# ATTACHMENT “B”

## Projected Effect of Project
## On PTE Criteria Pollutants and/or Projected Future Emissions

**Potential-to-Emit**

1. **EXISTING PTE**: As set forth pursuant to the Statement of Basis for the Draft Title V Permit:

"Virtually all of Bonanza plant's emissions come from the main boiler. The potential-to-emit for the main boiler, in tons per year, as listed in form "PTE" and "EMISS" and Section D of the Part 71 operating permit application, amended by email to EPA on March 13, 2013, is as follows:

| Pollutant | Potential-to-emit (tons per year) |
|---|---|
| CO | 503 |
| SO2 | 1,968 |
| NOx | 9,228 |
| PM10 | 574 |
| HAPs | 68 |
| VOC | 70 |

2. **POST-PROJECT PTE:** as a result of the LNB/OFA Project, once the Project is fully complete, installed, and operating, the Potential-to-Emit will be lowered or remain the same for all pollutants, as set forth below:

| Pollutant | Potential-to-emit (tons per year) |
|---|---|
| CO | unchanged |
| SO2 | unchanged |
| NOx | 5,619 |
| PM10 | unchanged |
| HAPs | unchanged |
| VOC | unchanged |

The revised (lower) PTE for NOx is calculated based on the revised enforceable NOx limit requested pursuant to the Application Section 4.0 (a)(ii) of 0.28 lb./MMBtu, as depicted on the attached spreadsheet. Applicant notes that the PTE for NOx may be further reduced, commencing January 1, 2030 in accordance with the provision of Section 4.0(a)(iv) to no greater than 3,000 tons per year, depending upon the occurrence (or non-occurrence) of certain matters set forth pursuant to Section 4.0 (b) (iii), satisfaction of which could render the tpy NOx limit set forth in Section 4.0 (a)(iv) enforceable beginning no sooner than January 1, 2030.

3. **COMPARISON OF ACTUAL (HISTORIC) NOx EMISSIONS TO PROJECTED-ACTUAL EMISSIONS:**

As the data in the attached spreadsheet demonstrate, Bonanza Unit 1 experienced actual average (historic) NOx emissions, on a 24 month rolling basis, during the 60 most recent months of operation prior to the date of this Application equal to:

| **Historic Actual Emissions (Ann'l Avg. tpy on 24 month basis)** | **Date(s)** |
|---|---|
| 7,643 tpy | June 2012 – May 2014 |

As demonstrated, the Post-Project PTE will be significantly lower (5,619 tpy) than the historical actual "baseline" NOx emissions from Bonanza Unit 1.

***Projected Actual Emissions Post-Project***

Furthermore, the projected actual emissions of NOx from Bonanza Unit 1, after the LNB/OFA Project is completed, installed, and operational, is anticipated to be well below the actual "baseline" historic NOx emissions of 7,643 tpy, as shown in the following calculation:

| | |
|---|---|
| Projected Average Max. Heat Input[1] | 39,115,604 MMBtu/yr |
| *Multiplied by* | |
| Enforceable NOx limit (per MNSR request) | 0.28 lb./MMBtu |
| *Equals* | ***5,476 tpy NOx*** |

[1] . The Bonanza Unit 1 heat input used in projecting future actual emissions of NOx is based on the actual highest 24 month annual heat input during the 60 most recent months of operation prior to the date of this Application, which occurred from May 2013 to April 2015 (see attached spreadsheet submitted herewith). In all events, pursuant to the requested annual NOx emission limit set forth in Section 4.0 (a) (iii), actual annual emissions will not exceed 5,700 tpy on a 12-month rolling basis beginning the third calendar month that permitted operations of LNB/OFA commence.