Another Courtesy Draft 8/7/2025

Friday, August 8, 2025



Re: Pre Draft for Permit App 13-3708

1 message

To: N	rews, Edward S <edward.s.andrews@wv.gov> Thu, Aug 7, 2025 at 8:58 A Michael Dearing <michael.dearing@erm.com>, William Calhoun <jack.calhoun@fidelisinfra.com>, Anand Rathinasamy and.rathinasamy@erm.com></jack.calhoun@fidelisinfra.com></michael.dearing@erm.com></edward.s.andrews@wv.gov>
Mi	chael,
At	tached is an updated pre-draft for you to review as a courtesy.
Sh	nould you have any questions or concerns, please let me know.
Th	nanks,
Ed	I
Ed	dward Andrews, P.E.
En	ngineer
W	VDEP/Division of Air Quality
30	4-414-1244
60	1 57th Street, SE
Ch	narleston, WV 25304
Or	n Wed, Aug 6, 2025 at 4:53 PM Michael Dearing < Michael. Dearing@erm.com > wrote:
	Ed,
	Attached is the updated throughput gallons on the attachment L for the water water treatment plant as we discussed on the call.
	Thanks



Michael Dearing

Principal Consultant, Scientist

Charleston (WV)

erm.com

O +1-(612)-347-7144

C +1-(304)-654-2227

From: Andrews, Edward S <edward.s.andrews@wv.gov>

Sent: Monday, July 21, 2025 2:51 PM

To: Michael Dearing <Michael.Dearing@erm.com>; Anand Rathinasamy <anand.rathinasamy@erm.com>

Cc: William Calhoun < jack.calhoun@fidelisinfra.com>

Subject: Pre Draft for Permit App 13-3708

EXTERNAL MESSAGE
Michael and Anand,
Attached is a pre-draft for you to review as a courtesy.
Should you have any questions or concerns, please let me know.
Thanks,
Ed
Edward Andrews, P.E.

Engineer

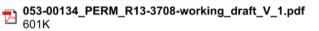
WVDEP/Division of Air Quality

304-414-1244

601 57th Street, SE

Charleston, WV 25304

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Wastewater Treatment update 8/6/2025

Thursday, August 7, 2025 8:4

8:46 AM



RE: Pre Draft for Permit App 13-3708

1 message

Michael Dearing < Michael. Dearing@erm.com>

Wed, Aug 6, 2025 at 4:53 PM

To: "Andrews, Edward S" <edward.s.andrews@wv.gov>, Anand Rathinasamy <anand.rathinasamy@erm.com>Cc: William Calhoun <jack.calhoun@fidelisinfra.com>

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Thanks



Michael Dearing

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From: Andrews, Edward S <edward.s.andrews@wv.gov>

Sent: Monday, July 21, 2025 2:51 PM

To: Michael Dearing <Michael.Dearing@erm.com>; Anand Rathinasamy <anand.rathinasamy@erm.com>

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Subject: Pre Draft for Permit App 13-3708

EXTERNAL MESSAGE
Michael and Anand,
Attached is a pre-draft for you to review as a courtesy.
Should you have any questions or concerns, please let me know.
Thanks,
Ed
Edward Andrews, P.E.
Engineer
WVDEP/Division of Air Quality
304-414-1244
601 57th Street, SE
Charleston, WV 25304

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Comment 8/4/2025

Monday, August 4, 2025

8:07 AM



RE: Pre Draft for Permit App 13-3708

1 message

Michael Dearing <Michael.Dearing@erm.com> Fri, Aug 1, 2025 at 4:25 PM To: "Andrews, Edward S" <edward.s.andrews@wv.gov>, Anand Rathinasamy <anand.rathinasamy@erm.com> Cc: William Calhoun <jack.calhoun@fidelisinfra.com>

Ed,

The only thing to jumped out to us was the wastewater treatment plant throughput limit. We would like to request it be increased to 646 gpm or 930,240 gpd.

- 9.1.7. The following requirements are specific to the wastewater treatment plant identified as 127-PKG-001:
 - a. HCl emissions from the collection of process units and fugitive sources associated with the wastewater treatment plant shall not exceed 0.57 tons per year on a 12-month rolling total basis.
 - b. Sulfuric acid mist (H2SO4) emissions from the collection of process units and fugitive sources associated with the wastewater treatment plant shall not exceed 2.79 tons per year on a 12-month rolling total basis.
 - c. The wastewater treatment plant shall not process/treat more than 4,152 gallons per day.

Thanks



Michael Dearing

Principal Consultant, Scientist

Charleston (WV)

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C +1-(304)-654-2227

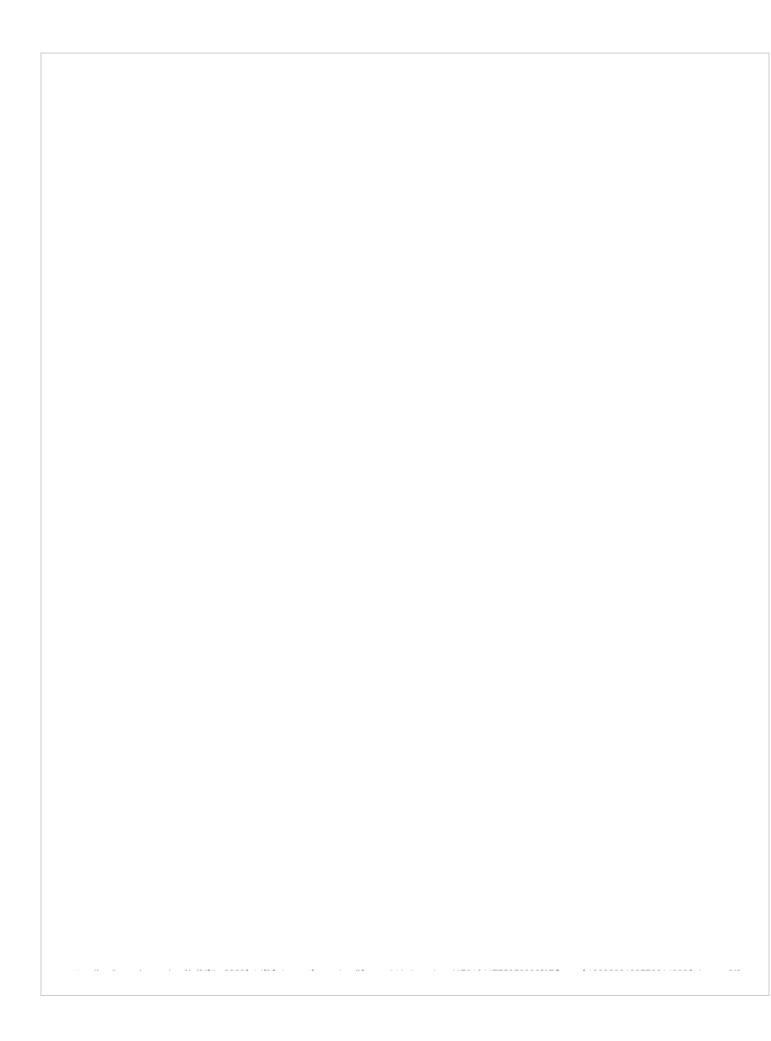
053-00134 IPR 13-3708 Page 9

From: Andrews, Edward S <edward.s.andrews@wv.gov> Sent: Monday, July 21, 2025 2:51 PM To: Michael Dearing <Michael.Dearing@erm.com>; Anand Rathinasamy <anand.rathinasamy@erm.com> Cc: William Calhoun < jack.calhoun@fidelisinfra.com> Subject: Pre Draft for Permit App 13-3708 EXTERNAL MESSAGE Michael and Anand, Attached is a pre-draft for you to review as a courtesy. Should you have any questions or concerns, please let me know. Thanks, Ed Edward Andrews, P.E. Engineer WVDEP/Division of Air Quality 304-414-1244 601 57th Street, SE

This e-mail and any attachments may contain proprietary, confidential and/or privileged information. No confidentiality or privilege is waived or lost by any transmission errors. This communication is intended solely for the intended recipient, and if you are not the intended recipient, please notify the sender immediately, delete it from your system and do not copy, distribute, disclose, or otherwise act upon any part of this email communication or its attachments. To find out how the ERM Group manages personal data please review our Privacy Policy

053-00134 IPR 13-3708 Page 10

Charleston, WV 25304



Complete App 6/23/2025

Monday, June 23, 2025 11:55 AM



Complete App Email for R13-3708

1 message

Andrews, Edward S <edward.s.andrews@wv.gov>
To: William Calhoun <jack.calhoun@fidelisinfra.com>

Mon, Jun 23, 2025 at 11:00 AM

Cc: Michael Dearing Michael.Dearing@erm.com, Anand Rathinasamy anand.rathinasamy@erm.com, Joseph R Kessler Joseph R Kessler@wv.gov

RE: Application Status: Complete MGS CNP 1, LLC Permit Application R13-3708 Plant ID No. 053-00134

Mr. Calhoun,

Your application for a biomass boiler was received by this Division of Air Quality on February 24, 2025, and assigned to the writer for review. Upon review of said application, it has been determined that the application is complete and, therefore, the statutory review period **90** commenced on June 23, 2025.

This determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit determination. Please note that any additional information requests may pause the statutory review clock.

Should you have any questions, please contact Ed Andrews at (304) 414-1244 or reply to this email.

Edward Andrews, P.E. Engineer WVDEP/Division of Air Quality 304-926-0499 Ext 41244 601 57th Street, SE Charleston, WV 20304 Monday, June 23, 2025 7:36 AM









6-6-25 Incomplet... MGB CNP 1, LLC 109 Post Cuis Lame, Suite 140 Housson, TX 77024 June 18, 2025 Laura M. Crowder, Director W. Capartment of Environmental Postection (WDEP) Division of Art Quality (DAQ) 501 57" Street SE Charleston, WV 25304 Re Application Status: Incomplete M/S CNP 1, LLC/IBECCS Plant Permit Application No. R13-3708 Plant ID No. 083-00134 Ms. Crowder, Please find our responses to each of your questions/comments in the incomplete application notice sent to MISS CNP 1, LLC (MIOS) on June 6° 2025. MIOS has provided a response in italics to address all the questions surrounding the application for the BECCS plant. The following items will be attached to address comments.

• Attachment N - Updated emission calculations

• Attachment L - Engine Date Sheet

• Emission Specification for the Fire Pump Engine. If you have additional questions, please do not hesitate to contact us. Sincerely. Jack Calbour. Vice President

#FIDELIS

MGS CNP 1, LLC 109 Post Dak Lane, Suite 140 Houston, TX 77024

RE: Application Status: Incomplete MGS CNP 1, LLC/BECCS Plant Permit Application No. R13-3708 Plant ID No. 053-00134

Mr. Calhoun:

Your application for a construction permit for a steam to electric generation facility was received by this Division on February 24, 2025, and assigned to the writer for review. It has been determined that the application as submitted is incomplete based on the following items:

- strained that the application as whemitted is incomplish based on the following items:

 The emission of non methans bythrecurbous (NMEO) plus nitrogen oxides (NOx) presented in the application from the emergency engine for the fravouter pump (Emission Unit ID 129-9-940) indicate potentially non-compliance with the NMEO: + NOx standard for stationary five pump engines of Subpart IIII to 40/3786/ Pleasu apidate your application accordingly.
 Antachement I have been apidated environment for the groupe edgine information.
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 The environm prefixation for the five pump engine has been provided to demonstrate compliance NNSPS IIII.

Please address the above issue by June 23, 2025. Application review will not commence until the application has been deemed to be technically complete. Failure to respond to this request in a timely manner may result in the denial of the application.

Should you have any questions, please contact Ed Andrews at (304) 926-0499 ext. 41244 or reply to this email.

MELCAPO U.C.

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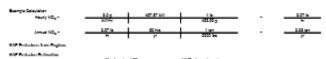
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Clarke Model		CI	8H0-UFA	D42		
Derived Rating	458	kW	614	hp		
Rated Speed	1760	rpm	1760	rpm		
NOx	3.04	g/kW-hr	2.27	g/hp-hr		
HC	0.11	g/kW-hr	0.08	g/hp-hr		
PM	0.113	g/kW-hr	0.085	g/hp-hr		
CO	3.30	g/kW-hr	2.46	g/hp-hr		
Certified Rating	52	2 kW	70	0 hp		
Rated Speed	210	0 rpm	210	0 rpm		
NOx	4.2	5 g/kW-hr	3.17	g/hp-hr		
HC	0.0	7 g/kW-hr	0.05	g/hp-hr		
PM	0.12	2 g/kW-hr	0.09	g/hp-hr		
CO	0.5	4 g/kW-hr	0.40 g/hp-hr			

- CO 0.54 g/kW-hr 0.40 g/hp-hr
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 4-tained Nominal Emissions data for the fore pump noting cycle emissions are shown above.

 4-best engines are certified to the variable speed 81 Mode C1 cycle that can be used in either constant or variable speed applications.

 7-this information to Exterplific Confidential Unsudnessed distribution of this information beyond its intended audience is prohibited.

INC RE: FWP 6/6/2025

Friday, June 6, 2025 4:08 PM



Incomplete App Email for Permit Application R13-3708

1 message

Andrews, Edward S <edward.s.andrews@wv.gov>

Fri, Jun 6, 2025 at 4:07 PM

To: Anand Rathinasamy <anand.rathinasamy@erm.com>, William Calhoun <jack.calhoun@fidelisinfra.com>, Michael Dearing <Michael.Dearing@erm.com>

Cc: Joseph R Kessler <joseph.r.kessler@wv.gov>

RE: Application Status: Incomplete MGS CNP 1, LLC/BECCS Plant Permit Application No. R13-3708 Plant ID No. 053-00134

Mr. Calhoun:

Your application for a construction permit for a steam to electric generation facility was received by this Division on February 24, 2025, and assigned to the writer for review. It has been determined that the application as submitted is incomplete based on the following items:

1. The emission of non methane hydrocarbons (NMHC) plus nitrogen oxides (NOx) presented in the application from the emergency engine for the firewater pump (Emission Unit ID 129-P-9402) indicate potentially non-compliance with the NMHC + NOx standard for stationary fire pump engines of Subpart IIII to 40CFR60. Please update your application accordingly.

Please address the above issue by June 23, 2025. Application review will not commence until the application has been deemed to be technically complete. Failure to respond to this request in a timely manner may result in the denial of the application.

Should you have any questions, please contact Ed Andrews at (304) 926-0499 ext. 41244 or reply to this email.

Thanks,

Ed

Edward Andrews, P.E.
Engineer
WVDEP/Division of Air Quality
304-926-0499 Ext 41244
601 57th Street, SE
Charleston, WV 20304

Friday, May 9, 2025 7:39 AM



Andrews, Edward S <edward.s.andrews@wv.gov>

Re: Emission Calculations & The Amine Absorber

Andrews, Edward S <edward.s.andrews@wv.gov>
To: Michael Dearing <Michael.Dearing@erm.com>

Fri, May 9, 2025 at 7:38 AM

Here is the pdf of the caustic and amine scrubbers. I am still having issues getting a pipeline block to converge in a compression flow sheet.

Thanks

On Thu, May 8, 2025 at 2:51 PM Andrews, Edward S <edward.s.andrews@wv.gov> wrote:

Using US EPA Method 19 with the default Fd for wood (9400 dscf/MMBtu) and the conc. listed in the app, I am getting different results than presented in the application.

	Emission Data		Emi	ission Ra	tes
Pollutant	ppmvd	% O2	lb/MMBtu	lb/hr	TPY
NOx	13.55	5.23	0.020	19.110	82.843
CO	11.24	5.23	0.010	9.651	41.836
SO2	5.58	5.23	0.012	10.957	47.499
H2SO4	2	5.23	0.006	6.013	26.066
HCI	1	5.23	0.001	1.105	4.790

Method 19 does outline a method to calculate the Fd for a specific fuel if ultimate analysis of the fuel is available.

I notice the selected amine in the application is MDEA. MDEA a lone will be very difficult to achieve a 90% removal efficiency for CO2. I would have expected a see a mixture of MDEA plus piperazine (40 + 5 up to 10% by wt.) as the

amine.
Using either solely MDEA or a mixture of MDEA plus piperazine, any and all of the residual SO2 exiting the caustic scrubber with be absorbed in the rich amine or lockup in the amine. The real question is does the CO2 dehydrator release any of this captured SO2.
I would assume it does. I found that if the caustic scrubber is ran a little harder the amine unit converges completely. Once I get the "compression and injection" and "dehydration" flow sheet intergraded completely, I will share the Promax file with you.

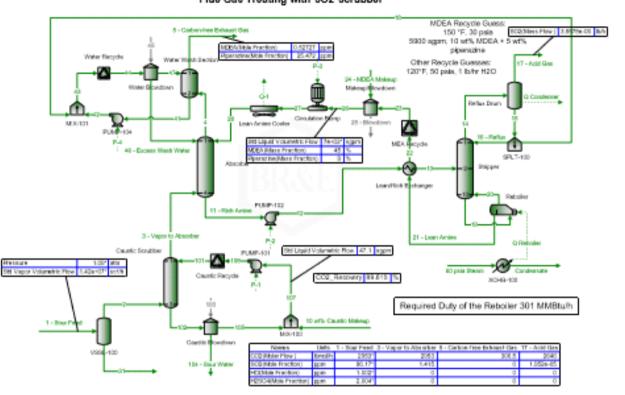
Thanks, Ed

Edward Andrews, P.E. Engineer WVDEP/Division of Air Quality

304-414-1244 601 57th Street, SE Charleston, WV 25304 Visio-SO2_CO2_scrubbers_W_Compression_Dehy_units.pdf



Flue Gas Treating with SO2 Scrubber



Updated Response 5/8/2028

Friday, May 9, 2025 7:42 AM





RE: Incomplete App Email

1 message

Michael Dearing < Michael. Dearing@erm.com>

Thu, May 8, 2025 at 3:47 PM

To: "Andrews, Edward S" <edward.s.andrews@wv.gov>, William Calhoun <jack.calhoun@fidelisinfra.com> Cc: Joseph R Kessler <joseph.r.kessler@wv.gov>, Anand Rathinasamy <anand.rathinasamy@erm.com>

Ed,

I just realized that one of the pages of comment responses got removed on accident I've attached the full comments here.

Thanks



Michael Dearing

Principal Consultant, Scientist

Charleston (WV)

erm.com

O +1-(612)-347-7144

C +1-(304)-654-2227

From: Michael Dearing < Michael. Dearing@erm.com>

Sent: Thursday, May 8, 2025 10:57 AM

To: Andrews, Edward S <edward.s.andrews@wv.gov>; William Calhoun <jack.calhoun@fidelisinfra.com> **Cc:** Joseph R Kessler <joseph.r.kessler@wv.gov>; Anand Rathinasamy <anand.rathinasamy@erm.com>

Subject: RE: Incomplete App Email

Ed,

Attached is MGS CNP 1, LLC response to comments WV DEP issued on 4/22/2025 and 4/25/2025.

Let us know if you have additional questions.

Thanks



Michael Dearing

Principal Consultant, Scientist

Charleston (WV)

erm.com

0 +1-(612)-347-7144

C +1-(304)-654-2227

From: Andrews, Edward S <edward.s.andrews@wv.gov>

Sent: Tuesday, April 22, 2025 3:21 PM

Cc: Joseph R Kessler < joseph.r.kessler@wv.gov>

Subject: Incomplete App Email

EXTERNAL MESSAGE

RE: Application Status: Incomplete

MGS CNP 1, LLC/BECCS Plant

Permit Application No. R13-3708

Plant ID No. 053-00134

Your application for a construction permit for a steam to electric generation facility was received by this Division on February 24, 2025, and assigned to the writer for review. Upon initial review of said application, it has been determined that the application as submitted is incomplete. It has been determined that the application as submitted is incomplete based on the following items:

1. Missing an discussion on the purpose (e.g. sell of electricity) of the excess electricity generated by the proposed boiler/steam turbine generator. If your proposed generation is to be used for a data center or other use that requires a redundant (backup) supply of electrical, please identify this alternative/backup source of electricity for the primary end user. This discussion needs to clearly answer whether the electricity is being sold, the planned amount of electricity to be sold, is there a purchase power agreement in place, please note the source of required electricity for normal startup operations will be purchased/supplied from local electricity wholesaler/another generating unit, and the nameplate rating of the generator. Please note if the facility is going to be connected to the electrical grid system (e.g. PJM), please explain the relationship (e.g., solely purchaser/consumer, wholesaler/generator).

Please note the amount of excess steam will be utilized to provide heat energy for the amine regenerator (temperature and pressure is also needed). Please provide details of the energy consumption of the facility, type of energy consumed (e.g. electricity, steam, natural gas) for the CO2 dehydration unit and compression and whether these energy requirements for these activities will be part of the auxiliary load of the facility or require additional combustion units.

The DAQ has an unclear understanding of what will be the source of the electricity to start the proposed emissions units. Please keep in mind, the emergency engine for the emergency generator can only be operated for 50 hours per year of non-emergency use. This discussion needs to describe the electrical system that the steam turbine/generator will be connected to and the source of the electricity needed for normal startup/shutdown operations. Please explain in further detail exactly how the fluidized bed boiler will be preheated for startup with the use of steam from an auxiliary boiler or other steam generator.

- 2. Missing completed individual control device sheets for the SCR, OxyCat, Wet FGD, and DSI for the boiler. Please identify key parameters that will be monitored to ensure compliance with the proposed emissions with respect to the pollutant(s) being controlled by the associated control device. Also, provide additional information regarding your proposed wet FGD system to determine if the residual moisture exiting the scrubber will pose a possible interference issue with a continuous opacity monitoring system as required in 45CSR2 and 45CSR2A. Given that the application is proposed to be a synthetic minor source under the Title V Program, please provide a monitoring plan for the CO Catalyst, Wet FGD and DSI control device to ensure compliance with proposed emission limits.
- 3. Please provide supporting information to support the claim that the proposed fuel will have sulfur content to satisfy the exemption criteria of 40CFR60.42b(k)(2). Regarding the wood (primary fuel) to be used as fuel for the boiler, the application does not identify the source(s) and species of wood to be used as fuel. If the source(s) of the wood fuel is going to be discarded from a manufacturing process, this/these source(s) of wood need to be identified and evaluated whether the material is a waste/fuel in accordance with 40 CFR 241.

- 4. Please separate the startup emissions for control devices that the performance is impacted/cannot be operated during startup conditions (e.g. SCR, oxidation catalyst, wet FGD) on startup event basis. If a control device performance is impacted during an shutdown, thus shutdown emissions on a short term basis needs to be identified as well. Any by-passing of a proposed control device needs to be identified for startup and shutdown events. Please define the ending of a startup event. The emission calculations are based on NG firing for 10 hours per startup and a total of 55 hours per year for start operations. This accounts for 5 startup events per year with 5 hours unaccounted for. Please explain these 5 unaccounted for hours per year for startup and are the emissions based on firing 100% wood for these hours on an uncontrolled basis.
- 5. Please justify reducing the organic HAPs emission factors published in AP-42 by 88% for the use of CO catalyst when the VOC removal efficiency of 60% for the CO catalyst was applied to account for the control VOC emissions for the boiler.
- 7. Regarding haul road emissions: Please provide the minimum and maximum weight of the vehicles for each of the percentiles used to determine the average weight of the vehicle, and justification of the silt loading. Did the average weight of the vehicles and distance traveled account for equipment used to manage the open stockpile? Given that all haul roads are proposed to be paved, is the open stockpile going to be located on a paved surface?
- 8. Please provide additional details on how the HCl emissions from the wastewater treatment unit were determined and how these HCl emissions will be determined when the wastewater treatment unit is in operation.

Please address the above deficiencies in writing by no later than May 12, 2025. Application review will not commence until the application has been deemed to be technically complete. Failure to respond to this request in a timely manner may result in the denial of the application.

Should you have any questions, please contact Ed Andrews at (304) 926-0499 ext. 41244 or reply to this email.

_

Edward Andrews, P.E.

Engineer

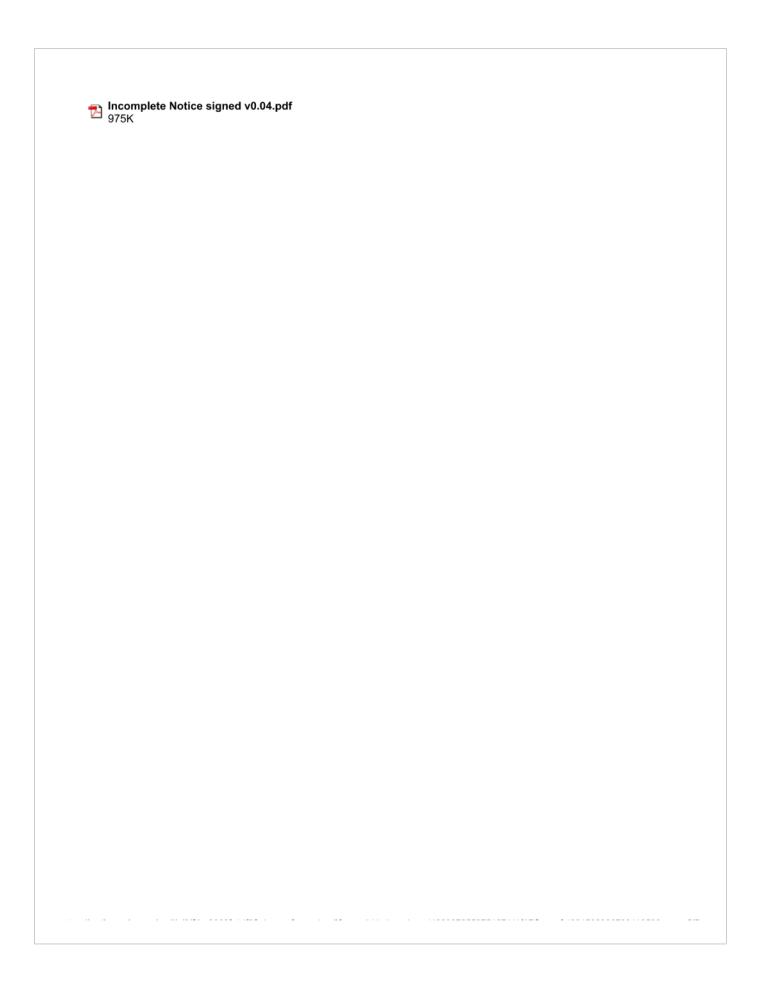
WVDEP/Division of Air Quality

304-414-1244

601 57th Street, SE

Charleston, WV 25304

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MGS CMP 1, U.C 109 Post Calt Lane, Suite 148 Houston, TX 77504



May 6, 2005

Laura M. Crowder, Director WV Department of Environmental Protection (WVDEP) Division of Air Quality (DVQ) 601 57° Street SE Charleston, WV 15304

Re: Application Status Incomplete MGS CRP 1, U.C.BECCS Plant Pernal Application No. 813-3108 Plant ID No. 953-93134

Ms. Crewder,

Please find our responses to each of your questions/comments in the incomplete application notice sent to MCG CAP 1, LLC (MCG) on April 25" 2025, MCG has provided a detailed response in April 25" address all the questions surrounding the application for the BECCS plant.

The following items will be attached to address comments.

- Updated enterior calculations
- Eval analysis
- Updated Equipment Table (Attachment I)

If you have additional questions, please do not hasitate to cortect us.

Binoesely.

Witten D (350k) Cothous, P.E.

Vice President, HSE



WVDEP Questions and MG3 Response MG3 CNP 1, LLC/BECC 8 Plant Permit Application No. R13-8708 Plant ID No. 053-00184

WVDEP Question NO.1:

1. Missing an discussion on the purpose (e.g. sell of electricity) of the excess electricity generated by the proposed boller/steam turbine generator. If your proposed generation is to be used for a data center or other use that requires a redundant (backup) supply of electrical, please identify this alternative/backup source of electricity for the primary end user. This discussion needs to clearly answer whether the electricity is being sold, the planned amount of electricity to be sold, is there a purchase power agreement in place, please note the source of required electricity for normal startup operations will be purchased/supplied from local electricity wholesaler/another generating unit, and the nameplate rating of the generator. Please note if the facility is going to be connected to the electrical grid system (e.g. PJW), please explain the relationship (e.g., solely purchaser/consumer, wholesaler/generator).

MGS Response

 All electricity generated by the steam turbine generator will be consumed by the biomass feed handling, biomass boller, flue gas treatment, ash handling, postcombustion carbon capture, compression, chemical storage, raw water treatment, wastewater treatment, and utilities. The biomass boiler will combust sufficient blomass to produce approximately 2,300 metric tonnes per day of CO2 (210,000 lb/hr), which is the amount of carbon gloxide required to achieve the project's targeted carbon dioxide removal (CDR) credits. Steam generated in the boller from the heat of combustion from the blomass is sent to the steam turbine generator to produce electricity to support the operating load of the facility. Any excess steam produced from the boiler will bypass the steam turbine generator to produce low-pressure steam or be condensed in the surface condenser. The steam turbine generator only produces electricity to support the operation of the facility and does not produce excess electricity for the local electrical orld or any onsite user such as a datacenter. The facility will be built to start-up and operate in Island-mode and does not have a connection to the local electrical orid. Please note that only the onsite administration building, warehouse, and laboratory will have a connection to the local orld. Electricity for start-up will be provided by a 3,000 hp natural gas generator and start-up emissions from the natural gas generator have been accounted for in this application at emission (129-PKG-0001- EP) .

Please note the amount of excess steam will be utilized to provide heat energy for the amine regenerator (temperature and pressure is also needed). Please provide details of the energy consumption of the facility, type of energy consumed (e.g. electricity, steam,



natural gas) for the CO2 dehydration unit and compression and whether these energy requirements for these activities will be part of the auxiliary load of the facility or require additional combustion units.

MGS Response

Electricity and steam for CO2 dehydration and compression are included in the total energy consumption of the facility. The total normal operating electrical demand for the facility is approximately 40,000 hp, of which, 23,276 hp is required for the carbon capture unit, CO2 compression and conditioning systems (i.e., dehydration and deoxygenation). The biomass bolier produces approximately 672 kib/hr of high-pressure steam (1,710 psig at 1,000°F), of which, approximately half of the high-pressure steam bypasses the steam turbine and is flashed to generate 314 kib/hr of low-pressure steam (100 psig at 335°F) of which 267 kib/hr is used by the carbon capture unit. The balance of the high-pressure steam is used to generate electricity in the steam turbine.

The DAQ has an unclear understanding of what will be the source of the electricity to start the proposed emissions units. Please keep in mind, the emergency engine for the emergency generator can only be operated for 50 hours per year of non-emergency use. This discussion needs to describe the electrical system that the steam turbine/generator will be connected to and the source of the electricity needed for normal startup/shutdown operations. Please explain in further detail exactly how the fluidized bed boiler will be preheated for startup with the use of steam from an auxiliary boiler or other steam generator.

MGS Response

A 3,000 hp natural gas generator will be used to provide electricity to start-up the auxiliary and utility systems (e.g., raw water treatment, boiler feedwater, instrument air, etc.) required prior to starting up the biomass boiler. The biomass boiler will combust natural gas to pre-heat the fluidized bed. Boiler feedwater will be introduced to the biomass boiler to generate high-pressure steam. Once the heat input on the boiler has been established, biomass is introduced to the boiler, natural gas to the boiler as fuel is decreased, and the high-pressure steam production rate increases. The high-pressure steam is sent to the steam generator to produce electricity to support the operation of the facility, and the natural gas generator is slowly phased out. The application includes durations for operating the natural gas generator (100 hours) and for start-up of the biomass boiler (66 hours).

Please note, the emergency engine is only used for the firewater pumps. The application includes a duration of 100 hours for emissions from the firewater pumps; however, these pumps are only anticipated to be operated for testing and maintenance. If this needs to be reduced to 60 hours, we are accepting the recommendation and emission calculation have been updated.



DAQ Question No. 2:

2. Missing completed individual control device sheets for the SCR, OxyCat, Wet FGD, and DSI for the boiler. Please identify key parameters that will be monitored to ensure compliance with the proposed emissions with respect to the pollutant(s) being controlled by the associated control device. Also, provide additional information regarding your proposed wet FGD system to determine if the residual moisture exiting the scrubber will pase a possible interference issue with a continuous opacity monitoring system as required in 45CBR2 and 45CBR2A. Given that the application is proposed to be a synthetic minor source under the Title V Program, please provide a monitoring plan for the CO Catalyst, Wet FGD and DSI control device to ensure compliance with proposed emission limits.

MGS Response

- a. Currently N/GS CNP 1 does not have specification sheets from its vendors for each of these control devices, as the design of the plant is ongoing, and equipment vendors have not been finalized yet. All emission calculations are based on minimum guarantees provided by the vendors.
- b. At this Time I/IGS CNP 1 does not have a complete monitoring plan as the plant design is not complete. Once design is finalized a modification will be filed to undate these requirements.

DAQ Question No. 3:

3. Please provide supporting information to support the claim that the proposed fuel will have sulfur content to satisfy the exemption criteria of 40CFR60.42b(k)(2). Regarding the wood (primary fuel) to be used as fuel for the boiler, the application does not identify the source(s) and species of wood to be used as fuel. If the source(s) of the wood fuel is going to be discarded from a manufacturing process, this/these source(s) of wood need to be identified and evaluated whether the material is a waste/fuel in accordance with 40 CFR 241.

MGS REsponse

a. At this time I/IGS CNP 1 has determined that the Blomass analysis is proprietary information and will be following all procedures to maintain confidentiality for this analysis and for any future blomass samples. A reducted analysis will be provided that will include only the necessary information to verify the emissions. The Natural das sample will be attached to this response.

DAQ Question No. 4:

4. separate the startup emissions for control devices that the performance is impacted/cannot be operated during startup conditions (e.g. SCR, oxidation catalyst, wet FGD) on startup event basis. If a control device performance is impacted during an shutdown, thus shutdown emissions on a short-term basis needs to be identified as well. Any bypassing of a proposed control device needs to be identified for startup and



shutdown events. Please define the ending of a startup event. The emission calculations are based on NG firing for 10 hours per startup and a total of 55 hours per year for start operations. This accounts for 5 startup events per year with 5 hours unaccounted for. Please explain these 5 unaccounted for hours per year for startup and are the emissions based on firing 100% wood for these hours on an uncontrolled basis.

MGS Response

- a. The SCR and CO Catalyst are bypassed for 11 hours during start-up of the biomass boller (5 x 11 = 66 hrs). During this duration, the biomass boller combusts natural gas for 10 hours to pre-heat the fluidized bed. The application includes allowances for start-up emissions based on guarantees provided by the biomass boller vendor.
- b. Please note, no reduction in emissions were assumed for the Direct Contact Cooler / Polishing Scrubber (DCCPS) – this is the same device as the wet FGD.
- Emission have been separated into normal operation and startup operations and are attached to this email.

DAC Question No. 5:

 Please justify reducing the organic HAPs emission factors published in AP-42 by 88% for the use of CO catalyst when the VOC removal efficiency of 60% for the CO catalyst was applied to account for the control VOC emissions for the boiler.

MGS Response

a. The organic HAPs were adjusted by multiplying the ratio of the biomass boiler vendor's guaranteed VOC emission factor to the AP-42 VOC emission factor. These adjusted emission factors are also used to calculate the biomass boiler's organic HAPs.

DAQ Question No. 6:

6. Regarding haul road emissions: Please provide the minimum and maximum weight of the vehicles for each of the percentiles used to determine the average weight of the vehicle, and justification of the sit loading. Did the average weight of the vehicles and distance traveled account for equipment used to manage the open stockpile? Given that all haul roads are proposed to be paved, is the open stockpile going to be located on a paved surface?

M98 Response

- in the updated calculations, min and max weight for each vehicle type have been provided.
- b. Due to BECCS facility not fitting into one of the defined categories in table 13.2.1-3. BECCS facility used Table 13.2.1-2. The Ubiquitous Baseline 0.6 g/m² and a multiplier of 4 is applied for low volume roads (< 600 Average Daily Traffic) to obtain a wintertime baseline slit loading of 4 X 0.6 = 2.4 g/m².

MGS CNP 1, LLC 109 Post Dak Lane, Suite 140 Houston, TX 77024



The biomass stockpile will be placed on a paved surface.

DAQ Question No. 7:

provide additional details on how the HCI emissions from the wastewater treatment unit
were determined and how these HCI emissions will be determined when the wastewater
treatment unit is in operation.

MGS Response

- a. It was conservatively assumed that approximately 10% of the HCl would be absorbed in the solution from the flue gas in the Direct Contact Cooler/ Polishing Scrubber. The solution is then sent to WWTP and it is conservatively assumed that all the HCl will be emitted to the atmosphere.
- b. Once the operation of the plant begins, HCL emissions from the WWTP will be determined by sampling for HCl periodically at the inlet and outlet of the WWTP. Sampling data will be used to estimate HCl emissions and verify compliance.

Additional DAQ Questions:

I notice that some (not all) of the control devices have the same ID number as the
emission point. Also, the equipment id is also used as the emission point id. A different
ID needs to be used for the emission point.

M98 Response

The attachment I have been updated to have separate Emission unit IDs and Emission Point IDs. Control Device IDs have changed as well.

From Attachment I, I read that the makeup sand and sodium bicarbonate storage silos
are venting into the BFB boiler and therefore the exhaust is controlled by the same boiler
pontrol devices. Also, there is a by-pass stack for the CCU (122-T-1001).

MGS Response

Correct: however, the bypass stack is 121-PKG-3001 not 122-T-1001.

10. For the Sand Receiving Bin (121-8-1002), it lists as the control device that vent is piped to BFB. If that is the case, the emission point for the sand receiving bin would be either 121-PKG-3001 or 122-T-1001 and not 121-8-1002.

MGS Response

The Sand Receiving Hopper (121-S-1002) is not vented to 121-PKG-3001 (SFB Boiler Stack) or 122-T-1001 (Absorber). The Sand Receiving Hopper collects sand from the truck and directs it to the inclined Sand Conveyor. The sand from the conveyor is stored in the Makeup Sand Silo (121-S-5001) which vents to the BFB Boiler Stack, when the carbon capture unit is not in operation or the Absorber during normal operation. The Sand Receiving Hopper is open to the atmosphere.

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11. For the capacity of silo and bins, please list the mass capacity for the silo or bin and not the throughput rate. The open storage pile for the wood chips needs a capacity value either on a mass or area basis.

MGS Response

All sizes are preliminary and not finalized. It should also be noted that the emissions from these sources are based on the throughput handled and not depended on size of the silo or bins.

- a. 121-LS-1001 Biomass Receiving Hopper approx. 6,000 ft3
- b. 121-LS-1002 Biomass Receiving Hopper approx. 6,000 ft3.
- 121-8-1001 Biomass Feed Hopper = 1,500 ft3
- d. 121-S-1002 Sand Receiving Hopper = 6,000 ft3
- e. 121-S-2001A/B Blomass Fuel Metering Bin = 4,200 ft3 each
- f. 121-S-4001A/B Fly Ash Storage Silo = 9,500 ft3 each (166 tons each)
- g. 121-S-6001 Makeup Sand Silo = 1,660 ft3
- h. 121-S-9901 Sodium Bicarbonate Storage Silo = 2,000 ft3
- Chip Pile = 14 days of storage (71,265.6 k/bs = 212.1 k/b/hr x 24 hrs/day x 14 days)



Andrews, Edward S <edward.s.andrews@wv.gov>

RE: Incomplete App Email

Michael Dearing -Michael Dearing@arm.com>
Thu, May 8, 2025 at 10:57 AM
To: *Andrews, Edward S.**-edwards.andrews@awogov-, William Calhoun -jack.calhoun@iddelinhia.com>
Co. Joseph R Reader -Joseph: Resett@awogov-, Anand Rathinsaamy -anand/zarinsaamy@arm.com>

Ed.

Attached is MGS CNP 1, LLC response to comments WV DEP issued on 4/22/2025 and 4/25/2025.

Let us know if you have additional questions.

Thanks



Charleston (WV)

O +1-(612)-347-7144

C +1-(304)-654-2227

From: Andrews, Edward 5 - edward a. andrews@wv.gov>
Sent: Tursday, April 22, 2025 3-21 PM
Tax William Calbun jack. calbun.gl@delsinfra.com>; Michael Dearing «Michael Dearing@em.com>
Ce: Joseph & Resider - gloseph: Krassberg@wv.gov>
Solighet: Ticorrg@edw.pp Email

EXTERNAL MESSAGE

MGS CNP 1. LLC/BECCS Plant Permit Application No. R13-3708 Plant ID No. 053-00134

Your application for a construction permit for a stars to electric generation facility was received by this Division on February 24, 2025, and assigned to the writer for review. Upon initial review of said application, it has been determined that the application as submitted is incomplete based on the following Zons:

1. Missing an discussion on the purpose (e.g., sell of electricity) of the excess electricity generated by the proposed budierizems turbine genomics. If your proposed generation is to be used for a data center or other toe that requires a reachant backed-purpose and pulped electricity, places leading this attention-backed power of electricity for the primary call user. This represents the proposed prop

Please note the amount of excess steam will be utilized to provide heat energy for the arrine regonerator (temperature and pressure is also needed). Please provide details of the energy consumption of the facility, type of energy consumed (e.g. electricity, steam, stantly gas for the COZ debylations until and compression and websher these energy requirements for these activities will be part of the auxiliary load of the facility or require additional combustion units.

The DAQ has an unclear understanding of what will be the source of the electricity to start the proposed emissions units. Please keep in mind, the emergency engine for the emergency generate can only be operated fire 50 hours per year of anomalyses year. The discussion needs to describe the electricit system that the soan unbertagenessive will be consected to and the source of the electricity needed for normal stamps shadows operations. Please capitals in further detail exactly low the findiced both bother will be preducted for stamp with the use of stams from a maximity bolder or other sound generate.

2. Missing completed individual control device shorts for the SCR, OxyCat, Wet PGD, and DSI for the buller. Please identify key parameters that will be reminired to ensure compliance with the preposed emissions with respect to the profunation being controlled by the associated control device. Also, provide additional information regarding your persposed wast FGD system to determine if the residual moisture coxing the scribber will pose a possible interference issue with a continuous requiry insurinering system as required in SCRS2. And 44/SSR2A. Cover that degregation is responsed in let a synthetic miner source under the Uth V Program, please provide a nonmining fran for the CO Caulyst. We FGD and DSI control device to mean exemptions with proposed emission.

053-00134_IPR_13-3708 Page 39

- 3. Please provide supporting information to support the claim that the proposed field will have saffar content to sarisfy the exemption relative of 40KFR60-42bk/20. Regarding the wood inprintey fact) to be used as field for the boiles, the application does not identify the source(s) and species of wood to be used as fact. If the source(s) of the wood field is paing to be discarded from a manufacturing process, this/these source(s) of wood to tend to be identified and evaluated whether the material is a waste field in accordance with of CFR 241.
- 4. Please separate the startup emissions for control devices that the performance is impacted/custor be operated during stutup conditions (e.g. SCR, cuidation cutlyst, set FGD) on startup event basis. If a control device performance is impacted during a studient, that solution emissions on as short time hast needs be identified as well. Any by-peasing of a proposed control device needs to be identified for surtap and shadown events. Please define the ending of a sturap over. The emission calculations are book on No firing for 10 box per sturing and as old of 55 boxs per yea for start operation. This account for 5 turing events per year with 5 boxes stances under for Please explain these 5 nancount for box per year for start per vertex per start per vertex per year.
- Please justify reducing the organic HAPs emission factors published in AP-42 by 88% for the use of CO catalyst when the VOC removal efficiency of 60% for the CO catalyst was applied to account for the central VOC emissions for the boiler.
- 7. Rogarding host road emissions: Please provide the minimum and maximum weight of the vehicles for each of the percentiles used to determine the average weight of the vehicle, and justification of the silt beating. Dot the average weight of the vehicles and distance traveled account for equipment used to manage the open stockpile? Given that all board roads are purposed to be proved, in the open stockpile going in the located on a paved surface?
- Please provide additional details on how the HCI emissions from the wastewater treatment unit were determined and how these HCI emissions will be determined when the wastewater treatment unit is in operation.

Please address the above deficiencies in writing by no later than May 12, 2025. Application review will not commence until the application has been deemed to be technically complete. Failure to respond to this request in a timely matner may result in the dential of the application.

Should you have any questions, please contact Ed Andrews at (304) 926-0499 ext. 41244 or reply to this email.

Edward Andrews, P.E.
Engineer
WVDEP/Division of Air Quality

WVDEP/Division of Air Quality 304-414-1244

601 57th Street, SE

Charleston, WV 25304

This e-real and any allustreman may contain proprietary, confidential and/or privileged information. No confidentially or privilege is wained or lead by any transmission entrols. The communication is intended eably for the intended recipient, and if you are not the intended recipient, please codily the sender intendedays, define in them pay are privileged. The intended recipient please coding and privileged recipients and other codes of containing and containing and other intendedays, define in the communication and discrepance in the intended and other intendedays, define in the intended and define intendeday. The intended and other intendedays are not of the intended and other intendedays and the intended and other intendedays. The intended and other intendedays are not of the intended and other intendedays. The intended and other intendedays are not of the intended and other intended and other intendedays. The intended and other intendedays are not of the intended and other intendedays. The intended and other intendedays are not of the intended and other intendedays. The intended and other intendedays are not intended and other intended and other intendedays. The intended and other intendedays are not of the intended and other intendedays. The intended and intended and other intendedays are not of the intended and other intendedays. The intended and intended

Incomplete Notice Response v0.01.pdf

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MGB GMP 1, U.C 109 Post Celt Lane, Suite 148 Hisuaton, TX 77894

MFIDELIS

May 6, 2026

Lours M. Crowder, Director VeV Department of Environmental Protection (WVDEP) Division of AV Quality (DVQ) 001 STP Steet SE Charleston, WV 25004

Ms. Crewdor,

Please find our responses to each of your quotions/convenints is the incomplete application natice sent to MICIS CMP 1, LLC deliciti or April 29" 2025. MICIS has provided a detailed response in 8xico to address all the questions surrounding the application for the RECCS plant.

The following items will be attached to address comments:

Updated enterior calculations

Fuel analysis

Updated Equipment Table (Attachment I)

If you have additional questions, please do not healtate to contact us

#FIDELIS

natural gas) for the CO2 dehydration unit and compression and whether these energy requirements for these activities will be part of the auxiliary load of the facility or require additional combustion units.

MOS Response

Electricity and steam for CO2 dehydration and compression are included in the total energy consumption of the facility. The total normal operating electrical demand for the facility is approximately 40,000 ftp, of which, 25,27% hp is required for the carbon capture unit, CO2 compression and conditioning systems (i.e., dehydration and obcologination). The blomess holder produces approximately 273 kilothr of high-pressure steam (17,00 pp) get 1,0007%; of which, approximately half of the high-pressure steam toypesses the steam number and in flashed to generate 314 kilothr of ins-pressure steam (100 pelg at 3507%) of which 257 kilothr is used by present systems of the high-pressure steam is used to generate electricity in the steam sizeline.

The DAG has an unclear understanding of what will be the source of the electricity to start the proposed emissions units. Please keep in mind, the emergency engine for the emergency generator can only be operated for 50 hours per year of non-emergency use. This discussion needs to describe the electrical system that the steam burking ignorator will be connected to and the source of the electricity needs for normal sartup/shuddown operations. Please explain in further detail exactly how the fluidized bed boller will be preheated for startup with the use of steam from an auxiliary boller or other steam generator.

generator.

I/OS Response
A 3,000 ha natural gas generator will be used to provide electricity to start-up the auxiliary and utility systems (e.g., raw water freatment, coller fredwater, instrument all, etc.) required prior to starting up the elonimass coller. The blomass boller will combinary natural gas to pro-heat the fluiditised bed. Biller feedbaster will be inholicated to the blomass coller fregering the present high-pressure steem. Once the heat input on the boller has been established, informatic plans to informational to the coller as fuel is decreased, and the high-pressure steem production rate increases. The high-pressure steem is sent to the steem generator by produce electricity is support the operation of the faculty, and the natural gas generator is slowly-phased out. The application includes durations for operating the natural gas generator (100 hours) and for start-up of the blomass boller ISS hours!

Please note, the emergency engine is only used for the flewater pumps. Thosewer, these pumps are only anticlosted to be decreated for starting and maintenance if this needs to be reduced to S0 hours, we are accepting the recommendation and emission calculation have been updated.

MGS CNP 1, LLC 109 Post Dak Lane, Suite 140 Houston, TX 77024

#FIDELIS

en, TX 17034

DAC Quastion No. 2:
Missing competed individual control device sheets for the BCR, DityCet, Wet FGD, and
DBI for the bother. Please identify key parameters that will be monitored to ensure
compliance with the proposed emissions with respect to the poliutantist being controlled
by the associated control device. Aso, provide additional information regarding your
proposed wet FGD system to determine if the residual most true exiting the scrubber will
pose a possible ininference issue with a continuous poscillo monitoring system as
required in 4505R2 and 4505R2A. Given that the application is proposed to be a
synthetic minor source under the Title V Program, places provide a monitoring plan for
the OD Catalyst, Wet FGD and DBI control device to ensure compliance with proposed

- MGS Response

 a. Currently MGS CNP1 does not have specification sheets from its vendors for each of these control devices, as the design of the plant is ongoing, and equipment vendors have not oben finalted yet. All emission calculations are based on minimum guarantees provided by the vendors.

 b. All this Time (MGS CNP1 does not have a complete monotoring plan as the plant.)
 - design is not complete. Once design is finalized a modification will be filed to update these requirements.

DAQ Question No. 3:

AQ Question No. 3: A. Please provide supporting information to support the dialm that the proposed fuel will have suffur content to satisfy the exemption criteria of 40CPR60.43b(k)(2), Regarding the wood (primary fuel) to be used as 4-lef for the bolier, the application does not intended that source(s) and species of wood to be used as fuel. If the source(s) of the wood fuel is going to be discarded from a manufacturing process, this these source(s) of wood need to be identified and evaluated whether the material is a wastefuel in accordance with 40 CFR 241.

MGS Response

At this time MGS CMP 1 has determined that the Blomess analysis is proprietary information and will be following all procedures to maintain confidentiality for this analysis and for any future blomess samples A reducted analysis will be provided that will include only the necessary information to verify the emissions.

DAQ Question No. 4:

4. separate the startup emissions for control devices that the performance is impacted accounted the startup emissions for control devices that the performance is impacted during a startup conditions (e.g. 8CR, oxidation catalyst, wet PGD) on startup event basis. If a control device performance is impacted during an shubdown, thus shubdown emissions in a short-term basis needs to be definited as well. Any bypostaging of a proposed control device needs to be identified as startup and.

MGS CNP 1, LLC 109 Post Dak Lane, Suite 140 Houston, TX 77024



shuldown events. Please define the ending of a startup event. The emission calculations are based on NG firing for 10 hours per startup and a total of 55 hours per year for start operations. This accounts for Startup events be year with 5 hours year for startup end are the emissions based on firing 100% wood for these hours on an uncontrolled basis.

- I/GS Response

 a. The SGR and OO Catalyst are bypassed for 11 hours during start-up of the blomes bottler (6 x 11 + 56 hrd, During this duration, the blomess bottler combusts natural gas for 10 hours to pre-heal the faultied bed. The application includes allowances for start-up emissions based on guerantees provided by the blomess bottler vendor.

 b. Please note, no reduction in emissions were assumed for the Direct Contact Cooley / Polishing Scrubber (DOCPS) this is the same device as the well FIGO.
 c. Emission have been separated into normal operation and startup operations and are affached to this email.

DAQ Question No. 5:

5. Please justify reducing the organic HAPs emission factors published in AP-42 by 88% for the use of DO eatilyst when the VOC removal efficiency of 50% for the OO catalyst was applied to account for the control VOC emissions for the boiler.

I/OS Response

The openic HAPs were adjusted by multiplying the ratio of the biomass boller endors's guaranteed VOC emission factor to the AP-42 VOC emission factor. These adjusted emission factors are also used to calculate the biomass boller's organic HAPs.

Question No. 5:

Regarding heal/ road emissions: Please provide the minimum and maximum weight of the vehicles for each of the percenties used to determine the average weight of the vehicle, and justification of the sit loading. Did the average weight of the vehicles and distance traveled account for equipment used to manage the open stockpile? Given the all hauf roads are proposed to be paved, is the open stockpile going to be located on a paved surface.

- dated calculations, min and max weight for each vehicle type have been
- provided. 5. Our to BERGCS facility not fitting into one of the defined categories in table $\pm 2.1-3$ BERGS facility used Table $\pm 2.1-2$. The Ubbjustious Seasine 0.6 gint and a multiplier of 4 is applied for two volume reader (± 500 Average Daily Traffic) to obtain a wintertime baseline six loading of $4 \times 0.6 = 2.4$ gint?

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c. The blomass stockpile will be placed on a paved surface.

DAQ Question No. 7:

7. provide additional details on how the HCI emissions from the wastewater treatment unit were determined and how these HCI emissions will be determined when the wastewater treatment unit is in operation.

- M3S Response

 a. If was conservatively essumed that approximately 10% of the HCI would be assorted in the solution from the flue gas in the Christ Contact Cooled Fictioning Scrubber. The solution is then sent to WMFP and it is conservatively assumed that at the HCI will be emitted to the atmosphere.

 b. Once the operation of the plant begins, HCI emissions from the WWTP will be determined by sampling for HCI periodically at the third and outlet of the WWTP. Sampling data will be used to estimate HCI emissions and verify compilance.

Additional DAQ Questions:

8. In notice that some (not all) of the control devices have the same ID number as the emission point. Also, the equipment of is also used as the emission point is. A different ID needs to be used for the emission point.

MGS Respons.

The attachment I have been updated to have separate Emission unit IDs and Emission.

Point IDs. Control Device IDs have changed as well.

9. From Attachment, I, read that the makeup sand and sodium bicarbonate storage silos are venting into the BFB bother and therefore the exhaust is controlled by the same boiler control devices. Also, there is a by-pass stack for the CCU (1227-1001).

weet, however, the bypass stack is 121-PKG-3001 not 122-T-1001.
10. For the Sand Receiving Bin (121-6-1002), it lists as the control device that vent is piped to BFB. If that is the case, the emission point for the sand receiving bin would be either 121-PKG-3001 or 122-T-1001 and not 221-6-1002.

MGS Response

The Sand Receiving Hopper (121-S-1002) is not vented to 121-PKG-3001 (BFB Boller Staciji or 122-T-1001 (Absorbed). The Sand Receiving Hopper collects sand from the fruck and directs in the inclinate Sand Conveyor. The sand horn the conveyor is stored in the Halescus Sand Site (121-S-807) which vents to the BFB Boller Stacil, when the carbon capture unit is not in operation or the Absorber during normal operation. The Sand Receiving Hopper is open to the stimosphere.

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11. For the capacity of silo and bins, please list the mass capacity for the silo or bin and not the throughput rate. The open storage pile for the wood chips needs a capacity value either on a mass or area basis.

MGS Response

All sizes are preliminary and not finalized. It should also be noted that the emissions from these sources are based on the throughout handled and not depended on size of the 121-L8-1001 - Blomass Receiving Hopper - approx. 6,000 ft3 b. 121-L8-1001 - Blomass Receiving Hopper - approx. 6,000 ft3 b. 121-L8-1001 - Blomass Receiving Hopper - approx. 6,000 ft3 d. 121-L8-1001 - Blomass Receiving Hopper - 6,000 ft3 d. 121-L8-1002 - Sand Receiving Hopper - 6,000 ft3 d. 121-L8-1002 - Sand Receiving Hopper - 6,000 ft3 d. 121-L8-1001 AB - Blomass Park (Methrog 169 - 4,000 ft3 death of the 121-L8-1001 AB - Blomass Six - 8,000 ft3 death ftd5 fons death) 2,121-L8-1001 - Methrog and Six - 1,000 ft3 death ftd6 ftns death) 3,121-L8-1001 - Soulvin Blombonste Sixrage Six - 2,000 ft3 d. 100 ft9 fte - 14 days of storage (71,205.0 kbs - 212.1 kithir x 24 hrs/day x 14 days)

Natural Gas Analysis

Parameter	Units	Design Value
Higher Heating Value	BTU/scf	1,051
Lower Heating Value	BTU/scf	955
Pressure	psig	600
Temperature	·r	60
Composition (typical)		
Nitrogen	mol%	0.39
Carbon Dioxide	mol%	0.17
Methane	mol%	93.10
Ethane	mol%	5.99
Propane	mot%	0.33
n-Butane	mol%	0.03
i-Butane	moi%	0.02
n-Pentane	mol%	0.004
i-Pentane	mol%	0.007
Hexane	mol%	0.007
Total Sulfur	ppmv	10
Organic Sulfur	ppmv	10
H ₂ S	Grains / 100 SCF	0.25 (max)

Biomass Analysis

Parameter	Units	Value
	Redacted	
Composition (base case)		
	Redacted	
Sulfur	wt%, wet basis	0.01%
	Redacted	

MELOPOJUZ

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List of Tables in Attachment N - Emission Calculations

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**Table 14-3 Subbling Musicion ded Soiler

**Table 14-3 Subbling Musicion ded Soiler

**Table 14-5 Emission Factors for Sieman Handling Process

**Table 14-4 Emission Factors for Sieman Handling Process

**Table 14-5 Storage Pile Wind Emission

**Table 14-5 Storage Value Factors

**Table 14-5 Storage Value Pile

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SECCS Plant Air Quality Permit Application December, 2024

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MCCCPlane Air-Caulty/Permit Application Security (CS)

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Tisonic locality by y	3,838-06	2000-00-0	See	5,000-00	5.53-50	528	
incubicourings	S.ACREE	225*2440	Vin.	140101	CHIPPE	523	See 103
e Salka da legale	7,500-06	DMSN	Sa	0.000	0.009400	400	
e Talkadale pile	1,000-00	20424	Sec	0.000	0.009400	0.00	
lidara	8,200-GL	22646	Time.	£20141.	12000	0.00	
Michenistery	3,400-08	2002/07/6	No.	5409-0	3,251.22	420	
C. 27 histographics	5,20100	2564	Time.	1,501-01	1,0000	400	May 163
Publicaments	5,508-00	795344	Yes.	1,339-01	1800	42	
Making Carpendage	1,528-01	7848-4	No.	0.0014.00	5,500+00	(3.00	
Jak Watelengtonal	42,004	MAN COLUMN TO SERVICE	Yes.	4.384	18398	520	
Angli Selucido	SASKE	MICCO.	Time.	LEGIST	12398	2.00	
rilijiese	38088	860%	Time.	21000	180%	681	
indiametria mententi (CC)	1.164						
dielis reselusements (CC)	0.007						
Service Caldin (CCC)	130	200400	Sa	CORP.	6,306-0		
Select Charles (CCV)	265	20004	Sa	CORRE	9,009,00		
SCT-earl	2,665.0						
We final [Cepania r Integratio]				COMME			
legacia Milita				179-2	3,589-8	200	

Septimids 1. Service (1. De Calarier 13), bear in 1925 de servici liment habit magnifera autit est arbendades.

1. Ferrican (1. De Calarier 13), bear in 1925 de servici liment habit magnifera autit est arbendades.

1. Ferrican (1. De Calarier 13), bear in 1925 de servici liment habit magnifera principales plantes (1. De Calarier 13), bear in 1925 de servici autit magnifera (1. De Calarier 13), bear in 1925 de servici autit magnifera (1. De Calarier 13), bear in 1925 de servici autit magnifera (1. De Calarier 13), bear in 1925 de servici autit d

Milesen	749-049-0250		
Year Review	James Bellater Amer (by Allaha)	HAP	HOMP (Notice)
laine;	20000	Fee	0.000009
legaria.	3328E	Per .	1,000,00
larian:	2700-01	Bu	
beiler	1,500-00	Fig.	0.000001
Conjection	1,22841	The second	0.0000000
Sharekenjami	3,225-01	Sec.	0.00000
Streeture, teransilara	ESCHOL	Pin .	0.000001
Salah	61000	The same of	0.000000
Sapper	SACRE	Bu	
tree.	BACKS.	Bar	
ani	1429-31	Per	1,22014
(Berenne)	12000.	Ten.	0.00003
limes:	11080	- Pag	0.055000
(h) Mese	3,00000	Re	-
Ninker	11000	- In	1,22011
"mpro-	27000	- 10	0.00007
Transition .	14080	Bu	
Minde	342840	The same	0.0000004
Bluer .	2750KI	Re	
Smill over	542KI.	Bu	
legenker.	12080	No.	
ъ	TERRE	Bu	
Torker	52000	Bu	
dentilee	6,628-07	Bu	
Technology (Control of the Control o	ESSET*	Bu	- 1
line .	(150FG).	Par	
Househow Transference Total			0.000000

1. In this years the related forms the explanation form with \$1.00 for sole than 10 and \$1.00 for sole the sole than \$1.00 for sole the sole than \$1.00 for sole than

MCCS Plane Jir-Saalley Permit Sypthesium Securitary 2000

Displace Selections for Sel-Associating (ISSS: 1982) Selections (In Selection) (ISSS: 1982) Selection (ISSS: 1982)

Table N-2 Wood Chips Receiving Hoppers MGS CNP 1, LLC

Source Name:	Sigmass	Unloading Saghouse	EPN:		121-795-100	1
Proposed MAE	RT Limits		Date:		5/6/2025	
FIR	4	EPN	Air Contaminant		lbs/hr	TPY
121-L5-1001 121-L5-1002	1001	121-PKS-1001	PM		1.08	4.72
			PM10		1.08	4.72
		PM	2.5	1.08	4.72	

Wood fuel is delivered to the size by twoks. Trucks unload wood fuel into two receiving happens (221-43-1001 and 221-43-1000). Out confirs is provided by a slight negative pressure in the dumping area. The extracted dust laden air will be directed through a bag house (121-940-1001) before displayed to almosphere.
The bag house will reduce the particulate matter emissions to reach a PMI loading of 0.01 grains/ef.

To represent worst case emissions, maximum hourly emissions for 1214-1-1001 and 1214-1-1002 are both based on the total amount of wood fluid to be delivered to the site, rather than a piliting the emissions in half. This scenario is conservative, as if one of the truck unleaders fails, fluid can be delivered to the chargest relationship to the control of the truck unleaders fails, fluid can be delivered in the other unisiders and 1014-0001 and 1214-151001 are permitted under a cap quantified based on the maximum amount of wood thips delivered each year.

Cases and Fectors:

Particulate Matter (PM) emissions from truck unloading are estimated using the following design information:

Seahouse volumetric exhaust flow rate:

12586 ft5/min

The bag house will reduce the particulate matter emissions to a PM loading of 0.01 grains/cf.

Hourly emission rates are determined as follows:

recursy emission rates are observance as increases.

Hourly Emissions $||\mathbf{b}|| h_1 \rangle = chaust flow <math>\langle \mathbf{t}| \mathbf{b} \rangle / m_1 \rangle \times 60 \min \langle hr \times 7M | looking in schools (0.01 grains/d)$ Annual emission rates are determined as follows:

Annual Emissions $(ty) = (hourly emissions (b)/hr)^*$ annual operating hours (hr) / 1,000 (b)/ton)

SECCS Plant Air Quality Permit Application December, 2024

5/6/2025 5:50 PM Emissions Calculations for Air Permitting - 85CC5 - 4.25.25.tbx Table N-2 Accessing Hoppers

Table N-2 Wood Chips Receiving Hoppers MGS CNP 1, LLC

Date:

	Poel Delivered Per Year	Exhaust Flow	PM Loading in Exhaust	Controlled Max Hourly Emissions	Annual Operating Hours	Controlled Annual Emissions
Pollutant	tons/yr	fts/min	gr/cf	lb/hr	hr/year	tpy
PM	929146.92	12555	0.01	1.08	8760	4.72
PM10	929146.92	12566	0.01	1.08	8760	4.72
PM2.5	929146.92	12555	0.01	1.08	8760	4.72

SECCS Plant Air Quality Permit Application December, 2024

5/8/2025 5:50 PM Emissions Calculations for Air Permitting - 86CC3 - 4,25.25.tbx Table N-2 Receiving Hoppers

Table N-0 Berkelen Fasters MGS CNF 1, U.C.

Bedader Fudiers for Bloman Handling France. Bedaders are Euroline 19-12 exhalar factors for Aggregate Handling and Stanage Film (49-12 12) Senten 18.2.4.2, Newwise 1990)

inverage III-ni Speed is addated from US SPA AP-12 Table 7.1-7 for Huntington, West Veginia (absent Safa paties for paint)

	Sev	or beneated		
Pellone	Perside Day (pm)	diel Srege in Transfer Process	Average Melaster K 100, ¹²	~
ANI/TOP	180	1	14	6.74
PM _B	n 30	1	1.4	0.80
Philos	10.0	1	1.4	0.000

[2] E. 100 - 1,00 waterales she quality units; but it of the equation. The website account of the count objects 000.
E. 100 is until to the establishment of performance made.

Places of Operation	4,740	house/poor (21 house/day 2.7 days/work 2.62 works/year)				
Ameni Armago Mindi Aponi of Ame (4)-	14	-41	annyal asaraga and Nghasi masship asaraga			
Higher Manakiy Average Mind Apost of Asso Min	4.4		what speed for Sunsingual, WV salars from US SPE SP-43 Table 7.3-7.			



h = periods due excliptor from 19-01 families 31.5-0.1 M = except frontieurs commo (R) M = except clarity (peri

105/PHI heavily and	leafor former	105/950 ann	val aminatus faculari	
- (0.71) a (0.0012) a	DESCRIPTION OF THE PROPERTY OF	~ [0.71] a [0.0	000 - [04/0]*14/04/0	[544]
	Autora Baylana.	-	A SAAA Tingham	
Philos broady artifact	les formes	PM a annual	amining topon	
PM or have dynamical - (0.81) o (0.883) o	in time [BART-14]KART-14]		melador formes 1815) a (1847) (*114) 64/1	[14.0]
	DESCRIPTION OF THE PROPERTY OF			[F1.1]

Philosophic and Commission of the Commission of	ongrawitates	fores	PM _{AL} areas	dannigen	elializa ficación
 (0.001) + (0.00) 	60) v [644;1]*	(4)(44)(4)(4)	~(0.000) v (0.0000) + (0	THE PERSON NAMED IN COLUMN
	0.0000	lighus.	-	0.3860	lu/un

BICCI Funt & Couldy Permit Application December, 2016

3/3/2013 EAD FOI Berinders Calculations for the Permitting - 8003 - 0.13 Studen Table Not Bis Bernard

Table 941 Element Pending Present MEXICON 1, ILC

Beliador Sele	Emission Palm	Smarlprian
111-0-100	2004/04/06	Converse (C. from Marriag Regulator Manage 1990) on Damara Min
110-CH3603	2009/07/4000	Conveyor-Colore Marries Resolving Magner 1993 to Strongs Mile
CHIPS	2490	However havings Win Laureling Agelston
110-6-6305		linear Intergre
		Conveyor have Pend Regger or 1000/00/00001/jlb.
		James Consept New 250-CP-0001 to Blomes Paul Matering Riv 250-00000. 5
220-CH30018	SECONOCIA E	Leave Conseque from 150-CP-0005 or Blamess And Manaring Bin 150-0-0005. Is
110-0-0005.h	1204048014	Names Sail Nigories No. 3
110-0-0000 A	SOCIO-CHIEF S	Moreon Soft Minusing Mr. B

Interestable processes processes and the control of the control of

Bristian factor architecture (P-C) erticles factor for Aggregate Healing and Burry Man (AP-C) (E, Earlier 11.1.1.1, Naturalize 2001). Factor Total (PC) beneritation from calculations.

inadų serialiam naus ara disemetinadias fallinas: Paulų Deliniams (lybri) – namad serialiams (gyl.), seriasi apamating basas (bo) a 1,000 lie) ma

Annual articles reconstruction of influence.

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Pari Delaniana Paliusana	Visual Chips Consequel or Built Transfer drap 1941	Delation Asser British assert asset (Assert asset)	Survivor of Ecop Valence	imud Intaka 197	Annual Sparreing Heure	Massily Decision Byles
PM.	606,017	6.0011	-	346	4,790	0.67
PMSS	406,017	0.0000	4	134	4,790	0.15
PAGE.	400 117	0.0001	- 6	430	8790	0.00

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											1500]	
				Pole	alam Panlar	(Sebra)			Book	Sam Pol	vilans.	Arms	of Post	olers.		
and a	10000	r hee		Bearing			Annel			PV*0			(MR)		Proposition.	
	(seco/he)	(Managhri)	HJ	PMS5	PULL	ANI	PHICE	PAGE.	щ	MAGG	HALL	PM	HACK	MALE	from Mind	Philips
11-07-380	1995	000146.00	\$20011	2.0000	6,000	6,500.0	0,0000	100000	1100	GOOD!	0.004				Yes.	20%
13-67-3883	100.07		\$20011	2.0000	6,5550	0.0000	CHOOCK	200000	1100	GOOD!	0.004	2407		150	Yes.	20%
HP3	100.07	200146.00	2001	2.5500	6.5554	0.0008	COOCE	0.0004	140	0.000	COOK	22%	247	1.127	Na	960
13-6-5005	100.07	000146.00	98911	2,0005	9,000%	0.0008	0,000%	0.0004	2.442	0.000	000E	227	2477	ij	No.	- 9%
10-01-0008	100.07	000146.00	\$40011	2,0000	9,000%	0.0008	0,000%	0.0004	1.000	COST	0004	2497	=	200	Yes.	20%
10-09-9803-6	100.07	000146.00	\$40011	2,0000	9,000%	0.0008	0,000%	0.0004	1.000	COST	0,000	0.407	:==	100	Yes.	20%
ID-CHORINE	100.07		20011	2.0000	5,5554	6.5558	COOCE	20000	ij	COST	0.004				Van.	20%
13-8-0006 h	100.07		5.8944	1.0000	9,0004	0.000E	G10000A	0.0004	1.100	COST	0.004				Yes.	20%
10-0-0000 A	100.07	000146.00	5,0014	2.0000	9,000%	0.0008	0.000X	0.0004	1.000	0.007	0.004	2407		13/0	Yes.	30%
							_	1000		-	-	4.85	8.54	2.44	-	-

States had be proposed to continue the self-in more continues open or return abeliance, an existing continues of 1941 is and between the interactions.

Land Marrier more by the unique presence specing.

AN MASS MASS RIS RISO MASS

MICCO Plans Sin Swelley Pennis Application December; 2000

Ballatine Calculations for the Parwinding - BICCS - C.S.E. Subs Total 144 Marcan Parking Total 144 Marcan Parking

Table NO. Stange File Wind Bresien

Javes Name	Direct Chip	n. Marage Pile Wind Brasine	BPN	OHPS			
	Proposed MAIRT Units				2/0/2003		
700	_	82%	Air Car	Seminari.	Ba/te	157	
DHPG				PM.	-	0.11	
		DAP4E		Maa	-	0.11	
		I	-	WE-2	-	0.00	

Seem and Parkets Britains from used this strongs and anterior are extinated using the EP-11, bester 18.2.2, industrial Wind Britain, Named 1900 - Busilier (1).

Me-Ohj haded win is officient for Moore Courty, West Propint planest Safe unlimiter paint). Moore and wind year quantiples of Moore 15 mpt to consect the yearly furtherines. Electory plan will be appropried with under an enemany to confident perfect determines.

Schalenberg 1942 januarier (1834, Indicardal Wind Franker, Manawiner 2006 - Equanter (SL) System of waterfall.

Emission facus = k.
$$\sum_{i=1}^{N_c} - P_{\pm}$$

H = eminion from $(y_i = ^{i})y_i|$ h = periods size $x_i(y_i)$ in the (i + i) is size (i + i). If $x_i(y_i)$ is the entire of distributions are specified. H = entire period distributions $y_i(y_i)$ is the distribution (y_i, y_i) is the distribution (y_i, y_i) is (y_i, y_i) in (y_i, y_i) in (y_i, y_i) is (y_i, y_i) in (y_i, y_i) in (y_i, y_i) in (y_i, y_i) is (y_i, y_i) in (y_i, y_i) in (y_i, y_i) in (y_i, y_i) in (y_i, y_i) is (y_i, y_i) in (y_i, y_i) in (y_i, y_i) in (y_i, y_i) in (y_i, y_i) is (y_i, y_i) in (y_i, y_i) in (y_i, y_i) in (y_i, y_i) in (y_i, y_i) is (y_i, y_i) in (y_i, y_i)

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0.40	1.71	1.11	0.31		

No.	- 15	20.49	1.26	0.34	0.06	6.22	6.26	0.00
Mar	- 124	55.18	1.14	0.77	0.40	1.71	1.11	0.31
Ager	28	30.40	1.16	0.34	0.00	640	2.81	0.83
May.		14.44	240	4.13	0.40	0.00	0.00	0.00
lee	- 14	30.16	146	0.81	0.20	1.06	1.00	0.33
W	- 12	18.10	140	0.00	0.00	8.00	0.00	0.00
dag	55	14.78	0.79	4.26	0.06	0.00	0.00	0.00
ing.	10	13.41	0.46	444	0.00	0.00	0.00	0.50
ůe:	55	14.76	0.79	4.50	0.06	8.00	0.00	0.00
Sec	- 13	14.75	146	40.00	0.20	0.00	0.00	0.00
Own	104	30.00	1.08	0.07	0.00	1.00	1.00	0.33

What Brooks Delicions

BIOCS Plan Sh Challey Perroll Application December, 1938

1/0/2023 6 00 PM Berladons CalaulaClaris for the Flavoriting - BICCI - 4.21.23 alon Tablel-3 CityFlavWinGhradon

Table N-6 Ry Ash Handling Process MGS CNP 1, U.C.

Emission Unit	Emission Point	Description	Hourly Rate (tons/hr)	Annual Rate (tons/yr)	Control	Nota
121-CV-4001 A	121-CV-4001 A	PIRF Ash Collection Brag Chain Conveyor A (From boller hopper to surge bin A)	4.5	22420	Covered	
121-CV-4001 B	121-CV-4001 B	PIRF Ash Collection Brag Chain Conveyor & (from boiler hopper to surge bin ©)	45		Covered	
121-5-4002 A	121-5-4002 A	RIFF Ash Collection Surge Bin A	45	29420	NA.	Hoppers are not open to the atmosphere. According to information provided by the
121-5-4002 B	121-5-4002 9	RIFF Ash Callection Suge 8in 8			NA	boller supplier, Eabcock & Wilcox (E&W), the hopper does not produce any emissions.
121-CV-4002	121-CV-4002	PIRF Ash Transport Drag Chain Conveyor (From Surge Bins M1 and M2 to RIFF Ash Transfer Drag Chain Conveyor)	45	22420	Covered	
121-CV-4009	121-0/-4009	RIFF Ash Transfer Drag Chain Conveyor (to Ash Bucket Slevator)	45	29430	Covered	
121-CV-4004	121-CV-4004	Ash Bucket Sevetor	45	29430	Covered	
121-CV-4005	121-0/-4005	Ash Distrubution Drag Chain Conveyor (From Ash Bucket Elexator to Fly Ash Storage Silos)	4.5	29430	Covered	
121-CV-4006 A	121-CV-4006 A	Sconomiser Hopper Ash Drag Chain Conveyor A From Sconomiser Hopper to Sconomiser Hopper Ash Surge Sin A)	13	20008	Covered	
121-CV-4006 B	121-CV-4006 B	Scanomiser Hopper Ash Drag Chain Conveyor B (From Scanomiser Hopper to Scanomiser Hopper Ash Surge Bin B)	33		Covered	
121-5-4009 A	121-5-4002 A	Economiser Hopper Ash Surge Bin A	33	10010	NA.	Hoppers are not open to the atmosphere. According to information provided by the

BBCCS Plant Air Quality Permit Application December, 2024

5/6/2025 3:30 PW Emissions Calculations for Air Permitting - BECCS - 4.18.35 view Table N-5 Ry Ash Handling (1)

Table N-6 Ry Ash Handling Process

MGS CNP 1,	LUC

Emission Unit	Emission Point	Description	Hourly Rate (tons/hr)	(tons/yr)	Control	Note
121-5-4003 8		Sconomiser Hopper Ash Surge Bin B	33			boller supplier, \$5.W, the hoppers will not produce any emissions.

88005 Plant Air Quality Permit Application December, 2024 5/6/2025 2:30 PM Emissions Calculations for Air Parmitting - BECCS - 4.28.25 size Table N-5 Ry Ash Handling (1)

Table N-6 Fly Ash Handling Process MGS CNP 1, LLC

Emission Unit	Emission Point	Description	Hourly Rate (tans/hr)	Annual Rate (tons/yr)	Control	Note
121-CV-4007 A	121-CV-4007 A	Economiser Ash Transport Conveyor A (From Economiser Ash Surge Bin A to Fly Ash Silo A)	33		Covered	
121-0/4007 9		Economicer Ash Transport Conveyor & (From Economicer Ash Surge Bin & to Fly Ash Silo &)		Covered		
121-5-4001 A	121-5-4001 A	Fly Ash Storage Silo A	7.9	68228	Pulse let Filter 121-F-4001 A	
		Fly Ash Storage Silo B	7.8	*****	Pulse let Filter 121-F-4001 B	
121-MK-4001 A	121-MK-4001 A	Pugmili A	7.9	68228	NA	There will be no emissions per 85.W.
121-MK-4001 B	121-MK-4001 &	Pugmili B	7.8	*****	NA	There will be no emissions per saw.
121-71-0001	121-71-0001	Fly Ash Truck Loading	1.5	75226	Wet fly sch, with a moleture content of at least 10%	

86005 Plant Air Quality Permit Application December, 2024 5/6/2025 3:30 PM Emissions Calculations for Air Parmitting - BECCS - 4.18.25-xix: Table N-5 Ry Ash Handling (1)

Table N-G Ry, Inh Handling Present MSS CNF 1, LLC

Registrativistics, see to expected from serveying and transferring of the set that to wind and serveyor vibration.

										Bedades				I			
						nisalan Pa	nten jilde	m)		Short	ban Pak	alen.	Ame	of Probability			
linera	Mesself	Therei	er Sala		Heavily			Accord			99/94			Beyl		Profesion	
	Transler	(Secol(Re))	$Gam_{f}(y)$	Ĕ	PM12	PMEA	PM	PHESO	PHELE	PM	PHISO	PHILLS	Pid	PM32	PMEA	Free Miles	
120-CV-0000 A	1	4.6		0.0000	0.4133	9,9474	0.4943	0.0000	0.0433	2.60T	0.304	1.011	1,700 0.161	1,700 0,141		Yes	60%
125-CV-0000 B	1	4.6	20422	0.0000	0.4100	0.0174	0.1012	0.0000 0.0	1.0411	1.007	0.204	1.011			0.431	Van.	60%
123-07-1803		4.5	20422	1.0118	0.4120	0.2474	0.4942	0.0100	1.0411	1.60T	0.204	1.018	4,700	2.141	0.428	Yes.	60%
123-CV-9508	1	ŝ	30433	1.0118	0.4130	0.0474	0.4943	0.0380	0.0430	1.607	0.384	0.000	4.700	0.141	0.433	Yes.	60%
123-C/-9201		ŝ	20422	1.5111	0.4133	0.0474	0.4943	0.0380	0.0433	1.007	0.304	1.011	4.700	0.141	0.428	Yes.	40%
129-04-0008	1	1	20422	1.0111	0.4133	0.3474	0.4943	0.0000	0.0433	1.007	0.384	1.011	4.700	2.141	0.428	Yes.	40%
123-EV-1808 A	1	11		1.0111	0.4122	0.2474	0.4042	0.0180	1.0411	2.224	0.488	1,011				Yes.	60%
123-CV-0008 B	1	11	28300	0.0000	0.4100	0.0474	0.4040	0.0880	10/11	2.224	0.488	1.000	1.212	1.012 0.002	0.004	Ves	60%
125-CV-0807 A	1	1.2		1.0111	0.4120	0.2474	0.4042	0.0100	1.0411	1.124	0.488	1,021				Yes.	2015.
123-CV-0807 B		11	28300	0.0000	0.4100	0.0474	0.4040	0.0000	1.0411	2.224	0.488	1.000	1.212	0.002	0.004	Van.	88%
125-0-0000 A	1	7.3		1.0111	0.4133	0.2474	0.4042	0.0000	1.0411							e line	
123-0-1201 B		7.2		1.3222	0.4123	0.2474	2,4242	0.0100	1.0411	Note: in periodic autochiless for figure strongs also							
120-91-0000		1.6	70010									de inneis	alas palaviais	en he ly m	h isani in	nthy	
						70536				4.798	2.200	0.242	41,600	2.421	0.110		

^{*} Conign is still in progress. Because Oliver will be common on the corresponder reduce which quark, an exhibitor control of believe of 200 is used in the substitutions.

ission fusion in: Dr. He dail Herillos Franco. Insion ser land on 18-13 minimi Indon in: Agregate Herillog and Stange Plus (18-12 V), dan 18.24.8, Inputins (1), Herender 2008)

orage Wind Spreit is etitalned from US 878.69-43 Table 7.5-7 for Hundington, West Veginia join da estimation point)

Saura Farancian										
Pelleren	Particle One (pm)	i et Sego le Segodo Person	America Materiae Majori	\$						
PM/147	180	1	6.30	9.74						
Ridge.	+ 30	1	6.30	9.85						

[3] 0.018 <0.48 wall-rates the quality order level λ of the equation. The wall-rate constraint the day by such is constraintly convent on in 0.18.

BBCC Plant de Gualdy Parent Application Concretion, 1936

1/0/2013 8.00 PM Ewissians Calculations for Air Parcelling - BICCS - 0.18.13 also Table 190 Pg Ant Mandling (2)

Table N-G Ry Jah Handling Present MSG CNF 1, LLC

Places of Operation	6,760	haurs/poor (24 haurs/stry 2.7 days/south 2.12 souths/year)					
West ignorial description	14	- pir	emous evenege emil highest manabily				
Nighamiklanskiy demografilind Speed of Seco (4)-	44	mpir	menge abdispersis for Fundagean, WV salam from US BNs 43- IS Table 7.3-7.				

Calculations: 47-Chipmoles (4.3-4.5) bytes of expectal

 $Detain[base [b twi] - 1^n] DESC(n) = \frac{\binom{n}{2}}{\binom{N}{2}}$

8 – partido des multiples from AP-15 Escalar IS.1.1.5 U – manufal e alta en accuso (R) 2 – manufal e parti

TD/PHI housig estimates former - [ET1] = [0.0002] = [0.04]([*0.1]0.0]0[*1.0] - 0.0047 [laylor.

Mil_{man}, aminim hour - [0.16] = [0.0007] = [0.44[1]*0.1](0.5]*1.1] - 0.1036 [kg/m.

MA_{MANA} cellulus funor - [0.011] = [0.0111] = [0.0](1)*0.1(0.1(0)*0.0] - [0.0003] [luglas

MA_{man}aranga selialan kanar - (0.18) = (0.0003) = (0.4)(1)*0.1(0.1(0.1)*0.1) - (0.0000) lagtan

| Heliconstant | Heli

SECO Part de Cualdy Parett Application Controller, 2000

3/0/2013 8.00 Min Berlinders Calculations for Air Parcelling - BICCS - 0.12.13 also Table N40 Pg Anti-Mandling (I)

Table N-6 Fly Ash Handling Process MGS CNP 1, LLC

Source Name:	Fly As	rh Storage Silos A & &	EPN:	121-F-4001 A / 121-F-4001 B				
Proposed MAERT	Limits		Date:	5/8/2025				
FIN		EPN	Air Cont	minant	lbs/hr	TPY		
121-5-4001 A 121-5-4001 B			PI	И	0.02	0.05		
		121-F-4001 A / 121-F-4001 B	PIVID		0.01	0.02		
121-5-4	901 B		PIVI	1.5	0.00	0.00		

Creaming description.

Generated fity as high be transferred to true substorage allowus an enclosed conveyor. When a sufficient volume has been collected, the fity ash will be mixed with utility water before removed from the for disposal by trucks.

The emissions from the fly seh allow were conservatively estimated using emission factors for Aggregate Handling and Storage Piles (AP-42 VS, Section 12.1.4.2, Equation (1), November 2005).

The two fly ash slics will be used alternately. Therefore, the annual emissions from the two slics will be permitted under a cap.

Gases and Factors:

The emission factors used to estimate the uncontrolled PM, PM10 and PM2.5 emissions were presented in Table N-5 Fly Ash Handling (2). A filter will be installed on each sile and run continuously, reducing particulate emissions by 95%.

Date:								
Filter control eff	Idlency:	22%						
					Uncont	rolled	Contr	ralled
Pollutant	Emission Fa	ctor [lb/ton]	Feed Rate per Hour	Feed Rate per Year	Hourly Emissions	Annual Emissions	Hourly Emissions	Annual Emissions
	Hourty	Annual	Tons/hr	Tons/yr	lb/hr	TPY	lb/hr	TPY
PM	0.2295	0.1819	7.8	58328.00	1.66	6.21	0.02	30.0
PM10	0.1129	0.0860	7.8	68228.00	0.66	2.94	0.01	0.03
	0.0171	0.0110		*****				

BEDCS Plant Air Quality Permit Application December, 2024

5/6/2025 2:30 PM Emissions Calculations for Air Parmitting - 85005 - 4:28:25.xiox Table N-6 Fly Ash Handling (3)

Table N-6 Fly Ash Handling Process MGS CNP 1, LLC

Source Name:	Fly A	ah Truck Loading	EPN:		121-TL-0001		
Proposed MAERT L	lmite		Date: 5/6/2025				
FIN	\neg	EPN	Air Co	Air Contaminant		TPY	
				PM	0.00	0.01	
121-TL-0001	1	121-TL-0001		M10	0.00	0.01	
	- 1		-	M2.5	0.00	0.00	

Process Description:
Cancersaid fy safe will be transferred to the safe storage allow via a conveying system. When a sufficient routers has been collected, the fly safe will be mised with utility user before removed from site for disposal by trucks. The fly safe will have a minimum molisture content of 10% when based into trucks.

The particulate matter emissions will be controlled by beging high molisture content of the fly

Fly Ash Loading into Trucks

Pollutant	Emission Factor	Ash Produced per Hour	Ash Produced per Year	Hourly Emissions	Annual Emission
	lb/Ton	Tons/hr	Tons/yr	lb/hr	TPY
PM	0.0004	8.6	75226	0.0033	0.01
PMID	0.0002	8.6	75226	0.0015	0.01
PM2.5	0.0000	8.5	75226	0.0002	0.001

Emission Excitors for Drv Biv Ash Handlins Process: Emissions are based on AP-42 emission factors for Aggregate Handling and Storage Plac (AP-42 VS, Section 12.1-4.3, (page) (E), Newmer 2004)

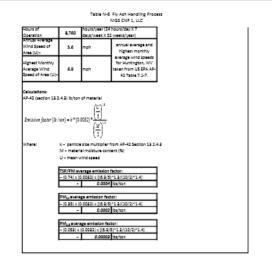
Average Wind Speed is obtained from US SPA AP-42 Table 7.1-7 for Huntington, West Virginia (closest data collection point)

Source Parameters						
Poliutent Star Transfer Moleture (2) [pm] Process Sci@(3)						
PM/TSP	< 20	1	10	0.74		
PM ₂₆	< 10	1	10	0.25		
***	-35		10	0.000		

[1] 0.35% -4.3% maintains the quality rating level A of the equation. The minimum moisture content of the wet fly ash

BECCS Plan Air Quality Permit Application December, 2014

5/6/2025 2:20 PM Emissions Calculations for Air Permitting - 95005 - 4.28.25.dex Table N-6 Fly Ash Handling (4)



BECCS Plant Air Quality Permit Application December, 2014 5/6/2025 2:30 PM Emissions Calculations for Air Parmitting - BECCS - 4.28.25.disx Table N-6 Fly Ash Handling (4)

Table N-7 2 and Handling Frances Mgs CNF 1, LLC

Bellion Ash and Soul Handling France

		Heavily Salls	Annual Sale		
Brokelen Peint ID	Description	15/10+	Spay	Control	Nete
121-01-2001 4	Metaring Conveyor & (Bell Ash Seres A)	1122		Correred	
121-01-0001 8	Metering Conveyor Billion Safe Server B)	1122	****	Cerrened	
151-01-20034	Hitrating Sevence & Descriptions Cottons advantages [1122		Traugh Head (Fertial evaluation)	
131-01-30038	Historiang Servence II (Conseparate Settlers and and sent)	1122	****	Fraugh Head (Fartis) analosses)	
121-0-0001.1	Bellier Ash Dange Bir 6	1000		NL.	No are isolare, are expended that to
121-0-0001 B	Bullion Ash Danage Bir B	1000	2700	NL.	the size of the waterial.
121-0-2022	Sant Secolding Hopper	100000	1723	NL.	
121-01-1004	Indiana Sana Happer Conveyor	100000	1723	Covered	
121-0-2001	Malaup Sand Sile	100000	1722	Year piping to the EFE	
MG	Chule (From Mateup Seed Ste to Seed Bushel Blender)	600	1722	Pull englesses (Figs.)	
121-CV-2008 &	Transfer Conveyor & (Kenyalet Zant) (From Witteling Streemer & De Zant) Bushet Birostor &)	230	1001	Contractorally (perSal resiles or)	
121-CH-2008 B	Transfer Conseyer B (Respuis) Seni) (Fram Villading Seresner B to Seni) Bandof Blansfer B)	230		Contractorally (perSal engineers)	
121-01-5004 4	Savid Bushel Herseler & (Kengaled Sand + Frank Sand)	830		Covered	330 (Ca) for all resistences same + 40) (Ca) for all resistence same
121-CH-2006 B	Sand Bushel Herselar B (Kespulad Sand + Frank Sand)	630	1107	Commend	335 (Ca)for of restained sand + 40) (Ca)for of residency sand
MG	Respuis Jan 2 Citate & (Fram Jan 2 Busin) Bevoler & Challenge (a Beller)	0000 l0s/30 Neuro		Pall medicare (Figs.)	No are induce.
No.	Second Send Chate & Press Send Bushet Bevolut & Chaterys to Belley	0000 ISs/30 Neuro		Pali en elevare (Figur)	No are included.
	121-CH-2008 & 121-CH-2000 E 121-CH-2000 E	101-01-0000 0		Section Princip Co. Section Section	Section Principle Secretary Section Section

BICCI Flant On Sualty Fermit Application Occavior, 2000 3/k/3023-8.60 PM Berlasiana Caleulatiana for dir Parestilag - BICC3 - 0.33.33 also Table N-7 Janii Mandling (1)

Table N-F Sand Handling Presess MISS CNF 3, U.E.

Pugifive amissions can be expected from serveying and transferring of sand due to wind and conveyor's Gratien.

Basis
Perhaduk seriadas han tila und handing process om servedoniy seleculed using accordinate relative balancia AP43 fields \$1,000 for appropria basalan.

									Best	aless.			I	
							Shor	yearn Emil	arciana	40	nual Emissi	one	1	
Janesa	No. of Transfer	Transf	or Sala	Irelat	en Fester J	R/Conj		99/84			David		Prefeation	Chairmy 1
******	Petrila	Dames/Set	(Canadari	FM	F1610	PMXA	P16	PM32	F162.8	PM	FMILE	FW2.8	Steen Wind	
133-CV-8001 A	3	1,125	9955	9,0099	0.0003	0.0009	0.004	0.002	0.002	0.017	0.006	0.009	Yes	20%
133-CV-8001 B	3	1.125	****	0.0099	0.0003	0.0099	0.004	0.002	0.002	0.011	0.000	0.000	Yes	20%
133-CV-8003A	3	1.125	9955	9,0099	0.0003	0.0099	0.004	0.002	0.002	0.017	0.006	0.000	Yes	20%
133-CV-80038	3	1.125	****	0.0099	0.0003	0.0099	0.004	0.002	0.000	0.017			Yes	20%
131-1-1002	1	90	1792	0.0099	0.0000	0.0099	0.545	0.165	0.165	0.006	0.005	0.009	No	996
133-CV-1890	3	90	1792	0.0099	0.0000	0.0000	0.179	0.093	0.069	0.000	0.001	0.001	Yes	20%
133-CV-8008 A	3	0.125	1095	9,0099	0.0003	0.0000	0.000	0.500	0.000				Yes	20%
133-CV-8008 B	3	0.125	7266	0.0099	0.0002	0.0000	0.000	0.000	0.000	0.000	0.001	0.001	Yes	50%
133-CV-8000 A	3	0.925	2947	0.0099	0.0099	0.0000	0.001	0.001	9.001	0.005	0.000	0.002	Yes	50%
125-CV-8000 B	3	0.925	2607	0.0099	0.0099	0.0099	0.001	0.001	0.001	0.006	0.002	0.002	Yes	50%
						TOTAL	0.599	0.396	0.396	0.098	0.024	0.024		

² Design is all in progress. Someon them will be severe on the someopers to reduce wind sport, an emission method of bitmap of 20% is word in the substitute.

BECCS Flori de Gually Formit Application Committee, 2006

3/0/1003 8:00 PM Berlesians Calculations for the Perentting - 8:003 - 0.33.32 also Solde Not Sand Handling (2)

Table N-C Sellum Biss Senate Handling Frances MGS CNF 5, U.C.

			Ready Sale	Annual Refe		
Federales Unit	Bedraine Fele!	Description	19/8+	Spay	Control	Nete
131-0-0001	101-F69-8001; 100-6-1001	Sellum Blanders to Manage Sile	18900		Vent reuted to Seller and sent relied by the Seller PVPF	Bateli operation, ReHCCC will be presentationly Searchered to the allo
131-9-8900 1	121-9-8922-4	Self-les Blackberg to Veril Happer 1.	100	un	Pulsa led Piller 121-9-8822 &	
121-0-0900 8	121-F-8822 B	Self-Len Blook Servate Vent Happer B	320	***	Pulse let Pitter 121-9-8801 B	

BECCI Flant de Quality Fermit Application Desember, 2006

3/0/2003 8:00 PM Emissions Calculations for the Parentting - 88001 - 0.33.32 also Facile R-C NaMCDE Handling (1)

Table N-5 Sodium Sicarbonate Handling Process MSS CNP 1, LLC

Source Name:	urce Name: Sodium Sicerbone(c Vont Hoppors			121-P-9902 A; 121-P-9902 S			
Proposed MAERT Limits			Date: 5/6/2025				
ri ri	N	EFN	Air Conteminent Ibs/hr TP1			TPY	
				PM	1.955-04	8.545-04	
121-F-9902 A; 121-F-9902 B	121-F-9902A; 121-F- 9902 5		PM10	7.505-05	3.298-04		
		9902 6		PM2.5	7.505-05	3.298-04	

From the Naricos 3-lo, Naricos will be greatly fed to the vent happers.
The emissions from the vent happers are estimated using emission factors from Table 11.19.3-2 in Section 11.19.2 of AP-42.

0.039 lb/ton and 0.031 lb/ton are used to estimate the uncontrolled PM and PMILD/PMI.3 emissions. Each vent hopper will be equipped with one filter and will reduce particulate emissions by 90%. To represent worst ease emissions, the maximum bourly emissions for each vent happer are based on the total amount of HAMCOS to flow through the vent happers, rather than aplitting the emissions in half. The annual emissions for both vent happers are permitted under a cap.

or control offic	cioney:	20%					
				Unc	ontrolled	Conti	rolled
Pollutent		Feed Nate per Hour			Annual Emissions	Hourly Emissions	Annual Emissions
	lb/ton	Tons/hr	Tons/yr	lb/hr	TPY	lb/hr	TPY
	0.059	0.05	455.00	0.00195	0.0083	0.0002	0.0009
10	0.015	0.05	435.00	0.00075	0.0053	0.0001	0.0003
2.5	0.015	0.05	435.00	0.00075	0.0053	0.0001	0.0003

SECCS Plant
Ar Quality Permit Application
Cemissions Calculations for Air Permitting - SECCS - 4.28.23.xiax
December, 2004
Table N-0 NamCOS Handling (2)

Table 194 Centing Tower 1988 CMF 1, U.C.

Cooling Tower

One open materiality, independ that and manifester among inversell to include in augmention for injurity's operation. The among inversell have I make

		Confling Terms	
	Probabo Unit 15	(30-07-030)	Sales
	BPN	130-07-6101	
	Sectoration Sale (ggm)	10,700	Rated expensity, Contigo John
1	9-9 (%) ⁴	0.004	Clearly tinfo
1	Hadron 703 (ggm)	6000	
1	Annual Average TCE (1994)	4755	
	langual proposition houses	2780	
	Joseph PM (Belon)	1.41	
ı	No. 70 h-b-1	1.00	
λ	Sup. Philip (block)	1.07	_
1	Nas. Pitris Barro	101	_
10	Plant Geyl	1.00	
1	Jug. PMLE (Bille)	1.22	
1	New PRICATION	1.47	
	PROS Sevi	1.22	

nemetados sello			Geolge Inle
100 (evenge) nake ug water	141	00~	Gasign into
100 (maximum) make an union	1,000	0000	
Manieum TOE	8,000	2070	
Annual Average 100	4700	2000	

Sorbulaire Sain	10,330	m1 hr
Major desaily	2.14 567	lated lated
The -	122.00	grama.
i ke •	-	rain .
Tig -	4000	grama.

Brugins (Pd - Republiker Reis now 10-9% 183), blog 165 winter 100 now (100000)

Reference (f)

Particle Size Calcul	lation (Hourly Max.)*				
Confling Terms Despitel	Alex.		Postlate Size		
(Sel, reference)	(Did, otherway)	(V. Mone, Exceller There)	(Eq., reference)	PRINCESSOR	PROJECTION
- 12	72	50.50	0.010		21.21
40-00	20	AB.00	8.017		
12-66	80	40.00	0.001	73.64	
66 - 146	20	\$10.00	44,797		
412-470	162.6	50.50	10.075		
172-212	585	55.50	50.00		
222-272	200.0	50.50	110.00		
172 - 212	ASS	50.10	60.430		
- 833	222	100.00	68.877		

BBCCS Florit &r Charlify Floridi Application Consection, 2004.

1/0/1000 8.00 PM Berkelana Calculations for the Parenting - BECCI - 0.23.25 also Tubic IMP Cooling Texase

Table 148 Cooling Tower 1688 CMF 1, U.C.

	ilation (Annual Emis.)"				
Confling Terms Despite	Alica		Perfilability follows		
Graphyl	One or	Disk Budien		1	I
(Del. reference)	(Did, with penal)	Pl. Mone. Employ There's	(Da. mineral)	PRINCESSOR	PRINT CHANGE
- 15	7.8	00.00	0.618		
10-22	20	AB.00	0.017		41.00
32-65	20	60.00	ALETY		
60 - 146	20	\$10.00	1200	11.01	
112 - 172	142.2	50.00	18.885		
172-212	202	00.00	10.000		
222-272	363.6	92.00	22,424		
276-828	480	20.10	18,626		
- 835	838	100.00	48.004		

0p - 04" [pelps]" (703) / 4,000,000[^ 4.0

nhane: Sanaily of Vision (pd) -Sanaily of TSS (pg) -TSS is assumed to be undurn effection. 1 22



3/0/2003 a 30 PM Emissions Calculations for the Parentings (BCCI - 0.13.13 also Table 149 Confing Connec

Table N-10s Pugitive Road - Annual MISS CNP 1, LLC

Annual Emission Rate

Unit EI'N	Vehicles Per Day	Hours of Vehicle Traffic (hre/day)	Road Length (miles)	Vehicle Mile I revelled Hourly [VM I /hr]
PM-PlantRd	107	24	0.63	2.81

Constituents	Emission Factor		Average Hourly Emissions	Annual Emissions	
Criteria l'ollutanta	Pactor	Units	(lb/hr)	(ton/yr)	
PM	0.7828	Ib/VMT	2.14	9.38	
PM 2.5	0.0374	IB/VMT	0.11	0.46	
PM 10	0.1525	IB/VMT	0.43	1.55	

Assumptions:
All roads geved
Maximum annual emission rate assumes 107 vehicle/24 hr day.

Mix of vehicles	Average Vehicle Weight	Min Vehicle Weight	Max Vehicle Weight	Unit
4.90%	25.5	24	27	ton
5.55%	30	20	40	ton
94.12%	21.5	15	42	ton
Average weight	32.7			ton

Maximum inside plant speed (posted speed limit) 20 mgh. Number of days with rainfall greater than 0.01 inch is 140 days.

SECCS Plant Air Quality Permit Application December, 2024

5/6/2025 5:50 PM Emissions Calculations for Air Permitting - 86003 - 4.25.25.xisx Table N-10a Pugitive Road -An

Table N-10a Pugitive Road - Annual MGS CNP 1, LLC O.011 Ib/MIT, Particle size multiplier for garticle size range,
0.0006 Ib/MIT, Particle size multiplier for garticle size range,
0.0025 Ib/MIT, Particle size multiplier for garticle size range,
0.0021 Ib/MIT, Particle size multiplier for garticle size range,
2.4 of MIT, Ross surface six listeding
2.3.7 ibin, Average weight of the variatios investing the ross.
115 days, Number of West draw with at least 0.254 mm (0.01 in) of grecipitation during the averaging particle based on Figure 13.2.1-2 in AP-42.
285 days, Number of days in the averaging particle. k for PM k for PM2.5 k for PM10 aL W P (2) PM Average Hourly Emission (lb/hr) = (VMT Hourly) * (EF for PM) (2.79 VMT hr) * (0.7723 lb/VMT) (2.14 lb/hr) * (2.79 VMT hr) * (2.79 VMT h (3) PM Annual Emission (tenlyr) = (PM Hourly Emission * Annual Operation) / 2000 lb/ton (2.17 lb/hr * 5760 yrs) / 2000 lb/ton 9.35 tenlyr Reterences:
(1) APP-2, 13.2.1 Pared Roads
(2) Particle sour multiples, k, from Table 13.2.1-1
(2) Particle sour multiples, k, from Table 13.2.1-1
(3) Roads surface at It backing constant, sill, estimated based on low traffic traval in Table 13.2.1-2 with application of identified controls:

-Paving of all insplict that incates
Posts and from the maximum braining agreed to 20 mgh

SECCS Plant Air Quality Permit Application December, 2024

5/6/2025 5:50 PM Emissions Calculations for Air Permitting - 65CC5 - 4.25.25.tbx Table N-10e Pugitive Acad -An

Table N-10b Fugitive Road - Hourly MGS CNP 1, LLC

		Hours of Vehicle		Vehicle Mile Travelle:
Unit EI'N	Vehicles I'er Day	Iratho	Road Length	Hourly
		(hraldwy)	(miles)	(VM I/hr)
PM-PlantRd	203	10	0.63	12.79

Constituents	Emissio	on hactor	Max Hourly Emrasions
Criteria l'ollutanta	Pactor	Units	(lb/hr)
PM	0.8395	IbIVMT	10.74
PM 2.5	0.0412	BIVMT	0.527
PM 10	0.1879	IbIVMT	2.15

Maximum hourly emission rate assumes 195 vehicle/10 hr day.

Mix of vehicles	Average Vehicle Weight	Min Vehicle Weight	Max Vehicle Weight	Units
2.53%	25.5	24	27	ton
2.03%	20	20	40	ton
98.97%	31.5	15	45	ton
Average weight	32.1			ton

Average weight 32.1

Maximum inside glant speed (goaled ageed limit) 20 mgh.

Number of hours with nainfall greater than 0.01 inch is 0 days.

BECCS Plant Air Quality Permit Application December, 2024

5/6/2025 3:50 PM Emissions Calculations for Air Permitting - 85003 - 4,28,25,xiav Table N-306 Augitive Road -Hr

Table N-10b Fugitive Road - Hourly MGS CNP 1, LLC

Corretante:

k for PM k for PM2.5 k for PM10 sL W P 0.011 In/MIT, Periode size multiplier for genticle size range.
0.00034 In/MIT, Periode size multiplier for genticle size range.
0.00024 In/MIT, Periode size multiplier for genticle size range.
2.4 pm², Passe surface at it leading.
23.1 tinn, Average resigns of the workfolds travelling the road.
0 days, Number of workfolds size will seast 0.234 mm (0.01 in) of great platfold during the averaging genticle.
1 days, Number of days in the averaging gence.

N

[2] PM Hourly Emission (bihr) = [VMT Hourly]* [EF for PM] [12.79 VMT/hr]* (0.2395 lb/WT) 10.74 lbihr

Hatherstow:

(1) APAZ, 13.2.1 Paved Roads

(2) Partice star multiples, k, from Table 13.2.1-1

(3) Roads surface all backing constant, st., assimated based on low ireffic travel in Table 13.2.1-2 with application of identified controls.

"Posts and limit the maximum traveling speed to 20 mgh."

SECCS Plant Air Quality Pormit Application December, 2024

Symptoms according for Air Permitting - 85003 - 4.25.35 day.

Table N-10b Pugitive Road - Hr

Tuble 1913 Finel Real Tanta Beloders MSS CNF 3, LLC

Final rest test seclaims.

Institling and vertice issue from the direct tests over extended using equations and methodology from 20-12 Objects 7.

Institutes are timed and the additional around throughout the sectioning with the restancial companions in the object.

Equipment 10	Description	Tank Type	Timesgliput	Maximum Miling Rate	Warking	Velume	Shell Height/Length	Man. Ulquid Height	Dismeter	Messie	d/insulated	Cardrell
			(04)/51	(886/764)	(041)	(ga)	3	121	(70)	(7/34)	,	
129-449003	America Dange Leek	VerShall	11,145,00	124.70	180	1.112	27.2	14	30	- 74	19.0	Se all remarkers
110-79-9903	Sean Smine Tank	Vertical	7,070.08	1,107.00	7,188	200,723	60	111	60	T	30	in alternations
TOTAL												

BICCS Fard Dr Carelly Fermit Application December, 2018

3/6/2013 840 Feb Britaines Calculations for the Fermi Ding - 88002 - 3.12 23 also Table N-CL FX Tacks (1)

Table N-C1 Fixed Sent Tar-Sa Seriations - Justice Tar-Sa MSS CNF 1, LLC

Company Name	1103 CNF 1, LLC		
3% Name	BICCI First		
Bedwine Unit 10	112-40-8801	112-00-6601	
Statistics	Areiro Materia Tank	Lean Sering Tank	

Tank Type (Vertical or Herisantal)			Vertical Flood Real*	Vertical Plant Ford
Diameter, D		п	10.00	40
Holghi, Hijer longih for fortunatal tanks)		7	13.00	40
Saul Type			Come	Come
Core Soul Slager Journal and Co. (1), 2,	1,	dimensioniess, default 0.0003	0.0003	0.0003
If all Fairs Color			7/40e	7/9/0e
Hell Paint Cardition			Deed	Deed
Real Rain's Color			7/104	7/10ke
Real Feint Centition			Deed	Deed.
Irea Mar Verd Foreuver Intilling, F _{ar} .	Page 1	paig (Sefault is 0.00)	0.08	0.08
bruding that Names Indiag Page	r.,	polg (Sefect is - 0.00)	-0.01	-0.01
Frenzisco of Vapor Space of Normal Conditions, F.	5.	polg (Befault is 0)	0	0
Manimum Diguid Height, H _{ee}	*-	п	12.00	11.00
Minimum Liquid Height, H _{ee}	*	п	1	
Svenege Liquid Height, H _{ee}		ti H _{ee} lt	0.00	10.00
Manieum Haurig Tilraugigud, Q _{iner}	Q _{max}	sey'n-	507.85	1307.00
innual Tilesophysik, G _{eol}	9	only.	308.00	1010.08
Cardinal Type			ME	ML
San Cont Official Control			MG	MA.
Tenš insulažešť			Yes	Yes
·	Too Too Too	*	308.67	308.07
Sand Mandeware Liquid Valuesa, V.,	V.,	24	9601.71	222000.00

Malastellagiasi Dala Dalip Min. Jardinel Temp, T_{est} Dalip Man. Jardinel Temp, T_{est} Dalip Man. Jardinel Temp, T_{est} Dalip Tabal Dalar Installation, II Miningalismis Pressure, F_e

BICCS Fard Dr Carelly Fermit Application December, 2018

3/8/2012 AND FIVE Brokelers Calculations for the Permitting - 88002 - 0.12 22 alone Table (NO.1 M. Tards (2)

Table 1903 Final Start Tanta Berlinians - Amire Tanta

STATE OF STA		10000		 -
	1/100	0.00	LUC.	

Meterial Data					
Warting Law Fraduct Factor, K.	C,	Olevanskeriesa (0.7	The south oils, 1.0 for all office organic	1	1
Tefai Lesses, I., [Eq. 3-3]	4	Sev	L L. + L.	0.003	0.010
Total Lesson, is [Bg. 141]	le .	10/9*	lo - la + las	1.02	32.84
Handing Harage Leases, L., [Fq. 1-1]	ia .	B)pr	L - 100V, W, K, K,	0.00	0.00
Tané Vapor Space Velores, V., (Bg. 3-4)	V _n	rt"	V _e = (c _e /QP _e)H _{es}	713.00	20021.29
Vagent Spaces Cultage, H _{ett} [Sq. 3-00]	×.	п	H ₁₀ = H ₁ = H ₁ + H ₁₀ (northed Santis)	9.30	31.43
Core Seef Outage, H _{ee} (Se, 1967)	×.	п	H _{ea} = H _e /E (some result)	0.30	0.42
Constitution Height, H., [84, 3-68]	٠.	п	H _e <0, F _e (some real)	0.81	1.11
Vagor Space Deputation Paulier, K ₁ (Eq. 2-2)	4	Cimensianiess	$E_{a} = \Delta T_{a}/T_{aa} + (\Delta P_{a} - \Delta P_{a})/(P_{a} - P_{aa})$	0.00	0.00
Vaguer Space Exponenter Forder, K, (Eq. 1-13)	4	Olemensiaeless	K, - D.SCLEAR,	0.00	0.00
Sources Daily Vision Temperature Range, 27, (Be, 3-6)	27,	,	QH:14 0.005="H0.038 H="Q =" 1.3 H= - - 0.005="H0.038 H="Q =" 1.3 H= - 0.005="H0.038 H="Q ="	0.00	0.00
Surrage Daily Vapor Temperature Surge, 27, (Sq. 2-7)	at,	7.	27, - 0.727, +0.03±1	0.00	0.00
Point Seiler & Coury Corney, o. [Tuble 7, 1-0]		Circumstantess		0.17	0.17
Surrage Daily Smillert Temperature Range, SF ₄ (Sq. 3-31)	ST _A	*	$\Delta T_{a} = T_{aa} - T_{aa}$	18.10	38.10
Secretor Sally Havid Sections Temperature, T _{o.} (Eq. 2-21)	-		$\begin{split} T_{a_{i}} &= \{0.3 \cdot 0.3/\} \otimes \mathcal{O}(n_{i}/D) + 0.3/(T_{a_{i}} + \\ \{0.3 + 0.3/(0.3) \cdot n_{i}/D) + 0.3/(T_{a_{i}} + \\ \{0.031 \cdot n_{i}/0.3 \cdot 0.3 \cdot \\ \{n_{i}/D) \cdot n_{i}/(0.3 \cdot 0.0 \cdot n_{i}/D) + 0.3/(0.3 \cdot 0.0 \cdot n_{i}/D) + 0.3/(0.0 \cdot $	208.57	308.27
	l	7		30.00	30.00
	I	°E		10.00	10.00
		K		202.23	218.13
	I	7	T ₁₀ = 0.0T ₁₀ + 0.0T ₁ +0.000ml	308.61	308.67
Storage Sally Liquid Surface Temperature, T _{ob} (Eq. 3-33)	7	7		30.00	30.00
	I -			30.00	30.00
		K		212.53	218.12
April Bull Temperature, T _e (Eq. 1-63)	r.		T ₄ - T ₄₄ + 0.008al	308.01	308.07
		,		20.00	20.00
Surrege Daily Geräller? Temperature, T _{ex} [Eq. 5-80]	T.,	7	$T_{a,a} = (T_{a,a} + T_{a,a})/2$	212-61	313.43
		*	To - To - C. TRAT,	308.67	308.67
in range Sally Minimum Liquid Surface Temperature, $T_{\rm sc}$ (Fig. 7.1-	τ.,	7		30.00	30.00
17)	Ι"	-12		30.00	30.00
		E		212.53	210.13
	I	*	$T_{aa} = T_{aa} + 0.384T_{a}$	308.67	308.67

BICCS Fant to Coulty Fermit application December, 2018

308.07 2/6/2013 8.80 FM Emissions Calculations for the Permitting - 88003 - 3.12 23 also Salle (H-1) FM Tamis (I)

Table 1903 Final Seaf Tanta Behaling - Jeeler Tanta

			MBB CHF 1, LLC					
Greenige Daily Maximum Liquid Surface Temperature, $T_{\rm ex}$ (Fig. 7.2-17)	l	7		30.00	30.00			
		τ.		30.00	30.00			
	l	K		333.55	212.13			
Gally Vagner Freezure Kange, AF, (Bq. 1-9)	27,	pale	$\Delta E_{\gamma} = F_{\gamma \gamma} \cdot F_{\gamma \gamma}$	0.000	0.000			
is the fixed real tank of Sofied or riveled sensitivation?				Ne	Ne			

BICCS Fard Dr Carelly Fermit Application December, 2018

3/6/2013 840 Feb Britaines Calculations for the Fermi Ding - 80021 - 3.12 23 also Table N-CL FX Tacks (2)

Table 1963 Final Seal Tanda Berkelma - Jerico Tanta

Management St. LLC

Breather Vent Persons Setting Sunge, 4P, (Eq. 5-90)	ar _e	proje	$\Delta F_{ij} = F_{ij} = F_{ij}$	0.08	0.00
Vertica Vapor Saturation Funtor, 6, (Eq. 3-21)	K.	Olementeriess	$K_{a} = 1/(1 + 0.0000 R_{ch} H_{ch})$	0.80	0.81
Vager Pressure at the Greenge Daily Liquid Surface Terror, F ₁₀ (for 3410)	***	pain		61631	0.1431
Stant Vaguer Deraity, W., (Sq. 1-63)	W _e	10/10"	W ₁ = (M ₁ P ₁₁)/(KP ₂)	6,749-00	6.789-06
Vapor Malinovice Winight, M., (So. 2-00)	M _v	IQ/IOnmel		18.00	18.00
Scenage Vapor Temperature, T., (8s, 1-83)	т,	*	0.010/4/(0)=/(/0.0/4/0)+0.0/ 0.01_H0.001=/(+ 1,-(0.0 +0.1//0.0/4/0)+0.0/	218.10	318.00
Surrage Vapor Temperature, T., (Bq. 2-83)	т,	· r	T ₁ = 0.7T _{1.0} + 0.8T ₁ + 0.008±1	308.07	308.67
Working Lane, L., (Bo. 2-08)	L,	10/pr	$L_{\alpha} = V_{\alpha} K_{\alpha} K_{\beta} W_{\beta} K_{\alpha}$	1.83	32.84
Number of Turnerous per Pour, N (By. 2482)	N	Circumstantess	N - 8.8000/V _m	1.11	1.30
Warting time Turnerum (automation) feeting K ₀	4	Olementaries		1.00	1.00
Warting Law Product Footer, K _r	κ,	Olemensiaeless		1	1
Tank Manimum Liquid Valums, V _{o.} (Eq. 3-81)	V _{in}	ri"	V ₁₀ - (n/0)0 (H ₁₀ - H ₁₀),	808.90	87089.11
Vertiliting Correction Factor Text (Sq. 3-40)			K_[P_m + P_1]/[P_1 + P_2] > 0.01	1.003	1.003
Vertilating Correction Factor, 6, (Bo. 2-93)	ζ,	Olementieriess		0.892	0.890
Vertilating Correction Factor, 6,	4	Olemenaleniesa	$E_{n} = (3 P_1 + P_n)/(E_n) + P_{n+1}/(P_{n+1} + P_{n-1})$ P_{n+1}	0.812	0.812

Maximum Shart-Term Seriation Rate, L _{max} (In. 1)	-	10/10	$L_{max} = (M_{\gamma} \circ H_{\gamma \gamma} \circ H_{\gamma \gamma})/(K \circ T)$	0.43	1.31
Vager Malessier Weight of the Compound, Mg		IQ/IGmel		18.00	18.00
Manimum Pilling Safe, PS _{ot}		gal/fin		7009.78	68004.00
Good San Constant, K	E.	Qualities got/(News) o	180	30.27	20.27
Ward Case Uquid Surface Temperature, T	T _{ex} + 50	*	ingual or 90 as man, ambient	308.67	308.07
Vagor Pressure of the Turk Contents of Turk	Z.s.	mia		0.13	0.13

Specialist Emissions (133-79-9803)

	121-TO-8801					
	Name Stone $Q \in \mathcal{R}_{A}$	Vagor Pilana Q $T_{\rm eff}$	Vager Place (# T _{ex}	Vagor Phone (2.7 ₁₁₁	Unsentralia	d Emissions
Companiels	with:	wth	wth	with.	[8/6]	Gevi
MBG	0.17	0.31	0.37	0.37	1.208-02	1.788400
MORT.	0.00	0.53	0.00	0.00	3.408-04	1.281-07
TheCore	18.00	89.65	20.40	22.00	0.4301	0.0807

Secretaria Sectionary (1770/00/1700)

					122-10	ares	
	Vapor Place @ 5 ₄	Vagor Phase Q T _{el}	Vagor Phase (# T _{cc}	Vapor Phone @ T	UnsanGraffe	Elekalora Stehalora	
Companiels	with	wth:	wth	uth.	[8/6]	Sevi	
 ned MIA	0.17	0.31	0.37	0.17	2.000-00	3.709-00 n/s/ss	

Biocol <u>Parell</u> Sir Classify Perest Application Decompos₂, 1038 2.88693 2.78693 2/dylgs 2.88694 Britishes Caladidians for Air Permitting - 88003 - 0.18 22-dia Table R-0.1 W Tarris [1]

Table N-C1 Final Sept Tands Serialisms - Legion Tanks Company 1 115

V48 CV 2, LLC									
MORE	0.00	0.00	0.00	0.03	1.079-08	3,458406			
Water	89.00	99.00	89.02	99.02	1.1399	0.0000			

BICCS Fard Dr Carelly Fermit Application December, 2018 3/6/2013 840 Feb Britaines Calculations for the Fermi Ding (1802) - 3.12 23 also Table (HC) FX Tacks (2)

Table 1903 Flori Faul Tarks Beliefers - Myse Fernaue Jeries MOS CAP 1, U.C.

Vagor Pressure Calculations for Tanks 100-70-8801 and 110-70-8801

							P	h _m	P _{res}	ř	Vigor Mann O T _{ex}	tigerPear ⊕T _{er}	Vapor Pranti 207 _m	Vapor Phone (2) T _{em}	Vapor Phone & T _{ca}	Vapor Home Al T _{in}	Yapar Pears & T _{er}	Vapor Phone A T
Companions	99	N/A	ma15.	dimensioning	. 19	19	prin	pole	prin	prin	malk	715	100	200	V66	V66	146	-66
949	42.24	36.00	13.40	1,56005	3004.87	-0.36,046	0.0030486	0.000.0081	3.00000mc	0.0030486	LOTES	14734	0.0766	1,0140	0.3488	0.2488	0.3601	0.3888
USEL*	139.361	26.00	6.00				0.0000460	0.0000981	3.00003804	0.3000461	0.008	1.004	0.000	1.004	0.00	0.36	20	0.36
"Winter"	18.03	13.00	46.77	1.4111	2011200	40404	1.17	0.27	0.17	1.17	86463	86.403	66.63	88.612	99.60	99.60	19.44	18.64
							1.21	0.36	0.44	4.21								
	NEW of Ma	dd Penilon						Vigor Penn	NAME OF TAXABLE PARTY.			MW s	CV-gar-					
	W	36.60			- 1	72734	1.11	0.00	6.18	131	3446	34.66	19.00	34.04				

 $^{2} Posser equation for WD in P_{st} in the conf. In N. P = 324 (44) (243), [exper]/writinal-singularly introduced SPS - 333 (333) and - 325 (343) and - 32$

As in his in accusation public probability (1.100). Temperature using 104.4 or 1112 (c.)

**MERS as a superpression in the 104 on 104 (c.) to 104

MICCO Plans 30-Swalley Permit Application Securitor, 1996

Sylpaces (1004) Bedinders Calculations for the Provincing - MCC1 - C13.5 Early Table (PCC W Toolse)

Note IV-CS Fire Water Floring Wide CHP I, LLC

These will be one detail that the write purey, with arthogold 400 kp. Salle arches of the least is regionard in 15 gap and a time. In continuous agency agency bears of its finishin 100 kely. Beginn will be not (found pure 200 kely).

PIL.	138 F 0400	PPM.	130 P 0400
Paul Tapa.	Clear		
Date	202		
Talkid Francisco			
Paul conservation use Profess.	10.00	Mark Company	
Minut Danilly	7,000	No.	
Paul conservation use Profess.	201.31	in to	
Mary First Hart Carrier (1995).		E-A	
Start based (SSV) and Posting.		MAI DATE:	
Printer Parauguese Chican.	600	,	
Frager, Sardani.	95	100	
Personal Committees.		mile.	
rependant.	1000		
Singlessman per Cylinder	- Military spire		
Company of the Contract of the	1000134	- Newbor	_

Nation:

1-0.000 But in the average healing value of discal and 7.000 larged in the standay of discal as graduality various.

Scales agently fall services per from - (Meetings) (Meeting Meetings are Sulpel (eg)).

		Perdicalization, Worker, (Final Printering)					
Probat	ion Floring 1974	Mara, Warrally	Annual Armana"	Armed			
		Bills.	126	99			
4.0	Springs	1.00	1.03	6/6			
14	Wherte	140	9.00	0.00			
1.2	Shorte	0.00	0.001	0.20			
1.1	Springs	5.50	5.5011	5.00			
4.0	Spring	1.00	0.00	979			
4.00B-00	laborin	9.04	1.00	0.000			
	10 14 13	16 vierte 11 sierte 12 sierte 12 sierte 13 sierte	45 glarte 100 16 clarte 100 11 glarte 100 11 glarte 100 11 glarte 100 15 glarte 100	10 10 10 10 10 10 10 10			

Nation
1. NOT, OC. PM, and NOC entained before any NOT \$0.00000(a) the angless with rained group system from regard to 000 by (NOT MA) but have been an equal to 700 by (NOT MA). NOTE \$0.000 MM, NOTE \$0.000

Table 19-13 File Week Fung. Med DNP 1, U.S.



KW Perkalam kan Pegina.

KAP Perioden Pollmeller

offen Mar Ingul - 432 Milliahr sash anjina Januari Raune (ji Alan Raing - 53.) Pauny dinbalaka - (hia Marilingal - 1888 kwin (a. 1924 (200 Bu) a (1874 - 1888 kwin (1924) Januari Britaniaka - (hia Marilingal - 1888 kwin (a. 1924 (200 Bu) a (1874 - 1888 kwin (1924) Januari Britaniaka - (hia Marilingal - 1888 kwin (a. 1924 (200 Bu) a (1874 - 1888 kwin (1924) Januari Britaniaka - (hia Marilingal - 1888 kwin (a. 1924 (200 Bu) a (1874 - 1888 kwin (1874)

2000	10.7	NAME OF TAXABLE PARTY.	granusers."	see seeps seems."	AND DESCRIPTION	Marian Broken	
	(800,000)	220	4.0.	(Inter)	HAND."	MEL.	
Bankana	140170	APAR SAME BASE STREET	786	0.480734	0.000000	1.48876	
Tanana	440175	ACCR 2009 BATE 1939-	716	50000	0.403/30	440178	
tyons.	140170	APPEARING NATIONAL	788	58000	8.47.8781	120170	
Paggana	140131	APPLE TABLE DATE FROM		58800	Marce	4/10/95	
CAPTER BARRIES	44579	ACCR 2600 BATE 1936.	716	540000	0.44000	444478	
*amananjes	53000	APAR NAME BARRISON.	788	0.799784	0.488781	1.48870	
ARRESTA	75.00	APART TARREST LATER FROM	788	8/19/16	5,000	140176	
American	444111	APAR 2000 BASE 2008.	716	648894	1414191	1/10/06	
NAME OF TAXABLE PARTY.	45,000 %	APAR NAME BATH FROM	788	0.700767	1.879/98	14/176	
TRACTICALISM.	1/11/11	APART TARK BATH FROM	788	0.000000	DARKERS.	1,000,70	
AMERICANISM	44070	ACCR 2009 BATE 1939-	716	5/00/20	540000	144175	
AMERICAN	45,20170	APPLE TABLE DATE FROM	788	1,00710	8.008780	120000	
Charles	141174	APART 2449 1479 21816	786	54000	7.689794	14/178	
23454000014	14/170	A200 200 BATE 1986	716	5488784	5/48/08	443138	
ANDREADS	52939	APAR NAME BARRISON.	788	0.079788	1,41,8787	EFFER	
Awarence	54331	APAR 2008 BATE 2008.	788	440714	SHIP	140172	
Pyrisi	43030	APPENDED NATIONAL	788	5.000-90	520090	1400.00	
BM GGETTHAN	500.00	APPLE TABLE DATE FROM	788	8/10/98	1,479793	DATES	
P253454	14017	ACCUST NAME AND POST OF THE	716	3/3/08	MICH	440070	
MARKET PROPERTY.	447171	APART NAME AND PARTY.	788	10000	0.189793	1.000.00	
MARKET MARKET AND	45,400,10	APAR TARREST APPLICATE.	718	548800	6/18/96	1400.70	

Participation Active
Participation
Pa

Tender Nation Station Sent St. 1941 (2014) Station as a sent of the Control of th

MICCO Plans 30-Swalley Permit Application Securitor, 1996

Egiptoti 140 Aug Beladara Caladariana lar dir Ferenbiling - 1802 - 4.24 Studes Talia 1903 Per Winner Fung

Table N-CE NO Startup Generalar MGS CNF 1, LLC

There will be seen 8.5 final along generator, with presentating © 2227 MB Caller makes of facilization applies will be 40 approximate or less. However, the second is a ferical in 400 keys. Toghes will be seen (mainly para 2000, or later).

135 PKB 5001 PPN. 135 PKB 6001 Anároka, ken kara angina

Related Sec. 3034 nd Type.

Year
Facial Peginne.
Facial Commengation.
Mail Service (Service)
Facial Injury (1995).
Facial Injury (1995).
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Facial Injury (1995).
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Facial Injury (1996).
Facial Injury (1996). 1888 February 1884 February 18

Similard Temperature 80 '9' (0.20 °C Similard Pressure 6 of the Similard Volume 170.40 93 (km sl

				Probabon Value			
Polluteri	Perhaden Park	er Comme	Man. Manually Man Balls	Annual Session	Armel		
NO.	14	nilanto.	441	annual org falts	500 2.47		
en:	2.0	phyter	12.22	1.01	1.44		
PM ***	1.000017	MINUTE.	0.00	0.0011	0.00		
PM IS **	0.000027	MINUTE.	0.00	0.0011	0.00		
PMSA ***	1.000017	MINUTE.	0.00	0.0011	0.00		
PM III 14 PM III 14 VDGood	0.1	giligrin	4.60	0.03	2.72		
ADC.		t·	2.07	1.53	2.14		
802 °	1,009-00	Bilterte	0.00	0.00	0.001		

t hg = 3044 Bluths t SW = 4.244 hg

BICCI Flant the County Ferrett Application December, 2018

a/a/agra nap we Betwiese Calculations for the Permitting - 88003 - 6.33.00 also fails N-01 NO Startup Generales

Table N-03 NO Startup Generalar MSS CNP 1, LLC

Nation

1. MSR, CO | and VDC | and v

Basegle Calculation

4 inn 0.47 inn 5000 inn 51

NAP Probabon, Inco NO Poples

dies Man legat = 43.77 MMELete auch angles Annual Haure () Man Relay = 50.3 kelay : Nelay Meleter () Meleter () Meleter () Held () Meleter () Held

1 Shado, I am San Pagha (27 SSPs)

Pullstant	MAPS *	Perhadian Rantas *	Probabo Poder Balley	MAPs. Per hashed Planter	Mins Henry Probables	Annual Polision	Perhaban	
		British Blacked Ingel)	1	held (Blacked Ingal)	Okfo	(Belge)*	Parel "	
1,1,2,2-Tellerallianes@lanes	Pers.	2.00084		0.00004	7.048-04	1.008-00	4.008400	
1,1,2-Trisfleres/Severi	Pers.	0.0000312		0.0000343	0.308-04	1.448400	4.678400	
1,2-Disflierestflens	Mar	0.0000216		:	0.008+00	0.008+00	0.008+00	
2,2,1-TrimeChylSensons	Ne	1,000-00			0.008400	0.008+00	0.008+00	
3,5,0-Trimethy/Sensors	Mar	1,428-00		:	0.008400	0.008+00	0.008+00	
1,0-Claffereefflame	Ne	0.0000336			0.008400	0.008+00	0.008+00	
,3-Disflierspropane	Ne	0.0000368		:	0.008+00	0.008+00	0.008+00	
3,5,3-Trimethylitensone	Ne	1,000-00		:	0.008400	0.008+00	0.008+00	
,0-8ufablenek	Pers.	2.078-04		2,878-04	0.018-03	2.048404	4.328404	
, D-Civilians programs	Pers.	0.0000364		0.0000384	0.008-04	2.648400	4.308400	
2-fileStyleagefStylewerk	Pers.	1.128-00	9	1.008-00	0.008-04	1.008-00	1.048-00	
1,2,0-Televality(pardament	Fee.	2.008-04		3.808-04	4.048-03	2,478-04	4.048-04	
Lannasi Wenek	Pers.	1,009-00		4.008-00	2,478-00	4.048400	6.70867	
Lauragel Stylewek	Para.	0.008-00	G	0.008-00	1,008-04	0.478400	2,798-00	
LawTat Defty DeV.)	Ten.	1.109-01		1.008-00	1,008-01	0.008+00	4.708400	
LangininK, J	Fee.	2.449-02		8.448-00	1,008-01	0.009+00	1.00840	
lessenti	Pers.	6.608-06		6.408-04	8,708-03	4.208-04	2,478604	
herm(X) hanne Marail.	Para.	1,009-07		4.808-07	2.219-00	1,048-04	1,008-01	
lennitéryment	Ten.	6.488-67		4.408-07	8.008-08	4.408404	2.008/01	
Learning & Commission C	Tee.	4.648-07		4.048405	2.419.48	4.008604	2.000,00	

BICCS Park! Sh Gually Permit Application December, 2001

3/6/2012 AND FIVE Emissions Calculations for the Permitting - BECCS - 1.12 22 along Table W-CS WS Startup Generalism

Table N-02 NB Startup Generales MBS CNF 1, LLC

Pullsteet	MAPS "	Probabon Forder	Probabo Posto Raling	HAPs Perhadon Funtos	Bion Hereily Probables	Annual Polision	Perhaban
		British Blacked Inguity		httl://willings/	(Mrhq)	diggs*	Augi "
lig/angli.	Tes.	2.428-04		2,408-64	4.408-03	2,408/04	4.008404
Marie	Mar	8.648-64			0.008400	0.008+00	0.008+00
halpy hardedy saldedy de	Mar	1.018-01			0.008400	0.008+00	0.008+00
Cardian Tetrashianidak	Para.	0.0000367		0.0000387	7.308-04	1.038-00	4.398400
ChlereCenseneX	Fes.	0.0000004		0.0000304	0.048-04	1.008400	4,008/00
Chieresthane	Mar	1,278-00			0.008400	0.008+00	0.008+00
Chiere/ennii	Pers.	0.0000288		0.0000386	0.618-04	2.838400	4.64860
Dirpunet	Para.	8.008-07		0.008-07	1,378-00	6.008-04	1,428,61
Dyelopovilene	Ne	2.078-04		:	0.008400	0.008+00	0.008+00
Elen	Mer	1,008-01		:	0.008400	0.008+00	0.008+00
Billy Generali	Pers.	1,078-00	ı	1,378-00	7.868-04	1.008-00	4.008-00
ESylana DiSparaiSell	Ten.	0.0000443		0.0000441	0.708-04	4.208400	2,738400
Fluorant/Innet	Fes.	1,148-00	- a	1,448-00	3,408-00	4,408400	0.408401
Numeros	Pers.	0.078-00		0.078-00	1.428-04	0.008-00	2.308-00
Parmatikely Bely I	Fes.	8.008-00	a a	0.208-00	4.048400	2.00 8 +04	2.648-00
MeShanett	Ten.	1.008-01		1.008-00	4.048-03	2,478+00	4,00840
Mathylaysia flansana	Ne	1,008-00	-	:	0.008+00	0.008+00	0.008+0
MeShplama Chiar Bell	Fes.	2.008-00		1,008-00	0.008-04	4,008-00	0.338-00
r-Henaneli	Fes.	1.618-02	-	1,448-00	2,408-03	6.40B+00	0.408404
Namana	Mar	1,108-01		:	0.008+00	0.008+00	0.008+0
-Odare	Ne	1.048-04			0.008+00	0.008+00	0.008+0
-Ferlane	Ne	1.008-01		:	0.008400	0.008+00	0.008+0
Napří Shalemeři	Fas.	7.649-00		7.648-00	5478-03	7.008400	1,008-00
Panex	Pers.	1,009-00		0.008-00	0.308-04	2.008-00	4.338400
Filomani Siramati	Fee.	1,048-00		1.018-00	3,008-04	4.038400	E.148-00
Phoneil	Pers.	2,409-00		1.408-00	4.748-04	0.178400	4.708400
Property	Ne	6,608-00	-	:	0.008+00	0.008+00	0.008+0
Pyramati	Pers.	1,009-00		4.308-00	3,608-00	4.548400	6,708/01
Eprenell.	Yes.	0.0000038	-	0.0000336	4.619-04	2.228-00	4.778400
Telepolitere of Farenti	Pers.	1.409-00		2.418-00	4.008-00	2,488-00	4.008400
Telverell.	Ten.	4.008-04		4.238-04	0.019-03	4.038404	2,008/04
Viryl Chloridati	Pers.	1,409-00		1.408-00	3,008-04	4.878400	7.308-00
BylanaK	Pers.	1,048-04	E .	1.018-04	3.648-03	4.838404	0.008400

* Emission feature district from UE EPA JP-GE Zestion 1.4 Long Enthrony Classifier of DE Enthrony Confuel Engines (1906), Tables 1.49 and 1.44.

*Lines UE EPA Mecentics. In Problems.

**Note: More James and Problems.

**Note: More James and Emission for State (1914) White Meetings Carpetty per Engine (IMELINE)

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**Note: More James James

BICCS Plant: Sir Casality Permit Spyllastian December, 1938

3/9/2013 840 994 Behalem Calculations for the Permitting - BECCI - S.IS Studies Table N-SI NO Marky Generalise

Table N-00 Byulpment Leafs MBS CNP 1, LLC

Company: MGS CNP 1, LLC	
Emission Point IO: 86CCS-FUG	
BBCCS Plant Equip	ment Leaks
HOURS OF OPERATION: 9.750	

Smileten Summery

Polisions	Heavily Embalem Salls Syller	Annual Emission Rate Spy
VDC	1.01	33.40
N×,	0.00	3.06

Sampanenti	Preduct	Companent Count*	100 Smission Sector	Breen Composition, with		Heurly Emissions, 19/hr	
	(Service)		Eg/annyrite	YDE	SH,	Vac	DH,
Valves		м	0.00018			0.01	LAID-CI
Furny Strain		1	0.00868	1	ı	0.01	1.700-01
Compressor Stude	Right Service			ochi	0.00015		
Pressure Relief Haires (Sec. Service)	(Marry May (C)	1	0.304	1 *** ****	0.30	1.309-00	
Singer		100	0.00111	1	ı	0.80	1.008-01
Open-entiret Lines		13	0	1		0.00	0.008400
Valves		430	0.00018			0.10	-
Furen Senis	\blacksquare	10	0.00860	1	ı	0.09	
Compressor Socia	Lean Amine			475	Ι.		
Francisco Ratio Citations (San Service)	(Weavy Mayolit)		0.304	475		2.80	-
Sieges		1803	0.00033	1	ı	1.27	-
Open-ended Lines *		100	0			0.00	-
Valves			0.00087			0.01	
Furny Strain]	ı		
Compressor Statis	Network Ser		0.121	12%	Ι.	0.00	-
Pressure Ratiof Halors	(2m)		0.304		Ι ΄	0.00	
				1			

BICCL Flori Dr Chally Fermit Application December, 2018

3/6/2013 auto Per Britaines Calculations for the Permitting - 88003 - 3.12 d'ains Salte Prote Springer Marita

Table N-04 Squipment Louis MBB CNP 1, LLC

			mad one a, and				
Companied	Preduct	Comparent Count	100 Emission FeeCor ²	Bream Composition, with		Mauriy Emissions, 19/hr	
	(Service)		Eg/amprile	YDC	м,	Vac	NK,
Valves		39	0.00018			0.01	
Parent Strain	Oleval (Henry Unjuil)	- 1	0.00800	1	1	221	
Compressor State				180%	l		-
Pressure Relief Halous (San Service)		,	0.300			0.20	
Parps		100	0.00133			0.66	-
Opermended Lines *						0.00	-
Valves		- 61	0.00408				1,239-01
Farey State	I	1	0.0189	1	l		3.399-00
Sawaranar Janis	Squeeza Sermania			1 .	22%		-
Francuse Relief Helms. (See Service)	(Light Liquid)	4	0.304	1 .	12%		3.389-01
Parge		232	0.00033		I		1.279-01
Open-ended Lines *		56	0				0.000400
	TeCal Heart	y Berkelman, Kjille				1.11	0.00

BICCL Flori Dr Chally Fermit Application December, 2018

3/6/2010 AND FM Britishers Calculations for the Permitting - 88003 - 0.12 23 along Table W-00 Replement Leads

Polat House, Enterior spice

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Table N-15 Degraded Amine Truck Loadout MGS CNP 1, LLC

Track Landous of Degraded Archine
Overfloor
Degraded unifor removed from the recisioning ayean will be loaded official by roucks. Natificum garmic calculations are based on 2000 barnels ger
pass. For heavily maximum, the loading rate is 100 GPM (100 barnels perhoun), MELI's used to regresser the archine.
Derivations Methodology:
Derivation Methodology:
Derivation

 $L_{\rm L} = 12.46 \frac{S \times P \times M}{T}$ AP-42, Section 5.2 6/04, Equation 1

- 12.66 T where the control per 1000 gallons (bH15 pa) of liquid leased (b. Loading leas, pounds per 1000 gallons (bH15 pa) of liquid leased S = 1 assertation flower (based on right and service of leaded vessel). P= The reage represent of liquid leaded, pounds per agrams both absolute N = melacitars region of liquid leaded, and per personnel (blowder). T = sample serve of liquid leaded, TR = sample serve of liquid leaded,

Physical and Chemical Properties:

Emission Unit ID	True Vapor Pressure ⁴ (pola)	VIV of Vagors ⁴ (b / lb-mole)	Loading Loss (ib/10 ² gal)	Notes
VOC - Amine -LOOD	0.0027	91.09		Submerged Loading: dedicated normal service, Uncontrolled

Infoughput and Linkson	ens:				
Emission Unit ID	Max Hourly Mgaller		Max Hourly Vagor Released (lb / hr)	Maximum Annual Vagor Ralesced (lb/yr)	Notes
VOC - Amine - LOGO	9.3	44	0.015		Submerged Loading: dedicated normal service, Uncontrolled

Degraded Amine loading		
	Amazonea.	Maylenus

Emissions	àserage	Maximum	Maximum
	Ib/hr	lb / hr	tone /pr
UDC - Amine -LOAD	0.000000	0.045	0.00040

BECCS Plant Air Quality Permit Application December, 2014

Table N-15 Degraded Amine Truck Loadout MGS CNP 1, LLC

Calculation of MEA vapor pressure

					,		
[Components	WW	Wt.Si	melli	dimensioniess	[*]	CKI
[MEA ²	61.09	100.00	100.00	4.29252	1409.87	-115.093

BECCS Plant Air Quality Permit Application December, 2024

5/8/2025 2:30 PM Emissions Calculations for Air Permitting - SECCS - 4:28 25 size Table N-15 Amine Loadout

 $[\]frac{P_{\rm ML}}{r}$ 0.0025644 pets 3 Pressure equation for MEA is $P_{\rm ML}$ in that and T in "K. P = 10" (A-4)(C=T)). [https://webbook.nist.gov/cg/cbook.cg/HC=C1414358.html=48Type=AHTCHSEAFict=on). $P_{\rm ML}$ in that is converted to pets by multiplying 14-50277. Temperature range (228.6 to 444.1) K.

National Community of the Market State (Market State)

Genellane	Nanause Transver Para		DH4	(15A)5000			
Proposal Units			See:	(4)200			
	N	H	Jily Core	pringer"	lin/hr1	900	
				4	18.	120	
12744	>cc.	12740-0111	8	150	141	236	
ı				o ^a	8.15	687	

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65001 Flow de Coulley Ferreis Sppilanter Polyany, 2008

3/14/0001 1008 144 Berkelens Dissipations for the Providing - MEDIA-TITISOSIANS Transport (CANADA)

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SHEHOOS:			That City Bod Bud and Sal Sales	202	OH LOCALITY	2000-10-Date to Date Disc			
01-6-001	(2)-80000000 a- (2)- 7-(20)	ILIGEOGRAPHIC Print B	biding Smillin	2024	817ando	ESS OF SER. ESS OF OR SAME Codys ESS OF Terfor Co.			
CH64001	1		Calum Stantoners Energy City	204	ISS State	Smithdedon SSS-4E-Skyllebon Spinion			
Steens Steeling Frame									
11-48-101		11/00/01/12	Diames Senting Degree 100.	204	Dill seader				
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is-eviiii	(SHOWN SE	151-074301-38	Carryor is then Steman Southing	202	1012F waste	Coresi			
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io-enillo		101-01400-00	Compart Character Seattle	202	10427 waste	Cornel			
	ISHCUMOS.		Dage (III) a dang No						
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			D-000.4						
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in-evenia			Dagge D o Sinnes Dud Lineing Sin						
			0.000.3						
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Carre.	ane:	G80-0	Theat Chips Descript Dis	SEM .		×.			

			Pyriot. Economics side Should	Chees.		
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D-ENIII S	ISHOVAGE S	D-CNEL1-D	DIT side Californian Ding: Clarks Cannopae 2 (Samikada na magashin 2)	553	All sande	Cornel
in-ev-min	ISHOVADS.	101-07-000-10	2007 Add Texasyon Dany Chain Carroyer (Steen Danys Bern 1) and 15 as 2007 Add Texasion Dany Chain Carroyse)	254	All smale	Cornel
D-C/-IIII	ISHOWOS:	10-05-00-00	0.00 Adi Tanada Ging Glade Carregue (a Adi Sudan Sinera)	SEM SEM	All smale	Cornel
D-ENER	ISHOWNESS	101-07-001-00	Add Station Showner	202	All smale	Cornel
осми	ISHOWOM	IS-CHIRA	ndi Disebular Dag Dala Caragar George Dala Dassers By Ad- George Dal	202	All smale	Cornel
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o-eners	IS-CV-607 B	S-CNET1-0	Canamian Ad Tempor Compar D Gran Canamian Add Days De Din Dy Add Din Dy	202	12 unde	Grand
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	Series Advant Start Starting Press						
O-CNEE A	ISHOWESSIA	131-07408-4-09	Disease Company (Sel Advisor A)	2024	COST State	Cornel	
ici-ensis	(SH20/400) B	131-01403-1-09	Silenting Company (Spile Add CommS)	SEM	COST State	Cornel	
in-evens.	ISHCI/HOSEA	EHC/40034-ED	Vilening Samuer A ju separa kasan ah andranij	203	COST State	Serial Statemen	
in-ensis	II-OHOD	131-074003-15	Vilening Sensor S jos separa laman nit ani ani)	2024	COST Sector	Designational (Seein)	
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O-CNEE	101/201/004	ISHONISH-19	Industrial Days Garage	2004	di sande		
121-64001	(0)4960(00); (0)7400(121-002-000(-02	biological Dis	204	El made PEl majo		
io-eniica	ID-CV400 A	ID-CHEE4-IB	Transfer Conveyor A (Conyoled Cont) Chem Willester, Constant And Cont Contant Constant A	552	600 BeOrleys	Derici Dadarum	
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13H84885.A	1210-00EA	11/0-000 A-10	Salan Sharkanar Van Sagar A	SEM	Di Bale	31 C1-0-00E4
13-641003	12/0/0012	11/0/0015-20	Colum Stantoners Ver Linger S	2024	Di Bale	3E 01-01023
			Orders Pales Source			
30-274001	постен.	130-07-001-09	Caddy Terus	204	MAG gas	os.
No Daniel	SHOWER	NATIONAL D	Trush Zand Trejsh e Derinsken Derinsken	202	lde 20 oblike pe Sep George 10 oblike pe Sep	XA.
20/19/002	(E)*T0-000(120/79(400) - 20	omheliliting Teli	SEM SEM	BB pt (max)	364 364
22-731-001	(E)*T0-000(120/79(400) - 20	Commission Total	SEM SEM	210,000 pd (mar)	364 364
20-0-102	1200-0421	(00000-0	Die View Dang	one one	4113	364 364
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(SOMMINGS)	10014441000	100466600-0	Their Landson of Degraded Austra	SEM SEM	AT SQUID	36A
PRIOW!	irrescous.	IMEDIE-B	Vicence Transact State	304	Ell Myslyr Latherstyley	K.
			Trade			
20-731-0102	IDPTR-04DI	120-750-002-29	Direct Tarks	2024	Midge (may	ж.
10000000	120/00/2013	(5)(0)(0)(0)(1-0)	Statement Amba Tara	202	A ARR gall (man)	x.

CBI Claim Info 4/30/2025

Thursday, May 1, 2025

8:04 AM





Rule 31 CBI

1 message

Andrews, Edward S <edward.s.andrews@wv.gov> To: Michael Dearing <Michael.Dearing@erm.com>

Wed, Apr 30, 2025 at 12:34 PM

Here is a link to our Rule 31 regarding CBI Claims with our office.

https://dep.wv.gov/daq/rulessummary/Documents/2024%20Final%20Rules/45-31.pdf

The items applicant's either overlook or fail to satisfy are 4.1.b. and 4.1.c.

Please look over the pdf at this link regarding filing a claim, which includes a sample form.

https://dep.wv.gov/daq/Documents/Longview%20Power/Claim%20of%20Confidentiality%203%2023%20202.pdf

Should you have any questions, please let me know.

Thanks, Ed

Edward Andrews, P.E.
Engineer
WVDEP/Division of Air Quality
304-414-1244
601 57th Street, SE
Charleston, WV 25304

Inc Email 4/22/2025

Tuesday, April 22, 2025 3:21 PM



Incomplete App Email

1 message

Andrews, Edward S <edward.s.andrews@wv.gov>

Tue, Apr 22, 2025 at 3:20 PM
To: William Calhoun <jack.calhoun@fidelisinfra.com>, Michael Dearing <Michael.Dearing@erm.com>
Cc: Joseph R Kessler <joseph.r.kessler@wv.gov>

RE: Application Status: Incomplete MGS CNP 1, LLC/BECCS Plant Permit Application No. R13-3708 Plant ID No. 053-00134

Mr. Calhoun:

Your application for a construction permit for a steam to electric generation facility was received by this Division on February 24, 2025, and assigned to the writer for review. Upon initial review of said application, it has been determined that the application as submitted is incomplete. It has been determined that the application as submitted is incomplete based on the following items:

1. Missing an discussion on the purpose (e.g. sell of electricity) of the excess electricity generated by the proposed boiler/steam turbine generator. If your proposed generation is to be used for a data center or other use that requires a redundant (backup) supply of electrical, please identify this alternative/backup source of electricity for the primary end user. This discussion needs to clearly answer whether the electricity is being sold, the planned amount of electricity to be sold, is there a purchase power agreement in place, please note the source of required electricity for normal startup operations will be purchased/supplied from local electricity wholesaler/another generating unit, and the nameplate rating of the generator. Please note if the facility is going to be connected to the electrical grid system (e.g. PJM), please explain the relationship (e.g., solely purchaser/consumer, wholesaler/generator).

Please note the amount of excess steam will be utilized to provide heat energy for the amine regenerator (temperature and pressure is also needed). Please provide details of the energy consumption of the facility, type of energy consumed (e.g. electricity, steam, natural gas) for the CO2 dehydration unit and compression and whether these energy requirements for these activities will be part of the auxiliary load of the facility or require additional combustion units.

The DAQ has an unclear understanding of what will be the source of the electricity to start the proposed emissions units. Please keep in mind, the emergency engine for the emergency generator can only be operated for 50 hours per year of non-emergency use. This discussion needs to describe the electrical system that the steam turbine/generator will be connected to and the source of the electricity needed for normal startup/shutdown operations. Please explain in further detail exactly how the fluidized bed boiler will be preheated for startup with the use of steam from an auxiliary boiler or other steam generator.

2. Missing completed individual control device sheets for the SCR, OxyCat, Wet FGD, and DSI for the boiler. Please identify key parameters that will be monitored to ensure compliance with the proposed emissions with respect to the pollutant(s) being controlled by the associated control device. Also, provide additional information regarding your proposed wet FGD system to determine if the residual moisture exiting the scrubber will pose a possible interference issue with a

continuous opacity monitoring system as required in 45CSR2 and 45CSR2A. Given that the application is proposed to be a synthetic minor source under the Title V Program, please provide a monitoring plan for the CO Catalyst, Wet FGD and DSI control device to ensure compliance with proposed emission limits.

- 3. Please provide supporting information to support the claim that the proposed fuel will have sulfur content to satisfy the exemption criteria of 40CFR60.42b(k)(2). Regarding the wood (primary fuel) to be used as fuel for the boiler, the application does not identify the source(s) and species of wood to be used as fuel. If the source(s) of the wood fuel is going to be discarded from a manufacturing process, this/these source(s) of wood need to be identified and evaluated whether the material is a waste/fuel in accordance with 40 CFR 241.
- 4. Please separate the startup emissions for control devices that the performance is impacted/cannot be operated during startup conditions (e.g. SCR, oxidation catalyst, wet FGD) on startup event basis. If a control device performance is impacted during an shutdown, thus shutdown emissions on a short term basis needs to be identified as well. Any by-passing of a proposed control device needs to be identified for startup and shutdown events. Please define the ending of a startup event. The emission calculations are based on NG firing for 10 hours per startup and a total of 55 hours per year for start operations. This accounts for 5 startup events per year with 5 hours unaccounted for. Please explain these 5 unaccounted for hours per year for startup and are the emissions based on firing 100% wood for these hours on an uncontrolled basis.
- 5. Please justify reducing the organic HAPs emission factors published in AP-42 by 88% for the use of CO catalyst when the VOC removal efficiency of 60% for the CO catalyst was applied to account for the control VOC emissions for the boiler.
- 7. Regarding haul road emissions: Please provide the minimum and maximum weight of the vehicles for each of the percentiles used to determine the average weight of the vehicle, and justification of the silt loading. Did the average weight of the vehicles and distance traveled account for equipment used to manage the open stockpile? Given that all haul roads are proposed to be paved, is the open stockpile going to be located on a paved surface?
- 8. Please provide additional details on how the HCl emissions from the wastewater treatment unit were determined and how these HCl emissions will be determined when the wastewater treatment unit is in operation.

Please address the above deficiencies in writing by no later than May 12, 2025. Application review will not commence until the application has been deemed to be technically complete. Failure to respond to this request in a timely manner may result in the denial of the application.

Should you have any questions, please contact Ed Andrews at (304) 926-0499 ext. 41244 or reply to this email.

Edward Andrews, P.E.
Engineer
WVDEP/Division of Air Quality
304-414-1244
601 57th Street, SE
Charleston, WV 25304

053-00134 IPR 13-3708 Page 78

Affidavit 3/2/2025

Thursday, April 3, 2025 10:49 AM



RE: WV DAQ Permit Application Status for MGS CNP 1, LLC; BECCS Plant

1 message

Michael Dearing <michael.dearing@erm.com>

Wed, Apr 2, 2025 at 4:35 PM

To: "Mink, Stephanie R" <stephanie.r.mink@wv.gov>, "jack.calhoun@fidelisinfra.com" <jack.calhoun@fidelisinfra.com> Cc: Joseph R Kessler <joseph.r.kessler@wv.gov>, "Andrews, Edward S" <edward.s.andrews@wv.gov>, Gregory L Null <gregory.l.null@wv.gov>, Casey M Samples <casey.m.samples@wv.gov>, Kathy M Sullivan <kathy.m.sullivan@wv.gov>

Hello,

Attached is the affidavit for this application.

Thanks



Michael Dearing

Managing Consultant, Scientist

Charleston WV

erm.com

0 +1-(612)-347-7144

C +1-(304)-654-2227

From: Mink, Stephanie R < stephanie.r.mink@wv.gov>

Sent: Tuesday, February 25, 2025 9:04 AM

To: jack.calhoun@fidelisinfra.com; Michael Dearing <michael.dearing@erm.com>

Cc: Joseph R Kessler <joseph.r.kessler@wv.gov>; Andrews, Edward S <edward.s.andrews@wv.gov>; Gregory L

Null <gregory.l.null@wv.gov>; Casey M Samples <casey.m.samples@wv.gov>; Kathy M Sullivan

<kathy.m.sullivan@wv.gov>

Subject: WV DAQ Permit Application Status for MGS CNP 1, LLC; BECCS Plant

You don't often get email from stephanie.r.mink@wv.gov. Learn why this is important

EXTERNAL MESSAGE

Application Status

MGS CNP 1, LLC; BECCS Plant Facility ID No. 053-00134 Application No. R13-3708

Mr. Calhoun:

Your application for a Construction Permit for the BECCS Plant was received by this Division via email on February 24, 2025 and was assigned to Ed Andrews. The following items were not included in the initial application submittal:

Copy of Class I legal advertisement affidavit.

Application fee of \$4,500.00.

- Credit card payments may be made by contacting the Accounts Receivable section at 304-926-0499 x 41195. DEP accepts Visa and MasterCard only. Please have the Facility ID and Application Number available when calling.
- Checks may be sent by mail. You must include the Facility ID Number and Application Number on the check as an identifier. A check may be mailed to:

WVDEP - DAQ - Permitting ATTN: NSR Permitting Secretary 601 57th Street, SE Charleston, WV 25304

These items are necessary for the assigned permit writer to continue the 30-day completeness review.

Within 30 days, you should receive notification from Ed Andrews stating the status of the permit application and, if complete, given an estimated time frame for the agency's final action on the permit.

Any determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit decision.

Should you have any questions, please contact the assigned engineer, Ed Andrews, at 304-926-0499 x41244.

Stephanie Mink

Environmental Resources Associate

West Virginia Department of Environmental Protection

Division of Air Quality, Title V & NSR Permitting

601 57th Street SE

053-00134_IPR_13-3708 Page 81

Charleston, WV 25304

Phone: 304-926-0499 x41281

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25033EE0 - Affidavit - ERM Mason Co - River Cities Tribune.pdf 94K

25033EE0 -Affidavit -...



25033EE0 -Affidavit -...

PUBLISHER'S CERTIFICATE

Tamra lawson

Classified Manager of THE RIVER CITIES TRIBUNE, a newspaper of general circulation published in the city of Gallipolis, Gallia Co. OH, Pomeroy, Meigs Co. OH, and Point Pleasant, Mason Co. WV, County and state aforesaid, do hereby certify that the annexed:

25033EE0 Environmental Resources Management

A## 1465369

was published in THE RIVER CITIES TRIBUNE 1 time(s) commencing on 03/18/2025 and ending on 03/18/2025 at the request of

WV PRESS ASSOCIATION LEGAL NOTIC.

Given under my hand this 03/18/2025.

The publisher's fee for said publication is: \$30.23.

Classified Manager of THE RIVER CITIES TRIBUNE

Subscribed to and sworn to before me this 03/18/2025

Notary Public in and for Gallia, Meigs and Mason Counties

My commission expires on

day of

OTTONAMA.

20 30

AIR QUALITY PERMIT NOTICE Notice of Application

Notice is given that MGS CNP 1, LLC has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Construction Permit for a Biomass-Energy and Carbon Capture Sequestration Plant located off of WV Poute 62, near Point Pleasant, in Mason County, West Virginia. The facility will be utilized primarily in the production of carbon closing removal (CDR) credits with future power/steam generation. The latitude and longitude coordinates are: 38.92450, -82.10822.

The applicant estimates the potential to discharge the following Regulated Air Pollutants will be: Nitrogen Oxides, 90.95 tons per year (TPY); Carbon Monoxide, 48.46 TPY; Vota-tile Organic Compounds, 55.27 TPY; Sulfur Dioxide, 55.27 TPY; Particulate Matter-10, 83.35 TPY; Total Hazardous Air Pollutants, 24.00 TPY.

Startup of operation is planned to begin on or about the 15th day of November, 2028. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 801 57th Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice. Written comments will also be received via email at DEPAirQualityPermitting@WV.gov.

Any questions regarding this permit application should be directed to the DAO at (304) 925-0499, extension 41281, during normal business hours. Dated this the 6th day of February 2025.

By: MGS CNP 1, LLC Jack Calhoun Vice President 109 Post Oak Lane, Suite 140 Houston, TX 77024

Ad#1465369

Additional Info 4/3/2025

Thursday, April 3, 2025

10:51 AM



RE: Application Status for 13-3708

1 message

Michael Dearing < Michael. Dearing@erm.com>

Thu, Apr 3, 2025 at 9:51 AM

To: "Andrews, Edward S" <edward.s.andrews@wv.gov>, William Calhoun <jack.calhoun@fidelisinfra.com> Cc: Joseph R Kessler <joseph.r.kessler@wv.gov>, Jonathan Rosenbaum <laura.m.crowder@wv.gov>

Ed,

I sent the affidavit in yesterday. Also, I have attached the list of question you sent 3/31/25 with responses from the team at Fidels. Some of the question we were unsure how to answer and may require a meeting to discuss.

Thanks



Michael Dearing

Managing Consultant, Scientist

Charleston WV

erm.com

0 +1-(612)-347-7144

C +1-(304)-654-2227

From: Andrews, Edward S <edward.s.andrews@wv.gov>

Sent: Friday, March 21, 2025 11:14 AM

To: William Calhoun <jack.calhoun@fidelisinfra.com>; Michael Dearing <Michael.Dearing@erm.com> Cc: Joseph R Kessler <joseph.r.kessler@wv.gov>; Jonathan Rosenbaum <laura.m.crowder@wv.gov>

Subject: Application Status for 13-3708

Mr. Calhoun;
···································
Our office has not received a copy of the affidavit of publication and therefore your application cannot be deam complete at this time.
We do have some concerns/questions with the application as follows, which need to be addressed/answered, which we can do during my site visit on Monday, March 25, 2025.
Attach is a word file of these concerns/issues/questions.
At this time, I feel that the monitoring for the proposed boiler is going to depend on whether the boiler is subject to the Acid Rain Program. Thus, the agency needs to know the capacity of the generator and whether the electricity generated by your proposed generator is going to be sold.
I would like to mention to you that 45CSR30.2.2. defines an affected source as a source that includes one or more affected units under 45CSR33 and Title IV of the Clean Air Act (Acid Deposition Control). Section 3.2. does not exclude "affected sources" that are non-major sources under 45CSR30 from the permitting requirements of Title V.
" 3.2. Exemptions and deferrals.
3.2.a. Except as provided in section 4, all sources listed in subsection 3.1 that are not major sources, affected sources, or solid waste incineration units required to obtain a permit pursuant to §129(e) of the Clean Air Act may be deferred by the Secretary on a specific source category basis from the obligation to obtain a Title V operating permit under this rule. Any such deferral by the Secretary shall be consistent with the timetable established by the U.S. EPA for non-major sources to which this rule applies except as provided under subdivision 4.1.a."
As part of my review, I will review EPA's past Acid Rain Applicability Determinations whether your proposed boiler is an "affected source" under the Acid Rain Program (Title IV of the CAA) before making any applicability determination regarding your permit application. https://www.epa.gov/acidrain/acid-rain-program-applicability-determinations
Should you have any questions, please let me know.
Thanks,
Ed

You don't often get email from edward.s.andrews@wv.gov. Learn why this is important

EXTERNAL MESSAGE

Edward Andrews, P.E.

Engineer

WVDEP/Division of Air Quality

304-414-1244

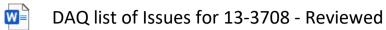
601 57th Street, SE

Charleston, WV 25304

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DAQ list of Issues for 13-3708 - Reviewed.docx 27K



DAQ list of Issues/Concern/Questions regarding Permit Application 13-3708 for MGS CNP1/BECCS Plant.

- Parts of the application are blacked out and there is no claim of "confidential business information" in the February 24, 2025, submittal. (e.g., MSDS for natural gas (sweet), SOS Business Certificate)
 - This was not meant to be confidential information, but rather a generic SDS for natural gas in the area.
- Under Section 4.8.4. of the application, the application notes that the electricity is being sold. The electricity generated by the proposed boiler being sold needs to be clearly answered. Please clarify this. Also, keep in mind this answer impacts the proposed boiler with the interstate trade rules (e.g., acid rain).
 - Electricity will not be supplied to the grid. Rather steam generated from the combustion of the biomass can be sent to the STG to produce the hotel load for the facility. Excess steam can bypass the STG and be condensed. In future activities, this steam can be added to STG to create additional electricity as required for future projects.
- 3. The application under the EUDS for the boiler notes that NOx and CO2 CEMS will be utilized for monitoring NOx emissions. Given that your proposed unit will include a CO2 adsorber to remove carbon dioxide the location of the NOx CO2 CEMS needs to be upstream of the CO2 adsorber to properly monitor NOx emissions.
 - In the configuration, the approach is through the DCC, Absorber and then wash column. The DCC will control the emissions, and the amine in the absorber will react with the oxides present in the flue gas to create degraded products. The monitoring arrangement is setup to capture the stream after the absorber as NOx and other pollutants including NH3 are expected to be lower exit the absorber due to reaction and only control.
- 4. After Table N-1 BFB (pdf page 183) is a table of summary of stack data, the significance of the data or how the data was used with respect to this application to be explained.
 - o Table N-1 is detailed description of the values used in the MAERT table along with the emission data source (i.e., vendor data/guarantee).
- 5. Did H2SO4 emission rates for the boiler consider the use of the DSI control device?
 - o Yes, DSI controls are considered.
- 6. Would the H2SO4 emissions be knocked out in the CO2 adsorber?
 - o No, the DCC will knock out the H2SO4 but to be conservative, the H2SO4 is shown as a pass through.
- 7. Did the HCl emission rates for the boiler consider the use of the wet scrubber? If not, explain why.
 - No, the DCC will knock out the HCL but to be conservative, the HCL is shown as a pass through.
- 8. The application lacks specific monitoring of the control devices for the respective pollutants except for NOx emissions. The DAQ would prefer to separate the control device sheet for each of the different types of control device. The exception could be made for dual catalysts (SCR and oxidation catalyst integrated into a single bed configuration) style control device. Information needed in the application from these sheets is needed to

develop clear set points for the permit when these controls are in operation (e.g., end of startup and when shutdown begins).

- o This topic needs further discussion with DEP to get clarity
- 9. Also, NOx mass emission needs to be accounted for under the Acid Rain and to ensure that the facility does not trigger the Title V major source status.
 - Nox is list in lbs./day and tons/yr in emission calculations. We are unsure of the location of this comment.
- 10. Does the PM rate of 67.83 tpy for the boiler in the summary table on PDF page 172 include condensable PM?
 - o Yes, this does include condensable PM.
- 11. There is clearly a great deal of effort put into this application. However, most of my concerns in the application are focused on monitoring emissions/control devices with regards to NOx, CO, SO2, and HCl.
 - o Is there a related question for this item?
- 12. The application does not contain supporting information that the SO2 potential of the fuel (e.g. sulfur content of the fuel) for the boiler will be below 0.32 lb/MMBtu to satisfy the exemption under 40CFR60.42b(k)(2).
 - MGS CNP has a representative wood analysis sample where SO2 would be less than
 0.1 lb./MMBtu emitted.

App Status 2/25/2025

Wednesday, April 2, 2025 7:58 AM



WV DAQ Permit Application Status for MGS CNP 1, LLC; BECCS Plant

1 message

Mink, Stephanie R <stephanie.r.mink@wv.gov>

Tue, Feb 25, 2025 at 9:03 AM

To: jack.calhoun@fidelisinfra.com, michael.dearing@erm.com

Cc: Joseph R Kessler <joseph.r.kessler@wv.gov>, "Andrews, Edward S" <edward.s.andrews@wv.gov>, Gregory L Null <gregory.l.null@wv.gov>, Casey M Samples <casey.m.samples@wv.gov>, Kathy M Sullivan <kathy.m.sullivan@wv.gov>

Application Status MGS CNP 1, LLC; BECCS Plant Facility ID No. 053-00134 Application No. R13-3708

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--

Stephanie Mink

Environmental Resources Associate

West Virginia Department of Environmental Protection

Division of Air Quality, Title V & NSR Permitting

601 57th Street SE

Charleston, WV 25304

