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March 8, 2010

***Via Electronic Filing***
Ms. LaDonna Castañuela
Chief Clerk, MC-105
Texas Commission on Environmental Quality
12100 Park 35 Circle, Building F
Austin TX 78753

Re: TCEQ Docket No. 2009-0032-AIR; SOAH Docket No. 582-09-2045; Application of IPA Coleto Creek LLC for State Air Quality Permit 83778, Prevention of Significant Deterioration Air Quality Permit PSD-TX-1118 and Hazardous Air Pollutant Permit HAP-18

Dear Ms. Castañuela:

Enclosed please find Environmental Defense Fund, Inc.'s Exceptions to the Proposal for Decision.

If you have any questions concerning this filing, please do not hesitate to contact me at the number above.

Sincerely,

Paul R. Tough

PRT/jam
Enclosure

cc: Honorable Judge William G. Newchurch *(via email)*
Honorable Judge Richard R. Wilfong *(via email)*
Service List *(via email)*
SOAH Docket Clerk *(via facsimile)*
Bridget Bohac, TCEQ Office of Public Assistance *(via facsimile)*

**SOAH DOCKET NO. 582-09-2045**
**TCEQ DOCKET NO. 2009-0032-AIR**

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|---|---|---|
| **APPLICATION OF IPA COLETO CREEK, LLC FOR STATE AIR QUALITY PERMIT 83778 AND PREVENTION OF SIGNIFICANT DETERIORATION AIR QUALITY PERMIT PSD-TX-1118 AND FOR HAZARDOUS AIR POLLUTION MAJOR SOURCE [FCAA § 112(g)] PERMIT HAP-18** | § | **BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS** |

**ENVIRONMENTAL DEFENSE FUND'S EXCEPTIONS**
**TO THE PROPOSAL FOR DECISION**

**TO THE HONORABLE COMMISSIONERS:**

COMES NOW Protestant Environmental Defense Fund, Inc. (EDF) and files this its exceptions to the proposal for decision (PFD) submitted by the Administrative Law Judges (ALJs). In addition to the exceptions specifically discussed below, EDF also adopts and incorporates by reference all the exceptions, arguments and supporting documents submitted on behalf of the other protestants in this matter. In order for brevity, EDF focuses only on certain exceptions to the PFD, which in no way should be construed as a limit on or a waiver of issues that may be raised in a future motion for rehearing.

## I. INTRODUCTION

The ALJs' PFD recommends that the TCEQ issue the Draft Permit, but lower the Best Available Control Technology (BACT) emission limit for total $PM/PM_{10}$ to 0.025 lb/MMBtu. While EDF agrees that the BACT emission limit for total $PM/PM_{10}$ should be lower, EDF does not agree that the Applicant has prevailed on all other issues. Therefore, EDF urges the Commissioners to either recommend denial or remand the Application and Draft Permit to the Executive Director (ED) for further review.

## II. EXCEPTIONS

**An Unapproved Revision of a State Implementation Plan (SIP) is Invalid**

If a state wants to add, delete, or otherwise modify any SIP provision, it must submit the proposed change to EPA for approval. *See Sierra Club v. Tennessee Valley Authority*, 430 F.3d 1337, 1346 (11th Cir. 2005). An unapproved revision of any part of a SIP is invalid under the Clean Air Act. *See Sierra Club v. Tennessee Valley Authority* at 1347; *Train v. Natural Res. Def. Council, Inc.*, 421 U.S. 60, 92, 95 S.Ct. 1470, 1488, 43 L.Ed.2d 731 (1975) ("[A] polluter is subject to existing requirements until such time as he obtains a variance, and variances are not available under the revision authority until they have been approved by both the State and the Agency."); *United States v. Ford Motor Co.*, 814 F.2d 1099, 1103 (6th Cir. 1987) (holding that "invalidation of a SIP on technical grounds by a state court…cannot be given effect, because….revisions and variances of properly promulgated SIPs require EPA approval"); 40 C.F.R. § 51.105 ("Revisions of a plan, or any portion thereof, will not be considered part of an applicable plan until such revisions have been approved by [EPA] in accordance with this part.").

On February 1, 2006, the TCEQ submitted amendments to 30 Tex. Admin. Code § 116.160 to EPA as a SIP revision to the Texas Prevention of Significant Deterioration (PSD) SIP. These amendments included removal of certain references to federal definitions and requirements regarding BACT as it relates to PSD. On September 23, 2009, EPA proposed disapproval of this revision to the Texas SIP. *See* 74 F.R. 48467, 48472, September 23, 2009. Therefore, pursuant to law, the applicable Texas SIP is the one where the federal definition of BACT is incorporated by reference into the PSD program. Accordingly, the adopted-by-reference federal definition of BACT is also the Texas definition of BACT for PSD purposes.

The Federal Clean Air Act defines BACT as:

> "an emission limitation based on the maximum degree of reduction of each pollutant subject to regulation under this chapter emitted from or which results from any major emitting facility, 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 facility 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." 42 U.S.C. § 7479(3).[1]

Focusing on the terms "production processes" and "innovative fuel combustion techniques," it is clear that no such alternative processes or techniques were considered by the ED in its review of IPA's Application. Specifically, the ED only considered one production process or fuel combustion technique – pulverized coal boilers – in its BACT review.[2] According to proposed Finding of Fact (FOF) 201 the limited review was consistent with EPA policy, where consideration of other fuel combustion techniques in the BACT analysis is not required because that would require the source as proposed by the applicant to be redefined.[3] It is unclear what evidence the ALJs are relying upon to support their conclusion that EPA policy does not require consideration of IGCC or other processes or techniques in a BACT review. Such a policy is inconsistent with the definition of BACT and more recent regulatory action.

In support of its argument that consideration of IGCC is not required, the applicant cited one EPA document.[4] This document is dated December 13, 2005 and is the same document that

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[1]The federal regulatory definition of BACT is slightly different, but it also contains the terms "production processes" and "innovative fuel combustion techniques." *See* 40 C.F.R. § 52.21(b)(12).

[2]*See* ED Ex. 11, pg. 17 (or 482) ("The applicant was not required to nor did the TCEQ evaluate any other electric generation methods such as IGCC [Integrated Gasification Combined Cycle] or circulating fluidized bed (CFB) boilers.")

[3]The as proposed FOF 201 uses the word "defined" instead of "redefined," but that may just be a typo.

[4]*See* Applicant's Brief in Reply to Closing Arguments pg. 8.

EPA has since stipulated is not binding.[5] Moreover, since that time, EPA decisions have expressly rejected the notion that requiring consideration of IGCC is categorically "re-defining the source" in the context of solid-fuel fired electric generating units. *In re: Desert Rock Energy Company, LLC*, 2009 WL 3126170, (E.A.B., September 24, 2009). In the *Desert Rock* decision, the EPA's Environmental Appeals Board granted a motion for voluntary remand by EPA Region 9, finding that the Region had previously abused its discretion by declining to consider IGCC. *Desert Rock*, 2009 WL 3126170 at p. 2. In *Desert Rock*, the EAB specifically criticized the Amarillo Court of Appeals' decision upholding the TCEQ's actions in *Sandy Creek*:

> According to the [Amarillo Court of Appeals], "the only control technologies that must be considered in a BACT analysis are those control technologies that can be incorporated into or added to the facility as proposed by the applicant," . . . In so concluding, the court relied on an extremely narrow definition of the terms "applied" and "application" [citation omitted]. In fact, under the Texas Court of Appeal's reading of the statute, only add-on controls – because, according to the court, only these could be applied to the proposed source – could be considered BACT. This reading is inconsistent with the language, purpose, and legislative history of the CAA as well as EPA's longstanding interpretation and practice. Thus, the Board respectfully disagrees with the Texas Court of Appeal's statutory analysis and its conclusion based on its interpretation of the statute. 2007 WL 3126170 at 33-34.[6]

FOF 201 and the PFD are inconsistent with recent EPA decisions and the federal definition of BACT, which is also Texas law as previously discussed, and as a result the ED's BACT review is deficient. Therefore, the Application should be denied, or in the alternative

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[5]*See* EDF Ex. 35, pg. 2: EPA agrees and stipulates that the December 13, 2005 document is not final agency action and creates no rights, duties, obligations, nor any other legally binding effects on EPA, the states, tribes, any regulated entity or any person.

[6]Other recent decisions concur. In *Utah Chapter of Sierra Club v. Utah Air Quality Bd.*, ___ P.2d___, 2009 WL 4406150 at *12 (Utah 2009), the Utah Supreme Court held that considering IGCC was not redefining the source where the "basic design of the…proposed facility is an electric power generating plant fueled by coal."

remanded and the TCEQ required to perform a proper BACT analysis – including consideration of IGCC – in accordance with EPA guidance and the proper BACT definition.

**No Permit-Specific Justification for the $PM_{10}$-for-$PM_{2.5}$ Surrogate Policy**

It is undisputed that EPA has established a NAAQS for $PM_{2.5}$. Additionally, the TCEQ has adopted all of the NAAQS by reference and specified that they are to be enforced throughout Texas.[7] Therefore, the NAAQS for $PM_{2.5}$ is also a Texas standard.

The ALJs are correct that the $PM_{10}$-for-$PM_{2.5}$ surrogate policy originated with EPA. It is an EPA policy that the ALJs have concluded the TCEQ has accepted many times in prior air quality applications. However, the policy has always been an interim policy, and it should not be generally presumed to apply in all cases.[8]

Even prior to the Trimble Order, caselaw established as a general proposition that a surrogate may be used only after it has been shown to be reasonable to do so. *See Sierra Club v. EPA*, 353 F.3d 976, 982-984 (D.C. Cir. 2004). It is EPA's position that the overarching legal principle from this decision, along with other decisions, is that a surrogate may be used only after it has been shown to be reasonable (such as where the surrogate is a reasonable proxy for the pollutant or has a predictable correlation to the pollutant) and that this principle applies where an applicant or permitting authority seeks to rely upon the $PM_{10}$ Surrogate Policy in lieu of a $PM_{2.5}$ analysis to obtain a PSD permit.[9] The law was always that a surrogate is appropriate only after a permit-specific analysis and the Trimble Order is just another example of the application of that principle.

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[7] 30 Tex. Admin. Code § 101.21.

[8] Applicant's Ex. 38; EDF Ex. 18 (the "Trimble Order") ("EPA believes that these cases demonstrate the need for permit applicants and permitting authorities to determine whether $PM_{10}$ is a reasonable surrogate for $PM_{2.5}$ under the facts and circumstances of the specific permit at issue, and not proceed on a general presumption that $PM_{10}$ is always a reasonable surrogate for $PM_{2.5}$.")

[9] 75 F.R. 6827, 6831 (February 11, 2010) (EDF requests that official notice be taken of this federal register); EDF Ex. 18.

The ALJs' FOFs 77 and 78 are not supported by the evidence. Specifically, the only evidence presented on EPA's current policy with respect to the surrogate policy shows that blind reliance on the policy is simply not sufficient.[10] To support the argument that the policy applies to CC2, the Applicant and the ALJs point to technical and regulatory barriers to analysis of $PM_{2.5}$ emissions from the CC2 project. These barriers are not a permit-specific analysis, but rather broad generalizations for not analyzing $PM_{2.5}$. Therefore, FOF 78 should be changed to reflect the Applicant's actual analysis of $PM_{2.5}$ emissions from the CC2 project, which in this instance is none. Specifically, the Applicant made no attempt to quantify or estimate $PM_{2.5}$ emissions or request $PM_{2.5}$ emission limits, as both the Applicant's expert Mr. Fraser and other applicants have done previously.[11] Clearly there was no barrier to White Stallion estimating $PM_{2.5}$ emissions and requesting emission limitations. IPA should have estimated and requested emission limitations as part of a BACT analysis for $PM_{2.5}$. Nor did the Applicant attempt to model $PM_{2.5}$ emissions. Instead, the Applicant maintains that technical difficulties remain with implementing PSD for $PM_{2.5}$, which justify continued use of the surrogate policy.

IPA's technical difficulties are very generic and based primarily on the fact that EPA has not formally adopted or proposed reference method tests to measure direct $PM_{2.5}$ and condensable $PM_{2.5}$ or published modeling guidance for $PM_{2.5}$ precursors – the later of which the EPA has already concluded is not a valid basis for continuing to use the surrogate policy.[12] As described in the Trimble Order and in the recent federal register preamble, the $PM_{2.5}$ implementation issues that led to the adoption of the $PM_{10}$ surrogate policy in 1997 have been

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[10] *See* EDF Ex. 18.
[11] Tr. at 348; EDF Ex. 21.
[12] 75 F.R. 6827, 6833 ("However, this limitation does not preclude a permit applicant from determining whether the direct emissions of $PM_{2.5}$ from the proposed source or modification will cause or contribute to a violation of the NAAQS for $PM_{2.5}$, and is not a valid basis for using a $PM_{10}$ analysis as a surrogate to satisfy the $PM_{2.5}$ requirements.")

largely resolved to a degree sufficient for the owners and operators of sources and permitting authorities to conduct meaningful permit-related $PM_{2.5}$ analysis.[13] For example,

> "Adequate procedures for the collection of ambient $PM_{2.5}$ are now well established throughout the country and provide data useful for the purpose of PSD permitting. Also air quality modeling of direct $PM_{2.5}$ emissions can be accomplished using an EPA-approved model to predict ambient $PM_{2.5}$ impacts caused by new and modified sources of $PM_{2.5}$ emissions. Emissions factors for calculating $PM_{2.5}$ emissions from various source categories and equipment are also available, as are national inventories of $PM_{2.5}$ emissions." 75 F.R. 6827, 6833.

The Applicant instead of recognizing that these implementation issues had been resolved chose to still rely on the surrogate policy without permit-specific justification. Therefore, the Applicant has not met its burden and the Application should be denied, or in the alternative remanded and the Applicant and TCEQ required to perform a proper $PM_{2.5}$ analysis – including consideration of permit-specific factors – in accordance with caselaw and EPA guidance.

**CEMS for Filterable PM**

In the PFD the ALJs recommend that IPA not be required to install PM CEMS. They reach that recommendation for three reasons: 1) the absence of any TCEQ or EPA rule or regulation requiring PM CEMS; 2) the EPA's recent indication that PM CEMS are not required for coal-fired power plants; and 3) the functional short-comings of PM CEMS. None of these reasons provide a sufficient basis for recommending denial of PM CEMS. For example, any inferences drawn from EPA's 2008 rulemaking or the absence of a specific rule requiring PM CEMS are superseded by EPA's more recent comments on this specific Application and others in which EPA recommends consideration of PM CEMS for filterable PM.[14] Additionally, although the ALJs may be correct that PM CEMS are not explicitly required by TCEQ or EPA

[13] *Id.*; The EPA has even proposed to end the surrogate policy before the end of the three-year transition period for revising SIPs. *See* 75 F.R. 6827, 6834.
[14] EDF Ex. 38 (emphasis added); Sierra Club Ex. 122B.

rule or regulation, BACT emission limits still must be met on a continual basis.[15] This includes the BACT limit for filterable PM. As echoed by OPIC and expressed by EPA, PM CEMS provide a greater degree of confidence that the PM control device is operating as intended than periodic performance testing.[16] PM CEMS perceived inability to measure condensable PM is not relevant to its ability to measure for filterable PM, which is what is recommended by EPA. Consequently, if the intent of the public participation process is to issue the most environmentally protective permit then PM CEMS should be included as part of this permit.

**Surface Roughness**

AERSURFACE requires a user to enter the type of coordinate used to define the center of the study area, whether they be UTM coordinates or lat/long coordinates.[17] According to the AERSURFACE User's Guide the entered coordinates should be based on the location of the meteorological tower (measurement site) for the meteorological data to be processed with the output surface characteristics.[18] Additionally, in the only example provided in the AERSURFACE User's Guide, the center of the study area was located at the NWS meteorological station tower at an airport.[19] However, for CC2 there is no meteorological tower within the plant site measuring wind speed and direction. Therefore, an alternative center location should be used. The Applicant identified an alternative center location – albeit a pollutant-specific location. EDF's modeler identified a center location as CC2's main stack, which is the largest emitter of all pollutants and happens to be located close to a large flat reservoir. IPA chose the location of CC2's main stack, not the protestants. If IPA were only

[15]ED Ex. 4, pg. B-56; Additionally the draft permit heading is titled "Continuous Demonstration of Compliance." ED Ex. 9, pg. 11.
[16]EDF Ex. 38.
[17]EDF Ex. 102 at 9.
[18]Id. (emphasis added).
[19]Id. at 14.

proposing to emit PM then its choice of center location may be supportable. However, IPA is proposing to emit a number of different pollutants besides PM and its choice of center location is not supportable on that basis. Because the evidence establishes that the choice of center location greatly influences the surface roughness determination and modeling, the Application is deficient and should be denied or remanded to the ED for further review.

**CC2 is Not De Minimis for VOC**

Both IPA and the ALJs agree that CC2's proposed VOC emissions would fall below the established de minimis level, which eliminates any need to further study CC2's potential impact on ozone.[20] The ALJs go further and state that given the de minimis VOC emissions the Protestants' other ozone objections are moot.[21] This is incorrect for a couple reasons: 1) the VOC emissions from the CC2 project are above de minimis, and 2) an ozone analysis is required.

Since the CC2 project will cause a significant increase in emissions, the project is classified as a major modification to the existing Coleto Creek Power Station.[22] IPA correctly identified the PSD significant rate for a modification to an existing major source as 40 tpy for VOC.[23] In fact, TCEQ's rules on PSD review state that the significance threshold for ozone is 40 tpy of VOC **or** NOx.[24] IPA will emit more than 40 tpy of VOCs. IPA will emit more than 100 tpy of NOx. IPA's emissions of NOx and VOC are of such quantity that an ozone analysis is required.

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[20]PFD pg. 94.
[21]Id.
[22]IPA Ex. 3, pg. 1-5 or IPA0000021.
[23]Id. at 3-5 or IPA0000043.
[24] 30 Tex. Admin. Code § 116.12(18) (incorporating 40 C.F.R. § 51.166(b)(23)); *See Also* 30 Tex. Admin. Code § 116.12(17) (A major stationary source that is major for VOCs **or** NOx is considered to be major for ozone). (emphasis added).

Additionally, TCEQ rule 30 Tex. Admin. Code § 116.160(c)(2) incorporates 40 C.F.R. § 52.21(i), which according to the Applicant specifies when an ozone analysis is required[25] and it provides: "No *de minimis* air quality level is provided for ozone. However, any net emissions increase of 100 tons per year or more of volatile organic compounds or nitrogen oxides subject to PSD would be required to perform an ambient impact analysis, including the gathering of ambient air quality data."[26] There is no dispute that CC2 will emit more than 100 tpy of nitrogen oxides so an ozone analysis is required.

The TCEQ guidance document that the Applicant relies on to support its de minimis argument, as binding above and beyond the requirements found in rule, was last updated in 1999 and even then it states that the "8-hour form of the [ozone] standard is not compatible with the 100 tpy threshold [for VOCs]."[27] The 1999 guidance document without any explanation uses 100 tpy of VOC as a threshold for an ozone analysis. Moreover, and most critically, this TCEQ guidance document conflicts with 30 Tex. Admin. Code § 116.160(c)(2); 40 C.F.R. § 52.21(i), which apply to net emission increases of 100 tpy of VOCs or NOx. Finally, it is clear that EPA through its comments on the CC2 project thought an ozone analysis was required.[28] The ALJs are incorrect that an ozone analysis is not required because the VOC emissions are de minimis. The VOC emissions are not de minimis and an ozone analysis is required.

**State Effects Review**

The ALJs conclude that adverse effects due to short-term exposure of coal dust emissions from CC2 would not be expected.[29] However, the ALJs' conclusion is based in part on their

[25]Applicant's Brief in Reply to Closing Arguments, pg. 59.
[26]40 C.F.R. § 52.21(i)(5)(i), n. 1.
[27]Applicant's Ex. 30, pg. 32 (emphasis added).
[28]EDF Ex. 38, "[W]e wish to work with TCEQ to facilitate an appropriate ozone impact analysis for Coleto Creek Unit No. 2."
[29]PFD pg. 117.

comparison of the 1-hr concentration of coal dust to the worker-exposure level for coal dust. The coal dust ESL is derived from the worker-exposure level, which is developed based on the assumption of a health adult male.[30] In order to account for sensitive members of the population, in addition to healthy adult males, the TCEQ adds a margin of safety to the worker-exposure level to derive the coal dust ESL.[31] The evidence is undisputed that sensitive members of the population, specifically children, have and do access areas of Perdido Creek.[32] Therefore, it is not appropriate to compare the GLCmax for coal dust to the worker-exposure level, which is not protective of sensitive members of the population, in order to justify finding the impacts of coal dust allowable.

Additionally, while the ALJs may have not found the evidence on other locations where there were exceedances of the short-term coal dust ESL compelling, the fact remains that there are other locations. Attached to the Applicant's prefiled testimony is a CD containing the on-property modeling runs. This CD contains a file that lists at least a dozen (12) other receptor locations where the short-term coal dust ESL is exceeded by at least three-times the ESL (i.e. the GLC exceeds 27 $\mu g/m^3$).[33] Clearly exposure will not be just limited to the GLCmax location.

**Carbon Dioxide and Other Greenhouse Gas Emissions**

There is no dispute that the ED failed to consider emissions of $CO_2$ or establish any conditions in the Draft Permit limiting or otherwise addressing $CO_2$ emissions. EDF offered testimony and evidence concerning $CO_2$ emissions, but that evidence was stricken by the ALJs.

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[30]Tr. at 976.
[31]Id.
[32]Tr. at 978 – 979.
[33]*See* Attachment A to these Exceptions, which is a printout of a spreadsheet from IPA Ex. 44 ("CD with Air Dispersion Modeling Runs for On-Property Perdido Creek Area"). Specifically the Attachment A is just a couple pages from the very large file 'Coal_1HR_PM10_Fence_OUT' in the 'Coal ESL Modeling – Fence line – PM10' file folder.

While EDF recognizes that TCEQ takes the position that it does not regulate $CO_2$ emissions and other greenhouse gases ("GHGs"), the TCEQ's continued failure to act on the subject ignores the pronouncement of the United States Supreme Court that $CO_2$ is a regulated pollutant under the federal Clean Air Act. *Massachusetts v. EPA*, 549 U.S. 497, 127 S.Ct. 1438 (2007). The TCEQ's continued inaction on $CO_2$ also stands in stark contrast to the EPA. Effective September 22, 2009, the EPA announced a final rule requiring reporting of GHG emissions.[34] And on December 7, 2009, the EPA announced a finding that GHGs including $CO_2$ endanger public health and welfare (the "Endangerment Finding").[35] In this finding, the EPA specifically pronounced that emissions of GHGs including $CO_2$ "endanger both the public health and the public welfare of current and future generations" and that the "risk and the severity of adverse impacts on public welfare are expected to increase over time."[36]

The Endangerment Finding confirms that $CO_2$ and other GHGs must be regulated under the federal Clean Air Act. Additionally, under the Texas Clean Air Act the Applicant must demonstrate that the emissions from the plant will not endanger the public's health.[37] In light of the EPA's endangerment finding and the undisputed evidence that CC2 will emit $CO_2$, this requirement cannot be met in the absence of a considered analysis of the proposed source's $CO_2$ emissions and their impacts on human health and the environment.

EDF respectfully submits that in light of the EPA's Endangerment Finding the Application and Draft Permit are nevertheless insufficient insofar as they wholly ignore the dangers to human health and environment posed by $CO_2$ emissions. Accordingly, EDF respectfully submits that, in the event that the Application is not denied for the reasons discussed

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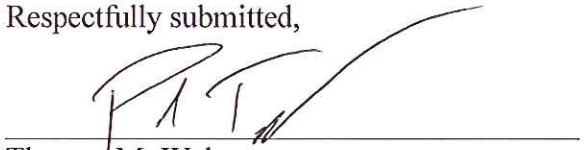
[34] *See* http://epa.gov/climatechange/emissions/ghgrulemaking.html.
[35] *See* http://www.epa.gov/climatechange/endangerment/downloads/FinalFindings.pdf.
[36] *See* Endangerment Finding pg. 1, 17.
[37] Tex. Health & Safety Code Ann. § 382.0518(b).

above, the Application should be remanded to TCEQ for analysis of emissions of $CO_2$ and other GHGs, and that the Applicant should be required to show why the emissions of $CO_2$ and other GHGs from CC2 will not violate either the federal Clean Air Act or the Texas Clean Air Act.

## III. CONCLUSION

In conclusion, EDF respectfully requests that the Commission revise the PFD for the reasons discussed above and deny the Application, or in the alternative remand the Application to address the deficiencies raised by the Protestants.

Respectfully submitted,



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## CERTIFICATE OF SERVICE

This is to certify that on this the 8th day of March, 2010, the foregoing document has been served by hand-delivery, email, facsimile or U.S. Mail to the addressees listed below:

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| 655397.50 | 3194801.50 | 0.81233 | (88071703) | 655397.50 | 3195801.50 | 0.30313 | (88122102) |
| 655397.50 | 3196801.50 | 0.12482 | (88122102) | 655397.50 | 3197801.50 | 0.09913 | (88102123) |
| 654397.50 | 3172801.50 | 1.60104 | (88102607) | 654397.50 | 3173801.50 | 1.18920 | (88101605) |



*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): ES_06 , ES_08 , ES_09 , ES_10 , ES_13 , ES_14 , ES_15 ,
OLDCOALP, NEWCOALP,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PART IN MICROGRAMS/M**3 **

| X-COORD (M) | Y-COORD (M) | CONC | (YYMMDDHH) | X-COORD (M) | Y-COORD (M) | CONC | (YYMMDDHH) |
|---|---|---|---|---|---|---|---|
| 654397.50 | 3174801.50 | 0.90191 | (88121908) | 654397.50 | 3175801.50 | 0.84075 | (88082802) |
| 654397.50 | 3176801.50 | 0.87708 | (88052801) | 654397.50 | 3177801.50 | 1.10767 | (88091324) |
| 654397.50 | 3178801.50 | 0.40204 | (88120708) | 654397.50 | 3179801.50 | 0.67607 | (88081305) |
| 654397.50 | 3180801.50 | 0.67547 | (88073101) | 654397.50 | 3181801.50 | 0.58622 | (88091202) |
| 654397.50 | 3182801.50 | 0.18421 | (88011621) | 654397.50 | 3183801.50 | 0.41377 | (88111402) |
| 654397.50 | 3184801.50 | 0.36031 | (88111402) | 654397.50 | 3185801.50 | 0.55721 | (88082502) |
| 654397.50 | 3186801.50 | 0.82112 | (88102122) | 654397.50 | 3187801.50 | 1.00818 | (88090602) |
| 654397.50 | 3188801.50 | 0.85274 | (88102602) | 654397.50 | 3189801.50 | 0.86559 | (88121903) |
| 654397.50 | 3190801.50 | 0.26306 | (88061003) | 654397.50 | 3191801.50 | 0.18489 | (88060205) |
| 654397.50 | 3192801.50 | 0.12077 | (88060205) | 654397.50 | 3193801.50 | 0.13745 | (88101523) |
| 654397.50 | 3194801.50 | 0.46465 | (88071703) | 654397.50 | 3195801.50 | 0.69106 | (88071703) |
| 654397.50 | 3196801.50 | 0.27745 | (88122102) | 654397.50 | 3197801.50 | 0.12141 | (88122102) |
| 675134.25 | 3179933.00 | 10.18904 | (88032105) | 674471.94 | 3179933.50 | 11.00802 | (88101705) |
| 674054.31 | 3179114.00 | 10.95566 | (88050604) | 673698.38 | 3179530.75 | 9.91230 | (88071602) |
| 673350.38 | 3178588.50 | 20.46802 | (88071703) | 673294.88 | 3178498.75 | 22.21718 | (88071703) |
| 673149.44 | 3178308.00 | 24.72488 | (88090602) | 673021.00 | 3178126.50 | 19.26219 | (88091202) |
| 672995.31 | 3178087.50 | 21.49936 | (88091202) | 672979.56 | 3178051.25 | 22.39525 | (88091202) |
| 672944.06 | 3177965.50 | 23.88865 | (88121905) | 672923.81 | 3177899.75 | 20.98685 | (88091324) |
| 672908.00 | 3177810.00 | 21.30693 | (88091324) | 672890.75 | 3177714.00 | 20.65140 | (88082802) |
| 672860.12 | 3177597.50 | 27.53483 | (88102607) | 672877.06 | 3177591.00 | 28.24990 | (88102607) |
| 672915.94 | 3177593.75 | 29.17145 | (88102607) | 672933.19 | 3177597.50 | 29.49449 | (88102607) |
| 672938.75 | 3177606.75 | 29.30392 | (88102607) | 672939.12 | 3177616.50 | 28.88923 | (88102607) |
| 672952.81 | 3177616.75 | 29.27565 | (88102607) | 672966.88 | 3177603.50 | 30.17053 | (88102607) |
| 672993.56 | 3177607.50 | 30.73475 | (88102607) | 673032.19 | 3177619.75 | 31.35771 | (88102607) |
| 673047.31 | 3177632.50 | 31.30587 | (88102607) | 673078.44 | 3177632.75 | 32.15659 | (88102607) |
| 673090.19 | 3177640.25 | 32.20370 | (88102607) | 673214.06 | 3177640.25 | 35.04796 | (88102607) |
| 673263.19 | 3177644.25 | 35.77271 | (88102607) | 673314.50 | 3177636.75 | 35.95502 | (88102607) |
| 673354.38 | 3177626.75 | 35.24349 | (88102607) | 673383.31 | 3177625.00 | 34.69550 | (88102607) |
| 673399.62 | 3177629.75 | 34.71745 | (88102607) | 673464.31 | 3177621.00 | 33.27913 | (88011624) |
| 673529.44 | 3177624.00 | 35.05932 | (88011624) | 673531.38 | 3177640.25 | 34.41196 | (88011624) |
| 673543.38 | 3177639.75 | 34.67241 | (88011624) | 673583.69 | 3177613.25 | 35.28823 | (88011624) |
| 673604.94 | 3177613.25 | 34.88089 | (88011624) | 673662.94 | 3177609.50 | 32.60270 | (88011624) |



**Attachment A**

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| 673690.94 | 3177611.50 | 30.97938 | (88011624) | 673704.44 | 3177602.75 | 29.76338 | (88011624) |
| 673731.62 | 3177587.00 | 26.77876 | (88011624) | 673829.38 | 3177561.00 | 21.85466 | (88102121) |
| 673852.56 | 3177559.00 | 21.43624 | (88102121) | 673868.00 | 3177562.00 | 21.06416 | (88012403) |
| 673880.00 | 3177550.50 | 21.82126 | (88012403) | 673918.38 | 3177532.00 | 22.06408 | (88012403) |
| 673961.88 | 3177504.75 | 20.58173 | (88012403) | 673980.31 | 3177490.50 | 19.33721 | (88012403) |
| 674007.38 | 3177477.75 | 17.85329 | (88062423) | 674082.06 | 3177410.75 | 18.54533 | (88021307) |
| 674093.00 | 3177411.50 | 18.58525 | (88021307) | 674099.50 | 3177412.75 | 18.57456 | (88021307) |
| 674105.06 | 3177406.75 | 18.87281 | (88021307) | 674107.94 | 3177393.50 | 18.93692 | (88021307) |



**MODELOPTS:
CONC DFAULT ELEV

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): ES_06 , ES_08 , ES_09 , ES_10 , ES_13 , ES_14 , ES_15 ,
OLDCOALP, NEWCOALP,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF PART IN MICROGRAMS/M**3 **

| X-COORD (M) | Y-COORD (M) | CONC | (YYMMDDHH) | X-COORD (M) | Y-COORD (M) | CONC | (YYMMDDHH) |
|---|---|---|---|---|---|---|---|
| 674141.25 | 3177359.75 | 18.79760 | (88021307) | 674172.50 | 3177308.25 | 18.41263 | (88012520) |
| 674184.94 | 3177305.50 | 18.56697 | (88072023) | 674196.25 | 3177307.25 | 18.81416 | (88061004) |
| 674222.81 | 3177301.25 | 19.13650 | (88022502) | 674229.38 | 3177292.00 | 19.10797 | (88022502) |
| 674234.12 | 3177263.75 | 18.80191 | (88022502) | 674236.88 | 3177236.00 | 18.43727 | (88061004) |
| 674251.88 | 3177223.50 | 18.45946 | (88022502) | 674254.00 | 3177197.75 | 18.09399 | (88061004) |
| 674264.50 | 3177197.00 | 18.23140 | (88022502) | 674305.06 | 3177173.25 | 18.37434 | (88022502) |
| 674340.19 | 3177172.00 | 18.76756 | (88021307) | 674358.81 | 3177155.50 | 18.93447 | (88021307) |
| 674394.75 | 3177175.00 | 19.47470 | (88012520) | 674397.94 | 3177196.75 | 19.63472 | (88072023) |
| 674397.38 | 3177208.75 | 19.75749 | (88072023) | 674411.69 | 3177211.50 | 20.07916 | (88072023) |
| 674422.88 | 3177219.25 | 20.26995 | (88072023) | 674428.06 | 3177237.75 | 20.44271 | (88061004) |
| 674435.81 | 3177241.75 | 20.62357 | (88061004) | 674439.50 | 3177248.00 | 20.68763 | (88061004) |
| 674449.38 | 3177250.25 | 20.79807 | (88022502) | 674463.12 | 3177263.25 | 20.70946 | (88022502) |
| 674469.19 | 3177265.00 | 20.78731 | (88120306) | 674482.56 | 3177279.75 | 22.01096 | (88022722) |
| 674484.50 | 3177293.50 | 22.95462 | (88022722) | 674571.31 | 3177359.00 | 31.20851 | (88022722) |
| 674583.00 | 3177352.75 | 31.37259 | (88022722) | 674594.19 | 3177357.75 | 31.40867 | (88022722) |
| 674586.50 | 3177380.00 | 30.57834 | (88022722) | 674604.75 | 3177393.00 | 30.62346 | (88022722) |
| 674615.38 | 3177393.75 | 30.30811 | (88022722) | 674635.25 | 3177413.50 | 28.28041 | (88022722) |
| 674666.19 | 3177410.75 | 26.31182 | (88022722) | 674680.62 | 3177411.50 | 25.98468 | (88030601) |
| 674711.19 | 3177423.00 | 29.32613 | (88030424) | 674738.81 | 3177427.50 | 31.34457 | (88030424) |
| 674770.88 | 3177425.50 | 32.14405 | (88030424) | 674796.88 | 3177417.75 | 32.23090 | (88030424) |
| 674813.81 | 3177417.00 | 32.57363 | (88030424) | 674823.75 | 3177408.50 | 32.26967 | (88030424) |
| 674853.06 | 3177404.75 | 32.43916 | (88030424) | 674890.88 | 3177404.25 | 32.56213 | (88030424) |
| 674920.81 | 3177415.25 | 32.46676 | (88030424) | 674945.12 | 3177413.00 | 32.03780 | (88030424) |
| 674950.06 | 3177455.50 | 29.26317 | (88030424) | 674959.38 | 3177462.25 | 28.67008 | (88030424) |
| 674972.25 | 3177454.25 | 28.57106 | (88030424) | 674991.56 | 3177433.25 | 29.83740 | (88030424) |
| 674995.44 | 3177433.50 | 29.82334 | (88030424) | 674984.00 | 3177500.50 | 25.96357 | (88030424) |
| 675036.62 | 3177552.50 | 23.27229 | (88121306) | 675031.81 | 3177561.00 | 23.18019 | (88121306) |
| 675011.56 | 3177572.00 | 23.51480 | (88121306) | 675006.50 | 3177590.00 | 23.34945 | (88121306) |
| 675014.00 | 3177603.75 | 22.77211 | (88121306) | 675011.62 | 3177617.00 | 22.41807 | (88121306) |
| 675019.50 | 3177639.00 | 21.11123 | (88121306) | 675042.88 | 3177653.00 | 20.12591 | (88021502) |
| 675076.06 | 3177683.50 | 21.36977 | (88082601) | 675128.44 | 3177706.75 | 22.28338 | (88082601) |
| 675161.31 | 3177744.25 | 22.92295 | (88082601) | 675174.62 | 3177751.75 | 22.95122 | (88082601) |
| 675195.38 | 3177768.75 | 22.65861 | (88082601) | 675208.31 | 3177774.50 | 22.26300 | (88082601) |
| 675231.38 | 3177803.00 | 21.09249 | (88082601) | 675283.38 | 3177799.25 | 20.44357 | (88082601) |
| 675446.69 | 3177961.50 | 20.48829 | (88120423) | 675694.81 | 3178213.50 | 14.00992 | (88101905) |
| 675456.88 | 3178946.25 | 14.01172 | (88121302) | 675443.00 | 3178943.25 | 14.23686 | (88121302) |
| 675431.50 | 3178930.75 | 14.30279 | (88121302) | 675408.81 | 3178949.25 | 14.81269 | (88121302) |
| 675421.19 | 3178962.00 | 14.71053 | (88121302) | 675422.06 | 3178972.25 | 14.72599 | (88121302) |
| 675414.69 | 3178975.00 | 14.79958 | (88121302) | 675409.50 | 3179008.25 | 14.68610 | (88121302) |
| 675399.62 | 3179031.00 | 14.42847 | (88121302) | 675393.44 | 3179048.00 | 14.12471 | (88121302) |



**Attachment A**