5.51 | 67. |     | 10.0 | 275.9 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 02   | -42.0 | 0.403 | -9.000 | -9.000 | -999. | 614.  | 178.7  | 0.07 | 0.28 |       |
| 1.00   | 5.10 | 51. |     | 10.0 | 275.3 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 03   | -42.5 | 0.408 | -9.000 | -9.000 | -999. | 625.  | 183.1  | 0.07 | 0.28 |       |
| 1.00   | 5.16 | 54. |     | 10.0 | 275.3 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 04   | -35.4 | 0.339 | -9.000 | -9.000 | -999. | 477.  | 126.4  | 0.07 | 0.28 |       |
| 1.00   | 4.32 | 50. |     | 10.0 | 275.3 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 05   | -35.2 | 0.337 | -9.000 | -9.000 | -999. | 469.  | 124.6  | 0.07 | 0.28 |       |
| 1.00   | 4.29 | 58. |     | 10.0 | 274.8 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 06   | -36.6 | 0.350 | -9.000 | -9.000 | -999. | 498.  | 135.1  | 0.07 | 0.28 |       |
| 1.00   | 4.46 | 50. |     | 10.0 | 274.8 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 07   | -32.7 | 0.340 | -9.000 | -9.000 | -999. | 475.  | 126.8  | 0.07 | 0.28 |       |
| 0.58   | 4.32 | 51. |     | 10.0 | 274.8 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 08   | -0.5  | 0.283 | -9.000 | -9.000 | -999. | 363.  | 4158.0 | 0.01 | 0.28 |       |
| 0.35   | 4.71 | 62. |     | 10.0 | 276.4 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 09   | 14.1  | 0.378 | 0.287  | 0.007  | 61.   | 558.  | -351.0 | 0.01 | 0.28 |       |
| 0.26   | 6.19 | 68. |     | 10.0 | 277.5 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 10   | 23.1  | 0.354 | 0.427  | 0.008  | 123.  | 506.  | -175.6 | 0.01 | 0.28 |       |
| 0.22   | 5.72 | 63. |     | 10.0 | 278.8 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 11   | 25.3  | 0.448 | 0.480  | 0.010  | 160.  | 720.  | -325.6 | 0.01 | 0.28 |       |
| 0.21   | 7.33 | 72. |     | 10.0 | 279.2 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 12   | 20.7  | 0.394 | 0.464  | 0.008  | 176.  | 597.  | -270.7 | 0.01 | 0.28 |       |
| 0.23   | 6.43 | 65. |     | 10.0 | 280.3 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 13   | 9.6   | 0.397 | 0.365  | 0.008  | 184.  | 599.  | -591.9 | 0.01 | 0.28 |       |
| 0.28   | 6.53 | 73. |     | 10.0 | 280.3 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 14   | -19.9 | 0.452 | -9.000 | -9.000 | -999. | 729.  | 426.1  | 0.07 | 0.28 |       |
| 0.41   | 5.60 | 59. |     | 10.0 | 278.8 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 15   | -33.5 | 0.324 | -9.000 | -9.000 | -999. | 454.  | 115.3  | 0.01 | 0.28 |       |
| 1.00   | 5.62 | 72. |     | 10.0 | 278.1 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 16   | -32.9 | 0.317 | -9.000 | -9.000 | -999. | 429.  | 110.7  | 0.01 | 0.28 |       |
| 1.00   | 5.51 | 71. |     | 10.0 | 277.5 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 17   | -25.5 | 0.246 | -9.000 | -9.000 | -999. | 295.  | 66.7   | 0.01 | 0.28 |       |
| 1.00   | 4.32 | 62. |     | 10.0 | 277.0 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 18   | -30.6 | 0.295 | -9.000 | -9.000 | -999. | 385.  | 95.7   | 0.01 | 0.28 |       |
| 1.00   | 5.14 | 62. |     | 10.0 | 277.5 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 19   | -35.3 | 0.340 | -9.000 | -9.000 | -999. | 476.  | 127.2  | 0.01 | 0.28 |       |
| 1.00   | 5.89 | 66. |     | 10.0 | 276.4 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 20   | -39.1 | 0.376 | -9.000 | -9.000 | -999. | 552.  | 155.2  | 0.01 | 0.28 |       |
| 1.00   | 6.48 | 67. |     | 10.0 | 276.4 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 21   | -31.0 | 0.298 | -9.000 | -9.000 | -999. | 394.  | 97.7   | 0.01 | 0.28 |       |
| 1.00   | 5.19 | 65. |     | 10.0 | 276.4 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 22   | -29.6 | 0.285 | -9.000 | -9.000 | -999. | 365.  | 89.2   | 0.01 | 0.28 |       |
| 1.00   | 4.97 | 62. |     | 10.0 | 276.4 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 23   | -31.5 | 0.303 | -9.000 | -9.000 | -999. | 400.  | 100.8  | 0.01 | 0.28 |       |

1.00 5.27 61. 10.0 276.4 2.0  
 18 01 01 1 24 -31.5 0.304 -9.000 -9.000 -999. 402. 101.6 0.01 0.28  
 1.00 5.29 63. 10.0 277.0 2.0

First hour of profile data

YR MO DY HR HEIGHT F WDIR WSPD AMB\_TMP sigmaA sigmaW sigmaV  
 18 01 01 01 10.0 1 67. 5.51 276.0 99.0 -99.00 -99.00

F indicates top of profile (=1) or below (=0)

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*

07/13/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*

\*\*\* 12:02:54

PAGE 4

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF HIGHEST 24-HR

RESULTS \*\*\*

\*\* CONC OF PM-10 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID                      |      | NETWORK            |          | DATE              | RECEPTOR   |
|-------------------------------|------|--------------------|----------|-------------------|------------|
| (XR, YR, ZELEV, ZHILL, ZFLAG) |      | AVERAGE CONC       | GRID-ID  | (YYMMDDHH)        |            |
|                               |      | OF TYPE            |          |                   |            |
| EG                            | HIGH | 1ST HIGH VALUE IS  | 0.14237  | ON 18010824: AT ( | 430206.98, |
| 5202890.68,                   |      | 5.02, 5.02, 0.00)  | DC       |                   |            |
|                               | HIGH | 6TH HIGH VALUE IS  | 0.10917  | ON 18010824: AT ( | 430237.07, |
| 5202886.76,                   |      | 4.99, 4.99, 0.00)  | DC       |                   |            |
| EP01                          | HIGH | 1ST HIGH VALUE IS  | 13.53708 | ON 18010824: AT ( | 430188.78, |
| 5202965.50,                   |      | 4.77, 92.43, 0.00) | DC       |                   |            |
|                               | HIGH | 6TH HIGH VALUE IS  | 10.21316 | ON 18122224: AT ( | 430190.45, |
| 5202952.82,                   |      | 5.21, 92.43, 0.00) | DC       |                   |            |
| EP02                          | HIGH | 1ST HIGH VALUE IS  | 5.10098  | ON 21121724: AT ( | 430176.34, |
| 5203053.00,                   |      | 5.12, 92.43, 0.00) | DC       |                   |            |
|                               | HIGH | 6TH HIGH VALUE IS  | 3.90770  | ON 19110924: AT ( | 430188.78, |
| 5203040.50,                   |      | 4.68, 92.43, 0.00) | DC       |                   |            |
| EP03                          | HIGH | 1ST HIGH VALUE IS  | 5.13034  | ON 21121724: AT ( | 430188.78, |
| 5203053.00,                   |      | 4.70, 92.43, 0.00) | DC       |                   |            |

|                  |      |                   |          |                   |            |
|------------------|------|-------------------|----------|-------------------|------------|
| 5203040.50,      | HIGH | 6TH HIGH VALUE IS | 3.94270  | ON 19121024: AT ( | 430188.78, |
|                  |      | 4.68, 92.43,      | 0.00)    | DC                |            |
| EP04 5203787.50, | HIGH | 1ST HIGH VALUE IS | 11.06247 | ON 18081124: AT ( | 430188.97, |
|                  |      | 69.43, 92.43,     | 0.00)    | DC                |            |
| 5203862.50,      | HIGH | 6TH HIGH VALUE IS | 6.06878  | ON 19123024: AT ( | 430478.81, |
|                  |      | 68.62, 92.43,     | 0.00)    | DC                |            |
| EP05 5203040.50, | HIGH | 1ST HIGH VALUE IS | 0.36411  | ON 19110924: AT ( | 430188.78, |
|                  |      | 4.68, 92.43,      | 0.00)    | DC                |            |
| 5203021.69,      | HIGH | 6TH HIGH VALUE IS | 0.24667  | ON 19120324: AT ( | 430191.48, |
|                  |      | 4.36, 92.43,      | 0.00)    | DC                |            |
| EP06 5203040.50, | HIGH | 1ST HIGH VALUE IS | 0.35753  | ON 19110924: AT ( | 430188.78, |
|                  |      | 4.68, 92.43,      | 0.00)    | DC                |            |
| 5203021.69,      | HIGH | 6TH HIGH VALUE IS | 0.24463  | ON 19122924: AT ( | 430191.48, |
|                  |      | 4.36, 92.43,      | 0.00)    | DC                |            |
| EP08 5203151.14, | HIGH | 1ST HIGH VALUE IS | 3.06648  | ON 20010624: AT ( | 430713.97, |
|                  |      | 4.86, 92.43,      | 0.00)    | DC                |            |
| 5203079.01,      | HIGH | 6TH HIGH VALUE IS | 2.27580  | ON 19120224: AT ( | 430194.80, |
|                  |      | 4.42, 92.43,      | 0.00)    | DC                |            |
| EP09 5203077.94, | HIGH | 1ST HIGH VALUE IS | 0.50520  | ON 18081224: AT ( | 430713.77, |
|                  |      | 5.23, 92.43,      | 0.00)    | DC                |            |
| 5203016.94,      | HIGH | 6TH HIGH VALUE IS | 0.39333  | ON 22102124: AT ( | 430744.02, |
|                  |      | 5.14, 92.43,      | 0.00)    | DC                |            |
| EP10 5203102.34, | HIGH | 1ST HIGH VALUE IS | 6.60974  | ON 18060324: AT ( | 430713.84, |
|                  |      | 5.03, 92.43,      | 0.00)    | DC                |            |
| 5203067.94,      | HIGH | 6TH HIGH VALUE IS | 5.32779  | ON 20052924: AT ( | 430715.77, |
|                  |      | 5.15, 92.43,      | 0.00)    | DC                |            |
| EP11 5203102.34, | HIGH | 1ST HIGH VALUE IS | 5.26853  | ON 18060324: AT ( | 430713.84, |
|                  |      | 5.03, 92.43,      | 0.00)    | DC                |            |
| 5203114.54,      | HIGH | 6TH HIGH VALUE IS | 4.66711  | ON 20070224: AT ( | 430713.87, |
|                  |      | 4.99, 92.43,      | 0.00)    | DC                |            |
| EP12 5203115.00, | HIGH | 1ST HIGH VALUE IS | 2.64842  | ON 22102124: AT ( | 430735.81, |
|                  |      | 4.52, 92.43,      | 0.00)    | DC                |            |
| 5203057.94,      | HIGH | 6TH HIGH VALUE IS | 1.87171c | ON 22090724: AT ( | 430717.77, |
|                  |      | 5.11, 92.43,      | 0.00)    | DC                |            |
| EP13 5203090.14, | HIGH | 1ST HIGH VALUE IS | 7.22745  | ON 18060324: AT ( | 430713.80, |
|                  |      | 5.09, 92.43,      | 0.00)    | DC                |            |
| 5203102.34,      | HIGH | 6TH HIGH VALUE IS | 5.60468  | ON 20070224: AT ( | 430713.84, |
|                  |      | 5.03, 92.43,      | 0.00)    | DC                |            |
| EP14 5203090.14, | HIGH | 1ST HIGH VALUE IS | 5.68117  | ON 18060324: AT ( | 430713.80, |
|                  |      | 5.09, 92.43,      | 0.00)    | DC                |            |



HIGH 6TH HIGH VALUE IS 5.11478 ON 20073124: AT ( 430713.84,  
5203102.34, 5.03, 92.43, 0.00) DC

FEL\_P1 HIGH 1ST HIGH VALUE IS 53.27246 ON 19110924: AT ( 430198.02,  
5203140.98, 4.33, 92.43, 0.00) DC

HIGH 6TH HIGH VALUE IS 33.90110 ON 19111224: AT ( 430198.02,  
5203140.98, 4.33, 92.43, 0.00) DC

FEL\_P2 HIGH 1ST HIGH VALUE IS 28.27852 ON 19110924: AT ( 430194.16,  
5203066.62, 4.29, 92.43, 0.00) DC

HIGH 6TH HIGH VALUE IS 17.88216 ON 20102624: AT ( 430193.52,  
5203054.23, 4.25, 92.43, 0.00) DC

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/13/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*

\*\*\* 12:02:54

PAGE 5

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF HIGHEST 24-HR

RESULTS \*\*\*

\*\* CONC OF PM-10 IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID                      | NETWORK                         | DATE       | RECEPTOR  |
|-------------------------------|---------------------------------|------------|-----------|
| (XR, YR, ZELEV, ZHILL, ZFLAG) | AVERAGE CONC<br>OF TYPE GRID-ID | (HYMMDDHH) |           |
| - - - - -                     | - - - - -                       | - - - - -  | - - - - - |
| - - - - -                     | - - - - -                       | - - - - -  | - - - - - |

FEL\_P3 HIGH 1ST HIGH VALUE IS 22.42140 ON 19110924: AT ( 430188.78,  
5202990.50, 4.68, 92.43, 0.00) DC

HIGH 6TH HIGH VALUE IS 14.30871 ON 20102624: AT ( 430188.78,  
5202978.00, 4.73, 92.43, 0.00) DC

LOAD\_P HIGH 1ST HIGH VALUE IS 0.33401 ON 19110924: AT ( 430196.09,  
5203103.80, 4.32, 92.43, 0.00) DC

HIGH 6TH HIGH VALUE IS 0.21315 ON 21012024: AT ( 430195.44,  
5203091.41, 4.39, 92.43, 0.00) DC

PILE1 HIGH 1ST HIGH VALUE IS 18.07892 ON 19110924: AT ( 430199.94,  
5203178.16, 4.29, 92.43, 0.00) DC

HIGH 6TH HIGH VALUE IS 12.14224 ON 20120324: AT ( 430199.30,  
5203165.77, 4.48, 92.43, 0.00) DC

|             |                   |          |                   |            |
|-------------|-------------------|----------|-------------------|------------|
| PILE2 HIGH  | 1ST HIGH VALUE IS | 21.13546 | ON 19110924: AT ( | 430188.78, |
| 5203040.50, | 4.68, 92.43,      | 0.00) DC |                   |            |
| HIGH        | 6TH HIGH VALUE IS | 14.63581 | ON 19111224: AT ( | 430188.78, |
| 5203040.50, | 4.68, 92.43,      | 0.00) DC |                   |            |
| PILE3 HIGH  | 1ST HIGH VALUE IS | 18.30004 | ON 19110924: AT ( | 430190.45, |
| 5202952.82, | 5.21, 92.43,      | 0.00) DC |                   |            |
| HIGH        | 6TH HIGH VALUE IS | 12.81595 | ON 20120324: AT ( | 430190.45, |
| 5202952.82, | 5.21, 92.43,      | 0.00) DC |                   |            |
| T_P HIGH    | 1ST HIGH VALUE IS | 3.19693  | ON 22121224: AT ( | 430401.24, |
| 5202869.68, | 5.67, 5.67,       | 0.00) DC |                   |            |
| HIGH        | 6TH HIGH VALUE IS | 2.38276  | ON 18122424: AT ( | 430401.24, |
| 5202869.68, | 5.67, 5.67,       | 0.00) DC |                   |            |
| T_P1 HIGH   | 1ST HIGH VALUE IS | 16.76364 | ON 19122724: AT ( | 430196.73, |
| 5203116.20, | 4.25, 92.43,      | 0.00) DC |                   |            |
| HIGH        | 6TH HIGH VALUE IS | 13.36307 | ON 22120624: AT ( | 430196.73, |
| 5203116.20, | 4.25, 92.43,      | 0.00) DC |                   |            |
| T_P1EX HIGH | 1ST HIGH VALUE IS | 14.11413 | ON 19110924: AT ( | 430210.43, |
| 5203290.86, | 4.37, 92.43,      | 0.00) DC |                   |            |
| HIGH        | 6TH HIGH VALUE IS | 10.08010 | ON 20120324: AT ( | 430210.43, |
| 5203290.86, | 4.37, 92.43,      | 0.00) DC |                   |            |
| T_P2 HIGH   | 1ST HIGH VALUE IS | 9.32573  | ON 19122724: AT ( | 430194.80, |
| 5203079.01, | 4.42, 92.43,      | 0.00) DC |                   |            |
| HIGH        | 6TH HIGH VALUE IS | 7.48887  | ON 22102924: AT ( | 430194.80, |
| 5203079.01, | 4.42, 92.43,      | 0.00) DC |                   |            |
| T_P2EX HIGH | 1ST HIGH VALUE IS | 7.46022  | ON 19110924: AT ( | 430210.43, |
| 5203290.86, | 4.37, 92.43,      | 0.00) DC |                   |            |
| HIGH        | 6TH HIGH VALUE IS | 5.32952  | ON 20120324: AT ( | 430210.43, |
| 5203290.86, | 4.37, 92.43,      | 0.00) DC |                   |            |
| T_P3 HIGH   | 1ST HIGH VALUE IS | 9.59991  | ON 19110924: AT ( | 430190.67, |
| 5203001.72, | 4.41, 92.43,      | 0.00) DC |                   |            |
| HIGH        | 6TH HIGH VALUE IS | 6.88169  | ON 20120324: AT ( | 430190.67, |
| 5203001.72, | 4.41, 92.43,      | 0.00) DC |                   |            |
| T_P3EX HIGH | 1ST HIGH VALUE IS | 5.90165  | ON 19110924: AT ( | 430210.43, |
| 5203290.86, | 4.37, 92.43,      | 0.00) DC |                   |            |
| HIGH        | 6TH HIGH VALUE IS | 4.21596  | ON 20120324: AT ( | 430210.43, |
| 5203290.86, | 4.37, 92.43,      | 0.00) DC |                   |            |
| T_PEX HIGH  | 1ST HIGH VALUE IS | 9.69190  | ON 19110924: AT ( | 430210.43, |
| 5203290.86, | 4.37, 92.43,      | 0.00) DC |                   |            |
| HIGH        | 6TH HIGH VALUE IS | 6.65653  | ON 20102624: AT ( | 430210.43, |
| 5203290.86, | 4.37, 92.43,      | 0.00) DC |                   |            |

ALL HIGH 1ST HIGH VALUE IS 95.17407 ON 19110924: AT ( 430188.78,  
5203127.50, 4.71, 92.43, 0.00) DC  
HIGH 6TH HIGH VALUE IS 79.82504 ON 19120324: AT ( 430188.78,  
5203077.50, 4.73, 92.43, 0.00) DC

\*\*\* RECEPTOR TYPES: GC = GRIDCART  
GP = GRIDPOLR  
DC = DISCCART  
DP = DISCPOLR

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*

07/13/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*  
\*\*\* 12:02:54

PAGE 6

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* Message Summary : AERMOD Model Execution \*\*\*

----- Summary of Total Messages -----

A Total of 0 Fatal Error Message(s)  
A Total of 2 Warning Message(s)  
A Total of 758 Informational Message(s)

A Total of 43824 Hours Were Processed

A Total of 398 Calm Hours Identified

A Total of 360 Missing Hours Identified ( 0.82 Percent)

\*\*\*\*\* FATAL ERROR MESSAGES \*\*\*\*\*  
\*\*\* NONE \*\*\*

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*  
SO W320 1503 PPARM: Input Parameter May Be Out-of-Range for Parameter  
VS  
ME W187 13687 MEOPEN: ADJ\_U\* Option for Stable Low Winds used in AERMET

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/05/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*  
\*\*\* 13:10:17

PAGE 1

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* MODEL SETUP OPTIONS SUMMARY

\*\*\*

- - - - -  
- - - - -

\*\* Model Options Selected:

- \* Model Allows User-Specified Options
- \* Model Is Setup For Calculation of Average CONCentration Values.
- \* NO GAS DEPOSITION Data Provided.
- \* NO PARTICLE DEPOSITION Data Provided.
- \* Model Uses NO DRY DEPLETION. DDPLETE = F
- \* Model Uses NO WET DEPLETION. WETDPLT = F
- \* Stack-tip Downwash.
- \* Model Accounts for ELEVated Terrain Effects.
- \* Use Calms Processing Routine.
- \* Use Missing Data Processing Routine.
- \* No Exponential Decay.
- \* Model Uses RURAL Dispersion Only.
- \* ADJ\_U\* - Use ADJ\_U\* option for SBL in AERMET
- \* CCVR\_Sub - Meteorological data includes CCVR substitutions
- \* TEMP\_Sub - Meteorological data includes TEMP substitutions
- \* Model Assumes No FLAGPOLE Receptor Heights.
- \* The User Specified a Pollutant Type of: TAP

\*\*Model Calculates 2 Short Term Average(s) of: 1-HR 24-HR  
and Calculates ANNUAL Averages

\*\*This Run Includes: 3 Source(s); 4 Source Group(s); and 11358  
Receptor(s)

with: 3 POINT(s), including  
0 POINTCAP(s) and 0 POINTHOR(s)  
and: 0 VOLUME source(s)  
and: 0 AREA type source(s)  
and: 0 LINE source(s)  
and: 0 RLINE/RLINEXT source(s)  
and: 0 OPENPIT source(s)  
and: 0 BUOYANT LINE source(s) with a total of 0 line(s)  
and: 0 SWPOINT source(s)

[illegible]

NOTE: METEOROLOGICAL DATA ACTUALLY PROCESSED WILL ALSO DEPEND ON WHAT IS INCLUDED IN THE DATA FILE.

10.80, 1.54, 3.09, 5.14, 8.23,

\*\*\* MODELOPTS:      CONC    ELEV    RURAL    ADJ\_U\*

Upper air station no.: 72797  
Name: QUILLAYUTE  
Year: 2018

First 24 hours of scalar data

| YR     | MO   | DY  | JDY | HR   | H0    | U*    | W*     | DT/DZ  | ZICNV | ZIMCH | M-O    | LEN  | Z0   | BOWEN |
|--------|------|-----|-----|------|-------|-------|--------|--------|-------|-------|--------|------|------|-------|
| ALBEDO | REF  | WS  | WD  | HT   | REF   | TA    | HT     |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 01   | -33.0 | 0.317 | -9.000 | -9.000 | -999. | 429.  | 110.6  | 0.01 | 0.28 |       |
| 1.00   | 5.51 | 67. |     | 10.0 | 275.9 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 02   | -42.0 | 0.403 | -9.000 | -9.000 | -999. | 614.  | 178.7  | 0.07 | 0.28 |       |
| 1.00   | 5.10 | 51. |     | 10.0 | 275.3 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 03   | -42.5 | 0.408 | -9.000 | -9.000 | -999. | 625.  | 183.1  | 0.07 | 0.28 |       |
| 1.00   | 5.16 | 54. |     | 10.0 | 275.3 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 04   | -35.4 | 0.339 | -9.000 | -9.000 | -999. | 477.  | 126.4  | 0.07 | 0.28 |       |
| 1.00   | 4.32 | 50. |     | 10.0 | 275.3 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 05   | -35.2 | 0.337 | -9.000 | -9.000 | -999. | 469.  | 124.6  | 0.07 | 0.28 |       |
| 1.00   | 4.29 | 58. |     | 10.0 | 274.8 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 06   | -36.6 | 0.350 | -9.000 | -9.000 | -999. | 498.  | 135.1  | 0.07 | 0.28 |       |
| 1.00   | 4.46 | 50. |     | 10.0 | 274.8 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 07   | -32.7 | 0.340 | -9.000 | -9.000 | -999. | 475.  | 126.8  | 0.07 | 0.28 |       |
| 0.58   | 4.32 | 51. |     | 10.0 | 274.8 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 08   | -0.5  | 0.283 | -9.000 | -9.000 | -999. | 363.  | 4158.0 | 0.01 | 0.28 |       |
| 0.35   | 4.71 | 62. |     | 10.0 | 276.4 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 09   | 14.1  | 0.378 | 0.287  | 0.007  | 61.   | 558.  | -351.0 | 0.01 | 0.28 |       |
| 0.26   | 6.19 | 68. |     | 10.0 | 277.5 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 10   | 23.1  | 0.354 | 0.427  | 0.008  | 123.  | 506.  | -175.6 | 0.01 | 0.28 |       |
| 0.22   | 5.72 | 63. |     | 10.0 | 278.8 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 11   | 25.3  | 0.448 | 0.480  | 0.010  | 160.  | 720.  | -325.6 | 0.01 | 0.28 |       |
| 0.21   | 7.33 | 72. |     | 10.0 | 279.2 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 12   | 20.7  | 0.394 | 0.464  | 0.008  | 176.  | 597.  | -270.7 | 0.01 | 0.28 |       |
| 0.23   | 6.43 | 65. |     | 10.0 | 280.3 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 13   | 9.6   | 0.397 | 0.365  | 0.008  | 184.  | 599.  | -591.9 | 0.01 | 0.28 |       |
| 0.28   | 6.53 | 73. |     | 10.0 | 280.3 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 14   | -19.9 | 0.452 | -9.000 | -9.000 | -999. | 729.  | 426.1  | 0.07 | 0.28 |       |
| 0.41   | 5.60 | 59. |     | 10.0 | 278.8 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 15   | -33.5 | 0.324 | -9.000 | -9.000 | -999. | 454.  | 115.3  | 0.01 | 0.28 |       |
| 1.00   | 5.62 | 72. |     | 10.0 | 278.1 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 16   | -32.9 | 0.317 | -9.000 | -9.000 | -999. | 429.  | 110.7  | 0.01 | 0.28 |       |
| 1.00   | 5.51 | 71. |     | 10.0 | 277.5 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 17   | -25.5 | 0.246 | -9.000 | -9.000 | -999. | 295.  | 66.7   | 0.01 | 0.28 |       |
| 1.00   | 4.32 | 62. |     | 10.0 | 277.0 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 18   | -30.6 | 0.295 | -9.000 | -9.000 | -999. | 385.  | 95.7   | 0.01 | 0.28 |       |
| 1.00   | 5.14 | 62. |     | 10.0 | 277.5 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 19   | -35.3 | 0.340 | -9.000 | -9.000 | -999. | 476.  | 127.2  | 0.01 | 0.28 |       |
| 1.00   | 5.89 | 66. |     | 10.0 | 276.4 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 20   | -39.1 | 0.376 | -9.000 | -9.000 | -999. | 552.  | 155.2  | 0.01 | 0.28 |       |
| 1.00   | 6.48 | 67. |     | 10.0 | 276.4 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 21   | -31.0 | 0.298 | -9.000 | -9.000 | -999. | 394.  | 97.7   | 0.01 | 0.28 |       |
| 1.00   | 5.19 | 65. |     | 10.0 | 276.4 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 22   | -29.6 | 0.285 | -9.000 | -9.000 | -999. | 365.  | 89.2   | 0.01 | 0.28 |       |
| 1.00   | 4.97 | 62. |     | 10.0 | 276.4 | 2.0   |        |        |       |       |        |      |      |       |
| 18     | 01   | 01  | 1   | 23   | -31.5 | 0.303 | -9.000 | -9.000 | -999. | 400.  | 100.8  | 0.01 | 0.28 |       |

```

1.00    5.27    61.    10.0  276.4    2.0
  18 01 01    1 24  -31.5  0.304 -9.000 -9.000 -999.  402.    101.6  0.01    0.28
1.00    5.29    63.    10.0  277.0    2.0

```

First hour of profile data

```

YR MO DY HR HEIGHT F  WDIR    WSPD AMB_TMP sigmaA  sigmaW  sigmaV
18 01 01 01    10.0 1   67.    5.51  276.0   99.0  -99.00 -99.00

```

F indicates top of profile (=1) or below (=0)

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*

07/05/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*

\*\*\* 13:10:17

PAGE 4

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF MAXIMUM ANNUAL RESULTS

AVERAGED OVER 5 YEARS \*\*\*

\*\* CONC OF TAP IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID      | NETWORK              | AVERAGE CONC                         | RECEPTOR (XR, YR, ZELEV, |
|---------------|----------------------|--------------------------------------|--------------------------|
| ZHILL, ZFLAG) | OF TYPE GRID-ID      |                                      |                          |
| EG            | 1ST HIGHEST VALUE IS | 15.27243 AT ( 430188.78, 5202928.50, | 4.81,                    |
| 5.40,         | 0.00) DC             |                                      |                          |
|               | 2ND HIGHEST VALUE IS | 15.24241 AT ( 430190.34, 5202928.38, | 4.63,                    |
| 5.40,         | 0.00) DC             |                                      |                          |
|               | 3RD HIGHEST VALUE IS | 15.16923 AT ( 430188.78, 5202916.00, | 4.78,                    |
| 4.78,         | 0.00) DC             |                                      |                          |
|               | 4TH HIGHEST VALUE IS | 15.12195 AT ( 430190.29, 5202916.15, | 4.59,                    |
| 5.41,         | 0.00) DC             |                                      |                          |
|               | 5TH HIGHEST VALUE IS | 15.09059 AT ( 430176.34, 5202916.00, | 5.53,                    |
| 5.53,         | 0.00) DC             |                                      |                          |
|               | 6TH HIGHEST VALUE IS | 15.06984 AT ( 430190.40, 5202940.60, | 4.77,                    |
| 5.44,         | 0.00) DC             |                                      |                          |
|               | 7TH HIGHEST VALUE IS | 15.06891 AT ( 430188.78, 5202941.00, | 4.95,                    |
| 4.95,         | 0.00) DC             |                                      |                          |
|               | 8TH HIGHEST VALUE IS | 15.04053 AT ( 430176.34, 5202928.50, | 5.54,                    |
| 5.54,         | 0.00) DC             |                                      |                          |
|               | 9TH HIGHEST VALUE IS | 14.89514 AT ( 430176.34, 5202903.50, | 5.56,                    |



|      |                       |               |                        |       |
|------|-----------------------|---------------|------------------------|-------|
|      | 5.56, 0.00) DC        |               |                        |       |
|      | 10TH HIGHEST VALUE IS | 14.85942 AT ( | 430188.78, 5202903.50, | 4.79, |
|      | 4.79, 0.00) DC        |               |                        |       |
| EP04 | 1ST HIGHEST VALUE IS  | 0.26641 AT (  | 430797.97, 5203015.50, | 6.01, |
|      | 6.01, 0.00) DC        |               |                        |       |
|      | 2ND HIGHEST VALUE IS  | 0.26518 AT (  | 430847.69, 5203003.00, | 5.45, |
|      | 5.45, 0.00) DC        |               |                        |       |
|      | 3RD HIGHEST VALUE IS  | 0.26518 AT (  | 430822.84, 5203040.50, | 5.93, |
|      | 7.90, 0.00) DC        |               |                        |       |
|      | 4TH HIGHEST VALUE IS  | 0.26506 AT (  | 430835.28, 5202990.50, | 5.59, |
|      | 6.29, 0.00) DC        |               |                        |       |
|      | 5TH HIGHEST VALUE IS  | 0.26472 AT (  | 430810.41, 5203040.50, | 6.01, |
|      | 7.15, 0.00) DC        |               |                        |       |
|      | 6TH HIGHEST VALUE IS  | 0.26471 AT (  | 430835.28, 5203003.00, | 5.28, |
|      | 6.29, 0.00) DC        |               |                        |       |
|      | 7TH HIGHEST VALUE IS  | 0.26429 AT (  | 430810.41, 5203028.00, | 5.56, |
|      | 5.56, 0.00) DC        |               |                        |       |
|      | 8TH HIGHEST VALUE IS  | 0.26421 AT (  | 430822.84, 5203003.00, | 5.23, |
|      | 5.23, 0.00) DC        |               |                        |       |
|      | 9TH HIGHEST VALUE IS  | 0.26409 AT (  | 430847.69, 5202990.50, | 5.48, |
|      | 5.48, 0.00) DC        |               |                        |       |
|      | 10TH HIGHEST VALUE IS | 0.26330 AT (  | 430835.28, 5203015.50, | 4.98, |
|      | 4.98, 0.00) DC        |               |                        |       |
| EP08 | 1ST HIGHEST VALUE IS  | 1.52297 AT (  | 430192.23, 5203029.44, | 4.28, |
|      | 92.43, 0.00) DC       |               |                        |       |
|      | 2ND HIGHEST VALUE IS  | 1.52003 AT (  | 430191.48, 5203021.69, | 4.36, |
|      | 92.43, 0.00) DC       |               |                        |       |
|      | 3RD HIGHEST VALUE IS  | 1.51321 AT (  | 430190.73, 5203013.94, | 4.44, |
|      | 92.43, 0.00) DC       |               |                        |       |
|      | 4TH HIGHEST VALUE IS  | 1.50914 AT (  | 430188.78, 5203028.00, | 4.70, |
|      | 92.43, 0.00) DC       |               |                        |       |
|      | 5TH HIGHEST VALUE IS  | 1.50814 AT (  | 430188.78, 5203015.50, | 4.70, |
|      | 92.43, 0.00) DC       |               |                        |       |
|      | 6TH HIGHEST VALUE IS  | 1.50618 AT (  | 430192.87, 5203041.83, | 4.23, |
|      | 92.43, 0.00) DC       |               |                        |       |
|      | 7TH HIGHEST VALUE IS  | 1.50448 AT (  | 430188.78, 5203040.50, | 4.68, |
|      | 92.43, 0.00) DC       |               |                        |       |
|      | 8TH HIGHEST VALUE IS  | 1.48958 AT (  | 430193.52, 5203054.23, | 4.25, |
|      | 92.43, 0.00) DC       |               |                        |       |
|      | 9TH HIGHEST VALUE IS  | 1.48880 AT (  | 430188.78, 5203003.00, | 4.68, |
|      | 92.43, 0.00) DC       |               |                        |       |
|      | 10TH HIGHEST VALUE IS | 1.48833 AT (  | 430190.67, 5203001.72, | 4.41, |
|      | 92.43, 0.00) DC       |               |                        |       |
| ALL  | 1ST HIGHEST VALUE IS  | 16.57903 AT ( | 430188.78, 5202928.50, | 4.81, |
|      | 5.40, 0.00) DC        |               |                        |       |
|      | 2ND HIGHEST VALUE IS  | 16.53791 AT ( | 430190.34, 5202928.38, | 4.63, |
|      | 5.40, 0.00) DC        |               |                        |       |

```
*** RECEPTOR TYPES:  GC = GRIDCART
                        GP = GRIDPOLR
                        DC = DISCCART
                        DP = DISCPOLR
```

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/05/23

PAGE 5

## RESULTS \*\*\*

\*\*\*

EP04 HIGH 1ST HIGH VALUE IS 86.41408 ON 21062719: AT ( 430164.06,  
5203787.50, 68.49, 92.43, 0.00) DC

EP08 HIGH 1ST HIGH VALUE IS 33.00423 ON 19082924: AT ( 430748.25,  
5203500.50, 4.25, 92.43, 0.00) DC

ALL HIGH 1ST HIGH VALUE IS 584.39295 ON 20100203: AT ( 430213.66,  
5202866.50, 5.56, 5.56, 0.00) DC

\*\*\* RECEPTOR TYPES: GC = GRIDCART  
GP = GRIDPOLR  
DC = DISCCART  
DP = DISCPOLR

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*  
07/05/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*  
\*\*\* 13:10:17

PAGE 6

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* THE SUMMARY OF HIGHEST 24-HR

RESULTS \*\*\*

\*\* CONC OF TAP IN MICROGRAMS/M\*\*3

\*\*

| GROUP ID                      | DATE       | RECEPTOR |
|-------------------------------|------------|----------|
| (XR, YR, ZELEV, ZHILL, ZFLAG) | (YYMMDDHH) |          |
| AVERAGE CONC                  | NETWORK    |          |
| OF TYPE                       | GRID-ID    |          |
| -----                         | -----      | -----    |
| -----                         | -----      | -----    |

EG HIGH 1ST HIGH VALUE IS 164.01279 ON 18010824: AT ( 430206.98,  
5202890.68, 5.02, 5.02, 0.00) DC

HIGH 6TH HIGH VALUE IS 125.75817 ON 18010824: AT ( 430237.07,  
5202886.76, 4.99, 4.99, 0.00) DC

EP04 HIGH 1ST HIGH VALUE IS 6.89011 ON 18081124: AT ( 430188.97,  
5203787.50, 69.43, 92.43, 0.00) DC

HIGH 6TH HIGH VALUE IS 3.77986 ON 19123024: AT ( 430478.81,  
5203862.50, 68.62, 92.43, 0.00) DC

EP08 HIGH 1ST HIGH VALUE IS 12.85289 ON 20010624: AT ( 430713.97,  
5203151.14, 4.86, 92.43, 0.00) DC

HIGH 6TH HIGH VALUE IS 9.53884 ON 19120224: AT ( 430194.80,  
5203079.01, 4.42, 92.43, 0.00) DC

ALL HIGH 1ST HIGH VALUE IS 171.46792 ON 18010824: AT ( 430206.98,  
5202890.68, 5.02, 5.02, 0.00) DC  
HIGH 6TH HIGH VALUE IS 131.55741 ON 18122524: AT ( 430237.07,  
5202886.76, 4.99, 4.99, 0.00) DC

\*\*\* RECEPTOR TYPES: GC = GRIDCART  
GP = GRIDPOLR  
DC = DISCCART  
DP = DISCPOLR

▲ \*\*\* AERMOD - VERSION 22112 \*\*\* \*\*\*

C:\MODEL\HOQUIAMPROJECT\HOQUIAMPROJECT\_PM2P5-ANNUAL\HOQUIAMPROJECT\_P \*\*\*

07/05/23

\*\*\* AERMET - VERSION 22112 \*\*\* \*\*\*  
\*\*\* 13:10:17

PAGE 7

\*\*\* MODELOPTs: CONC ELEV RURAL ADJ\_U\*

\*\*\* Message Summary : AERMOD Model Execution \*\*\*

----- Summary of Total Messages -----

A Total of 0 Fatal Error Message(s)  
A Total of 2 Warning Message(s)  
A Total of 758 Informational Message(s)

A Total of 43824 Hours Were Processed

A Total of 398 Calm Hours Identified

A Total of 360 Missing Hours Identified ( 0.82 Percent)

\*\*\*\*\* FATAL ERROR MESSAGES \*\*\*\*\*  
\*\*\* NONE \*\*\*

\*\*\*\*\* WARNING MESSAGES \*\*\*\*\*  
SO W320 44 PPARM: Input Parameter May Be Out-of-Range for Parameter  
VS  
ME W187 11559 MEOPEN: ADJ\_U\* Option for Stable Low Winds used in AERMET

# Appendix A

## **NOC Application Forms and SEPA Documentation**

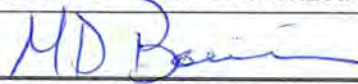
# OLYMPIC REGION CLEAN AIR AGENCY

2940 Limited Lane NW - Olympia, Washington 98502 - 360-539-7610 – Fax 360-491-6308

## FORM 1- NOTICE OF CONSTRUCTION TO CONSTRUCT - INSTALL - ESTABLISH OR MODIFY AN AIR CONTAMINANT SOURCE

### Form 1 Instructions:

1. Please complete all the fields below. **This NOC application is considered incomplete until signed.**
2. If the application contains any confidential business information, please complete a Request of Confidentiality of Records ([www.orcaa.org](http://www.orcaa.org)).
3. Duty to Correction Application: An applicant has the duty to supplement or correct an application. Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application must, upon becoming aware of such failure or incorrect submittal, promptly submit supplementary factors or corrected information.

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |                                                                                                            |  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|------------------------------------------------------------------------------------------------------------|--|
| Business Name:<br><b>Pacific Northwest Renewable Energy</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |  | <b>For ORCAA use only</b>                                                                                  |  |
| Mailing Address:<br>P.O. Box 391, Sth Egremment, MA 01258                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |  | File No: <u>432</u><br>County No: <u>27</u><br>Source No: <u>926</u><br>Application No: <u>23 NOC 1606</u> |  |
| Physical Address of Project or New Source:<br>411 Moon Island Road, Hoquiam, WA 98550                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |  | Date Received:                                                                                             |  |
| Billing Address:<br>P.O. Box 391, Sth Egremment, MA 01258                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |  | <b>Received</b><br><b>JUL 20 2023</b><br><b>ORCAA</b>                                                      |  |
| Project or Equipment to be installed/established:<br><br>Wood pellet manufacturing facility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |  |                                                                                                            |  |
| Anticipated startup date: <u>02</u> / <u>01</u> / <u>2025</u> Is facility currently registered with ORCAA? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |  |                                                                                                            |  |
| This project must meet the requirements of the State Environmental Policy Act (SEPA) before ORCAA can issue final approval. Indicate the SEPA compliance option:<br><input type="checkbox"/> SEPA was satisfied by _____ (government agency) on ____/____/____ (date) - Include a copy of the SEPA determination<br><input checked="" type="checkbox"/> SEPA threshold determination by <u>City of Hoquiam</u> (government agency) is pending - Include a copy of the environmental checklist<br><input type="checkbox"/> ORCAA is the only government agency requiring a permit - Include ORCAA Environmental Checklist<br><input type="checkbox"/> This project is exempt from SEPA per _____ (WAC citation). |  |                                                                                                            |  |
| Name of Owner of Business:<br>Farnese Partners, LTD                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |  | Agency Use Only                                                                                            |  |
| Title:<br>Owner                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |                                                                                                            |  |
| Email: <u>pheasman@pnwrenewable.com</u> Phone:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |  |                                                                                                            |  |
| Authorized Representative for Application (if different than owner):<br>Mark Boivin                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |  |                                                                                                            |  |
| Title: CEO                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |  |                                                                                                            |  |
| Email: <u>mboivin@pnwrenewable.com</u> Phone: <u>(413) 244-7360</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |  |                                                                                                            |  |
| I hereby certify that the information contained in this application is, to the best of my knowledge, complete and correct.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |  |                                                                                                            |  |
| Signature of Owner or Authorized Representative: (sign in Blue Ink)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |  |                                                                                                            |  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |  | Date: <u>7/20/23</u>                                                                                       |  |
| <b>IMPORTANT:</b> Do not send via email or other electronic means.<br>ORCAA must receive Original, hardcopy, signed application and payment prior to processing application.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |                                                                                                            |  |



# OLYMPIC REGION CLEAN AIR AGENCY

2940 Limited Lane NW - Olympia, Washington 98502 - 360-539-7610 – Fax 360-491-6308

## FORM 1D- Contact Information

|                                                                                                              |                                                          |
|--------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|
| <b>Business Name</b><br>Pacific Northwest Renewable Energy                                                   | <b>FOR ORCAA USE</b>                                     |
| <b>Physical Site Address (Street address, city, state, zip)</b><br>411 Moon Island Road<br>Hoquiam, WA 98550 | <b>FILE #</b> 432                                        |
|                                                                                                              | <b>CTY #</b> 27                                          |
|                                                                                                              | <b>SRC #</b> 926                                         |
| <b>Previous Business Name (if applicable)</b>                                                                | <b>Date Received</b><br>Received<br>JUL 20 2023<br>ORCAA |

### Contact Information

|                                   |                                   |
|-----------------------------------|-----------------------------------|
| <b>Inspection Contact</b>         |                                   |
| Name Kim Alexander                | Title VP of Operations            |
| Phone (864) 367-2767              | Email kalexander@pnwrenewable.com |
| <b>Billing Contact</b>            |                                   |
| Name Steeve Wintle                | Title CFO                         |
| Phone (207) 651-4580              | Email swintle@pnwrenewable.com    |
| <b>Emission Inventory Contact</b> |                                   |
| Name Kim Alexander                | Title VP of Operations            |
| Phone (864) 367-2767              | Email kalexander@pnwrenewable.com |
| <b>Complaint Contact</b>          |                                   |
| Name Kim Alexander                | Title VP of Operations            |
| Phone (864) 367-2767              | Email kalexander@pnwrenewable.com |
| <b>Permit Contact</b>             |                                   |
| Name Brandon Henderson            | Title Director of Engineering     |
| Phone (254) 813-3260              | Email bhenderson@pnwrenewable.com |

The **inspection contact** is the on-site person responsible for the everyday operation of the site and is available for inspections.

The **billing contact** is the person invoices are sent.

The **emission inventory contact** is the person requests for emissions information and material use information are sent.

The **complaint contact** is the person who receives and responds to complaints received on-site and who is contacted regarding complaints ORCAA receives.

The **permit contact** is the person responsible for filling out permit applications and receiving approval from ORCAA.

# FORM 4

## FACILITY EMISSIONS SUMMARY

Facility: Pacific Northwest Renewable Energy - Port of Grays Harbor Wood Pellet Facility

Page 1 of 3

Instructions: on back.

| Emission Unit ID# | TSP   | PM-10 | SOx  | NOx | VOC | CO |
|-------------------|-------|-------|------|-----|-----|----|
| TD-01             | 0.41  | 0.19  | 0    | 0   | 0   | 0  |
| TD-02             | 0.46  | 0.22  | 0.03 | 0   | 0   | 0  |
| TD-03             | 0.27  | 0.13  | 0    | 0   | 0   | 0  |
| SP-01             | 0.65  | 0.32  | 0.16 | 0   | 0   | 0  |
| SP-02             | 0.65  | 0.32  | 0.16 | 0   | 0   | 0  |
| SP-03             | 0.65  | 0.32  | 0.16 | 0   | 0   | 0  |
| VEH-01            | 10.70 | 3.18  | 0    | 0   | 0   | 0  |
| VEH-02            | 17.69 | 5.29  | 0    | 0   | 0   | 0  |
| EP-01             | 29.81 | 7.45  | 0    | 0   | 0   | 0  |
| EP-02             | 8.38  | 2.10  | 0    | 0   | 0   | 0  |
| EP-03             | 8.38  | 2.10  | 0    | 0   | 0   | 0  |
| Facility Total    |       |       |      |     |     |    |



# FORM 4

## FACILITY EMISSIONS SUMMARY

Facility: Pacific Northwest Renewable Energy - Port of Grays Harbor Wood Pellet Facility

Page 2 of 3

Instructions: on back.

| Emission Unit ID# | TSP   | PM-10 | SOx   | NOx    | VOC   | CO     |
|-------------------|-------|-------|-------|--------|-------|--------|
| EP-04             | 33.88 | 55.81 | 18.05 | 227.76 | 28.80 | 183.96 |
| EP-05             | 0.07  | 0.07  | 0     | 0      | 0     | 0      |
| EP-06             | 0.07  | 0.07  | 0     | 0      | 0     | 0      |
| EP-08             | 8.19  | 8.30  | 0.01  | 1.70   | 37.67 | 0.72   |
| EP-09             | 0.07  | 0.07  | 0     | 0      | 0     | 0      |
| EP-10             | 3.85  | 2.35  | 0     | 0      | 0     | 0      |
| EP-11             | 3.85  | 2.35  | 0     | 0      | 0     | 0      |
| EP-12             | 3.85  | 2.35  | 0     | 0      | 0     | 0      |
| EP-13             | 3.85  | 2.35  | 0     | 0      | 0     | 0      |
| EP-14             | 3.85  | 2.35  | 0     | 0      | 0     | 0      |
| EP-15             | 0.02  | 0.01  | 0     | 0      | 0     | 0      |
| Facility Total    |       |       |       |        |       |        |

**FORM 4**  
**FACILITY EMISSIONS SUMMARY**

Facility: Pacific Northwest Renewable Energy - Port of Grays Harbor Wood Pellet Facility

Page 3 of 3

**Instructions: on back.**

| Emission Unit ID# | TSP  | PM-10 | SOx  | NOx  | VOC  | CO   |
|-------------------|------|-------|------|------|------|------|
| GEN-01            | 0.01 | 0.01  | 0.05 | 0.17 | 0.06 | 0.14 |
|                   |      |       |      |      |      |      |
|                   |      |       |      |      |      |      |
|                   |      |       |      |      |      |      |
|                   |      |       |      |      |      |      |
|                   |      |       |      |      |      |      |
|                   |      |       |      |      |      |      |
|                   |      |       |      |      |      |      |
|                   |      |       |      |      |      |      |
|                   |      |       |      |      |      |      |
|                   |      |       |      |      |      |      |
| Facility Total    | 108  | 88    | 18   | 230  | 67   | 185  |

**FORM 5**  
**EMISSIONS OF HAZARDOUS AIR POLLUTANTS**

Facility: PNWRE - Port of Grays Harbor

Emission Unit ID#: Facility-wide

Page 1 of 5

| Pollutant Name        | CAS #    | Maximum<br>Emission Rate<br>(lbs/hr) | Annual<br>Emission Rate<br>(tons/yr) |
|-----------------------|----------|--------------------------------------|--------------------------------------|
| 1,1,1-Trichloroethane | 71-55-6  | 2.69E-01                             | 1.34E-04                             |
| Acetaldehyde          | 75-07-0  | 4.17E-01                             | 1.65E-01                             |
| Acetophenone          | 98-86-2  | 1.64E-04                             | 7.16E-04                             |
| Acrolein              | 107-02-8 | 5.77E-02                             | 5.27E-02                             |
| Benz(a)anthracene     | 56-55-3  | 8.40E-04                             | 4.21E-05                             |
| Benzene               | 71-43-2  | 4.69E-01                             | 3.45E-02                             |
| Benzo(a)pyrene        | 50-32-8  | 9.40E-05                             | 4.76E-06                             |
| Benzo(b)fluoranthene  | 205-99-2 | 4.96E-05                             | 2.57E-06                             |
| Benzo(k)fluoranthene  | 207-08-9 | 7.75E-05                             | 3.97E-06                             |
| Biphenyl              | 92-52-4  | 9.96E-05                             | 4.36E-04                             |
| <b>Facility Total</b> |          |                                      |                                      |

**FORM 5**  
**EMISSIONS OF HAZARDOUS AIR POLLUTANTS**

Facility: PNWRE - Port of Grays Harbor

Emission Unit ID#: Facility-wide

Page 2 of 5

| Pollutant Name               | CAS #    | Maximum<br>Emission Rate<br>(lbs/hr) | Annual<br>Emission Rate<br>(tons/yr) |
|------------------------------|----------|--------------------------------------|--------------------------------------|
| Bis-(2-ethylhexyl phthalate) | 117-81-7 | 8.18E-04                             | 3.58E-03                             |
| Bromomethane                 | 74-83-9  | 7.15E-05                             | 3.13E-04                             |
| Carbon disulfide             | 75-15-0  | 4.60E-05                             | 2.01E-04                             |
| Carbon tetrachloride         | 56-23-5  | 3.07E-05                             | 1.34E-04                             |
| Chloromethane                | 74-87-3  | 2.81E-04                             | 1.23E-03                             |
| Cumene                       | 98-82-8  | 1.76E-04                             | 7.72E-04                             |
| Di-N-butyl phthalate         | 84-74-2  | 5.88E-05                             | 2.57E-04                             |
| Dibenzo(a,h)anthracene       | 53-70-3  | 2.92E-04                             | 1.46E-05                             |
| Ethyl benzene                | 100-41-4 | 9.71E-06                             | 4.25E-05                             |
| Formaldehyde                 | 50-00-0  | 6.55E-01                             | 3.13E-01                             |
| <b>Facility Total</b>        |          |                                      |                                      |

**FORM 5**  
**EMISSIONS OF HAZARDOUS AIR POLLUTANTS**

Facility: PNWRE - Port of Grays Harbor

Emission Unit ID#: Facility-wide

Page 3 of 5

| Pollutant Name          | CAS #     | Maximum<br>Emission Rate<br>(lbs/hr) | Annual<br>Emission Rate<br>(tons/yr) |
|-------------------------|-----------|--------------------------------------|--------------------------------------|
| Hexane                  | 110-54-3  | 2.21E-02                             | 9.69E-02                             |
| Hydroquinone            | 123-31-9  | 1.53E-04                             | 6.71E-04                             |
| Indeno(1,2,3,c,d)pyrene | 193-39-5  | 1.88E-04                             | 9.47E-06                             |
| m,p-Xylene              | 1330-20-7 | 1.44E-01                             | 1.44E-01                             |
| Methanol                | 67-56-1   | 5.41E-02                             | 2.37E-01                             |
| Methyl isobutyl ketone  | 108-10-1  | 6.13E-03                             | 2.69E-02                             |
| n-Hexane                | 110-54-3  | 2.21E-02                             | 9.69E-02                             |
| Naphthalene             | 91-20-3   | 4.63E-02                             | 2.35E-03                             |
| o-Xylene                | 95-47-6   | 3.58E-05                             | 1.57E-04                             |
| Phenol                  | 108-95-2  | 2.82E-02                             | 1.23E-01                             |
| <b>Facility Total</b>   |           |                                      |                                      |

**FORM 5**  
**EMISSIONS OF HAZARDOUS AIR POLLUTANTS**

Facility: PNWRE - Port of Grays Harbor

Emission Unit ID#: Facility-wide

Page 4 of 5

| Pollutant Name        | CAS #     | Maximum<br>Emission Rate<br>(lbs/hr) | Annual<br>Emission Rate<br>(tons/yr) |
|-----------------------|-----------|--------------------------------------|--------------------------------------|
| Propionaldehyde       | 123-38-6  | 8.18E-03                             | 3.58E-02                             |
| Styrene               | 100-42-5  | 3.07E-04                             | 1.34E-03                             |
| Toluene               | 108-88-3  | 2.10E-01                             | 3.39E-02                             |
| Antimony              | 7440-36-0 | 6.51E-05                             | 6.51E-05                             |
| Arsenic               | 7440-38-2 | 1.84E-04                             | 8.05E-04                             |
| Beryllium             | 7440-41-7 | 9.21E-06                             | 4.03E-05                             |
| Cadmium               | 7440-43-9 | 4.73E-05                             | 2.07E-04                             |
| Chromium, hexavalent  | CRVICOMP  | 2.88E-05                             | 1.26E-04                             |
| Chromium, total       | 7440-47-3 | 1.90E-04                             | 8.33E-04                             |
| Cobalt                | 7440-48-4 | 5.46E-05                             | 2.39E-04                             |
| <b>Facility Total</b> |           |                                      |                                      |

**FORM 5**  
**EMISSIONS OF HAZARDOUS AIR POLLUTANTS**

Facility: PNWRE - Port of Grays Harbor

Emission Unit ID#: Facility-wide

Page 5 of 5

| Pollutant Name        | CAS #     | Maximum<br>Emission Rate<br>(lbs/hr) | Annual<br>Emission Rate<br>(tons/yr) |
|-----------------------|-----------|--------------------------------------|--------------------------------------|
| Lead                  | 7439-92-1 | 4.02E-04                             | 1.76E-03                             |
| Manganese             | 7439-96-5 | 1.32E-02                             | 5.78E-02                             |
| Mercury               | 7439-97-6 | 5.80E-04                             | 2.54E-03                             |
| Nickel                | 7440-02-0 | 2.98E-04                             | 1.30E-03                             |
| Phosphorus            | 7723-14-0 | 2.22E-04                             | 9.75E-04                             |
| Selenium              | 7782-49-2 | 2.34E-05                             | 1.02E-04                             |
|                       |           |                                      |                                      |
| 1,3-Butadiene         | 106-99-0  | 1.96E-02                             | 9.78E-04                             |
| Methylene Chloride    | 75-09-2   | 1.61E-03                             | 7.05E-03                             |
|                       |           |                                      |                                      |
| <b>Facility Total</b> |           | 2.18                                 | 1.32                                 |



## FORM 7 PSD APPLICABILITY FORM

This form is an aid to help determine if a proposed project will be required to undergo PSD review. Please submit this form with the cover sheet of the Notice of Construction application to the Local Air Authority. For locations in eastern Washington where the Department of Ecology is the delegated local air authority, submit this form to the appropriate Ecology Regional Office.

It is the responsibility of the applicant to ensure that all preconstruction permits are obtained before commencement of construction.

### COMPANY INFORMATION

Company or owner name: Pacific Northwest Renewable Energy - Port of Grays Harbor

Mailing address: P.O. Box 391  
Sth Egrement, MA 01258

Facility address: 411 Moon Island Road  
Hoquiam, WA 98550

Contact: Brandon Henderson

Telephone: (254) 813-3260

Facility industrial classification and SIC: 2499



## PROCESS INFORMATION AND EMISSIONS CALCULATIONS

This section is intended to furnish a best estimate of annual emissions and sufficient information for agency technical staff to verify the applicant's conclusions in answering the questions in the next section. Please provide:

- (1) A description of the process with a flow diagram indicating points of emissions to the air.
- (2) Design and operating parameters for the process (i.e., hours of operation per year, maximum and normal production rates, fuel and raw material requirements).
- (3) Estimates of the potential emissions for all air pollutants from each emissions point and a description of the method or basis used to make the emission estimates (in enough detail so that one can follow the logic and the calculation steps). Potential emissions are based on the maximum rate from each emission point taking into account air pollution control equipment.

For either a new or modified source, calculate its potential to emit each regulated pollutant based on operation at maximum capacity (such as 8760 hours/year) with emissions control equipment operating.

For a modified source, subtract the actual emissions of the existing source from the potential to emit of the modified source to calculate the emissions increase(decrease). Actual emissions are the average of the last 24 months of operation, if that period is representative of normal operations.

| Regulated Pollutant Under PSD                                      | Potential To Emit Tons/Year | Actual Emissions Tons/Year | Emissions Increase (Decrease) | Significant PSD Rate Tons/Year |
|--------------------------------------------------------------------|-----------------------------|----------------------------|-------------------------------|--------------------------------|
| Carbon Monoxide                                                    | 185                         |                            |                               | 100                            |
| Nitrogen oxides                                                    | 230                         |                            |                               | 40                             |
| Sulfur dioxide                                                     | 18                          |                            |                               | 40                             |
| Particulate matter<br>PM <sub>10</sub>                             | 88 / 71                     |                            |                               | 25<br>15                       |
| Ozone (VOCs)                                                       | 67                          |                            |                               | 40                             |
| Lead (elemental)                                                   | 1.76E-03                    |                            |                               | 0.6                            |
| Fluorides                                                          | --                          |                            |                               | 3                              |
| Sulfuric acid mist                                                 | --                          |                            |                               | 7                              |
| Total reduced sulfur<br>(including H <sub>2</sub> S)               | --                          |                            |                               | 10                             |
| Reduced sulfur compounds<br>(including H <sub>2</sub> S)           | --                          |                            |                               | 10                             |
| Municipal waste combustor organics<br>Dioxins and furans<br>Metals | --                          |                            |                               | 3.5x10 <sup>-6</sup><br>15     |
| Municipal waste combustor acid gasses                              | --                          |                            |                               | 40                             |

### QUESTION 1

Does the proposed source or, in the case of a modification to a source, the existing source fall within one of the following 28 source categories?

1. Fossil fuel-fired steam electric plants of more than 250 million Btu/hr heat input
  2. Coal cleaning plants with thermal dryers
  3. Kraft pulp mills
  4. Portland cement plants
  5. Primary zinc smelters
  6. Iron and steel mill plants
  7. Primary aluminum ore reduction plants
  8. Primary copper smelters
  9. Municipal incinerators capable of charging more than 250 tons of refuse per day
  10. Hydrofluoric acid plants
  11. Sulfuric acid plants
  12. Nitric acid plants
  13. Petroleum refineries
  14. Lime plants
  15. Phosphate rock processing plants
  16. Coke oven batteries
  17. Sulfur recovery plants
  18. Carbon black plants (furnace process)
  19. Primary lead smelters
  20. Fuel conversion plants
  21. Sintering plants
  22. Secondary metal production plants
  23. Chemical process plants
  24. Fossil fuel boilers (or combinations) totaling more than 250 million Btu/hr heat input
  25. Petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels
  26. Taconite ore processing plants
  27. Glass fiber processing plants
  28. Charcoal production plants
- YES \_\_\_\_\_ (Please circle number.) GO TO QUESTION 2.  
 NO <sup>x</sup> \_\_\_\_\_ GO TO QUESTION 3.

### **QUESTION 2**

Will emissions of any one regulated pollutant (including fugitive emissions) from the proposed or existing source exceed 100 tons per year?

YES \_\_\_\_\_ GO TO QUESTION 6.

NO \_\_\_\_\_ PSD IS NOT REQUIRED. DO NOT ANSWER ANY MORE QUESTIONS. SUBMIT THIS FORM WITH THE NOTICE OF CONSTRUCTION APPLICATION.

### **QUESTION 3**

Does the proposed source or, in the case of a modification to a source, the existing source fall within one of the following source categories?

1. Municipal Incinerators ( ☐ 50 tons/day )
2. Asphalt concrete plants
3. Storage vessels for petroleum liquids, ☐ 40,000 gallons, construction after 06/11/73 and prior to 05/19/78.
4. Storage vessels for petroleum liquids, ☐ 40,000 gallons, construction after 05/18/78
5. Sewage treatment plants with sludge incinerators
6. Phosphate fertilizer industry: Plants manufacturing wet-process phosphoric acid, superphosphoric acid, diammonium phosphate, triple superphosphate, and granular triple superphosphate storage facilities.
7. Glass melting furnace ☐ 4,555 kilograms glass/day, (except all electric melters)
8. Grain elevators
9. Stationary gas turbines ☐ 10.7 gigajoules/hour heat input
10. Lead acid battery manufacturing plants
11. Automobile and light-duty truck assembly plant surface coating operations

YES \_\_\_\_\_ (Please Circle Number) GO TO QUESTION 4

NO <sup>x</sup> \_\_\_\_\_ GO TO QUESTION 5

### **QUESTION 4**

Will the emissions of any one regulated pollutant (including fugitive emissions) from the proposed or existing source exceed 250 tons/year?

YES \_\_\_\_\_ GO TO QUESTION 6  
NO \_\_\_\_\_ PSD IS NOT REQUIRED. DO NOT ANSWER ANY MORE QUESTIONS. SUBMIT THIS FORM WITH THE NOTICE OF CONSTRUCTION APPLICATION.

**QUESTION 5**

Will emissions of any one pollutant (not including fugitive emissions) from the proposed or existing source exceed 250 tons per year?

YES \_\_\_\_\_ GO TO QUESTION 6.

NO <sup>x</sup> \_\_\_\_\_ PSD IS NOT REQUIRED. DO NOT ANSWER ANY MORE QUESTIONS. SUBMIT THIS FORM WITH THE NOTICE OF CONSTRUCTION APPLICATION.

**QUESTION 6**

Is the project located within 10 kilometers (6.2 miles) of the boundary of a Class I area? Class I areas in Washington State are Mount Rainier National Park, North Cascade National Park, Olympic National Park, Alpine Lakes Wilderness Area, Glacier Peak Wilderness Area, Goat Rocks Wilderness Area, Mount Adams Wilderness Area, Pasayten Wilderness Area, and the Spokane Indian Reservation.

YES \_\_\_\_\_ PSD REVIEW IS REQUIRED IF THE IMPACT OF ANY REGULATED POLLUTANT IS EQUAL TO OR GREATER THAN 1  $\mu\text{g}/\text{m}^3$ , (24-hour average).

NO \_\_\_\_\_ CONTINUE

**QUESTION 7**

Is the proposed project a

1. \_\_\_\_\_ new source? GO TO QUESTION 8.

2. \_\_\_\_\_ modification, expansion, or addition to an existing source? GO TO QUESTION 9.

**QUESTION 8**

For which regulated pollutants does the potential to emit of the new source exceed the PSD significant rate?

---

---

PSD REVIEW IS REQUIRED FOR THESE POLLUTANTS. YOU MUST MEET WITH THE DEPARTMENT OF ECOLOGY TO DISCUSS THE PSD APPLICATION PROCEDURE.

**QUESTION 9**

For which regulated pollutants do the emissions increase from the modified source exceed the PSD significant rate?

---

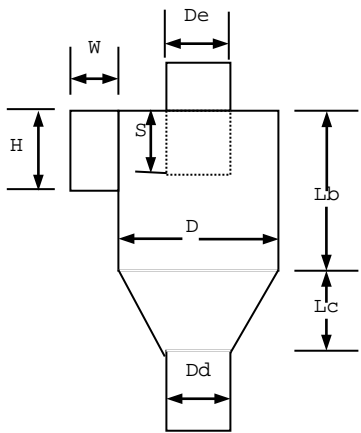
---

PSD REVIEW IS REQUIRED FOR THESE POLLUTANTS. YOU MUST MEET WITH THE DEPARTMENT OF ECOLOGY TO DISCUSS THE PSD APPLICATION PROCEDURE.

# OLYMPIC REGION CLEAN AIR AGENCY

2940 Limited Lane NW - Olympia, Washington 98502 - 360-539-7610 – Fax 360-491-6308

## NOC FORM 13 CYCLONES

|                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                            |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| <b>GENERAL INFORMATION</b>                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                            |
| Facility Name:<br>Pacific Northwest Renewable Energy<br>Port of Grays Harbor Wood Pellet Facility                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                | Contact Person: Brandon Henderson<br>Phone Number: (254) 813-3260<br>Email: bhenderson@pnwrenewable.com                    |
| <b>Facility</b> Operating Schedule:<br>24 hrs/day, 7 days/wk, 52 wks/yr<br>Check days when operating:<br>M T W Th F Sat Sun                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Cyclone</b> Operating Schedule:<br>24 hrs/day, 7 days/wk, 52 wks/yr<br>Check days when operating:<br>M T W Th F Sat Sun |
| X new unit<br>___ modification<br>___ # identical units                                                                                                                                                                                                        | Manufacturer:<br>TBD                                                                                                                                                                                                                                                                                                                                                                                                                           | Model & Serial #s:<br>TBD                                                                                                  |
| <b>TECHNICAL SPECIFICATIONS</b>                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                            |
| Air Flow:<br>design acfm<br>37664<br>operating acfm                                                                                                                                                                                                            | System Parameters:<br>pressure drop (inches water)<br>fan power (hp)<br>temperature (°F or ambient) ambient                                                                                                                                                                                                                                                                                                                                    |                                                                                                                            |
| Cyclone Design Parameters                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                            |
| S (in.)<br>H (in.)<br>De (in.)<br>Dd (in.)<br>W (in.)<br>D (in.)<br>Lb (in.)<br>Lc (in.)                                                                                                                                                                       | <div style="display: flex; align-items: center;">  <div style="margin-left: 20px;">           Describe location of cyclone including height and related stack (use additional pages if necessary):<br/><br/> <b>Chips Cleaning Line Cyclone EP-01</b><br/>           Stack diameter = 47 inches<br/>           Stack height = 50 feet         </div> </div> |                                                                                                                            |
| Describe operation of cyclone including use of safety bypass stacks (use additional pages if necessary):<br>A scalper roll sorts forest residual chips from impurities/overs and cyclone captures airborne particulate, cyclone product capture sent to dryer. |                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                            |
| <b>PARTICULATE EMISSIONS DATA</b>                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                            |
| Describe Particulate Emissions:<br>wood and dirt residue                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                            |
| <b>OTHER INFORMATION</b>                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                            |
| The following information is needed to complete the application:<br>1. <u>Manufacturer brochure or technical fact sheet for cyclone.</u>                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                            |

Note: See back side of form for ORCAA approved equipment and operations.

# OLYMPIC REGION CLEAN AIR AGENCY

2940 Limited Lane NW - Olympia, Washington 98502 - 360-539-7610 – Fax 360-491-6308

## NOC FORM 13 CYCLONES

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                             |                                                                                                                            |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| <b>GENERAL INFORMATION</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                             |                                                                                                                            |
| Facility Name:<br><b>Pacific Northwest Renewable Energy<br/>Port of Grays Harbor Wood Pellet Facility</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                             | Contact Person: Brandon Henderson<br>Phone Number: (254) 813-3260<br>Email: bhenderson@pnwrenewable.com                    |
| <b>Facility</b> Operating Schedule:<br>24 hrs/day, 7 days/wk, 52 wks/yr<br>Check days when operating:<br>M T W Th F Sat Sun                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                             | <b>Cyclone</b> Operating Schedule:<br>24 hrs/day, 7 days/wk, 52 wks/yr<br>Check days when operating:<br>M T W Th F Sat Sun |
| X new unit<br>___ modification<br>___ # identical units                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Manufacturer:<br><b>TBD</b>                                                                                 | Model & Serial #s:<br><b>TBD</b>                                                                                           |
| <b>TECHNICAL SPECIFICATIONS</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                             |                                                                                                                            |
| Air Flow:<br>design acfm<br>10593<br>operating acfm                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | System Parameters:<br>pressure drop (inches water)<br>fan power (hp)<br>temperature (°F or ambient) ambient |                                                                                                                            |
| <b>Cyclone Design Parameters</b><br><br><div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>S (in.)</p> <p>H (in.)</p> <p>De (in.)</p> <p>Dd (in.)</p> <p>W (in.)</p> <p>D (in.)</p> <p>Lb (in.)</p> <p>Lc (in.)</p> </div> <div style="width: 45%; text-align: center;"> </div> <div style="width: 45%;"> <p>Describe location of cyclone including height and related stack (use additional pages if necessary):</p> <p><b>Wet Hammermill Cyclones EP-02 and EP-03</b><br/>           Stack diameter = 24 inches<br/>           Stack height = 50 feet</p> </div> </div> |                                                                                                             |                                                                                                                            |
| Describe operation of cyclone including use of safety bypass stacks (use additional pages if necessary):<br><b>2 wet hammermills reduce wet wood material size for optimum drying. One cyclone per wet hammermill recovers airborne product and sends to the dryer.</b>                                                                                                                                                                                                                                                                                                                                          |                                                                                                             |                                                                                                                            |
| <b>PARTICULATE EMISSIONS DATA</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                             |                                                                                                                            |
| Describe Particulate Emissions:<br><b>wood dust</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                             |                                                                                                                            |
| <b>OTHER INFORMATION</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                             |                                                                                                                            |
| The following information is needed to complete the application:<br>1. <u>Manufacturer brochure or technical fact sheet for cyclone.</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                             |                                                                                                                            |

Note: See back side of form for ORCAA approved equipment and operations.

# OLYMPIC REGION CLEAN AIR AGENCY

2940 Limited Lane NW - Olympia, Washington 98502 - 360-539-7610 – Fax 360-491-6308

## FORM 35 Oxidizer

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                 |                                                                                                                                                       |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>General Information</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                 |                                                                                                                                                       |
| Facility Name:<br>Pacific Northwest Renewable Energy - RTO EP-04                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Contact Person:   Brandon Henderson<br>Phone Number:   (254) 813-3260<br>Email:            bhenderson@pnwrenewable.com                          |                                                                                                                                                       |
| Facility Operating Schedule:<br>24 hrs/day, 7 days/wk, 52 wks/yr<br><br>Circle days when operating:<br>(M) (T) (W) (Th) (F) (Sat) (Sun)                                                                                                                                                                                                                                                                                                                                                                                                                                   | Oxidizer Operating Schedule:<br>24 hrs/day, 7 days/wk, 52 wks/yr<br><br>Circle days when operating:<br>(M) (T) (W) (Th) (F) (Sat) (Sun)         |                                                                                                                                                       |
| <input checked="" type="checkbox"/> new unit installation<br><input type="checkbox"/> modification                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Manufacturer:           TBD                                                                                                                     | Model & Serial #s:    TBD                                                                                                                             |
| <b>Technical Specifications</b> (attach additional pages if needed)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                 |                                                                                                                                                       |
| Oxidizer Type:<br><br><input type="checkbox"/> catalytic oxidizer<br><input checked="" type="checkbox"/> regenerative thermal oxidizer<br><input type="checkbox"/> recuperative thermal oxidizer<br><input type="checkbox"/> thermal (direct fired) oxidizer                                                                                                                                                                                                                                                                                                              | Air Flow:<br><br>blower acfm   124031<br>blower hp _____<br>combustion retention time (sec.) _____<br>pressure drop (in. H <sub>2</sub> O)   25 | Burner:<br><br>type of fuel   Natural Gas<br>maximum fuel usage   8 MMBtu/hr<br>gas inlet temperature (°F)   176<br>set point temperature (°F)   1500 |
| For catalytic oxidizers:<br>1. What is the catalyst material?<br>2. What is the expected catalyst lifetime?<br>3. Describe the catalyst cleaning and replacement procedures and frequency.                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                 |                                                                                                                                                       |
| For regenerative thermal oxidizers:<br>1. What is the media type?   Ceramic<br>2. How many chambers are there and what are the chamber dimensions?   4 chambers. 11 feet wide by 23 feet long by 8 feet tall                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                 |                                                                                                                                                       |
| For recuperative thermal oxidizers:<br>1. Describe the type of heat exchanger?<br>2. What are the dimensions of the combustion chamber?                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                 |                                                                                                                                                       |
| For direct fired thermal oxidizers:<br>1. What are the dimensions of the combustion chamber?                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                 |                                                                                                                                                       |
| Describe monitoring of oxidizer, including temperature, airflow, fuel consumption, and pressure drop. Include a description of the data analyzer and how records will be kept:   TBD                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                 |                                                                                                                                                       |
| <b>Emissions</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                 |                                                                                                                                                       |
| VOC control efficiency (%)   > 95%<br>Maximum VOC emissions (ppm or lbs/hr)   6.575 lb/hr                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Maximum NOx emissions (ppm or lbs/hr)   52 lb/hr<br>Maximum CO emissions (ppm or lbs/hr)   42 lb/hr                                             |                                                                                                                                                       |
| <b>Exhaust Parameters</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                 |                                                                                                                                                       |
| Stack height (feet)   90<br>Stack internal diameter (feet)   87 inches                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Exhaust airflow (scfm)   103229<br>Exhaust temperature (°F)   131                                                                               |                                                                                                                                                       |
| <b>Other Information</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                 |                                                                                                                                                       |
| The following information is needed to complete the application:<br>1. Brochure or technical fact sheet from manufacturer or consultant.   See Appendix D<br>2. Scaled technical drawings of the oxidizer, including location of thermocouple and other monitoring equipment.   TBD<br>3. Plan of facility showing locations of oxidizer, stack, and nearby buildings (including maximum heights).   See Appendix B<br>4. Describe any concentrators or particulate control devices associated with the oxidizer.   2 cyclone precleaners, wet electrostatic precipitator |                                                                                                                                                 |                                                                                                                                                       |

# OLYMPIC REGION CLEAN AIR AGENCY

2940 Limited Lane NW - Olympia, Washington 98502 - 360-539-7610 – Fax 360-491-6308

## FORM 12 BAGHOUSE

|                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>GENERAL INFORMATION</b>                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                       |
| Facility Name: <b>Pacific Northwest Renewable Energy Dry Hammer Mill Cyclofilters (x4)</b>                                                                                                                                                                                                                                                                            |                                                                                                                                                                                | Contact Person: Brandon Henderson<br>Phone Number: (254) 813-3260<br>Email: bhenderson@pnwrenewable.com                                                                                                                                                                                                                                                               |
| Facility Operating Schedule:<br><u>24</u> hrs/day, <u>7</u> days/wk, <u>52</u> wks/yr<br><br>Check days when operating:<br>M <input checked="" type="checkbox"/> T <input checked="" type="checkbox"/> W <input checked="" type="checkbox"/> Th <input checked="" type="checkbox"/> F <input checked="" type="checkbox"/> Sat <input checked="" type="checkbox"/> Sun |                                                                                                                                                                                | Baghouse Operating Schedule:<br><u>24</u> hrs/day, <u>7</u> days/wk, <u>52</u> wks/yr<br><br>Check days when operating:<br>M <input checked="" type="checkbox"/> T <input checked="" type="checkbox"/> W <input checked="" type="checkbox"/> Th <input checked="" type="checkbox"/> F <input checked="" type="checkbox"/> Sat <input checked="" type="checkbox"/> Sun |
| <input checked="" type="checkbox"/> new unit installation<br><input type="checkbox"/> modification                                                                                                                                                                                                                                                                    | Manufacturer:<br><b>TBD</b>                                                                                                                                                    | Model & Serial #s:<br><b>TBD</b>                                                                                                                                                                                                                                                                                                                                      |
| <b>TECHNICAL SPECIFICATIONS</b>                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                       |
| Air Flow:<br><br>design acfm    29500<br>operating acfm<br>temperature (F°)                                                                                                                                                                                                                                                                                           | System Parameters:<br><br>pressure drop (inches water)<br>water vapor content (lbs water/lb dry air)<br>fan power (hp)                                                         |                                                                                                                                                                                                                                                                                                                                                                       |
| Describe filter material:                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                       |
| Describe bag cleaning mechanism and cycle:                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                       |
| Describe operation of baghouse including use of safety bypasses, monitoring and maintenance schedules and any other pertinent information relating to particulate emissions (use additional pages if necessary):                                                                                                                                                      |                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                       |
| <b>PARTICULATE EMISSIONS DATA</b>                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                       |
| Particulate Emissions:<br>inlet (gr/scf) _____<br>outlet (gr/scf) <u>0.002</u>                                                                                                                                                                                                                                                                                        | Particulate Control Efficiency:<br><br>filtering velocity (acfm/ft <sup>2</sup> cloth)<br>particulate control efficiency (%):                                                  |                                                                                                                                                                                                                                                                                                                                                                       |
| Describe Particulate Emissions: <b>Wood residue from pellet cooling and handling</b>                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                       |
| Micron Range:<br><br><div style="text-align: center;">0 - 5</div> <div style="text-align: center;">5 - 10</div> <div style="text-align: center;">greater than 10</div>                                                                                                                                                                                                | Inlet Loading (% of total)<br><br><div style="text-align: center;">_____ %</div> <div style="text-align: center;">_____ %</div> <div style="text-align: center;">_____ %</div> | Outlet Loading (% of total)<br><br><div style="text-align: center;">_____ %</div> <div style="text-align: center;">_____ %</div> <div style="text-align: center;">_____ %</div>                                                                                                                                                                                       |
| <b>OTHER INFORMATION</b>                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                       |
| The following information is needed to complete the application:<br>1. Manufacturer brochure or technical fact sheet for filter material.<br>2. Scaled technical drawings of the baghouse including top, side and interior views.<br>3. Manufacturer brochure or technical fact sheet for baghouse.                                                                   |                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                       |

Note: See back side of form for ORCAA approved equipment and operations.

**REQUIREMENTS FOR NEW BAGHOUSES**  
**ORCAA 1/4/96**

1. **BACT for Particulate Control:** ORCAA may require demonstration of compliance based on measured stack grain loading in accordance to the procedures outlined in 40CFR Part 60 and in accordance with ORCAA's approved particulate source test procedures.

1.1 Low Temperature Process Streams - Grain Elevators, Barley Processing, Forest Products Dust, Large Cabinet Shops:

Particulate Limit: 0.01 gr/dscf  
Opacity Limit: 5% for entire process stream.

These limits are appropriate for low temperature dust control when NOMEX bags are feasible.

1.2 High Temperature Process Streams - Ceramics, Metal Dust:

Particulate Limit: 0.01 gr/dscf  
Opacity Limit: 5% for entire process stream.

1.3 Combustion Sources - Boilers, Asphalt Plants:

Particulate Limit: 0.02 gr/dscf (back half included)

Opacity Limit: 5% for entire process stream.

2. **Stack:** Emissions shall exit through a vertical stack at least 2 meters above the highest point of the baghouse. Permanent sampling ports and platforms shall be installed on the stack prior to commencement of operation. The sampling ports shall meet the requirements of 40, CFR Part 60, Appendix A, Method 1.

3. **Opacity Monitor (wood fired boilers):** Owners and operators of baghouses installed on wood fired boilers shall install, calibrate, maintain, and operate a continuous emissions monitoring system (CEMS) for continuously monitoring the boiler stack gas opacity prior to exiting to the atmosphere.

3.1 The opacity CEMS shall be certified and installed in accordance 40CFR Part 60, Performance Specification 1 (appendix B).

3.2 The opacity CEMS shall be equipped with a strip chart recorder or data acquisition system (DAS) capable of computing and recording stack gas opacity in three consecutive minute averages. The data acquisition system or strip chart recorder shall record and display opacity values to 0.5% opacity.

3.3 Prior to installation of the CEMS, the owner or operator shall provide ORCAA a written manufacturers certificate of conformance with Performance Specification 1.

3.4 An opacity CEMS quality assurance plan conforming with 40 CFR Part 60 Appendix F and the EPA publication "Recommended Quality Assurance Procedures for Opacity Continuous Emissions Monitoring Systems" (EPA 340/1-86-010) shall be developed and submitted to ORCAA for approval no later than 180 days after commencement of operation.

3.5 The opacity CEMS shall be operational and tested for compliance with 40 CFR Part 60, Appendix B Performance Specification 1 no later than 90 days after initial startup.

4. **Other:** Other requirements include; 1) monitoring of pressure drop across baghouse, 2) bag monitoring and maintenance schedule, 3) full set of replacement bags on-site, 4) emission inventory reporting, and 5) excess emissions reporting.



# OLYMPIC REGION CLEAN AIR AGENCY

2940 Limited Lane NW - Olympia, Washington 98502 - 360-539-7610 – Fax 360-491-6308

## FORM 12 BAGHOUSE

| GENERAL INFORMATION                                                                                                                                                                                                                                                                                 |                                                                                                                               |                                                                                                                                                      |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|
| Facility Name: <b>Pacific Northwest Renewable Energy</b>                                                                                                                                                                                                                                            |                                                                                                                               | Contact Person: Brandon Henderson<br>Phone Number: (254) 813-3260<br>Email: bhenderson@pnwrenewable.com                                              |
| Facility Operating Schedule:<br><b>24</b> hrs/day, <b>7</b> days/wk, <b>52</b> wks/yr<br><br>Check days when operating:<br><b>M T W Th F Sat Sun</b>                                                                                                                                                |                                                                                                                               | Baghouse Operating Schedule:<br><b>24</b> hrs/day, <b>7</b> days/wk, <b>52</b> wks/yr<br><br>Check days when operating:<br><b>M T W Th F Sat Sun</b> |
| <input checked="" type="checkbox"/> new unit installation<br><input type="checkbox"/> modification                                                                                                                                                                                                  | Manufacturer:<br><b>TBD</b>                                                                                                   | Model & Serial #s:<br><b>TBD</b>                                                                                                                     |
| TECHNICAL SPECIFICATIONS                                                                                                                                                                                                                                                                            |                                                                                                                               |                                                                                                                                                      |
| Air Flow:<br><br>design acfm<br>operating acfm<br>temperature (F°)                                                                                                                                                                                                                                  | System Parameters:<br><br>pressure drop (inches water)<br>water vapor content (lbs water/lb dry air)<br>fan power (hp)        |                                                                                                                                                      |
| Describe filter material:                                                                                                                                                                                                                                                                           |                                                                                                                               |                                                                                                                                                      |
| Describe bag cleaning mechanism and cycle:                                                                                                                                                                                                                                                          |                                                                                                                               |                                                                                                                                                      |
| Describe operation of baghouse including use of safety bypasses, monitoring and maintenance schedules and any other pertinent information relating to particulate emissions (use additional pages if necessary):                                                                                    |                                                                                                                               |                                                                                                                                                      |
| PARTICULATE EMISSIONS DATA                                                                                                                                                                                                                                                                          |                                                                                                                               |                                                                                                                                                      |
| Particulate Emissions:<br>inlet (gr/scf) _____<br>outlet (gr/scf) <b>0.002</b>                                                                                                                                                                                                                      | Particulate Control Efficiency:<br><br>filtering velocity (acfm/ft <sup>2</sup> cloth)<br>particulate control efficiency (%): |                                                                                                                                                      |
| Describe Particulate Emissions: <b>Wood residue from pellet cooling and handling</b>                                                                                                                                                                                                                |                                                                                                                               |                                                                                                                                                      |
| Micron Range:                                                                                                                                                                                                                                                                                       | Inlet Loading (% of total)                                                                                                    | Outlet Loading (% of total)                                                                                                                          |
| 0 - 5                                                                                                                                                                                                                                                                                               | _____ %                                                                                                                       | _____ %                                                                                                                                              |
| 5 - 10                                                                                                                                                                                                                                                                                              | _____ %                                                                                                                       | _____ %                                                                                                                                              |
| greater than 10                                                                                                                                                                                                                                                                                     | _____ %                                                                                                                       | _____ %                                                                                                                                              |
| OTHER INFORMATION                                                                                                                                                                                                                                                                                   |                                                                                                                               |                                                                                                                                                      |
| The following information is needed to complete the application:<br>1. Manufacturer brochure or technical fact sheet for filter material.<br>2. Scaled technical drawings of the baghouse including top, side and interior views.<br>3. Manufacturer brochure or technical fact sheet for baghouse. |                                                                                                                               |                                                                                                                                                      |

Note: See back side of form for ORCAA approved equipment and operations.

**REQUIREMENTS FOR NEW BAGHOUSES**  
**ORCAA 1/4/96**

1. **BACT for Particulate Control:** ORCAA may require demonstration of compliance based on measured stack grain loading in accordance to the procedures outlined in 40CFR Part 60 and in accordance with ORCAA's approved particulate source test procedures.

1.1 Low Temperature Process Streams - Grain Elevators, Barley Processing, Forest Products Dust, Large Cabinet Shops:

Particulate Limit: 0.01 gr/dscf  
Opacity Limit: 5% for entire process stream.

These limits are appropriate for low temperature dust control when NOMEX bags are feasible.

1.2 High Temperature Process Streams - Ceramics, Metal Dust:

Particulate Limit: 0.01 gr/dscf  
Opacity Limit: 5% for entire process stream.

1.3 Combustion Sources - Boilers, Asphalt Plants:

Particulate Limit: 0.02 gr/dscf (back half included)  
  
Opacity Limit: 5% for entire process stream.

2. **Stack:** Emissions shall exit through a vertical stack at least 2 meters above the highest point of the baghouse. Permanent sampling ports and platforms shall be installed on the stack prior to commencement of operation. The sampling ports shall meet the requirements of 40, CFR Part 60, Appendix A, Method 1.

3. **Opacity Monitor (wood fired boilers):** Owners and operators of baghouses installed on wood fired boilers shall install, calibrate, maintain, and operate a continuous emissions monitoring system (CEMS) for continuously monitoring the boiler stack gas opacity prior to exiting to the atmosphere.

3.1 The opacity CEMS shall be certified and installed in accordance 40CFR Part 60, Performance Specification 1 (appendix B).

3.2 The opacity CEMS shall be equipped with a strip chart recorder or data acquisition system (DAS) capable of computing and recording stack gas opacity in three consecutive minute averages. The data acquisition system or strip chart recorder shall record and display opacity values to 0.5% opacity.

3.3 Prior to installation of the CEMS, the owner or operator shall provide ORCAA a written manufacturers certificate of conformance with Performance Specification 1.

3.4 An opacity CEMS quality assurance plan conforming with 40 CFR Part 60 Appendix F and the EPA publication "Recommended Quality Assurance Procedures for Opacity Continuous Emissions Monitoring Systems" (EPA 340/1-86-010) shall be developed and submitted to ORCAA for approval no later than 180 days after commencement of operation.

3.5 The opacity CEMS shall be operational and tested for compliance with 40 CFR Part 60, Appendix B Performance Specification 1 no later than 90 days after initial startup.

4. **Other:** Other requirements include; 1) monitoring of pressure drop across baghouse, 2) bag monitoring and maintenance schedule, 3) full set of replacement bags on-site, 4) emission inventory reporting, and 5) excess emissions reporting.

# OLYMPIC REGION CLEAN AIR AGENCY

2940 Limited Lane NW - Olympia, Washington 98502 - 360-539-7610 – Fax 360-491-6308

## FORM 35 Oxidizer

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                         |                                                                                                                                                                         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>General Information</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                         |                                                                                                                                                                         |
| Facility Name:<br>Pacific Northwest Renewable Energy - RCO EP-08                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Contact Person: Brandon Henderson<br>Phone Number: (254) 813-3260<br>Email: bhenderson@pnwrenewable.com                                                 |                                                                                                                                                                         |
| Facility Operating Schedule:<br>24 hrs/day, 7 days/wk, 52 wks/yr<br><br>Circle days when operating:<br>(M) (T) (W) (Th) (F) (Sat) (Sun)                                                                                                                                                                                                                                                                                                                                                                                                                  | Oxidizer Operating Schedule:<br>24 hrs/day, 7 days/wk, 52 wks/yr<br><br>Circle days when operating:<br>(M) (T) (W) (Th) (F) (Sat) (Sun)                 |                                                                                                                                                                         |
| <input checked="" type="checkbox"/> new unit installation<br><input type="checkbox"/> modification                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Manufacturer: TBD                                                                                                                                       | Model & Serial #s: TBD                                                                                                                                                  |
| <b>Technical Specifications</b> (attach additional pages if needed)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                         |                                                                                                                                                                         |
| Oxidizer Type:<br><br><input checked="" type="checkbox"/> catalytic oxidizer<br><input type="checkbox"/> regenerative thermal oxidizer<br><input type="checkbox"/> recuperative thermal oxidizer<br><input type="checkbox"/> thermal (direct fired) oxidizer                                                                                                                                                                                                                                                                                             | Air Flow:<br><br>blower acfm _____ 137000<br>blower hp _____<br>combustion retention time (sec.) _____<br>pressure drop (in. H <sub>2</sub> O) _____ 25 | Burner:<br><br>type of fuel _____ Natural Gas<br>maximum fuel usage _____ 4.5 MMBtu/hr<br>gas inlet temperature (°F) _____ 176<br>set point temperature (°F) _____ 1500 |
| For catalytic oxidizers:<br>1. What is the catalyst material?<br>2. What is the expected catalyst lifetime?<br>3. Describe the catalyst cleaning and replacement procedures and frequency.                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                         |                                                                                                                                                                         |
| For regenerative thermal oxidizers:<br>1. What is the media type?<br>2. How many chambers are there and what are the chamber dimensions?                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                         |                                                                                                                                                                         |
| For recuperative thermal oxidizers:<br>1. Describe the type of heat exchanger?<br>2. What are the dimensions of the combustion chamber?                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                         |                                                                                                                                                                         |
| For direct fired thermal oxidizers:<br>1. What are the dimensions of the combustion chamber?                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                         |                                                                                                                                                                         |
| Describe monitoring of oxidizer, including temperature, airflow, fuel consumption, and pressure drop. Include a description of the data analyzer and how records will be kept: TBD                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                         |                                                                                                                                                                         |
| <b>Emissions</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                         |                                                                                                                                                                         |
| VOC control efficiency (%) _____ > 95%<br>Maximum VOC emissions (ppm or lbs/hr) _____ 8.6 lb/hr                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Maximum NOx emissions (ppm or lbs/hr) _____ 0.04 lb/hr<br>Maximum CO emissions (ppm or lbs/hr) _____ 0.02 lb/hr                                         |                                                                                                                                                                         |
| <b>Exhaust Parameters</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                         |                                                                                                                                                                         |
| Stack height (feet) _____ 90<br>Stack internal diameter (feet) _____ 83 inches                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Exhaust airflow (scfm) _____ 99795<br>Exhaust temperature (°F) _____ 214                                                                                |                                                                                                                                                                         |
| <b>Other Information</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                         |                                                                                                                                                                         |
| The following information is needed to complete the application:<br>1. Brochure or technical fact sheet from manufacturer or consultant. See Appendix D<br>2. Scaled technical drawings of the oxidizer, including location of thermocouple and other monitoring equipment. TBD<br>3. Plan of facility showing locations of oxidizer, stack, and nearby buildings (including maximum heights). See Appendix B<br>4. Describe any concentrators or particulate control devices associated with the oxidizer. cyclones and combined cyclone/fabric filters |                                                                                                                                                         |                                                                                                                                                                         |

# SEPA ENVIRONMENTAL CHECKLIST

## A. Background

**1. Name of proposed project, if applicable:**

Port of Grays Harbor Plant Project

**2. Name of applicant:**

Pacific Northwest Renewable Energy (PNWRE)

**3. Address and phone number of applicant and contact person:**

Applicant:

Mark Boivin, CEO

PO Box 391 South Egremont, MA 01258

413.244.7360

mboivin@pnwrenewable.com

Contact:

Sharese Graham

1201 Third Ave, Suite 550, Seattle, WA 98101

206.739.5454

sharese.graham@scjalliance.com

**4. Date checklist prepared:**

June 14, 2023

**5. Agency requesting checklist:**

City of Hoquiam

**6. Proposed timing or schedule (including phasing, if applicable):**

Construction is anticipated to begin in January 2024.

**7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.**

There are no plans for additional construction after commencement of normal operations identified in the project description.

**8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.**

- Air Quality Analysis
- Contaminated Media Management Plan
- Federal Aviation Administration (FAA) Obstruction Review
- Phase I Environmental Site Assessment
- Wetlands and Streams Delineation (prepared for a previous proposal at the same site)
- Cultural Resources Assessment (prepared for a previous proposal at the same site)

**9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.**

There are no known pending applications for other projects or proposals directly affecting the property for this proposed project.

**10. List any government approvals or permits that will be needed for your proposal, if known.**

State Approvals/Permits

- ORCAA – Air Quality Permit
- Department of Ecology – National Pollutant Discharge Elimination System (NPDES) Construction Stormwater Permit and Industrial Stormwater Permit
- FAA – Clearance Letter

Local Approvals/Permits

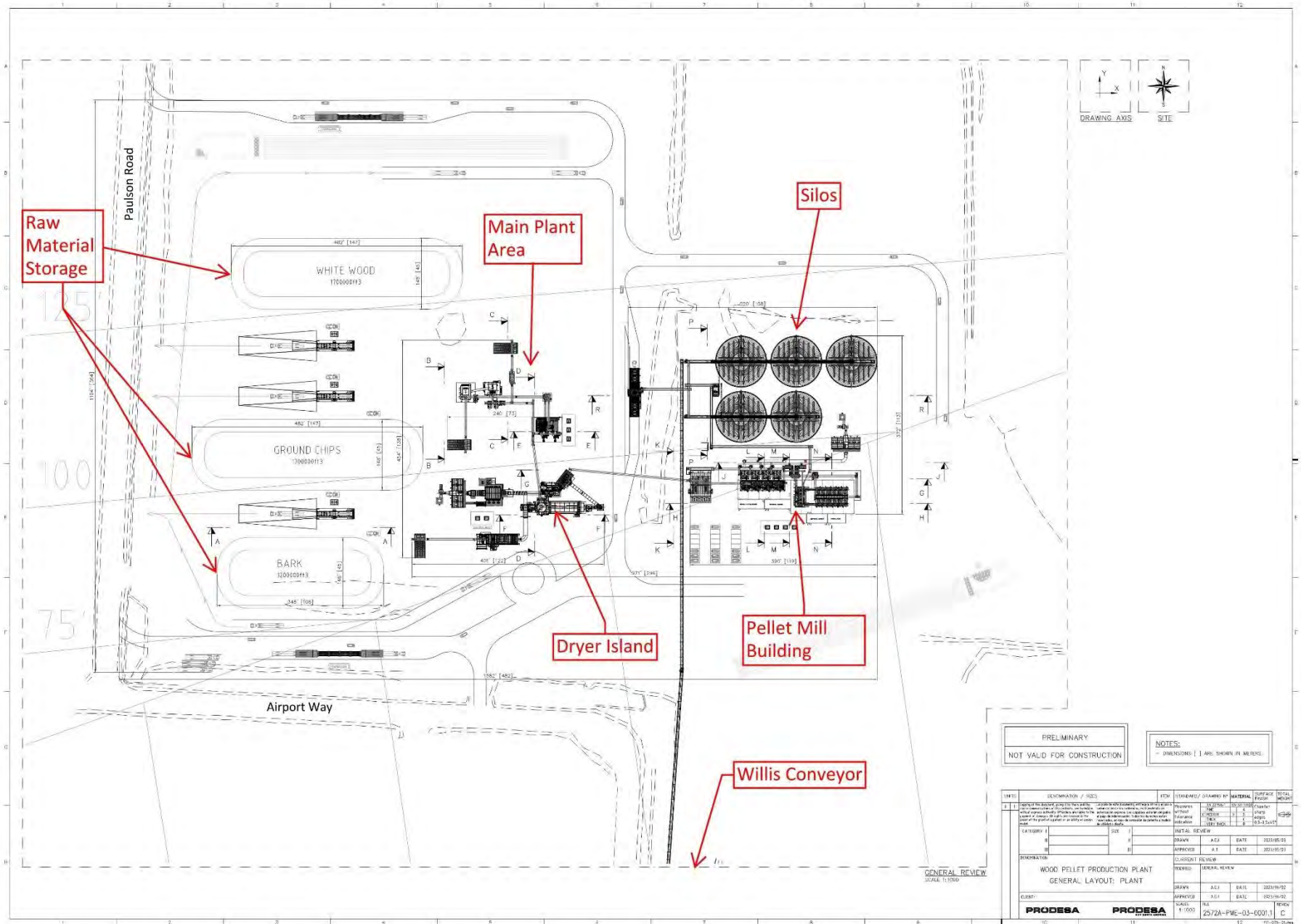
- City of Hoquiam – Zoning Conditional Use Permit, Critical Areas Review, Floodplain Permit, Construction Permits, Binding Site Plan
- Port of Grays Harbor – Approval of Operation Agreement and Lease Agreement

**11. Give a brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)**

PNWRE is proposing to construct and operate a biomass facility (pellet plant) in Hoquiam, Grays Harbor County. Wood pellets will be manufactured at the project site and exported, via vessel, to international markets, including Asia and Europe. The adjacent chip mill site is expected to be one of the sources of raw material, thus reducing truck trips to and from the site.

The processing of wood chips at the proposed facility includes the use of three truck tippers, a chips cleaning line, two wet hammermills controlled by cyclones, one hog fuel furnace and dryer controlled by a wet electrostatic precipitator (WESP) and a regenerative thermal oxidizer (RTO), four dry hammermills each controlled by a cyclone, 12 pellet production and cooling lines controlled by two cyclones, and a regenerative catalytic oxidizer (RCO) controlling the combined dry hammermills and pellet cooling lines, five wood pellet storage silos, and a ship loadout area. The wet raw materials for pellet production and hog fuel for the furnace will be delivered to the facility via truck. The facility could process up to 440,800 tons per year (TPY) of dried wood pellets. The Project Site Plan is shown in Figure 1.

Figure 1 Project Site Plan





The steel silos (which are similar to grain silos) and conveyor will connect to the existing conveyor that leads from the Willis Enterprises chip plant to Terminal 3. The conveyor was recently renovated by Willis Enterprises. The storage silos will have a total capacity of up to 50,000 metric tons and shall aggregate pellets until enough volume is accumulated for bulk shipments of 20,000-45,000 metric tons per ship.

**12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of areas, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.**

The project address is 411 Moon Island Road, TLN 056401000400, at the corner of Paulson Road and Airport Way near an existing wood chip plant (Willis Enterprises), and the Port of Grays Harbor Terminal 3 in the City of Hoquiam (Figure 2).

**Figure 2 Project Location Map**



## B. Environmental Elements

### 1. Earth

#### a. General description of the site:

**Circle or highlight one:** Flat, rolling, hilly, steep slopes, mountainous, other:

The project site is generally bare, undeveloped ground.

The lowlands were formed by historic tidelands and riverine floodplains from the mainstem Hoquiam River and its major lower tributaries.

#### b. What is the steepest slope on the site (approximate percent slope)?

The steepest slope is less than 2%.

#### c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them, and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

The Natural Resource Conservation Service indicates the following soils in or near the project site:

- Fluvaquents, tidal, 24.0%
- Udorthents, level, 76.0%

The Project site was initially filled over 50 years ago. The initial fill included placement of sandy material dredged from Grays Harbor, while subsequent fill included angular rock used.

#### d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

According to the City of Hoquiam, the project site is mapped as having High Liquefaction susceptibility. The capacity of soft soils to amplify earthquakes has been mapped by the Department of Natural Resources.

#### e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

Grading will be needed to prepare the building site, and other site components. Approximately 110,279 cubic yards of material will be excavated at the Project Site, from within an area approximately 46.5 acres in size, associated with construction of the facilities. A total of approximately 41.2 acres of the site will be graded to prepare the site.

Table 1 describes the grading quantities for the project site.



**Table 1 Project Grading Quantities**

| Site Area                               | Depth of Excavation (feet) | Area of Excavation/Clearing (square feet) | Total Quantity (cubic feet) |
|-----------------------------------------|----------------------------|-------------------------------------------|-----------------------------|
| Silos                                   | 8.2                        | 49406                                     | 405,129                     |
| Pelleting line building                 |                            | 21797                                     | 178,735                     |
| Wet milling line building               |                            | 5167                                      | 42,369                      |
| Truck dumper 1                          |                            | 1550                                      | 12,710                      |
| Truck dumper 2                          |                            | 1550                                      | 12,710                      |
| Truck dumper 3                          |                            | 1550                                      | 12,710                      |
| Rampa truck dumper 1                    | 4.9                        | 6329                                      | 31,012                      |
| Rampa truck dumper 2                    |                            | 6329                                      | 31,012                      |
| Rampa truck dumper 3                    |                            | 6329                                      | 31,012                      |
| Truck scale 1                           |                            | 1,507                                     | 7,384                       |
| Truck scale 2                           |                            | 1,507                                     | 7,384                       |
| Moving floor 1                          |                            | 1,130                                     | 5,537                       |
| Moving floor 2                          |                            | 1,130                                     | 5,537                       |
| Moving floor 3                          |                            | 1,130                                     | 5,537                       |
| Chips cleaning system                   |                            | 3,617                                     | 17,723                      |
| Drying island                           |                            | 51,150                                    | 250,635                     |
| Pelleting silos + RCO                   |                            | 5,328                                     | 26,107                      |
| North pound                             | 2.0                        | 35,715                                    | 71,430                      |
| South pound                             |                            | 27,728                                    | 55,456                      |
| Clearing for circulation, parking, etc. | 1.0                        | 1,795,689                                 | 1,795,689                   |
|                                         |                            | <b>TOTAL CUBIC FEET</b>                   | <b>3,005,818</b>            |
|                                         |                            | (Cubic yards)                             | 111,327                     |

**f. Could erosion occur because of clearing, construction, or use? If so, generally describe.**

There is a minimal, temporary risk that short-term soil erosion will occur during construction as a result of grading and earthwork activities at the project site. There are no significant cumulative impacts to earth resources resulting from the project.

**g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?**

Around 16% of the site will be covered with impervious surfaces after completion of construction.

**h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any.**

The use of construction Best Management Practices (BMPs) will reduce the minimal risks and will include the adherence to a Temporary Erosion and Sediment Control (TESC) plan. PNWRE will obtain a National Pollution Discharge Elimination System (NPDES) Construction Stormwater Permit and a City of Hoquiam grading permit prior to construction and grading activities at the project site.

## 2. Air

### **a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.**

Air quality impacts at the project site resulting from construction are not expected to be significant. Construction activities could result in temporary, localized increases in particulate concentrations due to emissions from typical construction-related sources. Emissions from diesel equipment could temporarily reduce ambient air quality, but the project will use equipment that complies with applicable current regulations to minimize risk. Implementation of reasonable precautions during construction and compliance with regulations regarding engines, off-site odors, and off-site dust are expected to prevent significant air quality impacts. Additionally, compliance with the Olympic Regional Clean Air Agency (ORCAA) permit will be required.

Operational air impacts from the project will result from equipment and vehicle emissions. Particulate matter and visible emissions will be emitted during facility, vehicle, and vessel operations.

Stationary sources of diesel particulate matter (DPM) would be emitted at rates greater than regulatory de minimis levels by the emergency generator and diesel engines that power the emergency fire water pumps, but these sources would only operate during an emergency, and would fall within acceptable cancer risk and ORCAA thresholds.

Mobile DPM source emissions would result from diesel-powered trucks and marine bulk vessels traveling to and from the Project Site to deliver fiber feedstock and receive pellets respectively. Feedstock will be trucked to the site each day. It is assumed that construction workers will contribute to a temporary increase in traffic in the area.

Although the final number of truck movements will depend on the capacity of trailers, compaction rates of fiber feedstock (mill and harvest residuals) and pellets, it is estimated that at full operations, approximately 128 trucks per day, operating 7 days per week, will serve the site.

Trucks delivering fiber feedstock to the terminal, and vessels carrying the product from the Project Site, will be operated by third parties. Total GHG emissions from the Project would represent minor contributions to local, regional, and global GHGs and would not be a significant source of emissions when compared to standard benchmarks.

The project will induce emissions of air contaminants in the region, thereby requiring an approved Notice of Construction (NOC) application from the Olympic Region Clean Air Agency (ORCAA). The facility is not expected to generate criteria pollutant emissions in quantities that would trigger the need for a Prevention of Significant Deterioration (PSD) permit but is anticipated to trigger the need for a Title V Air Operating Permit. The facility would be an area source of hazardous air pollutants (HAP) as potential emissions of each individual HAP are less than the applicable major source threshold of 10 TPY. Total HAP is less than the combined HAP major source threshold of 25 TPY.

**b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.**

There are no known off-site emissions or odors that may affect the proposed project.

**c. Proposed measures to reduce or control emissions or other impacts to the air, if any.**

Implementation of reasonable precautions during construction and compliance with regulations regarding engines, off-site odors, and off-site dust are expected to prevent significant air impacts. Additionally, the contractor will comply with the ORCAA permit.

### **3. Water**

#### **a. Surface Water:**

**1. Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe the type and provide names. If appropriate, state what stream or river it flows into.**

The following is a summary of the Wetland and Waterbody Delineation and Assessment Report (WSP, 2019), which was conducted for a previously proposed potash export facility (proposed by BHP but not constructed) that was included on the subject parcel.

Wetland A (offsite) is directly to the west of the Project Area. Wetland B and C are north of the Project site. Based on the City's SMP (HMC 11.05) which establishes buffers for all regulated wetlands, there is a 150-foot buffer associated with Wetland A. Ditches are exempt from regulation as wetland under the SMP, and as such, they do not have a regulatory buffer.

According to the *Wetland and Waterbody Delineation and Assessment Report* (BergerABAM, December 2017), there are wetlands offsite to the north and west and three ditches (Ditches 1, 2 and 3) within the Project Area. The water features are shown on Figure 3.

Ditch #1 is a shallow ditch that runs parallel to the north side of a portion of Airport Way. And then continues north along the east side of Paulson Road. The ditch collects stormwater and runoff from the western half of the site and conveys it north to an outfall at the north end of the ditch which conveys water to the Refuge to the west. This ditch was constructed as part of the NPDES general permit (WAR000130), to convey treated stormwater to an outfall to the west toward the Refuge and Grays Harbor. Vegetation identified in Ditch 1 includes reed canary grass, soft rush, colonial bent grass, velvet grass, white clover, horsetail, and cattail, among other species. Soils within this ditch exhibited primary indicators of hydrology at the time of the field investigations, as well as indicators of hydric soil conditions.

[illegible]

SEPA Environmental checklist (WAC 197-11-960)

Ditch #3 consists of two wide, shallow ponds/swales located near the center of the study area. These two ponds are hydrologically connected by a culvert, though the culvert is currently in disrepair. These ponds were created as part of NPDES general permit (WAR000131), for the purpose of detaining and treating stormwater and then conveying it northward toward similar drainage features excavated into Wetlands B and C, and ultimately on to waters of Grays Harbor through the outlet in the northwest corner of Wetland C. Vegetation, hydrology, and soil conditions in the ponds that comprise Ditch #3 are similar to those species present in Ditch #1 and Ditch #2. At the time of the site investigation, the eastern pond appears to have had a recent modification in hydrologic regime, as most of the vegetation, including several willows, has died.

The project has been designed to avoid all direct impacts to the water features described.

**2. Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.**

The project will not require any work over, nor within 200 feet, of state shorelines.

**3. Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.**

There will be no fill or dredge material that would be placed in or removed from the surface water or wetlands.

**4. Will the proposal require surface water withdrawals or diversions? Give a general description, purpose, and approximate quantities if known.**

The project will not require any surface water withdrawal or diversion.

**5. Does the proposal lie within a 100-year floodplain? If so, note the location on the site plan.**

A small portion of the northeast corner of the parcel is within the 1% annual chance floodplain, but that section is outside of the project footprint (Figure 4)

**6. Does the proposal involve any discharge of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.**

The project does not involve any discharge of waste materials to surface waters.

**Figure 4 Flood Hazard Areas**



#### **b. Ground Water:**

- 1. Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give a general description, purpose, and approximate quantities if known.**

No groundwater will be withdrawn from a well for drinking water or other purposes. The City of Hoquiam's municipal drinking water will be used on the project site.

- 2. Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.**

No waste material will be discharged into the groundwater from septic tanks or other sources.

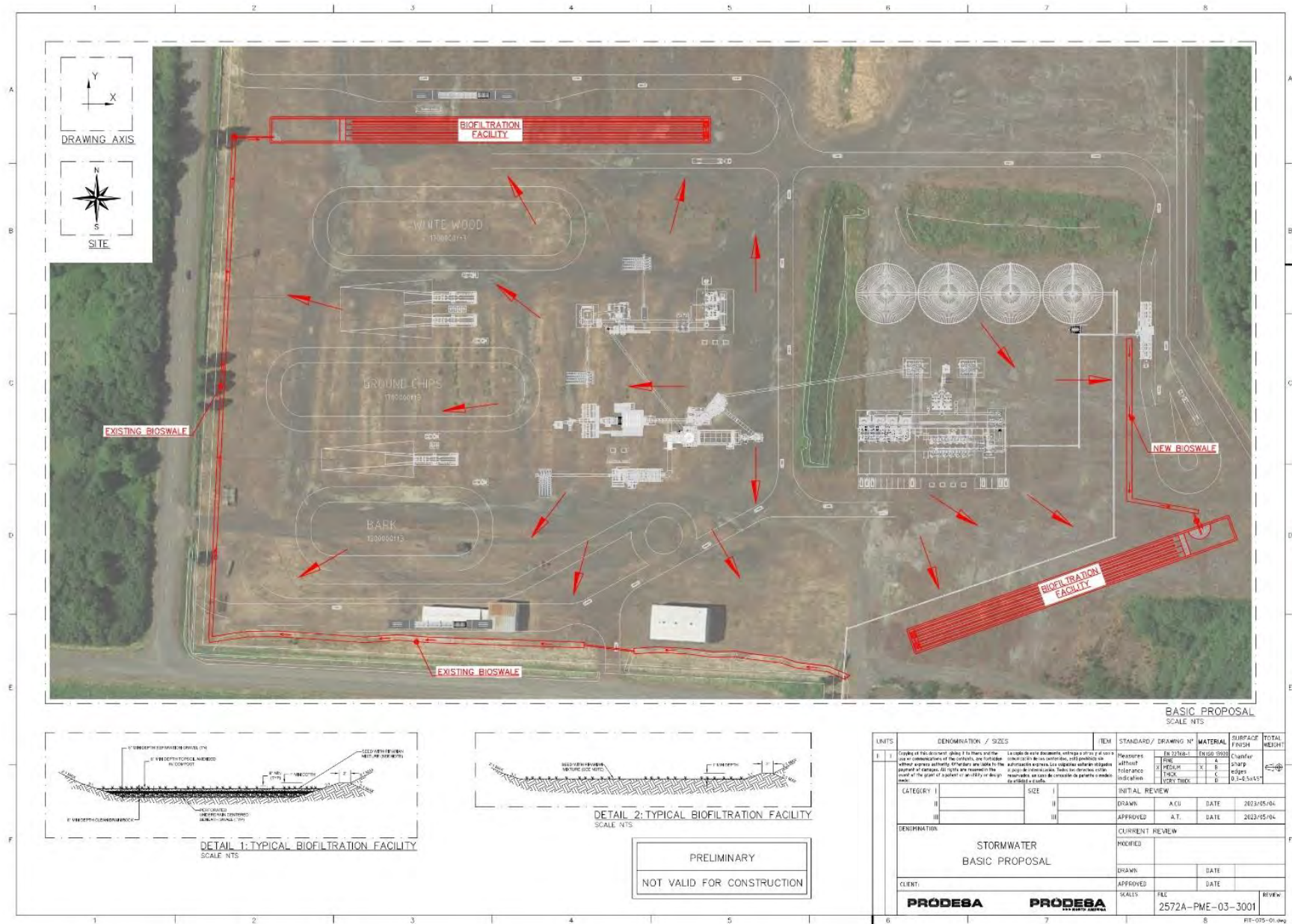
#### **c. Water Runoff (including stormwater):**

- 1. Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.**

A stormwater basic proposal is provided below, which depicts the locations of two biofiltration facilities, one existing bioswale, and one new bioswale (Figure 5).



Figure 5 Stormwater Plan



Stormwater runoff during construction will be managed through implementation of BMPs consistent with construction stormwater permit requirements and plans, and may include the following:

- Construction activities will be conducted in compliance with Ecology's construction stormwater NPDES permit requirements, the Surface Water Quality Standards for Washington (WAC 173-201A), or other conditions as specified in the Water Quality Certificate (WQC).
- Project construction will be completed subject to a water quality certification and in compliance with Washington State Water Quality Standards (WAC 173-201A), including limits on turbidity.
- Petroleum products, fresh cement, lime, concrete, chemicals, or other toxic or deleterious materials will not be allowed to enter into surface waters or onto land where there is a potential for reentry into surface waters.
- Fuel hoses, oil drums, oil or fuel transfer valves, fittings, etc., will be checked regularly for leaks, and materials will be maintained and stored properly to prevent spills.
- The contractor will prepare a Spill Prevention Control and Countermeasure (SPCC) plan and use it during all in-water demolition and construction operations. A copy of the plan will be maintained at the work site.
- The SPCC plan will outline BMPs, responsive actions in the event of a spill or release, and notification and reporting procedures. The plan will also outline management elements, such as personnel responsibilities, Project Site security, site inspections, and training.
- The SPCC plan will outline the measures to prevent the release or spread of hazardous materials found on site and encountered during construction but not identified in contract documents, including any hazardous materials that are stored, used, or generated on the construction site during construction activities. These items include, but are not limited to, gasoline, diesel fuel, oils, and chemicals.
- Applicable spill response equipment and material will be designated in the SPCC plan.

**2. Could waste materials enter ground or surface waters? If so, generally describe.**

Stormwater at the site has a low potential to be impacted; cleanup of any spills of dry material in the facility would be accomplished with vacuum equipment and the material would be returned to product storage, loaded into the vessel, or disposed off-site.

**3. Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.**

The project will not alter or otherwise affect drainage patterns in the vicinity of the project site.

**4. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any.**

The project will include the following mitigation measures to reduce impacts associated with stormwater runoff below the level of significance:

- The proposed stormwater detention and treatment facilities have been designed at two locations (shown on stormwater basic proposal above) to preserve existing drainage patterns to the largest extent possible.



- The project will comply with City of Hoquiam stormwater regulations (HMC 11.05).
- The project will include new stormwater detention and treatment ponds to provide flow control and water quality treatment of stormwater, if necessary, before discharge through existing outfalls on the site.
- Catch basins will be blocked in the event of a pellet spill, and potentially impacted runoff will be contained and discharged to the wastewater system or to an approved disposal facility.
- Stormwater management will be conducted and managed in accordance with state and local regulatory requirements.

The project will comply with the following measures to protect water resources during project operations:

- Secondary containment will be provided at the onsite fueling station to contain any accidental releases.
- The facility will control risks during operations by following the industrial Stormwater Pollution Prevention Plan (SWPPP) and SPCC plan to prevent liquid products from leaving the containment areas. Spill kits will be placed in strategic and easily accessible locations for use if small spills occur; containment, control, and cleanup procedures will be immediately implemented, including notifying Ecology and other resource agencies as required by law.
- Stormwater treatment facilities would infiltrate stormwater runoff from new and existing impervious surfaces to the extent possible, or the stormwater runoff will be collected, treated, and discharged to the bay via existing outfalls. Stormwater treatment would comply with the most current version of Ecology's Stormwater Management Manual for Western Washington.
- The wood biomass pellets will be transferred to the product storage building and vessels via covered conveyors in order to protect pellets from rain exposure and avoid fiber feedstock or pellets blowing or spilling from the conveyors. Spill pans and side skirts will contain spills or fugitive dust from the return belt.
- All equipment will be routinely checked for leaks and other problems that could result in the discharge of petroleum-based products or other materials into the waters of Grays Harbor.
- Pellet spills on land will be cleaned up by sweeping, vacuum truck, or other means, and returned to product storage or disposal.

#### 4. Plants

##### a. Check the types of vegetation found on the site:

- ☒ deciduous tree: alder, maple, aspen, other
- ☐ evergreen tree: fir, cedar, pine, other
- ☒ shrubs
- ☒ grass
- ☐ pasture
- ☐ crop or grain
- ☐ orchards, vineyards, or other permanent crops.
- ☐ wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
- ☐ water plants: water lily, eelgrass, milfoil, other
- ☒ other types of vegetation

**b. What kind and amount of vegetation will be removed or altered?**

The impacts to onsite vegetation at the project site have been minimized and avoided to the extent practicable by locating buildings and roads in previously disturbed areas where possible; however, the majority of the site has been previously disturbed and will be cleared for construction of the new facility. The project will require the removal and/or alteration of all vegetation that is within the footprint.

**c. List threatened and endangered species known to be on or near the site.**

The US Fish and Wildlife Service (USFWS) Information for Planning and Consulting (IPaC) tool does not indicate the presence of any threatened or endangered plant species known to be on or near the project site.

**d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any.**

Prior to the issuance of building permits, PNWRE will develop a landscape design for the project to control erosion and to satisfy the City of Hoquiam Landscaping and Screening ordinance (HMC 10.05.065).

**e. List all noxious weeds and invasive species known to be on or near the site.**

Reed canary grass and Himalayan blackberry were both identified in the project vicinity.

**5. Animals** <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-5-Animals>

**a. List any birds and other animals that have been observed on or near the site or are known to be on or near the site.**

**Examples include:**

- **Birds:** hawk, heron, eagle, songbirds, other: osprey
- **Mammals:** deer, bear, elk, beaver, other:
- **Fish:** bass, salmon, trout, herring, shellfish, other:

**b. List any threatened and endangered species known to be on or near the site.**

Information regarding listed species was obtained from the U.S. Fish and Wildlife Service (USFWS) Information Planning and Consultation (IPaC), the WDFW database Priority Habitats and Species (PHS) on the Web and SalmonScape, and NOAA Fisheries Northwest Region website. Table 2 identifies the species listed under the ESA that have the potential to occur within or near the Project Site.

**Table 2 ESA-listed Species in the Project Area**

| Species Name                                                  | ESA Listing Status | Critical Habitat |
|---------------------------------------------------------------|--------------------|------------------|
| <b>Birds</b>                                                  |                    |                  |
| Marbled Murrelet<br>( <i>Brachyramphus marmoratus</i> )       | Threatened         | None             |
| Western Snowy Plover<br>( <i>Charadrius nivosus nivosus</i> ) | Threatened         | None             |
| Yellow-billed Cuckoo<br>( <i>Coccyzus americanus</i> )        | Threatened         | None             |
| <b>Fishes</b>                                                 |                    |                  |
| Bull Trout<br>( <i>Salvelinus confluentus</i> )               | Threatened         | None             |
| <b>Insects</b>                                                |                    |                  |
| Monarch Butterfly<br>( <i>Danaus plexippus</i> )              | Candidate          | None             |

**c. Is the site part of a migration route? If so, explain.**

The City of Hoquiam is located in the Pacific Flyway, which extends from Mexico northward into Canada and the state of Alaska. Non-ESA listed migratory birds that are likely to be found in the area include but are not limited to: eagles, osprey, swifts, gulls, grebes, grosbeaks, flycatchers, hummingbirds, and dowitchers.

**d. Proposed measures to preserve or enhance wildlife, if any.**

According to the Biological Evaluation (WSP, May 2019) and Critical Areas Assessment (WSP, July 2019), birds, fish, and mammals may experience minimal, temporary impacts during construction, increased vessel traffic, noise, and construction lighting, but these impacts do not rise to a level of significance.

Even though the impacts to animals are not considered significant, PNWRE has incorporated mitigation measures into its Project to minimize water quality and noise impacts, which will also reduce construction impacts to terrestrial animals.

Construction activities with the potential to affect nesting migratory birds, such as tree and vegetation removal, would be conducted consistent with the provisions of the Migratory Bird Treaty Act (MBTA), which requires that nests of migratory birds be removed only at times when nests are inactive. Tree and vegetation removal would be conducted outside the active nesting season to the extent practicable. If any tree or vegetation removal is required within the time when nests could potentially be active (generally January to August), pre-disturbance nest surveys would be conducted to document whether any trees or vegetation to be removed contain active nests.

An osprey nest that is located on a power pole on the western boundary of the site may be affected by the project, so it will be relocated when the nest is inactive as part of the project, in accordance with USFWS best practices. Finally, to minimize the likelihood that vehicles will strike wildlife during construction, PNWRE will require that construction contractors operating vehicles receive training for awareness and avoidance of wildlife in the area.

Because the Project is located in a developed, industrial area, no significant, adverse environmental impacts to birds, fish, and mammals are anticipated from the Project's operation. The Project may slightly increase the impacts from truck traffic, noise, and lighting, but these impacts do not rise to a level of significance.

**e. List any invasive animal species known to be on or near the site.**

There are no known invasive animal species known to be on or near the site.

## **6. Energy and Natural Resources**

**1. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.**

Construction of the project will require the use of electric, natural gas, and petroleum fuels.

The project will use electric and natural gas energy to meet the completed project's needs. The electricity will be provided by Grays Harbor Public Utilities District and will power conveyors, rotating equipment, the WESP/RTO/RCO/Drying system, the ship loader, other equipment, and support facilities (e.g., heating, lighting, etc.) needed to operate the site. The site will also include emergency diesel powered generators and fire pumps. These will be used only when power is not available to the site in an emergency or during a fire and during routine testing. The generators will only supply power to safely shut down the facility and not to operate all systems.

The biomass drying system will use natural gas to start-up the grate furnace, operate the RTO, and operate the RCO. PNWRE estimated the energy consumption for the proposed biomass export facility for use in the air quality and GHG analysis. The total energy consumption is estimated to be 18.5MW.

**2. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.**

The project includes the construction of five, 105-foot diameter by 102-foot-high silos, which will be the largest structures on the site. The silos would not interfere with the use of solar energy by adjacent properties, nor would any other part of the project.

**3. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.**

Energy conservation measures that will be part of the facility design will include the following.

- Compliance with the Washington State Energy code.
- Selecting energy-efficient equipment, including electrical motors designed for energy efficiency.
- Using LED lighting at the site

## 7. Environmental Health

**a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur because of this proposal? If so, describe.**

A Phase I Environmental Site Assessment (Phase I) was performed by Stantec Consulting Services, Inc. and is summarized in this section (Stantec, May 11, 2023).

The property was tidal mudflats until the early 1970s when dredged material was used to raise the surface grade and rock was imported for surfacing material. Aerial photographs indicate the Subject Property was used for lumber storage for most of the 1980s and 1990s. Lumber storage was phased out in the late 1990s and there has been no apparent use since that time.

The site has two prefabricated metal buildings located along Airport Way. The buildings appear to have been constructed in the late 1970s or early 1980s and were used for office space, storage space, and vehicle maintenance. The buildings have not been used in approximately 25 years and are currently in poor condition. There is a small wood-frame building associated with truck scales on the north side of the westernmost building.

During the construction of the plant, silos and new conveyor system, the contractor will adhere to the City of Hoquiam's noise, dust, vibration, and hazardous waste standards.

The environmental health hazards within the plant are noise, vibration, dust, and potential for fire. The specialized equipment and techniques will be implemented to limit dust emission, degradation in storage, self-heating and potential ignition. The plant, storage, and conveyor systems will be constructed to meet all the relevant safety guidelines. See Noise section, below, for relevant standards.

The Project will adhere to the City of Hoquiam Air Quality Standards (10.05.120, Chapter 70.94, 173-400 through 173-401, and 173-460 WAC).

The Project will adhere to the City of Hoquiam's Vibration and Concussion standards, which state that no use on a parcel shall generate vibration or concussion that other parcels can detect without the aid of instruments except during periods of construction (Ord. 04-07 §19, 2004; Ord. 00-09 §4, 2000).

The Project will adhere to the City of Hoquiam's Use and Storage of Hazardous Substances. The use and/or storage of hazardous substances, as defined in RCW 70.105.010(14) shall be permitted only in the C-1, C-2, and I district. All hazardous substances shall be stored and/or transported in approved containers that prevent any leakage to the air, earth, and/or surface or ground water.

The Project is not anticipated to have impacts from spills, noise, or vibration associated with construction or the completed project.

**1. Describe any known or possible contamination of the site from present or past uses.**

The Project site appears on the Recovered Government Archive State Hazardous Waste Site (RGA HWS) List. The listing is dated 1995 and this corresponds to the Project area's use as a log and lumber storage yard for the adjoining Rayonier mill. The Rayonier mill is listed as having had previous soil and groundwater impacts from petroleum products, lead, PCBs, and dioxins and furans. The facility was also included on the CSCSL list. Ecology's Site Cleanup Details database indicates that the initial investigation of the Rayonier facility was conducted in July 1992 and Ecology issued an Early Notice Letter in September 1992. The database information indicates that confirmed impacts to soil from petroleum, lead, PCBs, dioxins, and groundwater impacts from petroleum and lead were remediated and the facility received a No Further Action (NFA) determination in January 2002. The reports reference sampling and remedial excavation of soil in the "east ditch" along Airport Way and remedial excavation of lead-impacted soil from the maintenance area. The NFA Letter references several investigations and reports beginning in September 1992 reviewed towards the NFA determination.

**2. Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.**

Phase I identified the presence of arsenic in groundwater and dioxins/furans in soil above their applicable allowable levels. No other contaminants were identified. All soil excavated during construction will be handled and disposed of in accordance with the Contaminated Media Management Plan prepared for the project. Soil excavated as part of Project development will be isolated and stored on an impervious layer prior to disposal offsite at an approved facility.

**3. Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.**

Construction equipment will use petroleum-based fuels and petroleum- or vegetable- based lubricants. The contractor will prepare and implement an SPCC plan to avoid, minimize, and, if necessary, respond to fuel and lubricant releases during construction. Toxic or hazardous chemicals will be stored within containment. Basic safety measures for storage of any chemicals are detailed on the individual safety data sheets, and PNWRE will follow those prevention, response, and storage directions.

Because fiber feedstock is not a hazardous substance, the risks to human health and the environment from a fiber feedstock spill are low. Generally, any fiber feedstock spill is likely to be of a small quantity (from a trace amount to pounds) and would be readily cleaned up due to Project design (impervious surfaces at points where spill could occur). The risk of a marine spill is low based on the Project's location relative to the marine environment. The risk of a truck spill is highest on the Project Site, but truck speeds and impervious site conditions would minimize the risk of spill and allow for cleanup to occur should a spill occur.

#### 4. Describe special emergency services that might be required.

Fire suppression equipment (sprinklers) will be installed and used throughout the process. Buildings will comply with local and Washington State requirements for fire suppression systems. The storage silos will be designed with nitrogen injections systems. No special emergency services are anticipated at this time.

#### 5. Proposed measures to reduce or control environmental health hazards, if any.

No additional measures to reduce or control environmental health hazards beyond those previously mentioned are required.

#### b. Noise

##### 1. What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

Noise in the project area is generated by adjacent uses and includes heavy equipment, rotating equipment operation, conveyance equipment, marine shipping traffic, vehicle traffic, and air traffic from a nearby airport. There is no noise in the area that is anticipated to affect the project.

##### 2. What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site)?

Noise would be generated during construction from the use of equipment such as:

- Bulldozers
- Front-End Loaders
- Cranes
- Excavators
- Road Graders
- Dump Trucks
- Semi-Trucks
- Pile Driving Equipment
- Concrete trucks
- Skid Steer

After construction, operation of the facility would be a new source of noise. The primary source of noise would be operation of the hammermill equipment. The estimated noise levels for planned equipment are shown in Table 3 below. The facility will include noise suppression within the plant to minimize the effects offsite.

**Table 3 Equipment Noise Levels**

| Equipment       | Noise Level | Placement |
|-----------------|-------------|-----------|
| Wet Hammer mill | 100 dBA     | Outdoor   |

|                     |        |         |
|---------------------|--------|---------|
| Wet Hammer mill fan | 88 dBA | Outdoor |
| Dry Hammer mill     | 96 dBA | Indoor  |
| Dry Hammer mill fan | 85 dBA | Outdoor |
| Pellet mill         | 93 dBA | Indoor  |
| Cooler fan          | 97 dBA | Indoor  |

The land used immediately adjacent to the site is mostly industrial in nature and would not be affected by the noise from the pellet plant. There is a forested area between the facility and the schools and residences to the northeast of the railroad tracks that will provide a noise buffer.

### **3. Proposed measures to reduce or control noise impacts, if any.**

Construction of the project would adhere to City of Hoquiam code (HMC 3A.30.010) for the generation of construction noise only between the hours of 7:00 am through 8:00 pm. Noise minimization methods will include prohibiting pure-tone backup alarms, restrictive diesel-powered equipment locations, using continuous loading methods, and installing temporary noise barriers.

Equipment at the completed plant will be mounted to isolation pads to reduce vibration and sound impacts.

## **8. Land and Shoreline Use**

### **a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.**

The Project is located in an existing industrial area zoned and designated for industrial use by the Hoquiam Municipal Code (HMC) and Comprehensive Plan and designated as High Intensity by the Shoreline Master Program. The Project will have no significant, adverse environmental impacts to land and shoreline use because it will comply with the policies and regulations of the Hoquiam Municipal Code and Shoreline Master Program. The Project is outside of the Shoreline Buffer. The Project will not affect current land uses nearby or adjacent properties.

### **b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses because of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?**

The project site has not been used as working farmlands or working forest lands.

#### **1. Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how?**

The Project will not affect or be affected by surrounding working farm or forest land normal business operations.

### **c. Describe any structures on the site.**



The site has two prefabricated metal buildings located along Airport Way. The buildings appear to have been constructed in the late 1970s or early 1980s and were used for office space, storage space, and vehicle maintenance. The buildings have not been used in approximately 25 years and are currently in poor condition. There is a small wood-frame building associated with truck scales on the north side of the westernmost building.

**d. Will any structures be demolished? If so, what?**

All structures on the site will be demolished.

**e. What is the current zoning classification of the site?**

The site is zoned as Industrial.

**f. What is the current comprehensive plan designation of the site?**

The site has a comprehensive plan designation of Industrial.

**g. If applicable, what is the current shoreline master program designation of the site?**

The project site is not within the shoreline zone.

**h. Has any part of the site been classified as a critical area by the city or county? If so, specify.**

According to the City of Hoquiam's Comprehensive land Use Plan (February 2009), HMC 11.05.830 states "The city does not contain any critical aquifer recharge areas." Therefore, CARAs will not be impacted by the project.

The Project area is classified as a Tsunami hazard zone. The Project site also is mapped as having High Liquefaction susceptibility. The capacity of soft soils to amplify earthquakes has been mapped by DNR.

The Project site is mapped class D to E, as susceptibility to earthquake damage.

**i. Approximately how many people would reside or work in the completed project?**

No people would reside at the Project Site. The completed facility will employ approximately 52 employees.

**j. Approximately how many people would the completed project displace?**

The project will not displace anyone.

**k. Proposed measures to avoid or reduce displacement impacts, if any.**

No measures are required.

**l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.**

The Project is consistent with existing land uses and the current Hoquiam Comprehensive Plan and zoning requirements.

**m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any.**

The project will not affect any agricultural or forest lands.

## 9. Housing

**a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.**

No housing is included as part of the Project.

**b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.**

No housing would be eliminated as part of the Project.

**c. Proposed measures to reduce or control housing impacts, if any.**

No measures are required.

## 10. Aesthetics

**a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?**

The tallest structures included in the Project are four, 102-foot-high storage silos, which will be constructed of metal. The exhaust stack will be approximately 80 feet high.

**b. What views in the immediate vicinity would be altered or obstructed?**

The Project would be visible from the east, north and south views and would alter some views in the area, however these existing views are of an industrial site. No views would be obstructed or materially blocked by the Project. The Project will have no impact on adjacent residential views of the shoreline.

**c. Proposed measures to reduce or control aesthetic impacts, if any.**

No measures are required to reduce or control aesthetic impacts.

## 11. Light and Glare

**a. What type of light or glare will the proposal produce? What time of day would it mainly occur?**

Lighting used during night-time construction or times of low light, if needed, will be used only in active work areas and for safety. Construction night-time lighting, if nighttime construction is needed, will be directional and will minimize glare and light spillage to the extent practicable.

Light spillage onto adjacent properties or to water during nighttime construction will be minimized to the extent practicable using shaded fixtures and directional lighting aimed only in areas for worker comfort and safety.

The Project will adhere to the City of Hoquiam Light and Glare Standards. Any land use creating intensive glare or light shall obscure the view of this glare or light from any point along the property line through the use of fences, walls, or hedge. Outside lighting will point away from the Wildlife Refuge.

**b. Could light or glare from the finished project be a safety hazard or interfere with views?**

Lights will be generally aimed downward and back towards the site if close to property line, thus reducing spillage. The Project will incorporate lighting design and associated directional lighting to minimize glare and light spillage to the extent practicable while still providing the necessary lighting levels for workers' safety and for Federal Aviation Administration (FAA) lighting requirements due to the proximity to Bowerman Airport.

**c. What existing off-site sources of light or glare may affect your proposal?**

Off-site lighting is typical of urban areas and consists of street and building lights. The adjacent Bowerman Airport includes high-intensity runway lights that are activated on approach. This existing lighting will not affect the project as it does not include activities that are sensitive to light. Lighting of adjacent industrial sites and the high school property to the north also have no effect on the proposal.

**d. Proposed measures to reduce or control light and glare impacts, if any.**

The project will incorporate lighting design and associated directional lighting to minimize glare and light spillage to the extent practicable. FAA-approved lighting will be mounted on buildings and structures for aviation safety. No other measures are required.

## **12. Recreation**

**a. What designated and informal recreational opportunities are in the immediate vicinity?**

The John Gable Community Park and Hoquiam Skate Park are located north of the Project Site, north of Emerson Avenue. The facilities include concrete structures for skating, playground equipment, baseball fields, and parking.

The Grays Harbor National Wildlife Refuge is located west of the Project site and is part of the Grays Harbor Estuary. The refuge, established in 1990, encompasses almost 1,500 acres of intertidal flats, open water, salt marsh, and forested habitats and contains walking trails.

**b. Would the proposed project displace any existing recreational uses? If so, describe.**

Construction of the Project could result in indirect impacts from noise to recreational uses on lands adjacent to or near the site, but these impacts will be temporary and are not expected to rise to the level of significance.

The Project Site is an existing industrial facility that does not have any recreational uses. Existing recreational uses would be indirectly affected, but not displaced, by Project construction. Operation of the proposed facility is not anticipated to significantly displace or restrict access to any recreational uses as the proposed facility will be an industrial site used similarly to the existing wood chip facility and current shipping uses at Terminal 3.

**c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any.**

Recreational facilities in the area have some exposure to noise and diesel emissions from truck traffic, and other diesel vehicles from existing industrial uses in the area. The Project is not anticipated to significantly add to the existing noise and emissions; thus, no measures are required.

### **13. Historic and Cultural Preservation**

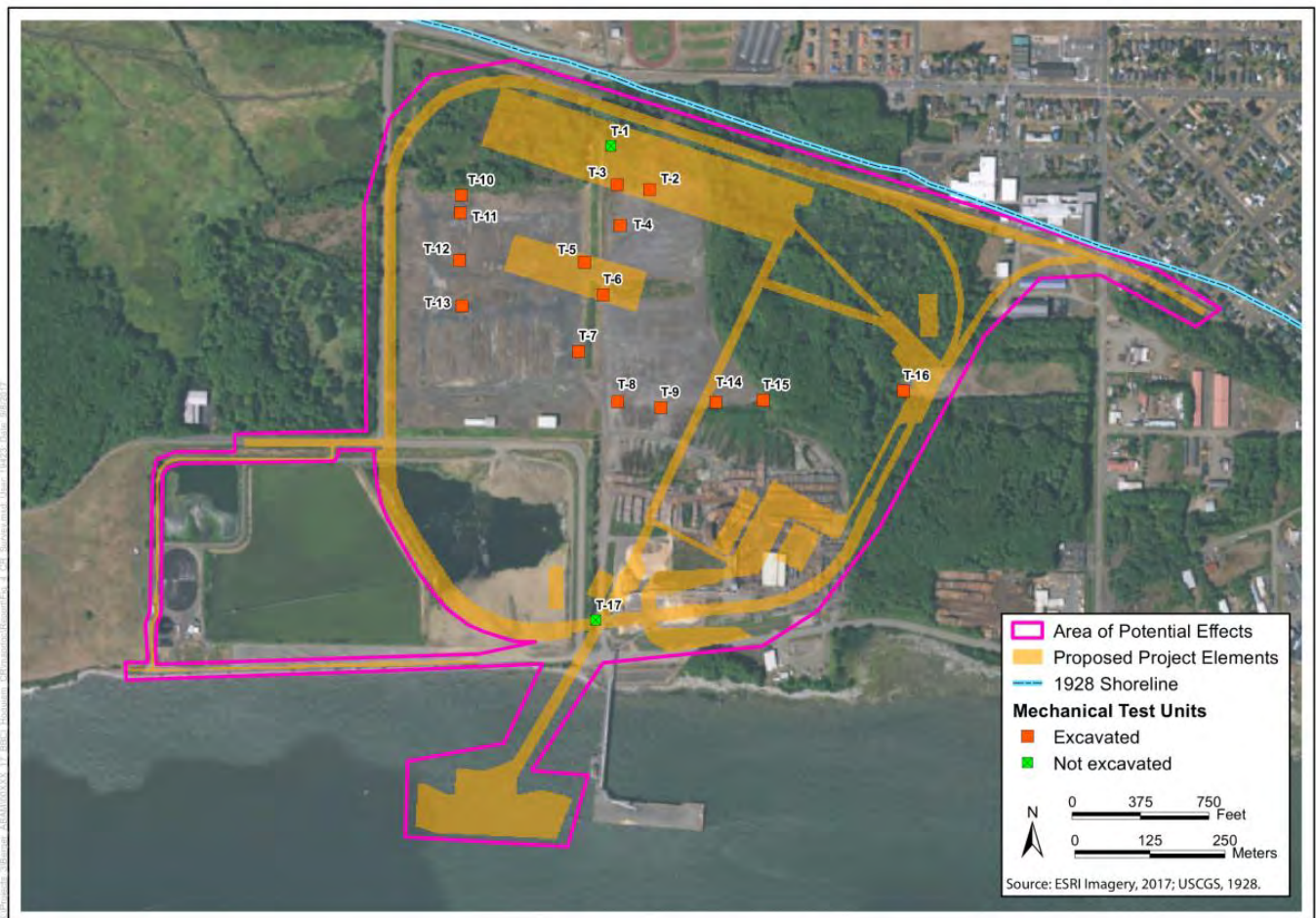
**a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.**

There are no buildings, structures, or sites located on or near the site that are over 45 years listed in or eligible for listing in the national, state, or local preservation registers.

**b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.**

No archaeological deposits were identified during subsurface investigations for the previous BHP proposal (*Cultural Resources Tech Report*, ICF 2019). Across much of the Area of Potential Effects (APE), the pre-development ground surface appears to be between 17 and 18 feet below the ground surface, with the exception of four locations where the pre-development ground surface was at a greater depth than the maximum reach of the excavator that was being used (21 feet).

**Figure 6 Area of Potential Effects and Cultural Survey Sites (BHP Proposal)**



- c. **Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.**

The APE is defined as a geographic area or areas within which the proposed project may directly or indirectly cause a change of character or use of historic properties.

According to the Cultural Resources Report (*Cultural Resources Tech Report*, ICF 2019), the City of Hoquiam maintains a local register of historic places which includes individually registered city landmarks, historic districts, or conservation districts (Hoquiam Municipal Code, Chapter 10.06). The upland portions of the Project Site are not currently accessed by tribal members and use of the uplands would not affect access to the Quinault's treaty resource areas. The Quinault Indian Nation have indicated that members fish in Grays Harbor near the Project Site and areas required for the positioning of vessels for product loading and shipment.

- d. **Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.**

There are no measures proposed to avoid, minimize, or compensate for loss, changes to, and disturbance to resources, as there were none identified within the APE. The Project would have minor effects on fishing by Quinault Indian Nation members during construction and operation of the PNWRE Project. PNWRE is currently coordinating with the Quinault Indian Nation to inform them of the Project and receive input on the proposal.

## 14. Transportation

**a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.**

The street network in the Project vicinity is shown on the site plan and vicinity maps (Figures 1 and 2) in Section A, above. Roadways in the vicinity include Highway 101, State Route 109/West Emerson Avenue, Paulson Road, and Airport Way.

**b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?**

The site is not directly served by public transit. The closest Grays Harbor Transit bus stop is located at Emerson Avenue and Adams Street, approximately one mile from the Project site.

**c. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle, or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).**

Private roads connecting the site to the existing roadway network and for interior circulation will be constructed of aggregate for facility traffic and employees only.

**d. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.**

The operation of the Project will use shipping vessels from Terminal #3, which is in existing use by Willis Enterprises. The Project would increase vessel traffic by approximately one ship every 5 to 6 weeks, or 10 per year.

There is a rail spur located to the north, between the Project site and Emerson Avenue. The Project will not use rail and is not anticipated to affect existing rail traffic.

The Project Site is located approximately 0.25 miles to the east of Bowerman Airport. The Project was designed to minimize indirect impacts to Bowerman Airport. The layout of the storage building and other structures at the site are dictated primarily by the FAA's regulations governing the safe, efficient use and preservation of the navigable airspace in 40 C.F.R. Part 77. Consultation with the FAA is ongoing to ensure the proposed facility does not represent an obstruction to air navigation. The Project will comply with FAA provisions for lighting to ensure no impacts to Bowerman Airport.



- e. **How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and non-passenger vehicles). What data or transportation models were used to make these estimates?**

The completed Project will include approximately 128 traffic trips per day (truck and employee traffic).

- f. **Will the proposal interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.**

The Project would not interfere with, affect, or be affected by the movement of agricultural and forest products on road or streets in the area.

- g. **Proposed measures to reduce or control transportation impacts, if any.**

Truck traffic from the completed Project will be routed to avoid local surface streets and rail crossings within plant design requirements. No other measures are required.

## 15. Public Services

- a. **Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, others)? If so, generally describe.**

PNWRE plans to provide its own site security and utilize fire protection and emergency systems that meet or exceed applicable building standards. It is not anticipated that the Project will result in an increased need for public services.

- b. **Proposed measures to reduce or control direct impacts on public services, if any.**

No measures are required.

## 16. Utilities

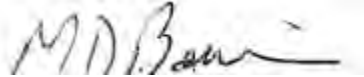
- a. **Circle utilities currently available at the site:**  
electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:

- b. **Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.**

The facilities will use potable water (City), sanitary sewer (City), electricity (Grays Harbor PUD), natural gas (Cascade Natural Gas) and communication services (private). All services will tie into existing nearby utility lines.

### **C. Signature**

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

A handwritten signature in black ink, appearing to read "M.D. Boivin", is written over a light gray rectangular background.

Type name of signee: Mark D. Boivin

Position and agency/organization: CEO, PNWRE

Date submitted: 6/19/2023





**UNITED STATE ENVIRONMENTAL PROTECTION AGENCY**  
RESEARCH TRIANGLE PARK, NC 27111

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

**MEMORANDUM**

SUBJECT: Release of AERMOD & AERMET Version 23132 and MMIF Version 4.1

FROM: Clint Tillerson, Model Development Team Lead  
Air Quality Modeling Group  
Air Quality Assessment Division, Office of Air Quality Planning and Standards

TO: EPA Regional Modeling Contacts

The United States Environmental Protection Agency (EPA), Office of Air Quality Planning and Standards (OAQPS) is releasing new versions (23132) of the AERMOD dispersion model and the AERMET preprocessor AERMOD, replacing AERMOD version 22112 and AERMET version 22112 as the regulatory versions of AERMOD and AERMET. Released concurrently with AERMOD and AERMET is MMIF 4.1 which replaces MMIF 4.0.

This memorandum provides information on these updated programs, including the nature of the updates and the status of the releases regarding regulatory applications. If there are any questions about this new release of the AERMOD Modeling System or issues found with the updated model components, please send an email to [Tillerson.Clint@epa.gov](mailto:Tillerson.Clint@epa.gov).

*Background*

In 2005, the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) was promulgated as the EPA's preferred near-field dispersion model for regulatory applications, replacing the Industrial Source Complex (ISC) model. AERMET is the regulatory meteorological preprocessor for AERMOD and can process National Weather Service (NWS) surface data, NWS upper air data, site-specific data, (i.e., data collected at a nearby representative meteorological station), and pre-processed prognostic meteorological data.

AERMET processes the input meteorological data to calculate boundary layer parameters for input to the AERMOD model.

This release is concurrent with a Notice of Proposed Rulemaking (NPRM) to revise Appendix W to CFR 40 Part 51, *Guideline on Air Quality Models (Guideline)*. The revision to the *Guideline* proposes updates to the regulatory formulation of AERMOD and AERMET and implementation. The proposed updates are included in this release as BETA options and cannot be used for regulatory applications of the modeling system without approval as an alternative model by the appropriate EPA Regional Office and subsequent concurrence by the EPA Model Clearinghouse (MCH). The EPA anticipates the proposed *Guideline* to be finalized in the Spring of 2024.

For more information regarding the regulatory application of the AERMOD Modeling System, please consult the *Guideline*.

## **AERMOD**

AERMOD 23132 replaces the regulatory version 22112. In summary, updates in AERMOD 23132 include numerous small bug fixes related to the BUOYLINE, AREACIRC, RLINE, RLINEXT and SWPOINT source types; updates to error and warning messages; enhancements to the BUOYLINE and URBANOPT debug files; formulation updates and enhancements to the RLINE and RLINEXT source types, addition of new ALPHA options; and the BETA flag requirement to accept meteorological data processed with the COARE algorithm implemented in AERMET 23132. Note that the ALPHA and BETA options in AERMOD 23132 cannot be used in regulatory applications of the AERMOD Modeling System without EPA Region Office approval as an alternative model and concurrence from EPA's MCH. Refer to the AERMOD Model Change Bulletin #17 for a complete list of changes in AERMOD 23132. Some of the more substantial updates and new options of interest include the following:

### *Proposed Regulatory Updates*

- Reformulation of RLINE source type to bring the RLINE source type into better agreement with other AERMOD source types. There were three main aspects of the reformulation: (1) Wind Speed calculation, (2) Harmonization with AERMOD sources, and (3) Dispersion Coefficients (RLINE - BETA option proposed as formulation update).
- Formulation updates to the Generic Reaction Set Method (GRSM) Tier 3 screening option for NO<sub>2</sub> conversion (GRSM - BETA option proposed as formulation update).

- Requirement of the BETA flag in the AERMOD control file if 'COARE' is found in the SFC meteorological input file header. The presence of 'COARE' in the SFC file header indicates the meteorological data were processed with the COARE algorithm in AERMET ('COARE' SFC Header Flag - BETA option).

#### *New ALPHA Options*

- A treatment for highly buoyant plumes when they penetrate the top of the mixed layer (HBP).
- Area meander for area source types (AREAMNDR).
- Characterization for aircraft sources as area and/or volume source types that accounts for plume rise from aircraft (ARCFTOPT).

#### *Bug Fixes and Enhancements*

- Capability to account for elevated terrain with RLINE and RLINEXT source types.  
**NOTE: When modeling project level conformity and hot-spot analyses, refer to the Office of Transportation and Air Quality (OTAQ) for current guidance for modeling roadway sources.**
- New debug file for urban debug option that reports temperature and vertical potential temperature profiles.
- Ability to use a mixture of 2-digit and 4-digit years across data input files (e.g., SFC meteorology, PFL meteorology, hourly emissions, and hourly background).
- Correction to conversion of 2-digit year to 4-digit year for check on SRFDATA keyword in control file. Year is assumed to be in the 1900s if the year is  $\geq 50$  and in the 2000s if  $< 50$ .
- Correction to conflicts with source group IDs during event processing with BUOYLINE source type.
- Correction for NaN in the urban debug file.
- Correction for false warning message "Julian Day Out of Range" that was issued when using DAYRANGE keyword.
- Requirement of ALPHA flag when RLINEXT source type is specified.
- Correction when AREACIRC sources are listed in an INCLUDED file. Sources were overwritten when multiple reads of AREACIRC sources caused memory conflicts between array sizing and source ID assignments.

- Correction to ARMRATIO minimum and maximum values to match the ranges provided in the AERMOD User's Guide, based on whether the DFAULT keyword is specified.
- Warning message added when the SCREEN option is used with RLINE, RLINEXT, BUOYLINE, SWPOINT, AREA, or LINE source types.
- Correction for inconsistent results between BUOYLINE, RLINE, and RLINEXT source types when modeling for FLAT terrain and depending on how FLAT terrain was specified.

### **AERMET and MMIF**

AERMET 23132 replaces the regulatory version 22112. Version 22112 represented a complete overhaul of the AERMET source code structure, though no updates to the formulation of AERMET were introduced. Version 23132 corrects various bugs reported since the code overhaul. In addition, several enhancements were included related to quality assurance (QA) checks on the number of site-specific sub-hourly observations and data reported in the QA output file. Perhaps the most substantial update to AERMET is the addition of the Coupled Ocean Atmosphere Response Experiment (COARE) air-sea flux procedure for processing meteorological data representative of a marine boundary layer needed for modeling offshore sources. The implementation of COARE in AERMET is being proposed as a regulatory update to AERMET in the proposed *Guideline* updates and replaces the stand-alone AERCOARE meteorological processor which has recently been approved as an alternative model for several offshore source permit applications. Note that the use of meteorological data processed with the COARE option in AERMET is a BETA option in AERMOD and requires EPA Regional Office approval and EPA MCH concurrence until this updated formulation of AERMET has been finalized in the *Guideline*. Refer to the AERMET Model Change Bulletin #13 for a complete list of changes in AERMET 23132. Some of the more substantial updates and new options of interest include the following:

#### *Proposed Regulatory Update*

- Addition of COARE air-sea flux procedure (BETA flag required in AERMOD).

#### *Bug Fixes and Enhancements*

- Additional QA on the number of observations/hour in sub-hourly site-specific data.

- Added NWS elevation to SURFACE EXTRACT and QAOUT file when derived from ISHD data.
- Additional QA checks to ONSITE/PROG heights when OSHEIGHTS is not specified.
- Updated AERMET to allow multi-level data to be out of ascending order.
- Check added on OUTPUT and PROFILE file for format overflows and NaN.
- Modified PBL\_PROC and WRITE\_SRSS to only get target sounding hours and UPPERAIR sunrise/sunset times when UPPERAIR data being used in Stage 2.
- Correction in subroutine MECH\_HT to use unsmoothed mixing height when  $u^*$  is missing for the hour.
- Initialized variables to correct issues with Linux compilation.
- Correction to allow primary surface characteristics keywords to be used with AERSURF2 file in subroutine AERSURF.
- Correction for sounding target hours when beginning of window is in previous day of sounding in subroutines PBL\_PROC and CHECK\_OBS.
- Correction in UPPERAIR location when using ONSITE/PROG mixing heights and no UPPERAIR data.
- Correction to SURFACE winds to only set to calm if not missing.
- Correction to sum ONSITE sub-hourly precipitation variables instead of averaging.

The addition of COARE in AERMET subsequently required updates to the Mesoscale Model Interface Program (MMIF) to extract additional meteorological parameters from prognostic model output for input to AERMET and modify the AERMET control files generated by MMIF. MMIF 4.1 replaces MMIF 4.0.

May 26, 1992

MEMORANDUM

SUBJECT: Applicability of Prevention of Significant Deterioration (PSD) and New Source Performance Standards (NSPS) to the Cleveland Electric, Incorporated, Plant in Willoughby, Ohio

FROM: Edward J. Lillis, Chief  
Permits Programs Branch, AQMD (MD-15)

TO: George T. Czerniak, Chief  
Air Enforcement Branch, Region V

This memorandum responds to your request for a written applicability determination for a Cleveland Electric, Incorporated, facility in Willoughby, Ohio. As discussed below, my staff has determined that this Cleveland Electric facility is subject to a 100 tons per year (tpy), major source applicability threshold for the PSD requirements at 40 CFR 51.21. If this facility has commenced construction with a minor source construction permit from Ohio, but without undergoing new source review (NSR), as required by 40 CFR 52.21, the source may be in violation of Federal PSD requirements. At this time, the Cleveland Electric Plant does not appear to be subject to the current emissions guideline for municipal waste combustors or NSPS of 40 CFR Part 60, subparts Ca and Ea, respectively. This response has been coordinated with the Compliance Monitoring Branch of the Stationary Source Compliance Division (SSCD), to whom your applicability request was addressed, and with the Standards Development Branch of the Emission Standards Division (ESD) on the applicability of NSPS and emissions guidelines.

In reviewing the information forwarded to our office, we have determined that, for PSD applicability purposes, the Cleveland Electric facility is both a municipal waste incinerator and a fuel conversion plant, as listed at 40 CFR 52.21(b)(1)(c)(iii), and would be major if the source "...emits, or has the potential to emit, 100 tpy of any pollutant subject to regulation under the (Clean Air) Act". The facility appears to meet the criteria for both categories by disposing of

municipal waste using combustion and by producing a low heat value fuel gas. While there are no definitions in the PSD regulations for "municipal waste incinerator," "fuel conversion plant," and other categories listed as subject to the 100 tpy, major source threshold, the Environmental Protection Agency (EPA) has relied on case-by-case determinations in assessing source applicability. These assessments are based on precedents established by NSPS and other regulatory definitions, as well as technical analysis of the character and functions of both the proposed source and the listed source categories. We have used these guidelines in determining that the Cleveland Electric plant is considered listed under two source categories for which the lower PSD applicability threshold applies.

The NSPS regulations define "municipal waste combustor" at 40 CFR 60.51a to mean "...any device that combusts solid, liquid, or gasified (municipal solid waste) including, but not limited to, field-erected incinerators (with or without heat recovery), modular incinerators (starved air or excess air), furnaces (whether suspension-fired, grate-fired, mass-fired, or fluidized bed-fired) and gasification/combustion units." The emissions guideline of subpart Ca also incorporates this definition by reference (40 CFR 60.31a). On page 10 of Cleveland Electric's December 20, 1991 permit application submittal, the source is described as consisting of seven units, charging 50 tons per day (tpd) per unit, "...converting municipal solid waste into...fuel gas." For NSPS purposes, the Cleveland Electric source is a municipal waste combustor and would be subject to the NSPS standards of 40 CFR Part 60, subpart Ea, if each unit were not below the 250 tpd of refuse combustion capacity per unit applicability threshold of subpart Ea [40 CFR 60.50a(a)].

A municipal waste incinerator "combusts" solid waste and thus is functionally synonymous with municipal waste combustor. Accordingly, EPA has adopted the NSPS definition of municipal waste combustor for determining if a source is subject to the 100 tpy applicability threshold for PSD in section 16(1) of the-3- CAA. Section 169(1), as amended by Section 305(b) of the CAA Amendments of 1990 [P.L. 101-549, sec. 305(b)], lists "municipal incinerators capable of charging more than 50 tons of refuse per day" as being subject to the 100 ton emissions threshold. Under EPA's sourcewide plant definition [40 CFR 52.21(b)(5 and 6)], the 50 tpd charging rate applies to the sum of all units at the Cleveland Electric facility (which will be capable of charging a total of 350 tons of refuse per day). Therefore , the Cleveland Electric facility will be a major

source for PSD purposes if the source emits, or has the potential to emit, 100 tpy of any pollutant regulated under the CAA [except HAP's listed under §112(b) of the CAA].

The production of low heat value fuel gas at the Cleveland Electric facility also classifies the source as a fuel conversion plant. Fuel conversion plants obviously include those plants which accomplish a change in state (e.g., solid to liquid to gas) for a fuel. This definition includes conversion of the following fuels: fossil (e.g., coal or oil shale); biomass (e.g., wood or peat); and anthropogenic (e.g., municipal waste derived fuel and inorganic fuel). The majority of such sources are likely to accomplish these changes through either gasification, liquefaction, or solidification. The category of fuel conversion plants may include, but is not limited to, some types of sources within standard industrial classifications 1311, 2819, 2969, 2421, and 2999. Generally, however, applicability for this source category is determined by whether a facility changes the state (e.g., solid to gas) or form (e.g., process sawdust into a pellet) of a fuel. Therefore, the Cleveland Electric facility fits into the fuel conversion plant category as well. In both cases, as a municipal waste incinerator and as a fuel conversion plant, the source is major and subject to PSD requirements if the source has the potential to emit 100 tpy of a regulated pollutant other than a HAP.

If you have any questions concerning our PSD applicability determination, please contact Bill Lamason of my staff at (919) 541-5374. Questions concerning NSPS should be directed to Walt Stevenson, ESD, at (919) 541-5264. On compliance issues, you may contact Clara Poffenberger, SSCD, at (703) 308-8709.

cc: NSR Contacts, EPA Regions I-X.  
K. Berry, AQMD  
C. Poffenburger, SSCD  
W. Stevenson, ESD  
B. Tyndall, OGC  
J. Domike, OE  
B. Lamason, PPB



## Attachment HH

DEC 12 2014

# Georgia Department of Natural Resources

Environmental Protection Division · Air Protection Branch

4244 International Parkway · Suite 120 · Atlanta · Georgia 30354

Telephone: 404/363-7000 · Fax: 404/363-7100

Judson H. Turner, Director

## MEMORANDUM:

TO: Sean Taylor  
THROUGH: Ross Winne, Richard Taylor  
FROM: Jeff Babb  
SUBJECT: SOURCE TEST REPORT REVIEW

The following test has been reviewed and was conducted in an acceptable fashion for the purpose intended.

|                                       |                                                            |
|---------------------------------------|------------------------------------------------------------|
| COMPANY NAME                          | Hazlehurst Wood Pellets, LLC                               |
| COMPANY LOCATION                      | Hazlehurst, GA                                             |
| SOURCE TESTED                         | Pellet Cooler Baghouse S1B Exhaust                         |
| POLLUTANT DETERMINED                  | Volatile Organic Compounds                                 |
| REPORT REVIEWED BY                    | Jeff Babb                                                  |
| TEST WITNESSED BY                     | Jeff Babb                                                  |
| DATE(S) OF TEST                       | August 28, 2014                                            |
| DATE RECEIVED BY APB                  | October 27, 2014                                           |
| MAXIMUM EXPECTED OPERATING CAPACITY   | 20 ODT/HR                                                  |
| OPERATING CAPACITY                    | 21 ODT/HR                                                  |
| ALLOWABLE EMISSION RATE               | 249 Tons/Year                                              |
| APPLICABLE REGULATION                 | Air Quality Permit No. 2499-161-0023-E-01-0, Condition 2.1 |
| CONTROL EQUIPMENT AND MONITORING DATA | N/A                                                        |

| TEST RUN #                           | 1     | 2     | 3     | AVERAGE |
|--------------------------------------|-------|-------|-------|---------|
| POLLUTANT CONCENTRATION (PPM Carbon) | 145.9 | 142.8 | 153.9 | 147.5   |
| EMISSION RATE (LB/HR Carbon)         | 6.62  | 6.07  | 6.55  | 6.41    |
| PERCENT ALLOWABLE (%)                | 19.2  |       |       |         |

OTHER INFORMATION

ISMP calculated M25A emission rate = 7.8 LB/HR as Propane

Ref. No. 201401158 results for M25A VOC Propane = 3.0 LB/HR  
 Ref. No. 201401159 results for Formaldehyde = 0.01 LB/HR  
 Ref. No. 201401160 results for Methanol = 0.01 LB/HR  
 Ref. No. 201401161 results for Acetaldehyde = 0.02 LB/HR  
 Ref. No. 201401159 results for M25A VOC S1B = 7.8 LB/HR  
 Ref. No. 201401165 results for Formaldehyde = 0.01 LB/HR  
 Ref. No. 201401166 results for Methanol = 0.09 LB/HR  
 Ref. No. 201401167 results for Acetaldehyde = 0.06 LB/HR

At a production rate of 21.0 ODT/HR the OTR26 (NCASI WPP1) Total VOC emission rate = 10.9 LB/HR  
 On an ODT basis is 0.52 LB VOC/ODT.  
 Therefore the OTM 26 (WPP1) potential total annual VOC emission rate is 47.7 LB/Year or 19.2% of the allowable VOC emission rate of 249 TON/Year.

## Rev. 05/30/06



October 28, 2003

Mr. Michael Cathey  
Managing Director  
El Paso Energy Bridge Gulf of Mexico, L.L.C.  
1001 Louisiana Street  
Houston TX 77002

Diana Dutton, Esquire  
Akin, Gump, Strauss, Hauer & Feld, L.L.P.  
1700 Pacific Avenue, Suite 4100  
Dallas TX 75201-4675

Dear Mr. Cathey and Ms. Dutton:

This letter responds to communications from El Paso Energy Bridge Gulf of Mexico, L.L.C. (El Paso), regarding preliminary views the Environmental Protection Agency (EPA) Region 6 expressed in a letter dated March 28, 2003, to the United States Coast Guard, and in several subsequent meetings and telephone calls. El Paso's objections to these views are set forth in an "Analysis of Deepwater Port Permitting Requirements" it provided EPA Region 6 at a meeting on May 9, 2003; in Mr. Cathey's June 16, 2003, letter to Commander Mark Prescott; and in Ms. Dutton's letters of July 18, 2003, and August 18, 2003, to EPA attorneys Patrick Rankin and Michael Boydston. EPA's understanding of the facts in this matter is based on representations in that correspondence, in El Paso's Application to the United States Coast Guard for a Deepwater Port (December 2002) (license application), in National Pollutant Discharge Elimination System (NPDES), Prevention of Significant Deterioration (PSD) and Title V permit applications El Paso filed under protest on September 4, 2003, and in El Paso's statements at a meeting with the Regional Administrator for EPA Region 6 on September 12, 2003.

## **BACKGROUND**

Given the Nation's expanding demand for natural gas, a number of entities are in the process of developing plans and permit applications for deepwater ports through which that commodity may be imported from overseas gasification plants. Typically, such deepwater ports would be located on the outer continental shelf of the United States and use existing natural gas pipelines associated with offshore natural gas production to transport the imported gas ashore. Because the vessels transporting the gas carry it in a liquified state and the pipelines carry it in a gaseous state, the primary industrial process that would occur at offshore natural gas ports is conversion of natural gas from liquified to gaseous state for transport ashore. A major capital

expense associated with the ports is generally the construction of offshore fixed facilities on which the re-gasification process will occur. El Paso's proposal, however, is somewhat different.

El Paso proposes to construct and operate a natural gas deepwater port approximately 120 miles off the coast of Louisiana. The proposed port would feature a "submerged turret system" (STS)<sup>1</sup> connected to a short (1.93 miles) pipeline leading to a metering platform. Two other short (3.93 and 1.38 miles) pipelines would convey the natural gas from the metering platform to existing natural gas pipelines operated by other entities for transport ashore. This fixed infrastructure would not include facilities for LNG storage or re-gasification and, under normal circumstances, would not be manned. As explained below, El Paso contends these relatively modest fixed facilities would constitute its entire deepwater port for purposes of federal regulation under the Deepwater Port Act (DPA), Clean Air Act (CAA), and Clean Water Act (CAA).

Only specially designed and equipped liquefied natural gas (LNG) vessels, two of which are now under construction, would be able to deliver natural gas to the fixed infrastructure of the proposed port. Those vessels are identified in El Paso's license application as El Paso Energy Bridge Vessels (EPEBVs). Like most LNG carriers, the EPEBVs would be propelled by steam turbines. The boilers generating the steam would normally be fired with natural gas "boil off" from the cargo on their voyage to the buoy, but by diesel oil while discharging cargo and on the return voyage. Unlike any LNG carrier previously constructed, however, the EPEBVs would be specially outfitted so they could be attached to the STS and re-gasify their LNG cargo before offloading it.

The operator of an EPEBV calling on the port would retrieve the STS, winch it into an opening in the bottom of the vessel's hull, and attach it to the vessel with hydraulically operated locking jacks. It would then ring up "finished with engines" and set a "moored condition" bridge watch. Thereafter, an El Paso representative, a.k.a., "person in charge" (PIC), and "other entities involved in cargo transfer process" would board the vessel. License Application, Appendix M, p. 3. The PIC would inspect the re-gasification system, determine the quantity and quality of the cargo, calibrate metering equipment, assure coordination with the pipeline operators so that maximum operating pressures would not be exceeded, and "issue permission to the vessel operator" to commence the re-gasification and transfer process. *Id.*, p. 4.

Onboard re-gasification would be accomplished by warming the LNG until it turned into a gas, a process employing an "open loop" system, "closed loop" system, or a combination of the two. In the open loop mode, warm seawater would be drawn into the EPEBV, then passed through a shell and loop vaporizer, converting the LNG to a gaseous state by heating it, and then

---

<sup>1</sup> The proposed STS would be a special purpose buoy equipped with a flexible riser and pipeline manifold and would be affixed to the seabed by chains and anchors. When not in use, it would be submerged, but marked by a smaller lighted buoy on the surface.

would be discharged back to the sea at a reduced temperature. In the closed loop mode, steam from the EPEBV's boilers would be used to heat water circulated through the shell and loop vaporizer in a closed system from which there would be no warming water discharge. El Paso would normally use the open loop system at its proposed Gulf of Mexico facility, but could rely on the closed loop system if necessary. After re-gasification, the natural gas would be conveyed through the buoy, riser, and manifold to the 1.93 mile pipeline leading to the metering platform.

In its letter of March 28, 2003, EPA explained its views on how the CWA would apply to the discharges from the open loop re-gasification system as well as discharges from the metering platform. It also explained its views on how the CAA would apply to emissions associated with both the re-gasification processes and emissions from the metering platform. El Paso objects to regulation of any discharges or emissions originating on the EPEBVs and to the process for authorizing discharges and emissions from the metering platform.

### **SOURCE OF EPA AUTHORITY TO REGULATE ACTIVITIES ASSOCIATED WITH DEEPWATER PORTS**

EPA regards a provision of the DPA, 33 U.S.C. § 1501, *et seq.*, as the primary source of its authority to apply the CAA and CWA to activities associated with deepwater ports. In relevant part, 33 U.S.C. § 1518(a)(1) extends the Constitution and laws of the United States “to deepwater ports . . . and to activities connected, associated, or potentially interfering with the use or operation of any such port, in the same manner as if such port were an area of exclusive Federal jurisdiction located within a State.” In addition, 33 U.S.C. § 1518(b) “federalizes” consistent laws of the adjacent state and directs that they be applied by federal officials. These statutory provisions are similar to Section 4 of the Outer Continental Shelf Lands Act (OCSLA), 43 U.S.C. § 1333(a)(1), and serve the same general purpose, i.e., defining the body of law that applies to activities within the purview of the respective acts. *See generally, e.g., Rodrigue v. Aetna Casualty & Surety Co.*, 395 U.S. 352 (1969); *Wentz v. Kerr-McGee Corp.*, 784 F.2d 699 (5<sup>th</sup> Cir. 1986); *Village of False Pass v. Clark*, 733 F.2d 605 (9<sup>th</sup> Cir. 1984). OCSLA § 4 has been long viewed by EPA as the source of its authority to regulate discharges from oil and gas operations on the outer continental shelf. *See* “Outer Continental Shelf Applicability of FWPCA,” Opinion of the General Counsel (August 3, 1973), *published at* 2 Gen. Couns. Ops. (Water Pollution) 181, 182 (Environmental Law Publishing Service, 1979).

El Paso contends, however, that the DPA establishes a “one window” licensing process that shifts responsibility for issuing authorizations required by the CWA and CAA from EPA to the Secretary of Transportation. According to El Paso, EPA’s role in that unified licensing process is limited to developing conditions implementing those statutes for inclusion in the deepwater port license issued by the Secretary. El Paso further argues that this unified licensing procedure has substantive consequences. According to El Paso, the Secretary’s authority to regulate *via* this unified license is circumscribed by the exclusion of “vessels” in the DPA’s definition of “deepwater port” and EPA could thus neither recommend nor require the Secretary’s imposition of license conditions on vessels, regardless of whether the CWA and CAA authorize EPA to impose such conditions in independent permits. Under that view, only

discharges and emissions from the metering platform would be subject to federal regulation.

EPA is informed, however, that the Secretary of Transportation interprets the DPA as requiring a unified application for all necessary federal permits and close coordination between responsible federal agencies, but not as requiring issuance of a single permit. “Federal Agencies with permit responsibilities such as the EPA and MMS will retain all distinct permit issuance authority.” USCG Memorandum, “Environmental Planning Aspects of the Deepwater Port Act” (1 April 2003).<sup>2</sup> Because the Secretary has primary responsibility for administration of the DPA, EPA defers to that interpretation and does not address the merits of El Paso’s argument. Nor does EPA address the merits of El Paso’s argument on the scope of the DPA’s vessel exclusion.<sup>3</sup>

## INTERNATIONAL LAW

El Paso argues that EPA must interpret the grant of authority under 33 U.S.C. § 1518 in view of constraints imposed by international law, primarily the 1982 United Nations Convention on the Law of the Sea (UNCLOS), which generally prohibits nations from exercising sovereignty over vessels on the high seas.<sup>4</sup> EPA’s interpretation is fully consistent with international law, however, as reflected in UNCLOS.

The United States has not acceded to UNCLOS, but it has been U.S. policy since 1983 to act in a manner consistent with the Convention’s provisions regarding traditional uses of the ocean. Nothing in UNCLOS III and no general principle of international law, however, limits a nation’s sovereignty over its own ports and internal waters, including the authority to impose conditions for entry. *See, e.g., Nevada v. Hall*, 440 U.S. 410 (1979); *United States v. Royal Caribbean Cruises, Ltd.*, 11 F. Supp. 2d 1358 (S.D. Fla. 1998). Assuming that the relevant UNCLOS provisions reflect customary international law and that EPA must interpret §1518 consistently with those provisions, the potential EPA requirements at issue are fully consistent with UNCLOS. Article 60 of UNCLOS explicitly recognizes that coastal States, in their exclusive economic zones (EEZs), “have the exclusive right to construct and to authorize and regulate the construction, operation, and use of . . . installations and structures for the purposes

---

<sup>2</sup> Under transition provisions of the Homeland Security Act, the United States Coast Guard remains responsible for processing El Paso’s license application, despite its transfer to the recently created Department of Homeland Security. In this context, Coast Guard interpretations of the DPA are attributable to the Secretary of Transportation, who retains ultimate authority for issuance or denial of El Paso’s deepwater port license.

<sup>3</sup> The DPA defines “vessel” as “every description of watercraft or other artificial contrivance used as a means of transportation on or through the water.” 15 U.S.C. §1506(19).

<sup>4</sup> In addition, El Paso notes the DPA licensing prerequisite that “the deepwater port . . . not unreasonably interfere with international navigation or other reasonable uses of the high seas, as defined by treaty, convention, or customary international law.” 33 U.S.C. § 1503(c)(4).

provided for in article 56 [pertaining to the EEZ] and other economic purposes.” Deepwater ports fall within this provision.

Moreover, EPA’s regulation of discharges and emissions associated with onboard re-gasification performed by ships that are physically attached to El Paso’s submerged turret system in no way interferes with the freedom of navigation. There is thus no need for EPA to interpret its authority under the DPA restrictively in order to maintain consistency with international law.

To the extent you contend the re-gasification operations occur on the “high seas” rather than at ports over which the United States is sovereign, your argument appears directed at the authority of Congress to extend U.S. sovereignty to the area in which you propose to locate a deepwater port. EPA notes that Congress was aware of constraints imposed by international law when it enacted the DPA in 1974. It decided that, under the 1958 United Nations Convention on the High Seas, Article 2, “a nation might properly execute jurisdiction on the High Seas in order to license and regulate such [deepwater port] facilities.” Senate Report 93-1217, 1974 U.S. Code Congressional and Administrative News 7529, 7536. Of course, UNCLOS further clarifies the authority of a coastal state to establish a deepwater port in its EEZ.

In support of its international law argument, El Paso also relies on Annex VI to the International Convention for the Prevention of Pollution from Ships (MARPOL). However, El Paso’s arguments related to Annex VI are without merit. First, as El Paso acknowledges, Annex VI is not in force and has not yet been ratified by the United States. Second, El Paso claims that regulating emissions of vessels, as proposed by EPA here, “would undermine the international uniformity sought in MARPOL Annex VI,” and alleges that EPA has reaffirmed its “deference to emerging international standards” in a recent rulemaking setting standards for Category 3 marine diesel engines. June 16 Cathey letter at 5 (citing 68 Fed. Reg. 9746, at 9759 (Feb. 28, 2003)). But, although EPA endeavors, where possible, to work within international standards, EPA did not “reaffirm[] its deference to emerging international standards” in that rulemaking. The text in question explains EPA’s decision to not exercise its discretion to apply the standards contained in that rulemaking to marine diesel engines installed on foreign flag vessels. One of the reasons for that decision was “to facilitate the development of more stringent consensus international requirements” that have the potential of maximizing emission reductions from all vessels that visit U.S. ports. At the same time, EPA clearly noted that it would reconsider this issue in a future rulemaking. In addition, Annex VI does not address air emissions from re-gasification activities. Nor does MARPOL preclude Parties from imposing more stringent conditions on ships entering their ports. Again, EPA does not intend to impose any requirement on vessels exercising their navigational rights on the high seas, but is instead addressing activities conducted at the port. As earlier stated, this regulatory approach is consistent with Article 60 of UNCLOS, which gives “exclusive jurisdiction over . . . artificial islands, installations and structures” in the EEZ to coastal states.



## CWA REGULATION OF VESSEL DISCHARGES

CWA § 502(12)(B), 33 U.S.C. § 1362(12), excludes addition of a pollutant from “a vessel or other floating craft” to the ocean or contiguous zone from its definition of “discharge of a pollutant.” Based on that statutory exclusion, El Paso argues the CWA provides EPA no authority to regulate discharges from the EPEBVs. Under the 33 U.S.C. § 1518(a)(1), however, discharges from the EPEBVs must be regulated “as if” they occurred “in an area of exclusive Federal jurisdiction located within a State,” i.e., in the territorial seas or inland waters. 33 U.S.C. § 1518(a)(1). The statutory exclusion for vessel discharges to the contiguous zone and ocean would not thus apply.

EPA has, however, promulgated a regulatory exclusion for vessel discharges that applies to the territorial seas and inland waters as well as to the contiguous zone and ocean. 40 C.F.R. §122.3 provides in pertinent part:

The following discharges do not require NPDES permits:

(a) any discharge of sewage from vessels, effluent from properly functioning marine engines, laundry, shower, and galley sink wastes, or any other discharge incidental to the normal operation of a vessel. This exclusion does not apply to rubbish, trash, garbage, or other such materials discharged overboard; nor to other discharges when the vessel is operating in a capacity other than as a means of transportation such as when used as an energy or mining facility, a storage facility or a seafood processing facility, or when secured to the bed of the ocean, contiguous zone or waters of the United States for the purpose of mineral or oil exploration or development . . . .

The first sentence of this regulation describes the fundamental ambit of the exclusion and the second sentence serves two purposes. The second sentence first clarifies that refuse discharged overboard is not excluded from NPDES permit requirements as “discharges incidental to the normal operation of a vessel.” Second, it serves as a “recapture clause” for incidental discharges that might otherwise be subject to the exclusion of the first sentence “when the vessel is operating in a capacity other than as a means of transportation.” This recapture provision is based on long-standing interpretations that Congress intended to exclude only “vessels or other floating craft” engaged in transportation from CWA permit requirements and that discharges from vessels operating other than as a means of transportation should be regulated under CWA § 402.

El Paso contends the re-gasification process that it would perform aboard EPEBVs is part of those vessels’ transportation function, arguing that “[t]he Port [sic], while producing some wastewater pursuant to re-gasification operations, is only conducting those operations in furtherance of its sole purpose – the transportation of natural gas.” August 18, 2003, Dutton Letter, pp. 8-9. On this basis El Paso distinguishes the EPEBVs from the seafood processing and drill ships the regulation’s recapture provision references as examples, because the primary use of such vessels is not transportation, i.e., they only move to reach the locations in which they will

operate in a non-transportation capacity.

There is no need to reach the question of how the recapture provision of the regulation might apply because the warming water discharges from the LNG re-gasification process that EPA would regulate under the port's NPDES permit are not "incidental to the normal operation of a vessel." LNG re-gasification is an industrial process that does not occur as part of the normal operation of a vessel. It is instead an industrial process normally performed at fixed facilities, e.g., onshore terminals, not on vessels delivering the LNG. Moreover, the proposed Port Pelican and Port Cabrillo, subjects of the only other deepwater port applications now pending, would use gravity-based fixed structures on which the LNG would be re-gasified after its delivery. At those facilities, discharges associated with re-gasification would be regulated in the facilities' NPDES permits.

Re-gasification would not even be "incidental to the normal operation" of the EPEBVs themselves. Re-gasification would not occur while the LNG is loaded aboard those vessels nor during their transit of ocean waters. Onboard re-gasification would also not occur should an EPEBV ever offload its cargo at any LNG terminal other than El Paso's. Indeed, the vessel's crew, although it would be fully qualified to transport LNG *via* steam powered vessels to any LNG terminal in the world, would only be allowed to operate the re-gasification system under the direct supervision of El Paso's PIC. Despite its physical location aboard the EPEBVs, the re-gasification process that would occur at this port would be part of El Paso's industrial operation, not part of the vessels' transportation operation. The warming water discharges from this port process should thus be regulated under an NPDES permit in the same fashion as warming water discharges from the same process at competing LNG terminals.

### **CAA REGULATION OF VESSEL EMISSIONS**

El Paso has acknowledged that sources on the port metering platform will produce air emissions of an estimated 9.48 tons per year of NO<sub>x</sub>, 0.07 tons per year of SO<sub>2</sub>, and 0.73 tons per year of PM<sub>10</sub>. These emissions should be included in the applicability determinations for CAA preconstruction and operating permits. In addition, the much greater vessel emissions associated with the re-gasification process and the transfer of gas to the port should be included. Information submitted by El Paso indicates that these emissions may be as much as 1090 tons per year of NO<sub>x</sub>.<sup>5</sup> A detailed explanation of our position and a response to your various comments follows.

### **Fuel Conversion Facility**

---

<sup>5</sup>This figure is derived from El Paso's air permit application, which apparently includes "hotelling" emissions along with re-gasification emissions, and should therefore be viewed as an upper boundary rather than a precise estimate of emissions associated with re-gasification and transfer of gas to the port.

First, in response to your concerns regarding the potential treatment of the port as a “fuel conversion facility,” I am attaching a memorandum from EPA’s Office of Air Quality Planning and Standards addressing this question. *See* Attachment A, Memorandum from Racqueline Shelton to Guy Donaldson (July 31, 2003). Based on this memorandum and on our current understanding of the nature of the LNG vaporization process at the port, we do not intend to treat the port as a “fuel conversion plant” for new source review (NSR) purposes.

### **Indirect Source Review**

El Paso further asserts that EPA’s view that it has permitting jurisdiction over the port “appears to be based on vessels being attracted by the Port, thus making the Port an indirect source of emissions,” and that asserting jurisdiction on that basis constitutes a prohibited federally-imposed “indirect source review” program under Section 110(a)(5) of the CAA. June 16, 2003, Cathey letter, p. 8. This argument relies on a faulty premise. EPA is not considering the port’s potential to attract mobile sources, but is instead examining the activities directly associated with the port and conducted as a part of its operations. This approach is consistent with the CAA:

it is assuredly not the case that the ban on indirect source review was intended to go so far as to prohibit the attribution to a stationary source of all emissions which happen to emanate from or even merely physically contact a mobile source. Indeed, the statute itself provides that “direct emissions sources or facilities at, within, or associated with, any indirect source shall not be deemed indirect sources for the purpose of this [ban on indirect source review].”

*Natural Resources Defense Council, Inc. v. EPA*, 725 F.2d 761, 771 (D.C. Cir. 1984) (NRDC) (quoting 42 U.S.C. § 7410(a) (5) (C)). All emissions being considered are direct emissions, and are from stationary sources as defined under Section 302(z) of the Act, as further discussed below.<sup>6</sup>

### **“Stationary Sources” Under the CAA**

El Paso maintains that EPA air permitting programs generally cover only stationary sources, and that the CAA defines all vessel emissions as mobile emissions sources. We agree with the first conclusion, but not the second.

Our determination that vessel emissions generated in handling LNG at the port should be included in the applicability determination stems from our reading of the plain language of the CAA. Specifically, its definition of “stationary source” gives EPA the authority to consider emissions from external combustion engine vessels in preconstruction and operating permits. This

---

<sup>6</sup>We also note that the CAA’s requirement is that EPA not mandate inclusion of an indirect source review program in a State Implementation Plan (SIP) or include it in a Federal Implementation Plan (FIP). CAA Section 110(a)(5)(A), 42 U.S.C. § 7410. EPA’s review of the port for permitting purposes is not equivalent to action on a SIP or FIP.

general definition, which is applicable to both preconstruction permits and operating permits, appears at Section 302(z):

Stationary Source. The term “stationary source” means generally any source of an air pollutant except those emissions resulting directly from an internal combustion engine for transportation purposes or from a nonroad engine or nonroad vehicle as defined in section 216.

42 U.S.C. § 7602(z). In turn, the Section 216 definitions of “nonroad engine” and “nonroad vehicle” are limited to internal combustion engines. 42 U.S.C. § 7550(10), (11). Thus, a vessel powered by external combustion engines would be a “stationary source” for permitting purposes, because only internal-combustion-driven vehicles are excluded from the Section 302(z) definition of stationary source.<sup>7</sup>

El Paso disagrees with this approach, saying that EPA’s “rigid” reading of the plain language of the statute would lead to the “illogical result” of treating internal and external combustion engines differently. “A more sensible reading of the CAA,” El Paso contends, “is to exempt from permitting the emissions from all nonroad engines and also engines used for propulsion.” July 18 Dutton Letter, p. 1. Such an exemption, however, is not present in the CAA. Whether Congress could have used a different approach when it wrote the CAA is not relevant to EPA’s decision here, given the plain words of the statute. It is not EPA that has decided to treat external and internal combustion engines differently for purposes of determining what is a stationary source under the CAA. It is instead the express language enacted by Congress.<sup>8</sup>

However, we believe that these statutory definitions do not require EPA to include “to and fro” emissions from marine vessels powered by external combustion engines, or the vessels’ “hotelling” emissions not directly associated with the activities of the port as part of the emissions attributable to the port facility. We draw this distinction because under the DPA other U.S. laws apply “to deepwater ports . . . and to activities connected, associated, or potentially interfering with the use or operation of any such port.” 33 U.S.C. § 1518(a)(1). The “to and fro” emissions and “hotelling” emissions from the vessels are associated with the normal seagoing activities of the

---

<sup>7</sup>As you have informed us, the vessels used in this operation are powered by external combustion engines, not reciprocating internal combustion engines or gas turbines, which generally combust internally. Also, these engines are distinguished from any auxiliary engines on the vessel that may be internal combustion engines.

<sup>8</sup>Whether the Act as a whole would authorize similar treatment of internal-combustion-propelled vessels is not relevant. In this letter we take no position on the applicability of NSR or Title V to emissions from vessels propelled by internal combustion engines. We simply find that the plain language of the Clean Air Act directs that, when making NSR and Title V applicability determinations, EPA is to consider the re-gasification-related emissions from vessels calling at the port.

vessels and not with the industrial activities associated with the port. We thus intend to consider only the emissions from activities in support of the port's function – i.e., those related to processing and transferring gas at the port, regardless of whether they occur on the metering platform or on marine vessels propelled by external combustion engines, as stationary emissions of the port for CAA Title I and Title V purposes. The nature of controls, if any, EPA will propose to impose on those emissions will be reflected in a draft preconstruction/Title V permit.

### **EPA PSD Regulations and the *NRDC* Decision**

El Paso argues that EPA regulations bar consideration of vessel emissions in CAA permitting applicability determinations. July 18 Dutton Letter, p. 3 (citing 40 C.F.R. §§ 51.166(b)(6); 52.21(b)(6)). The cited EPA regulations indeed exclude “the activities of any vessel” from the scope of a regulated stationary source in PSD permitting. EPA promulgated that exemption in 1982, in a rule withdrawing previous regulations that had provided for consideration of vessel emissions on a “control and proximity” basis. See 47 Fed. Reg. 27554 (July 25, 1982). The 1982 rulemaking amended various regulations, including the two cited by El Paso,<sup>9</sup> by adding the phrase “except the activities of any vessel.” In the *NRDC* decision, however, the D.C. Circuit Court of Appeals unambiguously vacated the provisions on which El Paso relies:

[W]e vacate that portion of EPA's revocation [i.e., its 1982 rule withdrawing the previous rules] which “excepts the activities of any vessel” from the emissions attributable to marine terminals, *see, e.g.*, 40 C.F.R. § 51.24(b)(6) (1983), 47 Fed. Reg. 27,560 (1982).

*NRDC*, 725 F.2d at 775. El Paso correctly notes that the Court also remanded the matter to EPA for further action consistent with its opinion. Nonetheless, the *vacatur* leaves no legally effective regulation that would exempt “the activities of any vessel” from consideration for port permitting purposes. *See Action on Smoking and Health v. Civil Aeronautics Board*, 713 F.2d 795, 797 (“To ‘vacate’ . . . means ‘to annul; to cancel or rescind; to declare, to make, or to render, void; to defeat; to deprive of force; to make of no authority or validity; to set aside.’”) El Paso therefore cannot rely on the language added to the regulations by the 1982 rulemaking.

El Paso also asserts that even under EPA's 1980 “control and proximity” regulations, which were withdrawn by the 1982 rule partly vacated in *NRDC*, EPA could still not consider any vessel emissions in permitting the port. Without assessing the merits of El Paso's interpretation of those regulations, we note that the *NRDC* court did not re-promulgate them. Accordingly, the statute rather than these regulations governs our decision here. Our conclusion is reinforced by the fact that the definition of stationary source was added in 1990, after both the rules and the D.C. Circuit opinion had been written. Therefore, nothing in the statute supports the conclusion that re-gasification of LNG occurring at a fixed location using power generated by an external

---

<sup>9</sup>40 C.F.R. § 51.24, which is referenced in the 1983 rulemaking partially vacated in *NRDC*, has since been renumbered as 40 C.F.R. § 166. *See* 51 Fed. Reg. 40656 (Nov. 7, 1986).

combustion engine must be regulated as a mobile source, even when the re-gasification process occurs on a vessel used to transport the LNG and re-gasification equipment to that fixed location.

## **CONCLUSION**

As explained above, EPA Region 6 concludes that:

(1) All discharges from the metering platform and discharges of warming water from the re-gasification process performed aboard EPEBVs are subject to regulation under CWA §402.

(2) Emissions related to the re-gasification and transfer of gas at the port will be included in the CAA operating and preconstruction permit applicability determinations without regard to whether those emissions originate on the metering platforms or EPEBVs. The PSD/Title V permit applications El Paso submitted on September 4, 2003, provide a “worst case” estimate of El Paso’s potential to emit. Regional technical staff will be contacting El Paso representatives to discuss potential terms of the draft preconstruction and operating permit.

EPA recognizes and appreciates that El Paso has different views on these matters. Nothing in this letter, however, precludes El Paso from acting on its own interpretation of applicable laws and regulations. The views explained in this letter, if and when applied in a permit, would be subject to administrative review by EPA’s Environmental Appeals Board. This letter, therefore, does not constitute “final agency action” for purposes of obtaining judicial review. Final agency action occurs upon completion of the permit appeal processes.

Thank you for your patience in this matter. The views of both El Paso and EPA on these difficult issues of first impression have changed substantially since you originally raised them in May, and substantial time was necessary to provide El Paso full opportunity to express its views and to coordinate this response with various affected programs in EPA and other federal agencies. I assure you that EPA Region 6 will give fair and timely consideration to El Paso’s permit applications.

Sincerely yours,

Charles J. Sheehan  
Regional Counsel

Enclosure

cc: Commander Mark Prescott  
United States Coast Guard

Mailing Address:  
P.O. Box 650  
Jackson, Mississippi 39205  
Telephone: (601) 965-1900  
Facsimile: (601) 965-1901



KEITH W. TURNER  
DIRECT DIAL: (601) 965-1958  
E-MAIL ADDRESS:  
kturner@watkinseager.com

November 5, 2018

**Via Email and Hand Delivery**

Tim Aultman  
Environmental Compliance & Enforcement Division  
Mississippi Department of Environmental Quality  
515 East Amite Street  
Jackson, Mississippi 39201

Re: Amite BioEnergy, LLC

Dear Mr. Aultman:

I am writing this as legal counsel for Amite BioEnergy, LLC ("Amite"). Pursuant to Miss. Code Ann. § 49-17-43(7)(g), Amite is voluntarily disclosing information that indicates its facility (Air Pollution Control Permit To Construct Air Emissions Equipment, Permit No. 0080-00031) located in Gloster, Mississippi, may not be in full compliance with 11 Miss. Admin. Code Part 2 Chapter 2, Permit Regulations for the Construction and/or Operation of Air Emissions Equipment, and Chapter 5, Regulations for the Prevention of Significant Deterioration of Air Quality.

The basis for this notice is information identified during work at a sister facility which indicated different emission rates than expected. The actual conditions at the Gloster facility have not yet been determined but ongoing testing will be available in the near term. This will include Volatile Organic Compound EPA Method 25a and Fourier Transform Infrared Spectroscopy EPA Method 320 testing. Upon completion of the testing, Amite will supplement this notice and schedule a meeting with Mississippi Department of Environmental Quality ("MDEQ") staff to review the findings and determine an appropriate path forward. In the meantime, if you need additional information or have questions about this notice please call my office at the number listed above. We appreciate your assistance going forward as Amite addresses this matter and look forward to working with the MDEQ on a satisfactory resolution.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Keith W. Turner", is written over the typed name.

Keith W. Turner

KWT:sd

cc: Gretchen Zmitrovich (via email and hand delivery)  
Krystal Rudolph (via email and hand delivery)  
Todd Tolkinen (via email)  
Michael Bellow (via email)  
Sharon Killian (via email)

RECEIVED

NOV 07 2018





One Galleria Boulevard | Suite 1030 | Metairie, LA 70001 | P (504) 828-5845

trinityconsultants.com

Trinity  
Consultants

February 22, 2019

Mr. Thomas Tynes  
Enforcement Branch Manager  
Mississippi Department of Environmental Quality (MDEQ)  
515 E. Amite Street  
Jackson, MS 39201

**RE: Submittal of Stack Test Report  
Amite BioEnergy LLC; Gloster, MS  
AI #57796**

Dear Mr. Tynes,

On behalf of Amite BioEnergy LLC (Amite), a company owned by Drax Biomass Inc., Trinity Consultants, Inc. (Trinity) submits the attached stack test report for testing performed at Amite on November 26-30, 2018. The testing was performed by Sanders Engineering & Analytical Services, Inc.

Also included as an attachment is a summary of tables of the tested emissions from each source. The Primary Hammermills, the Secondary Hammermills, the Pellet Coolers, the Loadout Silo, and the Regenerative Thermal Oxidizer (RTO) were all tested for VOCs. Additionally, the RTO was also tested for formaldehyde.

Below is a summary of the emissions from each source.

RECEIVED

FEB 28 2019

Dept. of Environmental Quality



### Amite BioEnergy – Emissions from Stack Test

| Equipment                                                  | Average<br>Volatile Organic<br>Compound<br>Emissions <sup>1</sup><br>(tons/yr) | Average<br>Formaldehyde<br>Emissions<br>(tons/yr) <sup>1</sup> |
|------------------------------------------------------------|--------------------------------------------------------------------------------|----------------------------------------------------------------|
| Primary Hammermill 1A (AA-004)                             | 11.21                                                                          | N/A                                                            |
| Primary Hammermill 1B (AA-004)                             | 18.73                                                                          | N/A                                                            |
| Primary Hammermill 2A (AA-004)                             | 36.51                                                                          | N/A                                                            |
| Primary Hammermill 2B (AA-004)                             | 23.17                                                                          | N/A                                                            |
| Primary Hammermill 3A (AA-004)                             | 16.33                                                                          | N/A                                                            |
| Primary Hammermill 3B (AA-004)                             | 11.95                                                                          | N/A                                                            |
| Secondary Hammermill 1 (AA-007)                            | 31.0                                                                           | N/A                                                            |
| Secondary Hammermill 2 (AA-007)                            | 29.5                                                                           | N/A                                                            |
| Secondary Hammermill 3 (AA-007)                            | 30.9                                                                           | N/A                                                            |
| Cooler 1AB                                                 | 91.0                                                                           | N/A                                                            |
| Cooler 1CD                                                 | 77.9                                                                           | N/A                                                            |
| Cooler 2AB                                                 | 82.9                                                                           | N/A                                                            |
| Cooler 2CD                                                 | 88.2                                                                           | N/A                                                            |
| Cooler 3AB                                                 | 84.7                                                                           | N/A                                                            |
| Cooler 3CD                                                 | 74.0                                                                           | N/A                                                            |
| Loadout Silo                                               | 7.74                                                                           | N/A                                                            |
| RTO                                                        | 79.87                                                                          | 2.44                                                           |
| <b>Total</b>                                               | <b>795.58</b>                                                                  | <b>2.44</b>                                                    |
| <i>(1) Emissions are the average of three 1-hour runs.</i> |                                                                                |                                                                |

If you have any questions about the attached report, please call either me at (504) 828-5845, ext 1001, or  
                    .

Sincerely,

TRINITY CONSULTANTS

A handwritten signature in cursive script, appearing to read "Sharon Killian".

Sharon Killian  
Principal Consultant  
Manager of Consulting Services - New Orleans

Attachments

**Summary of Average Volatile Organic Compound (VOC) and Average Formaldehyde Emissions Test Results**  
**Amite BioEnergy LLC**  
**Testing Conducted: November 26-30, 2018**

| Equipment                       | Average<br>Volatile Organic<br>Compound Emissions<br>(lbs/hr) | Average<br>Volatile Organic<br>Compound Emissions<br>(tons/yr) | Average<br>Formaldehyde<br>Emissions<br>(lbs/hr) | Average<br>Formaldehyde<br>Emissions<br>(tons/yr) |
|---------------------------------|---------------------------------------------------------------|----------------------------------------------------------------|--------------------------------------------------|---------------------------------------------------|
| Primary Hammermill 1A (AA-004)  | 2.56                                                          | 11.21                                                          | -                                                | -                                                 |
| Primary Hammermill 1B (AA-004)  | 4.28                                                          | 18.73                                                          | -                                                | -                                                 |
| Primary Hammermill 2A (AA-004)  | 8.34                                                          | 36.51                                                          | -                                                | -                                                 |
| Primary Hammermill 2B (AA-004)  | 5.29                                                          | 23.17                                                          | -                                                | -                                                 |
| Primary Hammermill 3A (AA-004)  | 3.73                                                          | 16.33                                                          | -                                                | -                                                 |
| Primary Hammermill 3B (AA-004)  | 2.73                                                          | 11.95                                                          | -                                                | -                                                 |
| Secondary Hammermill 1 (AA-007) | 7.07                                                          | 31.0                                                           | -                                                | -                                                 |
| Secondary Hammermill 2 (AA-007) | 6.74                                                          | 29.5                                                           | -                                                | -                                                 |
| Secondary Hammermill 3 (AA-007) | 7.06                                                          | 30.9                                                           | -                                                | -                                                 |
| Cooler 1AB                      | 20.78                                                         | 91.0                                                           | -                                                | -                                                 |
| Cooler 1CD                      | 17.78                                                         | 77.9                                                           | -                                                | -                                                 |
| Cooler 2AB                      | 18.93                                                         | 82.9                                                           | -                                                | -                                                 |
| Cooler 2CD                      | 20.14                                                         | 88.2                                                           | -                                                | -                                                 |
| Cooler 3AB                      | 19.33                                                         | 84.7                                                           | -                                                | -                                                 |
| Cooler 3CD                      | 16.90                                                         | 74.0                                                           | -                                                | -                                                 |
| Loadout Silo                    | 1.77                                                          | 7.74                                                           | -                                                | -                                                 |
| RTO                             | 18.24                                                         | 79.87                                                          | 0.55754                                          | 2.44                                              |
| <b>Total</b>                    | <b>181.64</b>                                                 | <b>795.58</b>                                                  | <b>0.55754</b>                                   | <b>2.44</b>                                       |

**Summary of Volatile Organic Compound (VOC) and Formaldehyde Emissions Test Results**  
**Amite BioEnergy LLC**  
**Testing Conducted: November 26-30, 2018**

| Equipment                          | Test Run | Start Time<br>(Military) | Stop Time<br>(Military) | Stack Gas Flow Rate<br>(standard wet<br>ft <sup>3</sup> /minute) | Water Vapor in<br>Stack Gas (percent) | Volatile Organic<br>Compound Emissions<br>(as propane, ppm-<br>wet) | Volatile Organic<br>Compound<br>Emissions<br>(lbs/hr) | Volatile Organic<br>Compound<br>Emissions<br>(tons/yr) |
|------------------------------------|----------|--------------------------|-------------------------|------------------------------------------------------------------|---------------------------------------|---------------------------------------------------------------------|-------------------------------------------------------|--------------------------------------------------------|
| Primary Hammermill 1A<br>(AA-004)  | RUN 1    | 14:20                    | 15:20                   | 8,809                                                            | -                                     | 42.8                                                                | 2.59                                                  | 11.36                                                  |
|                                    | RUN 2    | 15:28                    | 16:28                   | 8,901                                                            | -                                     | 38.7                                                                | 2.37                                                  | 10.37                                                  |
|                                    | RUN 3    | 16:37                    | 17:37                   | 8,716                                                            | -                                     | 45.3                                                                | 2.72                                                  | 11.90                                                  |
|                                    | Average  |                          |                         | 8,809                                                            | -                                     | 42.3                                                                | 2.56                                                  | 11.21                                                  |
| Primary Hammermill 1B<br>(AA-004)  | RUN 1    | 14:20                    | 15:20                   | 9,529                                                            | -                                     | 62.0                                                                | 4.06                                                  | 17.79                                                  |
|                                    | RUN 2    | 15:28                    | 16:28                   | 9,507                                                            | -                                     | 61.9                                                                | 4.04                                                  | 17.72                                                  |
|                                    | RUN 3    | 16:37                    | 17:37                   | 9,416                                                            | -                                     | 73.0                                                                | 4.72                                                  | 20.70                                                  |
|                                    | Average  |                          |                         | 9,484                                                            | -                                     | 65.6                                                                | 4.28                                                  | 18.73                                                  |
| Primary Hammermill 2A<br>(AA-004)  | RUN 1    | 9:35                     | 10:35                   | 8,929                                                            | -                                     | 140.0                                                               | 8.59                                                  | 37.63                                                  |
|                                    | RUN 2    | 11:00                    | 12:00                   | 9,233                                                            | -                                     | 131.4                                                               | 8.34                                                  | 36.51                                                  |
|                                    | RUN 3    | 12:19                    | 13:19                   | 9,593                                                            | -                                     | 122.6                                                               | 8.08                                                  | 35.39                                                  |
|                                    | Average  |                          |                         | 9,252                                                            | -                                     | 131.3                                                               | 8.34                                                  | 36.51                                                  |
| Primary Hammermill 2B<br>(AA-004)  | RUN 1    | 9:35                     | 10:35                   | 6,766                                                            | -                                     | 123.0                                                               | 5.72                                                  | 25.06                                                  |
|                                    | RUN 2    | 11:00                    | 12:00                   | 6,820                                                            | -                                     | 113.3                                                               | 5.31                                                  | 23.26                                                  |
|                                    | RUN 3    | 12:19                    | 13:19                   | 6,758                                                            | -                                     | 104.2                                                               | 4.84                                                  | 21.20                                                  |
|                                    | Average  |                          |                         | 6,781                                                            | -                                     | 113.5                                                               | 5.29                                                  | 23.17                                                  |
| Primary Hammermill 3A<br>(AA-004)  | RUN 1    | 14:13                    | 15:13                   | 8,455                                                            | -                                     | 64.9                                                                | 3.77                                                  | 16.52                                                  |
|                                    | RUN 2    | 15:40                    | 16:40                   | 8,445                                                            | -                                     | 65.8                                                                | 3.82                                                  | 16.72                                                  |
|                                    | RUN 3    | 17:00                    | 18:00                   | 8,538                                                            | -                                     | 61.3                                                                | 3.60                                                  | 15.76                                                  |
|                                    | Average  |                          |                         | 8,479                                                            | -                                     | 64.0                                                                | 3.73                                                  | 16.33                                                  |
| Primary Hammermill 3B<br>(AA-004)  | RUN 1    | 14:13                    | 15:13                   | 8,733                                                            | -                                     | 43.5                                                                | 2.61                                                  | 11.43                                                  |
|                                    | RUN 2    | 15:40                    | 16:40                   | 8,604                                                            | -                                     | 47.2                                                                | 2.79                                                  | 12.23                                                  |
|                                    | RUN 3    | 17:00                    | 18:00                   | 8,636                                                            | -                                     | 46.9                                                                | 2.78                                                  | 12.19                                                  |
|                                    | Average  |                          |                         | 8,658                                                            | -                                     | 45.9                                                                | 2.73                                                  | 11.95                                                  |
| Secondary Hammermill 1<br>(AA-007) | RUN 1    | 9:20                     | 10:20                   | 7,317                                                            | -                                     | 131.5                                                               | 6.6                                                   | 29.0                                                   |
|                                    | RUN 2    | 10:32                    | 11:32                   | 7,291                                                            | -                                     | 141.6                                                               | 7.1                                                   | 31.1                                                   |
|                                    | RUN 3    | 11:48                    | 12:48                   | 7,241                                                            | -                                     | 150.9                                                               | 7.5                                                   | 32.9                                                   |
|                                    | Average  |                          |                         | 7,283                                                            | -                                     | 141.3                                                               | 7.07                                                  | 31.0                                                   |
| Secondary Hammermill 2<br>(AA-007) | RUN 1    | 9:20                     | 10:20                   | 8,824                                                            | -                                     | 115.5                                                               | 7.0                                                   | 30.7                                                   |
|                                    | RUN 2    | 10:32                    | 11:32                   | 8,565                                                            | -                                     | 114.1                                                               | 6.7                                                   | 29.4                                                   |
|                                    | RUN 3    | 11:48                    | 12:48                   | 8,362                                                            | -                                     | 113.1                                                               | 6.5                                                   | 28.5                                                   |
|                                    | Average  |                          |                         | 8,584                                                            | -                                     | 114.2                                                               | 6.74                                                  | 29.5                                                   |
| Secondary Hammermill 3<br>(AA-007) | RUN 1    | 9:20                     | 10:20                   | 10,121                                                           | -                                     | 37.2                                                                | 6.1                                                   | 26.6                                                   |
|                                    | RUN 2    | 10:32                    | 11:32                   | 10,076                                                           | -                                     | 109.8                                                               | 7.6                                                   | 33.3                                                   |
|                                    | RUN 3    | 11:48                    | 12:48                   | 10,182                                                           | -                                     | 107.2                                                               | 7.5                                                   | 32.9                                                   |
|                                    | Average  |                          |                         | 10,126                                                           | -                                     | 101.4                                                               | 7.06                                                  | 30.9                                                   |



**Summary of Volatile Organic Compound (VOC) and Formaldehyde Emissions Test Results**  
**Amite BioEnergy LLC**  
**Testing Conducted: November 26-30, 2018**

| Equipment    | Test Run | Start Time (Military) | Stop Time (Military) | Stack Gas Flow Rate (standard wet ft <sup>3</sup> /minute) | Water Vapor in Stack Gas (percent) | Volatile Organic Compound Emissions (as propane, ppm-wet) | Volatile Organic Compound Emissions (lbs/hr) | Volatile Organic Compound Emissions (tons/yr) |
|--------------|----------|-----------------------|----------------------|------------------------------------------------------------|------------------------------------|-----------------------------------------------------------|----------------------------------------------|-----------------------------------------------|
| Cooler 1AB   | RUN 1    | 7:05                  | 8:05                 | 21,075                                                     | -                                  | 142.8                                                     | 20.7                                         | 90.6                                          |
|              | RUN 2    | 8:12                  | 9:12                 | 21,138                                                     | -                                  | 143.7                                                     | 20.9                                         | 91.5                                          |
|              | RUN 3    | 9:21                  | 10:21                | 21,048                                                     | -                                  | 143.5                                                     | 20.8                                         | 90.9                                          |
|              | Average  |                       |                      | 21,087                                                     | -                                  | 143.4                                                     | 20.78                                        | 91.0                                          |
| Cooler 1CD   | RUN 1    | 11:35                 | 12:57                | 17,644                                                     | -                                  | 156.8                                                     | 19.0                                         | 83.3                                          |
|              | RUN 2    | 13:06                 | 14:06                | 17,683                                                     | -                                  | 137.5                                                     | 16.7                                         | 73.2                                          |
|              | RUN 3    | 14:13                 | 15:13                | 17,816                                                     | -                                  | 143.7                                                     | 17.6                                         | 77.1                                          |
|              | Average  |                       |                      | 17,714                                                     | -                                  | 146.0                                                     | 17.78                                        | 77.9                                          |
| Cooler 2AB   | RUN 1    | 14:26                 | 15:26                | 16,171                                                     | -                                  | 169.9                                                     | 18.9                                         | 82.7                                          |
|              | RUN 2    | 15:31                 | 16:31                | 16,084                                                     | -                                  | 170.1                                                     | 18.8                                         | 82.4                                          |
|              | RUN 3    | 16:38                 | 17:38                | 16,295                                                     | -                                  | 170.6                                                     | 19.1                                         | 83.7                                          |
|              | Average  |                       |                      | 16,183                                                     | -                                  | 170.2                                                     | 18.93                                        | 82.9                                          |
| Cooler 2CD   | RUN 1    | 7:05                  | 8:05                 | 15,953                                                     | -                                  | 191.4                                                     | 21.0                                         | 91.9                                          |
|              | RUN 2    | 8:12                  | 9:12                 | 15,991                                                     | -                                  | 197.3                                                     | 21.7                                         | 95.0                                          |
|              | RUN 3    | 9:21                  | 10:21                | 15,624                                                     | -                                  | 165.2                                                     | 17.7                                         | 77.7                                          |
|              | Average  |                       |                      | 15,856                                                     | -                                  | 184.6                                                     | 20.14                                        | 88.2                                          |
| Cooler 3AB   | RUN 1    | 10:54                 | 11:55                | 17,132                                                     | -                                  | 176.3                                                     | 20.8                                         | 90.9                                          |
|              | RUN 2    | 12:38                 | 13:38                | 17,319                                                     | -                                  | 168.5                                                     | 20.1                                         | 87.9                                          |
|              | RUN 3    | 17:57                 | 18:57                | 17,452                                                     | -                                  | 143.1                                                     | 17.2                                         | 75.2                                          |
|              | Average  |                       |                      | 17,301                                                     | -                                  | 162.6                                                     | 19.33                                        | 84.7                                          |
| Cooler 3CD   | RUN 1    | 15:25                 | 17:35                | 17,262                                                     | -                                  | 142.9                                                     | 17.0                                         | 74.3                                          |
|              | RUN 2    | 17:40                 | 18:40                | 17,177                                                     | -                                  | 140.5                                                     | 16.6                                         | 72.7                                          |
|              | RUN 3    | 18:45                 | 19:45                | 17,158                                                     | -                                  | 145.4                                                     | 17.2                                         | 75.1                                          |
|              | Average  |                       |                      | 17,199                                                     | -                                  | 143.0                                                     | 16.90                                        | 74.0                                          |
| Loadout Silo | RUN 1    | 10:37                 | 11:37                | 45,788                                                     | -                                  | 4.68                                                      | 1.47                                         | 6.45                                          |
|              | RUN 2    | 11:41                 | 12:41                | 46,377                                                     | -                                  | 5.43                                                      | 1.73                                         | 7.58                                          |
|              | RUN 3    | 12:45                 | 13:45                | 46,583                                                     | -                                  | 6.55                                                      | 2.10                                         | 9.18                                          |
|              | Average  |                       |                      | 46,249                                                     | -                                  | 5.55                                                      | 1.77                                         | 7.74                                          |
| RTO          | RUN 1    | 16:24                 | 17:24                | 137,942                                                    | 42.7                               | 26.0                                                      | 24.6                                         | 107.9                                         |
|              | RUN 2    | 17:50                 | 18:50                | 137,936                                                    | 42.7                               | 20.4                                                      | 19.3                                         | 84.5                                          |
|              | RUN 3    | 19:16                 | 20:16                | 139,995                                                    | 41.8                               | 11.2                                                      | 10.8                                         | 47.2                                          |
|              | Average  |                       |                      | 138,624                                                    | 42.4                               | 19.18                                                     | 18.24                                        | 79.87                                         |
| Equipment    | Test Run | Start Time (Military) | Stop Time (Military) | Stack Gas Flow Rate (standard wet ft <sup>3</sup> /minute) | Water Vapor in Stack Gas (percent) | Formaldehyde Emissions (ppm-wet)                          | Formaldehyde Emissions (lbs/hr)              | Formaldehyde Emissions (tons/yr)              |
| RTO          | RUN 1    | 16:24                 | 17:24                | 137,942                                                    | 42.7                               | 1.28                                                      | 0.82623                                      | 3.62                                          |
|              | RUN 2    | 17:50                 | 18:50                | 138,405                                                    | 42.7                               | 0.84                                                      | 0.54403                                      | 2.38                                          |
|              | RUN 3    | 19:16                 | 20:16                | 140,465                                                    | 41.8                               | 0.46                                                      | 0.30236                                      | 1.32                                          |
|              | Average  |                       |                      | 138,937                                                    | 42.4                               | 0.9                                                       | 0.55754                                      | 2.44                                          |

**TABLE V. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**PRIMARY HAMMERMILL 1A**  
**Wednesday, November 28, 2018**

| TEST    | Start<br>Time<br>Military | Stop<br>Time<br>Military | Stack Gas<br>Flow Rate<br>(Standard<br>Wet Cubic<br>Feet per<br>Minute) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(as propane)<br>(ppm-wet) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Lbs/hour) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Tons/Year) |
|---------|---------------------------|--------------------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------|
| RUN 1   | 14:20                     | 15:20                    | 8,809                                                                   | 42.8                                                                       | 2.59                                                        | 11.36                                                        |
| RUN 2   | 15:28                     | 16:28                    | 8,901                                                                   | 38.7                                                                       | 2.37                                                        | 10.37                                                        |
| RUN 3   | 16:37                     | 17:37                    | 8,716                                                                   | 45.3                                                                       | 2.72                                                        | 11.90                                                        |
| Average |                           |                          | 8,809                                                                   | 42.3                                                                       | 2.56                                                        | 11.21                                                        |

**TABLE VI. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**PRIMARY HAMMERMILL 1B**  
**Wednesday, November 28, 2018**

| TEST    | Start<br>Time<br>Military | Stop<br>Time<br>Military | Stack Gas<br>Flow Rate<br>(Standard<br>Wet Cubic<br>Feet per<br>Minute) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(as propane)<br>(ppm-wet) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Lbs/hour) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Tons/Year) |
|---------|---------------------------|--------------------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------|
| RUN 1   | 14:20                     | 15:20                    | 9,529                                                                   | 62.0                                                                       | 4.06                                                        | 17.79                                                        |
| RUN 2   | 15:28                     | 16:28                    | 9,507                                                                   | 61.9                                                                       | 4.04                                                        | 17.72                                                        |
| RUN 3   | 16:37                     | 17:37                    | 9,416                                                                   | 73.0                                                                       | 4.72                                                        | 20.70                                                        |
| Average |                           |                          | 9,484                                                                   | 65.6                                                                       | 4.28                                                        | 18.73                                                        |

**TABLE VII. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**PRIMARY HAMMERMILL 2A**  
**Wednesday, November 28, 2018**

| TEST    | Start<br>Time<br>Military | Stop<br>Time<br>Military | Stack Gas<br>Flow Rate<br>(Standard<br>Wet Cubic<br>Feet per<br>Minute) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(as propane)<br>(ppm-wet) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Lbs/hour) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Tons/Year) |
|---------|---------------------------|--------------------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------|
| RUN 1   | 9:35                      | 10:35                    | 8,929                                                                   | 140.0                                                                      | 8.59                                                        | 37.63                                                        |
| RUN 2   | 11:00                     | 12:00                    | 9,233                                                                   | 131.4                                                                      | 8.34                                                        | 36.51                                                        |
| RUN 3   | 12:19                     | 13:19                    | 9,593                                                                   | 122.6                                                                      | 8.08                                                        | 35.39                                                        |
| Average |                           |                          | 9,252                                                                   | 131.3                                                                      | 8.34                                                        | 36.51                                                        |



**TABLE VIII. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**PRIMARY HAMMERMILL 2B**  
**Wednesday, November 28, 2018**

| TEST    | Start<br>Time<br>Military | Stop<br>Time<br>Military | Stack Gas<br>Flow Rate<br>(Standard<br>Wet Cubic<br>Feet per<br>Minute) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(as propane)<br>(ppm-wet) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Lbs/hour) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Tons/Year) |
|---------|---------------------------|--------------------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------|
| RUN 1   | 9:35                      | 10:35                    | 6,766                                                                   | 123.0                                                                      | 5.72                                                        | 25.06                                                        |
| RUN 2   | 11:00                     | 12:00                    | 6,820                                                                   | 113.3                                                                      | 5.31                                                        | 23.26                                                        |
| RUN 3   | 12:19                     | 13:19                    | 6,758                                                                   | 104.2                                                                      | 4.84                                                        | 21.20                                                        |
| Average |                           |                          | 6,781                                                                   | 113.5                                                                      | 5.29                                                        | 23.17                                                        |

**TABLE I. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY**  
**PRIMARY HAMMERMILL 3A**  
**Monday, November 26, 2018**

| TEST    | Start<br>Time<br>Military | Stop<br>Time<br>Military | Stack Gas<br>Flow Rate<br>(Standard<br>Wet Cubic<br>Feet per<br>Minute) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(as propane)<br>(ppm-wet) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Lbs/hour) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Tons/Year) |
|---------|---------------------------|--------------------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------|
| RUN 1   | 14:13                     | 15:13                    | 8,455                                                                   | 64.9                                                                       | 3.77                                                        | 16.52                                                        |
| RUN 2   | 15:40                     | 16:40                    | 8,445                                                                   | 65.8                                                                       | 3.82                                                        | 16.72                                                        |
| RUN 3   | 17:00                     | 18:00                    | 8,538                                                                   | 61.3                                                                       | 3.60                                                        | 15.76                                                        |
| Average |                           |                          | 8,479                                                                   | 64.0                                                                       | 3.73                                                        | 16.33                                                        |

**TABLE II. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**PRIMARY HAMMERMILL 3B**  
**Monday, November 26, 2018**

| TEST    | Start<br>Time<br>Military | Stop<br>Time<br>Military | Stack Gas<br>Flow Rate<br>(Standard<br>Wet Cubic<br>Feet per<br>Minute) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(as propane)<br>(ppm-wet) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Lbs/hour) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Tons/Year) |
|---------|---------------------------|--------------------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------|
| RUN 1   | 14:13                     | 15:13                    | 8,733                                                                   | 43.5                                                                       | 2.61                                                        | 11.43                                                        |
| RUN 2   | 15:40                     | 16:40                    | 8,604                                                                   | 47.2                                                                       | 2.79                                                        | 12.23                                                        |
| RUN 3   | 17:00                     | 18:00                    | 8,636                                                                   | 46.9                                                                       | 2.78                                                        | 12.19                                                        |
| Average |                           |                          | 8,658                                                                   | 45.9                                                                       | 2.73                                                        | 11.95                                                        |

**TABLE XV. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**SECONDARY HAMMERMILL 1**  
**Friday, November 30, 2018**

| TEST    | Start<br>Time<br>Military | Stop<br>Time<br>Military | Stack Gas<br>Flow Rate<br>(Standard<br>Wet Cubic<br>Feet per<br>Minute) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(as propane)<br>(ppm-wet) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Lbs/hour) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Tons/Year) |
|---------|---------------------------|--------------------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------|
| RUN 1   | 9:20                      | 10:20                    | 7,317                                                                   | 131.5                                                                      | 6.6                                                         | 29.0                                                         |
| RUN 2   | 10:32                     | 11:32                    | 7,291                                                                   | 141.6                                                                      | 7.1                                                         | 31.1                                                         |
| RUN 3   | 11:48                     | 12:48                    | 7,241                                                                   | 150.9                                                                      | 7.5                                                         | 32.9                                                         |
| Average |                           |                          | 7,283                                                                   | 141.3                                                                      | 7.07                                                        | 31.0                                                         |

**TABLE XVI. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**SECONDARY HAMMERMILL 2**  
**Friday, November 30, 2018**

| TEST    | Start<br>Time<br>Military | Stop<br>Time<br>Military | Stack Gas<br>Flow Rate<br>(Standard<br>Wet Cubic<br>Feet per<br>Minute) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(as propane)<br>(ppm-wet) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(lbs/hour) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Tons/Year) |
|---------|---------------------------|--------------------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------|
| RUN 1   | 9:20                      | 10:20                    | 8,824                                                                   | 115.5                                                                      | 7.0                                                         | 30.7                                                         |
| RUN 2   | 10:32                     | 11:32                    | 8,565                                                                   | 114.1                                                                      | 6.7                                                         | 29.4                                                         |
| RUN 3   | 11:48                     | 12:48                    | 8,362                                                                   | 113.1                                                                      | 6.5                                                         | 28.5                                                         |
| Average |                           |                          | 8,584                                                                   | 114.2                                                                      | 6.74                                                        | 29.5                                                         |

**TABLE XVII. SUMMARY OF EMISSIONS TEST RESULTS  
AMITE BIOENERGY LLC  
SECONDARY HAMMERMILL 3  
Friday, November 30, 2018**

| TEST    | Start<br>Time<br>Military | Stop<br>Time<br>Military | Stack Gas<br>Flow Rate<br>(Standard<br>Wet Cubic<br>Feet per<br>Minute) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(as propane)<br>(ppm-wet) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(lbs/hour) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Tons/Year) |
|---------|---------------------------|--------------------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------|
| RUN 1   | 9:20                      | 10:20                    | 10,121                                                                  | 87.2                                                                       | 6.1                                                         | 26.6                                                         |
| RUN 2   | 10:32                     | 11:32                    | 10,076                                                                  | 109.8                                                                      | 7.6                                                         | 33.3                                                         |
| RUN 3   | 11:48                     | 12:48                    | 10,182                                                                  | 107.2                                                                      | 7.5                                                         | 32.9                                                         |
| Average |                           |                          | 10,126                                                                  | 101.4                                                                      | 7.06                                                        | 30.9                                                         |

**TABLE IX. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**COOLER 1AB**  
**Thursday, November 29, 2018**

| TEST    | Start<br>Time<br>Military | Stop<br>Time<br>Military | Stack Gas<br>Flow Rate<br>(Standard<br>Wet Cubic<br>Feet per<br>Minute) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(as propane)<br>(ppm-wet) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Lbs/hour) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Tons/Year) |
|---------|---------------------------|--------------------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------|
| RUN 1   | 7:05                      | 8:05                     | 21,075                                                                  | 142.8                                                                      | 20.7                                                        | 90.6                                                         |
| RUN 2   | 8:12                      | 9:12                     | 21,138                                                                  | 143.7                                                                      | 20.9                                                        | 91.5                                                         |
| RUN 3   | 9:21                      | 10:21                    | 21,048                                                                  | 143.5                                                                      | 20.8                                                        | 90.9                                                         |
| Average |                           |                          | 21,087                                                                  | 143.4                                                                      | 20.78                                                       | 91.0                                                         |

**TABLE XII. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**COOLER 1CD**  
**Thursday, November 29, 2018**

| TEST    | Start<br>Time<br>Military | Stop<br>Time<br>Military | Stack Gas<br>Flow Rate<br>(Standard<br>Wet Cubic<br>Feet per<br>Minute) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(as propane)<br>(ppm-wet) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Lbs/hour) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Tons/Year) |
|---------|---------------------------|--------------------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------|
| RUN 1   | 11:35                     | 12:57                    | 17,644                                                                  | 156.8                                                                      | 19.0                                                        | 83.3                                                         |
| RUN 2   | 13:06                     | 14:06                    | 17,683                                                                  | 137.5                                                                      | 16.7                                                        | 73.2                                                         |
| RUN 3   | 14:13                     | 15:13                    | 17,816                                                                  | 143.7                                                                      | 17.6                                                        | 77.1                                                         |
| Average |                           |                          | 17,714                                                                  | 146.0                                                                      | 17.78                                                       | 77.9                                                         |



**TABLE XIV. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**COOLER 2AB**  
**Thursday, November 29, 2018**

| TEST    | Start<br>Time<br>Military | Stop<br>Time<br>Military | Stack Gas<br>Flow Rate<br>(Standard<br>Wet Cubic<br>Feet per<br>Minute) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(as propane)<br>(ppm-wet) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Lbs/hour) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Tons/Year) |
|---------|---------------------------|--------------------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------|
| RUN 1   | 14:26                     | 15:26                    | 16,171                                                                  | 169.9                                                                      | 18.9                                                        | 82.7                                                         |
| RUN 2   | 15:31                     | 16:31                    | 16,084                                                                  | 170.1                                                                      | 18.8                                                        | 82.4                                                         |
| RUN 3   | 16:38                     | 17:38                    | 16,295                                                                  | 170.6                                                                      | 19.1                                                        | 83.7                                                         |
| Average |                           |                          | 16,183                                                                  | 170.2                                                                      | 18.93                                                       | 82.9                                                         |

**TABLE X. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**COOLER 2CD**  
**Thursday, November 29, 2018**

| TEST    | Start<br>Time<br>Military | Stop<br>Time<br>Military | Stack Gas<br>Flow Rate<br>(Standard<br>Wet Cubic<br>Feet per<br>Minute) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(as propane)<br>(ppm-wet) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Lbs/hour) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Tons/Year) |
|---------|---------------------------|--------------------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------|
| RUN 1   | 7:05                      | 8:05                     | 15,953                                                                  | 191.4                                                                      | 21.0                                                        | 91.9                                                         |
| RUN 2   | 8:12                      | 9:12                     | 15,991                                                                  | 197.3                                                                      | 21.7                                                        | 95.0                                                         |
| RUN 3   | 9:21                      | 10:21                    | 15,624                                                                  | 165.2                                                                      | 17.7                                                        | 77.7                                                         |
| Average |                           |                          | 15,856                                                                  | 184.6                                                                      | 20.14                                                       | 88.2                                                         |

**TABLE XI. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**COOLER 3AB**  
**Thursday, November 29, 2018**

| TEST    | Start<br>Time<br>Military | Stop<br>Time<br>Military | Stack Gas<br>Flow Rate<br>(Standard<br>Wet Cubic<br>Feet per<br>Minute) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(as propane)<br>(ppm-wet) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Lbs/hour) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Tons/Year) |
|---------|---------------------------|--------------------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------|
| RUN 1   | 10:54                     | 11:55                    | 17,132                                                                  | 176.3                                                                      | 29.8                                                        | 90.9                                                         |
| RUN 2   | 12:38                     | 13:38                    | 17,319                                                                  | 168.5                                                                      | 29.1                                                        | 87.9                                                         |
| RUN 3   | 17:57                     | 18:57                    | 17,452                                                                  | 143.1                                                                      | 17.2                                                        | 75.2                                                         |
| Average |                           |                          | 17,301                                                                  | 162.6                                                                      | 19.33                                                       | 84.7                                                         |

**TABLE XIII. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**COOLER 3CD**  
**Thursday, November 29, 2018**

| TEST    | Start Time<br>Military | Stop Time<br>Military | Stack Gas Flow Rate<br>(Standard Wet Cubic Feet per Minute) | Volatile Organic Compounds Emissions<br>(as propane)<br>(ppm-wet) | Volatile Organic Compounds Emissions<br>(Lbs/hour) | Volatile Organic Compounds Emissions<br>(Tons/Year) |
|---------|------------------------|-----------------------|-------------------------------------------------------------|-------------------------------------------------------------------|----------------------------------------------------|-----------------------------------------------------|
| RUN 1   | 15:25                  | 17:35                 | 17,262                                                      | 142.9                                                             | 17.0                                               | 74.3                                                |
| RUN 2   | 17:40                  | 18:40                 | 17,177                                                      | 140.5                                                             | 16.6                                               | 72.7                                                |
| RUN 3   | 18:45                  | 19:45                 | 17,158                                                      | 145.4                                                             | 17.2                                               | 75.1                                                |
| Average |                        |                       | 17,199                                                      | 143.0                                                             | 16.90                                              | 74.0                                                |

**TABLE III. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**LOADOUT SILO**  
**Tuesday, November 27, 2018**

| TEST    | Start<br>Time<br>Military | Stop<br>Time<br>Military | Stack Gas<br>Flow Rate<br>(Standard<br>Wet Cubic<br>Feet per<br>Minute) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(as propane)<br>(ppm-wet) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Lbs/hour) | Volatile<br>Organic<br>Compounds<br>Emissions<br>(Tons/Year) |
|---------|---------------------------|--------------------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------|
| RUN 1   | 10:37                     | 11:37                    | 45,788                                                                  | 4.68                                                                       | 1.47                                                        | 6.45                                                         |
| RUN 2   | 11:41                     | 12:41                    | 46,377                                                                  | 5.43                                                                       | 1.73                                                        | 7.58                                                         |
| RUN 3   | 12:45                     | 13:45                    | 46,583                                                                  | 6.55                                                                       | 2.10                                                        | 9.18                                                         |
| Average |                           |                          | 46,249                                                                  | 5.55                                                                       | 1.77                                                        | 7.74                                                         |

**TABLE IV. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**RTO - VOC EMISSIONS**  
**Monday, November 26, 2018**

| TEST    | Start Time<br>Military | Stop Time<br>Military | Stack Gas Flow Rate<br>(Standard Wet Cubic Feet per Minute) | Water Vapor in Stack Gas<br>(Percent) | Volatile Organic Compounds Emissions<br>(as propane)<br>(ppm-wet) | Volatile Organic Compounds Emissions<br>(Lbs/hour) | Volatile Organic Compounds Emissions<br>(Tons/Year) |
|---------|------------------------|-----------------------|-------------------------------------------------------------|---------------------------------------|-------------------------------------------------------------------|----------------------------------------------------|-----------------------------------------------------|
| RUN 1   | 16:24                  | 17:24                 | 137,942                                                     | 42.7                                  | 26.0                                                              | 24.6                                               | 107.9                                               |
| RUN 2   | 17:50                  | 18:50                 | 137,936                                                     | 42.7                                  | 20.4                                                              | 19.3                                               | 84.5                                                |
| RUN 3   | 19:16                  | 20:16                 | 139,995                                                     | 41.8                                  | 11.2                                                              | 10.8                                               | 47.2                                                |
| Average |                        |                       | 138,624                                                     | 42.4                                  | 19.18                                                             | 18.24                                              | 79.87                                               |

**TABLE XVIII. FORMALDEHYDE EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**RTO - FORMALDEHYDE EMISSIONS**  
**Monday, November 26, 2018**

| TEST    | Start<br>Time<br>Military | Stop<br>Time<br>Military | Stack Gas<br>Flow Rate<br>(Standard<br>Wet Cubic<br>Feet per<br>Minute) | Water<br>Vapor in<br>Stack Gas<br>(Percent) | Formaldehyde<br>Emissions<br>(ppm-wet) | Formaldehyde<br>Emissions<br>(Lbs/hour) | Formaldehyde<br>Emissions<br>(Tons/Year) |
|---------|---------------------------|--------------------------|-------------------------------------------------------------------------|---------------------------------------------|----------------------------------------|-----------------------------------------|------------------------------------------|
| RUN 1   | 16:24                     | 17:24                    | 137,942                                                                 | 42.7                                        | 1.28                                   | 0.82623                                 | 3.62                                     |
| RUN 2   | 17:50                     | 18:50                    | 138,405                                                                 | 42.7                                        | 0.84                                   | 0.54403                                 | 2.38                                     |
| RUN 3   | 19:16                     | 20:16                    | 140,465                                                                 | 41.8                                        | 0.46                                   | 0.30236                                 | 1.32                                     |
| Average |                           |                          | 138,937                                                                 | 42.4                                        | 0.9                                    | 0.55754                                 | 2.44                                     |

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**DATE:** January 20, 1976

**SUBJECT:** Clarification of Sources Subject to Prevention  
of Significant Deterioration (PSD) Review

**FROM:** D. Kent Berry, Director  
Policy Analysis Staff

**TO:** Asa B. Foster, Jr., Director  
Air and Hazardous Materials Division  
Region IV

This is in response to your November 26, 1975, memo to Dr. Steigerwald requesting clarification of the emission points in phosphate rock processing plants and fuel conversion plants that should be subject to PSD review. I understand from discussions with your staff that you are mainly interested in a clarification of the general processes and -operations covered by the PSD review rather than the specific emission points that would normally be associated with each process or facility. As a general policy, all emission points of SO<sub>2</sub> and particulate matter at a facility covered by the PSD review should be considered in determining the air quality impact of the facility. A BACT determination should generally be made for all emission points also, although you have the flexibility not to specify a BACT emission limit for certain emission points if little would be gained.

Fuel conversion plants are defined for purposes of PSD as those plants which accomplish a change in state for a given fossil fuel. The large majority of these plants are likely to accomplish these changes through coal gasification, coal liquefaction, or oil shale processing. The recently promulgated NSPS governing new coal preparation plants regulate most particulate emissions from pre-gasification or liquefaction operations and thereby define BACT for them. NSPS for both SO<sub>2</sub> and PM already exist for the boilers which are necessary in most fuel conversion operations to generate process steam. An SSEIS for coal gasification plants is being drafted with the intent to include the gasification process itself for sulfur and HC emissions in cases where pipeline quality gas would be produced.

We have examined several of the first-generation fuel-conversion processes and can provide, if you need it, more detailed information on specific emission points and typical emission rates as well as the location of a number of proposed plants. Mike Trutna in Jean Schueneman's division should be the contact for additional information in this area, including assistance on BACT determinations (see Jean's memo to you of December 2, 1975).

With respect to phosphate rock processing, the same philosophy stated above should apply: all processes emitting SO<sub>2</sub> and/or particulate matter located on the same premises with phosphate rock preparation operations are subject to PSD review. A list of the processes commonly associated with phosphate rock preparation is presented in Table 1 and shown in Figure 1. If, however, any of the chemical or fertilizer production processes are not associated with the phosphate rock processing operation, we feel there is no basis for their inclusion under the PSD regulation as presently worded. In addition, the particulate impact of these processes meeting NSPS is relatively minor.

In our opinion, the measures required to meet the NSPS fluoride standards for the fertilizer production operations also represent BACT for particulate matter and therefore a separate BACT determination for particulate matter is not necessary. However, some estimate of the particulate emissions is needed to complete the air quality impact analysis and an estimate of these emissions is



presented in Table 1. Further assistance in quantifying the particulate emissions can be provided on a case-by-case basis.

In addition to the process sources, fugitive dust emissions from haul roads, tailings piles etc. may need to be examined with respect to BACT (probably by specifying operating and maintenance practices) and also for their air quality impact (although where the plant covers a large land area, the concentration may have dropped off substantially by the time the plume reaches the plant boundary).

I hope this adequately answers your questions. If you need further assistance or want to discuss our response in more detail, please contact Mike Trutna (8-629-5365) or myself (8-629-5543). Enclosures

cc: Dick Denney  
Barbara Brown  
Cheryl Wasserman

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**DATE:** Nov 26, 1975

**SUBJECT:** Definition of Sources Subject to Prevention of  
Significant Deterioration (PSD) New Source Review

**FROM:** Asa B. Foster, Jr., Director  
Air & Hazardous Materials Division

**TO:** Dr. Bernard J. Steigerwald  
Deputy Assistance Administrator  
Air Quality Planning & Standards

Summary

Two of the source categories contained in the Prevention of Significant Deterioration (PSD) regulations are Phosphate Rock Processing Plants and Fuel Conversion Plants. In implementing these regulations there is some confusion as to the emission points actual covered in the definition. Any further definition and/or clarification is desirable.

Action

Please provide-me with a clarification of the emission points that EPA intends to be included in the definitions of Phosphate Rock Processing and Fuel Conversion Plants.

Background

40 CFR 52.21(d).

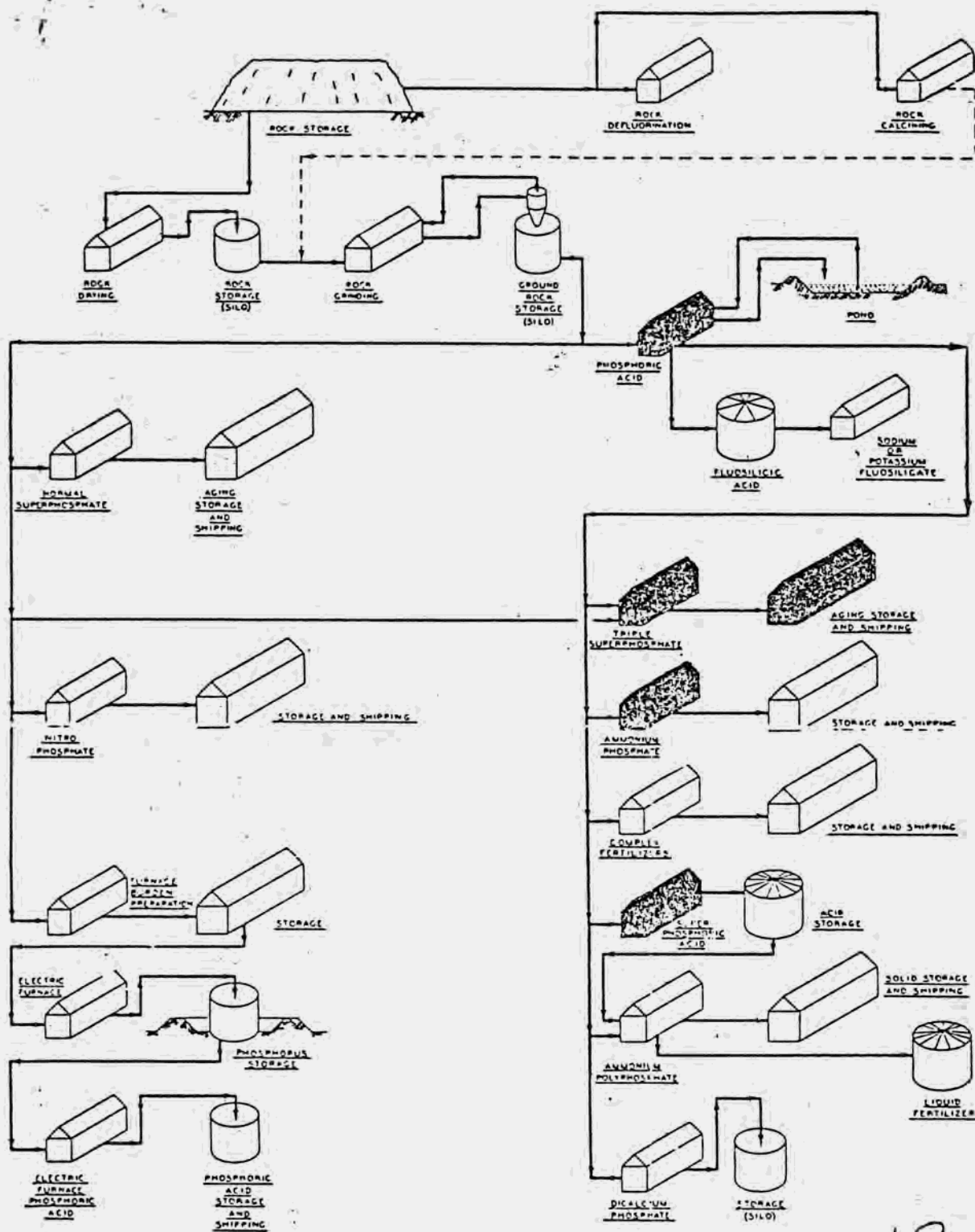


FIGURE 1  
PHOSPHATE ROCK PROCESSING INDUSTRY

20/3

Table 1 - Processes Commonly Associated with Phosphate Rock Preparation

| Emission Source                                                                                                                                                                                                                                                                                                                                                                                                                                                | Emission Factors                                                                          |                                                                           | BACT <sup>2</sup>                                                                                                                                               | Typical Size of New Facility                                            | Emissions from Typical Facility                       | Comments                                                                                                  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|-------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Potential <sup>1</sup>                                                                    | BACT <sup>2</sup>                                                         |                                                                                                                                                                 |                                                                         |                                                       |                                                                                                           |
| I. Phosphate Rock Preparation<br>Mining<br>Beneficiation<br>Drying<br>Calcining<br>Modulizing<br>Grinding<br>Thermal DeFluorination<br>Material Handling<br>and Storage                                                                                                                                                                                                                                                                                        | Negl.<br>Negl.<br>3.3-14#/ton<br>7.9#/ton<br>1.8 to 4.4#/ton<br>7.5#/ton<br>1.3 to 2#/ton | NA<br>NA<br>.086#/ton<br>.159#/ton<br>.031#/ton<br>.075#/ton<br>.017#/ton | NA<br>NA<br>Scrubber(99%)<br>Scrubber(98%)<br>Baghouse(99%)<br>Scrubber(99%)<br>Scrubber(99%)                                                                   | 250tons/hr<br>50tons/hr<br>50tons/hr<br>NA<br>50tons/hr                 | 21.5#/hr<br>8.0#/hr<br>4.3#/hr<br>--<br>0.9#/hr       | Mining wet rock (10 - 15% moisture)<br>Concentration processes occur in a wet slurry<br><br>None expected |
| II. Phosphate Fertilizer Industry<br>Phosphoric Acid Mfg<br>Wet Process<br>Thermal Process<br>Superphosphoric Acid Plant<br>Vacuum Evaporation<br>(evaporators, cooling tanks, hot wells)<br>Diammonium Phosphate Plants<br>(reactor, granulator, dryer, cooler, screens, mills)<br>Run-of-Pile Triple Superphosphate (mixer, curing belt, conveyors, storage)<br>granular triple Superphosphate (reactor, granulator, dryer, cooler, screens, mills, storage) | Negl.<br>134#/ton<br>1.3#/ton<br>82#/ton<br>2.5#/ton<br>1.51#/ton                         | NA<br>.134#/ton<br>.013#/ton<br>1.64#/ton<br>0.05#/ton<br>0.03#/ton       | NA<br>Scrubber(99%)<br>Venturi Scrubber w/packed tower<br>Scrubber(98%)<br>w/packed tower<br>Scrubber(98%)<br>w/packed tower<br>Scrubber(98%)<br>w/packed tower | 500tons/day<br>200tons/day<br>500tons/day<br>600tons/day<br>500tons/day | 0.1#/hr<br>0.1#/hr<br>34.2#/hr<br>1.25#/hr<br>0.6#/hr | Covered under NSPS/Fluorides, low part impact<br>None expected                                            |
| III. Other Products<br>Elemental phosphorous<br>Animal feed                                                                                                                                                                                                                                                                                                                                                                                                    | None expected<br>No data                                                                  |                                                                           |                                                                                                                                                                 |                                                                         |                                                       |                                                                                                           |

1. Estimates only, especially in II.
2. Intended to be indications only.

3/3

ROY COOPER  
Governor

MICHAEL S. REGAN  
Secretary

MICHAEL ABRACZINSKAS  
Director



NORTH CAROLINA  
Environmental Quality

January 14, 2019

Mr. Royal Smith  
EVP of Operations  
Enviva Pellets Hamlet, LLC  
7200 Wisconsin Avenue  
Bethesda, Maryland 20814

Dear Mr. Smith:

SUBJECT: Air Quality Permit No. 10365R03  
Facility ID: 7700096  
Enviva Pellets Hamlet, LLC  
Hamlet, North Carolina  
Richmond County  
PSD Status: Minor  
Fee Class: Title V

In accordance with your Air Permit Application received on May 14, 2018 we are forwarding herewith Air Quality Permit No. 10365R03 to Enviva Pellets Hamlet, LLC, 1125 North NC Highway 177, Hamlet, North Carolina, authorizing the construction and operation, of the emission source(s) and associated air pollution control device(s) specified herein. Additionally, any emissions activities determined from your Air Quality Permit Application as being insignificant per 15A North Carolina Administrative Code 2Q .0503(8) have been listed for informational purposes as an "ATTACHMENT."

As the designated responsible official it is your responsibility to review, understand, and abide by all of the terms and conditions of the attached permit. It is also your responsibility to ensure that any person who operates any emission source and associated air pollution control device subject to any term or condition of the attached permit reviews, understands, and abides by the condition(s) of the attached permit that are applicable to that particular emission source.

If any parts, requirements, or limitations contained in this Air Quality Permit are unacceptable to you, you have the right to request a formal adjudicatory hearing within 30 days following receipt of this permit, identifying the specific issues to be contested. This hearing request must be in the form of a written petition, conforming to NCGS (North Carolina General Statutes) 150B-23, and filed with both the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, North Carolina 27699-6714 and the Division of Air Quality, Permitting Section, 1641 Mail Service Center, Raleigh, North Carolina 27699-1641. The form for requesting a formal adjudicatory hearing may be obtained upon request from the Office of Administrative Hearings. Please note that this permit will be stayed in its entirety upon receipt of the request for a hearing. Unless a request for a hearing is made pursuant to NCGS 150B-23, this Air Quality Permit shall be final and binding 30 days after issuance.



North Carolina Department of Environmental Quality | Division of Air Quality  
217 West Jones Street | 1641 Mail Service Center | Raleigh, North Carolina 27699-1641  
919.707.8400

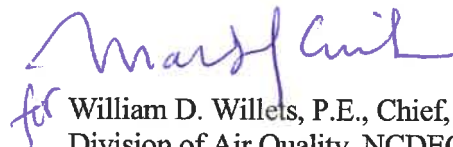
You may request modification of your Air Quality Permit through informal means pursuant to NCGS 150B-22. This request must be submitted in writing to the Director and must identify the specific provisions or issues for which the modification is sought. Please note that this Air Quality Permit will become final and binding regardless of a request for informal modification unless a request for a hearing is also made under NCGS 150B-23.

The construction of new air pollution emission source(s) and associated air pollution control device(s), or modifications to the emission source(s) and air pollution control device(s) described in this permit must be covered under an Air Quality Permit issued by the Division of Air Quality prior to construction unless the Permittee has fulfilled the requirements of GS 143-215-108A(b) and received written approval from the Director of the Division of Air Quality to commence construction. Failure to receive an Air Quality Permit or written approval prior to commencing construction is a violation of GS 143-215.108A and may subject the Permittee to civil or criminal penalties as described in GS 143-215.114A and 143-215.114B.

Richmond County has triggered increment tracking under PSD for NO<sub>x</sub>, PM-10, and PM-2.5. This modification will result in an increase of 3.61 pounds per hour of NO<sub>x</sub>, a decrease of 7.12 pounds per hour of PM-10, and a decrease of 4.26 pounds per hour of PM-2.5.

This Air Quality Permit shall be effective from January 14, 2019 until February 28, 2021, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein. Should you have any questions concerning this matter, please contact Kevin Godwin at (919) 707-8480 or [kevin.godwin@ncdenr.gov](mailto:kevin.godwin@ncdenr.gov).

Sincerely yours,

A handwritten signature in blue ink, appearing to read "W. D. Willeis", is written over the typed name.

for William D. Willeis, P.E., Chief, Permitting Section  
Division of Air Quality, NCDEQ

c: EPA Region 4  
Heather Carter, Supervisor, Fayetteville Regional Office  
Shannon Vogel, Stationary Source Compliance Branch  
Central Files  
Connie Horne (Cover letter only)

## ATTACHMENT

### Insignificant Activities per 15A NCAC 02Q .0503(8)

| Emission Source ID No.        | Emission Source Description                        |
|-------------------------------|----------------------------------------------------|
| IES-CHIP-1                    | Log chipping (138 tons per hour)                   |
| IES-BARKHOG                   | Bark hog (25 tons per hour)                        |
| IES-GWH                       | Green wood handling operations                     |
| IES-GN                        | Emergency generator (671 brake horsepower)         |
| IES-FWP                       | Fire water pump (131 brake horsepower)             |
| IES-DRYSHAVE                  | Dried shaving material handling (25 tons per hour) |
| IES-TK-1                      | Diesel fuel storage tank (1,000 gallons capacity)  |
| IES-TK-2                      | Diesel fuel storage tank (185 gallons capacity)    |
| IES-TK-3                      | Diesel fuel storage tank (5,000 gallons capacity)  |
| IES-GWSP-1 through IES-GWSP-4 | Green wood storage piles                           |
| IES-BFSP-1 and IES-BFP-2      | Bark fuel storage piles                            |
| IES-BFB                       | Bark fuel bin                                      |
| IES-DEBARK-1                  | De-barker (275 tons per hour)                      |

1. Because an activity is insignificant does not mean that the activity is exempted from an applicable requirement or that the Permittee is exempted from demonstrating compliance with any applicable requirement.
2. When applicable, emissions from stationary source activities identified above shall be included in determining compliance with the permit requirements for toxic air pollutants under 15A NCAC 02D .1100 "Control of Toxic Air Pollutants" or 02Q .0711 "Emission Rates Requiring a Permit."
3. For additional information regarding the applicability of MACT or GACT see the DAQ page titled "Specific Permit Conditions Regulatory Guide." The link to this site is as follows: <http://deq.nc.gov/about/divisions/air-quality/air-quality-permits/specific-permit-conditions-regulatory-guide>.

## Summary of Changes to Permit

The following changes were made to the existing Air Permit:

| Page No. | Section                                       | Description of Changes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|----------|-----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| N/A      | Attachment – List of Insignificant Activities | <p>Included the following sources:<br/>Log Chipping (ID No. IES-CHIP-1),<br/>Bark Hog (ID No. IES-BARKHOG),<br/>Emergency Generator (ID No. IES-GN),<br/>Fire water pump (ID No. IES-FWP),<br/>Dried shaving material handling (ID No. IES-DRYSHAVE),<br/>Bark fuel storage piles (ID No. IES-BFSP-1 and 2),<br/>Bark fuel bin (ID No. IES-BFB).</p> <p>Updated storage tank capacities as follows:<br/>Diesel fuel storage tank (ID No. IES-TK-1, 1,000 gallons capacity),<br/>Diesel fuel storage tank (ID No. IES-TK-2, 185 gallons capacity),<br/>Diesel fuel storage tanks (ID No. IES-TK-3, 5,000 gallons capacity).</p> |



| Page No. | Section                             | Description of Changes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|----------|-------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3        | Table of Permitted Emission Sources | <p>Removed the PSD designation throughout the table.</p> <p><u>Included the following sources and control devices:</u><br/> Hammermill collection conveyor (ID No. ES-HMC) controlled by bagfilter (ID No. CD-HMC-BH),<br/> Pellet cooler high-pressure fines relay (ID No. ES-PCHP) controlled by bagfilter (ID No. CD-PCHP-BH),<br/> Pellet cooler low-pressure fines relay (ID No. ES-PCLP) controlled by bagfilter (ID No. CD-PCLP-BH),<br/> Pellet dust collection transfer bin (ID No. PDCTB) controlled by bagfilter (ID No. CD-PDCTB-BH),<br/> Additive handling and storage (ID No. ES-ADD) controlled by bagfilter (ID No. CD-ADD-BH).</p> <p>Removed cyclones as control devices.</p> <p>Removed Hammermill Area (ID No. ES-HMA) emission point.</p> <p>Changed the Pellet Loadout Bins from eight (8) to two (2) bins (ID Nos. ES-PB-1 and 2)</p> <p>Included new regenerative thermal oxidizer (ID No. CD-RTO-1) installed on Green wood hammermills (ID No. GMH-1 through 3) and Rotary dryer (ID No. ES-DRYER).</p> <p>Included new wet scrubber (ID No. CD-WSB) and regenerative catalytic oxidizer (ID No. CD-RCO) installed on Pellet coolers (ID Nos. ES-CLR-1 through 6)</p> <p><u>Moved the following sources to the insignificant activity list:</u><br/> Log Chipping (ID No. IES-CHIP-1),<br/> Bark Hog (ID No. IES-BARKHOG),<br/> Emergency Generator (ID No. IES-GM), and<br/> Fire water pump (ID No. IES-FWP).</p> |
| 4        | 2.1 A.                              | Updated emission source description to reflect the proposed emission source configuration.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 5        | 2.1 A.1                             | Updated the 15A NCAC 02D .0515 condition to reflect the proposed control device configuration.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 8        | 2.2 A.2.                            | Removed the existing PSD condition and replaced with a PSD avoidance condition.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |



State of North Carolina  
Department of Environmental Quality  
Division of Air Quality

## AIR QUALITY PERMIT

| Permit No. | Replaces Permit No.(s) | Effective Date   | Expiration Date   |
|------------|------------------------|------------------|-------------------|
| 10365R03   | 10365R02               | January 14, 2019 | February 28, 2021 |

Until such time as this permit expires or is modified or revoked, the below named Permittee is permitted to construct and operate the emission source(s) and associated air pollution control device(s) specified herein, in accordance with the terms, conditions, and limitations within this permit. This permit is issued under the provisions of Article 21B of Chapter 143, General Statutes of North Carolina as amended, and Title 15A North Carolina Administrative Codes (15A NCAC), Subchapters 2D and 2Q, and other applicable Laws.

Pursuant to Title 15A NCAC, Subchapter 2Q, the Permittee shall not construct, operate, or modify any emission source(s) or air pollution control device(s) without having first submitted a complete Air Quality Permit Application to the permitting authority and received an Air Quality Permit, except as provided in this permit.

**Permittee:** **Enviva Pellets Hamlet, LLC**  
**Facility ID:** **7700096**

**Facility Site Location:** **1125 North NC Highway 177**  
**City, County, State, Zip:** **Hamlet, Richmond County, North Carolina, 28345**

**Mailing Address:** **7200 Wisconsin Avenue**  
**City, State, Zip:** **Bethesda, Maryland 20814**

**Application Number:** **7700096.18A**  
**Complete Application Date:** **June 6, 2017**

**Primary SIC Code:** **2499**  
**Division of Air Quality,**  
**Regional Office Address:** **Fayetteville Regional Office**  
**Systel Building**  
**225 Green Street, Suite 714**  
**Fayetteville, North Carolina, 28301**

## Table Of Contents

|            |                                                                                                                                                                         |
|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SECTION 1: | PERMITTED EMISSION SOURCE (S) AND ASSOCIATED<br>AIR POLLUTION CONTROL DEVICE (S) AND APPURTENANCES                                                                      |
| SECTION 2: | SPECIFIC LIMITATIONS AND CONDITIONS                                                                                                                                     |
| 2.1-       | Emission Source(s) Specific Limitations and Conditions<br>(Including specific requirements, testing, monitoring, recordkeeping, and<br>reporting requirements)          |
| 2.2-       | Multiple Emission Source(s) Specific Limitations and Conditions<br>(Including specific requirements, testing, monitoring, recordkeeping, and<br>reporting requirements) |
| SECTION 3: | GENERAL PERMIT CONDITIONS                                                                                                                                               |

## SECTION 1- PERMITTED EMISSION SOURCE(S) AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S) AND APPURTENANCES

The following table contains a summary of all permitted emission sources and associated air pollution control devices and appurtenances:

| <b>Emission Source ID No.</b>                                   | <b>Emission Source Description</b>                                                           | <b>Control Device ID No.</b>  | <b>Control Device Description</b>                                                                                                                                                                        |
|-----------------------------------------------------------------|----------------------------------------------------------------------------------------------|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ES-GHM-1, ES-GHM-2, and ES-GHM-3                                | Green wood hammermills                                                                       | CD-WESP<br><br>CD-RTO-1       | One wet electrostatic precipitator (square feet of collector plate area to be determined) in series with<br><br>One natural gas-fired regenerative thermal oxidizer (32 million Btu per hour heat input) |
| ES-DRYER<br><b>02D .1112 Case-by-case MACT</b>                  | Green wood direct-fired rotary dryer system (250.4 million Btu per hour heat input)          | CD-WESP<br><br>CD-RTO-1       | One wet electrostatic precipitator (square feet of collector plate area to be determined) in series with<br><br>One natural gas-fired regenerative thermal oxidizer (32 million Btu per hour heat input) |
| ES-DWH                                                          | Dried wood handling                                                                          | CD-DWH-BH-1 and CD-DWH-BH-2   | Two bagfilters (square feet filter surface to be determined) operating in parallel                                                                                                                       |
| ES-HM-1 through ES-HM-8<br><b>02D .1112 Case-by-case MACT</b>   | Eight (8) hammermills                                                                        | CD-HM-BH-1 through CD-HM-BH-8 | Eight (8) bagfilters (square feet filter surface area to be determined)                                                                                                                                  |
| ES-HMC                                                          | Hammermill collection conveyor                                                               | CD-HMC-BH                     | One bagfilter (square feet filter surface area to be determined)                                                                                                                                         |
| ES-PMFS                                                         | Pellet mill feed silo                                                                        | CD-PMFS-BH                    | One bagfilter (square feet of filter surface area to be determined)                                                                                                                                      |
| ES-CLR-1 through ES-CLR-6<br><b>02D .1112 Case-by-case MACT</b> | Six (6) pellet coolers                                                                       | CD-WSB<br><br>CD-RCO          | One wet scrubber (minimum liquid injection rate to be determined)<br><br>One natural gas-fired regenerative catalytic oxidizer (32 million Btu per hour heat input)                                      |
| ES-PCHP                                                         | One pellet cooler high-pressure fines relay system                                           | CD-PCHP-BH                    | One bagfilter (square feet of filter surface area to be determined)                                                                                                                                      |
| ES-PCLP                                                         | One pellet cooler low-pressure fines relay system                                            | CD-PCLP-BH                    | One bagfilter (square feet of filter surface area to be determined)                                                                                                                                      |
| ES-PDCTB                                                        | One pellet dust collection transfer bin                                                      | CD-PDCTB-BH                   | One bagfilter (square feet of filter surface area to be determined)                                                                                                                                      |
| ES-FPH, ES-PB1, ES-PB2, ES-PL-1 through ES-PL-3                 | Finished product handling and two (2) pellet loadout bins and three (3) pellet mill loadouts | CD-FPH-BH                     | One bagfilter (square feet of filter surface area to be determined)                                                                                                                                      |

| <b>Emission Source ID No.</b> | <b>Emission Source Description</b> | <b>Control Device ID No.</b> | <b>Control Device Description</b>                                   |
|-------------------------------|------------------------------------|------------------------------|---------------------------------------------------------------------|
| ES-ADD                        | Additive handling and storage      | CD-ADD-BH                    | One bagfilter (square feet of filter surface area to be determined) |

## SECTION 2 - SPECIFIC LIMITATIONS AND CONDITIONS

### 2.1- Emission Source(s) and Control Devices(s) Specific Limitations and Conditions

The emission source(s) and associated air pollution control device(s) and appurtenances listed below are subject to the following specific terms, conditions, and limitations, including the testing, monitoring, recordkeeping, and reporting requirements as specified herein:

- A. Green wood hammermills (ID Nos. ES-GHM-1, 2, and 3), Rotary dryer system (ID No. ES-DRYER), Dried wood handling (ID No. ES-DWH), Hammermills (ID Nos. ES-HM-1 through ES-HM-8), Hammermill collection conveyor (ID No. ES-HMC), Pellet mill feed silo (ID No. ES-PMFS), Pellet coolers (ID Nos. ES-CLR-1 through ES-CLR-6), Pellet cooler high-pressure fines relay system (ID No. ES-PCHP), Pellet cooler low-pressure fines relay system (ID No. ES-PCLP), Pellet dust collection system transfer bin (ID No. ES-PDCTB), Finished product handling and load-out bins (ID Nos. ES-FPH, ES-PB-1 and ES-PB-2), and Additive handling and storage (ID No. ES-ADD)

The following table provides a summary of limits and standards for the emission source(s) described above:

| <b>Regulated Pollutant</b>     | <b>Limits/Standards</b>                                                                                                                                                             | <b>Applicable Regulation</b>                       |
|--------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| Particulate matter             | $E = 4.10 \times P^{0.67}$ for $P < 30$ tph<br>$E = 55 \times P^{0.11} - 40$ for $P \geq 30$ tph<br><br>where, E = allowable emission rate (lb/hr)<br>P = process weight rate (tph) | 15A NCAC 02D .0515                                 |
| Sulfur dioxide                 | 2.3 pounds per million Btu                                                                                                                                                          | 15A NCAC 02D .0516                                 |
| Visible emissions              | 20 percent opacity when averaged over a 6-minute period                                                                                                                             | 15A NCAC 02D .0521                                 |
| Hazardous Air Pollutants (HAP) | See Section 2.1 A.4.                                                                                                                                                                | 15A NCAC 02D .1112<br>[§ 112(g) Case-by-case MACT] |

| Regulated Pollutant                                                                            | Limits/Standards                                                         | Applicable Regulation                                  |
|------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|--------------------------------------------------------|
| Volatile organic compounds (VOC), Nitrogen Oxides (NO <sub>x</sub> ), and Carbon Monoxide (CO) | Less than 250 tons per consecutive 12-month period, See Section 2.2 A.2. | 15A NCAC 02Q .0317 for avoidance of 15A NCAC 02D .0530 |

**1. 15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES**

- a. Emissions of particulate matter from these sources shall not exceed an allowable emission rate as calculated by the following equation: [15A NCAC 02D .0515(a)]

$$E = 4.10 \times P^{0.67} \quad \text{for } P < 30 \text{ tph}$$

$$E = 55 \times P^{0.11} - 40 \quad \text{for } P \geq 30 \text{ tph}$$

Where E = allowable emission rate in pounds per hour  
P = process weight in tons per hour

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

**Testing** [15A NCAC 02Q .0308(a)]

- b. Under the provisions of NCGS 143-215.108, the Permittee shall test the outlet of the regenerative thermal oxidizer (ID No. CD-RTO-1) and the regenerative catalytic oxidizer (ID No. CD-RCO) for total suspended particulate (TSP) in accordance with a testing protocol approved by the DAQ. Testing shall be completed and the results submitted within 180 days of commencement of operation unless an alternate date is approved by the DAQ.

**Monitoring/Recordkeeping** [15A NCAC 02Q .0308(a)]

- c. The Permittee shall maintain production records such that the process rates "P" in tons per hour, as specified by the formulas contained above (or the formulas contained in 15A NCAC 02D .0515), can be derived, and shall make these records available to a DAQ authorized representative upon request.
- d. Particulate matter emissions from the green wood hammermills (ID No. ES-GHM-1, 2, and 3) and rotary dryer (ID No. ES-DRYER) shall be controlled by one wet electrostatic precipitator (ID No. CD-WESP) in series with one regenerative thermal oxidizer (ID No. CD-RTO-1). Particulate matter emissions from dried wood handling (ID No. ES-DWH) shall be controlled by two bagfilters (ID Nos. CD-DWH-BH-1 and 2) operating in parallel. Particulate matter emissions from hammermills (ID No. ES-HM-1 through 8) shall be controlled by bagfilters (ID No. CD-HM-BH-1 through 8). Particulate matter emissions from the hammermill collection conveyor (ID No. ES-HMC) shall be controlled by a bagfilter (ID No. CD-HMC-BH). Particulate matter emissions from the pellet mill feed silo (ID No. ES-PMFS) shall be controlled by a bagfilter (ID No. CD-PMFS-BH). Particulate matter emissions from pellet coolers (ID Nos. ES-CLR-1 through 6) shall be controlled by a wet scrubber (ID No. CD-WSB) in series with a regenerative catalytic oxidizer (ID No. CD-RCO). Particulate matter emissions from the pellet cooler high-pressure fines relay system (ID No. ES-PCHP) shall be controlled by a bagfilter (ID No. CD-PCHP-BH). Particulate matter emissions from the pellet cooler low-pressure fines relay system (ID No. ES-PCLP) shall be controlled by a bagfilter (ID No. CD-PCLP). Particulate matter from the pellet dust collection transfer bin (ID No. ES-

PDCTB) shall be controlled by a bagfilter (ID No. CD-PDCTB-BH). Particulate matter emissions from the finished product handling (ID No. ES-FPH) and pellet loadout bins (ID No. ES-PB1 and 2) shall be controlled by a bagfilter (ID No. CD-FPH-BH). Particulate matter emissions from the additive handling and storage (ID No. ES-ADD) shall be controlled by a bagfilter (ID No. CD-ADD-BH).

For bagfilters:

To ensure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there are no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:

- i. a monthly visual inspection of the system ductwork and material collection unit for leaks, and
- ii. an annual (for each 12-month period following the initial inspection) internal inspection of the bagfilters' structural integrity.

For WESP:

To ensure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there are no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:

The Permittee shall establish the minimum primary voltage and minimum current within the first 30 days following the commencement of operation of the dryer. To assure compliance and effective operation of the wet electrostatic precipitator, the Permittee shall monitor and record the primary voltage and minimum current through the precipitator for each day of the calendar year period that the dryer system is operated. The Permittee shall be allowed three (3) days of absent observations per semi-annual period.

For RTO and RCO:

To ensure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer.

- e. The results of inspection and maintenance shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each inspection;
  - iii. the results of any maintenance performed; and
  - iv. any variance from manufacturer's recommendations, if any, and corrections made.

**Reporting**

- f. The Permittee shall submit the results of any maintenance performed on the WESP, bagfilters, and bin vent filters within 30 days of a written request by the DAQ.

**2. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES**

- a. Emissions of sulfur dioxide from these sources shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard. [15A NCAC 2D .0516]

**Testing** [15A NCAC 02Q .0308(a)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition 17. found in Section 3.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 02Q .0308(a)]

- c. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from firing biomass in the dryer system or natural gas in the thermal oxidizers.

**3. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from these sources shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 02D .0521 (d)]

**Testing** [15A NCAC 02Q .0308(a)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition 17. found in Section 3.

**Monitoring** [15A NCAC 02Q .0308(a)]

- c. To ensure compliance, once a month the Permittee shall observe the emission points of these sources for any visible emissions above normal. The monthly observation must be made for each month of the calendar year period to ensure compliance with this requirement. The Permittee shall establish "normal" for the source in the first 30 days following the effective date of the permit. If visible emissions from this source are observed to be above normal, the Permittee shall either:
  - i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
  - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 A.3. a. above.

**Recordkeeping** [15A NCAC 02Q .0308(a)]

- d. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
  - iii. the results of any corrective actions performed.

**Reporting** [15A NCAC 02Q .0308(a)]

- e. No reporting is required.

**4. 15A NCAC 02D .1112 National Emissions Standards for Hazardous Air Pollutants, 112(g) Case-by-Case Maximum Achievable Control Technology**

**Testing** [15A NCAC 02Q .0308(a)]

- a. **Initial Performance Tests** – Under the provisions of North Carolina General Statute 143-215.108, the Permittee shall establish emission factors for HAPs by conducting an initial performance test on the wood-fired direct heat drying system (ID No. ES-DRYER), the green wood hammermills (ID Nos. ES-GHM-1, ES-GHM-2, and ES-GHM-3), the dry hammermills (ID Nos. ES-HM-1 to ES-HM-8), the dry wood handling operations (ID Nos. ES-DWH), and the pellet presses and coolers (ID Nos. ES-CLR-1 through ES-CLR-6). Initial testing shall be conducted in accordance with the following:
  - i. The pollutants and emission sources to be tested during the initial performance test are listed in the following table:



| <b>Emission Source</b>                                        | <b>Pollutant</b>                         |
|---------------------------------------------------------------|------------------------------------------|
| Dryer system/greenwood<br>hammermills<br>controlled via a RTO | Acetaldehyde<br>Acrolein<br>Formaldehyde |
| Pellet coolers pellet presses<br>controlled via a RCO         | Methanol<br>Phenol                       |
| One dry hammermill                                            | Propionaldehyde                          |
| Dry wood handling operations                                  |                                          |

ii. Initial testing shall be conducted in accordance with Section 2.2 A.2. c. ii. through x. below.

- b. **Periodic Performance Tests** – Under the provisions of North Carolina General Statute 143-215.108, the Permittee shall establish emission factors for HAPs by conducting an initial performance test on the wood-fired direct heat drying system (ID No. ES-DRYER), the green wood hammermills (ID Nos. ES-GHM-1, ES-GHM-2, and ES-GHM-3), the dry hammermills (ID Nos. ES-HM-1 to ES-HM-8), the dry wood handling operations (ID Nos. ES-DWH), and the pellet presses and coolers (ID Nos. ES-CLR-1 through ES-CLR-6). Periodic testing shall be conducted in accordance with the following:

- i. The pollutants and emission sources to be tested during the periodic performance tests are listed in the following table:

| <b>Emission Sources</b>                                       | <b>Pollutant</b>                         |
|---------------------------------------------------------------|------------------------------------------|
| Dryer system/greenwood<br>hammermills<br>controlled via a RTO | Acetaldehyde<br>Acrolein<br>Formaldehyde |
| Pellet coolers pellet presses<br>controlled via a RCO         | Methanol<br>Phenol                       |
| One dry hammermill                                            | Propionaldehyde                          |
| Dry wood handling operations                                  |                                          |

ii. Periodic testing shall be conducted in accordance with Section 2.2 A.2. d. ii. through ix. below.

- c. **Monitoring/Recordkeeping/Reporting** [15A NCAC 02Q .0308(a)]  
Monitoring, recordkeeping, and reporting shall be performed in accordance with 2.2 A.2.

## 2.2- Multiple Emission Source(s) Specific Limitations and Conditions

### A. Facility-wide Emission Sources

The following table provides a summary of limits and standards for the emission source(s) describe above:

| <b>Regulated Pollutant</b> | <b>Limits/Standards</b>                                                                                                      | <b>Applicable Regulation</b>                                 |
|----------------------------|------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|
| Fugitive dust              | Minimize fugitive dust beyond property boundary                                                                              | 15A NCAC 02D .0540                                           |
| VOC<br>NOx<br>CO           | Less than 250 tons per 12-month period,<br>Less than 250 tons per 12-month period,<br>Less than 250 tons per 12-month period | 15A NCAC 02Q .0317 for<br>avoidance of 15A NCAC 02D<br>.0530 |

**1. Fugitive Dust Control Requirement [15A NCAC 02D .0540] - STATE ENFORCEABLE ONLY**

As required by 15A NCAC 2D .0540 "Particulates from Fugitive Dust Emission Sources," the Permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary. If substantive complaints or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR, Appendix A), the owner or operator may be required to submit a fugitive dust plan as described in 02D .0540(f).

"Fugitive dust emissions" means particulate matter from process operations that does not pass through a process stack or vent and that is generated within plant property boundaries from activities such as: unloading and loading areas, process areas stockpiles, stock pile working, plant parking lots, and plant roads (including access roads and haul roads).

**2. 15A NCAC 02Q .0317 for avoidance of 15A NCAC 02D .0530: PREVENTION OF SIGNIFICANT DETERIORATION**

- a. In order to avoid applicability of 15A NCAC 2D .0530(g), the above emission sources shall discharge into the atmosphere less than 250 tons of volatile organic compounds (VOC), nitrogen oxides (NO<sub>x</sub>), and carbon monoxide (CO) per consecutive 12-month period. [15A NCAC 2D .0530]
- b. To ensure that the limits established above are not exceeded,
  - i. the greenwood hammermills and pellet dryer will be controlled by a regenerative thermal oxidizer (ID No. CD-RTO-1),
  - ii. the pellet mills and pellet coolers will be controlled by a regenerative catalytic oxidizer (ID No. CD-RCO), and
  - iii. the facility will not process more than 625,011 oven dried tons per year (ODT/year) with a maximum of 85% softwood, on a rolling 12-month average basis.

**Testing [15A NCAC 02Q .0308(a)]**

- c. **Initial Performance Tests** – Under the provisions of North Carolina General Statute 143-215.108, the Permittee shall demonstrate compliance with PSD avoidance limits in Section 2.2 A.2.a. above by conducting an initial performance test on the wood-fired direct heat drying system (ID No. ES-DRYER), the green wood hammermills (ID Nos. ES-GHM-1, ES-GHM-2, and ES-GHM-3), the dry hammermills (ID Nos. ES-HM-1 to ES-HM-8), the dry wood handling operations (ID Nos. ES-DWH), and the pellet presses and coolers (ID Nos. ES-CLR-1 through ES-CLR-6). Initial testing shall be conducted in accordance with the following:
  - i. The pollutants and emission sources to be tested during the initial performance test are listed in the following table:

| Emission Sources                                        | Pollutant       |
|---------------------------------------------------------|-----------------|
| Dryer system/greenwood hammermills controlled via a RTO | VOC             |
|                                                         | PM/PM10/PM2.5   |
|                                                         | NO <sub>x</sub> |
|                                                         | CO              |
| Pellet coolers pellet presses controlled via a RCO      | VOC             |
|                                                         | PM/PM10/PM2.5   |
| One dry hammermill                                      | VOC             |
|                                                         | PM/PM10/PM2.5   |
| Dry wood handling operations                            | VOC             |
|                                                         | PM/PM10/PM2.5   |

- ii. The Permittee shall utilize EPA reference methods contained in 40 CFR 60, Appendix A, 40 CFR Part 63, and OTM 26 AND in accordance with a testing protocol (using testing protocol submittal form) approved by the DAQ.
- iii. The Permittee shall submit a protocol to the DAQ at least 45 days prior to compliance testing.

- iv. The Permittee shall be responsible for ensuring, within practicable limits, that the equipment or processes being tested are operated at or near the maximum normal production rate or at a lesser rate if specified by the Director or his delegate.
  - v. To the extent possible, testing shall be conducted at the maximum normal operating softwood percentage.
  - vi. The Permittee shall establish the firebox temperature of the regenerative thermal oxidizer (ID No. CD-RTO-1) during testing. The firebox temperature shall be based upon the average temperature over the span of the test runs. Documentation for the firebox temperature shall be submitted to the DAQ as part of the test report for the regenerative thermal oxidizer.
  - vii. The Permittee shall establish the temperature at the inlet of the catalytic oxidizer (ID No. CD-RCO) during testing when operating in both modes. The inlet temperature shall be based upon the average temperature over the span of the test runs. Documentation for the inlet temperature shall be submitted to the DAQ as part of the test report for the catalytic oxidizer.
  - viii. Testing is required on only one of the dry hammermills. The Permittee shall ensure that the dry hammermill selected for testing is representative of operations of all the dry hammermills.
  - ix. Testing shall be completed within 180 days of commencement of operation.
  - x. The Permittee shall submit a written report of the test results to the Regional Supervisor, DAQ, within 60 days of completion of the test.
- d. Periodic Performance Tests – Under the provisions of North Carolina General Statute 143-215.108, the Permittee shall demonstrate compliance with the PSD avoidance in Section 2.2 A.2.a. above by conducting periodic performance tests on the wood-fired direct heat drying system (ID No. ES-DRYER), the green wood hammermills (ID Nos. ES-GHM-1, ES-GHM-2, and ES-GHM-3), the dry hammermills (ID Nos. ES-HM-1 to ES-HM-8), the dry wood handling operations (ID Nos. ES-DWH), and the pellet presses and coolers (ID Nos. ES-CLR-1 through ES-CLR-6). Periodic testing shall be conducted in accordance with the following:
- i. The pollutants and emission sources to be tested during the periodic performance tests are listed in the following table:

| Emission Source                                         | Pollutant     |
|---------------------------------------------------------|---------------|
| Dryer system/greenwood hammermills controlled via a RTO | VOC           |
|                                                         | PM/PM10/PM2.5 |
|                                                         | NOx           |
|                                                         | CO            |
| Pellet coolers pellet presses controlled via a RCO      | VOC           |
|                                                         | PM/PM10/PM2.5 |
| One dry hammermill                                      | VOC           |
|                                                         | PM/PM10/PM2.5 |
| Dry wood handling operations                            | VOC           |
|                                                         | PM/PM10/PM2.5 |

- ii. Testing shall be conducted in accordance with Section 2.2 A.2. c. ii. through v. above.
- iii. Testing is required on only one of the dry hammermills. The Permittee shall ensure that the dry hammermill selected for testing is representative of operations of all the dry hammermills. A different hammermill shall be tested for each periodic performance tests, until all the hammermills have been tested.
- iv. The Permittee shall conduct performance tests when the following conditions are met:
  - (A) As the softwood content increases by more than 10 percentage points over what was established during the initial test up to 85%, or
  - (B) As the production rate increases by more than 10 percentage points over what was established during the initial test up to 625,011 ODT/year.

- (C) At a minimum testing shall be conducted annually. Annual performance tests shall be completed no later than 13 months after the previous performance test.
- v. The Permittee shall conduct the periodic performance test and submit a written report of the test results to the Regional Supervisor, DAQ, within 90 days from the date the monthly softwood content or overall production rate increased as described in Section 2.2 A.2.d.iv (A) and (B) above. The Permittee shall submit a written report of results for the periodic performance test as described in Section 2.2.A.2.d.iv (C) to the Regional Supervisor, DAQ, within 60 days of completion of the test.
  - vi. When performance testing has occurred at 85 percent softwood AND 90 percent of the maximum permitted throughput, subsequent periodic performance testing shall occur on an annual basis and shall be completed no later than 13 months after the previous performance test. The Permittee shall submit a written report of the periodic performance test results to the Regional Supervisor, DAQ, within 60 days of completion of the test.
  - vii. The Permittee may re-establish any parametric operating value during periodic testing. Compliance with previously approved parametric operating values is not required during periodic required testing or other tests undertaken to re-establish parametric operating values by the Permittee.
  - viii. When establishing new parametric monitoring values via source testing, the Permittee shall include an application for an Administrative Amendment to the permit with the submittal of the test results.
  - ix. The Permittee shall comply with applicable emission standards at all times, including during periods of testing.

**Monitoring and Recordkeeping** [15A NCAC 02Q .0308(a)]

**Regenerative Thermal Oxidizer and Regenerative Catalytic Oxidizer**

- e. The Permittee shall install, calibrate, operate, maintain, and inspect a continuous temperature monitoring, and recording system, in accordance with manufacturer's recommendations, for the regenerative thermal oxidizer and regenerative catalytic oxidizer (ID Nos. CD-RTO-1 and CD-RCO) to monitor the temperature in the combustion chamber (the second half of the oxidizer away from the flame zone) to ensure the average combustion temperature does not drop below the temperature range established during the performance test.
- f. The Permittee shall develop and maintain a written malfunction plan for the temperature monitoring and recording system that describes, in detail, the operating procedures for periods of malfunction and a protocol to address malfunctions so that corrective actions can immediately be investigated. The malfunction plan shall identify malfunctions, as described by the manufacturer, and ensure the operators are prepared to correct such malfunctions as soon as practical. The Permittee shall keep any necessary parts for routine repairs of the temperature monitoring and recording system readily available.
- g. The Permittee shall perform periodic inspection and maintenance for the oxidizers as recommended by the manufacturer. At a minimum, the Permittee shall perform an annual internal inspection of the primary heat exchanger and associated inlet/outlet valves of the control device to ensure structural integrity.
- h. The process rate and hardwood/softwood mix shall be recorded in a monthly log kept on site.

The results of the calculations and the total amount of VOC, NO<sub>x</sub>, and CO emissions shall be recorded monthly in a logbook (written or electronic format) and made available to an authorized representative upon request.

- i. For the dryer system, GHG (CO<sub>2</sub>e) emissions shall be calculated on a monthly basis and compliance demonstrated using the applicable Part 98 emission factors. Compliance shall be documented on a 12-month rolling basis.

**Reporting** [15A NCAC 02Q .0308(a)]

- j. The Permittee shall submit a semi-annual summary report, acceptable to the Regional Air Quality Supervisor, of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December, and July 30 of each calendar year for the preceding six-month period between January and June. The report shall contain the following:

- i. The monthly VOC, NO<sub>x</sub>, and CO emissions for the previous 17 months. The emissions must be calculated for each of the 12-month periods over the previous 17 months.
- ii. A report indicating and explaining all instances of the average minimum regenerative thermal oxidizer and regenerative catalytic oxidizer combustion chamber temperature falling below the temperature range established during the performance test or noting that no such instances have occurred.
- k. All instances of deviations from the requirements of this permit must be clearly identified.

**3. 15A NCAC 02Q .0207: ANNUAL EMISSIONS REPORTING**

The Permittee shall report by **June 30** of each year the actual emissions of each air pollutant listed in 15A NCAC 02Q .0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form as may be established by the Director. The accuracy of the report shall be certified by the responsible official of the facility.

**4. 15A NCAC 02Q .0304: APPLICATIONS**

The Permittee, at least 90 days prior to the expiration date of this permit, shall request permit renewal by letter in accordance with 15A NCAC 02Q .0304(d) and (f). Pursuant to 15A NCAC 02Q .0203(i), no permit application fee is required for renewal of an existing air permit. The renewal request should be submitted to the Regional Supervisor, DAQ.

**5. 15A NCAC 02Q .0504: OPTION FOR OBTAINING CONSTRUCTION AND OPERATION PERMIT**

The Permittee shall file a Title V Air Quality Permit Application pursuant to 15A NCAC 02Q .0504. to modify the construction and operation permit on or before **12 months after commencing operation of any of the sources listed in this permit.**

## **SECTION 3 - GENERAL CONDITIONS**

1. In accordance with G.S. 143-215.108(c)(1), TWO COPIES OF ALL DOCUMENTS, REPORTS, TEST DATA, MONITORING DATA, NOTIFICATIONS, REQUESTS FOR RENEWAL, AND ANY OTHER INFORMATION REQUIRED BY THIS PERMIT shall be submitted to:

Heather Carter  
Regional Air Quality Supervisor  
North Carolina Division of Air Quality  
Fayetteville Regional Office  
Systel Building  
225 Green Street, Suite 714  
Fayetteville, NC 28301-5043  
(910) 433-3300

For identification purposes, each submittal should include the facility name as listed on the permit, the facility identification number, and the permit number.

2. RECORDS RETENTION REQUIREMENT - In accordance with 15A NCAC 2D .0605, any records required by the conditions of this permit shall be kept on site and made available to DAQ personnel for inspection upon request. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. These records must be kept on site for a minimum of 2 years, unless another time period is otherwise specified.
3. ANNUAL FEE PAYMENT - Pursuant to 15A NCAC 2Q .0203(a), the Permittee shall pay the annual permit fee within 30 days of being billed by the DAQ. Failure to pay the fee in a timely manner will cause the DAQ to initiate action to revoke the permit.

4. EQUIPMENT RELOCATION - In accordance with 15A NCAC 2Q .0301, a new air permit shall be obtained by the Permittee prior to establishing, building, erecting, using, or operating the emission sources or air cleaning equipment at a site or location not specified in this permit.
5. REPORTING REQUIREMENT - In accordance with 15A NCAC 2Q .0309, any of the following that would result in previously unpermitted, new, or increased emissions must be reported to the Regional Supervisor, DAQ:
  - a. changes in the information submitted in the application regarding facility emissions;
  - b. changes that modify equipment or processes of existing permitted facilities; or
  - c. changes in the quantity or quality of materials processed.

If appropriate, modifications to the permit may then be made by the DAQ to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.

6. In accordance with 15A NCAC 2Q .0309, this permit is subject to revocation or modification by the DAQ upon a determination that information contained in the application or presented in the support thereof is incorrect, conditions under which this permit was granted have changed, or violations of conditions contained in this permit have occurred. In accordance with G.S. 143-215.108(c)(1), the facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air cleaning device(s) and appurtenances.
7. In accordance with G.S. 143-215.108(c)(1), this permit is nontransferable by the Permittee. Future owners and operators must obtain a new air permit from the DAQ.
8. In accordance with G.S. 143-215.108(c)(1), the issuance of this permit in no way absolves the Permittee of liability for any potential civil penalties which may be assessed for violations of State law which have occurred prior to the effective date of this permit.
9. In accordance with G.S. 143-215.108(c)(1), this permit does not relieve the Permittee of the responsibility of complying with all applicable requirements of any Federal, State, or Local water quality or land quality control authority.
10. In accordance with 15A NCAC 2D .0605, reports on the operation and maintenance of the facility shall be submitted by the Permittee to the Regional Supervisor, DAQ at such intervals and in such form and detail as may be required by the DAQ. Information required in such reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and preventive maintenance schedules.
11. A violation of any term or condition of this permit shall subject the Permittee to enforcement pursuant to G.S. 143-215.114A, 143-215.114B, and 143-215.114C, including assessment of civil and/or criminal penalties.
12. Pursuant to North Carolina General Statute 143-215.3(a)(2), no person shall refuse entry or access to any authorized representative of the DAQ who requests entry or access for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

13. In accordance with G.S. 143-215.108(c)(1), this permit does not relieve the Permittee of the responsibility of complying with any applicable Federal, State, or Local requirements governing the handling, disposal, or incineration of hazardous, solid, or medical wastes, including the Resource Conservation and Recovery Act (RCRA) administered by the Division of Waste Management.
14. PERMIT RETENTION REQUIREMENT - In accordance with 15A NCAC 2Q .0110, the Permittee shall retain a current copy of the air permit at the site. The Permittee must make available to personnel of the DAQ, upon request, the current copy of the air permit for the site.
15. CLEAN AIR ACT SECTION 112(r) REQUIREMENTS - Pursuant to 15A NCAC 2D .2100 "Risk Management Program," if the Permittee is required to develop and register a risk management plan pursuant to Section 112(r) of the Federal Clean Air Act, then the Permittee is required to register this plan with the USEPA in accordance with 40 CFR Part 68.
16. PREVENTION OF ACCIDENTAL RELEASES - GENERAL DUTY - Pursuant to Title I Part A Section 112(r)(1) of the Clean Air Act "Hazardous Air Pollutants - Prevention of Accidental Releases - Purpose and General Duty," although a risk management plan may not be required, if the Permittee produces, processes, handles, or stores any amount of a listed hazardous substance, the Permittee has a general duty to take such steps as are necessary to prevent the accidental release of such substance and to minimize the consequences of any release. **This condition is federally-enforceable only.**
17. GENERAL EMISSIONS TESTING AND REPORTING REQUIREMENTS - If emissions testing is required by this permit, or the DAQ, or if the Permittee submits emissions testing to the DAQ in support of a permit application or to demonstrate compliance, the Permittee shall perform such testing in accordance with 15A NCAC 2D .2600 and follow all DAQ procedures including protocol approval, regional notification, report submittal, and test results approval.

Permit issued this the 14<sup>th</sup> day of January, 2019.

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION



for William D. Willets, P.E., Chief, Permitting Section  
Division of Air Quality, NCDEQ  
By Authority of the Environmental Management Commission

Air Permit No. 10365R03

July 31, 2003

MEMORANDUM

SUBJECT: Request for Guidance on the Definition of Fuel Conversion Plants for Purposes of Prevention of Significant Deterioration (PSD)

FROM: Racqueline Shelton  
Group Leader  
Integrated Implementation Group C-339-03

TO: Guy Donaldson  
Acting Chief  
Air Permits Section (6PD-R)

Your June 17, 2003, memorandum requests assistance in making an official determination regarding the definition of the PSD source category “fuel conversion plants” found in 40 CFR Subpart 52.21. Stationary sources considered “fuel conversion plants” have a 100 tpy major source threshold for PSD applicability purposes. Specifically, you ask if the classification of “fuel conversion plants” applies to off-shore gas delivery systems that will vaporize liquefied natural gas (LNG) for delivery to a downstream infrastructure. The issue regards two project proposals you are reviewing, including the Chevron Texaco, Port Pelican Terminal that is proposed as SIC Code 4491, a marine cargo handling facility where LNG is transferred from ships to pipelines. We have reviewed your request, your suggested interpretation, the legislative history on the issue, and prior EPA guidance, including EPA’s memorandum dated May 26, 1992, entitled “Applicability of Prevention of Significant Deterioration (PSD) and New Source Performance Standards (NSPS) to the Cleveland Electric, Incorporated, Plant in Willoughby, Ohio” from Edward J. Lillis, Chief Air Programs Branch to George T. Czerniak, Chief Air Enforcement Branch, Region V. Based on this information and as discussed below, we conclude that the process of vaporization of LNG to natural gas at these sources does not qualify these sources as “fuel conversion plants” under the Federal PSD rules at 40 CFR 52.21(b)(1)(i)(a) and (iii)(q).

It is our understanding that the vaporization of LNG, which is a change of state from a liquid to a gas, occurs at temperatures above -260 degrees F. As a result, LNG vaporizes naturally at ambient temperatures and that indirect contact with seawater, which is warmer than LNG, is used to speed up the vaporization. We understand that vaporization of LNG occurs without the need for chemical or process change that generally occurs at other sources that EPA



considers as “fuel conversion plants”(e.g., coal gasification, oil shale processing , conversion of municipal waste to fuel gas, processing of sawdust into pellets) under the PSD rules.

The vaporization of LNG to natural gas differs from the fuel conversion processes discussed in EPA’s memorandum regarding Cleveland Electric since the vaporization would occur naturally at ambient conditions without additional processing. Our view is that the PSD rules are not intended to include the vaporization of LNG to natural gas in the source category of “fuel conversion plants”

If you have any questions please contact me or Mike Sewell of this group at (919) 541-0873.

cc: Regional Air Program Managers  
Teresa Dykes OECA  
Carol Holmes OGC  
John Averbeck OGC

Teresa Dykes of OECA and Jonathan Averbeck of OGC concur.

ROY COOPER  
Governor

MICHAEL S. REGAN  
Secretary

MICHAEL ABRACZINSKAS  
Director



NORTH CAROLINA  
Environmental Quality

October 2, 2019

Mr. Steven Schaar  
Plant Manager  
Enviva Pellets Sampson, LLC  
5 Connector Road, US 117  
Faison, NC 28341

SUBJECT: Air Quality Permit No. 10386R04  
Facility ID: 8200152  
Enviva Pellets Sampson, LLC  
Faison, North Carolina  
Sampson County  
Fee Class: Title V  
PSD Status: Major

Dear Mr. Schaar:

In accordance with your complete Prevention of Significant Deterioration (PSD) permit application received April 3, 2018, and State Renewal application received August 2, 2019, we are forwarding herewith Air Quality Permit No. 10386R04 to Enviva Pellets Sampson, LLC, 5 Connector Road, US 117, Faison, North Carolina, authorizing the construction and operation, of the emission source(s) and associated air pollution control device(s) specified herein. Additionally, any emissions activities determined from your Air Quality Permit Application as being insignificant per 15A North Carolina Administrative Code 02Q .0503(8) have been listed for informational purposes as an "ATTACHMENT."

As the designated responsible official, it is your responsibility to review, understand, and abide by all of the terms and conditions of the attached permit. It is also your responsibility to ensure that any person who operates any emission source and associated air pollution control device subject to any term or condition of the attached permit reviews, understands, and abides by the condition(s) of the attached permit that are applicable to that particular emission source.

If any parts, requirements, or limitations contained in this Air Quality Permit are unacceptable to you, you have the right to request a formal adjudicatory hearing within 30 days following receipt of this permit, identifying the specific issues to be contested. This hearing request must be in the form of a written petition, conforming to NCGS (North Carolina General Statutes) 150B-23, and filed with both the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, North Carolina 27699-6714 and the Division of Air Quality, Permitting Section, 1641 Mail Service Center, Raleigh, North Carolina 27699-1641. The form for requesting a formal adjudicatory hearing may be obtained upon request from the Office of Administrative Hearings. Please note that this permit will be stayed in its entirety upon



North Carolina Department of Environmental Quality | Division of Air Quality  
217 West Jones Street | 1641 Mail Service Center | Raleigh, North Carolina 27699-1641  
919.707.8400

receipt of the request for a hearing. Unless a request for a hearing is made pursuant to NCGS 150B-23, this Air Quality Permit shall be final and binding 30 days after issuance.

You may request modification of your Air Quality Permit through informal means pursuant to NCGS 150B-22. This request must be submitted in writing to the Director and must identify the specific provisions or issues for which the modification is sought. Please note that this Air Quality Permit will become final and binding regardless of a request for informal modification unless a request for a hearing is also made under NCGS 150B-23.

The construction of new air pollution emission source(s) and associated air pollution control device(s), or modifications to the emission source(s) and air pollution control device(s) described in this permit must be covered under an Air Quality Permit issued by the Division of Air Quality prior to construction unless the Permittee has fulfilled the requirements of NCGS 143-215.108A(b) and received written approval from the Director of the Division of Air Quality to commence construction. Failure to receive an Air Quality Permit or written approval prior to commencing construction is a violation of NCGS 143-215.108A and may subject the Permittee to civil or criminal penalties as described in NCGS 143-215.114A and 143-215.114B.

Sampson County has triggered increment tracking under PSD for PM10, PM2.5, and NOx. This modification will result in a decrease of 0.023 pounds per hour of PM10, a decrease of 4.6 pounds per hour of PM2.5, and a decrease of 0.091 pounds per hour of NOx.

This Air Quality Permit shall be effective from October 2, 2019 until September 30, 2027, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein. Should you have any questions concerning this matter, please contact Betty Gatano, P.E., at (919) 707-8736 or [Betty.Gatano@ncdenr.gov](mailto:Betty.Gatano@ncdenr.gov).

Sincerely yours,



William D. Willets, P.E., Chief, Permitting Section  
Division of Air Quality, NCDEQ

c: Kelly Fortion, EPA Region 4  
Fayetteville Regional Office  
Central Files  
Connie Horne (cover letter only)

## ATTACHMENT

### Insignificant Activities per 15A NCAC 02Q .0503(8)

| <b>Emission Source ID No.</b>                              | <b>Emission Source Description</b>                      |
|------------------------------------------------------------|---------------------------------------------------------|
| <b>IES-GWH<br/>PSD</b>                                     | Green wood handling and sizing operations               |
| <b>IES-BARKHOG<br/>PSD</b>                                 | Bark Hog                                                |
| <b>IES-TK-1<br/>PSD</b>                                    | Diesel fuel storage tank (up to 2,500 gallons capacity) |
| <b>IES-TK-2<br/>PSD</b>                                    | Diesel fuel storage tank (up to 1,000 gallons capacity) |
| <b>IES-TK-3<br/>PSD</b>                                    | Diesel fuel storage tank (up to 2,500 gallons capacity) |
| <b>IES-GWSP-1 through<br/>IES-GWSP-4<br/>PSD</b>           | Four (4) green wood storage piles                       |
| <b>IES-BFSP-1 and IES-BFSP-2<br/>PSD</b>                   | Two (2) bark fuel storage piles                         |
| <b>IES-DEBARK-1<br/>PSD</b>                                | Debarker                                                |
| <b>IES-CHIP-1<br/>PSD</b>                                  | Log chipping                                            |
| <b>IES-DRYSHAVE<br/>PSD</b>                                | Dry shaving material handling                           |
| <b>IES-BFB<br/>PSD</b>                                     | Bark fuel bin                                           |
| <b>IES-PAVEDROADS<br/>PSD</b>                              | Paved roads                                             |
| <b>IES-EG<br/>NSPS Subpart IIII<br/>MACT Subpart ZZZZ</b>  | 689 HP diesel-fired emergency generator                 |
| <b>IES-FWP<br/>NSPS Subpart IIII<br/>MACT Subpart ZZZZ</b> | 131 HP diesel-fired fire water pump                     |

1. Because an activity is insignificant does not mean that the activity is exempted from an applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement.
2. When applicable, emissions from stationary source activities identified above shall be included in determining compliance with the permit requirements for toxic air pollutants under 15A NCAC 02D .1100 "Control of Toxic Air Pollutants" or 02Q .0711 "Emission Rates Requiring a Permit".
3. For additional information regarding the applicability of MACT or GACT see the DAQ page titled "Specific Permit Conditions Regulatory Guide." The link to this site is as follows: <http://deq.nc.gov/about/divisions/air-quality/air-quality-permits/specific-permit-conditions-regulatory-guide>.

## Summary of Changes to Permit

The following changes were made to Enviva Pellets Sampson, LLC, Sampson, NC., Air Permit No. 10386R03.

| Pages                         | Section                     | Description of Changes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-------------------------------|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Cover and throughout          | --                          | Updated all dates and permit revision numbers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Insignificant Activities list | --                          | <ul style="list-style-type: none"> <li>Added log chipping (ID No. IES-CHIP-1).</li> <li>Added the bark hog (ID No. IES-BARKHOG).</li> <li>Removed the dry wood handling and sizing operations (ID No. IES-DWHS).</li> <li>Added two greenwood storage piles (ID No. IES-GWSP-3 and -4).</li> <li>Added two bark fuel storage piles (ID No. IES-BFSP-1 and -2).</li> <li>Added dry shaving materials handling (ID No. IES-DRYSHAVE).</li> <li>Removed greenwood fuel bin (ID No. IES-GWFB).</li> <li>Added bark fuel bin (ID No. IES-BFB).</li> <li>Added paved roads (ID No. IES-PAVEDROADS)</li> <li>Reformatted listing for the emergency generator (ID No. IES-EG) and the fire water pump (ID No. IES-FWP).</li> <li>Added the "PSD" label to all applicable equipment.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 3                             | Section 1 – Equipment Table | <ul style="list-style-type: none"> <li>Changed reference to bagfilters and bin vent filters to baghouses and renamed control devices accordingly.</li> <li>Removed log chipping (ID No. ES-CHIP-1) and moved emission source to the insignificant activities list.</li> <li>Removed the bark hog (ID No. ES-BARKHOG) and moved emission source to the insignificant activities list.</li> <li>Removed baghouses (ID Nos. CD-GHM-BH-1 through -3) as control devices for the green wood hammermills (ID Nos. ES-GHM-1 through -3). The WESP (ID No. CD-WESP) and the regenerative thermal oxidizer (RTO) (ID No. RTO) will be used as PM, VOC, and HAP control for the green wood hammermills.</li> <li>Removed the cyclones (ID Nos. CD-DC1 through DC4) as control devices for the dryer (ID No. ES-DRYER). These cyclones are used for product recovery rather than as control devices. The WESP (ID No. CD-WESP) and the RTO (ID No. RTO) will be used as PM, VOC, and HAP control for the dryer.</li> <li>Added RTO (ID No. CD-RTO) as control on the dryer (ID No. ES-DRYER).</li> <li>Added a furnace bypass (ID No. ES-FBYPASS) and a dryer bypass (ID No. ES-DBYPASS).</li> <li>Added dried wood handling operations (ID No. ES-DWH) controlled by two baghouses (ID No. CD-DWH-BH-1 and -2).</li> <li>Removed the cyclones (ID Nos. CD-HM-CYC-1 through -8) on the dry hammermills (ID No. ES-HM-1 through -8). These cyclones are used for product recovery rather than as control devices. The baghouses (ID Nos. CD-HM-BH1 through 8) are used as PM control for the dry hammermills.</li> </ul> |

| Pages   | Section                                 | Description of Changes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------|-----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3       | Section 1 – Equipment Table (continued) | <ul style="list-style-type: none"> <li>Added hammermill conveying system (ID No. ES-HMC) controlled by a baghouse (ID No. CD-HMC-BH).</li> <li>Added additive handling and storage (ID No. ES-ADD) controlled by a baghouse (ID No. CD-ADD-BH).</li> <li>Changed the name of the pellet fine bins (ID No. ES-PFB) to the pellet cooler HP fines relay system (ID No. ES-PCHP) controlled by baghouse (ID No. CD-PCHP-BH), to reflect the nomenclature at the facility.</li> <li>Added references to presses to the pellet coolers (ID Nos. ES-CLR-1 through -6).</li> <li>Changed the name of the pellet cooler recirculation (ID No. ES-PCR) to the pellet cooler LP fines relay system (ID No. ES-PCLP) controlled by a baghouse (ID No. CD-PCLP-BH), to reflect the nomenclature at the facility.</li> </ul> |
| 5       | 2.1 A Equipment List                    | Updated and reformatted equipment list.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 6       | 2.1 A.1.b                               | Removed requirements to test WESP (ID No. WESP) because this requirement has been met. Replaced with shell testing language.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| --      | 2.1 A.1.c (old)                         | Removed requirement for the facility to maintain process rates. This requirement is typically for emission sources with no controls. All the permitted emission sources of PM are controlled.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 6       | 2.1 A.1.c (new)                         | Added testing requirements to demonstrate compliance with 15A NCAC 02D .0515 for the dryer (ID No. ES-DRYER), green wood hammermills (ID Nos. ES-GHM-1, ES-GHM-2, and ES-GHM-3), dry hammermills (ID No. ES-HM-1 through -8), and pellet presses and pellet coolers (ID Nos. ES-CLR-1 through ES-CLR-6).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 6 – 7   | 2.1 A.1.d                               | Specified that each PM emission source shall be controlled by baghouse or cyclone.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 7       | 2.1 A.1.f through i                     | Clarified the inspection, maintenance, and operating requirements of the WESP (ID No. CD-WESP) and RTO (ID No. CD-RTO) for PM control from the dryer (ID No. ES-DRYER) and green wood hammermills (ID No. ES-GHM-1 through -3).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 7       | 2.1 A.1.k                               | Added semiannual reporting requirement.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 8       | 2.1 A.3.c                               | Added requirement to re-establish normal VE after exhaust from the green wood hammermills has been rerouted to the WESP (ID No. CD-WESP) and the RTO (ID No. CD-RTO).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 9       | 2.1 A.3.e                               | Added semiannual reporting requirement.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 9 -10   | 2.1 A.4                                 | Modified the permitting language for the 112(g), Case-by-Case, MACT.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 11 – 16 | 2.2 A.1                                 | <ul style="list-style-type: none"> <li>Updated BACT emission limits and controls for the Softwood Expansion Project (SWEP).</li> <li>Removed footnote and permit language stating that the BACT emission limits do not apply during startup, shutdown, or malfunction (SSM). The emission limits do apply during SSM and DAQ has added work practice standards and operating limits to the permit to ensure compliance.</li> <li>Updated requirements to reflect revised emission limits and BACT.</li> </ul>                                                                                                                                                                                                                                                                                                   |
| 16      | 2.2 A.2                                 | Added condition for reporting of excess emissions under 15A NCAC 02D .0535.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 17      | 2.2 A.3                                 | Added condition for 15A NCAC 02D .0540, Particulates from Fugitive Dust Emission Sources.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 17      | 2.2 A.4                                 | Added condition for 15A NCAC 02D .1806, Control and Prohibition of Odorous Emissions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 17      | 2.2 A.5                                 | Added condition for 15A NCAC 02Q .0207, Annual Emissions Reporting, requiring Permittee to submit emissions inventory annually.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

| <b>Pages</b> | <b>Section</b> | <b>Description of Changes</b>                                                                                                                                                                                                             |
|--------------|----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 17           | 2.2 A.6        | Added condition for 15A NCAC 02Q .0304, Applications, requiring Permittee to submit permit renewal at least 90 days from permit expiration date.                                                                                          |
| 18           | 2.2 A.7        | Added condition for 15A NCAC 02Q .0504, Option for Obtaining Construction and Operation Permit, requiring Permittee to submit amended Title V permit application within 12 months of operating any of the new sources or control devices. |



State of North Carolina  
Department of Environmental Quality  
Division of Air Quality

## AIR QUALITY PERMIT

| Permit No. | Replaces Permit No.(s) | Effective Date  | Expiration Date    |
|------------|------------------------|-----------------|--------------------|
| 10386R04   | 10386R03               | October 2, 2019 | September 30, 2027 |

Until such time as this permit expires or is modified or revoked, the below named Permittee is permitted to construct and operate the emission source(s) and associated air pollution control device(s) specified herein, in accordance with the terms, conditions, and limitations within this permit. This permit is issued under the provisions of Article 21B of Chapter 143, General Statutes of North Carolina as amended, and Title 15A North Carolina Administrative Codes (15A NCAC), Subchapters 02D and 02Q, and other applicable Laws.

Pursuant to Title 15A NCAC, Subchapter 02Q, the Permittee shall not construct, operate, or modify any emission source(s) or air pollution control device(s) without having first submitted a complete Air Quality Permit Application to the permitting authority and received an Air Quality Permit, except as provided in this permit.

**Permittee:** **Enviva Pellets Sampson, LLC**  
**Facility ID:** **8200152**

**Facility Site Location:** **5 Connector Road, US 117**  
**City, County, State, Zip:** **Faison, Sampson County, North Carolina, 28341**

**Mailing Address:** **5 Connector Road, US 117**  
**City, State, Zip:** **Faison, North Carolina, 28341**

**Application Number:** **8200152.18A and 8200152.19A**  
**Complete Application Date:** **April 3, 2018 and August 2, 2019**

**Primary SIC Code:** **2499**

**Division of Air Quality,**  
**Regional Office Address:** **Fayetteville Regional Office**  
**Systel Building**  
**225 Green Street, Suite 714**  
**Fayetteville, North Carolina, 28301**



## Table of Contents

|            |                                                                                                                                                                   |
|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SECTION 1: | PERMITTED EMISSION SOURCE (S) AND ASSOCIATED AIR POLLUTION CONTROL DEVICE (S) AND APPURTENANCES                                                                   |
| SECTION 2: | SPECIFIC LIMITATIONS AND CONDITIONS                                                                                                                               |
| 2.1-       | Emission Source(s) Specific Limitations and Conditions (Including specific requirements, testing, monitoring, recordkeeping, and reporting requirements)          |
| 2.2-       | Multiple Emission Source(s) Specific Limitations and Conditions (Including specific requirements, testing, monitoring, recordkeeping, and reporting requirements) |
| SECTION 3: | GENERAL PERMIT CONDITIONS                                                                                                                                         |

## SECTION 1- PERMITTED EMISSION SOURCE (S) AND ASSOCIATED AIR POLLUTION CONTROL DEVICE (S) AND APPURTENANCES

The following table contains a summary of all permitted emission sources and associated air pollution control devices and appurtenances:

| <b>Emission Source ID No.</b>                                          | <b>Emission Source Description</b>                                           | <b>Control Device ID No.</b>   | <b>Control Device Description</b>                                                                                                                                                                                  |
|------------------------------------------------------------------------|------------------------------------------------------------------------------|--------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ES-GHM-1, ES-GHM-2, ES-GHM-3<br><b>PSD</b><br><b>Case-by-Case MACT</b> | Three (3) green wood hammermills                                             | CD-WESP<br><br>CD-RTO          | One wet electrostatic precipitator (29,904 square feet of collector plate area) in series with<br><br>one natural gas/propane-fired regenerative thermal oxidizer (maximum firing rate of 32 million Btu per hour) |
| ES-DRYER<br><b>PSD</b><br><b>Case-by-Case MACT</b>                     | Wood-fired direct heat drying system (250.4 million Btu per hour heat input) | CD-WESP<br><br>CD-RTO          | One wet electrostatic precipitator (29,904 square feet of collector plate area) in series with<br><br>one natural gas/propane-fired regenerative thermal oxidizer (maximum firing rate of 32 million Btu per hour) |
| ES-FBYPASS<br><b>PSD</b>                                               | Furnace bypass                                                               | N/A                            | N/A                                                                                                                                                                                                                |
| ES-DBPYASS<br><b>PSD</b>                                               | Dryer bypass                                                                 | N/A                            | N/A                                                                                                                                                                                                                |
| ES-DWH<br><b>PSD</b><br><b>Case-by-Case MACT</b>                       | Dried wood handling operations                                               | CD-DWH-BH-1 and<br>CD-DWH-BH-2 | Two (2) baghouses (377 square feet of filter area, each)                                                                                                                                                           |
| ES-HM-1 through ES-HM-8<br><b>PSD</b><br><b>Case-by-Case MACT</b>      | Eight (8) dry hammermills                                                    | CD-HM-BH1 through<br>CD-HM-BH8 | Eight (8) baghouses (2,168 square feet of filter area each)                                                                                                                                                        |
| ES-HMC<br><b>PSD</b>                                                   | Hammermill conveying system                                                  | CD-HMC-BH                      | One baghouse (377 square feet of filter area)                                                                                                                                                                      |
| ES-PMFS<br><b>PSD</b>                                                  | Pellet mill feed silo                                                        | CD-PMFS-BH                     | One baghouse (377 square feet of filter area)                                                                                                                                                                      |
| ES-ADD<br><b>PSD</b>                                                   | Additive Handling and Storage                                                | CD-ADD-BH                      | One baghouse (942 square feet of filter area)                                                                                                                                                                      |
| ES-HMA and ES-PCHP<br><b>PSD</b><br><b>Case-by-Case MACT</b>           | Hammermill area and pellet cooler HP fines relay system                      | CD-PCHP-BH                     | One baghouse (1,520 square feet of filter area)                                                                                                                                                                    |

| <b>Emission Source ID No.</b>                                       | <b>Emission Source Description</b>                                                                                    | <b>Control Device ID No.</b> | <b>Control Device Description</b>                                                 |
|---------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|------------------------------|-----------------------------------------------------------------------------------|
| ES-CLR-1 through ES-CLR-6<br><b>PSD</b><br><b>Case-by-case MACT</b> | Six (6) pellet coolers and twelve (12) pellet presses (two (2) pellet presses are associated with each pellet cooler) | CD-CLR-1 through CD-CLR-6    | Six (6) simple cyclones (54 inches in diameter) installed one each on the coolers |
| ES-PCLP<br><b>PSD</b>                                               | Pellet cooler LP fines relay system                                                                                   | CD-PCLP-BH                   | One baghouse (942 square feet of filter area)                                     |
| ES-PSTB<br><b>PSD</b>                                               | Pellet sampling transfer bin                                                                                          | CD-PSTB-BH                   | One baghouse (377 square feet of filter area)                                     |
| ES-FPH, ES-PB-1 through ES-PB-4, ES-PL-1 and ES-PL-2<br><b>PSD</b>  | Finished product handling, four (4) pellet load-out bins, and two (2) pellet mill loadouts                            | CD-FPH-BH                    | One baghouse (4,842 square feet of filter area)                                   |

## **SECTION 2 - SPECIFIC LIMITATIONS AND CONDITIONS**

### **2.1- Emission Source(s) and Control Devices(s) Specific Limitations and Conditions**

The emission source(s) and associated air pollution control device(s) and appurtenances listed below are subject to the following specific terms, conditions, and limitations, including the testing, monitoring, recordkeeping, and reporting requirements as specified herein:

- A. Three (3) green wood hammermills (ID Nos. ES-GHM-1, ES-GHM-2 and ES-GHM-3) controlled by a wet electrostatic precipitator (ID No. CD-WESP) and a regenerative thermal oxidizer (ID No. CD-RTO)**

**Wood-fired direct heat drying system (ID No. ES-DRYER) controlled by a wet electrostatic precipitator (ID No. CD-WESP) and a regenerative thermal oxidizer (ID No. CD-RTO)**

**Furnace bypass (ID No. ES-FBYPASS) and dryer bypass (ID No. ES-DBYPASS)**

**Dry wood handling operations (ID No. ES-DWH) controlled by baghouses (ID Nos. CD-DWH-BH-1 and 2)**

**Eight (8) hammermills (ID Nos. ES-HM-1 through ES-HM-8) controlled by baghouses (ID Nos. CD-HM-BH1 through CD-HM-BH8)**

**Hammermill conveying system (ID No. ES-HMC) controlled by baghouse (ID No. CD-HMC-BH)**

**Hammermill area (ID No. ES-HMA) and pellet cooler HP fines relay system (ID No. ES-PCHP) controlled by a baghouse (ID No. CD-PCHP-BH)**

**Pellet mill feed silo (ID No. ES-PMFS) controlled by a baghouse (ID No. CD-PMFS-BH)**

**Pellet presses and pellet coolers (ID Nos. ES-CLR-1 through ES-CLR-6) controlled by cyclones (ID Nos. CD-CLR-1 through CD-CLR-6)**

**Pellet cooler LP fines relay system (ID No. ES-PCLP) controlled by a baghouse (ID No. CD-PCLP-BH)**

**Pellet sampling transfer bin (ID No. ES-PSTB) controlled by a baghouse (ID No. CD-PSTB-BH)**

**Finished product handling (ID No. ES-FPH), pellet load-out bins (ID Nos. ES-PB-1 through ES-PB-4), and pellet mill load-out (ID No. ES-PL-1 and ES-PL-2) controlled by a baghouse (ID No. CD-FPH-BH)**

The following table provides a summary of limits and standards for the emission source(s) described above:

| Regulated Pollutant                                                                                | Limits/Standards                                                                                                                                                                | Applicable Regulation                            |
|----------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| Particulate matter                                                                                 | $E = 4.10 \times P^{0.67}$ for $P < 30$ tph<br>$E = 55 \times P^{0.11} - 40$ for $P \geq 30$ tph<br>where, E = allowable emission rate (lb/hr)<br>P = process weight rate (tph) | 15A NCAC 02D .0515                               |
| Sulfur dioxide                                                                                     | <i>ID No. ES-DRYER only:</i><br>2.3 pounds per million Btu                                                                                                                      | 15A NCAC 02D .0516                               |
| Visible emissions                                                                                  | 20 percent opacity                                                                                                                                                              | 15A NCAC 02D .0521                               |
| Hazardous Air Pollutants                                                                           | See Section 2.1 A.4.                                                                                                                                                            | 15A NCAC 02D .1112<br>[112(g) Case-by-Case MACT] |
| PM/PM10/PM2.5<br>Nitrogen oxides<br>Volatile organic carbon<br>Carbon monoxide<br>Greenhouse gases | See Section 2.2 A.1.                                                                                                                                                            | 15A NCAC 02D .0530                               |

**1. 15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES**

- a. Emissions of particulate matter from these sources shall not exceed an allowable emission rate as calculated by the following equation:

$$E = 4.10 \times P^{0.67} \quad \text{for } P < 30 \text{ tph}$$

$$E = 55 \times P^{0.11} - 40 \quad \text{for } P \geq 30 \text{ tph}$$

Where E = allowable emission rate in pounds per hour  
P = process weight in tons per hour

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

**Testing** [15A NCAC 02Q .0308(a)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition 17.
- c. Under the provisions of North Carolina General Statute 143-215.108, the Permittee shall demonstrate compliance with emission limits in Section 2.1 A.1.a for the wood-fired direct heat drying system (**ID No. ES-DRYER**), green wood hammermills (**ID Nos. ES-GHM-1, ES-GHM-2, and ES-GHM-3**), dry hammermills (**ID Nos. ES-HM-1 through ES-HM-8**), and pellet presses and pellet coolers (**ID Nos. ES-CLR-1 through ES-CLR-6**). Testing shall be conducted as specified in Section 2.2 A.1.d.

**Monitoring** [15A NCAC 02Q .0308(a)]

*For baghouses and/or cyclones:*

- d. Particulate matter emissions shall be controlled as follows:
- i. Particulate matter emissions from the dry wood handling operations (**ID No. ES-DWH**) shall be controlled by baghouses (**ID Nos. CD-DWH-BH-1 and CD-DWH-2**);
  - iii. Particulate matter emissions from eight (8) hammermills (**ID Nos. ES-HM-1 through ES-HM-8**) shall be controlled by baghouses (**ID Nos. CD-HM-BH1 through CD-HM-BH8**);
  - iv. Particulate matter emissions from the hammermill conveying system (**ID No. ES-HMC**) shall be controlled by baghouse (**ID No. CD-HMC-BH**);

- v. Particulate matter emissions from the hammermill area (**ID No. ES-HMA**) and pellet cooler HP fines relay system (**ID No. ES-PCHP**) shall be controlled by baghouse (**ID No. CD-PCHP-BH**);
  - vi. Particulate matter emissions from the pellet mill feed silo (**ID No. ES-PMFS**) shall be controlled by baghouse (**ID No. CD-PMFS-BH**);
  - vii. Particulate matter emissions from the pellet presses and pellet coolers (**ID Nos. ES-CLR-1 through ES-CLR-6**) shall be controlled by cyclones (**ID Nos. CD-CLR-1 through CD-CLR-6**);
  - viii. Particulate matter emissions from pellet cooler LP fines relay system (**ID No. ES-PCLP**) shall be controlled by baghouse (**ID No. CD-PCLP-BH**);
  - ix. Particulate matter emissions from the pellet sampling transfer bin (**ID No. ES-PSTB**) shall be controlled by baghouse (**ID No. CD-PSTB-BH**); and
  - x. Particulate matter emissions from finished product handling (**ID No. ES-FPH**), pellet load-out bins (**ID Nos. ES-PB-1 through ES-PB-4**), and pellet mill load-out (**ID No. ES-PL-1 and ES-PL-2**) shall be controlled by baghouse (**ID No. CD-FPH-BH**).
- e. To ensure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there are no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:
- i. a monthly visual inspection of the system ductwork and material collection units for leaks; and
  - ii. an annual (for each 12-month period following the initial inspection) internal inspection of the baghouses' structural integrity.
- For wet electrostatic precipitator and regenerative thermal oxidizer:*
- f. Particulate matter emissions shall be controlled as follows:
- i. Particulate matter emissions from the green wood hammermills (**ID Nos. ES-GHM-1, ES-GHM-2 and ES-GHM-3**) shall be controlled by a wet electrostatic precipitator (**ID No. CD-WESP**) in series with a regenerative thermal oxidizer (**ID No. CD-RTO**).
  - ii. Particulate matter emissions from the wood-fired direct heat drying system (**ID No. ES-DRYER**) shall be controlled by a wet electrostatic precipitator (**ID No. CD-WESP**) in series with a regenerative thermal oxidizer (**ID No. CD-RTO**).
- g. To ensure compliance and effective operation of the wet electrostatic precipitator (**ID No. CD-WESP**), the Permittee shall:
- i. operate the wet electrostatic precipitator with at least the minimum number of grids operating during compliance testing specified in Section 2.1 A.1.c above;
  - ii. maintain the minimum secondary voltage and minimum current at the level established during compliance testing specified in Section 2.1 A.1.c above.
  - iii. monitor and record the secondary voltage and current for each grid of the precipitator daily. The daily observation must be made for each day of the calendar year period. The Permittee shall be allowed three (3) days of absent observations per semiannual period.
  - iv. The Permittee may re-establish any parametric operating value during periodic testing. Compliance with previously approved parametric operating values is not required during periodic required testing or other tests undertaken to re-establish parametric operating values by the Permittee. If the new parametric operating values re-established during periodic testing are more stringent, the Permittee shall submit a request to revise the value(s) in the permit at the same time the test report required pursuant to General Condition 17 is submitted. The permit revision will be processed pursuant to 15A NCAC 02Q .0514. If, during performance testing, the new parametric operating values are less stringent, the Permittee may request to revise the value(s) in the permit pursuant to 15A NCAC 02Q .0515.
- h. To ensure compliance, the Permittee shall perform inspections and maintenance on the wet electrostatic precipitator (**ID No. CD-WESP**) and the regenerative thermal oxidizer (**ID No. CD-RTO**), as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance

recommendations, or if there are no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:

- i. a monthly visual inspection of the system ductwork and material collection units for leaks;
- ii. an annual (for each 12-month period following the initial inspection) internal inspection of the heat transfer medium and associated inlet/outlet valves on the regenerative thermal oxidizer (**ID No. CD-RTO**); and
- iii. an annual (for each 12-month period following the initial inspection) internal inspection of the wet electrostatic precipitator (**ID No. CD-WESP**). This inspection must include (but is not limited to) the following:
  - (A) visual checks of critical components,
  - (B) checks for any equipment that does not alarm when de-energized, to ensure it is operational,
  - (C) checks for signs of plugging in the hopper and gas distribution equipment, and
  - (D) replacement of broken equipment as required.

**Recordkeeping** [15A NCAC 02Q .0308(a)]

- i. The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each inspection;
  - iii. the results of any maintenance performed on the control devices; and
  - iv. any variance from manufacturer's recommendations, if any, and corrections made.

**Reporting** [15A NCAC 02Q .0308(a), 15A NCAC 02D .0605(b)(3)]

- j. The Permittee shall submit the results of any maintenance performed on the wet electrostatic precipitator, regenerative thermal oxidizer, cyclones, and/or baghouses within 30 days of a written request by the DAQ.
- k. The Permittee shall submit a summary report of the monitoring and recordkeeping activities given in Sections 2.1 A.1.d through i above postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**2. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES**

- a. Emissions of sulfur dioxide from this source (**ID No. ES-DRYER**) shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard

**Testing** [15A NCAC 02Q .0308(a)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition 17.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 02Q .0308(a)]

- c. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from firing biomass in the wood-fired direct heat drying system (**ID No. ES-DRYER**).

**3. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from these sources shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.

**Testing** [15A NCAC 02Q .0308(a)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition 17.

**Monitoring** [15A NCAC 02Q .0308(a)]

- c. To ensure compliance, once a month the Permittee shall observe the emission points of the sources in Section 2.1 A for any visible emissions above normal. The monthly observation must be made for each month of the calendar year period to ensure compliance with this requirement. For the green wood hammermills (**ID Nos. ES-GHM-1, ES-GHM-2 and ES-GHM-3**) and wood-fired direct heat drying system (**ID No. ES-DRYER**), the Permittee shall establish “normal” in the first 30 days following the commencement of operation after exhaust from the green wood hammermills has been rerouted to the WESP (**ID No. CD-WESP**) and the RTO (**ID No. CD-RTO**). If visible emissions from the sources in Section 2.1 A are observed to be above normal, the Permittee shall either:
  - i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
  - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 A.3.a. above.

**Recordkeeping** [15A NCAC 02Q .0308(a)]

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
  - iii. the results of any corrective actions performed.

**Reporting** [15A NCAC 02Q .0308(a), 15A NCAC 02D .0605(b)(3)]

- e. The Permittee shall submit a summary report of the monitoring and recordkeeping activities given in Sections 2.1 A.3.c and d above postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**4. 15A NCAC 02D .1112: 112(g) CASE BY CASE MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY**

- a. The Permittee shall comply with all applicable provisions, including the notification, testing, reporting, recordkeeping, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 02D .1112, “Case-By-Case Maximum Achievable Control Technology,” and as promulgated in 40 CFR 63, including Subpart A “General Provisions.” The Permittee shall comply with the following:
  - i. For the wood pellet mill dryer (**ID No. ES-DRYER**), the Permittee shall use a low HAP emitting dryer design not requiring add-on control.
  - ii. Within six months of issuance of this permit (10386R04), the Permittee shall submit to DAQ an application requesting authorization for installation of a regenerative catalytic oxidizer or regenerative thermal oxidizer (RCO/RTO) to control HAP emissions from the pellet presses and pellet coolers (**ID Nos. ES-CLR-1 through ES-CLR-6**). Installation and startup of the control device shall be completed by no later than June 1, 2021, provided that, if a permit authorizing the same is not issued until after June 1, 2020, installation and startup of the control device shall be completed within twelve months of permit issuance. Initial compliance for the RCO/RTO shall be demonstrated in accordance with the future issued permit.
  - iii. Within six months of issuance of this permit (10386R04), the Permittee shall submit to DAQ an application requesting authorization for either of the following:



(A) the installation of an RCO/RTO to control VOC and HAP emissions from the dry hammermills **(ID Nos. ES-HM-1 through ES-HM-8)**, or

(B) an engineering solution that will result in an equivalent or greater reduction in VOC and HAP emissions from the dry hammermills.

Installation and startup of the control device or engineering solution shall be completed by no later than June 1, 2021, provided that, if a permit authorizing the same is not issued until after June 1, 2020, installation and startup of the control device shall be completed within twelve months of permit issuance. Initial compliance for the RCO/RTO or engineering solution shall be demonstrated in accordance with the future issued permit.

**Testing** [15A NCAC 02Q .0308(a)]

- b. **Initial Performance Tests** – Under the provisions of North Carolina General Statute 143-215.108, the Permittee shall establish emission factors for HAPs by conducting an initial performance test on the wood-fired direct heat drying system **(ID No. ES-DRYER)**, the green wood hammermills **(ID Nos. ES-GHM-1, ES-GHM-2, and ES-GHM-3)**, the dry hammermills **(ID Nos. ES-HM-1 through ES-HM-8)**, the dry wood handling operations **(ID Nos. ES-DWH)**, and the pellet presses and coolers **(ID Nos. ES-CLR-1 through ES-CLR-6)**. Initial testing shall be conducted in accordance with the following:

- i. The pollutants and emission sources to be tested during the initial performance test are listed in the following table:

| Emission Source                                                 | Pollutant       |
|-----------------------------------------------------------------|-----------------|
| Dryer system/green wood hammermills controlled via WESP and RTO | Acetaldehyde    |
| One pellet cooler cyclone                                       | Acrolein        |
| One dry hammermill baghouse                                     | Formaldehyde    |
| Dry wood handling operations                                    | Methanol        |
|                                                                 | Phenol          |
|                                                                 | Propionaldehyde |

- ii. Initial testing shall be conducted in accordance with Section 2.2 A.1.d.ii through vi. below.

- c. **Periodic Performance Tests** – Under the provisions of North Carolina General Statute 143-215.108, the Permittee shall establish emission factors for HAPs by conducting periodic performance tests on the wood-fired direct heat drying system **(ID No. ES-DRYER)**, the green wood hammermills **(ID Nos. ES-GHM-1, ES-GHM-2, and ES-GHM-3)**, the dry hammermills **(ID Nos. ES-HM-1 through ES-HM-8)**, and the pellet presses and coolers **(ID Nos. ES-CLR-1 through ES-CLR-6)**. Periodic testing shall be conducted in accordance with the following:

- i. The pollutants and emission sources to be tested during the periodic performance tests are listed in the following table:

| Emission Sources                                                | Pollutant       |
|-----------------------------------------------------------------|-----------------|
| Dryer system/green wood hammermills controlled via WESP and RTO | Acetaldehyde    |
| One pellet cooler cyclone                                       | Acrolein        |
| One dry hammermill baghouse                                     | Formaldehyde    |
|                                                                 | Methanol        |
|                                                                 | Phenol          |
|                                                                 | Propionaldehyde |

- ii. Periodic testing shall be conducted in accordance with Section 2.2 A.1.e.ii through xiv below.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 02Q .0308(a)]

- d. No monitoring recordkeeping, or reporting is required for any emission source subject to 112(g) Case-by-Case MACT.

## 2.2- Multiple Emission Source(s) Limitations and Conditions

### A. Facility-wide Emission Sources

The following table provides a summary of limits and standards for the emission source(s) describe above:

| Regulated Pollutant                                                                                | Limits/Standards                                                  | Applicable Regulation |
|----------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|-----------------------|
| PM/PM10/PM2.5<br>Nitrogen oxides<br>Volatile organic carbon<br>Carbon monoxide<br>Greenhouse gases | BACT Limits                                                       | 15A NCAC 02D .0530    |
| Fugitive dust                                                                                      | Minimize fugitive dust beyond property boundary                   | 15A NCAC 02D .0540    |
| Odor                                                                                               | State-enforceable only odor control                               | 15A NCAC 02D .1806    |
| N/A                                                                                                | Annual Emission Reporting due June 30                             | 15A NCAC 02Q .0207    |
| N/A                                                                                                | Permit renewal application due 90 days prior to permit expiration | 15A NCAC 02Q .0304    |
| N/A                                                                                                | Option for obtaining construction and operation permit            | 15A NCAC 02Q .0504    |

#### 1. 15A NCAC 02D .0530: PREVENTION OF SIGNIFICANT DETERIORATION

- a. The Permittee shall comply with all applicable provisions, including the notification, testing, reporting, recordkeeping, and monitoring requirements in accordance with 15A NCAC 02D .0530, "Prevention of Significant Deterioration of Air Quality" (PSD) as promulgated in 40 CFR 51.166.
- b. For PSD purposes, the following "Best Available Control Technology" (BACT) emissions limits shall not be exceeded:

| Emission Source                                        | Pollutant   | Control Technology or Work Practice | BACT Emission Limit               | Averaging Period |
|--------------------------------------------------------|-------------|-------------------------------------|-----------------------------------|------------------|
| Wood-fired Direct Heat Drying System (ID No. ES-DRYER) | NOx         | Good Combustion Practices           | 0.20 lb/million Btu               | 3-hour           |
|                                                        | CO          | Process Design                      | 0.21 lb/ million Btu              | 3-hour           |
|                                                        | GHG         | Good Operating Practices            | 230,000 tpy (CO <sub>2</sub> e)   | Annual           |
| Wood-fired Direct Heat Drying System (ID No. ES-DRYER) | VOC**       | RTO                                 | 0.15 lb/ODT                       | 3-hour           |
| Green Wood Hammermills (ID Nos. ES-GHM-1 to ES-GHM-3)  | PM/PM10/2.5 | WESP                                | 0.105 lb/ODT (filterable only)    | 3-hour           |
| Dry Hammermills (ID Nos. ES-HM-1 to ES-HM-8)           | VOC**       | Good Operating Procedures           | 0.60 lb/ODT                       | 3-hour           |
|                                                        | PM          | Baghouse                            | 0.004 gr/scf                      | 3-hour           |
|                                                        | PM10        |                                     | 0.004 gr/scf (filterable only)    | 3-hour           |
|                                                        | PM2.5       |                                     | 0.000014 gr/scf (filterable only) | 3-hour           |
| Hammermill Conveying System (ID No. ES-HMC)            | PM          | Baghouse                            | 0.004 gr/scf                      | 3-hour           |
| Dried Wood Handling (ID No. ES-DWH)                    | VOC**       | Good Operating Procedures           | 0.12 lb/ODT                       | 3-hour           |

| Emission Source                                                                                                     | Pollutant     | Control Technology or Work Practice                                                  | BACT Emission Limit                | Averaging Period |
|---------------------------------------------------------------------------------------------------------------------|---------------|--------------------------------------------------------------------------------------|------------------------------------|------------------|
|                                                                                                                     | PM            | Baghouses                                                                            | 0.004 gr/scf                       | 3-hour           |
| Pellet Presses and Coolers<br>(ID No. ES-CLR-1 to ES-CLR-6)                                                         | VOC**         | Good Operating Procedures                                                            | 1.74 lb/ODT                        | 3-hour           |
|                                                                                                                     | PM            | Cyclones - Proper Design and Good Operating Procedures                               | 0.04 gr/scf                        | 3-hour           |
|                                                                                                                     | PM10          |                                                                                      | 0.0057 gr/scf<br>(filterable only) | 3-hour           |
|                                                                                                                     | PM2.5         |                                                                                      | 0.0007 gr/scf<br>(filterable only) | 3-hour           |
| Pellet cooler LP Fines Relay System (ID No. ES-PCLP)                                                                | PM2.5/PM10/PM | Baghouse                                                                             | 0.004 gr/scf                       | 3-hour           |
| Pellet Sampling Transfer Bin (ID No. ES-PSTB)                                                                       | PM2.5/PM10/PM | Baghouse                                                                             | 0.004 gr/scf                       | 3-hour           |
| Hammermill Area/Pellet cooler HP Fines Relay System (ID Nos. ES-HMA and ES-PCHP)                                    | PM2.5/PM10/PM | Baghouse                                                                             | 0.004 gr/scf                       | 3-hour           |
| Pellet Mill Feed Silo (ID No. ES-PMFS)                                                                              | PM2.5/PM10/PM | Baghouse                                                                             | 0.004 gr/scf                       | 3-hour           |
| Finished Product Handling/Pellet Loadout Bins/Pellet Mill Loadouts<br>(ID Nos. ES-FPH, ES-PB-1 to 4/ ES-PL-1 and 2) | PM            | Baghouse                                                                             | 0.004 gr/scf                       | 3-hour           |
|                                                                                                                     | PM10          | Baghouse                                                                             | 0.004 gr/scf                       | 3-hour           |
|                                                                                                                     | PM2.5         | Baghouse                                                                             | 0.000014 gr/scf                    | 3-hour           |
| Paved Roads (ID No. IES-PAVEDROADS)                                                                                 | PM/PM10/PM2.5 | Combination of watering of paved roads, vehicle speed control, and good housekeeping | Not Applicable                     |                  |
| Green Wood Handling (ID No. IES-GWH)                                                                                | PM/PM10/PM2.5 | None                                                                                 | Not Applicable                     |                  |
| Green Wood Storage Piles (ID Nos. IES-GWSP-1 to IES-GWSP-4)                                                         | VOC           |                                                                                      |                                    |                  |
|                                                                                                                     | PM/PM10/PM2.5 |                                                                                      |                                    |                  |
| Bark Fuel Storage Piles (ID Nos. IES-BFSP-1 and IES-BFSP-2)                                                         | VOC           |                                                                                      |                                    |                  |
|                                                                                                                     | PM/PM10/PM2.5 |                                                                                      |                                    |                  |
| Bark Fuel Bin (ID No. IES-BFB)                                                                                      | PM/PM10/PM2.5 |                                                                                      |                                    |                  |
| Dry Shavings Material Handling (ID No. IES-DRYSHAVE)                                                                | PM            |                                                                                      |                                    |                  |
| Debarker (ID No. IES-DEBARK-1)                                                                                      | PM/PM10/PM2.5 |                                                                                      |                                    |                  |
| Log Chipping (ID No. IES-CHIP-1)                                                                                    | VOC           |                                                                                      |                                    |                  |
| Bark Hog (ID No. IES-BARKHOG)                                                                                       | VOC           | Good operation practices                                                             | Not Applicable                     |                  |
|                                                                                                                     | PM            |                                                                                      |                                    |                  |
| Diesel storage tanks (ID Nos. IES-TK1, IES-TK2, and IES-TK3)                                                        | VOC           | Good operation practices                                                             | Not Applicable                     |                  |

\* The VOC limit is expressed as alpha pinene basis per the procedures in EPA OTM 26.

**Notifications** [15A NCAC 02Q .0308(a)]

- c. The completion of the Softwood Expansion Project (SWEP) is defined as the replacement of pellet presses that allow throughput of up to 657,000 ODT/year on an annual basis and the rerouting of the exhaust from the green wood hammermills (**ID Nos. ES-GHM-1, ES-GHM-2, and ES-GHM-3**) to the wet electrostatic precipitator (**ID No. CD-WESP**) and the regenerative thermal oxidizer (**ID No. CD-RTO**). The Permittee shall notify the DAQ of the actual completion date of the SWEP postmarked within 15 days after such date.

**Testing** [15A NCAC 02Q .0308(a)]

- d. **Initial Performance Tests** – Under the provisions of North Carolina General Statute 143-215.108, the Permittee shall demonstrate compliance with the BACT emission limits in Section 2.2 A.1.b above by conducting an initial performance test on the wood-fired direct heat drying system (**ID No. ES-DRYER**), the green wood hammermills (**ID Nos. ES-GHM-1, ES-GHM-2, and ES-GHM-3**), the dry hammermills (**ID Nos. ES-HM-1 through ES-HM-8**), the dry wood handling operations (**ID Nos. ES-DWH**), and the pellet presses and coolers (**ID Nos. ES-CLR-1 through ES-CLR-6**). Initial testing shall be conducted in accordance with the following:
- i. The pollutants and emission sources to be tested during the initial performance test are listed in the following table:

| <b>Emission Sources</b>                                         | <b>Pollutant</b> |
|-----------------------------------------------------------------|------------------|
| Dryer system/green wood hammermills controlled via WESP and RTO | VOC              |
|                                                                 | PM/PM10/PM2.5    |
|                                                                 | NOx              |
|                                                                 | CO               |
| One pellet cooler cyclone                                       | VOC              |
|                                                                 | PM/PM10/PM2.5    |
| One dry hammermill baghouse                                     | VOC              |
|                                                                 | PM/PM10/PM2.5    |
| Dry wood handling operations                                    | VOC              |

- ii. The Permittee shall conduct initial compliance testing in accordance with a testing protocol approved by the DAQ.
- iii. The Permittee shall submit a protocol to DAQ at least 45 days prior to initial compliance testing and shall submit a notification of initial compliance testing at least 15 days in advance of the testing.
- iv. The RTO (**ID No. CD-RTO**) is comprised of two fireboxes, each containing two temperature probes. During the initial compliance test, the Permittee shall establish the minimum average firebox temperature for each of the two fireboxes comprising the regenerative thermal oxidizer (**ID No. CD-RTO**), for a total of two average temperatures per regenerative thermal oxidizer. "Average firebox temperature" means the average temperature of the two temperature probes in each firebox. The minimum average firebox temperature for each firebox shall be based upon the average temperature of the two temperature probes over the span of the test runs. Documentation for the minimum average firebox temperature for each firebox shall be submitted to the DAQ as part of the initial compliance test report.
- v. Initial compliance testing shall be completed as follows:
- (A) The Permittee shall be responsible for ensuring, within practicable limits, that the equipment or processes being tested are operated at or near the maximum normal production rate but at a rate not to exceed 71.71 ODT per hour (not to exceed 537,625 ODT per year on an annual basis).
- (B) Testing shall be conducted at the maximum normal operating softwood percentage, not to exceed 80% softwood.
- (C) Testing shall be completed and results submitted to the DAQ within 90 days of permit issuance, unless an alternate date is approved in advance by DAQ.
- vi. Additional initial compliance testing upon completion of the SWEP shall be completed as follows:

- (A) The Permittee shall be responsible for ensuring, within practicable limits, that the equipment or processes being tested are operated at or near the maximum normal production rate but at a rate not to exceed 120 ODT per hour (not to exceed 657,000 ODT per year on an annual basis).
  - (B) Testing shall be conducted at the maximum normal operating softwood percentage, not to exceed 80% softwood.
  - (C) Testing shall be completed and results submitted to the DAQ within 120 days completion of the construction of the SWEP, unless an alternate date is approved in advance by DAQ,
- e. **Periodic Performance Tests** – Under the provisions of North Carolina General Statute 143-215.108, the Permittee shall demonstrate compliance with the BACT emission limits in Section 2.2 A.1.b above by conducting periodic performance tests on the wood-fired direct heat drying system (**ID No. ES-DRYER**), the green wood hammermills (**ID Nos. ES-GHM-1, ES-GHM-2, and ES-GHM-3**), the dry hammermills (**ID Nos. ES-HM-1 through ES-HM-8**), and the pellet presses and coolers (**ID Nos. ES-CLR-1 through ES-CLR-6**). Periodic testing shall be conducted in accordance with the following:
- i. The pollutants and emission sources to be tested during the periodic performance tests are listed in the following table:

| Emission Sources                                                | Pollutant     |
|-----------------------------------------------------------------|---------------|
| Dryer system/green wood hammermills controlled via WESP and RTO | VOC           |
|                                                                 | PM/PM10/PM2.5 |
|                                                                 | NOx           |
|                                                                 | CO            |
| One pellet cooler cyclone                                       | VOC           |
|                                                                 | PM/PM10/PM2.5 |
| One dry hammermill baghouse                                     | VOC           |
|                                                                 | PM/PM10/PM2.5 |

- ii. The Permittee shall conduct periodic compliance testing in accordance with a testing protocol approved by the DAQ.
- iii. The Permittee shall submit a protocol to DAQ at least 45 days prior to periodic compliance testing and shall submit a notification of periodic compliance testing at least 15 days in advance of the testing.
- iv. The Permittee shall be responsible for ensuring, within practicable limits, that the equipment or processes being tested are operated at or near the maximum normal production rate.
- v. To the extent possible, testing shall be conducted at the maximum normal operating softwood percentage.
- vi. The Permittee shall conduct periodic performance tests when the following conditions are met:
  - (A) The monthly average softwood content exceeds the average softwood percentage documented during prior performance testing by more than 10 percentage points, or
  - (B) The monthly production rate exceeds the average production rate documented during prior performance testing by more than 10 percentage points, or
  - (C) At a minimum testing shall be conducted annually, unless a longer duration is otherwise approved pursuant to Section 2.2.A.1.e.x. Annual performance tests shall be completed no later than 13 months after the previous performance test.
- vii. The Permittee shall notify the DAQ within 15 days when the conditions specified in Section 2.2 A.1.e.vi (A) or (B) are met.
- viii. The Permittee shall conduct the periodic performance test and submit a written report of the test results to the DAQ within 90 days from the date the monthly softwood content or overall production rate increased as described in Section 2.2 A.1.e.vi (A) and (B) above, unless an alternate date is approved in advance by DAQ,
- ix. When periodic performance testing has occurred at 90 percent softwood AND at 90 percent of the maximum permitted throughput, subsequent periodic performance testing shall occur on an annual

- basis and shall be completed no later than 13 months after the previous performance test, unless a longer duration is otherwise approved pursuant to Section 2.2.A.1.e.x.
- x. The Permittee may request that the performance tests be conducted less often for a given pollutant if the performance tests for at least 3 consecutive years show compliance with the emission limit. If the request is granted, the Permittee shall conduct a performance test no more than 36 months after the previous performance test for the given pollutant.
  - xi. If a performance test shows noncompliance with an emission limit for a given pollutant, the Permittee shall return to conducting annual performance tests (no later than 13 months after the previous performance test) for that pollutant.
  - xii. Except as specified in Section 2.2 A.1.e.viii above, the Permittee shall submit a written report of results for any periodic performance test to the DAQ, not later than 30 days after sample collection, in accordance with 15A NCAC 02D .2602(h).
  - xiii. The Permittee may re-establish any parametric operating value during periodic testing. Compliance with previously approved parametric operating values is not required during periodic required testing or other tests undertaken to re-establish parametric operating values by the Permittee. If the new parametric operating values re-established during periodic testing are more stringent, the Permittee shall submit a request to revise the value(s) in the permit at the same time the test report required pursuant to General Condition 17 is submitted. The permit revision will be processed pursuant to 15A NCAC 02Q .0514. If, during performance testing, the new parametric operating values are less stringent, the Permittee may request to revise the value(s) in the permit pursuant to 15A NCAC 02Q .0515.
  - xiv. The Permittee shall comply with applicable emission standards at all times, except as allowed by Section 2.2 A.1.b, including during periods of testing.

**Monitoring/Recordkeeping** [15ANCAC 02Q .0308(a)]

- f. Within six months of issuance of this permit (10386R04), the Permittee shall submit to the DAQ a permit application that includes one of the following:
  - i. A revised BACT analysis for VOC emissions from the dry hammermills (**ID Nos. ES-HM-1 to ES-HM-8**) and the pellet presses and pellet coolers (**ID No. ES-CLR-1 to ES-CLR-6**), OR
  - ii. A request for an avoidance condition for 15A NCAC 02D .0530, Prevention of Significant Deterioration, for VOC emissions.
- g. Regardless of the actual completion date of the SWEP, the Permittee shall complete the rerouting of the exhaust from green wood hammermills (**ID Nos. ES-GHM-1, ES-GHM-2, and ES-GHM-3**) to the wet electrostatic precipitator (**ID No. CD-WESP**) and the regenerative thermal oxidizer (**ID No. CD-RTO**) within twelve (12) months of issuance of this permit (10368R04).
- h. The Permittee shall not increase production beyond 537,625 oven-dried tons (ODT) of pellets per consecutive 12-month period (the permitted maximum production rate in Air Permit No. 10386R03) until exhaust from the green wood hammermills (**ID Nos. ES-GHM-1, ES-GHM-2, and ES-GHM-3**) has been rerouted to the wet electrostatic precipitator (**ID No. CD-WESP**) and the regenerative thermal oxidizer (**ID No. CD-RTO**).
- i. Upon completion of the SWEP, the Permittee shall not process more than 657,000 ODT of pellets per consecutive 12-month period. The process rate shall be recorded monthly in a logbook (written or electronic format) kept on-site and made available to an authorized representative upon request.
- j. Upon completion of the SWEP, the Permittee shall not process more than 558,450 ODT of pellets per consecutive 12-month period (85% of the permitted maximum production rate of 657,000 ODT per consecutive 12-month period) from the eight dry hammermills (**ID Nos. ES-HM-1 through ES-HM-8**). The dry hammermill process rate shall be recorded monthly in a logbook (written or electronic format) kept on-site and made available to an authorized representative upon request.
- k. The furnace bypass (**ID No. ES-FBYPASS**) shall be limited to less than 50 hours per year for startups (for temperature control) and shutdowns. The furnace bypass shall be limited to a cold startup of 15% maximum heat input (or 37.6 million Btu per hour). The cold startup period of time begins when the wood-fired furnace is started up and lasts until the wood-fired furnace's refractory

is heated to a temperature sufficient to sustain combustion operations at a minimal level or 8 hours, whichever is less.

- l. The furnace bypass (**ID No. ES-FBYPASS**) in idle mode, defined as maximum heat input of 5 million Btu per hour, shall be limited to less than 500 hours per year.
- m. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate all emission sources including associated control devices in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
- n. The Permittee shall record the hardwood/softwood mix monthly in a logbook (written or electronic format) kept on-site and made available to an authorized representative upon request.
- o. The Permittee shall calculate the total emissions of NO<sub>x</sub>, filterable PM, CO, and VOC monthly and shall record the emissions monthly in a logbook (written or electronic format) kept on-site and made available to DAQ personnel upon request.
- p. For the wood-fired direct heat drying system (**ID No. ES-DRYER**), GHG (CO<sub>2</sub>e) emissions shall be calculated monthly and compliance demonstrated using the applicable Part 98 emission factors. Compliance shall be documented on a 12-month rolling basis.
- q. To ensure compliance and effective operation of the RTO (**ID No. CD-RTO**), the Permittee shall maintain a 3-hour rolling average firebox temperature for each of the two fireboxes comprising the RTO at or above the minimum average temperatures established during the most recent performance testing. The Permittee shall maintain records of the 3-hour rolling average temperatures for each firebox. The Permittee shall also perform inspections and maintenance on the RTO as specified above in Section 2.1 A.1.h.
- r. To ensure compliance and effective operation of the wet electrostatic precipitator (**ID No. CD-WESP**), the Permittee shall perform inspections and maintenance as specified above in Section 2.1 A.1.h. The Permittee shall also maintain the minimum secondary voltage and minimum current of the wet electrostatic precipitator as specified above in Section 2.1 A.1.g.
- s. To ensure compliance and effective operation of the baghouses and cyclones, the Permittee shall perform inspections and maintenance as specified above in Section 2.1 A.1.e.
- t. Monitoring and recordkeeping are not required for the following emission sources:
  - i. Paved roads;
  - ii. VOC emissions from storage tanks; and
  - iii. Emission sources with no BACT emission limits or work practice standards.

**Reporting** [15A NCAC 02Q .0308(a), 15A NCAC 02D .0605(b)(3)]

- u. The Permittee shall submit the results of any maintenance performed on the wet electrostatic precipitator, regenerative thermal oxidizer, cyclones, and/or baghouses within 30 days of a written request by the DAQ.
- v. The Permittee shall submit a summary report of the monitoring and recordkeeping activities given in Sections 2.2 A.1.f through u above postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**2. 15A NCAC 02D .0535 EXCESS EMISSIONS REPORTING AND MALFUNCTION**

As required by 15A NCAC 2D .0535, the Permittee of a source of excess emissions that last for more than four hours and that results from a malfunction, a breakdown of process or control equipment or any other abnormal conditions, shall:

- a. Notify the Director or his designee of any such occurrence by 9:00 a.m. Eastern time of the Division's next business day of becoming aware of the occurrence and describe:
  - i. the name and location of the facility,
  - ii. the nature and cause of the malfunction or breakdown,
  - iii. the time when the malfunction or breakdown is first observed,
  - iv. the expected duration, and
  - v. an estimated rate of emissions.
- b. Notify the Director or his designee immediately when the corrective measures have been accomplished.

This reporting requirement does not allow the operation of the facility in excess of Environmental Management Commission Regulations.

### **3. 15A NCAC 02D .0540: PARTICULATES FROM FUGITIVE DUST EMISSION SOURCES**

As required by 15A NCAC 02D .0540 "Particulates from Fugitive Dust Emission Sources," the Permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary. If substantive complaints or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR, Appendix A), the owner or operator may be required to submit a fugitive dust plan as described in 02D .0540(e) and (f).

"Fugitive dust emissions" means particulate matter from process operations that does not pass through a process stack or vent and that is generated within plant property boundaries from activities such as: unloading and loading areas, process areas stockpiles, stock pile working, plant parking lots, and plant roads (including access roads and haul roads).

#### **State-enforceable only**

### **4. 15A NCAC 02D .1806: CONTROL AND PROHIBITION OF ODOROUS EMISSIONS**

The Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary.

### **5. 15A NCAC 02Q .0207: ANNUAL EMISSIONS REPORTING**

The Permittee shall report by **June 30** of each year the actual emissions of each air pollutant listed in 15A NCAC 02Q .0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form as may be established by the Director. The accuracy of the report shall be certified by the responsible official of the facility.

### **6. 15A NCAC 02Q. 0304: APPLICATIONS**

The Permittee, at least 90 days prior to the expiration date of this permit, shall request permit renewal by letter in accordance with 15A NCAC 02Q .0304(d) and (f). Pursuant to 15A NCAC 02Q .0203(i), no permit application fee is required for renewal of an existing air permit. The renewal request should be submitted to the Regional Supervisor, DAQ.



**7. 15A NCAC 02Q .0504: OPTION FOR OBTAINING CONSTRUCTION AND OPERATION PERMIT**

- a. The Permittee shall file a Title V Air Quality Permit Application pursuant to 15A NCAC 02Q .0504 to amend the existing Title V first time application (8200152.17B) on or before 12 months after commencing operation of any of the new sources or control devices listed in this permit.

**Reporting [15A NCAC 02Q .0504]**

- b. The Permittee shall notify the Regional Office in writing of the date of beginning operation of any of the new sources or control devices listed in this permit, postmarked no later than 30 days after

## SECTION 3 - GENERAL CONDITIONS

1. In accordance with G.S. 143-215.108(c)(1), TWO COPIES OF ALL DOCUMENTS, REPORTS, TEST DATA, MONITORING DATA, NOTIFICATIONS, REQUESTS FOR RENEWAL, AND ANY OTHER INFORMATION REQUIRED BY THIS PERMIT shall be submitted to:

Heather Carter  
Regional Air Quality Supervisor  
North Carolina Division of Air Quality  
Fayetteville Regional Office  
Systel Building, 225 Green Street, Suite 714  
Fayetteville, NC 28301  
(910) 433-3300

For identification purposes, each submittal should include the facility name as listed on the permit, the facility identification number, and the permit number.

2. RECORDS RETENTION REQUIREMENT - In accordance with 15A NCAC 02D .0605, any records required by the conditions of this permit shall be kept on site and made available to DAQ personnel for inspection upon request. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. These records must be kept on site for a minimum of 2 years, unless another time period is otherwise specified.
3. ANNUAL FEE PAYMENT - Pursuant to 15A NCAC 02Q .0203(a), the Permittee shall pay the annual permit fee within 30 days of being billed by the DAQ. Failure to pay the fee in a timely manner will cause the DAQ to initiate action to revoke the permit.
4. EQUIPMENT RELOCATION - In accordance with 15A NCAC 02Q .0301, a new air permit shall be obtained by the Permittee prior to establishing, building, erecting, using, or operating the emission sources or air cleaning equipment at a site or location not specified in this permit.
5. REPORTING REQUIREMENT - In accordance with 15A NCAC 02Q .0309, any of the following that would result in previously unpermitted, new, or increased emissions must be reported to the Regional Supervisor, DAQ:
  - a. changes in the information submitted in the application regarding facility emissions;
  - b. changes that modify equipment or processes of existing permitted facilities; or
  - c. changes in the quantity or quality of materials processed.

If appropriate, modifications to the permit may then be made by the DAQ to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.

6. In accordance with 15A NCAC 02Q .0309, this permit is subject to revocation or modification by the DAQ upon a determination that information contained in the application or presented in the support thereof is incorrect, conditions under which this permit was granted have changed, or violations of conditions contained in this permit have occurred. In accordance with G.S. 143-215.108(c)(1), the facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air cleaning device(s) and appurtenances.
7. In accordance with G.S. 143-215.108(c)(1), this permit is nontransferable by the Permittee. Future owners and operators must obtain a new air permit from the DAQ.

8. In accordance with G.S. 143-215.108(c)(1), this issuance of this permit in no way absolves the Permittee of liability for any potential civil penalties which may be assessed for violations of State law which have occurred prior to the effective date of this permit.
9. In accordance with G.S. 143-215.108(c)(1), this permit does not relieve the Permittee of the responsibility of complying with all applicable requirements of any Federal, State, or Local water quality or land quality control authority.
10. In accordance with 15A NCAC 02D .0605, reports on the operation and maintenance of the facility shall be submitted by the Permittee to the Regional Supervisor, DAQ at such intervals and in such form and detail as may be required by the DAQ. Information required in such reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and preventive maintenance schedules.
11. A violation of any term or condition of this permit shall subject the Permittee to enforcement pursuant to G.S. 143-215.114A, 143-215.114B, and 143-215.114C, including assessment of civil and/or criminal penalties.
12. Pursuant to North Carolina General Statute 143-215.3(a)(2), no person shall refuse entry or access to any authorized representative of the DAQ who requests entry or access for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.
13. In accordance with G.S. 143-215.108(c)(1), this permit does not relieve the Permittee of the responsibility of complying with any applicable Federal, State, or Local requirements governing the handling, disposal, or incineration of hazardous, solid, or medical wastes, including the Resource Conservation and Recovery Act (RCRA) administered by the Division of Waste Management.
14. PERMIT RETENTION REQUIREMENT - In accordance with 15A NCAC 02Q .0110, the Permittee shall retain a current copy of the air permit at the site. The Permittee must make available to personnel of the DAQ, upon request, the current copy of the air permit for the site.
15. CLEAN AIR ACT SECTION 112(r) REQUIREMENTS - Pursuant to 15A NCAC 02D .2100 "Risk Management Program," if the Permittee is required to develop and register a risk management plan pursuant to Section 112(r) of the Federal Clean Air Act, then the Permittee is required to register this plan with the USEPA in accordance with 40 CFR Part 68.
16. PREVENTION OF ACCIDENTAL RELEASES - GENERAL DUTY - Pursuant to Title I Part A Section 112(r)(1) of the Clean Air Act "Hazardous Air Pollutants - Prevention of Accidental Releases - Purpose and General Duty," although a risk management plan may not be required, if the Permittee produces, processes, handles, or stores any amount of a listed hazardous substance, the Permittee has a general duty to take such steps as are necessary to prevent the accidental release of such substance and to minimize the consequences of any release. **This condition is federally-enforceable only.**
17. GENERAL EMISSIONS TESTING AND REPORTING REQUIREMENTS - If emissions testing is required by this permit, or the DAQ, or if the Permittee submits emissions testing to the DAQ in support of a permit application or to demonstrate compliance, the Permittee shall perform such testing in accordance with 15A NCAC 02D .2600 and follow all DAQ procedures including protocol approval, regional notification, report submittal, and test results approval.

Permit issued this the 2<sup>nd</sup> day of October, 2019.

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION

*for* 

William D. Willets, P.E., Chief, Permitting Section  
Division of Air Quality, NCDEQ  
By Authority of the Environmental Management Commission

Air Permit No. 10386R04



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

June 4, 2007

Ms. E.A. Veronica Barringer  
Bureau of Air Quality  
South Carolina Department of Health  
and Environmental Services  
2600 Bull Street  
Columbia, South Carolina 29201

Dear Ms. Barringer:

By letter dated June 14, 2005, the Region 4 office of the U.S. Environmental Protection Agency (EPA) sent an opinion to the South Carolina Department of Health and Environmental Control (SCDHEC) on whether operations at two South Carolina emissions sources should be considered "fuel conversion plants" for prevention of significant deterioration (PSD) applicability purposes. The operations in question were wood waste (biomass) gasification operations at the Norbord South Carolina, Inc. (Norbord) oriented strandboard manufacturing facility and at the University of South Carolina (USC) campus in Columbia. In our letter we expressed the opinion that both biomass gasification operations should be considered fuel conversion plants. We also stated that our opinion did not mean the entire Norbord and USC facilities should be considered fuel conversion plants. Rather, our opinion was that just the operations (and emissions units) associated directly with biomass gasification constitute a fuel conversion plant for these facilities.

After our opinion letter was submitted, Norbord provided additional information to SCDHEC and asked for further review. SCDHEC in turn requested reconsideration by EPA. Upon further review of the statutory and regulatory history of the PSD rules and of past EPA statements on the activities constituting a fuel conversion plant, we now are of the opinion that the biomass gasification operation at the Norbord facility should not be considered a fuel conversion plant for PSD applicability purposes. The rationale for our revised opinion is provided below.

As stated in our original opinion letter, we are responding to SCDHEC's request based on how we believe such a request would be resolved under the federal PSD rules in Title 40 Code of Federal Regulations and under EPA policies. Our response does not represent final agency action. Instead, this letter provides guidance for SCDHEC to consider in its role as the PSD reviewing authority.

## Background

The PSD rules applicable to Norbord are South Carolina's rules in Regulation 61-62.5, Standard No. 7. SCDHEC's PSD rules, just like federal PSD rules in 40 CFR 52.21, contain a list of source categories for which the major source emissions threshold is 100 tons per year (tpy) of any individual regulated new source review (NSR) pollutant. One of these source categories is "fuel conversion plants." Sources not listed have a major source emissions threshold of 250 tpy.

Norbord operates three rotary gasifier/burner oxidizer systems at its oriented strandboard facility. Each system includes a rotary kiln gasifier generating a synthetic gas from gasification of wood waste. The synthetic gas is burned in a secondary combustion chamber producing hot exhaust gases used to produce steam and (in one system) hot oil for manufacturing process needs. A feature essential to the opinion expressed below is that the gasification process at Norbord does not involve fossil fuels. All of the material feeding the gasification process is a biomass, non-fossil material.

## Review of History on the Fuel Conversion Plant Source Category

As part of our reconsideration, we have reviewed the history of the PSD program as related to the establishment of the list of specific source categories now embodied in the definition of "major source." A summary of our review is as follows, starting with a summary of the statutory and regulatory history.

- Congress established the basic framework for a national air quality control program in the Clean Air Act as amended in 1970. These amendments, however, did not contain any explicit requirements on preventing significant deterioration of air quality.
- Responding to a lawsuit, the U.S. District Court for the District of Columbia issued an opinion (*Sierra Club v. Ruckelshaus*) on May 30, 1972, directing EPA to establish rules for preventing significant deterioration of air quality. On November 1, 1972, the U.S. Court of Appeals for the District of Columbia affirmed the opinion of the District Court. The District Court opinion was then stayed by the U.S. Supreme Court until June 11, 1973, when the Supreme Court (in an equally divided opinion) affirmed the judgment of the Court of Appeals, thereby upholding the District Court opinion.
- EPA proposed PSD rules on July 16, 1973 (38 FR 18986) and listed 16 source categories covered by the rules. This list did not include fuel conversion plants. Also, as of that time EPA had not introduced the 100 tpy/250 tpy two-tier approach to defining major sources.
- On August 27, 1974 (39 FR 31000), EPA re-proposed the PSD rules and included this statement in the preamble: "The list of sources subject to review has been expanded to include three additional source types - fuel conversion plants (such as coal gasification and oil shale plants) ...." The re-proposed rule itself did not contain a definition of the

term fuel conversion plants. In addition, the two-tier approach was still not part of PSD regulations.

- On December 5, 1974 (39 FR 42510), EPA promulgated the first set of PSD rules. These rules contained “fuel conversion plants” as a listed source category but without a definition of the term. The two-tier approach was still absent.
- In August 1977, Congress adopted the Clean Air Act Amendments of 1977 with a statutory PSD section. The 1977 amendments included the PSD 100 tpy/250 tpy two-tier concept along with a list of the source categories having a 100-tpy PSD major source threshold. The listed categories included fuel conversion plants, but without any definition of the term.
- Pursuant to the Clean Air Act Amendments of 1977, EPA issued implementing PSD regulations in June 1978 and revised them in August 1980 in response to the holdings in *Alabama Power Company v. Costle*. The 1980 PSD rules contained the 100-tpy source category list with fuel conversion plants as one of the categories but again without definition. This list (still without definitions) remains in current federal PSD rules and in current SCDHEC PSD rules.

We next proceed to a summary of EPA statements on the meaning of the term fuel conversion as expressed in various documents.

- PSD source clarification memo; January 20, 1976 - This memo was from EPA headquarters in response to an EPA Region 4 request for clarification on sources subject to PSD review. The memo contains this statement: “Fuel conversion plants are defined for purposes of PSD as those plants which accomplish a change in state for a given fossil fuel. The large majority of these plants are likely to accomplish these changes through coal gasification, coal liquefaction, or oil shale processing.”
- Cleveland Electric memo; May 26, 1992 - At the plant in question, Cleveland Electric proposed to produce fuel gas by means of gasifying municipal waste. EPA concluded that this process qualified as a fuel conversion plant and made the following statement: “Fuel conversion plants obviously include those plants which accomplish a change in state (e.g., solid to liquid to gas) for a fuel. This definition includes conversion of the following fuels: fossil (e.g., coal or oil shale); biomass (e.g., wood or peat); and anthropogenic (e.g., municipal waste derived fuel and inorganic fuel). The majority of such sources are likely to accomplish these changes through either gasification, liquefaction, or solidification. ... Generally, however, applicability for this source category is determined by whether a facility changes state (e.g., solid to gas) or form (e.g., process sawdust into a pellet) of a fuel.”
- Pencor-Masada Oxynol order; May 2, 2001 - In this order (referred to as the Masada I order) issued by the EPA Administrator in response to a title V operating permit petition, the Administrator covered various topics related to a refuse recycling and ethanol production facility. One of these topics was whether a gasifier associated with refuse

processing was a fuel conversion process. EPA's conclusion reads in part as follows: "Based on our review, EPA policy has historically defined this category [fuel conversion plants] as 'plants which accomplish a change in state for a given fossil fuel. The large majority of these plants are likely to accomplish these changes through coal gasification, coal liquefaction or oil shale processing.' In this case, where fossil fuels are not involved and where the processing involves hydrolysis, a chemical process, it is EPA's judgment that the Masada facility is not a fuel conversion plant." [The embedded quote is from the January 20, 1976 memo listed above.]

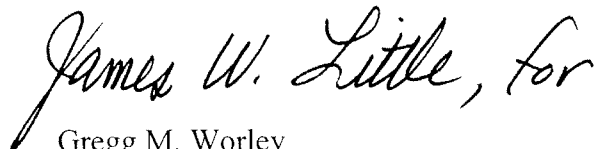
The 1976 memo and the 2001 order support the idea that the term fuel conversion plants is limited to facilities engaged in the processing of fossil fuels, whereas the 1992 memo does not.

### **Revised Opinion**

By this letter we now revise our opinion for the Norbord gasifier operation based on the likely meaning of the term fuel conversion projects at the time it was first introduced (as indicated by the preamble statement in the August 1974 re-proposal of PSD rules and in the January 1976 memo), recognizing that there have been no statutory or regulatory changes since that time necessitating a different view of the term. Our revised opinion is that the Norbord gasifier operation is not a fuel conversion plant because it does not involve a fossil fuel. This opinion is consistent with the Masada I order issued by the EPA Administrator in May 2001. Concurrence with this opinion has been obtained from EPA's Office of Air and Radiation (including the Office of Air Quality Planning and Standards) and Office of General Counsel.

If you have any questions concerning the opinion expressed in this letter, please call Jim Little at 404-562-9118.

Sincerely,

A handwritten signature in cursive script that reads "James W. Little, for".

Gregg M. Worley  
Chief  
Air Permits Section



ROY COOPER  
Governor

MICHAEL S. REGAN  
Secretary

MICHAEL ABRACZINSKAS  
Director



NORTH CAROLINA  
Environmental Quality

October 30, 2019

Mr. Mark Jordan  
Plant Manager  
Enviva Pellets Northampton, LLC  
7200 Wisconsin Avenue  
Bethesda, Maryland 20814

Dear Mr. Jordan:

SUBJECT: Air Quality Permit No. 10203R06  
Facility ID: 6600167  
Enviva Pellets Northampton, LLC  
Garysburg, North Carolina  
Northampton County  
Fee Class: Title V

In accordance with your Air Permit Applications received on October 1, 2018 and amended version received on April 1, 2019, we are forwarding herewith Air Quality Permit No. 10203R06 to Enviva Pellets Northampton, LLC, 309 Enviva Boulevard, Garysburg, North Carolina, authorizing the construction and operation, of the emission source(s) and associated air pollution control device(s) specified herein. Additionally, any emissions activities determined from your Air Quality Permit Application as being insignificant per 15A North Carolina Administrative Code 02Q .0102 have been listed for informational purposes as an "ATTACHMENT." Please note the requirements for the annual compliance certification are contained in General Condition P in Section 3. The current owner is responsible for submitting a compliance certification for the entire year regardless of who owned the facility during the year.

As the designated responsible official it is your responsibility to review, understand, and abide by all of the terms and conditions of the attached permit. It is also your responsibility to ensure that any person who operates any emission source and associated air pollution control device subject to any term or condition of the attached permit reviews, understands, and abides by the condition(s) of the attached permit that are applicable to that particular emission source.

If any parts, requirements, or limitations contained in this Air Quality Permit are unacceptable to you, you have the right to request a formal adjudicatory hearing within 30 days following receipt of this permit, identifying the specific issues to be contested. This hearing request must be in the form of a written petition, conforming to NCGS (North Carolina General Statutes) 150B-23, and filed with both the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, North Carolina 27699-6714 and the Division of Air Quality, Permitting Section, 1641 Mail Service Center, Raleigh, North Carolina 27699-1641. The form for requesting a formal adjudicatory hearing may be obtained upon request from the Office of Administrative Hearings. Please note that this permit will be stayed in its entirety upon receipt of the request for a hearing. Unless a request for a hearing is made pursuant to NCGS 150B-23, this Air Quality Permit shall be final and binding 30 days after issuance.



North Carolina Department of Environmental Quality | Division of Air Quality  
217 West Jones Street | 1641 Mail Service Center | Raleigh, North Carolina 27699-1641  
919.707.8400

You may request modification of your Air Quality Permit through informal means pursuant to NCGS 150B-22. This request must be submitted in writing to the Director and must identify the specific provisions or issues for which the modification is sought. Please note that this Air Quality Permit will become final and binding regardless of a request for informal modification unless a request for a hearing is also made under NCGS 150B-23.

The construction of new air pollution emission source(s) and associated air pollution control device(s), or modifications to the emission source(s) and air pollution control device(s) described in this permit must be covered under an Air Quality Permit issued by the Division of Air Quality prior to construction unless the Permittee has fulfilled the requirements of NCGS 143-215.108A(b) and received written approval from the Director of the Division of Air Quality to commence construction. Failure to receive an Air Quality Permit or written approval prior to commencing construction is a violation of NCGS 143-215.108A and may subject the Permittee to civil or criminal penalties as described in NCGS 143-215.114A and 143-215.114B.

Northampton County has triggered increment tracking under PSD for NO<sub>x</sub>, SO<sub>2</sub>, PM-10, and PM-2.5. This modification will result in an increase of 26.4 pounds per hour of NO<sub>x</sub>, an increase of 4.6 pounds per hour of SO<sub>2</sub>, a decrease of 0.7 pounds per hour of PM-10, and a decrease of 2.3 pounds per hour of PM-2.5.

This Air Quality Permit shall be effective from October 30, 2019 until February 28, 2025, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein. Should you have any questions concerning this matter, please contact Richard Simpson at (919) 707-8476 or richard.simpson@ncdenr.gov.

Sincerely yours,



for William D. Willets, P.E., Chief, Permitting Section  
Division of Air Quality, NCDEQ

c: EPA Region 4  
Ray Stewart, Supervisor, Raleigh Regional Office  
Central Files  
Connie Horne (Cover letter only)

## ATTACHMENT

### Insignificant Activities per 15A NCAC 02Q .0102

| Emission Source ID No.                  | Emission Source Description                                                                              |
|-----------------------------------------|----------------------------------------------------------------------------------------------------------|
| IES-Debark                              | Debarker                                                                                                 |
| IES-Bark                                | Bark Hog                                                                                                 |
| IES-DDB-1 through IES-DDB-4             | Four natural gas/propane-fired low NOx double duct burners (each rated at 1 MMBtu/hour)                  |
| IES DLH                                 | Dry line hopper                                                                                          |
| IES-EPWC                                | Electric powered green wood chipper                                                                      |
| IES-GWFB                                | Green wood fuel storage bin                                                                              |
| IES-DRYSHAVE                            | Dry shaving handling and storage systems                                                                 |
| IES-DRYSHAVE-1                          | Dry shaving handling and storage systems with one bagfilter CD-DSR-BF (2,577 square feet of filter area) |
| IES-PVAP                                | Propane vaporizer                                                                                        |
| IES-ADD                                 | Additive handling and storage with one bagfilter CD-ADD-BF (TBDXXX square feet of filter area)           |
| IES-GN-1<br><b>NSPS IIII, GACT ZZZZ</b> | One emergency use generator (350 brake horsepower)                                                       |
| IES-GN-2<br><b>NSPS IIII, GACT ZZZZ</b> | One emergency use generator (671 brake horsepower)                                                       |
| IES-FWP<br><b>NSPS IIII, GACT ZZZZ</b>  | One fire water pump (300 brake horsepower)                                                               |
| IES-TK1 and IES-TK2                     | Two diesel storage tanks (2,500 gallon and 600 gallon capacity)                                          |
| IES-TK3                                 | Mobile diesel storage tank (5,000 gallon)                                                                |
| IES-TK4                                 | Diesel storage tank (1,000 gallon)                                                                       |

1. Because an activity is insignificant does not mean that the activity is exempted from an applicable requirement or that the Permittee is exempted from demonstrating compliance with any applicable requirement.
2. When applicable, emissions from stationary source activities identified above shall be included in determining compliance with the permit requirements for toxic air pollutants under 15A NCAC 02D .1100 "Control of Toxic Air Pollutants" or 02Q .0711 "Emission Rates Requiring a Permit."
3. For additional information regarding the applicability of MACT or GACT see the DAQ page titled "Specific Permit Conditions Regulatory Guide." The link to this site is as follows: <http://deq.nc.gov/about/divisions/air-quality/air-quality-permits/specific-permit-conditions-regulatory-guide>.

## Summary of Changes to Permit

The following changes were made to Enviva Pellets Northampton, LLC, Garysburg, NC., Air Permit No. 10203R05 (*Table of Changes as sent to public notice July 19, 2019*).

| Page No.     | Section                      | Description of Changes                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|--------------|------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Cover Letter | N/A                          | Updated cover letter with application number, permit numbers, dates, fee class, and Director name.                                                                                                                                                                                                                                                                                                                                                                                          |
| NA           | Insignificant Activities     | Added new sources debarker IES-Debark, bark hog IES-Bark, four natural gas/propane double duct burners IES-DDB-1 through IES-DDB-4, dry shaving handling and storage systems IES-DRYSHAVE, dry shaving handling and storage systems IES-DRYSHAVE-1 with one bagfilter CD-DSR-BF, propane vaporizer IES-PVAP, additive handling and storage IES-ADD with one bagfilter CD-ADD-BF, one emergency use generator IES-GN-2, mobile diesel storage tank IES-TK3, and diesel storage tank IES-TK4. |
| NA           | Insignificant Activities     | Reclassified dry line hopper to an insignificant source and changed ID No. to IES-DLH.                                                                                                                                                                                                                                                                                                                                                                                                      |
| NA           | Insignificant Activities     | Reclassified dry wood handling IES-DWH and green wood handling and storage IES-GWHS as significant sources and changed ID Nos. to ES-DWH-1 and ES-GWHS.                                                                                                                                                                                                                                                                                                                                     |
| NA           | Insignificant Activities     | Pellet press system IES-PP was deleted since it is incorporated with the pellet coolers.                                                                                                                                                                                                                                                                                                                                                                                                    |
| NA           | Insignificant Activities     | Finished product handling IES-FPH was deleted since it is incorporated with handling ES-FPH.                                                                                                                                                                                                                                                                                                                                                                                                |
| NA           | Insignificant Activities     | Log chipper IES-CHIP-1 was deleted since it is incorporated with chipper IES-EPWC.                                                                                                                                                                                                                                                                                                                                                                                                          |
| NA           | Insignificant Activities     | Two electric powered wood re-chippers, IES-RCHP-1 and IES-RCHP-2, were deleted since they are being replaced by five new green hammermills (ES-GHM-1 through ES-GHM-5).                                                                                                                                                                                                                                                                                                                     |
| NA           | Insignificant Activities     | Generator ID No. was changed from IES-GN to IES-GN-1. Diesel storage tanks ID Nos. were changed from IS-TK1 and IS-TK2 to IES-TK1 and IES-TK2. IES-TK2 capacity was updated from 500 gallons to 600 gallons.                                                                                                                                                                                                                                                                                |
| 3, 6         | Section 1 and Section 2.1 A. | Add five (5) new closed-loop green hammermills (ES-GHM-1 through ES-GHM-5) and route the exhaust to the existing wet electrostatic precipitator (CD-WESP-1) and the new regenerative thermal oxidizer (CD-RTO-1). The Green hammermills exhaust will also have the ability to be routed and controlled by new CD-WESP-2 and new CD-RTO-2 when the CD-WESP-1 and CD-RTO-1 are shut down. Simple cyclone CD-DC is for product handling and deleted from the permit as a control device.       |
| 3, 6         | Section 1 and Section 2.1 A. | Updated wood dryer ID No. from (ES-DRYER) to (ES-DRYER-1). The exhaust will route to existing wet electrostatic precipitator (CD-WESP-1) and the new regenerative thermal oxidizer (CD-RTO-1).                                                                                                                                                                                                                                                                                              |
| 3, 6         | Section 1 and Section 2.1 A. | Added dryer 1 bypass ES-DRYERBYP-1 and furnace 1 bypass (ES-FURNACEBYP-1).                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 3, 6         | Section 1 and Section 2.1 A. | Added a new direct heat wood fired dryer (ES-DRYER-2) controlled by new wet electrostatic precipitator CD-WESP-2 in series with a new regenerative thermal oxidizer (CD-RTO-2).                                                                                                                                                                                                                                                                                                             |
| 3, 6         | Section 1 and Section 2.1 A. | Added dryer 2 bypass (ES-DRYERBYP-2) and furnace 2 bypass (ES-FURNACEBYP-2).                                                                                                                                                                                                                                                                                                                                                                                                                |

| Page No. | Section                           | Description of Changes                                                                                                                                                                                                                                                                                        |
|----------|-----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3, 6     | Section 1 and Section 2.1 A.      | Added a new dry wood handling (ES-DWH-2) controlled by a new bagfilter (CD-DWH-BF-2).                                                                                                                                                                                                                         |
| 3, 6     | Section 1 and Section 2.1 A.      | Assigned source ID Nos. (ES-PS-1) and (ES-PS-2) to existing dry hammermill pre-screensers.                                                                                                                                                                                                                    |
| 4, 6     | Section 1 and Section 2.1 A.      | The eight existing dry hammermills exhaust will also route through new wet scrubber (CD-WS-1) and regenerative catalytic oxidizer (CD-RCO-1) that can also operate as an RTO.                                                                                                                                 |
| 4, 6     | Section 1 and Section 2.1 A.      | Renamed existing nuisance system to dust control system (ES-DCS) and update the permit to reflect that the exhaust will route through new wet scrubber (CD-WS-1) and regenerative catalytic oxidizer (CD-RCO-1) that can operate as an RTO.                                                                   |
| 4, 6     | Section 1 and Section 2.1 A.      | Added a new dry shavings reception (ES-DSR) controlled by a new bagfilter (CD-DSR-BF).                                                                                                                                                                                                                        |
| 4, 6     | Section 1 and Section 2.1 A.      | Added a new dry shavings silo (ES-DSS) controlled by a new bagfilter (CD-DSS-BF).                                                                                                                                                                                                                             |
| 4, 6     | Section 1 and Section 2.1 A.      | Added two new dry shavings hammermills (ES-DSHM-1 and ES-DSHM-2) controlled by new wet scrubber (CD-WS-1) and regenerative catalytic oxidizer (CD-RCO-1) that can operate as an RTO.                                                                                                                          |
| 5, 6     | Section 1 and Section 2.1 A.      | The six existing pellet coolers exhaust will also route through new wet scrubber (CD-WS-2) and regenerative catalytic oxidizer (CD-RCO-2) that can operate as an RTO.                                                                                                                                         |
| 5, 6     | Section 1 and Section 2.1 A.      | Rename the currently permitted Pellet Fines Bin (ES-PFB-1) and associated bin vent filter (CD-PFB-BV) to Pellet Cooler Fines Relay System (ES-PCHP) and baghouse (CD-PCHP-BV.)                                                                                                                                |
| NA       | Section 1 and Section 2.1 A.      | Since the sources will not be utilized, deleted bagging system conveyor and screens (ES-BSC-1, ES-BSS-1, and ES-BSS-2) and associated filters (CD-BS-BF-1 and CD-BS-BF-2).                                                                                                                                    |
| NA       | Section 1 and Section 2.1 A.      | Since the sources will not be utilized, deleted bagging systems (ES-BSC-2, ES-BSC-3, ES-BSB-1, and ES-BSB-2).                                                                                                                                                                                                 |
| 6, 11    | Section 2.1 A. and Section 2.1 4. | Added 15A NCAC 02D .0535 Excess emissions reporting and malfunctions rule to the table and section.                                                                                                                                                                                                           |
| 6        | Section 2.1 A.                    | Added PM, NO <sub>x</sub> , and CO to the table for PSD avoidance.                                                                                                                                                                                                                                            |
| 8        | Section 2.1 A.1.c.                | To demonstrate compliance with 15A NCAC 02D .0515, added particulate testing.                                                                                                                                                                                                                                 |
| 8, 9     | Section 2.1 A.1.d through i.      | Added the new control devices for monitoring requirements.                                                                                                                                                                                                                                                    |
| 9        | Section 2.1 A.1.j.                | Added the recordkeeping requirements.                                                                                                                                                                                                                                                                         |
| 10       | Section 2.1 A.2.                  | Added the new wood dryer to the 15A NCAC 02D .0516 requirements.                                                                                                                                                                                                                                              |
| 11       | Section 2.2 A.                    | Added the table for the regulated pollutants and applicable standards.                                                                                                                                                                                                                                        |
| 12       | Section 2.2 A.1.                  | Added regulation 15A NCAC 02D .0540 Particulates from Fugitive Dust Emissions.                                                                                                                                                                                                                                |
| 12       | Section 2.2 A.2.                  | Included existing PSD avoidance conditions until the facility meets Construction Schedule per Section 2.3. Also updated conditions to include dryer, dry hammermill, and pellet cooler systems throughput limitations along with associated percent softwood limitations on a rolling 12-month average basis. |

| Page No. | Section           | Description of Changes                                                                                                                                                                                                                                                                                                          |
|----------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 13       | Section 2.2 A.3.  | Added regulation 15A NCAC 02Q .0317 Avoidance Condition for 15A NCAC 02D .0530: Prevention of Significant Deterioration facility-wide for PM, VOCs, and NOx. Conditions include throughput and softwood limits along with initial and periodic testing, monitoring, recordkeeping, and reporting for the proposed modification. |
| 18       | Section 2.2 A.4.  | Added regulation 15A NCAC 02Q .0317 Avoidance Condition for 15A NCAC 02D .1111: Maximum Available Control Technology (MACT) Standards facility-wide for HAPs. Conditions include initial and periodic testing, monitoring, recordkeeping, and reporting.                                                                        |
| 18       | Section 2.2 A.5.  | Included existing 15A NCAC 02D .1100 Toxics Air Pollutant Emissions Limitation and Requirement until the facility meets Construction Schedule per Section 2.3.                                                                                                                                                                  |
| 19       | Section 2.2 A.6.  | Added eleven toxics pollutants and new associated equipment to 15A NCAC 02D .1100 Toxics Air Pollutant Emissions Limitation and Requirement.                                                                                                                                                                                    |
| 20       | Section 2.2 A.7.  | Deleted the eleven toxics pollutants that were moved to Section 2.2 A.4.                                                                                                                                                                                                                                                        |
| 22       | Section 2.2 A.8.  | Added regulation 15A NCAC 02Q .1806 Control and Prohibition of Odorous Emissions.                                                                                                                                                                                                                                               |
| 23       | Section 2.2 A.9.  | Added regulation 15A NCAC 02Q .0207 Annual Emissions Reporting.                                                                                                                                                                                                                                                                 |
| 23       | Section 2.2 A.10. | Added regulation 15A NCAC 02Q .0304 Applications Annual Emissions Reporting.                                                                                                                                                                                                                                                    |
| 23       | Section 2.2 A.11. | Added regulation 15A NCAC 02Q .0504 Option for Obtaining Construction and Operation Permit.                                                                                                                                                                                                                                     |
| 23       | Section 2.3.      | Added Section 2.3 for a Construction Schedule.                                                                                                                                                                                                                                                                                  |
| 25-27    | Section 3         | The General Conditions were updated to the latest version of DAQ shell.                                                                                                                                                                                                                                                         |

### Summary of Changes to Permit

The following changes were made to Enviva Pellets Northampton, LLC, Garysburg, NC., Air Permit No. 10203R05 (*Table of Changes in response to Hearing Officer's recommendations*).

| Page No. | Section                                | Description of Changes                                                                                                                                                                                                                                                                                                                                                           |
|----------|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10       | Section 2.1 A.1.l.                     | Added semiannual reporting requirements.                                                                                                                                                                                                                                                                                                                                         |
| 11       | Section 2.1 A.3.e.                     | Added semiannual reporting requirements.                                                                                                                                                                                                                                                                                                                                         |
| 12       | Section 2.2 A.2.b.i. and 2.2 A.2.b.ii. | Changed the word pellets to wood.                                                                                                                                                                                                                                                                                                                                                |
| 14       | Section 2.2 A.3.c.vii.                 | Deleted dryer bypass malfunction hours and reserved the section                                                                                                                                                                                                                                                                                                                  |
| 14       | Section 2.2 A.3.c.viii.                | Deleted furnace bypass malfunction hours. Added maximum heat input percentage for cold startup. Added description: "The cold startup period of time begins when a wood-fired furnace is started up and lasts until the wood-fired furnace's refractory is heated to a temperature sufficient to sustain combustion operations at a minimal level or 8 hours, whichever is less;" |

| Page No. | Section             | Description of Changes                                                                                                                                                                                                              |
|----------|---------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 17       | Section 2.2 A.3.o.  | Deleted “for malfunctions”.                                                                                                                                                                                                         |
| 17       | Section 2.2 A.3.q.  | Added an equation to calculate monthly NOx emissions.                                                                                                                                                                               |
| 18       | Section 2.2 A.3.t.  | Added reporting requirements: “The monthly ODT of pellets per year for the previous 17 months.” and “The monthly hardwood/softwood mix for the previous 17 months.”                                                                 |
| 22       | Section 2.2 A.6.b.  | Added current shell language for 15A NCAC 02D .1100 regulations including the date the facility submitted the modeling analysis and the date the modeling analysis was reviewed and approved by the AQAB.                           |
| 23       | Section 2.2 A.11.a. | Changed 15A NCAC 02Q .0504 condition to: “Pursuant to 15A NCAC 02Q .0504, the Permittee filed its first time Title V Air Quality Permit Application (6600167.14B) on April 22, 2014.”                                               |
| 23       | Section 2.2 A.11.b. | Changed 15A NCAC 02Q .0504 condition to: “The Permittee shall amend the first time Title V Air Quality Permit Application (6600167.14B) within 90 days of the issuance of Permit No. 10203R06.” Deleted the reporting requirements. |



State of North Carolina  
Department of Environmental Quality  
Division of Air Quality

## AIR QUALITY PERMIT

| Permit No. | Replaces Permit No.(s) | Effective Date   | Expiration Date   |
|------------|------------------------|------------------|-------------------|
| 10203R06   | 10203R05               | October 30, 2019 | February 28, 2025 |

Until such time as this permit expires or is modified or revoked, the below named Permittee is permitted to construct and operate the emission source(s) and associated air pollution control device(s) specified herein, in accordance with the terms, conditions, and limitations within this permit. This permit is issued under the provisions of Article 21B of Chapter 143, General Statutes of North Carolina as amended, and Title 15A North Carolina Administrative Codes (15A NCAC), Subchapters 02D and 02Q, and other applicable Laws.

Pursuant to Title 15A NCAC, Subchapter 02Q, the Permittee shall not construct, operate, or modify any emission source(s) or air pollution control device(s) without having first submitted a complete Air Quality Permit Application to the permitting authority and received an Air Quality Permit, except as provided in this permit.

|                                   |                                                             |
|-----------------------------------|-------------------------------------------------------------|
| <b>Permittee:</b>                 | <b>Enviva Pellets Northampton, LLC</b>                      |
| <b>Facility ID:</b>               | <b>6600167</b>                                              |
| <b>Facility Site Location:</b>    | <b>309 Enviva Boulevard</b>                                 |
| <b>City, County, State, Zip:</b>  | <b>Garysburg, Northampton County, North Carolina, 27831</b> |
| <b>Mailing Address:</b>           | <b>7200 Wisconsin Avenue</b>                                |
| <b>City, State, Zip:</b>          | <b>Bethesda, Maryland 20814</b>                             |
| <b>Application Number:</b>        | <b>6600167.18A</b>                                          |
| <b>Complete Application Date:</b> | <b>October 1, 2018 and April 1, 2019</b>                    |
| <b>Primary SIC Code:</b>          | <b>2499</b>                                                 |
| <b>Division of Air Quality,</b>   | <b>Raleigh Regional Office</b>                              |
| <b>Regional Office Address:</b>   | <b>3800 Barrett Drive</b>                                   |
|                                   | <b>Raleigh, North Carolina, 27609</b>                       |



## Table Of Contents

SECTION 1: PERMITTED EMISSION SOURCE (S) AND ASSOCIATED  
AIR POLLUTION CONTROL DEVICE (S) AND APPURTENANCES

SECTION 2: SPECIFIC LIMITATIONS AND CONDITIONS

- 2.1- Emission Source(s) Specific Limitations and Conditions  
(Including specific requirements, testing, monitoring, recordkeeping, and  
reporting requirements)
- 2.2- Multiple Emission Source(s) Specific Limitations and Conditions  
(Including specific requirements, testing, monitoring, recordkeeping, and  
reporting requirements)
- 2.3- Construction Schedule

SECTION 3: GENERAL PERMIT CONDITIONS

## SECTION 1- PERMITTED EMISSION SOURCE(S) AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S) AND APPURTENANCES

The following table contains a summary of all permitted emission sources and associated air pollution control devices and appurtenances:

| <b>Emission Source ID No.</b> | <b>Emission Source Description</b>                                                  | <b>Control Device ID No.</b>                                                 | <b>Control Device Description</b>                                                                                                                                                                                                                                                                                                                                                              |
|-------------------------------|-------------------------------------------------------------------------------------|------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ES-GWHS                       | Green wood handling and storage                                                     | NA                                                                           | NA                                                                                                                                                                                                                                                                                                                                                                                             |
| ES-GHM-1 through ES-GHM-5     | Five green hammermills                                                              | CD-WESP-1 and<br><br>CD-RTO-1<br><br>OR<br><br>CD-WESP-2 and<br><br>CD-RTO-2 | One wet electrostatic precipitator (29,904 square feet of total collection plate area)<br><br>One propane or natural gas-fired regenerative thermal oxidizer (32 million Btu per hour)<br><br>OR<br><br>One wet electrostatic precipitator (29,904 square feet of total collection plate area)<br><br>One propane or natural gas-fired regenerative thermal oxidizer (32 million Btu per hour) |
| ES-DRYER-1                    | Direct heat, wood-fired dryer (175.3 million Btu per hour heat input, 71.71 ODT/hr) | CD-WESP-1 and<br><br>CD-RTO-1                                                | One wet electrostatic precipitator (29,904 square feet of total collection plate area)<br><br>One propane or natural gas-fired regenerative thermal oxidizer (32 million Btu per hour)                                                                                                                                                                                                         |
| ES-DRYERBYP-1                 | Dryer 1 bypass                                                                      | NA                                                                           | NA                                                                                                                                                                                                                                                                                                                                                                                             |
| ES-FURNACEBYP-1               | Furnace 1 bypass                                                                    | NA                                                                           | NA                                                                                                                                                                                                                                                                                                                                                                                             |
| ES-DRYER-2                    | Direct heat, wood-fired dryer (180 million Btu per hour heat input, 82.1 ODT/hr)    | CD-WESP-2 and<br><br>CD-RTO-2                                                | One wet electrostatic precipitator (29,904 square feet of total collection plate area)<br><br>One propane or natural gas-fired regenerative thermal oxidizer (32 million Btu per hour)                                                                                                                                                                                                         |
| ES-DRYERBYP-2                 | Dryer 2 bypass                                                                      | NA                                                                           | NA                                                                                                                                                                                                                                                                                                                                                                                             |
| ES-FURNACEBYP-2               | Furnace 2 bypass                                                                    | NA                                                                           | NA                                                                                                                                                                                                                                                                                                                                                                                             |
| ES-DWH-1                      | Dried wood handling                                                                 | CD-DWH-BF-1                                                                  | Bagfilter (2,577 square feet of filter area)                                                                                                                                                                                                                                                                                                                                                   |
| ES-DWH-2                      | Dried wood handling                                                                 | CD-DWH-BF-2                                                                  | Bagfilter (2,577 square feet of filter area)                                                                                                                                                                                                                                                                                                                                                   |
| ES-PS-1 and ES-PS-2           | Dry hammermills pre-screeners 1 and 2                                               | NA                                                                           | NA                                                                                                                                                                                                                                                                                                                                                                                             |

| <b>Emission Source ID No.</b> | <b>Emission Source Description</b> | <b>Control Device ID No.</b>                                                                          | <b>Control Device Description</b>                                                                                                                                                                                                                                                                                                              |
|-------------------------------|------------------------------------|-------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ES-HM-1 through ES-HM-8       | Eight dry hammermills              | CD-HM-CYC-1 through 8, and<br><br>CD-HM-BF-1 through CD-HM-3, and<br><br>CD-WS-1, and<br><br>CD-RCO-1 | Eight simple cyclones (120 inches in diameter each)<br><br>Three bagfilters (6,250 square feet of filter area each)<br><br>One wet scrubber (1,485 gallons per minute)<br><br>One propane or natural gas-fired regenerative catalytic oxidizer (19.6 million Btu per hour heat input) that can also operate as a regenerative thermal oxidizer |
| ES-DCS                        | Dust control system                | CD-HM-BF-3, and<br><br>CD-WS-1, and<br><br>CD-RCO-1                                                   | One bagfilter (6,250 square feet of filter area)<br><br>One wet scrubber (1,485 gallons per minute)<br><br>One propane or natural gas-fired regenerative catalytic oxidizer (19.6 million Btu per hour heat input) that can operate as a regenerative thermal oxidizer                                                                         |
| ES-DLC-1                      | Dry line feed conveyor             | NA                                                                                                    | NA                                                                                                                                                                                                                                                                                                                                             |
| ES-DSR                        | Dry shavings reception             | CD-DSR-BF                                                                                             | One bagfilter (2,577 square feet of filter area)                                                                                                                                                                                                                                                                                               |
| ES-DSS                        | Dry shavings silo                  | CD-DSS-BF                                                                                             | One bagfilter (88 square feet of filter area)                                                                                                                                                                                                                                                                                                  |
| ES-DSHM-1 and ES-DSHM-2       | Dry shavings hammermill 1 and 2    | CD-WS-1, and<br><br>CD-RCO-1                                                                          | One wet scrubber (1,485 gallons per minute)<br><br>One propane or natural gas-fired regenerative catalytic oxidizer (19.6 million Btu per hour heat input) that can operate as a regenerative thermal oxidizer                                                                                                                                 |
| ES-PMFS                       | Pellet feed mill silo              | CD-PMFS-BV                                                                                            | One bin vent filter (377 square feet of filter area)                                                                                                                                                                                                                                                                                           |

| <b>Emission Source ID No.</b> | <b>Emission Source Description</b> | <b>Control Device ID No.</b>                                          | <b>Control Device Description</b>                                                                                                                                                                                                                                             |
|-------------------------------|------------------------------------|-----------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ES-CLR-1 through<br>ES-CLR-6  | Pellet coolers                     | CD-CLR-1 through<br>CD-CLR-6, and<br><br>CD-WS-2, and<br><br>CD-RCO-2 | Six high efficiency cyclones (54 inches in diameter each)<br><br>One wet scrubber (990 gallons per minute)<br><br>One propane or natural gas-fired regenerative catalytic oxidizer (19.6 million Btu per hour heat input) that can operate as a regenerative thermal oxidizer |
| ES-PCHP                       | Pellet cooler fines relay system   | CD-PCHP-BV                                                            | One bagfilter (780 square feet of filter area)                                                                                                                                                                                                                                |
| ES-FPH                        | Finished product handling          | CD-FPH-BF                                                             | One bagfilter (4,842 square feet of filter area)                                                                                                                                                                                                                              |
| ES-PB-1 through<br>ES-PB-12   | Twelve (12) pellet load-out bins   |                                                                       |                                                                                                                                                                                                                                                                               |
| ES-PL-1<br>ES-PL-2            | Pellet mill load-out 1 and 2       |                                                                       |                                                                                                                                                                                                                                                                               |

## **SECTION 2 - SPECIFIC LIMITATIONS AND CONDITIONS**

### **2.1- Emission Source(s) and Control Devices(s) Specific Limitations and Conditions**

The emission source(s) and associated air pollution control device(s) and appurtenances listed below are subject to the following specific terms, conditions, and limitations, including the testing, monitoring, recordkeeping, and reporting requirements as specified herein:

#### **A. Green wood handling and storage (ID No. ES-GWHS)**

**Five (5) green hammermills (ID Nos. ES-GHM-1 through ES-GHM-5) controlled by a wet electrostatic precipitator (ID No. CD-WESP-1) and a regenerative thermal oxidizer (ID No. CD-RTO-1) or controlled by a wet electrostatic precipitator (ID No. CD-WESP-2) and a regenerative thermal oxidizer (ID No. CD-RTO-2);**

**Wood-fired direct heat drying system (ID No. ES-DRYER-1) controlled by a wet electrostatic precipitator (ID No. CD-WESP-1) and a regenerative thermal oxidizer (ID No. CD-RTO-1);**

**Dryer 1 bypass (ID No. ES-DRYERBYP-1) and Furnace 1 bypass (ID No. ES-FURNACEBYP-1);**

**Wood-fired direct heat drying system (ID No. ES-DRYER-2) controlled by a wet electrostatic precipitator (ID No. CD-WESP-1) and a regenerative thermal oxidizer (ID No. CD-RTO-2);**

**Dryer 2 bypass (ID No. ES-DRYERBYP-2) and Furnace 2 bypass (ID No. ES-FURNACEBYP-2);**

**Dry wood handling (ID No. ES-DWH-1) with associated bagfilter (ID No. CD-DWH-BF-1);**

**Dry wood handling (ID No. ES-DWH-2) with associated bagfilter (ID No. CD-DWH-BF-2);**

**Two (2) dry hammermill pre-screensers (ID No. ES-PS-1 and ES-PS-2);**

**Eight (8) hammermills (ID Nos. ES-HM-1 through ES-HM-8) with associated cyclones (ID Nos. CD-HM-CYC-1 through CD-HM-CYC-8) in series with three bagfilters (ID Nos. CD-HM-BF-1 through CD-HM-BF-3) in series with a wet scrubber (CD-WS-1) in series with a regenerative catalytic oxidizer (ID No. CD-RCO-1) that can also operate as a regenerative thermal oxidizer;**

**Dust control system (ID No. ES-DCS) with associated bagfilter (ID No. CD-HM-BF-3) in series with a wet scrubber (CD-WS-1) in series with a regenerative catalytic oxidizer (ID No. CD-RCO-1) that can also operate as a regenerative thermal oxidizer;**

**Dry line feed conveyor (ID No. ES-DLC-1);**

**Dry shavings reception (ID No. ES-DSR) with associated bagfilter (ID No. CD-DSR-BF);**

**Dry shavings silo (ID No. ES-DSS) with associated bagfilter (ID No. CD-DSS-BF);**

**Two dry shavings hammermills (ID Nos. ES-DSHM-1 and ES-DSHM-2) controlled by a wet scrubber (CD-WS-1) in series with a regenerative catalytic oxidizer (ID No. CD-RCO-1) that can also operate as a regenerative thermal oxidizer;**

**Pellet mill feed silo (ID No. ES-PMFS) with associated bin vent filter (ID No. CD-PMFS-BV);**

**Pellet coolers (ID Nos. ES-CLR-1 through ES-CLR-6) with associated cyclones (ID Nos. CD-CLR-1 through CD-CLR-6) in series with a wet scrubber (CD-WS-2) in series with a regenerative catalytic oxidizer (ID No. CD-RCO-2) that can also operate as a regenerative thermal oxidizer;**

**Pellet cooler fines relay system (ID No. ES-PCHP) with associated bagfilter (ID No. CD-PCHP-BF);**

**Finished product handling (ID No. ES-FPH), pellet load-out bins (ID Nos. ES-PB-1 through ES-PB-12), and pellet mill load-outs (ID Nos. ES-PL-1 and ES-PL-2) with associated bagfilter (ID No. CD-FPH-BF)**

The following table provides a summary of limits and standards for the emission source(s) described above:

| Regulated Pollutant                                        | Limits/Standards                                                                                                                                                                               | Applicable Regulation                                          |
|------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| Particulate matter                                         | $E = 4.10 \times P^{0.67}$ for $P < 30$ tph<br>$E = 55 \times P^{0.11} - 40$ for $P \geq 30$ tph<br><br>where, E = allowable emission rate (lb/hr)<br>P = process weight rate (tph)            | 15A NCAC 02D .0515                                             |
| Sulfur dioxide                                             | <i>ID Nos. ES-DRYER-1 and ES-DRYER-2 only:</i><br>2.3 pounds per million Btu                                                                                                                   | 15A NCAC 02D .0516                                             |
| Visible emissions                                          | 20 percent opacity when averaged over a 6-minute period                                                                                                                                        | 15A NCAC 02D .0521                                             |
| n/a                                                        | Excess emissions reporting and malfunctions                                                                                                                                                    | 15A NCAC 02D .0535                                             |
| Fugitive dust                                              | State-enforceable only<br>Minimize fugitive dust beyond property boundary<br>See Section 2.2 A.1.                                                                                              | 15A NCAC 02D .0540                                             |
| Volatile organic compounds (VOC), and Carbon monoxide (CO) | Less than 456.4 tons of VOC and 250 tons of CO per consecutive 12-month period, See Section 2.2 A.2.                                                                                           | 15A NCAC 02Q .0317 for avoidance of 15A NCAC 02D .0530         |
| PM/PM10/PM2.5<br>VOC<br>NOx<br>CO                          | Less than 250 tons per 12-month period,<br>Less than 250 tons per 12-month period,<br>Less than 250 tons per 12-month period<br>Less than 250 tons per 12-month period<br>See Section 2.2 A.3. | 15A NCAC 02Q .0317 for avoidance of 15A NCAC 02D .0530         |
| Hazardous Air Pollutants (HAP)                             | See Section 2.2 A.4.                                                                                                                                                                           | 15A NCAC 02Q .0317 for avoidance of 15A NCAC 02D .1111<br>MACT |
| Toxic air pollutants                                       | State-enforceable only<br>See Section 2.2 A.5. and 2.2 A.6.                                                                                                                                    | 15A NCAC 02D .1100                                             |
| Toxic air pollutants                                       | State-enforceable only<br>See Section 2.2 A.7.                                                                                                                                                 | 15A NCAC 02D .0711                                             |

# 1. 15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

- a. Emissions of particulate matter from these sources shall not exceed an allowable emission rate as calculated by the following equation:

$$E = 4.10 \times P^{0.67} \quad \text{for } P < 30 \text{ tph}$$

$$E = 55 \times P^{0.11} - 40 \quad \text{for } P \geq 30 \text{ tph}$$

Where E = allowable emission rate in pounds per hour  
P = process weight in tons per hour

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

## **Testing** [15A NCAC 02Q .0308(a)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition 17.

- c. Under the provisions of North Carolina General Statute 143-215.108, the Permittee shall demonstrate compliance with emission limit in Section 2.1 A.1.a for the wood-fired direct heat drying systems (**ID Nos. ES-DRYER-1 and ES-DRYER-2**), green hammermills (**ID Nos. ES-GHM-1 through ES-GHM-5**), the dry hammermills (**ID Nos. ES-HM-1 through ES-HM-8**) and pellet coolers (**ID Nos. ES-CLR-1 through CLR-6**). Testing shall be conducted as specified in Section 2.2 A.2.

**Monitoring** [15A NCAC 02Q .0308(a)]

*For baghouses and/or cyclones:*

- d. Particulate matter emissions shall be controlled as follows:
- i. Particulate matter emissions from the dry wood handling operations (**ID Nos. ES-DWH-1 and ES-DWH-2**) shall be controlled by baghouses (**ID Nos. CD-DWH-BF-1 and CD-DWH-BF-2**);
  - ii. Particulate matter emission from eight (8) dry hammermills (**ID Nos. ES-HM-1 through ES-HM-8**) shall be controlled by cyclones (**ID Nos. CD-HM-CYC-1 through CD-HM-CYC-8**) in series with baghouses (**ID Nos. CD-HM-BH1 through CD-HM-BH3**);
  - iii. Particulate matter emission from the dust control system (**ID No. ES-DCS**) shall be controlled by baghouse (**ID No. CD-HM-BF-3**);
  - iv. Particulate matter emissions from the dry shavings reception (**ID No. ES-DSR**) shall be controlled by a baghouse (**ID No. CD-DSR-BF**);
  - v. Particulate matter emissions from the dry shavings silo (**ID No. ES-DSS**) shall be controlled by a baghouse (**ID No. CD-DSS-BF**);
  - vi. Particulate matter emissions from the pellet mill feed silo (**ID No. ES-PMFS**) shall be controlled by baghouse (**ID No. CD-PMFS-BV**);
  - vii. Particulate matter emissions from the pellet coolers (**ID Nos. ES-CLR-1 through CLR-6**) shall be controlled cyclones (**ID Nos. CD-CLR-1 through CD-CLR-6**);
  - viii. Particulate matter emissions from pellet cooler fines relay system (**ID No. ES-PCHP**) shall be controlled by baghouse (**ID No. CD-PCHP-BV**);
  - xi. Particulate matter emissions from finished product handling (**ID No. ES-FPH**), pellet load-out bins (**ID Nos. ES-PB-1 through PB-12**), and pellet mill load-out (**ID No. ES-PL-1 and PL-2**) shall be controlled by baghouse (**ID No. CD-FPH-BF**).
- e. To ensure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there are no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:
- i. a monthly visual inspection of the system ductwork and material collection units for leaks; and
  - ii. an annual (for each 12-month period following the initial inspection) internal inspection of the baghouses' structural integrity.

*For wet electrostatic precipitator, wet scrubbers, and regenerative thermal or catalytic oxidizers:*

- f. Particulate matter emissions shall be controlled as follows:
- i. Particulate matter emissions from the green hammermills (**ID Nos. ES-GHM-1, through ES-GHM-5**) shall be controlled by a wet electrostatic precipitator (**ID No. CD-WESP-1**) in series with a regenerative thermal oxidizer (**ID No. CD-RTO-1**) or controlled by a wet electrostatic precipitator (**ID No. CD-WESP-2**) in series with a regenerative thermal oxidizer (**ID No. CD-RTO-2**);
  - ii. Particulate matter emissions from the wood-fired direct heat drying system (**ID No. ES-DRYER-1**) shall be controlled by a wet electrostatic precipitator (**ID No. CD-WESP-1**) in series with a regenerative thermal oxidizer (**ID No. CD-RTO-1**);
  - iii. Particulate matter emissions from the wood-fired direct heat drying system (**ID No. ES-DRYER-2**) shall be controlled by a wet electrostatic precipitator (**ID No. CD-WESP-2**) in series with a regenerative thermal oxidizer (**ID No. CD-RTO-2**);
  - iv. Particulate matter emissions from the eight (8) dry hammermills (**ID Nos. ES-HM-1 through**

- ES-HM-8)** shall be controlled by a wet scrubber (**ID No. CD-WS-1**) in series with a regenerative catalytic/thermal oxidizer (**ID No. CD-RCO-1**);
- v. Particulate matter emissions from pellet coolers (**ID Nos. ES-CLR-1 through CLR-6**) shall be controlled by a wet scrubber (**ID No. CD-WS-2**) in series with a regenerative catalytic/thermal oxidizer (**ID No. CD-RCO-2**);
- g. To ensure compliance and effective operation of the wet electrostatic precipitators (**ID No. CD-WESP-1 and CD-WESP-2**), the Permittee shall:
- operate the wet electrostatic precipitator with at least the minimum number of grids operating during compliance testing specified in Section 2.2 A.2;
  - maintain the minimum secondary voltage and minimum current at the level established during compliance testing specified in Section 2.2 A.2;
  - monitor and record the secondary voltage and current for each grid of the precipitator daily. The daily observation must be made for each day of the calendar year period. The Permittee shall be allowed three (3) days of absent observations per semiannual period.
- h. To ensure compliance and effective operation of the wet scrubbers (**ID No. CD-WS-1 and CD-WS-2**), the Permittee shall maintain the required minimum liquid recirculation rate at the level established during compliance testing as specified in Section 2.2 A.2. The Permittee shall monitor and record the required minimum liquid recirculation rate daily. The daily observation must be made for each day of the calendar year period. The Permittee shall be allowed three (3) days of absent observations per semiannual period.
- i. To ensure compliance, the Permittee shall perform inspections and maintenance on the wet electrostatic precipitators (**ID Nos. CD-WESP-1 and CD-WESP-2**), the wet scrubbers (**ID Nos. CD-WS-1 and CD-WS-2**), the regenerative thermal oxidizers (**ID Nos. CD-RTO-1 and CD-RTO-2**), and the regenerative catalytic/thermal oxidizers (**ID Nos. CD-RCO-1 and CD RCO-2**) as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there are no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:
- a monthly visual inspection of the system ductwork and material collection units for leaks;
  - an annual (for each 12-month period following the initial inspection) internal inspection of the heat transfer medium and associated inlet/outlet valves on the regenerative thermal and catalytic oxidizers (**ID No. CD-RTO-1, CD-RTO-2, CD-RCO-1 and CD RCO-2**); and
  - an annual (for each 12-month period following the initial inspection) internal inspection of the wet electrostatic precipitators (**ID No. CD-WESP1 and CD-WESP-2**). This inspection must include (but is not limited to) the following:
    - visual checks of critical components,
    - checks for any equipment that does not alarm when de-energized, to ensure it is operational,
    - checks for signs of plugging in the hopper and gas distribution equipment, and
    - replacement of broken equipment as required.
  - an annual (for each 12-month period following the initial inspection) internal inspection of spray nozzles and the cleaning/calibration of all associated instrumentation on the wet scrubbers (**ID Nos. CD-WS-1 and CD-WS-2**).

**Recordkeeping** [15A NCAC 02Q .0308(a)]

- j. The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
- the date and time of each recorded action;
  - the results of each inspection;
  - the results of any maintenance performed on the control devices; and
  - any variance from manufacturer's recommendations, if any, and corrections made.



**Reporting** [15A NCAC 02Q .0308(a)]

- k. The Permittee shall submit the results of any maintenance performed on any control device within 30 days of a written request by the DAQ.
- l. The Permittee shall submit a summary report of the monitoring and recordkeeping activities given in Sections 2.1 A.1.d through j above postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**2. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES**

- a. Emissions of sulfur dioxide from these sources (**ID Nos. ES-DRYER-1 and ES-DRYER-2**) shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard.

**Testing** [15A NCAC 02Q .0308(a)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition 17.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 02Q .0308(a)]

- c. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the firing of biomass in the wood-fired direct heat drying systems (**ID Nos. ES-DRYER-1 and ES-DRYER-2**).

**3. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from these sources shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.

**Testing** [15A NCAC 02Q .0308(a)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition 17.

**Monitoring** [15A NCAC 02Q .0308(a)]

- c. To ensure compliance, once a week the Permittee shall observe the emission points of these sources for any visible emissions above normal. The weekly observation must be made for each week of the calendar year period to ensure compliance with this requirement. For all new emission sources or control devices listed in the above table, the Permittee shall establish "normal" in the first 30 days following the commencement of operation. If visible emissions from these sources are observed to be above normal, the Permittee shall either:
  - i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
  - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 A.3.a above.

**Recordkeeping** [15A NCAC 02Q .0308(a)]

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;

- ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
- iii. the results of any corrective actions performed.

**Reporting** [15A NCAC 02Q .0308(a), 15A NCAC 02D .0605(b)(3)]

- e. The Permittee shall submit a summary report of the monitoring and recordkeeping activities given in Sections 2.1 A.3.c and d above postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**4. 15A NCAC 02D .0535: EXCESS EMISSIONS REPORTING AND MALFUNCTIONS**

- 1. **NOTIFICATION REQUIREMENT** - As required by 15A NCAC 2D .0535, the Permittee of a source of excess emissions that last for more than four hours and that results from a malfunction, a breakdown of process or control equipment or any other abnormal conditions, shall:
  - a. Notify the Director or his designee of any such occurrence by 9:00 a.m. Eastern time of the Division's next business day of becoming aware of the occurrence and describe:
    - i. the name and location of the facility,
    - ii. the nature and cause of the malfunction or breakdown,
    - iii. the time when the malfunction or breakdown is first observed,
    - iv. the expected duration, and
    - v. an estimated rate of emissions.
  - b. Notify the Director or his designee immediately when the corrective measures have been accomplished.

This reporting requirement does not allow the operation of the facility in excess of Environmental Management Commission Regulations.

## 2.2- Multiple Emission Source(s) Specific Limitations and Conditions

### A. Facility-wide Emission Sources

The following table provides a summary of limits and standards for the emission source(s) describe above:

| Regulated Pollutant               | Limits/Standards                                                                                                                                                       | Applicable Regulation                                       |
|-----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|
| Fugitive dust                     | State-enforceable only<br>Minimize fugitive dust beyond property boundary                                                                                              | 15A NCAC 02D .0540                                          |
| VOC<br>CO                         | Less than 456.4 tons per 12-month period<br>Less than 250 tons per 12-month period                                                                                     | 15A NCAC 02Q .0317 for avoidance of 15A NCAC 02D .0530      |
| PM/PM10/PM2.5<br>VOC<br>NOx<br>CO | Less than 250 tons per 12-month period,<br>Less than 250 tons per 12-month period,<br>Less than 250 tons per 12-month period<br>Less than 250 tons per 12-month period | 15A NCAC 02Q .0317 for avoidance of 15A NCAC 02D .0530      |
| Hazardous Air Pollutants (HAP)    | Less than 25 tons for combined HAPs per 12-month period<br>Less than 10 tons for single a HAP per 12-month period.                                                     | 15A NCAC 02Q .0317 for avoidance of 15A NCAC 02D .1111 MACT |
| Toxic air pollutants              | State-enforceable only<br>Less than modeled emission rates                                                                                                             | 15A NCAC 02D .1100                                          |
| Toxic air pollutants              | State-enforceable only<br>Less than toxic permitted emission rates                                                                                                     | 15A NCAC 02D .0711                                          |

| Regulated Pollutant | Limits/Standards                                                  | Applicable Regulation |
|---------------------|-------------------------------------------------------------------|-----------------------|
| Odor                | State-enforceable only odor control                               | 15A NCAC 02D .1806    |
| N/A                 | Annual Emission Reporting due June 30                             | 15A NCAC 02Q .0207    |
| N/A                 | Permit renewal application due 90 days prior to permit expiration | 15A NCAC 02Q .0304    |
| N/A                 | Option for obtaining construction and operation permit            | 15A NCAC 02Q .0504    |

**State-enforceable only****1. 15A NCAC 02D .0540: PARTICULATES FROM FUGITIVE DUST EMISSION SOURCES**

As required by 15A NCAC 02D .0540 "Particulates from Fugitive Dust Emission Sources," the Permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary. If substantive complaints or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR, Appendix A), the owner or operator may be required to submit a fugitive dust plan as described in 02D .0540(f).

"Fugitive dust emissions" means particulate matter from process operations that does not pass through a process stack or vent and that is generated within plant property boundaries from activities such as: unloading and loading areas, process areas stockpiles, stock pile working, plant parking lots, and plant roads (including access roads and haul roads).

**2. 15A NCAC 02Q .0317: AVOIDANCE CONDITIONS  
for 15A NCAC 02D .0530: PREVENTION OF SIGNIFICANT DETERIORATION**

- a. The following conditions in this section are enforceable until all of the requirements from Section 2.3 A., "Actions to be Taken by the Permittee", have been met. Until such time as this condition (Section 2.2. A.2) is no longer applicable, the facility remains classified as PSD major.
- b. In order to avoid applicability of 15A NCAC 2D .0530(g), facility-wide emission sources shall discharge into the atmosphere less than 456.4 tons of volatile organic compounds (VOC) and 250 tons of carbon monoxide (CO) per consecutive 12-month period. To ensure compliance with the above limitations, the Permittee shall:
  - i. not process more than 537,625 oven-dried tons (ODT) of wood per year with an average maximum of 30% softwood from the wood-fired dryer system (**ID No. ES-DRYER-1**); and
  - ii. not process more than 531,441 ODT of wood per year with an average maximum of 30% softwood from the dry hammermill system (**ID No. ES-HM-1 through ES-HM-8**); and
  - iii. not process more than 625,225 ODT of pellets per year with an average maximum of 30% softwood from the pellet cooler system (**ID No. ES-CLR-1 through ES-CLR-6**).

**Monitoring and Recordkeeping [15A NCAC 02Q .0308(a)]**

- c. The Permittee shall demonstrate compliance with the facility-wide VOC and CO emission limitations by calculating the rolling 12-month annual facility-wide VOC and CO emissions on a monthly basis (by the 30<sup>th</sup> day following the end of each calendar month) as follows. The VOC and CO emissions shall be calculated in a manner consistent with the calculation methodologies in the air permit supporting this limitation. Emission factors used in the calculations for each source shall be appropriate for the annual average softwood content that has been processed in the previous 12-month period. All emission factors used shall be reviewed and approved by DAQ.

- i. The process rates and percent softwood from the dryer, dry hammermill, and pellet cooler systems shall be recorded monthly in a logbook (written or electronic format) kept on-site and made available to an authorized representative upon request.
- ii. Calculations of CO emissions from the dryer system (ID No. ES-DRYER-1) shall be made at the end of each month. CO emissions shall be determined by multiplying the approved CO emission factor (0.023 lb/ODT) by the process rate.
- iii. Calculations and the facility-wide VOC and dryer CO emissions shall be recorded monthly in a log (written or electronic format).

**Reporting Requirements [15A NCAC 02Q .0308(a)]**

- d. The Permittee shall submit the results of any maintenance performed on the wet electrostatic precipitator, cyclones, and/or baghouses within 30 days of a written request by the DAQ.
- e. The Permittee shall submit a semi-annual summary report, acceptable to the Regional Air Quality Supervisor, of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December, and July 30 of each calendar year for the preceding six-month period between January and June. The report shall contain the following:
  - i. The monthly VOC and CO emissions for the previous 17 months. The emissions must be calculated for each of the 12-month periods over the previous 17 months.
  - ii. The monthly ODT of pellets per year for the previous 17 months.
  - iii. The monthly hardwood/softwood mix for the previous 17 months.
  - iv. The 30 day rolling average product moisture content.

**3. 15A NCAC 02Q .0317: AVOIDANCE CONDITIONS  
for 15A NCAC 02D .0530: PREVENTION OF SIGNIFICANT DETERIORATION**

- a. The following conditions in this section are enforceable after all of the requirements from Section 2.3 A., "Actions to be Taken by the Permittee", have been met. Following the applicability of this condition (Section 2.2 A.3), the facility will be classified as PSD minor.
- b. In order to avoid applicability of 15A NCAC 2D .0530(g), facility-wide emission sources shall discharge into the atmosphere less than 250 tons of particulate matter, particulate matter 10 micrometers, particulate matter 2.5 micrometers, volatile organic compounds (VOC), nitrogen oxides (NO<sub>x</sub>), and carbon monoxide (CO) per consecutive 12-month period.
- c. To ensure that the limits established above are not exceeded,
  - i. the facility will not process more than 781,255 oven dried tons per year (ODT/year) with a maximum of 80% softwood, on a rolling 12-month average basis;
  - ii. the green hammermills and wood dryers will be controlled by wet electrostatic precipitators (ID No. CD-WESP-1 and CD-WESP-2) in series with regenerative thermal oxidizers (ID No. CD-RTO-1 and CD-RTO-2);
  - iii. dry hammermills will not process more than 85% of the maximum facility throughput or a total of 664,067 oven dried tons per year (ODT/year) on a rolling 12-month average basis;
  - iv. the dry hammermills will be controlled by three bagfilters (ID Nos. CD-HM-BF-1 through CD-HM-BF3) in series with a wet scrubber (ID No. CD-WS-1) in series with a regenerative catalytic oxidizer (ID No. CD-RCO-1) that can also operate as a regenerative thermal oxidizer;
  - v. the dry shavings hammermills (ID Nos. ES-DSHM-1 and ES-DSHM-2) shall be controlled by a wet scrubber (ID No. CD-WS-1) in series with a regenerative catalytic oxidizer (ID No. CD-RCO-1) that can also operate as a regenerative thermal oxidizer;
  - vi. the pellet coolers will be controlled by a wet scrubber (ID No. CD-WS-2) in series with a regenerative catalytic oxidizer (ID No. CD-RCO-2) that can also operate as a regenerative thermal oxidizer;
  - vii. Reserved.

- viii. the furnace bypasses (**ID Nos. ES-FURNACEBYP-1 and ES-FURNACEBYP-2**) shall be limited to less than 50 hours per year per furnace for start-ups (for temperature control) and shutdowns. The furnace bypasses shall not be utilized at the same time and be limited to a cold startup of 15% maximum heat input or 26.3 million Btu/hr for furnace 1 and 27.0 million Btu/hr for furnace 2. The cold startup period of time begins when a wood-fired furnace is started up and lasts until the wood-fired furnace's refractory is heated to a temperature sufficient to sustain combustion operations at a minimal level or 8 hours, whichever is less;
- ix. the furnace bypasses (**ID Nos. ES-FURNACEBYP-1 and ES-FURNACEBYP-2**) in idle mode, defined as maximum heat input of 5 million Btu per hour each, shall be limited to less than 500 hours per year per furnace.
- x. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate all emission sources including associated control devices in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

**Notifications** [15A NCAC 02Q .0308(a)]

- d. The completion of the modification is defined as the installation of equipment that allow throughput of up to 781,255 ODT/year on an annual basis, and
    - i. the rerouting of the exhaust from the wood-fired direct heat drying system (**ID No. ES-DRYER-1**) to the wet electrostatic precipitator (**ID No. CD-WESP-1**) and the regenerative thermal oxidizer (**ID No. CD-RTO-1**).
    - ii. the rerouting of the exhaust from the dry hammermills (**ID Nos. ES-HM-1 to ES-HM-8**) and bagfilters (**ID Nos. CD-HM-BH1 through CD-HM-BH3**) to wet scrubber (**ID No. CD-WS-1**) and the regenerative catalytic/thermal oxidizer (**ID No. CD-RCO-1**).
    - iii. the rerouting of the exhaust from the pellet coolers (**ID Nos. ES-CLR-1 through ES-CLR-6**) to wet scrubber (**ID No. CD-WS-2**) and the regenerative catalytic/thermal oxidizer (**ID No. CD-RCO-2**).
- The Permittee shall notify the DAQ of the actual completion date of the modification postmarked within 15 days after such date.

**Testing** [15A NCAC 02Q .0308(a)]

- e. **Initial Performance Tests** – Under the provisions of North Carolina General Statute 143-215.108, the Permittee shall demonstrate compliance with PSD avoidance limits in Section 2.2 A.3.b. above by conducting an initial performance test on the green hammermills (**ID Nos. ES-GHM-1 through ES-GHM-5**), the wood-fired direct heat drying systems (**ID No. ES-DRYER-1 and ES-DRYER-2**), the dry hammermills (**ID Nos. ES-HM-1 to ES-HM-8**), the dry shavings hammermills (**ID Nos. ES-DSHM-1 and ES-DSHM-2**), and the pellet coolers (**ID Nos. ES-CLR-1 through ES-CLR-6**). Initial testing shall be conducted in accordance with the following:
  - i. The pollutants and emission sources to be tested during the initial performance test are listed in the following table:

| Emission Sources                                      | Pollutant       |
|-------------------------------------------------------|-----------------|
| Green hammermills and dryer system controlled via RTO | VOC             |
|                                                       | PM/PM10/PM2.5   |
|                                                       | NO <sub>x</sub> |
|                                                       | CO              |
| Dry and dry shavings hammermills controlled via RCO   | VOC             |
|                                                       | PM/PM10/PM2.5   |
| Pellet coolers controlled                             | VOC             |

| <b>Emission Sources</b> | <b>Pollutant</b> |
|-------------------------|------------------|
| via RCO                 | PM/PM10/PM2.5    |

- ii. The Permittee shall conduct initial compliance testing in accordance with a testing protocol approved by the DAQ.
  - iii. The Permittee shall submit a protocol to DAQ at least 45 days prior to initial compliance testing and shall submit a notification of initial compliance testing at least 15 days in advance of the testing.
  - iv. The regenerative thermal oxidizer/regenerative catalytic oxidizer (**ID Nos. CD-RTO-1, CD-RTO-2, CD-RCO-1 and CD-RCO-2**) are comprised of one or more fireboxes per oxidizer, each containing two temperature probes. During the initial compliance test, the Permittee shall establish the minimum average firebox temperature for each firebox(s) comprising each regenerative thermal oxidizer/regenerative catalytic oxidizer (**ID Nos. CD-RTO-1, CD-RTO-2, CD-RCO-1 and CD-RCO-2**), for an average temperature for each firebox per regenerative thermal/catalytic oxidizer. "Average firebox temperature" means the average temperature of the two temperature probes in each firebox. The minimum average firebox temperature for each firebox shall be based upon the average temperature of the two temperature probes over the span of the test runs. Documentation for the minimum average firebox temperature for each firebox shall be submitted to the DAQ as part of the initial compliance test report.
  - v. Testing shall be completed within 180 days of commencement of operation of the new equipment.
  - vi. The Permittee shall submit a written report of the test results to the Regional Supervisor, DAQ, within 60 days of completion of the test.
- f. Periodic Performance Tests – Under the provisions of North Carolina General Statute 143-215.108, the Permittee shall demonstrate compliance with the PSD avoidance in Section 2.2 A.3.b. above by conducting periodic performance tests on the green hammermills (**ID Nos. ES-GHM-1 through ES-GHM-5**), the wood-fired direct heat drying systems (**ID No. ES-DRYER-1 and ES-DRYER-2**), the dry hammermills (**ID Nos. ES-HM-1 to ES-HM-8**), the dry shavings hammermills (**ID Nos. ES-DSHM-1 and ES-DSHM-2**), and the pellet coolers (**ID Nos. ES-CLR-1 through ES-CLR-6**). Periodic testing shall be conducted in accordance with the following:
- i. The pollutants and emission sources to be tested during the periodic performance tests are listed in the following table:

| <b>Emission Source</b>                                | <b>Pollutant</b> |
|-------------------------------------------------------|------------------|
| Green hammermills and dryer system controlled via RTO | VOC              |
|                                                       | PM/PM10/PM2.5    |
|                                                       | NOx              |
|                                                       | CO               |
| Dry and dry shavings hammermills controlled via RCO   | VOC              |
|                                                       | PM/PM10/PM2.5    |
| Pellet coolers controlled via RCO                     | VOC              |
|                                                       | PM/PM10/PM2.5    |

- ii. The Permittee shall conduct periodic compliance testing in accordance with a testing protocol approved by the DAQ.
- iii. The Permittee shall submit a protocol to DAQ at least 45 days prior to periodic compliance testing and shall submit a notification of periodic compliance testing at least 15 days in advance of the testing.
- iv. The Permittee shall be responsible for ensuring, within practicable limits, that the equipment or processes being tested are operated at or near the maximum normal production rate.
- v. To the extent possible, testing shall be conducted at the maximum normal operating softwood

- percentage.
- vi. The Permittee shall conduct periodic performance tests when the following conditions are met:
    - (A) The monthly average softwood content exceeds the average softwood percentage documented during prior performance testing by more than 10 percentage points, or
    - (B) The monthly production rate exceeds the average production rate documented during prior performance testing by more than 10 percentage points, or
    - (C) At a minimum testing shall be conducted annually. Annual performance tests shall be completed no later than 13 months after the previous performance test.
  - vii. The Permittee shall notify the DAQ within 15 days when the conditions specified in Section 2.2 A.3.f.vi (A) or (B) are met.
  - viii. The Permittee shall conduct the periodic performance test and submit a written report of the test results to the DAQ within 90 days from the date the monthly softwood content or overall production rate increased as described in Section 2.2 A.3.f.vi. (A) and (B) above, unless an alternate date is approved in advance by DAQ.
  - ix. When periodic performance testing has occurred at 80 percent softwood AND at 90 percent of the maximum permitted throughput, subsequent periodic performance testing shall occur on an annual basis and shall be completed no later than 13 months after the previous performance test.
  - x. The Permittee may request that the performance tests be conducted less often for a given pollutant if the performance tests for at least 3 consecutive years show compliance with the emission limit. If the request is granted, the Permittee shall conduct a performance test no more than 36 months after the previous performance test for the given pollutant.
  - xi. If a performance test shows noncompliance with an emission limit for a given pollutant, the Permittee shall return to conducting annual performance tests (no later than 13 months after the previous performance test) for that pollutant.
  - xii. Except as specified in Section 2.2 A.3.f.viii. above, the Permittee shall submit a written report of results for any periodic performance test to the DAQ, not later than 30 days after sample collection, in accordance with 15A NCAC 02D .2602(h).
  - xiii. The Permittee may re-establish any parametric operating value during periodic testing. Compliance with previously approved parametric operating values is not required during periodic required testing or other tests undertaken to re-establish parametric operating values by the Permittee.
  - xiv. The Permittee shall comply with applicable emission standards at all times, including during periods of testing.

**Monitoring and Recordkeeping: [15A NCAC 02Q .0308(a)]**

- g. The Permittee shall install, calibrate, operate, maintain, and inspect a continuous temperature monitoring, and recording system, in accordance with manufacturer's recommendations for the regenerative thermal oxidizers and the regenerative catalytic oxidizers (**ID Nos. CD-RTO-1, CD-RTO-2, CD-RCO-1, and CD-RCO-2**). To ensure compliance and effective operation of the oxidizers, the Permittee shall maintain a 3-hour rolling average firebox temperature for each firebox comprising the RTO or RCO at or above the minimum average temperatures established during the most recent performance testing. The Permittee shall maintain records of the 3-hour rolling average temperatures for each firebox. The Permittee shall also perform inspections and maintenance on the RTO as specified above in Section 2.1 A.1.i.
- h. For the oxidizers, the Permittee shall develop and maintain a malfunction plan for the temperature monitoring and recording system that describes, in detail, the operating procedures for periods of malfunctions.
- i. The Permittee shall perform periodic inspection and maintenance for the oxidizers as recommended by the manufacturer. At a minimum, the Permittee shall perform an annual internal inspection of the primary heat exchanger and associated inlet/outlet valves of the control device to ensure structural integrity.
- j. To ensure compliance and effective operation of wet scrubbers (**ID No. CD-WS-1 and CD-WS-2**), the Permittee shall perform inspections, maintenance, and maintain the required minimum recirculation rate specified above in Section 2.1 A.1.h.
- k. To ensure compliance and effective operation of the wet electrostatic precipitators (**ID No. CD-WESP-1**

**and CD-WESP-2)**, the Permittee shall perform inspections and maintenance as specified above in Section 2.1 A.1.i. The Permittee shall also maintain the minimum secondary voltage and minimum current of the wet electrostatic precipitator as specified above in Section 2.1 A.1.g.

- l. To ensure compliance and effective operation of the bagfilters and cyclones, the Permittee shall perform inspections and maintenance as specified above in Section 2.1 A.1.e.
- m. The Permittee shall not process more than 781,255 oven-dried tons (ODT) of pellets per year. The process rate shall be recorded monthly in a logbook (written or electronic format) kept on-site and made available to an authorized representative upon request.
- n. The Permittee shall record the hardwood/softwood mix monthly in a logbook (written or electronic format) kept on-site and made available to an authorized representative upon request.
- o. The Permittee shall install a time monitoring and recording system for the bypass hours on the dryers and furnaces during startup, shutdowns, and malfunctions. The bypass hours for each source shall be recorded weekly in a logbook (written or electronic format) kept on-site and made available to an authorized representative upon request. The Permittee must develop and maintain a written malfunction plan for the time monitoring and recording system that describes, in detail, the operating procedures for periods of malfunctions.
- p. To ensure compliance and effective operation of the furnace bypasses (**ID Nos. ES-FURNACEBYP-1 and ES-FURNACEBYP-2**) at idle mode, defined as maximum heat input of 5 million Btu per hour each, the Permittee shall record the hours and heat input for each source weekly in a logbook (written or electronic format) kept on-site and made available to an authorized representative upon request.
- q. The Permittee shall calculate the total emissions of NO<sub>x</sub>, filterable PM, CO, and VOC monthly and shall record the emissions monthly in a logbook (written or electronic format) kept on-site and made available to DAQ personnel upon request. Monthly NO<sub>x</sub> emissions, in tons, shall be calculated by the following equations and emission factors:

$$E_{\text{NO}_x(\text{Total})} = \sum E_{\text{NO}_x(\text{Dryer1})} + \sum E_{\text{NO}_x(\text{Dryer2})} + \sum E_{\text{NO}_x(\text{RTO1})} + \sum E_{\text{NO}_x(\text{RTO2})} + 3.94$$

$$E_{\text{NO}_x(\text{Dryer1 or Dryer2})} = \frac{(0.47 \times Q_D)}{2,000}$$

$$E_{\text{NO}_x(\text{RTO1 or RTO2})} = \left( \frac{(4.55 \times P_{\text{RTO}}) + (3.15 \times NG_{\text{RTO}})}{2,000} \right)$$

Where:

- |                                       |   |                                                                                                                                                                                                                                                                               |
|---------------------------------------|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| $E_{\text{NO}_x(\text{Total})}$       | = | total tons of NO <sub>x</sub> emissions per month from the facility.                                                                                                                                                                                                          |
| $E_{\text{NO}_x(\text{Dryer1 or 2})}$ | = | total tons of NO <sub>x</sub> emissions per month from each dryer.                                                                                                                                                                                                            |
| $E_{\text{NO}_x(\text{RTO1})}$        | = | number of tons of NO <sub>x</sub> emissions per month from RTO1 fuel combustion.                                                                                                                                                                                              |
| $E_{\text{NO}_x(\text{RTO2})}$        | = | number of tons of NO <sub>x</sub> emissions per month from RTO2 fuel combustion.                                                                                                                                                                                              |
| $Q_D$                                 | = | the oven dried tons of processed wood through the dryers per month.                                                                                                                                                                                                           |
| 0.47                                  | = | dryer line NO <sub>x</sub> emission factor of 0.47 lb/ODT is derived from the October 2013 site specific stack test of 33.48 lb/hr at a maximum throughput.                                                                                                                   |
| $P_{\text{RTO1 or RTO2}}$             | = | propane hours per month when oxidizer deemed "in operation", is not bypassed, and oxidizer temperature is greater than or equal to the hourly block average temperature specified per stack test with an emission factor of 4.55 lb/hr (from DAQ combustion spreadsheet).     |
| $NG_{\text{RTO1 or RTO2}}$            | = | natural gas hours per month when oxidizer deemed "in operation", is not bypassed, and oxidizer temperature is greater than or equal to the hourly block average temperature specified per stack test with an emission factor of 3.15 lb/hr (from DAQ combustion spreadsheet). |
| 3.94                                  | = | equates to the monthly PTE for the miscellaneous sources including; double duct burners, propane vaporizer, catalytic oxidizers, bypass stacks, emergency generators, and a fire water pump (per application 6600167.18A).                                                    |



- r. For the wood-fired direct heat drying systems (**ID Nos. ES-DRYER-1 and ES-DRYER-2**), GHG (CO<sub>2</sub>e) emissions shall be calculated on a monthly basis and compliance demonstrated using the applicable Part 98 emission factors. Compliance shall be documented on a 12-month rolling basis.

**Reporting Requirements: [15A NCAC 02Q .0308(a)]**

- s. The Permittee shall submit the results of any maintenance performed on the wet electrostatic precipitator, regenerative thermal oxidizers, regenerative catalytic oxidizers, cyclones, and/or baghouses within 30 days of a written request by the DAQ.
- t. The Permittee shall submit a semi-annual summary report, acceptable to the Regional Air Quality Supervisor, of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December, and July 30 of each calendar year for the preceding six-month period between January and June. The report shall contain the following:
  - i. The monthly PM, PM<sub>10</sub>, PM<sub>2.5</sub>, VOC, NO<sub>x</sub>, and CO emissions for the previous 17 months. The emissions must be calculated for each of the 12-month periods over the previous 17 months.
  - ii. The monthly ODT of pellets per year for the previous 17 months.
  - iii. The monthly hardwood/softwood mix for the previous 17 months.
  - iv. A report indicating and explaining all instances of the average minimum regenerative thermal oxidizer and regenerative catalytic oxidizer combustion chamber temperature falling below the minimum temperature range established during the performance test or noting that no such instances have occurred.
- u. All instances of deviations from the requirements of this permit must be clearly identified.

**4. 15A NCAC 02Q .0317: AVOIDANCE CONDITIONS**

**for 15A NCAC 02D .1111: Maximum Available Control Technology (MACT) Standards**

- a. The following conditions in this section are enforceable after all of the requirements from Section 2.3 A., "Actions to be Taken by the Permittee", have been met. Following the applicability of this condition (Section 2.2 A.3), the facility will be classified as HAP minor.
- b. In order to remain classified a minor source for hazardous air pollutants (HAP) and avoid applicability of 15A NCAC 02D .1111, "Maximum Achievable Control Technology," facility-wide HAP emissions shall be less than the following limitations:
  - a. 25 tons per consecutive 12-month period of total, combined HAP; and,
  - b. 10 tons per consecutive 12-month period of any individual HAP.

**Testing [15A NCAC 02Q .0308(a)]**

- c. **Initial Performance Tests** – Under the provisions of North Carolina General Statute 143-215.108, the Permittee shall establish emission factors for HAPs by conducting an initial performance test on the green hammermills (**ID Nos. ES-GHM-1 through ES-GHM-5**), the wood-fired direct heat drying systems (**ID No. ES-DRYER-1 and ES-DRYER-2**), the dry hammermills (**ID Nos. ES-HM-1 to ES-HM-8**), the dry shavings hammermills (**ID Nos. ES-DSHM-1 and ES-DSHM-2**), and the pellet coolers (**ID Nos. ES-CLR-1 through ES-CLR-6**). Initial testing shall be conducted in accordance with the following:
  - i. The pollutants and emission sources to be tested during the initial performance test are listed in the following table:

| <b>Emission Source</b>                                | <b>Pollutant</b>                   |
|-------------------------------------------------------|------------------------------------|
| Green hammermills and dryer system controlled via RTO | Acetaldehyde<br>Acrolein           |
| Dry and dry shavings hammermills controlled via RCO   | Formaldehyde<br>Methanol<br>Phenol |
| Pellet coolers controlled via RCO                     | Propionaldehyde                    |

ii. Initial testing shall be conducted in accordance with Section 2.2 A.3.f.ii through vii above.

- d. **Periodic Performance Tests** – Under the provisions of North Carolina General Statute 143-215.108, the Permittee shall establish emission factors for HAPs by conducting performance test on the green hammermills (**ID Nos. ES-GHM-1 through ES-GHM-5**), the wood-fired direct heat drying systems (**ID No. ES-DRYER-1 and ES-DRYER-2**), the dry hammermills (**ID Nos. ES-HM-1 to ES-HM-8**), the dry shavings hammermills (**ID Nos. ES-DSHM-1 and ES-DSHM-2**), and the pellet coolers (**ID Nos. ES-CLR-1 through ES-CLR-6**). Periodic testing shall be conducted in accordance with the following:
- i. The pollutants and emission sources to be tested during the periodic performance tests are listed in the following table:

| <b>Emission Sources</b>                               | <b>Pollutant</b>                   |
|-------------------------------------------------------|------------------------------------|
| Green hammermills and dryer system controlled via RTO | Acetaldehyde<br>Acrolein           |
| Dry and dry shavings hammermills controlled via RCO   | Formaldehyde<br>Methanol<br>Phenol |
| Pellet coolers controlled via RCO                     | Propionaldehyde                    |

ii. Periodic testing shall be conducted in accordance with Section 2.2 A.3.f.ii through xiv above.

- e. **Monitoring/Recordkeeping/Reporting** [15A NCAC 02Q .0308(a)]  
Monitoring, recordkeeping, and reporting shall be performed in accordance with Section 2.2 A.3.g through u above.

***State-enforceable only***

5. **TOXIC AIR POLLUTANT EMISSIONS LIMITATION AND REQUIREMENT** - The following emission limitations and requirements in this section are enforceable until all of the requirements from Section 2.3 A., “Actions to be Taken by the Permittee”, have been met. Pursuant to 15A NCAC 02D .1100 and in accordance with the approved application for an air toxic compliance demonstration, the following permit limit shall not be exceeded.

| EMISSION SOURCE                     | TOXIC AIR POLLUTANTS     | EMISSION LIMITS                  |
|-------------------------------------|--------------------------|----------------------------------|
| Dryer system<br>(ID No. ES-DRYER-1) | Acrolein<br>Formaldehyde | 2.93 lb/hr<br>6.65 lb/hr         |
| Hammermill Filter #1                | Acrolein<br>Formaldehyde | 0.177 lb/hr<br>0.299 lb/hr       |
| Hammermill Filter #2                | Acrolein<br>Formaldehyde | 0.177 lb/hr<br>0.299 lb/hr       |
| Hammermill Filter #3                | Acrolein<br>Formaldehyde | 0.118 lb/hr<br>0.199 lb/hr       |
| Pellet Cooler #1 Aspiration Stack   | Acrolein<br>Formaldehyde | 0.149 lb/hr<br>0.0945 lb/hr      |
| Pellet Cooler #2 Aspiration Stack   | Acrolein<br>Formaldehyde | 0.149 lb/hr<br>0.0945 lb/hr      |
| Pellet Cooler #3 Aspiration Stack   | Acrolein<br>Formaldehyde | 0.149 lb/hr<br>0.0945 lb/hr      |
| Pellet Cooler #4 Aspiration Stack   | Acrolein<br>Formaldehyde | 0.149 lb/hr<br>0.0945 lb/hr      |
| Pellet Cooler #5 Aspiration Stack   | Acrolein<br>Formaldehyde | 0.149 lb/hr<br>0.0945 lb/hr      |
| Pellet Cooler #6 Aspiration Stack   | Acrolein<br>Formaldehyde | 0.149 lb/hr<br>0.0945 lb/hr      |
| Emergency generator (ID No. IES-GN) | Acrolein<br>Formaldehyde | 2.27E-04 lb/hr<br>2.89E-03 lb/hr |
| Fire water pump (ID No. IES-FWP)    | Acrolein<br>Formaldehyde | 1.94E-04 lb/hr<br>2.48E-03 lb/hr |

a. No reporting is required.

***State-enforceable only***

6. **TOXIC AIR POLLUTANT EMISSIONS LIMITATION AND REQUIREMENT** - The following conditions in this section are enforceable after all of the requirements from Section 2.3 A., "Actions to be Taken by the Permittee", have been met. Pursuant to 15A NCAC 02D .1100 and in accordance with the approved application for an air toxic compliance demonstration, the following permit limit shall not be exceeded.

| TOXIC AIR POLLUTANTS (CAS NUMBER) | UNITS   | RTO1    | FBYP-1 and 2 EACH IDLE-MODE | FBYP1 Cold startup | RTO2    | FBYP2 Cold startup | RCO1    |
|-----------------------------------|---------|---------|-----------------------------|--------------------|---------|--------------------|---------|
| Acetaldehyde (75-07-0)            | lb/hour | 3.3E-01 | 4.2E-03                     | 2.2E-02            | 3.5E-01 | 2.2E-02            | 6.3E-02 |
| Acrolein (107-02-8)               | lb/hour | 2.6E-01 | 2.0E-02                     | 1.1E-01            | 2.3E-01 | 1.1E-01            | 7.9E-02 |
| Arsenic and compounds             | lb/year | 2.5+00  | 5.5E-02                     | 2.9E-02            | 2.6E+00 | 3.0E-02            | 3.4E-02 |
| Benzene (71-43-2)                 | lb/year | 3.6E+02 | --                          | --                 | 3.6E+02 | --                 | 1.2E+02 |
| Beryllium (7440-41-7)             | lb/year | 1.3E-01 | 2.8E-03                     | 1.4E-03            | 1.3E-01 | 1.5E-03            | 2.0E-03 |
| Cadmium (7440-43-9)               | lb/year | 7.6E-01 | 1.0E-02                     | 5.4E-03            | 7.7E-01 | 5.5E-03            | 1.9E-01 |

| <b>TOXIC AIR POLLUTANTS (CAS NUMBER)</b> | <b>UNITS</b>      | <b>RTO1</b>        | <b>FBYP-1 and 2 EACH IDLE-MODE</b> | <b>FBYP1 Cold startup</b> | <b>RTO2</b>        | <b>FBYP2 Cold startup</b> | <b>RCO1</b> |
|------------------------------------------|-------------------|--------------------|------------------------------------|---------------------------|--------------------|---------------------------|-------------|
| Chlorine (7782-50-5)                     | lb/hour<br>lb/day | 1.4E-01<br>3.3E+00 | 4.0E-03<br>9.5E-02                 | 2.1E-02<br>5.0E-01        | 1.4E-01<br>3.4E+00 | 2.1E-02<br>5.1E-01        | --          |
| Formaldehyde (50-00-0)                   | lb/hour           | 3.2E-01            | 2.2E-02                            | 1.2E-01                   | 3.4E-01            | 1.2E-01                   | 9.0E-02     |
| Hydrogen chloride (7647-01-0)            | lb/hour           | 3.3E-01            | 9.5E-02                            | 5.0E-01                   | 3.4E-01            | 5.1E-01                   | --          |
| Manganese & compounds                    | lb/day            | 4.9E-01            | 1.9E-01                            | 1.0E+00                   | 5.0E-01            | 1.0E+00                   | 1.8E-04     |
| Mercury, vapor (7439-97-6)               | lb/day            | 1.3E-03            | 4.2E-04                            | 2.2E-03                   | 1.3E-03            | 2.3E-03                   | 1.2E-04     |
| Nickel (7440-02-0)                       | lb/day            | 1.2E-02            | 4.0E-03                            | 2.1E-02                   | 1.2E-02            | 2.1E-02                   | 9.7E-04     |
| Phenol (108-95-2)                        | lb/hour           | 1.2E-01            | 2.6E-04                            | 1.3E-03                   | 1.2E-01            | 1.4E-03                   | 2.4E-02     |

| <b>TOXIC AIR POLLUTANTS (CAS NUMBER)</b> | <b>UNITS</b>      | <b>RCO2</b> | <b>DWH 1 and 2 EACH</b> | <b>PVAP</b> | <b>DDB 1 through 4 EACH</b> | <b>GN1</b> | <b>FWP</b> | <b>GN2</b> |
|------------------------------------------|-------------------|-------------|-------------------------|-------------|-----------------------------|------------|------------|------------|
| Acetaldehyde (75-07-0)                   | lb/hour           | 1.8E-01     | --                      | --          | 1.5E-08                     | 1.9-E03    | 1.6-E03    | 1.2-E04    |
| Acrolein (107-02-8)                      | lb/hour           | 3.6E-01     | --                      | --          | 1.8E-08                     | 2.3E-04    | 1.9E-04    | 3.7E-05    |
| Arsenic and compounds                    | lb/year           | 3.4E-02     | --                      | --          | 1.7E-03                     | --         | --         | --         |
| Benzene (71-43-2)                        | lb/year           | 1.2E+02     | --                      | 6.2E+00     | 6.2E+00                     | 1.1E+00    | 9.8E-01    | 1.8+00     |
| Beryllium (7440-41-7)                    | lb/year           | 2.0E-03     | --                      | --          | 1.0E-04                     | --         | --         | --         |
| Cadmium (7440-43-9)                      | lb/year           | 1.9E-01     | --                      | --          | 9.4E-03                     | --         | --         | --         |
| Chlorine (7782-50-5)                     | lb/hour<br>lb/day | --          | --                      | --          | --                          | --         | --         | --         |
| Formaldehyde (50-00-0)                   | lb/hour           | 7.4E-02     | 6.5E-02                 | 1.5E-03     | 1.5E-03                     | 2.9E-03    | 2.5E-03    | 3.7E-04    |
| Hydrogen chloride (7647-01-0)            | lb/hour           | --          | --                      | --          | --                          | --         | --         | --         |
| Manganese & compounds                    | lb/day            | 1.8E-04     | --                      | --          | 8.9E-06                     | --         | --         | --         |
| Mercury, vapor (7439-97-6)               | lb/day            | 1.2E-04     | --                      | --          | 6.1E-07                     | --         | --         | --         |
| Nickel (7440-02-0)                       | lb/day            | 9.7E-04     | --                      | --          | 4.9E-05                     | --         | --         | --         |
| Phenol (108-95-2)                        | lb/hour           | 1.8E-01     | --                      | --          | --                          | --         | --         | --         |

a. No reporting is required.

- b. The Permittee has submitted a toxic air pollutant dispersion modeling analysis dated May 23, 2019 for the facility's toxic air pollutant emissions as listed in the above table. The modeling analysis was reviewed and approved by the AQAB on June 3, 2019. Placement of the emission sources, configuration of the emission points, and operation of the sources shall be in accordance with the submitted dispersion modeling analysis and should reflect any changes from the original analysis submittal as outlined in the AQAB review memo.

**State-enforceable only**

7. **TOXIC AIR POLLUTANT EMISSION RATES REQUIRING A PERMIT** – Pursuant to 15A NCAC 02Q .0711, a permit to emit toxic air pollutants is required for any facility whose actual rate of emissions from all sources are greater than any one of the following rates:

| <b>Pollutant (CAS Number)</b>               | <b>Carcinogens<br/>(lb/yr)</b> | <b>Chronic Toxicants<br/>(lb/day)</b> | <b>Acute Systemic<br/>Toxicants (lb/hr)</b> | <b>Acute Irritants<br/>(lb/hr)</b> |
|---------------------------------------------|--------------------------------|---------------------------------------|---------------------------------------------|------------------------------------|
| 1,3-Butadiene (106-99-0)                    | 11                             |                                       |                                             |                                    |
| Ammonia (7664-41-7)                         |                                |                                       |                                             | 0.68                               |
| Benzo(a)pyrene (50-32-8)                    | 2.2                            |                                       |                                             |                                    |
| Carbon tetrachloride<br>(56-23-5)           | 460                            |                                       |                                             |                                    |
| Chlorobenzene (108-90-7)                    |                                | 46                                    |                                             |                                    |
| Chloroform (67-66-3)                        | 290                            |                                       |                                             |                                    |
| Di(2-ethylhexyl)phthalate<br>(117-81-7)     |                                | 0.63                                  |                                             |                                    |
| Ethylene dichloride<br>(107-06-2)           | 260                            |                                       |                                             |                                    |
| Hexachlorodibenzo-p-<br>dioxin (57653-85-7) | 0.0051                         |                                       |                                             |                                    |
| Methyl chloroform<br>(71-55-6)              |                                | 250                                   |                                             |                                    |
| Methyl ethyl ketone<br>(78-93-3)            |                                | 78                                    |                                             |                                    |
| Methyl isobutyl ketone<br>(108-10-1)        |                                | 52                                    |                                             | 7.6                                |
| Methylene chloride<br>(75-09-2)             | 1600                           |                                       | 0.39                                        |                                    |
| Pentachlorophenol<br>(87-86-5)              |                                | 0.063                                 | 0.0064                                      |                                    |
| Perchloroethylene<br>(127-18-4)             | 13000                          |                                       |                                             |                                    |
| Polychlorinated biphenyls<br>(1336-36-3)    | 5.6                            |                                       |                                             |                                    |
| Styrene (100-42-5)                          |                                |                                       | 2.7                                         |                                    |
| Tetrachlorodibenzo-p-<br>dioxin (1746-01-6) | 0.00020                        |                                       |                                             |                                    |
| Trichloroethylene<br>(79-01-6)              | 4000                           |                                       |                                             |                                    |
| Toluene (108-88-3)                          |                                | 98                                    |                                             | 14.4                               |
| Trichlorofluoromethane<br>(75-01-4)         |                                |                                       | 140                                         |                                    |
| Vinyl chloride (75-01-4)                    | 26                             |                                       |                                             |                                    |
| Xylene (1330-20-7)                          |                                | 57                                    |                                             | 16.4                               |

**State-enforceable only**

**8. 15A NCAC 02D .1806: CONTROL AND PROHIBITION OF ODOROUS EMISSIONS**

The Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary.

**9. 15A NCAC 02Q .0207: ANNUAL EMISSIONS REPORTING**

The Permittee shall report by **June 30** of each year the actual emissions of each air pollutant listed in 15A NCAC 02Q .0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form as may be established by the Director. The accuracy of the report shall be certified by the responsible official of the facility.

**10. 15A NCAC 02Q .0304: APPLICATIONS**

The Permittee, at least 90 days prior to the expiration date of this permit, shall request permit renewal by letter in accordance with 15A NCAC 02Q .0304(d) and (f). Pursuant to 15A NCAC 02Q .0203(i), no permit application fee is required for renewal of an existing air permit. The renewal request should be submitted to the Regional Supervisor, DAQ.

**11. 15A NCAC 02Q .0504: OPTION FOR OBTAINING CONSTRUCTION AND OPERATION PERMIT**

- a. Pursuant to 15A NCAC 02Q .0504, the Permittee filed its first time Title V Air Quality Permit Application (6600167.14B) on April 22, 2014.
- b. The Permittee shall amend the first time Title V Air Quality Permit Application (6600167.14B) within **90 days of the issuance of Permit No. 10203R06**.

## **2.3 Construction Schedule**

The new pollution control devices are subject to the construction schedule described below.

**A. Actions to be Taken by the Permittee** - The Permittee shall comply with the following construction schedule:

1. Within 6 months from permit issuance (10203R06), the Permittee shall purchase the new pollution control devices (**I.D. Nos. CD-RTO-1, CD-WS-1, CD-WS-2, CD-RCO-1, CD-RCO-2, CD-DWH-BF-1, CD-DWH-2, CD-DSR-BF, CD-DSS-BF, and CD-ADD-BF excluding Dryer Line 2 controls in the event Line 2 equipment is not installed**);
2. Within 12 months from permit issuance (10203R06), the Permittee shall begin installation of the new control devices (**I.D. Nos. CD-RTO-1, CD-WS-1, CD-WS-2, CD-RCO-1, CD-RCO-2, CD-DWH-BF-1, CD-DWH-2, CD-DSR-BF, CD-DSS-BF, and CD-ADD-BF excluding Dryer Line 2 controls in the event Line 2 equipment is not installed**); and
3. Within 24 months from permit issuance (10203R06), the Permittee shall complete installation of new control devices (**I.D. Nos. CD-RTO-1, CD-WS-1, CD-WS-2, CD-RCO-1, CD-RCO-2, CD-DWH-BF-1, CD-DWH-2, CD-DSR-BF, CD-DSS-BF, and CD-ADD-BF excluding Dryer Line 2 controls in the event Line 2 equipment is not installed**); and demonstrate final compliance with 15A NCAC 02D .0515, .0516, .0521, .0535, .0540, .0711, .1100, 15A NCAC 02Q .0317 for avoidance of 15A NCAC 02D .0530, and 15A NCAC 02Q .0317 for avoidance of 15A NCAC 02D .1111 MACT.

**B. Activity Reporting** - No later than 30 calendar days after any date identified for accomplishment of any activity listed above, the Permittee shall submit written notice of what action was taken to the DAQ. If the action dates above are not met, the notice shall include an explanation of why the action date was not met, remedial action(s) taken, and a statement identifying the extent to which subsequent dates or times for accomplishment of listed activities may be affected.

## **B. GENERAL CONDITIONS AND LIMITATIONS**

1. In accordance with G.S. 143-215.108(c)(1), TWO COPIES OF ALL DOCUMENTS, REPORTS, TEST DATA, MONITORING DATA, NOTIFICATIONS, REQUESTS FOR RENEWAL, AND ANY OTHER INFORMATION REQUIRED BY THIS PERMIT shall be submitted to the:

Regional Supervisor  
North Carolina Division of Air Quality  
Raleigh Regional Office  
3800 Barrett Drive  
Raleigh, NC 27609  
919-791-4200

For identification purposes, each submittal should include the facility name as listed on the permit, the facility identification number, and the permit number.

2. RECORDS RETENTION REQUIREMENT - In accordance with 15A NCAC 02D .0605, any records required by the conditions of this permit shall be kept on site and made available to DAQ personnel for inspection upon request. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. These records must be kept on site for a minimum of 2 years, unless another time period is otherwise specified.
3. ANNUAL FEE PAYMENT - Pursuant to 15A NCAC 02Q .0203(a), the Permittee shall pay the annual permit fee within 30 days of being billed by the DAQ. Failure to pay the fee in a timely manner will cause the DAQ to initiate action to revoke the permit.
4. EQUIPMENT RELOCATION - In accordance with 15A NCAC 02Q .0301, a new air permit shall be obtained by the Permittee prior to establishing, building, erecting, using, or operating the emission sources or air cleaning equipment at a site or location not specified in this permit.
5. REPORTING REQUIREMENT - In accordance with 15A NCAC 02Q .0309, any of the following that would result in previously unpermitted, new, or increased emissions must be reported to the Regional Supervisor, DAQ:
  - a. changes in the information submitted in the application regarding facility emissions;
  - b. changes that modify equipment or processes of existing permitted facilities; or
  - c. changes in the quantity or quality of materials processed.

If appropriate, modifications to the permit may then be made by the DAQ to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.

6. In accordance with 15A NCAC 02Q .0309, this permit is subject to revocation or modification by the DAQ upon a determination that information contained in the application or presented in the support thereof is incorrect, conditions under which this permit was granted have changed, or violations of conditions contained in this permit have occurred. In accordance with G.S. 143-215.108(c)(1), the facility shall be properly operated and maintained at all times in a manner that will effectuate an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air cleaning device(s) and appurtenances.

7. In accordance with G.S. 143-215.108(c)(1), this permit is nontransferable by the Permittee. Future owners and operators must obtain a new air permit from the DAQ.
8. In accordance with G.S. 143-215.108(c)(1), this issuance of this permit in no way absolves the Permittee of liability for any potential civil penalties which may be assessed for violations of State law which have occurred prior to the effective date of this permit.
9. In accordance with G.S. 143-215.108(c)(1), this permit does not relieve the Permittee of the responsibility of complying with all applicable requirements of any Federal, State, or Local water quality or land quality control authority.
10. In accordance with 15A NCAC 02D .0605, reports on the operation and maintenance of the facility shall be submitted by the Permittee to the Regional Supervisor, DAQ at such intervals and in such form and detail as may be required by the DAQ. Information required in such reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and preventive maintenance schedules.
11. A violation of any term or condition of this permit shall subject the Permittee to enforcement pursuant to G.S. 143-215.114A, 143-215.114B, and 143-215.114C, including assessment of civil and/or criminal penalties.
12. Pursuant to North Carolina General Statute 143-215.3(a)(2), no person shall refuse entry or access to any authorized representative of the DAQ who requests entry or access for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.
13. In accordance with G.S. 143-215.108(c)(1), this permit does not relieve the Permittee of the responsibility of complying with any applicable Federal, State, or Local requirements governing the handling, disposal, or incineration of hazardous, solid, or medical wastes, including the Resource Conservation and Recovery Act (RCRA) administered by the Division of Waste Management.
14. PERMIT RETENTION REQUIREMENT - In accordance with 15A NCAC 02Q .0110, the Permittee shall retain a current copy of the air permit at the site. The Permittee must make available to personnel of the DAQ, upon request, the current copy of the air permit for the site.
15. CLEAN AIR ACT SECTION 112(r) REQUIREMENTS - Pursuant to 15A NCAC 02D .2100 "Risk Management Program," if the Permittee is required to develop and register a risk management plan pursuant to Section 112(r) of the Federal Clean Air Act, then the Permittee is required to register this plan with the USEPA in accordance with 40 CFR Part 68.
16. PREVENTION OF ACCIDENTAL RELEASES - GENERAL DUTY - Pursuant to Title I Part A Section 112(r)(1) of the Clean Air Act "Hazardous Air Pollutants - Prevention of Accidental Releases - Purpose and General Duty," although a risk management plan may not be required, if the Permittee produces, processes, handles, or stores any amount of a listed hazardous substance, the Permittee has a general duty to take such steps as are necessary to prevent the accidental release of such substance and to minimize the consequences of any release. **This condition is federally-enforceable only.**
17. GENERAL EMISSIONS TESTING AND REPORTING REQUIREMENTS - If emissions testing is required by this permit, or the DAQ, or if the Permittee submits emissions testing to the DAQ in support of a permit application or to demonstrate compliance, the Permittee shall perform such testing in accordance with 15A NCAC 02D .2600 and follow all DAQ procedures including protocol approval, regional notification, report submittal, and test results approval. Additionally, in accordance with 15A



NCAC 02D .0605, the Permittee shall follow the procedures for obtaining any required audit sample and reporting those results.

Permit issued this the 30<sup>th</sup> of October, 2019.

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION



for William D. Willets, P.E., Chief, Permitting Section

Division of Air Quality, NCDEQ

By Authority of the Environmental Management Commission

Air Permit No. 10203R06



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
AIR AND WASTE

**SEP 26 2017**

Ms. Claudia Davis  
Western Region Air Quality Manager  
Oregon Department of Environmental Quality  
4026 Fairview Industrial Drive S.E.  
Salem, Oregon 97302-1142

Dear Ms. Davis:

This letter is in response to the Oregon Department of Environmental Quality's (ODEQ) letter dated June 29, 2017, regarding whether the proposed Jordan Cove liquefied natural gas (LNG) facility is a "fuel conversion plant" and/or a "petroleum storage and transfer plant with a total capacity more than 300,000 barrels" as these terms are used in provisions in the Clean Air Act (CAA) and the Environmental Protection Agency regulations that establish and govern the prevention of significant deterioration (PSD) permitting program. As explained below and based on the information ODEQ provided the EPA Region 10 in the letter, which included the applicability request as well as an attachment containing the facility's reasoning for it not being a fuel conversion plant, in our view, the proposed project should not be considered a fuel conversion plant as that term is used in the PSD permitting program provisions in CAA and the EPA regulations. Additionally, in our view, the proposed project should not be considered a petroleum storage and transfer facility as that term is used in the PSD permitting program provisions.

In part, CAA § 169(1) defines "major emitting facility" as "any of the following stationary sources of air pollutants which emit, or have the potential to emit, one hundred tons per year or more of any air pollutant from the following types of stationary sources: ... fuel conversion plants, ... petroleum storage and transfer facilities with a capacity exceeding three hundred thousand barrels, ..." There is no definition of the terms "fuel conversion plants" or "petroleum storage and transfer facilities" in the statute and the statute does not otherwise contain a description of such types of facilities or plants. When the EPA defined the term "major stationary source" in its PSD regulations, the EPA incorporated these source category terms from the statutory definition of "major emitting facility" without further defining them. Thus, in the absence of more specific direction in the CAA and the EPA regulations, the EPA (and air agencies with approved programs) have some discretion to determine what types of facilities should be included in the "fuel conversion plant" and "petroleum storage and transfer facility" source categories.

The EPA has exercised this discretion in several prior situations. With respect to "fuel conversion plants," the EPA's past guidance describes such facilities as those which accomplish a change in state of a fuel.<sup>1</sup> However, the examples of "fuel conversion plants" given in the guidance statements involve

---

<sup>1</sup> See Memorandum from Kent Berry, Director Policy Analysis Staff, U.S. EPA, to Asa B. Foster, Jr., Director, Air and Hazardous Materials Division, U.S. EPA Region IV, "Clarification of Sources Subject

more than a simple change in state of a given fuel. The Clarification Memo, the EPA's earliest guidance on defining the source category, offers coal gasification, coal liquefaction, and oil shale processing as examples, all of which irreversibly produce a new type of fuel as the end product. Clarification Memo at 1. Similarly, the fuel conversion process described in the Cleveland Electric Memo involved the "production of low heat value fuel gas" from municipal solid waste and the facility was said to meet the source category criteria by "producing a low heat value fuel gas." Cleveland Electric Memo at 2-3. Implicit in these examples are irreversible changes to an initial fuel and a distinct final product that has generally undergone both a change in state and other chemical or physical changes.

More recent the EPA guidance regarding fuel conversion plants has directly addressed LNG facilities. For example, in 2003, the EPA's Region 6 office concluded, in response to a request for assistance regarding two proposed off-shore gas delivery systems, that the process of vaporization of LNG to natural gas at the proposed facilities would not qualify the facilities as fuel conversion plants as that term is used in the PSD permitting program.<sup>2</sup> While these facilities were not deemed to be fuel conversion plants, Region 6 based the conclusion on the nature of the conversion from LNG to natural gas as its rationale, rather than the fact that the natural gas itself is not converted into another type of fuel and the change in state is a temporary change, solely conducted for transport purposes. In 2007, the EPA's Region 10 office provided the State of Alaska its view that the ConocoPhillips Kenai LNG Plant was a fuel conversion plant for purposes of the best available retrofit technology requirement of the CAA regional haze program.<sup>3</sup> Region 10 followed the approach in the 2003 determination and focused its analysis on the process by which natural gas becomes LNG and whether such a process was naturally occurring.

In similar fashion to the Kenai LNG Plant, the proposed Jordan Cove LNG project would receive natural gas by pipeline, purify the incoming gas, cool it to form LNG, and store and load the LNG into marine tankers for export. However, after further consideration of the EPA's guidance in a context other than the LNG facility and the legislative history described below, it is now our view that LNG plants at marine terminals that cool natural gas into LNG for the purpose of transporting natural gas should not be considered "fuel conversion plants" as that term is used in the statutory definition of "major emitting facility" and the definition of "major stationary source" in the EPA regulations. Both the 2003 Region 6 and 2007 Region 10 letters assumed that a simple change of state was sufficient and moved on to other factors without considering an implicit characteristic of the earlier the EPA guidance—whether the facility was irreversibly converting one fuel type to another.

After a closer examination of the EPA's historical approach, our view is that a change in state is a possible characteristic of a fuel conversion plant but not the sole characteristic – i.e., not everything that accomplishes a change in state is a fuel conversion plant. Where a change of state occurs only for

---

to Prevention of Significant Deterioration (PSD) Review" (Jan 20, 1976) (hereinafter Clarification Memo), available at: <https://www.epa.gov/sites/production/files/2015-07/documents/phosphat.pdf>; see also Memorandum from Edward J. Lillis, Chief-Permits Program Branch, the U.S. EPA, to George T. Czerniak, Chief Air Enforcement Branch, U.S. EPA Region V, "Applicability of Prevention of Significant Deterioration (PSD) and New Source Performance Standards (NSPS) to the Cleveland Electric, Incorporated, Plant in Willoughby, Ohio" (May 26, 1992) (hereinafter Cleveland Electric Memo), available at: <https://www.epa.gov/sites/production/files/2015-07/documents/clvlnel.pdf>.

<sup>2</sup> Letter from C.J. Sheehan, Office of Regional Counsel, EPA Region 6 to M. Cathey, Managing Director, El Paso Energy Bridge Gulf of Mexico (October 28, 2003).

<sup>3</sup> Mahbubul Islam, Manager, State and Tribal Air Programs Unit, the U.S. EPA Region 10, to Tom Turner, Alaska Department of Environmental Conservation (Nov. 14, 2007).


transportation needs, the fuel remains natural gas throughout the process, and the process is necessarily reversible. Notably, in the case of an LNG export facility the change of state must be subsequently reversed at another facility before the natural gas is used as a fuel.

This view also appears to be consistent with the history and development of the source category. The term "fuel conversion plant" first appeared in EPA's re-proposed PSD rules on August 27, 1974. 39 FR 31000. The re-proposal included the following statement in the preamble: "[t]he list of sources subject to review has been expanded to include three additional source types - fuel conversion plants (such as coal gasification and oil shale plants) ...." *Id.* at 31003. The re-proposed rule itself did not contain a definition of the term "fuel conversion plants." Congress, when incorporating this term into the 1977 CAA Amendments, based on the July 29, 1976 debate of S. 3219, appears to have relied on the draft study developed by the Research Corp. of New England for EPA for the purpose of developing New Source Performance Standards. *See* Cong. Research Serv., A Leg. History of the Clean Air Act Amends. of 1977, Vol. 6 (Comm. Print 1980) at 5192. In this report, coal gasification again appears to be the predominant example referenced for the fuel conversion plants category. *Id.* at 5192-5199. There is no mention of LNG plants, let alone as fuel conversion plants, in the legislative history of the 1977 CAA Amendments.

Your letter also inquired as to whether the Jordan Cove LNG project should be included in the PSD source category "petroleum storage and transfer plant with a total capacity of more than 300,000 barrels." In one prior statement, the EPA has viewed this source category to be limited to those sources falling within SIC 5171 Petroleum Bulk Stations and Terminals, which includes "establishments primarily engaged in the wholesale distribution of crude petroleum and petroleum products, including liquefied petroleum gas, from bulk liquid storage facilities petroleum products."<sup>4</sup> Within the regional haze program, the EPA has also stated that this category includes the storage and transfer of gasoline and other petroleum-derived liquids.<sup>5</sup> Natural gas, by definition, is neither "a petroleum product" nor a "petroleum-derived liquid." Thus, in our view LNG storage tanks at LNG plants like the Jordan Cove LNG project, should not be considered part of the petroleum storage and transfer plant source category as that term is used in the PSD provisions described above.

Since the EPA Region 10 is not presently reviewing or taking action on a specific permit application for Jordan Cove facility or any other LNG facility, this letter does not have any legal force or effect or represent a final agency action with respect to any specific facility. Rather, this letter merely provides the EPA's view on one element of the PSD permitting requirements that ODEQ may consider as it evaluates which permitting requirements are applicable to the proposed Jordan Cove LNG project. We hope this letter is helpful. Please feel free to contact Dave Bray at (208) 553-4253 or me at (208) 553-1783 if you have any additional questions.

Sincerely,

  
Donald Dossett, P.E., Manager  
Stationary Source Unit

---

<sup>4</sup> Pamela Blakeley, Chief, Air Permits Section, U.S. EPA Region 5, to Don Smith, Minnesota Pollution Control Agency (Nov. 6, 2003).

<sup>5</sup> Proposed Guideline for Best Available Retrofit Technology Determinations Under the Regional Haze Regulations, 66 FR 38118 (July 20, 2001).

# DIRTY DECEPTION:

*How the Wood Biomass Industry Skirts the Clean Air Act*



April 26, 2018

## ACKNOWLEDGEMENTS

This report was researched and written by Patrick Anderson and Keri Powell of Powell Environmental Law on behalf of Environmental Integrity Project. Rachel Weber of Dogwood Alliance provided edits and suggestions.

## THE ENVIRONMENTAL INTEGRITY PROJECT

The Environmental Integrity Project (<http://www.environmentalintegrity.org>) is a nonpartisan, nonprofit organization established in March of 2002 by former EPA enforcement attorneys to advocate for effective enforcement of environmental laws. EIP has three goals: 1) to provide objective analyses of how the failure to enforce or implement environmental laws increases pollution and affects public health; 2) to hold federal and state agencies, as well as individual corporations, accountable for failing to enforce or comply with environmental laws; and 3) to help local communities obtain the protection of environmental laws.

For questions about this report, please contact EIP Director of Communications Tom Pelton at (202) 888-2703 or [tpelton@environmentalintegrity.org](mailto:tpelton@environmentalintegrity.org).

## PHOTO CREDITS

Cover photo: Enviva Ahoskie wood pellet mill in North Carolina, courtesy of Dogwood Alliance.



# DIRTY DECEPTION:

## *How the Wood Biomass Industry Skirts the Clean Air Act*

### Executive Summary

Across the U.S. South, industrial-scale “wood pellet” facilities are converting trees into pellets and shipping them to Europe to be burned for electricity. The industry has grown almost 10-fold since 2009, converting millions of tons of trees into pellet fuel for power plants under the mistaken notion that this is carbon neutral and therefore good for the climate. In the midst of this fast growth, relatively little attention has been paid to the high levels of air pollution—such as soot and volatile organic compounds—generated by wood pellet manufacturing, pollution which can lead to a wide array of health and environmental problems. The Environmental Integrity Project (EIP) examined air permits and emissions information in federal and state records for 21 wood pellet mills in the U.S. that are exporting to Europe and found numerous schemes to skirt federal Clean Air Act regulations. EIP’s survey also revealed a troubling record of dangerous fires and explosions, which cause serious episodes of heightened air pollution. EIP focused particular attention on the 15 “new generation” mills constructed since 2008 specifically to supply the international demand for wood pellets. These mills operate on a much larger scale and emit substantially more air pollution than traditional pellet mills that supply a domestic heating market.

### Key Findings:

- In 2017, at least a third of the wood pellet plants (7 out of 21) violated their permit limits by releasing illegal amounts of pollution, while another four plants had faulty permits issued by state governments that failed to require pollution control equipment required by the federal Clean Air Act. Overall, more than half of the plants (11 out of 21) either failed to keep emissions below legal limits or failed to install required pollution controls.
- The 21 wood pellet mills exporting to Europe emit a total of 16,000 tons of health-threatening air pollutants per year, including more than 2,500 tons of particulate matter (soot), 3,200 tons of nitrogen oxides, 2,100 tons of carbon monoxide, and 7,000 tons of volatile organic compounds. These plants also emit 3.1 million tons of greenhouse gases annually.
- A factory northeast of Houston owned by German Pellets has emitted nearly ten times its permitted limits of volatile organic compound pollution since it began operation in 2013, releasing 580 tons per year. Rather than require the facility to comply with legal limits, Texas officials are proposing to simply raise the limits to let the facility continue to emit dangerous levels of pollution.
- At the Enviva Biomass wood pellet plant in Southampton County, Virginia, plant operators actually removed the pollution control equipment to evade upgrade requirements and switched from processing softwood to hardwood, which results in more carbon dioxide pollution and other harmful environmental impacts.

- Of the 15 largest operating facilities, at least eight have had fires or explosions since 2014, including at factories in North Carolina, Georgia, Arkansas, Alabama, and Texas that released vast amounts of air pollution and/or injured employees. A blaze at the German Pellets storage silo in Port Arthur, Texas, burned for two months in 2017, releasing smoke that forced dozens of local residents to seek medical attention and killed a worker during cleanup.

One of the most troubling trends in the wood pellet industry is that facilities that should face the most rigorous air permitting standards are actually the least controlled and dirtiest. Under a Clean Air Act program called “new source review,” new or modified major sources of air pollution are required to reduce emissions to the level achievable by using the best available control technology. Contrary to that legal requirement, states allow construction of the country’s largest wood pellet manufacturing plants without controls, or with inadequate controls, for volatile organic compounds (VOCs), an air pollutant that causes smog and respiratory problems. This is despite the fact that extremely effective VOC controls capable of reducing emissions by 90 to 95 percent are in widespread use at similar wood pellet manufacturing plants. These same controls are also very effective at reducing hazardous air pollutants, which can cause a variety of health effects including cancer. For instance, in North Carolina, wood dryers at two recently permitted major source facilities owned by Enviva Biomass emit nearly six times more VOCs and 50 to 60 times more hazardous air pollutants than comparable facilities with appropriate pollution control systems.

In other instances, states allow facilities to emit well beyond legal limits for years at a time. In Mississippi, Florida, and North Carolina, state permitting authorities continue to allow wood pellet manufacturing plants to emit well above a 250 ton per year threshold for major sources without installing legally required air pollution controls. For example, the Drax plant in Amite County, Mississippi, near McComb, emits more than 900 tons per year of VOCs – more than three times the amount that normally triggers a requirement for the installation of best available pollution control equipment. An Enviva plant in Jackson County, Florida, north of Panama City, emits more than 500 tons per year, and an Enviva plant in Northampton County, North Carolina near Roanoke Rapids emits 377 tons per year. In each of these cases, the Clean Air Act mandates that state permitting authorities require the facility to either reduce its VOC emissions to below 250 tons per year or undergo major source permitting and install the best available control technology. But these states have largely failed to follow the law.<sup>1</sup>

Finally, in addition to the air pollution emitted during the manufacturing process directly, pellet mills and storage facilities have experienced a rash of fires and explosions, injuring workers and releasing large amounts of uncontrolled air pollution. Because wood pellets are stored in massive and concentrated piles, these fires can burn for days or weeks. In fact, in the summer of 2017, a fire at a German Pellets in storage facility in Port Arthur, Texas, burned for 52 days, emitting vast amounts of air pollution and sickening nearby residents.

This report calls on state permitting authorities to take these pollution problems seriously and require full compliance with the federal Clean Air Act. In particular, EIP requests that states take the following steps to ensure wood pellet facilities operate legally:



1. **Reexamine existing air permits in light of new testing that shows much higher emissions of volatile organic compounds and hazardous air pollutants.** If a facility is polluting above legal limits, states must take immediate action to ensure facilities cease violating pollution limits, either by accepting enforceable production limits or by installing adequate pollution controls.
2. **Require major sources of air pollution to install the best available control technology.** Many pellet mills with major source permits evade using the best available control technology, or any control technology at all, while facilities with minor source permits, often the same size or larger, do use controls. States must not reward companies for refusing to install controls that would reduce emissions to minor levels. Rather, states must require new or modified major sources utilize controls that are at least as effective as those used by the best-controlled minor sources.
3. **Institute pellet production limits at facilities that claim to be too minor for the best available pollution controls.** If pollution controls will not keep emissions below legal limits when a facility is operated at full capacity, the facility's permit must restrict maximum production to a level that ensures the facility will not exceed the major source threshold. Although a few permits EIP surveyed do incorporate production limits, most minor source permits do not and are therefore legally deficient.
4. **Ensure Communities are Notified of and Able to Participate in Permitting Decisions.** Many of the air permits EIP surveyed were issued without any public notice or the ability to comment, including permits for the initial construction of facilities, in contravention of the Clean Air Act. This means communities were not informed of the decision to allow sources of air pollution to locate in their backyard. States should revise their regulations and procedures to include public notice and opportunity for meaningful input from those closest to proposed facilities.
5. **Require annual emissions testing for volatile organic compounds and hazardous air pollutants from all of the major emission points at pellet mills.** Many permits rely on emissions estimates—frequently outdated and inaccurate—rather than source-specific emissions testing to determine the level of emissions. While continuous emissions monitoring is the best method to determine actual levels of pollution emitted, where states do not require this they must at least require annual testing of each of the major units at pellet mills for volatile organic compounds and hazardous air pollutants.
6. **Reduce the risk of fires and explosions by requiring facilities to comply with their general duty under the Clean Air Act to design and maintain a safe facility.** Fires and explosions from wood dust plague the industry, and states should utilize a section of the Clean Air Act, called the “general duty clause,” to develop site-specific management plans that will lower the risk of dangerous fires and explosions.

# Introduction

The wood pellet manufacturing industry exploded in the U.S. South beginning in the late 2000s, when the European Union began subsidizing burning wood for electricity under the false presumption that doing so would be carbon neutral. Under a loophole in the EU carbon accounting system, neither the loss of carbon-absorbing trees in U.S. South, nor the emissions from burning trees in EU are accounted for in assessing greenhouse gas emissions from wood biomass. Many climate scientists have refuted the EU's premise that cutting whole trees to burn for electricity is carbon neutral, especially in a time scale relevant to fighting the worst impacts of climate change. While the industry frequently claims to process mostly forest residuals, multiple investigations have shown this to be false.<sup>2</sup> Ecologists have also pointed out that the industry is having a major impact on forests in the South, especially ecologically valuable hardwood forests which are being cut and replanted with faster-growing softwood plantations to feed expected demand.

Although the EU has provided substantial subsidies to enable the growth of the wood pellet industry, narrow profit margins have caused European power plants to look beyond the EU for cheap sources of wood. The U.S. South, with its vast forests growing on mostly unprotected private lands, along with state and local governments eager to provide their own industry subsidies, provide the EU plants with just such a source. In the span of only a few years, the U.S. South became the world's largest wood pellet supplier. At present, EU power companies import over 4.7 million metric tons of U.S. wood pellets each year, up from just 500,000 tons in 2009 – a nearly tenfold growth over a decade.<sup>3</sup> Projections show this growth rate continuing, and possibly accelerating if Asian nations begin importing comparable amounts of wood pellets, as many in the industry predict.<sup>4</sup>

As the industry has grown, so too have concerns over just how clean and sustainable it is to burn trees for electricity. Recent reports document the wood bioenergy industry's adverse impacts on southern forests as well as its role in causing global climate change.<sup>5</sup> This report is the first to focus on air pollution generated by wood pellet manufacturing plants and the industry's unlawful evasion of air pollution control requirements intended to protect human health and the environment in the communities where these plants are located.

To ascertain the local and regional impacts of air pollution from wood pellet plants, EIP analyzed air permits, emissions information, and other documents related to the 21 plants exporting wood pellets, as well as 10 facilities under construction or proposed which have air permits. EIP also estimated emissions from nine proposed facilities which do not yet have air permits. This survey placed particular attention on the 15 new-generation mills built specifically to supply the international biomass demand, all of which have production rates above 300,000 tons per year, and all but one of which were built after 2010. The vast majority of pellets produced at these plants are exported to Europe, while a limited but growing portion is exported to Japan and other Asian nations.

EIP's survey reveals that these facilities emit dangerous amounts of air pollution, and further finds that state agencies consistently fall well short of their duty to ensure that these facilities control their pollution to the levels required by law, frequently due to misleading information supplied by the industry. As a result, many large pellet mills have been allowed

to emit air pollution, especially volatile organic compounds (VOCs) and hazardous air pollutants at levels well above legal limits for years at a time. When states do address these issues, they frequently fail to require actual compliance with Clean Air Act requirements. For instance, those states that have issued major new source review permits to large wood pellet plants concluded that the “best available control technology” for reducing VOCs is no controls, despite the fact that controls are in use at similar (and sometimes nearly identical) facilities. EIP’s findings are particularly concerning when viewed in conjunction with another recent report showing that wood pellet mills are substantially more likely to be located in communities living below the median income level and with large minority populations, communities frequently burdened with excess pollution from multiple industrial sources.<sup>6</sup> This report provides a state-by-state analysis of the state failures and industry deceptions that riddle this emerging industry. Additionally, this report details the lengthy history of fires and explosions at pellet mills, which emit dangerous levels of air pollution.

## How Pellet Mills Pollute

Before 2010, typical U.S. wood pellet mills were relatively small, producing between 10,000 and 100,000 tons of pellets per year for domestic consumption in home heating stoves. While these mills still had the potential to emit considerable amounts of air pollution, especially particulate matter, they weren’t generally large enough to trigger significant attention from permitting agencies or watchdog groups. The newer generation of mills built to feed Europe’s demand, on the other hand, are massive, producing up to 800,000 tons of wood pellets per year. While the large increase in scale came with an equally large increase in pollution, the full magnitude of emissions has not been well understood by permitting authorities. Consequently, states issued construction permits to many recent facilities under the assumption they would emit relatively low levels of air pollution (making them “minor” air pollution sources that are exempt from many control requirements), only to subsequently find that these facilities actually emit five or six times more pollution than legally allowed (making them “major” air pollution sources that should be subject to much more stringent pollution control requirements).

To understand the air pollution issues in the wood pellet industry, it is useful to understand the basics of how the facilities operate. A wood pellet manufacturing plant has two main tasks: to dry the wood to a point where it is efficient to burn in power plants, and to turn the wood into pellets for easy transport. To begin the process, wood arrives by truck (frequently whole trees from clear-cutting operations), often a half-dozen or more trucks per hour.<sup>7</sup> Once at the facility, the trees are debarked and then chipped in shredding machines called hammermills. The wood is then conveyed to the dryer, usually a large rotary dryer heated by burning wood and bark, where the moisture in the wood is reduced from about 50% by weight to around 10%. After the dryer, the wood is again processed by hammermills to reduce its size to a point where it can be formed into pellets. The next unit is the pellet press, which presses the wood through holes in a die to create pellets, a process that requires large amounts of pressure and heat. The pellets are then deposited into a pellet cooler to reduce their temperature back to safe levels. A typical facility produces between 50 and 70 tons of wood pellets per hour, or between 450,000 and 650,000 tons per year. The pellets are then

ready for transport to a port, where they are usually stored for some time before being shipped to Europe.

Each step in the process has the potential to emit large amounts of air pollution. The most obvious source is the drying process, as burning wood emits substantial amounts of fine particulate matter, carbon monoxide, nitrogen oxides, and greenhouse gases. While each of these pollutants has serious health or environmental impacts, fine particulate matter (PM<sub>2.5</sub>) is particularly harmful to human health. PM<sub>2.5</sub> consists of airborne particles less than 2.5 micrometers which can pass deep into a person's lungs and even into the bloodstream, causing heart attacks, decreased lung function, worsening asthma symptoms, and premature death. Recent research published in the *New England Journal of Medicine* found that reducing PM<sub>2.5</sub> by just 1 microgram per cubic meter throughout the United States could save 12,000 lives each year.<sup>8</sup> Many wood pellet mills frequently emit 60 to 80 tons per year of PM<sub>2.5</sub>, even after installing controls.<sup>9</sup>

In addition to the particulate matter emitted from burning wood, drying wood actually emits the largest share of air pollution. Green wood (that is, wood before it has been dried), contains significant amounts of volatile organic compounds (VOCs), and applying heat or mechanical energy to the wood releases the VOCs into the air. Once in the atmosphere, VOCs combine with sunlight to produce ground-level ozone, a major constituent of smog. Breathing ozone can trigger a variety of health problems, particularly for children, the elderly, and people of all ages who have lung diseases such as asthma. In addition to the ozone risk, VOC emissions from wood pellet mills also contain numerous individual pollutants which are classified by the EPA as hazardous air pollutants, such as acetaldehyde, formaldehyde, and methanol. Hazardous air pollutants are those pollutants which EPA has identified as especially toxic or carcinogenic even in small amounts and are the most tightly regulated pollutants under the Clean Air Act.

The industry and permitting agencies have long understood that drying wood emits large amounts of VOCs and hazardous air pollutants, in large part because the drying process at pellet plants is similar to the drying process in more traditional industries like particle board manufacturing. Because of this knowledge, even the earliest of the large wood pellet plants generally utilized control technology to reduce emissions from the dryers. The most common form of control is known as a regenerative thermal oxidizer, which uses very high temperatures to destroy 95 to 99 percent of the VOCs and organic hazardous air pollutants.

What the industry and permitting agencies did not understand at the outset is that units other than the dryer also emit substantial amounts of VOCs. Until recently, many permitting authorities simply assumed the hammermills, pellet presses, and pellet coolers did not emit any VOCs at all. That assumption began to fall apart in 2012, when a large facility, Georgia Biomass in Waycross, Georgia, decided to test all of the facility's units for VOC emissions. The results showed that not only did these units emit VOCs after all, they emitted a lot of them. Georgia Biomass found that their hammermills, pellet presses, and pellet coolers emitted more than 1,000 tons per year of VOCs, whereas the facility and the state previously believed the entire facility emitted less than 250 tons per year. This meant the facility had been operating in violation of its permit limits and the Clean Air Act's major source requirements for several years, leading Georgia to levy heavy fines and issue a

consent order requiring the facility to reduce its facility-wide VOC emissions to below 250 tons per year.

Testing at a Florida facility in 2013 and an Alabama facility in 2014 soon confirmed Georgia's findings. Both tests showed that the facilities had likewise been emitting VOCs well beyond legal limits. Unfortunately, though by 2014 three sets of testing showed that large pellet mills emitted substantially more VOCs than most permits allowed, most states have yet to take meaningful action to address the problem.

## Clean Air Act Permitting 101

In order to understand the systematic issues identified by EIP, this section provides a brief primer on the basic framework of Clean Air Act permitting and how it applies to the wood pellet industry (Appendix A contains a lengthier explanation). The basic scheme of Clean Air Act permitting is that facilities which either actually emit or have the potential to emit various pollutants above certain thresholds must apply for corresponding permits before beginning construction and/or operating, which contain certain requirements such as using pollution controls or limiting emissions. The key permits at issue in the wood pellet industry are “major source” permits and hazardous air pollutant permits. Major source permitting is a rigorous set of requirements meant to reduce emissions from the largest sources of air pollutants. For the wood pellet industry, facilities must go through major source permitting and install the best available control technology if they have the *potential* to emit more than 250 tons per year of any pollutant. Permitting for hazardous air pollutants, meanwhile, requires the use of the maximum achievable control technology, an even more stringent standard, for facilities which emit or have the potential to emit more than 10 tons per year of any hazardous pollutant, or more than 25 tons per year of all hazardous air pollutants. Note that both permitting requirements are triggered not only by actual emissions, but by potential emissions (which are usually the level of emissions when a facility operates at full capacity). Finally, one key thing to recognize is that these permitting programs are primarily administered by state environmental agencies, and while the federal EPA has some oversight, the vast majority of decision-making and enforcement occurs at the state level. This means permits and enforcement vary considerably from state to state.

## Part One: State-by-State Analysis of Permits Reveals a Troubling Pattern

After the initial revelations that wood pellet mills emit substantially more VOCs than initially believed, states reacted in many different ways. A few states took the violations seriously and required some facilities to install controls and/or reduce their pollution levels. This includes Georgia, where the VOC discovery was first made, and Alabama, which required the installation of a second pollution control system at a facility after it discovered the violation. Most other states failed to address the problem in an adequate manner. This section details those issues and other permitting deficiencies which have allowed the industry to pollute above legal limits for years.

## North Carolina

North Carolina is home to three wood pellet manufacturing plants owned by a company called Enviva Biomass in Sampson, Northampton, and Hertford Counties, and a fourth Enviva facility is under construction in Richmond County. The state has been the most egregious in terms of allowing unnecessary and unlawful pollution from the industry. While most wood pellet plants utilize at least some VOC and hazardous air pollutant controls, North Carolina illegally allows all three Enviva plants to operate without any VOC or hazardous air pollutant controls whatsoever and will do the same for the fourth when it begins operations. In fact, out of all of the large pellet mills in the country, only one other facility operates without VOC or hazardous air pollutant controls of any kind: the Enviva Southampton plant just across the border in southern Virginia, near Chesapeake. Due to North Carolina's lax oversight and Enviva's reluctance to install controls, the Enviva plants are the largest emitters of VOCs and hazardous air pollutants in the industry, emitting five to six times the level of VOCs and 50 times the level of hazardous air pollutants as comparable facilities.

**Table A. Annual Air Pollution from Exporting Pellet Mills in North Carolina (Tons)**

|                                         | Particulates | CO  | NOx | VOCs  | CO <sub>2</sub> |
|-----------------------------------------|--------------|-----|-----|-------|-----------------|
| Existing Plants (3)                     | 366          | 337 | 529 | 1,396 | 552,655         |
| Existing (3) and Under-Construction (1) | 511          | 568 | 749 | 2,024 | 782,483         |

### *Many North Carolina Plants Avoid Installing Best Available Control Technology*

Typically, industrial facilities seek to avoid the most stringent Clean Air Act control requirements by voluntarily limiting their air pollution levels that qualify them as “synthetic minor” sources (synthetic in the sense that they could be major sources but have limited themselves to minor source levels of emissions). Ironically, the current situation in the wood pellet manufacturing industry is that the “synthetic minor” air pollution sources usually utilize VOC controls while the “major” sources that are subject to more stringent control requirements do virtually nothing to control VOC pollution. Enviva's existing Sampson plant, located 35 miles east of Fayetteville, NC, and Enviva's proposed Hamlet plant (40 miles west of Fayetteville) are prime examples of this phenomenon. Enviva conceded at the outset that both plants qualified as “major” sources due to their VOC emissions.<sup>10</sup> Accordingly, major source permitting requirements applied to both plants, including the requirement to control air pollution to the level that can be achieved using “best available control technology.” The decision of what constitutes the best available control technology for controlling VOC emissions should be straightforward: what is the best type of pollution control technology utilized at similar facilities? As discussed above, every other non-Enviva facility of similar size operates with a regenerative thermal oxidizer controlling the facility's dryer. Many also reduce VOC emissions from other units by using additional pollution controls. These controls can reduce VOC and hazardous air pollutant emissions by 95% or more.<sup>11</sup> Accordingly, North Carolina plainly should have selected these same controls as “best available control technology” for the Enviva Hamlet and Enviva Sampson plants. It



did not. Rather, North Carolina concluded that Enviva need not install any VOC controls whatsoever. The problem is clear when Enviva's plants are compared to similar facilities. For example, an older facility in Georgia, Georgia Biomass, actually produces more wood pellets than Enviva Sampson, yet the Georgia plant emits just 130 tons of VOC per year compared to Enviva Sampson's 628 tons per year. This is because Georgia Biomass utilizes VOC control technology, despite being a synthetic minor source, while Enviva Sampson, a major source that should use the best available control technology, uses no controls at all.

Neither Enviva nor North Carolina indicated it was infeasible to install the VOC controls—regenerative thermal oxidizers—on the Sampson and Hamlet plants.<sup>12</sup> Rather, Enviva argued that a regenerative thermal oxidizer would be cost prohibitive, despite the fact that every other comparable company in the industry is able to afford the technology at least for the wood drying operations.<sup>13</sup> Enviva further argued that adequate VOC reductions could be achieved at both facilities by restricting the wood processed to 25% hardwood and 75% softwood, rather than 100% softwood. This is because softwood emits more VOCs than hardwood.<sup>14</sup> While this reduction in softwood does result in a small reduction of VOCs, perhaps 20%, it pales in comparison to the reduction achievable by the use of regenerative thermal oxidizers, which reduce VOC and organic hazardous air pollutant emissions by at least 95%.<sup>15</sup> With the use of regenerative thermal oxidizers, Enviva would lower VOC emissions from 628 tons per year to less than 50 tons per year.

In addition to not being an effective control technology to reduce VOC and hazardous air pollutant emissions, processing hardwood presents other significant environmental impacts. The use of slow-growing hardwood forests as feedstock, forests which sequester more carbon than softwood pine forests, results in more carbon in the atmosphere, even decades after the wood pellets have been burned.<sup>16</sup> The harvesting of bottomland hardwood forests is also concerning because of the critical ecosystem services that will be lost if these wetland habitats are decimated. Wetland forests buffer communities from storms and floods, and remove nutrients and other pollutants from water to maintain the quality of streams, rivers, and estuaries.<sup>17</sup> Destruction of hardwood forests also depletes habitats of endangered and imperiled species.<sup>18</sup>

### *Violations of Air Pollution Regulations at Plants in Richmond and Sampson Counties Means Massive Emissions of Hazardous Air Pollutants.*

In addition to allowing dangerously high VOCs, North Carolina's failure to require Enviva to install control devices at Enviva Hamlet and Enviva Sampson also means these facilities emit hazardous air pollutants at more than twice the legal threshold. In fact, emissions testing at Enviva Sampson recently revealed the facility's dryer emits up to 50 times more hazardous air pollution than comparable facilities, simply because North Carolina has not required pollution controls at the facility, and Enviva has refused to install the controls voluntarily.

Manufacturing wood pellets emits significant levels of hazardous air pollutants, especially acetaldehyde, formaldehyde, and methanol. EPA lists acetaldehyde and formaldehyde as probable human carcinogens, and both cause additional short term respiratory problems and chronic symptoms occur from long term exposure.<sup>19</sup> The health risks of methanol emissions, meanwhile, include "a decrease in gestation time, an increase in the number of required

Caesarian-section births, and, in prenatally exposed children, instances of a severe wasting syndrome, concentration-related delay in sensorimotor development and lower performance on an infant intelligence test.”<sup>20</sup>

The Clean Air Act requires that major sources of hazardous air pollutants like Enviva Hamlet and Enviva Sampson utilize the maximum achievable control technology, which is meant to be even more stringent than the “best available control technology” standard for other pollutants. Unfortunately, North Carolina has not required any control technology at all to reduce hazardous air pollutants at Enviva Sampson and Enviva Hamlet. This is extremely problematic, as control technology which can massively reduce these hazardous air pollutant emissions is standard in the wood pellet industry.<sup>21</sup> The hazardous air pollutants emitted at wood pellet facilities are largely emitted from the burning and drying of wood, and because these hazardous air pollutants are also VOCs, control technologies that reduce VOCs also reduce these particular hazardous air pollutant emissions.<sup>22</sup> This means installing a regenerative thermal oxidizer on the dryers at Enviva Sampson and Enviva Hamlet would reduce hazardous air pollutant emissions by 95% or more. Every other non-Enviva facility that EIP surveyed has installed a regenerative thermal oxidizer on their dryer, vastly lowering their hazardous air pollutant emissions.

Without this technology, the Enviva plants emit 300 times more formaldehyde and 71 times more acetaldehyde than Hazlehurst Wood Pellets, a Georgia facility with a similar process rate but that uses a regenerative thermal oxidizer. The Enviva facilities’ hazardous air pollutant emissions are substantially higher even than Georgia Biomass, the largest pellet mill in the country, because Georgia Biomass has installed regenerative thermal oxidizers while the Enviva plants have not. Although testing for hazardous air pollutant emissions is unfortunately rather rare, Table B below compares the available testing at similar facilities to the Enviva Sampson and Enviva Hamlet plants.

**Table B. Enviva Sampson and Enviva Hamlet Emit Much More Hazardous Air Pollutants Than Comparable Facilities That Utilize Regenerative Thermal Oxidizers**

| Facility                                                             | State | Production Rate (tons per year) | Acetaldehyde Emissions (tons per year) | Formaldehyde Emissions (tons per year) | Methanol Emissions (tons per year) | Total HAP Emissions (tons per year) |
|----------------------------------------------------------------------|-------|---------------------------------|----------------------------------------|----------------------------------------|------------------------------------|-------------------------------------|
| Georgia Biomass                                                      | GA    | 826,000                         | 1.7                                    | 7.6                                    | 5.0                                | 15.4                                |
| Drax Amite                                                           | MS    | 578,000                         | No Data                                | 0.4                                    | No Data                            | No Data                             |
| Hazlehurst                                                           | GA    | 525,000                         | 0.16                                   | 0.08                                   | 0.87                               | 1.1                                 |
| Enviva Sampson/Enviva Hamlet <sup>A</sup> (Initial Test)             | NC    | 535,000                         | 19.9                                   | 23.7                                   | 13.4                               | 70.1                                |
| Enviva Sampson/Enviva Hamlet <sup>A</sup> (Second Test) <sup>B</sup> | NC    | 535,000                         | 11.4                                   | 24.4                                   | 8.14                               | 55.5                                |

A. Although Enviva Hamlet is not yet operating, it is very similar to the Sampson facility.

B. After the first round of testing showed the facility was exceeding its VOC limits, Enviva tweaked their dryer, which somewhat reduced VOC emissions and some HAP emissions. It is unclear whether Enviva will continue to operate in this manner, but even if they do, emissions are still much higher than other facilities.



If Enviva Sampson and Enviva Hamlet installed regenerative thermal oxidizers on their dryers, hazardous air pollutant emissions would be cut by at least 95%.<sup>23</sup> Total hazardous air pollutants would be reduced from 55.5 tons per year to just 2.7 tons per year, and formaldehyde emissions would be lowered from around 24 tons per year to 1.2 tons. Acetaldehyde and methanol would both be reduced to less than one ton per year.

### *Enviva's Illegal Scheme to Avoid Major Source Permitting in Northampton County*

North Carolina impermissibly removed limits intended to reduce VOCs from Enviva's mill in Northampton County, allowing the facility to emit 200 tons more VOCs than similar facilities. Like the other Enviva facilities, Enviva Northampton's VOC emissions are uncontrolled, despite the fact that it emits well over the 250 ton per year major source threshold that should require the use of the best available control technology. Initially, North Carolina allowed Enviva to construct without VOC controls based on Enviva's agreement to accept enforceable limits designed to ensure that the facility's emissions qualified as "minor" (and therefore exempt from control requirements).<sup>24</sup> Specifically, Enviva agreed to reduce VOC emissions by processing no more than 10% softwood and to not dry the wood to lower than 13% moisture content.<sup>25</sup> But only two years later, Enviva apparently decided those restrictions no longer fit within its business plan and asked North Carolina to remove them from the Northampton facility's air permit.<sup>26</sup> North Carolina obliged, but still did not require Enviva to comply with the permitting and pollution control requirements applicable to major air pollution sources.<sup>27</sup> The law is clear that North Carolina acted illegally: when a facility takes a limit to avoid stringent Clean Air Act requirements applicable to "major" sources, as Enviva Northampton did, any subsequent relaxation of that limit that allows the source to emit more than the major source threshold (here, 250 tons per year of VOCs) triggers the requirement to obtain a major source construction permit and install required pollution controls.<sup>28</sup> North Carolina disregarded that requirement and allowed Enviva to continue operating the Northampton plant without VOC controls. The facility now emits 377 tons per year of VOCs, and is authorized to emit up to 456 tons per year—despite being constructed as a "minor" air pollution source.<sup>29</sup>

Table C on the following page shows that Enviva Northampton is the largest wood pellet mill in the country that does not utilize VOC control technology. To further illustrate the high emissions, other facilities which process various rates of softwood are adjusted to operating at 30% softwood, the same rate the Enviva Northampton currently processes. Once this adjustment is made, it is clear that Enviva Northampton's VOC emissions are substantially higher than they could be if Enviva utilized a regenerative thermal oxidizer on their dryer. Further, had the facility gone through legitimate major source permitting, VOC emissions from the hammermills and pellet coolers would also be reduced because major source permitting's best available control technology requirement applies to each emission unit with significant emissions.

**Table C. VOC Controls on Dryers at Pellet Mills Above 300,000 Tons Per Year Production Rate; Enviva Northampton Highlighted**

| Facility                       | State | Production Rate      | VOC Controls On Dryer               | Softwood Content | Actual VOC Emissions (tons per year) | VOC Emissions at 30% Softwood <sup>A</sup> (tons per year) |
|--------------------------------|-------|----------------------|-------------------------------------|------------------|--------------------------------------|------------------------------------------------------------|
| Georgia Biomass                | GA    | 826,000              | Yes (RTO and RCO)                   | 100%             | 120                                  | 36                                                         |
| Enviva Cottdendale             | FL    | 821,000              | Yes (RTO)                           | 100%             | 517                                  | 155                                                        |
| Zilkha Monticello <sup>B</sup> | AR    | 661,000              | Yes (RTO)                           | 100%             | 249                                  | 74                                                         |
| Enviva Northampton             | NC    | 628,000              | No                                  | 30%              | 377                                  | 377                                                        |
| Drax Amite                     | MS    | 578,000              | Yes (RTO)                           | 100%             | 249 <sup>C</sup>                     | 63                                                         |
| German Pellets                 | TX    | 578,000              | Yes (RTO)                           | 100%             | 580                                  | 174                                                        |
| Enviva Southampton             | VA    | 535,000              | No                                  | 10%              | 245                                  | 321                                                        |
| Enviva Sampson                 | NC    | 535,000              | No                                  | 75%              | 628                                  | 251                                                        |
| Enviva Hamlet <sup>B</sup>     | NC    | 535,000              | No                                  | 75%              | 628                                  | 251                                                        |
| Colombo (Now Enviva Greenwood) | SC    | 175,000 <sup>D</sup> | Yes (RTO)                           | 100%             | 249 <sup>D</sup>                     | 74                                                         |
| Hazlehurst                     | GA    | 525,600              | Yes (Sent to burner, 90% reduction) | 100%             | 216                                  | 64                                                         |
| Highland Pellets               | AR    | 500,000              | Yes (Sent to burner, 90% reduction) | 100%             | 245                                  | 73                                                         |
| Drax Morehouse                 | LA    | 500,000              | Yes (RTO)                           | 98%              | 249 <sup>E</sup>                     | 76                                                         |
| Drax LaSalle                   | LA    | 500,000              | Yes (RTO)                           | 100%             | 611                                  | 183                                                        |
| Enviva Ahoskie                 | NC    | 420,000              | No                                  | 30%              | 280                                  | 280                                                        |
| Westervelt                     | AL    | 320,000              | Yes (Two RTOs)                      | 100%             | 28                                   | 8                                                          |
| Zilkha                         | AL    | 300,000              | Yes (RTO)                           | 50-100%          | 246                                  | 73                                                         |

A. Facilities utilize a range of softwood content, however, for comparison purposes, we assume in this column that all facilities are utilizing 30% softwood, which is what the Enviva Northampton plant currently utilizes.

B. Facility is permitted but not yet operating.

C. This facility's permit limit is 249 tons per year, but research by EIP shows it likely emits much higher levels, up 1,000 tons per year; see the section on Mississippi below.

D. Colombo Energy has the capacity to produce 669,000 tons per year, but without VOC controls on its post-dryer emissions, the facility must limit operations to avoid exceeding the 250 ton per year major source threshold. See the discussion on this facility below in the South Carolina section.

E. This facility's permit limit is 249 tons per year, but research by EIP shows it likely emits much higher levels, potentially more than 700 tons per year, see the section on Louisiana below.

### *Complete Lack of Public Input at Enviva's Northampton and Hamlet Plants When It Mattered.*

The most troubling aspect of Enviva Northampton's permitting history is that it was completely opaque; the public never had notice or the opportunity to comment on the facility's construction or subsequent modification to emit more than 250 tons per year of VOCs.<sup>30</sup> This is because North Carolina's regulations do not require public notice or

comment for minor source permits such as the one obtained by Enviva for Northampton, likely in contravention of the Clean Air Act.<sup>31</sup> This is in contrast to the major source permit process, for which North Carolina does require public notice and comment. In other words, residents who live near the Northampton facility—now emitting at major source levels—never knew about the levels of pollution emitted, or the decision to allow the facility to increase its emission above the major source threshold. Had the facility initially proposed to emit 377 tons per year of VOCs, the permits would have been subject to public notice and comment, but Enviva craftily avoided these requirements by taking initial limits and then eliminating those limits just two years later.

The public also lacked an adequate opportunity to provide input for the permit for Enviva Hamlet in Richmond County. As noted above, this permit allows the highest level of air pollution in the industry. In issuing this permit, the state failed to follow clear regulations which serve to inform the public about the proposed facility near the predominantly African American community of Dobbins Heights. North Carolina never held a public hearing on the permit, notwithstanding the Clean Air Act's clear mandate to do so and despite requests by the community.<sup>32</sup> North Carolina also issued public notice and draft permits for the facility with incorrect addresses, making it difficult for citizens to learn whether the facility would be built in their backyard or elsewhere.<sup>33</sup> While North Carolina dismisses these issues as minor typos, the failure to give the proper address meant that those who were most impacted could not reasonably discover the true location of the plant until after the opportunity to file comments or request a hearing.

## Texas

Texas only has one exporting pellet plant, German Pellets northeast of Houston, but the facility has had a serious history of failing to comply with the Clean Air Act, as well as the worst record of fires in the industry, with at least five fires or explosions since 2014. One fire at a German Pellet's storage facility in Port Arthur burned for more than 50 days, sickening residents and leading to multiple lawsuits.

**Table D. Annual Air Pollution from Exporting Pellet Mills in Texas (Tons)**

|                     | Particulates | CO | NOx | VOCs | CO <sub>2</sub> |
|---------------------|--------------|----|-----|------|-----------------|
| Existing plants (1) | 72           | 98 | 175 | 580  | 190,923         |

### *Pellet Plant in Woodville Has Violated Clean Air Law for Years, but Texas Proposes no New Controls*

The German Pellets facility in the community of Woodville, Texas, 90 miles northeast of Houston, has emitted VOCs at nearly double its permitted limits and the major source threshold since it began operation in 2013, with VOC emissions approaching 600 tons per year. Despite the testing at multiple facilities dating to 2012 that proved large facilities like German Pellets could not remain below the major source threshold without additional controls, German Pellets apparently did not discover that it was itself violating its permit

limit of 64 ton per year (as well as the 250 ton per year major source threshold) until late 2014. It turns out the facility actually emits 580 tons of VOCs per year.<sup>34</sup> Instead of punishing the facility for violating the terms of its permit and exceeding the Clean Air Act's major source threshold for nearly five years, Texas has allowed the facility to continue to operate at full capacity, emitting the same level of illegal VOC emissions. In fact, Texas is now proposing to issue a major source permit to the facility that simply raises the emissions limits to levels with which German Pellets can comply while requiring no additional VOC control measures.

While German Pellets does utilize a regenerative thermal oxidizer on its dryer, the hammermills and pelletizing lines are uncontrolled and emit substantial amounts of VOCs. The two pellet coolers emit 446 tons per year of VOCs, and the total post-dryer emissions are 514 tons per year. As discussed above, the major source permitting process must limit emissions to the level that can be achieved by using best available control technology. A regenerative thermal oxidizer or a regenerative catalytic oxidizer—controls which have been installed on hammermills and pelletizing units at several other facilities—should have been chosen as the best available control technology.

German Pellets submitted misleading information to the Texas permitting authority to justify not installing control technology. In particular, German Pellets dismissed from consideration all facilities which utilize control technology for the hammermills and pellet coolers on the grounds they were permitted as minor sources, and only submitted information on facilities that do not use controls.<sup>35</sup> German Pellets further stated that it was “consistent with other similar operations” not to install VOC controls on the post dryer units.<sup>36</sup> The fact of the matter is that many wood pellet mills do utilize these controls, as Table E below shows. The Clean Air Act's best available control technology mandate therefore requires the same level of controls at German Pellets, regardless of the type of permit in place at similar facilities (in fact a proper analysis must even evaluate international facilities if they achieve greater emission reductions).<sup>37</sup> Yet based on German Pellets' application, Texas authorities may not have even been aware that such controls were in use in the industry because the facility only submitted information on plants that do not use controls on their post-dryer units.

A regenerative thermal oxidizer, in use at several other facilities, would reduce the total post-dryer emissions from 514 tons per year to just 25 tons per year. Another alternative, in use at several facilities, is to route the post-dryer emissions to the dryer and its regenerative thermal oxidizer, a technique that achieves at least 95% VOC reduction. These are not extreme options; as Table E below shows, most similar facilities (i.e. facilities processing mostly softwood) utilize some form of technological control to reduce VOCs. Yet Texas is proposing a permit which would not require any technological controls on the relevant units, despite the best available technology requirement.

**Table E. Despite German Pellets' Claim, Many Facilities Utilize Controls to Reduce Post-Dryer VOC Emissions**

| Post-Dryer Controls at Synthetic Minor Pellet Mills Processing More than 50% Softwood |       |                      |                  |              |                                  |                                               |                             |
|---------------------------------------------------------------------------------------|-------|----------------------|------------------|--------------|----------------------------------|-----------------------------------------------|-----------------------------|
| Facility Name                                                                         | State | Production Rate      | Softwood Content | Major Source | VOC Controls on Hammermills      | VOC Controls on Pellet Presses and/or Coolers | Facility-wide VOC Emissions |
| Georgia Biomass                                                                       | GA    | 826,000              | 100%             | No           | RTO (95% control)                | RTO (95% control)                             | 130                         |
| Enviva Cottondale                                                                     | FL    | 821,000              | 100%             | No           | Sent to Burner-RTO (95% control) | Sent to Burner-RTO (95% control)              | 517                         |
| Zilkha Monticello (proposed and permitted)                                            | AR    | 661,912              | 100%             | No           | Sent to Burner-RTO (95% control) | Sent to Burner-RTO (95% control)              | 249                         |
| Drax Amite                                                                            | MS    | 578,000              | 100%             | No           | None                             | None                                          | 900+ <sup>A</sup>           |
| Colombo Energy (Now Enviva Greenwood)                                                 | SC    | 168,000 <sup>B</sup> | 100%             | No           | Limited Operating Hours          | Limited Operating Hours                       | 249                         |
| Hazlehurst                                                                            | GA    | 525,600              | 100%             | No           | Sent to Burner-RTO (95% control) | Sent to Burner-RTO (95% control)              | 216                         |
| Highland Pellets                                                                      | AR    | 500,000              | 100%             | No           | Sent to Burner (90% control)     | Sent to burner (90% control)                  | 208                         |
| Highland Pellets South (proposed)                                                     | AR    | 500,000              | 100%             | No           | Sent to Burner (90% control)     | Sent to burner (90% control)                  | 208                         |
| Drax Morehouse                                                                        | LA    | 500,000              | 100%             | No           | None                             | None                                          | 465 <sup>C</sup>            |
| Bord na Mona (proposed and permitted)                                                 | GA    | 330,000              | 50-100%          | No           | Sent to Burner-RTO (95% control) | None                                          | 192                         |
| Westervelt                                                                            | AL    | 320,000              | 100%             | No           | RTO (95% Control)                | RTO (95% Control)                             | 139                         |
| Post-Dryer Controls at PSD Major Source Pellet Mills                                  |       |                      |                  |              |                                  |                                               |                             |
| German Pellets                                                                        | TX    | 578,000              | 100%             | Yes          | None                             | None                                          | 580                         |
| Enviva Sampson                                                                        | NC    | 535,000              | 75%              | Yes          | None                             | None                                          | 628                         |
| Enviva Hamlet (proposed and permitted)                                                | NC    | 535,000              | 75%              | Yes          | None                             | None                                          | 628                         |
| Drax LaSalle                                                                          | LA    | 500,000              | 100%             | Yes          | None                             | None                                          | 611                         |

A. This facility has never tested its post-dryer units; emissions based on Georgia Biomass emission factors. See the Mississippi section below.

B. Facility has the capacity to operate at up to 669,000 tons per year but is limiting operating hours to avoid exceeding permit limits.

C. This facility has never tested its pellet coolers. Pellet cooler emissions estimated based on average emission factor for pellet coolers derived from stack testing (see Louisiana section below). Actual emissions could be as high as 745 tons per year.

# Mississippi

Mississippi is home to three pellet mills exporting to Europe: two relatively small Enviva plants, Enviva Amory ear Tupelo and Enviva Wiggins near Gulfport (Enviva is in the process of selling the Wiggins plant), and one large facility in Amite County owned by Drax Biomass. Drax also owns and operates the Drax power plant in the UK, which is the largest consumer of wood pellets in the world, and the single largest emitter of CO<sub>2</sub> in the UK. The Drax power plant is almost exclusively supplied by pellet plants in the U.S. South, including Drax's own mills, Enviva's mills, and others. In addition to the existing mills, a fourth facility is proposed in the state, Enviva Lucedale, north of Biloxi.

**Table F. Annual Air Pollution from Exporting Pellet Mills in Mississippi (Tons)**

|                               | Particulates | CO  | NOx | VOCs  | CO <sub>2</sub> |
|-------------------------------|--------------|-----|-----|-------|-----------------|
| Existing Plants (3)           | 462          | 309 | 325 | 1,400 | 270,617         |
| Existing (3) and proposed (1) | 607          | 540 | 545 | 2,028 | 500,445         |

Note: Particulate, CO, and Nitrogen Oxide emissions from Enviva Wiggins and Amory estimated based on similar facilities as this data was not available. Emissions from the proposed Enviva Lucedale are the same as Enviva Sampson, Enviva's most recently-constructed plant.

## *Drax Plant in Gloster Misleads Mississippi on VOC Emissions*

Drax Biomass appeared to mislead Mississippi officials in order to avoid major source permitting requirements at its Drax Amite facility in Gloster. Drax submitted extremely low emissions estimates for certain units based on testing that Drax should have known was invalid. By doing so, Drax was able to convince Mississippi that the Amite facility's VOC emissions were below the 250 ton per year major source threshold, when more reliable testing data showed the facility's emissions were likely to be around 1,000 tons per year. Troublingly, Mississippi has never required that the facility conduct emissions testing on the relevant units, and instead has accepted Drax's estimates.

As with other large facilities initially permitted before 2013, Drax initially assumed that only Amite's dryer would emit VOCs. It took until 2016 for Drax to acknowledge that other units emit any VOCs at all.<sup>38</sup> Drax then asserted that these emissions were minor, and that emissions from these units would be just "0.704 lb/ton [pounds of VOCs per ton of wood pellet produced], based on testing performed at Green Circle Bio Energy with 10% additional margin included."<sup>39</sup> Drax did not provide the cited test data with its application, and supplied no further information on the test. It turns out that Drax was referring to 2010 tests performed at Green Circle Bio Energy in Florida.<sup>40</sup> Subsequent testing performed at that facility in 2013 showed that the 2010 tests were completely invalid, and that the Green Circle facility actually emitted more than 1,000 tons of VOCs per year.<sup>41</sup> The true emissions rate at Green Circle (now Enviva Cottondale) for all post-dryer units was 3.25 lb/ton, almost five times higher than the .704 lb/ton proposed by Drax.<sup>42</sup> Further, the 3.25 lb/ton rate is completely consistent with other wood pellet plant manufacturing plant tests such as the Georgia Biomass testing (showing 3 lb/ton).<sup>43</sup> This means Drax Amite's true facility-wide emissions are likely above 900 tons per year, vastly exceeding the major source threshold of 250 tons per year.



While it is hard to prove that Drax intentionally misled Mississippi, it is difficult to fathom that Drax, one of the most prominent companies in the industry, was not aware of the elevated VOC issue when it submitted its Title V permit application in August 2016, or likewise was unaware that Green Circle had conducted subsequent testing in 2013 disproving the 2010 tests. Regardless, it may have worked: Mississippi proposed to issue the operating permit without questioning the assumed .706 lb/ton emission rate Drax provided. Mississippi states that testing at Drax Amite showed a “large margin of compliance” with the 249 ton per year VOC limit.<sup>44</sup> The problem is that these tests only tested the facility’s dryer and not the other significant sources of VOCs like hammermills and pellet coolers. In other words, Mississippi is still apparently operating under the impression that post-dryer units do not emit any VOCs, a completely incorrect assumption given the numerous tests conducted in the industry since 2013.

Mississippi’s proposed permit continues to treat Drax Amite as a minor source, despite likely VOC emissions of nearly 1,000 tons per year, four times higher than the 250 ton-per-year major source threshold. Further, Mississippi did not even propose to require Drax to test the Amite facility’s post-dryer units, so Drax can continue avoiding major source control requirements with impunity. EIP and a coalition of other concerned public interest groups recently filed comments with Mississippi during the public comment period on the draft permit that raised the above concerns regarding VOC emissions. Mississippi is currently reviewing the comments.

### *Mississippi Allows Unlawful Hazardous Air Pollutant Emissions from Enviva Mills in Stone and Monroe Counties*

Enviva Wiggins in Stone County, north of Gulfport, and Enviva Amory in Monroe County southeast of Tupelo, are two relatively small pellet mills which Enviva purchased in 2010. Despite being smaller than Enviva’s newer mills, both facilities have troublingly high hazardous air pollutant emissions because, as with the other Enviva mills, Enviva does not utilize any hazardous air pollutant controls, in contravention of the Clean Air Act. As explained below, potential hazardous air pollutant emissions from each of these facilities easily exceeds the level that triggers major source maximum achievable control technology requirements under the Clean Air Act, yet both sources claim to be minor sources that are exempt from these requirements. A compounding problem is that Mississippi issued utterly deficient permits to the two facilities authorizing wood pellet production rates that clearly lead to hazardous air pollutant emissions in excess of the major source threshold.

At Enviva Wiggins, emissions testing revealed that the facility, when operating at the permitted production rate of 185,550 tons per year, emitted 31 tons per year of hazardous air pollutants, including 10.3 tons of methanol.<sup>45</sup> The rates meant the facility was exceeding the threshold that triggers maximum achievable control technology for hazardous air pollutant emissions. Rather than install these controls, the facility decided to lower its emissions by restricting production. Based on the testing, Enviva’s own consultant calculated that the facility would need to limit production to 140,000 tons per year to remain below the hazardous air pollutant limit, yet Mississippi inexplicably authorized wood pellet production of up to 165,000 tons per year, which only reduced total hazardous air pollutant emissions to 28 tons per year.<sup>46</sup> This means the facility is still a major source of hazardous air pollutants, but is not complying with the major source requirement to install

maximum achievable control technology. Notably, if the facility installed a regenerative thermal oxidizer, total emissions would be less than two tons per year.

The hazardous air pollutant situation at Enviva Amory is also troublesome. Emissions testing there purportedly showed that the facility's hazardous air pollutant emissions were either zero or essentially zero, which is simply not plausible given that it has no hazardous air pollutant controls and operates at similar rates to Enviva Wiggins.<sup>47</sup> The testing found no acetaldehyde at all and just .64 tons per year of formaldehyde. These rates are highly inconsistent with stack tests at similar facilities, which generally show that wood drying emits considerable amounts of formaldehyde and acetaldehyde.<sup>48</sup> Although Mississippi apparently accepted Enviva's Amory test results, North Carolina rejected them when Enviva offered them as justification for not installing hazardous air pollutant control devices at its North Carolina facilities.<sup>49</sup> North Carolina's Stationary Source Compliance Branch found that the consultant that performed the testing for both Enviva facilities had used incorrect values for several significant pollutants, including acetaldehyde and formaldehyde, meaning the testing for both facilities underrepresented the facilities' hazardous air pollutant emissions.<sup>50</sup>

### *Enviva Facility Near Tupelo is Violating Major Source Permitting Requirements and Avoiding the Use of Pollution Controls*

Enviva Amory, the Enviva facility southeast of Tupelo, also has major issues with its VOC emissions, with several past and continuing violations. Most concerning is that the facility is currently operating in violation of the Clean Air Act's major source requirements. Facilities that have the potential to emit 250 tons per year or more of pollutants like VOCs must go through major source permitting (which requires the use of the best available control technology) or take legally enforceable limits to ensure that actual emissions stay below the major source applicability threshold. As shown below, Enviva Amory has the potential to emit VOCs well above 250 tons per year but has neither obtained a major source permit nor agreed to an enforceable emissions limit that would enable it to avoid major source permitting. Further, the facility is operating without any VOC controls whatsoever, meaning it is not complying with major source permitting's best available control technology requirement.

When initially constructed, Enviva claimed that the Amory facility's VOC emissions would not only be below the 250 ton-per-year major source applicability threshold, but also below the 100 ton-per-year required to apply for a federal operating permit known as a Title V permit.<sup>51</sup> Accordingly, Enviva accepted a VOC emissions limit of 99 tons per year and a production limit of 99,000 tons of wood pellets per year to keep its actual emissions below the Title V threshold.<sup>52</sup> Subsequent emission testing at Enviva Amory in 2013 showed that VOC emissions were 185 tons per year when producing 99,000 tons per year of pellets, far exceeding its 99 tons-per-year permit limit and the Title V threshold.<sup>53</sup> In light of the test results, Enviva applied for a Title V operating permit, but when Mississippi issued the new permit, it altogether eliminated the limits on the facility's VOC emissions and production rate.<sup>54</sup> The new permit also does not limit the kind of wood the facility can process.<sup>55</sup> This is highly problematic, because the facility could easily emit more VOCs than the major source threshold of 250 tons even without increasing capacity beyond its current rate. Because softwood emits much higher levels of VOCs than hardwood, any increase in the softwood



processed in the mix increases VOCs. Troublingly, the testing did not report what ratio the facility processed during the testing. This is basic information that is almost always included in testing reports. For instance, the Enviva Wiggins test states that it was conducted at 60% softwood.<sup>56</sup> If the testing at Amory occurred when the facility was processing relatively low levels of softwood, which is likely based on the results compared to similar facilities, then the resulting rate of 185 tons per year would not be representative of what the facility is capable of emitting. Since the permit contains no limit on the amount of softwood processed, Enviva Amory can process whatever it wants, including 100% softwood like many other wood pellet plants. At 100% softwood, the facility would emit 562 tons per year of VOCs at the current production rate.<sup>57</sup> This means the facility is currently violating major source rules, which require compliance with major source permitting and best available control requirements based on a facility's *potential* to emit pollution. Enviva Wiggins clearly has the potential to emit above 250 tons per year of VOCs and its permit has zero limits preventing it from doing so.

To illustrate how easy it would be for the facility to have emissions above the 250 ton per year major source threshold—assuming that during testing the facility was processing the same rate of softwood as Enviva Wiggins, 60% softwood—then an increase to just 65% softwood would place the facility's actual emissions beyond 250 tons per year (this is in part because Enviva Amory's testing occurred at a production rate of 99,000 tons per year, but now operates at 121,000 tons per year).<sup>58</sup>

## Louisiana

Louisiana hosts two large pellet mills; both are currently owned by Drax Biomass. The Drax Morehouse facility is located about 30 miles north of Monroe, Louisiana, while Drax Lasalle is located 35 miles north of Alexandria.

**Table G. Annual Air Pollution from Exporting Pellet Mills in Louisiana (Tons)**

|                     | Particulates | CO  | NOx | VOCs | CO <sub>2</sub> |
|---------------------|--------------|-----|-----|------|-----------------|
| Existing Plants (2) | 223          | 271 | 590 | 911  | 367,810         |

### *Drax Plant North of Monroe, Louisiana Likely Exceeds Major Source Limits, Yet Louisiana has Never Required Testing*

Drax's plant in Morehouse County does not control VOC emissions from its post-dryer units, and likely emits well above the 250 ton per year major source threshold. Unfortunately, although Louisiana did require VOC emissions testing from the facility's dryers and hammermills, for reasons that are not clear the state did not require emissions testing on Drax Morehouse's pellet coolers. Pellet coolers can be massive sources of VOC emissions, with testing at several similar facilities finding VOC emissions above 400 tons per year.<sup>59</sup> Drax, however, claims the Morehouse facility's pellet coolers emit just 20 tons per year of VOCs based on their own in-house testing.<sup>60</sup> Such in-house testing is not subject to the rigorous regulations and review procedures meant to ensure testing is an accurate reflection of true emissions. For instance, unlike legitimate testing, Drax did not need to

comply with any EPA-approved methodology, did not need to submit data and records from the test for review, did not need to test at full capacity (in fact the testing occurred at 35% capacity, which is well below the 80% or 90% minimum required by most states), nor did Drax need to notify the state that they were conducting the testing in order to allow state oversight. Nonetheless, Louisiana accepted Drax's proposed emissions rate without even reviewing Drax's testing protocols or the actual test results.<sup>61</sup>

Without adequate testing, it is hard to believe that Drax's self-reported emission rate, which is 20 to 30 times lower than similar facilities, is trustworthy. Table H below shows how Drax's emission factor compares to similar facilities:

**Table H. Drax Morehouse's Self-Reported Emission Factor is an Extreme Outlier**

| Facility                                  | State | Facility Production Rate at the Time of Testing (tons per year) | Uncontrolled Pellet Cooler VOC Emissions (tons per year) | Uncontrolled Pellet Cooler VOC Emission Factor (lb/ton) | Comparison to Drax Morehouse's Self-Reported Emission factor of .065 lb/ton |
|-------------------------------------------|-------|-----------------------------------------------------------------|----------------------------------------------------------|---------------------------------------------------------|-----------------------------------------------------------------------------|
| Drax Morehouse "engineering testing data" | LA    | 578,000                                                         | 20                                                       | .065                                                    | -                                                                           |
| Enviva Amory                              | MS    | 99,000                                                          | 101                                                      | 2.04                                                    | 31 times higher                                                             |
| German Pellets                            | TX    | 578,000                                                         | 446                                                      | 1.54                                                    | 23 times higher                                                             |
| Enviva Cottondale                         | FL    | 610,000                                                         | 460                                                      | 1.5                                                     | 23 times higher                                                             |
| Georgia Biomass (with steam injection)    | GA    | 820,000                                                         | 533                                                      | 1.3                                                     | 20 times higher                                                             |
| Hazlehurst Wood Pellets                   | GA    | 525,000                                                         | 166                                                      | .62                                                     | 9.5 times higher                                                            |
|                                           |       |                                                                 | Average Emission Factor:                                 | 1.07                                                    | 16.4 times higher                                                           |

Sources: Stack testing reports from plants other than Drax; Drax's emission factor from permit applications.

The issue of Drax Morehouse's pellet cooler emissions is not trivial. At the emission factors Louisiana accepted from Drax, Louisiana states that the facility is currently emitting 249.21 tons per year.<sup>62</sup> This means even a minute error in the pellet cooler emission rate would push the facility above the 250 ton per year major source threshold. In fact, applying any of the above test-derived emission rates to Drax Morehouse's pellet cooler results in a facility-wide VOC emission rate of at least 300 tons per year, and could be as high as 745 tons per year. Applying the average mission factor from the table above places the facility's total VOC emissions at 465 tons per year.

Notably, if Drax Morehouse installed a regenerative thermal oxidizer or other VOC control technology to its post dryer units, whether to remain below the major source threshold or to comply with major source permitting's best available control technology mandate, Drax could reduce VOC emissions to less than 50 tons per year.<sup>63</sup>

## Virginia

One pellet plant, owned by Enviva, is currently operating in Virginia, and Enviva has proposed a second facility in the state. The existing facility, Enviva Southampton, is located about 40 miles west of Norfolk, and the proposed facility will be just outside of Danville.

**Table I. Annual Air Pollution from Exporting Pellet Mills in Virginia (Tons)**

|                                | Particulates | CO  | NO <sub>x</sub> | VOCs | CO <sub>2</sub> |
|--------------------------------|--------------|-----|-----------------|------|-----------------|
| Existing Plants (1)            | 88           | 56  | 163             | 245  | 160,535         |
| Existing (1) and Proposed (1)* | 223          | 287 | 383             | 873  | 390,363         |

\* Emissions from the proposed Enviva Danville facility assume the new plant will have the same emissions as Enviva Sampson, the most recently-constructed Enviva plant.

### *After Discovering They Were Violating Limits, Enviva Southampton Actually Removed Pollution Control Technology*

Enviva's Virginia facility, located in Southampton County, was originally permitted as a synthetic minor source processing 90% softwood in 2012.<sup>64</sup> Predictably, after the Georgia Biomass testing showed facilities like this could not comply with their synthetic minor limits without additional controls, Enviva found that the Southampton facility was indeed emitting well above 250 tons per year.<sup>65</sup> Rather than installing additional control technology or reduce production like other companies have done, Enviva actually *removed* their VOC and hazardous air pollutant control technology (a regenerative thermal oxidizer) and switched to processing hardwoods.<sup>66</sup> While this did allow Enviva Southampton to begin complying with the VOC limit, it is far from environmentally sound given the larger ecological footprint of harvesting hardwood trees. Furthermore—and of particular importance to nearby residents—the removal of the regenerative thermal oxidizer means Enviva Southampton is no longer controlling its hazardous air pollutant emissions in any way, and the facility almost certainly emits major levels of hazardous air pollutants, triggering the Clean Air Act's hazardous air pollutant requirements to install the maximum achievable control technology. Despite this, Virginia has not required any technology to reduce hazardous air pollutants. Worse yet, Virginia has not even required that Enviva test for hazardous air pollutants, so the true rates are impossible to know.

Rather than requiring emissions testing for hazardous air pollutants, a requirement found in almost every other state, Virginia has apparently relied on Enviva's in-house estimates of the total amount of hazardous air pollutants emitted by the facility, estimates which are based on unsupported assumptions.<sup>67</sup> Enviva assumes that the difference in emissions for each individual hazardous air pollutant is uniform between hardwood and softwood, such that decreasing the amount of softwood processed will uniformly reduce each hazardous air pollutant by an identical rate.<sup>68</sup> This is simply not true. Research and recent testing at other facilities indicates that drying hardwood actually emits certain hazardous air pollutants at higher levels than drying softwood.<sup>69</sup> At the very least, Enviva's assumption that reducing softwood content will reduce each hazardous air pollutant at the same rate is not scientifically sound. Instead, EIP estimated emissions of hazardous air pollutants

individually, based on how each pollutant is emitted at 100% softwood and at 50% softwood, because these are known emission rates available in EPA databases.<sup>70</sup> From there, EIP can make a reasonable extrapolation to 10% softwood (the rate the Enviva Southampton currently processes). For formaldehyde, this produced an emission rate of 16.2 tons per year from the dryer alone, well above the 10 tons per year threshold for utilizing maximum achievable control technology, and three times higher than Enviva's own estimate for its dryer emissions of 5.87 tons per year.<sup>71</sup> The increase in formaldehyde emissions also means the facility is exceeding the 25 ton per year threshold for total hazardous air pollutant emissions, at 31 tons per year.<sup>72</sup>

Further, applying actual test results from a Georgia pellet mill that processes a similar ratio of hardwood shows that Enviva Southampton is almost certainly exceeding both its permit limits and the Clean Air Act's maximum achievable control technology threshold.<sup>73</sup> Based on those tests, Enviva Southampton emits 21.2 tons per year of methanol and 16.5 tons of formaldehyde, and emissions of total hazardous air pollutants are at least 46 tons per year. These rates are substantially higher than the 10 ton per year threshold for individual hazardous air pollutants and 25 tons per year for total hazardous air pollutants, meaning the facility should be required to install maximum available control technology—a regenerative thermal oxidizer. Had Enviva retained the regenerative thermal oxidizer to control hazardous air pollutants, these emissions would be less than one ton per year of formaldehyde, and total hazardous air pollutant emissions would be less than three tons per year.

## Florida

Florida only has only one wood pellet plant exporting to Europe, Enviva Cottondale located near Panama City, but the plant is the second largest pellet mill in the nation, producing more than 800,000 tons of pellets per year. The facility has correspondingly high emissions of air pollutants, as detailed below. A second facility, Cornerstone Biomass, is proposed in Florida, which would be located between Tallahassee and Gainesville.

**Table J. Annual Air Pollution from Exporting Pellet Mills in Florida (Tons)**

|                                | Particulates | CO | NOx | VOCs | CO <sub>2</sub> |
|--------------------------------|--------------|----|-----|------|-----------------|
| Existing Plants (1)            | 411          | 22 | 245 | 517  | 229,336         |
| Existing (1) and proposed (1)* | 511          | 85 | 370 | 767  | 293,546         |

\* Emissions from the proposed Cornerstone Biomass facility estimated based on similar-sized facilities.

### *Enviva Plant Near Panama City Emits More than 500 Tons Per Year of VOCs Without a Required Permit or Sufficient Controls*

Enviva Cottondale, formerly Green Circle Bio Energy, was one of the first facilities to test and find higher than expected VOC emissions after learning of the original Georgia Biomass testing in 2013. As with Georgia Biomass, the facility-wide VOC emissions were well over 1,000 tons per year, violating that facility's 250 ton per year permit limit and exceeding the major source threshold. While Florida did require the facility to take some action to reduce

VOC emissions, the facility still emits more than 500 tons per year of VOCs because the facility's pellet coolers remain uncontrolled.<sup>74</sup>

Despite Florida's acknowledgement in 2013 that Enviva Cottondale emits VOCs at more than twice the major source threshold, Florida did not require the facility to go through major source permitting until EIP and a coalition of concerned public interest organizations submitted comments on the facility's permit renewal in August of 2017.<sup>75</sup> In 2013, Florida had excused the facility from complying with major source requirements, including the use of best available control technology, in part because the original owners acted in "good faith" when they originally represented that hammermills and pellet coolers do not emit VOCs.<sup>76</sup> While Green Circle, the owners at the time, may have indeed acted in good faith when they operated the facility prior to knowing about the VOC emissions, the Clean Air Act does not contain an exception for pollution emitted in good faith. While EIP is glad to see that Florida is now requiring the facility to go through major source permitting, it is imperative that Florida require the use of the best available control technology for the facility's pellet coolers. Major source permitting requires an analysis of the best available control technology for each unit which emits a significant amount of a pollutant, and the pellet coolers currently have no controls at all. Given that the similar-sized Georgia Biomass has been able to reduce facility-wide VOC emissions to 130 tons per year by installing a regenerative catalytic oxidizer that controls pellet cooler emissions, Florida must require Enviva to utilize this control technology, or other technology that is equally effective.

## South Carolina

South Carolina has two pellet plants which export to Europe, and up to four more are proposed in the state. The largest facility, Colombo Energy, is located just outside of Greenwood and has the capacity to produce 669,000 ton of pellets per year. The facility was built in 2016 by the Portuguese paper company Portucel Soporcel, but was acquired by Enviva Biomass in February of 2018. A smaller facility, Thunderbolt Biomass, is located in Allendale County. The four proposed plants include an Enviva plant in Laurens County and a Drax Biomass plant in Abbeville County, each with a production capacity of 550,000 tons per year.

**Table K. Annual Air Pollution from Exporting Pellet Mills in South Carolina (Tons)**

|                                | Particulates | CO  | NOx   | VOCs  | CO <sub>2</sub> |
|--------------------------------|--------------|-----|-------|-------|-----------------|
| Existing Plants (2)            | 94           | 244 | 243   | 786   | 218,347         |
| Existing (2) and Proposed (4)* | 665          | 876 | 1,094 | 2,742 | 984,822         |

\* Emissions from proposed plants based on recently constructed Drax and Enviva facilities.

### *Greenwood Facility Fails to Meet Testing Requirements, Fast-Tracks Inadequate Permit Behind Closed Doors*

In February 2018, Enviva Biomass acquired the Colombo wood pellet manufacturing facility in Greenwood, South Carolina, with plans to more than triple production. The plant is permitted as a synthetic minor source, meaning that it is exempt from the Clean Air Act's



requirement that it reduce air pollution using best available control technology. However, the Colombo plant discovered recently that it generates far more VOC emissions than it previously thought, and that it was capable of emitting more than 600 tons of VOCs per year. At that time, plant operators started limiting the plant's production to less than a third of its designed capacity to keep emissions to legal levels (the facility is designed to produce 669,000 tons per year, and Colombo has been operating at less than 200,000 tons per year). Now, Enviva has publicly stated that it wants to increase actual production to 660,000 tons per year, and to do that, the plant must install controls to reduce its VOC emissions.<sup>77</sup> While Enviva plans to install controls on some of the plant's VOC-emitting sources, it does not plan to install controls on its hammermills. As a result, the facility would still emit more than 300 tons per year of VOCs when operating at the capacity Enviva desires.<sup>78</sup> Based on its potential emissions, even with the new controls the plant plainly qualifies as a major source which must utilize the best available control technology on all of its sources. Instead, South Carolina issued a permit with no public notice or opportunity to comment which did not contain a production limit necessary to restrict the facility's emissions to legal levels.<sup>79</sup> In response to pressure from EIP and other groups, the facility agreed to amend their permit to include an enforceable production limit of 500,000 metric tons.

Another troubling issue with the Colombo facility is that it failed to conduct legally adequate emission testing, with one set of tests the facility submitted to South Carolina wildly inaccurate. After first failing to meet the permit deadline to submit testing within 180 days of start-up, Colombo eventually sent South Carolina test results that anyone familiar with emissions from wood pellet manufacturing plants could tell were wildly inaccurate. That testing underrepresented VOC emissions from the facility's pellet coolers by at least 259 tons per year, conveniently showing that the facility could operate at full production rates without exceeding the major source threshold.<sup>80</sup> Eventually, even Colombo acknowledged these tests were flawed, and arranged for a different consultant to perform a new round of testing in October 2017. The new testing showed significantly higher VOC emissions from the facility's pellet coolers: 370 tons per year compared to the original test's result of 111 tons per year.<sup>81</sup> However, this subsequent testing also failed to fulfill Colombo's testing obligation because Colombo did not follow proper procedures regarding planning and notification. Colombo's permit and South Carolina regulations set out numerous requirements for emission testing, including prior approval of a site-specific test plan and notification to South Carolina officials of the test date. Notification of the test date is crucial, because it allows South Carolina officials the ability to observe the testing. Despite these legal requirements, Colombo conducted its tests without notifying South Carolina and without an approved site-specific test plan.<sup>82</sup> This means the tests were conducted without approval and without any outside observers. While the facility may conduct proper testing in the future, the fact remains that South Carolina has allowed the facility to operate for 18 months without satisfying its requirement to conduct legitimate emissions testing.

## Georgia

Georgia is home to five pellet mills exporting to Europe, and four more proposed facilities have either received permits or are under construction. The two largest mills, Georgia Biomass in Waycross, and Hazlehurst Wood Pellets in Jeff Davis County, produce more

than 1.3 million tons of wood pellets per year. While Georgia was the first state to recognize the VOC issue from pellet mills and has generally done the best of any state to address the issue, permits in the state still allow for facilities to emit more VOCs and hazardous air pollutants than the Clean Air Act allows without installing pollution controls.

**Table L. Annual Air Pollution from Exporting Pellet Mills in Georgia (Tons)**

|                                | Particulates | CO    | NO <sub>x</sub> | VOCs  | CO <sub>2</sub> |
|--------------------------------|--------------|-------|-----------------|-------|-----------------|
| Existing Plants (5)            | 499          | 510   | 584             | 999   | 649,836         |
| Existing (5) and Proposed (4)* | 1,138        | 1,259 | 1,357           | 1,932 | 1,233,545       |

\* Emissions from proposed plants based on permitting materials and similar facilities.

### *Georgia Permits Lack Enforceable Pollution Limits.*

Permits for at least two facilities, Appling County Wood Pellets near Brunswick and Varn Wood Pellets near Waycross, fail to require best available control technology, or alternatively, fail to adequately limit emissions. At Appling County Pellets, which does not utilize any pollution controls for VOCs, the permit lacks any facility-wide VOC limit. While the latest draft permit does contain a production limit, which is a step in the right direction, the production limit fails to ensure the facility will not emit more than 250 tons per year of VOCs. This is because the facility could exceed 250 tons per year of VOCs even while producing less than the production limit. Georgia relied on emission factors—rates of pollution emitted per ton of product produced—to show that the production limit contained in the permit would keep emissions below 250 tons per year. The problem is, those emission factors are based on stack testing which does not adequately represent the maximum emissions. The facility processed mostly hardwood during the testing, but could process up to 100% softwood if it desired, because the permit does not restrict the softwood processed at the facility. Softwood emits substantially more VOCs than hardwood, and at the current production limit the facility would emit 540 tons per year of VOCs if it processed 100% softwood. Georgia must therefore implement facility-wide VOC limit. The problem with Varn Wood Pellets' permit is basically the opposite of that at Appling County: the permit contains a facility-wide limit on VOCs, but no production limit. For facilities like Varn Wood Pellets, which do not utilize adequate pollution controls to reduce VOC emissions below the major source threshold when operating at full capacity, permits must restrict production to a point where emissions are below the major source threshold. In response to comments submitted by EIP on behalf of other environmental groups, Georgia has proposed to issue a new permit that will contain a production limit.

### *Pellet Mill Near Valdosta Begins Construction Without Permit.*

Under the Clean Air Act and Georgia law, it is illegal to commence construction of a source of air pollution without obtaining a permit. Blue Sky Biomass, however, ignored the law and began constructing a 400,000 ton per year pellet mill north of Valdosta, Georgia. The company's website shows considerable concrete work, and the installation of at least four pellet presses. Georgia officials have apparently not taken action to halt construction or require the facility to apply for a permit. Because the facility has not applied for a permit, it is impossible to know exactly how the facility will be designed and whether it will

adequately control for VOC and hazardous air pollutants.

## Alabama

Alabama hosts three pellet mills exporting to Europe, including Zilkha Biomass, near Selma, and Mohegan Renewable Energy (formerly Lee Energy Solutions) near Birmingham. Three new mills are proposed in the state, including two large Enviva plants—Enviva Childersburg outside of Birmingham, and Enviva Abbeville, north of Dothan.

**Table M. Annual Air Pollution from Exporting Pellet Mills in Alabama (Tons)**

|                                | Particulates | CO    | NO <sub>x</sub> | VOCs  | CO <sub>2</sub> |
|--------------------------------|--------------|-------|-----------------|-------|-----------------|
| Existing Plants (3)            | 499          | 510   | 584             | 999   | 649,836         |
| Existing (3) and Proposed (3)* | 1,138        | 1,259 | 1,357           | 1,932 | 1,233,545       |

\* Emissions from proposed plants based on permitting materials and similar facilities.

### *Pellet Mill in Selma Vastly Exceeds Limits on Carbon Monoxide and VOC Emissions.*

The Zilkha Biomass mill just east of Selma is regulated as a minor air pollution source based on permit restrictions that serve to limit facility-wide emissions of pollutants like VOCs and carbon monoxide to below the major source threshold of 250 tons per year. When Zilkha Biomass first conducted emissions testing in 2017, however, the tests revealed that the facility emits 456 tons of CO per year when operating at the plant's design capacity—nearly twice the major source threshold. This means the facility has triggered the Clean Air Act's New Source Review requirements for major sources, including the obligation to install the best available control technology. This technology would likely be a regenerative catalytic oxidizer.

The facility is also almost certainly a major source of VOCs. The permit improperly exempts units known as hammermills and pellet coolers from emissions testing requirements, so the true rate is not known. However, emissions testing from every comparable wood pellet mill shows these units emit hundreds of tons more VOCs than Alabama believes. Emission factors from tests at a pellet mill in Georgia show Zilkha's hammermills and pellet coolers emit between 450 and 570 tons per year; emission factors from tests at a mill in Florida show these units emit 487 tons per year, and emission factors from tests at a mill in South Carolina show these units emitting 316 tons per year. Given that the wood dryer and the facility's unique and proprietary "black pellet" system also emit substantial amounts of VOCs, it is simply not plausible that Zilkha's facility-wide VOC emissions are below the 250 ton per year major source threshold.

### *Alabama Facility Emitted Twice as Much Particulate Matter Pollution than Permitted and Exceeded the Title V Threshold Without Obtaining a Title V Permit.*

Until late 2017, Lee Energy Solutions was a wood pellet manufacturer northeast of Birmingham (the facility is now owned and operated by Mohegan Renewable Energy). The facility has a capacity of 225,000 tons per year, although operations are limited to 150,000



tons per year in an attempt to avoid Title V permitting.<sup>83</sup> Unfortunately, even at this lower rate, the facility has violated both its permit limits and the Title V threshold for particulate emissions. In fact, the facility emitted more than double its hourly permit limits of particulates, and emitted 189 tons of particulates per year, well above the Title V threshold of 100 tons per year.<sup>84</sup> The facility claimed that the issue was a poorly functioning multicyclone control device on the dryer. Multicyclones are relatively low-tech devices which can be efficient at removing large particulates but remove 10% or less of the smallest particulates, which are the deadliest.<sup>85</sup> While a faulty multicyclone may have contributed somewhat, the larger issue is that the facility was utilizing only a multicyclone rather than control technology with much better removal capacity. All of the large facilities EIP surveyed utilize a particulate matter control device known as a wet electrostatic precipitator, which removes 99% of all particulate matter, and at least 90% of fine particulates (PM<sub>2.5</sub>).<sup>86</sup> Many smaller facilities like Lee Energy do not utilize this technology, and consequently have higher than necessary particulate matter emissions.

## Arkansas

Arkansas is home to one wood pellet facility currently operating, the Highland Pellets mill in Pine Bluff, and two proposed mills which have applied for or received initial construction permits (Zilkha Biomass in Monticello, and Highland Pellets South, in Ouachita County).

**Table N. Annual Air Pollution from Exporting Pellet Mills in Arkansas (Tons)**

|                                | Particulates | CO  | NOx | VOCs | CO <sub>2</sub> |
|--------------------------------|--------------|-----|-----|------|-----------------|
| Existing Plants (1)*           | 174          | 191 | 201 | 245  | 238,510         |
| Existing (1) and Proposed (2)* | 631          | 631 | 651 | 739  | 655,902         |

\* All emissions are estimates from permit reviews or applications, Highland Pellets has not submitted stack testing.

### *Arkansas Fails to Require Crucial Emissions Testing at Pine Bluff Mill*

The Highland Pellets mill is one of the newer and larger mills constructed, and it controls VOC and hazardous air pollutants from most of its units by routing emissions to the wood dryer's furnace. This process generally achieves 90% destruction of VOCs and hazardous air pollutants. The problem is, Highland Pellets does not do this for its pellet cooler emissions.<sup>87</sup> As noted above, pellet coolers can be massive sources of VOC emissions, with uncontrolled pellet coolers at some facilities emitting around 500 tons of VOCs per year (see the Table H above). These rates would mean Highland Pellets is greatly exceeding the 250 ton per year major source threshold as well as its permit limits. Despite this fact, Arkansas has not required emissions testing for VOCs from the pellet coolers—in fact the pellet coolers are the only major unit that is not required to test for VOCs. Given that the total VOC emissions for the plant are estimated to be up to 245 tons per year, the facility only has a 5 ton per year margin of error to avoid exceeding the major source threshold.<sup>88</sup> Therefore, the true rate of VOC emissions from the pellet coolers is crucial to ensuring the facility does not exceed the major source threshold; yet Arkansas has inexplicably exempted these particular units from testing requirements.

### *Piles of Wood Smolder Endlessly at Pine Bluff Pellet Mill*

In addition to the potential VOC issue identified above, the Highland Pellets mill in Pine Bluff has had major issues with smoke emissions. When nearby residents complained, stating that “smoke was leaving the site and blanketing the surrounding community,” Arkansas officials inspected the site but apparently did not take any corrective action.<sup>89</sup> According to the inspection, wood piles at the facility smolder and emit smoke continuously. The inspector’s report states: “As you drive by the property you will see several large piles of material . . . This morning, both of these kinds of piles were smoking, or more accurately, smoldering. Normal rainfall amounts do a good job of keeping the temperature inside the pile down and the wood wet enough to keep the smoldering in check. With the severe lack of rain this fall, that was evidently not the case and the smoke was worse than normal.”<sup>90</sup>

Improperly stored wood chips will frequently spontaneously combust, as large piles of decomposing wood produce heat. The smoke from this combustion is particularly harmful, as the low heat and incomplete combustion produces substantially higher levels of particulate matter, carbon monoxide, and VOCs than other forms of burning wood.<sup>91</sup> Studies have shown that smoldering pine emits 75 times more particulate matter pollution and 7 times more carbon monoxide than flaming fires.<sup>92</sup> In addition to the smoke, smoldering wood chips present an obvious risk of larger fires. As discussed in Part Three below, fires are a common problem at wood pellet industries. Highland Pellets has already had one fire since commencing operations in 2017.

## Part Two: Enviva is a Clear Outlier, Failing to Utilize Pollution-Reducing Controls Which are Standard in the Industry

As discussed above, most large pellet mills utilize at least a regenerative thermal oxidizer or other control device on their dryer. The only exceptions are facilities owned and operated by Enviva Biomass. Most of these are located in North Carolina, where the state has repeatedly allowed Enviva to avoid reducing pollution. EIP’s survey of new-generation pellet mills in the nation reveals that regenerative thermal oxidizers or other control technology are fundamental control devices which greatly reduce VOCs, yet Enviva has consistently claimed such controls are too expensive to install.<sup>93</sup> The fact is, however, that Enviva’s competitors are able to utilize controls not only on their dryers, but frequently on additional units as well.

Two of Enviva’s mills, Enviva Sampson (constructed in 2017) and Enviva Hamlet (under construction), both of which are near Fayetteville, North Carolina, are subject to the Clean Air Act’s “best available control technology” and “maximum available control technology” requirements. Under both requirements, the facility is required to reduce emissions to the level achieved by the best-controlled pellet mill in operation. Despite these requirements and the fact that other facilities do use very effective pollution controls, the two Enviva facilities

utilize no control devices whatsoever for VOCs or hazardous air pollutants. Each facility will emit more than 600 tons of VOCs and more than 50 tons of hazardous air pollutants once they reach full operation. Had the facilities actually complied with the Clean Air Act's control technology requirements and installed controls used by other pellet mills, each plant would emit less than 100 tons of VOCs and less than three tons of hazardous air pollution per year.

Table O on the following page shows VOC controls on wood dryers at the largest wood pellet mills in the country. Notably, the only Enviva plants which do utilize controls, Enviva Cottondale and the Colombo plant, were built by previous owners. Enviva acquired both plants after states had required the facilities to utilize controls.

**Table O. Enviva's Failure to Control Dryer VOC Emissions Makes Them the Dirtiest in the Industry**

| VOC Controls on Dryers at Pellet Mills Above 300,000 Tons Per Year Production Rate |       |                     |                                   |                          |                                        |
|------------------------------------------------------------------------------------|-------|---------------------|-----------------------------------|--------------------------|----------------------------------------|
| Facility                                                                           | State | Production Capacity | VOC Controls on Dryer?            | Current Softwood Percent | Dryer VOC Emissions (in tons per year) |
| Enviva Sampson                                                                     | NC    | 535,000             | No                                | 75%                      | 306                                    |
| Enviva Hamlet (proposed and permitted)                                             | NC    | 535,000             | No                                | 75%                      | 306                                    |
| Enviva Ahoskie                                                                     | NC    | 420,000             | No                                | 30%                      | 164                                    |
| Enviva Cottondale                                                                  | FL    | 821,000             | Yes (RTO)                         | 100%                     | 136                                    |
| Enviva Northampton                                                                 | NC    | 628,179             | No                                | 30%                      | 135                                    |
| Drax LaSalle                                                                       | LA    | 500,000             | Yes (RTO)                         | 100%                     | 128                                    |
| Enviva Southampton                                                                 | VA    | 535,000             | No                                | 10%                      | 122                                    |
| Georgia Biomass                                                                    | GA    | 826,000             | Yes (RTO)                         | 100%                     | 55                                     |
| Zilkha Monticello (proposed and permitted)                                         | AR    | 661,000             | Yes (RTO)                         | 100%                     | 51                                     |
| Hazlehurst                                                                         | GA    | 525,600             | Yes (Sent to burner) <sup>A</sup> | 100%                     | 32                                     |
| Highland Pellets                                                                   | AR    | 500,000             | Yes (Sent to burner) <sup>A</sup> | 100%                     | 22                                     |
| Highland Pellets South (proposed, permit application submitted)                    | AR    | 500,000             | Yes (Sent to burner) <sup>A</sup> | 100%                     | 22                                     |
| German Pellets                                                                     | TX    | 578,000             | Yes (RTO)                         | 100%                     | 21                                     |
| Westervelt                                                                         | AL    | 320,000             | Yes (RTO)                         | 100%                     | 20                                     |
| Colombo (Now Enviva Greenwood)                                                     | SC    | 669,000             | Yes (RTO)                         | 100%                     | 13                                     |
| Zilkha                                                                             | AL    | 300,000             | Yes (RTO)                         | 50-100% <sup>B</sup>     | 9                                      |
| Drax Amite                                                                         | MS    | 578,000             | Yes (RTO)                         | 100%                     | 7                                      |
| Drax Morehouse                                                                     | LA    | 500,000             | Yes (RTO)                         | 98%                      | 6                                      |

A. Emissions are routed to the furnace for VOC and HAP destruction, achieving 90% reduction

B. Facility processes a range of softwood, but is permitted as if it processed 100% softwood

## Part Three: Fires and Explosions

Wood pellets are designed to burn as efficiently as possible, so it shouldn't be surprising that the facilities manufacturing and storing wood pellets face a substantial risk of fires and explosions. What is surprising, however, is just how common and severe these fires and explosions are.<sup>94</sup> Of the 15 new generation pellet mills EIP surveyed, at least eight have had fires or explosions since 2010, including several resulting in injuries.<sup>95</sup> A “flash fire” at the Hazlehurst pellet mill in Hazlehurst, Georgia—the facility's second fire since commencing operations in 2014—seriously injured four employees.<sup>96</sup> The Westervelt wood pellet mill in Tuscaloosa, Alabama had an explosion in 2016 which injured an employee.<sup>97</sup> Enviva has had news-worthy fires at its Florida facility (Enviva Cottondale near Panama City), two fires at its Virginia facilities (Enviva Southampton and its port storage facilities, both in or near Chesapeake), and a North Carolina facility (Enviva Ahoskie north of Greenville).<sup>98</sup> German Pellets Texas alone had fires or explosions in April 2014, April 2015, May 2015, and February 2017, culminating in a two-month long fire in 2017 at German Pellets storage's silo in Port Arthur, Texas.<sup>99</sup> The silo ultimately collapsed, and smoke from the smoldering pellets caused dozens of Port Arthur residents to seek medical attention. The city of Port Arthur and residents have filed multiple lawsuits over the fire, and a court has ordered German Pellets to empty all of its silos and install proper fire-fighting technology. During the process of removing the pellets, a worker was killed when a pile of wood pellets collapsed.

Fires in silos can be particularly difficult to fight, as the German Pellets silo fire demonstrated. Fires can start deep in the silo under many tons of wood pellets thanks to spontaneous combustion, a common phenomenon when a large amount of wood is not properly stored, due to the heat generated from decomposing wood and lack of ventilation. Once a silo fire begins, it may burn for days, weeks, or months. Water is usually ineffective in fighting these fires, as water causes the top layer of pellets to expand, creating an impenetrable crust, preventing water from reaching the fire itself. In the case of the German Pellets fire, even after the silo collapsed more than a month after the fire began, fire fighters still struggled for weeks to stop the fire.<sup>100</sup> In another instance, after a fire burned for four days at a small pellet mill in West Monroe, Louisiana and injured a firefighter, the local fire chief reported that the fire was very difficult to extinguish, and that “there was really no safe way to do it quickly with a lot of wood chips smoldering and smoking.”<sup>101</sup> The uncontrolled burning of so much wood biomass accounts for huge amounts of harmful air pollution.

Beyond fires, explosions also occur. The primary culprit of explosions at wood pellet facilities is airborne wood dust, which is generated at all stages of manufacturing, storage, and transporting of wood pellets. Once this fine dust is suspended in the air it is extremely combustible. For instance, a 2011 blast at Georgia Biomass in Waycross, Georgia, rattled windows up to five miles from the facility.<sup>102</sup> While mills in the U.S. South have thus far escaped fatal explosions, an employee was killed by a dust explosion at a mill in British Columbia in 2012.<sup>103</sup>

The Clean Air Act addresses the risk of fires and explosions, yet many states are not fully implementing the Act's provisions in order to best reduce the risk. The Clean Air Act

contains a General Duty Clause which requires facilities producing or handling extremely hazardous substances to design, maintain, and operate their facilities in a safe manner.<sup>104</sup> As the long list of fires and explosions at wood pellet facilities show, wood dust qualifies as an extremely hazardous substance.<sup>105</sup> Unfortunately, permits issued to wood pellet manufacturing plants either fail even to mention the General Duty Clause, or provide only brief, non-specific references to it which do not discuss measures the facility needs to take to properly manage combustible dust. This is insufficient to prevent fires and explosions, and instead EIP believes permits must state that the General Duty Clause applies to the facility's handling of explosive dust and require the facility to perform specific steps that are sufficient to ensure that workers and others who live, work, recreate, or simply commute in the facility's vicinity are protected from the dangers posed by combustible dust. At a minimum, the permits should:

1. Identify the Clean Air Act's General Duty Clause as an applicable requirement with respect to the facility's handling of combustible dust.
2. Specifically require the facility to prepare a hazard analysis identifying the hazards associated with explosive dust and the facility's processes, potential fire and explosion scenarios, and the consequences of a fire or explosion.
3. Establish specific design and operation standards that the facility must meet to prevent a dust-related fire or explosion.
4. Establish recordkeeping and reporting requirements sufficient to demonstrate that the facility is meeting its General Duty Clause obligations.

Implementing these more specific requirements will not only aid in preventing releases of air pollution, but will serve to protect workers and neighbors from harm. Plant managers will benefit too, as EPA has brought enforcement actions against plants for failure to comply with the General Duty clause after accidents, and plant managers have responded that they were not aware of the Clause or its full requirements.

## Conclusion and Recommendations

The Clean Air Act only works to protect health and the environment when state agencies are fully implementing all of the Act's requirements. EIP calls on state agencies across the U.S. South to address the errors and omissions identified in this report, and to further make proactive moves to better understand and control emissions from this emerging industry in the future. EIP makes the following recommendations as initial steps to remedy the numerous deficiencies identified in this survey:

1. **Reexamine existing air permits and reissue stronger permits where needed.** Many of the air permits for wood pellet mills were issued before permitting agencies fully understood the scope of VOC and hazardous air pollutant emissions from the industry. These permits allow facilities to exceed the Clean Air Act's major source threshold and are legally deficient. States should take a careful look at permits for

wood pellet mills and assess whether the existing permits account for VOC and hazardous air pollutant emissions from each of the major units at the facility. Where exceedances exist, states should take immediate action to ensure facilities cease violating pollution limits.

2. **Require “major” sources of air pollution to install the best available control technology.** As this report reveals, many pellet mills with major source permits evade using the best available control technology, or any control technology at all, while facilities with minor source permits, often the same size or larger, do utilize controls. This is an unacceptable perversion of the Clean Air Act. States must require facilities with major source permits to reduce emissions to at least the level achieved by the best-controlled minor source facility.
3. **Institute production limits at minor source facilities.** Court decisions and EPA guidance dictate that production limits are necessary aspects of ensuring that facilities do not exceed the major source threshold. This is especially vital at minor source facilities which do not utilize sufficient controls to keep their emissions below legal limits when operating at full capacity. If a facility can exceed legal limits when operating at or near maximum production rates, states must require production limits that ensure the facility does not emit more pollution than legally allowed. Further, production limits allow state agencies and the public a reasonable method to determine whether a facility is exceeding Clean Air Act thresholds. Although a few permits EIP surveyed do incorporate production limits, the overwhelming majority of permits which should have production limits do not and are therefore legally deficient.
4. **Ensure Communities are Notified of and Able to Participate in Permitting Decisions.** As noted above, several permits allowing the construction or modification of wood pellet plants were issued without public notice. Communities near the proposed facilities were not adequately informed of the decision to allow sources of air pollution to locate in their backyard. States should revise their regulations and procedures to include public notice and opportunity for meaningful input from those most affected by a plant’s air pollution.
5. **Require annual emissions testing.** Many permits rely on emissions estimates—frequently outdated and inaccurate—rather than source-specific emissions testing to determine the level of air pollution emitted from wood pellet mills. This is especially true for VOC and hazardous air pollution, and from units other than the wood dryer such as pellet coolers and hammermills. While continuous emissions monitoring is the best method to determine actual levels of pollution emitted, where states do not require this they must at least require annual testing of each of the major units at pellet mills for volatile organic compounds and hazardous air pollutants.
6. **Reduce the risk of fires and explosions.** Fires and explosions from wood dust plague the wood pellet industry, and the Clean Air Act gives states a powerful tool to address the problem in the General Duty Clause. States must begin utilizing the

General Duty Clause effectively and require facilities to comply with their general duty under the Clean Air Act to design and maintain a safe facility.



# Appendix A: Clean Air Act Permitting in the Context of Wood Pellet Manufacturing

This Appendix provides a brief primer on the basic framework of the Clean Air Act and how it applies to the wood pellet industry. The Clean Air Act requires sources of air pollution to obtain various types of permits based on the amount and type of pollution emitted, as well as the nature and location of the source. These permits generally contain emission limits, operating standards, or other requirements to protect air quality. One key thing to remember is that these permitting programs are primarily administered by state environmental agencies, and while the federal EPA has some oversight, the vast majority of decision-making and enforcement occurs at the state level. This means that permits and enforcement can vary considerably from state to state.

## *State Construction Permits*

In general, sources of air pollution must obtain at least a state permit to construct and operate a new source of air pollution. These permits may or may not be open to public notice and comment, and states are relatively free to issue these permits on their own terms. Unless a facility triggers one of the other types of permits, this may be the only permit a facility needs. Wood pellet plants, especially large export-based plants, need additional permits due to their high emission rates.

## *Title V Permits*

Title V of the Clean Air Act establishes a federal operating permit program. Title V permits incorporate all legal requirements for air pollution that apply to a facility into a single permit. Most importantly, Title V permits require facilities to demonstrate how they will comply with each of the legal requirements, with conditions for monitoring, record keeping, and reporting. Facilities which emit or have the potential to emit more than 100 tons per year of any regulated pollutant, 25 tons per year of HAPs, or 10 tons per year of any single HAP must apply for a Title V permit within a year after they begin operation. Large wood pellet facilities all emit VOCs, and frequently other regulated pollutants or HAPs, above the Title V threshold, so every facility in this report has at least a Title V permit. Finally, although Title V is a federal operating permit in that the requirements are specified by the Clean Air Act, responsibility for the issuance and enforcement of these permits rests mostly with state agencies.

## *New Source Review and Prevention of Significant Deterioration Permits*

New Source Review is the Clean Air Act's permitting program designed to limit emissions from large sources of air pollution by requiring a permit before a "major source" begins construction or undertakes a modification. Although EPA has created a stricter definition of "major source" for many industries (a facility with the potential to emit 100 tons per year of a regulated pollutant), for wood pellet mills, "major source" means a facility with the potential to emit more than 250 tons per year of a regulated pollutant. It is worth pointing out that the threshold is based on potential emissions rather than actual emissions, so



even if a facility usually operates at 75% capacity, the relevant emissions are those produced while operating at 100% capacity.

New Source Review consists of several types of permits, but the permit at issue in the wood pellet industry is known as a Prevention of Significant Deterioration (PSD) permit. PSD permitting requires facilities to conduct impact analyses, air dispersion modelling, and other protective steps, but the heart of PSD permitting is the “best available control technology” requirement. On a technical level, PSD does not actually require a facility to install the best available control technology, but it does require a facility to limit emissions to the level achievable by using the best available control technology. In practice, however, PSD is synonymous with utilizing the best available control technology, and permitting agencies are supposed to select the best available control technology on a case-by-case basis and implement corresponding emission limits.

PSD permitting is meant to be rigorous, and most of the wood pellet industry has attempted to remain below the 250 ton per year threshold to avoid it (see the section on synthetic minor limits below). Only three facilities have gone through New Source Review and PSD permitting before construction: Enviva Hamlet, Enviva Sampson, and Drax LaSalle. Two other facilities, German Pellets and Enviva Cottondale, are currently going through PSD permitting after discovering they were exceeding 250 tons per year of VOCs. Many of the issues revealed in EIP’s survey involve facilities either exceeding the 250 ton per year threshold and not going through PSD, or states failing to select controls which are widely used in the industry as the best available control technology.

### *Hazardous Air Pollutants and Permitting*

Hazardous air pollutants (HAPs) are those pollutants which EPA considers especially toxic or carcinogenic, and are more strictly regulated under the Clean Air Act. Unlike the permits discussed above, there is no unique permit needed to emit HAPs; instead, facilities which have the potential to emit more than 10 tons per year of any single HAP, or more than 25 tons per year of all HAPs combined, must apply for a Title V permit and utilize the maximum achievable control technology, which is meant to be stricter than other requirements such as PSD’s best available control technology. For most industries, EPA has promulgated national standards and limits which represent the maximum achievable control technology. The wood pellet industry, however, is so new that EPA has not established any standards. This means it is up to the states to develop, on a case-by-case basis, maximum achievable control technology standards and emissions limits for wood pellet facilities. Unfortunately, for facilities which qualify, states have frequently failed to require any control technology at all, and several facilities emit substantially more HAPs than they would if states actually required maximum achievable control technology.

### *Synthetic Minor Sources*

Each of the above permitting realms has a triggering pollution threshold, e.g. 250 tons per year of any PSD pollutant. The key to these thresholds is that they are triggered by the *potential* to emit that pollutant, rather than whether a facility actually emits more than the threshold in a given 12-month period. Facilities with such a potential are known as “major sources,” for example a facility which has the potential to emit more than 100 tons per year

of a regulated pollutant is a major source in terms of Title V permitting. Facilities which have a potential to emit above a given threshold but wish to avoid the stricter permitting can opt to take limits to remain a minor source. These are known as “synthetic minor limits” because the facility is not truly a minor source, but will be treated as such if it complies with the limit. To be valid synthetic minor limit, the limit must be enforceable, ideally in terms of a production or operating limit. A good example would be a facility which would emit 275 tons per year of VOCs when operating at a production rate of 400,000 tons per year (and would therefore be a major source for PSD), but takes a legal limit which restricts operations to just 350,000 tons per year, which lowers VOC emissions to below 250 tons per year. Most wood pellet facilities are permitted as synthetic minor sources for PSD, but only have a blanket emission limit in their permits, such as “the facility shall emit less than 249 tons per year of VOCs,” rather than an actual production limit. Unfortunately, such blanket limits are difficult to enforce in the real world if a facility does not accurately understand its rate of emissions. This is why many large pellet mills were in fact exceeding their 249 ton per year limits, because states and the industry did not realize that many units emitted much more VOCs than they believed.

# Notes

<sup>1</sup> Florida has agreed to require Enviva Cottondale wood pellet plant to go through major source permitting in response to recent comments submitted by EIP. It remains to be seen whether Florida will require the best available control technology, despite the fact that the Clean Air Act requires it.

<sup>2</sup> Dogwood Alliance, Natural Resources Defense Council, Southern Environmental Law Center, “European Imports of Wood Pellets for “Green Energy” are Devastating US Forests,”

[https://www.dogwoodalliance.org/wp-content/uploads/2017/05/NRDC\\_2014-](https://www.dogwoodalliance.org/wp-content/uploads/2017/05/NRDC_2014-2017Booklet_DigitalVersion-resize.pdf)

[2017Booklet\\_DigitalVersion-resize.pdf](https://www.dogwoodalliance.org/wp-content/uploads/2017/05/NRDC_2014-2017Booklet_DigitalVersion-resize.pdf); Drouin, Roger, “Wood Pellets: Green Energy or New Source of CO<sub>2</sub> Emissions,” *Yale Environment* 360 (Jan. 22, 2015),

[http://e360.yale.edu/features/wood\\_pellets\\_green\\_energy\\_or\\_new\\_source\\_of\\_co2\\_emissions](http://e360.yale.edu/features/wood_pellets_green_energy_or_new_source_of_co2_emissions).

<sup>3</sup> Copley, Andrew. “Wood Bioenergy Update and Wood Pellet Exports: Q1 2017,” Forisk Consulting (Feb. 17, 2017), <http://forisk.com/blog/2017/02/17/wood-bioenergy-update-wood-pellet-exports-q1-2017/> ; National Renewable Energy Laboratory, Energy Analysis, International Trade of Wood Pellets,(DATE), available at <https://www.nrel.gov/docs/fy13osti/56791.pdf>.

<sup>4</sup> Campilho, Pedro. “The Asian Biomass Market: Challenges and Opportunities Ahead.” *Biomass Magazine*, November 30, 2017. <http://biomassmagazine.com/articles/14854/the-asian-biomass-market-challenges-and-opportunities-ahead>.

<sup>5</sup> Science Advisory Board Review of EPA’s Accounting Framework for Biogenic CO<sub>2</sub> Emissions from Stationary Sources 7 (Sept. 28, 2012); “Letter from Over 100 Scientists to North Carolina Governor Roy Cooper,” November 14, 2017; Mitchell, S.R. et al., Carbon debt and carbon sequestration parity in forest bioenergy production. *Global Change Biology Bioenergy* 4: 818-827 (2012); Schulze, E.-D. et al., Large-scale bioenergy from additional harvest of forest biomass is neither sustainable nor greenhouse gas neutral. *Global Change Biology Bioenergy* 4: 611-616 (Apr. 2, 2012); McKechnie, J. et al., Forest bioenergy or forest carbon? Assessing trade-offs in greenhouse gas mitigation with wood-based fuels. *Environ. Sci. Technol.* 45: 789-795 (2011); Repo, A. et al., Indirect carbon dioxide emissions from producing bioenergy from forest harvest residues. *Global Change Biology Bioenergy* 3: 107-115 (2010); Gunn, J., et al., Manomet Center for Conservation Sciences, Massachusetts Biomass Sustainability and Carbon Policy Study: Report to the Commonwealth of Massachusetts Department of Energy Resources (2010).

<sup>6</sup> Koester, Stefan and Davis, Sam, Siting of Wood Pellet Production Facilities in Environmental Justice Communities in the Southeastern United States. *Environmental Justice* (ahead of print) (Jan. 2018).

<sup>7</sup> Dogwood Alliance, Wetland Logging Investigation Southampton, VA & Ahoskie, NC: May 13/14<sup>th</sup>, 2015, <https://www.dogwoodalliance.org/wp-content/uploads/2015/06/Wetlands-Logging-Investigation-Flyer.pdf>.

<sup>8</sup> Qian Di, M.S. et al., Air Pollution and Mortality in the Medicare Population. *New England Journal of Medicine* 377:15, 1497-1499. (2017), <http://www.nejm.org/doi/full/10.1056/NEJMoA1702747>.

<sup>9</sup> For instance, German Pellets Texas reports 63 tons per year in its PSD application, Enviva Northampton reports 75 tons per year in their Title V Permit application, and Enviva Southampton reports 77 tons per year in their Title V Permit Application. See German Pellets Texas Permit Amendment Application, Permit No. 98014, (Sep. 2016); North Carolina DAQ Application Review for Enviva Pellets Northampton, Permit No. 10203T06; Enviva Pellets Southampton Title V Permit Application, Permit No. 61653 (Jan. 4, 2016).

<sup>10</sup> Revised PSD Air Quality Construction and Operating Permit Application for Enviva Pellets Sampson, August, 2014; PSD Air Quality Construction and Operating Permit Application for Enviva Hamlet, January, 2014.

<sup>11</sup> EPA, Air Pollution Control Technology Fact Sheet for Regenerative Incinerator. EPA-452/F-03-021.

<sup>12</sup> See *supra*, note 10; see also North Carolina DEQ Application Review Including Final Determination for Enviva Pellets Sampson (Nov. 17, 2014); North Carolina DEQ Application Review Including Final Determination for Enviva Pellets Hamlet (Mar. 29, 2016).

<sup>13</sup> Revised PSD Air Quality Construction and Operating Permit Application, Enviva Pellets Sampson, Prepared by Trinity Consulting (Aug. 2014), § 4.4.3.5. (“RTO abatement technology is deemed to be cost prohibitive”); see also PSD Air Quality Construction and Operating Permit Application, Enviva Pellets Hamlet, Prepared by Trinity Consulting (Jan. 2015), § 4.4.3.5 (“RTO abatement technology is deemed to be cost prohibitive”).

---

<sup>14</sup> Compare, for instance, AP-42 emission factors for particle board dryers at 100% softwood of 4.9 lb/ODT to 100% hardwood at .24 lb/ODT. (AP-42 § 10.6.2, Table 10.6.2-3).

<sup>15</sup> EPA Air Pollution Control Technology Fact Sheet, Regenerative Incinerator, EPA-452/F-03-021.

<sup>16</sup> Stermann, John et al., Does Replacing Coal with Wood Lower CO<sub>2</sub> Emissions? Dynamic Lifecycle Analysis of Wood Bioenergy. *Environ. Res. Lett.* 13 (2013); UK Department of Energy and Climate Change, Life Cycle Impacts of Biomass Electricity in 2020 at 12-13 (July 2014).

<sup>17</sup> Forest Stewards Guild, Ecological Forestry Practices for Bottomland Hardwood Forests of the Southeastern U.S., May 2016, [http://www.forestguild.org/publications/research/2016/FSG\\_Bottomland\\_Hardwoods.pdf](http://www.forestguild.org/publications/research/2016/FSG_Bottomland_Hardwoods.pdf).

<sup>18</sup> *Id.*

<sup>19</sup> U.S. EPA, Integrated Risk Information System.

<sup>20</sup> *Ass'n of Irrigated Residents v. Fred Schakel Dairy*, 634 F.Supp.2d 1081 (E.D. Cal., 2008), *see also American Forest and Paper Association v. EPA*, 294 F.3d 113, 118-119 (D.C. Cir. 2002).

<sup>21</sup> *See* Table O, showing control devices on dryers at the facilities surveyed by EIP. Only Enviva facilities operate without an RTO or similar device.

<sup>22</sup> Memorandum from Manny Patel, Georgia EPD, to Eric Cornwell, Georgia EPD, entitled “Emission Factors for Wood Pellet Manufacturing” (Jan. 29, 2013), containing stack testing results from Georgia Biomass showing 95% reduction of formaldehyde, acetaldehyde, and methanol with the use of an RTO.

<sup>23</sup> *See supra*, note 15.

<sup>24</sup> North Carolina DEQ Air Quality Permit for Enviva Northampton, Permit No. 10203R00 (Mar. 9, 2012).

<sup>25</sup> *Id.* at 11.

<sup>26</sup> Application to Modify Air Permit No. 10203R03 for Enviva Pellets Northampton (May 2015).

<sup>27</sup> North Carolina DEQ Air Quality Permit for Enviva Northampton, Permit No. 10203R04 (Oct. 12, 2015).

<sup>28</sup> North Carolina State Implementation 15A NCAC 2D .0530(i) (“[w]hen a particular source or modification becomes a major stationary source or major modification solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980 on the capacity of the source or modification to emit a pollutant ... then the provisions of [North Carolina’s PSD regulations] shall apply to the source or modification as though construction had not yet begun on the source or modification.”). The most recent version of North Carolina’s PSD regulations includes the same language but in a different place: 15A NCAC 2D. 0530(k). Nearly identical language appears in EPA’s federal PSD regulations at 40 C.F.R. 52.21(r)(4).

<sup>29</sup> *See supra*, note 15.

<sup>30</sup> The permit review document for both the original construction permit and the permit to increase VOC emissions contain the following statement: “Public notice is not required for this state-only construction permit under 15A NCAC 02Q .0300.” North Carolina DEQ Air Permit Reviews for Air Permits No. 10203R00 and 10203R04.

<sup>31</sup> 40 CFR Part 51, Subpart I (Requirements for Preparation, Adoption, and Submittal of Implementation Plans—Review of New Sources and Modifications) requires 30 days public notice and opportunity to comment for both minor and major new sources of air pollution. 40 CFR §51.161.

<sup>32</sup> The Clean Air Act is clear that before a permit can be issued to a major facility like Enviva Hamlet, the state must hold a public hearing. North Carolina, however, believes it is their prerogative whether to hold a hearing, based on whether North Carolina regulators determine that there is sufficient public interest in the proposed permit. Even if this were a valid interpretation, North Carolina still failed to hold a hearing under the state’s own guidelines. North Carolina ignored repeated requests for a hearing, and approximately 300 public comments, showing there was indeed substantial public interest.

<sup>33</sup> *See, e.g.* North Carolina DEQ Air Quality Permit for Enviva Hamlet, Permit No. 10365R00 (Mar. 29, 2016) (listing the facility’s address with an incorrect zip code placing the facility some 90 miles east of its intended location). Other errors include public notice documents with no street address or an incorrect street address.

<sup>34</sup> German Pellets Draft Permit No. 98014, Maximum Allowable Emission Rates table (showing maximum emissions at 579 tons per year based on stack testing at the facility).

<sup>35</sup> Permit Amendment Application for German Pellets, Prepared by Trinity Consulting (Sep. 2016), § 10.2.2.

<sup>36</sup> *Id.*, § 11.1.2.

<sup>37</sup> EPA New Source Review Workshop Manual, Chapter B, § IV.A, at B.11, *available at* <https://www.epa.gov/sites/production/files/2015-07/documents/1990wman.pdf>.

---

<sup>38</sup> Title V Issuance Application, Drax Amite, prepared by FC&E Engineering (Aug. 2016), Appendix B: Emissions Calculations.

<sup>39</sup> *Id.*

<sup>40</sup> See Florida DEP Technical Evaluation & Preliminary Determination for Green Circle Bio Energy Permit No. 0630058-014, August 6, 2013, at 5 (referencing the 2010 testing and giving an emission rate of .639 lb/ODT. When a 10% margin is added to this rate the resulting emission rate is .703 lb/ODT, almost exactly the .704 lb/ODT Drax cited.).

<sup>41</sup> *Id.*

<sup>42</sup> *Id.* The emission factor of 3.25 lb/ton is back calculated from the reported post-dryer annual VOC emissions (1,344 tons per year) and a production rate of 827,000 tons per year.

<sup>43</sup> See *supra*, note 15.

<sup>44</sup> Mississippi DEQ Statement of Basis for Drax Amite's Draft Title V Permit (Jun. 20, 2017), at 4.

<sup>45</sup> Air Emission Test Report for Enviva Wiggins, Prepared by Air Control Techniques (Oct. 31, 2013), at 1.

<sup>46</sup> *Id.*; State of Mississippi Air Pollution Control Title V Permit No. 2540-00025 (Nov. 30, 2015), at 15.

<sup>47</sup> Air Emission Test Report for Enviva Amory, Prepared by Air Control Techniques (Oct. 31, 2013), at 1.

<sup>48</sup> See, e.g., emissions in Table B, note that the emission rates for facilities like Hazlehurst and Drax Amite are after an RTO has removed 95% of HAP emission, which is not the case at Enviva Amory, meaning emissions at Enviva Amory should be much higher.

<sup>49</sup> Memorandum from Shannon Vogel, NC DEQ Stationary Source Compliance Branch to Robert Fisher, NC DEQ Washington Regional Office and Yuki Puram, Air Quality Permitting Section, Re: Emissions Testing Performed in Amory and Wiggins Mississippi (Oct. 9, 2015).

<sup>50</sup> *Id.*

<sup>51</sup> State of Mississippi and Federally Enforceable Air Pollution Control Permit for Enviva Amory, Permit No. 1840-00082, Issued May 2, 2007 and Modified April 16, 2008, October 19, 2010, and March 4, 2011.

<sup>52</sup> *Id.* at 16.

<sup>53</sup> Memorandum from Manny Patel, Georgia EPD, to Eric Cornwell, Georgia EPD, entitled "Emission Factors for Wood Pellet Manufacturing" (Jan. 29, 2013).

<sup>54</sup> State of Mississippi Air Pollution Control Title V Permit No. 1840-00082 for Enviva Amory (Aug. 4, 2015).

<sup>55</sup> *Id.*

<sup>56</sup> See *supra*, note 54.

<sup>57</sup> Because the stack testing report did not include the rate of softwood processed, it is impossible to develop a source-specific emission factor for Enviva Amory. Instead, EIP applied the emission factors from Georgia Biomass, which are widely considered to be the best emission factors for 100% softwood facilities, and applied those emission factors to Enviva Amory's capacity of 125,000 tons per year. See *supra* note 15. Notably, even if the Georgia Biomass factors give relatively higher-than-actual emission estimates, the facility would still be well above the 250 ton per year threshold.

<sup>58</sup> 185 tons per year of VOC emissions at 60% softwood and 99,000 tons per year production rate gives an emission factor of 3.73 lb/ODT. Scaling this emission factor to 65% softwood gives an emission factor of 4.04 lb/ODT, which applied to the facility's current production rate of 121,000 tons per year results in 253 tons per year of VOCs.

<sup>59</sup> Drax Morehouse operates at 620,000 tons per year and claims to emit 20 tons per year of VOCs, for comparison testing at Enviva Cottondale found 460 tons per year of VOCs when operating at 610,000 tons per year, testing at Georgia Biomass found up to 533 tons per year of VOCs while operating at 820,000 tons per year, and testing at German Pellets Texas reports up to 446 tons per year of VOC emissions when operating at 578,000 tons per year.

<sup>60</sup> Drax Title V Air Permit Modification Application for Drax Morehouse (Aug. 2016), Section 5.0 Emissions Calculations. Note that when Drax submitted this same testing to Mississippi to support its claims of low VOCs at Drax Amite, they added an asterisk to the pellet cooler testing, labelling it "engineering testing data." No other portion of Drax's testing contained such an asterisk, and EIP assumes this is to denote that the pellet cooler testing was not conducted pursuant to any requirement or EPA-methodology.

<sup>61</sup> Louisiana's Air Permit Briefing Sheet for the November 17, 2017 Title V Air Permit Modification gives 20.95 tons per year of VOCs from the pellet coolers, an identical rate to Drax's emission factor from their permit application, showing that Louisiana accepted Drax's emission factor. A December 22, 2017 phone conversation with Steven Schwartz, Louisiana DEQ's Waste Permits Division (the Division's officer responsible for reviewing Drax Morehouse's stack tests), confirmed that the department never received any

---

stack testing data concerning the pellet coolers. Further, Drax Morehouse's stack testing report only shows PM testing from the pellet coolers, and Louisiana DEQ's review of these tests also only show PM testing from the pellet coolers. *See* Letter from James Meyers, Engineering Manager, Waste Permits Division, LDEQ to Michael Bellow, Drax Environmental Health & Safety Monitor, RE: Compliance Tests Conducted February 10-24, 2016.

<sup>62</sup> Louisiana's Air Permit Briefing Sheet for the November 17, 2017 Title V Air Permit Modification.

<sup>63</sup> Assuming the worst-case scenario that the facility-wide emissions are 708 tons per year, and a VOC destruction rate for an RTO of 95%, total emissions from the dryer, hammermills, and pelletizing lines would be 35.4 tons per year.

<sup>64</sup> Virginia DEQ Stationary Source Permit to Construct and Operate, Registration No. 61653 for Enviva Pellets Southampton (Sep. 5, 2012).

<sup>65</sup> The exact rate is not available, but applying Georgia Biomass emission factors approximately 900 to 1,000 tons per year of VOCs.

<sup>66</sup> Letter from Joe Sullivan, Trinity Consultants to Troy Breathwaite, Virginia DEQ, Re: Air Quality Permit Application (May 9, 2013). *See also* Virginia DEQ Stationary Source Permit to Construct and Operate, Registration No. 61653 for Enviva Pellets Southampton (Aug. 15, 2013).

<sup>67</sup> A thorough review of Virginia DEQ permitting documents related to Enviva Southampton provided by the state in response to an EIP Freedom of Information Act request reveals no discussion of HAP emissions after the switch to hardwoods. The only reference to HAP emissions are found in Enviva's applications.

<sup>68</sup> Enviva developed a weighted emission factor by scaling HAP emissions based on VOC emissions, as such: "To account for hardwood HAP & TAP [toxic air pollutants] emissions, factors were conservatively calculated by taking the AP-42 HAP factors for 100% softwood (green) and multiplying by the ratio of the total listed VOC emission factors for hardwood and softwood (0.24 / 4.7)." Enviva Pellets Southampton Title V Air Permit Application (Jan. 4, 2016), Table 5 ("Rotary Dryer -HAP and TAP Wood Combustion Emissions"). Under this method, Enviva assumes each HAP is therefore reduced at the same rate total VOCs are reduced. Rather than base all the HAP emission factors for a given hardwood content on the sliding VOC scale, EIP used the ratio between a given HAP in the 100% softwood AP-42 source category and the emission factor for the same HAP in the 40 to 60% source category to create a HAP-specific rate of decrease (AP-42 Table 10.6.2-3 SCC 3-07-006-25 and SCC 3-07-006-26 respectively). This method does not assume that all HAPs are reduced at the same rate, but instead accounts for the unique emission rates of each HAP. For formaldehyde the emission factor at 100% softwood is .14 lb/ODT, and at 50% softwood (e.g. the middle point of the 40 to 60% AP-42 category), the emission factor is .096 lb/ODT. This amounts to a reduction in formaldehyde emissions of 31.43%, whereas total VOCs between the same two source categories are reduced from 4.7 lb/ODT to 1.6 lb/ODT, for a reduction of 65.96%. This shows that formaldehyde emissions do not decrease at the same rate as total VOCs, and instead decrease much more slowly.

<sup>69</sup> Appling County Wood Pellets, a facility in Georgia, conducted three sets of HAP testing in 2017. In each set of testing, Appling tested at 70% hardwood, 80% hardwood, and 100% hardwood. In two out of three tests, acetaldehyde and formaldehyde increased as hardwood increased. Averages of all three tests revealed emissions of formaldehyde at .85 lb/hour at 70% hardwood and 1.11 lb/hour at 100% hardwood; acetaldehyde at .52 lb/hour at 70% hardwood and .61 lb/hour at 100% hardwood; methanol was emitted at 1.33 lb/hour at both 70% and 100% hardwood. Further, studies of lumber and engineered wood dryers show that during the wood drying process, hardwood emits significantly more methanol than softwood. For instance, one study assessing HAP emissions from oriented strandboard drying showed hardwood emitting nearly three times as much methanol as softwood southern pine, at .33 lb/ODT and .12 lb/ODT respectively. *See* Milota, Michael, "Emissions from Wood Drying: the Science and the Issues," Forest Products Journal, 2000, Issue 50(6). Another study of wood drying, conducted at lumber kilns, tested five species of softwood and one species hardwood for HAP emissions, including methanol. The results again showed that the hardwood species emitted much higher rates of methanol than any of the softwoods. *See* Milota, Mike and Mosher, Paul, "Emissions of Hazardous Air Pollutants from Lumber Drying," Forest Products Journal, July 2008 Issue 7/8, at 50-55. Notably, the raw data which Enviva relies upon for its methanol emission rate (known as AP-42 emission factors) is based on just three particle board dryers, and EPA gave the data one of the lowest reliability ratings. Enviva relies on the methanol emission factor at AP-42 § 10.6.2, Table 10.6.2-3 SCC 3-07-006-26. Out of the wood-fired rotary dryers tested to develop the methanol AP-42 emission factors,



---

there are only five sources processing any significant amount of hardwood (all of which processed 55% hardwood and 45% softwood pine). Of these five, two are noted to be pre-dryers and have substantially lower emissions than the other dryers, and therefore should not be used to estimate emissions from a full-scale rotary dryer. AP-42's emission factor, however, does not exclude the pre-dryer tests from the average for the emission factor, which means the final emission factor is biased low by these pre-dryer tests. *See* AP-42 § 10.6.2 Data Sets, Rotary Dryer category, Excel spreadsheet available at <https://www3.epa.gov/ttn/chief/ap42/ch10/index.html>.

<sup>70</sup> AP-42 § 10.6, *see* note 77.

<sup>71</sup> *See* note 77. At 10% softwood the emission factor is .0608 lb/ton. This rate applied to Enviva Southampton's production rate is 16.2 tons per year.

<sup>72</sup> Enviva estimated the dryer formaldehyde emissions at 5.87 tpy and facility wide HAP emissions at 21.8, while EIP estimates formaldehyde dryer emissions at 16.2 tpy, which pushes facility wide emissions to 31.4 tpy. *See* Title V Permit Application for Enviva Southampton.

<sup>73</sup> Appling County Wood Pellets, a facility in Georgia, conducted three sets of HAP testing in 2017. In each set of testing, Appling tested at 70% hardwood, 80% hardwood, and 100% hardwood. EIP averaged all three sets of testing at each softwood ratio, then averaged the emission factor for 80% hardwood and 100% hardwood to estimate emissions at 90% hardwood, which is what Enviva Southampton processes. These emission factors are .08 lb/odt for methanol, .033 lb/odt for acetaldehyde, and .061 lb/odt for formaldehyde.

<sup>74</sup> Florida DEP Draft Statement of Basis for Title V Air Operation Permit Renewal, Permit No. 0630058-020-AV.

<sup>75</sup> Florida DEP Consent Order OCG File No. 17-1134 (Nov. 15, 2017).

<sup>76</sup> Florida DEP Technical Evaluation & Preliminary Determination for Green Circle Bio Energy, Project No. 0630058-014-AC, Aug. 6, 2013 at 4.

<sup>77</sup> South Carolina DHEC, Bureau of Air Quality Construction Permit No. 1240-0133-CB (Jan. 12, 2018); Statement of Basis for Air Permit No. 1240-0133-CB (Jan. 12, 2018).

<sup>78</sup> *Id.*

<sup>79</sup> *Id.*

<sup>80</sup> Custom Stack Analysis, LLC Report on Stack Tests at Colombo Energy, June 19 through July 8, 2017. Colombo submitted this testing to SC DHEC, with the caveat that they were not submitting the June testing in order to meet its source testing obligation.

<sup>81</sup> Air Emission Test Report for Colombo Energy, Prepared by John Richards, Ph.D., P.E., Air Control Techniques (Dec. 4, 2017).

<sup>82</sup> Phone conversation between Patrick Anderson, EIP, and Michael Shroup, Manager, SC DHEC Source Evaluation Section (Jan. 25, 2018).

<sup>83</sup> Alabama DEM Synthetic Minor Operating Permit Nos. 703-0041-X001 through X003 for Lee Energy Solutions, August 12, 2009 (restricting operations to 5,840 hours per year).

<sup>84</sup> *In re: Lee Energy Solutions, LLC*, Alabama Department of Environmental Managements, Consent Order No. 16-023-CAP (Dec. 29, 2015).

<sup>85</sup> Biomass Energy Resource Center, Particulate Matter Emissions-Control Options, 2011, table at 9. Link: [http://www.biomasscenter.org/images/stories/FSE\\_PM\\_Emissions.pdf](http://www.biomasscenter.org/images/stories/FSE_PM_Emissions.pdf)

<sup>86</sup> *Id.*

<sup>87</sup> ADEQ Operating Air Permit No. 2341-AOP-R1 for Highland Pellets, LLC (Sep. 15, 2015), at 26.

<sup>88</sup> *Id.*

<sup>89</sup> Arkansas Department of Environmental Quality Air Division Complaint Report, PDS # 23234, Dec. 14, 2017.

<sup>90</sup> *Id.*

<sup>91</sup> Ho Kim, Yong et al., "Mutagenicity and Lung Toxicity of Smoldering vs. Flaming Emissions from Various Biomass Fuels: Implications for Health Effects from Wildland Fires," *Environ Health Perspect.* 126(1):017011 (Jan. 2018); Holder, Amara, et al, EPA Office of Research and Development, PM and VOC Speciation by Combustion Phase (2017).

<sup>92</sup> *Id.*

<sup>93</sup> For instance, in each case of each of Enviva's two most recent facilities in North Carolina, Enviva Sampson and Enviva Hamlet, as well as at the Virginia Enviva Southampton plant, Enviva dismissed regenerative

thermal oxidizers as “clearly cost prohibitive.” Air Quality Permit Application, Enviva Pellets Southampton, Prepared by Trinity Consultants (May 9, 2013); *see also* Revised PSD Air Quality Construction and Operating Permit Application, Enviva Pellets Sampson, Prepared by Trinity Consulting (Aug. 2014), § 4.4.3.5. (“RTO abatement technology is deemed to be cost prohibitive”); PSD Air Quality Construction and Operating Permit Application, Enviva Pellets Hamlet, Prepared by Trinity Consulting (Jan. 2015), § 4.4.3.5 (“RTO abatement technology is deemed to be cost prohibitive”).

<sup>94</sup> Melin, Staffan, Wood Pellet Association of Canada, Determination of Explosibility of Dust Layers in Pellet Manufacturing Plants (Aug. 30, 2012)(“Dust explosions and fires has become a major issue in the pellets industry as well as in other woodworking industries with devastating consequences in many cases.”); Biomass Handling, *Biomass Dust Fire and Explosion Control* (Apr. 24, 2013), at 2 (“Historically, wood pellet production was a small industry with more than its share of fires and explosions. However with the emphasis on green energy, wood pellet production has skyrocketed and very large plants are being constructed. There have been several recent major fires and explosions within the wood pellet manufacturing, shipping, receiving, storage and power plant facilities. These new facilities are learning that they have to employ safe handling practices for dry wood materials.”).

<sup>95</sup> “2 Burn Victims Remain Hospitalized after Hazlehurst Flash Fire,” WALB (June 4, 2015), <http://www.walb.com/story/28983516/4-seriously-burned-after-fire-at-hazlehurst-wood-pellets>; “Fire Reported at Highland Pellets Plant,” *The Pine Bluff Commercial* (Aug. 16, 2017), <http://www.pbcommercial.com/news/20170816/fire-reported-at-highland-pellets-plant>; “Enviva’s Cottondale Facility Damaged by Fire,” *mypanhandle.com*, (June 11, 2017), <http://www.mypanhandle.com/news/envivascottondale-facility-damaged-by-fire/737627383>; Voegelé, Erin. “Fire at Enviva Facility Not Expected to Result in Major Downtime.” *Biomass Magazine* (Jan. 9, 2014), <http://biomassmagazine.com/articles/9882/fire-at-enviva-facility-not-expected-to-result-in-major-downtime>; Bryant, Cal. “Enviva Fire Quickly Contained.” *Roanoke-Chowan News-Herald* (Jan. 24, 2013), <http://www.roanoke-chowannews-herald.com/2013/01/24/enviva-fire-quickly-contained/>; Taylor, Stephanie. “Aliceville Plant Closed After Explosion.” *Tuscaloosa News* (Oct. 24, 2016), <http://www.tuscaloosaneews.com/news/20161024/aliceville-plant-closed-after-explosion> Taylor, Stephanie. “Aliceville Plant Closed After Explosion.” *Tuscaloosa News* (Oct. 24, 2016), <http://www.tuscaloosaneews.com/news/20161024/aliceville-plant-closed-after-explosion>; “German Pellet Plant in Woodville has Fire in Silo.” *Beaumont Enterprise* (Apr. 30, 2014), <http://www.beaumontenterprise.com/jasper/news/article/German-pellet-Plant-in-Woodville-has-fire-in-Silo-5442052.php>; Waldrep, Emily. “Firefighters Respond to Second Fire at Woodville German Pellet Plant.” *Tyler County Booster* (May 07, 2015), <https://www.tylercountybooster.com/index.php/news/1848-firefighters-respond-to-second-fire-at-woodville-german-pellet-plant>; Langford, Cameron. “Residents Go to Court Over Months-Long Texas Plant Fire.” *Courthouse News* (Oct. 27, 2017), <https://www.courthousenews.com/residents-go-court-months-long-texas-plant-fire/>

<sup>96</sup> “2 Burn Victims Remain Hospitalized after Hazlehurst Flash Fire,” WALB, (June 4, 2015), <http://www.walb.com/story/28983516/4-seriously-burned-after-fire-at-hazlehurst-wood-pellets>.

<sup>97</sup> Taylor, Stephanie. “Aliceville Plant Closed After Explosion.” *Tuscaloosa News* (Oct, 2016), <http://www.tuscaloosaneews.com/news/20161024/aliceville-plant-closed-after-explosion>

<sup>98</sup> “Enviva’s Cottondale Facility Damaged by Fire,” *mypanhandle.com* (June 11, 2017), <http://www.mypanhandle.com/news/envivascottondale-facility-damaged-by-fire/737627383>; Voegelé, Erin. “Fire at Enviva Facility Not Expected to Result in Major Downtime.” *Biomass Magazine* (Jan. 9, 2014), <http://biomassmagazine.com/articles/9882/fire-at-enviva-facility-not-expected-to-result-in-major-downtime>; Bryant, Cal. “Enviva Fire Quickly Contained.” *Roanoke-Chowan News-Herald* (Jan. 24, 2013), <http://www.roanoke-chowannews-herald.com/2013/01/24/enviva-fire-quickly-contained/>; Hill, Brian. “Firefighters Battle Fire at Port of Chesapeake.” *WKTR.com* (Feb. 28, 2018), <http://wtkr.com/2018/02/28/firefighters-battle-blaze-at-port-of-chesapeake/>.

<sup>99</sup> “German Pellet Plant in Woodville has Fire in Silo.” *Beaumont Enterprise* (Apr. 30, 2014), <http://www.beaumontenterprise.com/jasper/news/article/German-pellet-Plant-in-Woodville-has-fire-in-Silo-5442052.php>; Waldrep, Emily. “Firefighters Respond to Second Fire at Woodville German Pellet Plant.” *Tyler County Booster* (May 07, 2015), <https://www.tylercountybooster.com/index.php/news/1848-firefighters-respond-to-second-fire-at-woodville-german-pellet-plant>; Langford, Cameron. “Residents Go to Court Over



---

Months-Long Texas Plant Fire.” *Courthouse News* (Oct. 27, 2017), <https://www.courthousenews.com/residents-go-court-months-long-texas-plant-fire/>.

<sup>100</sup> *Id.*

<sup>101</sup> Rogers, Scott, “OPFD Continues Investigation of Bayou Wood Product Fire,” *The News Star* (June 8, 2015), <http://www.thenewsstar.com/story/news/local/2015/06/08/opfd-continues-investigation-bayou-wood-products-fire/28683263/>.

<sup>102</sup> Stepzinski, Teresa, “Explosion Damages Waycross Plant; No Injuries Reported,” *jacksonville.com* (June 21, 2011), <http://www.jacksonville.com/news/crime/2011-06-21/story/explosion-damages-waycross-plant-no-injuries-reported>.

<sup>103</sup> “Fatal Sawdust Blast in B.C. Comes After Five Explosions at Similar Plants Since 2009,” *National Post* (Apr. 28, 2012), <http://nationalpost.com/news/canada/fatal-sawdust-blast-in-b-c-comes-after-five-explnsions-at-similar-plants-since-2009>

<sup>104</sup> Clean Air Act section 112(r)(1).

<sup>105</sup> Although the Clean Air Act does not define “extremely hazardous substances,” the legislative history provides criteria which EPA may use to determine if a substance is extremely hazardous. Specifically, the Senate Report states that “extremely hazardous substance” would include any agent “which may or may not be listed or otherwise identified by any Government agency which may as the result of short-term exposures associated with releases to the air cause death, injury or property damage due to its toxicity, reactivity, flammability, volatility, or corrosivity.” Senate Committee on Environment and Public Works, Clean Air Act Amendments of 1989, Senate Report No. 228, 101<sup>st</sup> Congress, 1<sup>st</sup> Session 211 (1989), at 211.

# **Georgia Department of Natural Resources**

**Environmental Protection Division • Air Protection Branch**

**4244 International Parkway • Suite 120 • Atlanta • Georgia 30354**

404/363-7000 • Fax: 404/363-7100

Judson H. Turner, Director

## **MEMORANDUM**

**DATE:** 1-29-2013

**TO:** Eric Cornwell- Stationary Source Permitting Manager

**FROM:** Manny Patel- VOC unit Manager

**SUBJECT:** Emission factors for Wood Pellet Manufacturing

### **BACKGROUND:**

We are seeing a lot of wood pellet manufacturing application being submitted to GAEPD. These applications are all using different emission factors. It is GAEPD's desire to provide standardized emission factors for applicant's to use in wood pellet manufacturing application. This will make the applications consistent and aide in faster review of these applications.

GAEPD has done extensive testing at Georgia Biomass and have come to conclusion that in addition to dryers there a significant amount of VOC emissions from Hammermill, Pellet Coolers and storage and handling from wood pellet manufacturing operations.

### **BASIS OF RECOMMENDATION:**

#### **1. VOC Emissions:**

##### **a. Dryers:**

It is our understanding that from the applications submitted to us that the operating temperatures of the dryer's used in pellet mill are very similar to that of particle board dryers. Additionally, the moisture content of the chips entering and exiting the pellet mill dryer and green particle board dryers are very similar. Hence, VOC emissions from the pellet mill dryers are same in amount and characteristics of particle board dryers.

This approach was further validated when we took VOC emissions test from Georgia Biomass (May 2012, Agri Products Thomasville, GA (March 22, 2010), Agri products Fitzgerald, GA(March 19 2009), Telfair Products, Lumber City GA(August 27,2009) and compared to that of particle board dryer emissions factors from AP-42 for green wood as shown in the attached Table. Based on the comparison of different VOC emission factors we concluded that the particleboard dryers VOC emission factors from AP-42 Chapter 10, Table 10.6.2-3(SCC 3-07-006-25) are a good representation for the wood pellet dryers.

##### **b. Hammermill, Pellet Cooler and Storage and Handling**

The VOC emission factors for Hammermill, Pellet Cooler and storage were taken from May 16, 2012 testing for Georgia Biomass. This is the only current data we have so we suggest using these until more test becomes available.

## **2. HAP and HCl Emissions:**

### **a. Dryers:**

The emission of Formaldehyde, Acetaldehyde and Methanol from Georgia Biomass test (May 16,2012) were compared to emissions from Particle board dryers from AP-42 Chapter 10, Table 10.6.2-3(SCC 3-07-006-25) and OSB dryes from AP-42 Chapter 10, Table 10.6.1-3(SCC3-07-010-09). All of these emission factors are almost identical to each other. Hence it is suggested that HAP emission factors for Particle board dryer from AP-42 Chapter 10, Table 10.6.2-3(SCC 3-07-006-25) be used for Formaldehdye, acetaldehyde and methanol and adjusted where deemed necessary for worst case emissions.

HCl emissions from AP-42 Chapter 1, Table 1.6-3 for wood residue combustion should be used for estimating HCl emissions from wood pellet dryers.

### **b. Hammermill, Pellet Cooler and Storage and Handling**

Georgia Biomass has performed HAP testing on the pellet cooler exhaust. We estimated the HAP emissions from the Hammermill and storage areas by taking the ratio of the VOC emissions from pellet cooler to hammer mill and storage areas and applied the same ratio to estimate HAP emissions.

## **3. NOX and CO and PM emissions:**

### **a. Dryers:**

Both NO<sub>x</sub> and CO are temperature dependent. OSB dryer operate at lower temperature and hence generate more CO and less NO<sub>x</sub>. While particle board dryers operate at higher temperature and hence generate less CO and more NO<sub>x</sub>. Hence, a worst case emission from both data sources is recommended for CO and NO<sub>x</sub>.

NO<sub>x</sub> emission factor from AP-42 Chapter 10 Table 10.6.2-2 for particleboard dryer (SCC3-07-007-08) should be used.

CO emission factor from AP-42 Chapter 10 Table 10.6.1-2 for OSB dryer (SCC3-07-0010-09) should be used.

### **b. PM Total and Condensible:**

PM total and condensible should be calculated by using AP-42 Chapter 6, Table 10.6.2-1 for Particle board dryer (SCC 3-07-006-25).

## GAEPD RECOMMENDED EMISSION FACTORS FOR WOOD PELLET MANUFACTURING

| Emission Source                                                   | Uncontrolled Emission Factor                   | Basis of Emission factor                                | Control Device                                                                                                                          |
|-------------------------------------------------------------------|------------------------------------------------|---------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
| Rotary Dryer<br>Direct wood fired<br>processing green<br>softwood | 6.0 lb/ODT for VOC                             | AP-42 Table 10.6.2-3<br>SCC 3-07-006-25 (Adjusted)      | If emissions are routed<br>to the dryer with<br>WESP/RTO controls<br>use 95% DRE<br>for VOC and HAP                                     |
|                                                                   | 5.3 lb/ODT for CO                              | AP-42 Table 10.6.1-2<br>SCC3-07-010-09                  |                                                                                                                                         |
|                                                                   | 2.7 lb/ODT for NOx                             | AP-42 Table 10.6.2-2<br>SCC 3-07-006-25                 |                                                                                                                                         |
|                                                                   | 2.2 lb/ODT for PM<br>total                     | AP-42 Table 10.6.2-1<br>SCC 3-07-006-25                 |                                                                                                                                         |
|                                                                   | 1.1 lb/ODT for PM<br>Condensable               | AP-42 Table 10.6.2-1<br>SCC 3-07-006-25                 |                                                                                                                                         |
|                                                                   | 0.11 lb/ODT for<br>Acetaldehyde                | AP-42 Table 10.6.2-3<br>SCC 3-07-006-25 (Adjusted)      |                                                                                                                                         |
|                                                                   | 0.14 lb/ODT for<br>Formaldehyde                | AP-42 Table 10.6.2-3<br>SCC 3-07-006-25                 | If WESP is used for<br>PM control use 70%<br>removal efficiency for<br>HCl (pH of the water<br>needs to be monitored<br>and maintained) |
|                                                                   | 0.11 lb/ODT ton for<br>Methanol                | AP-42 Table 10.6.2-3<br>SCC 3-07-006-25                 |                                                                                                                                         |
|                                                                   | 1.9 E-02 lb/MM Btu<br>for HCl                  | AP-42 Table 1.6-3                                       |                                                                                                                                         |
| Hammermill                                                        | 2.5 lb VOC/ton<br>product                      | Georgia Biomass Testing                                 | If emissions are routed<br>to dryer 90 % DRE for<br>VOC and HAP                                                                         |
|                                                                   | 0.004 lb/ton of product<br>for Acetaldehyde    | Georgia Biomass- prorated<br>from Pellet Cooler testing |                                                                                                                                         |
|                                                                   | 0.008 lb/ton of<br>product for<br>Formaldehyde | Georgia Biomass-prorated from<br>Pellet Cooler testing  | If emissions are routed<br>to RTO use 95 % DRE<br>for VOC and HAP.                                                                      |
|                                                                   | 0.004 lb/ton for<br>Methanol                   | Georgia Biomass-prorated from<br>Pellet Cooler testing  |                                                                                                                                         |

| Emission Source                                                  | Uncontrolled Emission Factor             | Basis of Emission factor                             | Control Device                                               |
|------------------------------------------------------------------|------------------------------------------|------------------------------------------------------|--------------------------------------------------------------|
| Pelletizer/Pellet Cooler (without Steam injection or extraction) | 0.5 lb VOC/ton of Product                | Georgia Biomass Testing                              | If emissions are routed to dryer 90 % DRE for VOC and HAP    |
|                                                                  | 0.001 lb/ton of product for Acetaldehyde | Georgia Biomass Testing                              |                                                              |
|                                                                  | 0.002 lb/ton of product for Formaldehyde | Georgia Biomass Testing                              | If emissions are routed to RTO use 95 % DRE for VOC and HAP. |
|                                                                  | 0.001 lb/ton of product for Methanol     | Georgia Biomass Testing                              |                                                              |
| Pelletizer/Pellet Cooler (with Steam injection)                  | 1.3 lb VOC/ton of product                | Georgia Biomass Testing                              | If emissions are routed to dryer 90 % DRE for VOC and HAP    |
|                                                                  | 0.002 lb/ton of product for Acetaldehyde | Georgia Biomass- prorated from Pellet Cooler testing |                                                              |
|                                                                  | 0.004 lb/ton of product for Formaldehyde | Georgia Biomass- prorated from Pellet Cooler testing | If emissions are routed to RTO use 95 % DRE for VOC and HAP. |
|                                                                  | 0.002 lb/ton of product for Methanol     | Georgia Biomass- prorated from Pellet Cooler testing |                                                              |
| Storage/Handling                                                 | 0.4 lb VOC/ton of product                | Georgia Biomass Testing                              | If emissions are routed to dryer 90 % DRE for VOC and HAP    |
|                                                                  | 0.001 lb/ton of product for Acetaldehyde | Georgia Biomass- prorated from Pellet Cooler testing |                                                              |
|                                                                  | 0.002 lb/ton of product for Formaldehyde | Georgia Biomass- prorated from Pellet Cooler testing | If emissions are routed to RTO use 95 % DRE for VOC and HAP  |
|                                                                  | 0.001 lb/ton of product for Methanol     | Georgia Biomass- prorated from Pellet Cooler testing |                                                              |

Note: These are GAEPD recommended emission factors. Use of these emission factors does not guarantee compliance with all state and federal regulations

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

JUN 13 1989

MEMORANDUM

SUBJECT: Guidance on Limiting Potential to Emit in New Source Permitting

FROM: Terrell E. Hunt  
Associate Enforcement Counsel  
Air Enforcement Division  
Office of Enforcement and Compliance Monitoring

John S. Seitz, Director  
Stationary Source Compliance Division  
Office of Air Quality Planning and Standards

TO: Addressees

This memorandum transmits the final guidance on conditions in construction permits which can legally limit a source's potential to emit to minor or de minimis levels. We received many helpful comments on the January 24, 1989 draft of this guidance, and have incorporated the comments into the final document wherever possible. A summary of the major changes which have been made to the guidance in response to these comments is provided below.

Several commenters noted that the draft guidance used the term "federally enforceable" to mean both federally enforceable as defined in the new source regulations (40 C.F.R. Sections 52.21(b) (17), 51.165(a) (1) (xiv), 51.166(b) (17)), and enforceable as a practical matter. We have tried to distinguish the places where each term should be used, explained the relationship between the two terms, and indicated that in order to properly restrict potential to emit, limitations must be both federally enforceable as defined in the regulations and practically enforceable.

Some commenters requested that the section on averaging times for production limits be more specific as to when it is appropriate to use limitations which exceed a one month time basis. We have tried to explain why it is not possible to develop generic criteria for making this distinction, and to indicate situations where exceptions to the policy that production and operation limitations not exceed one month may be warranted.

There were some requests for a section on enforcement. We have included a new Section VI which addresses this topic. We also received many good suggestions on the example permit limitations. The section on examples has been substantially reworked to reflect your comments.

Finally, we learned through the comments that in two specific circumstances, short term emission limits are the most useful and reasonable way to restrict and verify limits on potential to emit. These circumstances are: 1) when control equipment is installed but control equipment operating parameters are difficult to measure during enforcement inspections; and 2) in surface coating operations with numerous and unpredictable use of coatings containing varying VOC content, where add-on control equipment is not employed. Therefore, we have made a narrow exception to the flat prohibition on use of emission limits to restrict potential to emit for these specific circumstances, and only when certain additional conditions have been met.

Again, we appreciate the thoughtful comments we have received on this guidance. Please insert this document into your Clean Air Act Compliance/Enforcement Policy Compendium as Item Number H.3. If you have any questions, please contact Judith Katz in the Air Enforcement Division at FTS 382-2843, or Sally Farrell in the Stationary Source Compliance Division at FTS 382-2875.

Addressees:

Regional Counsels  
Regions I-X

Regional Counsel Air Branch Chiefs  
Regions I-X

Air Management Division Directors  
Regions I, III, and IX

Air and Waste Management Division Director  
Region II

Air, Pesticides, and Toxics Management Division Directors  
Regions IV and VI

Air and Radiation Division Director  
Region V

Air and Toxics Division Directors  
Regions VII, VIII and X

Air Compliance Branch Chiefs  
Regions I-X

New Source Review Contacts  
Regions I-X

Alan Eckert  
Associate General Counsel

Greg Foote, OGC  
Gary McCutchen, NSRS, AQMD  
David Solomon, NSRS, AQMD  
Sally Farrell, SSCD  
Judy Katz, AED

David Buente, Chief

Environmental Enforcement Section

DOJ



LIMITING POTENTIAL TO EMIT IN NEW SOURCE PERMITTING

JUNE 13, 1989

AIR ENFORCEMENT DIVISION  
OFFICE OF ENFORCEMENT AND COMPLIANCE MONITORING

STATIONARY SOURCE COMPLIANCE DIVISION  
OFFICE OF AIR QUALITY PLANNING AND STANDARDS

## Limiting Potential to Emit in New Source Permitting

- I. Introduction
- II. The Louisiana-Pacific Case
- III. Types of Limitations that will Limit Potential to Emit
- IV. Time Periods for Limiting Production and Operation
- V. Sham Operational Limits
  - A. Permits with conditions that do not reflect a source's planned mode of operation are void ab initio and cannot act to shield the source from the requirement to undergo preconstruction review.
    - 1. Sham permits are not allowed by 40 CFR 52.21(r) (4)
    - 2. Sham permits are not allowed by the definition of potential to emit: 40 CFR 52.21(b) (4), 51.165(a) (1) (iii), 51.166(b) (4)
    - 3. Sham permits are not allowed by the Clean Air Act
  - B. Guidelines for determining when minor source construction permits are shams.
    - 1. Filing a PSD or nonattainment NSR application
    - 2. Applications for funding
    - 3. Reports on consumer demand and projected productions levels
    - 4. Statements of authorized representatives of the source regarding plans for operation
- VI. Enforcement Procedures
- VII. Examples
- VIII. Conclusion

## Limiting Potential to Emit in New Source Permitting

### I. Introduction

Whether a new source or modification is major and subject to new source review under Parts C and D of the Clean Air Act is dependent on whether that source or modification has or will have the potential to emit major or significant amounts of a regulated pollutant. Therefore, the definition of "potential to emit" under the new source regulations is extremely important in determining the applicability of new source review to a particular source. The federal regulations define "potential to emit" as:

the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of fuel combusted, stored or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is federally enforceable.

40 C.F.R Sections 52.21(b) (4), 51.165(a) (1) (iii), 51.166(b) (4).

Permit limitations are very significant in determining whether a source is subject to major new source review. This is because they are the easiest and most common way for a source to obtain restrictions on its potential to emit. A permit does not

have to be a major source permit to legally restrict potential emissions. A minor source construction permit issued pursuant to a state program approved by EPA as meeting the requirements of 40 C.F.R. Section 51.160 is federally enforceable. In fact, any permit limitation can legally restrict potential to emit if it meets two criteria: 1) it is federally enforceable as defined by 40 C.F.R. Sections 52.21(b) (17), 51.165(a) (1) (xiv), 51.166(b) (17), i.e., contained in a permit issued pursuant to an EPA-approved permitting program or a permit directly issued by EPA, or has been submitted to EPA as a revision to a State Implementation Plan and approved as such by EPA; and 2) it is enforceable as a practical matter. The second criterion is an implied requirement of the first criterion. A permit requirement may purport to be federally enforceable, but, in reality cannot be federally enforceable if it cannot be enforced as a practical matter.

Non-permit limitations can also legally restrict potential to emit. These limitations include New Source Performance Standards codified at 40 C.F.R. Part 60 and National Emission Standards for Hazardous Air Pollutants codified at 40 C.F.R. Part 61.

The appropriate means of restricting potential to emit through permit conditions has been an issue in recent enforcement cases. Through these cases and through guidance issued by EPA, the Agency has addressed three questions: what types of permit

limitations can legally limit potential to emit; whether long averaging times for production limitations are enforceable as a practical matter; and whether sources may limit potential to emit to minor source levels as a means of circumventing the preconstruction review requirements of major source review.

## II. The Louisiana-Pacific Case

In United States v. Louisiana-Pacific Corporation, 682 F. Supp. 1122 (D. Colo. Oct. 30, 1987) and 682 F. Supp. 1141 (D. Colo. March 22, 1988), Judge Alfred Arraj discussed the type of permit restrictions which can be used to limit a source's potential to emit. The Judge concluded that:

... not all federally enforceable restrictions are properly considered in the calculation of a source's potential to emit. While restrictions on hours of operation and on the amount of materials combusted or produced are properly included, blanket restrictions on actual emissions are not.

682 F. Supp. at 1133.

The Court held that Louisiana-Pacific's permit conditions which limited carbon monoxide emissions to 78 tons per year and volatile organic compounds to 101.5 tons per year should not be considered in determining "potential to emit" because these blanket emission limits did not reflect the type of permit conditions which restricted operations or production such as limits on hours of operation, fuel consumption, or final product.

The Louisiana-Pacific court was guided in its reasoning by the D.C. Circuit's holding in Alabama Power v. Costle, 636 F. 2d 323 (D.C. Circuit 1979). Before Alabama Power, EPA regulations required potential to emit to be calculated according to a source's maximum uncontrolled emissions. In Alabama Power, the D. C. Circuit remanded those regulations to EPA with instructions that the Agency include the effect of in-place control equipment in defining potential to emit. EPA went beyond the minimum dictates of the D.C. Circuit in promulgating revised regulations in 1980 to include, in addition to control equipment, any federally enforceable physical or operational limitation. The Louisiana-Pacific court found that blanket limits on emissions did not fit within the concept of proper restrictions on potential to emit as set forth by Alabama Power.

Moreover, Judge Arraj found that:

...a fundamental distinction can be drawn between the federally enforceable limitations which are expressly included in the definition of potential to emit and (emission) limitations.... Restrictions on hours of operation or on the amount of material which may be combusted or produced ... are, relatively speaking, much easier to "federally enforce." Compliance with such conditions could be easily verified through the testimony of officers, all manner of internal correspondence and accounting, purchasing and production records. In contrast, compliance with blanket restrictions on actual emissions would be virtually impossible to verify or enforce.

Id. Thus, Judge Arraj found that blanket emission limits were not enforceable as a practical matter.

Finally, the Court reasoned that allowing blanket emission limitation to restrict potential to emit would violate the intent of Congress in establishing the Prevention of Significant Deterioration (PSD) program.

### III. Types of Limitations that will Restrict Potential to Emit

As an initial matter in this discussion, a few important terms should be defined. Emission limits are restrictions over a given period of time on the amount of a pollutant which may be emitted from a source into the outside air. Production limits are restrictions on the amount of final product which can be manufactured or otherwise produced at a source. Operational limits are all other restrictions on the manner in which a source is run, including hours of operation, amount of raw material consumed, fuel combusted, or conditions which specify that the source must install and maintain add-on controls that operate at a specified emission rate or efficiency. All production and operational limits except for hours of operation are limits on a source's capacity utilization. Potential emissions are defined as the product of a source's emission rate at maximum operating capacity, capacity utilization, and hours of operation.

To appropriately limit potential to emit consistent with the opinion in Louisiana-Pacific, all permits issued pursuant to 40 C.F.R. Sections 51.160, 51.166, 52.21 and 51.165 must contain a

production or operational limitation in addition to the emission limitation in cases where the emission limitation does not reflect the maximum emissions of the source operating at full design capacity without pollution control equipment. Restrictions on production or operation that will limit potential to emit include limitations on quantities of raw materials consumed, fuel combusted, hours of operation, or conditions which specify that the source must install and maintain controls that reduce emissions to a specified emission rate or to a specified efficiency level. Production and operational limits must be stated as conditions that can be enforced independently of one another. For example, restrictions on fuel which relates to both type and amount of fuel combusted should state each as an independent condition in the permit. This is necessary for purposes of practical enforcement so that, if one of the conditions is found to be difficult to monitor for any reason, the other may still be enforced.

When permits contain production or operational limits, they should also have recordkeeping requirements that allow a permitting agency to verify a source's compliance with its limits. For example, permits with limits on hours of operation or amount of final product should require an operating log to be kept in which the hours of operation and the amount of final product produced are recorded. These logs should be available



for inspection should staff of a permitting agency wish to check a source's compliance with the terms of its permit.

When permits require add-on controls operated at a specified efficiency level, permit writers should include, so that the operating efficiency condition is enforceable as a practical matter, those operating parameters and assumptions which the permitting agency depended upon to determine that the control equipment would have a given efficiency.

An emission limitation alone would limit potential to emit only when it reflects the absolute maximum that the source could emit without controls or other operational restrictions. When a permit contains no limits on capacity utilization or hours of operation, the potential to emit calculation should assume operation at maximum design or achievable capacity (whichever is higher) and continuous operation (8760 hours per year).

The particular circumstances of some individual sources make it difficult to state operating parameters for control equipment limits in a manner that is easily enforceable as a practical matter. Therefore, there are two exceptions to the absolute prohibition on using blanket emission limits to restrict potential to emit. If the permitting agency determines that setting operating parameters for control equipment is infeasible in a particular situation, a federally enforceable permit

containing short term emission limits (e.g. lbs per hour) would be sufficient to limit potential to emit, provided that such limits reflect the operation of the control equipment, and the permit includes requirements to install, maintain, and operate a continuous emission monitoring (CEM) system and to retain CEM data, and specifies that CEM data may be used to determine compliance with the emission limit.

Likewise, for volatile organic compound (VOC) surface coating operations where no add-on control is employed but emissions are restricted through limiting VOC contents and quantities of coatings used, emission limits may be used to restrict potential to emit under the following limited circumstances. If the permitting agency determines for a particular surface coating operation that operating and production parameters (e.g. gallons of coating, quantities produced) are not readily limited due to the wide variety of coatings and products and due to the unpredictable nature of the operation, emission limits coupled with a requirement to calculate daily emissions may be used to restrict potential to emit. The source must be required to keep the records necessary for this calculation, including daily quantities and the VOC content of each coating used. Emission limits may be used in this limited circumstance to restrict potential to emit since, in this case, emission limits are more easily enforceable than operating or production limits.

#### IV. Time Periods For Limiting Production and Operation

As discussed above, a limitation specifically recognized by the regulations as reducing potential to emit is a limitation on production or operation. However, for these limitations to be enforceable as a practical matter, the time over which they extend should be as short term as possible and should generally not exceed one month. This policy was explained in a March 13, 1987 memorandum from John Seitz to Bruce Miller, Region IV. The requirement for a monthly limit prevents the enforcing agency from having to wait for long periods of time to establish a continuing violation before initiating an enforcement action.

EPA recognizes that in some rare situations, it is not reasonable to hold a source to a one month limit. In these cases, a limit spanning a longer time is appropriate if it is a rolling limit. However, the limit should not exceed an annual limit rolled on a monthly basis. EPA cannot now set out all inclusive categories of sources where a production limit longer than a month will be acceptable because every situation that may arise in the future cannot now be anticipated. However, permits where longer rolling limits are used to restrict production should be issued only to sources with substantial and unpredictable annual variation in production, such as emergency

boilers. Rolling limits could be used as well for sources which shut down or curtail operation during part of a year on a regular seasonal cycle, but the permitting authority should first explore the possibility of imposing a month-by-month limit. For example, if a pulp drier is periodically shut down from December to April, the permit could contain a zero hours of operation limit for each of those months, and then the appropriate hourly operation limit for each of the remaining months. Under no circumstances would a production or operation limit expressed on a calendar year annual basis be considered capable of legally restricting potential to emit.

#### V. Sham Operational Limits

In the past year, several sources have obtained purportedly federally enforceable permits with operating restrictions limiting their potential to emit to minor or de minimis levels for the purpose of allowing them to commence construction prior to receipt of a major source permit. In such cases where EPA can demonstrate an intent to operate the source at major source levels, EPA considers the minor source construction permit void ab initio and will take appropriate enforcement action to prevent the source from constructing or operating without a major source permit.

The following example illustrates the kind of situation addressed in this section: An existing major stationary source proposes to add a 12.5 megawatt electric utility steam generating unit, and applies for a federally enforceable minor source permit which restricts operation at the unit to 240 hours per year. Because the project is designed as a baseload facility, EPA does not believe that the source intends to operate the facility for only 240 hours a year. Further investigation would probably uncover documentation of the source's intent to operate at higher levels than those for which it is permitted.

This situation raises the question of whether a source can lawfully bypass the preconstruction or premodification review requirements of Prevention of Significant Deterioration (PSD) and nonattainment New Source Review by committing to permit conditions which restrict production to a level at which the source does not intend to operate for any extensive time. If, after constructing and commencing operation, the source obtains a relaxation of its original permit conditions prior to exceeding them, does this constitute a violation of the preconstruction review requirements? This section discusses why it is improper to construct a source with a minor source permit when there is intent to operate as a major source, and provides guidelines for identifying these "sham" permits.

A. Permits with conditions that do not reflect a source's planned mode of operation are void ab initio and cannot act to shield the source from the requirement to undergo preconstruction review.

1. Sham permits are not allowed by 40 CFR Section 52.21(r) (4) Section

52.21(r) (4) states:

At such time that a particular source or modification becomes a major stationary source or major modification solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980 on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then (PSD) shall apply to the source or modification as though construction had not yet commenced on the source or modification.

When a source that is minor because of operating restrictions in a construction permit later applies for a relaxation of that construction permit which would make the source major, Section 52.21(r) (4) prescribes the methodology for determining best available control technology (BACT). However, it does not foreclose EPA's ability, in addition to the retroactive application of BACT and other requirements of the PSD program, to pursue enforcement where the Agency believes that the initial minor source permit was a sham. EPA will limit its activity to requiring application of 40 CFR 52.21(r) (4) only for the cases where a source legitimately changes a project after finding that the operating restrictions which were taken in good faith cannot be complied with. Whether a source has acted in good faith is a factual question which is answered by available evidence in the particular case.

2. Sham permits are not allowed by the definition of potential to emit:

40 C.F.R. Sections 52.21(b) (4), 51.165(a) (1) (iii), 51.166(b) (4).

The definition of potential to emit enables sources to obtain federally enforceable permits with operational restrictions as a means of limiting emissions to minor source levels. However, implicit in the application of these limitations is the understanding that they comport with the true design and intended operation of the project.

3. Sham permits are not allowed by the Clean Air Act

Parts C and D of the Clean Air Act exhibit Congress's clear intent that new major sources of air pollution be subject to preconstruction review. The purposes for these programs cannot be served without this essential element. Therefore, attempts to expedite construction by securing minor source status through the receipt of operational restrictions from which the source intends to free itself shortly after operation are to be treated as circumvention of the preconstruction review requirements.

B. Guidelines for determining when minor source construction permits are shams.

EPA's determination that a purportedly federally enforceable construction permit is a sham is made based on an evaluation of specific facts and evidence in each individual case. The following are criteria which should be scrutinized when making such a determination:

1. Filing a PSD or nonattainment NSR permit application

If a major source or major modification permit application is filed simultaneously with or at approximately the same time as the minor source construction permit, this is strong evidence of an intent to circumvent the requirements of preconstruction review. Even a major source application filed after the minor source application, but either before operation has commenced or after less than a year of operation should be looked at closely.

2. Applications for funding

Applications for commercial loans or, for public utilities, bond issues, should be scrutinized to see if the source has guaranteed a certain level of operation which is higher than that in its construction permit. If the project would not be funded or if it would not be economically viable if operated on an extended basis



(at least a year) at the permitted level of production, this should be considered as evidence of circumvention.

3. Reports on consumer demand and projected production levels.

Stockholder reports, reports to the Securities and Exchange Commission, utility board reports, or business permit applications should be reviewed for projected operation or production levels. If reported levels are necessary to meet projected consumer demand but are higher than permitted levels, this is additional evidence of circumvention.

4. Statements of authorized representatives of the source regarding plans for operation.

Statements by representatives of the source to EPA or to state or local permitting agencies about the source's plans for operation can be evidence to show intent to circumvent preconstruction review requirements.

Note that if a determination is made that a permit is a "sham" for one pollutant and, therefore, the source is a major source or major modification, the permit may possibly still contain valid limits on potential to emit for other pollutants.

In such cases, the entire source must still go through new source review, during which, for PSD review, all pollutants for which there is a net significant increase must be analyzed for BACT. In nonattainment new source review, new sources must have LAER determinations only for pollutants for which they are major. Major modifications, however, must have LAER determinations for all nonattainment pollutants emitted in significant amounts. If the valid limits in a partially void minor source construction permit keep certain pollutants below significance levels, then those pollutants would not have to be analyzed for BACT or LAER. However, if a source or modification is determined to be major for PSD or NSR because part of its minor permit is deemed void, it would have to undergo BACT or LAER analysis for all significant pollutants.

## VI. Enforcement Procedures

This guidance has discussed permit conditions which will legally restrict potential to emit, shielding a source from the requirement to comply with major new source permitting regulation. Failure by a permitting agency to adhere to these guidelines may result in a permit that does not legally restrict potential to emit, thereby subjecting a source to major new source review. If that source has not gone through preconstruction review, it is a significant violator of the Clean Air Act and is subject to enforcement for constructing or

modifying without a major new source permit.

The enforcement options available to EPA in these situations include administrative action under Sections 167 or 113 (a) (5) of the Act or federal judicial action under Sections 113 (b) (2), 113 (b) (5), 113(c), or 167. Which enforcement option is selected depends on the facts of the particular situation. (See July 15, 1988 guidance on EPA Procedures for Addressing Deficient New Source Permits.)

## VII. Examples

The following examples are provided to illustrate the type of permit restrictions which would and would not legally limit potential to emit to less than major source thresholds. These examples are provided for purposes of clarifying the potential to emit and averaging time guidance only. They are not intended to reflect all the permit conditions necessary for a valid permit. Specific test methods, compliance monitoring and recordkeeping and reporting requirements are necessary to make permit limitations enforceable as a practical matter. The use of examples where averaging times are the longest times allowed under EPA policies is not intended to necessarily condone the selection of the longest averaging times; averaging times should in practice be as short as possible.

1. The minor source construction permit for a boiler contains the following restrictions:  
250,000 gal fuel/month; 0.8% S fuel; 8000 hours/year.

These conditions are federally enforceable production and operation limits, but do not limit potential to emit because one of them does not meet EPA policies on enforceability as a practical matter. The averaging time for hours of operation, one of the operational limits necessary to restrict emissions to less than 250 tpy, exceeds a monthly or rolling yearly limit. If, instead of 8000 hours/year, the hourly restriction were stated as 666 hours/month, the permit would serve to keep the source a minor source, assuming the permit contains appropriate recordkeeping provisions.

2. A waferboard plant which has the physical capacity to emit over 300 tpy of carbon monoxide in the absence of using specific combustion techniques has the following permit restriction as the sole emission limitation: 249 tpy.

This does not limit potential to emit since an operational or production restriction is necessary for the source to be restricted to 249 tpy. The permit must contain a restriction on hours of operation or capacity utilization which, when multiplied by the maximum emission rate for the CO sources at the plant, results in emissions of 249 tpy. Additionally, while the

emission limit alone cannot restrict potential to emit, the emission limit is unenforceable as a practical matter since it is limited on an annual basis. The permit should contain a short term emission limit (in addition to the annual emission limit), consistent with the compliance period or parameter in the applicable test method for determining compliance.

3. A small scale rock crushing plant that cannot emit more than 240 tpy under maximum operation without controls (including plant-wide particulate emissions from transfer and storage operations) has the following permit restriction as the sole emission limitation: 240 tpy particulate matter.

Since no operational limitations are necessary for the source to emit below 250 tpy, no operational restrictions need be in the permit to limit potential to emit. However, although this is not a major source, the state agency should express the emission limit in this permit as a lb/hour measure or gr/dscf so that it will be enforceable as a practical matter.

4. A plant consisting solely of a small rock crusher has the following permit restrictions: 0.05 lb gr PM/dscf; fabric filter must be employed and maintained at 99% efficiency.

Assuming that maintaining the fabric filter at 99% efficiency will result in emissions of less than 250 tpy, this permit would limit

potential to emit if it also contained either 1) parameters that allowed the permitting agency to verify the fabric filter's operating efficiency or 2) a requirement to install and operate continuous opacity monitors (COMs) and a specification that COM data may be used to verify compliance with emission limits. Note that if this second alternative were adopted, it would not be necessary to require that the fabric filter be maintained at 99% efficiency.

To determine potential to emit, the efficiency rate of the fabric filter would be multiplied by the maximum uncontrolled emission rate, the maximum number of operating hours and maximum throughput capacity since there are no other operating or production limits. However, the efficiency rate of the fabric filter would not be enforceable as a practical matter unless there were an enforceable means to monitor ESP performance on a short term basis. The two alternatives mentioned above would satisfy this requirement.

5. A surface coating operation has the capability of utilizing 15,000 gal coating/month, with the following permit restrictions: 3.0 lb VOC/gal coating minus water; 20.5 tons VOC/month; monthly VOC emissions to be determined from records of the daily volumes of coatings used times the manufacturers specified VOC content.

This does not limit potential to emit since the source has the physical capacity to exceed 250 tpy of VOC, and the permit does not contain a production or an operational limitation. A monthly limit on gallons of coating used which when multiplied by 3.0 lb/gal equates to less than the 250 tpy threshold (13,500 gallons/month), with appropriate recordkeeping, would generally be necessary to limit potential to emit. If, however, the permitting agency determines, due to the wide variety of coatings employed and products produced, that restrictions on operation or production are not practically enforceable, then the above emission limits could restrict potential to emit if there are requirements that the source calculate emissions daily, and keep the appropriate records.

If the source was alternatively to meet the 20.5 ton/month limit by employing add-on controls, the permit would need to contain an operational limit, such as the requirement to install and operate an incinerator at 99% efficiency. A requirement to monitor incinerator efficiency (either directly or indirectly via temperature monitoring for example), and appropriate recordkeeping requirements to verify compliance with each of the permit conditions would also be necessary to make the permit conditions enforceable as a practical matter. Note, however, that in the case where add-on controls are employed, the source may be able to meet a shorter term emission limit than the ton per month figure.

## VIII. Conclusion

We hope this guidance will help EPA Regions identify sources which have the potential to emit major amounts of an air pollutant which will subject those sources to the requirements of preconstruction new source review. Every source which is subject to these requirements but has not obtained a major new source permit should be seriously considered for enforcement action.



Facility Name: **Hazlehurst Wood Pellets, LLC**

City: Hazlehurst

County: Jeff Davis

AIRS #: 04-13-16100023

Application #: TV-352816

Date SIP Application Received: n/a

Date Title V Application Received: May 6, 2019

Permit No: 2499-161-0023-V-02-4

| Program                    | Review Engineers | Review Managers |
|----------------------------|------------------|-----------------|
| SSPP                       | S. Ganapathy     | Ginger Payment  |
| SSCP                       | n/a              | n/a             |
| ISMU                       | n/a              | n/a             |
| TOXICS                     | n/a              | n/a             |
| Permitting Program Manager |                  | Eric Cornwell   |

## Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public comment period and EPA review process will be described in an addendum to this narrative.

**I. Facility Description****A. Existing Permits**

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments.

Table 1: Current Title V Permit and Amendments

| <b>Permit/Amendment Number</b> | <b>Date of Issuance</b> | <b>Description</b>                                                                                                                                                               |
|--------------------------------|-------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2499-161-0023-V-02-0           | 8/18 2015               | Initial Title V Permit                                                                                                                                                           |
| 2499-161-0023-V-02-1           | 5/25/2016               | 502(b)(10) change wood-fired burner replacement                                                                                                                                  |
| 2499-161-0023-V-02-2           | 7/6/2016                | Sig Mod without construction – removal of fuel oil firing in burners and remove pressure drop monitors in exhaust recycle duct from hammermills, pellet press and pellet coolers |
| 2499-161-0023-V-02-3           | 11/15/2017              | 502(b)(10) change – addition of a baghouse parallel to existing baghouse in each production line                                                                                 |

**B. Regulatory Status****1. PSD/NSR/RACT**

The facility is synthetic minor under PSD/NSR regulations for CO, NO<sub>x</sub> and VOC. Emissions of CO, VOC and NO<sub>x</sub> are limited to 249 tons/year in order to avoid going through a New Source Review under the PSD rules. The facility will continue to be a PSD SM source for CO, NO<sub>x</sub> and VOC after the proposed modifications. This permit amendment also limits PM emissions to less than 250 tpy as a matter of precaution.

## 2. Title V Major Source Status by Pollutant

**Table 2: Title V Major Source Status**

| Pollutant         | Is the Pollutant Emitted? | If emitted, what is the facility's Title V status for the Pollutant? |                                   |                         |
|-------------------|---------------------------|----------------------------------------------------------------------|-----------------------------------|-------------------------|
|                   |                           | Major Source Status                                                  | Major Source Requesting SM Status | Non-Major Source Status |
| PM                | yes                       | ✓                                                                    |                                   |                         |
| PM <sub>10</sub>  | yes                       | ✓                                                                    |                                   |                         |
| PM <sub>2.5</sub> | yes                       | ✓                                                                    |                                   |                         |
| SO <sub>2</sub>   | yes                       |                                                                      |                                   | ✓                       |
| VOC               | yes                       | ✓                                                                    |                                   |                         |
| NO <sub>x</sub>   | yes                       | ✓                                                                    |                                   |                         |
| CO                | yes                       | ✓                                                                    |                                   |                         |
| Individual HAP    | yes                       |                                                                      |                                   | ✓                       |
| Total HAPs        | yes                       |                                                                      |                                   | ✓                       |

**II. Proposed Modification****A. Description of Modification**

The Permittee proposes to construct and operate one new furnace, one new dryer, one new chipper, 2 green hammermills, 7 dry hammermills, and 3 pellet lines with a total of 15 presses and 3 coolers. Some of the equipment will be new, some existing. The new wood-fired furnace will be rated at a nominal, approximate 200 MMBTU/hour. Particulate (PM) emissions from the furnace and dryer will be controlled with a wet electrostatic precipitator (WESP). PM emissions from the dry hammermills will be controlled by cyclofilters. PM emissions from the presses and coolers will be controlled by baghouses. Volatile organic compound (VOC) and organic hazardous air pollutant (HAP) emissions from the furnace and dryer will be controlled with a Regenerative Thermal Oxidizer (RTO). VOC and HAP emissions from the dry hammermills, presses, and coolers will be controlled with a Regenerative Catalytic Oxidizer (RCO). The RTO and RCO will each have a gas-fired burner rated at 6 MMBTU/hour. The new dryer has a capacity of 78 oven dried tons per hour, and an annual throughput capacity of 675,000 oven dried tons (ODT). ODT = weight of wood in short tons at 11% moisture, calculated.

No pre-dried wood product will be brought from off-site; all wood will be routed through the dryer through the pellet-forming equipment.

Because of the significant changes to the plant, and to the permit requirements, all Conditions in the existing permit and its amendments (in Sections 2-6) are deleted and completely replaced by the conditions in Amendment 2.

**B. Emissions Change**

After the proposed change emissions of PM, PM<sub>10</sub>, PM<sub>2.5</sub> are expected to be lower for the furnace/dryer, dry hammermills, pellet press and pellet coolers due to WESP (dryer control) and baghouses for the downstream units. The regenerative thermal oxidizer and catalytic oxidizer (RTO and RCO) will result in more than 95% reduction of VOC and HAPs emissions from the furnace/dryer, dry hammermills, pellet press and pellet coolers. Due to the proposed PM, VOC and HAPs controls, the facility will be able to increase production from the dryers, hammermills, pellet presses and pellet coolers without becoming a PSD major source.

**Development of emission factors**Dryer DRY RTO

VOC: GA EPD default emission factor of 6lb/ODT x 95% DRE

HAP: GA EPD default emission factors for acetaldehyde, formaldehyde, and methanol x 95% DRE; other HAP emission factor from Appling County Pellets testing x 95% DRE.

NOx: Applicant provided emission factor of .25 lb/mmbtu x 200 mmbtu/hr 8760 (219 tpy) 219 tpy divided by production limit of 675,000 ODT/yr = 0.65 lb/ODT- then a slight buffer is added yielding 0.66 lb/ODT. This EF compares conservatively to the results from a similar sized dryer with RTO controls at GA Biomass – the latest NOx test there yields an EF of 0.38 lb/ODT

CO: Applicant provided emission factor of .25 lb/mmbtu x 200 mmbtu/hr 8760 (219 tpy) 219 tpy divided by production limit of 675,000 ODT/yr = 0.65 lb/ODT- then a slight buffer is added yielding 0.66 lb/ODT. This EF compares conservatively to the results from a similar sized dryer with RTO controls at GA Biomass – the latest CO test there yields an EF of 0.07 lb/ODT

PM: Applicant provided emission factor of .015 gr/cf exhaust airflow x airflow x 8760 = 98 tpy 98 tpy divided by production limit of 675,000 ODT/yr = 0.29 lb/ODT- then a slight buffer is added yielding 0.30 lb/ODT. This EF compares conservatively to the results from a similar sized dryer with RTO controls at GA Biomass – the latest CO test there yields an EF of 0.05 lb/ODT

Hammermill/Pellet Presses/Cooler RCO

VOC: GA EPD default emission factors of 2.5 lb/ ton (hammermills) + 1.3 lb/ton (steam injected pelletmills/coolers) x 95% DRE

HAP: GA EPD default emission factors for acetaldehyde, formaldehyde, and methanol x 95% DRE;

NOx: Applicant provided AP-42 fuel burning emission factor of .1 lb/mmbtu x 6 mmbtu/hr 8760 (2.6 tpy) 2.6 tpy divided by production limit of 675,000 ODT/yr = 0.008lb/ODT- then a large buffer is added to account for btu from voc-laden exhaust burned yielding 0.06 lb/ODT.

CO: Applicant provided AP-42 emission factor of .084 lb/mmbtu x 6 mmbtu/hr 8760 (2.2 tpy) 2.2 tpy divided by production limit of 650,000 ODT/yr = 0.007 lb/ODT- then a large buffer is added yielding 0.06 lb/ODT.

PM: Applicant provided emission factor of .015 gr/cf exhaust airflow x airflow x 8760 = 98 tpy

98 tpy divided by production limit of 650,000 ODT/yr = 0.30 lb/ODT- then a slight buffer is added yielding 0.31 lb/ODT.

#### HAND silos

VOC: GA EPD default factor is 0.4 lb/ODT; the applicant argues that the default factor is based on a test configuration at GA Biomass that handled uncooled pellets, yielding a higher than normal emission factor. GA EPD will allow a factor of ½ the default factor (0.2 lb/ODT); the permittee will be required to test to determine the validity of the factor and use the higher of the factor or the test result.

PM: GA EPD estimates a conservative value of 18 tons per year from the storage silos in the handling group HAND

HAP: GA EPD default emission factors for acetaldehyde, formaldehyde, and methanol

Emissions from the woodyard (Unit ID WOOD), including chip piles, and chipper are estimated using the Applicant's estimates, however these emissions are fugitive in nature and not accounted toward PSD applicability because the pellet plant is not one of the "list of 28" in 40 CFR 52.21.

#### Emission Factors

|                  | VOC EF         | meoh ef      | hcoh ef      | acet ef      | Other hap ef | PM EF          | NOX EF         | CO EF          | Production (per year) |
|------------------|----------------|--------------|--------------|--------------|--------------|----------------|----------------|----------------|-----------------------|
| RTO              | 0.300          | 0.006        | 0.007        | 0.006        | 0.010        | 0.300          | 0.660          | 0.660          | 675000 ODT            |
| RCO              | 0.190          | 0.001        | 0.001        | 0.001        | 0.000        | 0.310          | 0.060          | 0.060          | 650000 tons           |
| HAND             | 0.200          | 0.001        | 0.002        | 0.001        | 0.000        |                |                |                | 650000 tons           |
| Annual Emissions |                |              |              |              |              |                |                |                |                       |
|                  | voc            | meoh         | hcoh         | acet         | Other hap    | PM             | Nox            | CO             | total HAP             |
| RTO              | 101.250        | 2.025        | 2.363        | 2.025        | 3.375        | 101.250        | 222.750        | 222.750        | 9.788                 |
| RCO              | 61.750         | 0.163        | 0.325        | 0.163        | 0.000        | 100.750        | 19.500         | 19.500         | 0.650                 |
| HAND             | 65.000         | 0.325        | 0.650        | 0.325        | 0.000        | 0.000          | 0.000          | 0.000          | 1.300                 |
| <b>Total</b>     | <b>228.000</b> | <b>2.513</b> | <b>3.338</b> | <b>2.513</b> | <b>3.375</b> | <b>202.000</b> | <b>242.250</b> | <b>242.250</b> | <b>11.738</b>         |

Emission factors are in lb/actual ton. For the dryer RTO, this is measured as ODT, for other downstream equipment it is measured as actual tons. The production rate listed in the above table for the RCO-controlled equipment is the production weight existing the dry hammermills.

The moisture content of the wood exiting the dryer ("oven dried") is typically 11% . As the wood is further processed, the moisture content continues to decrease slightly. For example, the estimated moisture content of the wood fibers after the hammermills is 8%, and the moisture content of the pellets exiting the coolers is 4%. Converting 675,000 ODT to actual tons existing the cooler is:

Actual tons at 8% moisture =  $675,000 \times (1-11\%) / (1-8\%) = 653,000$  tons  
 Actual tons at 4% moisture =  $675,000 \times (1-11\%) / (1-4\%) = 625,800$  tons.

C. PSD/NSR Applicability

Currently the facility is a PSD minor source for VOC, CO, NO<sub>x</sub> and PM. The facility will continue to be a PSD minor source after the proposed modification since potential emissions of all PSD pollutant will be less than 250 tons per year.

### **III. Facility Wide Requirements**

All existing Conditions in Section 2 are deleted and replaced with conditions limiting HAP below 10/25 to avoid 112(g), limiting PM, VOC, NO<sub>x</sub>, and CO below 250 tons per year to avoid PSD major source status, and a dryer production limit of 675,000 ODT/yr to further bolster the PSD avoidance limits. It should be noted that production limit may be changed in the future via a permit action if the Division determines that the operations at the plant have lower emission factors than those currently established in this permit. These facility-wide emission limits are made enforceable by tracking production throughput in both the dryer and the pelletizing process, and using emission factors to calculate emissions.

The applicant submitted a Toxic Impact Assessment following Georgia's 2017 Toxic Guidelines. The compounds evaluated were formaldehyde, methanol, and acetaldehyde. The results demonstrate that compliance with the Acceptable Ambient Concentrations (AACs) for these compounds.

### **IV. Regulated Equipment Requirements**

#### **A. Brief Process Description**

The facility has proposed to replace the existing three burners/dryers with one single wood-fired burner/furnace (FUR) rated at 200 MMBTU/hr for providing direct heat to a new dryer (DRY). PM emissions from the new burner/dryer will be controlled using a new wet electrostatic precipitator (WESP). VOC and HAPs emissions will be controlled using a Regenerative Thermal Oxidizer (RTO).

Downstream of the dryer, the 7 dry hammermills will be vented individually to its own cyclo-filter (CYFL1-7) and then to a regenerative catalytic oxidizer (RCO) which is shared with the pellet presses and pellet coolers.

PM and VOC emissions from the 15 pellet presses and 3 pellet coolers (3 pellet lines) will be controlled using a baghouse on each line, then all baghouse exhausts will be routed to the RCO.

Hazlehurst Pellet Plant is designed to produce up to 675,000 Oven dry ton/year (625,000 actual tons at final moisture of ~4%) of wood pellets. The dryer DRY can product up to 675,000 ODT/yr of wood pellet sawdust furnish. The difference in production between 675k tpy and 625k tpy was explained as water loss; although the measuring unit is the same (Oven dried tons = 11% moisture), actual moisture content goes from 11% out of the dryer to 8% out of the hammermills, to 4% out of the pellet cooler.

The applicant does not intend to purchase pre-dried material and pelletize that material. However, if they do, the emissions from the pelletizing will be accounted for because production will be tracked both from the dryer exit and the finished pellet exit (after the pellet coolers near the final product handling and loadout area (HAND)).

## B. Equipment List for the Process

| Emission Units |                                                                      | Specific Limitations/Requirements                           |                                                                                                                                           | Air Pollution Control Devices |                                 |
|----------------|----------------------------------------------------------------------|-------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|---------------------------------|
| ID No.         | Description                                                          | Applicable Requirements/Standards                           | Corresponding Permit Conditions                                                                                                           | ID No.                        | Description                     |
| WOOD           | Log storage/handling<br>Debarking/screening<br>Chipper<br>Chip piles | 391-3-1-.02(2)(n)                                           | 3.4.3, 3.4.4, 5.2.7, 5.2.8                                                                                                                |                               |                                 |
| GHM            | Green Hammermills (2)                                                | 391-3-1-.02(2)(n)                                           | 3.4.3, 3.4.4, 5.2.7, 5.2.8                                                                                                                |                               |                                 |
| FUR            | Wood fired furnace<br>200 MMBTU/hr                                   | 391-3-1-.02(2)(g)<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(g) | 3.2.1, 3.2.3, 3.4.1, 3.4.2,<br>3.4.5, 4.2.1, 4.2.4, 4.2.5,<br>5.2.1, 5.2.2, 5.2.5, 5.2.6,<br>5.2.14, 5.2.15, 6.2.1-6.2.7                  | WESP                          | Wet Electrostatic Precipitator  |
| DRY            | Pellet Dryer<br>78 ODT/hr                                            | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(n) | 2.1.6, 3.2.1, 3.2.3, 3.4.1,<br>3.4.2, 3.4.3, 3.4.4, 4.2.1,<br>4.2.4, 5.2.1, 5.2.2, 5.2.5,<br>5.2.6, 5.2.9, 5.2.14, 5.2.15,<br>6.2.1-6.2.7 | RTO                           | Regenerative Thermal Oxidizer   |
| HAM1-7         | Dry Hammermills (7)                                                  | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(n) | 3.2.2, 3.2.4, 3.4.1, 3.4.2,<br>4.2.2, 4.2.4, 5.2.1, 5.2.3,<br>5.2.4, 5.2.6, 5.2.7, 5.2.8,<br>5.2.10-5.2.17, 6.2.3-6.2.7                   | CYFL1-7                       | Cyclofilters 1-7                |
| PEL1-5         | Line 1 Presses (5)                                                   | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)                      | 3.2.2, 3.2.4, 3.4.1, 3.4.2,<br>4.2.2, 4.2.4, 5.2.1, 5.2.3,<br>5.2.4, 5.2.6, 5.2.7, 5.2.8,<br>5.2.9-5.2.17, 6.2.1-6.2.7                    | BH1                           | Baghouse 1                      |
| COOL1          | Line 1 Cooler                                                        | 391-3-1-.02(2)(n)                                           |                                                                                                                                           | RCO                           | Regenerative Catalytic Oxidizer |
| PEL6-10        | Line 2 Presses (5)                                                   | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)                      | 3.2.2, 3.2.4, 3.4.1, 3.4.2,<br>4.2.2, 4.2.4, 5.2.1, 5.2.3,<br>5.2.4, 5.2.6, 5.2.7, 5.2.8,<br>5.2.9-5.2.17, 6.2.1-6.2.7                    | BH2                           | Baghouse 2                      |
| COOL2          | Line 2 Cooler                                                        | 391-3-1-.02(2)(n)                                           |                                                                                                                                           | RCO                           | Regenerative Catalytic Oxidizer |
| PEL11-15       | Line 3 Presses (5)                                                   | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)                      | 3.2.2, 3.2.4, 3.4.1, 3.4.2,<br>4.2.2, 4.2.4, 5.2.1, 5.2.3,<br>5.2.4, 5.2.6, 5.2.7, 5.2.8,<br>5.2.9-5.2.17, 6.2.1-6.2.7                    | BH3                           | Baghouse 3                      |
| COOL3          | Line 3 Cooler                                                        | 391-3-1-.02(2)(n)                                           |                                                                                                                                           | RCO                           | Regenerative Catalytic Oxidizer |
| HAND           | Pellet Handling/storage/<br>Loadout/silos 1-4                        | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(n) | 3.4.1-3.4.5, 4.2.3, 6.2.4,<br>6.2.5                                                                                                       |                               |                                 |

\* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.



### C. Equipment & Rule Applicability

NSPS Subpart Dc does not apply to the proposed wood burner/furnace since it supplies direct heat to the pellet furnish dryer. The burner/furnace does not produce steam, heat water or other heat transfer fluid and is not a boiler or fuel burning equipment. The opacity of visible emissions from the dryers, hammermills, pellet presses and pellet coolers are limited to 40% by Georgia Rule (b). PM emissions from the pellet furnish dryer, hammermill, pellet presses and pellet coolers will be subject to Georgia Rule (e).

The sulfur content of sawdust fired in the dryer burner is limited to 3% by weight by Georgia Rule (g)2 ; no sulfur monitoring is necessary due to the natural low sulfur content of the wood. Fugitive emissions from the dryer, Hammermills, Pellet presses and Pellet coolers are limited to 20% by Georgia Rule (n)2.

### D. Permit Conditions

Condition 3.2.1 requires the operation of WESP and RTO whenever the pellet furnish dryer operates for compliance with the VOC and HAPs PSD avoidance limit.

Condition 3.2.2 requires the Permittee to operate and maintain all baghouses and RCO during operation of the dry hammermills, pellet presses and pellet coolers to comply with the PSD avoidance limits for PM, CO and VOC.

Condition 3.2.3 requires operation of RTO at 1500 °F or the temperature established during the most recent destruction efficiency test that demonstrates compliance with the 95% reduction/destruction efficiency, whichever is higher.

Condition 3.2.4 requires operation of RCO at 800 °F or the temperature established during the most recent destruction efficiency test that demonstrates compliance with the 95% reduction/destruction efficiency, whichever is higher.

Existing Condition 3.3.1 and 3.3.2 were deleted since the new wood-fired burner/furnace is not subject to the requirements of NSPS Subpart Dc. The new burner is not a boiler or a fuel burning equipment and it does not heat water or any other heat transfer fluid or generate steam.

Existing Conditions 3.4.3 and 3.4.4 are not included in this permit amendment since the sources to which the conditions pertain will no longer be at the facility.

Existing Conditions 3.4.8 and 3.4.9 are not included in this permit amendment, since the sources to which the conditions pertain will no longer be at the facility.

Existing Condition 3.5.3, 3.5.4 and 3.5.5 are not included in this permit amendment since the sources to which the conditions apply will no longer be at the facility.

**V. Testing Requirements (with Associated Record Keeping and Reporting)**

To ensure that the emission factors used reflect actual emissions, the facility must test the RTO and RCO within 120 days after startup and thereafter every 3 years. If the test results are higher than the permitted emission factors, the permittee must use the new, higher test result-based factor and submit an application to revise the permitted factor upward accordingly. If the tests show lower emission factors, the permitted factors will still be used. The permitted emission factors can be altered down only via a permit application that has been reviewed and permit amendment issued by GEPD.

HAND must be tested for VOC since the factor to be used is lower than the EPD default factor. EPD proposes to require testing on only one silo in HAND to represent the emissions profile for the four identical silos. This is a one-time test requirement.

## **VI. Monitoring Requirements (with Associated Record Keeping and Reporting)**

The control device operating parameters to be monitored are pressure drop across the three baghouses (even though the downstream RCO will also serve as additional PM control), total power in the WESP (even though the downstream RTO will also serve as additional PM control), and RTO/RCO temperature.

The daily visibility check has a 20% opacity action level, which is lower than the 30% proposed because EPD has determined that any opacity from these sources over 20% would likely indicate a mechanical problem and the applicant has not provided any data demonstrating that opacity above 20% is normal “compliant” operation.

To ensure proper operation of the RCO, the permit will require a maintenance plan, as well as annual catalyst bed core samples to ensure activity.

CAM conditions address the selected operating parameters accordingly. VOC and PM from both RTO and RCO are subject to CAM because pre-control emissions exceed 100 tpy and controls are used to comply. PM is subject to the emission standard of Georgia Rule (e). It is not clear in Part 64 if annualized PSD avoidance limits are considered “emissions standards” for the purposes of CAM, but in an abundance of caution, EPD has included this for VOC.

Existing Condition 5.2.13 is not included in this permit amendment since the baghouse Preventive Maintenance Program (PMP) is addressed by Condition 5.2.4.

## **VII. Other Record Keeping and Reporting Requirements**

Condition 6.1.7.c. requires reporting of excursion of wood-fired furnace exhaust visible emissions, visible emission exceeding the 20% opacity action level from dry hammermills, pellet presses and pellet coolers for two or more consecutive days. RTO and RCO combustion temperature excursions also need to be reported. Fugitive dust emission episodes need to be reported as excursions. Any failure to perform the daily fugitive dust source inspection need to be reported as well. Any baghouse pressure drops outside the normal range also needs reporting.

Conditions 6.2.1-6.2.6 require tracking of production and calculation of emissions using the factors cited in previous sections of this amendment.

**VIII. Specific Requirements**

- A. Operational Flexibility  
None requested in this permit application.
- B. Alternative Requirements  
None
- C. Insignificant Activities  
No insignificant activities are added as part of this minor modification.
- D. Temporary Sources  
Not applicable.
- E. Short-Term Activities  
No short term activities were included in this modification.
- F. Compliance Schedule/Progress Reports  
Not applicable.
- G. Emissions Trading  
Not applicable.
- H. Acid Rain Requirements/CAIR/CSPAR  
Not applicable.
- I. Prevention of Accidental Releases  
This modification doesn't change the source's applicability which remains non-applicable
- J. Stratospheric Ozone Protection Requirements  
This modification doesn't change the source's applicability to Title VI.
- K. Pollution Prevention  
None.
- L. Specific Conditions  
None.

**Addendum to Narrative**

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//

## Homeowners seek EPA's help with pollution complaints

By Zach Parker The Citizen  
Nov 5, 2014

1 of 2



**HOMEOWNERS IN** the Cheniere Drew community in West Monroe are reaching out to the EPA for help over the emission of sawdust from Bayou Wood Pellets on Hwy 15 (above) over their homes and properties. The group of homeowners claim the sawdust falls so regularly that washed vehicles accumulate thick layers of dust over several hours.

Citizen photo by Zach Parker

A group of homeowners in the Cheniere Drew community in West Monroe asked the Environmental Protection Agency to investigate sawdust emissions from a wood pellets factory near their homes.

Representatives of the Drew Community of Concerned Citizens group sent a letter to the EPA's Region 6 headquarters in Dallas, Texas, last month, asking the agency to investigate Bayou Wood Pellet LLC's plant off Highway 15. The group is made up of homeowners who live near the plant, which manufactures wood pellets.

The plant has "been polluting our community for many months with wood dust and noise," the group's letter said. "Many people have recently moved from this area because of the pollution and noise."

The group claims its complaints and pleas to the state Department of Environmental Quality (DEQ) have not yielded a reduction in the pollution. The group decided to reach out to the EPA since DEQ inspections of Bayou Wood did not halt sawdust emissions.

“They (DEQ) have not helped us in any manner,” the letter said.



In its letter, the group describes the area as a “nice community,” made up of churches, businesses, many homes, Glenwood Family Medical Practice and Drew Elementary School. Some 800 students attend Drew Elementary, which is located across the highway from Bayou Wood’s plant.



## Effortless Deal on Temu

Temu

“The sawdust falling on us is a fine powdered dust and it goes everywhere,” said Johnny Holyfield, a spokesman for the group. Holyfield and his family live in the neighborhood around Bayou Wood’s plant. He also is a minister at Faith Christian Church, located next door to the wood pellet factory.

Holyfield said Bayou Wood’s plant sprays dust continually over the area’s homes and vehicles. The dust covering their properties was not simply the result of seasonal pollen or of dust kicked up in yards or on blacktop roadways, Holyfield said.

On several occasions, members of the group showed The Ouachita Citizen sawdust falling from the sky onto their properties as well as thick layers of sawdust on area foliage.

“When the leaves fall during autumn, the dust gets twice as bad,” said Jerry Walker, a group member whose home is located west of Bayou Wood’s plant.

According to group members, the sawdust sprayed over their community has made enjoying the outdoors difficult. The sawdust, the group’s members claim, falls into their swimming pools like sand, infiltrates automobile engines, slips into attic spaces and has become a breathing hazard for humans as well as for pets and Drew Elementary students at recess.

“We’ve lived here 17 years, built this deck so we could sit outside but we can’t because of the dust,” said Walker’s wife, Kaila Walker. “I have asthma, and have to take breathing treatments sometimes when it’s so heavy. Sometimes, the smell of fresh sawdust gets overpowering. It’s terrible.”

In its letter, the group said it approached Steve Tippen, president at Bayou Wood, on numerous occasions.



“He has flatly refused to help,” the letter said. “Mr. Tippen has at night, on many occasions, turned out the lights and run machinery at maximum effort, possibly without filters and polluting our wildlife and domestic animals.”

Tippen was unavailable for comment.

“They (Bayou Wood) seem to be running the most at night, and they used to have lights on at night so you could easily see all the dust but they don’t turn those lights on at night anymore,” Holyfield said.

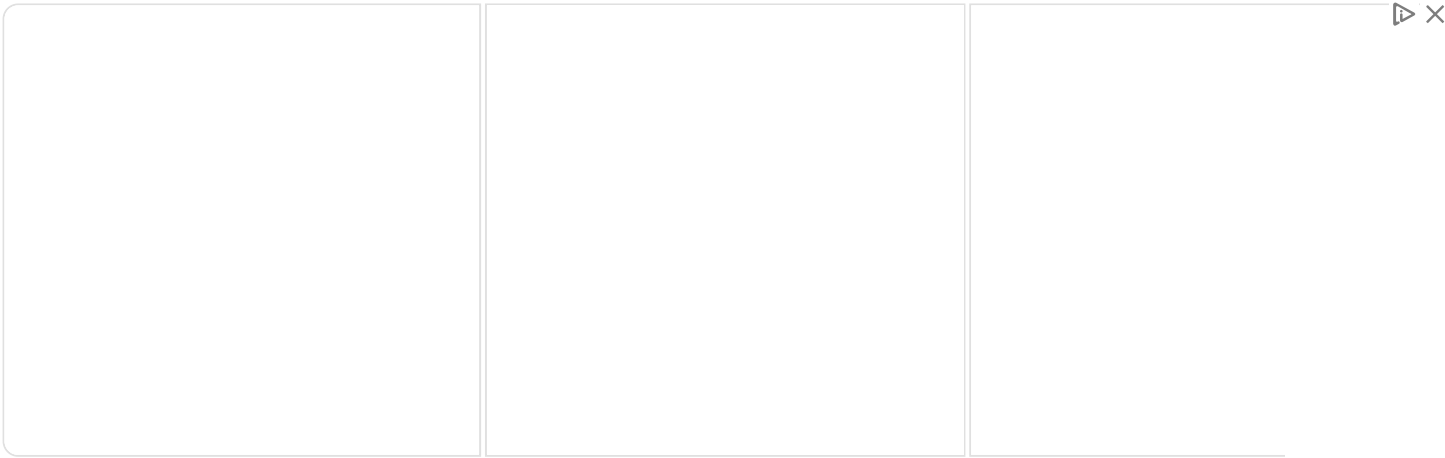
Since the beginning of the year, the group contends the plant runs machinery 24 hours a day, seven days a week, often becoming much louder at night than during the day and resulting in a heavier spread of sawdust over their community.

“They’re (Bayou Wood) not supposed to have the trucks going at night but that happens all the time,” Kaila Walker said. “Late at night, those trucks keep going and the front loader as well and it all sounds like a train coming through my bedroom wall.”



The group’s members agreed the sawdust emissions and factory noise did not become a problem until about a year ago.

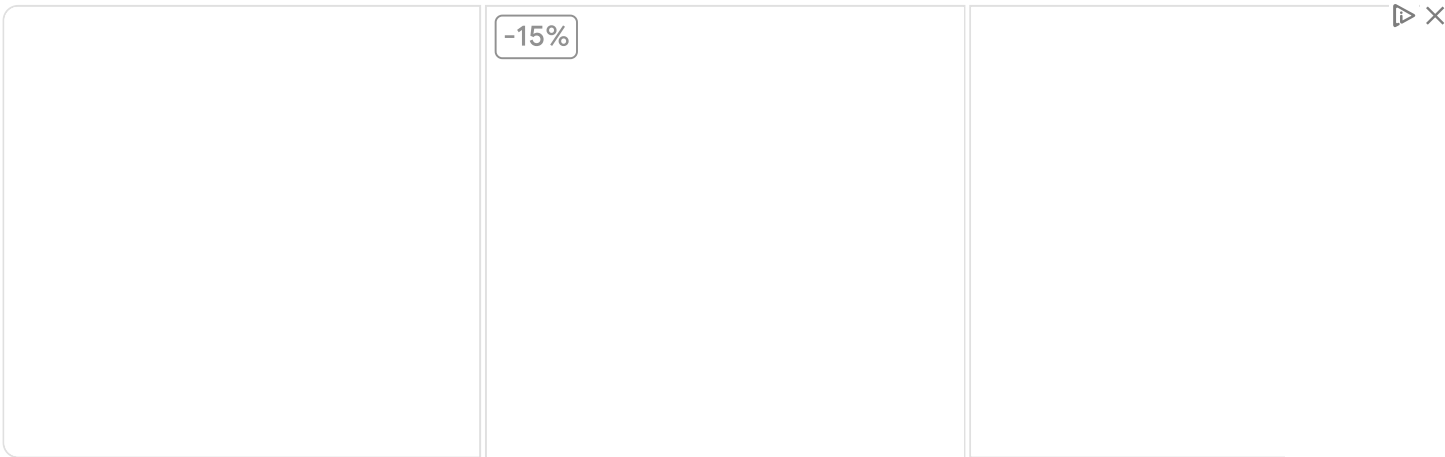
“More than a year ago, Mr. Tippen would only run it during daylight hours,” Kaila Walker said. “I don’t understand. We didn’t have this problem back then.”



### Effortless Deal on Temu

Temu

According to published reports, Bayou Wood was bought in August 2013 by Gulf Coast Renewable Energy LLC. At the time of the purchase, Bayou Wood’s plant had the capacity to produce 54,000 metric tons of wood pellets per year. Gulf Coast Renewable Energy announced last year it would expand production capacity to 120,000 metric tons per year with the expansion set to be completed by the end of January 2014.



### Effortless Deal on Temu

Temu

In January and February, DEQ observed wood particle emissions released at the facility’s unloading and loading bay areas during two separate inspections. The emissions detailed during the two inspections were in violation of state law and department regulations since the facility was not permitted to emit wood particles from those areas.

“The trucks going in and out of the plant create dust going everywhere,” Holyfield said. “They’re supposed to have curtains, an enclosed space, everything to keep these trucks from creating dust, too.”

According to reports filed with DEQ, the department issued a warning letter to Bayou Wood Products (Pellets) in February concerning the facility’s compliance with the Louisiana Environmental Quality Act and Air Quality Regulations. Bayou Wood responded to DEQ after a third inspection on May 1 with

details of measures taken to ensure compliance with environmental regulations.

At the end of May, DEQ inspector Blake Watson conducted an inspection at the facility and surrounding area. The reports and citizen complaints prompting the inspection indicated “the facility was releasing sawdust into the air covering the community,” according to Watson’s field interview form.

“At the time of arrival (on May 27), emissions were observed at the loading and unloading area,” Watson said in his field interview form.

When Watson contacted Jerry Coleman, general manager at Bayou Wood, about the emissions during his inspection, Coleman said the wood pellet company was still in the process of installing a damper in the plant’s exhaust stack to reduce emissions.

Following Watson’s inspection, DEQ issued a compliance order to Bayou Wood on June 11 for violations of environmental regulations. The compliance order required Bayou Wood to become compliant by Aug. 15 in light of the unlawful emissions observed throughout the year.

On June 30, PPM Consultants Inc., submitted a response to DEQ on behalf of Bayou Wood, claiming the wood pellet company “immediately addressed wood particulate emissions that were documented” in the January inspection. Bayou Wood, according to PPM’s letter, also installed control measures and began building other facilities to help contain emissions in response to DEQ’s compliance order.

PPM Consultants is an environmental consulting firm headquartered in Monroe.

According to Greg Langley, a spokesman for DEQ Secretary Peggy Hatch, Bayou Wood had met all requirements in the compliance order by the deadline.

“They are under compliance according to the compliance order for their earlier violations,” Langley said.

Langley said DEQ had received additional citizen complaints after the compliance order’s deadline and that the issue was still under investigation.

Though Bayou Wood said it would add a damper to the plant’s exhaust stack, members of the homeowner’s group claim the damper is only used on some occasions.

“The Sunday after they first had the crane up putting the filter in the exhaust stack, a fire truck responded,” Holyfield said. “There was a fire inside, smoke, but still a fire. After that, the stack began blowing like usual again.”

The group's members contend the factory does not use the damper most of the time because it impedes the plant's production.

# Appendix C

## **Emission Calculations**



Table C-1 - Facility-Wide Potential Emissions

| Emissions ID                                         | Emissions Source                        | Fugitive or Point? | PM Filterable | PM <sub>10</sub> Total <sup>1</sup> | PM <sub>2.5</sub> Total <sup>1</sup> | NO <sub>x</sub> | CO         | VOC       | SO <sub>2</sub> | CO <sub>2</sub> e |
|------------------------------------------------------|-----------------------------------------|--------------------|---------------|-------------------------------------|--------------------------------------|-----------------|------------|-----------|-----------------|-------------------|
| TD-01                                                | Truck Dumper - White Wood               | Fugitive           | 0.41          | 0.19                                | 0.03                                 | -               | -          | -         | -               | -                 |
| TD-02                                                | Truck Dumper - Chips                    | Fugitive           | 0.46          | 0.22                                | 0.03                                 | -               | -          | -         | -               | -                 |
| TD-03                                                | Truck Dumper - Bark                     | Fugitive           | 0.27          | 0.13                                | 0.02                                 | -               | -          | -         | -               | -                 |
| SP-01                                                | Storage Pile - White Wood               | Fugitive           | 0.65          | 0.32                                | 0.16                                 | -               | -          | -         | -               | -                 |
| SP-02                                                | Storage Pile - Chips                    | Fugitive           | 0.65          | 0.32                                | 0.16                                 | -               | -          | -         | -               | -                 |
| SP-03                                                | Storage Pile - Bark                     | Fugitive           | 0.65          | 0.32                                | 0.16                                 | -               | -          | -         | -               | -                 |
| VEH-01                                               | Vehicle Traffic - Trucks                | Fugitive           | 10.70         | 3.18                                | 0.32                                 | -               | -          | -         | -               | -                 |
| VEH-02                                               | Vehicle Traffic - Front End Loader      | Fugitive           | 17.69         | 5.29                                | 0.53                                 | -               | -          | -         | -               | -                 |
| EP-01                                                | Chips Cleaning Line Cyclone             | Point              | 29.81         | 7.45                                | 1.27                                 | -               | -          | -         | -               | -                 |
| EP-02                                                | Wet Hammer Mill Cyclone 1               | Point              | 8.38          | 2.10                                | 0.36                                 | -               | -          | -         | -               | -                 |
| EP-03                                                | Wet Hammer Mill Cyclone 2               | Point              | 8.38          | 2.10                                | 0.36                                 | -               | -          | -         | -               | -                 |
| EP-04                                                | Drying Line (cyclones, WESP, RTO)       | Point              | 33.88         | 55.81                               | 55.81                                | 227.76          | 183.96     | 28.80     | 18.05           | 161244            |
| EP-05                                                | Dry Product Intermediate Storage 1      | Point              | 0.07          | 0.07                                | 0.07                                 | -               | -          | -         | -               | -                 |
| EP-06                                                | Dry Product Intermediate Storage 2      | Point              | 0.07          | 0.07                                | 0.07                                 | -               | -          | -         | -               | -                 |
| EP-08                                                | Dry Hammer Mill and Pellet Cooler (RCO) | Point              | 8.19          | 8.30                                | 8.30                                 | 1.82            | 0.77       | 37.67     | 0.01            | 2319              |
| EP-09                                                | Milled Dry Product Intermediate Storage | Point              | 0.07          | 0.07                                | 0.07                                 | -               | -          | -         | -               | -                 |
| EP-10                                                | Pellet Storage Silo 1                   | Point              | 3.85          | 2.35                                | 0.89                                 | -               | -          | -         | -               | -                 |
| EP-11                                                | Pellet Storage Silo 2                   | Point              | 3.85          | 2.35                                | 0.89                                 | -               | -          | -         | -               | -                 |
| EP-12                                                | Pellet Storage Silo 3                   | Point              | 3.85          | 2.35                                | 0.89                                 | -               | -          | -         | -               | -                 |
| EP-13                                                | Pellet Storage Silo 4                   | Point              | 3.85          | 2.35                                | 0.89                                 | -               | -          | -         | -               | -                 |
| EP-14                                                | Pellet Storage Silo 5                   | Point              | 3.85          | 2.35                                | 0.89                                 | -               | -          | -         | -               | -                 |
| EP-15                                                | Product Loadout (truck)                 | Fugitive           | 0.02          | 0.01                                | 0.00                                 | -               | -          | -         | -               | -                 |
| GEN-01                                               | Emergency Generator                     | Point              | 0.01          | 0.01                                | 0.01                                 | 0.17            | 0.14       | 0.06      | 0.05            | 29                |
| <b>Point Source Total Emissions:</b>                 |                                         |                    | <b>108</b>    | <b>88</b>                           | <b>71</b>                            | <b>230</b>      | <b>185</b> | <b>67</b> | <b>18</b>       | <b>163592</b>     |
| Title V Threshold (Point Sourced Only):              |                                         |                    | --            | 100                                 | 100                                  | 100             | 100        | 100       | 100             | --                |
| Title V Threshold Exceeded? (Yes/No):                |                                         |                    | --            | No                                  | No                                   | Yes             | Yes        | No        | No              | --                |
| PSD New Major Source Threshold (Point Sources Only): |                                         |                    | --            | 250                                 | 250                                  | 250             | 250        | 250       | 250             | 100000            |
| PSD New Major Source Threshold Exceeded? (Yes/No):   |                                         |                    | --            | No                                  | No                                   | No              | No         | No        | No              | No <sup>2</sup>   |
| Facility-wide Total Emissions:                       |                                         |                    | 140           | 98                                  | 72                                   | 230             | 185        | 67        | 18              | 163592            |

## Notes:

1 PM<sub>10</sub> and PM<sub>2.5</sub> Total includes condensable PM

"-" Indicates that pollutant is not emitted from this source

2 CO<sub>2</sub>e cannot trigger PSD unless already triggered by another pollutant

| Table C-2. Facility HAP/TAP Emissions |                                          |      |      | Dry Hammermills and Pelletizers |          |         |          | Dryer     |          |          |          | RTO (Natural gas combustion) |          |          |          | RCO (Natural gas combustion) |          |          |          | Emergency Backup Generator |          |          |          | Totals   |          |          |          | WAC TAP Review              |                  |                |                   |                 |             |           |                       |          |          |          |
|---------------------------------------|------------------------------------------|------|------|---------------------------------|----------|---------|----------|-----------|----------|----------|----------|------------------------------|----------|----------|----------|------------------------------|----------|----------|----------|----------------------------|----------|----------|----------|----------|----------|----------|----------|-----------------------------|------------------|----------------|-------------------|-----------------|-------------|-----------|-----------------------|----------|----------|----------|
| CAS                                   | Pollutant Name                           | HAP? | TAP? | ton/yr                          | lb/yr    | lb/hr   | lb/24hr  | ton/yr    | lb/yr    | lb/hr    | lb/24hr  | ton/yr                       | lb/yr    | lb/hr    | lb/24hr  | ton/yr                       | lb/yr    | lb/hr    | lb/24hr  | ton/yr                     | lb/yr    | lb/hr    | lb/24hr  | ton/yr   | lb/yr    | lb/hr    | lb/24hr  | de minimis level lb/avg per | averaging period | TAP lb/avg per | De Minimis Check? | SOER lb/avg per | SOER Check? | ASL µg/m³ | Modeling Result µg/m³ |          |          |          |
| 56-49-5                               | 3-Methylcholanthrene                     | No   | Yes  | 0                               | 0        | 0       | 0        | 0         | 0        | 0        | 0        | 6.18E-08                     | 0.000124 | 1.41E-08 | 3.39E-07 | 3.48E-08                     | 6.96E-05 | 7.94E-09 | 1.91E-07 | 0                          | 0        | 0        | 0        | 9.66E-08 | 1.93E-04 | 2.21E-08 | 5.29E-07 | 0.00078                     | year             | 0.00019324     | de minimis        | 0.016           | < SOER      | ---       | ---                   |          |          |          |
| 106-99-0                              | 1,3-Butadiene                            | Yes  | Yes  | 0                               | 0        | 0       | 0        | 0         | 0        | 0        | 0        | 0                            | 0        | 0        | 0        | 0                            | 0        | 0        | 0        | 0                          | 0.000978 | 1.955    | 0.01955  | 0.01955  | 5.79E-04 | 1.96E-02 | 1.96E-02 | 0.27                        | year             | 1.955          | Exceeds           | 5.4             | < SOER      | ---       | ---                   |          |          |          |
| 57-97-6                               | 7,12-Dimethylbenzo[ <i>a</i> ]anthracene | No   | Yes  | 0                               | 0        | 0       | 0        | 0         | 0        | 0        | 0        | 5.5E-07                      | 0.001099 | 1.25E-07 | 3.01E-06 | 3.09E-07                     | 0.000618 | 7.06E-08 | 1.69E-06 | 0                          | 0        | 0        | 0        | 0.000978 | 1.955    | 0.01955  | 0.01955  | 8.86E-04                    | 1.96E-02         | 1.96E-02       | 0.000069          | year            | 1.72E-03    | Exceeds   | 1.40E-03              | Exceeds  | 8.50E-06 | 1.42E-08 |
| 71-55-6                               | 1,1,1-Trichloroethane                    | Yes  | Yes  | 0                               | 0        | 0       | 0        | 0.000134  | 0.268582 | 3.07E-05 | 0.000736 | 0                            | 0        | 0        | 0        | 0                            | 0        | 0        | 0        | 0                          | 0        | 0        | 0        | 0        | 1.34E-04 | 2.69E-01 | 1.07E-05 | 7.36E-04                    | 19               | 24-hr          | 0.00073584        | de minimis      | 370         | < SOER    | ---                   | ---      |          |          |
| 95-63-6                               | 1,2,4-Trimethyl benzene                  | No   | Yes  | 0                               | 0        | 0       | 0        | 0.001007  | 2.014362 | 0.00023  | 0.005519 | 0                            | 0        | 0        | 0        | 0                            | 0        | 0        | 0        | 0                          | 0        | 0        | 0        | 0        | 1.01E-03 | 2.01E+00 | 2.30E-04 | 5.52E-03                    | 0.22             | 24-hr          | 0.0055188         | de minimis      | 4.4         | < SOER    | ---                   | ---      |          |          |
| 75-07-0                               | Acetaldehyde                             | Yes  | Yes  | 0                               | 0        | 0       | 0        | 0.141482  | 290.9634 | 0.03215  | 0.79716  | 0                            | 0        | 0        | 0        | 0                            | 0        | 0        | 0        | 0                          | 0        | 0.019175 | 38.35    | 0.3835   | 1.65E-01 | 3.29E-02 | 4.17E-01 | 1.18E+05                    | 1                | year           | 3.29E-02          | Exceeds         | 6.00E-01    | Exceeds   | 3.70E-01              | 8.58E-03 |          |          |
| 98-86-2                               | Acetophenone                             | Yes  | No   | 0                               | 0        | 0       | 0        | 0.000716  | 1.432435 | 0.000164 | 0.003924 | 0                            | 0        | 0        | 0        | 0                            | 0        | 0        | 0        | 0                          | 0        | 0        | 0        | 0        | 7.16E-04 | 1.43E+00 | 1.64E-04 | 3.92E-03                    | N/A              | IN/A           | IN/A              | IN/A            | IN/A        | IN/A      | ---                   | ---      |          |          |
| 107-02-8                              | Acrolein                                 | Yes  | Yes  | 0                               | 0        | 0       | 0        | 0.050359  | 100.7181 | 0.011498 | 0.27594  | 0                            | 0        | 0        | 0        | 0                            | 0        | 0        | 0        | 0                          | 0.000042 | 0.084    | 0.00084  | 0.00084  | 4.21E-05 | 8.42E-02 | 8.40E-04 | 8.41E-04                    | 0.045            | year           | 8.42E-02          | Exceeds         | 8.90E-01    | < SOER    | ---                   | ---      |          |          |
| 56-55-3                               | Benz[a]anthracene                        | Yes  | Yes  | 0                               | 0        | 0       | 0        | 0         | 0        | 0        | 0        | 6.18E-08                     | 0.000124 | 1.41E-08 | 3.39E-07 | 3.48E-08                     | 6.96E-05 | 7.94E-09 | 1.91E-07 | 0.000042                   | 0.084    | 0.00084  | 0.00084  | 4.21E-05 | 8.42E-02 | 8.40E-04 | 8.41E-04 | 0.045                       | year             | 8.42E-02       | Exceeds           | 8.90E-01        | < SOER      | ---       | ---                   |          |          |          |
| 71-43-7                               | Benzene                                  | Yes  | Yes  | 0                               | 0        | 0       | 0        | 0.011079  | 22.15798 | 0.002329 | 0.060707 | 7.21E-05                     | 0.144282 | 1.65E-05 | 0.000395 | 4.06E-05                     | 0.081159 | 9.26E-06 | 0.000222 | 46.65                      | 0.4665   | 0.4665   | 5.34E-03 | 6.90E-01 | 4.69E-01 | 5.28E-01 | 1        | year                        | 6.90E+01         | Exceeds        | 2.10E+01          | Exceeds         | 1.30E-01    | 1.03E-02  |                       |          |          |          |
| 50-32-8                               | Benzol[a]pyrene                          | Yes  | Yes  | 0                               | 0        | 0       | 0        | 0         | 0        | 0        | 0        | 4.12E-08                     | 8.24E-05 | 9.41E-09 | 2.26E-07 | 2.32E-08                     | 4.64E-05 | 5.29E-09 | 1.27E-07 | 4.73E-06                   | 0.0094   | 0.00094  | 0.00094  | 4.76E-05 | 9.53E-04 | 9.40E-05 | 9.40E-05 | 0.0082                      | year             | 9.53E-03       | Exceeds           | 1.60E-01        | < SOER      | ---       | ---                   |          |          |          |
| 205-99-2                              | Benzol[b]fluoranthene                    | Yes  | Yes  | 0                               | 0        | 0       | 0        | 0         | 0        | 0        | 0        | 6.18E-08                     | 0.000124 | 1.41E-08 | 3.39E-07 | 3.48E-08                     | 6.96E-05 | 7.94E-09 | 1.91E-07 | 2.48E-06                   | 0.004955 | 4.96E-05 | 4.96E-05 | 2.57E-06 | 5.15E-03 | 4.96E-05 | 5.01E-05 | 0.045                       | year             | 0.00514824     | de minimis        | 0.89            | < SOER      | ---       | ---                   |          |          |          |
| 207-08-9                              | Benzol[b]fluoranthene                    | Yes  | Yes  | 0                               | 0        | 0       | 0        | 0         | 0        | 0        | 0        | 6.18E-08                     | 0.000124 | 1.41E-08 | 3.39E-07 | 3.48E-08                     | 6.96E-05 | 7.94E-09 | 1.91E-07 | 3.88E-06                   | 0.00775  | 7.75E-05 | 7.75E-05 | 4.96E-05 | 9.94E-05 | 9.94E-05 | 0.0082   | year                        | 0.00794324       | de minimis     | 0.89              | < SOER          | ---         | ---       |                       |          |          |          |
| 92-52-4                               | Biphenyl                                 | Yes  | No   | 0                               | 0        | 0       | 0        | 0.000436  | 0.87289  | 9.86E-05 | 0.002391 | 0                            | 0        | 0        | 0        | 0                            | 0        | 0        | 0        | 0                          | 0        | 0        | 0        | 0        | 4.36E-04 | 8.73E-01 | 9.96E-05 | 2.39E-03                    | N/A              | IN/A           | IN/A              | IN/A            | IN/A        | IN/A      | ---                   | ---      |          |          |
| 117-81-7                              | Bis-(2-ethylhexyl phthalate)             | Yes  | Yes  | 0                               | 0        | 0       | 0        | 0.0003581 | 0.716216 | 0.000818 | 0.019622 | 0                            | 0        | 0        | 0        | 0                            | 0        | 0        | 0        | 0                          | 0        | 0        | 0        | 0        | 3.58E-03 | 7.16E+00 | 8.18E-04 | 1.96E-02                    | 3.4              | year           | 7.16E+00          | Exceeds         | 6.80E+01    | < SOER    | ---                   | ---      |          |          |
| 74-83-9                               | Bromomethane                             | Yes  | Yes  | 0                               | 0        | 0       | 0        | 0.000313  | 0.62669  | 7.15E-05 | 0.001717 | 0                            | 0        | 0        | 0        | 0                            | 0        | 0        | 0        | 0                          | 0        | 0        | 0        | 0        | 3.13E-04 | 6.27E-01 | 7.15E-05 | 1.72E-03                    | 0.019            | 24-hr          | 0.00171696        | de minimis      | 0.37        | < SOER    | ---                   | ---      |          |          |
| 75-15-0                               | Carbon disulfide                         | Yes  | Yes  | 0                               | 0        | 0       | 0        | 0.000201  | 0.402872 | 4.6E-05  | 0.001104 | 0                            | 0        | 0        | 0        | 0                            | 0        | 0        | 0        | 0                          | 0        | 0        | 0        | 0        | 2.01E-04 | 4.03E-01 | 4.60E-05 | 1.10E-03                    | 3                | 24-hr          | 0.00110376        | de minimis      | 59          | < SOER    | ---                   | ---      |          |          |
| 56-23-5                               | Carbon tetrachloride                     | Yes  | Yes  | 0                               | 0        | 0       | 0        | 0.000134  | 0.268582 | 3.07E-05 | 0.000736 | 0                            | 0        | 0        | 0        | 0                            | 0        | 0        | 0        | 0                          | 0        | 0        | 0        | 0        | 1.34E-04 | 2.69E-01 | 1.07E-05 | 7.36E-04                    | 1.4              | year           | 0.2685816         | de minimis      | 27          | < SOER    | ---                   | ---      |          |          |
| 74-87-3                               | Chloromethane                            | Yes  | Yes  | 0                               | 0        | 0       | 0        | 0.001231  | 2.461198 | 0.00281  | 0.060745 | 0                            | 0        | 0        | 0        | 0                            | 0        | 0        | 0        | 0                          | 0        | 0        | 0        | 0        | 1.23E-03 | 2.46E+00 | 2.81E-04 | 6.75E-03                    | 0.33             | 24-hr          | 0.0067452         | de minimis      | 6.7         | < SOER    | ---                   | ---      |          |          |
| 218-01-9                              | Chrysene                                 | No   | Yes  | 0                               | 0        | 0       | 0        | 0         | 0        | 0        | 0        | 6.18E-08                     | 0.000124 | 1.41E-08 | 3.39E-07 | 3.48E-08                     | 6.96E-05 | 7.94E-09 | 1.91E-07 | 8.83E-06                   | 0.01765  | 0.000177 | 0.000177 | 8.82E-06 | 1.78E-02 | 1.77E-04 | 1.77E-04 | 0.45                        | year             | 0.01794324     | de minimis        | 8.9             | < SOER      | ---       | ---                   |          |          |          |
| 98-82-8                               | Cumene                                   | Yes  | Yes  | 0                               | 0        | 0       | 0        | 0.000772  | 1.544344 | 0.000176 | 0.004231 | 0                            | 0        | 0        | 0        | 0                            | 0        | 0        | 0        | 0                          | 0        | 0        | 0        | 0        | 7.72E-04 | 1.54E+00 | 1.76E-04 | 4.23E-03                    | 1.5              | 24-hr          | 0.00423108        | de minimis      | 30          | < SOER    | ---                   | ---      |          |          |
| 84-74-2                               | Di-n-butyl phthalate                     | Yes  | No   | 0                               | 0        | 0       | 0        | 0.000257  | 0.514781 | 5.88E-05 | 0.00141  | 0                            | 0        | 0        | 0        | 0                            | 0        | 0        | 0        | 0                          | 0        | 0        | 0        | 0        | 2.57E-04 | 5.15E-01 | 5.88E-05 | 1.41E-03                    | N/A              | IN/A           | IN/A              | IN/A            | IN/A        | IN/A      | ---                   | ---      |          |          |
| 53-70-3                               | Dibenzod[ <i>a,h</i> ]anthracene         | Yes  | Yes  | 0                               | 0        | 0       | 0        | 0         | 0        | 0        | 0        | 4.12E-08                     | 8.24E-05 | 9.41E-09 | 2.26E-07 | 2.32E-08                     | 4.64E-05 | 5.29E-09 | 1.27E-07 | 1.46E-05                   | 0.02915  | 0.000292 | 0.000292 | 1.46E-05 | 2.93E-02 | 2.92E-04 | 2.92E-04 | 0.0041                      | year             | 2.93E-02       | Exceeds           | 8.20E-02        | < SOER      | ---       | ---                   |          |          |          |
| 100-41-4                              | Ethyl benzene                            | Yes  | Yes  | 0                               | 0        | 0       | 0        | 4.25E-05  | 0.085051 | 9.71E-06 | 0.000233 | 0                            | 0        | 0        | 0        | 0                            | 0        | 0        | 0        | 0                          | 0        | 0        | 0        | 0        | 4.25E-05 | 8.51E-02 | 9.71E-06 | 2.33E-04                    | 3.2              | year           | 0.08505084        | de minimis      | 65          | < SOER    | ---                   | ---      |          |          |
| 50-00-0                               | Formaldehyde                             | Yes  | Yes  | 0                               | 0        | 0       | 0        | 0.279773  | 559.545  | 0.063875 | 1.533    | 0.002576                     | 5.152941 | 0.000588 | 0.014118 | 0.001449                     | 2.898529 | 0.000331 | 0.007941 | 0.0295                     | 59       | 0.59     | 0.59     | 1.13E-01 | 6.27E+02 | 6.55E-01 | 2.15E+00 | 1.4                         | year             | 6.27E+02       | Exceeds           | 2.70E+01        | Exceeds     | 1.70E-01  | 1.33E-02              |          |          |          |
| 110-54-3                              | Hexane                                   | Yes  | Yes  | 0                               | 0        | 0       | 0        | 0.000291  | 0.59257  | 6.64E-05 | 0.001594 | 0.061835                     | 123.6706 | 0.014118 | 0.338824 | 0.034782                     | 69.56471 | 0.007941 | 0.190588 | 0                          | 0        | 0        | 0        | 0        | 9.69E-02 | 1.94E+02 | 2.21E-02 | 5.31E-01                    | 2.6              | 24-hr          | 0.53100608        | de minimis      | 52          | < SOER    | ---                   | ---      |          |          |
| 123-31-9                              | Hydroquinone                             | Yes  | No   | 0                               | 0        | 0       | 0        | 0.000671  | 1.342908 | 0.000153 | 0.003764 | 0                            | 0        | 0        | 0        | 0                            | 0        | 0        | 0        | 0                          | 0        | 0        | 0        | 0        | 6.71E-04 | 1.34E+00 | 1.53E-04 | 3.68E-03                    | N/A              | IN/A           | IN/A              | IN/A            | IN/A        | IN/A      | ---                   | ---      |          |          |
| 193-39-5                              | Indeno[1,2,3- <i>c,d</i> ]pyrene         | Yes  | Yes  | 0                               | 0        | 0       | 0        | 0         | 0        | 0        | 0        | 6.18E-08                     | 0.000124 | 1.41E-08 | 3.39E-07 | 3.48E-08                     | 6.96E-05 | 7.94E-09 | 1.91E-07 | 9.38E-06                   | 0.01875  | 0.000188 | 0.000188 | 9.47E-06 | 1.89E-02 | 1.88E-04 | 1.88E-04 | 0.045                       | year             | 0.01894324     | de minimis        | 0.89            | < SOER      | ---       | ---                   |          |          |          |
| 1330-20-7                             | m,p-Xylene                               | Yes  | Yes  | 0                               | 0        | 0       | 0        | 0.006155  | 12.30999 | 0.001405 | 0.033726 | 0                            | 0        | 0        | 0        | 0                            | 0        | 0        | 0        | 0                          | 0.007125 | 14.25    | 0.1425   | 1.33E-02 | 2.66E-01 | 1.44E-01 | 1.76E-01 | 0.82                        | 24-hr            | 0.00712501     | de minimis        | 1.60E-01        | < SOER      | ---       | ---                   |          |          |          |
| 67-56-1                               | Methanol                                 | Yes  | Yes  | 0                               | 0.080446 | 160.892 | 0.018367 | 0.4408    | 0.156673 | 313.3452 | 0.03577  | 0.85848                      | 0        | 0        | 0        | 0                            | 0        | 0        | 0        | 0                          | 0        | 0        | 0        | 0        | 2.37E-01 | 4.74E+02 | 5.41E-02 | 1.30E+00                    | 74               | 24-hr          | 1.29928           | de minimis      | 1500        | < SOER    | ---                   | ---      |          |          |
| 78-93-3                               | Methyl ethyl ketone                      | No   | Yes  | 0                               | 0        | 0       | 0        | 0.054835  | 109.6708 | 0.01252  | 0.300468 | 0                            | 0        | 0        | 0        | 0                            | 0        | 0        | 0        | 0                          | 0        | 0        | 0        | 0        | 5.48E-02 | 1.10E+02 | 2.25E-02 | 3.00E-01                    | 19               | 24-hr          | 0.300468          | de minimis      | 370         | < SOER    | ---                   | ---      |          |          |
| 108-10-1                              | Methyl isobutyl ketone                   | Yes  | Yes  | 0                               | 0        | 0       | 0        | 0.026898  | 53.71632 | 0.006132 | 0.147168 | 0                            | 0        | 0        | 0        | 0                            | 0        | 0        | 0        | 0                          | 0        | 0        | 0        | 0        | 2.69E-02 | 5.37E+01 | 6.13E-03 | 1.47E-01                    | 11               | 24-hr          | 0.147168          | de minimis      | 220         | < SOER    | ---                   | ---      |          |          |
| 75-09-2                               | Methylene chloride                       | Yes  | Yes  | 0                               | 0        | 0       |          |           |          |          |          |                              |          |          |          |                              |          |          |          |                            |          |          |          |          |          |          |          |                             |                  |                |                   |                 |             |           |                       |          |          |          |



Table C-3 - Raw Material Received - Handling

| Emission Point ID | Point or Fugitive | Emission Source                        | Throughput <sup>1</sup><br>(short tons/year) | Annual Hours of Operation<br>(hours/year) | Pollutant                    | Emission factor <sup>2</sup><br>(lb/BDton) | Number of "Drops" <sup>3</sup> | Potential Emissions<br>(lb/hr) (ton/year) |      |
|-------------------|-------------------|----------------------------------------|----------------------------------------------|-------------------------------------------|------------------------------|--------------------------------------------|--------------------------------|-------------------------------------------|------|
| TD1               | Fugitive          | Truck Dumper - White Wood <sup>4</sup> | 367333                                       | 8760                                      | Filterable PM                | 0.00075                                    | 3                              | 0.09                                      | 0.41 |
|                   |                   |                                        |                                              |                                           | Filterable PM <sub>10</sub>  | 0.00035                                    |                                | 0.04                                      | 0.19 |
|                   |                   |                                        |                                              |                                           | Filterable PM <sub>2.5</sub> | 0.00005                                    |                                | 0.01                                      | 0.03 |
| TD2               | Fugitive          | Truck Dumper - Chips                   | 411413                                       | 8760                                      | Filterable PM                | 0.00075                                    | 3                              | 0.11                                      | 0.46 |
|                   |                   |                                        |                                              |                                           | Filterable PM <sub>10</sub>  | 0.00035                                    |                                | 0.05                                      | 0.22 |
|                   |                   |                                        |                                              |                                           | Filterable PM <sub>2.5</sub> | 0.00005                                    |                                | 0.01                                      | 0.03 |
| TD3               | Fugitive          | Truck Dumper - Bark (Hog Fuel)         | 242440                                       | 8760                                      | Filterable PM                | 0.00075                                    | 3                              | 0.06                                      | 0.27 |
|                   |                   |                                        |                                              |                                           | Filterable PM <sub>10</sub>  | 0.00035                                    |                                | 0.03                                      | 0.13 |
|                   |                   |                                        |                                              |                                           | Filterable PM <sub>2.5</sub> | 0.00005                                    |                                | 0.00                                      | 0.02 |

1. Wet material based on mass balance flowchart provided by client.

2. PM emission factors from USEPA Memo "Particulate Matter Potential to Emit Emission Factors for Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest Indian Country," May 8, 2014. While the emission factors are in units of pounds per bone dry ton of material, the calculation conservatively uses the heavier estimate of "wet" material throughput to represent material flow through this process.

3. Emissions are generated from each "drop" of material from one surface to another. This includes each mechanical conveyance drop between point of generation and storage bin. In this instance, there is (1) drop from truck dumper to ground, (2) front end loader drop to storage pile, and (3) front end loader drop to walking floor bin.

4. As an alternating stockpiling scenario for white wood, PNWRE is considering using a radial stacker rather than using a front end loader for moving and stacking the white wood. Using a radial stacker would represent the same number of drop points as the front end loader method (truck unload to conveyor pickup, drop from conveyor to storage pile, conveyor drop to walking floor bin) while eliminating any associated front end loader traffic emissions for that material.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
AIR, WASTE, AND TOXICS

MAY 08 2014

**MEMORANDUM**

**SUBJECT:** Particulate Matter Potential to Emit Emission Factors for Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest Indian Country

**FROM:** Dan Meyer, Environmental Engineer  
Air Permits & Diesel Unit *DM*

**THRU:** Donald A. Dossett, P.E., Manager  
Air Permits & Diesel Unit *DD*

**TO:** Permit File

EPA Region 10 has compiled the attached list of particulate matter (PM – CAA § 111 pollutant, PM<sub>10</sub> and PM<sub>2.5</sub> – criteria pollutants) emission factors (“EFs”) for use in determining the potential emissions, more commonly referred to as potential to emit (“PTE”), for activities at sawmills, excluding boilers, located in Pacific Northwest Indian Country.<sup>1</sup> The EFs are presented in units appropriate for the particular activity. PTE generally represents the maximum capacity of a source to emit a pollutant under its physical and operational design taking into consideration restrictions that are federally enforceable. While PM, PM<sub>10</sub> and PM<sub>2.5</sub> PTE are all used to determine applicability of the Compliance Assurance Monitoring program and Prevention of Significant Deterioration construction permit program, only PM<sub>10</sub> and PM<sub>2.5</sub> are employed to determine applicability of the Title V operating permit program.<sup>2</sup>

The Federal Air Rules for Reservations (“FARR”) limit particulate matter emissions from applicable activities at sawmills. The rules and the rationale for not employing them to determine PTE are as follows: (a) 20 percent opacity limit (40 CFR § 49.124) – lack of a correlation between opacity and particulate matter emissions, (b) requirements for limiting fugitive emissions (40 CFR § 49.126) – lack of a correlation between compliance with requirements and particulate matter emissions, (c) non-combustion stack 0.1 grain per dry standard cubic foot PM emission limit (40 CFR § 49.125) – resultant PTE would be unrealistically high as we assume that an unreasonable amount of wood residue is exhausted to atmosphere rather than recovered for sale or combustion in on-site boiler.

There are no other federal regulations beyond the FARR that limit particulate matter emissions from activities addressed by this memorandum. Under the circumstances, it is appropriate to employ the EFs presented in the attachment to estimate PTE, unless a more representative (e.g. site-specific) EF is available.

<sup>1</sup> Activities include log bucking and debarking, sawing, lumber drying, mechanical and pneumatic conveyance of wood residue, wind erosion of wood residue piles and traffic along paved and unpaved roads.

<sup>2</sup> October 16, 1995 EPA memorandum entitled, “Definition of Regulated Pollutant for Particulate Matter for Purposes of Title V”

**EPA Region 10 Particulate Matter Potential to Emit Emission Factors for Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest Indian Country, May 2014**

| EF Reference No. | Emissions Generating Activity <sup>1</sup>                                                                                                                                                                                                                                                                                                     | PM <sup>2</sup> EF                                    | PM <sub>10</sub> % of PM | PM <sub>10</sub> EF | PM <sub>2.5</sub> % of PM | PM <sub>2.5</sub> EF | Units           |
|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------|--------------------------|---------------------|---------------------------|----------------------|-----------------|
| 1, 2, 3, 4       | Log Bucking <sup>3</sup>                                                                                                                                                                                                                                                                                                                       | 0.035                                                 | 50                       | 0.0175              | 25                        | 0.00875              | lb/ton log      |
| 1, 2, 3, 5       | Log Debarking <sup>3</sup>                                                                                                                                                                                                                                                                                                                     | 0.024                                                 | 50                       | 0.012               | 25                        | 0.006                | lb/ton log      |
| 1, 2, 3, 6       | Sawing <sup>3</sup>                                                                                                                                                                                                                                                                                                                            | 0.350                                                 | 50                       | 0.175               | 25                        | 0.0875               | lb/ton log      |
| 1, 3, 7          | Lumber Drying - Resinous Softwood Species <sup>4</sup>                                                                                                                                                                                                                                                                                         | 0.02                                                  | 100                      | 0.02                | 100                       | 0.02                 | lb/mbf          |
| 1, 3, 7          | Lumber Drying - Non-Resinous Softwood Species <sup>5</sup>                                                                                                                                                                                                                                                                                     | 0.05                                                  | 100                      | 0.05                | 100                       | 0.05                 | lb/mbf          |
| 1, 2, 3, 8       | "Drop" of "wet" material <sup>5</sup> from one surface to another including, but not limited to, (a) each mechanical conveyance drop between point of generation and storage bin (but not including bin unless open to atmosphere) (b) loadout from storage bin into a truck bed or railcar and (c) drop onto a pile. Apply EF to each "drop." | 0.00075                                               | N/A                      | 0.00035             | N/A                       | 0.00005              | lb/bdt material |
| 1, 2, 3, 8       | "Drop" of "dry" material <sup>5</sup> from one surface to another including, but not limited to, (a) each mechanical conveyance drop between point of generation and storage bin (but not including bin unless open to atmosphere) (b) loadout from storage bin into a truck bed or railcar and (c) drop onto a pile. Apply EF to each "drop." | 0.0015                                                | N/A                      | 0.0007              | N/A                       | 0.0001               | lb/bdt material |
| 1, 3, 9          | Pneumatically convey material <sup>6</sup> through medium efficiency cyclone to bin                                                                                                                                                                                                                                                            | 0.5                                                   | 85                       | 0.425               | 50                        | 0.25                 | lb/bdt material |
| 1, 3, 9          | Pneumatically convey material <sup>6</sup> through high efficiency cyclone to bin                                                                                                                                                                                                                                                              | 0.2                                                   | 95                       | 0.19                | 80                        | 0.16                 | lb/bdt material |
| 1, 3, 9          | Pneumatically convey material <sup>6</sup> through cyclone to bin. Exhaust routed through baghouse.                                                                                                                                                                                                                                            | 0.001                                                 | 99.5                     | 0.000995            | 99                        | 0.00099              | lb/bdt material |
| 1, 3, 9          | Pneumatically convey material <sup>6</sup> into target box                                                                                                                                                                                                                                                                                     | 0.1                                                   | 85                       | 0.085               | 50                        | 0.05                 | lb/bdt material |
| 1, 2, 10         | Wind Erosion of Pile                                                                                                                                                                                                                                                                                                                           | 0.38                                                  | 50                       | 0.19                | 25                        | 0.095                | ton/acre-yr     |
| 1, 2, 11         | Paved Roads                                                                                                                                                                                                                                                                                                                                    | Emission factors based upon site-specific parameters. |                          |                     |                           |                      | lb/VMT          |
| 1, 2, 12         | Unpaved Roads                                                                                                                                                                                                                                                                                                                                  | Emission factors based upon site-specific parameters. |                          |                     |                           |                      | lb/VMT          |

**Acronyms**

bdt: bone dry ton  
mbf: 1000 board foot lumber  
VMT: vehicle mile traveled

<sup>1</sup> If any activity occurs within a building, reduce the PM, PM<sub>10</sub> and PM<sub>2.5</sub> emission factor ("EF") by 100 percent (engineering judgement) as emissions struggle to escape through doorways and other openings. If an activity's by-products are evacuated pneumatically to a target box, cyclone or bag filter system, then only the associated downstream conveyance emissions are counted.

<sup>2</sup> PM refers to the CAA § 111 pollutant generally measured using EPA Reference Method 5 to determine the filterable fraction of particulate matter. "Particulate matter" is a term used to define an air pollutant that consists of a mixture of solid particles and liquid droplets found in the ambient air. PM does not include a condensable fraction.

<sup>3</sup> EF for log bucking, debarking and sawing are expressed in units of "lb/ton log" in the table above. The EF can be expressed in units of "lb/mbf" lumber as follows:

$$\text{lb/mbf} = (\text{lb PM/ton log}) \times (\text{ton/2000 lb}) \times (\text{LD lb/ft}^3) \times (\text{LRF bf lumber/ft}^3 \text{ log}) \times (1000 \text{ bf/mbf})$$

where "LD" stands for log density and "LRF" stands for log recovery factor

• LD values are species-specific and are provided by The Engineering ToolBox and are listed at [http://www.engineeringtoolbox.com/weight-wood-d\\_821.html](http://www.engineeringtoolbox.com/weight-wood-d_821.html)

• LRF value of 6.33 bf/ft<sup>3</sup> log is specific to softwood species of the Pacific Coast East. See Section 2 of Appendix D to Forest Products Measurements and Conversion Factors with Special Emphasis on the U.S. Pacific Northwest. College of Forest Resources, University of Washington. 1994. See [http://www.ruraltech.org/projects/conversions/briggs\\_conversions/briggs\\_append2/appendix02\\_combined.pdf](http://www.ruraltech.org/projects/conversions/briggs_conversions/briggs_append2/appendix02_combined.pdf)

<sup>4</sup> Douglas Fir, Engelmann Spruce, Larch, Lodgepole Pine, Ponderosa Pine and Western White Pine

<sup>5</sup> White Fir, Western Hemlock and Western Red Cedar

<sup>6</sup> The "material" in this entry refers to bark, hogged fuel, green chips, dry chips, green sawdust, dry sawdust, shavings and any other woody by-product of lumber production.

| No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | EF Reference                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|--------|---------------|---------------|-----------------------------------|-----------------------------------|----|------|--------|--------|---------|---------|------------------|------|---------|-------------------|-------|---------|
| 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Although this activity may be subject to the FARR visible emissions limit of 20% opacity (40 CFR § 124(d)), the limit was not further considered in deriving an emission factor due to the lack of a correlation between opacity and particulate matter emissions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
| 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Although this activity may be subject to the FARR requirements for limiting fugitive particulate matter emissions (40 CFR §126), those requirements were not further considered in deriving an emission factor due to lack of a correlation between compliance with requirements and particulate matter emissions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
| 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Although this activity may be subject to the FARR stack PM emission limit of 0.1 gr/dscf (40 CFR § 125(d)(3)), that limit was not further considered in deriving an emission factor because the resultant PTE would be unrealistically high.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
| 4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | For PM, PM <sub>10</sub> , and PM <sub>2.5</sub> EF, apply engineering judgement to estimate that log bucking emissions are one-tenth sawing emissions. EPA has stated that log bucking is normally a negligible source of fugitive PM emissions. See page 2-125 of Assessment of Fugitive Particulate Emission Factor for Industrial Processes, EPA-450/3-78-107, September 1978. The document can be downloaded from internet at <a href="http://nepis.epa.gov/Simple.html">http://nepis.epa.gov/Simple.html</a> by entering EPA publication number. For sawing emissions details, see Reference No. 3 below.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
| 5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <ul style="list-style-type: none"><li>For PM EF, see Table 2-47 of Assessment of Fugitive Particulate Emission Factor for Industrial Processes, EPA-450/3-78-107, September 1978. See also Table 2-59 of Technical Guidance for Controls of Industrial Process Fugitive Particulate Emissions, EPA-450/3-77-010, March 1977. Both documents can be downloaded from internet at <a href="http://nepis.epa.gov/Simple.html">http://nepis.epa.gov/Simple.html</a> by entering EPA publication number. EPA revoked the PM EF from WebFIRE on January 1, 2002. See detailed search results for SCC 3-07-008-01 (include revoked factors) at <a href="http://cfpub.epa.gov/webfire/index.cfm?action=fire.detailedSearch">http://cfpub.epa.gov/webfire/index.cfm?action=fire.detailedSearch</a></li><li>For PM<sub>10</sub> and PM<sub>2.5</sub> EF, apply engineering judgement to estimate that (a) PM<sub>10</sub> emissions are one-half PM emissions and (b) PM<sub>2.5</sub> emissions are one-half PM<sub>10</sub> emissions.</li></ul>                                                                                                                                                                                                                                                                                                              |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
| 6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <ul style="list-style-type: none"><li>Sawing consists of the following cumulative activities: breaking the log into cants and flitches with a smooth edge, breaking cant further down into multiple flitches and/or boards, taking the flitch and trim off all irregular edges to leave four-sided lumber and trimming to square the ends.</li><li>For PM EF, see Table 2-47 of Assessment of Fugitive Particulate Emission Factor for Industrial Processes, EPA-450/3-78-107, September 1978. See also Table 2-59 of Technical Guidance for Controls of Industrial Process Fugitive Particulate Emissions, EPA-450/3-77-010, March 1977. Both documents can be downloaded from internet at <a href="http://nepis.epa.gov/Simple.html">http://nepis.epa.gov/Simple.html</a> by entering EPA publication number. EPA revoked the PM EF from WebFIRE on January 1, 2002. See detailed search results for SCC 3-07-008-01 (include revoked factors) at <a href="http://cfpub.epa.gov/webfire/index.cfm?action=fire.detailedSearch">http://cfpub.epa.gov/webfire/index.cfm?action=fire.detailedSearch</a></li><li>For PM<sub>10</sub> and PM<sub>2.5</sub> EF, apply engineering judgement to estimate that (a) PM<sub>10</sub> emissions are one-half PM emissions and (b) PM<sub>2.5</sub> emissions are one-half PM<sub>10</sub> emissions.</li></ul> |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
| 7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <ul style="list-style-type: none"><li>For PM EF, see ODEQ ACDP Application Guidance AQ-EF02 (4/25/00). Douglas fir is a resinous softwood species and western hemlock is a non-resinous softwood species.</li><li>For PM<sub>10</sub> and PM<sub>2.5</sub> EF, apply engineering judgement to estimate that all PM emitted is organic aerosols and fully PM<sub>10</sub> and PM<sub>2.5</sub> emissions.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
| 8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <ul style="list-style-type: none"><li>See Section 13.2.4 of EPA's AP-42, November 2006 at <a href="http://www.epa.gov/ttn/chief/ap42/ch13/final/c13s0204.pdf">http://www.epa.gov/ttn/chief/ap42/ch13/final/c13s0204.pdf</a>. Apply Equation 1 on page 13.2.4-4 to estimate emissions resulting from material drops as follows: <math>E [\text{lb PM/ton}] = (k) \times (0.0032) \times (U/5)^{1.3} / (M/2)^{1.4}</math></li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <u>Wet Material Drop</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <table><tr><th>Particulate</th><th>k</th><th>0.0032</th><th><math>(U/5)^{1.3}</math></th><th><math>(M/2)^{1.4}</math></th><th><math>\frac{\text{lb PM}}{\text{ton}}</math></th></tr><tr><td>PM</td><td>0.74</td><td rowspan="3">0.0032</td><td rowspan="3">6.6693</td><td rowspan="3">21.0552</td><td>0.00075</td></tr><tr><td>PM<sub>10</sub></td><td>0.35</td><td>0.00035</td></tr><tr><td>PM<sub>2.5</sub></td><td>0.053</td><td>0.00005</td></tr></table>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Particulate | k      | 0.0032        | $(U/5)^{1.3}$ | $(M/2)^{1.4}$                     | $\frac{\text{lb PM}}{\text{ton}}$ | PM | 0.74 | 0.0032 | 6.6693 | 21.0552 | 0.00075 | PM <sub>10</sub> | 0.35 | 0.00035 | PM <sub>2.5</sub> | 0.053 | 0.00005 |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Particulate                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | k           | 0.0032 | $(U/5)^{1.3}$ | $(M/2)^{1.4}$ | $\frac{\text{lb PM}}{\text{ton}}$ |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | PM                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 0.74        | 0.0032 | 6.6693        | 21.0552       | 0.00075                           |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | PM <sub>10</sub>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 0.35        |        |               |               | 0.00035                           |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | PM <sub>2.5</sub>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 0.053       |        |               |               | 0.00005                           |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | The following conservative assumptions were made in applying Equation 1:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Mean wind speed (U) = 15 miles per hour                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | $(U/5)^{1.3} = 6.66930$                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
| Material moisture content (M) = 34 percent. Value based upon observations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
| $(M/2)^{1.4} = 21.05520$                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
| Note: • Mean wind speed of 15 mph is a reasonable upper bounder estimate.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
| <ul style="list-style-type: none"><li>Moisture content of 34 percent for "wet" material is based upon observation that average moisture content (dry basis) of green douglas fir lumber (common to the Pacific Northwest) is 51 percent as recorded prior to lab scale kiln VOC emissions testing conducting by Oregon State University's Mike Milota and organized in Microsoft Excel workbook entitled, "EPA Region 10 HAP and VOC Emission Factors for Lumber Drying, December 2012." 51 percent moisture content (dry basis) is equivalent to 34 percent moisture content (wet basis) as illustrated below:</li></ul> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
| MCD = MCW / (1-MCW); where                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
| MCD: moisture content dry basis                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
| MCW: moisture content wet basis                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
| 0.51 = MCW / (1 - MCW)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
| 0.51 - (0.51)(MCW) = MCW                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
| (1.51)(MCW) = 0.51                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |
| MCW = 0.34, or 34 percent                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |             |        |               |               |                                   |                                   |    |      |        |        |         |         |                  |      |         |                   |       |         |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                 |        |                         |                                      |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|--------|-------------------------|--------------------------------------|
| <u>Dry Material Drop</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                 |        |                         |                                      |
| Particulate                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | k                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | $\frac{1}{U^2}$ | 0.0032 | $\frac{1}{(U/5)^{1.3}}$ | $\frac{1}{(M/2)^{1.4}}$ lb PM<br>ton |
| PM                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 0.74                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                 |        |                         | 0.0015                               |
| PM <sub>10</sub>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 0.35                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 0.0032          | 6.6693 | 10.5552                 | 0.0007                               |
| PM <sub>2.5</sub>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 0.053                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                 |        |                         | 0.0001                               |
| <p>The following conservative assumptions were made in applying Equation 1:</p> <p>Mean wind speed (U) = 15 miles per hour<br/> <math>(U/5)^{1.3} = 6.6693</math></p> <p>Material moisture content (M) = 13 percent<br/> <math>(M/2)^{1.4} = 10.5552</math></p> <p>Note: • Mean wind speed of 15 mph is a reasonable upper bounder estimate.<br/>         • Moisture content of 13 percent for "dry" material is based upon observation that typical moisture content (dry basis) of kiln-dried lumber is 15 percent as recorded during lab scale kiln emissions testing conducting by Oregon State University's Mike Milota and organized in Microsoft Excel workbook entitled, "EPA Region 10 HAP and VOC Emission Factors for Lumber Drying, December 2012." 15 percent moisture content (dry basis) is equivalent to 13 percent moisture content (wet basis) as illustrated below:</p> <p>MCD = MCW / (1-MCW); where<br/>         MCD: moisture content dry basis<br/>         MCW: moisture content wet basis</p> <p><math>0.15 = MCW / (1 - MCW)</math><br/> <math>0.15 - (0.15)(MCW) = MCW</math><br/> <math>(1.15)(MCW) = 0.15</math><br/> <math>MCW = 0.13</math>, or 13 percent</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                 |        |                         |                                      |
| 9                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <ul style="list-style-type: none"> <li>For PM EF, see Oregon Department of Environmental Quality (ODEQ) Wood Products Emission Factors, AQ-EF02 Revised 08/01/11. <a href="http://www.deq.state.or.us/aq/permit/acdp/docs/AQ-EF02.pdf">http://www.deq.state.or.us/aq/permit/acdp/docs/AQ-EF02.pdf</a></li> <li>For PM<sub>10</sub> and PM<sub>2.5</sub> EF, see ODEQ Wood Products Emission Factors - PM<sub>10</sub>/PM<sub>2.5</sub> Fractions, AQ-EF03 Revised 08/01/11. <a href="http://www.deq.state.or.us/aq/permit/acdp/docs/AQ-EF03.pdf">http://www.deq.state.or.us/aq/permit/acdp/docs/AQ-EF03.pdf</a></li> </ul> |                 |        |                         |                                      |
| 10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>For PM EF, see last row of Table 11.9-4 on page 11.9-11 of Section 11.9 of EPA's AP-42, July 1998 at <a href="http://www.epa.gov/ttn/chieff/ap42/ch11/final/c11s09.pdf">http://www.epa.gov/ttn/chieff/ap42/ch11/final/c11s09.pdf</a>.</li> <li>For PM<sub>10</sub> and PM<sub>2.5</sub> EF, apply engineering judgement to estimate that (a) PM<sub>10</sub> emissions are one-half PM emissions and (b) PM<sub>2.5</sub> emissions are one-half PM<sub>10</sub> emissions.</li> </ul>                                                                                              |                 |        |                         |                                      |
| 11                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | See Equation 1 on page 13.2.1-4 of Chapter 13.2.1 of AP-42, January 2011 at <a href="http://www.epa.gov/ttn/chieff/ap42/ch13/final/c13s0201.pdf">http://www.epa.gov/ttn/chieff/ap42/ch13/final/c13s0201.pdf</a>                                                                                                                                                                                                                                                                                                                                                                                                            |                 |        |                         |                                      |
| 12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | See Equation 1a on page 13.2.2-4 of Chapter 13.2.2 of AP-42, November 2006 at <a href="http://www.epa.gov/ttn/chieff/ap42/ch13/final/c13s0204.pdf">http://www.epa.gov/ttn/chieff/ap42/ch13/final/c13s0204.pdf</a>                                                                                                                                                                                                                                                                                                                                                                                                          |                 |        |                         |                                      |

Table C-4 - Raw Material Received - Storage Piles

| Emission Point ID | Point or Fugitive | Emission Source | Throughput <sup>1</sup><br>(short tons/year) | Size of Storage Pile <sup>2</sup><br>(acre) | PM Emission Factor <sup>3</sup><br>(ton/acre-year) | PM10 Emission Factor <sup>3</sup><br>(ton/acre-year) | PM2.5 Emission Factor <sup>3</sup><br>(ton/acre-year) | PM<br>(ton/year) | PM <sub>10</sub><br>(ton/year) | PM <sub>2.5</sub><br>(ton/year) |
|-------------------|-------------------|-----------------|----------------------------------------------|---------------------------------------------|----------------------------------------------------|------------------------------------------------------|-------------------------------------------------------|------------------|--------------------------------|---------------------------------|
| SP-01             | Fugitive          | White Wood      | 367333                                       | 1.7                                         | 0.38                                               | 0.19                                                 | 0.095                                                 | 0.65             | 0.32                           | 0.16                            |
| SP-02             | Fugitive          | Chips           | 411413                                       | 1.7                                         | 0.38                                               | 0.19                                                 | 0.095                                                 | 0.65             | 0.32                           | 0.16                            |
| SP-03             | Fugitive          | Bark (Hog Fuel) | 242440                                       | 1.7                                         | 0.38                                               | 0.19                                                 | 0.095                                                 | 0.65             | 0.32                           | 0.16                            |

1. Throughput rates based on client-provided mass balance.
2. Assumed individual storage pile size of 1.7 acres based on client information.
3. PM emission factors from USEPA Memo "Particulate Matter Potential to Emit Emission Factors for Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest Indian Country," May 8, 2014.

Table C-5 - Vehicle Traffic - Haul Trucks (VEH-01)

**Emission Factors**

Equation 1a from AP-42 Section 13.2.2

$$E = k \times \left(\frac{s}{12}\right)^a \times \left(\frac{W}{3}\right)^b$$

|        |      |       |
|--------|------|-------|
| kPM30  | 4.9  | lb/MT |
| kPM10  | 1.5  | lb/MT |
| kPM2.5 | 0.15 | lb/MT |
| s      | 8.4  | %     |
| WE     | 11.3 |       |
| WF     | 44.0 |       |
| a      | 0.9  |       |
| a      | 0.7  |       |
| b      | 0.45 |       |
| P      | 180  | days  |

Equation 2 from AP-42 Section 13.2.2

$$E_{ext} = E \times [(365 - P)/365]$$

from AP-42 Table 13.2.2-2, assumed equivalent to total suspended particulate

from AP-42 Table 13.2.2-2

from AP-42 Table 13.2.2-2

from AP-42 Table 13.2.2-1, mean for Lumber sawmills

estimate from client info

client info for GVWR with possum belly trailers

for PM10 &amp; PM2.5, from AP-42 Table 13.2.2-2

for PM30, from AP-42 Table 13.2.2-2

from AP-42 Table 13.2.2-2

number of days with  $\geq 0.01$  inch of precipitation, AP-42 Figure 13.2.2-1

|     |    |
|-----|----|
| 85% | CE |
|-----|----|

Control efficiency applied from control measures: 10 mph speed limit, regular wet suppression, pickup broom truck. Source: WRAP Fugitive Dust Handbook (2006), Executive Summary Table, Page 3.

[R110344-02 \(wrapair.org\)](http://R110344-02.wrapair.org)**Emission Factor E without natural mitigation**

|              |       |       |
|--------------|-------|-------|
| EPM_empty    | 6.94  | lb/MT |
| EPM10_empty  | 1.98  | lb/MT |
| EPM2.5_empty | 0.20  | lb/MT |
| EPM_full     | 11.90 | lb/MT |
| EPM10_full   | 3.64  | lb/MT |
| EPM2.5_full  | 0.36  | lb/MT |

**Emission Factor E<sub>ext</sub> with natural mitigation**

|                 |      |       |
|-----------------|------|-------|
| EextPM_empty    | 3.52 | lb/MT |
| EextPM10_empty  | 1.00 | lb/MT |
| EextPM2.5_empty | 0.10 | lb/MT |
| EextPM_full     | 6.03 | lb/MT |
| EextPM10_full   | 1.85 | lb/MT |
| EextPM2.5_full  | 0.18 | lb/MT |

**Emission Estimates****Annual Emissions**

| Delivery/Export Area | Annual Loads | Onsite Trip Length* |             | Onsite Trip Length |              | PM Emissions   |               | PM10 Emissions |               | PM2.5 Emissions |               |
|----------------------|--------------|---------------------|-------------|--------------------|--------------|----------------|---------------|----------------|---------------|-----------------|---------------|
|                      |              | Entering (m)        | Exiting (m) | Entering (mi)      | Exiting (mi) | Entering (tpy) | Exiting (tpy) | Entering (tpy) | Exiting (tpy) | Entering (tpy)  | Exiting (tpy) |
| White Wood Storage   | 16688        | 656.2               | 793.9       | 0.408              | 0.493        | 3.079          | 2.173         | 0.942          | 0.619         | 0.094           | 0.062         |
| Ground Chips Storage | 9242         | 618                 | 833         | 0.384              | 0.518        | 1.606          | 1.262         | 0.492          | 0.360         | 0.049           | 0.036         |
| Bark Storage         | 7364         | 545.3               | 916.6       | 0.339              | 0.570        | 1.129          | 1.107         | 0.346          | 0.316         | 0.035           | 0.032         |
| Product Loadout      | 980          | 273.3               | 489.3       | 0.339              | 0.570        | 0.088          | 0.252         | 0.025          | 0.077         | 0.002           | 0.008         |

\*Source length generated in Lake's AERMOD View TM

Product Loadout annual loads estimated based on 32,000 tons of pellets and average SGT/load values

**Max Daily Emissions (based on 5 day a week)**

| Delivery/Export Area | Max Daily Loads | Onsite Trip Length* |             | Onsite Trip Length |              | PM Emissions   |               | PM10 Emissions |               | PM2.5 Emissions |               |
|----------------------|-----------------|---------------------|-------------|--------------------|--------------|----------------|---------------|----------------|---------------|-----------------|---------------|
|                      |                 | Entering (m)        | Exiting (m) | Entering (mi)      | Exiting (mi) | Entering (ppd) | Exiting (ppd) | Entering (ppd) | Exiting (ppd) | Entering (ppd)  | Exiting (ppd) |
| White Wood Storage   | 64              | 656.2               | 793.9       | 0.408              | 0.493        | 23.61          | 16.66         | 7.23           | 4.75          | 0.72            | 0.48          |
| Ground Chips Storage | 36              | 618                 | 833         | 0.384              | 0.518        | 12.51          | 9.84          | 3.83           | 2.80          | 0.38            | 0.28          |
| Bark Storage         | 28              | 545.3               | 916.6       | 0.339              | 0.570        | 8.59           | 8.42          | 2.63           | 2.40          | 0.26            | 0.24          |
| Product Loadout      | 10              | 273.3               | 489.3       | 0.339              | 0.570        | 3.07           | 3.01          | 0.94           | 0.86          | 0.09            | 0.09          |

\*Source length generated in Lake's AERMOD View TM

Product Loadout daily loads estimated based on 10 trucks per day proposed limitation and average SGT/load values

**Emissions Totals With Natural Mitigation and Wet Suppression**

| Pollutant | Annual (tpy) | Max Daily (ppd) |
|-----------|--------------|-----------------|
| PM        | 10.70        | 85.70           |
| PM10      | 3.18         | 25.43           |
| PM2.5     | 0.32         | 2.54            |

**Truck Traffic Flow and Traffic (7 Days Per week)**

| Combined Feedstock | Annual SGT | SGT/ Load | Annual Loads | Loads per Week | Loads per Day | Ave Loads Per Hour | OP Hours | Load Every # Minute | Combined Feedstock | Figure Names    |
|--------------------|------------|-----------|--------------|----------------|---------------|--------------------|----------|---------------------|--------------------|-----------------|
| Slash              | 305,000    | 33        | 9242         | 178            | 36            | 3                  | 12       | 20.0                | Slash              | Match           |
| Mill Resid         | 534,000    | 32        | 16688        | 321            | 46            | 3                  | 18       | 23.6                | Mill Residuals     | Ground Chips    |
| Hog Fuel           | 243,000    | 33        | 7364         | 142            | 20            | 1                  | 18       | 53.4                | Hog Fuel           | White wood Bark |
| Total              | 1,082,000  |           | 25930        | 499            | 102           | 7                  |          | 9.0                 | Combined           |                 |

**Truck Traffic Flow and Traffic (5 Days Per Week)**

| Combined Feedstock | Annual SGT | SGT/ Load | Annual Loads | Loads per Week | Loads per Day | Ave Loads Per Hour | OP Hours | Load Every # Minute | Combined Feedstock | Figure Names    |
|--------------------|------------|-----------|--------------|----------------|---------------|--------------------|----------|---------------------|--------------------|-----------------|
| Slash              | 305,000    | 33        | 9242         | 178            | 36            | 3                  | 12       | 20.0                | Slash              | Match           |
| Mill Resid         | 534,000    | 32        | 16688        | 321            | 64            | 4                  | 18       | 16.8                | Mill Residuals     | Ground Chips    |
| Hog Fuel           | 243,000    | 33        | 7364         | 142            | 28            | 2                  | 18       | 38.1                | Hog Fuel           | White wood Bark |
| Total              | 1,082,000  |           | 25930        | 499            | 128           | 8                  |          | 7.4                 | Combined           |                 |

Table C-6 - Vehicle Traffic - Front End Loader (VEH-02)

Assumptions: Client indicates FEL with 10-12 yd<sup>3</sup> capacity so CAT 950M data used as representative[950M Wheel Loader](#) | [Cat](#) | [Caterpillar](#)**Emission Factors**

Equation 1a from AP-42 Section 13.2.2

$$E = k \times \left(\frac{s}{12}\right)^a \times \left(\frac{W}{3}\right)^b$$

|        |      |        |                                                                              |
|--------|------|--------|------------------------------------------------------------------------------|
| kPM30  | 4.9  | lb/VMT | from AP-42 Table 13.2.2-2, assumed equivalent to total suspended particulate |
| kPM10  | 1.5  | lb/VMT | from AP-42 Table 13.2.2-2                                                    |
| kPM2.5 | 0.15 | lb/VMT | from AP-42 Table 13.2.2-2                                                    |
| s      | 8.4  | %      | from AP-42 Table 13.2.2-1, mean for Lumber sawmills                          |
| WE     | 26   | tons   | Front End Loader Empty Bucket Weight                                         |
| WF     | 29   | tons   | Front End Loader Full Bucket Weight                                          |
| a      | 0.9  |        | for PM10 & PM2.5, from AP-42 Table 13.2.2-2                                  |
| a      | 0.7  |        | for PM30, from AP-42 Table 13.2.2-2                                          |
| b      | 0.45 |        | from AP-42 Table 13.2.2-2                                                    |
| P      | 180  | days   | number of days with ≥0.01 inch of precipitation, AP-42 Figure 13.2.2-1       |

Equation 2 from AP-42 Section 13.2.2

$$E_{ext} = E \times [(365 - P)/365]$$

|     |                 |                                                                                                                                                                                                 |
|-----|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 85% | CE              | Control efficiency applied from control measures: 10 mph speed limit, regular wet suppression, pickup broom truck. Source: WRAP Fugitive Dust Handbook (2006), Executive Summary Table, Page 3. |
| 10  | yd <sup>3</sup> | estimated FEL bucket capacity                                                                                                                                                                   |
| 3   | tons            | estimated weight per bucket load                                                                                                                                                                |

**Emission Factor E without natural mitigation**

|              |       |        |
|--------------|-------|--------|
| EPM_empty    | 10.12 | lb/VMT |
| EPM10_empty  | 2.88  | lb/VMT |
| EPM2.5_empty | 0.29  | lb/VMT |
| EPM_full     | 9.89  | lb/VMT |
| EPM10_full   | 3.03  | lb/VMT |
| EPM2.5_full  | 0.30  | lb/VMT |

**Emission Factor E<sub>ext</sub> with natural mitigation**

|                 |      |        |
|-----------------|------|--------|
| EextPM_empty    | 5.13 | lb/VMT |
| EextPM10_empty  | 1.46 | lb/VMT |
| EextPM2.5_empty | 0.15 | lb/VMT |
| EextPM_full     | 5.01 | lb/VMT |
| EextPM10_full   | 1.53 | lb/VMT |
| EextPM2.5_full  | 0.15 | lb/VMT |

**Emission Estimates****Annual Emissions**

| Delivery Area        | Annual Loads | Onsite Trip Length* |           | Onsite Trip Length |            | PM Emissions |             | PM10 Emissions |             | PM2.5 Emissions |             |
|----------------------|--------------|---------------------|-----------|--------------------|------------|--------------|-------------|----------------|-------------|-----------------|-------------|
|                      |              | Full (m)            | Empty (m) | Full (mi)          | Empty (mi) | Full (tpy)   | Empty (tpy) | Full (tpy)     | Empty (tpy) | Full (tpy)      | Empty (tpy) |
| White Wood Storage   | 178000       | 148                 | 86        | 0.092              | 0.053      | 6.161        | 3.660       | 1.886          | 1.043       | 0.189           | 0.104       |
| Ground Chips Storage | 101667       | 130                 | 64        | 0.081              | 0.039      | 3.079        | 1.544       | 0.943          | 0.440       | 0.094           | 0.044       |
| Bark Storage         | 81000        | 124                 | 46        | 0.077              | 0.029      | 2.353        | 0.897       | 0.720          | 0.256       | 0.072           | 0.026       |

\*Source length estimated from facility diagram

**Max Daily Emissions (based on 5 day a week)**

| Delivery Area        | Max Daily Loads | Onsite Trip Length* |           | Onsite Trip Length |            | PM Emissions |             | PM10 Emissions |             | PM2.5 Emissions |             |
|----------------------|-----------------|---------------------|-----------|--------------------|------------|--------------|-------------|----------------|-------------|-----------------|-------------|
|                      |                 | Full (m)            | Empty (m) | Full (mi)          | Empty (mi) | Full (ppd)   | Empty (ppd) | Full (ppd)     | Empty (ppd) | Full (ppd)      | Empty (ppd) |
| White Wood Storage   | 685             | 148                 | 86        | 0.092              | 0.053      | 47.39        | 28.15       | 14.51          | 8.03        | 1.45            | 0.80        |
| Ground Chips Storage | 391             | 130                 | 64        | 0.081              | 0.039      | 23.68        | 11.88       | 7.25           | 3.38        | 0.73            | 0.34        |
| Bark Storage         | 312             | 124                 | 46        | 0.077              | 0.029      | 18.10        | 6.90        | 5.54           | 1.97        | 0.55            | 0.20        |

\*Source length estimated from facility diagram

**Emissions Totals With Natural Mitigation and Wet Suppression**

| Pollutant | Annual (tpy) | Max Daily (ppd) |
|-----------|--------------|-----------------|
| PM        | 17.69        | 136.10          |
| PM10      | 5.29         | 40.68           |
| PM2.5     | 0.53         | 4.07            |

**FEL Traffic Flow and Traffic (7 Days Per week)**

| Combined Feedstock | Annual SGT | SGT/ Load | Annual Loads | Loads per Week | Loads per Day | Ave Loads Per Hour | OP Hours | Load Every # Minute | Combined Feedstock | Figure Names |
|--------------------|------------|-----------|--------------|----------------|---------------|--------------------|----------|---------------------|--------------------|--------------|
| Slash              | 305,000    | 3         | 101667       | 1955           | 279           | 23                 | 12       | 2.6                 | Slash              | Match        |
| Mill Resid         | 534,000    | 3         | 178000       | 3423           | 489           | 27                 | 18       | 2.2                 | Mill               | Ground       |
| Hog Fuel           | 243,000    | 3         | 81000        | 1558           | 223           | 12                 | 18       | 4.9                 | Residuals          | Chips        |
| Total              | 1,082,000  |           | 360667       | 6936           | 991           | 63                 |          | 10                  | Hog Fuel           | White wood   |
|                    |            |           |              |                |               |                    |          |                     | Combined           | Bark         |

**FEL Traffic Flow and Traffic (5 Days Per Week)**

| Combined Feedstock | Annual SGT | SGT/ Load | Annual Loads | Loads per Week | Loads per Day | Ave Loads Per Hour | OP Hours | Load Every # Minute | Combined Feedstock | Figure Names |
|--------------------|------------|-----------|--------------|----------------|---------------|--------------------|----------|---------------------|--------------------|--------------|
| Slash              | 305,000    | 3         | 101667       | 1955           | 391           | 33                 | 12       | 1.8                 | Slash              | Match        |
| Mill Resid         | 534,000    | 3         | 178000       | 3423           | 685           | 38                 | 18       | 1.6                 | Mill               | Ground       |
| Hog Fuel           | 243,000    | 3         | 81000        | 1558           | 312           | 17                 | 18       | 3.5                 | Residuals          | Chips        |
| Total              | 1,082,000  |           | 360667       | 6936           | 1387          | 88                 |          | 7                   | Hog Fuel           | White wood   |
|                    |            |           |              |                |               |                    |          |                     | Combined           | Bark         |

| Input Material Densities | kg/m <sup>3</sup> | ton/yd <sup>3</sup> |
|--------------------------|-------------------|---------------------|
| White Wood               | 350               | 0.294               |
| Ground Chips             | 350               | 0.294               |
| Bark                     | 305               | 0.256               |

1 kg --> 0.0011 ston  
 1 m<sup>3</sup> --> 1.308 yd<sup>3</sup>  
 Densities provided by client/vendor



Table C-7 - Vendor Rates and Calculated Particle Size Distribution for Filterable Particulate Matter

| Emission Point ID | Point or Fugitive | Emission Source                         | Control Device                    | Potential Operation (hours/year) | Flow rate <sup>1</sup> |        | Grain Loading <sup>1</sup> |         | PM <sup>1</sup> | PM <sub>10</sub> | PM <sub>2.5</sub> |
|-------------------|-------------------|-----------------------------------------|-----------------------------------|----------------------------------|------------------------|--------|----------------------------|---------|-----------------|------------------|-------------------|
|                   |                   |                                         |                                   |                                  | Nm <sup>3</sup> /h     | (cfm)  | mg/Nm <sup>3</sup>         | (gr/cf) | (ton/year)      | (ton/year)       | (ton/year)        |
| EP-01             | Point             | Chip Cleaning Line                      | Cyclone <sup>2</sup>              | 8760                             | 61740                  | 36334  | 50                         | 0.022   | 29.81           | 7.45             | 1.27              |
| EP-02             | Point             | Wet Hammer Mill 1                       | Cyclone <sup>2</sup>              | 8760                             | 17364                  | 10219  | 50                         | 0.022   | 8.38            | 2.10             | 0.36              |
| EP-03             | Point             | Wet Hammer Mill 2                       | Cyclone <sup>2</sup>              | 8760                             | 17364                  | 10219  | 50                         | 0.022   | 8.38            | 2.10             | 0.36              |
| EP-04             | Point             | Drying Line                             | Cyclone, WESP, RTO <sup>3</sup>   | 8760                             | 175410                 | 103229 | 20                         | 0.009   | 33.88           | 33.88            | 33.88             |
| EP-05             | Point             | Dry Product Intermediate Storage 1      | Filter <sup>3</sup>               | 8760                             | 1447                   | 852    | 5                          | 0.002   | 0.07            | 0.07             | 0.07              |
| EP-06             | Point             | Dry Product Intermediate Storage 2      | Filter <sup>3</sup>               | 8760                             | 1447                   | 852    | 5                          | 0.002   | 0.07            | 0.07             | 0.07              |
| EP-08             | Point             | Dry Hammer Mills & Pellet Coolers       | Cyclone, Filter, RCO <sup>3</sup> | 8760                             | 169576                 | 99795  | 5                          | 0.002   | 8.19            | 8.19             | 8.19              |
| EP-09             | Point             | Milled Dry Product Intermediate Storage | Filter <sup>3</sup>               | 8760                             | 1447                   | 852    | 5                          | 0.002   | 0.07            | 0.07             | 0.07              |
| EP-10             | Point             | Pellet Storage Silo 1                   | Extractor <sup>4</sup>            | 8760                             | 26567                  | 15635  | 15                         | 0.007   | 3.85            | 2.35             | 0.89              |
| EP-11             | Point             | Pellet Storage Silo 2                   | Extractor <sup>4</sup>            | 8760                             | 26567                  | 15635  | 15                         | 0.007   | 3.85            | 2.35             | 0.89              |
| EP-12             | Point             | Pellet Storage Silo 3                   | Extractor <sup>4</sup>            | 8760                             | 26567                  | 15635  | 15                         | 0.007   | 3.85            | 2.35             | 0.89              |
| EP-13             | Point             | Pellet Storage Silo 4                   | Extractor <sup>4</sup>            | 8760                             | 26567                  | 15635  | 15                         | 0.007   | 3.85            | 2.35             | 0.89              |
| EP-14             | Point             | Pellet Storage Silo 5                   | Extractor <sup>4</sup>            | 8760                             | 26567                  | 15635  | 15                         | 0.007   | 3.85            | 2.35             | 0.89              |

1. Flow rates, grain loading factors, and PM emission rates provided by vendor in metric units, which have been converted to Imperial units.

2. For units with cyclone control only, size speciation based on EPA AP42 Chapter 9.9, Table 9.9.1-1 footnote for Grain Cleaning/Internal Vibrating with cyclone control, where PM<sub>10</sub> = 25% of PM and PM<sub>2.5</sub> = 17% PM<sub>10</sub>.

3. Assumption of PM = PM<sub>10</sub> = PM<sub>2.5</sub> for filterable emissions.

4. Pellet Storage Silos utilize aeration fans and venting to maintain low pellet temperature. PM<sub>10</sub> and PM<sub>2.5</sub> speciation estimated based on EPA AP42 Appendix B.2, Table B.2.2, Category 7 for Grain Processing as the pellets experience some forced air flow. Category 7 Cumulative Particle Size Table indicates PM<sub>10</sub> = 61% of PM and PM<sub>2.5</sub> = 23% of PM.

## Conversions

|                      |   |     |             |       |
|----------------------|---|-----|-------------|-------|
| m <sup>3</sup> =     | 1 | --> | 35.31       | cf    |
| mg=                  | 1 | --> | 0.01543236  | grain |
| mg/Nm <sup>3</sup> = | 1 | --> | 0.000437054 | gr/cf |
| m <sup>3</sup> /hr=  | 1 | --> | 0.5885      | cfm   |
| gr=                  | 1 | --> | 0.00014286  | lb    |

Table C-8a - Drying Line Emissions (EP-04)

| Parameter               | Value    | Units    | Notes                                                  |
|-------------------------|----------|----------|--------------------------------------------------------|
| Max Annual Throughput   | 440800   | ODT/yr   | Dried product, maximum plant capacity                  |
| Max Hourly Throughput   | 51.1     | ODT/hr   | Dryer Design Rating                                    |
| Furnace Burner Capacity | 164.81   | MMBtu/hr | Burner Design Rating                                   |
| RTO Burner capacity     | 8        | MMBtu/hr | Burner Design Rating                                   |
| RTO Burner capacity     | 7.84E-03 | MMcf/hr  | Conversion from MMBtu/hr, 1020 Btu/scf NG heat content |
| Max Annual Operation    | 8760     | hr/year  | Unrestricted operation                                 |

## Vendor Design Rates for WESP/RTO Stack Emissions

| Pollutant        | Emission factor | Units | Potential Annual Emissions (TPY) |
|------------------|-----------------|-------|----------------------------------|
| PM filterable    | 7.735           | lb/hr | 33.9                             |
| PM10 filterable  | 7.735           | lb/hr | 33.9                             |
| PM2.5 filterable | 7.735           | lb/hr | 33.9                             |
| NOx              | 52              | lb/hr | 227.8                            |
| CO               | 42              | lb/hr | 184.0                            |
| VOC              | 6.575           | lb/hr | 28.8                             |

Notes:

Emission rates are based on vendor data

## Estimated Maximum Rates from Furnace and Dryer for Other Pollutants for WESP/RTO Stack

| Pollutant      | Emission factor | Units    | Potential Annual Emissions (TPY) |
|----------------|-----------------|----------|----------------------------------|
| PM condensable | 0.098           | lb/ODT   | 21.9                             |
| Methane (CH4)  | 0.013           | lb/ODT   | 2.9                              |
| SO2            | 0.025           | lb/MMBtu | 18.0                             |
| CO2            | 720             | lb/ODT   | 161149                           |

Notes:

PM condensable emission factor is from AP 42, Table 10.6.1-1, Rotary dryer, direct wood-fired, softwood, WESP/RTO, 3/02

Methane emission factor is from AP 42, Table 10.6.2-3, Rotary dryer, direct wood-fired, softwood, 6/02, with 95% control applied

SO2 emission factor is from AP 42, Table 1.6-2, Bark/Bark and Wet wood - No Control, 9/03

CO2 emission factor is from AP 42, Table 10.6.1-2, Rotary dryer, direct wood-fired, softwood, RTO, 3/02

## Estimated RTO Combustion Emissions Not Already Accounted for Above

| Pollutant           | Emission factor | Units   | Potential Annual Emissions (TPY) |
|---------------------|-----------------|---------|----------------------------------|
| SO2                 | 0.6             | lb/MMcf | 0.0                              |
| Nitrous Oxide (N2O) | 2.2             | lb/MMcf | 0.1                              |

Notes:

RTO natural gas combustion emissions are from AP 42, Table 1.4-2, 7/98

## Greenhouse Gas Emission Summary for WESP/RTO Stack

| Pollutant           | TPY    | GWP | CO2e   |
|---------------------|--------|-----|--------|
| Methane (CH4)       | 2.9    | 25  | 73     |
| Nitrous Oxide (N2O) | 0.1    | 298 | 23     |
| CO2                 | 161149 | 1   | 161149 |
| Total CO2e          |        |     | 161244 |

Notes:

Global Warming Potential (GWP) from 40 CFR 98, Subpart A, Table A-1

CO2e = emission rate multiplied by its GWP

Table C-8b - Furnace Hog-fuel Combustion Organics and Metals (EP-04)

51.1 =dryer output flowrate ODT/hr

164.81 =furnace capacity MMBtu/hr

| ODT/hr | hours/yr | CAS        | Pollutant Name               | Emission Factor | Units    | Rating | HAP? | TAP? | Control Efficiency |     | ton/yr   | lb/yr    | lb/hr    | lb/24hr  |
|--------|----------|------------|------------------------------|-----------------|----------|--------|------|------|--------------------|-----|----------|----------|----------|----------|
|        |          |            |                              |                 |          |        |      |      | 95%                | 95% |          |          |          |          |
| 51.1   | 8760     | 71-55-6    | 1,1,1-Trichloroethane        | 0.000012        | lb/ODT   | D      | Yes  | Yes  |                    | Yes | 1.34E-04 | 2.69E-01 | 3.07E-05 | 7.36E-04 |
| 51.1   | 8760     | 95-63-6    | 1,2,4-Trimethyl benzene      | 0.00009         | lb/ODT   | D      | No   | Yes  |                    | Yes | 1.01E-03 | 2.01E+00 | 2.30E-04 | 5.52E-03 |
| 51.1   | 8760     | 5779-94-2  | 2,5-Dimethyl benzaldehyde    | 0.000033        | lb/ODT   | E      | No   | No   |                    | Yes | 3.69E-04 | 7.39E-01 | 8.43E-05 | 2.02E-03 |
| 51.1   | 8760     | 13466-78-9 | 3-Carene                     | 0.076           | lb/ODT   | D      | No   | No   |                    | Yes | 8.51E-01 | 1.70E+03 | 1.94E-01 | 4.66E+00 |
| 51.1   | 8760     | 75-07-0    | Acetaldehyde *               | 0.013           | lb/ODT   | D      | Yes  | Yes  |                    | Yes | 1.45E-01 | 2.91E+02 | 3.32E-02 | 7.97E-01 |
| 51.1   | 8760     | 67-64-1    | Acetone                      | 0.084           | lb/ODT   | D      | No   | No   |                    | Yes | 9.40E-01 | 1.88E+03 | 2.15E-01 | 5.15E+00 |
| 51.1   | 8760     | 98-86-2    | Acetophenone                 | 0.000064        | lb/ODT   | D      | Yes  | No   |                    | Yes | 7.16E-04 | 1.43E+00 | 1.64E-04 | 3.92E-03 |
| 51.1   | 8760     | 107-02-8   | Acrolein *                   | 0.0045          | lb/ODT   | D      | Yes  | Yes  |                    | Yes | 5.04E-02 | 1.01E+02 | 1.15E-02 | 2.76E-01 |
| 51.1   | 8760     | 80-56-8    | Alpha-pinene                 | 0.39            | lb/ODT   | D      | No   | No   |                    | Yes | 4.36E+00 | 8.73E+03 | 9.96E-01 | 2.39E+01 |
| 51.1   | 8760     | 100-52-7   | Benzaldehyde                 | 0.0026          | lb/ODT   | E      | No   | No   |                    | Yes | 2.91E-02 | 5.82E+01 | 6.64E-03 | 1.59E-01 |
| 51.1   | 8760     | 71-43-2    | Benzene *                    | 0.00099         | lb/ODT   | D      | Yes  | Yes  |                    | Yes | 1.11E-02 | 2.22E+01 | 2.53E-03 | 6.07E-02 |
| 51.1   | 8760     | 127-91-3   | Beta-pinene                  | 0.12            | lb/ODT   | D      | No   | No   |                    | Yes | 1.34E+00 | 2.69E+03 | 3.07E-01 | 7.36E+00 |
| 51.1   | 8760     | 92-52-4    | Biphenyl *                   | 0.000039        | lb/ODT   | D      | Yes  | No   |                    | Yes | 4.36E-04 | 8.73E-01 | 9.96E-05 | 2.39E-03 |
| 51.1   | 8760     | 117-81-7   | Bis-(2-ethylhexyl phthalate) | 0.00032         | lb/ODT   | D      | Yes  | Yes  |                    | Yes | 3.58E-03 | 7.16E+00 | 8.18E-04 | 1.96E-02 |
| 51.1   | 8760     | 74-83-9    | Bromomethane *               | 0.000028        | lb/ODT   | D      | Yes  | Yes  |                    | Yes | 3.13E-04 | 6.27E-01 | 7.15E-05 | 1.72E-03 |
| 51.1   | 8760     | 123-72-8   | Butylaldehyde                | 0.0031          | lb/ODT   | E      | No   | No   |                    | Yes | 3.47E-02 | 6.94E+01 | 7.92E-03 | 1.90E-01 |
| 51.1   | 8760     | 85-68-7    | Butylbenzyl phthalate        | 0.000014        | lb/ODT   | E      | No   | No   |                    | Yes | 1.57E-04 | 3.13E-01 | 3.58E-05 | 8.58E-04 |
| 51.1   | 8760     | 75-15-0    | Carbon disulfide *           | 0.000018        | lb/ODT   | D      | Yes  | Yes  |                    | Yes | 2.01E-04 | 4.03E-01 | 4.60E-05 | 1.10E-03 |
| 51.1   | 8760     | 56-23-5    | Carbon tetrachloride *       | 0.000012        | lb/ODT   | D      | Yes  | Yes  |                    | Yes | 1.34E-04 | 2.69E-01 | 3.07E-05 | 7.36E-04 |
| 51.1   | 8760     | 74-87-3    | Chloromethane *              | 0.00011         | lb/ODT   | D      | Yes  | Yes  |                    | Yes | 1.23E-03 | 2.46E+00 | 2.81E-04 | 6.75E-03 |
| 51.1   | 8760     | 98-82-8    | Cumene *                     | 0.000069        | lb/ODT   | D      | Yes  | Yes  |                    | Yes | 7.72E-04 | 1.54E+00 | 1.76E-04 | 4.23E-03 |
| 51.1   | 8760     | 84-74-2    | Di-N-butyl phthalate         | 0.000023        | lb/ODT   | D      | Yes  | No   |                    | Yes | 2.57E-04 | 5.15E-01 | 5.88E-05 | 1.41E-03 |
| 51.1   | 8760     | 75-18-3    | Dimethyl sulfide             | 0.000014        | lb/ODT   | E      | No   | No   |                    | Yes | 1.57E-04 | 3.13E-01 | 3.58E-05 | 8.58E-04 |
| 51.1   | 8760     | 74-84-0    | Ethane                       | 0.015           | lb/ODT   | D      | No   | No   |                    | Yes | 1.68E-01 | 3.36E+02 | 3.83E-02 | 9.20E-01 |
| 51.1   | 8760     | 100-41-4   | Ethyl benzene *              | 0.0000038       | lb/ODT   | E      | Yes  | Yes  |                    | Yes | 4.25E-05 | 8.51E-02 | 9.71E-06 | 2.33E-04 |
| 51.1   | 8760     | 50-00-0    | Formaldehyde *               | 0.025           | lb/ODT   | C      | Yes  | Yes  |                    | Yes | 2.80E-01 | 5.60E+02 | 6.39E-02 | 1.53E+00 |
| 51.1   | 8760     | 66-25-1    | Hexaldehyde                  | 0.016           | lb/ODT   | E      | No   | No   |                    | Yes | 1.79E-01 | 3.58E+02 | 4.09E-02 | 9.81E-01 |
| 51.1   | 8760     | 123-31-9   | Hydroquinone                 | 0.00006         | lb/ODT   | E      | Yes  | No   |                    | Yes | 6.71E-04 | 1.34E+00 | 1.53E-04 | 3.68E-03 |
| 51.1   | 8760     | 590-86-3   | Isovaleraldehyde             | 0.00052         | lb/ODT   | E      | No   | No   |                    | Yes | 5.82E-03 | 1.16E+01 | 1.33E-03 | 3.19E-02 |
| 51.1   | 8760     | 138-86-3   | Limonene                     | 0.034           | lb/ODT   | D      | No   | No   |                    | Yes | 3.80E-01 | 7.61E+02 | 8.69E-02 | 2.08E+00 |
| 51.1   | 8760     | 1330-20-7  | m,p-Xylene                   | 0.00055         | lb/ODT   | D      | Yes  | Yes  |                    | Yes | 6.15E-03 | 1.23E+01 | 1.41E-03 | 3.37E-02 |
| 51.1   | 8760     | 620-23-5   | m-Tolualdehyde               | 0.00045         | lb/ODT   | E      | No   | No   |                    | Yes | 5.04E-03 | 1.01E+01 | 1.15E-03 | 2.76E-02 |
| 51.1   | 8760     | 64-82-8    | Methane                      | 0.26            | lb/ODT   | D      | No   | No   |                    | Yes | 2.91E+00 | 5.82E+03 | 6.64E-01 | 1.59E+01 |
| 51.1   | 8760     | 67-56-1    | Methanol *                   | 0.014           | lb/ODT   | D      | Yes  | Yes  |                    | Yes | 1.57E-01 | 3.13E+02 | 3.58E-02 | 8.58E-01 |
| 51.1   | 8760     | 78-93-3    | Methyl ethyl ketone *        | 0.0049          | lb/ODT   | D      | No   | Yes  |                    | Yes | 5.48E-02 | 1.10E+02 | 1.25E-02 | 3.00E-01 |
| 51.1   | 8760     | 108-10-1   | Methyl isobutyl ketone *     | 0.0024          | lb/ODT   | D      | Yes  | Yes  |                    | Yes | 2.69E-02 | 5.37E+01 | 6.13E-03 | 1.47E-01 |
| 51.1   | 8760     | 75-09-2    | Methylene chloride *         | 0.00063         | lb/ODT   | D      | Yes  | Yes  |                    | Yes | 7.05E-03 | 1.41E+01 | 1.61E-03 | 3.86E-02 |
| 51.1   | 8760     | 110-54-3   | n-Hexane *                   | 0.000026        | lb/ODT   | E      | Yes  | Yes  |                    | Yes | 2.91E-04 | 5.82E-01 | 6.64E-05 | 1.59E-03 |
| 51.1   | 8760     | 95-47-6    | o-Xylene *                   | 0.000014        | lb/ODT   | D      | Yes  | Yes  |                    | Yes | 1.57E-04 | 3.13E-01 | 3.58E-05 | 8.58E-04 |
| 51.1   | 8760     | 108-95-2   | Phenol *                     | 0.0066          | lb/ODT   | D      | Yes  | Yes  |                    | Yes | 7.39E-02 | 1.48E+02 | 1.69E-02 | 4.05E-01 |
| 51.1   | 8760     | 123-38-6   | Propionaldehyde *            | 0.0032          | lb/ODT   | D      | Yes  | Yes  |                    | Yes | 3.58E-02 | 7.16E+01 | 8.18E-03 | 1.96E-01 |
| 51.1   | 8760     | 100-42-5   | Styrene *                    | 0.00012         | lb/ODT   | E      | Yes  | Yes  |                    | Yes | 1.34E-03 | 2.69E+00 | 3.07E-04 | 7.36E-03 |
| 51.1   | 8760     | 108-88-3   | Toluene *                    | 0.0021          | lb/ODT   | D      | Yes  | Yes  |                    | Yes | 2.35E-02 | 4.70E+01 | 5.37E-03 | 1.29E-01 |
| 51.1   | 8760     | 110-62-3   | Valeraldehyde                | 0.0016          | lb/ODT   | E      | No   | No   |                    | Yes | 1.79E-02 | 3.58E+01 | 4.09E-03 | 9.81E-02 |
| 164.81 | 8760     | 7440-36-0  | Antimony                     | 7.90E-06        | lb/MMBtu | C      | Yes  | No   | Yes                |     | 2.85E-04 | 5.70E-01 | 6.51E-05 | 1.56E-03 |
| 164.81 | 8760     | 7440-38-2  | Arsenic                      | 2.20E-05        | lb/MMBtu | A      | Yes  | No   | Yes                |     | 7.94E-04 | 1.59E+00 | 1.81E-04 | 4.35E-03 |
| 164.81 | 8760     | 7440-39-3  | Barium                       | 1.70E-04        | lb/MMBtu | C      | No   | No   | Yes                |     | 6.14E-03 | 1.23E+01 | 1.40E-03 | 3.36E-02 |
| 164.81 | 8760     | 7440-41-7  | Beryllium                    | 1.10E-06        | lb/MMBtu | B      | Yes  | No   | Yes                |     | 3.97E-05 | 7.94E-02 | 9.06E-06 | 2.18E-04 |
| 164.81 | 8760     | 7440-43-9  | Cadmium                      | 4.10E-06        | lb/MMBtu | A      | Yes  | No   | Yes                |     | 1.48E-04 | 2.96E-01 | 3.38E-05 | 8.11E-04 |
| 164.81 | 8760     | 7440-47-3  | Chromium, total              | 2.10E-05        | lb/MMBtu | A      | Yes  | No   | Yes                |     | 7.58E-04 | 1.52E+00 | 1.73E-04 | 4.15E-03 |
| 164.81 | 8760     | CRVCOMP    | Chromium, hexavalent         | 3.50E-06        | lb/MMBtu | C      | Yes  | No   | Yes                |     | 1.26E-04 | 2.53E-01 | 2.88E-05 | 6.92E-04 |
| 164.81 | 8760     | 7440-48-4  | Cobalt                       | 6.50E-06        | lb/MMBtu | C      | Yes  | Yes  | Yes                |     | 2.35E-04 | 4.69E-01 | 5.36E-05 | 1.29E-03 |
| 164.81 | 8760     | 7440-50-8  | Copper                       | 4.90E-05        | lb/MMBtu | A      | No   | No   | Yes                |     | 1.77E-03 | 3.54E+00 | 4.04E-04 | 9.69E-03 |
| 164.81 | 8760     | 7439-89-6  | Iron                         | 9.90E-04        | lb/MMBtu | C      | No   | No   | Yes                |     | 3.57E-02 | 7.15E+01 | 8.16E-03 | 1.96E-01 |
| 164.81 | 8760     | 7439-92-1  | Lead                         | 4.80E-05        | lb/MMBtu | A      | Yes  | No   | Yes                |     | 1.73E-03 | 3.46E+00 | 3.96E-04 | 9.49E-03 |
| 164.81 | 8760     | 7439-96-5  | Manganese                    | 1.60E-03        | lb/MMBtu | A      | Yes  | No   | Yes                |     | 5.77E-02 | 1.15E+02 | 1.32E-02 | 3.16E-01 |
| 164.81 | 8760     | 7439-97-6  | Mercury                      | 3.50E-06        | lb/MMBtu | A      | Yes  | Yes  | No                 |     | 2.53E-03 | 5.05E+00 | 5.77E-04 | 1.38E-02 |
| 164.81 | 8760     | 7439-98-7  | Molybdenum                   | 2.10E-06        | lb/MMBtu | D      | No   | No   | Yes                |     | 7.58E-05 | 1.52E-01 | 1.73E-05 | 4.15E-04 |
| 164.81 | 8760     | 7440-02-0  | Nickel                       | 3.30E-05        | lb/MMBtu | A      | Yes  | No   | Yes                |     | 1.19E-03 | 2.38E+00 | 2.72E-04 | 6.53E-03 |
| 164.81 | 8760     | 7723-14-0  | Phosphorus                   | 2.70E-05        | lb/MMBtu | D      | Yes  | Yes  | Yes                |     | 9.75E-04 | 1.95E+00 | 2.22E-04 | 5.34E-03 |
| 164.81 | 8760     | 7440-09-7  | Potassium                    | 3.90E-02        | lb/MMBtu | D      | No   | No   | Yes                |     | 1.41E+00 | 2.82E+03 | 3.21E-01 | 7.71E+00 |
| 164.81 | 8760     | 7782-49-2  | Selenium                     | 2.80E-06        | lb/MMBtu | A      | Yes  | No   | Yes                |     | 1.01E-04 | 2.02E-01 | 2.31E-05 | 5.54E-04 |
| 164.81 | 8760     | 7440-22-4  | Silver                       | 1.70E-03        | lb/MMBtu | D      | No   | No   | Yes                |     | 6.14E-02 | 1.23E+02 | 1.40E-02 | 3.36E-01 |
| 164.81 | 8760     | 7440-23-5  | Sodium                       | 3.60E-04        | lb/MMBtu | D      | No   | No   | Yes                |     | 1.30E-02 | 2.60E+01 | 2.97E-03 | 7.12E-02 |
| 164.81 | 8760     | 7440-24-6  | Strontium                    | 1.00E-05        | lb/MMBtu | D      | No   | No   | Yes                |     | 3.61E-04 | 7.22E-01 | 8.24E-05 | 1.98E-03 |
| 164.81 | 8760     | 7440-31-5  | Tin                          | 2.30E-05        | lb/MMBtu | D      | No   | No   | Yes                |     | 8.30E-04 | 1.66E+00 | 1.90E-04 | 4.55E-03 |
| 164.81 | 8760     | 7440-32-6  | Titanium                     | 2.00E-05        | lb/MMBtu | D      | No   | No   | Yes                |     | 7.22E-04 | 1.44E+00 | 1.65E-04 | 3.96E-03 |
| 164.81 | 8760     | 7440-62-2  | Vanadium                     | 9.80E-07        | lb/MMBtu | D      | No   | Yes  | Yes                |     | 3.54E-05 | 7.07E-02 | 8.08E-06 | 1.94E-04 |
| 164.81 | 8760     | 7440-65-5  | Yttrium                      | 3.00E-07        | lb/MMBtu | D      | No   | No   | Yes                |     | 1.08E-05 | 2.17E-02 | 2.47E-06 | 5.93E-05 |
| 164.81 | 8760     | 7440-66-6  | Zinc                         | 4.20E-04        | lb/MMBtu | A      | No   | No   | Yes                |     | 1.52E-02 | 3.03E+01 | 3.46E-03 | 8.31E-02 |

- Organic HAP emission factors from USEPA AP-42 10.6.2, Tables 10.6.2-3 Rotary dryer, direct wood-fired, softwood
- Metal HAP emission factors from USEPA AP-42 1.6.2, Tables 1.6.2-4.
- Dryer hog-fuel burner is rated at 164.81 MMBtu/hr HHV
- 95% control/destruction efficiency for WESP/RTO based on vendor data.

Metals assumed controlled as PM by WESP (except mercury), organics controlled by RTO

Table C-8c - Dryer RTO Natural Gas Combustion Organics and Metals (EP-04)

8 =RTO MMBtu/hr

1020 Btu/Scf natural gas heating value

| MMBtu/hr | hours/yr | CAS        | Pollutant Name                 | EF based on MDL |  | Units    | Rating | HAP? | TAP? | ton/yr | lb/yr       | lb/hr      | lb/24hr    |
|----------|----------|------------|--------------------------------|-----------------|--|----------|--------|------|------|--------|-------------|------------|------------|
|          |          |            |                                | Emission Factor |  |          |        |      |      |        |             |            |            |
| 8        | 8760     | 91-57-6    | 2-Methylnaphthalene            | 0.000024        |  | lb/MMscf | D      | No   | No   | 0.00   | 0.001648941 | 1.8824E-07 | 4.5176E-06 |
| 8        | 8760     | 56-49-5    | 3-Methylcholanthrene           | 1.80E-06        |  | lb/MMscf | E      | No   | Yes  | 0.00   | 0.000123671 | 1.4118E-08 | 3.3882E-07 |
| 8        | 8760     | 57-97-6    | 7,12-Dimethylbenz(a)anthracene | 1.60E-05        |  | lb/MMscf | E      | No   | Yes  | 0.00   | 0.001099294 | 1.2549E-07 | 3.0118E-06 |
| 8        | 8760     | 83-32-9    | Acenaphthene                   | 1.80E-06        |  | lb/MMscf | E      | No   | No   | 0.00   | 0.000123671 | 1.4118E-08 | 3.3882E-07 |
| 8        | 8760     | 208-96-8   | Acenaphthylene                 | 1.80E-06        |  | lb/MMscf | E      | No   | No   | 0.00   | 0.000123671 | 1.4118E-08 | 3.3882E-07 |
| 8        | 8760     | 120-12-7   | Anthracene                     | 2.40E-06        |  | lb/MMscf | E      | No   | No   | 0.00   | 0.000164894 | 1.8824E-08 | 4.5176E-07 |
| 8        | 8760     | 56-55-3    | Benz(a)anthracene              | 1.80E-06        |  | lb/MMscf | E      | Yes  | Yes  | 0.00   | 0.000123671 | 1.4118E-08 | 3.3882E-07 |
| 8        | 8760     | 71-43-2    | Benzene                        | 0.0021          |  | lb/MMscf | B      | Yes  | Yes  | 0.00   | 0.144282353 | 1.6471E-05 | 0.00039529 |
| 8        | 8760     | 50-32-8    | Benzo(a)pyrene                 | 1.20E-06        |  | lb/MMscf | E      | Yes  | Yes  | 0.00   | 8.24471E-05 | 9.4118E-09 | 2.2588E-07 |
| 8        | 8760     | 205-99-2   | Benzo(b)fluoranthene           | 1.80E-06        |  | lb/MMscf | E      | Yes  | Yes  | 0.00   | 0.000123671 | 1.4118E-08 | 3.3882E-07 |
| 8        | 8760     | 191-24-2   | Benzo(g,h,i)perylene           | 1.20E-06        |  | lb/MMscf | E      | No   | No   | 0.00   | 8.24471E-05 | 9.4118E-09 | 2.2588E-07 |
| 8        | 8760     | 207-08-9   | Benzo(k)fluoranthene           | 1.80E-06        |  | lb/MMscf | E      | Yes  | Yes  | 0.00   | 0.000123671 | 1.4118E-08 | 3.3882E-07 |
| 8        | 8760     | 106-97-8   | Butane                         | 2.1             |  | lb/MMscf | E      | No   | No   | 0.07   | 144.2823529 | 0.01647059 | 0.39529412 |
| 8        | 8760     | 218-01-9   | Chrysene                       | 1.80E-06        |  | lb/MMscf | E      | No   | Yes  | 0.00   | 0.000123671 | 1.4118E-08 | 3.3882E-07 |
| 8        | 8760     | 53-70-3    | Dibenzo(a,h)anthracene         | 1.20E-06        |  | lb/MMscf | E      | Yes  | Yes  | 0.00   | 8.24471E-05 | 9.4118E-09 | 2.2588E-07 |
| 8        | 8760     | 25321-22-6 | Dichlorobenzene                | 0.0012          |  | lb/MMscf | E      | No   | No   | 0.00   | 0.082447059 | 9.4118E-06 | 0.00022588 |
| 8        | 8760     | 74-84-0    | Ethane                         | 3.1             |  | lb/MMscf | E      | No   | No   | 0.11   | 212.9882353 | 0.02431373 | 0.58352941 |
| 8        | 8760     | 206-44-0   | Fluoranthene                   | 0.000003        |  | lb/MMscf | E      | No   | No   | 0.00   | 0.000206118 | 2.3529E-08 | 5.6471E-07 |
| 8        | 8760     | 86-73-7    | Fluorene                       | 0.0000028       |  | lb/MMscf | E      | No   | No   | 0.00   | 0.000192376 | 2.1961E-08 | 5.2706E-07 |
| 8        | 8760     | 50-00-0    | Formaldehyde                   | 0.075           |  | lb/MMscf | B      | Yes  | Yes  | 0.00   | 5.152941176 | 0.00058824 | 0.01411765 |
| 8        | 8760     | 110-54-3   | Hexane                         | 1.8             |  | lb/MMscf | E      | Yes  | Yes  | 0.06   | 123.6705882 | 0.01411765 | 0.33882353 |
| 8        | 8760     | 193-39-5   | Indeno(1,2,3-c,d)pyrene        | 1.80E-06        |  | lb/MMscf | E      | Yes  | Yes  | 0.00   | 0.000123671 | 1.4118E-08 | 3.3882E-07 |
| 8        | 8760     | 91-20-3    | Naphthalene                    | 0.00061         |  | lb/MMscf | E      | Yes  | Yes  | 0.00   | 0.041910588 | 4.7843E-06 | 0.00011482 |
| 8        | 8760     | 109-66-0   | Pentane                        | 2.6             |  | lb/MMscf | E      | No   | No   | 0.09   | 178.6352941 | 0.02039216 | 0.48941176 |
| 8        | 8760     | 85-01-8    | Phenanthrene                   | 0.000017        |  | lb/MMscf | D      | No   | No   | 0.00   | 0.001168    | 1.3333E-07 | 0.0000032  |
| 8        | 8760     | 74-98-6    | Propane                        | 1.6             |  | lb/MMscf | E      | No   | No   | 0.05   | 109.9294118 | 0.01254902 | 0.30117647 |
| 8        | 8760     | 129-00-0   | Pyrene                         | 0.000005        |  | lb/MMscf | E      | No   | No   | 0.00   | 0.000343529 | 3.9216E-08 | 9.4118E-07 |
| 8        | 8760     | 108-88-3   | Toluene                        | 0.0034          |  | lb/MMscf | C      | Yes  | Yes  | 0.00   | 0.2336      | 2.6667E-05 | 0.00064    |
| 8        | 8760     | 7440-38-2  | Arsenic                        | 0.0002          |  | lb/MMscf | E      | Yes  | No   | 0.00   | 0.013741176 | 1.5686E-06 | 3.7647E-05 |
| 8        | 8760     | 7440-39-3  | Barium                         | 0.0044          |  | lb/MMscf | D      | No   | No   | 0.00   | 0.302305882 | 3.451E-05  | 0.00082824 |
| 8        | 8760     | 7440-41-7  | Beryllium                      | 1.20E-05        |  | lb/MMscf | E      | Yes  | No   | 0.00   | 0.000824471 | 9.4118E-08 | 2.2588E-06 |
| 8        | 8760     | 7440-43-9  | Cadmium                        | 0.0011          |  | lb/MMscf | D      | Yes  | No   | 0.00   | 0.075576471 | 8.6275E-06 | 0.00020706 |
| 8        | 8760     | 7440-47-3  | Chromium, total                | 0.0014          |  | lb/MMscf | D      | Yes  | No   | 0.00   | 0.096188235 | 1.098E-05  | 0.00026353 |
| 8        | 8760     | 7440-48-4  | Cobalt                         | 0.000084        |  | lb/MMscf | D      | Yes  | Yes  | 0.00   | 0.005771294 | 6.5882E-07 | 1.5812E-05 |
| 8        | 8760     | 7440-50-8  | Copper                         | 0.00085         |  | lb/MMscf | C      | No   | No   | 0.00   | 0.0584      | 6.6667E-06 | 0.00016    |
| 8        | 8760     | 7439-92-1  | Lead                           | 0.0005          |  | lb/MMscf | D      | Yes  | No   | 0.00   | 0.034352941 | 3.9216E-06 | 9.4118E-05 |
| 8        | 8760     | 7439-96-5  | Manganese                      | 0.00038         |  | lb/MMscf | D      | Yes  | No   | 0.00   | 0.026108235 | 2.9804E-06 | 7.1529E-05 |
| 8        | 8760     | 7439-97-6  | Mercury                        | 0.00026         |  | lb/MMscf | D      | Yes  | Yes  | 0.00   | 0.017863529 | 2.0392E-06 | 4.8941E-05 |
| 8        | 8760     | 7439-98-7  | Molybdenum                     | 0.0011          |  | lb/MMscf | D      | No   | No   | 0.00   | 0.075576471 | 8.6275E-06 | 0.00020706 |
| 8        | 8760     | 7440-02-0  | Nickel                         | 0.0021          |  | lb/MMscf | C      | Yes  | No   | 0.00   | 0.144282353 | 1.6471E-05 | 0.00039529 |
| 8        | 8760     | 7782-49-2  | Selenium                       | 2.40E-05        |  | lb/MMscf | E      | Yes  | No   | 0.00   | 0.001648941 | 1.8824E-07 | 4.5176E-06 |
| 8        | 8760     | 7440-62-2  | Vanadium                       | 0.0023          |  | lb/MMscf | D      | No   | Yes  | 0.00   | 0.158023529 | 1.8039E-05 | 0.00043294 |
| 8        | 8760     | 7440-66-6  | Zinc                           | 0.029           |  | lb/MMscf | E      | No   | No   | 0.00   | 1.992470588 | 0.00022745 | 0.00545882 |

POM

1. HAP emission factors from USEPA AP-42 1.4, Tables 1.4.1-4. [1.4 natural gas combustion.pdf \(epa.gov\)](#)
2. **Blue Cell:** CAS not identified as HAP; however, AP-42 footnote assigns as a HAP as Polycyclic Organic Matter (POM).
3. RTO burner capacity of 8 MMBtu/hr
4. Natural gas heating value 1020 Btu/scf

Table C-9a - Dry Hammermill and Pellet Cooler Combined/RCO Stack Emissions (EP-08)

| Parameter            | Value    | Units    | Notes                                                     |
|----------------------|----------|----------|-----------------------------------------------------------|
| RCO Burner capacity  | 4.5      | MMBtu/hr | Burner Design Rating                                      |
| RCO Burner capacity  | 4.41E-03 | MMcf/hr  | Conversion from MMBtu/hr, 1020 Btu/scf<br>NG heat content |
| Max Annual Operation | 8760     | hr/year  | Unrestricted operation                                    |

## Vendor Design Rates for RCO Stack Emissions

| Pollutant        | Emission factor | Units | Potential Annual Emissions (TPY) |
|------------------|-----------------|-------|----------------------------------|
| PM filterable    | 1.87            | lb/hr | 8.19                             |
| PM10 filterable  | 1.87            | lb/hr | 8.19                             |
| PM2.5 filterable | 1.87            | lb/hr | 8.19                             |
| VOC              | 8.6             | lb/hr | 37.67                            |

## Estimated RCO Combustion Emissions Not Already Accounted for Above

| Pollutant           | Emission factor | Units   | Potential Annual Emissions (TPY) |
|---------------------|-----------------|---------|----------------------------------|
| PM condensable      | 5.7             | lb/MMcf | 0.11                             |
| NOx                 | 94              | lb/MMcf | 1.82                             |
| CO                  | 40              | lb/MMcf | 0.77                             |
| SO2                 | 0.6             | lb/MMcf | 0.01                             |
| CO2                 | 120000          | lb/MMcf | 2319                             |
| Methane (CH4)       | 2.3             | lb/MMcf | 0.04                             |
| Nitrous Oxide (N2O) | 2.2             | lb/MMcf | 0.04                             |

## Notes:

PM condensable, NOx, CO, SO2, and CO2 emissions are from combustion of natural gas in RCO.

Combustion emission factors are from AP 42, Table 1.4-1, No SCC - Uncontrolled, 7/98, and Table 1.4-2

## Greenhouse Gas Emission Summary for RCO Stack

| Pollutant           | TPY  | GWP | CO2e |
|---------------------|------|-----|------|
| Methane (CH4)       | 0.0  | 25  | 1    |
| Nitrous Oxide (N2O) | 0.0  | 298 | 13   |
| CO2                 | 2319 | 1   | 2319 |
| Total CO2e          |      |     | 2333 |

## Notes:

Global Warming Potential (GWP) from 40 CFR 98, Subpart A, Table A-1

CO2e = emission rate multiplied by its GWP

Table C-9b - Dry Hammermill and Pelletizing organics  
50.3196347 =process capacity ODT/hr

| 50.3196347 =process capacity ODT/hr |          |          |                |                 |        |        |      |      | Control Efficiency<br>95% |          |          |          |          |
|-------------------------------------|----------|----------|----------------|-----------------|--------|--------|------|------|---------------------------|----------|----------|----------|----------|
| ODT/hr                              | hours/yr | CAS      | Pollutant Name | Emission Factor | Units  | Rating | HAP? | TAP? | RCO control               | ton/yr   | lb/yr    | lb/hr    | lb/24hr  |
| 50.3196347                          | 8760     | 67-64-1  | Acetone        | 6.40E-03        | lb/ODT | D      | No   | No   | Yes                       | 7.05E-02 | 1.41E+02 | 1.61E-02 | 3.86E-01 |
| 50.3196347                          | 8760     | 80-56-8  | Alpha-pinene   | 4.90E-01        | lb/ODT | D      | No   | No   | Yes                       | 5.40E+00 | 1.08E+04 | 1.23E+00 | 2.96E+01 |
| 50.3196347                          | 8760     | 127-91-3 | Beta-pinene    | 1.50E-01        | lb/ODT | D      | No   | No   | Yes                       | 1.65E+00 | 3.31E+03 | 3.77E-01 | 9.06E+00 |
| 50.3196347                          | 8760     | 67-56-1  | Methanol       | 7.30E-03        | lb/ODT | D      | Yes  | Yes  | Yes                       | 8.04E-02 | 1.61E+02 | 1.84E-02 | 4.41E-01 |
| 50.3196347                          | 8760     | 108-95-2 | Phenol         | 4.50E-03        | lb/ODT | E      | Yes  | Yes  | Yes                       | 4.96E-02 | 9.92E+01 | 1.13E-02 | 2.72E-01 |

1. Organics emission factors from USEPA AP-42 10.6.2, Table 10.6.2-7 for Hammermills. 95% control efficiency provided by RCO.

2. Process is rated at 440800 ODT/yr (50.32 ODT/hr at 8760 hours per year)

Table C-9c - Dry Hammermill and Pelletizer RCO Natural Gas Combustion Organics and Metals (EP-08)

4.5 =RCO MMBtu/hr

1020 Btu/Scf natural gas heating value

| MMBtu/hr | hours/yr | CAS        | Pollutant Name                 | EF based on MDL |  | Units    | Rating | HAP? | TAP? | ton/yr | lb/yr       | lb/hr      | lb/24hr    |
|----------|----------|------------|--------------------------------|-----------------|--|----------|--------|------|------|--------|-------------|------------|------------|
|          |          |            |                                | Emission Factor |  |          |        |      |      |        |             |            |            |
| 4.5      | 8760     | 91-57-6    | 2-Methylnaphthalene            | 0.000024        |  | lb/MMscf | D      | No   | No   | 0.00   | 0.000927529 | 1.0588E-07 | 2.5412E-06 |
| 4.5      | 8760     | 56-49-5    | 3-Methylcholanthrene           | 1.80E-06        |  | lb/MMscf | E      | No   | Yes  | 0.00   | 6.95647E-05 | 7.9412E-09 | 1.9059E-07 |
| 4.5      | 8760     | 57-97-6    | 7,12-Dimethylbenz(a)anthracene | 1.60E-05        |  | lb/MMscf | E      | No   | Yes  | 0.00   | 0.000618353 | 7.0588E-08 | 1.6941E-06 |
| 4.5      | 8760     | 83-32-9    | Acenaphthene                   | 1.80E-06        |  | lb/MMscf | E      | No   | No   | 0.00   | 6.95647E-05 | 7.9412E-09 | 1.9059E-07 |
| 4.5      | 8760     | 208-96-8   | Acenaphthylene                 | 1.80E-06        |  | lb/MMscf | E      | No   | No   | 0.00   | 6.95647E-05 | 7.9412E-09 | 1.9059E-07 |
| 4.5      | 8760     | 120-12-7   | Anthracene                     | 2.40E-06        |  | lb/MMscf | E      | No   | No   | 0.00   | 9.27529E-05 | 1.0588E-08 | 2.5412E-07 |
| 4.5      | 8760     | 56-55-3    | Benz(a)anthracene              | 1.80E-06        |  | lb/MMscf | E      | Yes  | Yes  | 0.00   | 6.95647E-05 | 7.9412E-09 | 1.9059E-07 |
| 4.5      | 8760     | 71-43-2    | Benzene                        | 0.0021          |  | lb/MMscf | B      | Yes  | Yes  | 0.00   | 0.081158824 | 9.2647E-06 | 0.00022235 |
| 4.5      | 8760     | 50-32-8    | Benzo(a)pyrene                 | 1.20E-06        |  | lb/MMscf | E      | Yes  | Yes  | 0.00   | 4.63765E-05 | 5.2941E-09 | 1.2706E-07 |
| 4.5      | 8760     | 205-99-2   | Benzo(b)fluoranthene           | 1.80E-06        |  | lb/MMscf | E      | Yes  | Yes  | 0.00   | 6.95647E-05 | 7.9412E-09 | 1.9059E-07 |
| 4.5      | 8760     | 191-24-2   | Benzo(g,h,i)perylene           | 1.20E-06        |  | lb/MMscf | E      | No   | No   | 0.00   | 4.63765E-05 | 5.2941E-09 | 1.2706E-07 |
| 4.5      | 8760     | 207-08-9   | Benzo(k)fluoranthene           | 1.80E-06        |  | lb/MMscf | E      | Yes  | Yes  | 0.00   | 6.95647E-05 | 7.9412E-09 | 1.9059E-07 |
| 4.5      | 8760     | 106-97-8   | Butane                         | 2.1             |  | lb/MMscf | E      | No   | No   | 0.04   | 81.15882353 | 0.00926471 | 0.22235294 |
| 4.5      | 8760     | 218-01-9   | Chrysene                       | 1.80E-06        |  | lb/MMscf | E      | No   | Yes  | 0.00   | 6.95647E-05 | 7.9412E-09 | 1.9059E-07 |
| 4.5      | 8760     | 53-70-3    | Dibenzo(a,h)anthracene         | 1.20E-06        |  | lb/MMscf | E      | Yes  | Yes  | 0.00   | 4.63765E-05 | 5.2941E-09 | 1.2706E-07 |
| 4.5      | 8760     | 25321-22-6 | Dichlorobenzene                | 0.0012          |  | lb/MMscf | E      | No   | No   | 0.00   | 0.046376471 | 5.2941E-06 | 0.00012706 |
| 4.5      | 8760     | 74-84-0    | Ethane                         | 3.1             |  | lb/MMscf | E      | No   | No   | 0.06   | 119.8058824 | 0.01367647 | 0.32823529 |
| 4.5      | 8760     | 206-44-0   | Fluoranthene                   | 0.000003        |  | lb/MMscf | E      | No   | No   | 0.00   | 0.000115941 | 1.3235E-08 | 3.1765E-07 |
| 4.5      | 8760     | 86-73-7    | Fluorene                       | 0.0000028       |  | lb/MMscf | E      | No   | No   | 0.00   | 0.000108212 | 1.2353E-08 | 2.9647E-07 |
| 4.5      | 8760     | 50-00-0    | Formaldehyde                   | 0.075           |  | lb/MMscf | B      | Yes  | Yes  | 0.00   | 2.898529412 | 0.00033088 | 0.00794118 |
| 4.5      | 8760     | 110-54-3   | Hexane                         | 1.8             |  | lb/MMscf | E      | Yes  | Yes  | 0.03   | 69.56470588 | 0.00794118 | 0.19058824 |
| 4.5      | 8760     | 193-39-5   | Indeno(1,2,3,c,d)pyrene        | 1.80E-06        |  | lb/MMscf | E      | Yes  | Yes  | 0.00   | 6.95647E-05 | 7.9412E-09 | 1.9059E-07 |
| 4.5      | 8760     | 91-20-3    | Naphthalene                    | 0.00061         |  | lb/MMscf | E      | Yes  | Yes  | 0.00   | 0.023574706 | 2.6912E-06 | 6.4588E-05 |
| 4.5      | 8760     | 109-66-0   | Pentane                        | 2.6             |  | lb/MMscf | E      | No   | No   | 0.05   | 100.4823529 | 0.01147059 | 0.27529412 |
| 4.5      | 8760     | 85-01-8    | Phenanthrene                   | 0.000017        |  | lb/MMscf | D      | No   | No   | 0.00   | 0.000657    | 7.5E-08    | 0.0000018  |
| 4.5      | 8760     | 74-98-6    | Propane                        | 1.6             |  | lb/MMscf | E      | No   | No   | 0.03   | 61.83529412 | 0.00705882 | 0.16941176 |
| 4.5      | 8760     | 129-00-0   | Pyrene                         | 0.000005        |  | lb/MMscf | E      | No   | No   | 0.00   | 0.000193235 | 2.2059E-08 | 5.2941E-07 |
| 4.5      | 8760     | 108-88-3   | Toluene                        | 0.0034          |  | lb/MMscf | C      | Yes  | Yes  | 0.00   | 0.1314      | 0.000015   | 0.00036    |
| 4.5      | 8760     | 7440-38-2  | Arsenic                        | 0.0002          |  | lb/MMscf | E      | Yes  | No   | 0.00   | 0.007729412 | 8.8235E-07 | 2.1176E-05 |
| 4.5      | 8760     | 7440-39-3  | Barium                         | 0.0044          |  | lb/MMscf | D      | No   | No   | 0.00   | 0.170047059 | 1.9412E-05 | 0.00046588 |
| 4.5      | 8760     | 7440-41-7  | Beryllium                      | 1.20E-05        |  | lb/MMscf | E      | Yes  | No   | 0.00   | 0.000463765 | 5.2941E-08 | 1.2706E-06 |
| 4.5      | 8760     | 7440-43-9  | Cadmium                        | 0.0011          |  | lb/MMscf | D      | Yes  | Yes  | 0.00   | 0.042511765 | 4.8529E-06 | 0.00011647 |
| 4.5      | 8760     | 7440-47-3  | Chromium, total                | 0.0014          |  | lb/MMscf | D      | Yes  | No   | 0.00   | 0.054105882 | 6.1765E-06 | 0.00014824 |
| 4.5      | 8760     | 7440-48-4  | Cobalt                         | 0.000084        |  | lb/MMscf | D      | Yes  | Yes  | 0.00   | 0.003246353 | 3.7059E-07 | 8.8941E-06 |
| 4.5      | 8760     | 7440-50-8  | Copper                         | 0.00085         |  | lb/MMscf | C      | No   | No   | 0.00   | 0.03285     | 0.00000375 | 0.00009    |
| 4.5      | 8760     | 7439-92-1  | Lead                           | 0.0005          |  | lb/MMscf | D      | Yes  | Yes  | 0.00   | 0.019323529 | 2.2059E-06 | 5.2941E-05 |
| 4.5      | 8760     | 7439-96-5  | Manganese                      | 0.00038         |  | lb/MMscf | D      | Yes  | No   | 0.00   | 0.014685882 | 1.6765E-06 | 4.0235E-05 |
| 4.5      | 8760     | 7439-97-6  | Mercury                        | 0.00026         |  | lb/MMscf | D      | Yes  | Yes  | 0.00   | 0.010048235 | 1.1471E-06 | 2.7529E-05 |
| 4.5      | 8760     | 7439-98-7  | Molybdenum                     | 0.0011          |  | lb/MMscf | D      | No   | No   | 0.00   | 0.042511765 | 4.8529E-06 | 0.00011647 |
| 4.5      | 8760     | 7440-02-0  | Nickel                         | 0.0021          |  | lb/MMscf | C      | Yes  | No   | 0.00   | 0.081158824 | 9.2647E-06 | 0.00022235 |
| 4.5      | 8760     | 7782-49-2  | Selenium                       | 2.40E-05        |  | lb/MMscf | E      | Yes  | No   | 0.00   | 0.000927529 | 1.0588E-07 | 2.5412E-06 |
| 4.5      | 8760     | 7440-62-2  | Vanadium                       | 0.0023          |  | lb/MMscf | D      | No   | Yes  | 0.00   | 0.088888235 | 1.0147E-05 | 0.00024353 |
| 4.5      | 8760     | 7440-66-6  | Zinc                           | 0.029           |  | lb/MMscf | E      | No   | No   | 0.00   | 1.120764706 | 0.00012794 | 0.00307059 |

POM

1. HAP emission factors from USEPA AP-42 1.4, Tables 1.4.1-4. [1.4 natural gas combustion.pdf \(epa.gov\)](#)
2. **Blue Cell:** CAS not identified as HAP; however, AP-42 footnote assigns as a HAP as Polycyclic Organic Matter (POM).
3. RCO burner capacity of 1.8 MMBtu/hr
4. Natural gas heating value 1020 Btu/scf

Table C-10 - Product Loadout - Truck Loadout (EP-15)

| Emission Point ID | Point or Fugitive | Emission Source | Throughput <sup>1</sup> |                  | Pollutant <sup>2</sup>                    | Emission factor (lb/ton) | Number of "Drops" <sup>3</sup> | Potential Emissions |            |
|-------------------|-------------------|-----------------|-------------------------|------------------|-------------------------------------------|--------------------------|--------------------------------|---------------------|------------|
|                   |                   |                 | (short tons/year)       | (short tons/day) |                                           |                          |                                | (lb/day)            | (ton/year) |
| EP-15             | Fugitive          | Truck Loadout   | 32000                   | 330              | Filterable PM <sup>3</sup>                | 0.0015                   | 1                              | 0.50                | 0.02       |
|                   |                   |                 |                         |                  | Filterable PM <sub>10</sub> <sup>3</sup>  | 0.0007                   |                                | 0.23                | 0.01       |
|                   |                   |                 |                         |                  | Filterable PM <sub>2.5</sub> <sup>3</sup> | 0.0001                   |                                | 0.03                | 0.00       |

1. PNWRE proposes no more than 32,000 tons per year for use of the truck loadout capability for annual emissions and and no more than 10 trucks per day (330 tons of product per day, assuming no more than 33 tons of product per loaded truck) for daily emissions.

2. PM emission factors for truck loadout from US EPA Memo "Particulate Matter Potential to Emit Emission Factors for Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest Indian Country," May 8, 2014.

3. Emissions are generated from each "drop" of material from one surface to another. All conveyor transitions are enclosed; therefore, not counted as emissions points. There is one drop from loadout spout to truck.



Table C-12a - Emergency Generator (GEN-01)

| Parameter                          | Value | Units | Notes                              |
|------------------------------------|-------|-------|------------------------------------|
| Engine size                        | 500   | hp    | Assumed size for 300 kW generator  |
| Max Annual Non-Emergency Operation | 100   | hours | Limited by 40 CFR 60, Subpart IIII |

## Estimated Maximum Rates from Emergency Generator

| Pollutant                              | Emission Factor | Units     | Potential Annual Emissions (TPY) |
|----------------------------------------|-----------------|-----------|----------------------------------|
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> | 3.31E-04        | lbs/hp-hr | 0.01                             |
| NO <sub>x</sub>                        | 6.61E-03        | lbs/hp-hr | 0.17                             |
| CO                                     | 5.73E-03        | lbs/hp-hr | 0.14                             |
| VOC                                    | 2.51E-03        | lbs/hp-hr | 0.06                             |
| SO <sub>2</sub>                        | 2.05E-03        | lbs/hp-hr | 0.05                             |
| CO <sub>2</sub>                        | 1.15E+00        | lbs/hp-hr | 28.75                            |

## Notes:

Emission factors for PM, NO<sub>x</sub>, and CO are based on EPA Tier 3 emission standards

All PM assumed to be less than 2.5 micron diameter; therefore, PM=PM<sub>10</sub>=PM<sub>2.5</sub>

Emission factors for VOC, SO<sub>2</sub> and CO<sub>2</sub> are based on EPA AP-42, Section 3.3, Table 3.3-1, 10/96

Table C-11b - Emergency Generator Organics (GEN-01)  
500 =engine hp

| hp  | hours/yr | CAS       | Pollutant Name                               | Emission Factor <sup>1</sup> | Units    | Rating | HAP? | TAP? | ton/yr | lb/yr    | lb/hr    | lb/24hr <sup>2</sup> |
|-----|----------|-----------|----------------------------------------------|------------------------------|----------|--------|------|------|--------|----------|----------|----------------------|
| 500 | 100      | 71-43-2   | Benzene                                      | 0.000933                     | lb/hp-hr | E      | Yes  | Yes  | 0.02   | 4.67E+01 | 4.67E-01 | 4.67E-01             |
| 500 | 100      | 108-88-3  | Toluene                                      | 4.09E-04                     | lb/hp-hr | E      | Yes  | Yes  | 0.01   | 2.05E+01 | 2.05E-01 | 2.05E-01             |
| 500 | 100      | 1330-20-7 | Xylenes                                      | 2.85E-04                     | lb/hp-hr | E      | Yes  | Yes  | 0.01   | 1.43E+01 | 1.43E-01 | 1.43E-01             |
| 500 | 100      | 115-07-1  | Propylene                                    | 2.58E-03                     | lb/hp-hr | E      | No   | Yes  | 0.06   | 1.29E+02 | 1.29E+00 | 1.29E+00             |
| 500 | 100      | 106-99-0  | 1,3-Butadiene                                | 3.91E-05                     | lb/hp-hr | E      | Yes  | Yes  | 0.00   | 1.96E+00 | 1.96E-02 | 1.96E-02             |
| 500 | 100      | 50-00-0   | Formaldehyde                                 | 1.18E-03                     | lb/hp-hr | E      | Yes  | Yes  | 0.03   | 5.90E+01 | 5.90E-01 | 5.90E-01             |
| 500 | 100      | 75-07-0   | Acetaldehyde                                 | 7.67E-04                     | lb/hp-hr | E      | Yes  | Yes  | 0.02   | 3.84E+01 | 3.84E-01 | 3.84E-01             |
| 500 | 100      | 107-02-8  | Acrolein                                     | 0.0000925                    | lb/hp-hr | E      | Yes  | Yes  | 0.00   | 4.63E+00 | 4.63E-02 | 4.63E-02             |
| 500 | 100      | 91-20-3   | Naphthalene                                  | 9.25E-05                     | lb/hp-hr | E      | Yes  | Yes  | 0.00   | 4.63E+00 | 4.63E-02 | 4.63E-02             |
| 500 | 100      | 208-96-8  | Acenaphthylene                               | 5.06E-06                     | lb/hp-hr | E      | No   | No   | 0.00   | 2.53E-01 | 2.53E-03 | 2.53E-03             |
| 500 | 100      | 83-32-9   | Acenaphthene                                 | 1.42E-06                     | lb/hp-hr | E      | No   | No   | 0.00   | 7.10E-02 | 7.10E-04 | 7.10E-04             |
| 500 | 100      | 86-73-7   | Fluorene                                     | 2.92E-05                     | lb/hp-hr | E      | No   | No   | 0.00   | 1.46E+00 | 1.46E-02 | 1.46E-02             |
| 500 | 100      | 85-01-8   | Phenanthrene                                 | 0.0000294                    | lb/hp-hr | E      | No   | No   | 0.00   | 1.47E+00 | 1.47E-02 | 1.47E-02             |
| 500 | 100      | 120-12-7  | Anthracene                                   | 1.87E-06                     | lb/hp-hr | E      | No   | No   | 0.00   | 9.35E-02 | 9.35E-04 | 9.35E-04             |
| 500 | 100      | 206-44-0  | Fluoranthene                                 | 7.61E-06                     | lb/hp-hr | E      | No   | No   | 0.00   | 3.81E-01 | 3.81E-03 | 3.81E-03             |
| 500 | 100      | 129-00-0  | Pyrene                                       | 0.00000478                   | lb/hp-hr | E      | No   | No   | 0.00   | 2.39E-01 | 2.39E-03 | 2.39E-03             |
| 500 | 100      | 56-55-3   | Benz(a)anthracene                            | 0.00000168                   | lb/hp-hr | E      | Yes  | Yes  | 0.00   | 8.40E-02 | 8.40E-04 | 8.40E-04             |
| 500 | 100      | 218-01-9  | Chrysene                                     | 0.00000353                   | lb/hp-hr | E      | No   | Yes  | 0.00   | 1.77E-02 | 1.77E-04 | 1.77E-04             |
| 500 | 100      | 205-99-2  | Benzo(b)fluoranthene                         | 9.91E-08                     | lb/hp-hr | E      | Yes  | Yes  | 0.00   | 4.96E-03 | 4.96E-05 | 4.96E-05             |
| 500 | 100      | 207-08-9  | Benzo(k)fluoranthene                         | 0.000000155                  | lb/hp-hr | E      | Yes  | Yes  | 0.00   | 7.75E-03 | 7.75E-05 | 7.75E-05             |
| 500 | 100      | 50-32-8   | Benzo(a)pyrene                               | 0.000000188                  | lb/hp-hr | E      | Yes  | Yes  | 0.00   | 9.40E-03 | 9.40E-05 | 9.40E-05             |
| 500 | 100      | 193-39-5  | Indeno(1,2,3-cd)pyrene                       | 3.75E-07                     | lb/hp-hr | E      | Yes  | Yes  | 0.00   | 1.88E-02 | 1.88E-04 | 1.88E-04             |
| 500 | 100      | 53-70-3   | Dibenz(a,h)anthracene                        | 0.000000583                  | lb/hp-hr | E      | Yes  | Yes  | 0.00   | 2.92E-02 | 2.92E-04 | 2.92E-04             |
| 500 | 100      | 191-24-2  | Benzo(g,h,i)perylene                         | 0.000000489                  | lb/hp-hr | E      | No   | No   | 0.00   | 2.45E-02 | 2.45E-04 | 2.45E-04             |
| 500 | 100      | PAH       | Total Polycyclic Aromatic Hydrocarbons (PAH) | 0.000168                     | lb/hp-hr | E      | No   | No   | 0.00   | 8.40E+00 | 8.40E-02 | 8.40E-02             |

1. HAP emission factors from USEPA AP-42 3.3, Table 3.3-2.

2. Because an emergency generator is an intermittent source and would only operate for short periods of time for maintenance checks and readiness testing, the 24-hour rates are assumed to be equal to the hourly rates.



**FILE COPY**

STATE OF MISSISSIPPI

PHIL BRYANT

GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

GARY C. RIKARD, EXECUTIVE DIRECTOR

May 23, 2017

**CERTIFIED MAIL: 7010 1670 0000 1401 4884**

Mr. Joe Harrell, Corp. EHS Mgr.  
Enviva Pellets Amory LLC  
142 N C Route 561 East  
Ahoskie, NC 27910

Re: Notice of Violation  
Enviva Pellets Amory LLC  
Amory, Mississippi  
Monroe County  
Air-Title V Operating Permit No. 1840-00082

Dear Mr. Harrell:

Our office has received multiple complaints over the past year pertaining to sawdust and smoke leaving the above referenced facility impacting neighboring properties and vehicles. It has also been stated that the dust and smoke is causing respiratory problems for some of the citizens in the area.

As a result of these complaints, our Regional Office inspectors have been on site to investigate, and I was in contact with Enviva personnel to discuss the means by which the facility decided would prevent or minimize the dust that leaves the site. The controls and operating procedures put in place as a result of our conversations are proving to be insufficient in preventing further contamination of the surrounding properties and problems for the citizens. An inspector was on site as recent as April 6, 2017 to investigate additional complaints received in March and April, 2017. While our inspector was on site, he spoke with Mr. Paul Pigg and Davis Lovelace, both personnel of Enviva about potential dust and smoke areas of concern. Since the April 6<sup>th</sup> investigation, we have continued to receive similar complaints. Based upon our findings during the investigations, we hereby cite the following alleged violations:

- Failure to prevent materials, particularly sawdust and smoke, in unnecessary amounts from leaving the site.

Agency Interest No. 24301  
ENF20170001

OFFICE OF POLLUTION CONTROL

POST OFFICE BOX 2261 • JACKSON, MISSISSIPPI 39225-2261 • TEL: (601) 961-5171 • FAX: (601) 354-6612 • [www.deq.state.ms.us](http://www.deq.state.ms.us)

AN EQUAL OPPORTUNITY EMPLOYER

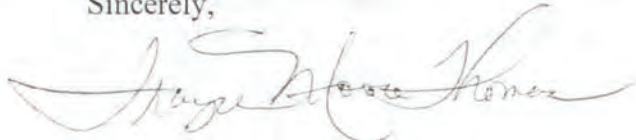
No person shall cause, permit, or allow the emission of particles or any contaminants in sufficient amounts or of such duration from any process as to be injurious to humans, animals, plants, or property, or to be a public nuisance, or create a condition of air pollution.

- (1) No person shall cause or permit the handling or transporting or storage of any material in a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.
- (2) When dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance to property other than that from which it originated or to violate any other provision of this regulation, the Commission may order such corrected in a way that all air and gases or air and gasborne material leaving the building or equipment are controlled or removed prior to discharge to the open air. (*Ref: Title V Operating Permit No. 1840-00082, Item 3.B.6 and 11 Miss. Admin. Code Pt. 2, R.1.3.C.(1 & 2))*)

We request that you respond to these alleged violations no later than **June 9, 2017**. We will review the information submitted before determining if further action is warranted. Failure to submit a response to this request may result in enforcement action.

If you have any questions concerning this matter, please contact me at (601) 961-5793.

Sincerely,



Trayce Moore-Thomas  
Timber and Wood Products Branch  
Environmental Compliance and Enforcement Division

Cc: Mr. John Burns, Enviva, Amory



+1 (240) 482 3825 (direct line)  
cell (240) 459 0128  
[robert.mcculloch@envivabiomass.com](mailto:robert.mcculloch@envivabiomass.com)

**From:** Matt Hannon [<mailto:valveman@americancontrols.com>]  
**Sent:** Wednesday, April 05, 2017 4:37 PM  
**To:** Robert McCulloch <[Robert.McCulloch@envivabiomass.com](mailto:Robert.McCulloch@envivabiomass.com)>  
**Cc:** [tim\\_aultman@deq.state.ms.us](mailto:tim_aultman@deq.state.ms.us); [mayor@cityofamoryms.com](mailto:mayor@cityofamoryms.com); [zackmc@cityofamoryms.com](mailto:zackmc@cityofamoryms.com); [john@creekmorelawoffice.com](mailto:john@creekmorelawoffice.com)  
**Subject:** RE: Enviva Amory MS Facility

Dear all,

This email intent is just to notify that the weather today has duplicated the conditions we continue to have issues with. I have contacted our regional DEQ rep per his request. I know the entire town is experiencing this as I have had many complaints of smoke and saw dust as we are preparing for the annual railroad festival. This email is just for documentation, I will continue to send these as record of the problems as they occur. Our shop is filled with smoke and lose flying saw dust that continues to cause health and safety risk for my workers as well as in the open air around the area.

Best Regards,

Matt Hannon - VP  
A.C.T., Inc.  
311 Front Street North  
Amory, MS 38821  
Phone: 662-257-9952 Ext. 501  
Fax: 662-256-4118  
Email: [valveman@americancontrols.com](mailto:valveman@americancontrols.com)  
James 1:12 (NIV)

---

**From:** Matt Hannon [<mailto:valveman@americancontrols.com>]  
**Sent:** Thursday, March 23, 2017 3:10 PM  
**To:** 'robert.mcculloch@envivabiomass.com'  
**Cc:** 'tim\_aultman@deq.state.ms.us'; 'mayor@cityofamoryms.com'; 'zackmc@cityofamoryms.com'; 'john@creekmorelawoffice.com'  
**Subject:** Enviva Amory MS Facility

Good day Mr. McCulloch,


Thank you for your time on the phone Tuesday regarding our ongoing issues here with the Amory Enviva facility impacting our business and health. I have a link below to a Dropbox folder that contains stills and video of the issues we have experienced for many years. Some of the photos are from Google Earth and reference the date taken from satellite imagery and you can see the condition of our roof deteriorate as the plant increased its production over time to the point of having to replace our entire roof in 2015 as it expedited the rusting process with the saw dust and smoke that is air borne combined with rain water to form acid rain. Also notice the buildings surround had the same effect from year 2012 -2013. The brunt of the major affect is driven by the weather behavior and seems to coincide with days the facility is not functioning as to spec by MDEQ and operating efficiently. We just want a fair approach to this matter especially on days where the weather is pushing this material into our facility and affecting the health and safety of my

workers. Please feel free to contact myself, the Amory Mayor Mr. Brad Blalock @ 662-256-5635, the Amory City Attorney Mr. John Creekmore @ 662-256-8208 or Mr. Tim Aultman with Mississippi Department of Environmental Quality @ 601-961-5653 as they are all aware from myself as well as MANY other individuals in the community who are ready to speak to you and voice their experiences and issues it has physically caused to their facilities and health of the ongoing and growing issue. If you need others in the community to hear from I can provide as many contacts as you would like or have them contact you directly. The photos and video do not do the issue justice as to the level of health danger on the days like we had on Tuesday when the plant manager came over and witnessed firsthand the direct affects and admitted the issue is real and needful of addressing. I am grateful for you working with us and look forward to your response and plan of action going forward.


[https://www.dropbox.com/sh/k7n0manlsp19l8u/AACUt7v-PRrBDVVMx3z\\_239Za?dl=0](https://www.dropbox.com/sh/k7n0manlsp19l8u/AACUt7v-PRrBDVVMx3z_239Za?dl=0)

CC: Mr. Brad Blalock - Mayor  
Mr. John Creekmore - Attorney  
Mr. Tim Aultman - MDEQ  
Mr. Zack McGonagil - Fire Chief

Best Regards,



**AMERICAN  
CONTROLS  
TECHNOLOGY  
INC.**

**MATT HANNON**  
Vice President  
valveman@americancontrols.com  
Cell(662)315-1646  
James 1:12 NIV 

311 Front St. N.  
Amory, MS 38821  
(662)257-9952  
Fax(662)256-4118  
[www.americancontrols.com](http://www.americancontrols.com)

Valves - Actuation - Engineering

Matt Hannon - VP  
A.C.T., Inc.  
311 Front Street North  
Amory, MS 38821  
Phone: 662-257-9952 Ext. 501  
Fax: 662-256-4118  
Email: [valveman@americancontrols.com](mailto:valveman@americancontrols.com)  
James 1:12 (NIV)

## Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).



# Emission of Hexanal and Carbon Monoxide from Storage of Wood Pellets, a Potential Occupational and Domestic Health Hazard

URBAN R. A. SVEDBERG<sup>1,2\*</sup>, HANS-ERIK HÖGBERG<sup>3</sup>, JOHAN HÖGBERG<sup>4</sup>  
and BO GALLE<sup>5</sup>

<sup>1</sup>Department of Occupational and Environmental Medicine, Sundsvall Hospital, SE-851 86 Sundsvall;  
<sup>2</sup>Department of Medical Sciences/Occupational and Environmental Medicine, Uppsala University, SE-751 85 Uppsala; <sup>3</sup>Mid Sweden University, Department of Natural and Environmental Sciences, SE-851 70 Sundsvall; <sup>4</sup>Karolinska Institute, Institute of Environmental Medicine, Box 210, SE-171 77 Stockholm; <sup>5</sup>Department of Radio and Space Science, Chalmers University of Technology, SE-412 Göteborg, Sweden

Received 23 June 2003; in final form 15 October 2003; published online on 10 March 2004

**Objectives:** The objective of the present study was to investigate and describe the emissions of volatile compounds, particularly hexanal and carbon monoxide, from large- and small-scale storage of wood pellets.

**Methods:** Air sampling was performed with Fourier transform infrared spectroscopy and adsorbent sampling in pellet warehouses, domestic storage rooms, lumber kiln dryers and experimental set-ups. Literature studies were included to describe the formation of hexanal and carbon monoxide and the toxicology of hexanal.

**Results:** A geometric mean aldehyde level of  $111 \pm 32$  mg/m<sup>3</sup> was found in one warehouse, with a peak reading of 156 mg/m<sup>3</sup>. A maximum aldehyde reading of 457 mg/m<sup>3</sup> was recorded at the surface of a pellet pile. Hexanal (70–80% w/w) and pentanal (10–15% w/w) dominated, but acetone ( $83 \pm 24$  mg/m<sup>3</sup>), methanol ( $18 \pm 7$  mg/m<sup>3</sup>) and carbon monoxide ( $56 \pm 4$  mg/m<sup>3</sup>) were also found. The emissions in a domestic storage room varied with the ambient temperature and peaked after 2 months storage in the midst of the warm season. Aldehyde levels of  $98 \pm 4$  mg/m<sup>3</sup> and carbon monoxide levels of  $123 \pm 10$  mg/m<sup>3</sup> were recorded inside such storage rooms. Elevated levels of hexanal (0.084 mg/m<sup>3</sup>) were recorded inside domestic housing and 6 mg/m<sup>3</sup> in a room adjacent to a poorly sealed storage area. Experimental laboratory studies confirmed the findings of the field studies. A field study of the emissions from industrial lumber drying also showed the formation of aldehydes and carbon monoxide.

**Conclusions:** High levels of hexanal and carbon monoxide were strongly associated with storage of wood pellets and may constitute an occupational and domestic health hazard. The results from lumber drying show that the emissions of hexanal and carbon monoxide are not limited to wood pellets but are caused by general degradation processes of wood, facilitated by drying at elevated temperature. Emission of carbon monoxide from wood materials at low temperatures (<100°C) has not previously been reported in the literature. We postulate that carbon monoxide is formed due to autoxidative degradation of fats and fatty acids. A toxicological literature survey showed that the available scientific information on hexanal is insufficient to determine the potential risks to health. However, the data presented in this paper seem sufficient to undertake preventive measures to reduce exposure to hexanal.

**Keywords:** air sampling; exposure; FTIR; work environment

\*Author to whom correspondence should be addressed. Fax: +46-60-18-19-80; e-mail: urban.svedberg@lvn.se

## INTRODUCTION

The production of wood pellets is a relatively new industrial activity in Sweden. Wood pellets are increasingly used as a source of renewable energy for industrial, municipal and domestic heating. According to the Swedish Pellet Producers Association the annual production in Sweden increased from 90 000 tons in 1994 to 714 000 tons in 2001. The raw material for wood pellets in Scandinavia is primarily wooden by-products from the sawmill industry. The dominant timbers are the common Scandinavian conifers Norway spruce (*Picea abies*) and Scots pine (*Pinus sylvestris*). The unprocessed material is stored in the open. It is ground and dried to ~8% water content and without any other additives pressed to pellets. The raw material is handled in a closed process under negative air pressure until the pellets are pressed, after which it is handled in the open in the warehouses. The typical wood pellet is 6 or 8 mm in diameter and 10–12 mm long and shipped to customers in sacks or in bulk on trucks or cargo vessels.

Information about the potential health hazards associated with the production and handling of wood pellets is sparse in the scientific literature and the emissions and occupational exposures in the workers' zones of wood pellet manufacturing have not previously been described. A screening study was performed in a pellet factory, initiated by workers' complaints of odour and irritation of the eyes and respiratory system, particularly while working in the pellet warehouse (Svedberg and Galle, 2001). Hexanal, pentanal, methanol, acetone and carbon monoxide were identified by Fourier transform infrared (FTIR) spectroscopy and adsorbent sampling in the pellet warehouse. The closed production system minimized emissions inside the production plant.

The objective of the present study was to investigate and describe the presence and formation of volatile compounds, particularly hexanal and carbon monoxide, from storage of wood pellets. Supplementary monitoring of emissions from kiln drying of wood was performed to determine if the emissions were specific for wood pellet production or more general in nature. Experimental laboratory studies were carried out to confirm the results from the field studies. Literature surveys were made on the formation of hexanal and carbon monoxide and on the toxicology of hexanal.

## MATERIALS AND METHODS

### FTIR sampling

Air sampling was performed using FTIR technique. An FTIR instrument (MB100; Bomem, Quebec, Canada) was equipped with a mercury–

cadmium–tellurium (MCT) detector with a 1 mm<sup>2</sup> detector area (Belov Technology, New Brunswick, NJ). The sample air was continuously pumped (4–30 l/min) through a Teflon tube (13 mm) into the analytical gas cell (5.7 l, variable path length, 0.75–20.25 m; Foxboro Inc.). During sampling in the field, a particle filter type P3 was installed at the sampling tube inlet to protect the tubing and the analytical cell from contamination. The spectral information generated by the FTIR instrument was stored in a computer and the succeeding spectral analysis was made at the end of the sampling sessions. One location was sampled by filling Tedlar sampling bags (SKC) with sample air, that was then evacuated into the FTIR gas cell.

Spectral information was collected in the 600–4000 cm<sup>-1</sup> wavelength region with 1 cm<sup>-1</sup> spectral resolution. Qualitative and quantitative analysis was performed using LabCalc software (Galactic Inc., Salem, NH). When the spectral information displayed stable baselines with no interference by unknown compounds in the regions of interest, a classical least squares (CLS) method was used for the quantitative analysis, analogous to our application described elsewhere (Svedberg and Galle, 2000). The CLS analysis was modified to fit each set of sample spectra embracing the choice of the wavelength region, inclusion or exclusion of compounds and baseline adjustment. When the CLS method did not work satisfactorily, a peak area proportionality comparison was used. Both methods required the use of pre-calibrated spectra that were either generated in the laboratory by injecting known aliquots into the analytical cell or obtained from commercial spectral databases (Infrared Analysis).

The limits of detection (LOD) were calculated as three times the peak-to-peak noise level in an absorbance spectrum at 258 scans created by ratioing two consecutive background spectra. The LOD obtained for the identified compounds are presented in Table 1. The actual LOD may be less, due to spectral noise, skewed baselines and interfering peaks. The IR signal in the 'fingerprint region' (600–1300 cm<sup>-1</sup>) is too weak to resolve individual straight chain aldehydes at the concentrations found. The strong aldehyde peak at 2712 cm<sup>-1</sup> has approximately equal absorption for

Table 1. Limits of detection (LOD) limits with the FTIR system for identified compounds

|                 | IR frequency (cm <sup>-1</sup> ) | LOD (mg/m <sup>3</sup> ) |
|-----------------|----------------------------------|--------------------------|
| Aldehydes       | 2680–2740                        | 1                        |
| Formaldehyde    | 2775–2783                        | 0.5                      |
| Formic acid     | 1061–1144                        | 0.03                     |
| Acetone         | 1180–1250                        | 0.15                     |
| Methanol        | 970–1096                         | 0.15                     |
| Carbon monoxide | 2109–2092                        | 0.27                     |



the dominant straight chain aldehydes found in this study and the FTIR results are therefore expressed as hexanal equivalents based on this peak. Formaldehyde has a characteristic spectrum and can be singled out from other aldehydes.

#### *Adsorbent sampling and analysis*

Pumped and diffusion sampling was performed using thermal desorption tubes with Tenax TA and Air Toxics™ adsorbents (Supelco) (200 mg, 60–80 mesh). All pumped sampling was carried out with SKC pumps (model 224-30) and a flow rate of 30 ml/min.

Thermal desorption was performed with an automatic thermal desorption system (ATD-400; Perkin-Elmer). The sample was desorbed from the adsorbent into a cold trap packed with ~10–20 mg of Tenax TA. After injection the cold trap was heated at a rate of 40°C/s to the specified temperature. An outlet split was used. The parameters for the ATD-systems were: desorption temperature 250°C, desorption time 5 min, purge time 1 min, cold trap low temperature –30°C, cold trap high temperature 300°C, cold trap time at high temperature 5 min, desorption flow rate 30 ml/min, inlet split 0 ml/min, outlet split 10 ml/min.

Gas chromatographic separation using an Auto-system XL (Perkin-Elmer) was performed by the use of a high resolution capillary column (CP Wax 52CB, catalogue no. CP8073; Varian), 60 m × 0.32 mm, DF 1.2 µm. The temperature program was 60°C (0 min), 6°C/min to 250°C (5 min). Detection was performed with a TurboMass mass selective detector (Perkin-Elmer).

Data collection was done at full scan in the mass range 35–300 *m/e*. The calculations were done by use of both full scan areas and areas at specified *m/e* values, depending on which compound was to be determined. The analyses were performed by Chemik Lab AB, Sweden.

#### *Sample locations*

**Industrial warehouses.** Three industrial production plants (A, B and C) using different methods for drying the raw material were included in the study. Plant A used a direct drying method with flue gases from a pellet-fired hot gas generator (400–500°C); plant B used a direct drying method using flue gases from a nearby iron blast furnace (450°C); plant C used an indirect drying method with a heat exchanger where the sawdust did not come into contact with the drying gases (195°C). Air sampling was carried out in the pellet warehouses. In plants A and B the samples were collected on the service walkways suspended over the pellet piles. Below and along the walkways, conveyor belts distributed freshly produced pellets into oblong piles. In plant C the samples were collected on top of the pile in Tedlar sampling bags.

**Domestic storage rooms.** In Sweden, wood pellets are increasingly finding their way into domestic houses, replacing in particular oil as the principal source of energy for heating purposes. Many house owners have built or set aside separate rooms where 3–6 tons of wood pellets can be stored. The rooms are normally filled with pellets by means of compressed air from bulk loading trucks. The emissions from three household storage rooms were investigated. In one storage, after delivery of 5 tons of freshly produced pellets in a closed storage bin, the emissions and the temperature in the centre and above the pile were monitored continuously over 3 months. FTIR samples were collected in the air space (7 m<sup>3</sup>) above the pellet pile. The air was circulated to the FTIR and back to the bin. The specific air exchange rate of the bin was calculated using a tracer gas (N<sub>2</sub>O) decay method and FTIR for detection. A second continuous measurement lasted for 18 h after delivery of 6 tons of freshly produced pellets. This time the air was pumped from the bin to the gas cell and vented outdoors (30 l/min). The concentration due to leakage of emissions into the room adjacent to the storage bin was also determined. Emission leakage was further investigated inside two other houses adjacent to the in-house closed storage rooms. Sampling was performed by diffusion sampling on Tenax adsorbent over 10 days.

**Laboratory tests.** Emissions from wood pellets produced at the three production plants A, B and C were investigated in the laboratory. Pellets (10 kg) were placed in a galvanized steel canister, with a 1 cm air gap, on a thermostatically controlled hot plate. The canister had an air inlet in the bottom and an outlet at the top that was connected by Teflon tubing to the FTIR analytical cell and an air pump. The room air was thus pulled through the pellets and into the analytical cell. The flow rates were either 4 or 30 l/min depending on the application. Temperature sensors were positioned at the bottom and in the surface layer of the pellet bed. The thermostat was adjusted until a dynamic temperature at the bottom of the canister of ~80°C was achieved, producing a surface temperature of 35–40°C. To minimize the risk of condensation the analytical cell was heated to ~70°C and the canister and the connecting tubing were thermally insulated. Samples of the room air were used as reference spectra, thus reducing possible interference from background levels of carbon monoxide.

**Kiln drying of lumber.** The emissions from industrial kiln drying of Scots pine were investigated. The dryer was loaded with 115.5 m<sup>3</sup> of lumber (25 × 125 mm). The FTIR instrument was connected by 10 m of Teflon tubing to the exhaust duct of the kiln. The analytical cell was preheated to ~70°C. The

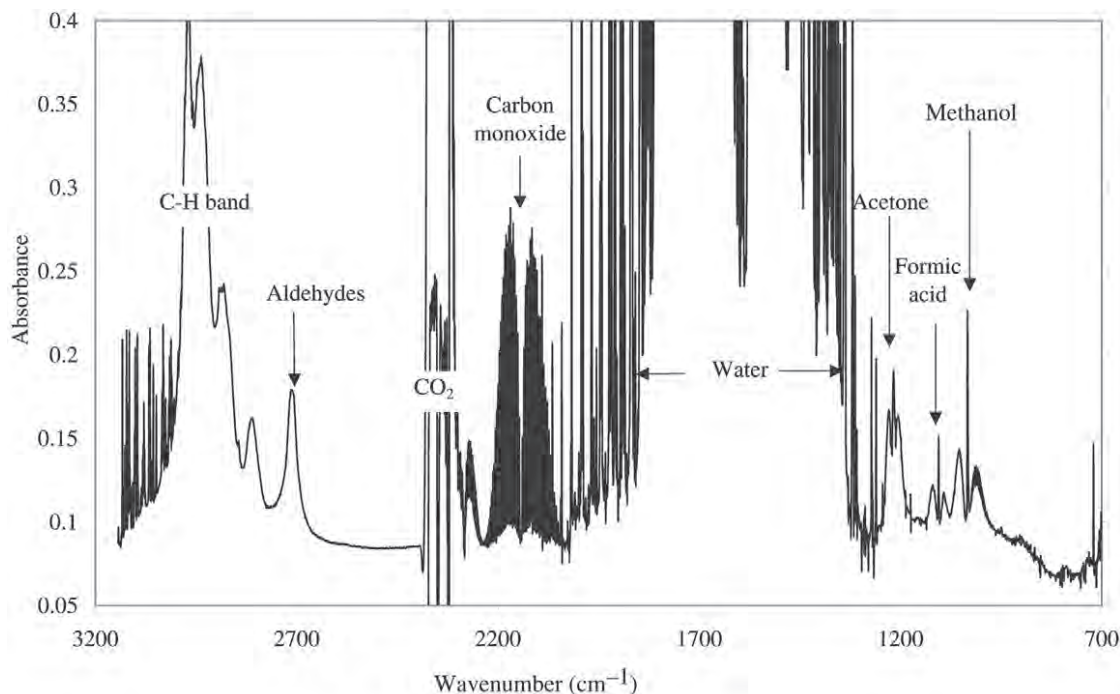


Fig. 1. An FTIR spectrum from the service walkway in plant A.

drying schedule was automatically regulated to control the rate of water removal. Initially the drying chamber was heated to 55°C before ventilation was started. The temperature was then slowly increased to a final value of 68°C. The total drying time was 95 h, during which the moisture content was reduced from ~50 to 10% (w/v).

## RESULTS

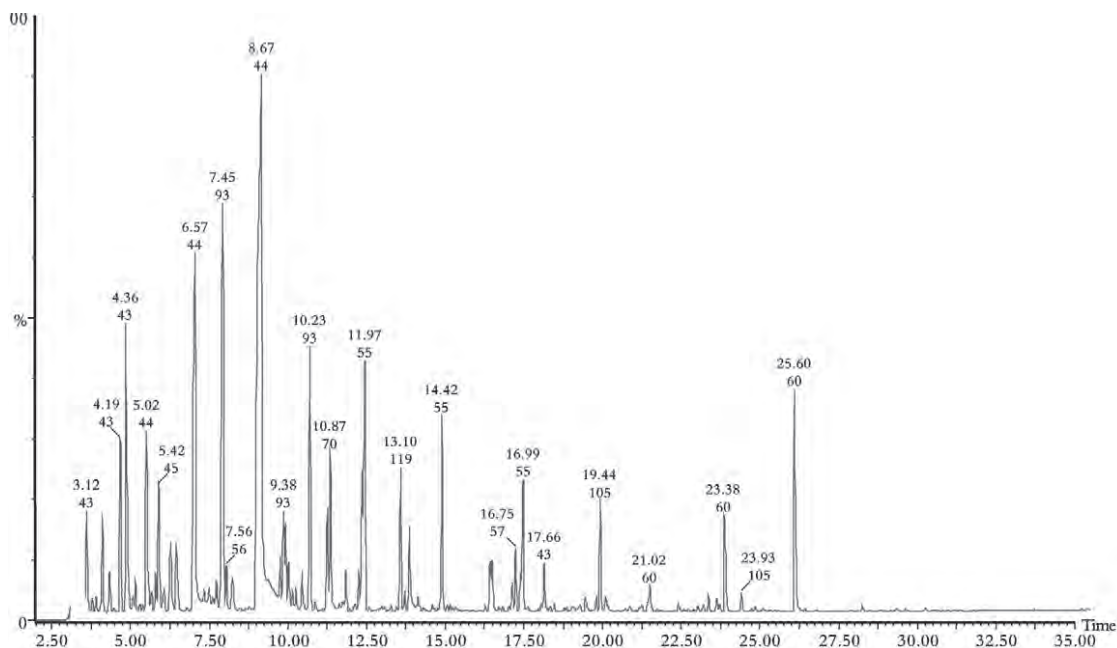
### Industrial warehouses

The FTIR measurements inside the warehouses at plants A (3 h) and B (18 h) showed that the dominant organic compounds were aldehydes (50–60% w/w), acetone (30–40% w/w) and methanol (10% w/w) (Fig. 1). A geometric mean aldehyde level of  $111 \pm 32 \text{ mg/m}^3$  was found in plant B on the service walkway, with a peak reading of  $156 \text{ mg/m}^3$ . Hexanal (70–80% w/w) and pentanal (10–15% w/w) predominated, but acetone ( $83 \pm 24 \text{ mg/m}^3$ ), methanol ( $18 \pm 7 \text{ mg/m}^3$ ) and carbon monoxide ( $56 \pm 4 \text{ mg/m}^3$ ) were also found. A maximum aldehyde reading of  $457 \text{ mg/m}^3$  was recorded with the sampling probe resting on the top of the pellet pile. The measurement was taken during a period with elevated pile surface temperature (0.2 m down the temperature was 88°C; 1.5 m down, 67°C; and 2.0 m down, 54°C.). A Tenax sample taken in parallel with the FTIR sample in Plant B showed the presence of the compounds indicated in Fig. 2, some of which are quantified and

listed in Table 2. Formic acid was only found in plant A at a level of  $1.6 \pm 0.4 \text{ mg/m}^3$ , while the levels of the other compounds were two to three times lower than in plant B. The warehouse at plant C had low pellet levels and an ambient temperature of  $-10^\circ\text{C}$  during sampling. The measured concentrations were below the detection limit for FTIR except for carbon monoxide ( $0.8 \text{ mg/m}^3$ ).

### Domestic storage rooms

The first measurement during 3 months inside a closed but passively ventilated storage bin showed that the emissions increased with the ambient temperature (Fig. 3). The mean aldehyde level was  $21 \pm 7 \text{ mg/m}^3$  and that of carbon monoxide was  $21 \pm 8 \text{ mg/m}^3$  (geometric means). The highest level,  $49 \text{ mg/m}^3$ , was recorded 2 months after delivery of the pellets. The second measurement during the initial 18 h after a new pellet delivery showed considerably higher levels of aldehyde ( $98 \pm 4 \text{ mg/m}^3$ ) and carbon monoxide ( $123 \pm 10 \text{ mg/m}^3$ ). The aldehyde level in the room adjacent to the storage bin reached  $6 \text{ mg/m}^3$  during this period. The mean specific emissions of aldehydes for the two different loads of pellets were 96 and  $703 \text{ mg/ton/day}$ , respectively. The corresponding emissions for carbon monoxide were 100 and  $885 \text{ mg/ton/day}$ . The carbon monoxide levels correlated roughly with the aldehydes, but with a larger diurnal amplitude ( $r^2 = 0.72$ ). Diffusion sampling on Tenax adsorbent inside two domestic houses



**Fig. 2.** GC-MS chromatogram from a Tenax sample also described in Table 2. The identified peaks with retention times are: 3.12, hydrocarbon; 4.19, acetone; 4.36, butanal; 5.02, isopropanol; 5.42, pentanal; 6.57, *a*-pinene; 7.45, *n*-hexanal; 8.67, *b*-pinene; 9.38, carene; 10.23, heptanal; 10.87, hydrocarbon (?); 11.97, methyl-isopropylbenzene; 13.10, octanal; 13.25, 2-heptenal; 14.42, nonanal; 16.00, 2-ethylhexanal; 16.99, benzaldehyde; 19.44, an acid; 21.02, pentanoic acid; 23.38, hexanoic acid; 25.60. Overloading of the sample is shown by the tailing of the peak for hexanal (8.67) and pentanal (6.57). This does not seriously affect the quantification according to laboratory sources.

Table 2. Sampling with Tenax adsorbent on a service walkway in plant A

|                   | mg/m <sup>3</sup> |
|-------------------|-------------------|
| Butanal           | 3.3               |
| Pentanal          | 9.9               |
| Hexanal           | 82.7              |
| Heptanal          | 1.9               |
| 2-Heptenal        | 2.9               |
| Nonanal           | 0.6               |
| Decanal           | n.d.              |
| Terpenes          | 3.6               |
| Toluene           | 0.36              |
| <i>n</i> -Butanol | 1.7               |

n.d., not detected.

adjacent to the closed pellet storage rooms showed raised levels of hexanal (0.056 and 0.084 mg/m<sup>3</sup>), compared with zero levels in a reference sample outdoors.

#### Laboratory tests

The emission during an experiment with a 4 l/min air flow rate through the pellet bed is illustrated in Fig. 4. Aldehydes, methanol, acetone, monoterpenes, hexanoic acid and carbon monoxide were identified. The temperature at the bottom of the pellet bed was 40°C after 20 min, 50°C after 60 min and 60°C after

4 h. A steady temperature range of 72–75°C was reached after ~15 h. A flow rate of 30 l/min yielded 63% more total emissions after 130 h (5728 versus 3475 mg), compared with a flow rate of 4 l/min (Table 3). The total weight of the pellet bed decreased by 580 (30 l/min) and 502 g (4 l/min). The removal of water explains 99% of the weight loss.

Parallel sampling with Air Toxics, Tenax and FTIR for 8 min showed good agreement between the FTIR and Tenax samples, while the Air Toxics sample appeared to underestimate the concentrations (Table 4). Neither acetaldehyde nor its oxidized form acetic acid was detected.

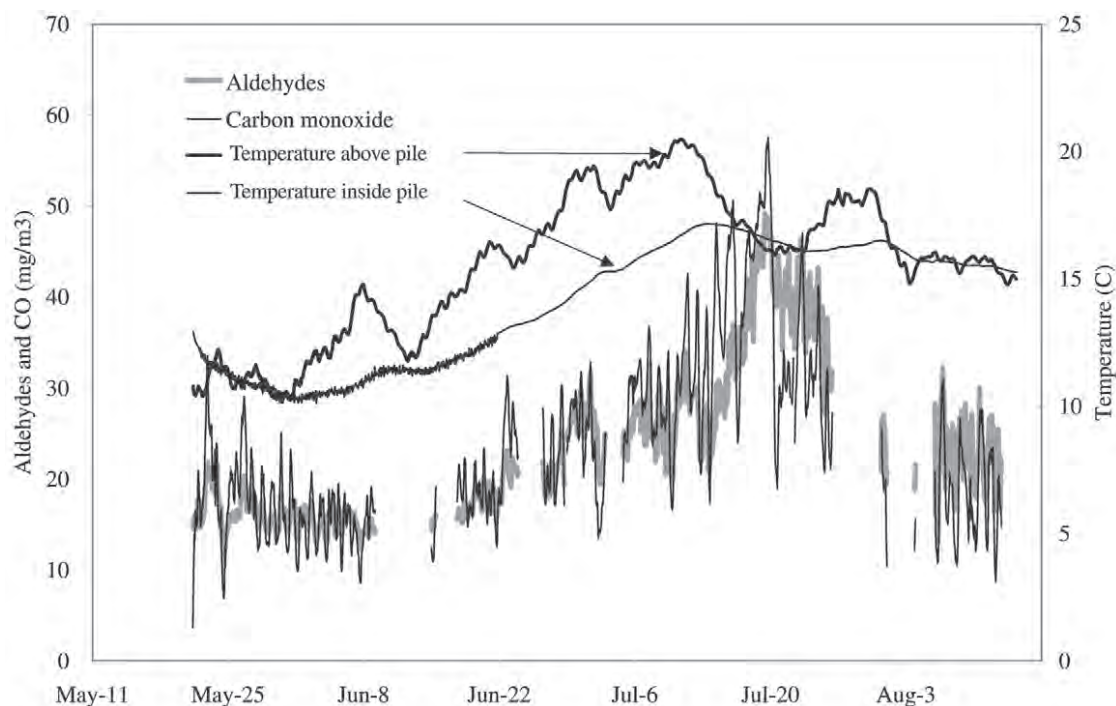
#### Drying of lumber

The gradual formation of aldehydes and carbon monoxide during a complete drying cycle of lumber is described in Fig. 5. The levels were strongly correlated ( $r^2 = 0.96$ ). The formation of other compounds like terpenes, methanol and ethanol were also detected, but are not described further.

## DISCUSSION

#### Emission monitoring

Hexanal and carbon monoxide were found in the emissions from wood pellets and drying of lumber. The levels of carbon monoxide were at times above



**Fig. 3.** Long-term FTIR measurement of aldehydes and carbon monoxide in a domestic storage room.

**Table 3.** Comparison of emissions in a flow-through experiment

|                 | Emitted amount (mg) |          |
|-----------------|---------------------|----------|
|                 | 4 l/min             | 30 l/min |
| Aldehydes       | 1739                | 1800     |
| Hexanoic acid   | 406                 | 2634     |
| Acetone         | 422                 | 294      |
| Methanol        | 118                 | 139      |
| Carbon monoxide | 705                 | 820      |
| Monoterpenes    | 85                  | 41       |
| Total           | 3476                | 5728     |

The samples are from the same batch where the 30 l/min sample was kept in a plastic bag at room temperature for 10 days. Aldehydes are expressed as hexanal equivalents.

the permissible occupational exposure level in the warehouses. The formation of hexanal and carbon monoxide in the experimental studies confirmed the findings of the field studies.

Pentanal, methanol, acetone and formic acid were identified and quantified by the FTIR method. Monoterpenes, other aldehydes and organic acids were found in substantially lower levels and required adsorbent sampling and GC-MS analysis for detection.

During the laboratory experiments the occasional occurrence of formaldehyde was observed at levels close to the detection limit of FTIR. Formaldehyde was not detected in the warehouses but it is likely that

**Table 4.** Parallel sampling during flow-through measurements

|                 | FTIR<br>(mg/m <sup>3</sup> ) | Tenax<br>(mg/m <sup>3</sup> ) | Air Toxics<br>(mg/m <sup>3</sup> ) |
|-----------------|------------------------------|-------------------------------|------------------------------------|
| Butanal         |                              | n.d                           | 1.3                                |
| Pentanal        |                              | 16.3                          | 8.3                                |
| Hexanal         |                              | 48.1                          | 4.9                                |
| Heptanal        |                              | 1.7                           | 0.4                                |
| Octanal         |                              | 1.4                           | 0.1                                |
| Nonanal         |                              | 0.07                          | n.d                                |
| Decanal         |                              | 0.02                          | n.d                                |
| Total aldehydes | 66.6                         | 67.6                          | 15.0                               |

it would be detected using a more sensitive method. The absence of acetaldehyde in the results from the Air Toxics adsorbent samples indicate that high levels of acetaldehyde are not likely to occur in pellet warehouses. The laboratory experiments further showed no significant qualitative difference in the emissions from pellets produced by different drying methods.

Monoterpenes dominate the organic compounds emitted from fresh pine and spruce wood. However, both adsorbent sampling and FTIR results showed low monoterpene concentrations in the warehouses. The conclusion is that the greater part of the monoterpenes is emitted during the production of sawdust in the sawmills and the following storage, grinding and drying processes, before pressing of the pellets. A previous study has shown that the escape of



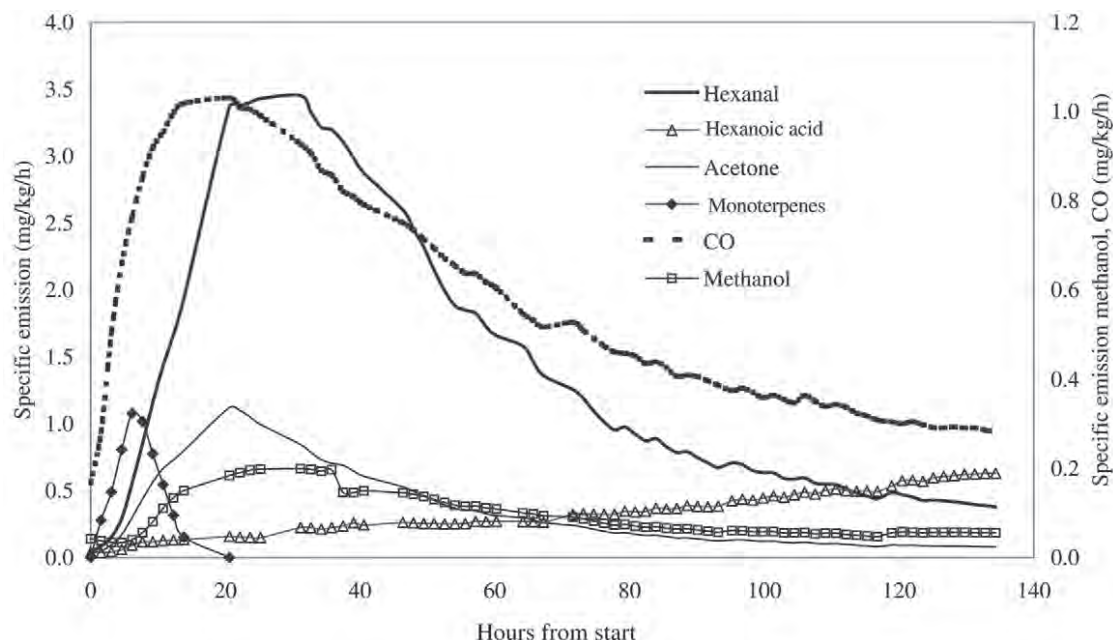


Fig. 4. Specific emissions from 10 kg pellets exposed to 4 l/min airflow.

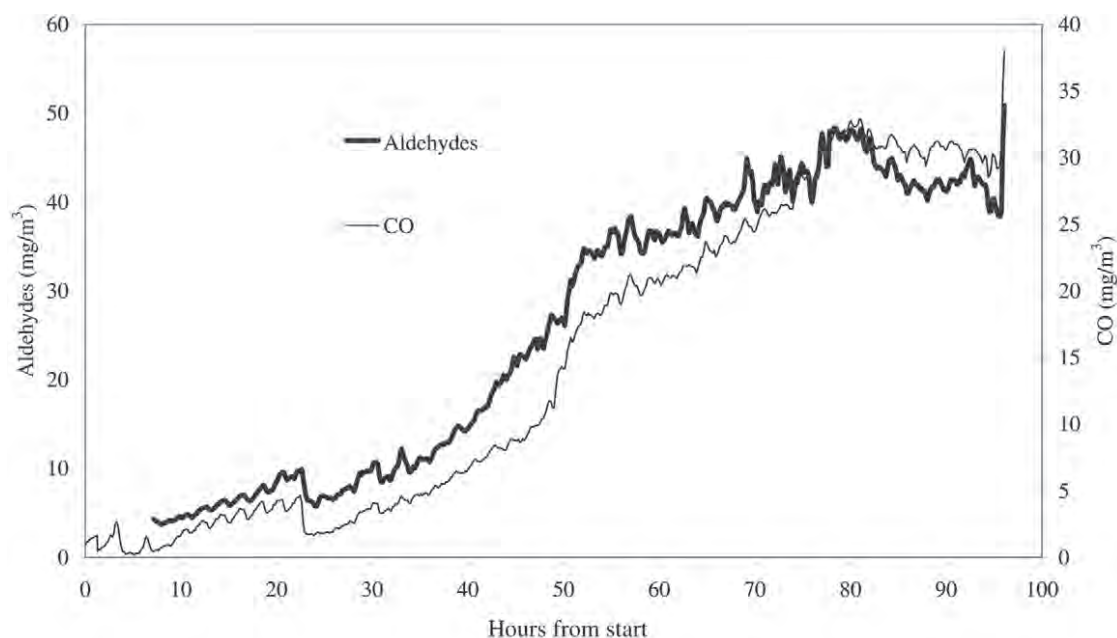


Fig. 5. The concentration of aldehyde and carbon monoxide in emissions from pine lumber drying.

terpenes from sawdust may be rapid (Risholm-Sundman *et al.*, 1998).

Considering the results from lumber drying it is concluded that the dominant emissions from wood pellets originate from general degradation processes in wood, which are initiated or facilitated by drying at elevated temperatures. When the processes take place in a confined space with large amounts of pellets,

leading to a large surface area, the concentration of the emitted compounds may become high. From a working environment perspective the aldehyde levels in the warehouses may become too high. A maximum value of 457 mg/m<sup>3</sup> was recorded at the top of a pellet pile. It is not unlikely that operators may be exposed to such levels while working on the pile, for example, during leveling of the pile with graders and while

sampling temperature data. Carbon monoxide is well known to be toxic (Clayton and Clayton, 1982). The carbon monoxide levels were at times above the Swedish permissible exposure level of 40 mg/m<sup>3</sup> and it may be justified to install carbon monoxide alarms in warehouses and confined storage places which people enter. Formic acid levels sporadically reached 2 mg/m<sup>3</sup> in the warehouse, almost half the permissible exposure level in Sweden.

The laboratory tests with wood pellets identified the same group of compounds as found in the warehouses. The conclusion is that the drying process that takes place in the warehouses is well simulated by the experimental set-up used in the laboratory tests, although not driven to such an extreme. It was assumed that a limited upward air flow also exists inside the pellet piles in the warehouses. Heating of the laboratory sample aimed to resemble the conditions in the warehouse when elevated pile temperatures prevail. The total amount of aldehydes emitted was identical after 130 h, regardless of the flow rate. When all compounds were considered, the result was a higher total emission with the higher flow rate, which is principally explained by the increased emission of hexanoic acid, an oxidation product of hexanal. However, this was not accompanied by a corresponding decrease in the hexanal emission, which would be expected. The formation of degradation compounds may be limited by diffusion of oxygen into the wood structure analogous to what is described for other wood products (Back and Allen, 2000).

The conclusion is that the same compounds that were found in the warehouses caused the odour noticed by the end-user. The episodes with odour from the pellets seem to be more frequent during the winter months, based on informal discussions with end-users. The results show that the emissions vary greatly with different loads of pellets. A plausible explanation is that pellets that are produced, stored and distributed in the warm season have already emitted a large part of their volatile compounds in the warehouses. During the cold season the warehouse storage time of newly produced pellets is short and the emissions are released instead in the storage rooms of the end-users. A poorly designed storage room may cause leakage to the adjacent rooms and constitute a potential exposure risk, as demonstrated by the 6 mg/m<sup>3</sup> level measured outside a storage bin, accompanied by a strong odour. Measurements outside two closed domestic storage rooms, during a period when odour was not reported, indicated levels of hexanal of 0.056–0.085 mg/m<sup>3</sup>, compared with 0–0.005 mg/m<sup>3</sup> normally found in the indoor environment (Brown *et al.*, 1994). The results show that the emissions from a domestic storage room can linger for several months and increase if the ambient temperature increases. If pellets are additionally

vented or stored in the production step, it might reduce emissions in the storage rooms of end-users, however, storing at cold temperatures limits the release of emissions, as demonstrated in Fig. 3. Storage rooms should also be equipped with ventilation systems designed to prevent emissions from entering the living space.

The FTIR method is subject to calibration errors, spectral interference and sampling errors. The calibration error is estimated to be <5% and the error due to spectral interference <10%, but increasing when approaching the LOD. Condensation in sampling lines and leakage from line connections are potential sampling errors. Leakage was checked by periodic monitoring of the flow rate at the sampling tube inlet. Condensation of water was a problem in the kiln drying study. The condensate was therefore collected and analysed separately. The local variation in airborne concentrations in the pellet warehouses was probably the principal factor of measurement uncertainty. The measurements in the kiln dryer, the domestic storage room and in the experimental set-up were not affected by such variations. The present study further shows that the principal risk of relying on adsorbent sampling alone is that essential compounds in the investigated environments are simply not detected.

#### *Formation of hexanal*

Hexanal (CAS no. 66-25-1) was the predominant straight chain aldehyde found in the volatile organic compound mixture emitted from wood pellets. Apart from carbon monoxide, the volatile compounds identified in this report are previously known as low level emittants from wood and wood products and are often identified in indoor air investigations. Medium density fiberboard products (MDF) have been shown to emit hexanal for several months (Brown, 1999). The short chain aldehydes make up >50% of the volatile organic compounds which are emitted from MDF (Baumann *et al.*, 2000).

Hexanal and the other alkanals are probably formed by the oxidative degradation of natural lipids present in wood. The dry woods of Scots pine and Norway spruce contain 3–5% triglycerides and free fatty acids. A polyunsaturated acid, linoleic acid, is the major constituent in the mixture of free fatty acids and triglycerides found in such wood (Hoell and Piezconka, 1978; Piispanen and Saranpaa, 2002). Radical-induced oxidation by oxygen of linoleic acids or its esters yields hexanal as the major volatile component (Back and Allen, 2000). Such reactions can be either enzyme catalysed or occur through a so-called autoxidation process (Schieberle and Grosch, 1981; Frankel *et al.*, 1989; Noordermeer *et al.*, 2001). Because of the high temperature involved in pellet production, with enzyme denaturation as a probable consequence, the major path for this process in pellets most likely proceeds through autoxidation.

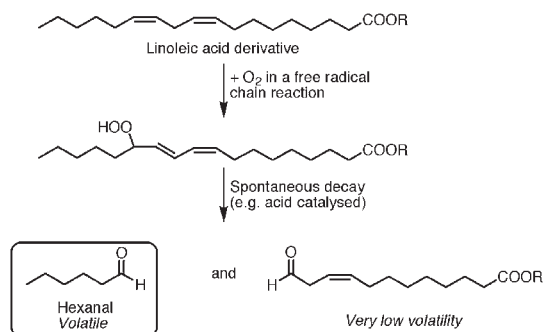


Fig. 6. Proposed pathway for the formation of the volatile aldehyde hexanal in wood pellets.

One possible route leading to hexanal is shown in Fig. 6.

#### Formation of carbon monoxide

The emission of one carbon compounds containing oxygen and hydrogen, such as methanol, formaldehyde and formic acid, from pellets is not surprising. The last two compounds may be autooxidation products of methanol. Other one carbon compounds are carbon monoxide and carbon dioxide. The high levels of carbon monoxide found in each of the measurements presented in this report were unexpected. It is well known that during the thermal anaerobic degradation of wood (pyrolysis) carbon monoxide emission occurs. The low temperature emission of carbon monoxide from wood products such as pellets has not been reported previously and the underlying chemical mechanism is uncertain. Carbon monoxide has a characteristic infrared spectrum and cannot be mistakenly identified. The possible interference of external sources of carbon monoxide was ruled out by the results obtained from laboratory tests with pellets produced by indirect drying (not exposed to drying gases containing carbon monoxide) and the results from the lumber dryer.

When various organic matters were stored at room temperature, particularly in the presence of air and light, small amounts of carbon monoxide were observed and the formation was enhanced by increased temperature (Levitt *et al.*, 1995). Microsomal lipids also produce carbon monoxide during peroxidation, initiated via different Fe(III) complexes. After initiation the reaction appears to be non-enzymatic, i.e. an autooxidative process (Wolff and Bidlack, 1976). Carbon monoxide (300–400 p.p.m.) has been observed in the air above 7000 tons of rapeseed stored in a sealed warehouse and the calculated specific emission rate has been estimated to be 200 mg/ton/day (Reuss and Pratt, 2001). Carbon monoxide has also been found in a wheat grain warehouse with a calculated specific emission rate of 9 mg/ton/day (Whittle *et al.*, 1994). These emission rates can be compared with the specific emission

rates we found in the small pellet storage, ranging from 100 to 885 mg/ton/day.

The more rapid formation of carbon monoxide in materials with a high fat content (rapeseed) compared with those with a low fat content (wheat) indicates that carbon monoxide may be formed through the autooxidative degradation of fats. The measurements in this study indicate that the carbon monoxide and hexanal emissions are often correlated. We suggest that carbon monoxide formation during storage of the wood pellets is caused by the autooxidation of residual lipophilic extractives present in pellets, mainly fats and fatty acids. However, carbon monoxide formation from other organic materials present in wood, like cellulose, hemicellulose and lignin, cannot be ruled out.

#### Toxicology of hexanal

Hexanal was identified as a major component in emissions from wood pellets stored in industrial warehouses and under experimental conditions. Occupational exposure routes for aldehydes include inhalation and skin uptake. Food intake may also contribute to exposure (Feron *et al.*, 1991). Hexanal is rapidly metabolized in the body, the aldehyde being oxidized by aldehyde dehydrogenase to the corresponding acid (Marselos and Lindahl, 1988; Yoshino *et al.*, 1993; Fujita *et al.*, 1994; Townsend *et al.*, 2001). This seems to be the dominant metabolic route, but reduction of hexanal to the alcohol has also been suggested (Jaar *et al.*, 1999).

Low molecular weight aldehydes are strongly irritant to the mucous membranes in the nose, mouth and airways in humans (Clayton and Clayton, 1981). In eye irritation tests on rabbits hexanal was given grade 5 on a 10 grade scale (Grant, 1986). There are some reports concerning the genotoxicity of hexanal, however, most authors conclude that the risk to humans is negligible (Marinari *et al.*, 1984; Brambilla *et al.*, 1989; Martelli *et al.*, 1994).

Hexanal has cytotoxic potential in most cells tested but only in relatively high doses (Kaneko *et al.*, 1988; Martelli *et al.*, 1994; Muller *et al.*, 1996; Girona *et al.*, 2001). It should be noted, however, that *in vitro* studies suggest that insulin-producing cells in pancreas and sperm might be more sensitive than other cell types (Suarez-Pinzon *et al.*, 1996).

It is not possible to define a critical effect for hexanal. However, the high readings for hexanal and the relatively low readings for other emissions, as well as a general knowledge of the irritating effects of aldehydes, suggest that hexanal in the present settings can cause skin and mucous irritations and possibly also other health problems. As indicated in the Introduction, complaints about odour and irritation have been reported among exposed workers, but the frequency as compared with that in control groups is not known.

## Conclusions

High levels of hexanal and carbon monoxide were strongly associated with storage of wood pellets and may constitute an occupational and domestic health hazard. The results from lumber drying show that the emissions of hexanal and carbon monoxide are not limited to wood pellets but are caused by general degradation processes of wood, facilitated by drying at elevated temperature. Emission of carbon monoxide from wood materials at low temperatures (<100°C) has not previously been reported in the literature. We postulate that carbon monoxide is formed due to autoxidative degradation of fats and fatty acids. The depletion of oxygen and simultaneous formation of carbon monoxide may be particularly dangerous in closed spaces.

A toxicological literature survey showed that the available scientific information on hexanal is insufficient to determine the potential risks to health. However, the data presented in this paper seem sufficient to undertake preventive measures to reduce exposure to hexanal both in the industrial environment as well in the domestic setting, where children and sensitive persons may be involuntarily exposed.

**Acknowledgements**—The study was financed by a grant from the Swedish Energy Agency and by Västernorrland County Council, Sweden. The authors would like to thank Christer Edling, Tony Waldron and Kåre Eriksson for valuable comments.

## REFERENCES

- Back EL, Allen LH. (2000) Pitch control, wood resin and deresination. Atlanta: Tappi Press.
- Baumann MGD, Lorenz LF, Batterman SA, Zhang G-Z. (2000) Aldehyde emissions from particleboard and medium density fiberboard products. *Forest Prod J*; 50: 75–82.
- Brambilla G, Cajelli E, Canonero R, Martelli A, Marinari UM. (1989) Mutagenicity in V79 Chinese hamster cells of n-alkanals produced by lipid peroxidation. *Mutagenesis*; 4: 277–9.
- Brown SK. (1999) Chamber assessment of formaldehyde and VOC emissions from wood-based panels. *Indoor Air*; 9: 209–15.
- Brown SK, Sim MR, Abramson MJ, Gray CN. (1994) Concentrations of volatile organic compounds in indoor air—a review. *Indoor Air*; 4: 123–34.
- Clayton GD, Clayton FE. (1981) *Patty's industrial hygiene and toxicology*, 3rd edn. New York: John Wiley & Sons. ISBN 0-471-16042-3
- Clayton GD, Clayton FE. (1982) *Patty's industrial hygiene and toxicology*, 3rd edn. New York: John Wiley & Sons. ISBN 0-471-09258-4
- Feron VJ, Til HP, de Vrijer F, Woutersen RA, Cassee FR, van Bladeren PJ. (1991) Aldehydes: occurrence, carcinogenic potential, mechanism of action and risk assessment. *Mutat Res*; 259: 363–85.
- Frankel EN, Hu ML, Tappel AL. (1989) Rapid headspace gas chromatography of hexanal as a measure of lipid peroxidation in biological samples. *Lipids*; 24: 976–81.
- Fujita M, Sano M, Yoshino K, Tomita I. (1994) Effects of aldehyde dehydrogenase and glutathione on the degradation of (E)-4-hydroxy-2-nonenal and N-hexanal in rat liver. *Biochem Mol Biol Int*; 32: 429–34.
- Girona J, Vallve JC, Ribalta J, Heras M, Olive S, Masana L. (2001) 2,4-Decadienal downregulates TNF- $\alpha$  gene expression in THP-1 human macrophages. *Atherosclerosis*; 158: 95–101.
- Grant M. (1986) *Toxicology of the eye*, 3rd edn. Springfield, IL: Charles C Thomas. ISBN 0-398-05184-4.
- Hoell W, Piezconka K. (1978) Lipids in the sap and heartwood of *Picea abies* (L.) Karst. *Z Pflanzphysiol*; 87: 191–8.
- Jaar V, Ste-Marie L, Montgomery JA. (1999) Striatal metabolism of hexanal, a lipid peroxidation product, in the rat. *Metab Brain Dis*; 14 (2): 71–82.
- Kaneko T, Kaji K, Matsuo M. (1988) Cytotoxicities of a linoleic acid hydroperoxide and its related aliphatic aldehydes toward cultured human umbilical vein endothelial cells. *Chem Biol Interact*; 67: 295–304.
- Levitt MD, Ellis C, Springfield J, Engel RR. (1995) Carbon monoxide generation from hydrocarbons at ambient and physiological temperature: a sensitive indicator of oxidant damage? *J Chromatogr*; 695: 324–8.
- Marinari UM, Ferro M, Sciaba L, Finollo R, Bassi AM, Brambilla G. (1984) DNA-damaging activity of biotic and xenobiotic aldehydes in Chinese hamster ovary cells. *Cell Biochem Funct*; 2: 243–8.
- Marselos M, Lindahl R. (1988) Substrate preference of a cytosolic aldehyde dehydrogenase inducible in rat liver by treatment with 3-methylcholanthrene. *Toxicol Appl Pharmacol*; 95: 339–45.
- Martelli A, Canonero R, Cavanna M, Ceradelli M, Marinari UM. (1994) Cytotoxic and genotoxic effects of five n-alkanals in primary cultures of rat and human hepatocytes. *Mutat Res*; 323: 121–6.
- Muller K, Hardwick SJ, Marchant CE, *et al.* (1996) Cytotoxic and chemotactic potencies of several aldehydic components of oxidised low density lipoprotein for human monocyte-macrophages. *FEBS Lett*; 388: 165–8.
- Noordermeer MA, Veldink GA, Vliegthart JF. (2001) Fatty acid hydroperoxide lyase: a plant cytochrome p450 enzyme involved in wound healing and pest resistance. *Chembiochem*; 2: 494–504.
- Piispänen R, Saranpää P. (2002) Neutral lipids and phospholipids in Scots pine (*Pinus sylvestris*) sapwood and heartwood. *Tree Physiol*; 22: 661–6.
- Reuss R, Pratt S. (2001) Accumulation of carbon monoxide and carbon dioxide in stored canola. *J Stored Products Res*; 37: 23–4.
- Risholm-Sundman M, Lundgren M, Vestin E, Herder P. (1998) Emissions of acetic acid and other volatile compounds from different species of solid wood. *Holz Roh- Werkstoff*; 56: 125–9.
- Schieberle P, Grosch W. (1981) Model experiments about the formation of volatile carbonyl compounds. *J Am Oil Chem Soc*; 58: 602–7.
- Suarez-Pinzon WL, Strynadka K, Rabinovitch A. (1996) Destruction of rat pancreatic islet beta-cells by cytokines involves the production of cytotoxic aldehydes. *Endocrinology*; 137: 5290–6.
- Svedberg U, Galle B. (2000) Assessment of terpene levels and workers' exposure in saw mills with long path FTIR. *Appl Occup Environ Hyg*; 15: 686–94.
- Svedberg U, Galle B. (2001) Användning av FTIR teknik för bestämning av gasformiga emissioner vid träpellets-tillverkning (in Swedish). Stockholm: Värmeforsk Service AB, Report no. 735.
- Townsend AJ, Leone-Kabler S, Haynes RL, Wu Y, Szweda L, Bunting KD. (2001) Selective protection by stably transfected human ALDH3A1 (but not human ALDH1A1) against toxicity of aliphatic aldehydes in V79 cells. *Chem Biol Interact*; 130/132: 261–73.



- Whittle CP, Waterford CJ, Annis PC, Banks HJ. (1994) The production and accumulation of carbon monoxide in stored dry grain. *J Stored Products Res*; 30: 23–6.
- Wolff DG, Bidlack WR. (1976) The formation of carbon monoxide during peroxidation of microsomal lipids. *Biochem Biophys Res Commun*; 73: 850–7.
- Yoshino K, Sano M, Hagiwara M, Fujita M, Tomita I. (1993) Accumulation of (E)-4-hydroxy-2-nonenal and n-hexanal, degradation products of lipid peroxides, in mouse lung and liver. *Biol Pharm Bull*; 16: 84–6.



[https://www.djournal.com/monroe/news/amory-board-of-aldermen-discusses-deficit-dust-complaints-and-a-tank/article\\_1235224f-4658-579f-85c8-609efabbae0e.html](https://www.djournal.com/monroe/news/amory-board-of-aldermen-discusses-deficit-dust-complaints-and-a-tank/article_1235224f-4658-579f-85c8-609efabbae0e.html)

## **Amory board of aldermen discusses deficit, dust complaints and a tank**

jward  
Oct 13, 2016

---

AMORY – The majority of the time during the Oct. 4 board of aldermen meeting was devoted to revisiting an item tabled from its last meeting. Tracy Hadley, representing the local Order of the Eastern Star, returned to continue her petition to the board for waiver of rental fee to use community center space for their meetings.

The petition launched a wide-ranging discussion of the financial standing of the city's community centers. City clerk Lee Barnett provided reports, stating most of the city's revenue to operate the facilities is derived from space rentals.

The bad news was that the rent collected has not even come close to paying the cost of utilities, let alone salaries and maintenance – to the tune of \$24,000 in the red for the past year. Barnett went on to say that the expenses to operate the West Amory Community Center were more than its East Amory counterpart due to the fact that East Amory Community Center was equipped with a newer, more energy-efficient HVAC system.

“If we keep giving stuff away, how can we continue to operate,” asked Ward 4 Alderman Glen Bingham, citing a long previous record of helping community service providers with free or reduced rent.

He asked Hadley if the \$30 rent is an excessive fee. She said she would take the matter back to her board to reconsider its request to the city but asked whether other nonprofit community service groups would be asked to step up and pay rent to which Bingham replied, “Yes.”

The discussion branched out even further to explore community response to enhancements at East Amory Community Center, located in a predominantly white neighborhood, as opposed to West Amory, where the population of the service area is predominantly African-American.

Hadley emphasized that equal treatment to both centers was vital to prevent racial friction in the city.

“A lot of issues are due to ignorance of the facts, not race,” Hadley said.

Ward 2 Alderman John Darden said that people who don't go to meetings need to be informed of events such as church services.

“The problem is perception. Effective communication is the key,” said Mayor Brad Blalock, who pledged to meet with Hadley and Amory Park and Recreation Director Rory Thornton to work out suitable arrangements for the Eastern Star chapter as well as other nonprofit community groups that would follow suit.

As the discussion wound down, the motion to grant Hadley's request for a fee waiver died for lack of a second to Darden's motion.

Another scheduled guest appearance from Monroe County Veteran's Association representative Carolyn Goldsboro presented to the city a very unusual proposition. An M60A1 Patton battle tank from the deactivated Nettleton National Guard Armory was offered to the City of Amory for adoption at no cost if the city could provide a site.

Goldsboro provided a visual of not only the tank but a map showing the proposed location on a city-owned island across Highway 278 from the existing Veteran's Memorial near Wilkerson's Furniture. The development of the site would consist primarily of the installation of a suitable concrete pad for the 50-ton tank.

Goldsboro said the veteran's group would approach local contractor Hob Sanderson about donating the concrete for the project. Blalock expressed his support for the initiative, as did Amory Police Chief Ronnie Bowen, who didn't foresee any traffic issues that might result from locating the tank at the site.

Goldsboro added that funds are in place for landscaping the site once the installation is complete. Further action on this item is pending.

Finally, Darden relayed complaints from residents of his ward, who he said are wheezing, coughing and constantly washing the dust off of their vehicles generated by the Enviva pellet plant.

Blalock responded that while the plant was in compliance with Mississippi Department of Environmental Quality (MDEQ) standards, he would follow up on looking into any remedies possible, while the area still waits for relief from the extended hot and dusty summer conditions.

Amory Street Department Director David Moore added that recently, the prevailing winds have been easterly, causing more dust over sections of Ward 2.

Ironically, Enviva's introductory statement on its website proclaims its mission is to "develop a cleaner energy alternative to fossil fuels." It continues to say, "We work for lower emissions, healthy forests and strong communities."

While the emissions may not be environmentally threatening, the funnel cloud of dust over the plant can be unsettling when seen reaching into another cloud above, and the dust by-product persists for the time being.

Local officials at Enviva did not return request for comment.



# Exposures to Carbon Monoxide from Off-Gassing of Bulk Stored Wood Pellets

Lydia Soto-Garcia, Xinrui Huang, Devraj Thimmaiah, Alan Rossner, and Philip K. Hopke\*

Center for Air Resources Engineering and Science, Clarkson University, Potsdam, New York 13699, United States

## S Supporting Information

**ABSTRACT:** There has been a significant increase in use of wood pellets in residential and commercial scale boiler systems within New York State, such an increase will lead to increased storage of bulk pellets in homes and buildings. Serious accidents in Europe have been reported over the past decade in which high concentrations of carbon monoxide (CO) have been found in bulk pellet storage bins. Thus, additional exposure data for CO in pellet bin storage areas are needed to assess the potential hazards. Using calibrated CO sensors, continuous CO measurements were made from the spring 2013 to spring 2014 in a number of wood pellet storage bins in New York State. The CO sensors, in some cases, in conjunction with sensors for CO<sub>2</sub>, O<sub>2</sub>, relative humidity, and temperature, were installed in a residential basement, an external storage silo, and several boiler room storage areas in schools and a museum. Peak concentrations in these pellet storage locations ranged from 14 ppm in the basement residence to 155 ppm inside the storage silo at a school. One-hour CO concentrations in the boiler rooms were typically 10–15 ppm. The measured concentrations were compared to regulatory standards of 50 ppm and recommended guidelines of 35 and 9 ppm for work and nonworking environments, respectively. The concentrations at the three locations in the middle school never exceeded the 35 ppm guideline. At the museum, the CO concentrations after pellets delivery did reach a maximum of 55 ppm for a 1-h average. However, high concentrations remained for only 4 days due to natural ventilation in this storage location. Storage areas for pellets must be considered confined spaces and require appropriate entry procedures. As the biomass heating with pellets becomes more prevalent, improved designs for storage bins must be considered to minimize the risk of exposure to CO to building occupants.

## ■ INTRODUCTION

The rise in fossil fuels costs, the need of energy security, and the desire for clean and renewable energy has stimulated the use of alternative heating fuels. Wood pellets are a biofuel that has gained popularity in many places, such as the Northeastern United States.<sup>1,2</sup> The New York State Energy Research and Development Authority (NYSERDA) has initiated multiple demonstration projects to introduce advanced wood-pellet fired boilers into New York State (NYS) including a European-built 150 kW (500 MBTU/h) wood pellet boiler installed at the Walker Center at Clarkson University and a 500 kW (1.7 MMBTU/h) installed at the Wild Center Museum in Tupper Lake, NY.

Storage of bulk wood pellets can involve a variety of storage bins. Many pellet bin configurations have been developed, including bins within the structure and bins external to the building. Supporting Information Figure S1 shows an external pellet silo. Interior bins can be configured in a number of ways as shown in Supporting Information Figures S2–S6. The most common storage bin designed for homes is the fabric storage bins (Supporting Information Figure S6). The best storage bin for a building depends on the budget, space available, among other factors. The bins can range in size according to the consumer needs from 3 tons to more than 100 tons.

The storage of wood pellets in confined spaces produce various gases including carbon monoxide (CO), carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and volatile organic carbons (VOCs)<sup>3–6</sup> that will accumulate in the air and can potentially reach toxic levels. Fatal accidents have been reported on

maritime vessels providing bulk transport of wood pellets<sup>7,8</sup> and in large pellet storerooms of private households in Europe.<sup>9</sup> Thus, it is important to understand the potential health threat posed by stored pellets.

Elevated levels of CO can cause serious illness and death of exposed people. The adverse health effects associated with CO vary with its concentration and duration of exposure.<sup>10,11</sup> The most important health effects associated with exposure to CO are due to its strong bond with the hemoglobin molecule, forming carboxy-hemoglobin (COHb). COHb impairs the oxygen-carrying capacity of the blood, putting a strain on tissues with high oxygen demand, such as the heart and the brain.<sup>10–13</sup> Health effects observed from exposure to 10–2500 ppm of CO include early onset of cardiovascular disease, behavioral impairment; decreased exercise performance, reduced birth weight, sudden infant death syndrome, increase daily mortality rate, serious headache, dizziness, nausea, unconscious, convulsions, and death, among others.<sup>10,11,14</sup> In order to protect people's health, a COHb level of 2.5% should not be exceeded.<sup>10</sup> Recommended guidelines for homes are 9 ppm of CO averaged over 8 h as proposed by American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) and the World Health Organization (WHO). The National Institute of Occupational Safety and Health (NIOSH) guideline for work environments is 35 ppm over 8 h

**Received:** September 19, 2014

**Revised:** December 13, 2014

**Published:** December 16, 2014

**Table 1. Sites of the Pellets Bin in Use, Theirs Sizes, Time of Monitoring, Description of Place Being Monitor, and Types of Sensor Being Deployed to Monitor Pellet Emissions**

| No. | site                                                 | storage capacity (ton)               | time of monitoring                                          | sensor location                   | monitoring sensors                               |
|-----|------------------------------------------------------|--------------------------------------|-------------------------------------------------------------|-----------------------------------|--------------------------------------------------|
| 1   | residential basement at Massena                      | 10                                   | March 5, 2013–April 18, 2014                                | basement near storage bag         | CO                                               |
| 2   | Malone Middle School, Malone                         | room capacity of 100, filled with 20 | Sept. 27, 2013–April 23, 2014                               | air flow from room bin (air duct) | CO and PM                                        |
|     |                                                      |                                      | Feb. 27, 2013–April 22, 2013; Oct. 2, 2013–April 23, 2014   | hallway near bin                  | CO                                               |
|     |                                                      |                                      | Feb. 27, 2013–April 22, 2013; Sept. 27, 2013–April 23, 2014 | boiler room                       | CO                                               |
| 3   | Saranac Lake Petrova Elementary School, Saranac Lake | 20                                   | March 27, 2013–April 22, 2013                               | boiler room                       | CO                                               |
|     |                                                      |                                      | March 27, 2013–April 22, 2013; Aug. 27, 2013–April 22, 2012 | silo                              | CO                                               |
| 4   | Wild Center Museum, Tupper Lake                      | 30                                   | Sept. 27, 2013–Oct. 22, 2013                                | pellet bin                        | CO, CO <sub>2</sub> , O <sub>2</sub> , RH, and T |
| 5   | Walker Center, Clarkson University, Potsdam          | 10                                   | Sept. 21, 2013–April 25, 2014                               | pellet bin                        | CO, CO <sub>2</sub> , O <sub>2</sub> , RH, and T |
| 6   | Energy Cabin, Clarkson University, Potsdam           | 3                                    | Sept. 18, 2013–April 23, 2014                               | pellet bin                        | CO, CO <sub>2</sub> , O <sub>2</sub> , RH, and T |

while the Occupational Safety and Health Administration (OSHA) has established a standard of 50 ppm over 8 h that is not to be exceeded. More detailed information on CO health effects and recommended maximum exposures is provided in the Supporting Information and Table S1.

The CO generation in bulk storage bins, such as the ones in this study, is the result of an oxidation process of the wood pellets that produces CO, CO<sub>2</sub>, CH<sub>4</sub>, and VOCs.<sup>4,5</sup> The nature of this process still needs to be determined. Prior studies found the process to be mass, temperature, moisture content, and volume dependent.<sup>5–7</sup> In addition, it has been hypothesized that the mechanism of formation of VOCs is due to the oxidation of fatty/resin acids by observing the emitted amount of aldehydes and ketones decreased by 45% during storage.<sup>15</sup> However, that study does not relate any of these carbonyl concentrations to the CO emissions, raising the question of how the CO is formed. Other research has related the CO emissions to microbial activities in the wood pellets and wood chips.<sup>9,16</sup> However, wood pellets are dried at around 500 °C in the production process and have a low water content (<7%) that creates unfavorable conditions for microbiological activity.<sup>9</sup>

In an attempt to understand the emission rates of stored wood pellets and be able to predict indoor concentrations, Fan and Bi studied the kinetics of CO off-gassed from stored wood pellets in small containers and developed a model that predicts the CO emissions per unit mass of stored pellets.<sup>17</sup> While Fan and Bi's model provided a framework for understanding the emission rates, validation of the model is still necessary particularly since the only data they employed was for softwood pellets. Models can never account for all aspects of an in situ situation (actual environments). Hence, field sampling is necessary to characterize the actual airborne CO concentrations in in-use systems. The purpose of this study is to characterize the potential exposures of CO from bulk storage pellets used in different typical U.S. storage systems, including in-use bins in schools, work places, and a residence.

## ■ EXPERIMENTAL DETAILS

**Sampling Sites.** Six different pellet bins were monitored during this study: the Walker Center and Energy Cabin at Clarkson University, the Wild Center Museum in Tupper Lake, NY, Malone Middle School in Malone, NY, Petrova Elementary School in Saranac Lake, NY, and a residential basement in Massena, NY. In several cases,

multiple monitors were deployed to assess leakage of CO from the storage bins into normally occupied spaces. Table 1 summarizes the specific sites together with the monitoring system deployed.

**Monitoring Systems.** Sensor systems were constructed from commercially available gas sensors as described in Table 2 and the Supporting Information for this report. Two types of systems were developed. One system included only a CO sensor and in the other, CO, CO<sub>2</sub> and O<sub>2</sub> as well as temperature (T) and relative humidity (RH) were measured.

The systems were then deployed into the various locations monitored. At the Petrova Elementary School, the pellet storage system is a silo external to the building with 20 tons capacity. The sensor was connected at the end of the pneumatic delivery tube as shown in Supporting Information Figure S1.

For Malone Middle School, the CO and particulate matter (PM) sensors were placed in an air duct constructed to ventilate the storage bin at this site. The air in the duct should be representative of the concentrations within the bin. Supporting Information Figure S2 shows the CO and PM monitor connected into the side of the duct.

The more complete sensor systems were placed into the Walker Center pellet bin with 10 ton capacity (Supporting Information Figure S3), the container that serves as the pellet bin at the Wild Center with 30 ton capacity (Supporting Information Figure S4) and into the Energy Cabin pellet bin at Clarkson University with 3 tons capacity (Supporting Information Figure S5).

A monitor was placed in the basement of a home heated with a wood pellet boiler (Supporting Information Figure S6). The pellets are stored in a 10 ton gas permeable bag storage system. This bag system is a commercially available storage system that has been commonly installed in homes although more commonly as a 3 ton system rather than this 10 ton facility.

The monitoring systems came online at various times. The Massena, Saranac Lake, and Malone sites started in spring 2013. Most locations consumed their pellets by the end of April 2013 so there were little or no pellets in most of the storage facilities over the summer, so no monitoring was performed. New pellets were obtained at the end of the summer 2013 with different locations starting their monitoring (Tupper Lake and Potsdam sites) for the first time during summer 2013 and getting deliveries at different times until April 2014. The sampling dates are provided in Table 1. All of the CO concentration presented here are 1-h averages in order to understand the dynamics of the CO build up in storage bins. However, the 8-h guidance values are shown for reference since they provide conservative values. The 8-h average values that exceed the guidance levels are discussed since most of the sampling sites are occupational spaces. Only the Massena residence and the Energy Cabin at Clarkson University are nonworking environments.



Table 2. Sensors and Their Respective Performance Used for This Field Study

| sensors ID                                    | measurement                       | detection limit                                                      | accuracy                                                                               | reproducibility                                                                        | range of detection                   |
|-----------------------------------------------|-----------------------------------|----------------------------------------------------------------------|----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|--------------------------------------|
| Vaisala Model HMT120 <sup>a</sup>             | temperature and relative humidity | %RH: 0 (4 mA) $T$ (°C): -50                                          | 0–90%: $\pm 3.0\%$ RH 90–100%: $\pm 4.0\%$ RH -40 to +0, +40 to +80 °C: $\pm 0.4$      | $\pm 2\%$ RH for 2 years.<br>$T$ (°C): not reported                                    | %RH: 0–100<br>$T$ (°C): -40 to 80    |
| City Tech T3E/F <sup>b</sup>                  | CO (ppm)                          | 4–20 mA d.c. 0.10 $\pm$ 0.02 $\mu$ A/ppm                             | <9 ppm equiv.<br>maximum error in the 0–25% range is 0.5% at around 10% O <sub>2</sub> | linear range, 1 ppm<br>linear range, 0.1% vol                                          | 0–500<br>0–25%                       |
| T70XV C/TiceL <sup>b</sup>                    | % O <sub>2</sub>                  | 4–20 mA d.c., (0.0 $\pm$ 0.5)% just accounting for the maximum error |                                                                                        |                                                                                        |                                      |
| IRceL Evaluation Kit <sup>b</sup>             | %CO <sub>2</sub>                  | 0–1 V, 0%                                                            | -20 °C TO +50 °C: $\pm$ (0.1% vol CO <sub>2</sub> + 4% of concn.)                      | < $\pm$ 0.075% CO <sub>2</sub> (at all range) < $\pm$ 0.003% CO <sub>2</sub> (at zero) | 0–5%                                 |
| AEROCET 831 Aerosol Mass Monitor <sup>c</sup> | PM1, PM2.5, PM4 and PM10          | 0 $\mu$ g/m <sup>3</sup>                                             | $\pm 10\%$ calibration aerosol                                                         | 0.5 $\mu$ m/0.1 $\mu$ g·m <sup>-3</sup>                                                | 0–1000 $\mu$ g/m <sup>3</sup> ·1 min |

<sup>a</sup><http://www.vaisala.com/>. <sup>b</sup><http://www.citytech.com/>. <sup>c</sup><http://www.metone.com/particulate-831.php/>

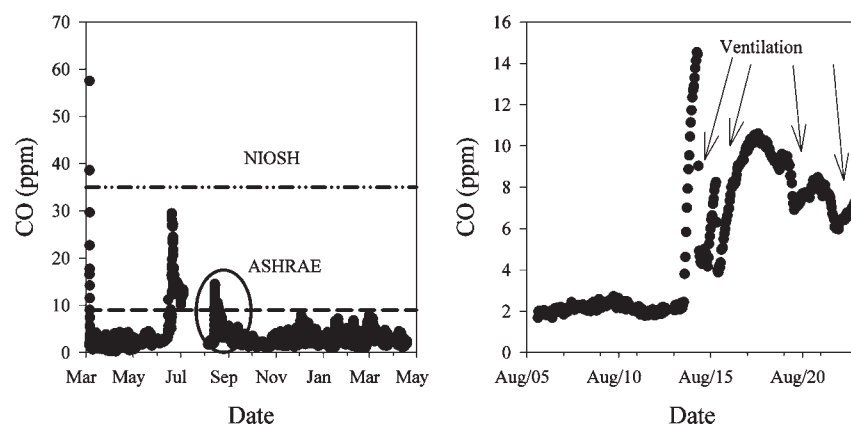
## RESULTS AND DISCUSSION

**Massena Residence.** The measurements in the Massena residence started on March 5, 2013 as shown in Figure 1a). Based on health guidelines presented in Supporting Information Table S1, 8-h exposure guidance levels of 9 and 35 ppm, respectively, are highlighted with dash-dot lines in all of the presented results. An initial spike of  $\sim 60$  ppm of CO was observed. Subsequently, the values decreased to less than 9 ppm (ASHRAE threshold limit) for the rest of the spring 2013 heating season. In June, a rise in CO was observed although there was only a small quantity of pellets ( $\sim$ less than a ton) in storage as reported by the owner. Thus, the origin of this peak is not understood. The sensor was tested and recalibrated and reconnected on Aug. 2. Fresh softwood pellets were added to the storage bin in August. Figure 1b highlights this period. Concentrations above 9 ppm were observed, but as reported by the house owner, ventilation was applied because of the intense VOC odors emitted by the pellets. The concentration of CO decreased to below 9 ppm in less than 3 days and throughout the winter heating season with the measurements ending on April 18, 2014. Clearly, the ventilation (natural and/or mechanical) together with the difference in temperature (inside and outside the storage) reduced the concentration of CO as suggested by Emhofer.<sup>18</sup>

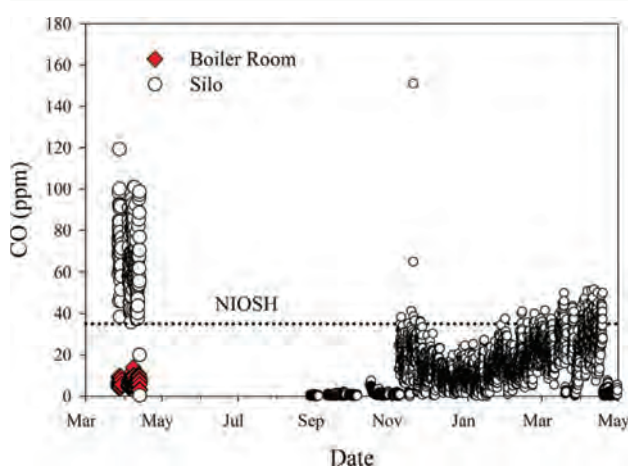
**Petrova Elementary School.** At the Petrova Elementary School in Saranac Lake, the storage bin is an outdoor silo (Supporting Information Figure S1) with a CO sensor at the bottom. In the spring of 2013, CO was monitored at the silo and at the containerized boiler room, and then, from the end of August 2013, only the silo was monitored. The monitoring at two sites was performed to check for leaks from the silo into the boiler room.

Figure 2 shows a 1-h CO value of approximately 20 ppm in the boiler room (maximum of 14 ppm for 1-h and 9 ppm for 8-h average), below the occupational guidelines, and up to approximately 155 ppm in the silo that is well above the guidelines and standards. By April 15, 2013, most of the pellets had been consumed and the concentrations returned to background conditions (<5 ppm). In the summer of 2013, the sensors were recalibrated and installed in just the silo. New pellets were delivered in October 2013. Concentrations at the silo rose to approximately 50 ppm in average, and only in one occasion reached to approximately 150 ppm. The values might be lower than previous heating season because of colder condition or pellets had an opportunity to age before they were delivered to the site. However, clearly enclosed silos such as this one need to be treated as confined spaces as per OSHA regulations if maintenance is required.

**Malone Middle School.** The Malone school uses the space in the basement that had been the coal bin for pellet storage. This bin had an active ventilation system producing a flow of 300 cubic feet meter. Three CO sensors were installed in this facility along with a particulate matter monitor (PM). One of the CO sensors was placed in hallway near the entrance door to the bin. A second sensor was deployed in the area around the two 1 MMBTU/h boilers. The third CO sensor and the PM monitor were installed in the outlet duct for the ventilation system (Supporting Information Figure S2). Data were collected in the spring of 2013 at the hallway and boiler room only. CO concentration increases as spikes between 10 and 15 ppm during the month of April for data averaged for 15 min and 1 h. The spikes lasted for less than an hour. It is likely



**Figure 1.** (a) CO measurement at the Massena Residence Basement (March 2013–April 2014). Dashed line refers to the ASHRAE limit (9 ppm of CO) and dotted line to NIOSH guidance level of 35 ppm of CO. (b) Time series (August 2–23, 2013) of CO measurement enlarged (inside the circle) from part a).



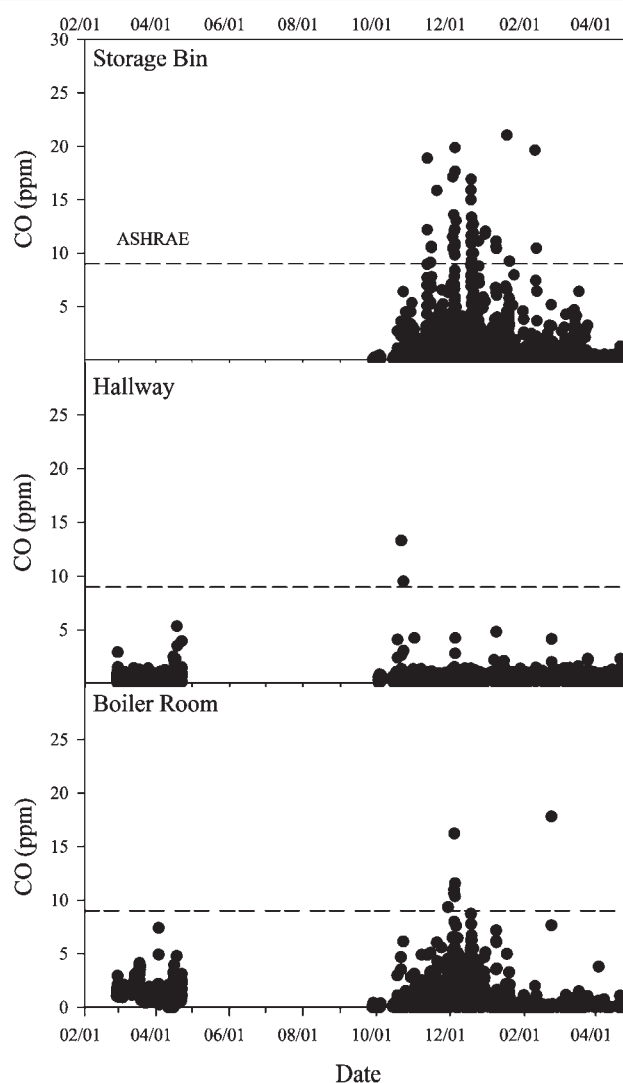
**Figure 2.** Time series of CO measurements inside the boiler room and pellet silo located outside of the Petrova Elementary School.

that the high CO concentrations were due to other causes (gasoline powered equipment brought in from outdoors and still operating) and not due to the storing of wood pellets.

The sensors were returned to the laboratory for calibration and reinstall at the end of September and beginning of October 2013. Figure 3 shows the 1-h average CO concentrations at the three locations in the school basement. Peaks of CO were observed in the month of October that were reported as a result of storing and operating various gasoline-powered grounds keeping equipment in the hallway where the motors might be running as they moved them in from outside the building.

There were no pellets in the bin until November fourth when the first delivery of the season was made. At the hallway door, there are 6 peaks that correlate with high concentrations of CO in the air duct ventilation, but they were only spikes for short periods of less than 5 ppm. The pattern in boiler room from November until December suggest that the two boilers were leaking CO or that there might be a leak from storage bin to the boiler room. However, concentrations never exceeded the NIOSH recommendation (35 ppm) and OSHA limits (50 ppm) for occupational space. From the end of January, these concentrations diminished to well below guideline levels.

Since the delivery of the wood pellets generate combustible wood dust, it was imperative to measure the concentration of



**Figure 3.** Time series of CO measurements at three locations (storage bin, hallway, and boiler room) in Malone Middle School.

particles generated at this site. One of the major contributors to the risk of an explosion is the size of the dust particles. In general, the finer the combustible particle is the higher the risk

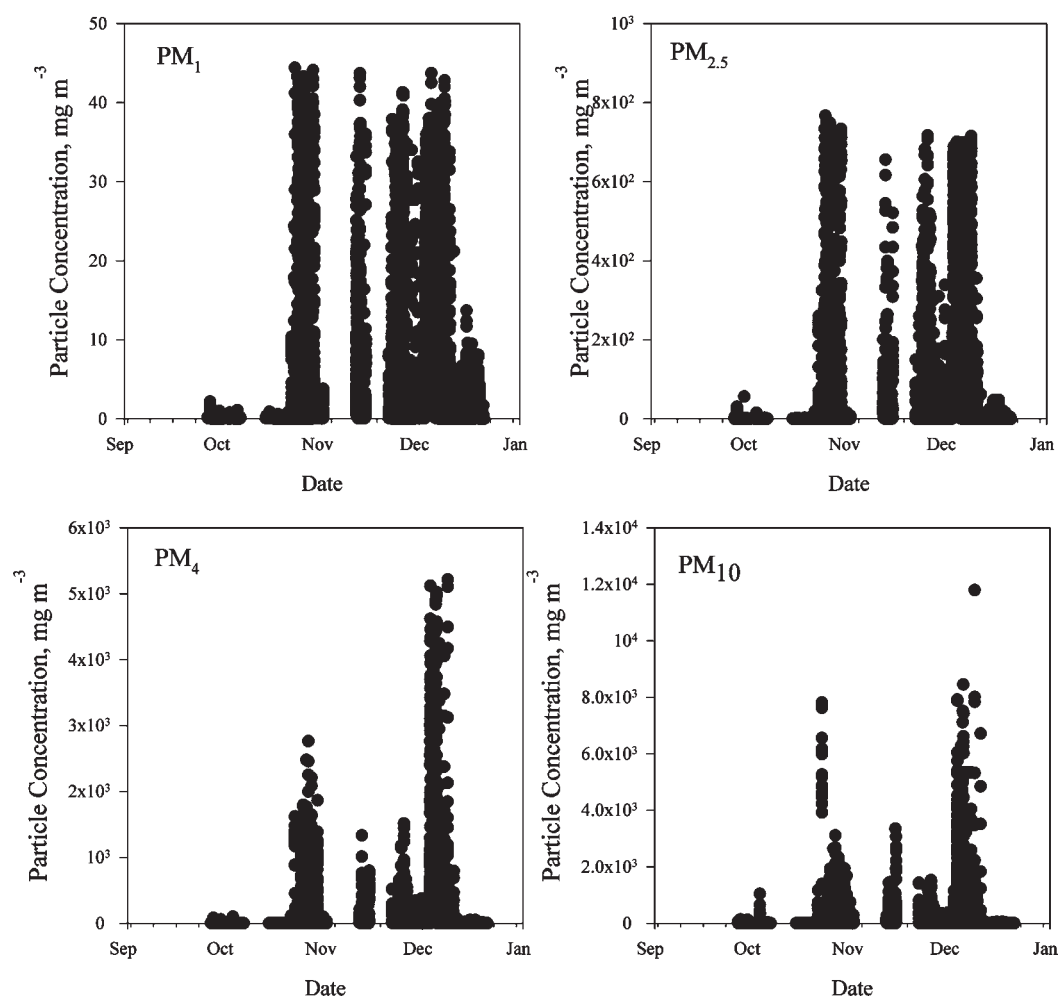


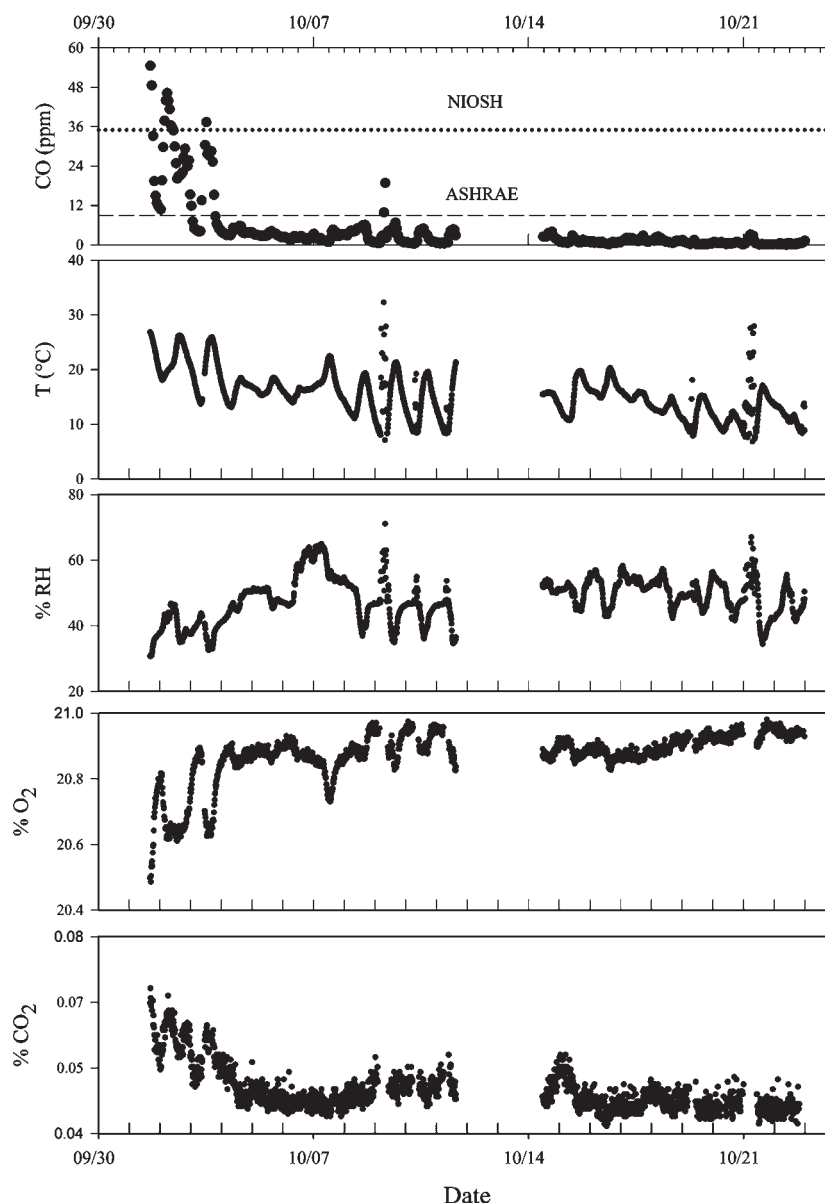
Figure 4. Particle concentration in the air duct exhaust at the storage bin in Malone Middle School.

of explosion. The National Fire Protection Association (NFPA) defines wood dust as a deflagrable (combustible dust) wood particulate with a median diameter of  $420\ \mu\text{m}$  or smaller, having a moisture content of less than 25%. The level of explosion limit for wood dust suspended on air is  $40\ \text{g m}^{-3}$  ( $4000\ \text{mg m}^{-3}$ ). Results of concentration of particles are shown in Figure 4. The sensor started having problems after mid-December, so these results are not presented. The data from November until mid-December clearly shows that the concentration of any of the particle sizes measured do not exceeds the concentration of airborne particles in the safety standards established (Max:  $\text{PM}_{10} \sim 12\ 000\ \mu\text{g m}^{-3}$ ;  $\text{PM}_4 \sim 5000\ \mu\text{g m}^{-3}$ ;  $\text{PM}_{2.5} \sim 750\ \mu\text{g m}^{-3}$ ; and  $\text{PM}_1 \sim 45\ \mu\text{g m}^{-3}$ ).

**Wild Center.** Background sampling started at the beginning of September, but there were unexpected spikes on all sensors that suggested an interference with the signal. The first pellets delivery was on Sept. 29, 2013. Data presented here is ranges Oct. 1–22, 2013; after this period, the system continues with interferences. Figure 5 shows the results of the five sensors for about 20 days in Oct. 2013. CO concentrations reached a maximum 1-h average of around 55 ppm. The 8 h average value reached 35 ppm that is the NIOSH guideline, but it did not exceed the OSHA regulatory standard of 50 ppm. The elevated concentrations only persist until Oct. 4 (around 5 days). These data show a relationship among temperature, CO, and CO<sub>2</sub> that

suggests that with an increase in temperature CO and CO<sub>2</sub> will increase the rate of off-gassing from the pellets. The maximum peaks of temperature match with the minimum peaks of %RH and %O<sub>2</sub>, suggesting that the off-gassing occurs with a depletion of oxygen and lower RH. This result has been observed in a previous field study of larger scale storage bins (silo) were higher temperatures shows higher emission factors of CO and lower concentration of O<sub>2</sub>.<sup>19</sup> The occasionally high temperature in the pellets bin appears to be a leak of heat from the solar-thermal panels on the side of the container. Nevertheless, the O<sub>2</sub> (21%–20.5%) and CO<sub>2</sub> (700–450 ppm) concentrations are quite constant over the rest of the sample period (Oct. 5–22). Thus, the limited decomposition of the pellets and the natural ventilation into this bin resulted in relatively constant atmospheric compositions.

**Walker Center.** This location has the first imported high-efficiency wood pellet boiler in the Northeastern U.S.A. Walker had a pellet delivery (softwood) on Nov. 4, 2013. The measured values are shown in Figure 6. CO concentrations rose to approximately 40 ppm. Concentrations remained above 10 ppm for 7 days (Nov. 4–11), and after Nov. 17, the concentration dropped to background conditions (<2 ppm). During these 7 days, the temperature showed a weak relationship with the CO and CO<sub>2</sub> off-gassing, in contrast with the observations from the Wild Center (Figure 5).



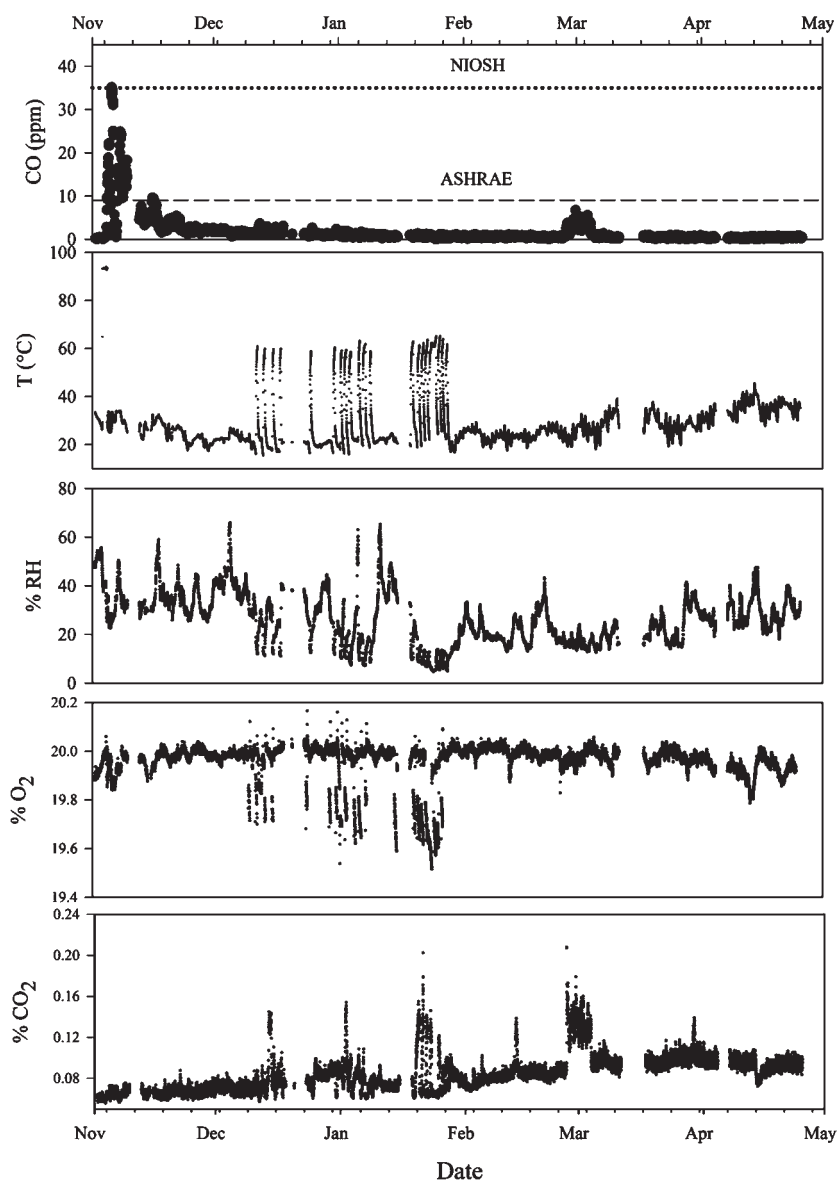
**Figure 5.** Time series for CO, temperature ( $T$ ), relative humidity (%RH), %O<sub>2</sub>, and %CO<sub>2</sub> in the Wild Center Museum in Tupper Lake, NY.

However, the lower values of RH (from 55 to 25%) and %O<sub>2</sub> (from 20.0 to 19.8%) align with the peaks of CO and CO<sub>2</sub> (600–700 ppm). For O<sub>2</sub>, this behavior can be due to the oxidation of the wood pellets. The water vapor variations may be attributed to the infiltration or ventilation in the building, while CO and CO<sub>2</sub> are being produced within the storage bin. The observed results do not suggest that water vapor reduction is attributable to water uptake by the pellets based on a moisture content analysis of the pellets in this storage bin after 4 months that showed a value of 4.5% (manufacturer's specifications for fresh pellets <5%).

During the winter, mid-December to the end of January, all sensors responded with ordinary spikes or off sets, especially the temperature sensor (range: 20–60 °C). This behavior might be the result of a malfunctioning room heater inside the bin that activates at low temperatures to ensure that the pellets do not freeze. In addition, there is an increase in CO (<10 ppm) and CO<sub>2</sub> (0.12%) concentrations at the end of February

until the beginning of March that correspond to the starting of the boiler during this limited period. Because of modifications to the boiler system that were being performed, the boiler was not operated during this heating season at any other time. The results presented in the Walker Center shows that this site is not as well ventilated as the Wild Center resulting in a longer period for the CO to dilute. However, the fresh pellets delivered in November generated sufficient CO to exceed the occupational guideline value. Therefore, this storage bin has been defined as a confined place.

**Energy Cabin.** The Energy Cabin is the smallest bin in this study. The delivery of pellets is performed manually from 40 pounds bags that had been stored and placed outside the cabin generally for more than 2 weeks of storage. Figure 7 shows very low values of CO (<5 ppm) during the entire sampling period except for April when values reached approximately 10 ppm, above the 9 ppm of ASHRAE guideline. This CO off-gassing is followed by an increase in temperature in the bin that coincides



**Figure 6.** Time series for CO, temperature, relative humidity, %O<sub>2</sub>, and %CO<sub>2</sub> in the Walker Center at Clarkson University in Potsdam, NY.

with the minimum RH and O<sub>2</sub> values during this period. In general, there is a weak relation between the CO off-gassing and the temperature, % RH, % O<sub>2</sub>, and CO<sub>2</sub> over the entire period at this site. CO (<10 ppm), O<sub>2</sub> (21%), and CO<sub>2</sub> (450 ppm) concentrations are relatively constant over the entire period probably because the wood pellets had an opportunity to age before they were placed inside the bin.

The results presented here for the six different small-scale pellet storage bins show, in general, that the concentration were not as high as reported by Gauthier<sup>9</sup> and Emhofer<sup>18</sup> with all of the concentrations being below 200 ppm. This behavior might be in part due to the intrinsic ventilation of all the sites under study and the chemical composition and quality of the wood pellets manufacturer here (low ash and moisture content). Prior studies showed that commercial wood pellets produce less CO and PM than other solid fuels.<sup>20</sup> Also, the data show that CO levels increased only during the days immediately following the delivery of fresh pellets. It then decreases slowly to background values. Emhofer<sup>18</sup> concludes that storage rooms

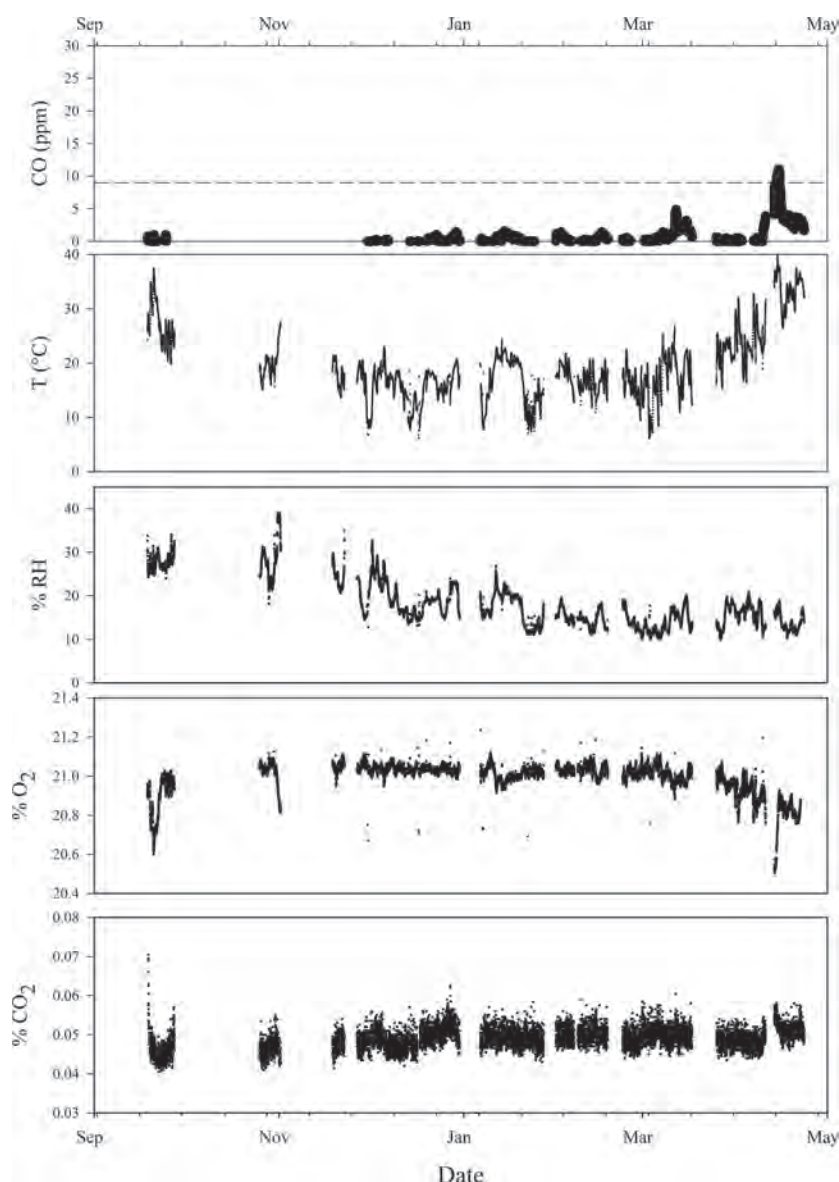
should not be entered within 4 weeks after pellet deliver, but our data suggest a significantly shorter time, more on the order ~1 week, may be acceptable. However, measurements of the CO concentrations should be made before entry.

Natural ventilation has been recommended by Emhofer,<sup>18</sup> such as utilizing caps on the filling tubes that allow air exchange between the storeroom and the surroundings to reduce CO concentrations. However, caution should be taken with respect to cross ventilation and differences in temperatures between the storeroom and surroundings. Also, as shown in our results at Massena residence, by opening windows (natural ventilation) and installing an exhaust fan (mechanical ventilation); the CO and VOCs (odors) were readily reduced.

## CONCLUSIONS

This field study demonstrated that there is off-gassing of sufficient CO from stored pellets to represent a hazard that needs to be adequately addressed. Although no concentrations that would directly produce short-term extreme health effects





**Figure 7.** Time series for CO, temperature, relative humidity, %O<sub>2</sub>, and %CO<sub>2</sub> in the Energy Cabin at Clarkson University in Potsdam, NY.

were observed, concentrations above levels set as exposure guidelines of 35 ppm in occupational settings and 9 ppm in homes were exceeded, especially immediately after pellet delivery. The concern is that as biomass boilers become more widely used, a broad array of homes with varying levels of natural ventilation will install pellet heating systems with inside the structure storage bins. In energy efficient (low air exchange rates) homes, this situation could produce unacceptable CO concentrations. These results raise a safety question regarding how pellets storage bins are designed and sited. Active and natural ventilation clearly reduces the average concentrations, although higher values were still occasionally observed. Pellet aging clearly reduced the amount of observed CO. There was a clear positive relationship with the off-gassing of CO and CO<sub>2</sub> and temperature where higher temperatures produce higher off-gassing production. Thus, bin temperatures need to be considered when designing or choosing a pellet storage bin.

## ■ ASSOCIATED CONTENT

### ⑤ Supporting Information

Additional information regarding the health effect and exposure limits of CO, and a detail description of the experimental setup with respect to the sensor systems and sampling sites. This material is available free of charge via the Internet at <http://pubs.acs.org/>.

## ■ AUTHOR INFORMATION

### Corresponding Author

\*E-mail: [hopkepk@clarkson.edu](mailto:hopkepk@clarkson.edu).

### Notes

The authors declare no competing financial interest.

## ■ ACKNOWLEDGMENTS

We want to acknowledge NYSEDA for their financial support and to all the people who allowed us to make measurements at their home, schools, and museum.

## ■ REFERENCES

- (1) Retka, S. The Path Ahead. *Biomass Magazine*, September 14, 2014. <http://biomassmagazine.com/articles/10907/the-path-ahead>.
- (2) Retka, S. Domestic, Global Outlook. *Biomass Magazine*, September 23, 2013. <http://biomassmagazine.com/articles/9467/domestic-global-outlook>.
- (3) Svedberg, U.; Hogberg, H.; Hogberg, J.; Gale, B. Emission of Hexanal and Carbon Monoxide from Storage of Wood Pellets, a Potential Occupational and Domestic Health Hazard. *Ann. Occup. Hyg.* **2004**, *48*, 339–349.
- (4) Kuang, X.; Shankar, T. J.; Bi, X. T.; Sokhansanj, S.; Jim Lim, C.; Melin, S. Characterization and Kinetics Study of Off-Gas Emissions from Stored Wood Pellets. *Ann. Occup. Hyg.* **2008**, *52* (8), 675–683.
- (5) Kuang, X.; Shankar, T. J.; Bi, X. T.; Jim Lim, C.; Sokhansanj, S.; Melin, S. Rate and Peak Concentrations of Off-Gas Emissions in Stored Wood Pellets—Sensitivities to Temperature, Relative Humidity, and Headspace. *Ann. Occup. Hyg.* **2009**, *53*, 789–796.
- (6) Kuang, X.; Shankar, T. J.; Bi, X. T.; Sokhansanj, S.; Jim Lim, C.; Melin, S. Effects of Headspace and Oxygen Level on Off-Gas Emissions from Wood Pellets in Storage. *Ann. Occup. Hyg.* **2009**, *53*, 807–813.
- (7) Svedberg, U.; Samuelsson, J.; Melin, S. Hazardous Off-Gassing of Carbon Monoxide and Oxygen Depletion during Ocean Transportation of Wood Pellets. *Ann. Occup. Hyg.* **2008**, *52*, 259–266.
- (8) Svedberg, U.; Petrini, C.; Johanson, G. Oxygen Depletion and Formation of Toxic Gases Following Sea Transportation of Logs and Wood Chips. *Ann. Occup. Hyg.* **2009**, *53*, 779–787.
- (9) Gauthier, S.; Grass, H.; Lory, M.; Krämer, T.; Thali, M.; Bartsch, C. Lethal Carbon Monoxide Poisoning in Wood Pellet Storerooms—Two Cases and a Review of the Literature. *Ann. Occup. Hyg.* **2012**, *56*, 755–763.
- (10) World Health Organization (WHO). *Air Quality Guidelines for Europe*, 2nd ed., WHO Regional Publication, European Series, No. 91.; WHO Regional Office for Europe: Copenhagen, Denmark, 2000.
- (11) U.S. EPA. *Integrated Science Assessment for Carbon Monoxide (Final Report)*; EPA/600/R-09/019F; U.S. Environmental Protection Agency: Washington, DC, 2010.
- (12) Varon, J.; Marik, P. E.; Fromm, R. E.; Gueler, A. Carbon Monoxide Poisoning: A Review for Clinicians. *J. Emergency Med.* **1999**, *17*, 87–93.
- (13) Maynard, R. L.; Waller, R. Carbon Monoxide. In *Air Pollution and Health*; Holgate, S. T., Samet, J. M., Koren, H. S., Maynard, R. L., Eds.; Academic Press: Harcourt Brace & Company: San Diego, 1999; pp 749–796.
- (14) *Review of Health Effects Literature for Sub-Acute Carbon Monoxide Exposure and Health Effects*; Natural Gas Codes and Standards Research Consortium: Washington, DC, 2008; <http://fba.aga.susqtech.com/SiteCollectionDocuments/KnowledgeCenter/OpsEng/CodesStandards/0804COSUBACTHE.PDF>.
- (15) Arshadi, M.; Geladi, P.; Gref, R.; Fjallstrom, P. Emission of Volatile Aldehydes and Ketones from Wood Pellets under Controlled Conditions. *Ann. Occup. Hyg.* **2009**, *53*, 797–805.
- (16) Lehtikangas, P. Storage Effects on Pelletized Sawdust, Logging Residues, and Bark. *Biomass Bioenergy* **2000**, *19*, 287–293.
- (17) Fan, C.; Bi, X. T. Development of Off-Gas Emission Kinetics for Stored Wood Pellets. *Ann. Occup. Hyg.* **2013**, *57*, 115–124.
- (18) Emhofer, W.; Lichtenegger, K.; Haslinger, W.; Hofbauer, H.; Schmutzer-Roseneder, I.; Aigenbauer, S.; Lienhard, M. Ventilation of Carbon Monoxide from the Biomass Pellet Storage Tank—A Study of the Effects of Variation of Temperature and Cross-ventilation on the Efficiency of Natural Ventilation. *Ann. Occup. Hyg.* **2014**, *1*–12. DOI: 10.1093/annhyg/meu076.
- (19) Yazdanpanah, F.; Sokhansanj, S.; Lim, C. J.; Lau, A.; Bi, X.; Melin, S. Stratification of off-gases in stored wood pellets. *Biomass Bioenergy* **2014**, DOI: 10.1016/j.biombioe.2014.04.019.
- (20) Sippula, O.; Hytonen, K.; Tissari, J.; Raunemaa, T.; Jokiniemi, J. Effect of Wood Fuel on the Emissions from a Top-Feed Pellet Stove. *Energy Fuels* **2007**, *21*, 1151–1160.



## Wood Pellet Manufacturing Facilities

Under the *Environmental Management Act* (EMA), all high-risk, and some medium-risk, industrial operations in British Columbia are required to have government authorization<sup>1</sup> prior to discharging emissions or waste to the environment. These authorizations are legally enforceable and are subject to pollution preventing conditions and criteria. Authorizations for new, or significantly modified, wood pellet manufacturing facilities are developed based on the Ministry's Guideline for Emissions from Wood Pellet Manufacturing Facilities.

The purpose of this document is to summarize key emissions information contained in the Ministry's Guideline for Emissions from Wood Pellet Manufacturing Facilities.

### What are guidelines used for?

Guidelines provide assistance to directors, appointed under EMA, when preparing and issuing authorizations for industrial facilities.

### What are wood pellets?

Wood pellets are a type of wood fuel, usually produced as a by-product of sawmilling and other wood transformation activities. The pellets are generally made from compacted sawdust and shavings. The sawdust and shavings may be blended with smaller amounts of processed bark, hog fuel, processed standing dead timber and processed landing debris.

Wood pellets are usually 6 to 8mm in diameter and 2cm in length. However, they can be manufactured in other configurations, such as pucks or logs.

<sup>1</sup> Authorizations may include permits, approvals, operational certificates or regulations. For more information on waste discharge authorizations, see:  
[http://www.env.gov.bc.ca/epd/waste\\_discharge\\_auth/index.htm](http://www.env.gov.bc.ca/epd/waste_discharge_auth/index.htm)

### How are wood pellets produced?

Wood pellets are normally produced by compressing dry wood materials to a desired size. First, raw wood materials are passed through a hammer mill and dryer to achieve consistent moisture content. Then, the dry wood particles are fed to a press. In the press they are squeezed through a die having holes of the required size.

The high pressure causes the temperature of the wood to increase greatly, causing the lignin to plasticize slightly and form a natural 'glue' that holds the pellet together.

### How are air emissions produced during the wood pellet manufacturing process?

Air emissions may be produced during the wood pellet manufacturing process from sources such as dryers, coolers, pelletizers, hammermills, and conveyors. Fugitive emissions are also released during the handling, storage and transportation of the materials.

### What are the emission limits?

The Guideline for Emissions from Wood Pellet Manufacturing Facilities outlines emission limits for total particulate matter (TPM) and fugitive emissions.

The guideline is based on best achievable technology and describes requirements for both new and significantly modified existing facilities.

### New Facilities

The guideline stipulates that all new facilities should install control technologies that will at minimum, achieve the emission limits listed in Tables 1 and 2.



## Existing Facilities

The guideline specifies that existing facilities that have undergone significant modifications are expected to meet the applicable monitoring and control requirements listed in Tables 1 and 2. Existing wood pellet manufacturing facilities that have not been significantly modified may continue to operate in accordance with the limits of their current permit.

### When has a facility been “significantly modified”?

A facility has been significantly modified if it has undergone a physical or operational change resulting in an increase of 10% or more in the volume of discharge or the total amount of any contaminant released to the environment, based on authorized values.

### What is Total Particulate Matter (TPM)?

Particulate matter refers to tiny solid or liquid particles that float in the air. TPM consists of filterable and condensable particulate matter. Filterable particulate matter includes all PM<sub>10</sub> and PM<sub>2.5</sub> emissions, where PM<sub>10</sub> and PM<sub>2.5</sub> are comprised of particulate matter with aerodynamic diameters less than 10 and 2.5 micrometers respectively. Condensable particulate matter is any material that is not particulate matter at stack conditions, but condenses and/or reacts to form particulate matter immediately after discharge from the stack.

### Why are TPM emissions limited?

TPM emissions are limited because they can have negative impacts on local air quality and human health. PM<sub>2.5</sub> is known to cause aggravation of respiratory and cardiovascular disease, reduced lung function, increased respiratory symptoms and premature death. TPM also impairs visibility, affects climate and can damage and/or discolour structures and property.<sup>2</sup>

---

<sup>2</sup> More information on how air quality affects human health can be found in the State of the Air Report 2010 at: <http://www.bc.lung.ca/airquality/documents/StateOfTheAir2010webrevised.pdf>

*Note: This summary is solely for the convenience of the reader. The current guideline should be consulted for complete information.*

## TPM emission limits

The TPM emission limits and monitoring frequency for wood pellet manufacturing facilities outlined in the Ministry’s guideline are summarized in Table 1.

In addition to emission limits listed below, facilities should strive to maintain opacity below 10%. Opacity can be thought of as the amount of light blocked by TPM.

### How frequently should TPM emissions be monitored?

The monitoring frequency listed in Table 1 should be followed except in the case of the implementation of new process units. For new units, an operator should undertake baseline monitoring (stack testing) within six months of start up. Thereafter, the operator should continue monitoring at the prescribed monitoring frequency stated in Table 1.

### What are fugitive emissions?

Fugitive emissions are unintentional or incidental releases. The significance of fugitive emissions at wood pellet manufacturing facilities may vary depending on the type of raw material, method of transportation and specific process used in the production of the wood pellets. Major sources of these emissions include raw material handling, raw material storage piles, conveyor transfer points, yard dust, haul road dust and engine exhaust.

### Fugitive emission limits

Table 2 provides a summary of the limits and monitoring and control strategies detailed in the guideline to mitigate fugitive emissions.

### What are the effluent handling requirements?

If the applied emission control technology uses a solution, such as water, any resulting effluent should be delivered to an approved facility for treatment or disposed of in a manner approved by a director.

## Are there other considerations?

The information contained in the Ministry's guideline documents are just one of the main pieces of information taken into consideration by the director when approving an authorization. Additional sources of information considered by the director may include environmental impact assessments, local air shed plans, other guidelines and stakeholder input. The director also has the authority to impose emission standards other than those that are recommended in these types of guidelines.

For more information, contact the Environmental Standards Branch at [envprotdiv@victoria1.gov.bc.ca](mailto:envprotdiv@victoria1.gov.bc.ca)

Or, consult our website at [http://www.env.gov.bc.ca/epd/industrial/pulp\\_paper/umber/pdf/moe-pellet-industry-051410.pdf](http://www.env.gov.bc.ca/epd/industrial/pulp_paper/umber/pdf/moe-pellet-industry-051410.pdf).

**Table 1: Total Particulate Matter Emissions Limits for Wood Pellet Manufacturing Facilities.**

| Source                               | Limit <sup>(a)</sup><br>(mg/m <sup>3</sup> ) | Monitoring <sup>(b)</sup> |
|--------------------------------------|----------------------------------------------|---------------------------|
| Dryer Exhaust                        | 60 <sup>(c)</sup>                            | Quarterly                 |
| Pellet Cooler Exhaust                | 115 <sup>(e)</sup>                           | Annual                    |
| Other Plant Processes <sup>(d)</sup> | 20 <sup>(e)</sup>                            | Annual                    |

(a) Concentration limits measured at standard conditions of 20°C, 101.3kPa, dry gas.

(b) All monitoring for this guideline must be carried out in accordance with the latest version of the: *British Columbia Field Sampling Manual – For Continuous Monitoring and the Collection of Air, Air-Emission, Water, Wastewater, Soil, Sediment and Biological Samples.*

(c) The dryer exhaust limit includes filterable and condensable particulate matter. It is an interim two year limit. This limit may be adjusted as more data becomes available.

(d) Other plant processes may include pelletizers, hammermills, storage, screening and conveyors.

(e) Includes filterable particulate matter only.

**Table 2. Fugitive Emissions from Raw Material Storage Piles and Road Dust**

| Source                           | Limit                          | Monitoring and Control                                                                                                                                                                                              |
|----------------------------------|--------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sawdust and Wet Material         | No Visible downwind carry over | Visual monitoring with controls as required including: limiting pile heights and limiting exposed pile faces to high winds (e.g. wind breaks; vegetative or screens). Include meteorological controls and planning. |
| Planer Shavings and Dry Material |                                | As above, plus three sided and covered containment. Prevent vehicle traffic from grinding material finer.                                                                                                           |
| Onsite Haul Roads                |                                | Dust suppression in dry season or paving.                                                                                                                                                                           |

We use cookies to enhance your experience on our website. By clicking 'continue' or by continuing to use our website, you are agreeing to our use of cookies. You can change your cookie settings at any time.

[Continue](#)[Find out more](#)

## Carbon Monoxide Off-Gassing From Bags of Wood Pellets

Mohammad Arifur Rahman, Alan Rossner, Philip K Hopke 

*Annals of Work Exposures and Health*, Volume 62, Issue 2, March 2018, Pages 248–252, <https://doi.org/10.1093/annweh/wxx104>

**Published:** 25 December 2017 **Article history** ▼

 PDF  Split View  Cite  Permissions  Share ▼

### Abstract

Wood pellets are increasingly used for space heating in the United States and globally. Prior work has shown that stored bulk wood pellets produce sufficient carbon monoxide (CO) to represent a health concern and exceed regulatory standards for occupational exposures. However, most of the pellets used for residential heating are sold in 40-pound (18.1 kg) plastic bags. This study measured CO emission factors from fresh, bagged-wood pellets as a function of temperature and relative humidity. CO concentrations increased with increasing temperature and moisture in the container. CO measurements in a pellet mill warehouse with stored pallets of bagged pellets had 8-h average CO concentrations up to 100 ppm exceeding occupational standards for worker exposure. Thus, manufacturers, distributors, and home owners should be aware of the potential for CO in storage areas and design facilities with appropriate ventilation and CO sensors.

**Keywords:** bagged-wood pellets, CO off-gassing, emission factors, exposure

**Issue Section:** Short Communication

## Introduction

The worldwide wood pellet market has grown rapidly. Growth rates have been about 10% annually from ~19.5 million metric tons in 2012 to ~28 million metric tons in 2015 (WPAC, 2017). In 2016, the demand for industrial wood pellets was estimated to be ~13.8 million metric tons (WPAC, 2017). However, a problem exists with respect to the safe handling of wood pellets and that is off-gassing of carbon monoxide (CO) and aldehydes into storage bins and shipping vessels (Svedberg *et al.*, 2004, 2008, 2009; Arshadi and Gref, 2005; Hagström *et al.*, 2008; Kuang *et al.*, 2008; Arshadi *et al.*, 2009; Granström, 2010; Soto-García *et al.*, 2015a). Fourteen fatal accidents have been reported since 2002 resulting from the storage or transport of bulk wood pellets (Gauthier *et al.*, 2012).

Soto-García *et al.* (2015a) measured 8-h average CO concentrations up to 35 ppm in a residential basement. Recently, Rossner *et al.* (2017) measured CO concentrations in areas with indoor storage of bulk wood pellets in homes and reported that 6 of the 16 homes tested exceeded the 9-ppm American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE, 2009) guidance concentration on multiple occasions. These studies were performed using bulk wood pellets, but most wood pellets in the United States are sold and distributed in plastic bags containing 10 to 25 kg (Safe Pellets, 2012). To store and transport the bagged pellets, they are normally stacked on pallets with typically a ton per pallet. The bags are perforated to allow for stacking on the pallets without the air in the bags inflating them and thereby preventing effective packing.

After purchasing bagged-wood pellets, consumers often store 1–3 tons of pellets in an inside storage room or in the basement until they are needed. Pellet manufacturers and distributors generate or store large quantities of bagged pellets in warehouses for extended periods before selling them to the customers. The perforations of the plastic bags suggest that the CO generated from these pellets can emanate from the bags, enter the storage area, and result in exposures to building occupants. There is currently no published information regarding the off-gassing of CO from the stored bagged-wood pellets and the resulting impacts on air quality in occupational or residential spaces.

Soto-García *et al.* (2015b) measured the emission factors for CO off-gassing from loose hardwood, softwood, and blended pellets by storing pellets in steel drums and measuring the resulting CO under varying temperature and moisture conditions. Similar results have been obtained in other studies (Kuang *et al.*, 2008; Emhofer *et al.*, 2014). The objective of this present study was to understand the impact of storing bagged pellets by manufacturers, distributors, and consumers by estimating the emission factors for CO off-gassing. CO emissions from bagged pellets were studied as a function of temperature, and relative humidity (RH) that could mimic storage conditions in a warehouse, basement, or garage. Wood type (hardwood, softwood, and blended) affects CO emissions (Soto-García *et al.*, 2015b) and off-gassing from hardwood, softwood, and hardwood/softwood blended bagged pellets was measured. To ascertain if these emissions represented an occupational hazard, measurements were made in the warehouse of an active pellet mill.

[Skip to Main Content](#)

## Methods

The experiments were conducted in a manner similar to that described by [Soto-Garcia et al. \(2015b\)](#) except using 55-gallon (208.2 l) carbon steel drums. The 55-gallon drums were sealed by a metal ring to maintain an airtight fit against a gasket. Two sealed bags of pellets were inserted into each drum for each experiment. A CO monitor (Model ZDL-500, Environmental Sensors Co., USA) and a temperature (T)/RH (EL-USB-2+, EasyLog, LASCAR electronics, China) monitor were attached to the inside bottom of the cover ([Fig. 1](#)). The drum was sealed for 20 days to continuously monitor the resulting CO concentrations as well as temperature and RH. The CO monitors measured from ~1 to 2000 ppm and they were calibrated using high purity CO gas (99.999%) diluted with zero air in a Model 146i multigas calibrator and a Model 111 zero air supply (ThermoScientific). Fresh (<2 days after production) bags of pellets (40 lbs, 18.14 kg) were obtained from a local manufacturer. The pellets were typically ~6 mm in diameter and 6–25 mm in length, with a bulk density of (40 lbs ft<sup>-3</sup>, ~650 kg m<sup>-3</sup>). Tests were run under different environmental conditions for each type of wood pellets. Three replicate tests of each type of wood pellet were performed. Measurements of CO were data logged every 3 min, and T and RH was measured every 5 min. Each set of measurements was performed for up to 20 days.

Figure 1.



[Open in new tab](#)   [Download slide](#)

Experimental setup of the bag-pellets drum experiment.

Details of these experiments are provided in the Supplemental Information file (available at *Annals of Work Exposures and Health* online). CO emission factors were then calculated from the data. At constant temperature (T) and pressure (P), the concentration of CO off-gassing was converted to an emission factor, *f* (milligram of off-gas per kilogram of wood pellets) using the equation of [Yazdanpanah et al. \(2014\)](#) and [Tumuluru et al. \(2015\)](#).

$$f = \frac{PCVgMwt}{RTM} * 1000 \tag{1}$$

Where, *T* = temperature (K); *R* = gas constant (8.31 J mol<sup>-1</sup>.K<sup>-1</sup>); *M<sub>w</sub>* = gas molecular weight (g mole<sup>-1</sup>); *M* = mass of the pellets in the drum (kg); *V<sub>g</sub>* = volume of the gas in the drum (m<sup>3</sup>); *P* = pressure in the container.

Field study

To monitor CO in a large-scale pellet storage, a CO logger was place in a large pellet warehouse ([Rahman et al., 2017](#)). The warehouse can store 269000 bags (40-lbs bags), equivalent to ~5000 tons of pellets. The warehouse represents a volume of ~480000 ft<sup>3</sup> (13592 m<sup>3</sup>). Measurements were made from 25 April to 21 July 2016 and 21 July to 26 October 2016. The break in measurements was to download the data and clear the memory. During these periods, the warehouse was being filled with ~5000 and 2500 tons of pellets, respectively, in anticipation of the 2016–2017 heating season. CO was measured at 5-min intervals in the middle of the storage area at 3.66 m (12 ft) and 1.52 m (5 ft) above the floor level with Lascar CO monitors. When pellets were being loaded into the warehouse or removed for shipment, one of the large doors was open. The warehouse configuration and sampling position are illustrated schematically in [Supplementary Fig. S3](#) (available at *Annals of Work Exposures and Health* online).

Results and discussions

Laboratory study results

A detailed discussion of the laboratory results are provided in the Supplemental Information file (available at *Annals of Work Exposures and Health* online). The maximum CO emission factors are presented in [Table 1](#). The results show that CO emissions increase with temperature at 30% RH for all types of bagged pellets. However, the emission rates are higher for blended wood (70% softwood, 30% hardwood) and softwood compared to hardwood (100%) pellets at all temperatures. Temperature has a significant effect on CO production for all wood pellet types as seen in prior studies ([Soto-Garcia et al., 2015b](#)).

Table 1.  
Summary of the maximum CO emission factors at different temperature and moisture.

| Sk | Temperature (°C) |  | Hardwood                                    |        | Softwood                                    |        | Blended wood                                |        |
|----|------------------|--|---------------------------------------------|--------|---------------------------------------------|--------|---------------------------------------------|--------|
|    |                  |  | Max. emission factor (mg kg <sup>-1</sup> ) |        | Max. emission factor (mg kg <sup>-1</sup> ) |        | Max. emission factor (mg kg <sup>-1</sup> ) |        |
|    |                  |  | 30% RH                                      | 70% RH | 30% RH                                      | 70% RH | 30% RH                                      | 70% RH |

Article Navigation

|     | Max. emission factor (mg kg <sup>-1</sup> ) |             | Max. emission factor (mg kg <sup>-1</sup> ) |             | Max. emission factor (mg kg <sup>-1</sup> ) |              |
|-----|---------------------------------------------|-------------|---------------------------------------------|-------------|---------------------------------------------|--------------|
|     | 30% RH                                      | 70% RH      | 30% RH                                      | 70% RH      | 30% RH                                      | 70% RH       |
| 0–6 | 0.35 ± 0.06                                 | 1.17 ± 0.08 | 0.42 ± 0.10                                 | 1.88 ± 0.06 | 0.99 ± 0.11                                 | 2.52 ± 0.15  |
| 22  | 3.18 ± 0.12                                 | 3.27 ± 0.11 | 5.73 ± 0.21                                 | 7.74 ± 0.41 | 7.66 ± 0.45                                 | 9.52 ± 0.55  |
| 30  | 4.47 ± 0.22                                 | 6.10 ± 0.14 | 9.66 ± 0.52                                 | 10.4 ± 0.6  | 9.95 ± 0.53                                 | 10.41 ± 0.49 |

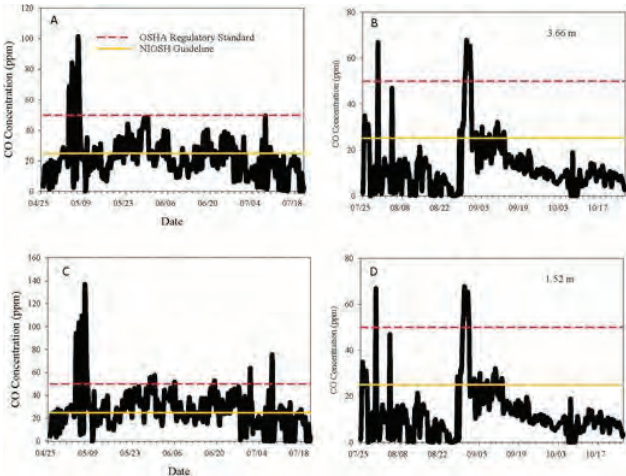
Open in new tab

In the United States, the Occupational Safety and Health Administration (OSHA, 1997) permissible exposure limits is 50 parts per million (ppm) averaged over an 8-h time period. Other guidance values like that of the ACGIH are lower (25 ppm over an 8-h period).The CO concentrations for all pellet types at room temperature (22°C) and elevated temperature (30°C) at both RH values were high enough to produce potential in-building concentrations that exceed the ACGIH health-based guidelines of 25 ppm (ACGIH, 2007) and OSHA-regulatory concentration of 50 ppm for occupational settings. In addition, the 9 ppm (ASHRAE, 2009) guideline for homes could be exceeded.

Measured CO concentrations in the warehouse

Fig. 2 presents the 8-h rolling average CO concentrations calculated from the 5-min data. Fig. 2A and B show the CO measured at 3.66 m above the floor while Fig. 2C and D show the measurements at 1.52 m. Temperature and RH were measured in the warehouse. The temperature during the April to June period ranged from 5 to 20°C and the opposite trend of 20 to 5°C during the July to October period. RH was ~30%, similar to what was observed in the drums without added water. These measurements confirmed that concentrations can reach concentrations of regulatory concern. The peaks occurred after a substantial mass of fresh pellets was brought into the warehouse. Workers would bring in a truck load, off-load it, and stack the pallets and leave so the space was not routinely occupied for a continuous 8 h. In April, the warehouse was about 30% full and in May, it was 50% full. In June, the warehouse was at capacity. The maximum 8-h value was 109 ppm exceeding both OSHA regulations and the ACGIH guidance value. Shipments reduced the inventory and additional fresh pellets then were added several times resulting in the peaks observed during the July to October period. There were no short-term spikes to extreme concentrations since the maximum 15-min CO concentrations at 1.52 m were 155 and 113 ppm, respectively, for the two sampling periods.

Figure 2.



Open in new tab      Download slide

Time series of rolling 8-h average concentrations of carbon monoxide measured in the storage warehouse of the pellet mill. (A) and (B) show the CO measured at 3.66 m above the floor, while (C) and (D) show the measurements at 1.52 m during the two measurement periods.

Conclusions

The results of this study demonstrated that CO emissions from wood pellets stored in plastic bags within a building are a concern with respect to undesirable exposures of the building’s occupants analogous to the problems associated with stored bulk pellets. Environmental factors such as temperature and RH influence the CO emissions. Storage temperature affects CO off-gassing more than the moisture. Faster emissions and higher concentrations were observed with increasing temperature. Pellets stored at high RH showed increased emission rates and higher CO concentrations for all types of pellets than lower RH. Therefore, bagged pellets are best stored in cool and dry places. All types of bagged pellets could produce concentrations exceeding exposure health base limits and prior work in Europe had suggested there are limitations to the effectiveness of passive ventilation (Emhofer et al., 2014), it is essential to design pellet storage spaces with active ventilation and CO monitors for both domestic and commercial buildings storing large quantities of wood pellets.

Funding

## Declaration

The authors declare no conflict of interest relating to the material presented in this Article. Its contents, including any opinions and/or conclusions expressed, are solely those of the authors.

## Acknowledgements

The authors thank Curran Renewable Energy LLC for the donation of the pellets used in this study.

## References

- ACGIH. (2007) *TLVs and BEIs. Threshold limit values for chemical substances and physical agents*. Cincinnati, OH: Biological exposure limits. Available at <https://www.acgih.org/forms/store/ProductFormPublic/documentation-of-the-threshold-limit-values-and-biological-exposure-indices-7th-ed>. Accessed 12 December 2017.
- American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE), (2009) Indoor Air Quality Guide. Available at [www.ashrae.org](http://www.ashrae.org). Accessed 14 August 2017.
- Arshadi M., Gref, R. (2005) Emission of volatile organic compounds from softwood pellets during storage. *Forest Prod. J* ; 55: 132–35.
- Arshadi M, Geladi P, Gref Ret al. (2009) Emission of volatile aldehydes and ketones from wood pellets under controlled conditions. *Ann Occup Hyg* ; 53: 797–05.  
[Google Scholar](#) [PubMed](#)
- Emhofer W, Lichtenegger K, Haslinger Wet al. (2014) Ventilation of carbon monoxide from a biomass pellet storage tank—a study of the effects of variation of temperature and cross-ventilation on the efficiency of natural ventilation. *Ann Occup Hyg* ; 59: 79–90.  
[Google Scholar](#) [PubMed](#)
- Gauthier S, Grass H, Lory Met al. (2012) Lethal carbon monoxide poisoning in wood pellet storerooms—two cases and a review of the literature. *Ann Occup Hyg* ; 56: 755–63.  
[Google Scholar](#) [PubMed](#)
- Granström, K.M. (2010) Emissions of monoterpenes and VOC during drying of sawdust in a continuous spouted bed. *Forest Prod. J* ; 60: 27–32.  
[Google Scholar](#) [Crossref](#)
- Hagström K, Axelsson S, Arvidsson Het al. (2008) Exposure to wood dust, resin acids, and volatile organic compounds during production of wood pellets. *J Occup Environ Hyg* ; 5: 296–04.  
[Google Scholar](#) [Crossref](#) [PubMed](#)
- Kuang X, Shankar TJ, Bi Jet al. (2008) Rate and peak concentrations off-gas emissions in stored wood pellets—sensitivities to temperature, relative humidity, and headspace volume. *Ann Occup Hyg* ; 52: 675–83.  
[Google Scholar](#) [PubMed](#)
- Occupational Health and Safety Administration (OSHA) (1997) U.S. Department of Labor, Carbon monoxide, 48 FR 30909, July 5, 1983, as amended at 49 FR 28551, July 13, 1984; 61 FR 5507, Feb. 13, 1996; 62 FR 40141, July 25, 1997; available from [https://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=STANDARDS&p\\_id=10366](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10366). Accessed 30 July 2017.
- Rahman MA, Rossner A, Hopke PK. (2017) Occupational exposure of aldehydes resulting from the storage of wood pellets. *J Occup Environ Hyg* ; 14: 417–26.  
[Google Scholar](#) [Crossref](#) [PubMed](#)
- Rossner A, Jordan CE, Wake Cet al. (2017) Monitoring of CO in residences with bulk wood pellet storage in the Northeast. *J Air Waste Manage Assoc* .  
Doi:10.1080/10962247.2017.1321054.

[Skip to Main Content](#)

Safe Pellets. (2010) Pellets transport and Storage. Available at <http://www.safe pellets.eu/pellets-transport-storage/pellet-transport/>. Accessed 01 August 2017.

## Article Navigation

Soto-Garcia L, Huang X, Thimmaiah Det al. (2015b) Measurement and modelling of carbon monoxide emission rates from multiple wood pellet types. *Energy Fuels* ; 29: 3715–24.

[Google Scholar](#) [Crossref](#)

Svedberg UR, Högberg HE, Högberg Jet al. (2004)Emission of hexanal and carbon monoxide from storage of wood pellets, a potential occupational and domestic health hazard. *Ann Occup Hyg* ; 48: 339–49.

[Google Scholar](#) [PubMed](#)

Svedberg U, Samuelsson J, Melin S. (2008)Hazardous off-gassing of carbon monoxide and oxygen depletion during ocean transportation of wood pellets. *Ann Occup Hyg* ; 52: 259–66.

[Google Scholar](#) [PubMed](#)

Svedberg U, Petrini C, Johanson G. (2009)Oxygen depletion and formation of toxic gases following sea transportation of logs and wood chips. *Ann Occup Hyg* ; 53: 779–87.

[Google Scholar](#) [PubMed](#)

Tumuluru JS, Lim CJ, Bi XTet al. (2015)Analysis on storage off-gas emissions from woody, herbaceous, and Torrefied biomass. *Energies* ; 8: 1745–59.

[Google Scholar](#) [Crossref](#)

Wood Pellet Association of Canada (WPAC). (2017)Global pellet market outlook in 2017. Available at <https://www.pellet.org/wpac-news/global-pellet-market-outlook-in-2017>. Accessed 14 August 2017.

Yazdanpanah F, Sokhansanj S, Lim CJet al. (2014)Stratification of off gases in stored wood pellets. *Biomass Bioenergy* ; 71: 1–11.

[Google Scholar](#) [Crossref](#)

© The Author(s) 2017. Published by Oxford University Press on behalf of the British Occupational Hygiene Society.

This is an Open Access article distributed under the terms of the Creative Commons Attribution-NonCommercial-NoDerivs licence (<http://creativecommons.org/licenses/by-nc-nd/4.0/>), which permits non-commercial reproduction and distribution of the work, in any medium, provided the original work is not altered or transformed in any way, and that the work is properly cited. For commercial re-use, please contact [journals.permissions@oup.com](mailto:journals.permissions@oup.com)

## Supplementary data

[wxx104\\_suppl\\_Supplemental\\_Information](#) - pdf file



[View Metrics](#)

### Email alerts

[New issue alert](#)

[Advance article alerts](#)

[Article activity alert](#)

[Receive exclusive offers and updates  
from Oxford Academic](#)

### Related articles in

[Google Scholar](#)

[Skip to Main Content](#)

### Citing articles via

[Google Scholar](#)

Article Navigation

- Latest | Most Read | Most Cited
- Malignant Mesothelioma Among Employees of a Connecticut Factory That Manufactured Friction Materials Using Chrysotile Asbestos: An Update

Managing Occupational Exposure to Welding Fume: New Evidence Suggests a More Precautionary Approach is Needed

Bayesian Hierarchical Modelling of Individual Expert Assessments in the Development of a General-Population Job-Exposure Matrix

Evaluation of Pesticides Found in Oregon Cannabis from 2016 to 2017

Differential Exposure to Job Stressors: A Comparative Analysis Between Migrant and Australia-Born Workers

- About Annals of Work Exposures and Health

Editorial Board

Author Guidelines

Contact Us

BOHS News

Advertising and Corporate Services

Journals Career Network
- Facebook

Twitter

LinkedIn

Purchase

Recommend to your Library

Online ISSN 2398-7316

Print ISSN 2398-7308

Copyright © 2019 British Occupational Hygiene Society

About Us

Contact Us

Careers

Help

Access & Purchase

Rights & Permissions

Open Access

Connect

Join Our Mailing List

OUPblog

Twitter

Facebook

YouTube

Tumblr

Resources

Authors

Librarians

Societies

Sponsors & Advertisers

Press & Media

Agents

Explore

Shop OUP Academic

Oxford Dictionaries

Oxford Index

Epigeum

OUP Worldwide

University of Oxford

Oxford University Press is a department of the University of Oxford. It furthers the University's objective of excellence in research, scholarship, and education by publishing worldwide

OXFORD

UNIVERSITY PRESS

Copyright © 2019 Oxford University Press

Cookie Policy

Privacy Policy

Legal Notice

Site Map

Accessibility

Get Adobe Reader

https://academic.oup.com/annweh/article/62/2/248/4774568

6/6





 OPEN MENU

## Fugitive Dust

*NHDES limits activities that result in the creation of fugitive dust.*




impacts to [health and the environment](#) .

Fugitive dust is an air pollutant generated during commercial or business activities such as sand, gravel and rock crushing, road construction, parking lot and roadway cleaning, building construction and demolition, and earthmoving operations. It is also generated during loading and unloading of materials, wind-blown from material stockpiles and exposed soils, and from vehicular traffic. Fine dust inhaled deep into the lungs has been linked to a variety of health problems, ranging from nose and throat irritation to respiratory illnesses, such as bronchitis, lung-damage and asthma. Dust can migrate into nearby surface water. Fugitive dust that settles on nearby vegetation can weaken or kill the vegetation. Dust restricts visibility at the job site and off-site and contributes to regional haze. Regional haze consists of fine dust particles, smoke, and moisture suspended in the air that impairs visibility. Learn about other



NHDES regulates fugitive dust created by commercial or business activities pursuant to [Env-A 1002](#). NHDES limits activities that result in the creation of fugitive dust by requiring that fugitive dust be controlled on-site and not allow to migrate beyond the property boundary. Some exceptions to the rule are driving on dirt or gravel roads; application of sand or de-icing chemicals for pedestrian and vehicular safety; and agricultural or forestry industry operations.

Env-A 1002.03 requires that “any person engaged in any activity that emits fugitive dust . . . shall take precautions throughout the duration of the activity in order to prevent, abate, and control the emission of fugitive dust.” One way to do that is to develop a fugitive dust control plan and follow best management practices. Further guidance on methods for [prevention, abatement and control](#)  of fugitive dust.

### Related Content

[Stack Testing and Monitoring](#)

[Enforcement](#)

[Air Quality](#)

[Criteria Pollutants](#)

[Land Development](#)

[Air Permit Guidance](#)



AIR-COMPLIANCE

**[MICHAEL CAMACHO](#)**

*Senior Compliance Assessment Specialist*

Article

## Analysis on Storage Off-Gas Emissions from Woody, Herbaceous, and Torrefied Biomass

Jaya Shankar Tumuluru <sup>1,\*</sup>, C. Jim Lim <sup>2</sup>, Xiaotao T. Bi <sup>2</sup>, Xingya Kuang <sup>3</sup>, Staffan Melin <sup>4</sup>, Fahimeh Yazdanpanah <sup>2</sup> and Shahab Sokhansanj <sup>2,5</sup>

<sup>1</sup> Biofuels and Renewable Energy Technologies Department,  
Energy Systems & Technologies Division, Idaho National Laboratory,  
P.O. Box 1625, Idaho Falls, ID 83415-2025, USA

<sup>2</sup> Department of Chemical and Biological Engineering, University of British Columbia,  
2360 East Mall, Vancouver, BC V6T 1Z3, Canada; E-Mails: cjlim@chbe.ubc.ca (C.J.L.);  
xbi@chbe.ubc.ca (X.T.B.); fyazdanpanah@chbe.ubc.ca (F.Y.); shahabs@chbe.ubc.ca (S.S.)

<sup>3</sup> Department of Occupational Medicine, Yangpu, District Central Hospital, Shanghai 200090, China;  
E-Mail: xykuang@yahoo.com

<sup>4</sup> Delta Research Corporation, 501 Centennial Parkway, Delta, BC V4L 2L5, Canada;  
E-Mail: drc@dccnet.com

<sup>5</sup> Environmental Sciences Division, Oak Ridge National Laboratory, Oak Ridge, TN 37831, USA;  
E-Mail: sokhansanjs@ornl.gov

\* Author to whom correspondence should be addressed; E-Mail: JayaShankar.Tumuluru@inl.gov;  
Tel.: +1-208-526-0529; Fax: +1-208-526-2639.

Academic Editor: Thomas E. Amidon

Received: 26 November 2014 / Accepted: 12 February 2015 / Published: 2 March 2015

---

**Abstract:** Wood chips, torrefied wood chips, ground switchgrass, and wood pellets were tested for off-gas emissions during storage. Storage canisters with gas-collection ports were used to conduct experiments at room temperature of 20 °C and in a laboratory oven set at 40 °C. Commercially-produced wood pellets yielded the highest carbon monoxide (CO) emissions at both 20 and 40 °C (1600 and 13,000 ppmv), whereas torrefied wood chips emitted the lowest of about <200 and <2000 ppmv. Carbon dioxide (CO<sub>2</sub>) emissions from wood pellets were 3000 ppmv and 42,000 ppmv, whereas torrefied wood chips registered at about 2000 and 25,000 ppmv, at 20 and 40 °C at the end of 11 days of storage. CO emission factors (milligrams per kilogram of biomass) calculated were lowest for ground switchgrass and torrefied wood chips (2.68 and 4.86 mg/kg) whereas wood pellets had the highest CO of

about 10.60 mg/kg, respectively, at 40 °C after 11 days of storage. In the case of CO<sub>2</sub>, wood pellets recorded the lowest value of 55.46 mg/kg, whereas switchgrass recorded the highest value of 318.72 mg/kg. This study concludes that CO emission factor is highest for wood pellets, CO<sub>2</sub> is highest for switchgrass and CH<sub>4</sub> is negligible for all feedstocks except for wood pellets, which is about 0.374 mg/kg at the end of 11-day storage at 40 °C.

**Keywords:** storage off-gas; wood chips; torrefied wood chips; wood pellets; switchgrass; emission factor

---

## 1. Introduction

Woody and herbaceous biomasses, stored in humid environments for long periods, will absorb moisture and decompose, bringing about changes in physical properties, chemical composition and energy value [1]. The same authors found that after one year of storage, wood chips lost about 25%–55% of their energy value, which is mainly due to moisture adsorption. These changes in the physical, chemical and energy properties can decrease the market value of the fuels. Wood chips with high moisture are sensitive to biochemical reactions during storage [2,3]. Zoch *et al.* [4] indicated that chips from whole-tree aspen release much more heat and lose dry weight six times faster than clean, debarked chips. Moran [5] reported that the decay rate for mixed hardwood whole-tree chips (mainly oak) stored in an outside pile was roughly three times that for clean, debarked chips. Their research indicated that temperature profile of the wood chips stored for 7–14 days rose to 60–70 °C due to chemical and biological reactions that release oxygen-depleting off gases, such as CO, CO<sub>2</sub>, and CH<sub>4</sub>, during storage. Quantification of these off-gases has been considered important because fatal accidents have been reported at wood-chip and pellet warehouses during material unloading [6]. The risks associated with the transportation of seemingly harmless cargo (wood pellets and wood chips) are now well known and recorded. Several researchers have indicated that at storage temperatures >30 °C wood chips and wood pellets emit high amounts of CO (>10,000 ppmv), CO<sub>2</sub> (>30,000 ppmv), and CH<sub>4</sub> emission (>2000 ppmv) [7–13]. These reported CO and CO<sub>2</sub> emissions for wood chips and wood pellets are well above the threshold concentration levels established by U.S. Department of Labor Occupational Safety and Health Administration. According to Back and Allen [14], Höll and Pieczonka [15], and Piispanen and Saranpää [16], dry woods like Scots pine and Norway spruce contain about 3%–5% triglycerides, which can undergo oxidation and yield hexanal and other off-gases (such as CO). Svedberg *et al.* [11] indicated that in addition to CO, wood pellets also emitted hexanal during storage.

The threshold level established by U.S. Department of Labor Occupational Safety and Health Administration for carbon monoxide concentration is 35 ppm for a time-weighted 8-h period. Concentration levels ≥800 ppm for 45 min can result in dizziness, nausea, and convulsions resulting in death after a 2–3 h period. The threshold level of CO<sub>2</sub> is 5000 ppm as an 8-h time-weighted average. At very high levels (30,000 ppm (short-term exposure level) and above), CO<sub>2</sub> can cause asphyxiation as it replaces oxygen in the blood resulting in loss of judgment, dizziness, drowsiness, and rapid breathing. The CH<sub>4</sub> threshold level is 500,000 ppm over 8-h time-weighted average. Higher concentrations can result in asphyxiation by displacing oxygen. CH<sub>4</sub> is also one of the main constituents of natural gas, which can

result in explosions [7]. In addition to the safety issues, the emissions from biomass can have a significant effect on the greenhouse gas emissions. Emery and Mosier [17] indicated that during storage of biomass, the dry matter losses can increase net greenhouse gas emissions. The same authors suggested a greater understanding of the biomass storage losses and greenhouse gas fluxes is necessary to accurately assess biomass storage options to ensure the design of the biomass supply logistics system meets the greenhouse gas reduction mandates required for biofuel production.

Increasing the storage stability or reducing reactivity of the biomass to the storage environment can help reduce the storage off-gas emissions. In general, both woody and herbaceous biomass is dried to 10% (w.b.) moisture content in a rotary drier to increase their storage stability. This dried biomass is further used for pelletization [18]. Pellets are considered as stable products as they have moisture in the range of 5%–7% (w.b.). Currently, torrefaction (a thermal pretreatment process) helps reduce the biomass moisture content to a very low value about <2% (w.b.) making it hydrophobic and suitable for thermochemical applications like pyrolysis, gasification, and co-firing [19–23]. Torrefaction of biomass is a thermochemical process that can be described as a mild form of pyrolysis at temperatures typically ranging between 200 and 300 °C in an inert and reduced environment, resulting in a solid, uniform product with lower moisture and higher energy content [24–27]. Tumuluru *et al.* [19] described the physiochemical and structural changes in biomass at different temperature regimes. Torrefaction temperatures >200 °C result in breakage of inter- and intra-molecular, hydrogen, C–O, and C–C bonds. Breaking chemical bonds leads to the emission of hydrophilic and oxygenated compounds [19]. Also, the destruction of OH groups during torrefaction makes biomass hydrophobic and increases storage stability [28].

### Objective

There is a great deal of interest in understanding the off-gas emissions during storage of different biomass forms used for energy applications. Most of the data reported on storage off-gas emissions were for wood pellets and wood chips. Our earlier work on profiling and quantifying the off-gases [7–10,13] from wood pellets has helped the Wood Pellets Association of Canada to develop material safety data sheets for storage and transportation. Off-gas emissions data for other feedstocks—like switchgrass, and thermally pretreated (torrefied) biomass—that are gaining popularity for bioenergy applications, are not available. The off-gas emission data for herbaceous and torrefied biomass will be very useful in understanding the health-hazard risks and proposing mitigation methods and also will help to develop material safety data sheets for their safe storage and transportation. Our earlier studies on wood pellets indicated that increasing the storage temperature to >30 °C increases the off-gas emissions exponentially during the first 10 days of storage, whereas storage temperatures ≤20 °C resulted in a linear increase in off-gas emission with respect to storage time [7,13]. The specific objective of this study is to examine off-gas-emission concentration from torrefied wood chips, ground switchgrass, raw wood chips, and wood pellets at a 20 °C room temperature and an elevated storage temperature of 40 °C for an 11-day storage period. Further emission-concentration data for all the feedstock was used to calculate an emission factor (milligrams of off-gas emitted per kilogram of biomass).

## 2. Material and Methods

### 2.1. Raw Material and Properties

Clean pine-wood chips and wood pellets were collected from a shipping location in Vancouver, BC, Canada (Fibreco, Inc., North Vancouver) and tested for moisture content. The procured wood chips were further torrefied at 250 °C for 30 min in a fixed-bed reactor and then cooled and stored in airtight containers. Wood chips were dried to about 10% moisture content (w.b.) in a convective oven at 40–50 °C. Switchgrass (*Panicum virgatum*) was procured from a farm in Manitoba and ground to a 2-mm particle size using a hammer mill. The ground samples were stored in air-sealed bags in a commercial refrigerator set at 4 °C. Off-gassing experiments were conducted in the same year (2007–2008) the feedstocks were procured. The moisture content of the wood chips, ground switchgrass, torrefied wood chips, and wood pellets at the beginning of these experiments was determined using the AOAC method (*i.e.*, the oven method, where the biomass was kept at 105 °C for 24 h and was expressed in wet basis) [29]. The reported values are an average of three measurements. All raw materials were further tested for bulk and particle density following the ASABE S267 standard procedure [30,31].

### 2.2. Particle Density and Porosity

A gas multi-pycnometer (QuantaChrome, Boynton Beach, FL, USA) was used to determine the particle density of the feedstocks by calculating the displaced volume of nitrogen gas by a known mass of sample material [31]. The pressure was set at around 40 kPa (near maximum as specified by the instrument specifications). Equation (1) is used to calculate the sample volume ( $V_p$ ):

$$V_p = V_c - V_R \left( \frac{P_1}{P_2} - 1 \right) \quad (1)$$

where:

$P_1$  = pressure reading after pressurizing the reference cell (kPa)

$P_2$  = pressure after connecting the reference cell to the sample cell

$V_c$  = sample volume

$V_R$  = reference volume.

The particle density ( $\rho_s$ ) of the sample is calculated by dividing mass ( $m_p$ ) by the pycnometer particle volume ( $V_{pvc}$ ). The experiments were conducted in triplicates. The porosity values were calculated using the bulk and particle-density values using Equations (2) and (3):

$$\rho_s = \frac{m_p}{V_{pvc}} \quad (2)$$

$$\text{Porosity} = \left( 1 - \frac{\rho_b}{\rho_s} \right) \quad (3)$$

where:

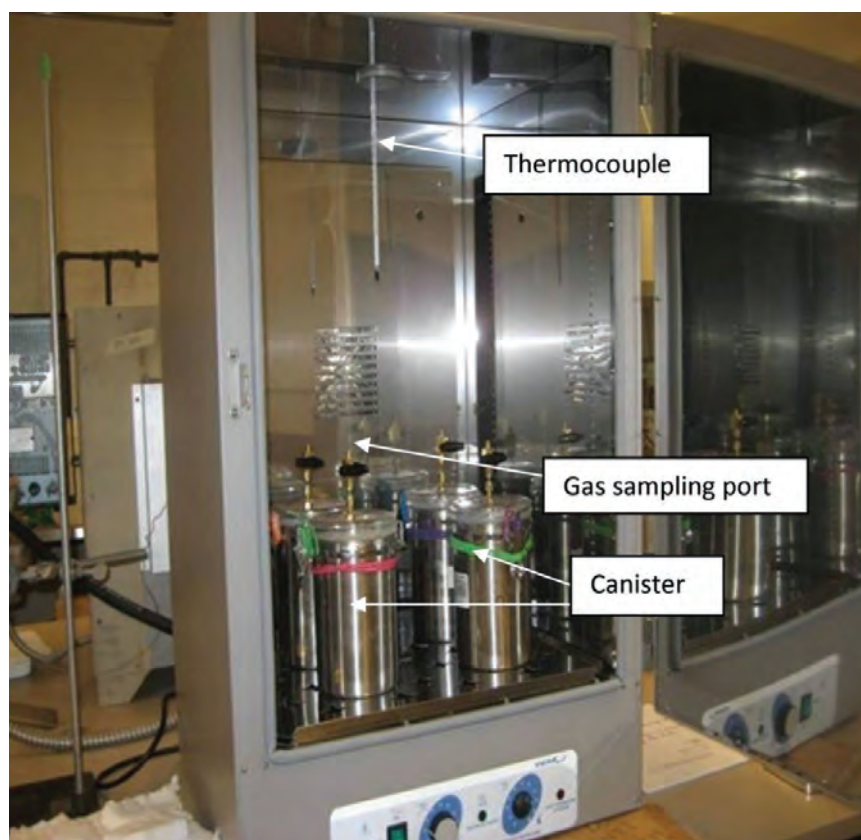
$\rho_b$  = bulk density

$\rho_s$  = particle density.



### 2.3. Off-Gas Measurement

Canisters were used to conduct the storage studies (Figure 1). Canisters were filled to about 95% of their volume with different feedstocks. A 3.125-mm-diameter port with a control valve installed on the canister lid was used to collect the off-gas samples. The different biomass materials (*i.e.*, wood chips, wood pellets, torrefied wood chips, and ground switchgrass) were placed in the canister, leaving a headspace of about 5%. In the present study, a minimum head space of 5% was selected based on our earlier study on storage of wood pellets at both low and high storage temperatures [13]. Studies at 20 °C were carried out in a laboratory set at 20 °C and the higher temperature of 40 °C using a laboratory oven. A gas chromatography (GC)-14A fuel-cell analyzer (Shimadzu, Kyoto, Japan) was used to analyze the off-gas samples. A standard gas composition of CO: 1000 ppmv; CO<sub>2</sub>: 5000 ppmv; and CH<sub>4</sub>: 1000 ppmv was used to calibrate the GC. Approximately 10-mL off-gas sample was collected using an airtight syringe (A-85137-20 mL SGE Gas-Tight Syringe, Luer-Lock, Mandel Scientific, Guelph, ON, Canada) and injected into the GC-14A [7,13]. In the present study off-gas measurements reported are from single measurements by other researchers [7–13,32].



**Figure 1.** Storage canisters filled with different feedstocks.

### 2.4. Emission Factor Calculation

Yazdanpanah *et al.* [32] used concentration data to calculate the emission factor (milligrams of off-gas per kilogram of material). Table 1 indicates the equations constants used in the emission factor calculation. At constant temperature  $T$  (K) and pressure  $P$  (Pa), the emission factor ( $f_i$ ) (milligrams of

off-gas per kilogram of materials, mg/kg) is related to volumetric gas concentration ( $C_i$ ), as expressed in Equation (4):

$$f_i = \frac{PC_i V g M_{wt}}{RTM} \times 1000 \quad (4)$$

where:

$R$  = gas constant (8.31 J/mol·K)

$T$  = temperature (K)

$M_{wt}$  = gas molecular weight (g/mole)

$M$  = mass of material in the container (kg)

$V_g$  = gas volume in the container (m<sup>3</sup>)

$P_a$  = absolute pressure of the container (generally, there is minimal change in  $P_a$  at relatively low temperatures associated with the observed tests [7]). In their study, pressure in the storage container was measured using a pressure transducer (PX143-01BD5V, 91 Pa, Omega, Laval, QC, Canada) and the data was logged into a computer using LabVIEW software

$C_i$  = volumetric concentration of a particular off-gassing measure by GC (expressed as fraction volume/volume).

**Table 1.** Constants used for emission factor (g/kg) calculation based on off-gas concentration data.

| S. No. | Equation Parameters                                                             | Value                                                                                                       |
|--------|---------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| 1      | Molecular weight of CO, CO <sub>2</sub> , and CH <sub>4</sub> ( $M_{wt}$ )      | 28, 44, and 16                                                                                              |
| 2      | Volumetric concentration of particular off gas (m <sup>3</sup> )                | Gas concentrations measured using GC (ppmv/1,000,000)                                                       |
| 3      | Temperature (K)                                                                 | 293 and 313                                                                                                 |
| 4      | Pressure (Pa)                                                                   | 101,300                                                                                                     |
| 5      | Gas constant ( $R$ ) (J/mol·K)                                                  | 8.31                                                                                                        |
| 6      | Mass of the biomass stored in the container ( $m_w$ ) (kg)                      | Ground switchgrass: 0.36<br>Wood pellets: 1.60<br>Wood chips: 0.64<br>Torrefied wood chips: 0.54            |
| 7      | Volume of the gas in the container, including headspace of 5% (m <sup>3</sup> ) | Ground switchgrass: 0.0021<br>Wood pellets: 0.00119<br>Wood chips: 0.00152<br>Torrefied wood chips: 0.00154 |

Note: Volume of gas in the container calculation was based on the bulk porosity of the materials. The porosity calculation was based on the bulk and particle-density values.

Equation (5) presents the sample calculation for emission factor (mg/kg) for off-gas CO at the end of 11-day storage at 40 °C storage temperature. The various constants used for calculation of emission factor are given below:

$$\frac{101300 \times 13294.7 \times 0.00118 \times 28 \times 1000}{8.31 \times 313 \times 1.6 \times 1000000} = 10.69 \text{ mg/kg} \quad (5)$$

where CO concentration at 40 °C for wood pellets at the end of 11-day storage: 13,294 ppmv ( $0.013294 \text{ m}^3$ ); storage temperature: 40 °C (313 K); porosity: 0.41 (calculated using bulk density:  $710 \text{ kg/m}^3$ ; and particle density:  $1210 \text{ kg/m}^3$ ); total porosity (including headspace of 5% of the container):  $0.41 + 0.05 = 0.46$ ; volume of the container ( $\text{m}^3$ ): 0.00256; gas volume in the container: total porosity (including 5% of headspace)  $\times$  volume of the container:  $0.00118 \text{ m}^3$ ; mass of wood pellets in the container: 1.60 kg; molecular weight of CO: 28 (g/mole); absolute pressure in the container: 101,300 (Pa) and gas constant (R):  $8.31 \text{ (J/mol}\cdot\text{K)}$ .

### 3. Results and Discussion

#### 3.1. Physical Properties

The moisture content and bulk- and particle-density of wood chips, ground switchgrass, torrefied wood chips, and wood pellets are given in Table 2. Leaving a headspace of 5%, ground switchgrass of about 0.36 kg, wood pellets of about 1.60 kg, wood chips of about 0.64 kg, and torrefied wood chips of about 0.54 kg were used to fill the storage canister.

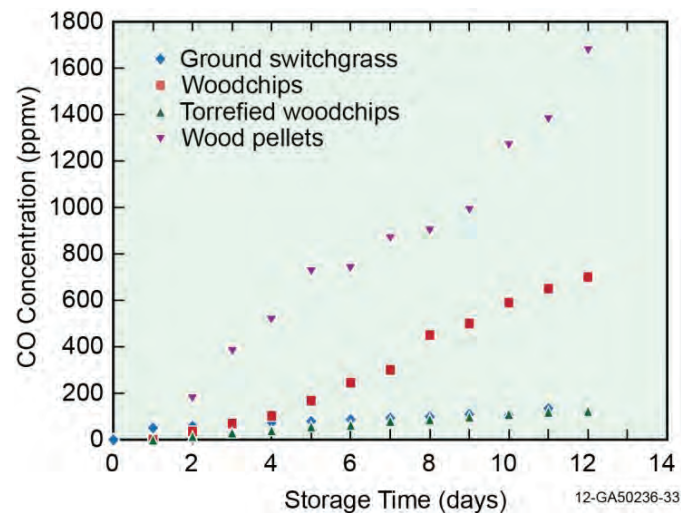
**Table 2.** Physical properties of herbaceous, woody and torrefied biomass ( $n = 3$ ).

| S. No. | Biomass Feedstock    | Moisture Content<br>(%, w.b.) | Bulk Density<br>( $\text{kg/m}^3$ ) | Particle Density<br>( $\text{kg/m}^3$ ) | Porosity |
|--------|----------------------|-------------------------------|-------------------------------------|-----------------------------------------|----------|
| 1      | Ground switchgrass   | $10.21 \pm 0.21$              | $151 \pm 9$                         | $650 \pm 21$                            | 0.76     |
| 2      | Wood pellets         | $5.02 \pm 0.16$               | $710 \pm 19$                        | $1210 \pm 8$                            | 0.41     |
| 3      | Wood chips           | $12.12 \pm 0.12$              | $265 \pm 12$                        | $580 \pm 17$                            | 0.54     |
| 4      | Torrefied wood chips | $1.8 \pm 0.19$                | $225 \pm 23$                        | $505 \pm 11$                            | 0.55     |

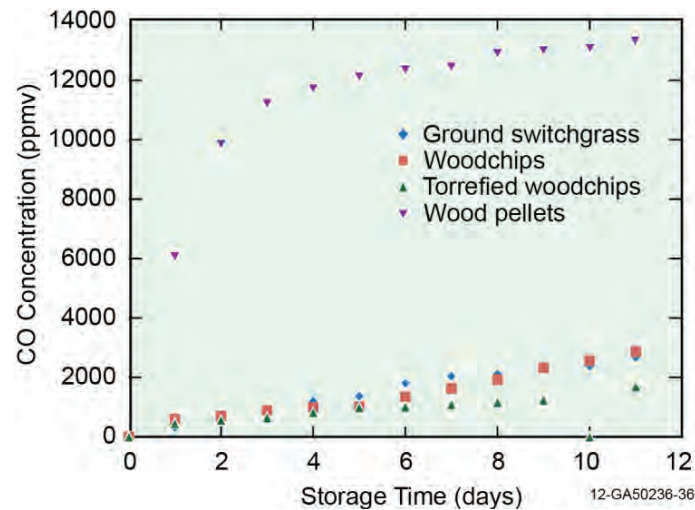
#### 3.2. Off-Gas Concentrations

Figures 2 through 7 indicate the emission levels of CO, CO<sub>2</sub>, and CH<sub>4</sub> from ground switchgrass, wood chips, torrefied wood chips, and wood pellets at both 20 and 40 °C for a storage period of 11 days. Figure 2 indicates that the maximum CO emissions were recorded by wood pellets (about 1600 ppmv), followed by wood chips (about 600 ppmv); torrefied wood chips and switchgrass emitted significantly less CO (less than 200 ppmv). Figure 3 shows that a maximum concentration of about 13,000 ppmv was recorded for wood pellets at 40 °C; however, torrefied wood chips show the lowest recorded amount of about 2000 ppmv. Wood chips and ground switchgrass recorded about 3000 ppmv. CO<sub>2</sub> emissions from the four biomass feedstocks at 20 °C indicated that wood pellets emitted a maximum of about 3000 ppmv; switchgrass and torrefied wood chips recorded the lowest amounts (2000 ppmv) (see Figure 4). At 40 °C, wood pellets emitted about 42,000 ppmv, which corroborates results reported in the literature [7–13], whereas torrefied wood chips emitted the lowest CO<sub>2</sub> amounts at about 25,000 ppmv. Wood chips and switchgrass registered at about 30,000 ppmv (see Figure 5). Figures 6 and 7 show the CH<sub>4</sub> emissions at 20 °C and at 40 °C. The torrefied wood chips recorded the lowest CH<sub>4</sub> amounts (about 5 ppmv) at 20 °C, while the wood pellets registered about 45 ppmv. These concentrations can be considered marginal when compared to CO and CO<sub>2</sub> emissions. At 40 °C, the wood pellet samples registered at about 1300 ppmv, which was by far the highest compared with other feedstocks. The torrefied wood chips recorded the lowest amounts, less than 100 ppmv.

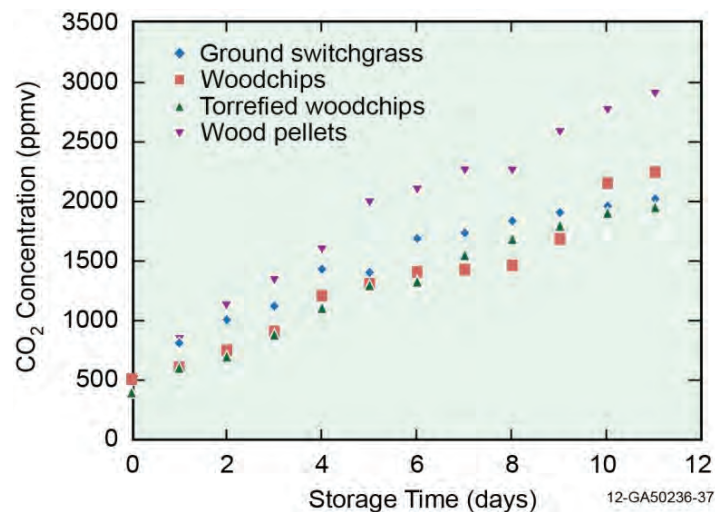




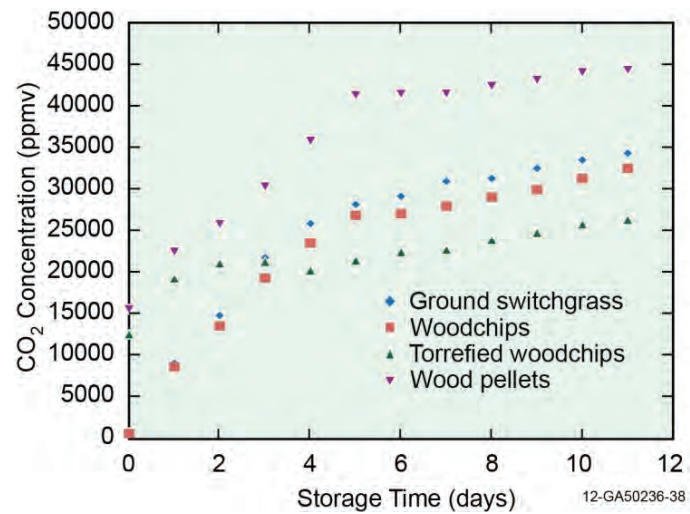
**Figure 2.** CO concentration at 20 °C storage temperature.



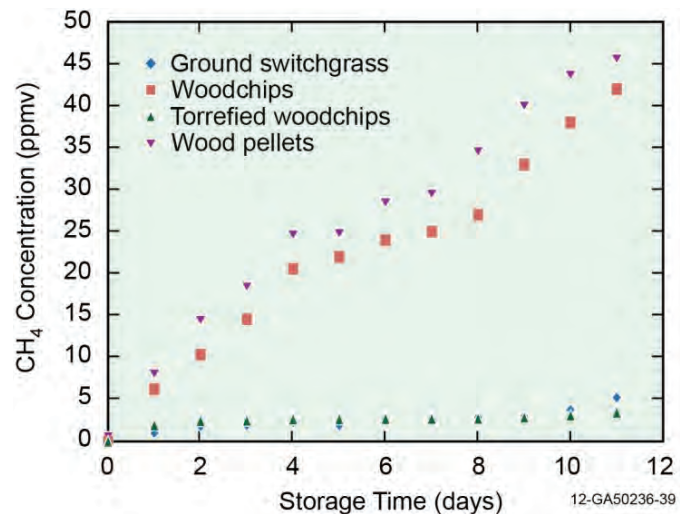
**Figure 3.** CO concentration at 40 °C storage temperature.



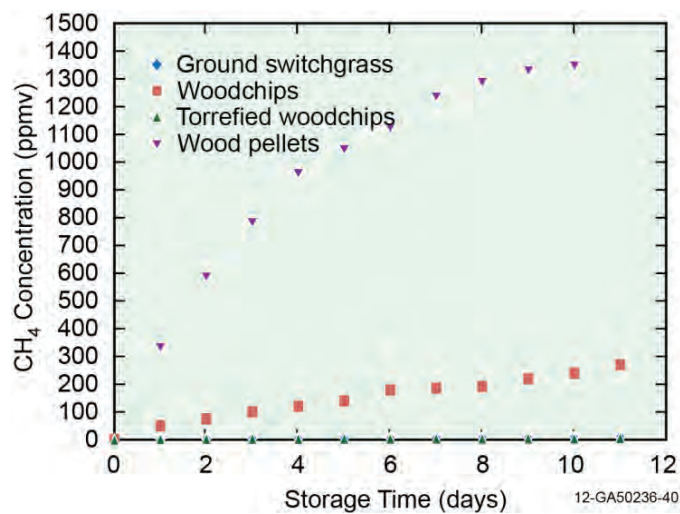
**Figure 4.** CO<sub>2</sub> concentration at 20 °C storage temperature.



**Figure 5.** CO<sub>2</sub> concentration at 40 °C storage temperature.



**Figure 6.** CH<sub>4</sub> concentration at 20 °C storage temperature.



**Figure 7.** CH<sub>4</sub> concentration at 40 °C storage temperature.

### 3.3. Emission Factor (mg/kg)

Based on the concentration data, emissions factors were calculated for CO, CO<sub>2</sub>, and CH<sub>4</sub> from ground switchgrass, wood chips, torrefied wood chips, and wood pellets stored at both 20 and at 40 °C for an 11-day period. A maximum CO-emission factor of about 10.60 and 6.96 mg/kg was recorded by wood pellets and wood chips, respectively. The lowest CO-emission factor for ground switchgrass was recorded at about 2.67 mg/kg at 40 °C, whereas in the case of torrefied woodchips and ground switchgrass it was about 4.85 and 2.68 mg/kg at the end of the 11-day storage period. At 20 °C, the highest CO-emission factor of 1.81 and 1.43 mg/kg were recorded for wood chips and wood pellets, whereas ground switchgrass and torrefied woodchips recorded 0.38 and 0.85 mg/kg at the end of the 11-day storage period.

For CO<sub>2</sub> stored at 40 °C, a maximum emission factor was recorded for ground switchgrass at about 318.72 mg/kg, followed by 123.50 and 118.68 mg/kg for wood chips and torrefied wood chips, respectively, whereas wood pellets recorded the lowest at about 55.45 mg/kg at the end of the 11-day storage period. At 20 °C, the trend was similar, where ground switchgrass recorded the highest value of 19.98 mg/kg, followed by torrefied and regular wood chips of about 9.39 and 9.09 mg/kg, respectively. Wood pellets recorded the lowest of 3.86 mg/kg at the end of the 11-day storage period. The calculated CH<sub>4</sub>-emission factor indicated that at 20 °C, the values are very low for all the feedstocks, whereas, at 40 °C, wood pellets recorded the highest emission factor of about 0.76 mg/kg, and torrefied wood chips, the lowest, at about 0.0104 mg/kg. The emission-factor data for CO, CO<sub>2</sub> and CH<sub>4</sub> calculated for wood pellets has corroborated observations reported in the literature [32]. The same authors indicated that the emission factors calculated for off gases like CO, CO<sub>2</sub>, and CH<sub>4</sub> from wood pellets for two different-sized storage containers (5200 L and 45 L) were close and also matched closely with the present observations. We have learned from this study that the emission factor calculated based on the concentrations, is strongly dependent on physical properties like bulk and particle density and porosity, which determines the gas volume in the storage container.

### 3.4. Discussion

In the present study, torrefied wood chips emitted less CO and CH<sub>4</sub> at both 20 and 40 °C than ground switchgrass, woodchips, or wood pellets. Tumuluru *et al.* [19] suggested that, during torrefaction, the biomass loses some of the low-volatility components and extractives, resulting in a hydrophobic product low in moisture content. These changes in the biomass might result in reduced biomass reactivity in the storage environment and fewer chemical-oxidation reactions during storage. Emissions from torrefied biomass reported in this paper indicate that microbial degradation may not be the reason for off-gas emission, because torrefied biomass has less moisture (Table 2) and absorbs little moisture during storage [19]. The measured emissions could have occurred mainly due to chemical oxidation of the chemical components present in the biomass. According to Yazdanpanah [33], torrefied pellets adsorbed about 20% more CO<sub>2</sub> compared to regular pellets. This may be explained by the rate of reaction between off-gas and biomass solid, which is generally proportional to the accessible surface area of the solid. The lower CO<sub>2</sub> emission detected by torrefied samples in this study could be attributed to the higher adsorption of CO<sub>2</sub> by torrefied samples. The speculation is that the torrefaction process causes

dehydration and thus initiates and propagates cracks in the lignocellulosic structure of material. The mass loss also induced changes in density and porosity.

Our earlier studies on off-gases from woody pellets at lower ( $\leq 20$  °C) and higher ( $\geq 30$  °C) temperatures indicated that CO and CO<sub>2</sub> emissions and O<sub>2</sub> depletion in the headspace of the storage container are significantly lower at low storage temperatures compared to higher storage temperature. This study has helped us conclude that it is mostly chemical oxidation that results in off-gas emissions from stored wood pellets [7,13], where higher storage temperature accelerates the rate of the oxidation process. The CO, CO<sub>2</sub>, and CH<sub>4</sub> off-gas emissions observed from different biomass in the present study can be due to auto-oxidation of the chemical compounds in the biomass. The storage temperature acts as a catalyst to accelerate the chemical oxidation process. Research studies conducted by Back and Allen [14], Höll and Pieczonka [15], and Piispanen and Saranpää [16] on woody biomass (Scots pine and Norway spruce) indicated that triglycerides undergo auto-oxidation in the presence of temperature and emit off-gases like CO and hexanal. Springer and Hajny [34], Kuber *et al* [35], and Kuber [36,37] have established that auto-oxidation of unsaturated fatty acids and other extractives leads to spontaneous heating of wood chips and sawdust during storage. According to Levitt *et al.* [38], when stored at room temperature (particularly in the presence of air and light), organic matter emits small amounts of CO and the emissions are accelerated at elevated temperatures. Svedberg *et al.* [11,12] and Tumuluru *et al.* [13] reported that the emission of these off-gases during storage is due to chemical oxidation of fatty acids, leading to the formation of free radicals. These types of reactions are accelerated by: (a) the environmental conditions of storage, such as temperature and relative humidity; and (b) the biomass-feedstock moisture content and chemical composition. Also, the present study indicates that the off-gas emission concentration varies with the type of the biomass. One major reason for different concentrations observed for different raw and thermally-pretreated biomass feedstock can be different chemical composition (*i.e.*, woody biomass has higher fatty acids and lignin compared to herbaceous biomass). On the other hand, herbaceous biomasses are lower in lignin and free fatty acids [39,40]. Further research is needed to understand the chemistry behind different quantities of off-gas emissions from different biomass feedstocks.

At present, there is a great need to understand the biomass storage losses in terms of dry matter and greenhouse gas fluxes to assess biomass storage options to ensure the design of the biomass supply logistics system which can meet the greenhouse gas reduction requirements for biofuel production. According to Steele *et al.* [41], CO<sub>2</sub> gas emitted during storage due to decomposition process can be used to estimate the dry matter loss. According to their analysis the dry matter breakdown into simple sugars during storage and emits CO<sub>2</sub>. Also, the off-gas emission data collected for different woody, herbaceous, and pretreated biomass will help design storage silos by taking into account the hazards associated with off-gases that are emitted and avoid fatal accidents that have been reported in pellet warehouses. This will help mitigate the risks, adopt active control measures, and implement safe working strategies. The off-gas data on herbaceous and thermally-pretreated biomass (like torrefied biomass presented in this paper) will also support developing material safety data sheets for safe storage and transportation of woody, herbaceous and thermally pretreated biomasses.



#### 4. Conclusions

The present experimental study demonstrates that there is off-gassing from stored wood pellets, wood chips, ground switchgrass, and torrefied wood chips posing potential hazards that require mitigation by the proper design of silos and development of safe handling procedures. CO emissions for all the feedstocks at room temperature (20 °C) are above the threshold-level exposure guidelines of 35 ppmv for an occupational setting and 9 ppmv for homes. At the elevated storage temperature of 40 °C, the off-gases CO and CO<sub>2</sub> increase to levels where they could produce fatal accidents within short exposure times. The results indicate that torrefied wood chip emits less CO, CO<sub>2</sub>, and CH<sub>4</sub> when compared to wood pellets, untreated wood chips, and ground switchgrass. At 20 and 40 °C, wood pellets recorded the maximum CO concentrations of 1600 and 13,000 ppmv, whereas torrefied wood chips emitted less than 200 and 2000 ppmv. CH<sub>4</sub> emissions recorded for all the feedstocks were less than 100 ppmv at both 20 and 40 °C, except for wood pellets, which recorded 1300 ppmv at 40 °C. The calculated CO emission factors (based on the bulk and particle density and porosity) indicate that wood pellets have the highest emission factor (10.60 mg/kg) at 40 °C, whereas in the case of CO<sub>2</sub>, the wood pellets recorded the lowest value (55.46 mg/kg), and switchgrass the highest value (318.72 mg/kg).

#### Acknowledgments

The reported experimental project was conducted at the University of British Columbia. We thankfully acknowledge the financial support of Wood Pellets Association of Canada and Natural Sciences and Engineering Research Council of Canada under a Collaborative Research and Development Project. We also acknowledge the support from the Department of Energy (DOE) Office of Bioenergy Technology Office, the author Jaya Shankar Tumuluru is an employee of Idaho National Laboratory under Energy Efficiency and Renewable Energy under DOE Idaho Operations Office Contract DE-AC07-05ID14517. The author Shahab Sokhansanj is an employee of Oak Ridge National Laboratory. Accordingly, the U.S. Government retains and the publisher, by accepting the article for publication, acknowledges that the U.S. Government retains a nonexclusive, paid-up, irrevocable, worldwide license to publish or reproduce the published form of this manuscript, or allow others to do so, for U.S. Government purposes. The authors would also like to acknowledge Idaho National Laboratory's R&D Publications Support Team for their editorial and graphics assistance.

#### Author Contributions

Jaya Shankar Tumuluru conducted the experiments, collected and analyzed the off-gas data, and prepared the draft manuscript. Xingya Kuang and Fahimeh Yazdanpanah supported the experimental work and data analysis, Shahab Sokhansanj, C. Jim Lim, and Xiaotao T. Bi are research advisors on biomass storage, and Staffan Melin is research advisor on wood pellet storage.

#### U.S. Department of Energy Disclaimer

This information was prepared as an account of work sponsored by an agency of the U.S. Government. Neither the U.S. Government nor any agency thereof, nor any of their employees, makes any warranty, express or implied, or assumes any legal liability or responsibility for the accuracy,

completeness, or usefulness of any information, apparatus, product, or process disclosed, or represents that its use would not infringe privately owned rights. References herein to any specific commercial product, process, or service by trade name, trademark, manufacturer, or otherwise do not necessarily constitute or imply its endorsement, recommendation, or favoring by the U.S. Government or any agency thereof. The views and opinions of the authors expressed herein do not necessarily state or reflect those of the U.S. Government or any agency thereof.

### Conflicts of Interest

The authors declare no conflict of interest.

### References

1. Thoernquisit, T.; Lundstroem, H. Health hazards caused by fungi in stored wood chips. *For. Prod. J.* **1982**, *32*, 11–12.
2. Isenberg, I.H. *Pulpwoods of the US and Canada, Volume II: Hardwoods*, 3rd ed.; The Institute of Paper Chemistry: Appleton, WI, USA, 1981.
3. Feist, W.C.; Springer, E.L.; Hajny, G.J. Spontaneous heating in piled wood chips-contribution of bacteria. *TAPPI* **1973**, *56*, 148–151.
4. Zoch, L.L., Jr.; Springer, E.L.; Hajny, D.J. Storage of aspen whole-tree chips under laboratory conditions. In *USDA Forest Service Research Paper*; FPL 288; Forest Products Laboratory: Madison, WI, USA, 1976.
5. Moran, J.S. Kraft mill experience with whole-tree chips. In *TAPPI Annual Meeting, NY, February 1975*; TAPPI: Atlanta, GA, USA, 1975.
6. Johansson, L.S.; Leckner, B.; Gustavsson, L.; Cooper, D.; Tullin, C.; Potter, A. Emission characteristics of modern and old-type residential boilers fired with wood logs and wood pellets. *Atmos. Environ.* **2004**, *38*, 4183–4195.
7. Tumuluru, J.S.; Kuang, X.; Sokhansanj, S.; Lim, C.J.; Bi, X.T.; Melin, S. Development of laboratory studies on the off-gassing of wood pellets. *Can. Biosyst. Eng.* **2010**, *52*, 8.1–8.9.
8. Kuang, X.; Shankar, T.J.; Bi, X.T.; Sokhansanj, S.; Lim, C.J.; Melin, S. Characterization and kinetics study of off-gas emission from stored wood pellets. *Ann. Occup. Hyg.* **2008**, *52*, 675–683.
9. Kuang, X.; Shankar, T.J.; Bi, X.T.; Lim, C.J.; Sokhansanj, S.; Melin, S. Rate and peak concentrations of off-gas emissions in stored wood pellets-sensitivities to temperature, relative humidity, and headspace volume. *Ann. Occup. Hyg.* **2009**, *53*, 789–796.
10. Kuang, X.; Shankar, T.J.; Sokhansanj, S.; Lim, C.J.; Bi, T.X.; Melin, S. Effects of headspace volume ratio and oxygen level on off-gas emissions from stored wood pellets. *Ann. Occup. Hyg.* **2009**, *53*, 807–813.
11. Svedberg, U.R.A.; Hogberg, H.E.; Hogberg, J.; Galle, B. Emission of hexanal and carbon monoxide from storage of wood pellets, a potential occupational and domestic health hazard. *Ann. Occup. Hyg.* **2004**, *48*, 339–349.
12. Svedberg, U.; Samuelsson, J.; Melin, S. Hazardous off-gassing of carbon monoxide and oxygen depletion during ocean transportation of wood pellets. *Ann. Occup. Hyg.* **2008**, *52*, 259–266.

13. Tumuluru, J.S.; Sokhansanj, S.; Lim, C.J.; Bi, X.T.; Kuang, X.; Melin, S. Effect of storage temperatures on headspace gas composition and physical properties of wood pellets. *Int. Wood Prod. J.* **2012**, *4*, 207–216.
14. Back, E.L.; Allen, L.H. *Pitch Control, Wood Resin and Deresination*; TAPPI Press: Atlanta, GA, USA, 2000.
15. Höll, W.; Pieczonka, K. Lipids in sap and heartwood of *Picea abies* (L.) Karst. *Z. Pflanzenphysiol.* **1978**, *87*, 191–198.
16. Piispanen, R.; Saranpää, P. Neutral lipids and phospholipids in Scots pine (*Pinus sylvestris*) sapwood and heartwood. *Tree Physiol.* **2002**, *22*, 661–666.
17. Emery, I.R.; Mosier, N.S. The impact of dry matter loss during herbaceous biomass storage on net greenhouse gas emissions from biofuels production. *Biomass Bioenergy* **2012**, *39*, 237–246.
18. Yancey, N.A.; Tumuluru, J.S.; Wright, C.T. Drying, grinding and pelletization studies on raw and formulated biomass feedstock's for bioenergy applications. *J. Biobased Mater. Bioenergy* **2013**, *7*, 549–558.
19. Tumuluru, J.S.; Sokhansanj, S.; Hess, J.R.; Wright, C.T.; Boardman, R.D. A review on biomass torrefaction process and product properties for energy applications. *Ind. Biotechnol.* **2011**, *7*, 384–401.
20. Tumuluru, J.S.; Hess, J.R.; Boardman, R.D.; Wright, C.T.; Westover, T.L. Formulation, pretreatment, and densification options to improve biomass specifications for co-firing high percentages with coal. *Ind. Biotechnol.* **2012**, *8*, 113–132.
21. Sarkar, M.; Kumar, A.; Tumuluru, J.S.; Patil, K.N.; Bellmer, D.D. Gasification performance of switchgrass pretreated with torrefaction and densification. *Appl. Energy* **2014**, *127*, 194–201.
22. Sarkar, M.; Kumar, A.; Tumuluru, J.S.; Patil, K.N.; Bellmer, D.D. Thermal devolatilization kinetics of switchgrass pretreated with torrefaction and densification. *Trans. ASABE* **2014**, *57*, 1199–1210.
23. Yang, Z.; Sarkar, M.; Kumar, A.; Tumuluru, J.S.; Huhnke, R.L. Effects of torrefaction and densification on switchgrass pyrolysis products. *Bioresource Technol.* **2014**, *174*, 266–273.
24. Tumuluru, J.S.; Boardman, R.D.; Wright, C.T. Response surface analysis of elemental composition and energy properties of corn stover during torrefaction. *J. Biobased. Mater. Biol.* **2012**, *6*, 25–35.
25. Tumuluru, J.S.; Boardman, R.D.; Wright, C.T.; Hess, J.R. Some chemical compositional changes in miscanthus and white oak sawdust samples during torrefaction. *Energies* **2012**, *5*, 3928–3947.
26. Bourgois, J.P.; Doat, J. Torrefied wood from temperate and tropical species, advantages and prospects. *Bioenergy* **1984**, *84*, 153–159.
27. Bourgois, J.P.; Guyonnet, R. Characterization and analysis of torrefied wood. *Wood Sci. Technol.* **1988**, *22*, 143–155.
28. Sokhansanj, S.; Peng, J.; Lim, C.J.; Bi, X.T.; Wang, L.; Lam, P.S.; Hoi, J.P.; Melin, S.; Tumuluru, J.S.; Wright, C.T. Optimum torrefaction and pelletization of biomass feedstock. In Proceedings of the TCS 2010 Symposium on Thermal and Catalytic Sciences for Biofuels and Biobased Products, Iowa State University, Ames, IA, USA, 21–23 September 2010.
29. Association of Official Analytical Chemist. *AOAC: Official Methods of Analysis*, 12th ed.; Association of Official Analytical Chemist: Washington, DC, USA, 1990.
30. *Cubes, Pellets and Crumbles-Definitions and Methods for Determining Density, Durability and Moisture Content*; ASAE Standards S269.4; The American Society of Agricultural and Biological Engineers (ASAE): St. Joseph, MI, USA, 1992.

31. Tumuluru, J.S.; Tabil, L.G.; Song, Y.; Iroba, K.L.; Meda, V. Grinding energy and physical properties of chopped and hammer-milled barley, wheat, oat, and canola straws. *Biomass Bioenergy* **2014**, *60*, 58–67.
32. Yazdanpanah, F.; Sokhansanj, S.; Lim, C.J.; Bi, X.T.; Melin, S. Stratification of off-gases in stored wood pellets. *Biomass Bioenergy* **2014**, *71*, 1–11.
33. Yazdanpanah, F. Evolution and Stratification of Off-Gasses in Stored Wood Pellets. Ph.D. Thesis, University of British Columbia, Vancouver/Kelowna, BC, Canada, 2013.
34. Springer, E.L.; Hajny, G.J. Spontaneous heating in piled wood chips. *TAPPI* **1970**, *53*, 85–86.
35. Kuber, H.; Wang, Y.R.; Barkalow, D. Generation of heat in wood between 80° and 130 °C. *Holzforschung* **1985**, *39*, 85–89.
36. Kuber, H. Air convection in self-heating piles of wood chips. *TAPPI* **1982**, *65*, 79–83.
37. Kuber, H. Heat generating processes as cause of spontaneous ignition in forest products. *For. Prod. Abstr.* **1987**, *10*, 299–327.
38. Levitt, M.D.; Ellis, C.; Springfield, J.; Engel, R.R. Carbon monoxide generation from hydrocarbons at ambient and physiological temperature: A sensitive indicator of oxidant damage? *J. Chromatogr.* **1995**, *695*, 324–328.
39. Tumuluru, J.S.; Wright, C.T.; Hess, J.R.; Kenney, K.L. A review of biomass densification systems to develop uniform feedstock commodities for bioenergy applications. *Biofuels Bioprod. Biorefin.* **2011**, *5*, 683–707.
40. Tumuluru, J.S.; Tabil, L.G.; Song, Y.; Iroba, K.L.; Meda, V. Impact of process conditions on the density and durability of wheat, oat, canola and barley straw briquettes. *Bioenergy Res.* **2014**, doi:10.1007/s12155-014-9527-4.
41. Steele, J.L.; Saul, R.A.; Hukill, W.V. Deterioration of shelled corn as measured by carbon dioxide production. *ASABE* **1969**, *12*, 685–689.





# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

### Air Quality - Part 70 Operating Permit Amendment

**Facility Name:** Hazlehurst Wood Pellets, LLC  
**Facility Address:** 430 Hulett Wooten Farms Road  
Hazlehurst, Georgia 31539 (Jeff Davis County)  
**Mailing Address:** P. O. Box 1810  
Hazlehurst, Georgia 31539  
**Parent/Holding Company:** Hazlehurst Wood Pellets  
**Facility AIRS Number:** 04-13-161-00023

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a construction permit for:

**Construction and operation of a new furnace and a dryer controlled by a WESP and RTO, 2 Green Hammermills, 7 Dry Hammermills controlled by cyclofilters and an RTO, 15 presses and 3 coolers controlled by baghouses and an RCO, and a chipper. All permit conditions in Sections 2 through Section 6 of the current permit are replaced. Section 1 of the current permit is updated.**

This Permit Amendment shall also serve as a final amendment to the Part 70 Permit unless objected to by the U.S. EPA or withdrawn by the Division. The Division will issue a letter when this Operating Permit amendment is finalized.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Amendment and Permit No. 2499-161-0023-V-02-0. Unless modified or revoked, this Amendment expires upon issuance of the next Part 70 Permit for this source. This Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in App No. **TV-352816** dated **May 6, 2019**; any other applications upon which this Amendment or Permit No. 2499-161-0023-V-02-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **22** pages.



---

Richard E. Dunn, Director  
Environmental Protection Division

## Table of Contents

|                 |                                                                                                                        |           |
|-----------------|------------------------------------------------------------------------------------------------------------------------|-----------|
| <b>PART 1.0</b> | <b>FACILITY DESCRIPTION.....</b>                                                                                       | <b>1</b>  |
| 1.3             | Process Description of Modification.....                                                                               | 1         |
| <b>PART 3.0</b> | <b>REQUIREMENTS FOR EMISSION UNITS.....</b>                                                                            | <b>3</b>  |
| 3.1.1           | Updated Emission Units.....                                                                                            | 3         |
| 3.2             | Equipment Emission Caps and Operating Limits .....                                                                     | 4         |
| 3.3             | Equipment Federal Rule Standards.....                                                                                  | 4         |
| 3.4             | Equipment SIP Rule Standards .....                                                                                     | 4         |
| 3.5             | Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit..... | 5         |
| <b>PART 4.0</b> | <b>REQUIREMENTS FOR TESTING .....</b>                                                                                  | <b>6</b>  |
| 4.1             | General Testing Requirements .....                                                                                     | 6         |
| 4.2             | Specific Testing Requirements .....                                                                                    | 7         |
| <b>PART 5.0</b> | <b>REQUIREMENTS FOR MONITORING (Related to Data Collection) .....</b>                                                  | <b>10</b> |
| 5.1             | General Monitoring Requirements.....                                                                                   | 10        |
| 5.2             | Specific Monitoring Requirements .....                                                                                 | 10        |
| <b>PART 6.0</b> | <b>OTHER RECORD KEEPING AND REPORTING REQUIREMENTS .....</b>                                                           | <b>16</b> |
| 6.1             | General Record Keeping and Reporting Requirements .....                                                                | 16        |
| 6.2             | Specific Record Keeping and Reporting Requirements.....                                                                | 19        |

**PART 1.0 FACILITY DESCRIPTION****1.3 Process Description of Modification**

The Permittee proposes to construct and operate one new furnace, one new dryer, one new chipper, 2 green hammermills, 7 dry hammermills, and 3 pellet lines with a total of 15 presses and 3 coolers. Some of the equipment will be new, some existing. The new wood-fired furnace will be rated at a nominal, approximate 200 MMBTU/hour. Particulate (PM) emissions from the furnace and dryer will be controlled with a wet electrostatic precipitator (WESP). PM emissions from the dry hammermills will be controlled by cyclofilters. PM emissions from the presses and coolers will be controlled by baghouses. Volatile organic compound (VOC) and organic hazardous air pollutant (HAP) emissions from the furnace and dryer will be controlled with a Regenerative Thermal Oxidizer (RTO). VOC and HAP emissions from the dry hammermills, presses, and coolers will be controlled with a Regenerative Catalytic Oxidizer (RCO). The RTO and RCO will each have a gas-fired burner rated at 6 MMBTU/hour. The new dryer has a capacity of 78 oven dried tons per hour, and an annual throughput capacity of 675,000 oven dried tons (ODT). ODT = weight of wood in short tons at 11% moisture, calculated.

**PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY**

**2.1 Facility Wide Emission Caps and Operating Limits**

- 2.1.1 The Permittee shall not discharge or cause the discharge into the atmosphere from the entire facility, any emissions which contain carbon monoxide (CO) in excess of 249 tons during any twelve consecutive months.  
[Avoidance of 40 CFR 52.21]
- 2.1.2 The Permittee shall not discharge or cause the discharge into the atmosphere from the entire facility, any emissions which contain nitrogen oxides (NOx) in excess of 249 tons during any twelve consecutive months.  
[Avoidance of 40 CFR 52.21]
- 2.1.3 The Permittee shall not discharge or cause the discharge into the atmosphere from the entire facility, any emissions which contain volatile organic compounds (VOC) in excess of 249 tons during any twelve consecutive months.  
[Avoidance of 40 CFR 52.21]
- 2.1.4 The Permittee shall not discharge or cause the discharge into the atmosphere from the entire facility, any emissions which contain particulate matter (PM) in excess of 249 tons during any twelve consecutive months.  
[Avoidance of 40 CFR 52.21]
- 2.1.5 The Permittee shall not discharge or cause the discharge into the atmosphere from the entire facility any single hazardous air pollutant which is listed in Section 112 of the Clean Air Act, in an amount equal to or exceeding 10 tons during any twelve consecutive months, or any combination of such listed pollutants in an amount equal to or exceeding 25 tons during any twelve consecutive months.  
[Avoidance of Major Source MACT per 40 CFR 63]
- 2.1.6 The Permittee shall not process through the dryer (DRY) greater than 675,000 ODT of wood during any twelve consecutive months. ODT = weight of wood in short tons at 11% moisture, calculated.  
[Avoidance of 40 CFR 52.21]

## Title V Permit Amendment

Hazlehurst Wood Pellets, LLC

Permit No.: 2499-161-0023-V-02-4

### PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

#### 3.1.1 Updated Emission Units

| Emission Units |                                                                      | Specific Limitations/Requirements                           |                                                                                                                                           | Air Pollution Control Devices |                                                                  |
|----------------|----------------------------------------------------------------------|-------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|------------------------------------------------------------------|
| ID No.         | Description                                                          | Applicable Requirements/Standards                           | Corresponding Permit Conditions                                                                                                           | ID No.                        | Description                                                      |
| WOOD           | Log storage/handling<br>Debarking/screening<br>Chipper<br>Chip piles | 391-3-1-.02(2)(n)                                           | 3.4.3, 3.4.4, 5.2.7, 5.2.8                                                                                                                |                               |                                                                  |
| GHM            | Green Hammermills (2)                                                | 391-3-1-.02(2)(n)                                           | 3.4.3, 3.4.4, 5.2.7, 5.2.8                                                                                                                |                               |                                                                  |
| FUR            | Wood fired furnace<br>200 MMBTU/hr                                   | 391-3-1-.02(2)(g)<br>391-3-1-.02(2)(b)<br>391-3-1-.02(2)(g) | 3.2.1, 3.2.3, 3.4.1, 3.4.2,<br>3.4.5, 4.2.1, 4.2.4, 4.2.5,<br>5.2.1, 5.2.2, 5.2.5, 5.2.6,<br>5.2.14, 5.2.15, 6.2.1-6.2.7                  | WESP                          | Wet<br>Electrostatic<br>Precipitator                             |
| DRY            | Pellet Dryer<br>78 ODT/hr                                            | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(n) | 2.1.6, 3.2.1, 3.2.3, 3.4.1,<br>3.4.2, 3.4.3, 3.4.4, 4.2.1,<br>4.2.4, 5.2.1, 5.2.2, 5.2.5,<br>5.2.6, 5.2.9, 5.2.14, 5.2.15,<br>6.2.1-6.2.7 | RTO                           | Regenerative<br>Thermal<br>Oxidizer                              |
| HAM1-7         | Dry Hammermills (7)                                                  | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(n) | 3.2.2, 3.2.4, 3.4.1, 3.4.2,<br>4.2.2, 4.2.4, 5.2.1, 5.2.3,<br>5.2.4, 5.2.6, 5.2.7, 5.2.8,<br>5.2.10-5.2.17, 6.2.3-6.2.7                   | CYFL1-7<br><br>RCO            | Cyclofilters<br>1-7<br><br>Regenerative<br>Catalytic<br>Oxidizer |
| PEL1-5         | Line 1 Presses (5)                                                   | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(n) | 3.2.2, 3.2.4, 3.4.1, 3.4.2,<br>4.2.2, 4.2.4, 5.2.1, 5.2.3,<br>5.2.4, 5.2.6, 5.2.7, 5.2.8,<br>5.2.9-5.2.17, 6.2.1-6.2.7                    | BH1                           | Baghouse 1                                                       |
| COOL1          | Line 1 Cooler                                                        |                                                             |                                                                                                                                           | RCO                           | Regenerative<br>Catalytic<br>Oxidizer                            |
| PEL6-10        | Line 2 Presses (5)                                                   | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(n) | 3.2.2, 3.2.4, 3.4.1, 3.4.2,<br>4.2.2, 4.2.4, 5.2.1, 5.2.3,<br>5.2.4, 5.2.6, 5.2.7, 5.2.8,<br>5.2.9-5.2.17, 6.2.1-6.2.7                    | BH2                           | Baghouse 2                                                       |
| COOL2          | Line 2 Cooler                                                        |                                                             |                                                                                                                                           | RCO                           | Regenerative<br>Catalytic<br>Oxidizer                            |
| PEL11-15       | Line 3 Presses (5)                                                   | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(n) | 3.2.2, 3.2.4, 3.4.1, 3.4.2,<br>4.2.2, 4.2.4, 5.2.1, 5.2.3,<br>5.2.4, 5.2.6, 5.2.7, 5.2.8,<br>5.2.9-5.2.17, 6.2.1-6.2.7                    | BH3                           | Baghouse 3                                                       |
| COOL3          | Line 3 Cooler                                                        |                                                             |                                                                                                                                           | RCO                           | Regenerative<br>Catalytic<br>Oxidizer                            |
| HAND           | Pellet<br>Handling/storage/<br>Loadout/silos 1-4                     | 391-3-1-.02(2)(b)<br>391-3-1-.02(2)(e)<br>391-3-1-.02(2)(n) | 3.4.1-3.4.5, 4.2.3, 6.2.4,<br>6.2.5                                                                                                       |                               |                                                                  |

\* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

### 3.2 Equipment Emission Caps and Operating Limits

- 3.2.1 The Permittee shall operate and maintain the WESP and the RTO during all periods in which the furnace (FUR) and the Dryer (DRY) are in operation.  
[391-3-1-.03(2)(c)]
- 3.2.2 The Permittee shall operate and maintain the cyclofilters (CYFL1-7), baghouses (BH1, 2, and 3), and Regenerative Catalytic Oxidizer (RCO) during all periods in which the Dry Hammermills (HAM1-7), Presses (PEL1-15), and Coolers (COOL1-3) are in operation.  
[391-3-1-.03(2)(c)]
- 3.2.3 The 3-hour rolling combustion temperature of the RTO shall be at least 1500°F or the temperature approved by the Division based upon the most recent destruction efficiency test (whichever is higher).  
[391-3-1-.03(2)(c)]
- 3.2.4 The 3-hour rolling combustion temperature of the RCO shall be at least 800°F or the temperature approved by the Division based upon the most recent destruction efficiency test (whichever is higher).  
[391-3-1-.03(2)(c)]

### 3.3 Equipment Federal Rule Standards

Not applicable.

### 3.4 Equipment SIP Rule Standards

- 3.4.1 The Permittee shall not cause, let, suffer, permit or allow emissions from any stack, including the Furnace/Dryer RTO stack (S1) or the Dry Hammermill/Press/Cooler RCO stack (S2) the opacity of which is equal to or greater than forty percent.  
[391-3-1-.02(2)(b)1.]
- 3.4.2 The Permittee shall not cause, let, permit, suffer or allow the rate of emissions from the Furnace/Dryer RTO stack (S1) or the Dry Hammermill/Press/Cooler RCO stack (S2) Particulate Matter (PM) in total quantities equal to or exceeding the allowable rate, calculated as follows:  
[391-3-1-.02(2)(e)]

$E = 4.1P^{0.67}$ ; for process input weight rate up to and including 30 tons per hour, or  
 $E = 55P^{0.11} - 40$ ; for process input weight above 30 tons per hour

Where:

E = emission rate in pounds per hour

P = process input weight rate in tons per hour

- 3.4.3 The Permittee shall take all reasonable precautions to prevent dust from any operation, process, handling, transportation or storage facility from becoming airborne. Reasonable precautions that could be taken to prevent dust from becoming airborne include, but are not limited to, the following:  
[391-3-1-.02(2)(n)]
- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
  - b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;
  - c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
  - d. Covering, at all times when in motion, open bodied trucks that are transporting materials likely to give rise to airborne dusts; and
  - e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.
- 3.4.4 The opacity from any fugitive dust source shall not equal or exceed 20 percent.  
[391-3-1-.02(2)(n)]
- 3.4.5 The Permittee shall not burn fuel containing more than 3 percent sulfur by weight in the Furnace (FUR), the Furnace/Dryer RTO, or the Dry Hammermill/Press/Cooler RCO. The Permittee shall comply with this rule by only burning wood or natural gas.  
[391-3-1-.02(2)(g)]

**3.5 Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit**

- 3.5.1 Routine maintenance shall be performed on all air pollution control equipment. Maintenance records shall be in a form suitable for inspection or submittal to the Division and shall be maintained for a period of five (5) years from date of entry.  
[391-3-1-.02(6)(b)1(i)]
- 3.5.2 The Permittee shall maintain an inventory of baghouse filter bags such that an adequate supply of bags is on hand to replace any defective ones.  
[391-3-1-.02(6)(b)1(i)]

**PART 4.0 REQUIREMENTS FOR TESTING****4.1 General Testing Requirements**

- 4.1.1 The Permittee shall cause to be conducted a performance test at any specified emission unit when so directed by the Environmental Protection Division (“Division”). The test results shall be submitted to the Division within 60 days of the completion of the testing. Any tests shall be performed and conducted using methods and procedures that have been previously specified or approved by the Division.  
[391-3-1-.02(6)(b)1(i)]
- 4.1.2 The Permittee shall provide the Division thirty (30) days (or sixty (60) days for tests required by 40 CFR Part 63) prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.  
[391-3-1-.02(3)(a) and 40 CFR 63.7(b)(1)]
- 4.1.3 Performance and compliance tests shall be conducted, and data reduced in accordance with applicable procedures and methods specified in the Division’s Procedures for Testing and Monitoring Sources of Air Pollutants. The methods for the determination of compliance with emission limits listed under Sections 3.2, 3.3, 3.4 and 3.5 are as follows:
- a. Method 1 shall be used for the determination of sample point locations.
  - b. Method 2 shall be used for the determination of stack gas flow rate.
  - c. Method 3 or 3A shall be used for the determination of stack gas molecular weight. Method 3B shall be used for the determination of emission rate correction factor or excess air. Method 3A may be used as an alternative.
  - d. Method 4 shall be used for the determination of stack gas moisture.
  - e. Method 5/Method 202 shall be used for determination of total PM emissions, to include condensable particulates + filterable particulates for Rule (e).
  - f. Method 7 or 7E shall be used for determination of NO<sub>x</sub> emissions.
  - g. Method 9 and the procedures of the above referenced document shall be used to determine the opacity.
  - h. Method 10 shall be used for the determination of CO concentrations.
  - i. Method 19 shall be used when applicable; to convert particulate matter, carbon monoxide, and nitrogen oxides concentrations (i.e., grains/dscf for PM, ppm for gaseous pollutants), as determined using other methods specified in this section, to mass emission rates (i.e., lb/MM Btu, lb/hr).



- j. Method 26 or 26A shall be used to determine Hydrogen Chloride emission concentrations.
- k. Method 25A shall be used for the determination of VOC concentrations in the dryer exhaust stacks.
- l. NCASI 105.1 shall be used for the determination of methanol, formaldehyde and acetaldehyde concentrations.
- m. Modified EPA OTM-26 Interim VOC Measurement Protocol for the Wood Products Industry (July 2007) or (WPP1) shall be used for the calculation and summation of VOC emissions.

Minor changes in methodology may be specified or approved by the Director or his designee when necessitated by process variables, changes in facility design, or improvement or corrections that, in his opinion, render those methods or procedures, or portions thereof, more reliable.

[391-3-1-.02(3)(a)]

- 4.1.4 The Permittee shall submit performance test results to the US EPA's Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI) in accordance with any applicable NSPS or NESHAP standards (40 CFR 60 or 40 CFR 63) that contain electronic data reporting requirements. This Condition is only applicable if required by an applicable standard and for the pollutant(s) subject to said standard.  
[391-3-1-.02(8)(a) and 391-3-1-.02(9)(a)]

## **4.2 Specific Testing Requirements**

- 4.2.1 Within 120 days after initial startup, the Permittee shall conduct performance tests for the following pollutants on the Furnace/Dryer RTO stack (S1):
  - a. Total particulate matter (PM) emissions including condensable and filterable PM
  - b. NO<sub>x</sub>
  - c. CO
  - d. VOC
  - e. Formaldehyde
  - f. Methanol
  - g. Acetaldehyde

Subsequent testing shall be conducted at least once every 36 months. The performance tests for NO<sub>x</sub> and CO, and the tests for VOC and organic HAP must be conducted simultaneously each time a test is required for one of these pollutants.

During the performance tests the Permittee shall continuously measure and record the combustion zone temperature for the RTO and the total power in the WESP. These measurements shall be submitted along with the test reports. During the performance testing, the Permittee shall record and submit the amount of product dried (in both actual and bone-dry tonnages per hour) in the dryer. The tests shall be conducted at the maximum anticipated drying rate.

[391-3-1-.02(3)(a)]

4.2.2 Within 120 days after initial startup, the Permittee shall conduct performance tests for the following pollutants on the Dry Hammermill/Press/Cooler RCO stack (S2):

- a. Total particulate matter (PM) emissions including condensable and filterable PM
- b. NOx
- c. CO
- d. VOC
- e. Formaldehyde
- f. Methanol
- g. Acetaldehyde

Subsequent testing shall be conducted at least once every 36 months. The performance tests for NOx and CO, and the tests for VOC and organic HAP must be conducted simultaneously each time a test is required for one of these pollutants. During the performance tests the Permittee shall continuously measure and record the combustion zone temperature for RCO. These measurements shall be submitted along with the test reports. During the performance testing, the Permittee shall record the amount of pellets produced (in both actual and bone-dry tonnages per hour). The tests shall be conducted at the maximum anticipated operating rate.

[391-3-1-.02(3)(a)]

4.2.3 Within 120 days after initial startup, the Permittee shall conduct performance tests for VOC on a silo in the equipment group HAND. During the performance testing, the Permittee shall record the amount of pellets produced. The emission factor shall be based on the results of the test from one silo and the facility production divided by 4 (four silos). The tests shall be conducted on a silo that is loaded at a minimum of 25% of the total HAND throughput.

[391-3-1-.02(3)(a)]

4.2.4 If the results of a PM, VOC, HAP, CO or NOx performance test required in this Section 4 exceed the factor currently being used in Section 6, then the Permittee must calculate emissions using the new, higher factor starting on the test date. The Permittee shall also submit a permit application within 180 days after testing, either requesting the higher emission factor or demonstrating that the emission factor derived is not representative of normal emissions.

[391-3-1-.02(6)(b)1(i)]

## Title V Permit Amendment

Hazlehurst Wood Pellets, LLC

Permit No.: 2499-161-0023-V-02-4

---

- 4.2.5 The Permittee shall not use monitors or test equipment during performance tests that are not used in normal day to day operations of the facility, to adjust/fine tune the burners prior to performance testing. The Permittee shall submit all test data for pre-tests and post-tests conducted before and following the test along with the source test data to the Division upon request.

[391-3-1-.02(3) and 391-3-1-.03(2)(c)]

**PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)****5.1 General Monitoring Requirements**

- 5.1.1 Any continuous monitoring system required by the Division and installed by the Permittee shall be in continuous operation and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Monitoring system response, relating only to calibration checks and zero and span adjustments, shall be measured and recorded during such periods. Maintenance or repair shall be conducted in the most expedient manner to minimize the period during which the system is out of service.  
[391-3-1-.02(6)(b)1]

**5.2 Specific Monitoring Requirements**

- 5.2.1 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated parameters on the following equipment. Each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.  
[391-3-1-.02(6)(b)1]
- The combustion temperature of RTO and RCO. The temperature monitoring device shall have an accuracy of  $\pm 2\%$  ( $^{\circ}\text{F}$ ).
  - The secondary voltage for each field of the WESP. Such devices shall have a required accuracy of  $\pm 2\%$ .
  - The secondary current for each field of the WESP. Such devices shall have a required accuracy of  $\pm 2\%$ .
- 5.2.2 The Permittee shall, using the data required to be recorded by Condition 5.2.1, determine the total power for each hour of operation. Total WESP power shall be calculated using the following equation:  
[391-3-1-.02(6)(b)1]

$$P_t = \sum_{i=1}^n V_i I_i$$

Where:

$P_t$  = Total Wet ESP power (watts)

$V_i$  = secondary voltage (kV) in wet ESP field i

$I_i$  = secondary current (ma) in ESP field i

n = Total number of fields in ESP

i = ith field in ESP (i = 1 to n)

- 5.2.3 The Permittee shall install, calibrate, maintain, and operate pressure drop indicators on the Dry Hammermill cyclofilters (CYFL1-7) and the Press/Cooler baghouses (BH1, BH2, and BH3). Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements. The Permittee shall read and record the pressure drop at least once per day of operation. A logbook containing these records shall be available for inspection and/or submittal to the Division, upon request. [391-3-1-.02(6)(b)1]
- 5.2.4 The Permittee shall implement a Preventive Maintenance Program (PMP) for the Dry Hammermill cyclofilters (CYFL1-7) and the Press/Cooler baghouses (BH1, 2, and 3). The program shall be subject to review and if necessary, to assure compliance, modification by the Division and shall include the pressure drop ranges that indicate proper operation for each baghouse. At a minimum, the following operation and maintenance checks shall be made on at least a weekly basis and a record of the findings and corrective actions taken shall be kept in a maintenance log:  
[391-3-1-.02(6)(b)1]
- a. For baghouses equipped with compressed air cleaning systems, check the system for proper operation. This may include checking for low pressure, leaks, proper lubrication and proper operation of timer and valves.
  - b. For baghouses equipped with reverse air cleaning systems, check the system for proper operation. This may include checking damper, bypass and isolation valves for proper operation.
  - c. For baghouses equipped with shaker cleaning systems, check the system for proper operation. This may include checking shaker mechanism for loose or worn bearings, drive components, mounting; proper operation of outlet/isolation valves; proper lubrication.
  - d. Check dust collector hoppers and conveying systems for proper operation.
  - e. Check the cyclone filters for clogging and air leaks
- 5.2.5 The Permittee shall calculate three-hour average WESP secondary power using data measured per Condition 5.2.2.  
[391-3-1-.02(6)(b)1]
- 5.2.6 The Permittee shall ensure that temperatures in the RTO and RCO combustion zones are maintained at or above the levels required by Conditions 3.2.3 and 3.2.4 on a 3-hour rolling average using a temperature sensor. The Permittee shall calculate the rolling three-hour average combustion temperature using data measured per Condition 5.2.1.  
[391-3-1-.02(6)(b)1]

- 5.2.7 The Permittee shall conduct daily inspections of all sources of fugitive dust emissions, including but not limited to the units listed in Table 3.1 of this permit as subject to Georgia Rule 391-3-1-.02(2)(n). Records of each daily inspection shall be maintained and available for inspection or submittal to the Division upon request. The inspection shall include, at a minimum:  
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- Check of the working condition of dust control measures such as loadout boots.
  - Verify that baghouses, filters and cyclones used to minimize fugitive dust are operating
  - Documentation of any visible emissions present from any fugitive dust source, including but not limited to the green hammermills (GHM1&2), and the wood piles. Any adverse condition discovered by this inspection shall be corrected in the most expedient manner possible. The Permittee shall record the incident as an excursion and note the corrective action taken.
- 5.2.8 The Permittee shall perform daily checks of visible emissions from Log Storage/Handling, Debarking/Screening, Chipper, and Chip Piles (WOOD); Green Hammermills (GHM1&2); Furnace/Dryer RTO stack (S1), and the Dry Hammermill/Press/Cooler RCO stack (S2) while the underlying process equipment is operating at the normal, expected operating rate using the procedures below, except when atmospheric conditions or sun positioning prevent any opportunity to perform a VE check. The Permittee shall retain a record in a daily visible emissions (VE) log suitable for inspection or submittal.  
[391-3-1-.02(6)(b)1]
- Determine, in accordance with the procedures specified in paragraph d of this condition, if visible emissions are present at the discharge point to the atmosphere and record the results in the daily VE log. For sources that exhibit visible emissions, the Permittee shall comply with paragraph b of this condition.
  - For each check where a stack is determined to be emitting visible emissions, a qualified observer shall determine whether the emissions equal or exceed a 20% opacity action level, using the procedure specified in paragraph d of this condition. For the purposes of this condition a qualified observer is one that has met the certification requirements of EPA Method 9 – *Visual Determination of the Opacity of Emissions from Stationary Sources*. Also, this determination shall cover a period of six minutes. The results shall be recorded in the daily VE log. For sources that exhibit visible emissions of greater than or equal to the opacity action level of 20%, the Permittee shall comply with paragraph c of this condition.
  - For each occurrence that requires action in accordance with paragraph b of this condition, the Permittee shall determine the cause of the visible emissions and correct the problem in the most expedient manner possible. The Permittee shall note the cause of the visible emissions, raw material feed rate, and any other pertinent operating parameters as well as the corrective action taken, in the maintenance log.
  - The person performing the determination shall stand at a distance of at least three stack heights, which is sufficient to provide a clear view of the plume against a contrasting background with the sun in the 140 degree sector at his/her back.

Consistent with this requirement, the determination shall be made from a position such that the line of vision is approximately perpendicular to the plume direction. Only one plume shall be in the line of sight at any time when multiple stacks are in proximity to each other.

- 5.2.9 The Permittee shall install, calibrate, maintain, and operate systems to monitor the dried wood rate (ODT/hr) exiting the dryer (DRY), and the pellet production rate (ton/hr) through the Coolers (COOL1-3). The data shall be recorded hourly. Performance specification(s) of the Division's monitoring requirements.  
[391-3-1-.02(6)(b)1]
- 5.2.10 The Permittee shall develop and implement a Preventive Maintenance Program for the catalytic oxidizer (RCO) to assure that the provisions of Condition 1.1 are met. The program shall be subject to review and, if necessary to assure compliance, modification by the Division. At a minimum, the following operation and maintenance checks shall be made on at least an annual basis, and a record of the findings and corrective actions taken shall be kept in a maintenance log:  
[391-3-1-.02(6)(b)1]
- a. Clean burner
  - b. Tighten burner valve linkage
  - c. Visually inspect catalyst bed for plugging. Catalyst bed should be free of particulate matter.
  - d. Visually inspect the inlet and outlet thermocouples, have thermocouples calibrated for proper operation
  - e. Visually inspect the inlet and outlet pressure sensors, have sensors calibrated for proper operation
  - f. Visually inspect crossflow for plugging on burner side. If crossflow is dirty remove and clean with hose and water
  - g. Visually inspect chamber for cracks
  - h. Visually inspect process fan rotor for warpage, cracking, abnormal noise, and free spin
  - i. Rotate the catalyst media annually according to the manufacturer's recommendations
- 5.2.11 The Permittee shall prepare a core sampling plan for the catalytic oxidizer (RCO) per manufacturer's recommendation and submit to the Division thirty (30) days in advance of conducting any core sampling activity required by Condition 5.2.12.
- The following information shall be included in the required core sampling plan:  
[391-3-1-.02(6)(b)1, and 40 CFR 70.6(a)(3)(i)]
- a. Location of samples taken.

## Title V Permit Amendment

b. Size of samples taken.

c. Number of samples taken.

5.2.12 The Permittee shall take a core sample of the catalyst bed at approximately one year intervals not to exceed fourteen months between tests per the plan submitted in Condition 5.2.11 and test core sample for catalyst activity. The first such sampling shall occur at 12 months from the from the last performance test.

[391-3-1-.02(6)(b)1, and 40 CFR 70.6(a)(3)(i)]

5.2.13 The Permittee shall replace or clean the catalyst per manufacturer's recommendation if the core sample tested per Condition 5.2.12 shows a catalyst removal efficiency of less than 90 percent. This cleaning and/or replacement shall be done no later than thirty (30) days of the facility receiving the test results.

[391-3-1-.02(6)(b)1, and 40 CFR 70.6(a)(3)(i)]

5.2.14 The following pollutant specific emission unit(s) (PSEU) are subject to the Compliance Assurance Monitoring (CAM) Rule in 40 CFR 64.

| Emission Unit                   | Pollutant  |
|---------------------------------|------------|
| Furnace/Dryer (WESP/RTO)        | PM and VOC |
| Dry Hammermills (CYFL1-7/RCO)   | PM and VOC |
| Presses and Coolers (BH1-3/RCO) | PM and VOC |

Permit conditions in this permit for the PSEU(s) listed above with regulatory citation 40 CFR 70.6(a)(3)(i) are included for the purpose of complying with 40 CFR 64. In addition, the Permittee shall meet the requirements, as applicable, of 40 CFR 64.7, 64.8, and 64.9. [40 CFR 64]

5.2.15 The Permittee shall comply with the performance criteria listed in the table below for the PM emissions from Furnace/Dryer.

[40 CFR 64.6(c)(1)(iii)]

| Performance Criteria [64.4(a)(3)]  | Indicator No. 1<br>WESP Secondary Power                                                                                                    | Indicator No. 2<br>Water Flow to WESP |
|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| A. Representativeness [64.3(b)(1)] | Total power greater than or equal to 80% of the power during the most recent filterable PM performance test for three consecutive readings | Per test                              |
| B. Verification [64.3(b)(2)]       | N/A                                                                                                                                        | N/A                                   |
| C. QA/QC Criteria [64.3(b)(3)]     | Routine maintenance and annual calibration checks                                                                                          | N/A                                   |



## Title V Permit Amendment

Hazlehurst Wood Pellets, LLC

Permit No.: 2499-161-0023-V-02-4

|                                  |             |             |
|----------------------------------|-------------|-------------|
| D. Frequency [64.3(b)(4)]        | Continuous  | Continuous  |
| E. Data Collection [64.3(b)(4)]  | Data Logger | Data Logger |
| F. Averaging Period [64.3(b)(4)] | 3 hours     | 3 hours     |

- 5.2.16 The Permittee shall comply with the performance criteria listed in the table below for the PM emissions from the Dry Hammermills, Presses, and Coolers.  
[40 CFR 64.6(c)(1)(iii)]

| Performance Criteria [64.4(a)(3)]  | Indicator No. 1<br>Visible Emission                             | Indicator No. 2<br>Pressure Drop                                         |
|------------------------------------|-----------------------------------------------------------------|--------------------------------------------------------------------------|
| A. Representativeness [64.3(b)(1)] | Daily VE check - Action Level<br>20% or more opacity of Visible | 1" to 10" W.C.(for BH1,2,3)                                              |
| B. Verification [64.3(b)(2)]       | N/A                                                             | N/A                                                                      |
| C. QA/QC Criteria [64.3(b)(3)]     | N/A                                                             | Pressure gauges are calibrated and<br>maintained per manufacturer specs. |
| D. Frequency [64.3(b)(4)]          | Daily                                                           | Daily                                                                    |
| E. Data Collection [64.3(b)(4)]    | VE log                                                          | Pressure drops are recorded<br>electronically by a Data logger           |
| F. Averaging Period [64.3(b)(4)]   | 6 minutes                                                       | N/A                                                                      |

- 5.2.17 The Permittee shall comply with the performance criteria listed in the table below for the VOC emissions from Furnace/Dryer, Dry Hammermills, Presses, and Coolers.  
[40 CFR 64.6(c)(1)(iii)]

| Performance Criteria<br>[64.4(a)(3)] | Indicator No. 1<br>RTO and RCO Combustion<br>temperatures                                                                                                      |
|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| A. Representativeness [64.3(b)(1)]   | Thermocouples measure combustion zone<br>temperature; not less than 1500 and 800F.                                                                             |
| B. Verification [64.3(b)(2)]         | n/a                                                                                                                                                            |
| C. QA/QC Criteria [64.3(b)(3)]       | Temperature ranges and minimum<br>temperature are established during<br>performance testing. Thermocouples<br>replaced per manufacturer suggested<br>intervals |
| D. Frequency [64.3(b)(4)]            | Continuous                                                                                                                                                     |
| E. Data Collection [64.3(b)(4)]      | Temperature are recorded electronically<br>using a data logger                                                                                                 |
| F. Averaging Period [64.3(b)(4)]     | 3 hour average                                                                                                                                                 |

**PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS****6.1 General Record Keeping and Reporting Requirements**

- 6.1.1 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and to the EPA. The records shall be retained for at least five (5) years following the date of entry. [391-3-1-.02(6)(b)1(i) and 40 CFR 70.6(a)(3)]
- 6.1.2 In addition to any other reporting requirements of this Permit, the Permittee shall report to the Division in writing, within seven (7) days, any deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning, or emissions control equipment for a period of four hours or more which results in excessive emissions. The Permittee shall submit a written report that shall contain the probable cause of the deviation(s), duration of the deviation(s), and any corrective actions or preventive measures taken. [391-3-1-.02(6)(b)1(iv), 391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(3)(iii)(B)]
- 6.1.3 The Permittee shall submit written reports of any failure to meet an applicable emission limitation or standard contained in this permit and/or any failure to comply with or complete a work practice standard or requirement contained in this permit which are not otherwise reported in accordance with Conditions 6.1.4 or 6.1.2. Such failures shall be determined through observation, data from any monitoring protocol, or by any other monitoring which is required by this permit. The reports shall cover each semiannual period ending June 30 and December 31 of each year, shall be postmarked by August 29 and February 28, respectively following each reporting period, and shall contain the probable cause of the failure(s), duration of the failure(s), and any corrective actions or preventive measures taken. [391-3-1-.03(10)(d)1.(i) and 40 CFR 70.6(a)(3)(iii)(B)]
- 6.1.4 The Permittee shall submit a written report containing any excess emissions, exceedances, and/or excursions as described in this permit and any monitor malfunctions for each semiannual period ending June 30 and December 31 of each year. All reports shall be postmarked by August 29 and February 28, respectively following each reporting period. In the event that there have not been any excess emissions, exceedances, excursions or malfunctions during a reporting period, the report should so state. Otherwise, the contents of each report shall be as specified by the Division's Procedures for Testing and Monitoring Sources of Air Pollutants and shall contain the following:  
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(iii)(A)]
- a. A summary report of excess emissions, exceedances and excursions, and monitor downtime, in accordance with Section 1.5(c) and (d) of the above referenced document, including any failure to follow required work practice procedures.
  - b. Total process operating time during each reporting period.
  - c. The magnitude of all excess emissions, exceedances and excursions computed in accordance with the applicable definitions as determined by the Director, and any

conversion factors used, and the date and time of the commencement and completion of each time period of occurrence.

- d. Specific identification of each period of such excess emissions, exceedances, and excursions that occur during startups, shutdowns, or malfunctions of the affected facility. Include the nature and cause of any malfunction (if known), the corrective action taken, or preventive measures adopted.
- e. The date and time identifying each period during which any required monitoring system or device was inoperative (including periods of malfunction) except for zero and span checks, and the nature of the repairs, adjustments, or replacement. When the monitoring system or device has not been inoperative, repaired, or adjusted, such information shall be stated in the report.
- f. Certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

6.1.5 Where applicable, the Permittee shall keep the following records:  
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(3)(ii)(A)]

- a. The date, place, and time of sampling or measurement;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of such analyses; and
- f. The operating conditions as existing at the time of sampling or measurement.

6.1.6 The Permittee shall maintain files of all required measurements, including continuous monitoring systems, monitoring devices, and performance testing measurements; all continuous monitoring system or monitoring device calibration checks; and adjustments and maintenance performed on these systems or devices. These files shall be kept in a permanent form suitable for inspection and shall be maintained for a period of at least five (5) years following the date of such measurements, reports, maintenance and records.  
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6 (a)(3)(ii)(B)]

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)

None required to be reported in accordance with Condition 6.1.4.

- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)

- i. Any consecutive twelve month total PM, CO, NO<sub>x</sub> or VOC emissions from the entire facility equal to or exceeding of 249 tons.
- ii. Any consecutive twelve month total of any single hazardous air pollutant (HAP) or two or more HAPs emissions from the facility equal to or exceeding 10 tons or 25 tons respectively.
- iii. Any consecutive twelve month total dryer production that exceeds 675,000 ODT. ODT = weight of wood in tons at 11% moisture, calculated.

- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)

- i. Any instance in which VE exceed the 20% action level (monitored in accordance with Condition 5.2.4) for two or more consecutive days.
- ii. Any three-hour average combustion temperature of the RTO or RCO measured and recorded per Condition 5.2.1 below 1,500°F (for RTO) or 800°F (for RCO) or the combustion temperature established during the most recent Division-approved performance test if used to establish Destruction efficiency.
- iii. Any three-hour period during which the average total power for the WESP is less than 80 percent of the value determined during the most recent performance test for PM.
- iv. Any adverse condition regarding fugitive dust emissions as required per Condition 3.4.3.

- v. Any failure to perform the daily inspections of all sources of fugitive dust emissions (monitored in accordance with Condition 5.2.6).
- vi. Any instance in which a Dry Hammermill cyclofilter (CYFL1-7) or a Press/Cooler baghouse (BH1, BH2, and BH3) pressure drop reading (monitored in accordance with Condition 5.2.3) is outside of normal ranges for two or more consecutive days.
- vii. Any time period that the annual catalyst bed core sampling was not performed as required by Condition 5.2.11.
- viii. Any time period that the catalyst was not cleaned or replaced as required by Condition 5.2.12.

## 6.2 Specific Record Keeping and Reporting Requirements

- 6.2.1 The Permittee shall keep operating records to determine the total amount of wood dried in the Dryer (DRY), in ODT on a monthly basis. ODT = weight of wood in tons at 11% moisture, calculated. The Permittee shall also keep operating records to determine the total amount of pellets processed through the Coolers (COOL1-3) in actual tons.  
[Avoidance of 40 CFR 52.21]
- 6.2.2 The Permittee shall submit, with the report required by Condition 6.1.4, a semiannual report that contains the following records. The records shall be available for inspection or submittal to the Division upon request and contain:  
[391-3-1-.02(6)(b)1, and 40 CFR 70.6(a)(3)(i)]
- a. The total quantity of wood dried (in ODT) in the dryer (DRY) during each calendar month in the semiannual reporting period.
  - b. The total quantity of pellets produced (in actual tons) through the Coolers (COOL1-3) for the 12 consecutive month period ending with each calendar month in the semiannual reporting period.
- 6.2.3 The Permittee shall calculate the monthly NO<sub>x</sub> and CO emissions from the facility (consisting of the RTO and RCO exhaust) using the records from Condition 6.2.1 and the following equations. All emission factors and calculations shall be kept as part of the monthly records, available for inspection or submittal.  
[391-3-1-.02(6)(b)1, and 40 CFR 70.6(a)(3)(i)]

$$E_{NOX} = [(EF1_{NOX} \times DRY) + (EF2_{NOX} \times COOL)]/2000$$

$$E_{CO} = [(EF1_{CO} \times DRY) + (EF2_{CO} \times COOL)]/2000$$

Where:

## Title V Permit Amendment

|             |   |                                                             |
|-------------|---|-------------------------------------------------------------|
| $E_{NOX}$   | = | Monthly NO <sub>x</sub> emission in tons                    |
| $E_{CO}$    | = | Monthly CO emission in tons                                 |
| $EF_{1NOX}$ | = | Emission Factor (lb NO <sub>x</sub> /ODT) from the RTO (S1) |
| $EF_{1CO}$  | = | Emission Factor (lb CO/ODT) from the RTO (S1)               |
| DRY         | = | Monthly wood production through DRY (ODT)                   |
| $EF_{2NOX}$ | = | Emission Factor (lb NO <sub>x</sub> /ton) from the RCO (S2) |
| $EF_{2CO}$  | = | Emission Factor (lb CO/ton) from the RCO (S2)               |
| COOL        | = | Monthly pellet production through COOL1-3 (tons)            |

The Permittee shall calculate NO<sub>x</sub> and CO emissions by using the following emission factors and the equation provided in this condition. If the emissions testing required in Section 4 reveals emission factors higher than these listed below, the Permittee shall comply with Condition 4.2.4

| Emission Point | NO <sub>x</sub>                   | CO                               |
|----------------|-----------------------------------|----------------------------------|
| RTO (S1)       | $EF_{1NOX} = 0.66 \text{ lb/ODT}$ | $EF_{1CO} = 0.66 \text{ lb/ODT}$ |
| RCO (S2)       | $EF_{2NOX} = 0.06 \text{ lb/ton}$ | $EF_{2CO} = 0.06 \text{ lb/ton}$ |

ODT = weight of wood in tons at 11% moisture, calculated. The Permittee shall notify the Division in writing if facility-wide NO<sub>x</sub> or CO emissions exceed 20.7 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month.

- 6.2.4 The Permittee shall calculate the monthly total PM emissions from the facility (consisting of RTO, RCO, and HAND) using the records from Condition 6.2.1 and the following equations. All emission factors and calculations shall be kept as part of the monthly records, available for inspection or submittal.  
[391-3-1-.02(6)(b)1, and 40 CFR 70.6(a)(3)(i)]

$$EPM = [(EF_{1PM} \times DRY) + (EF_{2PM} \times COOL) + SILO]/2000$$

Where:

|            |   |                                                          |
|------------|---|----------------------------------------------------------|
| $E_{PM}$   | = | Monthly total PM emission in tons                        |
| $EF_{1PM}$ | = | Emission Factor (lb PM/ODT) from the RTO (S1)            |
| $EF_{2PM}$ | = | Emission Factor (lb PM/ton) from the RCO (S2)            |
| DRY        | = | Monthly wood production through DRY (ODT)                |
| COOL       | = | Monthly pellet production through COOL1-3 (tons)         |
| SILO       | = | Monthly potential PM emissions from silos = 3,000 pounds |

The Permittee shall calculate PM emissions by using the following emission factors and the equation provided in this condition. If the emissions testing required in Section 4 reveals emission factors higher than these listed below, the Permittee shall comply with Condition 4.2.4

| Emission Point | PM                               |
|----------------|----------------------------------|
| RTO (S1)       | $EF_{1PM} = 0.30 \text{ lb/ODT}$ |

## Title V Permit Amendment

|          |                                 |
|----------|---------------------------------|
| RCO (S2) | EF2 <sub>PM</sub> = 0.31 lb/ton |
|----------|---------------------------------|

ODT = weight of wood in tons at 11% moisture, calculated. The Permittee shall notify the Division in writing if facility-wide total PM emissions exceed 20.7 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month.

- 6.2.5 The Permittee shall calculate the monthly VOC, Formaldehyde, Acetaldehyde, Methanol, and other HAP emissions using the records from Condition 4.2.3 and the following equation(s). All emission factors and calculations shall be kept as part of the monthly records, readily available for inspection or submittal. VOC emissions shall be calculated using EPA OTM-26:  $VOC = [\text{Method 25A VOC as propane} + \text{Methanol as methanol} + \text{Formaldehyde as formaldehyde} + \text{Acetaldehyde as acetaldehyde}] - [(0.65) \text{Methanol expressed as propane}]$   
[391-3-1-.02(6)(b)1, and 40 CFR 70.6(a)(3)(i)]

For each pollutant per month using the following equation.

$$E_i = [(EF1_i \times \text{DRY}) + (EF2_i \times \text{COOL}) + (EF3_i \times \text{SILO})]/2000$$

Where:

|                  |   |                                                          |
|------------------|---|----------------------------------------------------------|
| E <sub>i</sub>   | = | Monthly emission in tons of pollutant                    |
| i                | = | VOC, Formaldehyde, Acetaldehyde, Methanol, and other HAP |
| EF1 <sub>i</sub> | = | RTO emission factor (lb/ODT) for each pollutant          |
| DRY              | = | Monthly wood production through DRY (ODT)                |
| EF2 <sub>i</sub> | = | RCO Emission Factor (lb/ton) for each pollutant          |
| COOL             | = | Monthly pellet production through COOL1-3 (tons)         |
| EF3 <sub>i</sub> | = | Silo emission factor (lb/ton) for each pollutant         |
| SILO             | = | Monthly pellet production through SILOS (tons)           |

| Emission Point              | VOC         | Methanol      | Formaldehyde | Acetaldehyde  | Other HAP   |
|-----------------------------|-------------|---------------|--------------|---------------|-------------|
| EF1 <sub>i</sub> (RTO) (S1) | 0.30 lb/ODT | 0.006 lb/ODT  | 0.007 lb/ODT | 0.006 lb/ODT  | 0.01 lb/ODT |
| EF2 <sub>i</sub> (RCO) (S2) | 0.19 lb/ton | 0.0005 lb/ton | 0.001 lb/ton | 0.0005 lb/ton | -           |
| EF3 <sub>i</sub> (SILOS)    | 0.20 lb/ton | 0.001 lb/ton  | 0.002 lb/ton | 0.001 lb/ton  | -           |

VOC and HAP emission factors are EPD emission factors reduced by an estimated 95% reduction from the RTOs.

ODT = weight of wood in tons at 11% moisture, calculated.

The Dryer (DRY) VOC and HAP emission factors (EF1<sub>i</sub>) shall be multiplied by 20 any time the three (3) hour average RTO combustion temperature falls below 1500 °F or the target set in the most recent performance test. The hammermill/press/cooler VOC and HAP emission factors shall be multiplied by 20 any time the three (3) hour average RCO combustion temperature falls below 800 °F or the target set in the most recent performance test.

## Title V Permit Amendment

The Permittee shall notify the Division in writing if facility-wide total VOC emissions exceed 20.7 tons during any calendar month, if any facility-wide individual HAP emissions exceed 0.83 tons during any calendar month, or if any facility-wide combined HAP emissions exceed 2.08 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month.

- 6.2.6 The Permittee shall use the monthly NO<sub>x</sub>, CO, total VOC, formaldehyde, methanol, and acetaldehyde emission data to calculate the 12-month rolling total of each pollutant emissions for each calendar month in the reporting period. These records shall be kept available for inspection or submittal.

[391-3-1-.03(2)(c)]

- 6.2.7 The Permittee shall notify the Division in writing within 15 days after startup of the new Dryer (DRY).

[391-3-1-.03(2)(c)]



# Rate and Peak Concentrations of Off-Gas Emissions in Stored Wood Pellets—Sensitivities to Temperature, Relative Humidity, and Headspace Volume

XINGYA KUANG<sup>1,2</sup>, TUMULURU JAYA SHANKAR<sup>1</sup>, XIAOTAO T. BI<sup>1</sup>,  
C. JIM LIM<sup>1</sup>, SHAHAB SOKHANSANJ<sup>1,3\*</sup> and STAFFAN MELIN<sup>1,4</sup>

<sup>1</sup>Department of Chemical and Biological Engineering, University of British Columbia, 2360 East Mall, Vancouver, British Columbia V6T 1Z3, Canada; <sup>2</sup>Department of Occupational Medicine, Yangpu District Central Hospital, Shanghai 200090, China; <sup>3</sup>Bioenergy Resources and Engineering Systems Group, Environmental Sciences Division, Oak Ridge National Laboratory, Oak Ridge, TN 37831, USA; <sup>4</sup>Delta Research Corporation, 501 Centennial Parkway, Delta, British Columbia V4L 2L5, Canada

Received 17 February 2009; in final form 31 May 2009; published online 5 August 2009

Wood pellets emit CO, CO<sub>2</sub>, CH<sub>4</sub>, and other volatiles during storage. Increased concentration of these gases in a sealed storage causes depletion of concentration of oxygen. The storage environment becomes toxic to those who operate in and around these storages. The objective of this study was to investigate the effects of temperature, moisture, and the relative size of storage headspace on emissions from wood pellets in an enclosed space. Twelve 10-l plastic containers were used to study the effects of headspace ratio (25, 50, and 75% of container volume) and temperatures (10–50°C). Another eight containers were set in uncontrolled storage relative humidity (RH) and temperature. Concentrations of CO<sub>2</sub>, CO, and CH<sub>4</sub> were measured by gas chromatography (GC). The results showed that emissions of CO<sub>2</sub>, CO, and CH<sub>4</sub> from stored wood pellets are more sensitive to storage temperature than to RH and the relative volume of headspace. Higher peak emission factors are associated with higher temperatures. Increased headspace volume ratio increases peak off-gas emissions because of the availability of oxygen associated with pellet decomposition. Increased RH in the enclosed container increases the rate of off-gas emissions of CO<sub>2</sub>, CO, and CH<sub>4</sub> and oxygen depletion.

**Keywords:** biomass; emission factors; headspace ratio; moisture effect; off-gassing emission; storage; temperature effect; wood pellets

## INTRODUCTION

Wood pellets are used for heat and electricity production. More than 800 000 tonnes of wood pellets were exported from Canada to Europe in 2008, mainly from British Columbia. The reaction mechanisms for biomass combustion and emissions from wood pellet combustion have been extensively investigated (Chen and Workman, 1990; Dinu, 2006; Wadso, 2007). Recently, more attention has been given to the emissions from wood pellets during their storage and transportation because these emissions can become a potential health risk (Svedberg *et al.*, 2008).

It is well known that a biomass gradually decomposes chemically and biologically and during these

processes it slowly releases toxic gases, leading to depleting oxygen (Reuss and Pratt, 2000; Johansson *et al.*, 2004; Arshadi and Gref, 2005). Svedberg *et al.* (2004) has reported the composition of the off-gas emissions from stored wood pellets, with CO, CO<sub>2</sub>, CH<sub>4</sub>, and non-methane organic compounds being commonly identified in the off-gases from biomass (Johansson *et al.*, 2004). Kuang *et al.* (2008) developed a kinetic model of off-gas emissions from wood pellets in sealed containers to predict the evolution of emission rate factors at different storage temperatures. Many factors may contribute to the buildup of gas pollutants emitted from wood pellets in storage. Pellets made from aged sawdust might generate less volatile organic compounds (VOCs) than pellets made from fresh sawdust. The level of off-gas emissions was also found to depend on wood species. Pellets made from spruce sawdust emitted less VOCs

\*Author to whom correspondence should be addressed.  
Tel: +604-904-4272; fax: +604-822-6003;  
e-mail: shahabs@chbe.ubc.ca

than pellets made from pine (Arshadi and Gref, 2005). Although the chemical/physical property changes of wood pellets influence the amounts of emissions, the storage environment and conditions should also be fully considered in the development of off-gassing mechanisms and characterization of emissions from wood pellets in storage.

The objective of this study was to investigate the effect of temperature, relative humidity (RH), and storage headspace on the off-gas emissions from wood pellets in an enclosed storage space.

## METHODS

### Materials and equipments

Twelve 10-l plastic containers (200 mm diameter and 320 mm high) were used to study gas emissions by loading different weights of wood pellets at different temperatures. Three containers were filled with 1.75, 3.5, and 5.25 kg of wood pellets to fill 25, 50, and 75% of the container volume. The average bulk density of pellets was  $700 \text{ kg m}^{-3}$ . A pellet mill in British Columbia supplied the pellets. The raw material for wood pellets was fresh pine sawdust and planer shavings from mountain pine (*Pinus contorta* Douglas) beetle-infested trees with an estimated 2 years beyond mortality. The moisture content of pellets as received was 5.1% (wet mass basis).

Four containers having the same head space ratio were each placed in one of the four temperature controlled ovens. Each oven was set at 10, 23 (room temperature), 35, or 45°C. These temperature treatments were repeated for each of the three head space ratios. Ten milliliters of gas samples were drawn daily from the containers by a gastight syringe. The composition of the sampled gas was analyzed by a gas chromatographic method [hydrogen flame ionization detector, (FID) and thermal conductivity detector (TCD)] using a GC-14A (SHIMADZU Corporation, Japan) to quantify concentrations of CO, CO<sub>2</sub>, CH<sub>4</sub>, O<sub>2</sub>, and N<sub>2</sub>. Prior to measurements, the temperatures of TCD and FID were set at 100 and 200°C, respectively. The gas chromatography (GC) was calibrated with standard CO, CO<sub>2</sub>, and CH<sub>4</sub> gases. The standard CO, CO<sub>2</sub>, and CH<sub>4</sub> gas concentrations were 1000, 5000, and 1000 p.p.m., respectively. The certified corresponding purity for each standard gas was 969 p.p.m. for CO based on HP 6890 method, 4898 p.p.m. for CO based on Carle 400 AGC, and 995 p.p.m. for CH<sub>4</sub> based on HP 6890 method. Argon and compressed air were used as the reference and carrier gases. A fused silica capillary column of inner diameter of 0.1 mm and 50 m long was used. Gas removal from each container at each time step and composition analysis was repeated twice.

Another set of eight 10-l plastic containers was used to investigate the effects RH and temperature had on wood pellet emissions. Two containers were

loaded with 3.5 kg of wood pellets (50% of container volume). A 500-ml dish was filled with water and placed at the bottom of one of the containers to create a humid space. The wood pellets were loaded on a screen (diameter < 1 mm) installed above the water-filled dish. Four groups of containers with the same set were sealed airtight and set at temperatures of 10°C, room temperature (~23°C), 35, and 45°C. A wireless temperature and humidity sensor was placed inside the container on the top of wood pellets. Temperature and moisture were recorded daily. During the first 3 days, 10 ml gas samples were drawn every day. The remaining 27 days, gas samples were drawn every 5 days. A total of 10 samples were removed from each container and measured daily by GC to determine the concentration of CO, CO<sub>2</sub>, and CH<sub>4</sub>. Tests were run until the concentration of CO, CO<sub>2</sub>, and CH<sub>4</sub> did not increase any further, which usually happened after ~30 days.

### Data analysis

The concentrations of CO, CO<sub>2</sub>, and CH<sub>4</sub> were converted to emission factors using the N<sub>2</sub> balance method (Kuang *et al.*, 2008). As an inert gas, N<sub>2</sub> is assumed not consumed or generated during the storage period. The N<sub>2</sub> concentration measured at the beginning (79%) over that measured after time  $t$  is used to calculate the change in the total moles of gas species in the container. Under constant temperature ( $T$ ) and pressure ( $P$ ), the concentration can be converted to an emission factor,  $f_i$  (in off-gas species per kilogram of pellets), for gas species  $i$  by

$$f_i = \frac{P(C_i V_g) M_{wt} C_{n0}}{RT M_p C_{nt}}, \quad (1)$$

where  $C_{n0}$  is the initial concentration of N<sub>2</sub>,  $C_{nt}$  is the measured concentration of N<sub>2</sub> at time  $t$ ,  $M_p$  is the total mass of wood pellets in the container calculated by N<sub>2</sub> balance method, and  $M_{wt}$  is the molecular weight of the gas species.  $V_g$  is the gas volume in the container which equals the difference between container volume ( $V$ ) and pellets volume ( $V_p$ ) (i.e.  $V_g = V - V_p$ ).  $P$  is gas pressure. The volume occupied by pellets ( $V_p$ ) was calculated based on the weight of pellets divided by the average density of a single pellet. The density of a single pellet is calculated as the average values of the weight of single pellets divided by the volume of single pellets. Volume is calculated from measuring diameter and length of the cylindrical pellet.

The previously developed first-order kinetic model (Kuang *et al.*, 2008) for evolution of gas emissions was used to fit the data of each gas species. The concentration ( $C$ ) and the emission factor ( $f$ ) for CO, CO<sub>2</sub>, and CH<sub>4</sub> were derived from the first-order reaction equation:

$$C_i(t) = C_{i,\infty} [1 - \exp(-k_i t)], \quad (2)$$

$$f_i(t) = f_{i,\infty} [1 - \exp(-k_i t)], \quad (3)$$

where  $C_{i,\infty}$  represents the maximum asymptote value for concentration, and  $f_{i,\infty}$  represents the maximum asymptote value for emission factor.  $k_i$  is the rate constant of the kinetic equation. The time for the emission concentration to reach half of its asymptote value ( $\tau_{1/2}$ ) is calculated to indicate how fast a gas is emitted from the stored pellets.

## RESULTS

### Headspace volume ratio ( $V_h/V$ )

Equation (1) was used to calculate the emission factor for each gas. Figure 1 shows the emission factor for  $\text{CO}_2$  measured in 12 containers, three headspace ratios and four temperatures as a function of storage time. The emission factors for  $\text{CO}_2$  increase over the storage time, a sharp rise at the beginning but approaching a plateau gradually. At the same

temperature, as the headspace volume increased from 25 to 75% of the container volume, the peak emission factor for  $\text{CO}_2$  increased. Under the same headspace ratio, the peak emission factor for  $\text{CO}_2$  increased as the temperature increased. Figure 2a,b shows the same time dependence of emission factors for CO and  $\text{CH}_4$ . Table 1 lists peak emission factors. These asymptote factors ( $f_\infty$ ) were calculated by least-square fitting of equation (3) to the experimental data.

Figure 3 shows the rate of oxygen depletion with time. At the same temperature, as the headspace volume increased from 25 to 75% of the container volume, the oxygen depletion decreased. Under the same headspace ratio, the oxygen depletion increased as the temperature increased. Therefore, a larger oxygen depletion occurs at a high temperature and at a low headspace.

The peak emission factors for  $\text{CO}_2$ , CO, and  $\text{CH}_4$  at high temperatures (35 and 45°C) were larger than those at low temperatures (10 and 23°C). A peak emission factor increases monotonously with increasing the headspace. In other words, both

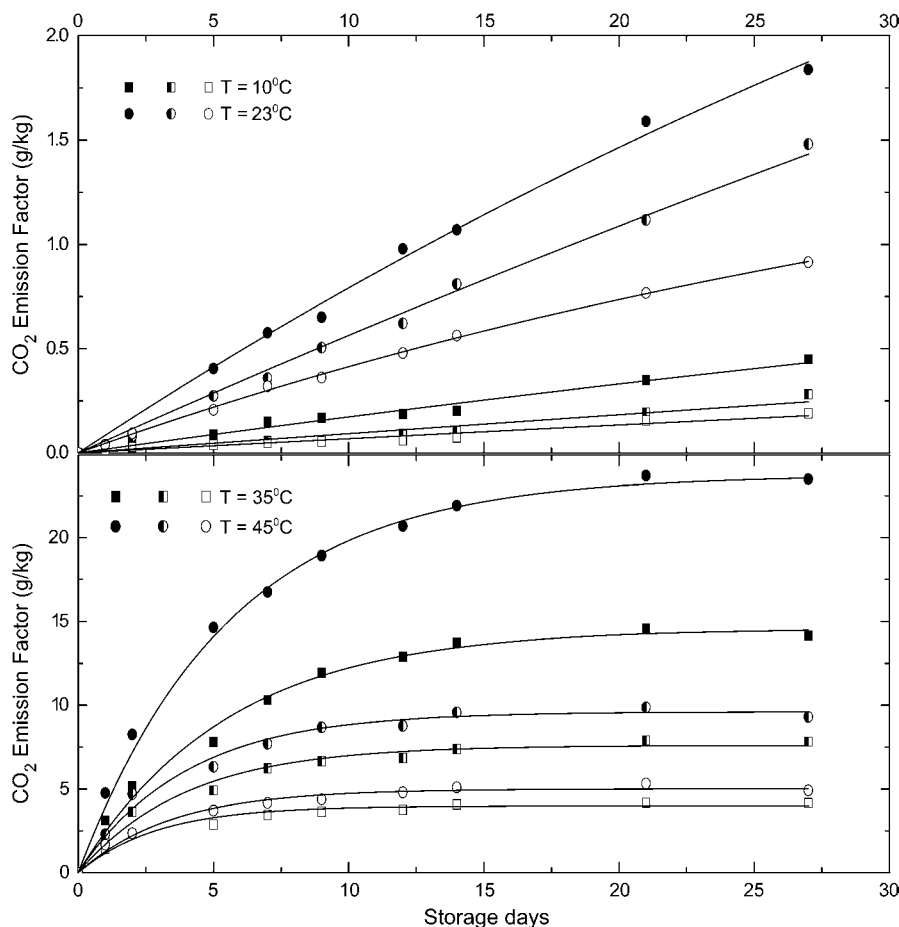
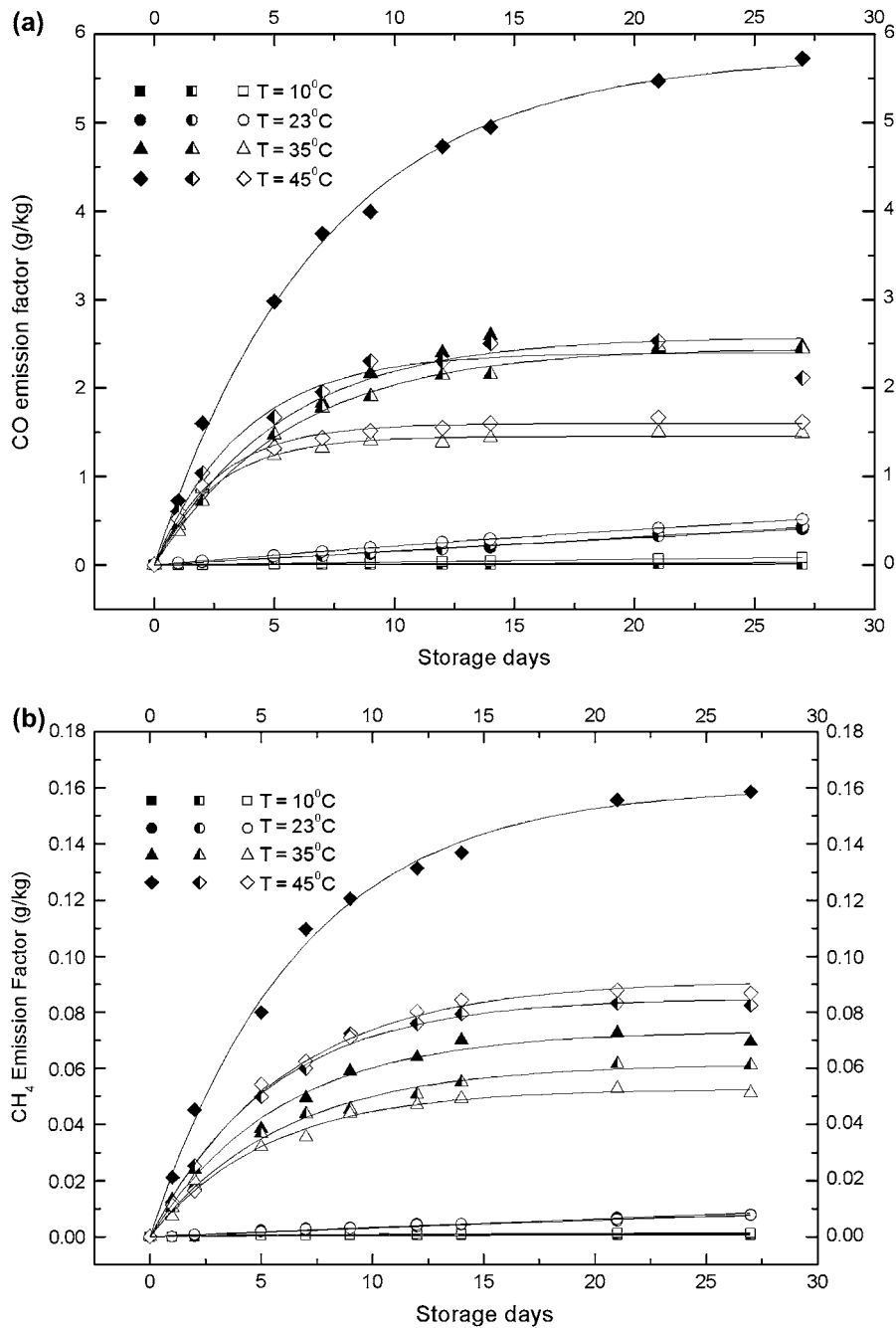


Fig. 1.  $\text{CO}_2$  emission factor at different headspaces and temperatures (closed symbols: headspace = 75%; half-closed symbols: headspace = 50%; open symbols: headspace = 25%).



**Fig. 2.** CO and CH<sub>4</sub> emission factor over time at different headspaces and temperatures (closed symbols: headspace = 75%; half-closed symbols: headspace = 50%; open symbols: headspace = 25%). (a) CO emission factor at different headspaces and temperatures. (b) CH<sub>4</sub> emission factor at different headspaces and temperatures.

temperature and headspaces are important factors affecting the off-gas emissions from wood pellets in storage.

*Relative humidity*

Figure 4 shows the RH inside each container as a function of storage time. The RH in each container drops sharply initially after loading of wood pellets,

indicating that wood pellets absorb the moisture available in the space. Unfortunately, we did not measure the moisture content of samples after each test. In an earlier experiment, Kuang *et al.*, (2008) found an average of 1% point reduction in moisture content when pellets stored in sealed and heated containers. The RH in the container with water placed at the bottom increased gradually over time, with

Table 1. Maximum emission factors for CO<sub>2</sub>, CO, and CH<sub>4</sub> at different temperatures and headspace (HS) ratios (%)

| Temperature (°C) | Maximum emission factor, $f_{\infty}$ (g kg <sup>-1</sup> ) |        |        |        |        |        |                 |        |        |
|------------------|-------------------------------------------------------------|--------|--------|--------|--------|--------|-----------------|--------|--------|
|                  | CO <sub>2</sub>                                             |        |        | CO     |        |        | CH <sub>4</sub> |        |        |
|                  | HS 75%                                                      | HS 50% | HS 25% | HS 75% | HS 50% | HS 25% | HS 75%          | HS 50% | HS 25% |
| 10               | 2.84                                                        | 2.47   | 2.27   | 0.09   | 0.07   | 0.06   | 0.00            | 0.00   | 0.00   |
| 23               | 3.71                                                        | 2.27   | 1.87   | 0.74   | 0.62   | 0.56   | 0.05            | 0.03   | 0.02   |
| 35               | 14.58                                                       | 7.60   | 3.99   | 3.58   | 2.45   | 1.45   | 0.07            | 0.06   | 0.05   |
| 45               | 23.73                                                       | 9.61   | 5.01   | 5.77   | 2.40   | 1.60   | 0.16            | 0.09   | 0.09   |

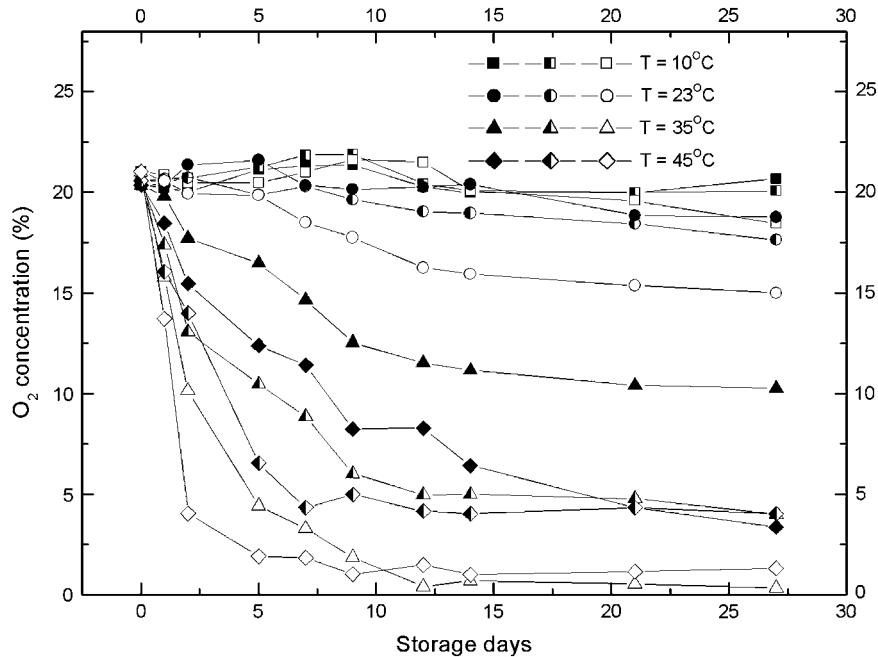


Fig. 3. Oxygen depletion at different headspaces and temperatures (closed symbols: headspace = 75%; half-closed symbols: headspace = 50%; open symbols: headspace = 25%).

higher RH at higher temperatures. Although the RH did not remain constant, the average RH in the container with water was generally higher than that in the container without water at the same temperature.

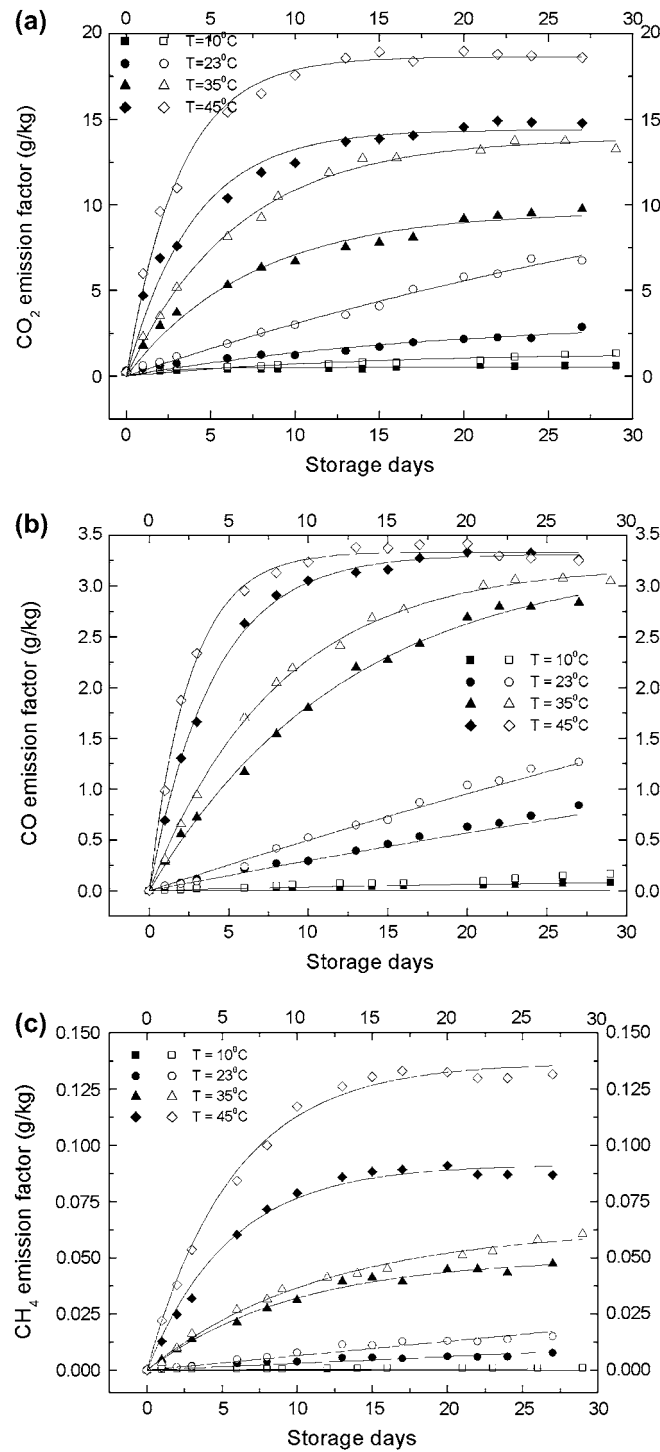
Figure 4a–c shows emission factors for CO<sub>2</sub>, CO, and CH<sub>4</sub> measured in the eight containers at different temperatures and RH as a function of storage time. Emission factors increased over time, faster at the beginning but slower when approaching a plateau. The values of peak emission factor ( $f_{\infty}$ ) and the time to reach the half peak emission factor ( $\tau_{1/2}$ ) are obtained by least-square fitting of experimental data using equations (2) and (3). Table 2 lists the results. The peak emission factor of CO<sub>2</sub>, CO, and CH<sub>4</sub> increased as the temperature increased from 10 to 45°C regardless of the RH level. It is also seen that the peak emission factor was higher at high RH at the same temperature. The differences between low and high RH were more significant for CO<sub>2</sub> and CH<sub>4</sub> as tem-

perature increased. Although the peak emission factor did not change a lot between the low and high RH for CO, the time to reach half of the peak emission factor was shorter at high RH than that at low RH.

Figure 5 shows the oxygen depletion over against time in the containers. The oxygen level in the containers decreased more significantly at higher temperatures. The storage RH also affected the oxygen depletion, with a faster oxygen depletion at a higher RH level.

## DISCUSSION

The dependence of headspace gas concentrations on temperature has been investigated in our previously published data (Kuang *et al.*, 2008). The current investigation demonstrated that both the headspace volume and the temperature have significant impacts on emission factors and the concentration



**Fig. 4.** Emission factors of CO<sub>2</sub>, CO, and CH<sub>4</sub> over time at different temperatures and RH (closed symbols: no water present; open symbols: with water present at the bottom).

buildup of CO, CO<sub>2</sub>, and CH<sub>4</sub> in sealed wood pellet containers. This can be explained by the decomposition mechanism of wood pellets. Biomass decomposes both chemically and biologically. If the thermal degradation is in dominance, the emission factor will

increase with the increase in temperature. However, the biological process may peak at a certain temperature and decrease at higher temperatures at which bacteria and fungi would perish (Agrios, 2004). The results from the current study suggest that chemical

Table 2. Maximum emission factor ( $f_x$ ) and days to reach half peak emission factor ( $\tau_{1/2}$ ) for CO<sub>2</sub>, CO, and CH<sub>4</sub> at different temperatures ( $T$ ) and moisture (RH)

| Temperature (°C) | Maximum emission factor, $f_x$ (g kg <sup>-1</sup> ) |         |        |         |                 |         | Half response time $\tau_{1/2}$ (days) |         |        |         |                 |         |
|------------------|------------------------------------------------------|---------|--------|---------|-----------------|---------|----------------------------------------|---------|--------|---------|-----------------|---------|
|                  | CO <sub>2</sub>                                      |         | CO     |         | CH <sub>4</sub> |         | CO <sub>2</sub>                        |         | CO     |         | CH <sub>4</sub> |         |
|                  | Low RH                                               | High RH | Low RH | High RH | Low RH          | High RH | Low RH                                 | High RH | Low RH | High RH | Low RH          | High RH |
| 10               | 0.51                                                 | 1.37    | 0.11   | 0.19    | 0.00            | 0.01    | 15.40                                  | 13.10   | 17.60  | 15.90   | 21.40           | 17.30   |
| 23               | 3.36                                                 | 7.17    | 0.98   | 1.17    | 0.02            | 0.04    | 13.30                                  | 11.60   | 14.00  | 11.30   | 9.40            | 7.20    |
| 35               | 9.62                                                 | 13.90   | 3.28   | 3.21    | 0.05            | 0.06    | 5.20                                   | 4.60    | 8.60   | 5.60    | 6.80            | 5.10    |
| 45               | 14.39                                                | 18.64   | 3.31   | 3.34    | 0.09            | 0.12    | 2.70                                   | 2.12    | 3.70   | 1.80    | 3.80            | 4.00    |

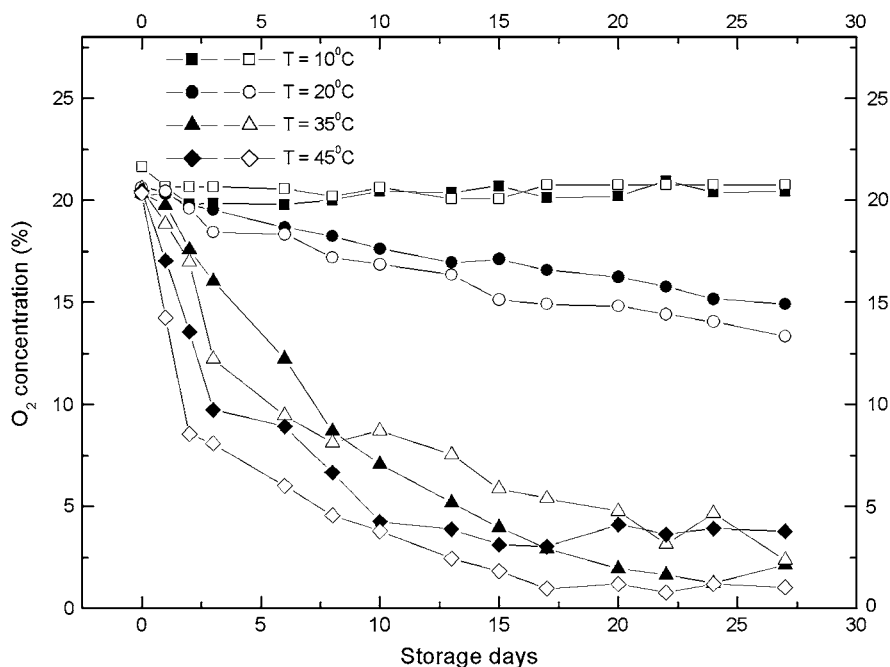


Fig. 5. Oxygen depletion at different temperature and moisture (closed symbols: no water present; open symbols: with water present at the bottom).

process via auto-oxidative degradation of fats and fatty acids (Svedberg *et al.*, 2004; Arshadi and Gref, 2005) may be the dominant mechanism for off-gassing because the emission rate increases monotonously with increasing temperature from 10 to 45°C, although biological process may also contribute to the emissions for moist biomass under a wet environment. Figure 4 shows that CO<sub>2</sub> emission factor is more sensitive to temperature than CO. This sensitivity is more pronounced at higher storage temperatures than at lower storage temperatures.

Moisture is another important factor influencing the off-gas emissions from wood pellets in storage. RH is investigated in this study, whereas the high moisture content of wood pellets (a high water activity in equilibrium with a high RH) could play an important role on the emissions from wood pellets during storage. It is

suggested from the current study that high storage moisture could cause higher emissions of CO<sub>2</sub>, CO, and CH<sub>4</sub>. Therefore, the control methods such as restricting the storage temperature, RH, or choosing an appropriate headspace ratio in a contained storage space could be effective in reducing the off-gas emissions from wood pellets in order to protect the workers' health.

Further studies of the thermal and biological decomposition of wood pellets under controlled conditions are needed to elucidate to what extent the biological process contributes to the decomposition of woody materials.

## CONCLUSIONS

1. Storage temperature is the key factor that affects the off-gassing from stored wood pellets. Higher

- peak emission factors are always associated with higher temperatures.
2. Increased headspace increases off-gas emissions because of the availability of oxygen for pellet decomposition.
  3. Increased humidity in the headspace in the container increases the emissions of CO<sub>2</sub>, CO, and CH<sub>4</sub>.

### FUNDING

Natural Sciences and Engineering Research Council of Canada (NSERC-CRDPJ342219-06); Wood Pellet Association of Canada (Grant 11R42500).

*Acknowledgements*—The authors are grateful to the member plants of the Wood Pellet Association of Canada and Fibreco Export Inc. of North Vancouver for providing wood pellet samples.

### REFERENCES

- Agrios GN. (2004) Plant pathology. 5th edn. New York, NY: Academic Press.
- Arshadi M, Gref R. (2005) Emission of volatile organic compounds from softwood pellets during storage. *For Prod J*; 55: 132–5.
- Chen PYS, Workman EC. (1990) Combustion and emission characteristics of sawdust-coal fine pellets. *Wood Fiber Sci*; 22: 377–87.
- Dinu R. (2006) Wood pellets combustion with rich and diluted air in HTAC furnace. Stockholm, Sweden: The Royal Institute of Technology.
- Johansson LS, Leckner B, Gustavsson L *et al.* (2004) Emission characteristics of modern and old-type residential boilers fired with wood logs and wood pellets. *Atmos Environ*; 38: 4183–95.
- Kuang X, Shankar TJ, Bi XT *et al.* (2008) Characterization and kinetics study of off-gas emissions from stored wood pellets. *Ann Occup Hyg*; 55: 675–83.
- Reuss R, Pratt S. (2000) Accumulation of carbon monoxide and carbon dioxide in stored canola. *J Stored Prod Res*; 37: 23–34.
- Svedberg U, Hogberg HE, Hogberg J *et al.* (2004) Emission of hexanal and carbon monoxide from storage of wood pellets, a potential occupational and domestic health hazard. *Ann Occup Hyg*; 48: 339–49.
- Svedberg U, Samuelsson J, Melin S. (2008) Hazardous off-gassing of carbon monoxide and oxygen depletion during ocean transportation of wood pellets. *Ann Occup Hyg*; 52: 259–66.
- Wadso L. (2007) Measuring chemical heat production rates of biofuels by isothermal calorimetry for hazardous evaluation modelling. *Fire Mater*; 31: 241–55.



## ISSUE BRIEF

# A BAD BIOMASS BET

## WHY THE LEADING APPROACH TO BIOMASS ENERGY WITH CARBON CAPTURE AND STORAGE ISN'T CARBON NEGATIVE



With every passing year—with every record-setting temperature or unthinkably destructive flood—the dangers of climate change become more apparent. As policymakers around the world increasingly recognize the devastating impacts of climate change, there is growing interest in not just curtailing new emissions of heat-trapping greenhouse gases from smokestacks, tailpipes, and buildings, but also finding ways to remove significant quantities of these gases already in the atmosphere, particularly carbon dioxide. In fact, most pathways modeled by the Intergovernmental Panel on Climate Change (IPCC) to avoid the worst impacts of climate change rely on extensive efforts to remove carbon dioxide from the atmosphere.<sup>1</sup>

One approach championed by the biomass industry is burning plant matter—most notably, trees and other wood from forests—as fuel to create electricity and capturing the resulting emissions from the power plant smokestack.<sup>2</sup> The technical name for this is “bioenergy with carbon capture and storage” (BECCS), and it is virtually the only

technological carbon dioxide (CO<sub>2</sub>) removal option explicitly included in the IPCC’s 2018 models.<sup>3</sup> BECCS is a particularly hot topic in the United Kingdom where multiple committees and agencies of the government are studying it.<sup>4</sup> However, despite its prominence in the IPCC report, policymakers should not assume BECCS is carbon negative. Studies have



already shown that the widespread use of this technology would tax global ecological limits, threaten public health, and cost a fortune.<sup>5</sup> Furthermore, the IPCC models largely looked at scenarios in which biofuels (transportation fuels made from biomass) are supplied primarily by dedicated specialty crops, while the U.K. government is most focused on biopower (electricity made from biomass) from forests and forest residues.<sup>6</sup> The analysis described in this issue brief shows that this forest/wood-based approach to BECCS, as it is likely to be implemented initially, will make the impacts of climate change worse, not better.

The biomass industry wants governments to adopt the idea that BECCS is inherently carbon negative (i.e., that it will result in a net removal of CO<sub>2</sub> from the atmosphere). This claim is based on the erroneous premise that bioenergy on its own is carbon neutral. Forests and other plants absorb carbon; thus, the argument goes, any carbon released while burning bioenergy can be absorbed by new plants as they grow. Artificially capturing and sequestering emitted CO<sub>2</sub>, proponents say, would allow those same plants to absorb additional carbon, making the BECCS process carbon negative. However, scientists are clear that this simplistic picture of bioenergy and BECCS is flawed. Biopower from forests without carbon capture is rarely carbon neutral.<sup>7</sup> According to the IPCC, it is inaccurate to “automatically consider or assume biomass used for energy [is] ‘carbon neutral,’ even in cases where the biomass is thought to be produced sustainably.”<sup>8</sup> Since bioenergy is not inherently carbon neutral, BECCS is not inherently carbon negative.

Moreover, adding carbon capture and storage (CCS) to a power plant requires additional energy for installation and operation, and ultimately no CCS technology captures *all* of the CO<sub>2</sub> at the smokestack.<sup>9</sup> Neither of these sources of carbon are currently accounted for by BECCS proponents.

Finally, BECCS proponents try to focus only on the carbon emissions resulting from combustion. However, NRDC commissioned a new analysis to examine the emissions from each step in the biomass supply chain, and our model revealed that more than one third of carbon emissions occurs off-site rather than at the power station and thus cannot be captured by the addition of CCS at the smokestack. This makes it difficult for BECCS to be carbon neutral, much less carbon negative.

This issue brief disaggregates and quantifies these *uncapturable* emissions in one specific and common scenario: pellets made of wood from pine plantations in the southeastern United States fueling a BECCS operation in the United Kingdom. Our analysis shows that this approach to BECCS not only is not carbon negative but drives substantially more carbon pollution than the current electrical grid averages in either the United States or the United Kingdom.

Given this information, it is clear that policymakers should not waste money on this approach to BECCS and should look carefully before betting on BECCS more generally.

© USDA Forest Service



## UNCAPTURABLE CARBON EMISSIONS ALONG THE BECCS SUPPLY CHAIN

The process of burning wood to generate electricity at large scale starts long before the smokestack. Producing the fuel requires cutting down trees, transporting the trees, drying the wood, turning the wood into pellets, and transporting the pellets. Only after all that can it be burned in a power plant. However, when talking about CCS, only the emissions from the power plant can potentially be captured; emissions from making and transporting the pellets are uncapturable. In addition, because old trees store more carbon than young growth, harvesting wood leads to “forgone sequestration,” the carbon storage that would have occurred over time in the uncut forest but never materializes—a loss that occurs even when accounting for regrowth of the new forest (the difference between dark and light trees in Figure 1). This loss of sequestration also cannot be captured at the smokestack.

To estimate uncaptured BECCS emissions and better understand if and under what conditions BECCS helps fight climate change and when it makes things worse, NRDC commissioned a study to model carbon emissions in one particular supply chain: Wood sourced from loblolly pine plantations in the southeastern United States used to produce pellets, which are then burned as fuel in the United Kingdom.

This scenario is representative of the most common supply chain for biomass to electricity. The largest investments in biopower without carbon capture have been made by the U.K. power company Drax, which operates the single largest power station in the United Kingdom and fuels two-thirds of it with biomass.<sup>10</sup> Drax sources over 60 percent of its wood from the U.S. Southeast, sourcing biomass in the form of wood pellets from Enviva, the largest manufacturer of wood pellets in the world.<sup>11</sup> Drax also operates three company-owned pellet mills in Louisiana and Mississippi, which it uses to self-supply biomass.

Drax is pushing the U.K. government to subsidize BECCS heavily, and the U.K. government appears poised to rely heavily on BECCS in its plan for achieving net-zero emissions by 2050 under the Paris Agreement.<sup>12</sup> While our analysis used data from Drax and southeastern U.S. forests, the results presented below suggest we should be looking closely and skeptically at claims of carbon negative emissions from BECCS more generally.

Using the numbers generated from our model, we found that for every megawatt-hour (MWh) of electricity that a standalone biopower plant would deliver to the grid, the uncapturable emissions along the supply chain equal 558 kilograms of carbon dioxide equivalent (kg CO<sub>2</sub>e). The total emissions rate from a bioenergy plant without CCS is 1,481 kg CO<sub>2</sub>e/MWh. When you add in CCS—which

FIGURE 1: SOURCES OF EMISSIONS FOR STANDALONE BIOPOWER AND BECCS

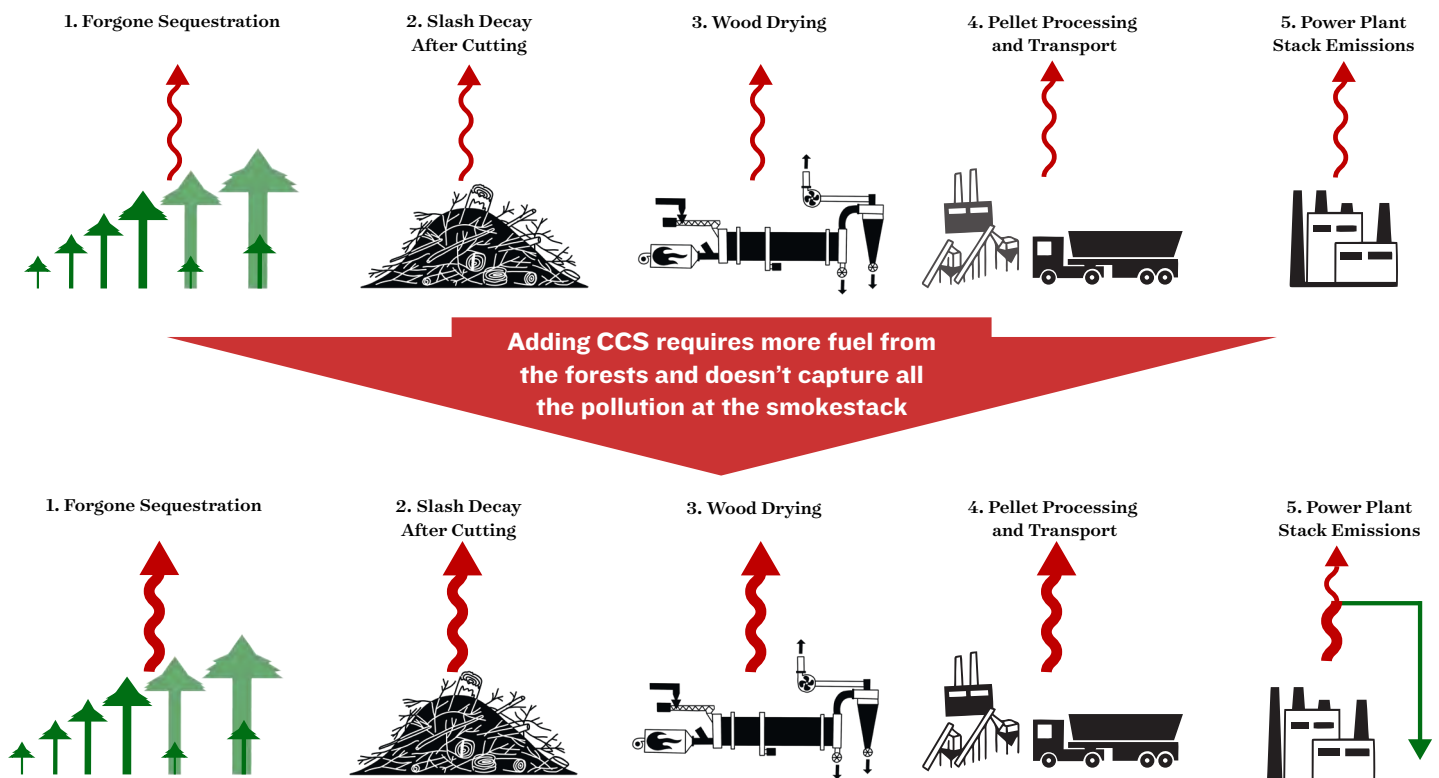
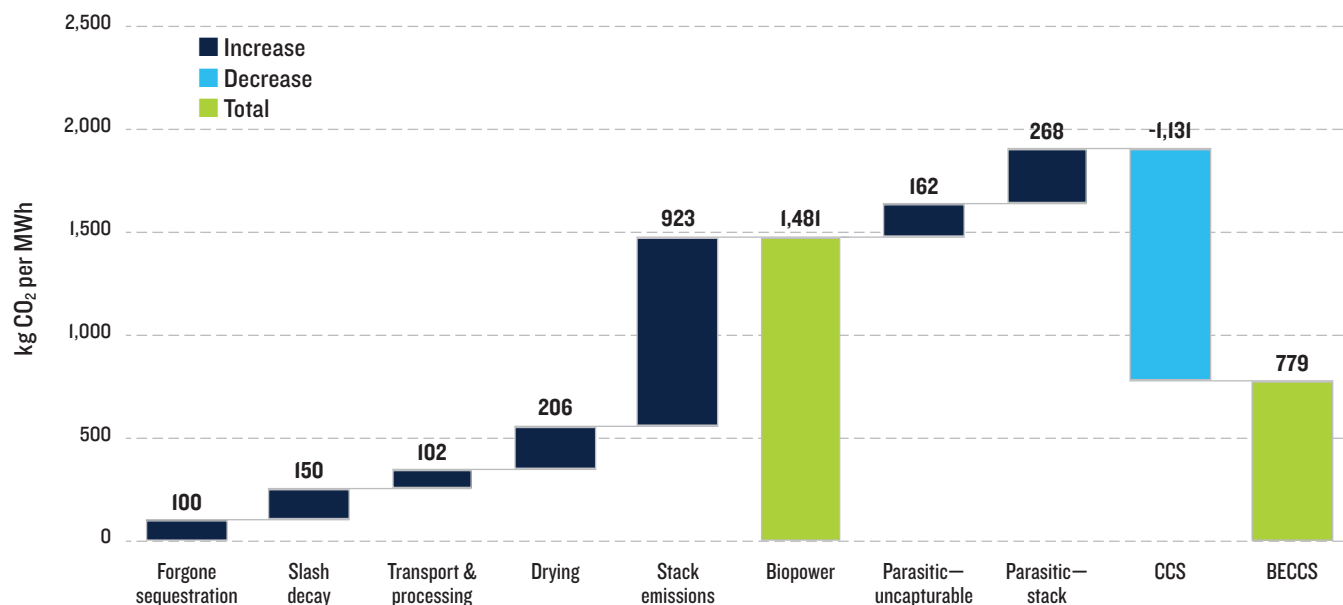




FIGURE 2: SUMMARY OF THE EMISSIONS FROM BIOPOWER AND BECCS



requires more fuel and does not have a 100 percent capture rate—the result is significant remaining emissions: 779 kg CO<sub>2</sub>e/MWh, as shown in Figure 2 (for calculations, see the methodology section at the end of this report). This is equal to about 80 percent of what comes out of a coal plant’s smokestack per megawatt-hour.

***The uncaptured emissions from BECCS are equal to about 80 percent of what comes out of a coal plant’s smokestack per megawatt-hour.***

### Bioenergy Reduces the Amount of Sequestered Carbon in a Forest—Increasing Carbon in the Atmosphere Instead

The common fallacy when talking about large-scale electricity generation from burning forest biomass is that because the trees absorbed their carbon from the atmosphere and can be replanted and grow back, over a long enough period of time cutting and burning forests won’t change the balance of carbon stored on the land versus in the atmosphere.<sup>13</sup> Even if this were true, simply maintaining the current amount of sequestered carbon in the world’s forests is not enough to avert the worst impacts of climate change. All pathways identified by the IPCC to address the climate crisis involve not just maintaining but enhancing forest carbon sinks.<sup>14</sup> Meanwhile, our model shows that bioenergy does not even maintain carbon

sequestration levels; cutting and burning forests in the southeastern United States leads to a net shift of carbon from the land to the air that lasts for decades.

When a stand of mature trees (about 25 years old in a southeastern plantation) is cut down or thinned, new trees can regrow, but the younger stand absorbs less carbon than the mature trees for decades.<sup>15</sup> Forgone sequestration, as mentioned earlier, is the difference in carbon storage between newly planted saplings in a harvested forest and the older forest that would have remained uncut in the absence of bioenergy demand.<sup>16</sup> Forgone sequestration happens even under the best-case scenario in which trees are replanted and/or regrow immediately.

In the southeastern plantations that we modeled, this accumulation of non-sequestered carbon lasts for decades until the new stand has grown old enough to balance out the sequestration debt that the cutting has caused. This picture is a little better when forests are thinned, which is the process of removing some trees so that those remaining have less competition for sunlight and nutrients and therefore can grow faster.<sup>17</sup> In forest plantations, this is done to maximize the financial value of the overall harvest. Unfortunately, the result is still more than two decades of forgone sequestration in the forest.

Forgone sequestration is a significant source of emissions that carbon accounting regimes in the United Kingdom and elsewhere currently ignore.<sup>18</sup> It results in decades during which there is more heat-trapping carbon in the atmosphere than there would have been absent bioenergy production. The IPCC has made it clear that we must immediately, dramatically reduce our carbon emissions to avoid the worst effects of climate change. Deploying biopower plants at a global scale would do the opposite.<sup>19</sup>

Our model was able to quantify this forgone sequestration and found that for a southeastern loblolly pine plantation, harvesting the wood to generate 1 megawatt-hour at a standalone biopower plant leads to between 68 and 370 kg CO<sub>2</sub>e of forgone sequestration. The lower end of the range reflects thinning practices, and the higher end represents the impact of clearcutting (where whole sections of forest are cut to the ground and then replanted). For comparison, a natural gas power plant emits about 360 kg CO<sub>2</sub>e/MWh at its smokestack.<sup>20</sup>

### Leftover Woody Materials Release Carbon as They Decay

After harvesting wood, there are treetops, limbs, and other woody materials left behind; these materials are known as “slash.” As slash decays, it breaks down just like a compost pile. Slash returns important nutrients to the forest soils, but most of the carbon ends up back in the atmosphere. Our model found that the slash from harvesting wood to generate 1 megawatt-hour at a standalone biopower plant releases about 150 kg CO<sub>2</sub>e.

### Drying, Processing, and Transporting Pellets Takes Energy—and Emits CO<sub>2</sub>

Wood must be dried before it can be processed into pellets. Just like drying your laundry, drying out this wood requires heat, and making that heat generates significant emissions. Even if the heat comes from burning some of the wood, these are emissions that can’t be captured by CCS. Our model found that this step in the supply chain can generate about 206 kg CO<sub>2</sub>e/MWh.

In addition to drying, wood needs to be transported to the processing site, ground and compressed into pellets, and then shipped, in our scenario across the Atlantic. All of these steps require the use of heavy machinery, trucks, and ships—all typically run on fossil fuels. These steps alone can generate about 102 kg CO<sub>2</sub>e/MWh.

### CCS Technology Takes Energy and Does Not Capture Everything at the Smokestack

While the focus of our model is on the uncapturable emissions associated with the bioenergy supply chain, it is important to note that carbon capture and storage technology both requires additional energy and does not have a 100 percent capture rate. Carbon capture technology is still fairly new. Current capture rates stand at around 90 percent, and the literature suggests that it will improve to only about 95 percent once the technology is mature.<sup>21</sup>

At the same time, capturing carbon from flue gas requires extra energy at the power plant.<sup>22</sup> This is especially true if capture technology is bolted on to an existing power plant (as is the case with most current plants) instead of integrated into the plant’s design.<sup>23</sup> Our model assumes that adding CCS requires about 29 percent more energy, which is a midpoint between bolting on and integrating capture



© Courtesy of Drax

technology. This means burning more pellets and producing more of the uncapturable emissions discussed above. When considering the additional energy required for CCS technology, combined with the 95 percent capture rate, our study found that generating 1 megawatt-hour at a BECCS power plant leads to 779 kg CO<sub>2</sub>e. As noted earlier, this is alarmingly close to the amount of pollution that a coal plant emits.

### CONCLUSION

Our modeling shows that employing BECCS at a power station like the one operated by Drax, while relying on the biomass supply chains similar to what Drax predominantly relies on today, will make the climate crisis worse for decades to come. It is possible that burning other types of biomass would be less harmful, but this approach to BECCS isn’t even close to carbon neutral, let alone carbon negative.

And there is no reason to think the situation is about to change. In fact, Drax is locking in its import supply chains. The company recently purchased Pinnacle Renewable Energy in Canada, the second-largest producer of industrial wood pellets in the world, and now has ownership interests in 17 other pellet plants and development projects across the United States and Canada.<sup>24</sup> This makes Drax not only the operator of the largest wood-burning power station in the world, but a top pellet manufacturer, with interests in expanding global markets for bioenergy.

What’s more, this analysis doesn’t take into account other challenges to BECCS. Assuming a carbon-negative approach to BECCS could be found, the amount of land that would need to be dedicated to biomass production would be enormous to meet the expansive visions some have for the technology. The integrated assessment models used by the IPCC for BECCS focus disproportionately on low-carbon energy crops and agricultural residues, they assume ambitious increases in available land and agricultural yields to furnish liquid biofuels, and many treat these feedstocks and end uses as carbon neutral.<sup>25,26,27</sup> Even with their underestimations, the IPCC models that include BECCS



in the pathway for limiting global warming to 1.5 degrees Celsius require up to 0.8 billion hectares of land.<sup>28</sup> That's equal to about 16 percent of the land currently used for agriculture worldwide; devoting that much land to biomass production risks major impacts on freshwater supplies, wildlife habitat, and food security.<sup>29</sup>

Furthermore, burning wood—just like burning fossil fuels—produces a host of local and regional air pollutants that cause an array of health harms, from asthma attacks to cancer to heart attacks, resulting in hospital visits and premature deaths.<sup>30</sup> These can be reduced through pollution controls but not eliminated.

Finally in addition to the terrifying land implications of deploying BECCS at scale and the public health threat from burning wood, there is the financial cost of BECCS. Drax is seeking tens of billions of pounds in subsidies from the U.K. government to try to make BECCS work. A recent estimate suggests that a proposed BECCS plant at the Drax power station will require a total £31.7 billion (\$42.9 billion) in subsidies over 25 years.<sup>31</sup>

The bottom line is that policymakers around the world should not bet on BECCS. Any program to subsidize BECCS at Drax or elsewhere using supply chains similar to the one modeled here will be ineffective in drawing down emissions, risk significant harm to nature, and divert public resources that would be better invested elsewhere. Instead, policies and public dollars should be invested in proven options, such as energy efficiency, non-emitting renewables such as wind and solar, and protecting existing forests and growing more of them.

## METHODOLOGY

Our analysis is intended to inform policy decisions, not to estimate emissions from specific power plants. To this end, the model we commissioned is heuristic and available to the public. While it has the capacity to look at a range of feedstocks, we have set the inputs to assess both the thinning and the clearcutting of southeastern loblolly pine plantations to generate the wood to produce pellets for electricity.

While the model looks just at the results for a BECCS power plant, we have broken out the results into those for a standalone biopower plant and then a BECCS plant.<sup>32</sup> This highlights the fact that uncapturable emissions are very much a concern for standalone biopower too. This methodology section lays out how we used the results from the model to calculate the emissions presented above.

### Forest Emissions

To calculate forest-related emissions, we needed to decide what type of forests to model. Drax reports getting a majority of its pellets from the U.S. South; of that, roughly one-quarter comes from thinnings and 38 percent from “low-grade round wood.” (Most of the remainder of the feedstocks are mill residues that don’t result in any forgone sequestration.<sup>33</sup>) This categorization is unclear, as thinning is a harvest practice and low-grade round wood is a class of timber. The alternative to thinning in a plantation is clearcutting. To understand the policy implications of building BECCS around similar sourcing, we first assumed that both thinnings and low-grade round wood are coming from loblolly pine plantations and then looked at the two different harvest practices. For this type of southeastern forest, thinning would generate forgone sequestration equal to 68 kg CO<sub>2</sub>e/MWh, and clearcutting would generate 370 kg CO<sub>2</sub>e/MWh.<sup>34</sup> If we assume that the low-grade round wood comes from thinning, we get 63 percent of the feedstock causing thinning-level forgone sequestration, with no further forgone sequestration from the balance of feedstock. This sets a lower limit of 43 kg CO<sub>2</sub>e/MWh of forgone sequestration. On the other hand, if we assume the low-grade round wood comes from clearcutting and weight the forgone sequestration accordingly, we get 157 kg CO<sub>2</sub>e/MWh. We have used the midpoint, 100 kg CO<sub>2</sub>e/MWh, as the nominal value.

The other source of forest emissions that must be accounted for is the decay of the slash—the tops and limbs left in the forest after thinning or clearcutting. These are important for a healthy, nutrient-rich soil, but some are taken to be burned to dry the wood that will be turned into pellets. Per our model, decay of the remaining slash results in 147–331 kg CO<sub>2</sub>e/MWh for loblolly pine and is the same for thinning and for clearcutting.<sup>35</sup> Applying this to 63 percent of the feedstock to mirror Drax’s mix, we have emissions of 93–208 kg CO<sub>2</sub>e/MWh and a midpoint nominal value of 150 kg CO<sub>2</sub>e/MWh.

### Pellet Drying, Processing, and Transportation

To look at forest biomass fueling power plants in the United Kingdom, we need to add the emissions associated with pelletizing and transporting pellets to the outputs from our model. Estimates



for transport and processing emissions range from 109 to 160 kg CO<sub>2</sub>e/MWh.<sup>36</sup> Recent reporting from Drax for processing and transport estimates these emissions at 109 kg CO<sub>2</sub>e/MWh, which includes 7 kg CO<sub>2</sub>e/MWh of emissions resulting from energy used to dry the wood in advance of pellet production.<sup>37</sup> Because our model has generated a separate estimate for emissions from drying (below), we have adjusted Drax's reported value to 102 kg CO<sub>2</sub>e/MWh to reflect transport/processing absent drying and to avoid double counting.<sup>38</sup>

Drying wood in advance of pellet production generates significant emissions. At harvest, a pine bole's mass can be over half water by weight.<sup>39</sup> This means that for every pound of oven-dry wood, green wood can hold more than a pound of water. Feedstock for a wood pellet plant, however, is limited to a moisture content of approximately 12 percent or less to manufacture finished wood pellets with a 7 percent moisture content.<sup>40</sup> For loblolly pine, our model, which is based on a review of the industry literature, generated estimates of pellet manufacturing drying emissions ranging from 190 to 222 kg CO<sub>2</sub>e/MWh, and we use the midpoint, 206 kg CO<sub>2</sub>e/MWh, as a nominal value.<sup>41</sup>

### Carbon Capture and Storage

As explained earlier, capturing carbon from flue gas requires extra energy, known as parasitic load, and capture technology does not capture all the CO<sub>2</sub>.<sup>42</sup> Using capture technology bolted on to an existing power plant is generally assumed to require more energy than capture technology integrated into the power plant's design.<sup>43</sup> We use our assumptions around bolt-on CCS technology to set our high parasitic load value and estimates from the literature for integrated design to set our low value. Our consultant surveyed published literature to discover that estimates of parasitic load for both approaches ranged widely, increasing the power plant's fuel demand by 15 percent to 43 percent. Because assessing this aspect of CCS technology is not our focus here, we simply chose the midpoint of this range, 29 percent, as our nominal value. This extra energy consumption at the power plant means more forests clearcut or thinned; more forgone sequestration; more slash decay; and more pellet drying, processing, and transporting. Adding up the extra uncapturable emissions from the fuel needed to meet the parasitic load, we get 162 kg CO<sub>2</sub>e/MWh. Furthermore, when this fuel is burned, there are more emissions at the stack—about 268 kg CO<sub>2</sub>e/MWh.<sup>44</sup>

The efficiency of carbon capture technology is also a function of technological maturity. Current capture rates are around 90 percent, and the literature suggests that it will improve to about 95 percent once the technology is mature.<sup>45</sup> We use the more favorable assumption for CCS and use 95 percent as our nominal value for capture efficiency.

### Adding Up the Emissions From BECCS

Once the forest is cut and the pellets are made and shipped across the ocean, they are burned in a power plant. The top 10 percent of coal power plants in the United States have an average efficiency of about 37.6 percent.<sup>46</sup> We use this efficiency to model a biopower plant without CCS. Meanwhile, all the carbon contained within the pellets is emitted from the stack. This results in a release of about

923 kg CO<sub>2</sub>e/MWh into the atmosphere.<sup>47</sup> These are the stack emissions just for biopower without CCS.

If we add up the emissions for a simple biomass-fueled power plant, we have 559 kg CO<sub>2</sub>e/MWh of uncapturable emissions plus 923 kg CO<sub>2</sub>e/MWh at the stack for a total of 1,481 kg CO<sub>2</sub>e/MWh. Again, these are just the emissions for biopower without CCS.

When we add emissions associated with meeting the parasitic load, we get 162 kg CO<sub>2</sub>e/MWh extra uncapturable emissions and 268 kg CO<sub>2</sub>e/MWh extra stack emissions. With a 95 percent capture efficiency, 1,131 kg CO<sub>2</sub>e/MWh are stored. As is summarized in Figure 2, this leaves BECCS responsible for an increase in pollution of 779 kg CO<sub>2</sub>e/MWh.

For reference, the stack emissions of a combined-cycle combustion turbine plant burning natural gas at 50 percent thermal efficiency are 360 kg CO<sub>2</sub>e/MWh, and the U.S. national average grid emission rate is 430 kg CO<sub>2</sub>e/MWh.<sup>48</sup> In Europe, U.K. grid emissions average 233 kg CO<sub>2</sub>e/MWh and E.U. grid emissions average 255 kg CO<sub>2</sub>e/MWh.<sup>49</sup>

## ENDNOTES

- 1 Intergovernmental Panel on Climate Change, *Global Warming of 1.5 °C: Summary for Policymakers*, October 2018, [https://www.ipcc.ch/site/assets/uploads/sites/2/2019/05/SR15\\_SPM\\_version\\_report\\_LR.pdf](https://www.ipcc.ch/site/assets/uploads/sites/2/2019/05/SR15_SPM_version_report_LR.pdf).
- 2 See for example: Drax Group, *Supporting the Deployment of Bioenergy Carbon Capture and Storage (BECCS) in the UK: Business Model Options*, April 2021, <https://www.drax.com/carbon-capture/supporting-the-deployment-of-bioenergy-carbon-capture-and-storage-beccs-in-the-uk-business-model-options/>.
- 3 The integrated assessment models used in the IPCC's most recent pathways report relied almost exclusively on afforestation, reforestation, and BECCS. (See Chapter 2.3.4.) Only 2 of the 21 IAMs also explicitly modeled direct air capture of CO<sub>2</sub>. (See Table 2.SM.6.) The report notes that while other forms of carbon dioxide removal have been added to IAMs since the AR5, BECCS is still heavily favored by the models despite BECCS being deployed beyond the world's capacity and other options offering a range of co-benefits. Intergovernmental Panel on Climate Change, *Global Warming of 1.5 °C, Chapter 2*, October 2018, [https://www.ipcc.ch/site/assets/uploads/sites/2/2019/05/SR15\\_Chapter2\\_Low\\_Res.pdf](https://www.ipcc.ch/site/assets/uploads/sites/2/2019/05/SR15_Chapter2_Low_Res.pdf) and [https://www.ipcc.ch/site/assets/uploads/sites/2/2019/05/SR15\\_Chapter2\\_SM\\_High\\_Res.pdf](https://www.ipcc.ch/site/assets/uploads/sites/2/2019/05/SR15_Chapter2_SM_High_Res.pdf).
- 4 See for example: U.K. Parliament Environmental Audit Committee, "Call for Evidence: Technological Innovations and Climate Change: Negative Emissions Technologies," accessed September 30, 2021, <https://committees.parliament.uk/call-for-evidence/599/>; and U.K. Parliament Business, Energy and Industrial Strategy Committee, "Net Zero Governance: Inquiry," accessed September 30, 2021, <https://committees.parliament.uk/work/1343/net-zero-governance/>.
- 5 Felix Creutzig et al., "Considering Sustainability Thresholds for BECCS in IPCC and Biodiversity Assessments," *GCB-Bioenergy* 13 (February 15, 2021): 510–515, <https://doi.org/10.1111/gcbb.12798>; Zhipin Ai et al., "Global Bioenergy with Carbon Capture and Storage Potential Is Largely Constrained by Sustainable Irrigation," *Nature Sustainability*, July 2021, DOI: <http://dx.doi.org/10.1038/s41893-021-00740-4>; American Lung Association et al., "Letter from Prominent Health Organizations to U.S. Congress about the Health Harms of Biomass," September 13, 2016, <https://www.naccho.org/uploads/downloadable-resources/Policy-and-Advocacy/Health-organizational-letter-health-impacts-of-biomass.pdf>; Phil MacDonald and Tomos Harrison, "Understanding the Cost of the Drax BECCS Plant to UK Consumers," *Ember*, May 25, 2021, <https://ember-climate.org/project/cost-drax-beccs-plant/>.
- 6 According to the IPCC, their integrated assessment models assume bioenergy is supplied mostly from second generation biomass feedstocks such as dedicated cellulosic crops (for example, miscanthus or poplar) as well as agricultural and forest residues, with forest residues a relatively very small component. IPCC, *Global Warming of 1.5 °C, Chapter 2*, 124, [https://www.ipcc.ch/site/assets/uploads/sites/2/2019/05/SR15\\_Chapter2\\_Low\\_Res.pdf](https://www.ipcc.ch/site/assets/uploads/sites/2/2019/05/SR15_Chapter2_Low_Res.pdf).
- 7 Michael T. Ter-Mikaelian, Stephen J. Colombo, and Jiaxin Chen, "The Burning Question: Does Forest Bioenergy Reduce Carbon Emissions? A Review of Common Misconceptions About Forest Carbon Accounting," *Journal of Forestry* 11, no. 1 (January 2015): 57–68, <http://www.ingentaconnect.com/content/saf/jof/2015/00000113/00000001/art00009>; Sami Yassa, "Think Wood Pellets Are Green? Think Again," NRDC, May 2015, <https://www.nrdc.org/sites/default/files/bioenergy-modelling-IB.pdf>; Mary S. Booth, "Not Carbon Neutral: Assessing the Net Emissions Impact of Residues Burned for Bioenergy," *Environmental Research Letters* 13, no. 3 (February 21, 2018), <https://iopscience.iop.org/article/10.1088/1748-9326/aaac88>; Thomas Buchholz, John Gunn, and Brian Kittler, "The Carbon Impacts of UK Electricity Produced by Burning Wood Pellets from Drax's Three U.S. Mills," Spatial Informatics Group, May 27, 2019, [https://www.southernenvironment.org/uploads/publications/2019-05-27\\_Drax\\_emissions\\_-\\_SIG\\_report\\_Phase\\_II.PDF](https://www.southernenvironment.org/uploads/publications/2019-05-27_Drax_emissions_-_SIG_report_Phase_II.PDF).
- 8 Intergovernmental Panel on Climate Change, "Task Force on National Greenhouse Gas Inventories: Frequently Asked Questions" (Q2–10, accessed September 23, 2021, [https://report.ipcc.ch/sr15/pdf/sr15\\_spm\\_final.pdf](https://report.ipcc.ch/sr15/pdf/sr15_spm_final.pdf).
- 9 Roel Hammerschlag, *Uncaptured Biogenic Emissions from BECCS Fueled by Forestry Feedstocks*, Hammerschlag LLC, August 2021, 16–18, <https://www.nrdc.org/sites/default/files/beccs-emissions-study-report.pdf>.
- 10 Drax Group, *Annual Report and Accounts 2020*, 54, accessed September 23, 2021, [https://www.drax.com/wp-content/uploads/2021/03/Drax\\_AR2020.pdf](https://www.drax.com/wp-content/uploads/2021/03/Drax_AR2020.pdf).
- 11 Enviva, "About Us," accessed September 23, 2021, <https://www.envivabiomass.com/about-us/>.
- 12 Jillian Ambrose, "Drax Carbon-Capture Plan Could Cost British Households £500—Study," *Guardian*, May 24, 2021, <https://www.theguardian.com/business/2021/may/25/drax-carbon-capture-plan-could-cost-british-households-500-study>.
- 13 See for example this claim from the National Alliance of Forest Owners: "Because the energy is produced using organic, renewable, regenerating material that follows a natural carbon cycle, the use of wood biomass for energy production does not increase greenhouse gas (GHG) concentrations in the atmosphere over time if done sustainably." National Alliance of Forest Owners, "Issues: A Renewable Resource," accessed September 28, 2021, <https://nafoalliance.org/issues/a-renewable-resource/>.
- 14 IPCC, *Global Warming of 1.5 °C: Summary for Policymakers*.
- 15 James E. Smith et al., *Methods for Calculating Forest Ecosystem and Harvested Carbon with Standard Estimates for Forest Types of the United States*, U.S. Department of Agriculture, General Technical Report, Forest Service, April 2006, [http://www.actrees.org/files/Research/ne\\_gtr343.pdf](http://www.actrees.org/files/Research/ne_gtr343.pdf).
- 16 It is tempting to argue that since plantations are grown for merchantable wood, they would be cut down anyway and thus there is no forgone sequestration. There are two reasons this is wrong. First, bioenergy adds marginal demand maintaining or increasing the land area managed, meaning forgone sequestration happens directly or indirectly. Second, in the context of evaluating a climate policy, the alternative should be the best use of the land, which means cutting down a forest comes with the cost of forgone sequestration.
- 17 This process is known as "release." Release is a forest stand's growth response to the removal of trees (in this case, thinning) that compete for nutrients and sunlight. Maryland Department of Natural Resources, *Glossary of Forest Terms*, accessed September 23, 2021, <https://dnr.maryland.gov/forests/Pages/gloss.aspx>.
- 18 See for example: "Renewables Obligation Order 2015, Schedule 3 Land Criteria," accessed September 26, 2021, <https://www.legislation.gov.uk/ukdsi/2015/9780111138359/schedule/3>; and Ofgem, *Renewables Obligation: Sustainability Criteria*, April 24, 2018, [https://www.ofgem.gov.uk/sites/default/files/docs/2018/04/ro\\_sustainability\\_criteria.pdf](https://www.ofgem.gov.uk/sites/default/files/docs/2018/04/ro_sustainability_criteria.pdf).
- 19 IPCC, *Global Warming of 1.5 °C; Chapter 2*.
- 20 U.S. Environmental Protection Agency (hereafter EPA), "eGRID Summary Tables 2018," accessed March 9, 2020, <https://www.epa.gov/egrid/download-data>.
- 21 Hammerschlag, *Uncaptured Biogenic Emissions*, 16.
- 22 *Ibid.*, 16–18.
- 23 I. Pfaff, J. Oexmann, and A. Kather, "Optimized Integration of Post-Combustion CO<sub>2</sub> Capture Process in Greenfield Power Plants," *Energy* 35, no. 10 (October 1, 2010): 4030–41, <https://doi.org/10.1016/j.energy.2010.06.004>.
- 24 "Drax Completes Acquisition of Pinnacle Renewable Energy Inc," *GlobeNewswire*, April 13, 2021, <https://www.globenewswire.com/news-release/2021/04/13/2209296/0/en/Drax-Completes-Acquisition-of-Pinnacle-Renewable-Energy-Inc.html>; "Drax Begins Construction of the First of Three New Pellet Plants in Arkansas," *Lesprom*, May 7, 2021, [https://www.lesprom.com/en/news/Drax\\_begins\\_construction\\_the\\_first\\_of\\_three\\_new\\_pellet\\_plants\\_in\\_](https://www.lesprom.com/en/news/Drax_begins_construction_the_first_of_three_new_pellet_plants_in_)



- 25 According to the IPCC, their Integrated Assessment Models (IAMs) assume bioenergy is supplied mostly from second generation biomass feedstocks such as dedicated cellulosic crops (for example Miscanthus or poplar) as well as agricultural and forest residues, with forest residues a relatively very small component. IPCC, *Global Warming of 1.5 °C; Chapter 2*, pg 124.
- 26 In the IPCC assessments, BECCS is not limited to the power sector, with IAMs projecting on average at least 60 percent of primary energy from BECCS going to liquid biofuels. See Mathilde Fajardy et al., *BECCS Deployment: A Reality Check*, Imperial College of London, Grantham Institute, Briefing Paper No 28, January 2019, 3. <https://www.imperial.ac.uk/media/imperial-college/grantham-institute/public/publications/briefing-papers/BECCS-deployment---a-reality-check.pdf>.
- 27 Almost all of the IAMs used by the IPCC assume that the feedstocks and/or end uses as carbon neutral; See, Isabela Butnar et al., “A Deep Dive Into the Modelling Assumptions for Biomass with Carbon Capture and Storage (BECCS): A Transparency Exercise,” *Environmental Research Letters*, July, 2020, 7, <https://iopscience.iop.org/article/10.1088/1748-9326/ab5c3e/pdf>; Duncan Brack and Richard King, “Net Zero and Beyond: What Role for Bioenergy with Carbon Capture and Storage?,” Chatham House, Research Paper 29, January 2020, <https://www.chathamhouse.org/2020/01/net-zero-and-beyond-what-role-bioenergy-carbon-capture-and-storage-0/beccs-carbon-negative>.
- 28 Fajardy et al., “BECCS deployment: a reality check.”
- 29 Creutzig et al., “Considering sustainability thresholds for BECCS”; Ai et al., “Global bioenergy with carbon capture and storage potential is largely constrained by sustainable irrigation.”
- 30 ALA et al., “Letter from prominent health organizations to U.S. Congress.”
- 31 MacDonald and Harrison, “Understanding the Cost of the Drax BECCS Plant to UK Consumers.”
- 32 Please see the supplemental materials for detailed calculations.
- 33 See, for example, Drax Group, *Annual Report and Accounts 2020*; Drax reports the proportion of feedstocks in its U.S. supply from “mill waste” (35 percent), “branches and tops” (2 percent), “thinnings” (25 percent) and “low grade roundwood” (38 percent).
- 34 Based on the tCO<sub>2</sub>e/mmBtu for 20-year foregone sequestration in Technical Appendix (Table 6) converted to an output basis assuming a heat rate of 9.08mmBtu/MWh for a stand-alone biopower plant with no CCS. See pp. 17–18 of the Technical Appendix and supplemental materials; note that this heat rate is aggressive for a solid fuel power plant.
- 35 See endnote 27.
- 36 Duncan Brack, *Woody Biomass for Power and Heat: Impacts on the Global Climate* (2017), Chatham House, <https://www.chathamhouse.org/sites/default/files/publications/research/2017-02-23-woody-biomass-global-climate-brack-final2.pdf>; Mary Booth, “New UK Biomass Policy Removes Subsidies For High-Carbon Wood Pellets,” Partnership for Policy Integrity, (2018); Drax Group, “Biomass Supply Chain Emissions,” accessed TK, <https://www.drax.com/sustainability/sustainable-bioenergy/sourcing-sustainable-biomass/>.
- 37 Drax’s estimates of supply chain emissions report 7 kg CO<sub>2</sub>/MWh. This represents only 3 percent of drying energy needs based on our estimate of 237 kg CO<sub>2</sub>/MWh. They have claimed the majority of their drying emissions are zero, based on the false assertion that these “biogenic” sources (such as logging slash) produce no emissions. See Drax Group, *Annual Report and Accounts 2020*; and Drax Group, “The Biomass Carbon Calculator,” accessed September 26, 2021, <https://www.drax.com/sustainability/sustainable-bioenergy/the-biomass-carbon-calculator/>.
- 38 Note that Drax has reported this for a stand-alone biopower plant; so, we don’t need to adjust for CCS.
- 39 U.S. Department of Agriculture, Forest Products Laboratory, *Wood Handbook: Wood as an Engineering Material*, General Technical Report FPL–GTR–190, April 2010, [https://www.fpl.fs.fed.us/documnts/fplgtr/fpl\\_gtr190.pdf](https://www.fpl.fs.fed.us/documnts/fplgtr/fpl_gtr190.pdf).
- 40 Jaya Shankar Tumuluru et al., “A Review of Biomass Densification Systems to Develop Uniform Feedstock Commodities for Bioenergy Application,” *Biofuels, Bioproducts and Biorefining* 5, no. 6 (October 6, 2011): 683–707, <https://doi.org/10.1002/bbb.324>.
- 41 See endnote 27.
- 42 Hammerschlag, *Uncaptured Biogenic Emissions*, 16–18.
- 43 Pfaff et al., “Optimized Integration of Post-Combustion CO<sub>2</sub> Capture Process.”
- 44 For both the extra uncapturable emissions and the extra stack emissions, we calculate 29 percent of the stand-alone biopower plant emissions in these categories. This means we are reporting emissions on a MWh output-to-the-grid basis.
- 45 Hammerschlag, *Uncaptured Biogenic Emissions*, 16.
- 46 On a higher heating value (HHV) basis. Hammerschlag, *Uncaptured Biogenic Emissions*, 17–18.
- 47 Per our model (see rows “Tables C1–C4”110:129), loblolly pine has an emissions rate of 0.1016 tCO<sub>2</sub>e/mmBtu. Converting this to an output-to-the-grid basis at 9.08mmBtu/MWh results in emissions of 923 kg CO<sub>2</sub>e/MWh.
- 48 U.S. EPA, “eGRID Summary Tables 2018.”
- 49 Department for Business, Energy & Industrial Strategy, “Conversion Factors 2020: Condensed Set”, Tab: “UK Electricity” cell F24, accessed September 26, 2021, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/891105/Conversion\\_Factors\\_2020\\_-\\_Condensed\\_set\\_for\\_most\\_users\\_.xlsx](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/891105/Conversion_Factors_2020_-_Condensed_set_for_most_users_.xlsx); European Environmental Agency, “Greenhouse Gas Emission Intensity of Electricity Generation in Europe,” accessed September 23, 2021, <https://www.eea.europa.eu/data-and-maps/indicators/overview-of-the-electricity-production-3/assessment-1>.

# **Guideline: Storage and Handling of Wood Pellets**

Resultat Kontrakt (RK) Report

Wolfgang Stelte

December 2012

**Energy & Climate  
Centre for Renewable Energy and Transport  
Section for Biomass**



**DANISH  
TECHNOLOGICAL  
INSTITUTE**

Gregersensvej 2C  
DK-2630 Taastrup

Tel: +45 7220 2000  
Fax: +45 7220 2019

info@teknologisk.dk  
www.teknologisk.dk

## Contents

|       |                                                               |    |
|-------|---------------------------------------------------------------|----|
| 1     | INTRODUCTION.....                                             | 3  |
| 2     | SCOPE.....                                                    | 4  |
| 3     | TERMINOLOGY AND DEFINITIONS.....                              | 4  |
| 4     | SOLID BIOFUELS .....                                          | 4  |
| 5     | GENERAL RISK EVALUATION OF BIOMASS HANDLING AND STORAGE ..... | 4  |
| 5.1   | Self-heating and self-ignition .....                          | 5  |
| 5.2   | Off-gas formation and oxygen depletion.....                   | 5  |
| 5.3   | Dust formation.....                                           | 6  |
| 5.4   | Biological hazards .....                                      | 7  |
| 6     | HANDLING OF WOOD PELLETS .....                                | 7  |
| 6.1   | Loading and transport (in closed vessel) .....                | 8  |
| 6.2   | Unloading and internal handling .....                         | 8  |
| 6.3   | Conveying .....                                               | 8  |
| 7     | STORAGE OF SOLID BIOFUELS.....                                | 8  |
| 7.1   | Storage types .....                                           | 9  |
| 7.1.1 | Silo .....                                                    | 9  |
| 7.1.2 | Flat storage .....                                            | 9  |
| 7.2   | Self-heating and ignition risk .....                          | 9  |
| 7.3   | Monitoring of temperature, off-gasses and moisture .....      | 10 |
| 7.4   | Safety measures for handling personnel .....                  | 10 |
|       | REFERENCES.....                                               | 11 |



## 1 INTRODUCTION

The use of solid biofuels i.e. wood pellets and briquettes has increased significantly during the last 15 years. Biomass briquettes are mainly used by small scale consumer's i.e. private households while biomass pellets are used both within the private sector and for commercial heat and power production in large scale, industrial plants. During the past 10 years wood pellets have become an important energy carrier to substitute coal in the Danish energy sector. Today most pellets used in Denmark are produced abroad and shipped to Denmark in large container vessels where they are used as fuel in combined heat and power plants (CHP-plants), for district heating and small scale pellet boilers. The pellet consumption in Denmark is expected to increase strongly within the next 10 years and it is therefore necessary to provide a guideline for secure handling of solid biofuels. Recently different guidelines have been published by the Association of German Engineers [1], German pellets institute [2] or the Nordic Innovation Centre [3] dealing with safe handling and storage of solid biofuels. Safety considerations of biomass handling have been picked up in several journal articles and books dealing with solid biofuels [4-11].

A number of serious incidents have been reported across Europe in connection with false handling of wood pellets. Some of them have resulted in injury or even death of the handling personnel and some resulted in great damage and financial loss for the companies handling the pellets. Table 1 provides examples of accidents in relation with handling and storage of solid biofuels during the last 10 years. Most people consider wood materials as harmless, natural products and underestimate the risk potential, especially when storing it in closed compartments i.e. silo, storage room or transport vessels.

**Table 1: Examples of accidents related to the storage and transportation of solid biofuels [4]**

| Year | Place         | Accident                                                                                                                                                                                                       |
|------|---------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2002 | Rotterdam     | A ship loader on board of the "Weaver Arrow" loaded with wood pellets went down in the storage compartment and suffocated                                                                                      |
| 2005 | Gruvön        | A seaman suffocated on board of the wood freighter "Eken" when he went down the stairs to the cargo room that was filled with pulpwood.                                                                        |
| 2006 | Helsingborg   | A seaman on board of the "Saga Spray" suffocated when he went down the stairs to the storage compartment filled with wood pellets. A ship loader and a rescue team rushing for assistance got severely injured |
| 2006 | Skelleftehamn | A seaman on board of the "Noren" died when he entered a storage compartment filled with wood chips                                                                                                             |
| 2007 | Timrå         | The captain and one seamen of the wood freighter "Fembria" died when they walked in the storage compartment filled with timber wood.                                                                           |
| 2007 | Finland       | A person died when walking into a small (10 t) wood pellets silo.                                                                                                                                              |
| 2008 | Finland       | Another person died when walking into a small (10 t) wood pellets silo.                                                                                                                                        |
| 2009 | Bornholm      | Two seaman on board of the "Amirante" died when they entered the cargo room filled with wood pellets. The pellets were loaded one day before.                                                                  |
| 2010 | Germany       | A person suffocated in a pellet storage (150 t)                                                                                                                                                                |
| 2010 | Ireland       | A person suffocated in a pellet storage (7 t)                                                                                                                                                                  |
| 2011 | Switzerland   | A person suffocated in a pellet storage (100 t)                                                                                                                                                                |



## 2 SCOPE

The intention of this guideline is to provide recommendations for the handling of solid biofuels in a responsible and safe way, minimizing risks for health and safety. The guideline is addressing both large and small scale producers, transporters and end users of solid biofuels. Focus is set on wood pellets and wood chips since they are by far the most common type of solid biofuels in Denmark.

## 3 TERMINOLOGY AND DEFINITIONS

Terms and terminology of this guideline apply as given in EN 14588. Specifications of different types of solid biofuels are defined according to EN 14961-1

## 4 SOLID BIOFUELS

Solid biofuels cover a wide range of sizes and shapes from wood pellets to straw bales. Solid biofuels and their typical dimensions and preparation method are specified in the European standard EN 14961 as shown in Table 2.

**Table 2. Major trade form of solid biofuels according to EN 14961-1 [1]**

| Name                          | Typical particle size | Preparation                                                                  |
|-------------------------------|-----------------------|------------------------------------------------------------------------------|
| Whole tree                    | > 500 mm              | No preparation or delimbing                                                  |
| Wood chips                    | 5 to 100 mm           | Cutting with sharp tools                                                     |
| Hog fuel                      | undefined             | Crushing with blunt tools                                                    |
| Log wood/firewood             | 100 to 1000 mm        | Cutting with sharp tools                                                     |
| Bark                          | undefined             | Debarking residues from trees, can be crushed, shredded or unshredded        |
| Bundle                        | undefined             | Lengthwise oriented & bound                                                  |
| Fuel powder                   | < 1 mm                | Milling                                                                      |
| Sawdust                       | 1 to 5 mm             | Cutting with sharp tools                                                     |
| Shavings                      | 1 to 30 mm            | Planing with sharp tools                                                     |
| Briquettes                    | Diameter > 25 mm      | Mechanical compression                                                       |
| Pellets                       | Diameter < 25 mm      | Mechanical compression                                                       |
| Small square bales            | 0.1 m <sup>3</sup>    | Compressed and bound to cubes                                                |
| Big square bales              | 3.7 m <sup>3</sup>    | Compressed and bound to cubes                                                |
| Round bales                   | 2.1 m <sup>3</sup>    | Compressed and bound to cylinders                                            |
| Chopped straw or energy grass | 10 to 200 mm          | Chopped during harvesting or before combustion                               |
| Grain or seed                 | undefined             | No preparation or drying except for process operations necessary for storage |
| Shells and fruit stones       | 5 to 15 mm            | No preparation or pressing and extraction by chemicals                       |
| Fiber cake                    | undefined             | Prepared from fibrous waste by dewatering                                    |

## 5 GENERAL RISK EVALUATION OF BIOMASS HANDLING AND STORAGE

Major problems that can arise when handling large amounts of biomass are connected to dust formation, off gassing, self-heating and biological hazards. The quality of biomass is subject of large variation and depending on biomass origin, size, shape, composition and moisture content different problems can occur during handling and storage. The most common problems are summarized in the following section:



## 5.1 Self-heating and self-ignition

Self-heating of biomass can occur either by chemical oxidation reactions and/or microbiological decay. The more fresh the biomass and the higher the moisture content the greater is the risk for self-heating and potential self-ignition. Self-heating of biomass is a serious problem and has been cause of several incidents.

Oxidation reactions require oxygen and the oxidation rate of the biomass seems to depend on the age of the biomass and generally decreases with storage time. The reactions go along with oxygen depletion which is a potential risk for pellet handling personal. The mechanism behind the oxidation reactions are not completely understood but it is likely connected to the biomass extractives. Heat development due to microbiological decay is to large extent depending on the moisture content and the surface area [5].

There are some general recommendations to avoid self-heating and self-ignition of biomass. According to Obernberger and Thek they can be summarized as follows [5]:

- Avoid storage and transport of large volumes if the fuel's tendency for self-heating is unknown
- Be conscious of the risk of self-heating and spontaneous ignition in large storage volumes
- Avoid mixing of different types of biomass fuels in one storage
- Avoid mixing of biomass fuels with different moisture content
- Avoid large parts of fines in the fuel bulk
- Measure and monitor the distribution temperature and gas composition within the stored material
- Prepare (large) silos for gas injection at the bottom of the silo in case a fire should occur
- Pellet storage units must be equipped with size dependent, appropriate means of ventilation control to remove carbon monoxide and carbon dioxide

In case a fire occurs it has to be noted that fire fighting procedures are difficult since water cannot be used in many cases, especially when pellets are stored in a silo. Pellets absorb moisture quickly and swell to about 3 to 4 times of their size, forming a cake like structure that can become very hard and is difficult to remove from the silo. The pellet expansion can in worst case result in a burst and collapse of the pellet silo. Self-heating occurs usually deep inside the bulk and the fire source is therefore difficult to reach.

Gases such as nitrogen and carbon dioxide and foams are usually the methods of choice to extinguish fires in pellet silos. Fire fighting operations, especially in large silos can be very complex and expensive operations. The technical research institute of Sweden (SP Sveriges Tekniska Forskningsinstitut) has published methods for extinguishing fires in wood pellet silos [17,18].

## 5.2 Off-gas formation and oxygen depletion

Biomass releases CO and CO<sub>2</sub> and oxygen is consumed in chemical oxidation processes and microbiological processes. CO and CO<sub>2</sub> are odourless toxins and can be lethal at low concentrations. Low oxygen concentrations can lead to suffocation of the handling personal when entering closed biomass storage without proper ventilation. Several death cases have been reported in connection with wood pellet storages during the last years both in large silos and container vessels but also in relatively small pellet storage in private homes. A closed biomass storage i.e. pellet storage room should never be entered before it has been ventilated with fresh air. CO and CO<sub>2</sub> are heavier than air and will accumulate at higher



concentrations at the bottom of the storage. Furthermore does biomass contains various different volatile organic compounds (VOCs) i.e. terpenes and terpenoids, esters, ethers and aldehydes. A lot of these VOCs can evaporate from the wood and in some cases they might accumulate in concentrations that may cause a health and safety hazard.

### 5.3

#### Dust formation

Handling of biomass can liberate significant amounts of dust. Especially dry biomass particles have often a low density and a high drag coefficient and can easily be dispersed in the air. Airborne dust particles pose a great risk to anyone coming into contact with them, mainly through inhalation. Dust can have different impacts on health, but the main effects of biomass dust are on the lungs and the respiratory system. The inhalation of an excessive amount of dust particles can result in irritation of the lungs, nasal and respiratory system. It can give raise to allergic reactions and severe illness such as cancer when exposed repeatedly over a longer period of time. Apart from that dust can irritate the eyes, causing sourness and conjunctivitis. There are clear limitations for dust exposure of working personal on national and international level. For Denmark the Danish Working Environment Authority (Arbejdstilsynet) can be contacted for further information.

The second great risk connected to biomass dust is the risk for dust explosion. Dust has a very large surface area compared to its mass. Ignition of biomass can only occur at the interphase between biomass and air and this causes dust to be much more flammable then bulk material. Depending on biomass type, size and shape of the particles, explosive suspensions can be formed at different mass to oxygen ratios. Those explosive mixtures can be ignited by electrostatic discharges, friction or hot surfaces and can result in fatal damage. There are strict regulations in place to prevent dust explosion accidents. In some cases it might be necessary to classify biomass handling processes according to the ATEX directive. For Denmark the Danish Technological Institute (Teknologisk Institut) can be contacted for further information and help regarding risk evaluation and safety procedures. Table 3 shows an example of the ignition/explosion properties of dust from wood pellets (white dust), bark pellets, coal and a fungi and the used testing standard [5]. The pellet handbook from Obernberger and Thek [5] should be consulted for further reading.

**Table 3.** Ignition and explosion properties of dust from wood pellets (white dust), bark pellets, coal and a fungi. Data taken from Obernberger and Thek [5].

| Test mode                 | Test parameter (dust < 63 µm)                    | Unit             | White dust | Bark dust | Coal dust | Lycopodium spores | Testing standards |
|---------------------------|--------------------------------------------------|------------------|------------|-----------|-----------|-------------------|-------------------|
| Dust cloud                | Auto-ignition Temp ( $T_c$ ) (Godbert-Greenwald) | °C               | 450        | 450       | 585       | 430               | ASTM E1491        |
|                           | Min Ignition Energy (MIE)                        | mJ               | 17         | 17        | 110       | 17                | ASTM E2019        |
|                           | Max Explosion Pressure ( $P_{max}$ )             | bar              | 8.1        | 8.4       | 7.3       | 7.4               | ASTM E1226        |
|                           | Min Explosion Pressure Rate ( $dP/dt_{max}$ )    | bar/s            | 537        | 595       | 426       | 511               | ASTM E1226        |
|                           | Deflagration index ( $K_{St}$ )                  | bar.m/s          | 146        | 162       | 124       | 139               | ASTM E1226        |
|                           | Min Explosible Concentration (MEC)               | g/m <sup>3</sup> | 70         | 70        | 65        | 30                | ASTM E1515        |
|                           | Limiting Oxygen Concentration (LOC)              | %                | 10.5       | 10.5      | 12.5      | 14.0              | ASTM E1515 mod    |
| Dust layer                | Hot Surface Ignition Temp (5 mm) ( $T_{5s}$ )    | °C               | 300        | 310       |           |                   | ASTM E2021        |
|                           | Hot Surface Ignition Temp (19 mm) ( $T_{19s}$ )  | °C               | 260        | 250       |           |                   | ASTM E2021        |
|                           | Auto-ignition Temp ( $T_{ai}$ )                  | °C               | 250        | 270       |           |                   | ASTM E2021        |
| Dust class - 10 to 200 µm |                                                  |                  | St 1       | St 1      | St 1      | St 1              | ASTM E2021        |
| Dust class - 20 to 200 µm |                                                  |                  | Class I    | Class II  |           |                   | CEMA CPL 00-05-05 |



#### 5.4 Biological hazards

Biomass is a natural product and as such a potential feedstock for different types of microorganisms i.e. fungi and bacteria. The risk of microbiological decay of the biomass depends on the biomass properties i.e. size and composition, moisture content and temperature. The major source of decay is caused by fungal infections. Fungi can digest the biomass and form large colonies commonly known as mould. Fungi produce toxins when growing on biomass i.e. mycotoxins and they can be released as dust into the air. Airborne fungal spores and toxins can cause irritations and allergic reactions along the respiratory system. Inhalation and direct contact should be avoided.

### 6 HANDLING OF WOOD PELLETS

Large amounts of wood pellets are transported by land and sea way, and the intercontinental trade of wood pellets is likely to increase by factor 10 within the next decade. It is therefore important to look on the overall risks involved in handling wood pellets. Mechanical forces during transportation of pellets cause fractures and breakage of the pellets, resulting in fines and dust. Although there are high quality standards (i.e. EN 14961-1) ensuring that pellet producers produce pellets with a high strength and abrasion resistance this problem cannot be eliminated completely. Especially pellets used in large scale applications such as heat and power plants are usually not following those standards. In those cases the quality standards are often agreed directly between the pellet producer and the large scale consumer. The mechanical durability of wood pellets is usually determined in a tumbler, simulating the impact forces that pellets experience during transportation. A standardized method exists to measure pellet durability, and this can be consulted for further reading (EN 15210-1).

To prevent the formation of fines and dust, handling should be as gentle as possible. The more handling steps the more degradation of the pellet. Important factors for handling are the drop height, elasticity of the impact surface and the number of times the pellets are dropped. Pellet degradation is a function of number of impacts and impact force (i.e. drop height) and they should be limited to a minimum to prevent dust and fines formation. There are many different ways of transporting pellets. The most common ways to move pellets from/to storage and transportation vessels are conveying and vacuum pumping. Especially large scale bulk handling of pellets exposes high mechanical load onto the pellets. This can be the case when loading pellets into an ocean vessel or into a large pellet silo at the producer/consumer site. Drop height are usually high (up to 25 m and more). It also has to be considered that pellets drop on each other and that a high weight load is exposed to the pellets lying in the bottom of the vessel/silo.

Pellet abrasion and dust formation takes place along the whole supply chain of the wood pellets from the pellet mill to the customer. Fines and dust formation during handling can occur during all of the steps during the supply chain. The most prominent ones are listed below:

- Conveying the pellets from the pellet plant to storage
- Packing of pellets i.e. big bags
- Conveying to transport vehicle
- Filling transport vehicle
- Discharge transport vehicle
- Conveying to another transport vehicle or to storage
- Filling into storage





Pellets are usually conveyed or transported by pneumatic pumps. The latter one might do severe damage to the pellets when the pressure (velocity of the pellets) is too high and if there are sharp turns in the transport pipe or potential impact sites for the pellets.

Pellet transport can take place either in trucks, trains or ships depending on the transport distance. Trucks are usually used to bridge short distances while trains are used for longer distance. Ship are used to transport large amounts of pellets either directly to the end customer or to a harbor where the pellets are unloaded and distributed to smaller transport vessels. A lot of large scale users are located close to the water so they can receive pellets by ship.

### **6.1 Loading and transport (in closed vessel)**

Large volumes of pellets from overseas are transported in ocean vessels. Especially on the trans-Atlantic route from Northern America to Europe bulk carriers are used. The size varies and is usually ranging from 1.500 to 50.000 deadweight tons (dwt) [5]. During shipping the pellets are kept dry under hatch covers with tight seals. To avoid the penetration of moisture into the storage compartment, ventilation is usually turned off. The storage of large amounts of pellets in a closed compartment on a ship is similar to the risk in a pellet silo and the same safety measures should be taken (see chapter 7). Trucks are used to transport small amount of pellets (up to 40 tons) to small scale customers. Pellets are loaded either as bulk or in bags. Bulk trucks are sometimes equipped with vacuum pump systems that allow pumping of the pellets and thus a comfortable way to transfer the pellets to a storage compartment. Rail cars and containers are also used for transport if available

### **6.2 Unloading and internal handling**

During receiving and internal operations, the risk of dust generation, ignition and explosion should be minimized. Special precautions should be taken to avoid increase of fines and wear during unloading and receiving pellets. The precautions generally should focus on avoiding over-heated or burning loads, spark detecting and fire extinction systems.

### **6.3 Conveying**

Conveying shall be conducted with a minimum of wear and damage to the solid biofuel. Fuel pellets, in particular, are very sensitive to physical wear and shall be handled with care. Precautions shall be taken to avoid moisture uptake in pellets. Minimal length of belt conveyor line should be applied and many crossings and high drops should be avoided, which raise the content of fines in a batch of pellets.

## **7 STORAGE OF SOLID BIOFUELS**

Due to seasonal fluctuations with periods of high demand (winter) and periods with moderate or low demand (summer months) pellet producers and intermediate traders need large storage space. Also consumers i.e. heat and power producers have a high demand for securing their energy supply and thus keep storage big enough to be able to deal with unforeseen bottlenecks and shortages of supply. Wood pellets are sensitive to moisture uptake and when exposed to rain they swell and lose their pellet structure. High moisture content also promotes microbiological decay and this can result in dangerous conditions such as self-heating and self-ignition. Wood pellets are therefore always stored indoors, either in flat



storages i.e. frames, storage halls or in silos. Indoor storage of biomass is a challenge with respect to self-heating of the biomass, dust formation and off-gassing of the biomass. A range of safety measures have to be taken to grant safety. Recent accidents have shown that improper handling of biomass can result in severe damages and risk for life and health of handling personnel.

## **7.1 Storage types**

### **7.1.1 Silo**

Silo storage is the most common way of storing pellets at power plants, pellet producers and harbors. Silos are consuming less space as storage halls and can be filled and emptied easily using screw conveyors. The size of the silo depends on its function. Large silos with several thousand cubic meter volumes are common as intermediate storage at harbors or at large scale pellet consumers. From there pellets are distributed to transport vessels, or feeding bins.

Large scale silos can be different in size and shape depending on the function and construction year. Typically older silos that have previously been used for agricultural products are high and have a small diameter. Newer silos that have been designed and built from wood pellets storage usually have a larger diameter compared to their height. In general there are two different types of pellet silos, silos with a tapered bottom and silos with a flat bottom.

Vertical silos with a tapered bottom can be emptied by gravity using a discharge tunnel and a conveyor. These type of silos are widely used to store agricultural products i.e. grains and are to some extent also used for pellet storage. Agricultural silos usually range from 50 to 10.000 m<sup>3</sup>. Dark colors and corrugated metal should be avoided since they increase heat absorption and lower heat transfer. Vertical silos with a flat bottom are emptied using a circulating auger for center feed to a discharge tunnel. They require less space due to their flat bottom and are therefore cheaper to build. However do they require more maintenance and take longer time to empty.

### **7.1.2 Flat storage**

Flat storage building i.e. A-frames, are used for bulk storage of pellets and are used for large storage of pellets in a range from 15.000 to 100.000 m<sup>3</sup>. They are used at the pellet producer's site, for intermediate storage at harbors and at the end users i.e. power plant site. Pellets are conveyed into the building and dropped down onto the floor forming a pile and/or moved by front loaders onto a pile. Emptying of this kind of storage is made by front loaders either into a feed system for a boiler (power plant site) or onto trucks, vessels or rail cars for further transportation. Especially moving pellets with a front loader bears the risk for fines and dust formation and as such a risk for health and dust explosion.

## **7.2 Self-heating and ignition risk**

Fires in wood pellet silos due to self-heating are not uncommon and several incidents have been reported during the last years. Also dust explosion incidents have been reported from several plants and facilities handling wood pellets. Fires and explosions can occur along the whole supply chain of wood pellet production and delivery and can take place in the production plant, transport vessel, transfer facilities and at the consumer site. However fires and explosions are not known to be a problem in the bagged pellets marked [5].

The sources of ignition can either be externally from sparks generated by metal pieces or stones coming in contact with the biomass or by overheating of motors, conveyer belts, bearings due to high friction. An accumulation of dust and fines due to improper maintenance and cleaning can increase the risk of fires and dust explosions. Measure to reduce these risk are control measures to



remove impurities i.e. stones and metal from the biomass, spark and heat detectors along the transport conveyors, extinguishing systems and fixed control schemes for checking the state of the conveyor belts and bearings to prevent overheating and removal of dust and other debris. The utilization of antistatic and fire resistant material as well as proper grounding of the transport conveyors can reduce the risk of external ignition too.

Pellets in a closed storage environment can heat up due to microbiological and/or chemical reactions. The bulk mass act as insulation and therefore heat is usually built up deep inside the bulk. Microbiological decay requires moisture and it is therefore usually a problem occurring when the moisture content of the biomass is too high or in case of water (rain) coming in contact with the biomass. Microbial decay results in a temperature increase in the stored fuel and peak temperatures of microbial self-heating can be up to 80 °C depending on the type of microorganism [19]. Chemical degradation usually starts to have influence at about 40 °C and at temperatures above 50 °C chemical degradation reactions will exceed the biological ones [19]. Due to poor heat transfer within the bulk mass and the insulating properties of biomass, heat is accumulated inside the bulks that can result in self ignition. The main factors affecting the temperature in a pellet silo are the ambient temperature, moisture content, moisture gradients, size of the bulk and density.

### **7.3 Monitoring of temperature, off-gasses and moisture**

Temperature in a pellet silo should be monitored continuously by sensors embedded in the stored product. An alternative and/or addition to direct temperature measurement can be equipment sensing carbon monoxide, hydrocarbons, radiated heat and smoke as precursors for overheating [5]. Even at low temperatures low temperature oxidation of pellets will result in the formation of carbon dioxide, carbon monoxide, aldehydes and methane and these gasses will deplete the oxygen in the silo. One option to cool and ventilate a pellet silo at the same time is to ventilate a storage silo whenever the ambient outside temperature is lower than the temperature inside the storage. In case of too high temperatures (> 80 °C) emergency procedures should be in place. This could be emergency discharge of the pellets by relocating them into a different storage or outside and thus breaking up the hotspots and cool the pellet bulk. In general the temperature in a pellet silo should be kept below 45 °C.

### **7.4 Safety measures for handling personnel**

Gasses formed in a close pellet silo are a threat for the life of handling personnel and therefore measures should be taken to avoid contact with handling personnel. This can be done by ventilation systems, gas monitoring, warning signs and strict working procedures when opening and entering a pellet silo.



## REFERENCES

- [1] VDI (2012) Emissionsminderung - Lagerung von Holzpellets beim Verbraucher - Anforderungen an das Lager unter Sicherheitsaspekten. VDI Guideline 3464. Verein Deutscher Ingenieure e.V., Düsseldorf, Germany, 22p.
- [2] DEPV (2011) Empfehlung zur Lagerung von Holzpellets. Deutscher Energieholz- und Pellets-Verband e.V., Berlin, Germany, 31p.
- [3] Nordtest (2008) Guidelines for storing and handling of solid biofuels. NT ENVIR 010. Nordic Innovation Centre, Oslo, Norway, 16p.
- [4] Svedberg U, Knutsson A. (2011) Faror och hälsorisker vid förvaring och transport av träpellets, träflis och timmer i slutna utrymmen. Kunskapsöversikt-Rapport 2011:2. Arbetsmiljöverket, Stockholm, Sweden, 46p.
- [5] Obernberger I, Thek G (2010) The pellet handbook – The production and thermal utilization of biomass pellets. Earthscan Ltd, London, UK, 549p.
- [6] Larsson SH, Lestander TA, Crompton D, Melin S, Sokhansanj S. (2012) Temperature patterns in large scale wood pellet silo storage. *Applied Energy*, 92:322-327.
- [7] Kuang X, Shankar TJ, Bi XT, Sokhansanj S, Jim Lim C, Melin S (2008) Characterization and kinetics study of off-gas emissions from stored wood pellets. *Annals of Occupational Hygiene*, 52(8):675-683.
- [8] Svedberg U, Samuelsson J, Melin S (2008) Hazardous off-gassing of carbon monoxide and oxygen depletion during ocean transportation of wood pellets. *Annals of Occupational Hygiene*, 52(4):259-266.
- [9] Svedberg URA, Högberg HE, Högberg J, Galle B (2004) Emission of hexanal and carbon monoxide from storage of wood pellets, a potential occupational and domestic health hazard. *Annals of Occupational Hygiene*, 48(4):339-349.
- [10] Smith MA, Glasser D (2005) Spontaneous combustion of carbonaceous stockpiles. Part II. Factors affecting the rate of the low-temperature oxidation reaction. *Fuel* 84(9):1161-1170.
- [11] Pauner MA, Bygbjerg H (2007) Spontaneous ignition in storage and production lines: investigation on wood pellets and protein powders. *Fire and Materials* 31(8):477-494.
- [12] Jian F, Jayas DS, White NDG (2009) Temperature fluctuations and moisture migration in wheat stored for 15 months in a metal silo in Canada. *Journal of Stored Products Research* 45(2):82-90.
- [13] Gauthier S, Grass H, Lory M, Krämer T, Thali M, Bartsch, C (2012) Lethal carbon monoxide poisoning in wood pellet storerooms-two cases and a review of the literature. *Annals of Occupational Hygiene*, 56(7):755-763.
- [14] He X, Lau AK, Sokhansanj S, Jim Lim, C, Bi XT, Melin S (2012) Dry matter losses in combination with gaseous emissions during the storage of forest residues. *Fuel* 95:662-664.
- [15] Pa A, Bi XT (2010) Modeling of off-gas emissions from wood pellets during marine transportation. *Annals of Occupational Hygiene* 54(7):833-841.
- [16] Kuang X, Shankar TJ, Sokhansanj S, Lim CJ, Bi XT, Melin S. (2009) Effects of headspace and oxygen level on off-gas emissions from wood pellets in storage. *Annals of Occupational Hygiene* 53(8):807-813.
- [17] Persson H, Blomquist P (2004) Släckning af silobränder, SP Sveriges Tekniska Forskningsinstitut, 2004:16, Borås, Sweden



[18] Persson H, Blomquist P (2009) Silo fires and silo fire fighting. In: Proceedings of bioenergy 2009, pp. 693-702, Jyväskylä, Finland

[19] Kubler H (1987) Heat generating processes as cause of spontaneous ignition in forest product. Forest Products Abstracts 10(11):299-327.



# INSIGHTS

## PERSPECTIVES

### CLIMATE

## Are wood pellets a green fuel?

A return to firewood is bad for forests and for the climate

By William H. Schlesinger

**J**ames Watt's steam engine vaulted coal to its major role as a fuel for the Industrial Revolution. Today, about 40% of the world's electricity is generated in coal-fired power plants, consuming more than 80% of the coal mined each year. Because combustion of coal produces carbon dioxide (CO<sub>2</sub>) and other air pollutants, efforts to combat cli-

mate change have now turned to seeking alternatives to coal. Natural gas is cleaner and less expensive but, like coal, returns fossil carbon to the atmosphere. Recently, attention has focused on woody biomass—a return to firewood—to generate electricity. Trees remove CO<sub>2</sub> from the atmosphere, and burning wood returns it. But recent evidence shows that the use of wood as fuel is likely to result in net CO<sub>2</sub> emissions and may endanger forest biodiversity.

In recent years, ~7 million metric tons of wood pellets per year have been shipped from the United States to the European

Union (EU), where biomass fuels have been declared carbon neutral and are thus considered to count toward fulfilling the commitments of the Paris Agreement. The EU aims to generate 20% of its electricity by 2020 using renewable sources, including burning woody biomass. In part to revive a languishing forest products industry, the U.S. Congress may also declare wood a carbon-neutral fuel. Despite its withdrawal from the Paris Agreement, the United States may see a few utilities switch from coal to wood, which costs roughly the same as natural gas. The switch could be further incentivized with a carbon tax on fossil carbon (1).

Cutting trees for fuel is antithetical to the important role that forests play as a sink for CO<sub>2</sub> that might otherwise accumulate in the atmosphere. Each year, an estimated 31% of the CO<sub>2</sub> emitted from human activities is stored in forests (2). However, managed forests store less carbon than their

Cary Institute of Ecosystem Studies, Post Office Box AB,  
Millbrook, NY 12545, USA. Email: schlesingerw@caryinstitute.org





Young loblolly pines are harvested in the southeastern United States.

plantations achieve a maximum biomass of 125 metric tons per hectare in about 40 years (7). But because this species achieves its maximum rate of biomass accrual in about 20 years, rotations are usually kept short to maintain the fastest carbon uptake possible. Thirty-four operating and proposed wood-pellet plants dot the landscape of the Southeast, each anticipated to receive logs from the region within an 80-km radius. Maine and the Canadian Maritime provinces also eye the potential for wood pellets to revitalize their forest products industries; most of this wood would derive from natural forests and not plantations.

It is not only the burning of wood that adds CO<sub>2</sub> to the atmosphere. Making wood pellets and shipping them to Europe can account for about 25% of the total carbon emitted to the atmosphere from the use of wood pellets in European power plants (8). Carbon neutrality for wood is only achieved if the areas that are harvested are allowed to regrow such that they store more than their original biomass. Furthermore, the benefits of wood power must be discounted by the loss of the carbon sequestration that would have occurred in the original forests if they had not been harvested (6).

Although the carbon uptake by southeastern forests is greatest at about 20 years, regrowing stands continue to have lower biomass than unharvested stands for 40 to 100 years (9, 10). Rotation lengths of less than 40 years seem certain to transfer carbon from biomass to CO<sub>2</sub> in the atmosphere. By contrast, nonwoody biomass fuels such as switchgrass or silvergrass (*Miscanthus*) regrow within a year, balancing the emissions from their combustion to their subsequent uptake of CO<sub>2</sub> through photosynthesis. With wood, there is the assumption—but no guarantee—that new trees will be planted and will persist long enough to pay back the carbon debt created by burning the previous stands. If that carbon stock is not restored, burning wood may actually emit more CO<sub>2</sub> to the atmosphere than burning coal (10).

Much of the argument about the carbon neutrality of wood power centers on the time frame of analysis. Because CO<sub>2</sub> persists for many decades in the atmosphere, some scientists argue that CO<sub>2</sub> emitted to the atmosphere does not contribute substantially to global warming in intervals less than a century (11). Others hold that all CO<sub>2</sub> molecules in the atmosphere exert the same effect and that plantation rotations of less than 20 years make a substantial net contribution to global warming. Ocko *et*

*al.* (12) argue that the impacts on warming should always be reported for both 20- and 100-year periods, so that policy-makers can understand the net CO<sub>2</sub> emissions that are associated with the time horizon of different policy options. Full international participation is paramount; it makes no sense to have Europeans embracing wood pellets as carbon neutral, thereby overlooking the CO<sub>2</sub> emitted during shipment and the losses of carbon stock from forests harvested outside Europe. This is another example of exporting CO<sub>2</sub> emissions beyond the border (13).

Many environmental economists believe that the increased value of forests for wood-pellet production will ensure that more forests are planted (14); when trees have little or no value, the landscape is more likely to succumb to commercial or residential development. But in the southeastern United States, these forests are most likely to be pine plantations, which are of limited value for the preservation of its rich regional biodiversity. Furthermore, increased demand for wood pellets can raise the price of raw wood, diverting harvest to old-growth forests, which are important areas for biodiversity.

Biodiversity losses in the southeastern United States mostly result from land clearing (15), and agricultural clearing during the past two centuries likely already had great impacts on biodiversity. Following agricultural abandonment in the early 20th century, forests are now more widespread but are mostly pine plantations with low biomass and low diversity. Ultimately, the question is what kinds of forests are most desirable for the future. Unless forests are guaranteed to regrow to carbon parity, production of wood pellets for fuel is likely to result in more CO<sub>2</sub> in the atmosphere and fewer species than there are today. ■

## REFERENCES

1. P. Dwivedi, M. Khanna, *Glob. Change Biol. Bioenergy* **7**, 945 (2015).
2. W. H. Schlesinger, E. S. Bernhardt, *Biogeochemistry: An Analysis of Global Change* (Elsevier, ed. 3, 2013).
3. K.-H. Erb *et al.*, *Nature* **553**, 73 (2018).
4. K. C. Kelsey *et al.*, *Carbon Balance Manag.* **9**, 6 (2014).
5. S. V. Hanssen *et al.*, *Glob. Change Biol. Bioenergy* **9**, 1406 (2017).
6. M. T. Ter-Mikaelian *et al.*, *J. Forestry* **113**, 57 (2015).
7. P. M. Schifman, W. C. Johnson, *Can. J. For. Res.* **19**, 69 (1989).
8. A. L. Stephenson, D. J. C. Mackay, *Life Cycle Impacts of Biomass Electricity in 2020* (U.K. Department of Energy and Climate Change, London, 2014).
9. J. G. G. Jonker *et al.*, *Glob. Change Biol. Bioenergy* **6**, 371 (2014).
10. J. D. Sterman *et al.*, *Environ. Res. Lett.* **13**, 015007 (2018).
11. J. K. Shoemaker *et al.*, *Science* **342**, 1323 (2013).
12. I. B. Ocko *et al.*, *Science* **356**, 492 (2017).
13. K. Kanemoto *et al.*, *Environ. Sci. Technol.* **50**, 10512 (2016).
14. C. S. Galik, R. C. Abt, *Glob. Change Biol. Bioenergy* **8**, 658 (2016).
15. S. Martinuzzi *et al.*, *Ecol. Appl.* **25**, 160 (2015).

10.1126/science.aat2305

native counterparts (3), and harvesting of native forests will therefore be a source of, not a sink for, atmospheric CO<sub>2</sub>. Furthermore, wood contains less energy than coal, and wood burning thus generates higher CO<sub>2</sub> emissions per kilowatt of electricity. The CO<sub>2</sub> emissions from burning wood offset CO<sub>2</sub> that might otherwise be emitted from fossil-fuel combustion (4, 5), but full carbon accounting must also consider how long it takes to restore the carbon pool of forested land that has been converted to atmospheric CO<sub>2</sub> (6).

The large-scale abandonment of agricultural activities during the Great Depression (1929 to 1939) led to a rapid expansion of mostly natural forests across the southeastern United States. Later, these natural stands were replaced by plantations of loblolly and slash pine, which were the favorites of the forest products industry because they grow well in the warm, wet climate of the Southeast (see the photo). Loblolly pine

# Carbon Monoxide (CO) HAZARDS

## from Wood Pellet Storage

Heating with wood can be an excellent way to keep your home or business warm. When heating with wood pellets, it is important that they be safely stored outside your home or business. If you use a woodstove, pellet stove, hydronic heater, boiler, or fireplace, the devices must be properly installed, vented, and serviced regularly to avoid potentially hazardous situations.

A chemical reaction that produces carbon monoxide (CO) gas can occur when wood pellets are stored. CO is a poisonous gas that can cause death and other harmful health effects if the pellets are not safely stored. It is invisible, tasteless, odorless, and non-irritating. The early symptoms of poisoning can be confused with a flu-like illness.

To minimize the risks of carbon monoxide poisoning, wood pellets should be safely stored in a separate structure outside your home or business. The outbuilding should have ventilation to the outside and any pellet delivery openings should not allow access to children. Signs should be posted at the storage area to warn everyone about potential carbon monoxide hazards.

Visit **[www.health.ny.gov](http://www.health.ny.gov)** for more information.



*Wood pellets should be stored in an outbuilding with hazard signs.*







## What is carbon monoxide?

Carbon monoxide (CO) is a poisonous gas that can cause death and other harmful health effects. It is invisible, tasteless, odorless, and non-irritating. It is usually produced from burning fuels such as wood, oil, natural gas, propane, gasoline, and kerosene. Stored bulk wood pellets are another source of carbon monoxide so it is important to safely store pellets outside your home or business.

## Symptoms of CO poisoning

Symptoms can be flu-like: nausea, headache, dizziness, shortness of breath, sleepiness, weakness, chest tightness, and confusion. In large amounts, CO can cause rapid loss of consciousness, brain damage, or death.

## If you suspect CO poisoning

Get outside into the fresh air, open all windows and doors as you leave, and call the fire department from outside of the building.

Call 911 if you or someone else is experiencing symptoms or take the ill person to the emergency room. Tell the physician that you suspect CO poisoning.

## Install CO alarms in your home

In New York State, Amanda's Law requires that CO alarms be installed in all homes (single and multifamily) that have any fuel-burning appliance or system. Alarms must be installed on each story where a sleeping area or a CO source is located. Carefully follow manufacturers' instructions for installation, maintenance, and battery/unit replacement.

## For more information

Contact the New York State Department of Health's Bureau of Toxic Substance Assessment at 518-402-7800 or toll-free at 1-800-458-1158, or visit [www.health.ny.gov](http://www.health.ny.gov) for more information about health concerns from carbon monoxide.

Visit [nyserdera.ny.gov/renewableheatny](http://nyserdera.ny.gov/renewableheatny) for more information on the benefits of high-efficiency, low-emission wood heating systems and participation details for NYSEDA's Renewable Heat NY programs.

/ WHAT'S HOT /



Trump Pushes For Total Immunity — Including For Events That ‘Cross The Line’



Maggie Haberman Shares Details Of Trump’s Recent Phone Call To Her



Steve Bannon Loses It After Mike Johnson Says Biden Presidency Is ‘God’s Will’



Ex-Trump Attorney Spots ‘Embarrassing’ Courtroom Moment For Trump Legal Team

[Support Us](#)

[ENVIRONMENT](#) [CLIMATE CHANGE](#) [POLLUTION](#) [MISSISSIPPI](#)

# A ‘Green’ Energy Project Leaves A Mississippi Town Gasping For Air

European climate subsidies funnel billions to wood-burning power plants that harvest trees from the U.S. South. The industry is taking a toll locally and globally.

By Alexander C. Kaufman

Dec 18, 2021, 05:45 AM EST

Updated Dec 20, 2021

289 COMMENTS





Blackmon Hole, a neighborhood of trailers in Gloster, Mississippi, sits next to the Drax Biomass production facility in the town. Local residents are fighting the plant, which they say is making them sick with its pollution.

TIMOTHY IVY FOR HUFFPOST

GLOSTER, Miss. — Carmella Wren-Causey knew something was wrong as soon as she returned to her hometown last year, a place where she'd slept on her grandmother's screened porch to smell the sweet, crisp fragrance of longleaf pines on summer evenings. Though it had been years since Wren-Causey, 60, had smoked her last cigarette, she was having a harder and harder time breathing.

Within months of moving into a small, prefabricated home on property her great-grandparents first bought nearly a century ago, even just tending her garden left her so dizzy she felt faint. Dragging the garbage the short walk up to the road required at least three breaks to catch her breath. Hoisting herself into her Nissan pickup became a process: one leg, a gargled inhale, a lean, then the other leg. She could barely sleep at night and recently started going to bed hooked up to an oxygen tank.

She had struggled with breathing problems before. But now her doctor had to increase her medication. She joked that her inhaler had become her best friend. When her two beloved spunky pugs Rayray and Tiny – her “babies” she took everywhere – died suddenly, just three weeks apart, it became a little too true. The dogs had also struggled to breathe, wheezing with anguish shortly before dying.

“The truth is, you got people around here that stay sick. You got people around here that has to use asthma pumps that didn’t have respiratory problems before,” Wren-Causey said, weeping.

“I go to bed, my lungs hurt,” she said. “I wake up, my lungs hurt. It’s horrible.”

Wren-Causey lives less than a mile from the mill where the British utility giant Drax turns towering tree trunks into wood pellets the size of vitamin capsules, which are then shipped to the United Kingdom to be burned in power plants. When the company opened the mill here eight years ago, tiny Gloster, with its shrinking population of about 800, became part of the \$52 billion global supply chain for wood-fired electricity. The industry is on pace to [grow 6%](#) or more per year this decade.

To some lifelong residents of Gloster, the Drax plant was a godsend, the first sign of life since 2002, when the lumber mill that was once the town’s economic heart closed and left a once-thriving main street a ghost town.

To others, the facility was a curse. Feeding it meant reducing local forests that once teemed with deer and squirrels to plantations of wimpy saplings. And many in this mostly Black community, where median incomes barely hit \$10,000 a year, say it has polluted the air with disease-causing gases called volatile organic compounds without delivering them promised new jobs.





Carmella Wren-Causey is one of many residents of Gloster, Mississippi, who says that pollution from the local Drax Biomass plant is making them sick.

TIMOTHY IVY FOR HUFFPOST

Perhaps counterintuitively, the push to build the Drax mill and feed it with Southern forests is the product of policies meant to stop global warming.

European Union and British regulators decided that emissions from wood-fired power plants would not count the same as pollution from fossil fuel generators, making companies like Drax eligible for billions in subsidies for green energy. The firm received [nearly \\$1.1 billion](#) in clean power subsidies last year alone.

Seeing how quickly the industry grew off government funding meant to cut emissions, scientists and activists mobilized to stop its expansion, complaining that the whole thing was built off faulty premises: Trees regrow, but it takes decades to centuries, and burning wood can release more planet-heating gases than coal because you need much more to generate the same amount of power. But it was too late: A multi-billion-dollar industry had already put down roots and cultivated powerful political allies.



In the U.S., federal incentives to build wood-burning power plants are much smaller, and their share of the country's electricity generation has declined over the past seven years. But states, particularly in the South, have lavished tax breaks on firms that harvest and process wood to send it across the ocean. And the industry has boosters inside the Biden administration [such as Agriculture Secretary Tom Vilsack](#) and a spurious but catchy new sales pitch promising that new technologies will render it capable of pulling more carbon from the atmosphere than it emits.

“When the industry claims it's carbon neutral, it's saying we recognize there's CO<sub>2</sub> coming out of the smokestacks, but it was instantaneously offset by CO<sub>2</sub> uptake somewhere else, and therefore it's not in the atmosphere,” said Mary Booth, an ecologist and founder of the Partnership for Policy Integrity, an environmental research and advocacy nonprofit. “But that's not what's happening. If you burn a tree, it emits carbon right away. And if you grow a tree, it takes up carbon over a long time.”



Drax Biomass, a multinational woodchip production company, operates a facility in Gloster that produces woodchips for the British heating market. Local residents are at odds with each other over the plant, which some say is making them sick, while others support the economic stability provided to local loggers who sell to the plant.

TIMOTHY IVY FOR HUFFPOST

## Could Or Should Wood Be A Climate Solution?

Burning plant matter for energy predates even *Homo sapiens*, as [studies](#) show earlier species of hominids used it for fire. But the modern biomass industry, which burns plants or plant-based synthetic fuels to power generators and produce power, did not gain prominence until the 1970s, as the oil crisis spurred interest in alternatives to fossil fuels.

The wood-fired power sector really started booming in the second decade of the 21st century. The United Nations' Intergovernmental Panel on Climate Change had, for decades, advised countries to attribute carbon from chopping down trees to the land-use sector, not energy, to avoid double counting. That meant countries didn't have to report the emissions from wood-burning power plants as part of their overall carbon footprint.

There were various justifications for doing so that [have shifted wildly](#) over the years. But one of the more straightforward, if perhaps too ecologically simplistic, explanations was this: Scrap wood or dead trees left to rot would emit carbon anyway, so turning that biomass into fuel that could supplant fossil fuels would balance out the atmospheric pollution ledger.

In reality, it set the stage for creating an accounting convention that would allow some of the richest nations that contributed the most to the cumulative carbon mess in the atmosphere to boost their struggling timber industries and inflate their green bona fides.

The methodology reflected the long-standing view in Europe, where wood-burning furnaces and stoves are common, that wood was a renewable resource. So when the European Union adopted its 2009 Renewable Energy Directive — a plan to reach 20% renewable energy by 2020 to help the bloc adhere to the world's first climate treaty, the Kyoto Protocol — it followed a long tradition of giving wood-fired power plants the same emissions-free status as wind and

solar. As a result, coal-dependent countries like Britain and Germany began heavily subsidizing wood burning.

**“If you burn a tree, it emits carbon right away. And if you grow a tree, it takes up carbon over a long time.”**

- Mary Booth, ecologist and founder of the Partnership for Policy Integrity

This was despite the fact that burning freshly cut wood chips, which are wet and far less energy-dense than fossil fuels, can emit between 40% and 60% more carbon per megawatt-hour of electricity than coal. Wood pellets like those the Drax plant produces are dried and therefore more efficient, and generate fewer emissions when they're burned despite spewing more gases where they're produced.

“Sustainable biomass is renewable because of the closed carbon cycle created when trees grow and take CO<sub>2</sub> from the atmosphere. Whether the wood is used for bioenergy or these trees naturally decompose, the same amount of CO<sub>2</sub> is released into the atmosphere,” said Ali Lewis, a Drax spokesperson, in a lengthy email. “The cycle remains in balance because the working forests which supply the low-grade wood used for biomass are replanted and these growing trees absorb more carbon.”

The problem, the industry's critics say, is that cycle's timeframe. It takes at least 82 years for a biomass plant's regrown forests to lower that facility's carbon footprint to that of a coal plant. And that's the best-case scenario outlined by a [peer-reviewed emissions calculator](#) tool created by Natural Resources Canada, a government agency. Even after 100 years, wood-fired electricity could not close the emissions gap with a natural gas plant, the calculator data show.

Yet by the time this became clear enough to build some kind of political momentum, biomass had not only grown into an industrial heavyweight, it had split the traditional green voting bloc in the EU, attracting support from the usually climate-conscious Scandinavians who also have large timber industries.



The reporting metric also allowed Europe to credit its existing wood-burning operations as renewable energy, effectively juicing its green energy numbers to make the continent look much more ecologically balanced than it actually was.

Biomass had an extra appeal that has become a more prominent industry talking point in recent years. Unlike wind and solar, which can operate sporadically, wood-fired plants can run as long as there's something to burn, providing the reliable baseload electricity we expect from fossil fuels.

The EU embraced wood at the same time the U.S. leaned into the Northeast's hydraulic fracturing boom and replaced its coal plants with cheap and abundant natural gas. This presented an opportunity for states across the forested South to revive the timber industry, [then on the decline](#), by welcoming companies that would feed Europe's growing appetite for pellets.

Gloster's Drax plant became one of the largest pellet mills in the U.S. when it opened eight years ago.



Blackmon Hole, a neighborhood of trailers, sits next to the Drax Biomass production facility.

TIMOTHY IVY FOR HUFFPOST

## Air You Can Taste

In 2013, when wood pellet exports from the U.S. doubled from the previous year to 3.2 million tons, Drax chopped down the pines and oaks that once covered the hill behind Blackmon Hole, a small Black-owned trailer park five minutes from downtown Gloster.

“I used to go hunting up there,” said Pete, a Blackmon Hole resident who declined to give his last name as he sipped a Bud Lite and tinkered with a new transmission in an old gray Ford Crown Victoria. “Now ain’t nothing coming around with all that noise.”



On that late Wednesday afternoon in early December, the maze of towering metal chutes that make up the mill was clanking and humming, a cacophony occasionally joined by the roar of semi-trucks carrying flatbeds of pine logs. A grayish-white cloud billowed from a smokestack.

Air pollution from wood pellet plants comes from various sources. There's the exhaust from a steady convoy of trucks. And, perhaps worst of all, the kiln that dries chipped trees to turn them into wood pellets, spewing loads of volatile organic compounds, or VOCs, that contribute to smog and ozone pollution; aggravate asthma and other lung conditions; cause cancer; and trigger itchy eyes and skin. In between, too, there are additional VOCs sent into the air when the hammermills shred trees and the pellets are fully processed.

The wood pellet industry and regulators almost never account for that pollution in permitting, according to a [landmark 2018 study](#) by the Environmental Integrity Project, a watchdog group.



Left: Wood chips from the Drax Biomass production facility litter the roadside in Gloster, Mississippi. Right: Drax Biomass, a multinational woodchip production company operates a facility in Gloster that produces woodchips for the British heating market.

TIMOTHY IVY FOR HUFFPOST

In the middle of the gravel driveway that cuts through Blackmon Hole is a yellow sign that reads: "Slow: Children Playing." Once school let out, at least half a dozen kids chased each other around the lawn between the trailers.

Heading up the hill toward the chainlink fence between the homes and the Drax facility, the air takes on a sharp, peppery flavor. It stung the inside of my nostrils before the smell even registered. My eyes watered and I sneezed; later on, my lungs felt heavy, like an occasional smoker might feel after a rare cigarette.

Jasmine Jenkins lives at the edge of the park, with her daughters, 8 and 3, and her son, 5.

“They’ve had allergies ever since they were born,” Jenkins, 28, said while standing on the steps of her home one night after returning from work. “One of my kids breaks out in hives every two to three months.”

Several feet away stood her neighbor Shirley Bland, who, after 30 years living here, said she only started finding a daily layer of residue on her car once the plant opened.

“It must be what they put up in the air,” said the 57-year-old grandmother. “I keep feeling out of breath.”

The Environmental Integrity Project report found that Drax’s plant was emitting more than three times as many VOCs as the company was legally permitted to emit.

Last fall, the Mississippi Department of Environmental Quality fined Drax \$2.5 million and demanded the company install new catalyzing technology to help disintegrate more of the pollution before it enters the atmosphere. An agency spokesperson [sent a link](#) to the fine but did not respond to HuffPost’s questions about whether Drax had fully fulfilled the regulators’ demands.

Drax declined my request to visit the plant but said it installed catalytic oxidizers in Gloster and two plants in Louisiana this past summer.

It was the highest fine any wood-pellet plant in the U.S. has incurred, according to the Dogwood Alliance, a North Carolina-based nonprofit that advocates against expanding the biomass industry. But such penalties are not widely publicized, particularly by the states promoting the industry, making it difficult to confirm. It took months for watchdog groups that track the industry, including Dogwood Alliance, to put out a press release about the fine.

Organizers from the Dogwood Alliance came to Gloster in June to hold a town-hall meeting with residents. Upward of 80 people showed up, many complaining about breathing and skin problems.

The gathering drew backlash from local officials. In a post on Facebook, Mayor Jerry Norwood warned that rabble-rousing could drive Drax out of town and take its purchasing power, which helped offset the cost of water, gas and electricity in Gloster, with it.

“If by some chance a big lawsuit should happen and Drax decides to close [its] gates please be prepared for your utility rates to triple,” Norwood wrote.



Erniko Brown, regional partnership engagement manager of the Dogwood Alliance in Asheville, North Carolina, is working with residents of Gloster against Drax.

TIMOTHY IVY FOR HUFFPOST

The warning seems to have resonated. When organizers Erniko Brown and the Rev. Michael Malcom returned months later, about four people came to their information session, expressing fear about their bills going up.

“It’s bullying,” said Malcom, a pastor and environmental justice advocate in Birmingham, Alabama. “I *hate* a bully. And that’s what this is.”

The turnout to the activists’ Dec. 3 town hall meeting was higher, with about a little over a dozen attendees. But at least six of them, including the mayor, came to express concerns that the campaign against Drax threatened Gloster’s economic future.

"I've been a Gloster resident all my life. I grew up here. And I don't want my town to go to dirt," said Cissy Fenn, 68, a former school teacher.

Brandy Hamilton, one of the Dogwood Alliance's lead organizers, said her group had no intention of shutting down Drax and told Fenn to lower her voice, asking her to be "mindful that everyone has high emotions."

"You've been in Gloster all your life," she told Fenn, who is white. "I've been Black all my life."

Fenn looked shocked by the implication that racism had anything to do with the Drax plant. Her husband, Reggie Fenn, 67, spoke up: "Look, we all bleed red."

"We all have things that make us sensitive to things," Hamilton said.

"It's not a Black and white issue at all for me," Cissy Fenn said. "It's survival for us."

"It's survival for everybody," Hamilton replied.

Doug Iverson, who once ran a mill that turned grain into feed pellets for livestock, asked Hamilton where she was from. She told him Charlotte, North Carolina. He questioned how the air here could be worse than in such a big city.

"You know, I grew up in this little town, and there was always dust around," he said. "Once a week I had to dust every piece of furniture you could wipe your hand on."

"I know you're not dusting the houses over in Blackmon Hole," Hamilton said.



Once Norwood, the mayor, joined in, the argument quickly devolved into shouting. Reggie Fenn walked out, then Iverson. Brown, pulling rank, asked her colleague Hamilton to leave and cool off.

Jerry White, 75, the president of the local chapter of the National Association for the Advancement of Colored People, said he doesn't think "race was the main issue," but hoped Drax would take additional steps to reduce pollution and help those living in Blackmon Hole.

"We can still find common ground," he said, visibly drained after the meeting. "I'm trying to look forward to the future. I think about the children, especially in Blackmon Hole."



Jerry White, president of the local NAACP in Gloster, is helping to organize residents who say they were harmed by Drax's pollution.

TIMOTHY IVY FOR HUFFPOST

On another evening this month in Blackmon Hole, Brown stopped Bland's grandson — the only person that anyone in or near the trailer park seemed to know who had gotten a job with Drax, working as a janitor — as he drove his car away from his grandmother's trailer. Brown confronted him about the air pollution.



"To me, it could be pollen," said Bland's grandson, who declined to give his name.

"This ain't pollen season," Brown said, gesturing to the silhouette of the plant in front of a pink dusk sky. "We know where it comes from."

## Health vs. Wealth

Others in the community have sought employment at the plant, but say they were repeatedly rejected.

"They said people could get jobs there, but I keep putting in applications and I don't get no job," said Debra Blackmon-Butler, 61, who is related to the families living in Blackmon Hole but lives about a mile away. Instead she drives to Baton Rouge for work, more than an hour south.

In an interview after the heated debate at the town hall, Mayor Norwood said those complaining about the plant were probably unqualified to work there and accused them of trying to extort Drax for money.

"This is a very uneducated town," he said outside the meeting. "They were talking about the number of people from Gloster that work at Drax. But has anybody asked them how many of them can pass a drug test? You have to be drug-tested to get a job there."

Drax said one-fifth of its 63-person workforce at the facility lives in Gloster.

Drax, he said, has helped keep this tiny town afloat. The company paid "almost half a million dollars" to the school district this year, and paid nearly \$83,000 for gas, providing the town a surplus that prevented it from raising utility rates when the price of natural gas spiked this fall, the mayor said. Drax did not confirm how much it pays in utilities but said its local taxes amount to about \$1 million and listed a series of regional charities and schools to which it donates.

"Where do we get this environmental racism from, and why is that always the narrative? Why isn't it that these companies picked this poor town and tried to help?" said Norwood, who is Black. "That's all I've seen them do."

He said he has talked to another timber-related company about restarting another mill that first closed 19 years ago when Georgia-Pacific left town (the manufacturing giant briefly reopened the lumber plant in 2005 to help process wood debris from Hurricane Katrina, then shuttered for good in 2008).

If Gloster's reputation is as a place with "Black-white racial issues," Norwood said, "they're gonna say there's no way we're coming down with this foolishness going on."



Gloster, located just over 50 miles north of Baton Rouge, Louisiana, is, like many towns in Mississippi: economically depressed.

TIMOTHY IVY FOR HUFFPOST

Attracting companies to Gloster, a town in one of just two Mississippi counties without the four-lane highways trucks need to get products to market, does come at a price, Norwood admitted. Drax received a 10-year tax break from both the town and county. Such incentives are typical for municipalities trying to lure corporations, but they have [yielded unfavorable outcomes](#) once the credits end and the corporation relocates.

Drax declined to say whether it would consider leaving town after the tax deal expires, but noted it plans to dramatically increase its production in the coming years.

Norwood said that, even if Drax leaves after another few years, “they still would have helped the town.”

Yet the company could end up causing an exodus, too. After years of taking her now-teenage daughter to a clinic for allergy shots every Thursday, Chiquita Cain, 33, moved last month to Baton Rouge, where she’s closer to work and further from the environment she said has sickened her kids and left her with constantly irritated skin.

“It’s just itchy all day, every day,” Cain said. She said she wasn’t alone: “My cousin has asthma real bad. My mom has bronchitis. My sister gets bad, bad headaches, so bad she needed to see a neurologist.”

Robert Weatherspoon, 64, broke into tears describing how it takes him an hour and a half each morning to clear the mucus from his chest.

“You’re coughing, you’re coughing, you’re coughing, like something hanging up there,” he said. “I thought I’d get used to the pain. But every morning, honest to God, I don’t think I’m going to make it.”



Drax was recently fined \$2.5 million by the state of Mississippi for releasing more pollution than allowed by law.

TIMOTHY IVY FOR HUFFPOST

## Bullish Or Bullshit On ‘Negative Emissions’

While U.S. exports of wood pellets have roughly doubled since 2014, the amount of electricity Americans generated from wood has fallen steadily [since peaking](#) that year. Today, biomass makes up just over 1% of U.S. electricity.

The largest wood-burning power plant in the U.S. opened in Gainesville, Florida, in 2013, and almost immediately caused a public scandal over costs. The deal to buy power from the 103-megawatt Deerhaven Renewable Generating Station proved so controversial —



at roughly \$70 million per year over three decades, electricity bills quickly rose – that the city spent \$750 million to buy out the remainder of the contract.

In the U.K., by contrast, the 4,000-megawatt Drax Power Station — a massive coal- and wood-burning complex in northeastern England — supplies about 7% of the U.K.'s electricity with millions of tons of wood, much of which comes from forests in the American South.

This week, Drax [unveiled](#) plans to spend over \$53 million to start work on new carbon capture machines that the company said will catch and store 8 million metric tons of CO2 per year. Already, the company calls its plant the “largest decarbonization project in Europe” because it had swapped much of its coal-fired production for wood.

The investment news came just a few months after Drax [announced](#) a deal with the U.S. engineering firm Bechtel on projects that would equip wood-burning power plants across North America with carbon capture technology.

Will Gardiner, Drax's chief executive, said the deals demonstrate “Drax's commitment to deliver a vital technology which is urgently needed to address the climate crisis.”

“It's no longer enough to reduce emissions,” he said in a statement. “The world has got to start removing carbon from the atmosphere if we are to avert this climate crisis.”



Aerial view of Drax Power Station, the third-most [polluting power station in Europe](#), located close to Selby, North Yorkshire, England.

EDWARD CRAWFORD/SOPA IMAGES/LIGHTROCKET VIA GETTY IMAGES

Since trees suck up huge amounts of carbon naturally, Drax and others in the industry say that equipping their plants with technology to capture carbon dioxide from smokestacks and store it underground will make biomass power a potential source of negative emissions. As governments set net-zero targets — points at which the amount of carbon their countries absorb equals or

exceeds the CO<sub>2</sub> they emit — demand for quantifiable ways to pull carbon from the atmosphere is growing.

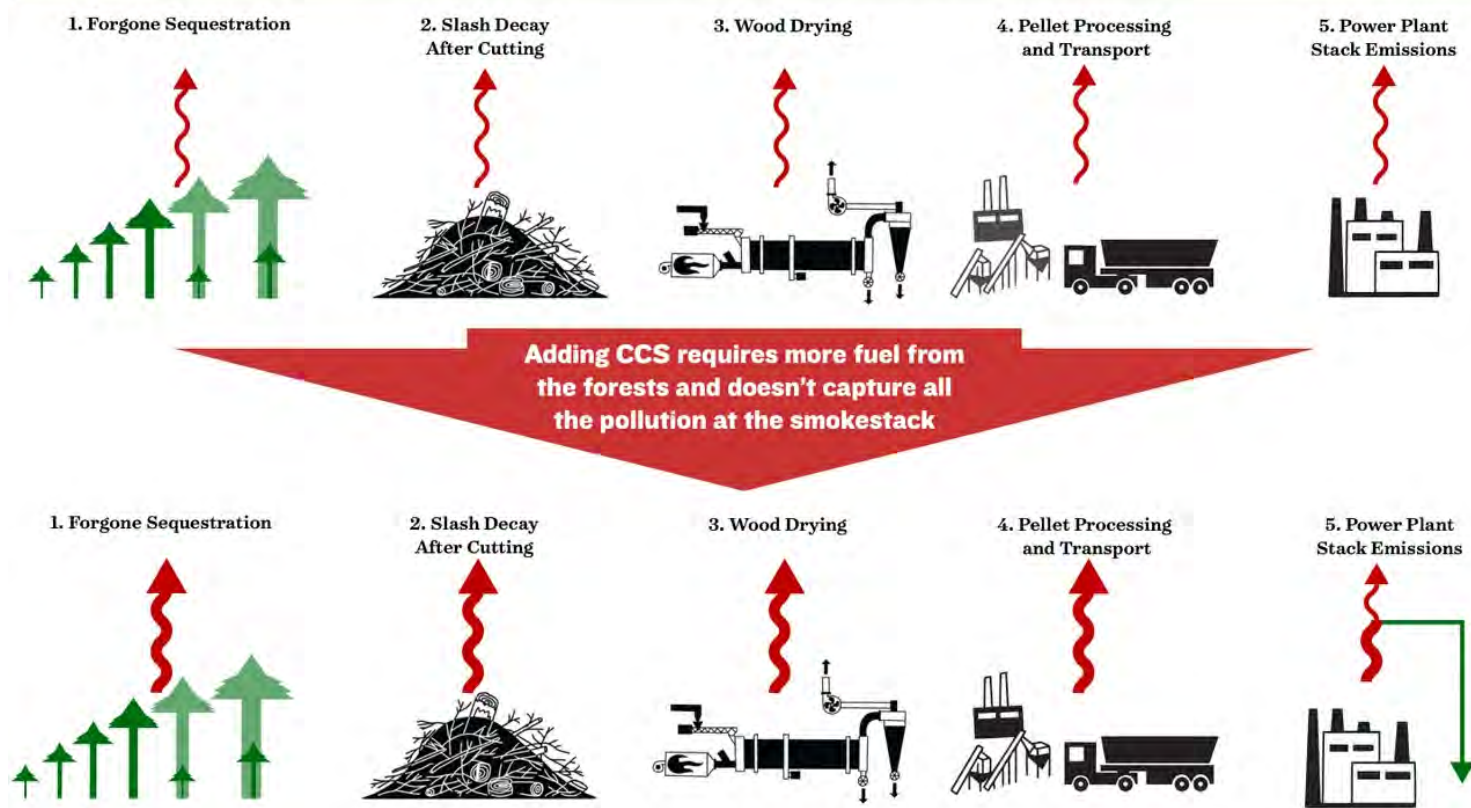
But the U.N.'s IPCC itself acknowledged in its [most recent report](#) that the concept of bioenergy with carbon capture “rests on the premise that bioenergy production is carbon neutral.”

That, Booth said, renders Drax's [claims](#) “bogus.”

“Burning trees and using CCS can no more deliver negative emissions than burning trees without CCS can deliver carbon-neutral emissions,” she said. “It's the same problem. Trees don't grow back that quickly.”

Drax's negative-emissions effort may instead be a play for more subsidies. In a recent [blog post](#), the Forest Defenders Alliance, a European environmental group, noted that Drax's existing subsidies — totaling nearly \$2.7 million per day — are set to phase out in five years. So the company, the post stated, is looking for a new “expensive scam” to get “more money out of the public.”

A [report](#) Drax commissioned and published in March proposes that the U.K. government continue providing subsidies both for power generation and carbon capture after 2027.

**FIGURE 1: SOURCES OF EMISSIONS FOR STANDALONE BIOPOWER AND BECCS**

A chart from a recent Natural Resources Defense Council report shows the various ways biomass power emits carbon, even with technology to catch pollution at generating stations

NRDC

There are other issues to relying on wood energy at scale. If the world were to supply just another 2% of its electricity demand with wood, it would require doubling the annual harvest of wood, according to Timothy Searchinger, a senior researcher at Princeton University. Providing 3.5% of America's energy demand would require doubling the number of trees cut down.

Other ways to provide negative emissions, such as [direct air capture technology](#) or [soil management techniques](#), wouldn't require felling forests that are actively sucking carbon as it is. Searchinger compared the proposition to exercise.

"If you eat lots of sugar but work out, you could be reasonably healthy," he said. "But if you don't eat lots of sugar and work out, you'll be healthier."

If the cost of capturing carbon with technology comes down, he said, you'd be better off burning coal or gas at a power plant than wood, since then you'd get a lot more energy per unit anyway.



Investors seem to be doubting Drax's claims, too. In October, the S&P dropped the company from its Global Clean Energy Index. This month, Citi downgraded its stock from "buy" to "hold."

There are some potential places where limited biomass energy could be useful, such as in California, where dead trees in drought-stricken forests need to be cleared anyway to reduce the harmful effects of wildfires, said Holly Jean Buck, a researcher at the University at Buffalo who studies negative emissions and decarbonization.

"The best case for biomass is waste biomass," Buck said. "We should think more about using waste biomass streams and less about for-purpose crops that could be used for other things, whether those be lumber to build houses or land that could be dedicated to other things."

(Drax, for its part, said about 40% of its wood does come from sawmill waste, citing data in its own annual [report](#), and insisted the rest of its wood comes from trees that are "not suitable for other uses.")

Searchinger said the biomass industry's tree plantations could only contribute to a negative emissions target if the world was actively reducing the amount of land used for agriculture. Instead, in most countries, old-growth woodlands such as the Amazon or Borneo's rainforests are being felled to make way for cattle ranches and palm oil plantations.

"The only way biomass becomes a potentially [carbon] negative contribution is in a world where we are actively reducing agricultural land and you have a choice as to whether you reforest that land or plant fast-growing woody plantations," he said. "It's entirely speculative, but depending on the assumptions you make, you could

arguably get more benefit from the fast-growing biomass plantations.”

He added: “There are these theoretical scenarios in which maybe this could be useful, but they’re sufficiently far in the future that they’re irrelevant right now.”



"You got people around here that stay sick. You got people around here that has to use asthma pumps that didn't have respiratory problems before," Carmella Wren-Causey told HuffPost.

TIMOTHY IVY FOR HUFFPOST

The biomass industry is set to experience its fastest growth in East Asia during the second half of this decade. A [report published](#) last year found South Korea was so heavily subsidizing biomass plants that the industry was crowding wind and solar out of the power market. Japan, meanwhile, is pushing ahead with plans to burn residues from palm oil for electricity, threatening even further deforestation.

In a February 2021 [letter](#) addressed to Biden, European, British, Japanese and Korean leaders, more than 500 scientists urged them “not to undermine both climate goals and the world’s biodiversity by shifting from burning fossil fuels to burning trees” and to “end

subsidies and other incentives that today exist for the burning of wood.”

“Trees are more valuable alive than dead both for climate and for biodiversity,” the letter read. “To meet future net zero emission goals, your governments should work to preserve and restore forests and not to burn them.”

Wren-Causey feels like she can relate.

“I want to live,” she said.

And she has much to live for. She has her husband and young nieces she adores. She cares for an abandoned pony. She’s hoping to start a charity to help local kids, and once a week, she takes elderly women who can’t drive to the post office and bank.

“But every night I’m in bed,” she said. “I’m praying and asking God to please let me wake up in the morning.”

### **Support HuffPost**

*At HuffPost, we believe that everyone needs high-quality journalism, but we understand that not everyone can afford to pay for expensive news subscriptions. That is why we are committed to providing deeply reported, carefully fact-checked news that is freely accessible to everyone.*

*Help keep news free for everyone by giving us as little as \$1. Your contribution will go a long way.*

SUPPORT HUFFPOST

## **RELATED**

CLIMATE CHANGE

POLLUTION

MISSISSIPPI

GREEN ENERGY



**Are We At The Dawn Of A Nuclear Energy**

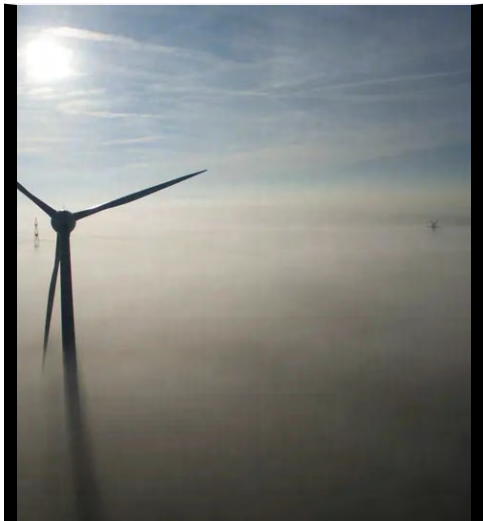


**Activists Call It A 'False Solution.' But**



**John Kerry's Climate Warning: 'Even If We**

BEFORE YOU GO



Drone Images Highlight Climate Change

See Gallery



VIEW 289 COMMENTS

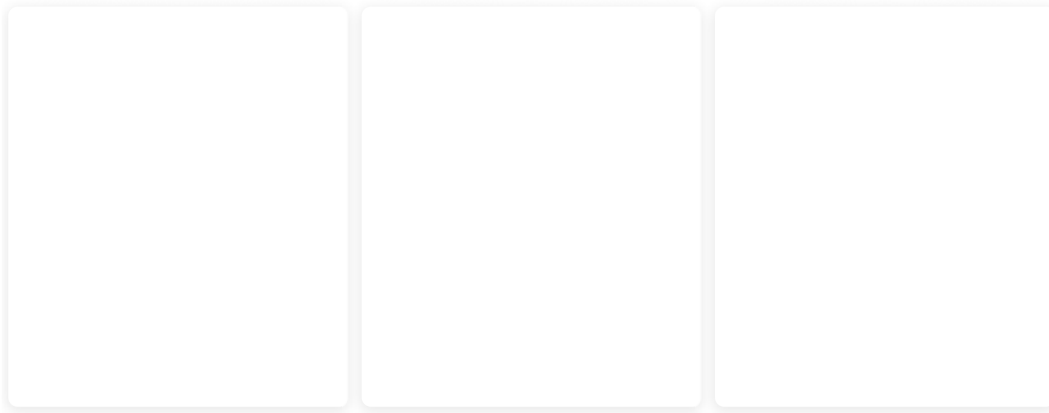


Alexander C. Kaufman  
Senior Reporter, HuffPost



[Suggest a correction](#)

POPULAR IN THE COMMUNITY



FROM OUR PARTNER



**1/2 Cup Of This (Before Bed) Eats Your Belly Fat Like Never Before!**  
getfittoday.online | Ad


**This Game is So Beautiful. If You Have a Computer it's a Must-Have.**  
Raid: Shadow Legends | Ad

**No More Free Returns? Amazon Releases New Fees**  
Online Shopping Tools | Ad




Unlock Your Creativity: Why 'Smart Drops' Are Going Viral







**Seniors in Colorado Are Eligible For Hearing Aids In 2024**  
Hear Clear | Sponsored




**Game shows what the world without US military...**  
History Strategy Game | Sponsored



**Diabetes Is Not From Sweets! Meet The Main Enemy Of...**  
Health Today News | Sponsored



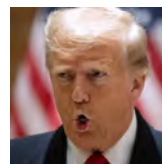
Recommended by  Outbrain

WHAT'S HOT

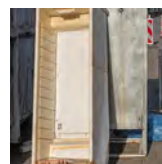
### Biden Apologizes To Asa Hutchinson Over DNC Statement On His Exit From The 2024 Race



### Trump's Latest Odd Brain Boast Has One Whale Of A Plot Twist



### New Homeowners Find Human Head In The Freezer



### The Average Age Of Grandparents Is Changing — And It Has Startling Implications



## MORE IN ENVIRONMENT

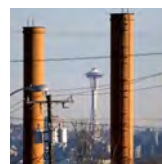
### Extremism Is Rampant In This Part Of The U.S. — And There's A Toxic Reason For It



### Donald Trump Talks Down To Protesters With 'Mommy' Send-Off At Iowa Rally



### Massive Gas Outage Threatens Millions Of Americans' Energy Supplies Amid Arctic Storm



### Bear Rescued From Bombed-Out Ukraine Zoo Finds New Home In Scotland





### **2023 Was One Of The Coldest Years Of The Rest Of Your Life**



### **Millions Of Plastic Pellets Wash Up On Spanish Beaches**



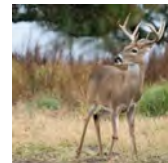
### **Biden Offers Companies Millions To Help U.S. Break Russia's Monopoly On A Vital Resource**



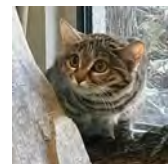
### **Scientists Find About A Quarter Million Nanoplastic Particles In Bottled Water**



### **A Deadly Deer Disease Is Spreading — And It's A Mystery**



### **'Looks Can Be Deceiving': Utah Zoo Welcomes Tiny Cat That's One Of The World's Deadliest**



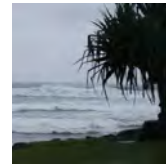
### **Mass Layoffs At Pioneering Nuclear Startup**



### **Beauty Company Denies Its Body Butter Sold At Sephora Attracts Spiders**



**Wild Weather Over Christmas Holiday  
Leaves At Least 10 Dead In Eastern  
Australia**



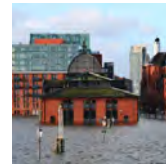
**Ice Storms And Blizzards Pummel The  
Central US A Day After Christmas**



**Facing Ruin At Home, These Nomads Saw  
No Choice But To Move. City Life Has Only  
Brought More Heartbreak.**



**At Least 2 People Killed As Storm Batters  
Northern Europe**



**Biden Finally Picks A Side In The Big Clean  
Energy Fight Dividing Democrats**



**This Country Is Responsible For Less Than  
1% Of Global Emissions. Climate Change Is  
Tearing It Apart Anyway.**



**Willow The Cat Hilariously Shows Off White  
House Decor**



**Drought-Stricken California To Let Sewage  
Waste Become Drinking Water**





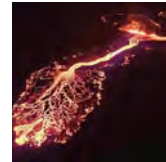
### **NASA Sends Video From Space By Laser And Orange Tabby Cat Acts Accordingly**



### **Biden Administration Finally Moves To Protect Remaining Old-Growth Forests From Logging**



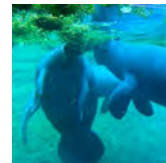
### **Volcano In Iceland Erupts After Triggering Thousands Of Earthquakes**



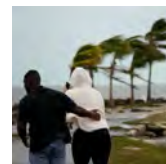
### **Democrats Are At War With One Another Over A Controversial New Plan**



### **Older Manatee Enjoys New Home With 'Lots Of Friends' After Months Alone In Pool**



### **Gusty Storms Batter Florida Before System Heads Up East Coast**



### **Kentucky Family Finds Baby Owl In Their Christmas Tree**



### **EPA Begins Formal Review Of Toxic Chemical That Burned In Ohio Train Derailment**



### Climate Summit Ends With An Agreement — But It Won't Be Enough



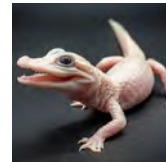
### Nations Agree To Transition Away From Fossil Fuels In 'Historic' Deal At UN Climate Summit



### GOP Senate Candidate Is 'Tough On China' — But His Investments Say Otherwise



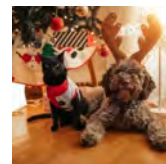
### Rare White Alligator Is Born At A Florida Reptile Park



### UN Climate Summit On 'Verge Of Complete Failure,' Al Gore Says



### 11 Holiday Items That Are Secretly Dangerous For Pets



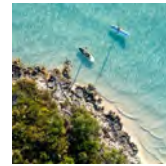
### Protests At UN Climate Talks See 'Shocking Level Of Censorship'



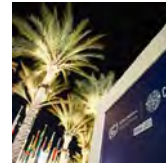
### Trump Slams John Kerry In Wild Town Hall, Insisting Climate Change Isn't A Problem



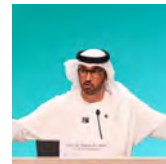
**Boston Tourist Killed By Shark While  
Paddleboarding In Bahamas**



**COP28 Climate Summit Awash In Record  
Number Of Fossil Fuel Lobbyists**



**Head Of Global Climate Summit Manages  
To Deny Science In Pro-Science Comment**



**Greasy Yet Adorable Mole Resurfaces After  
Hiding Out For 8 Decades**



**Scandal At Major Climate Summit Spurs A  
Resignation**



**Mali, 'One Of The World's Saddest  
Elephants,' Dies Alone In Captivity**



**Why Gas Prices Are Likely To Spike — Once  
Again**



**A Scandal Just Rocked A Major Climate  
Summit — And It Was Years In The Making**



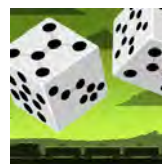
### President Of UN Climate Summit Planned For Oil And Gas Deals Behind The Scenes: Report



### Ohio Egg Farm Slaughters 1.35 Million Chickens Over Bird Flu



### This Type Of Disaster Could Be The Most Dangerous Of All — And It's A Mystery



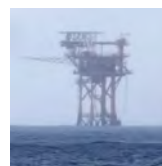
### Venice Rolls Out Day-Tripper Fee Amid Overtourism Fears



### Residents Of Kentucky Town Can Return Home After Crews Extinguish Derailment Fire



### Hunt For Pipeline Leak Continues As Oil Spill Tops 1 Million Gallons



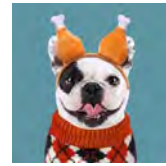
### This Country Is Gripped By Political Chaos — But Some See A Big Opportunity



### These Japanese Incarceration Camp Survivors Are Calling Out A Climate Change Measure That Feels Like Cultural Erasure



### The Thanksgiving Foods That Are Dangerous To Pets



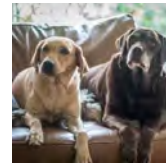
### Taylor Swift Postpones Rio Show Due To 'Extreme Temperatures' After Fan's Death



### Orcas Pummel Boat After Crew Tries To Deter Them With Heavy Metal Music



### Dogs Are Getting Sick And Dying From A Mystery Illness In Several States



### PepsiCo Sued By New York State Over Plastics Polluting Rivers, Drinking Water



### A Massive U.S.-Led Pledge Could Be A Global Gamechanger



### A Volcano In Iceland Could Erupt At Any Moment. What's Going On?



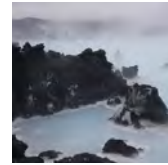
### Indians Celebrating Diwali Set World Record As Pollution Worries Rise



### Escaped Zoo Owl May Be On A Futile Search For Love, And People Can Relate



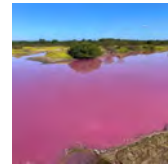
### Iceland Evacuates Town As Volcano Threatens To Erupt



### Bear-y Hungry: Video Shows Florida Mammal Swiping Food Delivery Order Off A Porch



### A Pond In Hawaii Turned Barbie Pink. Here's What Scientists Think That Means.



### U.S. Lawyer Accused Of Shooting 2 Environmental Protesters Dead In Panama



### The U.S. Project Meant To Debut Revolutionary Nuclear Reactors Just Fell Apart



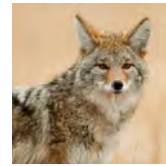
### Michigan Gov. Gretchen Whitmer's 100% Clean Energy Bills Pass



### Maine Voters Reject Public Takeover Of Power Companies After Multi-Year Battle



### **The Chillest, Most Handsome Coyote Lounges On Patio Couch In San Francisco**



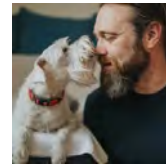
### **Surfboard-Stealing Otter Is Now Mom To A New Pup**



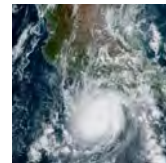
### **Video Shows Black Bear's Sneak Attack On A Security Guard**



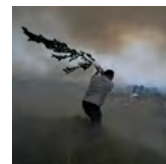
### **How Long Should You Wait After Losing A Pet To Get Another One?**



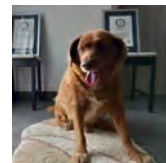
### **Hurricane Otis Makes Landfall As Category 5 Storm Off Mexico's Coast**



### **Scientists Warn Earth Has Entered 'Uncharted Climate Territory'**



### **Bobi, The World's Oldest Dog Ever, Dies In Portugal At The Age Of 31**



### **Biden's "Moonshot" To Fight Cancer Just Took A Big Step Forward By Moving To Ban This Chemical**



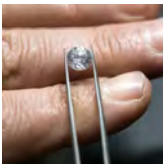
**Hurricane Norma Makes Landfall Near Mexico's Los Cabos, Tammy Hits Barbuda In The Caribbean**



**Democratic Governors Block Bills For New Nuclear Power Plants**



**Synthetic Diamonds Are Wildly Cheaper Than Natural Ones. So What's The Catch?**



**China Bans Exports Of A Key Material, Escalating Trade War With U.S.**



- NEWS
- ENTERTAINMENT
- VOICES
- SHOPPING
- ABOUT US
- CONTACT US
- FAQ
- USER AGREEMENT
- DMCA POLICY
- ACCESSIBILITY STATEMENT
- CONSENT PREFERENCES

- POLITICS
- LIFE
- HUFFPOST PERSONAL
- NEWSLETTERS
- ADVERTISE
- RSS
- CAREERS
- COMMENT POLICY
- HUFFPOST PRESS ROOM
- PRIVACY POLICY
- DO NOT SELL OR SHARE MY PERSONAL INFORMATION



January 8, 2024

*Via Electronic Mail:* [lauren.whybrew@orcca.org](mailto:lauren.whybrew@orcca.org)

Lauren Whybrew  
Olympic Region Clean Air Agency  
2940 Limited Lane NW  
Olympia, WA 98502

**RE: Hazardous Air Pollutant (HAP) Deficiencies in Preliminary Determination for Pacific Northwest Renewable Energy, LLC (PNWRE)**

Dear Ms. Whybrew:

In July 2023, Pacific Northwest Renewable Energy, LLC (PNWRE) submitted an air permit application for a 440,800 tpy wood pellet manufacturing facility to be located in Hoquiam, Washington. Although this industry has been operating in US South for more than a decade, this would be the first industrial-scale, export-based wood pellet plant in the US Pacific Northwest.

As attorneys with the Southern Environmental Law Center and Environmental Integrity Project, we have worked extensively on air quality issues at wood pellet plants since 2017, reviewing permits and applications for more than 35 pellet plants located in a dozen states. We have also compiled a database of more than 50 stack tests from these facilities and discovered thousands of tons of excess VOC and HAP emissions, resulting in more than \$6 million in environmental penalties and the installation of new pollution control technology at numerous plants.<sup>1</sup>

We write now because PNWRE has **vastly underestimated HAP emissions**. The company claims the facility will emit only 1.3 tons of HAPs per year; this estimate is deeply flawed and based on incorrect or inappropriate emission factors—mostly AP-42 emission factors that are not specific to wood pellet plants. Recent stack tests and air permit applications that are specific to this industry show that a facility this size and with the controls proposed by PNWRE will emit 40 tons or more of total HAPs per year, including more than 20 tons of methanol and a significant amount of the particularly toxic HAP acrolein.

As just one example, the pellet manufacturer Drax, which operates 18 industrial-scale pellet plants, recently applied for an air permit for a 496,000 tpy facility in Longview, Washington. Drax estimates that its facility—which is comparable in scale, control technology, and feedstock to PNWRE—will emit 49 tons of HAPs.<sup>2</sup> This is well in line with numerous other recent

---

<sup>1</sup> See, e.g., [https://www.nola.com/news/environment/british-company-agrees-to-pay-3-2-million-for-air-pollution-at-louisiana-wood-pellet/article\\_c451e610-4352-11ed-8a54-43df54e33cd5.html](https://www.nola.com/news/environment/british-company-agrees-to-pay-3-2-million-for-air-pollution-at-louisiana-wood-pellet/article_c451e610-4352-11ed-8a54-43df54e33cd5.html).

<sup>2</sup> Letter from Trinity Consultants, on behalf of Drax, to Danny Phipps, Air Quality Engineer, Southwest Clean Air Agency, at Attachment 2: Updated Potential Emission Calculations and Stack Test Data, Table C-2b (Mar. 29, 2023) (Attachment A). Available via Sharefile link at: <https://southernenvironment.sharefile.com/d-sa745e15d0ed64ba0bcb8a6fe2cc87102>.

applications and stack tests at wood pellet plants,<sup>3</sup> and suggests PNWRE will have the potential to emit about 43 tons of HAPs per year.

Additionally, PNWRE intends to operate wet (aka green) hammermills that will not be vented to any VOC controls and has improperly listed these units as not emitting any VOCs and HAPs. Most comparable mills vent these units to the furnace or dryer RTO for VOC and HAP control, and stack tests on uncontrolled wet hammermills<sup>4</sup> show PNWRE's wet hammermills will emit up to 60 tons of VOCs and six tons of HAPs (in addition to the emission rates calculated above).

Given the foregoing, PNWRE's application is deficient and incomplete. Specifically, as a major source of HAPs, the company must submit a case-by-case Maximum Achievable Control Technology analysis. Additionally, the company's air toxics Ambient Impact Review is wholly irrelevant as it is based on inaccurate HAP emission rates. Finally, the company's BACT analysis for the wet hammermills is incomplete for failing to assess VOC controls.

These are only the most significant issues identified in PNWRE's application. We believe, however, that at minimum ORCAA must withdraw PNWRE's application from notice and comment until the company revises its application to address these issues. Finally, we are happy to share any of the resources that we have gathered concerning this industry.

Respectfully,

/s/ Patrick Anderson

Patrick J. Anderson  
Southern Environmental Law Center  
Ten 10<sup>th</sup> Street, NW, Suite 1050  
Atlanta, Georgia 30309  
404-521-9900  
[panderson@selcga.org](mailto:panderson@selcga.org)

Heather Hillaker  
Southern Environmental Law Center  
601 West Rosemary Street, Suite 220  
Chapel Hill, NC 27516-2356  
919-967-1450  
[hhillaker@selcnc.org](mailto:hhillaker@selcnc.org)

---

<sup>3</sup> See, e.g. Enviva Pellets Waycross, Application for Title V Permit Significant Modification Without Construction, at Appendix C (Oct. 2021) (Attachment B) (Showing that at a production capacity of 920,000 tpy, the facility emits 79 tons of HAPs. This ratio equates to 38 tons of HAPs at PNWRE. Enviva, which operates 10 pellet plants, has used these same emission factors in recent applications in Alabama and Mississippi as well); see also Drax Amite BioEnergy, Title V Air Permit Application, at Appendix B (Feb. 2022) (Attachment C) (Showing 40 tons of HAPs emitted by the facility). These applications and related stack tests are available on Sharefile at: <https://southernenvironment.sharefile.com/d-sa745e15d0ed64ba0bcb8a6fe2cc87102>.

<sup>4</sup> Enviva Pellets Wiggins, LLC, Air Emission Test Report (Oct. 31, 2013) (Attachment D); Enviva Pellets Amory, LLC, Air Emission Test Report (Oct. 31, 2013) (Attachment E). Available on Sharefile at: <https://southernenvironment.sharefile.com/d-sa745e15d0ed64ba0bcb8a6fe2cc87102>.

# Forest Clearing Rates in the Sourcing Region for Enviva Pellet Mills in Virginia and North Carolina, U.S.A.

## Prepared by:

Dr. Christopher A. Williams, Ph.D.,  
with technical assistance from doctoral student Li Xi  
Graduate School of Geography  
Clark University  
950 Main Street  
Worcester, MA 01610 USA

## Prepared for:

Southern Environmental Law Center  
Attn: David W. Carr, Jr., General Counsel  
201 W. Main Street, Suite 14  
Charlottesville, VA 22902-5065 USA  
Phone: 434-977-4090  
Fax: 434-977-1483  
[www.SouthernEnvironment.org](http://www.SouthernEnvironment.org)

## Contact Information for Report:

Christopher A. Williams, Ph.D.  
Email: [cwilliams@clarku.edu](mailto:cwilliams@clarku.edu)  
Phone: 508-793-7323

Date Submitted: December 7, 2021

## Table of Contents

|                                                          |    |
|----------------------------------------------------------|----|
| 1. Introduction.....                                     | 1  |
| 2. Study Region.....                                     | 2  |
| 3. Methods.....                                          | 7  |
| 4. Results.....                                          | 9  |
| 4.1 Trends in Forest Clearing Rates.....                 | 9  |
| 4.2 Forest Area Changes, 2001 to 2016.....               | 21 |
| 4.3 Feedstock Supplied by the Harvested Area .....       | 23 |
| 5. Conclusions.....                                      | 25 |
| 6. Citations .....                                       | 26 |
| Appendix 1 Figures of Areas Excluded from Analysis ..... | 29 |
| Appendix 2 Datasets Provided with Report.....            | 32 |
| Appendix 3 Area of Gross Forest Clearings .....          | 33 |

## 1. Introduction

Since the early 2010s the southeastern U.S. has become a central hub for the sourcing and manufacturing of wood pellets exported to Europe and the U.K. for heating and power generation (1, 2). Production continues to rise, with the U.S. exporting approximately 7.26 million metric tons (“tonnes”) of wood pellets in 2020, mostly produced in the southeastern U.S., and with the U.K. utility company Drax Power burning more than 4.6 million tonnes of those wood pellets in 2020 (3, 4). The Danish energy company Ørsted is another large consumer of wood pellets from the southeastern U.S., providing about one-third of Denmark’s district heating and one-fourth of the country’s total power generation with wood pellets and chips (see [reporting and briefs](#)).

Some of the earliest large-scale pellet manufacturing plants were established in northeastern North Carolina and southeastern Virginia. Enviva owns and operates three plants in that area, including one in Ahoskie, North Carolina, another in Northampton, North Carolina, and a third in Southampton, Virginia (Figure 1). These mills came online in 2011, early 2013, and late 2013, and had a production capacity of approximately 1.4 million tonnes of pellets per year until 2019 when the maximum capacity of the three mills increased to over 1.9 million tonnes per year (5-8). Enviva added a fourth mill in Sampson County, North Carolina becoming operational in 2016.

The wood used to produce these pellets is sourced from forests in the vicinity of pellet mills. This demand increases harvest extraction and may be expanding the area of forest that is harvested each year. The industry claims that their material is sourced only from the wood waste or wood ‘residue’ generated by clearcut harvesting, including tree tops, branches, and discarded trunks that are not of commercial value for sawtimber or other wood products, along with secondary feedstocks from sawmill and wood industry residues. However investigative reporting by watchdog journalists and environmental groups has documented whole trees of large diameter being extracted from mature hardwood forest, including swamplands, and trucked for direct delivery to wood pellet mill sites such as Enviva’s Northampton, Southampton, and Ahoskie mills from 2013 through to 2019 (9, 10). This has raised an alarm about unsustainable and damaging logging practices used to source this industry, as well as the clearcutting of iconic, hardwood forests within the region. Also of concern is the climate warming impact of the bioenergy sector, which contributes to the clearing of growing forests that were sequestering atmospheric carbon, redirects harvested wood from storage within wood products toward the faster-release carbon emissions pathway associated with prompt combustion to produce energy, and does so with a fuel that is of low energy density and has high greenhouse gas emission per unit of energy produced (11, 12).

Pellet mill and biomass energy companies alike have come under pressure to source their material sustainably, leading to the establishment of institutions such as the Sustainable Biomass Program (see <https://sbp-cert.org/>) which seeks to evaluate the sustainability of biomass extraction operations and to certify them as sustainable where appropriate. The SBP reports for Enviva’s mills approach sustainability with an emphasis on (a) biomass growth exceeding harvesting removals, (b) avoiding the use of threatened or endangered species for wood pellet

production, (c) avoiding high conservation value areas, (d) use of best practices for forest management and regrowth, and (e) sourcing of pellet feedstocks principally from so-called residues and low value roundwood as described above (5-7). However, the large volume of material consumed by Enviva's mills within the region calls into question whether these constraints are truly being met. Moreover, meeting forest harvesting sustainability criteria, as outlined in the SBP program, provides no assurance that atmospheric carbon is not increased by forest bioenergy use (including its harvesting, processing, transport and combustion). Furthermore, the SBP program has been criticized for a lack of independence and other deficiencies in the program's ability to provide credible assurances that its sustainability standards are being met (13). Furthermore, Enviva argues that their practices are maintaining a sustainable extent and biomass stock of forestland within the region given the market pull of a new demand for biomass. However, this claim has not been demonstrated with large-scale quantitative measurement, nor has it been analyzed with respect to forest types. It remains unclear how the pattern and rate of forest clearings have responded to pellet mill operations – something that can be reliably quantified with satellite remote sensing of forest extent and annual forest loss conducted at a medium resolution (30 m x 30 m).

This study utilizes the best-available satellite data records to map the harvesting of forests in the source regions of mills over time, and to analyze time series to detect whether harvesting has increased as a result of mill operations. We examine the rates of clearing by forest type. Also, we diagnose whether there has been a conversion of forestlands from hardwoods to softwoods, and if there has been an expansion (or decline) of forest cover in the area surrounding mills.

## 2. Study Region

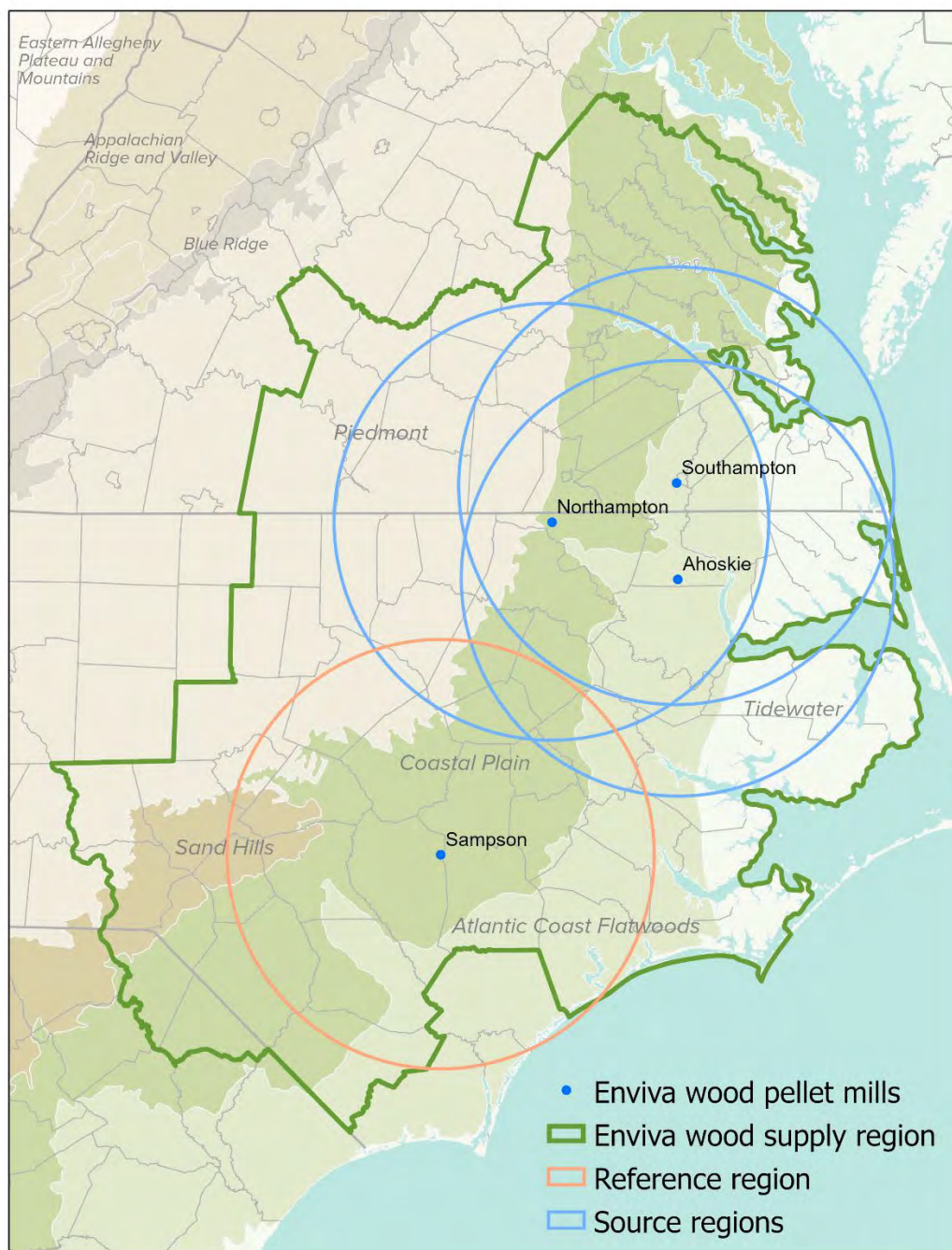
The study area encompasses areas within 100 km radii of the Enviva pellet mills at Northampton, Southampton, and Ahoskie (Figure 1) (the “3-mill area”). We define these areas as approximate “source regions” for each of the mills, and confirmed that this extent is consistent with Enviva's Track and Trace tool (<https://www.envivabiomass.com/sustainability/responsible-sourcing/track-trace/>). The latitude, longitude coordinates for each pellet mill are: Enviva Northampton: 36.504969, -77.611456; Enviva Southampton: 36.666902, -76.971844; Enviva Ahoskie: 36.269097, -76.965500. Also, we defined a reference region, or control, outside of the influence of the three mills to serve as a baseline against which we can measure the influence of pellet mill operations. Use of a control group or reference region is a common approach for measuring the effect of a factor such as a change in land ownership or land conservation status on forest clearing when in the presence of a potentially time-varying baseline state (14, 15). We use Enviva's Sampson pellet mill (35.120949 latitude, -78.183700 longitude) as the reference region in this study because it is located within the same general physiographic region as the other three mills, and has a similar forest type composition (Table 1) but experienced pellet mill operations only from 2016. This reference area is representative of the forest clearing trends in a region free of pellet mill activity prior to 2016 when the pellet mill operations began in Sampson.

The source region for these mills rests predominantly within the Atlantic coastal plain (Figure 1). Forest types are dominated by Loblolly/Shortleaf Pine softwood, Oak/Hickory

hardwood, and Oak/Gum/Cypress hardwood forest types, with some mixed Oak/Pine stands (Tables 1, 2, Figure 2).

The region's forests are intensively harvested for a range of wood products manufactured at pulp mills and saw timber mills, but this utilization and extraction has been shifting over time. For example, a hardwood paper pulp mill in Franklin, Virginia was closed in 2010, coincident with the economic downturn. This closure reduced the demand for hardwood harvesting in the 3-mill area just before the pellet mill operations came online. Though International Paper Company re-purposed the mill as a fluff pulp mill opening in 2012, the fluff pulp supply relies on softwoods. Thus, a return of forest clearing at the rate prior to pellet mill operations would indicate the effect of pellet mills, particularly for deciduous hardwoods.





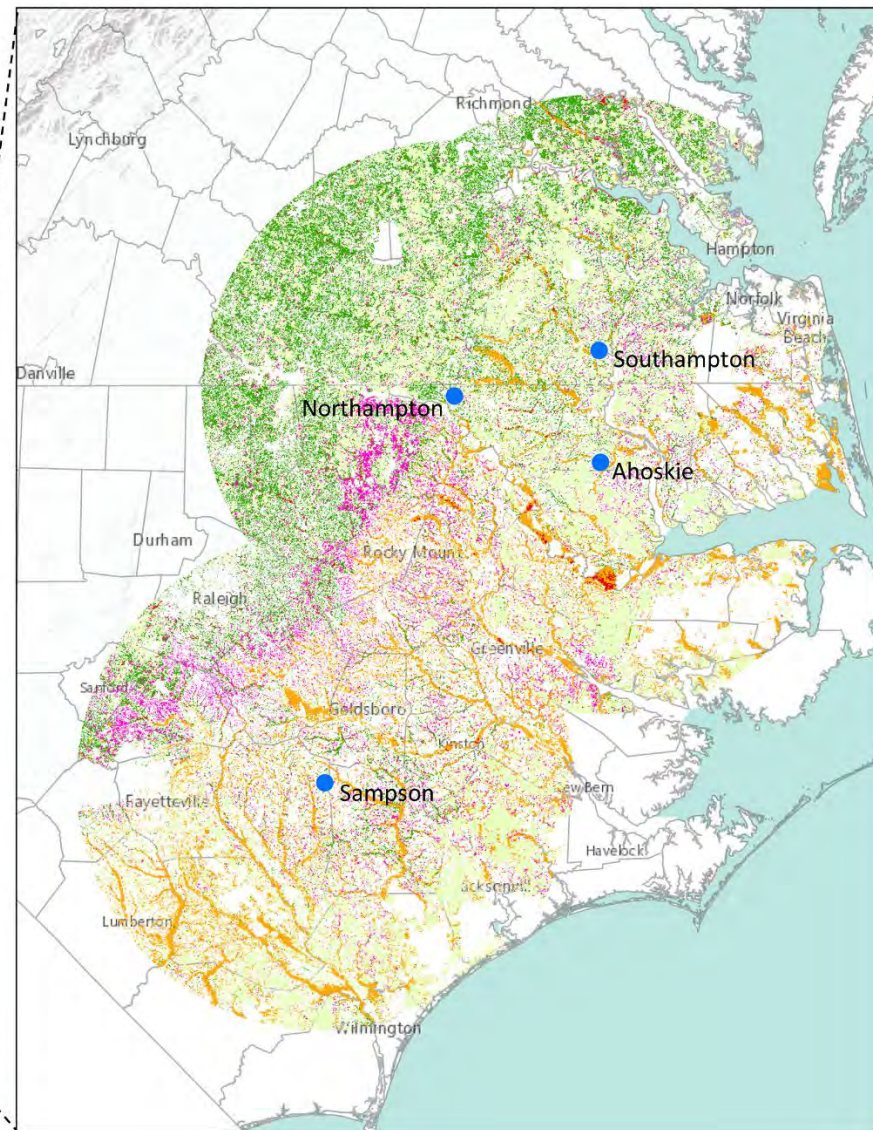
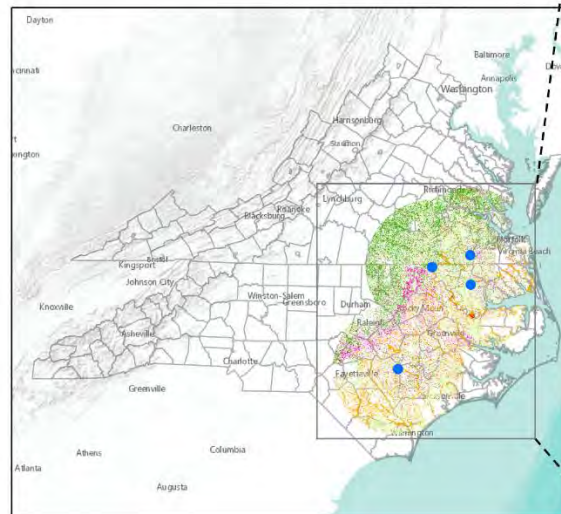
**Figure 1.** Map of the study region displaying the location of the Enviva wood pellet mills used in this study, the perimeter of Enviva’s current map outlining its primary wood supply for these mills, and including this study’s 3-mill source regions (blue circles) and its reference region (orange circle minus overlap with the blue circles). The base map displays the UDSA-NRCS Major Land Resource Areas our study region is located at, including Atlantic Coast Flatwoods, Tidewater, Coastal Plain, Sand Hills, and Piedmont.



## Distribution of Forest by Forest Type Groups

### Forest Types

- Loblolly/Shortleaf Pine
- Oak/Pine
- Oak/Hickory
- Oak/Gum/Cypress
- Elm/Ash/Cottonwood



**Figure 2.** Distribution of forest within the study region according to forest type groups of the U.S. Forest Service.

**Table 1.** Forest Area in 2000 by Forest Type Group in the 3-Mill and Reference Areas.

| Forest Area in 2000     | 3-Mill    |              | Reference |              |
|-------------------------|-----------|--------------|-----------|--------------|
|                         | [ha]      | [% of total] | [ha]      | [% of total] |
| Loblolly/Shortleaf Pine | 1,106,527 | 51%          | 604,379   | 53%          |
| Oak/Pine                | 187,947   | 9%           | 118,990   | 10%          |
| Oak/Hickory             | 594,475   | 27%          | 118,297   | 10%          |
| Oak/Gum/Cypress         | 261,445   | 12%          | 295,933   | 26%          |
| Elm/Ash/Cottonwood      | 18,427    | 1%           | 2,946     | 0%           |
| Deciduous               | 1,062,294 | 49%          | 536,166   | 47%          |
| Coniferous              | 1,106,527 | 51%          | 604,379   | 53%          |
| Total                   | 2,168,822 | 100%         | 1,140,545 | 100%         |

**Table 2.** Area of forestland by forest type in each 100 km radius surrounding the pellet mill and the reference region, as well as for the 3-mill areas combined.

| Forest Area in 2000 [ha] | Northampton | Southampton | Ahoskie   | 3-Mill    | Reference |
|--------------------------|-------------|-------------|-----------|-----------|-----------|
| Loblolly/Shortleaf Pine  | 844,455     | 738,936     | 736,137   | 1,106,527 | 604,379   |
| Oak/Pine                 | 152,495     | 107,925     | 130,672   | 187,947   | 118,990   |
| Oak/Hickory              | 497,240     | 327,793     | 188,556   | 594,475   | 118,297   |
| Oak/Gum/Cypress          | 159,111     | 173,161     | 246,187   | 261,445   | 295,933   |
| Elm/Ash/Cottonwood       | 14,960      | 13,138      | 9,765     | 18,427    | 2,946     |
| Deciduous*               | 823,805     | 622,018     | 575,180   | 1,062,294 | 536,166   |
| Coniferous*              | 844,455     | 738,936     | 736,137   | 1,106,527 | 604,379   |
| Total                    | 1,668,261   | 1,360,954   | 1,311,317 | 2,168,822 | 1,140,545 |

\*For the purposes of this study we assign forest type groups as follows: Coniferous includes White/Red/Jack Pine, Longleaf/Slash Pine, and Loblolly/Shortleaf Pine, and Deciduous includes Oak/Pine, Oak/Hickory, Oak/Gum/Cypress, and Elm/Ash/Cottonwood.

### 3. Methods

We mapped locations of annual forest clearing from 2001 to 2019 with the ~30 meter Global Forest Watch (GFW) year 2000 tree cover and 2001 to 2019 tree cover loss datasets (16). To compute areas of forest and of forest loss, we transformed the GFW dataset from its original 0.00025 degree resolution, World Geodetic System 1984 (WGS84) geographical coordinate system to the North American Datum of 1983 (NAD83) coordinate system, and then projected the data to the Albers Conical Equal Area projection with a 30 m resolution. We identified the forest type of cleared areas by clipping the GFW tree cover map to the U.S. Forest Service forest type group map representative of 2000 (17) and defined at the 30 m resolution according to the National Forest Carbon Monitoring System (18). Forest type groups were also aggregated into softwood coniferous and hardwood deciduous groups to allow us to detect whether forest clearings of hardwood stands increased after the initiation of pellet mill activity. We sampled the maps of forested area and forest clearings for four different pellet mill regions, and for the 3-mill area combined. We then mapped the distribution of forest area, and forest clearings from 2001 to 2019, by forest type on the 30 m x 30 m grid. We confirmed that the tree cover percent of the pixels included as forest in our analysis contains a tree cover percentage representative of true forestland by analysing the GFW tree cover percent. Forest areas included in our study had a median tree cover percentage of 97%, a 20<sup>th</sup> percentile tree cover percentage of 85%, and a tree cover of less than 40% for fewer than 5% of the pixels classed as forest.

We excluded forest disturbance and forest clearing events that are not likely to be related to market-driven biomass supply for wood products (see [Appendix 1](#) for figures displaying areas filtered out of the analysis). We excluded areas marked as developed in 2016, areas that experienced wildfires, and areas that have a protected or public game land or non-harvestable status. Developed areas were identified with the 2016 National Land Cover Dataset (NLCD, 2016) (19-22), including those 30 m pixels classified as developed open space or low, medium, or high intensity developed land. Protected lands were identified with the USGS, Gap Analysis Program (GAP), Protected Areas Database of the United States (PAD-US 2.0) (23), with GAP classes 1, 2, or 3, and public, non-harvestable lands such as those owned and managed by the U.S. Fish and Wildlife Service or the U.S. Department of Defense. Wildfires were identified as those areas of moderate to high burn severity from 1999 to 2017 according to the 30 m Monitoring Trends in Burn Severity (MTBS) (24) with its data release of August 29, 2018.

We measured the area of forest cleared each year by forest type and by deciduous or coniferous groupings by counting the number of pixels within a region that had loss and multiplying by pixel area (900 m<sup>2</sup> or 0.09 ha). We computed the percentage of forested pixels that were cleared each year by dividing the area cleared in a given year by the area of forest in 2000. We analyzed annual time series of the area of forest loss and the percentage of forest loss relative to forest cover in 2000 for individual forest types and for all forest types combined. We compared pre-mill forest clearing rates to those after the initiation of mill activity (referred to as “post-mill”). We expressed average annual forest clearing for three time periods: 2004-2008, 2013-2015, and 2016-2018, and quantified their ratios to assess the change in clearing after the initiation of mill operations. These time periods were selected to represent pre- and post-mill clearing rates during years of relatively favourable economic conditions as defined by Gross

Domestic Product. This removes variability associated with economic downturns, such as the recent recession in the late 2000s that is well-known to have significantly diminished the forest products industries of the southern U.S. (25-27). The years 2001 to 2003 and 2008 to 2010 were excluded because of anomalously low Gross Domestic Product in 2001, 2002, 2008, and 2009 (The World Bank, 2021) (28), along with 2003 and 2010 to account for the lag in the return of markets that influence harvesting practices. We identified pre-mill forest clearings as those during 2004 to 2007. With the three mills coming online from 2011 to 2013, we defined post-mill forest clearings in two time periods, 2013 to 2015, and 2016 to 2018.

The forest clearing time series mapped by GFW in its version 1.7 involves two distinct data processing and analysis periods, one for 2000 to 2010 and a second from 2011 to 2019, with the latter involving a more sensitive sensor from Landsat 8 OLI as well as improved validation data and an improved forest loss model ([http://earthenginepartners.appspot.com/science-2013-global-forest/download\\_v1.7.html](http://earthenginepartners.appspot.com/science-2013-global-forest/download_v1.7.html)). To guard against the potential non-stationarity that may result from these methodological changes over time, we compared forest clearing rates within the 3-mill source region to the time series of forest clearings seen within the Sampson pellet mill reference region prior to 2016 when mill operations were initiated there as well. Trends in the GFW dataset from 2011 to 2019 are not subject to this risk of non-stationarity, given temporal consistency in the satellite data and algorithm used to identify forest clearings.

To assess whether mill operations have led to a general increase in forest cover in the 3-mill source region, we measured changes in forest cover over time with the 30 m NLCD land cover datasets for 2001, 2011, and 2016. We did not rely on the GFW forest gain data for this purpose for several reasons. Firstly, at present the GFW forest gain estimates are only available for the period of 2001 to 2012 and thus are only representative of the time period prior to the initiation of pellet mill operations. Secondly, studies evaluating the GFW and similar datasets indicate that estimates of forest gains have lower accuracy than estimates of forest losses (16, 29-31), partly because forest growth is a more gradual and complex ecological process (32) that is more difficult to detect (30, 33). We note the following general correspondences between the NLCD classes and those derived from the U.S. Forest Service forest type group map within this study's regions of interest: NLCD Coniferous corresponds to the Longleaf/Slash Pine and Loblolly/Shortleaf Pine forest type groups; NLCD Mixed corresponds to the Oak/Pine forest type group; NLCD Woody Wetlands corresponds partly to the Oak/Gum/Cypress forest type group but may also overlap with Elm/Ash Cottonwood and other forest types including the pine groups; NLCD Deciduous corresponds to a restricted subset of the Oak/Hickory forest type group. We computed changes in the area forested from the 2001 to 2011 and from 2011 to 2016 NLCD datasets, and quantified the annual average rate of change in forested area for all NLCD forest classes, with emphasis on the Deciduous, Mixed, and Woody Wetlands classes.

Finally, we estimate the total biomass yield associated with clearings in the combined 3-mill source region area, and compare it to the feedstock supply that is consumed by the three mills in recent years. We adopt a typical harvest yield of 93 green tons of biomass per acre (equal to 84 green tonnes of biomass per acre, or 208 green tonnes of biomass per hectare), and a pellet yield of 0.4464 dry tonnes of pellets per green tons of biomass furnished (equal to 0.4921 dry tonnes of pellets per green tonnes of biomass furnished) as reported by Spencer Phillips of Key-Log Economics (34). This harvest yield is consistent with the biomass density reported in



our own work on southeastern U.S. forests, reporting an average biomass density of about 120 metric tonnes of dry biomass per hectare for harvestable forests (35), which equates to approximately 97 green tonnes of biomass per acre assuming a water content of 50%. We compute the potential pellet supply from:

$$\text{Potential pellet supply [dry tonnes per year]} = A \times B \times P$$

where A is the area cleared [hectares per year], B is green biomass yield per area cleared [green tonnes biomass furnished per hectare harvested], and P is dry pellet mass produced per unit green biomass furnished [dry tonnes pellets per green tonnes biomass]. Additionally, we compute the true total Enviva pellet supply estimated to be derived from deciduous harvesting from:

$$\text{Enviva pellet supply from deciduous harvesting [dry tonnes pellets per year]} = F \times H \times PS \times P$$

where F is the pellet feedstock reported by Enviva [green tonnes of biomass feedstock per year], H is the percentage (=78%) from hardwoods as reported in Enviva's supply base reports (5-7), PS is the percentage (=87%) of pellets arriving from primary supply via direct harvesting in forests, and P is dry pellet mass produced per unit green biomass furnished [dry tonnes pellets per green tonnes biomass].

## 4. Results

### 4.1 Trends in Forest Clearing Rates

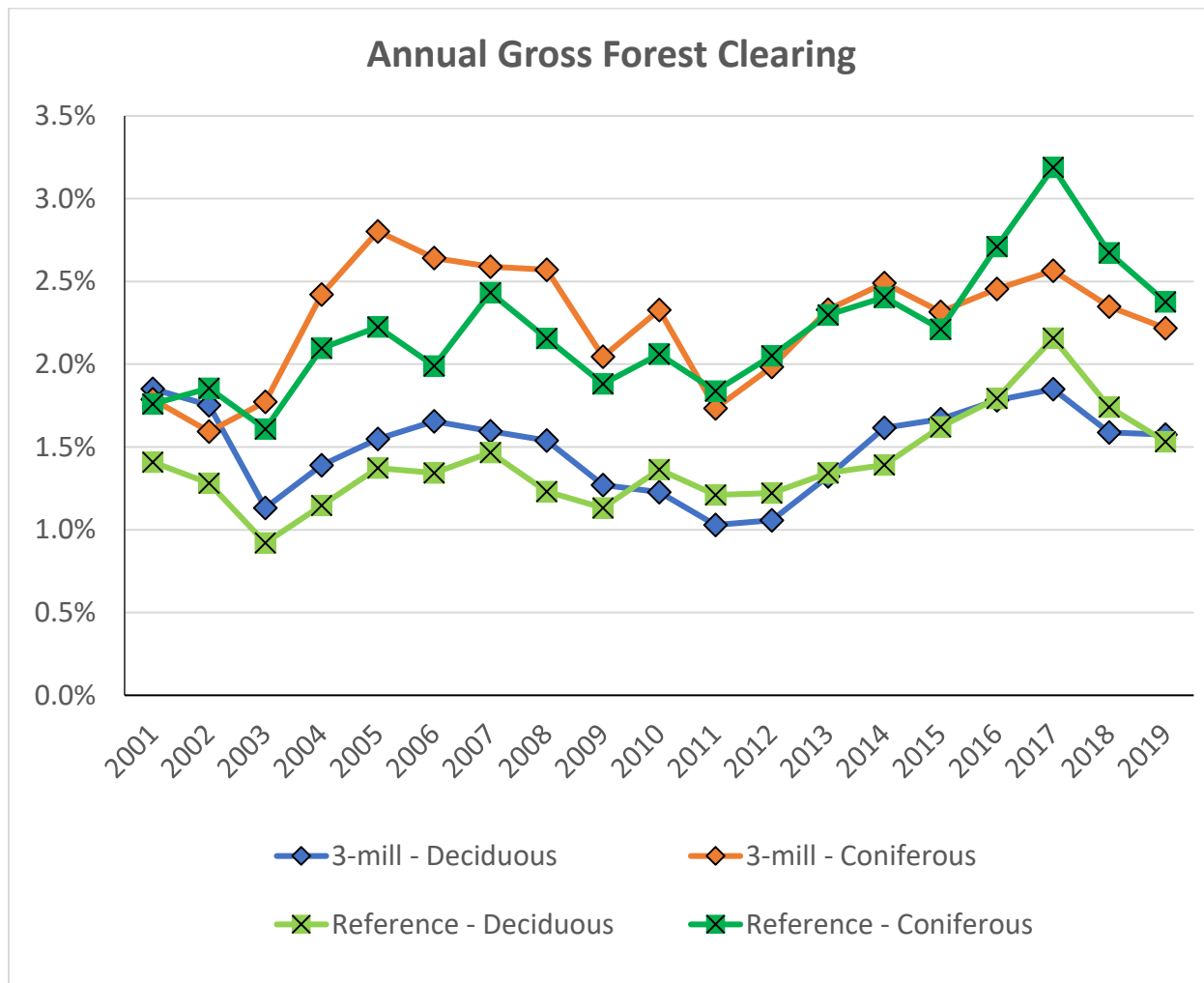
Deciduous forest clearing in the 3-mill region rose sharply after 2012 to a peak in 2017 ([Figure 3](#)). During the recession-free, pre-pellet-mill period of 2004 to 2008, the 3-mill area saw a gross forest clearing rate of 1.5% per year (16,425 hectares per year) ([Table 3](#)). Deciduous forest clearing dropped to 1.1% per year for 2009 to 2012 with the recession and coincident closure of the Franklin, VA hardwood paper and pulp mill. With the initiation of pellet mill operations in the region, deciduous forest clearing returned to the pre-recession level (1.5% per year) by 2013 to 2015, and then rose to 1.7% per year (18,480 ha per year) from 2016 to 2018. Oak/Hickory and Oak/Pine forests saw the largest increase in forest clearing from the mid-2000s to the mid- and late 2010s ([Table 4](#)).

Coniferous forest clearing had a similar pattern in the 3-mill region ([Table 3](#), [Figure 3](#)). Gross coniferous forest clearing in this area was 2.6% per year from 2004 to 2008, decreased to 2.0% per year from 2009 to 2012, rose to 2.4% per year for 2013 to 2015 and 2.5% per year from 2016 to 2018. Time series of annual clearing rates for the dominant forest types are shown in [Figures 4, 5, 6, and 7](#). A map of forest losses is displayed in [Figure 8](#) for the entire region, and with a focus on specific cutout regions within the vicinity of the 3-mill cluster ([Figures 9, 10](#)).

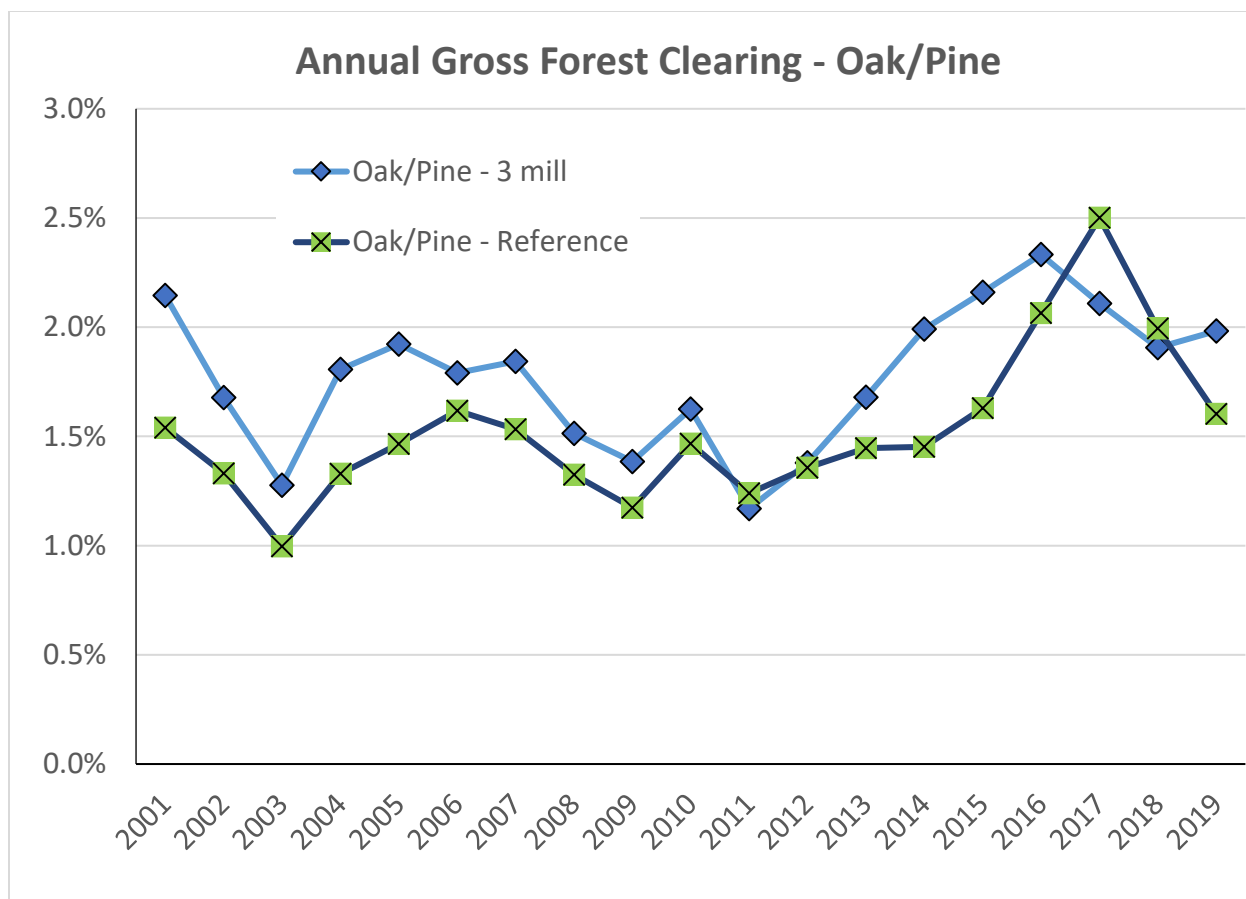
Forests of the reference region experienced similar trends in clearing rates over time but with a smaller decline during the 2009 to 2012 period. Gross deciduous forest clearing in the reference

region was fairly steady from 2004 to 2015, at around 1.3% per year. Thereafter, when the Sampson pellet mill began its operations in 2016, deciduous forest clearing rose to 1.9% per year from 2016 to 2018. Similarly, gross forest clearing of coniferous forests in the reference region was about 2.2% per year from 2004 to 2015 and rose to 2.9% per year by 2016 to 2018.

To summarize, we find that the rate of forest clearing increased markedly after the initiation of pellet mill operations at Northampton, Southampton, and Ahoskie. By 2013 to 2015, the 3-mill region saw deciduous forest clearing increase by 1.34 times that of 2009 to 2012, and by 2016 to 2018 it increased by 1.51 times, based on the rates reported in Table 4. By comparison, the reference region saw an increase of only 1.18 times for 2013 to 2015 relative 2009 to 2012. However, once pellet mill operations began at the Sampson mill, deciduous forest clearing rose to 1.54 times the rate during the recession period. Thus, it is very likely that the initiation of pellet mill operations contributed to elevated rates of deciduous forest clearing in the 3-mill region beginning in the early 2010s, and in the reference region beginning in 2016.

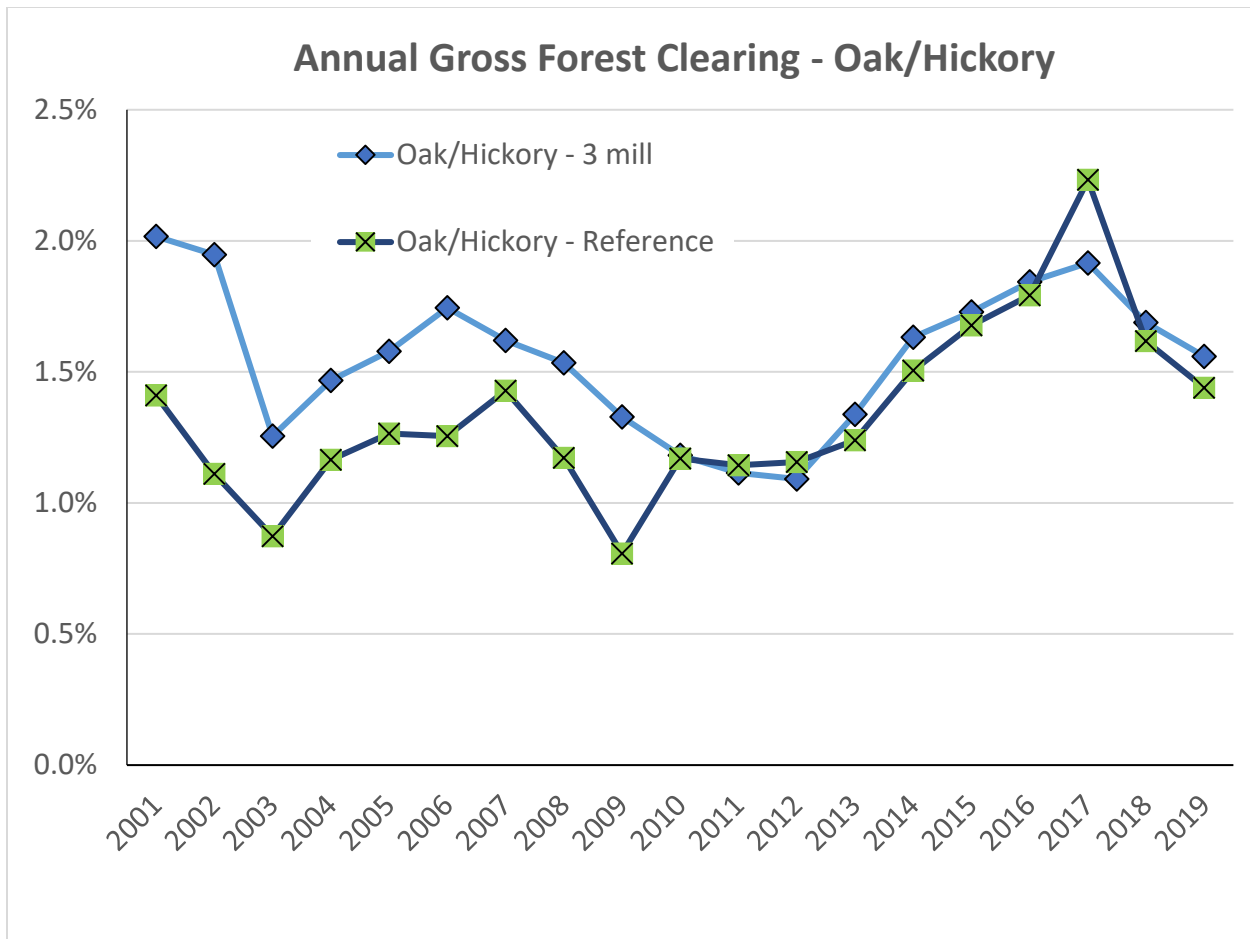


**Figure 3.** Time series of annual gross forest clearings as percent of year-2000 forestland for the 3-mill and reference regions and for both deciduous-dominated and coniferous-dominated forest types from 2001 to 2019.

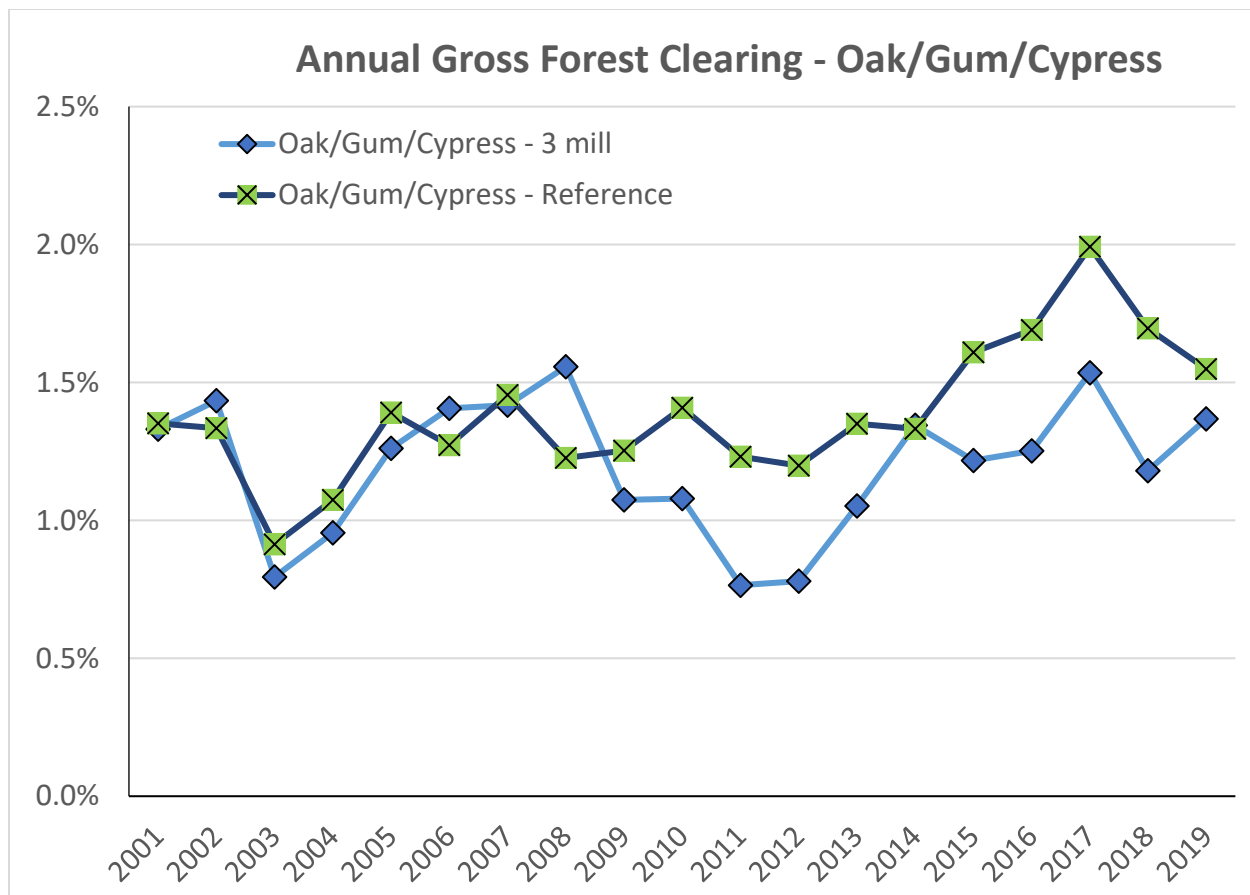


**Figure 4.** Time series of annual gross forest clearings for Oak/Pine forests within the 3-mill region and reference regions.

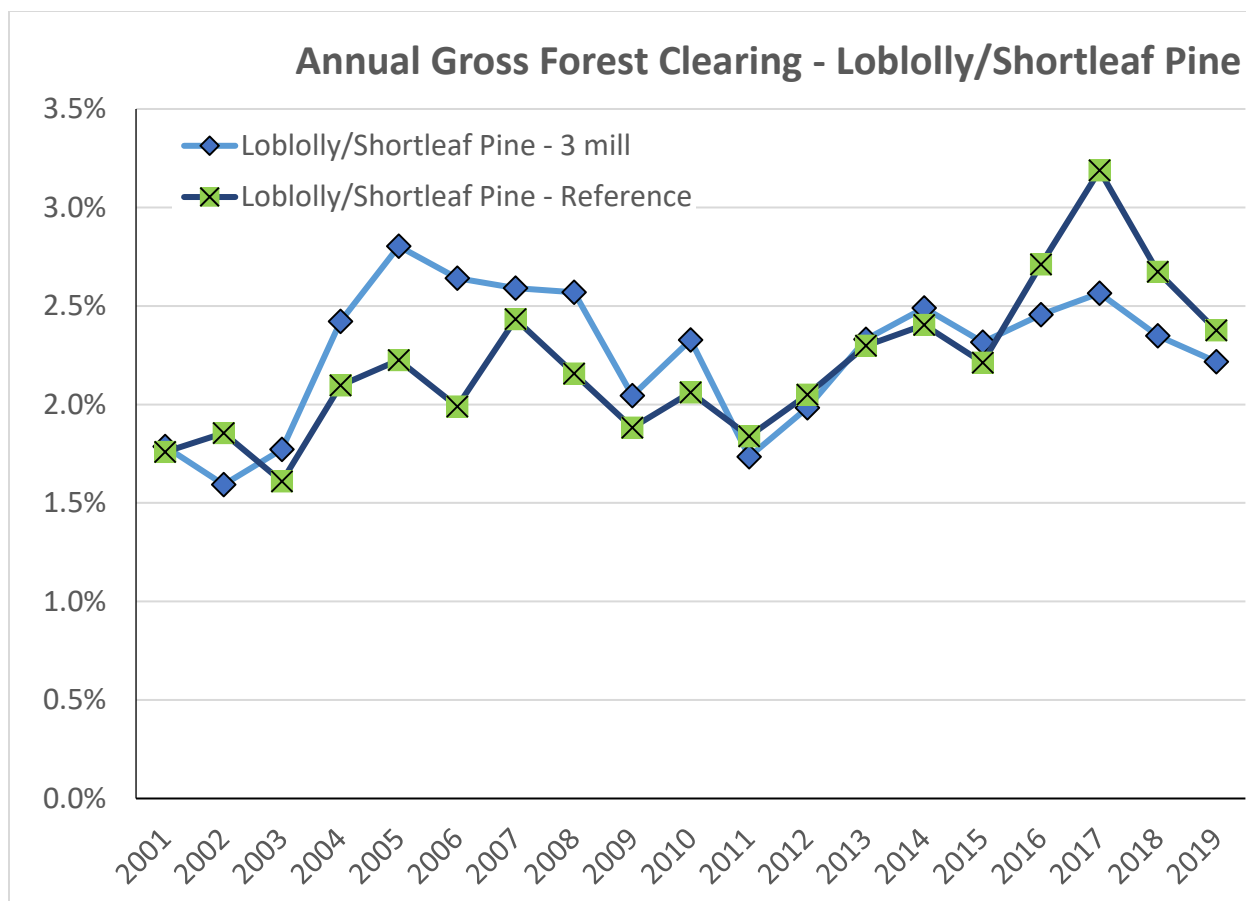




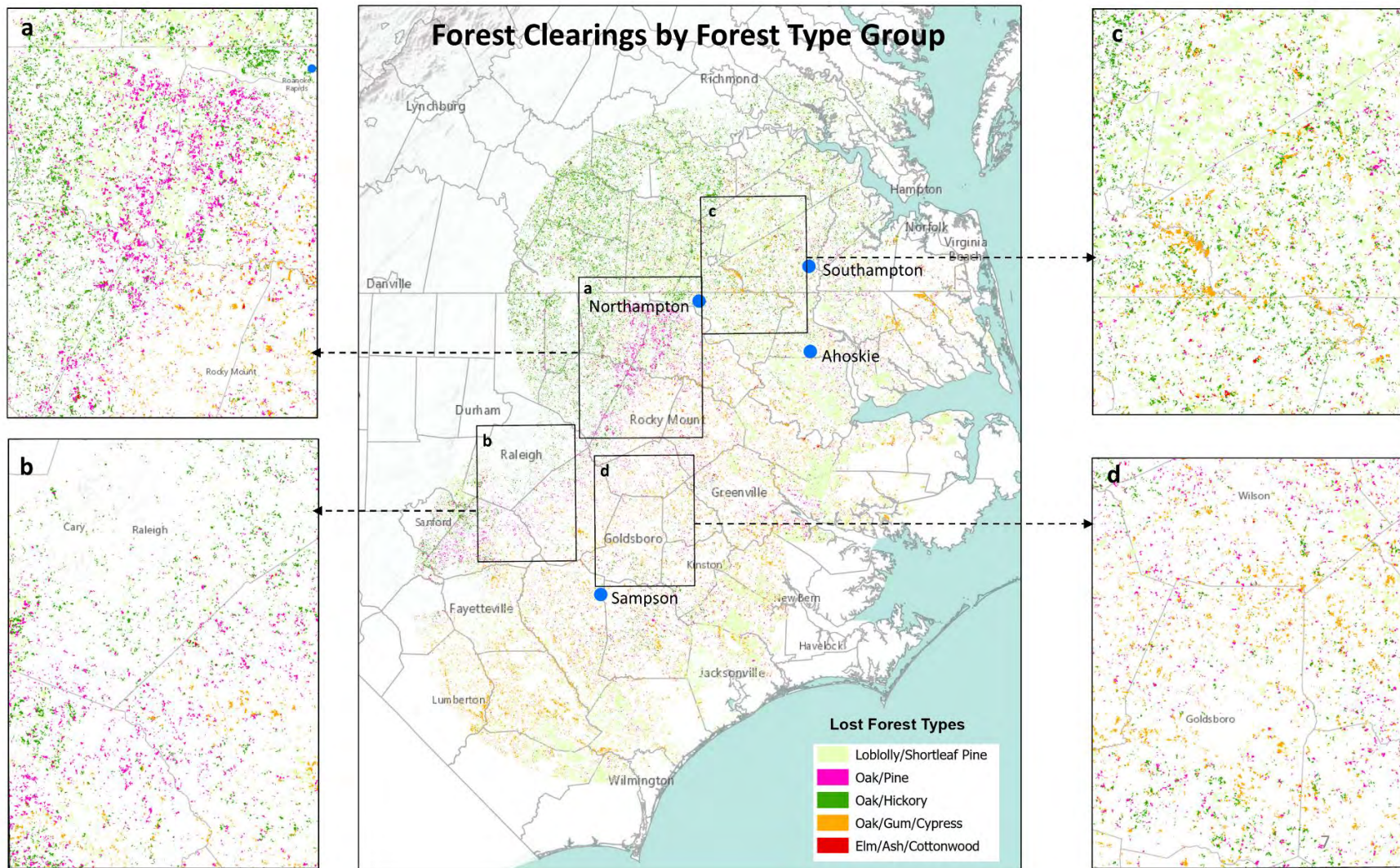
**Figure 5.** Time series of annual gross forest clearings for Oak/Hickory forests within the 3-mill region and reference regions.



**Figure 6.** Time series of annual gross forest clearings for Oak/Gum/Cypress forests within the 3-mill and reference regions.

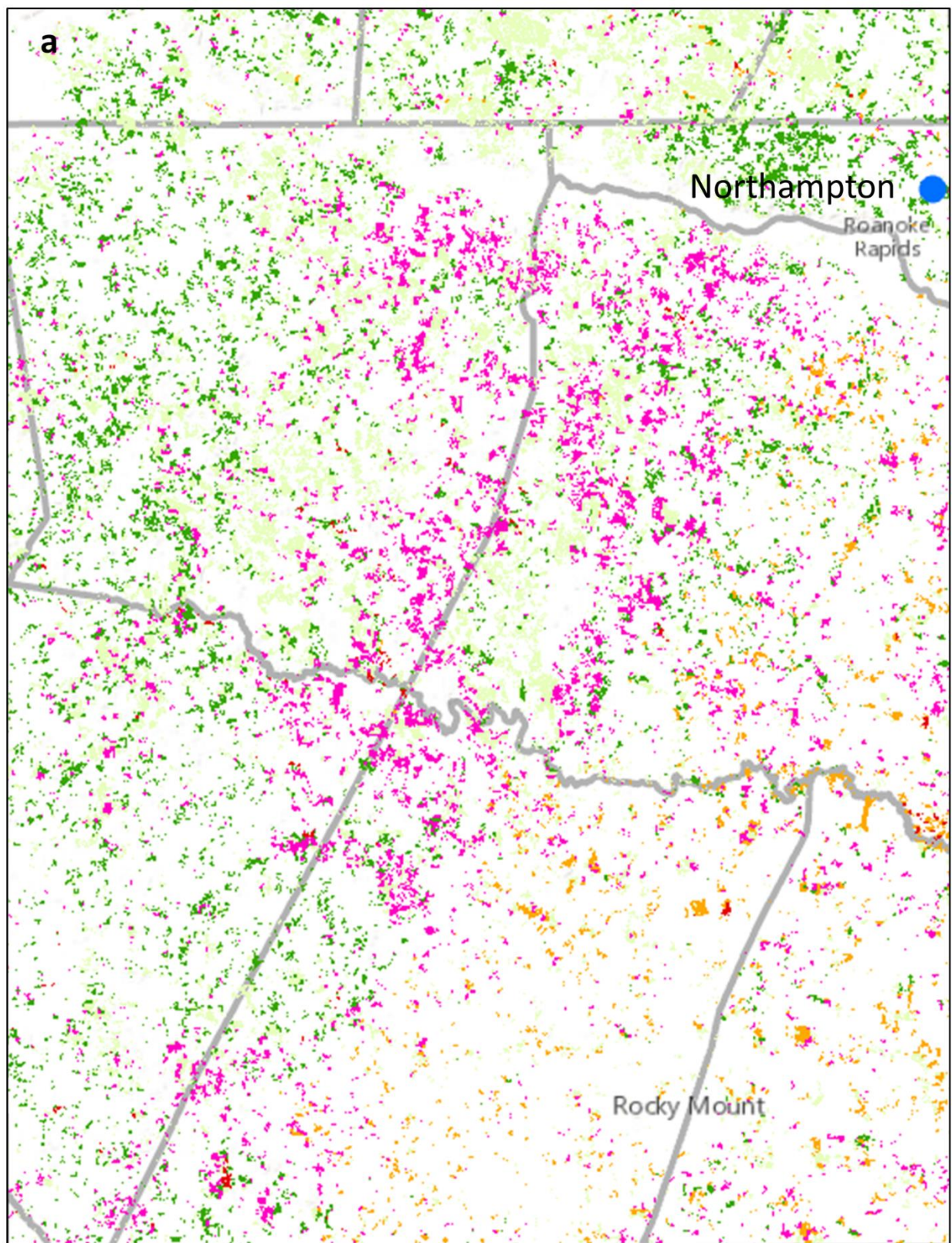


**Figure 7.** Time series of annual gross forest clearings for Loblolly/Shortleaf Pine forests within the 3-mill and reference regions.



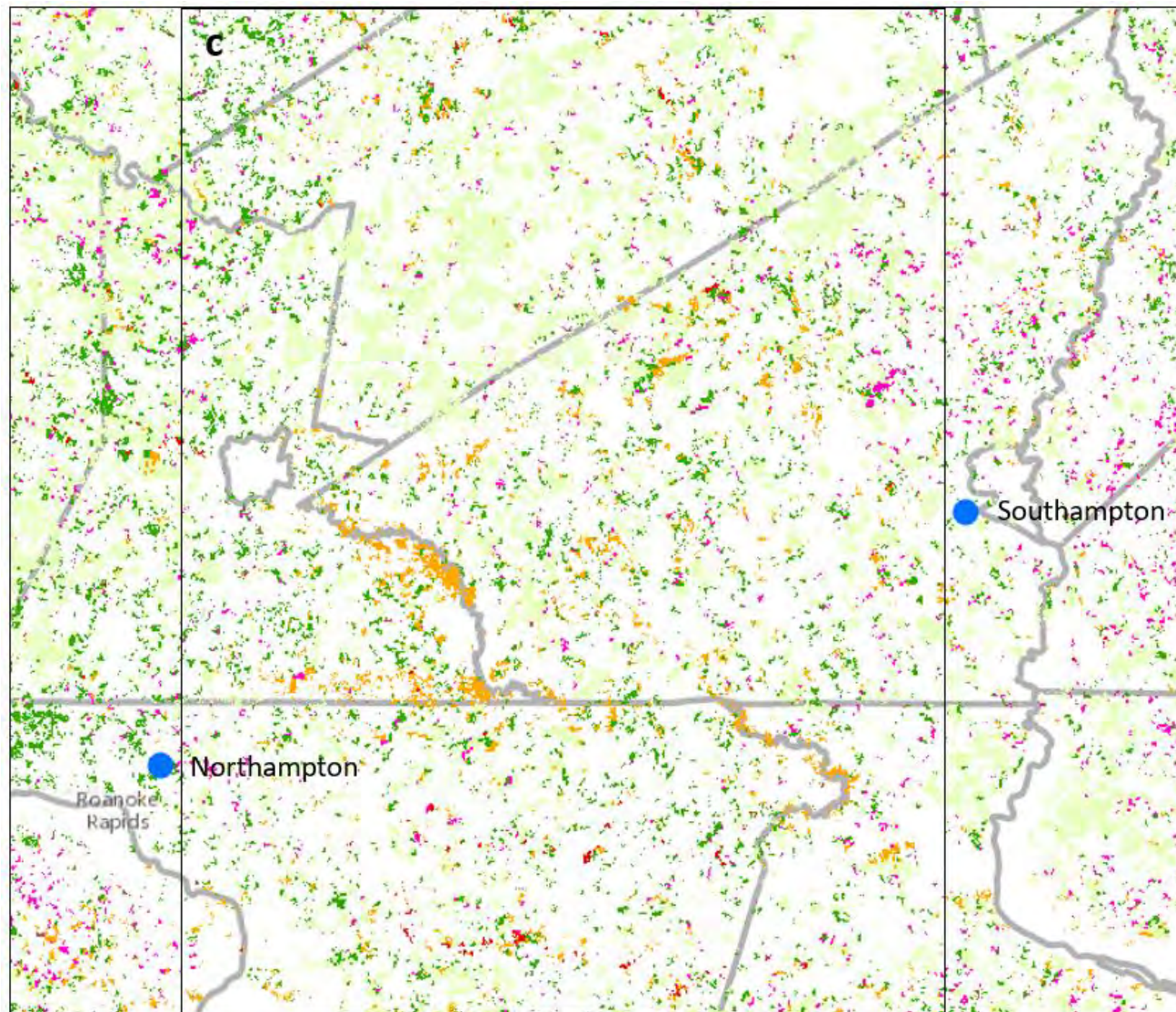
**Figure 8.** Forest clearings from 2001-2019 within the study region mapped by forest type group.





**Figure 9.** Forest clearings within the cutout region a.





**Figure 10.** Forest clearings within the cutout region c (internal black box) shown within an extended landscape to show both Southampton and Northampton mills.

**Table 3.** Forest area in 2000 and the average annual rate of gross forest clearing in select time periods for the 3-mill and reference regions, reported for deciduous and coniferous forests separately.

|            | Forest<br>Area in<br>2000<br>[ha] | 2004 - 2008<br>[ha per yr] [% per yr] |      | 2009 - 2012<br>[ha per yr] [% per yr] |      | 2013 - 2015<br>[ha per yr] [% per yr] |      | 2016 - 2018<br>[ha per yr] [% per yr] |      |
|------------|-----------------------------------|---------------------------------------|------|---------------------------------------|------|---------------------------------------|------|---------------------------------------|------|
| 3-mill     |                                   |                                       |      |                                       |      |                                       |      |                                       |      |
| Deciduous  | 1,062,294                         | 16,425                                | 1.5% | 12,171                                | 1.1% | 16,317                                | 1.5% | 18,480                                | 1.7% |
| Coniferous | 1,106,527                         | 28,830                                | 2.6% | 22,379                                | 2.0% | 26,323                                | 2.4% | 27,179                                | 2.5% |
| Reference  |                                   |                                       |      |                                       |      |                                       |      |                                       |      |
| Deciduous  | 536,166                           | 7,034                                 | 1.3% | 6,603                                 | 1.2% | 7,785                                 | 1.5% | 10,171                                | 1.9% |
| Coniferous | 604,379                           | 13,176                                | 2.2% | 11,833                                | 2.0% | 13,930                                | 2.3% | 17,268                                | 2.9% |

**Table 4.** Forest area in 2000 and the average annual rate of gross forest clearing in select time periods for the 3-mill and reference regions shown for individual forest types.

|                         | Forest<br>Area in<br>2000 | 2004 - 2008 |         | 2009 - 2012 |         | 2013 - 2015 |         | 2016 - 2018 |         |
|-------------------------|---------------------------|-------------|---------|-------------|---------|-------------|---------|-------------|---------|
|                         | [ha]                      | [ha / y]    | [% / y] | [ha / y]    | [% / y] | [ha / y]    | [% / y] | [ha / y]    | [% / y] |
| 3-mill                  |                           |             |         |             |         |             |         |             |         |
| Oak/Pine                | 187,947                   | 3,337       | 1.8%    | 2,612       | 1.4%    | 3,653       | 1.9%    | 3,976       | 2.1%    |
| Oak/Hickory             | 594,475                   | 9,448       | 1.6%    | 7,010       | 1.2%    | 9,311       | 1.6%    | 10,793      | 1.8%    |
| Oak/Gum/Cypress         | 261,445                   | 3,449       | 1.3%    | 2,418       | 0.9%    | 3,149       | 1.2%    | 3,457       | 1.3%    |
| Elm/Ash/Cottonwood      | 18,427                    | 191         | 1.0%    | 132         | 0.7%    | 203         | 1.1%    | 254         | 1.4%    |
| Loblolly/Shortleaf Pine | 1,106,527                 | 28,830      | 2.6%    | 22,379      | 2.0%    | 26,323      | 2.4%    | 27,179      | 2.5%    |
| Deciduous               | 1,062,294                 | 16,425      | 1.5%    | 12,171      | 1.1%    | 16,317      | 1.5%    | 18,480      | 1.7%    |
| Coniferous              | 1,106,527                 | 28,830      | 2.6%    | 22,379      | 2.0%    | 26,323      | 2.4%    | 27,179      | 2.5%    |
| Reference               |                           |             |         |             |         |             |         |             |         |
| Oak/Pine                | 118,990                   | 1,730       | 1.5%    | 1,559       | 1.3%    | 1,796       | 1.5%    | 2,602       | 2.2%    |
| Oak/Hickory             | 118,297                   | 1,487       | 1.3%    | 1,265       | 1.1%    | 1,744       | 1.5%    | 2,225       | 1.9%    |
| Oak/Gum/Cypress         | 295,933                   | 3,799       | 1.3%    | 3,766       | 1.3%    | 4,233       | 1.4%    | 5,304       | 1.8%    |
| Elm/Ash/Cottonwood      | 2,946                     | 18          | 0.6%    | 14          | 0.5%    | 13          | 0.4%    | 39          | 1.3%    |
| Loblolly/Shortleaf Pine | 604,379                   | 13,176      | 2.2%    | 11,833      | 2.0%    | 13,930      | 2.3%    | 17,268      | 2.9%    |
| Deciduous               | 536,166                   | 7,034       | 1.3%    | 6,603       | 1.2%    | 7,785       | 1.5%    | 10,171      | 1.9%    |
| Coniferous              | 604,379                   | 13,176      | 2.2%    | 11,833      | 2.0%    | 13,930      | 2.3%    | 17,268      | 2.9%    |



## 4.2 Forest Area Changes, 2001 to 2016

First, we report the area of deciduous forest lost within the 3-mill area according to the NLCD, and focusing only on those areas that are labeled as deciduous forest according to the relatively restrictive classification of the NLCD. We find that the areal extent of NLCD-classified deciduous forest declined within the 3-mill region from 2001 to 2016 with an average annual rate of loss of about 3,861 hectares per year from an initial 320,523 ha in 2001 (Table 5). This is a net loss of NLCD-classified deciduous forest, whereas the prior section analyzed gross forest clearings with the GFW data. Over the 15-year period this translates to a total net loss of about 18.1% of the year-2001 deciduous forest in the 3-mill region, with the annual rate of loss being roughly the same for 2001 to 2011 as for 2011 to 2016. These deciduous forest losses are coincident with smaller gains of mixed forest and coniferous forest, which expanded by 1,387 hectares per year and 505 hectares per year, respectively.

Second, we use the NLCD as a point of comparison for the total forested area estimated with the GFW dataset. To make this comparison it is necessary to combine the NLCD Deciduous, Mixed, and Woody Wetland forest classes together because many of those areas are labeled as deciduous-dominant forest types in this study's forest type assignment to the GFW dataset. When doing so, we find good agreement regarding the area classified as deciduous forest between NLCD and this study's combination of the GFW data with the U.S. Forest Service forest type group map. For the three classes combined, the NLCD reports an average annual net loss of forest area of about 2,313 hectares per year, out of an initial 1.46 million hectares in 2001 across the 3-mill region (Table 5). Over the 15-year period this corresponds to a net loss of 2.4% of the year-2001 Deciduous, Mixed, and Woody Wetland forest areas combined, with the annual rate of loss being comparable for 2001 to 2011 as for 2011 to 2016. By comparison, the reference region saw a 15-year loss of only 1.1% of its year-2001 Deciduous, Mixed, and Woody Wetland forest areas combined by 2016.

**Table 5.** Forest area and the change in forest area from the 2001, 2011, and 2016 NLCD datasets for the 3-mill and reference regions.

| <b>Forest Area [ha]</b>                                    | <b>3-Mill</b> |             |             | <b>Reference</b> |             |             |
|------------------------------------------------------------|---------------|-------------|-------------|------------------|-------------|-------------|
|                                                            | 2001          | 2011        | 2016        | 2001             | 2011        | 2016        |
| Deciduous (NLCD)                                           | 320,523       | 280,473     | 262,615     | 60,490           | 57,792      | 56,252      |
| Mixed                                                      | 456,690       | 472,577     | 477,497     | 125,173          | 125,699     | 126,071     |
| Woody Wetlands                                             | 684,961       | 683,812     | 687,365     | 590,894          | 582,630     | 585,588     |
| Deciduous + Mixed + W.W.                                   | 1,462,174     | 1,436,863   | 1,427,477   | 776,558          | 766,120     | 767,911     |
| Coniferous                                                 | 828,994       | 823,927     | 836,569     | 510,481          | 513,332     | 517,407     |
| All Forest Types                                           | 2,291,168     | 2,260,790   | 2,264,046   | 1,287,039        | 1,279,452   | 1,285,318   |
| <b>Forest Area Change [ha per year]</b>                    | 2011 - 2001   | 2016 - 2011 | 2016 - 2001 | 2011 - 2001      | 2016 - 2011 | 2016 - 2001 |
| Deciduous (NLCD)                                           | -4,005        | -3,572      | -3,861      | -270             | -308        | -283        |
| Mixed                                                      | 1,589         | 984         | 1,387       | 53               | 75          | 60          |
| Woody Wetlands                                             | -115          | 711         | 160         | -826             | 592         | -354        |
| Deciduous + Mixed + W.W.                                   | -2,531        | -1,877      | -2,313      | -1,044           | 358         | -576        |
| Coniferous                                                 | -507          | 2,528       | 505         | 285              | 815         | 462         |
| All Forest Types                                           | -3,038        | 651         | -1,808      | -759             | 1,173       | -115        |
| <b>Forest Area Change<br/>[% over total time interval]</b> | 2011 - 2001   | 2016 - 2011 | 2016 - 2001 | 2011 - 2001      | 2016 - 2011 | 2016 - 2001 |
| Deciduous (NLCD)                                           | -12.50%       | -5.57%      | -18.07%     | -4.46%           | -2.55%      | -7.01%      |
| Mixed                                                      | 3.48%         | 1.08%       | 4.56%       | 0.42%            | 0.30%       | 0.72%       |
| Woody Wetlands                                             | -0.17%        | 0.52%       | 0.35%       | -1.40%           | 0.50%       | -0.90%      |
| Deciduous + Mixed + W.W.                                   | -1.73%        | -0.64%      | -2.37%      | -1.34%           | 0.23%       | -1.11%      |
| Coniferous                                                 | -0.61%        | 1.52%       | 0.91%       | 0.56%            | 0.80%       | 1.36%       |
| All Forest Types                                           | -1.33%        | 0.14%       | -1.18%      | -0.59%           | 0.46%       | -0.13%      |

### 4.3 Feedstock Supplied by the Harvested Area

We estimate that 1.9 million dry tonnes of pellets would be produced each year if all of the deciduous forest clearing within the 3-mill area (18,480 hectares per year) was used to produce wood pellets (Table 6). This is based on an assumed harvest yield of 84 green tonnes of biomass per acre (208 green tonnes of biomass per hectare), and an assumed pellet yield of 0.492 dry tonnes of pellets per green tonnes of biomass furnished (34).

By comparison, Enviva's supply base reports (5-7) indicate that each of the three pellet mills consume 700,000 to 980,000 tonnes of green biomass feedstock per year (Table 6). From 2016 to 2018, the three mills combined to consume 2.33 to 2.66 million green tonnes of biomass feedstock per year. Enviva reports that its pellet feedstock in the region is comprised of 22% pine and 78% hardwood, and with 87% coming from primary feedstock including roundwood and whole trees direct from forests with the remainder as secondary feedstock from residual material provided by sawmill and wood industry suppliers. With 78% of the feedstock being hardwood supply and 87% from primary supply, approximately 68% of the feedstock would be expected to arrive directly from recent hardwood harvests in the region. This equates to 0.78 to 0.89 million dry tonnes of pellets per year of Enviva's 3-mill cluster supply coming from hardwood deciduous and mixed forest harvests. This feedstock would consume 41% to 47% of the total biomass from deciduous forest clearings within the 3-mill area.

**Table 6.** Feedstock supplies for the 3-mill cluster in 2016, 2017, and 2018 from deciduous harvest as reported by Enviva in Supply Base Reports, and the percent of potential production from deciduous forest clearings detected in this study.<sup>1</sup>

|                                                    | 2016                               | 2017      | 2018      |
|----------------------------------------------------|------------------------------------|-----------|-----------|
| <b>Total Pellet Feedstock</b>                      | [green tonnes of biomass per year] |           |           |
| Ahoskie                                            | 706,675                            | 706,675   | 652,083   |
| Northampton                                        | 981,002                            | 908,641   | 862,609   |
| Southampton                                        | 970,670                            | 862,567   | 814,632   |
| Total of Three Mills                               | 2,658,347                          | 2,477,883 | 2,329,324 |
| <b>Pellets from Deciduous Harvesting</b>           | [dry tonnes of pellets per year]   |           |           |
| Ahoskie                                            | 235,988                            | 235,988   | 217,757   |
| Northampton                                        | 327,597                            | 303,433   | 288,061   |
| Southampton                                        | 324,147                            | 288,047   | 272,039   |
| Total of Three Mills                               | 887,732                            | 827,467   | 777,857   |
| <b>Potential Feedstock from Deciduous Clearing</b> | 1,895,914                          | 1,895,914 | 1,895,914 |
| <b>% Potential from Deciduous Clearings</b>        | 47%                                | 44%       | 41%       |

<sup>1</sup> In 2019, Enviva's total pellet feedstock (including primary feedstock from forests) increased at each of the three mills from 2018 (5-7). As reported by Enviva, the 2019 total pellet feedstock (in green tonnes) were: Ahoskie 688,752; Northampton, 1,014,554; Southampton 915,568. For the Southampton and Northampton mills, this increase was above 2017 levels. The same is true for the Enviva Sampson mill, with total pellet feedstock increasing from 852,842 in 2017 and 879,826 in 2018 to 1,016,024 in 2019 (see Enviva Sampson SBP reports 36.

Enviva, "Supply Base Report: Enviva Pellets Sampson, LLC, Fourth Surveillance Audit, available for download at <https://sbp-cert.org/certificate-holders/#4619>," (Sustainable Biomass Program, 2020).).

## 5. Conclusions

With analysis of the GFW forest cover and forest loss data, we find that the rate of forest clearing increased markedly after the initiation of pellet mill operations at Northampton, Southampton, and Ahoskie. By 2013 to 2015, the 3-mill region saw deciduous forest clearing increase by 1.34 times over that in 2009 to 2012, and by 2016 to 2018 it increased to 1.51 times. (Table 4 and section 4.1) The reference region, prior to its pellet mill operations, saw a 2013 to 2015 increase of only 1.18 times over the 2009 to 2012 period. However, once pellet mill operations began within the reference region in 2016, deciduous forest clearing rose to 1.54 times the rate during the recession period. Together, these lines of evidence provide a clear indication that the initiation of pellet mill operations contributed to elevated rates of deciduous forest clearing beginning in the early 2010s for the 3-mill region, and in 2016 for the reference region.

With analysis of NLCD land cover data, we find a net loss of forested area within the 3-mill region, with an average annual loss of 2,313 hectares per year from 2001 to 2016. Over the 15-year period this corresponds to a loss of 2.4% of the year-2001 Deciduous, Mixed, and Woody Wetland forest areas combined. By comparison, the reference region saw a 15-year loss of only 1.1%. Despite some gains in coniferous forest types, the 3-mill region saw a combined net loss of forested area from 2001 to 2016, losing 1.5% of the year-2001 forestland. Forest loss rates were generally steady over the two time intervals of 2001 to 2011 and 2011 to 2016. Thus, pellet mill operations do not appear to have induced an increase in forestland area within the region, and in fact deciduous forestland saw a sizeable and steady decline.

Enviva's supply base reports indicate that from 2016 to 2018 the three mills consumed 2.33 to 2.66 million green tonnes of biomass feedstock per year, with 68% of the feedstock from recent hardwood harvests. This deciduous-only, direct-harvest portion of the total feedstock would support the production of 0.78 to 0.89 million dry tonnes of pellets per year from Enviva's 3-mill cluster supply. This corresponds to 41% to 47% of the total biomass extracted from deciduous forest clearings within the 3-mill area. Therefore, pellet mill operations consume a correspondingly large fraction of the total deciduous forest clearing within the region.

With declining deciduous forest cover in the 3-mill sourcing region and with Enviva consuming 41% to 47% of the total biomass extracted from deciduous forest clearings in the area, it is likely that Enviva sourcing is contributing to overall declining carbon stocks in deciduous forests in the 3-mill area. The fact that the wood pellets made from the feedstock sourced from the area's forests is burned for power generation overseas further worsens the carbon and climate profile of pellet mill operations as a whole.

## 6. Citations

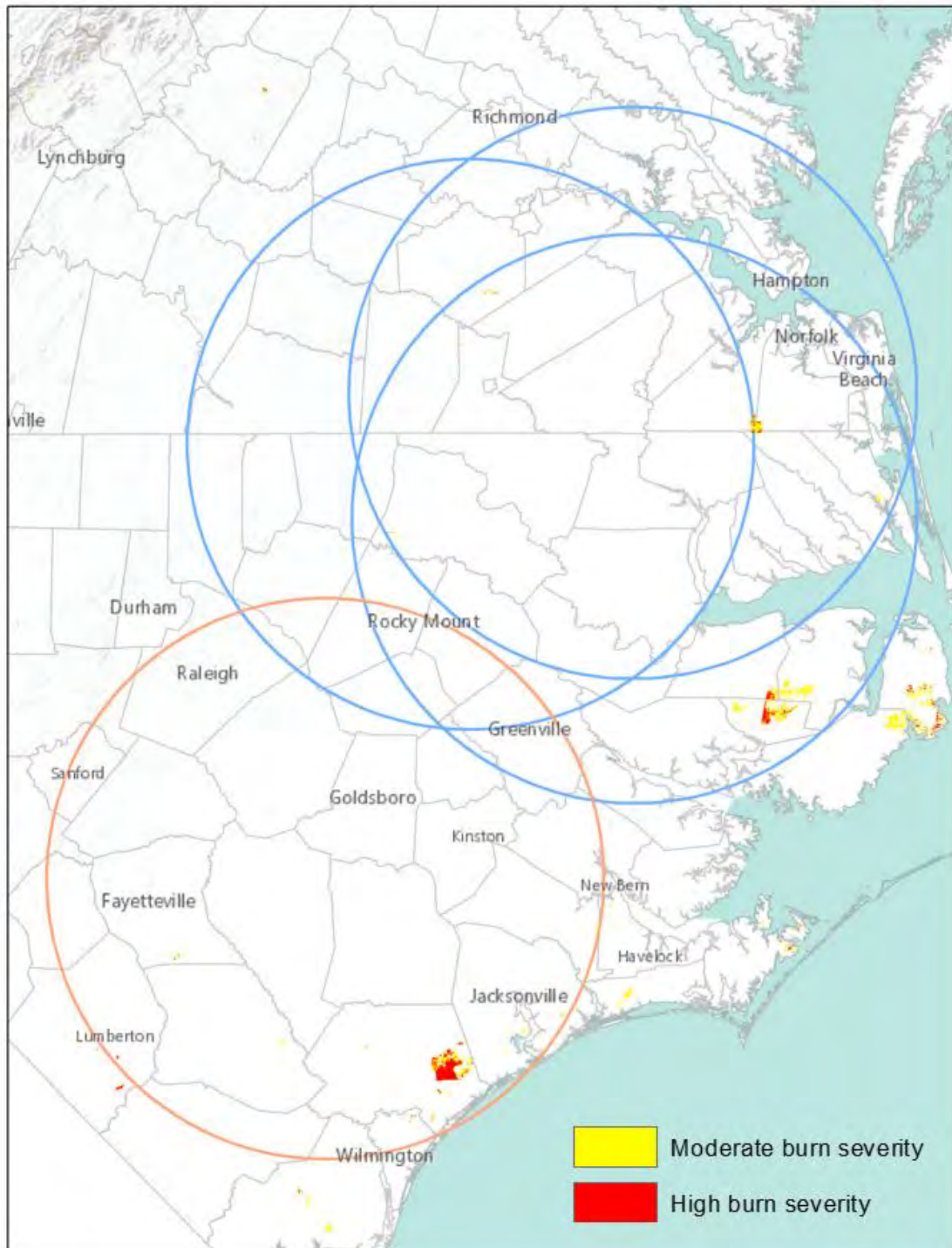
1. K. L. Abt, R. C. Abt, C. S. Galik, K. E. Skog, Effect of policies on pellet production and forests in the US South: a technical document supporting the Forest Service update of the 2010 RPA Assessment. *Gen. Tech. Rep. SRS-202, Asheville, NC: US Department of Agriculture Forest Service, Southern Research Station.* 33 p. **202**, (2014).
2. V. H. Dale, K. L. Kline, E. S. Parish, A. L. Cowie, R. Emory, R. W. Malmshiemer, R. Slade, C. T. SMITH Jr, T. B. Wigley, N. S. Bentsen, G. Berndes, P. Bernier, M. Brandão, H. L. Chum, R. Diaz-Chavez, G. Egnell, L. Gustavsson, J. Schweinle, I. Stupak, P. Trianosky, A. Walter, C. Whittaker, M. Brown, G. Chescheir, I. Dimitriou, C. Donnison, A. Goss Eng, K. P. Hoyt, J. C. Jenkins, K. Johnson, C. A. Levesque, V. Lockhart, M. C. Negri, J. E. Nettles, M. Wellisch, Status and prospects for renewable energy using wood pellets from the southeastern United States. *GCB Bioenergy* **9**, 1296-1305 (2017).
3. E. Voegelé, "USDA: US exports 7.26 million metric tons of wood pellets in 2020," (Biomass Magazine, February 05, 2021, <http://www.biomassmagazine.com/articles/17712/usda-us-exports-7-26-million-metric-tons-of-wood-pellets-in-2020>, 2021).
4. Drax, "Drax Group plc Annual Report and Accounts 2020," ([https://www.drax.com/wp-content/uploads/2021/03/Drax\\_AR2020.pdf](https://www.drax.com/wp-content/uploads/2021/03/Drax_AR2020.pdf) 2021).
5. Enviva, "Supply Base Report: Enviva Pellets Southampton, LLC, Fourth Surveillance Audit, available for download at <https://sbp-cert.org/certificate-holders/#4435>," (Sustainable Biomass Program, 2019).
6. Enviva, "Supply Base Report: Enviva Pellets Northampton, LLC, Fourth Surveillance Audit, available for download at <https://sbp-cert.org/certificate-holders/#4310>," (Sustainable Biomass Program, 2019).
7. Enviva, "Supply Base Report: Enviva Pellets Ahoskie, LLC, Fourth Surveillance Audit, available for download at <https://sbp-cert.org/certificate-holders/#4347>," (Sustainable Biomass Program, 2019).
8. SELC, "Southeast U.S. Wood Pellet Plants Exporting to Europe," ([https://www.southernenvironment.org/uploads/maps/SELC\\_WoodPelletExportMap\\_2021\\_0701\\_map+table.pdf](https://www.southernenvironment.org/uploads/maps/SELC_WoodPelletExportMap_2021_0701_map+table.pdf), 2021).
9. J. Scheck, in *The Wall Street Journal*. (<https://www.wsj.com/articles/SB10001424127887324082604578485491298208114>, 2013).
10. S. Stashwick, R. Frost, D. W. Carr. (Dogwood Alliance, Natural Resources Defense Council, and Southern Environmental Law Center, [https://www.nrdc.org/sites/default/files/media-uploads/9965\\_nrdc\\_2019\\_booklet\\_05\\_em\\_-\\_web\\_version.pdf](https://www.nrdc.org/sites/default/files/media-uploads/9965_nrdc_2019_booklet_05_em_-_web_version.pdf), 2019).
11. E. D. Schulze, C. Koerner, B. E. Law, H. Haberl, S. Luyssaert, Large-scale bioenergy from additional harvest of forest biomass is neither sustainable nor greenhouse gas neutral. *Global Change Biology Bioenergy* **4**, 611-616 (2012).
12. G. Zanchi, N. Pena, N. Bird, Is woody bioenergy carbon neutral? A comparative assessment of emissions from consumption of woody bioenergy and fossil fuel. *GCB Bioenergy* **4**, 761-772 (2012).
13. NRDC, "The Sustainable Biomass Program: Smokescreen for Forest Destruction and Corporate Non-Accountability," (<https://www.nrdc.org/sites/default/files/sustainable-biomass-program-partnership-project-ip.pdf>, 2017).

14. J. Southworth, J. Hartter, M. W. Binford, A. Goldman, C. A. Chapman, L. J. Chapman, P. Omeja, E. Binford, Parks, people and pixels: evaluating landscape effects of an east african national park on its surroundings. *Tropical Conservation Science* **3**, 122-142 (2010).
15. R. E. Kennedy, Z. Yang, W. B. Cohen, E. Pfaff, J. Braaten, P. Nelson, Spatial and temporal patterns of forest disturbance and regrowth within the area of the Northwest Forest Plan. *Remote Sensing of Environment* **122**, 117-133 (2012).
16. M. C. Hansen, High-resolution global maps of 21st-century forest cover change. *Science* **342**, (2013).
17. B. Ruefenacht, M. V. Finco, M. D. Nelson, R. Czaplewski, E. H. Helmer, J. A. Blackard, G. R. Holden, A. J. Lister, D. Salajanu, D. Weyermann, K. Winterberger, Conterminous U.S. and Alaska Forest Type Mapping Using Forest Inventory and Analysis Data. *Photogrammetric Engineering and Remote Sensing* **74**, 1379-1388 (2008).
18. C. A. Williams, N. Hasler, H. Gu, Y. Zhou. (ORNL Distributed Active Archive Center, 2021).
19. J. Fry, G. Xian, S. Jin, J. Dewitz, C. Homer, L. Yang, C. Barnes, N. Herold, J. Wickham, Completion of the 2006 National Land Cover Database for the Conterminous United States. *Photogrammetric Engineering and Remote Sensing* **77**, 858-864 (2011).
20. C. Homer, J. Dewitz, J. Fry, M. Coan, N. Hossain, C. Larson, N. Herold, A. McKerrow, J. N. VanDriel, J. Wickham, Completion of the 2001 National Land Cover Database for the Conterminous United States. *Photogrammetric Engineering and Remote Sensing* **73**, 337-341 (2007).
21. C. G. Homer, J. A. Dewitz, L. Yang, S. Jin, P. Danielson, G. Xian, J. Coulston, N. D. Herold, J. D. Wickham, K. Megown, Completion of the 2011 National Land Cover Database for the conterminous United States-Representing a decade of land cover change information. *Photogrammetric Engineering and Remote Sensing* **81**, 345-354 (2015).
22. S. Jin, L. Yang, P. Danielson, C. Homer, J. Fry, G. Xian, A comprehensive change detection method for updating the National Land Cover Database to circa 2011. *Remote Sensing of Environment* **132**, 159-175 (2013).
23. USGS. (U.S. Geological Survey data release, <https://doi.org/10.5066/P955KPLE>., 2018).
24. J. Eidenshink, B. Schwind, K. Brewer, Z.-L. Zhu, B. Quayle, S. Howard, A project for monitoring trends in burn severity. *Fire Ecology* **3**, 3-21 (2007).
25. D. G. Hodges, A. J. Hartsell, C. Brandeis, T. J. Brandeis, J. W. Bentley, Recession Effects on the Forests and Forest Products Industries of the South. *Forest Products Journal* **61**, 614-624 (2011).
26. C. E. Keegan, C. B. Sorenson, T. A. Morgan, S. W. Hayes, J. M. Daniels, Impact of the Great Recession and Housing Collapse on the Forest Products Industry in the Western United States. *Forest Products Journal* **61**, 625-634 (2011).
27. R. P. Dahal, J. E. Henderson, I. A. Munn, Forest Products Industry Size and Economic Multipliers in the US South. *Forest Products Journal* **65**, 372-380 (2015).
28. T. W. B. a. OECD, a. O. N. A. d. f. The World Bank national accounts data, Ed. (<https://data.worldbank.org/indicator/NY.GDP.MKTP.KD.ZG?end=2019&locations=US&start=1997&view=chart>, 2021).
29. J. R. Townshend, J. G. Masek, C. Huang, E. F. Vermote, F. Gao, S. Channan, J. O. Sexton, M. Feng, R. Narasimhan, D. Kim, Global characterization and monitoring of

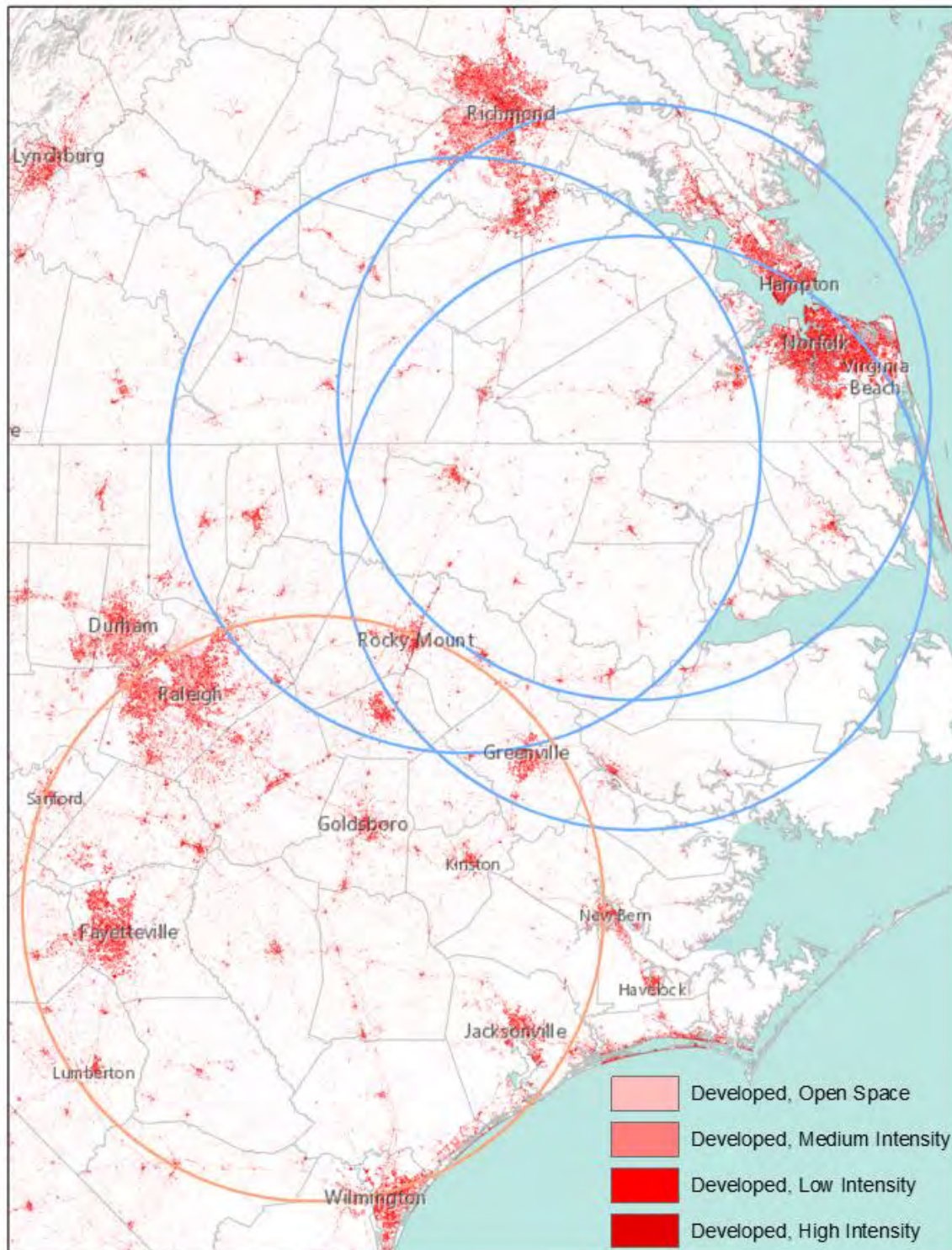


- forest cover using Landsat data: opportunities and challenges. *International Journal of Digital Earth* **5**, 373-397 (2012).
30. M. Feng, J. O. Sexton, C. Huang, A. Anand, S. Channan, X.-P. Song, D.-X. Song, D.-H. Kim, P. Noojipady, J. R. Townshend, Earth science data records of global forest cover and change: Assessment of accuracy in 1990, 2000, and 2005 epochs. *Remote Sensing of Environment* **184**, 73-85 (2016).
  31. Y. Li, D. Sulla-Menashe, S. Motesharrei, X.-P. Song, E. Kalnay, Q. Ying, S. Li, Z. Ma, Inconsistent estimates of forest cover change in China between 2000 and 2013 from multiple datasets: differences in parameters, spatial resolution, and definitions. *Scientific Reports* **7**, 8748 (2017).
  32. M. C. Hansen, S. V. Stehman, P. V. Potapov, Quantification of global gross forest cover loss. *Proceedings of the National Academy of Sciences* **107**, 8650-8655 (2010).
  33. J. O. Sexton, P. Noojipady, A. Anand, X.-P. Song, S. McMahon, C. Huang, M. Feng, S. Channan, J. R. Townshend, A model for the propagation of uncertainty from continuous estimates of tree cover to categorical forest cover and change. *Remote Sensing of Environment* **156**, 418-425 (2015).
  34. S. Phillips, "Acreage required to meet projected biomass pellet demand from the European Union, 2016 – 2030," (Dogwood Alliance, [https://www.southernenvironment.org/uploads/audio/BiomassAcreage\\_Final\\_20160427\(3\).pdf](https://www.southernenvironment.org/uploads/audio/BiomassAcreage_Final_20160427(3).pdf)), 2016).
  35. H. Gu, C. A. Williams, N. Hasler, Y. Zhou. (ORNL Distributed Active Archive Center, 2019).
  36. Enviva, "Supply Base Report: Enviva Pellets Sampson, LLC, Fourth Surveillance Audit, available for download at <https://sbp-cert.org/certificate-holders/#4619>," (Sustainable Biomass Program, 2020).

## Appendix 1 Figures of Areas Excluded from Analysis

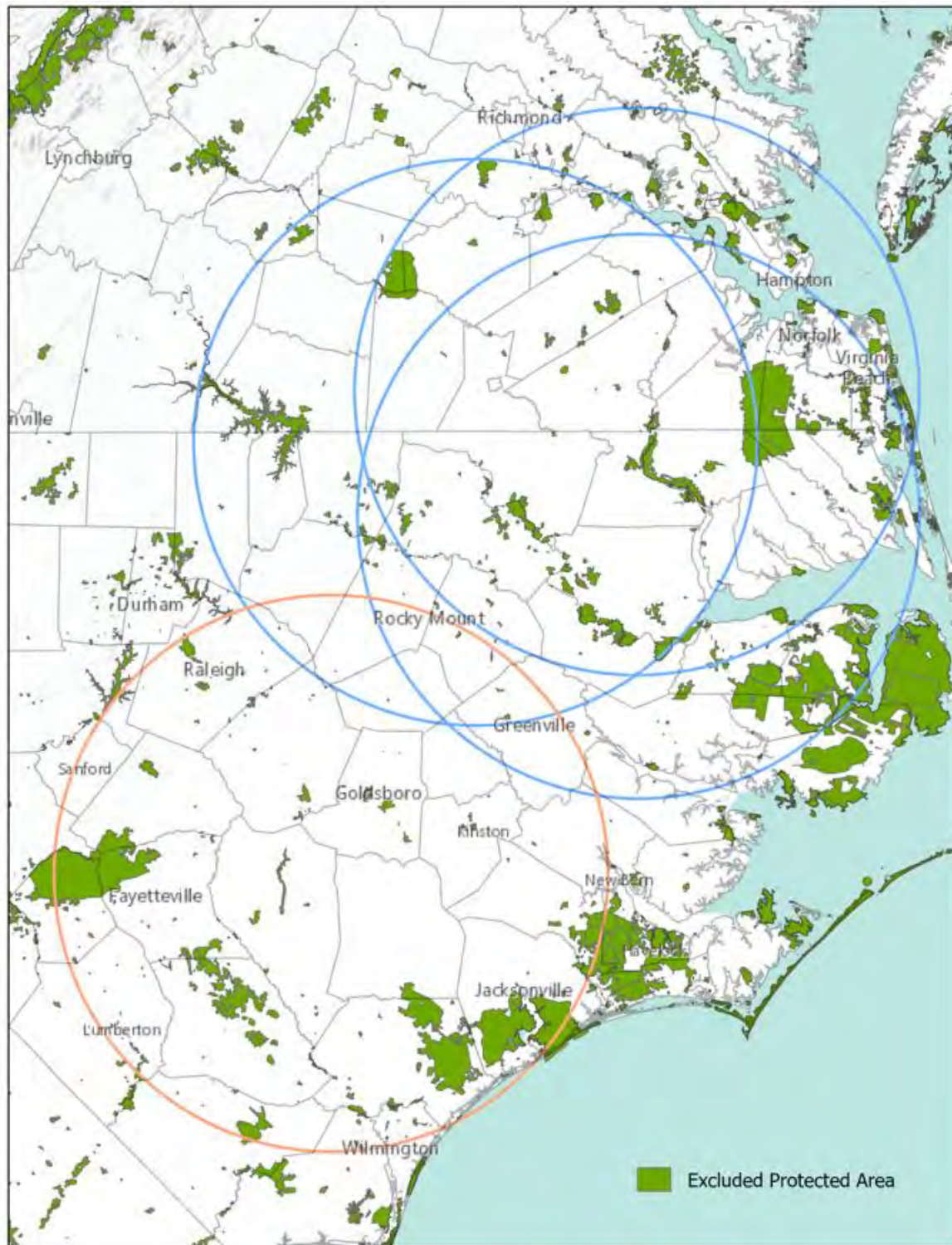


**Figure A1.** Burned areas of moderate and high severity fires excluded from the analysis based on the Monitoring Trends in Burn Severity dataset.



**Figure A2.** Developed lands in 2016 according to the National Land Cover Dataset.





**Figure A3.** Protected areas from the USGS GAP PAD-US 2.0 dataset that are not prone to forest harvesting sourced for pellet mills.

## Appendix 2 Datasets Provided with Report

1. Map data of forest area by forest type group in 2000.
2. Map data of forest clearing by forest type group for each year from 2001 to 2019.
3. Map data of NLCD analysis of forest area by forest type class for 2001, 2011 and 2016.
4. Map data of spatial filters applied for burned areas, developed lands, and protected areas.
5. Excel spreadsheet including:
  - a. Tables and figures of the area of annual forest clearings and percentage cleared by forest type, deciduous forest types and coniferous forest types within 100 km radius of each selected pellet mill, the 3-mill region, the reference region, and the 4 cut-out regions.
  - b. Tables of forest area by each forest type, deciduous, and coniferous types in 2000.
  - c. Table and charts of NLCD forest area and percentage change per year from 2001 to 2011, for 2011 to 2016, and from 2001 to 2016.
  - d. Table of feedstock analysis.
  - e. Table of tree cover percent analysis.
  - f. Tables formatted for inclusion in this final report.

## Appendix 3 Area of Gross Forest Clearings

Annual Area of Gross Forest Clearing by Forest Type Group for Each Pellet Mill Source Region, the 3-Mill Combined Source Region, and the Reference Region

Area of Gross Forest Clearing [hectares]

Northampton Pellet Mill Source region

| Year | Loblolly /<br>Shortleaf Pine | Oak / Pine | Oak / Hickory | Oak / Gum /<br>Cypress | Elm / Ash /<br>Cottonwood | Deciduous | Coniferous |
|------|------------------------------|------------|---------------|------------------------|---------------------------|-----------|------------|
| 2001 | 14370                        | 3370       | 10870         | 2257                   | 159                       | 16656     | 14370      |
| 2002 | 13678                        | 2593       | 10408         | 2163                   | 124                       | 15287     | 13678      |
| 2003 | 14386                        | 2028       | 6604          | 1085                   | 77                        | 9793      | 14386      |
| 2004 | 20408                        | 2870       | 8003          | 1522                   | 148                       | 12542     | 20408      |
| 2005 | 22154                        | 2968       | 8438          | 2035                   | 130                       | 13571     | 22154      |
| 2006 | 22722                        | 2803       | 9549          | 2204                   | 162                       | 14719     | 22722      |
| 2007 | 21847                        | 2887       | 8685          | 2209                   | 139                       | 13920     | 21847      |
| 2008 | 20467                        | 2371       | 7959          | 2442                   | 309                       | 13082     | 20467      |
| 2009 | 18207                        | 2167       | 7213          | 1951                   | 162                       | 11493     | 18207      |
| 2010 | 19378                        | 2655       | 6327          | 1665                   | 131                       | 10777     | 19378      |
| 2011 | 14967                        | 1862       | 6076          | 1448                   | 87                        | 9472      | 14967      |
| 2012 | 15973                        | 2064       | 5791          | 1239                   | 91                        | 9185      | 15973      |
| 2013 | 20065                        | 2746       | 7226          | 1874                   | 170                       | 12016     | 20065      |
| 2014 | 21442                        | 3227       | 8871          | 2446                   | 187                       | 14731     | 21442      |
| 2015 | 20258                        | 3441       | 9454          | 2305                   | 211                       | 15411     | 20258      |
| 2016 | 21662                        | 3693       | 10140         | 2305                   | 294                       | 16432     | 21662      |
| 2017 | 23456                        | 3400       | 10384         | 2971                   | 261                       | 17015     | 23456      |
| 2018 | 21186                        | 3126       | 9170          | 2211                   | 149                       | 14657     | 21186      |
| 2019 | 19504                        | 3181       | 8328          | 2520                   | 152                       | 14180     | 19504      |

Southampton Pellet Mill Source region

| Year | Loblolly /<br>Shortleaf Pine | Oak / Pine | Oak / Hickory | Oak / Gum /<br>Cypress | Elm / Ash /<br>Cottonwood | Deciduous | Coniferous |
|------|------------------------------|------------|---------------|------------------------|---------------------------|-----------|------------|
| 2001 | 12718                        | 2531       | 6807          | 2416                   | 106                       | 11859     | 12718      |
| 2002 | 12176                        | 2007       | 6874          | 2515                   | 98                        | 11494     | 12176      |
| 2003 | 12216                        | 1434       | 3777          | 1331                   | 53                        | 6595      | 12216      |
| 2004 | 18571                        | 2110       | 4326          | 1614                   | 104                       | 8154      | 18571      |
| 2005 | 20951                        | 2136       | 5113          | 2245                   | 130                       | 9623      | 20951      |
| 2006 | 19006                        | 2056       | 5147          | 2642                   | 95                        | 9940      | 19006      |
| 2007 | 19650                        | 2244       | 4842          | 2510                   | 104                       | 9700      | 19650      |
| 2008 | 17324                        | 1722       | 4835          | 2752                   | 263                       | 9572      | 17324      |
| 2009 | 15819                        | 1562       | 4801          | 1922                   | 131                       | 8415      | 15819      |
| 2010 | 17123                        | 1919       | 3982          | 1865                   | 92                        | 7858      | 17123      |
| 2011 | 12181                        | 1222       | 3435          | 1163                   | 68                        | 5888      | 12181      |
| 2012 | 14552                        | 1570       | 3608          | 1160                   | 82                        | 6420      | 14552      |
| 2013 | 17023                        | 1768       | 4113          | 1795                   | 168                       | 7843      | 17023      |
| 2014 | 18429                        | 2120       | 5541          | 2419                   | 138                       | 10218     | 18429      |
| 2015 | 17313                        | 2199       | 5274          | 1965                   | 143                       | 9581      | 17313      |
| 2016 | 18045                        | 2443       | 5299          | 2139                   | 219                       | 10101     | 18045      |
| 2017 | 19419                        | 2207       | 5916          | 2815                   | 224                       | 11162     | 19419      |
| 2018 | 17007                        | 1964       | 4824          | 1995                   | 78                        | 8861      | 17007      |
| 2019 | 16014                        | 2095       | 4797          | 2466                   | 109                       | 9467      | 16014      |



Ahoskie Pellet Mill Source region

| Year | Loblolly /<br>Shortleaf Pine | Oak / Pine | Oak / Hickory | Oak / Gum /<br>Cypress | Elm / Ash /<br>Cottonwood | Deciduous | Coniferous |
|------|------------------------------|------------|---------------|------------------------|---------------------------|-----------|------------|
| 2001 | 15674                        | 2835       | 4658          | 3370                   | 101                       | 10963     | 15674      |
| 2002 | 13784                        | 2330       | 4757          | 3659                   | 91                        | 10838     | 13784      |
| 2003 | 14656                        | 1828       | 2657          | 1996                   | 56                        | 6538      | 14656      |
| 2004 | 19878                        | 2476       | 2993          | 2393                   | 98                        | 7960      | 19878      |
| 2005 | 23703                        | 2650       | 3318          | 3179                   | 107                       | 9254      | 23703      |
| 2006 | 21239                        | 2363       | 3696          | 3580                   | 87                        | 9726      | 21239      |
| 2007 | 21171                        | 2514       | 3074          | 3596                   | 103                       | 9288      | 21171      |
| 2008 | 20313                        | 2044       | 2977          | 3894                   | 241                       | 9156      | 20313      |
| 2009 | 16633                        | 2030       | 3307          | 2705                   | 114                       | 8156      | 16633      |
| 2010 | 18949                        | 2280       | 2885          | 2685                   | 66                        | 7917      | 18949      |
| 2011 | 12831                        | 1583       | 2137          | 1871                   | 60                        | 5650      | 12831      |
| 2012 | 16662                        | 1961       | 2396          | 1966                   | 59                        | 6382      | 16662      |
| 2013 | 18721                        | 2131       | 2839          | 2676                   | 119                       | 7764      | 18721      |
| 2014 | 19615                        | 2633       | 3761          | 3357                   | 120                       | 9872      | 19615      |
| 2015 | 18260                        | 2953       | 3669          | 3017                   | 123                       | 9761      | 18260      |
| 2016 | 19199                        | 3327       | 3941          | 3120                   | 203                       | 10591     | 19199      |
| 2017 | 19622                        | 2879       | 4182          | 3843                   | 208                       | 11112     | 19622      |
| 2018 | 18111                        | 2503       | 3585          | 2941                   | 79                        | 9109      | 18111      |
| 2019 | 17111                        | 2759       | 3368          | 3449                   | 95                        | 9671      | 17111      |

Reference Region Sampson Pellet Mill Source region

| Year | Loblolly /<br>Shortleaf Pine | Oak / Pine | Oak / Hickory | Oak / Gum /<br>Cypress | Elm / Ash /<br>Cottonwood | Deciduous | Coniferous |
|------|------------------------------|------------|---------------|------------------------|---------------------------|-----------|------------|
| 2001 | 10636                        | 1832       | 1669          | 4000                   | 50                        | 7550      | 10636      |
| 2002 | 11215                        | 1584       | 1315          | 3947                   | 22                        | 6868      | 11215      |
| 2003 | 9725                         | 1186       | 1033          | 2703                   | 13                        | 4935      | 9725       |
| 2004 | 12672                        | 1581       | 1377          | 3179                   | 10                        | 6148      | 12672      |
| 2005 | 13445                        | 1744       | 1496          | 4115                   | 7                         | 7362      | 13445      |
| 2006 | 12024                        | 1925       | 1485          | 3767                   | 20                        | 7197      | 12024      |
| 2007 | 14707                        | 1825       | 1689          | 4305                   | 42                        | 7861      | 14707      |
| 2008 | 13035                        | 1576       | 1386          | 3627                   | 13                        | 6603      | 13035      |
| 2009 | 11375                        | 1397       | 955           | 3707                   | 9                         | 6068      | 11375      |
| 2010 | 12455                        | 1746       | 1383          | 4169                   | 10                        | 7307      | 12455      |
| 2011 | 11110                        | 1476       | 1353          | 3641                   | 16                        | 6486      | 11110      |
| 2012 | 12392                        | 1615       | 1368          | 3547                   | 22                        | 6552      | 12392      |
| 2013 | 13889                        | 1720       | 1466          | 3995                   | 17                        | 7199      | 13889      |
| 2014 | 14534                        | 1728       | 1781          | 3941                   | 11                        | 7460      | 14534      |
| 2015 | 13368                        | 1939       | 1984          | 4762                   | 10                        | 8695      | 13368      |
| 2016 | 16382                        | 2458       | 2120          | 5001                   | 34                        | 9612      | 16382      |
| 2017 | 19269                        | 2976       | 2641          | 5893                   | 58                        | 11568     | 19269      |
| 2018 | 16154                        | 2374       | 1913          | 5019                   | 27                        | 9332      | 16154      |
| 2019 | 14360                        | 1907       | 1703          | 4583                   | 18                        | 8211      | 14360      |

| 3-Mill Combined Source region |                              |            |               |                        |                           |           |            |
|-------------------------------|------------------------------|------------|---------------|------------------------|---------------------------|-----------|------------|
| Year                          | Loblolly /<br>Shortleaf Pine | Oak / Pine | Oak / Hickory | Oak / Gum /<br>Cypress | Elm / Ash /<br>Cottonwood | Deciduous | Coniferous |
| 2001                          | 19776                        | 4033       | 11989         | 3480                   | 165                       | 19666     | 19776      |
| 2002                          | 17627                        | 3155       | 11575         | 3748                   | 139                       | 18617     | 17627      |
| 2003                          | 19607                        | 2399       | 7464          | 2077                   | 83                        | 12022     | 19607      |
| 2004                          | 26796                        | 3395       | 8727          | 2496                   | 155                       | 14773     | 26796      |
| 2005                          | 31017                        | 3615       | 9387          | 3298                   | 152                       | 16452     | 31017      |
| 2006                          | 29233                        | 3365       | 10371         | 3677                   | 176                       | 17589     | 29233      |
| 2007                          | 28662                        | 3465       | 9633          | 3706                   | 147                       | 16951     | 28662      |
| 2008                          | 28442                        | 2844       | 9122          | 4071                   | 325                       | 16361     | 28442      |
| 2009                          | 22626                        | 2602       | 7898          | 2810                   | 177                       | 13486     | 22626      |
| 2010                          | 25749                        | 3055       | 7026          | 2821                   | 143                       | 13045     | 25749      |
| 2011                          | 19190                        | 2198       | 6629          | 2000                   | 103                       | 10930     | 19190      |
| 2012                          | 21949                        | 2591       | 6489          | 2040                   | 104                       | 11223     | 21949      |
| 2013                          | 25789                        | 3157       | 7952          | 2751                   | 196                       | 14057     | 25789      |
| 2014                          | 27555                        | 3744       | 9706          | 3514                   | 199                       | 17163     | 27555      |
| 2015                          | 25624                        | 4059       | 10276         | 3182                   | 213                       | 17730     | 25624      |
| 2016                          | 27172                        | 4384       | 10957         | 3273                   | 317                       | 18932     | 27172      |
| 2017                          | 28382                        | 3962       | 11388         | 4013                   | 284                       | 19647     | 28382      |
| 2018                          | 25983                        | 3582       | 10036         | 3086                   | 159                       | 16863     | 25983      |
| 2019                          | 24533                        | 3726       | 9265          | 3577                   | 159                       | 16728     | 24533      |

| Cut-Out A region |                              |            |               |                        |                           |           |            |
|------------------|------------------------------|------------|---------------|------------------------|---------------------------|-----------|------------|
| Year             | Loblolly /<br>Shortleaf Pine | Oak / Pine | Oak / Hickory | Oak / Gum /<br>Cypress | Elm / Ash /<br>Cottonwood | Deciduous | Coniferous |
| 2001             | 1488                         | 885        | 1365          | 442                    | 32                        | 2725      | 1488       |
| 2002             | 1184                         | 732        | 1303          | 335                    | 38                        | 2408      | 1184       |
| 2003             | 2378                         | 1015       | 1281          | 171                    | 12                        | 2479      | 2378       |
| 2004             | 2320                         | 983        | 1051          | 220                    | 16                        | 2269      | 2320       |
| 2005             | 2438                         | 1265       | 1058          | 329                    | 6                         | 2657      | 2438       |
| 2006             | 2622                         | 1131       | 1298          | 273                    | 22                        | 2724      | 2622       |
| 2007             | 2456                         | 1191       | 1132          | 359                    | 34                        | 2716      | 2456       |
| 2008             | 2098                         | 771        | 889           | 403                    | 65                        | 2128      | 2098       |
| 2009             | 1807                         | 970        | 865           | 285                    | 43                        | 2162      | 1807       |
| 2010             | 2868                         | 1153       | 1198          | 211                    | 50                        | 2613      | 2868       |
| 2011             | 1790                         | 674        | 820           | 310                    | 21                        | 1824      | 1790       |
| 2012             | 1978                         | 793        | 958           | 203                    | 12                        | 1966      | 1978       |
| 2013             | 2862                         | 1145       | 1087          | 163                    | 16                        | 2410      | 2862       |
| 2014             | 2881                         | 1506       | 1489          | 355                    | 44                        | 3393      | 2881       |
| 2015             | 2967                         | 1612       | 1677          | 483                    | 25                        | 3797      | 2967       |
| 2016             | 3078                         | 1908       | 1914          | 485                    | 112                       | 4419      | 3078       |
| 2017             | 2678                         | 1294       | 1482          | 568                    | 41                        | 3384      | 2678       |
| 2018             | 2414                         | 1135       | 1343          | 289                    | 54                        | 2820      | 2414       |
| 2019             | 2610                         | 1402       | 1433          | 432                    | 33                        | 3300      | 2610       |

| Cut-Out C region |                              | Oak / Pine | Oak / Hickory | Oak / Gum /<br>Cypress | Elm / Ash /<br>Cottonwood | Deciduous | Coniferous |
|------------------|------------------------------|------------|---------------|------------------------|---------------------------|-----------|------------|
| Year             | Loblolly /<br>Shortleaf Pine |            |               |                        |                           |           |            |
| 2001             | 2607                         | 324        | 1382          | 584                    | 54                        | 2345      | 2607       |
| 2002             | 1814                         | 233        | 1285          | 414                    | 30                        | 1962      | 1814       |
| 2003             | 1994                         | 96         | 544           | 218                    | 14                        | 872       | 1994       |
| 2004             | 2976                         | 163        | 691           | 287                    | 54                        | 1195      | 2976       |
| 2005             | 3161                         | 184        | 878           | 541                    | 64                        | 1668      | 3161       |
| 2006             | 3899                         | 205        | 1307          | 573                    | 40                        | 2125      | 3899       |
| 2007             | 3669                         | 223        | 996           | 627                    | 33                        | 1879      | 3669       |
| 2008             | 3582                         | 150        | 881           | 689                    | 33                        | 1753      | 3582       |
| 2009             | 3291                         | 116        | 871           | 397                    | 25                        | 1409      | 3291       |
| 2010             | 3269                         | 164        | 840           | 529                    | 20                        | 1553      | 3269       |
| 2011             | 2242                         | 131        | 650           | 329                    | 21                        | 1131      | 2242       |
| 2012             | 2409                         | 138        | 564           | 244                    | 9                         | 955       | 2409       |
| 2013             | 3928                         | 147        | 849           | 474                    | 37                        | 1507      | 3928       |
| 2014             | 3660                         | 231        | 1129          | 480                    | 56                        | 1896      | 3660       |
| 2015             | 3009                         | 132        | 983           | 318                    | 69                        | 1502      | 3009       |
| 2016             | 3248                         | 213        | 815           | 336                    | 63                        | 1427      | 3248       |
| 2017             | 3156                         | 245        | 1160          | 665                    | 42                        | 2112      | 3156       |
| 2018             | 3016                         | 228        | 1051          | 428                    | 9                         | 1715      | 3016       |
| 2019             | 2918                         | 176        | 846           | 656                    | 18                        | 1696      | 2918       |

**[end of report]**

**AIR EMISSION TEST REPORT**  
**Wiggins, Mississippi Wood Pellet Production Facility**  
**Enviva Pellets Wiggins, LLC**

Submitted to

Enviva Pellets Wiggins, LLC

Submitted by

Air Control Techniques, P.C.  
301 East Durham Road  
Cary, NC 29513  
(919) 460-7811

Report Submittal Date: October 31, 2013  
(Revised November 14, 2013)  
Air Control Techniques, P.C. File 1911



**TABLE OF CONTENTS**

|                   |                                                               |           |
|-------------------|---------------------------------------------------------------|-----------|
| <b>1.</b>         | <b>Summary</b>                                                | <b>1</b>  |
| <b>2.</b>         | <b>Emission Test Program Description</b>                      | <b>3</b>  |
|                   | 2.1 Wiggins, Mississippi Plant Description                    | 3         |
|                   | 2.2 Purpose and Scope of the Emission Test Program            | 3         |
|                   | 2.3 Test Participants                                         | 4         |
| <b>3.</b>         | <b>Test Matrix and Test Results</b>                           | <b>6</b>  |
|                   | 3.1 Test Matrix                                               | 6         |
|                   | 3.2 Test Results                                              | 6         |
|                   | 3.3 Emission Data Evaluation                                  | 14        |
|                   | 3.4 VOC and HAP Emission Summary                              | 16        |
| <b>4.</b>         | <b>Sampling Locations</b>                                     | <b>18</b> |
|                   | 4.1 Dryer 1 Stack Sampling Location                           | 18        |
|                   | 4.2 Dryer 2 Stack Sampling Location                           | 19        |
|                   | 4.3 Dry Hammermill 2 Cyclone Outlet Sampling Location         | 20        |
|                   | 4.4 Pellet Mill Aspiration System Sampling Location           | 21        |
|                   | 4.5 Pellet Cooler 2 Stack Sampling Location                   | 22        |
|                   | 4.6 Pellet Cooler 1 Stack Sampling Location                   | 23        |
|                   | 4.7 Green Hammermill Stack Sampling Location                  | 24        |
| <b>5.</b>         | <b>Testing Procedures</b>                                     | <b>25</b> |
|                   | 5.1 Flue Gas Velocity and Volumetric Flow Rate – EPA Method 2 | 25        |
|                   | 5.2 Flue Gas Composition and Molecular Weight – EPA Method 3  | 25        |
|                   | 5.3 Flue Gas Moisture – EPA Method 4                          | 25        |
|                   | 5.4 Total Hydrocarbon Concentrations – EPA Method 25A         | 25        |
|                   | 5.5 Organic HAPs – EPA Method 320                             | 26        |
| <b>6.</b>         | <b>Quality Assurance</b>                                      | <b>28</b> |
|                   | 6.1 Method 1 Quality Assurance                                | 28        |
|                   | 6.2 Method 4 Quality Assurance                                | 28        |
|                   | 6.3 Method 25A Quality Assurance                              | 28        |
|                   | 6.4 Method 320 Quality Assurance                              | 33        |
| <b>7.</b>         | <b>Process Documentation</b>                                  | <b>35</b> |
| <b>8.</b>         | <b>References</b>                                             | <b>36</b> |
| <b>Appendices</b> |                                                               |           |
|                   | <b>A. Moisture and Gas Flow Rate Data</b>                     |           |
|                   | <b>B. Method 25A Data</b>                                     |           |
|                   | <b>C. Method 320 Data</b>                                     |           |
|                   | <b>D. Method 320 Log Sheet</b>                                |           |
|                   | <b>E. Example Calculations</b>                                |           |
|                   | <b>F. Gas Cylinder Certification Sheets</b>                   |           |
|                   | <b>G. Equipment Calibration Sheets</b>                        |           |



**TABLES**

|       |                                                                               |    |
|-------|-------------------------------------------------------------------------------|----|
| 1-1.  | Total Emissions at Plant Permit Limit of 185,550 ODT per Year                 | 1  |
| 1-2   | Total Emissions at Plant Permit Limit of 140,000 ODT per Year                 | 2  |
| 3-1   | Test Matrix, Air Emission Testing, Enviva Pellets Wiggins, MS                 | 6  |
| 3-2   | Green Hammermill Emission Test Results                                        | 7  |
| 3-3   | Dryer 1 Emission Test Results                                                 | 8  |
| 3-4   | Pellet Cooler 1 Emission Test Results                                         | 9  |
| 3-5   | Dryer 2 Emission Test Results                                                 | 10 |
| 3-6   | Dry Hammermill 2 Emission Test Results                                        | 11 |
| 3-7   | Pellet Cooler 2 Emission Test Results                                         | 12 |
| 3-8   | Aspiration System Emission Test Results                                       | 13 |
| 3-9   | Alpha-Pinene Method 25A Response Factors                                      | 15 |
| 3-10  | Calculated Method 25A Response Factors in Phase I Laboratory Tests            | 15 |
| 3-11. | Total Emissions at Plant Permit Limit of 185,550 ODT per Year                 | 17 |
| 3-12  | Total Emissions at Plant Permit Limit of 140,000 ODT per Year                 | 17 |
| 6-1   | Dryer 1 Quality Assurance Results, Total Hydrocarbons, Method 25A             | 29 |
| 6-2   | Pellet Cooler 1 Quality Assurance Results, Total Hydrocarbons, Method 25A     | 29 |
| 6-3   | Dryer 2 Quality Assurance Results, Total Hydrocarbons, High Range, Method 25A | 30 |
| 6-4   | Dryer 2 Quality Assurance Results, Total Hydrocarbons, Low Range, Method 25A  | 30 |
| 6-5   | Dry Hammermill 2 Quality Assurance Results, Total Hydrocarbons, Method 25A    | 31 |
| 6-6   | Pellet Cooler 2 Quality Assurance Results, Total Hydrocarbons, Method 25A     | 31 |
| 6-7   | Aspiration System Quality Assurance Results, Total Hydrocarbons, Method 25A   | 32 |
| 6-8   | Green Hammermill Quality Assurance Results, Total Hydrocarbons, Method 25A    | 32 |
| 6-9   | CTS Results, Method 320                                                       | 33 |
| 6-10  | Spike Recovery Results, Method 320                                            | 34 |

**FIGURES**

|      |                                                                   |    |
|------|-------------------------------------------------------------------|----|
| 4-1  | Dryer 1 Stack Sampling Location                                   | 18 |
| 4-2  | Photograph of the Dryer 1 Stack                                   | 18 |
| 4-3  | Dryer 2 Stack Sampling Location                                   | 19 |
| 4-4  | Photograph of the Dryer 2 Stack                                   | 19 |
| 4-5  | Dry Hammermill 2 Sampling Location                                | 20 |
| 4-6  | Photograph of the Dry Hammermill 2 Sampling Location              | 20 |
| 4-7  | Pellet Mill Aspiration System Sampling Location                   | 21 |
| 4-8  | Photograph of the Pellet Mill Aspiration System Sampling Location | 21 |
| 4-9  | Pellet Mill 2 Cooler Stack Sampling Location                      | 22 |
| 4-10 | Photograph of the Pellet Mill 2 Cooler Stack Sampling Location    | 22 |
| 4-11 | Pellet Mill 1 Cooler Stack Sampling Location                      | 23 |
| 4-12 | Photograph of the Pellet Mill 1 Cooler Stack Sampling Location    | 23 |
| 4-13 | Green Hammermill Stack Sampling Location                          | 24 |
| 4-14 | Photograph of the Green Hammermill Stack Sampling Location        | 24 |
| 5-1  | Method 320 Organic HAP Sampling System                            | 26 |

## Definitions

|                            |                                                                                                                                                                                                                                                                                                                              |
|----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Total Hydrocarbons         | All organic compounds containing hydrogen and carbon that are detected by a flame ionization detector operated in accordance with U.S. EPA Method 25A.                                                                                                                                                                       |
| Volatile Organic Compounds | All organic compounds that are emitted to the atmosphere in a gaseous or vapor form that can participate in photochemical reactions to produce ozone. All volatile organic compounds are considered VOCs unless specifically exempted in 40 CFR 51.100(s). Relevant excluded compounds include methane, ethane, and acetone. |
| VOC Emissions              | Mass emissions of VOC measured on a pounds of carbon basis.                                                                                                                                                                                                                                                                  |

## Acronyms

|      |                                                 |
|------|-------------------------------------------------|
| EPA  | U.S. Environmental Protection Agency            |
| FID  | Flame Ionization Detector                       |
| FTIR | Fourier Transform Infrared Spectrometer         |
| HAP  | Hazardous Air Pollutant                         |
| MC   | Moisture Content                                |
| MDEQ | Mississippi Department of Environmental Quality |
| ODT  | Oven Dried Tons                                 |
| THC  | Total Hydrocarbons                              |
| VOC  | Volatile Organic Compounds                      |
| C1   | Carbon                                          |

## Units of Measure

|                    |                               |
|--------------------|-------------------------------|
| ppm                | Parts per million (wet basis) |
| ppmvd              | Parts per million (dry basis) |
| ppm C <sub>3</sub> | Parts per million as propane  |
| ppm C <sub>1</sub> | Parts per million as carbon   |
| mg                 | Milligram                     |
| kg                 | Kilogram                      |
| µg                 | Micrograms                    |

## Permit Designations/Titles

|                   |                                                             |
|-------------------|-------------------------------------------------------------|
| Dryer 1           | AA-001, 30 MMBTU Wood-Fired Dryer (No. 1) with a Multiclone |
| Dryer 2           | AA-002, 45 MMBTU Wood Fired Dryer (No. 2) with a Cyclone    |
| Dry Hammermill 1  | AA-006, No. 1 Secondary Hammermill w/High-Eff. Cyclone      |
| Dry Hammermill 2  | AA-007, No. 2 Secondary Hammermill w/High-Eff. Cyclone      |
| Pellet Cooler 1   | AA-004, Includes Line 1 Press Aspiration (AA-012)           |
| Pellet Cooler 2   | AA-014, Pellet Cooler 2 w/Hi-Efficiency Cyclone             |
| Aspiration System | AA-013, Line 2 Pellet Mill Aspiration System                |
| Green Hammermill  | AA-016 (Hammermill Bin)                                     |

## Air Emission Test Report Wiggins, Mississippi Wood Pellet Production Facility

### 1. SUMMARY

Enviva Pellets, Wiggins, LLC (Enviva) has sponsored air emission testing to satisfy the requirements of Agreed Order 6366-13 dated June 16, 2013 (the “Order”). These test results are being submitted to the Mississippi Department of Environmental Quality (MDEQ) by October 31, 2013 in accordance with the Order.

The scope of the testing program included volatile organic compounds (VOCs) and six organic hazardous air pollutants (HAPs). Annual emissions of each analyte have been calculated and compared to applicable permit limits. The results of the testing program are summarized in Table 1-1 based on the present maximum permitted production limit of 185,550 ODT per year in the permit.

| Table 1-1. Total Emissions at Plant Permit Limit of 185,550 ODT/Year |         |         |                  |                  |                 |                 |           |                  |       |
|----------------------------------------------------------------------|---------|---------|------------------|------------------|-----------------|-----------------|-----------|------------------|-------|
| Analyte                                                              | Dryer 1 | Dryer 2 | Dry Hammermill 2 | Green Hammermill | Pellet Cooler 1 | Pellet Cooler 2 | Aspirator | Dry Hammermill 1 | Total |
| Total VOC                                                            | 66.3    | 57.6    | 11.1             | 21.1             | 15.7            | 7.8             | 46.4      | 7.4              | 233.5 |
| Organic HAPs                                                         |         |         |                  |                  |                 |                 |           |                  |       |
| Methanol                                                             | 1.85    | 7.26    | 0.08             | 0.27             | 0.16            | 0.24            | 0.34      | 0.05             | 10.3  |
| Acetaldehyde                                                         | 0.00    | 1.40    | 0.25             | 0.61             | 0.39            | 0.35            | 0.23      | 0.17             | 2.0   |
| Acrolein                                                             | 1.03    | 2.32    | 0.43             | 1.24             | 0.77            | 0.68            | 0.20      | 0.29             | 7.0   |
| Formaldehyde                                                         | 2.01    | 3.48    | 0.39             | 0.37             | 0.49            | 0.34            | 0.03      | 0.26             | 7.4   |
| Phenol                                                               | 0.00    | 0.00    | 0.00             | 0.00             | 0.39            | 0.00            | 0.00      | 0.00             | 0.4   |
| Propionaldehyde                                                      | 1.06    | 1.82    | 0.17             | 0.09             | 0.16            | 0.11            | 0.00      | 0.11             | 3.5   |
| Total HAPS                                                           | 5.96    | 14.87   | 1.32             | 2.59             | 2.35            | 1.72            | 0.80      | 0.88             | 31.89 |

At the current maximum permitted production limit, VOC emissions remain below the PSD threshold of 250 tons per year. However, HAP emissions exceed the 25 ton per year threshold for major source classification, and methanol exceeds the 10 ton per year single compound threshold for major source classification. Importantly, the plant has never operated at the maximum permitted production limit of 185,550 ODT per year.

Enviva plans to propose to MDEQ a new maximum permitted production limit of 140,000 ODT/year. VOC and HAP emissions based on this proposed maximum permitted production limit are summarized in Table 1-2. Like the current limit of 185,000 ODT/year, to date, the Wiggins plant has also never achieved 140,000 ODT/year.

VOC emissions at the newly proposed production rate limit would be well below the PSD threshold of 250 tons per year. Furthermore, combined HAPs emissions are less than 25 tons per year, and none of the HAPs are emitted at more than 10 tons per year. Because the plant has never achieved a production rate of 140,000 ODT/year, the plant has never exceeded the major source threshold for VOCs or HAPs.

| Table 1-2. Total Emissions at Plant Permit Limit of 140,000 ODT/Year |         |         |                  |                  |                 |                 |           |                  |       |
|----------------------------------------------------------------------|---------|---------|------------------|------------------|-----------------|-----------------|-----------|------------------|-------|
| Analyte                                                              | Dryer 1 | Dryer 2 | Dry Hammermill 2 | Green Hammermill | Pellet Cooler 1 | Pellet Cooler 2 | Aspirator | Dry Hammermill 1 | Total |
| Total VOC                                                            | 50.1    | 43.4    | 8.4              | 15.9             | 11.7            | 5.9             | 35.0      | 5.6              | 175.9 |
| Organic HAPs                                                         |         |         |                  |                  |                 |                 |           |                  |       |
| Methanol                                                             | 1.40    | 5.48    | 0.06             | 0.21             | 0.12            | 0.18            | 0.26      | 0.04             | 7.7   |
| Acetaldehyde                                                         | 0.00    | 1.06    | 0.19             | 0.46             | 0.29            | 0.26            | 0.17      | 0.12             | 2.6   |
| Acrolein                                                             | 0.78    | 1.75    | 0.33             | 0.93             | 0.58            | 0.51            | 0.15      | 0.22             | 5.3   |
| Formaldehyde                                                         | 1.52    | 2.62    | 0.30             | 0.28             | 0.37            | 0.26            | 0.03      | 0.20             | 5.6   |
| Phenol                                                               | 0.00    | 0.00    | 0.00             | 0.00             | 0.29            | 0.00            | 0.00      | 0.00             | 0.3   |
| Propionaldehyde                                                      | 0.80    | 1.37    | 0.13             | 0.07             | 0.12            | 0.08            | 0.00      | 0.08             | 2.7   |
| Total HAPS                                                           | 4.50    | 12.28   | 0.99             | 1.95             | 1.78            | 1.30            | 0.61      | 0.66             | 24.06 |

These tests were conducted in accordance with the emission test protocol<sup>[1]</sup> submitted to MDEQ on July 31, 2013. The scope of the emission test program was increased since submittal of the test program protocol in order to ensure that Enviva evaluated emissions from all possible sources of VOCs and HAPs.

The air emission tests were conducted by Air Control Techniques, P.C. using EPA Reference Methods 1, 2, 3, 4, 25A, and 320. The emission tests were conducted from Thursday, October 10 through Sunday, October 13, 2013. This report summarizes the emissions test data, quality assurance data, test method procedures, sampling equipment calibrations, process operating conditions, and test program participants.

## **2. EMISSION TEST PROGRAM DESCRIPTION**

### **2.1 Wiggins, Mississippi Plant Description**

Enviva operates a plant producing wood pellets. The plant consists of a wood receiving yard, log debarkers and chippers, two rotary dryers, two hammermills, two pellet presses and coolers, and an aspiration system. The plant processes wood composed of a range of hardwoods and softwoods.

### **2.2 Purpose and Scope of the Emission Test Program**

Based on a voluntary self-evaluation, Enviva reported to the Mississippi Department of Environmental Quality (MDEQ) that it may have underreported emissions of volatile organic compounds (VOCs) in its permit application. Enviva's concern was based on a set of engineering-oriented tests<sup>[2]</sup> conducted in November 2012 that indicated that VOC emissions from a hammermill source and a press cooler aspiration vent may be higher than previously known. While emissions from specific wood pellet plants are highly dependent on the specific equipment employed and to a lesser degree the hardwood/softwood mix of raw material, Enviva's preliminary findings in the November 2012 engineering test are generally consistent with other recent findings in the Wood Pellet Industry, specifically the engineering-oriented tests<sup>[3]</sup> at a Georgia Biomass, Inc. plant in Waycross, Georgia and Green Circle Bio Energy in Cottondale, Florida.

This air emission testing program is intended to address Enviva's concern and fulfills the requirements of the Order. Specifically, Enviva agreed to generate VOC emissions data for the following sources.

- Dryer 1 multiclone stack
- Dryer 2 cyclone stack
- Secondary Hammermill 2 cyclone outlet
- Pellet Mill 2 Aspiration System

Since signing the Order, Enviva has determined that it would be beneficial to expand the scope of the emission testing program to include these three additional sources.

- Green Hammermill
- Pellet Cooler 1
- Pellet Cooler 2

The tests at Secondary Hammermill 2 cyclone outlet also represent emissions from Secondary Hammermill 1. Secondary Hammermill 2 is identical to Secondary Hammermill 1 except for the larger capacity of Secondary Hammermill 2.

## 2.3 Test Participants

The Enviva project manager for this project was Mr. Michael Doniger, Director of Plant Operations. He was assisted by Mr. Joe Harrell, Environmental Manager, Mr. Mike Jones, and Mr. Gary Williams, Wiggins Plant Manager.

Mr. Mike J. Doniger, Director, Plant Operations  
Enviva, LP  
7200 Wisconsin Avenue, Suite 1000  
Bethesda, Maryland 20814  
Phone: (301) 657 5560 Extension 163  
Email: Michael.Doniger@envivabiomass.com

Mr. Joe Harrell, Environmental Manager  
Enviva, LP  
142 NC Route 561 East  
Ahoskie, NC 27910 USA  
Phone (252) 209-6032, Extension 202  
Email: Joe.Harrell@envivabiomass.com

Mr. Gary Williams, Plant Manager  
Enviva Pellets Wiggins, LLC  
Wiggins, MS  
Email: Gary.Williams@envivabiomass.com

Legal counsel for Enviva is Mr. Alan McConnell. Mr. McConnell participated in this study to ensure that it addressed the requirements of the Order.

Alan McConnell  
Kilpatrick Townsend & Stockton, LLP  
Suite 1400, 4208 Six Forks Road  
Raleigh, North Carolina 27609  
Phone (919) 420-1798  
Email: amcconnell@kilpatricktownsend.com

Enviva retained Air Control Techniques, P.C. to conduct the air emission testing program at the Wiggins plant. The Air Control Techniques, P.C. project manager was John Richards, Ph.D., P.E., QSTI. He was assisted by David Goshaw, P.E., QSTI, Todd Brozell, P.E., QSTI, and Jonas Gilbert. Tom Holder, QSTI provided quality assurance services for the test program. Contact information for Air Control Techniques, P.C. includes the following.

Air Control Techniques, P.C.  
301 East Durham Road  
Durham, N.C. 27513  
Phone: (919) 460-7811  
John Richards (john.richards@aircontroltechniques.com)  
David Goshaw (dave.goshaw@aircontroltechniques.com)  
Todd Brozell (todd.brozell@aircontroltechniques.com)  
Jonas Gilbert (jonas.gilbert@aircontroltechniques.com)  
Tom Holder (tom.holder@aircontroltechniques.com)

Enthalpy, Inc. provided the laboratory analyses of the samples. The Enthalpy project manager for this project was Mr. Bryan Tyler. He was assisted by Dr. Grant Plummer, Mr. Clint Thrasher, and Mr. Steve Eckert, President.

Enthalpy Analytical, Inc.  
800 Capitola Drive  
Durham, North Carolina 27713  
Phone: (919) 850-4392, Extension 250  
Email: Bryan.tyler@enthalpyanalytical.com



### 3. TEST MATRIX AND TEST RESULTS

#### 3.1 Test Matrix

Table 3-1 summarizes the test program analytes, sampling methods, and analytical methods used for the seven sources listed in Section 1.1

| Table 3-1. Test Matrix, Air Emission Testing<br>Enviva Pellets, Wiggins, Mississippi |                |                   |               |                   |
|--------------------------------------------------------------------------------------|----------------|-------------------|---------------|-------------------|
| Analyte                                                                              | Test Method    | Number of<br>Runs | Run<br>Length | Analytical Method |
| Acetaldehyde, Acrolein,<br>Formaldehyde, Methanol,<br>Phenol, Propionaldehyde        | EPA Method 320 | 3                 | 60 min        | FTIR              |
| Gas Flow                                                                             | EPA Method 2   | 3                 | 60 min        | Manometer         |
| Gas Molecular Weight,<br>Oxygen, Carbon Dioxide                                      | EPA Method 3   | 3                 | 60 min        | Fyrite® Analyzer  |
| Gas Moisture                                                                         | EPA Method 4   | 3                 | 60 min        | Gravimetric       |
| Total Hydrocarbons (THC)                                                             | EPA Method 25A | 3                 | 60 min        | FID               |

The tests were conducted on Thursday, October 10 through Sunday October 13, 2013. During all of the tests, the plant operated with a 60% softwood/40% hardwood feed.

#### 3.2 Test Results

The VOC and organic HAP test results and calculated annual emission rates are summarized in Tables 3-2 through 3-8. VOC and HAP emissions were measured simultaneously at each of the seven emission units tested.

The VOC emissions have been calculated based on the total hydrocarbon data provided by Method 25A. The Method 25A data have been converted from a wet to a dry basis to account for the moisture in the stack gas stream. Total hydrocarbon concentrations (THC) has been used as a surrogate for VOCs.

The VOC emission calculations do not include any corrections for methane, ethane, or acetone despite the fact that these compounds are detected by Method 25A but are not classified as VOCs. Accordingly, the reported VOC emissions are biased to higher-than-true levels to the extent that these three compounds affected the Method 25A results.

The Method 25A data reflect the combined THC concentrations consisting of (1) alpha and beta pinene, (2) numerous other terpenes such as limonene and 3-carene, and (3) the organic HAPs. The organic HAP emissions discussed later in this report are also classified as VOCs and represent a small fraction of the total VOC emissions reported.

Method 320 was used to measure six organic compounds. Several of the organic compounds were below the detection limits of Method 320 in this matrix of gaseous constituents. These non-detection concentrations are designated by shading in Tables 3-2 through 3-8.

| Table 3-2. Green Hammermill <sup>1</sup> Emission Test Results |            |            |            |          |
|----------------------------------------------------------------|------------|------------|------------|----------|
| Parameter                                                      | Run 1      | Run 2      | Run 3      | Average  |
| Date                                                           | 10/10/2013 | 10/10/2013 | 10/10/2013 | N/A      |
| Start                                                          | 9:17       | 10:36      | 11:50      | N/A      |
| Stop                                                           | 10:17      | 11:36      | 12:50      | N/A      |
| Throughput, tons/hour                                          | 36         | 36         | 36         | 36.0     |
| Moisture Content Outlet, %wt.                                  | 47.15      | 47.15      | 47.15      | 47.2     |
| Throughput, ODT/hour                                           | 19.026     | 19.026     | 19.026     | 19.0     |
| ACFM                                                           | 27,642     | 27,273     | 27,189     | 27,368.0 |
| DSCFM                                                          | 25,184     | 24,803     | 25,031     | 25,006   |
| Stack Temperature, °F                                          | 70.8       | 70.6       | 70.9       | 70.8     |
| O <sub>2</sub> , %                                             | 20.9       | 20.9       | 20.9       | 20.9     |
| % Moisture                                                     | 3.41       | 3.62       | 2.37       | 3.1      |
| VOC, ppmvd as Propane                                          | 31.9       | 33.4       | 27         | 30.8     |
| VOC, ppmvd as C1                                               | 95.7       | 100.3      | 81.1       | 92.4     |
| VOC, lbs/hour as C1                                            | 4.5        | 4.7        | 3.8        | 4.3      |
| VOC, lbs/ODT                                                   | 0.24       | 0.25       | 0.20       | 0.2      |
| Methanol, ppmvd                                                | 0.53       | 0.48       | 0.39       | 0.46     |
| Acetaldehyde, ppmvd                                            | 0.79       | 0.75       | 0.74       | 0.76     |
| Acrolein, ppmvd                                                | 1.17       | 1.25       | 1.18       | 1.20     |
| Formaldehyde, ppmvd                                            | 0.77       | 0.65       | 0.57       | 0.66     |
| Phenol, ppmvd                                                  | 0.91       | 0.91       | 0.90       | 0.91     |
| Propionaldehyde, ppmvd                                         | 0.24       | 0.24       | 0.26       | 0.247    |
| Methanol, lbs/hour                                             | 0.066      | 0.060      | 0.049      | 0.058    |
| Acetaldehyde, lbs/hour                                         | 0.136      | 0.129      | 0.127      | 0.131    |
| Acrolein, lbs/hour                                             | 0.257      | 0.274      | 0.259      | 0.263    |
| Formaldehyde, lbs/hour                                         | 0.090      | 0.077      | 0.068      | 0.078    |
| Phenol, lbs/hour                                               | 0.000      | 0.000      | 0.000      | 0.000    |
| Propionaldehyde, lbs/hour                                      | 0.000      | 0.000      | 0.058      | 0.019    |
| Methanol, lbs/ODT                                              | 0.003      | 0.003      | 0.002      | 0.003    |
| Acetaldehyde, lbs/ODT                                          | 0.007      | 0.007      | 0.006      | 0.007    |
| Acrolein, lbs/ODT                                              | 0.013      | 0.014      | 0.013      | 0.013    |
| Formaldehyde, lbs/ODT                                          | 0.005      | 0.004      | 0.003      | 0.004    |
| Phenol, lbs/ODT                                                | 0.000      | 0.000      | 0.000      | 0.000    |
| Propionaldehyde, lbs/ODT                                       | 0.000      | 0.000      | 0.003      | 0.001    |

1. Note: Shaded area indicates a calculated minimum detection limit. Emissions were calculated based on zero for non-detect values.

| Table 3-3. Dryer 1 Emissions <sup>1</sup> Emission Test Results |            |            |            |         |
|-----------------------------------------------------------------|------------|------------|------------|---------|
| Parameter                                                       | Run 1      | Run 2      | Run 3      | Average |
| Date                                                            | 10/10/2013 | 10/11/2013 | 10/11/2013 | N/A     |
| Start                                                           | 17:38      | 10:00      | 11:37      | N/A     |
| Stop                                                            | 18:38      | 11:00      | 12:37      | N/A     |
| Throughput, tons/hour                                           | 8.5        | 8.45       | 9          | 8.7     |
| Moisture Content Outlet, %wt.                                   | 15.5       | 14.36      | 18.9       | 16.3    |
| Throughput, ODT/hour                                            | 7.18       | 7.24       | 7.30       | 7.2     |
| ACFM                                                            | 44,448     | 42,243     | 42,593     | 43,095  |
| DSCFM                                                           | 32,404     | 31,700     | 31,215     | 31,773  |
| Stack Temperature, °F                                           | 146.3      | 150.1      | 147.3      | 147.9   |
| O <sub>2</sub> , %                                              | 19.0       | 17.0       | 17.0       | 17.7    |
| % Moisture                                                      | 16.07      | 12.79      | 15.23      | 14.7    |
| VOC, ppmvd as Propane                                           | 79.5       | 71         | 67.4       | 72.6    |
| VOC, ppmvd as C1                                                | 238.8      | 213.3      | 202.6      | 218.2   |
| VOC, lbs/hour as C1                                             | 14.4       | 12.6       | 11.8       | 12.93   |
| VOC, lbs/ODT                                                    | 2.00       | 1.74       | 1.62       | 1.79    |
| Methanol, ppmvd                                                 | 3.00       | 1.95       | 1.88       | 2.28    |
| Acetaldehyde, ppmvd                                             | 1.51       | 1.46       | 1.50       | 1.49    |
| Acrolein, ppmvd                                                 | 2.13       | 1.97       | 2.03       | 2.04    |
| Formaldehyde, ppmvd                                             | 3.96       | 1.83       | 2.10       | 2.63    |
| Phenol, ppmvd                                                   | 2.43       | 2.34       | 2.41       | 2.39    |
| Propionaldehyde, ppmvd                                          | 0.76       | 0.81       | 0.59       | 0.72    |
| Methanol, lbs/hour                                              | 0.483      | 0.308      | 0.292      | 0.36    |
| Acetaldehyde, lbs/hour                                          | 0.0        | 0.0        | 0.0        | 0.000   |
| Acrolein, lbs/hour                                              | 0.598      | 0.0        | 0.0        | 0.199   |
| Formaldehyde, lbs/hour                                          | 0.597      | 0.272      | 0.307      | 0.392   |
| Phenol, lbs/hour                                                | 0.0        | 0.0        | 0.0        | 0.000   |
| Propionaldehyde, lbs/hour                                       | 0.222      | 0.233      | 0.167      | 0.207   |
| Methanol, lbs/ODT                                               | 0.067      | 0.043      | 0.040      | 0.050   |
| Acetaldehyde, lbs/ODT                                           | 0.0        | 0.0        | 0.0        | 0.000   |
| Acrolein, lbs/ODT                                               | 0.083      | 0.0        | 0.0        | 0.028   |
| Formaldehyde, lbs/ODT                                           | 0.083      | 0.038      | 0.042      | 0.054   |
| Phenol, lbs/ODT                                                 | 0.0        | 0.0        | 0.0        | 0.000   |
| Propionaldehyde, lbs/ODT                                        | 0.031      | 0.032      | 0.023      | 0.029   |

1. Note: Shaded area indicates a calculated minimum detection limit. Emissions were calculated based on zero for non-detect values.

| Table 3-4. Pellet Cooler 1 <sup>1</sup> Emission Test Results |            |            |            |          |
|---------------------------------------------------------------|------------|------------|------------|----------|
| Parameter                                                     | Run 1      | Run 2      | Run 3      | Average  |
| Date                                                          | 10/12/2013 | 10/12/2013 | 10/12/2013 | N/A      |
| Start                                                         | 8:58       | 10:22      | 11:41      | N/A      |
| Stop                                                          | 9:58       | 11:22      | 12:41      | N/A      |
| Throughput, tons/hour                                         | 4          | 4          | 4          | 4.0      |
| Moisture Content Outlet, %wt.                                 | 7.9        | 7.9        | 7.9        | 7.9      |
| Throughput, ODT/hour                                          | 3.68       | 3.68       | 3.68       | 3.68     |
| ACFM                                                          | 16,168     | 16,246     | 16,134     | 16,182.7 |
| DSCFM                                                         | 15,189     | 14,870     | 14,825     | 14,961   |
| Stack Temperature, °F                                         | 82.3       | 94.8       | 97.7       | 91.6     |
| O <sub>2</sub> , %                                            | 20.9       | 20.9       | 20.9       | 20.9     |
| % Moisture                                                    | 3.35       | 3.68       | 2.79       | 3.27     |
| VOC, ppmvd as Propane                                         | 40.4       | 34.6       | 36.7       | 37.2     |
| VOC, ppmvd as C1                                              | 121.2      | 103.8      | 110.1      | 111.7    |
| VOC, lbs/hour as C1                                           | 3.44       | 2.88       | 3.05       | 3.12     |
| VOC, lbs/ODT                                                  | 0.93       | 0.78       | 0.83       | 0.85     |
| Methanol, ppmvd                                               | 0.56       | 0.34       | 0.36       | 0.42     |
| Acetaldehyde, ppmvd                                           | 0.71       | 0.73       | 0.78       | 0.74     |
| Acrolein, ppmvd                                               | 1.01       | 1.06       | 1.39       | 1.15     |
| Formaldehyde, ppmvd                                           | 1.49       | 1.30       | 1.30       | 1.36     |
| Phenol, ppmvd                                                 | 1.03       | 1.02       | 1.01       | 1.02     |
| Propionaldehyde, ppmvd                                        | 0.39       | 0.30       | 0.25       | 0.31     |
| Methanol, lbs/hour                                            | 0.042      | 0.026      | 0.027      | 0.032    |
| Acetaldehyde, lbs/hour                                        | 0.074      | 0.076      | 0.081      | 0.077    |
| Acrolein, lbs/hour                                            | 0.135      | 0.141      | 0.184      | 0.153    |
| Formaldehyde, lbs/hour                                        | 0.105      | 0.092      | 0.092      | 0.096    |
| Phenol, lbs/hour                                              | 0.2        | 0.0        | 0.0        | 0.077    |
| Propionaldehyde, lbs/hour                                     | 0.054      | 0.041      | 0.000      | 0.032    |
| Methanol, lbs/ODT                                             | 0.011      | 0.007      | 0.007      | 0.009    |
| Acetaldehyde, lbs/ODT                                         | 0.020      | 0.021      | 0.022      | 0.021    |
| Acrolein, lbs/ODT                                             | 0.037      | 0.038      | 0.050      | 0.042    |
| Formaldehyde, lbs/ODT                                         | 0.029      | 0.025      | 0.025      | 0.026    |
| Phenol, lbs/ODT                                               | 0.063      | 0.000      | 0.0        | 0.021    |
| Propionaldehyde, lbs/ODT                                      | 0.015      | 0.011      | 0.000      | 0.009    |

1. Note: Shaded area indicates a calculated minimum detection limit. Emissions were calculated based on zero for non-detect values.

| Table 3-5. Dryer 2 <sup>1</sup> Emission Test Results |            |            |            |          |
|-------------------------------------------------------|------------|------------|------------|----------|
| Parameter                                             | Run 1      | Run 2      | Run 3      | N/A      |
| Date                                                  | 10/13/2013 | 10/13/2013 | 10/13/2013 | N/A      |
| Start                                                 | 9:21       | 11:14      | 12:31      | N/A      |
| Stop                                                  | 10:21      | 12:52      | 13:47      | N/A      |
| Throughput, tons/hour                                 | 14.5       | 11.2       | 11.3       | 12.3     |
| Moisture Content Outlet, %wt.                         | 18.5       | 13.45      | 13.75      | 15.2     |
| Throughput, ODT/hour                                  | 11.82      | 9.69       | 9.75       | 10.4     |
| ACFM                                                  | 24,998     | 25,318     | 25,278     | 25,198.0 |
| DSCFM                                                 | 14,745     | 15,224     | 14,842     | 14,937   |
| Stack Temperature, °F                                 | 174.3      | 154.9      | 171.8      | 167.0    |
| O <sub>2</sub> , %                                    | 16.5       | 17         | 17         | 16.8     |
| % Moisture                                            | 29.04      | 29.86      | 29.64      | 29.5     |
| VOC, ppmvd as Propane                                 | 129.4      | 115.8      | 138.1      | 127.8    |
| VOC, ppmvd as C1                                      | 388.2      | 347.4      | 414.3      | 383.3    |
| VOC, lbs/hour as C1                                   | 10.70      | 9.88       | 11.49      | 10.69    |
| VOC, lbs/ODT                                          | 0.91       | 1.02       | 1.18       | 1.03     |
| Methanol, ppmvd                                       | 26.5       | 14.5       | 15.3       | 18.795   |
| Acetaldehyde, ppmvd                                   | 1.4        | 4.7        | 1.4        | 2.498    |
| Acrolein, ppmvd                                       | 2.7        | 3.7        | 3.5        | 3.303    |
| Formaldehyde, ppmvd                                   | 9.0        | 9.4        | 9.6        | 9.336    |
| Phenol, ppmvd                                         | 3.9        | 4.0        | 4.0        | 3.944    |
| Propionaldehyde, ppmvd                                | 3.3        | 2.0        | 2.4        | 2.575    |
| Methanol, lbs/hour                                    | 1.949      | 1.070      | 1.129      | 1.383    |
| Acetaldehyde, lbs/hour                                | 0.138      | 0.473      | 0.147      | 0.253    |
| Acrolein, lbs/hour                                    | 0.345      | 0.476      | 0.456      | 0.425    |
| Formaldehyde, lbs/hour                                | 0.622      | 0.647      | 0.662      | 0.644    |
| Phenol, lbs/hour                                      | 0.0        | 0.0        | 0.0        | 0.000    |
| Propionaldehyde, lbs/hour                             | 0.445      | 0.262      | 0.322      | 0.343    |
| Methanol, lbs/ODT                                     | 0.165      | 0.110      | 0.116      | 0.130    |
| Acetaldehyde, lbs/ODT                                 | 0.012      | 0.049      | 0.015      | 0.025    |
| Acrolein, lbs/ODT                                     | 0.029      | 0.049      | 0.047      | 0.042    |
| Formaldehyde, lbs/ODT                                 | 0.053      | 0.067      | 0.068      | 0.062    |
| Phenol, lbs/ODT                                       | 0.0        | 0.0        | 0.0        | 0.000    |
| Propionaldehyde, lbs/ODT                              | 0.038      | 0.027      | 0.033      | 0.033    |

1. Note: Shaded area indicates a calculated minimum detection limit. Emissions were calculated based on zero for non-detect values.

| Table 3-6. Dry Hammermill 2 <sup>1</sup> Emission Test Results |            |            |            |         |
|----------------------------------------------------------------|------------|------------|------------|---------|
| Parameter                                                      | Run 1      | Run 2      | Run 3      | Average |
| Date                                                           | 10/11/2013 | 10/11/2013 | 10/11/2013 | N/A     |
| Start                                                          | 18:11      | 19:35      | 20:48      | N/A     |
| Stop                                                           | 19:11      | 20:35      | 21:48      | N/A     |
| Throughput, tons/hour                                          | 11.18      | 11.22      | 11.12      | 11.2    |
| Moisture Content Outlet, %wt.                                  | 10.2       | 10.3       | 10.2       | 10.2    |
| Throughput, ODT/hour                                           | 10.04      | 10.06      | 9.99       | 10.0    |
| ACFM                                                           | 15,197     | 14,385     | 15,165     | 14,916  |
| DSCFM                                                          | 13,183     | 12,366     | 13,303     | 12,951  |
| Stack Temperature, °F                                          | 122.4      | 128.4      | 116.4      | 122.4   |
| O <sub>2</sub> , %                                             | 20.9       | 20.9       | 20.9       | 20.9    |
| % Moisture                                                     | 4.25       | 4.18       | 4.18       | 4.20    |
| VOC, ppmvd as Propane                                          | 26.3       | 31.0       | 25.5       | 27.6    |
| VOC, ppmvd as C1                                               | 78.9       | 93         | 76.5       | 82.8    |
| VOC, lbs/hour as C1                                            | 1.94       | 2.15       | 1.90       | 2.00    |
| VOC, lbs/ODT                                                   | 0.19       | 0.21       | 0.19       | 0.20    |
| Methanol, ppmvd                                                | 0.20       | 0.22       | 0.21       | 0.21    |
| Acetaldehyde, ppmvd                                            | 0.75       | 0.74       | 0.74       | 0.74    |
| Acrolein, ppmvd                                                | 1.02       | 1.02       | 1.01       | 1.02    |
| Formaldehyde, ppmvd                                            | 1.09       | 1.19       | 1.16       | 1.14    |
| Phenol, ppmvd                                                  | 1.13       | 1.13       | 1.13       | 1.13    |
| Propionaldehyde, ppmvd                                         | 0.24       | 0.25       | 0.27       | 0.254   |
| Methanol, lbs/hour                                             | 0.013      | 0.014      | 0.014      | 0.014   |
| Acetaldehyde, lbs/hour                                         | 0.067      | 0.067      | 0.000      | 0.045   |
| Acrolein, lbs/hour                                             | 0.118      | 0.118      | 0.000      | 0.078   |
| Formaldehyde, lbs/hour                                         | 0.067      | 0.073      | 0.071      | 0.071   |
| Phenol, lbs/hour                                               | 0.000      | 0.000      | 0.000      | 0.000   |
| Propionaldehyde, lbs/hour                                      | 0.029      | 0.030      | 0.032      | 0.030   |
| Methanol, lbs/ODT                                              | 0.001      | 0.001      | 0.001      | 0.0014  |
| Acetaldehyde, lbs/ODT                                          | 0.007      | 0.007      | 0.000      | 0.0045  |
| Acrolein, lbs/ODT                                              | 0.012      | 0.012      | 0.000      | 0.0078  |
| Formaldehyde, lbs/ODT                                          | 0.007      | 0.007      | 0.007      | 0.0070  |
| Phenol, lbs/ODT                                                | 0.000      | 0.000      | 0.000      | 0.0000  |
| Propionaldehyde, lbs/ODT                                       | 0.003      | 0.003      | 0.003      | 0.0030  |

1. Note: Shaded area indicates a calculated minimum detection limit. Emissions were calculated based on zero for non-detect values.

| Table 3-7. Pellet Cooler 2 <sup>1</sup> Emission Test Results |            |            |            |         |
|---------------------------------------------------------------|------------|------------|------------|---------|
| Parameter                                                     | Run 1      | Run 2      | Run 3      | Average |
| Date                                                          | 10/11/2013 | 10/11/2013 | 10/11/2013 | N/A     |
| Start                                                         | 13:43      | 15:08      | 16:39      | N/A     |
| Stop                                                          | 14:43      | 16:08      | 17:39      | N/A     |
| Throughput, tons/hour                                         | 15.0       | 15.0       | 15.0       | 15.0    |
| Moisture Content Outlet, %wt.                                 | 7.12       | 7.36       | 7.17       | 7.2     |
| Throughput, ODT/hour                                          | 13.93      | 13.90      | 13.92      | 13.9    |
| ACFM                                                          | 13,252     | 12,718     | 12,831     | 12,934  |
| DSCFM                                                         | 10,938     | 10,543     | 10,488     | 10,656  |
| Stack Temperature, °F                                         | 148.9      | 143.2      | 152.3      | 148.1   |
| O <sub>2</sub> , %                                            | 20.9       | 20.9       | 20.9       | 20.9    |
| % Moisture                                                    | 4.86       | 4.64       | 4.54       | 4.68    |
| VOC, ppmvd as Propane                                         | 25.0       | 22.3       | 26.0       | 24.4    |
| VOC, ppmvd as C1                                              | 75         | 66.9       | 78         | 73.3    |
| VOC, lbs/hour as C1                                           | 1.53       | 1.32       | 1.53       | 1.46    |
| VOC, lbs/ODT                                                  | 0.11       | 0.09       | 0.11       | 0.10    |
| Methanol, ppmvd                                               | 0.84       | 0.71       | 0.88       | 0.81    |
| Acetaldehyde, ppmvd                                           | 0.90       | 0.87       | 0.83       | 0.87    |
| Acrolein, ppmvd                                               | 1.36       | 1.27       | 1.39       | 1.34    |
| Formaldehyde, ppmvd                                           | 1.12       | 0.69       | 1.93       | 1.25    |
| Phenol, ppmvd                                                 | 1.14       | 1.13       | 1.13       | 1.13    |
| Propionaldehyde, ppmvd                                        | 0.26       | 0.26       | 0.38       | 0.30    |
| Methanol, lbs/hour                                            | 0.046      | 0.039      | 0.048      | 0.044   |
| Acetaldehyde, lbs/hour                                        | 0.068      | 0.065      | 0.062      | 0.065   |
| Acrolein, lbs/hour                                            | 0.130      | 0.121      | 0.133      | 0.128   |
| Formaldehyde, lbs/hour                                        | 0.058      | 0.035      | 0.099      | 0.064   |
| Phenol, lbs/hour                                              | 0          | 0          | 0          | 0.000   |
| Propionaldehyde, lbs/hour                                     | 0.026      | 0.000      | 0.037      | 0.021   |
| Methanol, lbs/ODT                                             | 0.003      | 0.003      | 0.003      | 0.003   |
| Acetaldehyde, lbs/ODT                                         | 0.005      | 0.005      | 0.004      | 0.005   |
| Acrolein, lbs/ODT                                             | 0.009      | 0.009      | 0.010      | 0.009   |
| Formaldehyde, lbs/ODT                                         | 0.004      | 0.003      | 0.007      | 0.005   |
| Phenol, lbs/ODT                                               | 0.0        | 0.0        | 0.0        | 0.000   |
| Propionaldehyde, lbs/ODT                                      | 0.002      | 0.000      | 0.003      | 0.002   |

1. Note: Shaded area indicates a calculated minimum detection limit. Emissions were calculated based on zero for non-detect values.

| Table 3-8. Aspiration System <sup>1</sup> Emission Test Results |            |            |            |         |
|-----------------------------------------------------------------|------------|------------|------------|---------|
| Parameter                                                       | Run 1      | Run 2      | Run 3      | Average |
| Date                                                            | 10/12/2013 | 10/12/2013 | 10/12/2013 | N/A     |
| Start                                                           | 15:09      | 16:36      | 18:00      | N/A     |
| Stop                                                            | 16:09      | 17:36      | 19:00      | N/A     |
| Throughput, tons/hour                                           | 15         | 15         | 15         | 15.0    |
| Moisture Content Outlet, %wt.                                   | 7.12       | 8.83       | 7.85       | 7.93    |
| Throughput, ODT/hour                                            | 13.93      | 13.68      | 13.82      | 13.8    |
| ACFM                                                            | 1,756      | 1,692      | 1,624      | 1,691   |
| DSCFM                                                           | 1,079      | 1,016      | 985        | 1,027   |
| Stack Temperature, °F                                           | 148.6      | 148.3      | 152.1      | 149.7   |
| O <sub>2</sub> , %                                              | 20.9       | 20.9       | 20.9       | 20.9    |
| % Moisture                                                      | 27.67      | 29.33      | 28.19      | 28.4    |
| VOC, ppmvd as Propane                                           | 1485.8     | 1354.2     | 1671.1     | 1,503.7 |
| VOC, ppmvd as C1                                                | 4457.4     | 4062.6     | 5013.3     | 4,511.1 |
| VOC, lbs/hour as C1                                             | 8.99       | 7.71       | 9.23       | 8.64    |
| VOC, lbs/ODT                                                    | 0.65       | 0.56       | 0.67       | 0.63    |
| Methanol, ppmvd                                                 | 11.5       | 12.6       | 11.4       | 11.81   |
| Acetaldehyde, ppmvd                                             | 6.4        | 5.5        | 5.2        | 5.73    |
| Acrolein, ppmvd                                                 | 4.4        | 4.4        | 3.1        | 3.97    |
| Formaldehyde, ppmvd                                             | 1.5        | 2.2        | 1.5        | 1.72    |
| Phenol, ppmvd                                                   | 3.8        | 3.9        | 3.8        | 3.81    |
| Propionaldehyde, ppmvd                                          | 4.1        | 4.2        | 4.2        | 4.19    |
| Methanol, lbs/hour                                              | 0.062      | 0.068      | 0.061      | 0.064   |
| Acetaldehyde, lbs/hour                                          | 0.048      | 0.041      | 0.039      | 0.042   |
| Acrolein, lbs/hour                                              | 0.041      | 0.042      | 0.030      | 0.037   |
| Formaldehyde, lbs/hour                                          | 0.000      | 0.011      | 0.007      | 0.006   |
| Phenol, lbs/hour                                                | 0.000      | 0.000      | 0.000      | 0.000   |
| Propionaldehyde, lbs/hour                                       | 0.000      | 0.000      | 0.000      | 0.000   |
| Methanol, lbs/ODT                                               | 0.004      | 0.005      | 0.004      | 0.005   |
| Acetaldehyde, lbs/ODT                                           | 0.003      | 0.003      | 0.003      | 0.003   |
| Acrolein, lbs/ODT                                               | 0.003      | 0.003      | 0.002      | 0.003   |
| Formaldehyde, lbs/ODT                                           | 0.000      | 0.001      | 0.001      | 0.000   |
| Phenol, lbs/ODT                                                 | 0.000      | 0.000      | 0.000      | 0.000   |
| Propionaldehyde, lbs/ODT                                        | 0.000      | 0.000      | 0.000      | 0.000   |

1. Note: Shaded area indicates a calculated minimum detection limit. Emissions were calculated based on zero for non-detect values.



### 3.3 Emissions Data Evaluation

#### Method 25A VOC Concentrations

The VOC emissions from the various process units ranged from 0.10 to 1.79 pounds per ODT. VOC emissions were highest from the two dryers.

Dryer 1 had an emission rate of 1.79 pounds per ODT, and Dryer 2 had an emission rate of 1.03 pounds per ODT. This is equivalent to a 79% difference despite the fact that the dryers were handling similar hardwood/softwood blends and were generating wood with similar outlet moisture levels. The dryer outlet temperatures were also similar. These data clearly demonstrate that VOC emissions from the dryers are due to two factors: (1) the performance of the wood waste burner supplying the heat to the dryer, and (2) volatilization of VOCs from the wood in the dryer. Of these two sources, contributions of the burner are most important.

Due to the dominance of the burner in establishing the VOC emission rates from the combined burner/dryer source, the importance of the hardwood/softwood ratio is less important than previously thought. Changes in the hardwood/softwood ratio do not necessarily affect the VOC emissions from the burner.

The emissions of organic HAP compounds are not sensitive to the hardwood/softwood ratio. The data summarized in the Phase I report indicate that emissions of organic HAPs decreased slightly as the softwood content increased from 10% to 100%.

The data summarized in Tables 3-2 through 3-8 indicate that the total VOC emissions from the Wiggins Plant exceed 100 tons per year calculated as carbon. These tests confirm that the plant is a major source for VOCs.

The accuracy of the VOC data is demonstrated by a Method 25A response factor of approximately 1 for the group of compounds present in the gas stream. The Method 25A response is expressed in terms of a response factor that is defined as the observed Method 25A concentration divided by the true concentration. The Method 25A FID has a response factor close to 1.0 for a large set of organic compounds. Some high molecular weight organics have a response factor larger than 1, and in some cases, approaching 1.5. For these compounds, Method 25A is biased to higher-than-true concentrations. Some low molecular weight highly oxygenated organic compounds such as methanol and formaldehyde have very low response factors in the range of 0.1 to 0.4. For these compounds, Method 25A is biased to lower-than-true concentrations.

As part of the laboratory tests reported to MDEQ in Enviva's Phase I emission study dated July 31, 2013<sup>[4]</sup> (the "Phase I Study"). Air Control Techniques, P.C. has taken the following two independent approaches in assessing the Method 25A response factors: (1) direct measurement of the Method 25A response factor using an alpha-pinene gas standard, the dominant organic compound measured during the laboratory tests and (2) a comparison of the Method 25A concentration data with the summed concentrations of all of the specific organics measured simultaneously using NCASI Method 98.01 and EPA Method 18. The results of these response factor analyses are presented in Tables 3-9 and 3-10.

| Table 3-9. Alpha-Pinene Method 25A Response Factor <sup>1</sup> |         |
|-----------------------------------------------------------------|---------|
| Alpha-Pinene Gas Standard, as C <sub>10</sub> H <sub>16</sub>   | 259 ppm |
| Alpha-Pinene Gas Standard, as C <sub>3</sub>                    | 863 ppm |
| FID Response, as C <sub>3</sub>                                 | 888 ppm |
| Response Factor as C <sub>3</sub>                               | 1.03    |

1. Note: This table was included in the Phase I Study report to MDEQ.

| Table 3-10. Calculated Method 25A Response Factors in Phase I Laboratory Tests <sup>1</sup> |              |                     |                                                      |                               |                           |
|---------------------------------------------------------------------------------------------|--------------|---------------------|------------------------------------------------------|-------------------------------|---------------------------|
| Run                                                                                         | Process Type | Softwood Content, % | Method 25A versus Combined NCASI 98.01 and Method 18 | Dominant Compounds            | Other Important Compounds |
| 4                                                                                           | Dryer        | 10                  | 0.72                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone, Methanol         |
| 5                                                                                           | Dryer        | 10                  | 0.70                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone, Methanol         |
| 6                                                                                           | Dryer        | 10                  | 0.75                                                 | $\alpha$ -and $\beta$ -Pinene | Methanol, Formaldehyde    |
| 21                                                                                          | Dryer        | 10                  | 1.23                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone, Methanol         |
| 22                                                                                          | Press        | 10                  | 1.05                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone, Methanol         |
| 7                                                                                           | Dryer        | 70                  | 0.85                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone                   |
| 8                                                                                           | Dryer        | 70                  | 0.90                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone                   |
| 9                                                                                           | Dryer        | 70                  | 1.02                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone                   |
| 10                                                                                          | Dryer        | 70                  | 0.91                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone                   |
| 24                                                                                          | Press        | 70                  | 1.51                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone, Methanol         |
| 11                                                                                          | Dryer        | 100                 | 0.99                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone                   |
| 12                                                                                          | Dryer        | 100                 | 0.96                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone                   |
| 13                                                                                          | Dryer        | 100                 | 0.85                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone                   |
| 14                                                                                          | Dryer        | 100                 | 0.87                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone                   |
| 16                                                                                          | Dryer        | 100                 | 1.09                                                 | $\alpha$ -and $\beta$ -Pinene | Methanol, Acetone         |
| 19                                                                                          | Dryer        | 100                 | 1.21                                                 | $\alpha$ -and $\beta$ -Pinene | Methanol, Acetone         |
| 20                                                                                          | Press        | 100                 | 1.13                                                 | $\alpha$ -and $\beta$ -Pinene | Methanol, Acetone         |
| Test Program Average                                                                        |              |                     | 0.98                                                 |                               |                           |

1. Note: This table was included in the Phase I Study report to MDEQ.

The excellent agreement between the Method 25A total concentration and the combined concentrations of all of the organics measured by NCASI 98.01 and EPA Method 18 demonstrate that Method 25A is an appropriate VOC measurement technique for wood pellet production facilities.

### Method 320 HAP Concentrations

At the maximum permitted production limit of 185,550 ODT per year, five of the six organic HAP compounds measured by Method 320 were each emitted at a rate less than 10 tons per year. The methanol emission rate at this production level was 11.0 tons per year. The combined emission rate of all six organic HAPs was slightly over 31.1 tons per year at the maximum permitted production rate.

The list of HAPs specifically included in the test protocol included methanol, acetaldehyde, acrolein, formaldehyde, phenol, and propionaldehyde. This list was compiled based on (1) the organic compounds identified in laboratory analyses of pellet production facilities emissions, (2) previous emission tests conducted in the Pellet Manufacturing Industry, and (3) organic HAPs identified in studies of other wood products industries—specifically, MDF production.

The results of this test program indicate that this list of HAPs compounds needs to be amended. Phenol was detected at low concentration in only one of the tests of the seven process units. Furthermore, propionaldehyde was not detected in most of the tests.

The low to non-detectable phenol emissions data are consistent with the results of the Phase I Study. Phenol was not identified at detectable concentrations in any of the laboratory studies summarized in the Phase I Study report. The emission rates of phenol reported in the November 2012 Wiggins report <sup>[2]</sup> ranged from 0.0002 to 0.0018 pounds per hour—all insignificant emission rates. Phenol was also not listed in previous emission tests reviewed in preparation for this test program. Phenol was included in the test protocol primarily because other researchers such as Beauchemin and Tampier, <sup>[5]</sup> Milot, <sup>[6]</sup> and Milot and Mosher <sup>[7]</sup> listed phenol due to its inclusion in tests conducted at MDF and particleboard facilities. However, phenol emissions in MDF and particleboard production are due to the use of phenolic resins and similar binders. There is no reason to expect any appreciable phenol formation in pellet production considering (1) the lack of binders of any type in pellet production, (2) the higher moisture levels in pellet production as compared to MDF and particleboard processes, and (3) the lower material temperatures in pellet process equipment. Air Control Techniques, P.C. has assigned zero values to non-detected concentrations.

Acetaldehyde, propionaldehyde, and acrolein had very low concentrations in most of the emission tests summarized in this report. The IR absorption spectra of both water and the terpene compounds overlap the absorption spectra of acetaldehyde, propionaldehyde, and acrolein. Accordingly, the reported concentrations of these three compounds are biased to higher-than-true levels to the extent that this interference could not be avoided by Method 320 spectral absorption modeling. Zero values have been assigned when these concentrations were below detection limits of Method 320 due, in part, to the interference bias.

The use of zero values for non-detected compounds is an appropriate approach for any source, such as pellet production, where there are a few dominant compounds (i.e. methanol and formaldehyde) and a large number of possible compounds at extremely low levels such as phenol, acetaldehyde, and propionaldehyde. The use of non-detect or one-half non-detect concentrations in emission calculations for a large number of compounds potentially present at trace levels inherently makes any source “major” regardless of the actual emissions, size, or operations characteristics of the emission unit.

### **3.4 VOC and Organic HAP Emission Summary**

Table 3-11 summaries annual emissions of VOC and organic HAP compounds. The annual emission rates are based on operation at the permit limited production rate of 185,550 ODT.

As discussed, the plant has never operated at the maximum permitted production limit of 185,550 ODT per year. The VOC and HAP emissions based on the newly proposed maximum production rate of 140,000 ODT/year are summarized in Table 3-12.

The VOC emissions at the lower production rate are well below the PSD threshold of 250 tons per year. The combined HAPs emissions are less than 25 tons per year, and none of the HAPs are emitted at more than 10 tons per year. Accordingly, at this production limit, the plant is not above the major source threshold for HAPs.

| Table 3-11. Total Emissions at Plant Permit Limit of 185,550 ODT/Year |         |         |                  |                  |                 |                 |           |                  |       |
|-----------------------------------------------------------------------|---------|---------|------------------|------------------|-----------------|-----------------|-----------|------------------|-------|
| Analyte                                                               | Dryer 1 | Dryer 2 | Dry Hammermill 2 | Green Hammermill | Pellet Cooler 1 | Pellet Cooler 2 | Aspirator | Dry Hammermill 1 | Total |
| Total VOC                                                             | 66.3    | 57.6    | 11.1             | 21.1             | 15.7            | 7.8             | 46.4      | 7.4              | 233.5 |
| Organic HAPs                                                          |         |         |                  |                  |                 |                 |           |                  |       |
| Methanol                                                              | 1.85    | 7.26    | 0.08             | 0.27             | 0.16            | 0.24            | 0.34      | 0.05             | 10.3  |
| Acetaldehyde                                                          | 0.00    | 1.40    | 0.25             | 0.61             | 0.39            | 0.35            | 0.23      | 0.17             | 2.0   |
| Acrolein                                                              | 1.03    | 2.32    | 0.43             | 1.24             | 0.77            | 0.68            | 0.20      | 0.29             | 7.0   |
| Formaldehyde                                                          | 2.01    | 3.48    | 0.39             | 0.37             | 0.49            | 0.34            | 0.03      | 0.26             | 7.4   |
| Phenol                                                                | 0.00    | 0.00    | 0.00             | 0.00             | 0.39            | 0.00            | 0.00      | 0.00             | 0.4   |
| Propionaldehyde                                                       | 1.06    | 1.82    | 0.17             | 0.09             | 0.16            | 0.11            | 0.00      | 0.11             | 3.5   |
| Total HAPS                                                            | 5.96    | 14.87   | 1.32             | 2.59             | 2.35            | 1.72            | 0.80      | 0.88             | 31.89 |

| Table 3-12. Total Emissions at Plant Permit Limit of 140,000 ODT/Year |         |         |                  |                  |                 |                 |           |                  |       |
|-----------------------------------------------------------------------|---------|---------|------------------|------------------|-----------------|-----------------|-----------|------------------|-------|
| Analyte                                                               | Dryer 1 | Dryer 2 | Dry Hammermill 2 | Green Hammermill | Pellet Cooler 1 | Pellet Cooler 2 | Aspirator | Dry Hammermill 1 | Total |
| VOC Total                                                             | 50.1    | 43.4    | 8.4              | 15.9             | 11.7            | 5.9             | 35.0      | 5.6              | 175.9 |
| Organic HAPs                                                          |         |         |                  |                  |                 |                 |           |                  |       |
| Methanol                                                              | 1.40    | 5.48    | 0.06             | 0.21             | 0.12            | 0.18            | 0.26      | 0.04             | 7.7   |
| Acetaldehyde                                                          | 0.00    | 1.06    | 0.19             | 0.46             | 0.29            | 0.26            | 0.17      | 0.12             | 2.6   |
| Acrolein                                                              | 0.78    | 1.75    | 0.33             | 0.93             | 0.58            | 0.51            | 0.15      | 0.22             | 5.3   |
| Formaldehyde                                                          | 1.52    | 2.62    | 0.30             | 0.28             | 0.37            | 0.26            | 0.03      | 0.20             | 5.6   |
| Phenol                                                                | 0.00    | 0.00    | 0.00             | 0.00             | 0.29            | 0.00            | 0.00      | 0.00             | 0.3   |
| Propionaldehyde                                                       | 0.80    | 1.37    | 0.13             | 0.07             | 0.12            | 0.08            | 0.00      | 0.08             | 2.7   |
| Total HAPS                                                            | 4.50    | 12.28   | 0.99             | 1.95             | 1.78            | 1.30            | 0.61      | 0.66             | 24.06 |

## 4. SAMPLING LOCATIONS

### 4.1 Dryer # 1 Stack Sampling Location

The Dryer 1 sampling location meets EPA Method 1 location requirements as indicated in Figure 4-1. Twelve sampling points were used to measure the gas flow rate.

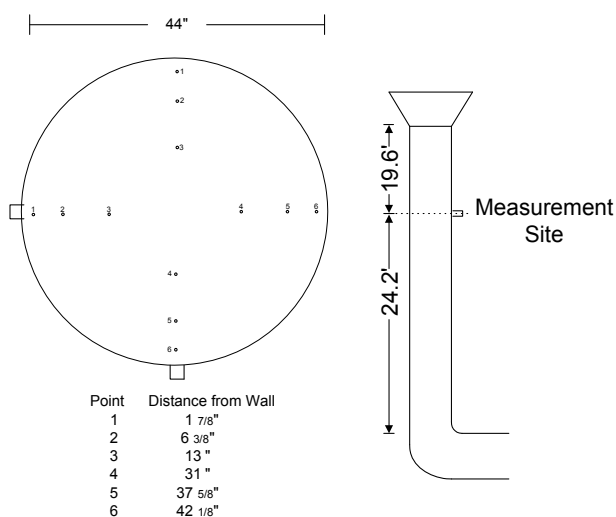


Figure 4-1 Dryer # 1 Stack Sampling Location

The downstream<sup>1</sup> flow disturbance is the stack discharge. The upstream flow disturbance is the duct from the fan entering the base of the stack.

During the sampling program, only the port facing south was used. The port facing east was blocked by the stack support equipment and the Dry Hammermill 1 ductwork. Test personnel reached all of the sampling ports by angling the probe inserted through the south port.

No cyclonic flow conditions were observed in the Dryer 1 stack. The point-by-point cyclonic flow checks indicated an average flow angle 3.1 degrees. This meets the requirements of Section 11.4 of Method 1. A photograph of the Dryer 1 stack is shown in Figure 4-2.



Figure 4-2. Photograph of the Dryer 1 Stack

<sup>1</sup> "Upstream" and "downstream" are defined based on the sampling location as the reference point.

## 4.2 Dryer 2 Stack Sampling Location

The Dryer 2 sampling location meets EPA Method 1 location requirements as indicated in Figure 4-2. Twelve sampling points were used to measure the gas flow rate.

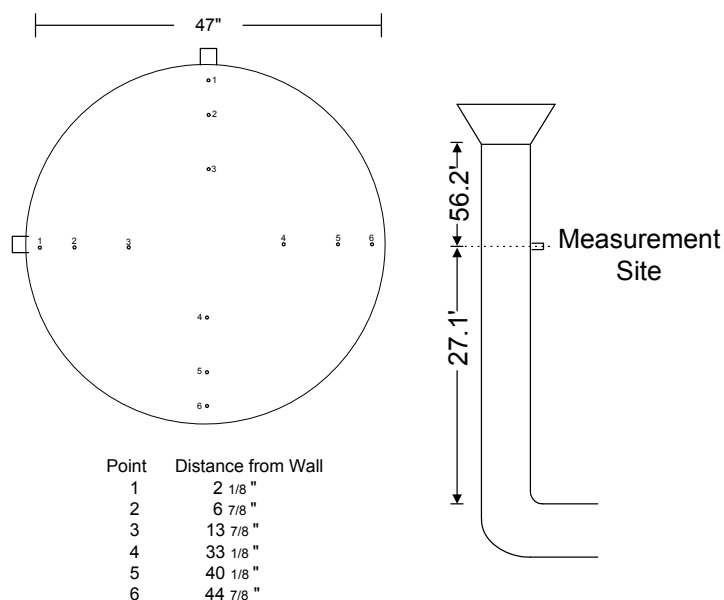


Figure 4-3. Dryer # 2 Stack Sampling Location

The downstream flow disturbance is the stack discharge. The upstream flow disturbance is the duct from the fan entering the base of the stack.

During the sampling program, only the port facing west was used in the test program. The port facing north could not be reached without potentially interrupting operation of the CEM sampling equipment. Test personnel reached all of the sampling ports by angling the probe inserted through the west port.

No cyclonic flow conditions were observed in the Dryer 2 stack. The point-by-point cyclonic flow checks indicated an average flow angle 2.4 degrees. This meets the requirements of Section 11.4 of Method 1. A photograph of the Dryer 2 stack is shown in Figure 4-4.

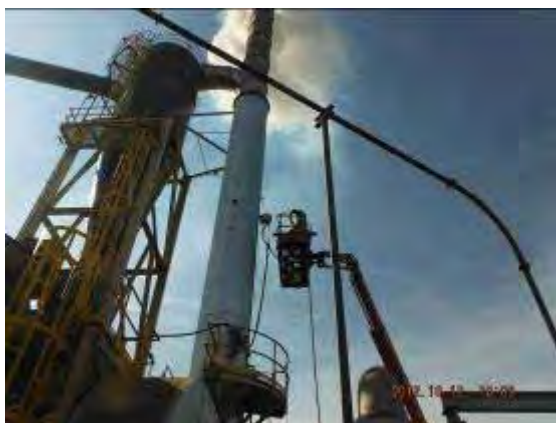


Figure 4-4. Photograph of the Dryer 2 Stack

### 4.3 Dry Hammermill 2 Cyclone Outlet Sampling Location

The Dry Hammermill 2 sampling location meets EPA Method 1 location requirements as indicated in Figure 4-5. Twelve sampling points were used to measure the gas flow rate.

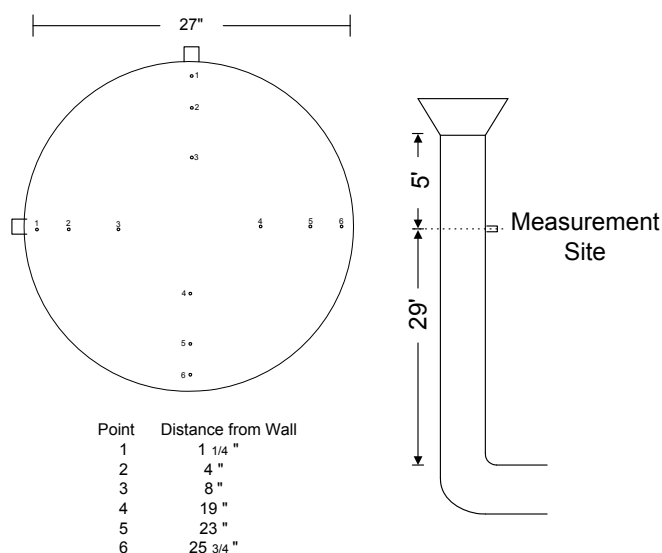


Figure 4-5. Dry Hammermill 2 Sampling Location

The downstream flow disturbance is an elbow in the fan outlet duct. The upstream flow disturbance is the fan discharge. During the sampling program both ports were accessible.

No cyclonic flow conditions were observed in the Dry Hammermill 2 stack. The point-by-point cyclonic flow checks indicated an average flow angle of 0.6 degrees. This meets the requirements of Section 11.4 of Method 1. A photograph of the Dry Hammermill 2 stack is shown in Figure 4-6.



Figure 4-6. Photograph of the Dry Hammermill 2 Sampling Location

#### 4.4 Pellet Mill Aspiration System Sampling Location

The Pellet Mill Aspiration System has a six-inch diameter. Gas flow rate sampling was performed in general accordance with EPA Method 1A. The sampling port location met EPA Method 1 location requirements as indicated in Figure 4-7. A total of eight sampling points were used—four in a horizontal direction and four reached by an angled probe in the vertical direction. Due to the position of the duct and surrounding equipment, it was not possible to sample from any orientation except horizontal.

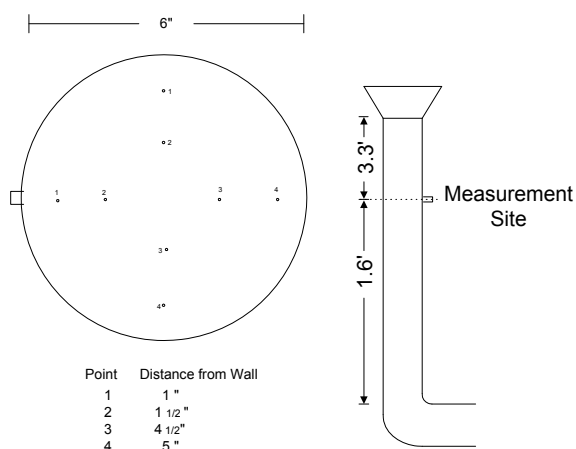


Figure 4-7. Pellet Mill Aspiration System Sampling Location

The upstream flow disturbance was an entry duct from Pellet Mill 6. The downstream flow disturbance was the fan inlet.

No cyclonic flow conditions were observed in the Pellet Mill Aspiration System outlet duct. The point-by-point cyclonic flow checks indicated an average flow angle of 0.75 degrees. This meets the requirements of Section 11.4 of Method 1. A photograph of the Pellet Mill Aspiration System sampling location is shown in Figure 4-8.



Figure 4-8. Photograph of the Pellet Mill Aspiration System Sampling Location



#### 4.5 Pellet Mill 2 Cooler Stack Sampling Location

The Pellet Mill 2 Cooler stack sampling location meets the minimum requirements specified in Method 1, Section 11.1. As indicated in Figure 4-9, the downstream<sup>2</sup> disturbance (stack exit) is 0.6 stack diameters from the sampling location. The minimum allowed by Method 1 is 0.5 stack diameters. The upstream flow disturbance was the fan outlet duct. The distance to the upstream flow disturbance meets Method 1 requirements. Both sampling ports were used in the test program.

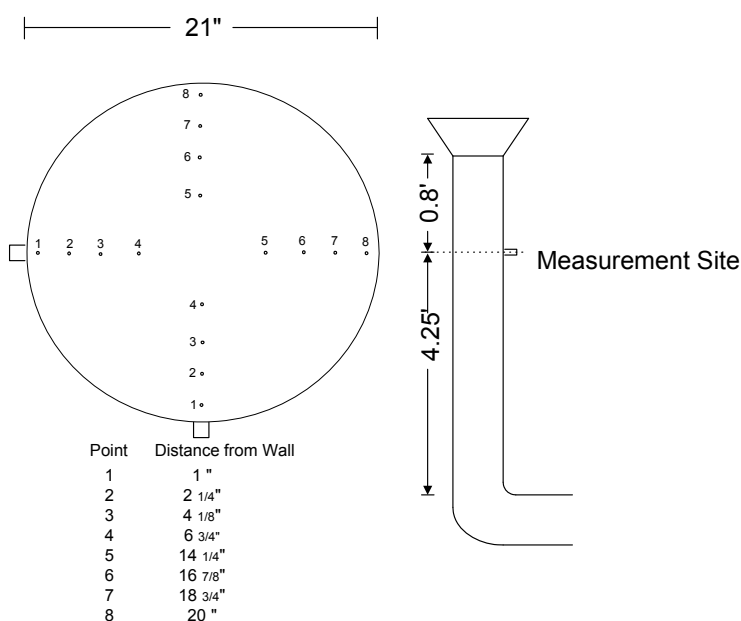


Figure 4-9. Pellet Mill 2 Cooler Stack Sampling Location

No cyclonic flow conditions were observed in the Pellet Mill 2 Cooler stack. The point-by-point cyclonic flow checks indicated an average flow angle of 1.5 degrees. This meets the requirements of Section 11.4 of Method 1. A photograph of the Pellet Cooler 2 stack is shown in Figure 4-10



Figure 4-10. Photograph of the Pellet Cooler 2 Stack

<sup>2</sup> The terms "upstream" and "downstream" are defined based on the test location as the reference point. A recent change in a figure in EPA Method 1 has these terms incorrectly stated.

#### 4.6 Pellet Mill 1 Cooler Stack

The Pellet Mill 1 Cooler stack sampling location meets the minimum requirements specified in Method 1, Section 11.1. As indicated in Figure 4-11, the downstream disturbance (stack exit) is 0.6 stack diameters from the sampling location. The minimum allowed is 0.5 stack diameters. The upstream flow disturbance is the fan outlet duct. The distance to the upstream flow disturbance meets Method 1 requirements. Four of the six sampling ports were used in the test program. The plugs in two of the ports could not be removed.

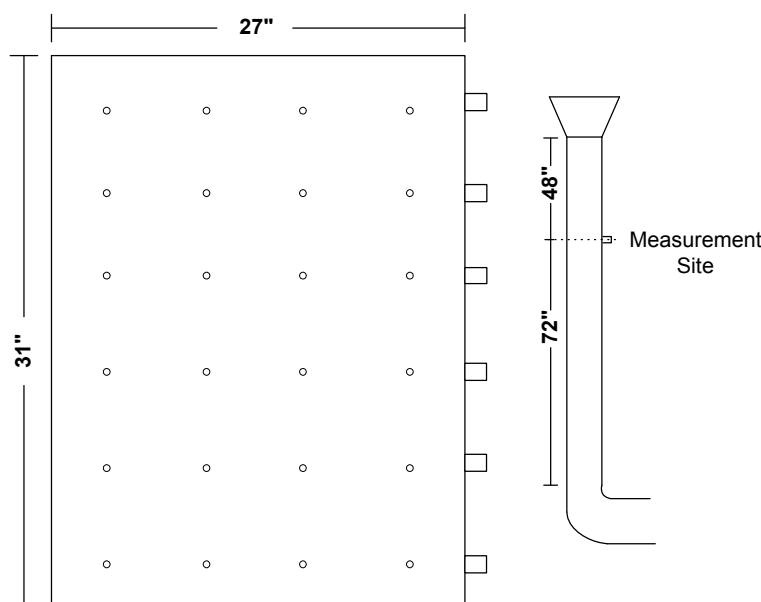


Figure 4-11. Pellet Mill 1 Cooler Stack Sampling Location

No cyclonic flow conditions were observed in the Pellet Mill 1 Cooler stack. The point-by-point cyclonic flow checks indicated an average flow angle of 2.0 degrees. This meets the requirements of Section 11.4 of Method 1. A photograph of the Pellet Mill 1 Cooler Stack is shown in Figure 4-12.



Figure 4-12. Photograph of the Pellet Mill 1 Cooler Stack

#### 4.7 Green Hammermill Stack Sampling Location

The Green Hammermill stack sampling location shown in Figure 4-13 meets the minimum requirements for a downstream flow disturbance specified in Method 1, Section 11.1. The upstream flow disturbance is the fan outlet duct. The downstream flow disturbance is the stack discharge. The distance to the upstream flow disturbance meets Method 1 requirements. Only one sampling port could be reached safely. All of the sampling ports were reached by angling the Pitot tube inserted through the port facing south.

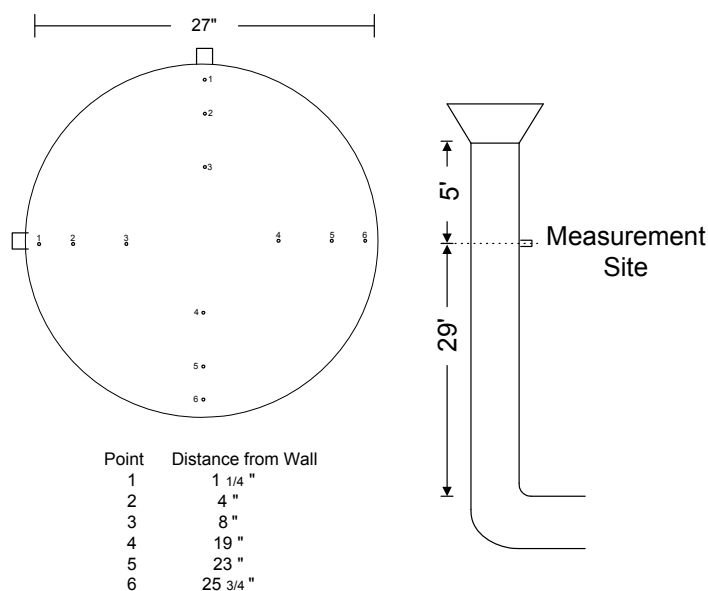


Figure 4-13. Green Hammermill Stack Sampling Location

No cyclonic flow conditions were observed in the Green Hammermill stack. The point-by-point cyclonic flow checks indicated an average flow angle of 1.7 degrees. This meets the requirements of Section 11.4 of Method 1. A photograph of the Green Hammermill stack is shown in Figure 4-14.



Figure 4-14. Photograph of the Green Hammermill Fan Inlet

## **5. TESTING PROCEDURES**

### **5.1 Flue Gas Velocity and Volumetric Flow Rate - EPA Method 2**

The flue gas velocities and volumetric flow rates during all of the emission tests were determined according to the procedures outlined in U.S. EPA Reference Method 2. Velocity measurements were made using S-Type Pitot tubes conforming to the geometric specifications outlined in Method 2. Accordingly, each Pitot was assigned a coefficient of 0.84. Velocity pressures were measured with fluid manometers. Effluent gas temperatures were measured with chromel-alumel thermocouples attached to digital readouts.

### **5.2 Flue Gas Composition and Molecular Weight - EPA Method 3**

Flue gas analyses and calculation of flue gas dry molecular weights were performed in accordance with EPA Method 3. A stainless steel probe was inserted into the gas stream to collect a representative sample of the flue gas during each test run. The samples were analyzed using a Fyrite gas analyzer. Moisture was removed from the sample gas by means of a knockout jar located prior to the sample pump.

### **5.3 Flue Gas Moisture Content - EPA Method 4**

The flue gas moisture content was determined in conjunction with each test run according to the sampling and analytical procedures outlined in EPA Method 4. Wet impinger sampling trains were used to withdraw and analyze the stack gas. The impingers were connected in series and contained water in the first two impingers followed by an empty impinger and then a silica gel impinger. The impingers were contained in an ice bath to assure condensation of the flue gas stream moisture. Any moisture that was not condensed in the impingers was captured in the silica gel; therefore, all moisture was weighed and entered into moisture content calculations.

### **5.4 Total Hydrocarbons – EPA Method 25A**

Continuous emissions monitoring was conducted for volatile organic compounds. The sampling and analytical procedures for VOCs were conducted in accordance with EPA 25A. The CEM system consisted of a sample acquisition system, the THC emission monitor, and a data acquisition system (DAS). A California Analytical Model 300 flame ionization detector was used for the Method 25A tests.

The sample acquisition system included an in-stack probe, a heated out-of-stack glass mat filter for particulate matter removal, a heat-traced Teflon® sample line, a Teflon® heated-head pump, and a gas manifold board. All components of the sample acquisition system that contacted the sampled gas were constructed of Type 316 stainless steel or Teflon®. The sample gas was continuously extracted from a central point within the duct at a constant rate ( $\pm 10\%$ ) for the duration of each test run. The wet, filtered gas was transported to a heated-head pump located at the CEM laboratory. The sample gas was sent directly to the VOC analyzer. Care was taken to ensure that the sample gas was greater than 250°F during transport from the stack to the VOC monitor. All pretest and posttest calibration procedures were performed as outlined in the EPA Reference Method 25A.

Total organic hydrocarbon concentrations were measured on a wet basis using a California Analytical 300 FID continuous emission monitor. The THC concentrations were monitored on a propane (C<sub>3</sub>) basis using a flame ionization detector (FID). The FID was fueled by a gas mixture consisting of 40% helium and 60% hydrogen to reduce the effect of oxygen synergism. The

THC analyzer was calibrated with a set of at least four gas standards. Calibration tests were performed prior to and following each test run.

Outputs from the individual emission monitors were connected to a computerized data acquisition system. Outputs from the analyzer were sent to a portable computer via a National Instruments<sup>TM</sup> FieldPoint controller. The signals were downloaded to a STRATA<sup>®</sup> software program every two seconds. The two-second readings were averaged for the duration of the test run.

Total mass emissions of VOCs were determined based on the Method 25A total hydrocarbon concentration data. The mass emissions were expressed on a pounds mass of carbon per hour.

### 5.5 Organic HAP Compounds – EPA Method 320

Testing for wet-basis organic HAP concentrations was conducted by extractive Fourier transform infrared (FTIR) spectroscopy using EPA Method 320 (40CFR, Part 63, Appendix A). Sample gas was continuously passed through the sampling system, which included an in-stack probe, a heated out-of-stack glass mat filter for particulate matter removal, a Teflon<sup>®</sup> heat-traced sample line, a MIDAC Fourier Transform Infrared (FTIR) spectrometer, a Teflon<sup>®</sup> heated-head pump, and a gas manifold board as shown in Figure 5-1. All components of the sample acquisition system that contacted the sampled gas were Type 316 stainless steel or Teflon<sup>®</sup>. All components of the sampling system and the FTIR cell were maintained at or above 120° C. Air Control Techniques, P.C. took great care to ensure that the sampling system contained no “cold spots” to prevent organic HAP loss. The sampling rate was maintained at approximately 10 liters per minute.

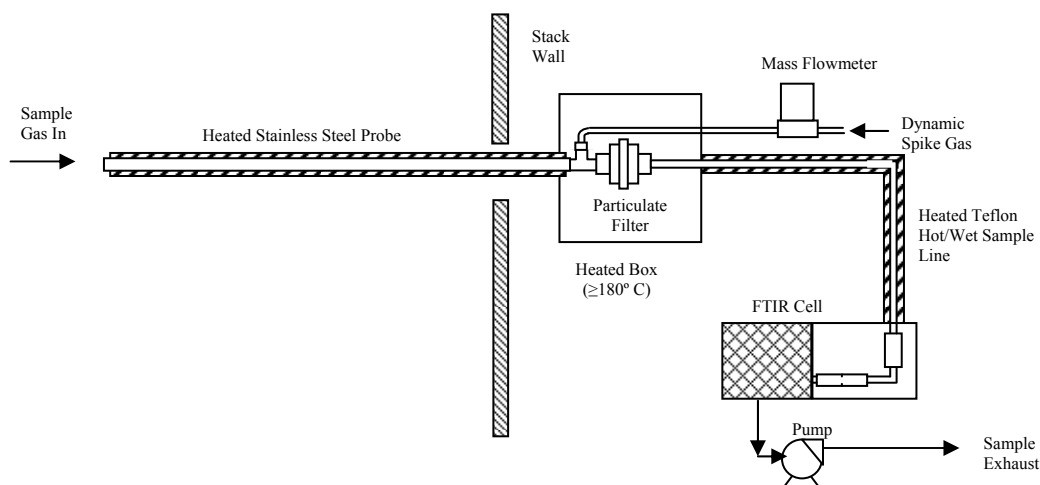


Figure 5-1. Method 320 Organic HAP Sampling System

The FTIR system included a MIDAC Corporation I-1301 spectrometer equipped with a heated, nominal 10-meter path absorption cell, a potassium bromide (KBr) beam splitter, zinc selenide (ZnSe) non-hygroscopic windows, and a liquid nitrogen-cooled Mercury Cadmium Telluride detector. Measurements were made using a MIDAC Model I-1301 high resolution Michelson interferometer with AutoQuant Pro software. Sample gas continuously passed through the sampling system, and sample spectra (based on 50 co-added interferograms) were recorded every

minute. The system's nominal spectral resolution was  $0.5\text{ cm}^{-1}$ . Samples and standards were analyzed at temperatures greater than  $120^{\circ}\text{C}$  and near ambient pressures.

The inside walls of the cells were polished stainless steel to minimize interaction of the sample with the cell walls, and the cell mirrors were of bare gold. The gas pressure in the FTIR sample cell was monitored with a pressure transducer connected directly to the sample cell. The heated sample cell was wrapped in an insulating thermal jacket, and the temperature was controlled with type J thermocouples. The absorption cell volume was approximately 2 liters.

The FTIR system was operated via a portable computer, and a data archive storage system (USB Mass Storage Drive) was used for data backup. All interferograms, single beams, absorbance spectra, and background single beams were stored and have been archived. The filename, time, pressure and temperature of the sample cell, scan rate, background identification and other pertinent information was recorded by hand during the test program.

Air Control Techniques used the program AutoquantPro<sup>TM</sup> Version 4.5.0.195, (©Midac Corporation, 2012) to collect and analyze all the infrared field data. The program allows the development and storage of analytical "methods" for analysis of spectral data (absorbance) files. The reference spectra used for these analyses were developed by MIDAC Corporation, EPA, and Enthalpy Analytical, Inc. One "model" was developed for determining the absorption path length and one additional "method" for determining the concentrations of the target compounds for each source.

The concentration uncertainty reported by AutoquantPro is called the Standard Error of the Estimated Concentration, or SEC; it is also known as the Marginal Standard Deviation. The uncertainties in the concentration are proportional to the square root of the sums of the squares of the residual. After the residual spectrum is obtained, which we will call R, the error variance for the case of a single reference spectrum is calculated as follows.

$$\sigma^2 = \frac{\sum_i R_i^2}{(n-1)}$$

Where n is the number of observations. The SEC is given by the following.

$$SEC = \frac{\sigma C}{\sqrt{\sum_i A_i^2}}$$

Where **A** is the spectrum and **C** is the known concentration of the reference.

The 95% confidence interval is 1.96 times the SEC.

## **6. QUALITY ASSURANCE**

### **6.1 Method 1 Quality Assurance**

All S-type Pitot tubes used in this project conformed to EPA guidelines concerning construction and geometry. Pitot tubes were inspected prior to use. Information pertaining to S-type Pitot tubes is presented in detail in Section 3.1.1 of EPA Publication No. 600/4-77-027b. Only S-type Pitot tubes meeting the required EPA specifications were used in this project.

The thermocouples used in this project were calibrated using the procedures described in Section 3.4.2 of EPA Publication No. 600/4-77-027b. Each temperature sensor was calibrated at a minimum of three points over the anticipated range of use against NIST-traceable mercury in glass thermometer.

### **6.2 Method 4 Quality Assurance**

Pretest and posttest leak checks were conducted on each Method 4 sampling train used. The observed leak rates for the sampling trains were below 0.02 actual cubic feet per minute as required by Method 4.

All dry gas meters were fully calibrated to determine the volume correction factor prior to field use. Post-tests calibration checks were performed as soon as possible after the equipment was returned to the laboratory. Pre-and post-test calibrations agreed within  $\pm 5$  percent. The calibration procedure is documented in Section 3.3.2 of EPA Publication No. 600/4-77-237b.

The scales used at the test location to determine flue gas moisture content were calibrated using a standard set of weights.

### **6.3 Method 25A Quality Assurance**

At the beginning of the test day, a linearity calibration test was performed on each analyzer. The continuous emission monitoring instrument response did not differ by more  $\pm 5$  from the propane calibration standard. Linearity results for the test program are provided in Table 6-1 through 6-8.

Prior to and following each test run, a system calibration test was performed. The system test was performed to verify that the sampling system did not contain leaks (system bias) and to measure a change in analyzer response during the test program (system drift). The system bias was less than  $\pm 5\%$  of full-scale, and system drift was less than  $\pm 3\%$  of full scale. System calibration results for the test program are provided in Tables 6-1 through 6-8.

| Table 6-1. Dryer 1 Quality Assurance Results,<br>Total Hydrocarbons, Method 25A |           |             |       |       |
|---------------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                                 |           |             |       |       |
| Parameter                                                                       | Allowable | Test Series |       |       |
| Zero, %                                                                         | ±5        | 0.0         |       |       |
| Low, %                                                                          | ±5        | 0.4         |       |       |
| Mid, %                                                                          | ±5        | 2.2         |       |       |
| High, %                                                                         | ±5        | 0.0         |       |       |
| System Tests                                                                    |           |             |       |       |
| Parameter                                                                       | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                              | ±5        | 0.0         | 0.8   | 0.1   |
| Zero Bias (Post), %                                                             | ±5        | 0.9         | 0.1   | 0.0   |
| Up-scale Bias (Pre), %                                                          | ±5        | 0.0         | -0.2  | -0.6  |
| Up-scale Bias (Post), %                                                         | ±5        | 0.1         | -0.6  | -1.0  |
| Zero Drift, %                                                                   | ±3        | 0.9         | -0.7  | -0.2  |
| Up-scale Drift, %                                                               | ±3        | 0.1         | -0.4  | -0.4  |
| Response Time, sec                                                              | N/A       |             |       |       |

| Table 6-2. Pellet Cooler 1 Quality Assurance Results,<br>Total Hydrocarbons, Method 25A |           |             |       |       |
|-----------------------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                                         |           |             |       |       |
| Parameter                                                                               | Allowable | Test Series |       |       |
| Zero, %                                                                                 | ±5        | 0.1         |       |       |
| Low, %                                                                                  | ±5        | 0.4         |       |       |
| Mid, %                                                                                  | ±5        | 0.8         |       |       |
| High, %                                                                                 | ±5        | 0.0         |       |       |
| System Tests                                                                            |           |             |       |       |
| Parameter                                                                               | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                                      | ±5        | 0.0         | 0.3   | 0.2   |
| Zero Bias (Post), %                                                                     | ±5        | 0.3         |       | 0.3   |
| Up-scale Bias (Pre), %                                                                  | ±5        | 0.1         | -0.1  | -0.1  |
| Up-scale Bias (Post), %                                                                 | ±5        | -0.1        |       | 0.3   |
| Zero Drift, %                                                                           | ±3        | 0.3         | -0.1  | 0.1   |
| Up-scale Drift, %                                                                       | ±3        | -0.1        | 0.0   | -0.1  |
| Response Time, sec                                                                      | N/A       |             |       |       |



| Table 6-3. Dryer 2 Quality Assurance Results,<br>Total Hydrocarbons, Method 25A, High Range |           |             |       |       |
|---------------------------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                                             |           |             |       |       |
| Parameter                                                                                   | Allowable | Test Series |       |       |
| Zero, %                                                                                     | ±5        | 0.1         |       |       |
| Low, %                                                                                      | ±5        | 0.3         |       |       |
| Mid, %                                                                                      | ±5        | -0.1        |       |       |
| High, %                                                                                     | ±5        | 0.0         |       |       |
| System Tests                                                                                |           |             |       |       |
| Parameter                                                                                   | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                                          | ±5        | 0.0         | 0.1   | -0.1  |
| Zero Bias (Post), %                                                                         | ±5        | 0.1         | -0.1  | -0.1  |
| Up-scale Bias (Pre), %                                                                      | ±5        | 0.0         | -0.3  | -0.4  |
| Up-scale Bias (Post), %                                                                     | ±5        | -0.3        | -0.4  | -0.3  |
| Zero Drift, %                                                                               | ±3        | 0.1         | -0.1  | 0.0   |
| Up-scale Drift, %                                                                           | ±3        | -0.3        | -0.1  | 0.1   |
| Response Time, sec                                                                          | N/A       | 28          |       |       |

| Table 6-4. Dryer 2 Quality Assurance Results,<br>Total Hydrocarbons, Method 25A, Low Range |           |             |       |       |
|--------------------------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                                            |           |             |       |       |
| Parameter                                                                                  | Allowable | Test Series |       |       |
| Zero, %                                                                                    | ±8        | 1.0         |       |       |
| Low, %                                                                                     | ±8        | 1.5         |       |       |
| Mid, %                                                                                     | ±8        | 0.7         |       |       |
| High, %                                                                                    | ±8        | 0.1         |       |       |
| System Tests                                                                               |           |             |       |       |
| Parameter                                                                                  | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                                         | ±5        | 0.0         | 0.6   | -0.6  |
| Zero Bias (Post), %                                                                        | ±5        | 0.6         | -0.6  | -0.7  |
| Up-scale Bias (Pre), %                                                                     | ±5        | 0.0         | 0.3   | 0.1   |
| Up-scale Bias (Post), %                                                                    | ±5        | 0.3         | 0.1   | -0.1  |
| Zero Drift, %                                                                              | ±3        | 0.6         | -1.2  | -0.1  |
| Up-scale Drift, %                                                                          | ±3        | 0.3         | -0.2  | -0.2  |
| Response Time, sec                                                                         | N/A       | 28          |       |       |

| Table 6-5. Dry Hammermill 2 Quality Assurance Results,<br>Total Hydrocarbons, Method 25A |           |             |       |       |
|------------------------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                                          |           |             |       |       |
| Parameter                                                                                | Allowable | Test Series |       |       |
| Zero, %                                                                                  | ±5        | 0.0         |       |       |
| Low, %                                                                                   | ±5        | 0.4         |       |       |
| Mid, %                                                                                   | ±5        | 2.2         |       |       |
| High, %                                                                                  | ±5        | 0.0         |       |       |
| System Tests                                                                             |           |             |       |       |
| Parameter                                                                                | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                                       | ±5        | 0.2         | 0.0   | 0.2   |
| Zero Bias (Post), %                                                                      | ±5        | 0.0         | 0.2   | 0.2   |
| Up-scale Bias (Pre), %                                                                   | ±5        | -1.3        | -1.1  | -1.3  |
| Up-scale Bias (Post), %                                                                  | ±5        | -1.1        | -1.3  | -1.2  |
| Zero Drift, %                                                                            | ±3        | -0.1        | 0.1   | 0.0   |
| Up-scale Drift, %                                                                        | ±3        | 0.2         | -0.1  | 0.0   |
| Response Time, sec                                                                       | N/A       | 28          |       |       |

| Table 6-6 Pellet Cooler 2 Quality Assurance Results,<br>Total Hydrocarbons, Method 25A |           |             |       |       |
|----------------------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                                        |           |             |       |       |
| Parameter                                                                              | Allowable | Test Series |       |       |
| Zero, %                                                                                | ±5        | 0           |       |       |
| Low, %                                                                                 | ±5        | 0.4         |       |       |
| Mid, %                                                                                 | ±5        | 2.2         |       |       |
| High, %                                                                                | ±5        | 0.0         |       |       |
| System Tests                                                                           |           |             |       |       |
| Parameter                                                                              | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                                     | ±5        | 0.0         | 0.3   | 0.1   |
| Zero Bias (Post), %                                                                    | ±5        | 0.3         | 0.1   | 0.2   |
| Up-scale Bias (Pre), %                                                                 | ±5        | -1.0        | -0.9  | -1.0  |
| Up-scale Bias (Post), %                                                                | ±5        | -0.9        | -1.0  | -1.3  |
| Zero Drift, %                                                                          | ±3        | 0.3         | -0.2  | 0.0   |
| Up-scale Drift, %                                                                      | ±3        | 0.1         | -0.1  | -0.3  |
| Response Time, sec                                                                     | N/A       | 28          |       |       |

| Table 6-7. Aspiration Quality Assurance Results,<br>Total Hydrocarbons, Method 25A |           |             |       |       |
|------------------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                                    |           |             |       |       |
| Parameter                                                                          | Allowable | Test Series |       |       |
| Zero, %                                                                            | ±5        | 0.1         |       |       |
| Low, %                                                                             | ±5        | 0.7         |       |       |
| Mid, %                                                                             | ±5        | 0.0         |       |       |
| High, %                                                                            | ±5        | 0.1         |       |       |
| System Tests                                                                       |           |             |       |       |
| Parameter                                                                          | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                                 | ±5        | 0.0         | 0.1   | 0.0   |
| Zero Bias (Post), %                                                                | ±5        | 0.1         | 0.0   | 0.1   |
| Up-scale Bias (Pre), %                                                             | ±5        | 0.0         | -0.1  | -0.1  |
| Up-scale Bias (Post), %                                                            | ±5        | -0.1        | -0.1  | -0.3  |
| Zero Drift, %                                                                      | ±3        | 0.1         | -0.1  | 0.1   |
| Up-scale Drift, %                                                                  | ±3        | -0.1        | 0.1   | -0.3  |
| Response Time, sec                                                                 | N/A       | 28          |       |       |

| Table 6-8. Green Hammermill Quality Assurance Results,<br>Total Hydrocarbons, Method 25A |           |             |       |       |
|------------------------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                                          |           |             |       |       |
| Parameter                                                                                | Allowable | Test Series |       |       |
| Zero, %                                                                                  | ±5        | 0.0         |       |       |
| Low, %                                                                                   | ±5        | 1.1         |       |       |
| Mid, %                                                                                   | ±5        | 1.6         |       |       |
| High, %                                                                                  | ±5        | 0.4         |       |       |
| System Tests                                                                             |           |             |       |       |
| Parameter                                                                                | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                                       | ±5        | 0.0         | 0.1   | 0.1   |
| Zero Bias (Post), %                                                                      | ±5        | 0.1         | 0.1   | 0.1   |
| Up-scale Bias (Pre), %                                                                   | ±5        | 0.0         | -0.1  | -0.7  |
| Up-scale Bias (Post), %                                                                  | ±5        | -0.1        | -0.7  | -1.0  |
| Zero Drift, %                                                                            | ±3        | 0.1         | -0.1  | 0.1   |
| Up-scale Drift, %                                                                        | ±3        | -0.1        | -0.5  | -0.3  |
| Response Time, sec                                                                       | N/A       | 28          |       |       |

#### 6.4 Method 320 Quality Assurance

Air Control Techniques, P.C. performed daily quality assurance checks. Background scans and calibration transfer standard (CTS) spectra tests were performed prior to and following each test series. An analyte spike was performed using methanol.

The flow rate at the outlet of the pump was measured while the probe was plugged to verify that the sampling system was leaks. The flow rate was less than 200 ml/min.

The FTIR cell was tested for leaks by closing the value while the cell was at minimum absolute pressure.

#### Background Spectra

Sample spectra were divided point-by-point by a 128-scan background recorded using N<sub>2</sub>. The single beam spectrum was constantly monitored, and a new background was generated approximately following each test series or when residual and absorbance spectra indicated component build-up on the optical surfaces or alignment-related baseline shifts.

#### Calibration Transfer Standards and Absorption Path Lengths

A cylinder of 100 ppm ethylene in nitrogen served as the CTS. A CTS gas was introduced to the FTIR and allowed to reach steady state. The CTS was used to determine effective cell path length based on comparisons of the “field” CTS spectra to a laboratory CTS spectrum recorded by MIDAC. As shown in Table 6-9, the maximum path length deviation was less than 5% of the average.

| Table 6-9. CTS Results Summary |      |                          |              |                      |                      |                            |                           |
|--------------------------------|------|--------------------------|--------------|----------------------|----------------------|----------------------------|---------------------------|
| Date                           | Time | CTS Scan<br>(pathlength) | SEC<br>(ppm) | Cell Press.<br>(psi) | Cell Temp<br>(deg C) | Deviation from<br>Previous | Deviation from<br>Average |
| 10-Oct                         | 806  | 8.78                     | 0.137        | 14.7                 | 121                  | NA                         | -0.6%                     |
|                                | 1927 | 8.68                     | 0.120        | 14.89                | 121                  | 1.1%                       | 0.5%                      |
| 11-Oct                         | 1121 | 8.73                     | 0.134        | 14.8                 | 121                  | -0.6%                      | -0.1%                     |
|                                | 1301 | 8.73                     | 0.133        | 14.7                 | 121                  | 0.0%                       | -0.1%                     |
|                                | 1755 | 8.75                     | 0.133        | 14.6                 | 121                  | -0.3%                      | -0.3%                     |
|                                | 2204 | 8.72                     | 0.133        | 14.8                 | 121                  | 0.4%                       | 0.1%                      |
| 12-Oct                         | 0809 | 8.59                     | 0.133        | 14.9                 | 121                  | 1.4%                       | 1.5%                      |
|                                | 1300 | 8.77                     | 0.137        | 14.6                 | 121                  | -2.1%                      | -0.5%                     |
|                                | 1940 | 8.78                     | 0.134        | 14.72                | 121                  | -0.1%                      | -0.6%                     |
| 13-Oct                         | 0810 | 8.71                     | 0.134        | 14.82                | 121                  | 0.7%                       | 0.1%                      |
|                                | 1435 | 8.73                     | 0.135        | 14.85                | 121                  | -0.1%                      | 0.0%                      |
| Average                        |      | 8.725                    | 0.133        |                      |                      |                            |                           |

#### Background Spectra

On-site test personnel performed matrix spiking using a certified calibration standard of methanol and SF<sub>6</sub>. The methanol gas standard was introduced into the sampling system upstream of the particulate matter filter at an average dilution ratio of less than 10% of the total sample volume. Analyte spiking was performed to demonstrate the suitability of the sampling system. The dilution factor was calculated based on the ratio of the SF<sub>6</sub> tracer gas analyzed directly by the FTIR and the in-stack measured concentration.

$$\frac{SF_6 \text{ during spike}}{SF_6 \text{ direct}} = DF$$

The recovery was calculated using the mean concentration of the spiked analyte ( $S_m$ ), the native concentration of the analyte in the stack ( $S_u$ ), the dilution factor (DF), and the cylinder concentration ( $C_s$ ).

$$\text{Recovery}(\%) = \frac{S_m - S_u (1 - DF)}{DF \times C_s}$$

As shown in Table 6-10, the percent recovery was  $100 \pm 30\%$  as required by Method 320.

| Table 6-10. Spike Recovery Results Summary |                 |                        |                 |                           |                 |             |
|--------------------------------------------|-----------------|------------------------|-----------------|---------------------------|-----------------|-------------|
| Direct Cylinder Spike, ppm                 |                 | System Spiked Gas, ppm |                 | Native Concentration, ppm |                 | Recovery, % |
| methanol                                   | SF <sub>6</sub> | methanol               | SF <sub>6</sub> | methanol                  | SF <sub>6</sub> |             |
| 101.26                                     | 2.84            | 9.867                  | 0.272           | 0.496                     | -0.00789        | 94.6        |

#### Minimum Detectable Concentration

EPA Method 320 and the equivalent ASTM Standard D6348-03 specify a number of analytical uncertainty parameters that the analyst may calculate to characterize the FTIR system performance.

#### QA Review

Before the test program began, an analysis of possible analytical interferents (e.g., H<sub>2</sub>O, CO<sub>2</sub>, CO, pinenes) based on previous stack test data. Analytical wavelengths were determined to minimize analytical uncertainty and detection limits using reference spectra and the FTIR instrument that was used for the field testing.

At the conclusion of the testing a quality assurance review of the test data was performed. This review included examination of the sample spectra and the quantitative analytical results. It also included spot-checking the analysis results by hand. These examinations included visual comparisons of the sample and reference spectra.

## **7. PROCESS DOCUMENTATION**

Enviva Pellets Wiggins, LLC personnel logged the following process data during each test run of each process unit.

- Throughput in tons per hour (all process units)
- Inlet temperature (dryer)
- Outlet temperature (dryer)
- Cyclone static pressure drop (dryer, hammermill, presses)
- Wood feed % softwood content

## 8. REFERENCES

1. Enviva, LP. "Emission Testing Protocol." Submitted to Mississippi Department of Environmental Quality, July 31, 2013.
2. Environmental Monitoring Laboratories, Inc. "Investigative Air Emissions Tests, Enviva Pellets Wiggins, LLC.", November 15-16, 2012" Report to Enviva, LP, January 13, 2013.
3. Air Compliance Testing, Inc. "Self-Evaluation Engineering Study Test Report, Determination of Hydrogen Chloride Removal Efficiency and Total Gaseous Organic Emissions." Report to Georgia Biomass, LLC, August 27, 2012.
4. Richards, J., D. Goshaw, and T. Holder. "Laboratory Evaluation of VOC Emissions from Wood Pellet Processes." Report to Enviva, LP. July 31, 2013.
5. Beauchemin, P. and M. Tampier. "Emissions and Air Pollution Control for the Biomass Pellet Manufacturing Industry." Report submitted to the British Columbia Ministry of the Environment. May 12, 2010.
6. Milota, M.R. "Emissions from Wood Drying" Forest Projects Journal, Volume 50, Number 6, Pages 10-19, June 2000.
7. Milota, M. and P. Mosher. "Emissions of Hazardous Air Pollutants from Lumber Drying." Forest Products Journal, Volume 58, No. 7/8, Pages 50-55, July/August 2008.

## **APPENDIX A**

### **Moisture and Gas Flow Rate Data**



## Air Control Techniques, PC: Emissions Calculations

Job # 1911

| Enviva                          | Wiggins                           | Green<br>Hammermill | Green<br>Hammermill | Green<br>Hammermill | Dryer 1    | Dryer 1    | Dryer 1    |
|---------------------------------|-----------------------------------|---------------------|---------------------|---------------------|------------|------------|------------|
| PARAMETER                       | NOMENCLATURE                      | 1                   | 2                   | 3                   | 4          | 5          | 6          |
| Sampling Location               |                                   | Green<br>Hammermill | Green<br>Hammermill | Green<br>Hammermill | Dryer 1    | Dryer 1    | Dryer 1    |
| Date                            |                                   | 10/10/2013          | 10/10/2013          | 10/10/2013          | 10/10/2013 | 10/11/2013 | 10/11/2013 |
| Run Time                        | $\theta$                          | 60                  | 60                  | 60                  | 60         | 60         | 60         |
| Nozzle Diameter                 | inches                            | N/A                 | N/A                 | N/A                 | N/A        | N/A        | N/A        |
| Stack Area                      | As - sq. ft.                      | 3.98                | 3.98                | 3.98                | 10.56      | 10.56      | 10.56      |
| Pitot Tube Coefficient          | Cp                                | 0.84                | 0.84                | 0.84                | 0.84       | 0.84       | 0.84       |
| Meter Calibration Factor        | Y                                 | 0.9828              | 0.9828              | 0.9828              | 0.9828     | 0.9828     | 0.9828     |
| Barometric Pressure, inches Hg  | Bp - in. Hg                       | 29.90               | 29.90               | 29.90               | 29.90      | 29.80      | 29.80      |
| Static Pressure                 | Pg - in. H <sub>2</sub> O         | -20.8               | -20.8               | -20.8               | -0.75      | -0.71      | -0.71      |
| Stack Pressure                  | Ps                                | 28.37               | 28.37               | 28.37               | 29.84      | 29.75      | 29.75      |
| Meter Box Pressure Differential | $\Delta H$ - in. H <sub>2</sub> O | 1.00                | 1.00                | 1.00                | 1.00       | 1.00       | 1.00       |
| Average Velocity Head           | $\Delta p$ - in. H <sub>2</sub> O | 3.961               | 3.854               | 3.847               | 1.283      | 1.172      | 1.185      |
| Volume of Gas Sampled           | Vm - cu. ft.                      | 33.868              | 33.981              | 33.156              | 33.201     | 33.221     | 32.565     |
| Dry Gas Meter Temperature       | Tm - °F                           | 66.0                | 70.8                | 75.5                | 81.250     | 76.5       | 87.0       |
| Stack Temperature               | Ts - °F                           | 70.8                | 70.6                | 70.9                | 146.3      | 150.1      | 147.3      |
| Liquid Collected                | grams                             | 25.1                | 26.5                | 16.6                | 129.5      | 99.8       | 117.5      |
| Carbon Dioxide                  | % CO <sub>2</sub>                 | 0                   | 0                   | 0                   | 2          | 4          | 4          |
| Oxygen                          | % O <sub>2</sub>                  | 20.9                | 20.9                | 20.9                | 19         | 17         | 17         |
| Carbon Monoxide                 | % CO                              | 0                   | 0                   | 0                   | 0          | 0          | 0          |
| Nitrogen                        | % N <sub>2</sub>                  | 79.1                | 79.1                | 79.1                | 79         | 79         | 79         |
| Volume of Gas Sampled, Dry      | Vmstd - cu. ft.                   | 33.472              | 33.283              | 32.187              | 31.888     | 32.082     | 30.845     |
| Volume of Water Vapor           | Vwstd - cu. ft.                   | 1.183               | 1.249               | 0.783               | 6.106      | 4.706      | 5.540      |
| Moisture Content                | % H <sub>2</sub> O                | 3.41                | 3.62                | 2.37                | 16.07      | 12.79      | 15.23      |
| Saturation Moisture             | % H <sub>2</sub> O                | 2.7                 | 2.7                 | 2.7                 | 23.1       | 25.4       | 23.7       |
| Dry Mole Fraction               | Mfd                               | 0.966               | 0.964               | 0.976               | 0.839      | 0.872      | 0.848      |
| Fuel Factor                     | Fo                                | #DIV/0!             | #DIV/0!             | #DIV/0!             | 0.950      | 0.975      | 0.975      |
| Gas Molecular Weight, Dry       | Md                                | 28.84               | 28.84               | 28.84               | 29.08      | 29.32      | 29.32      |
| Gas Molecular Weight, Wet       | Ms                                | 28.47               | 28.44               | 28.58               | 27.30      | 27.87      | 27.60      |
| Gas Velocity                    | vs - ft./sec.                     | 115.87              | 114.32              | 113.97              | 70.16      | 66.68      | 67.23      |
| Volumetric Air Flow, Actual     | Qaw - ACFM                        | 27,642              | 27,273              | 27,189              | 44,448     | 42,243     | 42,593     |
| Volumetric Air Flow, Standard   | Qsd - DSCFM                       | 25,184              | 24,803              | 25,031              | 32,404     | 31,700     | 31,215     |

## Air Control Techniques, PC: Emissions Calculations

Job # 1911

| Enviva                          | Wiggins                           | Dry<br>Hammermill 2 | Dry<br>Hammermill 2 | Dry Hammermill<br>2 | Pellet Mill 2<br>Aspiration | Pellet Mill 2<br>Aspiration | Pellet Mill 2<br>Aspiration |
|---------------------------------|-----------------------------------|---------------------|---------------------|---------------------|-----------------------------|-----------------------------|-----------------------------|
| PARAMETER                       | NOMENCLATURE                      | 10                  | 11                  | 12                  | 16                          | 17                          | 18                          |
| Sampling Location               |                                   | Dry<br>Hammermill 2 | Dry<br>Hammermill 2 | Dry Hammermill<br>2 | Pellet Mill 2<br>Aspiration | Pellet Mill 2<br>Aspiration | Pellet Mill 2<br>Aspiration |
| Date                            |                                   | 10/11/2013          | 10/11/2001          | 10/11/2013          | 10/12/2013                  | 10/12/2013                  | 10/12/2013                  |
| Run Time                        | $\theta$                          | 60                  | 60                  | 60                  | 60                          | 60                          | 60                          |
| Nozzle Diameter                 | inches                            | N/A                 | N/A                 | N/A                 | N/A                         | N/A                         | N/A                         |
| Stack Area                      | As - sq. ft.                      | 2.64                | 2.64                | 2.64                | 0.20                        | 0.20                        | 0.20                        |
| Pitot Tube Coefficient          | Cp                                | 0.84                | 0.84                | 0.84                | 0.84                        | 0.84                        | 0.84                        |
| Meter Calibration Factor        | Y                                 | 0.9828              | 0.9828              | 0.9828              | 0.9828                      | 0.9828                      | 0.9828                      |
| Barometric Pressure, inches Hg  | Bp - in Hg                        | 29.80               | 29.80               | 29.80               | 29.85                       | 29.85                       | 29.85                       |
| Static Pressure                 | Pg - in. H <sub>2</sub> O         | 1.4                 | 1.4                 | 1.4                 | -7.5                        | -7.5                        | -7.5                        |
| Stack Pressure                  | Ps                                | 29.90               | 29.90               | 29.90               | 29.30                       | 29.30                       | 29.30                       |
| Meter Box Pressure Differential | $\Delta H$ - in. H <sub>2</sub> O | 1.00                | 1.00                | 1.00                | 1.00                        | 1.00                        | 1.00                        |
| Average Velocity Head           | $\Delta p$ - in. H <sub>2</sub> O | 2.601               | 2.308               | 2.618               | 5.359                       | 4.944                       | 4.547                       |
| Volume of Gas Sampled           | Vm - cu. ft.                      | 33.419              | 33.679              | 33.876              | 33.241                      | 32.149                      | 34.408                      |
| Dry Gas Meter Temperature       | Tm - °F                           | 80.3                | 78.8                | 78.3                | 85.0                        | 84.8                        | 81.8                        |
| Stack Temperature               | Ts - °F                           | 122.4               | 128.2               | 116.4               | 148.6                       | 148.3                       | 152.1                       |
| Liquid Collected                | grams                             | 30.2                | 30                  | 30.2                | 256.8                       | 269.6                       | 274.4                       |
| Carbon Dioxide                  | % CO <sub>2</sub>                 | 0                   | 0                   | 0                   | 0                           | 0                           | 0                           |
| Oxygen                          | % O <sub>2</sub>                  | 20.9                | 20.9                | 20.9                | 20.9                        | 20.9                        | 20.9                        |
| Carbon Monoxide                 | % CO                              | 0                   | 0                   | 0                   | 0                           | 0                           | 0                           |
| Nitrogen                        | % N <sub>2</sub>                  | 79.1                | 79.1                | 79.1                | 79.1                        | 79.1                        | 79.1                        |
| Volume of Gas Sampled, Dry      | Vmstd - cu. ft.                   | 32.050              | 32.389              | 32.609              | 31.654                      | 30.628                      | 32.962                      |
| Volume of Water Vapor           | Vwstd - cu. ft.                   | 1.424               | 1.415               | 1.424               | 12.108                      | 12.712                      | 12.938                      |
| Moisture Content                | % H <sub>2</sub> O                | 4.25                | 4.18                | 4.18                | 27.67                       | 29.33                       | 28.19                       |
| Saturation Moisture             | % H <sub>2</sub> O                | 12.3                | 14.4                | 10.4                | 24.9                        | 24.7                        | 27.2                        |
| Dry Mole Fraction               | Mfd                               | 0.957               | 0.958               | 0.958               | 0.723                       | 0.707                       | 0.718                       |
| Fuel Factor                     | Fo                                | #DIV/0!             | #DIV/0!             | #DIV/0!             | #DIV/0!                     | #DIV/0!                     | #DIV/0!                     |
| Gas Molecular Weight, Dry       | Md                                | 28.84               | 28.84               | 28.84               | 28.84                       | 28.84                       | 28.84                       |
| Gas Molecular Weight, Wet       | Ms                                | 28.38               | 28.38               | 28.38               | 25.84                       | 25.66                       | 25.78                       |
| Gas Velocity                    | vs - ft./sec.                     | 95.95               | 90.82               | 95.74               | 149.06                      | 143.63                      | 137.85                      |
| Volumetric Air Flow, Actual     | Qaw - ACFM                        | 15,197              | 14,385              | 15,165              | 1,756                       | 1,692                       | 1,624                       |
| Volumetric Air Flow, Standard   | Qsd - DSCFM                       | 13,183              | 12,366              | 13,303              | 1,079                       | 1,016                       | 985                         |

## Air Control Techniques, PC: Emissions Calculations

Job # 1911

| Enviva                          | Wiggins                           | Dryer 2    | Dryer 2    | Dryer 2    |
|---------------------------------|-----------------------------------|------------|------------|------------|
| PARAMETER                       | NOMENCLATURE                      | 19         | 20         | 21         |
| Sampling Location               |                                   | Dryer 2    | Dryer 2    | Dryer 2    |
| Date                            |                                   | 10/13/2013 | 10/13/2013 | 10/13/2013 |
| Run Time                        | $\theta$                          | 60         | 60         | 60         |
| Nozzle Diameter                 | inches                            | N/A        | N/A        | N/A        |
| Stack Area                      | As - sq. ft.                      | 12.05      | 12.05      | 12.05      |
| Pitot Tube Coefficient          | Cp                                | 0.84       | 0.84       | 0.84       |
| Meter Calibration Factor        | Y                                 | 0.9828     | 0.9828     | 0.9828     |
| Barometric Pressure, inches Hg  | Bp - in Hg                        | 29.90      | 29.90      | 29.90      |
| Static Pressure                 | Pg - in. H <sub>2</sub> O         | -0.33      | -0.33      | -0.33      |
| Stack Pressure                  | Ps                                | 29.88      | 29.88      | 29.88      |
| Meter Box Pressure Differential | $\Delta H$ - in. H <sub>2</sub> O | 1.00       | 1.00       | 1.00       |
| Average Velocity Head           | $\Delta p$ - in. H <sub>2</sub> O | 0.285      | 0.300      | 0.291      |
| Volume of Gas Sampled           | Vm - cu. ft.                      | 31.888     | 33.650     | 30.796     |
| Dry Gas Meter Temperature       | Tm - °F                           | 77.5       | 89.5       | 90.3       |
| Stack Temperature               | Ts - °F                           | 174.3      | 154.9      | 171.8      |
| Liquid Collected                | grams                             | 267.7      | 287.5      | 260        |
| Carbon Dioxide                  | % CO <sub>2</sub>                 | 4.5        | 4          | 4          |
| Oxygen                          | % O <sub>2</sub>                  | 16.5       | 17         | 17         |
| Carbon Monoxide                 | % CO                              | 0          | 0          | 0          |
| Nitrogen                        | % N <sub>2</sub>                  | 79         | 79         | 79         |
| Volume of Gas Sampled, Dry      | Vmstd - cu. ft.                   | 30.841     | 31.834     | 29.094     |
| Volume of Water Vapor           | Vwstd - cu. ft.                   | 12.622     | 13.556     | 12.259     |
| Moisture Content                | % H <sub>2</sub> O                | 29.04      | 29.86      | 29.64      |
| Saturation Moisture             | % H <sub>2</sub> O                | 44.9       | 28.5       | 42.4       |
| Dry Mole Fraction               | Mfd                               | 0.710      | 0.701      | 0.704      |
| Fuel Factor                     | Fo                                | 0.978      | 0.975      | 0.975      |
| Gas Molecular Weight, Dry       | Md                                | 29.38      | 29.32      | 29.32      |
| Gas Molecular Weight, Wet       | Ms                                | 26.08      | 25.94      | 25.96      |
| Gas Velocity                    | vs - ft./sec.                     | 34.58      | 35.02      | 34.97      |
| Volumetric Air Flow, Actual     | Qaw - ACFM                        | 24,998     | 25,318     | 25,278     |
| Volumetric Air Flow, Standard   | Qsd - DSCFM                       | 14,745     | 15,224     | 14,842     |

**Method 1 - Air Control Techniques, P.C.**

Date

10/10/2013

|                                                   |                     |
|---------------------------------------------------|---------------------|
| Client                                            | Enviva              |
| Job #                                             | 1911                |
| Plant Name                                        | Wiggins             |
| State                                             | Mississippi         |
| City                                              | Wiggins             |
| Sampling Location                                 | Dryer 1             |
| No. of Ports Available                            | 2                   |
| No. of Ports Used                                 | 1                   |
| Port Inside Diameter, Inches                      | 4                   |
| Distance From Far Wall To Outside Of Port, Inches | 46                  |
| Nipple Length And/Or Wall Thickness, Inches       | 2                   |
| Depth Of Stack Or Duct, Inches                    | 44                  |
| Stack Or Duct Width (if rectangular), Inches      |                     |
| Equiv. Diameter = 2DW/(D+W), Inches               | 44                  |
| Stack/Duct Area, Square Feet                      | 10.6                |
| $(\square \times R^2 \text{ or } L \times W)$     |                     |
|                                                   | Upstream Downstream |
| Distance to Flow Disturbances, Inches             | 290.4 235.2         |
| Diameters                                         | 6.60 5.35           |

2 diff nipples probe marked to inside of port

| Point Location Data |                 |                           |                               |
|---------------------|-----------------|---------------------------|-------------------------------|
| Point               | % of Duct Depth | Distance From Inside Wall | Distance From Outside of Port |
| 1                   | 4.4             | 1 7/8                     | 3 7/8                         |
| 2                   | 14.6            | 6 3/8                     | 8 3/8                         |
| 3                   | 29.6            | 13                        | 15                            |
| 4                   | 70.4            | 31                        | 33                            |
| 5                   | 85.4            | 37 5/8                    | 39 5/8                        |
| 6                   | 95.6            | 42 1/8                    | 44 1/8                        |
| 7                   |                 |                           |                               |
| 8                   |                 |                           |                               |
| 9                   |                 |                           |                               |
| 10                  |                 |                           |                               |
| 11                  |                 |                           |                               |
| 12                  |                 |                           |                               |
| 13                  |                 |                           |                               |
| 14                  |                 |                           |                               |
| 15                  |                 |                           |                               |
| 16                  |                 |                           |                               |
| 17                  |                 |                           |                               |
| 18                  |                 |                           |                               |
| 19                  |                 |                           |                               |
| 20                  |                 |                           |                               |
| 21                  |                 |                           |                               |
| 22                  |                 |                           |                               |
| 23                  |                 |                           |                               |
| 24                  |                 |                           |                               |
| 25                  |                 |                           |                               |

| Note: If more than 8 and 2 diameters and if duct dia. is less than 24" use 8 or 9 points. |           |      |             |
|-------------------------------------------------------------------------------------------|-----------|------|-------------|
| Velocity                                                                                  | Diameters |      | Particulate |
|                                                                                           | UP        | Down |             |
| 12                                                                                        | 8         | 2    | 12          |
| 12                                                                                        | 7         | 1.75 | 12          |
| 12                                                                                        | 6         | 1.5  | 16          |
| 16                                                                                        | 5         | 1.25 | 20          |
| 16                                                                                        | 2         | 0.5  | 24 or 25    |

| Location of Points in Circular Stacks or Ducts |      |      |      |      |      |      |      |      |      |      |      |
|------------------------------------------------|------|------|------|------|------|------|------|------|------|------|------|
|                                                | 4    | 6    | 8    | 10   | 12   | 14   | 16   | 18   | 20   | 22   | 24   |
| 1                                              | 6.7  | 4.4  | 3.2  | 2.6  | 2.1  | 1.8  | 1.6  | 1.4  | 1.3  | 1.1  | 1.1  |
| 2                                              | 25.0 | 14.6 | 10.6 | 8.2  | 6.7  | 5.7  | 4.9  | 4.4  | 3.9  | 3.5  | 3.2  |
| 3                                              | 75.0 | 29.6 | 19.4 | 14.6 | 11.8 | 9.9  | 8.5  | 7.5  | 6.7  | 6.0  | 5.5  |
| 4                                              | 93.3 | 70.4 | 32.3 | 22.6 | 17.7 | 14.6 | 12.5 | 10.9 | 9.7  | 8.7  | 7.9  |
| 5                                              |      | 85.4 | 67.7 | 34.2 | 25.0 | 20.1 | 16.9 | 14.6 | 12.9 | 11.6 | 10.5 |
| 6                                              |      | 95.6 | 80.6 | 65.8 | 35.6 | 26.9 | 22.0 | 18.8 | 16.5 | 14.6 | 13.2 |
| 7                                              |      |      | 89.5 | 77.4 | 64.4 | 36.6 | 28.3 | 23.6 | 20.4 | 18.0 | 16.1 |
| 8                                              |      |      | 96.8 | 85.4 | 75.0 | 63.4 | 37.5 | 29.6 | 25.0 | 21.8 | 19.4 |
| 9                                              |      |      |      | 91.8 | 82.3 | 73.1 | 62.5 | 38.2 | 30.6 | 26.2 | 23.0 |
| 10                                             |      |      |      | 97.4 | 88.2 | 79.9 | 71.7 | 61.8 | 38.8 | 31.5 | 27.2 |
| 11                                             |      |      |      |      | 93.3 | 85.4 | 78.0 | 70.4 | 61.2 | 39.3 | 32.3 |
| 12                                             |      |      |      |      | 97.9 | 90.1 | 83.1 | 76.4 | 69.4 | 60.7 | 39.8 |
| 13                                             |      |      |      |      |      | 94.3 | 87.6 | 81.2 | 75.0 | 68.5 | 60.2 |
| 14                                             |      |      |      |      |      | 98.2 | 91.5 | 85.4 | 79.6 | 73.8 | 67.7 |
| 15                                             |      |      |      |      |      |      | 95.1 | 89.1 | 83.5 | 78.2 | 72.8 |
| 16                                             |      |      |      |      |      |      | 98.4 | 92.5 | 87.1 | 82.0 | 77.0 |
| 17                                             |      |      |      |      |      |      |      | 95.6 | 90.3 | 85.4 | 80.6 |
| 18                                             |      |      |      |      |      |      |      | 98.6 | 93.3 | 88.4 | 83.9 |
| 19                                             |      |      |      |      |      |      |      |      | 96.1 | 91.3 | 86.8 |
| 20                                             |      |      |      |      |      |      |      |      | 98.7 | 94.0 | 89.5 |
| 21                                             |      |      |      |      |      |      |      |      |      | 96.5 | 92.1 |
| 22                                             |      |      |      |      |      |      |      |      |      | 98.9 | 94.5 |
| 23                                             |      |      |      |      |      |      |      |      |      |      | 96.8 |
| 24                                             |      |      |      |      |      |      |      |      |      |      | 98.9 |

| Location of Points in Rectangular Stacks or Ducts |    |      |      |      |      |      |      |      |      |      |      |
|---------------------------------------------------|----|------|------|------|------|------|------|------|------|------|------|
|                                                   | 2  | 3    | 4    | 5    | 6    | 7    | 8    | 9    | 10   | 11   | 12   |
| 1                                                 | 25 | 16.7 | 12.5 | 10.0 | 8.3  | 7.1  | 6.3  | 5.6  | 5.0  | 4.5  | 4.2  |
| 2                                                 | 75 | 50   | 37.5 | 30.0 | 25   | 21.4 | 18.8 | 16.7 | 15.0 | 13.6 | 12.5 |
| 3                                                 |    | 83.3 | 62.5 | 50.0 | 41.7 | 35.7 | 31.3 | 27.8 | 25.0 | 22.7 | 20.8 |
| 4                                                 |    |      | 87.5 | 70.0 | 58.3 | 50   | 43.8 | 28.9 | 35.0 | 31.8 | 29.2 |
| 5                                                 |    |      |      | 90.0 | 75   | 64.3 | 56.3 | 50   | 45.0 | 40.9 | 37.5 |
| 6                                                 |    |      |      |      | 91.7 | 78.6 | 68.8 | 61.1 | 55.0 | 50   | 45.8 |
| 7                                                 |    |      |      |      |      | 92.9 | 81.3 | 72.2 | 65.0 | 59.1 | 54.2 |
| 8                                                 |    |      |      |      |      |      | 93.8 | 83.3 | 75.0 | 68.2 | 62.5 |
| 9                                                 |    |      |      |      |      |      |      | 94.4 | 85.0 | 77.3 | 70.8 |
| 10                                                |    |      |      |      |      |      |      |      | 95.0 | 86.4 | 79.2 |
| 11                                                |    |      |      |      |      |      |      |      |      | 95.5 | 87.5 |
| 12                                                |    |      |      |      |      |      |      |      |      |      | 95.8 |

0.0000 - 0.0625 - 0    0.5625 - 0.6875 - 5/8  
0.0625 - 0.1875 - 1/8    0.6875 - 0.8125 - 3/4  
0.1875 - 0.3125 - 1/4    0.8125 - 0.9375 - 7/8  
0.3125 - 0.4375 - 3/8    0.9375 - 1.0000 - 1  
0.4375 - 0.5625 - 1/2

Dryer 1 Run 1

|                                                |                 |              |              |                                        |         |             |  |
|------------------------------------------------|-----------------|--------------|--------------|----------------------------------------|---------|-------------|--|
| Air Control Techniques EPA Method 2 Data Sheet |                 |              |              | ACT Job Number                         |         | 1911        |  |
| Client                                         | Enviva          |              |              | ACT Run Number                         |         | 4           |  |
| Plant                                          | Wiggins         |              |              | Date                                   |         | 10/10/2013  |  |
| City/State                                     | Wiggins, MS     |              |              | Gauge ID                               |         | 909033      |  |
| Location                                       | Dryer 1         |              |              | Pitot ID                               |         | 6Pext       |  |
| <b>Averages</b>                                |                 | <b>1.283</b> | <b>146.3</b> | Thermocouple ID                        |         | TC25        |  |
|                                                | <b>Delta P</b>  | <b>Temp</b>  |              |                                        |         |             |  |
| <b>Point No.</b>                               | <b>In Water</b> | <b>Deg F</b> | <b>Angle</b> |                                        |         |             |  |
| A-1                                            | 1.200           | 144          | 7            | Oxygen %                               |         | 19          |  |
| 2                                              | 1.100           | 145          | 2            |                                        |         |             |  |
| 3                                              | 1.050           | 145          | 4            | Carbon Dioxide %                       |         | 2           |  |
| 4                                              | 1.400           | 146          | -3           |                                        |         |             |  |
| B-1                                            | 1.400           | 147          | 0            | Moisture %                             |         | 16.07       |  |
| 2                                              | 1.500           | 147          | -4           |                                        |         |             |  |
| B-1                                            | 1.100           | 147          | 6            | Stack Area sq.in.                      |         | 1520.530867 |  |
| 2                                              | 1.300           | 147          | 3            |                                        |         |             |  |
| 3                                              | 1.200           | 147          | 2            | Pbar                                   |         | 29.90       |  |
| 4                                              | 1.300           | 147          | 0            |                                        |         |             |  |
| 5                                              | 1.300           | 147          | -4           | Static Pressure                        |         | -0.75       |  |
| 6                                              | 1.600           | 147          | -3           |                                        |         |             |  |
| 0                                              |                 |              |              | Pitot Coef.                            |         | 0.84        |  |
| 0                                              |                 |              |              |                                        |         |             |  |
| 0                                              |                 |              |              | Start Time                             |         | 1732        |  |
| 0                                              |                 |              |              |                                        |         |             |  |
| 0                                              |                 |              |              | Stop Time                              |         | 1738        |  |
| 0                                              |                 |              |              |                                        |         |             |  |
| 0                                              |                 |              |              | Absolute Gas Pressure inches water     | Ps =    | 29.84       |  |
| 0                                              |                 |              |              |                                        |         |             |  |
| 0                                              |                 |              |              | Dry Mole Fraction of Gas               | Mfd =   | 0.83929     |  |
| 0                                              |                 |              |              |                                        |         |             |  |
| 0                                              |                 |              |              | Dry Molecular Weight of Gas lb/lb Mole | Md =    | 29.08       |  |
| 0                                              |                 |              |              |                                        |         |             |  |
| 0                                              |                 |              |              | Wet Molecular Weight of Gas lb/lb Mole | Ms =    | 27.30       |  |
| 0                                              |                 |              |              |                                        |         |             |  |
| 0                                              |                 |              |              | Average Gas Velocity ft/sec            | vs =    | 70.16       |  |
| 0                                              |                 |              |              |                                        |         |             |  |
| 0                                              |                 |              |              | Dry Volumetric Gas Flow Rate           |         |             |  |
| 0                                              |                 |              |              | at Standard Conditions SCFM            | Qsd =   | 32404       |  |
| 0                                              |                 |              |              |                                        |         |             |  |
| 0                                              |                 |              |              | Wet Volumetric Flue Gas Flow Rate      |         |             |  |
| 0                                              |                 |              |              | at Stack Conditions ACFM               | Qaw =   | 44448       |  |
| 0                                              |                 |              |              |                                        |         |             |  |
| 0                                              |                 |              |              | Wet Volumetric Gas Flow Rate           |         |             |  |
| 0                                              |                 |              |              | at Standard Conditions WSCFH           | WSCFH = | 2316527     |  |
| 0                                              |                 |              |              |                                        |         |             |  |
| 0                                              |                 |              |              | LKCH                                   |         |             |  |
| 0                                              |                 |              |              | Pre                                    | 3-6     | good        |  |
| 8                                              |                 |              |              | Post                                   | 5-4     | good        |  |
| 0                                              |                 |              |              |                                        |         |             |  |
| 0                                              |                 |              |              |                                        |         |             |  |

### Dryer 1 Run 2

|                                                |             |       |  |                                        |  |             |         |
|------------------------------------------------|-------------|-------|--|----------------------------------------|--|-------------|---------|
| Air Control Techniques EPA Method 2 Data Sheet |             |       |  | ACT Job Number                         |  | 1911        |         |
| Client                                         | Enviva      |       |  | ACT Run Number                         |  | 5           |         |
| Plant                                          | Wiggins     |       |  | Date                                   |  | 10/11/2013  |         |
| City/State                                     | Wiggins, MS |       |  | Gauge ID                               |  | 909033      |         |
| Location                                       | Dryer 1     |       |  | Pitot ID                               |  | 6Pext       |         |
| Averages                                       | 1.172       | 150.1 |  | Thermocouple ID                        |  | TC25        |         |
|                                                | Delta P     | Temp  |  |                                        |  |             |         |
| Point No.                                      | In Water    | Deg F |  |                                        |  |             |         |
| A-1                                            | 0.900       | 145   |  | Oxygen %                               |  | 17          |         |
| 2                                              | 0.990       | 147   |  |                                        |  |             |         |
| 3                                              | 1.000       | 148   |  | Carbon Dioxide %                       |  | 4           |         |
| 4                                              | 1.400       | 150   |  |                                        |  |             |         |
| B-1                                            | 1.400       | 151   |  | Moisture %                             |  | 12.79       |         |
| 2                                              | 0.820       | 150   |  |                                        |  |             |         |
| B-1                                            | 1.200       | 151   |  | Stack Area sq.in.                      |  | 1520.530867 |         |
| 2                                              | 1.300       | 151   |  |                                        |  |             |         |
| 3                                              | 1.300       | 152   |  | Pbar                                   |  | 29.80       |         |
| 4                                              | 1.300       | 152   |  |                                        |  |             |         |
| 5                                              | 1.350       | 152   |  | Static Pressure                        |  | -0.71       |         |
| 6                                              | 1.200       | 152   |  |                                        |  |             |         |
| 0                                              |             |       |  | Pitot Coef.                            |  | 0.84        |         |
| 0                                              |             |       |  |                                        |  |             |         |
| 0                                              |             |       |  | Start Time                             |  | 840         |         |
| 0                                              |             |       |  |                                        |  |             |         |
| 0                                              |             |       |  | Stop Time                              |  | 850         |         |
| 0                                              |             |       |  |                                        |  |             |         |
| 0                                              |             |       |  | Absolute Gas Pressure inches water     |  | Ps =        | 29.75   |
| 0                                              |             |       |  |                                        |  |             |         |
| 0                                              |             |       |  | Dry Mole Fraction of Gas               |  | Mfd =       | 0.87209 |
| 0                                              |             |       |  |                                        |  |             |         |
| 0                                              |             |       |  | Dry Molecular Weight of Gas lb/lb Mole |  | Md =        | 29.32   |
| 0                                              |             |       |  |                                        |  |             |         |
| 0                                              |             |       |  | Wet Molecular Weight of Gas lb/lb Mole |  | Ms =        | 27.87   |
| 0                                              |             |       |  |                                        |  |             |         |
| 0                                              |             |       |  | Average Gas Velocity ft/sec            |  | vs =        | 66.68   |
| 0                                              |             |       |  |                                        |  |             |         |
| 0                                              |             |       |  | Dry Volumetric Gas Flow Rate           |  |             |         |
| 0                                              |             |       |  | at Standard Conditions SCFM            |  | Qsd =       | 31700   |
| 0                                              |             |       |  |                                        |  |             |         |
| 0                                              |             |       |  | Wet Volumetric Flue Gas Flow Rate      |  |             |         |
| 0                                              |             |       |  | at Stack Conditions ACFM               |  | Qaw =       | 42243   |
| 0                                              |             |       |  |                                        |  |             |         |
| 0                                              |             |       |  | Wet Volumetric Gas Flow Rate           |  |             |         |
| 0                                              |             |       |  | at Standard Conditions WSCFH           |  | WSCFH =     | 2180938 |
| 0                                              |             |       |  |                                        |  |             |         |
| 0                                              |             |       |  | LKCH                                   |  |             |         |
| 0                                              |             |       |  | Pre                                    |  | 3-4         | good    |
| 8                                              |             |       |  | Post                                   |  | 5-3         | good    |
| 0                                              |             |       |  |                                        |  |             |         |
| 0                                              |             |       |  |                                        |  |             |         |

### Dryer 1 Run 3

|                                                |                 |              |  |                                               |  |                    |                |
|------------------------------------------------|-----------------|--------------|--|-----------------------------------------------|--|--------------------|----------------|
| Air Control Techniques EPA Method 2 Data Sheet |                 |              |  | ACT Job Number                                |  | 1911               |                |
| Client                                         | Enviva          |              |  | ACT Run Number                                |  | 6                  |                |
| Plant                                          | Wiggins         |              |  | Date                                          |  | 10/11/2013         |                |
| City/State                                     | Wiggins, MS     |              |  | Gauge ID                                      |  | 909033             |                |
| Location                                       | Dryer 1         |              |  | Pitot ID                                      |  | 6Pext              |                |
| <b>Averages</b>                                | <b>1.185</b>    | <b>147.3</b> |  | Thermocouple ID                               |  | TC25               |                |
|                                                | <b>Delta P</b>  | <b>Temp</b>  |  |                                               |  |                    |                |
| <b>Point No.</b>                               | <b>In Water</b> | <b>Deg F</b> |  |                                               |  |                    |                |
| <b>A-1</b>                                     | 1.050           | 148          |  | <b>Oxygen %</b>                               |  | <b>17</b>          |                |
| <b>2</b>                                       | 1.050           | 147          |  |                                               |  |                    |                |
| <b>3</b>                                       | 1.050           | 146          |  | <b>Carbon Dioxide %</b>                       |  | <b>4</b>           |                |
| <b>4</b>                                       | 1.500           | 147          |  |                                               |  |                    |                |
| <b>B-1</b>                                     | 1.500           | 147          |  | <b>Moisture %</b>                             |  | <b>15.23</b>       |                |
| <b>2</b>                                       | 0.940           | 147          |  |                                               |  |                    |                |
| <b>B-1</b>                                     | 1.100           | 147          |  | <b>Stack Area sq.in.</b>                      |  | <b>1520.530867</b> |                |
| <b>2</b>                                       | 1.200           | 147          |  |                                               |  |                    |                |
| <b>3</b>                                       | 1.200           | 147          |  | <b>Pbar</b>                                   |  | <b>29.80</b>       |                |
| <b>4</b>                                       | 1.300           | 148          |  |                                               |  |                    |                |
| <b>5</b>                                       | 1.300           | 148          |  | <b>Static Pressure</b>                        |  | <b>-0.71</b>       |                |
| <b>6</b>                                       | 1.100           | 148          |  |                                               |  |                    |                |
| <b>0</b>                                       |                 |              |  | <b>Pitot Coef.</b>                            |  | <b>0.84</b>        |                |
| <b>0</b>                                       |                 |              |  |                                               |  |                    |                |
| <b>0</b>                                       |                 |              |  | <b>Start Time</b>                             |  | <b>1112</b>        |                |
| <b>0</b>                                       |                 |              |  |                                               |  |                    |                |
| <b>0</b>                                       |                 |              |  | <b>Stop Time</b>                              |  | <b>1115</b>        |                |
| <b>0</b>                                       |                 |              |  |                                               |  |                    |                |
| <b>0</b>                                       |                 |              |  | <b>Absolute Gas Pressure inches water</b>     |  | <b>Ps =</b>        | <b>29.75</b>   |
| <b>0</b>                                       |                 |              |  |                                               |  |                    |                |
| <b>0</b>                                       |                 |              |  | <b>Dry Mole Fraction of Gas</b>               |  | <b>Mfd =</b>       | <b>0.84774</b> |
| <b>0</b>                                       |                 |              |  |                                               |  |                    |                |
| <b>0</b>                                       |                 |              |  | <b>Dry Molecular Weight of Gas lb/lb Mole</b> |  | <b>Md =</b>        | <b>29.32</b>   |
| <b>0</b>                                       |                 |              |  |                                               |  |                    |                |
| <b>0</b>                                       |                 |              |  | <b>Wet Molecular Weight of Gas lb/lb Mole</b> |  | <b>Ms =</b>        | <b>27.60</b>   |
| <b>0</b>                                       |                 |              |  |                                               |  |                    |                |
| <b>0</b>                                       |                 |              |  | <b>Average Gas Velocity ft/sec</b>            |  | <b>vs =</b>        | <b>67.23</b>   |
| <b>0</b>                                       |                 |              |  |                                               |  |                    |                |
| <b>0</b>                                       |                 |              |  | <b>Dry Volumetric Gas Flow Rate</b>           |  |                    |                |
| <b>0</b>                                       |                 |              |  | <b>at Standard Conditions SCFM</b>            |  | <b>Qsd =</b>       | <b>31215</b>   |
| <b>0</b>                                       |                 |              |  |                                               |  |                    |                |
| <b>0</b>                                       |                 |              |  | <b>Wet Volumetric Flue Gas Flow Rate</b>      |  |                    |                |
| <b>0</b>                                       |                 |              |  | <b>at Stack Conditions ACFM</b>               |  | <b>Qaw =</b>       | <b>42593</b>   |
| <b>0</b>                                       |                 |              |  |                                               |  |                    |                |
| <b>0</b>                                       |                 |              |  | <b>Wet Volumetric Gas Flow Rate</b>           |  |                    |                |
| <b>0</b>                                       |                 |              |  | <b>at Standard Conditions WSCFH</b>           |  | <b>WSCFH =</b>     | <b>2209261</b> |
| <b>0</b>                                       |                 |              |  |                                               |  |                    |                |
| <b>0</b>                                       |                 |              |  | <b>LKCH</b>                                   |  |                    |                |
| <b>0</b>                                       |                 |              |  | <b>Pre</b>                                    |  | <b>3-4</b>         | <b>good</b>    |
| <b>8</b>                                       |                 |              |  | <b>Post</b>                                   |  | <b>5-3</b>         | <b>good</b>    |
| <b>0</b>                                       |                 |              |  |                                               |  |                    |                |
| <b>0</b>                                       |                 |              |  |                                               |  |                    |                |

**Method 1 - Air Control Techniques, P.C.**

Date

10/13/2013

Client Enviva  
Job # 1911  
Plant Name Wiggins  
State Mississippi  
City Wiggins  
Sampling Location Dryer 2

No. of Ports Available 2  
No. of Ports Used 1  
Port Inside Diameter, Inches 4  
Distance From Far Wall To Outside Of Port, Inches 55.5  
Nipple Length And/Or Wall Thickness, Inches 8.5  
Depth Of Stack Or Duct, Inches 47  
Stack Or Duct Width (if rectangular), Inches  
Equiv. Diameter = 2DW/(D+W), Inches 47  
Stack/Duct Area, Square Feet 12.05  
(□ x R<sup>2</sup> or L x W)

|                                       | Upstream | Downstream |
|---------------------------------------|----------|------------|
| Distance to Flow Disturbances, Inches | 325.2    | 674.4      |
| Diameters                             | 6.92     | 14.35      |

2 diff nipples probe marked to inside of port

**Point Location Data**

| Point | % of Duct<br>Depth | Distance From<br>Inside Wall | Distance From<br>Outside of Port |
|-------|--------------------|------------------------------|----------------------------------|
| 1     | 4.4                | 2 1/8                        | 10 5/8                           |
| 2     | 14.6               | 6 7/8                        | 15 3/8                           |
| 3     | 29.6               | 13 7/8                       | 22 3/8                           |
| 4     | 70.4               | 33 1/8                       | 41 5/8                           |
| 5     | 85.4               | 40 1/8                       | 48 5/8                           |
| 6     | 95.6               | 44 7/8                       | 53 3/8                           |
| 7     |                    |                              |                                  |
| 8     |                    |                              |                                  |
| 9     |                    |                              |                                  |
| 10    |                    |                              |                                  |
| 11    |                    |                              |                                  |
| 12    |                    |                              |                                  |
| 13    |                    |                              |                                  |
| 14    |                    |                              |                                  |
| 15    |                    |                              |                                  |
| 16    |                    |                              |                                  |
| 17    |                    |                              |                                  |
| 18    |                    |                              |                                  |
| 19    |                    |                              |                                  |
| 20    |                    |                              |                                  |
| 21    |                    |                              |                                  |
| 22    |                    |                              |                                  |
| 23    |                    |                              |                                  |
| 24    |                    |                              |                                  |
| 25    |                    |                              |                                  |

Note: If more than 8 and 2 diameters and if duct dia.  
is less than 24" use 8 or 9 points.

| Velocity | UP |  | Down | Particulate |
|----------|----|--|------|-------------|
| 12       | 8  |  | 2    | 12          |
| 12       | 7  |  | 1.75 | 12          |
| 12       | 6  |  | 1.5  | 16          |
| 16       | 5  |  | 1.25 | 20          |
| 16       | 2  |  | 0.5  | 24 or 25    |

**Location of Points in Circular Stacks or Ducts**

|    | 4    | 6    | 8    | 10   | 12   | 14   | 16   | 18   | 20   | 22   | 24   |
|----|------|------|------|------|------|------|------|------|------|------|------|
| 1  | 6.7  | 4.4  | 3.2  | 2.6  | 2.1  | 1.8  | 1.6  | 1.4  | 1.3  | 1.1  | 1.1  |
| 2  | 25.0 | 14.6 | 10.6 | 8.2  | 6.7  | 5.7  | 4.9  | 4.4  | 3.9  | 3.5  | 3.2  |
| 3  | 75.0 | 29.6 | 19.4 | 14.6 | 11.8 | 9.9  | 8.5  | 7.5  | 6.7  | 6.0  | 5.5  |
| 4  | 93.3 | 70.4 | 32.3 | 22.6 | 17.7 | 14.6 | 12.5 | 10.9 | 9.7  | 8.7  | 7.9  |
| 5  |      | 85.4 | 67.7 | 34.2 | 25.0 | 20.1 | 16.9 | 14.6 | 12.9 | 11.6 | 10.5 |
| 6  |      | 95.6 | 80.6 | 65.8 | 35.6 | 26.9 | 22.0 | 18.8 | 16.5 | 14.6 | 13.2 |
| 7  |      |      | 89.5 | 77.4 | 64.4 | 36.6 | 28.3 | 23.6 | 20.4 | 18.0 | 16.1 |
| 8  |      |      | 96.8 | 85.4 | 75.0 | 63.4 | 37.5 | 29.6 | 25.0 | 21.8 | 19.4 |
| 9  |      |      |      | 91.8 | 82.3 | 73.1 | 62.5 | 38.2 | 30.6 | 26.2 | 23.0 |
| 10 |      |      |      | 97.4 | 88.2 | 79.9 | 71.7 | 61.8 | 38.8 | 31.5 | 27.2 |
| 11 |      |      |      |      | 93.3 | 85.4 | 78.0 | 70.4 | 61.2 | 39.3 | 32.3 |
| 12 |      |      |      |      | 97.9 | 90.1 | 83.1 | 76.4 | 69.4 | 60.7 | 39.8 |
| 13 |      |      |      |      |      | 94.3 | 87.6 | 81.2 | 75.0 | 68.5 | 60.2 |
| 14 |      |      |      |      |      | 98.2 | 91.5 | 85.4 | 79.6 | 73.8 | 67.7 |
| 15 |      |      |      |      |      |      | 95.1 | 89.1 | 83.5 | 78.2 | 72.8 |
| 16 |      |      |      |      |      |      | 98.4 | 92.5 | 87.1 | 82.0 | 77.0 |
| 17 |      |      |      |      |      |      |      | 95.6 | 90.3 | 85.4 | 80.6 |
| 18 |      |      |      |      |      |      |      | 98.6 | 93.3 | 88.4 | 83.9 |
| 19 |      |      |      |      |      |      |      |      | 96.1 | 91.3 | 86.8 |
| 20 |      |      |      |      |      |      |      |      | 98.7 | 94.0 | 89.5 |
| 21 |      |      |      |      |      |      |      |      |      | 96.5 | 92.1 |
| 22 |      |      |      |      |      |      |      |      |      | 98.9 | 94.5 |
| 23 |      |      |      |      |      |      |      |      |      |      | 96.8 |
| 24 |      |      |      |      |      |      |      |      |      |      | 96.9 |

**Location of Points in Rectangular Stacks or Ducts**

|    | 2  | 3    | 4    | 5    | 6    | 7    | 8    | 9    | 10   | 11   | 12   |
|----|----|------|------|------|------|------|------|------|------|------|------|
| 1  | 25 | 16.7 | 12.5 | 10.0 | 8.3  | 7.1  | 6.3  | 5.6  | 5.0  | 4.5  | 4.2  |
| 2  | 75 | 50   | 37.5 | 30.0 | 25   | 21.4 | 18.8 | 16.7 | 15.0 | 13.6 | 12.5 |
| 3  |    | 83.3 | 62.5 | 50.0 | 41.7 | 35.7 | 31.3 | 27.8 | 25.0 | 22.7 | 20.8 |
| 4  |    |      | 87.5 | 70.0 | 58.3 | 50   | 43.8 | 28.9 | 35.0 | 31.8 | 29.2 |
| 5  |    |      |      | 90.0 | 75   | 64.3 | 56.3 | 50   | 45.0 | 40.9 | 37.5 |
| 6  |    |      |      |      | 91.7 | 78.6 | 68.8 | 61.1 | 55.0 | 50   | 45.8 |
| 7  |    |      |      |      |      | 92.9 | 81.3 | 72.2 | 65.0 | 59.1 | 54.2 |
| 8  |    |      |      |      |      |      | 93.8 | 83.3 | 75.0 | 68.2 | 62.5 |
| 9  |    |      |      |      |      |      |      | 94.4 | 85.0 | 77.3 | 70.8 |
| 10 |    |      |      |      |      |      |      |      | 95.0 | 86.4 | 79.2 |
| 11 |    |      |      |      |      |      |      |      |      | 95.5 | 87.5 |
| 12 |    |      |      |      |      |      |      |      |      |      | 96.8 |

0.0000 - 0.0625 - 0    0.5625 - 0.6875 - 5/8  
0.0625 - 0.1875 - 1/8    0.6875 - 0.8125 - 3/4  
0.1875 - 0.3125 - 1/4    0.8125 - 0.9375 - 7/8  
0.3125 - 0.4375 - 3/8    0.9375 - 1.0000 - 1  
0.4375 - 0.5625 - 1/2



Dryer 2 Run 1

|                                                |                 |              |              |                                        |         |            |  |
|------------------------------------------------|-----------------|--------------|--------------|----------------------------------------|---------|------------|--|
| Air Control Techniques EPA Method 2 Data Sheet |                 |              |              | ACT Job Number                         |         | 1911       |  |
| Client                                         | Enviva          |              |              | ACT Run Number                         |         | 19         |  |
| Plant                                          | Wiggins         |              |              | Date                                   |         | 10/13/2013 |  |
| City/State                                     | Wiggins, MS     |              |              | Gauge ID                               |         | 909033     |  |
| Location                                       | Dryer 2         |              |              | Pitot ID                               |         | 6Pext      |  |
| <b>Averages</b>                                |                 | <b>0.285</b> | <b>174.3</b> | Thermocouple ID                        |         | TC25       |  |
|                                                | <b>Delta P</b>  | <b>Temp</b>  |              |                                        |         |            |  |
| <b>Point No.</b>                               | <b>In Water</b> | <b>Deg F</b> | <b>Angle</b> |                                        |         |            |  |
| A-1                                            | 0.200           | 168          | 5            | Oxygen %                               |         | 16.5       |  |
| 2                                              | 0.280           | 173          | 2            |                                        |         |            |  |
| 3                                              | 0.330           | 175          | 0            | Carbon Dioxide %                       |         | 4.5        |  |
| 4                                              | 0.330           | 175          | 5            |                                        |         |            |  |
| 5                                              | 0.300           | 174          | 0            | Moisture %                             |         | 29.04      |  |
| 6                                              | 0.230           | 170          | 0            |                                        |         |            |  |
| B-1                                            | 0.210           | 174          | 6            | Stack Area sq.in.                      |         | 1734.94    |  |
| 2                                              | 0.360           | 176          | 3            |                                        |         |            |  |
| 3                                              | 0.350           | 177          | 0            | Pbar                                   |         | 29.90      |  |
| 4                                              | 0.330           | 177          | 0            |                                        |         |            |  |
| 5                                              | 0.300           | 177          | -4           | Static Pressure                        |         | -0.33      |  |
| 6                                              | 0.230           | 175          | 4            |                                        |         |            |  |
| 0                                              |                 |              |              | Pitot Coef.                            |         | 0.84       |  |
| 0                                              |                 |              |              |                                        |         |            |  |
| 0                                              |                 |              |              | Start Time                             |         | 843        |  |
| 0                                              |                 |              |              |                                        |         |            |  |
| 0                                              |                 |              |              | Stop Time                              |         | 859        |  |
| 2                                              |                 |              |              |                                        |         |            |  |
| 3                                              |                 |              |              | Absolute Gas Pressure inches water     | Ps =    | 29.88      |  |
| 4                                              |                 |              |              |                                        |         |            |  |
| 5                                              |                 |              |              | Dry Mole Fraction of Gas               | Mfd =   | 0.70959    |  |
| 6                                              |                 |              |              |                                        |         |            |  |
| 7                                              |                 |              |              | Dry Molecular Weight of Gas lb/lb Mole | Md =    | 29.38      |  |
| 8                                              |                 |              |              |                                        |         |            |  |
| D-1                                            |                 |              |              | Wet Molecular Weight of Gas lb/lb Mole | Ms =    | 26.08      |  |
| 2                                              |                 |              |              |                                        |         |            |  |
| 3                                              |                 |              |              | Average Gas Velocity ft/sec            | vs =    | 34.58      |  |
| 4                                              |                 |              |              |                                        |         |            |  |
| 5                                              |                 |              |              | Dry Volumetric Gas Flow Rate           |         |            |  |
| 6                                              |                 |              |              | at Standard Conditions SCFM            | Qsd =   | 14745      |  |
| 7                                              |                 |              |              |                                        |         |            |  |
| 8                                              |                 |              |              | Wet Volumetric Flue Gas Flow Rate      |         |            |  |
| E-1                                            |                 |              |              | at Stack Conditions ACFM               | Qaw =   | 24998      |  |
| 2                                              |                 |              |              |                                        |         |            |  |
| 3                                              |                 |              |              | Wet Volumetric Gas Flow Rate           |         |            |  |
| 4                                              |                 |              |              | at Standard Conditions WSCFH           | WSCFH = | 1246788    |  |
| 5                                              |                 |              |              |                                        |         |            |  |
| 6                                              |                 |              |              | LKCH                                   |         |            |  |
| 7                                              |                 |              |              | Pre                                    | 6-5     | good       |  |
| 8                                              |                 |              |              | Post                                   | 5-3     | good       |  |
|                                                |                 |              |              |                                        |         |            |  |
|                                                |                 |              |              |                                        |         |            |  |

Dryer 2 Run 2

|                                                |                 |              |              |                                               |  |                |                |
|------------------------------------------------|-----------------|--------------|--------------|-----------------------------------------------|--|----------------|----------------|
| Air Control Techniques EPA Method 2 Data Sheet |                 |              |              | ACT Job Number                                |  | 1911           |                |
| Client                                         | Enviva          |              |              | ACT Run Number                                |  | 20             |                |
| Plant                                          | Wiggins         |              |              | Date                                          |  | 10/13/13       |                |
| City/State                                     | Wiggins, MS     |              |              | Gauge ID                                      |  | 909033         |                |
| Location                                       | Dryer 2         |              |              | Pitot ID                                      |  | 6Pext          |                |
| <b>Averages</b>                                |                 | <b>0.300</b> | <b>154.9</b> | Thermocouple ID                               |  | TC25           |                |
|                                                | <b>Delta P</b>  | <b>Temp</b>  |              |                                               |  |                |                |
| <b>Point No.</b>                               | <b>In Water</b> | <b>Deg F</b> |              |                                               |  |                |                |
| A-1                                            | 0.200           | 167          |              | <b>Oxygen %</b>                               |  | <b>17</b>      |                |
| 2                                              | 0.800           | 167          |              |                                               |  |                |                |
| 3                                              | 0.310           | 167          |              | <b>Carbon Dioxide %</b>                       |  | <b>4</b>       |                |
| 4                                              | 0.330           | 168          |              |                                               |  |                |                |
| 5                                              | 0.340           | 169          |              | <b>Moisture %</b>                             |  | <b>29.86</b>   |                |
| 6                                              | 0.200           | 167          |              |                                               |  |                |                |
| B-1                                            | 0.220           | 170          |              | <b>Stack Area sq.in.</b>                      |  | <b>1734.94</b> |                |
| 2                                              | 0.310           | 170          |              |                                               |  |                |                |
| 3                                              | 0.310           | 2            |              | <b>Pbar</b>                                   |  | <b>29.90</b>   |                |
| 4                                              | 0.290           | 170          |              |                                               |  |                |                |
| 5                                              | 0.260           | 171          |              | <b>Static Pressure</b>                        |  | <b>-0.33</b>   |                |
| 6                                              | 0.190           | 171          |              |                                               |  |                |                |
| 0                                              |                 |              |              | <b>Pitot Coef.</b>                            |  | <b>0.84</b>    |                |
| 0                                              |                 |              |              |                                               |  |                |                |
| 0                                              |                 |              |              | <b>Start Time</b>                             |  | <b>1047</b>    |                |
| 0                                              |                 |              |              |                                               |  |                |                |
| 0                                              |                 |              |              | <b>Stop Time</b>                              |  | <b>1051</b>    |                |
| 2                                              |                 |              |              |                                               |  |                |                |
| 3                                              |                 |              |              | <b>Absolute Gas Pressure inches water</b>     |  | <b>Ps =</b>    | <b>29.88</b>   |
| 4                                              |                 |              |              |                                               |  |                |                |
| 5                                              |                 |              |              | <b>Dry Mole Fraction of Gas</b>               |  | <b>Mfd =</b>   | <b>0.70135</b> |
| 6                                              |                 |              |              |                                               |  |                |                |
| 7                                              |                 |              |              | <b>Dry Molecular Weight of Gas lb/lb Mole</b> |  | <b>Md =</b>    | <b>29.32</b>   |
| 8                                              |                 |              |              |                                               |  |                |                |
| D-1                                            |                 |              |              | <b>Wet Molecular Weight of Gas lb/lb Mole</b> |  | <b>Ms =</b>    | <b>25.94</b>   |
| 2                                              |                 |              |              |                                               |  |                |                |
| 2                                              |                 |              |              | <b>Average Gas Velocity ft/sec</b>            |  | <b>vs =</b>    | <b>35.02</b>   |
| 4                                              |                 |              |              |                                               |  |                |                |
| 5                                              |                 |              |              | <b>Dry Volumetric Gas Flow Rate</b>           |  |                |                |
| 6                                              |                 |              |              | <b>at Standard Conditions SCFM</b>            |  | <b>Qsd =</b>   | <b>15224</b>   |
| 7                                              |                 |              |              |                                               |  |                |                |
| 8                                              |                 |              |              | <b>Wet Volumetric Flue Gas Flow Rate</b>      |  |                |                |
| E-1                                            |                 |              |              | <b>at Stack Conditions ACFM</b>               |  | <b>Qaw =</b>   | <b>25318</b>   |
| 2                                              |                 |              |              |                                               |  |                |                |
| 3                                              |                 |              |              | <b>Wet Volumetric Gas Flow Rate</b>           |  |                |                |
| 4                                              |                 |              |              | <b>at Standard Conditions WSCFH</b>           |  | <b>WSCFH =</b> | <b>1302430</b> |
| 5                                              |                 |              |              |                                               |  |                |                |
| 6                                              |                 |              |              | LKCH                                          |  |                |                |
| 7                                              |                 |              |              | Pre                                           |  | 6-5            | good           |
| 8                                              |                 |              |              | Post                                          |  | 5-3            | good           |
|                                                |                 |              |              |                                               |  |                |                |
|                                                |                 |              |              |                                               |  |                |                |

Dryer 2 Run 3

|                                                |                 |              |              |                                                                   |     |                |                |
|------------------------------------------------|-----------------|--------------|--------------|-------------------------------------------------------------------|-----|----------------|----------------|
| Air Control Techniques EPA Method 2 Data Sheet |                 |              |              | ACT Job Number                                                    |     | 1911           |                |
| Client                                         | Enviva          |              |              | ACT Run Number                                                    |     | 21             |                |
| Plant                                          | Wiggins         |              |              | Date                                                              |     | 10/13/13       |                |
| City/State                                     | Wiggins, MS     |              |              | Gauge ID                                                          |     | 909033         |                |
| Location                                       | Dryer 2         |              |              | Pitot ID                                                          |     | 6Pext          |                |
| <b>Averages</b>                                |                 | <b>0.291</b> | <b>171.8</b> | Thermocouple ID                                                   |     | TC25           |                |
|                                                | <b>Delta P</b>  | <b>Temp</b>  |              |                                                                   |     |                |                |
| <b>Point No.</b>                               | <b>In Water</b> | <b>Deg F</b> |              |                                                                   |     |                |                |
| A-1                                            | 0.220           | 169          |              | <b>Oxygen %</b>                                                   |     | <b>17</b>      |                |
| 2                                              | 0.250           | 172          |              | <b>Carbon Dioxide %</b>                                           |     | <b>4</b>       |                |
| 3                                              | 0.320           | 173          |              | <b>Moisture %</b>                                                 |     | <b>29.64</b>   |                |
| 4                                              | 0.320           | 174          |              | <b>Stack Area sq.in.</b>                                          |     | <b>1734.94</b> |                |
| 5                                              | 0.330           | 174          |              | <b>Pbar</b>                                                       |     | <b>29.90</b>   |                |
| 6                                              | 0.260           | 168          |              | <b>Static Pressure</b>                                            |     | <b>-0.33</b>   |                |
| B-1                                            | 0.240           | 168          |              | <b>Pitot Coef.</b>                                                |     | <b>0.84</b>    |                |
| 2                                              | 0.310           | 171          |              | <b>Start Time</b>                                                 |     | <b>1208</b>    |                |
| 3                                              | 0.340           | 172          |              | <b>Stop Time</b>                                                  |     | <b>1215</b>    |                |
| 4                                              | 0.330           | 172          |              |                                                                   |     |                |                |
| 5                                              | 0.310           | 173          |              |                                                                   |     |                |                |
| 6                                              | 0.280           | 175          |              |                                                                   |     |                |                |
| 0                                              |                 |              |              |                                                                   |     |                |                |
| 0                                              |                 |              |              |                                                                   |     |                |                |
| 0                                              |                 |              |              |                                                                   |     |                |                |
| 0                                              |                 |              |              |                                                                   |     |                |                |
| 0                                              |                 |              |              |                                                                   |     |                |                |
| 2                                              |                 |              |              |                                                                   |     |                |                |
| 3                                              |                 |              |              | <b>Absolute Gas Pressure inches water</b>                         |     | <b>Ps =</b>    | <b>29.88</b>   |
| 4                                              |                 |              |              | <b>Dry Mole Fraction of Gas</b>                                   |     | <b>Mfd =</b>   | <b>0.70356</b> |
| 5                                              |                 |              |              | <b>Dry Molecular Weight of Gas lb/lb Mole</b>                     |     | <b>Md =</b>    | <b>29.32</b>   |
| 6                                              |                 |              |              | <b>Wet Molecular Weight of Gas lb/lb Mole</b>                     |     | <b>Ms =</b>    | <b>25.96</b>   |
| 7                                              |                 |              |              | <b>Average Gas Velocity ft/sec</b>                                |     | <b>vs =</b>    | <b>34.97</b>   |
| 8                                              |                 |              |              | <b>Dry Volumetric Gas Flow Rate at Standard Conditions SCFM</b>   |     | <b>Qsd =</b>   | <b>14842</b>   |
| D-1                                            |                 |              |              | <b>Wet Volumetric Flue Gas Flow Rate at Stack Conditions ACFM</b> |     | <b>Qaw =</b>   | <b>25278</b>   |
| 2                                              |                 |              |              | <b>Wet Volumetric Gas Flow Rate at Standard Conditions WSCFH</b>  |     | <b>WSCFH =</b> | <b>1265741</b> |
| 3                                              |                 |              |              |                                                                   |     |                |                |
| 4                                              |                 |              |              |                                                                   |     |                |                |
| 5                                              |                 |              |              |                                                                   |     |                |                |
| 6                                              |                 |              |              | LKCH                                                              |     |                |                |
| 7                                              |                 |              |              | Pre                                                               | 3-4 | good           |                |
| 8                                              |                 |              |              | Post                                                              | 5-3 | good           |                |

**Method 1 - Air Control Techniques, P.C.**

Date

10/10/2013

|                                                   |                            |
|---------------------------------------------------|----------------------------|
| Client                                            | Enviva                     |
| Job #                                             | 1911                       |
| Plant Name                                        | Wiggins                    |
| State                                             | Mississippi                |
| City                                              | Wiggins                    |
| Sampling Location                                 | Green Hammermill           |
| No. of Ports Available                            | 2                          |
| No. of Ports Used                                 | 1                          |
| Port Inside Diameter, Inches                      | 3                          |
| Distance From Far Wall To Outside Of Port, Inches | 30                         |
| Nipple Length And/Or Wall Thickness, Inches       | 3                          |
| Depth Of Stack Or Duct, Inches                    | 27                         |
| Stack Or Duct Width (if rectangular), Inches      |                            |
| Equiv. Diameter = 2DW/(D+W), Inches               | 27                         |
| Stack/Duct Area, Square Feet                      | 3.9761                     |
| ( $\square \times R^2$ or L x W)                  |                            |
| Distance to Flow Disturbances, Inches             | Upstream 348 Downstream 60 |
| Diameters                                         | 12.89 2.22                 |

2 diff nipples probe marked to inside of port

| Point Location Data |                 |                           |                               |
|---------------------|-----------------|---------------------------|-------------------------------|
| Point               | % of Duct Depth | Distance From Inside Wall | Distance From Outside of Port |
| 1                   | 4.4             | 1 2/8                     | 4 2/8                         |
| 2                   | 14.6            | 4                         | 7                             |
| 3                   | 29.6            | 8                         | 11                            |
| 4                   | 70.4            | 19                        | 22                            |
| 5                   | 85.4            | 23                        | 26                            |
| 6                   | 95.6            | 25 6/8                    | 28 6/8                        |
| 7                   |                 |                           |                               |
| 8                   |                 |                           |                               |
| 9                   |                 |                           |                               |
| 10                  |                 |                           |                               |
| 11                  |                 |                           |                               |
| 12                  |                 |                           |                               |
| 13                  |                 |                           |                               |
| 14                  |                 |                           |                               |
| 15                  |                 |                           |                               |
| 16                  |                 |                           |                               |
| 17                  |                 |                           |                               |
| 18                  |                 |                           |                               |
| 19                  |                 |                           |                               |
| 20                  |                 |                           |                               |
| 21                  |                 |                           |                               |
| 22                  |                 |                           |                               |
| 23                  |                 |                           |                               |
| 24                  |                 |                           |                               |
| 25                  |                 |                           |                               |

| Note: If more than 8 and 2 diameters and if duct dia. is less than 24" use 8 or 9 points. |           |      |             |
|-------------------------------------------------------------------------------------------|-----------|------|-------------|
| Velocity                                                                                  | Diameters |      | Particulate |
|                                                                                           | UP        | Down |             |
| 12                                                                                        | 8         | 2    | 12          |
| 12                                                                                        | 7         | 1.75 | 12          |
| 12                                                                                        | 6         | 1.5  | 16          |
| 16                                                                                        | 5         | 1.25 | 20          |
| 16                                                                                        | 2         | 0.5  | 24 or 25    |

| Location of Points in Circular Stacks or Ducts |      |      |      |      |      |      |      |      |      |      |      |
|------------------------------------------------|------|------|------|------|------|------|------|------|------|------|------|
|                                                | 4    | 6    | 8    | 10   | 12   | 14   | 16   | 18   | 20   | 22   | 24   |
| 1                                              | 6.7  | 4.4  | 3.2  | 2.6  | 2.1  | 1.8  | 1.6  | 1.4  | 1.3  | 1.1  | 1.1  |
| 2                                              | 25.0 | 14.6 | 10.6 | 8.2  | 6.7  | 5.7  | 4.9  | 4.4  | 3.9  | 3.5  | 3.2  |
| 3                                              | 75.0 | 29.6 | 19.4 | 14.6 | 11.8 | 9.9  | 8.5  | 7.5  | 6.7  | 6.0  | 5.5  |
| 4                                              | 93.3 | 70.4 | 32.3 | 22.6 | 17.7 | 14.6 | 12.5 | 10.9 | 9.7  | 8.7  | 7.9  |
| 5                                              |      | 85.4 | 67.7 | 34.2 | 25.0 | 20.1 | 16.9 | 14.6 | 12.9 | 11.6 | 10.5 |
| 6                                              |      | 95.6 | 80.6 | 65.8 | 35.6 | 26.9 | 22.0 | 18.8 | 16.5 | 14.6 | 13.2 |
| 7                                              |      |      | 89.5 | 77.4 | 64.4 | 36.6 | 28.3 | 23.6 | 20.4 | 18.0 | 16.1 |
| 8                                              |      |      | 96.8 | 85.4 | 75.0 | 63.4 | 37.5 | 29.6 | 25.0 | 21.8 | 19.4 |
| 9                                              |      |      |      | 91.8 | 82.3 | 73.1 | 62.5 | 38.2 | 30.6 | 26.2 | 23.0 |
| 10                                             |      |      |      | 97.4 | 88.2 | 79.9 | 71.7 | 61.8 | 38.8 | 31.5 | 27.2 |
| 11                                             |      |      |      |      | 93.3 | 85.4 | 78.0 | 70.4 | 61.2 | 39.3 | 32.3 |
| 12                                             |      |      |      |      | 97.9 | 90.1 | 83.1 | 76.4 | 69.4 | 60.7 | 39.8 |
| 13                                             |      |      |      |      |      | 94.3 | 87.6 | 81.2 | 75.0 | 68.5 | 60.2 |
| 14                                             |      |      |      |      |      | 98.2 | 91.5 | 85.4 | 79.6 | 73.8 | 67.7 |
| 15                                             |      |      |      |      |      |      | 95.1 | 89.1 | 83.5 | 78.2 | 72.8 |
| 16                                             |      |      |      |      |      |      | 98.4 | 92.5 | 87.1 | 82.0 | 77.0 |
| 17                                             |      |      |      |      |      |      |      | 95.6 | 90.3 | 85.4 | 80.6 |
| 18                                             |      |      |      |      |      |      |      | 98.6 | 93.3 | 88.4 | 83.9 |
| 19                                             |      |      |      |      |      |      |      |      | 96.1 | 91.3 | 86.8 |
| 20                                             |      |      |      |      |      |      |      |      | 98.7 | 94.0 | 89.5 |
| 21                                             |      |      |      |      |      |      |      |      |      | 96.5 | 92.1 |
| 22                                             |      |      |      |      |      |      |      |      |      | 98.9 | 94.5 |
| 23                                             |      |      |      |      |      |      |      |      |      |      | 96.8 |
| 24                                             |      |      |      |      |      |      |      |      |      |      | 98.9 |

| Location of Points in Rectangular Stacks or Ducts |    |      |      |      |      |      |      |      |      |      |      |
|---------------------------------------------------|----|------|------|------|------|------|------|------|------|------|------|
|                                                   | 2  | 3    | 4    | 5    | 6    | 7    | 8    | 9    | 10   | 11   | 12   |
| 1                                                 | 25 | 16.7 | 12.5 | 10.0 | 8.3  | 7.1  | 6.3  | 5.6  | 5.0  | 4.5  | 4.2  |
| 2                                                 | 75 | 50   | 37.5 | 30.0 | 25   | 21.4 | 18.8 | 16.7 | 15.0 | 13.6 | 12.5 |
| 3                                                 |    | 83.3 | 62.5 | 50.0 | 41.7 | 35.7 | 31.3 | 27.8 | 25.0 | 22.7 | 20.8 |
| 4                                                 |    |      | 87.5 | 70.0 | 58.3 | 50   | 43.8 | 28.9 | 35.0 | 31.8 | 29.2 |
| 5                                                 |    |      |      | 90.0 | 75   | 64.3 | 56.3 | 50   | 45.0 | 40.9 | 37.5 |
| 6                                                 |    |      |      |      | 91.7 | 78.6 | 68.8 | 61.1 | 55.0 | 50   | 45.8 |
| 7                                                 |    |      |      |      |      | 92.9 | 81.3 | 72.2 | 65.0 | 59.1 | 54.2 |
| 8                                                 |    |      |      |      |      |      | 93.8 | 83.3 | 75.0 | 68.2 | 62.5 |
| 9                                                 |    |      |      |      |      |      |      | 94.4 | 85.0 | 77.3 | 70.8 |
| 10                                                |    |      |      |      |      |      |      |      | 95.0 | 86.4 | 79.2 |
| 11                                                |    |      |      |      |      |      |      |      |      | 95.5 | 87.5 |
| 12                                                |    |      |      |      |      |      |      |      |      |      | 95.8 |

0.0000 - 0.0625 - 0    0.5625 - 0.6875 - 5/8  
0.0625 - 0.1875 - 1/8    0.6875 - 0.8125 - 3/4  
0.1875 - 0.3125 - 1/4    0.8125 - 0.9375 - 7/8  
0.3125 - 0.4375 - 3/8    0.9375 - 1.0000 - 1  
0.4375 - 0.5625 - 1/2

|                                                |                  |              |              |                                        |             |            |  |
|------------------------------------------------|------------------|--------------|--------------|----------------------------------------|-------------|------------|--|
| Air Control Techniques EPA Method 2 Data Sheet |                  |              |              | ACT Job Number                         |             | 1911       |  |
| Client                                         | Enviva           |              |              | ACT Run Number                         |             | 1          |  |
| Plant                                          | Wiggins          |              |              | Date                                   |             | 10/10/2013 |  |
| City/State                                     | Wiggins, MS      |              |              | Gauge ID                               |             | 909033     |  |
| Location                                       | Green Hammermill |              |              | Pitot ID                               |             | 4Pext      |  |
|                                                |                  |              |              | Thermocouple ID                        |             | TC25       |  |
| <b>Averages</b>                                | <b>3.961</b>     | <b>70.8</b>  |              |                                        |             |            |  |
|                                                | <b>Delta P</b>   | <b>Temp</b>  |              |                                        |             |            |  |
| <b>Point No.</b>                               | <b>In Water</b>  | <b>Deg F</b> | <b>Angle</b> |                                        |             |            |  |
| A-1                                            | 2.800            | 71           | 0            | Oxygen %                               | 20.9        |            |  |
| 2                                              | 3.900            | 71           | 1            |                                        |             |            |  |
| 3                                              | 4.400            | 71           | 1            | Carbon Dioxide %                       | 0           |            |  |
| 4                                              | 3.800            | 71           | 2            |                                        |             |            |  |
| 5                                              | 3.800            | 70           | 4            | Moisture %                             | 3.41        |            |  |
| 6                                              | 3.000            | 70           | 3            |                                        |             |            |  |
| B-1                                            | 4.200            | 72           | 0            | Stack Area sq.in.                      | 572.5552696 |            |  |
| 2                                              | 4.500            | 71           | 0            |                                        |             |            |  |
| 3                                              | 4.600            | 71           | 0            | Pbar                                   | 29.90       |            |  |
| 4                                              | 4.600            | 70           | 2            |                                        |             |            |  |
| 5                                              | 4.400            | 71           | 4            | Static Pressure                        | -20.8       |            |  |
| 6                                              | 3.800            | 70           | 3            |                                        |             |            |  |
| 0                                              |                  |              |              | Pitot Coef.                            | 0.84        |            |  |
| 0                                              |                  |              |              |                                        |             |            |  |
| 0                                              |                  |              |              | Start Time                             | 855         |            |  |
| 0                                              |                  |              |              |                                        |             |            |  |
| 0                                              |                  |              |              | Stop Time                              | 908         |            |  |
| 2                                              |                  |              |              |                                        |             |            |  |
| 3                                              |                  |              |              | Absolute Gas Pressure inches water     | Ps =        | 28.37      |  |
| 4                                              |                  |              |              |                                        |             |            |  |
| 5                                              |                  |              |              | Dry Mole Fraction of Gas               | Mfd =       | 0.96585    |  |
| 6                                              |                  |              |              |                                        |             |            |  |
| 7                                              |                  |              |              | Dry Molecular Weight of Gas lb/lb Mole | Md =        | 28.84      |  |
| 8                                              |                  |              |              |                                        |             |            |  |
| D-1                                            |                  |              |              | Wet Molecular Weight of Gas lb/lb Mole | Ms =        | 28.47      |  |
| 2                                              |                  |              |              |                                        |             |            |  |
| 3                                              |                  |              |              | Average Gas Velocity ft/sec            | vs =        | 115.87     |  |
| 4                                              |                  |              |              |                                        |             |            |  |
| 5                                              |                  |              |              | Dry Volumetric Gas Flow Rate           |             |            |  |
| 6                                              |                  |              |              | at Standard Conditions SCFM            | Qsd =       | 25184      |  |
| 7                                              |                  |              |              |                                        |             |            |  |
| 8                                              |                  |              |              | Wet Volumetric Flue Gas Flow Rate      |             |            |  |
| E-1                                            |                  |              |              | at Stack Conditions ACFM               | Qaw =       | 27642      |  |
| 2                                              |                  |              |              |                                        |             |            |  |
| 3                                              |                  |              |              | Wet Volumetric Gas Flow Rate           |             |            |  |
| 4                                              |                  |              |              | at Standard Conditions WSCFH           | WSCFH =     | 1564487    |  |
| 5                                              |                  |              |              |                                        |             |            |  |
| 6                                              |                  |              |              | LKCH                                   |             |            |  |
| 7                                              |                  |              |              | Pre                                    | 3-4         | good       |  |
| 8                                              |                  |              |              | Post                                   | 5-3         | good       |  |
| 0                                              |                  |              |              |                                        |             |            |  |
| 0                                              |                  |              |              |                                        |             |            |  |

|                                                |                  |              |  |                 |  |            |  |
|------------------------------------------------|------------------|--------------|--|-----------------|--|------------|--|
| Air Control Techniques EPA Method 2 Data Sheet |                  |              |  | ACT Job Number  |  | 1911       |  |
| Client                                         | Enviva           |              |  | ACT Run Number  |  | 2          |  |
| Plant                                          | Wiggins          |              |  | Date            |  | 10/10/2013 |  |
| City/State                                     | Wiggins, MS      |              |  | Gauge ID        |  | 909033     |  |
| Location                                       | Green Hammermill |              |  | Pitot ID        |  | 4Pext      |  |
|                                                |                  |              |  | Thermocouple ID |  | TC25       |  |
| <b>Averages</b>                                | <b>3.854</b>     | <b>70.6</b>  |  |                 |  |            |  |
|                                                | <b>Delta P</b>   | <b>Temp</b>  |  |                 |  |            |  |
| <b>Point No.</b>                               | <b>In Water</b>  | <b>Deg F</b> |  |                 |  |            |  |
| A-1                                            | 2.700            | 71           |  |                 |  |            |  |
| 2                                              | 3.800            | 71           |  |                 |  |            |  |
| 3                                              | 4.400            | 71           |  |                 |  |            |  |
| 4                                              | 3.800            | 70           |  |                 |  |            |  |
| 5                                              | 3.300            | 70           |  |                 |  |            |  |
| 6                                              | 3.100            | 68           |  |                 |  |            |  |
| B-1                                            | 3.900            | 72           |  |                 |  |            |  |
| 2                                              | 4.200            | 70           |  |                 |  |            |  |
| 3                                              | 4.400            | 70           |  |                 |  |            |  |
| 4                                              | 4.400            | 70           |  |                 |  |            |  |
| 5                                              | 4.300            | 71           |  |                 |  |            |  |
| 6                                              | 4.200            | 73           |  |                 |  |            |  |
| 0                                              |                  |              |  |                 |  |            |  |
| 0                                              |                  |              |  |                 |  |            |  |
| 0                                              |                  |              |  |                 |  |            |  |
| 0                                              |                  |              |  |                 |  |            |  |
| 0                                              |                  |              |  |                 |  |            |  |
| 2                                              |                  |              |  |                 |  |            |  |
| 3                                              |                  |              |  |                 |  |            |  |
| 4                                              |                  |              |  |                 |  |            |  |
| 5                                              |                  |              |  |                 |  |            |  |
| 6                                              |                  |              |  |                 |  |            |  |
| 7                                              |                  |              |  |                 |  |            |  |
| 8                                              |                  |              |  |                 |  |            |  |
| D-1                                            |                  |              |  |                 |  |            |  |
| 2                                              |                  |              |  |                 |  |            |  |
| 3                                              |                  |              |  |                 |  |            |  |
| 4                                              |                  |              |  |                 |  |            |  |
| 5                                              |                  |              |  |                 |  |            |  |
| 6                                              |                  |              |  |                 |  |            |  |
| 7                                              |                  |              |  |                 |  |            |  |
| 8                                              |                  |              |  |                 |  |            |  |
| E-1                                            |                  |              |  |                 |  |            |  |
| 2                                              |                  |              |  |                 |  |            |  |
| 3                                              |                  |              |  |                 |  |            |  |
| 4                                              |                  |              |  |                 |  |            |  |
| 5                                              |                  |              |  |                 |  |            |  |
| 6                                              |                  |              |  |                 |  |            |  |
| 7                                              |                  |              |  |                 |  |            |  |
| 8                                              |                  |              |  |                 |  |            |  |
| 0                                              |                  |              |  |                 |  |            |  |
| 0                                              |                  |              |  |                 |  |            |  |

|                   |             |
|-------------------|-------------|
| Oxygen %          | 20.9        |
| Carbon Dioxide %  | 0           |
| Moisture %        | 3.62        |
| Stack Area sq.in. | 572.5552696 |
| Pbar              | 29.90       |
| Static Pressure   | -20.8       |
| Pitot Coef.       | 0.84        |
| Start Time        | 1026        |
| Stop Time         | 1030        |

|                                                            |         |         |
|------------------------------------------------------------|---------|---------|
| Absolute Gas Pressure inches water                         | Ps =    | 28.37   |
| Dry Mole Fraction of Gas                                   | Mfd =   | 0.96382 |
| Dry Molecular Weight of Gas lb/lb Mole                     | Md =    | 28.84   |
| Wet Molecular Weight of Gas lb/lb Mole                     | Ms =    | 28.44   |
| Average Gas Velocity ft/sec                                | vs =    | 114.32  |
| Dry Volumetric Gas Flow Rate at Standard Conditions SCFM   | Qsd =   | 24803   |
| Wet Volumetric Flue Gas Flow Rate at Stack Conditions ACFM | Qaw =   | 27273   |
| Wet Volumetric Gas Flow Rate at Standard Conditions WSCFH  | WSCFH = | 1544072 |

|      |     |      |
|------|-----|------|
| LKCH |     |      |
| Pre  | 3-4 | good |
| Post | 5-3 | good |

|                                                |                  |              |  |                 |  |            |  |
|------------------------------------------------|------------------|--------------|--|-----------------|--|------------|--|
| Air Control Techniques EPA Method 2 Data Sheet |                  |              |  | ACT Job Number  |  | 1911       |  |
| Client                                         | Enviva           |              |  | ACT Run Number  |  | 3          |  |
| Plant                                          | Wiggins          |              |  | Date            |  | 10/10/2013 |  |
| City/State                                     | Wiggins, MS      |              |  | Gauge ID        |  | 909033     |  |
| Location                                       | Green Hammermill |              |  | Pitot ID        |  | 4Pext      |  |
|                                                |                  |              |  | Thermocouple ID |  | TC25       |  |
| <b>Averages</b>                                | <b>3.847</b>     | <b>70.9</b>  |  |                 |  |            |  |
|                                                | <b>Delta P</b>   | <b>Temp</b>  |  |                 |  |            |  |
| <b>Point No.</b>                               | <b>In Water</b>  | <b>Deg F</b> |  |                 |  |            |  |
| A-1                                            | 2.700            | 71           |  |                 |  |            |  |
| 2                                              | 3.600            | 71           |  |                 |  |            |  |
| 3                                              | 4.400            | 71           |  |                 |  |            |  |
| 4                                              | 3.700            | 71           |  |                 |  |            |  |
| 5                                              | 3.200            | 71           |  |                 |  |            |  |
| 6                                              | 3.300            | 69           |  |                 |  |            |  |
| B-1                                            | 4.000            | 72           |  |                 |  |            |  |
| 2                                              | 4.300            | 71           |  |                 |  |            |  |
| 3                                              | 4.300            | 71           |  |                 |  |            |  |
| 4                                              | 4.300            | 71           |  |                 |  |            |  |
| 5                                              | 4.300            | 71           |  |                 |  |            |  |
| 6                                              | 4.300            | 71           |  |                 |  |            |  |
| 0                                              |                  |              |  |                 |  |            |  |
| 0                                              |                  |              |  |                 |  |            |  |
| 0                                              |                  |              |  |                 |  |            |  |
| 0                                              |                  |              |  |                 |  |            |  |
| 0                                              |                  |              |  |                 |  |            |  |
| 2                                              |                  |              |  |                 |  |            |  |
| 3                                              |                  |              |  |                 |  |            |  |
| 4                                              |                  |              |  |                 |  |            |  |
| 5                                              |                  |              |  |                 |  |            |  |
| 6                                              |                  |              |  |                 |  |            |  |
| 7                                              |                  |              |  |                 |  |            |  |
| 8                                              |                  |              |  |                 |  |            |  |
| D-1                                            |                  |              |  |                 |  |            |  |
| 2                                              |                  |              |  |                 |  |            |  |
| 3                                              |                  |              |  |                 |  |            |  |
| 4                                              |                  |              |  |                 |  |            |  |
| 5                                              |                  |              |  |                 |  |            |  |
| 6                                              |                  |              |  |                 |  |            |  |
| 7                                              |                  |              |  |                 |  |            |  |
| 8                                              |                  |              |  |                 |  |            |  |
| E-1                                            |                  |              |  |                 |  |            |  |
| 2                                              |                  |              |  |                 |  |            |  |
| 3                                              |                  |              |  |                 |  |            |  |
| 4                                              |                  |              |  |                 |  |            |  |
| 5                                              |                  |              |  |                 |  |            |  |
| 6                                              |                  |              |  |                 |  |            |  |
| 7                                              |                  |              |  |                 |  |            |  |
| 8                                              |                  |              |  |                 |  |            |  |
| 0                                              |                  |              |  |                 |  |            |  |
| 0                                              |                  |              |  |                 |  |            |  |

|                   |             |
|-------------------|-------------|
| Oxygen %          | 20.9        |
| Carbon Dioxide %  | 0           |
| Moisture %        | 2.37        |
| Stack Area sq.in. | 572.5552696 |
| Pbar              | 29.90       |
| Static Pressure   | -20.8       |
| Pitot Coef.       | 0.84        |
| Start Time        | 1141        |
| Stop Time         | 1144        |

|                                                            |         |         |
|------------------------------------------------------------|---------|---------|
| Absolute Gas Pressure inches water                         | Ps =    | 28.37   |
| Dry Mole Fraction of Gas                                   | Mfd =   | 0.97626 |
| Dry Molecular Weight of Gas lb/lb Mole                     | Md =    | 28.84   |
| Wet Molecular Weight of Gas lb/lb Mole                     | Ms =    | 28.58   |
| Average Gas Velocity ft/sec                                | vs =    | 113.97  |
| Dry Volumetric Gas Flow Rate at Standard Conditions SCFM   | Qsd =   | 25031   |
| Wet Volumetric Flue Gas Flow Rate at Stack Conditions ACFM | Qaw =   | 27189   |
| Wet Volumetric Gas Flow Rate at Standard Conditions WSCFH  | WSCFH = | 1538379 |

|      |     |      |
|------|-----|------|
| LKCH |     |      |
| Pre  | 3-4 | good |
| Post | 6-4 | good |

**Method 1 - Air Control Techniques, P.C.**

Date

10/12/2013

Client Enviva  
Job # 1911  
Plant Name Wiggins  
State Mississippi  
City Wiggins  
Sampling Location Pellet Mill 2 Aspiration

No. of Ports Available 1  
No. of Ports Used 1  
Port Inside Diameter, Inches 1  
Distance From Far Wall To Outside Of Port, Inches 6  
Nipple Length And/Or Wall Thickness, Inches 0  
Depth Of Stack Or Duct, Inches 6  
Stack Or Duct Width (if rectangular), Inches  
Equiv. Diameter = 2DW/(D+W), Inches 6  
Stack/Duct Area, Square Feet 0.20  
(□ x R<sup>2</sup> or L x W)  
Upstream Downstream  
Distance to Flow Disturbances, Inches 19 39  
Diameters 3.17 6.50

**Point Location Data**

| Point | % of Duct<br>Depth | Distance From<br>Inside Wall | Distance From<br>Outside of Port |
|-------|--------------------|------------------------------|----------------------------------|
| 1     | 6.7                | 3/8                          | 1                                |
| 2     | 25.0               | 1 4/8                        | 1 4/8                            |
| 3     | 75.0               | 4 4/8                        | 4 4/8                            |
| 4     | 93.3               | 5 5/8                        | 5                                |
| 5     |                    |                              |                                  |
| 6     |                    |                              |                                  |
| 7     |                    |                              |                                  |
| 8     |                    |                              |                                  |
| 9     |                    |                              |                                  |
| 10    |                    |                              |                                  |
| 11    |                    |                              |                                  |
| 12    |                    |                              |                                  |
| 13    |                    |                              |                                  |
| 14    |                    |                              |                                  |
| 15    |                    |                              |                                  |
| 16    |                    |                              |                                  |
| 17    |                    |                              |                                  |
| 18    |                    |                              |                                  |
| 19    |                    |                              |                                  |
| 20    |                    |                              |                                  |
| 21    |                    |                              |                                  |
| 22    |                    |                              |                                  |
| 23    |                    |                              |                                  |
| 24    |                    |                              |                                  |
| 25    |                    |                              |                                  |

Used 8 points because  
of diameter otherwise  
first 3 points are  
at 1" from wall

Note: If more than 8 and 2 diameters and if duct dia.  
is less than 24" use 8 or 9 points.

| Velocity | UP | Down | Particulate |
|----------|----|------|-------------|
| 12       | 8  | 2    | 12          |
| 12       | 7  | 1.75 | 12          |
| 12       | 6  | 1.5  | 16          |
| 16       | 5  | 1.25 | 20          |
| 16       | 2  | 0.5  | 24 or 25    |

**Location of Points in Circular Stacks or Ducts**

|    | 4    | 6    | 8    | 10   | 12   | 14   | 16   | 18   | 20   | 22   | 24   |
|----|------|------|------|------|------|------|------|------|------|------|------|
| 1  | 6.7  | 4.4  | 3.2  | 2.6  | 2.1  | 1.8  | 1.6  | 1.4  | 1.3  | 1.1  | 1.1  |
| 2  | 25.0 | 14.6 | 10.6 | 8.2  | 6.7  | 5.7  | 4.9  | 4.4  | 3.9  | 3.5  | 3.2  |
| 3  | 75.0 | 29.6 | 19.4 | 14.6 | 11.8 | 9.9  | 8.5  | 7.5  | 6.7  | 6.0  | 5.5  |
| 4  | 93.3 | 70.4 | 32.3 | 22.6 | 17.7 | 14.6 | 12.5 | 10.9 | 9.7  | 8.7  | 7.9  |
| 5  |      | 85.4 | 67.7 | 34.2 | 25.0 | 20.1 | 16.9 | 14.6 | 12.9 | 11.6 | 10.5 |
| 6  |      | 95.6 | 80.6 | 65.8 | 35.6 | 26.9 | 22.0 | 18.8 | 16.5 | 14.6 | 13.2 |
| 7  |      |      | 89.5 | 77.4 | 64.4 | 36.6 | 28.3 | 23.6 | 20.4 | 18.0 | 16.1 |
| 8  |      |      | 96.8 | 85.4 | 75.0 | 63.4 | 37.5 | 29.6 | 25.0 | 21.8 | 19.4 |
| 9  |      |      |      | 91.8 | 82.3 | 73.1 | 62.5 | 38.2 | 30.6 | 26.2 | 23.0 |
| 10 |      |      |      | 97.4 | 88.2 | 79.9 | 71.7 | 61.8 | 38.8 | 31.5 | 27.2 |
| 11 |      |      |      |      | 93.3 | 85.4 | 78.0 | 70.4 | 61.2 | 39.3 | 32.3 |
| 12 |      |      |      |      | 97.9 | 90.1 | 83.1 | 76.4 | 69.4 | 60.7 | 39.8 |
| 13 |      |      |      |      |      | 94.3 | 87.6 | 81.2 | 75.0 | 68.5 | 60.2 |
| 14 |      |      |      |      |      | 98.2 | 91.5 | 85.4 | 79.6 | 73.8 | 67.7 |
| 15 |      |      |      |      |      |      | 95.1 | 89.1 | 83.5 | 78.2 | 72.8 |
| 16 |      |      |      |      |      |      | 98.4 | 92.5 | 87.1 | 82.0 | 77.0 |
| 17 |      |      |      |      |      |      |      | 95.6 | 90.3 | 85.4 | 80.6 |
| 18 |      |      |      |      |      |      |      | 98.6 | 93.3 | 88.4 | 83.9 |
| 19 |      |      |      |      |      |      |      |      | 96.1 | 91.3 | 86.8 |
| 20 |      |      |      |      |      |      |      |      | 98.7 | 94.0 | 89.5 |
| 21 |      |      |      |      |      |      |      |      |      | 96.5 | 92.1 |
| 22 |      |      |      |      |      |      |      |      |      | 98.9 | 94.5 |
| 23 |      |      |      |      |      |      |      |      |      |      | 96.8 |
| 24 |      |      |      |      |      |      |      |      |      |      | 96.9 |

**Location of Points in Rectangular Stacks or Ducts**

|    | 2  | 3    | 4    | 5    | 6    | 7    | 8    | 9    | 10   | 11   | 12   |
|----|----|------|------|------|------|------|------|------|------|------|------|
| 1  | 25 | 16.7 | 12.5 | 10.0 | 8.3  | 7.1  | 6.3  | 5.6  | 5.0  | 4.5  | 4.2  |
| 2  | 75 | 50   | 37.5 | 30.0 | 25   | 21.4 | 18.8 | 16.7 | 15.0 | 13.6 | 12.5 |
| 3  |    | 83.3 | 62.5 | 50.0 | 41.7 | 35.7 | 31.3 | 27.8 | 25.0 | 22.7 | 20.8 |
| 4  |    |      | 87.5 | 70.0 | 58.3 | 50   | 43.8 | 28.9 | 35.0 | 31.8 | 29.2 |
| 5  |    |      |      | 90.0 | 75   | 64.3 | 56.3 | 50   | 45.0 | 40.9 | 37.5 |
| 6  |    |      |      |      | 91.7 | 78.6 | 68.8 | 61.1 | 55.0 | 50   | 45.8 |
| 7  |    |      |      |      |      | 92.9 | 81.3 | 72.2 | 65.0 | 59.1 | 54.2 |
| 8  |    |      |      |      |      |      | 93.8 | 83.3 | 75.0 | 68.2 | 62.5 |
| 9  |    |      |      |      |      |      |      | 94.4 | 85.0 | 77.3 | 70.8 |
| 10 |    |      |      |      |      |      |      |      | 95.0 | 86.4 | 79.2 |
| 11 |    |      |      |      |      |      |      |      |      | 95.5 | 87.5 |
| 12 |    |      |      |      |      |      |      |      |      |      | 96.8 |

0.0000 - 0.0625 - 0 0.5625 - 0.6875 - 5/8  
0.0625 - 0.1875 - 1/8 0.6875 - 0.8125 - 3/4  
0.1875 - 0.3125 - 1/4 0.8125 - 0.9375 - 7/8  
0.3125 - 0.4375 - 3/8 0.9375 - 1.0000 - 1  
0.4375 - 0.5625 - 1/2



|                                                |                          |              |              |                                               |                   |                |  |
|------------------------------------------------|--------------------------|--------------|--------------|-----------------------------------------------|-------------------|----------------|--|
| Air Control Techniques EPA Method 2 Data Sheet |                          |              |              | ACT Job Number                                |                   | 1911           |  |
| Client                                         | Enviva                   |              |              | ACT Run Number                                |                   | 16             |  |
| Plant                                          | Wiggins                  |              |              | Date                                          |                   | 10/12/2013     |  |
| City/State                                     | Wiggins, MS              |              |              | Gauge ID                                      |                   | 909033         |  |
| Location                                       | Pellet Mill 2 Aspiration |              |              | Pitot ID                                      |                   | 4Pext          |  |
| <b>Averages</b>                                |                          | <b>5.359</b> | <b>148.6</b> | Thermocouple ID                               |                   | TC25           |  |
|                                                | <b>Delta P</b>           | <b>Temp</b>  |              |                                               |                   |                |  |
| <b>Point No.</b>                               | <b>In Water</b>          | <b>Deg F</b> | <b>Angle</b> |                                               |                   |                |  |
| <b>A-1</b>                                     | 5.400                    | 149          | 0            | <b>Oxygen %</b>                               | <b>20.9</b>       |                |  |
| <b>2</b>                                       | 5.700                    | 148          | 0            |                                               |                   |                |  |
| <b>3</b>                                       | 5.100                    | 149          | 2            | <b>Carbon Dioxide %</b>                       | <b>0</b>          |                |  |
| <b>4</b>                                       | 5.000                    | 149          | 1            |                                               |                   |                |  |
| <b>B-1</b>                                     | 5.700                    | 149          | 0            | <b>Moisture %</b>                             | <b>27.67</b>      |                |  |
| <b>2</b>                                       | 5.600                    | 148          | 1            |                                               |                   |                |  |
| <b>3</b>                                       | 5.400                    | 149          | 2            | <b>Stack Area sq.in.</b>                      | <b>28.2743343</b> |                |  |
| <b>4</b>                                       | 5.000                    | 148          | 0            |                                               |                   |                |  |
| <b>0</b>                                       |                          |              |              | <b>Pbar</b>                                   | <b>29.85</b>      |                |  |
| <b>0</b>                                       |                          |              |              |                                               |                   |                |  |
| <b>0</b>                                       |                          |              |              | <b>Static Pressure</b>                        | <b>-7.5</b>       |                |  |
| <b>0</b>                                       |                          |              |              |                                               |                   |                |  |
| <b>0</b>                                       |                          |              |              | <b>Pitot Coef.</b>                            | <b>0.84</b>       |                |  |
| <b>0</b>                                       |                          |              |              |                                               |                   |                |  |
| <b>0</b>                                       |                          |              |              | <b>Start Time</b>                             | <b>1445</b>       |                |  |
| <b>0</b>                                       |                          |              |              |                                               |                   |                |  |
| <b>0</b>                                       |                          |              |              | <b>Stop Time</b>                              | <b>1448</b>       |                |  |
| <b>0</b>                                       |                          |              |              |                                               |                   |                |  |
| <b>0</b>                                       |                          |              |              | <b>Absolute Gas Pressure inches water</b>     | <b>Ps =</b>       | <b>29.30</b>   |  |
| <b>0</b>                                       |                          |              |              |                                               |                   |                |  |
| <b>0</b>                                       |                          |              |              | <b>Dry Mole Fraction of Gas</b>               | <b>Mfd =</b>      | <b>0.72332</b> |  |
| <b>0</b>                                       |                          |              |              |                                               |                   |                |  |
| <b>0</b>                                       |                          |              |              | <b>Dry Molecular Weight of Gas lb/lb Mole</b> | <b>Md =</b>       | <b>28.84</b>   |  |
| <b>0</b>                                       |                          |              |              |                                               |                   |                |  |
| <b>0</b>                                       |                          |              |              | <b>Wet Molecular Weight of Gas lb/lb Mole</b> | <b>Ms =</b>       | <b>25.84</b>   |  |
| <b>0</b>                                       |                          |              |              |                                               |                   |                |  |
| <b>0</b>                                       |                          |              |              | <b>Average Gas Velocity ft/sec</b>            | <b>vs =</b>       | <b>149.06</b>  |  |
| <b>0</b>                                       |                          |              |              |                                               |                   |                |  |
| <b>0</b>                                       |                          |              |              | <b>Dry Volumetric Gas Flow Rate</b>           |                   |                |  |
| <b>0</b>                                       |                          |              |              | <b>at Standard Conditions SCFM</b>            | <b>Qsd =</b>      | <b>1079</b>    |  |
| <b>0</b>                                       |                          |              |              |                                               |                   |                |  |
| <b>0</b>                                       |                          |              |              | <b>Wet Volumetric Flue Gas Flow Rate</b>      |                   |                |  |
| <b>0</b>                                       |                          |              |              | <b>at Stack Conditions ACFM</b>               | <b>Qaw =</b>      | <b>1756</b>    |  |
| <b>0</b>                                       |                          |              |              |                                               |                   |                |  |
| <b>0</b>                                       |                          |              |              | <b>Wet Volumetric Gas Flow Rate</b>           |                   |                |  |
| <b>0</b>                                       |                          |              |              | <b>at Standard Conditions WSCFH</b>           | <b>WSCFH =</b>    | <b>89506.7</b> |  |
| <b>0</b>                                       |                          |              |              |                                               |                   |                |  |
| <b>0</b>                                       |                          |              |              |                                               |                   |                |  |
| <b>0</b>                                       |                          |              |              | LKCH                                          |                   |                |  |
| <b>0</b>                                       |                          |              |              | Pre                                           | 4-3               | good           |  |
| <b>8</b>                                       |                          |              |              | Post                                          | 5-5               | good           |  |
|                                                |                          |              |              |                                               |                   |                |  |
|                                                |                          |              |              |                                               |                   |                |  |

|                                                |                          |              |              |                                               |  |                |                |
|------------------------------------------------|--------------------------|--------------|--------------|-----------------------------------------------|--|----------------|----------------|
| Air Control Techniques EPA Method 2 Data Sheet |                          |              |              | ACT Job Number                                |  | 1911           |                |
| Client                                         | Enviva                   |              |              | ACT Run Number                                |  | 17             |                |
| Plant                                          | Wiggins                  |              |              | Date                                          |  | 10/12/13       |                |
| City/State                                     | Wiggins, MS              |              |              | Gauge ID                                      |  | 909033         |                |
| Location                                       | Pellet Mill 2 Aspiration |              |              | Pitot ID                                      |  | 4Pext          |                |
| <b>Averages</b>                                |                          | <b>4.944</b> | <b>148.3</b> | Thermocouple ID                               |  | TC25           |                |
|                                                | <b>Delta P</b>           | <b>Temp</b>  |              |                                               |  |                |                |
| <b>Point No.</b>                               | <b>In Water</b>          | <b>Deg F</b> |              |                                               |  |                |                |
| A-1                                            | 3.700                    | 147          |              | <b>Oxygen %</b>                               |  | <b>20.9</b>    |                |
| 2                                              | 5.500                    | 149          |              |                                               |  |                |                |
| 3                                              | 5.400                    | 148          |              | <b>Carbon Dioxide %</b>                       |  | <b>0</b>       |                |
| 4                                              | 5.200                    | 148          |              |                                               |  |                |                |
| B-1                                            | 5.600                    | 148          |              | <b>Moisture %</b>                             |  | <b>29.33</b>   |                |
| 2                                              | 4.800                    | 148          |              |                                               |  |                |                |
| 3                                              | 4.900                    | 149          |              | <b>Stack Area sq.in.</b>                      |  | <b>28.2743</b> |                |
| 4                                              | 4.600                    | 149          |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Pbar</b>                                   |  | <b>29.85</b>   |                |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Static Pressure</b>                        |  | <b>-7.5</b>    |                |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Pitot Coef.</b>                            |  | <b>0.84</b>    |                |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Start Time</b>                             |  | <b>1611</b>    |                |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Stop Time</b>                              |  | <b>1615</b>    |                |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Absolute Gas Pressure inches water</b>     |  | <b>Ps =</b>    | <b>29.30</b>   |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Dry Mole Fraction of Gas</b>               |  | <b>Mfd =</b>   | <b>0.7067</b>  |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Dry Molecular Weight of Gas lb/lb Mole</b> |  | <b>Md =</b>    | <b>28.84</b>   |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Wet Molecular Weight of Gas lb/lb Mole</b> |  | <b>Ms =</b>    | <b>25.66</b>   |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Average Gas Velocity ft/sec</b>            |  | <b>vs =</b>    | <b>143.63</b>  |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Dry Volumetric Gas Flow Rate</b>           |  |                |                |
| 0                                              |                          |              |              | <b>at Standard Conditions SCFM</b>            |  | <b>Qsd =</b>   | <b>1016</b>    |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Wet Volumetric Flue Gas Flow Rate</b>      |  |                |                |
| 0                                              |                          |              |              | <b>at Stack Conditions ACFM</b>               |  | <b>Qaw =</b>   | <b>1692</b>    |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Wet Volumetric Gas Flow Rate</b>           |  |                |                |
| 0                                              |                          |              |              | <b>at Standard Conditions WSCFH</b>           |  | <b>WSCFH =</b> | <b>86302.3</b> |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>LKCH</b>                                   |  |                |                |
| 0                                              |                          |              |              | <b>Pre</b>                                    |  | <b>4-3</b>     | <b>good</b>    |
| 8                                              |                          |              |              | <b>Post</b>                                   |  | <b>5-5</b>     | <b>good</b>    |
|                                                |                          |              |              |                                               |  |                |                |
|                                                |                          |              |              |                                               |  |                |                |

|                                                |                          |              |              |                                               |  |                |                |
|------------------------------------------------|--------------------------|--------------|--------------|-----------------------------------------------|--|----------------|----------------|
| Air Control Techniques EPA Method 2 Data Sheet |                          |              |              | ACT Job Number                                |  | 1911           |                |
| Client                                         | Enviva                   |              |              | ACT Run Number                                |  | 18             |                |
| Plant                                          | Wiggins                  |              |              | Date                                          |  | 10/12/13       |                |
| City/State                                     | Wiggins, MS              |              |              | Gauge ID                                      |  | 909033         |                |
| Location                                       | Pellet Mill 2 Aspiration |              |              | Pitot ID                                      |  | 4Pext          |                |
| <b>Averages</b>                                |                          | <b>4.547</b> | <b>152.1</b> | Thermocouple ID                               |  | TC25           |                |
|                                                | <b>Delta P</b>           | <b>Temp</b>  |              |                                               |  |                |                |
| <b>Point No.</b>                               | <b>In Water</b>          | <b>Deg F</b> |              |                                               |  |                |                |
| A-1                                            | 4.400                    | 152          |              | <b>Oxygen %</b>                               |  | <b>20.9</b>    |                |
| 2                                              | 4.600                    | 153          |              |                                               |  |                |                |
| 3                                              | 4.600                    | 152          |              | <b>Carbon Dioxide %</b>                       |  | <b>0</b>       |                |
| 4                                              | 4.300                    | 152          |              |                                               |  |                |                |
| B-1                                            | 4.800                    | 152          |              | <b>Moisture %</b>                             |  | <b>28.19</b>   |                |
| 2                                              | 5.000                    | 152          |              |                                               |  |                |                |
| 3                                              | 4.400                    | 153          |              | <b>Stack Area sq.in.</b>                      |  | <b>28.2743</b> |                |
| 4                                              | 4.300                    | 151          |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Pbar</b>                                   |  | <b>29.85</b>   |                |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Static Pressure</b>                        |  | <b>-7.5</b>    |                |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Pitot Coef.</b>                            |  | <b>0.84</b>    |                |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Start Time</b>                             |  | <b>1739</b>    |                |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Stop Time</b>                              |  | <b>1742</b>    |                |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Absolute Gas Pressure inches water</b>     |  | <b>Ps =</b>    | <b>29.30</b>   |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Dry Mole Fraction of Gas</b>               |  | <b>Mfd =</b>   | <b>0.71813</b> |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Dry Molecular Weight of Gas lb/lb Mole</b> |  | <b>Md =</b>    | <b>28.84</b>   |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Wet Molecular Weight of Gas lb/lb Mole</b> |  | <b>Ms =</b>    | <b>25.78</b>   |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Average Gas Velocity ft/sec</b>            |  | <b>vs =</b>    | <b>137.85</b>  |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Dry Volumetric Gas Flow Rate</b>           |  |                |                |
| 0                                              |                          |              |              | <b>at Standard Conditions SCFM</b>            |  | <b>Qsd =</b>   | <b>985</b>     |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Wet Volumetric Flue Gas Flow Rate</b>      |  |                |                |
| 0                                              |                          |              |              | <b>at Stack Conditions ACFM</b>               |  | <b>Qaw =</b>   | <b>1624</b>    |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>Wet Volumetric Gas Flow Rate</b>           |  |                |                |
| 0                                              |                          |              |              | <b>at Standard Conditions WSCFH</b>           |  | <b>WSCFH =</b> | <b>82302.1</b> |
| 0                                              |                          |              |              |                                               |  |                |                |
| 0                                              |                          |              |              | <b>LKCH</b>                                   |  |                |                |
| 0                                              |                          |              |              | <b>Pre</b>                                    |  | <b>4-3</b>     | <b>good</b>    |
| 8                                              |                          |              |              | <b>Post</b>                                   |  | <b>5-5</b>     | <b>good</b>    |
|                                                |                          |              |              |                                               |  |                |                |
|                                                |                          |              |              |                                               |  |                |                |

**Method 1 - Air Control Techniques, P.C.**

Date

10/11/2013

|                                                   |                  |
|---------------------------------------------------|------------------|
| Client                                            | Enviva           |
| Job #                                             | 1911             |
| Plant Name                                        | Wiggins          |
| State                                             | Mississippi      |
| City                                              | Wiggins          |
| Sampling Location                                 | Dry Hammermill 2 |
| No. of Ports Available                            | 2                |
| No. of Ports Used                                 | 2                |
| Port Inside Diameter, Inches                      | 0                |
| Distance From Far Wall To Outside Of Port, Inches | 22               |
| Nipple Length And/Or Wall Thickness, Inches       | 0                |
| Depth Of Stack Or Duct, Inches                    | 22               |
| Stack Or Duct Width (if rectangular), Inches      |                  |
| Equiv. Diameter = 2DW/(D+W), Inches               | 22               |
| Stack/Duct Area, Square Feet                      | 2.6              |
| (□ x R <sup>2</sup> or L x W)                     |                  |
| Upstream                                          | Downstream       |
| Distance to Flow Disturbances, inches             | 52               |
| Diameters                                         | 2.36 0.36        |

2 diff nipples probe marked to inside of port

| Point Location Data |                    |                              |                                  |
|---------------------|--------------------|------------------------------|----------------------------------|
| Point               | % of Duct<br>Depth | Distance From<br>Inside Wall | Distance From<br>Outside of Port |
| 1                   | 3.2                | 6/8                          | 6/8                              |
| 2                   | 10.6               | 2 3/8                        | 2 3/8                            |
| 3                   | 19.4               | 4 2/8                        | 4 2/8                            |
| 4                   | 32.3               | 7 1/8                        | 7 1/8                            |
| 5                   | 67.7               | 14 7/8                       | 14 7/8                           |
| 6                   | 80.6               | 17 6/8                       | 17 6/8                           |
| 7                   | 89.5               | 19 6/8                       | 19 6/8                           |
| 8                   | 96.8               | 21 2/8                       | 21 2/8                           |
| 9                   |                    |                              |                                  |
| 10                  |                    |                              |                                  |
| 11                  |                    |                              |                                  |
| 12                  |                    |                              |                                  |
| 13                  |                    |                              |                                  |
| 14                  |                    |                              |                                  |
| 15                  |                    |                              |                                  |
| 16                  |                    |                              |                                  |
| 17                  |                    |                              |                                  |
| 18                  |                    |                              |                                  |
| 19                  |                    |                              |                                  |
| 20                  |                    |                              |                                  |
| 21                  |                    |                              |                                  |
| 22                  |                    |                              |                                  |
| 23                  |                    |                              |                                  |
| 24                  |                    |                              |                                  |
| 25                  |                    |                              |                                  |

| Note: If more than 8 and 2 diameters and if duct dia. is less than 24" use 8 or 9 points. |    |      |             |
|-------------------------------------------------------------------------------------------|----|------|-------------|
| Diameters                                                                                 |    |      |             |
| Velocity                                                                                  | UP | Down | Particulate |
| 12                                                                                        | 8  | 2    | 12          |
| 12                                                                                        | 7  | 1.75 | 12          |
| 12                                                                                        | 6  | 1.5  | 16          |
| 16                                                                                        | 5  | 1.25 | 20          |
| 16                                                                                        | 2  | 0.5  | 24 or 25    |

| Location of Points in Circular Stacks or Ducts |      |      |      |      |      |      |      |      |      |      |      |
|------------------------------------------------|------|------|------|------|------|------|------|------|------|------|------|
|                                                | 4    | 6    | 8    | 10   | 12   | 14   | 16   | 18   | 20   | 22   | 24   |
| 1                                              | 6.7  | 4.4  | 3.2  | 2.6  | 2.1  | 1.8  | 1.6  | 1.4  | 1.3  | 1.1  | 1.1  |
| 2                                              | 25.0 | 14.6 | 10.6 | 8.2  | 6.7  | 5.7  | 4.9  | 4.4  | 3.9  | 3.5  | 3.2  |
| 3                                              | 75.0 | 29.6 | 19.4 | 14.6 | 11.8 | 9.9  | 8.5  | 7.5  | 6.7  | 6.0  | 5.5  |
| 4                                              | 93.3 | 70.4 | 32.3 | 22.6 | 17.7 | 14.6 | 12.5 | 10.9 | 9.7  | 8.7  | 7.9  |
| 5                                              |      | 85.4 | 67.7 | 34.2 | 25.0 | 20.1 | 16.9 | 14.6 | 12.9 | 11.6 | 10.5 |
| 6                                              |      | 95.6 | 80.6 | 65.8 | 35.6 | 26.9 | 22.0 | 18.8 | 16.5 | 14.6 | 13.2 |
| 7                                              |      |      | 89.5 | 77.4 | 64.4 | 36.6 | 28.3 | 23.6 | 20.4 | 18.0 | 16.1 |
| 8                                              |      |      | 96.8 | 85.4 | 75.0 | 63.4 | 37.5 | 29.6 | 25.0 | 21.8 | 19.4 |
| 9                                              |      |      |      | 91.8 | 82.3 | 73.1 | 62.5 | 38.2 | 30.6 | 26.2 | 23.0 |
| 10                                             |      |      |      | 97.4 | 88.2 | 79.9 | 71.7 | 61.8 | 38.8 | 31.5 | 27.2 |
| 11                                             |      |      |      |      | 93.3 | 85.4 | 78.0 | 70.4 | 61.2 | 39.3 | 32.3 |
| 12                                             |      |      |      |      | 97.9 | 90.1 | 83.1 | 76.4 | 69.4 | 60.7 | 39.8 |
| 13                                             |      |      |      |      |      | 94.3 | 87.6 | 81.2 | 75.0 | 68.5 | 60.2 |
| 14                                             |      |      |      |      |      | 98.2 | 91.5 | 85.4 | 79.6 | 73.8 | 67.7 |
| 15                                             |      |      |      |      |      |      | 95.1 | 89.1 | 83.5 | 78.2 | 72.8 |
| 16                                             |      |      |      |      |      |      | 98.4 | 92.5 | 87.1 | 82.0 | 77.0 |
| 17                                             |      |      |      |      |      |      |      | 95.6 | 90.3 | 85.4 | 80.6 |
| 18                                             |      |      |      |      |      |      |      | 98.6 | 93.3 | 88.4 | 83.9 |
| 19                                             |      |      |      |      |      |      |      |      | 96.1 | 91.3 | 86.8 |
| 20                                             |      |      |      |      |      |      |      |      | 98.7 | 94.0 | 89.5 |
| 21                                             |      |      |      |      |      |      |      |      |      | 96.5 | 92.1 |
| 22                                             |      |      |      |      |      |      |      |      |      | 98.9 | 94.5 |
| 23                                             |      |      |      |      |      |      |      |      |      |      | 96.8 |
| 24                                             |      |      |      |      |      |      |      |      |      |      | 98.9 |

| Location of Points in Rectangular Stacks or Ducts |    |      |      |      |      |      |      |      |      |      |      |
|---------------------------------------------------|----|------|------|------|------|------|------|------|------|------|------|
|                                                   | 2  | 3    | 4    | 5    | 6    | 7    | 8    | 9    | 10   | 11   | 12   |
| 1                                                 | 25 | 16.7 | 12.5 | 10.0 | 8.3  | 7.1  | 6.3  | 5.6  | 5.0  | 4.5  | 4.2  |
| 2                                                 | 75 | 50   | 37.5 | 30.0 | 25   | 21.4 | 18.8 | 16.7 | 15.0 | 13.6 | 12.5 |
| 3                                                 |    | 83.3 | 62.5 | 50.0 | 41.7 | 35.7 | 31.3 | 27.8 | 25.0 | 22.7 | 20.8 |
| 4                                                 |    |      | 87.5 | 70.0 | 58.3 | 50   | 43.8 | 28.9 | 35.0 | 31.8 | 29.2 |
| 5                                                 |    |      |      | 90.0 | 75   | 64.3 | 56.3 | 50   | 45.0 | 40.9 | 37.5 |
| 6                                                 |    |      |      |      | 91.7 | 78.6 | 68.8 | 61.1 | 55.0 | 50   | 45.8 |
| 7                                                 |    |      |      |      |      | 92.9 | 81.3 | 72.2 | 65.0 | 59.1 | 54.2 |
| 8                                                 |    |      |      |      |      |      | 93.8 | 83.3 | 75.0 | 68.2 | 62.5 |
| 9                                                 |    |      |      |      |      |      |      | 94.4 | 85.0 | 77.3 | 70.8 |
| 10                                                |    |      |      |      |      |      |      |      | 95.0 | 86.4 | 79.2 |
| 11                                                |    |      |      |      |      |      |      |      |      | 95.5 | 87.5 |
| 12                                                |    |      |      |      |      |      |      |      |      |      | 95.8 |

0.0000 - 0.0625 - 0    0.5625 - 0.6875 - 5/8  
0.0625 - 0.1875 - 1/8    0.6875 - 0.8125 - 3/4  
0.1875 - 0.3125 - 1/4    0.8125 - 0.9375 - 7/8  
0.3125 - 0.4375 - 3/8    0.9375 - 1.0000 - 1  
0.4375 - 0.5625 - 1/2

|                                                |                  |              |              |                                        |           |            |  |
|------------------------------------------------|------------------|--------------|--------------|----------------------------------------|-----------|------------|--|
| Air Control Techniques EPA Method 2 Data Sheet |                  |              |              | ACT Job Number                         |           | 1911       |  |
| Client                                         | Enviva           |              |              | ACT Run Number                         |           | 10         |  |
| Plant                                          | Wiggins          |              |              | Date                                   |           | 10/11/2013 |  |
| City/State                                     | Wiggins, MS      |              |              | Gauge ID                               |           | 909033     |  |
| Location                                       | Dry Hammermill 2 |              |              | Pitot ID                               |           | 4Pext      |  |
| <b>Averages</b>                                |                  | <b>2.601</b> | <b>122.4</b> | Thermocouple ID                        |           | TC25       |  |
|                                                | <b>Delta P</b>   | <b>Temp</b>  |              |                                        |           |            |  |
| <b>Point No.</b>                               | <b>In Water</b>  | <b>Deg F</b> | <b>Angle</b> |                                        |           |            |  |
| A-1                                            | 2.400            | 121          | 0            | Oxygen %                               | 20.9      |            |  |
| 2                                              | 2.600            | 122          | 1            |                                        |           |            |  |
| 3                                              | 2.550            | 122          | 0            | Carbon Dioxide %                       | 0         |            |  |
| 4                                              | 2.400            | 123          | 0            |                                        |           |            |  |
| 5                                              | 2.600            | 123          | 2            | Moisture %                             | 4.25      |            |  |
| 6                                              | 3.000            | 122          | 0            |                                        |           |            |  |
| 7                                              | 3.000            | 121          | 0            | Stack Area sq.in.                      | 380.13272 |            |  |
| 8                                              | 3.300            | 120          | 0            |                                        |           |            |  |
| B-1                                            | 2.200            | 122          | 2            | Pbar                                   | 29.80     |            |  |
| 2                                              | 2.200            | 122          | 0            |                                        |           |            |  |
| 3                                              | 2.300            | 123          | 1            | Static Pressure                        | 1.4       |            |  |
| 4                                              | 2.300            | 123          | 0            |                                        |           |            |  |
| 5                                              | 2.800            | 123          | 2            | Pitot Coef.                            | 0.84      |            |  |
| 6                                              | 2.700            | 123          | 0            |                                        |           |            |  |
| 7                                              | 2.800            | 125          | 1            | Start Time                             | 1745      |            |  |
| 8                                              | 2.600            | 124          | 1            |                                        |           |            |  |
| 0                                              |                  |              |              | Stop Time                              | 1758      |            |  |
| 2                                              |                  |              |              |                                        |           |            |  |
| 3                                              |                  |              |              | Absolute Gas Pressure inches water     | Ps =      | 29.90      |  |
| 4                                              |                  |              |              |                                        |           |            |  |
| 5                                              |                  |              |              | Dry Mole Fraction of Gas               | Mfd =     | 0.95746    |  |
| 6                                              |                  |              |              |                                        |           |            |  |
| 7                                              |                  |              |              | Dry Molecular Weight of Gas lb/lb Mole | Md =      | 28.84      |  |
| 8                                              |                  |              |              |                                        |           |            |  |
| D-1                                            |                  |              |              | Wet Molecular Weight of Gas lb/lb Mole | Ms =      | 28.38      |  |
| 2                                              |                  |              |              |                                        |           |            |  |
| 3                                              |                  |              |              | Average Gas Velocity ft/sec            | vs =      | 95.95      |  |
| 4                                              |                  |              |              |                                        |           |            |  |
| 5                                              |                  |              |              | Dry Volumetric Gas Flow Rate           |           |            |  |
| 6                                              |                  |              |              | at Standard Conditions SCFM            | Qsd =     | 13183      |  |
| 7                                              |                  |              |              |                                        |           |            |  |
| 8                                              |                  |              |              | Wet Volumetric Flue Gas Flow Rate      |           |            |  |
| E-1                                            |                  |              |              | at Stack Conditions ACFM               | Qaw =     | 15197      |  |
| 2                                              |                  |              |              |                                        |           |            |  |
| 3                                              |                  |              |              | Wet Volumetric Gas Flow Rate           |           |            |  |
| 4                                              |                  |              |              | at Standard Conditions WSCFH           | WSCFH =   | 826137     |  |
| 5                                              |                  |              |              |                                        |           |            |  |
| 6                                              |                  |              |              | LKCH                                   |           |            |  |
| 7                                              |                  |              |              | Pre                                    | 4-3       | good       |  |
| 8                                              |                  |              |              | Post                                   | 5-5       | good       |  |
| 0                                              |                  |              |              |                                        |           |            |  |
| 0                                              |                  |              |              |                                        |           |            |  |

|                                                |                  |       |  |                                        |            |            |  |
|------------------------------------------------|------------------|-------|--|----------------------------------------|------------|------------|--|
| Air Control Techniques EPA Method 2 Data Sheet |                  |       |  | ACT Job Number                         |            | 1911       |  |
| Client                                         | Enviva           |       |  | ACT Run Number                         |            | 11         |  |
| Plant                                          | Wiggins          |       |  | Date                                   |            | 10/11/2001 |  |
| City/State                                     | Wiggins, MS      |       |  | Gauge ID                               |            | 909033     |  |
| Location                                       | Dry Hammermill 2 |       |  | Pitot ID                               |            | 4Pext      |  |
| Averages                                       | 2.308            | 128.2 |  | Thermocouple ID                        |            | TC25       |  |
|                                                | Delta P          | Temp  |  |                                        |            |            |  |
| Point No.                                      | In Water         | Deg F |  |                                        |            |            |  |
| A-1                                            | 2.200            | 124   |  | Oxygen %                               | 20.9       |            |  |
| 2                                              | 2.150            | 127   |  |                                        |            |            |  |
| 3                                              | 2.000            | 129   |  | Carbon Dioxide %                       | 0          |            |  |
| 4                                              | 2.100            | 129   |  |                                        |            |            |  |
| 5                                              | 2.000            | 129   |  | Moisture %                             | 4.18       |            |  |
| 6                                              | 2.600            | 130   |  |                                        |            |            |  |
| 7                                              | 2.600            | 130   |  | Stack Area sq.in.                      | 380.132717 |            |  |
| 8                                              | 2.600            | 129   |  |                                        |            |            |  |
| B-1                                            | 1.800            | 129   |  | Pbar                                   | 29.80      |            |  |
| 2                                              | 2.200            | 127   |  |                                        |            |            |  |
| 3                                              | 2.200            | 128   |  | Static Pressure                        | 1.4        |            |  |
| 4                                              | 2.300            | 128   |  |                                        |            |            |  |
| 5                                              | 2.600            | 128   |  | Pitot Coef.                            | 0.84       |            |  |
| 6                                              | 2.500            | 128   |  |                                        |            |            |  |
| 7                                              | 2.600            | 128   |  | Start Time                             | 1917       |            |  |
| 8                                              | 2.600            | 128   |  |                                        |            |            |  |
| 0                                              |                  |       |  | Stop Time                              | 1923       |            |  |
| 2                                              |                  |       |  |                                        |            |            |  |
| 3                                              |                  |       |  | Absolute Gas Pressure inches water     | Ps =       | 29.90      |  |
| 4                                              |                  |       |  |                                        |            |            |  |
| 5                                              |                  |       |  | Dry Mole Fraction of Gas               | Mfd =      | 0.95816    |  |
| 6                                              |                  |       |  |                                        |            |            |  |
| 7                                              |                  |       |  | Dry Molecular Weight of Gas lb/lb Mole | Md =       | 28.84      |  |
| 8                                              |                  |       |  |                                        |            |            |  |
| D-1                                            |                  |       |  | Wet Molecular Weight of Gas lb/lb Mole | Ms =       | 28.38      |  |
| 2                                              |                  |       |  |                                        |            |            |  |
| 3                                              |                  |       |  | Average Gas Velocity ft/sec            | vs =       | 90.82      |  |
| 4                                              |                  |       |  |                                        |            |            |  |
| 5                                              |                  |       |  | Dry Volumetric Gas Flow Rate           |            |            |  |
| 6                                              |                  |       |  | at Standard Conditions SCFM            | Qsd =      | 12366      |  |
| 7                                              |                  |       |  |                                        |            |            |  |
| 8                                              |                  |       |  | Wet Volumetric Flue Gas Flow Rate      |            |            |  |
| E-1                                            |                  |       |  | at Stack Conditions ACFM               | Qaw =      | 14385      |  |
| 2                                              |                  |       |  |                                        |            |            |  |
| 3                                              |                  |       |  | Wet Volumetric Gas Flow Rate           |            |            |  |
| 4                                              |                  |       |  | at Standard Conditions WSCFH           | WSCFH =    | 774351     |  |
| 5                                              |                  |       |  |                                        |            |            |  |
| 6                                              |                  |       |  | LKCH                                   |            |            |  |
| 7                                              |                  |       |  | Pre                                    | 4-3        | good       |  |
| 8                                              |                  |       |  | Post                                   | 5-5        | good       |  |
| 0                                              |                  |       |  |                                        |            |            |  |
| 0                                              |                  |       |  |                                        |            |            |  |

|                                                |                  |       |  |                                        |         |             |  |
|------------------------------------------------|------------------|-------|--|----------------------------------------|---------|-------------|--|
| Air Control Techniques EPA Method 2 Data Sheet |                  |       |  | ACT Job Number                         |         | 1911        |  |
| Client                                         | Enviva           |       |  | ACT Run Number                         |         | 12          |  |
| Plant                                          | Wiggins          |       |  | Date                                   |         | 10/11/2013  |  |
| City/State                                     | Wiggins, MS      |       |  | Gauge ID                               |         | 909033      |  |
| Location                                       | Dry Hammermill 2 |       |  | Pitot ID                               |         | 4Pext       |  |
| Averages                                       | 2.618            | 116.4 |  | Thermocouple ID                        |         | TC25        |  |
|                                                | Delta P          | Temp  |  |                                        |         |             |  |
| Point No.                                      | In Water         | Deg F |  |                                        |         |             |  |
| A-1                                            | 2.700            | 114   |  | Oxygen %                               |         | 20.9        |  |
| 2                                              | 2.700            | 116   |  |                                        |         |             |  |
| 3                                              | 2.700            | 116   |  | Carbon Dioxide %                       |         | 0           |  |
| 4                                              | 2.500            | 117   |  |                                        |         |             |  |
| 5                                              | 2.800            | 117   |  | Moisture %                             |         | 4.18        |  |
| 6                                              | 2.800            | 118   |  |                                        |         |             |  |
| 7                                              | 3.000            | 117   |  | Stack Area sq.in.                      |         | 380.1327167 |  |
| 8                                              | 2.900            | 116   |  |                                        |         |             |  |
| B-1                                            | 3.000            | 117   |  | Pbar                                   |         | 29.80       |  |
| 2                                              | 2.900            | 116   |  |                                        |         |             |  |
| 3                                              | 2.600            | 117   |  | Static Pressure                        |         | 1.4         |  |
| 4                                              | 2.500            | 116   |  |                                        |         |             |  |
| 5                                              | 2.300            | 116   |  | Pitot Coef.                            |         | 0.84        |  |
| 6                                              | 2.300            | 116   |  |                                        |         |             |  |
| 7                                              | 2.100            | 116   |  | Start Time                             |         | 2038        |  |
| 8                                              | 2.200            | 117   |  |                                        |         |             |  |
| 0                                              |                  |       |  | Stop Time                              |         | 2043        |  |
| 2                                              |                  |       |  |                                        |         |             |  |
| 3                                              |                  |       |  | Absolute Gas Pressure inches water     | Ps =    | 29.90       |  |
| 4                                              |                  |       |  |                                        |         |             |  |
| 5                                              |                  |       |  | Dry Mole Fraction of Gas               | Mfd =   | 0.95816     |  |
| 6                                              |                  |       |  |                                        |         |             |  |
| 7                                              |                  |       |  | Dry Molecular Weight of Gas lb/lb Mole | Md =    | 28.84       |  |
| 8                                              |                  |       |  |                                        |         |             |  |
| D-1                                            |                  |       |  | Wet Molecular Weight of Gas lb/lb Mole | Ms =    | 28.38       |  |
| 2                                              |                  |       |  |                                        |         |             |  |
| 3                                              |                  |       |  | Average Gas Velocity ft/sec            | vs =    | 95.74       |  |
| 4                                              |                  |       |  |                                        |         |             |  |
| 5                                              |                  |       |  | Dry Volumetric Gas Flow Rate           |         |             |  |
| 6                                              |                  |       |  | at Standard Conditions SCFM            | Qsd =   | 13303       |  |
| 7                                              |                  |       |  |                                        |         |             |  |
| 8                                              |                  |       |  | Wet Volumetric Flue Gas Flow Rate      |         |             |  |
| E-1                                            |                  |       |  | at Stack Conditions ACFM               | Qaw =   | 15165       |  |
| 2                                              |                  |       |  |                                        |         |             |  |
| 3                                              |                  |       |  | Wet Volumetric Gas Flow Rate           |         |             |  |
| 4                                              |                  |       |  | at Standard Conditions WSCFH           | WSCFH = | 833051      |  |
| 5                                              |                  |       |  |                                        |         |             |  |
| 6                                              |                  |       |  | LKCH                                   |         |             |  |
| 7                                              |                  |       |  | Pre                                    | 4-3     | good        |  |
| 8                                              |                  |       |  | Post                                   | 5-5     | good        |  |
| 0                                              |                  |       |  |                                        |         |             |  |
| 0                                              |                  |       |  |                                        |         |             |  |

Air Control Techniques, PC: Emissions Calculations

| Enviva, Wiggins, MS             |                            | Job 1911            |  | Pellet Mill 2 | Pellet Mill 2 | Pellet Mill 2 | Pellet Mill 1 | Pellet Mill 1 | Pellet Mill 1 |
|---------------------------------|----------------------------|---------------------|--|---------------|---------------|---------------|---------------|---------------|---------------|
|                                 |                            |                     |  | Cooler        | Cooler        | Cooler        | Cooler        | Cooler        | Cooler        |
| <b>PARAMETER</b>                |                            | <b>NOMENCLATURE</b> |  | 7             | 8             | 9             | 13            | 14            | 15            |
| Sampling Location               |                            |                     |  | Pellet Mill 2 | Pellet Mill 2 | Pellet Mill 2 | Pellet Mill 1 | Pellet Mill 1 | Pellet Mill 1 |
|                                 |                            |                     |  | Cooler        | Cooler        | Cooler        | Cooler        | Cooler        | Cooler        |
| Date                            |                            |                     |  | 10/11/2013    | 10/11/2013    | 10/11/2013    | 10/12/2013    | 10/12/2013    | 10/12/2013    |
| Run Time                        | θ                          |                     |  | 60            | 60            | 60            | 60            | 60            | 60            |
| Nozzle Diameter                 | inches                     |                     |  | N/A           | N/A           | N/A           | N/A           | N/A           | N/A           |
| Stack Area                      | As - sq. ft.               |                     |  | 2.4           | 2.4           | 2.4           | 5.81          | 5.8           | 5.8           |
| Pitot Tube Coefficient          | Cp                         |                     |  | 0.84          | 0.84          | 0.84          | 0.84          | 0.84          | 0.84          |
| Meter Calibration Factor        | Y                          |                     |  | 0.9828        | 0.9828        | 0.9828        | 0.9828        | 0.9828        | 0.9828        |
| Barometric Pressure, inches Hg  | Bp - in Hg                 |                     |  | 29.80         | 29.80         | 29.80         | 29.90         | 29.90         | 29.90         |
| Static Pressure                 | Pg - in. H <sub>2</sub> O  |                     |  | -1.2          | -1.2          | -1.2          | -0.4          | -0.4          | -0.4          |
| Stack Pressure                  | Ps                         |                     |  | 29.71         | 29.71         | 29.71         | 29.87         | 29.87         | 29.87         |
| Meter Box Pressure Differential | Δ H - in. H <sub>2</sub> O |                     |  | 1.00          | 1.00          | 1             | 1.00          | 1.00          | 1.00          |
| Average Velocity Head           | Δ p - in. H <sub>2</sub> O |                     |  | 2.293         | 2.102         | 2.108         | 0.654         | 0.644         | 0.634         |
| Volume of Gas Sampled           | Vm - cu. ft.               |                     |  | 34.310        | 34.423        | 33.681        | 33.818        | 35.845        | 34.567        |
| Dry Gas Meter Temperature       | Tm - °F                    |                     |  | 87.3          | 89.3          | 83.8          | 71.8          | 82.5          | 89.0          |
| Stack Temperature               | Ts - °F                    |                     |  | 148.9         | 143.2         | 152.3         | 82.3          | 94.8          | 97.7          |
| Liquid Collected                | Grams                      |                     |  | 35.2          | 33.5          | 32.4          | 24.3          | 27.8          | 19.9          |
| Carbon Dioxide                  | % CO <sub>2</sub>          |                     |  | 0             | 0             | 0             | 0             | 0             | 0             |
| Oxygen                          | % O <sub>2</sub>           |                     |  | 20.9          | 20.9          | 20.9          | 20.9          | 20.9          | 20.9          |
| Carbon Monoxide                 | % CO                       |                     |  | 0             | 0             | 0             | 0             | 0             | 0             |
| Nitrogen                        | % N <sub>2</sub>           |                     |  | 79.1          | 79.1          | 79.1          | 79.1          | 79.1          | 79.1          |
| Volume of Gas Sampled, Dry      | Vmstd - cu. ft.            |                     |  | 32.483        | 32.472        | 32.093        | 33.061        | 34.348        | 32.731        |
| Volume of Water Vapor           | Vwstd - cu. ft.            |                     |  | 1.660         | 1.580         | 1.528         | 1.146         | 1.311         | 0.938         |
| Moisture Content                | % H <sub>2</sub> O         |                     |  | 4.86          | 4.64          | 4.54          | 3.35          | 3.68          | 2.79          |
| Saturation Moisture             | % H <sub>2</sub> O         |                     |  | 24.8          | 21.4          | 26.9          | 3.7           | 5.5           | 6.0           |
| Dry Mole Fraction               | Mfd                        |                     |  | 0.951         | 0.954         | 0.955         | 0.967         | 0.963         | 0.972         |
| Gas Molecular Weight, Dry       | Md                         |                     |  | 28.84         | 28.84         | 28.84         | 28.84         | 28.84         | 28.84         |
| Gas Molecular Weight, Wet       | Ms                         |                     |  | 28.31         | 28.33         | 28.34         | 28.47         | 28.44         | 28.53         |
| Gas Velocity                    | vs - ft./sec.              |                     |  | 92.52         | 88.13         | 88.91         | 46.36         | 46.58         | 46.26         |
| Volumetric Air Flow, Actual     | Qaw - ACFM                 |                     |  | 13,352        | 12,718        | 12,831        | 16,168        | 16,246        | 16,134        |
| Volumetric Air Flow, Standard   | Qsd - DSCFM                |                     |  | 10,938        | 10,543        | 10,488        | 15,189        | 14,870        | 14,825        |



**Method 1 - Air Control Techniques, P.C.**

Date

10/12/2013

|                                                   |                      |
|---------------------------------------------------|----------------------|
| Client                                            | Enviva               |
| Job #                                             | 1911                 |
| Plant Name                                        | Wiggins              |
| State                                             | Mississippi          |
| City                                              | Wiggins              |
| Sampling Location                                 | Pellet Mill 1 Cooler |
| No. of Ports Available                            | 6                    |
| No. of Ports Used                                 | 4                    |
| Port Inside Diameter, Inches                      | 3                    |
| Distance From Far Wall To Outside Of Port, Inches | 30.5                 |
| Nipple Length And/Or Wall Thickness, Inches       | 3.5                  |
| Depth Of Stack Or Duct, Inches                    | 27                   |
| Stack Or Duct Width (if rectangular), Inches      | 31                   |
| Equiv. Diameter = 2DW/(D+W), Inches               | 28.86207             |
| Stack/Duct Area, Square Feet                      | 5.8                  |
| (□ x R <sup>2</sup> or L x W)                     |                      |
|                                                   | Upstream Downstream  |
| Distance to Flow Disturbances, Inches             | 72 48                |
| Diameters                                         | 2.49 1.66            |

2 diff nipples probe marked to inside of port

| Point Location Data |                 |                           |                               |
|---------------------|-----------------|---------------------------|-------------------------------|
| Point               | % of Duct Depth | Distance From Inside Wall | Distance From Outside of Port |
| 1                   | 12.5            | 3 3/8                     | 6 7/8                         |
| 2                   | 37.5            | 10 1/8                    | 13 5/8                        |
| 3                   | 62.5            | 16 7/8                    | 20 3/8                        |
| 4                   | 87.5            | 23 5/8                    | 27 1/8                        |
| 5                   |                 |                           |                               |
| 6                   |                 |                           |                               |
| 7                   |                 |                           |                               |
| 8                   |                 |                           |                               |
| 9                   |                 |                           |                               |
| 10                  |                 |                           |                               |
| 11                  |                 |                           |                               |
| 12                  |                 |                           |                               |
| 13                  |                 |                           |                               |
| 14                  |                 |                           |                               |
| 15                  |                 |                           |                               |
| 16                  |                 |                           |                               |
| 17                  |                 |                           |                               |
| 18                  |                 |                           |                               |
| 19                  |                 |                           |                               |
| 20                  |                 |                           |                               |
| 21                  |                 |                           |                               |
| 22                  |                 |                           |                               |
| 23                  |                 |                           |                               |
| 24                  |                 |                           |                               |
| 25                  |                 |                           |                               |

| Note: If more than 8 and 2 diameters and if duct dia. is less than 24" use 8 or 9 points. |           |      |             |
|-------------------------------------------------------------------------------------------|-----------|------|-------------|
| Velocity                                                                                  | Diameters |      | Particulate |
|                                                                                           | UP        | Down |             |
| 12                                                                                        | 8         | 2    | 12          |
| 12                                                                                        | 7         | 1.75 | 12          |
| 12                                                                                        | 6         | 1.5  | 16          |
| 16                                                                                        | 5         | 1.25 | 20          |
| 16                                                                                        | 2         | 0.5  | 24 or 25    |

| Location of Points in Circular Stacks or Ducts |      |      |      |      |      |      |      |      |      |      |      |
|------------------------------------------------|------|------|------|------|------|------|------|------|------|------|------|
|                                                | 4    | 6    | 8    | 10   | 12   | 14   | 16   | 18   | 20   | 22   | 24   |
| 1                                              | 6.7  | 4.4  | 3.2  | 2.6  | 2.1  | 1.8  | 1.6  | 1.4  | 1.3  | 1.1  | 1.1  |
| 2                                              | 25.0 | 14.6 | 10.6 | 8.2  | 6.7  | 5.7  | 4.9  | 4.4  | 3.9  | 3.5  | 3.2  |
| 3                                              | 75.0 | 29.6 | 19.4 | 14.6 | 11.8 | 9.9  | 8.5  | 7.5  | 6.7  | 6.0  | 5.5  |
| 4                                              | 93.3 | 70.4 | 32.3 | 22.6 | 17.7 | 14.6 | 12.5 | 10.9 | 9.7  | 8.7  | 7.9  |
| 5                                              |      | 85.4 | 67.7 | 34.2 | 25.0 | 20.1 | 16.9 | 14.6 | 12.9 | 11.6 | 10.5 |
| 6                                              |      | 95.6 | 80.6 | 65.8 | 35.6 | 26.9 | 22.0 | 18.8 | 16.5 | 14.6 | 13.2 |
| 7                                              |      |      | 89.5 | 77.4 | 64.4 | 36.6 | 28.3 | 23.6 | 20.4 | 18.0 | 16.1 |
| 8                                              |      |      | 96.8 | 85.4 | 75.0 | 63.4 | 37.5 | 29.6 | 25.0 | 21.8 | 19.4 |
| 9                                              |      |      |      | 91.8 | 82.3 | 73.1 | 62.5 | 38.2 | 30.6 | 26.2 | 23.0 |
| 10                                             |      |      |      | 97.4 | 88.2 | 79.9 | 71.7 | 61.8 | 38.8 | 31.5 | 27.2 |
| 11                                             |      |      |      |      | 93.3 | 85.4 | 78.0 | 70.4 | 61.2 | 39.3 | 32.3 |
| 12                                             |      |      |      |      | 97.9 | 90.1 | 83.1 | 76.4 | 69.4 | 60.7 | 39.8 |
| 13                                             |      |      |      |      |      | 94.3 | 87.6 | 81.2 | 75.0 | 68.5 | 60.2 |
| 14                                             |      |      |      |      |      | 98.2 | 91.5 | 85.4 | 79.6 | 73.8 | 67.7 |
| 15                                             |      |      |      |      |      |      | 95.1 | 89.1 | 83.5 | 78.2 | 72.8 |
| 16                                             |      |      |      |      |      |      | 98.4 | 92.5 | 87.1 | 82.0 | 77.0 |
| 17                                             |      |      |      |      |      |      |      | 95.6 | 90.3 | 85.4 | 80.6 |
| 18                                             |      |      |      |      |      |      |      | 98.6 | 93.3 | 88.4 | 83.9 |
| 19                                             |      |      |      |      |      |      |      |      | 96.1 | 91.3 | 86.8 |
| 20                                             |      |      |      |      |      |      |      |      | 98.7 | 94.0 | 89.5 |
| 21                                             |      |      |      |      |      |      |      |      |      | 96.5 | 92.1 |
| 22                                             |      |      |      |      |      |      |      |      |      | 98.9 | 94.5 |
| 23                                             |      |      |      |      |      |      |      |      |      |      | 96.8 |
| 24                                             |      |      |      |      |      |      |      |      |      |      | 98.9 |

| Location of Points in Rectangular Stacks or Ducts |    |      |      |      |      |      |      |      |      |      |      |
|---------------------------------------------------|----|------|------|------|------|------|------|------|------|------|------|
|                                                   | 2  | 3    | 4    | 5    | 6    | 7    | 8    | 9    | 10   | 11   | 12   |
| 1                                                 | 25 | 16.7 | 12.5 | 10.0 | 8.3  | 7.1  | 6.3  | 5.6  | 5.0  | 4.5  | 4.2  |
| 2                                                 | 75 | 50   | 37.5 | 30.0 | 25   | 21.4 | 18.8 | 16.7 | 15.0 | 13.6 | 12.5 |
| 3                                                 |    | 83.3 | 62.5 | 50.0 | 41.7 | 35.7 | 31.3 | 27.8 | 25.0 | 22.7 | 20.8 |
| 4                                                 |    |      | 87.5 | 70.0 | 58.3 | 50   | 43.8 | 28.9 | 35.0 | 31.8 | 29.2 |
| 5                                                 |    |      |      | 90.0 | 75   | 64.3 | 56.3 | 50   | 45.0 | 40.9 | 37.5 |
| 6                                                 |    |      |      |      | 91.7 | 78.6 | 68.8 | 61.1 | 55.0 | 50   | 45.8 |
| 7                                                 |    |      |      |      |      | 92.9 | 81.3 | 72.2 | 65.0 | 59.1 | 54.2 |
| 8                                                 |    |      |      |      |      |      | 93.8 | 83.3 | 75.0 | 68.2 | 62.5 |
| 9                                                 |    |      |      |      |      |      |      | 94.4 | 85.0 | 77.3 | 70.8 |
| 10                                                |    |      |      |      |      |      |      |      | 95.0 | 86.4 | 79.2 |
| 11                                                |    |      |      |      |      |      |      |      |      | 95.5 | 87.5 |
| 12                                                |    |      |      |      |      |      |      |      |      |      | 95.8 |

0.0000 - 0.0625 - 0    0.5625 - 0.6875 - 5/8  
0.0625 - 0.1875 - 1/8    0.6875 - 0.8125 - 3/4  
0.1875 - 0.3125 - 1/4    0.8125 - 0.9375 - 7/8  
0.3125 - 0.4375 - 3/8    0.9375 - 1.0000 - 1  
0.4375 - 0.5625 - 1/2

Pellet Mill 1 Run 1

|                                                |                      |              |              |                                               |                |                |  |
|------------------------------------------------|----------------------|--------------|--------------|-----------------------------------------------|----------------|----------------|--|
| Air Control Techniques EPA Method 2 Data Sheet |                      |              |              | ACT Job Number                                |                | 1911           |  |
| Client                                         | Enviva               |              |              | ACT Run Number                                |                | 13             |  |
| Plant                                          | Wiggins              |              |              | Date                                          |                | 10/12/2013     |  |
| City/State                                     | Mississippi          |              |              | Gauge ID                                      |                | 909033         |  |
| Location                                       | Pellet Mill 1 Cooler |              |              | Pitot ID                                      |                | 4Pext          |  |
| <b>Averages</b>                                |                      | <b>0.654</b> | <b>82.3</b>  | Thermocouple ID                               |                | 4Pext          |  |
|                                                | <b>Delta P</b>       | <b>Temp</b>  |              |                                               |                |                |  |
| <b>Point No.</b>                               | <b>In Water</b>      | <b>Deg F</b> | <b>Angle</b> |                                               |                |                |  |
| <b>A-1</b>                                     | 0.380                | 78           | <b>0</b>     | <b>Oxygen %</b>                               | <b>20.9</b>    |                |  |
| <b>2</b>                                       | 0.340                | 79           | <b>0</b>     |                                               |                |                |  |
| <b>3</b>                                       | 0.330                | 79           | <b>0</b>     | <b>Carbon Dioxide %</b>                       | <b>0</b>       |                |  |
| <b>4</b>                                       | 0.340                | 77           | <b>2</b>     |                                               |                |                |  |
| <b>B-1</b>                                     | 0.680                | 82           | <b>8</b>     | <b>Moisture %</b>                             | <b>3.35</b>    |                |  |
| <b>2</b>                                       | 0.650                | 81           | <b>2</b>     |                                               |                |                |  |
| <b>3</b>                                       | 0.540                | 82           | <b>-5</b>    | <b>Stack Area sq.in.</b>                      | <b>837</b>     |                |  |
| <b>4</b>                                       | 0.570                | 82           | <b>3</b>     |                                               |                |                |  |
| <b>C-1</b>                                     | 0.680                | 84           | <b>-2</b>    | <b>Pbar</b>                                   | <b>29.90</b>   |                |  |
| <b>2</b>                                       | 0.700                | 84           | <b>-3</b>    |                                               |                |                |  |
| <b>3</b>                                       | 0.690                | 84           | <b>0</b>     | <b>Static Pressure</b>                        | <b>-0.4</b>    |                |  |
| <b>4</b>                                       | 0.710                | 84           | <b>3</b>     |                                               |                |                |  |
| <b>D-1</b>                                     | 1.050                | 85           | <b>0</b>     | <b>Pitot Coef.</b>                            | <b>0.84</b>    |                |  |
| <b>2</b>                                       | 1.050                | 85           | <b>-2</b>    |                                               |                |                |  |
| <b>3</b>                                       | 1.050                | 85           | <b>-1</b>    | <b>Start Time</b>                             | <b>830</b>     |                |  |
| <b>4</b>                                       | 1.100                | 86           | <b>2</b>     |                                               |                |                |  |
| <b>0</b>                                       |                      |              |              | <b>Stop Time</b>                              | <b>847</b>     |                |  |
| <b>0</b>                                       |                      |              |              |                                               |                |                |  |
| <b>0</b>                                       |                      |              |              | <b>Absolute Gas Pressure inches water</b>     | <b>Ps =</b>    | <b>29.87</b>   |  |
| <b>0</b>                                       |                      |              |              |                                               |                |                |  |
| <b>0</b>                                       |                      |              |              | <b>Dry Mole Fraction of Gas</b>               | <b>Mfd =</b>   | <b>0.96651</b> |  |
| <b>0</b>                                       |                      |              |              |                                               |                |                |  |
| <b>0</b>                                       |                      |              |              | <b>Dry Molecular Weight of Gas lb/lb Mole</b> | <b>Md =</b>    | <b>28.84</b>   |  |
| <b>0</b>                                       |                      |              |              |                                               |                |                |  |
| <b>0</b>                                       |                      |              |              | <b>Wet Molecular Weight of Gas lb/lb Mole</b> | <b>Ms =</b>    | <b>28.47</b>   |  |
| <b>0</b>                                       |                      |              |              |                                               |                |                |  |
| <b>0</b>                                       |                      |              |              | <b>Average Gas Velocity ft/sec</b>            | <b>vs =</b>    | <b>46.36</b>   |  |
| <b>0</b>                                       |                      |              |              |                                               |                |                |  |
| <b>0</b>                                       |                      |              |              | <b>Dry Volumetric Gas Flow Rate</b>           |                |                |  |
| <b>0</b>                                       |                      |              |              | <b>at Standard Conditions SCFM</b>            | <b>Qsd =</b>   | <b>15189</b>   |  |
| <b>0</b>                                       |                      |              |              |                                               |                |                |  |
| <b>0</b>                                       |                      |              |              | <b>Wet Volumetric Flue Gas Flow Rate</b>      |                |                |  |
| <b>0</b>                                       |                      |              |              | <b>at Stack Conditions ACFM</b>               | <b>Qaw =</b>   | <b>16168</b>   |  |
| <b>0</b>                                       |                      |              |              |                                               |                |                |  |
| <b>0</b>                                       |                      |              |              | <b>Wet Volumetric Gas Flow Rate</b>           |                |                |  |
| <b>0</b>                                       |                      |              |              | <b>at Standard Conditions WSCFH</b>           | <b>WSCFH =</b> | <b>942901</b>  |  |
| <b>0</b>                                       |                      |              |              |                                               |                |                |  |
| <b>0</b>                                       |                      |              |              | LKCH                                          |                |                |  |
| <b>0</b>                                       |                      |              |              | Pre                                           | 3-4            | good           |  |
| <b>0</b>                                       |                      |              |              | Post                                          | 5-3            | good           |  |
| <b>#REF!</b>                                   |                      |              |              |                                               |                |                |  |
| <b>#REF!</b>                                   |                      |              |              |                                               |                |                |  |

Pellet Mill 1 Run 2

|                                                |                      |              |             |                                               |     |                |                |
|------------------------------------------------|----------------------|--------------|-------------|-----------------------------------------------|-----|----------------|----------------|
| Air Control Techniques EPA Method 2 Data Sheet |                      |              |             | ACT Job Number                                |     | 1911           |                |
| Client                                         | Enviva               |              |             | ACT Run Number                                |     | 14             |                |
| Plant                                          | Wiggins              |              |             | Date                                          |     | 10/12/2013     |                |
| City/State                                     | Mississippi          |              |             | Gauge ID                                      |     | 909033         |                |
| Location                                       | Pellet Mill 1 Cooler |              |             | Pitot ID                                      |     | 4PEXT          |                |
| <b>Averages</b>                                |                      | <b>0.644</b> | <b>94.8</b> | Thermocouple ID                               |     | 4PEXT          |                |
|                                                | <b>Delta P</b>       | <b>Temp</b>  |             |                                               |     |                |                |
| <b>Point No.</b>                               | <b>In Water</b>      | <b>Deg F</b> |             |                                               |     |                |                |
| A-1                                            | 0.380                | 92           |             | <b>Oxygen %</b>                               |     | <b>20.9</b>    |                |
| 2                                              | 0.400                | 93           |             |                                               |     |                |                |
| 3                                              | 0.380                | 93           |             | <b>Carbon Dioxide %</b>                       |     | <b>0</b>       |                |
| 4                                              | 0.370                | 93           |             |                                               |     |                |                |
| B-1                                            | 0.530                | 94           |             | <b>Moisture %</b>                             |     | <b>3.68</b>    |                |
| 2                                              | 0.550                | 95           |             |                                               |     |                |                |
| 3                                              | 0.480                | 95           |             | <b>Stack Area sq.in.</b>                      |     | <b>837</b>     |                |
| 4                                              | 0.500                | 95           |             |                                               |     |                |                |
| C-1                                            | 0.670                | 95           |             | <b>Pbar</b>                                   |     | <b>29.90</b>   |                |
| 2                                              | 0.690                | 95           |             |                                               |     |                |                |
| 3                                              | 0.660                | 96           |             | <b>Static Pressure</b>                        |     | <b>-0.4</b>    |                |
| 4                                              | 0.680                | 96           |             |                                               |     |                |                |
| D-1                                            | 1.300                | 96           |             | <b>Pitot Coef.</b>                            |     | <b>0.84</b>    |                |
| 2                                              | 1.050                | 96           |             |                                               |     |                |                |
| 3                                              | 1.050                | 96           |             | <b>Start Time</b>                             |     | <b>1009</b>    |                |
| 4                                              | 1.050                | 96           |             |                                               |     |                |                |
| 0                                              |                      |              |             | <b>Stop Time</b>                              |     | <b>1015</b>    |                |
| 0                                              |                      |              |             |                                               |     |                |                |
| 0                                              |                      |              |             | <b>Absolute Gas Pressure inches water</b>     |     | <b>Ps =</b>    | <b>29.87</b>   |
| 0                                              |                      |              |             |                                               |     |                |                |
| 0                                              |                      |              |             | <b>Dry Mole Fraction of Gas</b>               |     | <b>Mfd =</b>   | <b>0.96324</b> |
| 0                                              |                      |              |             |                                               |     |                |                |
| 0                                              |                      |              |             | <b>Dry Molecular Weight of Gas lb/lb Mole</b> |     | <b>Md =</b>    | <b>28.84</b>   |
| 0                                              |                      |              |             |                                               |     |                |                |
| 0                                              |                      |              |             | <b>Wet Molecular Weight of Gas lb/lb Mole</b> |     | <b>Ms =</b>    | <b>28.44</b>   |
| 0                                              |                      |              |             |                                               |     |                |                |
| 0                                              |                      |              |             | <b>Average Gas Velocity ft/sec</b>            |     | <b>vs =</b>    | <b>46.58</b>   |
| 0                                              |                      |              |             |                                               |     |                |                |
| 0                                              |                      |              |             | <b>Dry Volumetric Gas Flow Rate</b>           |     |                |                |
| 0                                              |                      |              |             | <b>at Standard Conditions SCFM</b>            |     | <b>Qsd =</b>   | <b>14870</b>   |
| 0                                              |                      |              |             |                                               |     |                |                |
| 0                                              |                      |              |             | <b>Wet Volumetric Flue Gas Flow Rate</b>      |     |                |                |
| 0                                              |                      |              |             | <b>at Stack Conditions ACFM</b>               |     | <b>Qaw =</b>   | <b>16246</b>   |
| 0                                              |                      |              |             |                                               |     |                |                |
| 0                                              |                      |              |             | <b>Wet Volumetric Gas Flow Rate</b>           |     |                |                |
| 0                                              |                      |              |             | <b>at Standard Conditions WSCFH</b>           |     | <b>WSCFH =</b> | <b>926248</b>  |
| 0                                              |                      |              |             |                                               |     |                |                |
| 0                                              |                      |              |             | <b>LKCH</b>                                   |     |                |                |
| 0                                              |                      |              |             | <b>Pre</b>                                    | 3-4 | good           |                |
| 0                                              |                      |              |             | <b>Post</b>                                   | 5-3 | good           |                |
| #REF!                                          |                      |              |             |                                               |     |                |                |
| #REF!                                          |                      |              |             |                                               |     |                |                |

|                                                |  |                      |  |                                        |  |                |  |
|------------------------------------------------|--|----------------------|--|----------------------------------------|--|----------------|--|
| Air Control Techniques EPA Method 2 Data Sheet |  |                      |  | ACT Job Number                         |  | 1911           |  |
| Client                                         |  | Enviva               |  | ACT Run Number                         |  | 15             |  |
| Plant                                          |  | Wiggins              |  | Date                                   |  | 10/12/2013     |  |
| City/State                                     |  | Mississippi          |  | Gauge ID                               |  | 909033         |  |
| Location                                       |  | Pellet Mill 1 Cooler |  | Pitot ID                               |  | 4Pext          |  |
| Averages                                       |  | 0.634 97.7           |  | Thermocouple ID                        |  | 4Pext          |  |
|                                                |  | Delta P Temp         |  |                                        |  |                |  |
| Point No.                                      |  | In Water Deg F       |  |                                        |  |                |  |
| A-1                                            |  | 0.340 94             |  | Oxygen %                               |  | 20.9           |  |
| 2                                              |  | 0.290 96             |  |                                        |  |                |  |
| 3                                              |  | 0.280 97             |  | Carbon Dioxide %                       |  | 0              |  |
| 4                                              |  | 0.330 97             |  |                                        |  |                |  |
| B-1                                            |  | 0.530 98             |  | Moisture %                             |  | 2.79           |  |
| 2                                              |  | 0.540 98             |  |                                        |  |                |  |
| 3                                              |  | 0.500 98             |  | Stack Area sq.in.                      |  | 837            |  |
| 4                                              |  | 0.480 98             |  |                                        |  |                |  |
| C-1                                            |  | 0.730 98             |  | Pbar                                   |  | 29.90          |  |
| 2                                              |  | 0.740 98             |  |                                        |  |                |  |
| 3                                              |  | 0.670 98             |  | Static Pressure                        |  | -0.4           |  |
| 4                                              |  | 0.670 99             |  |                                        |  |                |  |
| D-1                                            |  | 1.400 98             |  | Pitot Coef.                            |  | 0.84           |  |
| 2                                              |  | 1.050 99             |  |                                        |  |                |  |
| 3                                              |  | 1.000 99             |  | Start Time                             |  | 1125           |  |
| 4                                              |  | 1.200 98             |  | Stop Time                              |  | '1134          |  |
| 0                                              |  |                      |  |                                        |  |                |  |
| 0                                              |  |                      |  | Absolute Gas Pressure inches water     |  | Ps = 29.87     |  |
| 0                                              |  |                      |  |                                        |  |                |  |
| 0                                              |  |                      |  | Dry Mole Fraction of Gas               |  | Mfd = 0.97213  |  |
| 0                                              |  |                      |  |                                        |  |                |  |
| 0                                              |  |                      |  | Dry Molecular Weight of Gas lb/lb Mole |  | Md = 28.84     |  |
| 0                                              |  |                      |  |                                        |  |                |  |
| 0                                              |  |                      |  | Wet Molecular Weight of Gas lb/lb Mole |  | Ms = 28.53     |  |
| 0                                              |  |                      |  |                                        |  |                |  |
| 0                                              |  |                      |  | Average Gas Velocity ft/sec            |  | vs = 46.26     |  |
| 0                                              |  |                      |  |                                        |  |                |  |
| 0                                              |  |                      |  | Dry Volumetric Gas Flow Rate           |  |                |  |
| 0                                              |  |                      |  | at Standard Conditions SCFM            |  | Qsd = 14825    |  |
| 0                                              |  |                      |  |                                        |  |                |  |
| 0                                              |  |                      |  | Wet Volumetric Flue Gas Flow Rate      |  |                |  |
| 0                                              |  |                      |  | at Stack Conditions ACFM               |  | Qaw = 16134    |  |
| 0                                              |  |                      |  |                                        |  |                |  |
| 0                                              |  |                      |  | Wet Volumetric Gas Flow Rate           |  |                |  |
| 0                                              |  |                      |  | at Standard Conditions WSCFH           |  | WSCFH = 915021 |  |
| 0                                              |  |                      |  |                                        |  |                |  |
| 0                                              |  |                      |  | LKCH                                   |  |                |  |
| 0                                              |  |                      |  | Pre                                    |  | 3-4 good       |  |
| 0                                              |  |                      |  | Post                                   |  | 5-3 good       |  |
| #REF!                                          |  |                      |  |                                        |  |                |  |
| #REF!                                          |  |                      |  |                                        |  |                |  |

**Method 1 - Air Control Techniques, P.C.**

Date

10/11/2013

Client Enviva  
Job # 1911  
Plant Name Wiggins  
State Mississippi  
City Wiggins  
Sampling Location Pellet Mill 2 Cooler

No. of Ports Available 2  
No. of Ports Used 2  
Port Inside Diameter, Inches 3  
Distance From Far Wall To Outside Of Port, Inches 21  
Nipple Length And/Or Wall Thickness, Inches 0  
Depth Of Stack Or Duct, Inches 21  
Stack Or Duct Width (if rectangular), Inches  
Equiv. Diameter = 2DW/(D+W), Inches 21  
Stack/Duct Area, Square Feet 2.4  
(□ x R<sup>2</sup> or L x W)  
Upstream Downstream  
Distance to Flow Disturbances, inches 51 9.5  
Diameters 2.43 0.45

2 diff nipples probe marked to inside of port

| Point Location Data |                    |                              |                                  |
|---------------------|--------------------|------------------------------|----------------------------------|
| Point               | % of Duct<br>Depth | Distance From<br>Inside Wall | Distance From<br>Outside of Port |
| 1                   | 3.2                | 0.672                        | 1                                |
| 2                   | 10.6               | 2.226                        | 2 1/4                            |
| 3                   | 19.4               | 4.074                        | 4 1/8                            |
| 4                   | 32.3               | 6.783                        | 6 3/4                            |
| 5                   | 67.7               | 14.217                       | 14 1/4                           |
| 6                   | 80.6               | 16.926                       | 16 7/8                           |
| 7                   | 89.5               | 18.795                       | 18 3/4                           |
| 8                   | 96.8               | 20.328                       | 20                               |
| 9                   |                    |                              |                                  |
| 10                  |                    |                              |                                  |
| 11                  |                    |                              |                                  |
| 12                  |                    |                              |                                  |
| 13                  |                    |                              |                                  |
| 14                  |                    |                              |                                  |
| 15                  |                    |                              |                                  |
| 16                  |                    |                              |                                  |
| 17                  |                    |                              |                                  |
| 18                  |                    |                              |                                  |
| 19                  |                    |                              |                                  |
| 20                  |                    |                              |                                  |
| 21                  |                    |                              |                                  |
| 22                  |                    |                              |                                  |
| 23                  |                    |                              |                                  |
| 24                  |                    |                              |                                  |
| 25                  |                    |                              |                                  |

| Note: If more than 8 and 2 diameters and if duct dia. is less than 24" use 8 or 9 points. |           |      |             |
|-------------------------------------------------------------------------------------------|-----------|------|-------------|
| Velocity                                                                                  | Diameters |      | Particulate |
|                                                                                           | UP        | Down |             |
| 12                                                                                        | 8         | 2    | 12          |
| 12                                                                                        | 7         | 1.75 | 12          |
| 12                                                                                        | 6         | 1.5  | 16          |
| 16                                                                                        | 5         | 1.25 | 20          |
| 16                                                                                        | 2         | 0.5  | 24 or 25    |

| Location of Points in Circular Stacks or Ducts |      |      |      |      |      |      |      |      |      |      |      |
|------------------------------------------------|------|------|------|------|------|------|------|------|------|------|------|
|                                                | 4    | 6    | 8    | 10   | 12   | 14   | 16   | 18   | 20   | 22   | 24   |
| 1                                              | 6.7  | 4.4  | 3.2  | 2.6  | 2.1  | 1.8  | 1.6  | 1.4  | 1.3  | 1.1  | 1.1  |
| 2                                              | 25.0 | 14.6 | 10.6 | 8.2  | 6.7  | 5.7  | 4.9  | 4.4  | 3.9  | 3.5  | 3.2  |
| 3                                              | 75.0 | 29.6 | 19.4 | 14.6 | 11.8 | 9.9  | 8.5  | 7.5  | 6.7  | 6.0  | 5.5  |
| 4                                              | 93.3 | 70.4 | 32.3 | 22.6 | 17.7 | 14.6 | 12.5 | 10.9 | 9.7  | 8.7  | 7.9  |
| 5                                              |      | 85.4 | 67.7 | 34.2 | 25.0 | 20.1 | 16.9 | 14.6 | 12.9 | 11.6 | 10.5 |
| 6                                              |      | 95.6 | 80.6 | 65.8 | 35.6 | 26.9 | 22.0 | 18.8 | 16.5 | 14.6 | 13.2 |
| 7                                              |      |      | 89.5 | 77.4 | 64.4 | 36.6 | 28.3 | 23.6 | 20.4 | 18.0 | 16.1 |
| 8                                              |      |      | 96.8 | 85.4 | 75.0 | 63.4 | 37.5 | 29.6 | 25.0 | 21.8 | 19.4 |
| 9                                              |      |      |      | 91.8 | 82.3 | 73.1 | 62.5 | 38.2 | 30.6 | 26.2 | 23.0 |
| 10                                             |      |      |      | 97.4 | 88.2 | 79.9 | 71.7 | 61.8 | 38.8 | 31.5 | 27.2 |
| 11                                             |      |      |      |      | 93.3 | 85.4 | 78.0 | 70.4 | 61.2 | 39.3 | 32.3 |
| 12                                             |      |      |      |      | 97.9 | 90.1 | 83.1 | 76.4 | 69.4 | 60.7 | 39.8 |
| 13                                             |      |      |      |      |      | 94.3 | 87.6 | 81.2 | 75.0 | 68.5 | 60.2 |
| 14                                             |      |      |      |      |      | 98.2 | 91.5 | 85.4 | 79.6 | 73.8 | 67.7 |
| 15                                             |      |      |      |      |      |      | 95.1 | 89.1 | 83.5 | 78.2 | 72.8 |
| 16                                             |      |      |      |      |      |      | 98.4 | 92.5 | 87.1 | 82.0 | 77.0 |
| 17                                             |      |      |      |      |      |      |      | 95.6 | 90.3 | 85.4 | 80.6 |
| 18                                             |      |      |      |      |      |      |      | 98.6 | 93.3 | 88.4 | 83.9 |
| 19                                             |      |      |      |      |      |      |      |      | 96.1 | 91.3 | 86.8 |
| 20                                             |      |      |      |      |      |      |      |      | 98.7 | 94.0 | 89.5 |
| 21                                             |      |      |      |      |      |      |      |      |      | 96.5 | 92.1 |
| 22                                             |      |      |      |      |      |      |      |      |      | 98.9 | 94.5 |
| 23                                             |      |      |      |      |      |      |      |      |      |      | 96.8 |
| 24                                             |      |      |      |      |      |      |      |      |      |      | 98.9 |

| Location of Points in Rectangular Stacks or Ducts |    |      |      |      |      |      |      |      |      |      |      |
|---------------------------------------------------|----|------|------|------|------|------|------|------|------|------|------|
|                                                   | 2  | 3    | 4    | 5    | 6    | 7    | 8    | 9    | 10   | 11   | 12   |
| 1                                                 | 25 | 16.7 | 12.5 | 10.0 | 8.3  | 7.1  | 6.3  | 5.6  | 5.0  | 4.5  | 4.2  |
| 2                                                 | 75 | 50   | 37.5 | 30.0 | 25   | 21.4 | 18.8 | 16.7 | 15.0 | 13.6 | 12.5 |
| 3                                                 |    | 83.3 | 62.5 | 50.0 | 41.7 | 35.7 | 31.3 | 27.8 | 25.0 | 22.7 | 20.8 |
| 4                                                 |    |      | 87.5 | 70.0 | 58.3 | 50   | 43.8 | 28.9 | 35.0 | 31.8 | 29.2 |
| 5                                                 |    |      |      | 90.0 | 75   | 64.3 | 56.3 | 50   | 45.0 | 40.9 | 37.5 |
| 6                                                 |    |      |      |      | 91.7 | 78.6 | 68.8 | 61.1 | 55.0 | 50   | 45.8 |
| 7                                                 |    |      |      |      |      | 92.9 | 81.3 | 72.2 | 65.0 | 59.1 | 54.2 |
| 8                                                 |    |      |      |      |      |      | 93.8 | 83.3 | 75.0 | 68.2 | 62.5 |
| 9                                                 |    |      |      |      |      |      |      | 94.4 | 85.0 | 77.3 | 70.8 |
| 10                                                |    |      |      |      |      |      |      |      | 95.0 | 86.4 | 79.2 |
| 11                                                |    |      |      |      |      |      |      |      |      | 95.5 | 87.5 |
| 12                                                |    |      |      |      |      |      |      |      |      |      | 95.8 |

0.0000 - 0.0625 - 0    0.5625 - 0.6875 - 5/8  
0.0625 - 0.1875 - 1/8    0.6875 - 0.8125 - 3/4  
0.1875 - 0.3125 - 1/4    0.8125 - 0.9375 - 7/8  
0.3125 - 0.4375 - 3/8    0.9375 - 1.0000 - 1  
0.4375 - 0.5625 - 1/2

Pellet Mill 2 Cooler Run 1

|                                                |                      |       |       |                                        |            |            |  |
|------------------------------------------------|----------------------|-------|-------|----------------------------------------|------------|------------|--|
| Air Control Techniques EPA Method 2 Data Sheet |                      |       |       | ACT Job Number                         |            | 1911       |  |
| Client                                         | Enviva               |       |       | ACT Run Number                         |            | 7          |  |
| Plant                                          | Wiggins              |       |       | Date                                   |            | 10/11/2013 |  |
| City/State                                     | Mississippi          |       |       | Gauge ID                               |            | 909033     |  |
| Location                                       | Pellet Mill 2 Cooler |       |       | Pitot ID                               |            | 4PEXT      |  |
| Averages                                       | 2.293                | 148.9 |       | Thermocouple ID                        |            | 4PEXT      |  |
|                                                | Delta P              | Temp  |       |                                        |            |            |  |
| Point No.                                      | In Water             | Deg F | Angle |                                        |            |            |  |
| A-1                                            | 1.800                | 150   | -2    | Oxygen %                               | 20.9       |            |  |
| 2                                              | 2.400                | 153   | -5    |                                        |            |            |  |
| 3                                              | 2.800                | 150   | -8    | Carbon Dioxide %                       | 0          |            |  |
| 4                                              | 2.900                | 150   | -4    |                                        |            |            |  |
| 5                                              | 2.800                | 150   | 6     | Moisture %                             | 4.86       |            |  |
| 6                                              | 2.500                | 150   | 5     |                                        |            |            |  |
| 7                                              | 2.300                | 149   | -2    | Stack Area sq.in.                      | 346.360595 |            |  |
| 8                                              | 1.900                | 144   | -2    |                                        |            |            |  |
| B-1                                            | 2.300                | 142   | 8     | Pbar                                   | 29.80      |            |  |
| 2                                              | 2.300                | 147   | 6     |                                        |            |            |  |
| 3                                              | 2.500                | 149   | 7     | Static Pressure                        | -1.2       |            |  |
| 4                                              | 2.500                | 149   | 6     |                                        |            |            |  |
| 5                                              | 2.200                | 150   | -5    | Pitot Coef.                            | 0.84       |            |  |
| 6                                              | 2.100                | 150   | -4    |                                        |            |            |  |
| 7                                              | 1.900                | 150   | -2    | Start Time                             | 1315       |            |  |
| 8                                              | 1.700                | 150   | -7    |                                        |            |            |  |
| #REF!                                          |                      |       |       | Stop Time                              | 1335       |            |  |
| #REF!                                          |                      |       |       |                                        |            |            |  |
| #REF!                                          |                      |       |       | Absolute Gas Pressure inches water     | Ps =       | 29.71      |  |
| #REF!                                          |                      |       |       |                                        |            |            |  |
| #REF!                                          |                      |       |       | Dry Mole Fraction of Gas               | Mfd =      | 0.95139    |  |
| #REF!                                          |                      |       |       |                                        |            |            |  |
| #REF!                                          |                      |       |       | Dry Molecular Weight of Gas lb/lb Mole | Md =       | 28.84      |  |
| #REF!                                          |                      |       |       |                                        |            |            |  |
| #REF!                                          |                      |       |       | Wet Molecular Weight of Gas lb/lb Mole | Ms =       | 28.31      |  |
| #REF!                                          |                      |       |       |                                        |            |            |  |
| #REF!                                          |                      |       |       | Average Gas Velocity ft/sec            | vs =       | 92.52      |  |
| #REF!                                          |                      |       |       |                                        |            |            |  |
| #REF!                                          |                      |       |       | Dry Volumetric Gas Flow Rate           |            |            |  |
| #REF!                                          |                      |       |       | at Standard Conditions SCFM            | Qsd =      | 10938      |  |
| #REF!                                          |                      |       |       |                                        |            |            |  |
| #REF!                                          |                      |       |       | Wet Volumetric Flue Gas Flow Rate      |            |            |  |
| #REF!                                          |                      |       |       | at Stack Conditions ACFM               | Qaw =      | 13352      |  |
| #REF!                                          |                      |       |       |                                        |            |            |  |
| #REF!                                          |                      |       |       | Wet Volumetric Gas Flow Rate           |            |            |  |
| #REF!                                          |                      |       |       | at Standard Conditions WSCFH           | WSCFH =    | 689797     |  |
| #REF!                                          |                      |       |       |                                        |            |            |  |
| #REF!                                          |                      |       |       | LKCH                                   |            |            |  |
| #REF!                                          |                      |       |       | Pre                                    | 3-4        | good       |  |
| #REF!                                          |                      |       |       | Post                                   | 5-3        | good       |  |
| #REF!                                          |                      |       |       |                                        |            |            |  |
| #REF!                                          |                      |       |       |                                        |            |            |  |

Pellet Mill 2 Cooler Run 2

|                                                |                      |       |  |                                        |            |            |  |
|------------------------------------------------|----------------------|-------|--|----------------------------------------|------------|------------|--|
| Air Control Techniques EPA Method 2 Data Sheet |                      |       |  | ACT Job Number                         |            | 1911       |  |
| Client                                         | Enviva               |       |  | ACT Run Number                         |            | 8          |  |
| Plant                                          | Wiggins              |       |  | Date                                   |            | 10/11/2013 |  |
| City/State                                     | Mississippi          |       |  | Gauge ID                               |            | 909033     |  |
| Location                                       | Pellet Mill 2 Cooler |       |  | Pitot ID                               |            | 4PEXT      |  |
| Averages                                       | 2.102                | 143.2 |  | Thermocouple ID                        |            | 4PEXT      |  |
|                                                | Delta P              | Temp  |  |                                        |            |            |  |
| Point No.                                      | In Water             | Deg F |  |                                        |            |            |  |
| A-1                                            | 2.400                | 147   |  | Oxygen %                               | 20.9       |            |  |
| 2                                              | 2.300                | 143   |  |                                        |            |            |  |
| 3                                              | 2.200                | 144   |  | Carbon Dioxide %                       | 0          |            |  |
| 4                                              | 2.000                | 144   |  |                                        |            |            |  |
| 5                                              | 1.800                | 142   |  | Moisture %                             | 4.64       |            |  |
| 6                                              | 1.800                | 139   |  |                                        |            |            |  |
| 7                                              | 1.800                | 140   |  | Stack Area sq.in.                      | 346.360595 |            |  |
| 8                                              | 1.700                | 140   |  |                                        |            |            |  |
| B-1                                            | 1.800                | 142   |  | Pbar                                   | 29.80      |            |  |
| 2                                              | 2.050                | 144   |  |                                        |            |            |  |
| 3                                              | 2.250                | 143   |  | Static Pressure                        | -1.2       |            |  |
| 4                                              | 2.200                | 144   |  |                                        |            |            |  |
| 5                                              | 2.300                | 144   |  | Pitot Coef.                            | 0.84       |            |  |
| 6                                              | 2.350                | 145   |  |                                        |            |            |  |
| 7                                              | 2.400                | 145   |  | Start Time                             | 1450       |            |  |
| 8                                              | 2.400                | 145   |  |                                        |            |            |  |
| 0                                              |                      |       |  | Stop Time                              | 1458       |            |  |
| 0                                              |                      |       |  |                                        |            |            |  |
| 0                                              |                      |       |  | Absolute Gas Pressure inches water     | Ps =       | 29.71      |  |
| 0                                              |                      |       |  |                                        |            |            |  |
| 0                                              |                      |       |  | Dry Mole Fraction of Gas               | Mfd =      | 0.95361    |  |
| 0                                              |                      |       |  |                                        |            |            |  |
| 0                                              |                      |       |  | Dry Molecular Weight of Gas lb/lb Mole | Md =       | 28.84      |  |
| 0                                              |                      |       |  |                                        |            |            |  |
| 0                                              |                      |       |  | Wet Molecular Weight of Gas lb/lb Mole | Ms =       | 28.33      |  |
| 0                                              |                      |       |  |                                        |            |            |  |
| 0                                              |                      |       |  | Average Gas Velocity ft/sec            | vs =       | 88.13      |  |
| 0                                              |                      |       |  |                                        |            |            |  |
| 0                                              |                      |       |  | Dry Volumetric Gas Flow Rate           |            |            |  |
| 0                                              |                      |       |  | at Standard Conditions SCFM            | Qsd =      | 10543      |  |
| 0                                              |                      |       |  |                                        |            |            |  |
| 0                                              |                      |       |  | Wet Volumetric Flue Gas Flow Rate      |            |            |  |
| 0                                              |                      |       |  | at Stack Conditions ACFM               | Qaw =      | 12718      |  |
| 0                                              |                      |       |  |                                        |            |            |  |
| 0                                              |                      |       |  | Wet Volumetric Gas Flow Rate           |            |            |  |
| 0                                              |                      |       |  | at Standard Conditions WSCFH           | WSCFH =    | 663328     |  |
| 0                                              |                      |       |  |                                        |            |            |  |
| 0                                              |                      |       |  | LKCH                                   |            |            |  |
| 0                                              |                      |       |  | Pre                                    | 3-4        | good       |  |
| 0                                              |                      |       |  | Post                                   | 5-3        | good       |  |
| #REF!                                          |                      |       |  |                                        |            |            |  |
| #REF!                                          |                      |       |  |                                        |            |            |  |

Pellet Mill 2 Cooler Run 3

|                                                |                      |              |              |                                               |  |                   |                |
|------------------------------------------------|----------------------|--------------|--------------|-----------------------------------------------|--|-------------------|----------------|
| Air Control Techniques EPA Method 2 Data Sheet |                      |              |              | ACT Job Number                                |  | 1911              |                |
| Client                                         | Enviva               |              |              | ACT Run Number                                |  | 9                 |                |
| Plant                                          | Wiggins              |              |              | Date                                          |  | 10/11/2013        |                |
| City/State                                     | Mississippi          |              |              | Gauge ID                                      |  | 909033            |                |
| Location                                       | Pellet Mill 2 Cooler |              |              | Pitot ID                                      |  | 4PEXT             |                |
| <b>Averages</b>                                |                      | <b>2.108</b> | <b>152.3</b> | Thermocouple ID                               |  | 4PEXT             |                |
|                                                | <b>Delta P</b>       | <b>Temp</b>  |              |                                               |  |                   |                |
| <b>Point No.</b>                               | <b>In Water</b>      | <b>Deg F</b> |              |                                               |  |                   |                |
| A-1                                            | 1.900                | 150          |              | <b>Oxygen %</b>                               |  | <b>20.9</b>       |                |
| 2                                              | 2.300                | 151          |              |                                               |  |                   |                |
| 3                                              | 2.300                | 154          |              | <b>Carbon Dioxide %</b>                       |  | <b>0</b>          |                |
| 4                                              | 2.200                | 152          |              |                                               |  |                   |                |
| 5                                              | 2.150                | 152          |              | <b>Moisture %</b>                             |  | <b>4.54</b>       |                |
| 6                                              | 2.200                | 152          |              |                                               |  |                   |                |
| 7                                              | 2.000                | 152          |              | <b>Stack Area sq.in.</b>                      |  | <b>346.360595</b> |                |
| 8                                              | 2.100                | 146          |              |                                               |  |                   |                |
| B-1                                            | 1.900                | 151          |              | <b>Pbar</b>                                   |  | <b>29.80</b>      |                |
| 2                                              | 2.000                | 154          |              |                                               |  |                   |                |
| 3                                              | 2.050                | 154          |              | <b>Static Pressure</b>                        |  | <b>-1.2</b>       |                |
| 4                                              | 2.200                | 154          |              |                                               |  |                   |                |
| 5                                              | 2.100                | 154          |              | <b>Pitot Coef.</b>                            |  | <b>0.84</b>       |                |
| 6                                              | 2.200                | 154          |              |                                               |  |                   |                |
| 7                                              | 2.050                | 154          |              | <b>Start Time</b>                             |  | <b>1614</b>       |                |
| 8                                              |                      |              |              |                                               |  |                   |                |
| 0                                              |                      |              |              | <b>Stop Time</b>                              |  | <b>1621</b>       |                |
| 0                                              |                      |              |              |                                               |  |                   |                |
| 0                                              |                      |              |              | <b>Absolute Gas Pressure inches water</b>     |  | <b>Ps =</b>       | <b>29.71</b>   |
| 0                                              |                      |              |              |                                               |  |                   |                |
| 0                                              |                      |              |              | <b>Dry Mole Fraction of Gas</b>               |  | <b>Mfd =</b>      | <b>0.95456</b> |
| 0                                              |                      |              |              |                                               |  |                   |                |
| 0                                              |                      |              |              | <b>Dry Molecular Weight of Gas lb/lb Mole</b> |  | <b>Md =</b>       | <b>28.84</b>   |
| 0                                              |                      |              |              |                                               |  |                   |                |
| 0                                              |                      |              |              | <b>Wet Molecular Weight of Gas lb/lb Mole</b> |  | <b>Ms =</b>       | <b>28.34</b>   |
| 0                                              |                      |              |              |                                               |  |                   |                |
| 0                                              |                      |              |              | <b>Average Gas Velocity ft/sec</b>            |  | <b>vs =</b>       | <b>88.91</b>   |
| 0                                              |                      |              |              |                                               |  |                   |                |
| 0                                              |                      |              |              | <b>Dry Volumetric Gas Flow Rate</b>           |  |                   |                |
| 0                                              |                      |              |              | <b>at Standard Conditions SCFM</b>            |  | <b>Qsd =</b>      | <b>10488</b>   |
| 0                                              |                      |              |              |                                               |  |                   |                |
| 0                                              |                      |              |              | <b>Wet Volumetric Flue Gas Flow Rate</b>      |  |                   |                |
| 0                                              |                      |              |              | <b>at Stack Conditions ACFM</b>               |  | <b>Qaw =</b>      | <b>12831</b>   |
| 0                                              |                      |              |              |                                               |  |                   |                |
| 0                                              |                      |              |              | <b>Wet Volumetric Gas Flow Rate</b>           |  |                   |                |
| 0                                              |                      |              |              | <b>at Standard Conditions WSCFH</b>           |  | <b>WSCFH =</b>    | <b>659261</b>  |
| 0                                              |                      |              |              |                                               |  |                   |                |
| 0                                              |                      |              |              | LKCH                                          |  |                   |                |
| 0                                              |                      |              |              | Pre                                           |  | 3-4               | good           |
| 0                                              |                      |              |              | Post                                          |  | 5-3               | good           |
| #REF!                                          |                      |              |              |                                               |  |                   |                |
| #REF!                                          |                      |              |              |                                               |  |                   |                |



**Air Control Techniques, P.C.**  
**Moisture Sampling Train Field Data Sheet**

Date 10/10/13  
8/4/13

| SOURCE IDENTIFICATION |                   | EQUIPMENT IDENTIFICATION |        |
|-----------------------|-------------------|--------------------------|--------|
| Facility              | ENVNA             | Umbilical ID             | 200    |
| City, State           | Wiggins, MS       | Meterbox ID              | 909033 |
| Test Location         | Green Hammer Mill | $\Delta H @$             | 1.917  |
| Personnel             | TJB JBG           | Gamma ( $\gamma$ )       | 0.9828 |

| Run Identification <u>m41</u> |                    |                                   |                  | <table border="1"> <thead> <tr> <th></th> <th>Actual</th> <th>Req'd</th> <th>Vac</th> </tr> </thead> <tbody> <tr> <td>Pre Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>10</td> </tr> <tr> <td>Post Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>10</td> </tr> </tbody> </table> |                  |                   |                     |                 |  | Actual | Req'd | Vac | Pre Leak Check | 0.000 | < 0.02 or 4% | 10 | Post Leak Check | 0.000 | < 0.02 or 4% | 10 |
|-------------------------------|--------------------|-----------------------------------|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-------------------|---------------------|-----------------|--|--------|-------|-----|----------------|-------|--------------|----|-----------------|-------|--------------|----|
|                               | Actual             | Req'd                             | Vac              |                                                                                                                                                                                                                                                                                                               |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |    |
| Pre Leak Check                | 0.000              | < 0.02 or 4%                      | 10               |                                                                                                                                                                                                                                                                                                               |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |    |
| Post Leak Check               | 0.000              | < 0.02 or 4%                      | 10               |                                                                                                                                                                                                                                                                                                               |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |    |
| Clock Time                    | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.)                                                                                                                                                                                                                                                                                         | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |  |        |       |     |                |       |              |    |                 |       |              |    |
| 9:17                          | 0                  | 470.600                           | 65               | 1.0                                                                                                                                                                                                                                                                                                           | N/A              | N/A               | 55                  | 5               |  |        |       |     |                |       |              |    |                 |       |              |    |
| 9:32                          | 15                 | 479.71                            | 66               | 1.0                                                                                                                                                                                                                                                                                                           | ↓                | ↓                 | 55                  | 5               |  |        |       |     |                |       |              |    |                 |       |              |    |
| 9:47                          | 30                 | 487.5                             | 66               | 1.0                                                                                                                                                                                                                                                                                                           | ↓                | ↓                 | 56                  | 5               |  |        |       |     |                |       |              |    |                 |       |              |    |
| 10:02                         | 45                 | 496.2                             | 67               | 1.0                                                                                                                                                                                                                                                                                                           | ↓                | ↓                 | 60                  | 6               |  |        |       |     |                |       |              |    |                 |       |              |    |
| 10:17                         | 60                 | 504.468                           |                  |                                                                                                                                                                                                                                                                                                               | ↓                | ↓                 |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |    |

| Run Identification <u>2</u> |                    |                                   |                  | <table border="1"> <thead> <tr> <th></th> <th>Actual</th> <th>Req'd</th> <th>Vac</th> </tr> </thead> <tbody> <tr> <td>Pre Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>10</td> </tr> <tr> <td>Post Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>9</td> </tr> </tbody> </table> |                  |                   |                     |                 |  | Actual | Req'd | Vac | Pre Leak Check | 0.000 | < 0.02 or 4% | 10 | Post Leak Check | 0.000 | < 0.02 or 4% | 9 |
|-----------------------------|--------------------|-----------------------------------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-------------------|---------------------|-----------------|--|--------|-------|-----|----------------|-------|--------------|----|-----------------|-------|--------------|---|
|                             | Actual             | Req'd                             | Vac              |                                                                                                                                                                                                                                                                                                              |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |
| Pre Leak Check              | 0.000              | < 0.02 or 4%                      | 10               |                                                                                                                                                                                                                                                                                                              |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |
| Post Leak Check             | 0.000              | < 0.02 or 4%                      | 9                |                                                                                                                                                                                                                                                                                                              |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |
| Clock Time                  | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.)                                                                                                                                                                                                                                                                                        | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |  |        |       |     |                |       |              |    |                 |       |              |   |
| 10:36                       | 0                  | 504.700                           | 68               | 1.0                                                                                                                                                                                                                                                                                                          | N/A              | N/A               | 60                  | 5               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 10:51                       | 15                 | 513.10                            | 70               |                                                                                                                                                                                                                                                                                                              | ↓                | ↓                 | 55                  | 5               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 11:06                       | 30                 | 521.9                             | 72               | ↓                                                                                                                                                                                                                                                                                                            | ↓                | ↓                 | 55                  | 5               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 11:21                       | 45                 | 530.0                             | 73               | ↓                                                                                                                                                                                                                                                                                                            | ↓                | ↓                 | 57                  | 5               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 11:36                       | 60                 | 538.681                           |                  | ↓                                                                                                                                                                                                                                                                                                            | ↓                | ↓                 |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |

| Run Identification <u>3</u> |                    |                                   |                  | <table border="1"> <thead> <tr> <th></th> <th>Actual</th> <th>Req'd</th> <th>Vac</th> </tr> </thead> <tbody> <tr> <td>Pre Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>11</td> </tr> <tr> <td>Post Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>9</td> </tr> </tbody> </table> |                  |                   |                     |                 |  | Actual | Req'd | Vac | Pre Leak Check | 0.000 | < 0.02 or 4% | 11 | Post Leak Check | 0.000 | < 0.02 or 4% | 9 |
|-----------------------------|--------------------|-----------------------------------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-------------------|---------------------|-----------------|--|--------|-------|-----|----------------|-------|--------------|----|-----------------|-------|--------------|---|
|                             | Actual             | Req'd                             | Vac              |                                                                                                                                                                                                                                                                                                              |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |
| Pre Leak Check              | 0.000              | < 0.02 or 4%                      | 11               |                                                                                                                                                                                                                                                                                                              |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |
| Post Leak Check             | 0.000              | < 0.02 or 4%                      | 9                |                                                                                                                                                                                                                                                                                                              |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |
| Clock Time                  | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.)                                                                                                                                                                                                                                                                                        | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |  |        |       |     |                |       |              |    |                 |       |              |   |
| 11:50                       | 0                  | 538.900                           | 74               | 1.0                                                                                                                                                                                                                                                                                                          | N/A              | N/A               | 59                  | 5               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 12:05                       | 15                 | 549.0                             | 75               | ↓                                                                                                                                                                                                                                                                                                            | ↓                | ↓                 | 50                  | 5               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 12:20                       | 30                 | 557.8                             | 76               | ↓                                                                                                                                                                                                                                                                                                            | ↓                | ↓                 | 51                  | 5               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 12:35                       | 45                 | 563.4                             | 77               | ↓                                                                                                                                                                                                                                                                                                            | ↓                | ↓                 | 53                  | 5               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 12:50                       | 60                 | 572.056                           |                  | ↓                                                                                                                                                                                                                                                                                                            | ↓                | ↓                 |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |

# Method 4 - Air Control Techniques, P.C.

Date 10/10/13

## Identification Information

|            |         |         |                                    |
|------------|---------|---------|------------------------------------|
| Client     | ENLIVA  | Job     | 1911                               |
| Plant Name | Wiggins | Process | <del>Green</del> Green Hammer Mill |
| City       | Wiggins | State   | MS                                 |

## Sampling Information

|               |         |                |            |
|---------------|---------|----------------|------------|
| Run Number    |         | Balance Number | 600        |
| Sampling Date |         | Balance Type   | ELECTRONIC |
| Recovery Date |         | Balance Level  | EVI-1000   |
| Personnel     | TJB JBG | Recovery Area  | ✓          |

## Location Moisture Data

|                           | Run Number | M4-1  | M4-2  | M4-3  |
|---------------------------|------------|-------|-------|-------|
| <b>Impinger 1</b>         |            |       |       |       |
| Final Weight, grams/mls   |            | 809.3 | 743.0 | 822.7 |
| Initial Weight, grams/mls |            | 735.6 | 724.5 | 809.3 |
| Condensed Water, grams    |            | 73.7  | 18.5  | 13.4  |
| <b>Impinger 2</b>         |            |       |       |       |
| Final Weight, grams/mls   |            | 661.1 | 729.5 | 661.5 |
| Initial Weight, grams/mls |            | 719.0 | 728.8 | 661.1 |
| Condensed Water, grams    |            | -57.9 | 0.7   | 0.4   |
| <b>Impinger 3</b>         |            |       |       |       |
| Final Weight, grams/mls   |            | 595.9 | 597.0 | 596.1 |
| Initial Weight, grams/mls |            | 594.4 | 595.6 | 595.9 |
| Condensed Water, grams    |            | 1.5   | 1.4   | 0.2   |
| Condensed Water, grams    |            | 17.3  | 20.6  |       |
| <b>Silica Gel</b>         |            |       |       |       |
| Final Weight, grams       |            | 815.3 | 797.7 | 817.9 |
| Initial Weight, grams     |            | 807.5 | 791.1 | 815.3 |
| Adsorbed Water, grams     |            | 7.8   | 6.6   | 2.6   |
| Adsorbed Water, grams     |            |       |       |       |
| Total Water, grams        |            | 25.1  | 26.5  | 16.6  |

$Vm(std) = \text{Volume of gas sampled at standard conditions (dscf)}$   
 $Vm(std) = ((\text{Gamma} * 17.64 * Vm * (Pbar + (\Delta H / 13.6))) / (Tm + 460))$   
 $Vwc(std) = \text{volume of water vapor at standard conditions (scf)}$   
 $Vwc(std) = (0.04707) * (\text{volume of water collected (mls)})$   
 $Bws = \text{Mole fraction of water vapor}$   
 $Bws = Vwc(std) / (Vm(std) + Vwc(std))$   
 $\text{Percent Moisture} = 100 * Bws$



Air Control Techniques, P.C.  
Moisture Sampling Train Field Data Sheet

Date 8/19/13  
10/10/13

| SOURCE IDENTIFICATION |            | EQUIPMENT IDENTIFICATION |        |
|-----------------------|------------|--------------------------|--------|
| Facility              | ENVIVA     | Umbilical ID             | 200    |
| City, State           | Wagons, MS | Meterbox ID              | 909033 |
| Test Location         | DRYER #1   | $\Delta H @$             | 1.917  |
| Personnel             | TJB, JBS   | Gamma ( $\gamma$ )       | 0.9828 |

| Run Identification |  | Actual          |       | Req'd        |    | Vac |  |
|--------------------|--|-----------------|-------|--------------|----|-----|--|
| 144                |  | Pre Leak Check  | 0.000 | < 0.02 or 4% | 10 |     |  |
|                    |  | Post Leak Check | 0.000 | < 0.02 or 4% | 9  |     |  |

| Clock Time | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.) | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |
|------------|--------------------|-----------------------------------|------------------|-----------------------|------------------|-------------------|---------------------|-----------------|
| 1734       | 0                  | 572.300                           | 80               | 1.0                   | N/A              | N/A               | 58                  | 3               |
| 1753       | 15                 | 580.90                            | 81               | ↓                     | ↓                | ↓                 | 54                  | 3               |
| 1808       | 30                 | 581.10                            | 82               | ↓                     | ↓                | ↓                 | 56                  | 3               |
| 1823       | 45                 | 597.2                             | 82               | ↓                     | ↓                | ↓                 | 57                  | 3               |
| 1838       | 60                 | 605.501                           |                  | ↓                     | ↓                | ↓                 |                     |                 |

10/11/13

| Run Identification |  | Actual          |       | Req'd        |    | Vac |  |
|--------------------|--|-----------------|-------|--------------|----|-----|--|
| 5                  |  | Pre Leak Check  | 0.000 | < 0.02 or 4% | 10 |     |  |
|                    |  | Post Leak Check | 0.000 | < 0.02 or 4% | 10 |     |  |

| Clock Time | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.) | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |
|------------|--------------------|-----------------------------------|------------------|-----------------------|------------------|-------------------|---------------------|-----------------|
| 1000       | 0                  | 605.700                           | 70               | 1.0                   | N/A              | N/A               | 59                  | 3               |
| 1015       | 15                 | 614.00                            | 74               | ↓                     | ↓                | ↓                 | 63                  | 3               |
| 1030       | 30                 | 622.24                            | 79               | ↓                     | ↓                | ↓                 | 66                  | 3               |
| 1045       | 45                 | 630.61                            | 83               | ↓                     | ↓                | ↓                 | 67                  | 3               |
| 1100       | 60                 | 638.921                           |                  | ↓                     | ↓                | ↓                 |                     |                 |

10/11/13

| Run Identification |  | Actual          |       | Req'd        |    | Vac |  |
|--------------------|--|-----------------|-------|--------------|----|-----|--|
| 6                  |  | Pre Leak Check  | 0.000 | < 0.02 or 4% | 10 |     |  |
|                    |  | Post Leak Check | 0.000 | < 0.02 or 4% | 10 |     |  |

| Clock Time | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.) | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |
|------------|--------------------|-----------------------------------|------------------|-----------------------|------------------|-------------------|---------------------|-----------------|
| 1137       | 0                  | 639.106                           | 86               | 1.0                   | N/A              | N/A               | 56                  | 3               |
| 1152       | 15                 | 647.5                             | 87               | ↓                     | ↓                | ↓                 | 58                  | 3               |
| 1207       | 30                 | 655.17                            | 87               | ↓                     | ↓                | ↓                 | 59                  | 3               |
| 1222       | 45                 | 663.24                            | 88               | ↓                     | ↓                | ↓                 | 61                  | 3               |
| 1237       | 60                 | 671.665                           |                  | ↓                     | ↓                | ↓                 |                     |                 |

# Method 4 - Air Control Techniques, P.C.

Date 10/10/2013

## Identification Information

|            |         |         |          |
|------------|---------|---------|----------|
| Client     | Enviya  | Job     | 2911     |
| Plant Name | Wiggins | Process | DRYER #1 |
| City       | Wiggins | State   | MS       |

## Sampling Information

|               |         |                |            |
|---------------|---------|----------------|------------|
| Run Number    |         | Balance Number | V1000      |
| Sampling Date |         | Balance Type   | Electronic |
| Recovery Date |         | Balance Level  | ✓          |
| Personnel     | TTB JB6 | Recovery Area  | ✓          |

## Location Moisture Data

|                           |       |       |       |
|---------------------------|-------|-------|-------|
| Run Number                | 4     | 5     | 6     |
| <u>Impinger 1</u>         |       |       |       |
| Final Weight, grams/mls   | 858.1 | 943.8 | 826.7 |
| Initial Weight, grams/mls | 743.0 | 822.7 | 722.7 |
| Condensed Water, grams    | 115.1 | 121.1 | 104.0 |
| <u>Impinger 2</u>         |       |       |       |
| Final Weight, grams/mls   | 736.5 | 630.7 | 744.4 |
| Initial Weight, grams/mls | 729.5 | 601.5 | 736.5 |
| Condensed Water, grams    | 7.0   | 29.2  | 7.9   |
| <u>Impinger 3</u>         |       |       |       |
| Final Weight, grams/mls   | 597.1 | 599.5 | 597.8 |
| Initial Weight, grams/mls | 597.0 | 596.1 | 597.1 |
| Condensed Water, grams    | 0.1   | 3.4   | 0.7   |
| Condensed Water, grams    |       |       |       |
| <u>Silica Gel</u>         |       |       |       |
| Final Weight, grams       | 805.0 | 824.0 | 809.9 |
| Initial Weight, grams     | 797.7 | 817.9 | 805.0 |
| Adsorbed Water, grams     | 7.3   | 6.1   | 4.9   |
| Adsorbed Water, grams     | 129.5 | 99.8  |       |
|                           | ↓     | ↓     |       |
| Total Water, grams        |       |       | 117.5 |

$V_m(\text{std}) = \text{Volume of gas sampled at standard conditions (dscf)}$   
 $V_m(\text{std}) = ((\text{Gamma} * 17.64 * V_m * (\text{Pbar} + (\Delta H / 13.6))) / (\text{Tm} + 460))$   
 $V_{wc}(\text{std}) = \text{volume of water vapor at standard conditions (scf)}$   
 $V_{wc}(\text{std}) = (0.04707) * (\text{volume of water collected (mls)})$   
 $B_{ws} = \text{Mole fraction of water vapor}$   
 $B_{ws} = V_{wc}(\text{std}) / (V_m(\text{std}) + V_{wc}(\text{std}))$   
 $\text{Percent Moisture} = 100 * B_{ws}$



**Air Control Techniques, P.C.**  
**Moisture Sampling Train Field Data Sheet**

Date 10/11/13

| SOURCE IDENTIFICATION |                             | EQUIPMENT IDENTIFICATION |        |
|-----------------------|-----------------------------|--------------------------|--------|
| Facility              | ENVIVA                      | Umbilical ID             | 200    |
| City, State           | Wiggins MS                  | Meterbox ID              | 909833 |
| Test Location         | Polystyrene Mill Coolers #2 | $\Delta H @$             | 1.917  |
| Personnel             | TJB JBB                     | Gamma ( $\gamma$ )       | 0.9828 |

| Run Identification <u>M4-7</u> |                    |                                   |                  | <table border="1"> <thead> <tr> <th></th> <th>Actual</th> <th>Req'd</th> <th>Vac</th> </tr> </thead> <tbody> <tr> <td>Pre Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>10</td> </tr> <tr> <td>Post Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>8</td> </tr> </tbody> </table> |                  |                   |                     |                 |  | Actual | Req'd | Vac | Pre Leak Check | 0.000 | < 0.02 or 4% | 10 | Post Leak Check | 0.000 | < 0.02 or 4% | 8 |
|--------------------------------|--------------------|-----------------------------------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-------------------|---------------------|-----------------|--|--------|-------|-----|----------------|-------|--------------|----|-----------------|-------|--------------|---|
|                                | Actual             | Req'd                             | Vac              |                                                                                                                                                                                                                                                                                                              |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |
| Pre Leak Check                 | 0.000              | < 0.02 or 4%                      | 10               |                                                                                                                                                                                                                                                                                                              |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |
| Post Leak Check                | 0.000              | < 0.02 or 4%                      | 8                |                                                                                                                                                                                                                                                                                                              |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |
| Clock Time                     | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.)                                                                                                                                                                                                                                                                                        | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |  |        |       |     |                |       |              |    |                 |       |              |   |
| 1343                           | 0                  | 672.000                           | 85               | 1.0                                                                                                                                                                                                                                                                                                          | N/A              | N/A               | 57                  | 3               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 1358                           | 15                 | 680.60                            | 86               | ↓                                                                                                                                                                                                                                                                                                            | ↓                | ↓                 | 61                  | 3               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 1413                           | 30                 | 689.23                            | 89               | ↓                                                                                                                                                                                                                                                                                                            | ↓                | ↓                 | 61                  | 3               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 1428                           | 45                 | 698.1                             | 89               | ↓                                                                                                                                                                                                                                                                                                            | ↓                | ↓                 | 60                  | 3               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 1443                           | 60                 | 706.310                           |                  | ↓                                                                                                                                                                                                                                                                                                            | ↓                | ↓                 |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |

| Run Identification <u>M4-8</u> |                    |                                   |                  | <table border="1"> <thead> <tr> <th></th> <th>Actual</th> <th>Req'd</th> <th>Vac</th> </tr> </thead> <tbody> <tr> <td>Pre Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>10</td> </tr> <tr> <td>Post Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>4</td> </tr> </tbody> </table> |                  |                   |                     |                 |  | Actual | Req'd | Vac | Pre Leak Check | 0.000 | < 0.02 or 4% | 10 | Post Leak Check | 0.000 | < 0.02 or 4% | 4 |
|--------------------------------|--------------------|-----------------------------------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-------------------|---------------------|-----------------|--|--------|-------|-----|----------------|-------|--------------|----|-----------------|-------|--------------|---|
|                                | Actual             | Req'd                             | Vac              |                                                                                                                                                                                                                                                                                                              |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |
| Pre Leak Check                 | 0.000              | < 0.02 or 4%                      | 10               |                                                                                                                                                                                                                                                                                                              |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |
| Post Leak Check                | 0.000              | < 0.02 or 4%                      | 4                |                                                                                                                                                                                                                                                                                                              |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |
| Clock Time                     | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.)                                                                                                                                                                                                                                                                                        | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |  |        |       |     |                |       |              |    |                 |       |              |   |
| 1508                           | 0                  | 706.100                           | 89               | 1.0                                                                                                                                                                                                                                                                                                          | N/A              | N/A               | 58                  | 3               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 1523                           | 15                 | 715.19                            | 89               | ↓                                                                                                                                                                                                                                                                                                            | ↓                | ↓                 | 59                  | 3               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 1538                           | 30                 | 723.95                            | 89               | ↓                                                                                                                                                                                                                                                                                                            | ↓                | ↓                 | 59                  | 3               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 1553                           | 45                 | 732.97                            | 90               | ↓                                                                                                                                                                                                                                                                                                            | ↓                | ↓                 | 61                  | 3               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 1608                           | 60                 | 741.023                           |                  | ↓                                                                                                                                                                                                                                                                                                            | ↓                | ↓                 |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |

| Run Identification <u>M4-9</u> |                    |                                   |                  | <table border="1"> <thead> <tr> <th></th> <th>Actual</th> <th>Req'd</th> <th>Vac</th> </tr> </thead> <tbody> <tr> <td>Pre Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>12</td> </tr> <tr> <td>Post Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>9</td> </tr> </tbody> </table> |                  |                   |                     |                 |  | Actual | Req'd | Vac | Pre Leak Check | 0.000 | < 0.02 or 4% | 12 | Post Leak Check | 0.000 | < 0.02 or 4% | 9 |
|--------------------------------|--------------------|-----------------------------------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-------------------|---------------------|-----------------|--|--------|-------|-----|----------------|-------|--------------|----|-----------------|-------|--------------|---|
|                                | Actual             | Req'd                             | Vac              |                                                                                                                                                                                                                                                                                                              |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |
| Pre Leak Check                 | 0.000              | < 0.02 or 4%                      | 12               |                                                                                                                                                                                                                                                                                                              |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |
| Post Leak Check                | 0.000              | < 0.02 or 4%                      | 9                |                                                                                                                                                                                                                                                                                                              |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |
| Clock Time                     | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.)                                                                                                                                                                                                                                                                                        | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |  |        |       |     |                |       |              |    |                 |       |              |   |
| 0                              | 1629               | 741.300                           | 85               | 1.0                                                                                                                                                                                                                                                                                                          | N/A              | N/A               | 57                  | 3               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 15                             | 1644               | 749.90                            | 84               | ↓                                                                                                                                                                                                                                                                                                            | ↓                | ↓                 | 60                  | 3               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 30                             | 1659               | 758.29                            | 83               | ↓                                                                                                                                                                                                                                                                                                            | ↓                | ↓                 | 59                  | 3               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 45                             | 1714               | 766.105                           | 83               | ↓                                                                                                                                                                                                                                                                                                            | ↓                | ↓                 | 60                  | 3               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 60                             | 1729               | 774.981                           |                  | ↓                                                                                                                                                                                                                                                                                                            | ↓                | ↓                 |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |

# Method 4 - Air Control Techniques, P.C.

Date

## Identification Information

|            |             |         |                |
|------------|-------------|---------|----------------|
| Client     | ENVIVA      | Job     | 1911           |
| Plant Name | Wiggins, MS | Process | Helix m, 11 #2 |
| City       | Wiggins, MS | State   | MS             |

codes

## Sampling Information

|               |         |                |            |
|---------------|---------|----------------|------------|
| Run Number    |         | Balance Number | 1020       |
| Sampling Date |         | Balance Type   | Electronic |
| Recovery Date |         | Balance Level  | ✓          |
| Personnel     | TTB JBG | Recovery Area  | ✓          |

## Location Moisture Data

|                           | Run Number | 7     | 8     | 9     |
|---------------------------|------------|-------|-------|-------|
| <u>Impinger 1</u>         |            |       |       |       |
| Final Weight, grams/mls   |            | 719.2 | 852.1 | 746.3 |
| Initial Weight, grams/mls |            | 695.2 | 826.7 | 719.2 |
| Condensed Water, grams    |            | 24.0  | 25.4  | 27.1  |
| <u>Impinger 2</u>         |            |       |       |       |
| Final Weight, grams/mls   |            | 715.4 | 747.4 | 717.5 |
| Initial Weight, grams/mls |            | 712.2 | 744.4 | 715.4 |
| Condensed Water, grams    |            | 3.2   | 3.0   | 2.1   |
| <u>Impinger 3</u>         |            |       |       |       |
| Final Weight, grams/mls   |            | 603.6 | 598.2 | 603.8 |
| Initial Weight, grams/mls |            | 599.5 | 597.8 | 603.6 |
| Condensed Water, grams    |            | 4.1   | 0.4   | 0.2   |
| Condensed Water, grams    |            |       |       |       |
| <u>Silica Gel</u>         |            |       |       |       |
| Final Weight, grams       |            | 827.9 | 814.6 | 830.9 |
| Initial Weight, grams     |            | 824.0 | 809.9 | 827.9 |
| Adsorbed Water, grams     |            | 3.9   | 4.7   | 3.0   |
| Adsorbed Water, grams     |            | —     | —     | —     |
| Total Water, grams        |            | 35.2  | 33.5  | 32.4  |

$V_m(\text{std})$  = Volume of gas sampled at standard conditions (dscf)

$V_m(\text{std}) = ((\text{Gamma} * 17.64 * V_m * (\text{Pbar} + (\Delta H / 13.6))) / (T_m + 460))$

$V_{wc}(\text{std})$  = volume of water vapor at standard conditions (scf)

$V_{wc}(\text{std}) = (0.04707) * (\text{volume of water collected (mls)})$

Bws = Mole fraction of water vapor

$Bws = V_{wc}(\text{std}) / (V_m(\text{std}) + V_{wc}(\text{std}))$

Percent Moisture =  $100 * Bws$



**Air Control Techniques, P.C.**  
**Moisture Sampling Train Field Data Sheet**

Date 10/11/13

| SOURCE IDENTIFICATION |                     | EQUIPMENT IDENTIFICATION |        |
|-----------------------|---------------------|--------------------------|--------|
| Facility              | ENVIVA              | Umbilical ID             | 200    |
| City, State           | WIGGINS, MS         | Meterbox ID              | 909033 |
| Test Location         | DRY Hammock Mill #2 | $\Delta H @$             | 1.917  |
| Personnel             | Mr. J.B.G.          | Gamma ( $\gamma$ )       | 0.9828 |

| Run Identification |                    |                                   |                  | Actual                |                  |                   |                     |                 | Req'd        | Vac |
|--------------------|--------------------|-----------------------------------|------------------|-----------------------|------------------|-------------------|---------------------|-----------------|--------------|-----|
|                    |                    |                                   |                  | Pre Leak Check        |                  |                   |                     |                 | < 0.02 or 4% | 10  |
|                    |                    |                                   |                  | Post Leak Check       |                  |                   |                     |                 | < 0.02 or 4% | 10  |
| Clock Time         | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.) | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |              |     |
| 1811               | 0                  | 775.300                           | 80               | 1.0                   | N/A              | N/A               | 55                  | 3               |              |     |
| 1826               | 15                 | 784.200                           | 80               | ↓                     | ↓                | ↓                 | 54                  | 3               |              |     |
| 1841               | 30                 | <del>786.71</del>                 | 80               | ↓                     | ↓                | ↓                 | 54                  | 3               |              |     |
| 1846               | 45                 | 800.71                            | 81               | ↓                     | ↓                | ↓                 | 55                  | 3               |              |     |
| 1851               | 60                 | 808.71                            |                  | ↓                     | ↓                | ↓                 |                     |                 |              |     |
|                    |                    |                                   |                  | 795,100               |                  |                   |                     |                 |              |     |

| Run Identification |                    |                                   |                  | Actual                |                  |                   |                     |                 | Req'd        | Vac |
|--------------------|--------------------|-----------------------------------|------------------|-----------------------|------------------|-------------------|---------------------|-----------------|--------------|-----|
|                    |                    |                                   |                  | Pre Leak Check        |                  |                   |                     |                 | < 0.02 or 4% | 10  |
|                    |                    |                                   |                  | Post Leak Check       |                  |                   |                     |                 | < 0.02 or 4% | 10  |
| Clock Time         | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.) | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |              |     |
| 1935               | 0                  | 809.400                           | 79               | 1.0                   | N/A              | N/A               | 57                  | 3               |              |     |
| 1950               | 15                 | 817.9                             | 78               | ↓                     | ↓                | ↓                 | 55                  | 3               |              |     |
| 2005               | 30                 | 826.5                             | 79               | ↓                     | ↓                | ↓                 | 56                  | 3               |              |     |
| 2020               | 45                 | 835.3                             | 79               | ↓                     | ↓                | ↓                 | 56                  | 3               |              |     |
| 2035               | 60                 | 843.84                            |                  | ↓                     | ↓                | ↓                 |                     |                 |              |     |

| Run Identification |                    |                                   |                  | Actual                |                  |                   |                     |                 | Req'd        | Vac |
|--------------------|--------------------|-----------------------------------|------------------|-----------------------|------------------|-------------------|---------------------|-----------------|--------------|-----|
|                    |                    |                                   |                  | Pre Leak Check        |                  |                   |                     |                 | < 0.02 or 4% | 12  |
|                    |                    |                                   |                  | Post Leak Check       |                  |                   |                     |                 | < 0.02 or 4% | 9   |
| Clock Time         | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.) | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |              |     |
| 2048               | 0                  | 843.300                           | 78               | 1.0                   | N/A              | N/A               | 57                  | 3               |              |     |
| 2103               | 15                 | 852.17                            | 78               | ↓                     | ↓                | ↓                 | 57                  | 3               |              |     |
| 2118               | 30                 | 860.25                            | 79               | ↓                     | ↓                | ↓                 | 57                  | 3               |              |     |
| 2133               | 45                 | 868.82                            | 78               | ↓                     | ↓                | ↓                 | 56                  | 3               |              |     |
| 2148               | 60                 | 877.176                           |                  | ↓                     | ↓                | ↓                 |                     |                 |              |     |

32.4  
32.5

# Method 4 - Air Control Techniques, P.C.

Date

## Identification Information

Client ENVIVA  
Plant Name Wiggins  
City Wiggins

Job 1911  
Process DRY Hammermill #2  
State MS

## Sampling Information

Run Number  
Sampling Date  
Recovery Date  
Personnel TJB JBG

Balance Number V1000  
Balance Type Electronic  
Balance Level ✓  
Recovery Area ✓

## Location Moisture Data

Run Number 10 11 12

### Impinger 1

|                           |              |              |              |
|---------------------------|--------------|--------------|--------------|
| Final Weight, grams/mls   | <u>875.7</u> | <u>770.2</u> | <u>898.8</u> |
| Initial Weight, grams/mls | <u>852.1</u> | <u>746.3</u> | <u>875.7</u> |
| Condensed Water, grams    | <u>23.6</u>  | <u>23.9</u>  | <u>23.1</u>  |

### Impinger 2

|                           |              |              |              |
|---------------------------|--------------|--------------|--------------|
| Final Weight, grams/mls   | <u>749.9</u> | <u>720.5</u> | <u>752.8</u> |
| Initial Weight, grams/mls | <u>747.4</u> | <u>717.5</u> | <u>749.9</u> |
| Condensed Water, grams    | <u>2.5</u>   | <u>3.0</u>   | <u>2.9</u>   |

### Impinger 3

|                           |              |              |              |
|---------------------------|--------------|--------------|--------------|
| Final Weight, grams/mls   | <u>598.4</u> | <u>604.4</u> | <u>598.8</u> |
| Initial Weight, grams/mls | <u>598.2</u> | <u>603.8</u> | <u>598.4</u> |
| Condensed Water, grams    | <u>0.2</u>   | <u>0.6</u>   | <u>0.4</u>   |

Condensed Water, grams

### Silica Gel

|                       |              |              |              |
|-----------------------|--------------|--------------|--------------|
| Final Weight, grams   | <u>818.5</u> | <u>833.4</u> | <u>822.3</u> |
| Initial Weight, grams | <u>814.6</u> | <u>830.9</u> | <u>818.5</u> |
| Adsorbed Water, grams | <u>3.9</u>   | <u>2.5</u>   | <u>3.8</u>   |

Adsorbed Water, grams

Total Water, grams 30.2 30.0 30.2

$Vm(std)$  = Volume of gas sampled at standard conditions (dscf)  
 $Vm(std) = ((\text{Gamma} * 17.64 * Vm * (Pbar + (\Delta H / 13.6))) / (Tm + 460))$   
 $Vwc(std)$  = volume of water vapor at standard conditions (scf)  
 $Vwc(std) = (0.04707) * (\text{volume of water collected (mls)})$   
 $Bws$  = Mole fraction of water vapor  
 $Bws = Vwc(std) / (Vm(std) + Vwc(std))$   
Percent Moisture =  $100 * Bws$



Air Control Techniques, P.C.  
Moisture Sampling Train Field Data Sheet

Date 10/12/13

| SOURCE IDENTIFICATION |                       | EQUIPMENT IDENTIFICATION |        |
|-----------------------|-----------------------|--------------------------|--------|
| Facility              | ENVIVA                | Umbilical ID             | 200    |
| City, State           | Wiggins MS            | Meterbox ID              | 09033  |
| Test Location         | Pellet Mill #1 Cooler | $\Delta H @$             | 1.917  |
| Personnel             | TJR JBB               | Gamma ( $\gamma$ )       | 0.9808 |

| Run Identification <u>M4-13</u> |                    |                                   |                  | Actual                |                  | Req'd             |                     | Vac             |
|---------------------------------|--------------------|-----------------------------------|------------------|-----------------------|------------------|-------------------|---------------------|-----------------|
|                                 |                    |                                   |                  | Pre Leak Check        | 0.000            | < 0.02 or 4%      | 12                  |                 |
|                                 |                    |                                   |                  | Post Leak Check       | 0.000            | < 0.02 or 4%      | 8                   |                 |
| Clock Time                      | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.) | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |
| 858                             | 0                  | 877.400                           | 67               | 1.0                   | N/A              | N/A               | 52                  | 3               |
| 913                             | 15                 | 886.03                            | 70               | ↓                     | ↓                | ↓                 | 55                  | 3               |
| 928                             | 30                 | 895.1                             | 73               | ↓                     | ↓                | ↓                 | 56                  | 3               |
| 943                             | 45                 | 903.1                             | 77               | ↓                     | ↓                | ↓                 | 58                  | 3               |
| 958                             | 60                 | 911.268                           |                  | ↓                     | ↓                | ↓                 |                     |                 |

| Run Identification <u>M4-14</u> |                    |                                   |                  | Actual                |                  | Req'd             |                     | Vac             |
|---------------------------------|--------------------|-----------------------------------|------------------|-----------------------|------------------|-------------------|---------------------|-----------------|
|                                 |                    |                                   |                  | Pre Leak Check        | 0.000            | < 0.02 or 4%      | 10                  |                 |
|                                 |                    |                                   |                  | Post Leak Check       | 0.000            | < 0.02 or 4%      | 10                  |                 |
| Clock Time                      | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.) | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |
| 1022                            | 0                  | 911.500                           | 74               | 1.0                   | N/A              | N/A               | 59                  | 3               |
| 1037                            | 15                 | 920.39                            | 82               | ↓                     | ↓                | ↓                 | 60                  | 3               |
| 1052                            | 30                 | 929.10                            | 86               | ↓                     | ↓                | ↓                 | 54                  | 3               |
| 1107                            | 45                 | 938.32                            | 88               | ↓                     | ↓                | ↓                 | 55                  | 3               |
| 1122                            | 60                 | 947.345                           |                  | ↓                     | ↓                | ↓                 |                     |                 |

| Run Identification <u>M4-15</u> |                    |                                   |                  | Actual                |                  | Req'd             |                     | Vac             |
|---------------------------------|--------------------|-----------------------------------|------------------|-----------------------|------------------|-------------------|---------------------|-----------------|
|                                 |                    |                                   |                  | Pre Leak Check        | 0.000            | < 0.02 or 4%      | 11                  |                 |
|                                 |                    |                                   |                  | Post Leak Check       | 0.010            | < 0.02 or 4%      | 9                   |                 |
| Clock Time                      | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.) | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |
| 1141                            | 0                  | 947.600                           | 89               | 1.0                   | N/A              | N/A               | 56                  | 3               |
| 1156                            | 15                 | 956.32                            | 89               | ↓                     | ↓                | ↓                 | 60                  | 3               |
| 1211                            | 30                 | 964.92                            | 89               | ↓                     | ↓                | ↓                 | 60                  | 3               |
| 1226                            | 45                 | 973.55                            | 89               | ↓                     | ↓                | ↓                 | 61                  | 3               |
| 1241                            | 60                 | 982.167                           |                  | ↓                     | ↓                | ↓                 |                     |                 |

# Method 4 - Air Control Techniques, P.C.

Date

## Identification Information

Client Envira  
Plant Name Wiggins  
City Wiggins

Job 1911  
Process Rellet Codes # 1  
State MS

## Sampling Information

Run Number             
Sampling Date             
Recovery Date             
Personnel TTB JBG

Balance Number             
Balance Type             
Balance Level             
Recovery Area           

## Location Moisture Data

Run Number 13 14 15

### Impinger 1

|                           |              |              |              |
|---------------------------|--------------|--------------|--------------|
| Final Weight, grams/mls   | <u>748.2</u> | <u>787.3</u> | <u>765.0</u> |
| Initial Weight, grams/mls | <u>728.1</u> | <u>763.4</u> | <u>748.2</u> |
| Condensed Water, grams    | <u>20.1</u>  | <u>23.9</u>  | <u>16.8</u>  |

### Impinger 2

|                           |              |              |              |
|---------------------------|--------------|--------------|--------------|
| Final Weight, grams/mls   | <u>722.1</u> | <u>754.0</u> | <u>722.9</u> |
| Initial Weight, grams/mls | <u>720.5</u> | <u>752.8</u> | <u>722.1</u> |
| Condensed Water, grams    | <u>1.6</u>   | <u>1.2</u>   | <u>0.8</u>   |

### Impinger 3

|                           |              |              |              |
|---------------------------|--------------|--------------|--------------|
| Final Weight, grams/mls   | <u>604.4</u> | <u>598.6</u> | <u>604.9</u> |
| Initial Weight, grams/mls | <u>604.4</u> | <u>598.8</u> | <u>604.4</u> |
| Condensed Water, grams    | <u>0.0</u>   | <u>-0.2</u>  | <u>0.5</u>   |

Condensed Water, grams                                 

### Silica Gel

|                       |              |              |              |
|-----------------------|--------------|--------------|--------------|
| Final Weight, grams   | <u>838.0</u> | <u>825.2</u> | <u>837.9</u> |
| Initial Weight, grams | <u>833.4</u> | <u>822.3</u> | <u>836.0</u> |
| Adsorbed Water, grams | <u>2.6</u>   | <u>2.9</u>   | <u>1.9</u>   |

Adsorbed Water, grams — — —

Total Water, grams 24.3 27.8 19.9

$Vm(std) = \text{Volume of gas sampled at standard conditions (dscf)}$   
 $Vm(std) = ((\text{Gamma} * 17.64 * Vm * (Pbar + (\Delta H / 13.6))) / (Tm + 460))$   
 $Vwc(std) = \text{volume of water vapor at standard conditions (scf)}$   
 $Vwc(std) = (0.04707) * (\text{volume of water collected (mls)})$   
 $Bws = \text{Mole fraction of water vapor}$   
 $Bws = Vwc(std) / (Vm(std) + Vwc(std))$   
 $\text{Percent Moisture} = 100 * Bws$



# Method 4 - Air Control Techniques, P.C.

Date

## Identification Information

Client **ENVIVA**  
Plant Name **Wiggins**  
City **Wiggins**

Job **1911**  
Process **ASPIRATOR**  
State **MS**

## Sampling Information

Run Number  
Sampling Date  
Recovery Date  
Personnel **TB JBG**

Balance Number  
Balance Type  
Balance Level  
Recovery Area

## Location Moisture Data

Run Number **16** **17** **18**

### Impinger 1

|                           |              |              |              |
|---------------------------|--------------|--------------|--------------|
| Final Weight, grams/mls   | <b>914.9</b> | <b>958.8</b> | <b>946.7</b> |
| Initial Weight, grams/mls | <b>787.3</b> | <b>760.0</b> | <b>743.8</b> |
| Condensed Water, grams    | <b>127.6</b> | <b>198.8</b> | <b>202.9</b> |

### Impinger 2

|                           |              |              |              |
|---------------------------|--------------|--------------|--------------|
| Final Weight, grams/mls   | <b>877.1</b> | <b>790.3</b> | <b>814.9</b> |
| Initial Weight, grams/mls | <b>754.0</b> | <b>722.9</b> | <b>746.0</b> |
| Condensed Water, grams    | <b>123.1</b> | <b>67.4</b>  | <b>68.9</b>  |

### Impinger 3

|                           |              |              |              |
|---------------------------|--------------|--------------|--------------|
| Final Weight, grams/mls   | <b>599.7</b> | <b>605.0</b> | <b>600.3</b> |
| Initial Weight, grams/mls | <b>598.6</b> | <b>604.9</b> | <b>599.7</b> |
| Condensed Water, grams    | <b>1.1</b>   | <b>0.1</b>   | <b>0.6</b>   |

Condensed Water, grams

### Silica Gel

|                       |              |              |              |
|-----------------------|--------------|--------------|--------------|
| Final Weight, grams   | <b>830.2</b> | <b>841.2</b> | <b>832.2</b> |
| Initial Weight, grams | <b>825.2</b> | <b>837.9</b> | <b>830.2</b> |
| Adsorbed Water, grams | <b>5.0</b>   | <b>3.3</b>   | <b>2.0</b>   |

Adsorbed Water, grams

Total Water, grams **256.8** **269.6** **274.4**

$Vm(std) = \text{Volume of gas sampled at standard conditions (dscf)}$   
 $Vm(std) = ((\text{Gamma} * 17.64 * Vm * (Pbar + (\Delta H / 13.6))) / (Tm + 460))$   
 $Vwc(std) = \text{volume of water vapor at standard conditions (scf)}$   
 $Vwc(std) = (0.04707) * (\text{volume of water collected (mls)})$   
 $Bws = \text{Mole fraction of water vapor}$   
 $Bws = Vwc(std) / (Vm(std) + Vwc(std))$   
 $\text{Percent Moisture} = 100 * Bws$

**24.7**  
**1016**

**Air Control Techniques, P.C.**  
**Moisture Sampling Train Field Data Sheet**

Date 10/12/13

| SOURCE IDENTIFICATION |                        | EQUIPMENT IDENTIFICATION |        |
|-----------------------|------------------------|--------------------------|--------|
| Facility              | ENVIVA                 | Umbilical ID             | 30     |
| City, State           | Wiggins, MS            | Meterbox ID              | 48033  |
| Test Location         | Relief M. H. Aspirator | $\Delta H @$             | 1.917  |
| Personnel             | TIB JBG                | Gamma ( $\gamma$ )       | 0.9828 |

| Run Identification <u>M4-16</u> |                    |                                   |                  | Actual                |                  |                   | Req'd               |                 | Vac |  |
|---------------------------------|--------------------|-----------------------------------|------------------|-----------------------|------------------|-------------------|---------------------|-----------------|-----|--|
|                                 |                    |                                   |                  | Pre Leak Check        |                  |                   | < 0.02 or 4%        |                 | 12  |  |
|                                 |                    |                                   |                  | Post Leak Check       |                  |                   | < 0.02 or 4%        |                 | 9   |  |
| Clock Time                      | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.) | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |     |  |
| 1509                            | 0                  | 982.400                           | 83               | 1.0                   | N/A              | N/A               | 54                  | 3               |     |  |
| 1524                            | 15                 | 989.81                            | 85               |                       |                  |                   | 60                  | 3               |     |  |
| 1539                            | 30                 | 998.62                            | 86               |                       |                  |                   | 62                  | 3               |     |  |
| 1554                            | 45                 | 1007.31                           | 86               |                       |                  |                   | 65                  | 3               |     |  |
| 1609                            | 60                 | 1015.641                          |                  |                       |                  |                   |                     |                 |     |  |

| Run Identification <u>M4-17</u> |                    |                                   |                  | Actual                |                  |                   | Req'd               |                 | Vac |  |
|---------------------------------|--------------------|-----------------------------------|------------------|-----------------------|------------------|-------------------|---------------------|-----------------|-----|--|
|                                 |                    |                                   |                  | Pre Leak Check        |                  |                   | < 0.02 or 4%        |                 | 10  |  |
|                                 |                    |                                   |                  | Post Leak Check       |                  |                   | < 0.02 or 4%        |                 | 11  |  |
| Clock Time                      | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.) | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |     |  |
| 1636                            | 0                  | 16.000                            | 85               | 1.0                   | N/A              | N/A               | 56                  | 3               |     |  |
| 1651                            | 15                 | 24.21                             | 84               |                       |                  |                   | 65                  | 3               |     |  |
| 1706                            | 30                 | 32.27                             | 85               |                       |                  |                   | 59                  | 3               |     |  |
| 1721                            | 45                 | 40.18                             | 85               |                       |                  |                   | 61                  | 3               |     |  |
| 1736                            | 60                 | 48.149                            |                  |                       |                  |                   |                     |                 |     |  |

| Run Identification <u>M4-18</u> |                    |                                   |                  | Actual                |                  |                   | Req'd               |                 | Vac |  |
|---------------------------------|--------------------|-----------------------------------|------------------|-----------------------|------------------|-------------------|---------------------|-----------------|-----|--|
|                                 |                    |                                   |                  | Pre Leak Check        |                  |                   | < 0.02 or 4%        |                 | 12  |  |
|                                 |                    |                                   |                  | Post Leak Check       |                  |                   | < 0.02 or 4%        |                 | 8   |  |
| Clock Time                      | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.) | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |     |  |
| 1800                            | 0                  | 48.300                            | 84               | 1.0                   | N/A              | N/A               | 57                  | 3               |     |  |
| 1816                            | 15                 | 57.41                             | 82               |                       |                  |                   | 51                  | 3               |     |  |
| 1832                            | 30                 | 66.20                             | 81               |                       |                  |                   | 52                  | 3               |     |  |
| 1848                            | 45                 | 79.55                             | 80               |                       |                  |                   | 52                  | 3               |     |  |
| 1900                            | 60                 | 82.708                            |                  |                       |                  |                   |                     |                 |     |  |



**Air Control Techniques, P.C.**  
**Moisture Sampling Train Field Data Sheet**

Date 10/13/13

| SOURCE IDENTIFICATION |                    | EQUIPMENT IDENTIFICATION |               |
|-----------------------|--------------------|--------------------------|---------------|
| Facility              | <u>WIVA</u>        | Umbilical ID             | <u>200</u>    |
| City, State           | <u>Wiggins, MS</u> | Meterbox ID              | <u>981033</u> |
| Test Location         | <u>ISPER #2</u>    | $\Delta H @$             | <u>1.917</u>  |
| Personnel             | <u>115 JBG</u>     | Gamma ( $\gamma$ )       | <u>0.9828</u> |

| Run Identification <u>M4-19</u> |                    |                                   |                  | Actual                |                  | Req'd             |                     | Vac             |  |
|---------------------------------|--------------------|-----------------------------------|------------------|-----------------------|------------------|-------------------|---------------------|-----------------|--|
|                                 |                    |                                   |                  | Pre Leak Check        | <u>0.000</u>     | < 0.02 or 4%      | <u>15</u>           |                 |  |
|                                 |                    |                                   |                  | Post Leak Check       | <u>0.000</u>     | < 0.02 or 4%      | <u>10</u>           |                 |  |
| Clock Time                      | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.) | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |  |
| <u>921</u>                      | <u>0</u>           | <u>82.900</u>                     | <u>72</u>        | <u>1.0</u>            | <u>N/A</u>       | <u>N/A</u>        | <u>56</u>           | <u>3</u>        |  |
| <u>936</u>                      | <u>15</u>          | <u>90.93</u>                      | <u>76</u>        | <u>↓</u>              | <u>↓</u>         | <u>↓</u>          | <u>58</u>           | <u>3</u>        |  |
| <u>951</u>                      | <u>30</u>          | <u>99.15</u>                      | <u>79</u>        | <u>↓</u>              | <u>↓</u>         | <u>↓</u>          | <u>59</u>           | <u>3</u>        |  |
| <u>1006</u>                     | <u>45</u>          | <u>106.85</u>                     | <u>83</u>        | <u>↓</u>              | <u>↓</u>         | <u>↓</u>          | <u>60</u>           | <u>3</u>        |  |
| <u>1021</u>                     | <u>60</u>          | <u>114.788</u>                    |                  |                       |                  |                   |                     |                 |  |

| Run Identification <u>M4-20</u> |                    |                                   |                  | Actual                |                  | Req'd             |                     | Vac             |  |
|---------------------------------|--------------------|-----------------------------------|------------------|-----------------------|------------------|-------------------|---------------------|-----------------|--|
|                                 |                    |                                   |                  | Pre Leak Check        | <u>0.000</u>     | < 0.02 or 4%      | <u>2</u>            |                 |  |
|                                 |                    |                                   |                  | Post Leak Check       | <u>0.000</u>     | < 0.02 or 4%      | <u>2</u>            |                 |  |
| Clock Time                      | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.) | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |  |
| <u>1104</u>                     | <u>0</u>           | <u>115.000</u>                    | <u>88</u>        | <u>1.0</u>            | <u>N/A</u>       | <u>N/A</u>        | <u>57</u>           | <u>3</u>        |  |
| <u>1119</u>                     | <u>15</u>          | <u>123.65</u>                     | <u>89</u>        | <u>↓</u>              | <u>↓</u>         | <u>↓</u>          | <u>61</u>           | <u>3</u>        |  |
| <u>1134</u>                     | <u>30</u>          | <u>131.96</u>                     | <u>90</u>        | <u>↓</u>              | <u>↓</u>         | <u>↓</u>          | <u>61</u>           | <u>3</u>        |  |
| <u>1149</u>                     | <u>45</u>          | <u>140.32</u>                     | <u>91</u>        | <u>↓</u>              | <u>↓</u>         | <u>↓</u>          | <u>56</u>           | <u>3</u>        |  |
| <u>1204</u>                     | <u>60</u>          | <u>148.650</u>                    |                  |                       |                  |                   |                     |                 |  |

| Run Identification <u>M4-21</u> |                    |                                   |                  | Actual                |                  | Req'd             |                     | Vac             |  |
|---------------------------------|--------------------|-----------------------------------|------------------|-----------------------|------------------|-------------------|---------------------|-----------------|--|
|                                 |                    |                                   |                  | Pre Leak Check        | <u>0.000</u>     | < 0.02 or 4%      | <u>10</u>           |                 |  |
|                                 |                    |                                   |                  | Post Leak Check       |                  | < 0.02 or 4%      |                     |                 |  |
| Clock Time                      | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.) | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |  |
| <u>1231</u>                     | <u>0</u>           | <u>149.200</u>                    | <u>89</u>        | <u>1.0</u>            | <u>N/A</u>       | <u>N/A</u>        | <u>51</u>           | <u>3</u>        |  |
| <u>1301</u>                     | <u>15</u>          | <u>157.72</u>                     | <u>90</u>        | <u>↓</u>              | <u>↓</u>         | <u>↓</u>          | <u>58</u>           | <u>4</u>        |  |
| <u>1316</u>                     | <u>30</u>          | <u>166.39</u>                     | <u>91</u>        | <u>↓</u>              | <u>↓</u>         | <u>↓</u>          | <u>60</u>           | <u>7</u>        |  |
| <u>1346</u>                     | <u>45</u>          | <u>172.82</u>                     | <u>91</u>        | <u>↓</u>              | <u>↓</u>         | <u>↓</u>          | <u>59</u>           | <u>10</u>       |  |
| <u>1346</u>                     | <u>60</u>          | <u>179.996</u>                    |                  |                       |                  |                   |                     |                 |  |

off 1238 upset condition  
 ON 1252

# Method 4 - Air Control Techniques, P.C.

Date 10/13/13

29.85  
15224

## Identification Information

|            |         |         |          |
|------------|---------|---------|----------|
| Client     | ENVIVA  | Job     | 1911     |
| Plant Name | Wiggins | Process | DRYER #2 |
| City       | Wiggins | State   | MS       |

## Sampling Information

|               |  |                |            |
|---------------|--|----------------|------------|
| Run Number    |  | Balance Number | V1200      |
| Sampling Date |  | Balance Type   | Electronic |
| Recovery Date |  | Balance Level  | ✓          |
| Personnel     |  | Recovery Area  | ✓          |

## Location Moisture Data

|                           |       |                  |       |
|---------------------------|-------|------------------|-------|
| Run Number                | 19    | 20               | 21    |
| <u>Impinger 1</u>         |       |                  |       |
| Final Weight, grams/mls   | 970.0 | 908.2            | 922.2 |
| Initial Weight, grams/mls | 749.2 | 748.2            | 681.2 |
| Condensed Water, grams    | 220.8 | 160              | 241.0 |
| <u>Impinger 2</u>         |       |                  |       |
| Final Weight, grams/mls   | 829.0 | 800.3            | 687.8 |
| Initial Weight, grams/mls | 790.3 | 680.0            | 674.0 |
| Condensed Water, grams    | 38.7  | 120.3            | 13.8  |
| <u>Impinger 3</u>         |       |                  |       |
| Final Weight, grams/mls   | 609.3 | <del>603.1</del> | 612.5 |
| Initial Weight, grams/mls | 605.0 | 600.4            | 609.3 |
| Condensed Water, grams    | 4.3   | 2.7              | 3.2   |
| Condensed Water, grams    |       |                  |       |
| <u>Silica Gel</u>         |       |                  |       |
| Final Weight, grams       | 845.1 | 835.7            | 847.1 |
| Initial Weight, grams     | 841.2 | 832.2            | 845.1 |
| Adsorbed Water, grams     | 3.9   | 3.5              | 2.0   |
| Adsorbed Water, grams     |       |                  |       |
| Total Water, grams        | 267.7 | 286.5            | 260.0 |

$V_m(\text{std})$  = Volume of gas sampled at standard conditions (dscf)

$V_m(\text{std}) = ((\text{Gamma} * 17.64 * V_m * (\text{Pbar} + (\Delta H / 13.6))) / (T_m + 460))$

$V_{wc}(\text{std})$  = volume of water vapor at standard conditions (scf)

$V_{wc}(\text{std}) = (0.04707) * (\text{volume of water collected (mls)})$

Bws = Mole fraction of water vapor

$Bws = V_{wc}(\text{std}) / (V_m(\text{std}) + V_{wc}(\text{std}))$

Percent Moisture =  $100 * Bws$

## **APPENDIX B**

### **Method 25A Data**

Test Run 1 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Wiggins

THC

ppm

Start Averaging

|            |          |      |
|------------|----------|------|
| 10/10/2013 | 10:17:27 | 29.2 |
| 10/10/2013 | 10:18:26 | 29.1 |
| 10/10/2013 | 10:19:26 | 29.4 |
| 10/10/2013 | 10:20:26 | 28.5 |
| 10/10/2013 | 10:21:26 | 29.2 |
| 10/10/2013 | 10:22:27 | 29.8 |
| 10/10/2013 | 10:23:27 | 30.5 |
| 10/10/2013 | 10:24:27 | 31.5 |
| 10/10/2013 | 10:25:27 | 30.8 |
| 10/10/2013 | 10:26:26 | 29.3 |
| 10/10/2013 | 10:27:26 | 29.3 |
| 10/10/2013 | 10:28:26 | 28.9 |
| 10/10/2013 | 10:29:27 | 29.5 |
| 10/10/2013 | 10:30:27 | 31.4 |
| 10/10/2013 | 10:31:27 | 31.1 |
| 10/10/2013 | 10:32:26 | 31.3 |
| 10/10/2013 | 10:33:26 | 31.2 |
| 10/10/2013 | 10:34:26 | 30.4 |
| 10/10/2013 | 10:35:27 | 30.4 |
| 10/10/2013 | 10:36:27 | 30.1 |
| 10/10/2013 | 10:37:27 | 29.7 |
| 10/10/2013 | 10:38:27 | 30.2 |
| 10/10/2013 | 10:39:26 | 29.2 |
| 10/10/2013 | 10:40:26 | 30.1 |
| 10/10/2013 | 10:41:26 | 30.3 |
| 10/10/2013 | 10:42:26 | 29.1 |
| 10/10/2013 | 10:43:27 | 29.5 |
| 10/10/2013 | 10:44:27 | 30.6 |
| 10/10/2013 | 10:45:27 | 29.7 |
| 10/10/2013 | 10:46:25 | 31   |
| 10/10/2013 | 10:47:26 | 30.1 |
| 10/10/2013 | 10:48:26 | 30.7 |
| 10/10/2013 | 10:49:26 | 31.6 |
| 10/10/2013 | 10:50:27 | 31.6 |
| 10/10/2013 | 10:51:27 | 32.3 |
| 10/10/2013 | 10:52:27 | 31.4 |
| 10/10/2013 | 10:53:27 | 30.4 |
| 10/10/2013 | 10:54:26 | 31.9 |
| 10/10/2013 | 10:55:26 | 31.8 |
| 10/10/2013 | 10:56:26 | 33.1 |
| 10/10/2013 | 10:57:26 | 32.8 |
| 10/10/2013 | 10:58:27 | 31.8 |
| 10/10/2013 | 10:59:27 | 32.5 |
| 10/10/2013 | 11:00:27 | 32.8 |
| 10/10/2013 | 11:01:26 | 30.2 |



|                |            |      |
|----------------|------------|------|
| 10/10/2013     | 11:02:26   | 31.2 |
| 10/10/2013     | 11:03:26   | 30.7 |
| 10/10/2013     | 11:04:26   | 31.2 |
| 10/10/2013     | 11:05:27   | 32.7 |
| 10/10/2013     | 11:06:27   | 31.6 |
| 10/10/2013     | 11:07:27   | 31.2 |
| 10/10/2013     | 11:08:25   | 32.5 |
| 10/10/2013     | 11:09:26   | 31   |
| 10/10/2013     | 11:10:26   | 30.8 |
| 10/10/2013     | 11:11:26   | 28.9 |
| 10/10/2013     | 11:12:26   | 30.9 |
| 10/10/2013     | 11:13:27   | 31.9 |
| 10/10/2013     | 11:14:27   | 32.1 |
| 10/10/2013     | 11:15:27   | 32.6 |
| 10/10/2013     | 11:16:26   | 34   |
| Average        | 1807 sampl | 30.8 |
| Test Run 1 End |            |      |

Test Run 2 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Wiggins

THC

ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/10/2013 | 10:37:12 | 33.22 |
| 10/10/2013 | 10:38:13 | 32.73 |
| 10/10/2013 | 10:39:13 | 33.22 |
| 10/10/2013 | 10:40:13 | 33.21 |
| 10/10/2013 | 10:41:13 | 31.78 |
| 10/10/2013 | 10:42:14 | 29.83 |
| 10/10/2013 | 10:43:14 | 31.37 |
| 10/10/2013 | 10:44:12 | 31.5  |
| 10/10/2013 | 10:45:13 | 33.24 |
| 10/10/2013 | 10:46:13 | 32.96 |
| 10/10/2013 | 10:47:13 | 32.52 |
| 10/10/2013 | 10:48:13 | 32.17 |
| 10/10/2013 | 10:49:14 | 31.8  |
| 10/10/2013 | 10:50:14 | 30.68 |
| 10/10/2013 | 10:51:12 | 29.76 |
| 10/10/2013 | 10:52:12 | 31.03 |
| 10/10/2013 | 10:53:13 | 31.9  |
| 10/10/2013 | 10:54:13 | 32.57 |
| 10/10/2013 | 10:55:13 | 32.4  |
| 10/10/2013 | 10:56:14 | 32.68 |
| 10/10/2013 | 10:57:14 | 33.18 |
| 10/10/2013 | 10:58:12 | 33.26 |
| 10/10/2013 | 10:59:12 | 32.76 |
| 10/10/2013 | 11:00:13 | 31.1  |
| 10/10/2013 | 11:01:12 | 30.85 |
| 10/10/2013 | 11:02:14 | 30.84 |
| 10/10/2013 | 11:03:13 | 30.27 |
| 10/10/2013 | 11:04:12 | 30.6  |
| 10/10/2013 | 11:05:14 | 32.18 |
| 10/10/2013 | 11:06:13 | 30.96 |
| 10/10/2013 | 11:07:12 | 31.41 |
| 10/10/2013 | 11:08:12 | 30.82 |
| 10/10/2013 | 11:09:13 | 31.24 |
| 10/10/2013 | 11:10:13 | 31.94 |
| 10/10/2013 | 11:11:14 | 31.25 |
| 10/10/2013 | 11:12:13 | 30.81 |
| 10/10/2013 | 11:13:12 | 32.84 |
| 10/10/2013 | 11:14:12 | 32.11 |
| 10/10/2013 | 11:15:14 | 32.71 |
| 10/10/2013 | 11:16:13 | 32.57 |
| 10/10/2013 | 11:17:12 | 33.7  |
| 10/10/2013 | 11:18:14 | 33.87 |
| 10/10/2013 | 11:19:13 | 32.8  |
| 10/10/2013 | 11:20:13 | 31.93 |
| 10/10/2013 | 11:21:14 | 33.89 |

|            |          |       |
|------------|----------|-------|
| 10/10/2013 | 11:22:13 | 33.12 |
| 10/10/2013 | 11:23:13 | 32.56 |
| 10/10/2013 | 11:24:14 | 32.31 |
| 10/10/2013 | 11:25:13 | 33.49 |
| 10/10/2013 | 11:26:12 | 34.83 |
| 10/10/2013 | 11:27:14 | 34.8  |
| 10/10/2013 | 11:28:13 | 33.96 |
| 10/10/2013 | 11:29:13 | 33.5  |
| 10/10/2013 | 11:30:14 | 34.21 |
| 10/10/2013 | 11:31:13 | 32.7  |
| 10/10/2013 | 11:32:13 | 31.67 |
| 10/10/2013 | 11:33:12 | 31.32 |
| 10/10/2013 | 11:34:13 | 31.95 |
| 10/10/2013 | 11:35:13 | 31.59 |
| 10/10/2013 | 11:36:14 | 31.24 |
| 10/10/2013 | 11:37:13 | 32.88 |

Test Run 3 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Wiggins

THC

ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/10/2013 | 11:51:37 | 27.47 |
| 10/10/2013 | 11:52:37 | 25.81 |
| 10/10/2013 | 11:53:37 | 25.62 |
| 10/10/2013 | 11:54:38 | 26.13 |
| 10/10/2013 | 11:55:36 | 27.21 |
| 10/10/2013 | 11:56:36 | 27.54 |
| 10/10/2013 | 11:57:36 | 27.06 |
| 10/10/2013 | 11:58:37 | 27.89 |
| 10/10/2013 | 11:59:37 | 27.66 |
| 10/10/2013 | 12:00:37 | 26.76 |
| 10/10/2013 | 12:01:38 | 26.92 |
| 10/10/2013 | 12:02:38 | 26.42 |
| 10/10/2013 | 12:03:36 | 25.01 |
| 10/10/2013 | 12:04:36 | 25.47 |
| 10/10/2013 | 12:05:37 | 25.98 |
| 10/10/2013 | 12:06:37 | 26.95 |
| 10/10/2013 | 12:07:37 | 27.79 |
| 10/10/2013 | 12:08:37 | 26.71 |
| 10/10/2013 | 12:09:38 | 27.38 |
| 10/10/2013 | 12:10:38 | 27.84 |
| 10/10/2013 | 12:11:36 | 25.99 |
| 10/10/2013 | 12:12:36 | 25.7  |
| 10/10/2013 | 12:13:37 | 24.64 |
| 10/10/2013 | 12:14:37 | 25.2  |
| 10/10/2013 | 12:15:37 | 25.22 |
| 10/10/2013 | 12:16:37 | 24.65 |
| 10/10/2013 | 12:17:38 | 24.05 |
| 10/10/2013 | 12:18:36 | 23.8  |
| 10/10/2013 | 12:19:36 | 22.94 |
| 10/10/2013 | 12:20:36 | 23.17 |
| 10/10/2013 | 12:21:37 | 24.1  |
| 10/10/2013 | 12:22:37 | 25.63 |
| 10/10/2013 | 12:23:37 | 26.37 |
| 10/10/2013 | 12:24:37 | 26.85 |
| 10/10/2013 | 12:25:38 | 26.02 |
| 10/10/2013 | 12:26:36 | 25.65 |
| 10/10/2013 | 12:27:36 | 25.72 |
| 10/10/2013 | 12:28:37 | 27.03 |
| 10/10/2013 | 12:29:37 | 26.23 |
| 10/10/2013 | 12:30:37 | 25.87 |
| 10/10/2013 | 12:31:37 | 25.97 |
| 10/10/2013 | 12:32:38 | 25.53 |
| 10/10/2013 | 12:33:38 | 25.25 |
| 10/10/2013 | 12:34:36 | 26.76 |
| 10/10/2013 | 12:35:36 | 27.16 |

|                |            |       |
|----------------|------------|-------|
| 10/10/2013     | 12:36:37   | 27.29 |
| 10/10/2013     | 12:37:37   | 27.02 |
| 10/10/2013     | 12:38:37   | 27.31 |
| 10/10/2013     | 12:39:37   | 28.11 |
| 10/10/2013     | 12:40:38   | 28.86 |
| 10/10/2013     | 12:41:36   | 28.19 |
| 10/10/2013     | 12:42:36   | 27.22 |
| 10/10/2013     | 12:43:37   | 27.74 |
| 10/10/2013     | 12:44:37   | 28.08 |
| 10/10/2013     | 12:45:37   | 26.91 |
| 10/10/2013     | 12:46:38   | 26.97 |
| 10/10/2013     | 12:47:38   | 27.99 |
| 10/10/2013     | 12:48:36   | 27.63 |
| 10/10/2013     | 12:49:36   | 26.3  |
| 10/10/2013     | 12:50:37   | 25.95 |
| Average        | 1802 sampl | 26.38 |
| Test Run 3 End |            |       |

Test Run 4 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Wiggins

THC

ppm

Start Averaging

|            |          |      |
|------------|----------|------|
| 10/10/2013 | 17:39:30 | 73.6 |
| 10/10/2013 | 17:40:31 | 73.7 |
| 10/10/2013 | 17:41:31 | 74.2 |
| 10/10/2013 | 17:42:31 | 74.3 |
| 10/10/2013 | 17:43:31 | 74.4 |
| 10/10/2013 | 17:44:32 | 74.6 |
| 10/10/2013 | 17:45:32 | 75.3 |
| 10/10/2013 | 17:46:32 | 75.7 |
| 10/10/2013 | 17:47:30 | 75.7 |
| 10/10/2013 | 17:48:31 | 75.6 |
| 10/10/2013 | 17:49:31 | 75   |
| 10/10/2013 | 17:50:31 | 74.2 |
| 10/10/2013 | 17:51:31 | 72.5 |
| 10/10/2013 | 17:52:32 | 71.5 |
| 10/10/2013 | 17:53:32 | 70.7 |
| 10/10/2013 | 17:54:30 | 70   |
| 10/10/2013 | 17:55:30 | 69.3 |
| 10/10/2013 | 17:56:31 | 68.6 |
| 10/10/2013 | 17:57:31 | 68   |
| 10/10/2013 | 17:58:31 | 67.7 |
| 10/10/2013 | 17:59:32 | 67.1 |
| 10/10/2013 | 18:00:32 | 66.8 |
| 10/10/2013 | 18:01:30 | 66.4 |
| 10/10/2013 | 18:02:30 | 66   |
| 10/10/2013 | 18:03:31 | 65   |
| 10/10/2013 | 18:04:31 | 64.5 |
| 10/10/2013 | 18:05:31 | 64.3 |
| 10/10/2013 | 18:06:31 | 64.1 |
| 10/10/2013 | 18:07:32 | 64.8 |
| 10/10/2013 | 18:08:32 | 65.5 |
| 10/10/2013 | 18:09:30 | 65.6 |
| 10/10/2013 | 18:10:31 | 65.7 |
| 10/10/2013 | 18:11:31 | 65.8 |
| 10/10/2013 | 18:12:31 | 65.8 |
| 10/10/2013 | 18:13:31 | 66.6 |
| 10/10/2013 | 18:14:32 | 66.7 |
| 10/10/2013 | 18:15:32 | 67   |
| 10/10/2013 | 18:16:30 | 67   |
| 10/10/2013 | 18:17:30 | 66.2 |
| 10/10/2013 | 18:18:31 | 65.5 |
| 10/10/2013 | 18:19:31 | 65   |
| 10/10/2013 | 18:20:31 | 64.5 |
| 10/10/2013 | 18:21:32 | 63.4 |
| 10/10/2013 | 18:22:32 | 62.8 |
| 10/10/2013 | 18:23:30 | 62.2 |

|                |            |      |
|----------------|------------|------|
| 10/10/2013     | 18:24:30   | 62   |
| 10/10/2013     | 18:25:31   | 62.2 |
| 10/10/2013     | 18:26:31   | 62.2 |
| 10/10/2013     | 18:27:31   | 62.6 |
| 10/10/2013     | 18:28:31   | 62.4 |
| 10/10/2013     | 18:29:32   | 61.7 |
| 10/10/2013     | 18:30:32   | 61.8 |
| 10/10/2013     | 18:31:30   | 61.4 |
| 10/10/2013     | 18:32:30   | 61.5 |
| 10/10/2013     | 18:33:31   | 61.3 |
| 10/10/2013     | 18:34:31   | 61.3 |
| 10/10/2013     | 18:35:31   | 61.1 |
| 10/10/2013     | 18:36:31   | 61.3 |
| 10/10/2013     | 18:37:32   | 60.8 |
| 10/10/2013     | 18:38:30   | 60.2 |
| 10/10/2013     | 18:39:30   | 60.4 |
| Average        | 1837 sampl | 66.7 |
| Test Run 4 End |            |      |

Test Run 5 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Wiggins

THC

ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/11/2013 | 10:00:39 | 59.48 |
| 10/11/2013 | 10:01:40 | 59.35 |
| 10/11/2013 | 10:02:40 | 59.64 |
| 10/11/2013 | 10:03:40 | 59.19 |
| 10/11/2013 | 10:04:40 | 59.7  |
| 10/11/2013 | 10:05:41 | 60.45 |
| 10/11/2013 | 10:06:41 | 60.54 |
| 10/11/2013 | 10:07:41 | 60.86 |
| 10/11/2013 | 10:08:40 | 61.28 |
| 10/11/2013 | 10:09:40 | 62.22 |
| 10/11/2013 | 10:10:40 | 62.62 |
| 10/11/2013 | 10:11:40 | 62.46 |
| 10/11/2013 | 10:12:40 | 62.22 |
| 10/11/2013 | 10:13:41 | 61.96 |
| 10/11/2013 | 10:14:41 | 61.71 |
| 10/11/2013 | 10:15:39 | 61.79 |
| 10/11/2013 | 10:16:40 | 61.65 |
| 10/11/2013 | 10:17:40 | 61.76 |
| 10/11/2013 | 10:18:40 | 61.82 |
| 10/11/2013 | 10:19:40 | 61.41 |
| 10/11/2013 | 10:20:41 | 60.91 |
| 10/11/2013 | 10:21:41 | 60.34 |
| 10/11/2013 | 10:22:41 | 60.35 |
| 10/11/2013 | 10:23:39 | 60.17 |
| 10/11/2013 | 10:24:40 | 60.48 |
| 10/11/2013 | 10:25:40 | 60.31 |
| 10/11/2013 | 10:26:40 | 60.03 |
| 10/11/2013 | 10:27:40 | 60.26 |
| 10/11/2013 | 10:28:41 | 60.17 |
| 10/11/2013 | 10:29:41 | 59.83 |
| 10/11/2013 | 10:30:41 | 59.58 |
| 10/11/2013 | 10:31:40 | 60.56 |
| 10/11/2013 | 10:32:40 | 60.96 |
| 10/11/2013 | 10:33:40 | 60.79 |
| 10/11/2013 | 10:34:40 | 61.26 |
| 10/11/2013 | 10:35:41 | 61.22 |
| 10/11/2013 | 10:36:41 | 61.09 |
| 10/11/2013 | 10:37:41 | 61.12 |
| 10/11/2013 | 10:38:39 | 61.86 |
| 10/11/2013 | 10:39:40 | 62.32 |
| 10/11/2013 | 10:40:40 | 62.49 |
| 10/11/2013 | 10:41:40 | 62.15 |
| 10/11/2013 | 10:42:41 | 62.22 |
| 10/11/2013 | 10:43:41 | 62.04 |
| 10/11/2013 | 10:44:41 | 61.73 |



|                |            |       |
|----------------|------------|-------|
| 10/11/2013     | 10:45:41   | 60.99 |
| 10/11/2013     | 10:46:40   | 61.3  |
| 10/11/2013     | 10:47:40   | 61.17 |
| 10/11/2013     | 10:48:40   | 62.35 |
| 10/11/2013     | 10:49:40   | 63.58 |
| 10/11/2013     | 10:50:41   | 63.57 |
| 10/11/2013     | 10:51:41   | 65.12 |
| 10/11/2013     | 10:52:41   | 67.32 |
| 10/11/2013     | 10:53:39   | 67.58 |
| 10/11/2013     | 10:54:40   | 67.4  |
| 10/11/2013     | 10:55:40   | 66.77 |
| 10/11/2013     | 10:56:40   | 66    |
| 10/11/2013     | 10:57:40   | 65.74 |
| 10/11/2013     | 10:58:41   | 64.85 |
| 10/11/2013     | 10:59:41   | 64.09 |
| Average        | 1810 sampl | 61.92 |
| Test Run 5 End |            |       |

Test Run 6 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Wiggins

THC

ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/11/2013 | 11:37:39 | 62.85 |
| 10/11/2013 | 11:38:39 | 63.21 |
| 10/11/2013 | 11:39:40 | 63.49 |
| 10/11/2013 | 11:40:38 | 63.72 |
| 10/11/2013 | 11:41:38 | 64.5  |
| 10/11/2013 | 11:42:38 | 65.32 |
| 10/11/2013 | 11:43:39 | 66.16 |
| 10/11/2013 | 11:44:39 | 66.6  |
| 10/11/2013 | 11:45:39 | 66.81 |
| 10/11/2013 | 11:46:40 | 66.6  |
| 10/11/2013 | 11:47:38 | 64.85 |
| 10/11/2013 | 11:48:38 | 62.59 |
| 10/11/2013 | 11:49:38 | 60.21 |
| 10/11/2013 | 11:50:38 | 58.27 |
| 10/11/2013 | 11:51:39 | 56.95 |
| 10/11/2013 | 11:52:39 | 55.02 |
| 10/11/2013 | 11:53:39 | 53.86 |
| 10/11/2013 | 11:54:39 | 52.91 |
| 10/11/2013 | 11:55:40 | 52.4  |
| 10/11/2013 | 11:56:38 | 52.38 |
| 10/11/2013 | 11:57:38 | 52.86 |
| 10/11/2013 | 11:58:39 | 53.87 |
| 10/11/2013 | 11:59:39 | 54.56 |
| 10/11/2013 | 12:00:39 | 53.55 |
| 10/11/2013 | 12:01:39 | 52.72 |
| 10/11/2013 | 12:02:39 | 52.05 |
| 10/11/2013 | 12:03:40 | 51.53 |
| 10/11/2013 | 12:04:38 | 51.4  |
| 10/11/2013 | 12:05:38 | 52.07 |
| 10/11/2013 | 12:06:38 | 52.86 |
| 10/11/2013 | 12:07:39 | 53.12 |
| 10/11/2013 | 12:08:39 | 53.31 |
| 10/11/2013 | 12:09:39 | 52.77 |
| 10/11/2013 | 12:10:40 | 51.76 |
| 10/11/2013 | 12:11:40 | 51.02 |
| 10/11/2013 | 12:12:38 | 51.05 |
| 10/11/2013 | 12:13:38 | 52.13 |
| 10/11/2013 | 12:14:39 | 52.93 |
| 10/11/2013 | 12:15:39 | 53.34 |
| 10/11/2013 | 12:16:39 | 53.7  |
| 10/11/2013 | 12:17:39 | 53.91 |
| 10/11/2013 | 12:18:40 | 54.85 |
| 10/11/2013 | 12:19:38 | 55.39 |
| 10/11/2013 | 12:20:38 | 55.82 |
| 10/11/2013 | 12:21:38 | 55.66 |

|                |            |       |
|----------------|------------|-------|
| 10/11/2013     | 12:22:39   | 55.8  |
| 10/11/2013     | 12:23:39   | 56.58 |
| 10/11/2013     | 12:24:39   | 57.45 |
| 10/11/2013     | 12:25:40   | 58.57 |
| 10/11/2013     | 12:26:40   | 59.56 |
| 10/11/2013     | 12:27:38   | 60.26 |
| 10/11/2013     | 12:28:38   | 60.52 |
| 10/11/2013     | 12:29:39   | 60.23 |
| 10/11/2013     | 12:30:39   | 59.97 |
| 10/11/2013     | 12:31:39   | 59.98 |
| 10/11/2013     | 12:32:39   | 58.38 |
| 10/11/2013     | 12:33:40   | 57.52 |
| 10/11/2013     | 12:34:38   | 58.26 |
| 10/11/2013     | 12:35:38   | 59.53 |
| 10/11/2013     | 12:36:38   | 60.41 |
| Average        | 1796 sampl | 57.17 |
| Test Run 6 End |            |       |

Test Run 7 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Wiggins

THC

ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/11/2013 | 13:43:41 | 29.28 |
| 10/11/2013 | 13:44:42 | 27.18 |
| 10/11/2013 | 13:45:42 | 25.85 |
| 10/11/2013 | 13:46:40 | 24.55 |
| 10/11/2013 | 13:47:40 | 23.31 |
| 10/11/2013 | 13:48:41 | 22.64 |
| 10/11/2013 | 13:49:41 | 22.37 |
| 10/11/2013 | 13:50:41 | 22.49 |
| 10/11/2013 | 13:51:42 | 22.37 |
| 10/11/2013 | 13:52:42 | 22.04 |
| 10/11/2013 | 13:53:40 | 22.25 |
| 10/11/2013 | 13:54:40 | 22.98 |
| 10/11/2013 | 13:55:41 | 22.9  |
| 10/11/2013 | 13:56:41 | 22.72 |
| 10/11/2013 | 13:57:41 | 23.05 |
| 10/11/2013 | 13:58:42 | 23.38 |
| 10/11/2013 | 13:59:42 | 23.44 |
| 10/11/2013 | 14:00:40 | 24.2  |
| 10/11/2013 | 14:01:40 | 24.19 |
| 10/11/2013 | 14:02:41 | 23.32 |
| 10/11/2013 | 14:03:41 | 22.78 |
| 10/11/2013 | 14:04:41 | 22.4  |
| 10/11/2013 | 14:05:41 | 22.24 |
| 10/11/2013 | 14:06:42 | 22.53 |
| 10/11/2013 | 14:07:40 | 22.54 |
| 10/11/2013 | 14:08:40 | 22    |
| 10/11/2013 | 14:09:40 | 21.36 |
| 10/11/2013 | 14:10:41 | 20.81 |
| 10/11/2013 | 14:11:41 | 20.6  |
| 10/11/2013 | 14:12:41 | 20.52 |
| 10/11/2013 | 14:13:41 | 20.67 |
| 10/11/2013 | 14:14:42 | 21.18 |
| 10/11/2013 | 14:15:40 | 22.48 |
| 10/11/2013 | 14:16:40 | 23.46 |
| 10/11/2013 | 14:17:41 | 23.6  |
| 10/11/2013 | 14:18:41 | 24.02 |
| 10/11/2013 | 14:19:41 | 24.31 |
| 10/11/2013 | 14:20:41 | 24.25 |
| 10/11/2013 | 14:21:42 | 24.44 |
| 10/11/2013 | 14:22:42 | 24.59 |
| 10/11/2013 | 14:23:40 | 24.59 |
| 10/11/2013 | 14:24:40 | 25.03 |
| 10/11/2013 | 14:25:40 | 25.21 |
| 10/11/2013 | 14:26:41 | 25.16 |
| 10/11/2013 | 14:27:41 | 25.61 |

|                |            |       |
|----------------|------------|-------|
| 10/11/2013     | 14:28:41   | 25.91 |
| 10/11/2013     | 14:29:42   | 24.74 |
| 10/11/2013     | 14:30:42   | 24.82 |
| 10/11/2013     | 14:31:40   | 24.18 |
| 10/11/2013     | 14:32:40   | 23.94 |
| 10/11/2013     | 14:33:41   | 24.63 |
| 10/11/2013     | 14:34:41   | 25.19 |
| 10/11/2013     | 14:35:41   | 25.92 |
| 10/11/2013     | 14:36:41   | 26.43 |
| 10/11/2013     | 14:37:42   | 25.26 |
| 10/11/2013     | 14:38:42   | 24.93 |
| 10/11/2013     | 14:39:40   | 25.61 |
| 10/11/2013     | 14:40:40   | 25.25 |
| 10/11/2013     | 14:41:41   | 24.92 |
| 10/11/2013     | 14:42:41   | 24.81 |
| Average        | 1795 sampl | 23.8  |
| Test Run 7 End |            |       |

Test Run 8 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Wiggins

THC

ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/11/2013 | 15:08:58 | 20.89 |
| 10/11/2013 | 15:09:58 | 21.18 |
| 10/11/2013 | 15:10:56 | 21.36 |
| 10/11/2013 | 15:11:57 | 21.39 |
| 10/11/2013 | 15:12:57 | 21.49 |
| 10/11/2013 | 15:13:57 | 21.51 |
| 10/11/2013 | 15:14:58 | 21.66 |
| 10/11/2013 | 15:15:58 | 21.02 |
| 10/11/2013 | 15:16:58 | 20.12 |
| 10/11/2013 | 15:17:56 | 19.71 |
| 10/11/2013 | 15:18:57 | 19.67 |
| 10/11/2013 | 15:19:57 | 19.07 |
| 10/11/2013 | 15:20:57 | 19.24 |
| 10/11/2013 | 15:21:57 | 19.85 |
| 10/11/2013 | 15:22:58 | 20.21 |
| 10/11/2013 | 15:23:58 | 20.9  |
| 10/11/2013 | 15:24:56 | 21.72 |
| 10/11/2013 | 15:25:57 | 22.45 |
| 10/11/2013 | 15:26:57 | 23.3  |
| 10/11/2013 | 15:27:57 | 23.07 |
| 10/11/2013 | 15:28:57 | 22.47 |
| 10/11/2013 | 15:29:58 | 22.24 |
| 10/11/2013 | 15:30:58 | 22.14 |
| 10/11/2013 | 15:31:58 | 21.87 |
| 10/11/2013 | 15:32:56 | 22.09 |
| 10/11/2013 | 15:33:57 | 22.17 |
| 10/11/2013 | 15:34:57 | 22.55 |
| 10/11/2013 | 15:35:57 | 22.32 |
| 10/11/2013 | 15:36:57 | 21.72 |
| 10/11/2013 | 15:37:58 | 21.14 |
| 10/11/2013 | 15:38:58 | 21.1  |
| 10/11/2013 | 15:39:58 | 21.29 |
| 10/11/2013 | 15:40:56 | 21.44 |
| 10/11/2013 | 15:41:57 | 21.58 |
| 10/11/2013 | 15:42:57 | 22.64 |
| 10/11/2013 | 15:43:57 | 22.48 |
| 10/11/2013 | 15:44:57 | 22.65 |
| 10/11/2013 | 15:45:58 | 22.37 |
| 10/11/2013 | 15:46:58 | 22.73 |
| 10/11/2013 | 15:47:56 | 22.8  |
| 10/11/2013 | 15:48:57 | 22.34 |
| 10/11/2013 | 15:49:57 | 21.76 |
| 10/11/2013 | 15:50:57 | 21.83 |
| 10/11/2013 | 15:51:57 | 22.04 |
| 10/11/2013 | 15:52:58 | 22.15 |

|                |            |       |
|----------------|------------|-------|
| 10/11/2013     | 15:53:58   | 22.07 |
| 10/11/2013     | 15:54:58   | 22.66 |
| 10/11/2013     | 15:55:58   | 22.99 |
| 10/11/2013     | 15:56:57   | 22.84 |
| 10/11/2013     | 15:57:57   | 22.83 |
| 10/11/2013     | 15:58:57   | 22.2  |
| 10/11/2013     | 15:59:58   | 21.03 |
| 10/11/2013     | 16:00:58   | 19.77 |
| 10/11/2013     | 16:01:58   | 18.88 |
| 10/11/2013     | 16:02:56   | 18.32 |
| 10/11/2013     | 16:03:57   | 17.86 |
| 10/11/2013     | 16:04:57   | 18.62 |
| 10/11/2013     | 16:05:57   | 18.41 |
| 10/11/2013     | 16:06:57   | 18.6  |
| 10/11/2013     | 16:07:58   | 19.1  |
| Average        | 1796 sampl | 21.29 |
| Test Run 8 End |            |       |

Test Run 9 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Wiggins

THC

ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/11/2013 | 16:29:59 | 22.84 |
| 10/11/2013 | 16:30:59 | 21.54 |
| 10/11/2013 | 16:31:59 | 21.11 |
| 10/11/2013 | 16:33:00 | 21.4  |
| 10/11/2013 | 16:34:00 | 21.21 |
| 10/11/2013 | 16:35:00 | 21.39 |
| 10/11/2013 | 16:36:00 | 21.79 |
| 10/11/2013 | 16:36:59 | 23.24 |
| 10/11/2013 | 16:37:59 | 23.79 |
| 10/11/2013 | 16:38:59 | 24.8  |
| 10/11/2013 | 16:39:59 | 25.11 |
| 10/11/2013 | 16:41:00 | 26.01 |
| 10/11/2013 | 16:42:00 | 28.05 |
| 10/11/2013 | 16:43:00 | 29.59 |
| 10/11/2013 | 16:44:00 | 29.65 |
| 10/11/2013 | 16:44:59 | 29.74 |
| 10/11/2013 | 16:45:59 | 29.86 |
| 10/11/2013 | 16:46:59 | 33.48 |
| 10/11/2013 | 16:48:00 | 32.59 |
| 10/11/2013 | 16:49:00 | 28.94 |
| 10/11/2013 | 16:49:59 | 26.37 |
| 10/11/2013 | 16:50:59 | 25.7  |
| 10/11/2013 | 16:51:59 | 24.69 |
| 10/11/2013 | 16:53:00 | 24.55 |
| 10/11/2013 | 16:54:00 | 24.78 |
| 10/11/2013 | 16:55:00 | 25.37 |
| 10/11/2013 | 16:55:59 | 26.6  |
| 10/11/2013 | 16:56:59 | 27.42 |
| 10/11/2013 | 16:57:59 | 26.35 |
| 10/11/2013 | 16:58:59 | 25.6  |
| 10/11/2013 | 17:00:00 | 25.52 |
| 10/11/2013 | 17:01:00 | 25.32 |
| 10/11/2013 | 17:02:00 | 24.67 |
| 10/11/2013 | 17:03:00 | 24.39 |
| 10/11/2013 | 17:04:01 | 24.2  |
| 10/11/2013 | 17:04:59 | 23.43 |
| 10/11/2013 | 17:05:59 | 22.29 |
| 10/11/2013 | 17:06:59 | 21.55 |
| 10/11/2013 | 17:08:00 | 21.18 |
| 10/11/2013 | 17:09:00 | 21.33 |
| 10/11/2013 | 17:10:00 | 21.67 |
| 10/11/2013 | 17:10:59 | 21.91 |
| 10/11/2013 | 17:11:59 | 22.59 |
| 10/11/2013 | 17:12:59 | 22.87 |
| 10/11/2013 | 17:14:00 | 23.27 |



|                |            |       |
|----------------|------------|-------|
| 10/11/2013     | 17:15:00   | 23.85 |
| 10/11/2013     | 17:16:00   | 23.83 |
| 10/11/2013     | 17:17:00   | 23.05 |
| 10/11/2013     | 17:17:59   | 23.11 |
| 10/11/2013     | 17:18:59   | 23.12 |
| 10/11/2013     | 17:19:59   | 24.45 |
| 10/11/2013     | 17:21:00   | 24.59 |
| 10/11/2013     | 17:22:00   | 24.41 |
| 10/11/2013     | 17:23:00   | 24.36 |
| 10/11/2013     | 17:24:00   | 25.25 |
| 10/11/2013     | 17:24:59   | 25.58 |
| 10/11/2013     | 17:25:59   | 26.03 |
| 10/11/2013     | 17:26:59   | 26.29 |
| 10/11/2013     | 17:27:59   | 26.55 |
| 10/11/2013     | 17:29:00   | 26.07 |
| 10/11/2013     | 17:30:00   | 25.36 |
| 10/11/2013     | 17:31:00   | 24.68 |
| 10/11/2013     | 17:32:00   | 24.5  |
| 10/11/2013     | 17:32:59   | 24.26 |
| 10/11/2013     | 17:33:59   | 24.15 |
| Average        | 1951 sampl | 24.82 |
| Test Run 9 End |            |       |

Test Run 10 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Wiggins

THC

ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/11/2013 | 18:11:17 | 29.88 |
| 10/11/2013 | 18:12:18 | 33.18 |
| 10/11/2013 | 18:13:18 | 31    |
| 10/11/2013 | 18:14:18 | 22.29 |
| 10/11/2013 | 18:15:18 | 19.06 |
| 10/11/2013 | 18:16:19 | 19    |
| 10/11/2013 | 18:17:19 | 21.06 |
| 10/11/2013 | 18:18:19 | 23.21 |
| 10/11/2013 | 18:19:17 | 22.71 |
| 10/11/2013 | 18:20:18 | 23.92 |
| 10/11/2013 | 18:21:18 | 23.38 |
| 10/11/2013 | 18:22:18 | 22.46 |
| 10/11/2013 | 18:23:19 | 23.73 |
| 10/11/2013 | 18:24:19 | 27.16 |
| 10/11/2013 | 18:25:19 | 28.89 |
| 10/11/2013 | 18:26:17 | 27.17 |
| 10/11/2013 | 18:27:18 | 22.65 |
| 10/11/2013 | 18:28:18 | 22.36 |
| 10/11/2013 | 18:29:18 | 23.07 |
| 10/11/2013 | 18:30:18 | 23.39 |
| 10/11/2013 | 18:31:19 | 21.74 |
| 10/11/2013 | 18:32:19 | 21    |
| 10/11/2013 | 18:33:19 | 21.29 |
| 10/11/2013 | 18:34:17 | 20.98 |
| 10/11/2013 | 18:35:18 | 18.39 |
| 10/11/2013 | 18:36:18 | 18.16 |
| 10/11/2013 | 18:37:18 | 18.91 |
| 10/11/2013 | 18:38:19 | 19.32 |
| 10/11/2013 | 18:39:19 | 21.57 |
| 10/11/2013 | 18:40:19 | 25.3  |
| 10/11/2013 | 18:41:17 | 31.9  |
| 10/11/2013 | 18:42:18 | 38.29 |
| 10/11/2013 | 18:43:18 | 33.17 |
| 10/11/2013 | 18:44:18 | 31.99 |
| 10/11/2013 | 18:45:19 | 25.13 |
| 10/11/2013 | 18:46:19 | 21.93 |
| 10/11/2013 | 18:47:19 | 19.45 |
| 10/11/2013 | 18:48:19 | 19.52 |
| 10/11/2013 | 18:49:18 | 18.88 |
| 10/11/2013 | 18:50:18 | 20.12 |
| 10/11/2013 | 18:51:18 | 20.89 |
| 10/11/2013 | 18:52:18 | 21.09 |
| 10/11/2013 | 18:53:19 | 21.01 |
| 10/11/2013 | 18:54:19 | 19.4  |
| 10/11/2013 | 18:55:17 | 19.85 |

|                 |          |       |
|-----------------|----------|-------|
| 10/11/2013      | 18:56:18 | 24.65 |
| 10/11/2013      | 18:57:18 | 24.98 |
| 10/11/2013      | 18:58:18 | 22.99 |
| 10/11/2013      | 18:59:18 | 23.31 |
| 10/11/2013      | 19:00:19 | 25.22 |
| 10/11/2013      | 19:01:19 | 25.84 |
| 10/11/2013      | 19:02:19 | 27.93 |
| 10/11/2013      | 19:03:17 | 30.86 |
| 10/11/2013      | 19:04:18 | 37.73 |
| 10/11/2013      | 19:05:18 | 41.49 |
| 10/11/2013      | 19:06:18 | 33.42 |
| 10/11/2013      | 19:07:19 | 28.12 |
| 10/11/2013      | 19:08:19 | 24.42 |
| 10/11/2013      | 19:09:19 | 28.47 |
| 10/11/2013      | 19:10:17 | 32.11 |
| 10/11/2013      | 19:11:18 | 35.91 |
| 10/11/2013      | 19:12:18 | 31.9  |
| Average         | 1881 sam | 25.19 |
| Test Run 10 End |          |       |

Test Run 11 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Wiggins

THC

ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/11/2013 | 19:35:45 | 16.3  |
| 10/11/2013 | 19:36:45 | 16.9  |
| 10/11/2013 | 19:37:45 | 19.2  |
| 10/11/2013 | 19:38:46 | 19.43 |
| 10/11/2013 | 19:39:46 | 20.92 |
| 10/11/2013 | 19:40:46 | 21.44 |
| 10/11/2013 | 19:41:45 | 23.07 |
| 10/11/2013 | 19:42:45 | 23.32 |
| 10/11/2013 | 19:43:45 | 24.41 |
| 10/11/2013 | 19:44:46 | 25.71 |
| 10/11/2013 | 19:45:46 | 30.06 |
| 10/11/2013 | 19:46:46 | 36.61 |
| 10/11/2013 | 19:47:46 | 35.99 |
| 10/11/2013 | 19:48:46 | 29.55 |
| 10/11/2013 | 19:49:45 | 23.62 |
| 10/11/2013 | 19:50:45 | 23.25 |
| 10/11/2013 | 19:51:45 | 22.61 |
| 10/11/2013 | 19:52:45 | 23.8  |
| 10/11/2013 | 19:53:46 | 21.47 |
| 10/11/2013 | 19:54:46 | 20.75 |
| 10/11/2013 | 19:55:46 | 21.14 |
| 10/11/2013 | 19:56:46 | 22.12 |
| 10/11/2013 | 19:57:45 | 23.08 |
| 10/11/2013 | 19:58:45 | 22.57 |
| 10/11/2013 | 19:59:46 | 25.43 |
| 10/11/2013 | 20:00:46 | 26.18 |
| 10/11/2013 | 20:01:46 | 27.36 |
| 10/11/2013 | 20:02:46 | 26.43 |
| 10/11/2013 | 20:03:45 | 32.28 |
| 10/11/2013 | 20:04:45 | 29.23 |
| 10/11/2013 | 20:05:45 | 34.45 |
| 10/11/2013 | 20:06:45 | 34.13 |
| 10/11/2013 | 20:07:46 | 30.96 |
| 10/11/2013 | 20:08:46 | 30.2  |
| 10/11/2013 | 20:09:46 | 32.75 |
| 10/11/2013 | 20:10:47 | 36.19 |
| 10/11/2013 | 20:11:45 | 38.78 |
| 10/11/2013 | 20:12:45 | 37.58 |
| 10/11/2013 | 20:13:45 | 34.83 |
| 10/11/2013 | 20:14:46 | 30.77 |
| 10/11/2013 | 20:15:46 | 30.88 |
| 10/11/2013 | 20:16:46 | 31.74 |
| 10/11/2013 | 20:17:46 | 34.53 |
| 10/11/2013 | 20:18:45 | 42.51 |
| 10/11/2013 | 20:19:45 | 44.65 |

|                 |            |       |
|-----------------|------------|-------|
| 10/11/2013      | 20:20:45   | 35.45 |
| 10/11/2013      | 20:21:46   | 25.21 |
| 10/11/2013      | 20:22:46   | 23.77 |
| 10/11/2013      | 20:23:46   | 28.87 |
| 10/11/2013      | 20:24:46   | 36.75 |
| 10/11/2013      | 20:25:45   | 45.05 |
| 10/11/2013      | 20:26:45   | 45.64 |
| 10/11/2013      | 20:27:45   | 41.52 |
| 10/11/2013      | 20:28:45   | 35.53 |
| 10/11/2013      | 20:29:46   | 33.91 |
| 10/11/2013      | 20:30:46   | 34.59 |
| 10/11/2013      | 20:31:46   | 29.84 |
| 10/11/2013      | 20:32:46   | 31.48 |
| 10/11/2013      | 20:33:45   | 39.63 |
| 10/11/2013      | 20:34:45   | 36.38 |
| Average         | 1794 sampl | 29.72 |
| Test Run 11 End |            |       |

Test Run 12 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Wiggins

THC

ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/11/2013 | 20:49:06 | 22.17 |
| 10/11/2013 | 20:50:04 | 21.67 |
| 10/11/2013 | 20:51:04 | 23.4  |
| 10/11/2013 | 20:52:05 | 24.29 |
| 10/11/2013 | 20:53:05 | 25.04 |
| 10/11/2013 | 20:54:05 | 26.33 |
| 10/11/2013 | 20:55:05 | 26.92 |
| 10/11/2013 | 20:56:06 | 25.87 |
| 10/11/2013 | 20:57:06 | 25.72 |
| 10/11/2013 | 20:58:04 | 25.14 |
| 10/11/2013 | 20:59:04 | 25.52 |
| 10/11/2013 | 21:00:05 | 25.37 |
| 10/11/2013 | 21:01:05 | 25.64 |
| 10/11/2013 | 21:02:05 | 26.15 |
| 10/11/2013 | 21:03:05 | 26.08 |
| 10/11/2013 | 21:04:06 | 24.52 |
| 10/11/2013 | 21:05:04 | 25.79 |
| 10/11/2013 | 21:06:04 | 26.55 |
| 10/11/2013 | 21:07:04 | 27.79 |
| 10/11/2013 | 21:08:05 | 28.72 |
| 10/11/2013 | 21:09:05 | 27.24 |
| 10/11/2013 | 21:10:05 | 30.06 |
| 10/11/2013 | 21:11:05 | 33.03 |
| 10/11/2013 | 21:12:06 | 28.99 |
| 10/11/2013 | 21:13:04 | 20.95 |
| 10/11/2013 | 21:14:04 | 19.34 |
| 10/11/2013 | 21:15:05 | 19.67 |
| 10/11/2013 | 21:16:05 | 21.55 |
| 10/11/2013 | 21:17:05 | 26.17 |
| 10/11/2013 | 21:18:05 | 34.11 |
| 10/11/2013 | 21:19:06 | 29.02 |
| 10/11/2013 | 21:20:06 | 23.47 |
| 10/11/2013 | 21:21:04 | 18.29 |
| 10/11/2013 | 21:22:04 | 20.47 |
| 10/11/2013 | 21:23:05 | 20.63 |
| 10/11/2013 | 21:24:05 | 18.82 |
| 10/11/2013 | 21:25:05 | 18.74 |
| 10/11/2013 | 21:26:06 | 17.07 |
| 10/11/2013 | 21:27:04 | 17.1  |
| 10/11/2013 | 21:28:04 | 18.57 |
| 10/11/2013 | 21:29:05 | 22.44 |
| 10/11/2013 | 21:30:05 | 23.51 |
| 10/11/2013 | 21:31:05 | 23.1  |
| 10/11/2013 | 21:32:05 | 23.66 |
| 10/11/2013 | 21:33:05 | 26.36 |

|                 |           |       |
|-----------------|-----------|-------|
| 10/11/2013      | 21:34:06  | 29.16 |
| 10/11/2013      | 21:35:04  | 30.42 |
| 10/11/2013      | 21:36:04  | 24.58 |
| 10/11/2013      | 21:37:05  | 22.02 |
| 10/11/2013      | 21:38:05  | 21.27 |
| 10/11/2013      | 21:39:05  | 22.01 |
| 10/11/2013      | 21:40:05  | 21.7  |
| 10/11/2013      | 21:41:06  | 25.89 |
| 10/11/2013      | 21:42:06  | 27.16 |
| 10/11/2013      | 21:43:04  | 26.97 |
| 10/11/2013      | 21:44:04  | 27.62 |
| 10/11/2013      | 21:45:04  | 25.38 |
| 10/11/2013      | 21:46:05  | 22.73 |
| 10/11/2013      | 21:47:05  | 22.71 |
| 10/11/2013      | 21:48:05  | 24.06 |
| Average         | 1802 samp | 24.43 |
| Test Run 12 End |           |       |

Test Run 13 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Wiggins

THC

ppm

Start Averaging

|            |         |       |
|------------|---------|-------|
| 10/12/2013 | 8:58:20 | 33.01 |
| 10/12/2013 | 8:59:20 | 33.09 |
| 10/12/2013 | 9:00:21 | 33.69 |
| 10/12/2013 | 9:01:21 | 33.38 |
| 10/12/2013 | 9:02:19 | 34.58 |
| 10/12/2013 | 9:03:19 | 34.24 |
| 10/12/2013 | 9:04:20 | 32.82 |
| 10/12/2013 | 9:05:20 | 31.76 |
| 10/12/2013 | 9:06:20 | 31.56 |
| 10/12/2013 | 9:07:20 | 32.43 |
| 10/12/2013 | 9:08:21 | 32.07 |
| 10/12/2013 | 9:09:21 | 33.62 |
| 10/12/2013 | 9:10:21 | 35.22 |
| 10/12/2013 | 9:11:19 | 35.73 |
| 10/12/2013 | 9:12:20 | 36.7  |
| 10/12/2013 | 9:13:20 | 38.36 |
| 10/12/2013 | 9:14:20 | 39.65 |
| 10/12/2013 | 9:15:20 | 36.74 |
| 10/12/2013 | 9:16:21 | 34.73 |
| 10/12/2013 | 9:17:21 | 37.06 |
| 10/12/2013 | 9:18:19 | 39.31 |
| 10/12/2013 | 9:19:19 | 40.7  |
| 10/12/2013 | 9:20:20 | 41.32 |
| 10/12/2013 | 9:21:20 | 42.72 |
| 10/12/2013 | 9:22:20 | 44.45 |
| 10/12/2013 | 9:23:21 | 41.77 |
| 10/12/2013 | 9:24:21 | 41.75 |
| 10/12/2013 | 9:25:19 | 40.84 |
| 10/12/2013 | 9:26:19 | 40.01 |
| 10/12/2013 | 9:27:20 | 39.81 |
| 10/12/2013 | 9:28:20 | 38.16 |
| 10/12/2013 | 9:29:20 | 36.14 |
| 10/12/2013 | 9:30:20 | 33.8  |
| 10/12/2013 | 9:31:21 | 42.88 |
| 10/12/2013 | 9:32:21 | 44.68 |
| 10/12/2013 | 9:33:19 | 48.06 |
| 10/12/2013 | 9:34:19 | 48.98 |
| 10/12/2013 | 9:35:20 | 49.89 |
| 10/12/2013 | 9:36:20 | 50.59 |
| 10/12/2013 | 9:37:20 | 48.17 |
| 10/12/2013 | 9:38:20 | 42.62 |
| 10/12/2013 | 9:39:21 | 41.05 |
| 10/12/2013 | 9:40:21 | 40.93 |
| 10/12/2013 | 9:41:19 | 38.08 |
| 10/12/2013 | 9:42:19 | 36.88 |



|                 |            |       |
|-----------------|------------|-------|
| 10/12/2013      | 9:43:20    | 38.28 |
| 10/12/2013      | 9:44:20    | 37.83 |
| 10/12/2013      | 9:45:20    | 38.96 |
| 10/12/2013      | 9:46:20    | 39.74 |
| 10/12/2013      | 9:47:21    | 39.65 |
| 10/12/2013      | 9:48:21    | 38.16 |
| 10/12/2013      | 9:49:19    | 36.49 |
| 10/12/2013      | 9:50:19    | 37.79 |
| 10/12/2013      | 9:51:20    | 38.86 |
| 10/12/2013      | 9:52:20    | 38.2  |
| 10/12/2013      | 9:53:20    | 39.36 |
| 10/12/2013      | 9:54:21    | 42.28 |
| 10/12/2013      | 9:55:21    | 42.37 |
| 10/12/2013      | 9:56:19    | 42.48 |
| 10/12/2013      | 9:57:19    | 42.15 |
| 10/12/2013      | 9:58:20    | 42.58 |
| Average         | 1843 sampl | 39.05 |
| Test Run 13 End |            |       |

Test Run 14 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Wiggins

THC

ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/12/2013 | 10:23:19 | 38.78 |
| 10/12/2013 | 10:24:19 | 38.95 |
| 10/12/2013 | 10:25:20 | 37.38 |
| 10/12/2013 | 10:26:20 | 35.26 |
| 10/12/2013 | 10:27:20 | 33.47 |
| 10/12/2013 | 10:28:21 | 33.54 |
| 10/12/2013 | 10:29:21 | 35.1  |
| 10/12/2013 | 10:30:19 | 36.39 |
| 10/12/2013 | 10:31:19 | 38.16 |
| 10/12/2013 | 10:32:20 | 37.83 |
| 10/12/2013 | 10:33:20 | 38.5  |
| 10/12/2013 | 10:34:20 | 39.8  |
| 10/12/2013 | 10:35:20 | 41.11 |
| 10/12/2013 | 10:36:20 | 43.31 |
| 10/12/2013 | 10:37:21 | 43.12 |
| 10/12/2013 | 10:38:19 | 41.6  |
| 10/12/2013 | 10:39:19 | 40.09 |
| 10/12/2013 | 10:40:20 | 41.76 |
| 10/12/2013 | 10:41:20 | 37.42 |
| 10/12/2013 | 10:42:20 | 35.32 |
| 10/12/2013 | 10:43:20 | 36.85 |
| 10/12/2013 | 10:44:21 | 37.03 |
| 10/12/2013 | 10:45:21 | 37.63 |
| 10/12/2013 | 10:46:19 | 37.23 |
| 10/12/2013 | 10:47:19 | 36.6  |
| 10/12/2013 | 10:48:20 | 36.58 |
| 10/12/2013 | 10:49:20 | 34.3  |
| 10/12/2013 | 10:50:20 | 32.95 |
| 10/12/2013 | 10:51:20 | 35.86 |
| 10/12/2013 | 10:52:21 | 40.36 |
| 10/12/2013 | 10:53:21 | 41.13 |
| 10/12/2013 | 10:54:19 | 40.92 |
| 10/12/2013 | 10:55:19 | 38.94 |
| 10/12/2013 | 10:56:20 | 35.9  |
| 10/12/2013 | 10:57:20 | 34.71 |
| 10/12/2013 | 10:58:20 | 35.12 |
| 10/12/2013 | 10:59:20 | 38.4  |
| 10/12/2013 | 11:00:21 | 38.46 |
| 10/12/2013 | 11:01:19 | 38.96 |
| 10/12/2013 | 11:02:19 | 39.11 |
| 10/12/2013 | 11:03:20 | 39.66 |
| 10/12/2013 | 11:04:20 | 37.43 |
| 10/12/2013 | 11:05:20 | 32.13 |
| 10/12/2013 | 11:06:20 | 25.88 |
| 10/12/2013 | 11:07:21 | 22.76 |

|                 |            |       |
|-----------------|------------|-------|
| 10/12/2013      | 11:08:19   | 20.44 |
| 10/12/2013      | 11:09:19   | 21.39 |
| 10/12/2013      | 11:10:20   | 19.1  |
| 10/12/2013      | 11:11:20   | 20.05 |
| 10/12/2013      | 11:12:20   | 19.67 |
| 10/12/2013      | 11:13:20   | 20.48 |
| 10/12/2013      | 11:14:21   | 23.27 |
| 10/12/2013      | 11:15:21   | 23.34 |
| 10/12/2013      | 11:16:19   | 22.56 |
| 10/12/2013      | 11:17:19   | 20.89 |
| 10/12/2013      | 11:18:20   | 21.23 |
| 10/12/2013      | 11:19:20   | 22.61 |
| 10/12/2013      | 11:20:20   | 24.32 |
| 10/12/2013      | 11:21:20   | 25.83 |
| 10/12/2013      | 11:22:21   | 25.38 |
| Average         | 1802 sampl | 33.29 |
| Test Run 14 End |            |       |

Test Run 15 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Wiggins

THC

ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/12/2013 | 11:41:41 | 42.04 |
| 10/12/2013 | 11:42:42 | 38.71 |
| 10/12/2013 | 11:43:42 | 37.78 |
| 10/12/2013 | 11:44:42 | 33.87 |
| 10/12/2013 | 11:45:42 | 33.86 |
| 10/12/2013 | 11:46:43 | 38.57 |
| 10/12/2013 | 11:47:43 | 38.29 |
| 10/12/2013 | 11:48:41 | 37.43 |
| 10/12/2013 | 11:49:41 | 35.42 |
| 10/12/2013 | 11:50:42 | 35.35 |
| 10/12/2013 | 11:51:42 | 36.29 |
| 10/12/2013 | 11:52:42 | 36.18 |
| 10/12/2013 | 11:53:42 | 39.17 |
| 10/12/2013 | 11:54:43 | 41.21 |
| 10/12/2013 | 11:55:43 | 45.09 |
| 10/12/2013 | 11:56:41 | 44.99 |
| 10/12/2013 | 11:57:42 | 42.66 |
| 10/12/2013 | 11:58:42 | 41.22 |
| 10/12/2013 | 11:59:42 | 40.64 |
| 10/12/2013 | 12:00:42 | 41.76 |
| 10/12/2013 | 12:01:43 | 41.25 |
| 10/12/2013 | 12:02:43 | 40.48 |
| 10/12/2013 | 12:03:41 | 40.5  |
| 10/12/2013 | 12:04:41 | 35.92 |
| 10/12/2013 | 12:05:42 | 39.32 |
| 10/12/2013 | 12:06:42 | 39.55 |
| 10/12/2013 | 12:07:42 | 37.98 |
| 10/12/2013 | 12:08:42 | 37.41 |
| 10/12/2013 | 12:09:43 | 34.56 |
| 10/12/2013 | 12:10:43 | 32.14 |
| 10/12/2013 | 12:11:41 | 30.17 |
| 10/12/2013 | 12:12:42 | 29.4  |
| 10/12/2013 | 12:13:42 | 31.84 |
| 10/12/2013 | 12:14:42 | 31.63 |
| 10/12/2013 | 12:15:42 | 30.68 |
| 10/12/2013 | 12:16:43 | 30.88 |
| 10/12/2013 | 12:17:43 | 31.21 |
| 10/12/2013 | 12:18:41 | 33.29 |
| 10/12/2013 | 12:19:41 | 35.08 |
| 10/12/2013 | 12:20:42 | 36.57 |
| 10/12/2013 | 12:21:42 | 34.06 |
| 10/12/2013 | 12:22:42 | 32.44 |
| 10/12/2013 | 12:23:43 | 31.77 |
| 10/12/2013 | 12:24:43 | 31.01 |
| 10/12/2013 | 12:25:41 | 31.56 |

|                 |            |       |
|-----------------|------------|-------|
| 10/12/2013      | 12:26:41   | 32.83 |
| 10/12/2013      | 12:27:42   | 31.92 |
| 10/12/2013      | 12:28:42   | 33.46 |
| 10/12/2013      | 12:29:42   | 33.76 |
| 10/12/2013      | 12:30:43   | 33.98 |
| 10/12/2013      | 12:31:43   | 33.51 |
| 10/12/2013      | 12:32:41   | 33.07 |
| 10/12/2013      | 12:33:41   | 32.11 |
| 10/12/2013      | 12:34:41   | 34.32 |
| 10/12/2013      | 12:35:42   | 32.87 |
| 10/12/2013      | 12:36:42   | 33.76 |
| 10/12/2013      | 12:37:42   | 35.71 |
| 10/12/2013      | 12:38:42   | 32.83 |
| 10/12/2013      | 12:39:43   | 31.48 |
| 10/12/2013      | 12:40:43   | 32.15 |
| Average         | 1794 sampl | 35.65 |
| Test Run 15 End |            |       |

Test Run 1 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Wiggins

THC

ppm

Start Averaging

|            |          |        |
|------------|----------|--------|
| 10/12/2013 | 15:09:26 | 1001.1 |
| 10/12/2013 | 15:10:26 | 1022.4 |
| 10/12/2013 | 15:11:26 | 1009.4 |
| 10/12/2013 | 15:12:26 | 1027.4 |
| 10/12/2013 | 15:13:27 | 1045.1 |
| 10/12/2013 | 15:14:27 | 1073.3 |
| 10/12/2013 | 15:15:26 | 1039.6 |
| 10/12/2013 | 15:16:26 | 1038.3 |
| 10/12/2013 | 15:17:26 | 1049.6 |
| 10/12/2013 | 15:18:26 | 1074.6 |
| 10/12/2013 | 15:19:27 | 1072.1 |
| 10/12/2013 | 15:20:27 | 1010.8 |
| 10/12/2013 | 15:21:27 | 962.7  |
| 10/12/2013 | 15:22:25 | 922.6  |
| 10/12/2013 | 15:23:26 | 912.5  |
| 10/12/2013 | 15:24:26 | 885.5  |
| 10/12/2013 | 15:25:26 | 971    |
| 10/12/2013 | 15:26:27 | 1016   |
| 10/12/2013 | 15:27:27 | 1059.8 |
| 10/12/2013 | 15:28:27 | 1099.5 |
| 10/12/2013 | 15:29:25 | 1128.8 |
| 10/12/2013 | 15:30:26 | 1126.8 |
| 10/12/2013 | 15:31:26 | 1103.4 |
| 10/12/2013 | 15:32:26 | 1069.6 |
| 10/12/2013 | 15:33:27 | 1011.3 |
| 10/12/2013 | 15:34:27 | 1040.7 |
| 10/12/2013 | 15:35:27 | 1079.2 |
| 10/12/2013 | 15:36:25 | 1094   |
| 10/12/2013 | 15:37:26 | 1082.4 |
| 10/12/2013 | 15:38:26 | 1112.7 |
| 10/12/2013 | 15:39:26 | 1120.2 |
| 10/12/2013 | 15:40:26 | 1154.1 |
| 10/12/2013 | 15:41:27 | 1168.4 |
| 10/12/2013 | 15:42:27 | 1163.2 |
| 10/12/2013 | 15:43:27 | 1133.2 |
| 10/12/2013 | 15:44:26 | 1049.9 |
| 10/12/2013 | 15:45:26 | 1053.5 |
| 10/12/2013 | 15:46:26 | 1027   |
| 10/12/2013 | 15:47:26 | 1020.1 |
| 10/12/2013 | 15:48:27 | 1022.4 |
| 10/12/2013 | 15:49:27 | 1050   |
| 10/12/2013 | 15:50:27 | 1065.4 |
| 10/12/2013 | 15:51:25 | 1040.1 |
| 10/12/2013 | 15:52:26 | 1079.5 |
| 10/12/2013 | 15:53:26 | 1113.1 |

|                |            |        |
|----------------|------------|--------|
| 10/12/2013     | 15:54:26   | 1144   |
| 10/12/2013     | 15:55:26   | 1128.2 |
| 10/12/2013     | 15:56:27   | 1054   |
| 10/12/2013     | 15:57:27   | 993.8  |
| 10/12/2013     | 15:58:27   | 1039.7 |
| 10/12/2013     | 15:59:25   | 1073   |
| 10/12/2013     | 16:00:26   | 1061.5 |
| 10/12/2013     | 16:01:26   | 1101.2 |
| 10/12/2013     | 16:02:26   | 1085.7 |
| 10/12/2013     | 16:03:26   | 1125.9 |
| 10/12/2013     | 16:04:27   | 1169.1 |
| 10/12/2013     | 16:05:27   | 1190.6 |
| 10/12/2013     | 16:06:27   | 1218.4 |
| 10/12/2013     | 16:07:26   | 1252.7 |
| 10/12/2013     | 16:08:26   | 1293.9 |
| Average        | 1811 sampl | 1074.7 |
| Test Run 1 End |            |        |

Test Run 2 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Wiggins

THC

ppm

Start Averaging

|            |          |        |
|------------|----------|--------|
| 10/12/2013 | 16:36:23 | 989.3  |
| 10/12/2013 | 16:37:21 | 1058.5 |
| 10/12/2013 | 16:38:22 | 1059.2 |
| 10/12/2013 | 16:39:22 | 1090.3 |
| 10/12/2013 | 16:40:22 | 1113.4 |
| 10/12/2013 | 16:41:23 | 1157.2 |
| 10/12/2013 | 16:42:23 | 1148.6 |
| 10/12/2013 | 16:43:23 | 1105.5 |
| 10/12/2013 | 16:44:21 | 1046.7 |
| 10/12/2013 | 16:45:22 | 1012.7 |
| 10/12/2013 | 16:46:22 | 968.8  |
| 10/12/2013 | 16:47:22 | 963.1  |
| 10/12/2013 | 16:48:22 | 949.2  |
| 10/12/2013 | 16:49:23 | 960.6  |
| 10/12/2013 | 16:50:23 | 959    |
| 10/12/2013 | 16:51:21 | 942.5  |
| 10/12/2013 | 16:52:22 | 962.3  |
| 10/12/2013 | 16:53:22 | 925.5  |
| 10/12/2013 | 16:54:22 | 960.7  |
| 10/12/2013 | 16:55:23 | 971.3  |
| 10/12/2013 | 16:56:23 | 990.3  |
| 10/12/2013 | 16:57:23 | 949.2  |
| 10/12/2013 | 16:58:21 | 891.5  |
| 10/12/2013 | 16:59:22 | 905.3  |
| 10/12/2013 | 17:00:22 | 914.1  |
| 10/12/2013 | 17:01:22 | 914.2  |
| 10/12/2013 | 17:02:23 | 926.1  |
| 10/12/2013 | 17:03:23 | 930.9  |
| 10/12/2013 | 17:04:23 | 895.7  |
| 10/12/2013 | 17:05:21 | 943.1  |
| 10/12/2013 | 17:06:22 | 943.9  |
| 10/12/2013 | 17:07:22 | 978.3  |
| 10/12/2013 | 17:08:22 | 940.6  |
| 10/12/2013 | 17:09:23 | 993.2  |
| 10/12/2013 | 17:10:23 | 996.5  |
| 10/12/2013 | 17:11:23 | 986.9  |
| 10/12/2013 | 17:12:21 | 952    |
| 10/12/2013 | 17:13:22 | 875.5  |
| 10/12/2013 | 17:14:22 | 916.5  |
| 10/12/2013 | 17:15:22 | 939.4  |
| 10/12/2013 | 17:16:23 | 930.8  |
| 10/12/2013 | 17:17:23 | 919.8  |
| 10/12/2013 | 17:18:23 | 938.6  |
| 10/12/2013 | 17:19:21 | 999.3  |
| 10/12/2013 | 17:20:22 | 986.2  |



|                |            |       |
|----------------|------------|-------|
| 10/12/2013     | 17:21:22   | 963   |
| 10/12/2013     | 17:22:22   | 910.9 |
| 10/12/2013     | 17:23:23   | 886.5 |
| 10/12/2013     | 17:24:23   | 873.2 |
| 10/12/2013     | 17:25:21   | 870.2 |
| 10/12/2013     | 17:26:21   | 876.3 |
| 10/12/2013     | 17:27:22   | 925.8 |
| 10/12/2013     | 17:28:22   | 911.6 |
| 10/12/2013     | 17:29:22   | 865.7 |
| 10/12/2013     | 17:30:22   | 850   |
| 10/12/2013     | 17:31:23   | 893.9 |
| 10/12/2013     | 17:32:23   | 913.1 |
| 10/12/2013     | 17:33:21   | 915.1 |
| 10/12/2013     | 17:34:21   | 918.1 |
| 10/12/2013     | 17:35:22   | 960.6 |
| 10/12/2013     | 17:36:22   | 942.2 |
| Average        | 1824 sampl | 957   |
| Test Run 2 End |            |       |

Test Run 3 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Wiggins

THC

ppm

Start Averaging

|            |          |        |
|------------|----------|--------|
| 10/12/2013 | 18:00:49 | 1126.2 |
| 10/12/2013 | 18:01:49 | 1091.3 |
| 10/12/2013 | 18:02:49 | 1034.6 |
| 10/12/2013 | 18:03:49 | 996.3  |
| 10/12/2013 | 18:04:50 | 1063.4 |
| 10/12/2013 | 18:05:50 | 1027.2 |
| 10/12/2013 | 18:06:50 | 995.6  |
| 10/12/2013 | 18:07:48 | 1085.5 |
| 10/12/2013 | 18:08:49 | 1133.7 |
| 10/12/2013 | 18:09:49 | 1177.7 |
| 10/12/2013 | 18:10:49 | 1174.3 |
| 10/12/2013 | 18:11:50 | 1169.6 |
| 10/12/2013 | 18:12:50 | 1112.9 |
| 10/12/2013 | 18:13:50 | 1135.7 |
| 10/12/2013 | 18:14:50 | 1102.2 |
| 10/12/2013 | 18:15:49 | 1176.6 |
| 10/12/2013 | 18:16:49 | 1201.9 |
| 10/12/2013 | 18:17:49 | 1217   |
| 10/12/2013 | 18:18:49 | 1248   |
| 10/12/2013 | 18:19:50 | 1297.6 |
| 10/12/2013 | 18:20:50 | 1351.7 |
| 10/12/2013 | 18:21:50 | 1412.8 |
| 10/12/2013 | 18:22:49 | 1417.9 |
| 10/12/2013 | 18:23:49 | 1368.5 |
| 10/12/2013 | 18:24:49 | 1287.4 |
| 10/12/2013 | 18:25:49 | 1173.7 |
| 10/12/2013 | 18:26:50 | 1198.4 |
| 10/12/2013 | 18:27:50 | 1205.2 |
| 10/12/2013 | 18:28:50 | 1198.8 |
| 10/12/2013 | 18:29:50 | 1194.9 |
| 10/12/2013 | 18:30:49 | 1174.8 |
| 10/12/2013 | 18:31:49 | 1184.2 |
| 10/12/2013 | 18:32:49 | 1161.6 |
| 10/12/2013 | 18:33:50 | 1200.8 |
| 10/12/2013 | 18:34:50 | 1239.5 |
| 10/12/2013 | 18:35:50 | 1260.8 |
| 10/12/2013 | 18:36:50 | 1242.4 |
| 10/12/2013 | 18:37:49 | 1230.9 |
| 10/12/2013 | 18:38:49 | 1200.6 |
| 10/12/2013 | 18:39:49 | 1159   |
| 10/12/2013 | 18:40:49 | 1156.6 |
| 10/12/2013 | 18:41:50 | 1183.6 |
| 10/12/2013 | 18:42:50 | 1112.7 |
| 10/12/2013 | 18:43:50 | 1146.3 |
| 10/12/2013 | 18:44:48 | 1178.5 |

|                |            |        |
|----------------|------------|--------|
| 10/12/2013     | 18:45:49   | 1184.8 |
| 10/12/2013     | 18:46:49   | 1190.2 |
| 10/12/2013     | 18:47:49   | 1236.3 |
| 10/12/2013     | 18:48:50   | 1229.3 |
| 10/12/2013     | 18:49:50   | 1299.9 |
| 10/12/2013     | 18:50:50   | 1314.9 |
| 10/12/2013     | 18:51:48   | 1303.2 |
| 10/12/2013     | 18:52:49   | 1305.8 |
| 10/12/2013     | 18:53:49   | 1308.6 |
| 10/12/2013     | 18:54:49   | 1314   |
| 10/12/2013     | 18:55:50   | 1277   |
| 10/12/2013     | 18:56:50   | 1203.3 |
| 10/12/2013     | 18:57:50   | 1144.9 |
| 10/12/2013     | 18:58:48   | 1242.6 |
| 10/12/2013     | 18:59:49   | 1242.4 |
| Average        | 1796 sampl | 1200   |
| Test Run 3 End |            |        |

Test Run 9 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Wiggins

THC

ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/13/2013 | 9:22:03  | 71.7  |
| 10/13/2013 | 9:23:03  | 73.9  |
| 10/13/2013 | 9:24:04  | 76.1  |
| 10/13/2013 | 9:25:04  | 78.7  |
| 10/13/2013 | 9:26:04  | 80.4  |
| 10/13/2013 | 9:27:04  | 82.1  |
| 10/13/2013 | 9:28:05  | 83.8  |
| 10/13/2013 | 9:29:03  | 85.1  |
| 10/13/2013 | 9:30:03  | 85.8  |
| 10/13/2013 | 9:31:03  | 86.3  |
| 10/13/2013 | 9:32:04  | 86.9  |
| 10/13/2013 | 9:33:04  | 87.8  |
| 10/13/2013 | 9:34:04  | 88    |
| 10/13/2013 | 9:35:05  | 89.5  |
| 10/13/2013 | 9:36:03  | 87.7  |
| 10/13/2013 | 9:37:03  | 87    |
| 10/13/2013 | 9:38:03  | 86.1  |
| 10/13/2013 | 9:39:04  | 85.2  |
| 10/13/2013 | 9:40:04  | 84.8  |
| 10/13/2013 | 9:41:04  | 85.1  |
| 10/13/2013 | 9:42:04  | 85.9  |
| 10/13/2013 | 9:43:05  | 87.4  |
| 10/13/2013 | 9:44:03  | 88.9  |
| 10/13/2013 | 9:45:03  | 89.8  |
| 10/13/2013 | 9:46:03  | 90.7  |
| 10/13/2013 | 9:47:04  | 90.6  |
| 10/13/2013 | 9:48:04  | 90.8  |
| 10/13/2013 | 9:49:04  | 92.2  |
| 10/13/2013 | 9:50:05  | 93.7  |
| 10/13/2013 | 9:51:03  | 93.8  |
| 10/13/2013 | 9:52:03  | 94.6  |
| 10/13/2013 | 9:53:03  | 95.6  |
| 10/13/2013 | 9:54:04  | 96    |
| 10/13/2013 | 9:55:04  | 96.3  |
| 10/13/2013 | 9:56:04  | 97    |
| 10/13/2013 | 9:57:04  | 97.5  |
| 10/13/2013 | 9:58:05  | 98    |
| 10/13/2013 | 9:59:03  | 98.3  |
| 10/13/2013 | 10:00:03 | 99.7  |
| 10/13/2013 | 10:01:03 | 100.8 |
| 10/13/2013 | 10:02:04 | 101.7 |
| 10/13/2013 | 10:03:04 | 102.4 |
| 10/13/2013 | 10:04:04 | 103   |
| 10/13/2013 | 10:05:05 | 102.3 |
| 10/13/2013 | 10:06:03 | 101.1 |

|                |            |      |
|----------------|------------|------|
| 10/13/2013     | 10:07:03   | 100  |
| 10/13/2013     | 10:08:03   | 98.6 |
| 10/13/2013     | 10:09:04   | 98.2 |
| 10/13/2013     | 10:10:04   | 98.4 |
| 10/13/2013     | 10:11:04   | 98.1 |
| 10/13/2013     | 10:12:04   | 97.6 |
| 10/13/2013     | 10:13:05   | 96.8 |
| 10/13/2013     | 10:14:03   | 95.4 |
| 10/13/2013     | 10:15:03   | 92.2 |
| 10/13/2013     | 10:16:03   | 91.5 |
| 10/13/2013     | 10:17:04   | 93.1 |
| 10/13/2013     | 10:18:04   | 94.6 |
| 10/13/2013     | 10:19:04   | 97.1 |
| 10/13/2013     | 10:20:04   | 97.7 |
| 10/13/2013     | 10:21:05   | 97.5 |
| Average        | 1797 sampl | 91.8 |
| Test Run 9 End |            |      |

Test Run 10 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Wiggins

THC

ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/13/2013 | 11:04:49 | 77.08 |
| 10/13/2013 | 11:05:50 | 78.11 |
| 10/13/2013 | 11:06:50 | 78.19 |
| 10/13/2013 | 11:07:50 | 77.63 |
| 10/13/2013 | 11:08:50 | 77.56 |
| 10/13/2013 | 11:09:51 | 77.71 |
| 10/13/2013 | 11:10:51 | 77.97 |
| 10/13/2013 | 11:11:49 | 77.89 |
| 10/13/2013 | 11:12:49 | 78.97 |
| 10/13/2013 | 11:13:50 | 79.14 |
| 10/13/2013 | 11:14:50 | 77.97 |
| 10/13/2013 | 11:15:51 | 76.86 |
| 10/13/2013 | 11:16:49 | 76.19 |
| 10/13/2013 | 11:17:49 | 76.58 |
| 10/13/2013 | 11:18:50 | 76.82 |
| 10/13/2013 | 11:19:50 | 77.53 |
| 10/13/2013 | 11:20:50 | 78.27 |
| 10/13/2013 | 11:21:50 | 79.01 |
| 10/13/2013 | 11:22:51 | 79.04 |
| 10/13/2013 | 11:23:51 | 78.95 |
| 10/13/2013 | 11:24:49 | 78.85 |
| 10/13/2013 | 11:25:50 | 78.45 |
| 10/13/2013 | 11:26:50 | 78.1  |
| 10/13/2013 | 11:27:50 | 78.55 |
| 10/13/2013 | 11:28:50 | 78.58 |
| 10/13/2013 | 11:29:51 | 78.39 |
| 10/13/2013 | 11:30:51 | 78.37 |
| 10/13/2013 | 11:31:49 | 79.42 |
| 10/13/2013 | 11:32:49 | 81.98 |
| 10/13/2013 | 11:33:50 | 84.04 |
| 10/13/2013 | 11:34:50 | 83.84 |
| 10/13/2013 | 11:35:50 | 83.55 |
| 10/13/2013 | 11:36:50 | 83.19 |
| 10/13/2013 | 11:37:51 | 82.62 |
| 10/13/2013 | 11:38:51 | 82.45 |
| 10/13/2013 | 11:39:49 | 82.09 |
| 10/13/2013 | 11:40:49 | 81.91 |
| 10/13/2013 | 11:41:50 | 81.54 |
| 10/13/2013 | 11:42:50 | 81.56 |
| 10/13/2013 | 11:43:50 | 82.21 |
| 10/13/2013 | 11:44:51 | 82.55 |
| 10/13/2013 | 11:45:51 | 82.6  |
| 10/13/2013 | 11:46:49 | 82.99 |
| 10/13/2013 | 11:47:49 | 83.33 |
| 10/13/2013 | 11:48:50 | 83.22 |

|                 |            |       |
|-----------------|------------|-------|
| 10/13/2013      | 11:49:50   | 83.17 |
| 10/13/2013      | 11:50:50   | 84.26 |
| 10/13/2013      | 11:51:50   | 86.33 |
| 10/13/2013      | 11:52:51   | 87.37 |
| 10/13/2013      | 11:53:51   | 85.99 |
| 10/13/2013      | 11:54:49   | 85.29 |
| 10/13/2013      | 11:55:49   | 85.22 |
| 10/13/2013      | 11:56:50   | 86.39 |
| 10/13/2013      | 11:57:50   | 86.43 |
| 10/13/2013      | 11:58:50   | 85.81 |
| 10/13/2013      | 11:59:50   | 86.1  |
| 10/13/2013      | 12:00:51   | 86.23 |
| 10/13/2013      | 12:01:51   | 84.93 |
| 10/13/2013      | 12:02:49   | 82.97 |
| 10/13/2013      | 12:03:50   | 82.23 |
| 10/13/2013      | 12:04:50   | 84.21 |
| Average         | 1825 sampl | 81.24 |
| Test Run 10 End |            |       |

Test Run 11 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Wiggins

THC

ppm

Start Averaging

|            |          |        |
|------------|----------|--------|
| 10/13/2013 | 12:31:14 | 107.99 |
| 10/13/2013 | 12:32:14 | 108.6  |
| 10/13/2013 | 12:33:15 | 109.57 |
| 10/13/2013 | 12:34:15 | 112.47 |
| 10/13/2013 | 12:35:15 | 115.91 |

Pause

|            |          |        |
|------------|----------|--------|
| 10/13/2013 | 12:36:15 | 115.09 |
| 10/13/2013 | 12:37:14 | 112.39 |
| 10/13/2013 | 12:38:14 | 111.26 |
| 10/13/2013 | 12:39:14 | 112.42 |
| 10/13/2013 | 12:40:14 | 113.56 |
| 10/13/2013 | 12:41:15 | 114.42 |
| 10/13/2013 | 12:42:15 | 113.98 |
| 10/13/2013 | 12:43:15 | 112.12 |
| 10/13/2013 | 12:44:15 | 110.5  |
| 10/13/2013 | 12:45:14 | 109.3  |
| 10/13/2013 | 12:46:14 | 108.63 |
| 10/13/2013 | 12:47:14 | 110.13 |
| 10/13/2013 | 12:48:14 | 112.11 |
| 10/13/2013 | 12:49:15 | 112.2  |
| 10/13/2013 | 12:50:15 | 111.62 |
| 10/13/2013 | 12:51:15 | 111.91 |

End Pause

|            |          |        |
|------------|----------|--------|
| 10/13/2013 | 12:52:15 | 111.76 |
| 10/13/2013 | 12:53:14 | 110.85 |
| 10/13/2013 | 12:54:14 | 109.25 |
| 10/13/2013 | 12:55:14 | 107.32 |
| 10/13/2013 | 12:56:15 | 105.6  |
| 10/13/2013 | 12:57:15 | 105.51 |
| 10/13/2013 | 12:58:15 | 105.13 |
| 10/13/2013 | 12:59:15 | 103.83 |
| 10/13/2013 | 13:00:15 | 101.32 |
| 10/13/2013 | 13:01:14 | 100.13 |
| 10/13/2013 | 13:02:14 | 99.2   |
| 10/13/2013 | 13:03:14 | 99     |
| 10/13/2013 | 13:04:14 | 99.6   |
| 10/13/2013 | 13:05:15 | 100.72 |
| 10/13/2013 | 13:06:15 | 100.21 |
| 10/13/2013 | 13:07:15 | 99.39  |
| 10/13/2013 | 13:08:15 | 99     |
| 10/13/2013 | 13:09:14 | 98.91  |
| 10/13/2013 | 13:10:14 | 98.55  |
| 10/13/2013 | 13:11:14 | 99.06  |
| 10/13/2013 | 13:12:15 | 99.18  |
| 10/13/2013 | 13:13:15 | 99.24  |



|                 |            |        |
|-----------------|------------|--------|
| 10/13/2013      | 13:14:15   | 100.67 |
| 10/13/2013      | 13:15:15   | 101.29 |
| 10/13/2013      | 13:16:14   | 100.86 |
| 10/13/2013      | 13:17:14   | 100.04 |
| 10/13/2013      | 13:18:14   | 99.03  |
| 10/13/2013      | 13:19:14   | 99.26  |
| 10/13/2013      | 13:20:15   | 100.68 |
| 10/13/2013      | 13:21:15   | 100.36 |
| 10/13/2013      | 13:22:15   | 99.65  |
| 10/13/2013      | 13:23:15   | 98.28  |
| 10/13/2013      | 13:24:14   | 96.42  |
| 10/13/2013      | 13:25:14   | 96.23  |
| 10/13/2013      | 13:26:14   | 96.14  |
| 10/13/2013      | 13:27:14   | 94.87  |
| 10/13/2013      | 13:28:15   | 95.34  |
| 10/13/2013      | 13:29:15   | 94.94  |
| 10/13/2013      | 13:30:15   | 94.01  |
| 10/13/2013      | 13:31:14   | 92.64  |
| 10/13/2013      | 13:32:14   | 91.56  |
| 10/13/2013      | 13:33:14   | 89.78  |
| 10/13/2013      | 13:34:14   | 87.93  |
| 10/13/2013      | 13:35:15   | 86.12  |
| 10/13/2013      | 13:36:15   | 85.57  |
| 10/13/2013      | 13:37:15   | 85.8   |
| 10/13/2013      | 13:38:14   | 85.88  |
| 10/13/2013      | 13:39:14   | 85.76  |
| 10/13/2013      | 13:40:14   | 85.56  |
| 10/13/2013      | 13:41:14   | 85.49  |
| 10/13/2013      | 13:42:15   | 84.8   |
| 10/13/2013      | 13:43:15   | 84.44  |
| 10/13/2013      | 13:44:15   | 83.05  |
| 10/13/2013      | 13:45:15   | 81.96  |
| 10/13/2013      | 13:46:14   | 81     |
| 10/13/2013      | 13:47:14   | 81.22  |
| Average         | 1833 sampl | 97.19  |
| Test Run 11 End |            |        |

Enviva - Wiggins  
Run 1

Date: 10-Oct  
Run Time: 0917-1017  
(CEM Run Time Eastern)

| Parameter | Symbol | Green Hammermill                        |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

| Analyzer Calibration Error - Calibration Standards |                      |       |
|----------------------------------------------------|----------------------|-------|
| Zero Gas                                           | $C_{v, \text{zero}}$ | 0.0   |
| Low-Level Gas                                      | $C_{v, \text{low}}$  | 27.99 |
| Mid-Level Gas                                      | $C_{v, \text{mid}}$  | 50    |
| High-Level Gas                                     | $C_{v, \text{high}}$ | 86.13 |
| Calibration Span                                   | CS                   | 100   |

| Analyzer Calibration Error - Instrument Response |                        |      |
|--------------------------------------------------|------------------------|------|
| Zero Gas                                         | $C_{Dir, \text{zero}}$ | 0.0  |
| Low-Level Gas                                    | $C_{Dir, \text{low}}$  | 28.3 |
| Mid-Level Gas                                    | $C_{Dir, \text{mid}}$  | 50.8 |
| High-Level Gas                                   | $C_{Dir, \text{high}}$ | 86.5 |

0900

| Analyzer Calibration Error - Results (Percent of Span) |                     |     |
|--------------------------------------------------------|---------------------|-----|
| Zero Gas                                               | $ACE_{\text{zero}}$ | 0.0 |
| Low-Level Gas                                          | $ACE_{\text{low}}$  | 1.1 |
| Mid-Level Gas                                          | $ACE_{\text{mid}}$  | 1.6 |
| High-Level Gas                                         | $ACE_{\text{high}}$ | 0.4 |
| Specification                                          | $ACE_{\text{spec}}$ | ±5  |

| System Calibrations - Instrument Response |                             |       |
|-------------------------------------------|-----------------------------|-------|
| Initial Zero                              | $C_{s, \text{zero (pre)}}$  | 0     |
| Final Zero                                | $C_{s, \text{zero (post)}}$ | 0.11  |
| Upscale Gas Standard                      | $C_{MA}$                    | 50.0  |
| Initial Upscale                           | $C_{v, \text{up (pre)}}$    | 50.8  |
| Final Upscale                             | $C_{v, \text{up (post)}}$   | 50.65 |

| System Bias - Results (Percent) |                               |      |
|---------------------------------|-------------------------------|------|
| Zero (pre)                      | $SB_{i \text{ (zero)}}$       | 0.0  |
| Zero (post)                     | $SB_{\text{final (zero)}}$    | 0.1  |
| Upscale (pre)                   | $SB_{i \text{ (upscale)}}$    | 0.0  |
| Upscale (post)                  | $SB_{\text{final (upscale)}}$ | -0.1 |
| Specification                   | $SB_{\text{spec}}$            | NA   |

| System Drift - Results (Percent) |                      |      |
|----------------------------------|----------------------|------|
| Zero                             | $D_{\text{zero}}$    | 0.1  |
| Upscale                          | $D_{\text{upscale}}$ | -0.1 |
| Specification                    | $D_{\text{spec}}$    | ±3   |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 28 |

| Calibration Correction |                  |      |
|------------------------|------------------|------|
| Raw Average            | $C_{\text{ave}}$ | 30.8 |
| Bias Average - Zero    | $C_0$            | N/A  |
| Bias Average - Upscale | $C_M$            | N/A  |
| Corrected Run Average  | $C_{\text{Gas}}$ | 30.8 |

Enviva - Wiggins  
Run 2

Date: 10-Oct  
Run Time: 1036-1136

| Parameter | Symbol | Green Hammermill                        |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

| Analyzer Calibration Error - Instrument Response |                 |      |
|--------------------------------------------------|-----------------|------|
| Zero Gas                                         | $C_{Dir, zero}$ | 0.0  |
| Low-Level Gas                                    | $C_{Dir, low}$  | 28.3 |
| Mid-Level Gas                                    | $C_{Dir, mid}$  | 50.8 |
| High-Level Gas                                   | $C_{Dir, high}$ | 86.5 |

| Analyzer Calibration Error - Results (Percent of Span) |              |     |
|--------------------------------------------------------|--------------|-----|
| Zero Gas                                               | $ACE_{zero}$ | 0.0 |
| Low-Level Gas                                          | $ACE_{low}$  | 1.1 |
| Mid-Level Gas                                          | $ACE_{mid}$  | 1.6 |
| High-Level Gas                                         | $ACE_{high}$ | 0.4 |
| Specification                                          | $ACE_{spec}$ | ±5  |

| System Calibrations - Instrument Response |                      |       |
|-------------------------------------------|----------------------|-------|
| Initial Zero                              | $C_{s, zero (pre)}$  | 0.11  |
| Final Zero                                | $C_{s, zero (post)}$ | 0.05  |
| Upscale Gas Standard                      | $C_{MA}$             | 50.0  |
| Initial Upscale                           | $C_{v, up (pre)}$    | 50.65 |
| Final Upscale                             | $C_{v, up (post)}$   | 50.1  |

| System Bias - Results (Percent) |                        |      |
|---------------------------------|------------------------|------|
| Zero (pre)                      | $SB_{i (zero)}$        | 0.1  |
| Zero (post)                     | $SB_{final (zero)}$    | 0.1  |
| Upscale (pre)                   | $SB_{i (upscale)}$     | -0.1 |
| Upscale (post)                  | $SB_{final (upscale)}$ | -0.7 |
| Specification                   | $SB_{spec}$            | NA   |

| System Drift - Results (Percent) |               |      |
|----------------------------------|---------------|------|
| Zero                             | $D_{zero}$    | -0.1 |
| Upscale                          | $D_{upscale}$ | -0.5 |
| Specification                    | $D_{spec}$    | ±3   |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 28 |

| Calibration Correction |           |             |
|------------------------|-----------|-------------|
| Raw Average            | $C_{ave}$ | 32.23       |
| Bias Average - Zero    | $C_0$     | N/A         |
| Bias Average - Upscale | $C_M$     | N/A         |
| Corrected Run Average  | $C_{Gas}$ | <b>32.2</b> |

Enviva - Wiggins  
Run 3

Date: 10-Oct  
Run Time: 1150-1250

| Parameter | Symbol | Green Hammermill                        |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

| Analyzer Calibration Error - Instrument Response |                 |      |
|--------------------------------------------------|-----------------|------|
| Zero Gas                                         | $C_{Dir, zero}$ | 0.0  |
| Low-Level Gas                                    | $C_{Dir, low}$  | 28.3 |
| Mid-Level Gas                                    | $C_{Dir, mid}$  | 50.8 |
| High-Level Gas                                   | $C_{Dir, high}$ | 86.5 |

| Analyzer Calibration Error - Results (Percent of Span) |              |     |
|--------------------------------------------------------|--------------|-----|
| Zero Gas                                               | $ACE_{zero}$ | 0.0 |
| Low-Level Gas                                          | $ACE_{low}$  | 1.1 |
| Mid-Level Gas                                          | $ACE_{mid}$  | 1.6 |
| High-Level Gas                                         | $ACE_{high}$ | 0.4 |
| Specification                                          | $ACE_{spec}$ | ±5  |

| System Calibrations - Instrument Response |                      |      |
|-------------------------------------------|----------------------|------|
| Initial Zero                              | $C_{s, zero (pre)}$  | 0.05 |
| Final Zero                                | $C_{s, zero (post)}$ | 0.1  |
| Upscale Gas Standard                      | $C_{MA}$             | 50.0 |
| Initial Upscale                           | $C_{v, up (pre)}$    | 50.1 |
| Final Upscale                             | $C_{v, up (post)}$   | 49.8 |

| System Bias - Results (Percent) |                        |      |
|---------------------------------|------------------------|------|
| Zero (pre)                      | $SB_{i (zero)}$        | 0.1  |
| Zero (post)                     | $SB_{final (zero)}$    | 0.1  |
| Upscale (pre)                   | $SB_{i (upscale)}$     | -0.7 |
| Upscale (post)                  | $SB_{final (upscale)}$ | -1.0 |
| Specification                   | $SB_{spec}$            | NA   |

| System Drift - Results (Percent) |               |      |
|----------------------------------|---------------|------|
| Zero                             | $D_{zero}$    | 0.1  |
| Upscale                          | $D_{upscale}$ | -0.3 |
| Specification                    | $D_{spec}$    | ±3   |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 28 |

| Calibration Correction |           |             |
|------------------------|-----------|-------------|
| Raw Average            | $C_{ave}$ | 26.38       |
| Bias Average - Zero    | $C_0$     | N/A         |
| Bias Average - Upscale | $C_M$     | N/A         |
| Corrected Run Average  | $C_{Gas}$ | <b>26.4</b> |

Enviva - Wiggins  
Run #7

Date: 11-Oct  
Run Time: 1343-1443

| Parameter | Symbol | Pellet Cooler 2                     |
|-----------|--------|-------------------------------------|
|           |        | THC                                 |
|           |        | (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                    |

| Analyzer Calibration Error - Calibration Standards |                      |       |
|----------------------------------------------------|----------------------|-------|
| Zero Gas                                           | $C_{v, \text{zero}}$ | 0.0   |
| Low-Level Gas                                      | $C_{v, \text{low}}$  | 27.99 |
| Mid-Level Gas                                      | $C_{v, \text{mid}}$  | 50    |
| High-Level Gas                                     | $C_{v, \text{high}}$ | 86.13 |
| Calibration Span                                   | CS                   | 100   |

| Analyzer Calibration Error - Instrument Response |                        |       |
|--------------------------------------------------|------------------------|-------|
| Zero Gas                                         | $C_{Dir, \text{zero}}$ | 0.0   |
| Low-Level Gas                                    | $C_{Dir, \text{low}}$  | 28.1  |
| Mid-Level Gas                                    | $C_{Dir, \text{mid}}$  | 51.1  |
| High-Level Gas                                   | $C_{Dir, \text{high}}$ | 86.15 |

| Analyzer Calibration Error - Results (Percent of Span) |                     |     |
|--------------------------------------------------------|---------------------|-----|
| Zero Gas                                               | $ACE_{\text{zero}}$ | 0.0 |
| Low-Level Gas                                          | $ACE_{\text{low}}$  | 0.4 |
| Mid-Level Gas                                          | $ACE_{\text{mid}}$  | 2.2 |
| High-Level Gas                                         | $ACE_{\text{high}}$ | 0.0 |
| Specification                                          | $ACE_{\text{spec}}$ | ±5  |

| System Calibrations - Instrument Response |                             |       |
|-------------------------------------------|-----------------------------|-------|
| Initial Zero                              | $C_{s, \text{zero (pre)}}$  | 0.04  |
| Final Zero                                | $C_{s, \text{zero (post)}}$ | 0.35  |
| Upscale Gas Standard                      | $C_{MA}$                    | 50.0  |
| Initial Upscale                           | $C_{v, \text{up (pre)}}$    | 50.14 |
| Final Upscale                             | $C_{v, \text{up (post)}}$   | 50.2  |

| System Bias - Results (Percent) |                               |      |
|---------------------------------|-------------------------------|------|
| Zero (pre)                      | $SB_i (\text{zero})$          | 0.0  |
| Zero (post)                     | $SB_{\text{final (zero)}}$    | 0.3  |
| Upscale (pre)                   | $SB_i (\text{upscale})$       | -1.0 |
| Upscale (post)                  | $SB_{\text{final (upscale)}}$ | -0.9 |
| Specification                   | $SB_{\text{spec}}$            | NA   |

| System Drift - Results (Percent) |                      |     |
|----------------------------------|----------------------|-----|
| Zero                             | $D_{\text{zero}}$    | 0.3 |
| Upscale                          | $D_{\text{upscale}}$ | 0.1 |
| Specification                    | $D_{\text{spec}}$    | ±3  |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 28 |

| Calibration Correction |                  |       |
|------------------------|------------------|-------|
| Raw Average            | $C_{\text{ave}}$ | 23.80 |
| Bias Average - Zero    | $C_0$            | N/A   |
| Bias Average - Upscale | $C_M$            | N/A   |
| Corrected Run Average  | $C_{\text{Gas}}$ | 23.8  |

Enviva - Wiggins  
Run #8

Date: 11-Oct  
Run Time: 1508-1608

| Parameter | Symbol | Pellet Cooler 2  |
|-----------|--------|------------------|
|           |        | THC              |
|           |        | (as $C_3H_8$ )   |
|           |        | ppm <sub>w</sub> |

| Analyzer Calibration Error - Instrument Response |                 |      |
|--------------------------------------------------|-----------------|------|
| Zero Gas                                         | $C_{Dir, zero}$ | 0.0  |
| Low-Level Gas                                    | $C_{Dir, low}$  | 28.1 |
| Mid-Level Gas                                    | $C_{Dir, mid}$  | 51.1 |
| High-Level Gas                                   | $C_{Dir, high}$ | 86.2 |

| Analyzer Calibration Error - Results (Percent of Span) |              |     |
|--------------------------------------------------------|--------------|-----|
| Zero Gas                                               | $ACE_{zero}$ | 0.0 |
| Low-Level Gas                                          | $ACE_{low}$  | 0.4 |
| Mid-Level Gas                                          | $ACE_{mid}$  | 2.2 |
| High-Level Gas                                         | $ACE_{high}$ | 0.0 |
| Specification                                          | $ACE_{spec}$ | ±5  |

| System Calibrations - Instrument Response |                      |      |
|-------------------------------------------|----------------------|------|
| Initial Zero                              | $C_{s, zero (pre)}$  | 0.35 |
| Final Zero                                | $C_{s, zero (post)}$ | 0.18 |
| Upscale Gas Standard                      | $C_{MA}$             | 50.0 |
| Initial Upscale                           | $C_{v, up (pre)}$    | 50.2 |
| Final Upscale                             | $C_{v, up (post)}$   | 50.1 |

| System Bias - Results (Percent) |                        |      |
|---------------------------------|------------------------|------|
| Zero (pre)                      | $SB_{i (zero)}$        | 0.3  |
| Zero (post)                     | $SB_{final (zero)}$    | 0.1  |
| Upscale (pre)                   | $SB_{i (upscale)}$     | -0.9 |
| Upscale (post)                  | $SB_{final (upscale)}$ | -1.0 |
| Specification                   | $SB_{spec}$            | NA   |

| System Drift - Results (Percent) |               |      |
|----------------------------------|---------------|------|
| Zero                             | $D_{zero}$    | -0.2 |
| Upscale                          | $D_{upscale}$ | -0.1 |
| Specification                    | $D_{spec}$    | ±3   |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 28 |

| Calibration Correction |           |       |
|------------------------|-----------|-------|
| Raw Average            | $C_{ave}$ | 21.29 |
| Bias Average - Zero    | $C_0$     | N/A   |
| Bias Average - Upscale | $C_M$     | N/A   |
| Corrected Run Average  | $C_{Gas}$ | 21.3  |

Enviva - Wiggins  
Run #9

Date: 11-Oct  
Run Time: 29-1729

| Parameter | Symbol | Pellet Cooler 2                     |
|-----------|--------|-------------------------------------|
|           |        | THC                                 |
|           |        | (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                    |

| Analyzer Calibration Error - Instrument Response |                 |      |
|--------------------------------------------------|-----------------|------|
| Zero Gas                                         | $C_{Dir, zero}$ | 0.0  |
| Low-Level Gas                                    | $C_{Dir, low}$  | 28.1 |
| Mid-Level Gas                                    | $C_{Dir, mid}$  | 51.1 |
| High-Level Gas                                   | $C_{Dir, high}$ | 86.2 |

| Analyzer Calibration Error - Results (Percent of Span) |              |     |
|--------------------------------------------------------|--------------|-----|
| Zero Gas                                               | $ACE_{zero}$ | 0.0 |
| Low-Level Gas                                          | $ACE_{low}$  | 0.4 |
| Mid-Level Gas                                          | $ACE_{mid}$  | 2.2 |
| High-Level Gas                                         | $ACE_{high}$ | 0.0 |
| Specification                                          | $ACE_{spec}$ | ±5  |

| System Calibrations - Instrument Response |                      |      |
|-------------------------------------------|----------------------|------|
| Initial Zero                              | $C_{s, zero (pre)}$  | 0.18 |
| Final Zero                                | $C_{s, zero (post)}$ | 0.2  |
| Upscale Gas Standard                      | $C_{MA}$             | 50.0 |
| Initial Upscale                           | $C_{v, up (pre)}$    | 50.1 |
| Final Upscale                             | $C_{v, up (post)}$   | 49.8 |

| System Bias - Results (Percent) |                        |      |
|---------------------------------|------------------------|------|
| Zero (pre)                      | $SB_{i (zero)}$        | 0.1  |
| Zero (post)                     | $SB_{final (zero)}$    | 0.2  |
| Upscale (pre)                   | $SB_{i (upscale)}$     | -1.0 |
| Upscale (post)                  | $SB_{final (upscale)}$ | -1.3 |
| Specification                   | $SB_{spec}$            | NA   |

| System Drift - Results (Percent) |               |      |
|----------------------------------|---------------|------|
| Zero                             | $D_{zero}$    | 0.0  |
| Upscale                          | $D_{upscale}$ | -0.3 |
| Specification                    | $D_{spec}$    | ±3   |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 28 |

| Calibration Correction |           |             |
|------------------------|-----------|-------------|
| Raw Average            | $C_{ave}$ | 24.84       |
| Bias Average - Zero    | $C_0$     | N/A         |
| Bias Average - Upscale | $C_M$     | N/A         |
| Corrected Run Average  | $C_{Gas}$ | <b>24.8</b> |

Enviva - Wiggins  
Run #4

Date: 10-Oct  
Run Time: 1738-1838

| Parameter | Symbol | Dryer 1                                 |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

| Analyzer Calibration Error - Calibration Standards |                      |       |
|----------------------------------------------------|----------------------|-------|
| Zero Gas                                           | $C_{v, \text{zero}}$ | 0.0   |
| Low-Level Gas                                      | $C_{v, \text{low}}$  | 27.99 |
| Mid-Level Gas                                      | $C_{v, \text{mid}}$  | 50    |
| High-Level Gas                                     | $C_{v, \text{high}}$ | 86.13 |
| Calibration Span                                   | CS                   | 100   |

| Analyzer Calibration Error - Instrument Response |                        |      |
|--------------------------------------------------|------------------------|------|
| Zero Gas                                         | $C_{Dir, \text{zero}}$ | 0.0  |
| Low-Level Gas                                    | $C_{Dir, \text{low}}$  | 28.3 |
| Mid-Level Gas                                    | $C_{Dir, \text{mid}}$  | 50.8 |
| High-Level Gas                                   | $C_{Dir, \text{high}}$ | 86.5 |

| Analyzer Calibration Error - Results (Percent of Span) |                     |     |
|--------------------------------------------------------|---------------------|-----|
| Zero Gas                                               | $ACE_{\text{zero}}$ | 0.0 |
| Low-Level Gas                                          | $ACE_{\text{low}}$  | 1.1 |
| Mid-Level Gas                                          | $ACE_{\text{mid}}$  | 1.6 |
| High-Level Gas                                         | $ACE_{\text{high}}$ | 0.4 |
| Specification                                          | $ACE_{\text{spec}}$ | ±5  |

| System Calibrations - Instrument Response |                             |      |
|-------------------------------------------|-----------------------------|------|
| Initial Zero                              | $C_{s, \text{zero (pre)}}$  | 0    |
| Final Zero                                | $C_{s, \text{zero (post)}}$ | 0.85 |
| Upscale Gas Standard                      | $C_{MA}$                    | 50.0 |
| Initial Upscale                           | $C_{v, \text{up (pre)}}$    | 50.8 |
| Final Upscale                             | $C_{v, \text{up (post)}}$   | 50.9 |

| System Bias - Results (Percent) |                                     |     |
|---------------------------------|-------------------------------------|-----|
| Zero (pre)                      | $SB_{i(\text{zero})}$               | 0.0 |
| Zero (post)                     | $SB_{\text{final}(\text{zero})}$    | 0.9 |
| Upscale (pre)                   | $SB_{i(\text{upscale})}$            | 0.0 |
| Upscale (post)                  | $SB_{\text{final}(\text{upscale})}$ | 0.1 |
| Specification                   | $SB_{\text{spec}}$                  | NA  |

| System Drift - Results (Percent) |                      |     |
|----------------------------------|----------------------|-----|
| Zero                             | $D_{\text{zero}}$    | 0.9 |
| Upscale                          | $D_{\text{upscale}}$ | 0.1 |
| Specification                    | $D_{\text{spec}}$    | ±3  |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 28 |

| Calibration Correction |                  |       |
|------------------------|------------------|-------|
| Raw Average            | $C_{\text{ave}}$ | 66.70 |
| Bias Average - Zero    | $C_0$            | N/A   |
| Bias Average - Upscale | $C_M$            | N/A   |
| Corrected Run Average  | $C_{\text{Gas}}$ | 66.7  |



Enviva - Wiggins  
Run #5

Date: 11-Oct  
Run Time: 1000-1100

| Parameter | Symbol | Dryer 1                                 |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

| Analyzer Calibration Error - Calibration Standards |                      |       |
|----------------------------------------------------|----------------------|-------|
| Zero Gas                                           | $C_{v, \text{zero}}$ | 0.0   |
| Low-Level Gas                                      | $C_{v, \text{low}}$  | 28.0  |
| Mid-Level Gas                                      | $C_{v, \text{mid}}$  | 50.0  |
| High-Level Gas                                     | $C_{v, \text{high}}$ | 86.1  |
| Calibration Span                                   | CS                   | 100.0 |

| Analyzer Calibration Error - Instrument Response |                        |      |
|--------------------------------------------------|------------------------|------|
| Zero Gas                                         | $C_{Dir, \text{zero}}$ | 0.0  |
| Low-Level Gas                                    | $C_{Dir, \text{low}}$  | 28.1 |
| Mid-Level Gas                                    | $C_{Dir, \text{mid}}$  | 51.1 |
| High-Level Gas                                   | $C_{Dir, \text{high}}$ | 86.2 |

| Analyzer Calibration Error - Results (Percent of Span) |                     |     |
|--------------------------------------------------------|---------------------|-----|
| Zero Gas                                               | $ACE_{\text{zero}}$ | 0.0 |
| Low-Level Gas                                          | $ACE_{\text{low}}$  | 0.4 |
| Mid-Level Gas                                          | $ACE_{\text{mid}}$  | 2.2 |
| High-Level Gas                                         | $ACE_{\text{high}}$ | 0.0 |
| Specification                                          | $ACE_{\text{spec}}$ | ±5  |

| System Calibrations - Instrument Response |                             |      |
|-------------------------------------------|-----------------------------|------|
| Initial Zero                              | $C_{s, \text{zero (pre)}}$  | 0.85 |
| Final Zero                                | $C_{s, \text{zero (post)}}$ | 0.15 |
| Upscale Gas Standard                      | $C_{MA}$                    | 50.0 |
| Initial Upscale                           | $C_{v, \text{up (pre)}}$    | 50.9 |
| Final Upscale                             | $C_{v, \text{up (post)}}$   | 50.5 |

| System Bias - Results (Percent) |                               |      |
|---------------------------------|-------------------------------|------|
| Zero (pre)                      | $SB_{i \text{ (zero)}}$       | 0.8  |
| Zero (post)                     | $SB_{\text{final (zero)}}$    | 0.1  |
| Upscale (pre)                   | $SB_{i \text{ (upscale)}}$    | -0.2 |
| Upscale (post)                  | $SB_{\text{final (upscale)}}$ | -0.6 |
| Specification                   | $SB_{\text{spec}}$            | NA   |

| System Drift - Results (Percent) |                      |      |
|----------------------------------|----------------------|------|
| Zero                             | $D_{\text{zero}}$    | -0.7 |
| Upscale                          | $D_{\text{upscale}}$ | -0.4 |
| Specification                    | $D_{\text{spec}}$    | ±3   |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 28 |

| Calibration Correction |                  |       |
|------------------------|------------------|-------|
| Raw Average            | $C_{\text{ave}}$ | 61.92 |
| Bias Average - Zero    | $C_0$            | N/A   |
| Bias Average - Upscale | $C_M$            | N/A   |
| Corrected Run Average  | $C_{\text{Gas}}$ | 61.9  |

Enviva - Wiggins  
Run #6

Date: 11-Oct  
Run Time: 1137-1237

| Parameter | Symbol | Dryer 1                                 |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

| Analyzer Calibration Error - Instrument Response |                 |      |
|--------------------------------------------------|-----------------|------|
| Zero Gas                                         | $C_{Dir, zero}$ | 0.0  |
| Low-Level Gas                                    | $C_{Dir, low}$  | 28.1 |
| Mid-Level Gas                                    | $C_{Dir, mid}$  | 51.1 |
| High-Level Gas                                   | $C_{Dir, high}$ | 86.2 |

| Analyzer Calibration Error - Results (Percent of Span) |              |     |
|--------------------------------------------------------|--------------|-----|
| Zero Gas                                               | $ACE_{zero}$ | 0.0 |
| Low-Level Gas                                          | $ACE_{low}$  | 0.4 |
| Mid-Level Gas                                          | $ACE_{mid}$  | 2.2 |
| High-Level Gas                                         | $ACE_{high}$ | 0.0 |
| Specification                                          | $ACE_{spec}$ | ±5  |

| System Calibrations - Instrument Response |                      |       |
|-------------------------------------------|----------------------|-------|
| Initial Zero                              | $C_{s, zero (pre)}$  | 0.15  |
| Final Zero                                | $C_{s, zero (post)}$ | 0.1   |
| Upscale Gas Standard                      | $C_{MA}$             | 50.0  |
| Initial Upscale                           | $C_{v, up (pre)}$    | 50.5  |
| Final Upscale                             | $C_{v, up (post)}$   | 50.14 |

| System Bias - Results (Percent) |                        |      |
|---------------------------------|------------------------|------|
| Zero (pre)                      | $SB_i (zero)$          | 0.1  |
| Zero (post)                     | $SB_{final} (zero)$    | 0.1  |
| Upscale (pre)                   | $SB_i (upscale)$       | -0.6 |
| Upscale (post)                  | $SB_{final} (upscale)$ | -1.0 |
| Specification                   | $SB_{spec}$            | NA   |

| System Drift - Results (Percent) |               |      |
|----------------------------------|---------------|------|
| Zero                             | $D_{zero}$    | -0.1 |
| Upscale                          | $D_{upscale}$ | -0.4 |
| Specification                    | $D_{spec}$    | ±3   |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 28 |

| Calibration Correction |           |             |
|------------------------|-----------|-------------|
| Raw Average            | $C_{ave}$ | 57.17       |
| Bias Average - Zero    | $C_0$     | N/A         |
| Bias Average - Upscale | $C_M$     | N/A         |
| Corrected Run Average  | $C_{Gas}$ | <b>57.2</b> |

Enviva - Wiggins  
Run 10

Date: 11-Oct  
Run Time: 1811-1911

| Parameter | Symbol | Hammermill 2                            |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

#### Analyzer Calibration Error - Calibration Standards

|                  |                      |       |
|------------------|----------------------|-------|
| Zero Gas         | $C_{v, \text{zero}}$ | 0.0   |
| Low-Level Gas    | $C_{v, \text{low}}$  | 27.99 |
| Mid-Level Gas    | $C_{v, \text{mid}}$  | 50    |
| High-Level Gas   | $C_{v, \text{high}}$ | 86.13 |
| Calibration Span | CS                   | 100   |

#### Analyzer Calibration Error - Instrument Response

|                |                        |       |
|----------------|------------------------|-------|
| Zero Gas       | $C_{Dir, \text{zero}}$ | 0.0   |
| Low-Level Gas  | $C_{Dir, \text{low}}$  | 28.1  |
| Mid-Level Gas  | $C_{Dir, \text{mid}}$  | 51.1  |
| High-Level Gas | $C_{Dir, \text{high}}$ | 86.15 |

#### Analyzer Calibration Error - Results (Percent of Span)

|                |                     |     |
|----------------|---------------------|-----|
| Zero Gas       | $ACE_{\text{zero}}$ | 0.0 |
| Low-Level Gas  | $ACE_{\text{low}}$  | 0.4 |
| Mid-Level Gas  | $ACE_{\text{mid}}$  | 2.2 |
| High-Level Gas | $ACE_{\text{high}}$ | 0.0 |
| Specification  | $ACE_{\text{spec}}$ | ±5  |

#### System Calibrations - Instrument Response

|                      |                             |      |
|----------------------|-----------------------------|------|
| Initial Zero         | $C_{s, \text{zero (pre)}}$  | 0.2  |
| Final Zero           | $C_{s, \text{zero (post)}}$ | 0.08 |
| Upscale Gas Standard | $C_{MA}$                    | 50.0 |
| Initial Upscale      | $C_{v, \text{up (pre)}}$    | 49.8 |
| Final Upscale        | $C_{v, \text{up (post)}}$   | 50   |

#### System Bias - Results (Percent)

|                |                               |      |
|----------------|-------------------------------|------|
| Zero (pre)     | $SB_{i \text{ (zero)}}$       | 0.2  |
| Zero (post)    | $SB_{\text{final (zero)}}$    | 0.0  |
| Upscale (pre)  | $SB_{i \text{ (upscale)}}$    | -1.3 |
| Upscale (post) | $SB_{\text{final (upscale)}}$ | -1.1 |
| Specification  | $SB_{\text{spec}}$            | NA   |

#### System Drift - Results (Percent)

|               |                      |      |
|---------------|----------------------|------|
| Zero          | $D_{\text{zero}}$    | -0.1 |
| Upscale       | $D_{\text{upscale}}$ | 0.2  |
| Specification | $D_{\text{spec}}$    | ±3   |

#### Response Test - Results (seconds)

|               |  |    |
|---------------|--|----|
| Upscale Test  |  | NA |
| Zero Test     |  | NA |
| Response Time |  | 28 |

#### Calibration Correction

|                        |                  |       |
|------------------------|------------------|-------|
| Raw Average            | $C_{\text{ave}}$ | 25.19 |
| Bias Average - Zero    | $C_0$            | N/A   |
| Bias Average - Upscale | $C_M$            | N/A   |
| Corrected Run Average  | $C_{\text{Gas}}$ | 25.2  |

Enviva - Wiggins  
Run 11

Date: 11-Oct  
Run Time: 1935-2035

| Parameter | Symbol | Hammermill 2       |
|-----------|--------|--------------------|
|           |        | THC (as $C_3H_8$ ) |
|           |        | ppm <sub>w</sub>   |

#### Analyzer Calibration Error - Instrument Response

|                |                 |      |
|----------------|-----------------|------|
| Zero Gas       | $C_{Dir, zero}$ | 0.0  |
| Low-Level Gas  | $C_{Dir, low}$  | 28.1 |
| Mid-Level Gas  | $C_{Dir, mid}$  | 51.1 |
| High-Level Gas | $C_{Dir, high}$ | 86.2 |

#### Analyzer Calibration Error - Results (Percent of Span)

|                |              |     |
|----------------|--------------|-----|
| Zero Gas       | $ACE_{zero}$ | 0.0 |
| Low-Level Gas  | $ACE_{low}$  | 0.4 |
| Mid-Level Gas  | $ACE_{mid}$  | 2.2 |
| High-Level Gas | $ACE_{high}$ | 0.0 |
| Specification  | $ACE_{spec}$ | ±5  |

#### System Calibrations - Instrument Response

|                      |                      |       |
|----------------------|----------------------|-------|
| Initial Zero         | $C_{s, zero (pre)}$  | 0.08  |
| Final Zero           | $C_{s, zero (post)}$ | 0.21  |
| Upscale Gas Standard | $C_{MA}$             | 50.0  |
| Initial Upscale      | $C_{v, up (pre)}$    | 50    |
| Final Upscale        | $C_{v, up (post)}$   | 49.85 |

#### System Bias - Results (Percent)

|                |                        |      |
|----------------|------------------------|------|
| Zero (pre)     | $SB_i (zero)$          | 0.0  |
| Zero (post)    | $SB_{final} (zero)$    | 0.2  |
| Upscale (pre)  | $SB_i (upscale)$       | -1.1 |
| Upscale (post) | $SB_{final} (upscale)$ | -1.3 |
| Specification  | $SB_{spec}$            | NA   |

#### System Drift - Results (Percent)

|               |               |      |
|---------------|---------------|------|
| Zero          | $D_{zero}$    | 0.1  |
| Upscale       | $D_{upscale}$ | -0.1 |
| Specification | $D_{spec}$    | ±3   |

#### Response Test - Results (seconds)

|               |  |    |
|---------------|--|----|
| Upscale Test  |  | NA |
| Zero Test     |  | NA |
| Response Time |  | 28 |

#### Calibration Correction

|                        |           |             |
|------------------------|-----------|-------------|
| Raw Average            | $C_{ave}$ | 29.72       |
| Bias Average - Zero    | $C_0$     | N/A         |
| Bias Average - Upscale | $C_M$     | N/A         |
| Corrected Run Average  | $C_{Gas}$ | <b>29.7</b> |

Enviva - Wiggins  
Run 12

Date: 10/11/2013  
Run Time: 2048-2148

| Parameter | Symbol | Hammermill 2                            |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

#### Analyzer Calibration Error - Instrument Response

|                |                 |      |
|----------------|-----------------|------|
| Zero Gas       | $C_{Dir, zero}$ | 0.0  |
| Low-Level Gas  | $C_{Dir, low}$  | 28.1 |
| Mid-Level Gas  | $C_{Dir, mid}$  | 51.1 |
| High-Level Gas | $C_{Dir, high}$ | 86.2 |

#### Analyzer Calibration Error - Results (Percent of Span)

|                |              |     |
|----------------|--------------|-----|
| Zero Gas       | $ACE_{zero}$ | 0.0 |
| Low-Level Gas  | $ACE_{low}$  | 0.4 |
| Mid-Level Gas  | $ACE_{mid}$  | 2.2 |
| High-Level Gas | $ACE_{high}$ | 0.0 |
| Specification  | $ACE_{spec}$ | ±5  |

#### System Calibrations - Instrument Response

|                      |                      |       |
|----------------------|----------------------|-------|
| Initial Zero         | $C_{s, zero (pre)}$  | 0.21  |
| Final Zero           | $C_{s, zero (post)}$ | 0.23  |
| Upscale Gas Standard | $C_{MA}$             | 50.0  |
| Initial Upscale      | $C_{v, up (pre)}$    | 49.85 |
| Final Upscale        | $C_{v, up (post)}$   | 49.9  |

#### System Bias - Results (Percent)

|                |                        |      |
|----------------|------------------------|------|
| Zero (pre)     | $SB_i (zero)$          | 0.2  |
| Zero (post)    | $SB_{final} (zero)$    | 0.2  |
| Upscale (pre)  | $SB_i (upscale)$       | -1.3 |
| Upscale (post) | $SB_{final} (upscale)$ | -1.2 |
| Specification  | $SB_{spec}$            | NA   |

#### System Drift - Results (Percent)

|               |               |     |
|---------------|---------------|-----|
| Zero          | $D_{zero}$    | 0.0 |
| Upscale       | $D_{upscale}$ | 0.0 |
| Specification | $D_{spec}$    | ±3  |

#### Response Test - Results (seconds)

|               |  |    |
|---------------|--|----|
| Upscale Test  |  | NA |
| Zero Test     |  | NA |
| Response Time |  | 28 |

#### Calibration Correction

|                        |           |             |
|------------------------|-----------|-------------|
| Raw Average            | $C_{ave}$ | 24.43       |
| Bias Average - Zero    | $C_0$     | N/A         |
| Bias Average - Upscale | $C_M$     | N/A         |
| Corrected Run Average  | $C_{Gas}$ | <b>24.4</b> |

Enviva - Wiggins  
Run 13

Date: 12-Oct  
Run Time: 0858-0958

| Parameter | Symbol | Pellet Cooler 1                         |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

| Analyzer Calibration Error - Calibration Standards |                      |       |
|----------------------------------------------------|----------------------|-------|
| Zero Gas                                           | $C_{v, \text{zero}}$ | 0.0   |
| Low-Level Gas                                      | $C_{v, \text{low}}$  | 27.99 |
| Mid-Level Gas                                      | $C_{v, \text{mid}}$  | 50    |
| High-Level Gas                                     | $C_{v, \text{high}}$ | 86.13 |
| Calibration Span                                   | CS                   | 100   |

| Analyzer Calibration Error - Instrument Response |                        |       |
|--------------------------------------------------|------------------------|-------|
| Zero Gas                                         | $C_{Dir, \text{zero}}$ | 0.1   |
| Low-Level Gas                                    | $C_{Dir, \text{low}}$  | 28.1  |
| Mid-Level Gas                                    | $C_{Dir, \text{mid}}$  | 50.4  |
| High-Level Gas                                   | $C_{Dir, \text{high}}$ | 86.15 |

| Analyzer Calibration Error - Results (Percent of Span) |                     |     |
|--------------------------------------------------------|---------------------|-----|
| Zero Gas                                               | $ACE_{\text{zero}}$ | 0.1 |
| Low-Level Gas                                          | $ACE_{\text{low}}$  | 0.4 |
| Mid-Level Gas                                          | $ACE_{\text{mid}}$  | 0.8 |
| High-Level Gas                                         | $ACE_{\text{high}}$ | 0.0 |
| Specification                                          | $ACE_{\text{spec}}$ | ±5  |

| System Calibrations - Instrument Response |                             |      |
|-------------------------------------------|-----------------------------|------|
| Initial Zero                              | $C_{s, \text{zero (pre)}}$  | 0.1  |
| Final Zero                                | $C_{s, \text{zero (post)}}$ | 0.35 |
| Upscale Gas Standard                      | $C_{MA}$                    | 50.0 |
| Initial Upscale                           | $C_{v, \text{up (pre)}}$    | 50.4 |
| Final Upscale                             | $C_{v, \text{up (post)}}$   | 50.3 |

| System Bias - Results (Percent) |                                      |      |
|---------------------------------|--------------------------------------|------|
| Zero (pre)                      | $SB_i (\text{zero})$                 | 0.0  |
| Zero (post)                     | $SB_{\text{final}} (\text{zero})$    | 0.3  |
| Upscale (pre)                   | $SB_i (\text{upscale})$              | 0.0  |
| Upscale (post)                  | $SB_{\text{final}} (\text{upscale})$ | -0.1 |
| Specification                   | $SB_{\text{spec}}$                   | NA   |

| System Drift - Results (Percent) |                      |      |
|----------------------------------|----------------------|------|
| Zero                             | $D_{\text{zero}}$    | 0.3  |
| Upscale                          | $D_{\text{upscale}}$ | -0.1 |
| Specification                    | $D_{\text{spec}}$    | ±3   |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 28 |

| Calibration Correction |                  |       |
|------------------------|------------------|-------|
| Raw Average            | $C_{\text{ave}}$ | 39.05 |
| Bias Average - Zero    | $C_0$            | N/A   |
| Bias Average - Upscale | $C_M$            | N/A   |
| Corrected Run Average  | $C_{\text{Gas}}$ | 39.1  |

Enviva - Wiggins  
Run 14

Date: 12-Oct  
Run Time: 1022-1122

| Parameter | Symbol | Pellet Cooler 1                         |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

| Analyzer Calibration Error - Instrument Response |                 |      |
|--------------------------------------------------|-----------------|------|
| Zero Gas                                         | $C_{Dir, zero}$ | 0.1  |
| Low-Level Gas                                    | $C_{Dir, low}$  | 28.1 |
| Mid-Level Gas                                    | $C_{Dir, mid}$  | 50.4 |
| High-Level Gas                                   | $C_{Dir, high}$ | 86.2 |

| Analyzer Calibration Error - Results (Percent of Span) |              |     |
|--------------------------------------------------------|--------------|-----|
| Zero Gas                                               | $ACE_{zero}$ | 0.1 |
| Low-Level Gas                                          | $ACE_{low}$  | 0.4 |
| Mid-Level Gas                                          | $ACE_{mid}$  | 0.8 |
| High-Level Gas                                         | $ACE_{high}$ | 0.0 |
| Specification                                          | $ACE_{spec}$ | ±5  |

| System Calibrations - Instrument Response |                      |       |
|-------------------------------------------|----------------------|-------|
| Initial Zero                              | $C_{s, zero (pre)}$  | 0.35  |
| Final Zero                                | $C_{s, zero (post)}$ | 0.24  |
| Upscale Gas Standard                      | $C_{MA}$             | 50.0  |
| Initial Upscale                           | $C_{v, up (pre)}$    | 50.3  |
| Final Upscale                             | $C_{v, up (post)}$   | 50.25 |

| System Bias - Results (Percent) |                        |      |
|---------------------------------|------------------------|------|
| Zero (pre)                      | $SB_{i (zero)}$        | 0.3  |
| Zero (post)                     | $SB_{final (zero)}$    |      |
| Upscale (pre)                   | $SB_{i (upscale)}$     | -0.1 |
| Upscale (post)                  | $SB_{final (upscale)}$ |      |
| Specification                   | $SB_{spec}$            | NA   |

| System Drift - Results (Percent) |               |      |
|----------------------------------|---------------|------|
| Zero                             | $D_{zero}$    | -0.1 |
| Upscale                          | $D_{upscale}$ | 0.0  |
| Specification                    | $D_{spec}$    | ±3   |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 28 |

| Calibration Correction |           |             |
|------------------------|-----------|-------------|
| Raw Average            | $C_{ave}$ | 33.29       |
| Bias Average - Zero    | $C_0$     | N/A         |
| Bias Average - Upscale | $C_M$     | N/A         |
| Corrected Run Average  | $C_{Gas}$ | <b>33.3</b> |

Enviva - Wiggins  
Run 15

Date: 12-Oct  
Run Time: 1141-124

| Parameter | Symbol | Pellet Cooler 1                         |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

| Analyzer Calibration Error - Instrument Response |                 |      |
|--------------------------------------------------|-----------------|------|
| Zero Gas                                         | $C_{Dir, zero}$ | 0.1  |
| Low-Level Gas                                    | $C_{Dir, low}$  | 28.1 |
| Mid-Level Gas                                    | $C_{Dir, mid}$  | 50.4 |
| High-Level Gas                                   | $C_{Dir, high}$ | 86.2 |

| Analyzer Calibration Error - Results (Percent of Span) |              |     |
|--------------------------------------------------------|--------------|-----|
| Zero Gas                                               | $ACE_{zero}$ | 0.1 |
| Low-Level Gas                                          | $ACE_{low}$  | 0.4 |
| Mid-Level Gas                                          | $ACE_{mid}$  | 0.8 |
| High-Level Gas                                         | $ACE_{high}$ | 0.0 |
| Specification                                          | $ACE_{spec}$ | ±5  |

| System Calibrations - Instrument Response |                      |       |
|-------------------------------------------|----------------------|-------|
| Initial Zero                              | $C_{s, zero (pre)}$  | 0.24  |
| Final Zero                                | $C_{s, zero (post)}$ | 0.33  |
| Upscale Gas Standard                      | $C_{MA}$             | 50.0  |
| Initial Upscale                           | $C_{v, up (pre)}$    | 50.25 |
| Final Upscale                             | $C_{v, up (post)}$   | 50.1  |

| System Bias - Results (Percent) |                        |      |
|---------------------------------|------------------------|------|
| Zero (pre)                      | $SB_i (zero)$          | 0.2  |
| Zero (post)                     | $SB_{final} (zero)$    | 0.3  |
| Upscale (pre)                   | $SB_i (upscale)$       | -0.1 |
| Upscale (post)                  | $SB_{final} (upscale)$ | -0.3 |
| Specification                   | $SB_{spec}$            | NA   |

| System Drift - Results (Percent) |               |      |
|----------------------------------|---------------|------|
| Zero                             | $D_{zero}$    | 0.1  |
| Upscale                          | $D_{upscale}$ | -0.1 |
| Specification                    | $D_{spec}$    | ±3   |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 28 |

| Calibration Correction |           |             |
|------------------------|-----------|-------------|
| Raw Average            | $C_{ave}$ | 35.65       |
| Bias Average - Zero    | $C_0$     | N/A         |
| Bias Average - Upscale | $C_M$     | N/A         |
| Corrected Run Average  | $C_{Gas}$ | <b>35.7</b> |



Enviva - Wiggins  
Run 16

Date: 12-Oct  
Run Time: 1509-1609

| Parameter | Symbol | Aspirator                               |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

| Analyzer Calibration Error - Calibration Standards |                      |       |
|----------------------------------------------------|----------------------|-------|
| Zero Gas                                           | $C_{v, \text{zero}}$ | 0.0   |
| Low-Level Gas                                      | $C_{v, \text{low}}$  | 258.1 |
| Mid-Level Gas                                      | $C_{v, \text{mid}}$  | 507.1 |
| High-Level Gas                                     | $C_{v, \text{high}}$ | 836.9 |
| Calibration Span                                   | CS                   | 1000  |

| Analyzer Calibration Error - Instrument Response |                        |       |
|--------------------------------------------------|------------------------|-------|
| Zero Gas                                         | $C_{Dir, \text{zero}}$ | 1.1   |
| Low-Level Gas                                    | $C_{Dir, \text{low}}$  | 260   |
| Mid-Level Gas                                    | $C_{Dir, \text{mid}}$  | 507   |
| High-Level Gas                                   | $C_{Dir, \text{high}}$ | 838.3 |

| Analyzer Calibration Error - Results (Percent of Span) |                     |     |
|--------------------------------------------------------|---------------------|-----|
| Zero Gas                                               | $ACE_{\text{zero}}$ | 0.1 |
| Low-Level Gas                                          | $ACE_{\text{low}}$  | 0.7 |
| Mid-Level Gas                                          | $ACE_{\text{mid}}$  | 0.0 |
| High-Level Gas                                         | $ACE_{\text{high}}$ | 0.1 |
| Specification                                          | $ACE_{\text{spec}}$ | ±5  |

| System Calibrations - Instrument Response |                             |       |
|-------------------------------------------|-----------------------------|-------|
| Initial Zero                              | $C_{s, \text{zero (pre)}}$  | 1.1   |
| Final Zero                                | $C_{s, \text{zero (post)}}$ | 2.4   |
| Upscale Gas Standard                      | $C_{MA}$                    | 836.9 |
| Initial Upscale                           | $C_{v, \text{up (pre)}}$    | 838.3 |
| Final Upscale                             | $C_{v, \text{up (post)}}$   | 837   |

| System Bias - Results (Percent) |                                      |      |
|---------------------------------|--------------------------------------|------|
| Zero (pre)                      | $SB_i (\text{zero})$                 | 0.0  |
| Zero (post)                     | $SB_{\text{final}} (\text{zero})$    | 0.1  |
| Upscale (pre)                   | $SB_i (\text{upscale})$              | 0.0  |
| Upscale (post)                  | $SB_{\text{final}} (\text{upscale})$ | -0.1 |
| Specification                   | $SB_{\text{spec}}$                   | NA   |

| System Drift - Results (Percent) |                      |      |
|----------------------------------|----------------------|------|
| Zero                             | $D_{\text{zero}}$    | 0.1  |
| Upscale                          | $D_{\text{upscale}}$ | -0.1 |
| Specification                    | $D_{\text{spec}}$    | ±3   |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 28 |

| Calibration Correction |                  |         |
|------------------------|------------------|---------|
| Raw Average            | $C_{\text{ave}}$ | 1074.70 |
| Bias Average - Zero    | $C_0$            | N/A     |
| Bias Average - Upscale | $C_M$            | N/A     |
| Corrected Run Average  | $C_{\text{Gas}}$ | 1074.7  |

Enviva - Wiggins  
Run 17

Date: 12-Oct  
Run Time: 1636-1736

| Parameter | Symbol | Aspirator                               |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

| Analyzer Calibration Error - Calibration Standards |                      |        |
|----------------------------------------------------|----------------------|--------|
| Zero Gas                                           | $C_{v, \text{zero}}$ | 0.0    |
| Low-Level Gas                                      | $C_{v, \text{low}}$  | 258.1  |
| Mid-Level Gas                                      | $C_{v, \text{mid}}$  | 507.1  |
| High-Level Gas                                     | $C_{v, \text{high}}$ | 836.9  |
| Calibration Span                                   | CS                   | 1000.0 |

| Analyzer Calibration Error - Instrument Response |                        |       |
|--------------------------------------------------|------------------------|-------|
| Zero Gas                                         | $C_{Dir, \text{zero}}$ | 1.1   |
| Low-Level Gas                                    | $C_{Dir, \text{low}}$  | 260.0 |
| Mid-Level Gas                                    | $C_{Dir, \text{mid}}$  | 507.0 |
| High-Level Gas                                   | $C_{Dir, \text{high}}$ | 838.3 |

| Analyzer Calibration Error - Results (Percent of Span) |                     |     |
|--------------------------------------------------------|---------------------|-----|
| Zero Gas                                               | $ACE_{\text{zero}}$ | 0.1 |
| Low-Level Gas                                          | $ACE_{\text{low}}$  | 0.7 |
| Mid-Level Gas                                          | $ACE_{\text{mid}}$  | 0.0 |
| High-Level Gas                                         | $ACE_{\text{high}}$ | 0.1 |
| Specification                                          | $ACE_{\text{spec}}$ | ±5  |

| System Calibrations - Instrument Response |                             |       |
|-------------------------------------------|-----------------------------|-------|
| Initial Zero                              | $C_{s, \text{zero (pre)}}$  | 2.40  |
| Final Zero                                | $C_{s, \text{zero (post)}}$ | 1.4   |
| Upscale Gas Standard                      | $C_{MA}$                    | 836.9 |
| Initial Upscale                           | $C_{v, \text{up (pre)}}$    | 837   |
| Final Upscale                             | $C_{v, \text{up (post)}}$   | 837.5 |

| System Bias - Results (Percent) |                                      |      |
|---------------------------------|--------------------------------------|------|
| Zero (pre)                      | $SB_i (\text{zero})$                 | 0.1  |
| Zero (post)                     | $SB_{\text{final}} (\text{zero})$    | 0.0  |
| Upscale (pre)                   | $SB_i (\text{upscale})$              | -0.1 |
| Upscale (post)                  | $SB_{\text{final}} (\text{upscale})$ | -0.1 |
| Specification                   | $SB_{\text{spec}}$                   | NA   |

| System Drift - Results (Percent) |                      |      |
|----------------------------------|----------------------|------|
| Zero                             | $D_{\text{zero}}$    | -0.1 |
| Upscale                          | $D_{\text{upscale}}$ | 0.1  |
| Specification                    | $D_{\text{spec}}$    | ±3   |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 28 |

| Calibration Correction |                  |              |
|------------------------|------------------|--------------|
| Raw Average            | $C_{\text{ave}}$ | 957.00       |
| Bias Average - Zero    | $C_0$            | N/A          |
| Bias Average - Upscale | $C_M$            | N/A          |
| Corrected Run Average  | $C_{\text{Gas}}$ | <b>957.0</b> |

Enviva - Wiggins  
Run 18

Date: 12-Oct  
Run Time: 1800-1900

| Parameter | Symbol | Aspirator                               |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

| Analyzer Calibration Error - Instrument Response |                 |       |
|--------------------------------------------------|-----------------|-------|
| Zero Gas                                         | $C_{Dir, zero}$ | 1.1   |
| Low-Level Gas                                    | $C_{Dir, low}$  | 260.0 |
| Mid-Level Gas                                    | $C_{Dir, mid}$  | 507.0 |
| High-Level Gas                                   | $C_{Dir, high}$ | 838.3 |

| Analyzer Calibration Error - Results (Percent of Span) |              |     |
|--------------------------------------------------------|--------------|-----|
| Zero Gas                                               | $ACE_{zero}$ | 0.1 |
| Low-Level Gas                                          | $ACE_{low}$  | 0.7 |
| Mid-Level Gas                                          | $ACE_{mid}$  | 0.0 |
| High-Level Gas                                         | $ACE_{high}$ | 0.1 |
| Specification                                          | $ACE_{spec}$ | ±5  |

| System Calibrations - Instrument Response |                      |       |
|-------------------------------------------|----------------------|-------|
| Initial Zero                              | $C_{s, zero (pre)}$  | 1.40  |
| Final Zero                                | $C_{s, zero (post)}$ | 2     |
| Upscale Gas Standard                      | $C_{MA}$             | 836.9 |
| Initial Upscale                           | $C_{v, up (pre)}$    | 837.5 |
| Final Upscale                             | $C_{v, up (post)}$   | 835   |

| System Bias - Results (Percent) |                        |      |
|---------------------------------|------------------------|------|
| Zero (pre)                      | $SB_{i (zero)}$        | 0.0  |
| Zero (post)                     | $SB_{final (zero)}$    | 0.1  |
| Upscale (pre)                   | $SB_{i (upscale)}$     | -0.1 |
| Upscale (post)                  | $SB_{final (upscale)}$ | -0.3 |
| Specification                   | $SB_{spec}$            | NA   |

| System Drift - Results (Percent) |               |      |
|----------------------------------|---------------|------|
| Zero                             | $D_{zero}$    | 0.1  |
| Upscale                          | $D_{upscale}$ | -0.3 |
| Specification                    | $D_{spec}$    | ±3   |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 28 |

| Calibration Correction |           |               |
|------------------------|-----------|---------------|
| Raw Average            | $C_{ave}$ | 1200.00       |
| Bias Average - Zero    | $C_0$     | N/A           |
| Bias Average - Upscale | $C_M$     | N/A           |
| Corrected Run Average  | $C_{Gas}$ | <b>1200.0</b> |

Enviva - Wiggins  
Run 19

Date: 13-Oct  
Run Time: 0921-1021

| Parameter | Symbol | Dryer 2                                 |  |
|-----------|--------|-----------------------------------------|--|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |  |
|           |        | ppm <sub>w</sub>                        |  |

| Analyzer Calibration Error - Calibration Standards |                      |       |       |
|----------------------------------------------------|----------------------|-------|-------|
| Zero Gas                                           | $C_{v, \text{zero}}$ | 0.0   | 0.0   |
| Low-Level Gas                                      | $C_{v, \text{low}}$  | 258.1 | 27.99 |
| Mid-Level Gas                                      | $C_{v, \text{mid}}$  | 507.1 | 50    |
| High-Level Gas                                     | $C_{v, \text{high}}$ | 836.9 | 86.13 |
| Calibration Span                                   | CS                   | 1000  | 100   |

| Analyzer Calibration Error - Instrument Response |                        |       |       |
|--------------------------------------------------|------------------------|-------|-------|
| Zero Gas                                         | $C_{Dir, \text{zero}}$ | 1.0   | 1.0   |
| Low-Level Gas                                    | $C_{Dir, \text{low}}$  | 259   | 28.4  |
| Mid-Level Gas                                    | $C_{Dir, \text{mid}}$  | 506.8 | 50.34 |
| High-Level Gas                                   | $C_{Dir, \text{high}}$ | 837.3 | 86.24 |

| Analyzer Calibration Error - Results (Percent of Span) |                     |      |     |
|--------------------------------------------------------|---------------------|------|-----|
| Zero Gas                                               | $ACE_{\text{zero}}$ | 0.1  | 1.0 |
| Low-Level Gas                                          | $ACE_{\text{low}}$  | 0.3  | 1.5 |
| Mid-Level Gas                                          | $ACE_{\text{mid}}$  | -0.1 | 0.7 |
| High-Level Gas                                         | $ACE_{\text{high}}$ | 0.0  | 0.1 |
| Specification                                          | $ACE_{\text{spec}}$ | ±5   | ±8  |

| System Calibrations - Instrument Response |                             |       |       |
|-------------------------------------------|-----------------------------|-------|-------|
| Initial Zero                              | $C_{s, \text{zero (pre)}}$  | 1.0   | 1.0   |
| Final Zero                                | $C_{s, \text{zero (post)}}$ | 1.6   | 1.6   |
| Upscale Gas Standard                      | $C_{MA}$                    | 507.1 | 50.0  |
| Initial Upscale                           | $C_{v, \text{up (pre)}}$    | 506.8 | 50.34 |
| Final Upscale                             | $C_{v, \text{up (post)}}$   | 504   | 50.6  |

| System Bias - Results (Percent) |                               |      |     |
|---------------------------------|-------------------------------|------|-----|
| Zero (pre)                      | $SB_i (\text{zero})$          | 0.0  | 0.0 |
| Zero (post)                     | $SB_{\text{final (zero)}}$    | 0.1  | 0.6 |
| Upscale (pre)                   | $SB_i (\text{upscale})$       | 0.0  | 0.0 |
| Upscale (post)                  | $SB_{\text{final (upscale)}}$ | -0.3 | 0.3 |
| Specification                   | $SB_{\text{spec}}$            | NA   | NA  |

| System Drift - Results (Percent) |                      |      |     |
|----------------------------------|----------------------|------|-----|
| Zero                             | $D_{\text{zero}}$    | 0.1  | 0.6 |
| Upscale                          | $D_{\text{upscale}}$ | -0.3 | 0.3 |
| Specification                    | $D_{\text{spec}}$    | ±3   | ±6  |

| Response Test - Results (seconds) |  |    |    |
|-----------------------------------|--|----|----|
| Upscale Test                      |  | NA | NA |
| Zero Test                         |  | NA | NA |
| Response Time                     |  | 28 | 28 |

| Calibration Correction |                  |      |      |
|------------------------|------------------|------|------|
| Raw Average            | $C_{\text{ave}}$ | 91.8 | 91.8 |
| Bias Average - Zero    | $C_0$            | N/A  | N/A  |
| Bias Average - Upscale | $C_M$            | N/A  | N/A  |
| Corrected Run Average  | $C_{\text{Gas}}$ | 91.8 | 91.8 |

Enviva - Wiggins  
Run 20

Date: 13-Oct  
Run Time: 1104-1204

| Parameter | Symbol | Dryer 2                                 |  |
|-----------|--------|-----------------------------------------|--|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |  |
|           |        | ppm <sub>w</sub>                        |  |

| Analyzer Calibration Error - Calibration Standards |                      |        |       |
|----------------------------------------------------|----------------------|--------|-------|
| Zero Gas                                           | $C_{v, \text{zero}}$ | 0.0    | 0.0   |
| Low-Level Gas                                      | $C_{v, \text{low}}$  | 258.1  | 28.0  |
| Mid-Level Gas                                      | $C_{v, \text{mid}}$  | 507.1  | 50.0  |
| High-Level Gas                                     | $C_{v, \text{high}}$ | 836.9  | 86.1  |
| Calibration Span                                   | CS                   | 1000.0 | 100.0 |

| Analyzer Calibration Error - Instrument Response |                        |       |      |
|--------------------------------------------------|------------------------|-------|------|
| Zero Gas                                         | $C_{Dir, \text{zero}}$ | 1.0   | 1.0  |
| Low-Level Gas                                    | $C_{Dir, \text{low}}$  | 259.0 | 28.4 |
| Mid-Level Gas                                    | $C_{Dir, \text{mid}}$  | 506.8 | 50.3 |
| High-Level Gas                                   | $C_{Dir, \text{high}}$ | 837.3 | 86.2 |

| Analyzer Calibration Error - Results (Percent of Span) |                     |      |     |
|--------------------------------------------------------|---------------------|------|-----|
| Zero Gas                                               | $ACE_{\text{zero}}$ | 0.1  | 1.0 |
| Low-Level Gas                                          | $ACE_{\text{low}}$  | 0.3  | 1.5 |
| Mid-Level Gas                                          | $ACE_{\text{mid}}$  | -0.1 | 0.7 |
| High-Level Gas                                         | $ACE_{\text{high}}$ | 0.0  | 0.1 |
| Specification                                          | $ACE_{\text{spec}}$ | ±5   | ±8  |

| System Calibrations - Instrument Response |                             |       |      |
|-------------------------------------------|-----------------------------|-------|------|
| Initial Zero                              | $C_{s, \text{zero (pre)}}$  | 1.60  | 1.60 |
| Final Zero                                | $C_{s, \text{zero (post)}}$ | 0.42  | 0.42 |
| Upscale Gas Standard                      | $C_{MA}$                    | 507.1 | 50.0 |
| Initial Upscale                           | $C_{v, \text{up (pre)}}$    | 504   | 50.6 |
| Final Upscale                             | $C_{v, \text{up (post)}}$   | 503   | 50.4 |

| System Bias - Results (Percent) |                               |      |      |
|---------------------------------|-------------------------------|------|------|
| Zero (pre)                      | $SB_{i \text{ (zero)}}$       | 0.1  | 0.6  |
| Zero (post)                     | $SB_{\text{final (zero)}}$    | -0.1 | -0.6 |
| Upscale (pre)                   | $SB_{i \text{ (upscale)}}$    | -0.3 | 0.3  |
| Upscale (post)                  | $SB_{\text{final (upscale)}}$ | -0.4 | 0.1  |
| Specification                   | $SB_{\text{spec}}$            | NA   | NA   |

| System Drift - Results (Percent) |                      |      |      |
|----------------------------------|----------------------|------|------|
| Zero                             | $D_{\text{zero}}$    | -0.1 | -1.2 |
| Upscale                          | $D_{\text{upscale}}$ | -0.1 | -0.2 |
| Specification                    | $D_{\text{spec}}$    | ±3   | ±3   |

| Response Test - Results (seconds) |  |    |    |
|-----------------------------------|--|----|----|
| Upscale Test                      |  | NA | NA |
| Zero Test                         |  | NA | NA |
| Response Time                     |  | 28 | 28 |

| Calibration Correction |                  |      |      |
|------------------------|------------------|------|------|
| Raw Average            | $C_{\text{ave}}$ | 81.2 | 81.2 |
| Bias Average - Zero    | $C_0$            | N/A  | N/A  |
| Bias Average - Upscale | $C_M$            | N/A  | N/A  |
| Corrected Run Average  | $C_{\text{Gas}}$ | 81.2 | 81.2 |

Enviva - Wiggins  
Run 21

Date: 13-Oct  
Run Time: 1231-1347  
Paused (1236-1252)

| Parameter | Symbol | Dryer 2                                 |  |
|-----------|--------|-----------------------------------------|--|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |  |
|           |        | ppm <sub>w</sub>                        |  |

| Analyzer Calibration Error - Instrument Response |                 |       |       |
|--------------------------------------------------|-----------------|-------|-------|
| Zero Gas                                         | $C_{Dir, zero}$ | 1.0   | 1.00  |
| Low-Level Gas                                    | $C_{Dir, low}$  | 259.0 | 28.40 |
| Mid-Level Gas                                    | $C_{Dir, mid}$  | 506.8 | 50.34 |
| High-Level Gas                                   | $C_{Dir, high}$ | 837.3 | 86.24 |

| Analyzer Calibration Error - Results (Percent of Span) |              |      |     |
|--------------------------------------------------------|--------------|------|-----|
| Zero Gas                                               | $ACE_{zero}$ | 0.1  | 1.0 |
| Low-Level Gas                                          | $ACE_{low}$  | 0.3  | 1.5 |
| Mid-Level Gas                                          | $ACE_{mid}$  | -0.1 | 0.7 |
| High-Level Gas                                         | $ACE_{high}$ | 0.0  | 0.1 |
| Specification                                          | $ACE_{spec}$ | ±5   | ±8  |

| System Calibrations - Instrument Response |                      |       |      |
|-------------------------------------------|----------------------|-------|------|
| Initial Zero                              | $C_{s, zero (pre)}$  | 0.42  | 0.42 |
| Final Zero                                | $C_{s, zero (post)}$ | 0.3   | 0.3  |
| Upscale Gas Standard                      | $C_{MA}$             | 507.1 | 50.0 |
| Initial Upscale                           | $C_{v, up (pre)}$    | 503   | 50.4 |
| Final Upscale                             | $C_{v, up (post)}$   | 503.5 | 50.2 |

| System Bias - Results (Percent) |                        |      |      |
|---------------------------------|------------------------|------|------|
| Zero (pre)                      | $SB_i (zero)$          | -0.1 | -0.6 |
| Zero (post)                     | $SB_{final} (zero)$    | -0.1 | -0.7 |
| Upscale (pre)                   | $SB_i (upscale)$       | -0.4 | 0.1  |
| Upscale (post)                  | $SB_{final} (upscale)$ | -0.3 | -0.1 |
| Specification                   | $SB_{spec}$            | NA   | NA   |

| System Drift - Results (Percent) |               |     |      |
|----------------------------------|---------------|-----|------|
| Zero                             | $D_{zero}$    | 0.0 | -0.1 |
| Upscale                          | $D_{upscale}$ | 0.1 | -0.2 |
| Specification                    | $D_{spec}$    | ±3  | ±6   |

| Response Test - Results (seconds) |  |    |    |
|-----------------------------------|--|----|----|
| Upscale Test                      |  | NA | NA |
| Zero Test                         |  | NA | NA |
| Response Time                     |  | 28 | 31 |

| Calibration Correction |           |      |      |
|------------------------|-----------|------|------|
| Raw Average            | $C_{ave}$ | 97.2 | 97.2 |
| Bias Average - Zero    | $C_0$     | N/A  | N/A  |
| Bias Average - Upscale | $C_M$     | N/A  | N/A  |
| Corrected Run Average  | $C_{Gas}$ | 97.2 | 97.2 |

## **APPENDIX C**

### **Method 320 Data**

|                  |                |
|------------------|----------------|
| Company          | ACT            |
| Analyst Initials | CJT            |
| Parameters       | EPA Method 320 |
| # Samples        | 21 Runs        |

|             |                      |
|-------------|----------------------|
| Client #    | 1911                 |
| Job #       | 0913-111             |
| PO #        | 3134 1911            |
| Report Date | V0.62 13.10.18.12.58 |

| Compound        | Sample ID / Concentration (ppmv wet) |                       |                       |                    |                    |                    |
|-----------------|--------------------------------------|-----------------------|-----------------------|--------------------|--------------------|--------------------|
|                 | Data Runs                            |                       |                       |                    |                    |                    |
|                 | GMH Run 1                            | GMH Run 2             | GMH Run 3             | Dryer 1 Run 1      | Dryer 1 Run 2      | Dryer 1 Run 3      |
| Acrolein        | 1.13 J                               | 1.20 J                | 1.15 J                | 1.79 J             | 1.72 ND            | 1.72 ND            |
| Formaldehyde    | 0.742                                | 0.629                 | 0.561                 | 3.32               | 1.60               | 1.78               |
| Methanol        | 0.508                                | 0.460                 | 0.376                 | 2.52               | 1.70               | 1.59               |
| Phenol          | 0.88 ND                              | 0.88 ND               | 0.88 ND               | 2.04 ND            | 2.04 ND            | 2.04 ND            |
| Propionaldehyde | 0.234 ND                             | 0.234 ND              | 0.251 J               | 0.644 J            | 0.714 J            | 0.505 J            |
| acetaldehyde    | 0.756 J                              | 0.721 J               | 0.723 J               | 1.27 ND            | 1.27 ND            | 1.27 ND            |
|                 | Data Runs                            |                       |                       |                    |                    |                    |
|                 | Pellet Cooler 2 Run 1                | Pellet Cooler 2 Run 2 | Pellet Cooler 2 Run 3 | Hammermill 2 Run 1 | Hammermill 2 Run 2 | Hammermill 2 Run 3 |
| Acrolein        | 1.29 J                               | 1.21 J                | 1.33 J                | 0.980 J            | 0.975 J            | 0.965 ND           |
| Formaldehyde    | 1.07                                 | 0.663                 | 1.84                  | 1.04               | 1.14               | 1.11               |
| Methanol        | 0.797                                | 0.680 J               | 0.844                 | 0.189 J            | 0.211 J            | 0.204 J            |
| Phenol          | 1.08 ND                              | 1.08 ND               | 1.08 ND               | 1.08 ND            | 1.08 ND            | 1.08 ND            |
| Propionaldehyde | 0.246 J                              | 0.246 ND              | 0.359 J               | 0.233 J            | 0.243 J            | 0.263 J            |
| acetaldehyde    | 0.864 J                              | 0.825 J               | 0.786 J               | 0.715 J            | 0.710 J            | 0.707 ND           |
|                 | Data Runs                            |                       |                       |                    |                    |                    |
|                 | Pellet Cooler 1 Run 1                | Pellet Cooler 1 Run 2 | Pellet Cooler 1 Run 3 | Aspirator Run 1    | Aspirator Run 2    | Aspirator Run 3    |
| Acrolein        | 0.976 J                              | 1.02 J                | 1.35 J                | 3.16               | 3.12               | 2.25 J             |
| Formaldehyde    | 1.44                                 | 1.25                  | 1.26                  | 1.05 ND            | 1.58 J             | 1.06 J             |
| Methanol        | 0.537                                | 0.327                 | 0.351                 | 8.30               | 8.90               | 8.16               |
| Phenol          | 1.00 J                               | 0.98 ND               | 0.98 ND               | 2.73 ND            | 2.73 ND            | 2.73 ND            |
| Propionaldehyde | 0.381 J                              | 0.290 J               | 0.236 ND              | 3.00 ND            | 3.00 ND            | 3.00 ND            |
| acetaldehyde    | 0.691 J                              | 0.695 J               | 0.759 J               | 4.65               | 3.92 J             | 3.75               |
|                 | Data Runs                            |                       |                       |                    |                    |                    |
|                 | Dryer 2 Run 1                        | Dryer 2 Run 2         | Dryer 2 Run 3         |                    |                    |                    |
| Acrolein        | 1.90 J                               | 2.59                  | 2.49                  |                    |                    |                    |
| Formaldehyde    | 6.40                                 | 6.58                  | 6.76                  |                    |                    |                    |
| Methanol        | 18.8                                 | 10.2                  | 10.8                  |                    |                    |                    |
| Phenol          | 2.78 ND                              | 2.78 ND               | 2.78 ND               |                    |                    |                    |
| Propionaldehyde | 2.37                                 | 1.38                  | 1.70                  |                    |                    |                    |
| acetaldehyde    | 0.967 J                              | 3.28                  | 1.02 J                |                    |                    |                    |



|                  |                |
|------------------|----------------|
| Company          | ACT            |
| Analyst Initials | CJT            |
| Parameters       | EPA Method 320 |
| # Samples        | 21 Runs        |

|             |                      |
|-------------|----------------------|
| Client #    | 1911                 |
| Job #       | 0913-111             |
| PO #        | 3134 1911            |
| Report Date | V0.62 13.10.18.12.58 |

# Minimum Detectable Concentration - Default

|                        | GMH | Acrolein (ppm) | SEC (ppm) | Formaldehyde (ppm) | SEC (ppm) | Methanol (ppm) | SEC (ppm) | Phenol (ppm) | SEC (ppm) | Propionaldehyde (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) |
|------------------------|-----|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|-----------|-----------------------|-----------|--------------------|-----------|
| Run 1                  |     | 1.13           | 0.502     | 0.742              | 0.0719    | 0.51           | 0.0912    | 0.88         | 0.44      | 0.234                 | 0.120     | 0.756              | 0.371     |
| Run 2                  |     | 1.20           | 0.474     | 0.629              | 0.0684    | 0.46           | 0.0935    | 0.88         | 0.44      | 0.234                 | 0.118     | 0.721              | 0.351     |
| Run 3                  |     | 1.15           | 0.480     | 0.561              | 0.0677    | 0.38           | 0.0913    | 0.88         | 0.45      | 0.251                 | 0.113     | 0.723              | 0.355     |
| Average SEC(ppm):      |     | 0.485          |           | 0.0693             |           | 0.0920         |           | 0.44         |           | 0.117                 |           | 0.359              |           |
| MDC(ppm):              |     | 0.971          |           | 0.139              |           | 0.184          |           | 0.88         |           | 0.234                 |           | 0.718              |           |
| <b>Dryer 1</b>         |     |                |           |                    |           |                |           |              |           |                       |           |                    |           |
| Run 1                  |     | 1.79           | 0.917     | 3.32               | 0.131     | 2.52           | 0.296     | 2.04         | 1.00      | 0.644                 | 0.239     | 1.270              | 0.679     |
| Run 2                  |     | 1.72           | 0.850     | 1.60               | 0.126     | 1.70           | 0.293     | 2.04         | 1.07      | 0.714                 | 0.227     | 1.270              | 0.628     |
| Run 3                  |     | 1.72           | 0.812     | 1.78               | 0.120     | 1.59           | 0.287     | 2.04         | 0.99      | 0.505                 | 0.213     | 1.270              | 0.598     |
| Average SEC(ppm):      |     | 0.859          |           | 0.126              |           | 0.292          |           | 1.02         |           | 0.226                 |           | 0.635              |           |
| MDC(ppm):              |     | 1.72           |           | 0.252              |           | 0.584          |           | 2.04         |           | 0.452                 |           | 1.27               |           |
| <b>Pellet Cooler 2</b> |     |                |           |                    |           |                |           |              |           |                       |           |                    |           |
| Run 1                  |     | 1.29           | 0.496     | 1.07               | 0.0711    | 0.80           | 0.0813    | 1.08         | 0.54      | 0.246                 | 0.125     | 0.864              | 0.370     |
| Run 2                  |     | 1.21           | 0.497     | 0.663              | 0.0704    | 0.68           | 0.0823    | 1.08         | 0.54      | 0.246                 | 0.120     | 0.825              | 0.370     |
| Run 3                  |     | 1.33           | 0.507     | 1.84               | 0.0732    | 0.84           | 0.0844    | 1.09         | 0.55      | 0.359                 | 0.124     | 0.786              | 0.378     |
| Average SEC(ppm):      |     | 0.500          |           | 0.0716             |           | 0.0826         |           | 0.54         |           | 0.123                 |           | 0.373              |           |
| MDC(ppm):              |     | 1.00           |           | 0.143              |           | 0.165          |           | 1.08         |           | 0.246                 |           | 0.745              |           |
| <b>Hammermill 2</b>    |     |                |           |                    |           |                |           |              |           |                       |           |                    |           |
| Run 1                  |     | 0.98           | 0.480     | 1.04               | 0.0677    | 0.19           | 0.0809    | 1.08         | 0.54      | 0.233                 | 0.113     | 0.715              | 0.353     |
| Run 2                  |     | 0.97           | 0.480     | 1.14               | 0.0682    | 0.21           | 0.0832    | 1.08         | 0.54      | 0.243                 | 0.122     | 0.710              | 0.352     |
| Run 3                  |     | 0.97           | 0.488     | 1.11               | 0.0675    | 0.20           | 0.0839    | 1.08         | 0.55      | 0.263                 | 0.113     | 0.707              | 0.356     |
| Average SEC(ppm):      |     | 0.483          |           | 0.0678             |           | 0.0826         |           | 0.54         |           | 0.116                 |           | 0.354              |           |
| MDC(ppm):              |     | 0.965          |           | 0.136              |           | 0.165          |           | 1.08         |           | 0.232                 |           | 0.707              |           |
| <b>Pellet Cooler 1</b> |     |                |           |                    |           |                |           |              |           |                       |           |                    |           |
| Run 1                  |     | 0.98           | 0.467     | 1.44               | 0.0646    | 0.54           | 0.0738    | 1.00         | 0.50      | 0.381                 | 0.118     | 0.691              | 0.344     |
| Run 2                  |     | 1.02           | 0.463     | 1.25               | 0.0635    | 0.33           | 0.0723    | 0.98         | 0.50      | 0.290                 | 0.119     | 0.695              | 0.341     |
| Run 3                  |     | 1.35           | 0.467     | 1.26               | 0.0647    | 0.35           | 0.0690    | 0.98         | 0.48      | 0.236                 | 0.118     | 0.759              | 0.345     |
| Average SEC(ppm):      |     | 0.466          |           | 0.0642             |           | 0.0717         |           | 0.49         |           | 0.118                 |           | 0.343              |           |
| MDC(ppm):              |     | 0.931          |           | 0.128              |           | 0.143          |           | 0.98         |           | 0.236                 |           | 0.686              |           |
| <b>Aspirator</b>       |     |                |           |                    |           |                |           |              |           |                       |           |                    |           |
| Run 1                  |     | 3.16           | 0.827     | 1.055              | 0.535     | 8.30           | 0.244     | 2.73         | 1.15      | 3.00                  | 1.53      | 4.65               | 0.616     |
| Run 2                  |     | 3.12           | 0.808     | 1.58               | 0.467     | 8.90           | 0.256     | 2.73         | 1.60      | 3.00                  | 1.35      | 3.92               | 0.602     |
| Run 3                  |     | 2.25           | 0.916     | 1.063              | 0.580     | 8.16           | 0.265     | 2.73         | 1.34      | 3.00                  | 1.62      | 3.75               | 0.681     |
| Average SEC(ppm):      |     | 0.850          |           | 0.527              |           | 0.255          |           | 1.36         |           | 1.50                  |           | 0.633              |           |
| MDC(ppm):              |     | 1.70           |           | 1.05               |           | 0.510          |           | 2.73         |           | 3.00                  |           | 1.27               |           |
| <b>Dryer 2</b>         |     |                |           |                    |           |                |           |              |           |                       |           |                    |           |
| Run 1                  |     | 1.90           | 0.631     | 6.40               | 0.108     | 18.8           | 0.539     | 2.78         | 1.29      | 2.37                  | 0.222     | 0.967              | 0.472     |
| Run 2                  |     | 2.59           | 0.617     | 6.58               | 0.105     | 10.2           | 0.549     | 2.78         | 1.55      | 1.38                  | 0.260     | 3.28               | 0.457     |
| Run 3                  |     | 2.49           | 0.633     | 6.76               | 0.112     | 10.8           | 0.531     | 2.78         | 1.33      | 1.70                  | 0.263     | 1.02               | 0.473     |
| Average SEC(ppm):      |     | 0.627          |           | 0.108              |           | 0.540          |           | 1.39         |           | 0.248                 |           | 0.467              |           |
| MDC(ppm):              |     | 1.25           |           | 0.217              |           | 1.08           |           | 2.78         |           | 0.497                 |           | 0.934              |           |

|                  |                |
|------------------|----------------|
| Company          | ACT            |
| Analyst Initials | CJT            |
| Parameters       | EPA Method 320 |
| # Samples        | 21 Runs        |

|             |                      |
|-------------|----------------------|
| Client #    | 1911                 |
| Job #       | 0913-111             |
| PO #        | 3134 1911            |
| Report Date | VO.62 13.10.18.12.58 |

| GMH Run 1            |            |                      |    |                |           |                    |           |                |           |              |           |                       |           |                    |           |       |
|----------------------|------------|----------------------|----|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|-----------|-----------------------|-----------|--------------------|-----------|-------|
| Date                 | Method     | Filename             | DF | Acrolein (ppm) | SEC (ppm) | Formaldehyde (ppm) | SEC (ppm) | Methanol (ppm) | SEC (ppm) | Phenol (ppm) | SEC (ppm) | Propionaldehyde (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) |       |
| 10/10/2013 9:17      | 0913-111.A | 13_10_10_0917_37_936 | 1  | 1.58           | 0.517     | 0.846              | 0.0700    | 0.434          | 0.0900    | 0.88         | 0.43      | 0.234                 | 0.114     | 0.718              | 0.383     |       |
| 10/10/2013 9:18      | 0913-111.A | 13_10_10_0918_38_786 | 1  | 0.971          | 0.472     | 0.708              | 0.0680    | 0.457          | 0.0880    | 0.88         | 0.43      | 0.234                 | 0.112     | 0.718              | 0.346     |       |
| 10/10/2013 9:19      | 0913-111.A | 13_10_10_0919_39_506 | 1  | 0.971          | 0.504     | 0.778              | 0.0720    | 0.443          | 0.0920    | 0.88         | 0.43      | 0.234                 | 0.115     | 0.718              | 0.373     |       |
| 10/10/2013 9:20      | 0913-111.A | 13_10_10_0920_40_336 | 1  | 0.971          | 0.464     | 0.696              | 0.0690    | 0.467          | 0.0860    | 0.88         | 0.44      | 0.234                 | 0.111     | 0.718              | 0.345     |       |
| 10/10/2013 9:21      | 0913-111.A | 13_10_10_0921_41_006 | 1  | 1.59           | 0.483     | 0.633              | 0.0700    | 0.454          | 0.0920    | 0.88         | 0.43      | 0.234                 | 0.114     | 0.993              | 0.365     |       |
| 10/10/2013 9:22      | 0913-111.A | 13_10_10_0922_41_806 | 1  | 0.971          | 0.493     | 0.708              | 0.0680    | 0.457          | 0.0880    | 0.88         | 0.44      | 0.234                 | 0.114     | 0.718              | 0.360     |       |
| 10/10/2013 9:23      | 0913-111.A | 13_10_10_0923_42_538 | 1  | 0.971          | 0.464     | 0.814              | 0.0660    | 0.469          | 0.0880    | 0.88         | 0.44      | 0.234                 | 0.111     | 0.718              | 0.341     |       |
| 10/10/2013 9:24      | 0913-111.A | 13_10_10_0924_43_348 | 1  | 1.15           | 0.462     | 0.696              | 0.0630    | 0.481          | 0.0900    | 0.88         | 0.44      | 0.234                 | 0.111     | 0.718              | 0.336     |       |
| 10/10/2013 9:25      | 0913-111.A | 13_10_10_0925_44_128 | 1  | 0.971          | 0.465     | 0.696              | 0.0680    | 0.477          | 0.0900    | 0.88         | 0.43      | 0.234                 | 0.110     | 0.718              | 0.347     |       |
| 10/10/2013 9:26      | 0913-111.A | 13_10_10_0926_44_818 | 1  | 0.971          | 0.498     | 0.782              | 0.0660    | 0.407          | 0.0870    | 0.88         | 0.44      | 0.234                 | 0.115     | 0.750              | 0.375     |       |
| 10/10/2013 9:27      | 0913-111.A | 13_10_10_0927_45_518 | 1  | 0.971          | 0.459     | 0.759              | 0.0660    | 0.491          | 0.0870    | 0.88         | 0.44      | 0.234                 | 0.108     | 0.718              | 0.335     |       |
| 10/10/2013 9:28      | 0913-111.A | 13_10_10_0928_46_429 | 1  | 1.16           | 0.499     | 0.820              | 0.0690    | 0.383          | 0.0890    | 0.88         | 0.44      | 0.234                 | 0.116     | 0.718              | 0.370     |       |
| 10/10/2013 9:29      | 0913-111.A | 13_10_10_0929_47_159 | 1  | 1.61           | 0.471     | 0.784              | 0.0680    | 0.445          | 0.0870    | 0.88         | 0.43      | 0.234                 | 0.113     | 0.718              | 0.348     |       |
| 10/10/2013 9:30      | 0913-111.A | 13_10_10_0930_47_959 | 1  | 0.971          | 0.454     | 0.803              | 0.0660    | 0.537          | 0.0880    | 0.88         | 0.44      | 0.234                 | 0.111     | 0.718              | 0.332     |       |
| 10/10/2013 9:31      | 0913-111.A | 13_10_10_0931_48_709 | 1  | 0.971          | 0.477     | 0.775              | 0.0700    | 0.442          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.118     | 0.718              | 0.353     |       |
| 10/10/2013 9:32      | 0913-111.A | 13_10_10_0932_49_519 | 1  | 0.971          | 0.460     | 0.746              | 0.0660    | 0.477          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.113     | 0.718              | 0.348     |       |
| 10/10/2013 9:33      | 0913-111.A | 13_10_10_0933_50_289 | 1  | 0.971          | 0.491     | 0.723              | 0.0730    | 0.473          | 0.0890    | 0.88         | 0.44      | 0.234                 | 0.118     | 0.718              | 0.357     |       |
| 10/10/2013 9:34      | 0913-111.A | 13_10_10_0934_50_859 | 1  | 0.971          | 0.491     | 0.731              | 0.0680    | 0.456          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.117     | 0.718              | 0.360     |       |
| 10/10/2013 9:35      | 0913-111.A | 13_10_10_0935_51_689 | 1  | 0.971          | 0.469     | 0.739              | 0.0680    | 0.477          | 0.0870    | 0.88         | 0.44      | 0.234                 | 0.112     | 0.718              | 0.349     |       |
| 10/10/2013 9:36      | 0913-111.A | 13_10_10_0936_52_430 | 1  | 0.971          | 0.483     | 0.650              | 0.0710    | 0.446          | 0.0890    | 0.88         | 0.44      | 0.234                 | 0.117     | 0.718              | 0.359     |       |
| 10/10/2013 9:37      | 0913-111.A | 13_10_10_0937_53_149 | 1  | 1.32           | 0.467     | 0.751              | 0.0700    | 0.446          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.116     | 0.718              | 0.373     |       |
| 10/10/2013 9:38      | 0913-111.A | 13_10_10_0938_53_929 | 1  | 0.971          | 0.467     | 0.668              | 0.0680    | 0.467          | 0.0890    | 0.88         | 0.44      | 0.234                 | 0.115     | 0.718              | 0.345     |       |
| 10/10/2013 9:39      | 0913-111.A | 13_10_10_0939_54_720 | 1  | 0.971          | 0.483     | 0.800              | 0.0720    | 0.416          | 0.0930    | 0.88         | 0.44      | 0.234                 | 0.118     | 0.718              | 0.354     |       |
| 10/10/2013 9:40      | 0913-111.A | 13_10_10_0940_55_430 | 1  | 0.971          | 0.487     | 0.703              | 0.0680    | 0.393          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.117     | 0.718              | 0.357     |       |
| 10/10/2013 9:41      | 0913-111.A | 13_10_10_0941_56_230 | 1  | 0.971          | 0.564     | 0.976              | 0.0710    | 0.435          | 0.0870    | 0.88         | 0.44      | 0.234                 | 0.118     | 0.718              | 0.370     |       |
| 10/10/2013 9:42      | 0913-111.A | 13_10_10_0942_57_010 | 1  | 1.10           | 0.501     | 0.613              | 0.0700    | 0.470          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.117     | 0.718              | 0.367     |       |
| 10/10/2013 9:43      | 0913-111.A | 13_10_10_0943_57_650 | 1  | 0.971          | 0.473     | 0.697              | 0.0690    | 0.415          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.112     | 0.718              | 0.347     |       |
| 10/10/2013 9:44      | 0913-111.A | 13_10_10_0944_58_440 | 1  | 0.971          | 0.477     | 0.736              | 0.0670    | 0.393          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.113     | 0.718              | 0.349     |       |
| 10/10/2013 9:45      | 0913-111.A | 13_10_10_0945_59_220 | 1  | 0.971          | 0.482     | 0.634              | 0.0670    | 0.388          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.109     | 0.718              | 0.355     |       |
| 10/10/2013 9:47      | 0913-111.A | 13_10_10_0947_00_000 | 1  | 1.48           | 0.477     | 0.644              | 0.0690    | 0.459          | 0.0890    | 0.88         | 0.44      | 0.234                 | 0.116     | 0.742              | 0.355     |       |
| 10/10/2013 9:48      | 0913-111.A | 13_10_10_0948_00_730 | 1  | 0.971          | 0.461     | 0.774              | 0.0660    | 0.420          | 0.0880    | 0.88         | 0.44      | 0.234                 | 0.112     | 0.718              | 0.337     |       |
| 10/10/2013 9:49      | 0913-111.A | 13_10_10_0949_01_480 | 1  | 1.29           | 0.487     | 0.773              | 0.0640    | 0.501          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.112     | 0.718              | 0.359     |       |
| 10/10/2013 9:50      | 0913-111.A | 13_10_10_0950_02_280 | 1  | 0.971          | 0.483     | 0.721              | 0.0680    | 0.464          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.115     | 0.718              | 0.353     |       |
| 10/10/2013 9:51      | 0913-111.A | 13_10_10_0951_03_020 | 1  | 0.971          | 0.476     | 0.710              | 0.0700    | 0.437          | 0.0870    | 0.88         | 0.44      | 0.234                 | 0.117     | 0.718              | 0.353     |       |
| 10/10/2013 9:52      | 0913-111.A | 13_10_10_0952_03_761 | 1  | 0.971          | 0.489     | 0.663              | 0.0700    | 0.523          | 0.0880    | 0.88         | 0.44      | 0.234                 | 0.119     | 0.735              | 0.364     |       |
| 10/10/2013 9:53      | 0913-111.A | 13_10_10_0953_04_581 | 1  | 0.971          | 0.500     | 0.789              | 0.0690    | 0.523          | 0.0880    | 0.88         | 0.44      | 0.234                 | 0.118     | 0.718              | 0.368     |       |
| 10/10/2013 9:54      | 0913-111.A | 13_10_10_0954_05_281 | 1  | 0.971          | 0.455     | 0.737              | 0.0660    | 0.667          | 0.0900    | 0.88         | 0.44      | 0.234                 | 0.114     | 0.740              | 0.339     |       |
| 10/10/2013 9:55      | 0913-111.A | 13_10_10_0955_06_091 | 1  | 1.41           | 0.469     | 0.869              | 0.0710    | 0.647          | 0.0950    | 0.88         | 0.44      | 0.234                 | 0.118     | 0.718              | 0.351     |       |
| 10/10/2013 9:56      | 0913-111.A | 13_10_10_0956_06_811 | 1  | 0.971          | 0.513     | 0.980              | 0.0740    | 0.645          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.124     | 0.718              | 0.382     |       |
| 10/10/2013 9:57      | 0913-111.A | 13_10_10_0957_07_611 | 1  | 1.30           | 0.482     | 0.870              | 0.0720    | 0.667          | 0.0960    | 0.88         | 0.44      | 0.234                 | 0.122     | 0.990              | 0.356     |       |
| 10/10/2013 9:58      | 0913-111.A | 13_10_10_0958_08_331 | 1  | 0.971          | 0.488     | 0.920              | 0.0700    | 0.688          | 0.0950    | 0.88         | 0.44      | 0.234                 | 0.117     | 0.947              | 0.366     |       |
| 10/10/2013 9:59      | 0913-111.A | 13_10_10_0959_09_071 | 1  | 1.42           | 0.496     | 0.677              | 0.0700    | 0.649          | 0.0930    | 0.88         | 0.44      | 0.234                 | 0.119     | 0.872              | 0.364     |       |
| 10/10/2013 10:00     | 0913-111.A | 13_10_10_1000_09_811 | 1  | 0.971          | 0.492     | 0.821              | 0.0700    | 0.564          | 0.0920    | 0.88         | 0.44      | 0.234                 | 0.117     | 0.747              | 0.360     |       |
| 10/10/2013 10:01     | 0913-111.A | 13_10_10_1001_10_591 | 1  | 1.62           | 0.494     | 0.864              | 0.0720    | 0.597          | 0.0920    | 0.88         | 0.44      | 0.234                 | 0.123     | 0.718              | 0.376     |       |
| 10/10/2013 10:02     | 0913-111.A | 13_10_10_1002_11_391 | 1  | 0.971          | 0.487     | 0.650              | 0.0680    | 0.580          | 0.0920    | 0.88         | 0.44      | 0.234                 | 0.114     | 0.866              | 0.363     |       |
| 10/10/2013 10:03     | 0913-111.A | 13_10_10_1003_12_111 | 1  | 1.80           | 0.503     | 0.846              | 0.0710    | 0.577          | 0.0930    | 0.88         | 0.44      | 0.234                 | 0.118     | 0.718              | 0.368     |       |
| 10/10/2013 10:04     | 0913-111.A | 13_10_10_1004_12_832 | 1  | 0.978          | 0.474     | 0.794              | 0.0690    | 0.664          | 0.0920    | 0.88         | 0.44      | 0.234                 | 0.118     | 0.718              | 0.356     |       |
| 10/10/2013 10:05     | 0913-111.A | 13_10_10_1005_13_542 | 1  | 1.21           | 0.489     | 0.719              | 0.0760    | 0.593          | 0.0890    | 0.88         | 0.44      | 0.234                 | 0.124     | 0.718              | 0.364     |       |
| 10/10/2013 10:06     | 0913-111.A | 13_10_10_1006_14_372 | 1  | 0.971          | 0.476     | 0.718              | 0.0710    | 0.644          | 0.0930    | 0.88         | 0.44      | 0.234                 | 0.118     | 0.718              | 0.353     |       |
| 10/10/2013 10:07     | 0913-111.A | 13_10_10_1007_15_182 | 1  | 1.07           | 0.497     | 0.769              | 0.0720    | 0.727          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.125     | 0.718              | 0.367     |       |
| 10/10/2013 10:08     | 0913-111.A | 13_10_10_1008_15_892 | 1  | 1.28           | 0.512     | 0.804              | 0.0750    | 0.660          | 0.0950    | 0.88         | 0.44      | 0.234                 | 0.124     | 0.718              | 0.383     |       |
| 10/10/2013 10:09     | 0913-111.A | 13_10_10_1009_16_712 | 1  | 1.61           | 0.551     | 0.828              | 0.0820    | 0.582          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.133     | 0.718              | 0.406     |       |
| 10/10/2013 10:10     | 0913-111.A | 13_10_10_1010_17_422 | 1  | 0.986          | 0.569     | 0.708              | 0.0780    | 0.620          | 0.0940    | 0.88         | 0.44      | 0.234                 | 0.133     | 0.718              | 0.417     |       |
| 10/10/2013 10:11     | 0913-111.A | 13_10_10_1011_18_172 | 1  | 1.39           | 0.537     | 0.667              | 0.0780    | 0.631          | 0.0920    | 0.88         | 0.44      | 0.234                 | 0.134     | 0.900              | 0.395     |       |
| 10/10/2013 10:12     | 0913-111.A | 13_10_10_1012_18_922 | 1  | 0.971          | 0.535     | 0.703              | 0.0770    | 0.435          | 0.0950    | 0.88         | 0.43      | 0.234                 | 0.130     | 1.28               | 0.393     |       |
| 10/10/2013 10:13     | 0913-111.A | 13_10_10_1013_19_722 | 1  | 1.48           | 0.582     | 0.825              | 0.0840    | 0.497          | 0.0970    | 0.88         | 0.43      | 0.234                 | 0.139     | 1.05               | 0.429     |       |
| 10/10/2013 10:14     | 0913-111.A | 13_10_10_1014_20_512 | 1  | 0.999          | 0.682     | 0.594              | 0.0930    | 0.453          | 0.0950    | 0.88         | 0.44      | 0.234                 | 0.155     | 0.718              | 0.495     |       |
| 10/10/2013 10:15     | 0913-111.A | 13_10_10_1015_21_272 | 1  | 1.71           | 0.651     | 0.563              | 0.0920    | 0.501          | 0.0970    | 0.88         | 0.43      | 0.234                 | 0.150     | 0.718              | 0.477     |       |
| 10/10/2013 10:16     | 0913-111.A | 13_10_10_1016_21_893 | 1  | 0.971          | 0.705     | 0.431              | 0.0960    | 0.400          | 0.102     | 0.88         | 0.43      | 0.234                 | 0.158     | 0.718              | 0.515     |       |
| 10/10/2013 10:17     | 0913-111.A | 13_10_10_1017_22_633 | 1  | 1.15           | 0.698     | 0.729              | 0.100     | 0.361          | 0.100     | 0.88         | 0.44      | 0.234                 | 0.162     | 0.718              | 0.514     |       |
| Average Conc. (ppm): |            |                      |    | 1              | 1.13      | 0.502              | 0.742     | 0.0719         | 0.508     | 0.0912       | 0.88      | 0.44                  | 0.234     | 0.120              | 0.756     | 0.371 |

| GMH Run 2        |            |                      |    |                |           |                    |           |                |           |              |           |                       |           |                     |           |      |       |       |        |       |        |      |      |       |       |       |       |
|------------------|------------|----------------------|----|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|-----------|-----------------------|-----------|---------------------|-----------|------|-------|-------|--------|-------|--------|------|------|-------|-------|-------|-------|
| Date             | Method     | Filename             | DF | Acrolein (ppm) | SEC (ppm) | Formaldehyde (ppm) | SEC (ppm) | Methanol (ppm) | SEC (ppm) | Phenol (ppm) | SEC (ppm) | Propionaldehyde (ppm) | SEC (ppm) | acetaldehyde (ppm)  | SEC (ppm) |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:36 | 0913-111-A | 13_10_10_1036_37_174 | 1  | 1.30           | 0.438     | 0.768              | 0.0660    | 0.421          | 0.0890    | 0.88         | 0.43      | 0.234                 | 0.115     | 0.718               | 0.324     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:37 | 0913-111-A | 13_10_10_1037_37_934 | 1  | 1.05           | 0.483     | 0.596              | 0.0660    | 0.415          | 0.0890    | 0.88         | 0.43      | 0.234                 | 0.121     | 0.718               | 0.353     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:38 | 0913-111-A | 13_10_10_1038_38_251 | 1  | 1.86           | 0.468     | 0.688              | 0.0660    | 0.442          | 0.0890    | 0.88         | 0.43      | 0.234                 | 0.119     | 0.718               | 0.346     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:39 | 0913-111-A | 13_10_10_1039_39_435 | 1  | 0.971          | 0.474     | 0.653              | 0.0670    | 0.423          | 0.0920    | 0.88         | 0.43      | 0.234                 | 0.118     | 0.718               | 0.344     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:40 | 0913-111-A | 13_10_10_1040_40_195 | 1  | 0.971          | 0.480     | 0.745              | 0.0690    | 0.402          | 0.0890    | 0.88         | 0.43      | 0.234                 | 0.116     | 0.718               | 0.355     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:41 | 0913-111-A | 13_10_10_1041_41_005 | 1  | 0.971          | 0.462     | 0.729              | 0.0690    | 0.409          | 0.0900    | 0.88         | 0.44      | 0.234                 | 0.117     | 0.718               | 0.341     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:42 | 0913-111-A | 13_10_10_1042_41_815 | 1  | 1.32           | 0.491     | 0.653              | 0.0740    | 0.403          | 0.0920    | 0.88         | 0.44      | 0.234                 | 0.121     | 0.718               | 0.363     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:43 | 0913-111-A | 13_10_10_1043_42_565 | 1  | 1.41           | 0.700     | 0.688              | 0.0740    | 0.411          | 0.088     | 0.88         | 0.43      | 0.234                 | 0.118     | 0.718               | 0.353     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:44 | 0913-111-A | 13_10_10_1044_43_005 | 1  | 0.982          | 0.450     | 0.665              | 0.0700    | 0.465          | 0.0930    | 0.88         | 0.44      | 0.234                 | 0.117     | 0.718               | 0.330     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:45 | 0913-111-A | 13_10_10_1045_44_015 | 1  | 1.05           | 0.464     | 0.705              | 0.0710    | 0.439          | 0.0920    | 0.88         | 0.44      | 0.234                 | 0.119     | 0.718               | 0.344     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:46 | 0913-111-A | 13_10_10_1046_44_775 | 1  | 0.971          | 0.441     | 0.685              | 0.0690    | 0.408          | 0.0950    | 0.88         | 0.44      | 0.234                 | 0.118     | 0.718               | 0.335     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:47 | 0913-111-A | 13_10_10_1047_45_015 | 1  | 1.46           | 0.657     | 0.650              | 0.0720    | 0.427          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.119     | 0.718               | 0.361     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:48 | 0913-111-A | 13_10_10_1048_45_375 | 1  | 1.06           | 0.461     | 0.746              | 0.0690    | 0.387          | 0.0920    | 0.88         | 0.44      | 0.234                 | 0.116     | 0.718               | 0.339     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:49 | 0913-111-A | 13_10_10_1049_47_915 | 1  | 0.971          | 0.475     | 0.640              | 0.0660    | 0.410          | 0.0920    | 0.88         | 0.44      | 0.234                 | 0.118     | 0.718               | 0.351     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:50 | 0913-111-A | 13_10_10_1050_47_135 | 1  | 0.971          | 0.470     | 0.668              | 0.0680    | 0.482          | 0.0940    | 0.88         | 0.43      | 0.234                 | 0.116     | 0.718               | 0.350     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:51 | 0913-111-A | 13_10_10_1051_48_646 | 1  | 1.13           | 0.477     | 0.622              | 0.0640    | 0.490          | 0.0950    | 0.88         | 0.43      | 0.234                 | 0.116     | 0.718               | 0.348     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:52 | 0913-111-A | 13_10_10_1052_48_677 | 1  | 2.24           | 0.690     | 0.481              | 0.0720    | 0.458          | 0.0990    | 0.88         | 0.44      | 0.234                 | 0.117     | 0.718               | 0.359     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:53 | 0913-111-A | 13_10_10_1053_50_266 | 1  | 1.20           | 0.487     | 0.608              | 0.0700    | 0.453          | 0.0930    | 0.88         | 0.44      | 0.234                 | 0.122     | 0.718               | 0.361     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:54 | 0913-111-A | 13_10_10_1054_50_976 | 1  | 1.59           | 0.487     | 0.684              | 0.0670    | 0.427          | 0.0940    | 0.88         | 0.44      | 0.234                 | 0.118     | 0.760               | 0.361     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:55 | 0913-111-A | 13_10_10_1055_51_781 | 1  | 0.971          | 0.474     | 0.616              | 0.0670    | 0.498          | 0.0930    | 0.88         | 0.44      | 0.234                 | 0.116     | 0.718               | 0.351     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:56 | 0913-111-A | 13_10_10_1056_52_428 | 1  | 1.55           | 0.670     | 0.439              | 0.0670    | 0.439          | 0.0950    | 0.88         | 0.44      | 0.234                 | 0.117     | 0.718               | 0.350     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:57 | 0913-111-A | 13_10_10_1057_53_186 | 1  | 0.971          | 0.438     | 0.650              | 0.0640    | 0.431          | 0.0940    | 0.88         | 0.43      | 0.234                 | 0.114     | 0.718               | 0.330     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:58 | 0913-111-A | 13_10_10_1058_53_966 | 1  | 0.971          | 0.502     | 0.663              | 0.0700    | 0.438          | 0.0930    | 0.88         | 0.43      | 0.234                 | 0.120     | 0.718               | 0.370     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 10:59 | 0913-111-A | 13_10_10_1059_54_676 | 1  | 0.982          | 0.476     | 0.570              | 0.0670    | 0.420          | 0.0940    | 0.88         | 0.44      | 0.234                 | 0.117     | 0.718               | 0.353     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:00 | 0913-111-A | 13_10_10_1100_55_506 | 1  | 0.981          | 0.463     | 0.713              | 0.0690    | 0.420          | 0.0940    | 0.88         | 0.43      | 0.234                 | 0.117     | 0.718               | 0.343     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:01 | 0913-111-A | 13_10_10_1101_56_248 | 1  | 0.981          | 0.483     | 0.582              | 0.0680    | 0.428          | 0.0930    | 0.88         | 0.44      | 0.234                 | 0.117     | 0.718               | 0.353     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:02 | 0913-111-A | 13_10_10_1102_56_996 | 1  | 1.16           | 0.489     | 0.681              | 0.0700    | 0.402          | 0.0940    | 0.88         | 0.43      | 0.234                 | 0.121     | 0.718               | 0.359     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:03 | 0913-111-A | 13_10_10_1103_57_807 | 1  | 2.29           | 0.482     | 0.659              | 0.0690    | 0.524          | 0.0930    | 0.88         | 0.43      | 0.234                 | 0.122     | 0.718               | 0.357     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:04 | 0913-111-A | 13_10_10_1104_58_627 | 1  | 1.13           | 0.465     | 0.692              | 0.0650    | 0.415          | 0.0950    | 0.88         | 0.43      | 0.234                 | 0.117     | 0.718               | 0.347     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:05 | 0913-111-A | 13_10_10_1105_59_345 | 1  | 0.470          | 0.474     | 0.616              | 0.0710    | 0.465          | 0.0960    | 0.88         | 0.43      | 0.234                 | 0.118     | 0.718               | 0.361     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:07 | 0913-111-A | 13_10_10_1107_60_087 | 1  | 1.32           | 0.474     | 0.596              | 0.0690    | 0.499          | 0.0950    | 0.88         | 0.43      | 0.234                 | 0.116     | 0.718               | 0.348     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:08 | 0913-111-A | 13_10_10_1108_60_897 | 1  | 1.25           | 0.482     | 0.602              | 0.0710    | 0.468          | 0.0960    | 0.88         | 0.43      | 0.234                 | 0.122     | 0.718               | 0.357     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:09 | 0913-111-A | 13_10_10_1109_61_573 | 1  | 1.13           | 0.465     | 0.838              | 0.0660    | 0.508          | 0.0960    | 0.88         | 0.43      | 0.234                 | 0.117     | 0.718               | 0.354     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:10 | 0913-111-A | 13_10_10_1110_62_367 | 1  | 1.38           | 0.465     | 0.607              | 0.0660    | 0.400          | 0.0930    | 0.88         | 0.43      | 0.234                 | 0.116     | 0.718               | 0.342     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:11 | 0913-111-A | 13_10_10_1111_63_141 | 1  | 0.449          | 0.971     | 0.520              | 0.0710    | 0.433          | 0.0960    | 0.88         | 0.44      | 0.234                 | 0.117     | 0.718               | 0.356     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:12 | 0913-111-A | 13_10_10_1112_63_917 | 1  | 1.10           | 0.466     | 0.657              | 0.0660    | 0.441          | 0.0950    | 0.88         | 0.44      | 0.234                 | 0.116     | 0.718               | 0.344     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:13 | 0913-111-A | 13_10_10_1113_64_727 | 1  | 0.971          | 0.454     | 0.581              | 0.0670    | 0.470          | 0.0960    | 0.88         | 0.44      | 0.234                 | 0.113     | 0.718               | 0.343     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:14 | 0913-111-A | 13_10_10_1114_65_055 | 1  | 0.971          | 0.500     | 0.594              | 0.0700    | 0.439          | 0.0940    | 0.88         | 0.44      | 0.234                 | 0.125     | 0.718               | 0.377     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:15 | 0913-111-A | 13_10_10_1115_66_218 | 1  | 1.14           | 0.483     | 0.565              | 0.0670    | 0.443          | 0.0940    | 0.88         | 0.43      | 0.234                 | 0.118     | 0.718               | 0.354     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:16 | 0913-111-A | 13_10_10_1116_67_048 | 1  | 1.54           | 0.487     | 0.669              | 0.0690    | 0.489          | 0.0950    | 0.88         | 0.44      | 0.234                 | 0.123     | 0.718               | 0.351     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:17 | 0913-111-A | 13_10_10_1117_67_798 | 1  | 1.47           | 0.439     | 0.564              | 0.0680    | 0.495          | 0.0970    | 0.88         | 0.44      | 0.234                 | 0.115     | 0.718               | 0.327     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:18 | 0913-111-A | 13_10_10_1118_68_548 | 1  | 0.971          | 0.441     | 0.586              | 0.0670    | 0.489          | 0.0920    | 0.88         | 0.44      | 0.234                 | 0.111     | 0.718               | 0.327     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:19 | 0913-111-A | 13_10_10_1119_69_278 | 1  | 0.971          | 0.451     | 0.455              | 0.0680    | 0.458          | 0.0940    | 0.88         | 0.44      | 0.234                 | 0.117     | 0.718               | 0.340     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:20 | 0913-111-A | 13_10_10_1120_69_066 | 1  | 0.972          | 0.491     | 0.582              | 0.0690    | 0.495          | 0.0950    | 0.88         | 0.44      | 0.234                 | 0.120     | 0.718               | 0.357     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:21 | 0913-111-A | 13_10_10_1121_70_108 | 1  | 0.971          | 0.491     | 0.603              | 0.0710    | 0.480          | 0.0960    | 0.88         | 0.44      | 0.234                 | 0.122     | 0.718               | 0.358     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:22 | 0913-111-A | 13_10_10_1122_71_598 | 1  | 1.11           | 0.463     | 0.554              | 0.0680    | 0.485          | 0.0950    | 0.88         | 0.44      | 0.234                 | 0.118     | 0.718               | 0.341     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:23 | 0913-111-A | 13_10_10_1123_72_398 | 1  | 1.10           | 0.495     | 0.562              | 0.0720    | 0.425          | 0.0930    | 0.88         | 0.44      | 0.234                 | 0.120     | 0.718               | 0.359     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:24 | 0913-111-A | 13_10_10_1124_73_208 | 1  | 1.14           | 0.470     | 0.631              | 0.0710    | 0.428          | 0.0960    | 0.88         | 0.44      | 0.234                 | 0.119     | 0.718               | 0.356     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:25 | 0913-111-A | 13_10_10_1125_73_918 | 1  | 0.971          | 0.461     | 0.681              | 0.0680    | 0.504          | 0.0940    | 0.88         | 0.44      | 0.234                 | 0.120     | 0.718               | 0.345     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:26 | 0913-111-A | 13_10_10_1126_74_788 | 1  | 1.42           | 0.474     | 0.642              | 0.0700    | 0.503          | 0.0940    | 0.88         | 0.44      | 0.234                 | 0.119     | 0.718               | 0.349     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:27 | 0913-111-A | 13_10_10_1127_75_150 | 1  | 1.34           | 0.483     | 0.715              | 0.0680    | 0.566          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.118     | 0.718               | 0.360     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:28 | 0913-111-A | 13_10_10_1128_76_309 | 1  | 0.971          | 0.511     | 0.540              | 0.0710    | 0.428          | 0.0960    | 0.88         | 0.44      | 0.234                 | 0.118     | 0.718               | 0.363     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:29 | 0913-111-A | 13_10_10_1129_77_059 | 1  | 1.14           | 0.479     | 0.652              | 0.0690    | 0.429          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.117     | 0.718               | 0.351     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:30 | 0913-111-A | 13_10_10_1130_78_759 | 1  | 0.971          | 0.495     | 0.737              | 0.0690    | 0.526          | 0.0960    | 0.88         | 0.44      | 0.234                 | 0.119     | 0.718               | 0.369     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:31 | 0913-111-A | 13_10_10_1130_78_879 | 1  | 1.28           | 0.484     | 0.594              | 0.0670    | 0.461          | 0.0930    | 0.88         | 0.44      | 0.234                 | 0.115     | 0.798               | 0.352     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:32 | 0913-111-A | 13_10_10_1132_79_159 | 1  | 2.07           | 0.459     | 0.582              | 0.0650    | 0.465          | 0.0930    | 0.88         | 0.44      | 0.234                 | 0.114     | 0.718               | 0.339     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:33 | 0913-111-A | 13_10_10_1133_80_140 | 1  | 0.971          | 0.491     | 0.533              | 0.0710    | 0.429          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.117     | 0.718               | 0.362     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:34 | 0913-111-A | 13_10_10_1134_80_699 | 1  | 0.971          | 0.483     | 0.634              | 0.0680    | 0.521          | 0.0920    | 0.88         | 0.44      | 0.234                 | 0.114     | 0.718               | 0.338     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:35 | 0913-111-A | 13_10_10_1135_81_859 | 1  | 0.971          | 0.500     | 0.641              | 0.0710    | 0.497          | 0.0950    | 0.88         | 0.44      | 0.234                 | 0.119     | 0.746               | 0.366     |      |       |       |        |       |        |      |      |       |       |       |       |
| 10/10/2013 11:36 | 0913-111-A | 13_10_10_1136_82_399 | 1  | 1.18           | 0.505     | 0.445              | 0.0710    | 0.534          | 0.0930    | 0.88         | 0.45      | 0.234                 | 0.120     | 0.718               | 0.366     |      |       |       |        |       |        |      |      |       |       |       |       |
|                  |            |                      |    |                |           |                    |           |                |           |              |           |                       |           | Average Conc. (ppm) | 1         | 1.20 | 0.474 | 0.629 | 0.0694 | 0.460 | 0.0935 | 0.88 | 0.44 | 0.234 | 0.118 | 0.721 | 0.351 |

|                  |                |
|------------------|----------------|
| Company          | ACT            |
| Analyst Initials | CJT            |
| Parameters       | EPA Method 320 |
| # Samples        | 21 Runs        |

|             |                      |
|-------------|----------------------|
| Client #    | 1911                 |
| Job #       | 0913-111             |
| PO #        | 3134 1911            |
| Report Date | V0.62 13.10.18.12.58 |

| GMH Run 3            |            |                      |    |                |           |                    |           |                |           |              |           |                       |           |                    |           |       |
|----------------------|------------|----------------------|----|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|-----------|-----------------------|-----------|--------------------|-----------|-------|
| Date                 | Method     | Filename             | DF | Acrolein (ppm) | SEC (ppm) | Formaldehyde (ppm) | SEC (ppm) | Methanol (ppm) | SEC (ppm) | Phenol (ppm) | SEC (ppm) | Propionaldehyde (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) |       |
| 10/10/2013 11:50     | 0913-111_A | 13_10_10_1150_33_060 | 1  | 0.971          | 0.466     | 0.541              | 0.0650    | 0.432          | 0.0970    | 0.88         | 0.44      | 0.234                 | 0.109     | 0.718              | 0.348     |       |
| 10/10/2013 11:51     | 0913-111_A | 13_10_10_1151_33_861 | 1  | 0.987          | 0.510     | 0.328              | 0.0700    | 0.457          | 0.0930    | 0.88         | 0.44      | 0.234                 | 0.113     | 0.904              | 0.373     |       |
| 10/10/2013 11:52     | 0913-111_A | 13_10_10_1152_34_581 | 1  | 0.971          | 0.513     | 0.468              | 0.0710    | 0.466          | 0.0940    | 0.88         | 0.44      | 0.234                 | 0.116     | 0.718              | 0.374     |       |
| 10/10/2013 11:53     | 0913-111_A | 13_10_10_1153_35_331 | 1  | 0.971          | 0.499     | 0.475              | 0.0650    | 0.418          | 0.0970    | 0.88         | 0.44      | 0.234                 | 0.110     | 0.718              | 0.368     |       |
| 10/10/2013 11:54     | 0913-111_A | 13_10_10_1154_36_151 | 1  | 1.30           | 0.467     | 0.511              | 0.0670    | 0.387          | 0.0950    | 0.88         | 0.45      | 0.234                 | 0.112     | 0.718              | 0.348     |       |
| 10/10/2013 11:55     | 0913-111_A | 13_10_10_1155_36_951 | 1  | 1.20           | 0.499     | 0.554              | 0.0710    | 0.435          | 0.0940    | 0.88         | 0.45      | 0.234                 | 0.117     | 0.718              | 0.365     |       |
| 10/10/2013 11:56     | 0913-111_A | 13_10_10_1156_37_691 | 1  | 0.971          | 0.481     | 0.425              | 0.0680    | 0.378          | 0.0910    | 0.88         | 0.45      | 0.234                 | 0.112     | 0.718              | 0.355     |       |
| 10/10/2013 11:57     | 0913-111_A | 13_10_10_1157_38_401 | 1  | 1.41           | 0.466     | 0.527              | 0.0690    | 0.406          | 0.0940    | 0.88         | 0.45      | 0.234                 | 0.114     | 0.718              | 0.346     |       |
| 10/10/2013 11:58     | 0913-111_A | 13_10_10_1158_39_211 | 1  | 1.13           | 0.468     | 0.472              | 0.0710    | 0.432          | 0.0940    | 0.88         | 0.45      | 0.234                 | 0.113     | 0.718              | 0.351     |       |
| 10/10/2013 11:59     | 0913-111_A | 13_10_10_1159_40_021 | 1  | 1.58           | 0.479     | 0.524              | 0.0680    | 0.324          | 0.0900    | 0.88         | 0.44      | 0.234                 | 0.113     | 0.718              | 0.357     |       |
| 10/10/2013 12:00     | 0913-111_A | 13_10_10_1200_40_731 | 1  | 0.971          | 0.485     | 0.472              | 0.0670    | 0.389          | 0.0950    | 0.88         | 0.45      | 0.234                 | 0.112     | 0.718              | 0.359     |       |
| 10/10/2013 12:01     | 0913-111_A | 13_10_10_1201_41_561 | 1  | 1.28           | 0.472     | 0.636              | 0.0700    | 0.357          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.113     | 0.718              | 0.355     |       |
| 10/10/2013 12:02     | 0913-111_A | 13_10_10_1202_42_302 | 1  | 0.971          | 0.473     | 0.612              | 0.0670    | 0.404          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.114     | 0.718              | 0.349     |       |
| 10/10/2013 12:03     | 0913-111_A | 13_10_10_1203_43_022 | 1  | 0.971          | 0.449     | 0.609              | 0.0630    | 0.398          | 0.0900    | 0.88         | 0.44      | 0.234                 | 0.105     | 0.718              | 0.328     |       |
| 10/10/2013 12:04     | 0913-111_A | 13_10_10_1204_43_872 | 1  | 1.01           | 0.489     | 0.509              | 0.0700    | 0.361          | 0.0930    | 0.88         | 0.45      | 0.234                 | 0.116     | 0.718              | 0.364     |       |
| 10/10/2013 12:05     | 0913-111_A | 13_10_10_1205_44_582 | 1  | 0.971          | 0.505     | 0.520              | 0.0700    | 0.401          | 0.0910    | 0.88         | 0.45      | 0.234                 | 0.116     | 0.718              | 0.376     |       |
| 10/10/2013 12:06     | 0913-111_A | 13_10_10_1206_45_332 | 1  | 1.66           | 0.479     | 0.582              | 0.0680    | 0.354          | 0.0930    | 0.88         | 0.44      | 0.234                 | 0.112     | 0.718              | 0.358     |       |
| 10/10/2013 12:07     | 0913-111_A | 13_10_10_1207_46_182 | 1  | 0.971          | 0.478     | 0.498              | 0.0640    | 0.379          | 0.0910    | 0.88         | 0.45      | 0.234                 | 0.112     | 0.718              | 0.358     |       |
| 10/10/2013 12:08     | 0913-111_A | 13_10_10_1208_46_912 | 1  | 1.00           | 0.500     | 0.622              | 0.0670    | 0.438          | 0.0910    | 0.88         | 0.45      | 0.234                 | 0.114     | 0.718              | 0.373     |       |
| 10/10/2013 12:09     | 0913-111_A | 13_10_10_1209_47_682 | 1  | 1.35           | 0.456     | 0.588              | 0.0670    | 0.406          | 0.0910    | 0.88         | 0.45      | 0.234                 | 0.114     | 0.718              | 0.346     |       |
| 10/10/2013 12:10     | 0913-111_A | 13_10_10_1210_48_492 | 1  | 0.971          | 0.533     | 0.475              | 0.0710    | 0.361          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.117     | 0.718              | 0.391     |       |
| 10/10/2013 12:11     | 0913-111_A | 13_10_10_1211_49_202 | 1  | 0.971          | 0.444     | 0.555              | 0.0650    | 0.338          | 0.0930    | 0.88         | 0.44      | 0.234                 | 0.109     | 0.718              | 0.338     |       |
| 10/10/2013 12:12     | 0913-111_A | 13_10_10_1212_50_012 | 1  | 0.971          | 0.500     | 0.555              | 0.0700    | 0.363          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.114     | 0.718              | 0.372     |       |
| 10/10/2013 12:13     | 0913-111_A | 13_10_10_1213_50_712 | 1  | 0.971          | 0.466     | 0.624              | 0.0650    | 0.410          | 0.0940    | 0.88         | 0.44      | 0.234                 | 0.109     | 0.718              | 0.347     |       |
| 10/10/2013 12:14     | 0913-111_A | 13_10_10_1214_51_513 | 1  | 1.36           | 0.450     | 0.604              | 0.0660    | 0.355          | 0.0920    | 0.88         | 0.45      | 0.234                 | 0.108     | 0.718              | 0.334     |       |
| 10/10/2013 12:15     | 0913-111_A | 13_10_10_1215_52_273 | 1  | 0.971          | 0.486     | 0.543              | 0.0720    | 0.420          | 0.0890    | 0.88         | 0.44      | 0.234                 | 0.116     | 0.718              | 0.364     |       |
| 10/10/2013 12:16     | 0913-111_A | 13_10_10_1216_53_003 | 1  | 1.00           | 0.465     | 0.562              | 0.0660    | 0.302          | 0.0900    | 0.88         | 0.44      | 0.234                 | 0.110     | 0.838              | 0.341     |       |
| 10/10/2013 12:17     | 0913-111_A | 13_10_10_1217_53_803 | 1  | 1.42           | 0.480     | 0.562              | 0.0670    | 0.311          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.113     | 0.718              | 0.352     |       |
| 10/10/2013 12:18     | 0913-111_A | 13_10_10_1218_54_503 | 1  | 0.980          | 0.474     | 0.507              | 0.0690    | 0.363          | 0.0890    | 0.88         | 0.44      | 0.234                 | 0.113     | 0.718              | 0.356     |       |
| 10/10/2013 12:19     | 0913-111_A | 13_10_10_1219_55_313 | 1  | 1.41           | 0.480     | 0.565              | 0.0650    | 0.409          | 0.0910    | 0.88         | 0.45      | 0.234                 | 0.110     | 0.718              | 0.359     |       |
| 10/10/2013 12:20     | 0913-111_A | 13_10_10_1220_55_913 | 1  | 0.971          | 0.469     | 0.563              | 0.0690    | 0.363          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.110     | 0.718              | 0.343     |       |
| 10/10/2013 12:21     | 0913-111_A | 13_10_10_1221_56_773 | 1  | 1.09           | 0.439     | 0.556              | 0.0650    | 0.413          | 0.0920    | 0.88         | 0.45      | 0.234                 | 0.109     | 0.718              | 0.319     |       |
| 10/10/2013 12:22     | 0913-111_A | 13_10_10_1222_57_533 | 1  | 1.29           | 0.501     | 0.511              | 0.0680    | 0.345          | 0.0930    | 0.88         | 0.45      | 0.234                 | 0.117     | 0.718              | 0.368     |       |
| 10/10/2013 12:23     | 0913-111_A | 13_10_10_1223_58_253 | 1  | 0.89           | 0.488     | 0.614              | 0.0690    | 0.276          | 0.0900    | 0.88         | 0.45      | 0.234                 | 0.115     | 0.718              | 0.335     |       |
| 10/10/2013 12:24     | 0913-111_A | 13_10_10_1224_59_013 | 1  | 0.971          | 0.467     | 0.561              | 0.0670    | 0.371          | 0.0910    | 0.88         | 0.44      | 0.234                 | 0.109     | 0.718              | 0.348     |       |
| 10/10/2013 12:25     | 0913-111_A | 13_10_10_1225_59_763 | 1  | 0.971          | 0.465     | 0.501              | 0.0670    | 0.404          | 0.0910    | 0.88         | 0.45      | 0.262                 | 0.111     | 0.718              | 0.345     |       |
| 10/10/2013 12:27     | 0913-111_A | 13_10_10_1227_00_544 | 1  | 0.971          | 0.493     | 0.590              | 0.0700    | 0.331          | 0.0920    | 0.88         | 0.45      | 0.234                 | 0.114     | 0.718              | 0.359     |       |
| 10/10/2013 12:28     | 0913-111_A | 13_10_10_1228_01_284 | 1  | 0.971          | 0.488     | 0.598              | 0.0680    | 0.349          | 0.0910    | 0.88         | 0.45      | 0.235                 | 0.114     | 0.718              | 0.367     |       |
| 10/10/2013 12:29     | 0913-111_A | 13_10_10_1229_02_134 | 1  | 1.27           | 0.485     | 0.560              | 0.0650    | 0.346          | 0.0890    | 0.88         | 0.45      | 0.234                 | 0.112     | 0.718              | 0.358     |       |
| 10/10/2013 12:30     | 0913-111_A | 13_10_10_1230_02_884 | 1  | 1.57           | 0.483     | 0.477              | 0.0670    | 0.323          | 0.0910    | 0.88         | 0.45      | 0.234                 | 0.113     | 0.718              | 0.356     |       |
| 10/10/2013 12:31     | 0913-111_A | 13_10_10_1231_03_584 | 1  | 0.971          | 0.457     | 0.589              | 0.0630    | 0.393          | 0.0920    | 0.88         | 0.45      | 0.234                 | 0.107     | 0.718              | 0.336     |       |
| 10/10/2013 12:32     | 0913-111_A | 13_10_10_1232_04_304 | 1  | 0.971          | 0.485     | 0.687              | 0.0690    | 0.350          | 0.0890    | 0.88         | 0.45      | 0.234                 | 0.113     | 0.718              | 0.359     |       |
| 10/10/2013 12:33     | 0913-111_A | 13_10_10_1233_05_164 | 1  | 0.56           | 0.485     | 0.551              | 0.0680    | 0.337          | 0.0900    | 0.88         | 0.45      | 0.234                 | 0.108     | 0.718              | 0.368     |       |
| 10/10/2013 12:34     | 0913-111_A | 13_10_10_1234_05_914 | 1  | 1.02           | 0.480     | 0.648              | 0.0680    | 0.334          | 0.0910    | 0.88         | 0.45      | 0.234                 | 0.116     | 0.718              | 0.365     |       |
| 10/10/2013 12:35     | 0913-111_A | 13_10_10_1235_06_674 | 1  | 0.971          | 0.462     | 0.608              | 0.0660    | 0.357          | 0.0900    | 0.88         | 0.45      | 0.234                 | 0.111     | 0.718              | 0.343     |       |
| 10/10/2013 12:36     | 0913-111_A | 13_10_10_1236_07_474 | 1  | 0.971          | 0.467     | 0.567              | 0.0660    | 0.366          | 0.0900    | 0.88         | 0.45      | 0.263                 | 0.113     | 0.718              | 0.345     |       |
| 10/10/2013 12:37     | 0913-111_A | 13_10_10_1237_08_174 | 1  | 0.971          | 0.473     | 0.542              | 0.0650    | 0.403          | 0.0910    | 0.88         | 0.45      | 0.234                 | 0.112     | 0.718              | 0.345     |       |
| 10/10/2013 12:38     | 0913-111_A | 13_10_10_1238_09_024 | 1  | 0.971          | 0.483     | 0.701              | 0.0690    | 0.414          | 0.0900    | 0.88         | 0.45      | 0.234                 | 0.117     | 0.718              | 0.355     |       |
| 10/10/2013 12:40     | 0913-111_A | 13_10_10_1240_22_660 | 1  | 1.54           | 0.467     | 0.615              | 0.0670    | 0.370          | 0.0890    | 0.88         | 0.45      | 0.349                 | 0.116     | 0.718              | 0.346     |       |
| 10/10/2013 12:41     | 0913-111_A | 13_10_10_1241_23_370 | 1  | 1.50           | 0.503     | 0.599              | 0.0700    | 0.393          | 0.0920    | 0.88         | 0.45      | 0.347                 | 0.117     | 0.718              | 0.374     |       |
| 10/10/2013 12:42     | 0913-111_A | 13_10_10_1242_24_140 | 1  | 1.83           | 0.489     | 0.510              | 0.0690    | 0.329          | 0.0890    | 0.88         | 0.44      | 0.279                 | 0.119     | 0.718              | 0.364     |       |
| 10/10/2013 12:43     | 0913-111_A | 13_10_10_1243_24_950 | 1  | 1.61           | 0.487     | 0.520              | 0.0690    | 0.338          | 0.0910    | 0.88         | 0.44      | 0.354                 | 0.119     | 0.718              | 0.358     |       |
| 10/10/2013 12:44     | 0913-111_A | 13_10_10_1244_25_070 | 1  | 1.08           | 0.461     | 0.560              | 0.0680    | 0.372          | 0.0910    | 0.88         | 0.45      | 0.358                 | 0.113     | 0.718              | 0.339     |       |
| 10/10/2013 12:45     | 0913-111_A | 13_10_10_1245_26_440 | 1  | 1.33           | 0.461     | 0.596              | 0.0680    | 0.332          | 0.0880    | 0.88         | 0.45      | 0.349                 | 0.117     | 0.718              | 0.343     |       |
| 10/10/2013 12:46     | 0913-111_A | 13_10_10_1246_27_150 | 1  | 0.971          | 0.479     | 0.592              | 0.0670    | 0.330          | 0.0900    | 0.88         | 0.44      | 0.234                 | 0.113     | 0.718              | 0.354     |       |
| 10/10/2013 12:47     | 0913-111_A | 13_10_10_1247_27_970 | 1  | 1.06           | 0.483     | 0.718              | 0.0640    | 0.390          | 0.0880    | 0.88         | 0.45      | 0.291                 | 0.111     | 0.718              | 0.354     |       |
| 10/10/2013 12:48     | 0913-111_A | 13_10_10_1248_28_730 | 1  | 0.971          | 0.489     | 0.559              | 0.0700    | 0.385          | 0.0920    | 0.88         | 0.45      | 0.234                 | 0.119     | 0.718              | 0.368     |       |
| 10/10/2013 12:49     | 0913-111_A | 13_10_10_1249_29_530 | 1  | 0.971          | 0.522     | 0.687              | 0.0710    | 0.345          | 0.0900    | 0.88         | 0.44      | 0.368                 | 0.121     | 0.718              | 0.388     |       |
| 10/10/2013 12:50     | 0913-111_A | 13_10_10_1250_30_250 | 1  | 1.09           | 0.475     | 0.612              | 0.0670    | 0.353          | 0.0880    | 0.88         | 0.45      | 0.234                 | 0.114     | 0.718              | 0.360     |       |
| Average Conc. (ppm): |            |                      |    | 1              | 1.15      | 0.480              | 0.561     | 0.0677         | 0.376     | 0.0913       | 0.88      | 0.45                  | 0.251     | 0.113              | 0.723     | 0.355 |

| Dryer 1 Run 1            |            |                      |    |                |           |                    |           |                |           |              |           |                       |           |                    |           |       |
|--------------------------|------------|----------------------|----|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|-----------|-----------------------|-----------|--------------------|-----------|-------|
| Date                     | Method     | Filename             | DF | Acrolein (ppm) | SEC (ppm) | Formaldehyde (ppm) | SEC (ppm) | Methanol (ppm) | SEC (ppm) | Phenol (ppm) | SEC (ppm) | Propionaldehyde (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) |       |
| 10/10/2013 17:38         | 0913-111_A | 13_10_10_1738_19_855 | 1  | 1.87           | 0.969     | 5.41               | 0.145     | 3.36           | 0.311     | 2.04         | 0.94      | 1.36                  | 0.253     | 1.27               | 0.711     |       |
| 10/10/2013 17:39         | 0913-111_A | 13_10_10_1739_20_875 | 1  | 2.01           | 0.979     | 5.39               | 0.142     | 3.31           | 0.309     | 2.04         | 0.92      | 1.36                  | 0.258     | 1.27               | 0.725     |       |
| 10/10/2013 17:40         | 0913-111_A | 13_10_10_1740_21_895 | 1  | 1.72           | 0.944     | 5.40               | 0.141     | 3.31           | 0.314     | 2.04         | 0.92      | 1.38                  | 0.259     | 1.27               | 0.703     |       |
| 10/10/2013 17:42         | 0913-111_A | 13_10_10_1742_34_100 | 1  | 2.10           | 0.963     | 5.60               | 0.146     | 3.32           | 0.313     | 2.04         | 0.88      | 1.13                  | 0.259     | 1.27               | 0.712     |       |
| 10/10/2013 17:43         | 0913-111_A | 13_10_10_1743_34_860 | 1  | 2.27           | 0.976     | 5.77               | 0.148     | 3.46           | 0.328     | 2.04         | 0.88      | 1.02                  | 0.267     | 1.27               | 0.719     |       |
| 10/10/2013 17:44         | 0913-111_A | 13_10_10_1744_35_610 | 1  | 1.72           | 0.988     | 6.15               | 0.148     | 3.65           | 0.326     | 2.04         | 0.85      | 1.24                  | 0.264     | 1.27               | 0.725     |       |
| 10/10/2013 17:45         | 0913-111_A | 13_10_10_1745_36_447 | 1  | 0.999          | 0.79      | 6.80               | 0.130     | 3.46           | 0.332     | 2.04         | 0.85      | 1.25                  | 0.265     | 1.27               | 0.738     |       |
| 10/10/2013 17:46         | 0913-111_A | 13_10_10_1746_37_220 | 1  | 1.95           | 1.01      | 6.74               | 0.151     | 3.88           | 0.330     | 2.04         | 0.85      | 1.16                  | 0.269     | 1.27               | 0.735     |       |
| 10/10/2013 17:47         | 0913-111_A | 13_10_10_1747_37_980 | 1  | 2.68           | 0.984     | 6.60               | 0.147     | 3.84           | 0.323     | 2.04         | 0.87      | 1.21                  | 0.267     | 1.27               | 0.728     |       |
| 10/10/2013 17:48         | 0913-111_A | 13_10_10_1748_38_380 | 1  | 1.78           | 0.985     | 6.70               | 0.152     | 3.85           | 0.319     | 2.04         | 0.88      | 1.22                  | 0.268     | 1.27               | 0.724     |       |
| 10/10/2013 17:49         | 0913-111_A | 13_10_10_1749_39_450 | 1  | 2.02           | 1.00      | 6.10               | 0.147     | 3.67           | 0.317     | 2.04         | 0.88      | 1.23                  | 0.268     | 1.27               | 0.730     |       |
| 10/10/2013 17:50         | 0913-111_A | 13_10_10_1750_40_260 | 1  | 2.05           | 0.960     | 5.27               | 0.139     | 3.31           | 0.307     | 2.04         | 0.90      | 0.847                 | 0.252     | 1.27               | 0.707     |       |
| 10/10/2013 17:51         | 0913-111_A | 13_10_10_1751_41_070 | 1  | 1.72           | 0.956     | 4.78               | 0.135     | 3.07           | 0.307     | 2.04         | 0.91      | 0.728                 | 0.251     | 1.27               | 0.702     |       |
| 10/10/2013 17:52         | 0913-111_A | 13_10_10_1752_41_790 | 1  | 1.72           | 0.987     | 4.48               | 0.137     | 2.94           | 0.306     | 2.04         | 0.93      | 0.560                 | 0.250     | 1.27               | 0.709     |       |
| 10/10/2013 17:53         | 0913-111_A | 13_10_10_1753_42_537 | 1  | 0.951          | 0.90      | 3.97               | 0.131     | 2.81           | 0.301     | 2.04         | 0.94      | 0.253                 | 0.249     | 1.27               | 0.704     |       |
| 10/10/2013 17:54         | 0913-111_A | 13_10_10_1754_43_251 | 1  | 1.72           | 0.943     | 3.70               | 0.135     | 2.69           | 0.297     | 2.04         | 0.96      | 0.452                 | 0.250     | 1.27               | 0.696     |       |
| 10/10/2013 17:55         | 0913-111_A | 13_10_10_1755_44_091 | 1  | 1.79           | 0.903     | 3.57               | 0.135     | 2.58           | 0.294     | 2.04         | 0.96      | 0.452                 | 0.246     | 1.27               | 0.665     |       |
| 10/10/2013 17:56         | 0913-111_A | 13_10_10_1756_44_841 | 1  | 1.72           | 0.961     | 3.29               | 0.135     | 2.45           | 0.293     | 2.04         | 0.98      | 0.452                 | 0.247     | 1.27               | 0.712     |       |
| 10/10/2013 17:57         | 0913-111_A | 13_10_10_1757_45_581 | 1  | 2.09           | 0.903     | 2.90               | 0.130     | 2.46           | 0.290     | 2.04         | 0.97      | 0.452                 | 0.237     | 1.27               | 0.674     |       |
| 10/10/2013 17:58         | 0913-111_A | 13_10_10_1758_46_391 | 1  | 1.72           | 0.909     | 2.91               | 0.132     | 2.41           | 0.289     | 2.04         | 1.01      | 0.452                 | 0.243     | 1.27               | 0.680     |       |
| 10/10/2013 17:59         | 0913-111_A | 13_10_10_1759_47_171 | 1  | 1.72           | 0.908     | 2.72               | 0.131     | 2.21           | 0.286     | 2.04         | 1.01      | 0.452                 | 0.239     | 1.27               | 0.670     |       |
| 10/10/2013 18:00         | 0913-111_A | 13_10_10_1800_47_881 | 1  | 1.72           | 0.931     | 2.52               | 0.129     | 2.28           | 0.281     | 2.04         | 1.04      | 0.452                 | 0.241     | 1.27               | 0.698     |       |
| 10/10/2013 18:01         | 0913-111_A | 13_10_10_1801_48_561 | 1  | 1.72           | 0.903     | 2.45               | 0.129     | 2.24           | 0.277     | 2.04         | 1.04      | 0.452                 | 0.240     | 1.27               | 0.672     |       |
| 10/10/2013 18:02         | 0913-111_A | 13_10_10_1802_49_251 | 1  | 0.919          | 0.705     | 2.12               | 0.129     | 2.05           | 0.272     | 2.04         | 1.06      | 0.452                 | 0.236     | 1.27               | 0.688     |       |
| 10/10/2013 18:03         | 0913-111_A | 13_10_10_1803_50_191 | 1  | 1.72           | 0.862     | 2.18               | 0.123     | 1.96           | 0.277     | 2.04         | 1.07      | 0.452                 | 0.228     | 1.27               | 0.644     |       |
| 10/10/2013 18:04         | 0913-111_A | 13_10_10_1804_51_001 | 1  | 1.72           | 0.856     | 2.04               | 0.120     | 2.08           | 0.282     | 2.04         | 1.07      | 0.452                 | 0.224     | 1.27               | 0.638     |       |
| 10/10/2013 18:05         | 0913-111_A | 13_10_10_1805_51_732 | 1  | 1.72           | 0.905     | 2.12               | 0.126     | 2.08           | 0.291     | 2.04         | 1.06      | 0.452                 | 0.232     | 1.27               | 0.664     |       |
| 10/10/2013 18:06         | 0913-111_A | 13_10_10_1806_52_447 | 1  | 1.72           | 0.912     | 2.33               | 0.128     | 2.27           | 0.293     | 2.04         | 1.07      | 0.452                 | 0.232     | 1.27               | 0.672     |       |
| 10/10/2013 18:07         | 0913-111_A | 13_10_10_1807_53_242 | 1  | 1.72           | 0.901     | 2.55               | 0.127     | 2.22           | 0.292     | 2.04         | 1.02      | 0.452                 | 0.230     | 1.27               | 0.666     |       |
| 10/10/2013 18:08         | 0913-111_A | 13_10_10_1808_53_952 | 1  | 1.72           | 0.938     | 2.54               | 0.128     | 2.23           | 0.298     | 2.04         | 1.02      | 0.452                 | 0.242     | 1.27               | 0.691     |       |
| 10/10/2013 18:09         | 0913-111_A | 13_10_10_1809_54_762 | 1  | 1.72           | 0.943     | 2.46               | 0.125     | 2.25           | 0.297     | 2.04         | 1.02      | 0.452                 | 0.238     | 1.27               | 0.708     |       |
| 10/10/2013 18:10         | 0913-111_A | 13_10_10_1810_55_572 | 1  | 1.72           | 0.901     | 2.54               | 0.129     | 2.16           | 0.300     | 2.04         | 1.04      | 0.452                 | 0.238     | 1.27               | 0.672     |       |
| 10/10/2013 18:11         | 0913-111_A | 13_10_10_1811_56_282 | 1  | 1.72           | 0.879     | 2.86               | 0.124     | 2.40           | 0.306     | 2.04         | 1.00      | 0.452                 | 0.228     | 1.27               | 0.654     |       |
| 10/10/2013 18:12         | 0913-111_A | 13_10_10_1812_57_092 | 1  | 1.72           | 0.930     | 3.03               | 0.129     | 2.62           | 0.310     | 2.04         | 0.99      | 0.452                 | 0.238     | 1.27               | 0.690     |       |
| 10/10/2013 18:13         | 0913-111_A | 13_10_10_1813_57_812 | 1  | 1.72           | 0.947     | 3.21               | 0.130     | 2.56           | 0.307     | 2.04         | 0.98      | 0.452                 | 0.240     | 1.27               | 0.703     |       |
| 10/10/2013 18:14         | 0913-111_A | 13_10_10_1814_58_523 | 1  | 1.72           | 0.927     | 3.36               | 0.128     | 2.53           | 0.322     | 2.04         | 0.97      | 0.452                 | 0.237     | 1.27               | 0.684     |       |
| 10/10/2013 18:15         | 0913-111_A | 13_10_10_1815_59_382 | 1  | 1.72           | 0.927     | 3.14               | 0.129     | 2.69           | 0.302     | 2.04         | 0.97      | 0.452                 | 0.237     | 1.27               | 0.685     |       |
| 10/10/2013 18:17         | 0913-111_A | 13_10_10_1817_00_093 | 1  | 1.86           | 0.926     | 2.95               | 0.129     | 2.59           | 0.293     | 2.04         | 0.96      | 0.452                 | 0.238     | 1.27               | 0.697     |       |
| 10/10/2013 18:18         | 0913-111_A | 13_10_10_1818_00_713 | 1  | 1.72           | 0.924     | 3.03               | 0.129     | 2.49           | 0.296     | 2.04         | 0.99      | 0.452                 | 0.235     | 1.27               | 0.684     |       |
| 10/10/2013 18:19         | 0913-111_A | 13_10_10_1819_01_513 | 1  | 1.72           | 0.891     | 2.77               | 0.129     | 2.19           | 0.284     | 2.04         | 1.00      | 0.452                 | 0.238     | 1.27               | 0.660     |       |
| 10/10/2013 18:20         | 0913-111_A | 13_10_10_1820_02_313 | 1  | 1.72           | 0.906     | 2.49               | 0.128     | 2.20           | 0.284     | 2.04         | 1.02      | 0.452                 | 0.229     | 1.27               | 0.671     |       |
| 10/10/2013 18:21         | 0913-111_A | 13_10_10_1821_03_043 | 1  | 1.72           | 0.903     | 2.25               | 0.127     | 2.16           | 0.283     | 2.04         | 1.05      | 0.452                 | 0.231     | 1.27               | 0.667     |       |
| 10/10/2013 18:22         | 0913-111_A | 13_10_10_1822_03_843 | 1  | 1.72           | 0.878     | 2.31               | 0.123     | 2.08           | 0.284     | 2.04         | 1.07      | 0.452                 | 0.225     | 1.27               | 0.653     |       |
| 10/10/2013 18:23         | 0913-111_A | 13_10_10_1823_04_563 | 1  | 1.72           | 0.881     | 2.38               | 0.127     | 2.25           | 0.286     | 2.04         | 1.12      | 0.452                 | 0.228     | 1.27               | 0.668     |       |
| 10/10/2013 18:24         | 0913-111_A | 13_10_10_1824_05_383 | 1  | 1.72           | 0.873     | 2.37               | 0.122     | 2.15           | 0.291     | 2.04         | 1.10      | 0.452                 | 0.225     | 1.27               | 0.642     |       |
| 10/10/2013 18:25         | 0913-111_A | 13_10_10_1825_06_133 | 1  | 1.72           | 0.877     | 2.31               | 0.125     | 2.13           | 0.292     | 2.04         | 1.10      | 0.452                 | 0.224     | 1.27               | 0.652     |       |
| 10/10/2013 18:26         | 0913-111_A | 13_10_10_1826_06_873 | 1  | 1.72           | 0.916     | 2.29               | 0.127     | 2.12           | 0.288     | 2.04         | 1.10      | 0.452                 | 0.230     | 1.27               | 0.683     |       |
| 10/10/2013 18:27         | 0913-111_A | 13_10_10_1827_07_693 | 1  | 1.72           | 0.857     | 2.23               | 0.127     | 2.08           | 0.287     | 2.04         | 1.12      | 0.452                 | 0.232     | 1.27               | 0.657     |       |
| 10/10/2013 18:28         | 0913-111_A | 13_10_10_1828_08_403 | 1  | 1.72           | 0.869     | 2.36               | 0.123     | 2.11           | 0.288     | 2.04         | 1.06      | 0.462                 | 0.224     | 1.27               | 0.642     |       |
| 10/10/2013 18:29         | 0913-111_A | 13_10_10_1829_09_244 | 1  | 1.72           | 0.846     | 2.51               | 0.125     | 2.24           | 0.288     | 2.04         | 1.06      | 0.489                 | 0.223     | 1.27               | 0.627     |       |
| 10/10/2013 18:30         | 0913-111_A | 13_10_10_1830_09_954 | 1  | 1.72           | 0.883     | 2.29               | 0.126     | 2.21           | 0.280     | 2.04         | 1.01      | 0.575                 | 0.227     | 1.27               | 0.657     |       |
| 10/10/2013 18:31         | 0913-111_A | 13_10_10_1831_10_774 | 1  | 1.72           | 0.867     | 2.27               | 0.127     | 2.12           | 0.277     | 2.04         | 1.07      | 0.500                 | 0.227     | 1.27               | 0.641     |       |
| 10/10/2013 18:32         | 0913-111_A | 13_10_10_1832_11_454 | 1  | 1.72           | 0.855     | 2.07               | 0.120     | 1.92           | 0.281     | 2.04         | 1.10      | 0.719                 | 0.221     | 1.27               | 0.635     |       |
| 10/10/2013 18:33         | 0913-111_A | 13_10_10_1833_12_274 | 1  | 1.72           | 0.872     | 2.11               | 0.122     | 1.96           | 0.284     | 2.04         | 1.11      | 0.732                 | 0.222     | 1.27               | 0.639     |       |
| 10/10/2013 18:34         | 0913-111_A | 13_10_10_1834_13_034 | 1  | 1.72           | 0.874     | 2.08               | 0.118     | 1.88           | 0.283     | 2.04         | 1.13      | 0.748                 | 0.220     | 1.27               | 0.642     |       |
| 10/10/2013 18:35         | 0913-111_A | 13_10_10_1835_13_864 | 1  | 1.72           | 0.878     | 1.90               | 0.124     | 1.82           | 0.285     | 2.04         | 1.12      | 0.764                 | 0.219     | 1.27               | 0.656     |       |
| 10/10/2013 18:36         | 0913-111_A | 13_10_10_1836_14_564 | 1  | 1.72           | 0.875     | 1.73               | 0.128     | 1.74           | 0.280     | 2.04         | 1.10      | 0.717                 | 0.230     | 1.27               | 0.657     |       |
| 10/10/2013 18:37         | 0913-111_A | 13_10_10_1837_15_364 | 1  | 1.72           | 0.852     | 1.71               | 0.124     | 1.63           | 0.275     | 2.04         | 1.11      | 0.735                 | 0.221     | 1.27               | 0.630     |       |
| 10/10/2013 18:38         | 0913-111_A | 13_10_10_1838_16_164 | 1  | 1.72           | 0.839     | 1.76               | 0.118     | 1.67           | 0.280     | 2.04         | 1.13      | 0.806                 | 0.216     | 1.27               | 0.622     |       |
| Average Conc. Compounds: |            |                      |    | 1              | 1.79      | 0.917              | 3.32      | 0.131          | 2.52      | 0.296        | 2.04      | 1.10                  | 0.644     | 0.239              | 1.27      | 0.679 |

|                  |                |
|------------------|----------------|
| Company          | ACT            |
| Analyst Initials | CJT            |
| Parameters       | EPA Method 320 |
| # Samples        | 21 Runs        |

|             |                      |
|-------------|----------------------|
| Client #    | 1911                 |
| Job #       | 0913-111             |
| PO #        | 3134 1911            |
| Report Date | V0.62 13.10.18.12.58 |

| Dryer 1 Run 2        |            |                      |    |                |           |                    |           |                |           |              |           |                       |           |                    |           |       |
|----------------------|------------|----------------------|----|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|-----------|-----------------------|-----------|--------------------|-----------|-------|
| Date                 | Method     | Filename             | DF | Acrolein (ppm) | SEC (ppm) | Formaldehyde (ppm) | SEC (ppm) | Methanol (ppm) | SEC (ppm) | Phenol (ppm) | SEC (ppm) | Propionaldehyde (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) |       |
| 10/11/2013 10:00     | 0913-111_A | 13_10_11_1000_40_402 | 1  | 1.72           | 0.860     | 1.57               | 0.121     | 1.50           | 0.297     | 2.04         | 1.20      | 0.672                 | 0.219     | 1.27               | 0.636     |       |
| 10/11/2013 10:01     | 0913-111_A | 13_10_11_1001_41_122 | 1  | 1.72           | 0.811     | 1.50               | 0.116     | 1.53           | 0.301     | 2.04         | 1.18      | 0.500                 | 0.215     | 1.27               | 0.595     |       |
| 10/11/2013 10:02     | 0913-111_A | 13_10_11_1002_41_912 | 1  | 1.72           | 0.841     | 1.40               | 0.126     | 1.50           | 0.297     | 2.04         | 1.16      | 0.684                 | 0.224     | 1.27               | 0.624     |       |
| 10/11/2013 10:03     | 0913-111_A | 13_10_11_1003_42_642 | 1  | 1.72           | 0.846     | 1.51               | 0.128     | 1.64           | 0.306     | 2.04         | 1.13      | 0.624                 | 0.224     | 1.27               | 0.623     |       |
| 10/11/2013 10:04     | 0913-111_A | 13_10_11_1004_43_352 | 1  | 1.72           | 0.853     | 1.56               | 0.129     | 1.59           | 0.301     | 2.04         | 1.12      | 0.550                 | 0.227     | 1.27               | 0.633     |       |
| 10/11/2013 10:05     | 0913-111_A | 13_10_11_1005_44_132 | 1  | 1.72           | 0.825     | 1.53               | 0.122     | 1.52           | 0.297     | 2.04         | 1.10      | 0.513                 | 0.219     | 1.27               | 0.603     |       |
| 10/11/2013 10:06     | 0913-111_A | 13_10_11_1006_44_842 | 1  | 1.72           | 0.870     | 1.47               | 0.127     | 1.59           | 0.298     | 2.04         | 1.10      | 0.547                 | 0.226     | 1.27               | 0.640     |       |
| 10/11/2013 10:07     | 0913-111_A | 13_10_11_1007_45_652 | 1  | 1.72           | 0.847     | 1.43               | 0.123     | 1.58           | 0.300     | 2.04         | 1.10      | 0.452                 | 0.223     | 1.27               | 0.624     |       |
| 10/11/2013 10:08     | 0913-111_A | 13_10_11_1008_46_362 | 1  | 1.72           | 0.863     | 1.51               | 0.125     | 1.63           | 0.299     | 2.04         | 1.09      | 0.698                 | 0.225     | 1.27               | 0.635     |       |
| 10/11/2013 10:09     | 0913-111_A | 13_10_11_1009_47_132 | 1  | 1.72           | 0.883     | 1.42               | 0.127     | 1.63           | 0.292     | 2.04         | 1.08      | 0.688                 | 0.225     | 1.27               | 0.646     |       |
| 10/11/2013 10:10     | 0913-111_A | 13_10_11_1010_47_862 | 1  | 1.72           | 0.846     | 1.33               | 0.128     | 1.58           | 0.291     | 2.04         | 1.08      | 0.609                 | 0.227     | 1.27               | 0.623     |       |
| 10/11/2013 10:11     | 0913-111_A | 13_10_11_1011_48_603 | 1  | 1.72           | 0.850     | 1.50               | 0.124     | 1.66           | 0.290     | 2.04         | 1.06      | 0.644                 | 0.224     | 1.27               | 0.631     |       |
| 10/11/2013 10:12     | 0913-111_A | 13_10_11_1012_49_403 | 1  | 1.72           | 0.856     | 1.43               | 0.125     | 1.59           | 0.283     | 2.04         | 1.08      | 0.489                 | 0.222     | 1.27               | 0.629     |       |
| 10/11/2013 10:13     | 0913-111_A | 13_10_11_1013_50_133 | 1  | 1.72           | 0.854     | 1.48               | 0.128     | 1.61           | 0.291     | 2.04         | 1.09      | 0.613                 | 0.226     | 1.27               | 0.632     |       |
| 10/11/2013 10:14     | 0913-111_A | 13_10_11_1014_50_943 | 1  | 1.72           | 0.860     | 1.46               | 0.122     | 1.60           | 0.290     | 2.04         | 1.09      | 0.548                 | 0.221     | 1.27               | 0.643     |       |
| 10/11/2013 10:15     | 0913-111_A | 13_10_11_1015_51_633 | 1  | 1.72           | 0.869     | 1.44               | 0.126     | 1.61           | 0.285     | 2.04         | 1.09      | 0.576                 | 0.228     | 1.27               | 0.642     |       |
| 10/11/2013 10:16     | 0913-111_A | 13_10_11_1016_52_393 | 1  | 1.72           | 0.847     | 1.46               | 0.123     | 1.70           | 0.286     | 2.04         | 1.08      | 0.639                 | 0.222     | 1.27               | 0.629     |       |
| 10/11/2013 10:17     | 0913-111_A | 13_10_11_1017_53_133 | 1  | 1.72           | 0.852     | 1.52               | 0.127     | 1.64           | 0.282     | 2.04         | 1.08      | 0.710                 | 0.226     | 1.27               | 0.631     |       |
| 10/11/2013 10:18     | 0913-111_A | 13_10_11_1018_53_883 | 1  | 1.72           | 0.862     | 1.24               | 0.129     | 1.62           | 0.282     | 2.04         | 1.09      | 0.649                 | 0.227     | 1.27               | 0.639     |       |
| 10/11/2013 10:19     | 0913-111_A | 13_10_11_1019_54_693 | 1  | 1.72           | 0.814     | 1.44               | 0.125     | 1.61           | 0.280     | 2.04         | 1.07      | 0.667                 | 0.222     | 1.27               | 0.606     |       |
| 10/11/2013 10:20     | 0913-111_A | 13_10_11_1020_55_363 | 1  | 1.72           | 0.861     | 1.26               | 0.123     | 1.58           | 0.281     | 2.04         | 1.07      | 0.452                 | 0.222     | 1.27               | 0.636     |       |
| 10/11/2013 10:21     | 0913-111_A | 13_10_11_1021_56_083 | 1  | 1.72           | 0.843     | 1.35               | 0.128     | 1.56           | 0.281     | 2.04         | 1.07      | 0.537                 | 0.227     | 1.27               | 0.627     |       |
| 10/11/2013 10:22     | 0913-111_A | 13_10_11_1022_56_793 | 1  | 1.72           | 0.826     | 1.47               | 0.123     | 1.54           | 0.282     | 2.04         | 1.07      | 0.517                 | 0.218     | 1.27               | 0.606     |       |
| 10/11/2013 10:23     | 0913-111_A | 13_10_11_1023_57_534 | 1  | 1.72           | 0.867     | 1.48               | 0.126     | 1.57           | 0.293     | 2.04         | 1.08      | 0.561                 | 0.223     | 1.27               | 0.640     |       |
| 10/11/2013 10:24     | 0913-111_A | 13_10_11_1024_58_294 | 1  | 1.72           | 0.851     | 1.40               | 0.128     | 1.59           | 0.287     | 2.04         | 1.07      | 0.623                 | 0.222     | 1.27               | 0.636     |       |
| 10/11/2013 10:25     | 0913-111_A | 13_10_11_1025_58_974 | 1  | 1.72           | 0.867     | 1.50               | 0.122     | 1.61           | 0.286     | 2.04         | 1.05      | 0.599                 | 0.226     | 1.27               | 0.635     |       |
| 10/11/2013 10:26     | 0913-111_A | 13_10_11_1026_59_734 | 1  | 1.72           | 0.829     | 1.63               | 0.122     | 1.56           | 0.292     | 2.04         | 1.06      | 0.692                 | 0.219     | 1.27               | 0.601     |       |
| 10/11/2013 10:28     | 0913-111_A | 13_10_11_1028_60_474 | 1  | 1.72           | 0.844     | 1.58               | 0.129     | 1.69           | 0.289     | 2.04         | 1.05      | 0.636                 | 0.222     | 1.27               | 0.631     |       |
| 10/11/2013 10:29     | 0913-111_A | 13_10_11_1029_61_274 | 1  | 1.72           | 0.862     | 1.71               | 0.127     | 1.71           | 0.294     | 2.04         | 1.07      | 0.704                 | 0.227     | 1.27               | 0.633     |       |
| 10/11/2013 10:30     | 0913-111_A | 13_10_11_1030_61_984 | 1  | 1.72           | 0.829     | 1.44               | 0.123     | 1.64           | 0.288     | 2.04         | 1.07      | 0.523                 | 0.220     | 1.27               | 0.610     |       |
| 10/11/2013 10:31     | 0913-111_A | 13_10_11_1031_62_734 | 1  | 1.72           | 0.822     | 1.46               | 0.124     | 1.51           | 0.282     | 2.04         | 1.08      | 0.749                 | 0.219     | 1.27               | 0.611     |       |
| 10/11/2013 10:32     | 0913-111_A | 13_10_11_1032_63_544 | 1  | 1.72           | 0.860     | 1.47               | 0.125     | 1.58           | 0.284     | 2.04         | 1.08      | 0.701                 | 0.225     | 1.27               | 0.638     |       |
| 10/11/2013 10:33     | 0913-111_A | 13_10_11_1033_64_294 | 1  | 1.72           | 0.853     | 1.42               | 0.126     | 1.61           | 0.286     | 2.04         | 1.06      | 0.721                 | 0.224     | 1.27               | 0.628     |       |
| 10/11/2013 10:34     | 0913-111_A | 13_10_11_1034_65_054 | 1  | 1.72           | 0.848     | 1.48               | 0.125     | 1.58           | 0.285     | 2.04         | 1.07      | 0.542                 | 0.223     | 1.27               | 0.631     |       |
| 10/11/2013 10:35     | 0913-111_A | 13_10_11_1035_65_724 | 1  | 1.72           | 0.859     | 1.62               | 0.130     | 1.69           | 0.289     | 2.04         | 1.06      | 0.719                 | 0.231     | 1.27               | 0.633     |       |
| 10/11/2013 10:36     | 0913-111_A | 13_10_11_1036_66_535 | 1  | 1.72           | 0.865     | 1.55               | 0.128     | 1.68           | 0.290     | 2.04         | 1.06      | 0.686                 | 0.230     | 1.27               | 0.637     |       |
| 10/11/2013 10:37     | 0913-111_A | 13_10_11_1037_67_285 | 1  | 1.72           | 0.851     | 1.47               | 0.127     | 1.57           | 0.295     | 2.04         | 1.06      | 0.740                 | 0.227     | 1.27               | 0.631     |       |
| 10/11/2013 10:38     | 0913-111_A | 13_10_11_1038_67_965 | 1  | 1.72           | 0.833     | 1.59               | 0.127     | 1.72           | 0.293     | 2.04         | 1.05      | 0.693                 | 0.225     | 1.27               | 0.613     |       |
| 10/11/2013 10:39     | 0913-111_A | 13_10_11_1039_68_675 | 1  | 1.72           | 0.842     | 1.59               | 0.127     | 1.67           | 0.294     | 2.04         | 1.05      | 0.712                 | 0.226     | 1.27               | 0.624     |       |
| 10/11/2013 10:40     | 0913-111_A | 13_10_11_1040_69_475 | 1  | 1.72           | 0.836     | 1.56               | 0.129     | 1.75           | 0.292     | 2.04         | 1.06      | 0.752                 | 0.231     | 1.27               | 0.620     |       |
| 10/11/2013 10:41     | 0913-111_A | 13_10_11_1041_70_245 | 1  | 1.72           | 0.861     | 1.58               | 0.129     | 1.70           | 0.294     | 2.04         | 1.05      | 0.773                 | 0.225     | 1.27               | 0.631     |       |
| 10/11/2013 10:42     | 0913-111_A | 13_10_11_1042_71_005 | 1  | 1.72           | 0.846     | 1.25               | 0.124     | 1.74           | 0.293     | 2.04         | 1.05      | 0.693                 | 0.227     | 1.27               | 0.630     |       |
| 10/11/2013 10:43     | 0913-111_A | 13_10_11_1043_71_705 | 1  | 1.72           | 0.870     | 1.69               | 0.127     | 1.76           | 0.295     | 2.04         | 1.06      | 0.766                 | 0.228     | 1.27               | 0.637     |       |
| 10/11/2013 10:44     | 0913-111_A | 13_10_11_1044_72_415 | 1  | 1.72           | 0.843     | 1.52               | 0.123     | 1.63           | 0.287     | 2.04         | 1.08      | 0.744                 | 0.225     | 1.27               | 0.617     |       |
| 10/11/2013 10:45     | 0913-111_A | 13_10_11_1045_73_215 | 1  | 1.72           | 0.831     | 1.49               | 0.127     | 1.65           | 0.288     | 2.04         | 1.07      | 0.754                 | 0.224     | 1.27               | 0.614     |       |
| 10/11/2013 10:46     | 0913-111_A | 13_10_11_1046_73_925 | 1  | 1.72           | 0.838     | 1.57               | 0.126     | 1.69           | 0.291     | 2.04         | 1.05      | 0.694                 | 0.223     | 1.27               | 0.627     |       |
| 10/11/2013 10:47     | 0913-111_A | 13_10_11_1047_74_755 | 1  | 1.72           | 0.847     | 1.54               | 0.127     | 1.70           | 0.294     | 2.04         | 1.06      | 0.531                 | 0.227     | 1.27               | 0.624     |       |
| 10/11/2013 10:48     | 0913-111_A | 13_10_11_1048_75_466 | 1  | 1.72           | 0.838     | 1.62               | 0.124     | 1.88           | 0.298     | 2.04         | 1.03      | 0.851                 | 0.231     | 1.27               | 0.621     |       |
| 10/11/2013 10:49     | 0913-111_A | 13_10_11_1049_76_246 | 1  | 1.72           | 0.878     | 1.69               | 0.128     | 1.78           | 0.301     | 2.04         | 1.01      | 0.949                 | 0.237     | 1.27               | 0.650     |       |
| 10/11/2013 10:50     | 0913-111_A | 13_10_11_1050_76_906 | 1  | 1.72           | 0.890     | 2.24               | 0.131     | 2.08           | 0.319     | 2.04         | 0.98      | 0.875                 | 0.238     | 1.27               | 0.658     |       |
| 10/11/2013 10:51     | 0913-111_A | 13_10_11_1051_77_706 | 1  | 1.72           | 0.900     | 2.70               | 0.131     | 2.33           | 0.320     | 2.04         | 0.97      | 1.12                  | 0.241     | 1.27               | 0.668     |       |
| 10/11/2013 10:52     | 0913-111_A | 13_10_11_1052_78_466 | 1  | 1.72           | 0.861     | 2.71               | 0.133     | 2.31           | 0.318     | 2.04         | 0.97      | 1.25                  | 0.245     | 1.27               | 0.642     |       |
| 10/11/2013 10:53     | 0913-111_A | 13_10_11_1053_79_216 | 1  | 1.72           | 0.863     | 2.31               | 0.132     | 2.16           | 0.310     | 2.04         | 0.99      | 1.13                  | 0.241     | 1.27               | 0.637     |       |
| 10/11/2013 10:54     | 0913-111_A | 13_10_11_1054_79_966 | 1  | 1.72           | 0.855     | 2.12               | 0.129     | 2.11           | 0.303     | 2.04         | 1.01      | 1.17                  | 0.237     | 1.27               | 0.634     |       |
| 10/11/2013 10:55     | 0913-111_A | 13_10_11_1055_80_716 | 1  | 1.72           | 0.871     | 1.93               | 0.127     | 2.00           | 0.299     | 2.04         | 1.03      | 1.10                  | 0.235     | 1.27               | 0.641     |       |
| 10/11/2013 10:56     | 0913-111_A | 13_10_11_1056_81_466 | 1  | 1.72           | 0.856     | 1.82               | 0.126     | 1.96           | 0.296     | 2.04         | 1.02      | 1.00                  | 0.232     | 1.27               | 0.637     |       |
| 10/11/2013 10:57     | 0913-111_A | 13_10_11_1057_82_216 | 1  | 1.72           | 0.846     | 1.81               | 0.131     | 1.87           | 0.299     | 2.04         | 1.03      | 0.795                 | 0.238     | 1.27               | 0.624     |       |
| 10/11/2013 10:58     | 0913-111_A | 13_10_11_1058_82_936 | 1  | 1.72           | 0.846     | 1.87               | 0.128     | 1.87           | 0.304     | 2.04         | 1.04      | 0.971                 | 0.228     | 1.27               | 0.623     |       |
| 10/11/2013 10:59     | 0913-111_A | 13_10_11_1059_83_757 | 1  | 1.72           | 0.840     | 1.71               | 0.124     | 1.85           | 0.294     | 2.04         | 1.04      | 1.01                  | 0.228     | 1.27               | 0.616     |       |
| 10/11/2013 11:00     | 0913-111_A | 13_10_11_1100_84_457 | 1  | 1.72           | 0.739     | 1.36               | 0.113     | 1.64           | 0.240     | 2.04         | 1.23      | 0.562                 | 0.230     | 1.27               | 0.551     |       |
| Average Conc. (ppm): |            |                      |    | 1              | 1.72      | 0.850              | 1.60      | 0.126          | 1.70      | 0.293        | 2.04      | 1.07                  | 0.714     | 0.227              | 1.27      | 0.628 |

| Dryer 1 Run 3       |            |                      |    |                |           |                    |           |                |           |              |           |                       |           |                    |           |       |
|---------------------|------------|----------------------|----|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|-----------|-----------------------|-----------|--------------------|-----------|-------|
| Date                | Method     | Filename             | DF | Acrolein (ppm) | SEC (ppm) | Formaldehyde (ppm) | SEC (ppm) | Methanol (ppm) | SEC (ppm) | Phenol (ppm) | SEC (ppm) | Propionaldehyde (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) |       |
| 10/11/2013 11:37    | 0913-111_A | 13_10_11_1137_48_670 | 1  | 1.72           | 0.785     | 1.48               | 0.117     | 1.23           | 0.285     | 2.04         | 1.07      | 0.452                 | 0.217     | 1.27               | 0.580     |       |
| 10/11/2013 11:38    | 0913-111_A | 13_10_11_1138_49_370 | 1  | 1.72           | 0.778     | 1.61               | 0.119     | 1.23           | 0.285     | 2.04         | 1.06      | 0.452                 | 0.211     | 1.27               | 0.572     |       |
| 10/11/2013 11:39    | 0913-111_A | 13_10_11_1139_50_160 | 1  | 1.72           | 0.799     | 1.54               | 0.121     | 1.26           | 0.284     | 1.03         | 0.452     | 0.217                 | 1.27      | 0.577              |           |       |
| 10/11/2013 11:40    | 0913-111_A | 13_10_11_1140_50_930 | 1  | 1.72           | 0.811     | 1.65               | 0.123     | 1.36           | 0.282     | 2.04         | 1.05      | 0.452                 | 0.221     | 1.27               | 0.600     |       |
| 10/11/2013 11:41    | 0913-111_A | 13_10_11_1141_51_650 | 1  | 1.72           | 0.804     | 1.67               | 0.119     | 1.30           | 0.277     | 2.04         | 1.05      | 0.452                 | 0.216     | 1.27               | 0.591     |       |
| 10/11/2013 11:42    | 0913-111_A | 13_10_11_1142_52_480 | 1  | 1.72           | 0.814     | 1.55               | 0.122     | 1.30           | 0.276     | 2.04         | 1.04      | 0.452                 | 0.218     | 1.27               | 0.601     |       |
| 10/11/2013 11:43    | 0913-111_A | 13_10_11_1143_53_130 | 1  | 1.72           | 0.821     | 1.57               | 0.121     | 1.27           | 0.276     | 2.04         | 1.02      | 0.452                 | 0.216     | 1.27               | 0.606     |       |
| 10/11/2013 11:44    | 0913-111_A | 13_10_11_1144_54_970 | 1  | 1.72           | 0.798     | 1.47               | 0.121     | 1.27           | 0.278     | 2.04         | 1.02      | 0.452                 | 0.217     | 1.27               | 0.585     |       |
| 10/11/2013 11:45    | 0913-111_A | 13_10_11_1145_54_690 | 1  | 1.72           | 0.825     | 1.60               | 0.120     | 1.30           | 0.277     | 2.04         | 1.03      | 0.452                 | 0.218     | 1.27               | 0.605     |       |
| 10/11/2013 11:46    | 0913-111_A | 13_10_11_1146_55_471 | 1  | 1.72           | 0.782     | 1.71               | 0.118     | 1.39           | 0.278     | 2.04         | 1.05      | 0.452                 | 0.210     | 1.27               | 0.580     |       |
| 10/11/2013 11:47    | 0913-111_A | 13_10_11_1147_56_221 | 1  | 1.72           | 0.807     | 1.58               | 0.120     | 1.35           | 0.278     | 2.04         | 1.04      | 0.452                 | 0.212     | 1.27               | 0.588     |       |
| 10/11/2013 11:48    | 0913-111_A | 13_10_11_1148_57_041 | 1  | 1.72           | 0.830     | 1.57               | 0.120     | 1.44           | 0.278     | 2.04         | 1.02      | 0.452                 | 0.214     | 1.27               | 0.616     |       |
| 10/11/2013 11:49    | 0913-111_A | 13_10_11_1149_57_761 | 1  | 1.72           | 0.782     | 1.69               | 0.116     | 1.55           | 0.279     | 2.04         | 1.02      | 0.464                 | 0.203     | 1.27               | 0.581     |       |
| 10/11/2013 11:50    | 0913-111_A | 13_10_11_1150_58_531 | 1  | 1.72           | 0.803     | 1.55               | 0.119     | 1.52           | 0.276     | 2.04         | 1.02      | 0.452                 | 0.206     | 1.27               | 0.595     |       |
| 10/11/2013 11:51    | 0913-111_A | 13_10_11_1151_59_131 | 1  | 1.72           | 0.808     | 1.60               | 0.119     | 1.55           | 0.277     | 2.04         | 1.03      | 0.452                 | 0.208     | 1.27               | 0.596     |       |
| 10/11/2013 11:52    | 0913-111_A | 13_10_11_1152_59_901 | 1  | 1.72           | 0.806     | 1.61               | 0.119     | 1.58           | 0.276     | 2.04         | 1.04      | 0.454                 | 0.206     | 1.27               | 0.591     |       |
| 10/11/2013 11:53    | 0913-111_A | 13_10_11_1154_00_611 | 1  | 1.72           | 0.781     | 1.61               | 0.120     | 1.58           | 0.288     | 2.04         | 0.99      | 0.452                 | 0.204     | 1.27               | 0.574     |       |
| 10/11/2013 11:55    | 0913-111_A | 13_10_11_1155_01_421 | 1  | 1.72           | 0.864     | 1.72               | 0.120     | 1.63           | 0.290     | 2.04         | 0.98      | 0.452                 | 0.209     | 1.27               | 0.635     |       |
| 10/11/2013 11:56    | 0913-111_A | 13_10_11_1156_02_101 | 1  | 1.72           | 0.812     | 1.74               | 0.123     | 1.65           | 0.286     | 2.04         | 0.97      | 0.452                 | 0.209     | 1.27               | 0.602     |       |
| 10/11/2013 11:57    | 0913-111_A | 13_10_11_1157_02_901 | 1  | 1.72           | 0.808     | 1.74               | 0.121     | 1.68           | 0.289     | 2.04         | 0.97      | 0.452                 | 0.208     | 1.27               | 0.599     |       |
| 10/11/2013 11:58    | 0913-111_A | 13_10_11_1158_03_661 | 1  | 1.72           | 0.776     | 1.56               | 0.116     | 1.67           | 0.282     | 2.04         | 0.99      | 0.562                 | 0.201     | 1.27               | 0.574     |       |
| 10/11/2013 11:59    | 0913-111_A | 13_10_11_1159_04_382 | 1  | 1.72           | 0.805     | 1.70               | 0.126     | 1.60           | 0.281     | 2.04         | 0.99      | 0.576                 | 0.213     | 1.27               | 0.603     |       |
| 10/11/2013 12:00    | 0913-111_A | 13_10_11_1200_05_121 | 1  | 1.72           | 0.838     | 1.68               | 0.123     | 1.62           | 0.287     | 2.04         | 0.99      | 0.452                 | 0.212     | 1.27               | 0.616     |       |
| 10/11/2013 12:01    | 0913-111_A | 13_10_11_1201_05_832 | 1  | 1.72           | 0.775     | 1.61               | 0.116     | 1.286          | 0.287     | 2.04         | 1.01      | 0.452                 | 0.204     | 1.27               | 0.572     |       |
| 10/11/2013 12:02    | 0913-111_A | 13_10_11_1202_06_592 | 1  | 1.72           | 0.812     | 1.59               | 0.119     | 1.57           | 0.277     | 2.04         | 1.00      | 0.452                 | 0.208     | 1.27               | 0.599     |       |
| 10/11/2013 12:03    | 0913-111_A | 13_10_11_1203_07_331 | 1  | 1.72           | 0.799     | 1.64               | 0.122     | 1.61           | 0.284     | 2.04         | 1.01      | 0.452                 | 0.206     | 1.27               | 0.594     |       |
| 10/11/2013 12:04    | 0913-111_A | 13_10_11_1204_08_092 | 1  | 1.72           | 0.823     | 1.64               | 0.120     | 1.59           | 0.286     | 2.04         | 1.01      | 0.625                 | 0.208     | 1.27               | 0.605     |       |
| 10/11/2013 12:05    | 0913-111_A | 13_10_11_1205_08_912 | 1  | 1.72           | 0.835     | 1.78               | 0.116     | 1.63           | 0.284     | 2.04         | 0.99      | 0.533                 | 0.208     | 1.27               | 0.615     |       |
| 10/11/2013 12:06    | 0913-111_A | 13_10_11_1206_09_581 | 1  | 1.72           | 0.814     | 1.75               | 0.119     | 1.63           | 0.289     | 2.04         | 0.98      | 0.567                 | 0.209     | 1.27               | 0.597     |       |
| 10/11/2013 12:07    | 0913-111_A | 13_10_11_1207_10_432 | 1  | 1.72           | 0.827     | 1.81               | 0.123     | 1.67           | 0.290     | 2.04         | 0.97      | 0.491                 | 0.215     | 1.27               | 0.610     |       |
| 10/11/2013 12:08    | 0913-111_A | 13_10_11_1208_11_142 | 1  | 1.72           | 0.789     | 1.70               | 0.116     | 1.62           | 0.282     | 2.04         | 0.98      | 0.452                 | 0.204     | 1.27               | 0.581     |       |
| 10/11/2013 12:09    | 0913-111_A | 13_10_11_1209_11_902 | 1  | 1.72           | 0.817     | 1.76               | 0.115     | 1.62           | 0.285     | 2.04         | 0.99      | 0.508                 | 0.200     | 1.27               | 0.598     |       |
| 10/11/2013 12:10    | 0913-111_A | 13_10_11_1210_12_711 | 1  | 1.72           | 0.805     | 1.72               | 0.119     | 1.60           | 0.283     | 2.04         | 0.97      | 0.452                 | 0.207     | 1.27               | 0.599     |       |
| 10/11/2013 12:11    | 0913-111_A | 13_10_11_1211_13_321 | 1  | 1.72           | 0.806     | 1.71               | 0.118     | 1.60           | 0.285     | 2.04         | 0.99      | 0.452                 | 0.206     | 1.27               | 0.595     |       |
| 10/11/2013 12:12    | 0913-111_A | 13_10_11_1212_14_183 | 1  | 1.72           | 0.782     | 1.74               | 0.121     | 1.63           | 0.286     | 2.04         | 1.00      | 0.452                 | 0.209     | 1.27               | 0.577     |       |
| 10/11/2013 12:13    | 0913-111_A | 13_10_11_1213_14_893 | 1  | 1.72           | 0.806     | 1.53               | 0.118     | 1.67           | 0.284     | 2.04         | 1.00      | 0.452                 | 0.206     | 1.27               | 0.595     |       |
| 10/11/2013 12:14    | 0913-111_A | 13_10_11_1214_15_701 | 1  | 1.72           | 0.828     | 1.82               | 0.119     | 1.64           | 0.284     | 2.04         | 0.99      | 0.618                 | 0.212     | 1.27               | 0.619     |       |
| 10/11/2013 12:15    | 0913-111_A | 13_10_11_1215_16_453 | 1  | 1.72           | 0.801     | 1.73               | 0.118     | 1.59           | 0.288     | 2.04         | 0.99      | 0.474                 | 0.207     | 1.27               | 0.591     |       |
| 10/11/2013 12:16    | 0913-111_A | 13_10_11_1216_17_183 | 1  | 1.72           | 0.830     | 1.78               | 0.122     | 1.62           | 0.287     | 2.04         | 0.98      | 0.474                 | 0.215     | 1.27               | 0.607     |       |
| 10/11/2013 12:17    | 0913-111_A | 13_10_11_1217_18_003 | 1  | 1.72           | 0.803     | 1.84               | 0.119     | 1.61           | 0.292     | 2.04         | 0.97      | 0.452                 | 0.209     | 1.27               | 0.590     |       |
| 10/11/2013 12:18    | 0913-111_A | 13_10_11_1218_18_713 | 1  | 1.72           | 0.769     | 1.85               | 0.119     | 1.68           | 0.287     | 2.04         | 0.97      | 0.565                 | 0.208     | 1.27               | 0.587     |       |
| 10/11/2013 12:19    | 0913-111_A | 13_10_11_1219_19_481 | 1  | 1.72           | 0.801     | 1.82               | 0.121     | 1.62           | 0.287     | 2.04         | 0.98      | 0.465                 | 0.212     | 1.27               | 0.592     |       |
| 10/11/2013 12:20    | 0913-111_A | 13_10_11_1220_20_233 | 1  | 1.72           | 0.801     | 1.88               | 0.121     | 1.64           | 0.287     | 2.04         | 0.98      | 0.452                 | 0.213     | 1.27               | 0.588     |       |
| 10/11/2013 12:21    | 0913-111_A | 13_10_11_1221_20_953 | 1  | 1.72           | 0.816     | 1.74               | 0.119     | 1.59           | 0.286     | 2.04         | 0.98      | 0.532                 | 0.217     | 1.27               | 0.604     |       |
| 10/11/2013 12:22    | 0913-111_A | 13_10_11_1222_21_693 | 1  | 1.72           | 0.801     | 2.02               | 0.119     | 1.68           | 0.291     | 2.04         | 0.98      | 0.509                 | 0.212     | 1.27               | 0.592     |       |
| 10/11/2013 12:23    | 0913-111_A | 13_10_11_1223_22_451 | 1  | 1.72           | 0.825     | 1.95               | 0.122     | 1.68           | 0.287     | 2.04         | 0.97      | 0.688                 | 0.217     | 1.27               | 0.614     |       |
| 10/11/2013 12:24    | 0913-111_A | 13_10_11_1224_23_174 | 1  | 1.72           | 0.825     | 1.88               | 0.122     | 1.72           | 0.296     | 2.04         | 0.96      | 0.633                 | 0.217     | 1.27               | 0.611     |       |
| 10/11/2013 12:25    | 0913-111_A | 13_10_11_1225_23_994 | 1  | 1.72           | 0.845     | 1.97               | 0.121     | 1.77           | 0.297     | 2.04         | 0.97      | 0.614                 | 0.220     | 1.27               | 0.627     |       |
| 10/11/2013 12:26    | 0913-111_A | 13_10_11_1226_24_704 | 1  | 1.72           | 0.826     | 2.00               | 0.121     | 1.71           | 0.303     | 2.04         | 0.96      | 0.544                 | 0.221     | 1.27               | 0.611     |       |
| 10/11/2013 12:27    | 0913-111_A | 13_10_11_1227_25_511 | 1  | 1.72           | 0.836     | 1.98               | 0.122     | 1.77           | 0.304     | 2.04         | 0.97      | 0.574                 | 0.221     | 1.27               | 0.610     |       |
| 10/11/2013 12:28    | 0913-111_A | 13_10_11_1228_26_034 | 1  | 1.72           | 0.833     | 2.21               | 0.123     | 1.84           | 0.305     | 2.04         | 0.92      | 0.566                 | 0.219     | 1.27               | 0.615     |       |
| 10/11/2013 12:29    | 0913-111_A | 13_10_11_1229_27_224 | 1  | 1.72           | 0.830     | 2.20               | 0.125     | 1.91           | 0.301     | 2.04         | 0.94      | 0.796                 | 0.225     | 1.27               | 0.615     |       |
| 10/11/2013 12:31    | 0913-111_A | 13_10_11_1231_37_650 | 1  | 1.72           | 0.828     | 2.19               | 0.123     | 1.86           | 0.294     | 2.04         | 0.95      | 0.577                 | 0.219     | 1.27               | 0.607     |       |
| 10/11/2013 12:32    | 0913-111_A | 13_10_11_1232_38_340 | 1  | 1.72           | 0.820     | 2.19               | 0.123     | 1.73           | 0.286     | 2.04         | 0.95      | 0.854                 | 0.220     | 1.27               | 0.605     |       |
| 10/11/2013 12:33    | 0913-111_A | 13_10_11_1233_39_140 | 1  | 1.72           | 0.810     | 2.02               | 0.123     | 1.71           | 0.287     | 2.04         | 0.91      | 0.516                 | 0.217     | 1.27               | 0.602     |       |
| 10/11/2013 12:34    | 0913-111_A | 13_10_11_1234_39_730 | 1  | 1.72           | 0.839     | 2.14               | 0.123     | 1.84           | 0.300     | 2.04         | 0.94      | 0.607                 | 0.224     | 1.27               | 0.617     |       |
| 10/11/2013 12:35    | 0913-111_A | 13_10_11_1235_40_510 | 1  | 1.72           | 0.851     | 2.37               | 0.122     | 1.82           | 0.305     | 2.04         | 0.93      | 0.635                 | 0.223     | 1.27               | 0.627     |       |
| 10/11/2013 12:36    | 0913-111_A | 13_10_11_1236_41_230 | 1  | 1.72           | 0.826     | 2.68               | 0.124     | 2.06           | 0.312     | 2.04         | 0.92      | 0.648                 | 0.226     | 1.27               | 0.606     |       |
| Average Conc (ppm): |            |                      |    | 1              | 1.72      | 0.812              | 1.78      | 0.120          | 1.59      | 0.287        | 2.04      | 0.99                  | 0.505     | 0.213              | 1.27      | 0.598 |

|                  |                |
|------------------|----------------|
| Company          | ACT            |
| Analyst Initials | CTJ            |
| Parameters       | EPA Method 320 |
| # Samples        | 21             |
| Runs             | Runs           |

|             |                      |
|-------------|----------------------|
| Client #    | 1911                 |
| Job #       | 0913-111             |
| PO #        | 3134 1911            |
| Report Date | VO.62 13.10.18.12.58 |

#### Pellet Cooler 2 Run 1

| Date                 | Method     | Filename             | DF | Acrolein (ppm) | SEC (ppm) | Formaldehyde (ppm) | SEC (ppm) | Methanol (ppm) | SEC (ppm) | Phenol (ppm) | SEC (ppm) | Propionaldehyde (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) |       |
|----------------------|------------|----------------------|----|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|-----------|-----------------------|-----------|--------------------|-----------|-------|
| 10/11/2013 13:44     | 0913-111_A | 13_10_11_1344_00_484 | 1  | 1.00           | 0.514     | 1.46               | 0.0740    | 0.972          | 0.0810    | 1.08         | 0.54      | 0.246                 | 0.127     | 1.07               | 0.386     |       |
| 10/11/2013 13:45     | 0913-111_A | 13_10_11_1345_01_204 | 1  | 1.21           | 0.477     | 1.41               | 0.0700    | 0.939          | 0.0810    | 1.08         | 0.53      | 0.246                 | 0.126     | 1.10               | 0.362     |       |
| 10/11/2013 13:46     | 0913-111_A | 13_10_11_1346_02_004 | 1  | 1.38           | 0.509     | 1.09               | 0.0710    | 0.876          | 0.0810    | 1.09         | 0.53      | 0.246                 | 0.124     | 1.10               | 0.384     |       |
| 10/11/2013 13:47     | 0913-111_A | 13_10_11_1347_02_754 | 1  | 1.00           | 0.492     | 1.15               | 0.0710    | 0.801          | 0.0790    | 1.08         | 0.53      | 0.246                 | 0.122     | 0.812              | 0.377     |       |
| 10/11/2013 13:48     | 0913-111_A | 13_10_11_1348_03_454 | 1  | 1.39           | 0.518     | 1.03               | 0.0690    | 0.829          | 0.0820    | 1.08         | 0.53      | 0.246                 | 0.123     | 0.745              | 0.381     |       |
| 10/11/2013 13:49     | 0913-111_A | 13_10_11_1349_04_244 | 1  | 1.06           | 0.453     | 1.02               | 0.0690    | 0.798          | 0.0790    | 1.08         | 0.54      | 0.246                 | 0.117     | 0.878              | 0.338     |       |
| 10/11/2013 13:50     | 0913-111_A | 13_10_11_1350_05_004 | 1  | 1.47           | 0.480     | 1.00               | 0.0700    | 0.818          | 0.0820    | 1.08         | 0.54      | 0.246                 | 0.119     | 0.745              | 0.355     |       |
| 10/11/2013 13:51     | 0913-111_A | 13_10_11_1351_05_795 | 1  | 1.89           | 0.503     | 1.05               | 0.0750    | 0.826          | 0.0830    | 1.08         | 0.54      | 0.246                 | 0.126     | 0.745              | 0.381     |       |
| 10/11/2013 13:52     | 0913-111_A | 13_10_11_1352_06_545 | 1  | 2.23           | 0.464     | 0.964              | 0.0750    | 0.730          | 0.0800    | 1.08         | 0.53      | 0.246                 | 0.124     | 1.12               | 0.353     |       |
| 10/11/2013 13:53     | 0913-111_A | 13_10_11_1353_07_335 | 1  | 1.00           | 0.521     | 1.10               | 0.0740    | 0.859          | 0.0800    | 1.08         | 0.53      | 0.246                 | 0.128     | 0.819              | 0.388     |       |
| 10/11/2013 13:54     | 0913-111_A | 13_10_11_1354_08_045 | 1  | 1.00           | 0.498     | 1.02               | 0.0680    | 0.823          | 0.0830    | 1.08         | 0.54      | 0.246                 | 0.121     | 0.884              | 0.368     |       |
| 10/11/2013 13:55     | 0913-111_A | 13_10_11_1355_08_815 | 1  | 2.04           | 0.513     | 1.06               | 0.0750    | 0.829          | 0.0800    | 1.08         | 0.54      | 0.246                 | 0.128     | 0.907              | 0.392     |       |
| 10/11/2013 13:56     | 0913-111_A | 13_10_11_1356_09_515 | 1  | 1.85           | 0.514     | 1.06               | 0.0750    | 0.861          | 0.0800    | 1.08         | 0.53      | 0.246                 | 0.127     | 0.874              | 0.384     |       |
| 10/11/2013 13:57     | 0913-111_A | 13_10_11_1357_10_335 | 1  | 1.12           | 0.488     | 1.15               | 0.0660    | 0.904          | 0.0840    | 1.08         | 0.54      | 0.246                 | 0.116     | 0.784              | 0.360     |       |
| 10/11/2013 13:58     | 0913-111_A | 13_10_11_1358_11_105 | 1  | 1.00           | 0.487     | 1.12               | 0.0700    | 0.817          | 0.0820    | 1.08         | 0.54      | 0.246                 | 0.122     | 1.02               | 0.360     |       |
| 10/11/2013 13:59     | 0913-111_A | 13_10_11_1359_11_825 | 1  | 1.00           | 0.480     | 1.11               | 0.0730    | 0.851          | 0.0830    | 1.08         | 0.53      | 0.246                 | 0.124     | 1.23               | 0.358     |       |
| 10/11/2013 14:00     | 0913-111_A | 13_10_11_1400_12_475 | 1  | 1.18           | 0.488     | 1.01               | 0.0700    | 0.854          | 0.0830    | 1.08         | 0.54      | 0.246                 | 0.124     | 1.19               | 0.363     |       |
| 10/11/2013 14:01     | 0913-111_A | 13_10_11_1401_13_185 | 1  | 1.00           | 0.514     | 1.08               | 0.0720    | 0.822          | 0.0770    | 1.08         | 0.53      | 0.246                 | 0.124     | 0.745              | 0.381     |       |
| 10/11/2013 14:02     | 0913-111_A | 13_10_11_1402_13_945 | 1  | 1.42           | 0.493     | 1.05               | 0.0730    | 0.833          | 0.0800    | 1.08         | 0.53      | 0.246                 | 0.122     | 0.862              | 0.368     |       |
| 10/11/2013 14:03     | 0913-111_A | 13_10_11_1403_14_706 | 1  | 1.36           | 0.505     | 1.03               | 0.0690    | 0.804          | 0.0790    | 1.08         | 0.53      | 0.246                 | 0.122     | 0.745              | 0.377     |       |
| 10/11/2013 14:04     | 0913-111_A | 13_10_11_1404_15_456 | 1  | 1.18           | 0.484     | 1.06               | 0.0690    | 0.787          | 0.0810    | 1.08         | 0.54      | 0.246                 | 0.124     | 0.869              | 0.366     |       |
| 10/11/2013 14:05     | 0913-111_A | 13_10_11_1405_16_186 | 1  | 1.00           | 0.489     | 1.11               | 0.0680    | 0.832          | 0.0810    | 1.08         | 0.54      | 0.246                 | 0.121     | 0.745              | 0.368     |       |
| 10/11/2013 14:06     | 0913-111_A | 13_10_11_1406_16_946 | 1  | 1.11           | 0.527     | 1.01               | 0.0670    | 0.828          | 0.0800    | 1.08         | 0.54      | 0.246                 | 0.124     | 0.765              | 0.390     |       |
| 10/11/2013 14:07     | 0913-111_A | 13_10_11_1407_17_746 | 1  | 1.00           | 0.486     | 1.11               | 0.0690    | 0.796          | 0.0810    | 1.08         | 0.53      | 0.246                 | 0.121     | 0.917              | 0.367     |       |
| 10/11/2013 14:08     | 0913-111_A | 13_10_11_1408_18_506 | 1  | 1.28           | 0.491     | 1.10               | 0.0700    | 0.797          | 0.0790    | 1.08         | 0.53      | 0.246                 | 0.122     | 0.875              | 0.365     |       |
| 10/11/2013 14:09     | 0913-111_A | 13_10_11_1409_19_206 | 1  | 1.00           | 0.486     | 1.09               | 0.0710    | 0.804          | 0.0790    | 1.08         | 0.53      | 0.246                 | 0.123     | 0.745              | 0.374     |       |
| 10/11/2013 14:10     | 0913-111_A | 13_10_11_1410_20_016 | 1  | 1.06           | 0.496     | 1.05               | 0.0680    | 0.853          | 0.0790    | 1.08         | 0.53      | 0.246                 | 0.122     | 1.05               | 0.377     |       |
| 10/11/2013 14:11     | 0913-111_A | 13_10_11_1411_20_696 | 1  | 1.24           | 0.504     | 1.04               | 0.0710    | 0.818          | 0.0790    | 1.08         | 0.53      | 0.246                 | 0.125     | 1.21               | 0.376     |       |
| 10/11/2013 14:12     | 0913-111_A | 13_10_11_1412_21_506 | 1  | 1.11           | 0.489     | 1.10               | 0.0680    | 0.905          | 0.0770    | 1.08         | 0.53      | 0.246                 | 0.123     | 1.06               | 0.363     |       |
| 10/11/2013 14:13     | 0913-111_A | 13_10_11_1413_22_276 | 1  | 1.23           | 0.489     | 1.06               | 0.0720    | 0.778          | 0.0790    | 1.08         | 0.53      | 0.246                 | 0.121     | 0.958              | 0.367     |       |
| 10/11/2013 14:14     | 0913-111_A | 13_10_11_1414_22_977 | 1  | 1.14           | 0.476     | 1.17               | 0.0730    | 0.810          | 0.0810    | 1.08         | 0.54      | 0.246                 | 0.123     | 0.745              | 0.361     |       |
| 10/11/2013 14:15     | 0913-111_A | 13_10_11_1415_23_697 | 1  | 1.13           | 0.488     | 0.926              | 0.0730    | 0.808          | 0.0800    | 1.08         | 0.54      | 0.246                 | 0.125     | 0.745              | 0.367     |       |
| 10/11/2013 14:16     | 0913-111_A | 13_10_11_1416_24_517 | 1  | 1.50           | 0.503     | 1.06               | 0.0710    | 0.831          | 0.0830    | 1.08         | 0.54      | 0.246                 | 0.127     | 0.947              | 0.370     |       |
| 10/11/2013 14:17     | 0913-111_A | 13_10_11_1417_25_267 | 1  | 1.00           | 0.504     | 1.14               | 0.0700    | 0.791          | 0.0790    | 1.08         | 0.54      | 0.246                 | 0.122     | 0.887              | 0.371     |       |
| 10/11/2013 14:18     | 0913-111_A | 13_10_11_1418_26_027 | 1  | 1.27           | 0.515     | 1.05               | 0.0710    | 0.820          | 0.0810    | 1.08         | 0.54      | 0.246                 | 0.125     | 0.745              | 0.380     |       |
| 10/11/2013 14:19     | 0913-111_A | 13_10_11_1419_26_687 | 1  | 1.72           | 0.503     | 1.07               | 0.0700    | 0.766          | 0.0810    | 1.08         | 0.54      | 0.246                 | 0.125     | 0.745              | 0.371     |       |
| 10/11/2013 14:20     | 0913-111_A | 13_10_11_1420_27_457 | 1  | 1.45           | 0.468     | 1.11               | 0.0720    | 0.824          | 0.0820    | 1.08         | 0.54      | 0.246                 | 0.125     | 1.13               | 0.350     |       |
| 10/11/2013 14:21     | 0913-111_A | 13_10_11_1421_28_207 | 1  | 1.09           | 0.495     | 1.04               | 0.0710    | 0.744          | 0.0800    | 1.08         | 0.54      | 0.246                 | 0.124     | 0.745              | 0.363     |       |
| 10/11/2013 14:22     | 0913-111_A | 13_10_11_1422_29_067 | 1  | 1.40           | 0.499     | 1.07               | 0.0710    | 0.804          | 0.0810    | 1.08         | 0.54      | 0.246                 | 0.125     | 0.745              | 0.369     |       |
| 10/11/2013 14:23     | 0913-111_A | 13_10_11_1423_29_697 | 1  | 1.80           | 0.513     | 1.12               | 0.0710    | 0.798          | 0.0820    | 1.08         | 0.54      | 0.246                 | 0.125     | 0.905              | 0.382     |       |
| 10/11/2013 14:24     | 0913-111_A | 13_10_11_1424_30_467 | 1  | 1.46           | 0.492     | 1.11               | 0.0700    | 0.785          | 0.0820    | 1.08         | 0.54      | 0.246                 | 0.124     | 0.928              | 0.369     |       |
| 10/11/2013 14:25     | 0913-111_A | 13_10_11_1425_31_177 | 1  | 1.00           | 0.488     | 1.09               | 0.0680    | 0.824          | 0.0830    | 1.08         | 0.54      | 0.246                 | 0.124     | 0.901              | 0.361     |       |
| 10/11/2013 14:26     | 0913-111_A | 13_10_11_1426_31_988 | 1  | 1.62           | 0.517     | 1.12               | 0.0740    | 0.781          | 0.0810    | 1.08         | 0.54      | 0.246                 | 0.129     | 0.946              | 0.380     |       |
| 10/11/2013 14:27     | 0913-111_A | 13_10_11_1427_32_718 | 1  | 1.00           | 0.462     | 1.07               | 0.0700    | 0.751          | 0.0820    | 1.08         | 0.54      | 0.246                 | 0.124     | 0.845              | 0.364     |       |
| 10/11/2013 14:28     | 0913-111_A | 13_10_11_1428_33_468 | 1  | 1.94           | 0.493     | 1.07               | 0.0700    | 0.752          | 0.0810    | 1.08         | 0.54      | 0.246                 | 0.128     | 0.745              | 0.366     |       |
| 10/11/2013 14:29     | 0913-111_A | 13_10_11_1429_34_178 | 1  | 1.00           | 0.513     | 1.04               | 0.0720    | 0.778          | 0.0840    | 1.08         | 0.54      | 0.246                 | 0.127     | 0.745              | 0.380     |       |
| 10/11/2013 14:30     | 0913-111_A | 13_10_11_1430_35_028 | 1  | 1.00           | 0.518     | 0.998              | 0.0750    | 0.794          | 0.0830    | 1.08         | 0.54      | 0.246                 | 0.129     | 0.996              | 0.380     |       |
| 10/11/2013 14:31     | 0913-111_A | 13_10_11_1431_36_267 | 1  | 1.56           | 0.487     | 1.04               | 0.0690    | 0.789          | 0.0840    | 1.08         | 0.54      | 0.246                 | 0.126     | 0.745              | 0.362     |       |
| 10/11/2013 14:32     | 0913-111_A | 13_10_11_1432_36_498 | 1  | 1.19           | 0.506     | 1.04               | 0.0730    | 0.760          | 0.0820    | 1.08         | 0.54      | 0.246                 | 0.128     | 0.745              | 0.379     |       |
| 10/11/2013 14:33     | 0913-111_A | 13_10_11_1433_37_208 | 1  | 1.00           | 0.487     | 1.06               | 0.0730    | 0.774          | 0.0830    | 1.08         | 0.54      | 0.246                 | 0.127     | 0.760              | 0.368     |       |
| 10/11/2013 14:34     | 0913-111_A | 13_10_11_1434_38_918 | 1  | 1.06           | 0.496     | 1.14               | 0.0700    | 0.750          | 0.0830    | 1.08         | 0.54      | 0.246                 | 0.126     | 0.788              | 0.374     |       |
| 10/11/2013 14:35     | 0913-111_A | 13_10_11_1435_38_748 | 1  | 1.00           | 0.467     | 1.06               | 0.0670    | 0.796          | 0.0840    | 1.08         | 0.55      | 0.246                 | 0.122     | 0.745              | 0.349     |       |
| 10/11/2013 14:36     | 0913-111_A | 13_10_11_1436_39_488 | 1  | 2.12           | 0.463     | 1.08               | 0.0690    | 0.726          | 0.0840    | 1.08         | 0.55      | 0.246                 | 0.124     | 0.780              | 0.350     |       |
| 10/11/2013 14:37     | 0913-111_A | 13_10_11_1437_40_168 | 1  | 1.85           | 0.508     | 1.00               | 0.0730    | 0.722          | 0.0850    | 1.08         | 0.55      | 0.246                 | 0.128     | 0.745              | 0.374     |       |
| 10/11/2013 14:38     | 0913-111_A | 13_10_11_1438_40_969 | 1  | 1.55           | 0.494     | 0.950              | 0.0740    | 0.789          | 0.0840    | 1.08         | 0.55      | 0.246                 | 0.126     | 0.784              | 0.372     |       |
| 10/11/2013 14:39     | 0913-111_A | 13_10_11_1439_41_669 | 1  | 1.00           | 0.513     | 1.05               | 0.0750    | 0.750          | 0.0860    | 1.08         | 0.55      | 0.246                 | 0.131     | 0.745              | 0.379     |       |
| 10/11/2013 14:40     | 0913-111_A | 13_10_11_1440_42_449 | 1  | 1.45           | 0.487     | 1.12               | 0.0720    | 0.710          | 0.0880    | 1.08         | 0.56      | 0.246                 | 0.127     | 0.745              | 0.382     |       |
| 10/11/2013 14:41     | 0913-111_A | 13_10_11_1441_43_159 | 1  | 1.17           | 0.522     | 1.12               | 0.0730    | 0.768          | 0.0860    | 1.08         | 0.55      | 0.246                 | 0.132     | 0.745              | 0.386     |       |
| 10/11/2013 14:42     | 0913-111_A | 13_10_11_1442_43_779 | 1  | 1.00           | 0.517     | 0.993              | 0.0710    | 0.760          | 0.0860    | 1.08         | 0.55      | 0.246                 | 0.127     | 0.745              | 0.381     |       |
| 10/11/2013 14:43     | 0913-111_A | 13_10_11_1443_44_609 | 1  | 1.44           | 0.475     | 0.493              | 0.0680    | 0.333          | 0.0580    | 1.08         | 0.39      | 0.246                 | 0.153     | 0.745              | 0.359     |       |
| Average Conc. (ppm): |            |                      |    | 1              | 1.29      | 0.496              | 1.07      | 0.0711         | 0.797     | 0.0813       | 1.08      | 0.54                  | 0.246     | 0.125              | 0.864     | 0.370 |

#### Pellet Cooler 2 Run 2

| Date             | Method     | Filename             | DF | Acrolein (ppm) | SEC (ppm) | Formaldehyde (ppm) | SEC (ppm) | Methanol (ppm) | SEC (ppm) | Phenol (ppm) | SEC (ppm) | Propionaldehyde (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) |
|------------------|------------|----------------------|----|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|-----------|-----------------------|-----------|--------------------|-----------|
| 10/11/2013 15:08 | 0913-111_A | 13_10_11_1508_02_515 | 1  | 1.00           | 0.480     | 0.460              | 0.0650    | 0.602          | 0.0840</  |              |           |                       |           |                    |           |

|                  |                |
|------------------|----------------|
| Company          | ACT            |
| Analyst Initials | CJT            |
| Parameters       | EPA Method 320 |
| # Samples        | 21 Runs        |

|             |                      |
|-------------|----------------------|
| Client #    | 1911                 |
| Job #       | 0913-111             |
| PO #        | 3134 1911            |
| Report Date | VO.62 13.10.18.12.58 |

#### Pellet Cooler 2 Run 3

| Date                 | Method     | Filename             | DF | Acrolein (ppm) | SEC (ppm) | Formaldehyde (ppm) | SEC (ppm) | Methanol (ppm) | SEC (ppm) | Phenol (ppm) | SEC (ppm) | Propionaldehyde (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) |       |
|----------------------|------------|----------------------|----|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|-----------|-----------------------|-----------|--------------------|-----------|-------|
| 10/11/2013 16:29     | 0913-111_A | 13_10_11_1629_02_222 | 1  | 1.41           | 0.500     | 1.27               | 0.0750    | 0.793          | 0.0840    | 1.08         | 0.55      | 0.246                 | 0.125     | 0.989              | 0.379     |       |
| 10/11/2013 16:30     | 0913-111_A | 13_10_11_1630_02_972 | 1  | 1.08           | 0.520     | 1.12               | 0.0740    | 0.741          | 0.0840    | 1.08         | 0.55      | 0.246                 | 0.125     | 0.787              | 0.385     |       |
| 10/11/2013 16:31     | 0913-111_A | 13_10_11_1631_03_632 | 1  | 1.13           | 0.505     | 0.905              | 0.0710    | 0.715          | 0.0850    | 1.08         | 0.55      | 0.246                 | 0.119     | 1.25               | 0.374     |       |
| 10/11/2013 16:32     | 0913-111_A | 13_10_11_1632_04_442 | 1  | 1.00           | 0.521     | 1.10               | 0.0720    | 0.688          | 0.0820    | 1.08         | 0.55      | 0.246                 | 0.123     | 1.18               | 0.385     |       |
| 10/11/2013 16:33     | 0913-111_A | 13_10_11_1633_05_202 | 1  | 1.11           | 0.507     | 1.07               | 0.0730    | 0.780          | 0.0840    | 1.08         | 0.55      | 0.246                 | 0.118     | 0.745              | 0.384     |       |
| 10/11/2013 16:34     | 0913-111_A | 13_10_11_1634_05_962 | 1  | 1.25           | 0.512     | 1.11               | 0.0690    | 0.837          | 0.0870    | 1.08         | 0.55      | 0.246                 | 0.117     | 1.02               | 0.379     |       |
| 10/11/2013 16:35     | 0913-111_A | 13_10_11_1635_06_772 | 1  | 1.27           | 0.525     | 1.12               | 0.0730    | 0.837          | 0.0860    | 1.08         | 0.55      | 0.246                 | 0.125     | 0.991              | 0.388     |       |
| 10/11/2013 16:36     | 0913-111_A | 13_10_11_1636_07_512 | 1  | 1.00           | 0.524     | 1.20               | 0.0760    | 0.931          | 0.0840    | 1.08         | 0.55      | 0.246                 | 0.124     | 0.745              | 0.395     |       |
| 10/11/2013 16:37     | 0913-111_A | 13_10_11_1637_08_223 | 1  | 1.00           | 0.528     | 1.19               | 0.0760    | 0.867          | 0.0880    | 1.08         | 0.56      | 0.246                 | 0.127     | 0.745              | 0.393     |       |
| 10/11/2013 16:38     | 0913-111_A | 13_10_11_1638_08_953 | 1  | 1.67           | 0.504     | 1.20               | 0.0780    | 0.906          | 0.0860    | 1.08         | 0.56      | 0.246                 | 0.129     | 1.16               | 0.377     |       |
| 10/11/2013 16:39     | 0913-111_A | 13_10_11_1639_09_743 | 1  | 1.00           | 0.532     | 1.28               | 0.0740    | 0.932          | 0.0870    | 1.08         | 0.56      | 0.246                 | 0.125     | 0.745              | 0.390     |       |
| 10/11/2013 16:40     | 0913-111_A | 13_10_11_1640_10_493 | 1  | 1.00           | 0.536     | 1.34               | 0.0770    | 0.956          | 0.0870    | 1.08         | 0.56      | 0.246                 | 0.129     | 0.745              | 0.394     |       |
| 10/11/2013 16:41     | 0913-111_A | 13_10_11_1641_11_243 | 1  | 1.10           | 0.505     | 1.31               | 0.0720    | 0.940          | 0.0880    | 1.08         | 0.56      | 0.246                 | 0.122     | 0.745              | 0.372     |       |
| 10/11/2013 16:42     | 0913-111_A | 13_10_11_1642_12_003 | 1  | 1.05           | 0.482     | 1.31               | 0.0690    | 0.921          | 0.0880    | 1.08         | 0.56      | 0.246                 | 0.121     | 0.922              | 0.362     |       |
| 10/11/2013 16:43     | 0913-111_A | 13_10_11_1643_12_743 | 1  | 1.49           | 0.519     | 1.42               | 0.0730    | 0.948          | 0.0870    | 1.08         | 0.56      | 0.246                 | 0.129     | 0.746              | 0.387     |       |
| 10/11/2013 16:44     | 0913-111_A | 13_10_11_1644_13_493 | 1  | 1.52           | 0.519     | 1.30               | 0.0740    | 0.951          | 0.0850    | 1.08         | 0.56      | 0.246                 | 0.129     | 0.745              | 0.388     |       |
| 10/11/2013 16:45     | 0913-111_A | 13_10_11_1645_14_293 | 1  | 2.25           | 0.539     | 3.47               | 0.0800    | 1.675          | 0.0870    | 1.49         | 0.57      | 1.49                  | 0.143     | 0.745              | 0.403     |       |
| 10/11/2013 16:46     | 0913-111_A | 13_10_11_1646_15_003 | 1  | 2.60           | 0.502     | 3.49               | 0.0810    | 1.271          | 0.0870    | 1.14         | 0.56      | 1.16                  | 0.139     | 0.745              | 0.372     |       |
| 10/11/2013 16:47     | 0913-111_A | 13_10_11_1647_15_783 | 1  | 2.07           | 0.525     | 2.98               | 0.0800    | 1.030          | 0.0880    | 1.08         | 0.56      | 0.670                 | 0.136     | 0.745              | 0.390     |       |
| 10/11/2013 16:48     | 0913-111_A | 13_10_11_1648_16_503 | 1  | 1.17           | 0.504     | 2.40               | 0.0760    | 0.875          | 0.0860    | 1.08         | 0.56      | 0.621                 | 0.131     | 0.745              | 0.371     |       |
| 10/11/2013 16:49     | 0913-111_A | 13_10_11_1649_17_254 | 1  | 1.44           | 0.509     | 2.21               | 0.0760    | 0.739          | 0.0830    | 1.08         | 0.55      | 0.485                 | 0.129     | 0.745              | 0.378     |       |
| 10/11/2013 16:50     | 0913-111_A | 13_10_11_1650_17_954 | 1  | 1.22           | 0.521     | 2.09               | 0.0720    | 0.746          | 0.0850    | 1.08         | 0.56      | 0.404                 | 0.124     | 0.745              | 0.384     |       |
| 10/11/2013 16:51     | 0913-111_A | 13_10_11_1651_18_704 | 1  | 1.05           | 0.503     | 2.16               | 0.0770    | 0.833          | 0.0860    | 1.08         | 0.56      | 0.347                 | 0.125     | 0.745              | 0.379     |       |
| 10/11/2013 16:52     | 0913-111_A | 13_10_11_1652_19_514 | 1  | 1.67           | 0.515     | 2.13               | 0.0750    | 0.842          | 0.0880    | 1.08         | 0.56      | 0.424                 | 0.125     | 0.745              | 0.389     |       |
| 10/11/2013 16:53     | 0913-111_A | 13_10_11_1653_20_254 | 1  | 1.18           | 0.528     | 2.14               | 0.0770    | 0.888          | 0.0860    | 1.08         | 0.56      | 0.259                 | 0.129     | 0.745              | 0.385     |       |
| 10/11/2013 16:54     | 0913-111_A | 13_10_11_1654_20_974 | 1  | 0.486          | 0.496     | 2.22               | 0.0780    | 0.804          | 0.0840    | 1.08         | 0.56      | 0.309                 | 0.122     | 0.745              | 0.380     |       |
| 10/11/2013 16:55     | 0913-111_A | 13_10_11_1655_21_734 | 1  | 1.00           | 0.521     | 2.23               | 0.0750    | 0.784          | 0.0880    | 1.08         | 0.56      | 0.338                 | 0.127     | 0.745              | 0.390     |       |
| 10/11/2013 16:56     | 0913-111_A | 13_10_11_1656_22_484 | 1  | 1.79           | 0.517     | 2.23               | 0.0730    | 0.820          | 0.0840    | 1.08         | 0.55      | 0.618                 | 0.128     | 0.745              | 0.385     |       |
| 10/11/2013 16:57     | 0913-111_A | 13_10_11_1657_23_244 | 1  | 1.00           | 0.521     | 2.01               | 0.0750    | 0.867          | 0.0830    | 1.08         | 0.55      | 0.447                 | 0.127     | 0.745              | 0.382     |       |
| 10/11/2013 16:58     | 0913-111_A | 13_10_11_1658_24_004 | 1  | 1.43           | 0.494     | 2.09               | 0.0720    | 0.753          | 0.0870    | 1.08         | 0.56      | 0.246                 | 0.125     | 0.745              | 0.376     |       |
| 10/11/2013 16:59     | 0913-111_A | 13_10_11_1659_24_714 | 1  | 1.44           | 0.527     | 2.01               | 0.0720    | 0.783          | 0.0840    | 1.08         | 0.55      | 0.434                 | 0.127     | 0.745              | 0.388     |       |
| 10/11/2013 17:00     | 0913-111_A | 13_10_11_1700_25_504 | 1  | 1.00           | 0.521     | 2.05               | 0.0760    | 0.806          | 0.0840    | 1.08         | 0.55      | 0.460                 | 0.128     | 0.745              | 0.393     |       |
| 10/11/2013 17:01     | 0913-111_A | 13_10_11_1701_26_275 | 1  | 1.46           | 0.530     | 1.98               | 0.0740    | 0.722          | 0.0830    | 1.08         | 0.55      | 0.463                 | 0.125     | 0.745              | 0.392     |       |
| 10/11/2013 17:02     | 0913-111_A | 13_10_11_1702_27_015 | 1  | 0.486          | 0.496     | 1.94               | 0.0690    | 0.730          | 0.0840    | 1.08         | 0.55      | 0.246                 | 0.120     | 0.745              | 0.371     |       |
| 10/11/2013 17:03     | 0913-111_A | 13_10_11_1703_27_725 | 1  | 1.80           | 0.504     | 1.90               | 0.0750    | 0.855          | 0.0850    | 1.08         | 0.55      | 0.265                 | 0.128     | 0.745              | 0.385     |       |
| 10/11/2013 17:04     | 0913-111_A | 13_10_11_1704_28_495 | 1  | 1.37           | 0.488     | 1.78               | 0.0730    | 0.737          | 0.0850    | 1.08         | 0.55      | 0.380                 | 0.122     | 0.745              | 0.364     |       |
| 10/11/2013 17:05     | 0913-111_A | 13_10_11_1705_29_235 | 1  | 1.64           | 0.497     | 1.88               | 0.0720    | 0.809          | 0.0820    | 1.08         | 0.55      | 0.246                 | 0.121     | 0.745              | 0.364     |       |
| 10/11/2013 17:06     | 0913-111_A | 13_10_11_1706_30_015 | 1  | 1.24           | 0.491     | 1.92               | 0.0710    | 0.776          | 0.0820    | 1.08         | 0.55      | 0.313                 | 0.119     | 0.761              | 0.370     |       |
| 10/11/2013 17:07     | 0913-111_A | 13_10_11_1707_30_725 | 1  | 1.00           | 0.524     | 1.92               | 0.0730    | 0.800          | 0.0840    | 1.08         | 0.55      | 0.323                 | 0.119     | 0.745              | 0.380     |       |
| 10/11/2013 17:08     | 0913-111_A | 13_10_11_1708_31_445 | 1  | 1.00           | 0.502     | 1.92               | 0.0710    | 0.728          | 0.0830    | 1.08         | 0.55      | 0.391                 | 0.116     | 0.745              | 0.376     |       |
| 10/11/2013 17:09     | 0913-111_A | 13_10_11_1709_32_195 | 1  | 2.23           | 0.512     | 1.90               | 0.0720    | 0.804          | 0.0800    | 1.08         | 0.55      | 0.386                 | 0.122     | 0.745              | 0.381     |       |
| 10/11/2013 17:10     | 0913-111_A | 13_10_11_1710_33_005 | 1  | 1.31           | 0.486     | 1.97               | 0.0720    | 0.773          | 0.0840    | 1.08         | 0.54      | 0.413                 | 0.120     | 0.745              | 0.367     |       |
| 10/11/2013 17:11     | 0913-111_A | 13_10_11_1711_33_755 | 1  | 1.00           | 0.508     | 1.88               | 0.0710    | 0.831          | 0.0820    | 1.08         | 0.55      | 0.424                 | 0.119     | 0.745              | 0.376     |       |
| 10/11/2013 17:12     | 0913-111_A | 13_10_11_1712_34_465 | 1  | 1.00           | 0.505     | 1.90               | 0.0780    | 0.738          | 0.0840    | 1.08         | 0.55      | 0.330                 | 0.122     | 0.745              | 0.386     |       |
| 10/11/2013 17:13     | 0913-111_A | 13_10_11_1713_35_276 | 1  | 1.00           | 0.500     | 2.00               | 0.0710    | 0.907          | 0.0810    | 1.08         | 0.55      | 0.293                 | 0.123     | 0.745              | 0.379     |       |
| 10/11/2013 17:14     | 0913-111_A | 13_10_11_1714_35_986 | 1  | 1.38           | 0.473     | 1.83               | 0.0720    | 0.748          | 0.0850    | 1.08         | 0.55      | 0.246                 | 0.121     | 0.745              | 0.353     |       |
| 10/11/2013 17:15     | 0913-111_A | 13_10_11_1715_36_786 | 1  | 1.31           | 0.511     | 1.91               | 0.0710    | 0.731          | 0.0840    | 1.08         | 0.55      | 0.343                 | 0.121     | 0.745              | 0.374     |       |
| 10/11/2013 17:16     | 0913-111_A | 13_10_11_1716_37_496 | 1  | 1.00           | 0.489     | 1.88               | 0.0690    | 0.854          | 0.0840    | 1.08         | 0.55      | 0.246                 | 0.122     | 0.745              | 0.359     |       |
| 10/11/2013 17:17     | 0913-111_A | 13_10_11_1717_38_286 | 1  | 1.29           | 0.469     | 1.87               | 0.0680    | 0.840          | 0.0850    | 1.08         | 0.55      | 0.323                 | 0.121     | 0.745              | 0.349     |       |
| 10/11/2013 17:18     | 0913-111_A | 13_10_11_1718_38_976 | 1  | 1.51           | 0.474     | 1.78               | 0.0710    | 0.830          | 0.0820    | 1.08         | 0.55      | 0.246                 | 0.123     | 0.745              | 0.351     |       |
| 10/11/2013 17:19     | 0913-111_A | 13_10_11_1719_39_786 | 1  | 1.22           | 0.511     | 1.79               | 0.0700    | 0.870          | 0.0840    | 1.08         | 0.55      | 0.285                 | 0.120     | 0.745              | 0.378     |       |
| 10/11/2013 17:20     | 0913-111_A | 13_10_11_1720_40_566 | 1  | 1.17           | 0.487     | 1.92               | 0.0710    | 0.727          | 0.0820    | 1.08         | 0.55      | 0.291                 | 0.120     | 0.745              | 0.369     |       |
| 10/11/2013 17:21     | 0913-111_A | 13_10_11_1721_41_276 | 1  | 1.00           | 0.507     | 1.97               | 0.0690    | 0.785          | 0.0820    | 1.08         | 0.55      | 0.257                 | 0.119     | 0.745              | 0.379     |       |
| 10/11/2013 17:22     | 0913-111_A | 13_10_11_1722_41_986 | 1  | 1.00           | 0.519     | 1.95               | 0.0720    | 0.778          | 0.0810    | 1.08         | 0.54      | 0.246                 | 0.127     | 0.745              | 0.381     |       |
| 10/11/2013 17:23     | 0913-111_A | 13_10_11_1723_42_806 | 1  | 1.00           | 0.487     | 1.85               | 0.0710    | 0.879          | 0.0840    | 1.08         | 0.54      | 0.326                 | 0.122     | 0.745              | 0.367     |       |
| 10/11/2013 17:24     | 0913-111_A | 13_10_11_1724_43_527 | 1  | 1.00           | 0.492     | 1.96               | 0.0720    | 0.858          | 0.0840    | 1.08         | 0.55      | 0.246                 | 0.123     | 0.745              | 0.367     |       |
| 10/11/2013 17:25     | 0913-111_A | 13_10_11_1725_44_267 | 1  | 1.00           | 0.493     | 1.93               | 0.0690    | 0.854          | 0.0840    | 1.08         | 0.55      | 0.403                 | 0.125     | 0.745              | 0.373     |       |
| 10/11/2013 17:26     | 0913-111_A | 13_10_11_1726_44_997 | 1  | 2.21           | 0.497     | 2.04               | 0.0710    | 0.849          | 0.0830    | 1.08         | 0.55      | 0.283                 | 0.124     | 0.745              | 0.375     |       |
| 10/11/2013 17:27     | 0913-111_A | 13_10_11_1727_45_747 | 1  | 1.92           | 0.492     | 1.89               | 0.0720    | 0.869          | 0.0830    | 1.08         | 0.55      | 0.246                 | 0.121     | 0.745              | 0.367     |       |
| 10/11/2013 17:28     | 0913-111_A | 13_10_11_1728_46_477 | 1  | 1.20           | 0.490     | 1.80               | 0.0750    | 0.814          | 0.0820    | 1.08         | 0.55      | 0.246                 | 0.122     | 0.787              | 0.367     |       |
| 10/11/2013 17:29     | 0913-111_A | 13_10_11_1729_47_207 | 1  | 1.25           | 0.504     | 1.95               | 0.0720    | 0.843          | 0.0820    | 1.08         | 0.55      | 0.302                 | 0.124     | 0.745              | 0.380     |       |
| Average Conc. (ppm): |            |                      |    | 1              | 1.33      | 0.507              | 1.84      | 0.0732         | 0.844     | 0.0844       | 1.09      | 0.55                  | 0.359     | 0.124              | 0.786     | 0.378 |

#### Hammermill 2 Run 1

| Date | Method | Filename | DF | Acrolein (ppm) | SEC (ppm) | Formaldehyde (ppm) | SEC (ppm) | Methanol (ppm) | SEC (ppm) | Phenol (ppm) | SEC (pp |
|------|--------|----------|----|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|---------|
|------|--------|----------|----|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|---------|

|                  |                |
|------------------|----------------|
| Company          | ACT            |
| Analyst Initials | CJT            |
| Parameters       | EPA Method 320 |
| # Samples        | 21 Runs        |

|             |                      |
|-------------|----------------------|
| Client #    | 1911                 |
| Job #       | 0913-111             |
| PO #        | 3134 1911            |
| Report Date | VO.62 13.10.18.12.58 |

#### Hammermill 2 Run 2

| Date             | Method     | Filename             | DF | Acrolein (ppm) | SEC (ppm) | Formaldehyde (ppm) | SEC (ppm) | Methanol (ppm) | SEC (ppm) | Phenol (ppm) | SEC (ppm) | Propionaldehyde (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) |
|------------------|------------|----------------------|----|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|-----------|-----------------------|-----------|--------------------|-----------|
| 10/11/2013 19:35 | 0913-111.1 | 13_10_11_1935_01_714 | 1  | 1.03           | 0.455     | 0.387              | 0.0660    | 0.165          | 0.0760    | 1.08         | 0.52      | 0.232                 | 0.107     | 0.707              | 0.335     |
| 10/11/2013 19:36 | 0913-111.1 | 13_10_11_1936_02_534 | 1  | 0.965          | 0.465     | 0.476              | 0.0620    | 0.184          | 0.0770    | 1.08         | 0.52      | 0.232                 | 0.104     | 0.707              | 0.343     |
| 10/11/2013 19:37 | 0913-111.1 | 13_10_11_1937_03_234 | 1  | 0.965          | 0.466     | 0.569              | 0.0660    | 0.165          | 0.0770    | 1.08         | 0.52      | 0.232                 | 0.107     | 0.707              | 0.343     |
| 10/11/2013 19:38 | 0913-111.1 | 13_10_11_1938_03_964 | 1  | 0.965          | 0.470     | 0.688              | 0.0660    | 0.165          | 0.0800    | 1.08         | 0.53      | 0.232                 | 0.110     | 0.707              | 0.348     |
| 10/11/2013 19:39 | 0913-111.1 | 13_10_11_1939_04_744 | 1  | 0.965          | 0.468     | 0.608              | 0.0660    | 0.165          | 0.0810    | 1.08         | 0.53      | 0.232                 | 0.108     | 0.731              | 0.346     |
| 10/11/2013 19:40 | 0913-111.1 | 13_10_11_1940_05_514 | 1  | 0.965          | 0.483     | 0.569              | 0.0660    | 0.203          | 0.0800    | 1.08         | 0.54      | 0.232                 | 0.109     | 0.707              | 0.360     |
| 10/11/2013 19:41 | 0913-111.1 | 13_10_11_1941_06_114 | 1  | 0.965          | 0.470     | 0.710              | 0.0620    | 0.168          | 0.0850    | 1.08         | 0.55      | 0.232                 | 0.104     | 0.707              | 0.343     |
| 10/11/2013 19:42 | 0913-111.1 | 13_10_11_1942_06_924 | 1  | 0.965          | 0.504     | 0.659              | 0.0670    | 0.169          | 0.0830    | 1.08         | 0.55      | 0.232                 | 0.114     | 0.707              | 0.369     |
| 10/11/2013 19:43 | 0913-111.1 | 13_10_11_1943_07_674 | 1  | 0.965          | 0.502     | 0.739              | 0.0700    | 0.180          | 0.0860    | 1.08         | 0.55      | 0.232                 | 0.117     | 0.707              | 0.369     |
| 10/11/2013 19:44 | 0913-111.1 | 13_10_11_1944_08_385 | 1  | 0.965          | 0.467     | 0.816              | 0.0680    | 0.184          | 0.0850    | 1.08         | 0.55      | 0.232                 | 0.114     | 0.707              | 0.355     |
| 10/11/2013 19:45 | 0913-111.1 | 13_10_11_1945_09_195 | 1  | 0.965          | 0.496     | 0.955              | 0.0730    | 0.189          | 0.0880    | 1.08         | 0.56      | 0.232                 | 0.123     | 0.707              | 0.368     |
| 10/11/2013 19:46 | 0913-111.1 | 13_10_11_1946_09_915 | 1  | 0.965          | 0.512     | 1.22               | 0.0740    | 0.178          | 0.0880    | 1.08         | 0.57      | 0.233                 | 0.127     | 0.707              | 0.375     |
| 10/11/2013 19:47 | 0913-111.1 | 13_10_11_1947_10_665 | 1  | 0.965          | 0.505     | 1.29               | 0.0720    | 0.175          | 0.0860    | 1.08         | 0.56      | 0.232                 | 0.122     | 0.707              | 0.372     |
| 10/11/2013 19:48 | 0913-111.1 | 13_10_11_1948_11_485 | 1  | 0.965          | 0.487     | 1.11               | 0.0670    | 0.165          | 0.0830    | 1.08         | 0.55      | 0.232                 | 0.113     | 0.707              | 0.357     |
| 10/11/2013 19:49 | 0913-111.1 | 13_10_11_1949_12_195 | 1  | 0.965          | 0.492     | 1.06               | 0.0700    | 0.165          | 0.0840    | 1.08         | 0.55      | 0.232                 | 0.114     | 0.707              | 0.359     |
| 10/11/2013 19:50 | 0913-111.1 | 13_10_11_1950_12_945 | 1  | 0.965          | 0.480     | 1.14               | 0.0660    | 0.165          | 0.0840    | 1.08         | 0.55      | 0.232                 | 0.107     | 0.707              | 0.337     |
| 10/11/2013 19:51 | 0913-111.1 | 13_10_11_1951_13_755 | 1  | 0.965          | 0.462     | 1.17               | 0.0650    | 0.165          | 0.0830    | 1.08         | 0.55      | 0.271                 | 0.106     | 0.707              | 0.339     |
| 10/11/2013 19:52 | 0913-111.1 | 13_10_11_1952_14_475 | 1  | 0.965          | 0.501     | 1.09               | 0.0680    | 0.165          | 0.0840    | 1.08         | 0.55      | 0.232                 | 0.114     | 0.707              | 0.363     |
| 10/11/2013 19:53 | 0913-111.1 | 13_10_11_1953_15_195 | 1  | 0.965          | 0.453     | 0.918              | 0.0660    | 0.165          | 0.0820    | 1.08         | 0.55      | 0.238                 | 0.109     | 0.707              | 0.338     |
| 10/11/2013 19:54 | 0913-111.1 | 13_10_11_1954_16_015 | 1  | 1.16           | 0.466     | 0.745              | 0.0620    | 0.165          | 0.0840    | 1.08         | 0.55      | 0.236                 | 0.110     | 0.707              | 0.342     |
| 10/11/2013 19:55 | 0913-111.1 | 13_10_11_1955_16_735 | 1  | 0.965          | 0.484     | 0.645              | 0.0670    | 0.186          | 0.0830    | 1.08         | 0.55      | 0.274                 | 0.109     | 0.707              | 0.364     |
| 10/11/2013 19:56 | 0913-111.1 | 13_10_11_1956_17_546 | 1  | 0.965          | 0.477     | 0.739              | 0.0700    | 0.167          | 0.0870    | 1.08         | 0.55      | 0.232                 | 0.114     | 0.707              | 0.351     |
| 10/11/2013 19:57 | 0913-111.1 | 13_10_11_1957_18_266 | 1  | 0.965          | 0.484     | 0.834              | 0.0700    | 0.165          | 0.0830    | 1.08         | 0.55      | 0.232                 | 0.114     | 0.707              | 0.355     |
| 10/11/2013 19:58 | 0913-111.1 | 13_10_11_1958_18_986 | 1  | 0.965          | 0.497     | 0.781              | 0.0660    | 0.197          | 0.0890    | 1.08         | 0.56      | 0.303                 | 0.114     | 0.707              | 0.361     |
| 10/11/2013 19:59 | 0913-111.1 | 13_10_11_1959_19_796 | 1  | 0.965          | 0.495     | 0.968              | 0.0700    | 0.165          | 0.0870    | 1.08         | 0.56      | 0.232                 | 0.116     | 0.707              | 0.364     |
| 10/11/2013 20:00 | 0913-111.1 | 13_10_11_2000_20_526 | 1  | 0.965          | 0.485     | 1.18               | 0.0670    | 0.185          | 0.0840    | 1.08         | 0.55      | 0.232                 | 0.115     | 0.707              | 0.358     |
| 10/11/2013 20:01 | 0913-111.1 | 13_10_11_2001_21_306 | 1  | 0.965          | 0.486     | 0.996              | 0.0660    | 0.282          | 0.0820    | 1.08         | 0.55      | 0.232                 | 0.114     | 0.707              | 0.365     |
| 10/11/2013 20:02 | 0913-111.1 | 13_10_11_2002_22_056 | 1  | 0.965          | 0.470     | 1.20               | 0.0710    | 0.297          | 0.0870    | 1.08         | 0.56      | 0.232                 | 0.117     | 0.707              | 0.346     |
| 10/11/2013 20:03 | 0913-111.1 | 13_10_11_2003_22_766 | 1  | 0.965          | 0.503     | 1.15               | 0.0730    | 0.296          | 0.0870    | 1.08         | 0.56      | 0.232                 | 0.120     | 0.707              | 0.362     |
| 10/11/2013 20:04 | 0913-111.1 | 13_10_11_2004_23_566 | 1  | 0.965          | 0.479     | 1.32               | 0.0720    | 0.287          | 0.0860    | 1.08         | 0.52      | 0.232                 | 0.119     | 0.707              | 0.362     |
| 10/11/2013 20:05 | 0913-111.1 | 13_10_11_2005_24_316 | 1  | 0.965          | 0.499     | 1.31               | 0.0720    | 0.247          | 0.0900    | 1.08         | 0.56      | 0.232                 | 0.121     | 0.707              | 0.366     |
| 10/11/2013 20:06 | 0913-111.1 | 13_10_11_2006_25_026 | 1  | 0.965          | 0.479     | 1.24               | 0.0670    | 0.289          | 0.0850    | 1.08         | 0.55      | 0.232                 | 0.116     | 0.707              | 0.351     |
| 10/11/2013 20:07 | 0913-111.1 | 13_10_11_2007_25_847 | 1  | 0.965          | 0.471     | 1.50               | 0.0680    | 0.281          | 0.0840    | 1.08         | 0.55      | 0.290                 | 0.113     | 0.707              | 0.340     |
| 10/11/2013 20:08 | 0913-111.1 | 13_10_11_2008_26_547 | 1  | 1.29           | 0.496     | 1.77               | 0.0710    | 0.381          | 0.0840    | 1.08         | 0.55      | 0.232                 | 0.121     | 0.707              | 0.363     |
| 10/11/2013 20:09 | 0913-111.1 | 13_10_11_2009_27_317 | 1  | 0.965          | 0.479     | 1.68               | 0.0690    | 0.323          | 0.0850    | 1.08         | 0.56      | 0.232                 | 0.117     | 0.707              | 0.348     |
| 10/11/2013 20:10 | 0913-111.1 | 13_10_11_2010_28_067 | 1  | 0.965          | 0.515     | 2.01               | 0.0720    | 0.308          | 0.0860    | 1.08         | 0.56      | 0.232                 | 0.127     | 0.846              | 0.373     |
| 10/11/2013 20:11 | 0913-111.1 | 13_10_11_2011_28_787 | 1  | 0.965          | 0.467     | 2.07               | 0.0680    | 0.318          | 0.0880    | 1.08         | 0.55      | 0.383                 | 0.118     | 0.707              | 0.342     |
| 10/11/2013 20:12 | 0913-111.1 | 13_10_11_2012_29_547 | 1  | 0.965          | 0.517     | 1.95               | 0.0770    | 0.304          | 0.0860    | 1.08         | 0.55      | 0.371                 | 0.121     | 0.707              | 0.378     |
| 10/11/2013 20:13 | 0913-111.1 | 13_10_11_2013_30_317 | 1  | 0.965          | 0.479     | 1.47               | 0.0700    | 0.284          | 0.0860    | 1.08         | 0.55      | 0.232                 | 0.119     | 0.707              | 0.352     |
| 10/11/2013 20:14 | 0913-111.1 | 13_10_11_2014_31_027 | 1  | 0.965          | 0.486     | 1.48               | 0.0700    | 0.165          | 0.0830    | 1.08         | 0.55      | 0.341                 | 0.117     | 0.707              | 0.352     |
| 10/11/2013 20:15 | 0913-111.1 | 13_10_11_2015_31_827 | 1  | 0.965          | 0.502     | 1.42               | 0.0710    | 0.200          | 0.0840    | 1.08         | 0.55      | 0.232                 | 0.117     | 0.707              | 0.366     |
| 10/11/2013 20:16 | 0913-111.1 | 13_10_11_2016_32_537 | 1  | 0.965          | 0.474     | 1.60               | 0.0660    | 0.218          | 0.0860    | 1.08         | 0.55      | 0.232                 | 0.115     | 0.707              | 0.349     |
| 10/11/2013 20:17 | 0913-111.1 | 13_10_11_2017_33_357 | 1  | 0.965          | 0.473     | 1.54               | 0.0690    | 0.244          | 0.0860    | 1.08         | 0.56      | 0.232                 | 0.120     | 0.707              | 0.345     |
| 10/11/2013 20:18 | 0913-111.1 | 13_10_11_2018_34_067 | 1  | 0.965          | 0.483     | 1.79               | 0.0720    | 0.207          | 0.0840    | 1.08         | 0.55      | 0.232                 | 0.118     | 0.707              | 0.353     |
| 10/11/2013 20:19 | 0913-111.1 | 13_10_11_2019_34_828 | 1  | 0.965          | 0.441     | 1.32               | 0.0570    | 0.231          | 0.0810    | 1.08         | 0.54      | 0.232                 | 0.107     | 0.707              | 0.319     |
| 10/11/2013 20:20 | 0913-111.1 | 13_10_11_2020_35_678 | 1  | 0.965          | 0.409     | 0.893              | 0.0620    | 0.237          | 0.0790    | 1.08         | 0.53      | 0.232                 | 0.100     | 0.707              | 0.303     |
| 10/11/2013 20:21 | 0913-111.1 | 13_10_11_2021_36_418 | 1  | 0.965          | 0.433     | 0.967              | 0.0620    | 0.202          | 0.0750    | 1.08         | 0.53      | 0.232                 | 0.103     | 0.707              | 0.318     |
| 10/11/2013 20:22 | 0913-111.1 | 13_10_11_2022_37_128 | 1  | 0.965          | 0.461     | 1.19               | 0.0620    | 0.227          | 0.0830    | 1.08         | 0.54      | 0.232                 | 0.114     | 0.707              | 0.338     |
| 10/11/2013 20:23 | 0913-111.1 | 13_10_11_2023_37_728 | 1  | 0.965          | 0.479     | 1.36               | 0.0660    | 0.198          | 0.0870    | 1.08         | 0.56      | 0.232                 | 0.119     | 0.707              | 0.351     |
| 10/11/2013 20:24 | 0913-111.1 | 13_10_11_2024_38_578 | 1  | 0.965          | 0.483     | 1.45               | 0.0680    | 0.184          | 0.0860    | 1.08         | 0.56      | 0.232                 | 0.124     | 0.707              | 0.352     |
| 10/11/2013 20:25 | 0913-111.1 | 13_10_11_2025_39_308 | 1  | 0.965          | 0.491     | 1.36               | 0.0700    | 0.239          | 0.0850    | 1.08         | 0.56      | 0.232                 | 0.121     | 0.707              | 0.360     |
| 10/11/2013 20:26 | 0913-111.1 | 13_10_11_2026_40_038 | 1  | 0.965          | 0.466     | 1.27               | 0.0680    | 0.182          | 0.0850    | 1.08         | 0.56      | 0.232                 | 0.116     | 0.707              | 0.341     |
| 10/11/2013 20:27 | 0913-111.1 | 13_10_11_2027_40_768 | 1  | 0.965          | 0.484     | 1.15               | 0.0670    | 0.191          | 0.0860    | 1.08         | 0.55      | 0.232                 | 0.115     | 0.707              | 0.356     |
| 10/11/2013 20:28 | 0913-111.1 | 13_10_11_2028_41_548 | 1  | 0.965          | 0.493     | 1.23               | 0.0660    | 0.243          | 0.0850    | 1.08         | 0.55      | 0.232                 | 0.114     | 0.707              | 0.359     |
| 10/11/2013 20:29 | 0913-111.1 | 13_10_11_2029_42_348 | 1  | 0.965          | 0.477     | 0.973              | 0.0670    | 0.171          | 0.0860    | 1.08         | 0.55      | 0.232                 | 0.113     | 0.707              | 0.350     |
| 10/11/2013 20:30 | 0913-111.1 | 13_10_11_2030_43_068 | 1  | 0.965          | 0.474     | 0.997              | 0.0660    | 0.165          | 0.0850    | 1.08         | 0.55      | 0.232                 | 0.111     | 0.707              | 0.344     |
| 10/11/2013 20:31 | 0913-111.1 | 13_10_11_2031_43_868 | 1  | 0.965          | 0.483     | 1.05               | 0.0660    | 0.201          | 0.0840    | 1.08         | 0.55      | 0.232                 | 0.114     | 0.707              | 0.355     |
| 10/11/2013 20:32 | 0913-111.1 | 13_10_11_2032_44_619 | 1  | 0.965          | 0.493     | 1.57               | 0.0710    | 0.253          | 0.0850    | 1.08         | 0.56      | 0.232                 | 0.122     | 0.707              | 0.360     |
| 10/11/2013 20:33 | 0913-111.1 | 13_10_11_2033_45_359 | 1  | 0.965          | 0.463     | 1.44               | 0.0670    | 0.165          | 0.0840    | 1.08         | 0.55      | 0.232                 | 0.111     | 0.707              | 0.342     |
| 10/11/2013 20:34 | 0913-111.1 | 13_10_11_2034_46_079 | 1  | 0.965          | 0.450     | 0.598              | 0.0670    | 0.165          | 0.0680    | 1.08         | 0.46      | 0.232                 | 0.172     | 0.707              | 0.331     |
| 10/11/2013 20:35 | 0913       |                      |    |                |           |                    |           |                |           |              |           |                       |           |                    |           |

|                  |                |
|------------------|----------------|
| Company          | ACT            |
| Analyst Initials | CJT            |
| Parameters       | EPA Method 320 |
| # Samples        | 21 Runs        |

|             |                      |
|-------------|----------------------|
| Client #    | 1911                 |
| Job #       | 0913-111             |
| PO #        | 3134 1911            |
| Report Date | VO.62 13.10.18.12.58 |

**Pellet Cooler 1 Run 1**

| Date                 | Method     | Filename             | DF | Acrolein (ppm) | SEC (ppm) | Formaldehyde (ppm) | SEC (ppm) | Methanol (ppm) | SEC (ppm) | Phenol (ppm) | SEC (ppm) | Propionaldehyde (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) |       |
|----------------------|------------|----------------------|----|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|-----------|-----------------------|-----------|--------------------|-----------|-------|
| 10/12/2013 8:58      | 0913-111_A | 13_10_12_0858_54_250 | 1  | 0.931          | 0.473     | 1.38               | 0.0630    | 0.373          | 0.0710    | 0.98         | 0.49      | 0.236                 | 0.114     | 0.686              | 0.343     |       |
| 10/12/2013 8:59      | 0913-111_A | 13_10_12_0859_55_060 | 1  | 0.931          | 0.451     | 1.43               | 0.0630    | 0.416          | 0.0730    | 0.98         | 0.49      | 0.297                 | 0.113     | 0.686              | 0.332     |       |
| 10/12/2013 9:00      | 0913-111_A | 13_10_12_0900_55_760 | 1  | 0.931          | 0.474     | 1.46               | 0.0650    | 0.440          | 0.0700    | 0.96         | 0.49      | 0.291                 | 0.120     | 0.686              | 0.351     |       |
| 10/12/2013 9:01      | 0913-111_A | 13_10_12_0901_56_540 | 1  | 0.931          | 0.443     | 1.56               | 0.0630    | 0.413          | 0.0710    | 0.98         | 0.49      | 0.337                 | 0.114     | 0.686              | 0.327     |       |
| 10/12/2013 9:02      | 0913-111_A | 13_10_12_0902_57_240 | 1  | 1.05           | 0.458     | 1.42               | 0.0670    | 0.487          | 0.0710    | 0.98         | 0.49      | 0.293                 | 0.115     | 0.686              | 0.344     |       |
| 10/12/2013 9:03      | 0913-111_A | 13_10_12_0903_58_000 | 1  | 0.931          | 0.447     | 1.38               | 0.0610    | 0.431          | 0.0700    | 0.98         | 0.49      | 0.236                 | 0.109     | 0.686              | 0.328     |       |
| 10/12/2013 9:04      | 0913-111_A | 13_10_12_0904_58_810 | 1  | 0.931          | 0.487     | 1.32               | 0.0660    | 0.495          | 0.0740    | 0.98         | 0.49      | 0.337                 | 0.116     | 0.686              | 0.352     |       |
| 10/12/2013 9:05      | 0913-111_A | 13_10_12_0905_59_520 | 1  | 1.20           | 0.480     | 1.26               | 0.0650    | 0.496          | 0.0700    | 0.98         | 0.49      | 0.236                 | 0.116     | 0.686              | 0.351     |       |
| 10/12/2013 9:07      | 0913-111_A | 13_10_12_0907_00_280 | 1  | 0.931          | 0.462     | 1.41               | 0.0670    | 0.543          | 0.0710    | 0.98         | 0.49      | 0.236                 | 0.119     | 0.686              | 0.339     |       |
| 10/12/2013 9:08      | 0913-111_A | 13_10_12_0908_01_061 | 1  | 0.931          | 0.477     | 1.50               | 0.0680    | 0.496          | 0.0700    | 0.98         | 0.50      | 0.340                 | 0.116     | 0.686              | 0.352     |       |
| 10/12/2013 9:09      | 0913-111_A | 13_10_12_0909_01_771 | 1  | 0.931          | 0.449     | 1.53               | 0.0590    | 0.483          | 0.0700    | 0.98         | 0.50      | 0.373                 | 0.112     | 0.686              | 0.330     |       |
| 10/12/2013 9:10      | 0913-111_A | 13_10_12_0910_02_801 | 1  | 0.931          | 0.449     | 1.50               | 0.0610    | 0.450          | 0.0720    | 0.98         | 0.50      | 0.236                 | 0.114     | 0.686              | 0.320     |       |
| 10/12/2013 9:11      | 0913-111_A | 13_10_12_0911_03_351 | 1  | 0.931          | 0.460     | 1.49               | 0.0630    | 0.502          | 0.0740    | 0.98         | 0.50      | 0.236                 | 0.111     | 0.686              | 0.335     |       |
| 10/12/2013 9:12      | 0913-111_A | 13_10_12_0912_04_061 | 1  | 0.931          | 0.461     | 1.45               | 0.0640    | 0.553          | 0.0740    | 0.98         | 0.50      | 0.236                 | 0.115     | 0.686              | 0.337     |       |
| 10/12/2013 9:13      | 0913-111_A | 13_10_12_0913_04_821 | 1  | 0.931          | 0.456     | 1.51               | 0.0650    | 0.543          | 0.0740    | 0.98         | 0.50      | 0.344                 | 0.115     | 0.686              | 0.338     |       |
| 10/12/2013 9:14      | 0913-111_A | 13_10_12_0914_05_631 | 1  | 1.19           | 0.466     | 1.48               | 0.0630    | 0.513          | 0.0750    | 0.98         | 0.50      | 0.306                 | 0.115     | 0.686              | 0.344     |       |
| 10/12/2013 9:15      | 0913-111_A | 13_10_12_0915_06_381 | 1  | 0.931          | 0.477     | 1.43               | 0.0640    | 0.522          | 0.0720    | 0.98         | 0.50      | 0.442                 | 0.115     | 0.686              | 0.353     |       |
| 10/12/2013 9:16      | 0913-111_A | 13_10_12_0916_06_991 | 1  | 0.931          | 0.459     | 1.47               | 0.0640    | 0.464          | 0.0710    | 0.98         | 0.50      | 0.425                 | 0.114     | 0.686              | 0.337     |       |
| 10/12/2013 9:17      | 0913-111_A | 13_10_12_0917_07_721 | 1  | 0.931          | 0.443     | 1.52               | 0.0700    | 0.624          | 0.0720    | 0.98         | 0.50      | 0.242                 | 0.122     | 0.686              | 0.320     |       |
| 10/12/2013 9:18      | 0913-111_A | 13_10_12_0918_08_531 | 1  | 0.931          | 0.470     | 1.47               | 0.0660    | 0.615          | 0.0720    | 0.98         | 0.51      | 0.257                 | 0.117     | 0.686              | 0.345     |       |
| 10/12/2013 9:19      | 0913-111_A | 13_10_12_0919_09_252 | 1  | 0.931          | 0.465     | 1.69               | 0.0640    | 0.591          | 0.0740    | 0.98         | 0.51      | 0.527                 | 0.119     | 0.686              | 0.352     |       |
| 10/12/2013 9:20      | 0913-111_A | 13_10_12_0920_09_962 | 1  | 0.931          | 0.473     | 1.50               | 0.0650    | 0.545          | 0.0740    | 0.98         | 0.51      | 0.342                 | 0.122     | 0.686              | 0.343     |       |
| 10/12/2013 9:21      | 0913-111_A | 13_10_12_0921_10_712 | 1  | 0.931          | 0.490     | 1.63               | 0.0620    | 0.634          | 0.0770    | 0.98         | 0.51      | 0.497                 | 0.117     | 0.686              | 0.354     |       |
| 10/12/2013 9:22      | 0913-111_A | 13_10_12_0922_11_562 | 1  | 0.931          | 0.487     | 1.54               | 0.0700    | 0.574          | 0.0750    | 0.98         | 0.51      | 0.356                 | 0.123     | 0.686              | 0.368     |       |
| 10/12/2013 9:23      | 0913-111_A | 13_10_12_0923_12_282 | 1  | 0.931          | 0.461     | 1.52               | 0.0610    | 0.620          | 0.0750    | 0.98         | 0.51      | 0.525                 | 0.114     | 0.686              | 0.340     |       |
| 10/12/2013 9:24      | 0913-111_A | 13_10_12_0924_13_082 | 1  | 1.31           | 0.472     | 1.51               | 0.0640    | 0.608          | 0.0730    | 0.98         | 0.51      | 0.505                 | 0.120     | 0.686              | 0.344     |       |
| 10/12/2013 9:25      | 0913-111_A | 13_10_12_0925_13_802 | 1  | 0.931          | 0.471     | 1.50               | 0.0670    | 0.601          | 0.0760    | 0.98         | 0.51      | 0.292                 | 0.118     | 0.686              | 0.348     |       |
| 10/12/2013 9:26      | 0913-111_A | 13_10_12_0926_14_512 | 1  | 1.14           | 0.468     | 1.44               | 0.0680    | 0.691          | 0.0760    | 0.98         | 0.51      | 0.291                 | 0.121     | 0.686              | 0.340     |       |
| 10/12/2013 9:27      | 0913-111_A | 13_10_12_0927_15_282 | 1  | 0.931          | 0.471     | 1.41               | 0.0640    | 0.516          | 0.0740    | 0.98         | 0.51      | 0.320                 | 0.113     | 0.686              | 0.345     |       |
| 10/12/2013 9:28      | 0913-111_A | 13_10_12_0928_16_054 | 1  | 0.931          | 0.457     | 1.51               | 0.0630    | 0.548          | 0.0750    | 0.98         | 0.51      | 0.326                 | 0.117     | 0.686              | 0.333     |       |
| 10/12/2013 9:29      | 0913-111_A | 13_10_12_0929_16_802 | 1  | 0.931          | 0.486     | 1.43               | 0.0660    | 0.505          | 0.0760    | 0.98         | 0.51      | 0.391                 | 0.117     | 0.686              | 0.353     |       |
| 10/12/2013 9:30      | 0913-111_A | 13_10_12_0930_17_552 | 1  | 0.931          | 0.475     | 1.50               | 0.0670    | 0.570          | 0.0750    | 0.98         | 0.51      | 0.236                 | 0.122     | 0.686              | 0.355     |       |
| 10/12/2013 9:31      | 0913-111_A | 13_10_12_0931_18_263 | 1  | 0.931          | 0.487     | 1.54               | 0.0660    | 0.600          | 0.0740    | 0.98         | 0.51      | 0.412                 | 0.116     | 0.686              | 0.358     |       |
| 10/12/2013 9:32      | 0913-111_A | 13_10_12_0932_19_013 | 1  | 0.931          | 0.471     | 1.39               | 0.0660    | 0.511          | 0.0750    | 0.98         | 0.51      | 0.348                 | 0.124     | 0.686              | 0.351     |       |
| 10/12/2013 9:33      | 0913-111_A | 13_10_12_0933_19_773 | 1  | 0.931          | 0.483     | 1.61               | 0.0650    | 0.626          | 0.0750    | 0.98         | 0.51      | 0.520                 | 0.124     | 0.686              | 0.361     |       |
| 10/12/2013 9:34      | 0913-111_A | 13_10_12_0934_20_553 | 1  | 0.931          | 0.465     | 1.51               | 0.0660    | 0.585          | 0.0770    | 0.98         | 0.52      | 0.476                 | 0.123     | 0.686              | 0.340     |       |
| 10/12/2013 9:35      | 0913-111_A | 13_10_12_0935_21_313 | 1  | 1.44           | 0.491     | 1.53               | 0.0690    | 0.690          | 0.0760    | 0.98         | 0.51      | 0.475                 | 0.131     | 0.686              | 0.358     |       |
| 10/12/2013 9:36      | 0913-111_A | 13_10_12_0936_22_033 | 1  | 1.06           | 0.466     | 1.49               | 0.0620    | 0.596          | 0.0800    | 0.98         | 0.51      | 0.642                 | 0.122     | 0.686              | 0.342     |       |
| 10/12/2013 9:37      | 0913-111_A | 13_10_12_0937_22_823 | 1  | 0.931          | 0.481     | 1.42               | 0.0670    | 0.561          | 0.0760    | 1.01         | 0.51      | 0.370                 | 0.121     | 0.686              | 0.352     |       |
| 10/12/2013 9:38      | 0913-111_A | 13_10_12_0938_23_533 | 1  | 0.931          | 0.478     | 1.39               | 0.0630    | 0.543          | 0.0780    | 0.99         | 0.51      | 0.519                 | 0.118     | 0.686              | 0.346     |       |
| 10/12/2013 9:39      | 0913-111_A | 13_10_12_0939_24_263 | 1  | 0.931          | 0.469     | 1.38               | 0.0640    | 0.609          | 0.0770    | 1.02         | 0.51      | 0.450                 | 0.115     | 0.686              | 0.348     |       |
| 10/12/2013 9:40      | 0913-111_A | 13_10_12_0940_25_023 | 1  | 1.13           | 0.476     | 1.39               | 0.0620    | 0.507          | 0.0740    | 1.03         | 0.51      | 0.558                 | 0.118     | 0.686              | 0.346     |       |
| 10/12/2013 9:41      | 0913-111_A | 13_10_12_0941_25_743 | 1  | 0.931          | 0.468     | 1.27               | 0.0630    | 0.612          | 0.0720    | 0.98         | 0.51      | 0.236                 | 0.114     | 0.686              | 0.344     |       |
| 10/12/2013 9:42      | 0913-111_A | 13_10_12_0942_26_543 | 1  | 0.931          | 0.475     | 1.36               | 0.0640    | 0.560          | 0.0760    | 0.98         | 0.51      | 0.480                 | 0.125     | 0.686              | 0.355     |       |
| 10/12/2013 9:43      | 0913-111_A | 13_10_12_0943_27_234 | 1  | 0.931          | 0.448     | 1.37               | 0.0660    | 0.502          | 0.0720    | 1.00         | 0.50      | 0.439                 | 0.114     | 0.686              | 0.328     |       |
| 10/12/2013 9:44      | 0913-111_A | 13_10_12_0944_27_984 | 1  | 0.931          | 0.464     | 1.48               | 0.0660    | 0.512          | 0.0710    | 0.98         | 0.51      | 0.486                 | 0.118     | 0.686              | 0.343     |       |
| 10/12/2013 9:45      | 0913-111_A | 13_10_12_0945_28_774 | 1  | 0.931          | 0.428     | 1.37               | 0.0610    | 0.502          | 0.0740    | 0.99         | 0.50      | 0.423                 | 0.110     | 0.686              | 0.324     |       |
| 10/12/2013 9:46      | 0913-111_A | 13_10_12_0946_29_524 | 1  | 0.931          | 0.459     | 1.30               | 0.0680    | 0.516          | 0.0730    | 1.05         | 0.51      | 0.351                 | 0.121     | 0.686              | 0.358     |       |
| 10/12/2013 9:47      | 0913-111_A | 13_10_12_0947_30_304 | 1  | 0.931          | 0.472     | 1.32               | 0.0640    | 0.497          | 0.0750    | 1.05         | 0.51      | 0.241                 | 0.116     | 0.686              | 0.344     |       |
| 10/12/2013 9:48      | 0913-111_A | 13_10_12_0948_30_974 | 1  | 1.12           | 0.487     | 1.27               | 0.0640    | 0.502          | 0.0750    | 1.03         | 0.51      | 0.405                 | 0.117     | 0.686              | 0.359     |       |
| 10/12/2013 9:49      | 0913-111_A | 13_10_12_0949_31_774 | 1  | 1.09           | 0.461     | 1.47               | 0.0600    | 0.528          | 0.0730    | 1.08         | 0.51      | 0.525                 | 0.113     | 0.686              | 0.335     |       |
| 10/12/2013 9:50      | 0913-111_A | 13_10_12_0950_32_484 | 1  | 0.931          | 0.453     | 1.26               | 0.0650    | 0.505          | 0.0750    | 1.06         | 0.51      | 0.348                 | 0.117     | 0.686              | 0.329     |       |
| 10/12/2013 9:51      | 0913-111_A | 13_10_12_0951_33_294 | 1  | 0.931          | 0.471     | 1.34               | 0.0680    | 0.571          | 0.0720    | 1.09         | 0.51      | 0.369                 | 0.117     | 0.686              | 0.351     |       |
| 10/12/2013 9:52      | 0913-111_A | 13_10_12_0952_34_074 | 1  | 1.20           | 0.470     | 1.30               | 0.0610    | 0.563          | 0.0730    | 1.09         | 0.51      | 0.402                 | 0.120     | 0.686              | 0.346     |       |
| 10/12/2013 9:53      | 0913-111_A | 13_10_12_0953_34_794 | 1  | 0.931          | 0.463     | 1.37               | 0.0630    | 0.527          | 0.0740    | 1.02         | 0.51      | 0.565                 | 0.118     | 0.686              | 0.343     |       |
| 10/12/2013 9:54      | 0913-111_A | 13_10_12_0954_35_514 | 1  | 0.931          | 0.477     | 1.41               | 0.0690    | 0.563          | 0.0720    | 1.03         | 0.51      | 0.236                 | 0.123     | 0.686              | 0.352     |       |
| 10/12/2013 9:55      | 0913-111_A | 13_10_12_0955_36_235 | 1  | 0.931          | 0.459     | 1.41               | 0.0630    | 0.538          | 0.0730    | 1.07         | 0.51      | 0.465                 | 0.116     | 0.686              | 0.337     |       |
| 10/12/2013 9:56      | 0913-111_A | 13_10_12_0956_36_955 | 1  | 0.931          | 0.446     | 1.33               | 0.0620    | 0.538          | 0.0760    | 1.09         | 0.51      | 0.573                 | 0.115     | 0.686              | 0.328     |       |
| 10/12/2013 9:57      | 0913-111_A | 13_10_12_0957_37_745 | 1  | 0.931          | 0.464     | 1.46               | 0.0640    | 0.523          | 0.0750    | 1.08         | 0.51      | 0.516                 | 0.119     | 0.686              | 0.345     |       |
| 10/12/2013 9:58      | 0913-111_A | 13_10_12_0958_38_355 | 1  | 0.931          | 0.450     | 1.36               | 0.0650    | 0.534          | 0.0750    | 1.10         | 0.51      | 0.448                 | 0.121     | 0.686              | 0.330     |       |
| Average Conc. (ppm): |            |                      |    | 1              | 0.976     | 0.467              | 1.44      | 0.0646         | 0.537     | 0.0738       | 1.00      | 0.50                  | 0.381     | 0.118              | 0.691     | 0.344 |

**Pellet Cooler 1 Run 2**

| Date             | Method     | Filename             | DF | Acrolein (ppm) | SEC (ppm) | Formaldehyde (ppm) | SEC (ppm) | Methanol (ppm) | SEC (ppm) | Phenol (ppm) | SEC (ppm) | Propionaldehyde (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) |
|------------------|------------|----------------------|----|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|-----------|-----------------------|-----------|--------------------|-----------|
| 10/12/2013 10:22 | 0913-111_A | 13_10_12_1022_56_297 | 1  | 0.931          | 0.480     | 1.36               | 0.0680    | 0.307          | 0.0760    | 0.98         | 0.51      |                       |           |                    |           |









|                  |                |
|------------------|----------------|
| Company          | ACT            |
| Analyst Initials | CJT            |
| Parameters       | EPA Method 320 |
| # Samples        | 21 Runs        |

|             |                      |
|-------------|----------------------|
| Client #    | 1911                 |
| Job #       | 0913-111             |
| PO #        | 3134 1911            |
| Report Date | V0.62 13.10.18.12.58 |

## Path Length - Path

| Date            | Method       | FileName             | ethylene (ppm) | SEC (ppm) |
|-----------------|--------------|----------------------|----------------|-----------|
| 10/10/2013 8:12 | 0913-111_CTS | 13_10_10_0812_04_850 | 8.79           | 0.137     |
| 10/10/2013 8:12 | 0913-111_CTS | 13_10_10_0812_23_390 | 8.77           | 0.136     |
| 10/10/2013 8:12 | 0913-111_CTS | 13_10_10_0812_42_040 | 8.78           | 0.137     |
| 10/10/2013 8:13 | 0913-111_CTS | 13_10_10_0813_00_420 | 8.80           | 0.136     |
| 10/10/2013 8:13 | 0913-111_CTS | 13_10_10_0813_18_930 | 8.82           | 0.137     |
| 10/10/2013 8:13 | 0913-111_CTS | 13_10_10_0813_37_540 | 8.81           | 0.138     |
| 10/10/2013 8:13 | 0913-111_CTS | 13_10_10_0813_56_040 | 8.82           | 0.137     |
| 10/10/2013 8:14 | 0913-111_CTS | 13_10_10_0814_14_670 | 8.80           | 0.138     |

**Average (m) 8.80 0.137**

|                  |              |                      |      |       |
|------------------|--------------|----------------------|------|-------|
| 10/10/2013 19:33 | 0913-111_CTS | 13_10_10_1933_09_783 | 8.67 | 0.137 |
| 10/10/2013 19:33 | 0913-111_CTS | 13_10_10_1933_28_313 | 8.69 | 0.137 |
| 10/10/2013 19:33 | 0913-111_CTS | 13_10_10_1933_46_843 | 8.69 | 0.138 |
| 10/10/2013 19:34 | 0913-111_CTS | 13_10_10_1934_05_353 | 8.71 | 0.137 |
| 10/10/2013 19:34 | 0913-111_CTS | 13_10_10_1934_23_963 | 8.70 | 0.137 |
| 10/10/2013 19:34 | 0913-111_CTS | 13_10_10_1934_42_473 | 8.71 | 0.138 |
| 10/10/2013 19:35 | 0913-111_CTS | 13_10_10_1935_01_103 | 8.66 | 0.137 |
| 10/10/2013 19:35 | 0913-111_CTS | 13_10_10_1935_19_513 | 8.67 | 0.139 |

**Average (m) 8.69 0.138**

**Average Pathlength (m) 8.74 0.137**

Max (m) 8.80

Min (m) 8.69

Max % Deviation 0.62%

|                  |                |
|------------------|----------------|
| Company          | ACT            |
| Analyst Initials | CJT            |
| Parameters       | EPA Method 320 |
| # Samples        | 21 Runs        |

|             |                      |
|-------------|----------------------|
| Client #    | 1911                 |
| Job #       | 0913-111             |
| PO #        | 3134 1911            |
| Report Date | V0.62 13.10.18.12.58 |

## Path Length - Path

| Date                          | Method       | FileName             | ethylene (ppm) | SEC (ppm)    |
|-------------------------------|--------------|----------------------|----------------|--------------|
| 10/11/2013 9:38               | 0913-111_CTS | 13_10_11_0938_33_970 | 8.13           | 0.130        |
| 10/11/2013 9:38               | 0913-111_CTS | 13_10_11_0938_52_580 | 8.16           | 0.129        |
| 10/11/2013 9:39               | 0913-111_CTS | 13_10_11_0939_11_060 | 8.17           | 0.129        |
| 10/11/2013 9:39               | 0913-111_CTS | 13_10_11_0939_29_540 | 8.18           | 0.129        |
| 10/11/2013 9:39               | 0913-111_CTS | 13_10_11_0939_48_180 | 8.19           | 0.130        |
| 10/11/2013 9:40               | 0913-111_CTS | 13_10_11_0940_06_710 | 8.18           | 0.129        |
| 10/11/2013 9:40               | 0913-111_CTS | 13_10_11_0940_25_190 | 8.20           | 0.129        |
| 10/11/2013 9:40               | 0913-111_CTS | 13_10_11_0940_43_760 | 8.18           | 0.130        |
| <b>Average (m)</b>            |              |                      | <b>8.17</b>    | <b>0.129</b> |
| 10/11/2013 11:22              | 0913-111_CTS | 13_10_11_1122_55_958 | 8.63           | 0.133        |
| 10/11/2013 11:23              | 0913-111_CTS | 13_10_11_1123_14_479 | 8.66           | 0.133        |
| 10/11/2013 11:23              | 0913-111_CTS | 13_10_11_1123_32_989 | 8.68           | 0.133        |
| 10/11/2013 11:23              | 0913-111_CTS | 13_10_11_1123_51_519 | 8.71           | 0.133        |
| 10/11/2013 11:24              | 0913-111_CTS | 13_10_11_1124_10_019 | 8.70           | 0.134        |
| 10/11/2013 11:24              | 0913-111_CTS | 13_10_11_1124_28_559 | 8.73           | 0.134        |
| 10/11/2013 11:24              | 0913-111_CTS | 13_10_11_1124_47_159 | 8.74           | 0.134        |
| 10/11/2013 11:25              | 0913-111_CTS | 13_10_11_1125_05_659 | 8.74           | 0.134        |
| <b>Average (m)</b>            |              |                      | <b>8.70</b>    | <b>0.134</b> |
| <b>Average Pathlength (m)</b> |              |                      | <b>8.44</b>    | <b>0.131</b> |
| Max (m)                       |              |                      | 8.70           |              |
| Min (m)                       |              |                      | 8.17           |              |
| Max % Deviation               |              |                      | 3.10%          |              |

|                  |                |
|------------------|----------------|
| Company          | ACT            |
| Analyst Initials | CJT            |
| Parameters       | EPA Method 320 |
| # Samples        | 21 Runs        |

|             |                      |
|-------------|----------------------|
| Client #    | 1911                 |
| Job #       | 0913-111             |
| PO #        | 3134 1911            |
| Report Date | V0.62 13.10.18.12.58 |

## Path Length - Path

| Date               | Method       | FileName             | ethylene (ppm) | SEC (ppm)    |
|--------------------|--------------|----------------------|----------------|--------------|
| 10/11/2013 11:22   | 0913-111_CTS | 13_10_11_1122_55_958 | 8.63           | 0.133        |
| 10/11/2013 11:23   | 0913-111_CTS | 13_10_11_1123_14_479 | 8.66           | 0.133        |
| 10/11/2013 11:23   | 0913-111_CTS | 13_10_11_1123_32_989 | 8.68           | 0.133        |
| 10/11/2013 11:23   | 0913-111_CTS | 13_10_11_1123_51_519 | 8.71           | 0.133        |
| 10/11/2013 11:24   | 0913-111_CTS | 13_10_11_1124_10_019 | 8.70           | 0.134        |
| 10/11/2013 11:24   | 0913-111_CTS | 13_10_11_1124_28_559 | 8.73           | 0.134        |
| 10/11/2013 11:24   | 0913-111_CTS | 13_10_11_1124_47_159 | 8.74           | 0.134        |
| 10/11/2013 11:25   | 0913-111_CTS | 13_10_11_1125_05_659 | 8.74           | 0.134        |
| <b>Average (m)</b> |              |                      | <b>8.70</b>    | <b>0.134</b> |
| 10/11/2013 13:02   | 0913-111_CTS | 13_10_11_1302_32_762 | 8.73           | 0.133        |
| 10/11/2013 13:02   | 0913-111_CTS | 13_10_11_1302_51_282 | 8.77           | 0.134        |
| 10/11/2013 13:03   | 0913-111_CTS | 13_10_11_1303_09_882 | 8.73           | 0.133        |
| 10/11/2013 13:03   | 0913-111_CTS | 13_10_11_1303_28_382 | 8.71           | 0.133        |
| 10/11/2013 13:03   | 0913-111_CTS | 13_10_11_1303_46_792 | 8.74           | 0.133        |
| 10/11/2013 13:04   | 0913-111_CTS | 13_10_11_1304_05_402 | 8.75           | 0.133        |
| 10/11/2013 13:04   | 0913-111_CTS | 13_10_11_1304_23_922 | 8.74           | 0.133        |
| 10/11/2013 13:04   | 0913-111_CTS | 13_10_11_1304_42_382 | 8.73           | 0.133        |
| <b>Average (m)</b> |              |                      | <b>8.74</b>    | <b>0.133</b> |
| 10/11/2013 17:56   | 0913-111_CTS | 13_10_11_1756_33_272 | 8.44           | 0.129        |
| 10/11/2013 17:56   | 0913-111_CTS | 13_10_11_1756_51_882 | 8.57           | 0.130        |
| 10/11/2013 17:57   | 0913-111_CTS | 13_10_11_1757_10_412 | 8.67           | 0.132        |
| 10/11/2013 17:57   | 0913-111_CTS | 13_10_11_1757_29_032 | 8.71           | 0.132        |
| 10/11/2013 17:57   | 0913-111_CTS | 13_10_11_1757_47_542 | 8.75           | 0.132        |
| 10/11/2013 17:58   | 0913-111_CTS | 13_10_11_1758_06_042 | 8.76           | 0.132        |
| 10/11/2013 17:58   | 0913-111_CTS | 13_10_11_1758_24_642 | 8.79           | 0.133        |
| 10/11/2013 17:58   | 0913-111_CTS | 13_10_11_1758_43_102 | 8.75           | 0.133        |
| <b>Average (m)</b> |              |                      | <b>8.68</b>    | <b>0.132</b> |
| 10/12/2013 7:59    | 0913-111_CTS | 13_10_12_0759_05_353 | 8.70           | 0.139        |
| 10/12/2013 7:59    | 0913-111_CTS | 13_10_12_0759_23_963 | 8.74           | 0.139        |
| 10/12/2013 7:59    | 0913-111_CTS | 13_10_12_0759_42_473 | 8.71           | 0.137        |
| 10/12/2013 8:00    | 0913-111_CTS | 13_10_12_0800_01_103 | 8.70           | 0.136        |
| 10/12/2013 8:00    | 0913-111_CTS | 13_10_12_0800_19_593 | 8.69           | 0.137        |
| 10/12/2013 8:00    | 0913-111_CTS | 13_10_12_0800_38_103 | 8.75           | 0.136        |
| 10/12/2013 8:00    | 0913-111_CTS | 13_10_12_0800_56_713 | 8.68           | 0.136        |
| 10/12/2013 8:01    | 0913-111_CTS | 13_10_12_0801_15_143 | 8.68           | 0.136        |

|                  |                |
|------------------|----------------|
| Company          | ACT            |
| Analyst Initials | CJT            |
| Parameters       | EPA Method 320 |
| # Samples        | 21 Runs        |

|             |                      |
|-------------|----------------------|
| Client #    | 1911                 |
| Job #       | 0913-111             |
| PO #        | 3134 1911            |
| Report Date | V0.62 13.10.18.12.58 |

## Path Length - Path

| Date             | Method       | FileName<br>Average (m) | ethylene (ppm)<br>8.71 | SEC (ppm)<br>0.137 |
|------------------|--------------|-------------------------|------------------------|--------------------|
| 10/12/2013 8:15  | 0913-111_CTS | 13_10_12_0815_33_684    | 8.60                   | 0.134              |
| 10/12/2013 8:15  | 0913-111_CTS | 13_10_12_0815_52_184    | 8.59                   | 0.134              |
| 10/12/2013 8:16  | 0913-111_CTS | 13_10_12_0816_10_704    | 8.58                   | 0.134              |
| 10/12/2013 8:16  | 0913-111_CTS | 13_10_12_0816_29_314    | 8.60                   | 0.133              |
| 10/12/2013 8:16  | 0913-111_CTS | 13_10_12_0816_47_804    | 8.60                   | 0.133              |
| 10/12/2013 8:17  | 0913-111_CTS | 13_10_12_0817_06_244    | 8.61                   | 0.134              |
| 10/12/2013 8:17  | 0913-111_CTS | 13_10_12_0817_24_834    | 8.62                   | 0.133              |
| 10/12/2013 8:17  | 0913-111_CTS | 13_10_12_0817_43_344    | 8.59                   | 0.134              |
| Average (m)      |              |                         | 8.60                   | 0.134              |
| 10/12/2013 13:02 | 0913-111_CTS | 13_10_12_1302_33_472    | 8.74                   | 0.137              |
| 10/12/2013 13:02 | 0913-111_CTS | 13_10_12_1302_52_082    | 8.76                   | 0.137              |
| 10/12/2013 13:03 | 0913-111_CTS | 13_10_12_1303_10_582    | 8.79                   | 0.137              |
| 10/12/2013 13:03 | 0913-111_CTS | 13_10_12_1303_29_082    | 8.79                   | 0.138              |
| 10/12/2013 13:03 | 0913-111_CTS | 13_10_12_1303_47_602    | 8.78                   | 0.137              |
| 10/12/2013 13:04 | 0913-111_CTS | 13_10_12_1304_06_112    | 8.77                   | 0.137              |
| 10/12/2013 13:04 | 0913-111_CTS | 13_10_12_1304_24_752    | 8.78                   | 0.137              |
| 10/12/2013 13:04 | 0913-111_CTS | 13_10_12_1304_43_242    | 8.78                   | 0.138              |
| Average (m)      |              |                         | 8.78                   | 0.137              |
| 10/12/2013 19:42 | 0913-111_CTS | 13_10_12_1942_21_772    | 8.68                   | 0.133              |
| 10/12/2013 19:42 | 0913-111_CTS | 13_10_12_1942_40_362    | 8.71                   | 0.132              |
| 10/12/2013 19:42 | 0913-111_CTS | 13_10_12_1942_58_862    | 8.77                   | 0.134              |
| 10/12/2013 19:43 | 0913-111_CTS | 13_10_12_1943_17_462    | 8.77                   | 0.134              |
| 10/12/2013 19:43 | 0913-111_CTS | 13_10_12_1943_35_992    | 8.80                   | 0.134              |
| 10/12/2013 19:43 | 0913-111_CTS | 13_10_12_1943_54_432    | 8.79                   | 0.133              |
| 10/12/2013 19:44 | 0913-111_CTS | 13_10_12_1944_13_082    | 8.82                   | 0.135              |
| 10/12/2013 19:44 | 0913-111_CTS | 13_10_12_1944_31_502    | 8.78                   | 0.134              |
| Average (m)      |              |                         | 8.76                   | 0.134              |
| 10/13/2013 7:58  | 0913-111_CTS | 13_10_13_0758_40_845    | 8.55                   | 0.130              |
| 10/13/2013 7:58  | 0913-111_CTS | 13_10_13_0758_59_345    | 8.50                   | 0.129              |
| 10/13/2013 7:59  | 0913-111_CTS | 13_10_13_0759_17_835    | 8.49                   | 0.129              |
| 10/13/2013 7:59  | 0913-111_CTS | 13_10_13_0759_36_445    | 8.50                   | 0.129              |
| 10/13/2013 7:59  | 0913-111_CTS | 13_10_13_0759_54_925    | 8.49                   | 0.129              |
| 10/13/2013 8:00  | 0913-111_CTS | 13_10_13_0800_13_565    | 8.51                   | 0.130              |
| 10/13/2013 8:00  | 0913-111_CTS | 13_10_13_0800_31_995    | 8.47                   | 0.130              |

|                  |                |
|------------------|----------------|
| Company          | ACT            |
| Analyst Initials | CJT            |
| Parameters       | EPA Method 320 |
| # Samples        | 21 Runs        |

|             |                      |
|-------------|----------------------|
| Client #    | 1911                 |
| Job #       | 0913-111             |
| PO #        | 3134 1911            |
| Report Date | V0.62 13.10.18.12.58 |

## Path Length - Path

| Date                          | Method       | FileName             | ethylene (ppm) | SEC (ppm)    |
|-------------------------------|--------------|----------------------|----------------|--------------|
| 10/13/2013 8:00               | 0913-111_CTS | 13_10_13_0800_50_506 | 8.52           | 0.130        |
| <b>Average (m)</b>            |              |                      | <b>8.50</b>    | <b>0.130</b> |
| 10/13/2013 8:16               | 0913-111_CTS | 13_10_13_0816_09_687 | 8.73           | 0.133        |
| 10/13/2013 8:16               | 0913-111_CTS | 13_10_13_0816_28_197 | 8.69           | 0.133        |
| 10/13/2013 8:16               | 0913-111_CTS | 13_10_13_0816_46_707 | 8.71           | 0.134        |
| 10/13/2013 8:17               | 0913-111_CTS | 13_10_13_0817_05_247 | 8.72           | 0.133        |
| 10/13/2013 8:17               | 0913-111_CTS | 13_10_13_0817_23_757 | 8.73           | 0.134        |
| 10/13/2013 8:17               | 0913-111_CTS | 13_10_13_0817_42_347 | 8.77           | 0.134        |
| 10/13/2013 8:18               | 0913-111_CTS | 13_10_13_0818_00_857 | 8.70           | 0.133        |
| 10/13/2013 8:18               | 0913-111_CTS | 13_10_13_0818_19_377 | 8.74           | 0.134        |
| <b>Average (m)</b>            |              |                      | <b>8.72</b>    | <b>0.134</b> |
| 10/13/2013 14:34              | 0913-111_CTS | 13_10_13_1434_10_233 | 8.70           | 0.135        |
| 10/13/2013 14:34              | 0913-111_CTS | 13_10_13_1434_28_743 | 8.73           | 0.135        |
| 10/13/2013 14:34              | 0913-111_CTS | 13_10_13_1434_47_263 | 8.76           | 0.136        |
| 10/13/2013 14:35              | 0913-111_CTS | 13_10_13_1435_05_884 | 8.75           | 0.135        |
| 10/13/2013 14:35              | 0913-111_CTS | 13_10_13_1435_24_394 | 8.72           | 0.133        |
| 10/13/2013 14:35              | 0913-111_CTS | 13_10_13_1435_42_804 | 8.74           | 0.135        |
| 10/13/2013 14:36              | 0913-111_CTS | 13_10_13_1436_01_424 | 8.74           | 0.134        |
| 10/13/2013 14:36              | 0913-111_CTS | 13_10_13_1436_19_934 | 8.72           | 0.134        |
| <b>Average (m)</b>            |              |                      | <b>8.73</b>    | <b>0.135</b> |
| <b>Average Pathlength (m)</b> |              |                      | <b>8.69</b>    | <b>0.134</b> |
| Max (m)                       |              |                      | 8.78           |              |
| Min (m)                       |              |                      | 8.50           |              |
| Max % Deviation               |              |                      | 2.17%          |              |



## **APPENDIX D**

### **Method 320 Log Sheet**

## FTIR Log - Enviva Wiggins

| Date   | Time | Filename              | Method    | Pressure | Notes                                                  | Run ID |                                 |
|--------|------|-----------------------|-----------|----------|--------------------------------------------------------|--------|---------------------------------|
| 10-Oct | 754  | 13.10.10.0753.42.969  | CTS       | 14.7     | Background                                             |        |                                 |
|        | 806  | 13.10.10.0806.08.036  | CTS       | 14.7     | CTS (pathlength = 8.78 m)                              |        |                                 |
|        | 855  | 13.10.10.0855.00.744  | 0913-177A | 14.6     | Background                                             |        |                                 |
|        | 914  | 13.10.10.0914.12.674  | 0913-177A | 13.5     | Sampling GHM - Run 1 (0917-1017)                       | 1      |                                 |
|        | 1036 | 13.10.10.0914.12.674  | 0913-177A | 13.3     | Sampling GHM - Run 2 (1036-1136)                       | 2      |                                 |
|        | 1150 | 13.10.10.0914.12.674  | 0913-177A | 13.5     | Sampling GHM - Run 3 (1150-1250)                       | 3      |                                 |
|        | 1738 | 13.10.10.1429.45.242  | 0913-177A | 13.9     | Sampling Dryer 1 - Run 1 (1738-1838)                   | 4      |                                 |
|        | 1915 | 13.10.10.1915.03.541  | 0913-177A | 14.6     | Background                                             |        |                                 |
|        | 1923 | 13.10.10.1923.11.342  | CTS       | 14.6     | Background                                             |        |                                 |
|        | 1926 | 13.10.10.1926.54.274  | CTS       | 14.7     | CTS (pathlength = 8.78 m)                              |        |                                 |
|        | 2005 | 13.10.10.2004.59.706  | 0913-177A | 14.6     | Water Spectra (Dryer 1 - Run 1)                        |        |                                 |
|        | 2035 | 13.10.10.2034.59.394  | 0913-177A | 14.6     | Water Spectra (GHM)                                    |        |                                 |
| 11-Oct | 933  | 13.10.11.0932.48.189  | CTS       | 14.8     | Background                                             |        | Background interference         |
|        | 936  | 13.10.11.0936.57.524  | CTS       | 14.8     | CTS (pathlength = 8.18 m)                              |        |                                 |
|        | 948  | 13.10.11.0948.41.630  | 0913-177A | 14.8     | Background                                             |        |                                 |
|        | 955  | 13.10.11.0954.19.486  | 0913-177A | 14.4     | Sampling Dryer 1 - Run 2 (1000-1100)                   | 5      |                                 |
|        | 1117 | 13.10.11.1117.32.588  | CTS       | 14.8     | Background                                             |        |                                 |
|        | 1121 | 13.10.11.1121.00.310  | CTS       | 14.8     | CTS (pathlength = 8.73 m)                              |        |                                 |
|        | 1127 | 13.10.11.1127.34.199  | 0913-177A | 14.7     | Background                                             |        |                                 |
|        | 1137 | 13.10.11.1134.41.951  | 0913-177A | 14.2     | Sampling Dryer 1 - Run 3 (1137-1237)                   | 6      |                                 |
|        | 1257 | 13.10.11.1257.46.512  | CTS       | 14.7     | Background                                             |        |                                 |
|        | 1301 | 13.10.11.1301.14.338  | CTS       | 14.7     | CTS (pathlength = 8.73 m)                              |        |                                 |
|        | 1308 | 13.10.11.1308.39.947  | 0913-177A | 14.7     | Background                                             |        |                                 |
|        | 1342 | 13.10.11.1342.51.774  | 0913-177A | 14.2     | Sampling Pellet Cooler 2 - Run 1 (1343-1443)           | 7      |                                 |
|        | 1508 | 13.10.11.1342.51.774  | 0913-177A | 14.1     | Sampling Pellet Cooler 2 - Run 2 (1508-1608)           | 8      |                                 |
|        | 1650 | 13.10.11.1342.51.774  | 0913-177A | 14.1     | Sampling Pellet Cooler 2 - Run 3 (1629-1729)           | 9      |                                 |
|        | 1752 | 13.10.11.1752.08.661  | CTS       | 14.6     | Background                                             |        |                                 |
|        | 1755 | 13.10.11.1755.37.781  | CTS       | 14.6     | CTS (pathlength = 8.7165 m)                            |        |                                 |
|        | 1802 | 13.10.11.1802.37.522  | 0913-177A | 14.6     | Background                                             |        |                                 |
|        | 1342 | 13.10.11.1809.44.552  | 0913-177A | 14.3     | Sampling Hammermill 2 - Run 1 (1811-1911)              | 10     |                                 |
|        | 1935 | 13.10.11.1809.44.552  | 0913-177A | 14.4     | Sampling Hammermill 2 - Run 2 (1935-2035)              | 11     |                                 |
|        | 2048 | 13.10.11.1809.44.552  | 0913-177A | 14.5     | Sampling Hammermill 2 - Run 3 (2048-2148)              | 12     |                                 |
|        | 2200 | 13.10.11.2200.54.734  | CTS       | 14.7     | Background                                             |        |                                 |
|        | 2204 | 13.10.11.2204.32.940  | CTS       | 14.8     | CTS (pathlength = 8.75475 m)                           |        |                                 |
|        | 2213 | 13.10.11.2213.44.875  | 0913-177A | 14.8     | Background                                             |        |                                 |
|        | 2224 | 13.10.11.2224.53.772  | 0913-177A | 14.7     | Water Spectra (Dryer 1 - Run 2, 3)                     |        |                                 |
|        | 2240 | 13.10.11.2240.27.896  | 0913-177A | 14.7     | Water Spectra (Pellet Cooler 2, Hammermill 2)          |        |                                 |
| 12-Oct | 0805 | 13.10.12.0805.29.253  | CTS       | 14.9     | Background                                             |        |                                 |
|        | 0809 | 13.10.12.0809.22.964  | CTS       | 14.9     | CTS (pathlength = 8.59 m)                              |        |                                 |
|        | 0822 | 13.10.12.08.22.17.097 | 0913-177A | 14.8     | Background                                             |        |                                 |
|        | 858  | 13.10.12.0857.28.740  | 0913-177A | 14.4     | Sampling Pellet Cooler 1- Run 1 (0858-0958)            | 13     |                                 |
|        | 1022 | 13.10.12.0857.28.740  | 0913-177A | 14.3     | Sampling Pellet Cooler 1- Run 2 (1022-1122)            | 14     |                                 |
|        | 1141 | 13.10.12.0857.28.740  | 0913-177A | 14.2     | Sampling Pellet Cooler 1- Run 1 (1141-1241)            | 15     |                                 |
|        | 1257 | 13.10.12.1257.12.281  | CTS       | 14.6     | Background                                             |        |                                 |
|        | 1301 | 13.10.12.1300.55.794  | CTS       | 14.6     | CTS (pathlength = 8.77 m)                              |        |                                 |
|        | 1308 | 13.10.12.1309.21.752  | 0913-177A | 14.6     | Background                                             |        |                                 |
|        | 1509 | 13.10.12.1347.50.707  | 0913-177A | 13.8     | Sampling Aspirator- Run 1 (1509-1609)                  | 16     |                                 |
|        | 1636 | 13.10.12.1347.50.707  | 0913-177A | 13.8     | Sampling Aspirator- Run 2 (1636-1736)                  | 17     |                                 |
|        | 1800 | 13.10.12.1347.50.707  | 0913-177A | 13.9     | Sampling Aspirator- Run 3 (1800-1900)                  | 18     |                                 |
|        | 1936 | 13.10.12.1936.27.563  | CTS       | 14.91    | Background                                             |        |                                 |
|        | 1940 | 13.10.12.1940.26.868  | CTS       | 14.72    | CTS (pathlength = 8.78 m)                              |        |                                 |
|        | 1951 | 13.10.12.1951.39.443  | 0913-177A | 14.75    | Background                                             |        |                                 |
|        | 2003 | 13.10.12.2003.07.633  | 0913-177A | 14.59    | Water Spectra (Aspirator)                              |        |                                 |
|        | 2023 | 13.10.12.2023.12.427  | 0913-177A | 14.55    | Water Spectra (Pellet Cooler 1)                        |        |                                 |
| 13-Oct | 807  | 13.10.13.0807.16.306  | 0913-177A | 14.77    | Background                                             |        |                                 |
|        | 0810 | 13.10.13.0810.33.996  | CTS       | 14.78    | Background                                             |        |                                 |
|        | 0810 | 13.10.13.0813.37.211  | CTS       | 14.85    | CTS (pathlength = 8.71 m)                              |        |                                 |
|        | 0921 | 13.10.13.0919.17.032  | 0913-177A | 14.24    | Sampling Dryer 2 - Run 1 (0921-1021)                   | 19     |                                 |
|        | 1104 | 13.10.13.0919.17.032  | 0913-177A | 14.17    | Sampling Dryer 2 - Run 2 (1104-1204)                   | 20     |                                 |
|        | 1231 | 13.10.13.0919.17.032  | 0913-177A | 14.17    | Sampling Dryer 2 - Run 3 (1231-1347); paused 1236-1252 | 21     |                                 |
|        | 1420 | 13.10.13.1419.54.342  | CTS       | 14.91    | Background                                             |        |                                 |
|        | 1430 | 13.10.13.1425.31.173  | CTS       | 14.85    | CTS (pathlength = 8.73 m)                              |        |                                 |
|        | 1447 | 13.10.13.1447.35.695  | 0913-177A | 14.8     | Background                                             |        |                                 |
|        | 1506 | 13.10.13.1506.31.082  | 0913-177A | 14.71    | Water Spectra (Dryer 2)                                |        | 1130-1200 water condensation in |

## **APPENDIX E**

### **Example Calculations**

## EXAMPLE CALCULATIONS

Run Number: Dryer 1 – Run 1

### **Stack Gas Temperature, °R**

$$T_s = 460 + t_s$$

$$T_s = 460 + 146.3 = 606.3 \text{ } ^\circ\text{R}$$

### **Volume of Dry Gas Sampled at Standard Conditions, Dry Standard Cubic Feet**

$$V_{\text{mstd}} = [17.64] \left[ \frac{\left( P_{\text{bar}} + \frac{\Delta H}{13.6} \right)}{T_m + 460} \right]$$

$$V_{\text{mstd}} = [17.64] [0.9728] [33.201] \left[ \frac{\left( 29.90 + \frac{1.00}{13.6} \right)}{541.3} \right]$$

$$V_{\text{mstd}} = 31.564 \text{ ft}^3$$

### **Volume of Water Sampled, SCF**

$$V_{\text{wstd}} = 0.04715 [\text{Weight of Condensed Moisture}]$$

$$V_{\text{wstd}} = 0.04715 [129.5]$$

$$V_{\text{wstd}} = 6.106 \text{ ft}^3$$

### **Fraction of Water Vapor in Sample Gas Stream**

$$\% \text{H}_2\text{O} = \left[ \frac{V_{\text{wstd}}}{V_{\text{mstd}} + V_{\text{wstd}}} \right] \times 100$$

$$\% \text{H}_2\text{O} = \left[ \frac{6.106}{31.564 + 6.106} \right] \times 100$$

$$\% \text{H}_2\text{O} = 16.21$$

### **Dry Mole Fraction of Flue Gas**

$$M_{fd} = 1 - \%H_2O/100$$

$$M_{fd} = 1 - [16.21/100]$$

$$M_{fd} = 0.838$$

### **Molecular Weight of Sample Gas, Dry**

$$M_d = 0.44[\%CO_2] + 0.32[\%O_2] + 0.28[100 - \%O_2 - \%CO_2]$$

$$M_d = 0.44[2.0] + 0.32[19.0] + 0.28[100 - 19.0 - 2.0]$$

$$M_d = 29.08 \text{ pounds/pound-mole}$$

### **Molecular Weight of Sample Gas, Actual Conditions**

$$M_s = [M_d \times M_{fd}] + [0.18 \times \%H_2O]$$

$$M_s = [29.08 \times 0.838] + [0.18 \times 16.21]$$

$$M_s = 27.28 \text{ pounds/pound-mole}$$

### **Average Stack Gas Velocity, Feet/second**

$$v_s = K_p C_p \left( \sqrt{(\Delta p)} \right)_{avg} \left[ \sqrt{\frac{T_s + 460}{P_s M_s}} \right]$$

$$v_s = (85.49)(0.84) \left( \sqrt{(0.1.283)} \right) \left[ \sqrt{\frac{606.3}{(29.84)(27.28)}} \right]$$

$$v_s = 70.18 \text{ feet/second}$$

### **Wet Volumetric Flue Gas Flow Rate at Stack Conditions, Cubic Feet per Minute**

$$Q_{aw} = 60 \times v_s \times A$$

$$Q_{aw} = 60 \times 70.18 \times 10.56$$

$$Q_{aw} = 44,461 \text{ Actual Cubic Feet per Minute}$$

### **Dry Volumetric Flue Gas Flow Rate at Standard Conditions, Cubic Feet per Minute**

$$Q_{sd} = 60 \times Mfd \times v_s \times A \times \left[ \frac{528}{ts + 460} \right] \left[ \frac{Ps}{29.92} \right]$$

$$Q_{sd} = 60 \times 0.838 \times 70.18 \times 10.56 \left[ \frac{528}{606.3} \right] \left[ \frac{29.84}{29.92} \right]$$

$$Q_{sd} = 32,360 \text{ Dry Standard Cubic Feet per Minute}$$

### **Average THC Dry Basis Concentration as Propane**

$$C_{THCD} = (C_{THCW}) / (M_{fd})$$

Where:  $C_{THCd}$  = dry basis concentration of THC in ppm  
 $M_{fd}$  = dry mole fraction from Method 4 concurrent run

$$C_{THCD} = 66.7 / 0.838 = 79.6 \text{ ppm THC as propane}$$

### **Average THC Dry Basis Concentration as Carbon**

$$C_{THCD} = (C_{THCW}) \times (3) / (M_{fd})$$

Where:  $C_{THCd}$  = dry basis concentration of THC in ppm  
 $M_{fd}$  = dry mole fraction from Method 4 concurrent run

$$C_{THCD} = (66.7) \times (3) / 0.838 = 238.8 \text{ ppm THC as Carbon}$$

### **VOC Emission Rate in Pounds Per Hour**

$$E_{VOC} = (C_{VOC}) (Q_{SD}) (60 \text{ min/hr}) (C_F)$$

Where:  $Q_{SD}$  = measured flow rate in stack in dscfm  
 $C_F$  = Conversion factor in lb/scf – ppm  
 $C_F = 3.117 \times 10^{-8}$  for Carbon

$$E_{VOC} = (238.8) (32,360) (60 \text{ min/hr}) (3.117 \times 10^{-8}) = 14.5 \text{ lb/hr as Carbon}$$

## **APPENDIX F**

### **Gas Cylinder Certification Sheets**

## CERTIFICATE OF ANALYSIS

### Grade of Product: EPA Protocol

**Airgas Specialty Gases**

630 United Drive  
Durham, NC 27713  
919-544-3773 Fax: 919-544-3774  
www.airgas.com

Part Number: E02A199E15A00A6  
Cylinder Number: CC410934  
Laboratory: ASG - Durham - NC  
PGVP Number: B22012  
Gas Code: APPVD

Reference Number: 122-124323950-1  
Cylinder Volume: 146 Cu.Ft.  
Cylinder Pressure: 2015 PSIG  
Valve Outlet: 590  
Analysis Date: Jul 02, 2012

**Expiration Date: Jul 02, 2015**

Certification performed in accordance with "EPA Traceability Protocol (Sept. 1997)" using the assay procedures listed. Analytical Methodology does not require correction for analytical interferences. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a volume/volume basis unless otherwise noted.  
Do Not Use This Cylinder below 150 psig i.e. 1 Mega Pascal

| ANALYTICAL RESULTS |                         |                      |                 |                            |
|--------------------|-------------------------|----------------------|-----------------|----------------------------|
| Component          | Requested Concentration | Actual Concentration | Protocol Method | Total Relative Uncertainty |
| PROPANE            | 28.00 PPM               | 27.99 PPM            | G1              | +/- 1% NIST Traceable      |
| Air                | Balance                 |                      |                 |                            |

| CALIBRATION STANDARDS |        |             |                      |                 |
|-----------------------|--------|-------------|----------------------|-----------------|
| Type                  | Lot ID | Cylinder No | Concentration        | Expiration Date |
| NTRM                  | 080610 | CC263046    | 49.62PPM PROPANE/AIR | May 14, 2018    |

| ANALYTICAL EQUIPMENT         |                      |                             |
|------------------------------|----------------------|-----------------------------|
| Instrument/Make/Model        | Analytical Principle | Last Multipoint Calibration |
| Nicolet 6700 AHR0801333 C3H8 | FTIR                 | Jun 19, 2012                |

Triad Data Available Upon Request

Notes: ANW PN: 781077

Approved for Release





Praxair Distribution Mid-Atlantic  
145 Shimmersville Rd.  
Bethlehem, PA 18015  
Tel: (610) 317-1608 Fax: (610) 758 8382  
PGVP ID:

DocNumber: 000003740

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

### Customer & Order Information:

CHEROKEE INSTRUMENTS INC \*  
901 BRIDGE ST  
FUQUAY VARINA NC 275260

Praxair Order Number: 13003732  
Customer P. O. Number: 10429  
Customer Reference Number:

Fill Date: 4/7/2010  
Part Number: EV AIPR50ME-AS  
Lot Number: 917009747  
Cylinder Style & Outlet: AS CGA 590  
Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

### Certified Concentration:

|                  |           |                         |
|------------------|-----------|-------------------------|
| Expiration Date: | 4/12/2018 | NIST Traceable          |
| Cylinder Number: | CC283143  | Analytical Uncertainty: |
| 50.0 ppm PROPANE | ± 1 %     |                         |
| Balance AIR      |           |                         |

Certification Information: Certification Date: 4/12/2010 Term: 96 Months Expiration Date: 4/12/2018

This cylinder was certified according to the 1997 EPA Traceability Protocol, Document #EPA-600/R-97/121, using Procedure G1. Do Not Use this Standard if Pressure is less than 150 PSIG.

### Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

#### 1. Component: PROPANE

Requested Concentration: 50 ppm  
Certified Concentration: 50.0 ppm  
Instrument Used: VARIAN 3300 INST 023 (PROPANE)  
Analytical Method: FID  
Last Multipoint Calibration: 3/16/2010

| First Analysis Data: |                  | Date:    |              | 4/12/2010 |
|----------------------|------------------|----------|--------------|-----------|
| Z: 0                 | R: 50.39         | C: 49.84 | Conc: 49.777 |           |
| R: 50.36             | Z: 0             | C: 50.21 | Conc: 50.147 |           |
| Z: 0                 | C: 50.2          | R: 50.34 | Conc: 50.137 |           |
| UOM: PPM             | Mean Test Assay: |          | 50.02 PPM    |           |

Reference Standard Type: GMIS  
Ref. Std. Cylinder #: CC162336  
Ref. Std. Conc: 50.3 PPM  
Ref. Std. Traceable to SRM #: 1668b  
SRM Sample #: 82-J-49  
SRM Cylinder #: XF003734B

| Second Analysis Data: |                  | Date: |         |  |
|-----------------------|------------------|-------|---------|--|
| Z: 0                  | R: 0             | C: 0  | Conc: 0 |  |
| R: 0                  | Z: 0             | C: 0  | Conc: 0 |  |
| Z: 0                  | C: 0             | R: 0  | Conc: 0 |  |
| UOM: PPM              | Mean Test Assay: |       | 0 PPM   |  |

Analyzed by:

*Megha Patel for*  
John Pribish

Certified by:

*Robin Morgan*  
Robin Morgan

## CERTIFICATE OF ANALYSIS

### Grade of Product: EPA Protocol

|                  |                   |                     |                 |
|------------------|-------------------|---------------------|-----------------|
| Part Number:     | E02AI99E15A3227   | Reference Number:   | 122-124370084-1 |
| Cylinder Number: | SG9164792BAL      | Cylinder Volume:    | 146.2 CF        |
| Laboratory:      | ASG - Durham - NC | Cylinder Pressure:  | 2015 PSIG       |
| PGVP Number:     | B22013            | Valve Outlet:       | 590             |
| Gas Code:        | PPN               | Certification Date: | Apr 17, 2013    |

**Expiration Date: Apr 17, 2021**

Certification performed in accordance with "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (May 2012)" document EPA 600/R-12/531, using the assay procedures listed. Analytical Methodology does not require correction for analytical interference. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a volume/volume basis unless otherwise noted.

Do Not Use This Cylinder below 100 psig, i.e. 0.7 megapascals.

| ANALYTICAL RESULTS |                         |                      |                 |                            |             |
|--------------------|-------------------------|----------------------|-----------------|----------------------------|-------------|
| Component          | Requested Concentration | Actual Concentration | Protocol Method | Total Relative Uncertainty | Assay Dates |
| PROPANE            | 86.00 PPM               | 86.13 PPM            | G1              | +/- 1% NIST Traceable      | 04/17/2013  |
| AIR                | Balance                 |                      |                 |                            |             |

| CALIBRATION STANDARDS |          |             |                       |             |                 |
|-----------------------|----------|-------------|-----------------------|-------------|-----------------|
| Type                  | Lot ID   | Cylinder No | Concentration         | Uncertainty | Expiration Date |
| NTRM                  | 09061735 | CC304058    | 97.82 PPM PROPANE/AIR | +/- 0.5%    | Oct 02, 2013    |

| ANALYTICAL EQUIPMENT         |                      |                             |
|------------------------------|----------------------|-----------------------------|
| Instrument/Make/Model        | Analytical Principle | Last Multipoint Calibration |
| Nicolet 6700 AHR0801333 C3H8 | FTIR                 | Mar 20, 2013                |

Triad Data Available Upon Request

Notes:

*[Signature]*

Approved for Release





Praxair Distribution Mid-Atlantic  
145 Shimersville Rd.  
Bethlehem, PA 18015  
Telephone: (610) 317-1608  
Facsimile: (610) 758-8382

DocNumber: 000007981

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

### Customer & Order Information:

CHEROKEE INSTRUMENTS INC \*  
901 BRIDGE ST  
FUQUAY VARINA NC 275260

Praxair Order Number: 15303079  
Customer P. O. Number: 11036  
Customer Reference Number:

FBI Date: 12/8/2010  
Part Number: AI PR260ZE-AS  
Lot Number: 917034266  
Cylinder Style & Outlet: AS CGA 590  
Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

### Certified Concentration:

|                   |            |                         |
|-------------------|------------|-------------------------|
| Expiration Date:  | 12/13/2013 | NIST Traceable          |
| Cylinder Number:  | CC109519   | Analytical Uncertainty: |
| 258.1 ppm PROPANE | ± 1 %      |                         |
| Balance AIR       |            |                         |

Certification Information: Certification Date: 12/13/2010 Term: 36 Months Expiration Date: 12/13/2013

This cylinder was certified according to the 1997 EPA Traceability Protocol, Document #EPA-600/R-97/121, using Procedure G1  
Do Not Use this Standard if Pressure is less than 150 PSIG

### Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

#### 1. Component: PROPANE

Requested Concentration: 260 ppm  
Certified Concentration: 258.1 ppm  
Instrument Used: VARIAN 3300 INST 023 (PROPANE)  
Analytical Method: FID  
Last Multipoint Calibration: 11/19/2010

Reference Standard Type: GMIS  
Ref. Std. Cylinder #: CC138736  
Ref. Std. Conc: 499.9 PPM  
Ref. Std. Traceable to SRM #: 1669b  
SRM Sample #: 81-H-14  
SRM Cylinder #: XF004157b

|                      |                             |          |              |
|----------------------|-----------------------------|----------|--------------|
| First Analysis Data: |                             | Date:    | 12/13/2010   |
| Z: 0                 | R: 501.2                    | C: 258.6 | Conc: 258.07 |
| R: 501.4             | Z: 0                        | C: 258.5 | Conc: 257.97 |
| Z: 0                 | C: 258.7                    | R: 500.2 | Conc: 258.17 |
| UOM: PPM             | Mean Test Assay: 258.07 PPM |          |              |

|                       |                        |       |         |
|-----------------------|------------------------|-------|---------|
| Second Analysis Data: |                        | Date: |         |
| Z: 0                  | R: 0                   | C: 0  | Conc: 0 |
| R: 0                  | Z: 0                   | C: 0  | Conc: 0 |
| Z: 0                  | C: 0                   | R: 0  | Conc: 0 |
| UOM: PPM              | Mean Test Assay: 0 PPM |       |         |

Analyzed by:

John Pribish 12/28/10

Certified by:

Ashley Davila



Praxair Distribution Mid-Atlantic  
145 Shimersville Rd.  
Bethlehem, PA 18015  
Telephone: (610) 317-1608  
Facsimile: (610) 758-8382

DocNumber: 000009995

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

### Customer & Order Information:

CHEROKEE INSTRUMENTS INC \*  
901 BRIDGE ST  
FUQUAY VARINA NC 275260

Praxair Order Number: 16230993  
Customer P. O. Number: 11207  
Customer Reference Number:

Fill Date: 3/17/2011  
Part Number: EV AIPR500ME-AS  
Lot Number: 917117666  
Cylinder Style & Outlet: AS CGA 590  
Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

### Certified Concentration:

|                  |           |                         |
|------------------|-----------|-------------------------|
| Expiration Date: | 3/21/2014 | NIST Traceable          |
| Cylinder Number: | SA20675   | Analytical Uncertainty: |
| 507.1 ppm        | PROPANE   | ± 1 %                   |
| Balance          | AIR       |                         |

Certification Information: Certification Date: 3/21/2011 Term: 36 Months Expiration Date: 3/21/2014

This cylinder was certified according to the 1997 EPA Traceability Protocol, Document #EPA-600/R-97/121, using Procedure G1

Do Not Use this Standard if Pressure is less than 150 PSIG

### Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

#### 1. Component: PROPANE

Requested Concentration: 500 ppm  
Certified Concentration: 507.1 ppm  
Instrument Used: VARIAN 3300 INST 023 (PROPANE)  
Analytical Method: FID  
Last Multipoint Calibration: 3/16/2011

|                      |                             |          |              |
|----------------------|-----------------------------|----------|--------------|
| First Analysis Data: |                             | Date:    | 3/21/2011    |
| Z: 0                 | R: 749.9                    | C: 508.2 | Conc: 507.86 |
| R: 749.1             | Z: 0                        | C: 507.2 | Conc: 506.86 |
| Z: 0                 | C: 506.8                    | R: 750.4 | Conc: 506.46 |
| UOM: PPM             | Mean Test Assay: 507.06 PPM |          |              |

Reference Standard Type: GMIS  
Ref. Std. Cylinder #: CC103865  
Ref. Std. Conc: 749.3 PPM  
Ref. Std. Traceable to SRM #: 2646a  
SRM Sample #: 103-C-23  
SRM Cylinder #: XF000820B

|                       |                        |       |         |
|-----------------------|------------------------|-------|---------|
| Second Analysis Data: |                        | Date: |         |
| Z: 0                  | R: 0                   | C: 0  | Conc: 0 |
| R: 0                  | Z: 0                   | C: 0  | Conc: 0 |
| Z: 0                  | C: 0                   | R: 0  | Conc: 0 |
| UOM: PPM              | Mean Test Assay: 0 PPM |       |         |

Analyzed by:

John Pribish

Certified by:

Michelle Kostik



## CERTIFICATE OF ANALYSIS

### Grade of Product: EPA Protocol

Airgas Specialty Gases  
630 United Drive  
Durham, NC 27713  
919-544-3773 Fax: 919-544-3774  
www.airgas.com

Part Number: E02AI99E15A0333  
Cylinder Number: CC148274  
Laboratory: ASG - Durham - NC  
PGVP Number: B22012  
Gas Code: APPVD

Reference Number: 122-124344171-1  
Cylinder Volume: 146 Cu.Ft.  
Cylinder Pressure: 2015 PSIG  
Valve Outlet: 590  
Analysis Date: Nov 05, 2012

Expiration Date: Nov 05, 2020

Certification performed in accordance with "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (May 2012)" document EPA 600/R-12/531, using the assay procedures listed. Analytical Methodology does not require correction for analytical interference. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a volume/volume basis unless otherwise noted.

Do Not Use This Cylinder below 100 psig, i.e. 0.7 megapascals.

| ANALYTICAL RESULTS |                         |                      |                 |                            |
|--------------------|-------------------------|----------------------|-----------------|----------------------------|
| Component          | Requested Concentration | Actual Concentration | Protocol Method | Total Relative Uncertainty |
| PROPANE            | 850.0 PPM               | 836.9 PPM            | G1              | +/- 1% NIST Traceable      |
| Air                | Balance                 |                      |                 |                            |

| CALIBRATION STANDARDS |        |             |                            |                 |
|-----------------------|--------|-------------|----------------------------|-----------------|
| Type                  | Lot ID | Cylinder No | Concentration              | Expiration Date |
| NTRM                  | 110609 | CC343416    | 1000.3PPM PROPANE/NITROGEN | Mar 04, 2017    |

| ANALYTICAL EQUIPMENT         |                      |                             |
|------------------------------|----------------------|-----------------------------|
| Instrument/Make/Model        | Analytical Principle | Last Multipoint Calibration |
| Nicolet 6700 AHR0801333 C3H8 | FTIR                 | Oct 11, 2012                |

Triad Data Available Upon Request

Notes:ANW PN: 781018

Approved for Release

6141 EASTON ROAD, BLDG 1, PLUMSTEADVILLE, PA 18949-0310

Phone: 800-331-4953 Fax: 215-766-7226

**CERTIFICATE OF ACCURACY: Certified Working Class Calibration Standard**

**Product Information**

Document #: 46628943-001  
Item No.: MM301080-T-30AL  
P.O. No.: 06081203

Cylinder Number: ALM018055  
Cylinder Size: 30AL  
Certification Date: 21Jun2012  
Expiration Date: 21Jun2014  
Lot Number: PLU0109851

**Customer**

ENTHALPY ANALYTICAL, INC.  
06081203  
800-1 CAPITOLA DRIVE  
DURHAM, NC 27703  
US

**CERTIFIED CONCENTRATION**

| <u>Component Name</u> | <u>Concentration<br/>(Moles)</u> | <u>Accuracy<br/>(+/-%)</u> |
|-----------------------|----------------------------------|----------------------------|
| METHANOL              | 105. PPM                         | 5                          |
| SULFUR HEXAFLUORIDE   | 3.0 PPM                          | 5                          |
| NITROGEN              | BALANCE                          |                            |

**TRACEABILITY**

**Traceable To**

Scott Reference Standard

APPROVED BY:

  
DAVID ASHNOFF

DATE:

6-21-2012

## CERTIFICATE OF ANALYSIS

**Grade of Product: CERTIFIED STANDARD-SPEC**

Part Number: X03NI99C15A1FX5  
Cylinder Number: CC90659  
Laboratory: ASG - Port Allen - LA  
Analysis Date: Sep 30, 2013  
Lot Number: 83-124390037-1A

Reference Number: 83-124390037-1A  
Cylinder Volume: 144.4 CF  
Cylinder Pressure: 2015 PSIG  
Valve Outlet: 350S

Product composition verified by direct comparison to calibration standards traceable to N.I.S.T. weights and/or N.I.S.T. Gas Mixture reference materials.

### ANALYTICAL RESULTS

| Component           | Requested Concentration | Actual Concentration (Mole %) | Analytical Uncertainty |
|---------------------|-------------------------|-------------------------------|------------------------|
| SULFUR HEXAFLUORIDE | 3.000 PPM               | 3.127 PPM                     | +/- 5%                 |
| METHANOL            | 100.0 PPM               | 91.71 PPM                     | +/- 2%                 |
| NITROGEN            | Balance                 |                               |                        |

Notes:

  
Approved for Release



## CERTIFICATE OF ANALYSIS

**Grade of Product: CERTIFIED STANDARD-SPEC**

Part Number: X02NI99C15A1268

Cylinder Number: CC432538

Laboratory: ASG - Durham - NC

Analysis Date: May 08, 2013

Lot Number: 122-124373993-1

Reference Number: 122-124373993-1

Cylinder Volume: 144.4 CF

Cylinder Pressure: 2015 PSIG

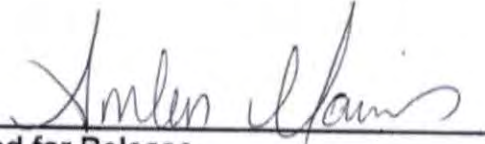
Valve Outlet: 350

Product composition verified by direct comparison to calibration standards traceable to N.I.S.T. weights and/or N.I.S.T. Gas Mixture reference materials.

### ANALYTICAL RESULTS

| Component | Requested Concentration | Actual Concentration (Mole %) | Analytical Uncertainty |
|-----------|-------------------------|-------------------------------|------------------------|
| ETHYLENE  | 100.0 PPM               | 99.88 PPM                     | +/- 2%                 |
| NITROGEN  | Balance                 |                               |                        |

Notes:

  
Approved for Release



## **APPENDIX F**

### **Equipment Calibration Sheets**

**APEX INSTRUMENTS METHOD 5 POST-TEST CONSOLE CALIBRATION**  
**USING CALIBRATED CRITICAL ORIFICES**  
**3-POINT ENGLISH UNITS**

| Meter Console Information |        |
|---------------------------|--------|
| Console Model Number      | 522    |
| Console Serial Number     | 909033 |
| DGM Model Number          | RW 110 |
| DGM Serial Number         | 961167 |

| Calibration Conditions                   |      |          |       |
|------------------------------------------|------|----------|-------|
| Date                                     | Time | 10/23/13 | 1030  |
| Barometric Pressure                      |      | 29.46    | in Hg |
| Theoretical Critical Vacuum <sup>1</sup> |      | 13.91    | in Hg |
| Calibration Technician                   |      | TTB      |       |

| Factors/Conversions |        |          |
|---------------------|--------|----------|
| Std Temp            | 528    | °R       |
| Std Press           | 29.92  | in Hg    |
| K <sub>1</sub>      | 17.647 | oR/in Hg |

<sup>1</sup>For valid test results, the Actual Vacuum should be 1 to 2 in. Hg greater than the Theoretical Critical Vacuum shown above.

<sup>2</sup>The Critical Orifice Coefficient, K', must be entered in English units, (ft<sup>3</sup>\*°R<sup>1/2</sup>)/(in.Hg\*min).

| Calibration Data |                     |                    |                    |                        |                      |                  |                        |                     |                     |                  |
|------------------|---------------------|--------------------|--------------------|------------------------|----------------------|------------------|------------------------|---------------------|---------------------|------------------|
| Run Time         |                     | Metering Console   |                    |                        |                      | Critical Orifice |                        |                     |                     |                  |
| Elapsed          | DGM Orifice<br>ΔH   | Volume<br>Initial  | Volume<br>Final    | Outlet Temp<br>Initial | Outlet Temp<br>Final | Serial<br>Number | Coefficient            | Amb Temp<br>Initial | Amb Temp<br>Final   | Actual<br>Vacuum |
| (θ)              | (P <sub>m</sub> )   | (V <sub>mi</sub> ) | (V <sub>mf</sub> ) | (t <sub>mi</sub> )     | (t <sub>mf</sub> )   | FO55             | K'                     | (t <sub>amb</sub> ) | (t <sub>amb</sub> ) |                  |
| min              | in H <sub>2</sub> O | cubic feet         | cubic feet         | °F                     | °F                   | FO55             | see above <sup>2</sup> | °F                  | °F                  | in Hg            |
| 16.0             | 1.20                | 637.000            | 646.659            | 62                     | 63                   | FO55             | 0.4594                 | 63                  | 65                  | 19.00            |
| 13.0             | 1.20                | 647.000            | 654.859            | 64                     | 64                   | FO55             | 0.4594                 | 65                  | 65                  | 19.00            |
| 13.0             | 1.20                | 655.100            | 662.965            | 64                     | 65                   | FO55             | 0.4594                 | 65                  | 66                  | 19.00            |

| Results                |                        |                         |                         |                    |           |                              |                     |             |
|------------------------|------------------------|-------------------------|-------------------------|--------------------|-----------|------------------------------|---------------------|-------------|
| Standardized Data      |                        |                         |                         | Dry Gas Meter      |           |                              |                     |             |
| Dry Gas Meter          |                        | Critical Orifice        |                         | Calibration Factor |           | Flowrate                     | ΔH @                |             |
| (V <sub>m(std)</sub> ) | (Q <sub>m(std)</sub> ) | (V <sub>cr(std)</sub> ) | (Q <sub>cr(std)</sub> ) | Value              | Variation | Std & Corr                   | 0.75 SCFM           | Variation   |
| (V <sub>m(std)</sub> ) | (Q <sub>m(std)</sub> ) | (V <sub>cr(std)</sub> ) | (Q <sub>cr(std)</sub> ) | (Y)                | (ΔY)      | (Q <sub>m(std)(corr)</sub> ) | (ΔH@)               | (ΔΔH@)      |
| cubic feet             | cfm                    | cubic feet              | cfm                     |                    |           | cfm                          | in H <sub>2</sub> O |             |
| 9.639                  | 0.602                  | 9.460                   | 0.591                   | 0.981              | 0.000     | 0.591                        | 1.934               | 0.001       |
| 7.821                  | 0.602                  | 7.679                   | 0.591                   | 0.982              | 0.000     | 0.591                        | 1.933               | -0.001      |
| 7.819                  | 0.601                  | 7.675                   | 0.590                   | 0.982              | 0.000     | 0.590                        | 1.933               | -0.001      |
| Pretest Gamma          | 0.9828                 | % Deviation             | 0.1                     | 0.982              | Y Average |                              | 1.933               | ΔH@ Average |

Note: For Calibration Factor Y, the ratio of the reading of the calibration meter to the dry gas meter, acceptable tolerance of individual values from the average is +0.02.

I certify that the above Dry Gas Meter was calibrated in accordance with USEPA Methods, CFR Title 40, Part 60, Appendix A-3, Method 5, 16.2.3

Signature Todd Brozell

Date 10/23/2013

Type S Pitot Tube Inspection and  
Stack Thermocouple Calibration

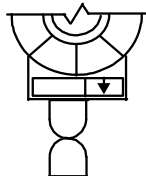
**GENERAL INFORMATION**

Probe ID   
Date

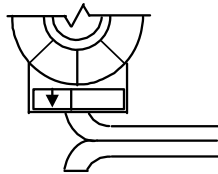
Personnel   
Coefficient Value

**PITOT TUBE INSPECTION**

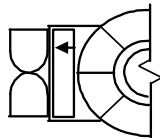
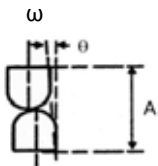
Pitot Tube assembly level? (yes/no)   
Pitot Tube obstruction? (yes/no)   
Pitot Tube openings damaged? (yes/no)



$\alpha_1$    $\leq \pm 10^\circ$   
 $\alpha_2$    $\leq \pm 10^\circ$



$\beta_1$    $\leq \pm 5^\circ$   
 $\beta_2$    $\leq \pm 5^\circ$



$\gamma$    
 $\theta$    
 $z = A \tan (\gamma)$    $\leq \pm \frac{1}{8}"$   
 $\omega = A \tan (\theta)$    $\leq \pm \frac{1}{32}"$

$D_t$    
( $\frac{3}{16}" < D_t < \frac{3}{8}"$  Recommended)

$A$

$P_A$   
 $P_B$    
( $1.05 < P/D_t < 1.50$  Recommended)

**STACK THERMOCOUPLE CALIBRATION**

Ref. Type

Ref. ID

| Source                       | Ref., °F | Stack TC, °F | Abs. Diff., °F |
|------------------------------|----------|--------------|----------------|
| Ice bath                     | 43       | 45           | 2              |
| Ambient                      | 75       | 75           | 0              |
| Hot water                    | 193      | 194          | 1              |
| Maximum Temp. Difference, °F |          |              | 2              |

Type S Pitot Tube Inspection and  
Stack Thermocouple Calibration

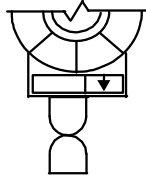
**GENERAL INFORMATION**

Probe ID   
Date

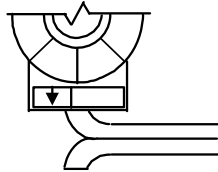
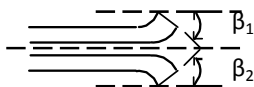
Personnel   
Coefficient Value

**PITOT TUBE INSPECTION**

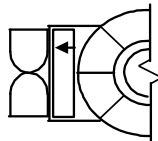
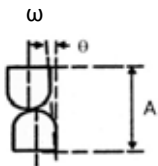
Pitot Tube assembly level? (yes/no)   
Pitot Tube obstruction? (yes/no)   
Pitot Tube openings damaged? (yes/no)



$\alpha_1$    $\leq \pm 10^\circ$   
 $\alpha_2$    $\leq \pm 10^\circ$



$\beta_1$    $\leq \pm 5^\circ$   
 $\beta_2$    $\leq \pm 5^\circ$



$\gamma$    
 $\theta$    
 $z = A \tan (\gamma)$    $\leq \pm \frac{1}{8}"$   
 $\omega = A \tan (\theta)$    $\leq \pm \frac{1}{32}"$

$D_t$    
( $\frac{3}{16}" < D_t < \frac{3}{8}"$  Recommended)

$A$

$P_A$   
 $P_B$    
( $1.05 < P/D_t < 1.50$  Recommended)

**STACK THERMOCOUPLE CALIBRATION**

Ref. Type

Ref. ID

| Source                       | Ref., °F | Stack TC, °F | Abs. Diff., °F |
|------------------------------|----------|--------------|----------------|
| Ice bath                     | 43       | 45           | 2              |
| Ambient                      | 75       | 75           | 0              |
| Hot water                    | 193      | 192          | 1              |
| Maximum Temp. Difference, °F |          |              | 2              |

# Satellite images show link between wood pellet demand and increased hardwood forest harvesting.



A new satellite image analysis, conducted by researchers at Clark University, shows a strong link between wood pellet demand from Enviva's mills in North Carolina and Virginia and hardwood forest harvesting in the area. Specifically, the analysis concludes that the area's ecologically valuable hardwood forests have been harvested at a higher rate since Enviva's pellet mills started operating and consuming primarily hardwoods and that nearly half of this wood is going to Enviva's Ahoskie, Northampton, and Southampton mills, likely contributing to overall declines in carbon stocks in the area's hardwood forests. Additionally, this analysis found—in direct contradiction to repeated industry claims—that from 2001-2016 forest harvesting in Enviva's sourcing area exceeds growth, resulting in a net loss of forested area. Moreover, in the time period after Enviva's three mills started operating (2011-2016), the area's hardwood forests experienced a net loss. Taken together, this analysis (as well as years of photographic evidence) contradicts or otherwise highlights the misleading nature of many of the industry's main arguments. Instead of enhancing forest carbon and decreasing emissions, policies that subsidize large-scale burning of forest biomass undermine global efforts at addressing climate change. Now, at a time when urgent climate action is needed, governments must move away from forest biomass and invest instead in genuine climate solutions.

## Introduction

We are in the midst of a global climate and biodiversity crisis, with scientists warning that we must take critical action now if we hope to minimize some of the worst impacts, such as extreme heat, drought, catastrophic flood, and unprecedented species extinction.<sup>1</sup> Protecting intact forests is of utmost importance to addressing this dual threat, and yet the biomass industry is using trees harvested from the Southeast's natural forests to manufacture wood pellets for use as fuel in power stations. These pellets are overwhelmingly shipped overseas to be burned for electricity as an alternative to coal. However, just like burning fossil fuels, burning forest biomass increases carbon dioxide pollution in the atmosphere, and this increase can persist for several decades or more—far outside of relevant timeframes for climate action.

Wood pellets are made mostly from living trees,<sup>2</sup> which are taken to pellet mills, ground into chips, dried, and formed into pellets. Enviva, the world's largest wood pellet manufacturer, currently operates nine pellet mills throughout the southeast—three of which source wood from forests primarily within the coastal plain area of northeast North Carolina ("NC") and southeast Virginia ("VA").

A new report by researchers at Clark University,<sup>i</sup> commissioned by the Southern Environmental Law Center (“SELC”), takes a closer look at the impacts of wood pellet harvesting on the forests around three of Enviva’s wood pellet mills—which are located in Ahoskie, NC; Northampton, NC; and Southampton, VA (the “three-mill area”). Researchers analyzed satellite images of forests in the sourcing areas of these mills to evaluate forest loss (i.e., harvesting or clearing) over time and by forest type.

The report concludes that:

- Hardwood forest harvesting increased in the three-mill area after Enviva's pellet mills started operating, returning to and then exceeding pre-2008-2010 recession harvest levels.
- From 2011-2016, hardwood forest harvests exceeded growth, resulting in a net loss of hardwood forest cover in the area around Enviva's pellet mills.
- From 2016-2018, Enviva's three mills consumed nearly half of all wood from hardwood forest clearings in the three-mill sourcing area.
- Sourcing for Enviva's mills is likely contributing to overall declines in carbon stocks in hardwood forests in the three-mill area.



When discussing impacts to forests, the industry typically prefers to focus on national or regional trends in forest growth, rather than localized impacts in the sourcing area associated with specific pellet mills. This analysis exposes how such an approach skews conclusions about the industry's impacts on forests and therefore masks its footprint. While Enviva tries to downplay the impact of the pellet industry by stating that wood pellets account for less than 3% of total wood harvesting in the southeast,<sup>3</sup> this analysis shows that when evaluating the actual forests being harvested for biomass, the impact is much larger: Enviva consumed close to half of all wood from hardwood harvesting in the sourcing area around its three pellet mills. Moreover, Enviva often proclaims the climate benefits of its practices by relying in part on the fact that forest growth in the southeast exceeds harvests.<sup>4</sup> Once again this analysis shows this to be misleading—in fact, harvests exceed growth in the actual sourcing area of Enviva's pellet mills.

At a time when we must urgently act to stabilize our climate and protect nature, we must invest in genuinely low-carbon energy sources and protect our natural forests as vital carbon sinks. The results of this analysis add to a large body of research showing that the forest biomass industry is not a climate solution and threatens both goals by driving additional harvesting of natural forests. This further calls into question policies in the European Union and United Kingdom that continue to support and heavily subsidize burning of forest biomass in power stations. It should also give pause to any country, including the United States, that is considering including largescale burning of forest biomass in its energy plans.

## Background

Over the last decade, wood pellet manufacturing in the southeast U.S. has exploded—increasing fivefold from 2012 levels. Most of these pellets are being produced for export overseas, primarily to Europe, where they are burned for energy production under the guise of being clean and climate beneficial. In reality, an established body of scientific research shows that burning forest biomass for electricity increases carbon pollution in the atmosphere for decades or more, exacerbating climate change.<sup>5</sup> In particular, the use of whole hardwood trees taken from clearcut forests has been shown to be the most carbon-intensive form of biomass, increasing

<sup>i</sup> The full report is available at <https://selc.link/3Bm7bKf>.



carbon pollution for nearly a century.<sup>6</sup> Biomass sourced in this way routinely enters energy supply chains in the U.K. and other top biomass-importing countries in Europe.<sup>7</sup>

Despite the detrimental effects of the industry on the climate, the woody biomass industry is supported by billions of dollars annually in E.U. and U.K. subsidies that are aimed at addressing climate change. Biomass energy producers are able to receive these subsidies if they can demonstrate on paper that the wood pellets they are burning meet specified “sustainability criteria.” However, these criteria do not address lifecycle carbon emissions and most importantly fail to account for the CO<sub>2</sub> emissions from burning the pellets.<sup>8</sup> As a result, the industry receives massive subsidies despite increasing carbon in the atmosphere.<sup>9</sup>

## Enviva Pellets

Enviva, a primary supplier to Drax’s U.K. power plant,<sup>10</sup> has been operating pellet mills in the Southeast U.S. for over ten years. Its flagship facility in Ahoskie, NC began manufacturing wood pellets in 2011, and was followed shortly thereafter by Enviva’s Northampton, NC (early 2013) and Southampton, VA (late 2013) mills. As originally constructed, these three pellet mills had a combined production capacity of 1.4 million metric tons per year, but now have an annual production capacity of over 1.9 million metric tons after receiving permits authorizing expansions at two mills. In 2016, Enviva started operating its Sampson, NC mill and then a mill in Hamlet, NC in 2019.

Since 2013, multiple independent, on-the-ground investigations have uncovered destructive sourcing practices used to supply wood to Enviva’s NC and VA mills.<sup>11</sup> These investigations found that Enviva’s mills routinely source whole trees and other large-diameter wood (rather than claimed “residues” or “wastes”), and that many of these trees are taken from clearcuts of ecologically valuable and highly biodiverse natural upland and lowland hardwood forests, including bottomland hardwood and other wetland forests. These forests, located in the North American Coastal Plain global biodiversity hotspot, are some of North America’s most valuable ecosystems; they provide key habitat to many at-risk species, including migratory songbirds, purify the air and improve water quality, and store large amounts of carbon.

Despite this and other evidence, Enviva continues to argue that its practices are not harmful to forests or the climate. The company even suggests that demand for wood pellets is actually benefiting forests by providing a market to keep and grow forests. Specifically, Enviva has repeatedly argued that it is not “driving harvests”<sup>12</sup> and that “forest inventories have increased” since Enviva began operating.<sup>13</sup> However, evidence on the ground suggests that these claims may be untrue in certain sourcing areas. To date, however, there has not been a large-scale quantitative measurement of the impacts of wood pellet demand on the pattern and rate of forest clearings by forest type and whether forest harvesting has increased in pellet mill sourcing areas. Researchers at Clark University undertook to answer these questions through an analysis of satellite images, the results of which were compiled into a final report: *Forest Clearing Rates in the Sourcing Region for Enviva Pellet Mills in Virginia and North Carolina, U.S.A.*

## Satellite Image Analysis

**Methodology:** The report utilized best-available satellite data to map the harvesting of forests in the sourcing region for Enviva’s three pellet mills in northeastern NC and southeastern VA. First, Clark University researchers analyzed harvesting over key time periods to detect whether harvesting has increased concurrent with mill operations.<sup>ii</sup> Given that these three mills heavily rely on hardwood tree species,<sup>iii</sup> this analysis looked at harvesting rates by forest types to see if impacts of the pellet mills’ operations are more strongly associated with certain types of forests in the area. To test the relationship between its findings and pellet mill (*continue on page 5*)

<sup>ii</sup> Clark University researchers used satellite data from Global Forest Watch and the National Land Cover Dataset. The analysis excluded forest disturbance and forest clearing events that are not likely to be related to market-driven biomass supply for wood products (e.g., developed areas, wildfires, and protected/non-harvestable land). For more information about the methodology, please see the full report.

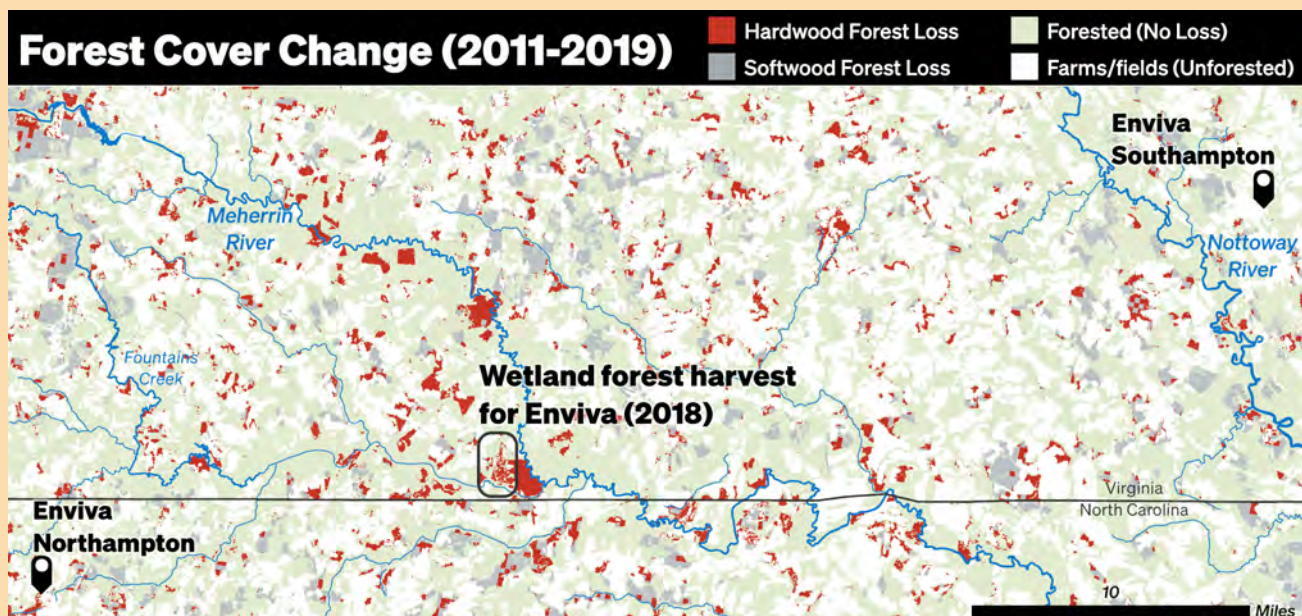
<sup>iii</sup> The most recent Enviva-reported data shows the following hardwood percentages at these mills: Southampton (91%), Northampton (72%), and Ahoskie (63%). This information comes from Enviva’s Supply Base Reports submitted to the Sustainable Biomass Program in 2020.

## Satellite Images Confirm Investigation into Enviva's Use of Valuable Wetland Forests

In 2018, the U.K.'s Channel 4 "Dispatches" program conducted an independent investigation into Enviva's sourcing practices in NC and VA. This investigation identified an active clearcut of a mature wetland forest located less than half a mile from the Meherrin River in VA. Logging trucks carrying whole hardwood trees and other large-diameter wood were traced from this clearcut and documented entering Enviva's Southampton, VA pellet mill.\*



Data from the satellite analysis confirmed that prior to the 2018 harvest this area was a forested wetland, comprised primarily of oak/gum/cypress tree species. Moreover, as shown below, this harvest site is located in an area along the NC and VA border that has experienced significant loss of hardwood forest cover from 2011-2019, according to the satellite image analysis.



\* Anthony Barnett, *Dispatches: The True Cost of Green Energy*, Channel 4 (aired Apr. 16, 2018), <https://ecostorm.tv/2018/04/16/the-real-cost-of-green-energy-dispatches/>; see also note 7.



demand, the researchers utilized a time-series analysis—looking at both a pre-pellet mill and pre-recession time period (2004-2008) and a post-pellet mill period (2013-2018).<sup>iv</sup> Second, as part of a separate analysis, the researchers analyzed annual harvesting and growth rates from 2001 to 2016 in order to assess the potential net forest loss in the area over time. Finally, as part of both of these analyses, the researchers also looked at forest cover data around Enviva’s Sampson, NC mill (the “Sampson area”), which commenced operations in the southeastern portion of the state in 2016.

*Hardwood Harvesting & Pellet Demand:* The analysis found an increase in forest harvesting in both the three-mill sourcing area and the Sampson area after Enviva’s respective pellet mills started operating, showing a clear connection between demand for wood for the pellet mills and forest harvesting.

The rate of harvesting<sup>v</sup> of the area’s hardwood (i.e., deciduous) forests were the most telling results of this analysis. Enviva’s own self reporting demonstrates that its Ahoskie, Northampton, and Southampton mills rely predominately on hardwoods, and the satellite imagery analysis confirmed that the rate of hardwood forest harvesting increased in the area around these mills after Enviva’s pellet mills started operating.

As shown in the table below, although hardwood harvesting in the area was relatively high around 2004-2008, harvesting dropped during the recession and subsequent closure of the Franklin, VA hardwood pulp mill. This analysis shows that with Enviva’s demand for wood, not only did the hardwood forest harvesting rate in the area return to pre-recession levels but it ultimately exceeded those levels by 2016 and through 2018. The report’s authors thus concluded that, “[I]t is very likely that the initiation of the pellet mill operations contributed to elevated rates of deciduous forest clearing in the [three]-mill region beginning in the 2010s, and in the [Sampson] region beginning in 2016.”<sup>14</sup>

| Annual Hardwood Forest Harvesting Rates Over Time |                                |                                                                     |      |                                                 |      |                                                   |      |
|---------------------------------------------------|--------------------------------|---------------------------------------------------------------------|------|-------------------------------------------------|------|---------------------------------------------------|------|
|                                                   | Forest Area<br>in 2000<br>[ac] | 2004-2008<br>(Pre-Recession &<br>Pre-Pellet)<br>[ac/yr]      [%/yr] |      | 2009-2012<br>(Recession)<br>[ac/yr]      [%/yr] |      | 2013-2018<br>(Post-Pellet)<br>[ac/yr]      [%/yr] |      |
| Three-Mill                                        | 2,624,986                      | 40,587                                                              | 1.5% | 30,075                                          | 1.1% | 42,994                                            | 1.6% |
| Sampson                                           | 1,324,895                      | 17,381                                                              | 1.3% | 16,316                                          | 1.2% | 22,185                                            | 1.7% |

Forest area in 2000 and the average annual rate of gross hardwood forest harvesting in select time periods for the three-mill and Sampson regions.

This same pattern held true in the Sampson sourcing area, reflecting the impacts on hardwood forests from Enviva’s Sampson mill coming online in 2016. From 2004 to 2015, hardwood harvesting in this region ranged from 1.2% to 1.5% per year, but harvesting increased to 1.9% per year from 2016 to 2018 after Sampson started operating.

These findings, and the direct relationship between the increased harvesting levels and demand from Enviva’s pellet mills, are further supported by the U.S. Forest Service’s Timber Products Output (“TPO”) data.<sup>15</sup> As shown in Figure 1, harvesting for bioenergy/fuelwood in the three-mill area increased from just over 500,000 green tons in 2011 to 4.8 million green tons in 2019.<sup>16</sup> Similarly, harvesting for bioenergy/fuelwood in the Sampson region increased from 155,000 green tons in 2011 to 1.8 million green tons in 2019, with a marked increase after the Sampson mill started operating.<sup>vi</sup>

<sup>iv</sup> Although this first analysis was focused on forest loss in the three-mill area, as noted, researchers at Clark University wanted to be able to also assess the impact of the Sampson mill’s more recent activity. To do so, they separated the post-pellet time period into two ranges, with 2013-2015 representing the time immediately after the three mills started operating and 2016-2018 representing the time after all of the mills, including Sampson, were online.

<sup>v</sup> The forest harvesting rate is calculated by dividing the area of forest cleared in a given year by the area of forest in 2000, the baseline for the analysis.

<sup>vi</sup> Review of the TPO data was separate from the analysis conducted by Clark University researchers.

## U.S. Forest Service Data Reveals Enviva's Reliance on Sawtimber Trees—Not Low Value or Waste Materials

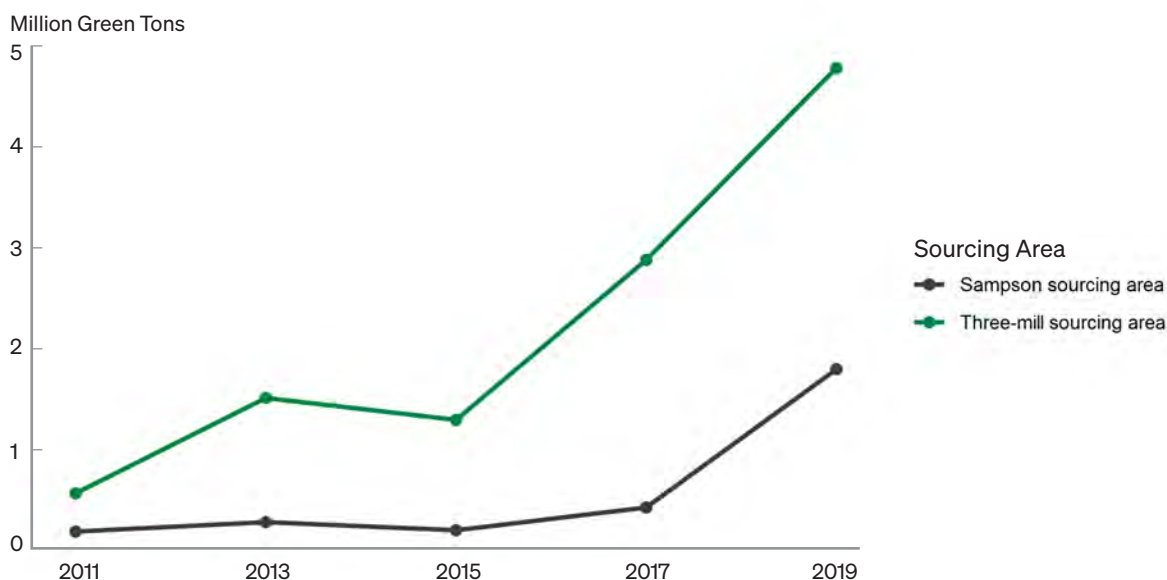
As part of the U.S. Forest Service's Forest Inventory and Analysis ("FIA") program, the Service compiles the TPO dataset. SELC's geospatial analysts reviewed the TPO data from 2001 to 2019 for the counties in NC and VA that fall within the three-mill and Sampson sourcing areas identified by researchers at Clark University. To assess the impact of Enviva's pellet mills, this analysis focused on the TPO removal or harvest category called "bioenergy/fuelwood," which includes all harvesting to manufacture wood pellets as well as other fuelwood uses such as industrial boiler fuels at mills. Based on Enviva's self-reported data regarding its feedstock use at the relevant pellet mills, wood pellet production appears to be the single largest use of wood harvested as "bioenergy/fuelwood."

Review of this TPO data reinforces the findings of the satellite image analysis and further underscores what on-the-ground investigations have shown for years—Enviva's pellet mills in northeastern NC and southeastern VA rely heavily on larger-diameter hardwood trees—and directly contradicts Enviva's repeated claims that its pellet mills use wastes, residues, and low-value roundwood.

FIGURE 1

### Forest Harvesting for Bioenergy/Fuelwood

Wood pellet sourcing areas, 2011-2019



Moreover, a closer look at hardwood harvesting for bioenergy/fuelwood in the three-mill sourcing area shows that the overwhelming majority (approx. 84%) of hardwood material comes from larger diameter whole trees that could otherwise be used for sawtimber.\* Given the share of this material going to Enviva's Ahoskie, Northampton, and Southampton mills, this data slams the door firmly shut on Enviva's claims that its pellet mills rely predominately on wastes, residues, and low-value roundwood that has no other use.

The U.S. Forest Service categorizes the hardwood material harvested as either "non-growing stock," which includes tops, limbs, stumps, and crooked or rotten "cull" trees (what Enviva refers to as "low value") or "growing stock," which is the main bole of the tree. The growing stock is then divided into two categories depending on the size of the tree, with the larger diameter trees categorized as "sawtimber growing stock" and the smaller diameter trees categorized as "poletimber growing stock." As shown in Figure 2, only a small fraction

\* The Service defines sawtimber trees as live trees with a diameter outside bark (d.o.b.) of at least 11 inches for hardwood and 9 inches diameter at breast height (d.b.h.) for softwood. These are larger than poletimber trees. U.S. Forest Service, *Forest Inventory & Analysis Glossary*, <https://www.nrs.fs.fed.us/fia/data-tools/state-reports/glossary/>.

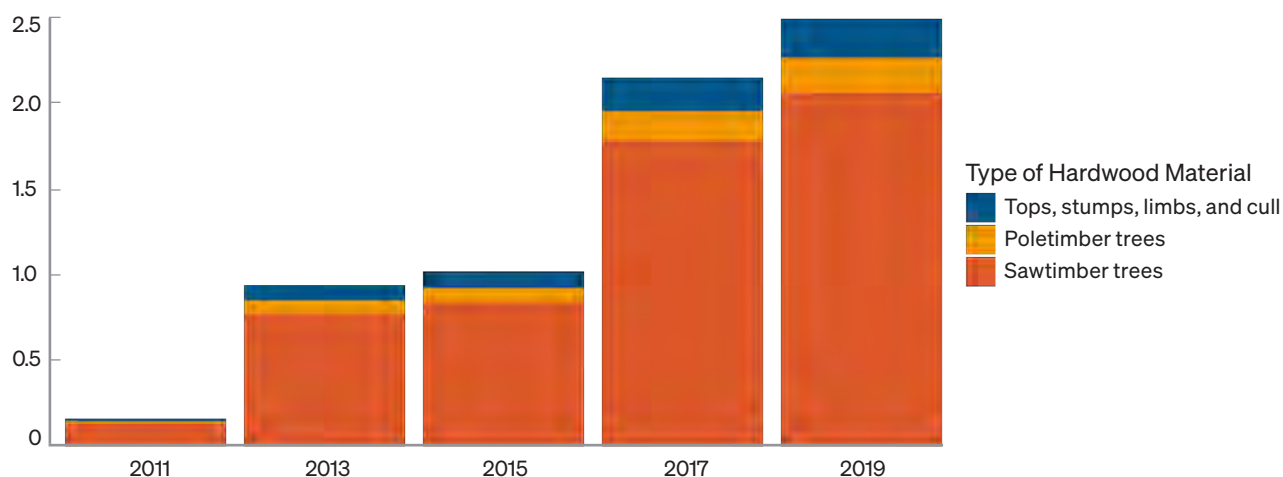
of the hardwood material harvested for bioenergy/fuelwood comes from the non-growing stock category. Instead, this material is almost exclusively from trees classified as sawtimber.

FIGURE 2

### Type of Hardwood Material Harvested for Bioenergy/Fuelwood

Three-mill sourcing area, 2011-2019

Million Green Tons



## Net Forest Loss

The first part of the satellite analysis, discussed above, looked at the gross rates of forest clearings to assess whether and to what extent demand for wood for Enviva's pellet mills has impacted forest harvesting rates in the region. Separately, the Clark University researchers also assessed the average net value of forested area within the three-mill region through 2016.<sup>vii</sup> This distinct analysis compared annual rates of forest harvesting with gains to determine whether the area's forests have experienced a net loss over time.

The analysis found that from 2001-2016, the amount of forests being harvested exceeded any new growth in the three-mill region, resulting in a net loss of forested area. Specifically, the forested area decreased annually by 4,467 acres during this time period (for a loss of 1.18%), with losses concentrated in the area's deciduous, mixed, and woody wetland forests. Similarly, a net loss of forested area was also shown in the Sampson sourcing area over this same time period. Moreover, in the years following Enviva's operation of the Ahoskie, Northampton, and Southampton mills (from 2011-2016), hardwood forests in the area around the mills also experienced a net loss. In that six-year period, the area's deciduous, mixed, and woody wetland forests decreased by almost 28,000 acres (4,638 acres/year).<sup>viii</sup> Loss to the area's natural hardwood forests is particularly concerning—biodiversity at the landscape scale, in form of diverse forest types, provides important ecosystem services, including habitat for a rich variety of wildlife, resistance against pests and climate stressors, water and nutrient cycling, and beyond.

Based on these findings, and in direct contrast to Enviva's repeated assertions, the report's authors conclude that, "pellet mill operations do not appear to have induced an increase in forestland area within the [three-mill] region, and in fact deciduous forestland saw a sizeable and steady decline."<sup>17</sup>

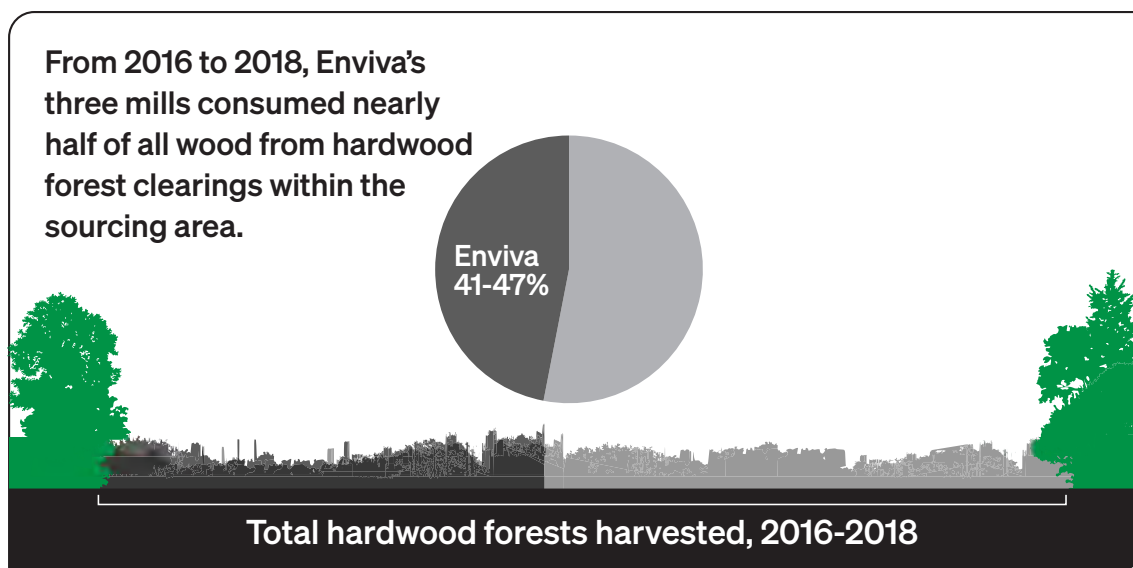
<sup>vii</sup> Satellite images related to forest gains were only available through 2016.

<sup>viii</sup> A small net gain in the area's softwood forests during this time resulted in a minimal overall increase in forested area in the area from 2011-2016 (approx. 0.14%), although as noted above the area's hardwood forests experienced a net loss.

## Enviva's Consumption

In addition to analyzing the amount of hardwood forest harvesting occurring in the three-mill region, the report was also able to conclude that from 2016 to 2018 Enviva's Ahoskie, Northampton, and Southampton mills consumed between 41% and 47% of all woody materials from hardwood forest harvesting within the three-mill area.

This conclusion is based on Enviva's own self-reported data regarding the sourcing practices of these three mills, including the amount of materials consumed by these mills during the relevant time period (between 2.33 and 2.66 million green tonnes per year), the percentage of this material that came directly from the forests (87%), and the percentage of this material that came from hardwood species (78%).<sup>18</sup> Using all of this data, the report's authors estimate that approximately 68% of Enviva's feedstock would have come to the mills directly from recent hardwood harvests in the area. Comparing that to the results of the satellite analysis, they conclude that, "pellet mill operations consume a correspondingly large fraction of the total deciduous forest clearing within the [three-mill] region."<sup>19</sup>



## Forest Carbon Stocks

Finally, although a detailed assessment of forest carbon stocks was not a part of this analysis, with the information obtained during the study regarding forest harvesting rates, declining hardwood forest cover, and the percentage of hardwood harvesting going to Enviva, the report's authors were able to conclude that, "it is likely that Enviva sourcing is contributing to overall declining carbon stocks in deciduous forests in the [three]-mill area."<sup>20</sup> This conclusion is further supported by recent research by the Woodwell Climate Research Center and Chatham House, which countered industry claims that biomass demand incentivizes landowners to keep or even expand their forests, stating:

*"These claims are based on economic theory and are not consistent with the empirical evidence, which suggests the opposite. Demand for wood for energy leads to a reduction in the forest carbon stored because the total area and volume harvested increases to meet this demand."*<sup>21</sup>

Enviva itself has acknowledged that in situations such as these, the use of wood pellet biomass is not beneficial to the climate: "If growth and sequestration are not keeping up with harvest, then we agree that the emissions from biomass combustion should not be treated as climate friendly."<sup>22</sup>

## Conclusion

While Enviva and others in the industry like to point out that wood pellet harvesting only accounts for a small percentage of overall harvesting in the Southeast, such a region-wide approach masks the impacts this industry is having on our natural forests. When researchers zoomed in to examine the forests directly harvested for these pellet mills, as in the satellite image analysis, the results show a strong link between the operation of Enviva's Northampton, Ahoskie, and Southampton mills and increased rates of hardwood forest harvesting in the area. The analysis also found that "a correspondingly large fraction" (41-47%) of all hardwood material being cleared in the area was being consumed by Enviva for use in pellet manufacturing and that over time the area's forests, including its ecologically valuable hardwood forests, have experienced a net loss in forest cover.

Urgent climate action is needed now. This must include a drastic reduction in emissions, as well as significant increases in forest carbon sinks. Indeed, all the pathways identified by the IPCC to address the climate crisis in its 2018 special report on keeping global warming below 1.5°C involve both. The forest biomass industry sets back efforts on both sides of this equation, increasing carbon dioxide in the atmosphere as pellets are burned in power stations to produce electricity and contributing to overall declining carbon stocks in the forests supplying trees for the production of wood pellets. To address the climate emergency, subsidies for the large-scale use of forest-biomass for energy must be ended and countries like the U.S. must avoid putting in place similar policies or incentives for this false solution, favoring instead genuine solutions like wind, solar, and battery storage.

## Endnotes

- <sup>1</sup> Intergovernmental Panel on Climate Change (IPCC), *Climate Change 2021: The Physical Science Basis Summary for Policymakers* (2021), [https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC\\_AR6\\_WGI\\_SPM\\_final.pdf](https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM_final.pdf); IPCC & Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES), *Biodiversity and Climate Change Workshop Report* (2021), [https://ipbes.net/sites/default/files/2021-06/20210609\\_workshop\\_report\\_embargo\\_3pm\\_CEST\\_10\\_june\\_0.pdf](https://ipbes.net/sites/default/files/2021-06/20210609_workshop_report_embargo_3pm_CEST_10_june_0.pdf).
- <sup>2</sup> See Enviva, *Track & Trace*, <https://www.envivabiomass.com/sustainability/responsible-sourcing/track-trace/> (last visited Feb. 18, 2022) (reporting approximately 75% of material coming directly from forests); Drax, *Annual Report and Accounts 2020* at 54 (2021), [https://www.drax.com/wp-content/uploads/2021/03/Drax\\_AR2020.pdf](https://www.drax.com/wp-content/uploads/2021/03/Drax_AR2020.pdf) (reporting over 60% US-derived pellets from whole trees).
- <sup>3</sup> Enviva Partners, LP, *Business Overview Presentation* at Slide 19 (June 14, 2021), [https://s28.q4cdn.com/898203682/files/doc\\_presentation/2021/06/EVA-Investor-Presentation-June-14-2021-FINAL.pdf](https://s28.q4cdn.com/898203682/files/doc_presentation/2021/06/EVA-Investor-Presentation-June-14-2021-FINAL.pdf).
- <sup>4</sup> See, e.g., Holly Taylor, *Enviva Official Addresses Concerns from CNN Article*, Roanoke-Chowan News Herald (Aug. 17, 2021), <https://www.roanoke-chowannewsherald.com/2021/08/17/enviva-official-addresses-concerns-from-cnn-article/> (“During the last 20 years, even after accounting for all the forest uses by the forest products industry, forest growth has exceeded removals by nearly 50 percent.”).
- <sup>5</sup> See, e.g., Thomas Buchholz et al., *When Biomass Electricity Demand Prompts Thinnings in Southern US Pine Plantations: A Forest Sector Greenhouse Gas Emissions Case Study*, Front. For. Glob. Change (2021), <https://doi.org/10.3389/ffgc.2021.642569>; John D. Sterman et al., *Does Replacing Coal with Wood Lower CO2 Emissions? Dynamic Lifecycle Analysis of Wood Bioenergy*, 13 *Envtl. Res. Letters* (2018), <http://iopscience.iop.org/article/10.1088/1748-9326/aaa512/meta>; Duncan Brack, *Woody Biomass for Power and Heat: Impacts on the Global Climate* (2017), <https://www.chathamhouse.org/publication/woody-biomass-power-and-heat-impacts-global-climate>.
- <sup>6</sup> Spatial Informatics Group, *Carbon Emission Estimates for Drax Biomass Powerplants in the UK Sourcing from Enviva Pellet Mills in U.S. Southeast Hardwoods using the BEAC Model* (2015), [https://www.southernenvironment.org/wp-content/uploads/legacy/news-feed/SIG\\_BEAC\\_calculations\\_SE\\_hardwoods\\_2015-05-27.pdf?cachebuster=11](https://www.southernenvironment.org/wp-content/uploads/legacy/news-feed/SIG_BEAC_calculations_SE_hardwoods_2015-05-27.pdf?cachebuster=11).
- <sup>7</sup> See, e.g., Alex Thomson, *Fears Biomass Green Revolution Could be Fuelling Habitat Loss*, Channel 4 (July 5, 2021), <https://www.channel4.com/news/fears-biomass-green-revolution-could-be-fuelling-habitat-loss>; Dogwood Alliance, NRDC, Southern Environmental Law Center, *Global Markets for Biomass Energy are Devastating U.S. Forests* (2019), [https://www.southernenvironment.org/wp-content/uploads/2021/11/2019-Updated-Investigation-Booklet\\_Wood-Pellets-in-SE-US.pdf](https://www.southernenvironment.org/wp-content/uploads/2021/11/2019-Updated-Investigation-Booklet_Wood-Pellets-in-SE-US.pdf) (hereinafter, “Biomass Investigation Booklet”).
- <sup>8</sup> Duncan Brack, Richard Birdsey, & Wayne Walker, *Greenhouse Gas Emissions from Burning US-Sourced Woody Biomass in the EU and UK* (Oct. 2021), <https://www.chathamhouse.org/2021/10/greenhouse-gas-emissions-burning-us-sourced-woody-biomass-eu-and-uk>.
- <sup>9</sup> *Id.*
- <sup>10</sup> See Enviva Business Overview, *supra* note 3, at Slide 23.
- <sup>11</sup> See, e.g., Biomass Investigation Booklet, *supra* note 7.
- <sup>12</sup> See, e.g., Johanna F. Still, *Environmentalists Condemn Wilmington Wood Pellet Exporter Whose Mission is to Reduce CO2 Emissions*, Port City Daily (Oct. 20, 2021), <https://portcitydaily.com/deep-dives/2021/10/20/environmentalists-condemn-wilmington-wood-pellet-exporter-whose-mission-is-to-reduce-co2-emissions/> (Enviva’s Director of Sustainability: “We don’t drive the harvest.”); Enviva, *White Paper – Seeing the Forest: Sustainable Wood Bioenergy in the Southeast United States* at 21 (May 2020), <https://www.envivabiomass.com/wp-content/uploads/white-paper-seeing-the-forest.pdf>.
- <sup>13</sup> Enviva, *Sustainable Forestry*, <https://www.envivabiomass.com/sustainability/forests/> (last visited Feb. 18, 2022) (“In areas where we operate, we can show that forest inventory has increased after we arrive.”).
- <sup>14</sup> Christopher A. Williams, *Forest Clearing Rates in the Sourcing Region for Enviva Pellet Mills in Virginia and North Carolina, U.S.A.* at 10 (Dec. 2021), <https://selc.link/3Bm7bKf>.
- <sup>15</sup> U.S. Forest Service, *Timber Products Output* (2001-2019), data downloaded from <https://usfs-public.app.box.com/s/y4ziirdb9v7zardus0cuajh7ziy9b2id>.
- <sup>16</sup> See N.C. Dep’t of Envtl. Quality, *North Carolina GHG Inventory* at 72 (2022), <https://deq.nc.gov/media/27070/download?attachment> (noting that from 2011 to 2018, “although total roundwood production has increased by about a third during this period, roundwood production for bioenergy/fuelwood has increased by more than a factor of five”).
- <sup>17</sup> Williams, *supra* note 14, at 25.
- <sup>18</sup> Sustainable Biomass Program, *Supply Base Report: Enviva Pellets Southampton, LLC, Fourth Surveillance Audit* (2019), available at <https://sbp-cert.org/certificate-holders/#4435>; Sustainable Biomass Program, *Supply Base Report: Enviva Pellets Northampton, LLC, Fourth Surveillance Audit* (2019), available at <https://sbp-cert.org/certificate-holders/#4310>; Sustainable Biomass Program, *Supply Base Report: Enviva Pellets Ahoskie, LLC, Fourth Surveillance Audit* (2019), available at <https://sbp-cert.org/certificate-holders/#4347>.
- <sup>19</sup> Williams, *supra* note 14, at 25.
- <sup>20</sup> *Id.*
- <sup>21</sup> Brack et al., *supra* note 8, at 16.
- <sup>22</sup> Enviva White Paper, *supra* note 12, at 15.



**SOUTHERN  
ENVIRONMENTAL  
LAW  
CENTER**  
[southernenvironment.org](https://southernenvironment.org)

**For more information, contact**

**Heather Hillaker**  
Staff Attorney  
Southern Environmental Law Center  
919-967-1450  
[hhillaker@selcnc.org](mailto:hhillaker@selcnc.org)

## **AIR EMISSION TEST REPORT**

### **Amory, Mississippi Wood Pellet Production Facility Enviva Pellets Amory, LLC**

Submitted to

Enviva Pellets Amory, LLC

Submitted by

Air Control Techniques, P.C.  
301 East Durham Road  
Cary, NC 29513  
(919) 460-7811

Report Submittal Date: October 31, 2013  
(Revised November 14, 2013)  
Air Control Techniques, P.C. File 1909





## TABLE OF CONTENTS

|                   |                                                               |           |
|-------------------|---------------------------------------------------------------|-----------|
| <b>1.</b>         | <b>Summary</b>                                                | <b>1</b>  |
| <b>2.</b>         | <b>Emission Test Program Description</b>                      | <b>2</b>  |
|                   | 2.1 Amory, Mississippi Plant Description                      | 2         |
|                   | 2.2 Purpose and Scope of the Emission Test Program            | 2         |
|                   | 2.3 Test Participants                                         | 2         |
| <b>3.</b>         | <b>Test Matrix and Test Results</b>                           | <b>4</b>  |
|                   | 3.1 Test Matrix                                               | 4         |
|                   | 3.2 Test Results                                              | 4         |
|                   | 3.3 Emission Data Evaluation                                  | 9         |
|                   | 3.4 VOC and HAP Emission Summary                              | 11        |
| <b>4.</b>         | <b>Sampling Locations</b>                                     | <b>12</b> |
|                   | 4.1 Dryer Stack Sampling Location                             | 12        |
|                   | 4.2 Dry Hammermill Stack Sampling Location                    | 13        |
|                   | 4.3 Aspiration System Sampling Location                       | 14        |
|                   | 4.4 Green Hammermill Stack Sampling Location                  | 15        |
| <b>5.</b>         | <b>Testing Procedures</b>                                     | <b>16</b> |
|                   | 5.1 Flue Gas Velocity and Volumetric Flow Rate – EPA Method 2 | 16        |
|                   | 5.2 Flue Gas Composition and Molecular Weight – EPA Method 3  | 16        |
|                   | 5.3 Flue Gas Moisture – EPA Method 4                          | 16        |
|                   | 5.4 Total Hydrocarbon Concentrations – EPA Method 25A         | 16        |
|                   | 5.5 Organic HAPs – EPA Method 320                             | 17        |
| <b>6.</b>         | <b>Quality Assurance</b>                                      | <b>19</b> |
|                   | 6.1 Method 1 Quality Assurance                                | 19        |
|                   | 6.2 Method 4 Quality Assurance                                | 19        |
|                   | 6.3 Method 25A Quality Assurance                              | 19        |
|                   | 6.4 Method 320 Quality Assurance                              | 22        |
| <b>7.</b>         | <b>Process Documentation</b>                                  | <b>25</b> |
| <b>8.</b>         | <b>References</b>                                             | <b>26</b> |
| <b>Appendices</b> |                                                               |           |
|                   | <b>A. Moisture and Gas Flow Rate Data</b>                     |           |
|                   | <b>B. Method 25A Data</b>                                     |           |
|                   | <b>C. Method 320 Data</b>                                     |           |
|                   | <b>D. Method 320 Log Sheet</b>                                |           |
|                   | <b>E. Example Calculations</b>                                |           |
|                   | <b>F. Gas Cylinder Certification Sheets</b>                   |           |
|                   | <b>G. Equipment Calibration Sheets</b>                        |           |



**TABLES**

|      |                                                                                                                                                                           |    |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
| 1-1. | Total Emissions at Plant Permit Limit of 99,000 Tons/Year for the Dryer (dryer outlet) and Green Hammermill and 8,760 hours per year for the Dry Hammermill and Aspirator | 1  |
| 3-1  | Test Matrix, Air Emission Testing, Enviva Pellets Amory, MS                                                                                                               | 4  |
| 3-2  | Dryer Emission Test Results                                                                                                                                               | 5  |
| 3-3  | Green Hammermill Emission Test Results                                                                                                                                    | 6  |
| 3-4  | Aspiration System Emission Test Results                                                                                                                                   | 7  |
| 3-5  | Dry Hammermill Emission Test Results                                                                                                                                      | 8  |
| 3-6  | Alpha-Pinene Method 25A Response Factors                                                                                                                                  | 9  |
| 3-7  | Calculated Method 25A Response Factors in Phase I Laboratory Tests                                                                                                        | 10 |
| 3-8. | Total Emissions at Plant Permit Limit of 99,000 Tons/Year for the Dryer (dryer outlet) and Green Hammermill and 8,760 hours per year for the Dry Hammermill and Aspirator | 11 |
| 6-1  | Dryer Quality Assurance Results, Total Hydrocarbons, Method 25A                                                                                                           | 20 |
| 6-2  | Dry Hammermill Quality Assurance Results, Total Hydrocarbons, Method 25A Low Range                                                                                        | 20 |
| 6-3  | Dry Hammermill Quality Assurance Results, Total Hydrocarbons, Method 25A High Range                                                                                       | 21 |
| 6-4  | Aspirator System Quality Assurance Results, Total Hydrocarbons                                                                                                            | 21 |
| 6-5  | Green Hammermill Quality Assurance Results, Total Hydrocarbons, Method 25A                                                                                                | 22 |
| 6-6  | CTS Results, Method 320                                                                                                                                                   | 23 |
| 6-7  | Spike Recovery Results, Method 320                                                                                                                                        | 23 |

**FIGURES**

|     |                                                                   |    |
|-----|-------------------------------------------------------------------|----|
| 4-1 | Dryer Stack Sampling Location                                     | 12 |
| 4-2 | Photograph of the Dryer Stack                                     | 12 |
| 4-3 | Dry Hammermill Stack Sampling Location                            | 13 |
| 4-4 | Photograph of the Dry Hammermill Sampling Location                | 13 |
| 4-5 | Pellet Mill Aspiration System Sampling Location                   | 14 |
| 4-6 | Photograph of the Pellet Mill Aspiration System Sampling Location | 14 |
| 4-7 | Green Hammermill Stack Sampling Location                          | 15 |
| 4-8 | Photograph of the Green Hammermill Stack Sampling Location        | 15 |
| 5-1 | Method 320 Organic HAP Sampling System                            | 17 |

## Definitions

|                            |                                                                                                                                                                                                                                                                                                                              |
|----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Total Hydrocarbons         | All organic compounds containing hydrogen and carbon that are detected by a flame ionization detector operated in accordance with U.S. EPA Method 25A.                                                                                                                                                                       |
| Volatile Organic Compounds | All organic compounds that are emitted to the atmosphere in a gaseous or vapor form that can participate in photochemical reactions to produce ozone. All volatile organic compounds are considered VOCs unless specifically exempted in 40 CFR 51.100(s). Relevant excluded compounds include methane, ethane, and acetone. |
| VOC Emissions              | Mass emissions of VOC measured on a pounds of carbon basis.                                                                                                                                                                                                                                                                  |

## Acronyms

|      |                                                 |
|------|-------------------------------------------------|
| DHM  | Dry Hammermill                                  |
| EPA  | U.S. Environmental Protection Agency            |
| FID  | Flame Ionization Detector                       |
| FTIR | Fourier Transform Infrared Spectrometer         |
| GHM  | Green Hammermill                                |
| HAP  | Hazardous Air Pollutant                         |
| MC   | Moisture Content                                |
| MDEQ | Mississippi Department of Environmental Quality |
| ODT  | Oven Dried Tons                                 |
| THC  | Total Hydrocarbons                              |
| VOC  | Volatile Organic Compounds                      |
| C1   | Carbon                                          |

## Units of Measure

|                    |                               |
|--------------------|-------------------------------|
| ppm                | Parts per million (wet basis) |
| ppmvd              | Parts per million (dry basis) |
| ppm C <sub>3</sub> | Parts per million as propane  |
| ppm C <sub>1</sub> | Parts per million as carbon   |
| mg                 | Milligram                     |
| kg                 | Kilogram                      |
| µg                 | Micrograms                    |

## Permit Designations/Titles

|                   |                                                                        |
|-------------------|------------------------------------------------------------------------|
| Green Hammermill  | AA-001, Wet Wood Hammermill                                            |
| Dryer             | AA-002, Wood-Fired Rotary Dryer                                        |
| Dry Hammermill    | AA-003, Dry Wood Hammermill                                            |
| Aspiration System | AA-004, Pellet Cooler Process and AA-005 Pellet Mill Aspiration System |

## Air Emission Test Report Amory, Mississippi Wood Pellet Production Facility

### 1. SUMMARY

Enviva Pellets, Amory, LLC (Enviva) has sponsored air emission testing to satisfy the requirements of Agreed Order 6267-13 dated June 16, 2013 (the “Order”). These test results are being submitted to the Mississippi Department of Environmental Quality (MDEQ) by October 31, 2013 in accordance with the Order.

The scope of the testing program included volatile organic compounds (VOCs) and six organic hazardous air pollutants (HAPs). Annual emissions of each analyte have been calculated and compared to applicable permit limits. The results of the testing program are summarized in Table 1-1 based on the present maximum permitted production limit of 99,000 output tons per year in the permit.

| Table 1-1. Total Emissions at Plant Permit Limit Of 99,000 Tons/Year (dryer outlet) for the Dryer and Green Hammermill and 8,760 hours for the Dry Hammermill and Aspirator |       |                |                  |           |       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|----------------|------------------|-----------|-------|
| Analyte                                                                                                                                                                     | Dryer | Dry Hammermill | Green Hammermill | Aspirator | Total |
| Total VOC                                                                                                                                                                   | 29.9  | 41.72          | 12.71            | 100.89    | 185.3 |
| Methanol                                                                                                                                                                    | 2.50  | 0.34           | 1.37             | 0.73      | 4.94  |
| Acetaldehyde                                                                                                                                                                | 0.00  | 0.00           | 0.00             | 0.00      | 0.00  |
| Acrolein                                                                                                                                                                    | 0.00  | 0.00           | 0.00             | 0.00      | 0.00  |
| Formaldehyde                                                                                                                                                                | 0.64  | 0.00           | 0.00             | 0.00      | 0.64  |
| Phenol                                                                                                                                                                      | 0.00  | 0.00           | 0.00             | 0.00      | 0.00  |
| Propionaldehyde                                                                                                                                                             | 0.00  | 0.00           | 0.00             | 0.00      | 0.00  |
| Total HAPS                                                                                                                                                                  | 3.14  | 0.34           | 1.37             | 0.73      | 5.58  |

At the current maximum permitted production limit, VOC emissions are above the facility wide limit of 99.0 tons per year but are below the PSD threshold of 250 tons per year. The total HAP emissions are under 25 tons per year, and each of the HAPs has an emission rate less than 10 tons per year.

The air emission tests were conducted by Air Control Techniques, P.C. using EPA Reference Methods 1, 2, 3, 4, 25A, and 320 in accordance with the test protocol submitted to MDEQ on July 31, 2013<sup>[1]</sup>. The emission tests were conducted from Monday, October 14 through Wednesday, October 16, 2013. This report summarizes the emissions test data, quality assurance data, test method procedures, sampling equipment calibrations, process operating conditions, and test program participants.

## **2. EMISSION TEST PROGRAM DESCRIPTION**

### **2.1 Amory, Mississippi Plant Description**

Enviva operates a plant producing wood pellets. The plant consists of a wood receiving yard, log debarkers and chippers, a rotary dryer, a hammermill, and an aspiration system serving the pellet presses and coolers. The plant processes wood composed of a range of hardwoods and softwoods.

### **2.2 Purpose and Scope of the Emission Test Program**

Based on a voluntary self-evaluation, Enviva reported to the Mississippi Department of Environmental Quality (MDEQ) that it may have underreported emissions of volatile organic compounds (VOCs) in its permit application. Enviva's concern was based on a set of engineering-oriented tests<sup>[2]</sup> conducted in November 2012 that indicated that VOC emissions from a hammermill source and a press cooler aspiration vent may be higher than previously known. While emissions from specific wood pellet plants are highly dependent on the specific equipment employed and, to a lesser degree, the hardwood/softwood mix of raw material, Enviva's preliminary findings in the November 2012 engineering test are generally consistent with other recent findings in the Wood Pellet Industry, specifically the engineering-oriented tests<sup>[3]</sup> at a Georgia Biomass, Inc. plant in Waycross, Georgia and Green Circle Bio Energy in Cottondale, Florida.

This air emission testing program is intended to address Enviva's concern and fulfills the requirements of the Order. Specifically, Enviva agreed to generate VOC emissions data for the following sources.

- Dryer stack
- Dry Hammermill stack
- Green Hammermill stack
- Pellet Mill and Cooler Aspiration System

### **2.3 Test Participants**

The Enviva project manager for this project was Mr. Michael Doniger, Director of Plant Operations. He was assisted by Mr. Joe Harrell, Environmental Manager, Mr. Mike Jones, and Mr. John Burns, Amory Plant Manager.

Mr. Michael J. Doniger, Director, Plant Operations  
Enviva LP  
7200 Wisconsin Avenue, Suite 1000  
Bethesda, Maryland 20814  
Phone: (301) 657 5560 Extension 163  
Email: Michael.Doniger@envivabiomass.com

Mr. Joe Harrell, Environmental Manager  
Enviva LP  
142 NC Route 561 East  
Ahoskie, NC 27910 USA  
Phone (252) 209-6032, Extension 202  
Email: Joe.Harrell@envivabiomass.com

Mr. John Burns, Plant Manager  
Enviva Pellets Amory, LLC  
Amory, MS  
Email: John.Burns@envivabiomass.com

Legal counsel for Enviva is Mr. Alan McConnell. Mr. McConnell participated in this study to ensure that it addressed the requirements of the Order.

Alan McConnell  
Kilpatrick Townsend & Stockton, LLP  
Suite 1400, 4208 Six Forks Road  
Raleigh, North Carolina 27609  
Phone (919) 420-1798  
Email: amcconnell@kilpatricktownsend.com

Enviva retained Air Control Techniques, P.C. to conduct the air emission testing program at the Amory plant. The Air Control Techniques, P.C. project manager was John Richards, Ph.D., P.E., QSTI. He was assisted by David Goshaw, P.E., QSTI, Todd Brozell, P.E., QSTI, and Jonas Gilbert. Tom Holder, QSTI provided quality assurance services for the test program. Contact information for Air Control Techniques, P.C. includes the following.

Air Control Techniques, P.C.  
301 East Durham Road  
Durham, N.C. 27513  
Phone: (919) 460-7811  
John Richards (john.richards@aircontroltechniques.com)  
David Goshaw (dave.goshaw@aircontroltechniques.com)  
Todd Brozell (todd.brozell@aircontroltechniques.com)  
Jonas Gilbert (jonas.gilbert@aircontroltechniques.com)  
Tom Holder (tom.holder@aircontroltechniques.com)

Enthalpy, Inc. provided Method 320 consulting support. The Enthalpy project manager for this project was Mr. Bryan Tyler. He was assisted by Dr. Grant Plummer, Mr. Clint Thrasher, and Mr. Steve Eckert, President.

Enthalpy Analytical, Inc.  
800 Capitola Drive  
Durham, North Carolina 27713  
Phone: (919) 850-4392, Extension 250  
Email: Bryan.tyler@enthalpyanalytical.com

### 3. TEST MATRIX AND TEST RESULTS

#### 3.1 Test Matrix

Table 3-1 summarizes the test program analytes, sampling methods, and analytical methods used for the four sources listed in Section 1.1.

| Table 3-1. Test Matrix, Air Emission Testing<br>Enviva Pellets, Amory, Mississippi |                |                   |               |                   |
|------------------------------------------------------------------------------------|----------------|-------------------|---------------|-------------------|
| Analyte                                                                            | Test Method    | Number of<br>Runs | Run<br>Length | Analytical Method |
| Acetaldehyde, Acrolein,<br>Formaldehyde, Methanol,<br>Phenol, Propionaldehyde      | EPA Method 320 | 3                 | 60 min        | FTIR              |
| Gas Flow                                                                           | EPA Method 2   | 3                 | 60 min        | Manometer         |
| Gas Molecular Weight,<br>Oxygen, Carbon Dioxide                                    | EPA Method 3   | 3                 | 60 min        | Fyrite® Analyzer  |
| Gas Moisture                                                                       | EPA Method 4   | 3                 | 60 min        | Gravimetric       |
| Total Hydrocarbons (THC)                                                           | EPA Method 25A | 3                 | 60 min        | FID               |

The tests were conducted on Monday, October 14 through Wednesday October 16, 2013.

#### 3.2 Test Results

The VOC and organic HAP test results and calculated annual emission rates are summarized in Tables 3-2 through 3-5. VOC and HAP emissions were measured simultaneously at each of the four emission units tested.

The VOC emissions have been calculated based on the total hydrocarbon data provided by Method 25A. The Method 25A data have been converted from a wet to a dry basis to account for the moisture in the stack gas stream. Total hydrocarbon concentrations (THC) have been used as a surrogate for VOCs.

The VOC emission calculations do not include any corrections for methane, ethane, or acetone despite the fact that these compounds are detected by Method 25A but are not classified as VOCs. Accordingly, the reported VOC emissions are biased to higher-than-true levels to the extent that these three compounds affected the Method 25A results.

The Method 25A data reflect the combined THC concentrations consisting of (1) alpha and beta pinene, (2) numerous other terpenes such as limonene and 3-carene, and (3) the organic HAPs. The organic HAP emissions discussed later in this report are also classified as VOCs and represent a small fraction of the total VOC emissions reported.

Method 320 was used to measure six organic compounds. Several of the organic compounds were below the detection limits of Method 320 in this matrix of gaseous constituents. These non-detection concentrations are designated by shading in Tables 3-2 through 3-5.

| Table 3-2. Dryer <sup>1</sup> Emission Test Results |            |            |            |         |
|-----------------------------------------------------|------------|------------|------------|---------|
| Parameter                                           | Run 1      | Run 2      | Run 3      | Average |
| Date                                                | 10/14/2013 | 10/14/2013 | 10/14/2013 | N/A     |
| Start                                               | 15:15      | 16:49      | 17:58      | N/A     |
| Stop                                                | 16:15      | 17:49      | 19:02      | N/A     |
| Throughput, tons/hour                               | 12.8       | 12.8       | 12.8       | 12.8    |
| Moisture Content Outlet, %wt.                       | 8.5        | 11.6       | 13.2       | 11.1    |
| Throughput, ODT/hour                                | 11.71      | 11.32      | 11.11      | 11.4    |
| ACFM                                                | 70,382     | 69,968     | 68,852     | 69,734  |
| DSCFM                                               | 49,036     | 49,728     | 48,642     | 49,135  |
| Stack Temperature, °F                               | 199.6      | 189.6      | 187.8      | 192.3   |
| O <sub>2</sub> , %                                  | 19         | 19.5       | 19         | 19.2    |
| % Moisture                                          | 12.05      | 11.64      | 12.06      | 11.9    |
| VOC, ppmvd as Propane                               | 33.6       | 24.8       | 25.2       | 27.9    |
| VOC, ppmvd as C1                                    | 100.8      | 74.4       | 75.6       | 83.6    |
| VOC, lbs/hour as C1                                 | 9.2        | 6.9        | 6.9        | 7.7     |
| VOC, lbs/ODT                                        | 0.79       | 0.61       | 0.62       | 0.7     |
| Methanol, ppmvd                                     | 3.61       | 1.83       | 2.43       | 2.62    |
| Acetaldehyde, ppmvd                                 | 0.99       | 0.98       | 0.99       | 0.98    |
| Acrolein, ppmvd                                     | 3.05       | 3.03       | 3.05       | 3.04    |
| Formaldehyde, ppmvd                                 | 0.82       | 0.57       | 0.74       | 0.71    |
| Phenol, ppmvd                                       | 4.15       | 4.13       | 4.15       | 4.14    |
| Propionaldehyde, ppmvd                              | 0.63       | 0.63       | 0.63       | 0.63    |
| Methanol, lbs/hour                                  | 0.88       | 0.45       | 0.59       | 0.64    |
| Acetaldehyde, lbs/hour                              | 0.00       | 0.00       | 0.00       | 0.00    |
| Acrolein, lbs/hour                                  | 0.00       | 0.00       | 0.00       | 0.00    |
| Formaldehyde, lbs/hour                              | 0.19       | 0.13       | 0.17       | 0.16    |
| Phenol, lbs/hour                                    | 0.00       | 0.00       | 0.00       | 0.00    |
| Propionaldehyde, lbs/hour                           | 0.00       | 0.00       | 0.00       | 0.00    |
| Methanol, lbs/ODT                                   | 0.075      | 0.040      | 0.053      | 0.056   |
| Acetaldehyde, lbs/ODT                               | 0.000      | 0.000      | 0.000      | 0.000   |
| Acrolein, lbs/ODT                                   | 0.000      | 0.000      | 0.000      | 0.000   |
| Formaldehyde, lbs/ODT                               | 0.016      | 0.012      | 0.015      | 0.014   |
| Phenol, lbs/ODT                                     | 0.000      | 0.000      | 0.000      | 0.000   |
| Propionaldehyde, lbs/ODT                            | 0.000      | 0.000      | 0.000      | 0.000   |

1. Note: Shaded area indicates a calculated minimum detection limit. Emissions were calculated based on zero for non-detect values.

| Table 3-3. Green Hammermill <sup>1</sup> Emission Test Results |            |            |            |         |
|----------------------------------------------------------------|------------|------------|------------|---------|
| Parameter                                                      | Run 1      | Run 2      | Run 3      | Average |
| Date                                                           | 10/15/2013 | 10/15/2013 | 10/15/2013 | N/A     |
| Start                                                          | 9:11       | 10:22      | 11:40      | N/A     |
| Stop                                                           | 10:11      | 11:22      | 12:40      | N/A     |
| Throughput, tons/hour                                          | 9.9        | 9.9        | 9.9        | 9.9     |
| Moisture Content Outlet, %wt.                                  | 48         | 48         | 48         | 48.0    |
| Throughput, ODT/hour                                           | 5.148      | 5.148      | 5.148      | 5.1     |
| ACFM                                                           | 12,277     | 12,367     | 12,326     | 12,323  |
| DSCFM                                                          | 11,630     | 11,634     | 11,490     | 11,585  |
| Stack Temperature, °F                                          | 87.4       | 87.5       | 88.4       | 87.8    |
| O <sub>2</sub> , %                                             | 20.9       | 20.9       | 20.9       | 20.9    |
| % Moisture                                                     | 2.25       | 2.92       | 3.64       | 2.94    |
| VOC, ppmvd as Propane                                          | 17.9       | 21.8       | 28.2       | 22.6    |
| VOC, ppmvd as C1                                               | 53.6       | 65.5       | 84.7       | 67.9    |
| VOC, lbs/hour as C1                                            | 1.16       | 1.42       | 1.82       | 1.47    |
| VOC, lbs/ODT                                                   | 0.23       | 0.28       | 0.35       | 0.29    |
| Methanol, ppmvd                                                | 2.68       | 2.77       | 2.79       | 2.74    |
| Acetaldehyde, ppmvd                                            | 0.89       | 0.89       | 0.90       | 0.00    |
| Acrolein, ppmvd                                                | 2.74       | 2.76       | 2.78       | 0.00    |
| Formaldehyde, ppmvd                                            | 0.21       | 0.21       | 0.21       | 0.00    |
| Phenol, ppmvd                                                  | 3.73       | 3.76       | 3.79       | 0.00    |
| Propionaldehyde, ppmvd                                         | 0.57       | 0.57       | 0.58       | 0.00    |
| Methanol, lbs/hour                                             | 0.16       | 0.16       | 0.16       | 0.159   |
| Acetaldehyde, lbs/hour                                         | 0.00       | 0.00       | 0.00       | 0.00    |
| Acrolein, lbs/hour                                             | 0.00       | 0.00       | 0.00       | 0.00    |
| Formaldehyde, lbs/hour                                         | 0.00       | 0.00       | 0.00       | 0.00    |
| Phenol, lbs/hour                                               | 0.00       | 0.00       | 0.00       | 0.00    |
| Propionaldehyde, lbs/hour                                      | 0.00       | 0.00       | 0.00       | 0.00    |
| Methanol, lbs/ODT                                              | 0.030      | 0.031      | 0.031      | 0.031   |
| Acetaldehyde, lbs/ODT                                          | 0.000      | 0.000      | 0.000      | 0.000   |
| Acrolein, lbs/ODT                                              | 0.000      | 0.000      | 0.000      | 0.000   |
| Formaldehyde, lbs/ODT                                          | 0.000      | 0.000      | 0.000      | 0.000   |
| Phenol, lbs/ODT                                                | 0.000      | 0.000      | 0.000      | 0.000   |
| Propionaldehyde, lbs/ODT                                       | 0.000      | 0.000      | 0.000      | 0.000   |

1. Note: Shaded area indicates a calculated minimum detection limit. Emissions were calculated based on zero for non-detect values.



| Table 3-4. Aspiration System <sup>1</sup> Emission Test Results |            |            |            |          |
|-----------------------------------------------------------------|------------|------------|------------|----------|
| Parameter                                                       | Run 1      | Run 2      | Run 3      | Average  |
| Date                                                            | 10/15/2013 | 10/15/2013 | 10/15/2013 | N/A      |
| Start                                                           | 17:36      | 18:49      | 20:00      | N/A      |
| Stop                                                            | 18:36      | 19:49      | 21:00      | N/A      |
| Throughput, tons/hour                                           | 16         | 16         | 16         | 16.0     |
| Moisture Content Outlet, %wt.                                   | 9.1        | 9.1        | 9.1        | 9.1      |
| Throughput, ODT/hour                                            | 14.54      | 14.54      | 14.54      | 14.5     |
| ACFM                                                            | 14,422     | 14,387     | 14,397     | 14,402.0 |
| DSCFM                                                           | 11,294     | 11,235     | 11,210     | 11,246   |
| Stack Temperature, °F                                           | 138.9      | 138.3      | 138.6      | 138.6    |
| O <sub>2</sub> , %                                              | 20.9       | 20.9       | 20.9       | 20.9     |
| % Moisture                                                      | 7.73       | 8.08       | 8.32       | 8.0      |
| VOC, ppmvd as Propane                                           | 376.9      | 413.8      | 303.6      | 364.8    |
| VOC, ppmvd as C1                                                | 1130.7     | 1241.4     | 910.8      | 1,094.3  |
| VOC, lbs/hour as C1                                             | 23.9       | 26.1       | 19.1       | 23.0     |
| VOC, lbs/ODT                                                    | 1.64       | 1.79       | 1.31       | 1.6      |
| Methanol, ppmvd                                                 | 2.83       | 3.11       | 2.94       | 2.96     |
| Acetaldehyde, ppmvd                                             | 0.94       | 0.94       | 0.95       | 0.94     |
| Acrolein, ppmvd                                                 | 2.90       | 2.91       | 2.92       | 2.91     |
| Formaldehyde, ppmvd                                             | 0.91       | 0.89       | 0.87       | 0.89     |
| Phenol, ppmvd                                                   | 3.95       | 3.97       | 3.98       | 3.97     |
| Propionaldehyde, ppmvd                                          | 0.60       | 0.61       | 0.61       | 0.61     |
| Methanol, lbs/hour                                              | 0.16       | 0.17       | 0.16       | 0.17     |
| Acetaldehyde, lbs/hour                                          | 0.00       | 0.00       | 0.00       | 0.00     |
| Acrolein, lbs/hour                                              | 0.00       | 0.00       | 0.00       | 0.00     |
| Formaldehyde, lbs/hour                                          | 0.05       | 0.05       | 0.05       | 0.05     |
| Phenol, lbs/hour                                                | 0.00       | 0.00       | 0.00       | 0.00     |
| Propionaldehyde, lbs/hour                                       | 0.00       | 0.00       | 0.00       | 0.00     |
| Methanol, lbs/ODT                                               | 0.011      | 0.012      | 0.011      | 0.011    |
| Acetaldehyde, lbs/ODT                                           | 0.000      | 0.000      | 0.000      | 0.000    |
| Acrolein, lbs/ODT                                               | 0.000      | 0.000      | 0.000      | 0.000    |
| Formaldehyde, lbs/ODT                                           | 0.003      | 0.003      | 0.003      | 0.003    |
| Phenol, lbs/ODT                                                 | 0.000      | 0.000      | 0.000      | 0.000    |
| Propionaldehyde, lbs/ODT                                        | 0.000      | 0.000      | 0.000      | 0.000    |

1. Note: Shaded area indicates a calculated minimum detection limit. Emissions were calculated based on zero for non-detect values.

Four test runs were conducted on the dry hammermill. During the first run conducted on October 15, 2013, problems relating to either stones entering the hammermill or problems with the hammers were causing the system to malfunction. The unit was inspected overnight and found in good condition. Three additional runs were conducted on October 16, 2013. All four runs were included in the test averages.

| Table 3-5. Dry Hammermill <sup>1</sup> Emission Test Results |            |            |            |            |          |
|--------------------------------------------------------------|------------|------------|------------|------------|----------|
| Parameter                                                    | Run 1      | Run 2      | Run 3      | Run 4      | Average  |
| Date                                                         | 10/15/2013 | 10/16/2013 | 10/16/2013 | 10/16/2013 | N/A      |
| Start                                                        | 13:48      | 10:54      | 12:07      | 13:21      | N/A      |
| Stop                                                         | 14:48      | 11:54      | 13:07      | 14:21      | N/A      |
| Throughput, tons/hour                                        | 17.6       | 16.1       | 16.1       | 16.1       | 16.5     |
| Moisture Content Outlet, %wt.                                | 10         | 10         | 10         | 10         | 10.0     |
| Throughput, ODT/hour                                         | 15.84      | 14.49      | 14.49      | 14.49      | 14.8     |
| ACFM                                                         | 19,757     | 18,980     | 19,427     | 19,321     | 19,371.3 |
| DSCFM                                                        | 17,849     | 17,591     | 17,745     | 17,421     | 17,652   |
| Stack Temperature, °F                                        | 100.8      | 88.6       | 93.8       | 96.1       | 94.8     |
| O <sub>2</sub> , %                                           | 20.9       | 20.9       | 20.9       | 20.9       | 20.9     |
| % Moisture                                                   | 3.57       | 2.89       | 3.4        | 4.25       | 3.5      |
| VOC, ppmvd as Propane                                        | 122.3      | 82.7       | 88.6       | 91.5       | 96.3     |
| VOC, ppmvd as C1                                             | 366.9      | 248.1      | 265.8      | 274.5      | 288.8    |
| VOC, lbs/hour as C1                                          | 12.2       | 8.2        | 8.8        | 8.9        | 9.5      |
| VOC, lbs/ODT                                                 | 0.77       | 0.57       | 0.61       | 0.61       | 0.6      |
| Methanol, ppmvd                                              | 1.04       | 0.71       | 0.83       | 0.9        | 0.87     |
| Acetaldehyde, ppmvd                                          | 0.90       | 0.89       | 0.90       | 0.75       | 0.86     |
| Acrolein, ppmvd                                              | 2.83       | 2.76       | 2.77       | 2.80       | 2.80     |
| Formaldehyde, ppmvd                                          | 0.21       | 0.21       | 0.21       | 0.14       | 0.19     |
| Phenol, ppmvd                                                | 3.78       | 3.76       | 3.78       | 0.42       | 2.93     |
| Propionaldehyde, ppmvd                                       | 0.58       | 0.57       | 0.58       | 0.24       | 0.49     |
| Methanol, lbs/hour                                           | 0.06       | 0.04       | 0.05       | 0.06       | 0.05     |
| Acetaldehyde, lbs/hour                                       | 0          | 0          | 0          | 0          | 0.00     |
| Acrolein, lbs/hour                                           | 0          | 0          | 0          | 0          | 0        |
| Formaldehyde, lbs/hour                                       | 0          | 0          | 0          | 0          | 0.00     |
| Phenol, lbs/hour                                             | 0          | 0          | 0          | 0          | 0.00     |
| Propionaldehyde, lbs/hour                                    | 0          | 0          | 0          | 0          | 0.00     |
| Methanol, lbs/ODT                                            | 0.004      | 0.003      | 0.003      | 0.004      | 0.004    |
| Acetaldehyde, lbs/ODT                                        | 0.000      | 0.000      | 0.000      | 0.000      | 0.000    |
| Acrolein, lbs/ODT                                            | 0.004      | 0.004      | 0.004      | 0.004      | 0.004    |
| Formaldehyde, lbs/ODT                                        | 0.000      | 0.000      | 0.000      | 0.000      | 0.000    |
| Phenol, lbs/ODT                                              | 0.000      | 0.000      | 0.000      | 0.000      | 0.000    |
| Propionaldehyde, lbs/ODT                                     | 0.000      | 0.000      | 0.000      | 0.000      | 0.000    |

1. Note: Shaded area indicates a calculated minimum detection limit. Emissions were calculated based on zero for non-detect values.

### 3.3 Emissions Data Evaluation

#### Method 25A VOC Concentrations

The VOC emissions from the various process units ranged from 0.03 to 1.6 pounds per ODT. VOC emissions expressed on a pounds per ODT basis were highest from the aspiration system.

The data summarized in Tables 3-2 through 3-5 indicate that the total VOC emissions from the Amory Plant exceed 100 tons per year calculated as carbon. These tests confirm that the plant is a Title V major source for VOCs.

The accuracy of the VOC data is demonstrated by a Method 25A response factor of approximately 1 for the group of compounds present in the gas stream. The Method 25A response is expressed in terms of a response factor that is defined as the observed Method 25A concentration divided by the true concentration. The Method 25A FID has a response factor close to 1.0 for a large set of organic compounds. Some high molecular weight organics have a response factor larger than 1, and in some cases, approaching 1.5. For these compounds, Method 25A is biased to higher-than-true concentrations. Some low molecular weight-highly oxygenated organic compounds such as methanol and formaldehyde have very low response factors in the range of 0.1 to 0.4. For these compounds, Method 25A is biased to lower-than-true concentrations.

As part of the laboratory tests reported to MDEQ in Enviva's Phase I emission study dated July 31, 2013<sup>[4]</sup> (the "Phase I Study"), Air Control Techniques, P.C. has taken the following two independent approaches in assessing the Method 25A response factors: (1) direct measurement of the Method 25A response factor using an alpha-pinene gas standard, the dominant organic compound measured during the laboratory tests and (2) a comparison of the Method 25A concentration data with the summed concentrations of all of the specific organics measured simultaneously using NCASI Method 98.01 and EPA Method 18. The results of these response factor analyses are presented in Tables 3-6 and 3-7.

| Table 3-6. Alpha-Pinene Method 25A Response Factor <sup>1</sup> |         |
|-----------------------------------------------------------------|---------|
| Alpha-Pinene Gas Standard, as C <sub>10</sub> H <sub>16</sub>   | 259 ppm |
| Alpha-Pinene Gas Standard, as C <sub>3</sub>                    | 863 ppm |
| FID Response, as C <sub>3</sub>                                 | 888 ppm |
| Response Factor as C <sub>3</sub>                               | 1.03    |

1. Note: This table was included in the Phase I Study report to MDEQ.

| Table 3-7. Calculated Method 25A Response Factors in Phase I Laboratory Tests <sup>1</sup> |              |                     |                                                      |                               |                           |
|--------------------------------------------------------------------------------------------|--------------|---------------------|------------------------------------------------------|-------------------------------|---------------------------|
| Run                                                                                        | Process Type | Softwood Content, % | Method 25A versus Combined NCASI 98.01 and Method 18 | Dominant Compounds            | Other Important Compounds |
| 4                                                                                          | Dryer        | 10                  | 0.72                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone, Methanol         |
| 5                                                                                          | Dryer        | 10                  | 0.70                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone, Methanol         |
| 6                                                                                          | Dryer        | 10                  | 0.75                                                 | $\alpha$ -and $\beta$ -Pinene | Methanol, Formaldehyde    |
| 21                                                                                         | Dryer        | 10                  | 1.23                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone, Methanol         |
| 22                                                                                         | Press        | 10                  | 1.05                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone, Methanol         |
| 7                                                                                          | Dryer        | 70                  | 0.85                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone                   |
| 8                                                                                          | Dryer        | 70                  | 0.90                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone                   |
| 9                                                                                          | Dryer        | 70                  | 1.02                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone                   |
| 10                                                                                         | Dryer        | 70                  | 0.91                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone                   |
| 24                                                                                         | Press        | 70                  | 1.51                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone, Methanol         |
| 11                                                                                         | Dryer        | 100                 | 0.99                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone                   |
| 12                                                                                         | Dryer        | 100                 | 0.96                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone                   |
| 13                                                                                         | Dryer        | 100                 | 0.85                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone                   |
| 14                                                                                         | Dryer        | 100                 | 0.87                                                 | $\alpha$ -and $\beta$ -Pinene | Acetone                   |
| 16                                                                                         | Dryer        | 100                 | 1.09                                                 | $\alpha$ -and $\beta$ -Pinene | Methanol, Acetone         |
| 19                                                                                         | Dryer        | 100                 | 1.21                                                 | $\alpha$ -and $\beta$ -Pinene | Methanol, Acetone         |
| 20                                                                                         | Press        | 100                 | 1.13                                                 | $\alpha$ -and $\beta$ -Pinene | Methanol, Acetone         |
| Test Program Average                                                                       |              |                     | 0.98                                                 |                               |                           |

1. Note: This table was included in the Phase I Study report to MDEQ.

The excellent agreement between the Method 25A total concentration and the combined concentrations of all of the organics measured by NCASI 98.01 and EPA Method 18 demonstrate that Method 25A is an appropriate VOC measurement technique for wood pellet production facilities.

### Method 320 HAP Concentrations

At the maximum permitted production limit of 99,000 ODT per year for the dryer/GHM, and maximum potential operations of 8,760 hours for the DHM/aspiration sources, all six of the organic HAPs are each emitted at less than 10 tons per year. The total HAP emissions for the plant are less than 25 tons per year.

The list of HAPs specifically included in the test protocol included methanol, acetaldehyde, acrolein, formaldehyde, phenol, and propionaldehyde. This list was compiled based on (1) the organic compounds identified in laboratory analyses of pellet production facilities emissions, (2) previous emission tests conducted in the Pellet Manufacturing Industry, and (3) organic HAPs identified in studies of other wood products industries—specifically, MDF production.

The results of this test program indicate that this list of HAPs compounds needs to be amended. Phenol was not detected in any of the tests of the four process units. Propionaldehyde was also not detected in any of the tests.

The non-detectable phenol emissions data are consistent with the results of the Phase I Study. Phenol was not identified at detectable concentrations in any of the laboratory studies summarized in the Phase I Study report. The emission rates of phenol reported in a November 2012 Wiggins report <sup>[2]</sup> ranged from 0.0002 to 0.0018 pounds per hour—all insignificant emission rates. Phenol was also not listed in previous emission tests reviewed in preparation for this test program. Phenol was included in the test protocol primarily because other researchers such as Beauchemin and Tampier, <sup>[5]</sup> Milot, <sup>[6]</sup> and Milot and Mosher <sup>[7]</sup> listed phenol due to its inclusion in tests conducted at MDF and particleboard facilities. However, phenol emissions in MDF and particleboard production are due to the use of phenolic resins and similar binders. There is no reason to expect any appreciable phenol formation in pellet production considering (1) the lack of binders of any type in pellet production, (2) the higher moisture levels in pellet production as compared to MDF and particleboard processes, and (3) the lower material temperatures in pellet process equipment. Air Control Techniques, P.C. has assigned zero values to non-detected concentrations.

Acetaldehyde, propionaldehyde, and acrolein had very low concentrations in most of the emission tests summarized in this report. The IR absorption spectra of both water and the terpene compounds overlap the absorption spectra of acetaldehyde, propionaldehyde, and acrolein. Accordingly, the reported concentrations of these three compounds are biased to higher-than-true levels to the extent that this interference could not be avoided by Method 320 spectral absorption modeling. Zero values have been assigned when these concentrations were below detection limits of Method 320 due, in part, to the interference bias.

The use of zero values for non-detected compounds is an appropriate approach for any source, such as pellet production, where there are a few dominant compounds (i.e. methanol and formaldehyde) and a large number of possible compounds at extremely low levels such as phenol, acetaldehyde, and propionaldehyde. The use of non-detect or one-half non-detect concentrations in emission calculations for a large number of compounds potentially present at trace levels inherently makes any source “major” regardless of the actual emissions, size, or operations characteristics of the emission unit.

### 3.4 VOC and Organic HAP Emission Summary

Table 3-8 summarizes annual emissions of VOC and organic HAP compounds. The annual emission rates are based on operation at the permit limited production rate of 99,000 ODT for the dryer/GHM, and maximum operations of 8,760 hours per year for the DHM/aspiration sources.

| Table 3-8. Total Emissions at Plant Permit Limit Of 99,000 Tons/Year for the Dryer and Green Hammermill and 8,760 hours for the Dry Hammermill and Aspirator |       |                |                  |           |       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|----------------|------------------|-----------|-------|
| Analyte                                                                                                                                                      | Dryer | Dry Hammermill | Green Hammermill | Aspirator | Total |
| Total VOC                                                                                                                                                    | 29.9  | 41.72          | 12.71            | 100.89    | 185.3 |
| Methanol                                                                                                                                                     | 2.50  | 0.34           | 1.37             | 0.73      | 4.94  |
| Acetaldehyde                                                                                                                                                 | 0.00  | 0.00           | 0.00             | 0.00      | 0.00  |
| Acrolein                                                                                                                                                     | 0.00  | 0.00           | 0.00             | 0.00      | 0.00  |
| Formaldehyde                                                                                                                                                 | 0.64  | 0.00           | 0.00             | 0.00      | 0.64  |
| Phenol                                                                                                                                                       | 0.00  | 0.00           | 0.00             | 0.00      | 0.00  |
| Propionaldehyde                                                                                                                                              | 0.00  | 0.00           | 0.00             | 0.00      | 0.00  |
| Total HAPS                                                                                                                                                   | 3.14  | 0.34           | 1.37             | 0.73      | 5.58  |



## 4. SAMPLING LOCATIONS

### 4.1 Dryer Stack Sampling Location

The dryer sampling location meets EPA Method 1 location requirements as indicated in Figure 4-1. Twelve sampling points were used to measure the gas flow rate.

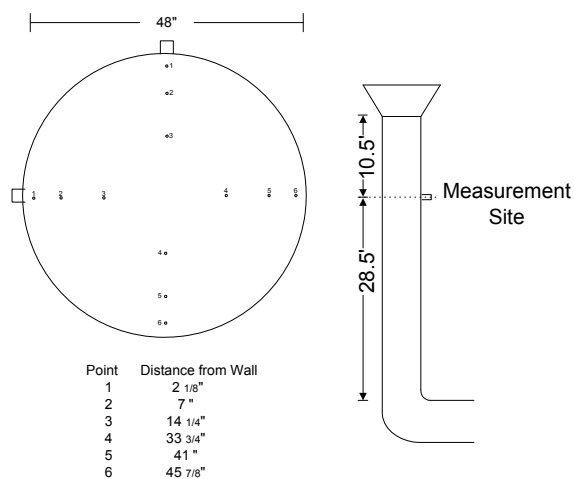


Figure 4-1 Dryer # 1 Stack Sampling Location

The downstream<sup>1</sup> flow disturbance is the stack discharge. The upstream flow disturbance is the duct from the fan entering the base of the stack.

During the sampling program, only the port facing south was used. The port facing east was blocked by the stack support cable.

No cyclonic flow conditions were observed in the Dryer stack. The point-by-point cyclonic flow checks indicated an average flow angle 1.9 degrees. This meets the requirements of Section 11.4 of Method 1. A photograph of the Dryer stack is shown in Figure 4-2.

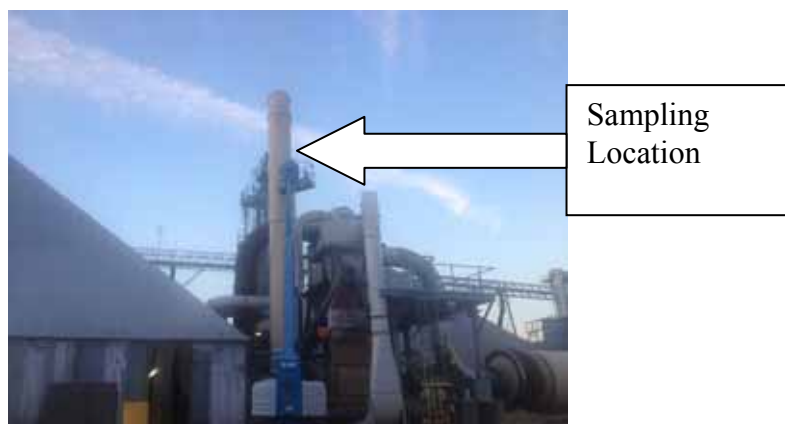


Figure 4-2. Photograph of the Dryer Stack

<sup>1</sup> "Upstream" and "downstream" are defined based on the sampling location as the reference point.

## 4.2 Dry Hammermill Stack Sampling Location

The Dry Hammermill sampling location meets EPA Method 1 location requirements as indicated in Figure 4-3. Twelve sampling points were used to measure the gas flow rate.

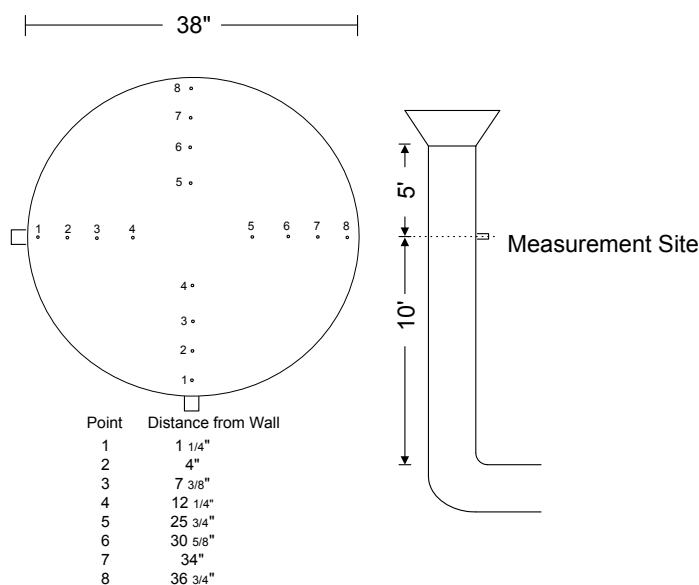


Figure 4-3. Dry Hammermill Sampling Location

The downstream flow disturbance is the stack discharge. The upstream flow disturbance is the fan discharge duct. During the sampling program, both ports were accessible.

No cyclonic flow conditions were observed in the Dry Hammermill stack. The point-by-point cyclonic flow checks indicated an average flow angle of 1.9 degrees. This meets the requirements of Section 11.4 of Method 1. A photograph of the Dry Hammermill stack is shown in Figure 4-4.



Figure 4-4. Photograph of the Dry Hammermill Sampling Location



### 4.3 Pellet Mill Aspiration System Sampling Location

The Aspiration System sampling location meets EPA Method 1 location requirements as indicated in Figure 4-5. Twelve sampling points were used to measure the gas flow rate.

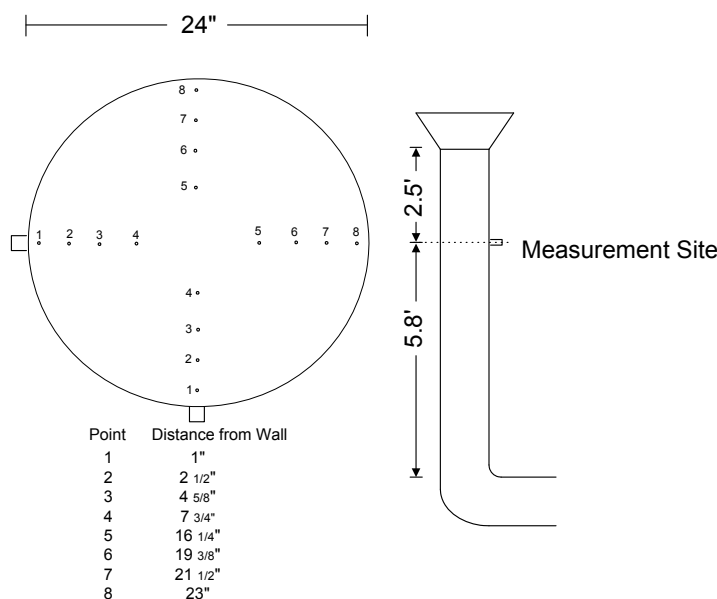


Figure 4-5. Pellet Mill Aspiration System Sampling Location

The upstream flow disturbance was an entry duct to the fan inlet. The downstream flow disturbance was an elbow from the multicyclone collector.

No cyclonic flow conditions were observed in the Aspiration System outlet duct. The point-by-point cyclonic flow checks indicated an average flow angle of 3.1 degrees. This meets the requirements of Section 11.4 of Method 1. A photograph of the Aspiration System sampling location is shown in Figure 4-6.

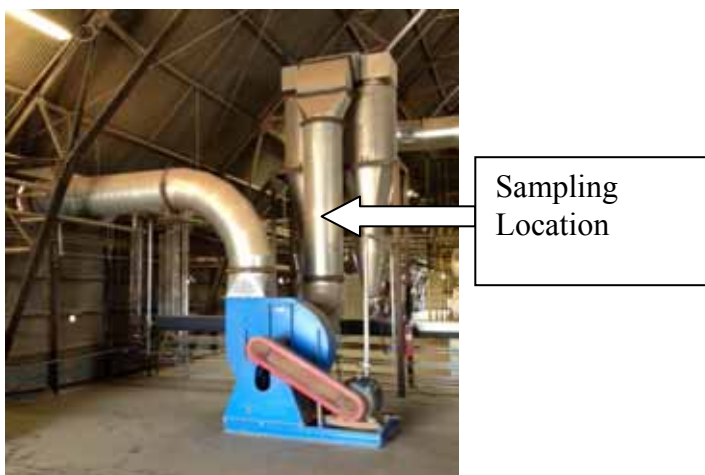


Figure 4-6. Photograph of the Pellet Mill Aspiration System Sampling Location

#### 4.4 Green Hammermill Stack Sampling Location

The Green Hammermill stack sampling location shown in Figure 4-7 meets the minimum requirements for a downstream flow disturbance specified in Method 1, Section 11.1. The downstream flow disturbance is the fan discharge duct. The upstream flow disturbance is the stack discharge. Both ports were accessible for sampling.

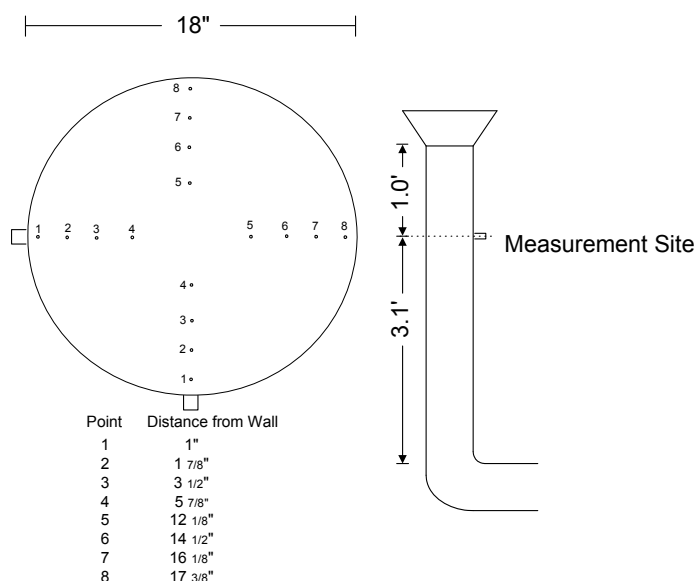


Figure 4-7. Green Hammermill Stack Sampling Location

No cyclonic flow conditions were observed in the Green Hammermill stack. The point-by-point cyclonic flow checks indicated an average flow angle of 2.6 degrees. This meets the requirements of Section 11.4 of Method 1. A photograph of the Green Hammermill stack is shown in Figure 4-8.

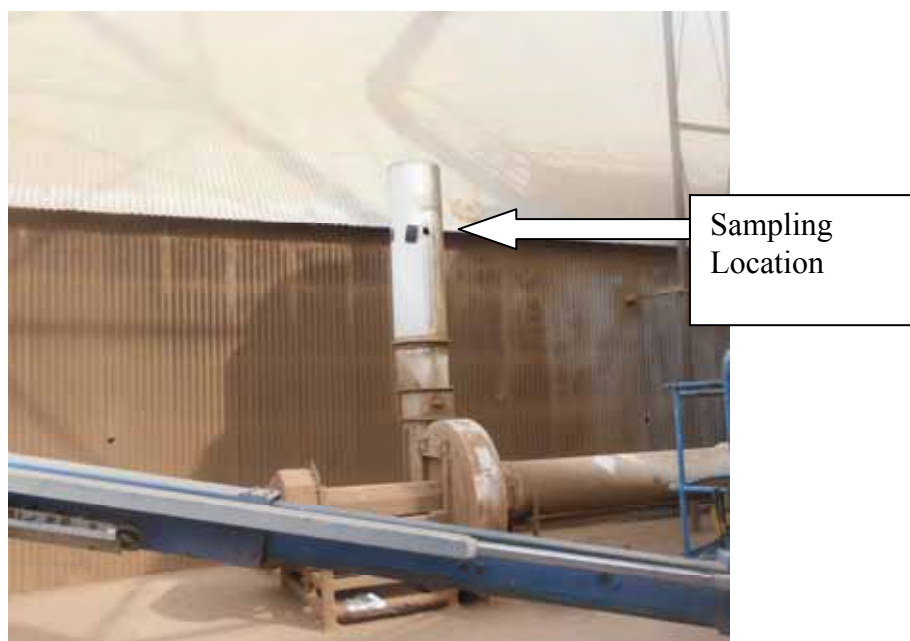


Figure 4-8. Green Hammermill Stack

## **5. TESTING PROCEDURES**

### **5.1 Flue Gas Velocity and Volumetric Flow Rate - EPA Method 2**

The flue gas velocities and volumetric flow rates during all of the emission tests were determined according to the procedures outlined in U.S. EPA Reference Method 2. Velocity measurements were made using S-Type Pitot tubes conforming to the geometric specifications outlined in Method 2. Accordingly, each Pitot was assigned a coefficient of 0.84. Velocity pressures were measured with fluid manometers. Effluent gas temperatures were measured with chromel-alumel thermocouples attached to digital readouts.

### **5.2 Flue Gas Composition and Molecular Weight - EPA Method 3**

Flue gas analyses and calculation of flue gas dry molecular weights were performed in accordance with EPA Method 3. A stainless steel probe was inserted into the gas stream to collect a representative sample of the flue gas during each test run. The samples were analyzed using a Fyrite gas analyzer. Moisture was removed from the sample gas by means of a knockout jar located prior to the sample pump.

### **5.3 Flue Gas Moisture Content - EPA Method 4**

The flue gas moisture content was determined in conjunction with each test run according to the sampling and analytical procedures outlined in EPA Method 4. Wet impinger sampling trains were used to withdraw and analyze the stack gas. The impingers were connected in series and contained water in the first two impingers followed by an empty impinger and then a silica gel impinger. The impingers were contained in an ice bath to assure condensation of the flue gas stream moisture. Any moisture that was not condensed in the impingers was captured in the silica gel; therefore, all moisture was weighed and entered into moisture content calculations.

### **5.4 Total Hydrocarbons – EPA Method 25A**

Continuous emissions monitoring was conducted for volatile organic compounds. The sampling and analytical procedures for VOCs were conducted in accordance with EPA 25A. The CEM system consisted of a sample acquisition system, the THC emission monitor, and a data acquisition system (DAS). A California Analytical Model 300 flame ionization detector was used for the Method 25A tests.

The sample acquisition system included an in-stack probe, a heated out-of-stack glass mat filter for particulate matter removal, a heat-traced Teflon® sample line, a Teflon® heated-head pump, a moisture removal system, and a gas manifold board. All components of the sample acquisition system that contacted the sampled gas were constructed of Type 316 stainless steel or Teflon®. The sample gas was continuously extracted from a central point within the duct at a constant rate ( $\pm 10\%$ ) for the duration of each test run. The wet, filtered gas was transported to a heated-head pump located at the CEM laboratory. The sample gas was sent directly to the VOC analyzer. Care was taken to ensure that the sample gas was greater than 220°F during transport from the stack to the VOC monitor. All pretest and posttest calibration procedures were performed as outlined in the applicable EPA Reference Methods.

Total organic hydrocarbon concentrations were measured on a wet basis using a California Analytical 300 FID continuous emission monitor. The THC concentrations were monitored on a propane (C<sub>3</sub>) basis using a flame ionization detector (FID). The FID was fueled by a gas mixture

consisting of 40% helium and 60% hydrogen to reduce the effect of oxygen synergism. The THC analyzer was calibrated with a set of four gas standards. Calibration tests were performed prior to and following each test run.

Outputs from the individual emission monitors were connected to a computerized data acquisition system. Outputs from the analyzer were sent to a portable computer via a National Instruments<sup>TM</sup> FieldPoint controller. The signals were downloaded to a STRATA<sup>®</sup> software program every two seconds. The two-second readings were averaged for the duration of the test run.

Total mass emissions of VOCs were determined based on the Method 25A total hydrocarbon concentration data. The mass emissions were expressed on a pounds mass of carbon per hour.

### 5.5 Organic HAP Compounds – EPA Method 320

Testing for wet-basis organic HAP concentrations was conducted by extractive Fourier transform infrared (FTIR) spectroscopy using EPA Method 320 (40CFR, Part 63, Appendix A). Sample gas was continuously passed through the sampling system, which included an in-stack probe, a heated out-of-stack glass mat filter for particulate matter removal, a Teflon<sup>®</sup> heat-traced sample line, a MIDAC Fourier Transform Infrared (FTIR) spectrometer, a Teflon<sup>®</sup> heated-head pump, and a gas manifold board as shown in Figure 5-1. All components of the sample acquisition system that contacted the sampled gas were Type 316 stainless steel or Teflon<sup>®</sup>. All components of the sampling system and the FTIR cell were maintained at or above 120° C. Air Control Techniques, P.C. took great care to ensure that the sampling system contained no “cold spots” to prevent organic HAP loss. The sampling rate was maintained at greater than 10 liters per minute.

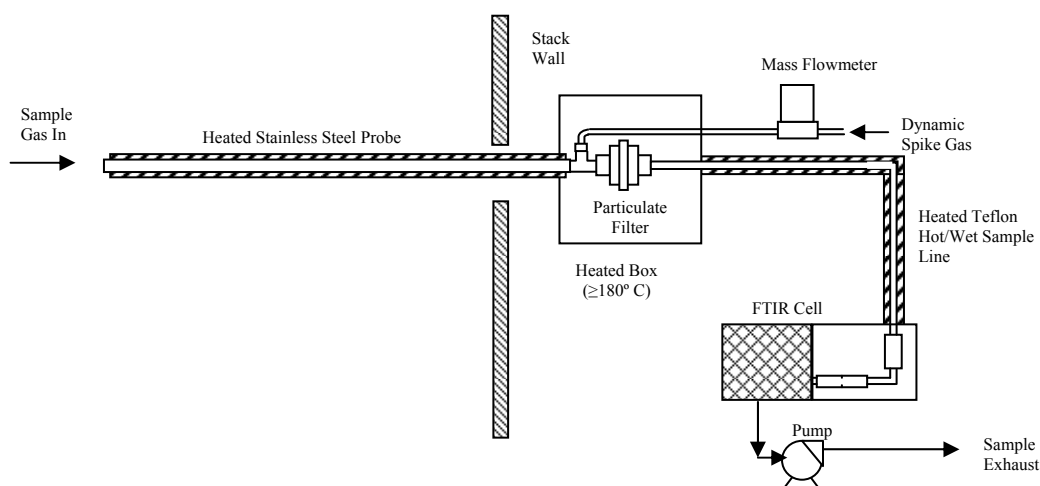


Figure 5-1. Method 320 Organic HAP Sampling System

The FTIR system included a MIDAC Corporation I-1301 spectrometer equipped with a heated, nominal 10-meter path absorption cell, a potassium bromide (KBr) beam splitter, zinc selenide (ZnSe) non-hygroscopic windows, and a liquid nitrogen-cooled Mercury Cadmium Telluride detector. Measurements were made using a MIDAC Model I-1301 high resolution Michelson interferometer with AutoQuant Pro software. Sample gas continuously passed through the sampling system, and sample spectra (based on 50 co-added interferograms) were recorded every

minute. The system's nominal spectral resolution was  $0.5\text{ cm}^{-1}$ . Samples and standards were analyzed at temperatures greater than  $120^{\circ}\text{C}$  and near ambient pressures.

The inside walls of the cells were polished stainless steel to minimize interaction of the sample with the cell walls, and the cell mirrors were of bare gold. The gas pressure in the FTIR sample cell was monitored with a pressure transducer connected directly to the sample cell. The heated sample cell was wrapped in an insulating thermal jacket, and the temperature was controlled with type J thermocouples. The absorption cell volume was approximately 2 liters.

The FTIR system was operated via a portable computer, and a data archive storage system (USB Mass Storage Drive) was used for data backup. All interferograms, single beams, absorbance spectra, and background single beams were stored and have been archived. The filename, time, pressure and temperature of the sample cell, scan rate, background identification and other pertinent information was recorded by hand during the test program.

Air Control Techniques used the program AutoquantPro<sup>TM</sup> Version 4.5.0.195, (©Midac Corporation, 2012) to collect and analyze all the infrared field data. The program allows the development and storage of analytical "methods" for analysis of spectral data (absorbance) files. The reference spectra used for these analyses were developed by MIDAC Corporation, EPA, and Enthalpy Analytical, Inc. One "model" was developed for determining the absorption path length and one additional "method" for determining the concentrations of the target compounds for each source.

The concentration uncertainty reported by AutoquantPro is called the Standard Error of the Estimated Concentration, or SEC; it is also known as the Marginal Standard Deviation. The uncertainties in the concentration are proportional to the square root of the sums of the squares of the residual. After the residual spectrum is obtained, which we will call R, the error variance for the case of a single reference spectrum is calculated as follows.

$$\sigma^2 = \frac{\sum_i R_i^2}{(n-1)}$$

Where n is the number of observations. The SEC is given by the following.

$$SEC = \frac{\sigma C}{\sqrt{\sum_i A_i^2}}$$

Where **A** is the spectrum and **C** is the known concentration of the reference.

The 95% confidence interval is 1.96 times the SEC.

## **6. QUALITY ASSURANCE**

### **6.1 Method 1 Quality Assurance**

All S-type Pitot tubes used in this project conformed to EPA guidelines concerning construction and geometry. Pitot tubes were inspected prior to use. Information pertaining to S-type Pitot tubes is presented in detail in Section 3.1.1 of EPA Publication No. 600/4-77-027b. Only S-type Pitot tubes meeting the required EPA specifications were used in this project.

The thermocouples used in this project were calibrated using the procedures described in Section 3.4.2 of EPA Publication No. 600/4-77-027b. Each temperature sensor was calibrated at a minimum of three points over the anticipated range of use against NIST-traceable mercury in glass thermometer.

### **6.2 Method 4 Quality Assurance**

Pretest and posttest leak checks were conducted on each Method 4 sampling train used. The observed leak rates for the sampling trains were below 0.02 actual cubic feet per minute as required by Method 4.

All dry gas meters were fully calibrated to determine the volume correction factor prior to field use. Post-tests calibration checks were performed as soon as possible after the equipment was returned to the laboratory. Pre-and post-test calibrations agreed within  $\pm 5$  percent. The calibration procedure is documented in Section 3.3.2 of EPA Publication No. 600/4-77-237b.

The scales used at the test location to determine flue gas moisture content were calibrated using a standard set of weights.

### **6.3 Method 25A Quality Assurance**

At the beginning of the test day, a linearity calibration test was performed on each analyzer. The continuous emission monitoring instrument response did not differ by more  $\pm 5$  from the propane calibration standard. Linearity results for the test program are provided in Table 6-1 through 6-8.

Prior to and following each test run, a system calibration test was performed. The system test was performed to verify that the sampling system did not contain leaks (system bias) and to measure a change in analyzer response during the test program (system drift). The system bias was less than  $\pm 5\%$  of full-scale, and system drift was less than  $\pm 3\%$  of full scale. System calibration results for the test program are provided in Tables 6-1 through 6-8.

| Table 6-1. Dryer Quality Assurance Results,<br>Total Hydrocarbons, Method 25A |           |             |       |       |
|-------------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                               |           |             |       |       |
| Parameter                                                                     | Allowable | Test Series |       |       |
| Zero, %                                                                       | ±5        | 0.1         |       |       |
| Low, %                                                                        | ±5        | 1.1         |       |       |
| Mid, %                                                                        | ±5        | 0.2         |       |       |
| High, %                                                                       | ±5        | 0.1         |       |       |
| System Tests                                                                  |           |             |       |       |
| Parameter                                                                     | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                            | ±5        | 0.0         | 0.1   | 0.2   |
| Zero Bias (Post), %                                                           | ±5        | 0.1         | 0.2   | 0.2   |
| Up-scale Bias (Pre), %                                                        | ±5        | 0.0         | 0.0   | 0.1   |
| Up-scale Bias (Post), %                                                       | ±5        | 0.0         | 0.1   | 0.1   |
| Zero Drift, %                                                                 | ±3        | 0.1         | 0.1   | 0.0   |
| Up-scale Drift, %                                                             | ±3        | 0.1         | 0.1   | 0.0   |
| Response Time, sec                                                            | N/A       | 30          |       |       |

| Table 6-2. Dry Hammermill Quality Assurance Results,<br>Total Hydrocarbons, Method 25A, Low Range |           |             |       |       |       |
|---------------------------------------------------------------------------------------------------|-----------|-------------|-------|-------|-------|
| Linearity Tests                                                                                   |           |             |       |       |       |
| Parameter                                                                                         | Allowable | Test Series |       |       |       |
| Zero, %                                                                                           | ±5        | 0.1         | 0.1   |       |       |
| Low, %                                                                                            | ±5        | 0.4         | 1.1   |       |       |
| Mid, %                                                                                            | ±5        | 0.5         | 1.0   |       |       |
| High, %                                                                                           | ±5        | 0.3         | 0.5   |       |       |
| System Tests                                                                                      |           |             |       |       |       |
| Parameter                                                                                         | Allowable | Run 1       | Run 2 | Run 3 | Run 4 |
| Zero Bias (Pre), %                                                                                | ±5        | 0           | 0     | -0.2  | 0.0   |
| Zero Bias (Post), %                                                                               | ±5        | 0.1         | -0.2  | 0.0   | 0.0   |
| Up-scale Bias (Pre), %                                                                            | ±5        | 0.0         | 0.0   | 0.3   | 0.2   |
| Up-scale Bias (Post), %                                                                           | ±5        | 0.3         | 0.3   | 0.2   | 0.1   |
| Zero Drift, %                                                                                     | ±3        | 0.1         | -0.2  | 0.2   | 0.0   |
| Up-scale Drift, %                                                                                 | ±3        | 0.3         | 0.3   | -0.1  | 0.0   |
| Response Time, sec                                                                                | N/A       | 30          |       |       |       |

| Table 6-3. Dry Hammermill Quality Assurance Results,<br>Total Hydrocarbons, Method 25A, High Range |           |             |       |       |       |
|----------------------------------------------------------------------------------------------------|-----------|-------------|-------|-------|-------|
| Linearity Tests                                                                                    |           |             |       |       |       |
| Parameter                                                                                          | Allowable | Test Series |       |       |       |
| Zero, %                                                                                            | ±5        | 0.0         | 0.0   |       |       |
| Low, %                                                                                             | ±5        | 0.2         | 0.3   |       |       |
| Mid, %                                                                                             | ±5        | 0.1         | 0.2   |       |       |
| High, %                                                                                            | ±5        | 0.0         | 0.0   |       |       |
| System Tests                                                                                       |           |             |       |       |       |
| Parameter                                                                                          | Allowable | Run 1       | Run 2 | Run 3 | Run 4 |
| Zero Bias (Pre), %                                                                                 | ±5        | 0.0         | 0.0   | 0.0   | 0.0   |
| Zero Bias (Post), %                                                                                | ±5        | 0.0         | 0.0   | 0.0   | 0.0   |
| Up-scale Bias (Pre), %                                                                             | ±5        | 0.0         | 0.0   | 0.1   | 0.0   |
| Up-scale Bias (Post), %                                                                            | ±5        | 0.0         | 0.1   | 0.0   | 0.0   |
| Zero Drift, %                                                                                      | ±3        | 0.0         | 0.0   | 0.0   | 0.0   |
| Up-scale Drift, %                                                                                  | ±3        | 0.0         | 0.1   | -0.1  | 0.0   |
| Response Time, sec                                                                                 | N/A       | 30          |       |       |       |

| Table 6-4. Aspiration System Quality Assurance Results,<br>Total Hydrocarbons, Method 25A |           |             |       |       |
|-------------------------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                                           |           |             |       |       |
| Parameter                                                                                 | Allowable | Test Series |       |       |
| Zero, %                                                                                   | ±5        | 0.0         |       |       |
| Low, %                                                                                    | ±5        | 0.3         |       |       |
| Mid, %                                                                                    | ±5        | -0.2        |       |       |
| High, %                                                                                   | ±5        | 0.0         |       |       |
| System Tests                                                                              |           |             |       |       |
| Parameter                                                                                 | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                                        | ±5        | 0.0         | 0.1   | 0.1   |
| Zero Bias (Post), %                                                                       | ±5        | 0.1         | 0.1   | 0.1   |
| Up-scale Bias (Pre), %                                                                    | ±5        | 0.0         | 0.1   | 0.2   |
| Up-scale Bias (Post), %                                                                   | ±5        | 0.1         | 0.2   | 0.2   |
| Zero Drift, %                                                                             | ±3        | 0.1         | 0.0   | 0.0   |
| Up-scale Drift, %                                                                         | ±3        | 0.1         | 0.0   | 0.0   |
| Response Time, sec                                                                        | N/A       | 30          |       |       |



| Table 6-5. Green Hammermill Quality Assurance Results,<br>Total Hydrocarbons, Method 25A |           |             |       |       |
|------------------------------------------------------------------------------------------|-----------|-------------|-------|-------|
| Linearity Tests                                                                          |           |             |       |       |
| Parameter                                                                                | Allowable | Test Series |       |       |
| Zero, %                                                                                  | ±8        | 0.1         |       |       |
| Low, %                                                                                   | ±8        | -1.2        |       |       |
| Mid, %                                                                                   | ±8        | 0.0         |       |       |
| High, %                                                                                  | ±8        | 0.1         |       |       |
| System Tests                                                                             |           |             |       |       |
| Parameter                                                                                | Allowable | Run 1       | Run 2 | Run 3 |
| Zero Bias (Pre), %                                                                       | ±5        | 0.0         | 0.0   | -0.2  |
| Zero Bias (Post), %                                                                      | ±5        | 0.0         | -0.2  | -0.1  |
| Up-scale Bias (Pre), %                                                                   | ±5        | 0.0         | 0.1   | 0.5   |
| Up-scale Bias (Post), %                                                                  | ±5        | 0.1         | 0.5   | 0.3   |
| Zero Drift, %                                                                            | ±3        | 0.0         | -0.2  | 0.1   |
| Up-scale Drift, %                                                                        | ±3        | 0.1         | 0.5   | -0.3  |
| Response Time, sec                                                                       | N/A       | 30          |       |       |

## 6.4 Method 320 Quality Assurance

Air Control Techniques, P.C. performed daily quality assurance checks. Background scans and calibration transfer standard (CTS) spectra tests were performed prior to and following each test series. An analyte spike was performed using methanol.

The flow rate at the outlet of the pump was measured while the probe was plugged to verify that the sampling system was leak free. The flow rate was less than 200 ml/min.

The FTIR cell was tested for leaks by closing the value while the cell was at minimum absolute pressure.

### Background Spectra

Sample spectra were divided point-by-point by a 128-scan background recorded using N<sub>2</sub>. The single beam spectrum was constantly monitored, and a new background was generated following each test series or when residual and absorbance spectra indicated component build-up on the optical surfaces or alignment-related baseline shifts.

### Calibration Transfer Standards and Absorption Path Lengths

A cylinder of 100 ppm ethylene in nitrogen served as the CTS. A CTS gas was introduced to the FTIR and allowed to reach steady state. The CTS was used to determine effective cell path length based on comparisons of the “field” CTS spectra to a laboratory CTS spectrum recorded by MIDAC. As shown in Table 6-6, the maximum path length deviation was less than 5% of the average.

| Table 6-6. CTS Results Summary |      |                          |              |                      |                   |                            |                           |
|--------------------------------|------|--------------------------|--------------|----------------------|-------------------|----------------------------|---------------------------|
| Date                           | Time | CTS Scan<br>(pathlength) | SEC<br>(ppm) | Cell Press.<br>(psi) | Cell Temp<br>(°C) | Deviation from<br>Previous | Deviation from<br>Average |
| 14-Oct                         | 1215 | 8.693                    | 0.133        | 14.75                | 121               | -0.2%                      | -0.2%                     |
|                                | 1923 | 8.685                    | 0.133        | 14.77                | 121               | -0.1%                      | -0.1%                     |
| 15-Oct                         | 750  | 8.659                    | 0.132        | 14.19                | 121               | 0.2%                       | 0.2%                      |
|                                | 1311 | 8.705                    | 0.134        | 14.62                | 121               | -0.4%                      | -0.4%                     |
|                                | 1627 | 8.739                    | 0.133        | 14.6                 | 121               | -0.7%                      | -0.7%                     |
|                                | 2115 | 8.673                    | 0.132        | 14.6                 | 121               | 0.0%                       | 0.0%                      |
| 16-Oct                         | 0830 | 8.614                    | 0.134        | 14.81                | 121               | 0.7%                       | 0.7%                      |
|                                | 1510 | 8.624                    | 0.132        | 14.77                | 121               | 0.6%                       | 0.6%                      |
| Average                        |      | 8.674                    | 0.133        | Maximum              |                   |                            | -0.7%                     |

### Background Spectra

On-site test personnel performed matrix spiking using a certified calibration standard of methanol and SF<sub>6</sub>. The methanol gas standard was introduced into the sampling system upstream of the particulate matter filter at an average dilution ratio of less than 10% of the total sample volume. Analyte spiking was performed to demonstrate the suitability of the sampling system. The dilution factor was calculated based on the ratio of the SF<sub>6</sub> tracer gas analyzed directly by the FTIR and the in-stack measured concentration.

$$\frac{SF_6 \text{ during spike}}{SF_6 \text{ direct}} = DF$$

The recovery was calculated using the mean concentration of the spiked analyte (S<sub>m</sub>), the native concentration of the analyte in the stack (S<sub>u</sub>), the dilution factor (DF), and the cylinder concentration (C<sub>s</sub>).

$$\text{Recovery(\%)} = \frac{S_m - S_u (1 - DF)}{DF \times C_s}$$

As shown in Table 6-7, the percent recovery was 100±30% as required by Method 320.

| Table 6-7. Spike Recovery Results Summary |                 |                        |                 |                           |                 |                |
|-------------------------------------------|-----------------|------------------------|-----------------|---------------------------|-----------------|----------------|
| Direct Cylinder Spike, ppm                |                 | System Spiked Gas, ppm |                 | Native Concentration, ppm |                 | Recovery,<br>% |
| methanol                                  | SF <sub>6</sub> | methanol               | SF <sub>6</sub> | methanol                  | SF <sub>6</sub> |                |
| 102.30                                    | 2.86            | 9.000                  | 0.224           | 2.017                     | 0.012769        | 94.5           |

#### Minimum Detectable Concentration

EPA Method 320 and the equivalent ASTM Standard D6348-03 specify a number of analytical uncertainty parameters that the analyst may calculate to characterize the FTIR system performance.

#### QA Review

Before the test program began, an analysis of possible analytical interferents (e.g., H<sub>2</sub>O, CO<sub>2</sub>, CO, pinenes) was conducted. Analytical wavelengths were determined to minimize analytical uncertainty and detection limits using reference spectra and the FTIR instrument that was used for the field testing.

At the conclusion of the testing, a quality assurance review of the test data was performed. This review included examination of the sample spectra and the quantitative analytical results. It also included spot-checking the analysis results by hand. These examinations included visual comparisons of the sample and reference spectra.

## **7. PROCESS DOCUMENTATION**

Enviva Pellets Amory, LLC personnel logged the following process data during each test run of each process unit.

- Throughput in tons per hour (all process units)
- Inlet temperature (dryer)
- Outlet temperature (dryer)
- Cyclone static pressure drop (dryer, hammermill, presses)
- Wood feed % softwood content

## 8. REFERENCES

1. Enviva, LP. "Emission Testing Protocol." Submitted to Mississippi Department of Environmental Quality, July 31, 2013.
2. Environmental Monitoring Laboratories, Inc. "Investigative Air Emissions Tests, Enviva Pellets Wiggins, LLC.", November 15-16, 2012" Report to Enviva, LP, January 13, 2013.
3. Air Compliance Testing, Inc. "Self-Evaluation Engineering Study Test Report, Determination of Hydrogen Chloride Removal Efficiency and Total Gaseous Organic Emissions." Report to Georgia Biomass, LLC, August 27, 2012.
4. Richards, J., D. Goshaw, and T. Holder. "Laboratory Evaluation of VOC Emissions from Wood Pellet Processes." Report to Enviva, LP. July 31, 2013.
5. Beauchemin, P. and M. Tampier. "Emissions and Air Pollution Control for the Biomass Pellet Manufacturing Industry." Report submitted to the British Columbia Ministry of the Environment. May 12, 2010.
6. Milota, M.R. "Emissions from Wood Drying" Forest Projects Journal, Volume 50, Number 6, Pages 10-19, June 2000.
7. Milota, M. and P. Mosher. "Emissions of Hazardous Air Pollutants from Lumber Drying." Forest Products Journal, Volume 58, No. 7/8, Pages 50-55, July/August 2008.

## **APPENDIX A**

### **Moisture and Gas Flow Rate Data**

Air Control Techniques, PC: Emissions Calculations  
Job # 1909

| Enviva                          | Amory                             | Dryer      | Dryer      | Dryer      | Green      | Green      | Green      |
|---------------------------------|-----------------------------------|------------|------------|------------|------------|------------|------------|
| <b>PARAMETER</b>                | <b>NOMENCLATURE</b>               | 1          | 2          | 3          | Hammermill | Hammermill | Hammermill |
| Sampling Location               |                                   | Dryer      | Dryer      | Dryer      | Green      | Green      | Green      |
|                                 |                                   | Hammermill | Hammermill | Hammermill | 4          | 5          | 6          |
| Date                            |                                   | 10/14/2013 | 10/14/2013 | 10/14/2013 | 10/15/2013 | 10/15/2013 | 10/15/2013 |
| Run Time                        | $\theta$                          | 60         | 60         | 60         | 60         | 60         | 60         |
| Nozzle Diameter                 | inches                            | N/A        | N/A        | N/A        | N/A        | N/A        | N/A        |
| Stack Area                      | As - sq. ft.                      | 12.6       | 12.6       | 12.6       | 1.767      | 1.767      | 1.767      |
| Pitot Tube Coefficient          | Cp                                | 0.84       | 0.84       | 0.84       | 0.84       | 0.84       | 0.84       |
| Meter Calibration Factor        | Y                                 | 0.9828     | 0.9828     | 0.9828     | 0.9828     | 0.9828     | 0.9828     |
| Barometric Pressure, inches Hg  | Bp - in Hg                        | 29.80      | 29.80      | 29.80      | 29.80      | 29.80      | 29.80      |
| Static Pressure                 | Pg - in. H <sub>2</sub> O         | -2.6       | -2.6       | -2.6       | 3.6        | 3.6        | 3.6        |
| Stack Pressure                  | Ps                                | 29.61      | 29.61      | 29.61      | 30.06      | 30.06      | 30.06      |
| Meter Box Pressure Differential | $\Delta H$ - in. H <sub>2</sub> O | 1.00       | 1.00       | 1.00       | 1.00       | 1.00       | 1.00       |
| Average Velocity Head           | $\Delta p$ - in. H <sub>2</sub> O | 2.104      | 2.111      | 2.034      | 4.082      | 4.132      | 4.086      |
| Volume of Gas Sampled           | Vm - cu. ft.                      | 30.692     | 35.129     | 31.084     | 32.963     | 34.696     | 33.800     |
| Dry Gas Meter Temperature       | Tm - °F                           | 91.5       | 93.5       | 88.0       | 68.8       | 76.0       | 79.8       |
| Stack Temperature               | Ts - °F                           | 199.6      | 189.6      | 187.8      | 87.4       | 87.5       | 88.4       |
| Liquid Collected                | grams                             | 83.8       | 91.9       | 85.5       | 15.8       | 21.4       | 26         |
| Carbon Dioxide                  | % CO <sub>2</sub>                 | 2          | 1.5        | 2          | 0          | 0          | 0          |
| Oxygen                          | % O <sub>2</sub>                  | 19         | 19.5       | 19         | 20.9       | 20.9       | 20.9       |
| Carbon Monoxide                 | % CO                              | 0          | 0          | 0          | 0          | 0          | 0          |
| Nitrogen                        | % N <sub>2</sub>                  | 79         | 79         | 79         | 79.1       | 79.1       | 79.1       |
| Volume of Gas Sampled, Dry      | Vmstd - cu. ft.                   | 28.834     | 32.883     | 29.389     | 32.300     | 33.538     | 32.445     |
| Volume of Water Vapor           | Vwstd - cu. ft.                   | 3.951      | 4.333      | 4.031      | 0.745      | 1.009      | 1.226      |
| Moisture Content                | % H <sub>2</sub> O                | 12.05      | 11.64      | 12.06      | 2.25       | 2.92       | 3.64       |
| Saturation Moisture             | % H <sub>2</sub> O                | 78.5       | 63.5       | 61.2       | 4.4        | 4.4        | 4.5        |
| Dry Mole Fraction               | Mfd                               | 0.879      | 0.884      | 0.879      | 0.977      | 0.971      | 0.964      |
| Gas Molecular Weight, Dry       | Md                                | 29.08      | 29.02      | 29.08      | 28.84      | 28.84      | 28.84      |
| Gas Molecular Weight, Wet       | Ms                                | 27.74      | 27.74      | 27.74      | 28.59      | 28.52      | 28.44      |
| Gas Velocity                    | vs - ft./sec.                     | 93.35      | 92.80      | 90.96      | 115.79     | 116.64     | 116.25     |
| Volumetric Air Flow, Actual     | Qaw - ACFM                        | 70,382     | 69,968     | 68,582     | 12,277     | 12,367     | 12,326     |
| Volumetric Air Flow, Standard   | Qsd - DSCFM                       | 49,036     | 49,728     | 48,642     | 11,630     | 11,634     | 11,490     |

Air Control Techniques, PC: Emissions Calculations  
Job # 1909

| Enviva                          | Amory                      | Pellet Mill 2 | Pellet Mill 2 | Pellet Mill 2 | Dry        | Dry        | Dry        | Dry        |
|---------------------------------|----------------------------|---------------|---------------|---------------|------------|------------|------------|------------|
| PARAMETER                       | NOMENCLATURE               | Cooler        | Cooler        | Cooler        | Hammermill | Hammermill | Hammermill | Hammermill |
| Sampling Location               |                            | 8             | 9             | 10            | Baghouse   | Baghouse   | Baghouse   | Baghouse   |
|                                 |                            |               |               |               | 7          | 11         | 12         | 13         |
|                                 |                            | Pellet Mill 2 | Pellet Mill 2 | Pellet Mill 2 | Dry        | Dry        | Dry        | Dry        |
|                                 |                            | Cooler        | Cooler        | Cooler        | Hammermill | Hammermill | Hammermill | Hammermill |
|                                 |                            |               |               |               | Baghouse   | Baghouse   | Baghouse   | Baghouse   |
| Date                            |                            | 10/15/2013    | 10/15/2013    | 10/15/2013    | 10/15/2013 | 10/16/2013 | 10/16/2013 | 10/16/2013 |
| Run Time                        | θ                          | 60            | 60            | 60            | 60         | 60         | 60         | 61         |
| Nozzle Diameter                 | inches                     | N/A           | N/A           | N/A           | N/A        | N/A        | N/A        | N/A        |
| Stack Area                      | As - sq. ft.               | 3.1           | 3.1           | 3.1           | 7.9        | 7.9        | 7.9        | 7.9        |
| Pitot Tube Coefficient          | Cp                         | 0.84          | 0.84          | 0.84          | 0.84       | 0.84       | 0.84       | 0.84       |
| Meter Calibration Factor        | Y                          | 0.9828        | 0.9828        | 0.9828        | 0.9828     | 0.9828     | 0.9828     | 0.9828     |
| Barometric Pressure, inches Hg  | Bp - in Hg                 | 29.80         | 29.80         | 29.80         | 29.80      | 29.70      | 29.70      | 29.70      |
| Static Pressure                 | Pg - in. H <sub>2</sub> O  | -13.5         | -13.5         | -13.5         | -0.38      | -0.4       | -0.4       | -0.4       |
| Stack Pressure                  | Ps                         | 28.81         | 28.81         | 28.81         | 29.77      | 29.67      | 29.67      | 29.67      |
| Meter Box Pressure Differential | Δ H - in. H <sub>2</sub> O | 1.00          | 1.00          | 1.00          | 1.00       | 1.00       | 1.00       | 1.00       |
| Average Velocity Head           | Δ p - in. H <sub>2</sub> O | 1.529         | 1.521         | 1.521         | 0.512      | 0.483      | 0.500      | 0.491      |
| Volume of Gas Sampled           | Vm - cu. ft.               | 33.483        | 34.393        | 33.824        | 34.918     | 33.393     | 37.275     | 33.409     |
| Dry Gas Meter Temperature       | Tm - °F                    | 81.000        | 81.3          | 80.8          | 80.0       | 68.0       | 74.0       | 75.5       |
| Stack Temperature               | Ts - °F                    | 138.9         | 138.3         | 138.6         | 100.8      | 88.6       | 93.8       | 96.1       |
| Liquid Collected                | grams                      | 57            | 61.4          | 62.4          | 26.3       | 20.6       | 26.9       | 30.3       |
| Carbon Dioxide                  | % CO <sub>2</sub>          | 0             | 0             | 0             | 0          | 0          | 0          | 0          |
| Oxygen                          | % O <sub>2</sub>           | 20.9          | 20.9          | 20.9          | 20.9       | 20.9       | 20.9       | 20.9       |
| Carbon Monoxide                 | % CO                       | 0             | 0             | 0             | 0          | 0          | 0          | 0          |
| Nitrogen                        | % N <sub>2</sub>           | 79.1          | 79.1          | 79.1          | 79.1       | 79.1       | 79.1       | 79.1       |
| Volume of Gas Sampled, Dry      | Vmstd - cu. ft.            | 32.066        | 32.923        | 32.408        | 33.503     | 32.658     | 36.045     | 32.216     |
| Volume of Water Vapor           | Vwstd - cu. ft.            | 2.688         | 2.895         | 2.942         | 1.240      | 0.971      | 1.268      | 1.429      |
| Moisture Content                | % H <sub>2</sub> O         | 7.73          | 8.08          | 8.32          | 3.57       | 2.89       | 3.40       | 4.25       |
| Saturation Moisture             | % H <sub>2</sub> O         | 19.8          | 19.5          | 19.6          | 6.6        | 4.6        | 5.4        | 5.8        |
| Dry Mole Fraction               | Mfd                        | 0.923         | 0.919         | 0.917         | 0.964      | 0.971      | 0.966      | 0.958      |
| Gas Molecular Weight, Dry       | Md                         | 28.84         | 28.84         | 28.84         | 28.84      | 28.84      | 28.84      | 28.84      |
| Gas Molecular Weight, Wet       | Ms                         | 28.00         | 27.96         | 27.93         | 28.45      | 28.52      | 28.47      | 28.38      |
| Gas Velocity                    | vs - ft./sec.              | 76.51         | 76.33         | 76.38         | 41.81      | 40.17      | 41.11      | 40.89      |
| Volumetric Air Flow, Actual     | Qaw - ACFM                 | 14,422        | 14,387        | 14,397        | 19,757     | 18,980     | 19,427     | 19,321     |
| Volumetric Air Flow, Standard   | Qsd - DSCFM                | 11,294        | 11,236        | 11,210        | 17,849     | 17,591     | 17,745     | 17,421     |



**Method 1 - Air Control Techniques, P.C.**

Date

10/14/2013

Client Enviva  
Job # 1909  
Plant Name Amory  
State Mississippi  
City Amory  
Sampling Location Dryer

No. of Ports Available 2  
No. of Ports Used 2  
Port Inside Diameter, Inches 1.5  
Distance From Far Wall To Outside Of Port, Inches 50  
Nipple Length And/Or Wall Thickness, Inches 2  
Depth Of Stack Or Duct, Inches 48  
Stack Or Duct Width (if rectangular), Inches  
Equiv. Diameter = 2DW/(D+W), Inches 48  
Stack/Duct Area, Square Feet 12.57

(□ x R<sup>2</sup> or L x W)

Upstream Downstream

Distance to Flow Disturbances, Inches 342 126  
Diameters 7.13 2.63

**Point Location Data**

| Point | % of Duct<br>Depth | Distance From<br>Inside Wall | Distance From<br>Outside of Port |
|-------|--------------------|------------------------------|----------------------------------|
| 1     | 4.4                | 2 1/8                        | 4 1/8                            |
| 2     | 14.6               | 7                            | 9                                |
| 3     | 29.6               | 14 2/8                       | 16 2/8                           |
| 4     | 70.4               | 33 6/8                       | 35 6/8                           |
| 5     | 85.4               | 41                           | 43                               |
| 6     | 95.6               | 45 7/8                       | 47 7/8                           |
| 7     |                    |                              |                                  |
| 8     |                    |                              |                                  |
| 9     |                    |                              |                                  |
| 10    |                    |                              |                                  |
| 11    |                    |                              |                                  |
| 12    |                    |                              |                                  |
| 13    |                    |                              |                                  |
| 14    |                    |                              |                                  |
| 15    |                    |                              |                                  |
| 16    |                    |                              |                                  |
| 17    |                    |                              |                                  |
| 18    |                    |                              |                                  |
| 19    |                    |                              |                                  |
| 20    |                    |                              |                                  |
| 21    |                    |                              |                                  |
| 22    |                    |                              |                                  |
| 23    |                    |                              |                                  |
| 24    |                    |                              |                                  |
| 25    |                    |                              |                                  |

Note: If more than 8 and 2 diameters and if duct dia.  
is less than 24" use 8 or 9 points.

| Velocity | UP | Down | Particulate |
|----------|----|------|-------------|
| 12       | 8  | 2    | 12          |
| 12       | 7  | 1.75 | 12          |
| 12       | 6  | 1.5  | 16          |
| 16       | 5  | 1.25 | 20          |
| 16       | 2  | 0.5  | 24 or 25    |

**Location of Points in Circular Stacks or Ducts**

|    | 4    | 6    | 8    | 10   | 12   | 14   | 16   | 18   | 20   | 22   | 24   |
|----|------|------|------|------|------|------|------|------|------|------|------|
| 1  | 6.7  | 4.4  | 3.2  | 2.6  | 2.1  | 1.8  | 1.6  | 1.4  | 1.3  | 1.1  | 1.1  |
| 2  | 25.0 | 14.6 | 10.6 | 8.2  | 6.7  | 5.7  | 4.9  | 4.4  | 3.9  | 3.5  | 3.2  |
| 3  | 75.0 | 29.6 | 19.4 | 14.6 | 11.8 | 9.9  | 8.5  | 7.5  | 6.7  | 6.0  | 5.5  |
| 4  | 93.3 | 70.4 | 32.3 | 22.6 | 17.7 | 14.6 | 12.5 | 10.9 | 9.7  | 8.7  | 7.9  |
| 5  |      | 85.4 | 67.7 | 34.2 | 25.0 | 20.1 | 16.9 | 14.6 | 12.9 | 11.6 | 10.5 |
| 6  |      | 95.6 | 80.6 | 65.8 | 35.6 | 26.9 | 22.0 | 18.8 | 16.5 | 14.6 | 13.2 |
| 7  |      |      | 89.5 | 77.4 | 64.4 | 36.6 | 28.3 | 23.6 | 20.4 | 18.0 | 16.1 |
| 8  |      |      | 96.8 | 85.4 | 75.0 | 63.4 | 37.5 | 29.6 | 25.0 | 21.8 | 19.4 |
| 9  |      |      |      | 91.8 | 82.3 | 73.1 | 62.5 | 38.2 | 30.6 | 26.2 | 23.0 |
| 10 |      |      |      | 97.4 | 88.2 | 79.9 | 71.7 | 61.8 | 38.8 | 31.5 | 27.2 |
| 11 |      |      |      |      | 93.3 | 85.4 | 78.0 | 70.4 | 61.2 | 39.3 | 32.3 |
| 12 |      |      |      |      | 97.9 | 90.1 | 83.1 | 76.4 | 69.4 | 60.7 | 39.8 |
| 13 |      |      |      |      |      | 94.3 | 87.6 | 81.2 | 75.0 | 68.5 | 60.2 |
| 14 |      |      |      |      |      | 98.2 | 91.5 | 85.4 | 79.6 | 73.8 | 67.7 |
| 15 |      |      |      |      |      |      | 95.1 | 89.1 | 83.5 | 78.2 | 72.8 |
| 16 |      |      |      |      |      |      | 98.4 | 92.5 | 87.1 | 82.0 | 77.0 |
| 17 |      |      |      |      |      |      |      | 95.6 | 90.3 | 85.4 | 80.6 |
| 18 |      |      |      |      |      |      |      | 98.6 | 93.3 | 88.4 | 83.9 |
| 19 |      |      |      |      |      |      |      |      | 96.1 | 91.3 | 86.8 |
| 20 |      |      |      |      |      |      |      |      | 98.7 | 94.0 | 89.5 |
| 21 |      |      |      |      |      |      |      |      |      | 96.5 | 92.1 |
| 22 |      |      |      |      |      |      |      |      |      | 98.9 | 94.5 |
| 23 |      |      |      |      |      |      |      |      |      |      | 96.8 |
| 24 |      |      |      |      |      |      |      |      |      |      | 96.9 |

**Location of Points in Rectangular Stacks or Ducts**

|    | 2  | 3    | 4    | 5    | 6    | 7    | 8    | 9    | 10   | 11   | 12   |
|----|----|------|------|------|------|------|------|------|------|------|------|
| 1  | 25 | 16.7 | 12.5 | 10.0 | 8.3  | 7.1  | 6.3  | 5.6  | 5.0  | 4.5  | 4.2  |
| 2  | 75 | 50   | 37.5 | 30.0 | 25   | 21.4 | 18.8 | 16.7 | 15.0 | 13.6 | 12.5 |
| 3  |    | 83.3 | 62.5 | 50.0 | 41.7 | 35.7 | 31.3 | 27.8 | 25.0 | 22.7 | 20.8 |
| 4  |    |      | 87.5 | 70.0 | 58.3 | 50   | 43.8 | 38.9 | 35.0 | 31.8 | 29.2 |
| 5  |    |      |      | 90.0 | 75   | 64.3 | 56.3 | 50   | 45.0 | 40.9 | 37.5 |
| 6  |    |      |      |      | 91.7 | 78.6 | 68.8 | 61.1 | 55.0 | 50   | 45.8 |
| 7  |    |      |      |      |      | 92.9 | 81.3 | 72.2 | 65.0 | 59.1 | 54.2 |
| 8  |    |      |      |      |      |      | 93.8 | 83.3 | 75.0 | 68.2 | 62.5 |
| 9  |    |      |      |      |      |      |      | 94.4 | 85.0 | 77.3 | 70.8 |
| 10 |    |      |      |      |      |      |      |      | 95.0 | 86.4 | 79.2 |
| 11 |    |      |      |      |      |      |      |      |      | 95.5 | 87.5 |
| 12 |    |      |      |      |      |      |      |      |      |      | 96.8 |

0.0000 - 0.0625 - 0 0.5625 - 0.6875 - 5/8  
0.0625 - 0.1875 - 1/8 0.6875 - 0.8125 - 3/4  
0.1875 - 0.3125 - 1/4 0.8125 - 0.9375 - 7/8  
0.3125 - 0.4375 - 3/8 0.9375 - 1.0000 - 1  
0.4375 - 0.5625 - 1/2

Dryer Run 1

|                                                |                 |              |              |                                                                   |                |                    |  |
|------------------------------------------------|-----------------|--------------|--------------|-------------------------------------------------------------------|----------------|--------------------|--|
| Air Control Techniques EPA Method 2 Data Sheet |                 |              |              | ACT Job Number                                                    |                | 1909               |  |
| Client                                         | Enviva          |              |              | ACT Run Number                                                    |                | 1                  |  |
| Plant                                          | Amory           |              |              | Date                                                              |                | 10/14/2013         |  |
| City/State                                     | Amory, MS       |              |              | Gauge ID                                                          |                | 909033             |  |
| Location                                       | Dryer           |              |              | Pitot ID                                                          |                | 4Pext              |  |
| <b>Averages</b>                                |                 | <b>2.104</b> | <b>199.6</b> | Thermocouple ID                                                   |                | TC25               |  |
|                                                | <b>Delta P</b>  | <b>Temp</b>  |              |                                                                   |                |                    |  |
| <b>Point No.</b>                               | <b>In Water</b> | <b>Deg F</b> | <b>Angle</b> |                                                                   |                |                    |  |
| <b>A-1</b>                                     | 2.700           | 195          | -3           | <b>Oxygen %</b>                                                   |                | <b>19</b>          |  |
| <b>2</b>                                       | 2.900           | 200          | -2           |                                                                   |                |                    |  |
| <b>3</b>                                       | 2.800           | 202          | 0            | <b>Carbon Dioxide %</b>                                           |                | <b>2</b>           |  |
| <b>4</b>                                       | 2.800           | 201          | -3           |                                                                   |                |                    |  |
| <b>5</b>                                       | 1.300           | 200          | 0            | <b>Moisture %</b>                                                 |                | <b>12.05172839</b> |  |
| <b>6</b>                                       | 0.980           | 198          | 0            |                                                                   |                |                    |  |
| <b>B-1</b>                                     | 1.300           | 201          | -4           | <b>Stack Area sq.in.</b>                                          |                | <b>1809.557395</b> |  |
| <b>2</b>                                       | 1.100           | 198          | -2           |                                                                   |                |                    |  |
| <b>3</b>                                       | 1.900           | 200          | 3            | <b>Pbar</b>                                                       |                | <b>29.80</b>       |  |
| <b>4</b>                                       | 3.000           | 200          | 0            |                                                                   |                |                    |  |
| <b>5</b>                                       | 2.800           | 200          | 4            | <b>Static Pressure</b>                                            |                | <b>-2.6</b>        |  |
| <b>6</b>                                       | 2.600           | 200          | 2            |                                                                   |                |                    |  |
|                                                |                 |              |              | <b>Pitot Coef.</b>                                                |                | <b>0.84</b>        |  |
|                                                |                 |              |              |                                                                   |                |                    |  |
|                                                |                 |              |              | <b>Start Time</b>                                                 |                | <b>1428</b>        |  |
|                                                |                 |              |              |                                                                   |                |                    |  |
|                                                |                 |              |              | <b>Stop Time</b>                                                  |                | <b>1434</b>        |  |
|                                                |                 |              |              |                                                                   |                |                    |  |
|                                                |                 |              |              | <b>Absolute Gas Pressure inches water</b>                         | <b>Ps =</b>    | <b>29.61</b>       |  |
|                                                |                 |              |              |                                                                   |                |                    |  |
|                                                |                 |              |              | <b>Dry Mole Fraction of Gas</b>                                   | <b>Mfd =</b>   | <b>0.87948</b>     |  |
|                                                |                 |              |              |                                                                   |                |                    |  |
|                                                |                 |              |              | <b>Dry Molecular Weight of Gas lb/lb Mole</b>                     | <b>Md =</b>    | <b>29.08</b>       |  |
|                                                |                 |              |              |                                                                   |                |                    |  |
|                                                |                 |              |              | <b>Wet Molecular Weight of Gas lb/lb Mole</b>                     | <b>Ms =</b>    | <b>27.74</b>       |  |
|                                                |                 |              |              |                                                                   |                |                    |  |
|                                                |                 |              |              | <b>Average Gas Velocity ft/sec</b>                                | <b>vs =</b>    | <b>93.35</b>       |  |
|                                                |                 |              |              |                                                                   |                |                    |  |
|                                                |                 |              |              | <b>Dry Volumetric Gas Flow Rate at Standard Conditions SCFM</b>   | <b>Qsd =</b>   | <b>49036</b>       |  |
|                                                |                 |              |              |                                                                   |                |                    |  |
|                                                |                 |              |              | <b>Wet Volumetric Flue Gas Flow Rate at Stack Conditions ACFM</b> | <b>Qaw =</b>   | <b>70382</b>       |  |
|                                                |                 |              |              |                                                                   |                |                    |  |
|                                                |                 |              |              | <b>Wet Volumetric Gas Flow Rate at Standard Conditions WSCFH</b>  | <b>WSCFH =</b> | <b>3345299</b>     |  |
|                                                |                 |              |              |                                                                   |                |                    |  |
|                                                |                 |              |              | <b>LKCH</b>                                                       |                |                    |  |
|                                                |                 |              |              | <b>Pre</b>                                                        | <b>3-4</b>     | <b>good</b>        |  |
|                                                |                 |              |              | <b>Post</b>                                                       | <b>5-3</b>     | <b>good</b>        |  |
|                                                |                 |              |              |                                                                   |                |                    |  |

Dryer Run 2

|                                                |                 |              |              |                                               |  |                    |                |
|------------------------------------------------|-----------------|--------------|--------------|-----------------------------------------------|--|--------------------|----------------|
| Air Control Techniques EPA Method 2 Data Sheet |                 |              |              | ACT Job Number                                |  | 1909               |                |
| Client                                         | Enviva          |              |              | ACT Run Number                                |  | 2                  |                |
| Plant                                          | Amory           |              |              | Date                                          |  | 10/14/13           |                |
| City/State                                     | Amory, MS       |              |              | Gauge ID                                      |  | 909033             |                |
| Location                                       | Dryer           |              |              | Pitot ID                                      |  | 4Pext              |                |
| <b>Averages</b>                                |                 | <b>2.111</b> | <b>189.6</b> | Thermocouple ID                               |  | TC25               |                |
|                                                | <b>Delta P</b>  | <b>Temp</b>  |              |                                               |  |                    |                |
| <b>Point No.</b>                               | <b>In Water</b> | <b>Deg F</b> |              |                                               |  |                    |                |
| A-1                                            | 2.700           | 189          |              | <b>Oxygen %</b>                               |  | <b>19.5</b>        |                |
| 2                                              | 3.200           | 188          |              |                                               |  |                    |                |
| 3                                              | 3.000           | 188          |              | <b>Carbon Dioxide %</b>                       |  | <b>1.5</b>         |                |
| 4                                              | 1.800           | 188          |              |                                               |  |                    |                |
| 5                                              | 1.600           | 190          |              | <b>Moisture %</b>                             |  | <b>11.64</b>       |                |
| 6                                              | 1.200           | 189          |              |                                               |  |                    |                |
| B-1                                            | 1.300           | 189          |              | <b>Stack Area sq.in.</b>                      |  | <b>1809.557395</b> |                |
| 2                                              | 1.700           | 190          |              |                                               |  |                    |                |
| 3                                              | 2.100           | 190          |              | <b>Pbar</b>                                   |  | <b>29.80</b>       |                |
| 4                                              | 2.500           | 192          |              |                                               |  |                    |                |
| 5                                              | 2.600           | 192          |              | <b>Static Pressure</b>                        |  | <b>-2.6</b>        |                |
| 6                                              | 2.200           | 190          |              |                                               |  |                    |                |
| 0                                              |                 |              |              | <b>Pitot Coef.</b>                            |  | <b>0.84</b>        |                |
| 0                                              |                 |              |              |                                               |  |                    |                |
| 0                                              |                 |              |              | <b>Start Time</b>                             |  | <b>1621</b>        |                |
| 0                                              |                 |              |              |                                               |  |                    |                |
| 0                                              |                 |              |              | <b>Stop Time</b>                              |  | <b>1624</b>        |                |
| 0                                              |                 |              |              |                                               |  |                    |                |
| 0                                              |                 |              |              | <b>Absolute Gas Pressure inches water</b>     |  | <b>Ps =</b>        | <b>29.61</b>   |
| 0                                              |                 |              |              |                                               |  |                    |                |
| 0                                              |                 |              |              | <b>Dry Mole Fraction of Gas</b>               |  | <b>Mfd =</b>       | <b>0.88357</b> |
| 0                                              |                 |              |              |                                               |  |                    |                |
| 0                                              |                 |              |              | <b>Dry Molecular Weight of Gas lb/lb Mole</b> |  | <b>Md =</b>        | <b>29.02</b>   |
| 0                                              |                 |              |              |                                               |  |                    |                |
| 0                                              |                 |              |              | <b>Wet Molecular Weight of Gas lb/lb Mole</b> |  | <b>Ms =</b>        | <b>27.74</b>   |
| 0                                              |                 |              |              |                                               |  |                    |                |
| 0                                              |                 |              |              | <b>Average Gas Velocity ft/sec</b>            |  | <b>vs =</b>        | <b>92.80</b>   |
| 0                                              |                 |              |              |                                               |  |                    |                |
| 0                                              |                 |              |              | <b>Dry Volumetric Gas Flow Rate</b>           |  |                    |                |
| 0                                              |                 |              |              | <b>at Standard Conditions SCFM</b>            |  | <b>Qsd =</b>       | <b>49728</b>   |
| 0                                              |                 |              |              |                                               |  |                    |                |
| 0                                              |                 |              |              | <b>Wet Volumetric Flue Gas Flow Rate</b>      |  |                    |                |
| 0                                              |                 |              |              | <b>at Stack Conditions ACFM</b>               |  | <b>Qaw =</b>       | <b>69968</b>   |
| 0                                              |                 |              |              |                                               |  |                    |                |
| 0                                              |                 |              |              | <b>Wet Volumetric Gas Flow Rate</b>           |  |                    |                |
| 0                                              |                 |              |              | <b>at Standard Conditions WSCFH</b>           |  | <b>WSCFH =</b>     | <b>3376837</b> |
| 0                                              |                 |              |              |                                               |  |                    |                |
| 0                                              |                 |              |              | <b>LKCH</b>                                   |  |                    |                |
| 0                                              |                 |              |              | <b>Pre</b>                                    |  | <b>3-4</b>         | <b>good</b>    |
| 0                                              |                 |              |              | <b>Post</b>                                   |  | <b>5-3</b>         | <b>good</b>    |
|                                                |                 |              |              |                                               |  |                    |                |
|                                                |                 |              |              |                                               |  |                    |                |

### Dryer Run 3

|                        |              |            |                                        |             |         |
|------------------------|--------------|------------|----------------------------------------|-------------|---------|
| Air Control Techniques | EPA Method 2 | Data Sheet | ACT Job Number                         | 1909        |         |
| Client                 | Enviva       |            | ACT Run Number                         | 3           |         |
| Plant                  | Amory        |            | Date                                   | 10/14/13    |         |
| City/State             | Amory, MS    |            | Gauge ID                               | 909033      |         |
| Location               | Dryer        |            | Pitot ID                               | 4Pext       |         |
| Averages               | 2.034        | 187.8      | Thermocouple ID                        | TC25        |         |
|                        | Delta P      | Temp       |                                        |             |         |
| Point No.              | In Water     | Deg F      |                                        |             |         |
| A-1                    | 2.600        | 185        | Oxygen %                               | 19          |         |
| 2                      | 3.000        | 187        |                                        |             |         |
| 3                      | 3.000        | 188        | Carbon Dioxide %                       | 2           |         |
| 4                      | 1.700        | 188        |                                        |             |         |
| 5                      | 1.300        | 187        | Moisture %                             | 11.64       |         |
| 6                      | 1.050        | 185        |                                        |             |         |
| B-1                    | 1.200        | 187        | Stack Area sq.in.                      | 1809.557395 |         |
| 2                      | 1.600        | 190        |                                        |             |         |
| 3                      | 2.000        | 189        | Pbar                                   | 29.80       |         |
| 4                      | 2.800        | 190        |                                        |             |         |
| 5                      | 2.800        | 189        | Static Pressure                        | -2.6        |         |
| 6                      | 2.100        | 189        |                                        |             |         |
| 0                      |              |            | Pitot Coef.                            | 0.84        |         |
| 0                      |              |            |                                        |             |         |
| 0                      |              |            | Start Time                             | 1746        |         |
| 0                      |              |            |                                        |             |         |
| 0                      |              |            | Stop Time                              | 1751        |         |
| 0                      |              |            |                                        |             |         |
| 0                      |              |            | Absolute Gas Pressure inches water     | Ps =        | 29.61   |
| 0                      |              |            |                                        |             |         |
| 0                      |              |            | Dry Mole Fraction of Gas               | Mfd =       | 0.88357 |
| 0                      |              |            |                                        |             |         |
| 0                      |              |            | Dry Molecular Weight of Gas lb/lb Mole | Md =        | 29.08   |
| 0                      |              |            |                                        |             |         |
| 0                      |              |            | Wet Molecular Weight of Gas lb/lb Mole | Ms =        | 27.79   |
| 0                      |              |            |                                        |             |         |
| 0                      |              |            | Average Gas Velocity ft/sec            | vs =        | 90.88   |
| 0                      |              |            |                                        |             |         |
| 0                      |              |            | Dry Volumetric Gas Flow Rate           |             |         |
| 0                      |              |            | at Standard Conditions SCFM            | Qsd =       | 48833   |
| 0                      |              |            |                                        |             |         |
| 0                      |              |            | Wet Volumetric Flue Gas Flow Rate      |             |         |
| 0                      |              |            | at Stack Conditions ACFM               | Qaw =       | 68524   |
| 0                      |              |            |                                        |             |         |
| 0                      |              |            | Wet Volumetric Gas Flow Rate           |             |         |
| 0                      |              |            | at Standard Conditions WSCFH           | WSCFH =     | 3316084 |
| 0                      |              |            |                                        |             |         |
| 0                      |              |            | LKCH                                   |             |         |
| 0                      |              |            | Pre                                    | 3-4         | good    |
| 0                      |              |            | Post                                   | 5-3         | good    |
|                        |              |            |                                        |             |         |
|                        |              |            |                                        |             |         |

**Method 1 - Air Control Techniques, P.C.**

Date

10/14/2013

Client Enviva  
Job # 1909  
Plant Name Amory  
State Mississippi  
City Amory  
Sampling Location Dry Hammermill Baghouse

No. of Ports Available 2  
No. of Ports Used 2  
Port Inside Diameter, Inches 2  
Distance From Far Wall To Outside Of Port, Inches 38  
Nipple Length And/Or Wall Thickness, Inches 0  
Depth Of Stack Or Duct, Inches 38  
Stack Or Duct Width (if rectangular), Inches  
Equiv. Diameter = 2DW/(D+W), Inches 38  
Stack/Duct Area, Square Feet 7.9  
(□ x R<sup>2</sup> or L x W)

Upstream Downstream  
Distance to Flow Disturbances, Inches 120 60  
Diameters 3.16 1.58

**Point Location Data**

| Point | % of Duct<br>Depth | Distance From<br>Inside Wall | Distance From<br>Outside of Port |
|-------|--------------------|------------------------------|----------------------------------|
| 1     | 3.2                | 1 2/8                        | 1 2/8                            |
| 2     | 10.6               | 4                            | 4                                |
| 3     | 19.4               | 7 3/8                        | 7 3/8                            |
| 4     | 32.3               | 12 2/8                       | 12 2/8                           |
| 5     | 67.7               | 25 6/8                       | 25 6/8                           |
| 6     | 80.6               | 30 5/8                       | 30 5/8                           |
| 7     | 89.5               | 34                           | 34                               |
| 8     | 96.8               | 36 6/8                       | 36 6/8                           |
| 9     |                    |                              |                                  |
| 10    |                    |                              |                                  |
| 11    |                    |                              |                                  |
| 12    |                    |                              |                                  |
| 13    |                    |                              |                                  |
| 14    |                    |                              |                                  |
| 15    |                    |                              |                                  |
| 16    |                    |                              |                                  |
| 17    |                    |                              |                                  |
| 18    |                    |                              |                                  |
| 19    |                    |                              |                                  |
| 20    |                    |                              |                                  |
| 21    |                    |                              |                                  |
| 22    |                    |                              |                                  |
| 23    |                    |                              |                                  |
| 24    |                    |                              |                                  |
| 25    |                    |                              |                                  |

Note: If more than 8 and 2 diameters and if duct dia.  
is less than 24" use 8 or 9 points.

| Velocity | UP | Down | Particulate |
|----------|----|------|-------------|
| 12       | 8  | 2    | 12          |
| 12       | 7  | 1.75 | 12          |
| 12       | 6  | 1.5  | 16          |
| 16       | 5  | 1.25 | 20          |
| 16       | 2  | 0.5  | 24 or 25    |

**Location of Points in Circular Stacks or Ducts**

|    | 4    | 6    | 8    | 10   | 12   | 14   | 16   | 18   | 20   | 22   | 24   |
|----|------|------|------|------|------|------|------|------|------|------|------|
| 1  | 6.7  | 4.4  | 3.2  | 2.6  | 2.1  | 1.8  | 1.6  | 1.4  | 1.3  | 1.1  | 1.1  |
| 2  | 25.0 | 14.6 | 10.6 | 8.2  | 6.7  | 5.7  | 4.9  | 4.4  | 3.9  | 3.5  | 3.2  |
| 3  | 75.0 | 29.6 | 19.4 | 14.6 | 11.8 | 9.9  | 8.5  | 7.5  | 6.7  | 6.0  | 5.5  |
| 4  | 93.3 | 70.4 | 32.3 | 22.6 | 17.7 | 14.6 | 12.5 | 10.9 | 9.7  | 8.7  | 7.9  |
| 5  |      | 85.4 | 67.7 | 34.2 | 25.0 | 20.1 | 16.9 | 14.6 | 12.9 | 11.6 | 10.5 |
| 6  |      | 95.6 | 80.6 | 65.8 | 35.6 | 26.9 | 22.0 | 18.8 | 16.5 | 14.6 | 13.2 |
| 7  |      |      | 89.5 | 77.4 | 64.4 | 36.6 | 28.3 | 23.6 | 20.4 | 18.0 | 16.1 |
| 8  |      |      | 96.8 | 85.4 | 75.0 | 63.4 | 37.5 | 29.6 | 25.0 | 21.8 | 19.4 |
| 9  |      |      |      | 91.8 | 82.3 | 73.1 | 62.5 | 38.2 | 30.6 | 26.2 | 23.0 |
| 10 |      |      |      | 97.4 | 88.2 | 79.9 | 71.7 | 61.8 | 38.8 | 31.5 | 27.2 |
| 11 |      |      |      |      | 93.3 | 85.4 | 78.0 | 70.4 | 61.2 | 39.3 | 32.3 |
| 12 |      |      |      |      | 97.9 | 90.1 | 83.1 | 76.4 | 69.4 | 60.7 | 39.8 |
| 13 |      |      |      |      |      | 94.3 | 87.6 | 81.2 | 75.0 | 68.5 | 60.2 |
| 14 |      |      |      |      |      | 98.2 | 91.5 | 85.4 | 79.6 | 73.8 | 67.7 |
| 15 |      |      |      |      |      |      | 95.1 | 89.1 | 83.5 | 78.2 | 72.8 |
| 16 |      |      |      |      |      |      | 98.4 | 92.5 | 87.1 | 82.0 | 77.0 |
| 17 |      |      |      |      |      |      |      | 95.6 | 90.3 | 85.4 | 80.6 |
| 18 |      |      |      |      |      |      |      | 98.6 | 93.3 | 88.4 | 83.9 |
| 19 |      |      |      |      |      |      |      |      | 96.1 | 91.3 | 86.8 |
| 20 |      |      |      |      |      |      |      |      | 98.7 | 94.0 | 89.5 |
| 21 |      |      |      |      |      |      |      |      |      | 96.5 | 92.1 |
| 22 |      |      |      |      |      |      |      |      |      | 98.9 | 94.5 |
| 23 |      |      |      |      |      |      |      |      |      |      | 96.8 |
| 24 |      |      |      |      |      |      |      |      |      |      | 98.9 |

**Location of Points in Rectangular Stacks or Ducts**

|    | 2  | 3    | 4    | 5    | 6    | 7    | 8    | 9    | 10   | 11   | 12   |
|----|----|------|------|------|------|------|------|------|------|------|------|
| 1  | 25 | 16.7 | 12.5 | 10.0 | 8.3  | 7.1  | 6.3  | 5.6  | 5.0  | 4.5  | 4.2  |
| 2  | 75 | 50   | 37.5 | 30.0 | 25   | 21.4 | 18.8 | 16.7 | 15.0 | 13.6 | 12.5 |
| 3  |    | 83.3 | 62.5 | 50.0 | 41.7 | 35.7 | 31.3 | 27.8 | 25.0 | 22.7 | 20.8 |
| 4  |    |      | 87.5 | 70.0 | 58.3 | 50   | 43.8 | 28.9 | 35.0 | 31.8 | 29.2 |
| 5  |    |      |      | 90.0 | 75   | 64.3 | 56.3 | 50   | 45.0 | 40.9 | 37.5 |
| 6  |    |      |      |      | 91.7 | 78.6 | 68.8 | 61.1 | 55.0 | 50   | 45.8 |
| 7  |    |      |      |      |      | 92.9 | 81.3 | 72.2 | 65.0 | 59.1 | 54.2 |
| 8  |    |      |      |      |      |      | 93.8 | 83.3 | 75.0 | 68.2 | 62.5 |
| 9  |    |      |      |      |      |      |      | 94.4 | 85.0 | 77.3 | 70.8 |
| 10 |    |      |      |      |      |      |      |      | 95.0 | 86.4 | 79.2 |
| 11 |    |      |      |      |      |      |      |      |      | 95.5 | 87.5 |
| 12 |    |      |      |      |      |      |      |      |      |      | 95.8 |

0.0000 - 0.0625 - 0 0.5625 - 0.6875 - 5/8  
0.0625 - 0.1875 - 1/8 0.6875 - 0.8125 - 3/4  
0.1875 - 0.3125 - 1/4 0.8125 - 0.9375 - 7/8  
0.3125 - 0.4375 - 3/8 0.9375 - 1.0000 - 1  
0.4375 - 0.5625 - 1/2

|                                                |                         |       |       |                                        |             |            |  |
|------------------------------------------------|-------------------------|-------|-------|----------------------------------------|-------------|------------|--|
| Air Control Techniques EPA Method 2 Data Sheet |                         |       |       | ACT Job Number                         |             | 1909       |  |
| Client                                         | Enviva                  |       |       | ACT Run Number                         |             | 7          |  |
| Plant                                          | Amory                   |       |       | Date                                   |             | 10/15/2013 |  |
| City/State                                     | Amory, MS               |       |       | Gauge ID                               |             | 909033     |  |
| Location                                       | Dry Hammermill Baghouse |       |       | Pitot ID                               |             | 4Pext      |  |
| Averages                                       | 0.512                   | 100.8 |       | Thermocouple ID                        |             | TC25       |  |
|                                                | Delta P                 | Temp  |       |                                        |             |            |  |
| Point No.                                      | In Water                | Deg F | Angle |                                        |             |            |  |
| A-1                                            | 0.440                   | 99    | 0     | Oxygen %                               | 20.9        |            |  |
| 2                                              | 0.460                   | 100   | 0     |                                        |             |            |  |
| 3                                              | 0.520                   | 100   | 3     | Carbon Dioxide %                       | 0           |            |  |
| 4                                              | 0.530                   | 101   | 4     |                                        |             |            |  |
| 5                                              | 0.520                   | 101   | 3     | Moisture %                             | 3.57        |            |  |
| 6                                              | 0.520                   | 101   | 0     |                                        |             |            |  |
| 7                                              | 0.430                   | 101   | 0     | Stack Area sq.in.                      | 1134.114965 |            |  |
| 8                                              | 0.350                   | 99    | -5    |                                        |             |            |  |
| B-1                                            | 0.230                   | 99    | 4     | Pbar                                   | 29.80       |            |  |
| 2                                              | 0.270                   | 101   | 0     |                                        |             |            |  |
| 3                                              | 0.320                   | 101   | 2     | Static Pressure                        | -0.38       |            |  |
| 4                                              | 0.520                   | 102   | 3     |                                        |             |            |  |
| 5                                              | 0.750                   | 102   | 4     | Pitot Coef.                            | 0.84        |            |  |
| 6                                              | 0.940                   | 102   | 3     |                                        |             |            |  |
| 7                                              | 0.950                   | 102   | 0     | Start Time                             | 1316        |            |  |
| 8                                              | 0.760                   | 102   | 0     |                                        |             |            |  |
| 0                                              |                         |       |       | Stop Time                              | 1322        |            |  |
| 0                                              |                         |       |       |                                        |             |            |  |
| 0                                              |                         |       |       | Absolute Gas Pressure inches water     | Ps =        | 29.77      |  |
| 0                                              |                         |       |       |                                        |             |            |  |
| 0                                              |                         |       |       | Dry Mole Fraction of Gas               | Mfd =       | 0.96431    |  |
| 0                                              |                         |       |       |                                        |             |            |  |
| 0                                              |                         |       |       | Dry Molecular Weight of Gas lb/lb Mole | Md =        | 28.84      |  |
| 0                                              |                         |       |       |                                        |             |            |  |
| 0                                              |                         |       |       | Wet Molecular Weight of Gas lb/lb Mole | Ms =        | 28.45      |  |
| 0                                              |                         |       |       |                                        |             |            |  |
| 0                                              |                         |       |       | Average Gas Velocity ft/sec            | vs =        | 41.81      |  |
| 0                                              |                         |       |       |                                        |             |            |  |
| 0                                              |                         |       |       | Dry Volumetric Gas Flow Rate           |             |            |  |
| 0                                              |                         |       |       | at Standard Conditions SCFM            | Qsd =       | 17849      |  |
| 0                                              |                         |       |       |                                        |             |            |  |
| 0                                              |                         |       |       | Wet Volumetric Flue Gas Flow Rate      |             |            |  |
| 0                                              |                         |       |       | at Stack Conditions ACFM               | Qaw =       | 19757      |  |
| 0                                              |                         |       |       |                                        |             |            |  |
| 0                                              |                         |       |       | Wet Volumetric Gas Flow Rate           |             |            |  |
| 0                                              |                         |       |       | at Standard Conditions WSCFH           | WSCFH =     | 1110565    |  |
| 0                                              |                         |       |       |                                        |             |            |  |
| 0                                              |                         |       |       | LKCH                                   |             |            |  |
| 0                                              |                         |       |       | Pre                                    | 3-4         | good       |  |
| 0                                              |                         |       |       | Post                                   | 5-3         | good       |  |
| 0                                              |                         |       |       |                                        |             |            |  |
| 0                                              |                         |       |       |                                        |             |            |  |

|                                                |                         |       |  |                                        |  |             |         |
|------------------------------------------------|-------------------------|-------|--|----------------------------------------|--|-------------|---------|
| Air Control Techniques EPA Method 2 Data Sheet |                         |       |  | ACT Job Number                         |  | 1909        |         |
| Client                                         | Enviva                  |       |  | ACT Run Number                         |  | 11          |         |
| Plant                                          | Amory                   |       |  | Date                                   |  | 10/16/2013  |         |
| City/State                                     | Amory, MS               |       |  | Gauge ID                               |  | 909033      |         |
| Location                                       | Dry Hammermill Baghouse |       |  | Pitot ID                               |  | 4Pext       |         |
| Averages                                       | 0.483                   | 88.6  |  | Thermocouple ID                        |  | TC25        |         |
|                                                | Delta P                 | Temp  |  |                                        |  |             |         |
| Point No.                                      | In Water                | Deg F |  |                                        |  |             |         |
| A-1                                            | 0.450                   | 87    |  | Oxygen %                               |  | 20.9        |         |
| 2                                              | 0.470                   | 88    |  |                                        |  |             |         |
| 3                                              | 0.510                   | 88    |  | Carbon Dioxide %                       |  | 0           |         |
| 4                                              | 0.530                   | 88    |  |                                        |  |             |         |
| 5                                              | 0.520                   | 88    |  | Moisture %                             |  | 2.89        |         |
| 6                                              | 0.520                   | 88    |  |                                        |  |             |         |
| 7                                              | 0.480                   | 88    |  | Stack Area sq.in.                      |  | 1134.114965 |         |
| 8                                              | 0.450                   | 87    |  |                                        |  |             |         |
| B-1                                            | 0.230                   | 87    |  | Pbar                                   |  | 29.70       |         |
| 2                                              | 0.270                   | 89    |  |                                        |  |             |         |
| 3                                              | 0.320                   | 91    |  | Static Pressure                        |  | -0.4        |         |
| 4                                              | 0.520                   | 91    |  |                                        |  |             |         |
| 5                                              | 0.610                   | 90    |  | Pitot Coef.                            |  | 0.84        |         |
| 6                                              | 0.650                   | 90    |  |                                        |  |             |         |
| 7                                              | 0.680                   | 89    |  | Start Time                             |  | 1045        |         |
| 8                                              | 0.660                   | 89    |  |                                        |  |             |         |
| 0                                              |                         |       |  | Stop Time                              |  | 1052        |         |
| 0                                              |                         |       |  |                                        |  |             |         |
| 0                                              |                         |       |  | Absolute Gas Pressure inches water     |  | Ps =        | 29.67   |
| 0                                              |                         |       |  |                                        |  |             |         |
| 0                                              |                         |       |  | Dry Mole Fraction of Gas               |  | Mfd =       | 0.97112 |
| 0                                              |                         |       |  |                                        |  |             |         |
| 0                                              |                         |       |  | Dry Molecular Weight of Gas lb/lb Mole |  | Md =        | 28.84   |
| 0                                              |                         |       |  |                                        |  |             |         |
| 0                                              |                         |       |  | Wet Molecular Weight of Gas lb/lb Mole |  | Ms =        | 28.52   |
| 0                                              |                         |       |  |                                        |  |             |         |
| 0                                              |                         |       |  | Average Gas Velocity ft/sec            |  | vs =        | 40.17   |
| 0                                              |                         |       |  |                                        |  |             |         |
| 0                                              |                         |       |  | Dry Volumetric Gas Flow Rate           |  |             |         |
| 0                                              |                         |       |  | at Standard Conditions SCFM            |  | Qsd =       | 17591   |
| 0                                              |                         |       |  |                                        |  |             |         |
| 0                                              |                         |       |  | Wet Volumetric Flue Gas Flow Rate      |  |             |         |
| 0                                              |                         |       |  | at Stack Conditions ACFM               |  | Qaw =       | 18980   |
| 0                                              |                         |       |  |                                        |  |             |         |
| 0                                              |                         |       |  | Wet Volumetric Gas Flow Rate           |  |             |         |
| 0                                              |                         |       |  | at Standard Conditions WSCFH           |  | WSCFH =     | 1086846 |
| 0                                              |                         |       |  |                                        |  |             |         |
| 0                                              |                         |       |  | LKCH                                   |  |             |         |
| 0                                              |                         |       |  | Pre                                    |  | 3-4         | good    |
| 0                                              |                         |       |  | Post                                   |  | 5-3         | good    |
| 0                                              |                         |       |  |                                        |  |             |         |
| 0                                              |                         |       |  |                                        |  |             |         |

|                                                |                         |       |  |                                        |  |            |         |
|------------------------------------------------|-------------------------|-------|--|----------------------------------------|--|------------|---------|
| Air Control Techniques EPA Method 2 Data Sheet |                         |       |  | ACT Job Number                         |  | 1909       |         |
| Client                                         | Enviva                  |       |  | ACT Run Number                         |  | 12         |         |
| Plant                                          | Amory                   |       |  | Date                                   |  | 10/16/2013 |         |
| City/State                                     | Amory, MS               |       |  | Gauge ID                               |  | 909033     |         |
| Location                                       | Dry Hammermill Baghouse |       |  | Pitot ID                               |  | 4Pext      |         |
| Averages                                       | 0.500                   | 93.8  |  | Thermocouple ID                        |  | TC25       |         |
|                                                | Delta P                 | Temp  |  |                                        |  |            |         |
| Point No.                                      | In Water                | Deg F |  |                                        |  |            |         |
| A-1                                            | 0.560                   | 91    |  | Oxygen %                               |  | 20.9       |         |
| 2                                              | 0.600                   | 93    |  |                                        |  |            |         |
| 3                                              | 0.600                   | 94    |  | Carbon Dioxide %                       |  | 0          |         |
| 4                                              | 0.610                   | 95    |  |                                        |  |            |         |
| 5                                              | 0.550                   | 95    |  | Moisture %                             |  | 3.40       |         |
| 6                                              | 0.480                   | 95    |  |                                        |  |            |         |
| 7                                              | 0.410                   | 94    |  | Stack Area sq.in.                      |  | 0          |         |
| 8                                              | 0.320                   | 87    |  |                                        |  |            |         |
| B-1                                            | 0.280                   | 91    |  | Pbar                                   |  | 29.70      |         |
| 2                                              | 0.310                   | 94    |  |                                        |  |            |         |
| 3                                              | 0.330                   | 95    |  | Static Pressure                        |  | -0.4       |         |
| 4                                              | 0.430                   | 95    |  |                                        |  |            |         |
| 5                                              | 0.520                   | 95    |  | Pitot Coef.                            |  | 0.84       |         |
| 6                                              | 0.680                   | 95    |  |                                        |  |            |         |
| 7                                              | 0.740                   | 95    |  | Start Time                             |  | 1155       |         |
| 8                                              | 0.760                   | 96    |  |                                        |  |            |         |
| 0                                              |                         |       |  | Stop Time                              |  | 1204       |         |
| 0                                              |                         |       |  |                                        |  |            |         |
| 0                                              |                         |       |  | Absolute Gas Pressure inches water     |  | Ps =       | 29.67   |
| 0                                              |                         |       |  |                                        |  |            |         |
| 0                                              |                         |       |  | Dry Mole Fraction of Gas               |  | Mfd =      | 0.96601 |
| 0                                              |                         |       |  |                                        |  |            |         |
| 0                                              |                         |       |  | Dry Molecular Weight of Gas lb/lb Mole |  | Md =       | 28.84   |
| 0                                              |                         |       |  |                                        |  |            |         |
| 0                                              |                         |       |  | Wet Molecular Weight of Gas lb/lb Mole |  | Ms =       | 28.47   |
| 0                                              |                         |       |  |                                        |  |            |         |
| 0                                              |                         |       |  | Average Gas Velocity ft/sec            |  | vs =       | 41.11   |
| 0                                              |                         |       |  |                                        |  |            |         |
| 0                                              |                         |       |  | Dry Volumetric Gas Flow Rate           |  |            |         |
| 0                                              |                         |       |  | at Standard Conditions SCFM            |  | Qsd =      | 0       |
| 0                                              |                         |       |  |                                        |  |            |         |
| 0                                              |                         |       |  | Wet Volumetric Flue Gas Flow Rate      |  |            |         |
| 0                                              |                         |       |  | at Stack Conditions ACFM               |  | Qaw =      | 0       |
| 0                                              |                         |       |  |                                        |  |            |         |
| 0                                              |                         |       |  | Wet Volumetric Gas Flow Rate           |  |            |         |
| 0                                              |                         |       |  | at Standard Conditions WSCFH           |  | WSCFH =    | 0       |
| 0                                              |                         |       |  |                                        |  |            |         |
| 0                                              |                         |       |  | LKCH                                   |  |            |         |
| 0                                              |                         |       |  | Pre                                    |  | 3-4        | good    |
| 0                                              |                         |       |  | Post                                   |  | 5-3        | good    |
| 0                                              |                         |       |  |                                        |  |            |         |
| 0                                              |                         |       |  |                                        |  |            |         |



|                                                |                         |       |  |                                                            |  |             |         |
|------------------------------------------------|-------------------------|-------|--|------------------------------------------------------------|--|-------------|---------|
| Air Control Techniques EPA Method 2 Data Sheet |                         |       |  | ACT Job Number                                             |  | 1909        |         |
| Client                                         | Enviva                  |       |  | ACT Run Number                                             |  | 13          |         |
| Plant                                          | Amory                   |       |  | Date                                                       |  | 10/16/2013  |         |
| City/State                                     | Amory, MS               |       |  | Gauge ID                                                   |  | 909033      |         |
| Location                                       | Dry Hammermill Baghouse |       |  | Pitot ID                                                   |  | 4Pext       |         |
| Averages                                       | 0.491                   | 96.1  |  | Thermocouple ID                                            |  | TC25        |         |
|                                                | Delta P                 | Temp  |  |                                                            |  |             |         |
| Point No.                                      | In Water                | Deg F |  |                                                            |  |             |         |
| A-1                                            | 0.520                   | 95    |  | Oxygen %                                                   |  | 20.9        |         |
| 2                                              | 0.490                   | 96    |  | Carbon Dioxide %                                           |  | 0           |         |
| 3                                              | 0.480                   | 96    |  | Moisture %                                                 |  | 4.25        |         |
| 4                                              | 0.440                   | 97    |  | Stack Area sq.in.                                          |  | 1134.114965 |         |
| 5                                              | 0.480                   | 97    |  | Pbar                                                       |  | 29.70       |         |
| 6                                              | 0.440                   | 97    |  | Static Pressure                                            |  | -0.4        |         |
| 7                                              | 0.380                   | 94    |  | Pitot Coef.                                                |  | 0.84        |         |
| 8                                              | 0.440                   | 97    |  | Start Time                                                 |  | 1310        |         |
| 0                                              | 0.633                   | 91    |  | Stop Time                                                  |  |             |         |
| B-1                                            | 0.340                   | 93    |  | Absolute Gas Pressure inches water                         |  | Ps =        | 29.67   |
| 2                                              | 0.380                   | 95    |  | Dry Mole Fraction of Gas                                   |  | Mfd =       | 0.95754 |
| 3                                              | 0.390                   | 97    |  | Dry Molecular Weight of Gas lb/lb Mole                     |  | Md =        | 28.84   |
| 4                                              | 0.420                   | 97    |  | Wet Molecular Weight of Gas lb/lb Mole                     |  | Ms =        | 28.38   |
| 5                                              | 0.570                   | 98    |  | Average Gas Velocity ft/sec                                |  | vs =        | 40.89   |
| 6                                              | 0.660                   | 98    |  | Dry Volumetric Gas Flow Rate at Standard Conditions SCFM   |  | Qsd =       | 17421   |
| 7                                              | 0.680                   | 98    |  | Wet Volumetric Flue Gas Flow Rate at Stack Conditions ACFM |  | Qaw =       | 19321   |
| 8                                              | 0.640                   | 98    |  | Wet Volumetric Gas Flow Rate at Standard Conditions WSCFH  |  | WSCFH =     | 1091591 |
| 0                                              |                         |       |  | LKCH                                                       |  |             |         |
| 0                                              |                         |       |  | Pre                                                        |  | 3-4         | good    |
| 0                                              |                         |       |  | Post                                                       |  | 5-3         | good    |
| 0                                              |                         |       |  |                                                            |  |             |         |
| 0                                              |                         |       |  |                                                            |  |             |         |

**Method 1 - Air Control Techniques, P.C.**

Date

10/14/2013

Client Enviva  
Job # 1909  
Plant Name Amory  
State Mississippi  
City Amory  
Sampling Location Pellet Mill 2 Cooler

No. of Ports Available 2  
No. of Ports Used 2  
Port Inside Diameter, Inches 2  
Distance From Far Wall To Outside Of Port, Inches 24  
Nipple Length And/Or Wall Thickness, Inches 0  
Depth Of Stack Or Duct, Inches 24  
Stack Or Duct Width (if rectangular), Inches  
Equiv. Diameter = 2DW/(D+W), Inches 24  
Stack/Duct Area, Square Feet 3.1  
(□ x R<sup>2</sup> or L x W)

Upstream Downstream  
Distance to Flow Disturbances, Inches 70 30  
Diameters 2.92 1.25

2 diff nipples probe marked to inside of port

**Point Location Data**

| Point | % of Duct<br>Depth | Distance From<br>Inside Wall | Distance From<br>Outside of Port |
|-------|--------------------|------------------------------|----------------------------------|
| 1     | 3.2                | 6/8                          | 6/8                              |
| 2     | 10.6               | 2 4/8                        | 2 4/8                            |
| 3     | 19.4               | 4 5/8                        | 4 5/8                            |
| 4     | 32.3               | 7 6/8                        | 7 6/8                            |
| 5     | 67.7               | 16 2/8                       | 16 2/8                           |
| 6     | 80.6               | 19 3/8                       | 19 3/8                           |
| 7     | 89.5               | 21 4/8                       | 21 4/8                           |
| 8     | 96.8               | 23 2/8                       | 23 2/8                           |
| 9     |                    |                              |                                  |
| 10    |                    |                              |                                  |
| 11    |                    |                              |                                  |
| 12    |                    |                              |                                  |
| 13    |                    |                              |                                  |
| 14    |                    |                              |                                  |
| 15    |                    |                              |                                  |
| 16    |                    |                              |                                  |
| 17    |                    |                              |                                  |
| 18    |                    |                              |                                  |
| 19    |                    |                              |                                  |
| 20    |                    |                              |                                  |
| 21    |                    |                              |                                  |
| 22    |                    |                              |                                  |
| 23    |                    |                              |                                  |
| 24    |                    |                              |                                  |
| 25    |                    |                              |                                  |

Too Close

1

23

Note: If more than 8 and 2 diameters and if duct dia.  
is less than 24" use 8 or 9 points.

| Velocity | UP | Down | Particulate |
|----------|----|------|-------------|
| 12       | 8  | 2    | 12          |
| 12       | 7  | 1.75 | 12          |
| 12       | 6  | 1.5  | 16          |
| 16       | 5  | 1.25 | 20          |
| 16       | 2  | 0.5  | 24 or 25    |

**Location of Points in Circular Stacks or Ducts**

|    | 4    | 6    | 8    | 10   | 12   | 14   | 16   | 18   | 20   | 22   | 24   |
|----|------|------|------|------|------|------|------|------|------|------|------|
| 1  | 6.7  | 4.4  | 3.2  | 2.6  | 2.1  | 1.8  | 1.6  | 1.4  | 1.3  | 1.1  | 1.1  |
| 2  | 25.0 | 14.6 | 10.6 | 8.2  | 6.7  | 5.7  | 4.9  | 4.4  | 3.9  | 3.5  | 3.2  |
| 3  | 75.0 | 29.6 | 19.4 | 14.6 | 11.8 | 9.9  | 8.5  | 7.5  | 6.7  | 6.0  | 5.5  |
| 4  | 93.3 | 70.4 | 32.3 | 22.6 | 17.7 | 14.6 | 12.5 | 10.9 | 9.7  | 8.7  | 7.9  |
| 5  |      | 85.4 | 67.7 | 34.2 | 25.0 | 20.1 | 16.9 | 14.6 | 12.9 | 11.6 | 10.5 |
| 6  |      | 95.6 | 80.6 | 65.8 | 35.6 | 26.9 | 22.0 | 18.8 | 16.5 | 14.6 | 13.2 |
| 7  |      |      | 89.5 | 77.4 | 64.4 | 36.6 | 28.3 | 23.6 | 20.4 | 18.0 | 16.1 |
| 8  |      |      | 96.8 | 85.4 | 75.0 | 63.4 | 37.5 | 29.6 | 25.0 | 21.8 | 19.4 |
| 9  |      |      |      | 91.8 | 82.3 | 73.1 | 62.5 | 38.2 | 30.6 | 26.2 | 23.0 |
| 10 |      |      |      | 97.4 | 88.2 | 79.9 | 71.7 | 61.8 | 38.8 | 31.5 | 27.2 |
| 11 |      |      |      |      | 93.3 | 85.4 | 78.0 | 70.4 | 61.2 | 39.3 | 32.3 |
| 12 |      |      |      |      | 97.9 | 90.1 | 83.1 | 76.4 | 69.4 | 60.7 | 39.6 |
| 13 |      |      |      |      |      | 94.3 | 87.6 | 81.2 | 75.0 | 68.5 | 60.2 |
| 14 |      |      |      |      |      | 98.2 | 91.5 | 85.4 | 79.6 | 73.8 | 67.7 |
| 15 |      |      |      |      |      |      | 95.1 | 89.1 | 83.5 | 78.2 | 72.8 |
| 16 |      |      |      |      |      |      | 98.4 | 92.5 | 87.1 | 82.0 | 77.0 |
| 17 |      |      |      |      |      |      |      | 95.6 | 90.3 | 85.4 | 80.6 |
| 18 |      |      |      |      |      |      |      | 98.6 | 93.3 | 88.4 | 83.9 |
| 19 |      |      |      |      |      |      |      |      | 96.1 | 91.3 | 86.8 |
| 20 |      |      |      |      |      |      |      |      | 98.7 | 94.0 | 89.5 |
| 21 |      |      |      |      |      |      |      |      |      | 96.5 | 92.1 |
| 22 |      |      |      |      |      |      |      |      |      | 98.9 | 94.5 |
| 23 |      |      |      |      |      |      |      |      |      |      | 96.8 |
| 24 |      |      |      |      |      |      |      |      |      |      | 98.9 |

**Location of Points in Rectangular Stacks or Ducts**

|    | 2  | 3    | 4    | 5    | 6    | 7    | 8    | 9    | 10   | 11   | 12   |
|----|----|------|------|------|------|------|------|------|------|------|------|
| 1  | 25 | 16.7 | 12.5 | 10.0 | 8.3  | 7.1  | 6.3  | 5.6  | 5.0  | 4.5  | 4.2  |
| 2  | 75 | 50   | 37.5 | 30.0 | 25   | 21.4 | 18.8 | 16.7 | 15.0 | 13.6 | 12.5 |
| 3  |    | 83.3 | 62.5 | 50.0 | 41.7 | 35.7 | 31.3 | 27.8 | 25.0 | 22.7 | 20.8 |
| 4  |    |      | 87.5 | 70.0 | 58.3 | 50   | 43.8 | 28.9 | 35.0 | 31.8 | 29.2 |
| 5  |    |      |      | 90.0 | 75   | 64.3 | 56.3 | 50   | 45.0 | 40.9 | 37.5 |
| 6  |    |      |      |      | 91.7 | 78.6 | 68.8 | 61.1 | 55.0 | 50   | 45.8 |
| 7  |    |      |      |      |      | 92.9 | 81.3 | 72.2 | 65.0 | 59.1 | 54.2 |
| 8  |    |      |      |      |      |      | 93.8 | 83.3 | 75.0 | 68.2 | 62.5 |
| 9  |    |      |      |      |      |      |      | 94.4 | 85.0 | 77.3 | 70.8 |
| 10 |    |      |      |      |      |      |      |      | 95.0 | 86.4 | 79.2 |
| 11 |    |      |      |      |      |      |      |      |      | 95.5 | 87.5 |
| 12 |    |      |      |      |      |      |      |      |      |      | 95.8 |

0.0000 - 0.0625 - 0 0.5625 - 0.6875 - 5/8  
0.0625 - 0.1875 - 1/8 0.6875 - 0.8125 - 3/4  
0.1875 - 0.3125 - 1/4 0.8125 - 0.9375 - 7/8  
0.3125 - 0.4375 - 3/8 0.9375 - 1.0000 - 1  
0.4375 - 0.5625 - 1/2

|                                                |                      |              |              |                                               |                    |                |  |
|------------------------------------------------|----------------------|--------------|--------------|-----------------------------------------------|--------------------|----------------|--|
| Air Control Techniques EPA Method 2 Data Sheet |                      |              |              | ACT Job Number                                |                    | 1909           |  |
| Client                                         | Enviva               |              |              | ACT Run Number                                |                    | 8              |  |
| Plant                                          | Amory                |              |              | Date                                          |                    | 10/15/2013     |  |
| City/State                                     | Amory, MS            |              |              | Gauge ID                                      |                    | 909033         |  |
| Location                                       | Pellet Mill 2 Cooler |              |              | Pitot ID                                      |                    | 4Pext          |  |
|                                                |                      |              |              | Thermocouple ID                               |                    | TC25           |  |
| <b>Averages</b>                                | <b>1.529</b>         | <b>138.9</b> |              |                                               |                    |                |  |
|                                                | <b>Delta P</b>       | <b>Temp</b>  |              |                                               |                    |                |  |
| <b>Point No.</b>                               | <b>In Water</b>      | <b>Deg F</b> | <b>Angle</b> |                                               |                    |                |  |
| <b>A-1</b>                                     | 1.600                | 139          | -5           | <b>Oxygen %</b>                               | <b>20.9</b>        |                |  |
| <b>2</b>                                       | 1.600                | 139          | 0            |                                               |                    |                |  |
| <b>3</b>                                       | 1.500                | 139          | 0            | <b>Carbon Dioxide %</b>                       | <b>0</b>           |                |  |
| <b>4</b>                                       | 1.300                | 139          | 0            |                                               |                    |                |  |
| <b>5</b>                                       | 1.300                | 140          | -10          | <b>Moisture %</b>                             | <b>7.73</b>        |                |  |
| <b>6</b>                                       | 1.600                | 139          | -2           |                                               |                    |                |  |
| <b>7</b>                                       | 1.500                | 135          | -5           | <b>Stack Area sq.in.</b>                      | <b>452.3893488</b> |                |  |
| <b>8</b>                                       | 1.600                | 135          | 0            |                                               |                    |                |  |
| <b>B-1</b>                                     | 1.500                | 137          | 0            | <b>Pbar</b>                                   | <b>29.80</b>       |                |  |
| <b>2</b>                                       | 1.500                | 138          | -5           |                                               |                    |                |  |
| <b>3</b>                                       | 1.400                | 139          | -3           | <b>Static Pressure</b>                        | <b>-13.5</b>       |                |  |
| <b>4</b>                                       | 1.400                | 140          | 4            |                                               |                    |                |  |
| <b>5</b>                                       | 1.700                | 140          | 2            | <b>Pitot Coef.</b>                            | <b>0.84</b>        |                |  |
| <b>6</b>                                       | 1.700                | 141          | 3            |                                               |                    |                |  |
| <b>7</b>                                       | 1.700                | 141          | 6            | <b>Start Time</b>                             | <b>1650</b>        |                |  |
| <b>8</b>                                       | 1.600                | 142          | 5            | <b>Stop Time</b>                              | <b>1702</b>        |                |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>Absolute Gas Pressure inches water</b>     | <b>Ps =</b>        | <b>28.81</b>   |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>Dry Mole Fraction of Gas</b>               | <b>Mfd =</b>       | <b>0.92267</b> |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>Dry Molecular Weight of Gas lb/lb Mole</b> | <b>Md =</b>        | <b>28.84</b>   |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>Wet Molecular Weight of Gas lb/lb Mole</b> | <b>Ms =</b>        | <b>28.00</b>   |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>Average Gas Velocity ft/sec</b>            | <b>vs =</b>        | <b>76.51</b>   |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>Dry Volumetric Gas Flow Rate</b>           |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>at Standard Conditions SCFM</b>            | <b>Qsd =</b>       | <b>11294</b>   |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>Wet Volumetric Flue Gas Flow Rate</b>      |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>at Stack Conditions ACFM</b>               | <b>Qaw =</b>       | <b>14422</b>   |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>Wet Volumetric Gas Flow Rate</b>           |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>at Standard Conditions WSCFH</b>           | <b>WSCFH =</b>     | <b>734451</b>  |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |
| <b>0</b>                                       |                      |              |              | LKCH                                          |                    |                |  |
| <b>0</b>                                       |                      |              |              | Pre                                           | 3-4                | good           |  |
| <b>0</b>                                       |                      |              |              | Post                                          | 5-3                | good           |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |

|                                                |                      |              |              |                                                                   |  |                    |                |
|------------------------------------------------|----------------------|--------------|--------------|-------------------------------------------------------------------|--|--------------------|----------------|
| Air Control Techniques EPA Method 2 Data Sheet |                      |              |              | ACT Job Number                                                    |  | 1909               |                |
| Client                                         | Enviva               |              |              | ACT Run Number                                                    |  | 9                  |                |
| Plant                                          | Amory                |              |              | Date                                                              |  | 10/15/2013         |                |
| City/State                                     | Amory, MS            |              |              | Gauge ID                                                          |  | 909033             |                |
| Location                                       | Pellet Mill 2 Cooler |              |              | Pitot ID                                                          |  | 4Pext              |                |
| <b>Averages</b>                                |                      | <b>1.521</b> | <b>138.3</b> | Thermocouple ID                                                   |  | TC25               |                |
|                                                | <b>Delta P</b>       | <b>Temp</b>  |              |                                                                   |  |                    |                |
| <b>Point No.</b>                               | <b>In Water</b>      | <b>Deg F</b> |              |                                                                   |  |                    |                |
| A-1                                            | 1.600                | 137          |              | <b>Oxygen %</b>                                                   |  | <b>20.9</b>        |                |
| 2                                              | 1.700                | 138          |              | <b>Carbon Dioxide %</b>                                           |  | <b>0</b>           |                |
| 3                                              | 1.500                | 139          |              | <b>Moisture %</b>                                                 |  | <b>8.08</b>        |                |
| 4                                              | 1.400                | 139          |              | <b>Stack Area sq.in.</b>                                          |  | <b>452.3893488</b> |                |
| 5                                              | 1.400                | 138          |              | <b>Pbar</b>                                                       |  | <b>29.80</b>       |                |
| 6                                              | 1.700                | 136          |              | <b>Static Pressure</b>                                            |  | <b>-13.5</b>       |                |
| 7                                              | 1.700                | 137          |              | <b>Pitot Coef.</b>                                                |  | <b>0.84</b>        |                |
| 8                                              | 1.600                | 138          |              | <b>Start Time</b>                                                 |  | <b>1839</b>        |                |
| B-1                                            | 1.700                | 137          |              | <b>Stop Time</b>                                                  |  | <b>1843</b>        |                |
| 2                                              | 1.800                | 138          |              |                                                                   |  |                    |                |
| 3                                              | 1.500                | 139          |              |                                                                   |  |                    |                |
| 4                                              | 1.300                | 138          |              |                                                                   |  |                    |                |
| 5                                              | 1.300                | 139          |              |                                                                   |  |                    |                |
| 6                                              | 1.500                | 140          |              |                                                                   |  |                    |                |
| 7                                              | 1.400                | 140          |              |                                                                   |  |                    |                |
| 8                                              | 1.300                | 140          |              |                                                                   |  |                    |                |
| 0                                              |                      |              |              |                                                                   |  |                    |                |
| 0                                              |                      |              |              |                                                                   |  |                    |                |
| 0                                              |                      |              |              | <b>Absolute Gas Pressure inches water</b>                         |  | <b>Ps =</b>        | <b>28.81</b>   |
| 0                                              |                      |              |              | <b>Dry Mole Fraction of Gas</b>                                   |  | <b>Mfd =</b>       | <b>0.91917</b> |
| 0                                              |                      |              |              | <b>Dry Molecular Weight of Gas lb/lb Mole</b>                     |  | <b>Md =</b>        | <b>28.84</b>   |
| 0                                              |                      |              |              | <b>Wet Molecular Weight of Gas lb/lb Mole</b>                     |  | <b>Ms =</b>        | <b>27.96</b>   |
| 0                                              |                      |              |              | <b>Average Gas Velocity ft/sec</b>                                |  | <b>vs =</b>        | <b>76.33</b>   |
| 0                                              |                      |              |              | <b>Dry Volumetric Gas Flow Rate at Standard Conditions SCFM</b>   |  | <b>Qsd =</b>       | <b>11236</b>   |
| 0                                              |                      |              |              | <b>Wet Volumetric Flue Gas Flow Rate at Stack Conditions ACFM</b> |  | <b>Qaw =</b>       | <b>14387</b>   |
| 0                                              |                      |              |              | <b>Wet Volumetric Gas Flow Rate at Standard Conditions WSCFH</b>  |  | <b>WSCFH =</b>     | <b>733451</b>  |
| 0                                              |                      |              |              |                                                                   |  |                    |                |
| 0                                              |                      |              |              | LKCH                                                              |  |                    |                |
| 0                                              |                      |              |              | Pre                                                               |  | 3-4                | good           |
| 0                                              |                      |              |              | Post                                                              |  | 5-3                | good           |
| 0                                              |                      |              |              |                                                                   |  |                    |                |
| 0                                              |                      |              |              |                                                                   |  |                    |                |

|                                                |                      |              |              |                                               |                    |                |  |
|------------------------------------------------|----------------------|--------------|--------------|-----------------------------------------------|--------------------|----------------|--|
| Air Control Techniques EPA Method 2 Data Sheet |                      |              |              | ACT Job Number                                |                    | 1909           |  |
| Client                                         | Enviva               |              |              | ACT Run Number                                |                    | 10             |  |
| Plant                                          | Amory                |              |              | Date                                          |                    | 10/15/2013     |  |
| City/State                                     | Amory, MS            |              |              | Gauge ID                                      |                    | 909033         |  |
| Location                                       | Pellet Mill 2 Cooler |              |              | Pitot ID                                      |                    | 4Pext          |  |
| <b>Averages</b>                                |                      | <b>1.539</b> | <b>138.6</b> | Thermocouple ID                               |                    | TC25           |  |
|                                                | <b>Delta P</b>       | <b>Temp</b>  |              |                                               |                    |                |  |
| <b>Point No.</b>                               | <b>In Water</b>      | <b>Deg F</b> |              |                                               |                    |                |  |
| <b>A-1</b>                                     | 1.700                | 137          |              | <b>Oxygen %</b>                               | <b>20.9</b>        |                |  |
| <b>2</b>                                       | 1.700                | 138          |              |                                               |                    |                |  |
| <b>3</b>                                       | 1.600                | 139          |              | <b>Carbon Dioxide %</b>                       | <b>0</b>           |                |  |
| <b>4</b>                                       | 1.400                | 140          |              |                                               |                    |                |  |
| <b>5</b>                                       | 1.400                | 138          |              | <b>Moisture %</b>                             | <b>8.08</b>        |                |  |
| <b>6</b>                                       | 1.600                | 137          |              |                                               |                    |                |  |
| <b>7</b>                                       | 2.100                | 136          |              | <b>Stack Area sq.in.</b>                      | <b>452.3893488</b> |                |  |
| <b>8</b>                                       | 1.800                | 135          |              |                                               |                    |                |  |
| <b>B-1</b>                                     | 1.800                | 137          |              | <b>Pbar</b>                                   | <b>29.80</b>       |                |  |
| <b>2</b>                                       | 1.900                | 138          |              |                                               |                    |                |  |
| <b>3</b>                                       | 1.400                | 139          |              | <b>Static Pressure</b>                        | <b>-13.5</b>       |                |  |
| <b>4</b>                                       | 1.100                | 140          |              |                                               |                    |                |  |
| <b>5</b>                                       | 1.300                | 140          |              | <b>Pitot Coef.</b>                            | <b>0.84</b>        |                |  |
| <b>6</b>                                       | 1.400                | 141          |              |                                               |                    |                |  |
| <b>7</b>                                       | 1.300                | 141          |              | <b>Start Time</b>                             | <b>1952</b>        |                |  |
| <b>8</b>                                       | 1.300                | 141          |              |                                               |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>Stop Time</b>                              | <b>1956</b>        |                |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>Absolute Gas Pressure inches water</b>     | <b>Ps =</b>        | <b>28.81</b>   |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>Dry Mole Fraction of Gas</b>               | <b>Mfd =</b>       | <b>0.91917</b> |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>Dry Molecular Weight of Gas lb/lb Mole</b> | <b>Md =</b>        | <b>28.84</b>   |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>Wet Molecular Weight of Gas lb/lb Mole</b> | <b>Ms =</b>        | <b>27.96</b>   |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>Average Gas Velocity ft/sec</b>            | <b>vs =</b>        | <b>76.80</b>   |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>Dry Volumetric Gas Flow Rate</b>           |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>at Standard Conditions SCFM</b>            | <b>Qsd =</b>       | <b>11302</b>   |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>Wet Volumetric Flue Gas Flow Rate</b>      |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>at Stack Conditions ACFM</b>               | <b>Qaw =</b>       | <b>14477</b>   |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>Wet Volumetric Gas Flow Rate</b>           |                    |                |  |
| <b>0</b>                                       |                      |              |              | <b>at Standard Conditions WSCFH</b>           | <b>WSCFH =</b>     | <b>737732</b>  |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |
| <b>0</b>                                       |                      |              |              | LKCH                                          |                    |                |  |
| <b>0</b>                                       |                      |              |              | Pre                                           | 3-4                | good           |  |
| <b>0</b>                                       |                      |              |              | Post                                          | 5-3                | good           |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |
| <b>0</b>                                       |                      |              |              |                                               |                    |                |  |

# Method 1 - Air Control Techniques, P.C.

Date

10/14/2013

Client Enviva  
Job # 1909  
Plant Name Amory  
State Mississippi  
City Amory  
Sampling Location Green Hammermill

No. of Ports Available 2  
No. of Ports Used 2  
Port Inside Diameter, Inches 2  
Distance From Far Wall To Outside Of Port, Inches 18  
Nipple Length And/Or Wall Thickness, Inches 0  
Depth Of Stack Or Duct, Inches 18  
Stack Or Duct Width (if rectangular), Inches  
Equiv. Diameter = 2DW/(D+W), Inches 18  
Stack/Duct Area, Square feet 1.8  
(□ x R<sup>2</sup> or L x W)  
Upstream Downstream  
Distance to Flow Disturbances, inches 37.5 11.5  
Diameters 2.08 0.64

## Point Location Data

| Point | % of Duct<br>Depth | Distance From<br>Inside Wall | Distance From<br>Outside of Port |
|-------|--------------------|------------------------------|----------------------------------|
| 1     | 3.2                | 5/8                          | 5/8                              |
| 2     | 10.6               | 1 7/8                        | 1 7/8                            |
| 3     | 19.4               | 3 4/8                        | 3 4/8                            |
| 4     | 32.3               | 5 7/8                        | 5 7/8                            |
| 5     | 67.7               | 12 1/8                       | 12 1/8                           |
| 6     | 80.6               | 14 4/8                       | 14 4/8                           |
| 7     | 89.5               | 16 1/8                       | 16 1/8                           |
| 8     | 96.8               | 17 3/8                       | 17 3/8                           |
| 9     |                    |                              |                                  |
| 10    |                    |                              |                                  |
| 11    |                    |                              |                                  |
| 12    |                    |                              |                                  |
| 13    |                    |                              |                                  |
| 14    |                    |                              |                                  |
| 15    |                    |                              |                                  |
| 16    |                    |                              |                                  |
| 17    |                    |                              |                                  |
| 18    |                    |                              |                                  |
| 19    |                    |                              |                                  |
| 20    |                    |                              |                                  |
| 21    |                    |                              |                                  |
| 22    |                    |                              |                                  |
| 23    |                    |                              |                                  |
| 24    |                    |                              |                                  |
| 25    |                    |                              |                                  |

Too Close

1

17

Note: If more than 8 and 2 diameters and if duct dia.  
is less than 24" use 8 or 9 points.

| Velocity | UP | Down | Particulate |
|----------|----|------|-------------|
| 12       | 8  | 2    | 12          |
| 12       | 7  | 1.75 | 12          |
| 12       | 6  | 1.5  | 16          |
| 16       | 5  | 1.25 | 20          |
| 16       | 2  | 0.5  | 24 or 25    |

## Location of Points in Circular Stacks or Ducts

|    | 4    | 6    | 8    | 10   | 12   | 14   | 16   | 18   | 20   | 22   | 24   |
|----|------|------|------|------|------|------|------|------|------|------|------|
| 1  | 6.7  | 4.4  | 3.2  | 2.6  | 2.1  | 1.8  | 1.6  | 1.4  | 1.3  | 1.1  | 1.1  |
| 2  | 25.0 | 14.6 | 10.6 | 8.2  | 6.7  | 5.7  | 4.9  | 4.4  | 3.9  | 3.5  | 3.2  |
| 3  | 75.0 | 29.6 | 19.4 | 14.6 | 11.8 | 9.9  | 8.5  | 7.5  | 6.7  | 6.0  | 5.5  |
| 4  | 93.3 | 70.4 | 32.3 | 22.6 | 17.7 | 14.6 | 12.5 | 10.9 | 9.7  | 8.7  | 7.9  |
| 5  |      | 85.4 | 67.7 | 34.2 | 25.0 | 20.1 | 16.9 | 14.6 | 12.9 | 11.6 | 10.5 |
| 6  |      | 95.6 | 80.6 | 65.8 | 35.6 | 26.9 | 22.0 | 18.8 | 16.5 | 14.6 | 13.2 |
| 7  |      |      | 89.5 | 77.4 | 64.4 | 36.6 | 28.3 | 23.6 | 20.4 | 18.0 | 16.1 |
| 8  |      |      | 96.8 | 85.4 | 75.0 | 63.4 | 37.5 | 29.6 | 25.0 | 21.8 | 19.4 |
| 9  |      |      |      | 91.8 | 82.3 | 73.1 | 62.5 | 38.2 | 30.6 | 26.2 | 23.0 |
| 10 |      |      |      | 97.4 | 88.2 | 79.9 | 71.7 | 61.8 | 38.8 | 31.5 | 27.2 |
| 11 |      |      |      |      | 93.3 | 85.4 | 78.0 | 70.4 | 61.2 | 39.3 | 32.3 |
| 12 |      |      |      |      | 97.9 | 90.1 | 83.1 | 76.4 | 69.4 | 60.7 | 39.6 |
| 13 |      |      |      |      |      | 94.3 | 87.6 | 81.2 | 75.0 | 68.5 | 60.2 |
| 14 |      |      |      |      |      | 98.2 | 91.5 | 85.4 | 79.6 | 73.8 | 67.7 |
| 15 |      |      |      |      |      |      | 95.1 | 89.1 | 83.5 | 78.2 | 72.8 |
| 16 |      |      |      |      |      |      | 98.4 | 92.5 | 87.1 | 82.0 | 77.0 |
| 17 |      |      |      |      |      |      |      | 95.6 | 90.3 | 85.4 | 80.6 |
| 18 |      |      |      |      |      |      |      | 98.6 | 93.3 | 88.4 | 83.9 |
| 19 |      |      |      |      |      |      |      |      | 96.1 | 91.3 | 86.8 |
| 20 |      |      |      |      |      |      |      |      | 98.7 | 94.0 | 89.5 |
| 21 |      |      |      |      |      |      |      |      |      | 96.5 | 92.1 |
| 22 |      |      |      |      |      |      |      |      |      | 98.9 | 94.5 |
| 23 |      |      |      |      |      |      |      |      |      |      | 96.8 |
| 24 |      |      |      |      |      |      |      |      |      |      | 98.9 |

## Location of Points in Rectangular Stacks or Ducts

|    | 2  | 3    | 4    | 5    | 6    | 7    | 8    | 9    | 10   | 11   | 12   |
|----|----|------|------|------|------|------|------|------|------|------|------|
| 1  | 25 | 16.7 | 12.5 | 10.0 | 8.3  | 7.1  | 6.3  | 5.6  | 5.0  | 4.5  | 4.2  |
| 2  | 75 | 50   | 37.5 | 30.0 | 25   | 21.4 | 18.8 | 16.7 | 15.0 | 13.6 | 12.5 |
| 3  |    | 83.3 | 62.5 | 50.0 | 41.7 | 35.7 | 31.3 | 27.8 | 25.0 | 22.7 | 20.8 |
| 4  |    |      | 87.5 | 70.0 | 58.3 | 50   | 43.8 | 28.9 | 35.0 | 31.8 | 29.2 |
| 5  |    |      |      | 90.0 | 75   | 64.3 | 56.3 | 50   | 45.0 | 40.9 | 37.5 |
| 6  |    |      |      |      | 91.7 | 78.6 | 68.8 | 61.1 | 55.0 | 50   | 45.8 |
| 7  |    |      |      |      |      | 92.9 | 81.3 | 72.2 | 65.0 | 59.1 | 54.2 |
| 8  |    |      |      |      |      |      | 93.8 | 83.3 | 75.0 | 68.2 | 62.5 |
| 9  |    |      |      |      |      |      |      | 94.4 | 85.0 | 77.3 | 70.8 |
| 10 |    |      |      |      |      |      |      |      | 95.0 | 86.4 | 79.2 |
| 11 |    |      |      |      |      |      |      |      |      | 95.5 | 87.5 |
| 12 |    |      |      |      |      |      |      |      |      |      | 95.8 |

0.0000 - 0.0625 - 0 0.5625 - 0.6875 - 5/8  
0.0625 - 0.1875 - 1/8 0.6875 - 0.8125 - 3/4  
0.1875 - 0.3125 - 1/4 0.8125 - 0.9375 - 7/8  
0.3125 - 0.4375 - 3/8 0.9375 - 1.0000 - 1  
0.4375 - 0.5625 - 1/2

|                                                |                  |       |       |                                        |         |             |  |
|------------------------------------------------|------------------|-------|-------|----------------------------------------|---------|-------------|--|
| Air Control Techniques EPA Method 2 Data Sheet |                  |       |       | ACT Job Number                         |         | 1909        |  |
| Client                                         | Enviva           |       |       | ACT Run Number                         |         | 4           |  |
| Plant                                          | Amory            |       |       | Date                                   |         | 10/15/2013  |  |
| City/State                                     | Amory, MS        |       |       | Gauge ID                               |         | 909033      |  |
| Location                                       | Green Hammermill |       |       | Pitot ID                               |         | 4Pext       |  |
| Averages                                       |                  |       |       | Thermocouple ID                        |         | TC25        |  |
|                                                | Delta P          | Temp  |       |                                        |         |             |  |
| Point No.                                      | In Water         | Deg F | Angle |                                        |         |             |  |
| A-1                                            | 3.700            | 86    | 2     | Oxygen %                               |         | 20.9        |  |
| 2                                              | 4.300            | 88    | 5     |                                        |         |             |  |
| 3                                              | 5.300            | 88    | -3    | Carbon Dioxide %                       |         | 0           |  |
| 4                                              | 5.500            | 89    | -3    |                                        |         |             |  |
| 5                                              | 2.700            | 88    | 0     | Moisture %                             |         | 2.25        |  |
| 6                                              | 2.500            | 87    | 0     |                                        |         |             |  |
| 7                                              | 2.600            | 86    | 3     | Stack Area sq.in.                      |         | 254.4690087 |  |
| 8                                              | 2.200            | 84    | 5     |                                        |         |             |  |
| B-1                                            | 2.100            | 86    | 2     | Pbar                                   |         | 29.80       |  |
| 2                                              | 2.200            | 88    | 4     |                                        |         |             |  |
| 3                                              | 2.500            | 88    | 5     | Static Pressure                        |         | 3.6         |  |
| 4                                              | 6.500            | 88    | -3    |                                        |         |             |  |
| 5                                              | 6.500            | 89    | -3    | Pitot Coef.                            |         | 0.84        |  |
| 6                                              | 6.300            | 88    | 0     |                                        |         |             |  |
| 7                                              | 5.900            | 88    | 1     | Start Time                             |         | 855         |  |
| 8                                              | 7.900            | 88    | 2     |                                        |         |             |  |
| 0                                              |                  |       |       | Stop Time                              |         | 902         |  |
| 0                                              |                  |       |       |                                        |         |             |  |
| 0                                              |                  |       |       | Absolute Gas Pressure inches water     | Ps =    | 30.06       |  |
| 0                                              |                  |       |       |                                        |         |             |  |
| 0                                              |                  |       |       | Dry Mole Fraction of Gas               | Mfd =   | 0.97746     |  |
| 0                                              |                  |       |       |                                        |         |             |  |
| 0                                              |                  |       |       | Dry Molecular Weight of Gas lb/lb Mole | Md =    | 28.84       |  |
| 0                                              |                  |       |       |                                        |         |             |  |
| 0                                              |                  |       |       | Wet Molecular Weight of Gas lb/lb Mole | Ms =    | 28.59       |  |
| 0                                              |                  |       |       |                                        |         |             |  |
| 0                                              |                  |       |       | Average Gas Velocity ft/sec            | vs =    | 115.79      |  |
| 0                                              |                  |       |       |                                        |         |             |  |
| 0                                              |                  |       |       | Dry Volumetric Gas Flow Rate           |         |             |  |
| 0                                              |                  |       |       | at Standard Conditions SCFM            | Qsd =   | 11630       |  |
| 0                                              |                  |       |       |                                        |         |             |  |
| 0                                              |                  |       |       | Wet Volumetric Flue Gas Flow Rate      |         |             |  |
| 0                                              |                  |       |       | at Stack Conditions ACFM               | Qaw =   | 12277       |  |
| 0                                              |                  |       |       |                                        |         |             |  |
| 0                                              |                  |       |       | Wet Volumetric Gas Flow Rate           |         |             |  |
| 0                                              |                  |       |       | at Standard Conditions WSCFH           | WSCFH = | 713880      |  |
| 0                                              |                  |       |       |                                        |         |             |  |
| 0                                              |                  |       |       | LKCH                                   |         |             |  |
| 0                                              |                  |       |       | Pre                                    | 3-4     | good        |  |
| 0                                              |                  |       |       | Post                                   | 5-3     | good        |  |
| 0                                              |                  |       |       |                                        |         |             |  |
| 0                                              |                  |       |       |                                        |         |             |  |

|                                                |                  |              |  |                                               |  |                    |                |
|------------------------------------------------|------------------|--------------|--|-----------------------------------------------|--|--------------------|----------------|
| Air Control Techniques EPA Method 2 Data Sheet |                  |              |  | ACT Job Number                                |  | 1909               |                |
| Client                                         | Enviva           |              |  | ACT Run Number                                |  | 5                  |                |
| Plant                                          | Amory            |              |  | Date                                          |  | 10/15/2013         |                |
| City/State                                     | Amory, MS        |              |  | Gauge ID                                      |  | 909033             |                |
| Location                                       | Green Hammermill |              |  | Pitot ID                                      |  | 4Pext              |                |
| <b>Averages</b>                                | <b>4.132</b>     | <b>87.5</b>  |  | Thermocouple ID                               |  | TC25               |                |
|                                                | <b>Delta P</b>   | <b>Temp</b>  |  |                                               |  |                    |                |
| <b>Point No.</b>                               | <b>In Water</b>  | <b>Deg F</b> |  |                                               |  |                    |                |
| <b>A-1</b>                                     | 4.300            | 88           |  | <b>Oxygen %</b>                               |  | <b>20.9</b>        |                |
| <b>2</b>                                       | 5.000            | 88           |  |                                               |  |                    |                |
| <b>3</b>                                       | 5.900            | 88           |  | <b>Carbon Dioxide %</b>                       |  | <b>0</b>           |                |
| <b>4</b>                                       | 3.100            | 88           |  |                                               |  |                    |                |
| <b>5</b>                                       | 2.600            | 87           |  | <b>Moisture %</b>                             |  | <b>2.92</b>        |                |
| <b>6</b>                                       | 2.600            | 87           |  |                                               |  |                    |                |
| <b>7</b>                                       | 2.600            | 87           |  | <b>Stack Area sq.in.</b>                      |  | <b>254.4690087</b> |                |
| <b>8</b>                                       | 2.500            | 85           |  |                                               |  |                    |                |
| <b>B-1</b>                                     | 2.200            | 86           |  | <b>Pbar</b>                                   |  | <b>29.80</b>       |                |
| <b>2</b>                                       | 2.300            | 87           |  |                                               |  |                    |                |
| <b>3</b>                                       | 4.100            | 88           |  | <b>Static Pressure</b>                        |  | <b>3.6</b>         |                |
| <b>4</b>                                       | 5.300            | 89           |  |                                               |  |                    |                |
| <b>5</b>                                       | 5.700            | 88           |  | <b>Pitot Coef.</b>                            |  | <b>0.84</b>        |                |
| <b>6</b>                                       | 6.400            | 88           |  |                                               |  |                    |                |
| <b>7</b>                                       | 6.500            | 88           |  | <b>Start Time</b>                             |  | <b>1013</b>        |                |
| <b>8</b>                                       | 7.900            | 88           |  |                                               |  |                    |                |
| <b>0</b>                                       |                  |              |  | <b>Stop Time</b>                              |  | <b>1017</b>        |                |
| <b>0</b>                                       |                  |              |  |                                               |  |                    |                |
| <b>0</b>                                       |                  |              |  | <b>Absolute Gas Pressure inches water</b>     |  | <b>Ps =</b>        | <b>30.06</b>   |
| <b>0</b>                                       |                  |              |  |                                               |  |                    |                |
| <b>0</b>                                       |                  |              |  | <b>Dry Mole Fraction of Gas</b>               |  | <b>Mfd =</b>       | <b>0.97079</b> |
| <b>0</b>                                       |                  |              |  |                                               |  |                    |                |
| <b>0</b>                                       |                  |              |  | <b>Dry Molecular Weight of Gas lb/lb Mole</b> |  | <b>Md =</b>        | <b>28.84</b>   |
| <b>0</b>                                       |                  |              |  |                                               |  |                    |                |
| <b>0</b>                                       |                  |              |  | <b>Wet Molecular Weight of Gas lb/lb Mole</b> |  | <b>Ms =</b>        | <b>28.52</b>   |
| <b>0</b>                                       |                  |              |  |                                               |  |                    |                |
| <b>0</b>                                       |                  |              |  | <b>Average Gas Velocity ft/sec</b>            |  | <b>vs =</b>        | <b>116.64</b>  |
| <b>0</b>                                       |                  |              |  |                                               |  |                    |                |
| <b>0</b>                                       |                  |              |  | <b>Dry Volumetric Gas Flow Rate</b>           |  |                    |                |
| <b>0</b>                                       |                  |              |  | <b>at Standard Conditions SCFM</b>            |  | <b>Qsd =</b>       | <b>11634</b>   |
| <b>0</b>                                       |                  |              |  |                                               |  |                    |                |
| <b>0</b>                                       |                  |              |  | <b>Wet Volumetric Flue Gas Flow Rate</b>      |  |                    |                |
| <b>0</b>                                       |                  |              |  | <b>at Stack Conditions ACFM</b>               |  | <b>Qaw =</b>       | <b>12367</b>   |
| <b>0</b>                                       |                  |              |  |                                               |  |                    |                |
| <b>0</b>                                       |                  |              |  | <b>Wet Volumetric Gas Flow Rate</b>           |  |                    |                |
| <b>0</b>                                       |                  |              |  | <b>at Standard Conditions WSCFH</b>           |  | <b>WSCFH =</b>     | <b>719063</b>  |
| <b>0</b>                                       |                  |              |  |                                               |  |                    |                |
| <b>0</b>                                       |                  |              |  | LKCH                                          |  |                    |                |
| <b>0</b>                                       |                  |              |  | Pre                                           |  | 3-4                | good           |
| <b>0</b>                                       |                  |              |  | Post                                          |  | 5-3                | good           |
| <b>0</b>                                       |                  |              |  |                                               |  |                    |                |
| <b>0</b>                                       |                  |              |  |                                               |  |                    |                |



|                                                |                  |              |             |                                                                   |  |                    |                |
|------------------------------------------------|------------------|--------------|-------------|-------------------------------------------------------------------|--|--------------------|----------------|
| Air Control Techniques EPA Method 2 Data Sheet |                  |              |             | ACT Job Number                                                    |  | 1909               |                |
| Client                                         | Enviva           |              |             | ACT Run Number                                                    |  | 6                  |                |
| Plant                                          | Amory            |              |             | Date                                                              |  | 10/15/2013         |                |
| City/State                                     | Amory, MS        |              |             | Gauge ID                                                          |  | 909033             |                |
| Location                                       | Green Hammermill |              |             | Pitot ID                                                          |  | 4Pext              |                |
| <b>Averages</b>                                |                  | <b>4.086</b> | <b>88.4</b> | Thermocouple ID                                                   |  | TC25               |                |
|                                                | <b>Delta P</b>   | <b>Temp</b>  |             |                                                                   |  |                    |                |
| <b>Point No.</b>                               | <b>In Water</b>  | <b>Deg F</b> |             |                                                                   |  |                    |                |
| A-1                                            | 4.000            | 87           |             | <b>Oxygen %</b>                                                   |  | <b>20.9</b>        |                |
| 2                                              | 4.200            | 89           |             |                                                                   |  |                    |                |
| 3                                              | 4.800            | 89           |             | <b>Carbon Dioxide %</b>                                           |  | <b>0</b>           |                |
| 4                                              | 6.400            | 89           |             |                                                                   |  |                    |                |
| 5                                              | 3.300            | 89           |             | <b>Moisture %</b>                                                 |  | <b>2.92</b>        |                |
| 6                                              | 2.700            | 89           |             |                                                                   |  |                    |                |
| 7                                              | 2.600            | 87           |             | <b>Stack Area sq.in.</b>                                          |  | <b>254.4690087</b> |                |
| 8                                              | 2.400            | 85           |             |                                                                   |  |                    |                |
| B-1                                            | 1.600            | 87           |             | <b>Pbar</b>                                                       |  | <b>29.80</b>       |                |
| 2                                              | 2.300            | 89           |             |                                                                   |  |                    |                |
| 3                                              | 4.000            | 89           |             | <b>Static Pressure</b>                                            |  | <b>3.6</b>         |                |
| 4                                              | 5.300            | 89           |             |                                                                   |  |                    |                |
| 5                                              | 5.400            | 89           |             | <b>Pitot Coef.</b>                                                |  | <b>0.84</b>        |                |
| 6                                              | 6.000            | 89           |             |                                                                   |  |                    |                |
| 7                                              | 7.100            | 89           |             | <b>Start Time</b>                                                 |  | <b>1124</b>        |                |
| 8                                              | 5.900            | 90           |             | <b>Stop Time</b>                                                  |  | <b>1130</b>        |                |
| 0                                              |                  |              |             |                                                                   |  |                    |                |
| 0                                              |                  |              |             |                                                                   |  |                    |                |
| 0                                              |                  |              |             | <b>Absolute Gas Pressure inches water</b>                         |  | <b>Ps =</b>        | <b>30.06</b>   |
| 0                                              |                  |              |             | <b>Dry Mole Fraction of Gas</b>                                   |  | <b>Mfd =</b>       | <b>0.97079</b> |
| 0                                              |                  |              |             | <b>Dry Molecular Weight of Gas lb/lb Mole</b>                     |  | <b>Md =</b>        | <b>28.84</b>   |
| 0                                              |                  |              |             | <b>Wet Molecular Weight of Gas lb/lb Mole</b>                     |  | <b>Ms =</b>        | <b>28.52</b>   |
| 0                                              |                  |              |             | <b>Average Gas Velocity ft/sec</b>                                |  | <b>vs =</b>        | <b>116.09</b>  |
| 0                                              |                  |              |             | <b>Dry Volumetric Gas Flow Rate at Standard Conditions SCFM</b>   |  | <b>Qsd =</b>       | <b>11560</b>   |
| 0                                              |                  |              |             | <b>Wet Volumetric Flue Gas Flow Rate at Stack Conditions ACFM</b> |  | <b>Qaw =</b>       | <b>12309</b>   |
| 0                                              |                  |              |             | <b>Wet Volumetric Gas Flow Rate at Standard Conditions WSCFH</b>  |  | <b>WSCFH =</b>     | <b>714468</b>  |
| 0                                              |                  |              |             |                                                                   |  |                    |                |
| 0                                              |                  |              |             | LKCH                                                              |  |                    |                |
| 0                                              |                  |              |             | Pre                                                               |  | 3-4                | good           |
| 0                                              |                  |              |             | Post                                                              |  | 5-3                | good           |
| 0                                              |                  |              |             |                                                                   |  |                    |                |
| 0                                              |                  |              |             |                                                                   |  |                    |                |

Air Control Techniques, P.C.  
Moisture Sampling Train Field Data Sheet

Date 10/14/13

| SOURCE IDENTIFICATION |           | EQUIPMENT IDENTIFICATION |        |
|-----------------------|-----------|--------------------------|--------|
| Facility              | ENVIVA    | Umbilical ID             | 90     |
| City, State           | Amory, MS | Meterbox ID              | 909033 |
| Test Location         |           | $\Delta H @$             | 1.917  |
| Personnel             | TJB JBG   | Gamma ( $\gamma$ )       | 0.9828 |

| Run Identification <u>M4-1</u> |                    |                                   |                  | Actual                |                  |                   | Req'd               |                 | Vac |  |
|--------------------------------|--------------------|-----------------------------------|------------------|-----------------------|------------------|-------------------|---------------------|-----------------|-----|--|
|                                |                    |                                   |                  | Pre Leak Check        |                  |                   | < 0.02 or 4%        |                 | 16  |  |
|                                |                    |                                   |                  | Post Leak Check       |                  |                   | < 0.02 or 4%        |                 | 16  |  |
| Clock Time                     | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.) | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |     |  |
| 1515                           | 180.200            | 0                                 | 85               | 1.0                   | N/A              | N/A               | 59                  | 3               |     |  |
| 1530                           | 188.51             | 15                                | 92               |                       |                  |                   | 53                  | 3               |     |  |
| 1545                           | 197.26             | 30                                | 94               |                       |                  |                   | 54                  | 3               |     |  |
| 1600                           | 204.42             | 45                                | 95               |                       |                  |                   | 56                  | 3               |     |  |
| 1615                           | 210.892            | 60                                |                  |                       |                  |                   |                     |                 |     |  |

| Run Identification <u>M4-2</u> |                    |                                   |                  | Actual                |                  |                   | Req'd               |                 | Vac |  |
|--------------------------------|--------------------|-----------------------------------|------------------|-----------------------|------------------|-------------------|---------------------|-----------------|-----|--|
|                                |                    |                                   |                  | Pre Leak Check        |                  |                   | < 0.02 or 4%        |                 | 13  |  |
|                                |                    |                                   |                  | Post Leak Check       |                  |                   | < 0.02 or 4%        |                 | 10  |  |
| Clock Time                     | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.) | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |     |  |
| 1640                           | 0                  | 211.600                           | 95               | 1.0                   | N/A              | N/A               | 55                  | 3               |     |  |
| 1655                           | 15                 | 221.71                            | 94               |                       |                  |                   | 51                  | 3               |     |  |
| 1710                           | 30                 | 229.56                            | 93               |                       |                  |                   | 53                  | 3               |     |  |
| 1725                           | 45                 | 237.91                            | 92               |                       |                  |                   | 54                  | 3               |     |  |
| 1740                           | 60                 | 246.729                           |                  |                       |                  |                   |                     |                 |     |  |

| Run Identification <u>M4-3</u> |                    |                                   |                  | Actual                |                  |                   | Req'd               |                 | Vac |  |
|--------------------------------|--------------------|-----------------------------------|------------------|-----------------------|------------------|-------------------|---------------------|-----------------|-----|--|
|                                |                    |                                   |                  | Pre Leak Check        |                  |                   | < 0.02 or 4%        |                 | 10  |  |
|                                |                    |                                   |                  | Post Leak Check       |                  |                   | < 0.02 or 4%        |                 | 7   |  |
| Clock Time                     | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.) | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |     |  |
| 1758                           | 0                  | 247.000                           | 89               | 1.0                   | N/A              | N/A               | 54                  | 3               |     |  |
| 1813                           | 15                 | 255.44                            | 88               |                       |                  |                   | 53                  | 3               |     |  |
| 1828                           | 30                 | 263.25                            | 88               |                       |                  |                   | 52                  | 3               |     |  |
| 1843                           | 45                 | 269.87                            | 87               |                       |                  |                   | 56                  | 3               |     |  |
| 1858                           | 60                 | 278.084                           |                  |                       |                  |                   |                     |                 |     |  |

# Method 4 - Air Control Techniques, P.C.

Date

## Identification Information

Client ENDURA  
Plant Name AMERY  
City AMERY

Job 1909  
Process DRYER  
State MS

## Sampling Information

Run Number             
Sampling Date             
Recovery Date             
Personnel TTR JBG

Balance Number V1000  
Balance Type Electronic  
Balance Level L  
Recovery Area ✓

## Location Moisture Data

Run Number M4-1 2 3

### Impinger 1

|                           |              |              |              |
|---------------------------|--------------|--------------|--------------|
| Final Weight, grams/mls   | <u>780.4</u> | <u>796.5</u> | <u>854.4</u> |
| Initial Weight, grams/mls | <u>709.5</u> | <u>717.2</u> | <u>780.4</u> |
| Condensed Water, grams    | <u>70.9</u>  | <u>79.3</u>  | <u>74.0</u>  |

### Impinger 2

|                           |              |              |              |
|---------------------------|--------------|--------------|--------------|
| Final Weight, grams/mls   | <u>679.3</u> | <u>724.1</u> | <u>683.8</u> |
| Initial Weight, grams/mls | <u>673.6</u> | <u>718.9</u> | <u>679.3</u> |
| Condensed Water, grams    | <u>5.7</u>   | <u>5.2</u>   | <u>4.5</u>   |

### Impinger 3

|                           |              |              |              |
|---------------------------|--------------|--------------|--------------|
| Final Weight, grams/mls   | <u>604.5</u> | <u>613.3</u> | <u>605.5</u> |
| Initial Weight, grams/mls | <u>603.1</u> | <u>612.5</u> | <u>604.5</u> |
| Condensed Water, grams    | <u>1.4</u>   | <u>0.8</u>   | <u>1.0</u>   |

Condensed Water, grams                                 

### Silica Gel

|                       |              |              |              |
|-----------------------|--------------|--------------|--------------|
| Final Weight, grams   | <u>802.5</u> | <u>823.0</u> | <u>808.5</u> |
| Initial Weight, grams | <u>796.7</u> | <u>816.4</u> | <u>802.5</u> |
| Adsorbed Water, grams | <u>5.8</u>   | <u>6.6</u>   | <u>6.0</u>   |

Adsorbed Water, grams                                 

Total Water, grams 83.8 91.9           

$V_m(\text{std})$  = Volume of gas sampled at standard conditions (dscf)

$V_m(\text{std}) = ((\text{Gamma} * 17.64 * V_m * (\text{Pbar} + (\Delta H / 13.6))) / (\text{Tm} + 460))$

$V_{wc}(\text{std})$  = volume of water vapor at standard conditions (scf)

$V_{wc}(\text{std}) = (0.04707) * (\text{volume of water collected (mls)})$

Bws = Mole fraction of water vapor

$Bws = V_{wc}(\text{std}) / (V_m(\text{std}) + V_{wc}(\text{std}))$

Percent Moisture =  $100 * Bws$



**Air Control Techniques, P.C.**  
**Moisture Sampling Train Field Data Sheet**

Date 10/16/13

| SOURCE IDENTIFICATION |                  | EQUIPMENT IDENTIFICATION |         |
|-----------------------|------------------|--------------------------|---------|
| Facility              | ENVIVA           | Umbilical ID             | 90      |
| City, State           | AMORY, MS        | Meterbox ID              | 909033  |
| Test Location         | Green Hammermill | $\Delta H$ @             | 1.917   |
| Personnel             | TB, JBG          | Gamma ( $\gamma$ )       | 0.98028 |

| Run Identification <u>M-4</u> |                    |                                   |                  | <table border="1"> <tr> <th></th> <th>Actual</th> <th>Req'd</th> <th>Vac</th> </tr> <tr> <td>Pre Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>15</td> </tr> <tr> <td>Post Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>12</td> </tr> </table> |                  |                   |                     | Actual          | Req'd | Vac | Pre Leak Check | 0.000 | < 0.02 or 4% | 15 | Post Leak Check | 0.000 | < 0.02 or 4% | 12 |
|-------------------------------|--------------------|-----------------------------------|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-------------------|---------------------|-----------------|-------|-----|----------------|-------|--------------|----|-----------------|-------|--------------|----|
|                               | Actual             | Req'd                             | Vac              |                                                                                                                                                                                                                                                                             |                  |                   |                     |                 |       |     |                |       |              |    |                 |       |              |    |
| Pre Leak Check                | 0.000              | < 0.02 or 4%                      | 15               |                                                                                                                                                                                                                                                                             |                  |                   |                     |                 |       |     |                |       |              |    |                 |       |              |    |
| Post Leak Check               | 0.000              | < 0.02 or 4%                      | 12               |                                                                                                                                                                                                                                                                             |                  |                   |                     |                 |       |     |                |       |              |    |                 |       |              |    |
| Clock Time                    | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.)                                                                                                                                                                                                                                                       | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |       |     |                |       |              |    |                 |       |              |    |
| 911                           | 0                  | 278.300                           | 66               | 1.0                                                                                                                                                                                                                                                                         | N/A              | N/A               | 52                  | 3               |       |     |                |       |              |    |                 |       |              |    |
| 926                           | 15                 | 286.65                            | 67               | ↓                                                                                                                                                                                                                                                                           | ↓                | ↓                 | 60                  | 3               |       |     |                |       |              |    |                 |       |              |    |
|                               | 30                 | 294.87                            | 70               | ↓                                                                                                                                                                                                                                                                           | ↓                | ↓                 | 64                  | 3               |       |     |                |       |              |    |                 |       |              |    |
|                               | 45                 | 303.11                            | 72               | ↓                                                                                                                                                                                                                                                                           | ↓                | ↓                 | 65                  | 3               |       |     |                |       |              |    |                 |       |              |    |
|                               | 60                 | 311.263                           |                  | ↓                                                                                                                                                                                                                                                                           | ↓                | ↓                 |                     |                 |       |     |                |       |              |    |                 |       |              |    |

| Run Identification <u>5</u> |                    |                                   |                  | <table border="1"> <tr> <th></th> <th>Actual</th> <th>Req'd</th> <th>Vac</th> </tr> <tr> <td>Pre Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>16</td> </tr> <tr> <td>Post Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>9</td> </tr> </table> |                  |                   |                     | Actual          | Req'd | Vac | Pre Leak Check | 0.000 | < 0.02 or 4% | 16 | Post Leak Check | 0.000 | < 0.02 or 4% | 9 |
|-----------------------------|--------------------|-----------------------------------|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-------------------|---------------------|-----------------|-------|-----|----------------|-------|--------------|----|-----------------|-------|--------------|---|
|                             | Actual             | Req'd                             | Vac              |                                                                                                                                                                                                                                                                            |                  |                   |                     |                 |       |     |                |       |              |    |                 |       |              |   |
| Pre Leak Check              | 0.000              | < 0.02 or 4%                      | 16               |                                                                                                                                                                                                                                                                            |                  |                   |                     |                 |       |     |                |       |              |    |                 |       |              |   |
| Post Leak Check             | 0.000              | < 0.02 or 4%                      | 9                |                                                                                                                                                                                                                                                                            |                  |                   |                     |                 |       |     |                |       |              |    |                 |       |              |   |
| Clock Time                  | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.)                                                                                                                                                                                                                                                      | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |       |     |                |       |              |    |                 |       |              |   |
| 1022                        | 0                  | 311.600                           | 73               | 1.0                                                                                                                                                                                                                                                                        | N/A              | N/A               | 59                  | 3               |       |     |                |       |              |    |                 |       |              |   |
| 1037                        | 15                 | 320.11                            | 76               | ↓                                                                                                                                                                                                                                                                          | ↓                | ↓                 | 60                  | 3               |       |     |                |       |              |    |                 |       |              |   |
| 1052                        | 30                 | 329.01                            | 77               | ↓                                                                                                                                                                                                                                                                          | ↓                | ↓                 | 60                  | 3               |       |     |                |       |              |    |                 |       |              |   |
| 1107                        | 45                 | 337.70                            | 78               | ↓                                                                                                                                                                                                                                                                          | ↓                | ↓                 | 61                  | 3               |       |     |                |       |              |    |                 |       |              |   |
| 1122                        | 60                 | 346.296                           |                  | ↓                                                                                                                                                                                                                                                                          | ↓                | ↓                 |                     |                 |       |     |                |       |              |    |                 |       |              |   |

| Run Identification <u>6</u> |                    |                                   |                  | <table border="1"> <tr> <th></th> <th>Actual</th> <th>Req'd</th> <th>Vac</th> </tr> <tr> <td>Pre Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>14</td> </tr> <tr> <td>Post Leak Check</td> <td>0.110</td> <td>&lt; 0.02 or 4%</td> <td>10</td> </tr> </table> |                  |                   |                     | Actual          | Req'd | Vac | Pre Leak Check | 0.000 | < 0.02 or 4% | 14 | Post Leak Check | 0.110 | < 0.02 or 4% | 10 |
|-----------------------------|--------------------|-----------------------------------|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-------------------|---------------------|-----------------|-------|-----|----------------|-------|--------------|----|-----------------|-------|--------------|----|
|                             | Actual             | Req'd                             | Vac              |                                                                                                                                                                                                                                                                             |                  |                   |                     |                 |       |     |                |       |              |    |                 |       |              |    |
| Pre Leak Check              | 0.000              | < 0.02 or 4%                      | 14               |                                                                                                                                                                                                                                                                             |                  |                   |                     |                 |       |     |                |       |              |    |                 |       |              |    |
| Post Leak Check             | 0.110              | < 0.02 or 4%                      | 10               |                                                                                                                                                                                                                                                                             |                  |                   |                     |                 |       |     |                |       |              |    |                 |       |              |    |
| Clock Time                  | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.)                                                                                                                                                                                                                                                       | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |       |     |                |       |              |    |                 |       |              |    |
| 1140                        | 0                  | 346.500                           | 78               | 1.0                                                                                                                                                                                                                                                                         | N/A              | N/A               | 61                  | 3               |       |     |                |       |              |    |                 |       |              |    |
| 1155                        | 15                 | 355.02                            | 80               | ↓                                                                                                                                                                                                                                                                           | ↓                | ↓                 | 60                  | 3               |       |     |                |       |              |    |                 |       |              |    |
| 1210                        | 30                 | 363.61                            | 80               | ↓                                                                                                                                                                                                                                                                           | ↓                | ↓                 | 62                  | 3               |       |     |                |       |              |    |                 |       |              |    |
| 1225                        | 45                 | 372.43                            | 81               | ↓                                                                                                                                                                                                                                                                           | ↓                | ↓                 | 64                  | 3               |       |     |                |       |              |    |                 |       |              |    |
| 1240                        | 60                 | 380.300                           |                  | ↓                                                                                                                                                                                                                                                                           | ↓                | ↓                 |                     |                 |       |     |                |       |              |    |                 |       |              |    |

# Method 4 - Air Control Techniques, P.C.

Date

## Identification Information

Client ENDURA  
Plant Name Amory  
City Amory

Job 1909  
Process Greenhamm Mill  
State MS

## Sampling Information

Run Number             
Sampling Date             
Recovery Date             
Personnel TTB JBG

Balance Number V1220  
Balance Type Electronic  
Balance Level ✓  
Recovery Area ✓

## Location Moisture Data

Run Number m4-4 5 6

### Impinger 1

|                           |              |              |              |
|---------------------------|--------------|--------------|--------------|
| Final Weight, grams/mls   | <u>809.0</u> | <u>868.8</u> | <u>823.5</u> |
| Initial Weight, grams/mls | <u>796.5</u> | <u>854.4</u> | <u>809.0</u> |
| Condensed Water, grams    | <u>12.5</u>  | <u>14.4</u>  | <u>14.5</u>  |

### Impinger 2

|                           |              |              |              |
|---------------------------|--------------|--------------|--------------|
| Final Weight, grams/mls   | <u>724.2</u> | <u>685.4</u> | <u>727.2</u> |
| Initial Weight, grams/mls | <u>724.1</u> | <u>683.8</u> | <u>724.2</u> |
| Condensed Water, grams    | <u>0.1</u>   | <u>1.6</u>   | <u>3.0</u>   |

### Impinger 3

|                           |              |              |              |
|---------------------------|--------------|--------------|--------------|
| Final Weight, grams/mls   | <u>612.5</u> | <u>605.2</u> | <u>614.0</u> |
| Initial Weight, grams/mls | <u>613.3</u> | <u>605.5</u> | <u>612.5</u> |
| Condensed Water, grams    | <u>-0.8</u>  | <u>-0.3</u>  | <u>1.5</u>   |

Condensed Water, grams                                 

### Silica Gel

|                       |              |              |              |
|-----------------------|--------------|--------------|--------------|
| Final Weight, grams   | <u>827.0</u> | <u>814.2</u> | <u>834.0</u> |
| Initial Weight, grams | <u>823.0</u> | <u>808.5</u> | <u>827.0</u> |
| Adsorbed Water, grams | <u>4.0</u>   | <u>5.7</u>   | <u>7.0</u>   |

Adsorbed Water, grams                                 

Total Water, grams 15.4 21.4 26.0

$V_m(\text{std})$  = Volume of gas sampled at standard conditions (dscf)

$V_m(\text{std}) = ((\text{Gamma} * 17.64 * V_m * (\text{Pbar} + (\Delta H / 13.6)))) / (T_m + 460)$

$V_{wc}(\text{std})$  = volume of water vapor at standard conditions (scf)

$V_{wc}(\text{std}) = (0.04707) * (\text{volume of water collected (mls)})$

$B_{ws}$  = Mole fraction of water vapor

$B_{ws} = V_{wc}(\text{std}) / (V_m(\text{std}) + V_{wc}(\text{std}))$

Percent Moisture =  $100 * B_{ws}$



**Air Control Techniques, P.C.**  
**Moisture Sampling Train Field Data Sheet**

Date 10/15/13

| SOURCE IDENTIFICATION |                | EQUIPMENT IDENTIFICATION |        |
|-----------------------|----------------|--------------------------|--------|
| Facility              | ENVIVA         | Umbilical ID             | 90     |
| City, State           | Amory, MS      | Meterbox ID              | 909033 |
| Test Location         | DRY Hammermill | $\Delta H @$             | 1.917  |
| Personnel             | TJB JRG        | Gamma ( $\gamma$ )       | 0.9828 |

| Run Identification <u>114-7</u> |                    |                                   |                  | <table border="1"> <tr> <th></th> <th>Actual</th> <th>Req'd</th> <th>Vac</th> </tr> <tr> <td>Pre Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>12</td> </tr> <tr> <td>Post Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>10</td> </tr> </table> |                  |                   |                     | Actual          | Req'd | Vac | Pre Leak Check | 0.000 | < 0.02 or 4% | 12 | Post Leak Check | 0.000 | < 0.02 or 4% | 10 |
|---------------------------------|--------------------|-----------------------------------|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-------------------|---------------------|-----------------|-------|-----|----------------|-------|--------------|----|-----------------|-------|--------------|----|
|                                 | Actual             | Req'd                             | Vac              |                                                                                                                                                                                                                                                                             |                  |                   |                     |                 |       |     |                |       |              |    |                 |       |              |    |
| Pre Leak Check                  | 0.000              | < 0.02 or 4%                      | 12               |                                                                                                                                                                                                                                                                             |                  |                   |                     |                 |       |     |                |       |              |    |                 |       |              |    |
| Post Leak Check                 | 0.000              | < 0.02 or 4%                      | 10               |                                                                                                                                                                                                                                                                             |                  |                   |                     |                 |       |     |                |       |              |    |                 |       |              |    |
| Clock Time                      | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.)                                                                                                                                                                                                                                                       | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |       |     |                |       |              |    |                 |       |              |    |
| 1349                            | 0                  | 380.520                           | 78               | 1.0                                                                                                                                                                                                                                                                         | N/A              | N/A               | 60                  | 3               |       |     |                |       |              |    |                 |       |              |    |
| 1403                            | 15                 | 358.92                            | 77               | ↓                                                                                                                                                                                                                                                                           | ↓                | ↓                 | 56                  | 3               |       |     |                |       |              |    |                 |       |              |    |
| 1418                            | 30                 | 398.03                            | 82               | ↓                                                                                                                                                                                                                                                                           | ↓                | ↓                 | 55                  | 3               |       |     |                |       |              |    |                 |       |              |    |
| 1433                            | 45                 | 416.56                            | 83               | ↓                                                                                                                                                                                                                                                                           | ↓                | ↓                 | 56                  | 3               |       |     |                |       |              |    |                 |       |              |    |
| 1448                            | 60                 | 415.418                           |                  |                                                                                                                                                                                                                                                                             |                  |                   |                     |                 |       |     |                |       |              |    |                 |       |              |    |

| Run Identification <u>8</u> |                    |                                   |                  | <table border="1"> <tr> <th></th> <th>Actual</th> <th>Req'd</th> <th>Vac</th> </tr> <tr> <td>Pre Leak Check</td> <td></td> <td>&lt; 0.02 or 4%</td> <td></td> </tr> <tr> <td>Post Leak Check</td> <td></td> <td>&lt; 0.02 or 4%</td> <td></td> </tr> </table> |                  |                   |                     | Actual          | Req'd | Vac | Pre Leak Check |  | < 0.02 or 4% |  | Post Leak Check |  | < 0.02 or 4% |  |
|-----------------------------|--------------------|-----------------------------------|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-------------------|---------------------|-----------------|-------|-----|----------------|--|--------------|--|-----------------|--|--------------|--|
|                             | Actual             | Req'd                             | Vac              |                                                                                                                                                                                                                                                               |                  |                   |                     |                 |       |     |                |  |              |  |                 |  |              |  |
| Pre Leak Check              |                    | < 0.02 or 4%                      |                  |                                                                                                                                                                                                                                                               |                  |                   |                     |                 |       |     |                |  |              |  |                 |  |              |  |
| Post Leak Check             |                    | < 0.02 or 4%                      |                  |                                                                                                                                                                                                                                                               |                  |                   |                     |                 |       |     |                |  |              |  |                 |  |              |  |
| Clock Time                  | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.)                                                                                                                                                                                                                                         | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |       |     |                |  |              |  |                 |  |              |  |
|                             | 0                  |                                   |                  | 1.0                                                                                                                                                                                                                                                           | N/A              | N/A               |                     |                 |       |     |                |  |              |  |                 |  |              |  |
|                             | 15                 |                                   |                  | ↓                                                                                                                                                                                                                                                             | ↓                | ↓                 |                     |                 |       |     |                |  |              |  |                 |  |              |  |
|                             | 30                 |                                   |                  |                                                                                                                                                                                                                                                               |                  |                   |                     |                 |       |     |                |  |              |  |                 |  |              |  |
|                             | 45                 |                                   |                  |                                                                                                                                                                                                                                                               |                  |                   |                     |                 |       |     |                |  |              |  |                 |  |              |  |
|                             | 60                 |                                   |                  |                                                                                                                                                                                                                                                               |                  |                   |                     |                 |       |     |                |  |              |  |                 |  |              |  |

| Run Identification <u>9</u> |                    |                                   |                  | <table border="1"> <tr> <th></th> <th>Actual</th> <th>Req'd</th> <th>Vac</th> </tr> <tr> <td>Pre Leak Check</td> <td></td> <td>&lt; 0.02 or 4%</td> <td></td> </tr> <tr> <td>Post Leak Check</td> <td></td> <td>&lt; 0.02 or 4%</td> <td></td> </tr> </table> |                  |                   |                     | Actual          | Req'd | Vac | Pre Leak Check |  | < 0.02 or 4% |  | Post Leak Check |  | < 0.02 or 4% |  |
|-----------------------------|--------------------|-----------------------------------|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-------------------|---------------------|-----------------|-------|-----|----------------|--|--------------|--|-----------------|--|--------------|--|
|                             | Actual             | Req'd                             | Vac              |                                                                                                                                                                                                                                                               |                  |                   |                     |                 |       |     |                |  |              |  |                 |  |              |  |
| Pre Leak Check              |                    | < 0.02 or 4%                      |                  |                                                                                                                                                                                                                                                               |                  |                   |                     |                 |       |     |                |  |              |  |                 |  |              |  |
| Post Leak Check             |                    | < 0.02 or 4%                      |                  |                                                                                                                                                                                                                                                               |                  |                   |                     |                 |       |     |                |  |              |  |                 |  |              |  |
| Clock Time                  | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.)                                                                                                                                                                                                                                         | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |       |     |                |  |              |  |                 |  |              |  |
|                             | 0                  |                                   |                  | 1.0                                                                                                                                                                                                                                                           | N/A              | N/A               |                     |                 |       |     |                |  |              |  |                 |  |              |  |
|                             | 15                 |                                   |                  | ↓                                                                                                                                                                                                                                                             | ↓                | ↓                 |                     |                 |       |     |                |  |              |  |                 |  |              |  |
|                             | 30                 |                                   |                  |                                                                                                                                                                                                                                                               |                  |                   |                     |                 |       |     |                |  |              |  |                 |  |              |  |
|                             | 45                 |                                   |                  |                                                                                                                                                                                                                                                               |                  |                   |                     |                 |       |     |                |  |              |  |                 |  |              |  |
|                             | 60                 |                                   |                  |                                                                                                                                                                                                                                                               |                  |                   |                     |                 |       |     |                |  |              |  |                 |  |              |  |

# Method 4 - Air Control Techniques, P.C.

Date 10/15/13

## Identification Information

|            |               |         |                        |
|------------|---------------|---------|------------------------|
| Client     | <u>ENDURA</u> | Job     | <u>1909</u>            |
| Plant Name | <u>AMORY</u>  | Process | <u>Dry Hammer Mill</u> |
| City       | <u>AMORY</u>  | State   | <u>MS</u>              |

## Sampling Information

|               |                |                |                   |
|---------------|----------------|----------------|-------------------|
| Run Number    |                | Balance Number | <u>V1000</u>      |
| Sampling Date |                | Balance Type   | <u>Electronic</u> |
| Recovery Date |                | Balance Level  | <u>✓</u>          |
| Personnel     | <u>TIB JBG</u> | Recovery Area  | <u>✓</u>          |

## Location Moisture Data

|                           |              |              |              |
|---------------------------|--------------|--------------|--------------|
| Run Number                | <u>7</u>     | <u>8</u>     | <u>9</u>     |
| <u>Impinger 1</u>         |              |              |              |
| Final Weight, grams/mls   | <u>887.0</u> |              |              |
| Initial Weight, grams/mls | <u>868.8</u> | <u>823.5</u> | <u>887.0</u> |
| Condensed Water, grams    | <u>18.2</u>  |              |              |
| <u>Impinger 2</u>         |              |              |              |
| Final Weight, grams/mls   | <u>687.2</u> |              |              |
| Initial Weight, grams/mls | <u>685.4</u> | <u>727.2</u> | <u>687.2</u> |
| Condensed Water, grams    | <u>1.8</u>   |              |              |
| <u>Impinger 3</u>         |              |              |              |
| Final Weight, grams/mls   | <u>605.8</u> |              |              |
| Initial Weight, grams/mls | <u>605.2</u> | <u>614.0</u> | <u>605.8</u> |
| Condensed Water, grams    | <u>0.6</u>   |              |              |
| Condensed Water, grams    |              |              |              |
| <u>Silica Gel</u>         |              |              |              |
| Final Weight, grams       | <u>819.9</u> |              |              |
| Initial Weight, grams     | <u>814.2</u> | <u>834.0</u> | <u>819.9</u> |
| Adsorbed Water, grams     | <u>5.7</u>   |              |              |
| Adsorbed Water, grams     | <u>—</u>     | <u>—</u>     | <u>—</u>     |
| Total Water, grams        | <u>26.3</u>  |              |              |

$Vm(std) = \text{Volume of gas sampled at standard conditions (dscf)}$   
 $Vm(std) = ((\text{Gamma} * 17.64 * Vm * (Pbar + (\Delta H / 13.6))) / (Tm + 460))$   
 $Vwc(std) = \text{volume of water vapor at standard conditions (scf)}$   
 $Vwc(std) = (0.04707) * (\text{volume of water collected (mls)})$   
 $Bws = \text{Mole fraction of water vapor}$   
 $Bws = Vwc(std) / (Vm(std) + Vwc(std))$   
 $\text{Percent Moisture} = 100 * Bws$



**Air Control Techniques, P.C.**  
**Moisture Sampling Train Field Data Sheet**

Date 10/15/13

| SOURCE IDENTIFICATION |                              | EQUIPMENT IDENTIFICATION |        |
|-----------------------|------------------------------|--------------------------|--------|
| Facility              | ENVIVA                       | Umbilical ID             | 90     |
| City, State           | ANDRY MS                     | Meterbox ID              | 909033 |
| Test Location         | Perlet Mill Cooler Aspirator | $\Delta H$               | 1.917  |
| Personnel             | TJB Jobe                     | Gamma ( $\gamma$ )       | 0.9828 |

| Run Identification |  |  |  | Actual          |       |              |    |  | Req'd | Vac |
|--------------------|--|--|--|-----------------|-------|--------------|----|--|-------|-----|
| M4-8               |  |  |  | Pre Leak Check  | 0.000 | < 0.02 or 4% | 15 |  |       |     |
|                    |  |  |  | Post Leak Check | 0.000 | < 0.02 or 4% | 7  |  |       |     |

| Clock Time | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.) | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |
|------------|--------------------|-----------------------------------|------------------|-----------------------|------------------|-------------------|---------------------|-----------------|
| 1736       | 0                  | 416.000                           | 77               | N/A                   | N/A              | N/A               | 64                  | 3               |
| 1751       | 15                 | 424.31                            | 86               |                       |                  |                   | 50                  | 3               |
| 1806       | 30                 | 432.72                            | 80               |                       |                  |                   | 51                  | 3               |
| 1821       | 45                 | 441.21                            | 81               |                       |                  |                   | 52                  | 3               |
| 1836       | 60                 | 449.483                           |                  |                       |                  |                   |                     |                 |

| Run Identification |  |  |  | Actual          |       |              |    |  | Req'd | Vac |
|--------------------|--|--|--|-----------------|-------|--------------|----|--|-------|-----|
| 98                 |  |  |  | Pre Leak Check  | 0.000 | < 0.02 or 4% | 9  |  |       |     |
|                    |  |  |  | Post Leak Check | 0.000 | < 0.02 or 4% | 12 |  |       |     |

| Clock Time | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.) | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |
|------------|--------------------|-----------------------------------|------------------|-----------------------|------------------|-------------------|---------------------|-----------------|
| 1849       | 0                  | 449.600                           | 80               | 1.0                   | N/A              | N/A               | 53                  | 3               |
| 1904       | 15                 | 456.600                           | 81               |                       |                  |                   | 62                  | 3               |
| 1919       | 30                 | 466.62                            | 82               |                       |                  |                   | 61                  | 3               |
| 1934       | 45                 | 475.25                            | 82               |                       |                  |                   | 61                  | 3               |
| 1949       | 60                 | 483.443                           |                  |                       |                  |                   |                     |                 |

| Run Identification |  |  |  | Actual          |       |              |    |  | Req'd | Vac |
|--------------------|--|--|--|-----------------|-------|--------------|----|--|-------|-----|
| 10                 |  |  |  | Pre Leak Check  | 0.000 | < 0.02 or 4% | 11 |  |       |     |
|                    |  |  |  | Post Leak Check | 0.000 | < 0.02 or 4% | 7  |  |       |     |

| Clock Time | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.) | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |
|------------|--------------------|-----------------------------------|------------------|-----------------------|------------------|-------------------|---------------------|-----------------|
| 2000       | 0                  | 484.100                           | 80               | 1.0                   | N/A              | N/A               | 51                  | 3               |
| 2015       | 15                 | 492.71                            | 81               |                       |                  |                   | 66                  | 3               |
| 2030       | 30                 | 501.11                            | 81               |                       |                  |                   | 64                  | 3               |
| 2045       | 45                 | 509.43                            | 81               |                       |                  |                   | 64                  | 3               |
| 2100       | 60                 | 517.924                           |                  |                       |                  |                   |                     |                 |



# Method 4 - Air Control Techniques, P.C.

Date 10/15/13

## Identification Information

Client ENVIWA  
Plant Name AMORY  
City AMORY

Job 1909  
Process ASPIRATOR  
State MS

## Sampling Information

Run Number             
Sampling Date             
Recovery Date             
Personnel TJB JBG

Balance Number V1600  
Balance Type Electronic  
Balance Level ✓  
Recovery Area ✓

## Location Moisture Data

Run Number 8 9 10

### Impinger 1

|                           |       |       |       |
|---------------------------|-------|-------|-------|
| Final Weight, grams/mls   | 874.7 | 937.5 | 926.5 |
| Initial Weight, grams/mls | 823.5 | 887.0 | 874.7 |
| Condensed Water, grams    | 51.2  | 50.2  | 51.8  |

### Impinger 2

|                           |       |       |       |
|---------------------------|-------|-------|-------|
| Final Weight, grams/mls   | 729.3 | 692.2 | 734.1 |
| Initial Weight, grams/mls | 727.2 | 687.2 | 729.3 |
| Condensed Water, grams    | 2.1   | 5.0   | 4.8   |

### Impinger 3

|                           |       |       |       |
|---------------------------|-------|-------|-------|
| Final Weight, grams/mls   | 614.2 | 606.3 | 615.2 |
| Initial Weight, grams/mls | 614.0 | 605.8 | 614.2 |
| Condensed Water, grams    | 0.2   | 0.5   | 1.0   |

Condensed Water, grams 53.5

### Silica Gel

|                       |       |       |       |
|-----------------------|-------|-------|-------|
| Final Weight, grams   | 838.3 | 825.6 | 843.1 |
| Initial Weight, grams | 834.0 | 819.9 | 838.3 |
| Adsorbed Water, grams | 4.3   | 5.7   | 4.8   |

Adsorbed Water, grams           

Total Water, grams 57.8 61.4 62.4

$V_m(\text{std})$  = Volume of gas sampled at standard conditions (dscf)

$V_m(\text{std}) = ((\text{Gamma} * 17.64 * V_m * (P_{\text{bar}} + (\Delta H / 13.6))) / (T_m + 460))$

$V_{wc}(\text{std})$  = volume of water vapor at standard conditions (scf)

$V_{wc}(\text{std}) = (0.04707) * (\text{volume of water collected (mls)})$

$B_{ws}$  = Mole fraction of water vapor

$B_{ws} = V_{wc}(\text{std}) / (V_m(\text{std}) + V_{wc}(\text{std}))$

Percent Moisture =  $100 * B_{ws}$

**Air Control Techniques, P.C.**  
**Moisture Sampling Train Field Data Sheet**

Date 10/16/13

| SOURCE IDENTIFICATION |                 | EQUIPMENT IDENTIFICATION |        |
|-----------------------|-----------------|--------------------------|--------|
| Facility              | AMORY ENVIVA    | Umbilical ID             | 90     |
| City, State           | AMORY MS        | Meterbox ID              | 909033 |
| Test Location         | DRY Hammer Mill | $\Delta H$               | 1.917  |
| Personnel             | MB JB           | Gamma ( $\gamma$ )       | 0.4828 |

| Run Identification <u>11</u> |                    |                                   |                  | <table border="1"> <thead> <tr> <th></th> <th>Actual</th> <th>Req'd</th> <th>Vac</th> </tr> </thead> <tbody> <tr> <td>Pre Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>16</td> </tr> <tr> <td>Post Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>19</td> </tr> </tbody> </table> |                  |                   |                     |                 |  | Actual | Req'd | Vac | Pre Leak Check | 0.000 | < 0.02 or 4% | 16 | Post Leak Check | 0.000 | < 0.02 or 4% | 19 |
|------------------------------|--------------------|-----------------------------------|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-------------------|---------------------|-----------------|--|--------|-------|-----|----------------|-------|--------------|----|-----------------|-------|--------------|----|
|                              | Actual             | Req'd                             | Vac              |                                                                                                                                                                                                                                                                                                               |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |    |
| Pre Leak Check               | 0.000              | < 0.02 or 4%                      | 16               |                                                                                                                                                                                                                                                                                                               |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |    |
| Post Leak Check              | 0.000              | < 0.02 or 4%                      | 19               |                                                                                                                                                                                                                                                                                                               |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |    |
| Clock Time                   | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.)                                                                                                                                                                                                                                                                                         | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |  |        |       |     |                |       |              |    |                 |       |              |    |
| 1054                         | 0                  | 518.300                           | 64               | 1.0                                                                                                                                                                                                                                                                                                           | N/A              | N/A               | 61                  | 3               |  |        |       |     |                |       |              |    |                 |       |              |    |
| 1109                         | 15                 | 526.70                            | 67               | ↓                                                                                                                                                                                                                                                                                                             | ↓                | ↓                 | 60                  | 3               |  |        |       |     |                |       |              |    |                 |       |              |    |
| 1124                         | 30                 | 535.13                            | 70               | ↓                                                                                                                                                                                                                                                                                                             | ↓                | ↓                 | 61                  | 3               |  |        |       |     |                |       |              |    |                 |       |              |    |
| 1139                         | 45                 | 543.05                            | 71               | ↓                                                                                                                                                                                                                                                                                                             | ↓                | ↓                 | 61                  | 3               |  |        |       |     |                |       |              |    |                 |       |              |    |
| 1154                         | 60                 | 551.693                           |                  |                                                                                                                                                                                                                                                                                                               |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |    |

| Run Identification <u>12</u> |                    |                                   |                  | <table border="1"> <thead> <tr> <th></th> <th>Actual</th> <th>Req'd</th> <th>Vac</th> </tr> </thead> <tbody> <tr> <td>Pre Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>12</td> </tr> <tr> <td>Post Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>7</td> </tr> </tbody> </table> |                  |                   |                     |                 |  | Actual | Req'd | Vac | Pre Leak Check | 0.000 | < 0.02 or 4% | 12 | Post Leak Check | 0.000 | < 0.02 or 4% | 7 |
|------------------------------|--------------------|-----------------------------------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-------------------|---------------------|-----------------|--|--------|-------|-----|----------------|-------|--------------|----|-----------------|-------|--------------|---|
|                              | Actual             | Req'd                             | Vac              |                                                                                                                                                                                                                                                                                                              |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |
| Pre Leak Check               | 0.000              | < 0.02 or 4%                      | 12               |                                                                                                                                                                                                                                                                                                              |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |
| Post Leak Check              | 0.000              | < 0.02 or 4%                      | 7                |                                                                                                                                                                                                                                                                                                              |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |
| Clock Time                   | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.)                                                                                                                                                                                                                                                                                        | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |  |        |       |     |                |       |              |    |                 |       |              |   |
| 1207                         | 0                  | 551.900                           | 72               | 1.0                                                                                                                                                                                                                                                                                                          | N/A              | N/A               | 62                  | 3               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 1222                         | 15                 | 561.92                            | 75               | ↓                                                                                                                                                                                                                                                                                                            | ↓                | ↓                 | 59                  | 4               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 1237                         | 30                 | 571.82                            | 74               | ↓                                                                                                                                                                                                                                                                                                            | ↓                | ↓                 | 62                  | 3               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 1252                         | 45                 | 580.41                            | 75               | ↓                                                                                                                                                                                                                                                                                                            | ↓                | ↓                 | 61                  | 3               |  |        |       |     |                |       |              |    |                 |       |              |   |
| 1307                         | 60                 | 589.175                           |                  |                                                                                                                                                                                                                                                                                                              |                  |                   |                     |                 |  |        |       |     |                |       |              |    |                 |       |              |   |

| Run Identification <u>13</u> |                    |                                   |                  | <table border="1"> <thead> <tr> <th></th> <th>Actual</th> <th>Req'd</th> <th>Vac</th> </tr> </thead> <tbody> <tr> <td>Pre Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>9</td> </tr> <tr> <td>Post Leak Check</td> <td>0.000</td> <td>&lt; 0.02 or 4%</td> <td>8</td> </tr> </tbody> </table> |                  |                   |                     |                 |  | Actual | Req'd | Vac | Pre Leak Check | 0.000 | < 0.02 or 4% | 9 | Post Leak Check | 0.000 | < 0.02 or 4% | 8 |
|------------------------------|--------------------|-----------------------------------|------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-------------------|---------------------|-----------------|--|--------|-------|-----|----------------|-------|--------------|---|-----------------|-------|--------------|---|
|                              | Actual             | Req'd                             | Vac              |                                                                                                                                                                                                                                                                                                             |                  |                   |                     |                 |  |        |       |     |                |       |              |   |                 |       |              |   |
| Pre Leak Check               | 0.000              | < 0.02 or 4%                      | 9                |                                                                                                                                                                                                                                                                                                             |                  |                   |                     |                 |  |        |       |     |                |       |              |   |                 |       |              |   |
| Post Leak Check              | 0.000              | < 0.02 or 4%                      | 8                |                                                                                                                                                                                                                                                                                                             |                  |                   |                     |                 |  |        |       |     |                |       |              |   |                 |       |              |   |
| Clock Time                   | Elapsed Time (min) | Volume Metered (ft <sup>3</sup> ) | Meter Temp. (°F) | $\Delta H$ (in. W.C.)                                                                                                                                                                                                                                                                                       | Probe Temp. (°F) | Filter Temp. (°F) | Impinger Temp. (°F) | Vacuum (in. Hg) |  |        |       |     |                |       |              |   |                 |       |              |   |
| 1321                         | 0                  | 589.400                           | 74               | 1.0                                                                                                                                                                                                                                                                                                         | N/A              | N/A               | 57                  | 3               |  |        |       |     |                |       |              |   |                 |       |              |   |
| 1336                         | 15                 | 597.865                           | 75               | ↓                                                                                                                                                                                                                                                                                                           | ↓                | ↓                 | 60                  | 3               |  |        |       |     |                |       |              |   |                 |       |              |   |
| 1351                         | 30                 | 606.43                            | 76               | ↓                                                                                                                                                                                                                                                                                                           | ↓                | ↓                 | 59                  | 3               |  |        |       |     |                |       |              |   |                 |       |              |   |
| 1406                         | 45                 | 614.61                            | 77               | ↓                                                                                                                                                                                                                                                                                                           | ↓                | ↓                 | 60                  | 3               |  |        |       |     |                |       |              |   |                 |       |              |   |
| 1421                         | 60                 | 622.809                           |                  |                                                                                                                                                                                                                                                                                                             |                  |                   |                     |                 |  |        |       |     |                |       |              |   |                 |       |              |   |



# Method 4 - Air Control Techniques, P.C.

Date  

## Identification Information

Client ENVIVA  
Plant Name AMDRI  
City AMDRI

Job 1909  
Process DRY Hammer Mill  
State MS

## Sampling Information

Run Number    
Sampling Date    
Recovery Date    
Personnel  

Balance Number V1200  
Balance Type Electronic  
Balance Level L  
Recovery Area L

## Location Moisture Data

Run Number 11 12 13

### Impinger 1

|                           |       |       |       |
|---------------------------|-------|-------|-------|
| Final Weight, grams/mls   | 763.5 | 934.0 | 786.3 |
| Initial Weight, grams/mls | 746.5 | 926.5 | 763.5 |
| Condensed Water, grams    | 17.0  | 7.5   | 22.8  |

### Impinger 2

|                           |       |       |       |
|---------------------------|-------|-------|-------|
| Final Weight, grams/mls   | 693.1 | 748.7 | 694.4 |
| Initial Weight, grams/mls | 692.2 | 734.1 | 693.1 |
| Condensed Water, grams    | 0.9   | 14.6  | 1.3   |

### Impinger 3

|                           |       |       |       |
|---------------------------|-------|-------|-------|
| Final Weight, grams/mls   | 605.6 | 616.1 | 607.2 |
| Initial Weight, grams/mls | 614.2 | 615.2 | 605.6 |
| Condensed Water, grams    | -0.7  | 0.9   | 1.6   |

Condensed Water, grams 606.3

Condensed Water, grams      

### Silica Gel

|                       |       |       |       |
|-----------------------|-------|-------|-------|
| Final Weight, grams   | 829.0 | 847.0 | 832.6 |
| Initial Weight, grams | 825.6 | 843.1 | 829.0 |
| Adsorbed Water, grams | 3.4   | 3.9   | 3.6   |

Adsorbed Water, grams      

Total Water, grams 20.6 26.9 30.3

$V_m(\text{std})$  = Volume of gas sampled at standard conditions (dscf)

$V_m(\text{std}) = ((\text{Gamma} * 17.64 * V_m * (\text{Pbar} + (\Delta H / 13.6))) / (T_m + 460))$

$V_{wc}(\text{std})$  = volume of water vapor at standard conditions (scf)

$V_{wc}(\text{std}) = (0.04707) * (\text{volume of water collected (mls)})$

Bws = Mole fraction of water vapor

$Bws = V_{wc}(\text{std}) / (V_m(\text{std}) + V_{wc}(\text{std}))$

Percent Moisture =  $100 * Bws$

## **APPENDIX B**

### **Method 25A Data**

Test Run 1 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Amory

Location: Dryer Run 1

THC  
ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/14/2013 | 15:16:06 | 29.84 |
| 10/14/2013 | 15:17:06 | 29.38 |
| 10/14/2013 | 15:18:07 | 29.23 |
| 10/14/2013 | 15:19:08 | 29.5  |
| 10/14/2013 | 15:20:06 | 29.43 |
| 10/14/2013 | 15:21:06 | 29.07 |
| 10/14/2013 | 15:22:06 | 28.69 |
| 10/14/2013 | 15:23:07 | 28.19 |
| 10/14/2013 | 15:24:07 | 28.8  |
| 10/14/2013 | 15:25:07 | 29.25 |
| 10/14/2013 | 15:26:08 | 29.42 |
| 10/14/2013 | 15:27:06 | 29.42 |
| 10/14/2013 | 15:28:06 | 29.37 |
| 10/14/2013 | 15:29:06 | 29.27 |
| 10/14/2013 | 15:30:07 | 28.87 |
| 10/14/2013 | 15:31:07 | 28.67 |
| 10/14/2013 | 15:32:07 | 29.34 |
| 10/14/2013 | 15:33:07 | 29.91 |
| 10/14/2013 | 15:34:06 | 29.97 |
| 10/14/2013 | 15:35:06 | 29.72 |
| 10/14/2013 | 15:36:06 | 29.81 |
| 10/14/2013 | 15:37:07 | 30.15 |
| 10/14/2013 | 15:38:07 | 30.47 |
| 10/14/2013 | 15:39:07 | 30.79 |
| 10/14/2013 | 15:40:07 | 30.98 |
| 10/14/2013 | 15:41:08 | 31.24 |
| 10/14/2013 | 15:42:06 | 30.95 |
| 10/14/2013 | 15:43:06 | 30.53 |
| 10/14/2013 | 15:44:06 | 29.96 |
| 10/14/2013 | 15:45:07 | 29.76 |
| 10/14/2013 | 15:46:07 | 30.29 |
| 10/14/2013 | 15:47:07 | 30.72 |
| 10/14/2013 | 15:48:07 | 31.05 |
| 10/14/2013 | 15:49:06 | 31.74 |
| 10/14/2013 | 15:50:06 | 31.76 |
| 10/14/2013 | 15:51:06 | 31.92 |
| 10/14/2013 | 15:52:06 | 31.8  |
| 10/14/2013 | 15:53:07 | 30.91 |
| 10/14/2013 | 15:54:07 | 30.34 |
| 10/14/2013 | 15:55:07 | 30.66 |
| 10/14/2013 | 15:56:08 | 31.37 |
| 10/14/2013 | 15:57:06 | 31.66 |
| 10/14/2013 | 15:58:06 | 31.75 |
| 10/14/2013 | 15:59:06 | 31.88 |

|                |            |       |
|----------------|------------|-------|
| 10/14/2013     | 16:00:07   | 32.01 |
| 10/14/2013     | 16:01:07   | 32.08 |
| 10/14/2013     | 16:02:07   | 31.95 |
| 10/14/2013     | 16:03:07   | 31    |
| 10/14/2013     | 16:04:06   | 29.66 |
| 10/14/2013     | 16:05:06   | 28.44 |
| 10/14/2013     | 16:06:06   | 27.74 |
| 10/14/2013     | 16:07:06   | 27.01 |
| 10/14/2013     | 16:08:07   | 26.17 |
| 10/14/2013     | 16:09:07   | 25.71 |
| 10/14/2013     | 16:10:07   | 25.36 |
| 10/14/2013     | 16:11:08   | 25.84 |
| 10/14/2013     | 16:12:06   | 26.07 |
| 10/14/2013     | 16:13:06   | 25.76 |
| 10/14/2013     | 16:14:06   | 25.89 |
| 10/14/2013     | 16:15:06   | 26.02 |
| Average        | 1803 sampl | 29.55 |
| Test Run 1 End |            |       |

Test Run 2 Begin. STRATA Version 3.2

Operator: DGG  
 Plant Name: Enviva Amory  
 Location: Dryer Run 2

THC  
 ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/14/2013 | 16:41:35 | 18.65 |
| 10/14/2013 | 16:42:35 | 17.55 |
| 10/14/2013 | 16:43:35 | 17.23 |
| 10/14/2013 | 16:44:36 | 17.41 |
| 10/14/2013 | 16:45:36 | 17.14 |
| 10/14/2013 | 16:46:36 | 17.01 |
| 10/14/2013 | 16:47:36 | 17.98 |
| 10/14/2013 | 16:48:35 | 19.26 |
| 10/14/2013 | 16:49:35 | 20.5  |
| 10/14/2013 | 16:50:36 | 20.97 |
| 10/14/2013 | 16:51:36 | 21.28 |
| 10/14/2013 | 16:52:36 | 22.13 |
| 10/14/2013 | 16:53:36 | 22.77 |
| 10/14/2013 | 16:54:37 | 22.83 |
| 10/14/2013 | 16:55:35 | 21.93 |
| 10/14/2013 | 16:56:35 | 21.3  |
| 10/14/2013 | 16:57:35 | 21.57 |
| 10/14/2013 | 16:58:36 | 21.17 |
| 10/14/2013 | 16:59:36 | 20.54 |
| 10/14/2013 | 17:00:36 | 21.27 |
| 10/14/2013 | 17:01:36 | 22.16 |
| 10/14/2013 | 17:02:35 | 22.73 |
| 10/14/2013 | 17:03:35 | 22.84 |
| 10/14/2013 | 17:04:35 | 23.05 |
| 10/14/2013 | 17:05:35 | 22.88 |
| 10/14/2013 | 17:06:36 | 22.19 |
| 10/14/2013 | 17:07:36 | 21.93 |
| 10/14/2013 | 17:08:36 | 22.4  |
| 10/14/2013 | 17:09:37 | 22.75 |
| 10/14/2013 | 17:10:35 | 22.57 |
| 10/14/2013 | 17:11:35 | 22.65 |
| 10/14/2013 | 17:12:35 | 22.63 |
| 10/14/2013 | 17:13:36 | 22.69 |
| 10/14/2013 | 17:14:36 | 22.76 |
| 10/14/2013 | 17:15:36 | 22.66 |
| 10/14/2013 | 17:16:36 | 22.62 |
| 10/14/2013 | 17:17:35 | 22.57 |
| 10/14/2013 | 17:18:35 | 22.52 |
| 10/14/2013 | 17:19:35 | 22.7  |
| 10/14/2013 | 17:20:36 | 23.2  |

|            |            |       |
|------------|------------|-------|
| 10/14/2013 | 17:21:36   | 23.48 |
| 10/14/2013 | 17:22:36   | 23.29 |
| 10/14/2013 | 17:23:36   | 23.28 |
| 10/14/2013 | 17:24:37   | 23.34 |
| 10/14/2013 | 17:25:35   | 23.06 |
| 10/14/2013 | 17:26:35   | 22.67 |
| 10/14/2013 | 17:27:35   | 21.3  |
| 10/14/2013 | 17:28:36   | 20.48 |
| 10/14/2013 | 17:29:36   | 20.59 |
| 10/14/2013 | 17:30:36   | 21.05 |
| 10/14/2013 | 17:31:36   | 21.38 |
| 10/14/2013 | 17:32:35   | 21.75 |
| 10/14/2013 | 17:33:35   | 22.32 |
| 10/14/2013 | 17:34:35   | 23.55 |
| 10/14/2013 | 17:35:36   | 24.22 |
| 10/14/2013 | 17:36:36   | 24.7  |
| 10/14/2013 | 17:37:36   | 24.87 |
| 10/14/2013 | 17:38:36   | 24.87 |
| 10/14/2013 | 17:39:35   | 24.85 |
| 10/14/2013 | 17:40:35   | 24.86 |
| Average    | 1795 sampl | 21.88 |

Test Run 2 End



Test Run 3 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Amory

Location: Dryer Run 3

THC

ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/14/2013 | 17:59:03 | 23.65 |
| 10/14/2013 | 18:00:03 | 23.59 |
| 10/14/2013 | 18:01:01 | 23.24 |
| 10/14/2013 | 18:02:01 | 23.09 |
| 10/14/2013 | 18:03:02 | 23.36 |
| 10/14/2013 | 18:04:02 | 23.94 |
| 10/14/2013 | 18:05:02 | 24.25 |
| 10/14/2013 | 18:06:03 | 24.43 |
| 10/14/2013 | 18:07:03 | 23.91 |
| 10/14/2013 | 18:08:01 | 20.3  |
| 10/14/2013 | 18:09:01 | 14.03 |
| 10/14/2013 | 18:10:02 | 21.86 |
| 10/14/2013 | 18:11:02 | 21.83 |
| 10/14/2013 | 18:12:02 | 22.05 |
| 10/14/2013 | 18:13:02 | 22.48 |
| 10/14/2013 | 18:14:03 | 22.72 |
| 10/14/2013 | 18:15:01 | 22.91 |
| 10/14/2013 | 18:16:01 | 23.55 |
| 10/14/2013 | 18:17:01 | 24    |
| 10/14/2013 | 18:18:02 | 23.83 |
| 10/14/2013 | 18:19:02 | 23.35 |
| 10/14/2013 | 18:20:02 | 22.91 |
| 10/14/2013 | 18:21:03 | 22.53 |
| 10/14/2013 | 18:22:03 | 22.03 |
| 10/14/2013 | 18:23:01 | 21.72 |
| 10/14/2013 | 18:24:01 | 21.54 |
| 10/14/2013 | 18:25:02 | 21.53 |
| 10/14/2013 | 18:26:02 | 21.59 |
| 10/14/2013 | 18:27:02 | 21.11 |
| 10/14/2013 | 18:28:02 | 20.57 |
| 10/14/2013 | 18:29:03 | 20.16 |
| 10/14/2013 | 18:30:03 | 19.45 |
| 10/14/2013 | 18:31:01 | 18.75 |
| 10/14/2013 | 18:32:02 | 18.57 |
| 10/14/2013 | 18:33:02 | 19.09 |
| 10/14/2013 | 18:34:02 | 20.04 |
| 10/14/2013 | 18:35:02 | 20.84 |
| 10/14/2013 | 18:36:03 | 21.29 |
| 10/14/2013 | 18:37:01 | 22.01 |
| 10/14/2013 | 18:38:01 | 22.75 |

|            |            |       |
|------------|------------|-------|
| 10/14/2013 | 18:39:02   | 23.32 |
| 10/14/2013 | 18:40:02   | 23.31 |
| 10/14/2013 | 18:41:02   | 23.03 |
| 10/14/2013 | 18:42:02   | 22.55 |
| 10/14/2013 | 18:43:03   | 22.03 |
| 10/14/2013 | 18:44:03   | 21.77 |
| 10/14/2013 | 18:45:01   | 21.28 |
| 10/14/2013 | 18:46:01   | 20.78 |
| 10/14/2013 | 18:47:02   | 21.1  |
| 10/14/2013 | 18:48:02   | 21.25 |
| 10/14/2013 | 18:49:02   | 21.74 |
| 10/14/2013 | 18:50:03   | 22.33 |
| 10/14/2013 | 18:51:03   | 22.64 |
| 10/14/2013 | 18:52:01   | 22.32 |
| 10/14/2013 | 18:53:01   | 22.09 |
| 10/14/2013 | 18:54:02   | 21.95 |
| 10/14/2013 | 18:55:02   | 21.78 |
| 10/14/2013 | 18:56:02   | 22    |
| 10/14/2013 | 18:57:02   | 22.84 |
| 10/14/2013 | 18:58:03   | 23.45 |
| 10/14/2013 | 18:59:01   | 23.63 |
| 10/14/2013 | 19:00:01   | 23.84 |
| Average    | 1862 sampl | 22.2  |

Test Run 3 End

Test Run 4 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Amory

Location: GHM Run 1

THC

ppm

Start Averaging

|            |         |       |
|------------|---------|-------|
| 10/15/2013 | 9:11:26 | 15.95 |
| 10/15/2013 | 9:12:26 | 17.8  |
| 10/15/2013 | 9:13:26 | 21.03 |
| 10/15/2013 | 9:14:25 | 18.51 |
| 10/15/2013 | 9:15:25 | 18.26 |
| 10/15/2013 | 9:16:25 | 16.45 |
| 10/15/2013 | 9:17:25 | 16.65 |
| 10/15/2013 | 9:18:26 | 18.64 |
| 10/15/2013 | 9:19:26 | 18.53 |
| 10/15/2013 | 9:20:26 | 19.32 |
| 10/15/2013 | 9:21:25 | 19.84 |
| 10/15/2013 | 9:22:25 | 18.28 |
| 10/15/2013 | 9:23:25 | 17.88 |
| 10/15/2013 | 9:24:25 | 20.19 |
| 10/15/2013 | 9:25:25 | 20.74 |
| 10/15/2013 | 9:26:26 | 17.95 |
| 10/15/2013 | 9:27:26 | 17.47 |
| 10/15/2013 | 9:28:26 | 17.23 |
| 10/15/2013 | 9:29:25 | 17.82 |
| 10/15/2013 | 9:30:25 | 17.99 |
| 10/15/2013 | 9:31:25 | 16.51 |
| 10/15/2013 | 9:32:25 | 16    |
| 10/15/2013 | 9:33:26 | 17.44 |
| 10/15/2013 | 9:34:26 | 18.18 |
| 10/15/2013 | 9:35:26 | 17.55 |
| 10/15/2013 | 9:36:25 | 17.15 |
| 10/15/2013 | 9:37:25 | 15.8  |
| 10/15/2013 | 9:38:25 | 14.6  |
| 10/15/2013 | 9:39:25 | 14.94 |
| 10/15/2013 | 9:40:26 | 15.11 |
| 10/15/2013 | 9:41:26 | 16.85 |
| 10/15/2013 | 9:42:26 | 16.16 |
| 10/15/2013 | 9:43:26 | 16.03 |
| 10/15/2013 | 9:44:25 | 15.09 |
| 10/15/2013 | 9:45:25 | 15.75 |
| 10/15/2013 | 9:46:25 | 15.88 |
| 10/15/2013 | 9:47:25 | 15.06 |
| 10/15/2013 | 9:48:26 | 14.84 |
| 10/15/2013 | 9:49:26 | 16.07 |
| 10/15/2013 | 9:50:26 | 17    |

|                |           |       |
|----------------|-----------|-------|
| 10/15/2013     | 9:51:26   | 17.1  |
| 10/15/2013     | 9:52:25   | 17.27 |
| 10/15/2013     | 9:53:25   | 17.34 |
| 10/15/2013     | 9:54:25   | 19.1  |
| 10/15/2013     | 9:55:25   | 20.4  |
| 10/15/2013     | 9:56:26   | 17.18 |
| 10/15/2013     | 9:57:26   | 17.29 |
| 10/15/2013     | 9:58:26   | 16.76 |
| 10/15/2013     | 9:59:26   | 17.77 |
| 10/15/2013     | 10:00:25  | 18.76 |
| 10/15/2013     | 10:01:25  | 19.29 |
| 10/15/2013     | 10:02:25  | 19.76 |
| 10/15/2013     | 10:03:26  | 18.99 |
| 10/15/2013     | 10:04:26  | 18.63 |
| 10/15/2013     | 10:05:26  | 18.15 |
| 10/15/2013     | 10:06:26  | 18.46 |
| 10/15/2013     | 10:07:25  | 17.84 |
| 10/15/2013     | 10:08:25  | 16.74 |
| 10/15/2013     | 10:09:25  | 15.89 |
| 10/15/2013     | 10:10:25  | 17.2  |
| Average        | 1794 samç | 17.47 |
| Test Run 4 End |           |       |

Test Run 5 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Amory

Location: GHM Run 2

THC

ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/15/2013 | 10:23:15 | 21.64 |
| 10/15/2013 | 10:24:16 | 22.79 |
| 10/15/2013 | 10:25:16 | 21.11 |
| 10/15/2013 | 10:26:16 | 20.44 |
| 10/15/2013 | 10:27:17 | 20.36 |
| 10/15/2013 | 10:28:15 | 19    |
| 10/15/2013 | 10:29:15 | 17.55 |
| 10/15/2013 | 10:30:15 | 18.13 |
| 10/15/2013 | 10:31:15 | 18.99 |
| 10/15/2013 | 10:32:16 | 19.11 |
| 10/15/2013 | 10:33:16 | 20.15 |
| 10/15/2013 | 10:34:16 | 20.97 |
| 10/15/2013 | 10:35:16 | 20.98 |
| 10/15/2013 | 10:36:15 | 22.77 |
| 10/15/2013 | 10:37:15 | 24.15 |
| 10/15/2013 | 10:38:15 | 22.1  |
| 10/15/2013 | 10:39:16 | 22.37 |
| 10/15/2013 | 10:40:16 | 21.25 |
| 10/15/2013 | 10:41:16 | 21.46 |
| 10/15/2013 | 10:42:16 | 22.62 |
| 10/15/2013 | 10:43:15 | 22.74 |
| 10/15/2013 | 10:44:15 | 19.79 |
| 10/15/2013 | 10:45:15 | 19.21 |
| 10/15/2013 | 10:46:15 | 18.83 |
| 10/15/2013 | 10:47:16 | 16.99 |
| 10/15/2013 | 10:48:16 | 18.07 |
| 10/15/2013 | 10:49:16 | 17.81 |
| 10/15/2013 | 10:50:16 | 16.86 |
| 10/15/2013 | 10:51:15 | 17.4  |
| 10/15/2013 | 10:52:15 | 18.8  |
| 10/15/2013 | 10:53:15 | 19.99 |
| 10/15/2013 | 10:54:16 | 20.83 |
| 10/15/2013 | 10:55:16 | 20.93 |
| 10/15/2013 | 10:56:16 | 22.63 |
| 10/15/2013 | 10:57:16 | 25.91 |
| 10/15/2013 | 10:58:17 | 28.69 |
| 10/15/2013 | 10:59:15 | 27.11 |
| 10/15/2013 | 11:00:15 | 28.57 |
| 10/15/2013 | 11:01:15 | 29.23 |
| 10/15/2013 | 11:02:16 | 28.67 |

|                |            |       |
|----------------|------------|-------|
| 10/15/2013     | 11:03:16   | 28.01 |
| 10/15/2013     | 11:04:16   | 27.22 |
| 10/15/2013     | 11:05:17   | 23.74 |
| 10/15/2013     | 11:06:15   | 25.25 |
| 10/15/2013     | 11:07:15   | 25.76 |
| 10/15/2013     | 11:08:15   | 23.95 |
| 10/15/2013     | 11:09:15   | 20.65 |
| 10/15/2013     | 11:10:16   | 18.9  |
| 10/15/2013     | 11:11:16   | 17.21 |
| 10/15/2013     | 11:12:16   | 16.78 |
| 10/15/2013     | 11:13:16   | 18.22 |
| 10/15/2013     | 11:14:15   | 18.64 |
| 10/15/2013     | 11:15:15   | 18.69 |
| 10/15/2013     | 11:16:15   | 17.69 |
| 10/15/2013     | 11:17:15   | 16.78 |
| 10/15/2013     | 11:18:16   | 18.28 |
| 10/15/2013     | 11:19:16   | 20.17 |
| 10/15/2013     | 11:20:16   | 20.31 |
| 10/15/2013     | 11:21:17   | 19.73 |
| 10/15/2013     | 11:22:15   | 18.97 |
| Average        | 1795 sampl | 21.19 |
| Test Run 5 End |            |       |

Test Run 6 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Amory

Location: GHM Run 3

THC

ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/15/2013 | 11:41:04 | 17.41 |
| 10/15/2013 | 11:42:04 | 17.84 |
| 10/15/2013 | 11:43:04 | 19.12 |
| 10/15/2013 | 11:44:04 | 18.76 |
| 10/15/2013 | 11:45:03 | 19.51 |
| 10/15/2013 | 11:46:03 | 20.52 |
| 10/15/2013 | 11:47:03 | 19.63 |
| 10/15/2013 | 11:48:03 | 21.38 |
| 10/15/2013 | 11:49:04 | 24.22 |
| 10/15/2013 | 11:50:04 | 23.15 |
| 10/15/2013 | 11:51:04 | 25.62 |
| 10/15/2013 | 11:52:04 | 24.73 |
| 10/15/2013 | 11:53:03 | 23.15 |
| 10/15/2013 | 11:54:03 | 25.71 |
| 10/15/2013 | 11:55:03 | 26.11 |
| 10/15/2013 | 11:56:03 | 25.65 |
| 10/15/2013 | 11:57:04 | 26.27 |
| 10/15/2013 | 11:58:04 | 28    |
| 10/15/2013 | 11:59:04 | 27.79 |
| 10/15/2013 | 12:00:04 | 29.58 |
| 10/15/2013 | 12:01:03 | 32.75 |
| 10/15/2013 | 12:02:03 | 33.15 |
| 10/15/2013 | 12:03:03 | 28.65 |
| 10/15/2013 | 12:04:04 | 27.44 |
| 10/15/2013 | 12:05:04 | 27.12 |
| 10/15/2013 | 12:06:04 | 28.95 |
| 10/15/2013 | 12:07:04 | 27.85 |
| 10/15/2013 | 12:08:03 | 24.16 |
| 10/15/2013 | 12:09:03 | 23.8  |
| 10/15/2013 | 12:10:03 | 24.68 |
| 10/15/2013 | 12:11:03 | 24.73 |
| 10/15/2013 | 12:12:04 | 24.19 |
| 10/15/2013 | 12:13:04 | 22.35 |
| 10/15/2013 | 12:14:04 | 22.07 |
| 10/15/2013 | 12:15:05 | 23.04 |
| 10/15/2013 | 12:16:03 | 23.37 |
| 10/15/2013 | 12:17:03 | 23.16 |
| 10/15/2013 | 12:18:03 | 23.44 |
| 10/15/2013 | 12:19:03 | 24.88 |
| 10/15/2013 | 12:20:04 | 25.97 |

|                |            |       |
|----------------|------------|-------|
| 10/15/2013     | 12:21:04   | 26.79 |
| 10/15/2013     | 12:22:04   | 29.86 |
| 10/15/2013     | 12:23:04   | 29.65 |
| 10/15/2013     | 12:24:03   | 28.11 |
| 10/15/2013     | 12:25:03   | 28.32 |
| 10/15/2013     | 12:26:03   | 28.34 |
| 10/15/2013     | 12:27:04   | 30.11 |
| 10/15/2013     | 12:28:04   | 33.06 |
| 10/15/2013     | 12:29:04   | 31.12 |
| 10/15/2013     | 12:30:04   | 31.31 |
| 10/15/2013     | 12:31:03   | 33.58 |
| 10/15/2013     | 12:32:03   | 33.89 |
| 10/15/2013     | 12:33:03   | 31.81 |
| 10/15/2013     | 12:34:03   | 34    |
| 10/15/2013     | 12:35:04   | 35.41 |
| 10/15/2013     | 12:36:04   | 34.64 |
| 10/15/2013     | 12:37:04   | 37.89 |
| 10/15/2013     | 12:38:04   | 37.35 |
| 10/15/2013     | 12:39:03   | 37.29 |
| 10/15/2013     | 12:40:03   | 37.09 |
| Average        | 1805 sampl | 27.22 |
| Test Run 6 End |            |       |



Test Run 7 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Amory

Location: DHM Run 1

THC

ppm

Start Averaging

|            |          |        |
|------------|----------|--------|
| 10/15/2013 | 13:48:31 | 107.89 |
| 10/15/2013 | 13:49:32 | 110.03 |
| 10/15/2013 | 13:50:32 | 116.38 |
| 10/15/2013 | 13:51:32 | 120.33 |
| 10/15/2013 | 13:52:32 | 113.69 |
| 10/15/2013 | 13:53:33 | 113.15 |
| 10/15/2013 | 13:54:33 | 116.63 |
| 10/15/2013 | 13:55:31 | 119.67 |
| 10/15/2013 | 13:56:31 | 117.6  |
| 10/15/2013 | 13:57:32 | 111.59 |
| 10/15/2013 | 13:58:32 | 109.24 |
| 10/15/2013 | 13:59:32 | 105.16 |
| 10/15/2013 | 14:00:32 | 102.32 |
| 10/15/2013 | 14:01:33 | 101.17 |
| 10/15/2013 | 14:02:33 | 101.12 |
| 10/15/2013 | 14:03:31 | 103.02 |
| 10/15/2013 | 14:04:32 | 105.51 |
| 10/15/2013 | 14:05:32 | 105.07 |
| 10/15/2013 | 14:06:32 | 105.27 |
| 10/15/2013 | 14:07:32 | 104.71 |
| 10/15/2013 | 14:08:33 | 101.88 |
| 10/15/2013 | 14:09:33 | 104.45 |
| 10/15/2013 | 14:10:31 | 98.55  |
| 10/15/2013 | 14:11:32 | 93.63  |
| 10/15/2013 | 14:12:32 | 103.55 |
| 10/15/2013 | 14:13:32 | 111.82 |
| 10/15/2013 | 14:14:32 | 111.66 |
| 10/15/2013 | 14:15:33 | 114.77 |
| 10/15/2013 | 14:16:33 | 119.41 |
| 10/15/2013 | 14:17:31 | 112.88 |
| 10/15/2013 | 14:18:31 | 100.76 |
| 10/15/2013 | 14:19:32 | 110.26 |
| 10/15/2013 | 14:20:32 | 115.88 |
| 10/15/2013 | 14:21:32 | 121.53 |
| 10/15/2013 | 14:22:32 | 133.41 |
| 10/15/2013 | 14:23:33 | 138.3  |
| 10/15/2013 | 14:24:33 | 135.21 |
| 10/15/2013 | 14:25:31 | 136.51 |
| 10/15/2013 | 14:26:31 | 136.73 |
| 10/15/2013 | 14:27:32 | 132.16 |

|            |            |        |
|------------|------------|--------|
| 10/15/2013 | 14:28:32   | 132.89 |
| 10/15/2013 | 14:29:32   | 124.24 |
| 10/15/2013 | 14:30:32   | 121.97 |
| 10/15/2013 | 14:31:33   | 127.27 |
| 10/15/2013 | 14:32:33   | 125.19 |
| 10/15/2013 | 14:33:31   | 122.01 |
| 10/15/2013 | 14:34:32   | 130.07 |
| 10/15/2013 | 14:35:32   | 131.88 |
| 10/15/2013 | 14:36:32   | 131.23 |
| 10/15/2013 | 14:37:32   | 132.47 |
| 10/15/2013 | 14:38:33   | 127.67 |
| 10/15/2013 | 14:39:33   | 124.08 |
| 10/15/2013 | 14:40:31   | 129.18 |
| 10/15/2013 | 14:41:31   | 148.63 |
| 10/15/2013 | 14:42:32   | 142.77 |
| 10/15/2013 | 14:43:32   | 113.23 |
| 10/15/2013 | 14:44:32   | 115.39 |
| 10/15/2013 | 14:45:33   | 127.23 |
| 10/15/2013 | 14:46:33   | 121.07 |
| 10/15/2013 | 14:47:33   | 120.79 |
| Average    | 1794 sampl | 117.88 |

Test Run 7 End

Test Run 8 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Amory

Location: Aspirator Run 1

THC

ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/15/2013 | 17:36:54 | 337.1 |
| 10/15/2013 | 17:37:55 | 338.4 |
| 10/15/2013 | 17:38:55 | 336.2 |
| 10/15/2013 | 17:39:55 | 341.3 |
| 10/15/2013 | 17:40:56 | 351.7 |
| 10/15/2013 | 17:41:56 | 352.1 |
| 10/15/2013 | 17:42:56 | 351.1 |
| 10/15/2013 | 17:43:54 | 349.9 |
| 10/15/2013 | 17:44:55 | 350.1 |
| 10/15/2013 | 17:45:55 | 351   |
| 10/15/2013 | 17:46:55 | 353.4 |
| 10/15/2013 | 17:47:55 | 355.3 |
| 10/15/2013 | 17:48:56 | 358   |
| 10/15/2013 | 17:49:56 | 359.9 |
| 10/15/2013 | 17:50:56 | 360.4 |
| 10/15/2013 | 17:51:54 | 361.5 |
| 10/15/2013 | 17:52:55 | 364.1 |
| 10/15/2013 | 17:53:55 | 365.9 |
| 10/15/2013 | 17:54:55 | 366.6 |
| 10/15/2013 | 17:55:56 | 364   |
| 10/15/2013 | 17:56:56 | 365.4 |
| 10/15/2013 | 17:57:56 | 366.7 |
| 10/15/2013 | 17:58:54 | 366.1 |
| 10/15/2013 | 17:59:54 | 367.5 |
| 10/15/2013 | 18:00:55 | 370.4 |
| 10/15/2013 | 18:01:55 | 370.8 |
| 10/15/2013 | 18:02:55 | 373.5 |
| 10/15/2013 | 18:03:55 | 374.6 |
| 10/15/2013 | 18:04:56 | 375.5 |
| 10/15/2013 | 18:05:56 | 375   |
| 10/15/2013 | 18:06:54 | 375.7 |
| 10/15/2013 | 18:07:54 | 372.6 |
| 10/15/2013 | 18:08:55 | 364.6 |
| 10/15/2013 | 18:09:55 | 346.5 |
| 10/15/2013 | 18:10:55 | 321.4 |
| 10/15/2013 | 18:11:56 | 295.2 |
| 10/15/2013 | 18:12:56 | 268.5 |
| 10/15/2013 | 18:13:56 | 260.9 |
| 10/15/2013 | 18:14:54 | 267.1 |
| 10/15/2013 | 18:15:55 | 277.6 |

|                |            |       |
|----------------|------------|-------|
| 10/15/2013     | 18:16:55   | 293.7 |
| 10/15/2013     | 18:17:55   | 305   |
| 10/15/2013     | 18:18:55   | 313.7 |
| 10/15/2013     | 18:19:56   | 321.6 |
| 10/15/2013     | 18:20:56   | 325.9 |
| 10/15/2013     | 18:21:56   | 329.8 |
| 10/15/2013     | 18:22:54   | 333.8 |
| 10/15/2013     | 18:23:55   | 337.9 |
| 10/15/2013     | 18:24:55   | 343.3 |
| 10/15/2013     | 18:25:55   | 349.5 |
| 10/15/2013     | 18:26:55   | 354.7 |
| 10/15/2013     | 18:27:56   | 358.5 |
| 10/15/2013     | 18:28:56   | 362.4 |
| 10/15/2013     | 18:29:54   | 365.4 |
| 10/15/2013     | 18:30:54   | 367.6 |
| 10/15/2013     | 18:31:55   | 371.2 |
| 10/15/2013     | 18:32:55   | 373.7 |
| 10/15/2013     | 18:33:55   | 374   |
| 10/15/2013     | 18:34:55   | 375.1 |
| 10/15/2013     | 18:35:56   | 374.5 |
| Average        | 1805 sampl | 347.8 |
| Test Run 8 End |            |       |

Test Run 9 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Amory

Location: Aspirator Run 2

THC

ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/15/2013 | 18:50:01 | 362.1 |
| 10/15/2013 | 18:51:01 | 364.8 |
| 10/15/2013 | 18:52:02 | 367.6 |
| 10/15/2013 | 18:53:02 | 370.4 |
| 10/15/2013 | 18:54:02 | 373.2 |
| 10/15/2013 | 18:55:03 | 379.6 |
| 10/15/2013 | 18:56:01 | 389.5 |
| 10/15/2013 | 18:57:01 | 397.9 |
| 10/15/2013 | 18:58:01 | 407.9 |
| 10/15/2013 | 18:59:02 | 416.4 |
| 10/15/2013 | 19:00:02 | 417.6 |
| 10/15/2013 | 19:01:02 | 417.3 |
| 10/15/2013 | 19:02:02 | 416.8 |
| 10/15/2013 | 19:03:03 | 418.1 |
| 10/15/2013 | 19:04:01 | 419.9 |
| 10/15/2013 | 19:05:01 | 423.1 |
| 10/15/2013 | 19:06:01 | 424.7 |
| 10/15/2013 | 19:07:02 | 424.2 |
| 10/15/2013 | 19:08:02 | 419.1 |
| 10/15/2013 | 19:09:02 | 415.2 |
| 10/15/2013 | 19:10:02 | 406.7 |
| 10/15/2013 | 19:11:03 | 400.6 |
| 10/15/2013 | 19:12:01 | 392.2 |
| 10/15/2013 | 19:13:01 | 387.1 |
| 10/15/2013 | 19:14:01 | 384.1 |
| 10/15/2013 | 19:15:02 | 382.8 |
| 10/15/2013 | 19:16:02 | 386.5 |
| 10/15/2013 | 19:17:02 | 385.7 |
| 10/15/2013 | 19:18:02 | 383.6 |
| 10/15/2013 | 19:19:03 | 381   |
| 10/15/2013 | 19:20:01 | 377.4 |
| 10/15/2013 | 19:21:01 | 371   |
| 10/15/2013 | 19:22:01 | 365.9 |
| 10/15/2013 | 19:23:02 | 365.8 |
| 10/15/2013 | 19:24:02 | 366.4 |
| 10/15/2013 | 19:25:02 | 368.3 |
| 10/15/2013 | 19:26:02 | 370.1 |
| 10/15/2013 | 19:27:02 | 370.4 |
| 10/15/2013 | 19:28:01 | 369.9 |
| 10/15/2013 | 19:29:01 | 369.8 |

|                |            |       |
|----------------|------------|-------|
| 10/15/2013     | 19:30:01   | 370.6 |
| 10/15/2013     | 19:31:02   | 373.7 |
| 10/15/2013     | 19:32:02   | 376.2 |
| 10/15/2013     | 19:33:02   | 381.4 |
| 10/15/2013     | 19:34:02   | 384.9 |
| 10/15/2013     | 19:35:03   | 387.6 |
| 10/15/2013     | 19:36:01   | 387.4 |
| 10/15/2013     | 19:37:01   | 383.3 |
| 10/15/2013     | 19:38:01   | 377.1 |
| 10/15/2013     | 19:39:02   | 368.2 |
| 10/15/2013     | 19:40:02   | 362.2 |
| 10/15/2013     | 19:41:02   | 357   |
| 10/15/2013     | 19:42:02   | 349.9 |
| 10/15/2013     | 19:43:01   | 345.2 |
| 10/15/2013     | 19:44:01   | 341.2 |
| 10/15/2013     | 19:45:01   | 337.9 |
| 10/15/2013     | 19:46:01   | 338.9 |
| 10/15/2013     | 19:47:02   | 336.4 |
| 10/15/2013     | 19:48:02   | 332.1 |
| 10/15/2013     | 19:49:02   | 330.8 |
| Average        | 1797 sampl | 380.4 |
| Test Run 9 End |            |       |

Test Run 10 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Amory

Location: Aspirator Run 3

THC

ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/15/2013 | 20:01:06 | 305.7 |
| 10/15/2013 | 20:02:06 | 309.3 |
| 10/15/2013 | 20:03:07 | 306.7 |
| 10/15/2013 | 20:04:07 | 303.9 |
| 10/15/2013 | 20:05:07 | 301.2 |
| 10/15/2013 | 20:06:07 | 296.7 |
| 10/15/2013 | 20:07:08 | 294.1 |
| 10/15/2013 | 20:08:08 | 295.9 |
| 10/15/2013 | 20:09:06 | 300.7 |
| 10/15/2013 | 20:10:07 | 306.1 |
| 10/15/2013 | 20:11:07 | 310   |
| 10/15/2013 | 20:12:07 | 311   |
| 10/15/2013 | 20:13:07 | 308.6 |
| 10/15/2013 | 20:14:07 | 302   |
| 10/15/2013 | 20:15:08 | 296.2 |
| 10/15/2013 | 20:16:08 | 292.6 |
| 10/15/2013 | 20:17:06 | 288   |
| 10/15/2013 | 20:18:06 | 282.5 |
| 10/15/2013 | 20:19:07 | 283.6 |
| 10/15/2013 | 20:20:07 | 291.5 |
| 10/15/2013 | 20:21:07 | 299.6 |
| 10/15/2013 | 20:22:07 | 308.1 |
| 10/15/2013 | 20:23:08 | 309.4 |
| 10/15/2013 | 20:24:06 | 307.6 |
| 10/15/2013 | 20:25:06 | 307.1 |
| 10/15/2013 | 20:26:07 | 304.6 |
| 10/15/2013 | 20:27:07 | 304.7 |
| 10/15/2013 | 20:28:07 | 301.7 |
| 10/15/2013 | 20:29:07 | 297   |
| 10/15/2013 | 20:30:08 | 293.4 |
| 10/15/2013 | 20:31:08 | 289.3 |
| 10/15/2013 | 20:32:06 | 284.5 |
| 10/15/2013 | 20:33:07 | 280.3 |
| 10/15/2013 | 20:34:07 | 276   |
| 10/15/2013 | 20:35:07 | 272   |
| 10/15/2013 | 20:36:07 | 268.9 |
| 10/15/2013 | 20:37:08 | 266.9 |
| 10/15/2013 | 20:38:08 | 266.7 |
| 10/15/2013 | 20:39:06 | 267   |
| 10/15/2013 | 20:40:06 | 268.3 |

|                 |           |       |
|-----------------|-----------|-------|
| 10/15/2013      | 20:41:07  | 267.8 |
| 10/15/2013      | 20:42:07  | 266.1 |
| 10/15/2013      | 20:43:07  | 260.8 |
| 10/15/2013      | 20:44:07  | 256.5 |
| 10/15/2013      | 20:45:08  | 253.7 |
| 10/15/2013      | 20:46:08  | 250.8 |
| 10/15/2013      | 20:47:06  | 249.6 |
| 10/15/2013      | 20:48:06  | 250.4 |
| 10/15/2013      | 20:49:07  | 249.6 |
| 10/15/2013      | 20:50:07  | 250.2 |
| 10/15/2013      | 20:51:07  | 250.4 |
| 10/15/2013      | 20:52:07  | 247.3 |
| 10/15/2013      | 20:53:08  | 245.7 |
| 10/15/2013      | 20:54:08  | 243.1 |
| 10/15/2013      | 20:55:06  | 242   |
| 10/15/2013      | 20:56:07  | 239.9 |
| 10/15/2013      | 20:57:07  | 236.5 |
| 10/15/2013      | 20:58:07  | 231.5 |
| 10/15/2013      | 20:59:07  | 228   |
| 10/15/2013      | 21:00:07  | 227.4 |
| Average         | 1799 samp | 278.3 |
| Test Run 10 End |           |       |



Test Run 11 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Amory

Location: DHM Run 2

THC

ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/16/2013 | 10:55:03 | 49.7  |
| 10/16/2013 | 10:56:04 | 43.5  |
| 10/16/2013 | 10:57:04 | 57.5  |
| 10/16/2013 | 10:58:04 | 66.6  |
| 10/16/2013 | 10:59:05 | 68.8  |
| 10/16/2013 | 11:00:05 | 73.6  |
| 10/16/2013 | 11:01:03 | 69.8  |
| 10/16/2013 | 11:02:03 | 65.2  |
| 10/16/2013 | 11:03:04 | 69.8  |
| 10/16/2013 | 11:04:04 | 74.2  |
| 10/16/2013 | 11:05:04 | 74    |
| 10/16/2013 | 11:06:04 | 70.3  |
| 10/16/2013 | 11:07:05 | 72.8  |
| 10/16/2013 | 11:08:05 | 76.2  |
| 10/16/2013 | 11:09:03 | 76.3  |
| 10/16/2013 | 11:10:03 | 68.9  |
| 10/16/2013 | 11:11:04 | 65.8  |
| 10/16/2013 | 11:12:04 | 68.1  |
| 10/16/2013 | 11:13:04 | 69    |
| 10/16/2013 | 11:14:05 | 69.9  |
| 10/16/2013 | 11:15:05 | 73.9  |
| 10/16/2013 | 11:16:05 | 73.1  |
| 10/16/2013 | 11:17:03 | 74.8  |
| 10/16/2013 | 11:18:04 | 75.9  |
| 10/16/2013 | 11:19:04 | 68.4  |
| 10/16/2013 | 11:20:04 | 66.9  |
| 10/16/2013 | 11:21:04 | 70.6  |
| 10/16/2013 | 11:22:05 | 77.4  |
| 10/16/2013 | 11:23:05 | 75.8  |
| 10/16/2013 | 11:24:05 | 79.2  |
| 10/16/2013 | 11:25:03 | 78.8  |
| 10/16/2013 | 11:26:04 | 72.8  |
| 10/16/2013 | 11:27:04 | 65.8  |
| 10/16/2013 | 11:28:04 | 75    |
| 10/16/2013 | 11:29:04 | 89.4  |
| 10/16/2013 | 11:30:05 | 103.9 |
| 10/16/2013 | 11:31:05 | 110.1 |
| 10/16/2013 | 11:32:03 | 116.7 |
| 10/16/2013 | 11:33:03 | 116.5 |
| 10/16/2013 | 11:34:04 | 116.1 |

|                 |            |       |
|-----------------|------------|-------|
| 10/16/2013      | 11:35:04   | 113.4 |
| 10/16/2013      | 11:36:04   | 95.8  |
| 10/16/2013      | 11:37:05   | 88.7  |
| 10/16/2013      | 11:38:05   | 93.6  |
| 10/16/2013      | 11:39:05   | 93.4  |
| 10/16/2013      | 11:40:03   | 94.6  |
| 10/16/2013      | 11:41:03   | 93.6  |
| 10/16/2013      | 11:42:04   | 91.5  |
| 10/16/2013      | 11:43:04   | 88.6  |
| 10/16/2013      | 11:44:04   | 82.2  |
| 10/16/2013      | 11:45:04   | 72.4  |
| 10/16/2013      | 11:46:05   | 85.6  |
| 10/16/2013      | 11:47:05   | 92.9  |
| 10/16/2013      | 11:48:05   | 87.5  |
| 10/16/2013      | 11:49:03   | 83.9  |
| 10/16/2013      | 11:50:04   | 84.4  |
| 10/16/2013      | 11:51:04   | 83.4  |
| 10/16/2013      | 11:52:04   | 86.2  |
| 10/16/2013      | 11:53:04   | 88.5  |
| 10/16/2013      | 11:54:05   | 85.5  |
| Average         | 1802 sampl | 80.3  |
| Test Run 11 End |            |       |

Test Run 12 Begin. STRATA Version 3.2

Operator: DGG  
 Plant Name: Enviva Amory  
 Location: DHM Run 3

THC  
 ppm

Start Averaging

|            |          |      |
|------------|----------|------|
| 10/16/2013 | 12:07:40 | 92.8 |
| 10/16/2013 | 12:08:40 | 94   |
| 10/16/2013 | 12:09:41 | 95.8 |
| 10/16/2013 | 12:10:41 | 91.5 |
| 10/16/2013 | 12:11:41 | 88.4 |
| 10/16/2013 | 12:12:41 | 78.2 |
| 10/16/2013 | 12:13:42 | 77.6 |
| 10/16/2013 | 12:14:40 | 75.3 |
| 10/16/2013 | 12:15:40 | 75.5 |
| 10/16/2013 | 12:16:40 | 75.9 |
| 10/16/2013 | 12:17:41 | 78.5 |
| 10/16/2013 | 12:18:41 | 78   |
| 10/16/2013 | 12:19:41 | 82.9 |
| 10/16/2013 | 12:20:41 | 88.1 |
| 10/16/2013 | 12:21:42 | 93.7 |
| 10/16/2013 | 12:22:40 | 93   |
| 10/16/2013 | 12:23:40 | 91.7 |
| 10/16/2013 | 12:24:40 | 92.8 |
| 10/16/2013 | 12:25:41 | 92.5 |
| 10/16/2013 | 12:26:41 | 87.6 |
| 10/16/2013 | 12:27:41 | 87.2 |
| 10/16/2013 | 12:28:41 | 85.2 |
| 10/16/2013 | 12:29:40 | 84.7 |
| 10/16/2013 | 12:30:40 | 88.1 |
| 10/16/2013 | 12:31:40 | 87.7 |
| 10/16/2013 | 12:32:41 | 84.8 |
| 10/16/2013 | 12:33:41 | 79.7 |
| 10/16/2013 | 12:34:41 | 82.4 |
| 10/16/2013 | 12:35:41 | 85.7 |
| 10/16/2013 | 12:36:40 | 87.6 |
| 10/16/2013 | 12:37:40 | 84.7 |
| 10/16/2013 | 12:38:40 | 60.6 |
| 10/16/2013 | 12:39:41 | 59.6 |
| 10/16/2013 | 12:40:41 | 73.9 |
| 10/16/2013 | 12:41:41 | 76.5 |
| 10/16/2013 | 12:42:41 | 79.2 |
| 10/16/2013 | 12:43:42 | 80.6 |
| 10/16/2013 | 12:44:40 | 80   |
| 10/16/2013 | 12:45:40 | 73.8 |
| 10/16/2013 | 12:46:41 | 68.4 |

|                 |            |       |
|-----------------|------------|-------|
| 10/16/2013      | 12:47:41   | 70.9  |
| 10/16/2013      | 12:48:41   | 74.7  |
| 10/16/2013      | 12:49:41   | 75.5  |
| 10/16/2013      | 12:50:41   | 76.4  |
| 10/16/2013      | 12:51:40   | 78.9  |
| 10/16/2013      | 12:52:40   | 85    |
| 10/16/2013      | 12:53:40   | 89.5  |
| 10/16/2013      | 12:54:41   | 85.3  |
| 10/16/2013      | 12:55:41   | 84.6  |
| 10/16/2013      | 12:56:41   | 87.9  |
| 10/16/2013      | 12:57:41   | 96.6  |
| 10/16/2013      | 12:58:42   | 100.4 |
| 10/16/2013      | 12:59:40   | 100   |
| 10/16/2013      | 13:00:40   | 95.4  |
| 10/16/2013      | 13:01:40   | 97    |
| 10/16/2013      | 13:02:41   | 104.2 |
| 10/16/2013      | 13:03:41   | 106.8 |
| 10/16/2013      | 13:04:41   | 108   |
| 10/16/2013      | 13:05:42   | 100   |
| 10/16/2013      | 13:06:40   | 94.7  |
| Average         | 1820 sampl | 85.6  |
| Test Run 12 End |            |       |

Test Run 13 Begin. STRATA Version 3.2

Operator: DGG

Plant Name: Enviva Amory

Location: DHM Run 4

THC

ppm

Start Averaging

|            |          |       |
|------------|----------|-------|
| 10/16/2013 | 13:21:35 | 81.3  |
| 10/16/2013 | 13:22:35 | 90.1  |
| 10/16/2013 | 13:23:36 | 82.9  |
| 10/16/2013 | 13:24:36 | 76.5  |
| 10/16/2013 | 13:25:36 | 93.5  |
| 10/16/2013 | 13:26:36 | 109.2 |
| 10/16/2013 | 13:27:35 | 116   |
| 10/16/2013 | 13:28:35 | 111.4 |
| 10/16/2013 | 13:29:35 | 111.3 |
| 10/16/2013 | 13:30:35 | 103.7 |
| 10/16/2013 | 13:31:36 | 107.3 |
| 10/16/2013 | 13:32:36 | 107.4 |
| 10/16/2013 | 13:33:36 | 111.1 |
| 10/16/2013 | 13:34:36 | 113.2 |
| 10/16/2013 | 13:35:35 | 117.8 |
| 10/16/2013 | 13:36:35 | 118.7 |
| 10/16/2013 | 13:37:35 | 118.1 |
| 10/16/2013 | 13:38:35 | 117.6 |
| 10/16/2013 | 13:39:36 | 122.1 |
| 10/16/2013 | 13:40:36 | 118   |
| 10/16/2013 | 13:41:36 | 105.1 |
| 10/16/2013 | 13:42:36 | 100.8 |
| 10/16/2013 | 13:43:35 | 93.8  |
| 10/16/2013 | 13:44:35 | 87.8  |
| 10/16/2013 | 13:45:35 | 79.1  |
| 10/16/2013 | 13:46:35 | 73.2  |
| 10/16/2013 | 13:47:36 | 67.9  |
| 10/16/2013 | 13:48:36 | 66.4  |
| 10/16/2013 | 13:49:36 | 67.9  |
| 10/16/2013 | 13:50:34 | 71.2  |
| 10/16/2013 | 13:51:35 | 72.9  |
| 10/16/2013 | 13:52:35 | 77.4  |
| 10/16/2013 | 13:53:35 | 76.7  |
| 10/16/2013 | 13:54:36 | 71.8  |
| 10/16/2013 | 13:55:36 | 68.2  |
| 10/16/2013 | 13:56:36 | 66.4  |
| 10/16/2013 | 13:57:36 | 66.5  |
| 10/16/2013 | 13:58:35 | 69.6  |
| 10/16/2013 | 13:59:35 | 71.7  |
| 10/16/2013 | 14:00:35 | 71.6  |

|                 |            |      |
|-----------------|------------|------|
| 10/16/2013      | 14:01:35   | 67.6 |
| 10/16/2013      | 14:02:36   | 63   |
| 10/16/2013      | 14:03:36   | 70.8 |
| 10/16/2013      | 14:04:36   | 75.9 |
| 10/16/2013      | 14:05:34   | 79   |
| 10/16/2013      | 14:06:35   | 82.1 |
| 10/16/2013      | 14:07:35   | 82.3 |
| 10/16/2013      | 14:08:35   | 83.2 |
| 10/16/2013      | 14:09:36   | 83.4 |
| 10/16/2013      | 14:10:36   | 81.3 |
| 10/16/2013      | 14:11:36   | 76.7 |
| 10/16/2013      | 14:12:36   | 76.3 |
| 10/16/2013      | 14:13:35   | 80.1 |
| 10/16/2013      | 14:14:35   | 84   |
| 10/16/2013      | 14:15:35   | 87.6 |
| 10/16/2013      | 14:16:35   | 86.6 |
| 10/16/2013      | 14:17:36   | 87.3 |
| 10/16/2013      | 14:18:36   | 85.2 |
| 10/16/2013      | 14:19:36   | 82.5 |
| 10/16/2013      | 14:20:34   | 85.2 |
| Average         | 1804 sampl | 87.6 |
| Test Run 13 End |            |      |

Enviva - Amory  
Run 1

Date: 14-Oct  
Run Time: 1515-1615

| Parameter | Symbol | Dryer Stack                             |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

| Analyzer Calibration Error - Calibration Standards |                      |       |
|----------------------------------------------------|----------------------|-------|
| Zero Gas                                           | $C_{v, \text{zero}}$ | 0.0   |
| Low-Level Gas                                      | $C_{v, \text{low}}$  | 27.99 |
| Mid-Level Gas                                      | $C_{v, \text{mid}}$  | 50    |
| High-Level Gas                                     | $C_{v, \text{high}}$ | 86.13 |
| Calibration Span                                   | CS                   | 100   |

| Analyzer Calibration Error - Instrument Response |                        |       |
|--------------------------------------------------|------------------------|-------|
| Zero Gas                                         | $C_{Dir, \text{zero}}$ | 0.1   |
| Low-Level Gas                                    | $C_{Dir, \text{low}}$  | 28.3  |
| Mid-Level Gas                                    | $C_{Dir, \text{mid}}$  | 50.12 |
| High-Level Gas                                   | $C_{Dir, \text{high}}$ | 86.2  |

1415

| Analyzer Calibration Error - Results (Percent of Span) |                     |     |
|--------------------------------------------------------|---------------------|-----|
| Zero Gas                                               | $ACE_{\text{zero}}$ | 0.1 |
| Low-Level Gas                                          | $ACE_{\text{low}}$  | 1.1 |
| Mid-Level Gas                                          | $ACE_{\text{mid}}$  | 0.2 |
| High-Level Gas                                         | $ACE_{\text{high}}$ | 0.1 |
| Specification                                          | $ACE_{\text{spec}}$ | ±5  |

| System Calibrations - Instrument Response |                             |       |
|-------------------------------------------|-----------------------------|-------|
| Initial Zero                              | $C_{s, \text{zero (pre)}}$  | 0.1   |
| Final Zero                                | $C_{s, \text{zero (post)}}$ | 0.24  |
| Upscale Gas Standard                      | $C_{MA}$                    | 50.0  |
| Initial Upscale                           | $C_{v, \text{up (pre)}}$    | 50.12 |
| Final Upscale                             | $C_{v, \text{up (post)}}$   | 50.1  |

| System Bias - Results (Percent) |                                     |     |
|---------------------------------|-------------------------------------|-----|
| Zero (pre)                      | $SB_{i(\text{zero})}$               | 0.0 |
| Zero (post)                     | $SB_{\text{final}(\text{zero})}$    | 0.1 |
| Upscale (pre)                   | $SB_{i(\text{upscale})}$            | 0.0 |
| Upscale (post)                  | $SB_{\text{final}(\text{upscale})}$ | 0.0 |
| Specification                   | $SB_{\text{spec}}$                  | NA  |

| System Drift - Results (Percent) |                      |     |
|----------------------------------|----------------------|-----|
| Zero                             | $D_{\text{zero}}$    | 0.1 |
| Upscale                          | $D_{\text{upscale}}$ | 0.0 |
| Specification                    | $D_{\text{spec}}$    | ±3  |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 30 |

| Calibration Correction |                  |      |
|------------------------|------------------|------|
| Raw Average            | $C_{\text{ave}}$ | 29.6 |
| Bias Average - Zero    | $C_0$            | N/A  |
| Bias Average - Upscale | $C_M$            | N/A  |
| Corrected Run Average  | $C_{\text{Gas}}$ | 29.6 |

Enviva - Amory  
Run 2

Date: 14-Oct  
Run Time: 1649-1749

| Parameter | Symbol | Dryer Stack                             |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

| Analyzer Calibration Error - Instrument Response |                 |      |
|--------------------------------------------------|-----------------|------|
| Zero Gas                                         | $C_{Dir, zero}$ | 0.1  |
| Low-Level Gas                                    | $C_{Dir, low}$  | 28.3 |
| Mid-Level Gas                                    | $C_{Dir, mid}$  | 50.1 |
| High-Level Gas                                   | $C_{Dir, high}$ | 86.2 |

| Analyzer Calibration Error - Results (Percent of Span) |              |     |
|--------------------------------------------------------|--------------|-----|
| Zero Gas                                               | $ACE_{zero}$ | 0.1 |
| Low-Level Gas                                          | $ACE_{low}$  | 1.1 |
| Mid-Level Gas                                          | $ACE_{mid}$  | 0.2 |
| High-Level Gas                                         | $ACE_{high}$ | 0.1 |
| Specification                                          | $ACE_{spec}$ | ±5  |

| System Calibrations - Instrument Response |                      |      |
|-------------------------------------------|----------------------|------|
| Initial Zero                              | $C_{s, zero (pre)}$  | 0.24 |
| Final Zero                                | $C_{s, zero (post)}$ | 0.3  |
| Upscale Gas Standard                      | $C_{MA}$             | 50.0 |
| Initial Upscale                           | $C_{v, up (pre)}$    | 50.1 |
| Final Upscale                             | $C_{v, up (post)}$   | 50.2 |

| System Bias - Results (Percent) |                        |     |
|---------------------------------|------------------------|-----|
| Zero (pre)                      | $SB_{i (zero)}$        | 0.1 |
| Zero (post)                     | $SB_{final (zero)}$    | 0.2 |
| Upscale (pre)                   | $SB_{i (upscale)}$     | 0.0 |
| Upscale (post)                  | $SB_{final (upscale)}$ | 0.1 |
| Specification                   | $SB_{spec}$            | NA  |

| System Drift - Results (Percent) |               |     |
|----------------------------------|---------------|-----|
| Zero                             | $D_{zero}$    | 0.1 |
| Upscale                          | $D_{upscale}$ | 0.1 |
| Specification                    | $D_{spec}$    | ±3  |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 30 |

| Calibration Correction |           |             |
|------------------------|-----------|-------------|
| Raw Average            | $C_{ave}$ | 21.88       |
| Bias Average - Zero    | $C_0$     | N/A         |
| Bias Average - Upscale | $C_M$     | N/A         |
| Corrected Run Average  | $C_{Gas}$ | <b>21.9</b> |



Enviva - Amory  
Run 3

Date: 14-Oct  
Run Time: 1758-1900  
paused for two minutes

| Parameter | Symbol | Dryer Stack                             |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

#### Analyzer Calibration Error - Instrument Response

|                |                 |      |
|----------------|-----------------|------|
| Zero Gas       | $C_{Dir, zero}$ | 0.1  |
| Low-Level Gas  | $C_{Dir, low}$  | 28.3 |
| Mid-Level Gas  | $C_{Dir, mid}$  | 50.1 |
| High-Level Gas | $C_{Dir, high}$ | 86.2 |

#### Analyzer Calibration Error - Results (Percent of Span)

|                |              |     |
|----------------|--------------|-----|
| Zero Gas       | $ACE_{zero}$ | 0.1 |
| Low-Level Gas  | $ACE_{low}$  | 1.1 |
| Mid-Level Gas  | $ACE_{mid}$  | 0.2 |
| High-Level Gas | $ACE_{high}$ | 0.1 |
| Specification  | $ACE_{spec}$ | ±5  |

#### System Calibrations - Instrument Response

|                      |                      |       |
|----------------------|----------------------|-------|
| Initial Zero         | $C_{s, zero (pre)}$  | 0.30  |
| Final Zero           | $C_{s, zero (post)}$ | 0.34  |
| Upscale Gas Standard | $C_{MA}$             | 50.0  |
| Initial Upscale      | $C_{v, up (pre)}$    | 50.2  |
| Final Upscale        | $C_{v, up (post)}$   | 50.18 |

#### System Bias - Results (Percent)

|                |                        |     |
|----------------|------------------------|-----|
| Zero (pre)     | $SB_i (zero)$          | 0.2 |
| Zero (post)    | $SB_{final} (zero)$    | 0.2 |
| Upscale (pre)  | $SB_i (upscale)$       | 0.1 |
| Upscale (post) | $SB_{final} (upscale)$ | 0.1 |
| Specification  | $SB_{spec}$            | NA  |

#### System Drift - Results (Percent)

|               |               |     |
|---------------|---------------|-----|
| Zero          | $D_{zero}$    | 0.0 |
| Upscale       | $D_{upscale}$ | 0.0 |
| Specification | $D_{spec}$    | ±3  |

#### Response Test - Results (seconds)

|               |  |    |
|---------------|--|----|
| Upscale Test  |  | NA |
| Zero Test     |  | NA |
| Response Time |  | 30 |

#### Calibration Correction

|                        |           |       |
|------------------------|-----------|-------|
| Raw Average            | $C_{ave}$ | 22.20 |
| Bias Average - Zero    | $C_0$     | N/A   |
| Bias Average - Upscale | $C_M$     | N/A   |
| Corrected Run Average  | $C_{Gas}$ | 22.2  |

Enviva - Amory  
Run 4

Date: 15-Oct  
Run Time: 0911-1011

| Parameter | Symbol | GHM                                     |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

| Analyzer Calibration Error - Calibration Standards |               |       |
|----------------------------------------------------|---------------|-------|
| Zero Gas                                           | $C_{v, zero}$ | 0.0   |
| Low-Level Gas                                      | $C_{v, low}$  | 27.99 |
| Mid-Level Gas                                      | $C_{v, mid}$  | 50    |
| High-Level Gas                                     | $C_{v, high}$ | 86.13 |
| Calibration Span                                   | CS            | 100   |

| Analyzer Calibration Error - Instrument Response |                 |       |
|--------------------------------------------------|-----------------|-------|
| Zero Gas                                         | $C_{Dir, zero}$ | 0.1   |
| Low-Level Gas                                    | $C_{Dir, low}$  | 27.65 |
| Mid-Level Gas                                    | $C_{Dir, mid}$  | 50    |
| High-Level Gas                                   | $C_{Dir, high}$ | 86.2  |

| Analyzer Calibration Error - Results (Percent of Span) |              |      |
|--------------------------------------------------------|--------------|------|
| Zero Gas                                               | $ACE_{zero}$ | 0.1  |
| Low-Level Gas                                          | $ACE_{low}$  | -1.2 |
| Mid-Level Gas                                          | $ACE_{mid}$  | 0.0  |
| High-Level Gas                                         | $ACE_{high}$ | 0.1  |
| Specification                                          | $ACE_{spec}$ | ±5   |

| System Calibrations - Instrument Response |                      |       |
|-------------------------------------------|----------------------|-------|
| Initial Zero                              | $C_{s, zero (pre)}$  | 0.1   |
| Final Zero                                | $C_{s, zero (post)}$ | 0.1   |
| Upscale Gas Standard                      | $C_{MA}$             | 50.0  |
| Initial Upscale                           | $C_{v, up (pre)}$    | 50    |
| Final Upscale                             | $C_{v, up (post)}$   | 50.08 |

| System Bias - Results (Percent) |                        |     |
|---------------------------------|------------------------|-----|
| Zero (pre)                      | $SB_{i (zero)}$        | 0.0 |
| Zero (post)                     | $SB_{final (zero)}$    | 0.0 |
| Upscale (pre)                   | $SB_{i (upscale)}$     | 0.0 |
| Upscale (post)                  | $SB_{final (upscale)}$ | 0.1 |
| Specification                   | $SB_{spec}$            | NA  |

| System Drift - Results (Percent) |               |     |
|----------------------------------|---------------|-----|
| Zero                             | $D_{zero}$    | 0.0 |
| Upscale                          | $D_{upscale}$ | 0.1 |
| Specification                    | $D_{spec}$    | ±3  |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 30 |

| Calibration Correction |           |      |
|------------------------|-----------|------|
| Raw Average            | $C_{ave}$ | 17.5 |
| Bias Average - Zero    | $C_0$     | N/A  |
| Bias Average - Upscale | $C_M$     | N/A  |
| Corrected Run Average  | $C_{Gas}$ | 17.5 |

Enviva - Amory  
Run 5

Date: 15-Oct  
Run Time: 1022-1122

| Parameter | Symbol | GHM                                     |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

| Analyzer Calibration Error - Instrument Response |                 |      |
|--------------------------------------------------|-----------------|------|
| Zero Gas                                         | $C_{Dir, zero}$ | 0.1  |
| Low-Level Gas                                    | $C_{Dir, low}$  | 27.7 |
| Mid-Level Gas                                    | $C_{Dir, mid}$  | 50.0 |
| High-Level Gas                                   | $C_{Dir, high}$ | 86.2 |

| Analyzer Calibration Error - Results (Percent of Span) |              |      |
|--------------------------------------------------------|--------------|------|
| Zero Gas                                               | $ACE_{zero}$ | 0.1  |
| Low-Level Gas                                          | $ACE_{low}$  | -1.2 |
| Mid-Level Gas                                          | $ACE_{mid}$  | 0.0  |
| High-Level Gas                                         | $ACE_{high}$ | 0.1  |
| Specification                                          | $ACE_{spec}$ | ±5   |

| System Calibrations - Instrument Response |                      |       |
|-------------------------------------------|----------------------|-------|
| Initial Zero                              | $C_{s, zero (pre)}$  | 0.10  |
| Final Zero                                | $C_{s, zero (post)}$ | -0.05 |
| Upscale Gas Standard                      | $C_{MA}$             | 50.0  |
| Initial Upscale                           | $C_{v, up (pre)}$    | 50.08 |
| Final Upscale                             | $C_{v, up (post)}$   | 50.54 |

| System Bias - Results (Percent) |                        |      |
|---------------------------------|------------------------|------|
| Zero (pre)                      | $SB_{i (zero)}$        | 0.0  |
| Zero (post)                     | $SB_{final (zero)}$    | -0.2 |
| Upscale (pre)                   | $SB_{i (upscale)}$     | 0.1  |
| Upscale (post)                  | $SB_{final (upscale)}$ | 0.5  |
| Specification                   | $SB_{spec}$            | NA   |

| System Drift - Results (Percent) |               |      |
|----------------------------------|---------------|------|
| Zero                             | $D_{zero}$    | -0.2 |
| Upscale                          | $D_{upscale}$ | 0.5  |
| Specification                    | $D_{spec}$    | ±3   |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 30 |

| Calibration Correction |           |       |
|------------------------|-----------|-------|
| Raw Average            | $C_{ave}$ | 21.19 |
| Bias Average - Zero    | $C_0$     | N/A   |
| Bias Average - Upscale | $C_M$     | N/A   |
| Corrected Run Average  | $C_{Gas}$ | 21.2  |

Enviva - Amory  
Run 6

Date: 15-Oct  
Run Time: 1140-1240

| Parameter | Symbol | GHM                                     |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

| Analyzer Calibration Error - Instrument Response |                 |       |
|--------------------------------------------------|-----------------|-------|
| Zero Gas                                         | $C_{Dir, zero}$ | 0.1   |
| Low-Level Gas                                    | $C_{Dir, low}$  | 27.65 |
| Mid-Level Gas                                    | $C_{Dir, mid}$  | 50.0  |
| High-Level Gas                                   | $C_{Dir, high}$ | 86.2  |

| Analyzer Calibration Error - Results (Percent of Span) |              |      |
|--------------------------------------------------------|--------------|------|
| Zero Gas                                               | $ACE_{zero}$ | 0.1  |
| Low-Level Gas                                          | $ACE_{low}$  | -1.2 |
| Mid-Level Gas                                          | $ACE_{mid}$  | 0.0  |
| High-Level Gas                                         | $ACE_{high}$ | 0.1  |
| Specification                                          | $ACE_{spec}$ | ±5   |

| System Calibrations - Instrument Response |                      |       |
|-------------------------------------------|----------------------|-------|
| Initial Zero                              | $C_{s, zero (pre)}$  | -0.05 |
| Final Zero                                | $C_{s, zero (post)}$ | 0.05  |
| Upscale Gas Standard                      | $C_{MA}$             | 50.0  |
| Initial Upscale                           | $C_{v, up (pre)}$    | 50.54 |
| Final Upscale                             | $C_{v, up (post)}$   | 50.25 |

| System Bias - Results (Percent) |                        |      |
|---------------------------------|------------------------|------|
| Zero (pre)                      | $SB_i (zero)$          | -0.2 |
| Zero (post)                     | $SB_{final} (zero)$    | -0.1 |
| Upscale (pre)                   | $SB_i (upscale)$       | 0.5  |
| Upscale (post)                  | $SB_{final} (upscale)$ | 0.3  |
| Specification                   | $SB_{spec}$            | NA   |

| System Drift - Results (Percent) |               |      |
|----------------------------------|---------------|------|
| Zero                             | $D_{zero}$    | 0.1  |
| Upscale                          | $D_{upscale}$ | -0.3 |
| Specification                    | $D_{spec}$    | ±3   |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 30 |

| Calibration Correction |           |             |
|------------------------|-----------|-------------|
| Raw Average            | $C_{ave}$ | 27.22       |
| Bias Average - Zero    | $C_0$     | N/A         |
| Bias Average - Upscale | $C_M$     | N/A         |
| Corrected Run Average  | $C_{Gas}$ | <b>27.2</b> |

Enviva - Amory  
Run 8

Date: 15-Oct  
Run Time: 1736-1836

| Parameter | Symbol | Aspirator                               |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

| Analyzer Calibration Error - Calibration Standards |               |       |
|----------------------------------------------------|---------------|-------|
| Zero Gas                                           | $C_{v, zero}$ | 0.0   |
| Low-Level Gas                                      | $C_{v, low}$  | 258.1 |
| Mid-Level Gas                                      | $C_{v, mid}$  | 507.1 |
| High-Level Gas                                     | $C_{v, high}$ | 836.9 |
| Calibration Span                                   | CS            | 1000  |

| Analyzer Calibration Error - Instrument Response |                 |       |
|--------------------------------------------------|-----------------|-------|
| Zero Gas                                         | $C_{Dir, zero}$ | 0.4   |
| Low-Level Gas                                    | $C_{Dir, low}$  | 259   |
| Mid-Level Gas                                    | $C_{Dir, mid}$  | 506.1 |
| High-Level Gas                                   | $C_{Dir, high}$ | 837   |

1650

| Analyzer Calibration Error - Results (Percent of Span) |              |      |
|--------------------------------------------------------|--------------|------|
| Zero Gas                                               | $ACE_{zero}$ | 0.0  |
| Low-Level Gas                                          | $ACE_{low}$  | 0.3  |
| Mid-Level Gas                                          | $ACE_{mid}$  | -0.2 |
| High-Level Gas                                         | $ACE_{high}$ | 0.0  |
| Specification                                          | $ACE_{spec}$ | ±5   |

| System Calibrations - Instrument Response |                      |       |
|-------------------------------------------|----------------------|-------|
| Initial Zero                              | $C_{s, zero (pre)}$  | 0.4   |
| Final Zero                                | $C_{s, zero (post)}$ | 1.2   |
| Upscale Gas Standard                      | $C_{MA}$             | 507.1 |
| Initial Upscale                           | $C_{v, up (pre)}$    | 506.1 |
| Final Upscale                             | $C_{v, up (post)}$   | 507.5 |

| System Bias - Results (Percent) |                        |     |
|---------------------------------|------------------------|-----|
| Zero (pre)                      | $SB_i (zero)$          | 0.0 |
| Zero (post)                     | $SB_{final} (zero)$    | 0.1 |
| Upscale (pre)                   | $SB_i (upscale)$       | 0.0 |
| Upscale (post)                  | $SB_{final} (upscale)$ | 0.1 |
| Specification                   | $SB_{spec}$            | NA  |

| System Drift - Results (Percent) |               |     |
|----------------------------------|---------------|-----|
| Zero                             | $D_{zero}$    | 0.1 |
| Upscale                          | $D_{upscale}$ | 0.1 |
| Specification                    | $D_{spec}$    | ±3  |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 30 |

| Calibration Correction |           |       |
|------------------------|-----------|-------|
| Raw Average            | $C_{ave}$ | 347.8 |
| Bias Average - Zero    | $C_0$     | N/A   |
| Bias Average - Upscale | $C_M$     | N/A   |
| Corrected Run Average  | $C_{Gas}$ | 347.8 |

Enviva - Amory  
Run 9

Date: 15-Oct  
Run Time: 1849-1949

| Parameter | Symbol | Aspirator                               |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

| Analyzer Calibration Error - Instrument Response |                 |       |
|--------------------------------------------------|-----------------|-------|
| Zero Gas                                         | $C_{Dir, zero}$ | 0.4   |
| Low-Level Gas                                    | $C_{Dir, low}$  | 259.0 |
| Mid-Level Gas                                    | $C_{Dir, mid}$  | 506.1 |
| High-Level Gas                                   | $C_{Dir, high}$ | 837.0 |

| Analyzer Calibration Error - Results (Percent of Span) |              |      |
|--------------------------------------------------------|--------------|------|
| Zero Gas                                               | $ACE_{zero}$ | 0.0  |
| Low-Level Gas                                          | $ACE_{low}$  | 0.3  |
| Mid-Level Gas                                          | $ACE_{mid}$  | -0.2 |
| High-Level Gas                                         | $ACE_{high}$ | 0.0  |
| Specification                                          | $ACE_{spec}$ | ±5   |

| System Calibrations - Instrument Response |                      |       |
|-------------------------------------------|----------------------|-------|
| Initial Zero                              | $C_{s, zero (pre)}$  | 1.20  |
| Final Zero                                | $C_{s, zero (post)}$ | 1.35  |
| Upscale Gas Standard                      | $C_{MA}$             | 507.1 |
| Initial Upscale                           | $C_{v, up (pre)}$    | 507.5 |
| Final Upscale                             | $C_{v, up (post)}$   | 507.9 |

| System Bias - Results (Percent) |                        |     |
|---------------------------------|------------------------|-----|
| Zero (pre)                      | $SB_{i (zero)}$        | 0.1 |
| Zero (post)                     | $SB_{final (zero)}$    | 0.1 |
| Upscale (pre)                   | $SB_{i (upscale)}$     | 0.1 |
| Upscale (post)                  | $SB_{final (upscale)}$ | 0.2 |
| Specification                   | $SB_{spec}$            | NA  |

| System Drift - Results (Percent) |               |     |
|----------------------------------|---------------|-----|
| Zero                             | $D_{zero}$    | 0.0 |
| Upscale                          | $D_{upscale}$ | 0.0 |
| Specification                    | $D_{spec}$    | ±3  |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 30 |

| Calibration Correction |           |              |
|------------------------|-----------|--------------|
| Raw Average            | $C_{ave}$ | 380.40       |
| Bias Average - Zero    | $C_0$     | N/A          |
| Bias Average - Upscale | $C_M$     | N/A          |
| Corrected Run Average  | $C_{Gas}$ | <b>380.4</b> |

Enviva - Amory  
Run 10

Date: 15-Oct  
Run Time: 2000-2100

| Parameter | Symbol | Aspirator                               |
|-----------|--------|-----------------------------------------|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |
|           |        | ppm <sub>w</sub>                        |

| Analyzer Calibration Error - Instrument Response |                 |       |
|--------------------------------------------------|-----------------|-------|
| Zero Gas                                         | $C_{Dir, zero}$ | 0.4   |
| Low-Level Gas                                    | $C_{Dir, low}$  | 259.0 |
| Mid-Level Gas                                    | $C_{Dir, mid}$  | 506.1 |
| High-Level Gas                                   | $C_{Dir, high}$ | 837.0 |

| Analyzer Calibration Error - Results (Percent of Span) |              |      |
|--------------------------------------------------------|--------------|------|
| Zero Gas                                               | $ACE_{zero}$ | 0.0  |
| Low-Level Gas                                          | $ACE_{low}$  | 0.3  |
| Mid-Level Gas                                          | $ACE_{mid}$  | -0.2 |
| High-Level Gas                                         | $ACE_{high}$ | 0.0  |
| Specification                                          | $ACE_{spec}$ | ±5   |

| System Calibrations - Instrument Response |                      |       |
|-------------------------------------------|----------------------|-------|
| Initial Zero                              | $C_{s, zero (pre)}$  | 1.35  |
| Final Zero                                | $C_{s, zero (post)}$ | 1     |
| Upscale Gas Standard                      | $C_{MA}$             | 507.1 |
| Initial Upscale                           | $C_{v, up (pre)}$    | 507.9 |
| Final Upscale                             | $C_{v, up (post)}$   | 508.2 |

| System Bias - Results (Percent) |                        |     |
|---------------------------------|------------------------|-----|
| Zero (pre)                      | $SB_{i (zero)}$        | 0.1 |
| Zero (post)                     | $SB_{final (zero)}$    | 0.1 |
| Upscale (pre)                   | $SB_{i (upscale)}$     | 0.2 |
| Upscale (post)                  | $SB_{final (upscale)}$ | 0.2 |
| Specification                   | $SB_{spec}$            | NA  |

| System Drift - Results (Percent) |               |     |
|----------------------------------|---------------|-----|
| Zero                             | $D_{zero}$    | 0.0 |
| Upscale                          | $D_{upscale}$ | 0.0 |
| Specification                    | $D_{spec}$    | ±3  |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 30 |

| Calibration Correction |           |              |
|------------------------|-----------|--------------|
| Raw Average            | $C_{ave}$ | 278.30       |
| Bias Average - Zero    | $C_0$     | N/A          |
| Bias Average - Upscale | $C_M$     | N/A          |
| Corrected Run Average  | $C_{Gas}$ | <b>278.3</b> |

Enviva - Amory  
Run 7

Date: 15-Oct  
Run Time: 1348-1448

| Parameter | Symbol | Dry Hammermill                          |  |
|-----------|--------|-----------------------------------------|--|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |  |
|           |        | ppm <sub>w</sub>                        |  |

#### Analyzer Calibration Error - Calibration Standards

|                  |                      |       |       |
|------------------|----------------------|-------|-------|
| Zero Gas         | $C_{v, \text{zero}}$ | 0.0   | 0.0   |
| Low-Level Gas    | $C_{v, \text{low}}$  | 27.99 | 258.1 |
| Mid-Level Gas    | $C_{v, \text{mid}}$  | 50    | 507.1 |
| High-Level Gas   | $C_{v, \text{high}}$ | 86.13 | 836.9 |
| Calibration Span | CS                   | 100   | 1000  |

#### Analyzer Calibration Error - Instrument Response

|                |                        |       |        |
|----------------|------------------------|-------|--------|
| Zero Gas       | $C_{Dir, \text{zero}}$ | 0.1   | 0.1    |
| Low-Level Gas  | $C_{Dir, \text{low}}$  | 28.1  | 258.6  |
| Mid-Level Gas  | $C_{Dir, \text{mid}}$  | 50.24 | 507.78 |
| High-Level Gas | $C_{Dir, \text{high}}$ | 86.45 | 836.8  |

#### Analyzer Calibration Error - Results (Percent of Span)

|                |                     |     |     |
|----------------|---------------------|-----|-----|
| Zero Gas       | $ACE_{\text{zero}}$ | 0.1 | 0.0 |
| Low-Level Gas  | $ACE_{\text{low}}$  | 0.4 | 0.2 |
| Mid-Level Gas  | $ACE_{\text{mid}}$  | 0.5 | 0.1 |
| High-Level Gas | $ACE_{\text{high}}$ | 0.3 | 0.0 |
| Specification  | $ACE_{\text{spec}}$ | ±5  | ±5  |

#### System Calibrations - Instrument Response

|                      |                             |       |        |
|----------------------|-----------------------------|-------|--------|
| Initial Zero         | $C_{s, \text{zero (pre)}}$  | 0.1   | 0.1    |
| Final Zero           | $C_{s, \text{zero (post)}}$ | 0.15  | 0.15   |
| Upscale Gas Standard | $C_{MA}$                    | 50.0  | 507.1  |
| Initial Upscale      | $C_{v, \text{up (pre)}}$    | 50.24 | 507.78 |
| Final Upscale        | $C_{v, \text{up (post)}}$   | 50.55 | 508    |

#### System Bias - Results (Percent)

|                |                               |     |     |
|----------------|-------------------------------|-----|-----|
| Zero (pre)     | $SB_{i, \text{(zero)}}$       | 0.0 | 0.0 |
| Zero (post)    | $SB_{\text{final (zero)}}$    | 0.1 | 0.0 |
| Upscale (pre)  | $SB_{i, \text{(upscale)}}$    | 0.0 | 0.0 |
| Upscale (post) | $SB_{\text{final (upscale)}}$ | 0.3 | 0.0 |
| Specification  | $SB_{\text{spec}}$            | NA  | NA  |

#### System Drift - Results (Percent)

|               |                      |     |     |
|---------------|----------------------|-----|-----|
| Zero          | $D_{\text{zero}}$    | 0.1 | 0.0 |
| Upscale       | $D_{\text{upscale}}$ | 0.3 | 0.0 |
| Specification | $D_{\text{spec}}$    | ±3  | ±3  |

#### Response Test - Results (seconds)

|               |  |    |
|---------------|--|----|
| Upscale Test  |  | NA |
| Zero Test     |  | NA |
| Response Time |  | 30 |

#### Calibration Correction

|                        |                  |       |
|------------------------|------------------|-------|
| Raw Average            | $C_{\text{ave}}$ | 117.9 |
| Bias Average - Zero    | $C_0$            | N/A   |
| Bias Average - Upscale | $C_M$            | N/A   |
| Corrected Run Average  | $C_{\text{Gas}}$ | 117.9 |



| Parameter | Symbol | Dry Hammermill                          |  |
|-----------|--------|-----------------------------------------|--|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |  |
|           |        | ppm <sub>w</sub>                        |  |

| Analyzer Calibration Error - Calibration Standards |                      |       |        |
|----------------------------------------------------|----------------------|-------|--------|
| Zero Gas                                           | $C_{v, \text{zero}}$ | 0.0   | 0.0    |
| Low-Level Gas                                      | $C_{v, \text{low}}$  | 28.0  | 258.1  |
| Mid-Level Gas                                      | $C_{v, \text{mid}}$  | 50.0  | 507.1  |
| High-Level Gas                                     | $C_{v, \text{high}}$ | 86.1  | 836.9  |
| Calibration Span                                   | CS                   | 100.0 | 1000.0 |

| Analyzer Calibration Error - Instrument Response |                        |      |       |
|--------------------------------------------------|------------------------|------|-------|
| Zero Gas                                         | $C_{Dir, \text{zero}}$ | 0.1  | 0.1   |
| Low-Level Gas                                    | $C_{Dir, \text{low}}$  | 28.3 | 259.0 |
| Mid-Level Gas                                    | $C_{Dir, \text{mid}}$  | 50.5 | 508.0 |
| High-Level Gas                                   | $C_{Dir, \text{high}}$ | 86.6 | 837.0 |

| Analyzer Calibration Error - Results (Percent of Span) |                     |     |     |
|--------------------------------------------------------|---------------------|-----|-----|
| Zero Gas                                               | $ACE_{\text{zero}}$ | 0.1 | 0.0 |
| Low-Level Gas                                          | $ACE_{\text{low}}$  | 1.1 | 0.3 |
| Mid-Level Gas                                          | $ACE_{\text{mid}}$  | 1.0 | 0.2 |
| High-Level Gas                                         | $ACE_{\text{high}}$ | 0.5 | 0.0 |
| Specification                                          | $ACE_{\text{spec}}$ | ±5  | ±5  |

| System Calibrations - Instrument Response |                             |       |       |
|-------------------------------------------|-----------------------------|-------|-------|
| Initial Zero                              | $C_{s, \text{zero (pre)}}$  | 0.10  | 0.10  |
| Final Zero                                | $C_{s, \text{zero (post)}}$ | -0.1  | -0.1  |
| Upscale Gas Standard                      | $C_{MA}$                    | 50.0  | 507.1 |
| Initial Upscale                           | $C_{v, \text{up (pre)}}$    | 50.5  | 508   |
| Final Upscale                             | $C_{v, \text{up (post)}}$   | 50.78 | 508.5 |

| System Bias - Results (Percent) |                               |      |     |
|---------------------------------|-------------------------------|------|-----|
| Zero (pre)                      | $SB_{i \text{ (zero)}}$       | 0.0  | 0.0 |
| Zero (post)                     | $SB_{\text{final (zero)}}$    | -0.2 | 0.0 |
| Upscale (pre)                   | $SB_{i \text{ (upscale)}}$    | 0.0  | 0.0 |
| Upscale (post)                  | $SB_{\text{final (upscale)}}$ | 0.3  | 0.1 |
| Specification                   | $SB_{\text{spec}}$            | NA   | NA  |

| System Drift - Results (Percent) |                      |      |     |
|----------------------------------|----------------------|------|-----|
| Zero                             | $D_{\text{zero}}$    | -0.2 | 0.0 |
| Upscale                          | $D_{\text{upscale}}$ | 0.3  | 0.1 |
| Specification                    | $D_{\text{spec}}$    | ±3   | ±3  |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 30 |

| Calibration Correction |                  |             |
|------------------------|------------------|-------------|
| Raw Average            | $C_{\text{ave}}$ | 80.30       |
| Bias Average - Zero    | $C_0$            | N/A         |
| Bias Average - Upscale | $C_M$            | N/A         |
| Corrected Run Average  | $C_{\text{Gas}}$ | <b>80.3</b> |

| Parameter | Symbol | Dry Hammermill                          |  |
|-----------|--------|-----------------------------------------|--|
|           |        | THC (as C <sub>3</sub> H <sub>8</sub> ) |  |
|           |        | ppm <sub>w</sub>                        |  |

| Analyzer Calibration Error - Calibration Standards |                      |       |        |
|----------------------------------------------------|----------------------|-------|--------|
| Zero Gas                                           | $C_{v, \text{zero}}$ | 0.0   | 0.0    |
| Low-Level Gas                                      | $C_{v, \text{low}}$  | 28.0  | 258.1  |
| Mid-Level Gas                                      | $C_{v, \text{mid}}$  | 50.0  | 507.1  |
| High-Level Gas                                     | $C_{v, \text{high}}$ | 86.1  | 836.9  |
| Calibration Span                                   | CS                   | 100.0 | 1000.0 |

| Analyzer Calibration Error - Instrument Response |                        |      |       |
|--------------------------------------------------|------------------------|------|-------|
| Zero Gas                                         | $C_{Dir, \text{zero}}$ | 0.1  | 0.1   |
| Low-Level Gas                                    | $C_{Dir, \text{low}}$  | 28.3 | 259.0 |
| Mid-Level Gas                                    | $C_{Dir, \text{mid}}$  | 50.5 | 508.0 |
| High-Level Gas                                   | $C_{Dir, \text{high}}$ | 86.6 | 837.0 |

| Analyzer Calibration Error - Results (Percent of Span) |                     |     |     |
|--------------------------------------------------------|---------------------|-----|-----|
| Zero Gas                                               | $ACE_{\text{zero}}$ | 0.1 | 0.0 |
| Low-Level Gas                                          | $ACE_{\text{low}}$  | 1.1 | 0.3 |
| Mid-Level Gas                                          | $ACE_{\text{mid}}$  | 1.0 | 0.2 |
| High-Level Gas                                         | $ACE_{\text{high}}$ | 0.5 | 0.0 |
| Specification                                          | $ACE_{\text{spec}}$ | ±5  | ±5  |

| System Calibrations - Instrument Response |                             |       |       |
|-------------------------------------------|-----------------------------|-------|-------|
| Initial Zero                              | $C_{s, \text{zero (pre)}}$  | -0.10 | -0.10 |
| Final Zero                                | $C_{s, \text{zero (post)}}$ | 0.1   | 0.1   |
| Upscale Gas Standard                      | $C_{MA}$                    | 50.0  | 507.1 |
| Initial Upscale                           | $C_{v, \text{up (pre)}}$    | 50.78 | 508.5 |
| Final Upscale                             | $C_{v, \text{up (post)}}$   | 50.7  | 508   |

| System Bias - Results (Percent) |                               |      |     |
|---------------------------------|-------------------------------|------|-----|
| Zero (pre)                      | $SB_{I (\text{zero})}$        | -0.2 | 0.0 |
| Zero (post)                     | $SB_{\text{final (zero)}}$    | 0.0  | 0.0 |
| Upscale (pre)                   | $SB_{I (\text{upscale})}$     | 0.3  | 0.1 |
| Upscale (post)                  | $SB_{\text{final (upscale)}}$ | 0.2  | 0.0 |
| Specification                   | $SB_{\text{spec}}$            | NA   | NA  |

| System Drift - Results (Percent) |                      |      |      |
|----------------------------------|----------------------|------|------|
| Zero                             | $D_{\text{zero}}$    | 0.2  | 0.0  |
| Upscale                          | $D_{\text{upscale}}$ | -0.1 | -0.1 |
| Specification                    | $D_{\text{spec}}$    | ±3   | ±3   |

| Response Test - Results (seconds) |  |    |
|-----------------------------------|--|----|
| Upscale Test                      |  | NA |
| Zero Test                         |  | NA |
| Response Time                     |  | 30 |

| Calibration Correction |                  |             |
|------------------------|------------------|-------------|
| Raw Average            | $C_{\text{ave}}$ | 85.60       |
| Bias Average - Zero    | $C_0$            | N/A         |
| Bias Average - Upscale | $C_M$            | N/A         |
| Corrected Run Average  | $C_{\text{Gas}}$ | <b>85.6</b> |

Enviva - Amory  
Run 13

Date: 16-Oct  
Run Time: 1321-1421

| Parameter | Symbol | Dry Hammermill<br>THC (as C <sub>3</sub> H <sub>8</sub> )<br>ppm <sub>w</sub> |  |
|-----------|--------|-------------------------------------------------------------------------------|--|
|-----------|--------|-------------------------------------------------------------------------------|--|

| Analyzer Calibration Error - Calibration Standards |               |       |        |
|----------------------------------------------------|---------------|-------|--------|
| Zero Gas                                           | $C_{v, zero}$ | 0.0   | 0.0    |
| Low-Level Gas                                      | $C_{v, low}$  | 28.0  | 258.1  |
| Mid-Level Gas                                      | $C_{v, mid}$  | 50.0  | 507.1  |
| High-Level Gas                                     | $C_{v, high}$ | 86.1  | 836.9  |
| Calibration Span                                   | CS            | 100.0 | 1000.0 |

| Analyzer Calibration Error - Instrument Response |                 |      |       |
|--------------------------------------------------|-----------------|------|-------|
| Zero Gas                                         | $C_{Dir, zero}$ | 0.1  | 0.1   |
| Low-Level Gas                                    | $C_{Dir, low}$  | 28.3 | 259.0 |
| Mid-Level Gas                                    | $C_{Dir, mid}$  | 50.5 | 508.0 |
| High-Level Gas                                   | $C_{Dir, high}$ | 86.6 | 837.0 |

| Analyzer Calibration Error - Results (Percent of Span) |              |     |     |
|--------------------------------------------------------|--------------|-----|-----|
| Zero Gas                                               | $ACE_{zero}$ | 0.1 | 0.0 |
| Low-Level Gas                                          | $ACE_{low}$  | 1.1 | 0.3 |
| Mid-Level Gas                                          | $ACE_{mid}$  | 1.0 | 0.2 |
| High-Level Gas                                         | $ACE_{high}$ | 0.5 | 0.0 |
| Specification                                          | $ACE_{spec}$ | ±5  | ±5  |

| System Calibrations - Instrument Response |                      |       |        |
|-------------------------------------------|----------------------|-------|--------|
| Initial Zero                              | $C_{s, zero (pre)}$  | 0.10  | 0.10   |
| Final Zero                                | $C_{s, zero (post)}$ | 0.1   | 0.1    |
| Upscale Gas Standard                      | $C_{MA}$             | 0.0   | 507.1  |
| Initial Upscale                           | $C_{v, up (pre)}$    | 50.70 | 508.00 |
| Final Upscale                             | $C_{v, up (post)}$   | 50.6  | 508    |

| System Bias - Results (Percent) |                        |     |     |
|---------------------------------|------------------------|-----|-----|
| Zero (pre)                      | $SB_i (zero)$          | 0.0 | 0.0 |
| Zero (post)                     | $SB_{final} (zero)$    | 0.0 | 0.0 |
| Upscale (pre)                   | $SB_i (upscale)$       | 0.2 | 0.0 |
| Upscale (post)                  | $SB_{final} (upscale)$ | 0.1 | 0.0 |
| Specification                   | $SB_{spec}$            | NA  | NA  |

| System Drift - Results (Percent) |               |      |     |
|----------------------------------|---------------|------|-----|
| Zero                             | $D_{zero}$    | 0.0  | 0.0 |
| Upscale                          | $D_{upscale}$ | -0.1 | 0.0 |
| Specification                    | $D_{spec}$    | ±3   | ±3  |

| Response Test - Results (seconds) |  |    |    |
|-----------------------------------|--|----|----|
| Upscale Test                      |  | 0  | NA |
| Zero Test                         |  | 0  | NA |
| Response Time                     |  | 30 | 30 |

| Calibration Correction |           |       |  |
|------------------------|-----------|-------|--|
| Raw Average            | $C_{ave}$ | 87.60 |  |
| Bias Average - Zero    | $C_0$     | N/A   |  |
| Bias Average - Upscale | $C_M$     | N/A   |  |
| Corrected Run Average  | $C_{Gas}$ | 87.6  |  |

## **APPENDIX C**

### **Method 320 Data**

|                  |                |
|------------------|----------------|
| Company          | ACT            |
| Analyst Initials | STG            |
| Parameters       | EPA Method 320 |

|          |          |
|----------|----------|
| Client # | Amory    |
| Job #    | 0913-173 |
| sample # | 4        |

| Compound | Sample ID / Concentration (ppmv wet) |                   |                   |                 |           |           |
|----------|--------------------------------------|-------------------|-------------------|-----------------|-----------|-----------|
|          | Data Runs                            |                   |                   |                 |           |           |
|          | Dryer Stack Run 1                    | Dryer Stack Run 2 | Dryer Stack Run 3 | GHM Run 1       | GHM Run 2 | GHM Run 3 |
|          | Acrolein                             | 2.679 ND          | 2.679 ND          | 2.679 ND        | 2.679 ND  | 2.679 ND  |
|          | Formaldehyde                         | 0.725             | 0.507             | 0.647           | 0.205 ND  | 0.205 ND  |
|          | Methanol                             | 3.172             | 1.615             | 2.141           | 2.622     | 2.686     |
|          | Phenol                               | 3.648 ND          | 3.648 ND          | 3.648 ND        | 3.648 ND  | 3.648 ND  |
|          | Propionaldehyde                      | 0.558 ND          | 0.558 ND          | 0.558 ND        | 0.558 ND  | 0.558 ND  |
|          | acetaldehyde                         | 0.867 ND          | 0.867 ND          | 0.867 ND        | 0.867 ND  | 0.867 ND  |
|          |                                      |                   |                   |                 |           |           |
|          | Data Runs                            |                   |                   |                 |           |           |
|          | DHM Run 1                            | Aspirator Run 1   | Aspirator Run 2   | Aspirator Run 3 | DHM Run 2 | DHM Run 3 |
|          | Acrolein                             | 2.725 J           | 2.679 ND          | 2.679 ND        | 2.679 ND  | 2.679 J   |
|          | Formaldehyde                         | 0.205 ND          | 0.838             | 0.821           | 0.794     | 0.205 ND  |
|          | Methanol                             | 0.999             | 2.611             | 2.861           | 2.696     | 0.693     |
|          | Phenol                               | 3.648 ND          | 3.648 ND          | 3.648 ND        | 3.648 ND  | 3.648 ND  |
|          | Propionaldehyde                      | 0.558 ND          | 0.558 ND          | 0.558 ND        | 0.558 ND  | 0.558 ND  |
|          | acetaldehyde                         | 0.867 ND          | 0.867 ND          | 0.867 ND        | 0.867 ND  | 0.867 ND  |
|          |                                      |                   |                   |                 |           |           |
|          | Data Runs                            |                   |                   |                 |           |           |
|          | DHM Run 4                            |                   |                   |                 |           |           |
|          | Acrolein                             | 2.679 J           |                   |                 |           |           |
|          | Formaldehyde                         | 0.205 ND          |                   |                 |           |           |
|          | Methanol                             | 0.858             |                   |                 |           |           |
|          | Phenol                               | 3.648 ND          |                   |                 |           |           |

|                  |                |
|------------------|----------------|
| Company          | ACT            |
| Analyst Initials | STG            |
| Parameters       | EPA Method 320 |

|          |          |
|----------|----------|
| Client # | Amory    |
| Job #    | 0913-173 |
| sample # | 4        |

| Compound        | Sample ID / Concentration (ppmv wet) |
|-----------------|--------------------------------------|
| Propionaldehyde | 0.558 ND                             |
| acetaldehyde    | 0.867 ND                             |

|                  |                |
|------------------|----------------|
| Company          | ACT            |
| Analyst Initials | STG            |
| Parameters       | EPA Method 320 |

|          |          |
|----------|----------|
| Client # | Amory    |
| Job #    | 0913-173 |
| sample # | 4        |

# Minimum Detectable Concentrations

| Run                          | Average SEC | Acrolein (ppm) | Formaldehyde (ppm) | Methanol (ppm) | Phenol (ppm) | Propionaldehyde (ppm) | acetaldehyde (ppm) |
|------------------------------|-------------|----------------|--------------------|----------------|--------------|-----------------------|--------------------|
| Dryer Stack Run 1            |             | 1.788          | 0.097              | 0.283          | 2.150        | 0.164                 | 0.525              |
| Dryer Stack Run 2            |             | 1.686          | 0.094              | 0.251          | 1.936        | 0.157                 | 0.501              |
| Dryer Stack Run 3            |             | 1.795          | 0.099              | 0.281          | 2.206        | 0.164                 | 0.531              |
| GHM Run 1                    |             | 1.133          | 0.067              | 0.083          | 1.663        | 0.114                 | 0.350              |
| GHM Run 2                    |             | 1.130          | 0.067              | 0.085          | 1.708        | 0.115                 | 0.348              |
| GHM Run 3                    |             | 1.114          | 0.067              | 0.085          | 1.736        | 0.121                 | 0.345              |
| DHM Run 1                    |             | 1.074          | 0.083              | 0.079          | 1.544        | 0.246                 | 0.339              |
| Aspirator Run 1              |             | 1.476          | 0.182              | 0.139          | 2.029        | 0.674                 | 0.579              |
| Aspirator Run 2              |             | 1.465          | 0.201              | 0.152          | 1.986        | 0.752                 | 0.590              |
| Aspirator Run 3              |             | 1.446          | 0.158              | 0.129          | 1.982        | 0.552                 | 0.525              |
| DHM Run 2                    |             | 1.083          | 0.072              | 0.072          | 1.538        | 0.186                 | 0.330              |
| DHM Run 3                    |             | 1.090          | 0.073              | 0.075          | 1.580        | 0.190                 | 0.333              |
| DHM Run 4                    |             | 1.131          | 0.074              | 0.080          | 1.651        | 0.194                 | 0.339              |
| Average SEC over Runs (ppm): |             | 1.339          | 0.103              | 0.138          | 1.824        | 0.279                 | 0.433              |
| MDC(ppm):                    |             | 2.679          | 0.205              | 0.276          | 3.648        | 0.558                 | 0.867              |

|                  |                |
|------------------|----------------|
| Company          | ACT            |
| Analyst Initials | STG            |
| Parameters       | EPA Method 320 |

|          |          |
|----------|----------|
| Client # | Amory    |
| Job #    | 0913-173 |
| sample # | 4        |

## Data

### Sm --Spiked Data

| Date             | Method                | FileName             | Methanol (ppm) | SEC (ppm) | Sulfur_Hexafluoride (ppm) | SEC (ppm) |
|------------------|-----------------------|----------------------|----------------|-----------|---------------------------|-----------|
| 10/14/2013 13:54 | 0917-173_Non-Phenol_D | 13_10_14_1354_43_956 | 8.83           | 0.281     | 0.222                     | 0.01400   |
| 10/14/2013 13:55 | 0917-173_Non-Phenol_D | 13_10_14_1355_44_666 | 8.64           | 0.281     | 0.228                     | 0.01400   |
| 10/14/2013 13:56 | 0917-173_Non-Phenol_D | 13_10_14_1356_45_486 | 8.38           | 0.271     | 0.223                     | 0.01300   |
| 10/14/2013 13:57 | 0917-173_Non-Phenol_D | 13_10_14_1357_46_206 | 8.43           | 0.264     | 0.223                     | 0.01200   |
| 10/14/2013 13:58 | 0917-173_Non-Phenol_D | 13_10_14_1358_47_056 | 8.42           | 0.274     | 0.222                     | 0.01300   |
| 10/14/2013 13:59 | 0917-173_Non-Phenol_D | 13_10_14_1359_47_806 | 8.26           | 0.286     | 0.222                     | 0.01400   |
| 10/14/2013 14:00 | 0917-173_Non-Phenol_D | 13_10_14_1400_48_546 | 2.81           | 0.301     | 0.0340                    | 0.0150    |

Avg. Conc. (ppm)

**7.68**

**0.196**

### Su -- Native Conc. Of analyte

| Date             | Method                | FileName             | Methanol (ppm) | SEC (ppm) | Sulfur_Hexafluoride (ppm) | SEC (ppm) |
|------------------|-----------------------|----------------------|----------------|-----------|---------------------------|-----------|
| 10/14/2013 14:06 | 0917-173_Non-Phenol_D | 13_10_14_1406_53_137 | 1.51           | 0.310     | 0.0070                    | 0.0160    |
| 10/14/2013 14:07 | 0917-173_Non-Phenol_D | 13_10_14_1407_53_877 | 1.36           | 0.306     | 0.0030                    | 0.0160    |
| 10/14/2013 14:08 | 0917-173_Non-Phenol_D | 13_10_14_1408_54_687 | 1.39           | 0.305     | 0.0050                    | 0.0160    |
| 10/14/2013 14:09 | 0917-173_Non-Phenol_D | 13_10_14_1409_55_387 | 1.32           | 0.296     | 0.0080                    | 0.0150    |
| 10/14/2013 14:10 | 0917-173_Non-Phenol_D | 13_10_14_1410_56_217 | 1.34           | 0.286     | 0.0090                    | 0.0150    |
| 10/14/2013 14:11 | 0917-173_Non-Phenol_D | 13_10_14_1411_56_937 | 1.40           | 0.287     | 0.0030                    | 0.01400   |
| 10/14/2013 14:12 | 0917-173_Non-Phenol_D | 13_10_14_1412_57_727 | 1.41           | 0.294     | 0.00200                   | 0.0150    |

Avg. Conc. (ppm)

**1.39**

**0.0053**

$$\text{Recovery (\%)} = \frac{\text{Sm} - \text{Su}(1-\text{DF})}{\text{DF} \times \text{Cs}}$$

$$\text{Ce} = \text{DF} \times \text{Cs} + \text{Su}(1-\text{DF})$$

|    |          |                                      |
|----|----------|--------------------------------------|
| Sm | 7.68 ppm | Mean concentration of spiked analyte |
| Su | 1.39 ppm | Native concentration of analyte      |
| DF | 0.0656 % | Dilution Factor (Target < 10%)       |
| CS | 99 ppm   | Cylinder of spiked gas               |
|    | 2.91 ppm | Cylinder of tracer gas (SF6)         |
| Ce | 7.82 ppm | Expected concentration of analyte    |

Recovery (%) **97.9%** 70 - 130%

### Direct Spike Cylinder

| Date             | Method                | FileName             | Methanol (ppm) | SEC (ppm) | Sulfur_Hexafluoride (ppm) | SEC (ppm) |
|------------------|-----------------------|----------------------|----------------|-----------|---------------------------|-----------|
| 10/14/2013 12:51 | 0917-173_Non-Phenol_D | 13_10_14_1251_51_320 | 99             | 0.823     | 2.91                      | 0.0190    |
| 10/14/2013 12:52 | 0917-173_Non-Phenol_D | 13_10_14_1252_52_020 | 99             | 0.822     | 2.91                      | 0.0210    |
| 10/14/2013 12:53 | 0917-173_Non-Phenol_D | 13_10_14_1253_52_871 | 99             | 0.824     | 2.91                      | 0.0180    |
| 10/14/2013 12:54 | 0917-173_Non-Phenol_D | 13_10_14_1254_53_581 | 100            | 0.816     | 2.91                      | 0.0200    |
| 10/14/2013 12:55 | 0917-173_Non-Phenol_D | 13_10_14_1255_54_371 | 100            | 0.825     | 2.92                      | 0.0200    |
| 10/14/2013 12:56 | 0917-173_Non-Phenol_D | 13_10_14_1256_55_131 | 100            | 0.827     | 2.91                      | 0.0200    |
| 10/14/2013 12:57 | 0917-173_Non-Phenol_D | 13_10_14_1257_55_951 | 100            | 0.836     | 2.91                      | 0.0210    |

Avg. Conc. (ppm)

**99**

**2.91**



|                  |                |
|------------------|----------------|
| Company          | ACT            |
| Analyst Initials | STG            |
| Parameters       | EPA Method 320 |

|          |          |
|----------|----------|
| Client # | Amory    |
| Job #    | 0913-173 |
| sample # | 4        |

Dryer Stack Run 1

| Date             | Method      | Filename             | DF | Acrolein (ppm) | SEC (ppm) | Formaldehyde (ppm) | SEC (ppm) | Methanol (ppm) | SEC (ppm) | Phenol (ppm) | SEC (ppm) | Propionaldehyde (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) |
|------------------|-------------|----------------------|----|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|-----------|-----------------------|-----------|--------------------|-----------|
| 10/14/2013 15:15 | 173_Non-Phe | 13_10_14_1515_15_632 | 1  | 2.679          | 1.731     | 0.660              | 0.100     | 3.335          | 0.279     | 3.648        | 2.146     | 0.558                 | 0.166     | 0.867              | 0.514     |
| 10/14/2013 15:16 | 173_Non-Phe | 13_10_14_1516_16_443 | 1  | 2.679          | 1.823     | 0.624              | 0.096     | 3.303          | 0.277     | 3.648        | 2.142     | 0.558                 | 0.163     | 0.867              | 0.521     |
| 10/14/2013 15:17 | 173_Non-Phe | 13_10_14_1517_17_163 | 1  | 2.679          | 1.757     | 0.576              | 0.099     | 3.266          | 0.283     | 3.648        | 2.149     | 0.558                 | 0.164     | 0.867              | 0.516     |
| 10/14/2013 15:18 | 173_Non-Phe | 13_10_14_1518_17_873 | 1  | 2.679          | 1.769     | 0.542              | 0.102     | 3.199          | 0.281     | 3.648        | 2.147     | 0.558                 | 0.168     | 0.867              | 0.524     |
| 10/14/2013 15:19 | 173_Non-Phe | 13_10_14_1519_18_713 | 1  | 2.679          | 1.740     | 0.650              | 0.093     | 3.014          | 0.268     | 3.648        | 2.160     | 0.558                 | 0.158     | 0.867              | 0.513     |
| 10/14/2013 15:20 | 173_Non-Phe | 13_10_14_1520_19_373 | 1  | 2.679          | 1.666     | 0.817              | 0.095     | 2.994          | 0.265     | 3.648        | 2.175     | 0.558                 | 0.158     | 0.867              | 0.493     |
| 10/14/2013 15:21 | 173_Non-Phe | 13_10_14_1521_20_233 | 1  | 2.679          | 1.694     | 0.820              | 0.093     | 3.094          | 0.264     | 3.648        | 2.166     | 0.558                 | 0.155     | 0.867              | 0.498     |
| 10/14/2013 15:22 | 173_Non-Phe | 13_10_14_1522_20_953 | 1  | 2.679          | 1.698     | 0.970              | 0.099     | 3.301          | 0.273     | 3.648        | 2.165     | 0.558                 | 0.163     | 0.867              | 0.520     |
| 10/14/2013 15:23 | 173_Non-Phe | 13_10_14_1523_21_683 | 1  | 2.679          | 1.781     | 0.863              | 0.095     | 3.248          | 0.276     | 3.648        | 2.167     | 0.558                 | 0.161     | 0.867              | 0.522     |
| 10/14/2013 15:24 | 173_Non-Phe | 13_10_14_1524_22_413 | 1  | 2.679          | 1.781     | 0.909              | 0.097     | 3.191          | 0.280     | 3.648        | 2.161     | 0.558                 | 0.164     | 0.867              | 0.519     |
| 10/14/2013 15:25 | 173_Non-Phe | 13_10_14_1525_23_153 | 1  | 2.679          | 1.799     | 0.762              | 0.102     | 3.213          | 0.292     | 3.648        | 2.136     | 0.558                 | 0.169     | 0.867              | 0.531     |
| 10/14/2013 15:26 | 173_Non-Phe | 13_10_14_1526_23_953 | 1  | 2.679          | 1.765     | 0.765              | 0.100     | 3.171          | 0.291     | 3.648        | 2.152     | 0.558                 | 0.164     | 0.867              | 0.516     |
| 10/14/2013 15:27 | 173_Non-Phe | 13_10_14_1527_24_733 | 1  | 2.679          | 1.847     | 0.853              | 0.096     | 3.202          | 0.277     | 3.648        | 2.145     | 0.558                 | 0.163     | 0.867              | 0.530     |
| 10/14/2013 15:28 | 173_Non-Phe | 13_10_14_1528_25_404 | 1  | 2.679          | 1.683     | 0.822              | 0.095     | 3.032          | 0.275     | 3.648        | 2.160     | 0.558                 | 0.157     | 0.867              | 0.492     |
| 10/14/2013 15:29 | 173_Non-Phe | 13_10_14_1529_26_234 | 1  | 2.679          | 1.708     | 0.860              | 0.100     | 3.212          | 0.278     | 3.648        | 2.144     | 0.558                 | 0.162     | 0.867              | 0.514     |
| 10/14/2013 15:30 | 173_Non-Phe | 13_10_14_1530_26_944 | 1  | 2.679          | 1.781     | 0.831              | 0.096     | 3.395          | 0.298     | 3.648        | 2.131     | 0.558                 | 0.163     | 0.867              | 0.516     |
| 10/14/2013 15:31 | 173_Non-Phe | 13_10_14_1531_27_714 | 1  | 2.679          | 1.841     | 0.669              | 0.103     | 3.295          | 0.311     | 3.648        | 2.101     | 0.558                 | 0.171     | 0.867              | 0.546     |
| 10/14/2013 15:32 | 173_Non-Phe | 13_10_14_1532_28_464 | 1  | 2.679          | 1.838     | 0.610              | 0.096     | 3.278          | 0.300     | 3.648        | 2.138     | 0.558                 | 0.165     | 0.867              | 0.537     |
| 10/14/2013 15:33 | 173_Non-Phe | 13_10_14_1533_29_184 | 1  | 2.679          | 1.821     | 0.664              | 0.098     | 3.261          | 0.289     | 3.648        | 2.139     | 0.558                 | 0.166     | 0.867              | 0.536     |
| 10/14/2013 15:34 | 173_Non-Phe | 13_10_14_1534_29_994 | 1  | 2.679          | 1.874     | 0.700              | 0.096     | 3.311          | 0.280     | 3.648        | 2.138     | 0.558                 | 0.167     | 0.867              | 0.540     |
| 10/14/2013 15:35 | 173_Non-Phe | 13_10_14_1535_30_714 | 1  | 2.679          | 1.765     | 0.720              | 0.095     | 3.278          | 0.285     | 3.648        | 2.126     | 0.558                 | 0.162     | 0.867              | 0.516     |
| 10/14/2013 15:36 | 173_Non-Phe | 13_10_14_1536_31_454 | 1  | 2.679          | 1.814     | 0.814              | 0.100     | 3.476          | 0.299     | 3.648        | 2.134     | 0.558                 | 0.168     | 0.867              | 0.532     |
| 10/14/2013 15:37 | 173_Non-Phe | 13_10_14_1537_32_154 | 1  | 2.679          | 1.791     | 0.736              | 0.100     | 3.350          | 0.300     | 3.648        | 2.128     | 0.558                 | 0.167     | 0.867              | 0.527     |
| 10/14/2013 15:38 | 173_Non-Phe | 13_10_14_1538_32_914 | 1  | 2.679          | 1.835     | 0.613              | 0.096     | 3.512          | 0.313     | 3.648        | 2.128     | 0.558                 | 0.164     | 0.867              | 0.532     |
| 10/14/2013 15:39 | 173_Non-Phe | 13_10_14_1539_33_524 | 1  | 2.679          | 1.832     | 0.618              | 0.102     | 3.577          | 0.318     | 3.648        | 2.122     | 0.558                 | 0.171     | 0.867              | 0.538     |
| 10/14/2013 15:40 | 173_Non-Phe | 13_10_14_1540_34_355 | 1  | 2.679          | 1.776     | 0.668              | 0.099     | 3.366          | 0.309     | 3.648        | 2.135     | 0.558                 | 0.167     | 0.867              | 0.533     |
| 10/14/2013 15:41 | 173_Non-Phe | 13_10_14_1541_35_025 | 1  | 2.679          | 1.837     | 0.669              | 0.097     | 3.278          | 0.304     | 3.648        | 2.140     | 0.558                 | 0.166     | 0.867              | 0.536     |
| 10/14/2013 15:42 | 173_Non-Phe | 13_10_14_1542_35_845 | 1  | 2.679          | 1.814     | 0.676              | 0.095     | 3.248          | 0.285     | 3.648        | 2.163     | 0.558                 | 0.162     | 0.867              | 0.524     |
| 10/14/2013 15:43 | 173_Non-Phe | 13_10_14_1543_36_595 | 1  | 2.679          | 1.748     | 0.722              | 0.096     | 3.387          | 0.274     | 3.648        | 2.172     | 0.558                 | 0.160     | 0.867              | 0.510     |
| 10/14/2013 15:44 | 173_Non-Phe | 13_10_14_1544_37_325 | 1  | 2.679          | 1.802     | 0.825              | 0.097     | 3.518          | 0.273     | 3.648        | 2.144     | 0.558                 | 0.163     | 0.867              | 0.521     |
| 10/14/2013 15:45 | 173_Non-Phe | 13_10_14_1545_38_135 | 1  | 2.679          | 1.851     | 0.700              | 0.094     | 3.389          | 0.279     | 3.648        | 2.148     | 0.558                 | 0.162     | 0.867              | 0.528     |
| 10/14/2013 15:46 | 173_Non-Phe | 13_10_14_1546_38_875 | 1  | 2.679          | 1.879     | 0.758              | 0.100     | 3.421          | 0.287     | 3.648        | 2.125     | 0.558                 | 0.171     | 0.867              | 0.536     |
| 10/14/2013 15:47 | 173_Non-Phe | 13_10_14_1547_39_575 | 1  | 2.679          | 1.837     | 0.694              | 0.100     | 3.567          | 0.295     | 3.648        | 2.142     | 0.558                 | 0.170     | 0.867              | 0.530     |
| 10/14/2013 15:48 | 173_Non-Phe | 13_10_14_1548_40_315 | 1  | 2.679          | 1.872     | 0.682              | 0.100     | 3.476          | 0.304     | 3.648        | 2.110     | 0.558                 | 0.171     | 0.867              | 0.553     |
| 10/14/2013 15:49 | 173_Non-Phe | 13_10_14_1549_41_135 | 1  | 2.679          | 1.865     | 0.584              | 0.101     | 3.412          | 0.309     | 3.648        | 2.104     | 0.558                 | 0.171     | 0.867              | 0.532     |
| 10/14/2013 15:50 | 173_Non-Phe | 13_10_14_1550_41_845 | 1  | 2.679          | 1.821     | 0.730              | 0.100     | 3.078          | 0.298     | 3.648        | 2.147     | 0.558                 | 0.169     | 0.867              | 0.537     |
| 10/14/2013 15:51 | 173_Non-Phe | 13_10_14_1551_42_616 | 1  | 2.679          | 1.811     | 0.696              | 0.097     | 3.096          | 0.283     | 3.648        | 2.152     | 0.558                 | 0.166     | 0.867              | 0.534     |
| 10/14/2013 15:52 | 173_Non-Phe | 13_10_14_1552_43_326 | 1  | 2.679          | 1.802     | 0.752              | 0.096     | 3.208          | 0.280     | 3.648        | 2.152     | 0.558                 | 0.162     | 0.867              | 0.533     |
| 10/14/2013 15:53 | 173_Non-Phe | 13_10_14_1553_44_066 | 1  | 2.679          | 1.776     | 0.685              | 0.099     | 3.295          | 0.283     | 3.648        | 2.157     | 0.558                 | 0.166     | 0.867              | 0.539     |
| 10/14/2013 15:54 | 173_Non-Phe | 13_10_14_1554_44_886 | 1  | 2.679          | 1.814     | 0.786              | 0.100     | 3.249          | 0.299     | 3.648        | 2.109     | 0.558                 | 0.170     | 0.867              | 0.542     |
| 10/14/2013 15:55 | 173_Non-Phe | 13_10_14_1555_45_656 | 1  | 2.679          | 1.849     | 0.920              | 0.098     | 3.289          | 0.307     | 3.648        | 2.115     | 0.558                 | 0.168     | 0.867              | 0.539     |
| 10/14/2013 15:56 | 173_Non-Phe | 13_10_14_1556_46_316 | 1  | 2.679          | 1.900     | 0.717              | 0.102     | 3.358          | 0.301     | 3.648        | 2.125     | 0.558                 | 0.173     | 0.867              | 0.549     |
| 10/14/2013 15:57 | 173_Non-Phe | 13_10_14_1557_47_126 | 1  | 2.679          | 1.779     | 0.629              | 0.102     | 3.299          | 0.294     | 3.648        | 2.121     | 0.558                 | 0.170     | 0.867              | 0.530     |
| 10/14/2013 15:58 | 173_Non-Phe | 13_10_14_1558_47_826 | 1  | 2.679          | 1.819     | 0.604              | 0.100     | 3.304          | 0.298     | 3.648        | 2.126     | 0.558                 | 0.168     | 0.867              | 0.536     |
| 10/14/2013 15:59 | 173_Non-Phe | 13_10_14_1559_48_586 | 1  | 2.679          | 1.869     | 0.662              | 0.104     | 3.315          | 0.313     | 3.648        | 2.120     | 0.558                 | 0.172     | 0.867              | 0.551     |
| 10/14/2013 16:00 | 173_Non-Phe | 13_10_14_1600_49_366 | 1  | 2.679          | 1.825     | 0.510              | 0.102     | 3.002          | 0.300     | 3.648        | 2.111     | 0.558                 | 0.171     | 0.867              | 0.536     |
| 10/14/2013 16:01 | 173_Non-Phe | 13_10_14_1601_50_106 | 1  | 2.679          | 1.875     | 0.515              | 0.098     | 2.836          | 0.279     | 3.648        | 2.143     | 0.558                 | 0.168     | 0.867              | 0.540     |
| 10/14/2013 16:02 | 173_Non-Phe | 13_10_14_1602_50_926 | 1  | 2.679          | 1.631     | 0.465              | 0.095     | 2.752          | 0.257     | 3.648        | 2.179     | 0.558                 | 0.159     | 0.867              | 0.495     |
| 10/14/2013 16:03 | 173_Non-Phe | 13_10_14_1603_51_667 | 1  | 2.679          | 1.759     | 0.642              | 0.098     | 2.804          | 0.259     | 3.648        | 2.166     | 0.558                 | 0.162     | 0.867              | 0.526     |
| 10/14/2013 16:04 | 173_Non-Phe | 13_10_14_1604_52_377 | 1  | 2.679          | 1.809     | 0.711              | 0.096     | 2.729          | 0.248     | 3.648        | 2.181     | 0.558                 | 0.164     | 0.867              | 0.535     |
| 10/14/2013 16:05 | 173_Non-Phe | 13_10_14_1605_53_187 | 1  | 2.679          | 1.700     | 0.580              | 0.093     | 2.727          | 0.235     | 3.648        | 2.198     | 0.558                 | 0.157     | 0.867              | 0.504     |
| 10/14/2013 16:06 | 173_Non-Phe | 13_10_14_1606_53_907 | 1  | 2.679          | 1.760     | 0.661              | 0.090     | 2.664          | 0.237     | 3.648        | 2.180     | 0.558                 | 0.155     | 0.867              | 0.502     |
| 10/14/2013 16:07 | 173_Non-Phe | 13_10_14_1607_54_617 | 1  | 2.679          | 1.722     | 0.567              | 0.093     | 2.911          | 0.238     | 3.648        | 2.200     | 0.558                 | 0.156     | 0.867              | 0.516     |
| 10/14/2013 16:08 | 173_Non-Phe | 13_10_14_1608_55_427 | 1  | 2.679          | 1.739     | 0.671              | 0.098     | 3.001          | 0.251     | 3.648        | 2.184     | 0.558                 | 0.161     | 0.867              | 0.516     |
| 10/14/2013 16:09 | 173_Non-Phe | 13_10_14_1609_56_147 | 1  | 2.679          | 1.622     | 0.868              | 0.098     | 2.846          | 0.265     | 3.648        | 2.176     | 0.558                 | 0.153     | 0.867              | 0.485     |
| 10/14/2013 16:10 | 173_Non-Phe | 13_10_14_1610_56_957 | 1  | 2.679          | 1.759     | 1.038              | 0.094     | 2.653          | 0.264     | 3.648        | 2.204     | 0.558                 | 0.157     | 0.867              | 0.507     |
| 10/14/2013 16:11 | 173_Non-Phe | 13_10_14_1611_57_677 | 1  | 2.679          | 1.773     | 1.094              | 0.093     | 2.518          | 0.275     | 3.648        | 2.193     | 0.558                 | 0.157     | 0.867              | 0.507     |
| 10/14/2013 16:12 | 173_Non-Phe | 13_10_14_1612_58_447 | 1  | 2.679          | 1.747     | 0.934              | 0.091     | 2.635          | 0.282     | 3.648        | 2.188     | 0.558                 | 0.156     | 0.867              | 0.506     |
| 10/14/2013 16:13 | 173_Non-Phe | 13_10_14_1613_59_217 | 1  | 2.679          | 1.777     | 0.857              | 0.098     | 2.561          | 0.293     | 3.648        | 2.175     | 0.558                 | 0.165     | 0.867              | 0.524     |
| 10/14/2013 16:14 | 173_Non-Phe | 13_10_14_1614_59_927 | 1  | 2.679          | 1.873     | 0.784              | 0.100     | 2.667          | 0.294     | 3.648        | 2.198     | 0.558                 | 0.170     | 0.867              | 0.564     |
| 10/14/2013 16:16 | 173_Non-Phe | 13_10_14_1616_00_738 | 1  | 2.679          | 1.747     | 0.728              | 0.093     | 4.095          | 0.28      |              |           |                       |           |                    |           |

Dryer Stack Run 2

| Date             | Method      | Filename             | DF | Acrolein (ppm) | SEC (ppm) | Formaldehyde (ppm) | SEC (ppm) | Methanol (ppm) | SEC (ppm) | Phenol (ppm) | SEC (ppm) | Propionaldehyde (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) |
|------------------|-------------|----------------------|----|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|-----------|-----------------------|-----------|--------------------|-----------|
| 10/14/2013 16:49 | 173_Non-Phe | 13_10_14_1649_26_670 | 1  | 2.679          | 1.819     | 0.552              | 0.101     | 1.959          | 0.318     | 3.648        | 2.155     | 0.558                 | 0.166     | 0.867              | 0.536     |
| 10/14/2013 16:50 | 173_Non-Phe | 13_10_14_1650_27_360 | 1  | 2.679          | 1.859     | 0.594              | 0.103     | 1.945          | 0.330     | 3.648        | 2.144     | 0.558                 | 0.171     | 0.867              | 0.549     |
| 10/14/2013 16:51 | 173_Non-Phe | 13_10_14_1651_28_211 | 1  | 2.679          | 1.940     | 0.923              | 0.104     | 1.935          | 0.34      | 3.648        | 2.147     | 0.558                 | 0.175     | 0.867              | 0.571     |
| 10/14/2013 16:52 | 173_Non-Phe | 13_10_14_1652_28_891 | 1  | 2.679          | 1.802     | 0.562              | 0.097     | 1.806          | 0.317     | 3.648        | 2.145     | 0.558                 | 0.164     | 0.867              | 0.532     |
| 10/14/2013 16:53 | 173_Non-Phe | 13_10_14_1653_29_651 | 1  | 2.679          | 1.745     | 0.472              | 0.098     | 1.699          | 0.283     | 3.648        | 2.201     | 0.558                 | 0.163     | 0.867              | 0.530     |
| 10/14/2013 16:54 | 173_Non-Phe | 13_10_14_1654_30_471 | 1  | 2.679          | 1.826     | 0.332              | 0.098     | 1.639          | 0.293     | 3.648        | 2.208     | 0.558                 | 0.164     | 0.867              | 0.531     |
| 10/14/2013 16:55 | 173_Non-Phe | 13_10_14_1655_31_191 | 1  | 2.679          | 1.769     | 0.590              | 0.098     | 1.708          | 0.274     | 3.648        | 2.216     | 0.558                 | 0.163     | 0.867              | 0.521     |
| 10/14/2013 16:56 | 173_Non-Phe | 13_10_14_1656_31_609 | 1  | 2.679          | 1.630     | 0.411              | 0.097     | 1.606          | 0.265     | 3.648        | 2.205     | 0.558                 | 0.162     | 0.867              | 0.476     |
| 10/14/2013 16:57 | 173_Non-Phe | 13_10_14_1657_32_741 | 1  | 2.679          | 1.798     | 0.470              | 0.090     | 1.798          | 0.244     | 3.648        | 2.224     | 0.558                 | 0.155     | 0.867              | 0.506     |
| 10/14/2013 16:58 | 173_Non-Phe | 13_10_14_1658_33_491 | 1  | 2.679          | 1.825     | 0.441              | 0.097     | 1.850          | 0.267     | 3.648        | 2.192     | 0.558                 | 0.162     | 0.867              | 0.537     |
| 10/14/2013 16:59 | 173_Non-Phe | 13_10_14_1659_34_201 | 1  | 2.679          | 1.855     | 0.607              | 0.100     | 1.947          | 0.294     | 3.648        | 2.180     | 0.558                 | 0.167     | 0.867              | 0.538     |
| 10/14/2013 17:00 | 173_Non-Phe | 13_10_14_1700_34_961 | 1  | 2.679          | 1.766     | 0.503              | 0.101     | 1.835          | 0.302     | 3.648        | 2.189     | 0.558                 | 0.166     | 0.867              | 0.525     |
| 10/14/2013 17:01 | 173_Non-Phe | 13_10_14_1701_35_681 | 1  | 2.679          | 1.826     | 0.441              | 0.098     | 1.855          | 0.304     | 3.648        | 2.174     | 0.558                 | 0.165     | 0.867              | 0.543     |
| 10/14/2013 17:02 | 173_Non-Phe | 13_10_14_1702_36_361 | 1  | 2.679          | 1.878     | 0.458              | 0.097     | 1.922          | 0.302     | 3.648        | 2.177     | 0.558                 | 0.165     | 0.867              | 0.527     |
| 10/14/2013 17:03 | 173_Non-Phe | 13_10_14_1703_37_172 | 1  | 2.679          | 1.834     | 0.411              | 0.101     | 1.739          | 0.288     | 3.648        | 2.196     | 0.558                 | 0.168     | 0.867              | 0.542     |
| 10/14/2013 17:04 | 173_Non-Phe | 13_10_14_1704_37_962 | 1  | 2.679          | 1.782     | 0.527              | 0.094     | 1.706          | 0.272     | 3.648        | 2.206     | 0.558                 | 0.160     | 0.867              | 0.514     |
| 10/14/2013 17:05 | 173_Non-Phe | 13_10_14_1705_38_702 | 1  | 2.679          | 1.712     | 0.713              | 0.096     | 1.928          | 0.268     | 3.648        | 2.211     | 0.558                 | 0.158     | 0.867              | 0.514     |
| 10/14/2013 17:06 | 173_Non-Phe | 13_10_14_1706_39_462 | 1  | 2.679          | 1.780     | 0.525              | 0.100     | 1.887          | 0.271     | 3.648        | 2.185     | 0.558                 | 0.164     | 0.867              | 0.536     |
| 10/14/2013 17:07 | 173_Non-Phe | 13_10_14_1707_40_232 | 1  | 2.679          | 1.707     | 0.470              | 0.097     | 1.670          | 0.267     | 3.648        | 2.193     | 0.558                 | 0.163     | 0.867              | 0.518     |
| 10/14/2013 17:08 | 173_Non-Phe | 13_10_14_1708_41_042 | 1  | 2.679          | 1.846     | 0.662              | 0.101     | 1.794          | 0.299     | 3.648        | 2.183     | 0.558                 | 0.168     | 0.867              | 0.540     |
| 10/14/2013 17:09 | 173_Non-Phe | 13_10_14_1709_41_782 | 1  | 2.679          | 1.794     | 0.639              | 0.104     | 1.777          | 0.293     | 3.648        | 2.193     | 0.558                 | 0.169     | 0.867              | 0.540     |
| 10/14/2013 17:10 | 173_Non-Phe | 13_10_14_1710_42_582 | 1  | 2.679          | 1.809     | 0.490              | 0.101     | 1.813          | 0.288     | 3.648        | 2.181     | 0.558                 | 0.167     | 0.867              | 0.539     |
| 10/14/2013 17:11 | 173_Non-Phe | 13_10_14_1711_43_292 | 1  | 2.679          | 1.927     | 0.534              | 0.098     | 1.760          | 0.294     | 3.648        | 2.173     | 0.558                 | 0.169     | 0.867              | 0.557     |
| 10/14/2013 17:12 | 173_Non-Phe | 13_10_14_1712_42_992 | 1  | 2.679          | 1.888     | 0.554              | 0.098     | 1.791          | 0.287     | 3.648        | 2.168     | 0.558                 | 0.167     | 0.867              | 0.539     |
| 10/14/2013 17:13 | 173_Non-Phe | 13_10_14_1713_43_802 | 1  | 2.679          | 1.865     | 0.511              | 0.102     | 1.721          | 0.286     | 3.648        | 2.172     | 0.558                 | 0.169     | 0.867              | 0.553     |
| 10/14/2013 17:14 | 173_Non-Phe | 13_10_14_1714_44_502 | 1  | 2.679          | 1.849     | 0.545              | 0.101     | 1.676          | 0.283     | 3.648        | 2.177     | 0.558                 | 0.169     | 0.867              | 0.544     |
| 10/14/2013 17:15 | 173_Non-Phe | 13_10_14_1715_45_343 | 1  | 2.679          | 1.743     | 0.515              | 0.098     | 1.768          | 0.271     | 3.648        | 2.196     | 0.558                 | 0.162     | 0.867              | 0.527     |
| 10/14/2013 17:16 | 173_Non-Phe | 13_10_14_1716_46_033 | 1  | 2.679          | 1.717     | 0.603              | 0.095     | 1.744          | 0.274     | 3.648        | 2.198     | 0.558                 | 0.160     | 0.867              | 0.521     |
| 10/14/2013 17:17 | 173_Non-Phe | 13_10_14_1717_46_833 | 1  | 2.679          | 1.918     | 0.467              | 0.096     | 1.825          | 0.286     | 3.648        | 2.185     | 0.558                 | 0.168     | 0.867              | 0.545     |
| 10/14/2013 17:18 | 173_Non-Phe | 13_10_14_1718_47_563 | 1  | 2.679          | 1.830     | 0.494              | 0.100     | 1.854          | 0.283     | 3.648        | 2.183     | 0.558                 | 0.167     | 0.867              | 0.538     |
| 10/14/2013 17:19 | 173_Non-Phe | 13_10_14_1719_48_383 | 1  | 2.679          | 1.765     | 0.578              | 0.098     | 1.787          | 0.290     | 3.648        | 2.190     | 0.558                 | 0.164     | 0.867              | 0.541     |
| 10/14/2013 17:20 | 173_Non-Phe | 13_10_14_1720_49_093 | 1  | 2.679          | 1.824     | 0.535              | 0.098     | 1.775          | 0.299     | 3.648        | 2.174     | 0.558                 | 0.166     | 0.867              | 0.552     |
| 10/14/2013 17:21 | 173_Non-Phe | 13_10_14_1721_49_883 | 1  | 2.679          | 1.799     | 0.555              | 0.100     | 1.820          | 0.286     | 3.648        | 2.199     | 0.558                 | 0.167     | 0.867              | 0.546     |
| 10/14/2013 17:22 | 173_Non-Phe | 13_10_14_1722_50_683 | 1  | 2.679          | 1.751     | 0.624              | 0.098     | 1.744          | 0.287     | 3.648        | 2.189     | 0.558                 | 0.163     | 0.867              | 0.519     |
| 10/14/2013 17:23 | 173_Non-Phe | 13_10_14_1723_51_453 | 1  | 2.679          | 1.780     | 0.497              | 0.097     | 1.705          | 0.269     | 3.648        | 2.199     | 0.558                 | 0.161     | 0.867              | 0.513     |
| 10/14/2013 17:24 | 173_Non-Phe | 13_10_14_1724_52_163 | 1  | 2.679          | 1.608     | 0.495              | 0.091     | 1.530          | 0.242     | 3.648        | 2.226     | 0.558                 | 0.149     | 0.867              | 0.476     |
| 10/14/2013 17:25 | 173_Non-Phe | 13_10_14_1725_52_963 | 1  | 2.679          | 1.541     | 0.333              | 0.085     | 1.545          | 0.229     | 3.648        | 2.225     | 0.558                 | 0.142     | 0.867              | 0.457     |
| 10/14/2013 17:26 | 173_Non-Phe | 13_10_14_1726_53_674 | 1  | 2.679          | 1.666     | 0.266              | 0.090     | 1.609          | 0.233     | 3.648        | 2.214     | 0.558                 | 0.150     | 0.867              | 0.482     |
| 10/14/2013 17:27 | 173_Non-Phe | 13_10_14_1727_54_454 | 1  | 2.679          | 1.685     | 0.209              | 0.093     | 1.754          | 0.242     | 3.648        | 2.226     | 0.558                 | 0.153     | 0.867              | 0.500     |
| 10/14/2013 17:28 | 173_Non-Phe | 13_10_14_1728_55_304 | 1  | 2.679          | 1.627     | 0.520              | 0.093     | 1.670          | 0.251     | 3.648        | 2.220     | 0.558                 | 0.153     | 0.867              | 0.494     |
| 10/14/2013 17:29 | 173_Non-Phe | 13_10_14_1729_56_064 | 1  | 2.679          | 1.834     | 0.689              | 0.103     | 1.688          | 0.263     | 3.648        | 2.217     | 0.558                 | 0.154     | 0.867              | 0.526     |
| 10/14/2013 17:32 | 173_Non-Phe | 13_10_14_1732_06_400 | 1  | 2.679          | 1.695     | 0.760              | 0.092     | 1.782          | 0.270     | 3.648        | 2.210     | 0.558                 | 0.155     | 0.867              | 0.493     |
| 10/14/2013 17:33 | 173_Non-Phe | 13_10_14_1733_07_210 | 1  | 2.679          | 1.722     | 0.776              | 0.098     | 1.917          | 0.292     | 3.648        | 2.165     | 0.558                 | 0.161     | 0.867              | 0.511     |
| 10/14/2013 17:34 | 173_Non-Phe | 13_10_14_1734_07_900 | 1  | 2.679          | 1.909     | 0.659              | 0.098     | 1.956          | 0.320     | 3.648        | 2.162     | 0.558                 | 0.167     | 0.867              | 0.548     |
| 10/14/2013 17:35 | 173_Non-Phe | 13_10_14_1735_08_740 | 1  | 2.679          | 1.932     | 0.737              | 0.102     | 2.107          | 0.334     | 3.648        | 2.129     | 0.558                 | 0.172     | 0.867              | 0.568     |

|                  |                |          |          |
|------------------|----------------|----------|----------|
| Company          | ACT            | Client # | Amory    |
| Analyst Initials | STG            | Job #    | 0913-173 |
| Parameters       | EPA Method 320 | sample # | 4        |

|                      |             |                      |   |       |       |       |       |       |       |       |       |       |       |       |       |       |
|----------------------|-------------|----------------------|---|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| 10/14/2013 17:36     | 173_Non-Phe | 13_10_14_1736_09_450 | 1 | 2.679 | 1.787 | 0.659 | 0.104 | 2.111 | 0.331 | 3.648 | 2.136 | 0.558 | 0.169 | 0.867 | 0.543 |       |
| 10/14/2013 17:37     | 173_Non-Phe | 13_10_14_1737_10_280 | 1 | 2.679 | 1.903 | 0.968 | 0.102 | 2.078 | 0.331 | 3.648 | 2.152 | 0.558 | 0.171 | 0.867 | 0.556 |       |
| 10/14/2013 17:38     | 173_Non-Phe | 13_10_14_1738_11_030 | 1 | 2.679 | 1.892 | 0.764 | 0.105 | 2.073 | 0.314 | 3.648 | 2.136 | 0.558 | 0.175 | 0.867 | 0.557 |       |
| 10/14/2013 17:39     | 173_Non-Phe | 13_10_14_1739_11_730 | 1 | 2.679 | 1.849 | 0.596 | 0.101 | 1.976 | 0.311 | 3.648 | 2.152 | 0.558 | 0.169 | 0.867 | 0.551 |       |
| 10/14/2013 17:40     | 173_Non-Phe | 13_10_14_1740_12_560 | 1 | 2.679 | 1.867 | 0.528 | 0.097 | 1.943 | 0.302 | 3.648 | 2.181 | 0.558 | 0.166 | 0.867 | 0.530 |       |
| 10/14/2013 17:41     | 173_Non-Phe | 13_10_14_1741_13_270 | 1 | 2.679 | 1.432 | 0.211 | 0.087 | 1.911 | 0.163 | 3.648 | 1.885 | 0.558 | 0.152 | 0.867 | 0.443 |       |
| 10/14/2013 17:42     | 173_Non-Phe | 13_10_14_1742_14_040 | 1 | 2.679 | 1.059 | 0.205 | 0.100 | 0.276 | 0.049 | 3.648 | 0.799 | 0.558 | 0.167 | 0.867 | 0.398 |       |
| 10/14/2013 17:43     | 173_Non-Phe | 13_10_14_1743_14_781 | 1 | 2.679 | 1.076 | 0.205 | 0.099 | 0.276 | 0.045 | 3.648 | 0.374 | 0.558 | 0.171 | 0.867 | 0.411 |       |
| 10/14/2013 17:44     | 173_Non-Phe | 13_10_14_1744_15_531 | 1 | 2.679 | 1.006 | 0.205 | 0.089 | 0.586 | 0.051 | 3.648 | 0.698 | 0.558 | 0.145 | 0.867 | 0.350 |       |
| 10/14/2013 17:45     | 173_Non-Phe | 13_10_14_1745_16_341 | 1 | 2.679 | 0.994 | 0.205 | 0.061 | 0.441 | 0.038 | 3.648 | 0.538 | 0.558 | 0.098 | 0.867 | 0.312 |       |
| 10/14/2013 17:46     | 173_Non-Phe | 13_10_14_1746_16_981 | 1 | 2.679 | 0.984 | 0.205 | 0.056 | 0.276 | 0.033 | 3.648 | 0.229 | 0.558 | 0.090 | 0.867 | 0.295 |       |
| 10/14/2013 17:47     | 173_Non-Phe | 13_10_14_1747_17_691 | 1 | 2.679 | 0.946 | 0.205 | 0.060 | 0.276 | 0.031 | 3.648 | 0.149 | 0.558 | 0.094 | 0.867 | 0.299 |       |
| 10/14/2013 17:48     | 173_Non-Phe | 13_10_14_1748_18_511 | 1 | 2.679 | 1.042 | 0.205 | 0.056 | 0.276 | 0.032 | 3.648 | 0.126 | 0.558 | 0.093 | 0.867 | 0.308 |       |
| 10/14/2013 17:49     | 173_Non-Phe | 13_10_14_1749_19_221 | 1 | 2.679 | 1.087 | 0.205 | 0.054 | 0.276 | 0.032 | 3.648 | 0.127 | 0.558 | 0.092 | 0.867 | 0.316 |       |
| Average Conc. (ppm): |             |                      |   | 1     | 2.679 | 1.686 | 0.507 | 0.094 | 1.615 | 0.251 | 3.648 | 1.936 | 0.558 | 0.157 | 0.867 | 0.501 |

#### Dryer Stack Run 3

| Date                 | Method      | Filename             | DF | Acrolein (ppm) | SEC (ppm) | Formaldehyde (ppm) | SEC (ppm) | Methanol (ppm) | SEC (ppm) | Phenol (ppm) | SEC (ppm) | Propionaldehyde (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) |       |
|----------------------|-------------|----------------------|----|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|-----------|-----------------------|-----------|--------------------|-----------|-------|
| 10/14/2013 17:58     | 173_Non-Phe | 13_10_14_1758_26_092 | 1  | 2.679          | 1.704     | 0.585              | 0.098     | 2.079          | 0.293     | 3.648        | 2.182     | 0.558                 | 0.161     | 0.867              | 0.516     |       |
| 10/14/2013 17:59     | 173_Non-Phe | 13_10_14_1759_26_902 | 1  | 2.679          | 1.735     | 0.603              | 0.099     | 2.115          | 0.283     | 3.648        | 2.193     | 0.558                 | 0.161     | 0.867              | 0.513     |       |
| 10/14/2013 18:00     | 173_Non-Phe | 13_10_14_1800_27_632 | 1  | 2.679          | 1.818     | 0.479              | 0.101     | 2.119          | 0.279     | 3.648        | 2.210     | 0.558                 | 0.168     | 0.867              | 0.530     |       |
| 10/14/2013 18:01     | 173_Non-Phe | 13_10_14_1801_28_432 | 1  | 2.679          | 1.768     | 0.397              | 0.098     | 2.168          | 0.271     | 3.648        | 2.195     | 0.558                 | 0.162     | 0.867              | 0.527     |       |
| 10/14/2013 18:02     | 173_Non-Phe | 13_10_14_1802_29_182 | 1  | 2.679          | 1.859     | 0.423              | 0.099     | 2.196          | 0.286     | 3.648        | 2.175     | 0.558                 | 0.167     | 0.867              | 0.536     |       |
| 10/14/2013 18:03     | 173_Non-Phe | 13_10_14_1803_29_932 | 1  | 2.679          | 1.861     | 0.523              | 0.097     | 2.135          | 0.296     | 3.648        | 2.192     | 0.558                 | 0.165     | 0.867              | 0.538     |       |
| 10/14/2013 18:04     | 173_Non-Phe | 13_10_14_1804_30_752 | 1  | 2.679          | 1.776     | 0.445              | 0.104     | 2.231          | 0.298     | 3.648        | 2.168     | 0.558                 | 0.170     | 0.867              | 0.540     |       |
| 10/14/2013 18:05     | 173_Non-Phe | 13_10_14_1805_31_502 | 1  | 2.679          | 1.914     | 0.494              | 0.100     | 2.139          | 0.301     | 3.648        | 2.182     | 0.558                 | 0.169     | 0.867              | 0.558     |       |
| 10/14/2013 18:06     | 173_Non-Phe | 13_10_14_1806_32_222 | 1  | 2.679          | 1.773     | 0.560              | 0.101     | 2.088          | 0.271     | 3.648        | 2.208     | 0.558                 | 0.164     | 0.867              | 0.532     |       |
| 10/14/2013 18:07     | 173_Non-Phe | 13_10_14_1807_33_033 | 1  | 2.679          | 1.730     | 0.470              | 0.094     | 1.932          | 0.255     | 3.648        | 2.215     | 0.558                 | 0.158     | 0.867              | 0.518     |       |
| 10/14/2013 18:08     | 173_Non-Phe | 13_10_14_1808_33_783 | 1  | 2.679          | 1.709     | 0.531              | 0.096     | 2.026          | 0.252     | 3.648        | 2.235     | 0.558                 | 0.159     | 0.867              | 0.517     |       |
| 10/14/2013 18:09     | 173_Non-Phe | 13_10_14_1809_34_493 | 1  | 2.679          | 1.720     | 0.447              | 0.097     | 2.150          | 0.245     | 3.648        | 2.225     | 0.558                 | 0.162     | 0.867              | 0.533     |       |
| 10/14/2013 18:10     | 173_Non-Phe | 13_10_14_1810_35_313 | 1  | 2.679          | 1.858     | 0.577              | 0.097     | 2.101          | 0.262     | 3.648        | 2.199     | 0.558                 | 0.164     | 0.867              | 0.527     |       |
| 10/14/2013 18:11     | 173_Non-Phe | 13_10_14_1811_36_053 | 1  | 2.679          | 1.761     | 0.777              | 0.098     | 2.140          | 0.273     | 3.648        | 2.210     | 0.558                 | 0.162     | 0.867              | 0.520     |       |
| 10/14/2013 18:12     | 173_Non-Phe | 13_10_14_1812_36_863 | 1  | 2.679          | 1.787     | 0.738              | 0.097     | 2.252          | 0.274     | 3.648        | 2.194     | 0.558                 | 0.162     | 0.867              | 0.530     |       |
| 10/14/2013 18:13     | 173_Non-Phe | 13_10_14_1813_37_653 | 1  | 2.679          | 1.834     | 0.751              | 0.099     | 2.248          | 0.279     | 3.648        | 2.193     | 0.558                 | 0.166     | 0.867              | 0.546     |       |
| 10/14/2013 18:14     | 173_Non-Phe | 13_10_14_1814_38_393 | 1  | 2.679          | 1.794     | 0.734              | 0.101     | 2.361          | 0.298     | 3.648        | 2.177     | 0.558                 | 0.167     | 0.867              | 0.544     |       |
| 10/14/2013 18:15     | 173_Non-Phe | 13_10_14_1815_39_133 | 1  | 2.679          | 1.897     | 0.626              | 0.100     | 2.420          | 0.309     | 3.648        | 2.161     | 0.558                 | 0.168     | 0.867              | 0.543     |       |
| 10/14/2013 18:16     | 173_Non-Phe | 13_10_14_1816_39_933 | 1  | 2.679          | 1.888     | 0.531              | 0.100     | 2.270          | 0.309     | 3.648        | 2.169     | 0.558                 | 0.169     | 0.867              | 0.543     |       |
| 10/14/2013 18:17     | 173_Non-Phe | 13_10_14_1817_40_663 | 1  | 2.679          | 1.779     | 0.649              | 0.101     | 2.231          | 0.303     | 3.648        | 2.178     | 0.558                 | 0.167     | 0.867              | 0.538     |       |
| 10/14/2013 18:18     | 173_Non-Phe | 13_10_14_1818_41_463 | 1  | 2.679          | 1.904     | 0.627              | 0.102     | 2.215          | 0.289     | 3.648        | 2.203     | 0.558                 | 0.171     | 0.867              | 0.549     |       |
| 10/14/2013 18:19     | 173_Non-Phe | 13_10_14_1819_42_244 | 1  | 2.679          | 1.835     | 0.576              | 0.100     | 2.120          | 0.278     | 3.648        | 2.194     | 0.558                 | 0.167     | 0.867              | 0.541     |       |
| 10/14/2013 18:20     | 173_Non-Phe | 13_10_14_1820_42_954 | 1  | 2.679          | 1.739     | 0.450              | 0.098     | 2.074          | 0.277     | 3.648        | 2.213     | 0.558                 | 0.163     | 0.867              | 0.526     |       |
| 10/14/2013 18:21     | 173_Non-Phe | 13_10_14_1821_43_794 | 1  | 2.679          | 1.707     | 0.468              | 0.099     | 1.973          | 0.269     | 3.648        | 2.222     | 0.558                 | 0.162     | 0.867              | 0.520     |       |
| 10/14/2013 18:22     | 173_Non-Phe | 13_10_14_1822_44_554 | 1  | 2.679          | 1.808     | 0.542              | 0.100     | 2.166          | 0.268     | 3.648        | 2.213     | 0.558                 | 0.166     | 0.867              | 0.539     |       |
| 10/14/2013 18:23     | 173_Non-Phe | 13_10_14_1823_45_304 | 1  | 2.679          | 1.777     | 0.728              | 0.099     | 2.103          | 0.272     | 3.648        | 2.211     | 0.558                 | 0.165     | 0.867              | 0.538     |       |
| 10/14/2013 18:24     | 173_Non-Phe | 13_10_14_1824_46_064 | 1  | 2.679          | 1.704     | 0.796              | 0.098     | 2.169          | 0.269     | 3.648        | 2.222     | 0.558                 | 0.160     | 0.867              | 0.511     |       |
| 10/14/2013 18:25     | 173_Non-Phe | 13_10_14_1825_46_864 | 1  | 2.679          | 1.749     | 0.642              | 0.093     | 2.226          | 0.261     | 3.648        | 2.221     | 0.558                 | 0.157     | 0.867              | 0.505     |       |
| 10/14/2013 18:26     | 173_Non-Phe | 13_10_14_1826_47_634 | 1  | 2.679          | 1.774     | 0.621              | 0.097     | 2.089          | 0.260     | 3.648        | 2.235     | 0.558                 | 0.161     | 0.867              | 0.519     |       |
| 10/14/2013 18:27     | 173_Non-Phe | 13_10_14_1827_48_244 | 1  | 2.679          | 1.821     | 0.564              | 0.098     | 2.011          | 0.266     | 3.648        | 2.227     | 0.558                 | 0.163     | 0.867              | 0.532     |       |
| 10/14/2013 18:28     | 173_Non-Phe | 13_10_14_1828_49_064 | 1  | 2.679          | 1.796     | 0.753              | 0.095     | 1.950          | 0.258     | 3.648        | 2.250     | 0.558                 | 0.158     | 0.867              | 0.517     |       |
| 10/14/2013 18:29     | 173_Non-Phe | 13_10_14_1829_49_814 | 1  | 2.679          | 1.717     | 0.699              | 0.095     | 1.856          | 0.255     | 3.648        | 2.245     | 0.558                 | 0.158     | 0.867              | 0.524     |       |
| 10/14/2013 18:30     | 173_Non-Phe | 13_10_14_1830_50_525 | 1  | 2.679          | 1.719     | 0.583              | 0.097     | 1.961          | 0.260     | 3.648        | 2.240     | 0.558                 | 0.160     | 0.867              | 0.507     |       |
| 10/14/2013 18:31     | 173_Non-Phe | 13_10_14_1831_51_325 | 1  | 2.679          | 1.730     | 0.742              | 0.100     | 2.106          | 0.277     | 3.648        | 2.200     | 0.558                 | 0.162     | 0.867              | 0.531     |       |
| 10/14/2013 18:32     | 173_Non-Phe | 13_10_14_1832_52_055 | 1  | 2.679          | 1.825     | 0.861              | 0.101     | 2.133          | 0.300     | 3.648        | 2.199     | 0.558                 | 0.167     | 0.867              | 0.544     |       |
| 10/14/2013 18:33     | 173_Non-Phe | 13_10_14_1833_52_925 | 1  | 2.679          | 1.928     | 0.706              | 0.101     | 2.201          | 0.321     | 3.648        | 2.173     | 0.558                 | 0.170     | 0.867              | 0.541     |       |
| 10/14/2013 18:34     | 173_Non-Phe | 13_10_14_1834_53_625 | 1  | 2.679          | 1.829     | 0.653              | 0.104     | 2.351          | 0.326     | 3.648        | 2.176     | 0.558                 | 0.171     | 0.867              | 0.547     |       |
| 10/14/2013 18:35     | 173_Non-Phe | 13_10_14_1835_54_365 | 1  | 2.679          | 1.916     | 0.669              | 0.101     | 2.462          | 0.329     | 3.648        | 2.161     | 0.558                 | 0.170     | 0.867              | 0.557     |       |
| 10/14/2013 18:36     | 173_Non-Phe | 13_10_14_1836_55_185 | 1  | 2.679          | 1.954     | 0.740              | 0.108     | 2.479          | 0.335     | 3.648        | 2.151     | 0.558                 | 0.179     | 0.867              | 0.575     |       |
| 10/14/2013 18:37     | 173_Non-Phe | 13_10_14_1837_55_925 | 1  | 2.679          | 1.873     | 0.840              | 0.109     | 2.457          | 0.335     | 3.648        | 2.151     | 0.558                 | 0.177     | 0.867              | 0.568     |       |
| 10/14/2013 18:38     | 173_Non-Phe | 13_10_14_1838_56_745 | 1  | 2.679          | 1.862     | 0.605              | 0.101     | 2.324          | 0.316     | 3.648        | 2.183     | 0.558                 | 0.169     | 0.867              | 0.545     |       |
| 10/14/2013 18:39     | 173_Non-Phe | 13_10_14_1839_57_545 | 1  | 2.679          | 1.841     | 0.574              | 0.101     | 2.235          | 0.306     | 3.648        | 2.191     | 0.558                 | 0.167     | 0.867              | 0.548     |       |
| 10/14/2013 18:40     | 173_Non-Phe | 13_10_14_1840_58_315 | 1  | 2.679          | 1.774     | 0.428              | 0.104     | 2.154          | 0.279     | 3.648        | 2.223     | 0.558                 | 0.170     | 0.867              | 0.531     |       |
| 10/14/2013 18:41     | 173_Non-Phe | 13_10_14_1841_59_045 | 1  | 2.679          | 1.740     | 0.416              | 0.098     | 2.214          | 0.265     | 3.648        | 2.221     | 0.558                 | 0.163     | 0.867              | 0.536     |       |
| 10/14/2013 18:42     | 173_Non-Phe | 13_10_14_1842_59_866 | 1  | 2.679          | 1.813     | 0.647              | 0.097     | 2.183          | 0.255     | 3.648        | 2.221     | 0.558                 | 0.164     | 0.867              | 0.528     |       |
| 10/14/2013 18:44     | 173_Non-Phe | 13_10_14_1844_00_576 | 1  | 2.679          | 1.750     | 0.509              | 0.093     | 2.136          | 0.245     | 3.648        | 2.230     | 0.558                 | 0.157     | 0.867              | 0.513     |       |
| 10/14/2013 18:45     | 173_Non-Phe | 13_10_14_1845_01_296 | 1  | 2.679          | 1.752     | 0.475              | 0.097     | 2.105          | 0.250     | 3.648        | 2.227     | 0.558                 | 0.161     | 0.867              | 0.515     |       |
| 10/14/2013 18:46     | 173_Non-Phe | 13_10_14_1846_02_146 | 1  | 2.679          | 1.785     | 0.453              | 0.099     | 2.110          | 0.257     | 3.648        | 2.224     | 0.558                 | 0.162     | 0.867              | 0.527     |       |
| 10/14/2013 18:47     | 173_Non-Phe | 13_10_14_1847_02_896 | 1  | 2.679          | 1.670     | 0.722              | 0.096     | 2.034          | 0.259     | 3.648        | 2.231     | 0.558                 | 0.156     | 0.867              | 0.508     |       |
| 10/14/2013 18:48     | 173_Non-Phe | 13_10_14_1848_03_616 | 1  | 2.679          | 1.822     | 0.776              | 0.096     | 2.090          | 0.265     | 3.648        | 2.223     | 0.558                 | 0.162     | 0.867              | 0.526     |       |
| 10/14/2013 18:49     | 173_Non-Phe | 13_10_14_1849_04_376 | 1  | 2.679          | 1.748     | 0.943              | 0.096     | 2.052          | 0.275     | 3.648        | 2.229     | 0.558                 | 0.159     | 0.867              | 0.518     |       |
| 10/14/2013 18:50     | 173_Non-Phe | 13_10_14_1850_05_206 | 1  | 2.679          | 1.832     | 1.014              | 0.096     | 2.008          | 0.273     | 3.648        | 2.221     | 0.558                 | 0.161     | 0.867              | 0.522     |       |
| 10/14/2013 18:51     | 173_Non-Phe | 13_10_14_1851_05_936 | 1  | 2.679          | 1.749     | 0.949              | 0.094     | 1.874          | 0.268     | 3.648        | 2.226     | 0.558                 | 0.158     | 0.867              | 0.522     |       |
| 10/14/2013 18:52     | 173_Non-Phe | 13_10_14_1852_06_736 | 1  | 2.679          | 1.713     | 0.968              | 0.092     | 1.995          | 0.270     | 3.648        | 2.245     | 0.558                 | 0.154     | 0.867              | 0.501     |       |
| 10/14/2013 18:53     | 173_Non-Phe | 13_10_14_1853_06_456 | 1  | 2.679          | 1.811     | 0.860              | 0.096     | 1.920          | 0.268     | 3.648        | 2.232     | 0.558                 | 0.161     | 0.867              | 0.513     |       |
| 10/14/2013 18:54     | 173_Non-Phe | 13_10_14_1854_07_266 | 1  | 2.679          | 1.790     | 0.865              | 0.099     | 1.999          | 0.269     | 3.648        | 2.239     | 0.558                 | 0.164     | 0.867              | 0.545     |       |
| 10/14/2013 18:55     | 173_Non-Phe | 13_10_14_1855_07_977 | 1  | 2.679          | 1.757     | 0.863              | 0.097     | 1.983          | 0.267     | 3.648        | 2.223     | 0.558                 | 0.163     | 0.867              | 0.526     |       |
| 10/14/2013 18:56     | 173_Non-Phe | 13_10_14_1856_08_781 | 1  | 2.679          | 1.803     | 0.781              | 0.099     | 2.158          | 0.302     | 3.648        | 2.206     | 0.558                 | 0.164     | 0.867              | 0.533     |       |
| 10/14/2013 18:57     | 173_Non-Phe | 13_10_14_1857_09_477 | 1  | 2.679          | 1.813     | 0.767              | 0.103     | 2.131          | 0.305     | 3.648        | 2.217     | 0.558                 | 0.170     | 0.867              | 0.537     |       |
| 10/14/2013 18:58     | 173_Non-Phe | 13_10_14_1858_10_311 | 1  | 2.679          | 1.825     | 0.580              | 0.103     | 2.233          | 0.303     | 3.648        | 2.190     | 0.558                 | 0.171     | 0.867              | 0.547     |       |
| Average Conc. (ppm): |             |                      |    | 1              | 2.679     | 1.795              | 0.647     | 0.099          | 2.141     | 0.281        | 3.648     | 2.206                 | 0.558     | 0.164              | 0.867     | 0.531 |

| Company          | ACT            |
|------------------|----------------|
| Analyst Initials | STG            |
| Parameters       | EPA Method 320 |

| Client # | Amory    |
|----------|----------|
| Job #    | 0913-173 |
| sample # | 4        |

|                      |             |                      |   |       |       |       |       |       |       |       |       |       |       |       |       |       |
|----------------------|-------------|----------------------|---|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| 10/15/2013 9:39      | 173_Non-Phe | 13_10_15_0939_54_760 | 1 | 2.679 | 1.013 | 0.205 | 0.062 | 2.663 | 0.082 | 3.648 | 1.684 | 0.558 | 0.103 | 0.867 | 0.323 |       |
| 10/15/2013 9:40      | 173_Non-Phe | 13_10_15_0940_55_571 | 1 | 2.679 | 1.160 | 0.205 | 0.066 | 2.451 | 0.082 | 3.648 | 1.673 | 0.558 | 0.112 | 0.867 | 0.352 |       |
| 10/15/2013 9:41      | 173_Non-Phe | 13_10_15_0941_56_301 | 1 | 2.679 | 1.177 | 0.205 | 0.068 | 2.447 | 0.081 | 3.648 | 1.680 | 0.558 | 0.115 | 0.867 | 0.355 |       |
| 10/15/2013 9:42      | 173_Non-Phe | 13_10_15_0942_57_111 | 1 | 2.679 | 1.144 | 0.205 | 0.067 | 2.647 | 0.083 | 3.648 | 1.679 | 0.558 | 0.110 | 0.867 | 0.345 |       |
| 10/15/2013 9:43      | 173_Non-Phe | 13_10_15_0943_57_921 | 1 | 2.679 | 1.089 | 0.205 | 0.066 | 2.542 | 0.085 | 3.648 | 1.677 | 0.558 | 0.109 | 0.867 | 0.328 |       |
| 10/15/2013 9:44      | 173_Non-Phe | 13_10_15_0944_58_691 | 1 | 2.679 | 1.009 | 0.205 | 0.065 | 2.442 | 0.080 | 3.648 | 1.669 | 0.558 | 0.106 | 0.867 | 0.311 |       |
| 10/15/2013 9:45      | 173_Non-Phe | 13_10_15_0945_59_421 | 1 | 2.679 | 1.133 | 0.205 | 0.065 | 2.511 | 0.081 | 3.648 | 1.679 | 0.558 | 0.111 | 0.867 | 0.351 |       |
| 10/15/2013 9:47      | 173_Non-Phe | 13_10_15_0947_00_071 | 1 | 2.679 | 1.144 | 0.205 | 0.065 | 2.485 | 0.081 | 3.648 | 1.666 | 0.558 | 0.110 | 0.867 | 0.345 |       |
| 10/15/2013 9:48      | 173_Non-Phe | 13_10_15_0948_00_871 | 1 | 2.679 | 1.110 | 0.205 | 0.070 | 2.752 | 0.085 | 3.648 | 1.674 | 0.558 | 0.114 | 0.867 | 0.351 |       |
| 10/15/2013 9:49      | 173_Non-Phe | 13_10_15_0949_01_631 | 1 | 2.679 | 1.199 | 0.205 | 0.069 | 2.687 | 0.083 | 3.648 | 1.693 | 0.558 | 0.118 | 0.867 | 0.367 |       |
| 10/15/2013 9:50      | 173_Non-Phe | 13_10_15_0950_02_421 | 1 | 2.679 | 1.101 | 0.205 | 0.065 | 2.625 | 0.082 | 3.648 | 1.693 | 0.558 | 0.109 | 0.867 | 0.339 |       |
| 10/15/2013 9:51      | 173_Non-Phe | 13_10_15_0951_03_231 | 1 | 2.679 | 1.140 | 0.205 | 0.069 | 2.620 | 0.085 | 3.648 | 1.694 | 0.558 | 0.118 | 0.867 | 0.357 |       |
| 10/15/2013 9:52      | 173_Non-Phe | 13_10_15_0952_03_891 | 1 | 2.679 | 1.142 | 0.205 | 0.063 | 2.899 | 0.085 | 3.648 | 1.693 | 0.558 | 0.110 | 0.867 | 0.345 |       |
| 10/15/2013 9:53      | 173_Non-Phe | 13_10_15_0953_04_722 | 1 | 2.679 | 1.184 | 0.205 | 0.071 | 2.967 | 0.084 | 3.648 | 1.710 | 0.558 | 0.122 | 0.867 | 0.367 |       |
| 10/15/2013 9:54      | 173_Non-Phe | 13_10_15_0954_05_522 | 1 | 2.679 | 1.106 | 0.205 | 0.067 | 2.592 | 0.088 | 3.648 | 1.698 | 0.558 | 0.114 | 0.867 | 0.337 |       |
| 10/15/2013 9:55      | 173_Non-Phe | 13_10_15_0955_06_272 | 1 | 2.679 | 1.112 | 0.205 | 0.067 | 2.715 | 0.083 | 3.648 | 1.704 | 0.558 | 0.114 | 0.867 | 0.357 |       |
| 10/15/2013 9:56      | 173_Non-Phe | 13_10_15_0956_06_992 | 1 | 2.679 | 1.117 | 0.205 | 0.067 | 2.534 | 0.081 | 3.648 | 1.692 | 0.558 | 0.116 | 0.867 | 0.349 |       |
| 10/15/2013 9:57      | 173_Non-Phe | 13_10_15_0957_07_812 | 1 | 2.679 | 1.170 | 0.205 | 0.069 | 2.681 | 0.086 | 3.648 | 1.686 | 0.558 | 0.117 | 0.867 | 0.359 |       |
| 10/15/2013 9:58      | 173_Non-Phe | 13_10_15_0958_08_512 | 1 | 2.679 | 1.039 | 0.205 | 0.066 | 2.749 | 0.087 | 3.648 | 1.697 | 0.558 | 0.109 | 0.867 | 0.320 |       |
| 10/15/2013 9:59      | 173_Non-Phe | 13_10_15_0959_09_312 | 1 | 2.679 | 1.132 | 0.205 | 0.066 | 2.966 | 0.084 | 3.648 | 1.693 | 0.558 | 0.115 | 0.867 | 0.347 |       |
| 10/15/2013 10:00     | 173_Non-Phe | 13_10_15_1000_10_052 | 1 | 2.679 | 1.148 | 0.205 | 0.064 | 3.015 | 0.089 | 3.648 | 1.709 | 0.558 | 0.112 | 0.867 | 0.338 |       |
| 10/15/2013 10:01     | 173_Non-Phe | 13_10_15_1001_10_862 | 1 | 2.679 | 1.131 | 0.205 | 0.064 | 3.014 | 0.087 | 3.648 | 1.720 | 0.558 | 0.114 | 0.867 | 0.362 |       |
| 10/15/2013 10:02     | 173_Non-Phe | 13_10_15_1002_11_672 | 1 | 2.679 | 1.151 | 0.205 | 0.070 | 2.937 | 0.088 | 3.648 | 1.707 | 0.558 | 0.118 | 0.867 | 0.369 |       |
| 10/15/2013 10:03     | 173_Non-Phe | 13_10_15_1003_12_372 | 1 | 2.679 | 1.152 | 0.205 | 0.071 | 2.821 | 0.086 | 3.648 | 1.713 | 0.558 | 0.118 | 0.867 | 0.357 |       |
| 10/15/2013 10:04     | 173_Non-Phe | 13_10_15_1004_13_182 | 1 | 2.679 | 1.131 | 0.205 | 0.068 | 2.896 | 0.088 | 3.648 | 1.699 | 0.558 | 0.114 | 0.867 | 0.350 |       |
| 10/15/2013 10:05     | 173_Non-Phe | 13_10_15_1005_13_993 | 1 | 2.679 | 1.163 | 0.205 | 0.066 | 2.921 | 0.089 | 3.648 | 1.697 | 0.558 | 0.114 | 0.867 | 0.358 |       |
| 10/15/2013 10:06     | 173_Non-Phe | 13_10_15_1006_14_753 | 1 | 2.679 | 1.163 | 0.205 | 0.071 | 2.603 | 0.084 | 3.648 | 1.694 | 0.558 | 0.116 | 0.867 | 0.362 |       |
| 10/15/2013 10:07     | 173_Non-Phe | 13_10_15_1007_15_483 | 1 | 2.679 | 1.099 | 0.205 | 0.064 | 2.536 | 0.085 | 3.648 | 1.694 | 0.558 | 0.109 | 0.867 | 0.338 |       |
| 10/15/2013 10:08     | 173_Non-Phe | 13_10_15_1008_16_293 | 1 | 2.679 | 1.191 | 0.205 | 0.067 | 2.761 | 0.084 | 3.648 | 1.684 | 0.558 | 0.116 | 0.867 | 0.361 |       |
| 10/15/2013 10:09     | 173_Non-Phe | 13_10_15_1009_17_143 | 1 | 2.679 | 1.109 | 0.205 | 0.064 | 2.733 | 0.083 | 3.648 | 1.692 | 0.558 | 0.110 | 0.867 | 0.345 |       |
| 10/15/2013 10:10     | 173_Non-Phe | 13_10_15_1010_17_863 | 1 | 2.679 | 1.160 | 0.205 | 0.067 | 2.628 | 0.083 | 3.648 | 1.664 | 0.558 | 0.114 | 0.867 | 0.350 |       |
| 10/15/2013 10:11     | 173_Non-Phe | 13_10_15_1011_18_623 | 1 | 2.679 | 1.033 | 0.205 | 0.066 | 0.291 | 0.039 | 3.648 | 0.417 | 0.558 | 0.111 | 0.867 | 0.324 |       |
| Average Conc. (ppm): |             |                      |   | 1     | 2.685 | 1.133 | 0.205 | 0.067 | 2.622 | 0.083 | 3.648 | 1.663 | 0.558 | 0.114 | 0.867 | 0.350 |

| GHM Run 2            |             |                      |    |                |           |                    |           |                |           |              |           |                       |           |                    |           |       |  |
|----------------------|-------------|----------------------|----|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|-----------|-----------------------|-----------|--------------------|-----------|-------|--|
| Date                 | Method      | Filename             | DF | Acrolein (ppm) | SEC (ppm) | Formaldehyde (ppm) | SEC (ppm) | Methanol (ppm) | SEC (ppm) | Phenol (ppm) | SEC (ppm) | Propionaldehyde (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) |       |  |
| 10/15/2013 10:22     | 173_Non-Phe | 13_10_15_1022_26_154 | 1  | 2.679          | 1.092     | 0.205              | 0.070     | 3.039          | 0.088     | 3.648        | 1.720     | 0.558                 | 0.118     | 0.867              | 0.342     |       |  |
| 10/15/2013 10:23     | 173_Non-Phe | 13_10_15_1023_26_864 | 1  | 2.679          | 1.077     | 0.205              | 0.065     | 3.115          | 0.090     | 3.648        | 1.722     | 0.558                 | 0.112     | 0.867              | 0.332     |       |  |
| 10/15/2013 10:24     | 173_Non-Phe | 13_10_15_1024_27_684 | 1  | 2.679          | 1.166     | 0.205              | 0.065     | 3.097          | 0.091     | 3.648        | 1.717     | 0.558                 | 0.113     | 0.867              | 0.342     |       |  |
| 10/15/2013 10:25     | 173_Non-Phe | 13_10_15_1025_28_404 | 1  | 2.679          | 1.154     | 0.205              | 0.071     | 2.972          | 0.090     | 3.648        | 1.718     | 0.558                 | 0.120     | 0.867              | 0.358     |       |  |
| 10/15/2013 10:26     | 173_Non-Phe | 13_10_15_1026_29_214 | 1  | 2.679          | 1.221     | 0.205              | 0.064     | 2.788          | 0.087     | 3.648        | 1.712     | 0.558                 | 0.111     | 0.867              | 0.345     |       |  |
| 10/15/2013 10:27     | 173_Non-Phe | 13_10_15_1027_30_044 | 1  | 2.679          | 1.079     | 0.205              | 0.064     | 2.669          | 0.083     | 3.648        | 1.705     | 0.558                 | 0.109     | 0.867              | 0.317     |       |  |
| 10/15/2013 10:28     | 173_Non-Phe | 13_10_15_1028_30_805 | 1  | 2.679          | 1.154     | 0.205              | 0.069     | 2.757          | 0.086     | 3.648        | 1.699     | 0.558                 | 0.113     | 0.867              | 0.367     |       |  |
| 10/15/2013 10:29     | 173_Non-Phe | 13_10_15_1029_31_375 | 1  | 2.679          | 1.175     | 0.205              | 0.068     | 2.836          | 0.088     | 3.648        | 1.710     | 0.558                 | 0.115     | 0.867              | 0.352     |       |  |
| 10/15/2013 10:30     | 173_Non-Phe | 13_10_15_1030_32_205 | 1  | 2.679          | 1.150     | 0.205              | 0.073     | 2.951          | 0.085     | 3.648        | 1.713     | 0.558                 | 0.121     | 0.867              | 0.367     |       |  |
| 10/15/2013 10:31     | 173_Non-Phe | 13_10_15_1031_32_965 | 1  | 2.679          | 1.084     | 0.205              | 0.067     | 3.028          | 0.088     | 3.648        | 1.714     | 0.558                 | 0.114     | 0.867              | 0.351     |       |  |
| 10/15/2013 10:32     | 173_Non-Phe | 13_10_15_1032_33_755 | 1  | 2.679          | 1.087     | 0.205              | 0.063     | 3.113          | 0.087     | 3.648        | 1.715     | 0.558                 | 0.111     | 0.867              | 0.333     |       |  |
| 10/15/2013 10:33     | 173_Non-Phe | 13_10_15_1033_34_495 | 1  | 2.679          | 1.097     | 0.205              | 0.073     | 3.267          | 0.091     | 3.648        | 1.730     | 0.558                 | 0.122     | 0.867              | 0.352     |       |  |
| 10/15/2013 10:34     | 173_Non-Phe | 13_10_15_1034_35_205 | 1  | 2.679          | 1.143     | 0.205              | 0.070     | 3.379          | 0.092     | 3.648        | 1.736     | 0.558                 | 0.119     | 0.867              | 0.350     |       |  |
| 10/15/2013 10:35     | 173_Non-Phe | 13_10_15_1035_35_975 | 1  | 2.679          | 1.088     | 0.205              | 0.072     | 3.379          | 0.091     | 3.648        | 1.748     | 0.558                 | 0.119     | 0.867              | 0.340     |       |  |
| 10/15/2013 10:36     | 173_Non-Phe | 13_10_15_1036_36_815 | 1  | 2.679          | 1.116     | 0.205              | 0.065     | 3.402          | 0.093     | 3.648        | 1.743     | 0.558                 | 0.114     | 0.867              | 0.340     |       |  |
| 10/15/2013 10:37     | 173_Non-Phe | 13_10_15_1037_37_575 | 1  | 2.679          | 1.199     | 0.205              | 0.067     | 3.127          | 0.090     | 3.648        | 1.735     | 0.558                 | 0.116     | 0.867              | 0.356     |       |  |
| 10/15/2013 10:38     | 173_Non-Phe | 13_10_15_1038_38_255 | 1  | 2.679          | 1.142     | 0.205              | 0.068     | 3.188          | 0.089     | 3.648        | 1.735     | 0.558                 | 0.115     | 0.867              | 0.356     |       |  |
| 10/15/2013 10:39     | 173_Non-Phe | 13_10_15_1039_39_115 | 1  | 2.679          | 1.161     | 0.205              | 0.066     | 3.324          | 0.093     | 3.648        | 1.739     | 0.558                 | 0.119     | 0.867              | 0.350     |       |  |
| 10/15/2013 10:40     | 173_Non-Phe | 13_10_15_1040_39_786 | 1  | 2.679          | 1.205     | 0.205              | 0.068     | 3.262          | 0.088     | 3.648        | 1.741     | 0.558                 | 0.119     | 0.867              | 0.362     |       |  |
| 10/15/2013 10:41     | 173_Non-Phe | 13_10_15_1041_40_576 | 1  | 2.679          | 1.145     | 0.205              | 0.070     | 2.950          | 0.090     | 3.648        | 1.733     | 0.558                 | 0.119     | 0.867              | 0.366     |       |  |
| 10/15/2013 10:42     | 173_Non-Phe | 13_10_15_1042_41_326 | 1  | 2.679          | 1.197     | 0.205              | 0.068     | 2.834          | 0.084     | 3.648        | 1.732     | 0.558                 | 0.116     | 0.867              | 0.353     |       |  |
| 10/15/2013 10:43     | 173_Non-Phe | 13_10_15_1043_42_126 | 1  | 2.679          | 1.081     | 0.205              | 0.070     | 2.758          | 0.084     | 3.648        | 1.723     | 0.558                 | 0.115     | 0.867              | 0.364     |       |  |
| 10/15/2013 10:44     | 173_Non-Phe | 13_10_15_1044_42_866 | 1  | 2.679          | 1.088     | 0.205              | 0.066     | 2.600          | 0.082     | 3.648        | 1.715     | 0.558                 | 0.110     | 0.867              | 0.331     |       |  |
| 10/15/2013 10:45     | 173_Non-Phe | 13_10_15_1045_43_686 | 1  | 2.679          | 1.093     | 0.205              | 0.066     | 2.682          | 0.088     | 3.648        | 1.721     | 0.558                 | 0.112     | 0.867              | 0.340     |       |  |
| 10/15/2013 10:46     | 173_Non-Phe | 13_10_15_1046_44_456 | 1  | 2.679          | 1.063     | 0.205              | 0.069     | 2.635          | 0.084     | 3.648        | 1.690     | 0.558                 | 0.115     | 0.867              | 0.358     |       |  |
| 10/15/2013 10:47     | 173_Non-Phe | 13_10_15_1047_45_156 | 1  | 2.679          | 1.135     | 0.205              | 0.066     | 2.513          | 0.081     | 3.648        | 1.695     | 0.558                 | 0.111     | 0.867              | 0.344     |       |  |
| 10/15/2013 10:48     | 173_Non-Phe | 13_10_15_1048_45_966 | 1  | 2.679          | 1.117     | 0.205              | 0.068     | 2.401          | 0.081     | 3.648        | 1.680     | 0.558                 | 0.114     | 0.867              | 0.347     |       |  |
| 10/15/2013 10:49     | 173_Non-Phe | 13_10_15_1049_46_776 | 1  | 2.679          | 1.069     | 0.205              | 0.063     | 2.293          | 0.081     | 3.648        | 1.691     | 0.558                 | 0.109     | 0.867              | 0.327     |       |  |
| 10/15/2013 10:50     | 173_Non-Phe | 13_10_15_1050_47_546 | 1  | 2.679          | 1.033     | 0.205              | 0.063     | 2.338          | 0.084     | 3.648        | 1.676     | 0.558                 | 0.109     | 0.867              | 0.330     |       |  |
| 10/15/2013 10:51     | 173_Non-Phe | 13_10_15_1051_48_286 | 1  | 2.679          | 1.091     | 0.205              | 0.069     | 2.362          | 0.079     | 3.648        | 1.695     | 0.558                 | 0.116     | 0.867              | 0.341     |       |  |
| 10/15/2013 10:52     | 173_Non-Phe | 13_10_15_1052_49_107 | 1  | 2.679          | 1.219     | 0.205              | 0.065     | 2.019          | 0.078     | 3.648        | 1.680     | 0.558                 | 0.114     | 0.867              | 0.356     |       |  |
| 10/15/2013 10:53     | 173_Non-Phe | 13_10_15_1053_49_787 | 1  | 2.679          | 1.088     | 0.205              | 0.065     | 2.083          | 0.081     | 3.648        | 1.673     | 0.558                 | 0.111     | 0.867              | 0.329     |       |  |
| 10/15/2013 10:54     | 173_Non-Phe | 13_10_15_1054_50_637 | 1  | 2.679          | 1.122     | 0.205              | 0.067     | 2.367          | 0.083     | 3.648        | 1.695     | 0.558                 | 0.117     | 0.867              | 0.348     |       |  |
| 10/15/2013 10:55     | 173_Non-Phe | 13_10_15_1055_51_347 | 1  | 2.679          | 1.237     | 0.205              | 0.067     | 2.457          | 0.086     | 3.648        | 1.704     | 0.558                 | 0.125     | 0.867              | 0.368     |       |  |
| 10/15/2013 10:56     | 173_Non-Phe | 13_10_15_1056_52_137 | 1  | 2.679          | 1.134     | 0.205              | 0.072     | 2.315          | 0.082     | 3.648        | 1.713     | 0.558                 | 0.121     | 0.867              | 0.359     |       |  |
| 10/15/2013 10:57     | 173_Non-Phe | 13_10_15_1057_52_947 | 1  | 2.679          | 1.190     | 0.205              | 0.070     | 2.277          | 0.085     | 3.648        | 1.705     | 0.558                 | 0.125     | 0.867              | 0.378     |       |  |
| 10/15/2013 10:58     | 173_Non-Phe | 13_10_15_1058_53_697 | 1  | 2.679          | 1.179     | 0.205              | 0.068     | 2.679          | 0.086     | 3.648        | 1.714     | 0.558                 | 0.127     | 0.867              | 0.354     |       |  |
| 10/15/2013 10:59     | 173_Non-Phe | 13_10_15_1059_54_147 | 1  | 2.679          | 1.081     | 0.205              | 0.067     | 2.435          | 0.082     | 3.648        | 1.722     | 0.558                 | 0.118     | 0.867              | 0.350     |       |  |
| 10/15/2013 11:00     | 173_Non-Phe | 13_10_15_1100_55_187 | 1  | 2.679          | 1.126     | 0.205              | 0.063     | 2.651          | 0.086     | 3.648        | 1.735     | 0.558                 | 0.114     | 0.867              | 0.343     |       |  |
| 10/15/2013 11:01     | 173_Non-Phe | 13_10_15_1101_55_987 | 1  | 2.679          | 1.090     | 0.205              | 0.064     | 2.701          | 0.085     | 3.648        | 1.733     | 0.558                 | 0.115     | 0.867              | 0.322     |       |  |
| 10/15/2013 11:02     | 173_Non-Phe | 13_10_15_1102_56_697 | 1  | 2.679          | 1.129     | 0.205              | 0.068     | 2.614          | 0.081     | 3.648        | 1.726     | 0.558                 | 0.118     | 0.867              | 0.352     |       |  |
| 10/15/2013 11:03     | 173_Non-Phe | 13_10_15_1103_57_478 | 1  | 2.679          | 1.123     | 0.205              | 0.070     | 2.850          | 0.083     | 3.648        | 1.731     | 0.558                 | 0.121     | 0.867              | 0.348     |       |  |
| 10/15/2013 11:04     | 173_Non-Phe | 13_10_15_1104_58_198 | 1  | 2.745          | 1.132     | 0.205              | 0.070     | 3.000          | 0.088     | 3.648        | 1.746     | 0.558                 | 0.123     | 0.867              | 0.351     |       |  |
| 10/15/2013 11:05     | 173_Non-Phe | 13_10_15_1105_59_018 | 1  | 2.679          | 1.211     | 0.205              | 0.068     | 2.679          | 0.086     | 3.648        | 1.739     | 0.558                 | 0.123     | 0.867              | 0.361     |       |  |
| 10/15/2013 11:06     | 173_Non-Phe | 13_10_15_1106_59_828 | 1  | 2.679          | 1.081     | 0.205              | 0.065     | 2.455          | 0.084     | 3.648        | 1.721     | 0.558                 | 0.108     | 0.867              | 0.334     |       |  |
| 10/15/2013 11:08     | 173_Non-Phe | 13_10_15_1108_00_548 | 1  | 2.679          | 1.164     | 0.205              | 0.064     | 2.309          | 0.081     | 3.648        | 1.709     | 0.558                 | 0.112     | 0.867              | 0.344     |       |  |
| 10/15/2013 11:09     | 173_Non-Phe | 13_10_15_1109_00_358 | 1  | 2.679          | 1.157     | 0.205              | 0.063     | 2.235          | 0.081     | 3.648        | 1.692     | 0.558                 | 0.109     | 0.867              | 0.341     |       |  |
| 10/15/2013 11:10     | 173_Non-Phe | 13_10_15_1110_02_070 | 1  | 2.679          | 1.213     | 0.205              | 0.068     | 2.670          | 0.088     | 3.648        | 1.703     | 0.558                 | 0.120     | 0.867              | 0.361     |       |  |
| 10/15/2013 11:11     | 173_Non-Phe | 13_10_15_1111_02_548 | 1  | 2.679          | 1.160     | 0.205              | 0.064     | 2.475          | 0.080     | 3.648        | 1.699     | 0.558                 | 0.113     | 0.867              | 0.343     |       |  |
| 10/15/2013 11:12     | 173_Non-Phe | 13_10_15_1112_03_558 | 1  | 2.679          | 1.119     | 0.205              | 0.068     | 2.494          | 0.082     | 3.648        | 1.700     | 0.558                 | 0.112     | 0.867              | 0.347     |       |  |
| 10/15/2013 11:13     | 173_Non-Phe | 13_10_15_1113_04_308 | 1  | 2.679          | 1.169     | 0.205              | 0.066     | 2.392          | 0.081     | 3.648        | 1.700     | 0.558                 | 0.113     | 0.867              | 0.364     |       |  |
| 10/15/2013 11:14     | 173_Non-Phe | 13_10_15_1114_05_028 | 1  | 2.679          | 1.118     | 0.205              | 0.069     | 2.472          | 0.079     | 3.648        | 1.692     | 0.558                 | 0.116     | 0.867              | 0.361     |       |  |
| 10/15/2013 11:15     | 173_Non-Phe | 13_10_15_1115_05_778 | 1  | 2.679          | 1.171     | 0.205              | 0.065     | 2.464          | 0.082     | 3.648        | 1.692     | 0.558                 | 0.112     | 0.867              | 0.348     |       |  |
| 10/15/2013 11:16     | 173_Non-Phe | 13_10_15_1116_06_589 | 1  | 2.679          | 1.152     | 0.205              | 0.065     | 2.626          | 0.082     | 3.648        | 1.712     | 0.558                 | 0.112     | 0.867              | 0.344     |       |  |
| 10/15/2013 11:17     | 173_Non-Phe | 13_10_15_1117_07_339 | 1  | 2.679          | 1.088     | 0.205              | 0.067     | 2.795          | 0.086     | 3.648        | 1.732     | 0.558                 | 0.114     | 0.867              | 0.345     |       |  |
| 10/15/2013 11:18     | 173_Non-Phe | 13_10_15_1118_08_079 | 1  | 2.679          | 1.077     | 0.205              | 0.070     | 2.844          | 0.086     | 3.648        | 1.731     | 0.558                 | 0.115     | 0.867              | 0.360     |       |  |
| 10/15/2013 11:19     | 173_Non-Phe | 13_10_15_1119_08_799 | 1  | 2.679          | 1.059     | 0.205              | 0.069     | 2.666          | 0.085     | 3.648        | 1.717     | 0.558                 | 0.113     | 0.867              | 0.353     |       |  |
| 10/15/2013 11:20     | 173_Non-Phe | 13_10_15_1120_09_638 | 1  | 2.679          | 1.124     | 0.205              | 0.067     | 2.507          | 0.085     | 3.648        | 1.729     | 0.558                 | 0.115     | 0.867              | 0.347     |       |  |
| 10/15/2013 11:21     | 173_Non-Phe | 13_10_15_1121_10_368 | 1  | 2.679          | 1.044     | 0.205              | 0.066     | 2.675          | 0.085     | 3.648        | 1.718     | 0.558                 | 0.113     | 0.867              | 0.334     |       |  |
| 10/15/2013 11:22     | 173_Non-Phe | 13_10_15_1122_11_139 | 1  | 2.679          | 1.134     | 0.205              | 0.062     | 1.687          | 0.064     | 3.648        | 1.325     | 0.558                 | 0.108     | 0.867              | 0.347     |       |  |
| Average Conc. (ppm): |             |                      |    | 1              | 2.680     | 1.130              | 0.205     | 0.067          | 2.686     | 0.085        | 3.648     | 1.708                 | 0.558     | 0.115              | 0.867     | 0.348 |  |

| Company/ACT<br>Analyst Initials<br>Parameters/EPA Method 320 |        |          |       |                |           |                    |           |                |           |              |           | Client #/Amory<br>Job #/0913-173<br>sample #/4 |           |                    |           |
|--------------------------------------------------------------|--------|----------|-------|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|-----------|------------------------------------------------|-----------|--------------------|-----------|
| 10/15/2013 11:50 173_Non-Phe 13_10_15_1150_32_751            | 1      | 2.679    | 1.120 | 0.205          | 0.070     | 2.672              | 0.082     | 3.648          | 1.713     | 0.558        | 0.120     | 0.867                                          | 0.356     |                    |           |
| 10/15/2013 11:51 173_Non-Phe 13_10_15_1151_33_422            | 1      | 2.679    | 1.225 | 0.205          | 0.068     | 2.686              | 0.084     | 3.648          | 1.706     | 0.558        | 0.122     | 0.867                                          | 0.360     |                    |           |
| 10/15/2013 11:52 173_Non-Phe 13_10_15_1152_34_122            | 1      | 2.679    | 1.106 | 0.205          | 0.068     | 3.032              | 0.082     | 3.648          | 1.736     | 0.558        | 0.122     | 0.867                                          | 0.344     |                    |           |
| 10/15/2013 11:53 173_Non-Phe 13_10_15_1153_34_872            | 1      | 2.679    | 1.182 | 0.205          | 0.070     | 3.084              | 0.084     | 3.648          | 1.730     | 0.558        | 0.125     | 0.867                                          | 0.350     |                    |           |
| 10/15/2013 11:54 173_Non-Phe 13_10_15_1154_35_682            | 1      | 2.679    | 1.191 | 0.205          | 0.069     | 2.978              | 0.087     | 3.648          | 1.739     | 0.558        | 0.123     | 0.867                                          | 0.360     |                    |           |
| 10/15/2013 11:55 173_Non-Phe 13_10_15_1155_36_432            | 1      | 2.679    | 1.079 | 0.205          | 0.065     | 3.083              | 0.084     | 3.648          | 1.733     | 0.558        | 0.119     | 0.867                                          | 0.346     |                    |           |
| 10/15/2013 11:56 173_Non-Phe 13_10_15_1156_37_172            | 1      | 2.679    | 1.128 | 0.205          | 0.070     | 2.930              | 0.085     | 3.648          | 1.735     | 0.558        | 0.124     | 0.867                                          | 0.348     |                    |           |
| 10/15/2013 11:57 173_Non-Phe 13_10_15_1157_37_932            | 1      | 2.679    | 1.112 | 0.205          | 0.070     | 3.056              | 0.086     | 3.648          | 1.742     | 0.558        | 0.125     | 0.867                                          | 0.362     |                    |           |
| 10/15/2013 11:58 173_Non-Phe 13_10_15_1158_38_682            | 1      | 2.679    | 1.129 | 0.205          | 0.071     | 3.313              | 0.086     | 3.648          | 1.748     | 0.558        | 0.129     | 0.867                                          | 0.346     |                    |           |
| 10/15/2013 11:59 173_Non-Phe 13_10_15_1159_39_342            | 1      | 2.679    | 1.170 | 0.205          | 0.072     | 3.185              | 0.087     | 3.648          | 1.759     | 0.558        | 0.132     | 0.867                                          | 0.359     |                    |           |
| 10/15/2013 12:00 173_Non-Phe 13_10_15_1200_40_092            | 1      | 2.679    | 1.131 | 0.205          | 0.063     | 2.746              | 0.084     | 3.648          | 1.738     | 0.558        | 0.115     | 0.867                                          | 0.340     |                    |           |
| 10/15/2013 12:01 173_Non-Phe 13_10_15_1201_40_852            | 1      | 2.679    | 1.131 | 0.205          | 0.066     | 2.902              | 0.086     | 3.648          | 1.741     | 0.558        | 0.117     | 0.867                                          | 0.341     |                    |           |
| 10/15/2013 12:02 173_Non-Phe 13_10_15_1202_41_642            | 1      | 2.679    | 1.115 | 0.205          | 0.070     | 2.981              | 0.083     | 3.648          | 1.727     | 0.558        | 0.119     | 0.867                                          | 0.341     |                    |           |
| 10/15/2013 12:03 173_Non-Phe 13_10_15_1203_42_383            | 1      | 2.679    | 1.070 | 0.205          | 0.067     | 2.979              | 0.085     | 3.648          | 1.724     | 0.558        | 0.118     | 0.867                                          | 0.338     |                    |           |
| 10/15/2013 12:04 173_Non-Phe 13_10_15_1204_43_183            | 1      | 2.679    | 1.126 | 0.205          | 0.068     | 3.046              | 0.086     | 3.648          | 1.730     | 0.558        | 0.122     | 0.867                                          | 0.361     |                    |           |
| 10/15/2013 12:05 173_Non-Phe 13_10_15_1205_43_893            | 1      | 2.679    | 1.114 | 0.205          | 0.069     | 2.800              | 0.085     | 3.648          | 1.729     | 0.558        | 0.119     | 0.867                                          | 0.355     |                    |           |
| 10/15/2013 12:06 173_Non-Phe 13_10_15_1206_44_713            | 1      | 2.679    | 1.071 | 0.205          | 0.064     | 2.783              | 0.082     | 3.648          | 1.716     | 0.558        | 0.112     | 0.867                                          | 0.325     |                    |           |
| 10/15/2013 12:07 173_Non-Phe 13_10_15_1207_45_493            | 1      | 2.679    | 1.034 | 0.205          | 0.062     | 2.905              | 0.083     | 3.648          | 1.726     | 0.558        | 0.112     | 0.867                                          | 0.319     |                    |           |
| 10/15/2013 12:08 173_Non-Phe 13_10_15_1208_46_233            | 1      | 2.679    | 1.075 | 0.205          | 0.066     | 3.030              | 0.082     | 3.648          | 1.730     | 0.558        | 0.116     | 0.867                                          | 0.344     |                    |           |
| 10/15/2013 12:09 173_Non-Phe 13_10_15_1209_46_983            | 1      | 2.679    | 1.090 | 0.205          | 0.061     | 2.758              | 0.083     | 3.648          | 1.719     | 0.558        | 0.111     | 0.867                                          | 0.333     |                    |           |
| 10/15/2013 12:10 173_Non-Phe 13_10_15_1210_47_703            | 1      | 2.679    | 1.073 | 0.205          | 0.064     | 2.795              | 0.080     | 3.648          | 1.715     | 0.558        | 0.109     | 0.867                                          | 0.339     |                    |           |
| 10/15/2013 12:11 173_Non-Phe 13_10_15_1211_48_473            | 1      | 2.679    | 1.033 | 0.205          | 0.060     | 2.824              | 0.083     | 3.648          | 1.720     | 0.558        | 0.108     | 0.867                                          | 0.312     |                    |           |
| 10/15/2013 12:12 173_Non-Phe 13_10_15_1212_49_233            | 1      | 2.679    | 1.036 | 0.205          | 0.064     | 2.739              | 0.080     | 3.648          | 1.726     | 0.558        | 0.110     | 0.867                                          | 0.342     |                    |           |
| 10/15/2013 12:13 173_Non-Phe 13_10_15_1213_50_073            | 1      | 2.679    | 1.140 | 0.205          | 0.063     | 2.921              | 0.082     | 3.648          | 1.730     | 0.558        | 0.113     | 0.867                                          | 0.334     |                    |           |
| 10/15/2013 12:14 173_Non-Phe 13_10_15_1214_50_783            | 1      | 2.679    | 1.117 | 0.205          | 0.063     | 2.963              | 0.083     | 3.648          | 1.726     | 0.558        | 0.112     | 0.867                                          | 0.335     |                    |           |
| 10/15/2013 12:15 173_Non-Phe 13_10_15_1215_51_544            | 1      | 2.679    | 1.105 | 0.205          | 0.062     | 2.839              | 0.080     | 3.648          | 1.732     | 0.558        | 0.111     | 0.867                                          | 0.338     |                    |           |
| 10/15/2013 12:16 173_Non-Phe 13_10_15_1216_52_314            | 1      | 2.679    | 1.038 | 0.205          | 0.065     | 2.898              | 0.081     | 3.648          | 1.717     | 0.558        | 0.115     | 0.867                                          | 0.325     |                    |           |
| 10/15/2013 12:17 173_Non-Phe 13_10_15_1217_53_134            | 1      | 2.679    | 1.085 | 0.205          | 0.067     | 2.911              | 0.082     | 3.648          | 1.725     | 0.558        | 0.119     | 0.867                                          | 0.341     |                    |           |
| 10/15/2013 12:18 173_Non-Phe 13_10_15_1218_53_834            | 1      | 2.679    | 1.100 | 0.205          | 0.064     | 2.922              | 0.082     | 3.648          | 1.731     | 0.558        | 0.118     | 0.867                                          | 0.330     |                    |           |
| 10/15/2013 12:19 173_Non-Phe 13_10_15_1219_54_644            | 1      | 2.679    | 1.042 | 0.205          | 0.065     | 2.851              | 0.082     | 3.648          | 1.735     | 0.558        | 0.114     | 0.867                                          | 0.334     |                    |           |
| 10/15/2013 12:20 173_Non-Phe 13_10_15_1220_55_414            | 1      | 2.679    | 1.053 | 0.205          | 0.066     | 2.920              | 0.084     | 3.648          | 1.740     | 0.558        | 0.122     | 0.867                                          | 0.332     |                    |           |
| 10/15/2013 12:21 173_Non-Phe 13_10_15_1221_56_164            | 1      | 2.679    | 1.162 | 0.205          | 0.069     | 2.670              | 0.084     | 3.648          | 1.730     | 0.558        | 0.123     | 0.867                                          | 0.349     |                    |           |
| 10/15/2013 12:22 173_Non-Phe 13_10_15_1222_56_874            | 1      | 2.679    | 1.045 | 0.205          | 0.065     | 2.597              | 0.083     | 3.648          | 1.732     | 0.558        | 0.114     | 0.867                                          | 0.331     |                    |           |
| 10/15/2013 12:23 173_Non-Phe 13_10_15_1223_57_684            | 1      | 2.679    | 1.037 | 0.205          | 0.066     | 2.881              | 0.084     | 3.648          | 1.732     | 0.558        | 0.121     | 0.867                                          | 0.320     |                    |           |
| 10/15/2013 12:24 173_Non-Phe 13_10_15_1224_58_414            | 1      | 2.679    | 1.107 | 0.205          | 0.067     | 3.059              | 0.088     | 3.648          | 1.746     | 0.558        | 0.123     | 0.867                                          | 0.349     |                    |           |
| 10/15/2013 12:25 173_Non-Phe 13_10_15_1225_59_224            | 1      | 2.679    | 1.017 | 0.205          | 0.068     | 2.945              | 0.088     | 3.648          | 1.744     | 0.558        | 0.122     | 0.867                                          | 0.327     |                    |           |
| 10/15/2013 12:27 173_Non-Phe 13_10_15_1227_00_014            | 1      | 2.679    | 1.189 | 0.205          | 0.067     | 2.909              | 0.086     | 3.648          | 1.764     | 0.558        | 0.124     | 0.867                                          | 0.354     |                    |           |
| 10/15/2013 12:29 173_Non-Phe 13_10_15_1229_11_590            | 1      | 2.679    | 1.145 | 0.205          | 0.066     | 3.035              | 0.087     | 3.648          | 1.762     | 0.558        | 0.126     | 0.867                                          | 0.339     |                    |           |
| 10/15/2013 12:30 173_Non-Phe 13_10_15_1230_12_390            | 1      | 2.679    | 1.077 | 0.205          | 0.074     | 3.034              | 0.089     | 3.648          | 1.756     | 0.558        | 0.130     | 0.867                                          | 0.347     |                    |           |
| 10/15/2013 12:31 173_Non-Phe 13_10_15_1231_13_200            | 1      | 2.679    | 1.115 | 0.205          | 0.069     | 3.016              | 0.088     | 3.648          | 1.759     | 0.558        | 0.125     | 0.867                                          | 0.343     |                    |           |
| 10/15/2013 12:32 173_Non-Phe 13_10_15_1232_13_940            | 1      | 2.679    | 1.064 | 0.205          | 0.069     | 2.885              | 0.085     | 3.648          | 1.755     | 0.558        | 0.130     | 0.867                                          | 0.342     |                    |           |
| 10/15/2013 12:33 173_Non-Phe 13_10_15_1233_14_750            | 1      | 2.679    | 1.247 | 0.205          | 0.068     | 2.949              | 0.086     | 3.648          | 1.743     | 0.558        | 0.132     | 0.867                                          | 0.368     |                    |           |
| 10/15/2013 12:34 173_Non-Phe 13_10_15_1234_15_450            | 1      | 2.679    | 1.043 | 0.205          | 0.070     | 2.936              | 0.089     | 3.648          | 1.754     | 0.558        | 0.127     | 0.867                                          | 0.340     |                    |           |
| 10/15/2013 12:35 173_Non-Phe 13_10_15_1235_16_170            | 1      | 2.679    | 1.205 | 0.205          | 0.069     | 3.033              | 0.088     | 3.648          | 1.779     | 0.558        | 0.134     | 0.867                                          | 0.352     |                    |           |
| 10/15/2013 12:36 173_Non-Phe 13_10_15_1236_16_880            | 1      | 2.679    | 1.147 | 0.205          | 0.069     | 3.016              | 0.090     | 3.648          | 1.774     | 0.558        | 0.133     | 0.867                                          | 0.349     |                    |           |
| 10/15/2013 12:37 173_Non-Phe 13_10_15_1237_17_630            | 1      | 2.679    | 1.050 | 0.205          | 0.070     | 2.967              | 0.088     | 3.648          | 1.776     | 0.558        | 0.132     | 0.867                                          | 0.347     |                    |           |
| 10/15/2013 12:38 173_Non-Phe 13_10_15_1238_18_480            | 1      | 2.679    | 1.124 | 0.205          | 0.068     | 2.996              | 0.088     | 3.648          | 1.762     | 0.558        | 0.130     | 0.867                                          | 0.354     |                    |           |
| 10/15/2013 12:39 173_Non-Phe 13_10_15_1239_19_230            | 1      | 2.679    | 1.154 | 0.205          | 0.070     | 2.884              | 0.089     | 3.648          | 1.776     | 0.558        | 0.130     | 0.867                                          | 0.353     |                    |           |
| 10/15/2013 12:40 173_Non-Phe 13_10_15_1240_19_910            | 1      | 2.679    | 1.146 | 0.205          | 0.071     | 2.915              | 0.090     | 3.648          | 1.778     | 0.558        | 0.137     | 0.867                                          | 0.363     |                    |           |
| Average Conc. (ppm):                                         | 1      | 2.688    | 1.114 | 0.205          | 0.067     | 2.909              | 0.085     | 3.648          | 1.736     | 0.558        | 0.121     | 0.867                                          | 0.345     |                    |           |
| DHM Run 1                                                    |        |          |       |                |           |                    |           |                |           |              |           |                                                |           |                    |           |
| Date                                                         | Method | Filename | DF    | Acrolein (ppm) | SEC (ppm) | Formaldehyde (ppm) | SEC (ppm) | Methanol (ppm) | SEC (ppm) | Phenol (ppm) | SEC (ppm) | Propionaldehyde (ppm)                          | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) |
| 10/15/2013 13:48 173_Non-Phe 13_10_15_1348_28_550            | 1      | 2.679    | 1.033 | 0.205          | 0.078     | 0.907              | 0.077     | 3.648          | 1.559     | 0.558        | 0.237     | 0.867                                          | 0.321     |                    |           |
| 10/15/2013 13:49 173_Non-Phe 13_10_15_1349_29_260            | 1      | 2.679    | 1.141 | 0.205          | 0.080     | 0.935              | 0.079     | 3.648          | 1.561     | 0.558        | 0.245     | 0.867                                          | 0.353     |                    |           |
| 10/15/2013 13:50 173_Non-Phe 13_10_15_1350_30_070            | 1      | 2.679    | 1.039 | 0.205          | 0.077     | 1.000              | 0.079     | 3.648          | 1.575     | 0.558        | 0.231     | 0.867                                          | 0.317     |                    |           |
| 10/15/2013 13:51 173_Non-Phe 13_10_15_1351_30_870            | 1      | 2.679    | 1.055 | 0.205          | 0.078     | 0.995              | 0.078     | 3.648          | 1.566     | 0.558        | 0.231     | 0.867                                          | 0.335     |                    |           |
| 10/15/2013 13:52 173_Non-Phe 13_10_15_1352_31_591            | 1      | 2.679    | 1.103 | 0.205          | 0.079     | 0.980              | 0.078     | 3.648          | 1.566     | 0.558        | 0.241     | 0.867                                          | 0.337     |                    |           |
| 10/15/2013 13:53 173_Non-Phe 13_10_15_1353_32_351            | 1      | 2.679    | 1.072 | 0.205          | 0.078     | 0.994              | 0.078     | 3.648          | 1.571     | 0.558        | 0.242     | 0.867                                          | 0.332     |                    |           |
| 10/15/2013 13:54 173_Non-Phe 13_10_15_1354_33_161            | 1      | 2.679    | 1.103 | 0.205          | 0.079     | 1.020              | 0.077     | 3.648          | 1.573     | 0.558        | 0.244     | 0.867                                          | 0.323     |                    |           |
| 10/15/2013 13:55 173_Non-Phe 13_10_15_1355_33_891            | 1      | 2.679    | 1.049 | 0.205          | 0.076     | 0.984              | 0.080     | 3.648          | 1.567     | 0.558        | 0.226     | 0.867                                          | 0.331     |                    |           |
| 10/15/2013 13:56 173_Non-Phe 13_10_15_1356_34_631            | 1      | 2.679    | 1.035 | 0.205          | 0.074     | 1.012              | 0.075     | 3.648          | 1.563     | 0.558        | 0.226     | 0.867                                          | 0.318     |                    |           |
| 10/15/2013 13:57 173_Non-Phe 13_10_15_1357_35_441            | 1      | 2.679    | 0.988 | 0.205          | 0.073     | 0.954              | 0.077     | 3.648          | 1.555     | 0.558        | 0.215     | 0.867                                          | 0.322     |                    |           |
| 10/15/2013 13:58 173_Non-Phe 13_10_15_1358_36_181            | 1      | 2.679    | 1.047 | 0.205          | 0.072     | 0.896              | 0.076     | 3.648          | 1.551     | 0.558        | 0.207     | 0.867                                          | 0.325     |                    |           |
| 10/15/2013 13:59 173_Non-Phe 13_10_15_1359_36_931            | 1      | 2.679    | 1.104 | 0.205          | 0.073     | 0.854              | 0.076     | 3.648          | 1.564     | 0.558        | 0.216     | 0.867                                          | 0.334     |                    |           |
| 10/15/2013 14:00 173_Non-Phe 13_10_15_1400_37_771            | 1      | 2.679    | 0.968 | 0.205          | 0.070     | 0.972              | 0.077     | 3.648          | 1.552     | 0.558        | 0.204     | 0.867                                          | 0.303     |                    |           |
| 10/15/2013 14:01 173_Non-Phe 13_10_15_1401_38_521            | 1      | 2.679    | 1.157 | 0.205          | 0.070     | 0.933              | 0.078     | 3.648          | 1.563     | 0.558        | 0.211     | 0.867                                          | 0.341     |                    |           |
| 10/15/2013 14:02 173_Non-Phe 13_10_15_1402_39_241            | 1      | 2.679    | 1.028 | 0.205          | 0.075     | 1.006              | 0.076     | 3.648          | 1.575     | 0.558        | 0.216     | 0.867                                          | 0.328     |                    |           |
| 10/15/2013 14:03 173_Non-Phe 13_10_15_1403_40_061            | 1      | 2.679    | 1.097 | 0.205          | 0.069     | 0.980              | 0.078     | 3.648          | 1.560     | 0.5          |           |                                                |           |                    |           |

|                                                                  |  |  |  |                                                |  |  |  |
|------------------------------------------------------------------|--|--|--|------------------------------------------------|--|--|--|
| Company/ACT<br>Analyst Initials/STG<br>Parameters/EPA Method 320 |  |  |  | Client #/Amory<br>Job #/0913-173<br>sample #/4 |  |  |  |
|------------------------------------------------------------------|--|--|--|------------------------------------------------|--|--|--|

|                                                   |   |       |       |       |       |       |       |       |       |       |       |       |       |
|---------------------------------------------------|---|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| 10/15/2013 14:48 173_Non-Phe 13_10_15_1448_13_365 | 1 | 2.679 | 1.188 | 0.205 | 0.265 | 0.276 | 0.086 | 3.648 | 0.268 | 0.558 | 0.450 | 0.867 | 0.855 |
| Average Conc. (ppm):                              | 1 | 2.725 | 1.074 | 0.205 | 0.083 | 0.999 | 0.079 | 3.648 | 1.544 | 0.558 | 0.246 | 0.867 | 0.339 |

| Aspirator Run 1      |             |                      |    |                |           |                    |           |                |           |              |           |                       |           |                    |           |
|----------------------|-------------|----------------------|----|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|-----------|-----------------------|-----------|--------------------|-----------|
| Date                 | Method      | Filename             | DF | Acrolein (ppm) | SEC (ppm) | Formaldehyde (ppm) | SEC (ppm) | Methanol (ppm) | SEC (ppm) | Phenol (ppm) | SEC (ppm) | Propionaldehyde (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) |
| 10/15/2013 17:36     | 173_Non-Phe | 13_10_15_1736_20_230 | 1  | 2.679          | 1.465     | 0.832              | 0.177     | 3.012          | 0.143     | 3.648        | 2.019     | 0.558                 | 0.652     | 0.867              | 0.556     |
| 10/15/2013 17:37     | 173_Non-Phe | 13_10_15_1737_20_960 | 1  | 2.679          | 1.522     | 0.870              | 0.178     | 2.794          | 0.138     | 3.648        | 2.034     | 0.558                 | 0.655     | 0.867              | 0.574     |
| 10/15/2013 17:38     | 173_Non-Phe | 13_10_15_1738_21_720 | 1  | 2.679          | 1.461     | 0.814              | 0.179     | 2.783          | 0.140     | 3.648        | 2.037     | 0.558                 | 0.658     | 0.867              | 0.548     |
| 10/15/2013 17:39     | 173_Non-Phe | 13_10_15_1739_22_480 | 1  | 2.679          | 1.627     | 0.822              | 0.190     | 2.742          | 0.142     | 3.648        | 2.031     | 0.558                 | 0.691     | 0.867              | 0.599     |
| 10/15/2013 17:40     | 173_Non-Phe | 13_10_15_1740_23_240 | 1  | 2.679          | 1.535     | 0.797              | 0.184     | 2.665          | 0.139     | 3.648        | 2.027     | 0.558                 | 0.686     | 0.867              | 0.586     |
| 10/15/2013 17:41     | 173_Non-Phe | 13_10_15_1741_23_960 | 1  | 2.679          | 1.531     | 0.693              | 0.184     | 2.548          | 0.140     | 3.648        | 2.035     | 0.558                 | 0.681     | 0.867              | 0.579     |
| 10/15/2013 17:42     | 173_Non-Phe | 13_10_15_1742_24_741 | 1  | 2.679          | 1.409     | 0.845              | 0.186     | 2.682          | 0.141     | 3.648        | 2.025     | 0.558                 | 0.678     | 0.867              | 0.565     |
| 10/15/2013 17:43     | 173_Non-Phe | 13_10_15_1743_25_431 | 1  | 2.679          | 1.444     | 0.698              | 0.186     | 2.515          | 0.141     | 3.648        | 2.023     | 0.558                 | 0.680     | 0.867              | 0.587     |
| 10/15/2013 17:44     | 173_Non-Phe | 13_10_15_1744_26_271 | 1  | 2.679          | 1.453     | 0.731              | 0.183     | 2.557          | 0.138     | 3.648        | 2.026     | 0.558                 | 0.683     | 0.867              | 0.581     |
| 10/15/2013 17:45     | 173_Non-Phe | 13_10_15_1745_27_041 | 1  | 2.679          | 1.511     | 0.802              | 0.182     | 2.570          | 0.139     | 3.648        | 2.018     | 0.558                 | 0.685     | 0.867              | 0.569     |
| 10/15/2013 17:46     | 173_Non-Phe | 13_10_15_1746_27_711 | 1  | 2.679          | 1.515     | 0.834              | 0.184     | 2.492          | 0.141     | 3.648        | 2.038     | 0.558                 | 0.692     | 0.867              | 0.579     |
| 10/15/2013 17:47     | 173_Non-Phe | 13_10_15_1747_28_481 | 1  | 2.679          | 1.360     | 0.758              | 0.187     | 2.543          | 0.139     | 3.648        | 2.033     | 0.558                 | 0.694     | 0.867              | 0.584     |
| 10/15/2013 17:48     | 173_Non-Phe | 13_10_15_1748_29_241 | 1  | 2.679          | 1.434     | 0.859              | 0.184     | 2.549          | 0.139     | 3.648        | 2.028     | 0.558                 | 0.694     | 0.867              | 0.587     |
| 10/15/2013 17:49     | 173_Non-Phe | 13_10_15_1749_30_061 | 1  | 2.679          | 1.529     | 0.750              | 0.185     | 2.454          | 0.140     | 3.648        | 2.036     | 0.558                 | 0.695     | 0.867              | 0.591     |
| 10/15/2013 17:50     | 173_Non-Phe | 13_10_15_1750_30_771 | 1  | 2.679          | 1.495     | 0.766              | 0.189     | 2.365          | 0.137     | 3.648        | 2.034     | 0.558                 | 0.698     | 0.867              | 0.591     |
| 10/15/2013 17:51     | 173_Non-Phe | 13_10_15_1751_31_551 | 1  | 2.679          | 1.455     | 0.829              | 0.188     | 2.359          | 0.139     | 3.648        | 2.030     | 0.558                 | 0.708     | 0.867              | 0.589     |
| 10/15/2013 17:52     | 173_Non-Phe | 13_10_15_1752_32_281 | 1  | 2.679          | 1.523     | 0.920              | 0.191     | 2.432          | 0.142     | 3.648        | 2.027     | 0.558                 | 0.707     | 0.867              | 0.597     |
| 10/15/2013 17:53     | 173_Non-Phe | 13_10_15_1753_33_031 | 1  | 2.679          | 1.460     | 0.829              | 0.190     | 2.320          | 0.140     | 3.648        | 2.032     | 0.558                 | 0.707     | 0.867              | 0.580     |
| 10/15/2013 17:54     | 173_Non-Phe | 13_10_15_1754_33_752 | 1  | 2.679          | 1.440     | 0.778              | 0.191     | 2.342          | 0.138     | 3.648        | 2.032     | 0.558                 | 0.708     | 0.867              | 0.586     |
| 10/15/2013 17:55     | 173_Non-Phe | 13_10_15_1755_34_512 | 1  | 2.679          | 1.389     | 0.722              | 0.189     | 2.290          | 0.139     | 3.648        | 2.031     | 0.558                 | 0.709     | 0.867              | 0.583     |
| 10/15/2013 17:56     | 173_Non-Phe | 13_10_15_1756_35_272 | 1  | 2.679          | 1.438     | 0.831              | 0.189     | 2.326          | 0.140     | 3.648        | 2.037     | 0.558                 | 0.712     | 0.867              | 0.592     |
| 10/15/2013 17:57     | 173_Non-Phe | 13_10_15_1757_36_032 | 1  | 2.679          | 1.483     | 0.786              | 0.190     | 2.319          | 0.140     | 3.648        | 2.035     | 0.558                 | 0.706     | 0.867              | 0.568     |
| 10/15/2013 17:58     | 173_Non-Phe | 13_10_15_1758_36_842 | 1  | 2.679          | 1.517     | 0.829              | 0.193     | 2.286          | 0.140     | 3.648        | 2.029     | 0.558                 | 0.711     | 0.867              | 0.607     |
| 10/15/2013 17:59     | 173_Non-Phe | 13_10_15_1759_37_412 | 1  | 2.679          | 1.422     | 0.838              | 0.193     | 2.349          | 0.138     | 3.648        | 2.023     | 0.558                 | 0.712     | 0.867              | 0.576     |
| 10/15/2013 18:00     | 173_Non-Phe | 13_10_15_1800_38_222 | 1  | 2.679          | 1.518     | 0.852              | 0.194     | 2.320          | 0.140     | 3.648        | 2.026     | 0.558                 | 0.720     | 0.867              | 0.589     |
| 10/15/2013 18:01     | 173_Non-Phe | 13_10_15_1801_38_972 | 1  | 2.679          | 1.492     | 0.797              | 0.186     | 2.408          | 0.140     | 3.648        | 2.031     | 0.558                 | 0.723     | 0.867              | 0.593     |
| 10/15/2013 18:02     | 173_Non-Phe | 13_10_15_1802_39_732 | 1  | 2.679          | 1.501     | 0.892              | 0.191     | 2.390          | 0.143     | 3.648        | 2.023     | 0.558                 | 0.718     | 0.867              | 0.599     |
| 10/15/2013 18:03     | 173_Non-Phe | 13_10_15_1803_40_492 | 1  | 2.679          | 1.457     | 0.923              | 0.198     | 2.470          | 0.140     | 3.648        | 2.035     | 0.558                 | 0.729     | 0.867              | 0.595     |
| 10/15/2013 18:04     | 173_Non-Phe | 13_10_15_1804_41_282 | 1  | 2.679          | 1.427     | 0.860              | 0.192     | 2.416          | 0.142     | 3.648        | 2.035     | 0.558                 | 0.724     | 0.867              | 0.601     |
| 10/15/2013 18:05     | 173_Non-Phe | 13_10_15_1805_42_053 | 1  | 2.679          | 1.457     | 0.845              | 0.195     | 2.389          | 0.141     | 3.648        | 2.033     | 0.558                 | 0.721     | 0.867              | 0.605     |
| 10/15/2013 18:06     | 173_Non-Phe | 13_10_15_1806_42_763 | 1  | 2.679          | 1.455     | 0.872              | 0.191     | 2.433          | 0.141     | 3.648        | 2.045     | 0.558                 | 0.714     | 0.867              | 0.594     |
| 10/15/2013 18:07     | 173_Non-Phe | 13_10_15_1807_43_543 | 1  | 2.679          | 1.533     | 0.899              | 0.188     | 2.438          | 0.138     | 3.648        | 2.029     | 0.558                 | 0.685     | 0.867              | 0.594     |
| 10/15/2013 18:08     | 173_Non-Phe | 13_10_15_1808_44_293 | 1  | 2.679          | 1.473     | 0.930              | 0.175     | 2.542          | 0.138     | 3.648        | 2.041     | 0.558                 | 0.639     | 0.867              | 0.567     |
| 10/15/2013 18:09     | 173_Non-Phe | 13_10_15_1809_45_103 | 1  | 2.679          | 1.530     | 0.827              | 0.162     | 2.716          | 0.133     | 3.648        | 2.040     | 0.558                 | 0.591     | 0.867              | 0.570     |
| 10/15/2013 18:10     | 173_Non-Phe | 13_10_15_1810_45_773 | 1  | 2.679          | 1.467     | 0.843              | 0.152     | 2.683          | 0.132     | 3.648        | 2.032     | 0.558                 | 0.535     | 0.867              | 0.532     |
| 10/15/2013 18:11     | 173_Non-Phe | 13_10_15_1811_46_533 | 1  | 2.679          | 1.465     | 0.896              | 0.149     | 2.861          | 0.131     | 3.648        | 2.029     | 0.558                 | 0.506     | 0.867              | 0.527     |
| 10/15/2013 18:12     | 173_Non-Phe | 13_10_15_1812_47_343 | 1  | 2.679          | 1.460     | 0.869              | 0.148     | 2.908          | 0.131     | 3.648        | 2.045     | 0.558                 | 0.519     | 0.867              | 0.516     |
| 10/15/2013 18:13     | 173_Non-Phe | 13_10_15_1813_48_113 | 1  | 2.679          | 1.479     | 0.920              | 0.150     | 2.858          | 0.131     | 3.648        | 2.033     | 0.558                 | 0.533     | 0.867              | 0.529     |
| 10/15/2013 18:14     | 173_Non-Phe | 13_10_15_1814_48_813 | 1  | 2.679          | 1.426     | 0.797              | 0.159     | 2.908          | 0.130     | 3.648        | 2.046     | 0.558                 | 0.560     | 0.867              | 0.523     |
| 10/15/2013 18:15     | 173_Non-Phe | 13_10_15_1815_49_633 | 1  | 2.679          | 1.545     | 0.710              | 0.161     | 2.848          | 0.132     | 3.648        | 2.040     | 0.558                 | 0.587     | 0.867              | 0.560     |
| 10/15/2013 18:16     | 173_Non-Phe | 13_10_15_1816_50_353 | 1  | 2.679          | 1.475     | 0.840              | 0.168     | 2.960          | 0.134     | 3.648        | 2.043     | 0.558                 | 0.606     | 0.867              | 0.557     |
| 10/15/2013 18:17     | 173_Non-Phe | 13_10_15_1817_51_074 | 1  | 2.679          | 1.549     | 0.887              | 0.169     | 2.959          | 0.137     | 3.648        | 2.032     | 0.558                 | 0.617     | 0.867              | 0.568     |
| 10/15/2013 18:18     | 173_Non-Phe | 13_10_15_1818_51_864 | 1  | 2.679          | 1.523     | 0.832              | 0.174     | 3.033          | 0.140     | 3.648        | 2.023     | 0.558                 | 0.636     | 0.867              | 0.568     |
| 10/15/2013 18:19     | 173_Non-Phe | 13_10_15_1819_52_674 | 1  | 2.679          | 1.455     | 0.824              | 0.176     | 3.011          | 0.138     | 3.648        | 2.023     | 0.558                 | 0.635     | 0.867              | 0.574     |
| 10/15/2013 18:20     | 173_Non-Phe | 13_10_15_1820_53_414 | 1  | 2.679          | 1.525     | 0.867              | 0.180     | 2.935          | 0.139     | 3.648        | 2.035     | 0.558                 | 0.650     | 0.867              | 0.571     |
| 10/15/2013 18:21     | 173_Non-Phe | 13_10_15_1821_54_174 | 1  | 2.679          | 1.485     | 1.038              | 0.174     | 2.890          | 0.143     | 3.648        | 2.035     | 0.558                 | 0.648     | 0.867              | 0.547     |
| 10/15/2013 18:22     | 173_Non-Phe | 13_10_15_1822_54_894 | 1  | 2.679          | 1.541     | 0.921              | 0.175     | 2.867          | 0.141     | 3.648        | 2.040     | 0.558                 | 0.665     | 0.867              | 0.575     |
| 10/15/2013 18:23     | 173_Non-Phe | 13_10_15_1823_55_724 | 1  | 2.679          | 1.499     | 0.907              | 0.182     | 2.712          | 0.140     | 3.648        | 2.032     | 0.558                 | 0.672     | 0.867              | 0.578     |
| 10/15/2013 18:24     | 173_Non-Phe | 13_10_15_1824_56_494 | 1  | 2.679          | 1.450     | 1.055              | 0.179     | 2.739          | 0.141     | 3.648        | 2.035     | 0.558                 | 0.678     | 0.867              | 0.582     |
| 10/15/2013 18:25     | 173_Non-Phe | 13_10_15_1825_57_204 | 1  | 2.679          | 1.458     | 0.929              | 0.186     | 2.591          | 0.142     | 3.648        | 2.027     | 0.558                 | 0.688     | 0.867              | 0.587     |
| 10/15/2013 18:26     | 173_Non-Phe | 13_10_15_1826_57_954 | 1  | 2.679          | 1.382     | 0.853              | 0.189     | 2.655          | 0.141     | 3.648        | 2.018     | 0.558                 | 0.693     | 0.867              | 0.569     |
| 10/15/2013 18:27     | 173_Non-Phe | 13_10_15_1827_58_704 | 1  | 2.679          | 1.404     | 0.916              | 0.188     | 2.634          | 0.144     | 3.648        | 2.021     | 0.558                 | 0.703     | 0.867              | 0.596     |
| 10/15/2013 18:28     | 173_Non-Phe | 13_10_15_1828_59_474 | 1  | 2.679          | 1.495     | 0.864              | 0.189     | 2.664          | 0.141     | 3.648        | 2.017     | 0.558                 | 0.710     | 0.867              | 0.591     |
| 10/15/2013 18:30     | 173_Non-Phe | 13_10_15_1830_01_265 | 1  | 2.679          | 1.523     | 0.869              | 0.191     | 2.621          | 0.144     | 3.648        | 2.023     | 0.558                 | 0.715     | 0.867              | 0.614     |
| 10/15/2013 18:31     | 173_Non-Phe | 13_10_15_1831_02_065 | 1  | 2.679          | 1.462     | 0.855              | 0.191     | 2.669          | 0.142     | 3.648        | 2.025     | 0.558                 | 0.718     | 0.867              | 0.593     |
| 10/15/2013 18:32     | 173_Non-Phe | 13_10_15_1832_02_795 | 1  | 2.679          | 1.461     | 0.834              | 0.191     | 2.588          | 0.143     | 3.648        | 2.025     | 0.558                 | 0.719     | 0.867              | 0.594     |
| 10/15/2013 18:33     | 173_Non-Phe | 13_10_15_1833_03_555 | 1  | 2.679          | 1.538     | 0.802              | 0.189     | 2.604          | 0.145     | 3.648        | 2.024     | 0.558                 | 0.718     | 0.867              | 0.625     |
| 10/15/2013 18:34     | 173_Non-Phe | 13_10_15_1834_04_365 | 1  | 2.679          | 1.456     | 0.887              | 0.195     | 2.656          | 0.145     | 3.648        | 2.021     | 0.558                 | 0.720     | 0.867              | 0.599     |
| 10/15/2013 18:35     | 173_Non-Phe | 13_10_15_1835_05_115 | 1  | 2.679          | 1.404     | 0.856              | 0.196     | 2.665          | 0.146     | 3.648        | 2.040     | 0.558                 | 0.726     | 0.867              | 0.606     |
| 10/15/2013 18:36     | 173_Non-Phe | 13_10_15_1836_05_865 | 1  | 2.679          | 1.349     | 0.468              | 0.197     | 2.318          | 0.133     | 3.648        | 1.905     | 0.558                 | 0.691     | 0.867              | 0.585     |
| Average Conc. (ppm): |             |                      |    | 2.679          | 1.476     | 0.838              | 0.182     | 2.611          | 0.139     | 3.648        | 2.029     | 0.558                 | 0.674     | 0.867              | 0.579     |

| Aspirator Run |
|---------------|
|---------------|

| Company<br>Analyst Initials<br>Parameters        |   |       |       |       |       | Client # Amory<br>Job # 0913-173<br>sample # 4 |       |       |       |       |       |       |       |
|--------------------------------------------------|---|-------|-------|-------|-------|------------------------------------------------|-------|-------|-------|-------|-------|-------|-------|
| EPA Method 320                                   |   |       |       |       |       |                                                |       |       |       |       |       |       |       |
| 0/15/2013 19:30 173_Non-Phe 13_10_15_1930_46_270 | 1 | 2.679 | 1.412 | 0.720 | 0.206 | 3.002                                          | 0.157 | 3.648 | 1.998 | 0.558 | 0.762 | 0.867 | 0.580 |
| 0/15/2013 19:31 173_Non-Phe 13_10_15_1931_47_030 | 1 | 2.679 | 1.500 | 0.729 | 0.207 | 3.079                                          | 0.160 | 3.648 | 2.002 | 0.558 | 0.767 | 0.867 | 0.604 |
| 0/15/2013 19:32 173_Non-Phe 13_10_15_1932_47_740 | 1 | 2.679 | 1.463 | 0.706 | 0.212 | 3.157                                          | 0.163 | 3.648 | 1.996 | 0.558 | 0.777 | 0.867 | 0.559 |
| 0/15/2013 19:33 173_Non-Phe 13_10_15_1933_48_540 | 1 | 2.679 | 1.506 | 0.657 | 0.206 | 3.198                                          | 0.166 | 3.648 | 2.005 | 0.558 | 0.776 | 0.867 | 0.582 |
| 0/15/2013 19:34 173_Non-Phe 13_10_15_1934_49_250 | 1 | 2.679 | 1.432 | 0.758 | 0.206 | 3.236                                          | 0.166 | 3.648 | 2.006 | 0.558 | 0.764 | 0.867 | 0.581 |
| 0/15/2013 19:35 173_Non-Phe 13_10_15_1935_50_070 | 1 | 2.679 | 1.500 | 0.601 | 0.202 | 3.120                                          | 0.164 | 3.648 | 2.007 | 0.558 | 0.757 | 0.867 | 0.579 |
| 0/15/2013 19:36 173_Non-Phe 13_10_15_1936_50_850 | 1 | 2.679 | 1.441 | 0.768 | 0.196 | 3.087                                          | 0.156 | 3.648 | 2.003 | 0.558 | 0.734 | 0.867 | 0.565 |
| 0/15/2013 19:37 173_Non-Phe 13_10_15_1937_51_560 | 1 | 2.679 | 1.397 | 0.651 | 0.190 | 3.082                                          | 0.160 | 3.648 | 2.002 | 0.558 | 0.716 | 0.867 | 0.556 |
| 0/15/2013 19:38 173_Non-Phe 13_10_15_1938_52_350 | 1 | 2.679 | 1.447 | 0.726 | 0.188 | 2.990                                          | 0.151 | 3.648 | 2.001 | 0.558 | 0.711 | 0.867 | 0.559 |
| 0/15/2013 19:39 173_Non-Phe 13_10_15_1939_53_120 | 1 | 2.679 | 1.531 | 0.706 | 0.185 | 2.924                                          | 0.150 | 3.648 | 2.011 | 0.558 | 0.694 | 0.867 | 0.562 |
| 0/15/2013 19:40 173_Non-Phe 13_10_15_1940_53_831 | 1 | 2.679 | 1.385 | 0.765 | 0.186 | 2.924                                          | 0.148 | 3.648 | 2.001 | 0.558 | 0.687 | 0.867 | 0.533 |
| 0/15/2013 19:41 173_Non-Phe 13_10_15_1941_54_551 | 1 | 2.679 | 1.471 | 0.649 | 0.180 | 2.910                                          | 0.147 | 3.648 | 2.008 | 0.558 | 0.679 | 0.867 | 0.545 |
| 0/15/2013 19:42 173_Non-Phe 13_10_15_1942_55_311 | 1 | 2.679 | 1.564 | 0.762 | 0.180 | 2.857                                          | 0.147 | 3.648 | 1.996 | 0.558 | 0.671 | 0.867 | 0.569 |
| 0/15/2013 19:43 173_Non-Phe 13_10_15_1943_56_131 | 1 | 2.679 | 1.500 | 0.719 | 0.179 | 2.878                                          | 0.150 | 3.648 | 2.012 | 0.558 | 0.674 | 0.867 | 0.554 |
| 0/15/2013 19:44 173_Non-Phe 13_10_15_1944_56_911 | 1 | 2.679 | 1.487 | 0.773 | 0.184 | 2.865                                          | 0.147 | 3.648 | 1.994 | 0.558 | 0.678 | 0.867 | 0.529 |
| 0/15/2013 19:45 173_Non-Phe 13_10_15_1945_57_631 | 1 | 2.679 | 1.454 | 0.885 | 0.187 | 2.802                                          | 0.146 | 3.648 | 2.007 | 0.558 | 0.662 | 0.867 | 0.549 |
| 0/15/2013 19:46 173_Non-Phe 13_10_15_1946_58_371 | 1 | 2.679 | 1.486 | 0.784 | 0.181 | 2.687                                          | 0.144 | 3.648 | 1.999 | 0.558 | 0.658 | 0.867 | 0.546 |
| 0/15/2013 19:47 173_Non-Phe 13_10_15_1947_59_161 | 1 | 2.679 | 1.494 | 0.812 | 0.175 | 2.721                                          | 0.142 | 3.648 | 1.999 | 0.558 | 0.652 | 0.867 | 0.538 |
| 0/15/2013 19:48 173_Non-Phe 13_10_15_1948_59_901 | 1 | 2.679 | 1.135 | 0.205 | 0.235 | 0.773                                          | 0.082 | 3.648 | 1.044 | 0.558 | 0.499 | 0.867 | 0.729 |
| Average Conc. (ppm):                             | 1 | 2.679 | 1.465 | 0.821 | 0.201 | 2.861                                          | 0.152 | 3.648 | 1.986 | 0.558 | 0.752 | 0.867 | 0.590 |

# Aspirator Run 3

| Date                 | Method      | Filename             | DF | Acrolein (ppm) | SEC (ppm) | Formaldehyde (ppm) | SEC (ppm) | Methanol (ppm) | SEC (ppm) | Phenol (ppm) | SEC (ppm) | Propionaldehyde (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) |       |
|----------------------|-------------|----------------------|----|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|-----------|-----------------------|-----------|--------------------|-----------|-------|
| 10/15/2013 20:00     | 173_Non-Phe | 13_10_15_2000_08_262 | 1  | 2.679          | 1.463     | 0.963              | 0.166     | 2.666          | 0.138     | 3.648        | 2.013     | 0.558                 | 0.617     | 0.867              | 0.538     |       |
| 10/15/2013 20:01     | 173_Non-Phe | 13_10_15_2001_09_022 | 1  | 2.679          | 1.456     | 0.887              | 0.166     | 2.713          | 0.138     | 3.648        | 2.019     | 0.558                 | 0.609     | 0.867              | 0.533     |       |
| 10/15/2013 20:02     | 173_Non-Phe | 13_10_15_2002_09_792 | 1  | 2.679          | 1.468     | 0.814              | 0.165     | 2.740          | 0.139     | 3.648        | 2.006     | 0.558                 | 0.605     | 0.867              | 0.523     |       |
| 10/15/2013 20:03     | 173_Non-Phe | 13_10_15_2003_10_502 | 1  | 2.679          | 1.413     | 0.784              | 0.166     | 2.812          | 0.135     | 3.648        | 2.009     | 0.558                 | 0.602     | 0.867              | 0.524     |       |
| 10/15/2013 20:04     | 173_Non-Phe | 13_10_15_2004_11_152 | 1  | 2.679          | 1.425     | 0.767              | 0.161     | 2.845          | 0.136     | 3.648        | 2.009     | 0.558                 | 0.590     | 0.867              | 0.518     |       |
| 10/15/2013 20:05     | 173_Non-Phe | 13_10_15_2005_11_943 | 1  | 2.679          | 1.355     | 0.933              | 0.162     | 2.867          | 0.136     | 3.648        | 2.019     | 0.558                 | 0.580     | 0.867              | 0.505     |       |
| 10/15/2013 20:06     | 173_Non-Phe | 13_10_15_2006_12_743 | 1  | 2.679          | 1.494     | 0.861              | 0.163     | 2.830          | 0.135     | 3.648        | 2.012     | 0.558                 | 0.591     | 0.867              | 0.545     |       |
| 10/15/2013 20:07     | 173_Non-Phe | 13_10_15_2007_13_463 | 1  | 2.679          | 1.401     | 0.926              | 0.166     | 2.768          | 0.135     | 3.648        | 2.018     | 0.558                 | 0.599     | 0.867              | 0.528     |       |
| 10/15/2013 20:08     | 173_Non-Phe | 13_10_15_2008_14_173 | 1  | 2.679          | 1.512     | 0.796              | 0.164     | 2.671          | 0.137     | 3.648        | 2.004     | 0.558                 | 0.613     | 0.867              | 0.540     |       |
| 10/15/2013 20:09     | 173_Non-Phe | 13_10_15_2009_14_993 | 1  | 2.679          | 1.387     | 0.870              | 0.170     | 2.751          | 0.136     | 3.648        | 2.011     | 0.558                 | 0.619     | 0.867              | 0.515     |       |
| 10/15/2013 20:10     | 173_Non-Phe | 13_10_15_2010_15_743 | 1  | 2.679          | 1.408     | 0.870              | 0.170     | 2.637          | 0.138     | 3.648        | 2.018     | 0.558                 | 0.616     | 0.867              | 0.527     |       |
| 10/15/2013 20:11     | 173_Non-Phe | 13_10_15_2011_16_563 | 1  | 2.679          | 1.448     | 0.991              | 0.169     | 2.640          | 0.134     | 3.648        | 2.007     | 0.558                 | 0.610     | 0.867              | 0.536     |       |
| 10/15/2013 20:12     | 173_Non-Phe | 13_10_15_2012_17_303 | 1  | 2.679          | 1.464     | 0.913              | 0.168     | 2.638          | 0.134     | 3.648        | 2.027     | 0.558                 | 0.601     | 0.867              | 0.524     |       |
| 10/15/2013 20:13     | 173_Non-Phe | 13_10_15_2013_18_053 | 1  | 2.679          | 1.444     | 0.858              | 0.162     | 2.565          | 0.135     | 3.648        | 2.007     | 0.558                 | 0.589     | 0.867              | 0.540     |       |
| 10/15/2013 20:14     | 173_Non-Phe | 13_10_15_2014_18_853 | 1  | 2.679          | 1.479     | 0.763              | 0.156     | 2.673          | 0.134     | 3.648        | 2.019     | 0.558                 | 0.572     | 0.867              | 0.539     |       |
| 10/15/2013 20:15     | 173_Non-Phe | 13_10_15_2015_19_553 | 1  | 2.679          | 1.444     | 0.837              | 0.156     | 2.655          | 0.133     | 3.648        | 2.024     | 0.558                 | 0.567     | 0.867              | 0.517     |       |
| 10/15/2013 20:16     | 173_Non-Phe | 13_10_15_2016_20_383 | 1  | 2.679          | 1.447     | 0.930              | 0.160     | 2.597          | 0.135     | 3.648        | 2.019     | 0.558                 | 0.564     | 0.867              | 0.519     |       |
| 10/15/2013 20:17     | 173_Non-Phe | 13_10_15_2017_21_104 | 1  | 2.679          | 1.454     | 0.863              | 0.159     | 2.604          | 0.132     | 3.648        | 2.024     | 0.558                 | 0.571     | 0.867              | 0.539     |       |
| 10/15/2013 20:18     | 173_Non-Phe | 13_10_15_2018_21_884 | 1  | 2.679          | 1.457     | 0.793              | 0.159     | 2.574          | 0.132     | 3.648        | 2.013     | 0.558                 | 0.588     | 0.867              | 0.527     |       |
| 10/15/2013 20:19     | 173_Non-Phe | 13_10_15_2019_22_634 | 1  | 2.679          | 1.481     | 0.881              | 0.166     | 2.543          | 0.131     | 3.648        | 2.003     | 0.558                 | 0.606     | 0.867              | 0.533     |       |
| 10/15/2013 20:20     | 173_Non-Phe | 13_10_15_2020_23_404 | 1  | 2.679          | 1.448     | 0.989              | 0.168     | 2.580          | 0.132     | 3.648        | 2.021     | 0.558                 | 0.616     | 0.867              | 0.539     |       |
| 10/15/2013 20:21     | 173_Non-Phe | 13_10_15_2021_24_064 | 1  | 2.679          | 1.370     | 0.835              | 0.172     | 2.461          | 0.132     | 3.648        | 2.039     | 0.558                 | 0.616     | 0.867              | 0.524     |       |
| 10/15/2013 20:22     | 173_Non-Phe | 13_10_15_2022_24_884 | 1  | 2.679          | 1.455     | 0.879              | 0.169     | 2.490          | 0.131     | 3.648        | 2.028     | 0.558                 | 0.609     | 0.867              | 0.535     |       |
| 10/15/2013 20:23     | 173_Non-Phe | 13_10_15_2023_25_664 | 1  | 2.679          | 1.487     | 0.928              | 0.166     | 2.466          | 0.133     | 3.648        | 2.014     | 0.558                 | 0.611     | 0.867              | 0.529     |       |
| 10/15/2013 20:24     | 173_Non-Phe | 13_10_15_2024_26_364 | 1  | 2.679          | 1.472     | 0.940              | 0.168     | 2.471          | 0.133     | 3.648        | 2.022     | 0.558                 | 0.609     | 0.867              | 0.539     |       |
| 10/15/2013 20:25     | 173_Non-Phe | 13_10_15_2025_27_134 | 1  | 2.679          | 1.507     | 0.840              | 0.166     | 2.437          | 0.130     | 3.648        | 2.027     | 0.558                 | 0.608     | 0.867              | 0.542     |       |
| 10/15/2013 20:26     | 173_Non-Phe | 13_10_15_2026_27_894 | 1  | 2.679          | 1.540     | 0.878              | 0.163     | 2.352          | 0.130     | 3.648        | 2.020     | 0.558                 | 0.597     | 0.867              | 0.554     |       |
| 10/15/2013 20:27     | 173_Non-Phe | 13_10_15_2027_28_654 | 1  | 2.679          | 1.468     | 0.890              | 0.159     | 2.390          | 0.134     | 3.648        | 2.035     | 0.558                 | 0.584     | 0.867              | 0.521     |       |
| 10/15/2013 20:28     | 173_Non-Phe | 13_10_15_2028_29_365 | 1  | 2.679          | 1.429     | 0.928              | 0.155     | 2.441          | 0.132     | 3.648        | 2.014     | 0.558                 | 0.577     | 0.867              | 0.496     |       |
| 10/15/2013 20:29     | 173_Non-Phe | 13_10_15_2029_30_125 | 1  | 2.679          | 1.405     | 0.728              | 0.161     | 2.425          | 0.131     | 3.648        | 2.017     | 0.558                 | 0.571     | 0.867              | 0.508     |       |
| 10/15/2013 20:30     | 173_Non-Phe | 13_10_15_2030_30_925 | 1  | 2.679          | 1.438     | 0.845              | 0.157     | 2.443          | 0.127     | 3.648        | 2.027     | 0.558                 | 0.563     | 0.867              | 0.523     |       |
| 10/15/2013 20:31     | 173_Non-Phe | 13_10_15_2031_31_715 | 1  | 2.679          | 1.472     | 0.880              | 0.155     | 2.443          | 0.130     | 3.648        | 2.027     | 0.558                 | 0.549     | 0.867              | 0.525     |       |
| 10/15/2013 20:32     | 173_Non-Phe | 13_10_15_2032_32_475 | 1  | 2.679          | 1.449     | 0.763              | 0.148     | 2.591          | 0.130     | 3.648        | 2.035     | 0.558                 | 0.542     | 0.867              | 0.522     |       |
| 10/15/2013 20:33     | 173_Non-Phe | 13_10_15_2033_33_185 | 1  | 2.679          | 1.506     | 0.727              | 0.156     | 2.570          | 0.127     | 3.648        | 2.035     | 0.558                 | 0.545     | 0.867              | 0.532     |       |
| 10/15/2013 20:34     | 173_Non-Phe | 13_10_15_2034_33_905 | 1  | 2.679          | 1.451     | 0.683              | 0.151     | 2.511          | 0.128     | 3.648        | 2.012     | 0.558                 | 0.536     | 0.867              | 0.525     |       |
| 10/15/2013 20:35     | 173_Non-Phe | 13_10_15_2035_34_705 | 1  | 2.679          | 1.496     | 0.745              | 0.154     | 2.516          | 0.129     | 3.648        | 2.029     | 0.558                 | 0.535     | 0.867              | 0.526     |       |
| 10/15/2013 20:36     | 173_Non-Phe | 13_10_15_2036_35_445 | 1  | 2.679          | 1.379     | 0.733              | 0.152     | 2.618          | 0.126     | 3.648        | 2.023     | 0.558                 | 0.529     | 0.867              | 0.515     |       |
| 10/15/2013 20:37     | 173_Non-Phe | 13_10_15_2037_36_255 | 1  | 2.679          | 1.429     | 0.709              | 0.151     | 2.560          | 0.127     | 3.648        | 2.017     | 0.558                 | 0.538     | 0.867              | 0.503     |       |
| 10/15/2013 20:38     | 173_Non-Phe | 13_10_15_2038_37_015 | 1  | 2.679          | 1.444     | 0.769              | 0.148     | 2.585          | 0.128     | 3.648        | 2.017     | 0.558                 | 0.534     | 0.867              | 0.508     |       |
| 10/15/2013 20:39     | 173_Non-Phe | 13_10_15_2039_37_755 | 1  | 2.679          | 1.510     | 0.788              | 0.146     | 2.614          | 0.127     | 3.648        | 2.020     | 0.558                 | 0.535     | 0.867              | 0.516     |       |
| 10/15/2013 20:40     | 173_Non-Phe | 13_10_15_2040_38_526 | 1  | 2.679          | 1.480     | 0.811              | 0.148     | 2.661          | 0.127     | 3.648        | 2.015     | 0.558                 | 0.523     | 0.867              | 0.510     |       |
| 10/15/2013 20:41     | 173_Non-Phe | 13_10_15_2041_39_246 | 1  | 2.679          | 1.550     | 0.821              | 0.147     | 2.817          | 0.125     | 3.648        | 2.022     | 0.558                 | 0.518     | 0.867              | 0.533     |       |
| 10/15/2013 20:42     | 173_Non-Phe | 13_10_15_2042_39_956 | 1  | 2.679          | 1.482     | 0.861              | 0.147     | 2.866          | 0.128     | 3.648        | 2.025     | 0.558                 | 0.517     | 0.867              | 0.526     |       |
| 10/15/2013 20:43     | 173_Non-Phe | 13_10_15_2043_40_746 | 1  | 2.679          | 1.450     | 0.767              | 0.144     | 3.009          | 0.127     | 3.648        | 2.027     | 0.558                 | 0.510     | 0.867              | 0.511     |       |
| 10/15/2013 20:44     | 173_Non-Phe | 13_10_15_2044_41_566 | 1  | 2.679          | 1.367     | 0.697              | 0.147     | 3.030          | 0.127     | 3.648        | 2.025     | 0.558                 | 0.511     | 0.867              | 0.479     |       |
| 10/15/2013 20:45     | 173_Non-Phe | 13_10_15_2045_42_186 | 1  | 2.679          | 1.451     | 0.668              | 0.145     | 3.099          | 0.129     | 3.648        | 2.025     | 0.558                 | 0.512     | 0.867              | 0.489     |       |
| 10/15/2013 20:46     | 173_Non-Phe | 13_10_15_2046_42_986 | 1  | 2.679          | 1.461     | 0.763              | 0.147     | 3.168          | 0.129     | 3.648        | 2.009     | 0.558                 | 0.511     | 0.867              | 0.491     |       |
| 10/15/2013 20:47     | 173_Non-Phe | 13_10_15_2047_43_726 | 1  | 2.679          | 1.420     | 0.708              | 0.141     | 3.080          | 0.129     | 3.648        | 2.021     | 0.558                 | 0.499     | 0.867              | 0.479     |       |
| 10/15/2013 20:48     | 173_Non-Phe | 13_10_15_2048_44_446 | 1  | 2.679          | 1.497     | 0.741              | 0.143     | 3.074          | 0.127     | 3.648        | 2.022     | 0.558                 | 0.508     | 0.867              | 0.500     |       |
| 10/15/2013 20:49     | 173_Non-Phe | 13_10_15_2049_45_236 | 1  | 2.679          | 1.406     | 0.703              | 0.147     | 3.044          | 0.129     | 3.648        | 2.022     | 0.558                 | 0.505     | 0.867              | 0.489     |       |
| 10/15/2013 20:50     | 173_Non-Phe | 13_10_15_2050_45_976 | 1  | 2.679          | 1.510     | 0.759              | 0.143     | 3.098          | 0.129     | 3.648        | 2.028     | 0.558                 | 0.505     | 0.867              | 0.512     |       |
| 10/15/2013 20:51     | 173_Non-Phe | 13_10_15_2051_46_746 | 1  | 2.679          | 1.387     | 0.697              | 0.143     | 3.143          | 0.124     | 3.648        | 2.021     | 0.558                 | 0.495     | 0.867              | 0.475     |       |
| 10/15/2013 20:52     | 173_Non-Phe | 13_10_15_2052_47_447 | 1  | 2.679          | 1.435     | 0.793              | 0.143     | 3.149          | 0.127     | 3.648        | 2.018     | 0.558                 | 0.498     | 0.867              | 0.485     |       |
| 10/15/2013 20:53     | 173_Non-Phe | 13_10_15_2053_48_167 | 1  | 2.679          | 1.416     | 0.697              | 0.145     | 3.218          | 0.126     | 3.648        | 2.019     | 0.558                 | 0.492     | 0.867              | 0.502     |       |
| 10/15/2013 20:54     | 173_Non-Phe | 13_10_15_2054_48_927 | 1  | 2.679          | 1.476     | 0.814              | 0.144     | 3.237          | 0.128     | 3.648        | 2.024     | 0.558                 | 0.485     | 0.867              | 0.494     |       |
| 10/15/2013 20:55     | 173_Non-Phe | 13_10_15_2055_49_707 | 1  | 2.679          | 1.451     | 0.763              | 0.143     | 3.263          | 0.125     | 3.648        | 2.016     | 0.558                 | 0.486     | 0.867              | 0.491     |       |
| 10/15/2013 20:56     | 173_Non-Phe | 13_10_15_2056_50_477 | 1  | 2.679          | 1.500     | 0.704              | 0.134     | 3.279          | 0.125     | 3.648        | 2.016     | 0.558                 | 0.486     | 0.867              | 0.496     |       |
| 10/15/2013 20:57     | 173_Non-Phe | 13_10_15_2057_51_217 | 1  | 2.679          | 1.398     | 0.715              | 0.137     | 3.241          | 0.126     | 3.648        | 2.030     | 0.558                 | 0.470     | 0.867              | 0.459     |       |
| 10/15/2013 20:58     | 173_Non-Phe | 13_10_15_2058_52_507 | 1  | 2.679          | 1.535     | 0.821              | 0.137     | 3.223          | 0.124     | 3.648        | 2.023     | 0.558                 | 0.461     | 0.867              | 0.499     |       |
| 10/15/2013 20:59     | 173_Non-Phe | 13_10_15_2059_52_747 | 1  | 2.679          | 1.178     | 0.205              | 0.178     | 0.087          | 3.648     | 1.438        | 0.558     | 0.442                 | 0.867     | 0.585              |           |       |
| 10/15/2013 21:00     | 173_Non-Phe | 13_10_15_2100_53_507 | 1  | 2.679          | 1.310     | 0.205              | 0.271     | 0.086          | 3.648     | 0.303        | 0.558     | 0.479                 | 0.867     | 0.942              |           |       |
| Average Conc. (ppm): |             |                      |    | 1              | 2.679     | 1.446              | 0.794     | 0.158          | 2.696     | 0.129        | 3.648     | 1.982                 | 0.558     | 0.552              | 0.867     | 0.525 |

| Company          | ACT            |
|------------------|----------------|
| Analyst Initials | STG            |
| Parameters       | EPA Method 320 |

| Client # | Amory    |
|----------|----------|
| Job #    | 0913-173 |
| sample # | 4        |

|                  |             |                      |   |       |       |       |       |       |       |       |       |       |       |       |       |
|------------------|-------------|----------------------|---|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| 10/16/2013 11:16 | 173_Non-Phe | 13_10_16_1116_18_342 | 1 | 2.679 | 1.039 | 0.205 | 0.067 | 0.685 | 0.073 | 3.648 | 1.568 | 0.558 | 0.165 | 0.867 | 0.315 |
| 10/16/2013 11:17 | 173_Non-Phe | 13_10_16_1117_19_052 | 1 | 2.679 | 1.096 | 0.205 | 0.065 | 0.586 | 0.071 | 3.648 | 1.571 | 0.558 | 0.159 | 0.867 | 0.330 |
| 10/16/2013 11:18 | 173_Non-Phe | 13_10_16_1118_19_792 | 1 | 2.679 | 1.006 | 0.205 | 0.070 | 0.661 | 0.072 | 3.648 | 1.563 | 0.558 | 0.160 | 0.867 | 0.321 |
| 10/16/2013 11:19 | 173_Non-Phe | 13_10_16_1119_20_502 | 1 | 2.679 | 1.188 | 0.205 | 0.072 | 0.666 | 0.072 | 3.648 | 1.572 | 0.558 | 0.179 | 0.867 | 0.351 |
| 10/16/2013 11:20 | 173_Non-Phe | 13_10_16_1120_21_332 | 1 | 2.679 | 1.059 | 0.205 | 0.066 | 0.673 | 0.075 | 3.648 | 1.565 | 0.558 | 0.172 | 0.867 | 0.309 |
| 10/16/2013 11:21 | 173_Non-Phe | 13_10_16_1121_22_052 | 1 | 2.679 | 1.126 | 0.205 | 0.071 | 0.612 | 0.074 | 3.648 | 1.575 | 0.558 | 0.180 | 0.867 | 0.346 |
| 10/16/2013 11:22 | 173_Non-Phe | 13_10_16_1122_22_852 | 1 | 2.679 | 1.072 | 0.205 | 0.070 | 0.677 | 0.074 | 3.648 | 1.591 | 0.558 | 0.180 | 0.867 | 0.317 |
| 10/16/2013 11:23 | 173_Non-Phe | 13_10_16_1123_23_562 | 1 | 2.679 | 1.098 | 0.205 | 0.069 | 0.753 | 0.074 | 3.648 | 1.581 | 0.558 | 0.178 | 0.867 | 0.330 |
| 10/16/2013 11:24 | 173_Non-Phe | 13_10_16_1124_24_403 | 1 | 2.679 | 1.065 | 0.205 | 0.068 | 0.695 | 0.072 | 3.648 | 1.590 | 0.558 | 0.156 | 0.867 | 0.331 |
| 10/16/2013 11:25 | 173_Non-Phe | 13_10_16_1125_25_123 | 1 | 2.679 | 1.042 | 0.205 | 0.065 | 0.618 | 0.071 | 3.648 | 1.589 | 0.558 | 0.162 | 0.867 | 0.313 |
| 10/16/2013 11:26 | 173_Non-Phe | 13_10_16_1126_25_883 | 1 | 2.679 | 1.102 | 0.205 | 0.072 | 0.637 | 0.068 | 3.648 | 1.581 | 0.558 | 0.188 | 0.867 | 0.336 |
| 10/16/2013 11:27 | 173_Non-Phe | 13_10_16_1127_26_683 | 1 | 2.679 | 1.187 | 0.205 | 0.076 | 0.639 | 0.076 | 3.648 | 1.589 | 0.558 | 0.225 | 0.867 | 0.340 |
| 10/16/2013 11:28 | 173_Non-Phe | 13_10_16_1128_27_423 | 1 | 2.679 | 1.025 | 0.205 | 0.077 | 0.725 | 0.073 | 3.648 | 1.586 | 0.558 | 0.234 | 0.867 | 0.312 |
| 10/16/2013 11:29 | 173_Non-Phe | 13_10_16_1129_28_223 | 1 | 2.679 | 1.095 | 0.205 | 0.079 | 0.762 | 0.075 | 3.648 | 1.585 | 0.558 | 0.245 | 0.867 | 0.331 |
| 10/16/2013 11:30 | 173_Non-Phe | 13_10_16_1130_28_963 | 1 | 2.679 | 1.128 | 0.205 | 0.083 | 0.700 | 0.073 | 3.648 | 1.577 | 0.558 | 0.254 | 0.867 | 0.347 |
| 10/16/2013 11:31 | 173_Non-Phe | 13_10_16_1131_29_793 | 1 | 2.679 | 1.039 | 0.205 | 0.074 | 0.762 | 0.073 | 3.648 | 1.581 | 0.558 | 0.250 | 0.867 | 0.307 |
| 10/16/2013 11:32 | 173_Non-Phe | 13_10_16_1132_30_513 | 1 | 2.679 | 1.190 | 0.205 | 0.083 | 0.745 | 0.075 | 3.648 | 1.580 | 0.558 | 0.254 | 0.867 | 0.352 |
| 10/16/2013 11:33 | 173_Non-Phe | 13_10_16_1133_31_273 | 1 | 2.679 | 0.974 | 0.205 | 0.078 | 0.770 | 0.073 | 3.648 | 1.579 | 0.558 | 0.215 | 0.867 | 0.312 |
| 10/16/2013 11:34 | 173_Non-Phe | 13_10_16_1134_32_083 | 1 | 2.679 | 1.125 | 0.205 | 0.073 | 0.735 | 0.071 | 3.648 | 1.585 | 0.558 | 0.200 | 0.867 | 0.341 |
| 10/16/2013 11:35 | 173_Non-Phe | 13_10_16_1135_32_843 | 1 | 2.679 | 1.113 | 0.205 | 0.072 | 0.771 | 0.075 | 3.648 | 1.589 | 0.558 | 0.203 | 0.867 | 0.328 |
| 10/16/2013 11:36 | 173_Non-Phe | 13_10_16_1136_33_654 | 1 | 2.679 | 1.130 | 0.205 | 0.078 | 0.713 | 0.075 | 3.648 | 1.600 | 0.558 | 0.216 | 0.867 | 0.338 |
| 10/16/2013 11:37 | 173_Non-Phe | 13_10_16_1137_34_364 | 1 | 2.679 | 1.075 | 0.205 | 0.075 | 0.788 | 0.077 | 3.648 | 1.612 | 0.558 | 0.208 | 0.867 | 0.317 |
| 10/16/2013 11:38 | 173_Non-Phe | 13_10_16_1138_35_174 | 1 | 2.679 | 1.132 | 0.205 | 0.073 | 0.679 | 0.075 | 3.648 | 1.603 | 0.558 | 0.211 | 0.867 | 0.337 |
| 10/16/2013 11:39 | 173_Non-Phe | 13_10_16_1139_35_894 | 1 | 2.679 | 1.057 | 0.205 | 0.080 | 0.731 | 0.076 | 3.648 | 1.592 | 0.558 | 0.210 | 0.867 | 0.329 |
| 10/16/2013 11:40 | 173_Non-Phe | 13_10_16_1140_36_704 | 1 | 2.679 | 1.068 | 0.205 | 0.067 | 0.713 | 0.073 | 3.648 | 1.591 | 0.558 | 0.192 | 0.867 | 0.315 |
| 10/16/2013 11:41 | 173_Non-Phe | 13_10_16_1141_37_464 | 1 | 2.679 | 1.072 | 0.205 | 0.068 | 0.659 | 0.074 | 3.648 | 1.588 | 0.558 | 0.188 | 0.867 | 0.323 |
| 10/16/2013 11:42 | 173_Non-Phe | 13_10_16_1142_38_184 | 1 | 2.679 | 1.080 | 0.205 | 0.069 | 0.616 | 0.074 | 3.648 | 1.576 | 0.558 | 0.171 | 0.867 | 0.307 |
| 10/16/2013 11:43 | 173_Non-Phe | 13_10_16_1143_38_984 | 1 | 2.679 | 1.031 | 0.205 | 0.075 | 0.676 | 0.072 | 3.648 | 1.590 | 0.558 | 0.193 | 0.867 | 0.325 |
| 10/16/2013 11:44 | 173_Non-Phe | 13_10_16_1144_39_784 | 1 | 2.679 | 1.125 | 0.205 | 0.076 | 0.778 | 0.074 | 3.648 | 1.599 | 0.558 | 0.210 | 0.867 | 0.332 |
| 10/16/2013 11:45 | 173_Non-Phe | 13_10_16_1145_40_504 | 1 | 2.679 | 1.107 | 0.205 | 0.074 | 0.709 | 0.075 | 3.648 | 1.590 | 0.558 | 0.202 | 0.867 | 0.325 |
| 10/16/2013 11:46 | 173_Non-Phe | 13_10_16_1146_41_324 | 1 | 2.679 | 1.086 | 0.205 | 0.069 | 0.755 | 0.073 | 3.648 | 1.588 | 0.558 | 0.189 | 0.867 | 0.316 |
| 10/16/2013 11:47 | 173_Non-Phe | 13_10_16_1147_42_084 | 1 | 2.679 | 1.097 | 0.205 | 0.071 | 0.780 | 0.074 | 3.648 | 1.581 | 0.558 | 0.187 | 0.867 | 0.330 |
| 10/16/2013 11:48 | 173_Non-Phe | 13_10_16_1148_42_895 | 1 | 2.679 | 1.097 | 0.205 | 0.072 | 0.739 | 0.074 | 3.648 | 1.587 | 0.558 | 0.188 | 0.867 | 0.340 |
| 10/16/2013 11:49 | 173_Non-Phe | 13_10_16_1149_43_655 | 1 | 2.679 | 1.040 | 0.205 | 0.073 | 0.770 | 0.072 | 3.648 | 1.581 | 0.558 | 0.194 | 0.867 | 0.328 |
| 10/16/2013 11:50 | 173_Non-Phe | 13_10_16_1150_44_365 | 1 | 2.679 | 1.068 | 0.205 | 0.071 | 0.780 | 0.073 | 3.648 | 1.567 | 0.558 | 0.198 | 0.867 | 0.320 |
| 10/16/2013 11:51 | 173_Non-Phe | 13_10_16_1151_45_185 | 1 | 2.679 | 1.036 | 0.205 | 0.075 | 0.764 | 0.075 | 3.648 | 1.572 | 0.558 | 0.196 | 0.867 | 0.320 |
| 10/16/2013 11:52 | 173_Non-Phe | 13_10_16_1152_45_905 | 1 | 2.679 | 1.109 | 0.205 | 0.075 | 0.801 | 0.075 | 3.648 | 1.569 | 0.558 | 0.207 | 0.867 | 0.340 |
| 10/16/2013 11:53 | 173_Non-Phe | 13_10_16_1153_46_655 | 1 | 2.679 | 1.025 | 0.205 | 0.086 | 0.687 | 0.063 | 3.648 | 1.582 | 0.558 | 0.218 | 0.867 | 0.344 |
| 10/16/2013 11:54 | 173_Non-Phe | 13_10_16_1154_47_485 | 1 | 2.679 | 0.863 | 0.205 | 0.097 | 0.276 | 0.044 | 3.648 | 1.191 | 0.558 | 0.173 | 0.867 | 0.391 |

Average Conc. (ppm): 1 2.679 1.083 0.205 0.072 0.693 0.072 3.648 1.538 0.558 0.186 0.867 0.330

| DHM Run 3        |             |                      |    |                |           |                    |           |                |           |              |           |                       |           |                    |           |
|------------------|-------------|----------------------|----|----------------|-----------|--------------------|-----------|----------------|-----------|--------------|-----------|-----------------------|-----------|--------------------|-----------|
| Date             | Method      | Filename             | DF | Acrolein (ppm) | SEC (ppm) | Formaldehyde (ppm) | SEC (ppm) | Methanol (ppm) | SEC (ppm) | Phenol (ppm) | SEC (ppm) | Propionaldehyde (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) |
| 10/16/2013 12:07 | 173_Non-Phe | 13_10_16_1207_57_256 | 1  | 2.679          | 1.104     | 0.205              | 0.075     | 0.885          | 0.074     | 3.648        | 1.569     | 0.558                 | 0.204     | 0.867              | 0.330     |
| 10/16/2013 12:08 | 173_Non-Phe | 13_10_16_1208_58_076 | 1  | 2.679          | 1.135     | 0.205              | 0.072     | 0.786          | 0.075     | 3.648        | 1.558     | 0.558                 | 0.197     | 0.867              | 0.338     |
| 10/16/2013 12:09 | 173_Non-Phe | 13_10_16_1209_58_826 | 1  | 2.679          | 1.121     | 0.205              | 0.073     | 0.771          | 0.073     | 3.648        | 1.559     | 0.558                 | 0.185     | 0.867              | 0.339     |
| 10/16/2013 12:10 | 173_Non-Phe | 13_10_16_1210_59_526 | 1  | 2.679          | 1.084     | 0.205              | 0.076     | 0.784          | 0.075     | 3.648        | 1.565     | 0.558                 | 0.180     | 0.867              | 0.342     |
| 10/16/2013 12:12 | 173_Non-Phe | 13_10_16_1212_00_327 | 1  | 2.679          | 1.047     | 0.205              | 0.067     | 0.810          | 0.075     | 3.648        | 1.558     | 0.558                 | 0.173     | 0.867              | 0.319     |
| 10/16/2013 12:13 | 173_Non-Phe | 13_10_16_1213_01_027 | 1  | 2.679          | 1.185     | 0.205              | 0.070     | 0.855          | 0.077     | 3.648        | 1.565     | 0.558                 | 0.178     | 0.867              | 0.348     |
| 10/16/2013 12:14 | 173_Non-Phe | 13_10_16_1214_01_787 | 1  | 2.679          | 1.186     | 0.205              | 0.070     | 0.819          | 0.074     | 3.648        | 1.569     | 0.558                 | 0.176     | 0.867              | 0.351     |
| 10/16/2013 12:15 | 173_Non-Phe | 13_10_16_1215_02_607 | 1  | 2.679          | 1.054     | 0.205              | 0.072     | 0.853          | 0.072     | 3.648        | 1.588     | 0.558                 | 0.182     | 0.867              | 0.333     |
| 10/16/2013 12:16 | 173_Non-Phe | 13_10_16_1216_03_317 | 1  | 2.679          | 1.107     | 0.205              | 0.071     | 0.813          | 0.076     | 3.648        | 1.582     | 0.558                 | 0.175     | 0.867              | 0.328     |
| 10/16/2013 12:17 | 173_Non-Phe | 13_10_16_1217_04_127 | 1  | 2.679          | 1.111     | 0.205              | 0.072     | 0.980          | 0.075     | 3.648        | 1.615     | 0.558                 | 0.183     | 0.867              | 0.332     |
| 10/16/2013 12:18 | 173_Non-Phe | 13_10_16_1218_04_847 | 1  | 2.679          | 1.104     | 0.205              | 0.071     | 0.856          | 0.077     | 3.648        | 1.624     | 0.558                 | 0.196     | 0.867              | 0.335     |
| 10/16/2013 12:19 | 173_Non-Phe | 13_10_16_1219_05_647 | 1  | 2.679          | 1.038     | 0.205              | 0.078     | 0.847          | 0.078     | 3.648        | 1.625     | 0.558                 | 0.206     | 0.867              | 0.342     |
| 10/16/2013 12:20 | 173_Non-Phe | 13_10_16_1220_06_357 | 1  | 2.679          | 1.083     | 0.205              | 0.073     | 0.808          | 0.078     | 3.648        | 1.625     | 0.558                 | 0.205     | 0.867              | 0.332     |
| 10/16/2013 12:21 | 173_Non-Phe | 13_10_16_1221_07_137 | 1  | 2.679          | 1.041     | 0.205              | 0.070     | 0.815          | 0.076     | 3.648        | 1.611     | 0.558                 | 0.197     | 0.867              | 0.316     |
| 10/16/2013 12:22 | 173_Non-Phe | 13_10_16_1222_07_907 | 1  | 2.679          | 1.050     | 0.205              | 0.078     | 0.785          | 0.077     | 3.648        | 1.605     | 0.558                 | 0.204     | 0.867              | 0.335     |
| 10/16/2013 12:23 | 173_Non-Phe | 13_10_16_1223_08_667 | 1  | 2.679          | 1.055     | 0.205              | 0.077     | 0.788          | 0.075     | 3.648        | 1.584     | 0.558                 | 0.207     | 0.867              | 0.330     |
| 10/16/2013 12:24 | 173_Non-Phe | 13_10_16_1224_09_398 | 1  | 2.679          | 1.085     | 0.205              | 0.073     | 0.689          | 0.075     | 3.648        | 1.589     | 0.558                 | 0.194     | 0.867              | 0.328     |
| 10/16/2013 12:25 | 173_Non-Phe | 13_10_16_1225_10_208 | 1  | 2.679          | 1.087     | 0.205              | 0.071     | 0.697          | 0.077     | 3.648        | 1.597     | 0.558                 | 0.193     | 0.867              | 0.332     |
| 10/16/2013 12:26 | 173_Non-Phe | 13_10_16_1226_11_008 | 1  | 2.679          | 1.128     | 0.205              | 0.070     | 0.868          | 0.077     | 3.648        | 1.598     | 0.558                 | 0.186     | 0.867              | 0.330     |
| 10/16/2013 12:27 | 173_Non-Phe | 13_10_16_1227_11_718 | 1  | 2.679          | 1.092     | 0.205              | 0.067     | 0.841          | 0.074     | 3.648        | 1.602     | 0.558                 | 0.189     | 0.867              | 0.322     |
| 10/16/2013 12:28 | 173_Non-Phe | 13_10_16_1228_12_528 | 1  | 2.679          | 1.058     | 0.205              | 0.074     | 0.789          | 0.075     | 3.648        | 1.615     | 0.558                 | 0.200     | 0.867              | 0.334     |
| 10/16/2013 12:29 | 173_Non-Phe | 13_10_16_1229_13_248 | 1  | 2.679          | 1.140     | 0.205              | 0.073     | 0.800          | 0.077     | 3.648        | 1.608     | 0.558                 | 0.193     | 0.867              | 0.340     |
| 10/16/2013 12:30 | 173_Non-Phe | 13_10_16_1230_13_968 | 1  | 2.679          | 1.069     | 0.205              | 0.077     | 0.755          | 0.076     | 3.648        | 1.623     | 0.558                 | 0.192     | 0.867              |           |

| Company/ACT<br>Analyst Initials STG<br>Parameters/EPA Method 320 |       |       |       |       |       |       |       |       |       | Client #/Amory<br>Job # 0913-173<br>sample # 4 |       |       |       |
|------------------------------------------------------------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|------------------------------------------------|-------|-------|-------|
| 10/16/2013 13:24 173_Non-Phe 13_10_16_1324_05_290                | 1     | 2.679 | 1.091 | 0.205 | 0.072 | 0.851 | 0.077 | 3.648 | 1.598 | 0.558                                          | 0.207 | 0.867 | 0.338 |
| 10/16/2013 13:25 173_Non-Phe 13_10_16_1325_06_110                | 1     | 2.679 | 1.065 | 0.205 | 0.076 | 0.926 | 0.078 | 3.648 | 1.604 | 0.558                                          | 0.232 | 0.867 | 0.320 |
| 10/16/2013 13:26 173_Non-Phe 13_10_16_1326_06_890                | 1     | 2.679 | 1.114 | 0.205 | 0.080 | 0.982 | 0.079 | 3.648 | 1.613 | 0.558                                          | 0.244 | 0.867 | 0.327 |
| 10/16/2013 13:27 173_Non-Phe 13_10_16_1327_07_651                | 1     | 2.679 | 1.172 | 0.205 | 0.076 | 0.993 | 0.079 | 3.648 | 1.615 | 0.558                                          | 0.232 | 0.867 | 0.339 |
| 10/16/2013 13:28 173_Non-Phe 13_10_16_1328_08_371                | 1     | 2.679 | 1.178 | 0.205 | 0.080 | 1.037 | 0.081 | 3.648 | 1.633 | 0.558                                          | 0.231 | 0.867 | 0.343 |
| 10/16/2013 13:29 173_Non-Phe 13_10_16_1329_09_101                | 1     | 2.679 | 1.160 | 0.205 | 0.077 | 0.920 | 0.081 | 3.648 | 1.656 | 0.558                                          | 0.221 | 0.867 | 0.347 |
| 10/16/2013 13:30 173_Non-Phe 13_10_16_1330_09_901                | 1     | 2.679 | 1.135 | 0.205 | 0.080 | 0.940 | 0.083 | 3.648 | 1.670 | 0.558                                          | 0.230 | 0.867 | 0.341 |
| 10/16/2013 13:31 173_Non-Phe 13_10_16_1331_10_691                | 1     | 2.679 | 1.152 | 0.205 | 0.083 | 0.911 | 0.081 | 3.648 | 1.674 | 0.558                                          | 0.231 | 0.867 | 0.355 |
| 10/16/2013 13:32 173_Non-Phe 13_10_16_1332_11_411                | 1     | 2.679 | 1.101 | 0.205 | 0.080 | 0.954 | 0.084 | 3.648 | 1.682 | 0.558                                          | 0.231 | 0.867 | 0.338 |
| 10/16/2013 13:33 173_Non-Phe 13_10_16_1333_12_131                | 1     | 2.679 | 1.237 | 0.205 | 0.080 | 0.912 | 0.082 | 3.648 | 1.676 | 0.558                                          | 0.239 | 0.867 | 0.353 |
| 10/16/2013 13:34 173_Non-Phe 13_10_16_1334_12_951                | 1     | 2.679 | 1.143 | 0.205 | 0.082 | 0.937 | 0.084 | 3.648 | 1.667 | 0.558                                          | 0.248 | 0.867 | 0.332 |
| 10/16/2013 13:35 173_Non-Phe 13_10_16_1335_13_701                | 1     | 2.679 | 1.140 | 0.205 | 0.082 | 1.005 | 0.083 | 3.648 | 1.653 | 0.558                                          | 0.247 | 0.867 | 0.340 |
| 10/16/2013 13:36 173_Non-Phe 13_10_16_1336_14_461                | 1     | 2.679 | 1.188 | 0.205 | 0.085 | 0.929 | 0.082 | 3.648 | 1.648 | 0.558                                          | 0.245 | 0.867 | 0.345 |
| 10/16/2013 13:37 173_Non-Phe 13_10_16_1337_15_271                | 1     | 2.679 | 1.127 | 0.205 | 0.081 | 1.013 | 0.082 | 3.648 | 1.652 | 0.558                                          | 0.246 | 0.867 | 0.341 |
| 10/16/2013 13:38 173_Non-Phe 13_10_16_1338_15_941                | 1     | 2.679 | 1.121 | 0.205 | 0.084 | 1.067 | 0.081 | 3.648 | 1.655 | 0.558                                          | 0.257 | 0.867 | 0.342 |
| 10/16/2013 13:39 173_Non-Phe 13_10_16_1339_16_752                | 1     | 2.679 | 1.070 | 0.205 | 0.080 | 0.951 | 0.081 | 3.648 | 1.634 | 0.558                                          | 0.234 | 0.867 | 0.327 |
| 10/16/2013 13:40 173_Non-Phe 13_10_16_1340_17_442                | 1     | 2.679 | 1.140 | 0.205 | 0.076 | 0.950 | 0.083 | 3.648 | 1.634 | 0.558                                          | 0.218 | 0.867 | 0.350 |
| 10/16/2013 13:41 173_Non-Phe 13_10_16_1341_18_272                | 1     | 2.679 | 1.124 | 0.205 | 0.075 | 0.874 | 0.079 | 3.648 | 1.636 | 0.558                                          | 0.215 | 0.867 | 0.340 |
| 10/16/2013 13:42 173_Non-Phe 13_10_16_1342_18_982                | 1     | 2.679 | 1.106 | 0.205 | 0.076 | 0.824 | 0.080 | 3.648 | 1.624 | 0.558                                          | 0.200 | 0.867 | 0.330 |
| 10/16/2013 13:43 173_Non-Phe 13_10_16_1343_19_792                | 1     | 2.679 | 1.074 | 0.205 | 0.070 | 0.787 | 0.076 | 3.648 | 1.625 | 0.558                                          | 0.181 | 0.867 | 0.326 |
| 10/16/2013 13:44 173_Non-Phe 13_10_16_1344_20_512                | 1     | 2.679 | 1.102 | 0.205 | 0.071 | 0.724 | 0.079 | 3.648 | 1.615 | 0.558                                          | 0.173 | 0.867 | 0.342 |
| 10/16/2013 13:45 173_Non-Phe 13_10_16_1345_21_252                | 1     | 2.679 | 1.027 | 0.205 | 0.069 | 0.766 | 0.080 | 3.648 | 1.637 | 0.558                                          | 0.161 | 0.867 | 0.323 |
| 10/16/2013 13:46 173_Non-Phe 13_10_16_1346_22_032                | 1     | 2.679 | 1.092 | 0.205 | 0.071 | 0.780 | 0.081 | 3.648 | 1.653 | 0.558                                          | 0.160 | 0.867 | 0.335 |
| 10/16/2013 13:47 173_Non-Phe 13_10_16_1347_22_792                | 1     | 2.679 | 1.159 | 0.205 | 0.068 | 0.877 | 0.080 | 3.648 | 1.671 | 0.558                                          | 0.160 | 0.867 | 0.342 |
| 10/16/2013 13:48 173_Non-Phe 13_10_16_1348_23_542                | 1     | 2.679 | 1.138 | 0.205 | 0.067 | 0.894 | 0.082 | 3.648 | 1.686 | 0.558                                          | 0.163 | 0.867 | 0.336 |
| 10/16/2013 13:49 173_Non-Phe 13_10_16_1349_24_252                | 1     | 2.679 | 1.145 | 0.205 | 0.068 | 0.842 | 0.081 | 3.648 | 1.692 | 0.558                                          | 0.164 | 0.867 | 0.345 |
| 10/16/2013 13:50 173_Non-Phe 13_10_16_1350_25_052                | 1     | 2.679 | 1.181 | 0.205 | 0.076 | 0.886 | 0.084 | 3.648 | 1.692 | 0.558                                          | 0.179 | 0.867 | 0.353 |
| 10/16/2013 13:51 173_Non-Phe 13_10_16_1351_25_803                | 1     | 2.679 | 1.140 | 0.205 | 0.069 | 0.840 | 0.082 | 3.648 | 1.695 | 0.558                                          | 0.170 | 0.867 | 0.329 |
| 10/16/2013 13:52 173_Non-Phe 13_10_16_1352_26_603                | 1     | 2.679 | 1.105 | 0.205 | 0.074 | 0.795 | 0.081 | 3.648 | 1.675 | 0.558                                          | 0.179 | 0.867 | 0.341 |
| 10/16/2013 13:53 173_Non-Phe 13_10_16_1353_27_313                | 1     | 2.679 | 1.177 | 0.205 | 0.069 | 0.885 | 0.079 | 3.648 | 1.675 | 0.558                                          | 0.165 | 0.867 | 0.337 |
| 10/16/2013 13:54 173_Non-Phe 13_10_16_1354_28_013                | 1     | 2.679 | 1.152 | 0.205 | 0.069 | 0.902 | 0.079 | 3.648 | 1.674 | 0.558                                          | 0.162 | 0.867 | 0.345 |
| 10/16/2013 13:55 173_Non-Phe 13_10_16_1355_28_823                | 1     | 2.679 | 1.186 | 0.205 | 0.066 | 0.868 | 0.083 | 3.648 | 1.673 | 0.558                                          | 0.161 | 0.867 | 0.343 |
| 10/16/2013 13:56 173_Non-Phe 13_10_16_1356_29_593                | 1     | 2.679 | 1.103 | 0.205 | 0.070 | 0.913 | 0.082 | 3.648 | 1.681 | 0.558                                          | 0.160 | 0.867 | 0.336 |
| 10/16/2013 13:57 173_Non-Phe 13_10_16_1357_30_333                | 1     | 2.679 | 1.129 | 0.205 | 0.073 | 0.868 | 0.083 | 3.648 | 1.699 | 0.558                                          | 0.170 | 0.867 | 0.336 |
| 10/16/2013 13:58 173_Non-Phe 13_10_16_1358_31_053                | 1     | 2.679 | 1.104 | 0.205 | 0.070 | 0.963 | 0.084 | 3.648 | 1.702 | 0.558                                          | 0.168 | 0.867 | 0.346 |
| 10/16/2013 13:59 173_Non-Phe 13_10_16_1359_31_863                | 1     | 2.679 | 1.263 | 0.205 | 0.070 | 0.881 | 0.084 | 3.648 | 1.692 | 0.558                                          | 0.162 | 0.867 | 0.359 |
| 10/16/2013 14:00 173_Non-Phe 13_10_16_1400_32_603                | 1     | 2.679 | 1.189 | 0.205 | 0.071 | 0.772 | 0.083 | 3.648 | 1.680 | 0.558                                          | 0.157 | 0.867 | 0.356 |
| 10/16/2013 14:01 173_Non-Phe 13_10_16_1401_33_323                | 1     | 2.679 | 1.147 | 0.205 | 0.068 | 0.749 | 0.082 | 3.648 | 1.656 | 0.558                                          | 0.159 | 0.867 | 0.341 |
| 10/16/2013 14:02 173_Non-Phe 13_10_16_1402_34_073                | 1     | 2.679 | 1.143 | 0.205 | 0.074 | 0.823 | 0.079 | 3.648 | 1.642 | 0.558                                          | 0.174 | 0.867 | 0.342 |
| 10/16/2013 14:03 173_Non-Phe 13_10_16_1403_34_794                | 1     | 2.679 | 1.079 | 0.205 | 0.067 | 0.882 | 0.079 | 3.648 | 1.637 | 0.558                                          | 0.179 | 0.867 | 0.309 |
| 10/16/2013 14:04 173_Non-Phe 13_10_16_1404_35_484                | 1     | 2.679 | 1.046 | 0.205 | 0.074 | 0.855 | 0.078 | 3.648 | 1.632 | 0.558                                          | 0.187 | 0.867 | 0.316 |
| 10/16/2013 14:05 173_Non-Phe 13_10_16_1405_36_184                | 1     | 2.679 | 1.091 | 0.205 | 0.076 | 0.825 | 0.079 | 3.648 | 1.631 | 0.558                                          | 0.192 | 0.867 | 0.350 |
| 10/16/2013 14:06 173_Non-Phe 13_10_16_1406_36_954                | 1     | 2.679 | 1.115 | 0.205 | 0.075 | 0.840 | 0.079 | 3.648 | 1.636 | 0.558                                          | 0.190 | 0.867 | 0.341 |
| 10/16/2013 14:07 173_Non-Phe 13_10_16_1407_37_704                | 1     | 2.679 | 1.192 | 0.205 | 0.077 | 0.828 | 0.079 | 3.648 | 1.631 | 0.558                                          | 0.190 | 0.867 | 0.349 |
| 10/16/2013 14:08 173_Non-Phe 13_10_16_1408_38_404                | 1     | 2.679 | 1.097 | 0.205 | 0.072 | 0.788 | 0.078 | 3.648 | 1.639 | 0.558                                          | 0.185 | 0.867 | 0.338 |
| 10/16/2013 14:09 173_Non-Phe 13_10_16_1409_39_214                | 1     | 2.679 | 1.132 | 0.205 | 0.073 | 0.824 | 0.080 | 3.648 | 1.651 | 0.558                                          | 0.180 | 0.867 | 0.342 |
| 10/16/2013 14:10 173_Non-Phe 13_10_16_1410_39_914                | 1     | 2.679 | 1.171 | 0.205 | 0.069 | 0.789 | 0.081 | 3.648 | 1.670 | 0.558                                          | 0.167 | 0.867 | 0.343 |
| 10/16/2013 14:11 173_Non-Phe 13_10_16_1411_40_714                | 1     | 2.679 | 1.163 | 0.205 | 0.074 | 0.812 | 0.078 | 3.648 | 1.664 | 0.558                                          | 0.182 | 0.867 | 0.350 |
| 10/16/2013 14:12 173_Non-Phe 13_10_16_1412_41_424                | 1     | 2.679 | 1.165 | 0.205 | 0.075 | 0.824 | 0.082 | 3.648 | 1.681 | 0.558                                          | 0.188 | 0.867 | 0.350 |
| 10/16/2013 14:13 173_Non-Phe 13_10_16_1413_42_174                | 1     | 2.679 | 1.102 | 0.205 | 0.074 | 0.826 | 0.081 | 3.648 | 1.663 | 0.558                                          | 0.196 | 0.867 | 0.334 |
| 10/16/2013 14:14 173_Non-Phe 13_10_16_1414_42_985                | 1     | 2.679 | 1.164 | 0.205 | 0.076 | 0.743 | 0.079 | 3.648 | 1.656 | 0.558                                          | 0.189 | 0.867 | 0.352 |
| 10/16/2013 14:15 173_Non-Phe 13_10_16_1415_43_685                | 1     | 2.679 | 1.088 | 0.205 | 0.074 | 0.793 | 0.077 | 3.648 | 1.652 | 0.558                                          | 0.198 | 0.867 | 0.332 |
| 10/16/2013 14:16 173_Non-Phe 13_10_16_1416_44_515                | 1     | 2.679 | 1.115 | 0.205 | 0.074 | 0.693 | 0.079 | 3.648 | 1.636 | 0.558                                          | 0.192 | 0.867 | 0.339 |
| 10/16/2013 14:17 173_Non-Phe 13_10_16_1417_45_225                | 1     | 2.679 | 1.147 | 0.205 | 0.075 | 0.662 | 0.078 | 3.648 | 1.629 | 0.558                                          | 0.187 | 0.867 | 0.347 |
| 10/16/2013 14:18 173_Non-Phe 13_10_16_1418_45_945                | 1     | 2.679 | 1.111 | 0.205 | 0.071 | 0.713 | 0.077 | 3.648 | 1.646 | 0.558                                          | 0.187 | 0.867 | 0.332 |
| 10/16/2013 14:19 173_Non-Phe 13_10_16_1419_46_755                | 1     | 2.679 | 1.208 | 0.205 | 0.077 | 0.841 | 0.081 | 3.648 | 1.663 | 0.558                                          | 0.203 | 0.867 | 0.357 |
| Average Conc. (ppm):                                             |       |       |       |       |       |       |       |       |       |                                                |       |       |       |
| 1                                                                | 2.679 | 1.131 | 0.205 | 0.074 | 0.858 | 0.080 | 3.648 | 1.651 | 0.558 | 0.194                                          | 0.867 | 0.339 |       |



| Location                  | Disc.                  | #        | Start/Stop | Instrument     | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                    |           |              |
|---------------------------|------------------------|----------|------------|----------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|--------------------|-----------|--------------|
| Date                      | Method                 | Filename | DF         | Acroline (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur Hexafluoride (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/14/2013 12:14 0917-173 | Ne13_10_14_1214_32_631 | 1        | 0.021      | 1.4            | 0.001              | 0.43               | 1.5                      | 0.03               | 0.40               | 0.001           | 0.40               | 0.023                 | 0.83      | 0.041                     | 0.421     | -1.132             |           |              |
| 10/14/2013 12:14 0917-173 | Ne13_10_14_1214_32_631 | 1        | -2.7       | 1.4            | 0.131              | 0.084              | -0.28                    | 1.60               | 0.1540             | 0.0970          | -0.0440            | 0.137                 | 0.049     | 0.642                     | 1.57      | 0.437              | -2.06     |              |
| 10/14/2013 12:14 0917-173 | Ne13_10_14_1214_32_631 | 1        | 0.5        | 1.5            | 0.123              | 0.083              | -0.41                    | 1.63               | 0.049              | 0.1210          | -0.275             | 0.133                 | 0.053     | 0.649                     | -0.28     | 0.446              | -0.504    |              |
| 10/14/2013 12:15 0917-173 | Ne13_10_14_1215_36_721 | 1        | -3.2       | 1.4            | 0.186              | 0.086              | -0.56                    | 1.64               | -0.002             | 0.1110          | -0.215             | 0.136                 | 0.065     | 0.657                     | 0.706     | 0.444              | -2.111    |              |
| 10/14/2013 12:15 0917-173 | Ne13_10_14_1215_36_721 | 1        | 0.1        | 1.5            | 0.266              | 0.078              | -0.46                    | 1.64               | 0.116              | 0.090           | -0.0060            | 0.134                 | 0.056     | 0.658                     | 0.201     | 0.447              | -2.111    |              |
| 10/14/2013 12:15 0917-173 | Ne13_10_14_1215_46_821 | 1        | -4.2       | 1.5            | 0.1490             | 0.087              | -0.46                    | 1.65               | 0.01200            | 0.1050          | -0.223             | 0.139                 | 0.060     | 0.659                     | 0.398     | 0.442              | -2.113    |              |
| 10/14/2013 12:16 0917-173 | Ne13_10_14_1216_46_821 | 1        | -0.5       | 1.5            | -0.042             | 0.082              | -0.50                    | 1.64               | -0.0010            | 0.1030          | -0.366             | 0.135                 | 0.048     | 0.660                     | 1.19      | 0.432              | -2.097    |              |
| 10/14/2013 12:16 0917-173 | Ne13_10_14_1216_46_821 | 1        | -0.0800    | 0.084          | 0.47               | 0.057              | 0.0590                   | 0.1160             | 0.138              | -0.0540         | 0.138              | 0.057                 | 0.661     | 0.56                      | 0.046     | 0.54               | -2.1      |              |
| 10/14/2013 12:16 0917-173 | Ne13_10_14_1216_46_821 | 1        | 0.5        | 1.5            | -0.033             | 0.081              | -0.57                    | 1.65               | -0.210             | 0.1090          | -0.061             | 0.132                 | 0.055     | 0.660                     | 0.626     | 0.434              | -2.122    |              |
| 10/14/2013 12:17 0917-173 | Ne13_10_14_1217_01_001 | 1        | -0.1       | 1.5            | 0.2150             | 0.077              | -0.48                    | 1.65               | 0.318              | 0.0880          | -0.191             | 0.128                 | 0.057     | 0.661                     | 0.579     | 0.432              | -2.083    |              |
| 10/14/2013 12:17 0917-173 | Ne13_10_14_1217_19_511 | 1        | -1.8       | 1.7            | 0.165              | 0.083              | -0.51                    | 1.65               | -0.0680            | 0.1070          | 0.281              | 0.139                 | 0.061     | 0.660                     | 0.652     | 0.472              | -2.103    |              |
| 10/14/2013 12:17 0917-173 | Ne13_10_14_1217_36_051 | 1        | 1.5        | 1.6            | 0.075              | 0.079              | -0.38                    | 1.65               | 0.168              | 0.1080          | -0.150             | 0.132                 | 0.067     | 0.659                     | 1.49      | 0.454              | -2.101    |              |
| 10/14/2013 12:17 0917-173 | Ne13_10_14_1217_56_641 | 1        | 0.9        | 1.5            | 0.167              | 0.085              | -0.52                    | 1.64               | 0.170              | 0.1100          | -0.117             | 0.138                 | 0.062     | 0.663                     | 1.47      | 0.449              | -2.123    |              |
| 10/14/2013 12:18 0917-173 | Ne13_10_14_1218_15_151 | 1        | -3.1       | 1.5            | 0.0100             | 0.076              | -0.55                    | 1.65               | -0.0680            | 0.1090          | -0.0660            | 0.132                 | 0.063     | 0.660                     | -0.75     | 0.435              | -2.127    |              |
| 10/14/2013 12:18 0917-173 | Ne13_10_14_1218_30_481 | 1        | -0.3       | 1.6            | 0.184              | 0.079              | -0.49                    | 1.65               | 0.0990             | 0.1040          | -0.174             | 0.130                 | 0.060     | 0.662                     | 0.892     | 0.429              | -2.115    |              |
| 10/14/2013 12:18 0917-173 | Ne13_10_14_1218_52_391 | 1        | 0.6        | 1.6            | 0.2580             | 0.080              | -0.76                    | 1.66               | 0.092              | 0.1010          | -0.353             | 0.135                 | 0.062     | 0.660                     | 0.483     | 0.451              | -2.132    |              |
| 10/14/2013 12:19 0917-173 | Ne13_10_14_1219_10_741 | 1        | 4.4        | 1.4            | -0.0290            | 0.078              | -0.36                    | 1.65               | 0.161              | 0.1190          | -0.136             | 0.128                 | 0.059     | 0.660                     | 0.92      | 0.424              | -2.113    |              |
| 10/14/2013 12:19 0917-173 | Ne13_10_14_1219_29_331 | 1        | 1.9        | 1.5            | 0.133              | 0.084              | -0.50                    | 1.65               | 0.0250             | 0.1130          | -0.053             | 0.136                 | 0.056     | 0.661                     | 0.5410    | 0.434              | -2.142    |              |
| 10/14/2013 12:19 0917-173 | Ne13_10_14_1219_47_881 | 1        | 0.6        | 1.6            | 0.2660             | 0.078              | -0.56                    | 1.65               | 0.030              | 0.1180          | 0.141              | 0.143                 | 0.057     | 0.662                     | 0.0590    | 0.443              | -2.109    |              |
| 10/14/2013 12:20 0917-173 | Ne13_10_14_1220_06_371 | 1        | 1.3        | 1.5            | 0.060              | 0.082              | -0.55                    | 1.65               | -0.211             | 0.1080          | -0.174             | 0.135                 | 0.048     | 0.660                     | 0.639     | 0.456              | -2.164    |              |
| 10/14/2013 12:20 0917-173 | Ne13_10_14_1220_24_991 | 1        | -2.0       | 1.5            | -0.061             | 0.082              | -0.37                    | 1.65               | 0.0280             | 0.1110          | -0.003             | 0.135                 | 0.059     | 0.658                     | 0.74      | 0.457              | -2.129    |              |
| 10/14/2013 12:20 0917-173 | Ne13_10_14_1220_46_481 | 1        | -1.3       | 1.6            | 0.034              | 0.078              | -0.45                    | 1.65               | -0.333             | 0.1040          | -0.063             | 0.138                 | 0.061     | 0.651                     | 0.99      | 0.439              | -2.152    |              |
| 10/14/2013 12:21 0917-173 | Ne13_10_14_1221_01_501 | 1        | -3.9       | 1.6            | 0.127              | 0.079              | -0.64                    | 1.66               | 0.180              | 0.1200          | 0.152              | 0.136                 | 0.064     | 0.655                     | -0.246    | 0.471              | -2.131    |              |
| 10/14/2013 12:21 0917-173 | Ne13_10_14_1221_20_611 | 1        | -3.1       | 1.5            | 0.038              | 0.082              | -0.49                    | 1.65               | 0.0010             | 0.0980          | -0.240             | 0.133                 | 0.064     | 0.659                     | 1.793     | 0.432              | -2.136    |              |
| 10/14/2013 12:21 0917-173 | Ne13_10_14_1221_39_101 | 1        | 0.4        | 1.6            | 0.1850             | 0.084              | -0.43                    | 1.65               | 0.138              | 0.0950          | -0.216             | 0.138                 | 0.050     | 0.659                     | -0.15     | 0.452              | -2.15     |              |
| 10/14/2013 12:21 0917-173 | Ne13_10_14_1221_57_711 | 1        | 1.5        | 0.6            | 0.124              | 0.082              | -0.57                    | 1.64               | 0.042              | 0.1070          | -0.071             | 0.134                 | 0.062     | 0.660                     | 0.216     | 0.450              | -2.109    |              |
| 10/14/2013 12:22 0917-173 | Ne13_10_14_1222_16_192 | 1        | -2.1       | 1.6            | -0.034             | 0.083              | -0.40                    | 1.65               | -0.0260            | 0.1080          | -0.274             | 0.139                 | 0.056     | 0.663                     | -0.09     | 0.465              | -2.108    |              |
| 10/14/2013 12:22 0917-173 | Ne13_10_14_1222_34_662 | 1        | 0.5        | 1.5            | 0.096              | 0.078              | -0.58                    | 1.65               | 0.0240             | 0.0970          | -0.044             | 0.130                 | 0.049     | 0.660                     | 0.4480    | 0.442              | -2.153    |              |
| 10/14/2013 12:22 0917-173 | Ne13_10_14_1222_54_282 | 1        | 0.8        | 1.4            | 0.103              | 0.082              | -0.50                    | 1.65               | 0.1220             | 0.1040          | -0.140             | 0.132                 | 0.061     | 0.661                     | 0.602     | 0.450              | -2.126    |              |
| 10/14/2013 12:23 0917-173 | Ne13_10_14_1224_16_782 | 1        | 1.9        | 1.6            | 0.180              | 0.081              | -0.40                    | 1.65               | 0.080              | 0.1020          | -0.077             | 0.136                 | 0.062     | 0.660                     | 0.68      | 0.420              | -2.149    |              |
| 10/14/2013 12:24 0917-173 | Ne13_10_14_1244_45_830 | 1        | 1.68       | 0.992          | -0.1870            | 0.162              | -0.071                   | 0.879              | -0.053             | 0.1070          | 1.372              | 0.214                 | 3.39      | 0.0210                    | 0.846     | 0.336              | 0.698     |              |
| 10/14/2013 12:45 0917-173 | Ne13_10_14_1245_46_590 | 1        | -0.09      | 0.951          | -0.127             | 0.169              | -0.108                   | 0.918              | -0.107             | 0.1060          | 1.45               | 0.227                 | 3.42      | 0.0220                    | 0.678     | 0.338              | 0.73      |              |
| 10/14/2013 12:46 0917-173 | Ne13_10_14_1246_47_390 | 1        | 0.76       | 1.041          | -0.176             | 0.177              | -0.124                   | 0.917              | -0.091             | 0.110           | 1.45               | 0.227                 | 3.42      | 0.0220                    | 0.346     | 0.346              | 0.721     |              |
| 10/14/2013 12:47 0917-173 | Ne13_10_14_1247_48_200 | 1        | 0.65       | 0.921          | -0.0260            | 0.173              | -0.137                   | 0.943              | -0.099             | 0.1110          | 1.45               | 0.227                 | 3.42      | 0.0220                    | 0.465     | 0.339              | 0.733     |              |
| 10/14/2013 12:48 0917-173 | Ne13_10_14_1248_48_990 | 1        | 0.88       | 0.959          | -0.238             | 0.171              | -0.145                   | 0.944              | -0.1220            | 0.1120          | 1.59               | 0.227                 | 3.42      | 0.0220                    | 0.406     | 0.345              | 0.706     |              |
| 10/14/2013 12:49 0917-173 | Ne13_10_14_1249_49_730 | 1        | -0.22      | 0.972          | -0.2430            | 0.1760             | -0.115                   | 0.944              | -0.007             | 0.1180          | 1.44               | 0.227                 | 3.42      | 0.0220                    | 0.849     | 0.337              | 0.72      |              |
| 10/14/2013 12:50 0917-173 | Ne13_10_14_1250_49_530 | 1        | -0.15      | 1.018          | -0.178             | 0.178              | -0.118                   | 0.951              | -0.099             | 0.1120          | 1.47               | 0.227                 | 3.42      | 0.0220                    | 0.717     | 0.355              | 0.716     |              |
| 10/14/2013 12:51 0917-173 | Ne13_10_14_1251_51_330 | 1        | 1.22       | 0.838          | -0.293             | 0.153              | -0.99                    | 0.823              | 0.050              | 0.0980          | 1.19               | 0.196                 | 2.91      | 0.0190                    | 0.684     | 0.293              | 0.706     |              |
| 10/14/2013 12:52 0917-173 | Ne13_10_14_1252_52_020 | 1        | 0.37       | 0.817          | -0.136             | 0.150              | -0.99                    | 0.822              | 0.1180             | 0.0970          | 1.24               | 0.196                 | 2.91      | 0.0210                    | 0.439     | 0.287              | 0.736     |              |
| 10/14/2013 12:53 0917-173 | Ne13_10_14_1253_53_871 | 1        | 0.63       | 0.858          | -0.030             | 0.149              | -0.99                    | 0.824              | -0.005             | 0.1020          | 1.29               | 0.196                 | 2.91      | 0.0210                    | 0.695     | 0.288              | 0.711     |              |
| 10/14/2013 12:54 0917-173 | Ne13_10_14_1254_53_881 | 1        | -0.72      | 0.868          | -0.222             | 0.154              | -100                     | 0.816              | -0.037             | 0.0990          | 1.34               | 0.204                 | 2.91      | 0.0200                    | 0.430     | 0.288              | 0.709     |              |
| 10/14/2013 12:55 0917-173 | Ne13_10_14_1255_54_371 | 1        | 1.26       | 0.880          | -0.218             | 0.154              | -100                     | 0.825              | 0.002              | 0.0920          | 1.27               | 0.199                 | 2.92      | 0.0200                    | 1.200     | 0.290              | 0.714     |              |
| 10/14/2013 12:56 0917-173 | Ne13_10_14_1256_54_131 | 1        | -3.23      | 0.970          | -0.127             | 0.152              | -100                     | 0.827              | 0.012              | 0.0990          | 1.41               | 0.198                 | 2.91      | 0.0200                    | 0.526     | 0.281              | 0.712     |              |
| 10/14/2013 12:57 0917-173 | Ne13_10_14_1257_54_951 | 1        | -0.57      | 0.987          | -0.060             | 0.150              | -100                     | 0.860              | 0.152              | 0.0980          | 1.38               | 0.198                 | 2.91      | 0.0210                    | 0.388     | 0.280              | 0.709     |              |
| 10/14/2013 13:01 0917-173 | Ne13_10_14_1311_12_192 | 1        | -1.19      | 1.934          | 4.04               | 0.107              | 2.55                     | 0.302              | 0.163              | 2.12            | -0.400             | 0.177                 | 0.00900   | 0.0160                    | 0.59      | 0.562              | 0.788     |              |
| 10/14/2013 13:14 0917-173 | Ne13_10_14_1314_11_372 | 1        | -3.318     | 1.895          | 3.77               | 0.107              | 2.14                     | 0.302              | 0.055              | 2.11            | -0.422             | 0.176                 | 0.00900   | 0.0160                    | 0.06      | 0.571              | 0.672     |              |
| 10/14/2013 13:15 0917-173 | Ne13_10_14_1315_11_382 | 1        | -2.89      | 1.851          | 2.15               | 0.107              | 2.15                     | 0.302              | 0.055              | 2.11            | -0.422             | 0.176                 | 0.00900   | 0.0160                    | 0.06      | 0.571              | 0.672     |              |
| 10/14/2013 13:16 0917-173 | Ne13_10_14_1316_14_982 | 1        | -2.43      | 1.85           | 2.12               | 0.109              | 2.29                     | 0.290              | 0.0720             | 2.14            | -0.3400            | 0.179                 | 0.0100    | 0.0200                    | 0.63      | 0.556              | 0.718     |              |
| 10/14/2013 13:17 0917-173 | Ne13_10_14_1317_15_753 | 1        | -1.50      | 1.90           | 7.69               | 0.112              | 2.44                     | 0.283              | 0.0210             | 2.16            | -0.4030            | 0.181                 | 0.01      | 0.0210                    | 0.48      | 0.558              | 0.511     |              |
| 10/14/2013 13:18 0917-173 | Ne13_10_14_1318_16_493 | 1        | -1.80      | 1.92           | 7.91               | 0.113              | 2.45                     | 0.285              | 0.066              | 2.14            | -0.3290            | 0.183                 | 0.01      | 0.0210                    | 1.32      | 0.570              | 0.649     |              |
| 10/14/2013 13:19 0917-173 | Ne13_10_14_1319_17_213 | 1        | -1.54      | 2.021          | 4.89               | 0.116              | 2.31                     | 0.297              | 0.060              | 2.12            | -0.383             | 0.186                 | 0.0088    | 0.0170                    | 0.20      | 0.593              | 0.603     |              |
| 10/14/2013 13:20 0917-173 | Ne13_10_14_1320_18_043 | 1        | -2.710     | 1.914          | 3.76               | 0.102              | 2.11                     | 0.302              | 0.100              | 2.14            | -0.549             | 0.173                 | 0.00900   | 0.0170                    | 0.31      | 0.568              | 0.68      |              |
| 10/14/2013 13:21 0917-173 | Ne13_10_14_1321_18_863 | 1        | -2.403     | 1.978          | 4.18               | 0.110              | 2.09                     | 0.299              | 0.198              | 2.14            | -0.715             | 0.182                 | 0.00800   | 0.0180                    | 0.289     | 0.574              | 0.682     |              |
| 10/14/2013 13:22 0917-173 | Ne13_10_14_1322_19_563 | 1        | -2.613     | 1.884          | 2.55               | 0.106              | 1.96                     | 0.307              | 0.155              | 2.13            | -0.691             | 0.176                 | 0.00300   | 0.0150                    | 0.11      | 0.563              | 0.758     |              |
| 10/14/2013 13:23 0917-173 | Ne13_10_14_1323_20_353 | 1        | -2.81      | 1.928          | 2.18               | 0.106              | 1.96                     | 0.307              | 0.155              | 2.13            | -0.691             | 0.176                 | 0.00300   | 0.0150                    | 0.11      | 0.563              | 0.758     |              |
| 10/14/2013 13:24 0917-173 | Ne13_10_14_1324_21_163 | 1        | -0.017     | 1.864          | 0.814              | 0.108              | 1.78                     | 0.337              | 0.109              | 2.11            | -0.581             |                       |           |                           |           |                    |           |              |



112

| Location                                          | Disc.  | #        | Start/Stop | Instrument     | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                    |           |              |
|---------------------------------------------------|--------|----------|------------|----------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|--------------------|-----------|--------------|
| Date                                              | Method | Filename | OF         | Acroline (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur Hexafluoride (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/14/2013 19:47 0917-173, Ne13,10,14,1947,27,905 | 1      | 0.240    | 0.735      | 0.441          | 0.240              | 0.735              | 0.441                    | 0.240              | 0.735              | 0.441           | 0.240              | 0.735                 | 0.441     | 0.240                     | 0.735     | 0.441              | 0.240     | 0.735        |
| 10/14/2013 19:47 0917-173, Ne13,10,14,1947,34,085 | 1      | 13.458   | 3.902      | 0.727          | 0.158              | 0.290              | 0.205                    | 1.101              | 0.61               | 0.790           | 0.348              | 0.790                 | 0.348     | -0.0160                   | 0.00000   | 0.30               | 0.92      | 1.739        |
| 10/14/2013 19:47 0917-173, Ne13,10,14,1947,40,265 | 1      | 9.697    | 3.600      | 0.244          | 0.167              | 0.160              | 0.208                    | 0.668              | 0.65               | 0.335           | 0.333              | -0.01500              | 0.00000   | 1.0680                    | 0.807     | 1.741              | 0.807     | 1.741        |
| 10/14/2013 19:47 0917-173, Ne13,10,14,1947,46,545 | 1      | 12.256   | 3.566      | 0.531          | 0.159              | 0.531              | 0.150                    | 1.091              | 0.70               | 0.557           | 0.333              | -0.01800              | 0.00000   | 0.775                     | 0.807     | 1.884              | 0.775     | 1.884        |
| 10/14/2013 19:47 0917-173, Ne13,10,14,1947,52,605 | 1      | -1.93    | 3.587      | -0.169         | 0.192              | -0.28200           | 0.158                    | 0.701              | 0.80               | 0.317           | 0.317              | -0.01800              | 0.00000   | -1.46                     | 1.07      | -0.366             | -1.46     | 1.07         |
| 10/14/2013 19:47 0917-173, Ne13,10,14,1947,58,785 | 1      | 12.796   | 3.578      | -0.2390        | 0.215              | -0.2550            | 0.155                    | 1.045              | 0.93               | -0.0610         | 0.342              | -0.0230               | 0.00000   | -1.24                     | 1.10      | -0.301             | -1.24     | 1.10         |
| 10/14/2013 19:48 0917-173, Ne13,10,14,1948,05,005 | 1      | -1.131   | 3.599      | -0.318         | 0.195              | 0.080              | 0.144                    | 0.929              | 0.89               | 0.20            | 0.319              | -0.02400              | 0.00000   | -2.537                    | 1.07      | -0.246             | -2.537    | 1.07         |
| 10/14/2013 19:48 0917-173, Ne13,10,14,1948,11,245 | 1      | 8.720    | 3.324      | 0.238          | 0.195              | 0.4200             | 0.143                    | 0.973              | 0.86               | 0.314           | 0.314              | -0.03600              | 0.00000   | 1.29                      | 1.03      | -0.243             | 1.29      | 1.03         |
| 10/14/2013 19:48 0917-173, Ne13,10,14,1948,17,425 | 1      | -15.97   | 3.631      | -0.080         | 0.187              | -0.283             | 0.154                    | 0.639              | 1.02               | -0.048          | 0.317              | -0.03200              | 0.00000   | -3.07                     | 1.07      | -0.156             | -3.07     | 1.07         |
| 10/14/2013 19:48 0917-173, Ne13,10,14,1948,23,505 | 1      | -8.18    | 3.569      | 0.04100        | 0.186              | -0.311             | 0.144                    | 0.466              | 1.04               | -0.030          | 0.311              | -0.00700              | 0.00000   | -1.579                    | 1.01      | -0.18              | -1.579    | 1.01         |
| 10/14/2013 19:48 0917-173, Ne13,10,14,1948,29,645 | 1      | -4.355   | 3.493      | -0.143         | 0.188              | -0.1550            | 0.153                    | 0.612              | 1.08               | 0.135           | 0.310              | -0.01700              | 0.00000   | -0.58                     | 1.05      | -0.148             | -0.58     | 1.05         |
| 10/14/2013 19:48 0917-173, Ne13,10,14,1948,35,905 | 1      | -4.930   | 3.361      | 0.207          | 0.181              | -0.2400            | 0.153                    | 0.61               | 1.33               | 0.311           | 0.311              | -0.03100              | 0.00000   | -0.69                     | 1.02      | -0.064             | -0.69     | 1.02         |
| 10/14/2013 19:48 0917-173, Ne13,10,14,1948,42,075 | 1      | -7.705   | 3.704      | 0.050          | 0.194              | -0.0980            | 0.148                    | 0.901              | 1.13               | 0.14            | 0.324              | -0.02800              | 0.00000   | -4.407                    | 1.09      | -0.082             | -4.407    | 1.09         |
| 10/14/2013 19:48 0917-173, Ne13,10,14,1948,48,245 | 1      | -10.851  | 3.361      | 0.084          | 0.192              | -0.2490            | 0.151                    | 0.809              | 1.16               | 0.42            | 0.309              | -0.01700              | 0.00000   | -4.62                     | 1.03      | -0.074             | -4.62     | 1.03         |
| 10/14/2013 19:48 0917-173, Ne13,10,14,1948,54,325 | 1      | -10.415  | 3.368      | -0.154         | 0.190              | -0.1750            | 0.155                    | 1.134              | 1.18               | 0.308           | 0.308              | -0.02500              | 0.00000   | -1.258                    | 1.03      | -0.107             | -1.258    | 1.03         |
| 10/14/2013 19:49 0917-173, Ne13,10,14,1949,06,595 | 1      | -15.919  | 3.506      | -0.152         | 0.195              | -0.0120            | 0.145                    | 1.162              | 1.12               | -0.21           | 0.325              | -0.00500              | 0.00000   | -0.640                    | 1.08      | -0.128             | -0.640    | 1.08         |
| 10/14/2013 19:49 0917-173, Ne13,10,14,1949,06,775 | 1      | -5.183   | 3.431      | -0.391         | 0.180              | -0.295             | 0.154                    | 0.867              | 1.16               | -0.420          | 0.303              | -0.03400              | 0.00000   | -2.121                    | 1.00      | -0.103             | -2.121    | 1.00         |
| 10/14/2013 19:49 0917-173, Ne13,10,14,1949,12,935 | 1      | 0.197    | 3.523      | -0.136         | 0.190              | -0.17200           | 0.155                    | 1.122              | 1.30               | -0.0740         | 0.312              | -0.01800              | 0.00000   | -1.8920                   | 1.05      | -0.049             | -1.8920   | 1.05         |
| 10/14/2013 19:49 0917-173, Ne13,10,14,1949,19,205 | 1      | -10.618  | 3.267      | -0.069         | 0.195              | -0.241             | 0.147                    | 1.538              | 1.31               | 0.364           | 0.307              | -0.02700              | 0.00000   | -1.913                    | 0.96      | -0.054             | -1.913    | 0.96         |
| 10/14/2013 19:49 0917-173, Ne13,10,14,1949,25,285 | 1      | -10.695  | 3.482      | 0.043          | 0.191              | -0.154             | 0.148                    | 0.17               | 1.25               | -0.227          | 0.316              | -0.02900              | 0.00000   | -0.90                     | 1.06      | 0.099              | -0.90     | 1.06         |
| 10/14/2013 19:49 0917-173, Ne13,10,14,1949,31,435 | 1      | -2.55    | 3.245      | 0.174          | 0.178              | -0.1150            | 0.154                    | 1.355              | 1.37               | -0.367          | 0.294              | -0.03900              | 0.00000   | -1.03                     | 0.99      | 0.042              | -1.03     | 0.99         |
| 10/14/2013 19:49 0917-173, Ne13,10,14,1949,37,715 | 1      | 1.053    | 3.275      | 0.170          | 0.180              | -0.142             | 0.150                    | 1.211              | 1.44               | -0.464          | 0.307              | -0.03100              | 0.00000   | -1.349                    | 1.03      | 0.153              | -1.349    | 1.03         |
| 10/14/2013 19:49 0917-173, Ne13,10,14,1949,43,965 | 1      | -9.903   | 3.226      | -0.037         | 0.173              | -0.108             | 0.151                    | 0.722              | 1.50               | 0.377           | 0.285              | -0.01700              | 0.00000   | -1.19                     | 0.94      | 0.072              | -1.19     | 0.94         |
| 10/14/2013 19:49 0917-173, Ne13,10,14,1949,50,095 | 1      | -3.886   | 3.237      | 0.036          | 0.173              | -0.363             | 0.148                    | 0.678              | 1.54               | 0.57            | 0.286              | -0.01800              | 0.00700   | -2.84                     | 0.96      | 0.217              | -2.84     | 0.96         |
| 10/14/2013 19:49 0917-173, Ne13,10,14,1949,56,175 | 1      | -5.825   | 3.430      | -0.00400       | 0.176              | -0.0460            | 0.154                    | 1.185              | 1.656              | -0.083          | 0.294              | -0.00500              | 0.00700   | -1.27                     | 0.99      | 0.236              | -1.27     | 0.99         |
| 10/14/2013 19:50 0917-173, Ne13,10,14,1950,02,265 | 1      | -6.750   | 3.223      | 0.140          | 0.177              | -0.140             | 0.156                    | 0.56               | 1.237              | 0.285           | 0.285              | -0.02200              | 0.00000   | -0.990                    | 0.98      | 0.232              | -0.990    | 0.98         |
| 10/14/2013 19:50 0917-173, Ne13,10,14,1950,08,595 | 1      | -4.070   | 3.108      | -0.076         | 0.174              | 0.0640             | 0.143                    | 1.298              | 1.728              | 0.036           | 0.282              | -0.02200              | 0.00000   | -1.853                    | 0.96      | 0.232              | -1.853    | 0.96         |
| 10/14/2013 19:50 0917-173, Ne13,10,14,1950,14,785 | 1      | -2.85    | 3.079      | -0.004         | 0.165              | -0.1470            | 0.147                    | 1.164              | 1.746              | -0.214          | 0.269              | -0.01100              | 0.00000   | -1.652                    | 0.92      | 0.25               | -1.652    | 0.92         |
| 10/14/2013 19:50 0917-173, Ne13,10,14,1950,20,855 | 1      | -0.885   | 2.946      | 0.200          | 0.175              | 0.08800            | 0.154                    | 0.935              | 1.784              | 0.441           | 0.277              | -0.02000              | 0.00700   | -5.031                    | 0.88      | 0.223              | -5.031    | 0.88         |
| 10/14/2013 19:50 0917-173, Ne13,10,14,1950,26,915 | 1      | -4.939   | 3.18       | -0.114         | 0.181              | -0.114             | 0.151                    | 1.041              | 1.709              | 0.295           | 0.295              | -0.02100              | 0.00000   | -0.84                     | 0.99      | 0.299              | -0.84     | 0.99         |
| 10/14/2013 19:50 0917-173, Ne13,10,14,1950,32,235 | 1      | -1.59    | 3.160      | -0.476         | 0.165              | -0.250             | 0.147                    | 0.521              | 1.698              | -0.3460         | 0.276              | -0.02100              | 0.00000   | -1.075                    | 0.93      | 0.196              | -1.075    | 0.93         |
| 10/14/2013 19:50 0917-173, Ne13,10,14,1950,38,435 | 1      | -9.258   | 3.039      | 0.148          | 0.187              | 0.136              | 0.145                    | 1.444              | 1.727              | 0.150           | 0.297              | -0.03                 | 0.00000   | -1.747                    | 0.98      | 0.228              | -1.747    | 0.98         |
| 10/14/2013 19:50 0917-173, Ne13,10,14,1950,44,515 | 1      | -0.0160  | 3.163      | -0.327         | 0.163              | -0.327             | 0.150                    | 0.447              | 1.716              | 0.306           | 0.306              | -0.02700              | 0.00000   | -0.684                    | 0.98      | 0.344              | -0.684    | 0.98         |
| 10/14/2013 19:50 0917-173, Ne13,10,14,1950,51,825 | 1      | -3.31    | 3.466      | -0.099         | 0.178              | 0.1450             | 0.157                    | 1.013              | 1.692              | -0.0400         | 0.299              | -0.00800              | 0.00000   | -1.099                    | 1.00      | 0.277              | -1.099    | 1.00         |
| 10/14/2013 19:50 0917-173, Ne13,10,14,1950,58,005 | 1      | -1.118   | 2.908      | -0.0130        | 0.179              | -0.258             | 0.157                    | 0.944              | 1.705              | -0.06           | 0.279              | -0.02                 | 0.00000   | -1.295                    | 0.94      | 0.219              | -1.295    | 0.94         |
| 10/14/2013 19:51 0917-173, Ne13,10,14,1951,04,185 | 1      | -5.076   | 3.245      | 0.2180         | 0.173              | -0.1090            | 0.146                    | 0.825              | 1.715              | -0.028          | 0.288              | -0.02700              | 0.00000   | -2.61                     | 0.99      | 0.227              | -2.61     | 0.99         |
| 10/14/2013 19:51 0917-173, Ne13,10,14,1951,10,375 | 1      | -7.40    | 3.260      | 0.181          | 0.190              | -0.130             | 0.158                    | 0.720              | 1.799              | 0.298           | 0.298              | -0.02200              | 0.00000   | -0.88                     | 0.98      | 0.282              | -0.88     | 0.98         |
| 10/14/2013 19:51 0917-173, Ne13,10,14,1951,16,615 | 1      | -3.587   | 3.105      | 0.176          | 0.171              | 0.0240             | 0.146                    | 1.335              | 1.746              | -0.437          | 0.280              | -0.00700              | 0.00700   | -0.063                    | 0.98      | 0.311              | -0.063    | 0.98         |
| 10/14/2013 19:51 0917-173, Ne13,10,14,1951,22,685 | 1      | -8.753   | 3.169      | -0.0650        | 0.182              | -0.237             | 0.151                    | 1.315              | 1.725              | 0.116           | 0.288              | -0.02900              | 0.00000   | -1.05                     | 1.01      | 0.282              | -1.05     | 1.01         |
| 10/14/2013 19:51 0917-173, Ne13,10,14,1951,28,855 | 1      | -7.172   | 3.184      | -0.157         | 0.177              | -0.157             | 0.152                    | 1.024              | 1.727              | -0.285          | 0.273              | -0.01200              | 0.00000   | -0.95                     | 0.98      | 0.273              | -0.95     | 0.98         |
| 10/14/2013 19:51 0917-173, Ne13,10,14,1951,35,135 | 1      | -9.754   | 3.062      | -0.00000       | 0.163              | -0.113             | 0.156                    | 0.677              | 1.731              | -0.213          | 0.288              | -0.01400              | 0.00000   | -0.28                     | 0.90      | 0.119              | -0.28     | 0.90         |
| 10/14/2013 19:51 0917-173, Ne13,10,14,1951,41,325 | 1      | -9.091   | 3.207      | 0.142          | 0.169              | -0.1640            | 0.146                    | 1.043              | 1.794              | -0.06           | 0.283              | -0.02200              | 0.00000   | -1.60                     | 0.94      | 0.276              | -1.60     | 0.94         |
| 10/14/2013 19:51 0917-173, Ne13,10,14,1951,47,515 | 1      | -9.044   | 3.362      | 0.1600         | 0.170              | -0.069             | 0.153                    | 0.497              | 1.681              | 0.12            | 0.288              | -0.00200              | 0.00700   | -2.011                    | 0.98      | 0.311              | -2.011    | 0.98         |
| 10/14/2013 19:51 0917-173, Ne13,10,14,1951,53,595 | 1      | -8.199   | 3.18       | -0.164         | 0.191              | -0.164             | 0.151                    | 0.640              | 1.731              | -0.42           | 0.273              | -0.02200              | 0.00000   | -0.67                     | 0.95      | 0.282              | -0.67     | 0.95         |
| 10/14/2013 19:51 0917-173, Ne13,10,14,1951,59,795 | 1      | -2.896   | 3.173      | -0.125         | 0.175              | 0.006              | 0.151                    | 0.425              | 1.802              | -0.4180         | 0.285              | -0.01700              | 0.00000   | -0.90                     | 0.96      | 0.301              | -0.90     | 0.96         |
| 10/14/2013 19:52 0917-173, Ne13,10,14,1952,05,975 | 1      | -11.031  | 3.252      | 0.409          | 0.170              | 0.144              | 0.150                    | 0.761              | 1.803              | -0.214          | 0.284              | -0.03400              | 0.00700   | -1.09                     | 0.93      | 0.258              | -1.09     | 0.93         |
| 10/14/2013 19:52 0917-173, Ne13,10,14,1952,12,155 | 1      | 0.036    | 3.129      | -0.236         | 0.170              | -0.236             | 0.146                    | 0.720              | 1.803              | -0.216          | 0.284              | -0.03400              | 0.00700   | -1.17                     | 0.95      | 0.286              | -1.17     | 0.95         |
| 10/14/2013 19:52 0917-173, Ne13,10,14,1952,18,405 | 1      | -12.77   | 3.015      | -0.1600        | 0.172              | -0.201             | 0.144                    | 0.913              | 1.837              | 0.335           | 0.283              | -0.01500              | 0.00000   | -1.81                     | 0.97      | 0.311              | -1.81     | 0.97         |
| 10/14/2013 19:52 0917-173, Ne13,10,14,1952,24,465 | 1      | -2.931   | 2.954      | 0.222          | 0.174              | -0.120             | 0.158                    | 0.870              | 1.829              | 0.245           | 0.280              | -0.01800              | 0.00000   | -2.01                     | 0.92      | 0.321              | -2.01     | 0.92         |
| 10/14/2013 19:52 0917-173, Ne13,10,14,1952,30,645 | 1      | 8.820    | 3.236      | 0.163          | 0.171              | -0.0880            | 0.147                    | 1.142              | 1.727              | -0.285          | 0.286              | -0.01800              | 0.00000   | -0.75                     | 0.97      | 0.327              | -0.75     | 0.97         |
| 10/14/2013 19:52 0917-173, Ne13,10,14,1952,36,905 | 1      | -2.016   | 3.129      | -0.169         | 0.170              | -0.169             | 0.156                    | 0.716              | 1.856              | 0.271           | 0.286              | -0.02600              | 0.00000   | -0.614                    | 0.94      | 0.284              | -0.614    | 0.94         |
| 10/14/2013 19:52 0917-173, Ne13,10,14,1952,43,035 | 1      | -1.633   | 2.971      | 0.163          | 0.171              | -0.02200           | 0.150                    |                    |                    |                 |                    |                       |           |                           |           |                    |           |              |

| Location   | Disc.  | #                                | Start/Stop | Instrument | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                     |           |              |
|------------|--------|----------------------------------|------------|------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|---------------------|-----------|--------------|
| Date       | Method | Filename                         | OF         | Acroline   | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur Hexafluoride (ppm) | SEC (ppm) | acetalddehyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/15/2013 | 1016   | 0917-173, Ne13_10_15_1016_23_584 | 1          | 0.136      | 0.046              | 0.017              | 0.046                    | 0.017              | 0.046              | 0.017           | 0.046              | 0.017                 | 0.046     | 0.017                     | 0.046     | 0.017               | 0.046     | 0.017        |
| 10/15/2013 | 1017   | 0917-173, Ne13_10_15_1017_23_324 | 1          | 0.7110     | 0.901              | -0.0170            | 0.055                    | 0.0157             | 0.040              | 0.0320          | 0.0730             | 0.134                 | 0.088     | -0.0060                   | 0.00200   | -0.873              | 0.284     | 0.383        |
| 10/15/2013 | 1018   | 0917-173, Ne13_10_15_1018_24_144 | 1          | 0.999      | 1.062              | 0.0460             | 0.064                    | 2.26               | 0.0650             | 0.299           | 1.141              | -0.462                | 0.103     | 0.0000                    | 0.00000   | -0.395              | 0.336     | 3.909        |
| 10/15/2013 | 1019   | 0917-173, Ne13_10_15_1019_24_844 | 1          | 1.193      | 1.225              | 0.020              | 0.0670                   | 3.05               | 0.0910             | 0.402           | 1.688              | -0.773                | 0.117     | -0.0040                   | 0.00300   | -0.720              | 0.351     | 5.806        |
| 10/15/2013 | 1020   | 0917-173, Ne13_10_15_1020_25_164 | 1          | 1.6790     | 1.063              | 0.029              | 0.068                    | 3.11               | 0.0910             | 0.201           | 1.720              | -0.8940               | 0.114     | -0.0070                   | 0.00300   | 0.146               | 0.348     | 6.161        |
| 10/15/2013 | 1021   | 0917-173, Ne13_10_15_1021_25_404 | 1          | -0.4620    | 1.199              | 0.0780             | 0.067                    | 3.16               | 0.0890             | 0.469           | 1.718              | -0.761                | 0.118     | -0.00300                  | 0.00300   | -0.51               | 0.362     | 6.674        |
| 10/15/2013 | 1022   | 0917-173, Ne13_10_15_1022_26_154 | 1          | -1.127     | 1.092              | -0.008             | 0.070                    | 3.04               | 0.0880             | 0.493           | 1.720              | -0.903                | 0.118     | -0.00200                  | 0.00300   | -0.56               | 0.342     | 5.824        |
| 10/15/2013 | 1023   | 0917-173, Ne13_10_15_1023_26_364 | 1          | 1.475      | 1.071              | 0.052              | 0.065                    | 3.12               | 0.0900             | 0.436           | 1.722              | -0.650                | 0.112     | -0.00200                  | 0.00300   | -0.44               | 0.332     | 5.944        |
| 10/15/2013 | 1024   | 0917-173, Ne13_10_15_1024_27_684 | 1          | -0.6640    | 1.166              | 0.195              | 0.065                    | 3.10               | 0.0910             | 0.366           | 1.717              | -0.741                | 0.113     | -0.00200                  | 0.00300   | -1.10               | 0.342     | 5.739        |
| 10/15/2013 | 1025   | 0917-173, Ne13_10_15_1025_28_404 | 1          | 0.031      | 1.154              | 0.102              | 0.071                    | 2.97               | 0.0900             | 0.456           | 1.718              | -0.660                | 0.120     | -0.00800                  | 0.00300   | 0.15                | 0.358     | 5.329        |
| 10/15/2013 | 1026   | 0917-173, Ne13_10_15_1026_29_224 | 1          | 0.624      | 1.221              | -0.047             | 0.064                    | 2.79               | 0.0970             | 0.389           | 1.712              | -0.545                | 0.111     | -0.00400                  | 0.00300   | -0.578              | 0.344     | 5.098        |
| 10/15/2013 | 1027   | 0917-173, Ne13_10_15_1027_30_164 | 1          | 0.156      | 1.079              | 0.067              | 0.064                    | 2.67               | 0.0830             | 0.429           | 1.705              | -0.683                | 0.109     | -0.00300                  | 0.00300   | -0.65               | 0.317     | 4.943        |
| 10/15/2013 | 1028   | 0917-173, Ne13_10_15_1028_30_805 | 1          | -0.0030    | 1.154              | 0.1370             | 0.069                    | 2.76               | 0.0880             | 0.418           | 1.699              | -0.671                | 0.113     | -0.00200                  | 0.00300   | -0.277              | 0.367     | 4.988        |
| 10/15/2013 | 1029   | 0917-173, Ne13_10_15_1029_31_375 | 1          | -0.055     | 1.175              | 0.1420             | 0.068                    | 2.84               | 0.0880             | 0.439           | 1.710              | -0.718                | 0.115     | -0.00700                  | 0.00300   | -0.756              | 0.352     | 3.373        |
| 10/15/2013 | 1030   | 0917-173, Ne13_10_15_1030_32_305 | 1          | -1.157     | 1.150              | 0.123              | 0.073                    | 2.95               | 0.0850             | 0.469           | 1.713              | -0.677                | 0.121     | -0.00400                  | 0.00300   | -0.577              | 0.367     | 5.405        |
| 10/15/2013 | 1031   | 0917-173, Ne13_10_15_1031_32_365 | 1          | -1.519     | 1.084              | 0.125              | 0.067                    | 3.03               | 0.0880             | 0.287           | 1.714              | -0.707                | 0.114     | -0.00300                  | 0.00300   | -0.35               | 0.351     | 5.576        |
| 10/15/2013 | 1032   | 0917-173, Ne13_10_15_1032_33_755 | 1          | 0.692      | 1.087              | 0.0850             | 0.063                    | 3.11               | 0.0870             | 0.352           | 1.715              | -0.704                | 0.111     | -0.00900                  | 0.00300   | -0.45               | 0.333     | 5.769        |
| 10/15/2013 | 1033   | 0917-173, Ne13_10_15_1033_34_495 | 1          | 0.166      | 1.097              | 0.043              | 0.073                    | 3.27               | 0.0910             | 0.467           | 1.730              | -0.669                | 0.122     | -0.00200                  | 0.00300   | -0.47               | 0.352     | 6.169        |
| 10/15/2013 | 1034   | 0917-173, Ne13_10_15_1034_35_205 | 1          | -1.631     | 1.143              | 0.0940             | 0.070                    | 3.38               | 0.0920             | 0.279           | 1.736              | -0.763                | 0.119     | -0.00200                  | 0.00300   | -0.08               | 0.350     | 6.449        |
| 10/15/2013 | 1035   | 0917-173, Ne13_10_15_1035_35_975 | 1          | 0.110      | 1.088              | -0.048             | 0.072                    | 3.38               | 0.0910             | 0.415           | 1.748              | -0.819                | 0.119     | -0.00500                  | 0.00300   | 0.22                | 0.340     | 6.27         |
| 10/15/2013 | 1036   | 0917-173, Ne13_10_15_1036_36_815 | 1          | 0.047      | 1.116              | 0.0990             | 0.065                    | 3.40               | 0.0930             | 0.353           | 1.743              | -0.8580               | 0.114     | -0.00500                  | 0.00300   | -0.16               | 0.340     | 6.296        |
| 10/15/2013 | 1037   | 0917-173, Ne13_10_15_1037_37_575 | 1          | 1.3108     | 1.199              | 0.013              | 0.067                    | 3.13               | 0.0900             | 0.438           | 1.735              | -0.513                | 0.116     | -0.00300                  | 0.00300   | -1.360              | 0.356     | 5.643        |
| 10/15/2013 | 1038   | 0917-173, Ne13_10_15_1038_38_285 | 1          | 0.448      | 1.142              | 0.0380             | 0.068                    | 3.19               | 0.0890             | 0.545           | 1.735              | -0.802                | 0.115     | -0.00500                  | 0.00300   | 0.69                | 0.359     | 5.811        |
| 10/15/2013 | 1039   | 0917-173, Ne13_10_15_1039_39_115 | 1          | -0.8700    | 1.161              | 0.042              | 0.066                    | 3.32               | 0.0930             | 0.524           | 1.739              | -0.864                | 0.119     | -0.00100                  | 0.00300   | -0.35               | 0.350     | 6.198        |
| 10/15/2013 | 1040   | 0917-173, Ne13_10_15_1040_39_786 | 1          | 0.465      | 1.205              | 0.093              | 0.068                    | 3.26               | 0.0880             | 0.421           | 1.741              | -0.796                | 0.119     | -0.00700                  | 0.00300   | -0.85               | 0.362     | 1.885        |
| 10/15/2013 | 1041   | 0917-173, Ne13_10_15_1041_40_576 | 1          | -0.295     | 1.145              | 0.052              | 0.065                    | 2.45               | 0.0900             | 0.503           | 1.721              | -0.619                | 0.120     | -0.00200                  | 0.00300   | -0.10               | 0.366     | 5.599        |
| 10/15/2013 | 1042   | 0917-173, Ne13_10_15_1042_41_326 | 1          | 0.7580     | 1.197              | 0.034              | 0.068                    | 2.83               | 0.0840             | 0.411           | 1.732              | -0.664                | 0.116     | -0.00000                  | 0.00300   | -0.51               | 0.353     | 5.424        |
| 10/15/2013 | 1043   | 0917-173, Ne13_10_15_1043_42_126 | 1          | 0.4420     | 1.081              | 0.080              | 0.070                    | 2.76               | 0.0840             | 0.569           | 1.723              | -0.7660               | 0.115     | -0.00200                  | 0.00300   | -0.36               | 0.364     | 5.093        |
| 10/15/2013 | 1044   | 0917-173, Ne13_10_15_1044_42_866 | 1          | 1.251      | 1.086              | 0.020              | 0.066                    | 2.60               | 0.0820             | 0.508           | 1.715              | -0.641                | 0.110     | -0.00400                  | 0.00200   | -0.908              | 0.331     | 4.931        |
| 10/15/2013 | 1045   | 0917-173, Ne13_10_15_1045_43_686 | 1          | -3.156     | 1.118              | 0.016              | 0.068                    | 2.68               | 0.0880             | 0.519           | 1.721              | -0.712                | 0.112     | -0.00400                  | 0.00300   | -0.587              | 0.348     | 4.48         |
| 10/15/2013 | 1046   | 0917-173, Ne13_10_15_1046_44_456 | 1          | -0.137     | 1.063              | 0.062              | 0.069                    | 2.64               | 0.0840             | 0.579           | 1.690              | -0.570                | 0.115     | -0.00400                  | 0.00300   | -0.604              | 0.358     | 4.902        |
| 10/15/2013 | 1047   | 0917-173, Ne13_10_15_1047_45_156 | 1          | 0.841      | 1.135              | 0.01               | 0.066                    | 2.51               | 0.0810             | 0.614           | 1.695              | -0.640                | 0.111     | -0.00600                  | 0.00200   | -0.68               | 0.344     | 4.565        |
| 10/15/2013 | 1048   | 0917-173, Ne13_10_15_1048_45_966 | 1          | 0.727      | 1.117              | -0.012             | 0.067                    | 2.49               | 0.0810             | 0.700           | 1.691              | -0.712                | 0.114     | -0.00400                  | 0.00300   | -0.70               | 0.347     | 4.893        |
| 10/15/2013 | 1049   | 0917-173, Ne13_10_15_1049_46_776 | 1          | -0.020     | 1.069              | 0.050              | 0.063                    | 2.29               | 0.0810             | 0.770           | 1.691              | -0.669                | 0.109     | -0.00200                  | 0.00300   | -0.65               | 0.327     | 5.213        |
| 10/15/2013 | 1050   | 0917-173, Ne13_10_15_1050_47_546 | 1          | -1.4400    | 1.033              | -0.0100            | 0.063                    | 2.34               | 0.0840             | 0.360           | 1.676              | -0.757                | 0.109     | -0.00700                  | 0.00200   | -0.55               | 0.330     | 5.602        |
| 10/15/2013 | 1051   | 0917-173, Ne13_10_15_1051_48_286 | 1          | -0.378     | 1.091              | 0.088              | 0.069                    | 2.36               | 0.0790             | 0.523           | 1.695              | -0.801                | 0.116     | -0.00500                  | 0.00300   | -0.29               | 0.341     | 6.084        |
| 10/15/2013 | 1052   | 0917-173, Ne13_10_15_1052_48_107 | 1          | -0.158     | 1.143              | 0.058              | 0.065                    | 2.40               | 0.0780             | 0.503           | 1.704              | -0.787                | 0.114     | -0.00300                  | 0.00300   | -0.39               | 0.47      | 5.957        |
| 10/15/2013 | 1053   | 0917-173, Ne13_10_15_1053_49_787 | 1          | 1.177      | 1.088              | -0.028             | 0.065                    | 2.08               | 0.0810             | 0.488           | 1.673              | -0.785                | 0.111     | -0.00700                  | 0.00200   | -0.51               | 0.329     | 6.501        |
| 10/15/2013 | 1054   | 0917-173, Ne13_10_15_1054_50_567 | 1          | -2.184     | 1.122              | -0.025             | 0.067                    | 2.37               | 0.0830             | 0.582           | 1.695              | -0.891                | 0.117     | -0.00300                  | 0.00300   | -0.15               | 0.348     | 7.583        |
| 10/15/2013 | 1055   | 0917-173, Ne13_10_15_1055_51_347 | 1          | 0.681      | 1.227              | 0.068              | 0.064                    | 2.46               | 0.0820             | 0.523           | 1.704              | -1.126                | 0.125     | -0.00300                  | 0.00300   | -0.37               | 0.386     | 6.83         |
| 10/15/2013 | 1056   | 0917-173, Ne13_10_15_1056_51_137 | 1          | 1.591      | 1.134              | 0.067              | 0.072                    | 2.32               | 0.0820             | 0.520           | 1.713              | -0.975                | 0.121     | -0.00600                  | 0.00300   | -0.75               | 0.359     | 7.847        |
| 10/15/2013 | 1057   | 0917-173, Ne13_10_15_1057_52_947 | 1          | 0.8880     | 1.190              | 0.0470             | 0.070                    | 2.28               | 0.0850             | 0.557           | 1.705              | -1.097                | 0.125     | -0.00500                  | 0.00300   | -0.19               | 0.378     | 8.385        |
| 10/15/2013 | 1058   | 0917-173, Ne13_10_15_1058_53_697 | 1          | -1.611     | 1.179              | 0.0860             | 0.068                    | 2.51               | 0.0830             | 0.508           | 1.714              | -1.057                | 0.123     | -0.00900                  | 0.00300   | -0.43               | 0.354     | 8.651        |
| 10/15/2013 | 1059   | 0917-173, Ne13_10_15_1059_54_417 | 1          | 0.370      | 1.204              | 0.067              | 0.070                    | 2.44               | 0.0820             | 0.725           | 1.718              | -1.126                | 0.128     | -0.00400                  | 0.00300   | -0.74               | 0.344     | 8.361        |
| 10/15/2013 | 1100   | 0917-173, Ne13_10_15_1100_55_187 | 1          | 0.740      | 1.126              | -0.153             | 0.063                    | 2.65               | 0.0860             | 0.527           | 1.735              | -1.1500               | 0.114     | -0.00500                  | 0.00300   | -0.27               | 0.343     | 7.994        |
| 10/15/2013 | 1101   | 0917-173, Ne13_10_15_1101_55_987 | 1          | 0.843      | 1.090              | 0.0210             | 0.060                    | 2.70               | 0.0850             | 0.592           | 1.733              | -0.952                | 0.115     | -0.00000                  | 0.00300   | -0.54               | 0.322     | 7.798        |
| 10/15/2013 | 1102   | 0917-173, Ne13_10_15_1102_56_697 | 1          | -1.230     | 1.129              | -0.230             | 0.060                    | 2.60               | 0.0830             | 0.569           | 1.718              | -0.977                | 0.116     | -0.00300                  | 0.00300   | -0.90               | 0.344     | 8.08         |
| 10/15/2013 | 1103   | 0917-173, Ne13_10_15_1103_57_478 | 1          | 2.850      | 1.123              | 0.053              | 0.070                    | 2.85               | 0.0840             | 0.595           | 1.731              | -0.980                | 0.121     | -0.00200                  | 0.00300   | -0.63               | 0.344     | 7.244        |
| 10/15/2013 | 1104   | 0917-173, Ne13_10_15_1104_58_198 | 1          | 2.745      | 1.132              | -0.050             | 0.070                    | 3.00               | 0.0880             | 0.396           | 1.746              | -0.9470               | 0.123     | -0.00400                  | 0.00200   | -0.15               | 0.351     | 7.322        |
| 10/15/2013 | 1105   | 0917-173, Ne13_10_15_1105_59_018 | 1          | 0.540      | 1.211              | 0.0150             | 0.068                    | 2.68               | 0.0860             | 0.402           | 1.739              | -1.017                | 0.123     | -0.00200                  | 0.00300   | -0.36               | 0.361     | 6.759        |
| 10/15/2013 | 1106   | 0917-173, Ne13_10_15_1106_59_838 | 1          | -0.6010    | 1.081              | 0.065              | 0.068                    | 2.45               | 0.0840             | 0.503           | 1.721              | -0.808                | 0.120     | -0.00300                  | 0.00300   | -0.23               | 0.346     | 7.133        |
| 10/15/2013 | 1108   | 0917-173, Ne13_10_15_1108_00_548 | 1          | 2.124      | 1.164              | -0.0090            | 0.064                    | 2.31               | 0.0810             | 0.574           | 1.709              | -0.658                | 0.112     | -0.00400                  | 0.00200   | -0.70               | 0.344     | 5.282        |
| 10/15/2013 | 1109   | 0917-173, Ne13_10_15_1109_01_338 | 1          | -0.388     | 1.157              | 0.0140             | 0.063                    | 2.24               | 0.0810             | 0.512           | 1.692              | -0.727                | 0.109     | -0.00400                  | 0.00300   | -0.69               | 0.341     | 4.798        |
| 10/15/2013 | 1110   | 0917-173, Ne13_10_15_1110_02_068 | 1          | -0.560     | 1.213              | 0.0270             | 0.070                    | 2.17               | 0.0800             | 0.621           | 1.703              | -0.588                | 0.115     | -0.00600                  | 0.00200   | -0.695              |           |              |

| Location                  | Disc.                  | #        | Start/Stop | Instrument | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                    |           |              |
|---------------------------|------------------------|----------|------------|------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|--------------------|-----------|--------------|
| Date                      | Method                 | Filename | DF         | Acroline   | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur Hexafluoride (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/15/2013 12:54 0917-173 | Ne13_10_15_1254_31_005 |          | 1          | 0.071      | 0.238              | 0.071              | 0.0000                   | 0.0000             | 0.0000             | 0.0000          | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 12:55 0917-173 | Ne13_10_15_1255_31_762 |          | 1          | 1.001      | 1.072              | 0.089              | 0.062                    | 0.0910             | 0.0600             | 0.4870          | 1.303              | -0.122                | 0.101     | -0.0080                   | 0.0000    | -0.7100            | 0.332     | 1.971        |
| 10/15/2013 13:11 0917-173 | Ne13_10_15_1311_08_205 |          | 1          | 1.0        | 1.0                | -0.373             | 0.086                    | -0.41              | 1.56               | -0.0920         | 0.1060             | -0.115                | 0.136     | -0.005                    | 0.628     | -0.1340            | 0.443     | -1.958       |
| 10/15/2013 13:11 0917-173 | Ne13_10_15_1311_26_705 |          | 1          | -1.3       | 1.5                | 0.0100             | 0.084                    | -0.36              | 1.60               | 0.115           | 0.1090             | 0.109                 | 0.118     | 0.058                     | 0.442     | -0.385             | 0.446     | -2.002       |
| 10/15/2013 13:11 0917-173 | Ne13_10_15_1311_46_305 |          | 1          | -1.1       | 1.6                | -0.137             | 0.087                    | -0.43              | 1.62               | -0.185          | 0.1030             | -0.010                | 0.144     | -0.075                    | 0.051     | -0.481             | 0.421     | -2.016       |
| 10/15/2013 13:12 0917-173 | Ne13_10_15_1312_08_885 |          | 1          | 0.2        | 1.5                | -0.301             | 0.082                    | -0.45              | 1.63               | -0.0920         | 0.1020             | 0.054                 | 0.135     | 0.053                     | 0.655     | -0.395             | 0.540     | -2.051       |
| 10/15/2013 13:12 0917-173 | Ne13_10_15_1312_22_355 |          | 1          | -1.3       | 1.5                | -0.203             | 0.085                    | -0.43              | 1.65               | -0.2550         | 0.1070             | -0.184                | 0.137     | 0.055                     | 0.656     | 0.80               | 0.459     | -2.066       |
| 10/15/2013 13:12 0917-173 | Ne13_10_15_1312_41_005 |          | 1          | 1.5        | 1.8                | -0.0860            | 0.082                    | -0.22              | 1.65               | -0.1010         | 0.1000             | -0.1600               | 0.134     | 0.055                     | 0.072     | 0.550              | 0.445     | -2.07        |
| 10/15/2013 13:12 0917-173 | Ne13_10_15_1312_59_495 |          | 1          | 1.6        | 1.5                | -0.0350            | 0.083                    | -0.44              | 1.65               | -0.1040         | 0.1000             | -0.037                | 0.136     | 0.060                     | 0.657     | -0.5140            | 0.453     | -2.044       |
| 10/15/2013 13:13 0917-173 | Ne13_10_15_1313_17_965 |          | 1          | 2.2        | 1.5                | 0.037              | 0.081                    | -0.48              | 1.65               | -0.0880         | 0.1100             | -0.050                | 0.134     | 0.066                     | 0.654     | -0.528             | 0.447     | -2.075       |
| 10/15/2013 13:13 0917-173 | Ne13_10_15_1313_36_575 |          | 1          | -2.9       | 1.4                | -0.165             | 0.088                    | -0.47              | 1.64               | -0.1380         | 0.1040             | 0.006                 | 0.137     | 0.062                     | 0.657     | 0.2630             | 0.438     | -2.081       |
| 10/15/2013 13:13 0917-173 | Ne13_10_15_1313_56_075 |          | 1          | 1.9        | 1.7                | 0.180              | 0.086                    | 0.49               | 1.64               | 0.1930          | 0.1030             | 0.176                 | 0.138     | 0.072                     | 0.652     | -1.675             | 0.455     | -2.076       |
| 10/15/2013 13:14 0917-173 | Ne13_10_15_1314_13_675 |          | 1          | 3.4        | 1.6                | 0.032              | 0.081                    | -0.47              | 1.64               | -0.0900         | 0.1170             | -0.1970               | 0.130     | 0.076                     | 0.655     | -0.056             | 0.450     | -2.068       |
| 10/15/2013 13:14 0917-173 | Ne13_10_15_1314_32_115 |          | 1          | -1.0       | 1.4                | 0.231              | 0.085                    | -0.62              | 1.65               | -0.2160         | 0.1090             | -0.033                | 0.134     | 0.058                     | 0.655     | -0.743             | 0.449     | -2.055       |
| 10/15/2013 13:14 0917-173 | Ne13_10_15_1314_56_625 |          | 1          | 1.0        | 1.6                | -0.080             | 0.079                    | 0.59               | 1.64               | -0.0990         | 0.1160             | -0.258                | 0.135     | 0.062                     | 0.654     | 0.08               | 0.321     | -2.048       |
| 10/15/2013 13:33 0917-173 | Ne13_10_15_1333_17_139 |          | -0.072     | 1.124      | -0.027             | 0.086              | 1.070                    | 0.0860             | 0.4160             | 1.792           | 2.604              | 0.230                 | -0.0700   | 0.0000                    | -0.40     | 0.367              | 32.501    |              |
| 10/15/2013 13:34 0917-173 | Ne13_10_15_1334_17_799 |          | 1          | 1.390      | 1.189              | -0.060             | 0.082                    | 1.084              | 0.0880             | 0.4930          | 1.790              | -2.462                | 0.221     | -0.0600                   | 0.0000    | -0.49              | 0.354     | 32.55        |
| 10/15/2013 13:35 0917-173 | Ne13_10_15_1335_18_469 |          | 1          | 0.256      | 1.215              | -0.027             | 0.078                    | 1.052              | 0.0880             | 0.5020          | 1.776              | -2.441                | 0.226     | -0.0030                   | 0.0000    | -0.84              | 0.346     | 32.108       |
| 10/15/2013 13:36 0917-173 | Ne13_10_15_1336_19_369 |          | 1          | 1.881      | 1.159              | 0.015              | 0.082                    | 1.055              | 0.0900             | 0.393           | 1.766              | 2.637                 | 0.238     | -0.0080                   | 0.0000    | -0.64              | 0.363     | 34.171       |
| 10/15/2013 13:37 0917-173 | Ne13_10_15_1337_20_129 |          | 1          | -0.348     | 1.203              | -0.089             | 0.083                    | 1.000              | 0.0880             | 0.417           | 1.770              | -2.717                | 0.239     | -0.0010                   | 0.0000    | -0.35              | 0.358     | 34.193       |
| 10/15/2013 13:38 0917-173 | Ne13_10_15_1338_20_929 |          | 1          | 0.073      | 1.118              | -0.337             | 0.095                    | 0.356              | 0.0490             | 0.3380          | 0.792              | -3.674                | 0.192     | 0.0                       | 0.00200   | -1.47              | 0.400     | 19.078       |
| 10/15/2013 13:39 0917-173 | Ne13_10_15_1339_21_689 |          | 1          | -0.263     | 1.010              | -0.557             | 0.183                    | -0.0510            | 0.0700             | -0.0070         | 0.1520             | -4.41                 | 0.192     | -0.01                     | 0.00200   | -1.81              | 0.429     | 12.558       |
| 10/15/2013 13:40 0917-173 | Ne13_10_15_1340_22_460 |          | 1          | 0.073      | 0.997              | -0.672             | 0.106                    | -0.0840            | 0.0450             | 0.0290          | 0.1060             | -4.36                 | 0.189     | -0.0080                   | 0.0000    | -1.97              | 0.448     | 12.215       |
| 10/15/2013 13:41 0917-173 | Ne13_10_15_1341_23_230 |          | 1          | -0.244     | 1.036              | -0.675             | 0.116                    | -0.0780            | 0.0400             | 0.0580          | 0.0990             | -4.39                 | 0.196     | -0.0500                   | 0.00200   | -1.59              | 0.457     | 12.134       |
| 10/15/2013 13:42 0917-173 | Ne13_10_15_1342_24_980 |          | 1          | -0.547     | 0.996              | -0.6160            | 0.112                    | -0.0760            | 0.0450             | -0.113          | 0.0960             | -4.44                 | 0.193     | -0.0040                   | 0.0000    | -0.75              | 0.442     | 12.061       |
| 10/15/2013 13:43 0917-173 | Ne13_10_15_1343_25_780 |          | 1          | 0.008      | 1.000              | -0.121             | 0.088                    | -0.0400            | 0.0550             | 0.1250          | 0.150              | -0.185                | 0.215     | -0.0050                   | 0.0000    | -0.95              | 0.428     | 12.599       |
| 10/15/2013 13:44 0917-173 | Ne13_10_15_1344_25_530 |          | 1          | 2.328      | 1.101              | -0.129             | 0.080                    | 0.814              | 0.0730             | 0.455           | 1.561              | -2.874                | 0.210     | -0.0090                   | 0.0000    | -1.16              | 0.337     | 29.127       |
| 10/15/2013 13:45 0917-173 | Ne13_10_15_1345_26_340 |          | 1          | 0.944      | 1.203              | -0.025             | 0.085                    | 1.000              | 0.0860             | 0.6040          | 1.778              | -2.78                 | 0.245     | -0.0070                   | 0.0000    | -0.39              | 0.391     | 34.988       |
| 10/15/2013 13:46 0917-173 | Ne13_10_15_1346_27_110 |          | 1          | -0.607     | 1.169              | -0.015             | 0.082                    | 0.952              | 0.0850             | 0.5470          | 1.756              | -2.73                 | 0.249     | -0.0030                   | 0.0000    | -0.70              | 0.351     | 36.491       |
| 10/15/2013 13:47 0917-173 | Ne13_10_15_1347_27_850 |          | 1          | 1.474      | 1.172              | -0.017             | 0.081                    | 1.041              | 0.0860             | 0.5710          | 1.745              | -2.63                 | 0.248     | -0.001                    | 0.0000    | -0.63              | 0.358     | 36.937       |
| 10/15/2013 13:48 0917-173 | Ne13_10_15_1348_28_550 |          | 1          | 2.428      | 1.033              | -0.056             | 0.078                    | 0.907              | 0.0770             | 0.4050          | 1.559              | -2.52                 | 0.237     | -0.0500                   | 0.0000    | -0.90              | 0.321     | 39.12        |
| 10/15/2013 13:49 0917-173 | Ne13_10_15_1349_29_260 |          | 1          | 2.097      | 1.141              | -0.058             | 0.080                    | 0.935              | 0.0790             | 0.5150          | 1.561              | -2.855                | 0.245     | -0.0010                   | 0.0000    | -0.21              | 0.353     | 40.738       |
| 10/15/2013 13:50 0917-173 | Ne13_10_15_1350_30_070 |          | 1          | 1.138      | 1.034              | -0.015             | 0.079                    | 0.954              | 0.0800             | 0.5050          | 1.575              | -2.563                | 0.231     | -0.0010                   | 0.0000    | -0.52              | 0.327     | 38.158       |
| 10/15/2013 13:51 0917-173 | Ne13_10_15_1351_30_870 |          | 1          | 0.801      | 1.055              | 0.015              | 0.078                    | 0.995              | 0.0780             | 0.3600          | 1.566              | -2.45                 | 0.231     | -0.0000                   | 0.0000    | -0.19              | 0.335     | 37.944       |
| 10/15/2013 13:52 0917-173 | Ne13_10_15_1352_31_591 |          | 1          | 0.177      | 1.103              | 0.008              | 0.079                    | 0.980              | 0.0780             | 0.4250          | 1.566              | -2.753                | 0.241     | -0.0040                   | 0.0000    | -0.49              | 0.337     | 39.096       |
| 10/15/2013 13:53 0917-173 | Ne13_10_15_1353_32_351 |          | 1          | 1.612      | 1.072              | 0.021              | 0.078                    | 0.994              | 0.0780             | 0.4880          | 1.571              | -2.872                | 0.242     | -0.0070                   | 0.0000    | -0.45              | 0.332     | 40.205       |
| 10/15/2013 13:54 0917-173 | Ne13_10_15_1354_33_161 |          | 1          | 0.700      | 1.065              | 0.020              | 0.079                    | 1.020              | 0.0770             | 0.5370          | 1.573              | -2.924                | 0.244     | -0.0030                   | 0.0000    | -0.52              | 0.328     | 39.592       |
| 10/15/2013 13:55 0917-173 | Ne13_10_15_1355_33_891 |          | 1          | -1.250     | 1.049              | -0.005             | 0.076                    | 0.984              | 0.0800             | 0.3520          | 1.567              | -2.643                | 0.226     | -0.0090                   | 0.0000    | -0.20              | 0.331     | 37.986       |
| 10/15/2013 13:56 0917-173 | Ne13_10_15_1356_34_531 |          | 1          | 0.616      | 1.035              | -0.064             | 0.074                    | 1.012              | 0.0790             | 0.238           | 1.563              | -2.53                 | 0.226     | -0.0080                   | 0.0000    | -1.12              | 0.338     | 36.656       |
| 10/15/2013 13:57 0917-173 | Ne13_10_15_1357_35_441 |          | 1          | 1.357      | 0.988              | -0.088             | 0.075                    | 0.854              | 0.0770             | 0.4170          | 1.555              | -2.282                | 0.215     | -0.0070                   | 0.0000    | -0.52              | 0.322     | 35.18        |
| 10/15/2013 13:58 0917-173 | Ne13_10_15_1358_36_181 |          | 1          | -0.986     | 1.047              | -0.052             | 0.072                    | 0.896              | 0.0760             | 0.4920          | 1.551              | -2.378                | 0.207     | -0.0060                   | 0.0000    | -0.23              | 0.325     | 34.221       |
| 10/15/2013 13:59 0917-173 | Ne13_10_15_1359_36_931 |          | 1          | 0.793      | 1.104              | 0.052              | 0.073                    | 0.854              | 0.0760             | 0.617           | 1.564              | -2.428                | 0.216     | -0.0040                   | 0.0000    | -0.48              | 0.334     | 33.888       |
| 10/15/2013 14:00 0917-173 | Ne13_10_15_1400_37_771 |          | 1          | 1.240      | 0.968              | -0.0900            | 0.070                    | 0.972              | 0.0770             | 0.528           | 1.552              | -2.246                | 0.204     | -0.0030                   | 0.0000    | -1.03              | 0.303     | 33.897       |
| 10/15/2013 14:01 0917-173 | Ne13_10_15_1401_38_521 |          | 1          | 0.290      | 1.015              | 0.020              | 0.071                    | 0.952              | 0.0760             | 0.5550          | 1.561              | -2.363                | 0.211     | -0.0030                   | 0.0000    | -0.54              | 0.341     | 33.613       |
| 10/15/2013 14:02 0917-173 | Ne13_10_15_1402_39_241 |          | 1          | -1.880     | 1.028              | -0.035             | 0.075                    | 1.006              | 0.0770             | 0.4480          | 1.575              | -2.38                 | 0.216     | -0.0020                   | 0.0000    | -0.76              | 0.328     | 37.451       |
| 10/15/2013 14:03 0917-173 | Ne13_10_15_1403_40_061 |          | 1          | 0.196      | 1.097              | -0.018             | 0.069                    | 0.980              | 0.0780             | 0.5050          | 1.560              | -2.321                | 0.214     | -0.0040                   | 0.0000    | -0.65              | 0.331     | 35.16        |
| 10/15/2013 14:04 0917-173 | Ne13_10_15_1404_40_782 |          | 1          | 2.838      | 1.044              | -0.024             | 0.068                    | 1.044              | 0.0770             | 0.5880          | 1.561              | -2.221                | 0.218     | -0.0030                   | 0.0000    | -0.82              | 0.337     | 35.389       |
| 10/15/2013 14:05 0917-173 | Ne13_10_15_1405_41_502 |          | 1          | 0.743      | 1.090              | -0.070             | 0.074                    | 0.910              | 0.0770             | 0.5030          | 1.552              | -2.376                | 0.211     | -0.0030                   | 0.0000    | -0.28              | 0.337     | 34.955       |
| 10/15/2013 14:06 0917-173 | Ne13_10_15_1406_42_382 |          | 1          | 0.668      | 1.043              | 0.093              | 0.070                    | 0.848              | 0.0760             | 0.4820          | 1.543              | -2.37                 | 0.210     | -0.0050                   | 0.0000    | -0.50              | 0.322     | 34.215       |
| 10/15/2013 14:07 0917-173 | Ne13_10_15_1407_43_092 |          | 1          | 0.410      | 1.087              | 0.007              | 0.077                    | 0.904              | 0.0750             | 0.3550          | 1.545              | -2.409                | 0.218     | -0.0050                   | 0.0000    | -0.13              | 0.344     | 35.176       |
| 10/15/2013 14:08 0917-173 | Ne13_10_15_1408_43_852 |          | 1          | 1.767      | 1.033              | 0.075              | 0.073                    | 0.925              | 0.0740             | 0.447           | 1.546              | -2.46                 | 0.216     | -0.004                    | 0.0000    | -0.44              | 0.316     | 34.446       |
| 10/15/2013 14:09 0917-173 | Ne13_10_15_1409_44_632 |          | 1          | 3.328      | 1.077              | 0.047              | 0.075                    | 0.792              | 0.0760             | 0.5080          | 1.553              | -2.044                | 0.199     | -0.0010                   | 0.0000    | -0.54              | 0.326     | 31.462       |
| 10/15/2013 14:10 0917-173 | Ne13_10_15_1410_45_332 |          | 1          | 0.773      | 1.072              | 0.068              | 0.074                    | 0.916              | 0.0760             | 0.3810          | 1.555              | -2.392                | 0.218     | -0.0020                   | 0.0000    | -0.23              | 0.335     | 35.79        |
| 10/15/2013 14:11 0917-173 | Ne13_10_15_1411_46_132 |          | 1          | 1.052      | 1.025              | -0.040             | 0.079                    | 0.993              | 0.0770             | 0.4480          | 1.555              | -2.574                | 0.220     | -0.0030                   | 0.0000    | -0.67              | 0.319     | 37.818       |
| 10/15/2013 14:12 0917-173 | Ne13_10_15_1412_46_892 |          | 1          | 2.066      | 1.                 |                    |                          |                    |                    |                 |                    |                       |           |                           |           |                    |           |              |

Location Disc. # Start/Stop Instrument

Date

Method Filename

OF Acroline (ppm)

SEC (ppm)

Formaldehyde (ppm)

SEC (ppm)

Methanol (ppm)

SEC (ppm)

Phenol (ppm)

SEC (ppm)

Propionaldehyde (ppm)

SEC (ppm)

Sulfur Hexafluoride (ppm)

SEC (ppm)

acetaldehyde (ppm)

SEC (ppm)

pinene (ppm)

Data Run 7 Start A

Date

Run

7 Start

A

Stop

Data Run 8 Start A

Date

Run

8 Start

A

Label  
6-Analyte

Label  
6-Analyte

Label  
3-Analyte/Spike

Label  
4-Analyte

Label  
5-Analyte

Label  
Tracer

Label  
6-Analyte

| Location                                               | Disc.  | #        | Start/Stop | Instrument     | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                    |           |             |
|--------------------------------------------------------|--------|----------|------------|----------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|--------------------|-----------|-------------|
| Date                                                   | Method | Filename | DF         | Acrolein (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur Hexafluoride (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) | pinene (pg) |
| 10/15/2013 18:15 0917-173, Ne13, 10, 15, 1855, 20, 197 |        |          |            | -0.86          | 1.475              | 0.836              | 2.86                     | 2.95               | 0.155              | -0.269          | 1.99               | -2.52                 | 0.82      | -0.0080                   | 0.00500   | -5.3               | 0.61      | 132.152     |
| 10/15/2013 18:56 0917-173, Ne13, 10, 15, 1856, 20, 907 |        |          |            | -1.40          | 1.415              | 0.793              | 0.214                    | 2.98               | 0.155              | -0.269          | 1.99               | -2.52                 | 0.82      | -0.0080                   | 0.00500   | -4.9               | 0.61      | 132.304     |
| 10/15/2013 18:57 0917-173, Ne13, 10, 15, 1857, 21, 717 |        |          |            | -0.85          | 1.412              | 0.803              | 0.213                    | 2.98               | 0.155              | -0.274          | 2.00               | -2.66                 | 0.83      | -0.0050                   | 0.00500   | -5.3               | 0.59      | 134.15      |
| 10/15/2013 18:58 0917-173, Ne13, 10, 15, 1858, 21, 447 |        |          |            | -1.00          | 1.476              | 0.873              | 0.214                    | 2.94               | 0.158              | -0.212          | 2.01               | -2.57                 | 0.83      | -0.0040                   | 0.00500   | -5.4               | 0.60      | 134.011     |
| 10/15/2013 18:59 0917-173, Ne13, 10, 15, 1859, 21, 207 |        |          |            | -1.89          | 1.480              | 1.003              | 0.219                    | 2.97               | 0.160              | -0.355          | 1.99               | -2.22                 | 0.83      | -0.0100                   | 0.00500   | -5.3               | 0.61      | 133.955     |
| 10/15/2013 19:00 0917-173, Ne13, 10, 15, 1900, 21, 947 |        |          |            | -2.78          | 1.504              | 0.999              | 0.220                    | 2.95               | 0.157              | -0.502          | 2.01               | -2.10                 | 0.84      | -0.0060                   | 0.00500   | -5.6               | 0.60      | 133.555     |
| 10/15/2013 19:01 0917-173, Ne13, 10, 15, 1901, 21, 647 |        |          |            | -1.18          | 1.501              | 1.075              | 0.218                    | 3.05               | 0.159              | -0.377          | 2.00               | -2.17                 | 0.84      | -0.0050                   | 0.00500   | -5.7               | 0.62      | 134.241     |
| 10/15/2013 19:02 0917-173, Ne13, 10, 15, 1902, 21, 447 |        |          |            | -1.59          | 1.473              | 0.995              | 0.287                    | 2.97               | 0.157              | -0.369          | 2.00               | -2.38                 | 0.84      | -0.0070                   | 0.00500   | -5.8               | 0.62      | 135.13      |
| 10/15/2013 19:03 0917-173, Ne13, 10, 15, 1903, 26, 167 |        |          |            | -2.24          | 1.455              | 0.913              | 0.225                    | 3.03               | 0.162              | -0.144          | 1.99               | -2.39                 | 0.85      | -0.0060                   | 0.00500   | -5.8               | 0.61      | 136.342     |
| 10/15/2013 19:04 0917-173, Ne13, 10, 15, 1904, 26, 967 |        |          |            | -2.21          | 1.555              | 0.904              | 0.216                    | 3.05               | 0.164              | -0.478          | 1.99               | -2.48                 | 0.84      | -0.0030                   | 0.00500   | -5.1               | 0.62      | 136.763     |
| 10/15/2013 19:05 0917-173, Ne13, 10, 15, 1905, 27, 678 |        |          |            | -1.13          | 1.403              | 0.982              | 0.220                    | 3.01               | 0.165              | -0.292          | 2.01               | -2.30                 | 0.84      | -0.0020                   | 0.00500   | -5.7               | 0.60      | 135.275     |
| 10/15/2013 19:06 0917-173, Ne13, 10, 15, 1906, 26, 368 |        |          |            | -1.22          | 1.489              | 0.961              | 0.221                    | 3.03               | 0.162              | -0.537          | 2.00               | -2.29                 | 0.84      | -0.0030                   | 0.00500   | -5.7               | 0.62      | 133.523     |
| 10/15/2013 19:07 0917-173, Ne13, 10, 15, 1907, 29, 148 |        |          |            | -1.45          | 1.488              | 0.801              | 0.218                    | 3.02               | 0.162              | -0.309          | 2.01               | -2.13                 | 0.82      | -0.0080                   | 0.00500   | -5.3               | 0.61      | 132.729     |
| 10/15/2013 19:08 0917-173, Ne13, 10, 15, 1908, 29, 878 |        |          |            | -1.90          | 1.525              | 0.939              | 0.211                    | 3.02               | 0.159              | -0.351          | 1.99               | -2.05                 | 0.81      | -0.0060                   | 0.00500   | -5.5               | 0.61      | 130.741     |
| 10/15/2013 19:09 0917-173, Ne13, 10, 15, 1909, 30, 638 |        |          |            | -2.51          | 1.462              | 0.873              | 0.205                    | 2.95               | 0.160              | -0.384          | 1.99               | -1.77                 | 0.79      | -0.0090                   | 0.00500   | -5.5               | 0.60      | 129.359     |
| 10/15/2013 19:10 0917-173, Ne13, 10, 15, 1910, 31, 398 |        |          |            | -0.38          | 1.514              | 0.782              | 0.203                    | 2.96               | 0.156              | -0.231          | 2.01               | -1.83                 | 0.78      | -0.0070                   | 0.00500   | -5.1               | 0.59      | 126.346     |
| 10/15/2013 19:11 0917-173, Ne13, 10, 15, 1911, 32, 168 |        |          |            | -1.64          | 1.437              | 0.865              | 0.203                    | 2.91               | 0.154              | -0.375          | 2.00               | -1.56                 | 0.76      | -0.0050                   | 0.00500   | -5.2               | 0.60      | 124.642     |
| 10/15/2013 19:12 0917-173, Ne13, 10, 15, 1912, 32, 878 |        |          |            | -2.21          | 1.372              | 0.832              | 0.199                    | 3.00               | 0.154              | -0.426          | 2.00               | -1.47                 | 0.76      | -0.0060                   | 0.00500   | -5.0               | 0.58      | 123.995     |
| 10/15/2013 19:13 0917-173, Ne13, 10, 15, 1913, 32, 668 |        |          |            | -1.21          | 1.412              | 0.830              | 0.202                    | 2.93               | 0.153              | -0.242          | 2.00               | -1.61                 | 0.76      | -0.0010                   | 0.00500   | -5.0               | 0.59      | 124.839     |
| 10/15/2013 19:14 0917-173, Ne13, 10, 15, 1914, 34, 358 |        |          |            | 0.08           | 1.496              | 0.962              | 0.204                    | 3.02               | 0.155              | -0.072          | 2.02               | -1.45                 | 0.77      | -0.0070                   | 0.00500   | -4.8               | 0.58      | 125.734     |
| 10/15/2013 19:15 0917-173, Ne13, 10, 15, 1915, 35, 158 |        |          |            | -2.68          | 1.496              | 0.838              | 0.197                    | 2.87               | 0.154              | -0.229          | 2.00               | -1.49                 | 0.76      | -0.0100                   | 0.00500   | -4.4               | 0.60      | 124.854     |
| 10/15/2013 19:16 0917-173, Ne13, 10, 15, 1916, 35, 858 |        |          |            | -0.82          | 1.477              | 0.967              | 0.205                    | 2.87               | 0.155              | -0.243          | 2.00               | -1.23                 | 0.76      | -0.0000                   | 0.00500   | -5.3               | 0.60      | 124.187     |
| 10/15/2013 19:17 0917-173, Ne13, 10, 15, 1917, 36, 589 |        |          |            | -1.38          | 1.518              | 0.884              | 0.196                    | 2.83               | 0.153              | -0.188          | 2.01               | -1.22                 | 0.75      | -0.0040                   | 0.00500   | -5.3               | 0.61      | 122.84      |
| 10/15/2013 19:18 0917-173, Ne13, 10, 15, 1918, 37, 339 |        |          |            | -1.10          | 1.410              | 1.015              | 0.200                    | 2.77               | 0.150              | -0.159          | 2.00               | -1.22                 | 0.75      | -0.0070                   | 0.00500   | -5.2               | 0.59      | 121.81      |
| 10/15/2013 19:19 0917-173, Ne13, 10, 15, 1919, 38, 159 |        |          |            | -1.37          | 1.476              | 0.819              | 0.195                    | 2.77               | 0.148              | -0.414          | 2.00               | -0.83                 | 0.73      | -0.0060                   | 0.00500   | -5.9               | 0.60      | 118.846     |
| 10/15/2013 19:20 0917-173, Ne13, 10, 15, 1920, 38, 909 |        |          |            | -0.84          | 1.594              | 0.854              | 0.194                    | 2.74               | 0.150              | -0.250          | 2.00               | -0.72                 | 0.73      | -0.0050                   | 0.00500   | -5.3               | 0.60      | 119.157     |
| 10/15/2013 19:21 0917-173, Ne13, 10, 15, 1921, 39, 459 |        |          |            | -2.85          | 1.515              | 0.795              | 0.194                    | 2.72               | 0.148              | -0.202          | 2.00               | -0.95                 | 0.73      | -0.0070                   | 0.00500   | -5.6               | 0.59      | 119.695     |
| 10/15/2013 19:22 0917-173, Ne13, 10, 15, 1922, 40, 209 |        |          |            | -1.64          | 1.537              | 0.902              | 0.197                    | 2.74               | 0.150              | -0.036          | 2.00               | -1.06                 | 0.73      | -0.0040                   | 0.00500   | -5.1               | 0.60      | 119.682     |
| 10/15/2013 19:23 0917-173, Ne13, 10, 15, 1923, 41, 009 |        |          |            | -1.82          | 1.437              | 0.837              | 0.193                    | 2.74               | 0.149              | -0.259          | 2.00               | -1.04                 | 0.73      | -0.0050                   | 0.00500   | -5.1               | 0.61      | 120.009     |
| 10/15/2013 19:24 0917-173, Ne13, 10, 15, 1924, 41, 719 |        |          |            | -1.21          | 1.489              | 0.894              | 0.195                    | 2.65               | 0.147              | -0.287          | 2.00               | -0.74                 | 0.72      | -0.0070                   | 0.00500   | -5.3               | 0.60      | 120.693     |
| 10/15/2013 19:25 0917-173, Ne13, 10, 15, 1925, 41, 529 |        |          |            | -0.02          | 1.398              | 0.684              | 0.195                    | 2.60               | 0.150              | -0.256          | 2.00               | -1.07                 | 0.73      | -0.0050                   | 0.00500   | -5.5               | 0.57      | 120.737     |
| 10/15/2013 19:26 0917-173, Ne13, 10, 15, 1926, 41, 249 |        |          |            | -2.58          | 1.484              | 0.830              | 0.196                    | 2.65               | 0.151              | -0.149          | 2.01               | -0.98                 | 0.73      | -0.0020                   | 0.00500   | -6.0               | 0.60      | 119.877     |
| 10/15/2013 19:27 0917-173, Ne13, 10, 15, 1927, 41, 949 |        |          |            | -1.22          | 1.476              | 0.851              | 0.197                    | 2.71               | 0.152              | -0.182          | 2.00               | -0.74                 | 0.72      | -0.0050                   | 0.00500   | -5.8               | 0.57      | 120.441     |
| 10/15/2013 19:28 0917-173, Ne13, 10, 15, 1928, 44, 689 |        |          |            | -2.41          | 1.440              | 0.748              | 0.197                    | 2.79               | 0.152              | -0.222          | 2.00               | -1.53                 | 0.75      | -0.0050                   | 0.00500   | -6.3               | 0.57      | 121.01      |
| 10/15/2013 19:29 0917-173, Ne13, 10, 15, 1929, 45, 530 |        |          |            | -0.11          | 1.444              | 0.633              | 0.201                    | 2.81               | 0.155              | -0.272          | 1.99               | -1.85                 | 0.75      | -0.0050                   | 0.00500   | -4.6               | 0.59      | 121.626     |
| 10/15/2013 19:30 0917-173, Ne13, 10, 15, 1930, 46, 270 |        |          |            | -1.22          | 1.412              | 0.720              | 0.206                    | 3.00               | 0.157              | -0.198          | 2.00               | -2.11                 | 0.76      | -0.0070                   | 0.00500   | -4.4               | 0.58      | 123.762     |
| 10/15/2013 19:31 0917-173, Ne13, 10, 15, 1931, 47, 030 |        |          |            | -1.22          | 1.482              | 0.729              | 0.207                    | 3.08               | 0.160              | -0.200          | 2.00               | -0.77                 | 0.60      | -0.0030                   | 0.00500   | -4.0               | 0.60      | 124.111     |
| 10/15/2013 19:32 0917-173, Ne13, 10, 15, 1932, 47, 740 |        |          |            | -0.86          | 1.463              | 0.706              | 0.212                    | 3.16               | 0.163              | -0.29           | 2.00               | -2.20                 | 0.78      | -0.0100                   | 0.00500   | -4.8               | 0.56      | 125.021     |
| 10/15/2013 19:33 0917-173, Ne13, 10, 15, 1933, 48, 540 |        |          |            | -1.84          | 1.506              | 0.657              | 0.206                    | 3.20               | 0.166              | -0.19           | 2.01               | -2.39                 | 0.78      | -0.0070                   | 0.00500   | -4.6               | 0.58      | 124.943     |
| 10/15/2013 19:34 0917-173, Ne13, 10, 15, 1934, 48, 250 |        |          |            | -0.49          | 1.432              | 0.658              | 0.206                    | 3.24               | 0.166              | -0.250          | 2.00               | -0.76                 | 0.62      | -0.0070                   | 0.00500   | -4.2               | 0.58      | 123.402     |
| 10/15/2013 19:35 0917-173, Ne13, 10, 15, 1935, 50, 070 |        |          |            | -2.04          | 1.500              | 0.6010             | 0.202                    | 3.12               | 0.164              | -0.502          | 2.01               | -2.26                 | 0.76      | -0.0070                   | 0.00500   | -4.3               | 0.58      | 121.573     |
| 10/15/2013 19:36 0917-173, Ne13, 10, 15, 1936, 50, 850 |        |          |            | -1.55          | 1.441              | 0.768              | 0.196                    | 3.09               | 0.156              | -0.28           | 2.00               | -1.89                 | 0.73      | -0.0090                   | 0.00500   | -4.4               | 0.57      | 118.386     |
| 10/15/2013 19:37 0917-173, Ne13, 10, 15, 1937, 51, 560 |        |          |            | -0.03          | 1.397              | 0.651              | 0.190                    | 3.08               | 0.160              | -0.275          | 2.00               | -2.07                 | 0.72      | -0.0040                   | 0.00500   | -3.7               | 0.56      | 116.791     |
| 10/15/2013 19:38 0917-173, Ne13, 10, 15, 1938, 52, 250 |        |          |            | -1.89          | 1.447              | 0.817              | 0.196                    | 2.98               | 0.155              | -0.250          | 2.00               | -0.71                 | 0.69      | -0.0080                   | 0.00500   | -4.3               | 0.56      | 115.501     |
| 10/15/2013 19:39 0917-173, Ne13, 10, 15, 1939, 53, 120 |        |          |            | -0.29          | 1.531              | 0.706              | 0.185                    | 2.92               | 0.150              | -0.074          | 2.01               | -1.72                 | 0.69      | -0.0040                   | 0.00500   | -4.2               | 0.56      | 113.403     |
| 10/15/2013 19:40 0917-173, Ne13, 10, 15, 1940, 54, 831 |        |          |            | -1.71          | 1.385              | 0.765              | 0.186                    | 2.92               | 0.148              | -0.021          | 2.00               | -1.60                 | 0.69      | -0.0080                   | 0.00500   | -4.3               | 0.53      | 111.833     |
| 10/15/2013 19:41 0917-173, Ne13, 10, 15, 1941, 54, 551 |        |          |            | -1.03          | 1.471              | 0.801              | 0.189                    | 2.91               | 0.147              | -0.172          | 2.01               | -1.55                 | 0.71      | -0.0050                   | 0.00500   | -4.5               | 0.55      | 110.371     |
| 10/15/2013 19:42 0917-173, Ne13, 10, 15, 1942, 55, 311 |        |          |            | -1.71          | 1.564              | 0.762              | 0.180                    | 2.86               | 0.147              | -0.101          | 2.00               | -1.64                 | 0.67      | -0.0060                   | 0.00500   | -4.0               | 0.57      | 109.172     |
| 10/15/2013 19:43 0917-173, Ne13, 10, 15, 1943, 56, 131 |        |          |            | 0.38           | 1.500              | 0.719              | 0.179                    | 2.88               | 0.150              | -0.113          | 2.01               | -1.71                 | 0.67      | -0.0110                   | 0.00500   | -4.1               | 0.55      | 110.008     |
| 10/15/2013 19:44 0917-173, Ne13, 10, 15, 1944, 56, 911 |        |          |            | 0.00           | 1.487              | 0.773              | 0.184                    | 2.87               | 0.147              | -0.021          | 1.99               | -1.56                 | 0.68      | -0.0040                   | 0.00500   | -4.6               | 0.51      | 109.132     |
| 10/15/2013 19:45 0917-173, Ne13, 10, 15, 1945, 56, 631 |        |          |            | -1.64          | 1.485              | 0.784              | 0.185                    | 2.84               | 0.148              | -0.155          | 2.01               | -0.87                 | 0.69      | -0.0080                   | 0.00500   | -3.9               | 0.55      | 108.029     |
| 10/15/2013 19:46 0917-173, Ne13, 10, 15, 1946, 58, 371 |        |          |            | -0.75          | 1.486              | 0.784              | 0.181                    | 2.69               | 0.144              | -0.013          | 2.00               | -1.41                 | 0.66      | -0.0090                   | 0.00500   | -3.6               | 0.55      | 107.554     |
| 10/15/2013 19:47 0917-173, Ne13, 10, 15, 1947, 59, 161 |        |          |            | 0.81           | 1.494              | 0.812              | 0.175                    | 2.72               | 0.142              | -0.042          | 2.00               | -1.26                 | 0.65      | -0.0090                   | 0.00500   | -4.3               | 0.54      | 107.184     |
| 10/15/2013 19:48 0917-173, Ne13, 10, 15, 1948, 59, 301 |        |          |            | -2.89          | 1.335              | -0.950             | 0.235                    | 0.773              | 0.0820             | 0.206           | 1.944              | -8.30                 | 0.50      | -0.0080                   | 0.00500   | -3.38              | 0.73      | 57.076      |
| 10/15/2013 19:50 0917-173, Ne13, 10, 15, 1950, 60, 294 |        |          |            | -1.69          | 1.294              | -1.561             | 0.240                    | -0.151             | 0.0920             | -0.1010         | 0.252              | -0.152                | 0.09      | -0.0100                   | 0         |                    |           |             |



| Location                  | Disc.                  | #        | Start/Stop | Instrument     | Label<br>6-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>6-Analyte | Label<br>6-Analyte |                       |           |                           |           |                    |           |              |
|---------------------------|------------------------|----------|------------|----------------|--------------------|--------------------|--------------------------|--------------------|--------------------|--------------------|--------------------|-----------------------|-----------|---------------------------|-----------|--------------------|-----------|--------------|
| Date                      | Method                 | Filename | OF         | Acrolein (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)       | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur Hexafluoride (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/15/2013 21:30 0917-173 | Ne13_10_15_2130_21_49  | 0.2311   | 0.0000     | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:30 0917-173 | Ne13_10_15_2130_28_054 | 5.00     | 2.887      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:30 0917-173 | Ne13_10_15_2130_41_894 | 2.302    | 3.086      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:30 0917-173 | Ne13_10_15_2130_41_894 | 0.702    | 3.075      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:30 0917-173 | Ne13_10_15_2130_47_464 | 2.231    | 2.995      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:30 0917-173 | Ne13_10_15_2130_51_364 | 1.16     | 3.211      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:30 0917-173 | Ne13_10_15_2130_59_554 | 0.1274   | 3.111      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:31 0917-173 | Ne13_10_15_2131_05_704 | 1.539    | 3.207      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:31 0917-173 | Ne13_10_15_2131_11_964 | -0.523   | 3.014      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:31 0917-173 | Ne13_10_15_2131_18_044 | 0.685    | 3.563      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:31 0917-173 | Ne13_10_15_2131_24_444 | -2.42    | 3.047      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:31 0917-173 | Ne13_10_15_2131_36_444 | 1.505    | 3.122      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:31 0917-173 | Ne13_10_15_2131_36_794 | -1.932   | 3.536      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:31 0917-173 | Ne13_10_15_2131_42_884 | -3.71    | 3.68       | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:31 0917-173 | Ne13_10_15_2131_49_044 | -0.437   | 3.408      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:31 0917-173 | Ne13_10_15_2131_56_304 | 1.22     | 3.196      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:32 0917-173 | Ne13_10_15_2132_01_394 | -4.110   | 3.206      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:32 0917-173 | Ne13_10_15_2132_07_574 | -4.956   | 3.282      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:32 0917-173 | Ne13_10_15_2132_16_464 | -0.991   | 3.230      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:32 0917-173 | Ne13_10_15_2132_19_844 | -4.794   | 3.545      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:32 0917-173 | Ne13_10_15_2132_26_064 | 0.008    | 3.464      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:32 0917-173 | Ne13_10_15_2132_32_244 | -3.555   | 3.290      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:32 0917-173 | Ne13_10_15_2132_38_444 | 1.06     | 3.016      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:32 0917-173 | Ne13_10_15_2132_44_534 | -0.930   | 3.261      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:32 0917-173 | Ne13_10_15_2132_50_814 | -2.587   | 3.393      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:32 0917-173 | Ne13_10_15_2132_56_904 | -2.018   | 3.353      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:33 0917-173 | Ne13_10_15_2133_03_164 | -2.793   | 3.061      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:33 0917-173 | Ne13_10_15_2133_09_364 | -4.803   | 3.192      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:33 0917-173 | Ne13_10_15_2133_15_454 | -5.37    | 3.433      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:33 0917-173 | Ne13_10_15_2133_21_724 | -5.790   | 3.115      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:33 0917-173 | Ne13_10_15_2133_27_854 | 4.232    | 3.049      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:33 0917-173 | Ne13_10_15_2133_34_044 | -7.097   | 3.143      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:33 0917-173 | Ne13_10_15_2133_40_254 | -1.41    | 3.166      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:33 0917-173 | Ne13_10_15_2133_46_344 | -5.746   | 3.086      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:33 0917-173 | Ne13_10_15_2133_52_544 | -1.19    | 3.237      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:33 0917-173 | Ne13_10_15_2133_58_824 | 0.680    | 2.925      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:34 0917-173 | Ne13_10_15_2134_05_054 | -2.361   | 3.076      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:34 0917-173 | Ne13_10_15_2134_11_214 | 0.256    | 3.083      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:34 0917-173 | Ne13_10_15_2134_17_304 | -6.071   | 2.764      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:34 0917-173 | Ne13_10_15_2134_24_504 | -11.60   | 2.718      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:34 0917-173 | Ne13_10_15_2134_28_074 | 1.06     | 2.703      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:34 0917-173 | Ne13_10_15_2134_35_864 | 4.487    | 3.004      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:34 0917-173 | Ne13_10_15_2134_42_064 | 1.19     | 2.905      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:34 0917-173 | Ne13_10_15_2134_48_164 | -4.754   | 3.048      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:34 0917-173 | Ne13_10_15_2134_54_354 | -5.064   | 3.013      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:35 0917-173 | Ne13_10_15_2135_01_544 | -4.321   | 3.062      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:35 0917-173 | Ne13_10_15_2135_08_544 | -5.07    | 3.474      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:35 0917-173 | Ne13_10_15_2135_15_004 | 0.109    | 3.364      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:35 0917-173 | Ne13_10_15_2135_19_124 | -4.506   | 3.172      | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000             | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 21:35 0917-173 | Ne13_10_15_2135_25_284 | -2.      |            |                |                    |                    |                          |                    |                    |                    |                    |                       |           |                           |           |                    |           |              |

| Location                                          | Disc.  | #        | Start/Stop | Instrument | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                    |           |              |
|---------------------------------------------------|--------|----------|------------|------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|--------------------|-----------|--------------|
| Date                                              | Method | Filename | OF         | Acrolein   | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur Hexafluoride (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/16/2013 8:15 0917-173, Ne13_10_16_0815_51_860  | 1      | 0.001    | 0.002      | 1.5        | 1.5                | 0.080              | 0.081                    | 0.53               | 1.63               | 0.0030          | 0.0960             | -0.317                | 0.135     | 0.069                     | 0.657     | 0.35               | 0.446     | -2.011       |
| 10/16/2013 8:36 0917-173, Ne13_10_16_0836_18_370  | 1      | -2.2     | 1.5        | 0.087      | 0.091              | -0.087             | 0.084                    | -0.49              | 1.64               | 0.057           | 0.0900             | -0.2170               | 0.138     | 0.066                     | 0.653     | 0.533              | 0.439     | -2.052       |
| 10/16/2013 8:36 0917-173, Ne13_10_16_0836_35_990  | 1      | 0.6      | 1.4        | 0.175      | 0.081              | -0.55              | 1.64                     | -0.9600            | 0.0990             | 0.0720          | 0.130              | 0.058                 | 0.656     | 0.058                     | 0.656     | -0.7950            | 0.440     | -2.007       |
| 10/16/2013 8:37 0917-173, Ne13_10_16_0837_14_090  | 1      | 1.6      | 1.5        | 0.0940     | 0.078              | 0.66               | 1.64                     | 0.154              | 0.1050             | 0.181           | 0.111              | 0.081                 | 0.111     | 0.069                     | 0.652     | -0.2320            | 0.440     | -2.052       |
| 10/16/2013 8:37 0917-173, Ne13_10_16_0837_32_591  | 1      | 2.1      | 1.4        | -0.0740    | 0.074              | -0.54              | 1.65                     | -0.0100            | 0.1050             | -0.232          | 0.120              | -0.064                | 0.657     | 0.064                     | 0.657     | 0.3180             | 0.408     | -2.026       |
| 10/16/2013 8:37 0917-173, Ne13_10_16_0837_51_001  | 1      | -0.6     | 1.5        | -0.001     | 0.087              | -0.61              | 1.64                     | -0.0730            | 0.0940             | -0.0820         | 0.140              | 0.072                 | 0.660     | 0.072                     | 0.660     | 0.87               | 0.473     | -2.027       |
| 10/16/2013 8:38 0917-173, Ne13_10_16_0838_05_051  | 1      | 2.4      | 1.5        | 0.1300     | 0.075              | 0.51               | 1.54                     | 0.3600             | 0.095              | 0.075           | 0.137              | 0.075                 | 0.137     | 0.075                     | 0.137     | 0.468              | -2.034    |              |
| 10/16/2013 8:38 0917-173, Ne13_10_16_0838_28_111  | 1      | -2.4     | 1.5        | -0.121     | 0.087              | -0.50              | 1.64                     | 0.1350             | 0.0980             | -0.140          | 0.139              | -0.069                | 0.654     | 0.069                     | 0.654     | 0.047              | 0.455     | -2.028       |
| 10/16/2013 8:38 0917-173, Ne13_10_16_0838_46_631  | 1      | -0.1     | 1.7        | -0.0700    | 0.075              | -0.61              | 1.65                     | -0.1350            | 0.1050             | 0.261           | 0.132              | 0.074                 | 0.658     |                           | 0.658     | -1.196             | 0.453     | -2.027       |
| 10/16/2013 8:39 0917-173, Ne13_10_16_0839_05_251  | 1      | 2.2      | 1.4        | -0.011     | 0.078              | -0.46              | 1.64                     | 0.0660             | 0.1000             | 0.000           | 0.128              | 0.071                 | 0.655     | 0.071                     | 0.655     | -0.010             | 0.424     | -2.042       |
| 10/16/2013 8:39 0917-173, Ne13_10_16_0839_30_781  | 1      | 1.5      | 0.4        | 0.055      | 0.084              | 0.05               | 0.084                    | 0.120              | 0.1030             | 0.014           | 0.136              | 0.064                 | 0.658     | 0.064                     | 0.658     | 0.461              | 0.439     | -1.999       |
| 10/16/2013 8:40 0917-173, Ne13_10_16_0839_42_371  | 1      | -2.4     | 1.4        | -0.020     | 0.081              | -0.49              | 1.64                     | -0.141             | 0.1000             | 0.066           | 0.133              | 0.066                 | 0.639     | 0.066                     | 0.639     | 0.286              | 0.431     | -1.989       |
| 10/16/2013 8:40 0917-173, Ne13_10_16_0840_00_791  | 1      | 0.5      | 1.6        | 0.060      | 0.080              | -0.49              | 1.64                     | -0.1400            | 0.1050             | -0.1690         | 0.135              | -0.060                | 0.639     | 0.060                     | 0.639     | 0.487              | 0.462     | -1.991       |
| 10/16/2013 10:53 0917-173, Ne13_10_16_1053_01_590 | 1      | 0.765    | 1.130      | 0.001      | 0.073              | 0.715              | 0.080                    | 0.425              | 1.742              | -1.258          | 0.148              | -0.0030               | 0.0500    | 0.04                      | 0.36      | 0.1634             |           |              |
| 10/16/2013 10:54 0917-173, Ne13_10_16_1054_01_360 | 1      | -0.08    | 1.102      | 0.070      | 0.059              | 0.487              | 0.060                    | 0.287              | 1.533              | -0.993          | 0.127              | -0.0030               | 0.0500    | 0.09                      | 0.233     | 0.1581             |           |              |
| 10/16/2013 10:55 0917-173, Ne13_10_16_1055_02_170 | 1      | 0.978    | 1.066      | -0.075     | 0.069              | 0.569              | 0.090                    | 0.347              | 1.534              | -1.391          | 0.156              | -0.0000               | 0.0500    | -0.68                     | 0.335     | 0.21               |           |              |
| 10/16/2013 10:56 0917-173, Ne13_10_16_1056_02_880 | 1      | -2.597   | 1.094      | -0.037     | 0.068              | 0.637              | 0.040                    | 0.496              | 1.546              | -1.590          | 0.165              | -0.0050               | 0.0400    | -0.64                     | 0.331     | 0.2465             |           |              |
| 10/16/2013 10:57 0917-173, Ne13_10_16_1057_03_630 | 1      | -0.23    | 1.072      | 0.161      | 0.066              | 0.668              | 0.070                    | 0.471              | 1.546              | -1.591          | 0.168              | -0.0000               | 0.0500    | 0.87                      | 0.310     | 0.2439             |           |              |
| 10/16/2013 10:58 0917-173, Ne13_10_16_1058_04_380 | 1      | -2.260   | 1.086      | -0.033     | 0.074              | 0.718              | 0.070                    | 0.485              | 1.547              | -1.800          | 0.178              | -0.0030               | 0.0400    | -0.99                     | 0.342     | 0.2599             |           |              |
| 10/16/2013 10:59 0917-173, Ne13_10_16_1059_05_200 | 1      | -2.59    | 1.061      | 0.0310     | 0.070              | 0.717              | 0.070                    | 0.474              | 1.545              | -1.52           | 0.162              | -0.0030               | 0.0400    | -1.36                     | 0.319     | 0.2352             |           |              |
| 10/16/2013 11:00 0917-173, Ne13_10_16_1100_06_030 | 1      | -0.63    | 1.004      | 0.048      | 0.057              | 0.779              | 0.090                    | 0.528              | 1.540              | -1.383          | 0.155              | -0.0050               | 0.0500    | -1.31                     | 0.321     | 0.2284             |           |              |
| 10/16/2013 11:01 0917-173, Ne13_10_16_1101_06_711 | 1      | -0.250   | 1.107      | -0.039     | 0.067              | 0.772              | 0.070                    | 0.518              | 1.523              | -1.696          | 0.168              | -0.0030               | 0.0400    | -0.94                     | 0.331     | 0.2428             |           |              |
| 10/16/2013 11:02 0917-173, Ne13_10_16_1102_07_491 | 1      | -0.72    | 1.163      | -0.1020    | 0.071              | 0.692              | 0.070                    | 0.491              | 1.520              | -1.77           | 0.177              | -0.0030               | 0.0500    | -1.22                     | 0.342     | 0.2632             |           |              |
| 10/16/2013 11:03 0917-173, Ne13_10_16_1103_08_281 | 1      | -1.32    | 1.040      | 0.052      | 0.067              | 0.724              | 0.080                    | 0.441              | 1.527              | -1.722          | 0.169              | -0.0030               | 0.0500    | -0.86                     | 0.322     | 0.2312             |           |              |
| 10/16/2013 11:04 0917-173, Ne13_10_16_1104_09_061 | 1      | 0.40     | 1.100      | 0.200      | 0.069              | 0.700              | 0.090                    | 0.483              | 1.522              | -1.595          | 0.170              | -0.0060               | 0.0500    | -0.36                     | 0.32      | 0.2468             |           |              |
| 10/16/2013 11:05 0917-173, Ne13_10_16_1105_09_761 | 1      | -1.63    | 1.105      | 0.0050     | 0.068              | 0.732              | 0.080                    | 0.404              | 1.511              | -1.757          | 0.171              | -0.0030               | 0.0400    | -0.73                     | 0.334     | 0.2596             |           |              |
| 10/16/2013 11:06 0917-173, Ne13_10_16_1106_10_521 | 1      | -0.786   | 1.090      | 0.093      | 0.068              | 0.723              | 0.090                    | 0.551              | 1.507              | -1.934          | 0.177              | 0.00                  | 0.0400    | -0.10                     | 0.340     | 0.2609             |           |              |
| 10/16/2013 11:07 0917-173, Ne13_10_16_1107_11_131 | 1      | -1.688   | 1.139      | 0.009      | 0.071              | 0.648              | 0.090                    | 0.471              | 1.511              | -1.822          | 0.175              | -0.0050               | 0.0500    | -0.21                     | 0.344     | 0.2615             |           |              |
| 10/16/2013 11:08 0917-173, Ne13_10_16_1108_12_061 | 1      | -1.424   | 1.098      | 0.064      | 0.068              | 0.720              | 0.090                    | 0.568              | 1.512              | -1.581          | 0.168              | -0.0030               | 0.0400    | -0.69                     | 0.312     | 0.2476             |           |              |
| 10/16/2013 11:09 0917-173, Ne13_10_16_1109_12_311 | 1      | -0.831   | 1.007      | -0.0600    | 0.069              | 0.674              | 0.070                    | 0.442              | 1.519              | -1.598          | 0.160              | -0.0020               | 0.0500    | -0.60                     | 0.329     | 0.2369             |           |              |
| 10/16/2013 11:10 0917-173, Ne13_10_16_1110_13_621 | 1      | -0.42    | 1.111      | -0.057     | 0.070              | 0.683              | 0.090                    | 0.387              | 1.536              | -1.45           | 0.163              | -0.0040               | 0.0500    | -1.25                     | 0.336     | 0.2382             |           |              |
| 10/16/2013 11:11 0917-173, Ne13_10_16_1111_14_141 | 1      | -1.3     | 1.139      | -0.075     | 0.070              | 0.675              | 0.070                    | 0.489              | 1.548              | -1.509          | 0.167              | -0.0030               | 0.0400    | -0.55                     | 0.338     | 0.2414             |           |              |
| 10/16/2013 11:12 0917-173, Ne13_10_16_1112_15_162 | 1      | 0.01     | 1.022      | 0.079      | 0.071              | 0.669              | 0.070                    | 0.421              | 1.559              | -1.548          | 0.166              | 0.0000                | 0.0500    | -0.52                     | 0.310     | 0.2469             |           |              |
| 10/16/2013 11:13 0917-173, Ne13_10_16_1113_15_972 | 1      | 1.36     | 1.103      | -0.0710    | 0.070              | 0.715              | 0.070                    | 0.448              | 1.563              | -1.719          | 0.173              | -0.0030               | 0.0500    | -0.98                     | 0.339     | 0.2593             |           |              |
| 10/16/2013 11:14 0917-173, Ne13_10_16_1114_16_732 | 1      | -0.91    | 1.136      | 0.010      | 0.070              | 0.685              | 0.070                    | 0.340              | 1.580              | -1.576          | 0.173              | -0.0070               | 0.0400    | -0.01                     | 0.328     | 0.2534             |           |              |
| 10/16/2013 11:15 0917-173, Ne13_10_16_1115_17_532 | 1      | 0.66     | 1.124      | 0.071      | 0.068              | 0.681              | 0.070                    | 0.489              | 1.548              | -1.509          | 0.167              | -0.0030               | 0.0400    | -0.34                     | 0.336     | 0.2576             |           |              |
| 10/16/2013 11:16 0917-173, Ne13_10_16_1116_18_342 | 1      | -1.49    | 1.039      | -0.0630    | 0.067              | 0.685              | 0.070                    | 0.359              | 1.568              | -1.754          | 0.165              | -0.0060               | 0.0500    | -0.64                     | 0.315     | 0.2485             |           |              |
| 10/16/2013 11:17 0917-173, Ne13_10_16_1117_19_052 | 1      | -0.436   | 1.096      | 0.0560     | 0.065              | 0.586              | 0.070                    | 0.449              | 1.571              | -1.433          | 0.159              | -0.0000               | 0.0500    | -0.68                     | 0.330     | 0.2326             |           |              |
| 10/16/2013 11:18 0917-173, Ne13_10_16_1118_19_792 | 1      | -0.988   | 1.006      | -0.0720    | 0.060              | 0.601              | 0.070                    | 0.466              | 1.562              | -1.639          | 0.160              | -0.0070               | 0.0400    | -0.36                     | 0.321     | 0.2346             |           |              |
| 10/16/2013 11:19 0917-173, Ne13_10_16_1119_20_502 | 1      | -2.14    | 1.188      | 0.069      | 0.072              | 0.666              | 0.070                    | 0.527              | 1.572              | -1.809          | 0.179              | -0.0070               | 0.0500    | -1.25                     | 0.351     | 0.27019            |           |              |
| 10/16/2013 11:20 0917-173, Ne13_10_16_1120_21_332 | 1      | -0.73    | 1.059      | -0.1310    | 0.066              | 0.673              | 0.070                    | 0.349              | 1.565              | -1.73           | 0.172              | -0.0030               | 0.0500    | -0.89                     | 0.308     | 0.2635             |           |              |
| 10/16/2013 11:21 0917-173, Ne13_10_16_1121_22_052 | 1      | -1.678   | 1.126      | -0.091     | 0.071              | 0.612              | 0.070                    | 0.469              | 1.575              | -1.938          | 0.180              | -0.0060               | 0.0500    | -0.61                     | 0.346     | 0.2674             |           |              |
| 10/16/2013 11:22 0917-173, Ne13_10_16_1122_22_852 | 1      | -0.25    | 1.081      | 0.072      | 0.067              | 0.671              | 0.070                    | 0.474              | 1.591              | -1.591          | 0.170              | -0.0030               | 0.0500    | -0.73                     | 0.317     | 0.2809             |           |              |
| 10/16/2013 11:23 0917-173, Ne13_10_16_1123_23_562 | 1      | -2.03    | 1.098      | 0.025      | 0.069              | 0.753              | 0.070                    | 0.405              | 1.581              | -1.849          | 0.178              | -0.0060               | 0.0500    | -0.47                     | 0.330     | 0.26157            |           |              |
| 10/16/2013 11:24 0917-173, Ne13_10_16_1124_24_403 | 1      | 0.023    | 1.065      | -0.014     | 0.068              | 0.695              | 0.070                    | 0.387              | 1.590              | -1.527          | 0.166              | -0.0040               | 0.0500    | -0.38                     | 0.331     | 0.2363             |           |              |
| 10/16/2013 11:25 0917-173, Ne13_10_16_1125_25_123 | 1      | -1.11    | 1.042      | -0.071     | 0.069              | 0.615              | 0.070                    | 0.462              | 1.591              | -1.612          | 0.160              | -0.0040               | 0.0500    | -0.31                     | 0.323     | 0.2524             |           |              |
| 10/16/2013 11:26 0917-173, Ne13_10_16_1126_25_883 | 1      | -1.571   | 1.102      | -0.0400    | 0.072              | 0.637              | 0.080                    | 0.447              | 1.581              | -1.893          | 0.188              | -0.0030               | 0.0400    | -0.40                     | 0.346     | 0.29163            |           |              |
| 10/16/2013 11:27 0917-173, Ne13_10_16_1127_26_683 | 1      | -0.25    | 1.187      | -0.0660    | 0.076              | 0.639              | 0.070                    | 0.570              | 1.589              | -2.45           | 0.225              | -0.0080               | 0.0500    | -1.24                     | 0.340     | 0.3501             |           |              |
| 10/16/2013 11:28 0917-173, Ne13_10_16_1128_27_423 | 1      | -0.89    | 1.025      | -0.067     | 0.070              | 0.725              | 0.070                    | 0.350              | 1.586              | -2.641          | 0.234              | -0.0040               | 0.0500    | -0.80                     | 0.312     | 0.2878             |           |              |
| 10/16/2013 11:29 0917-173, Ne13_10_16_1129_28_223 | 1      | -1.665   | 1.095      | -0.1750    | 0.066              | 0.762              | 0.080                    | 0.363              | 1.585              | -2.845          | 0.245              | -0.0060               | 0.0500    | -0.35                     | 0.341     | 0.3017             |           |              |
| 10/16/2013 11:30 0917-173, Ne13_10_16_1130_28_963 | 1      | -2.875   | 1.128      | -0.001     | 0.083              | 0.700              | 0.073                    | 0.361              | 1.577              | -2.69           | 0.254              | -0.0020               | 0.0500    | -1.03                     | 0.347     | 0.3109             |           |              |
| 10/16/2013 11:31 0917-173, Ne13_10_16_1131_29_793 | 1      | -0.83    | 1.039      | -0.0580    | 0.074              | 0.762              | 0.070                    | 0.322              | 1.581              | -2.77           | 0.250              | -0.0040               | 0.0400    | -0.55                     | 0.307     | 0.327              |           |              |
| 10/16/2013 11:32 0917-173, Ne13_10_16_1132_30_513 | 1      | 0.18     | 1.100      | -0.036     | 0.083              | 0.745              | 0.070                    | 0.337              | 1.580              | -2.737          | 0.254              | -0.0030               | 0.0500    | -0.42                     | 0.352     | 0.4058             |           |              |
| 10/16/2013 11:33 0917-173, Ne13_10_16_1133_31_273 | 1      | -0.88    | 1.074      | -0.081     | 0.074              | 0.720              | 0.070                    | 0.374              | 1.591              | -2.32           | 0.215              | -0.0060               | 0.0500    | -0.60                     | 0.312     | 0.2479             |           |              |
| 10/16/2013 11:34 0917-173, Ne13_10_16_11          |        |          |            |            |                    |                    |                          |                    |                    |                 |                    |                       |           |                           |           |                    |           |              |

| Location                                          | Disc.  | #        | Start/Stop | Instrument     | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                    |           |              |
|---------------------------------------------------|--------|----------|------------|----------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|--------------------|-----------|--------------|
| Date                                              | Method | Filename | OF         | Acrolein (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur Hexafluoride (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/16/2013 13:09 0917-173, Ne13_10_16_1309_41_601 |        |          | 1          | -0.857         | 1.964              | -0.4120            | 0.0687                   | 0.0037             | 0.0000             | -0.0000         | 0.0000             | -0.0000               | 0.0000    | -0.0000                   | 0.0000    | -0.0000            | 0.0000    | -0.0000      |
| 10/16/2013 13:10 0917-173, Ne13_10_16_1310_44_401 |        |          | 1          | -1.814         | 0.921              | -0.4120            | 0.076                    | 0.0140             | 0.0380             | -0.232          | 0.0800             | -2.613                | 0.12      | 0.00100                   | 0.00500   | -1.206             | 0.313     | 6.981        |
| 10/16/2013 13:11 0917-173, Ne13_10_16_1311_45_062 |        |          | 1          | -1.665         | 0.918              | -0.114             | 0.052                    | 0.0070             | 0.0400             | -0.171          | 0.0620             | -0.420                | 0.08      | -0.00100                  | 0.00500   | -0.263             | 0.276     | 1.112        |
| 10/16/2013 13:12 0917-173, Ne13_10_16_1312_45_992 |        |          | 1          | -1.299         | 0.985              | -0.009             | 0.055                    | 0.139              | 0.0900             | 0.104           | 0.464              | -0.703                | 0.11      | 0.00000                   | 0.00500   | -0.73              | 0.289     | 9.857        |
| 10/16/2013 13:13 0917-173, Ne13_10_16_1313_46_712 |        |          | 1          | -1.55          | 1.256              | -0.010             | 0.088                    | 1.198              | 0.0800             | 0.135           | 1.857              | -2.917                | 0.28      | -0.00700                  | 0.00500   | -0.57              | 0.363     | 31.713       |
| 10/16/2013 13:14 0917-173, Ne13_10_16_1315_46_340 |        |          | 1          | -0.40          | 1.214              | -0.07900           | 0.093                    | 0.239              | 0.0930             | 0.230           | 1.878              | -2.967                | 0.28      | -0.00400                  | 0.00500   | -1.0               | 0.379     | 40.752       |
| 10/16/2013 13:16 0917-173, Ne13_10_16_1316_49_150 |        |          | 1          | 0.288          | 1.197              | -0.026             | 0.087                    | 1.124              | 0.0890             | 0.302           | 1.858              | -2.811                | 0.25      | -0.00900                  | 0.00500   | -0.61              | 0.380     | 35.913       |
| 10/16/2013 13:17 0917-173, Ne13_10_16_1317_49_420 |        |          | 1          | 0.26           | 1.152              | -0.030             | 0.082                    | 1.067              | 0.0920             | 0.259           | 1.823              | -2.368                | 0.22      | -0.00000                  | 0.00500   | -0.57              | 0.363     | 31.713       |
| 10/16/2013 13:19 0917-173, Ne13_10_16_1319_00_620 |        |          | 1          | -0.146         | 1.266              | -0.010             | 0.077                    | 0.928              | 0.0850             | 0.481           | 1.809              | -1.886                | 0.21      | -0.00300                  | 0.00500   | -0.64              | 0.379     | 28.308       |
| 10/16/2013 13:20 0917-173, Ne13_10_16_1320_04_430 |        |          | 1          | -0.73          | 1.254              | -0.004             | 0.076                    | 0.825              | 0.0830             | 0.471           | 1.790              | -1.798                | 0.20      | -0.00600                  | 0.00500   | -1.18              | 0.359     | 27.365       |
| 10/16/2013 13:21 0917-173, Ne13_10_16_1321_04_140 |        |          | 1          | 0.01           | 1.035              | 0.005              | 0.072                    | 0.779              | 0.0740             | 0.321           | 1.586              | -1.942                | 0.19      | -0.00700                  | 0.00500   | -0.49              | 0.336     | 31.106       |
| 10/16/2013 13:22 0917-173, Ne13_10_16_1322_07_270 |        |          | 1          | -1.12          | 1.151              | 0.007              | 0.067                    | 0.759              | 0.0760             | 0.379           | 1.589              | -1.64                 | 0.18      | -0.00200                  | 0.00500   | -0.7               | 0.326     | 17.6         |
| 10/16/2013 13:23 0917-173, Ne13_10_16_1323_04_590 |        |          | 1          | -0.21          | 1.044              | -0.0360            | 0.067                    | 0.732              | 0.0730             | 0.421           | 1.592              | -1.51                 | 0.17      | -0.00700                  | 0.00500   | -0.93              | 0.308     | 25.693       |
| 10/16/2013 13:24 0917-173, Ne13_10_16_1324_05_290 |        |          | 1          | -2.73          | 1.091              | -0.034             | 0.072                    | 0.851              | 0.0790             | 0.399           | 1.598              | -1.988                | 0.21      | 0.00000                   | 0.00500   | -0.60              | 0.338     | 32.727       |
| 10/16/2013 13:25 0917-173, Ne13_10_16_1325_06_130 |        |          | 1          | -2.34          | 1.065              | -0.001             | 0.076                    | 0.926              | 0.0780             | 0.229           | 1.604              | -2.45                 | 0.23      | -0.00500                  | 0.00500   | -1.04              | 0.328     | 33.794       |
| 10/16/2013 13:26 0917-173, Ne13_10_16_1326_06_890 |        |          | 1          | -0.305         | 1.114              | -0.112             | 0.080                    | 0.982              | 0.0790             | 0.221           | 1.613              | -2.783                | 0.24      | -0.00600                  | 0.00500   | -0.51              | 0.327     | 39.725       |
| 10/16/2013 13:27 0917-173, Ne13_10_16_1327_07_651 |        |          | 1          | 0.34           | 1.172              | 0.018              | 0.076                    | 0.993              | 0.0790             | 0.393           | 1.615              | -2.38                 | 0.23      | -0.00500                  | 0.00500   | -0.70              | 0.339     | 37.76        |
| 10/16/2013 13:28 0917-173, Ne13_10_16_1328_08_371 |        |          | 1          | 0.26           | 1.178              | 0.025              | 0.080                    | 1.037              | 0.0810             | 0.303           | 1.633              | -2.223                | 0.23      | -0.00600                  | 0.00500   | -0.66              | 0.341     | 37.429       |
| 10/16/2013 13:29 0917-173, Ne13_10_16_1329_09_101 |        |          | 1          | 1.46           | 1.160              | 0.0140             | 0.077                    | 0.930              | 0.0810             | 0.441           | 1.656              | -2.059                | 0.22      | -0.00600                  | 0.00500   | -0.70              | 0.347     | 34.919       |
| 10/16/2013 13:30 0917-173, Ne13_10_16_1330_09_901 |        |          | 1          | 0.01           | 1.135              | -0.0360            | 0.080                    | 0.940              | 0.0830             | 0.342           | 1.670              | -2.271                | 0.23      | -0.00700                  | 0.00500   | -0.80              | 0.341     | 37.105       |
| 10/16/2013 13:31 0917-173, Ne13_10_16_1331_10_691 |        |          | 1          | -1.51          | 1.152              | -0.002             | 0.083                    | 0.911              | 0.0810             | 0.292           | 1.674              | -2.23                 | 0.23      | -0.00600                  | 0.00500   | -0.87              | 0.355     | 36.482       |
| 10/16/2013 13:32 0917-173, Ne13_10_16_1332_11_411 |        |          | 1          | -0.37          | 1.101              | 0.0740             | 0.080                    | 0.954              | 0.0840             | 0.446           | 1.682              | -2.32                 | 0.23      | -0.00400                  | 0.00500   | -0.86              | 0.328     | 38.219       |
| 10/16/2013 13:33 0917-173, Ne13_10_16_1333_11_211 |        |          | 1          | -0.51          | 1.237              | -0.1140            | 0.080                    | 0.912              | 0.0820             | 0.084           | 1.676              | -2.378                | 0.24      | -0.00500                  | 0.00500   | -0.79              | 0.353     | 38.915       |
| 10/16/2013 13:34 0917-173, Ne13_10_16_1334_12_951 |        |          | 1          | -0.481         | 1.143              | -0.033             | 0.082                    | 0.937              | 0.0840             | 0.212           | 1.667              | -2.497                | 0.25      | -0.00200                  | 0.00500   | -0.54              | 0.332     | 40.764       |
| 10/16/2013 13:35 0917-173, Ne13_10_16_1335_14_701 |        |          | 1          | 1.63           | 1.140              | -0.03400           | 0.082                    | 1.005              | 0.0830             | 0.283           | 1.653              | -2.379                | 0.25      | -0.00400                  | 0.00500   | -0.3               | 0.340     | 40.547       |
| 10/16/2013 13:36 0917-173, Ne13_10_16_1336_15_461 |        |          | 1          | -0.36          | 1.085              | -0.03              | 0.085                    | 0.923              | 0.0820             | 0.299           | 1.646              | -2.26                 | 0.25      | -0.00700                  | 0.00500   | -0.112             | 0.345     | 39.965       |
| 10/16/2013 13:37 0917-173, Ne13_10_16_1337_15_271 |        |          | 1          | -1.115         | 1.127              | 0.024              | 0.081                    | 1.013              | 0.0820             | 0.208           | 1.652              | -2.34                 | 0.25      | -0.00400                  | 0.00500   | -0.89              | 0.341     | 40.397       |
| 10/16/2013 13:38 0917-173, Ne13_10_16_1338_15_941 |        |          | 1          | 0.02           | 1.121              | -0.10900           | 0.084                    | 1.067              | 0.0810             | 0.245           | 1.655              | -2.627                | 0.26      | -0.00300                  | 0.00500   | -0.4               | 0.342     | 19.7         |
| 10/16/2013 13:39 0917-173, Ne13_10_16_1339_16_752 |        |          | 1          | 1.61           | 1.070              | -0.192             | 0.080                    | 0.951              | 0.0810             | 0.362           | 1.634              | -2.33                 | 0.23      | -0.00400                  | 0.00500   | -0.75              | 0.327     | 38.777       |
| 10/16/2013 13:40 0917-173, Ne13_10_16_1340_17_442 |        |          | 1          | 0.234          | 1.140              | -0.0660            | 0.076                    | 0.950              | 0.0800             | 0.375           | 1.634              | -2.2                  | 0.22      | -0.00800                  | 0.00500   | -0.86              | 0.350     | 34.676       |
| 10/16/2013 13:41 0917-173, Ne13_10_16_1341_18_272 |        |          | 1          | -1.84          | 1.124              | 0.031              | 0.075                    | 0.874              | 0.0790             | 0.225           | 1.636              | -1.88                 | 0.22      | -0.00100                  | 0.00500   | -0.84              | 0.340     | 33.603       |
| 10/16/2013 13:42 0917-173, Ne13_10_16_1342_18_982 |        |          | 1          | -0.70          | 1.106              | 0.048              | 0.076                    | 0.824              | 0.0800             | 0.312           | 1.624              | -1.808                | 0.20      | -0.01200                  | 0.00500   | -1.0               | 0.330     | 30.969       |
| 10/16/2013 13:43 0917-173, Ne13_10_16_1343_19_76  |        |          | 1          | -0.58          | 1.074              | 0.071              | 0.076                    | 0.787              | 0.0760             | 0.278           | 1.625              | -1.90                 | 0.18      | -0.00100                  | 0.00500   | -0.61              | 0.326     | 28.121       |
| 10/16/2013 13:44 0917-173, Ne13_10_16_1344_20_532 |        |          | 1          | -2.097         | 1.102              | 0.049              | 0.071                    | 0.724              | 0.0790             | 0.309           | 1.615              | -1.454                | 0.17      | -0.00500                  | 0.00400   | -0.36              | 0.342     | 25.886       |
| 10/16/2013 13:45 0917-173, Ne13_10_16_1345_21_252 |        |          | 1          | -0.366         | 1.027              | 0.004              | 0.069                    | 0.766              | 0.0800             | 0.292           | 1.637              | -1.124                | 0.16      | -0.00800                  | 0.00500   | -0.98              | 0.323     | 34.16        |
| 10/16/2013 13:46 0917-173, Ne13_10_16_1346_22_032 |        |          | 1          | 0.29           | 1.092              | 0.032              | 0.071                    | 0.780              | 0.0810             | 0.247           | 1.653              | -1.207                | 0.16      | -0.00800                  | 0.00500   | -0.39              | 0.335     | 22.124       |
| 10/16/2013 13:47 0917-173, Ne13_10_16_1347_22_792 |        |          | 1          | 1.09           | 1.061              | 0.068              | 0.077                    | 0.800              | 0.0790             | 0.409           | 1.671              | -1.6                  | 0.16      | -0.00100                  | 0.00500   | -1.13              | 0.342     | 22.125       |
| 10/16/2013 13:48 0917-173, Ne13_10_16_1348_23_542 |        |          | 1          | 0.756          | 1.138              | 0.011              | 0.067                    | 0.894              | 0.0820             | 0.406           | 1.686              | -1.16                 | 0.16      | -0.00800                  | 0.00500   | -0.74              | 0.336     | 23.572       |
| 10/16/2013 13:49 0917-173, Ne13_10_16_1349_24_252 |        |          | 1          | -0.89          | 1.145              | 0.038              | 0.068                    | 0.842              | 0.0810             | 0.273           | 1.692              | -1.204                | 0.16      | -0.01200                  | 0.00500   | -0.32              | 0.343     | 23.868       |
| 10/16/2013 13:50 0917-173, Ne13_10_16_1350_25_052 |        |          | 1          | 0.62           | 1.051              | 0.064              | 0.065                    | 0.896              | 0.0840             | 0.259           | 1.698              | -1.08                 | 0.18      | -0.00500                  | 0.00500   | -0.35              | 0.353     | 25.997       |
| 10/16/2013 13:51 0917-173, Ne13_10_16_1351_25_803 |        |          | 1          | -1.75          | 1.140              | 0.101              | 0.069                    | 0.840              | 0.0820             | 0.308           | 1.695              | -1.21                 | 0.17      | -0.00600                  | 0.00500   | -0.89              | 0.329     | 26.098       |
| 10/16/2013 13:52 0917-173, Ne13_10_16_1352_26_603 |        |          | 1          | -1.39          | 1.105              | -0.0230            | 0.074                    | 0.795              | 0.0800             | 0.385           | 1.675              | -1.298                | 0.18      | -0.01000                  | 0.00500   | -0.58              | 0.341     | 25.122       |
| 10/16/2013 13:53 0917-173, Ne13_10_16_1353_27_313 |        |          | 1          | 0.085          | 1.177              | 0.0510             | 0.069                    | 0.885              | 0.0790             | 0.285           | 1.675              | -1.272                | 0.17      | -0.00400                  | 0.00500   | -0.94              | 0.337     | 24.71        |
| 10/16/2013 13:54 0917-173, Ne13_10_16_1354_28_013 |        |          | 1          | 0.428          | 1.152              | 0.048              | 0.072                    | 0.812              | 0.0790             | 0.342           | 1.673              | -1.16                 | 0.16      | -0.00800                  | 0.00500   | -0.34              | 0.345     | 22.547       |
| 10/16/2013 13:55 0917-173, Ne13_10_16_1355_28_823 |        |          | 1          | -0.41          | 1.186              | -0.02900           | 0.066                    | 0.868              | 0.0830             | 0.342           | 1.673              | -1.212                | 0.16      | -0.00900                  | 0.00500   | -0.59              | 0.343     | 22.614       |
| 10/16/2013 13:56 0917-173, Ne13_10_16_1356_29_593 |        |          | 1          | 0.24           | 1.103              | 0.040              | 0.070                    | 0.913              | 0.0820             | 0.463           | 1.681              | -1.194                | 0.16      | -0.00700                  | 0.00500   | -0.41              | 0.336     | 22.947       |
| 10/16/2013 13:57 0917-173, Ne13_10_16_1357_30_313 |        |          | 1          | 0.38           | 1.129              | 0.033              | 0.073                    | 0.864              | 0.0810             | 0.465           | 1.689              | -1.17                 | 0.17      | -0.00900                  | 0.00500   | -0.38              | 0.339     | 24.257       |
| 10/16/2013 13:58 0917-173, Ne13_10_16_1358_31_053 |        |          | 1          | 0.526          | 1.104              | -0.0050            | 0.070                    | 0.963              | 0.0840             | 0.334           | 1.702              | -1.346                | 0.17      | -0.00600                  | 0.00500   | -0.15              | 0.346     | 24.353       |
| 10/16/2013 13:59 0917-173, Ne13_10_16_1359_31_863 |        |          | 1          | -1.75          | 1.263              | 0.059              | 0.070                    | 0.881              | 0.0840             | 0.588           | 1.692              | -1.217                | 0.16      | -0.01200                  | 0.00500   | -0.47              | 0.359     | 23.672       |
| 10/16/2013 14:00 0917-173, Ne13_10_16_1400_32_603 |        |          | 1          | 0.05           | 1.189              | 0.075              | 0.071                    | 0.772              | 0.0830             | 0.407           | 1.680              | -0.990                | 0.16      | -0.00700                  | 0.00500   | -0.55              | 0.355     | 21.242       |
| 10/16/2013 14:01 0917-173, Ne13_10_16_1401_33_233 |        |          | 1          | -1.44          | 1.174              | 0.130              | 0.068                    | 0.740              | 0.0820             | 0.378           | 1.625              | -1.0                  | 0.16      | -0.00700                  | 0.00500   | -0.7               | 0.341     | 23.125       |
| 10/16/2013 14:02 0917-173, Ne13_10_16_1402_34_073 |        |          | 1          | 1.90           | 1.143              | 0.037              | 0.074                    | 0.823              | 0.0790             | 0.477           | 1.642              | -1.528                | 0.174     | -0.00600                  | 0.00500   | -1.0               | 0.342     | 25.609       |
| 10/16/2013 14:03 0917-173, Ne13_10_16_1403_34_794 |        |          | 1          | 0.85           | 1.079              | 0.041              | 0.067                    | 0.882              | 0.0790             | 0.369           | 1.637              | -1.441                | 0.179     | -0.00700                  | 0.00500   | -0.46              | 0.309     | 26.833       |
| 10/16/2013 14:04 0917-173, Ne13_10_16_1404_35_484 |        |          | 1          | 0.64           | 1.046              | 0.0180             | 0.074                    | 0.855              | 0.0780             | 0.420           | 1.632              | -1.521                | 0.187     | -0.00500                  | 0.00500   | -0.98              | 0.316     | 28.028       |
|                                                   |        |          |            |                |                    |                    |                          |                    |                    |                 |                    |                       |           |                           |           |                    |           |              |

| Location                  | Disc.  | #                      | Start/Stop | Instrument     | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                    |           |              |
|---------------------------|--------|------------------------|------------|----------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|--------------------|-----------|--------------|
| Date                      | Method | Filename               | DF         | Acrolein (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur_Hexafluoride (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/16/2013 15:30 0917-173 |        | Ne13_10_16_1530_56_551 | 1          | 5.741          | 2.589              | 0.081              | 0.160                    | 0.030              | 0.110              | 0.980           | 2.017              | -0.251                | 0.248     | -0.0100                   | 0.0000    | 0.00               | 0.79      | 0.306        |
| 10/16/2013 15:31 0917-173 |        | Ne13_10_16_1531_02_751 | 1          | -5.0750        | 2.769              | 0.140              | 0.137                    | -0.1000            | 0.120              | 0.757           | 2.005              | 0.144                 | 0.235     | -0.0150                   | 0.0000    | 1.33               | 0.773     | 0.289        |
| 10/16/2013 15:31 0917-173 |        | Ne13_10_16_1531_08_851 | 1          | 1.025          | 2.881              | -0.0470            | 0.155                    | -0.0200            | 0.100              | 0.693           | 1.976              | -0.014                | 0.256     | -0.0100                   | 0.0000    | -0.956             | 0.84      | 0.267        |
| 10/16/2013 15:31 0917-173 |        | Ne13_10_16_1531_15_041 | 1          | 2.1400         | 2.875              | -0.1850            | 0.148                    | -0.0600            | 0.120              | 0.965           | 1.973              | -0.143                | 0.251     | 0.0070                    | 0.0070    | -0.701             | 0.85      | 0.313        |
| 10/16/2013 15:31 0917-173 |        | Ne13_10_16_1531_21_201 | 1          | 4.478          | 2.749              | -0.1710            | 0.149                    | -0.081             | 0.124              | 0.888           | 1.959              | -0.365                | 0.241     | -0.0080                   | 0.0000    | 1.432              | 0.82      | 0.233        |
| 10/16/2013 15:31 0917-173 |        | Ne13_10_16_1531_27_441 | 1          | -0.116         | 2.719              | 0.135              | 0.154                    | -0.0040            | 0.119              | 1.202           | 1.990              | -0.274                | 0.249     | -0.0100                   | 0.0000    | 0.45               | 0.82      | 0.247        |
| 10/16/2013 15:31 0917-173 |        | Ne13_10_16_1531_33_631 | 1          | 3.6560         | 2.839              | -0.267             | 0.146                    | 0.1530             | 0.110              | 1.340           | 1.970              | 0.04                  | 0.245     | -0.0010                   | 0.0000    | -0.59              | 0.84      | 0.234        |
| 10/16/2013 15:31 0917-173 |        | Ne13_10_16_1531_39_721 | 1          | 5.177          | 2.832              | -0.031             | 0.155                    | -0.0290            | 0.127              | 1.072           | 1.939              | 0.0145                | 0.250     | 0.0145                    | 0.0000    | 0.273              | 0.83      | 0.251        |
| 10/16/2013 15:31 0917-173 |        | Ne13_10_16_1531_45_921 | 1          | -1.44          | 2.646              | -0.284             | 0.155                    | -0.155             | 0.180              | 0.581           | 1.908              | -0.31                 | 0.245     | -0.0020                   | 0.0000    | 0.433              | 0.79      | 0.281        |
| 10/16/2013 15:31 0917-173 |        | Ne13_10_16_1531_52_121 | 1          | 4.149          | 2.865              | 0.110              | 0.152                    | -0.059             | 0.120              | 0.801           | 1.925              | -0.150                | 0.254     | -0.0120                   | 0.0000    | 1.34               | 0.83      | 0.233        |
| 10/16/2013 15:31 0917-173 |        | Ne13_10_16_1531_58_311 | 1          | 3.165          | 2.318              | -0.130             | 0.145                    | 0.145              | 0.180              | 0.507           | 1.876              | -0.544                | 0.226     | 0.0070                    | 0.0000    | -0.07              | 0.75      | 0.245        |
| 10/16/2013 15:32 0917-173 |        | Ne13_10_16_1532_04_511 | 1          | 8.756          | 3.046              | 0.190              | 0.144                    | -0.175             | 0.112              | 1.020           | 1.872              | -0.158                | 0.250     | -0.0090                   | 0.0070    | 0.780              | 0.85      | 0.305        |
| 10/16/2013 15:32 0917-173 |        | Ne13_10_16_1532_10_611 | 1          | -0.998         | 2.720              | 0.1980             | 0.152                    | 0.181              | 0.140              | 0.761           | 1.897              | 0.307                 | 0.248     | -0.0200                   | 0.0000    | -2.33              | 0.84      | 0.223        |
| 10/16/2013 15:32 0917-173 |        | Ne13_10_16_1532_16_801 | 1          | -4.992         | 2.731              | -0.132             | 0.144                    | 0.0110             | 0.180              | 0.988           | 1.854              | -0.114                | 0.242     | -0.0130                   | 0.0000    | -0.149             | 0.82      | 0.211        |
| 10/16/2013 15:32 0917-173 |        | Ne13_10_16_1532_23_091 | 1          | 0.264          | 2.899              | 0.040              | 0.148                    | 0.032              | 0.160              | 0.924           | 1.857              | -0.065                | 0.249     | 0.0020                    | 0.0000    | -0.11              | 0.86      | 0.236        |
| 10/16/2013 15:32 0917-173 |        | Ne13_10_16_1532_29_201 | 1          | -2.467         | 2.915              | 0.167              | 0.153                    | -0.203             | 0.110              | 0.988           | 1.882              | -0.248                | 0.259     | -0.0060                   | 0.0000    | 1.120              | 0.85      | 0.227        |
| 10/16/2013 15:32 0917-173 |        | Ne13_10_16_1532_35_501 | 1          | -0.038         | 2.643              | 0.082              | 0.152                    | -0.211             | 0.114              | 1.178           | 1.831              | -0.486                | 0.245     | -0.0010                   | 0.0000    | 1.091              | 0.79      | 0.217        |
| 10/16/2013 15:32 0917-173 |        | Ne13_10_16_1532_41_501 | 1          | 2.626          | 2.893              | -0.1060            | 0.138                    | -0.167             | 0.170              | 0.348           | 1.846              | 0.001                 | 0.240     | -0.0150                   | 0.0000    | 0.85               | 0.81      | 0.224        |
| 10/16/2013 15:32 0917-173 |        | Ne13_10_16_1532_47_691 | 1          | 0.810          | 2.894              | 0.0920             | 0.146                    | 0.263              | 0.110              | 1.053           | 1.792              | -0.462                | 0.245     | -0.0090                   | 0.0000    | 0.62               | 0.81      | 0.246        |
| 10/16/2013 15:32 0917-173 |        | Ne13_10_16_1532_53_981 | 1          | -4.061         | 3.033              | 0.1660             | 0.144                    | 0.1750             | 0.190              | 0.940           | 1.862              | -0.153                | 0.249     | 0.0050                    | 0.0000    | 0.16               | 0.87      | 0.257        |
| 10/16/2013 15:33 0917-173 |        | Ne13_10_16_1533_00_181 | 1          | 2.275          | 2.932              | 0.002              | 0.153                    | 0.258              | 0.110              | 0.799           | 1.809              | -0.036                | 0.251     | 0.0070                    | 0.0000    | 0.437              | 0.84      | 0.25         |
| 10/16/2013 15:33 0917-173 |        | Ne13_10_16_1533_06_381 | 1          | 8.28           | 2.514              | -0.422             | 0.152                    | 0.1510             | 0.1070             | 1.070           | 1.819              | -1.263                | 0.243     | -0.0090                   | 0.0000    | 1.63               | 0.77      | 0.193        |
| 10/16/2013 15:33 0917-173 |        | Ne13_10_16_1533_12_481 | 1          | 5.00           | 2.561              | 0.245              | 0.154                    | 0.269              | 0.160              | 0.866           | 1.801              | -0.104                | 0.247     | 0.0090                    | 0.0000    | 1.78               | 0.81      | 0.262        |
| 10/16/2013 15:33 0917-173 |        | Ne13_10_16_1533_18_681 | 1          | -5.169         | 2.651              | 0.17               | 0.151                    | 0.248              | 0.170              | 0.864           | 1.787              | -0.030                | 0.246     | -0.0040                   | 0.0000    | 0.622              | 0.81      | 0.218        |
| 10/16/2013 15:33 0917-173 |        | Ne13_10_16_1533_24_881 | 1          | -2.826         | 2.839              | 0.417              | 0.150                    | -0.0160            | 0.110              | 0.640           | 1.863              | -0.322                | 0.248     | -0.0170                   | 0.0000    | -0.3290            | 0.84      | 0.19         |
| 10/16/2013 15:33 0917-173 |        | Ne13_10_16_1533_30_981 | 1          | 5.987          | 2.811              | 0.560              | 0.155                    | -0.276             | 0.138              | 0.879           | 1.978              | -0.285                | 0.254     | -0.0050                   | 0.0000    | -0.900             | 0.85      | 0.25         |
| 10/16/2013 15:33 0917-173 |        | Ne13_10_16_1533_37_271 | 1          | -7.877         | 2.964              | 0.186              | 0.165                    | -0.209             | 0.142              | 0.24            | 1.694              | -0.221                | 0.270     | -0.0120                   | 0.0070    | 0.1780             | 0.90      | 0.087        |
| 10/16/2013 15:33 0917-173 |        | Ne13_10_16_1533_43_371 | 1          | -6.781         | 3.072              | -0.096             | 0.159                    | -0.373             | 0.154              | 0.986           | 1.611              | -0.552                | 0.267     | 0.0000                    | 0.0080    | 0.52               | 0.869     | -0.056       |
| 10/16/2013 15:33 0917-173 |        | Ne13_10_16_1533_49_561 | 1          | -1.80          | 3.319              | -0.072             | 0.175                    | -0.268             | 0.152              | 1.323           | 1.602              | -0.557                | 0.291     | -0.0130                   | 0.0070    | -0.07              | 0.98      | -0.091       |
| 10/16/2013 15:33 0917-173 |        | Ne13_10_16_1534_05_761 | 1          | 1.750          | 2.965              | 0.040              | 0.187                    | 0.080              | 0.148              | 0.947           | 1.537              | -0.295                | 0.245     | -0.0270                   | 0.0000    | 1.39               | 0.93      | -0.058       |
| 10/16/2013 15:34 0917-173 |        | Ne13_10_16_1534_05_961 | 1          | -4.87          | 3.261              | -0.132             | 0.176                    | -0.394             | 0.143              | 1.799           | 1.597              | -0.068                | 0.292     | -0.0210                   | 0.0000    | -0.760             | 0.98      | -0.04        |
| 10/16/2013 15:34 0917-173 |        | Ne13_10_16_1534_08_091 | 1          | -1.8430        | 3.272              | 0.163              | 0.181                    | -0.2430            | 0.142              | 1.445           | 1.695              | 0.3370                | 0.293     | -0.0110                   | 0.0080    | 0.111              | 0.98      | 0.037        |
| 10/16/2013 15:34 0917-173 |        | Ne13_10_16_1534_14_241 | 1          | -2.393         | 3.178              | -0.130             | 0.178                    | -0.160             | 0.141              | 1.160           | 1.638              | -0.319                | 0.294     | -0.0190                   | 0.0000    | -0.14              | 0.98      | 0.114        |
| 10/16/2013 15:34 0917-173 |        | Ne13_10_16_1534_20_441 | 1          | -4.646         | 3.180              | -0.08              | 0.180                    | -0.181             | 0.138              | 0.700           | 1.656              | 0.051                 | 0.293     | -0.0090                   | 0.0070    | -0.16              | 0.96      | 0.069        |
| 10/16/2013 15:34 0917-173 |        | Ne13_10_16_1534_26_631 | 1          | 5.6150         | 3.127              | 0.0630             | 0.178                    | -0.237             | 0.144              | 1.034           | 1.724              | 0.086                 | 0.286     | -0.0100                   | 0.0070    | -1.055             | 0.97      | 0.056        |
| 10/16/2013 15:34 0917-173 |        | Ne13_10_16_1534_32_831 | 1          | -0.617         | 3.387              | 0.179              | 0.164                    | -0.002             | 0.151              | 0.886           | 1.712              | -0.142                | 0.282     | -0.0080                   | 0.0070    | -0.665             | 0.96      | 0.106        |
| 10/16/2013 15:34 0917-173 |        | Ne13_10_16_1534_38_921 | 1          | -1.14          | 3.204              | -0.480             | 0.180                    | -0.100             | 0.145              | 0.803           | 1.720              | 0.022                 | 0.285     | -0.02                     | 0.0000    | 2.34               | 0.98      | 0.155        |
| 10/16/2013 15:34 0917-173 |        | Ne13_10_16_1534_45_121 | 1          | -5.477         | 3.167              | 0.0940             | 0.172                    | -0.224             | 0.144              | 0.22            | 1.781              | 0.16                  | 0.286     | -0.0030                   | 0.0070    | -1.188             | 0.92      | 0.119        |
| 10/16/2013 15:34 0917-173 |        | Ne13_10_16_1534_51_321 | 1          | -2.447         | 3.065              | -0.38              | 0.173                    | -0.139             | 0.141              | 0.829           | 1.785              | -0.45                 | 0.278     | -0.0300                   | 0.0070    | 0.764              | 0.91      | 0.181        |
| 10/16/2013 15:34 0917-173 |        | Ne13_10_16_1534_57_511 | 1          | -1.28          | 2.770              | -0.148             | 0.171                    | -0.310             | 0.142              | 0.797           | 1.854              | -0.236                | 0.267     | -0.0040                   | 0.0070    | -0.01              | 0.89      | 0.206        |
| 10/16/2013 15:35 0917-173 |        | Ne13_10_16_1535_03_811 | 1          | -1.855         | 3.018              | 0.1350             | 0.163                    | 0.021              | 0.130              | 0.851           | 1.893              | 0.0130                | 0.267     | 0.0050                    | 0.0070    | 1.31               | 0.90      | 0.221        |
| 10/16/2013 15:35 0917-173 |        | Ne13_10_16_1535_09_821 | 1          | 0.57           | 3.083              | 0.077              | 0.165                    | -0.127             | 0.150              | 0.756           | 1.890              | -0.25                 | 0.272     | -0.0040                   | 0.0060    | -2.251             | 0.90      | 0.237        |
| 10/16/2013 15:35 0917-173 |        | Ne13_10_16_1535_16_021 | 1          | -2.19          | 3.025              | 0.0020             | 0.170                    | -0.019             | 0.138              | 0.771           | 1.918              | 0.023                 | 0.274     | -0.0190                   | 0.0000    | -0.97              | 0.91      | 0.249        |
| 10/16/2013 15:35 0917-173 |        | Ne13_10_16_1535_22_221 | 1          | -1.4420        | 2.846              | 0.063              | 0.160                    | 0.306              | 0.140              | 0.785           | 1.906              | 0.147                 | 0.263     | -0.0110                   | 0.0070    | 0.57               | 0.88      | 0.255        |
| 10/16/2013 15:35 0917-173 |        | Ne13_10_16_1535_28_421 | 1          | -3.847         | 2.625              | 0.135              | 0.163                    | -0.237             | 0.145              | 0.18            | 1.943              | -0.1210               | 0.256     | -0.0200                   | 0.0000    | -1.79              | 0.84      | 0.258        |
| 10/16/2013 15:35 0917-173 |        | Ne13_10_16_1535_34_611 | 1          | -5.609         | 2.751              | -0.61              | 0.165                    | -0.0800            | 0.140              | 0.953           | 1.603              | -0.718                | 0.262     | -0.0070                   | 0.0070    | 1.20               | 0.88      | 0.308        |
| 10/16/2013 15:35 0917-173 |        | Ne13_10_16_1535_40_711 | 1          | -1.634         | 3.006              | -0.163             | 0.160                    | -0.140             | 0.138              | 0.947           | 1.999              | -0.0110               | 0.266     | -0.0110                   | 0.0000    | -0.171             | 0.89      | 0.242        |
| 10/16/2013 15:35 0917-173 |        | Ne13_10_16_1535_46_901 | 1          | -5.7670        | 3.130              | -0.31              | 0.154                    | -0.2070            | 0.135              | 0.746           | 1.954              | -0.662                | 0.264     | -0.0210                   | 0.0000    | 1.63               | 0.88      | 0.286        |
| 10/16/2013 15:35 0917-173 |        | Ne13_10_16_1535_53_101 | 1          | -3.94          | 3.309              | 0.227              | 0.179                    | -0.0260            | 0.146              | 0.745           | 1.978              | -0.175                | 0.291     | 0.0040                    | 0.0070    | -0.265             | 0.96      | 0.279        |
| 10/16/2013 15:35 0917-173 |        | Ne13_10_16_1535_59_391 | 1          | -0.86          | 2.774              | 0.130              | 0.165                    | -0.0400            | 0.136              | 0.741           | 2.029              | -0.060                | 0.265     | -0.0120                   | 0.0070    | -0.002             | 0.86      | 0.277        |
| 10/16/2013 15:36 0917-173 |        | Ne13_10_16_1536_05_581 | 1          | -2.32          | 3.041              | 0.236              | 0.162                    | -0.020             | 0.138              | 0.23            | 1.968              | 0.12                  | 0.269     | 0.0010                    | 0.0000    | 0.36               | 0.91      | 0.286        |
| 10/16/2013 15:36 0917-173 |        | Ne13_10_16_1536_11_681 | 1          | 2.763          | 2.928              | -0.002             | 0.150                    | -0.0670            | 0.145              | 0.511           | 2.020              | -0.234                | 0.251     | -0.0240                   | 0.0070    | -0.05              | 0.86      | 0.248        |
| 10/16/2013 15:36 0917-173 |        | Ne13_10_16_1536_17_881 | 1          | -1.853         | 3.131              | 0.309              | 0.153                    | -0.212             | 0.148              | 0.829           | 1.970              | 0.352                 | 0.258     | -0.0130                   | 0.0000    | -0.823             | 0.88      | 0.268        |
| 10/16/2013 15:36 0917-173 |        | Ne13_10_16_1536_24_081 | 1          | -7.6880        | 3.108              | -0.1550            | 0.166                    | -0.125             | 0.139              | 0.691           | 2.027              | -0.404                | 0.270     | -0.0140                   | 0.0000    | 0.30               | 0.90      | 0.311        |
| 10/16/2013 15:36 0917-173 |        | Ne13_10_16_1536_30_271 | 1          | -5.122         |                    |                    |                          |                    |                    |                 |                    |                       |           |                           |           |                    |           |              |

| Location                  | Disc.  | #                      | Start/Stop | Instrument     | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                    |           |             |
|---------------------------|--------|------------------------|------------|----------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|--------------------|-----------|-------------|
| Date                      | Method | Filename               | DF         | Acrolein (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur Hexafluoride (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) | pinene (ug) |
| 10/14/2013 12:14 0917-173 | Stop   | 10/14_1214_1214_09_01  | 1          | -1.8           | 1.2                | 0.054              | 0.068                    | -0.25              | 1.31               | 0.0420          | 0.0950             | -0.374                | 0.110     | 0.052                     | 0.529     | 0.71               | 0.358     | -1.643      |
| 10/14/2013 12:14 0917-173 |        | 10/14_1214_1214_32_611 | 1          | -2.3           | 1.2                | 0.111              | 0.071                    | -0.24              | 1.36               | 0.1310          | 0.0830             | -0.0380               | 0.116     | 0.042                     | 0.546     | 1.34               | 0.372     | -1.752      |
| 10/14/2013 12:14 0917-173 |        | 10/14_1214_1214_51_221 | 1          | 0.5            | 1.3                | 0.1070             | 0.070                    | -0.35              | 1.38               | 0.042           | 0.1030             | -0.234                | 0.113     | 0.045                     | 0.552     | 0.372              | 0.379     | -1.747      |
| 10/14/2013 12:15 0917-173 |        | 10/14_1215_1215_06_721 | 1          | -2.8           | 1.2                | 0.158              | 0.073                    | -0.47              | 1.40               | -0.001          | 0.0940             | -0.183                | 0.116     | 0.055                     | 0.559     | 0.076              | 0.377     | -1.795      |
| 10/14/2013 12:15 0917-173 |        | 10/14_1215_1215_36_311 | 1          | 0.1            | 1.3                | 0.226              | 0.066                    | -0.39              | 1.40               | 0.099           | 0.0920             | -0.0220               | 0.114     | 0.048                     | 0.559     | 0.171              | 0.380     | -1.795      |
| 10/14/2013 12:15 0917-173 |        | 10/14_1215_1215_46_821 | 1          | -3.6           | 1.3                | 0.1260             | 0.074                    | -0.39              | 1.40               | 0.0100          | 0.0900             | -0.190                | 0.118     | 0.051                     | 0.560     | 0.388              | 0.376     | -1.797      |
| 10/14/2013 12:16 0917-173 |        | 10/14_1216_1216_05_251 | 1          | -0.4           | 1.3                | -0.036             | 0.070                    | -0.43              | 1.40               | -0.0090         | 0.0870             | -0.311                | 0.115     | 0.041                     | 0.558     | 1.02               | 0.367     | -1.784      |
| 10/14/2013 12:16 0917-173 |        | 10/14_1216_1216_25_051 | 1          | -0.8           | 1.3                | -0.0750            | 0.072                    | -0.40              | 1.40               | 0.0500          | 0.0900             | -0.0460               | 0.117     | 0.058                     | 0.567     | 0.039              | 0.386     | -1.785      |
| 10/14/2013 12:16 0917-173 |        | 10/14_1216_1216_42_401 | 1          | -0.8           | 1.2                | -0.028             | 0.069                    | -0.48              | 1.41               | -0.179          | 0.0930             | 0.052                 | 0.113     | 0.047                     | 0.561     | 0.533              | 0.369     | -1.804      |
| 10/14/2013 12:17 0917-173 |        | 10/14_1217_1217_01_001 | 1          | -0.1           | 1.3                | 0.1820             | 0.065                    | -0.41              | 1.40               | 0.270           | 0.0830             | -0.163                | 0.109     | 0.048                     | 0.562     | 0.492              | 0.367     | -1.772      |
| 10/14/2013 12:17 0917-173 | Stop   | 10/14_1217_1217_19_511 | 1          | -1.6           | 1.4                | 0.140              | 0.070                    | -0.43              | 1.40               | -0.0580         | 0.0910             | 0.239                 | 0.119     | 0.052                     | 0.561     | 0.354              | 0.401     | -1.789      |
| 10/14/2013 12:17 0917-173 |        | 10/14_1217_1217_36_001 | 1          | 1.4            | 1.2                | 0.064              | 0.067                    | -0.32              | 1.41               | 0.143           | 0.0920             | -0.128                | 0.101     | 0.057                     | 0.561     | 1.27               | 0.386     | -1.787      |
| 10/14/2013 12:17 0917-173 |        | 10/14_1217_1217_56_641 | 1          | 0.7            | 1.3                | 0.142              | 0.073                    | -0.44              | 1.40               | 0.145           | 0.0930             | -0.099                | 0.118     | 0.053                     | 0.563     | 1.23               | 0.382     | -1.806      |
| 10/14/2013 12:18 0917-173 |        | 10/14_1218_1218_15_151 | 1          | -2.6           | 1.3                | 0.0090             | 0.065                    | -0.47              | 1.41               | -0.0490         | 0.0920             | -0.0560               | 0.112     | 0.054                     | 0.561     | 1.65               | 0.370     | -1.808      |
| 10/14/2013 12:18 0917-173 |        | 10/14_1218_1218_36_681 | 1          | -1.1           | 1.2                | 0.157              | 0.067                    | -0.42              | 1.40               | 0.0800          | 0.0890             | -0.148                | 0.115     | 0.044                     | 0.561     | 0.764              | 0.365     | -1.798      |
| 10/14/2013 12:18 0917-173 |        | 10/14_1218_1218_52_291 | 1          | 0.5            | 1.3                | 0.2190             | 0.068                    | -0.65              | 1.41               | 0.079           | 0.0860             | -0.300                | 0.115     | 0.053                     | 0.561     | 0.411              | 0.384     | -1.813      |
| 10/14/2013 12:19 0917-173 |        | 10/14_1219_1219_10_741 | 1          | 3.8            | 1.2                | -0.0250            | 0.066                    | -0.46              | 1.40               | 0.137           | 0.1010             | -0.116                | 0.099     | 0.050                     | 0.561     | 0.78               | 0.361     | -1.797      |
| 10/14/2013 12:19 0917-173 |        | 10/14_1219_1219_29_311 | 1          | 0.6            | 1.3                | 0.113              | 0.071                    | -0.42              | 1.40               | 0.0220          | 0.0960             | -0.045                | 0.116     | 0.047                     | 0.562     | 0.460              | 0.369     | -1.822      |
| 10/14/2013 12:19 0917-173 |        | 10/14_1219_1219_47_481 | 1          | 1.5            | 1.3                | 0.1750             | 0.067                    | -0.48              | 1.41               | 0.025           | 0.1010             | 0.122                 | 0.111     | 0.049                     | 0.563     | 0.736              | 0.367     | -1.793      |
| 10/14/2013 12:20 0917-173 |        | 10/14_1220_1220_06_371 | 1          | 1.1            | 1.3                | 0.051              | 0.069                    | -0.46              | 1.41               | -0.179          | 0.0920             | -0.148                | 0.115     | 0.041                     | 0.561     | 0.543              | 0.388     | -1.814      |
| 10/14/2013 12:20 0917-173 | Stop   | 10/14_1220_1220_14_991 | 1          | -1.7           | 1.3                | -0.052             | 0.070                    | -0.32              | 1.41               | 0.0240          | 0.0950             | -0.002                | 0.115     | 0.051                     | 0.559     | 0.63               | 0.389     | -1.81       |
| 10/14/2013 12:20 0917-173 |        | 10/14_1220_1220_46_481 | 1          | -1.1           | 1.2                | 0.029              | 0.066                    | -0.39              | 1.41               | -0.283          | 0.0880             | -0.053                | 0.099     | 0.052                     | 0.562     | 0.84               | 0.366     | -1.83       |
| 10/14/2013 12:21 0917-173 |        | 10/14_1221_1221_01_501 | 1          | -3.3           | 1.4                | 0.108              | 0.067                    | -0.54              | 1.41               | 0.153           | 0.1020             | 0.129                 | 0.116     | 0.054                     | 0.566     | -0.209             | 0.401     | -1.812      |
| 10/14/2013 12:21 0917-173 |        | 10/14_1221_1221_20_611 | 1          | -2.6           | 1.2                | 0.032              | 0.070                    | -0.42              | 1.41               | 0.0010          | 0.0930             | -0.204                | 0.113     | 0.055                     | 0.560     | 1.524              | 0.367     | -1.816      |
| 10/14/2013 12:21 0917-173 |        | 10/14_1221_1221_39_101 | 1          | 0.3            | 1.3                | 0.1570             | 0.071                    | -0.37              | 1.41               | 0.117           | 0.0810             | -0.183                | 0.117     | 0.043                     | 0.560     | -0.12              | 0.385     | -1.829      |
| 10/14/2013 12:21 0917-173 |        | 10/14_1221_1221_57_711 | 1          | -0.3           | 1.2                | -0.036             | 0.071                    | -0.30              | 1.41               | 0.176           | 0.0910             | -0.060                | 0.114     | 0.053                     | 0.562     | 0.269              | 0.382     | -1.793      |
| 10/14/2013 12:22 0917-173 |        | 10/14_1222_1222_16_192 | 1          | -1.8           | 1.3                | -0.029             | 0.071                    | -0.34              | 1.40               | -0.0220         | 0.0910             | -0.233                | 0.118     | 0.048                     | 0.564     | -0.07              | 0.395     | -1.844      |
| 10/14/2013 12:22 0917-173 |        | 10/14_1222_1222_34_662 | 1          | 0.4            | 1.3                | 0.082              | 0.066                    | -0.49              | 1.40               | 0.0210          | 0.0830             | -0.037                | 0.111     | 0.041                     | 0.562     | 0.3810             | 0.376     | -1.831      |
| 10/14/2013 12:22 0917-173 |        | 10/14_1222_1222_54_282 | 1          | 0.7            | 1.2                | 0.088              | 0.070                    | -0.42              | 1.40               | 0.1040          | 0.0880             | -0.119                | 0.112     | 0.052                     | 0.562     | 0.512              | 0.382     | -1.808      |
| 10/14/2013 12:23 0917-173 |        | 10/14_1223_1223_11_782 | 1          | -1.6           | 1.2                | 0.2190             | 0.069                    | -0.40              | 1.40               | 0.0810          | 0.1030             | -0.065                | 0.112     | 0.048                     | 0.563     | 0.358              | 0.357     | -1.827      |
| 10/14/2013 12:24 0917-173 | Stop   | 10/14_1224_1224_45_810 | 1          | 1.43           | 0.843              | -0.1590            | 0.138                    | 91.1               | 0.748              | -0.045          | 0.0910             | 1.166                 | 0.182     | 2.88                      | 0.080     | 0.720              | 0.286     | 0.594       |
| 10/14/2013 12:45 0917-173 |        | 10/14_1245_1245_46_590 | 1          | -0.08          | 0.808              | -0.108             | 0.143                    | 94.2               | 0.781              | -0.091          | 0.0900             | 1.24                  | 0.188     | 2.91                      | 0.090     | 0.576              | 0.287     | 0.621       |
| 10/14/2013 12:46 0917-173 |        | 10/14_1246_1246_07_290 | 1          | -0.65          | 0.885              | -0.135             | 0.145                    | 96.0               | 0.797              | -0.091          | 0.0940             | 1.24                  | 0.193     | 2.91                      | 0.090     | 0.576              | 0.287     | 0.621       |
| 10/14/2013 12:47 0917-173 |        | 10/14_1247_1247_48_200 | 1          | -0.55          | 0.783              | -0.0220            | 0.147                    | 96.7               | 0.802              | -0.007          | 0.0940             | 1.24                  | 0.193     | 2.90                      | 0.090     | 0.395              | 0.288     | 0.623       |
| 10/14/2013 12:48 0917-173 |        | 10/14_1248_1248_48_990 | 1          | 0.74           | 0.816              | -0.202             | 0.145                    | 97.4               | 0.803              | 0.1040          | 0.0950             | 1.35                  | 0.189     | 2.91                      | 0.090     | 0.346              | 0.293     | 0.601       |
| 10/14/2013 12:49 0917-173 |        | 10/14_1249_1249_49_710 | 1          | -0.18          | 0.826              | -0.2070            | 0.150                    | 98                 | 0.803              | 0.006           | 0.1010             | 1.23                  | 0.193     | 2.91                      | 0.090     | 0.722              | 0.286     | 0.613       |
| 10/14/2013 12:50 0917-173 |        | 10/14_1250_1250_50_530 | 1          | -0.15          | 0.866              | -0.152             | 0.155                    | 98                 | 0.812              | 0.007           | 0.0950             | 1.12                  | 0.201     | 2.92                      | 0.090     | 0.302              | 0.289     | 0.609       |
| 10/14/2013 12:51 0917-173 |        | 10/14_1251_1251_51_330 | 1          | 1.22           | 0.838              | -0.293             | 0.153                    | 99                 | 0.823              | 0.050           | 0.0980             | 1.19                  | 0.196     | 2.91                      | 0.090     | 0.684              | 0.293     | 0.6         |
| 10/14/2013 12:52 0917-173 |        | 10/14_1252_1252_52_020 | 1          | 0.37           | 0.817              | -0.136             | 0.150                    | 99                 | 0.822              | 0.1180          | 0.0970             | 1.24                  | 0.198     | 2.91                      | 0.090     | 0.439              | 0.287     | 0.626       |
| 10/14/2013 12:53 0917-173 |        | 10/14_1253_1253_53_871 | 1          | 0.63           | 0.858              | -0.129             | 0.148                    | 99                 | 0.824              | -0.005          | 0.101              | 1.27                  | 0.199     | 2.91                      | 0.090     | 0.384              | 0.284     | 0.624       |
| 10/14/2013 12:54 0917-173 |        | 10/14_1254_1254_54_381 | 1          | 0.72           | 0.868              | -0.222             | 0.154                    | 100                | 0.816              | -0.037          | 0.0990             | 1.34                  | 0.204     | 2.91                      | 0.090     | 0.430              | 0.288     | 0.603       |
| 10/14/2013 12:55 0917-173 | Stop   | 10/14_1255_1255_54_371 | 1          | 1.26           | 0.880              | -0.218             | 0.154                    | 100                | 0.825              | 0.002           | 0.0920             | 1.27                  | 0.199     | 2.92                      | 0.090     | 1.200              | 0.290     | 0.607       |
| 10/14/2013 12:56 0917-173 |        | 10/14_1256_1256_55_131 | 1          | -0.23          | 0.790              | -0.127             | 0.152                    | 100                | 0.827              | 0.012           | 0.0990             | 1.41                  | 0.198     | 2.91                      | 0.090     | 0.526              | 0.281     | 0.606       |
| 10/14/2013 12:57 0917-173 |        | 10/14_1257_1257_56_961 | 1          | -0.17          | 0.820              | -0.157             | 0.160                    | 100                | 0.818              | 0.113           | 0.096              | 1.34                  | 0.196     | 2.91                      | 0.090     | 0.821              | 0.286     | 0.598       |
| 10/14/2013 13:01 0917-173 |        | 10/14_1301_1301_13_152 | 1          | -2.62          | 1.645              | -3.43              | 0.091                    | 2.16               | 0.257              | 0.139           | 1.80               | -                     |           |                           |           |                    |           |             |

| Location                                          | Disc.  | #        | Start/Stop | Instrument     | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                     |           |             |
|---------------------------------------------------|--------|----------|------------|----------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|---------------------|-----------|-------------|
| Date                                              | Method | Filename | DF         | Acrolein (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur Hexafluoride (ppm) | SEC (ppm) | acetaldedhyde (ppm) | SEC (ppm) | pinene (pp) |
| 10/14/2013 15:25 0917-173, No13_10_14_1525_21_181 | 1      | 2.71     | 2.1950     | 1.489          | 0.645              | 0.084              | 2.68                     | 0.246              | 0.14               | 1.82            | -0.769             | 0.138                 | 0.00400   | 0.01200                   | -1.01     | 0.436               | 6.258     |             |
| 10/14/2013 15:26 0917-173, No13_10_14_1526_23_993 | 1      | -1.947   | -1.7050    | 1.558          | 0.720              | 0.081              | 2.70                     | 0.234              | 0.10               | 1.80            | -0.7300            | 0.138                 | 0.00400   | 0.01200                   | 0.68      | 0.447               | 6.196     |             |
| 10/14/2013 15:27 0917-173, No13_10_14_1527_24_733 | 1      | -1.4410  | 1.420      | 0.093          | 0.080              | 0.560              | 2.56                     | 0.232              | 0.24               | 1.82            | -0.748             | 0.132                 | 0.00500   | 0.01200                   | -0.781    | 0.435               | 6.097     |             |
| 10/14/2013 15:28 0917-173, No13_10_14_1528_26_404 | 1      | -2.988   | 1.441      | 0.73           | 0.084              | 0.71               | 2.71                     | 0.235              | 0.17               | 1.81            | -0.599             | 0.136                 | 0.00100   | 0.01200                   | -0.432    | 0.434               | 6.122     |             |
| 10/14/2013 15:30 0917-173, No13_10_14_1530_26_944 | 1      | -1.505   | 1.503      | 0.701          | 0.081              | 0.86               | 2.86                     | 0.252              | 0.06               | 1.80            | -0.83900           | 0.137                 | 0.00000   | 0.0120                    | -0.62     | 0.435               | 6.297     |             |
| 10/14/2013 15:31 0917-173, No13_10_14_1531_27_714 | 1      | -2.387   | 1.553      | 0.564          | 0.087              | 0.778              | 2.62                     | 0.200              | 0.00               | 1.77            | -0.909             | 0.144                 | 0.00300   | 0.0130                    | -0.833    | 0.461               | 6.37      |             |
| 10/14/2013 15:32 0917-173, No13_10_14_1532_28_404 | 1      | -3.5440  | 1.550      | 0.515          | 0.078              | 2.57               | 2.53                     | 0.24               | 0.80               | 1.80            | -0.9400            | 0.140                 | 0.00400   | 0.0130                    | -0.4640   | 0.453               | 6.377     |             |
| 10/14/2013 15:33 0917-173, No13_10_14_1533_29_184 | 1      | -5.288   | 1.536      | 0.560          | 0.080              | 2.75               | 2.43                     | 0.03               | 0.80               | 1.80            | -0.866             | 0.140                 | 0.00300   | 0.01200                   | -0.87     | 0.452               | 6.351     |             |
| 10/14/2013 15:34 0917-173, No13_10_14_1534_29_994 | 1      | -1.594   | 1.581      | 0.590          | 0.081              | 2.79               | 2.26                     | 0.26               | 1.80               | 1.80            | -0.581             | 0.141                 | 0.00100   | 0.01200                   | -1.204    | 0.456               | 6.394     |             |
| 10/14/2013 15:35 0917-173, No13_10_14_1535_30_714 | 1      | -1.822   | 1.489      | 0.608          | 0.080              | 2.77               | 2.41                     | 0.00               | 1.79               | 1.80            | -0.664             | 0.136                 | 0.00200   | 0.0120                    | -0.93     | 0.435               | 6.341     |             |
| 10/14/2013 15:36 0917-173, No13_10_14_1536_31_404 | 1      | -2.075   | 1.530      | 0.686          | 0.085              | 2.93               | 2.53                     | 0.10               | 1.80               | 1.82            | -0.666             | 0.142                 | 0.00400   | 0.0120                    | -0.705    | 0.449               | 6.499     |             |
| 10/14/2013 15:37 0917-173, No13_10_14_1537_32_154 | 1      | -3.87800 | 1.511      | 0.621          | 0.084              | 2.83               | 2.53                     | 0.21               | 1.80               | 1.80            | -0.7850            | 0.141                 | 0.00200   | 0.0120                    | -0.49     | 0.445               | 6.54      |             |
| 10/14/2013 15:38 0917-173, No13_10_14_1538_32_914 | 1      | -3.430   | 1.548      | 0.517          | 0.081              | 2.96               | 2.64                     | 0.09               | 1.80               | 1.80            | -0.578             | 0.139                 | 0.00000   | 0.0130                    | -0.82     | 0.448               | 6.621     |             |
| 10/14/2013 15:39 0917-173, No13_10_14_1539_33_524 | 1      | -1.184   | 1.546      | 0.532          | 0.085              | 2.82               | 2.68                     | 0.08               | 1.79               | 1.81            | -0.666             | 0.144                 | 0.00100   | 0.0130                    | -1.380    | 0.266               | 6.58      |             |
| 10/14/2013 15:40 0917-173, No13_10_14_1540_34_305 | 1      | -3.494   | 1.498      | 0.564          | 0.083              | 2.84               | 2.63                     | 0.19               | 1.80               | 1.80            | -0.8440            | 0.141                 | 0.00000   | 0.0120                    | -0.93     | 0.450               | 6.451     |             |
| 10/14/2013 15:41 0917-173, No13_10_14_1541_35_025 | 1      | -3.315   | 1.550      | 0.564          | 0.082              | 2.77               | 2.56                     | 0.03               | 1.81               | 1.80            | -0.8440            | 0.140                 | 0.00000   | 0.0130                    | -0.940    | 0.452               | 6.374     |             |
| 10/14/2013 15:42 0917-173, No13_10_14_1542_35_845 | 1      | -0.858   | 1.530      | 0.570          | 0.080              | 2.74               | 2.40                     | 0.07               | 1.82               | 1.80            | -0.8670            | 0.137                 | 0.00000   | 0.01200                   | -0.89     | 0.442               | 6.286     |             |
| 10/14/2013 15:43 0917-173, No13_10_14_1543_36_595 | 1      | -3.390   | 1.474      | 0.609          | 0.081              | 2.96               | 2.31                     | 0.12               | 1.83               | 1.85            | -0.975             | 0.135                 | 0.00300   | 0.01100                   | -0.52     | 0.430               | 6.361     |             |
| 10/14/2013 15:44 0917-173, No13_10_14_1544_37_325 | 1      | -3.220   | 1.520      | 0.696          | 0.082              | 2.97               | 2.30                     | 0.15               | 1.81               | 1.80            | -0.8060            | 0.137                 | 0.00200   | 0.0110                    | -0.790    | 0.440               | 6.381     |             |
| 10/14/2013 15:45 0917-173, No13_10_14_1545_38_135 | 1      | -2.169   | 1.561      | 0.591          | 0.079              | 2.86               | 2.35                     | 0.31               | 1.81               | 1.80            | -0.82100           | 0.136                 | 0.00700   | 0.01100                   | -0.83     | 0.445               | 6.395     |             |
| 10/14/2013 15:46 0917-173, No13_10_14_1546_38_875 | 1      | -3.178   | 1.585      | 0.640          | 0.052              | 2.89               | 2.42                     | 0.22               | 1.85               | 1.80            | -0.740             | 0.144                 | 0.00100   | 0.01100                   | -0.76     | 0.453               | 6.599     |             |
| 10/14/2013 15:47 0917-173, No13_10_14_1547_39_575 | 1      | -3.320   | 1.549      | 0.585          | 0.084              | 3.01               | 2.49                     | 0.39               | 1.83               | 1.83            | -0.597             | 0.143                 | 0.00000   | 0.01200                   | -1.160    | 0.447               | 6.619     |             |
| 10/14/2013 15:48 0917-173, No13_10_14_1548_40_315 | 1      | -2.902   | 1.579      | 0.575          | 0.084              | 2.93               | 2.56                     | 0.27               | 1.78               | 1.78            | -0.664             | 0.144                 | 0.00100   | 0.0130                    | -1.036    | 0.466               | 6.702     |             |
| 10/14/2013 15:49 0917-173, No13_10_14_1549_41_135 | 1      | -3.028   | 1.573      | 0.493          | 0.085              | 2.88               | 2.61                     | 0.27               | 1.78               | 1.78            | -0.636             | 0.144                 | 0.00600   | 0.0130                    | -1.372    | 0.449               | 6.73      |             |
| 10/14/2013 15:50 0917-173, No13_10_14_1550_42_845 | 1      | -1.467   | 1.536      | 0.616          | 0.084              | 2.97               | 2.57                     | 0.29               | 1.81               | 1.82            | -0.567             | 0.141                 | 0.00100   | 0.0120                    | -1.03     | 0.452               | 6.597     |             |
| 10/14/2013 15:51 0917-173, No13_10_14_1551_42_616 | 1      | -1.084   | 1.528      | 0.587          | 0.082              | 2.61               | 2.39                     | 0.14               | 1.82               | 1.82            | -0.8250            | 0.140                 | 0.00100   | 0.01100                   | -0.839    | 0.451               | 6.403     |             |
| 10/14/2013 15:52 0917-173, No13_10_14_1552_43_326 | 1      | -2.208   | 1.520      | 0.634          | 0.081              | 2.71               | 2.36                     | 0.29               | 1.82               | 1.82            | -0.827             | 0.137                 | 0.00100   | 0.01100                   | -0.71     | 0.449               | 6.438     |             |
| 10/14/2013 15:53 0917-173, No13_10_14_1553_44_006 | 1      | -2.5970  | 1.498      | 0.578          | 0.083              | 2.78               | 2.39                     | 0.12               | 1.82               | 1.80            | -0.659             | 0.140                 | 0.00200   | 0.01100                   | -1.061    | 0.455               | 6.546     |             |
| 10/14/2013 15:54 0917-173, No13_10_14_1554_44_986 | 1      | -1.906   | 1.563      | 0.663          | 0.084              | 2.94               | 2.52                     | 0.26               | 1.78               | 1.78            | -0.599             | 0.140                 | 0.00100   | 0.0120                    | -0.92     | 0.457               | 6.597     |             |
| 10/14/2013 15:55 0917-173, No13_10_14_1555_45_656 | 1      | -3.238   | 1.559      | 0.776          | 0.083              | 2.77               | 2.59                     | 0.20               | 1.78               | 1.78            | -0.678             | 0.142                 | 0.00100   | 0.0130                    | -1.126    | 0.454               | 6.653     |             |
| 10/14/2013 15:56 0917-173, No13_10_14_1556_46_316 | 1      | -5.7000  | 1.603      | 0.605          | 0.086              | 2.83               | 2.54                     | 0.08               | 1.79               | 1.79            | -0.888             | 0.146                 | 0.00100   | 0.0130                    | -0.59     | 0.463               | 6.691     |             |
| 10/14/2013 15:57 0917-173, No13_10_14_1557_47_106 | 1      | -0.431   | 1.611      | 0.611          | 0.084              | 2.92               | 2.48                     | 0.17               | 1.80               | 1.80            | -0.61300           | 0.143                 | 0.00100   | 0.0120                    | -0.64     | 0.447               | 6.736     |             |
| 10/14/2013 15:58 0917-173, No13_10_14_1558_47_826 | 1      | -3.497   | 1.534      | 0.509          | 0.085              | 2.79               | 2.51                     | 0.15               | 1.79               | 1.79            | -0.686             | 0.141                 | 0.00100   | 0.01200                   | -0.58     | 0.452               | 6.748     |             |
| 10/14/2013 15:59 0917-173, No13_10_14_1559_48_586 | 1      | -2.491   | 1.576      | 0.559          | 0.088              | 2.80               | 2.64                     | 0.26               | 1.79               | 1.79            | -0.869             | 0.145                 | 0.00200   | 0.0130                    | -1.001    | 0.465               | 6.724     |             |
| 10/14/2013 16:00 0917-173, No13_10_14_1600_49_366 | 1      | -2.5430  | 1.540      | 0.430          | 0.086              | 2.53               | 2.53                     | 0.11               | 1.78               | 1.78            | -0.9990            | 0.144                 | 0.00100   | 0.0120                    | -0.71     | 0.452               | 6.564     |             |
| 10/14/2013 16:01 0917-173, No13_10_14_1601_50_106 | 1      | -1.950   | 1.614      | 0.614          | 0.083              | 2.98               | 2.35                     | 0.32               | 1.81               | 1.81            | -0.890             | 0.143                 | 0.00100   | 0.0120                    | -0.450    | 0.469               | 6.397     |             |
| 10/14/2013 16:02 0917-173, No13_10_14_1602_50_526 | 1      | -3.018   | 1.376      | 0.392          | 0.080              | 2.32               | 2.27                     | 0.30               | 1.84               | 1.84            | -0.776             | 0.134                 | 0.00000   | 0.01100                   | -0.92     | 0.418               | 6.12      |             |
| 10/14/2013 16:03 0917-173, No13_10_14_1603_51_667 | 1      | -0.801   | 1.484      | 0.542          | 0.082              | 2.37               | 2.18                     | 0.22               | 1.83               | 1.83            | -0.674             | 0.137                 | 0.00100   | 0.01100                   | -0.96     | 0.444               | 5.944     |             |
| 10/14/2013 16:04 0917-173, No13_10_14_1604_52_377 | 1      | -1.162   | 1.526      | 0.620          | 0.081              | 2.39               | 2.09                     | 0.21               | 1.84               | 1.84            | -0.780             | 0.138                 | 0.00100   | 0.01100                   | -0.869    | 0.459               | 5.795     |             |
| 10/14/2013 16:05 0917-173, No13_10_14_1605_53_187 | 1      | -0.236   | 1.434      | 0.489          | 0.078              | 2.30               | 1.98                     | 0.17               | 1.85               | 1.85            | -0.7620            | 0.132                 | 0.00100   | 0.01000                   | -0.52     | 0.425               | 5.651     |             |
| 10/14/2013 16:06 0917-173, No13_10_14_1606_53_907 | 1      | -2.058   | 1.485      | 0.557          | 0.076              | 2.25               | 2.00                     | 0.37               | 1.84               | 1.84            | -0.478             | 0.130                 | 0.00200   | 0.00900                   | -0.809    | 0.423               | 5.548     |             |
| 10/14/2013 16:07 0917-173, No13_10_14_1607_54_637 | 1      | -1.648   | 1.452      | 0.478          | 0.079              | 2.46               | 2.01                     | 0.30               | 1.86               | 1.86            | -0.615             | 0.132                 | 0.00400   | 0.00900                   | -0.71     | 0.435               | 5.465     |             |
| 10/14/2013 16:08 0917-173, No13_10_14_1608_55_427 | 1      | -2.215   | 1.566      | 0.683          | 0.083              | 2.53               | 2.12                     | 0.23               | 1.84               | 1.84            | -0.61300           | 0.131                 | 0.00100   | 0.01100                   | -0.408    | 0.267               | 5.451     |             |
| 10/14/2013 16:09 0917-173, No13_10_14_1609_56_147 | 1      | -1.969   | 1.368      | 0.732          | 0.078              | 2.40               | 2.23                     | 0.28               | 1.84               | 1.84            | -0.530             | 0.129                 | 0.00100   | 0.01100                   | -1.015    | 0.409               | 5.405     |             |
| 10/14/2013 16:10 0917-173, No13_10_14_1610_56_957 | 1      | -2.966   | 1.483      | 0.88           | 0.079              | 2.24               | 2.23                     | 0.28               | 1.86               | 1.86            | -0.712             | 0.132                 | 0.0       | 0.01100                   | -0.37     | 0.428               | 5.41      |             |
| 10/14/2013 16:11 0917-173, No13_10_14_1611_57_677 | 1      | -2.3950  | 1.496      | 0.829          | 0.082              | 2.32               | 2.21                     | 0.32               | 1.85               | 1.85            | -0.113             | 0.130                 | 0.00100   | 0.01200                   | -0.402    | 0.417               | 5.417     |             |
| 10/14/2013 16:12 0917-173, No13_10_14_1612_58_447 | 1      | -1.2510  | 1.473      | 0.787          | 0.077              | 2.22               | 2.18                     | 0.33               | 1.85               | 1.85            | -0.6950            | 0.132                 | 0.00400   | 0.01200                   | -0.85     | 0.427               | 5.453     |             |
| 10/14/2013 16:13 0917-173, No13_10_14_1613_59_217 | 1      | -2.001   | 1.499      | 0.723          | 0.083              | 2.16               | 2.27                     | 0.47               | 1.83               | 1.83            | -0.899             | 0.139                 | 0.00100   | 0.0120                    | -0.373    | 0.442               | 5.559     |             |
| 10/14/2013 16:14 0917-173, No13_10_14_1614_59_927 | 1      | -4.413   | 1.580      | 0.662          | 0.084              | 2.25               | 2.48                     | 0.50               | 1.85               | 1.85            | -0.701             | 0.144                 | 0.00200   | 0.01200                   | -0.603    | 0.476               | 6.63      |             |
| 10/14/2013 16:16 0917-173, No13_10_14_1616_60_795 | 1      | -2.125   | 1.474      | 0.614          | 0.084              | 2.26               | 2.18                     | 0.44               | 1.84               | 1.84            | -0.678             | 0.140                 | 0.00100   | 0.0120                    | -0.420    | 0.434               | 5.714     |             |
| 10/14/2013 16:17 0917-173, No13_10_14_1617_61_458 | 1      | -0.788   | 1.017      | -0.234         | 0.076              | 2.48               | 0.0720                   | 0.399              | 1.209              | 1.209           | -2.69              | 0.132                 | 0.06600   | 0.00300                   | -1.255    | 0.339               | 9.046     |             |
| 10/14/2013 16:18 0917-173, No13_10_14_1618_62_278 | 1      | 0.0790   | 0.920      | -0.603         | 0.084              | 0.241              | 0.0390                   | 0.124              | 0.451              | 0.451           | -3.15              | 0.141                 | -0.00300  | 0.00200                   | -0.853    | 0.324               | 9.591     |             |
| 10/14/2013 16:19 0917-173, No13_10_14_1619_63_028 | 1      | 0.9870   | 0.829      | -0.206         | 0.051              | 0.215              | 0.0320                   | 0.110              | 0.270              | 0.270           | -1.451             | 0.102                 | 0.0       | 0.000                     | -0.970    | 0.280               | 5.115     |             |
| 10/14/2013 16:20 0917-173, No13_10_14_1620_63_780 | 1      | 0.5810   | 0.855      | 0.052          | 0.080              | 0.155              | 0.0290                   | 0.190              | 0.477              | 0.477           | -0.8800            | 0.089                 | 0.00000   | 0.00200                   | -0.640    | 0.265               | 4.937     |             |
| 10/14/2013 16:21 0917-173, No13_10_14_1621_64_478 | 1      | -0.5     |            |                |                    |                    |                          |                    |                    |                 |                    |                       |           |                           |           |                     |           |             |

124

| Location                                          | Disc.  | #        | Start/Stop | Instrument     | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Splice | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                   |           |              |
|---------------------------------------------------|--------|----------|------------|----------------|--------------------|--------------------|---------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|-------------------|-----------|--------------|
| Date                                              | Method | Filename | OF         | Acroline (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                 | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur Hexafluoride (ppm) | SEC (ppm) | acetaldhyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/14/2013 19:47 0917-173, No13_10_14_1947_21_905 | 1      | 8.14     | 3.51       | 0.022          | 0.0170             | -0.0130            | 0.022                     | 0.0170             | -0.0130            | 0.022           | 0.0170             | -0.0130               | 0.022     | 0.0170                    | -0.0130   | 0.022             | 0.0170    | -0.0130      |
| 10/14/2013 19:47 0917-173, No13_10_14_1947_34_085 | 1      | -11.44   | 3.318      | 0.431          | 0.176              | -0.104             | 0.132                     | 0.936              | 0.52               | 0.672           | 0.296              | -0.0130               | 0.0000    | -0.0130                   | 0.0000    | -2.76             | 0.99      | -0.575       |
| 10/14/2013 19:47 0917-173, No13_10_14_1948_40_265 | 1      | -8.246   | 3.061      | 0.029          | 0.171              | -0.210             | 0.138                     | 0.568              | 0.55               | 0.285           | 0.283              | -0.0130               | 0.0000    | -0.0130                   | 0.0000    | -1.7610           | 0.92      | -0.516       |
| 10/14/2013 19:47 0917-173, No13_10_14_1947_46_545 | 1      | -10.586  | 3.032      | 0.277          | 0.174              | -0.436             | 0.128                     | 0.928              | 0.60               | 0.048           | 0.288              | -0.0160               | 0.0000    | -0.0160                   | 0.0000    | -1.124            | 0.92      | -0.189       |
| 10/14/2013 19:47 0917-173, No13_10_14_1947_52_605 | 1      | -1.35    | 3.950      | -0.144         | 0.163              | -0.200             | 0.134                     | 0.911              | 0.68               | -0.125          | 0.270              | -0.0153               | 0.0000    | -0.0153                   | 0.0000    | -1.24             | 0.91      | -0.111       |
| 10/14/2013 19:47 0917-173, No13_10_14_1947_58_785 | 1      | -10.881  | 3.043      | -0.2030        | 0.183              | -0.2160            | 0.132                     | 0.888              | 0.79               | -0.0520         | 0.280              | -0.0200               | 0.0000    | -0.0200                   | 0.0000    | -1.05             | 0.94      | -0.256       |
| 10/14/2013 19:48 0917-173, No13_10_14_1948_05_005 | 1      | -0.962   | 3.060      | -0.271         | 0.166              | -0.068             | 0.123                     | 0.790              | 0.76               | 0.17            | 0.271              | -0.0200               | 0.0000    | -0.0200                   | 0.0000    | -1.257            | 0.91      | -0.209       |
| 10/14/2013 19:48 0917-173, No13_10_14_1948_12_245 | 1      | -74.70   | 2.834      | -0.032         | 0.166              | -0.2100            | 0.122                     | 0.847              | 0.59               | 0.264           | 0.267              | -0.0300               | 0.0000    | -0.0300                   | 0.0000    | -1.10             | 0.88      | -0.206       |
| 10/14/2013 19:48 0917-173, No13_10_14_1948_17_425 | 1      | -13.58   | 3.087      | -0.068         | 0.159              | -0.241             | 0.131                     | 0.543              | 0.86               | -0.041          | 0.270              | -0.0270               | 0.0000    | -0.0270                   | 0.0000    | -2.61             | 0.91      | -0.133       |
| 10/14/2013 19:48 0917-173, No13_10_14_1948_23_505 | 1      | -6.95    | 3.035      | 0.0350         | 0.158              | -0.265             | 0.123                     | 0.936              | 0.88               | -0.026          | 0.265              | -0.0060               | 0.0000    | -0.0060                   | 0.0000    | -1.342            | 0.86      | -0.153       |
| 10/14/2013 19:48 0917-173, No13_10_14_1948_29_645 | 1      | -3.703   | 2.970      | -0.122         | 0.159              | -0.1320            | 0.130                     | 0.521              | 0.92               | 0.115           | 0.264              | -0.0140               | 0.0000    | -0.0140                   | 0.0000    | -0.49             | 0.90      | -0.126       |
| 10/14/2013 19:48 0917-173, No13_10_14_1948_35_965 | 1      | -3.716   | 2.858      | 0.176          | 0.164              | -0.1740            | 0.130                     | 0.51               | 0.96               | 0.029           | 0.265              | -0.0270               | 0.0000    | -0.0270                   | 0.0000    | -0.59             | 0.87      | -0.054       |
| 10/14/2013 19:48 0917-173, No13_10_14_1948_42_075 | 1      | -6.552   | 3.149      | -0.042         | 0.165              | -0.0830            | 0.126                     | 0.766              | 0.96               | 0.12            | 0.276              | -0.0240               | 0.0000    | -0.0240                   | 0.0000    | -1.747            | 0.92      | -0.069       |
| 10/14/2013 19:48 0917-173, No13_10_14_1948_48_245 | 1      | -9.227   | 2.858      | 0.071          | 0.163              | -0.2110            | 0.128                     | 0.926              | 0.99               | 0.35            | 0.263              | -0.0140               | 0.0000    | -0.0140                   | 0.0000    | -3.92             | 0.88      | -0.063       |
| 10/14/2013 19:48 0917-173, No13_10_14_1948_54_325 | 1      | -8.880   | 2.860      | -0.1330        | 0.160              | -0.1600            | 0.132                     | 0.974              | 0.80               | -0.068          | 0.262              | -0.0270               | 0.0000    | -0.0270                   | 0.0000    | -1.259            | 0.88      | -0.051       |
| 10/14/2013 19:49 0917-173, No13_10_14_1949_06_595 | 1      | -13.537  | 2.982      | -0.130         | 0.166              | -0.0100            | 0.123                     | 0.988              | 0.96               | -0.18           | 0.276              | -0.0040               | 0.0000    | -0.0040                   | 0.0000    | -0.544            | 0.92      | -0.109       |
| 10/14/2013 19:49 0917-173, No13_10_14_1949_06_775 | 1      | -4.407   | 2.918      | -0.332         | 0.153              | -0.251             | 0.131                     | 0.937              | 0.99               | -0.358          | 0.258              | -0.0290               | 0.0000    | -0.0290                   | 0.0000    | -1.803            | 0.85      | -0.088       |
| 10/14/2013 19:49 0917-173, No13_10_14_1949_12_935 | 1      | 0.168    | 2.996      | -0.116         | 0.161              | -0.14700           | 0.131                     | 0.954              | 1.10               | -0.0630         | 0.265              | -0.0150               | 0.0000    | -0.0150                   | 0.0000    | -1.6090           | 0.90      | -0.042       |
| 10/14/2013 19:49 0917-173, No13_10_14_1949_19_205 | 1      | -9.029   | 2.778      | -0.059         | 0.166              | -0.205             | 0.125                     | 1.291              | 1.11               | 0.303           | 0.261              | -0.0230               | 0.0000    | -0.0230                   | 0.0000    | -1.627            | 0.82      | -0.004       |
| 10/14/2013 19:49 0917-173, No13_10_14_1949_25_285 | 1      | -9.095   | 2.961      | 0.036          | 0.163              | -0.131             | 0.126                     | 0.14               | 1.07               | -0.193          | 0.269              | -0.0250               | 0.0000    | -0.0250                   | 0.0000    | -0.77             | 0.90      | 0.084        |
| 10/14/2013 19:49 0917-173, No13_10_14_1949_31_435 | 1      | -2.17    | 2.760      | 0.148          | 0.151              | -0.0980            | 0.131                     | 1.152              | 1.16               | -0.312          | 0.250              | -0.0260               | 0.0000    | -0.0260                   | 0.0000    | -0.87             | 0.84      | 0.036        |
| 10/14/2013 19:49 0917-173, No13_10_14_1949_37_715 | 1      | 0.895    | 2.785      | 0.145          | 0.162              | -0.121             | 0.127                     | 1.030              | 1.23               | -0.395          | 0.261              | -0.0260               | 0.0000    | -0.0260                   | 0.0000    | -1.148            | 0.88      | 0.13         |
| 10/14/2013 19:49 0917-173, No13_10_14_1949_43_965 | 1      | -8.421   | 2.743      | -0.032         | 0.147              | -0.052             | 0.128                     | 0.614              | 1.28               | 0.320           | 0.242              | -0.0140               | 0.0000    | -0.0140                   | 0.0000    | -1.101            | 0.80      | 0.061        |
| 10/14/2013 19:49 0917-173, No13_10_14_1949_50_095 | 1      | -3.305   | 2.752      | 0.031          | 0.147              | -0.308             | 0.126                     | 0.576              | 1.31               | 0.48            | 0.243              | -0.0150               | 0.0000    | -0.0150                   | 0.0000    | -2.42             | 0.82      | 0.184        |
| 10/14/2013 19:49 0917-173, No13_10_14_1949_56_175 | 1      | -4.954   | 2.916      | -0.0040        | 0.150              | -0.0390            | 0.131                     | 1.008              | 1.48               | -0.581          | 0.250              | -0.0040               | 0.0000    | -0.0040                   | 0.0000    | -1.08             | 0.84      | 0.2          |
| 10/14/2013 19:50 0917-173, No13_10_14_1950_02_265 | 1      | 5.7450   | 2.825      | -0.637         | 0.155              | -0.115             | 0.146                     | 0.86               | 1.460              | 0.243           | 0.263              | -0.0220               | 0.0000    | -0.0220                   | 0.0000    | -0.850            | 0.83      | 0.022        |
| 10/14/2013 19:50 0917-173, No13_10_14_1950_08_595 | 1      | -3.461   | 2.643      | -0.065         | 0.148              | -0.0540            | 0.122                     | 1.104              | 1.469              | 0.022           | 0.240              | -0.0150               | 0.0000    | -0.0150                   | 0.0000    | -1.576            | 0.82      | 0.198        |
| 10/14/2013 19:50 0917-173, No13_10_14_1950_14_785 | 1      | -2.42    | 2.618      | -0.003         | 0.141              | -0.1250            | 0.125                     | 0.990              | 1.484              | -0.182          | 0.229              | -0.0090               | 0.0000    | -0.0090                   | 0.0000    | -1.405            | 0.78      | 0.212        |
| 10/14/2013 19:50 0917-173, No13_10_14_1950_20_855 | 1      | -1.733   | 2.505      | 0.170          | 0.149              | 0.0200             | 0.131                     | 0.795              | 1.517              | 0.375           | 0.235              | -0.0170               | 0.0000    | -0.0170                   | 0.0000    | -0.427            | 0.75      | 0.189        |
| 10/14/2013 19:50 0917-173, No13_10_14_1950_27_095 | 1      | -4.200   | 2.02       | -0.154         | 0.142              | -0.095             | 0.128                     | 0.615              | 1.451              | -0.184          | 0.235              | -0.0180               | 0.0000    | -0.0180                   | 0.0000    | -0.71             | 0.85      | 0.254        |
| 10/14/2013 19:50 0917-173, No13_10_14_1950_33_235 | 1      | 1.35     | 2.687      | -0.405         | 0.141              | -0.213             | 0.125                     | 0.443              | 1.444              | -0.2940         | 0.235              | -0.0180               | 0.0000    | -0.0180                   | 0.0000    | -0.914            | 0.80      | 0.166        |
| 10/14/2013 19:50 0917-173, No13_10_14_1950_39_435 | 1      | -7.872   | 2.584      | 0.126          | 0.159              | 0.116              | 0.123                     | 0.973              | 1.469              | 0.127           | 0.253              | -0.02                 | 0.0000    | -0.02                     | 0.0000    | -1.485            | 0.83      | 0.194        |
| 10/14/2013 19:50 0917-173, No13_10_14_1950_45_585 | 1      | -0.030   | 2.689      | -0.164         | 0.158              | -0.1270            | 0.128                     | 0.860              | 1.459              | -0.261          | 0.238              | -0.0140               | 0.0000    | -0.0140                   | 0.0000    | -0.582            | 0.84      | 0.293        |
| 10/14/2013 19:50 0917-173, No13_10_14_1950_51_825 | 1      | -2.81    | 2.947      | -0.084         | 0.152              | -0.1230            | 0.133                     | 0.862              | 1.439              | -0.0340         | 0.254              | -0.0070               | 0.0000    | -0.0070                   | 0.0000    | -0.935            | 0.85      | 0.236        |
| 10/14/2013 19:50 0917-173, No13_10_14_1950_58_005 | 1      | -0.951   | 2.473      | -0.0110        | 0.152              | -0.220             | 0.134                     | 0.803              | 1.450              | -0.05           | 0.237              | -0.02                 | 0.0000    | -0.02                     | 0.0000    | -1.101            | 0.80      | 0.186        |
| 10/14/2013 19:51 0917-173, No13_10_14_1951_04_185 | 1      | -4.316   | 2.759      | 0.1850         | 0.147              | -0.0930            | 0.125                     | 0.702              | 1.458              | -0.024          | 0.245              | -0.0230               | 0.0000    | -0.0230                   | 0.0000    | -2.22             | 0.84      | 0.193        |
| 10/14/2013 19:51 0917-173, No13_10_14_1951_10_375 | 1      | -6.30    | 2.769      | 0.0150         | 0.154              | -0.0150            | 0.127                     | 0.839              | 1.451              | 0.293           | 0.238              | -0.0150               | 0.0000    | -0.0150                   | 0.0000    | -0.87             | 0.87      | 0.232        |
| 10/14/2013 19:51 0917-173, No13_10_14_1951_16_615 | 1      | -3.050   | 2.641      | 0.150          | 0.145              | 0.0200             | 0.124                     | 1.135              | 1.465              | -0.372          | 0.238              | -0.0060               | 0.0000    | -0.0060                   | 0.0000    | -0.054            | 0.83      | 0.264        |
| 10/14/2013 19:51 0917-173, No13_10_14_1951_22_685 | 1      | -7.443   | 2.695      | -0.0550        | 0.155              | -0.202             | 0.128                     | 1.118              | 1.467              | 0.099           | 0.233              | -0.0250               | 0.0000    | -0.0250                   | 0.0000    | -0.89             | 0.86      | 0.24         |
| 10/14/2013 19:51 0917-173, No13_10_14_1951_28_895 | 1      | -6.098   | 2.707      | -0.128         | 0.140              | -0.1420            | 0.128                     | 0.234              | 1.477              | -0.045          | 0.245              | -0.0160               | 0.0000    | -0.0160                   | 0.0000    | -0.61             | 0.81      | 0.232        |
| 10/14/2013 19:51 0917-173, No13_10_14_1951_35_135 | 1      | -8.294   | 2.604      | -0.0040        | 0.138              | -0.096             | 0.133                     | 0.576              | 1.472              | -0.181          | 0.228              | -0.0120               | 0.0000    | -0.0120                   | 0.0000    | -0.23             | 0.76      | 0.162        |
| 10/14/2013 19:51 0917-173, No13_10_14_1951_41_325 | 1      | -7.731   | 2.727      | 0.120          | 0.144              | -0.1400            | 0.124                     | 0.887              | 1.525              | -0.06           | 0.241              | -0.0190               | 0.0000    | -0.0190                   | 0.0000    | -1.36             | 0.80      | 0.235        |
| 10/14/2013 19:51 0917-173, No13_10_14_1951_47_515 | 1      | -7.691   | 2.859      | 0.1360         | 0.145              | -0.059             | 0.130                     | 0.423              | 1.429              | 0.11            | 0.245              | -0.0010               | 0.0000    | -0.0010                   | 0.0000    | -1.710            | 0.83      | 0.265        |
| 10/14/2013 19:51 0917-173, No13_10_14_1951_53_595 | 1      | -4.040   | 2.942      | -0.104         | 0.149              | -0.064             | 0.120                     | 0.090              | 1.462              | 0.115           | 0.247              | -0.0170               | 0.0000    | -0.0170                   | 0.0000    | -0.61             | 0.76      | 0.177        |
| 10/14/2013 19:51 0917-173, No13_10_14_1951_59_795 | 1      | -2.483   | 2.698      | -0.106         | 0.149              | 0.005              | 0.128                     | 0.362              | 1.523              | -0.3550         | 0.242              | -0.0150               | 0.0000    | -0.0150                   | 0.0000    | -0.77             | 0.81      | 0.256        |
| 10/14/2013 19:52 0917-173, No13_10_14_1952_05_975 | 1      | -9.180   | 2.765      | 0.348          | 0.145              | 0.122              | 0.128                     | 0.647              | 1.533              | -0.199          | 0.242              | -0.0290               | 0.0000    | -0.0290                   | 0.0000    | 0.92              | 0.79      | 0.219        |
| 10/14/2013 19:52 0917-173, No13_10_14_1952_12_155 | 1      | -6.409   | 2.850      | -0.084         | 0.140              | -0.124             | 0.125                     | 0.889              | 1.455              | -0.243          | 0.240              | -0.0290               | 0.0000    | -0.0290                   | 0.0000    | -1.50             | 0.81      | 0.243        |
| 10/14/2013 19:52 0917-173, No13_10_14_1952_18_405 | 1      | -0.886   | 2.564      | -0.1360        | 0.146              | -0.171             | 0.122                     | 0.776              | 1.562              | 0.285           | 0.241              | -0.0090               | 0.0000    | -0.0090                   | 0.0000    | -1.94             | 0.83      | 0.264        |
| 10/14/2013 19:52 0917-173, No13_10_14_1952_24_465 | 1      | -2.492   | 2.512      | 0.188          | 0.148              | -0.102             | 0.134                     | 0.739              | 1.555              | 0.208           | 0.238              | -0.0160               | 0.0000    | -0.0160                   | 0.0000    | -1.71             | 0.78      | 0.273        |
| 10/14/2013 19:52 0917-173, No13_10_14_1952_30_645 | 1      | -7.2470  | 2.751      | 0.139          | 0.145              | -0.0320            | 0.125                     | 0.971              | 1.511              | -0.242          | 0.243              | -0.0150               | 0.0000    | -0.0150                   | 0.0000    | -0.64             | 0.82      | 0.278        |
| 10/14/2013 19:52 0917-173, No13_10_14_1952_36_905 | 1      | -1.70    | 2.868      | -0.126         | 0.148              | -0.126             | 0.143                     | 0.869              | 1.579              | -0.126          | 0.243              | -0.0170               | 0.0000    | -0.0170                   | 0.0000    | -0.72             | 0.72      | 0.25         |
| 10/14/2013 19:52 0917-173, No13_10_14_1952_43_035 | 1      | -1.388   | 2.526      | 0.139          | 0.146              | -0.01              |                           |                    |                    |                 |                    |                       |           |                           |           |                   |           |              |



| Location                                          | Disc.  | #        | Start/Stop | Instrument     | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                    |           |              |
|---------------------------------------------------|--------|----------|------------|----------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|--------------------|-----------|--------------|
| Date                                              | Method | Filename | DF         | Acroline (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur Hexafluoride (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/15/2013 10:16 0917-173, Ne13_10_15_1016_25_586 | 1      | 1.151    | 0.0000     | 0.0000         | 0.0000             | 0.0000             | 0.0000                   | 0.0000             | 0.0000             | 0.0000          | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 10:17 0917-173, Ne13_10_15_1017_23_324 | 1      | -0.6000  | 0.760      | -0.0140        | 0.046              | 0.132              | 0.0800                   | 0.0270             | 0.0620             | 0.113           | 0.074              | -0.0500               | 0.0000    | -0.0500                   | 0.0000    | -0.736             | 0.240     | 0.323        |
| 10/15/2013 10:18 0917-173, Ne13_10_15_1018_24_144 | 1      | 0.843    | 0.896      | 0.0390         | 0.054              | 1.91               | 0.0550                   | 0.252              | 0.963              | -0.390          | 0.087              | -0.390                | 0.087     | -0.390                    | 0.087     | -0.390             | 0.087     | 0.963        |
| 10/15/2013 10:19 0917-173, Ne13_10_15_1019_24_844 | 1      | 1.006    | 1.033      | 0.037          | 0.050              | 2.57               | 0.0770                   | 0.139              | 1.424              | 0.652           | 0.099              | -0.652                | 0.099     | -0.652                    | 0.099     | -0.652             | 0.099     | 1.424        |
| 10/15/2013 10:20 0917-173, Ne13_10_15_1020_24_504 | 1      | -1.4110  | 0.897      | 0.025          | 0.057              | 2.62               | 0.0770                   | 0.169              | 1.451              | -0.7880         | 0.096              | -0.7880               | 0.096     | -0.7880                   | 0.096     | -0.7880            | 0.096     | 1.451        |
| 10/15/2013 10:21 0917-173, Ne13_10_15_1021_25_404 | 1      | -1.2330  | 1.011      | 0.0600         | 0.057              | 2.66               | 0.0750                   | 0.396              | 1.449              | -0.642          | 0.099              | -0.642                | 0.099     | -0.642                    | 0.099     | -0.642             | 0.099     | 1.449        |
| 10/15/2013 10:22 0917-173, Ne13_10_15_1022_26_154 | 1      | -0.951   | 0.921      | -0.007         | 0.059              | 2.56               | 0.0740                   | 0.416              | 1.451              | -0.762          | 0.099              | -0.762                | 0.099     | -0.762                    | 0.099     | -0.762             | 0.099     | 1.451        |
| 10/15/2013 10:23 0917-173, Ne13_10_15_1023_26_864 | 1      | 1.244    | 0.909      | 0.044          | 0.055              | 2.03               | 0.0760                   | 0.362              | 1.452              | 0.557           | 0.095              | -0.557                | 0.095     | -0.557                    | 0.095     | -0.557             | 0.095     | 1.452        |
| 10/15/2013 10:24 0917-173, Ne13_10_15_1024_27_084 | 1      | -0.5600  | 0.984      | 0.165          | 0.055              | 2.61               | 0.0770                   | 0.309              | 1.448              | -0.625          | 0.096              | -0.625                | 0.096     | -0.625                    | 0.096     | -0.625             | 0.096     | 1.448        |
| 10/15/2013 10:25 0917-173, Ne13_10_15_1025_28_404 | 1      | 0.027    | 0.974      | 0.086          | 0.060              | 2.51               | 0.0760                   | 0.385              | 1.450              | -0.556          | 0.101              | -0.556                | 0.101     | -0.556                    | 0.101     | -0.556             | 0.101     | 1.450        |
| 10/15/2013 10:26 0917-173, Ne13_10_15_1026_29_214 | 1      | 0.527    | 1.030      | -0.040         | 0.054              | 2.35               | 0.0740                   | 0.328              | 1.444              | -0.460          | 0.093              | -0.460                | 0.093     | -0.460                    | 0.093     | -0.460             | 0.093     | 1.444        |
| 10/15/2013 10:27 0917-173, Ne13_10_15_1027_30_044 | 1      | 0.131    | 0.910      | 0.056          | 0.054              | 2.25               | 0.0700                   | 0.354              | 1.438              | -0.576          | 0.092              | -0.576                | 0.092     | -0.576                    | 0.092     | -0.576             | 0.092     | 1.438        |
| 10/15/2013 10:28 0917-173, Ne13_10_15_1028_30_805 | 1      | -0.0030  | 0.973      | 0.1150         | 0.058              | 2.33               | 0.0730                   | 0.353              | 1.433              | -0.566          | 0.095              | -0.566                | 0.095     | -0.566                    | 0.095     | -0.566             | 0.095     | 1.433        |
| 10/15/2013 10:29 0917-173, Ne13_10_15_1029_31_375 | 1      | -0.047   | 0.992      | 0.1200         | 0.057              | 2.39               | 0.0740                   | 0.370              | 1.442              | -0.605          | 0.097              | -0.605                | 0.097     | -0.605                    | 0.097     | -0.605             | 0.097     | 1.442        |
| 10/15/2013 10:30 0917-173, Ne13_10_15_1030_32_205 | 1      | 0.976    | 0.970      | 0.103          | 0.056              | 2.09               | 0.0720                   | 0.396              | 1.445              | -0.571          | 0.102              | -0.571                | 0.102     | -0.571                    | 0.102     | -0.571             | 0.102     | 1.445        |
| 10/15/2013 10:31 0917-173, Ne13_10_15_1031_33_365 | 1      | -1.281   | 0.934      | 0.106          | 0.056              | 2.45               | 0.0740                   | 0.242              | 1.446              | -0.597          | 0.096              | -0.597                | 0.096     | -0.597                    | 0.096     | -0.597             | 0.096     | 1.446        |
| 10/15/2013 10:32 0917-173, Ne13_10_15_1032_33_755 | 1      | 0.584    | 0.917      | 0.0720         | 0.053              | 2.63               | 0.0740                   | 0.297              | 1.447              | -0.594          | 0.093              | -0.594                | 0.093     | -0.594                    | 0.093     | -0.594             | 0.093     | 1.447        |
| 10/15/2013 10:33 0917-173, Ne13_10_15_1033_34_495 | 1      | 0.140    | 0.925      | 0.036          | 0.062              | 2.76               | 0.0760                   | 0.394              | 1.459              | -0.565          | 0.103              | -0.565                | 0.103     | -0.565                    | 0.103     | -0.565             | 0.103     | 1.459        |
| 10/15/2013 10:34 0917-173, Ne13_10_15_1034_35_205 | 1      | -1.176   | 0.964      | 0.0620         | 0.059              | 2.85               | 0.0780                   | 0.236              | 1.465              | -0.643          | 0.101              | -0.643                | 0.101     | -0.643                    | 0.101     | -0.643             | 0.101     | 1.465        |
| 10/15/2013 10:35 0917-173, Ne13_10_15_1035_35_975 | 1      | 0.261    | 0.917      | -0.040         | 0.061              | 2.85               | 0.0770                   | 0.350              | 1.474              | -0.691          | 0.101              | -0.691                | 0.101     | -0.691                    | 0.101     | -0.691             | 0.101     | 1.474        |
| 10/15/2013 10:36 0917-173, Ne13_10_15_1036_36_815 | 1      | 0.039    | 0.942      | 0.0500         | 0.055              | 2.87               | 0.0780                   | 0.298              | 1.470              | -0.7240         | 0.096              | -0.7240               | 0.096     | -0.7240                   | 0.096     | -0.7240            | 0.096     | 1.470        |
| 10/15/2013 10:37 0917-173, Ne13_10_15_1037_37_575 | 1      | 1.0900   | 1.032      | 0.015          | 0.056              | 2.64               | 0.0760                   | 0.309              | 1.464              | -0.450          | 0.097              | -0.450                | 0.097     | -0.450                    | 0.097     | -0.450             | 0.097     | 1.464        |
| 10/15/2013 10:38 0917-173, Ne13_10_15_1038_38_255 | 1      | 0.378    | 0.963      | 0.0320         | 0.058              | 2.69               | 0.0750                   | 0.463              | 1.463              | -0.677          | 0.097              | -0.677                | 0.097     | -0.677                    | 0.097     | -0.677             | 0.097     | 1.463        |
| 10/15/2013 10:39 0917-173, Ne13_10_15_1039_39_115 | 1      | -0.740   | 0.979      | 0.035          | 0.056              | 2.80               | 0.0780                   | 0.442              | 1.467              | -0.729          | 0.100              | -0.729                | 0.100     | -0.729                    | 0.100     | -0.729             | 0.100     | 1.467        |
| 10/15/2013 10:40 0917-173, Ne13_10_15_1040_39_786 | 1      | 0.392    | 1.016      | 0.079          | 0.057              | 2.75               | 0.0740                   | 0.355              | 1.469              | -0.672          | 0.100              | -0.672                | 0.100     | -0.672                    | 0.100     | -0.672             | 0.100     | 1.469        |
| 10/15/2013 10:41 0917-173, Ne13_10_15_1041_40_576 | 1      | 0.130    | 0.966      | 0.0760         | 0.058              | 2.02               | 0.0760                   | 0.425              | 1.477              | -0.592          | 0.102              | -0.592                | 0.102     | -0.592                    | 0.102     | -0.592             | 0.102     | 1.477        |
| 10/15/2013 10:42 0917-173, Ne13_10_15_1042_41_326 | 1      | 0.6400   | 1.010      | 0.029          | 0.057              | 2.39               | 0.0710                   | 0.347              | 1.461              | -0.560          | 0.098              | -0.560                | 0.098     | -0.560                    | 0.098     | -0.560             | 0.098     | 1.461        |
| 10/15/2013 10:43 0917-173, Ne13_10_15_1043_42_126 | 1      | 0.3730   | 0.912      | -0.067         | 0.059              | 2.33               | 0.0710                   | 0.480              | 1.453              | -0.6460         | 0.097              | -0.6460               | 0.097     | -0.6460                   | 0.097     | -0.6460            | 0.097     | 1.453        |
| 10/15/2013 10:44 0917-173, Ne13_10_15_1044_42_864 | 1      | -1.055   | 0.918      | 0.0520         | 0.056              | 2.19               | 0.0690                   | 0.428              | 1.447              | -0.541          | 0.093              | -0.541                | 0.093     | -0.541                    | 0.093     | -0.541             | 0.093     | 1.447        |
| 10/15/2013 10:45 0917-173, Ne13_10_15_1045_43_486 | 1      | -0.230   | 0.922      | 0.015          | 0.056              | 2.26               | 0.0740                   | 0.452              | 1.462              | -0.622          | 0.092              | -0.622                | 0.092     | -0.622                    | 0.092     | -0.622             | 0.092     | 1.462        |
| 10/15/2013 10:46 0917-173, Ne13_10_15_1046_44_456 | 1      | -0.115   | 0.897      | 0.053          | 0.058              | 2.22               | 0.0710                   | 0.488              | 1.426              | -0.480          | 0.097              | -0.480                | 0.097     | -0.480                    | 0.097     | -0.480             | 0.097     | 1.426        |
| 10/15/2013 10:47 0917-173, Ne13_10_15_1047_45_156 | 1      | 0.406    | 0.958      | -0.01          | 0.055              | 2.12               | 0.0680                   | 0.518              | 1.429              | -0.540          | 0.094              | -0.540                | 0.094     | -0.540                    | 0.094     | -0.540             | 0.094     | 1.429        |
| 10/15/2013 10:48 0917-173, Ne13_10_15_1048_45_966 | 1      | -0.613   | 0.942      | 0.013          | 0.055              | 2.04               | 0.0670                   | 0.514              | 1.427              | -0.596          | 0.096              | -0.596                | 0.096     | -0.596                    | 0.096     | -0.596             | 0.096     | 1.427        |
| 10/15/2013 10:49 0917-173, Ne13_10_15_1049_46_776 | 1      | -0.107   | 0.902      | 0.043          | 0.053              | 1.94               | 0.0680                   | 0.600              | 1.426              | -0.564          | 0.092              | -0.564                | 0.092     | -0.564                    | 0.092     | -0.564             | 0.092     | 1.426        |
| 10/15/2013 10:50 0917-173, Ne13_10_15_1050_47_546 | 1      | -1.2150  | 0.872      | -0.0900        | 0.053              | 1.97               | 0.0710                   | 0.304              | 1.414              | -0.639          | 0.092              | -0.639                | 0.092     | -0.639                    | 0.092     | -0.639             | 0.092     | 1.414        |
| 10/15/2013 10:51 0917-173, Ne13_10_15_1051_48_286 | 1      | -0.517   | 0.920      | 0.074          | 0.058              | 1.99               | 0.0670                   | 0.441              | 1.430              | -0.676          | 0.098              | -0.676                | 0.098     | -0.676                    | 0.098     | -0.676             | 0.098     | 1.430        |
| 10/15/2013 10:52 0917-173, Ne13_10_15_1052_49_107 | 1      | 0.302    | 0.920      | 0.120          | 0.055              | 1.70               | 0.0660                   | 0.481              | 1.417              | -0.587          | 0.097              | -0.587                | 0.097     | -0.587                    | 0.097     | -0.587             | 0.097     | 1.417        |
| 10/15/2013 10:53 0917-173, Ne13_10_15_1053_49_787 | 1      | 0.993    | 0.917      | -0.024         | 0.055              | 1.76               | 0.0680                   | 0.412              | 1.411              | -0.662          | 0.094              | -0.662                | 0.094     | -0.662                    | 0.094     | -0.662             | 0.094     | 1.411        |
| 10/15/2013 10:54 0917-173, Ne13_10_15_1054_50_637 | 1      | -1.842   | 0.947      | -0.021         | 0.056              | 2.00               | 0.0700                   | 0.491              | 1.430              | -0.751          | 0.098              | -0.751                | 0.098     | -0.751                    | 0.098     | -0.751             | 0.098     | 1.430        |
| 10/15/2013 10:55 0917-173, Ne13_10_15_1055_51_347 | 1      | -0.057   | 0.940      | -0.020         | 0.057              | 2.07               | 0.0720                   | 0.450              | 1.437              | -0.625          | 0.097              | -0.625                | 0.097     | -0.625                    | 0.097     | -0.625             | 0.097     | 1.437        |
| 10/15/2013 10:56 0917-173, Ne13_10_15_1056_51_117 | 1      | 1.342    | 0.957      | 0.057          | 0.060              | 1.95               | 0.0690                   | 0.439              | 1.445              | -0.822          | 0.102              | -0.822                | 0.102     | -0.822                    | 0.102     | -0.822             | 0.102     | 1.445        |
| 10/15/2013 10:57 0917-173, Ne13_10_15_1057_52_947 | 1      | 0.7480   | 1.004      | 0.0400         | 0.059              | 1.92               | 0.0720                   | 0.470              | 1.438              | -0.925          | 0.106              | -0.925                | 0.106     | -0.925                    | 0.106     | -0.925             | 0.106     | 1.438        |
| 10/15/2013 10:58 0917-173, Ne13_10_15_1058_53_697 | 1      | -1.559   | 0.995      | 0.0730         | 0.058              | 2.12               | 0.0700                   | 0.429              | 1.446              | -0.892          | 0.104              | -0.892                | 0.104     | -0.892                    | 0.104     | -0.892             | 0.104     | 1.446        |
| 10/15/2013 10:59 0917-173, Ne13_10_15_1059_54_417 | 1      | 0.3120   | 0.928      | 0.120          | 0.056              | 2.05               | 0.0690                   | 0.502              | 1.452              | -0.779          | 0.107              | -0.779                | 0.107     | -0.779                    | 0.107     | -0.779             | 0.107     | 1.452        |
| 10/15/2013 11:00 0917-173, Ne13_10_15_1100_55_187 | 1      | 0.642    | 0.950      | -0.129         | 0.053              | 2.24               | 0.0730                   | 0.445              | 1.463              | -0.9700         | 0.096              | -0.9700               | 0.096     | -0.9700                   | 0.096     | -0.9700            | 0.096     | 1.463        |
| 10/15/2013 11:01 0917-173, Ne13_10_15_1101_55_987 | 1      | 0.711    | 0.919      | -0.0180        | 0.0540             | 2.28               | 0.0720                   | 0.499              | 1.461              | -0.803          | 0.097              | -0.803                | 0.097     | -0.803                    | 0.097     | -0.803             | 0.097     | 1.461        |
| 10/15/2013 11:02 0917-173, Ne13_10_15_1102_56_997 | 1      | -0.9300  | 0.952      | 0.0100         | 0.0540             | 2.19               | 0.0700                   | 0.522              | 1.460              | -0.952          | 0.100              | -0.952                | 0.100     | -0.952                    | 0.100     | -0.952             | 0.100     | 1.460        |
| 10/15/2013 11:03 0917-173, Ne13_10_15_1103_57_478 | 1      | -0.514   | 0.948      | 0.045          | 0.059              | 2.40               | 0.0700                   | 0.502              | 1.460              | -0.827          | 0.102              | -0.827                | 0.102     | -0.827                    | 0.102     | -0.827             | 0.102     | 1.460        |
| 10/15/2013 11:04 0917-173, Ne13_10_15_1104_58_198 | 1      | 2.315    | 0.955      | -0.042         | 0.059              | 2.53               | 0.0740                   | 0.334              | 1.473              | -0.7990         | 0.104              | -0.7990               | 0.104     | -0.7990                   | 0.104     | -0.7990            | 0.104     | 1.473        |
| 10/15/2013 11:05 0917-173, Ne13_10_15_1105_59_018 | 1      | 0.456    | 1.022      | 0.0120         | 0.057              | 2.26               | 0.0720                   | 0.339              | 1.467              | -0.858          | 0.104              | -0.858                | 0.104     | -0.858                    | 0.104     | -0.858             | 0.104     | 1.467        |
| 10/15/2013 11:06 0917-173, Ne13_10_15_1106_59_238 | 1      | -0.5070  | 0.912      | 0.0500         | 0.055              | 2.05               | 0.0690                   | 0.425              | 1.451              | -0.953          | 0.106              | -0.953                | 0.106     | -0.953                    | 0.106     | -0.953             | 0.106     | 1.451        |
| 10/15/2013 11:07 0917-173, Ne13_10_15_1107_60_548 | 1      | 1.791    | 0.982      | -0.070         | 0.054              | 1.98               | 0.0680                   | 0.484              | 1.441              | -0.555          |                    |                       |           |                           |           |                    |           |              |

| Location                                          | Disc.  | #        | Start/Stop | Instrument | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Splice | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                    |           |              |
|---------------------------------------------------|--------|----------|------------|------------|--------------------|--------------------|---------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|--------------------|-----------|--------------|
| Date                                              | Method | Filename | DF         | Acroline   | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                 | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur Hexafluoride (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/15/2013 12:04 0917-173, No13_10_15_1254_11_012 | 1      | 1.02     | 0.81       | 0.0000     | 0.0000             | 0.0000             | 0.0000                    | 0.0000             | 0.0000             | 0.0000          | 0.0000             | 0.0000                | 0.0000    | 0.0000                    | 0.0000    | 0.0000             | 0.0000    | 0.0000       |
| 10/15/2013 12:55 0917-173, No13_10_15_1255_11_762 | 1      | 0.852    | 0.912      | 0.076      | 0.053              | 0.0770             | 0.0510                    | 0.4140             | 1.108              | -0.103          | 0.086              | -0.00700              | 0.0000    | -0.6040                   | 0.281     | 1.676              | 0.382     | 4.389        |
| 10/15/2013 13:01 0917-173, No13_10_15_1311_08_205 | 1      | 0.8      | 1.2        | -0.318     | 0.073              | -0.35              | 1.33                      | -0.0790            | 0.0900             | -0.098          | 0.116              | -0.098                | 0.116     | -0.098                    | 0.116     | -0.098             | 0.116     | -0.098       |
| 10/15/2013 13:11 0917-173, No13_10_15_1311_26_705 | 1      | -1.1     | 1.3        | 0.01500    | 0.072              | -0.31              | 1.36                      | 0.098              | 0.0920             | 0.093           | 0.117              | 0.099                 | 0.117     | 0.099                     | 0.117     | -0.328             | 0.379     | -1.702       |
| 10/15/2013 13:11 0917-173, No13_10_15_1311_45_395 | 1      | 1.0      | 1.4        | -0.117     | 0.074              | -0.107             | 1.074                     | -0.064             | 0.053              | -0.008          | 0.123              | -0.064                | 0.123     | -0.008                    | 0.123     | -0.064             | 0.123     | -0.008       |
| 10/15/2013 13:12 0917-173, No13_10_15_1312_08_885 | 1      | 0.1      | 1.3        | -0.256     | 0.070              | -0.39              | 1.39                      | -0.0780            | 0.0870             | -0.046          | 0.115              | -0.046                | 0.115     | -0.046                    | 0.115     | -0.046             | 0.115     | -0.046       |
| 10/15/2013 13:12 0917-173, No13_10_15_1312_22_355 | 1      | -1.1     | 1.3        | -0.173     | 0.072              | -0.37              | 1.40                      | -0.2170            | 0.0910             | -0.156          | 0.117              | -0.156                | 0.117     | -0.156                    | 0.117     | -0.156             | 0.117     | -0.156       |
| 10/15/2013 13:12 0917-173, No13_10_15_1312_42_005 | 1      | -0.0730  | 0.073      | -0.337     | 1.38               | -0.1020            | 0.0940                    | -0.1360            | 0.114              | -0.1360         | 0.114              | -0.1360               | 0.114     | -0.1360                   | 0.114     | -0.1360            | 0.114     | -0.1360      |
| 10/15/2013 13:12 0917-173, No13_10_15_1312_59_495 | 1      | 1.4      | 1.3        | -0.0300    | 0.070              | -0.38              | 1.40                      | -0.0880            | 0.0850             | -0.032          | 0.115              | -0.032                | 0.115     | -0.032                    | 0.115     | -0.032             | 0.115     | -0.032       |
| 10/15/2013 13:13 0917-173, No13_10_15_1313_17_965 | 1      | 1.8      | 1.3        | 0.032      | 0.069              | -0.41              | 1.40                      | -0.0750            | 0.0930             | -0.043          | 0.114              | -0.043                | 0.114     | -0.043                    | 0.114     | -0.043             | 0.114     | -0.043       |
| 10/15/2013 13:13 0917-173, No13_10_15_1313_36_575 | 1      | -2.5     | 1.2        | -0.140     | 0.075              | -0.40              | 1.40                      | -0.1180            | 0.0880             | -0.005          | 0.116              | -0.005                | 0.116     | -0.005                    | 0.116     | -0.005             | 0.116     | -0.005       |
| 10/15/2013 13:13 0917-173, No13_10_15_1313_55_075 | 1      | 1.3      | 1.3        | 0.1180     | 0.073              | 0.407              | 1.40                      | 0.125              | 0.0870             | 0.150           | 0.117              | 0.150                 | 0.117     | 0.150                     | 0.117     | 0.150              | 0.117     | 0.150        |
| 10/15/2013 13:14 0917-173, No13_10_15_1314_13_675 | 1      | 2.9      | 1.3        | 0.027      | 0.068              | -0.40              | 1.40                      | -0.0250            | 0.0100             | -0.16800        | 0.116              | -0.028                | 0.116     | -0.028                    | 0.116     | -0.028             | 0.116     | -0.028       |
| 10/15/2013 13:14 0917-173, No13_10_15_1314_32_115 | 1      | 0.9      | 1.2        | 0.196      | 0.072              | -0.53              | 1.40                      | -0.1840            | 0.0930             | -0.028          | 0.114              | -0.028                | 0.114     | -0.028                    | 0.114     | -0.028             | 0.114     | -0.028       |
| 10/15/2013 13:14 0917-173, No13_10_15_1314_56_625 | 1      | -0.0730  | 0.072      | -0.521     | 1.40               | -0.0500            | 0.0970                    | -0.115             | 0.057              | -0.053          | 0.157              | -0.053                | 0.157     | -0.053                    | 0.157     | -0.053             | 0.157     | -0.053       |
| 10/15/2013 13:33 0917-173, No13_10_15_1331_17_119 | 1      | -0.061   | 0.956      | -0.023     | 0.073              | 0.910              | 0.0730                    | 0.3540             | 1.524              | -2.214          | 0.196              | -0.00600              | 0.00000   | -0.34                     | 0.312     | 27.637             | 0.312     | 27.637       |
| 10/15/2013 13:34 0917-173, No13_10_15_1334_17_799 | 1      | 1.182    | 1.011      | -0.051     | 0.070              | 0.922              | 0.0750                    | 0.4190             | 1.522              | -2.094          | 0.188              | -0.00500              | 0.00000   | -0.41                     | 0.301     | 27.679             | 0.301     | 27.679       |
| 10/15/2013 13:35 0917-173, No13_10_15_1335_18_609 | 1      | 0.218    | 1.033      | -0.023     | 0.066              | 0.895              | 0.0740                    | 0.4270             | 1.510              | -2.076          | 0.193              | -0.00200              | 0.00000   | -0.71                     | 0.294     | 27.703             | 0.294     | 27.703       |
| 10/15/2013 13:36 0917-173, No13_10_15_1336_30_309 | 1      | 1.599    | 1.014      | 0.013      | 0.069              | 0.897              | 0.0760                    | 0.374              | 1.501              | -2.242          | 0.203              | -0.00700              | 0.00000   | -0.54                     | 0.309     | 29.957             | 0.309     | 29.957       |
| 10/15/2013 13:37 0917-173, No13_10_15_1337_20_129 | 1      | -0.296   | 1.023      | -0.076     | 0.071              | 0.851              | 0.0740                    | 0.355              | 1.505              | -2.311          | 0.203              | -0.00100              | 0.00000   | -0.30                     | 0.305     | 29.076             | 0.305     | 29.076       |
| 10/15/2013 13:38 0917-173, No13_10_15_1338_20_929 | 1      | -0.062   | 0.950      | -0.287     | 0.081              | 0.303              | 0.0410                    | 0.2870             | 0.673              | -1.314          | 0.163              | 0.00000               | 0.00000   | -1.22                     | 0.340     | 16.223             | 0.340     | 16.223       |
| 10/15/2013 13:39 0917-173, No13_10_15_1339_21_689 | 1      | -0.225   | 0.858      | -0.482     | 0.094              | -0.0430            | 0.0400                    | -0.055             | 0.1290             | -3.75           | 0.163              | -0.01000              | 0.00000   | -1.54                     | 0.365     | 10.979             | 0.365     | 10.979       |
| 10/15/2013 13:40 0917-173, No13_10_15_1340_22_460 | 1      | 0.062    | 0.847      | -0.571     | 0.090              | -0.0720            | 0.0390                    | -0.0250            | 0.0900             | -3.71           | 0.160              | -0.00700              | 0.00000   | -1.67                     | 0.373     | 10.901             | 0.373     | 10.901       |
| 10/15/2013 13:41 0917-173, No13_10_15_1341_23_230 | 1      | -0.208   | 0.881      | -0.574     | 0.089              | -0.0660            | 0.0390                    | -0.0490            | 0.0840             | -3.73           | 0.167              | -0.00400              | 0.00000   | -1.35                     | 0.389     | 10.318             | 0.389     | 10.318       |
| 10/15/2013 13:42 0917-173, No13_10_15_1342_23_980 | 1      | -0.465   | 0.847      | -0.5230    | 0.095              | -0.0650            | 0.0390                    | -0.096             | 0.0820             | -3.78           | 0.164              | -0.00400              | 0.00000   | -0.63                     | 0.376     | 10.256             | 0.376     | 10.256       |
| 10/15/2013 13:43 0917-173, No13_10_15_1343_24_780 | 1      | 0.092    | 0.850      | -0.443     | 0.092              | -0.0390            | 0.0400                    | -0.0470            | 0.060              | -0.137          | 0.167              | -0.00200              | 0.00000   | -0.364                    | 0.364     | 10.837             | 0.364     | 10.837       |
| 10/15/2013 13:44 0917-173, No13_10_15_1344_25_530 | 1      | 1.980    | 0.936      | -0.110     | 0.068              | 0.692              | 0.0620                    | 0.387              | 1.328              | -2.444          | 0.179              | -0.00700              | 0.00000   | -0.98                     | 0.286     | 24.767             | 0.286     | 24.767       |
| 10/15/2013 13:45 0917-173, No13_10_15_1345_26_340 | 1      | 0.803    | 1.023      | -0.022     | 0.072              | 0.850              | 0.0730                    | 0.5140             | 1.512              | -2.36           | 0.208              | -0.00600              | 0.00000   | -0.33                     | 0.332     | 29.752             | 0.332     | 29.752       |
| 10/15/2013 13:46 0917-173, No13_10_15_1346_27_110 | 1      | -0.516   | 0.994      | -0.030     | 0.070              | 0.810              | 0.0730                    | 0.4650             | 1.484              | -2.32           | 0.212              | -0.00200              | 0.00000   | -0.60                     | 0.299     | 31.029             | 0.299     | 31.029       |
| 10/15/2013 13:47 0917-173, No13_10_15_1347_27_820 | 1      | 1.25     | 0.997      | -0.015     | 0.069              | 0.871              | 0.0730                    | 0.501              | 1.487              | -2.31           | 0.210              | -0.00300              | 0.00000   | -0.54                     | 0.309     | 31.409             | 0.309     | 31.409       |
| 10/15/2013 13:48 0917-173, No13_10_15_1348_28_550 | 1      | 2.329    | 0.991      | -0.054     | 0.075              | 0.870              | 0.0740                    | 0.3880             | 1.495              | -2.41           | 0.228              | -0.00500              | 0.00000   | -0.86                     | 0.308     | 33.246             | 0.308     | 33.246       |
| 10/15/2013 13:49 0917-173, No13_10_15_1349_29_260 | 1      | 2.011    | 1.094      | -0.056     | 0.077              | 0.897              | 0.0760                    | 0.49400            | 1.497              | -2.739          | 0.235              | -0.00100              | 0.00000   | -0.20                     | 0.339     | 34.441             | 0.339     | 34.441       |
| 10/15/2013 13:50 0917-173, No13_10_15_1350_30_075 | 1      | 1.384    | 1.012      | -0.012     | 0.070              | 0.911              | 0.0750                    | 0.490              | 1.511              | -2.211          | 0.221              | -0.00300              | 0.00000   | -0.31                     | 0.327     | 34.913             | 0.327     | 34.913       |
| 10/15/2013 13:51 0917-173, No13_10_15_1351_30_870 | 1      | 0.777    | 1.012      | 0.014      | 0.075              | 0.955              | 0.0750                    | 0.3450             | 1.502              | -2.35           | 0.222              | -0.00000              | 0.00000   | -1.14                     | 0.322     | 32.665             | 0.322     | 32.665       |
| 10/15/2013 13:52 0917-173, No13_10_15_1352_31_591 | 1      | 1.07     | 1.058      | 0.008      | 0.076              | 0.940              | 0.0750                    | 0.4080             | 1.502              | -2.640          | 0.231              | -0.00300              | 0.00000   | -0.47                     | 0.323     | 33.245             | 0.323     | 33.245       |
| 10/15/2013 13:53 0917-173, No13_10_15_1353_32_351 | 1      | 1.546    | 1.028      | 0.020      | 0.075              | 0.953              | 0.0750                    | 0.4680             | 1.507              | -2.755          | 0.233              | -0.00700              | 0.00000   | -0.43                     | 0.318     | 34.188             | 0.318     | 34.188       |
| 10/15/2013 13:54 0917-173, No13_10_15_1354_33_161 | 1      | 0.062    | 0.976      | 0.062      | 0.076              | 0.978              | 0.0760                    | 0.3420             | 1.509              | -2.24           | 0.234              | -0.00300              | 0.00000   | -0.81                     | 0.310     | 33.676             | 0.310     | 33.676       |
| 10/15/2013 13:55 0917-173, No13_10_15_1355_33_891 | 1      | -1.199   | 1.006      | -0.005     | 0.073              | 0.944              | 0.0770                    | 0.33700            | 1.503              | -2.535          | 0.216              | -0.00900              | 0.00000   | -0.19                     | 0.318     | 31.79              | 0.318     | 31.79        |
| 10/15/2013 13:56 0917-173, No13_10_15_1356_34_631 | 1      | -0.591   | 0.993      | -0.061     | 0.071              | 0.971              | 0.0720                    | 0.228              | 1.499              | -2.43           | 0.216              | -0.00800              | 0.00000   | -1.07                     | 0.305     | 31.77              | 0.305     | 31.77        |
| 10/15/2013 13:57 0917-173, No13_10_15_1357_35_441 | 1      | 1.801    | 1.047      | -0.013     | 0.073              | 0.915              | 0.0730                    | 0.4000             | 1.491              | -2.066          | 0.236              | -0.00200              | 0.00000   | -0.369                    | 0.295     | 35.915             | 0.295     | 35.915       |
| 10/15/2013 13:58 0917-173, No13_10_15_1358_36_181 | 1      | -0.945   | 1.005      | -0.050     | 0.069              | 0.860              | 0.0730                    | 0.4720             | 1.488              | -2.381          | 0.198              | -0.00600              | 0.00000   | -0.22                     | 0.312     | 32.91              | 0.312     | 32.91        |
| 10/15/2013 13:59 0917-173, No13_10_15_1359_36_911 | 1      | 0.761    | 1.059      | 0.050      | 0.070              | 0.819              | 0.0720                    | 0.591              | 1.501              | -2.329          | 0.208              | -0.00400              | 0.00000   | -0.46                     | 0.320     | 28.816             | 0.320     | 28.816       |
| 10/15/2013 14:00 0917-173, No13_10_15_1400_37_771 | 1      | 0.119    | 0.928      | -0.0600    | 0.067              | 0.932              | 0.0730                    | 0.507              | 1.488              | -2.155          | 0.196              | -0.00300              | 0.00000   | -0.99                     | 0.291     | 28.824             | 0.291     | 28.824       |
| 10/15/2013 14:01 0917-173, No13_10_15_1401_38_521 | 1      | 0.230    | 0.911      | -0.019     | 0.067              | 0.915              | 0.0730                    | 0.4950             | 1.499              | -2.257          | 0.209              | -0.00300              | 0.00000   | -0.73                     | 0.315     | 30.162             | 0.315     | 30.162       |
| 10/15/2013 14:02 0917-173, No13_10_15_1402_39_241 | 1      | -1.804   | 0.986      | -0.033     | 0.072              | 0.965              | 0.0720                    | 0.43000            | 1.510              | -2.28           | 0.208              | -0.00200              | 0.00000   | -0.79                     | 0.315     | 30.162             | 0.315     | 30.162       |
| 10/15/2013 14:03 0917-173, No13_10_15_1403_40_061 | 1      | 0.188    | 1.052      | -0.017     | 0.066              | 0.940              | 0.0750                    | 0.4840             | 1.496              | -2.226          | 0.205              | -0.00400              | 0.00000   | -0.62                     | 0.317     | 29.988             | 0.317     | 29.988       |
| 10/15/2013 14:04 0917-173, No13_10_15_1403_40_782 | 1      | 2.722    | 1.017      | 0.113      | 0.072              | 1.017              | 0.0730                    | 0.3760             | 1.488              | -0.112          | 0.233              | -0.00300              | 0.00000   | -0.321                    | 0.303     | 30.993             | 0.303     | 30.993       |
| 10/15/2013 14:05 0917-173, No13_10_15_1405_41_502 | 1      | 0.773    | 1.048      | -0.067     | 0.071              | 0.942              | 0.0740                    | 0.4820             | 1.489              | -2.279          | 0.202              | -0.00800              | 0.00000   | -0.27                     | 0.324     | 29.723             | 0.324     | 29.723       |
| 10/15/2013 14:06 0917-173, No13_10_15_1406_42_382 | 1      | 0.641    | 1.000      | 0.089      | 0.068              | 0.813              | 0.0730                    | 0.4630             | 1.480              | -2.27           | 0.202              | -0.00400              | 0.00000   | -0.48                     | 0.309     | 29.094             | 0.309     | 29.094       |
| 10/15/2013 14:07 0917-173, No13_10_15_1407_43_092 | 1      | 0.393    | 1.042      | 0.007      | 0.074              | 0.867              | 0.0720                    | 0.3410             | 1.482              | -2.311          | 0.209              | -0.00400              | 0.00000   | -0.12                     | 0.331     | 29.911             | 0.331     | 29.911       |
| 10/15/2013 14:08 0917-173, No13_10_15_1408_43_852 | 1      | 1.095    | 1.045      | -0.013     | 0.065              | 0.913              | 0.0730                    | 0.4820             | 1.483              | -2.17           | 0.217              | -0.00300              | 0.00000   | -0.41                     | 0.303     | 31.681             | 0.303     | 31.681       |

| Location                                           | Disc.  | #        | Start/Stop | Instrument     | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                     |              |              |
|----------------------------------------------------|--------|----------|------------|----------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|---------------------|--------------|--------------|
| Date                                               | Method | Filename | OF         | Acroline (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur Hexafluoride (ppm) | SEC (ppm) | acetalddehyde (ppm) | SEC (ppm)    | pinene (ppm) |
| 10/15/2013 15:48 0917-173, No13_10_15_1548_58_428  | 1      | 1.813    | 1.025      | -0.003         | 0.093              | 0.074              | 0.074                    | 0.074              | 0.074              | 0.074           | 0.074              | 0.074                 | 0.074     | -0.0000                   | 0.0000    | -0.0000             | 0.0000       | 0.301 20.223 |
| 10/15/2013 15:49 0917-173, No13_10_15_1549_59_170  | 1      | 0.843    | 1.012      | -0.003         | 0.074              | 0.847              | 0.0660                   | 0.468              | 1.414              |                 |                    | -2.01                 | 0.210     | -0.0000                   | 0.0000    | -0.51               | 0.313 30.887 |              |
| 10/15/2013 15:50 0917-173, No13_10_15_1550_59_920  | 1      | 2.675    | 1.023      | -0.027         | 0.068              | 0.868              | 0.0660                   | 0.567              | 1.406              |                 |                    | -2.172                | 0.208     | -0.0000                   | 0.0000    | -0.18               | 0.308 30.617 |              |
| 10/15/2013 15:52 0917-173, No13_10_15_1552_59_631  | 1      | 1.901    | 0.972      | -0.016         | 0.072              | 0.816              | 0.0660                   | 0.420              | 1.392              |                 |                    | -2.06                 | 0.206     | -0.0000                   | 0.0000    | -0.61               | 0.311 29.584 |              |
| 10/15/2013 15:53 0917-173, No13_10_15_1553_59_401  | 1      | 2.79     | 0.990      | -0.010         | 0.053              | 0.0890             | 0.0530                   | 0.390              | 1.138              |                 |                    | -0.303                | 0.091     | -0.0000                   | 0.0000    | -0.511              | 0.303 5.143  |              |
| 10/15/2013 15:54 0917-173, No13_10_15_1554_59_221  | 1      | 0.961    | 0.927      | 0.027          | 0.051              | -0.0320            | 0.0480                   | 0.397              | 1.095              |                 |                    | -0.1490               | 0.084     | -0.0000                   | 0.0000    | 0.445               | 0.280 0.791  |              |
| 10/15/2013 15:55 0917-173, No13_10_15_1555_59_931  | 1      | 3.437    | 0.912      | 0.037          | 0.052              | -0.0120            | 0.0500                   | 0.5600             | 1.091              |                 |                    | -0.002                | 0.085     | -0.0010                   | 0.0000    | 0.105               | 0.282 0.58   |              |
| 10/15/2013 15:56 0917-173, No13_10_15_1556_59_701  | 1      | 1.382    | 1.003      | 0.035          | 0.054              | -0.0140            | 0.0490                   | 0.5740             | 1.092              |                 |                    | -0.152                | 0.090     | -0.0040                   | 0.0000    | -0.621              | 0.301 0.508  |              |
| 10/15/2013 15:57 0917-173, No13_10_15_1557_59_531  | 1      | 1.349    | 0.953      | 0.040          | 0.0490             | -0.0510            | 0.0490                   | 0.6150             | 1.087              |                 |                    | 0.096                 | 0.084     | -0.0060                   | 0.0000    | -0.445              | 0.283 0.465  |              |
| 10/15/2013 15:58 0917-173, No13_10_15_1558_59_231  | 1      | 1.674    | 0.990      | -0.001         | 0.053              | 0.0350             | 0.0490                   | 0.5530             | 1.100              |                 |                    | -0.048                | 0.090     | -0.0050                   | 0.0000    | -0.360              | 0.296 0.442  |              |
| 10/15/2013 15:59 0917-173, No13_10_15_1559_59_001  | 1      | 2.0630   | 0.957      | 0.129          | 0.053              | -0.0190            | 0.0500                   | 0.5250             | 1.098              |                 |                    | -0.100                | 0.089     | -0.0010                   | 0.0000    | -0.310              | 0.298 0.457  |              |
| 10/15/2013 16:00 0917-173, No13_10_15_1600_59_721  | 1      | 0.997    | 0.945      | 0.007          | 0.051              | -0.072             | 0.0490                   | 0.454              | 1.114              |                 |                    | -0.054                | 0.085     | -0.0040                   | 0.0000    | -0.067              | 0.291 0.507  |              |
| 10/15/2013 16:01 0917-173, No13_10_15_1601_59_521  | 1      | 1.614    | 0.951      | 0.010          | 0.053              | -0.081             | 0.0500                   | 0.5040             | 1.098              |                 |                    | -0.014                | 0.087     | 0.0                       | 0.0000    | -0.338              | 0.290 0.484  |              |
| 10/15/2013 16:02 0917-173, No13_10_15_1602_59_231  | 1      | 0.451    | 0.935      | -0.067         | 0.053              | 0.022              | 0.0460                   | 0.5730             | 1.098              |                 |                    | 0.001                 | 0.087     | -0.00300                  | 0.0000    | 0.62                | 0.285 0.439  |              |
| 10/15/2013 16:03 0917-173, No13_10_15_1603_59_982  | 1      | 2.959    | 0.927      | 0.032          | 0.052              | -0.057             | 0.0510                   | 0.408              | 1.099              |                 |                    | -0.018                | 0.085     | 0.0                       | 0.0000    | 0.286               | 0.286 0.383  |              |
| 10/15/2013 16:04 0917-173, No13_10_15_1604_59_802  | 1      | 1.1840   | 0.951      | 0.043          | 0.053              | 0.0350             | 0.0480                   | 0.5550             | 1.097              |                 |                    | -0.080                | 0.087     | 0.0                       | 0.0000    | -0.058              | 0.291 0.317  |              |
| 10/15/2013 16:05 0917-173, No13_10_15_1605_59_512  | 1      | 2.695    | 0.978      | 0.024          | 0.053              | 0.0020             | 0.0490                   | 0.384              | 1.097              |                 |                    | -0.024                | 0.087     | -0.0010                   | 0.0000    | -0.728              | 0.293 0.548  |              |
| 10/15/2013 16:06 0917-173, No13_10_15_1606_59_1362 | 1      | 1.7420   | 1.006      | 0.022          | 0.052              | -0.030             | 0.0510                   | 0.401              | 1.104              |                 |                    | -0.025                | 0.087     | -0.0040                   | 0.0000    | -0.175              | 0.301 0.734  |              |
| 10/15/2013 16:07 0917-173, No13_10_15_1607_59_202  | 1      | 2.162    | 0.955      | 0.071          | 0.052              | -0.044             | 0.0500                   | 0.455              | 1.091              |                 |                    | 0.028                 | 0.087     | 0.0                       | 0.0000    | -0.002              | 0.292 0.314  |              |
| 10/15/2013 16:08 0917-173, No13_10_15_1608_59_842  | 1      | 1.624    | 0.986      | 0.037          | 0.052              | -0.045             | 0.0490                   | 0.5670             | 1.098              |                 |                    | -0.005                | 0.088     | -0.0050                   | 0.0000    | 0.031               | 0.302 0.353  |              |
| 10/15/2013 16:09 0917-173, No13_10_15_1609_59_1572 | 1      | 1.5810   | 1.032      | 0.058          | 0.054              | -0.044             | 0.0480                   | 0.441              | 1.105              |                 |                    | 0.041                 | 0.090     | 0.0                       | 0.0000    | -0.127              | 0.306 0.381  |              |
| 10/15/2013 16:10 0917-173, No13_10_15_1610_59_439  | 1      | 3.471    | 0.855      | 0.143          | 0.051              | -0.0400            | 0.0470                   | 0.6010             | 1.101              |                 |                    | -0.017                | 0.084     | -0.01                     | 0.0000    | -0.425              | 0.279 0.372  |              |
| 10/15/2013 16:11 0917-173, No13_10_15_1611_59_062  | 1      | 3.088    | 0.923      | 0.047          | 0.052              | -0.0150            | 0.0480                   | 0.520              | 1.100              |                 |                    | -0.042                | 0.085     | 0.0                       | 0.0000    | -0.368              | 0.280 0.385  |              |
| 10/15/2013 16:12 0917-173, No13_10_15_1612_59_872  | 1      | 1.787    | 1.000      | 0.038          | 0.055              | -0.050             | 0.0490                   | 0.6030             | 1.101              |                 |                    | -0.0260               | 0.092     | -0.0030                   | 0.0000    | 0.1930              | 0.309 0.556  |              |
| 10/15/2013 16:13 0917-173, No13_10_15_1613_59_622  | 1      | 1.5680   | 1.052      | -0.017         | 0.054              | -0.0320            | 0.0490                   | 0.501              | 1.108              |                 |                    | 0.111                 | 0.090     | 0.0                       | 0.0000    | -0.373              | 0.307 0.709  |              |
| 10/15/2013 16:14 0917-173, No13_10_15_1614_59_242  | 1      | 3.652    | 0.921      | -0.006         | 0.052              | -0.0250            | 0.0480                   | 0.568              | 1.116              |                 |                    | 0.057                 | 0.092     | -0.0060                   | 0.0000    | -0.286              | 0.293 0.423  |              |
| 10/15/2013 16:15 0917-173, No13_10_15_1615_59_744  | 1      | 1.0      | 1.3        | 0.120          | 0.076              | 0.37               | 1.24                     | -0.180             | 0.0860             | 0.063           | 0.121              | 0.047                 | 0.055     | 0.163                     | 0.379     | -1.551              |              |              |
| 10/15/2013 16:27 0917-173, No13_10_15_1627_59_254  | 1      | 1.1      | 1.3        | -0.032         | 0.069              | -0.36              | 1.32                     | 0.062              | 0.0950             | 0.024           | 0.111              | 0.047                 | 0.132     | 0.64                      | 0.383     | -1.653              |              |              |
| 10/15/2013 16:27 0917-173, No13_10_15_1627_59_754  | 1      | 2.7      | 1.2        | 0.0180         | 0.070              | -0.37              | 1.36                     | 0.070              | 0.0850             | -0.030          | 0.114              | 0.048                 | 0.146     | -0.747                    | 0.373     | -1.713              |              |              |
| 10/15/2013 16:28 0917-173, No13_10_15_1628_59_384  | 1      | 0.4      | 1.2        | 0.0010         | 0.072              | 0.010              | 0.070                    | 0.080              | 0.053              | 0.114           | 0.112              | 0.046                 | 0.146     | 0.374                     | 0.381     | -1.693              |              |              |
| 10/15/2013 16:28 0917-173, No13_10_15_1628_59_854  | 1      | -2.2     | 1.3        | 0.024          | 0.067              | -0.38              | 1.39                     | -0.2300            | 0.0820             | 0.10600         | 0.113              | 0.052                 | 0.156     | -0.613                    | 0.371     | -1.748              |              |              |
| 10/15/2013 16:28 0917-173, No13_10_15_1628_59_344  | 1      | 0.3      | 1.2        | 0.0400         | 0.070              | -0.30              | 1.40                     | 0.239              | 0.0900             | -0.1270         | 0.111              | 0.050                 | 0.153     | -0.271                    | 0.365     | -1.768              |              |              |
| 10/15/2013 16:29 0917-173, No13_10_15_1629_59_464  | 1      | 0.3      | 1.2        | 0.0176         | 0.071              | -0.30              | 1.40                     | 0.239              | 0.0900             | -0.1270         | 0.111              | 0.050                 | 0.153     | -0.271                    | 0.365     | -1.768              |              |              |
| 10/15/2013 16:29 0917-173, No13_10_15_1629_59_464  | 1      | -0.2     | 1.2        | -0.026         | 0.067              | -0.40              | 1.40                     | -0.0280            | 0.0980             | -0.144          | 0.109              | 0.052                 | 0.155     | -0.436                    | 0.361     | -1.776              |              |              |
| 10/15/2013 16:29 0917-173, No13_10_15_1629_59_084  | 1      | -0.5     | 1.3        | 0.2340         | 0.073              | -0.44              | 1.40                     | 0.0580             | 0.0950             | 0.277           | 0.117              | 0.054                 | 0.161     | 0.449                     | 0.371     | -1.749              |              |              |
| 10/15/2013 16:30 0917-173, No13_10_15_1630_59_504  | 1      | 0.3      | 1.3        | 0.16600        | 0.076              | -0.44              | 1.40                     | 0.0730             | 0.0830             | 0.086           | 0.122              | 0.043                 | 0.156     | -0.75                     | 0.399     | -1.759              |              |              |
| 10/15/2013 16:30 0917-173, No13_10_15_1630_59_004  | 1      | -1.1     | 1.2        | 0.2160         | 0.069              | 0.41               | 1.40                     | 0.078              | 0.078              | 0.118           | 0.112              | 0.057                 | 0.161     | 0.350                     | 0.391     | -1.751              |              |              |
| 10/15/2013 16:30 0917-173, No13_10_15_1630_59_654  | 1      | -1.3     | 1.3        | 0.215          | 0.071              | -0.35              | 1.40                     | -0.001             | 0.0920             | 0.224           | 0.119              | 0.045                 | 0.157     | -0.91                     | 0.400     | -1.772              |              |              |
| 10/15/2013 16:31 0917-173, No13_10_15_1631_59_124  | 1      | -1.3     | 1.2        | -0.01900       | 0.070              | -0.46              | 1.40                     | -0.01700           | 0.0920             | 0.172           | 0.115              | 0.045                 | 0.156     | -0.374                    | 0.378     | -1.781              |              |              |
| 10/15/2013 16:31 0917-173, No13_10_15_1631_59_734  | 1      | -1.1     | 1.2        | 0.018          | 0.068              | -0.474             | 1.40                     | -0.018             | 0.0880             | 0.074           | 0.116              | 0.046                 | 0.156     | -0.380                    | 0.380     | -1.757              |              |              |
| 10/15/2013 16:31 0917-173, No13_10_15_1631_59_234  | 1      | -1.3     | 1.2        | 0.010          | 0.073              | -0.45              | 1.40                     | -0.185             | 0.0830             | 0.210           | 0.117              | 0.037                 | 0.156     | -0.37                     | 0.378     | -1.769              |              |              |
| 10/15/2013 16:31 0917-173, No13_10_15_1631_59_744  | 1      | -3.4     | 1.3        | 0.027          | 0.072              | -0.41              | 1.39                     | -0.028             | 0.0880             | -0.147          | 0.118              | 0.043                 | 0.159     | 0.2630                    | 0.385     | -1.759              |              |              |
| 10/15/2013 17:05 0917-173, No13_10_15_1705_46_267  | 1      | -2.54    | 1.372      | 0.096          | 0.172              | 3.70               | 0.138                    | -0.236             | 1.87               | -2.16           | 0.62               | -0.0090               | 0.0040    | -3.5                      | 0.51      | 90.213              |              |              |
| 10/15/2013 17:06 0917-173, No13_10_15_1706_46_971  | 1      | -0.02    | 1.27       | 0.127          | 0.173              | 3.68               | 0.137                    | -0.187             | 1.84               | -1.97           | 0.64               | -0.0070               | 0.0040    | -3.0                      | 0.50      | 92.492              |              |              |
| 10/15/2013 17:07 0917-173, No13_10_15_1707_47_767  | 1      | -0.02    | 1.307      | 0.810          | 0.169              | 3.61               | 0.139                    | -0.12              | 1.87               | -2.00           | 0.64               | -0.0060               | 0.0050    | -3.5                      | 0.52      | 92.173              |              |              |
| 10/15/2013 17:08 0917-173, No13_10_15_1708_48_517  | 1      | -2.76    | 1.439      | 0.673          | 0.172              | 3.70               | 0.141                    | -0.106             | 1.87               | -2.10           | 0.64               | -0.0090               | 0.0050    | -3.5                      | 0.52      | 93.885              |              |              |
| 10/15/2013 17:09 0917-173, No13_10_15_1709_48_367  | 1      | -2.66    | 1.156      | 0.164          | 0.176              | 3.62               | 0.146                    | -0.104             | 1.86               | -2.17           | 0.64               | -0.0090               | 0.0050    | -3.5                      | 0.52      | 94.47               |              |              |
| 10/15/2013 17:10 0917-173, No13_10_15_1710_50_907  | 1      | -2.10    | 1.315      | 0.635          | 0.182              | 3.72               | 0.144                    | -0.215             | 1.89               | -2.34           | 0.69               | -0.0040               | 0.0050    | -3.6                      | 0.53      | 98.536              |              |              |
| 10/15/2013 17:11 0917-173, No13_10_15_1711_50_897  | 1      | -2.12    | 1.315      | 0.688          | 0.179              | 3.63               | 0.145                    | -0.296             | 1.87               | -2.31           | 0.68               | -0.0110               | 0.0050    | -4.1                      | 0.51      | 99.459              |              |              |
| 10/15/2013 17:12 0917-173, No13_10_15_1712_50_167  | 1      | -2.30    | 1.395      | 0.647          | 0.183              | 3.53               | 0.141                    | -0.348             | 1.87               | -2.16           | 0.70               | -0.0090               | 0.0050    | -4.1                      | 0.54      | 100.827             |              |              |
| 10/15/2013 17:13 0917-173, No13_10_15_1713_50_267  | 1      | -2.14    | 1.361      | 0.680          | 0.186              | 3.61               | 0.148                    | -0.388             | 1.86               | -2.14           | 0.68               | -0.0080               | 0.0050    | -4.0                      | 0.53      | 101.943             |              |              |
| 10/15/2013 17:14 0917-173, No13_10_15_1714_53_138  | 1      | -1.26    | 1.272      | 0.715          | 0.184              | 3.36               | 0.141                    | -0.383             | 1.86               | -1.77           | 0.69               | -0.0050               | 0.0050    | -4.5                      | 0.53      | 100.718             |              |              |
| 10/15/2013 17:15 0917-173, No13_10_15_1715_53_758  | 1      | -0.67    | 1.306      | 0.794          | 0.182              | 3.22               | 0.139                    | -0.169             | 1.87               | -1.32           | 0.68               | -0.0080               | 0.0050    | -4.7                      | 0.55      | 100.097             |              |              |
| 10/15/2013 17:16 0917-173, No13_10_15_1716_54_528  | 1      | -1.78    | 1.430      | 0.858          | 0.177              | 3.17               | 0.139                    | -0.232             | 1.88               | -1.02           | 0.67               | -0.0070               | 0.0050    | -4.7                      | 0.54      | 98.764              |              |              |
| 10/15/2013 17:17 0917-173, No13_10_15_1717_55_268  | 1      | -1.87    | 1.396      | 0.874          | 0.178              | 3.074              | 0.138                    | -0.074             | 1.89               | -1.17           | 0.67               | -0.0070               | 0.0050    | -4.7                      | 0.54</    |                     |              |              |

| Location                                          | Disc.  | #        | Start/Stop | Instrument     | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                    |           |             |      |
|---------------------------------------------------|--------|----------|------------|----------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|--------------------|-----------|-------------|------|
| Date                                              | Method | Filename | OF         | Acrolein (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur Hexafluoride (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) | pinene (pp) |      |
| 10/15/2013 18:05 0917-173, No13_10_15_1805_20_181 | 1      | -0.78    | 1.363      | 0.020          | 0.198              | 2.75               | 1.146                    | -0.342             | 1.85               | -2.20           | 0.77               | -0.0070               | 0.0050    | -4.6                      | 0.56      | 109.324            | -5.2      | 0.56        |      |
| 10/15/2013 18:56 0917-173, No13_10_15_1856_20_907 | 1      | -3.15    | 1.309      |                | 0.734              | 0.198              | 2.73                     | 0.144              | -0.249             | 1.84            | -2.33              | 0.76                  | -0.0070   | 0.0050                    | -4.5      | 0.57               | 112.503   | -4.5        | 0.57 |
| 10/15/2013 18:57 0917-173, No13_10_15_1857_21_717 | 1      | -0.79    | 1.306      |                | 0.743              | 0.197              | 2.75                     | 0.147              | -0.346             | 1.85            | -2.46              | 0.77                  | -0.0040   | 0.0050                    | -4.9      | 0.55               | 114.073   | -4.9        | 0.55 |
| 10/15/2013 18:58 0917-173, No13_10_15_1858_22_447 | 1      | -0.00    | 1.366      |                | 0.808              | 0.198              | 2.72                     | 0.146              | -0.196             | 1.86            | -2.18              | 0.77                  | -0.0060   | 0.0050                    | -5.0      | 0.55               | 113.955   | -5.0        | 0.55 |
| 10/15/2013 18:59 0917-173, No13_10_15_1859_23_207 | 1      | -1.60    | 1.369      |                | 0.928              | 0.202              | 2.75                     | 0.148              | -0.329             | 1.84            | -2.05              | 0.77                  | -0.0090   | 0.0050                    | -4.9      | 0.56               | 113.907   | -4.9        | 0.56 |
| 10/15/2013 19:00 0917-173, No13_10_15_1900_23_947 | 1      | -2.57    | 1.392      |                | 0.924              | 0.203              | 2.73                     | 0.145              | -0.464             | 1.86            | -1.95              | 0.77                  | -0.0050   | 0.0050                    | -5.2      | 0.55               | 113.567   | -5.2        | 0.55 |
| 10/15/2013 19:01 0917-173, No13_10_15_1901_24_647 | 1      | -2.94    | 1.389      |                | 0.995              | 0.202              | 2.82                     | 0.147              | -0.348             | 1.85            | -2.01              | 0.77                  | -0.0040   | 0.0050                    | -5.2      | 0.58               | 114.151   | -5.2        | 0.58 |
| 10/15/2013 19:02 0917-173, No13_10_15_1902_25_437 | 1      | -1.47    | 1.363      |                | 0.920              | 0.198              | 2.75                     | 0.146              | -0.342             | 1.85            | -2.20              | 0.77                  | -0.0070   | 0.0050                    | -4.6      | 0.56               | 114.006   | -4.6        | 0.56 |
| 10/15/2013 19:03 0917-173, No13_10_15_1903_26_167 | 1      | -2.07    | 1.347      |                | 0.844              | 0.208              | 2.80                     | 0.150              | -0.134             | 1.84            | -2.21              | 0.78                  | -0.0060   | 0.0050                    | -5.4      | 0.57               | 115.937   | -5.4        | 0.57 |
| 10/15/2013 19:04 0917-173, No13_10_15_1904_26_967 | 1      | -2.05    | 1.439      |                | 0.836              | 0.199              | 2.82                     | 0.151              | -0.442             | 1.84            | -2.29              | 0.78                  | -0.0030   | 0.0050                    | -4.7      | 0.57               | 116.295   | -4.7        | 0.57 |
| 10/15/2013 19:05 0917-173, No13_10_15_1905_27_078 | 1      | -1.05    | 1.298      |                | 0.909              | 0.204              | 2.78                     | 0.152              | -0.270             | 1.86            | -2.13              | 0.78                  | -0.0020   | 0.0050                    | -5.3      | 0.56               | 115.103   | -5.3        | 0.56 |
| 10/15/2013 19:06 0917-173, No13_10_15_1906_28_368 | 1      | -1.98    | 1.378      |                | 0.889              | 0.204              | 2.80                     | 0.149              | -0.497             | 1.85            | -2.02              | 0.77                  | -0.0030   | 0.0050                    | -5.1      | 0.57               | 115.144   | -5.1        | 0.57 |
| 10/15/2013 19:07 0917-173, No13_10_15_1907_29_148 | 1      | -1.34    | 1.377      |                | 0.841              | 0.202              | 2.80                     | 0.150              | -0.286             | 1.86            | -1.97              | 0.76                  | -0.0070   | 0.0050                    | -4.9      | 0.57               | 112.865   | -4.9        | 0.57 |
| 10/15/2013 19:08 0917-173, No13_10_15_1908_29_878 | 1      | -1.68    | 1.411      |                | 0.869              | 0.195              | 2.79                     | 0.147              | -0.325             | 1.84            | -1.90              | 0.75                  | -0.0050   | 0.0050                    | -5.1      | 0.57               | 111.174   | -5.1        | 0.57 |
| 10/15/2013 19:09 0917-173, No13_10_15_1909_30_628 | 1      | -2.32    | 1.353      |                | 0.807              | 0.190              | 2.73                     | 0.149              | -0.355             | 1.83            | -1.64              | 0.73                  | -0.0080   | 0.0050                    | -4.1      | 0.56               | 109.439   | -4.1        | 0.56 |
| 10/15/2013 19:10 0917-173, No13_10_15_1910_31_308 | 1      | -0.36    | 1.401      |                | 0.723              | 0.188              | 2.74                     | 0.144              | -0.216             | 1.86            | -1.69              | 0.72                  | -0.0060   | 0.0050                    | -4.8      | 0.55               | 107.437   | -4.8        | 0.55 |
| 10/15/2013 19:11 0917-173, No13_10_15_1911_32_168 | 1      | -1.52    | 1.330      |                | 0.800              | 0.187              | 2.69                     | 0.143              | -0.347             | 1.85            | -1.44              | 0.71                  | -0.0050   | 0.0050                    | -4.8      | 0.56               | 105.888   | -4.8        | 0.56 |
| 10/15/2013 19:12 0917-173, No13_10_15_1912_32_878 | 1      | -2.05    | 1.269      |                | 0.770              | 0.184              | 2.78                     | 0.143              | -0.394             | 1.85            | -1.36              | 0.70                  | -0.0060   | 0.0040                    | -4.6      | 0.54               | 105.438   | -4.6        | 0.54 |
| 10/15/2013 19:13 0917-173, No13_10_15_1913_33_668 | 1      | -1.05    | 1.306      |                | 0.768              | 0.187              | 2.71                     | 0.141              | -0.224             | 1.85            | -1.49              | 0.71                  | -0.0010   | 0.0050                    | -4.7      | 0.55               | 106.155   | -4.7        | 0.55 |
| 10/15/2013 19:14 0917-173, No13_10_15_1914_34_358 | 1      | -0.08    | 1.384      |                | 0.890              | 0.180              | 2.80                     | 0.144              | -0.067             | 1.87            | -1.34              | 0.71                  | -0.0060   | 0.0050                    | -4.4      | 0.55               | 106.917   | -4.4        | 0.55 |
| 10/15/2013 19:15 0917-173, No13_10_15_1915_35_158 | 1      | -2.48    | 1.384      |                | 0.776              | 0.183              | 2.65                     | 0.142              | -0.212             | 1.85            | -1.38              | 0.70                  | -0.0090   | 0.0050                    | -4.1      | 0.55               | 106.168   | -4.1        | 0.55 |
| 10/15/2013 19:16 0917-173, No13_10_15_1916_36_878 | 1      | -0.76    | 1.367      |                | 0.895              | 0.189              | 2.66                     | 0.144              | -0.225             | 1.85            | -1.14              | 0.71                  | -0.0000   | 0.0050                    | -4.9      | 0.55               | 105.601   | -4.9        | 0.55 |
| 10/15/2013 19:17 0917-173, No13_10_15_1917_36_589 | 1      | -1.12    | 1.404      |                | 0.818              | 0.182              | 2.61                     | 0.142              | -0.174             | 1.86            | -1.13              | 0.69                  | -0.0040   | 0.0050                    | -4.9      | 0.57               | 104.456   | -4.9        | 0.57 |
| 10/15/2013 19:18 0917-173, No13_10_15_1918_37_339 | 1      | -1.02    | 1.305      |                | 0.939              | 0.185              | 2.56                     | 0.139              | -0.147             | 1.85            | -1.13              | 0.69                  | -0.0070   | 0.0050                    | -4.9      | 0.55               | 103.045   | -4.9        | 0.55 |
| 10/15/2013 19:19 0917-173, No13_10_15_1919_38_159 | 1      | -1.27    | 1.366      |                | 0.758              | 0.180              | 2.56                     | 0.137              | -0.383             | 1.85            | -0.77              | 0.67                  | -0.0050   | 0.0050                    | -5.4      | 0.56               | 101.059   | -5.4        | 0.56 |
| 10/15/2013 19:20 0917-173, No13_10_15_1920_38_209 | 1      | -0.79    | 1.475      |                | 0.865              | 0.179              | 2.57                     | 0.139              | -0.189             | 1.86            | -0.89              | 0.68                  | -0.0060   | 0.0050                    | -4.9      | 0.55               | 101.324   | -4.9        | 0.55 |
| 10/15/2013 19:21 0917-173, No13_10_15_1921_39_409 | 1      | -2.64    | 1.402      |                | 0.735              | 0.180              | 2.52                     | 0.137              | -0.187             | 1.85            | -0.88              | 0.67                  | -0.0070   | 0.0050                    | -5.2      | 0.54               | 101.781   | -5.2        | 0.54 |
| 10/15/2013 19:22 0917-173, No13_10_15_1922_40_209 | 1      | -3.37    | 1.422      |                | 0.834              | 0.183              | 2.53                     | 0.139              | -0.033             | 1.85            | -0.98              | 0.67                  | -0.0040   | 0.0050                    | -4.7      | 0.55               | 101.771   | -4.7        | 0.55 |
| 10/15/2013 19:23 0917-173, No13_10_15_1923_41_009 | 1      | -3.53    | 1.330      |                | 0.775              | 0.179              | 2.53                     | 0.138              | -0.240             | 1.85            | -0.97              | 0.68                  | -0.0040   | 0.0050                    | -4.7      | 0.56               | 102.066   | -4.7        | 0.56 |
| 10/15/2013 19:24 0917-173, No13_10_15_1924_41_719 | 1      | -1.06    | 1.427      |                | 0.807              | 0.180              | 2.49                     | 0.136              | -0.207             | 1.86            | -1.06              | 0.67                  | -0.0050   | 0.0050                    | -5.1      | 0.53               | 102.613   | -5.1        | 0.53 |
| 10/15/2013 19:25 0917-173, No13_10_15_1925_43_529 | 1      | -0.02    | 1.293      |                | 0.642              | 0.181              | 2.41                     | 0.139              | -0.236             | 1.85            | -0.99              | 0.68                  | -0.0050   | 0.0050                    | -5.1      | 0.53               | 102.668   | -5.1        | 0.53 |
| 10/15/2013 19:26 0917-173, No13_10_15_1926_43_249 | 1      | -2.39    | 1.373      |                | 0.768              | 0.182              | 2.45                     | 0.139              | -0.138             | 1.86            | -0.91              | 0.68                  | -0.0020   | 0.0050                    | -5.5      | 0.56               | 101.896   | -5.5        | 0.56 |
| 10/15/2013 19:27 0917-173, No13_10_15_1927_43_949 | 1      | -1.98    | 1.318      |                | 0.719              | 0.180              | 2.51                     | 0.139              | -0.084             | 1.86            | -1.13              | 0.68                  | -0.0040   | 0.0050                    | -5.1      | 0.53               | 102.166   | -5.1        | 0.53 |
| 10/15/2013 19:28 0917-173, No13_10_15_1928_44_689 | 1      | -2.23    | 1.332      |                | 0.692              | 0.182              | 2.58                     | 0.140              | -0.206             | 1.85            | -1.42              | 0.69                  | -0.0050   | 0.0050                    | -4.9      | 0.53               | 102.039   | -4.9        | 0.53 |
| 10/15/2013 19:29 0917-173, No13_10_15_1929_45_530 | 1      | -1.00    | 1.336      |                | 0.585              | 0.186              | 2.60                     | 0.144              | -0.252             | 1.84            | -1.71              | 0.69                  | -0.0050   | 0.0050                    | -4.2      | 0.54               | 103.539   | -4.2        | 0.54 |
| 10/15/2013 19:30 0917-173, No13_10_15_1930_46_270 | 1      | -1.96    | 1.306      |                | 0.666              | 0.190              | 2.78                     | 0.145              | -0.183             | 1.85            | -1.96              | 0.71                  | -0.0060   | 0.0050                    | -4.0      | 0.54               | 105.124   | -4.0        | 0.54 |
| 10/15/2013 19:31 0917-173, No13_10_15_1931_47_030 | 1      | -1.25    | 1.388      |                | 0.674              | 0.182              | 2.85                     | 0.148              | -0.229             | 1.85            | -0.71              | 0.68                  | -0.0040   | 0.0050                    | -4.2      | 0.56               | 105.707   | -4.2        | 0.56 |
| 10/15/2013 19:32 0917-173, No13_10_15_1932_47_740 | 1      | -0.79    | 1.354      |                | 0.653              | 0.196              | 2.92                     | 0.150              | -0.27              | 1.85            | -2.04              | 0.72                  | -0.0090   | 0.0050                    | -4.5      | 0.52               | 106.311   | -4.5        | 0.52 |
| 10/15/2013 19:33 0917-173, No13_10_15_1933_48_540 | 1      | -1.71    | 1.393      |                | 0.608              | 0.191              | 2.96                     | 0.154              | -0.18              | 1.86            | -2.21              | 0.72                  | -0.0060   | 0.0050                    | -4.2      | 0.54               | 106.244   | -4.2        | 0.54 |
| 10/15/2013 19:34 0917-173, No13_10_15_1934_48_250 | 1      | -0.46    | 1.325      |                | 0.607              | 0.190              | 2.93                     | 0.154              | -0.023             | 1.86            | -1.44              | 0.71                  | -0.0090   | 0.0050                    | -3.4      | 0.52               | 104.934   | -3.4        | 0.52 |
| 10/15/2013 19:35 0917-173, No13_10_15_1935_50_070 | 1      | -1.89    | 1.388      |                | 0.5660             | 0.187              | 2.89                     | 0.151              | -0.464             | 1.86            | -2.30              | 0.70                  | -0.0060   | 0.0050                    | -4.0      | 0.54               | 103.378   | -4.0        | 0.54 |
| 10/15/2013 19:36 0917-173, No13_10_15_1936_50_850 | 1      | -1.43    | 1.333      |                | 0.711              | 0.181              | 2.86                     | 0.145              | -0.26              | 1.85            | -1.75              | 0.68                  | -0.0080   | 0.0050                    | -4.1      | 0.52               | 100.668   | -4.1        | 0.52 |
| 10/15/2013 19:37 0917-173, No13_10_15_1937_51_560 | 1      | -0.96    | 1.293      |                | 0.602              | 0.172              | 2.85                     | 0.148              | -0.255             | 1.85            | -1.92              | 0.66                  | -0.0030   | 0.0050                    | -3.4      | 0.51               | 99.312    | -3.4        | 0.51 |
| 10/15/2013 19:38 0917-173, No13_10_15_1938_52_360 | 1      | -0.72    | 1.374      |                | 0.672              | 0.174              | 2.72                     | 0.140              | -0.274             | 1.85            | -1.81              | 0.72                  | -0.0040   | 0.0050                    | -4.1      | 0.52               | 98.215    | -4.1        | 0.52 |
| 10/15/2013 19:39 0917-173, No13_10_15_1939_53_120 | 1      | -0.27    | 1.416      |                | 0.653              | 0.177              | 2.71                     | 0.139              | -0.069             | 1.86            | -1.60              | 0.64                  | -0.0040   | 0.0050                    | -3.9      | 0.52               | 96.431    | -3.9        | 0.52 |
| 10/15/2013 19:40 0917-173, No13_10_15_1940_53_831 | 1      | -1.58    | 1.282      |                | 0.708              | 0.172              | 2.71                     | 0.137              | -0.019             | 1.85            | -1.48              | 0.64                  | -0.0070   | 0.0050                    | -4.0      | 0.49               | 95.096    | -4.0        | 0.49 |
| 10/15/2013 19:41 0917-173, No13_10_15_1941_54_591 | 1      | -2.81    | 1.361      |                | 0.666              | 0.176              | 2.69                     | 0.136              | -0.159             | 1.86            | -0.93              | 0.63                  | -0.0090   | 0.0040                    | -3.5      | 0.49               | 91.853    | -3.5        | 0.49 |
| 10/15/2013 19:42 0917-173, No13_10_15_1942_55_311 | 1      | -1.58    | 1.447      |                | 0.705              | 0.167              | 2.64                     | 0.136              | -0.093             | 1.85            | -1.52              | 0.62                  | -0.0060   | 0.0040                    | -3.7      | 0.53               | 93.003    | -3.7        | 0.53 |
| 10/15/2013 19:43 0917-173, No13_10_15_1943_56_131 | 1      | 0.35     | 1.388      |                | 0.665              | 0.166              | 2.66                     | 0.139              | -0.104             | 1.86            | -1.59              | 0.62                  | -0.0100   | 0.0040                    | -3.8      | 0.51               | 93.545    | -3.8        | 0.51 |
| 10/15/2013 19:44 0917-173, No13_10_15_1944_56_911 | 1      | -0.00    | 1.376      |                | 0.715              | 0.170              | 2.65                     | 0.136              | -0.019             | 1.85            | -1.45              | 0.63                  | -0.0040   | 0.0040                    | -3.3      | 0.49               | 92.959    | -3.3        | 0.49 |
| 10/15/2013 19:45 0917-173, No13_10_15_1945_57_145 | 1      | -1.05    | 1.319      |                | 0.735              | 0.169              | 2.59                     | 0.137              | -0.044             | 1.86            | -1.61              | 0.63                  | -0.0070   | 0.0040                    | -3.5      | 0.51               | 91.861    | -3.5        | 0.51 |
| 10/15/2013 19:46 0917-173, No13_10_15_1946_58_371 | 1      | -0.70    | 1.375      |                | 0.725              | 0.167              | 2.49                     | 0.133              | -0.012             | 1.85            | -1.30              | 0.61                  | -0.0080   | 0.0040                    | -3.3      | 0.51               | 91.458    | -3.3        | 0.51 |
| 10/15/2013 19:47 0917-173, No13_10_15_1947_59_161 | 1      | 0.75     | 1.382      |                | 0.751              | 0.161              | 2.52                     | 0.132              | -0.039             | 1.85            | -1.16              | 0.60                  | -0.0080   |                           |           |                    |           |             |      |

| Location                                          | Disc.  | #        | Start/Stop | Instrument     | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Splice | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                    |           |              |
|---------------------------------------------------|--------|----------|------------|----------------|--------------------|--------------------|---------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|--------------------|-----------|--------------|
| Date                                              | Method | Filename | DF         | Acroline (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                 | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur Hexafluoride (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/15/2013 21:30 0917-173, No13_10_15_2130_22_484 | 1      | 4.25     | 2.455      | 0.03           | 0.140              | -0.0900            | 0.116                     | 0.41               | 1.701              | -0.403          | 0.227              | -0.0000               | 0.0000    | -0.0000                   | 0.0000    | -0.53              | 0.73      | 0.234        |
| 10/15/2013 21:30 0917-173, No13_10_15_2130_26_654 | 1      | -1.958   | 2.624      | -0.075         | 0.137              | -0.215             | 0.119                     | 0.607              | 1.660              | 0.17            | 0.230              | -0.0150               | 0.0000    | -1.444                    | 0.77      | 0.279              |           |              |
| 10/15/2013 21:30 0917-173, No13_10_15_2130_34_884 | 1      | 0.597    | 2.615      | 0.044          | 0.140              | -0.2110            | 0.118                     | 0.36               | 1.599              | 0.01900         | 0.212              | -0.0140               | 0.00700   | -0.715                    | 0.80      | 0.217              |           |              |
| 10/15/2013 21:30 0917-173, No13_10_15_2130_47_144 | 1      | -1.897   | 2.547      | 0.060          | 0.146              | -0.082             | 0.121                     | 1.006              | 1.504              | -0.170          | 0.235              | -0.0130               | 0.00700   | -0.1410                   | 0.78      | 0.198              |           |              |
| 10/15/2013 21:30 0917-173, No13_10_15_2130_53_364 | 1      | -2.69    | 2.731      | 0.059          | 0.147              | -0.211             | 0.119                     | 0.844              | 1.453              | -0.370          | 0.242              | -0.01800              | 0.0000    | -0.400                    | 0.80      | 0.194              |           |              |
| 10/15/2013 21:30 0917-173, No13_10_15_2130_59_554 | 1      | -0.148   | 2.645      | -0.003         | 0.145              | -0.0080            | 0.117                     | 0.527              | 1.366              | -0.043          | 0.239              | -0.02                 | 0.0000    | 0.013                     | 0.79      | 0.19               |           |              |
| 10/15/2013 21:31 0917-173, No13_10_15_2131_06_784 | 1      | -1.309   | 2.727      | 0.079          | 0.136              | -0.090             | 0.121                     | 0.546              | 1.285              | -0.12           | 0.230              | -0.00300              | 0.00700   | -1.068                    | 0.77      | 0.12               |           |              |
| 10/15/2013 21:31 0917-173, No13_10_15_2131_11_964 | 1      | -0.445   | 2.563      | -0.028         | 0.151              | -0.330             | 0.112                     | 0.628              | 1.24               | -0.173          | 0.241              | -0.00300              | 0.0000    | -0.344                    | 0.80      | 0.109              |           |              |
| 10/15/2013 21:31 0917-173, No13_10_15_2131_18_044 | 1      | -0.583   | 3.030      | -0.162         | 0.151              | -0.239             | 0.125                     | 0.586              | 1.12               | -0.310          | 0.239              | -0.01500              | 0.00700   | -1.86                     | 0.86      | 0.06               |           |              |
| 10/15/2013 21:31 0917-173, No13_10_15_2131_24_444 | 1      | -2.06    | 2.591      | -0.116         | 0.154              | -0.1590            | 0.121                     | 0.584              | 1.10               | 0.462           | 0.246              | -0.01500              | 0.00700   | -3.07                     | 0.81      | 0.025              |           |              |
| 10/15/2013 21:31 0917-173, No13_10_15_2131_30_434 | 1      | -4.511   | 2.655      | -0.080         | 0.148              | -0.260             | 0.123                     | 1.932              | 1.08               | -0.066          | 0.242              | -0.0040               | 0.0000    | -1.96                     | 0.81      | -0.016             |           |              |
| 10/15/2013 21:31 0917-173, No13_10_15_2131_36_724 | 1      | -1.643   | 3.007      | 0.294          | 0.156              | -0.519             | 0.125                     | 0.42               | 1.04               | -0.34           | 0.260              | -0.00700              | 0.00700   | -2.79                     | 0.87      | 0.025              |           |              |
| 10/15/2013 21:31 0917-173, No13_10_15_2131_42_884 | 1      | -3.156   | 2.864      | -0.356         | 0.141              | -0.1130            | 0.128                     | 1.164              | 1.15               | 0.04            | 0.243              | -0.01900              | 0.00700   | -1.07                     | 0.81      | 0.064              |           |              |
| 10/15/2013 21:31 0917-173, No13_10_15_2131_49_014 | 1      | -0.108   | 2.895      | -0.186         | 0.152              | -0.205             | 0.118                     | 1.201              | 1.20               | -0.263          | 0.242              | -0.01000              | 0.00700   | -0.895                    | 0.86      | 0.124              |           |              |
| 10/15/2013 21:31 0917-173, No13_10_15_2131_55_204 | 1      | 4.43     | 2.718      | -0.152         | 0.160              | -0.1120            | 0.118                     | 0.746              | 1.20               | 0.380           | 0.257              | 0.00900               | 0.00700   | -0.60                     | 0.82      | 0.061              |           |              |
| 10/15/2013 21:32 0917-173, No13_10_15_2132_01_384 | 1      | -3.495   | 2.727      | 0.2860         | 0.150              | -0.1200            | 0.125                     | 1.175              | 1.263              | -0.039          | 0.247              | -0.01100              | 0.00600   | -1.55                     | 0.84      | 0.124              |           |              |
| 10/15/2013 21:32 0917-173, No13_10_15_2132_07_574 | 1      | -4.214   | 2.791      | 0.286          | 0.146              | -0.0680            | 0.124                     | 1.165              | 1.334              | 0.05            | 0.243              | -0.00700              | 0.00600   | -1.38                     | 0.85      | 0.146              |           |              |
| 10/15/2013 21:32 0917-173, No13_10_15_2132_13_664 | 1      | -0.843   | 2.719      | 0.077          | 0.147              | -0.1130            | 0.120                     | 0.859              | 1.277              | 0.045           | 0.245              | -0.01600              | 0.00700   | -1.477                    | 0.80      | 0.116              |           |              |
| 10/15/2013 21:32 0917-173, No13_10_15_2132_19_844 | 1      | -4.077   | 3.015      | 0.170          | 0.149              | -0.119             | 0.126                     | 1.152              | 1.329              | 0.10            | 0.253              | -0.01500              | 0.00700   | -2.28                     | 0.88      | 0.23               |           |              |
| 10/15/2013 21:32 0917-173, No13_10_15_2132_26_064 | 1      | 0.007    | 2.945      | 0.255          | 0.143              | -0.186             | 0.119                     | 1.082              | 1.296              | -0.110          | 0.244              | 0.00800               | 0.00600   | -2.12                     | 0.83      | 0.221              |           |              |
| 10/15/2013 21:32 0917-173, No13_10_15_2132_32_244 | 1      | -3.023   | 2.797      | 0.020          | 0.145              | -0.189             | 0.122                     | 1.078              | 1.335              | -0.276          | 0.242              | -0.01000              | 0.00600   | -1.66                     | 0.80      | 0.183              |           |              |
| 10/15/2013 21:32 0917-173, No13_10_15_2132_38_444 | 1      | 0.90     | 2.565      | -0.173         | 0.146              | -0.148             | 0.119                     | 0.806              | 1.313              | 0.45            | 0.238              | -0.02000              | 0.00700   | -3.89                     | 0.79      | 0.216              |           |              |
| 10/15/2013 21:32 0917-173, No13_10_15_2132_44_534 | 1      | -0.3340  | 2.773      | 0.090          | 0.153              | -0.0790            | 0.117                     | 0.652              | 1.344              | 0.23            | 0.251              | -0.01200              | 0.00600   | -1.237                    | 0.81      | 0.207              |           |              |
| 10/15/2013 21:32 0917-173, No13_10_15_2132_50_814 | 1      | -2.199   | 2.885      | -0.030         | 0.143              | -0.0660            | 0.127                     | 0.650              | 1.357              | 0.19            | 0.242              | -0.01600              | 0.00700   | -1.078                    | 0.83      | 0.285              |           |              |
| 10/15/2013 21:32 0917-173, No13_10_15_2132_56_984 | 1      | -1.715   | 2.649      | -0.041         | 0.149              | -0.042             | 0.124                     | 0.561              | 1.300              | -0.048          | 0.247              | -0.00700              | 0.00600   | -0.96                     | 0.84      | 0.261              |           |              |
| 10/15/2013 21:33 0917-173, No13_10_15_2133_03_164 | 1      | -2.375   | 2.603      | -0.306         | 0.137              | -0.143             | 0.116                     | 1.347              | 1.235              | -0.03           | 0.226              | -0.00300              | 0.00700   | -1.35                     | 0.744     | 0.272              |           |              |
| 10/15/2013 21:33 0917-173, No13_10_15_2133_09_364 | 1      | -4.084   | 2.714      | -0.176         | 0.148              | -0.1170            | 0.123                     | 1.276              | 1.319              | -0.29           | 0.24               | -0.01000              | 0.00600   | -0.90                     | 0.84      | 0.263              |           |              |
| 10/15/2013 21:33 0917-173, No13_10_15_2133_15_454 | 1      | -1.03    | 2.919      | 0.006          | 0.144              | -0.040             | 0.123                     | 0.993              | 1.290              | -0.055          | 0.248              | -0.01000              | 0.00600   | -0.961                    | 0.86      | 0.302              |           |              |
| 10/15/2013 21:33 0917-173, No13_10_15_2133_21_724 | 1      | -4.870   | 2.649      | -0.140         | 0.147              | -0.140             | 0.124                     | 1.049              | 1.289              | -0.008          | 0.249              | -0.00800              | 0.00600   | -2.344                    | 0.73      | 0.26               |           |              |
| 10/15/2013 21:33 0917-173, No13_10_15_2133_27_854 | 1      | 3.599    | 2.592      | 0.2010         | 0.152              | -0.334             | 0.124                     | 0.729              | 1.284              | 0.03            | 0.24               | -0.01300              | 0.00700   | 0.21                      | 0.83      | 0.27               |           |              |
| 10/15/2013 21:33 0917-173, No13_10_15_2133_34_044 | 1      | -6.035   | 2.672      | -0.193         | 0.155              | -0.0860            | 0.123                     | 0.594              | 1.298              | -0.151          | 0.251              | -0.00600              | 0.00700   | -1.68                     | 0.85      | 0.34               |           |              |
| 10/15/2013 21:33 0917-173, No13_10_15_2133_40_214 | 1      | -1.110   | 2.112      | -0.121         | 0.152              | -0.121             | 0.121                     | 0.584              | 1.288              | -0.217          | 0.247              | -0.00900              | 0.00600   | -1.344                    | 0.83      | 0.297              |           |              |
| 10/15/2013 21:33 0917-173, No13_10_15_2133_46_344 | 1      | -4.886   | 2.624      | 0.076          | 0.148              | -0.0980            | 0.119                     | 0.923              | 1.332              | -0.205          | 0.241              | -0.00900              | 0.00700   | -0.84                     | 0.77      | 0.349              |           |              |
| 10/15/2013 21:33 0917-173, No13_10_15_2133_52_544 | 1      | -0.101   | 2.753      | 0.1020         | 0.148              | -0.0320            | 0.126                     | 0.744              | 1.427              | -0.19           | 0.244              | -0.00800              | 0.00600   | -2.43                     | 0.83      | 0.298              |           |              |
| 10/15/2013 21:33 0917-173, No13_10_15_2134_08_824 | 1      | 0.5850   | 2.488      | -0.106         | 0.151              | -0.146             | 0.119                     | 0.691              | 1.532              | 0.12            | 0.246              | -0.01300              | 0.00600   | -1.78                     | 0.76      | 0.299              |           |              |
| 10/15/2013 21:34 0917-173, No13_10_15_2134_05_014 | 1      | -2.008   | 2.615      | -0.405         | 0.138              | -0.118             | 0.120                     | 0.788              | 1.07               | -0.008          | 0.247              | -0.00600              | 0.00700   | -1.470                    | 0.79      | 0.19               |           |              |
| 10/15/2013 21:34 0917-173, No13_10_15_2134_11_214 | 1      | -0.218   | 2.622      | 0.103          | 0.155              | 0.0950             | 0.119                     | 0.913              | 1.630              | 0.00            | 0.228              | -0.01600              | 0.00700   | -2.16                     | 0.75      | 0.378              |           |              |
| 10/15/2013 21:34 0917-173, No13_10_15_2134_17_304 | 1      | 5.162    | 2.930      | -0.010         | 0.136              | -0.315             | 0.122                     | 0.892              | 1.676              | 0.34            | 0.221              | -0.00900              | 0.00500   | -3.29                     | 0.74      | 0.381              |           |              |
| 10/15/2013 21:34 0917-173, No13_10_15_2134_23_494 | 1      | -10.234  | 2.311      | -0.212         | 0.145              | -0.212             | 0.145                     | 0.965              | 1.650              | -0.220          | 0.240              | -0.00900              | 0.00500   | -0.40                     | 0.71      | 0.397              |           |              |
| 10/15/2013 21:34 0917-173, No13_10_15_2134_29_674 | 1      | 0.90     | 2.299      | 0.257          | 0.143              | -0.0220            | 0.123                     | 0.910              | 1.728              | -0.057          | 0.226              | -0.00200              | 0.00600   | -1.070                    | 0.70      | 0.406              |           |              |
| 10/15/2013 21:34 0917-173, No13_10_15_2134_35_864 | 1      | 3.815    | 2.554      | 0.28           | 0.129              | -0.051             | 0.150                     | 0.752              | 1.737              | 0.062           | 0.217              | -0.01100              | 0.00600   | -2.48                     | 0.76      | 0.465              |           |              |
| 10/15/2013 21:34 0917-173, No13_10_15_2134_42_064 | 1      | 1.101    | 2.470      | -0.028         | 0.133              | -0.130             | 0.121                     | 0.832              | 1.695              | -0.233          | 0.217              | -0.02300              | 0.00600   | -1.15                     | 0.72      | 0.553              |           |              |
| 10/15/2013 21:34 0917-173, No13_10_15_2134_48_264 | 1      | -4.043   | 2.507      | -0.180         | 0.143              | -0.0400            | 0.123                     | 0.616              | 1.679              | -0.121          | 0.217              | -0.00900              | 0.00600   | -0.87                     | 0.76      | 0.421              |           |              |
| 10/15/2013 21:34 0917-173, No13_10_15_2134_54_354 | 1      | -3.304   | 2.562      | 0.0020         | 0.133              | -0.0360            | 0.123                     | 0.768              | 1.745              | -0.12           | 0.223              | -0.02200              | 0.00600   | -1.46                     | 0.72      | 0.651              |           |              |
| 10/15/2013 21:35 0917-173, No13_10_15_2135_00_544 | 1      | -5.28    | 2.603      | -0.080         | 0.138              | -0.0180            | 0.122                     | 1.202              | 1.592              | 0.43            | 0.213              | -0.00900              | 0.00700   | -1.20                     | 0.79      | 0.472              |           |              |
| 10/15/2013 21:35 0917-173, No13_10_15_2135_06_744 | 1      | -0.485   | 2.736      | -0.045         | 0.139              | -0.061             | 0.115                     | 1.096              | 1.646              | -0.047          | 0.216              | -0.00800              | 0.00600   | -0.803                    | 0.81      | 0.332              |           |              |
| 10/15/2013 21:35 0917-173, No13_10_15_2135_12_934 | 1      | 0.099    | 2.860      | 0.100          | 0.147              | -0.236             | 0.122                     | 0.928              | 1.438              | -0.327          | 0.245              | -0.02                 | 0.0000    | -0.531                    | 0.84      | 0.326              |           |              |
| 10/15/2013 21:35 0917-173, No13_10_15_2135_19_124 | 1      | -0.810   | 2.698      | -0.21          | 0.139              | -0.11800           | 0.125                     | 0.752              | 1.455              | -0.121          | 0.230              | -0.02500              | 0.00700   | -0.904                    | 0.79      | 0.28               |           |              |
| 10/15/2013 21:35 0917-173, No13_10_15_2135_25_284 | 1      | -2.153   | 2.752      | -0.240         | 0.138              | -0.207             | 0.127                     | 0.840              | 1.471              | 0.064           | 0.234              | -0.01                 | 0.00700   | -0.14                     | 0.78      | 0.317              |           |              |
| 10/15/2013 21:35 0917-173, No13_10_15_2135_31_474 | 1      | -1.06    | 2.883      | -0.163         | 0.145              | -0.115             | 0.124                     | 0.536              | 1.441              | -0.044          | 0.239              | -0.00400              | 0.00600   | -0.741                    | 0.80      | 0.334              |           |              |
| 10/15/2013 21:35 0917-173, No13_10_15_2135_37_714 | 1      | -0.559   | 2.705      | -0.025         | 0.138              | -0.337             | 0.124                     | 1.104              | 1.385              | -0.33           | 0.229              | -0.00100              | 0.00700   | -1.19                     | 0.76      | 0.384              |           |              |
| 10/15/2013 21:35 0917-173, No13_10_15_2135_43_964 | 1      | -1.424   | 2.785      | -0.092         | 0.149              | -0.1020            | 0.115                     | 0.985              | 1.448              | -0.178          | 0.244              | -0.00600              | 0.00700   | -0.943                    | 0.83      | 0.38               |           |              |
| 10/15/2013 21:35 0917-173, No13_10_15_2135_50_014 | 1      | 5.929    | 2.561      | 0.077          | 0.138              | -0.126             | 0.129                     | 0.922              | 1.482              | 0.052           | 0.225              | -0.01200              | 0.00700   | -1.315                    | 0.75      | 0.341              |           |              |
| 10/15/2013 21:35 0917-173, No13_10_15_2135_56_204 | 1      | -1.189   | 2.628      | -0.128         | 0.149              | -0.080             | 0.124                     | 0.887              | 1.484              | -0.228          | 0.238              | -0.01000              | 0.00700   | -0.801                    | 0.74      | 0.336              |           |              |
| 10/15/2013                                        |        |          |            |                |                    |                    |                           |                    |                    |                 |                    |                       |           |                           |           |                    |           |              |

| Location                                          | Disc.  | #        | Start/Stop | Instrument     | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                     |           |              |
|---------------------------------------------------|--------|----------|------------|----------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|---------------------|-----------|--------------|
| Date                                              | Method | Filename | OF         | Acroline (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur Hexafluoride (ppm) | SEC (ppm) | acetalddehyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/16/2013 8:15 0917-173, No13_10_16_0815_59_863  | 1      | -0.8     | 1.2        | 0.0580         | 0.071              | -0.45              | 1.38                     | 0.0020             | 0.0810             | -0.270          | 0.115              | 0.058                 | 0.559     | 0.30                      | 0.379     | -1.71               | 0.379     | -1.69        |
| 10/16/2013 8:36 0917-173, No13_10_16_0836_38_370  | 1      | -1.8     | 1.2        | -0.074         | 0.071              | -0.42              | 1.39                     | 0.048              | 0.0770             | -0.1850         | 0.118              | 0.056                 | 0.555     | 0.453                     | 0.373     | -1.745              | 0.453     | -1.745       |
| 10/16/2013 8:36 0917-173, No13_10_16_0836_35_400  | 1      | -0.5     | 1.2        | 0.149          | 0.069              | -0.46              | 1.40                     | -0.0800            | 0.0840             | 0.0630          | 0.110              | 0.050                 | 0.557     | -0.6760                   | 0.374     | -1.706              | -0.6760   | -1.706       |
| 10/16/2013 8:37 0917-173, No13_10_16_0837_14_090  | 1      | 1.4      | 1.3        | 0.0000         | 0.067              | 0.56               | 1.39                     | 0.131              | 0.080              | 0.239           | 0.111              | 0.059                 | 0.554     | 0.361                     | 0.373     | -1.745              | 0.361     | -1.745       |
| 10/16/2013 8:37 0917-173, No13_10_16_0837_32_591  | 1      | 1.8      | 1.2        | -0.0630        | 0.063              | -0.46              | 1.40                     | -0.0090            | 0.0800             | -0.198          | 0.103              | 0.054                 | 0.558     | 0.2700                    | 0.347     | -1.723              | 0.2700    | -1.723       |
| 10/16/2013 8:37 0917-173, No13_10_16_0837_51_001  | 1      | -0.5     | 1.3        | 0.0000         | 0.074              | -0.52              | 1.40                     | -0.0620            | 0.0800             | -0.0700         | 0.119              | 0.061                 | 0.561     | 0.74                      | 0.402     | -1.724              | 0.74      | -1.724       |
| 10/16/2013 8:38 0917-173, No13_10_16_0838_29_461  | 1      | -0.880   | 0.76       | 0.721          | 0.20               | 0.0560             | 0.070                    | 0.110              | 0.080              | 0.054           | 0.116              | 0.054                 | 0.564     | 0.398                     | 0.183     | -1.729              | 0.398     | -1.729       |
| 10/16/2013 8:38 0917-173, No13_10_16_0838_28_111  | 1      | -2.0     | 1.3        | -0.103         | 0.074              | -0.43              | 1.39                     | 0.1150             | 0.0830             | -0.119          | 0.119              | 0.059                 | 0.556     | 0.040                     | 0.387     | -1.725              | 0.040     | -1.725       |
| 10/16/2013 8:38 0917-173, No13_10_16_0838_46_631  | 1      | -0.1     | 1.4        | -0.0600        | 0.064              | -0.52              | 1.40                     | -0.1150            | 0.0800             | 0.222           | 0.112              | 0.063                 | 0.560     | -1.017                    | 0.385     | -1.723              | -1.017    | -1.723       |
| 10/16/2013 8:39 0917-173, No13_10_16_0839_25_251  | 1      | 1.9      | 1.2        | -0.010         | 0.066              | -0.39              | 1.40                     | 0.0560             | 0.0850             | 0.000           | 0.109              | 0.060                 | 0.557     | -0.008                    | 0.361     | -1.737              | -0.008    | -1.737       |
| 10/16/2013 8:39 0917-173, No13_10_16_0839_21_761  | 1      | 1.3      | 0.01       | 0.071          | 0.746              | 0.00               | 0.102                    | 0.080              | 0.115              | 0.022           | 0.115              | 0.054                 | 0.559     | 0.352                     | 0.374     | -1.7                | 0.352     | -1.7         |
| 10/16/2013 8:39 0917-173, No13_10_16_0839_42_371  | 1      | -2.0     | 1.3        | -0.017         | 0.069              | -0.41              | 1.40                     | -0.120             | 0.0850             | 0.056           | 0.113              | 0.054                 | 0.560     | 0.244                     | 0.367     | -1.692              | 0.244     | -1.692       |
| 10/16/2013 8:40 0917-173, No13_10_16_0840_00_791  | 1      | 0.5      | 1.3        | 0.051          | 0.068              | -0.42              | 1.39                     | -0.1190            | 0.0800             | -0.1440         | 0.115              | 0.051                 | 0.561     | 0.414                     | 0.393     | -1.693              | 0.414     | -1.693       |
| 10/16/2013 10:53 0917-173, No13_10_16_1053_00_500 | 1      | -0.8     | 1.013      | 0.000          | 0.052              | 0.651              | 0.070                    | 0.362              | 1.481              | 0.126           | 0.000              | -0.0000               | 0.0000    | 0.61                      | 0.38      | 13.175              | 0.61      | 0.38         |
| 10/16/2013 10:54 0917-173, No13_10_16_1054_04_300 | 1      | -0.08    | 1.057      | 0.067          | 0.057              | 0.468              | 0.0640                   | 0.275              | 1.470              | 0.953           | 0.222              | -0.0020               | 0.0000    | 0.95                      | 0.310     | 13.249              | 0.95      | 0.310        |
| 10/16/2013 10:55 0917-173, No13_10_16_1055_02_170 | 1      | 0.98     | 1.022      | -0.072         | 0.067              | 0.546              | 0.0660                   | 0.332              | 1.471              | -1.334          | 0.150              | -0.0000               | 0.0000    | -0.65                     | 0.322     | 17.959              | -0.65     | 0.322        |
| 10/16/2013 10:56 0917-173, No13_10_16_1056_02_880 | 1      | -2.491   | 1.050      | -0.035         | 0.066              | 0.611              | 0.0710                   | 0.476              | 1.483              | -1.525          | 0.159              | -0.0040               | 0.0000    | -0.62                     | 0.320     | 20.106              | -0.62     | 0.320        |
| 10/16/2013 10:57 0917-173, No13_10_16_1057_00_610 | 1      | -0.20    | 1.028      | 0.155          | 0.065              | 0.600              | 0.070                    | 0.452              | 1.483              | 0.156           | 0.161              | -0.0000               | 0.0000    | 0.84                      | 0.297     | 20.162              | 0.84      | 0.297        |
| 10/16/2013 10:58 0917-173, No13_10_16_1058_04_380 | 1      | -2.168   | 1.042      | -0.032         | 0.071              | 0.689              | 0.0680                   | 0.466              | 1.484              | -1.726          | 0.171              | -0.0000               | 0.0000    | -0.95                     | 0.328     | 22.108              | -0.95     | 0.328        |
| 10/16/2013 10:59 0917-173, No13_10_16_1059_05_200 | 1      | -2.48    | 1.018      | 0.0300         | 0.067              | 0.688              | 0.0680                   | 0.454              | 1.482              | -1.46           | 0.156              | -0.0020               | 0.0000    | -1.12                     | 0.306     | 20.027              | -1.12     | 0.306        |
| 10/16/2013 11:00 0917-173, No13_10_16_1100_06_010 | 1      | -0.63    | 0.963      | 0.046          | 0.053              | 0.747              | 0.0660                   | 0.506              | 1.477              | -1.325          | 0.149              | -0.0000               | 0.0000    | -1.26                     | 0.308     | 19.417              | -1.26     | 0.308        |
| 10/16/2013 11:01 0917-173, No13_10_16_1101_06_701 | 1      | -0.240   | 1.062      | -0.037         | 0.064              | 0.741              | 0.0680                   | 0.305              | 1.461              | -1.625          | 0.161              | -0.0030               | 0.0000    | -0.90                     | 0.317     | 21.197              | -0.90     | 0.317        |
| 10/16/2013 11:02 0917-173, No13_10_16_1102_07_491 | 1      | -0.26    | 1.115      | -0.070         | 0.068              | 0.664              | 0.0680                   | 0.471              | 1.458              | -1.70           | 0.170              | -0.0010               | 0.0000    | -1.17                     | 0.328     | 22.386              | -1.17     | 0.328        |
| 10/16/2013 11:03 0917-173, No13_10_16_1103_08_231 | 1      | -1.69    | 1.097      | 0.050          | 0.065              | 0.694              | 0.0650                   | 0.423              | 1.464              | -1.652          | 0.162              | -0.0020               | 0.0000    | -0.83                     | 0.309     | 21.524              | -0.83     | 0.309        |
| 10/16/2013 11:04 0917-173, No13_10_16_1104_06_041 | 1      | 0.38     | 1.104      | 0.071          | 0.067              | 0.670              | 0.0660                   | 0.463              | 1.466              | -1.572          | 0.164              | -0.0000               | 0.0000    | 0.72                      | 0.328     | 20.951              | 0.72      | 0.328        |
| 10/16/2013 11:05 0917-173, No13_10_16_1105_09_761 | 1      | -1.57    | 1.060      | 0.0050         | 0.065              | 0.702              | 0.0650                   | 0.387              | 1.449              | -1.685          | 0.164              | 0.0010                | 0.0000    | -0.70                     | 0.320     | 22.055              | -0.70     | 0.320        |
| 10/16/2013 11:06 0917-173, No13_10_16_1106_10_521 | 1      | -0.754   | 1.046      | 0.089          | 0.065              | 0.694              | 0.0660                   | 0.529              | 1.445              | -1.855          | 0.170              | 0.000                 | 0.0000    | -0.09                     | 0.326     | 22.797              | -0.09     | 0.326        |
| 10/16/2013 11:07 0917-173, No13_10_16_1107_11_131 | 1      | -1.619   | 1.092      | 0.009          | 0.068              | 0.621              | 0.0660                   | 0.452              | 1.448              | -1.748          | 0.168              | -0.0040               | 0.0000    | -0.20                     | 0.330     | 22.206              | -0.20     | 0.330        |
| 10/16/2013 11:08 0917-173, No13_10_16_1108_12_061 | 1      | -1.557   | 1.054      | 0.005          | 0.066              | 0.690              | 0.0660                   | 0.454              | 1.450              | -1.517          | 0.164              | -0.0000               | 0.0000    | -0.41                     | 0.298     | 19.452              | -0.41     | 0.298        |
| 10/16/2013 11:09 0917-173, No13_10_16_1109_12_311 | 1      | -0.413   | 0.966      | -0.0580        | 0.066              | 0.647              | 0.0680                   | 0.424              | 1.457              | -1.533          | 0.154              | -0.0020               | 0.0000    | -0.57                     | 0.315     | 19.872              | -0.57     | 0.315        |
| 10/16/2013 11:10 0917-173, No13_10_16_1110_13_621 | 1      | -0.40    | 1.065      | -0.055         | 0.067              | 0.655              | 0.0670                   | 0.372              | 1.473              | -1.39           | 0.157              | -0.0040               | 0.0000    | -1.20                     | 0.322     | 20.192              | -1.20     | 0.322        |
| 10/16/2013 11:11 0917-173, No13_10_16_1111_14_401 | 1      | -1.99    | 1.072      | -0.072         | 0.064              | 0.690              | 0.0660                   | 0.449              | 1.455              | -1.447          | 0.160              | -0.0000               | 0.0000    | -1.32                     | 0.328     | 20.528              | -1.32     | 0.328        |
| 10/16/2013 11:12 0917-173, No13_10_16_1112_15_162 | 1      | 0.01     | 0.980      | 0.076          | 0.068              | 0.642              | 0.0690                   | 0.404              | 1.495              | -1.485          | 0.159              | -0.0000               | 0.0000    | -0.50                     | 0.297     | 21.147              | -0.50     | 0.297        |
| 10/16/2013 11:13 0917-173, No13_10_16_1113_15_972 | 1      | 1.30     | 1.058      | -0.0680        | 0.068              | 0.686              | 0.0700                   | 0.429              | 1.499              | -1.649          | 0.166              | -0.0010               | 0.0000    | -0.94                     | 0.325     | 22.052              | -0.94     | 0.325        |
| 10/16/2013 11:14 0917-173, No13_10_16_1114_16_712 | 1      | -0.87    | 1.090      | 0.010          | 0.067              | 0.657              | 0.0700                   | 0.326              | 1.516              | -1.895          | 0.166              | -0.0060               | 0.0000    | 0.01                      | 0.315     | 21.713              | 0.01      | 0.315        |
| 10/16/2013 11:15 0917-173, No13_10_16_1115_17_512 | 1      | -0.63    | 1.18       | 0.069          | 0.063              | 0.653              | 0.0700                   | 0.593              | 1.506              | -1.648          | 0.168              | -0.0000               | 0.0000    | -0.62                     | 0.321     | 22.765              | -0.62     | 0.321        |
| 10/16/2013 11:16 0917-173, No13_10_16_1116_18_342 | 1      | -0.43    | 0.996      | -0.0600        | 0.065              | 0.657              | 0.0700                   | 0.345              | 1.504              | -1.682          | 0.158              | -0.0060               | 0.0000    | -0.61                     | 0.302     | 21.169              | -0.61     | 0.302        |
| 10/16/2013 11:17 0917-173, No13_10_16_1117_19_052 | 1      | -1.419   | 1.051      | 0.0540         | 0.062              | 0.562              | 0.0690                   | 0.431              | 1.507              | -1.374          | 0.152              | -0.0000               | 0.0000    | -0.65                     | 0.317     | 19.75               | -0.65     | 0.317        |
| 10/16/2013 11:18 0917-173, No13_10_16_1118_20_792 | 1      | -0.958   | 1.065      | -0.0590        | 0.061              | 0.634              | 0.0690                   | 0.447              | 1.499              | -1.644          | 0.162              | -0.0000               | 0.0000    | -0.72                     | 0.308     | 19.512              | -0.72     | 0.308        |
| 10/16/2013 11:19 0917-173, No13_10_16_1119_20_502 | 1      | -2.05    | 1.140      | 0.067          | 0.069              | 0.639              | 0.0690                   | 0.505              | 1.508              | -1.735          | 0.172              | -0.0070               | 0.0000    | -1.20                     | 0.327     | 22.975              | -1.20     | 0.327        |
| 10/16/2013 11:20 0917-173, No13_10_16_1120_21_312 | 1      | -0.70    | 1.015      | -0.1250        | 0.064              | 0.646              | 0.0720                   | 0.334              | 1.502              | -1.66           | 0.165              | -0.0020               | 0.0000    | -0.84                     | 0.296     | 22.419              | -0.84     | 0.296        |
| 10/16/2013 11:21 0917-173, No13_10_16_1121_22_052 | 1      | -1.610   | 1.080      | -0.087         | 0.068              | 0.587              | 0.0710                   | 0.450              | 1.511              | -1.859          | 0.173              | -0.0060               | 0.0000    | -0.56                     | 0.332     | 22.784              | -0.56     | 0.332        |
| 10/16/2013 11:22 0917-173, No13_10_16_1122_23_852 | 1      | 0.24     | 1.078      | 0.018          | 0.067              | 0.649              | 0.0700                   | 0.395              | 1.526              | -1.854          | 0.173              | -0.0000               | 0.0000    | -0.70                     | 0.301     | 21.895              | -0.70     | 0.301        |
| 10/16/2013 11:23 0917-173, No13_10_16_1123_23_562 | 1      | -1.95    | 1.053      | 0.024          | 0.066              | 0.723              | 0.0710                   | 0.388              | 1.517              | -1.774          | 0.170              | -0.0000               | 0.0000    | -0.45                     | 0.317     | 22.242              | -0.45     | 0.317        |
| 10/16/2013 11:24 0917-173, No13_10_16_1124_24_403 | 1      | 0.022    | 1.022      | -0.013         | 0.065              | 0.667              | 0.0690                   | 0.371              | 1.525              | -1.445          | 0.150              | -0.0040               | 0.0000    | -0.36                     | 0.317     | 19.526              | -0.36     | 0.317        |
| 10/16/2013 11:25 0917-173, No13_10_16_1125_25_123 | 1      | -1.617   | 1.009      | -0.071         | 0.069              | 0.631              | 0.0690                   | 0.479              | 1.524              | -1.515          | 0.162              | -0.0000               | 0.0000    | -0.30                     | 0.321     | 21.779              | -0.30     | 0.321        |
| 10/16/2013 11:26 0917-173, No13_10_16_1126_26_883 | 1      | -1.507   | 1.057      | -0.0390        | 0.069              | 0.611              | 0.0650                   | 0.429              | 1.517              | -1.816          | 0.180              | -0.0000               | 0.0000    | -0.38                     | 0.322     | 24.799              | -0.38     | 0.322        |
| 10/16/2013 11:27 0917-173, No13_10_16_1127_28_683 | 1      | -0.24    | 1.139      | -0.0630        | 0.073              | 0.613              | 0.0730                   | 0.546              | 1.524              | -2.35           | 0.215              | -0.0070               | 0.0000    | -1.19                     | 0.327     | 30.443              | -1.19     | 0.327        |
| 10/16/2013 11:28 0917-173, No13_10_16_1128_27_423 | 1      | -0.85    | 0.983      | -0.0520        | 0.074              | 0.695              | 0.0700                   | 0.336              | 1.521              | -2.533          | 0.224              | -0.0040               | 0.0000    | -0.76                     | 0.300     | 32.158              | -0.76     | 0.300        |
| 10/16/2013 11:29 0917-173, No13_10_16_1129_28_213 | 1      | -1.97    | 1.050      | -0.071         | 0.070              | 0.636              | 0.0700                   | 0.395              | 1.520              | -1.735          | 0.160              | -0.0000               | 0.0000    | -0.31                     | 0.317     | 24.646              | -0.31     | 0.317        |
| 10/16/2013 11:30 0917-173, No13_10_16_1130_28_963 | 1      | -2.758   | 1.082      | 0.000          | 0.079              | 0.671              | 0.070                    | 0.346              | 1.513              | -2.58           | 0.243              | -0.0020               | 0.0000    | -0.99                     | 0.332     | 34.941              | -0.99     | 0.332        |
| 10/16/2013 11:31 0917-173, No13_10_16_1131_29_793 | 1      | -0.80    | 0.997      | -0.0550        | 0.071              | 0.731              | 0.0700                   | 0.309              | 1.517              | -2.66           | 0.239              | -0.0040               | 0.0000    |                           |           |                     |           |              |

132

| Location                  | Disc.                  | #        | Start/Stop | Instrument     | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                    |           |              |
|---------------------------|------------------------|----------|------------|----------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|--------------------|-----------|--------------|
| Date                      | Method                 | Filename | DF         | Acrolein (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur Hexafluoride (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/16/2013 15:30 0917-173 | No13_10_16_1530_36_551 | 1        | 4.882      | 2.303          | 0.069              | 0.116              | 0.0385                   | 0.1040             | 0.834              | 1.735           | 0.213              | 0.211                 | -0.0090   | -0.0090                   | 0.00      | 0.67               | 0.26      |              |
| 10/16/2013 15:31 0917-173 | No13_10_16_1531_02_751 | 1        | -4.8160    | 2.354          | 0.119              | 0.116              | -0.0850                  | 0.1040             | 0.644              | 1.705           | 0.123              | 0.200                 | -0.0130   | -0.0050                   | 1.13      | 0.657              | 0.246     |              |
| 10/16/2013 15:31 0917-173 | No13_10_16_1531_08_851 | 1        | 0.871      | 2.450          | -0.0400            | 0.132              | -0.0200                  | 0.1040             | 0.590              | 1.680           | -0.012             | 0.218                 | -0.0090   | 0.0040                    | -0.813    | 0.72               | 0.227     |              |
| 10/16/2013 15:31 0917-173 | No13_10_16_1531_15_041 | 1        | 1.830      | 2.445          | -0.1580            | 0.126              | -0.0510                  | 0.1040             | 0.820              | 1.678           | -0.139             | 0.213                 | 0.0060    | 0.0060                    | -0.598    | 0.72               | 0.266     |              |
| 10/16/2013 15:31 0917-173 | No13_10_16_1531_21_201 | 1        | 3.808      | 2.337          | 0.1450             | 0.127              | -0.071                   | 0.105              | 0.755              | 1.666           | -0.330             | 0.205                 | -0.0050   | 0.0050                    | 1.218     | 0.70               | 0.199     |              |
| 10/16/2013 15:31 0917-173 | No13_10_16_1531_27_441 | 1        | -0.099     | 2.312          | 0.115              | 0.131              | -0.0030                  | 0.101              | 1.022              | 1.693           | -0.233             | 0.212                 | -0.0080   | 0.0050                    | 0.38      | 0.69               | 0.21      |              |
| 10/16/2013 15:31 0917-173 | No13_10_16_1531_33_631 | 1        | 3.1090     | 2.414          | -0.227             | 0.124              | 0.1300                   | 0.0960             | 1.1430             | 1.675           | 0.04               | 0.208                 | -0.0010   | 0.0050                    | -0.50     | 0.72               | 0.199     |              |
| 10/16/2013 15:31 0917-173 | No13_10_16_1531_39_721 | 1        | 4.402      | 2.408          | -0.028             | 0.129              | -0.0250                  | 0.108              | 0.914              | 1.648           | -0.159             | 0.213                 | 0.0120    | 0.0040                    | 0.232     | 0.70               | 0.197     |              |
| 10/16/2013 15:31 0917-173 | No13_10_16_1531_45_921 | 1        | -1.22      | 2.250          | -0.241             | 0.132              | -0.132                   | 0.1000             | 0.494              | 1.622           | -0.281             | 0.209                 | -0.0010   | 0.0050                    | 0.368     | 0.67               | 0.239     |              |
| 10/16/2013 15:31 0917-173 | No13_10_16_1531_52_121 | 1        | 3.528      | 2.437          | 0.094              | 0.129              | -0.050                   | 0.1020             | 0.681              | 1.637           | -0.127             | 0.216                 | -0.0110   | 0.0050                    | 1.14      | 0.71               | 0.198     |              |
| 10/16/2013 15:31 0917-173 | No13_10_16_1531_58_311 | 1        | 2.691      | 1.971          | -0.110             | 0.123              | 0.123                    | 0.1010             | 0.771              | 1.595           | -0.462             | 0.192                 | 0.0060    | 0.0050                    | -0.06     | 0.64               | 0.208     |              |
| 10/16/2013 15:32 0917-173 | No13_10_16_1532_04_511 | 1        | 7.020      | 2.551          | 0.162              | 0.122              | -0.149                   | 0.105              | 0.8950             | 1.592           | -0.135             | 0.212                 | -0.0080   | 0.0060                    | 0.663     | 0.72               | 0.225     |              |
| 10/16/2013 15:32 0917-173 | No13_10_16_1532_10_611 | 1        | -0.848     | 2.313          | 0.1680             | 0.129              | 0.154                    | 0.0970             | 0.647              | 1.613           | 0.261              | 0.211                 | -0.0170   | 0.0050                    | -1.98     | 0.72               | 0.19      |              |
| 10/16/2013 15:32 0917-173 | No13_10_16_1532_16_801 | 1        | -4.245     | 2.322          | -0.112             | 0.122              | 0.0100                   | 0.1000             | 0.840              | 1.576           | -0.097             | 0.206                 | -0.0110   | 0.0040                    | -0.126    | 0.70               | 0.179     |              |
| 10/16/2013 15:32 0917-173 | No13_10_16_1532_23_091 | 1        | 0.225      | 2.455          | 0.0120             | 0.151              | 0.027                    | 0.0990             | 0.713              | 1.579           | -0.565             | 0.212                 | 0.0010    | 0.0050                    | -0.09     | 0.73               | 0.192     |              |
| 10/16/2013 15:32 0917-173 | No13_10_16_1532_29_201 | 1        | -2.098     | 2.479          | 0.142              | 0.130              | -0.172                   | 0.1010             | 0.840              | 1.600           | -0.211             | 0.220                 | -0.0050   | 0.0050                    | 0.952     | 0.72               | 0.193     |              |
| 10/16/2013 15:32 0917-173 | No13_10_16_1532_35_501 | 1        | -0.033     | 2.247          | 0.070              | 0.129              | -0.179                   | 0.097              | 1.002              | 1.557           | -0.413             | 0.208                 | -0.0010   | 0.0050                    | 0.928     | 0.67               | 0.184     |              |
| 10/16/2013 15:32 0917-173 | No13_10_16_1532_41_501 | 1        | 2.233      | 2.460          | -0.0910            | 0.117              | -0.142                   | 0.1000             | 0.296              | 1.569           | 0.000              | 0.204                 | -0.0130   | 0.0040                    | 0.72      | 0.69               | 0.191     |              |
| 10/16/2013 15:32 0917-173 | No13_10_16_1532_47_691 | 1        | 0.5790     | 2.453          | 0.0780             | 0.124              | 0.221                    | 0.0950             | 0.895              | 1.524           | -0.393             | 0.209                 | -0.0080   | 0.0050                    | 0.53      | 0.69               | 0.209     |              |
| 10/16/2013 15:32 0917-173 | No13_10_16_1532_53_981 | 1        | -3.453     | 2.579          | 0.1410             | 0.123              | 0.1490                   | 0.1010             | 0.799              | 1.583           | -0.130             | 0.212                 | 0.0040    | 0.0050                    | 0.13      | 0.74               | 0.218     |              |
| 10/16/2013 15:33 0917-173 | No13_10_16_1533_00_181 | 1        | 1.934      | 2.493          | 0.001              | 0.130              | 0.219                    | 0.0930             | 0.680              | 1.539           | -0.031             | 0.213                 | 0.0000    | 0.0050                    | 0.371     | 0.72               | 0.212     |              |
| 10/16/2013 15:33 0917-173 | No13_10_16_1533_06_381 | 1        | 7.04       | 2.138          | -0.359             | 0.129              | 0.280                    | 0.0910             | 0.910              | 1.547           | -0.174             | 0.207                 | -0.0080   | 0.0050                    | 1.38      | 0.65               | 0.164     |              |
| 10/16/2013 15:33 0917-173 | No13_10_16_1533_12_481 | 1        | 4.25       | 2.178          | 0.208              | 0.131              | 0.229                    | 0.0980             | 0.737              | 1.531           | -0.088             | 0.210                 | 0.0080    | 0.0050                    | 1.51      | 0.69               | 0.223     |              |
| 10/16/2013 15:33 0917-173 | No13_10_16_1533_18_681 | 1        | -4.395     | 2.254          | 0.15               | 0.128              | 0.211                    | 0.0990             | 0.735              | 1.520           | -0.026             | 0.209                 | -0.0030   | 0.0050                    | 0.529     | 0.69               | 0.185     |              |
| 10/16/2013 15:33 0917-173 | No13_10_16_1533_24_881 | 1        | -2.403     | 2.414          | 0.355              | 0.128              | -0.0140                  | 0.0940             | 0.545              | 1.584           | -0.274             | 0.211                 | -0.0140   | 0.0050                    | -0.280    | 0.71               | 0.162     |              |
| 10/16/2013 15:33 0917-173 | No13_10_16_1533_30_191 | 1        | -1.950     | 2.785          | -0.4300            | 0.132              | -0.234                   | 0.117              | 0.748              | 1.682           | -0.242             | 0.216                 | -0.0020   | 0.0050                    | -0.765    | 0.72               | 0.212     |              |
| 10/16/2013 15:33 0917-173 | No13_10_16_1533_37_371 | 1        | -6.698     | 2.520          | 0.158              | 0.140              | -0.178                   | 0.121              | 0.21               | 1.440           | -0.188             | 0.229                 | -0.0100   | 0.0060                    | 0.1510    | 0.77               | 0.074     |              |
| 10/16/2013 15:33 0917-173 | No13_10_16_1533_43_371 | 1        | -5.766     | 2.612          | -0.082             | 0.135              | -0.317                   | 0.131              | 0.838              | 1.370           | -0.469             | 0.227                 | 0.000     | 0.0070                    | 0.44      | 0.739              | -0.047    |              |
| 10/16/2013 15:33 0917-173 | No13_10_16_1533_49_561 | 1        | -1.36      | 2.822          | -0.061             | 0.149              | -0.228                   | 0.129              | 1.125              | 1.362           | -0.474             | 0.247                 | -0.0280   | 0.0060                    | -0.06     | 0.83               | -0.078    |              |
| 10/16/2013 15:33 0917-173 | No13_10_16_1534_05_761 | 1        | 1.488      | 2.522          | -0.4020            | 0.159              | -0.031                   | 0.124              | 0.805              | 1.385           | -0.25              | 0.21                  | -0.0210   | 0.0050                    | -1.18     | 0.79               | -0.049    |              |
| 10/16/2013 15:34 0917-173 | No13_10_16_1534_09_961 | 1        | -4.14      | 2.773          | -0.113             | 0.150              | -0.335                   | 0.122              | 1.530              | 1.358           | -0.058             | 0.248                 | -0.0200   | 0.0050                    | -0.646    | 0.84               | -0.034    |              |
| 10/16/2013 15:34 0917-173 | No13_10_16_1534_09_961 | 1        | -1.5670    | 2.782          | 0.139              | 0.154              | -0.2600                  | 0.121              | 1.229              | 1.441           | 0.2870             | 0.249                 | -0.0100   | 0.0070                    | 0.094     | 0.84               | 0.032     |              |
| 10/16/2013 15:34 0917-173 | No13_10_16_1534_14_261 | 1        | -1.997     | 2.785          | -0.110             | 0.130              | -0.290                   | 0.126              | 0.986              | 1.385           | -0.272             | 0.250                 | -0.0140   | 0.0060                    | -0.12     | 0.83               | 0.097     |              |
| 10/16/2013 15:34 0917-173 | No13_10_16_1534_20_441 | 1        | -3.951     | 2.704          | -0.07              | 0.153              | -0.154                   | 0.117              | 0.995              | 1.408           | 0.043              | 0.250                 | -0.0080   | 0.0050                    | -0.14     | 0.81               | 0.059     |              |
| 10/16/2013 15:34 0917-173 | No13_10_16_1534_26_631 | 1        | 4.7750     | 2.659          | 0.0530             | 0.152              | -0.202                   | 0.122              | 0.879              | 1.466           | 0.073              | 0.243                 | -0.0090   | 0.0060                    | -0.897    | 0.82               | 0.047     |              |
| 10/16/2013 15:34 0917-173 | No13_10_16_1534_32_831 | 1        | -0.524     | 2.880          | 0.153              | 0.140              | -0.002                   | 0.128              | 0.328              | 1.456           | -0.121             | 0.240                 | -0.0070   | 0.0060                    | -0.566    | 0.82               | 0.09      |              |
| 10/16/2013 15:34 0917-173 | No13_10_16_1534_38_501 | 1        | -0.197     | 2.725          | -0.408             | 0.153              | -0.0850                  | 0.124              | 0.912              | 1.471           | -0.13              | 0.243                 | -0.012    | 0.0050                    | 1.99      | 0.83               | 0.13      |              |
| 10/16/2013 15:34 0917-173 | No13_10_16_1534_45_121 | 1        | -4.657     | 2.693          | 0.0800             | 0.146              | -0.191                   | 0.123              | 0.919              | 1.514           | 0.14               | 0.243                 | -0.0020   | 0.0060                    | -1.011    | 0.78               | 0.101     |              |
| 10/16/2013 15:34 0917-173 | No13_10_16_1534_51_321 | 1        | -2.080     | 2.606          | -0.32              | 0.147              | -0.118                   | 0.120              | 0.705              | 1.518           | -0.38              | 0.236                 | -0.0250   | 0.0060                    | 0.650     | 0.77               | 0.154     |              |
| 10/16/2013 15:34 0917-173 | No13_10_16_1534_57_611 | 1        | -0.067     | 2.356          | -0.126             | 0.146              | -0.263                   | 0.120              | 0.625              | 1.553           | -0.277             | 0.227                 | -0.0040   | 0.0060                    | -0.01     | 0.75               | 0.175     |              |
| 10/16/2013 15:35 0917-173 | No13_10_16_1535_03_811 | 1        | -1.577     | 2.566          | 0.1150             | 0.139              | -0.018                   | 0.130              | 0.724              | 1.610           | 0.0110             | 0.227                 | 0.0040    | 0.0060                    | 1.11      | 0.76               | 0.188     |              |
| 10/16/2013 15:35 0917-173 | No13_10_16_1535_09_821 | 1        | 0.48       | 2.621          | 0.066              | 0.140              | -0.108                   | 0.128              | 0.643              | 1.607           | -0.22              | 0.231                 | -0.0040   | 0.0050                    | -1.914    | 0.76               | 0.201     |              |
| 10/16/2013 15:35 0917-173 | No13_10_16_1535_16_021 | 1        | -1.86      | 2.572          | 0.0020             | 0.145              | -0.017                   | 0.117              | 0.655              | 1.631           | 0.019              | 0.233                 | -0.0160   | 0.0060                    | -0.82     | 0.77               | 0.212     |              |
| 10/16/2013 15:35 0917-173 | No13_10_16_1535_22_211 | 1        | -1.2160    | 2.603          | 0.003              | 0.158              | -0.260                   | 0.126              | 0.668              | 1.621           | 0.115              | 0.228                 | -0.0150   | 0.0060                    | 0.49      | 0.75               | 0.217     |              |
| 10/16/2013 15:35 0917-173 | No13_10_16_1535_28_421 | 1        | -3.271     | 2.232          | 0.115              | 0.138              | -0.202                   | 0.123              | 0.16               | 1.652           | -0.1030            | 0.218                 | -0.0170   | 0.0060                    | -1.53     | 0.72               | 0.219     |              |
| 10/16/2013 15:35 0917-173 | No13_10_16_1535_34_611 | 1        | -4.770     | 2.339          | -0.52              | 0.140              | -0.0400                  | 0.110              | 0.810              | 1.652           | -0.610             | 0.223                 | -0.0060   | 0.0060                    | 1.02      | 0.75               | 0.262     |              |
| 10/16/2013 15:35 0917-173 | No13_10_16_1535_40_711 | 1        | -1.24      | 2.556          | 0.058              | 0.139              | -0.058                   | 0.123              | 0.190              | 1.702           | -0.218             | 0.226                 | -0.0030   | 0.0060                    | -0.14     | 0.76               | 0.223     |              |
| 10/16/2013 15:35 0917-173 | No13_10_16_1535_46_901 | 1        | -4.9040    | 2.661          | -0.26              | 0.131              | -0.1760                  | 0.115              | 0.835              | 1.662           | -0.563             | 0.225                 | -0.0180   | 0.0060                    | 1.39      | 0.75               | 0.243     |              |
| 10/16/2013 15:35 0917-173 | No13_10_16_1535_53_101 | 1        | -3.35      | 2.813          | 0.193              | 0.152              | -0.0220                  | 0.124              | 0.633              | 1.682           | -0.149             | 0.248                 | 0.0030    | 0.0060                    | -0.226    | 0.82               | 0.237     |              |
| 10/16/2013 15:35 0917-173 | No13_10_16_1535_59_391 | 1        | -0.30      | 2.359          | 0.111              | 0.141              | -0.0340                  | 0.115              | 0.631              | 1.725           | -0.051             | 0.225                 | -0.0100   | 0.0060                    | -0.002    | 0.74               | 0.236     |              |
| 10/16/2013 15:36 0917-173 | No13_10_16_1536_05_191 | 1        | -1.98      | 2.586          | -0.277             | 0.138              | -0.0780                  | 0.127              | 0.19               | 1.674           | -0.180             | 0.238                 | -0.0080   | 0.0060                    | 0.77      | 0.78               | 0.285     |              |
| 10/16/2013 15:36 0917-173 | No13_10_16_1536_11_681 | 1        | 2.350      | 2.490          | -0.002             | 0.127              | -0.0570                  | 0.123              | 0.434              | 1.717           | -0.199             | 0.214                 | -0.0210   | 0.0060                    | -0.04     | 0.73               | 0.211     |              |
| 10/16/2013 15:36 0917-173 | No13_10_16_1536_17_881 | 1        | -1.576     | 2.663          | 0.263              | 0.131              | -0.180                   | 0.126              | 0.705              | 1.675           | 0.300              | 0.220                 | -0.0260   | 0.0050                    | -0.700    | 0.75               | 0.228     |              |
| 10/16/2013 15:36 0917-173 | No13_10_16_1536_24_081 | 1        | -6.5370    | 2.558          | -0.1320            | 0.141              | -0.106                   | 0.118              | 0.588              | 1.723           | -0.344             | 0.229                 | -0.0200   | 0.0050                    | -0.25     | 0.77               | 0.264     |              |
| 10/16/2013 15:36 0917-173 | No13_10_16_1536_30_271 | 1        | 4.347      | 2.518          | 0.243              | 0.127              | 0.047                    | 0.130              | 0.579              | 1.755           | 0.024              | 0.224                 | -0.0240   | 0.0060                    | -0.78     | 0.75               | 0.226     |              |
| 10/16/2013 15:36 0917-173 | No13_10_16_1536_36_471 | 1        | -1.631     | 2.553          | 0.065              | 0.134              | -0.285                   |                    |                    |                 |                    |                       |           |                           |           |                    |           |              |



| Location                  | Disc.  | #                 | Start/Stop | Instrument    | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                     |           |              |
|---------------------------|--------|-------------------|------------|---------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|---------------------|-----------|--------------|
| Date                      | Method | Filename          | DF         | Acrolin (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur_hexafluoride (ppm) | SEC (ppm) | acetalddehyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/14/2013 12:14 0917-173 | Ne13   | 10_14_1224_14_091 | 1          | 0.29          | 0.14               | 0.00               | 0.14                     | 0.00               | 0.441              | 0.130           | 0.00               | 0.441                 | 0.130     | 0.00                      | 0.441     | 0.130               | 0.423     | -1.948       |
| 10/14/2013 12:14 0917-173 | Ne13   | 10_14_1224_12_611 | 1          | -2.7          | 1.5                | 0.132              | 0.084                    | -0.28              | 1.61               | 0.1550          | 0.0880             | -0.0450               | 0.138     | 0.049                     | 0.647     | 1.58                | 0.441     | -2.077       |
| 10/14/2013 12:14 0917-173 | Ne13   | 10_14_1224_51_221 | 1          | 0.6           | 1.5                | 0.124              | 0.084                    | -0.41              | 1.64               | 0.050           | 0.1220             | -0.277                | 0.134     | 0.054                     | 0.644     | -0.28               | 0.449     | -2.071       |
| 10/14/2013 12:15 0917-173 | Ne13   | 10_14_1225_00_721 | 1          | -3.3          | 1.4                | 0.187              | 0.087                    | -0.56              | 1.65               | -0.002          | 0.1121             | -0.217                | 0.138     | 0.065                     | 0.643     | 0.711               | 0.447     | -2.128       |
| 10/14/2013 12:15 0917-173 | Ne13   | 10_14_1225_38_311 | 1          | 0.1           | 1.5                | 0.268              | 0.078                    | -0.46              | 1.65               | 0.117           | 0.1090             | 0.057                 | 0.100     | 0.057                     | 0.663     | 0.202               | 0.451     | -2.128       |
| 10/14/2013 12:15 0917-173 | Ne13   | 10_14_1225_48_821 | 1          | -4.3          | 1.5                | 0.1500             | 0.087                    | -0.46              | 1.66               | 0.01300         | 0.1060             | -0.225                | 0.140     | 0.061                     | 0.664     | 0.401               | 0.445     | -2.13        |
| 10/14/2013 12:16 0917-173 | Ne13   | 10_14_1226_05_251 | 1          | -0.5          | 1.5                | -0.042             | 0.083                    | -0.51              | 1.66               | -0.0000         | 0.1030             | -0.369                | 0.136     | 0.049                     | 0.661     | 1.20                | 0.435     | -2.114       |
| 10/14/2013 12:16 0917-173 | Ne13   | 10_14_1226_20_561 | 1          | -0.5          | 1.5                | -0.0800            | 0.085                    | -0.48              | 1.69               | 0.0500          | 0.1120             | -0.0540               | 0.139     | 0.056                     | 0.662     | 0.045               | 0.457     | -2.117       |
| 10/14/2013 12:16 0917-173 | Ne13   | 10_14_1226_42_401 | 1          | -0.5          | 1.5                | -0.034             | 0.082                    | -0.57              | 1.67               | -0.212          | 0.1100             | 0.062                 | 0.133     | 0.055                     | 0.665     | 0.631               | 0.447     | -2.139       |
| 10/14/2013 12:17 0917-173 | Ne13   | 10_14_1227_01_001 | 1          | -0.5          | 1.5                | 0.2160             | 0.077                    | -0.48              | 1.67               | 0.321           | 0.0990             | -0.153                | 0.129     | 0.057                     | 0.666     | 0.583               | 0.436     | -2.11        |
| 10/14/2013 12:17 0917-173 | Ne13   | 10_14_1227_19_511 | 1          | -1.8          | 1.7                | 0.166              | 0.083                    | -0.51              | 1.66               | -0.0680         | 0.1080             | 0.283                 | 0.140     | 0.061                     | 0.665     | 0.657               | 0.476     | -2.12        |
| 10/14/2013 12:17 0917-173 | Ne13   | 10_14_1227_38_051 | 1          | 1.6           | 1.5                | 0.075              | 0.079                    | 0.38               | 1.29               | 0.169           | 0.1090             | -0.251                | 0.130     | 0.067                     | 0.665     | 1.50                | 0.458     | -2.118       |
| 10/14/2013 12:17 0917-173 | Ne13   | 10_14_1227_56_641 | 1          | 0.9           | 1.5                | 0.168              | 0.086                    | -0.52              | 1.66               | 0.171           | 0.1110             | -0.118                | 0.139     | 0.062                     | 0.668     | 1.46                | 0.452     | -2.14        |
| 10/14/2013 12:18 0917-173 | Ne13   | 10_14_1228_15_151 | 1          | -3.1          | 1.6                | 0.0100             | 0.077                    | -0.55              | 1.67               | -0.0800         | 0.1100             | -0.0670               | 0.131     | 0.064                     | 0.665     | 0.77                | 0.439     | -2.144       |
| 10/14/2013 12:18 0917-173 | Ne13   | 10_14_1228_35_681 | 1          | -1.3          | 1.6                | 0.186              | 0.075                    | -0.57              | 1.66               | 0.0900          | 0.1050             | -0.175                | 0.137     | 0.065                     | 0.665     | 0.906               | 0.432     | -2.132       |
| 10/14/2013 12:18 0917-173 | Ne13   | 10_14_1228_52_291 | 1          | 0.6           | 1.6                | 0.2600             | 0.080                    | -0.77              | 1.68               | 0.093           | 0.1020             | -0.356                | 0.136     | 0.062                     | 0.665     | 0.487               | 0.455     | -2.149       |
| 10/14/2013 12:19 0917-173 | Ne13   | 10_14_1229_10_741 | 1          | 4.5           | 1.4                | -0.0290            | 0.078                    | -0.31              | 1.66               | 0.163           | 0.1200             | -0.138                | 0.129     | 0.060                     | 0.665     | 0.93                | 0.428     | -2.13        |
| 10/14/2013 12:19 0917-173 | Ne13   | 10_14_1229_29_311 | 1          | 1.9           | 1.5                | 0.114              | 0.084                    | -0.50              | 1.66               | 0.0260          | 0.1140             | -0.054                | 0.137     | 0.056                     | 0.667     | 0.5460              | 0.438     | -2.16        |
| 10/14/2013 12:19 0917-173 | Ne13   | 10_14_1229_47_481 | 1          | 0.6           | 1.5                | 0.2080             | 0.079                    | -0.57              | 1.27               | 0.030           | 0.1190             | 0.144                 | 0.132     | 0.058                     | 0.667     | 0.9000              | 0.446     | -2.126       |
| 10/14/2013 12:20 0917-173 | Ne13   | 10_14_1220_06_371 | 1          | 1.3           | 1.5                | 0.061              | 0.082                    | -0.55              | 1.67               | -0.213          | 0.1080             | -0.176                | 0.136     | 0.049                     | 0.665     | 0.644               | 0.460     | -2.181       |
| 10/14/2013 12:20 0917-173 | Ne13   | 10_14_1220_24_991 | 1          | -2.0          | 1.5                | -0.061             | 0.083                    | -0.38              | 1.67               | 0.0280          | 0.1120             | -0.003                | 0.136     | 0.060                     | 0.663     | 0.74                | 0.461     | -2.146       |
| 10/14/2013 12:20 0917-173 | Ne13   | 10_14_1220_42_481 | 1          | -1.3          | 1.6                | 0.035              | 0.079                    | -0.48              | 1.67               | -0.335          | 0.1050             | -0.063                | 0.129     | 0.061                     | 0.666     | 1.00                | 0.434     | -2.169       |
| 10/14/2013 12:21 0917-173 | Ne13   | 10_14_1221_01_501 | 1          | -3.9          | 1.6                | 0.128              | 0.080                    | -0.64              | 1.67               | 0.181           | 0.1210             | -0.153                | 0.137     | 0.064                     | 0.671     | -0.248              | 0.475     | -2.148       |
| 10/14/2013 12:21 0917-173 | Ne13   | 10_14_1221_20_611 | 1          | -3.1          | 1.5                | 0.038              | 0.082                    | -0.49              | 1.67               | 0.0010          | 0.0990             | -0.242                | 0.134     | 0.065                     | 0.664     | 1.807               | 0.436     | -2.153       |
| 10/14/2013 12:21 0917-173 | Ne13   | 10_14_1221_39_101 | 1          | 0.4           | 1.6                | 0.1860             | 0.084                    | -0.44              | 1.67               | 0.139           | 0.0960             | -0.217                | 0.139     | 0.051                     | 0.664     | -0.15               | 0.456     | -2.168       |
| 10/14/2013 12:21 0917-173 | Ne13   | 10_14_1221_57_711 | 1          | -3.7          | 1.6                | 0.042              | 0.080                    | -0.62              | 1.69               | 0.0030          | 0.1020             | -0.062                | 0.136     | 0.062                     | 0.666     | 0.61                | 0.453     | -2.146       |
| 10/14/2013 12:22 0917-173 | Ne13   | 10_14_1222_16_192 | 1          | -2.1          | 1.6                | -0.035             | 0.084                    | -0.40              | 1.66               | -0.0260         | 0.1080             | -0.276                | 0.140     | 0.057                     | 0.669     | -0.09               | 0.469     | -2.186       |
| 10/14/2013 12:22 0917-173 | Ne13   | 10_14_1222_34_662 | 1          | 0.5           | 1.5                | 0.097              | 0.079                    | -0.58              | 1.66               | 0.0240          | 0.0980             | -0.044                | 0.131     | 0.049                     | 0.666     | 0.4520              | 0.445     | -2.17        |
| 10/14/2013 12:22 0917-173 | Ne13   | 10_14_1222_53_282 | 1          | 0.8           | 1.4                | 0.104              | 0.082                    | -0.50              | 1.66               | 0.1230          | 0.1040             | -0.141                | 0.133     | 0.061                     | 0.666     | 0.607               | 0.453     | -2.143       |
| 10/14/2013 12:23 0917-173 | Ne13   | 10_14_1223_11_782 | 1          | -1.9          | 1.4                | 0.2600             | 0.082                    | -0.40              | 1.66               | 0.2600          | 0.102              | -0.072                | 0.130     | 0.062                     | 0.666     | 0.60                | 0.424     | -2.166       |
| 10/14/2013 12:24 0917-173 | Ne13   | 10_14_1244_45_810 | 1          | 1.7           | 1.000              | -0.1880            | 0.163                    | 10.0               | 0.887              | -0.054          | 0.1080             | 1.383                 | 0.215     | 3.42                      | 0.0220    | 0.853               | 0.339     | 0.704        |
| 10/14/2013 12:45 0917-173 | Ne13   | 10_14_1246_46_590 | 1          | -0.09         | 0.958              | -0.128             | 0.170                    | 11.17              | 0.926              | -0.108          | 0.1160             | 1.46                  | 0.223     | 3.44                      | 0.0220    | 0.683               | 0.341     | 0.736        |
| 10/14/2013 12:46 0917-173 | Ne13   | 10_14_1246_47_900 | 1          | 0.57          | 1.049              | -0.128             | 0.170                    | 11.17              | 0.926              | -0.108          | 0.1160             | 1.46                  | 0.223     | 3.44                      | 0.0220    | 0.683               | 0.341     | 0.736        |
| 10/14/2013 12:47 0917-173 | Ne13   | 10_14_1247_48_200 | 1          | 0.66          | 0.928              | -0.0260            | 0.174                    | 11.46              | 0.951              | -0.009          | 0.1130             | 1.46                  | 0.223     | 3.44                      | 0.0220    | 0.469               | 0.342     | 0.739        |
| 10/14/2013 12:48 0917-173 | Ne13   | 10_14_1248_48_990 | 1          | 0.88          | 0.967              | -0.240             | 0.172                    | 115.4              | 0.952              | 0.1230          | 0.1130             | 1.60                  | 0.224     | 3.45                      | 0.0240    | 0.410               | 0.347     | 0.712        |
| 10/14/2013 12:49 0917-173 | Ne13   | 10_14_1249_49_710 | 1          | -0.22         | 0.979              | -0.2450            | 0.1780                   | 116                | 0.952              | 0.1207          | 0.1130             | 1.45                  | 0.229     | 3.45                      | 0.0230    | 0.855               | 0.339     | 0.726        |
| 10/14/2013 12:50 0917-173 | Ne13   | 10_14_1250_49_520 | 1          | 0.07          | 1.13               | 1.00               | 0.164                    | 1.16               | 0.952              | 0.1207          | 0.1130             | 1.45                  | 0.229     | 3.46                      | 0.0230    | 0.358               | 0.352     | 0.752        |
| 10/14/2013 12:51 0917-173 | Ne13   | 10_14_1251_51_320 | 1          | 1.45          | 0.994              | -0.347             | 0.178                    | 117                | 0.975              | 0.059           | 0.1160             | 1.42                  | 0.232     | 3.45                      | 0.0230    | 0.811               | 0.348     | 0.712        |
| 10/14/2013 12:52 0917-173 | Ne13   | 10_14_1252_52_020 | 1          | 0.44          | 0.968              | -0.161             | 0.181                    | 118                | 0.975              | 0.1400          | 0.1150             | 1.47                  | 0.234     | 3.45                      | 0.0230    | 0.521               | 0.340     | 0.742        |
| 10/14/2013 12:53 0917-173 | Ne13   | 10_14_1253_53_871 | 1          | 0.74          | 1.018              | -0.155             | 0.185                    | 118                | 0.977              | -0.006          | 0.1120             | 1.47                  | 0.234     | 3.45                      | 0.0230    | 0.730               | 0.360     | 0.710        |
| 10/14/2013 12:54 0917-173 | Ne13   | 10_14_1254_54_581 | 1          | -0.85         | 1.029              | -0.264             | 0.183                    | 118                | 0.967              | -0.043          | 0.1070             | 1.59                  | 0.242     | 3.45                      | 0.0240    | 0.509               | 0.341     | 0.715        |
| 10/14/2013 12:55 0917-173 | Ne13   | 10_14_1255_55_371 | 1          | 1.49          | 1.043              | -0.259             | 0.183                    | 118                | 0.977              | 0.002           | 0.1090             | 1.51                  | 0.236     | 3.46                      | 0.0230    | 1.422               | 0.344     | 0.719        |
| 10/14/2013 12:56 0917-173 | Ne13   | 10_14_1256_56_131 | 1          | -0.46         | 0.936              | -0.150             | 0.180                    | 118                | 0.980              | 0.014           | 0.1170             | 1.47                  | 0.235     | 3.45                      | 0.0230    | 0.624               | 0.333     | 0.718        |
| 10/14/2013 12:57 0917-173 | Ne13   | 10_14_1257_57_961 | 1          | -0.68         | 0.971              | -0.182             | 0.182                    | 118                | 0.991              | 0.063           | 0.125              | 1.53                  | 0.239     | 3.46                      | 0.0230    | 0.980               | 0.338     | 0.709        |
| 10/14/2013 13:01 0917-173 | Ne13   | 10_14_1301_13_152 | 1          | -1.144        | 1.950              | 4.07               | 0.107                    | 2.57               | 0.305              | 0.165           | 0.213              | -0.403                | 0.179     | 0.00900                   | 0.0170    | 1.00                | 0.567     | 6.843        |
| 10/14/2013 13:04 0917-173 | Ne13   | 10_14_1304_13_372 | 1          | -3.45         | 1.911              | 3.80               | 0.107                    | 2.16               | 0.305              | 0.055           | 0.213              | -0.425                | 0.177     | 0.00900                   | 0.0170    | 0.06                | 0.576     | 6.928        |
| 10/14/2013 13:05 0917-173 | Ne13   | 10_14_1305_14_181 | 1          | -2.86         | 1.866              | 1.80               | 0.106                    | 2.16               | 0.291              | 0.130           | 0.216              | -0.410                | 0.180     | 0.01000                   | 0.0180    | 0.64                | 0.547     | 6.813        |
| 10/14/2013 13:06 0917-173 | Ne13   | 10_14_1306_14_962 | 1          | -1.45         | 1.87               | 6.37               | 0.110                    | 2.30               | 0.293              | 0.0730          | 0.216              | -0.3120               | 0.180     | 0.01000                   | 0.0200    | 0.06                | 0.560     | 6.772        |
| 10/14/2013 13:07 0917-173 | Ne13   | 10_14_1307_15_753 | 1          | -3.53         | 1.92               | 7.75               | 0.113                    | 2.46               | 0.285              | 0.0210          | 0.217              | -0.4060               | 0.182     | 0.01                      | 0.0210    | 0.48                | 0.563     | 6.563        |
| 10/14/2013 13:08 0917-173 | Ne13   | 10_14_1308_16_493 | 1          | -1.81         | 1.93               | 7.97               | 0.114                    | 2.47               | 0.288              | 0.167           | 0.216              | -0.3400               | 0.184     | 0.01                      | 0.0210    | 1.33                | 0.573     | 6.501        |
| 10/14/2013 13:09 0917-173 | Ne13   | 10_14_1309_17_213 | 1          | -4.57         | 2.037              | 4.02               | 0.117                    | 2.62               | 0.287              | 0.136           | 0.216              | -0.3580               | 0.186     | 0.0008                    | 0.0210    | 1.21                | 0.598     | 6.556        |
| 10/14/2013 13:20 0917-173 | Ne13   | 10_14_1320_18_043 | 1          | -2.731        | 1.930              | 3.79               | 0.103                    | 2.13               | 0.305              | 0.101           | 0.216              | -0.554                | 0.175     | 0.00900                   | 0.0170    | 0.32                | 0.572     | 6.734        |
| 10/14/2013 13:21 0917-173 | Ne13   | 10_14_1321_18_863 | 1          | -2.423        | 1.993              | 4.22               | 0.111                    | 2.11               | 0.301              | 0.200           | 0.216              | -0.721                | 0.183     | 0.00800                   | 0.0180    | 0.291               | 0.579     | 6.736        |
| 10/14/2013 13:22 0917-173 | Ne13   | 10_14_1322_19_563 | 1          | -2.855        | 1.899              | 2.57               | 0.107                    | 1.98               | 0.309              | 0.156           | 0.215              | -0.697                | 0.178     | 0.00300                   | 0.0150    | -0.11               | 0.567     | 6.812        |
| 10/14/2013 13:23 0917-173 | Ne13   | 10_14_1323_20_313 | 1          | -2.630        | 1.923              | 0.82               | 0.106                    | 1.92               | 0.305              | 0.125           | 0.214              | -0.9210               | 0.186     | 0.0001                    | 0.0160    | 0.10                | 0.570     | 6.811        |
| 10/14/2013 13:24 0917-173 | Ne13   | 10_14_1324_21_163 | 1          | -4.050        | 1.879              | 0.820              | 0.109                    | 1.79               | 0.340              | 0.110           |                    |                       |           |                           |           |                     |           |              |

| Location                                          | Disc.  | #        | Start/Stop | Instrument     | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spile | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                     |           |              |
|---------------------------------------------------|--------|----------|------------|----------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|---------------------|-----------|--------------|
| Date                                              | Method | Filename | DF         | Acroline (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur Hexafluoride (ppm) | SEC (ppm) | acetalddehyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/14/2013 15:05 0917-173, No13_10_14_1505_29_184 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:26 0917-173, No13_10_14_1526_23_993 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:27 0917-173, No13_10_14_1527_24_793 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:28 0917-173, No13_10_14_1528_25_404 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:29 0917-173, No13_10_14_1529_26_204 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:30 0917-173, No13_10_14_1530_26_944 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:31 0917-173, No13_10_14_1531_27_714 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:32 0917-173, No13_10_14_1532_28_404 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:33 0917-173, No13_10_14_1533_29_184 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:34 0917-173, No13_10_14_1534_29_994 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:35 0917-173, No13_10_14_1535_30_714 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:36 0917-173, No13_10_14_1536_31_404 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:37 0917-173, No13_10_14_1537_32_154 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:38 0917-173, No13_10_14_1538_32_914 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:39 0917-173, No13_10_14_1539_33_524 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:40 0917-173, No13_10_14_1540_34_305 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:41 0917-173, No13_10_14_1541_35_025 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:42 0917-173, No13_10_14_1542_35_845 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:43 0917-173, No13_10_14_1543_36_595 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:44 0917-173, No13_10_14_1544_37_325 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:45 0917-173, No13_10_14_1545_38_135 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:46 0917-173, No13_10_14_1546_38_965 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:47 0917-173, No13_10_14_1547_39_575 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:48 0917-173, No13_10_14_1548_40_315 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:49 0917-173, No13_10_14_1549_41_135 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:50 0917-173, No13_10_14_1550_42_845 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:51 0917-173, No13_10_14_1551_42_616 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:52 0917-173, No13_10_14_1552_43_326 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:53 0917-173, No13_10_14_1553_44_006 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:54 0917-173, No13_10_14_1554_44_886 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:55 0917-173, No13_10_14_1555_45_656 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:56 0917-173, No13_10_14_1556_46_316 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:57 0917-173, No13_10_14_1557_47_116 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:58 0917-173, No13_10_14_1558_47_826 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 15:59 0917-173, No13_10_14_1559_48_586 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:00 0917-173, No13_10_14_1600_49_366 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:01 0917-173, No13_10_14_1601_50_106 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:02 0917-173, No13_10_14_1602_50_926 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:03 0917-173, No13_10_14_1603_51_667 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:04 0917-173, No13_10_14_1604_52_317 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:05 0917-173, No13_10_14_1605_53_187 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:06 0917-173, No13_10_14_1606_53_907 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:07 0917-173, No13_10_14_1607_54_617 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:08 0917-173, No13_10_14_1608_55_417 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:09 0917-173, No13_10_14_1609_56_147 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:10 0917-173, No13_10_14_1610_56_997 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:11 0917-173, No13_10_14_1611_57_677 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:12 0917-173, No13_10_14_1612_58_447 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:13 0917-173, No13_10_14_1613_59_217 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:14 0917-173, No13_10_14_1614_59_927 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:16 0917-173, No13_10_14_1616_60_718 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:17 0917-173, No13_10_14_1617_61_458 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:18 0917-173, No13_10_14_1618_62_278 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:19 0917-173, No13_10_14_1619_63_028 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:20 0917-173, No13_10_14_1620_63_728 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:21 0917-173, No13_10_14_1621_64_478 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:22 0917-173, No13_10_14_1622_65_198 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:23 0917-173, No13_10_14_1623_65_908 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:24 0917-173, No13_10_14_1624_66_688 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:25 0917-173, No13_10_14_1625_67_458 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:26 0917-173, No13_10_14_1626_68_178 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:27 0917-173, No13_10_14_1627_69_098 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:28 0917-173, No13_10_14_1628_69_748 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:29 0917-173, No13_10_14_1629_70_498 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:30 0917-173, No13_10_14_1630_71_218 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:31 0917-173, No13_10_14_1631_71_988 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:32 0917-173, No13_10_14_1632_73_778 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:33 0917-173, No13_10_14_1633_74_598 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:34 0917-173, No13_10_14_1634_75_298 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:35 0917-173, No13_10_14_1635_76_068 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:36 0917-173, No13_10_14_1636_76_868 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:37 0917-173, No13_10_14_1637_77_578 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:38 0917-173, No13_10_14_1638_78_388 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                   | 1         | 1            |
| 10/14/2013 16:39 0917-173, No13_10_14_1639_79_098 | 1      | 1        | 1          | 1              | 1                  |                    |                          |                    |                    |                 |                    |                       |           |                           |           |                     |           |              |

| Location                                          | Disc.  | #        | Start/Stop | Instrument     | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                   |           |              |
|---------------------------------------------------|--------|----------|------------|----------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|-------------------|-----------|--------------|
| Date                                              | Method | Filename | DF         | Acroline (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur_hexafluoride (ppm) | SEC (ppm) | acetate/deh (ppm) | SEC (ppm) | pinene (ppm) |
| 10/14/2013 17:57 0917-173, No13_10_14_1757_25_403 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 17:58 0917-173, No13_10_14_1758_26_092 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 17:59 0917-173, No13_10_14_1759_26_902 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:00 0917-173, No13_10_14_1800_27_032 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:01 0917-173, No13_10_14_1801_28_432 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:02 0917-173, No13_10_14_1802_28_182 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:03 0917-173, No13_10_14_1803_29_932 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:04 0917-173, No13_10_14_1804_30_702 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:05 0917-173, No13_10_14_1805_31_502 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:06 0917-173, No13_10_14_1806_32_222 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:07 0917-173, No13_10_14_1807_33_033 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:08 0917-173, No13_10_14_1808_33_783 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:09 0917-173, No13_10_14_1809_34_493 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:10 0917-173, No13_10_14_1810_35_313 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:11 0917-173, No13_10_14_1811_36_053 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:12 0917-173, No13_10_14_1812_36_803 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:13 0917-173, No13_10_14_1813_37_653 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:14 0917-173, No13_10_14_1814_38_393 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:15 0917-173, No13_10_14_1815_39_133 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:16 0917-173, No13_10_14_1816_39_933 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:17 0917-173, No13_10_14_1817_40_663 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:18 0917-173, No13_10_14_1818_41_463 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:19 0917-173, No13_10_14_1819_42_244 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:20 0917-173, No13_10_14_1820_42_964 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:21 0917-173, No13_10_14_1821_43_794 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:22 0917-173, No13_10_14_1822_44_554 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:23 0917-173, No13_10_14_1823_45_304 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:24 0917-173, No13_10_14_1824_46_064 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:25 0917-173, No13_10_14_1825_46_864 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:26 0917-173, No13_10_14_1826_47_614 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:27 0917-173, No13_10_14_1827_48_244 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:28 0917-173, No13_10_14_1828_49_044 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:29 0917-173, No13_10_14_1829_49_794 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:30 0917-173, No13_10_14_1830_50_525 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:31 0917-173, No13_10_14_1831_51_325 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:32 0917-173, No13_10_14_1832_52_055 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:33 0917-173, No13_10_14_1833_52_805 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:34 0917-173, No13_10_14_1834_53_625 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:35 0917-173, No13_10_14_1835_54_365 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:36 0917-173, No13_10_14_1836_55_185 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:37 0917-173, No13_10_14_1837_55_935 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:38 0917-173, No13_10_14_1838_56_745 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:39 0917-173, No13_10_14_1839_57_545 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:40 0917-173, No13_10_14_1840_58_295 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:41 0917-173, No13_10_14_1841_59_045 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:42 0917-173, No13_10_14_1842_59_866 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:44 0917-173, No13_10_14_1844_60_576 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:45 0917-173, No13_10_14_1845_61_296 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:46 0917-173, No13_10_14_1846_62_146 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:47 0917-173, No13_10_14_1847_62_896 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:48 0917-173, No13_10_14_1848_63_656 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:49 0917-173, No13_10_14_1849_64_376 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:50 0917-173, No13_10_14_1850_65_206 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:51 0917-173, No13_10_14_1851_65_936 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:52 0917-173, No13_10_14_1852_66_736 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:53 0917-173, No13_10_14_1853_66_456 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:54 0917-173, No13_10_14_1854_67_266 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:55 0917-173, No13_10_14_1855_67_997 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:56 0917-173, No13_10_14_1856_68_787 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:57 0917-173, No13_10_14_1857_69_477 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:58 0917-173, No13_10_14_1858_70_317 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 18:59 0917-173, No13_10_14_1859_71_107 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 19:00 0917-173, No13_10_14_1900_71_837 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 19:01 0917-173, No13_10_14_1901_72_537 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 19:02 0917-173, No13_10_14_1902_73_287 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 19:03 0917-173, No13_10_14_1903_74_037 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 19:04 0917-173, No13_10_14_1904_74_787 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 19:05 0917-173, No13_10_14_1905_75_537 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 19:06 0917-173, No13_10_14_1906_76_287 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 19:07 0917-173, No13_10_14_1907_77_037 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 19:08 0917-173, No13_10_14_1908_77_787 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 19:09 0917-173, No13_10_14_1909_78_537 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 19:10 0917-173, No13_10_14_1910_79_287 | 1      | 1        | 1          | 1              | 1                  | 1                  | 1                        | 1                  | 1                  | 1               | 1                  | 1                     | 1         | 1                         | 1         | 1                 | 1         | 1            |
| 10/14/2013 19:11 0917-173, No13_10_14_1911_80_037 | 1      | 1        | 1          | 1              | 1                  |                    |                          |                    |                    |                 |                    |                       |           |                           |           |                   |           |              |



| Location                                          | Disc.  | #        | Start/Stop | Instrument | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                     |           |              |
|---------------------------------------------------|--------|----------|------------|------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|---------------------|-----------|--------------|
| Date                                              | Method | Filename | DF         | Acro (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur_hexafluoride (ppm) | SEC (ppm) | acetalddehyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/15/2013 10:16 0917-173, No13_10_15_1001_26_364 | 1      | 0.136    | 0.046      | 0.046      | 0.046              | 0.046              | 0.046                    | 0.046              | 0.046              | 0.046           | 0.046              | 0.046                 | 0.046     | 0.046                     | 0.046     | 0.046               | 0.046     | 0.046        |
| 10/15/2013 10:17 0917-173, No13_10_15_1017_21_324 | 1      | 0.7110   | 0.901      | 0.03170    | 0.055              | 0.157              | 0.0340                   | 0.0320             | 0.0740             | 0.134           | 0.088              | 0.00600               | 0.00200   | 0.00600                   | 0.00200   | 0.873               | 0.284     | 0.383        |
| 10/15/2013 10:18 0917-173, No13_10_15_1018_24_144 | 1      | 0.999    | 1.062      | 0.0460     | 0.064              | 2.26               | 0.0650                   | 0.299              | 0.111              | 0.462           | 0.031              | 0.00100               | 0.00200   | 0.00100                   | 0.00200   | 0.395               | 0.336     | 3.909        |
| 10/15/2013 10:19 0917-173, No13_10_15_1019_24_844 | 1      | 1.193    | 1.225      | 0.020      | 0.0670             | 0.05               | 0.0910                   | 0.402              | 1.688              | 0.773           | 0.117              | 0.00400               | 0.00300   | 0.00400                   | 0.00300   | 0.720               | 0.351     | 5.806        |
| 10/15/2013 10:20 0917-173, No13_10_15_1020_24_504 | 1      | 1.6790   | 1.063      | 0.009      | 0.068              | 0.11               | 0.0910                   | 0.201              | 1.720              | 0.940           | 0.117              | 0.00700               | 0.00300   | 0.00700                   | 0.00300   | 0.146               | 0.348     | 6.361        |
| 10/15/2013 10:21 0917-173, No13_10_15_1021_25_404 | 1      | -1.4620  | 1.199      | 0.0780     | 0.067              | 3.16               | 0.0890                   | 0.469              | 1.718              | 0.761           | 0.118              | 0.00300               | 0.00300   | 0.00300                   | 0.00300   | 0.51                | 0.362     | 6.674        |
| 10/15/2013 10:22 0917-173, No13_10_15_1022_26_154 | 1      | -1.127   | 1.092      | 0.008      | 0.070              | 3.04               | 0.0880                   | 0.493              | 1.720              | 0.903           | 0.118              | 0.00200               | 0.00300   | 0.00200                   | 0.00300   | 0.56                | 0.342     | 5.824        |
| 10/15/2013 10:23 0917-173, No13_10_15_1023_26_864 | 1      | 1.475    | 1.077      | 0.022      | 0.065              | 2.42               | 0.0900                   | 0.436              | 1.722              | 0.762           | 0.122              | 0.00200               | 0.00300   | 0.00200                   | 0.00300   | 0.44                | 0.332     | 5.944        |
| 10/15/2013 10:24 0917-173, No13_10_15_1024_27_684 | 1      | 0.6640   | 1.166      | 0.195      | 0.065              | 3.10               | 0.0910                   | 0.366              | 1.717              | 0.741           | 0.113              | 0.00200               | 0.00300   | 0.00200                   | 0.00300   | 0.110               | 0.342     | 5.739        |
| 10/15/2013 10:25 0917-173, No13_10_15_1025_28_404 | 1      | 0.031    | 1.154      | 0.102      | 0.071              | 2.97               | 0.0900                   | 0.456              | 1.718              | 0.660           | 0.120              | 0.00800               | 0.00300   | 0.00800                   | 0.00300   | 0.15                | 0.358     | 5.329        |
| 10/15/2013 10:26 0917-173, No13_10_15_1026_29_214 | 1      | 0.624    | 1.221      | -0.047     | 0.064              | 2.79               | 0.0870                   | 0.389              | 1.712              | 0.545           | 0.111              | 0.00400               | 0.00300   | 0.00400                   | 0.00300   | -0.578              | 0.345     | 5.028        |
| 10/15/2013 10:27 0917-173, No13_10_15_1027_30_044 | 1      | 0.156    | 1.079      | 0.067      | 0.064              | 2.67               | 0.0830                   | 0.415              | 1.705              | 0.683           | 0.109              | 0.00300               | 0.00300   | 0.00300                   | 0.00300   | 0.65                | 0.317     | 4.943        |
| 10/15/2013 10:28 0917-173, No13_10_15_1028_30_805 | 1      | -0.0030  | 1.154      | 0.1370     | 0.069              | 2.76               | 0.0860                   | 0.418              | 1.699              | 0.671           | 0.113              | 0.00200               | 0.00300   | 0.00200                   | 0.00300   | -0.277              | 0.367     | 4.988        |
| 10/15/2013 10:29 0917-173, No13_10_15_1029_31_375 | 1      | -0.055   | 1.175      | 0.1420     | 0.068              | 2.84               | 0.0880                   | 0.439              | 1.710              | 0.718           | 0.115              | 0.00700               | 0.00300   | 0.00700                   | 0.00300   | -0.756              | 0.352     | 3.733        |
| 10/15/2013 10:30 0917-173, No13_10_15_1030_32_205 | 1      | -1.157   | 1.150      | 0.123      | 0.073              | 2.95               | 0.0790                   | 0.469              | 1.713              | 0.711           | 0.111              | 0.00400               | 0.00300   | 0.00400                   | 0.00300   | 0.677               | 0.367     | 5.465        |
| 10/15/2013 10:31 0917-173, No13_10_15_1031_33_365 | 1      | -1.519   | 1.084      | 0.125      | 0.067              | 3.03               | 0.0880                   | 0.287              | 1.714              | 0.707           | 0.114              | 0.00300               | 0.00300   | 0.00300                   | 0.00300   | 0.35                | 0.351     | 5.576        |
| 10/15/2013 10:32 0917-173, No13_10_15_1032_33_755 | 1      | 0.092    | 1.087      | 0.0850     | 0.063              | 3.11               | 0.0870                   | 0.352              | 1.715              | 0.704           | 0.111              | 0.00900               | 0.00300   | 0.00900                   | 0.00300   | 0.58                | 0.333     | 5.769        |
| 10/15/2013 10:33 0917-173, No13_10_15_1033_34_495 | 1      | 0.166    | 1.097      | 0.043      | 0.073              | 3.27               | 0.0910                   | 0.467              | 1.730              | 0.669           | 0.122              | 0.00200               | 0.00300   | 0.00200                   | 0.00300   | 0.47                | 0.352     | 6.169        |
| 10/15/2013 10:34 0917-173, No13_10_15_1034_35_205 | 1      | -1.631   | 1.142      | -0.0740    | 0.070              | 3.38               | 0.0920                   | 0.279              | 1.736              | 0.763           | 0.119              | 0.00200               | 0.00300   | 0.00200                   | 0.00300   | 0.08                | 0.350     | 6.449        |
| 10/15/2013 10:35 0917-173, No13_10_15_1035_35_975 | 1      | 0.310    | 1.088      | -0.048     | 0.072              | 3.38               | 0.0910                   | 0.415              | 1.748              | 0.819           | 0.119              | 0.00500               | 0.00300   | 0.00500                   | 0.00300   | 0.22                | 0.340     | 6.27         |
| 10/15/2013 10:36 0917-173, No13_10_15_1036_36_815 | 1      | 0.047    | 1.116      | 0.0590     | 0.065              | 3.40               | 0.0930                   | 0.353              | 1.743              | 0.8580          | 0.114              | 0.00500               | 0.00300   | 0.00500                   | 0.00300   | 0.16                | 0.340     | 6.296        |
| 10/15/2013 10:37 0917-173, No13_10_15_1037_37_575 | 1      | 1.3400   | 1.199      | 0.013      | 0.067              | 3.19               | 0.0900                   | 0.438              | 1.735              | 0.533           | 0.116              | 0.00400               | 0.00300   | 0.00400                   | 0.00300   | 0.80                | 0.356     | 5.643        |
| 10/15/2013 10:38 0917-173, No13_10_15_1038_38_255 | 1      | 0.448    | 1.142      | 0.0380     | 0.068              | 3.19               | 0.0890                   | 0.549              | 1.735              | 0.802           | 0.115              | 0.00500               | 0.00300   | 0.00500                   | 0.00300   | 0.69                | 0.356     | 5.811        |
| 10/15/2013 10:39 0917-173, No13_10_15_1039_39_115 | 1      | -0.8700  | 1.161      | 0.042      | 0.066              | 3.32               | 0.0930                   | 0.524              | 1.739              | 0.864           | 0.119              | 0.00100               | 0.00300   | 0.00100                   | 0.00300   | 0.35                | 0.350     | 6.198        |
| 10/15/2013 10:40 0917-173, No13_10_15_1040_39_786 | 1      | 0.465    | 1.205      | 0.093      | 0.068              | 3.26               | 0.0880                   | 0.421              | 1.741              | 0.796           | 0.119              | 0.00700               | 0.00300   | 0.00700                   | 0.00300   | 0.85                | 0.362     | 1.851        |
| 10/15/2013 10:41 0917-173, No13_10_15_1041_40_576 | 1      | 0.595    | 1.012      | 0.010      | 0.067              | 2.44               | 0.0900                   | 0.475              | 1.723              | 0.702           | 0.119              | 0.00300               | 0.00300   | 0.00300                   | 0.00300   | 0.36                | 0.366     | 5.999        |
| 10/15/2013 10:42 0917-173, No13_10_15_1042_41_326 | 1      | 0.7580   | 1.197      | 0.034      | 0.068              | 2.83               | 0.0840                   | 0.411              | 1.732              | 0.664           | 0.116              | 0.00600               | 0.00300   | 0.00600                   | 0.00300   | 0.51                | 0.353     | 4.424        |
| 10/15/2013 10:43 0917-173, No13_10_15_1043_42_126 | 1      | 0.4420   | 1.081      | 0.080      | 0.070              | 2.76               | 0.0840                   | 0.569              | 1.723              | 0.760           | 0.115              | 0.00200               | 0.00300   | 0.00200                   | 0.00300   | 0.36                | 0.364     | 5.093        |
| 10/15/2013 10:44 0917-173, No13_10_15_1044_42_864 | 1      | 1.251    | 1.088      | 0.620      | 0.066              | 2.60               | 0.0820                   | 0.508              | 1.715              | 0.641           | 0.110              | 0.00400               | 0.00200   | 0.00400                   | 0.00200   | 0.908               | 0.331     | 4.931        |
| 10/15/2013 10:45 0917-173, No13_10_15_1045_43_486 | 1      | -3.106   | 1.096      | 0.106      | 0.068              | 2.68               | 0.0860                   | 0.519              | 1.721              | 0.698           | 0.114              | 0.00300               | 0.00300   | 0.00300                   | 0.00300   | 0.48                | 0.347     | 4.98         |
| 10/15/2013 10:46 0917-173, No13_10_15_1046_44_456 | 1      | -0.137   | 1.063      | 0.062      | 0.069              | 2.64               | 0.0840                   | 0.579              | 1.680              | 0.570           | 0.115              | 0.00400               | 0.00300   | 0.00400                   | 0.00300   | 0.604               | 0.358     | 4.902        |
| 10/15/2013 10:47 0917-173, No13_10_15_1047_45_156 | 1      | 0.481    | 1.135      | 0.01       | 0.066              | 2.51               | 0.0810                   | 0.614              | 1.695              | 0.640           | 0.111              | 0.00600               | 0.00200   | 0.00600                   | 0.00200   | 0.68                | 0.344     | 4.651        |
| 10/15/2013 10:48 0917-173, No13_10_15_1048_46_776 | 1      | 0.717    | 1.117      | -0.012     | 0.067              | 2.40               | 0.0780                   | 0.570              | 1.680              | 0.718           | 0.114              | 0.00200               | 0.00300   | 0.00200                   | 0.00300   | 0.702               | 0.347     | 4.893        |
| 10/15/2013 10:49 0917-173, No13_10_15_1049_46_776 | 1      | -0.020   | 1.069      | 0.050      | 0.063              | 2.29               | 0.0810                   | 0.7700             | 1.691              | 0.669           | 0.109              | 0.00200               | 0.00300   | 0.00200                   | 0.00300   | 0.65                | 0.327     | 5.213        |
| 10/15/2013 10:50 0917-173, No13_10_15_1050_47_546 | 1      | -1.4400  | 1.033      | -0.0200    | 0.063              | 2.34               | 0.0840                   | 0.360              | 1.676              | 0.757           | 0.109              | 0.00700               | 0.00200   | 0.00700                   | 0.00200   | 0.56                | 0.330     | 5.602        |
| 10/15/2013 10:51 0917-173, No13_10_15_1051_48_286 | 1      | -0.376   | 1.091      | 0.088      | 0.069              | 2.36               | 0.0790                   | 0.523              | 1.695              | 0.801           | 0.116              | 0.00500               | 0.00300   | 0.00500                   | 0.00300   | 0.29                | 0.341     | 6.084        |
| 10/15/2013 10:52 0917-173, No13_10_15_1052_49_107 | 1      | 0.358    | 1.143      | 0.065      | 0.067              | 2.30               | 0.0780                   | 0.570              | 1.680              | 0.718           | 0.114              | 0.00300               | 0.00300   | 0.00300                   | 0.00300   | 0.67                | 0.350     | 5.957        |
| 10/15/2013 10:53 0917-173, No13_10_15_1053_49_787 | 1      | 1.177    | 1.088      | -0.23      | 0.065              | 2.08               | 0.0810                   | 0.588              | 1.673              | 0.785           | 0.111              | 0.00700               | 0.00200   | 0.00700                   | 0.00200   | 0.51                | 0.329     | 6.501        |
| 10/15/2013 10:54 0917-173, No13_10_15_1054_50_617 | 1      | -2.184   | 1.122      | -0.025     | 0.067              | 2.37               | 0.0830                   | 0.582              | 1.695              | 0.891           | 0.117              | 0.00300               | 0.00300   | 0.00300                   | 0.00300   | 0.15                | 0.348     | 7.583        |
| 10/15/2013 10:55 0917-173, No13_10_15_1055_50_947 | 1      | 0.881    | 1.237      | -0.0260    | 0.067              | 2.46               | 0.0860                   | 0.533              | 1.704              | 0.725           | 0.116              | 0.00300               | 0.00300   | 0.00300                   | 0.00300   | 0.12                | 0.368     | 8.5          |
| 10/15/2013 10:56 0917-173, No13_10_15_1056_51_117 | 1      | 1.591    | 1.134      | 0.067      | 0.072              | 2.32               | 0.0820                   | 0.520              | 1.713              | 0.875           | 0.121              | 0.00600               | 0.00300   | 0.00600                   | 0.00300   | 0.75                | 0.359     | 7.847        |
| 10/15/2013 10:57 0917-173, No13_10_15_1057_52_947 | 1      | 0.8880   | 1.190      | 0.0470     | 0.070              | 2.28               | 0.0850                   | 0.557              | 1.705              | 0.109           | 0.125              | 0.00500               | 0.00300   | 0.00500                   | 0.00300   | 0.19                | 0.378     | 8.385        |
| 10/15/2013 10:58 0917-173, No13_10_15_1058_53_697 | 1      | -1.611   | 1.179      | 0.0860     | 0.068              | 2.51               | 0.0830                   | 0.508              | 1.714              | 0.107           | 0.123              | 0.00900               | 0.00300   | 0.00900                   | 0.00300   | 0.43                | 0.354     | 8.651        |
| 10/15/2013 10:59 0917-173, No13_10_15_1059_54_417 | 1      | 0.240    | 1.091      | 0.3700     | 0.067              | 2.44               | 0.0920                   | 0.475              | 1.723              | 0.702           | 0.119              | 0.00300               | 0.00300   | 0.00300                   | 0.00300   | 0.44                | 0.355     | 6.861        |
| 10/15/2013 11:00 0917-173, No13_10_15_1100_55_187 | 1      | -0.740   | 1.126      | -0.153     | 0.063              | 2.65               | 0.0860                   | 0.527              | 1.735              | -1.150          | 0.114              | 0.00500               | 0.00300   | 0.00500                   | 0.00300   | 0.27                | 0.343     | 7.994        |
| 10/15/2013 11:01 0917-173, No13_10_15_1101_55_987 | 1      | 0.843    | 1.090      | -0.0210    | 0.0640             | 2.70               | 0.0850                   | 0.592              | 1.733              | 0.952           | 0.115              | 0.00300               | 0.00300   | 0.00300                   | 0.00300   | 0.54                | 0.322     | 7.798        |
| 10/15/2013 11:02 0917-173, No13_10_15_1102_56_740 | 1      | 1.2240   | 1.129      | 0.1210     | 0.063              | 2.69               | 0.0810                   | 0.650              | 1.735              | 0.796           | 0.119              | 0.00300               | 0.00300   | 0.00300                   | 0.00300   | 0.352               | 0.369     | 8.069        |
| 10/15/2013 11:03 0917-173, No13_10_15_1103_57_478 | 1      | -1.250   | 1.123      | 0.053      | 0.070              | 2.85               | 0.0830                   | 0.595              | 1.731              | 0.880           | 0.121              | 0.00200               | 0.00300   | 0.00200                   | 0.00300   | 0.63                | 0.348     | 7.244        |
| 10/15/2013 11:04 0917-173, No13_10_15_1104_58_198 | 1      | 2.745    | 1.132      | -0.050     | 0.070              | 3.00               | 0.0880                   | 0.396              | 1.746              | 0.9470          | 0.123              | 0.00400               | 0.00200   | 0.00400                   | 0.00200   | 0.15                | 0.351     | 7.322        |
| 10/15/2013 11:05 0917-173, No13_10_15_1105_59_018 | 1      | 0.540    | 1.211      | 0.0150     | 0.068              | 2.68               | 0.0860                   | 0.402              | 1.739              | 1.017           | 0.123              | 0.00200               | 0.00300   | 0.00200                   | 0.00300   | 0.36                | 0.361     | 6.759        |
| 10/15/2013 11:06 0917-173, No13_10_15_1106_59_438 | 1      | -0.6100  |            |            |                    |                    |                          |                    |                    |                 |                    |                       |           |                           |           |                     |           |              |



| Location                                           | Disc.  | #        | Start/Stop | Instrument     | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                     |           |              |
|----------------------------------------------------|--------|----------|------------|----------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|---------------------|-----------|--------------|
| Date                                               | Method | Filename | DF         | Acroline (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur_hexafluoride (ppm) | SEC (ppm) | acetalddehyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/15/2013 15:48 0917-173, No13_10_15_1548_58_423  | 1      | 8.80     | 1.11       | 0.01           | 0.01               | 0.01               | 0.01                     | 0.01               | 0.01               | 0.01            | 0.01               | 0.01                  | 0.01      | 0.01                      | 0.01      | 0.01                | 0.01      | 0.01         |
| 10/15/2013 15:49 0917-173, No13_10_15_1549_59_170  | 1      | 1.000    | 1.200      | -0.039         | 0.087              | 1.004              | 0.0780                   | 0.554              | 1.676              | -2.39           | 0.249              | -0.0000               | 0.00300   | -0.0000                   | 0.00300   | -0.61               | 0.371     | 36.616       |
| 10/15/2013 15:50 0917-173, No13_10_15_1550_59_920  | 1      | 3.171    | 1.212      | -0.012         | 0.081              | 1.029              | 0.0780                   | 0.672              | 1.667              | -2.575          | 0.246              | -0.0000               | 0.00300   | -0.0000                   | 0.00300   | -0.22               | 0.365     | 36.296       |
| 10/15/2013 15:52 0917-173, No13_10_15_1552_59_631  | 1      | 2.254    | 1.153      | -0.019         | 0.085              | 0.968              | 0.0790                   | 0.498              | 1.653              | -2.44           | 0.245              | -0.0000               | 0.00300   | -0.0000                   | 0.00300   | -0.73               | 0.369     | 35.071       |
| 10/15/2013 15:53 0917-173, No13_10_15_1553_59_401  | 1      | 3.31     | 1.174      | -0.011         | 0.063              | 0.1060             | 0.0630                   | 0.463              | 1.349              | -0.359          | 0.108              | -0.0000               | 0.00300   | -0.0000                   | 0.00300   | -0.68               | 0.360     | 6.097        |
| 10/15/2013 15:54 0917-173, No13_10_15_1554_59_221  | 1      | 0.771    | 1.099      | 0.032          | 0.061              | -0.0380            | 0.0570                   | 0.470              | 1.259              | -0.1760         | 0.099              | -0.0000               | 0.00300   | -0.0000                   | 0.00300   | 0.527               | 0.332     | 0.938        |
| 10/15/2013 15:55 0917-173, No13_10_15_1555_59_931  | 1      | 4.075    | 1.082      | 0.044          | 0.062              | -0.0150            | 0.0600                   | 0.5990             | 1.294              | -0.002          | 0.101              | -0.0010               | 0.00200   | -0.0010                   | 0.00200   | 0.124               | 0.334     | 0.687        |
| 10/15/2013 15:56 0917-173, No13_10_15_1556_59_701  | 1      | 1.089    | 1.189      | 0.042          | 0.054              | -0.0170            | 0.0590                   | 0.6800             | 1.295              | -0.181          | 0.107              | -0.0050               | 0.00200   | -0.0050                   | 0.00200   | -0.736              | 0.357     | 0.02         |
| 10/15/2013 15:57 0917-173, No13_10_15_1557_59_531  | 1      | 1.600    | 1.129      | 0.047          | 0.0580             | -0.0600            | 0.0590                   | 0.7290             | 1.288              | 0.113           | 0.099              | -0.00700              | 0.00200   | -0.00700                  | 0.00200   | -0.528              | 0.335     | 0.551        |
| 10/15/2013 15:58 0917-173, No13_10_15_1558_59_231  | 1      | 1.985    | 1.173      | -0.002         | 0.063              | 0.0420             | 0.0580                   | 0.6560             | 1.305              | -0.057          | 0.107              | -0.00600              | 0.00200   | -0.00600                  | 0.00200   | -0.427              | 0.351     | 0.524        |
| 10/15/2013 15:59 0917-173, No13_10_15_1559_59_001  | 1      | 2.440    | 1.135      | 0.152          | 0.063              | -0.0230            | 0.0590                   | 0.6220             | 1.302              | -0.118          | 0.105              | -0.00200              | 0.00200   | -0.00200                  | 0.00200   | -0.368              | 0.353     | 0.542        |
| 10/15/2013 16:00 0917-173, No13_10_15_1600_59_721  | 1      | 0.826    | 1.120      | 0.008          | 0.061              | -0.086             | 0.0580                   | 0.538              | 1.320              | -0.065          | 0.101              | -0.00200              | 0.00200   | -0.00200                  | 0.00200   | -0.080              | 0.345     | 0.601        |
| 10/15/2013 16:01 0917-173, No13_10_15_1601_59_521  | 1      | 1.914    | 1.128      | 0.012          | 0.062              | -0.096             | 0.0590                   | 0.5980             | 1.302              | -0.017          | 0.103              | 0.0                   | 0.00300   | 0.0                       | 0.00300   | -0.401              | 0.344     | 0.574        |
| 10/15/2013 16:02 0917-173, No13_10_15_1602_59_231  | 1      | 0.492    | 1.108      | -0.080         | 0.062              | 0.03               | 0.0550                   | 0.6800             | 1.302              | 0.001           | 0.103              | -0.00300              | 0.00300   | -0.00300                  | 0.00300   | -0.74               | 0.338     | 0.52         |
| 10/15/2013 16:03 0917-173, No13_10_15_1603_59_582  | 1      | 3.508    | 1.182      | 0.040          | 0.059              | 0.0600             | 0.059                    | 0.555              | 1.303              | -0.021          | 0.101              | -0.001                | 0.00200   | -0.001                    | 0.00200   | -0.99               | 0.339     | 0.654        |
| 10/15/2013 16:04 0917-173, No13_10_15_1604_59_092  | 1      | 1.4000   | 1.127      | 0.051          | 0.063              | 0.0410             | 0.0570                   | 0.6580             | 1.301              | -0.095          | 0.103              | 0.0                   | 0.00200   | 0.0                       | 0.00200   | -0.069              | 0.345     | 0.376        |
| 10/15/2013 16:05 0917-173, No13_10_15_1605_59_512  | 1      | 3.195    | 1.160      | 0.028          | 0.062              | 0.0020             | 0.0580                   | 0.456              | 1.301              | -0.028          | 0.103              | -0.00200              | 0.00200   | -0.00200                  | 0.00200   | -0.863              | 0.348     | 0.69         |
| 10/15/2013 16:06 0917-173, No13_10_15_1606_59_1362 | 1      | 2.0650   | 1.192      | 0.026          | 0.061              | -0.016             | 0.0600                   | 0.476              | 1.309              | -0.030          | 0.103              | -0.00400              | 0.00200   | -0.00400                  | 0.00200   | -0.208              | 0.359     | 0.87         |
| 10/15/2013 16:07 0917-173, No13_10_15_1607_59_2092 | 1      | 2.166    | 1.119      | 0.084          | 0.062              | -0.052             | 0.0590                   | 0.540              | 1.293              | 0.103           | 0.103              | 0.0                   | 0.00300   | 0.0                       | 0.00300   | -0.031              | 0.346     | 0.369        |
| 10/15/2013 16:08 0917-173, No13_10_15_1608_59_1842 | 1      | 1.925    | 1.169      | 0.044          | 0.062              | -0.053             | 0.0580                   | 0.6720             | 1.302              | -0.006          | 0.104              | -0.00600              | 0.00200   | -0.00600                  | 0.00200   | 0.037               | 0.358     | 0.419        |
| 10/15/2013 16:09 0917-173, No13_10_15_1609_59_1572 | 1      | 1.8750   | 1.223      | 0.069          | 0.064              | -0.052             | 0.0570                   | 0.522              | 1.310              | 0.049           | 0.107              | -0.01                 | 0.00300   | -0.01                     | 0.00300   | -0.151              | 0.363     | 0.451        |
| 10/15/2013 16:10 0917-173, No13_10_15_1610_59_7339 | 1      | 4.115    | 1.033      | 0.170          | 0.061              | -0.0520            | 0.0560                   | 0.7130             | 1.305              | -0.020          | 0.099              | -0.01                 | 0.00200   | -0.01                     | 0.00200   | -0.503              | 0.331     | 0.441        |
| 10/15/2013 16:11 0917-173, No13_10_15_1611_59_082  | 1      | 3.673    | 1.094      | 0.056          | 0.061              | -0.0170            | 0.0570                   | 0.616              | 1.304              | -0.050          | 0.100              | 0.0                   | 0.00200   | 0.0                       | 0.00200   | -0.456              | 0.332     | 0.457        |
| 10/15/2013 16:12 0917-173, No13_10_15_1612_59_872  | 1      | 2.119    | 1.186      | 0.045          | 0.065              | -0.060             | 0.0590                   | 0.7140             | 1.305              | -0.0300         | 0.109              | -0.00300              | 0.00300   | -0.00300                  | 0.00300   | 0.290               | 0.366     | 0.659        |
| 10/15/2013 16:14 0917-173, No13_10_15_1614_59_622  | 1      | 1.8590   | 1.247      | -0.020         | 0.064              | -0.0380            | 0.0580                   | 0.593              | 1.313              | 0.131           | 0.107              | 0.0                   | 0.00200   | 0.0                       | 0.00200   | -0.443              | 0.364     | 0.84         |
| 10/15/2013 16:16 0917-173, No13_10_15_1616_59_744  | 1      | 1.2      | 1.5        | 0.143          | 0.090              | -0.44              | 1.46                     | -0.213             | 0.1020             | 0.074           | 0.143              | 0.056                 | 0.58      | 0.056                     | 0.58      | 0.193               | 0.449     | -1.839       |
| 10/15/2013 16:27 0917-173, No13_10_15_1627_59_3824 | 1      | 1.3      | 1.5        | -0.038         | 0.082              | -0.43              | 1.57                     | 0.073              | 0.1130             | -0.028          | 0.135              | 0.056                 | 0.630     | 0.056                     | 0.630     | -0.76               | 0.454     | -1.959       |
| 10/15/2013 16:27 0917-173, No13_10_15_1627_59_3824 | 1      | -3.2     | 1.5        | 0.0210         | 0.083              | -0.44              | 1.61                     | 0.080              | 0.1100             | -0.036          | 0.135              | 0.057                 | 0.647     | 0.057                     | 0.647     | -0.886              | 0.442     | -2.03        |
| 10/15/2013 16:28 0917-173, No13_10_15_1628_59_384  | 1      | 1.5      | 0.05       | -0.0000        | 0.085              | -0.4400            | 0.100                    | 0.085              | 0.1040             | -0.0000         | 0.134              | 0.085                 | 0.644     | -0.0000                   | 0.134     | -0.444              | -2.388    | -2.007       |
| 10/15/2013 16:28 0917-173, No13_10_15_1628_59_384  | 1      | -2.6     | 1.5        | 0.028          | 0.080              | -0.44              | 1.65                     | -0.02700           | 0.0970             | 0.12600         | 0.134              | 0.062                 | 0.659     | 0.062                     | 0.659     | -0.727              | 0.439     | -2.072       |
| 10/15/2013 16:28 0917-173, No13_10_15_1628_59_384  | 1      | -0.4     | 1.4        | 0.0470         | 0.083              | -0.35              | 1.66                     | 0.283              | 0.1070             | -0.1500         | 0.131              | 0.060                 | 0.656     | 0.060                     | 0.656     | -0.321              | 0.433     | -2.096       |
| 10/15/2013 16:29 0917-173, No13_10_15_1629_59_444  | 1      | 0.8      | 1.5        | 0.038          | 0.080              | -0.47              | 1.66                     | 0.113              | 0.1100             | -0.033          | 0.135              | 0.062                 | 0.658     | 0.062                     | 0.658     | -0.453              | 0.434     | -2.073       |
| 10/15/2013 16:29 0917-173, No13_10_15_1629_59_444  | 1      | -3.8     | 1.4        | -0.031         | 0.080              | -0.47              | 1.66                     | -0.0330            | 0.1170             | -0.170          | 0.129              | 0.062                 | 0.658     | 0.062                     | 0.658     | -0.517              | 0.428     | -2.306       |
| 10/15/2013 16:29 0917-173, No13_10_15_1629_59_444  | 1      | -0.6     | 1.5        | 0.2780         | 0.086              | -0.52              | 1.66                     | 0.0690             | 0.1130             | 0.328           | 0.139              | 0.064                 | 0.655     | 0.064                     | 0.655     | 0.532               | 0.440     | -2.073       |
| 10/15/2013 16:30 0917-173, No13_10_15_1630_59_504  | 1      | -0.4     | 1.6        | 0.19700        | 0.090              | -0.53              | 1.66                     | 0.0870             | 0.0980             | 0.102           | 0.145              | 0.050                 | 0.659     | 0.050                     | 0.659     | -0.89               | 0.473     | -2.085       |
| 10/15/2013 16:30 0917-173, No13_10_15_1630_59_504  | 1      | 1.2      | 1.6        | 0.260          | 0.082              | -0.46              | 1.66                     | 0.082              | 0.1090             | 0.137           | 0.142              | 0.062                 | 0.654     | 0.062                     | 0.654     | -1.19               | 0.422     | -2.076       |
| 10/15/2013 16:30 0917-173, No13_10_15_1630_59_504  | 1      | -1.6     | 1.6        | 0.255          | 0.084              | -0.42              | 1.66                     | -0.001             | 0.1090             | 0.266           | 0.141              | 0.054                 | 0.660     | 0.054                     | 0.660     | -1.08               | 0.474     | -2.301       |
| 10/15/2013 16:31 0917-173, No13_10_15_1631_59_124  | 1      | -1.6     | 1.5        | -0.02200       | 0.083              | -0.55              | 1.66                     | -0.02200           | 0.1090             | 0.204           | 0.137              | 0.054                 | 0.659     | 0.054                     | 0.659     | -0.443              | 0.448     | -2.11        |
| 10/15/2013 16:31 0917-173, No13_10_15_1631_59_2334 | 1      | -3.7     | 1.4        | 0.088          | 0.085              | -0.45              | 1.65                     | 0.088              | 0.1017             | -0.058          | 0.137              | 0.050                 | 0.650     | 0.050                     | 0.650     | -0.450              | 0.459     | -2.082       |
| 10/15/2013 16:31 0917-173, No13_10_15_1631_59_2334 | 1      | 1.6      | 1.4        | 0.012          | 0.087              | 0.54               | 1.66                     | -0.220             | 0.0990             | 0.2500          | 0.138              | 0.044                 | 0.659     | 0.044                     | 0.659     | -0.44               | 0.448     | -2.097       |
| 10/15/2013 16:31 0917-173, No13_10_15_1631_59_744  | 1      | -4.1     | 1.5        | 0.032          | 0.086              | -0.49              | 1.65                     | -0.033             | 0.1050             | -0.174          | 0.140              | 0.051                 | 0.663     | 0.051                     | 0.663     | 0.3120              | 0.456     | -2.085       |
| 10/15/2013 17:05 0917-173, No13_10_15_1705_46_267  | 1      | -0.031   | 1.626      | 0.826          | 0.203              | 4.39               | 0.163                    | -0.280             | 2.21               | -2.56           | 0.74               | -0.0110               | 0.00500   | -0.0110                   | 0.00500   | -4.2                | 0.60      | 106.945      |
| 10/15/2013 17:06 0917-173, No13_10_15_1706_46_267  | 1      | -2.40    | 1.570      | 0.261          | 0.205              | 4.36               | 0.162                    | -0.280             | 2.21               | -2.56           | 0.74               | -0.0110               | 0.00500   | -0.0110                   | 0.00500   | -4.2                | 0.60      | 106.945      |
| 10/15/2013 17:07 0917-173, No13_10_15_1707_47_767  | 1      | -3.58    | 1.550      | 0.960          | 0.201              | 4.28               | 0.165                    | -0.4               | 2.22               | -2.37           | 0.75               | -0.0070               | 0.00500   | -0.0070                   | 0.00500   | -4.1                | 0.61      | 109.7        |
| 10/15/2013 17:08 0917-173, No13_10_15_1708_48_517  | 1      | -3.28    | 1.705      | 0.798          | 0.203              | 4.39               | 0.167                    | -0.216             | 2.22               | -2.49           | 0.76               | -0.0110               | 0.00600   | -0.0110                   | 0.00600   | -4.1                | 0.61      | 111.3        |
| 10/15/2013 17:09 0917-173, No13_10_15_1709_48_367  | 1      | -3.15    | 1.604      | 0.757          | 0.209              | 4.34               | 0.167                    | -0.216             | 2.23               | -2.49           | 0.76               | -0.0096               | 0.00600   | -0.0096                   | 0.00600   | -4.1                | 0.62      | 111.992      |
| 10/15/2013 17:10 0917-173, No13_10_15_1710_50_067  | 1      | -2.49    | 1.559      | 0.973          | 0.215              | 4.41               | 0.170                    | -0.255             | 2.24               | -2.77           | 0.81               | -0.0050               | 0.00600   | -0.0050                   | 0.00600   | -4.2                | 0.62      | 116.813      |
| 10/15/2013 17:11 0917-173, No13_10_15_1711_50_897  | 1      | -2.52    | 1.559      | 0.816          | 0.212              | 4.31               | 0.171                    | -0.351             | 2.22               | -2.74           | 0.81               | -0.0130               | 0.00600   | -0.0130                   | 0.00600   | -4.8                | 0.60      | 117.907      |
| 10/15/2013 17:12 0917-173, No13_10_15_1712_51_607  | 1      | -2.73    | 1.654      | 0.767          | 0.218              | 4.19               | 0.168                    | -0.408             | 2.22               | -2.57           | 0.83               | -0.0100               | 0.00600   | -0.0100                   | 0.00600   | -4.7                | 0.64      | 119.528      |
| 10/15/2013 17:13 0917-173, No13_10_15_1713_51_267  | 1      | -2.88    | 1.618      | 0.758          | 0.217              | 4.15               | 0.178                    | -0.217             | 2.23               | -2.68           | 0.75               | -0.0110               | 0.00600   | -0.0110                   | 0.00600   | -4.5                | 0.63      | 119.785      |
| 10/15/2013 17:14 0917-173, No13_10_15_1714_53_138  | 1      | -1.50    | 1.508      | 0.847          | 0.218              | 3.98               | 0.168                    | -0.454             | 2.21               | -2.10           | 0.82               | -0.0060               | 0.00600   | -0.0060                   | 0.00600   | -5.4                | 0.63      | 119.4        |
| 10/15/2013 17:15 0917-173, No13_10_15_1715_53_758  | 1      | -0.79    | 1.548      | 0.941          | 0.216              | 3.81               | 0.165                    | -0.200             | 2.22               | -1              |                    |                       |           |                           |           |                     |           |              |

| Location                  | Disc.  | #                 | Start/Stop | Instrument     | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                    |           |              |        |
|---------------------------|--------|-------------------|------------|----------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|--------------------|-----------|--------------|--------|
| Date                      | Method | Filename          | DF         | Acroline (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur Hexafluoride (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) | pinene (ppm) |        |
| 10/15/2013 18155 0917-173 | Ne13   | 10_15_1815_29_181 | 1          | -0.73          | 1.552              | 0.870              | 0.235                    | 3.24               | 0.171              | -0.295          | 2.18               | -2.76                 | 0.90      | -0.0080                   | 0.0000    | -6.3               | 0.67      | 129.99       |        |
| 10/15/2013 18156 0917-173 | Ne13   | 10_15_1816_29_907 | 1          | -0.93          | 1.548              | 0.880              | 0.234                    | 3.27               | 0.174              | -0.410          | 2.19               | -2.92                 | 0.91      | -0.0050                   | 0.0000    | -5.8               | 0.65      | 133.371      |        |
| 10/15/2013 18157 0917-173 | Ne13   | 10_15_1817_21_717 | 1          | 0.00           | 1.619              | 0.958              | 0.285                    | 3.23               | 0.173              | -0.232          | 2.20               | -2.82                 | 0.91      | -0.0070                   | 0.0000    | -5.9               | 0.66      | 135.092      |        |
| 10/15/2013 18159 0917-173 | Ne13   | 10_15_1819_23_207 | 1          | -4.26          | 1.623              | 1.100              | 0.240                    | 3.26               | 0.175              | -0.390          | 2.18               | -2.44                 | 0.92      | -0.0110                   | 0.0000    | -5.8               | 0.67      | 135.035      |        |
| 10/15/2013 19000 0917-173 | Ne13   | 10_15_1900_23_947 | 1          | -3.04          | 1.650              | 1.096              | 0.241                    | 3.23               | 0.172              | -0.550          | 2.20               | -2.31                 | 0.92      | -0.0060                   | 0.0000    | -6.1               | 0.65      | 134.632      |        |
| 10/15/2013 19001 0917-173 | Ne13   | 10_15_1901_24_647 | 1          | -3.49          | 1.647              | 1.179              | 0.239                    | 3.34               | 0.174              | -0.413          | 2.20               | -2.38                 | 0.92      | -0.0050                   | 0.0000    | -6.2               | 0.68      | 135.324      |        |
| 10/15/2013 19002 0917-173 | Ne13   | 10_15_1902_25_437 | 1          | -1.75          | 1.615              | 1.091              | 0.235                    | 3.26               | 0.173              | -0.405          | 2.19               | -2.61                 | 0.92      | -0.0080                   | 0.0000    | -5.4               | 0.68      | 136.219      |        |
| 10/15/2013 19003 0917-173 | Ne13   | 10_15_1903_26_167 | 1          | -2.46          | 1.596              | 1.001              | 0.247                    | 3.32               | 0.178              | -0.158          | 2.19               | -2.62                 | 0.93      | -0.0070                   | 0.0000    | -6.4               | 0.67      | 137.442      |        |
| 10/15/2013 19004 0917-173 | Ne13   | 10_15_1904_26_967 | 1          | -2.43          | 1.705              | 0.991              | 0.236                    | 3.34               | 0.180              | -0.524          | 2.18               | -2.72                 | 0.92      | -0.0040                   | 0.0000    | -5.5               | 0.67      | 137.866      |        |
| 10/15/2013 19005 0917-173 | Ne13   | 10_15_1905_27_078 | 1          | -1.24          | 1.539              | 1.077              | 0.242                    | 3.30               | 0.181              | -0.320          | 2.21               | -2.52                 | 0.92      | -0.0020                   | 0.0000    | -6.3               | 0.66      | 136.566      |        |
| 10/15/2013 19006 0917-173 | Ne13   | 10_15_1906_28_368 | 1          | -3.13          | 1.613              | 1.077              | 0.242                    | 3.32               | 0.177              | -0.589          | 2.19               | -2.57                 | 0.92      | -0.0040                   | 0.0000    | -6.3               | 0.68      | 134.590      |        |
| 10/15/2013 19007 0917-173 | Ne13   | 10_15_1907_29_148 | 1          | -1.59          | 1.632              | 1.039              | 0.239                    | 3.32               | 0.178              | -0.339          | 2.20               | -2.34                 | 0.90      | -0.0090                   | 0.0000    | -5.8               | 0.67      | 133.8        |        |
| 10/15/2013 19008 0917-173 | Ne13   | 10_15_1908_29_878 | 1          | -3.18          | 1.673              | 1.030              | 0.232                    | 3.31               | 0.175              | -0.385          | 2.19               | -2.25                 | 0.89      | -0.0070                   | 0.0000    | -6.1               | 0.67      | 131.795      |        |
| 10/15/2013 19009 0917-173 | Ne13   | 10_15_1909_30_628 | 1          | -2.75          | 1.604              | 0.957              | 0.232                    | 3.28               | 0.175              | -0.252          | 2.20               | -1.94                 | 0.87      | -0.0100                   | 0.0000    | -6.1               | 0.66      | 129.294      |        |
| 10/15/2013 19100 0917-173 | Ne13   | 10_15_1910_31_398 | 1          | -0.42          | 1.661              | 0.857              | 0.223                    | 3.24               | 0.171              | -0.256          | 2.20               | -2.01                 | 0.86      | -0.0070                   | 0.0000    | -5.6               | 0.65      | 127.364      |        |
| 10/15/2013 19111 0917-173 | Ne13   | 10_15_1911_32_168 | 1          | -1.80          | 1.577              | 0.949              | 0.222                    | 3.19               | 0.169              | -0.411          | 2.20               | -1.71                 | 0.84      | -0.0050                   | 0.0000    | -5.7               | 0.66      | 125.647      |        |
| 10/15/2013 19112 0917-173 | Ne13   | 10_15_1912_32_878 | 1          | -2.43          | 1.504              | 0.912              | 0.218                    | 3.29               | 0.169              | -0.468          | 2.20               | -1.62                 | 0.83      | -0.0070                   | 0.0000    | -5.5               | 0.61      | 124.995      |        |
| 10/15/2013 19113 0917-173 | Ne13   | 10_15_1913_33_668 | 1          | -2.43          | 1.548              | 0.910              | 0.222                    | 3.02               | 0.168              | -0.265          | 2.20               | -1.76                 | 0.84      | -0.0010                   | 0.0000    | -5.5               | 0.68      | 125.846      |        |
| 10/15/2013 19114 0917-173 | Ne13   | 10_15_1914_34_358 | 1          | 0.09           | 1.641              | 1.055              | 0.224                    | 3.32               | 0.170              | -0.279          | 2.22               | -1.59                 | 0.85      | -0.0080                   | 0.0050    | -5.2               | 0.66      | 126.748      |        |
| 10/15/2013 19115 0917-173 | Ne13   | 10_15_1915_35_158 | 1          | -2.94          | 1.641              | 0.919              | 0.216                    | 3.15               | 0.169              | -0.251          | 2.19               | -1.64                 | 0.83      | -0.0110                   | 0.0000    | -4.9               | 0.66      | 125.861      |        |
| 10/15/2013 19116 0917-173 | Ne13   | 10_15_1916_36_878 | 1          | -0.90          | 1.620              | 1.061              | 0.224                    | 3.15               | 0.170              | -0.267          | 2.20               | -1.35                 | 0.84      | -0.0000                   | 0.0000    | -5.8               | 0.66      | 125.180      |        |
| 10/15/2013 19117 0917-173 | Ne13   | 10_15_1917_36_589 | 1          | -2.70          | 1.665              | 0.970              | 0.215                    | 3.10               | 0.168              | -0.206          | 2.20               | -1.33                 | 0.82      | -0.0050                   | 0.0000    | -5.9               | 0.67      | 123.83       |        |
| 10/15/2013 19118 0917-173 | Ne13   | 10_15_1918_37_339 | 1          | -1.21          | 1.547              | 1.114              | 0.220                    | 3.03               | 0.165              | -0.175          | 2.19               | -1.34                 | 0.82      | -0.0080                   | 0.0000    | -5.8               | 0.65      | 122.558      |        |
| 10/15/2013 19119 0917-173 | Ne13   | 10_15_1919_38_159 | 1          | -1.50          | 1.619              | 0.888              | 0.214                    | 3.03               | 0.162              | -0.455          | 2.19               | -0.91                 | 0.80      | -0.0060                   | 0.0000    | -6.4               | 0.66      | 119.804      |        |
| 10/15/2013 19120 0917-173 | Ne13   | 10_15_1920_38_908 | 1          | -0.92          | 1.615              | 0.915              | 0.212                    | 3.03               | 0.164              | -0.213          | 2.20               | -0.73                 | 0.79      | -0.0050                   | 0.0000    | -5.8               | 0.65      | 120.149      |        |
| 10/15/2013 19121 0917-173 | Ne13   | 10_15_1921_39_409 | 1          | -3.13          | 1.662              | 0.872              | 0.213                    | 2.98               | 0.163              | -0.222          | 2.19               | -1.04                 | 0.80      | -0.0080                   | 0.0000    | -6.2               | 0.64      | 120.66       |        |
| 10/15/2013 19122 0917-173 | Ne13   | 10_15_1922_40_209 | 1          | -3.99          | 1.686              | 0.989              | 0.217                    | 3.00               | 0.164              | -0.209          | 2.19               | -1.16                 | 0.80      | -0.0050                   | 0.0000    | -5.6               | 0.65      | 120.647      |        |
| 10/15/2013 19123 0917-173 | Ne13   | 10_15_1923_41_009 | 1          | -4.19          | 1.576              | 0.918              | 0.212                    | 3.00               | 0.163              | -0.285          | 2.19               | -1.15                 | 0.81      | -0.0050                   | 0.0000    | -5.5               | 0.66      | 120.997      |        |
| 10/15/2013 19124 0917-173 | Ne13   | 10_15_1924_41_719 | 1          | -0.02          | 1.580              | 0.980              | 0.214                    | 2.91               | 0.162              | -0.184          | 2.19               | -1.00                 | 0.80      | -0.0040                   | 0.0000    | -6.1               | 0.64      | 121.666      |        |
| 10/15/2013 19125 0917-173 | Ne13   | 10_15_1925_43_529 | 1          | -4.02          | 1.533              | 0.761              | 0.214                    | 2.86               | 0.165              | -0.280          | 2.19               | -1.17                 | 0.80      | -0.0060                   | 0.0050    | -6.0               | 0.63      | 121.711      |        |
| 10/15/2013 19126 0917-173 | Ne13   | 10_15_1926_44_249 | 1          | -2.83          | 1.628              | 0.911              | 0.215                    | 2.91               | 0.165              | -0.164          | 2.20               | -1.08                 | 0.81      | -0.0020                   | 0.0050    | -6.6               | 0.66      | 120.843      |        |
| 10/15/2013 19127 0917-173 | Ne13   | 10_15_1927_45_349 | 1          | -1.53          | 1.625              | 0.815              | 0.215                    | 2.99               | 0.165              | -0.099          | 2.20               | -1.34                 | 0.79      | -0.0040                   | 0.0000    | -6.1               | 0.62      | 121.112      |        |
| 10/15/2013 19128 0917-173 | Ne13   | 10_15_1928_44_689 | 1          | -2.65          | 1.579              | 0.820              | 0.216                    | 3.06               | 0.166              | -0.244          | 2.19               | -1.68                 | 0.82      | -0.0050                   | 0.0000    | -5.8               | 0.63      | 121.985      |        |
| 10/15/2013 19129 0917-173 | Ne13   | 10_15_1929_45_530 | 1          | -1.02          | 1.583              | 0.694              | 0.220                    | 3.08               | 0.170              | -0.288          | 2.18               | -2.03                 | 0.82      | -0.0060                   | 0.0000    | -5.0               | 0.64      | 122.743      |        |
| 10/15/2013 19130 0917-173 | Ne13   | 10_15_1930_46_270 | 1          | -2.32          | 1.548              | 0.789              | 0.226                    | 3.29               | 0.172              | -0.217          | 2.19               | -2.32                 | 0.84      | -0.0080                   | 0.0000    | -4.8               | 0.64      | 124.623      |        |
| 10/15/2013 19131 0917-173 | Ne13   | 10_15_1931_47_080 | 1          | -1.46          | 1.645              | 0.800              | 0.227                    | 3.38               | 0.176              | -0.272          | 2.20               | -1.82                 | 0.87      | -0.0070                   | 0.0000    | -5.1               | 0.66      | 125.314      |        |
| 10/15/2013 19132 0917-173 | Ne13   | 10_15_1932_47_740 | 1          | -0.94          | 1.605              | 0.774              | 0.232                    | 3.46               | 0.178              | -0.32           | 2.19               | -2.42                 | 0.85      | -0.0100                   | 0.0000    | -5.3               | 0.61      | 126.03       |        |
| 10/15/2013 19133 0917-173 | Ne13   | 10_15_1933_48_540 | 1          | -2.02          | 1.651              | 0.720              | 0.226                    | 3.51               | 0.182              | -0.21           | 2.20               | -2.62                 | 0.85      | -0.0070                   | 0.0000    | -5.0               | 0.64      | 126.95       |        |
| 10/15/2013 19134 0917-173 | Ne13   | 10_15_1934_48_250 | 1          | -0.54          | 1.670              | 0.822              | 0.225                    | 3.55               | 0.183              | -0.22           | 2.20               | -2.62                 | 0.83      | -0.0050                   | 0.0000    | -4.9               | 0.64      | 124.497      |        |
| 10/15/2013 19135 0917-173 | Ne13   | 10_15_1935_50_070 | 1          | -2.24          | 1.645              | 0.690              | 0.222                    | 3.42               | 0.179              | -0.550          | 2.20               | -2.48                 | 0.83      | -0.0070                   | 0.0000    | -4.8               | 0.64      | 122.553      |        |
| 10/15/2013 19136 0917-173 | Ne13   | 10_15_1936_50_850 | 1          | -1.70          | 1.580              | 0.843              | 0.215                    | 3.39               | 0.172              | -0.31           | 2.20               | -2.08                 | 0.81      | -0.0100                   | 0.0050    | -4.8               | 0.62      | 119.84       |        |
| 10/15/2013 19137 0917-173 | Ne13   | 10_15_1937_51_560 | 1          | -1.13          | 1.532              | 0.714              | 0.208                    | 3.38               | 0.175              | -0.302          | 2.20               | -2.27                 | 0.79      | -0.0040                   | 0.0050    | -4.0               | 0.61      | 117.733      |        |
| 10/15/2013 19138 0917-173 | Ne13   | 10_15_1938_52_260 | 1          | -0.92          | 1.581              | 0.826              | 0.206                    | 3.28               | 0.166              | -0.242          | 2.19               | -2.14                 | 0.79      | -0.0100                   | 0.0050    | -4.3               | 0.61      | 116.433      |        |
| 10/15/2013 19139 0917-173 | Ne13   | 10_15_1939_53_120 | 1          | -0.32          | 1.678              | 0.775              | 0.203                    | 3.21               | 0.165              | -0.081          | 2.21               | -1.89                 | 0.76      | -0.0050                   | 0.0000    | -4.6               | 0.62      | 114.317      |        |
| 10/15/2013 19140 0917-173 | Ne13   | 10_15_1940_53_831 | 1          | -1.88          | 1.519              | 0.839              | 0.204                    | 3.21               | 0.162              | -0.023          | 2.19               | -1.76                 | 0.75      | -0.0090                   | 0.0050    | -4.8               | 0.58      | 112.735      |        |
| 10/15/2013 19141 0917-173 | Ne13   | 10_15_1941_54_551 | 1          | -1.33          | 1.613              | 0.912              | 0.213                    | 3.18               | 0.162              | -0.187          | 2.20               | -1.71                 | 0.75      | -0.0110                   | 0.0050    | -4.7               | 0.60      | 111.551      |        |
| 10/15/2013 19142 0917-173 | Ne13   | 10_15_1942_55_311 | 1          | -0.87          | 1.715              | 0.836              | 0.208                    | 3.13               | 0.161              | -0.111          | 2.21               | -1.80                 | 0.74      | -0.0070                   | 0.0000    | -4.4               | 0.63      | 110.254      |        |
| 10/15/2013 19143 0917-173 | Ne13   | 10_15_1943_56_131 | 1          | 0.41           | 1.646              | 0.788              | 0.196                    | 3.16               | 0.165              | -0.124          | 2.21               | -1.88                 | 0.74      | -0.0120                   | 0.0050    | -4.5               | 0.61      | 110.806      |        |
| 10/15/2013 19144 0917-173 | Ne13   | 10_15_1944_56_911 | 1          | 0.00           | 1.631              | 0.847              | 0.202                    | 3.14               | 0.161              | 0.023           | 2.19               | -1.71                 | 0.74      | -0.0040                   | 0.0050    | -5.1               | 0.58      | 110.291      |        |
| 10/15/2013 19145 0917-173 | Ne13   | 10_15_1945_57_631 | 1          | -1.25          | 1.655              | 0.870              | 0.195                    | 3.07               | 0.160              | -0.169          | 2.20               | -1.73                 | 0.73      | -0.0050                   | 0.0050    | -4.7               | 0.60      | 108.9        |        |
| 10/15/2013 19146 0917-173 | Ne13   | 10_15_1946_58_371 | 1          | -0.83          | 1.630              | 0.860              | 0.198                    | 2.95               | 0.158              | -0.044          | 2.19               | -1.54                 | 0.72      | -0.0100                   | 0.0050    | -3.9               | 0.60      | 108.422      |        |
| 10/15/2013 19147 0917-173 | Ne13   | 10_15_1947_59_161 | 1          | 0.88           | 1.639              | 0.890              | 0.191                    | 2.99               | 0.156              | -0.046          | 2.19               | -1.38                 | 0.72      | -0.0100                   | 0.0050    | -4.7               | 0.59      | 108.048      |        |
| 10/15/2013 19148 0917-173 | Ne13   | 10_15_1948_59_901 | 1          | -3.40          | 1.245              | 1.053              | 0.258                    | 0.848              | 0.080              | -0.226          | 1.345              | -0.11                 | 0.55      | -0.0090                   | 0.0030    | -3.70              | 0.80      | 57.557       |        |
| 10/15/2013 19149 0917-173 | Ne13   | 10_15_1949_60_214 | 1          | -3.72          | 1.214              | 1.077              | 0.253                    | 0.877              | 0.122              | -0.100          | 0.247              | 0.53                  | -0.12     | 0.17                      | -0.0180   | 0.0020             | -3.92     | 0.95         | 38.252 |
| 10/15/2013 19150 0917-173 | Ne13   | 10_15_1950_61_461 | 1          | -2.12          | 1.414              | 2.025              | 0.314                    | -0.122             | 0.0950             | -0.270          | 0.002              | -13.29                | 0.54      | -0.130                    | 0.0000    | -3.49              | 1.06      | 37.928       |        |
| 10/15/2013 19151 0917-173 | Ne13   | 10_15_1951_61_461 | 1          | -5.29          | 1.377              | -2.030             | 0.313                    | -0.2230            | 0.0950             | -0.480          | 0.002              | -13.23                | 0.53      | -0.0900                   |           |                    |           |              |        |





| Location                  | Disc.  | #        | Start/Stop | Instrument     | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spile | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                    |           |                      |
|---------------------------|--------|----------|------------|----------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|--------------------|-----------|----------------------|
| Date                      | Method | Filename | DF         | Acroelin (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur_hexafluoride (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) | pinene (ppm)         |
| 10/16/2013 8:15 0917-173  | 1      | 1        | 0.01       | 0.01           | 0.01               | 0.01               | 0.01                     | 0.01               | 0.01               | 0.01            | 0.01               | 0.01                  | 0.01      | 0.01                      | 0.01      | 0.01               | 0.01      | 0.01                 |
| 10/16/2013 8:36 0917-173  | 1      | 1        | -2.2       | 1.5            | 0.0680             | 0.085              | -0.53                    | 1.64               | 0.0030             | 0.0960          | -0.320             | 0.136                 | 0.069     | 0.628                     | 0.069     | 0.628              | 0.136     | 0.449 -2.027         |
| 10/16/2013 8:36 0917-173  | 1      | 1        | -0.6       | 1.3            | -0.088             | 0.096              | -0.49                    | 1.65               | 0.057              | 0.0910          | -0.2190            | 0.139                 | 0.066     | 0.658                     | 0.066     | 0.658              | 0.139     | 0.537 -0.442 -2.069  |
| 10/16/2013 8:36 0917-173  | 1      | 1        | 0.8        | 1.4            | 0.177              | 0.082              | -0.55                    | 1.65               | -0.0900            | 0.0960          | 0.0720             | 0.131                 | 0.059     | 0.661                     | 0.059     | 0.661              | 0.131     | -0.8010 0.444 -2.023 |
| 10/16/2013 8:37 0917-173  | 1      | 1        | 1.7        | 1.5            | 0.0950             | 0.079              | 0.66                     | 1.65               | 0.156              | 0.1060          | 0.238              | 0.132                 | 0.070     | 0.657                     | 0.070     | 0.657              | 0.132     | 0.430 -2.069         |
| 10/16/2013 8:37 0917-173  | 1      | 1        | 2.1        | 1.4            | -0.0750            | 0.075              | -0.55                    | 1.66               | -0.0060            | 0.1060          | -0.234             | 0.122                 | 0.064     | 0.662                     | 0.064     | 0.662              | 0.122     | 0.3200 0.411 -2.042  |
| 10/16/2013 8:37 0917-173  | 1      | 1        | -0.6       | 1.5            | -0.001             | 0.088              | -0.62                    | 1.65               | -0.0740            | 0.0950          | -0.0830            | 0.141                 | 0.073     | 0.665                     | 0.073     | 0.665              | 0.141     | 0.87 0.476 -2.043    |
| 10/16/2013 8:38 0917-173  | 1      | 1        | -0.6       | 1.5            | -0.1500            | 0.083              | -0.66                    | 1.65               | 0.0650             | 0.0950          | 0.075              | 0.138                 | 0.075     | 0.658                     | 0.075     | 0.658              | 0.138     | 0.472 -2.05          |
| 10/16/2013 8:38 0917-173  | 1      | 1        | -2.4       | 1.5            | -0.122             | 0.088              | -0.50                    | 1.65               | 0.1360             | 0.0990          | -0.142             | 0.141                 | 0.070     | 0.659                     | 0.070     | 0.659              | 0.141     | 0.047 -0.459 -2.045  |
| 10/16/2013 8:38 0917-173  | 1      | 1        | -0.1       | 1.7            | -0.0710            | 0.076              | -0.61                    | 1.66               | -0.1360            | 0.1060          | 0.263              | 0.133                 | 0.074     | 0.664                     | 0.074     | 0.664              | 0.133     | -1.206 0.456 -2.043  |
| 10/16/2013 8:39 0917-173  | 1      | 1        | 2.2        | 1.4            | -0.011             | 0.079              | -0.46                    | 1.66               | 0.0660             | 0.1010          | 0.000              | 0.129                 | 0.071     | 0.661                     | 0.071     | 0.661              | 0.129     | -0.010 0.428 -2.059  |
| 10/16/2013 8:39 0917-173  | 1      | 1        | 1.5        | 0.4            | 0.035              | 0.084              | 0.21                     | 1.66               | 0.121              | 0.1040          | 0.015              | 0.127                 | 0.064     | 0.663                     | 0.064     | 0.663              | 0.127     | 0.464 0.443 -2.016   |
| 10/16/2013 8:39 0917-173  | 1      | 1        | -2.4       | 1.5            | -0.020             | 0.082              | -0.49                    | 1.65               | -0.142             | 0.1010          | 0.067              | 0.134                 | 0.064     | 0.664                     | 0.064     | 0.664              | 0.134     | 0.289 0.433 -2.005   |
| 10/16/2013 8:40 0917-173  | 1      | 1        | 0.5        | 1.6            | 0.061              | 0.081              | -0.49                    | 1.65               | -0.1410            | 0.1010          | -0.1700            | 0.136                 | 0.061     | 0.665                     | 0.061     | 0.665              | 0.136     | 0.490 0.466 -2.007   |
| 10/16/2013 10:53 0917-173 | 1      | 1        | 0.5        | 1.6            | 0.061              | 0.081              | -0.49                    | 1.65               | -0.1410            | 0.1010          | -0.1700            | 0.136                 | 0.061     | 0.665                     | 0.061     | 0.665              | 0.136     | 0.490 0.466 -2.007   |
| 10/16/2013 10:54 0917-173 | 1      | 1        | -0.09      | 1.253          | 0.080              | 0.067              | 0.554                    | 0.0760             | 0.326              | 1.743           | -1.130             | 0.444                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | 1.13      | 0.368 15.707         |
| 10/16/2013 10:55 0917-173 | 1      | 1        | 1.12       | 1.212          | -0.085             | 0.079              | 0.647                    | 0.0790             | 0.394              | 1.744           | -1.582             | 0.178                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | 0.77      | 0.381 21.29          |
| 10/16/2013 10:56 0917-173 | 1      | 1        | -2.953     | 1.244          | -0.042             | 0.078              | 0.724                    | 0.0840             | 0.564              | 1.758           | -1.808             | 0.188                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | 0.73      | 0.379 23.836         |
| 10/16/2013 10:57 0917-173 | 1      | 1        | -0.24      | 1.219          | 0.184              | 0.077              | 0.759                    | 0.0800             | 0.536              | 1.758           | -1.797             | 0.191                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | 0.98      | 0.352 24.445         |
| 10/16/2013 10:58 0917-173 | 1      | 1        | -2.570     | 1.235          | -0.138             | 0.085              | 0.816                    | 0.0810             | 0.552              | 1.759           | -2.046             | 0.203                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | -1.12     | 0.389 26.209         |
| 10/16/2013 10:59 0917-173 | 1      | 1        | -2.95      | 1.207          | -0.0360            | 0.079              | 0.815                    | 0.0810             | 0.538              | 1.757           | -1.73              | 0.194                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | -1.32     | 0.363 23.742         |
| 10/16/2013 11:00 0917-173 | 1      | 1        | -0.45      | 1.270          | 0.010              | 0.080              | 0.752                    | 0.080              | 0.540              | 1.719           | -1.524             | 0.188                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | 0.71      | 0.387 24.884         |
| 10/16/2013 11:01 0917-173 | 1      | 1        | -0.85      | 1.259          | -0.044             | 0.076              | 0.878                    | 0.0810             | 0.361              | 1.732           | -1.923             | 0.191                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | -1.07     | 0.376 25.129         |
| 10/16/2013 11:02 0917-173 | 1      | 1        | -0.82      | 1.322          | -0.1160            | 0.081              | 0.877                    | 0.0800             | 0.558              | 1.729           | -2.02              | 0.201                 | -0.0010   | 0.0000                    | -0.0010   | 0.0000             | -1.39     | 0.389 26.538         |
| 10/16/2013 11:03 0917-173 | 1      | 1        | -1.50      | 1.182          | 0.059              | 0.076              | 0.823                    | 0.0770             | 0.502              | 1.736           | -1.958             | 0.192                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | 0.98      | 0.366 25.516         |
| 10/16/2013 11:04 0917-173 | 1      | 1        | -0.72      | 1.172          | 0.078              | 0.080              | 0.720                    | 0.080              | 0.540              | 1.719           | -1.524             | 0.188                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | 0.71      | 0.387 24.884         |
| 10/16/2013 11:05 0917-173 | 1      | 1        | -1.86      | 1.256          | 0.0060             | 0.077              | 0.832                    | 0.0770             | 0.459              | 1.718           | -1.998             | 0.194                 | -0.0010   | 0.0000                    | -0.0010   | 0.0000             | -0.83     | 0.379 26.146         |
| 10/16/2013 11:06 0917-173 | 1      | 1        | -0.894     | 1.240          | 0.106              | 0.077              | 0.822                    | 0.0780             | 0.627              | 1.713           | -2.199             | 0.202                 | 0.00      | 0.0000                    | 0.00      | 0.0000             | 0.11      | 0.386 27.025         |
| 10/16/2013 11:07 0917-173 | 1      | 1        | -1.919     | 1.295          | 0.010              | 0.081              | 0.737                    | 0.0780             | 0.536              | 1.718           | -2.072             | 0.199                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | -0.24     | 0.392 26.125         |
| 10/16/2013 11:08 0917-173 | 1      | 1        | -1.846     | 1.249          | 0.066              | 0.073              | 0.836                    | 0.073              | 0.486              | 1.719           | -1.848             | 0.203                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | 0.73      | 0.351 26.106         |
| 10/16/2013 11:09 0917-173 | 1      | 1        | -0.490     | 1.145          | -0.0680            | 0.079              | 0.767                    | 0.0810             | 0.502              | 1.727           | -1.818             | 0.182                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | -0.68     | 0.374 23.557         |
| 10/16/2013 11:10 0917-173 | 1      | 1        | -0.47      | 1.263          | -0.065             | 0.079              | 0.776                    | 0.0790             | 0.441              | 1.747           | -1.65              | 0.186                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | -1.43     | 0.382 24.175         |
| 10/16/2013 11:11 0917-173 | 1      | 1        | -1.15      | 1.295          | -0.085             | 0.081              | 0.815                    | 0.0810             | 0.536              | 1.760           | -2.176             | 0.206                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | -1.20     | 0.385 24.107         |
| 10/16/2013 11:12 0917-173 | 1      | 1        | 0.01       | 1.162          | 0.090              | 0.080              | 0.761                    | 0.0820             | 0.479              | 1.773           | -1.760             | 0.188                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | 0.59      | 0.353 25.069         |
| 10/16/2013 11:13 0917-173 | 1      | 1        | 1.54       | 1.255          | -0.0800            | 0.080              | 0.814                    | 0.0830             | 0.509              | 1.777           | -1.955             | 0.197                 | -0.0010   | 0.0000                    | -0.0010   | 0.0000             | -1.11     | 0.385 26.142         |
| 10/16/2013 11:14 0917-173 | 1      | 1        | -1.03      | 1.292          | 0.011              | 0.079              | 0.779                    | 0.0800             | 0.387              | 1.777           | -2.247             | 0.197                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | 0.01      | 0.374 25.74          |
| 10/16/2013 11:15 0917-173 | 1      | 1        | -0.75      | 1.314          | 0.081              | 0.081              | 0.735                    | 0.0830             | 0.578              | 1.785           | -1.950             | 0.198                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | 0.71      | 0.380 27.012         |
| 10/16/2013 11:16 0917-173 | 1      | 1        | 1.69       | 1.181          | -0.0710            | 0.076              | 0.779                    | 0.0830             | 0.409              | 1.783           | -1.994             | 0.187                 | -0.0070   | 0.0000                    | -0.0070   | 0.0000             | -0.73     | 0.358 25.096         |
| 10/16/2013 11:17 0917-173 | 1      | 1        | -0.486     | 1.246          | 0.0640             | 0.074              | 0.666                    | 0.0810             | 0.511              | 1.788           | -1.629             | 0.180                 | -0.0070   | 0.0000                    | -0.0070   | 0.0000             | -0.78     | 0.376 23.413         |
| 10/16/2013 11:18 0917-173 | 1      | 1        | -1.135     | 1.144          | -0.0510            | 0.081              | 0.752                    | 0.0810             | 0.530              | 1.812           | -2.042             | 0.188                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | -0.49     | 0.365 23.019         |
| 10/16/2013 11:19 0917-173 | 1      | 1        | -2.43      | 1.351          | 0.079              | 0.082              | 0.757                    | 0.0820             | 0.599              | 1.788           | -2.057             | 0.204                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | -1.43     | 0.399 27.237         |
| 10/16/2013 11:20 0917-173 | 1      | 1        | -0.83      | 1.204          | -0.1490            | 0.075              | 0.765                    | 0.0850             | 0.396              | 1.780           | -1.57              | 0.196                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | -1.00     | 0.351 26.578         |
| 10/16/2013 11:21 0917-173 | 1      | 1        | -1.908     | 1.280          | -0.103             | 0.080              | 0.695                    | 0.0840             | 0.534              | 1.791           | -2.204             | 0.205                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | -0.69     | 0.393 27.01          |
| 10/16/2013 11:22 0917-173 | 1      | 1        | -0.59      | 1.282          | 0.079              | 0.080              | 0.720                    | 0.080              | 0.480              | 1.809           | -2.048             | 0.203                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | 0.81      | 0.360 26.116         |
| 10/16/2013 11:23 0917-173 | 1      | 1        | -2.31      | 1.249          | 0.028              | 0.079              | 0.857                    | 0.0840             | 0.460              | 1.798           | -2.103             | 0.202                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | -0.53     | 0.376 26.368         |
| 10/16/2013 11:24 0917-173 | 1      | 1        | 0.026      | 1.211          | -0.015             | 0.077              | 0.790                    | 0.0810             | 0.440              | 1.808           | -1.796             | 0.178                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | -0.43     | 0.376 23.445         |
| 10/16/2013 11:25 0917-173 | 1      | 1        | -1.126     | 1.185          | -0.0510            | 0.081              | 0.752                    | 0.0810             | 0.530              | 1.807           | -2.042             | 0.188                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | -0.46     | 0.355 25.226         |
| 10/16/2013 11:26 0917-173 | 1      | 1        | -1.786     | 1.254          | -0.0460            | 0.081              | 0.724                    | 0.0780             | 0.508              | 1.798           | -2.153             | 0.213                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | -0.45     | 0.382 23.988         |
| 10/16/2013 11:27 0917-173 | 1      | 1        | -0.28      | 1.305          | -0.0750            | 0.087              | 0.727                    | 0.0860             | 0.648              | 1.807           | -2.78              | 0.255                 | -0.0090   | 0.0000                    | -0.0090   | 0.0000             | -1.41     | 0.387 36.09          |
| 10/16/2013 11:28 0917-173 | 1      | 1        | -0.1       | 1.166          | -0.0620            | 0.088              | 0.824                    | 0.0830             | 0.399              | 1.803           | -1.003             | 0.266                 | -0.0040   | 0.0000                    | -0.0040   | 0.0000             | 0.91      | 0.355 38.123         |
| 10/16/2013 11:29 0917-173 | 1      | 1        | -1.894     | 1.245          | -0.1570            | 0.084              | 0.866                    | 0.0870             | 0.402              | 1.803           | -2.004             | 0.278                 | -0.0040   | 0.0000                    | -0.0040   | 0.0000             | -1.01     | 0.376 37.997         |
| 10/16/2013 11:30 0917-173 | 1      | 1        | -3.270     | 1.282          | -0.001             | 0.094              | 0.796                    | 0.082              | 0.410              | 1.793           | -3.06              | 0.288                 | -0.0020   | 0.0000                    | -0.0020   | 0.0000             | -1.18     | 0.394 41.422         |
| 10/16/2013 11:31 0917-173 | 1      | 1        | -0.95      | 1.181          | -0.0660            | 0.084              | 0.867                    | 0.0830             | 0.366              | 1.798           | -3.15              | 0.284                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | -0.6      | 0.349 40.652         |
| 10/16/2013 11:32 0917-173 | 1      | 1        | 0.20       | 1.353          | -0.041             | 0.084              | 0.847                    | 0.0850             | 0.383              | 1.797           | -1.089             | 0.289                 | -0.0040   | 0.0000                    | -0.0040   | 0.0000             | -0.2      | 0.401 40.986         |
| 10/16/2013 11:33 0917-173 | 1      | 1        | -0.108     | 1.08           | 0.006              | 0.080              | 0.826                    | 0.0830             | 0.465              | 1.796           | -2.45              | 0.284                 | -0.0000   | 0.0000                    | -0.0000   | 0.0000             | 0.68      | 0.357 34.656         |
| 10/16/2013 11:34 0917-173 | 1      | 1        | -0.490     | 1.280          | -0.044             | 0.083              | 0.836                    | 0.0810             | 0.488              | 1.802           | -2.505             | 0.227                 | -0.0070   | 0.0000                    | -0.0070   | 0.0000             | -0        |                      |















| Location                                          | Disc.  | #        | Start/Stop | Instrument | Label<br>6-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                     |           |              |
|---------------------------------------------------|--------|----------|------------|------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|---------------------|-----------|--------------|
| Date                                              | Method | Filename | OF         | Acroline   | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur_Hexafluoride (ppm) | SEC (ppm) | acetalddehyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/15/2013 10:16 0917-173, No13_10_15_1016_29_594 |        |          | 1          | 0.136      | 1.046              | 0.067              | 0.017                    | 0.315              | 0.439              | 0.000           | 0.000              | 0.000                 | 0.000     | 0.000                     | 0.000     | 0.000               | 0.000     | 0.000        |
| 10/15/2013 10:17 0917-173, No13_10_15_1017_23_324 |        |          | 1          | 0.7110     | 0.901              | -0.0170            | 0.055                    | 0.157              | 0.040              | 0.0320          | 0.0730             | 0.134                 | 0.088     | -0.0060                   | 0.00200   | -0.873              | 0.284     | 0.383        |
| 10/15/2013 10:18 0917-173, No13_10_15_1018_24_344 |        |          | 1          | 0.999      | 1.062              | 0.0460             | 0.064                    | 2.26               | 0.0650             | 0.299           | 1.141              | -0.462                | 0.103     | 0.00100                   | 0.00200   | -0.395              | 0.336     | 3.909        |
| 10/15/2013 10:19 0917-173, No13_10_15_1019_24_344 |        |          | 1          | 1.193      | 1.225              | -0.020             | 0.0670                   | 3.05               | 0.0910             | 0.402           | 1.688              | -0.773                | 0.117     | -0.00400                  | 0.00300   | -0.720              | 0.351     | 5.806        |
| 10/15/2013 10:20 0917-173, No13_10_15_1020_24_364 |        |          | 1          | 1.6790     | 1.063              | 0.029              | 0.068                    | 3.11               | 0.0910             | 0.201           | 1.720              | -0.8940               | 0.114     | -0.00700                  | 0.00300   | 0.16                | 0.348     | 6.161        |
| 10/15/2013 10:21 0917-173, No13_10_15_1021_24_404 |        |          | 1          | -0.4620    | 1.199              | 0.0780             | 0.067                    | 3.16               | 0.0890             | 0.469           | 1.718              | -0.761                | 0.118     | -0.00300                  | 0.00200   | -0.51               | 0.362     | 6.674        |
| 10/15/2013 10:22 0917-173, No13_10_15_1022_26_154 |        |          | 1          | -1.127     | 1.092              | -0.008             | 0.070                    | 3.04               | 0.0880             | 0.493           | 1.720              | -0.903                | 0.118     | -0.00200                  | 0.00300   | -0.56               | 0.342     | 5.824        |
| 10/15/2013 10:23 0917-173, No13_10_15_1023_26_164 |        |          | 1          | 1.475      | 1.075              | 0.052              | 0.065                    | 3.12               | 0.0900             | 0.436           | 1.722              | -0.660                | 0.112     | -0.00200                  | 0.00300   | -0.44               | 0.332     | 5.844        |
| 10/15/2013 10:24 0917-173, No13_10_15_1024_27_084 |        |          | 1          | -0.6640    | 1.166              | 0.195              | 0.070                    | 3.10               | 0.0950             | 0.366           | 1.717              | -0.741                | 0.113     | -0.00200                  | 0.00300   | -0.10               | 0.342     | 5.739        |
| 10/15/2013 10:25 0917-173, No13_10_15_1025_28_404 |        |          | 1          | 0.031      | 1.154              | 0.102              | 0.071                    | 2.97               | 0.0900             | 0.456           | 1.718              | -0.660                | 0.120     | -0.00800                  | 0.00300   | 0.15                | 0.358     | 5.329        |
| 10/15/2013 10:26 0917-173, No13_10_15_1026_29_224 |        |          | 1          | 0.624      | 1.221              | -0.047             | 0.064                    | 2.79               | 0.0900             | 0.389           | 1.712              | -0.545                | 0.111     | -0.00400                  | 0.00300   | -0.578              | 0.344     | 5.098        |
| 10/15/2013 10:27 0917-173, No13_10_15_1027_30_064 |        |          | 1          | 0.156      | 1.079              | 0.067              | 0.064                    | 2.67               | 0.0830             | 0.419           | 1.705              | -0.683                | 0.109     | -0.00300                  | 0.00300   | -0.65               | 0.317     | 4.943        |
| 10/15/2013 10:28 0917-173, No13_10_15_1028_30_805 |        |          | 1          | -0.0030    | 1.154              | 0.1370             | 0.069                    | 2.76               | 0.0860             | 0.418           | 1.699              | -0.671                | 0.113     | -0.00200                  | 0.00300   | -0.277              | 0.367     | 4.988        |
| 10/15/2013 10:29 0917-173, No13_10_15_1029_31_375 |        |          | 1          | -0.055     | 1.175              | 0.1420             | 0.068                    | 2.84               | 0.0880             | 0.439           | 1.710              | -0.718                | 0.115     | -0.00700                  | 0.00300   | -0.756              | 0.352     | 3.373        |
| 10/15/2013 10:30 0917-173, No13_10_15_1030_32_305 |        |          | 1          | -1.157     | 1.150              | 0.123              | 0.073                    | 2.95               | 0.0900             | 0.469           | 1.713              | -0.677                | 0.121     | -0.00400                  | 0.00300   | -0.577              | 0.367     | 5.405        |
| 10/15/2013 10:31 0917-173, No13_10_15_1031_33_365 |        |          | 1          | -1.519     | 1.084              | 0.125              | 0.067                    | 3.03               | 0.0880             | 0.287           | 1.714              | -0.707                | 0.114     | -0.00300                  | 0.00300   | -0.35               | 0.351     | 5.576        |
| 10/15/2013 10:32 0917-173, No13_10_15_1032_33_755 |        |          | 1          | 0.692      | 1.087              | 0.0850             | 0.063                    | 3.11               | 0.0870             | 0.352           | 1.715              | -0.704                | 0.111     | -0.00900                  | 0.00300   | -0.508              | 0.333     | 5.769        |
| 10/15/2013 10:33 0917-173, No13_10_15_1033_34_495 |        |          | 1          | 0.166      | 1.097              | 0.043              | 0.073                    | 3.27               | 0.0910             | 0.467           | 1.730              | -0.669                | 0.122     | -0.00200                  | 0.00300   | -0.47               | 0.352     | 1.649        |
| 10/15/2013 10:34 0917-173, No13_10_15_1034_35_205 |        |          | 1          | -1.631     | 1.143              | 0.0790             | 0.070                    | 3.38               | 0.0920             | 0.279           | 1.736              | -0.763                | 0.119     | -0.00200                  | 0.00300   | -0.60               | 0.350     | 6.449        |
| 10/15/2013 10:35 0917-173, No13_10_15_1035_35_975 |        |          | 1          | 0.310      | 1.088              | -0.048             | 0.072                    | 3.38               | 0.0910             | 0.415           | 1.748              | -0.819                | 0.119     | -0.00500                  | 0.00300   | 0.22                | 0.340     | 6.27         |
| 10/15/2013 10:36 0917-173, No13_10_15_1036_36_835 |        |          | 1          | 0.047      | 1.116              | 0.0590             | 0.065                    | 3.40               | 0.0930             | 0.353           | 1.743              | -0.8380               | 0.114     | -0.00500                  | 0.00300   | 0.16                | 0.340     | 6.296        |
| 10/15/2013 10:37 0917-173, No13_10_15_1037_37_575 |        |          | 1          | 1.3108     | 1.199              | 0.013              | 0.067                    | 3.13               | 0.0900             | 0.438           | 1.735              | -0.533                | 0.116     | -0.00200                  | 0.00300   | -0.30               | 0.358     | 5.643        |
| 10/15/2013 10:38 0917-173, No13_10_15_1038_38_265 |        |          | 1          | 0.448      | 1.142              | 0.0380             | 0.068                    | 3.19               | 0.0890             | 0.545           | 1.735              | -0.802                | 0.115     | -0.00500                  | 0.00300   | -0.69               | 0.359     | 5.811        |
| 10/15/2013 10:39 0917-173, No13_10_15_1039_39_115 |        |          | 1          | 0.8700     | 1.161              | 0.042              | 0.066                    | 3.32               | 0.0930             | 0.524           | 1.739              | -0.864                | 0.119     | -0.00100                  | 0.00300   | -0.35               | 0.350     | 6.198        |
| 10/15/2013 10:40 0917-173, No13_10_15_1040_39_786 |        |          | 1          | -0.465     | 1.205              | 0.093              | 0.068                    | 3.26               | 0.0880             | 0.421           | 1.741              | -0.796                | 0.119     | -0.00700                  | 0.00300   | -0.85               | 0.362     | 1.885        |
| 10/15/2013 10:41 0917-173, No13_10_15_1041_40_576 |        |          | 1          | -0.295     | 1.145              | 0.052              | 0.065                    | 2.45               | 0.0900             | 0.471           | 1.733              | -0.610                | 0.110     | -0.00200                  | 0.00300   | -0.10               | 0.366     | 5.999        |
| 10/15/2013 10:42 0917-173, No13_10_15_1042_41_326 |        |          | 1          | 0.7580     | 1.197              | 0.034              | 0.068                    | 2.83               | 0.0840             | 0.411           | 1.732              | -0.664                | 0.116     | 0.00000                   | 0.00300   | -0.51               | 0.353     | 4.24         |
| 10/15/2013 10:43 0917-173, No13_10_15_1043_42_126 |        |          | 1          | 0.4420     | 1.081              | 0.080              | 0.070                    | 2.76               | 0.0840             | 0.569           | 1.723              | -0.7660               | 0.115     | -0.00200                  | 0.00300   | -0.36               | 0.364     | 5.093        |
| 10/15/2013 10:44 0917-173, No13_10_15_1044_44_866 |        |          | 1          | 1.251      | 1.088              | 0.0620             | 0.066                    | 2.60               | 0.0820             | 0.508           | 1.715              | -0.641                | 0.110     | -0.00400                  | 0.00200   | -0.908              | 0.331     | 5.931        |
| 10/15/2013 10:45 0917-173, No13_10_15_1045_44_686 |        |          | 1          | -0.156     | 1.018              | 0.016              | 0.068                    | 2.68               | 0.0880             | 0.519           | 1.721              | -0.711                | 0.112     | -0.00400                  | 0.00300   | -0.587              | 0.340     | 4.98         |
| 10/15/2013 10:46 0917-173, No13_10_15_1046_44_456 |        |          | 1          | -0.137     | 1.063              | 0.062              | 0.069                    | 2.64               | 0.0840             | 0.579           | 1.690              | -0.570                | 0.115     | -0.00400                  | 0.00300   | -0.604              | 0.358     | 4.902        |
| 10/15/2013 10:47 0917-173, No13_10_15_1047_45_156 |        |          | 1          | -0.841     | 1.135              | 0.01               | 0.066                    | 2.51               | 0.0810             | 0.614           | 1.695              | -0.640                | 0.111     | -0.00600                  | 0.00200   | -0.68               | 0.344     | 4.565        |
| 10/15/2013 10:48 0917-173, No13_10_15_1048_45_966 |        |          | 1          | 0.727      | 1.117              | -0.012             | 0.067                    | 2.49               | 0.0810             | 0.591           | 1.721              | -0.614                | 0.114     | -0.00400                  | 0.00300   | -0.707              | 0.341     | 4.993        |
| 10/15/2013 10:49 0917-173, No13_10_15_1049_46_776 |        |          | 1          | -0.020     | 1.069              | 0.050              | 0.063                    | 2.29               | 0.0810             | 0.700           | 1.691              | -0.669                | 0.109     | -0.00200                  | 0.00300   | -0.65               | 0.327     | 5.213        |
| 10/15/2013 10:50 0917-173, No13_10_15_1050_47_546 |        |          | 1          | -1.4400    | 1.033              | -0.0100            | 0.063                    | 2.34               | 0.0840             | 0.360           | 1.676              | -0.757                | 0.109     | -0.00700                  | 0.00200   | -0.55               | 0.330     | 5.602        |
| 10/15/2013 10:51 0917-173, No13_10_15_1051_48_286 |        |          | 1          | -0.376     | 1.091              | 0.088              | 0.069                    | 2.36               | 0.0790             | 0.523           | 1.695              | -0.801                | 0.116     | -0.00500                  | 0.00300   | -0.29               | 0.341     | 6.084        |
| 10/15/2013 10:52 0917-173, No13_10_15_1052_49_107 |        |          | 1          | -0.358     | 1.143              | 0.045              | 0.065                    | 2.43               | 0.0780             | 0.503           | 1.705              | -0.714                | 0.117     | -0.00400                  | 0.00300   | -0.47               | 0.350     | 5.957        |
| 10/15/2013 10:53 0917-173, No13_10_15_1053_49_787 |        |          | 1          | 1.177      | 1.088              | -0.028             | 0.065                    | 2.08               | 0.0810             | 0.488           | 1.673              | -0.785                | 0.111     | -0.00700                  | 0.00200   | -0.51               | 0.329     | 6.501        |
| 10/15/2013 10:54 0917-173, No13_10_15_1054_50_567 |        |          | 1          | -2.184     | 1.122              | -0.025             | 0.067                    | 2.37               | 0.0830             | 0.582           | 1.695              | -0.891                | 0.117     | -0.00300                  | 0.00300   | -0.15               | 0.348     | 7.583        |
| 10/15/2013 10:55 0917-173, No13_10_15_1055_51_347 |        |          | 1          | 0.681      | 1.227              | -0.020             | 0.067                    | 2.45               | 0.0860             | 0.523           | 1.704              | -0.126                | 0.125     | -0.00200                  | 0.00300   | -0.37               | 0.368     | 6.83         |
| 10/15/2013 10:56 0917-173, No13_10_15_1056_51_137 |        |          | 1          | 1.591      | 1.134              | 0.067              | 0.072                    | 2.32               | 0.0820             | 0.520           | 1.713              | -0.975                | 0.121     | -0.00600                  | 0.00300   | -0.75               | 0.359     | 7.847        |
| 10/15/2013 10:57 0917-173, No13_10_15_1057_52_947 |        |          | 1          | 0.8880     | 1.190              | 0.0470             | 0.070                    | 2.28               | 0.0850             | 0.557           | 1.705              | -1.097                | 0.125     | -0.00500                  | 0.00300   | -1.19               | 0.378     | 8.885        |
| 10/15/2013 10:58 0917-173, No13_10_15_1058_53_697 |        |          | 1          | -1.611     | 1.179              | 0.0860             | 0.068                    | 2.51               | 0.0830             | 0.508           | 1.714              | -1.057                | 0.123     | -0.00900                  | 0.00300   | -0.43               | 0.354     | 8.051        |
| 10/15/2013 10:59 0917-173, No13_10_15_1059_54_417 |        |          | 1          | 0.760      | 1.129              | 0.061              | 0.070                    | 2.44               | 0.0820             | 0.591           | 1.718              | -0.967                | 0.125     | -0.00600                  | 0.00300   | -0.71               | 0.344     | 8.361        |
| 10/15/2013 11:00 0917-173, No13_10_15_1100_55_187 |        |          | 1          | 0.740      | 1.126              | -0.153             | 0.063                    | 2.65               | 0.0860             | 0.527           | 1.735              | -1.1500               | 0.114     | -0.00500                  | 0.00300   | -0.27               | 0.343     | 7.994        |
| 10/15/2013 11:01 0917-173, No13_10_15_1101_55_987 |        |          | 1          | 0.843      | 1.090              | -0.0210            | 0.0640                   | 2.70               | 0.0850             | 0.592           | 1.733              | -0.952                | 0.115     | -0.00300                  | 0.00300   | -0.54               | 0.322     | 7.798        |
| 10/15/2013 11:02 0917-173, No13_10_15_1102_56_787 |        |          | 1          | -1.200     | 1.129              | -0.0210            | 0.063                    | 2.60               | 0.0830             | 0.508           | 1.718              | -0.907                | 0.118     | -0.00400                  | 0.00300   | -0.90               | 0.334     | 8.214        |
| 10/15/2013 11:03 0917-173, No13_10_15_1103_57_478 |        |          | 1          | 0.250      | 1.123              | 0.053              | 0.070                    | 2.85               | 0.0830             | 0.595           | 1.711              | -0.980                | 0.121     | -0.00200                  | 0.00300   | -0.63               | 0.348     | 7.244        |
| 10/15/2013 11:04 0917-173, No13_10_15_1104_58_198 |        |          | 1          | 2.745      | 1.132              | -0.050             | 0.070                    | 3.00               | 0.0880             | 0.396           | 1.746              | -0.9470               | 0.123     | -0.00400                  | 0.00200   | -0.15               | 0.351     | 7.322        |
| 10/15/2013 11:05 0917-173, No13_10_15_1105_59_018 |        |          | 1          | 0.540      | 1.211              | 0.0150             | 0.068                    | 2.68               | 0.0860             | 0.402           | 1.739              | -1.017                | 0.123     | -0.00200                  | 0.00300   | -0.36               | 0.361     | 6.759        |
| 10/15/2013 11:06 0917-173, No13_10_15_1106_59_838 |        |          | 1          | -0.6010    | 1.081              | 0.060              | 0.068                    | 2.61               | 0.0840             | 0.396           | 1.738              | -0.945                | 0.126     | -0.00400                  | 0.00300   | -0.23               | 0.336     | 1.333        |
| 10/15/2013 11:08 0917-173, No13_10_15_1108_00_548 |        |          | 1          | 2.124      | 1.164              | -0.0090            | 0.064                    | 2.31               | 0.0810             | 0.574           | 1.709              | -0.658                | 0.112     | -0.00400                  | 0.00200   | -0.70               | 0.344     | 5.282        |
| 10/15/2013 11:09 0917-173, No13_10_15_1109_01_338 |        |          | 1          | -0.388     | 1.157              | 0.0140             | 0.063                    | 2.24               | 0.0810             | 0.512           | 1.692              | -0.727                | 0.109     | -0.00400                  | 0.00300   | -0.69               | 0.341     | 4.798        |
| 10/15/2013 11:10 0917-173, No13_10_15_1110_02_068 |        |          | 1          | -0.560     | 1.213              | 0.0270             | 0.070                    | 2.17               | 0.0800             | 0.621           | 1.703              | -0.588                | 0.115     | -0.00600                  | 0.00200   | -0.695</            |           |              |

| Location                  | Disc.                   | #        | Start/Stop | Instrument | Label<br>6-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                    |           |              |
|---------------------------|-------------------------|----------|------------|------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|--------------------|-----------|--------------|
| Date                      | Method                  | Filename | DF         | Aczroline  | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur_Hexafluoride (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/15/2013 12:54 0917-173 | 10,13,10,15,1254,31,012 | 1.240    | 1.081      | 0.002      | 0.072              | 0.000              | 0.000                    | 0.000              | 0.000              | 0.000           | 0.000              | 0.000                 | 0.000     | 0.000                     | 0.000     | 0.000              | 0.000     | 0.000        |
| 10/15/2013 12:55 0917-173 | 10,13,10,15,1255,31,762 | 1.010    | 1.081      | 0.090      | 0.062              | 0.0910             | 0.0610                   | 0.4910             | 1.313              | -0.123          | 0.102              | -0.0000               | 0.0000    | -0.7160                   | 0.335     | 1.987              | 0.435     | 1.084        |
| 10/15/2013 13:11 0917-173 | 10,13,10,15,1311,08,205 | 1        | 1.04       | -0.376     | 0.087              | -0.42              | -0.376                   | -0.0930            | 0.1070             | -0.036          | 0.137              | 0.006                 | 0.633     | -0.1350                   | 0.446     | -1.974             | 0.116     | -0.148       |
| 10/15/2013 13:11 0917-173 | 10,13,10,15,1311,26,705 | -1.3     | 1.5        | 0.01800    | 0.085              | -0.36              | 1.61                     | 0.116              | 0.1100             | 0.110           | 0.139              | 0.058                 | 0.447     | -0.389                    | 0.450     | -2.018             | 0.485     | -2.032       |
| 10/15/2013 13:11 0917-173 | 10,13,10,15,1311,46,395 | 1.1      | 1.6        | -0.138     | 0.088              | -0.44              | 1.64                     | -0.386             | 0.1040             | -0.000          | 0.145              | -0.076                | 0.056     | -0.20                     | 0.448     | -2.087             | 0.29      | 0.450        |
| 10/15/2013 13:12 0917-173 | 10,13,10,15,1312,08,885 | 0.2      | 1.5        | -0.303     | 0.083              | -0.46              | 1.65                     | -0.0930            | 0.1030             | 0.054           | 0.136              | 0.054                 | 0.661     | -0.398                    | 0.454     | -2.068             | 0.485     | -2.068       |
| 10/15/2013 13:12 0917-173 | 10,13,10,15,1312,22,355 | -1.3     | 1.5        | -0.205     | 0.086              | -0.44              | 1.66                     | -0.2570            | 0.1080             | -0.185          | 0.139              | 0.055                 | 0.661     | 0.80                      | 0.463     | -2.083             | 0.485     | -2.087       |
| 10/15/2013 13:12 0917-173 | 10,13,10,15,1312,41,005 | 1.5      | 1.5        | -0.0070    | 0.085              | -0.92              | 0.56                     | -0.1000            | 0.1758             | -0.1600         | 0.135              | -0.0000               | 0.0000    | -0.56                     | 0.448     | -2.087             | 0.485     | -2.087       |
| 10/15/2013 13:12 0917-173 | 10,13,10,15,1312,59,495 | 1.6      | 1.5        | -0.0350    | 0.084              | -0.44              | 1.66                     | -0.1050            | 0.1000             | -0.038          | 0.137              | 0.061                 | 0.663     | -0.5180                   | 0.457     | -2.06              | 0.485     | -2.06        |
| 10/15/2013 13:13 0917-173 | 10,13,10,15,1313,17,965 | 2.2      | 1.5        | 0.037      | 0.082              | -0.49              | 1.66                     | -0.0890            | 0.1100             | -0.051          | 0.135              | 0.067                 | 0.659     | -0.532                    | 0.451     | -2.092             | 0.485     | -2.092       |
| 10/15/2013 13:13 0917-173 | 10,13,10,15,1313,36,575 | -2.9     | 1.4        | -0.166     | 0.089              | -0.47              | 1.66                     | -0.1390            | 0.1040             | 0.006           | 0.138              | 0.062                 | 0.662     | 0.6500                    | 0.442     | -2.097             | 0.485     | -2.097       |
| 10/15/2013 13:13 0917-173 | 10,13,10,15,1313,55,075 | 1.5      | 1.5        | 0.1400     | 0.087              | 1.50               | 0.66                     | 0.040              | 0.1040             | 0.177           | 0.139              | 0.073                 | 0.657     | -1.68                     | 0.459     | -2.093             | 0.485     | -2.093       |
| 10/15/2013 13:14 0917-173 | 10,13,10,15,1314,13,675 | 3.4      | 1.6        | 0.032      | 0.081              | -0.48              | 1.66                     | -0.3900            | 0.1180             | -0.19900        | 0.137              | 0.076                 | 0.660     | -0.506                    | 0.454     | -2.08              | 0.485     | -2.08        |
| 10/15/2013 13:14 0917-173 | 10,13,10,15,1314,32,115 | -1.0     | 1.5        | 0.232      | 0.086              | -0.63              | 1.66                     | -0.2180            | 0.1100             | -0.033          | 0.135              | 0.059                 | 0.660     | -0.749                    | 0.453     | -2.071             | 0.485     | -2.071       |
| 10/15/2013 13:14 0917-173 | 10,13,10,15,1314,50,425 | 1        | 1.5        | -0.0070    | 0.085              | -0.92              | 0.56                     | -0.0590            | 0.1758             | -0.201          | 0.136              | -0.0000               | 0.0000    | -0.56                     | 0.447     | -2.085             | 0.485     | -2.085       |
| 10/15/2013 13:33 0917-173 | 10,13,10,15,1333,17,119 | -0.073   | 1.133      | -0.027     | 0.087              | 1.079              | 0.0970                   | 0.4190             | 1.807              | -2.625          | 0.223              | -0.00700              | 0.00000   | -0.41                     | 0.370     | 32.814             | 0.49      | 0.370        |
| 10/15/2013 13:34 0917-173 | 10,13,10,15,1334,17,799 | 1.402    | 1.199      | -0.061     | 0.083              | 1.093              | 0.0880                   | 0.4970             | 1.805              | -2.482          | 0.223              | -0.00600              | 0.00000   | -0.49                     | 0.357     | 32.813             | 0.49      | 0.357        |
| 10/15/2013 13:35 0917-173 | 10,13,10,15,1335,18,609 | 0.258    | 1.225      | -0.027     | 0.078              | 1.061              | 0.0880                   | 0.5060             | 1.790              | -2.461          | 0.228              | -0.00200              | 0.00000   | -0.85                     | 0.349     | 32.367             | 0.49      | 0.349        |
| 10/15/2013 13:36 0917-173 | 10,13,10,15,1336,19,369 | 1.896    | 1.202      | 0.015      | 0.082              | 1.083              | 0.0900                   | 0.396              | 1.780              | -2.658          | 0.240              | -0.00900              | 0.00000   | -0.64                     | 0.366     | 34.447             | 0.49      | 0.366        |
| 10/15/2013 13:37 0917-173 | 10,13,10,15,1337,20,129 | -0.351   | 1.213      | -0.090     | 0.084              | 1.068              | 0.0880                   | 0.421              | 1.784              | -2.739          | 0.241              | -0.00100              | 0.00000   | -0.35                     | 0.361     | 34.468             | 0.49      | 0.361        |
| 10/15/2013 13:38 0917-173 | 10,13,10,15,1338,20,929 | -0.073   | 1.127      | -0.340     | 0.096              | 0.359              | 0.0490                   | 0.3410             | 0.798              | -3.704          | 0.194              | 0.0                   | 0.00200   | -1.45                     | 0.403     | 19.232             | 0.49      | 0.403        |
| 10/15/2013 13:39 0917-173 | 10,13,10,15,1339,21,689 | -0.267   | 1.018      | -0.571     | 0.111              | -0.510             | 0.0480                   | -0.065             | 0.1530             | -4.44           | 0.193              | -0.01                 | 0.00200   | -1.82                     | 0.433     | 12.66              | 0.49      | 0.433        |
| 10/15/2013 13:40 0917-173 | 10,13,10,15,1340,22,460 | 0.074    | 1.005      | -0.677     | 0.107              | -0.0850            | 0.0470                   | 0.3930             | 0.1070             | -4.40           | 0.190              | -0.00800              | 0.00000   | -1.98                     | 0.402     | 12.318             | 0.49      | 0.402        |
| 10/15/2013 13:41 0917-173 | 10,13,10,15,1341,23,230 | -0.246   | 1.044      | -0.681     | 0.117              | -0.0790            | 0.0470                   | 0.5850             | 0.1000             | -4.43           | 0.197              | -0.00500              | 0.00200   | -1.60                     | 0.461     | 12.232             | 0.49      | 0.461        |
| 10/15/2013 13:42 0917-173 | 10,13,10,15,1342,23,980 | -0.551   | 1.005      | -0.6210    | 0.113              | -0.0770            | 0.0460                   | -0.114             | 0.0970             | -4.48           | 0.194              | -0.00500              | 0.00000   | -0.75                     | 0.446     | 12.159             | 0.49      | 0.446        |
| 10/15/2013 13:43 0917-173 | 10,13,10,15,1343,24,780 | 0.028    | 1.125      | -0.125     | 0.088              | 1.082              | 0.0450                   | 0.4500             | 0.265              | -2.086          | 0.246              | -0.006                | 0.00000   | -0.96                     | 0.412     | 12.61              | 0.49      | 0.412        |
| 10/15/2013 13:44 0917-173 | 10,13,10,15,1344,25,530 | 2.347    | 1.110      | -0.130     | 0.080              | 0.821              | 0.0730                   | 0.459              | 1.574              | -2.897          | 0.212              | -0.00900              | 0.00000   | -1.17                     | 0.340     | 29.361             | 0.49      | 0.340        |
| 10/15/2013 13:45 0917-173 | 10,13,10,15,1345,26,340 | 0.952    | 1.212      | -0.026     | 0.085              | 1.008              | 0.0790                   | 0.6090             | 1.793              | -2.80           | 0.247              | -0.00700              | 0.00000   | -0.39                     | 0.394     | 35.27              | 0.49      | 0.394        |
| 10/15/2013 13:46 0917-173 | 10,13,10,15,1346,27,110 | -0.611   | 1.178      | -0.015     | 0.083              | 0.960              | 0.0860                   | 0.5110             | 1.771              | -2.75           | 0.251              | -0.00300              | 0.00000   | -0.71                     | 0.354     | 36.785             | 0.49      | 0.354        |
| 10/15/2013 13:47 0917-173 | 10,13,10,15,1347,27,800 | 1.486    | 1.017      | -0.073     | 0.101              | 1.486              | 0.0730                   | 0.130              | 0.250              | -2.86           | 0.250              | -0.00100              | 0.00000   | -1.02                     | 0.365     | 39.468             | 0.49      | 0.365        |
| 10/15/2013 13:48 0917-173 | 10,13,10,15,1348,28,560 | 2.761    | 1.175      | -0.064     | 0.089              | 1.032              | 0.0880                   | 0.4600             | 1.773              | -2.86           | 0.270              | -0.00100              | 0.00000   | -1.22                     | 0.377     | 37.687             | 0.49      | 0.377        |
| 10/15/2013 13:49 0917-173 | 10,13,10,15,1349,29,260 | 2.984    | 1.297      | -0.066     | 0.091              | 1.064              | 0.0900                   | 0.58500            | 1.775              | -3.247          | 0.278              | -0.00100              | 0.00000   | -1.34                     | 0.402     | 41.066             | 0.49      | 0.402        |
| 10/15/2013 13:50 0917-173 | 10,13,10,15,1350,30,070 | 1.122    | 1.182      | -0.122     | 0.088              | 1.082              | 0.0880                   | 0.4740             | 1.791              | -2.963          | 0.263              | -0.00300              | 0.00000   | -0.96                     | 0.373     | 34.873             | 0.49      | 0.373        |
| 10/15/2013 13:51 0917-173 | 10,13,10,15,1351,30,870 | 0.917    | 1.199      | -0.017     | 0.088              | 1.132              | 0.0880                   | 0.4100             | 1.780              | -2.79           | 0.263              | -0.00000              | 0.00000   | -1.35                     | 0.381     | 38.249             | 0.49      | 0.381        |
| 10/15/2013 13:52 0917-173 | 10,13,10,15,1352,31,591 | 1.022    | 1.254      | 0.010      | 0.090              | 1.115              | 0.0880                   | 0.4830             | 1.781              | -3.130          | 0.274              | -0.00400              | 0.00000   | -0.55                     | 0.383     | 39.411             | 0.49      | 0.383        |
| 10/15/2013 13:53 0917-173 | 10,13,10,15,1353,31,351 | 1.833    | 1.219      | 0.024      | 0.089              | 1.130              | 0.0890                   | 0.5550             | 1.786              | -3.265          | 0.276              | -0.00800              | 0.00000   | -0.51                     | 0.377     | 40.529             | 0.49      | 0.377        |
| 10/15/2013 13:54 0917-173 | 10,13,10,15,1354,32,161 | 0.796    | 1.254      | 0.074      | 0.090              | 1.159              | 0.0880                   | 0.4650             | 1.787              | -3.027          | 0.277              | -0.00300              | 0.00000   | -0.97                     | 0.367     | 39.923             | 0.49      | 0.367        |
| 10/15/2013 13:55 0917-173 | 10,13,10,15,1355,33,891 | -1.421   | 1.193      | -0.006     | 0.087              | 1.119              | 0.0910                   | 0.40000            | 1.781              | -3.005          | 0.257              | -0.010                | 0.00400   | -1.22                     | 0.377     | 37.687             | 0.49      | 0.377        |
| 10/15/2013 13:56 0917-173 | 10,13,10,15,1356,34,631 | 0.700    | 1.177      | -0.073     | 0.084              | 1.151              | 0.0850                   | 0.271              | 1.777              | -2.88           | 0.256              | -0.00900              | 0.00000   | -1.27                     | 0.361     | 36.952             | 0.49      | 0.361        |
| 10/15/2013 13:57 0917-173 | 10,13,10,15,1357,34,441 | 1.424    | 1.123      | -0.154     | 0.084              | 1.029              | 0.0860                   | 0.4740             | 1.781              | -2.943          | 0.264              | -0.00400              | 0.00000   | -0.96                     | 0.373     | 34.873             | 0.49      | 0.373        |
| 10/15/2013 13:58 0917-173 | 10,13,10,15,1358,35,181 | -1.121   | 1.191      | -0.059     | 0.082              | 1.019              | 0.0860                   | 0.5600             | 1.764              | -2.705          | 0.235              | -0.00700              | 0.00000   | -0.26                     | 0.370     | 34.488             | 0.49      | 0.370        |
| 10/15/2013 13:59 0917-173 | 10,13,10,15,1359,36,931 | 0.902    | 1.256      | 0.059      | 0.084              | 0.971              | 0.0860                   | 0.701              | 1.779              | -2.761          | 0.246              | -0.00500              | 0.00000   | -0.58                     | 0.380     | 34.161             | 0.49      | 0.380        |
| 10/15/2013 14:00 0917-173 | 10,13,10,15,1400,37,771 | -0.409   | 1.100      | -0.10200   | 0.080              | 1.105              | 0.0870                   | 0.601              | 1.764              | -2.554          | 0.232              | -0.00300              | 0.00000   | -1.17                     | 0.345     | 34.17              | 0.49      | 0.345        |
| 10/15/2013 14:01 0917-173 | 10,13,10,15,1401,38,521 | 0.280    | 1.129      | -0.130     | 0.079              | 1.082              | 0.0890                   | 0.5100             | 1.765              | -2.675          | 0.240              | -0.00400              | 0.00000   | -1.31                     | 0.388     | 34.892             | 0.49      | 0.388        |
| 10/15/2013 14:02 0917-173 | 10,13,10,15,1402,39,241 | 2.138    | 1.169      | -0.039     | 0.085              | 1.144              | 0.0860                   | 0.50000            | 1.790              | -2.70           | 0.246              | -0.00200              | 0.00000   | -1.87                     | 0.373     | 35.757             | 0.49      | 0.373        |
| 10/15/2013 14:03 0917-173 | 10,13,10,15,1403,40,061 | 0.223    | 1.247      | -0.020     | 0.079              | 1.114              | 0.0890                   | 0.5740             | 1.774              | -2.639          | 0.243              | -0.00500              | 0.00000   | -0.74                     | 0.376     | 35.444             | 0.49      | 0.376        |
| 10/15/2013 14:04 0917-173 | 10,13,10,15,1404,40,781 | 3.227    | 1.205      | -0.160     | 0.081              | 1.205              | 0.0890                   | 0.4600             | 1.764              | -3.251          | 0.243              | -0.00800              | 0.00000   | -0.84                     | 0.381     | 35.675             | 0.49      | 0.381        |
| 10/15/2013 14:05 0917-173 | 10,13,10,15,1405,41,502 | 0.845    | 1.243      | -0.079     | 0.084              | 1.035              | 0.0880                   | 0.5720             | 1.765              | -2.701          | 0.240              | -0.01000              | 0.00000   | -1.32                     | 0.384     | 35.217             | 0.49      | 0.384        |
| 10/15/2013 14:06 0917-173 | 10,13,10,15,1406,42,382 | 0.760    | 1.185      | 0.106      | 0.080              | 0.964              | 0.0870                   | 0.5480             | 1.754              | -2.69           | 0.239              | -0.00500              | 0.00000   | -0.57                     | 0.366     | 34.49              | 0.49      | 0.366        |
| 10/15/2013 14:07 0917-173 | 10,13,10,15,1407,43,092 | 0.466    | 1.236      | 0.008      | 0.087              | 1.028              | 0.0850                   | 0.4040             | 1.757              | -2.739          | 0.248              | -0.00500              | 0.00000   | -0.14                     | 0.392     | 35.449             | 0.49      | 0.392        |
| 10/15/2013 14:08 0917-173 | 10,13,10,15,1408,44,182 | 2.09     | 1.154      | -0.096     | 0.084              | 1.054              | 0.0860                   | 0.4290             | 1.760              | -2.943          | 0.249              | -0.00400              | 0.00000   | -0.48                     | 0.360     | 32.705             | 0.49      | 0.360        |
| 10/15/2013 14:09 0917-173 | 10,13,10,15,1409,44,632 | 3.785    | 1.213      | -0.084     | 0.085              | 0.901              | 0.0860                   |                    |                    |                 |                    |                       |           |                           |           |                    |           |              |

152

| Location                                          | Disc.  | #        | Start/Stop     | Instrument | Label<br>6-Analyte | Label<br>2-Analyte | Label<br>3-Analyte | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte    |           |                           |           |                    |           |             |
|---------------------------------------------------|--------|----------|----------------|------------|--------------------|--------------------|--------------------|--------------------|--------------------|-----------------|-----------------------|-----------|---------------------------|-----------|--------------------|-----------|-------------|
| Date                                              | Method | Filename | Acroline (ppm) | SEC (ppm)  | Formaldehyde (ppm) | SEC (ppm)          | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)       | SEC (ppm)       | Propionaldehyde (ppm) | SEC (ppm) | Sulfur Hexafluoride (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) | pinene (pg) |
| 10/15/2013 18:55 0917-173, No13,10,15,1855,20,207 |        |          | -3.17          | 1.552      | 0.870              | 0.235              | 3.24               | 0.174              | -0.295             | 2.18            | -2.76                 | 0.90      | -0.0080                   | 0.00000   | -6.1               | 0.67      | 133.371     |
| 10/15/2013 18:56 0917-173, No13,10,15,1856,20,907 |        |          | -0.93          | 1.548      | 0.880              | 0.234              | 3.27               | 0.174              | -0.410             | 2.19            | -2.92                 | 0.91      | -0.0050                   | 0.00000   | -5.8               | 0.67      | 133.231     |
| 10/15/2013 18:57 0917-173, No13,10,15,1857,21,717 |        |          | -0.00          | 1.619      | 0.958              | 0.235              | 3.23               | 0.173              | -0.232             | 2.20            | -2.82                 | 0.91      | -0.0070                   | 0.00000   | -5.9               | 0.66      | 135.092     |
| 10/15/2013 18:59 0917-173, No13,10,15,1859,23,207 |        |          | -4.26          | 1.623      | 1.100              | 0.240              | 3.26               | 0.175              | -0.390             | 2.18            | -2.44                 | 0.92      | -0.0110                   | 0.00000   | -5.8               | 0.67      | 135.035     |
| 10/15/2013 19:00 0917-173, No13,10,15,1900,24,947 |        |          | -0.04          | 1.650      | 1.096              | 0.241              | 3.23               | 0.172              | -0.550             | 2.20            | -2.31                 | 0.92      | -0.0060                   | 0.00000   | -6.1               | 0.65      | 134.632     |
| 10/15/2013 19:01 0917-173, No13,10,15,1901,24,647 |        |          | -1.49          | 1.647      | 1.179              | 0.239              | 3.34               | 0.174              | -0.413             | 2.20            | -2.38                 | 0.92      | -0.0050                   | 0.00000   | -6.2               | 0.68      | 135.324     |
| 10/15/2013 19:02 0917-173, No13,10,15,1902,25,407 |        |          | -1.75          | 1.655      | 1.091              | 0.235              | 3.26               | 0.173              | -0.405             | 2.19            | -2.61                 | 0.92      | -0.0080                   | 0.00000   | -5.4               | 0.68      | 136.219     |
| 10/15/2013 19:03 0917-173, No13,10,15,1903,26,167 |        |          | -2.46          | 1.596      | 1.001              | 0.247              | 3.32               | 0.178              | -0.158             | 2.19            | -2.62                 | 0.93      | -0.0070                   | 0.00000   | -6.4               | 0.67      | 137.442     |
| 10/15/2013 19:04 0917-173, No13,10,15,1904,26,967 |        |          | -2.43          | 1.705      | 0.991              | 0.236              | 3.34               | 0.180              | -0.524             | 2.18            | -2.72                 | 0.92      | -0.0040                   | 0.00000   | -5.5               | 0.67      | 137.866     |
| 10/15/2013 19:05 0917-173, No13,10,15,1905,27,678 |        |          | -1.24          | 1.539      | 1.077              | 0.242              | 3.30               | 0.181              | -0.320             | 2.21            | -2.52                 | 0.92      | -0.0020                   | 0.00000   | -6.3               | 0.66      | 136.566     |
| 10/15/2013 19:06 0917-173, No13,10,15,1906,28,368 |        |          | -1.53          | 1.633      | 1.077              | 0.242              | 3.32               | 0.177              | -0.589             | 2.17            | -2.51                 | 0.92      | -0.0040                   | 0.00000   | -6.1               | 0.68      | 134.599     |
| 10/15/2013 19:07 0917-173, No13,10,15,1907,29,148 |        |          | -1.59          | 1.632      | 0.879              | 0.239              | 3.32               | 0.178              | -0.339             | 2.20            | -2.34                 | 0.90      | -0.0090                   | 0.00000   | -5.8               | 0.67      | 133.8       |
| 10/15/2013 19:08 0917-173, No13,10,15,1908,29,878 |        |          | -1.18          | 1.673      | 1.030              | 0.232              | 3.31               | 0.175              | -0.385             | 2.19            | -2.25                 | 0.89      | -0.0070                   | 0.00000   | -6.1               | 0.67      | 131.795     |
| 10/15/2013 19:09 0917-173, No13,10,15,1909,30,628 |        |          | -2.75          | 1.604      | 0.957              | 0.225              | 3.294              | 0.175              | -0.255             | 2.20            | -1.94                 | 0.87      | -0.0100                   | 0.00000   | -6.6               | 0.66      | 129.378     |
| 10/15/2013 19:10 0917-173, No13,10,15,1910,31,308 |        |          | -0.42          | 1.661      | 0.857              | 0.223              | 3.24               | 0.171              | -0.256             | 2.20            | -2.01                 | 0.86      | -0.0070                   | 0.00000   | -5.6               | 0.65      | 127.364     |
| 10/15/2013 19:11 0917-173, No13,10,15,1911,32,168 |        |          | -1.80          | 1.577      | 0.949              | 0.222              | 3.19               | 0.169              | -0.411             | 2.20            | -1.71                 | 0.84      | -0.0050                   | 0.00000   | -5.7               | 0.65      | 125.647     |
| 10/15/2013 19:12 0917-173, No13,10,15,1912,32,878 |        |          | -2.43          | 1.504      | 0.912              | 0.218              | 3.29               | 0.169              | -0.468             | 2.20            | -1.62                 | 0.83      | -0.0070                   | 0.00000   | -5.5               | 0.63      | 124.995     |
| 10/15/2013 19:13 0917-173, No13,10,15,1913,33,668 |        |          | -0.43          | 1.548      | 0.810              | 0.222              | 3.38               | 0.168              | -0.265             | 2.20            | -1.76                 | 0.84      | -0.0010                   | 0.00000   | -5.5               | 0.66      | 125.866     |
| 10/15/2013 19:14 0917-173, No13,10,15,1914,34,358 |        |          | -0.09          | 1.641      | 1.055              | 0.224              | 3.32               | 0.170              | -0.079             | 2.22            | -1.59                 | 0.85      | -0.0080                   | 0.00000   | -5.2               | 0.66      | 126.748     |
| 10/15/2013 19:15 0917-173, No13,10,15,1915,35,138 |        |          | -2.94          | 1.641      | 0.919              | 0.216              | 3.15               | 0.169              | -0.251             | 2.19            | -1.64                 | 0.83      | -0.0110                   | 0.00000   | -4.9               | 0.66      | 125.861     |
| 10/15/2013 19:16 0917-173, No13,10,15,1916,35,878 |        |          | -0.90          | 1.620      | 1.061              | 0.224              | 3.15               | 0.170              | -0.267             | 2.20            | -1.35                 | 0.84      | -0.0000                   | 0.00000   | -5.8               | 0.66      | 125.188     |
| 10/15/2013 19:17 0917-173, No13,10,15,1917,36,589 |        |          | -1.70          | 1.665      | 0.970              | 0.215              | 3.10               | 0.168              | -0.206             | 2.20            | -1.33                 | 0.82      | -0.0050                   | 0.00000   | -5.8               | 0.67      | 123.83      |
| 10/15/2013 19:18 0917-173, No13,10,15,1918,37,339 |        |          | -1.21          | 1.547      | 1.114              | 0.220              | 3.03               | 0.165              | -0.175             | 2.19            | -1.34                 | 0.82      | -0.0080                   | 0.00000   | -5.8               | 0.65      | 122.158     |
| 10/15/2013 19:19 0917-173, No13,10,15,1919,38,159 |        |          | -0.50          | 1.619      | 0.888              | 0.214              | 3.03               | 0.162              | -0.455             | 2.19            | -0.91                 | 0.80      | -0.0060                   | 0.00000   | -6.4               | 0.66      | 119.804     |
| 10/15/2013 19:20 0917-173, No13,10,15,1920,38,909 |        |          | -0.93          | 1.749      | 0.925              | 0.232              | 3.16               | 0.165              | -0.213             | 2.20            | -0.70                 | 0.80      | -0.0070                   | 0.00000   | -6.2               | 0.68      | 120.18      |
| 10/15/2013 19:21 0917-173, No13,10,15,1921,39,459 |        |          | -1.13          | 1.662      | 0.872              | 0.213              | 2.98               | 0.163              | -0.222             | 2.19            | -1.04                 | 0.80      | -0.0080                   | 0.00000   | -6.2               | 0.64      | 120.166     |
| 10/15/2013 19:22 0917-173, No13,10,15,1922,40,209 |        |          | -1.39          | 1.686      | 0.989              | 0.217              | 3.00               | 0.164              | -0.039             | 2.19            | -1.16                 | 0.80      | -0.0050                   | 0.00000   | -5.6               | 0.65      | 120.647     |
| 10/15/2013 19:23 0917-173, No13,10,15,1923,41,009 |        |          | -4.19          | 1.576      | 0.918              | 0.212              | 3.00               | 0.163              | -0.285             | 2.19            | -1.15                 | 0.81      | -0.0050                   | 0.00000   | -5.5               | 0.66      | 120.967     |
| 10/15/2013 19:24 0917-173, No13,10,15,1924,41,719 |        |          | -0.91          | 1.580      | 0.980              | 0.214              | 2.91               | 0.162              | -0.014             | 2.19            | -0.81                 | 0.81      | -0.0040                   | 0.00000   | -6.1               | 0.64      | 121.666     |
| 10/15/2013 19:25 0917-173, No13,10,15,1925,41,529 |        |          | -0.02          | 1.533      | 0.761              | 0.214              | 2.86               | 0.165              | -0.280             | 2.19            | -1.17                 | 0.80      | -0.0060                   | 0.00000   | -6.0               | 0.63      | 121.711     |
| 10/15/2013 19:26 0917-173, No13,10,15,1926,42,449 |        |          | -2.83          | 1.628      | 0.911              | 0.215              | 2.91               | 0.165              | -0.164             | 2.20            | -1.08                 | 0.81      | -0.0020                   | 0.00000   | -6.6               | 0.66      | 120.843     |
| 10/15/2013 19:27 0917-173, No13,10,15,1927,43,949 |        |          | -1.53          | 1.615      | 0.925              | 0.215              | 2.91               | 0.165              | -0.099             | 2.20            | -1.10                 | 0.81      | -0.0030                   | 0.00000   | -6.3               | 0.62      | 121.412     |
| 10/15/2013 19:28 0917-173, No13,10,15,1928,44,689 |        |          | -2.65          | 1.579      | 0.820              | 0.216              | 3.06               | 0.166              | -0.244             | 2.19            | -1.68                 | 0.82      | -0.0050                   | 0.00000   | -6.6               | 0.62      | 123.985     |
| 10/15/2013 19:29 0917-173, No13,10,15,1929,45,530 |        |          | -0.12          | 1.583      | 0.694              | 0.220              | 3.08               | 0.170              | -0.298             | 2.18            | -2.03                 | 0.82      | -0.0060                   | 0.00000   | -5.0               | 0.64      | 122.744     |
| 10/15/2013 19:30 0917-173, No13,10,15,1930,46,270 |        |          | -2.32          | 1.548      | 0.789              | 0.226              | 3.29               | 0.172              | -0.217             | 2.19            | -2.32                 | 0.84      | -0.0080                   | 0.00000   | -4.8               | 0.64      | 124.623     |
| 10/15/2013 19:31 0917-173, No13,10,15,1931,47,000 |        |          | -1.46          | 1.600      | 0.800              | 0.227              | 3.38               | 0.178              | -0.027             | 2.20            | -2.04                 | 0.84      | -0.0070                   | 0.00000   | -5.5               | 0.66      | 125.314     |
| 10/15/2013 19:32 0917-173, No13,10,15,1932,47,740 |        |          | -0.94          | 1.605      | 0.774              | 0.222              | 3.46               | 0.178              | -0.32              | 2.19            | -2.42                 | 0.85      | -0.0100                   | 0.00000   | -5.3               | 0.61      | 126.03      |
| 10/15/2013 19:33 0917-173, No13,10,15,1933,48,540 |        |          | -2.02          | 1.651      | 0.720              | 0.226              | 3.51               | 0.182              | -0.21              | 2.20            | -2.62                 | 0.85      | -0.0070                   | 0.00000   | -5.0               | 0.64      | 125.95      |
| 10/15/2013 19:34 0917-173, No13,10,15,1934,48,260 |        |          | -0.54          | 1.570      | 0.832              | 0.230              | 3.52               | 0.183              | -0.22              | 2.20            | -2.39                 | 0.84      | -0.0000                   | 0.00000   | -6.4               | 0.64      | 124.297     |
| 10/15/2013 19:35 0917-173, No13,10,15,1935,50,070 |        |          | -2.24          | 1.645      | 0.690              | 0.222              | 3.42               | 0.179              | -0.550             | 2.20            | -2.48                 | 0.83      | -0.0070                   | 0.00000   | -4.8               | 0.64      | 122.553     |
| 10/15/2013 19:36 0917-173, No13,10,15,1936,50,850 |        |          | -1.70          | 1.580      | 0.843              | 0.215              | 3.39               | 0.172              | -0.31              | 2.20            | -2.08                 | 0.81      | -0.0100                   | 0.00000   | -4.8               | 0.62      | 119.34      |
| 10/15/2013 19:37 0917-173, No13,10,15,1937,51,560 |        |          | -1.13          | 1.532      | 0.714              | 0.208              | 3.38               | 0.175              | -0.302             | 2.20            | -2.27                 | 0.79      | -0.0040                   | 0.00000   | -4.0               | 0.61      | 117.733     |
| 10/15/2013 19:38 0917-173, No13,10,15,1938,52,260 |        |          | -0.91          | 1.586      | 0.791              | 0.206              | 3.28               | 0.166              | -0.296             | 2.20            | -2.18                 | 0.78      | -0.0050                   | 0.00000   | -4.9               | 0.61      | 116.433     |
| 10/15/2013 19:39 0917-173, No13,10,15,1939,53,120 |        |          | -0.32          | 1.679      | 0.775              | 0.203              | 3.21               | 0.165              | -0.081             | 2.21            | -1.89                 | 0.76      | -0.0050                   | 0.00000   | -4.6               | 0.62      | 114.317     |
| 10/15/2013 19:40 0917-173, No13,10,15,1940,54,831 |        |          | -1.88          | 1.519      | 0.839              | 0.204              | 3.21               | 0.162              | -0.023             | 2.19            | -1.76                 | 0.75      | -0.0090                   | 0.00000   | -4.8               | 0.58      | 112.735     |
| 10/15/2013 19:41 0917-173, No13,10,15,1941,54,551 |        |          | -1.31          | 1.533      | 0.812              | 0.213              | 3.13               | 0.161              | -0.192             | 2.20            | -1.74                 | 0.75      | -0.0050                   | 0.00000   | -4.6               | 0.61      | 111.231     |
| 10/15/2013 19:42 0917-173, No13,10,15,1942,55,311 |        |          | -0.87          | 1.715      | 0.836              | 0.198              | 3.13               | 0.161              | -0.111             | 2.19            | -1.80                 | 0.74      | -0.0070                   | 0.00000   | -4.4               | 0.64      | 110.254     |
| 10/15/2013 19:43 0917-173, No13,10,15,1943,56,131 |        |          | 0.01           | 1.646      | 0.788              | 0.196              | 3.16               | 0.165              | -0.124             | 2.21            | -1.88                 | 0.74      | -0.0120                   | 0.00000   | -5.5               | 0.61      | 110.896     |
| 10/15/2013 19:44 0917-173, No13,10,15,1944,56,911 |        |          | -0.00          | 1.631      | 0.847              | 0.202              | 3.14               | 0.161              | -0.023             | 2.19            | -1.71                 | 0.74      | -0.0040                   | 0.00000   | -5.1               | 0.58      | 110.201     |
| 10/15/2013 19:45 0917-173, No13,10,15,1945,57,631 |        |          | -0.25          | 1.595      | 0.765              | 0.205              | 3.16               | 0.165              | -0.099             | 2.20            | -1.73                 | 0.73      | -0.0050                   | 0.00000   | -4.3               | 0.60      | 108.8       |
| 10/15/2013 19:46 0917-173, No13,10,15,1946,58,371 |        |          | -0.83          | 1.630      | 0.860              | 0.198              | 2.95               | 0.158              | -0.014             | 2.19            | -1.54                 | 0.72      | -0.0100                   | 0.00000   | -3.9               | 0.60      | 108.422     |
| 10/15/2013 19:47 0917-173, No13,10,15,1947,59,161 |        |          | 0.88           | 1.639      | 0.890              | 0.191              | 2.99               | 0.156              | -0.046             | 2.19            | -1.38                 | 0.72      | -0.0100                   | 0.00000   | -4.7               | 0.59      | 108.048     |
| 10/15/2013 19:48 0917-173, No13,10,15,1948,59,301 |        |          | -3.40          | 1.245      | -1.053             | 0.258              | 0.848              | 0.090              | 0.226              | 1.345           | -9.11                 | 0.55      | -0.0090                   | 0.00000   | -3.70              | 0.80      | 57.557      |
| 10/15/2013 19:50 0917-173, No13,10,15,1950,59,214 |        |          | -0.72          | 1.214      | -1.023             | 0.271              | 0.932              | 0.107              | 0.220              | 1.353           | -9.27                 | 0.53      | -0.0090                   | 0.00000   | -3.09              | 0.59      | 58.253      |
| 10/15/2013 19:51 0917-173, No13,10,15,1951,00,461 |        |          | -1.32          | 1.410      | -2.025             | 0.314              | -0.122             | 0.0950             | -0.270             | 0.202           | -13.29                | 0.54      | -0.0130                   | 0.00000   | -3.49              | 1.06      | 37.928      |
| 10/15/2013 19:52 0917-173, No13,10,15,1952,00,181 |        |          | -5.259         | 1.377      | -2.030             | 0.313              | -0.230             | 0.0990             | -0.480             | 0.202           | -13.23                | 0.53      | -0.0090                   | 0.00000   | -3.85              | 1.04      | 37.713      |
| 10/15/2013 19:53 0917-173, No13,10,15,1953,00,962 |        |          | -4.158         | 1.205      | -1.961             | 0.285              | -0.180             | 0.0950             | -0.480             | 0.202           | -13.23                | 0.53      | -0.0090                   | 0.00000   | -3.85              | 1.04      | 30.718      |
| 10/15/2013 19:54 0917-173, No13,1                 |        |          |                |            |                    |                    |                    |                    |                    |                 |                       |           |                           |           |                    |           |             |

| Location                  | Disc.                  | #        | Start/Stop | Instrument | Label<br>6-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                    |           |              |
|---------------------------|------------------------|----------|------------|------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|--------------------|-----------|--------------|
| Date                      | Method                 | Filename | OF         | Acrolein   | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur_Hexafluoride (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/15/2013 21:30 0917-173 | No13_10_15_2130_26_484 | 1        | -0.311     | 3.111      | 2.910              | 0.250              | -0.250                   | -0.183             | 0.00100            | 0.00000         | 0.00000            | -0.183                | 0.00000   | -0.00000                  | 0.00000   | -0.183             | 0.00000   | 0.282        |
| 10/15/2013 21:30 0917-173 | No13_10_15_2130_28_054 | 1        | 5.04       | 2.910      |                    | 0.03               | 0.167                    | -0.1070            | 0.138              | 0.48            | 2.017              | -0.478                | 0.269     | -0.02700                  | 0.00700   | -0.63              | 0.87      | 0.277        |
| 10/15/2013 21:30 0917-173 | No13_10_15_2130_28_884 | 1        | -2.321     | 3.111      |                    | -0.089             | 0.163                    | -0.255             | 0.141              | 0.720           | 1.968              | 0.20                  | 0.273     | -0.01800                  | 0.00700   | -1.712             | 0.92      | 0.331        |
| 10/15/2013 21:30 0917-173 | No13_10_15_2130_28_404 | 1        | 0.708      | 3.100      |                    | 0.053              | 0.166                    | -0.2510            | 0.140              | 0.42            | 1.896              | 0.02200               | 0.275     | -0.01700                  | 0.00800   | 0.0848             | 0.95      | 0.257        |
| 10/15/2013 21:30 0917-173 | No13_10_15_2130_27_444 | 1        | -2.249     | 3.019      |                    | 0.090              | 0.174                    | -0.1097            | 0.143              | 1.192           | 1.870              | -0.2050               | 0.278     | -0.01500                  | 0.00700   | -0.1600            | 0.92      | 0.235        |
| 10/15/2013 21:30 0917-173 | No13_10_15_2130_25_364 | 1        | -1.19      | 3.237      |                    | 0.070              | 0.174                    | -0.250             | 0.141              | 1.001           | 1.723              | -0.489                | 0.286     | -0.02100                  | 0.00700   | -0.04              | 0.95      | 0.23         |
| 10/15/2013 21:30 0917-173 | No13_10_15_2130_29_554 | 1        | -0.175     | 3.136      |                    | -0.003             | 0.172                    | -0.0090            | 0.139              | 0.625           | 1.619              | -0.051                | 0.284     | -0.02                     | 0.07000   | 0.016              | 0.94      | 0.07         |
| 10/15/2013 21:31 0917-173 | No13_10_15_2131_26_784 | 1        | -1.552     | 3.253      |                    | 0.04               | 0.170                    | -0.0580            | 0.143              | 0.56            | 1.524              | -0.14                 | 0.272     | -0.00300                  | 0.00800   | -1.267             | 0.91      | 0.142        |
| 10/15/2013 21:31 0917-173 | No13_10_15_2131_11_564 | 1        | -0.527     | 3.038      |                    | -0.083             | 0.179                    | -0.391             | 0.133              | 0.745           | 1.47               | -0.205                | 0.285     | -0.00300                  | 0.00700   | -0.408             | 0.95      | 0.129        |
| 10/15/2013 21:31 0917-173 | No13_10_15_2131_18_044 | 1        | -0.691     | 3.592      |                    | -0.192             | 0.180                    | -0.283             | 0.148              | 0.695           | 1.33               | -0.368                | 0.307     | -0.01700                  | 0.00800   | -2.20              | 1.02      | 0.071        |
| 10/15/2013 21:31 0917-173 | No13_10_15_2131_24_244 | 1        | -2.44      | 3.072      |                    | -0.137             | 0.183                    | -0.1880            | 0.143              | 1.167           | 1.31               | 0.548                 | 0.292     | -0.02300                  | 0.00700   | -3.64              | 0.95      | 0.029        |
| 10/15/2013 21:31 0917-173 | No13_10_15_2131_30_454 | 1        | -1.548     | 3.147      |                    | 0.099              | 0.175                    | -0.250             | 0.146              | 1.274           | 1.29               | -0.078                | 0.287     | -0.00500                  | 0.00700   | -2.33              | 0.86      | 0.018        |
| 10/15/2013 21:31 0917-173 | No13_10_15_2131_36_724 | 1        | -1.848     | 3.564      |                    | 0.349              | 0.185                    | -0.615             | 0.148              | 0.49            | 1.24               | -0.41                 | 0.308     | -0.00800                  | 0.00800   | -3.30              | 1.04      | 0.03         |
| 10/15/2013 21:31 0917-173 | No13_10_15_2131_42_884 | 1        | -1.741     | 3.395      |                    | -0.422             | 0.167                    | -0.1340            | 0.152              | 1.380           | 1.37               | 0.04                  | 0.288     | -0.02200                  | 0.00800   | -1.26              | 0.96      | 0.076        |
| 10/15/2013 21:31 0917-173 | No13_10_15_2131_49_054 | 1        | -0.129     | 3.132      |                    | 0.220              | 0.180                    | -0.242             | 0.143              | 1.426           | 1.43               | 0.302                 | 0.272     | -0.01100                  | 0.00800   | -1.246             | 1.02      | 0.147        |
| 10/15/2013 21:31 0917-173 | No13_10_15_2131_56_204 | 1        | 1.26       | 3.222      |                    | -0.181             | 0.190                    | -0.1320            | 0.140              | 0.884           | 1.42               | 0.451                 | 0.305     | -0.0110                   | 0.00800   | -0.71              | 0.97      | 0.073        |
| 10/15/2013 21:32 0917-173 | No13_10_15_2132_01_384 | 1        | -4.143     | 3.232      |                    | 0.2790             | 0.178                    | -0.1420            | 0.148              | 1.993           | 1.497              | -0.046                | 0.293     | -0.01300                  | 0.00800   | -1.83              | 0.99      | 0.147        |
| 10/15/2013 21:32 0917-173 | No13_10_15_2132_07_574 | 1        | -4.996     | 3.308      |                    | 0.339              | 0.173                    | -0.0810            | 0.147              | 1.381           | 1.582              | 0.06                  | 0.288     | -0.00900                  | 0.00700   | -1.64              | 1.01      | 0.174        |
| 10/15/2013 21:32 0917-173 | No13_10_15_2132_15_664 | 1        | -0.999     | 3.256      |                    | 0.091              | 0.175                    | -0.1350            | 0.142              | 1.019           | 1.514              | 0.053                 | 0.290     | -0.01000                  | 0.00800   | -0.92              | 0.95      | 0.139        |
| 10/15/2013 21:32 0917-173 | No13_10_15_2132_19_844 | 1        | -4.833     | 3.574      |                    | 0.201              | 0.176                    | -0.141             | 0.150              | 1.366           | 1.575              | 0.12                  | 0.300     | -0.02300                  | 0.00700   | -2.70              | 1.05      | 0.273        |
| 10/15/2013 21:32 0917-173 | No13_10_15_2132_26_064 | 1        | 0.008      | 3.492      |                    | 0.302              | 0.170                    | -0.220             | 0.141              | 1.283           | 1.536              | -0.130                | 0.290     | 0.00900                   | 0.00700   | -2.52              | 0.98      | 0.262        |
| 10/15/2013 21:32 0917-173 | No13_10_15_2132_28_244 | 1        | -3.584     | 3.378      |                    | 0.023              | 0.192                    | 0.224              | 0.144              | 1.279           | 1.582              | -0.328                | 0.285     | -0.01200                  | 0.00700   | -1.98              | 0.95      | 0.217        |
| 10/15/2013 21:32 0917-173 | No13_10_15_2132_28_444 | 1        | 1.07       | 3.040      |                    | -0.205             | 0.173                    | -0.175             | 0.141              | 0.62            | 1.557              | 0.53                  | 0.282     | -0.02400                  | 0.00700   | -4.61              | 0.53      | 0.256        |
| 10/15/2013 21:32 0917-173 | No13_10_15_2132_44_534 | 1        | 0.3960     | 3.287      |                    | 0.107              | 0.181                    | -0.0940            | 0.139              | 0.773           | 1.594              | 0.27                  | 0.297     | -0.01400                  | 0.00700   | -1.467             | 0.97      | 0.245        |
| 10/15/2013 21:32 0917-173 | No13_10_15_2132_50_814 | 1        | -2.607     | 3.420      |                    | -0.035             | 0.169                    | -0.0790            | 0.150              | 0.771           | 1.608              | 0.22                  | 0.287     | -0.01900                  | 0.00700   | -1.278             | 0.98      | 0.338        |
| 10/15/2013 21:32 0917-173 | No13_10_15_2132_56_904 | 1        | -0.726     | 3.380      |                    | -0.236             | 0.180                    | -0.255             | 0.147              | 0.655           | 1.541              | 0.0293                | 0.293     | -0.01600                  | 0.00700   | -1.13              | 1.00      | 0.292        |
| 10/15/2013 21:33 0917-173 | No13_10_15_2133_03_164 | 1        | -2.815     | 3.086      |                    | -0.363             | 0.162                    | 0.169              | 0.137              | 1.597           | 1.464              | -0.03                 | 0.268     | -0.00400                  | 0.00800   | -1.60              | 0.882     | 0.323        |
| 10/15/2013 21:33 0917-173 | No13_10_15_2133_09_364 | 1        | -4.841     | 3.217      |                    | -0.209             | 0.175                    | -0.1390            | 0.145              | 1.513           | 1.564              | -0.34                 | 0.29      | -0.00200                  | 0.00700   | -1.07              | 0.99      | 0.311        |
| 10/15/2013 21:33 0917-173 | No13_10_15_2133_15_454 | 1        | -3.59      | 3.461      |                    | 0.008              | 0.171                    | -0.0040            | 0.146              | 1.177           | 1.529              | -0.065                | 0.294     | -0.01200                  | 0.00700   | -1.139             | 1.02      | 0.157        |
| 10/15/2013 21:33 0917-173 | No13_10_15_2133_17_724 | 1        | -5.800     | 3.140      |                    | -0.066             | 0.170                    | -0.147             | 0.141              | 1.271           | 1.529              | 0.016                 | 0.286     | -0.01700                  | 0.00700   | -2.779             | 0.92      | 0.308        |
| 10/15/2013 21:33 0917-173 | No13_10_15_2133_27_854 | 1        | 4.266      | 3.073      |                    | 0.2390             | 0.180                    | -0.396             | 0.147              | 0.864           | 1.535              | 0.04                  | 0.29      | -0.01600                  | 0.00800   | 0.25               | 0.98      | 0.32         |
| 10/15/2013 21:33 0917-173 | No13_10_15_2133_34_044 | 1        | -7.154     | 3.168      |                    | -0.228             | 0.184                    | -0.1020            | 0.145              | 1.094           | 1.539              | -0.179                | 0.298     | -0.00700                  | 0.00800   | -2.00              | 1.01      | 0.403        |
| 10/15/2013 21:33 0917-173 | No13_10_15_2133_40_254 | 1        | -1.553     | 3.127      |                    | -0.157             | 0.175                    | -0.141             | 0.147              | 1.057           | 1.526              | 0.267                 | 0.287     | -0.01500                  | 0.00800   | -1.591             | 0.98      | 0.352        |
| 10/15/2013 21:33 0917-173 | No13_10_15_2133_46_344 | 1        | -5.792     | 3.111      |                    | 0.090              | 0.175                    | -0.1160            | 0.142              | 1.094           | 1.579              | -0.243                | 0.285     | -0.01100                  | 0.00800   | -1.00              | 0.91      | 0.414        |
| 10/15/2013 21:33 0917-173 | No13_10_15_2133_52_544 | 1        | -1.20      | 3.263      |                    | 0.1210             | 0.176                    | -0.0380            | 0.149              | 0.882           | 1.692              | -0.22                 | 0.289     | -0.00900                  | 0.00700   | -2.88              | 0.98      | 0.353        |
| 10/15/2013 21:34 0917-173 | No13_10_15_2134_06_824 | 1        | 0.6930     | 2.949      |                    | -0.126             | 0.178                    | -0.173             | 0.141              | 0.819           | 1.816              | 0.15                  | 0.280     | -0.01500                  | 0.00700   | -2.11              | 0.90      | 0.355        |
| 10/15/2013 21:34 0917-173 | No13_10_15_2134_06_004 | 1        | -2.380     | 3.140      |                    | -0.347             | 0.160                    | -0.140             | 0.140              | 0.774           | 1.529              | 0.074                 | 0.274     | -0.00700                  | 0.00800   | -1.743             | 0.94      | 0.453        |
| 10/15/2013 21:34 0917-173 | No13_10_15_2134_11_214 | 1        | -0.258     | 3.100      |                    | 0.123              | 0.160                    | 0.1130             | 0.141              | 1.083           | 1.933              | 0.00                  | 0.270     | -0.01900                  | 0.00800   | -2.56              | 0.89      | 0.449        |
| 10/15/2013 21:34 0917-173 | No13_10_15_2134_17_304 | 1        | 0.120      | 2.786      |                    | -0.012             | 0.162                    | -0.373             | 0.144              | 1.058           | 1.986              | 0.40                  | 0.262     | -0.00000                  | 0.00800   | -3.89              | 0.88      | 0.451        |
| 10/15/2013 21:34 0917-173 | No13_10_15_2134_24_504 | 1        | -12.61     | 3.235      |                    | -0.235             | 0.160                    | -0.140             | 0.140              | 1.443           | 1.957              | 0.261                 | 0.261     | -0.00200                  | 0.00800   | -0.47              | 0.84      | 0.471        |
| 10/15/2013 21:34 0917-173 | No13_10_15_2134_28_074 | 1        | 1.07       | 2.725      |                    | 0.305              | 0.170                    | -0.0260            | 0.145              | 0.79            | 2.049              | -0.067                | 0.268     | -0.00200                  | 0.00700   | -1.313             | 0.83      | 0.481        |
| 10/15/2013 21:34 0917-173 | No13_10_15_2134_35_864 | 1        | 4.523      | 3.028      |                    | 0.33               | 0.153                    | -0.060             | 0.130              | 0.892           | 2.060              | 0.073                 | 0.257     | -0.01300                  | 0.00700   | 0.294              | 0.861     | 0.551        |
| 10/15/2013 21:34 0917-173 | No13_10_15_2134_44_064 | 1        | 1.20       | 2.928      |                    | -0.033             | 0.157                    | -0.155             | 0.143              | 0.986           | 2.010              | -0.383                | 0.257     | -0.02700                  | 0.00700   | -1.37              | 0.86      | 0.555        |
| 10/15/2013 21:34 0917-173 | No13_10_15_2134_50_164 | 1        | -4.769     | 3.172      |                    | -0.469             | 0.164                    | -0.3530            | 0.146              | 0.972           | 1.991              | 0.275                 | 0.261     | -0.01100                  | 0.00700   | -0.299             | 0.90      | 0.499        |
| 10/15/2013 21:34 0917-173 | No13_10_15_2134_54_354 | 1        | -5.105     | 3.037      |                    | 0.0020             | 0.158                    | 0.0420             | 0.146              | 0.911           | 2.069              | -0.14                 | 0.264     | -0.02600                  | 0.00700   | -1.73              | 0.86      | 0.535        |
| 10/15/2013 21:35 0917-173 | No13_10_15_2135_05_544 | 1        | 0.426      | 3.086      |                    | -0.095             | 0.163                    | -0.0210            | 0.144              | 1.425           | 1.887              | 0.51                  | 0.276     | -0.01100                  | 0.00800   | -1.43              | 0.93      | 0.56         |
| 10/15/2013 21:35 0917-173 | No13_10_15_2135_08_544 | 1        | -0.130     | 3.135      |                    | -0.172             | 0.160                    | -0.138             | 0.138              | 1.472           | 1.893              | -0.293                | 0.260     | -0.01300                  | 0.00700   | -0.99              | 0.93      | 0.591        |
| 10/15/2013 21:35 0917-173 | No13_10_15_2135_11_004 | 1        | 0.110      | 3.393      |                    | 0.119              | 0.170                    | -0.280             | 0.145              | 1.300           | 1.705              | -0.388                | 0.290     | -0.02                     | 0.07000   | -0.629             | 0.99      | 0.386        |
| 10/15/2013 21:35 0917-173 | No13_10_15_2135_19_124 | 1        | -4.542     | 3.198      |                    | -0.25              | 0.165                    | -0.14000           | 0.148              | 0.891           | 1.725              | 0.144                 | 0.273     | -0.03000                  | 0.00800   | -1.072             | 0.94      | 0.332        |
| 10/15/2013 21:35 0917-173 | No13_10_15_2135_25_284 | 1        | -2.552     | 3.262      |                    | -0.285             | 0.164                    | -0.246             | 0.151              | 1.114           | 1.744              | 0.075                 | 0.277     | -0.02                     | 0.07000   | -0.16              | 0.92      | 0.376        |
| 10/15/2013 21:35 0917-173 | No13_10_15_2135_32_534 | 1        | -1.26      | 3.155      |                    | -0.275             | 0.158                    | -0.1010            | 0.145              | 1.275           | 1.834              | -0.485                | 0.283     | -0.02100                  | 0.00700   | -1.885             | 0.88      | 0.384        |
| 10/15/2013 21:35 0917-173 | No13_10_15_2135_37_714 | 1        | -0.662     | 3.207      |                    | -0.030             | 0.163                    | -0.400             | 0.147              | 1.309           | 1.642              | -0.39                 | 0.272     | -0.00100                  | 0.00800   | -1.41              | 0.90      | 0.455        |
| 10/15/2013 21:35 0917-173 | No13_10_15_2135_43_764 | 1        | -1.688     | 3.301      |                    | -0.109             | 0.176                    | -0.1200            | 0.136              | 1.167           | 1.716              | -0.211                | 0.290     | -0.00700                  | 0.00800   | -1.118             | 0.98      | 0.451        |
| 10/15/2013 21:35 0917-173 | No13_10_15_2135_50_004 | 1        | -7.028     | 3.337      |                    | 0.091              | 0.164                    | -0.150             | 0.153              | 1.095           | 1.757              | -0.062                | 0.287     | -0.01400                  | 0.00800   | -1.559             | 0.89      | 0.404        |
| 10/15/2013 21:35 0917-173 | No13_10_15_2135_56_204 | 1        | -1.410     | 2.989      |                    | -0.080             | 0.168                    | -0.                |                    |                 |                    |                       |           |                           |           |                    |           |              |

| Location                  | Disc.                  | #        | Start/Stop | Instrument     | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                    |           |             |
|---------------------------|------------------------|----------|------------|----------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|--------------------|-----------|-------------|
| Date                      | Method                 | Filename | OF         | Acroline (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur_Hexafluoride (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) | pinene (pg) |
| 10/16/2013 8:05 0917-173  | No13_10_16_0815_51_860 | 1        | 2.2        | 1.5            | 1.5                | 0.0680             | 0.085                    | -0.53              | 1.64               | 0.0030          | 0.0960             | -0.320                | 0.136     | 0.069                     | 0.662     | 0.35               | 0.449     | -2.027      |
| 10/16/2013 8:36 0917-173  | No13_10_16_0836_18_370 | 1        | -0.6       | 1.3            | -0.088             | 0.095              | -0.44                    | 1.65               | 0.057              | 0.0910          | -0.2190            | 0.139                 | 0.066     | 0.658                     | 0.537     | 0.442              | -0.609    |             |
| 10/16/2013 8:36 0917-173  | No13_10_16_0836_36_990 | 1        | 0.8        | 1.4            | 0.177              | 0.082              | -0.55                    | 1.65               | -0.0900            | 0.0990          | 0.0720             | 0.131                 | 0.059     | 0.661                     | -0.8000   | 0.444              | -2.023    |             |
| 10/16/2013 8:37 0917-173  | No13_10_16_0837_14_090 | 1        | 1.7        | 1.5            | 0.0960             | 0.079              | 0.66                     | 1.65               | 0.156              | 0.1060          | 0.284              | 0.132                 | 0.070     | 0.657                     | -0.2140   | 0.430              | -2.069    |             |
| 10/16/2013 8:37 0917-173  | No13_10_16_0837_35_591 | 1        | 2.1        | 1.4            | -0.0750            | 0.075              | -0.55                    | 1.66               | -0.1010            | 0.1060          | -0.234             | 0.122                 | 0.064     | 0.662                     | 0.3200    | 0.411              | -2.042    |             |
| 10/16/2013 8:37 0917-173  | No13_10_16_0837_51_001 | 1        | -0.6       | 1.5            | -0.001             | 0.088              | -0.62                    | 1.65               | -0.0740            | 0.0950          | -0.0830            | 0.141                 | 0.073     | 0.665                     | 0.87      | 0.476              | -2.043    |             |
| 10/16/2013 8:38 0917-173  | No13_10_16_0838_06_061 | 1        | 2.4        | 1.5            | 0.150              | 0.080              | -0.52                    | 1.65               | 0.0660             | 0.0910          | 0.076              | 0.138                 | 0.075     | 0.675                     | 0.217     | 0.472              | -2.05     |             |
| 10/16/2013 8:38 0917-173  | No13_10_16_0838_28_111 | 1        | -0.6       | 1.5            | -0.122             | 0.088              | -0.50                    | 1.65               | 0.1360             | 0.0990          | -0.142             | 0.141                 | 0.070     | 0.659                     | 0.047     | 0.459              | -2.045    |             |
| 10/16/2013 8:38 0917-173  | No13_10_16_0838_46_631 | 1        | -0.1       | 1.7            | -0.0710            | 0.076              | -0.61                    | 1.66               | -0.1360            | 0.1060          | 0.263              | 0.133                 | 0.074     | 0.664                     | -1.206    | 0.456              | -2.043    |             |
| 10/16/2013 8:39 0917-173  | No13_10_16_0839_05_251 | 1        | 2.2        | 1.4            | -0.011             | 0.079              | -0.46                    | 1.66               | 0.0660             | 0.1010          | 0.000              | 0.129                 | 0.071     | 0.661                     | -0.010    | 0.428              | -2.059    |             |
| 10/16/2013 8:39 0917-173  | No13_10_16_0839_29_781 | 1        | 0.4        | 1.5            | 0.055              | 0.084              | 0.65                     | 1.65               | 0.121              | 0.1040          | 0.015              | 0.137                 | 0.064     | 0.663                     | 0.464     | 0.443              | -2.016    |             |
| 10/16/2013 8:39 0917-173  | No13_10_16_0839_42_371 | 1        | -2.4       | 1.5            | -0.020             | 0.082              | -0.49                    | 1.65               | -0.142             | 0.1010          | 0.067              | 0.134                 | 0.064     | 0.664                     | 0.289     | 0.435              | -2.005    |             |
| 10/16/2013 8:40 0917-173  | No13_10_16_0840_00_791 | 1        | 0.5        | 1.6            | 0.061              | 0.081              | -0.49                    | 1.65               | -0.1410            | 0.1060          | -0.1700            | 0.136                 | 0.061     | 0.665                     | -0.490    | 0.466              | -2.007    |             |
| 10/16/2013 10:53 0917-173 | No13_10_16_1053_00_190 | 1        | 0.5        | 1.205          | -0.100             | 0.094              | 0.721                    | 0.0850             | 0.429              | 1.750           | -1.568             | 0.145                 | -0.0020   | 0.0500                    | 0.02      | 0.36               | 16.446    |             |
| 10/16/2013 10:54 0917-173 | No13_10_16_1054_00_360 | 1        | -0.09      | 1.253          | 0.080              | 0.067              | 0.554                    | 0.0760             | 0.326              | 1.743           | -1.130             | 0.144                 | -0.0010   | 0.0000                    | 1.13      | 0.368              | 15.707    |             |
| 10/16/2013 10:55 0917-173 | No13_10_16_1055_02_170 | 1        | 1.112      | 1.212          | -0.085             | 0.079              | 0.647                    | 0.0790             | 0.394              | 1.744           | -1.582             | 0.178                 | -0.0000   | 0.0000                    | -0.77     | 0.381              | 21.29     |             |
| 10/16/2013 10:56 0917-173 | No13_10_16_1056_02_880 | 1        | -2.953     | 1.244          | -0.042             | 0.078              | 0.724                    | 0.0840             | 0.564              | 1.758           | -1.808             | 0.188                 | -0.0050   | 0.0000                    | -0.73     | 0.379              | 23.836    |             |
| 10/16/2013 10:57 0917-173 | No13_10_16_1057_03_610 | 1        | -0.24      | 1.219          | -0.184             | 0.077              | 0.759                    | 0.0800             | 0.536              | 1.758           | -1.797             | 0.191                 | -0.0010   | 0.0000                    | -0.99     | 0.352              | 24.445    |             |
| 10/16/2013 10:58 0917-173 | No13_10_16_1058_04_380 | 1        | -2.570     | 1.235          | -0.038             | 0.085              | 0.816                    | 0.0810             | 0.552              | 1.759           | -2.046             | 0.203                 | -0.0010   | 0.0000                    | -1.12     | 0.389              | 26.209    |             |
| 10/16/2013 10:59 0917-173 | No13_10_16_1059_05_200 | 1        | -2.95      | 1.207          | 0.0360             | 0.079              | 0.815                    | 0.0810             | 0.538              | 1.757           | -1.73              | 0.184                 | -0.0010   | 0.0000                    | -1.32     | 0.363              | 23.742    |             |
| 10/16/2013 11:00 0917-173 | No13_10_16_1100_06_040 | 1        | -0.72      | 1.172          | 0.054              | 0.087              | 0.866                    | 0.0790             | 0.600              | 1.751           | -1.573             | 0.177                 | -0.0000   | 0.0000                    | -1.49     | 0.365              | 23.019    |             |
| 10/16/2013 11:01 0917-173 | No13_10_16_1101_06_711 | 1        | -0.285     | 1.259          | -0.044             | 0.076              | 0.878                    | 0.0850             | 0.361              | 1.732           | -1.508             | 0.191                 | -0.0010   | 0.0000                    | -1.07     | 0.376              | 25.125    |             |
| 10/16/2013 11:02 0917-173 | No13_10_16_1102_07_491 | 1        | -0.82      | 1.322          | -0.1160            | 0.081              | 0.787                    | 0.0800             | 0.558              | 1.729           | -2.02              | 0.201                 | -0.0010   | 0.0000                    | -1.39     | 0.388              | 26.538    |             |
| 10/16/2013 11:03 0917-173 | No13_10_16_1103_08_231 | 1        | -1.50      | 1.182          | 0.059              | 0.076              | 0.823                    | 0.0770             | 0.502              | 1.736           | -1.958             | 0.192                 | -0.0010   | 0.0000                    | -0.98     | 0.366              | 25.516    |             |
| 10/16/2013 11:04 0917-173 | No13_10_16_1104_09_061 | 1        | 0.45       | 1.270          | 0.120              | 0.081              | 0.752                    | 0.0810             | 0.530              | 1.777           | -1.863             | 0.204                 | -0.0010   | 0.0000                    | -0.87     | 0.367              | 24.884    |             |
| 10/16/2013 11:05 0917-173 | No13_10_16_1105_09_761 | 1        | -1.86      | 1.256          | 0.0060             | 0.077              | 0.832                    | 0.0770             | 0.459              | 1.718           | -1.994             | 0.194                 | -0.0010   | 0.0000                    | -0.83     | 0.379              | 26.146    |             |
| 10/16/2013 11:06 0917-173 | No13_10_16_1106_10_521 | 1        | -0.894     | 1.240          | 0.106              | 0.077              | 0.822                    | 0.0780             | 0.627              | 1.713           | -2.199             | 0.202                 | 0.00      | 0.0000                    | -0.11     | 0.386              | 27.025    |             |
| 10/16/2013 11:07 0917-173 | No13_10_16_1107_11_131 | 1        | -1.919     | 1.295          | 0.010              | 0.081              | 0.737                    | 0.0780             | 0.536              | 1.718           | -2.072             | 0.199                 | -0.0050   | 0.0000                    | -0.24     | 0.392              | 26.125    |             |
| 10/16/2013 11:08 0917-173 | No13_10_16_1108_12_081 | 1        | -1.846     | 1.266          | 0.064              | 0.079              | 0.816                    | 0.0780             | 0.646              | 1.719           | -2.080             | 0.200                 | -0.0010   | 0.0000                    | -0.79     | 0.355              | 21.16     |             |
| 10/16/2013 11:09 0917-173 | No13_10_16_1109_12_911 | 1        | -0.490     | 1.145          | -0.0680            | 0.079              | 0.767                    | 0.0810             | 0.502              | 1.727           | -1.818             | 0.182                 | -0.0020   | 0.0000                    | -0.68     | 0.374              | 23.557    |             |
| 10/16/2013 11:10 0917-173 | No13_10_16_1110_13_141 | 1        | -0.47      | 1.263          | -0.065             | 0.079              | 0.776                    | 0.0790             | 0.441              | 1.747           | -1.65              | 0.186                 | -0.0050   | 0.0000                    | -0.43     | 0.382              | 24.175    |             |
| 10/16/2013 11:11 0917-173 | No13_10_16_1111_14_401 | 1        | -0.85      | 1.295          | -0.085             | 0.085              | 0.771                    | 0.080              | 0.556              | 1.760           | -1.716             | 0.190                 | -0.0010   | 0.0000                    | -0.20     | 0.386              | 24.136    |             |
| 10/16/2013 11:12 0917-173 | No13_10_16_1112_15_162 | 1        | 0.01       | 1.162          | 0.090              | 0.080              | 0.761                    | 0.0820             | 0.479              | 1.773           | -1.760             | 0.188                 | -0.0000   | 0.0000                    | -0.59     | 0.353              | 25.069    |             |
| 10/16/2013 11:13 0917-173 | No13_10_16_1113_15_972 | 1        | 1.54       | 1.255          | -0.0800            | 0.080              | 0.814                    | 0.0830             | 0.509              | 1.777           | -1.955             | 0.197                 | -0.0010   | 0.0000                    | -1.11     | 0.385              | 26.142    |             |
| 10/16/2013 11:14 0917-173 | No13_10_16_1114_16_732 | 1        | -1.03      | 1.292          | 0.011              | 0.079              | 0.779                    | 0.0830             | 0.387              | 1.797           | -2.247             | 0.197                 | -0.0070   | 0.0000                    | 0.001     | 0.374              | 25.74     |             |
| 10/16/2013 11:15 0917-173 | No13_10_16_1115_17_532 | 1        | -0.75      | 1.141          | 0.081              | 0.078              | 0.774                    | 0.0830             | 0.576              | 1.760           | -1.716             | 0.190                 | -0.0010   | 0.0000                    | -0.71     | 0.380              | 27.012    |             |
| 10/16/2013 11:16 0917-173 | No13_10_16_1116_18_342 | 1        | 1.69       | 1.181          | -0.0710            | 0.076              | 0.779                    | 0.0830             | 0.409              | 1.783           | -1.994             | 0.187                 | -0.0070   | 0.0000                    | -0.73     | 0.358              | 25.096    |             |
| 10/16/2013 11:17 0917-173 | No13_10_16_1117_19_052 | 1        | -1.496     | 1.246          | 0.0640             | 0.074              | 0.666                    | 0.0810             | 0.511              | 1.786           | -1.629             | 0.180                 | -0.0070   | 0.0000                    | -0.78     | 0.376              | 23.413    |             |
| 10/16/2013 11:18 0917-173 | No13_10_16_1118_19_792 | 1        | -1.126     | 1.144          | -0.0510            | 0.080              | 0.844                    | 0.0810             | 0.520              | 1.777           | -1.923             | 0.182                 | -0.0010   | 0.0000                    | -0.87     | 0.365              | 23.212    |             |
| 10/16/2013 11:19 0917-173 | No13_10_16_1119_20_502 | 1        | -2.43      | 1.351          | 0.079              | 0.082              | 0.757                    | 0.0820             | 0.599              | 1.788           | -2.057             | 0.204                 | -0.0080   | 0.0000                    | -1.40     | 0.359              | 27.237    |             |
| 10/16/2013 11:20 0917-173 | No13_10_16_1120_21_332 | 1        | -0.83      | 1.204          | -0.1490            | 0.075              | 0.765                    | 0.0850             | 0.396              | 1.780           | -1.97              | 0.196                 | -0.0010   | 0.0000                    | -1.03     | 0.351              | 26.578    |             |
| 10/16/2013 11:21 0917-173 | No13_10_16_1121_22_052 | 1        | -1.908     | 1.280          | -0.103             | 0.080              | 0.695                    | 0.0840             | 0.534              | 1.791           | -2.204             | 0.205                 | -0.0070   | 0.0000                    | -0.69     | 0.393              | 27.01     |             |
| 10/16/2013 11:22 0917-173 | No13_10_16_1122_22_862 | 1        | 0.29       | 1.219          | 0.079              | 0.079              | 0.779                    | 0.0810             | 0.459              | 1.792           | -2.129             | 0.204                 | -0.0010   | 0.0000                    | -0.83     | 0.360              | 28.316    |             |
| 10/16/2013 11:23 0917-173 | No13_10_16_1123_23_562 | 1        | -2.31      | 1.249          | 0.028              | 0.079              | 0.857                    | 0.0840             | 0.460              | 1.798           | -2.103             | 0.202                 | -0.0070   | 0.0000                    | -0.53     | 0.376              | 26.368    |             |
| 10/16/2013 11:24 0917-173 | No13_10_16_1124_24_403 | 1        | 0.026      | 1.211          | -0.015             | 0.077              | 0.790                    | 0.0810             | 0.440              | 1.808           | -1.736             | 0.178                 | -0.0050   | 0.0000                    | -0.43     | 0.376              | 23.148    |             |
| 10/16/2013 11:25 0917-173 | No13_10_16_1125_25_123 | 1        | -1.26      | 1.185          | -0.116             | 0.081              | 0.703                    | 0.0810             | 0.509              | 1.788           | -2.084             | 0.190                 | -0.0050   | 0.0000                    | -0.85     | 0.355              | 25.226    |             |
| 10/16/2013 11:26 0917-173 | No13_10_16_1126_25_883 | 1        | -1.786     | 1.254          | -0.0460            | 0.081              | 0.724                    | 0.0780             | 0.508              | 1.798           | -2.115             | 0.213                 | -0.0010   | 0.0000                    | -0.45     | 0.382              | 29.298    |             |
| 10/16/2013 11:27 0917-173 | No13_10_16_1127_26_683 | 1        | -0.28      | 1.350          | -0.0750            | 0.087              | 0.727                    | 0.0860             | 0.648              | 1.807           | -2.78              | 0.255                 | -0.0090   | 0.0000                    | -0.91     | 0.387              | 36.09     |             |
| 10/16/2013 11:28 0917-173 | No13_10_16_1128_27_423 | 1        | -1.01      | 1.166          | -0.0620            | 0.088              | 0.824                    | 0.0830             | 0.399              | 1.803           | -3.003             | 0.266                 | -0.0040   | 0.0000                    | -0.491    | 0.355              | 38.123    |             |
| 10/16/2013 11:29 0917-173 | No13_10_16_1129_28_223 | 1        | -1.894     | 1.245          | -0.084             | 0.087              | 0.761                    | 0.0860             | 0.479              | 1.807           | -2.78              | 0.255                 | -0.0090   | 0.0000                    | -0.91     | 0.387              | 36.09     |             |
| 10/16/2013 11:30 0917-173 | No13_10_16_1130_28_963 | 1        | -3.270     | 1.282          | -0.001             | 0.094              | 0.796                    | 0.082              | 0.410              | 1.793           | -3.06              | 0.288                 | -0.0020   | 0.0000                    | -1.18     | 0.394              | 41.222    |             |
| 10/16/2013 11:31 0917-173 | No13_10_16_1131_29_793 | 1        | -0.95      | 1.181          | -0.0660            | 0.084              | 0.867                    | 0.0830             | 0.366              | 1.798           | -3.15              | 0.284                 | -0.0050   | 0.0000                    | -0.6      | 0.349              | 40.652    |             |
| 10/16/2013 11:32 0917-173 | No13_10_16_1132_30_513 | 1        | 1.20       | 1.353          | -0.041             | 0.094              | 0.847                    | 0.0850             | 0.383              | 1.797           | -3.089             | 0.289                 | -0.0040   | 0.0000                    | -0.22     | 0.401              | 40.986    |             |
| 10/16/2013 11:33 0917-173 | No13_10_16_1133_31_273 | 1        | -1.00      | 1.108          | -0.100             | 0.081              | 0.740                    | 0.0830             | 0.545              | 1.793           | -2.819             | 0.245                 | -0.0070   | 0.0000                    | -0.68     | 0.372              | 34.656    |             |
| 10/16/2013 11:34 0917-173 | No13_10_16_1134_32_083 | 1        | -0.490     | 1.280          | -0.044             | 0.083              | 0.836                    | 0.0810             | 0.448              | 1.802           | -2.505             | 0.227                 | -0.0070   | 0.0000                    | -0.83     | 0.387              | 30.811    |             |
| 10/16/2013 11:35 0917-173 | No13_10_16_1135_32_843 | 1        | -2.12      | 1.266          | -0.0090            | 0.081              | 0.877                    | 0.0850             | 0.322              | 1.807           | -2.40              | 0.231                 | -0.0030   | 0.0000                    | -0.46     |                    |           |             |

| Location                  | Disc.                   | #        | Start/Stop | Instrument     | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte     |           |                           |           |                    |           |              |
|---------------------------|-------------------------|----------|------------|----------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|------------------------|-----------|---------------------------|-----------|--------------------|-----------|--------------|
| Date                      | Method                  | Filename | OF         | Acroline (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | Proprionaldehyde (ppm) | SEC (ppm) | Sulfur_Hexafluoride (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/16/2013 13:09 0917-173 | 10,10,10,10,1309,43,601 | 1        | -0.40      | -0.0000        | -0.0000            | -0.0000            | -0.0000                  | -0.0000            | -0.0000            | -0.0000         | -0.0000                | -0.0000   | -0.0000                   | -0.0000   | -0.0000            | -0.0000   | -0.0000      |
| 10/16/2013 13:10 0917-173 | 10,10,10,10,1310,44,401 | 1        | -1.829     | 0.928          | -0.0000            | -0.0000            | -0.0000                  | -0.0000            | -0.0000            | -0.0000         | -0.0000                | -0.0000   | -0.0000                   | -0.0000   | -0.0000            | -0.0000   | -0.0000      |
| 10/16/2013 13:11 0917-173 | 10,10,10,10,1311,45,162 | 1        | -1.679     | 0.925          | -0.115             | 0.053              | 0.0070                   | 0.040              | -0.174             | 0.0620          | -0.424                 | 0.08      | -0.0000                   | -0.0000   | -0.265             | 0.728     | 1.121        |
| 10/16/2013 13:12 0917-173 | 10,10,10,10,1312,46,992 | 1        | -1.510     | 0.993          | -0.009             | 0.055              | 0.042                    | 0.090              | 0.105              | 0.467           | -0.709                 | 0.11      | 0.0000                    | 0.0000    | -0.74              | 0.291     | 9.917        |
| 10/16/2013 13:13 0917-173 | 10,10,10,10,1313,46,712 | 1        | -1.56      | 1.267          | -0.010             | 0.089              | 1.208                    | 0.090              | 0.136              | 1.872           | -2.941                 | 0.28      | -0.0000                   | 0.0000    | -0.5               | 0.373     | 42.161       |
| 10/16/2013 13:15 0917-173 | 10,10,10,10,1315,38,340 | 1        | -0.40      | 1.224          | -0.0800            | 0.094              | 1.249                    | 0.040              | 0.232              | 1.894           | -2.991                 | 0.28      | -0.0000                   | 0.0000    | -1.0               | 0.382     | 0.011        |
| 10/16/2013 13:16 0917-173 | 10,10,10,10,1316,39,150 | 1        | 0.291      | 1.207          | -0.026             | 0.088              | 1.133                    | 0.080              | 0.304              | 1.873           | -2.834                 | 0.25      | -0.0000                   | 0.0000    | -0.62              | 0.383     | 36.202       |
| 10/16/2013 13:17 0917-173 | 10,10,10,10,1317,39,420 | 1        | 0.36       | 1.135          | 0.034              | 0.077              | 1.075                    | 0.080              | 0.351              | 1.837           | -2.387                 | 0.3       | 0.0000                    | 0.0000    | -0.57              | 0.366     | 31.968       |
| 10/16/2013 13:19 0917-173 | 10,10,10,10,1319,00,620 | 1        | -0.147     | 1.276          | -0.010             | 0.078              | 0.935                    | 0.080              | 0.485              | 1.823           | -1.902                 | 0.21      | -0.0000                   | 0.0000    | -0.65              | 0.382     | 28.537       |
| 10/16/2013 13:20 0917-173 | 10,10,10,10,1320,01,430 | 1        | -0.74      | 1.264          | -0.004             | 0.076              | 0.882                    | 0.080              | 0.475              | 1.804           | -1.813                 | 0.21      | -0.0000                   | 0.0000    | -1.19              | 0.361     | 27.587       |
| 10/16/2013 13:21 0917-173 | 10,10,10,10,1321,02,140 | 1        | 0.01       | 1.176          | 0.006              | 0.082              | 0.885                    | 0.080              | 0.365              | 1.804           | -2.208                 | 0.22      | -0.0000                   | 0.0000    | -0.55              | 0.359     | 31.255       |
| 10/16/2013 13:22 0917-173 | 10,10,10,10,1322,02,770 | 1        | -1.14      | 1.296          | 0.030              | 0.076              | 1.063                    | 0.080              | 0.431              | 1.807           | -1.87                  | 0.21      | -0.0000                   | 0.0000    | -0.85              | 0.368     | 27.822       |
| 10/16/2013 13:23 0917-173 | 10,10,10,10,1323,04,590 | 1        | -0.24      | 1.187          | -0.040             | 0.076              | 0.833                    | 0.080              | 0.478              | 1.811           | -1.72                  | 0.19      | -0.0000                   | 0.0000    | -1.05              | 0.350     | 25.9         |
| 10/16/2013 13:24 0917-173 | 10,10,10,10,1324,05,290 | 1        | -1.11      | 1.241          | -0.038             | 0.082              | 0.967                    | 0.070              | 0.454              | 1.817           | -2.260                 | 0.24      | -0.0000                   | 0.0000    | -0.68              | 0.385     | 32.991       |
| 10/16/2013 13:25 0917-173 | 10,10,10,10,1325,05,140 | 1        | -2.66      | 1.211          | -0.070             | 0.087              | 1.053                    | 0.080              | 0.254              | 1.824           | -2.79                  | 0.16      | -0.0000                   | 0.0000    | -1.19              | 0.364     | 38.244       |
| 10/16/2013 13:26 0917-173 | 10,10,10,10,1326,06,890 | 1        | -0.347     | 1.267          | -0.127             | 0.090              | 1.117                    | 0.090              | 0.252              | 1.834           | -3.165                 | 0.28      | -0.0000                   | 0.0000    | -0.58              | 0.371     | 40.046       |
| 10/16/2013 13:27 0917-173 | 10,10,10,10,1327,07,651 | 1        | 0.39       | 1.333          | 0.020              | 0.087              | 1.129                    | 0.090              | 0.447              | 1.836           | -2.70                  | 0.26      | -0.0000                   | 0.0000    | -0.80              | 0.386     | 38.064       |
| 10/16/2013 13:28 0917-173 | 10,10,10,10,1328,08,371 | 1        | 0.30       | 1.339          | 0.029              | 0.091              | 1.179                    | 0.090              | 0.344              | 1.856           | -2.528                 | 0.26      | -0.0000                   | 0.0000    | -0.76              | 0.390     | 37.73        |
| 10/16/2013 13:29 0917-173 | 10,10,10,10,1329,09,101 | 1        | 0.52       | 1.319          | 0.0160             | 0.088              | 1.047                    | 0.090              | 0.502              | 1.881           | -2.340                 | 0.25      | -0.0000                   | 0.0000    | -0.80              | 0.396     | 35.201       |
| 10/16/2013 13:30 0917-173 | 10,10,10,10,1330,09,901 | 1        | 0.01       | 1.291          | -0.040             | 0.091              | 1.069                    | 0.090              | 0.388              | 1.899           | -2.582                 | 0.26      | -0.0000                   | 0.0000    | -0.91              | 0.388     | 37.404       |
| 10/16/2013 13:31 0917-173 | 10,10,10,10,1331,10,691 | 1        | -1.71      | 1.310          | -0.002             | 0.095              | 1.036                    | 0.090              | 0.333              | 1.903           | -2.54                  | 0.26      | -0.0000                   | 0.0000    | -0.99              | 0.403     | 36.776       |
| 10/16/2013 13:32 0917-173 | 10,10,10,10,1332,10,16  | 1        | -0.42      | 1.252          | -0.040             | 0.091              | 1.085                    | 0.090              | 0.508              | 1.913           | -2.63                  | 0.26      | -0.0000                   | 0.0000    | -0.97              | 0.384     | 38.527       |
| 10/16/2013 13:33 0917-173 | 10,10,10,10,1333,11,151 | 1        | -0.58      | 1.406          | -0.1290            | 0.091              | 1.037                    | 0.090              | 0.095              | 1.905           | -2.704                 | 0.27      | -0.0000                   | 0.0000    | -0.99              | 0.401     | 39.225       |
| 10/16/2013 13:34 0917-173 | 10,10,10,10,1334,12,951 | 1        | -0.547     | 1.299          | -0.037             | 0.093              | 1.065                    | 0.090              | 0.241              | 1.896           | -2.839                 | 0.28      | -0.0000                   | 0.0000    | -0.62              | 0.378     | 41.092       |
| 10/16/2013 13:35 0917-173 | 10,10,10,10,1335,13,701 | 1        | -1.85      | 1.296          | -0.03900           | 0.094              | 1.143                    | 0.090              | 0.322              | 1.880           | -2.705                 | 0.28      | -0.0000                   | 0.0000    | -0.3               | 0.387     | 40.874       |
| 10/16/2013 13:36 0917-173 | 10,10,10,10,1336,14,461 | 1        | -0.40      | 1.250          | -0.034             | 0.094              | 1.056                    | 0.090              | 0.226              | 1.874           | -2.679                 | 0.28      | -0.0000                   | 0.0000    | -0.38              | 0.392     | 42.222       |
| 10/16/2013 13:37 0917-173 | 10,10,10,10,1337,15,271 | 1        | -1.268     | 1.281          | -0.027             | 0.093              | 1.151                    | 0.090              | 0.236              | 1.879           | -2.66                  | 0.28      | -0.0000                   | 0.0000    | -1.02              | 0.388     | 40.723       |
| 10/16/2013 13:38 0917-173 | 10,10,10,10,1338,15,941 | 1        | -0.02      | 1.275          | -0.12400           | 0.095              | 1.214                    | 0.090              | 0.279              | 1.882           | -2.987                 | 0.29      | -0.0000                   | 0.0000    | -0.4               | 0.389     | 42.538       |
| 10/16/2013 13:39 0917-173 | 10,10,10,10,1339,16,752 | 1        | 1.84       | 1.217          | -0.219             | 0.091              | 1.082                    | 0.090              | 0.421              | 1.858           | -2.85                  | 0.27      | -0.0000                   | 0.0000    | -0.85              | 0.371     | 38.586       |
| 10/16/2013 13:40 0917-173 | 10,10,10,10,1340,17,442 | 1        | 0.266      | 1.296          | -0.087             | 0.094              | 1.081                    | 0.090              | 0.427              | 1.858           | -2.59                  | 0.28      | -0.0000                   | 0.0000    | -0.98              | 0.398     | 34.956       |
| 10/16/2013 13:41 0917-173 | 10,10,10,10,1341,18,272 | 1        | -2.10      | 1.278          | -0.035             | 0.085              | 0.993                    | 0.090              | 0.256              | 1.861           | -2.13                  | 0.24      | -0.0000                   | 0.0000    | -0.95              | 0.386     | 33.874       |
| 10/16/2013 13:42 0917-173 | 10,10,10,10,1342,18,982 | 1        | -0.79      | 1.258          | -0.054             | 0.086              | 0.937                    | 0.090              | 0.354              | 1.846           | -2.095                 | 0.23      | -0.0000                   | 0.0000    | -1.25              | 0.375     | 31.219       |
| 10/16/2013 13:43 0917-173 | 10,10,10,10,1343,19,760 | 1        | 0.13       | 1.279          | -0.057             | 0.089              | 0.985                    | 0.090              | 0.317              | 1.848           | -2.14                  | 0.21      | -0.0000                   | 0.0000    | -0.69              | 0.370     | 28.147       |
| 10/16/2013 13:44 0917-173 | 10,10,10,10,1344,20,512 | 1        | -2.384     | 1.223          | -0.055             | 0.080              | 0.823                    | 0.080              | 0.351              | 1.837           | -1.653                 | 0.20      | -0.0000                   | 0.0000    | -0.41              | 0.389     | 26.095       |
| 10/16/2013 13:45 0917-173 | 10,10,10,10,1345,21,252 | 1        | -0.416     | 1.168          | -0.004             | 0.078              | 0.871                    | 0.090              | 0.332              | 1.861           | -1.278                 | 0.18      | -0.0000                   | 0.0000    | -1.12              | 0.367     | 23.605       |
| 10/16/2013 13:46 0917-173 | 10,10,10,10,1346,22,032 | 1        | 0.33       | 1.241          | 0.037              | 0.081              | 0.887                    | 0.090              | 0.281              | 1.880           | -1.372                 | 0.18      | -0.0000                   | 0.0000    | -0.45              | 0.381     | 22.504       |
| 10/16/2013 13:47 0917-173 | 10,10,10,10,1347,22,792 | 1        | 1.147      | 1.187          | 0.047              | 0.077              | 0.937                    | 0.090              | 0.466              | 1.900           | -1.47                  | 0.18      | -0.0000                   | 0.0000    | -1.28              | 0.388     | 22.955       |
| 10/16/2013 13:48 0917-173 | 10,10,10,10,1348,23,542 | 1        | 0.860      | 1.294          | 0.012              | 0.077              | 1.017                    | 0.090              | 0.461              | 1.918           | -1.32                  | 0.19      | -0.0000                   | 0.0000    | -0.84              | 0.382     | 23.762       |
| 10/16/2013 13:49 0917-173 | 10,10,10,10,1349,24,252 | 1        | -0.11      | 1.302          | 0.044              | 0.078              | 0.958                    | 0.090              | 0.311              | 1.923           | -1.369                 | 0.19      | -0.0000                   | 0.0000    | -0.37              | 0.392     | 24.06        |
| 10/16/2013 13:50 0917-173 | 10,10,10,10,1350,25,052 | 1        | 0.71       | 1.343          | 0.096              | 0.077              | 1.008                    | 0.090              | 0.389              | 1.924           | -1.69                  | 0.20      | -0.0000                   | 0.0000    | -0.401             | 0.395     | 26.256       |
| 10/16/2013 13:51 0917-173 | 10,10,10,10,1351,26,803 | 1        | -1.99      | 1.296          | 0.115              | 0.078              | 0.955                    | 0.090              | 0.350              | 1.928           | -1.37                  | 0.19      | -0.0000                   | 0.0000    | -1.02              | 0.374     | 30.308       |
| 10/16/2013 13:52 0917-173 | 10,10,10,10,1352,26,603 | 1        | -1.58      | 1.257          | -0.0270            | 0.084              | 0.904                    | 0.090              | 0.438              | 1.904           | -1.476                 | 0.20      | -0.0000                   | 0.0000    | -0.66              | 0.388     | 25.324       |
| 10/16/2013 13:53 0917-173 | 10,10,10,10,1353,27,313 | 1        | -0.097     | 1.338          | 0.0580             | 0.079              | 1.006                    | 0.090              | 0.324              | 1.905           | -1.446                 | 0.19      | -0.0000                   | 0.0000    | -0.17              | 0.383     | 23.588       |
| 10/16/2013 13:54 0917-173 | 10,10,10,10,1354,28,013 | 1        | 0.40       | 1.487          | -0.014             | 0.081              | 1.014                    | 0.090              | 0.226              | 1.874           | -1.12                  | 0.19      | -0.0000                   | 0.0000    | -1.09              | 0.392     | 22.729       |
| 10/16/2013 13:55 0917-173 | 10,10,10,10,1355,28,823 | 1        | -0.61      | 1.348          | -0.03300           | 0.075              | 0.986                    | 0.090              | 0.389              | 1.903           | -1.378                 | 0.18      | -0.0000                   | 0.0000    | -0.67              | 0.390     | 22.796       |
| 10/16/2013 13:56 0917-173 | 10,10,10,10,1356,29,593 | 1        | -0.28      | 1.254          | -0.0160            | 0.079              | 1.039                    | 0.090              | 0.526              | 1.911           | -1.358                 | 0.18      | -0.0000                   | 0.0000    | -0.46              | 0.382     | 23.132       |
| 10/16/2013 13:57 0917-173 | 10,10,10,10,1357,30,303 | 1        | 0.98       | 1.231          | -0.051             | 0.081              | 0.981                    | 0.090              | 0.508              | 1.932           | -1.436                 | 0.19      | -0.0000                   | 0.0000    | -0.44              | 0.383     | 24.453       |
| 10/16/2013 13:58 0917-173 | 10,10,10,10,1358,31,053 | 1        | 0.598      | 1.255          | -0.0060            | 0.079              | 1.095                    | 0.090              | 0.380              | 1.935           | -1.530                 | 0.19      | -0.0000                   | 0.0000    | -0.17              | 0.383     | 24.549       |
| 10/16/2013 13:59 0917-173 | 10,10,10,10,1359,31,863 | 1        | -1.99      | 1.436          | 0.067              | 0.079              | 1.002                    | 0.090              | 0.668              | 1.923           | -1.384                 | 0.19      | -0.0000                   | 0.0000    | -0.53              | 0.409     | 23.863       |
| 10/16/2013 14:00 0917-173 | 10,10,10,10,1400,32,603 | 1        | 0.05       | 1.352          | 0.085              | 0.081              | 0.877                    | 0.090              | 0.463              | 1.910           | -1.125                 | 0.18      | -0.0000                   | 0.0000    | -0.62              | 0.405     | 21.413       |
| 10/16/2013 14:01 0917-173 | 10,10,10,10,1401,33,133 | 1        | 0.54       | 1.304          | 0.054              | 0.081              | 0.935                    | 0.090              | 0.452              | 1.883           | -1.16                  | 0.18      | -0.0000                   | 0.0000    | -0.64              | 0.388     | 21.132       |
| 10/16/2013 14:02 0917-173 | 10,10,10,10,1402,34,073 | 1        | 2.17       | 1.300          | 0.042              | 0.084              | 0.936                    | 0.090              | 0.543              | 1.867           | -1.737                 | 0.18      | -0.0000                   | 0.0000    | -0.11              | 0.388     | 25.815       |
| 10/16/2013 14:03 0917-173 | 10,10,10,10,1403,34,794 | 1        | 0.96       | 1.227          | 0.047              | 0.076              | 1.003                    | 0.090              | 0.420              | 1.862           | -1.638                 | 0.204     | -0.0000                   | 0.0000    | -0.53              | 0.352     | 27.05        |
| 10/16/2013 14:04 0917-173 | 10,10,10,10,1404,35,484 | 1        | 0.73       | 1.190          | 0.0210             | 0.084              | 0.972                    | 0.080              | 0.478              | 1.855           | -1.730                 | 0.213     | -0.0000                   | 0.0000    | -1.11              | 0.359     | 28.284       |
| 10/16/2013 14:05 0917-173 | 10,10,10,10,1405,36,184 | 1        | 0.93       | 1.241          | 0.053              | 0.081              | 0.938                    | 0.090              | 0.480              | 1.852           | -1.729                 | 0.21      | -0.0000                   | 0.0000    | -1.04              | 0.386     | 28.656       |
| 10/16/2013 14:06 0917-173 | 10,10,10,10,1           |          |            |                |                    |                    |                          |                    |                    |                 |                        |           |                           |           |                    |           |              |

| Location                  | Disc.                  | #        | Start/Stop | Instrument     | Label<br>1-Analyte | Label<br>2-Analyte | Label<br>3-Analyte/Spike | Label<br>4-Analyte | Label<br>5-Analyte | Label<br>Tracer | Label<br>6-Analyte |                       |           |                           |           |                    |           |              |
|---------------------------|------------------------|----------|------------|----------------|--------------------|--------------------|--------------------------|--------------------|--------------------|-----------------|--------------------|-----------------------|-----------|---------------------------|-----------|--------------------|-----------|--------------|
| Date                      | Method                 | Filename | OF         | Acrolein (ppm) | SEC (ppm)          | Formaldehyde (ppm) | SEC (ppm)                | Methanol (ppm)     | SEC (ppm)          | Phenol (ppm)    | SEC (ppm)          | Propionaldehyde (ppm) | SEC (ppm) | Sulfur_hexafluoride (ppm) | SEC (ppm) | acetaldehyde (ppm) | SEC (ppm) | pinene (ppm) |
| 10/16/2013 15:30 0917-173 | No13_10_16_1530_56_551 | 1        | 5.788      | 2.610          | 0.082              | 0.161              | 0.0330                   | 0.1190             | 0.988              | 2.031           | 0.233              | 0.250                 | 0.01000   | 0.00000                   | 6.00      | 0.80               | 0.308     |              |
| 10/16/2013 15:31 0917-173 | No13_10_16_1531_02_751 | 1        | -5.160     | 2.791          | 0.141              | 0.138              | -0.1000                  | 0.1230             | 0.763              | 2.021           | 0.146              | 0.237                 | -0.01600  | 0.00000                   | 1.34      | 0.779              | 0.292     |              |
| 10/16/2013 15:31 0917-173 | No13_10_16_1531_08_851 | 1        | 1.033      | 2.904          | -0.0470            | 0.156              | -0.0230                  | 0.0240             | 0.699              | 1.992           | -0.014             | 0.258                 | -0.03100  | 0.00000                   | -0.963    | 0.85               | 0.269     |              |
| 10/16/2013 15:31 0917-173 | No13_10_16_1531_15_041 | 1        | 2.170      | 2.898          | -0.1870            | 0.150              | -0.06000                 | 0.1230             | 0.972              | 1.989           | -0.145             | 0.253                 | 0.00700   | 0.00700                   | -0.707    | 0.86               | 0.315     |              |
| 10/16/2013 15:31 0917-173 | No13_10_16_1531_21_201 | 1        | 4.514      | 2.771          | -0.1720            | 0.151              | -0.084                   | 0.125              | 0.895              | 1.975           | -0.368             | 0.243                 | -0.00600  | 0.00000                   | 1.444     | 0.83               | 0.235     |              |
| 10/16/2013 15:31 0917-173 | No13_10_16_1531_27_441 | 1        | -0.117     | 2.740          | 0.136              | 0.155              | -0.0040                  | 0.119              | 1.212              | 2.006           | -0.276             | 0.251                 | -0.01000  | 0.00000                   | 0.45      | 0.82               | 0.249     |              |
| 10/16/2013 15:31 0917-173 | No13_10_16_1531_33_631 | 1        | 3.6860     | 2.862          | -0.270             | 0.147              | 0.1540                   | 0.1140             | 1.3550             | 1.986           | 0.04               | 0.247                 | -0.00300  | 0.00000                   | -0.60     | 0.85               | 0.236     |              |
| 10/16/2013 15:31 0917-173 | No13_10_16_1531_39_721 | 1        | 5.219      | 2.855          | -0.03              | 0.153              | -0.0290                  | 0.128              | 1.080              | 1.954           | -0.188             | 0.252                 | 0.01400   | 0.00000                   | 0.275     | 0.83               | 0.233     |              |
| 10/16/2013 15:31 0917-173 | No13_10_16_1531_45_921 | 1        | -1.45      | 2.667          | -0.286             | 0.156              | -0.156                   | 0.1900             | 0.586              | 1.923           | -0.333             | 0.247                 | -0.0020   | 0.00000                   | 0.437     | 0.79               | 0.284     |              |
| 10/16/2013 15:31 0917-173 | No13_10_16_1531_52_121 | 1        | 4.183      | 2.889          | 0.111              | 0.154              | -0.060                   | 0.1210             | 0.808              | 1.940           | -0.151             | 0.256                 | -0.01300  | 0.00000                   | 1.35      | 0.84               | 0.235     |              |
| 10/16/2013 15:31 0917-173 | No13_10_16_1531_58_311 | 1        | 3.191      | 2.337          | -0.131             | 0.146              | 0.146                    | 0.1190             | 0.914              | 1.891           | -0.548             | 0.228                 | 0.00700   | 0.00000                   | -0.07     | 0.75               | 0.247     |              |
| 10/16/2013 15:32 0917-173 | No13_10_16_1532_04_511 | 1        | 8.322      | 3.074          | 0.192              | 0.145              | -0.177                   | 0.113              | 1.0010             | 1.887           | -0.160             | 0.252                 | -0.00900  | 0.00700                   | 0.786     | 0.86               | 0.267     |              |
| 10/16/2013 15:32 0917-173 | No13_10_16_1532_10_611 | 1        | -1.006     | 2.742          | 0.2000             | 0.153              | 0.183                    | 0.1550             | 0.767              | 1.913           | 0.310              | 0.250                 | -0.02000  | 0.00000                   | -2.35     | 0.85               | 0.225     |              |
| 10/16/2013 15:32 0917-173 | No13_10_16_1532_16_801 | 1        | -0.033     | 2.753          | -0.133             | 0.145              | 0.0110                   | 0.1190             | 0.996              | 1.869           | -0.115             | 0.244                 | -0.01400  | 0.00000                   | -0.150    | 0.83               | 0.213     |              |
| 10/16/2013 15:32 0917-173 | No13_10_16_1532_23_091 | 1        | 0.267      | 2.910          | 0.040              | 0.140              | 0.032                    | 0.1170             | 0.971              | 1.872           | -0.070             | 0.253                 | 0.00200   | 0.00000                   | -0.11     | 0.86               | 0.238     |              |
| 10/16/2013 15:32 0917-173 | No13_10_16_1532_29_201 | 1        | -2.487     | 2.930          | 0.168              | 0.155              | -0.204                   | 0.1200             | 0.996              | 1.897           | -0.250             | 0.261                 | -0.00600  | 0.00000                   | 1.129     | 0.86               | 0.229     |              |
| 10/16/2013 15:32 0917-173 | No13_10_16_1532_35_501 | 1        | -0.039     | 2.664          | 0.083              | 0.153              | -0.133                   | 0.115              | 1.187              | 1.845           | -0.490             | 0.247                 | -0.00300  | 0.00000                   | 1.100     | 0.80               | 0.218     |              |
| 10/16/2013 15:32 0917-173 | No13_10_16_1532_41_501 | 1        | 2.647      | 2.916          | -0.1070            | 0.139              | -0.169                   | 0.1180             | 0.351              | 1.861           | 0.001              | 0.241                 | -0.01500  | 0.00000                   | 0.85      | 0.82               | 0.226     |              |
| 10/16/2013 15:32 0917-173 | No13_10_16_1532_47_091 | 1        | 0.0860     | 2.907          | 0.0930             | 0.147              | 0.265                    | 0.1130             | 1.061              | 1.807           | -0.466             | 0.247                 | -0.00900  | 0.00000                   | 0.62      | 0.82               | 0.248     |              |
| 10/16/2013 15:32 0917-173 | No13_10_16_1532_53_981 | 1        | -4.093     | 3.058          | 0.1680             | 0.145              | 0.1770                   | 0.1200             | 0.948              | 1.877           | -0.154             | 0.251                 | 0.00500   | 0.00000                   | 0.16      | 0.88               | 0.259     |              |
| 10/16/2013 15:33 0917-173 | No13_10_16_1533_00_181 | 1        | 2.293      | 2.956          | 0.002              | 0.154              | 0.260                    | 0.1110             | 0.806              | 1.824           | -0.036             | 0.253                 | 0.00700   | 0.00000                   | 0.440     | 0.85               | 0.252     |              |
| 10/16/2013 15:33 0917-173 | No13_10_16_1533_06_381 | 1        | 8.35       | 2.835          | -0.425             | 0.153              | 0.1520                   | 0.1080             | 1.078              | 1.834           | -1.273             | 0.245                 | -0.00900  | 0.00000                   | 1.64      | 0.77               | 0.195     |              |
| 10/16/2013 15:33 0917-173 | No13_10_16_1533_12_481 | 1        | 5.04       | 2.582          | 0.247              | 0.156              | 0.271                    | 0.1170             | 0.873              | 1.816           | -0.105             | 0.249                 | -0.00900  | 0.00000                   | 1.79      | 0.82               | 0.264     |              |
| 10/16/2013 15:33 0917-173 | No13_10_16_1533_18_681 | 1        | -5.211     | 2.672          | 0.17               | 0.152              | 0.250                    | 0.1170             | 0.871              | 1.802           | -0.030             | 0.248                 | -0.00400  | 0.00000                   | 0.627     | 0.82               | 0.22      |              |
| 10/16/2013 15:33 0917-173 | No13_10_16_1533_24_881 | 1        | -2.849     | 2.862          | 0.421              | 0.151              | -0.0160                  | 0.1100             | 0.646              | 1.878           | -0.324             | 0.250                 | -0.01700  | 0.00000                   | -0.3320   | 0.84               | 0.192     |              |
| 10/16/2013 15:33 0917-173 | No13_10_16_1533_30_081 | 1        | 6.036      | 2.833          | 0.5100             | 0.156              | -0.278                   | 0.129              | 0.886              | 1.993           | -0.287             | 0.256                 | -0.00300  | 0.00000                   | -0.907    | 0.85               | 0.252     |              |
| 10/16/2013 15:33 0917-173 | No13_10_16_1533_37_271 | 1        | -7.940     | 2.988          | 0.187              | 0.166              | -0.211                   | 0.143              | 0.25               | 1.707           | -0.222             | 0.272                 | -0.01200  | 0.00000                   | 0.1800    | 0.91               | 0.088     |              |
| 10/16/2013 15:33 0917-173 | No13_10_16_1533_43_371 | 1        | -6.836     | 3.097          | -0.097             | 0.160              | -0.376                   | 0.155              | 0.994              | 1.624           | -0.556             | 0.270                 | -0.00300  | 0.00000                   | 0.53      | 0.876              | 0.056     |              |
| 10/16/2013 15:33 0917-173 | No13_10_16_1533_49_561 | 1        | -1.62      | 3.145          | -0.072             | 0.177              | -0.270                   | 0.153              | 1.133              | 1.615           | -0.562             | 0.293                 | -0.01300  | 0.00700                   | -0.08     | 0.99               | -0.092    |              |
| 10/16/2013 15:33 0917-173 | No13_10_16_1534_05_761 | 1        | 1.765      | 2.989          | 0.0490             | 0.189              | -0.038                   | 0.149              | 0.954              | 1.549           | 0.100              | 0.297                 | -0.02800  | 0.00000                   | -1.40     | 0.94               | -0.058    |              |
| 10/16/2013 15:34 0917-173 | No13_10_16_1534_05_961 | 1        | -4.91      | 3.287          | -0.133             | 0.178              | -0.397                   | 0.144              | 1.814              | 1.610           | -0.069             | 0.294                 | -0.02300  | 0.00000                   | -0.766    | 0.99               | -0.04     |              |
| 10/16/2013 15:34 0917-173 | No13_10_16_1534_06_091 | 1        | -1.8580    | 3.298          | 0.164              | 0.182              | -0.2440                  | 0.143              | 1.457              | 1.709           | 0.3400             | 0.296                 | -0.01100  | 0.00000                   | 0.112     | 0.99               | 0.038     |              |
| 10/16/2013 15:34 0917-173 | No13_10_16_1534_12_241 | 1        | -2.112     | 3.301          | -0.131             | 0.179              | -0.1650                  | 0.142              | 1.169              | 1.641           | -0.322             | 0.296                 | -0.01900  | 0.00000                   | -0.15     | 0.99               | 0.115     |              |
| 10/16/2013 15:34 0917-173 | No13_10_16_1534_20_441 | 1        | -4.684     | 3.205          | -0.08              | 0.181              | -0.183                   | 0.139              | 0.705              | 1.670           | 0.051              | 0.296                 | -0.00900  | 0.00000                   | -0.16     | 0.96               | 0.009     |              |
| 10/16/2013 15:34 0917-173 | No13_10_16_1534_26_631 | 1        | 5.6610     | 3.152          | 0.0630             | 0.180              | -0.239                   | 0.145              | 1.042              | 1.738           | 0.087              | 0.288                 | -0.01000  | 0.00700                   | -1.063    | 0.97               | 0.056     |              |
| 10/16/2013 15:34 0917-173 | No13_10_16_1534_32_831 | 1        | -0.622     | 3.414          | 0.181              | 0.166              | -0.002                   | 0.152              | 0.389              | 1.726           | -0.143             | 0.284                 | -0.00900  | 0.00700                   | -0.671    | 0.97               | 0.107     |              |
| 10/16/2013 15:34 0917-173 | No13_10_16_1534_38_921 | 1        | -1.15      | 3.230          | 0.464              | 0.181              | -0.1010                  | 0.147              | 0.821              | 1.744           | 0.022              | 0.287                 | -0.02     | 0.00000                   | -2.35     | 0.99               | 0.158     |              |
| 10/16/2013 15:34 0917-173 | No13_10_16_1534_45_121 | 1        | -5.521     | 3.193          | 0.0950             | 0.173              | -0.226                   | 0.145              | 0.22               | 1.795           | 0.16               | 0.288                 | -0.00300  | 0.00700                   | -1.198    | 0.93               | 0.12      |              |
| 10/16/2013 15:34 0917-173 | No13_10_16_1534_51_321 | 1        | -2.466     | 3.090          | -0.38              | 0.175              | -0.140                   | 0.142              | 0.836              | 1.800           | -0.45              | 0.280                 | -0.03900  | 0.00000                   | 0.770     | 0.92               | 0.83      |              |
| 10/16/2013 15:34 0917-173 | No13_10_16_1534_57_511 | 1        | -1.147     | 2.792          | -0.149             | 0.173              | -0.312                   | 0.143              | 0.741              | 1.841           | -0.328             | 0.270                 | -0.00400  | 0.00700                   | -0.04     | 0.89               | 0.207     |              |
| 10/16/2013 15:35 0917-173 | No13_10_16_1535_03_811 | 1        | -1.870     | 3.042          | 0.165              | 0.160              | 0.021                    | 0.1400             | 0.858              | 1.908           | 0.0130             | 0.269                 | 0.00500   | 0.00700                   | 1.32      | 0.90               | 0.223     |              |
| 10/16/2013 15:35 0917-173 | No13_10_16_1535_09_821 | 1        | 0.57       | 3.108          | 0.078              | 0.166              | -0.128                   | 0.151              | 0.763              | 1.905           | -0.26              | 0.274                 | -0.00400  | 0.00600                   | -2.269    | 0.90               | 0.238     |              |
| 10/16/2013 15:35 0917-173 | No13_10_16_1535_16_021 | 1        | -2.21      | 3.049          | 0.0020             | 0.171              | -0.020                   | 0.139              | 0.777              | 1.933           | 0.023              | 0.276                 | -0.01900  | 0.00700                   | -0.98     | 0.92               | 0.251     |              |
| 10/16/2013 15:35 0917-173 | No13_10_16_1535_22_221 | 1        | -1.4640    | 2.960          | 0.063              | 0.161              | -0.308                   | 0.145              | 0.791              | 1.921           | -0.011             | 0.265                 | -0.01100  | 0.00700                   | 0.58      | 0.89               | 0.257     |              |
| 10/16/2013 15:35 0917-173 | No13_10_16_1535_28_421 | 1        | -3.878     | 2.646          | 0.137              | 0.164              | -0.239                   | 0.146              | 0.19               | 1.958           | -0.1220            | 0.258                 | -0.02000  | 0.00700                   | -0.81     | 0.85               | 0.26      |              |
| 10/16/2013 15:35 0917-173 | No13_10_16_1535_34_611 | 1        | -5.654     | 2.773          | -0.61              | 0.166              | -0.04800                 | 0.1480             | 0.960              | 1.959           | -0.724             | 0.265                 | -0.00300  | 0.00700                   | 1.21      | 0.89               | 0.311     |              |
| 10/16/2013 15:35 0917-173 | No13_10_16_1535_40_711 | 1        | -0.165     | 2.984          | -0.146             | 0.165              | -0.1460                  | 0.140              | 0.954              | 1.940           | -0.0110            | 0.260                 | -0.01100  | 0.00000                   | -0.173    | 0.90               | 0.264     |              |
| 10/16/2013 15:35 0917-173 | No13_10_16_1535_46_901 | 1        | -5.840     | 3.155          | -0.31              | 0.156              | -0.2000                  | 0.137              | 0.752              | 1.970           | -0.668             | 0.266                 | -0.02300  | 0.00000                   | 1.65      | 0.88               | 0.288     |              |
| 10/16/2013 15:35 0917-173 | No13_10_16_1535_53_101 | 1        | -0.37      | 3.335          | 0.228              | 0.180              | -0.0260                  | 0.147              | 0.751              | 1.994           | -0.177             | 0.294                 | 0.00400   | 0.00700                   | -0.267    | 0.97               | 0.281     |              |
| 10/16/2013 15:35 0917-173 | No13_10_16_1535_59_391 | 1        | -0.96      | 2.796          | 0.131              | 0.167              | -0.0410                  | 0.137              | 0.747              | 2.045           | -0.060             | 0.267                 | -0.01200  | 0.00700                   | -0.003    | 0.87               | 0.279     |              |
| 10/16/2013 15:36 0917-173 | No13_10_16_1536_05_581 | 1        | -2.34      | 3.066          | 0.128              | 0.166              | -0.0200                  | 0.138              | 0.23               | 1.984           | 0.163              | 0.271                 | -0.01100  | 0.00700                   | 0.338     | 0.82               | 0.259     |              |
| 10/16/2013 15:36 0917-173 | No13_10_16_1536_11_081 | 1        | 2.785      | 2.952          | -0.002             | 0.151              | -0.06700                 | 0.146              | 0.515              | 2.036           | -0.236             | 0.253                 | -0.02500  | 0.00700                   | -0.05     | 0.86               | 0.25      |              |
| 10/16/2013 15:36 0917-173 | No13_10_16_1536_17_881 | 1        | -1.868     | 3.156          | 0.311              | 0.155              | -0.213                   | 0.149              | 0.835              | 1.986           | -0.355             | 0.261                 | -0.01300  | 0.00600                   | -0.830    | 0.89               | 0.27      |              |
| 10/16/2013 15:36 0917-173 | No13_10_16_1536_24_081 | 1        | -7.7500    | 3.032          | -0.150             | 0.168              | -0.126                   | 0.140              | 0.697              | 2.043           | -0.408             | 0.272                 | -0.02400  | 0.00600                   | 0.30      | 0.91               | 0.313     |              |
| 10/16/2013 15:36 0917-173 | No13_10_16_1536_30_271 | 1        | 5.153      | 2.984          | 0.065              | 0.162              | 0.056                    | 0.140              | 0.687              | 1.981           | 0.025              | 0.265                 | -0.02900  | 0.00600                   | -0.92     | 0.86               | 0.268     |              |







[illegible]

























172















179

180





| Location | Disc  | #  | Inst | Start row | stop row |
|----------|-------|----|------|-----------|----------|
| Data     | CYL   | 1  | A    | 43        | 49       |
| Data     | SPK   | 1  | A    | 91        | 97       |
| Data     | UNSPK | 1  | A    | 103       | 109      |
| Data     | Run   | 1  | A    | 145       | 205      |
| Data     | Run   | 2  | A    | 238       | 296      |
| Data     | Run   | 3  | A    | 305       | 364      |
| Data     | MDC   | 1  |      | 506       | 512      |
| Data     | Run   | 4  | A    | 538       | 597      |
| Data     | Run   | 5  | A    | 608       | 667      |
| Data     | Run   | 6  | A    | 685       | 743      |
| Data     | Run   | 13 | A    | 781       | 840      |
| Data     | Run   | 7  | A    | 971       | 1030     |
| Data     | Run   | 8  | A    | 1043      | 1102     |
| Data     | Run   | 9  | A    | 1113      | 1173     |
| Data     | Run   | 10 | A    | 1362      | 1422     |
| Data     | Run   | 11 | A    | 1435      | 1494     |
| Data     | Run   | 12 | A    | 1506      | 1564     |

## **APPENDIX D**

### **Method 320 Log Sheet**

## FTIR Log - Enviva Amory

| Date   | Time      | Filename              | Method    | Pressure | Notes                                            | Run ID |
|--------|-----------|-----------------------|-----------|----------|--------------------------------------------------|--------|
| 14-Oct | 1207      | 13.10.14.1207.07.590  | CTS       | 14.62    | Background                                       | 1      |
|        | 1214      | 13.10.14.1214.07.635  | CTS       | 14.75    | CTS (pathlength = 8.693 m)                       |        |
|        | 1237      | 13.10.14.1237.34.593  | 0913-177A | 14.61    | Background                                       |        |
|        | 1244      | 13.10.14.1244.42.467  | 0913-177A | 14.74    | Methanol Direct (Response = 102.3 ppm/ 2.86 ppm) |        |
|        | 1345-1400 | 13.10.14.1313.07.480  | 0913-177A | 12.48    | Methanol Spike                                   |        |
|        | 1400      | 13.10.14.1313.07.480  | 0913-177A | 12.48    | Native Sampling (Dryer)                          |        |
|        | 1421      | 13.10.14.1421.39.358  | 0913-177A | 14.76    | Background                                       |        |
|        | 1515      | 13.10.14.1439.35.902  | 0913-177A | 12.44    | Sampling Dryer Stack - Run 1 (1515-1615)         |        |
|        | 1649      | 13.10.14.1439.35.902  | 0913-177A | 12.45    | Sampling Dryer Stack - Run 2 (1649-1749)         |        |
|        | 1758      | 13.10.14.1439.35.902  | 0913-177A | 12.43    | Sampling Dryer Stack - Run 3 (1758-1858)         |        |
|        | 1919      | 13.10.14.1919.11.369  | CTS       | 14.75    | Background                                       |        |
|        | 1923      | 13.10.14.1923.43.600  | CTS       | 14.77    | CTS (pathlength = 8.69 m)                        |        |
|        | 1935      | 13.10.14.1935.06.334  | 0913-177A | 14.77    | Background                                       |        |
|        | 1953      | 13.10.14.1953.35.0678 | 0913-177A | 14.67    | Water Spectra (Dryer)                            |        |
| 15-Oct | 748       | 13.10.15.0747.33.901  | CTS       | 14.84    | Background                                       | 4      |
|        | 751       | 13.10.15.751.24.798   | CTS       | 14.82    | CTS (pathlength = 8.659 m)                       |        |
|        | 801       | 13.10.15.0801.49.212  | 0913-177A | 14.75    | Background                                       |        |
|        | 911       | 13.10.15.0906.12.604  | 0913-177A | 14.19    | Sampling GHM- Run 1 (0911-1011)                  |        |
|        | 1022      | 13.10.15.0906.12.604  | 0913-177A | 14.12    | Sampling GHM- Run 2 (1022-1122)                  |        |
|        | 1140      | 13.10.15.0906.12.604  | 0913-177A | 14.15    | Sampling GHM- Run 1 (1140-1240)                  |        |
|        | 1303      | 13.10.15.1303.31.934  | CTS       | 14.53    | Background                                       | 7      |
|        | 1311      | 13.10.15.1311.04.345  | CTS       | 14.62    | CTS (pathlength = 8.705222 m)                    |        |
|        | 1321      | 13.10.15.1321.30.008  | 0913-177A | 14.62    | Background                                       |        |
|        | 1348      | 13.10.15.1332.44.520  | 0913-177A | 14.23    | Sampling DHM - Run 1 (1348-1448)                 |        |
|        | 1623      | 13.10.15.1623.38.363  | CTS       | 14.49    | Background                                       |        |
|        | 1627      | 13.10.15.1627.16.305  | CTS       | 14.6     | CTS (pathlength = 8.7387 m)                      |        |
|        | 1639      | 13.10.15.1639.08.005  | 0913-177A | 14.59    | Background                                       | 8      |
|        | 1736      | 13.10.15.1705.34.481  | 0913-177A | 13.73    | Sampling Aspirator - Run 1 (1736-1836)           |        |
|        | 1849      | 13.10.15.1705.34.481  | 0913-177A | 13.64    | Sampling Aspirator - Run 2 (1849-1949)           |        |
|        | 2000      | 13.10.15.1705.34.481  | 0913-177A | 13.72    | Sampling Aspirator - Run 3 (2000-2100)           |        |
|        | 2111      | 13.10.15.2111.32.062  | CTS       | 14.78    | Background                                       |        |
|        | 2115      | 13.10.15.2115.01.112  | CTS       | 14.70    | CTS (pathlength = 8.673 m)                       |        |
|        | 2126      | 13.10.15.2125.43.313  | 0913-177A | 14.75    | Background                                       | 10     |
|        | 2140      | 13.10.15.2140.31.123  | 0913-177A | 14.57    | Water Spectra (Aspirator)                        |        |
|        | 2152      | 13.10.15.2152.01.616  | 0913-177A | 14.58    | Water Spectra (GHM)                              |        |
| 16-Oct | 831       | 13.10.16.0831.24.910  | CTS       | 14.68    | Background                                       | 11     |
|        | 834       | 13.10.16.0834.58.007  | CTS       | 14.81    | CTS (pathlength = 8.614 m)                       |        |
|        | 848       | 13.10.16.0848.20.179  | 0913-177A | 14.70    | Background                                       |        |
|        | 1054      | 13.10.16.1052.55.014  | 0913-177A | 14.16    | Sampling DHM - Run 2 (1054-1154)                 |        |
|        | 1207      | 13.10.16.1052.55.015  | 0913-177A | 14.02    | Sampling DHM - Run 3 (1207-1307)                 |        |
|        | 1321      | 13.10.16.1052.55.016  | 0913-177A | 14.03    | Sampling DHM - Run 4 (1321-1421)                 |        |
|        | 1506      | 13.10.16.1503.27.589  | CTS       | 14.70    | Background                                       |        |
|        | 1507      | 13.10.16.1507.23.086  | CTS       | 14.77    | CTS (pathlength = 8.624 m)                       |        |
|        | 1519      | 13.10.16.1519.05.95   | 0913-177A | 14.75    | Background                                       |        |
|        | 1541      | 13.10.16.1541.15.467  | 0913-177A | 14.65    | Water Spectra (DHM)                              |        |

FTIR compu

Spiking and CTS Record

| Date   | Time | Direct Cylinder Spike |           | System Spiked Gas |           | Native Conc.   |           | SF6 Recovery | Methanol Recovery |
|--------|------|-----------------------|-----------|-------------------|-----------|----------------|-----------|--------------|-------------------|
|        |      | (ppm methanol)        | (ppm SF6) | (ppm methanol)    | (ppm SF6) | (ppm methanol) | (ppm SF6) |              |                   |
| 14-Oct | 1245 | 102.30                | 2.86      | 9.000             | 0.224     | 2.017          | 0.012769  | 7.4%         | 94.5%             |

91.71 ppm std

| Date    | Time | CTS Scan (pathlength) | SEC (ppm) | Cell Pressure (psi) | Cell Temp (deg C) | Deviation from Previous | Deviation from Average |
|---------|------|-----------------------|-----------|---------------------|-------------------|-------------------------|------------------------|
| 14-Oct  | 1215 | 8.693                 | 0.133     | 14.75               | 121               | NA                      | -0.2%                  |
|         | 1923 | 8.685                 | 0.133     | 14.77               | 121               | 0.1%                    | -0.1%                  |
| 15-Oct  | 750  | 8.659                 | 0.132     | 14.19               | 121               | 0.3%                    | 0.2%                   |
|         | 1311 | 8.705                 | 0.134     | 14.62               | 121               | -0.5%                   | -0.4%                  |
|         | 1627 | 8.739                 | 0.133     | 14.6                | 121               | -0.4%                   | -0.7%                  |
|         | 2115 | 8.673                 | 0.132     | 14.6                | 121               | 0.8%                    | 0.0%                   |
| 16-Oct  | 0830 | 8.614                 | 0.134     | 14.81               | 121               | 0.7%                    | 0.7%                   |
|         | 1510 | 8.624                 | 0.132     | 14.77               | 121               | -0.1%                   | 0.6%                   |
| Average |      | 8.674                 | 0.133     | Maximum Deviation   |                   | -0.7%                   |                        |

## **APPENDIX E**

### **Example Calculations**

## EXAMPLE CALCULATIONS

Run Number: Dryer – Run 1

### **Stack Gas Temperature, °R**

$$T_s = 460 + t_s$$

$$T_s = 460 + 199.6 = 659.6 \text{ °R}$$

### **Volume of Dry Gas Sampled at Standard Conditions, Dry Standard Cubic Feet**

$$V_{\text{mstd}} = [17.64] \left[ \frac{\left( P_{\text{bar}} + \frac{\Delta H}{13.6} \right)}{T_m + 460} \right]$$

$$V_{\text{mstd}} = [17.64] [0.9828] [30.692] \left[ \frac{\left( 29.80 + \frac{1.00}{13.6} \right)}{543.8} \right]$$

$$V_{\text{mstd}} = 28.834 \text{ ft}^3$$

### **Volume of Water Sampled, SCF**

$$V_{\text{wstd}} = 0.04715 [\text{Weight of Condensed Moisture}]$$

$$V_{\text{wstd}} = 0.04715 [83.8]$$

$$V_{\text{wstd}} = 3.951 \text{ ft}^3$$

### **Fraction of Water Vapor in Sample Gas Stream**

$$\%H_2O = \left[ \frac{V_{\text{wstd}}}{V_{\text{mstd}} + V_{\text{wstd}}} \right] \times 100$$

$$\%H_2O = \left[ \frac{3.951}{28.834 + 3.951} \right] \times 100$$

$$\%H_2O = 12.05$$

### ***Dry Mole Fraction of Flue Gas***

$$M_{fd} = 1 - \%H_2O/100$$

$$M_{fd} = 1 - [12.05/100]$$

$$M_{fd} = 0.879$$

### ***Molecular Weight of Sample Gas, Dry***

$$M_d = 0.44[\%CO_2] + 0.32[\%O_2] + 0.28[100 - \%O_2 - \%CO_2]$$

$$M_d = 0.44[2.0] + 0.32[19.0] + 0.28[100 - 19.0 - 2.0]$$

$$M_d = 29.08 \text{ pounds/pound-mole}$$

### ***Molecular Weight of Sample Gas, Actual Conditions***

$$M_s = [M_d \times M_{fd}] + [0.18 \times \%H_2O]$$

$$M_s = [29.08 \times 0.879] + [0.18 \times 12.05]$$

$$M_s = 27.74 \text{ pounds/pound-mole}$$

### ***Average Stack Gas Velocity, Feet/second***

$$v_s = K_p C_p \left( \sqrt{(\Delta p)} \right)_{avg} \left[ \sqrt{\frac{T_s + 460}{P_s M_s}} \right]$$

$$v_s = (85.49)(0.84) \left( \sqrt{(2.104)} \right) \left[ \sqrt{\frac{659.6}{(29.61)(27.74)}} \right]$$

$$v_s = 93.35 \text{ feet/second}$$

### ***Wet Volumetric Flue Gas Flow Rate at Stack Conditions, Cubic Feet per Minute***

$$Q_{aw} = 60 \times v_s \times A$$

$$Q_{aw} = 60 \times 70.18 \times 12.57$$

$$Q_{aw} = 70,382 \text{ Actual Cubic Feet per Minute}$$

### **Dry Volumetric Flue Gas Flow Rate at Standard Conditions, Cubic Feet per Minute**

$$Q_{sd} = 60 \times Mfd \times v_s \times A \times \left[ \frac{528}{ts + 460} \right] \left[ \frac{Ps}{29.92} \right]$$

$$Q_{sd} = 60 \times 0.879 \times 93.35 \times 12.57 \left[ \frac{528}{659.6} \right] \left[ \frac{29.61}{29.92} \right]$$

$$Q_{sd} = 49,036 \text{ Dry Standard Cubic Feet per Minute}$$

### **Average THC Dry Basis Concentration as Propane**

$$C_{THCD} = (C_{THCW}) / (M_{fd})$$

Where:  $C_{THCd}$  = dry basis concentration of THC in ppm  
 $M_{fd}$  = dry mole fraction from Method 4 concurrent run

$$C_{THCD} = 29.6 / 0.879 = 33.6 \text{ ppm THC as propane}$$

### **Average THC Dry Basis Concentration as Carbon**

$$C_{THCD} = (C_{THCW}) \times (3) / (M_{fd})$$

Where:  $C_{THCd}$  = dry basis concentration of THC in ppm  
 $M_{fd}$  = dry mole fraction from Method 4 concurrent run

$$C_{THCD} = (29.6) \times (3) / 0.879 = 100.8 \text{ ppm THC as Carbon}$$

### **VOC Emission Rate in Pounds Per Hour**

$$E_{VOC} = (C_{VOC}) (Q_{SD}) (60 \text{ min/hr}) (C_F)$$

Where:  $Q_{SD}$  = measured flow rate in stack in dscfm  
 $C_F$  = Conversion factor in lb/scf – ppm  
 $C_F = 3.117 \times 10^{-8}$  for Carbon

$$E_{VOC} = (100.8) (49,036) (60 \text{ min/hr}) (3.117 \times 10^{-8}) = 9.24 \text{ lb/hr as Carbon}$$



## **APPENDIX F**

### **Gas Cylinder Certification Sheets**

## CERTIFICATE OF ANALYSIS

### Grade of Product: EPA Protocol

**Airgas Specialty Gases**

630 United Drive  
Durham, NC 27713  
919-544-3773 Fax: 919-544-3774  
www.airgas.com

Part Number: E02A199E15A00A6  
Cylinder Number: CC410934  
Laboratory: ASG - Durham - NC  
PGVP Number: B22012  
Gas Code: APPVD

Reference Number: 122-124323950-1  
Cylinder Volume: 146 Cu.Ft.  
Cylinder Pressure: 2015 PSIG  
Valve Outlet: 590  
Analysis Date: Jul 02, 2012

**Expiration Date: Jul 02, 2015**

Certification performed in accordance with "EPA Traceability Protocol (Sept. 1997)" using the assay procedures listed. Analytical Methodology does not require correction for analytical interferences. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a volume/volume basis unless otherwise noted.  
Do Not Use This Cylinder below 150 psig i.e. 1 Mega Pascal

| ANALYTICAL RESULTS |                         |                      |                 |                            |
|--------------------|-------------------------|----------------------|-----------------|----------------------------|
| Component          | Requested Concentration | Actual Concentration | Protocol Method | Total Relative Uncertainty |
| PROPANE            | 28.00 PPM               | 27.99 PPM            | G1              | +/- 1% NIST Traceable      |
| Air                | Balance                 |                      |                 |                            |

| CALIBRATION STANDARDS |        |             |                      |                 |
|-----------------------|--------|-------------|----------------------|-----------------|
| Type                  | Lot ID | Cylinder No | Concentration        | Expiration Date |
| NTRM                  | 080610 | CC263046    | 49.62PPM PROPANE/AIR | May 14, 2018    |

| ANALYTICAL EQUIPMENT         |                      |                             |
|------------------------------|----------------------|-----------------------------|
| Instrument/Make/Model        | Analytical Principle | Last Multipoint Calibration |
| Nicolet 6700 AHR0801333 C3H8 | FTIR                 | Jun 19, 2012                |

Triad Data Available Upon Request

Notes: ANW PN: 781077

Approved for Release



Praxair Distribution Mid-Atlantic  
145 Shimersville Rd.  
Bethlehem, PA 18015  
Tel: (610) 317-1608 Fax: (610) 758 8382  
PGVP ID:

DocNumber: 000003740

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

### Customer & Order Information:

CHEROKEE INSTRUMENTS INC \*  
901 BRIDGE ST  
FUQUAY VARINA NC 275260

Praxair Order Number: 13003732  
Customer P. O. Number: 10429  
Customer Reference Number:

Fill Date: 4/7/2010  
Part Number: EV AIPR50ME-AS  
Lot Number: 917009747  
Cylinder Style & Outlet: AS CGA 590  
Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

### Certified Concentration:

|                  |           |                         |
|------------------|-----------|-------------------------|
| Expiration Date: | 4/12/2018 | NIST Traceable          |
| Cylinder Number: | CC283143  | Analytical Uncertainty: |
| 50.0 ppm PROPANE | ± 1 %     |                         |
| Balance AIR      |           |                         |

Certification Information: Certification Date: 4/12/2010 Term: 96 Months Expiration Date: 4/12/2018

This cylinder was certified according to the 1997 EPA Traceability Protocol, Document #EPA-600/R-97/121, using Procedure G1. Do Not Use this Standard if Pressure is less than 150 PSIG.

### Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

#### 1. Component: PROPANE

Requested Concentration: 50 ppm  
Certified Concentration: 50.0 ppm  
Instrument Used: VARIAN 3300 INST 023 (PROPANE)  
Analytical Method: FID  
Last Multipoint Calibration: 3/16/2010

| First Analysis Data: |                  | Date:    |              | 4/12/2010 |
|----------------------|------------------|----------|--------------|-----------|
| Z: 0                 | R: 50.39         | C: 49.84 | Conc: 49.777 |           |
| R: 50.36             | Z: 0             | C: 50.21 | Conc: 50.147 |           |
| Z: 0                 | C: 50.2          | R: 50.34 | Conc: 50.137 |           |
| UOM: PPM             | Mean Test Assay: |          | 50.02 PPM    |           |

Reference Standard Type: GMIS  
Ref. Std. Cylinder #: CC162336  
Ref. Std. Conc: 50.3 PPM  
Ref. Std. Traceable to SRM #: 1668b  
SRM Sample #: 82-J-49  
SRM Cylinder #: XF003734B

| Second Analysis Data: |                  | Date: |         |  |
|-----------------------|------------------|-------|---------|--|
| Z: 0                  | R: 0             | C: 0  | Conc: 0 |  |
| R: 0                  | Z: 0             | C: 0  | Conc: 0 |  |
| Z: 0                  | C: 0             | R: 0  | Conc: 0 |  |
| UOM: PPM              | Mean Test Assay: |       | 0 PPM   |  |

Analyzed by:

*Megha Patel for*  
John Pribish

Certified by:

*Robin Morgan*  
Robin Morgan



## CERTIFICATE OF ANALYSIS

### Grade of Product: EPA Protocol

|                  |                   |                     |                 |
|------------------|-------------------|---------------------|-----------------|
| Part Number:     | E02AI99E15A3227   | Reference Number:   | 122-124370084-1 |
| Cylinder Number: | SG9164792BAL      | Cylinder Volume:    | 146.2 CF        |
| Laboratory:      | ASG - Durham - NC | Cylinder Pressure:  | 2015 PSIG       |
| PGVP Number:     | B22013            | Valve Outlet:       | 590             |
| Gas Code:        | PPN               | Certification Date: | Apr 17, 2013    |

**Expiration Date: Apr 17, 2021**

Certification performed in accordance with "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (May 2012)" document EPA 600/R-12/531, using the assay procedures listed. Analytical Methodology does not require correction for analytical interference. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a volume/volume basis unless otherwise noted.

Do Not Use This Cylinder below 100 psig, i.e. 0.7 megapascals.

| ANALYTICAL RESULTS |                         |                      |                 |                            |             |
|--------------------|-------------------------|----------------------|-----------------|----------------------------|-------------|
| Component          | Requested Concentration | Actual Concentration | Protocol Method | Total Relative Uncertainty | Assay Dates |
| PROPANE            | 86.00 PPM               | 86.13 PPM            | G1              | +/- 1% NIST Traceable      | 04/17/2013  |
| AIR                | Balance                 |                      |                 |                            |             |

| CALIBRATION STANDARDS |          |             |                       |             |                 |
|-----------------------|----------|-------------|-----------------------|-------------|-----------------|
| Type                  | Lot ID   | Cylinder No | Concentration         | Uncertainty | Expiration Date |
| NTRM                  | 09061735 | CC304058    | 97.82 PPM PROPANE/AIR | +/- 0.5%    | Oct 02, 2013    |

| ANALYTICAL EQUIPMENT         |                      |                             |
|------------------------------|----------------------|-----------------------------|
| Instrument/Make/Model        | Analytical Principle | Last Multipoint Calibration |
| Nicolet 6700 AHR0801333 C3H8 | FTIR                 | Mar 20, 2013                |

Triad Data Available Upon Request

Notes:

*[Signature]*

Approved for Release



Praxair Distribution Mid-Atlantic  
145 Shimersville Rd.  
Bethlehem, PA 18015  
Telephone: (610) 317-1608  
Facsimile: (610) 758-8382

DocNumber: 000007981

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

### Customer & Order Information:

CHEROKEE INSTRUMENTS INC \*  
901 BRIDGE ST  
FUQUAY VARINA NC 275260

Praxair Order Number: 15303079  
Customer P. O. Number: 11036  
Customer Reference Number:

FBI Date: 12/8/2010  
Part Number: AI PR260ZE-AS  
Lot Number: 917034266  
Cylinder Style & Outlet: AS CGA 590  
Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

### Certified Concentration:

|                   |            |                         |
|-------------------|------------|-------------------------|
| Expiration Date:  | 12/13/2013 | NIST Traceable          |
| Cylinder Number:  | CC109519   | Analytical Uncertainty: |
| 258.1 ppm PROPANE | ± 1 %      |                         |
| Balance AIR       |            |                         |

Certification Information: Certification Date: 12/13/2010 Term: 36 Months Expiration Date: 12/13/2013

This cylinder was certified according to the 1997 EPA Traceability Protocol, Document #EPA-600/R-97/121, using Procedure G1  
Do Not Use this Standard if Pressure is less than 150 PSIG

### Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

#### 1. Component: PROPANE

Requested Concentration: 260 ppm  
Certified Concentration: 258.1 ppm  
Instrument Used: VARIAN 3300 INST 023 (PROPANE)  
Analytical Method: FID  
Last Multipoint Calibration: 11/19/2010

| First Analysis Data: |                             | Date: 12/13/2010 |              |
|----------------------|-----------------------------|------------------|--------------|
| Z: 0                 | R: 501.2                    | C: 258.6         | Conc: 258.07 |
| R: 501.4             | Z: 0                        | C: 258.5         | Conc: 257.97 |
| Z: 0                 | C: 258.7                    | R: 500.2         | Conc: 258.17 |
| UOM: PPM             | Mean Test Assay: 258.07 PPM |                  |              |

Reference Standard Type: GMIS  
Ref. Std. Cylinder #: CC138736  
Ref. Std. Conc: 499.9 PPM  
Ref. Std. Traceable to SRM #: 1669b  
SRM Sample #: 81-H-14  
SRM Cylinder #: XF004157b

| Second Analysis Data: |                        | Date: |         |
|-----------------------|------------------------|-------|---------|
| Z: 0                  | R: 0                   | C: 0  | Conc: 0 |
| R: 0                  | Z: 0                   | C: 0  | Conc: 0 |
| Z: 0                  | C: 0                   | R: 0  | Conc: 0 |
| UOM: PPM              | Mean Test Assay: 0 PPM |       |         |

Analyzed by:

John Pribish 12/28/10

Certified by:

Ashley Davila





Praxair Distribution Mid-Atlantic  
145 Shimersville Rd.  
Bethlehem, PA 18015  
Telephone: (610) 317-1608  
Facsimile: (610) 758-8382

DocNumber: 000009995

## CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS

### Customer & Order Information:

CHEROKEE INSTRUMENTS INC \*  
901 BRIDGE ST  
FUQUAY VARINA NC 275260

Praxair Order Number: 16230993  
Customer P. O. Number: 11207  
Customer Reference Number:

Fill Date: 3/17/2011  
Part Number: EV AIPR500ME-AS  
Lot Number: 917117666  
Cylinder Style & Outlet: AS CGA 590  
Cylinder Pressure & Volume: 2000 psig 140 cu. ft.

### Certified Concentration:

|                  |           |                         |
|------------------|-----------|-------------------------|
| Expiration Date: | 3/21/2014 | NIST Traceable          |
| Cylinder Number: | SA20675   | Analytical Uncertainty: |
| 507.1 ppm        | PROPANE   | ± 1 %                   |
| Balance          | AIR       |                         |

Certification Information: Certification Date: 3/21/2011 Term: 36 Months Expiration Date: 3/21/2014

This cylinder was certified according to the 1997 EPA Traceability Protocol, Document #EPA-600/R-97/121, using Procedure G1  
Do Not Use this Standard if Pressure is less than 150 PSIG

### Analytical Data:

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

#### 1. Component: PROPANE

Requested Concentration: 500 ppm  
Certified Concentration: 507.1 ppm  
Instrument Used: VARIAN 3300 INST 023 (PROPANE)  
Analytical Method: FID  
Last Multipoint Calibration: 3/16/2011

|                                     |                  |            |
|-------------------------------------|------------------|------------|
| First Analysis Data:                | Date:            | 3/21/2011  |
| Z: 0 R: 749.9 C: 508.2 Conc: 507.86 |                  |            |
| R: 749.1 Z: 0 C: 507.2 Conc: 506.86 |                  |            |
| Z: 0 C: 506.8 R: 750.4 Conc: 506.46 |                  |            |
| UOM: PPM                            | Mean Test Assay: | 507.06 PPM |

Analyzed by:

John Pribish

Reference Standard Type: GMIS  
Ref. Std. Cylinder #: CC103865  
Ref. Std. Conc: 749.3 PPM  
Ref. Std. Traceable to SRM #: 2646a  
SRM Sample #: 103-C-23  
SRM Cylinder #: XF000820B

|                        |                  |       |
|------------------------|------------------|-------|
| Second Analysis Data:  | Date:            |       |
| Z: 0 R: 0 C: 0 Conc: 0 |                  |       |
| R: 0 Z: 0 C: 0 Conc: 0 |                  |       |
| Z: 0 C: 0 R: 0 Conc: 0 |                  |       |
| UOM: PPM               | Mean Test Assay: | 0 PPM |

Certified by:

Michelle Kostik

## CERTIFICATE OF ANALYSIS

### Grade of Product: EPA Protocol

Airgas Specialty Gases  
630 United Drive  
Durham, NC 27713  
919-544-3773 Fax: 919-544-3774  
www.airgas.com

Part Number: E02AI99E15A0333  
Cylinder Number: CC148274  
Laboratory: ASG - Durham - NC  
PGVP Number: B22012  
Gas Code: APPVD

Reference Number: 122-124344171-1  
Cylinder Volume: 146 Cu.Ft.  
Cylinder Pressure: 2015 PSIG  
Valve Outlet: 590  
Analysis Date: Nov 05, 2012

Expiration Date: Nov 05, 2020

Certification performed in accordance with "EPA Traceability Protocol for Assay and Certification of Gaseous Calibration Standards (May 2012)" document EPA 600/R-12/531, using the assay procedures listed. Analytical Methodology does not require correction for analytical interference. This cylinder has a total analytical uncertainty as stated below with a confidence level of 95%. There are no significant impurities which affect the use of this calibration mixture. All concentrations are on a volume/volume basis unless otherwise noted.

Do Not Use This Cylinder below 100 psig, i.e. 0.7 megapascals.

| ANALYTICAL RESULTS |                         |                      |                 |                            |
|--------------------|-------------------------|----------------------|-----------------|----------------------------|
| Component          | Requested Concentration | Actual Concentration | Protocol Method | Total Relative Uncertainty |
| PROPANE            | 850.0 PPM               | 836.9 PPM            | G1              | +/- 1% NIST Traceable      |
| Air                | Balance                 |                      |                 |                            |

| CALIBRATION STANDARDS |        |             |                            |                 |
|-----------------------|--------|-------------|----------------------------|-----------------|
| Type                  | Lot ID | Cylinder No | Concentration              | Expiration Date |
| NTRM                  | 110609 | CC343416    | 1000.3PPM PROPANE/NITROGEN | Mar 04, 2017    |

| ANALYTICAL EQUIPMENT         |                      |                             |
|------------------------------|----------------------|-----------------------------|
| Instrument/Make/Model        | Analytical Principle | Last Multipoint Calibration |
| Nicolet 6700 AHR0801333 C3H8 | FTIR                 | Oct 11, 2012                |

Triad Data Available Upon Request

Notes:ANW PN: 781018

Approved for Release



6141 EASTON ROAD, BLDG 1, PLUMSTEADVILLE, PA 18949-0310

Phone: 800-331-4953 Fax: 215-766-7226

**CERTIFICATE OF ACCURACY: Certified Working Class Calibration Standard**

**Product Information**

Document #: 46628943-001  
Item No.: MM301080-T-30AL  
P.O. No.: 06081203

Cylinder Number: ALM018055  
Cylinder Size: 30AL  
Certification Date: 21Jun2012  
Expiration Date: 21Jun2014  
Lot Number: PLU0109851

**Customer**

ENTHALPY ANALYTICAL, INC.  
06081203  
800-1 CAPITOLA DRIVE  
DURHAM, NC 27703  
US

**CERTIFIED CONCENTRATION**

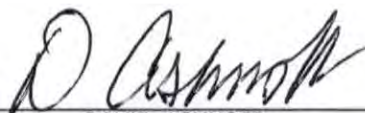
| <u>Component Name</u> | <u>Concentration<br/>(Moles)</u> | <u>Accuracy<br/>(+/-%)</u> |
|-----------------------|----------------------------------|----------------------------|
| METHANOL              | 105. PPM                         | 5                          |
| SULFUR HEXAFLUORIDE   | 3.0 PPM                          | 5                          |
| NITROGEN              | BALANCE                          |                            |

**TRACEABILITY**

**Traceable To**

Scott Reference Standard

APPROVED BY:

  
DAVID ASHNOFF

DATE:

6-21-2012



## CERTIFICATE OF ANALYSIS

**Grade of Product: CERTIFIED STANDARD-SPEC**

Part Number: X03NI99C15A1FX5  
Cylinder Number: CC90659  
Laboratory: ASG - Port Allen - LA  
Analysis Date: Sep 30, 2013  
Lot Number: 83-124390037-1A

Reference Number: 83-124390037-1A  
Cylinder Volume: 144.4 CF  
Cylinder Pressure: 2015 PSIG  
Valve Outlet: 350S

Product composition verified by direct comparison to calibration standards traceable to N.I.S.T. weights and/or N.I.S.T. Gas Mixture reference materials.

### ANALYTICAL RESULTS

| Component           | Requested Concentration | Actual Concentration (Mole %) | Analytical Uncertainty |
|---------------------|-------------------------|-------------------------------|------------------------|
| SULFUR HEXAFLUORIDE | 3.000 PPM               | 3.127 PPM                     | +/- 5%                 |
| METHANOL            | 100.0 PPM               | 91.71 PPM                     | +/- 2%                 |
| NITROGEN            | Balance                 |                               |                        |

Notes:

  
Approved for Release

## CERTIFICATE OF ANALYSIS

**Grade of Product: CERTIFIED STANDARD-SPEC**

Part Number: X02NI99C15A1268

Cylinder Number: CC432538

Laboratory: ASG - Durham - NC

Analysis Date: May 08, 2013

Lot Number: 122-124373993-1

Reference Number: 122-124373993-1

Cylinder Volume: 144.4 CF

Cylinder Pressure: 2015 PSIG

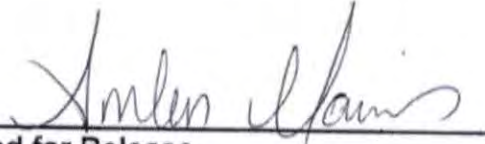
Valve Outlet: 350

Product composition verified by direct comparison to calibration standards traceable to N.I.S.T. weights and/or N.I.S.T. Gas Mixture reference materials.

### ANALYTICAL RESULTS

| Component | Requested<br>Concentration | Actual Concentration<br>(Mole %) | Analytical<br>Uncertainty |
|-----------|----------------------------|----------------------------------|---------------------------|
| ETHYLENE  | 100.0 PPM                  | 99.88 PPM                        | +/- 2%                    |
| NITROGEN  | Balance                    |                                  |                           |

Notes:

  
Approved for Release

## **APPENDIX F**

### **Equipment Calibration Sheets**

**APEX INSTRUMENTS METHOD 5 POST-TEST CONSOLE CALIBRATION**  
**USING CALIBRATED CRITICAL ORIFICES**  
**3-POINT ENGLISH UNITS**

| Meter Console Information |        |
|---------------------------|--------|
| Console Model Number      | 522    |
| Console Serial Number     | 909033 |
| DGM Model Number          | RW 110 |
| DGM Serial Number         | 961167 |

| Calibration Conditions                   |      |          |       |
|------------------------------------------|------|----------|-------|
| Date                                     | Time | 10/23/13 | 1030  |
| Barometric Pressure                      |      | 29.46    | in Hg |
| Theoretical Critical Vacuum <sup>1</sup> |      | 13.91    | in Hg |
| Calibration Technician                   |      | TTB      |       |

| Factors/Conversions |        |          |
|---------------------|--------|----------|
| Std Temp            | 528    | °R       |
| Std Press           | 29.92  | in Hg    |
| K <sub>1</sub>      | 17.647 | oR/in Hg |

<sup>1</sup>For valid test results, the Actual Vacuum should be 1 to 2 in. Hg greater than the Theoretical Critical Vacuum shown above.

<sup>2</sup>The Critical Orifice Coefficient, K', must be entered in English units, (ft<sup>3</sup>\*°R<sup>1/2</sup>)/(in.Hg\*min).

| Calibration Data |                     |                    |                    |                        |                      |                  |                        |                     |                     |                  |
|------------------|---------------------|--------------------|--------------------|------------------------|----------------------|------------------|------------------------|---------------------|---------------------|------------------|
| Run Time         |                     | Metering Console   |                    |                        |                      | Critical Orifice |                        |                     |                     |                  |
| Elapsed          | DGM Orifice<br>ΔH   | Volume<br>Initial  | Volume<br>Final    | Outlet Temp<br>Initial | Outlet Temp<br>Final | Serial<br>Number | Coefficient            | Amb Temp<br>Initial | Amb Temp<br>Final   | Actual<br>Vacuum |
| (θ)              | (P <sub>m</sub> )   | (V <sub>mi</sub> ) | (V <sub>mf</sub> ) | (t <sub>mi</sub> )     | (t <sub>mf</sub> )   | FO55             | K'                     | (t <sub>amb</sub> ) | (t <sub>amb</sub> ) |                  |
| min              | in H <sub>2</sub> O | cubic feet         | cubic feet         | °F                     | °F                   | FO55             | see above <sup>2</sup> | °F                  | °F                  | in Hg            |
| 16.0             | 1.20                | 637.000            | 646.659            | 62                     | 63                   | FO55             | 0.4594                 | 63                  | 65                  | 19.00            |
| 13.0             | 1.20                | 647.000            | 654.859            | 64                     | 64                   | FO55             | 0.4594                 | 65                  | 65                  | 19.00            |
| 13.0             | 1.20                | 655.100            | 662.965            | 64                     | 65                   | FO55             | 0.4594                 | 65                  | 66                  | 19.00            |

| Results                |                        |                         |                         |                    |           |                              |                     |             |
|------------------------|------------------------|-------------------------|-------------------------|--------------------|-----------|------------------------------|---------------------|-------------|
| Standardized Data      |                        |                         |                         | Dry Gas Meter      |           |                              |                     |             |
| Dry Gas Meter          |                        | Critical Orifice        |                         | Calibration Factor |           | Flowrate                     | ΔH @                |             |
| (V <sub>m(std)</sub> ) | (Q <sub>m(std)</sub> ) | (V <sub>cr(std)</sub> ) | (Q <sub>cr(std)</sub> ) | Value              | Variation | Std & Corr                   | 0.75 SCFM           | Variation   |
| (V <sub>m(std)</sub> ) | (Q <sub>m(std)</sub> ) | (V <sub>cr(std)</sub> ) | (Q <sub>cr(std)</sub> ) | (Y)                | (ΔY)      | (Q <sub>m(std)</sub> )(corr) | (ΔH@)               | (ΔΔH@)      |
| cubic feet             | cfm                    | cubic feet              | cfm                     |                    |           | cfm                          | in H <sub>2</sub> O |             |
| 9.639                  | 0.602                  | 9.460                   | 0.591                   | 0.981              | 0.000     | 0.591                        | 1.934               | 0.001       |
| 7.821                  | 0.602                  | 7.679                   | 0.591                   | 0.982              | 0.000     | 0.591                        | 1.933               | -0.001      |
| 7.819                  | 0.601                  | 7.675                   | 0.590                   | 0.982              | 0.000     | 0.590                        | 1.933               | -0.001      |
| Pretest Gamma          | 0.9828                 | % Deviation             | 0.1                     | 0.982              | Y Average |                              | 1.933               | ΔH@ Average |

Note: For Calibration Factor Y, the ratio of the reading of the calibration meter to the dry gas meter, acceptable tolerance of individual values from the average is +0.02.

I certify that the above Dry Gas Meter was calibrated in accordance with USEPA Methods, CFR Title 40, Part 60, Appendix A-3, Method 5, 16.2.3

Signature Todd Brozell

Date 10/23/2013

Type S Pitot Tube Inspection and  
Stack Thermocouple Calibration

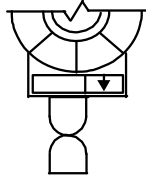
**GENERAL INFORMATION**

Probe ID   
Date

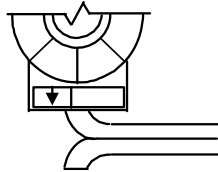
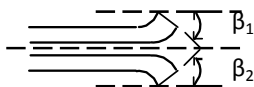
Personnel   
Coefficient Value

**PITOT TUBE INSPECTION**

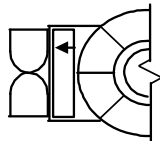
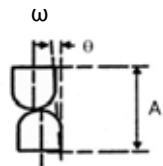
Pitot Tube assembly level? (yes/no)   
Pitot Tube obstruction? (yes/no)   
Pitot Tube openings damaged? (yes/no)



$\alpha_1$    $\leq \pm 10^\circ$   
 $\alpha_2$    $\leq \pm 10^\circ$



$\beta_1$    $\leq \pm 5^\circ$   
 $\beta_2$    $\leq \pm 5^\circ$



$\gamma$    
 $\theta$    
 $z = A \tan (\gamma)$    $\leq \pm \frac{1}{8}"$   
 $\omega = A \tan (\theta)$    $\leq \pm \frac{1}{32}"$

$D_t$    
( $\frac{3}{16}" < D_t < \frac{3}{8}"$  Recommended)

$A$

$P_A$   
 $P_B$    
( $1.05 < P/D_t < 1.50$  Recommended)

**STACK THERMOCOUPLE CALIBRATION**

Ref. Type

Ref. ID

| Source                       | Ref., °F | Stack TC, °F | Abs. Diff., °F |
|------------------------------|----------|--------------|----------------|
| Ice bath                     | 43       | 45           | 2              |
| Ambient                      | 75       | 75           | 0              |
| Hot water                    | 193      | 194          | 1              |
| Maximum Temp. Difference, °F |          |              | 2              |

Type S Pitot Tube Inspection and  
Stack Thermocouple Calibration

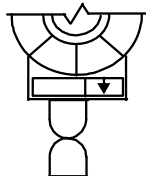
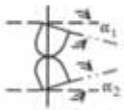
**GENERAL INFORMATION**

Probe ID   
Date

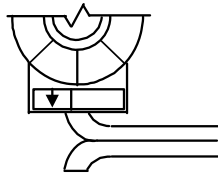
Personnel   
Coefficient Value

**PITOT TUBE INSPECTION**

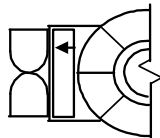
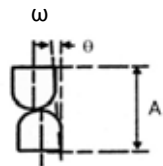
Pitot Tube assembly level? (yes/no)   
Pitot Tube obstruction? (yes/no)   
Pitot Tube openings damaged? (yes/no)



$\alpha_1$    $\leq \pm 10^\circ$   
 $\alpha_2$    $\leq \pm 10^\circ$



$\beta_1$    $\leq \pm 5^\circ$   
 $\beta_2$    $\leq \pm 5^\circ$



$\gamma$    
 $\theta$    
 $z = A \tan (\gamma)$    $\leq \pm \frac{1}{8}"$   
 $\omega = A \tan (\theta)$    $\leq \pm \frac{1}{32}"$

$D_t$    
( $\frac{3}{16}" < D_t < \frac{3}{8}"$  Recommended)

$A$

$P_A$   
 $P_B$    
( $1.05 < P/D_t < 1.50$  Recommended)

**STACK THERMOCOUPLE CALIBRATION**

Ref. Type

Ref. ID

| Source                       | Ref., °F | Stack TC, °F | Abs. Diff., °F |
|------------------------------|----------|--------------|----------------|
| Ice bath                     | 43       | 45           | 2              |
| Ambient                      | 75       | 75           | 0              |
| Hot water                    | 193      | 192          | 1              |
| Maximum Temp. Difference, °F |          |              | 2              |