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May 11, 2016

Via Federal Express/Electronic Mail

Todd Anthony Bianco, EFSB Coordinator
RI Energy Facilities Siting Board
89 Jefferson Blvd.
Warwick, RI 02888

Re: Invenergy Docket No. SB-2015-06

Dear Mr. Bianco:

On behalf of Invenergy, enclosed please find an original and ten copies of Invenergy Thermal Development LLC's Responses to The Town of Burrillville's 6th Set of Data Requests.

Please let me know if you have any questions.

Very truly yours,

ALAN M. SHOER
ashoer@apslaw.com

Enclosures

cc: Service List

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD

IN RE: INVENERGY THERMAL DEVELOPMENT LLC's APPLICATION TO CONSTRUCTION THE CLEAR RIVER ENERGY CENTER IN BURRILLVILLE, RHODE ISLAND

DOCKET No. SB-2015-06

INVENERGY THERMAL DEVELOPMENT LLC'S RESPONSES TO THE TOWN OF BURRILLVILLE'S 6th SET OF DATA REQUESTS

Traffic

6-1 With the increase in traffic through densely settled areas, what is the increased risk statistically of accidents and risk of a hazmat spill?

RESPONSE 6-1 As part of the traffic study, traffic increases due to the proposed Clear River Energy Center ("CREC") were estimated for both the construction phase (for which we used the construction phase that generates the most trips) and for the post-construction operational phase when the plant is fully constructed.

Crash data was provided by the Town of Burrillville for the following locations on Route 100:

- Pascoag Main Street
- South Main Street
- Church Street

Crash rates were calculated for Route 100 in Burrillville. The accident rate for a roadway segment represents the number of accidents that occur per million vehicle miles traveled. The accident rates were then applied to the projected traffic conditions for the construction phase and the operational phase of CREC. Assuming that the roadway and adjacent conditions do not change, and that only the traffic volumes are increased, the accident rate would remain consistent in these phases and the increased traffic is likely to result in approximately one additional accident during the construction phase with the highest level of trip generation and approximately one additional accident per three-year period during the operational phase.

To estimate the increased risk of a traffic-related hazmat spill as a consequence of the added traffic from the CREC, methodology based upon research conducted at the New Jersey Institute of Technology was utilized. The formula utilizes the following components:

- SS-The serious spillage rate, which was calculated based upon

crash and traffic data to be 0.0017

- RL-The length of roadway
- AADT-The annual average daily traffic volume
- %HV-The percentage of heavy goods vehicles

Applying the formula to the existing conditions on Route 100 between the Glocester/Burrillville Town line and the intersection of Church Street at Wallum Lake Road, the current probability of a serious spill is 0.22%. When the CREC is complete and operational, the added truck traffic will consist of a low volume of ammonia (approximately one delivery every two weeks) and oil trucks, which are only expected to be needed for a couple of days of the year when temperatures necessitate. With the increased truck traffic from the operational condition of the CREC, the probability of a serious spill does not increase and continues to be 0.22%.

During the construction phase with the heaviest volume of traffic, the probability of a serious spill increases to 0.23% with an estimated additional 69 vehicles per day of truck traffic. The increase of risk for a serious spill is 0.01% which is very low.

RESPONDENT: Maureen Chlebek, McMahon Associates

DATE: May 11, 2016

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD

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INVENERGY THERMAL DEVELOPMENT LLC'S RESPONSES TO THE TOWN OF BURRILLVILLE'S 6th SET OF DATA REQUESTS

6-2 What is the emergency response plan should a large tanker truck or other tractor trailer be involved in an accident and lose their cargo?

RESPONSE 6-2: In addition to notifying the local and state police, the Rhode Island Department of Environmental Management ("RIDEM") Office of Emergency Response is contacted in the event of an environmental emergency. The RIDEM Hot-line can be contacted any time for any emergency. The delivery companies and CREC will work cooperatively with RIDEM in these events.

Furthermore, there are federal and state regulations that must be followed in order to transport hazardous materials. The US Department of Transportation Federal Motor Carrier Safety Administration mandates that the following information must be carried when transporting hazardous materials:

- The emergency response telephone number
- The emergency response information on the shipping paper that includes the description of material, immediate hazards to health, immediate methods for handling small or large fires and spills or leaks, preliminary first aid measures.
- All hazardous material transporters must have an appropriate placard on the outside of the vehicle.

Furthermore, the transport of materials to the proposed site is achieved along routes that allow hazardous material transport. Route 100 has good horizontal and vertical geometry and has wide shoulders. There are designated routes in Rhode Island that restrict the transport of hazardous materials and these routes are not in the project vicinity and not along the logical route to the site.

RESPONDENT: Maureen Chlebek, McMahon Associates

DATE: May 11, 2016

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
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IN RE: INVENERGY THERMAL DEVELOPMENT LLC's APPLICATION TO CONSTRUCTION THE CLEAR RIVER ENERGY CENTER IN BURRILLVILLE, RHODE ISLAND

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INVENERGY THERMAL DEVELOPMENT LLC'S RESPONSES TO THE TOWN OF BURRILLVILLE'S 6th SET OF DATA REQUESTS

6-3 Has any consideration been given to improving Jackson School House Road or Buck Hill Road and to use one as a bypass of the villages of Chepachet and Pascoag?

RESPONSE 6-3: In evaluating the surrounding street system, anticipated routes were identified for truck traffic and employee traffic. The truck traffic is expected to utilize the higher functional classification of roadways that are designed to handle higher levels of traffic. Jackson Schoolhouse Road is a winding, narrow roadway, often less than 24 feet in width, includes a portion of unpaved roadway, and generally abuts residential land use. Buck Hill Road is also winding and narrow (generally less than 26 feet wide) with adjacent residential land use. These two roadways are not preferred routes for truck traffic due to the narrow widths and curvature of the roadways.

There is potential that employees of the CREC may use these roadways if they originate from points west of the area. Using journey to work data, only 10% of the employment base is likely to be located in an area with a potential to use these roadways and this corresponds to approximately three additional vehicles in the peak periods when the development is fully built and occupied, most of which is likely to be passenger vehicles. During construction approximately 30 vehicles could potentially utilize Jackson Schoolhouse Road during both peak hours. It should be noted that the construction period is for a short duration. Given the small increase in traffic, these routes were not identified as candidates for roadway improvements.

RESPONDENT: Maureen Chlebek, McMahon Associates

DATE: May 11, 2016

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
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6-4 If Route 44 and 100 are the primary trucking routes for construction, what are the contingencies for compensation should homes be damaged by the impact of the truck traffic?

RESPONSE 6-4: A roadway assessment has been conducted to assess the current conditions of the construction trucking routes. The assessment focuses on Route 100 in Burrillville and Glocester. An assessment of Route 44 was not conducted due to its increased distance to the site and since the volume of trucks accessing the site will be less significant compared to the overall truck volumes experienced daily on Route 44.

The assessment will serve as a baseline for comparison of Route 100 roadway conditions after construction is completed. Roadway conditions will be monitored before, during and after construction in order to ensure that pavement conditions do not exist that could lead to damage to adjacent homes. The assessment is being coordinated with the Rhode Island Department of Transportation and coordination will continue during the construction cycle.

RESPONDENT: Maureen Chlebek, McMahon Associates

DATE: May 11, 2016

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
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INVENERGY THERMAL DEVELOPMENT LLC'S RESPONSES TO THE TOWN OF BURRILLVILLE'S 6th SET OF DATA REQUESTS

6-5 Is there a plan to repair roads damaged by traffic from construction?

RESPONSE 6-5: A baseline inventory of pre-construction roadway conditions is already underway, and is focused on Route 100 in Burrillville and Glocester. Coordination has been initiated with the Rhode Island Department of Transportation ("RIDOT") regarding the assessment. Upon completion of construction, any further deterioration or damage beyond what would normally be expected will be assessed in coordination with RIDOT.

RESPONDENT: Maureen Chlebek, McMahon Associates

DATE: May 11, 2016

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
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INVENERGY THERMAL DEVELOPMENT LLC'S RESPONSES TO THE TOWN OF BURRILLVILLE'S 6th SET OF DATA REQUESTS

6-6 Where is the proposed laydown area? Has this location and its potential impact been included in the traffic studies?

RESPONSE 6-6: A laydown area is proposed within the Clear River site. The traffic study will include an evaluation of sight distance at the site driveway. There is potential to use an off-site laydown area during construction. A number of sites have been investigated. At this point, the off-site laydown area is likely to be at either the Port of Providence (35 Terminal Road, Providence, RI) or Quonset Development Corporation (QDC 95 Cripe Street, North Kingstown, RI).

RESPONDENT: Maureen Chlebek, McMahon Associates

DATE: May 11, 2016

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
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INVENERGY THERMAL DEVELOPMENT LLC'S RESPONSES TO THE TOWN OF BURRILLVILLE'S 6th SET OF DATA REQUESTS

Construction Schedule

6-7 Please describe in detail the planned start and end times of construction for each day as well as planned workdays (Business days M-F or full week Sun-Sat).

RESPONSE 6-7 The regular shift for craft will be between the hours of 7:00am-5:30pm from Monday to Friday. It is customary for the contractor's staff to be at the site 30 minutes prior to starting the shift and 30 minutes after the shift is complete. Working over the weekends (Saturdays) will take place occasionally during the peak of construction to make up for lost time due to inclement weather. There will be a small crew of approximately 25 tradesmen working the swing shift at the peak of construction. This shift will last between the hours of 5:30pm-3:30am from Monday to Friday.

RESPONDENT: Amit Nadkarni, Invenergy Thermal Development, LLC

DATE: May 11, 2016

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
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Noise

6-8 Please explain in detail how the adjacent gas compression station noise levels will impact the noise levels of the power plant (what will the projected combined noise levels be)?

RESPONSE 6-8 Noise levels for the Burrillville Compressor Station ("BCS") are estimated to range from 43 to about 51 dBA depending on load conditions at BCS. The maximum noise level produced by CREC will not exceed 43 dBA at this same location. As such, CREC's maximum noise level (43 dBA) is 8 decibels lower than BCS's maximum noise level (51 dBA). With Clear River Energy Center ("CREC") operating at maximum load (43 dBA) and BCS operating at maximum load (51 dBA), the combined noise level will be 52 dBA or 1 decibel higher than without CREC operating. A one decibel increase is barely perceptible under laboratory conditions. With CREC operating at maximum load (43 dBA) and BCS operating at low loads (43 dBA), the combined noise level will be 46 dBA or 3 decibels higher than without CREC. This evaluation is for the residences along the Wallum Lake Road.

RESPONDENT: Mike Theriault, Michael Theriault Acoustics, Inc.

DATE: May 11, 2016

IN RE: INVENERGY THERMAL DEVELOPMENT LLC's APPLICATION TO CONSTRUCTION THE CLEAR RIVER ENERGY CENTER IN BURRILLVILLE, RHODE ISLAND

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INVENERGY THERMAL DEVELOPMENT LLC'S RESPONSES TO THE TOWN OF BURRILLVILLE'S 6th SET OF DATA REQUESTS

Water

6-9 Explain in detail the level and frequency of testing for adjacent water sources (to well 3A) for MTBE contaminates to ensure the extraction of water from well 3A does not cause the pollution to spread to other water sources.

RESPONSE 6-9 RIDEM and others have performed extensive sampling of groundwater, monitoring wells to delineate the MTBE impacts to groundwater in the area of the Main Street Mobil property and Pascoag Utility District's ("PUD") Well 3A. The areas impacted by the MTBE contamination have been well defined as a result of this extensive sampling. RIDEM has performed multiple pumping tests to assess the effect of the operation of Well 3A on the delineated areas of contamination. The results of the pumping tests demonstrated that the operation of Well 3A will remove contamination from the aquifer and will not spread the contamination to areas that are not currently impacted or to areas that were not historically impacted.

In pre-application meetings for the project, RIDEM has stated that it will require further pump testing to reconfirm Well 3A capabilities. RIDEM will also require that monitoring be conducted of the water levels and groundwater quality in the existing monitoring wells surrounding Well 3A prior to, during and after the pump test. Invenergy Thermal Development LLC ("Invenergy") and PUD will submit a test protocol to RIDEM for approval, outlining the level and frequency of groundwater monitoring which will be conducted prior to and during the pump test. The results of the pump test will be submitted to RIDEM for review. Based on the results of the pump test, it is anticipated that RIDEM will require PUD to continue monitoring the water levels and the groundwater quality in the surrounding wells on an ongoing basis to ensure that the extraction of water from Well 3A is not causing impacts to groundwater volume or quality in the surrounding area.

RESPONDENT: Mike Feinblatt, ESS Group, Inc.

DATE: May 11, 2016

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INVENERGY THERMAL DEVELOPMENT LLC'S RESPONSES TO THE TOWN OF BURRILLVILLE'S 6th SET OF DATA REQUESTS

6-10 Explain in detail your remediation plan should the contamination from well 3A spread to surrounding water sources/areas.

RESPONSE 6-10 Based on the work previously completed by RIDEM and others, it is not expected that any contamination from Well 3A will migrate or spread to areas that are not currently impacted. There are no other public supply wells located near the delineated groundwater impact areas associated with the Main Street Mobil property.

The extensive monitoring of the water levels and groundwater quality in the surrounding monitoring wells required prior to and during the Well 3A pump test by RIDEM will demonstrate that the contamination from Well 3A will not spread to surrounding areas during use of the well. RIDEM will only approve the use of the well if such a demonstration is made. RIDEM will require PUD to continue to monitor the water levels and the groundwater quality in the surrounding wells on an ongoing basis to ensure that the extraction of water from Well 3A is not causing impacts to groundwater volume or quality in the surrounding area.

RESPONDENT: Mike Feinblatt, ESS Group, Inc.

DATE: May 11, 2016

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
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INVENERGY THERMAL DEVELOPMENT LLC'S RESPONSES TO THE TOWN OF BURRILLVILLE'S 6th SET OF DATA REQUESTS

6-11 How does Invenergy intend to overcome the court order shutting down Pascoag well 3 and 3A?

RESPONSE 6-11 The January 15, 2002 Court Order ("Court Order") states that Wells No. 3 and 3A may only be used for remediation of contamination as directed by the Director of Health, the Department of Environmental Management, Water Resources or other appropriate State Officials but in no event shall the wells be used for potable water supply. Invenergy is proposing to install a treatment system to remediate the contamination in Well 3A and then use the remediated water, which will be treated to drinking water standards. This water will not be used for drinking water. It will be used as process water within the facility via a dedicated water pipeline.

PUD will own and operate the proposed treatment system and believes that the proposed use of Well 3A is consistent with the Court Order. Invenergy and PUD have attended several pre-application meetings with various representatives of RIDEM in both the Water Resources and Site Remediation divisions, as well as with the Chief of the Office of Drinking Water Quality at the Rhode Island Department of Health ("RIDOH"). Both RIDEM and the RIDOH have endorsed PUD's and Invenergy's proposal to remediate the contamination in Well 3A provided that the proper assessments are conducted to ensure that its use will not cause any further impacts to water availability or groundwater quality in the surrounding area. Invenergy and PUD will work with RIDEM and the RIDOH to ensure that the proper assessments are conducted with the understanding that approval of the use of Well 3A for CREC by RIDEM and the RIDOH will not be issued without such assurances.

RESPONDENT: Mike Feinblatt, ESS Group, Inc.

DATE: May 11, 2016

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
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Sewer

6-12 What is the second option for water discharge if the Burrillville Sewer Department can't handle, treat, or discharge the contaminated water?

RESPONSE 6-12 The waste water discharged to the sewer system will meet the permissible limits that will be laid out in the RIDEM waste water discharge permit. In the event that the water is deemed unsuitable for discharge, Invenergy will evaluate the option of installing a Zero Liquid Discharge System ("ZLD"). There are several means and methods, and sub systems within the ZLD system that can be employed to eliminate the need to discharge any water to the Burrillville Sewer Department.

Based on our evaluation plan of pre-treating the water prior to being transported to the site and further treatment and polishing at the plant to obtain the desired water quality level, Invenergy does not feel the need to explore the option of a ZLD at this point of time.

RESPONDENT: Amit Nadkarni, Invenergy Thermal Development, LLC

DATE: May 11, 2016

IN RE: INVENERGY THERMAL DEVELOPMENT LLC's APPLICATION TO CONSTRUCTION THE CLEAR RIVER ENERGY CENTER IN BURRILLVILLE, RHODE ISLAND

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Air

6-13 Please identify the anticipated combined air pollution levels in the immediate area when considering this proposed power plant, the emissions generated by the adjacent gas plant, and Ocean State Power.

RESPONSE 6-13 The EPA has established the National Ambient Air Quality Standards ("NAAQS"), which are the concentrations of criteria pollutants in the ambient air that have been determined through extensive health studies to be safe for human health and the environment, including the most vulnerable of the population, which a margin of safety. As required by RIDEM, Invenergy has completed an air quality impact analysis to demonstrate that the ambient air impact concentrations resulting from the simultaneous operation of the CREC emission sources, the emission sources at the Algonquin Compressor Station and the emissions sources at Ocean State Power, when combined with existing ambient concentrations, will not cause an exceedance of any NAAQS.

The methodology used for this analysis and the results are summarized in the Air Dispersion Modeling Report for the project submitted to RIDEM on October 30, 2015. The analysis was completed using AERMOD, an EPA refined air dispersion model approved for use by RIDEM. All emission sources were modeled at full operation and at their worst-case emission rate of each pollutant. The model was run at all hourly meteorological conditions that have occurred over the most recent five-year period for which such data is available, in this case 2010-2014. A polar receptor grid was established out to 50 kilometers with receptors located at 25 meter intervals out to 1 km, at 100 meter intervals out to 2 km, at 200 meter increments out to 5 km, at 500 meter increments out to 10 km, and at 1,000 meter increments out to 50 km. The model then predicted the maximum ambient air impact concentrations resulting from all sources operating simultaneously, at each hourly meteorological condition and at every receptor location within the receptor grid to determine the maximum predicted total impact concentration for each pollutant and averaging period.

The results of the project's NAAQS compliance determination were detailed in Table 15 of the report and are summarized below (all values are in

micrograms per cubic meter):

Criteria Pollutant	Averaging Period	Predicted Impact	Background Conc.	Total Conc.	NAAQS
CO	1-hour	64	2,346	2,410	40,000
CO	8-hour	47	1,495	1,542	10,000
NO_2	1-hour	36	80	116	188
NO_2	Annual	2	20	22	100
SO_2	1-hour	40	123	163	195
SO_2	3-hour	44	45	89	1,300
SO_2	24-hour	19	21	40	365
SO_2	Annual	0.4	3.7	4.1	80
PM_{10}	24-hour	8	17	25	150
$PM_{2.5}$	24-hour	5	13	18	35
$PM_{2.5}$	Annual	0.7	5.2	5.9	12

As shown above, CREC will not cause an exceedance of the NAAQS at any location beyond its property line, even when operating simultaneously with the emissions sources at the Algonquin Compressor Station and at Ocean State Power. Note that the results presented above represent the maximum predicted total impact concentration at a single receptor location at a single hourly meteorological condition for each pollutant and averaging period. The margin of compliance with the NAAQS will be greater at every other receptor location and during every other hourly meteorological condition, providing further assurance that air quality levels in the area surrounding the facility will be at levels which have been deemed safe by the EPA during CREC operation.

RIDEM has established a list of air toxic compounds and the concentration levels of each air toxic which are safe for public health and the environment (Acceptable Ambient Levels or "AALs") in RIDEM Air Pollution Control Regulation No. 22. Invenergy was required to apply the results of the air quality impact analysis described above to its emissions of air toxic compounds. As detailed in Table 16 of the Air Dispersion Modeling Report, the worst-case emission rates of air toxic compounds from the CREC will not cause an exceedance of any RIDEM AAL beyond its property line. (Table 16 is attached as **Exhibit 1**.) The results presented in

IN RE: INVENERGY THERMAL DEVELOPMENT LLC's APPLICATION TO CONSTRUCTION THE CLEAR RIVER ENERGY CENTER IN BURRILLVILLE, RHODE ISLAND

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Table 16 are for the single receptor location and hourly meteorological condition at which the highest impacts were predicted for each pollutant and averaging period. The project impact concentrations will be lower than the values presented in Table 16 at every other receptor location and hourly meteorological condition during CREC operation.

RIDEM has also established the "Guidelines for Assessing Health Risks from Proposed Air Pollution Sources." Invenergy was required to complete a multi-pathway human health risk assessment for the CREC in accordance with the RIDEM Guideline. The results of the assessment are detailed in the CREC Health Risk Assessment Report submitted to RIDEM on January 27, 2016. As detailed in the report, the results of the health risk assessment completed for the CREC project met all of the applicability criteria of the RIDEM Guideline, demonstrating that any short or long term health risks which could be associated with exposure to the all of the pollutants that could be emitted from the project are within the acceptable levels established by RIDEM to be protective of human health.

RESPONDENT: Mike Feinblatt, ESS Group, Inc.

DATE: May 11, 2016

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD

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6-14 How does the height of the "smokestack" affect emissions disbursement and, specifically, the abutting properties?

RESPONSE 6-14 Emissions from a stack mix with the ambient air and become more dilute before reaching the ground. There are many factors that influence the degree of dilution, including the stack height, velocity and temperature, as well as ambient conditions, such as the temperature, relative humidity, wind direction and wind velocity at the stack exit. A higher stack will result in a higher plume, which will travel a longer distance to reach the ground at a point further away from the stack, allowing more time for dilution and will result in lower ground level concentrations.

Invenergy conducted a turbine stack height optimization as part of the air dispersion modeling analysis completed for the project. The purpose of this optimization was to determine a range of turbine stack heights at which compliance with all applicable air quality standards could be achieved, while still minimizing CREC's visual impacts to the surrounding community and its potential impact on air traffic navigation from nearby airports and airfields.

The results of the optimization confirmed that taller turbine stacks would decrease the air impacts to abutting properties but would increase CREC's visual impact while shorter stacks would increase air impacts to abutting properties but decrease the visual impact further, which is already minimal. The proposed CREC turbine stack height (200 feet) was the height at which it was determined that air quality impacts and visual impacts to the surrounding community would be best balanced, while still achieving full compliance with all applicable air quality standards. The turbine stack is approximately the same height as the adjacent cell tower, which is 190 feet.

RESPONDENT: Mike Feinblatt, ESS Group, Inc.

DATE: May 11, 2016

INVENERGY THERMAL DEVELOPMENT LLC
By its Attorneys,

/s/Alan M. Shoer
Alan M. Shoer, Esq. (#3248)
Richard R. Beretta, Jr. Esq. (#4313)
Nicole M. Verdi, Esq. (#9370)
ADLER POLLOCK & SHEEHAN, P.C.
One Citizens Plaza, 8th Floor
Providence, RI 02903-1345
Tel: 401-274-7200
Fax: 401-751-0604
Dated: May 11, 2016

CERTIFICATE OF SERVICE

I hereby certify that on May 11, 2016, I delivered a true copy of the foregoing responses to the Town of Burrillville's Data Requests via electronic mail to the parties on the attached service list.

/s/ Alan M. Shoer

EXHIBIT 1

Table 16: Air Toxics Modeling Results Summary

Emission Source(s):	Gas Turbines	Gas Turbines	HRSG Duct Burners	Auxiliary Boiler	Dewpoint Heater	Diesel Generator	Fire Pump	RIDEM APCR No. 22 Acceptable Ambient Levels		
Number of Sources:	2	2	2	1	1	1	1			
Fuel Fired:	Natural Gas	ULSD	Natural Gas	Natural Gas	Natural Gas	ULSD	ULSD			
Maximum Unit Heat Input (MMBtu/hr):	3,393	3,507	721	140.6	15.0	19.5	2.1			
Annual Operation (hrs/yr):	8,040	720	8,040	4,576	8,760	300	300	1-hour	24-hour	Annual
Emission Rate:	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	µg/m^3	µg/m^3	µg/m^3
1,3-Butadiene	2.92E-04	1.12E-02					8.21E-05			0.03
Acetaldehyde	2.71E-02					4.91E-04	1.61E-03			0.5
Acrolein	4.34E-03					1.54E-04	1.94E-04	0.2		0.02
Ammonia	9.20E+00	1.01E+01						1,000	100	70
Arsenic		3.24E-04	2.83E-04	2.76E-05	2.94E-06			0.2		0.0002
Benzene	8.14E-03	8.42E-03	2.97E-04	2.89E-04	3.09E-05	1.51E-02	1.96E-03	30	20	0.1
Beryllium		2.17E-03	1.70E-05	1.65E-06	1.76E-07				0.02	0.0004
Cadmium		3.60E-05	1.56E-03	1.52E-04	1.62E-05				0.1	0.0006
Cobalt			1.19E-04	1.16E-05	1.24E-06					0.001
Formaldehyde	1.48E-01	1.62E-01	1.06E-02	1.03E-02	1.10E-03	1.54E-03	2.48E-03	50	40	0.08
Lead		5.39E-03	7.07E-04	6.89E-05	7.35E-06					0.008
Manganese		1.98E-03	5.37E-04	5.24E-05	5.59E-06				0.05	0.04
Mercury		7.22E-05	3.68E-04	3.58E-05	3.82E-06			2	0.3	0.009
Naphthalene	8.82E-04	2.45E-02	8.62E-05	8.41E-05	8.97E-06	2.54E-03	1.78E-04		3	0.03
Nickel		1.04E-02	2.97E-03	2.89E-04	3.09E-05			6	0.2	0.004
Propylene Oxide	1.97E-02							3,000		0.3
Sulfuric Acid	3.69E+00	4.17E+00						100		1
Vanadium			3.25E-03	3.17E-04	3.38E-05			0.2		

Maximum Modeled Impacts (µg/m^3/g/sec)	1-hour	24-hour	Annual
GT/HRSG-1 & 2 (Natural Gas)	3.21	2.09	0.16
GT/HRSG-1 & 2 (ULSD)	3.08	2.00	0.15
Auxiliary Boiler	146.25	49.85	4.15
Dewpoint Heater	209.52	62.85	7.66
Diesel Generator	195.64	47.04	6.34
Fire Pump	440.05	214.51	17.32

GT.HRSG firing Natural Gas				AAL Compliant? (Yes/No)		
Maximum Modeled Impacts (µg/m^3)	1-hour	24-hour	Annual	1-hour	24-hour	Annual
1,3-Butadiene	4.67E-03	2.30E-03	2.84E-05			Yes
Acetaldehyde	1.12E-01	5.36E-02	6.25E-04			Yes
Acrolein	1.63E-02	7.30E-03	9.74E-05	Yes		Yes
Ammonia	3.72E+00	2.43E+00	1.82E-01	Yes	Yes	Yes
Arsenic	7.01E-04	2.71E-04	1.60E-05	Yes		Yes
Benzene	4.90E-01	1.47E-01	8.34E-04	Yes	Yes	Yes
Beryllium	4.19E-05	1.62E-05	4.23E-06		Yes	Yes
Cadmium	3.86E-03	1.49E-03	8.54E-05		Yes	Yes
Cobalt	2.95E-04	1.14E-04	6.52E-06			Yes
Formaldehyde	4.58E-01	1.91E-01	7.22E-03	Yes	Yes	Yes
Lead	1.75E-03	6.77E-04	4.69E-05			Yes
Manganese	1.33E-03	5.15E-04	3.24E-05		Yes	Yes
Mercury	9.09E-04	3.52E-04	2.02E-05	Yes	Yes	Yes
Naphthalene	7.47E-02	2.07E-02	1.69E-04		Yes	Yes
Nickel	7.34E-03	2.84E-03	1.78E-04	Yes	Yes	Yes
Propylene Oxide	7.97E-03	5.19E-03	3.57E-04	Yes		Yes
Sulfuric Acid	1.49E+00	9.73E-01	7.32E-02	Yes		Yes
Vanadium	8.05E-03	3.12E-03	1.78E-04	Yes		