

AQMD Excess Emissions Calculations - NOx

AQMD Original Calculations

Actual Emissions: Dryer and RTO NOx:			
Parameter	Value	Units	Basis/Comment
2021 Stack Test Result (concentration corrected to 3% O2)	39.73	ppm	The 2021 test report indicates 41.6 ppm as left, corrected to 3% O2; there appears to be an error/typo; their starting concentration appears inconsistent with the 2021 test report
Convert ppm to volume fraction	1.00E-06	conversion	Constant is used when converting 3% O2 corrected concentrations back to actual stack concentrations. 20.9/(20.9-3) Converts the 3% O2 concentration back to an actual concentration before multiplying by stack gas generation
Oxygen Correction Equation	1.1676	conversion	generation
F-factor nor Natural Gas	8710	dscf/Mmbtu	EPA Method 19
Higher Heating Value of Natural Gas	1050	MMBtu/MMscf	
Conversion to pounds	0.121372032	conversion	Converts lb-moles of NOx to pounds (46/379)
Actual NOx	51.49	lb NOx/MMscf	pounds NOx per million scf of natural gas
Monthly NOx (Actual)			
Parameter	Value	Units	Basis/Comment
Fuel Usage	26.72	MMscf/month	Air Permit Fuel Restriction is 13.36 MMscf/month for each unit x 2 = 26.72 MMSCF/month.
Rule 1147 NOx Limit	51.49	lbs NOx/MMscf	
Total Monthly NOx	1375.86	lbs NOx/month	Fuel Usage x Rule 1147 NOx Limit
Rule 1147 Emissions: Dryer and RTO NOx:			
Parameter	Value	Units	Basis/Comment
NOx Combined Limit	28.8	ppm	Rule 1147 concentration for NOx limit; combined stack limit
Convert ppm to volume fraction	1.00E-06	conversion	Constant is used when converting 3% O2 corrected concentrations back to actual stack concentrations. 20.9/(20.9-3) Converts the 3% O2 concentration back to an actual concentration before multiplying by stack gas generation
Oxygen Correction Equation	1.1676	conversion	generation
F-factor nor Natural Gas	8710	dscf/Mmbtu	EPA Method 19
Higher Heating Value of Natural Gas	1050	MMBtu/MMscf	
Conversion to pounds	0.121372032	conversion	Converts lb-moles of NOx to pounds (46/379)
Rule 1147 NOx	37.33	lb NOx/MMscf	pounds NOx per million scf of natural gas
Monthly NOx (Rule 1147)			
Parameter	Value	Units	Basis/Comment
Fuel Usage	26.72	MMscf/month	Air Permit Fuel Restriction is 13.36 MMscf/month for each unit x 2 = 26.72 MMSCF/month.
Rule 1147 NOx Limit	37.33	lbs NOx/MMscf	
Total Monthly NOx	997.3534715	lbs NOx/month	Fuel Usage x Rule 1147 NOx Limit
Actual/Rule 1147 Difference			
Parameter	Value	Units	Basis/Comment
Actual Emissions	1375.862966	lbs NOx/month	
Rule 1147 Emissions	997.3534715	lbs NOx/month	
Monthly Excess Emissions:	378.5094946	lbs NOx/month	
Daily Excess Emissions:	12.61698315	lbs NOx/day	Monthly emissions / 30 days month

AQMD Excess Emissions Calculations - CO

AQMD Original Calculations

Actual Emissions: Dryer and RTO CO:

Parameter	Value	Units	Basis/Comment
2021 Stack Test Result (concentration corrected to 3% O ₂)	1231	ppm	The 2021 test report indicates 1231 corrected to 3% O ₂
Convert ppm to volume fraction	1.00E-06	conversion	Constant is used when converting 3% O ₂ corrected concentrations back to actual stack concentrations. 20.9/(20.9-3) Converts the 3% O ₂ concentration back to an actual concentration before multiplying by stack gas generation
Oxygen Correction Equation	1.1676	conversion	EPA Method 19
F-factor nor Natural Gas	8710	dscf/Mmbtu	
Higher Heating Value of Natural Gas	1050	MMBtu/MMscf	
Conversion to pounds	0.073878628	conversion	Converts lb-moles of CO to pounds (28/379)
Actual NO_x	971.13	lb NO_x/MMscf	pounds NO_x per million scf of natural gas

Monthly NO_x (Actual)

Parameter	Value	Units	Basis/Comment
Fuel Usage	26.72	MMscf/month	Air Permit Fuel Restriction is 13.36 MMscf/month for each unit x 2 = 26.72 MMSCF/month.
Rule 1147 CO Limit	971.13	lbs CO/MMscf	
Total Monthly CO	25948.66	lbs CO/month	Fuel Usage x Rule 1147 CO Limit

Rule 1147 Emissions: Dryer and RTO CO:

Parameter	Value	Units	Basis/Comment
CO Combined Limit	1000	ppm	Rule 1147 concentration for NO _x limit; combined stack limit
Convert ppm to volume fraction	1.00E-06	conversion	Constant is used when converting 3% O ₂ corrected concentrations back to actual stack concentrations. 20.9/(20.9-3) Converts the 3% O ₂ concentration back to an actual concentration before multiplying by stack gas generation
Oxygen Correction Equation	1.1676	conversion	EPA Method 19
F-factor nor Natural Gas	8710	dscf/Mmbtu	
Higher Heating Value of Natural Gas	1050	MMBtu/MMscf	
Conversion to pounds	0.073878628	conversion	Converts lb-moles of CO to pounds (28/379)
Rule 1147 CO	788.90	lb CO/MMscf	pounds NO_x per million scf of natural gas

Monthly NO_x (Rule 1147)

Parameter	Value	Units	Basis/Comment
Fuel Usage	26.72	MMscf/month	Air Permit Fuel Restriction is 13.36 MMscf/month for each unit x 2 = 26.72 MMSCF/month.
Rule 1147 CO Limit	788.90	lbs CO/MMscf	
Total Monthly CO	21079.33062	lbs CO/month	Fuel Usage x Rule 1147 CO Limit

Actual/Rule 1147 Difference

Parameter	Value	Units	Basis/Comment
Actual Emissions	25948.65599	lbs CO/month	
Rule 1147 Emissions	21079.33062	lbs CO/month	
Monthly Excess Emissions:	4869.325373	lbs CO/month	
Daily Excess Emissions:	162.3108458	lbs CO/day	Monthly emissions / 30 days month

ReConserve Excess Emissions Calculations - NO_x (ACTUAL) Based on Proposed Worst-Case Fuel Usage (25,185 therms)

Actual Emissions: Dryer and RTO NO_x:

Parameter	Value	Units	Basis/Comment
2021 Stack Test Result (concentration corrected to 3% O ₂)	41.6	ppm	The 2021 stack test report
Convert ppm to volume fraction	1.00E-06	conversion	Constant is used when converting 3% O ₂ corrected concentrations back to actual stack concentrations. 20.9/(20.9-3) Converts the 3% O ₂ concentration back to an actual concentration before multiplying by stack gas generation
Oxygen Correction Equation	1.1676	conversion	EPA Method 19
F-factor nor Natural Gas	8710	dscf/MMbtu	
Higher Heating Value of Natural Gas	1050	MMBtu/MMscf	
Conversion to pounds	0.121372032	conversion	Converts lb-moles of NO _x to pounds (46/379)
Actual NO_x	53.92	lb NO_x/MMscf	pounds NO_x per million scf of natural gas

Monthly NO_x (Actual)

Parameter	Value	Units	Basis/Comment
Fuel Usage	2.4	MMscf/month	Based on January 2026 Worst-Case Fuel Usage; Proposed fuel restriction (25,185 therms)
Rule 1147 NO _x Limit	53.92	lbs NO _x /MMscf	
Total Monthly NO_x	129.40	lbs NO_x/month	Fuel Usage x Rule 1147 NO_x Limit

Rule 1147 Emissions: Dryer and RTO NO_x:

Parameter	Value	Units	Basis/Comment
NO _x Combined Limit	28.8	ppm	Rule 1147 concentration for NO _x limit; combined stack limit
Convert ppm to volume fraction	1.00E-06	conversion	Constant is used when converting 3% O ₂ corrected concentrations back to actual stack concentrations. 20.9/(20.9-3) Converts the 3% O ₂ concentration back to an actual concentration before multiplying by stack gas generation
Oxygen Correction Equation	1.1676	conversion	EPA Method 19
F-factor nor Natural Gas	8710	dscf/MMbtu	
Higher Heating Value of Natural Gas	1050	MMBtu/MMscf	
Conversion to pounds	0.121372032	conversion	Converts lb-moles of NO _x to pounds (46/379)
Rule 1147 NO_x	37.33	lb NO_x/MMscf	pounds NO_x per million scf of natural gas

Monthly NO_x (Rule 1147)

Parameter	Value	Units	Basis/Comment
Fuel Usage	2.4	MMscf/month	Based on January 2026 Worst-Case Fuel Usage; Proposed fuel restriction (25,185 therms)
Rule 1147 NO _x Limit	37.33	lbs NO _x /MMscf	
Total Monthly NO_x	89.58264714	lbs NO_x/month	Fuel Usage x Rule 1147 NO_x Limit

Actual/Rule 1147 Difference

Parameter	Value	Units	Basis/Comment
Actual Emissions	129.397157	lbs NO _x /month	
Rule 1147 Emissions	89.58264714	lbs NO _x /month	
Monthly Excess Emissions:	39.81450984	lbs NO_x/month	
Daily Excess Emissions:	1.327150328	lbs NO_x/day	Monthly emissions / 30 days month

ReConserve Excess Emissions Calculations - CO

Based on Proposed Worst-Case Fuel Usage (25,185 therms)

Actual Emissions: Dryer and RTO CO:

Parameter	Value	Units	Basis/Comment
2021 Stack Test Result (concentration corrected to 3% O ₂)	1231	ppm	The 2021 test report indicates 1231 corrected to 3% O ₂
Convert ppm to volume fraction	1.00E-06	conversion	Constant is used when converting 3% O ₂ corrected concentrations back to actual stack concentrations. 20.9/(20.9-3) Converts the 3% O ₂ concentration back to an actual concentration before multiplying by stack gas generation
Oxygen Correction Equation	1.1676	conversion	EPA Method 19
F-factor nor Natural Gas	8710	dscf/MMbtu	
Higher Heating Value of Natural Gas	1050	MMBtu/MMscf	
Conversion to pounds	0.073878628	conversion	Converts lb-moles of CO to pounds (28/379)
Actual NOx	971.13	lb NOx/MMscf	pounds NOx per million scf of natural gas

Monthly NOx (Actual)

Parameter	Value	Units	Basis/Comment
Fuel Usage	2.4	MMscf/month	Based on January 2026 Worst-Case Fuel Usage; Proposed fuel restriction (25,185 therms)
Rule 1147 CO Limit	971.13	lbs CO/MMscf	
Total Monthly CO	2330.72	lbs CO/month	Fuel Usage x Rule 1147 CO Limit

Rule 1147 Emissions: Dryer and RTO CO:

Parameter	Value	Units	Basis/Comment
CO Combined Limit	1000	ppm	Rule 1147 concentration for NOx limit; combined stack limit
Convert ppm to volume fraction	1.00E-06	conversion	Constant is used when converting 3% O ₂ corrected concentrations back to actual stack concentrations. 20.9/(20.9-3) Converts the 3% O ₂ concentration back to an actual concentration before multiplying by stack gas generation
Oxygen Correction Equation	1.1676	conversion	EPA Method 19
F-factor nor Natural Gas	8710	dscf/MMbtu	
Higher Heating Value of Natural Gas	1050	MMBtu/MMscf	
Conversion to pounds	0.073878628	conversion	Converts lb-moles of CO to pounds (28/379)
Rule 1147 CO	788.90	lb CO/MMscf	pounds NOx per million scf of natural gas

Monthly NOx (Rule 1147)

Parameter	Value	Units	Basis/Comment
Fuel Usage	2.4	MMscf/month	Based on January 2026 Worst-Case Fuel Usage; Proposed fuel restriction (25,185 therms)
Rule 1147 CO Limit	788.90	lbs CO/MMscf	
Total Monthly CO	1893.353049	lbs CO/month	Fuel Usage x Rule 1147 CO Limit

Actual/Rule 1147 Difference

Parameter	Value	Units	Basis/Comment
Actual Emissions	2330.717604	lbs CO/month	
Rule 1147 Emissions	1893.353049	lbs CO/month	
Monthly Excess Emissions:	437.3645544	lbs CO/month	
Daily Excess Emissions:	14.57881848	lbs CO/day	Monthly emissions / 30 days month

ReConserve Excess Emissions Calculations - NO_x

Based on Current Variance Condition #2

Actual Emissions: Dryer and RTO NO_x:

Parameter	Value	Units	Basis/Comment
2021 Stack Test Result (concentration corrected to 3% O ₂)	41.6	ppm	The 2021 stack test report
Convert ppm to volume fraction	1.00E-06	conversion	Constant is used when converting 3% O ₂ corrected concentrations back to actual stack concentrations. 20.9/(20.9-3) Converts the 3% O ₂ concentration back to an actual concentration before multiplying by stack gas generation
Oxygen Correction Equation	1.1676	conversion	EPA Method 19
F-factor nor Natural Gas	8710	dscf/MMbtu	
Higher Heating Value of Natural Gas	1050	MMBtu/MMscf	
Conversion to pounds	0.121372032	conversion	Converts lb-moles of NO _x to pounds (46/379)
Actual NO_x	53.92	lb NO_x/MMscf	pounds NO_x per million scf of natural gas

Monthly NO_x (Actual)

Parameter	Value	Units	Basis/Comment
Fuel Usage	1.71	MMscf/month	5/27/2026 Current Variance Condition #2 (18,000 therms/month)
Rule 1147 NO _x Limit	53.92	lbs NO _x /MMscf	
Total Monthly NO_x	92.20	lbs NO_x/month	Fuel Usage x Rule 1147 NO_x Limit

Rule 1147 Emissions: Dryer and RTO NO_x:

Parameter	Value	Units	Basis/Comment
NO _x Combined Limit	28.8	ppm	Rule 1147 concentration for NO _x limit; combined stack limit
Convert ppm to volume fraction	1.00E-06	conversion	Constant is used when converting 3% O ₂ corrected concentrations back to actual stack concentrations. 20.9/(20.9-3) Converts the 3% O ₂ concentration back to an actual concentration before multiplying by stack gas generation
Oxygen Correction Equation	1.1676	conversion	EPA Method 19
F-factor nor Natural Gas	8710	dscf/MMbtu	
Higher Heating Value of Natural Gas	1050	MMBtu/MMscf	
Conversion to pounds	0.121372032	conversion	Converts lb-moles of NO _x to pounds (46/379)
Rule 1147 NO_x	37.33	lb NO_x/MMscf	pounds NO_x per million scf of natural gas

Monthly NO_x (Rule 1147)

Parameter	Value	Units	Basis/Comment
Fuel Usage	1.71	MMscf/month	5/27/2026 Current Variance Condition #2 (18,000 therms/month)
Rule 1147 NO _x Limit	37.33	lbs NO _x /MMscf	
Total Monthly NO_x	63.82763609	lbs NO_x/month	Fuel Usage x Rule 1147 NO_x Limit

Actual/Rule 1147 Difference

Parameter	Value	Units	Basis/Comment
Actual Emissions	92.19547435	lbs NO _x /month	
Rule 1147 Emissions	63.82763609	lbs NO _x /month	
Monthly Excess Emissions:	28.36783826	lbs NO_x/month	
Daily Excess Emissions:	0.945594609	lbs NO_x/day	Monthly emissions / 30 days month

ReConserve Excess Emissions Calculations - CO

Based on Current Variance Condition #2

Actual Emissions: Dryer and RTO CO:

Parameter	Value	Units	Basis/Comment
2021 Stack Test Result (concentration corrected to 3% O ₂)	1231	ppm	The 2021 test report indicates 1231 corrected to 3% O ₂
Convert ppm to volume fraction	1.00E-06	conversion	Constant is used when converting 3% O ₂ corrected concentrations back to actual stack concentrations. 20.9/(20.9-3) Converts the 3% O ₂ concentration back to an actual concentration before multiplying by stack gas generation
Oxygen Correction Equation	1.1676	conversion	EPA Method 19
F-factor nor Natural Gas	8710	dscf/MMbtu	
Higher Heating Value of Natural Gas	1050	MMBtu/MMscf	
Conversion to pounds	0.073878628	conversion	Converts lb-moles of CO to pounds (28/379)
Actual NO_x	971.13	lb NO_x/MMscf	pounds NO_x per million scf of natural gas

Monthly NO_x (Actual)

Parameter	Value	Units	Basis/Comment
Fuel Usage	1.71	MMscf/month	5/27/2026 Current Variance Condition #2 (18,000 therms/month)
Rule 1147 CO Limit	971.13	lbs CO/MMscf	
Total Monthly CO	1660.64	lbs CO/month	Fuel Usage x Rule 1147 CO Limit

Rule 1147 Emissions: Dryer and RTO CO:

Parameter	Value	Units	Basis/Comment
CO Combined Limit	1000	ppm	Rule 1147 concentration for NO _x limit; combined stack limit
Convert ppm to volume fraction	1.00E-06	conversion	Constant is used when converting 3% O ₂ corrected concentrations back to actual stack concentrations. 20.9/(20.9-3) Converts the 3% O ₂ concentration back to an actual concentration before multiplying by stack gas generation
Oxygen Correction Equation	1.1676	conversion	EPA Method 19
F-factor nor Natural Gas	8710	dscf/MMbtu	
Higher Heating Value of Natural Gas	1050	MMBtu/MMscf	
Conversion to pounds	0.073878628	conversion	Converts lb-moles of CO to pounds (28/379)
Rule 1147 CO	788.90	lb CO/MMscf	pounds NO_x per million scf of natural gas

Monthly NO_x (Rule 1147)

Parameter	Value	Units	Basis/Comment
Fuel Usage	1.71	MMscf/month	5/27/2026 Current Variance Condition #2 (18,000 therms/month)
Rule 1147 CO Limit	788.90	lbs CO/MMscf	
Total Monthly CO	1349.014048	lbs CO/month	Fuel Usage x Rule 1147 CO Limit

Actual/Rule 1147 Difference

Parameter	Value	Units	Basis/Comment
Actual Emissions	1660.636293	lbs CO/month	
Rule 1147 Emissions	1349.014048	lbs CO/month	
Monthly Excess Emissions:	311.622245	lbs CO/month	
Daily Excess Emissions:	10.38740817	lbs CO/day	Monthly emissions / 30 days month

ReConserve Excess Emissions Calculations - NO_x (ACTUAL)

Based on Proposed Fuel Usage Request (21,500 therms)

Actual Emissions: Dryer and RTO NO_x:

Parameter	Value	Units	Basis/Comment
2021 Stack Test Result (concentration corrected to 3% O ₂)	41.6	ppm	The 2021 stack test report
Convert ppm to volume fraction	1.00E-06	conversion	Constant is used when converting 3% O ₂ corrected concentrations back to actual stack concentrations. 20.9/(20.9-3) Converts the 3% O ₂ concentration back to an actual concentration before multiplying by stack gas generation
Oxygen Correction Equation	1.1676	conversion	
F-factor nor Natural Gas	8710	dscf/Mmbtu	EPA Method 19
Higher Heating Value of Natural Gas	1050	MMBtu/MMscf	
Conversion to pounds	0.121372032	conversion	Converts lb-moles of NO _x to pounds (46/379)
Actual NO_x	53.92	lb NO_x/MMscf	pounds NO_x per million scf of natural gas

Monthly NO_x (Actual)

Parameter	Value	Units	Basis/Comment
Fuel Usage	2.05	MMscf/month	Based on requested therms of 21,500
Rule 1147 NO _x Limit	53.92	lbs NO _x /MMscf	
Total Monthly NO_x	110.53	lbs NO_x/month	Fuel Usage x Rule 1147 NO_x Limit

Rule 1147 Emissions: Dryer and RTO NO_x:

Parameter	Value	Units	Basis/Comment
NO _x Combined Limit	28.8	ppm	Rule 1147 concentration for NO _x limit; combined stack limit
Convert ppm to volume fraction	1.00E-06	conversion	Constant is used when converting 3% O ₂ corrected concentrations back to actual stack concentrations. 20.9/(20.9-3) Converts the 3% O ₂ concentration back to an actual concentration before multiplying by stack gas generation
Oxygen Correction Equation	1.1676	conversion	
F-factor nor Natural Gas	8710	dscf/Mmbtu	EPA Method 19
Higher Heating Value of Natural Gas	1050	MMBtu/MMscf	
Conversion to pounds	0.121372032	conversion	Converts lb-moles of NO _x to pounds (46/379)
Rule 1147 NO_x	37.33	lb NO_x/MMscf	pounds NO_x per million scf of natural gas

Monthly NO_x (Rule 1147)

Parameter	Value	Units	Basis/Comment
Fuel Usage	2.05	MMscf/month	Based on requested therms of 21,500
Rule 1147 NO _x Limit	37.33	lbs NO _x /MMscf	
Total Monthly NO_x	76.5185111	lbs NO_x/month	Fuel Usage x Rule 1147 NO_x Limit

Actual/Rule 1147 Difference

Parameter	Value	Units	Basis/Comment
Actual Emissions	110.5267383	lbs NO _x /month	
Rule 1147 Emissions	76.5185111	lbs NO _x /month	
Monthly Excess Emissions:	34.00822716	lbs NO_x/month	
Daily Excess Emissions:	1.133607572	lbs NO_x/day	Monthly emissions / 30 days month

ReConserve Excess Emissions Calculations - CO

Based on Proposed Fuel Usage Request (21,500 therms)

Actual Emissions: Dryer and RTO CO:

Parameter	Value	Units	Basis/Comment
2021 Stack Test Result (concentration corrected to 3% O ₂)	1231	ppm	The 2021 test report indicates 1231 corrected to 3% O ₂
Convert ppm to volume fraction	1.00E-06	conversion	Constant is used when converting 3% O ₂ corrected concentrations back to actual stack concentrations. 20.9/(20.9-3) Converts the 3% O ₂ concentration back to an actual concentration before multiplying by stack gas generation
Oxygen Correction Equation	1.1676	conversion	EPA Method 19
F-factor nor Natural Gas	8710	dscf/MMbtu	
Higher Heating Value of Natural Gas	1050	MMBtu/MMscf	
Conversion to pounds	0.073878628	conversion	Converts lb-moles of CO to pounds (28/379)
Actual NOx	971.13	lb NOx/MMscf	pounds NOx per million scf of natural gas

Monthly NOx (Actual)

Parameter	Value	Units	Basis/Comment
Fuel Usage	2.05	MMscf/month	Based on requested therms of 21,500
Rule 1147 CO Limit	971.13	lbs CO/MMscf	
Total Monthly CO	1990.82	lbs CO/month	Fuel Usage x Rule 1147 CO Limit

Rule 1147 Emissions: Dryer and RTO CO:

Parameter	Value	Units	Basis/Comment
CO Combined Limit	1000	ppm	Rule 1147 concentration for NOx limit; combined stack limit
Convert ppm to volume fraction	1.00E-06	conversion	Constant is used when converting 3% O ₂ corrected concentrations back to actual stack concentrations. 20.9/(20.9-3) Converts the 3% O ₂ concentration back to an actual concentration before multiplying by stack gas generation
Oxygen Correction Equation	1.1676	conversion	EPA Method 19
F-factor nor Natural Gas	8710	dscf/MMbtu	
Higher Heating Value of Natural Gas	1050	MMBtu/MMscf	
Conversion to pounds	0.073878628	conversion	Converts lb-moles of CO to pounds (28/379)
Rule 1147 CO	788.90	lb CO/MMscf	pounds NOx per million scf of natural gas

Monthly NOx (Rule 1147)

Parameter	Value	Units	Basis/Comment
Fuel Usage	2.05	MMscf/month	Based on requested therms of 21,500
Rule 1147 CO Limit	788.90	lbs CO/MMscf	
Total Monthly CO	1617.239063	lbs CO/month	Fuel Usage x Rule 1147 CO Limit

Actual/Rule 1147 Difference

Parameter	Value	Units	Basis/Comment
Actual Emissions	1990.821287	lbs CO/month	
Rule 1147 Emissions	1617.239063	lbs CO/month	
Monthly Excess Emissions:	373.5822236	lbs CO/month	
Daily Excess Emissions:	12.45274079	lbs CO/day	Monthly emissions / 30 days month