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Docket A-92-55  
Entry II-B-8

**MEMORANDUM**

From: William H. Maxwell *WHM*  
CG/ESD (C439-01)

To: Utility MACT Project Files

Subject: Analysis of variability in determining MACT floor for coal-fired electric utility steam generating units

Although EPA is confident that the data available are representative of the industry, it is evident that the test report data exhibit a significant degree of variability, even within a given subcategory. The EPA decided it was necessary to develop a methodology to address the multiple sources of the observed variability in order to assure that an emission limitation value could be derived that would be achievable. The origins of variability and approaches available for addressing the apparent variability found in the test data are described below.

Variability is inherent whenever measurements are made or whenever mechanical processes operate. The variability in the emission test data may arise from one or more of the following areas: (1) the emission test method(s); (2) the analytical method(s); (3) the design of the unit and control device(s); (4) the operation of the unit and control device(s); and (5) the amount of the constituent being tested in the fuel.

Test and analytical method variability can be quantified by statistical analysis of the results of a series of tests. The results can be analyzed to establish confidence intervals within which the true value of a test result is presumed to lie. Confidence intervals can be estimated for multiple-run series of tests based on the differences found from one test run to the next, with only the upper confidence interval having meaning (signifying the chance of the standard being exceeded).

When testing is done at more than one unit, similar confidence intervals can be established to account for the variability from unit-to-unit. One can combine the test-to-test and unit-to-unit variability into a single factor that can be applied to reported test values to give an upper limit for the likely true value. One can also estimate the combined factor for any desired confidence level.

Testing for a short time may not reveal the range of emissions that would be found over extended time periods. Normal changes in operating conditions or in fuel characteristics may affect emission levels. For example, an increase in the mercury (Hg) content of the fuel being fired in a unit may tend to increase the Hg emission rate from the associated stack. Mercury emission rates may also change with unit loads. As load changes, so does gas flow rate through the air pollution control device (APCD) downstream from the unit. Changes in gas flow rate may affect APCD effectiveness.

Variability may be addressed in a number of ways, depending on the circumstances existing within the source category. For example, different test run results can be analyzed statistically to arrive at an upper limit that represents the highest likely value for each test planned for use in setting emission limits. The poorest-performing (worst-case) unit in the top 12 percent of each subcategory can be reviewed to determine the causes of poor performance with a factor then assigned that can be applied to each of the test runs. These offsets would give emission values that would not likely be exceeded over long time periods. Looking only at control devices used by sources in the top 12 percent, control device performance can also be examined to determine likely emission reductions for different devices operating on different units firing different fuels. The range in emission reductions could be used to set upper limits of expected control performance; then, these limits could be used, as above, to set emission limitations for each subcategory. Correlations between constituents of concern and other, perhaps more easily measured, constituents can be used to develop algorithms that incorporate variability.

The EPA found that there are two fundamentally different approaches to incorporating variability into the proposed rule: (1) including variability in the MACT floor calculation, or (2) including variability in the compliance method. Addressing variability in the MACT floor calculation requires that all of the origins of variability be assessed and quantified into factors that can be applied into the emission limitation calculations for each subcategory's floor. Each unit used for floor calculations is assumed to operate such that its measured emission rate is increased by the amount of variability found from statistical analysis, worst-case analysis, or control device performance analysis. Each unit in the top 12 percent of its subcategory would be adjusted to reflect the uncertainty associated with the various origins of variability, and the average emission rate for these units would be used as the floor emission limitation.

Addressing variability in the compliance method would involve allowing an averaging time for compliance that would accommodate variations in pollutant emissions over time. For example, averaging over a month or a year of data will provide opportunity for variations in the amount of a constituent in the fuel to be accommodated without exceeding the emission limitation. This method of addressing variability is not covered in this memorandum.

In trying to address the apparent sources of variability in the emissions test data, EPA tried to obtain data that reflected as many different plant configurations as would be found in the entire industry profile and conducted tests at units believed to be representative of those within

the source category. The tests and measurements, typically a three-run series of manual samples taken over one or two days of testing, are limited by the emission test method's accuracy and precision, by the short duration of the test, and by differences from one run to the next and one unit to the next. EPA has evaluated the total population of test results to determine a valid test method variability factor as well as a fuel variability factor. These factors were then applied in MACT floor emission limitation calculations, as appropriate.

In order to determine the MACT floor emission limits for existing units, EPA examined the population database of existing sources. Available Hg emissions test data were divided according to the following subcategories:

- bituminous coal
- subbituminous coal
- lignite coal
- waste coal
- IGCC units

The EPA examined the existing emission test data to determine the individual numerical average of the test results from the best-performing 12 percent (or equivalent) of each subcategory for each regulated HAP (or surrogate). The EPA then applied the potential uncertainty and variability in the emission test reports and Hg in fuel variability (as appropriate) to derive the MACT floor limits. The discussion below describes the development of the emission limitation for each regulated pollutant for coal-fired units for the bituminous, subbituminous, and lignite subcategories (there being insufficient data available for the waste coal and IGCC subcategories to conduct full statistical analyses).

The emission limit for Hg emissions from coal-fired units was determined by analyzing the available Hg emissions data in each of the three subcategories. The data were obtained from the ICR and included data for Hg emissions and Hg-in-coal data for calendar year 1999. The MACT floor calculations were based on the average performance of the top 12 percent of units in the individual subcategories.

The variability of Hg emissions from coal-fired units is significantly influenced by the variability over time in the composition of coal burned as fuel (i.e., differences in Hg content, chlorine (Cl) content, and heat content of coal). In particular, the Cl content of coal can be used as a key indicator of the type of Hg compound in flue gas. The effectiveness of control devices at removing Hg depends to a large extent on the type of Hg compound in the flue gas. Thus, which Hg compounds are present in the flue gas impacts the amount of Hg that will be captured by control devices and how much Hg will be released in stack emissions. Importantly, Cl content has a significant impact on which Hg compounds are contained in the flue gas. When combined with other relevant data, such as coal Hg content, the Cl content of coal can be used to predict Hg emissions.

The EPA examined a number of approaches to incorporating variability in the MACT floor determination, from a statistical analysis of the test data combined with an algebraic analysis of the coal data to full statistical analyses of both the test and coal data. A multi-variable analysis provided by WEST Associates (attached) appeared to provide the most comprehensive approach and has been adopted, with modifications as noted below, by the EPA in determining the MACT floor.

The data results from the multi-variable study performed lend support to the significance of coal Cl content to Hg controllability. The higher the Cl:Hg ratio, the more likely the formation of mercuric chloride (ionic or oxidized Hg) that is more readily captured by existing controls. This Cl:Hg ratio is independent of the coal rank as an indicator of Hg controllability. Figure 1 provides information on the range of Cl values for the various coal ranks, and subranks, used by the utility industry in the United States. As can be seen from the figure, the Cl contents overlap considerably and a bituminous coal is as likely to have low chlorine content as is a subbituminous or lignite coal.

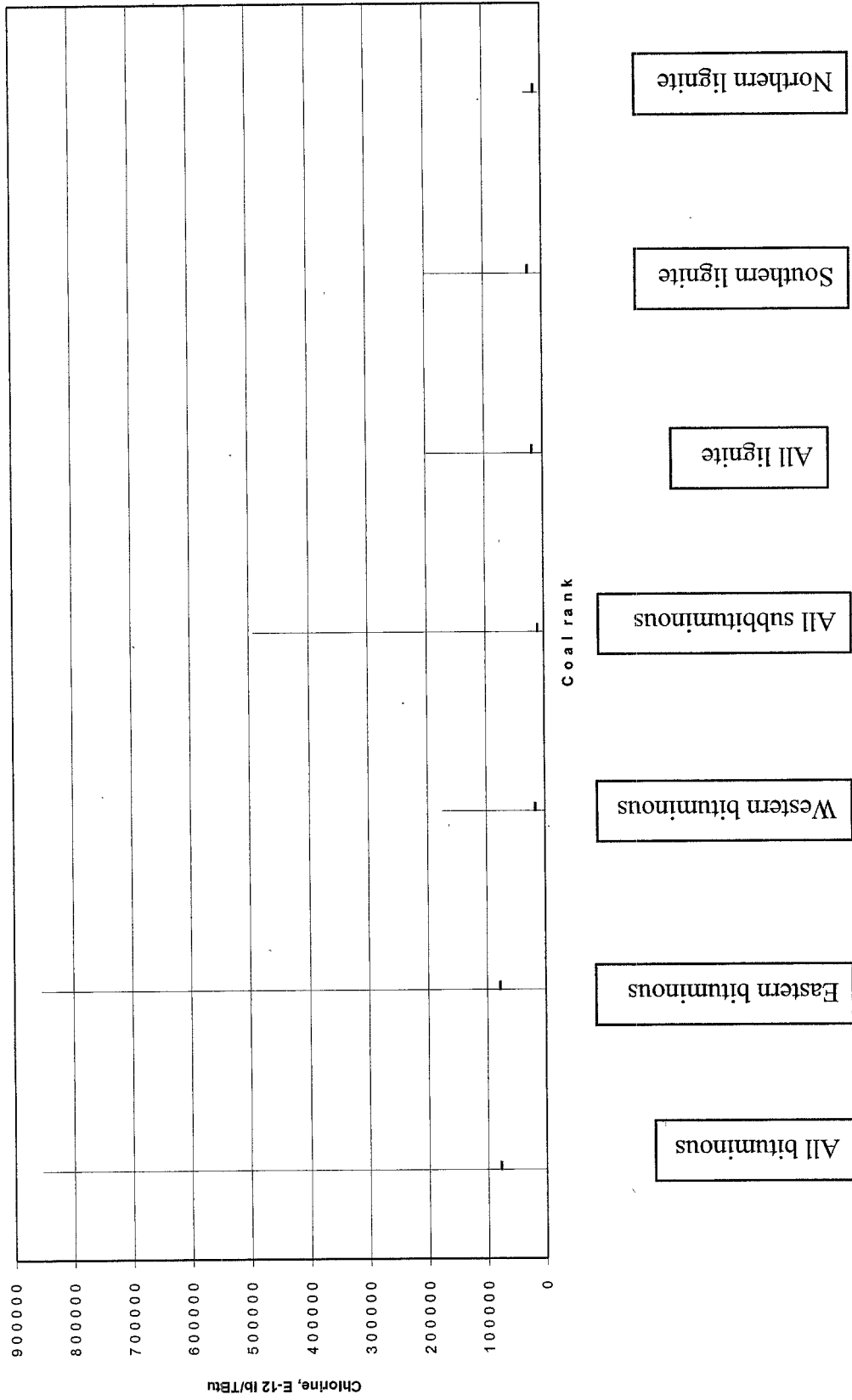
In sum, the coal Cl content is one of the primary determinants of which Hg-containing compounds will be present, and in what amounts, in the flue gas of an individual utility unit. The differing physical and chemical properties of Hg-containing compounds in the flue gas result in significant differences in the feasibility and effectiveness of controls for removing the compounds from flue gas. Accordingly, when combined with other relevant data, such as coal Hg content, the Cl content of coal can be used as a key indicator of Hg emissions.

The units in each of the three subcategories were sorted in ascending order of stack-tested Hg emission factor (measured in units of lb/TBtu, as adjusted by a method that normalizes Hg emissions to coal heat content [F-factor adjustment]). Accordingly, the top performing units of each subcategory were selected for further analysis.

The stack tests in the ICR database are insufficient to estimate the effect of fuel variability over time on the emissions of the best performing facilities. The ICR database contains extensive data on variation in coal composition recorded over the course of a year. To link fuel composition data to Hg emissions data, correlation equations were developed to represent the relationship between Hg removal fraction and Cl concentration for each of the control configurations used by the best performing units. The steps used to develop these correlation equations are set forth below.

The control configuration of each of the best performing units identified was identified. The Hg removal fraction and test coal Cl concentrations were obtained from the ICR database for each of the units in the database that have one of the identified control configurations. Finally, a correlation equation was derived for each identified control configuration by fitting the following mathematical expression to the Hg removal fractions and corresponding Cl concentrations obtained from the ICR stack test database.

Figure 1. Coal chlorine content



In the selection of the format of the correlation equation, care was taken that the mathematical expression accurately reflected the physical and chemical process by which Cl contributes to the controllability of stack Hg emissions. The correlation equation is based on the assumption that the rate of conversion of Hg to mercury chloride is proportional to the Cl concentration in the coal, irrespective of coal rank. With this expression, the maximum removal fraction is limited to 1, because the exponent term is always nonnegative, regardless of the Cl concentration. This corresponds to the real-world limitation that no more than 100 percent of the Hg in flue gas can be removed (i.e., there cannot be negative Hg emissions). As the coal Cl concentration drops to zero, the Hg removal fraction does not of necessity approach zero because some Hg removal may be achieved without reaction with Cl. The purpose of deriving a correlation equation for each control configuration used by the top performing units was to provide a numerical means of predicting the fraction of Hg removed for the best performing sources over the entire range of fuel variability experienced over the course of a year. Correlation equations were derived for each control configuration, but were only used to predict Hg removal if they were found to have acceptable explanatory power.

To determine whether the explanatory power of each correlation equation warranted its use on a larger range of ICR coal composition data, each correlation equation was validated against the ICR stack test data. For each of the test Cl concentrations in the ICR stack test database, the Hg removal fraction was calculated by use of the correlation equation with parameters selected to give the best fit to the data. A correlation coefficient was then calculated to evaluate the accuracy of the fit.

For each of the best performing units, unit-specific coal composition data for a one-year period were extracted from the ICR database to find the coal heat content, Hg content, and Cl content. For each set of coal composition data from the ICR database, the controlled Hg emissions were calculated by multiplying uncontrolled Hg emissions by  $(1 - \text{Hg removal fraction})$ . For each of the best-performing sources, this process was repeated for each set of measured coal composition values, yielding a range of Hg emission levels for that unit over time.

The test coal composition data from the ICR database (heat and Hg content) was used to calculate the uncontrolled Hg emission level. The Hg removal fraction was calculated in one of the following two ways:

(1) Where the correlation equation was found to have sufficient explanatory power, it was used to estimate the Hg removal fraction based on coal Cl composition data from the ICR data base. This approach accounted for variations in the Hg, Cl, and heat content of fuel.

(2) Where the correlation equation was a poor fit, the Hg removal fraction was based on the average Hg removal fraction observed in the ICR stack tests of that unit. This latter approach yielded a constant removal fraction based upon the source test, and had the effect of reducing the variability of predicted Hg emissions. Under this approach, the measured impact of fuel

variability was limited to the effect of variations in Hg and heat content, while variations in Cl concentration were not explicitly considered.

For each of the best performing units, the calculated Hg emissions, calculated in accordance with the procedures outlined above, were then sorted from smallest to largest to obtain a cumulative frequency distribution. The EPA chose to use the 97.5<sup>th</sup> percentile (as opposed to the 95<sup>th</sup> percentile used in the WEST analysis) value of this distribution (i.e., an emission rate that is expected to be exceeded only 2.5 percent of the time) to represent the operation of the unit under "worst conditions."

Because the ICR stack test facilities represent only a small portion of the true population of coal-fired utility units, it is necessary also to account for inter-unit variability between the top performers. The ICR database indicates that the population of coal-fired units exceeds 1,000. Yet, due to the size of the ICR database, the analysis of within-unit variability considered only the top units in each subcategory. (The EPA used the top four bituminous units, the top four subbituminous units, and the top five lignite units in its analysis. The EPA's interpretation of section 112 is that the statute is clear with regard to how many units should be used based on the number of units in the subcategory, regardless of the apparent inconsistencies as that number approaches 30. The WEST analysis used no fewer than five units per subcategory, regardless of the number of units in the subcategory.) Therefore, the actual number of the top 12 percent of coal-fired units in each subcategory is significantly larger than the number of units used in this analysis, particularly with respect to units burning bituminous and subbituminous coal. Under these circumstances, a focus on within-unit variability alone is not expected to capture the full range of emissions variability among the best performing sources. The EPA accounted for this variability by calculating a 97.5 percent upper confidence level (as opposed to the 95<sup>th</sup> percent upper confidence level used in the WEST analysis) for the mean by use of the t-statistic. This adjustment reflects the fact that the top performing sources in the data base do not represent the full population of the best performing 12 percent of coal-fired utility units.

Although fuel variability is a principal cause of emission variability, other factors also play a role in contributing to variability in Hg emissions. Analysis of fuel variability accounts for some, but not all of the variability in the stack testing of each unit that comprises the ICR database. Other drivers of variability in the test results, such as measurement error, are not included in the analysis. Intermittent maintenance events, which themselves can contribute to short-term increases in Hg emissions, also are not considered. In addition, the stack testing on which this assessment is based places artificial limitations on the variability of its results. Testing was performed with plants operating at full and constant load, and without on-going maintenance activities. Actual operation requires load-following in addition to intermittent maintenance activities. Insofar as the methodology discussed herein does not incorporate these effects, its results are likely to underestimate the reasonable worst-case emissions of the best performing facilities.

Conclusion

The MACT floor for existing units, based on the above analyses, is as follows:

Bituminous:	2.0 lb/TBtu
Subbituminous:	5.8 lb/TBtu
Lignite:	9.2 lb/TBtu

The MACT floor for new units is as follows:

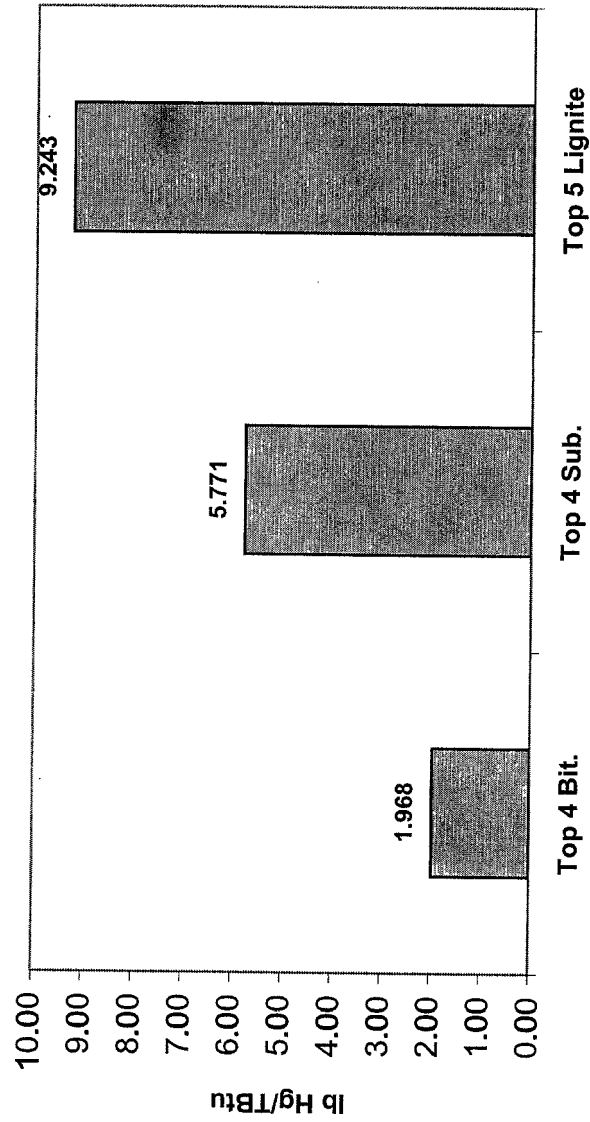
Bituminous:	0.61 lb/TBtu
Subbituminous:	2.0 lb/TBtu
Lignite:	6.3 lb/TBtu



Top 4 Bituminous	Top 4 Subbituminous	Top 5 Lignite	Top Waste	Top IGCC
Mecklenburg Cogeneration Dwayne Collier Battle Cogen Valmont Stockton	AES Hawaii, Inc. Clay Boswell Craig Cholla	R.M. Heskett Station Antelope Valley Station Leland Olds Station Stanton Station Stanton Station	Kline Township Cogen Facility Scrubgrass Generating	Wabash River Generating Station Polk Power
GEN 1 2B 5 1	A 2 C3 3	B2 B1 2 10 1	GEN1 GEN1	1 + 1A 1

Scenario	Hg MACT FLOOR (lb/TBtu)
Top 4 Bit.	1.9679
Top 4 Sub.	5.7707
Top 5 Lignite	9.2432

Hg MACT Floor Levels



MACT Analysis for Top 5 Lignite Units - 97.5th Percentile Values

Plant	Unit	Particulate Control	SO2 Control	Measured Fraction Hg Removal	Correlation Used? (Y/N)	"Alpha"	"Beta"	Measured lb/TBtu	97.5th Percentile, lb/TBtu
R.M. Heskett Station	B2	ESP- CS	FBC	0.4036	N	0.0000	0.5964	3.97680	7.798467
Antelope Valley Station	B1	BAGHOUSE	SDA	0.3333	Y	0.0022	0.8188	4.00420	7.087007
Leland Olds Station	2	ESP- CS	NONE	0.0487	N	0.0000	0.9513	4.02330	9.532343
Stanton Station	10	BAGHOUSE	SDA	0.0147	Y	0.0022	0.8188	6.25170	8.028945
Stanton Station	1	ESP- CS	NONE	0.4409	N	0.0000	0.5591	6.90240	6.305639
<b>Mean</b>								5.031680	7.750480
<b>Standard Deviation</b>								1.429454	1.202356
<b>UCL97.5 of the Mean</b>								6.806297	9.243163

MACT Analysis for Top 4 Subbituminous Units - 97.5th Percentile Values

Plant	Unit	Particulate Control	SO2 Control	Measured Fraction Hg Removal	Correlation Used? (Y/N)	"Alpha"	"Beta"	Measured lb/TBtu	97.5th Percentile, lb/TBtu
AES Hawaii, Inc.	A	BAGHOUSE	FBC	0.5252	N	0.0000	0.4748	0.46060	2.134924
Clay Boswell	2	BAGHOUSE	COMP COAL	0.8257	N	0.0000	0.1743	0.66330	1.991214
Craig	C3	BAGHOUSE	SDA	0.336	N	0.0000	0.6640	0.72480	2.635140
Cholla	3	ESP- HS	NONE	0.642	N	0.0000	0.3580	1.20660	5.583025
								0.763825	3.086076
								0.316029	1.687356
								1.266627	5.770659

Mean

Standard Deviation

UCL97.5 of the Mean

MACT Analysis for Top 4 Bituminous Units - 97.5th Percentile Values

Plant	Unit	Particulate Control	SO2 Control	Measured Fraction Hg Removal	Correlation Used? (Y/N)	"Alpha"	"Beta"	Measured lb/Tbtu	97.5th Percentile, lb/Tbtu
Mecklenburg Cogeneration Facility	GEN 1	BAGHOUSE	SDA	0.9881	Y	0.0022	0.8188	0.10620	1.805065
Dwayne Collier Battle Cogeneration Facility	2B	BAGHOUSE	SDA	0.9366	Y	0.0022	0.8188	0.10740	1.237554
Valmont	5	BAGHOUSE	COMP COAL	0.8652	N	0.0000	0.1348	0.12680	0.694385
Stockton	1	BAGHOUSE	FBC/SNCR	0.9182	Y	0.0069	0.3186	0.13160	0.609453
								0.118000	1.086614
								0.013089	0.553919
								0.138825	1.967900

Mean  
Standard Deviation  
UCL97.5 of the Mean

MACT Analysis for Top Waste Coal Units - 97.5th Percentile

Plant	Unit	Particulate Control	SO2 Control	Measured Fraction Hg Removal	Correlation Used? (Y/N)	"Alpha"	"Beta"	Measured lb Hg/Tbtu	97.5th Percentile lb Hg/TBtu	
Kline Township Cogen Facility Scrubgrass Generating Company L. P.	GEN1 BAGHOUSE	FBC	FBC	0.9975	N	0.0000	0.0025	0.08160	0.118229	
	GEN1 BAGHOUSE	FBC	FBC	0.9989	N	0.0000	0.0110	0.09360	0.157153	
<b>Mean</b>									0.087600	0.137691
<b>Standard Deviation</b>									0.008485	0.027524
<b>UCL97.5 of the Mean</b>									0.163836	<b>0.384979</b>

MACT Analysis for Top IGCC Units - 97.5th Percentile

Plant	Unit	Particulate Control	SO <sub>2</sub> Control	Measured Fraction Hg Removal	Correlation Used? (Y/N)	"Alpha"	"Beta"	Measured lb/Tbtu	97.5th Percentile lb/TBtu
Wabash River Generating Station Polk Power	1 + 1A	COAL GAS	COAL GAS	0.3253	N	0	0.6747	5.3343	7.3350
	1	COAL GAS	COAL GAS	0.3399	N	0	0.6601	5.4713	5.3920
<p><b>Mean</b></p> <p><b>Standard Deviation</b></p> <p><b>UCL97.5 of the Mean</b></p>									
								5.402800	6.363500
								0.096874	1.373972
								6.273161	<b>18.707950</b>

Summary

**MACT Analysis for Top 4 Bituminous Units - 97.5th Percentile Values**

Plant	Unit	Particulate control	SO <sub>2</sub> Control	Measured fraction Hg removal	Correlation used? (Y/N)	"Alpha"	"Beta"	Measured lb/TBtu	97.5th Percentile, lb/TBtu
Mecklenburg Cogeneration Facility	GEN 1	BAGHOUSE	SDA	0.9881	Y	0.0022	0.8188	0.10620	1.805065
Dwayne Collier Battle Cogeneration Facility	2B	BAGHOUSE	SDA	0.9366	Y	0.0022	0.8188	0.10740	1.237554
Valmont	5	BAGHOUSE	COMP COAL	0.8652	N	0.0000	0.1348	0.12680	0.694385
Stockton	1	BAGHOUSE	FBC/SNCR	0.9182	Y	0.0069	0.3186	0.13160	0.609453
<b>Mean</b>								0.118000	1.086614
<b>Standard Deviation</b>								0.013089	0.553919
<b>UCL97.5 of the Mean</b>								0.138825	1.967900

**MACT Analysis for Top 4 Subbituminous Units - 97.5th Percentile Values**

Plant	Unit	Particulate control	SO <sub>2</sub> Control	Measured fraction Hg removal	Correlation used? (Y/N)	"Alpha"	"Beta"	Measured lb/TBtu	97.5th Percentile, lb/TBtu
AES Hawaii, Inc.	A	BAGHOUSE	FBC	0.5252	N	0	0.4748	0.46060	2.134924
Clay Boswell	2	BAGHOUSE	COMP COAL	0.8257	N	0	0.1743	0.66330	1.991214
Craig	C3	BAGHOUSE	SDA	0.336	N	0	0.6640	0.72480	2.635140
Cholla	3	ESP- HS	NONE	0.642	N	0	0.3580	1.20660	5.583025
<b>Mean</b>								0.763825	3.086076
<b>Standard Deviation</b>								0.316029	1.687356
<b>UCL97.5 of the Mean</b>								1.266627	5.770659

**MACT Analysis for Top 5 Lignite Units - 97.5th Percentile Values**

Plant	Unit	Particulate control	SO <sub>2</sub> Control	Measured fraction Hg removal	Correlation used? (Y/N)	"Alpha"	"Beta"	Measured lb/TBtu	97.5th Percentile, lb/TBtu
R.M. Heskett Station	B2	ESP- CS	FBC	0.4036	N	0	0.5964	3.97680	7.798467
Antelope Valley Station	B1	BAGHOUSE	SDA	0.3333	Y	0.0022	0.8188	4.00420	7.087007
Leland Olds Station	2	ESP- CS	NONE	0.0487	N	0	0.9513	4.02330	9.532343
Stanton Station	10	BAGHOUSE	SDA	0.0147	Y	0.0022	0.8188	6.25170	8.028945
Stanton Station	1	ESP- CS	NONE	0.4409	N	0	0.5591	6.90240	6.305639
<b>Mean</b>								5.031680	7.750480
<b>Standard Deviation</b>								1.429454	1.202356
<b>UCL97.5 of the Mean</b>								6.806297	9.243163

**MACT Analysis for Top Waste Coal Units - 97.5th Percentile**

Plant	Unit	Particulate control	SO <sub>2</sub> Control	Measured fraction Hg removal	Correlation used? (Y/N)	"Alpha"	"Beta"	Measured lb/TBtu	97.5th Percentile, lb/TBtu
Kline Township Cogen Facility	GEN1	BAGHOUSE	FBC	0.9975	N	0	0.0025	0.08160	0.118229
Scrubgrass Generating Company L. P.	GEN1	BAGHOUSE	FBC	0.9989	N	0	0.0110	0.09360	0.157153
<b>Mean</b>								0.087600	0.137691
<b>Standard Deviation</b>								0.008485	0.027524
<b>UCL97.5 of the Mean</b>								0.163836	0.384979

**MACT Analysis for Top IGCC Units - 97.5th Percentile**

Plant	Unit	Particulate control	SO <sub>2</sub> Control	Measured fraction Hg removal	Correlation used? (Y/N)	"Alpha"	"Beta"	Measured lb/TBtu	97.5th Percentile, lb/TBtu
Wabash River Generating Station	1 + 1A	COAL GAS	COAL GAS	0.3253	N	0	0.6747	5.3343	7.3350
Polk Power	1	COAL GAS	COAL GAS	0.3399	N	0	0.6601	5.4713	5.3920
<b>Mean</b>								5.402800	6.363500
<b>Standard Deviation</b>								0.096874	1.373972
<b>UCL97.5 of the Mean</b>								6.273161	18.707950



**Mecklenburg 1**

ALPHA

BETA

0.002164007 0.818815299

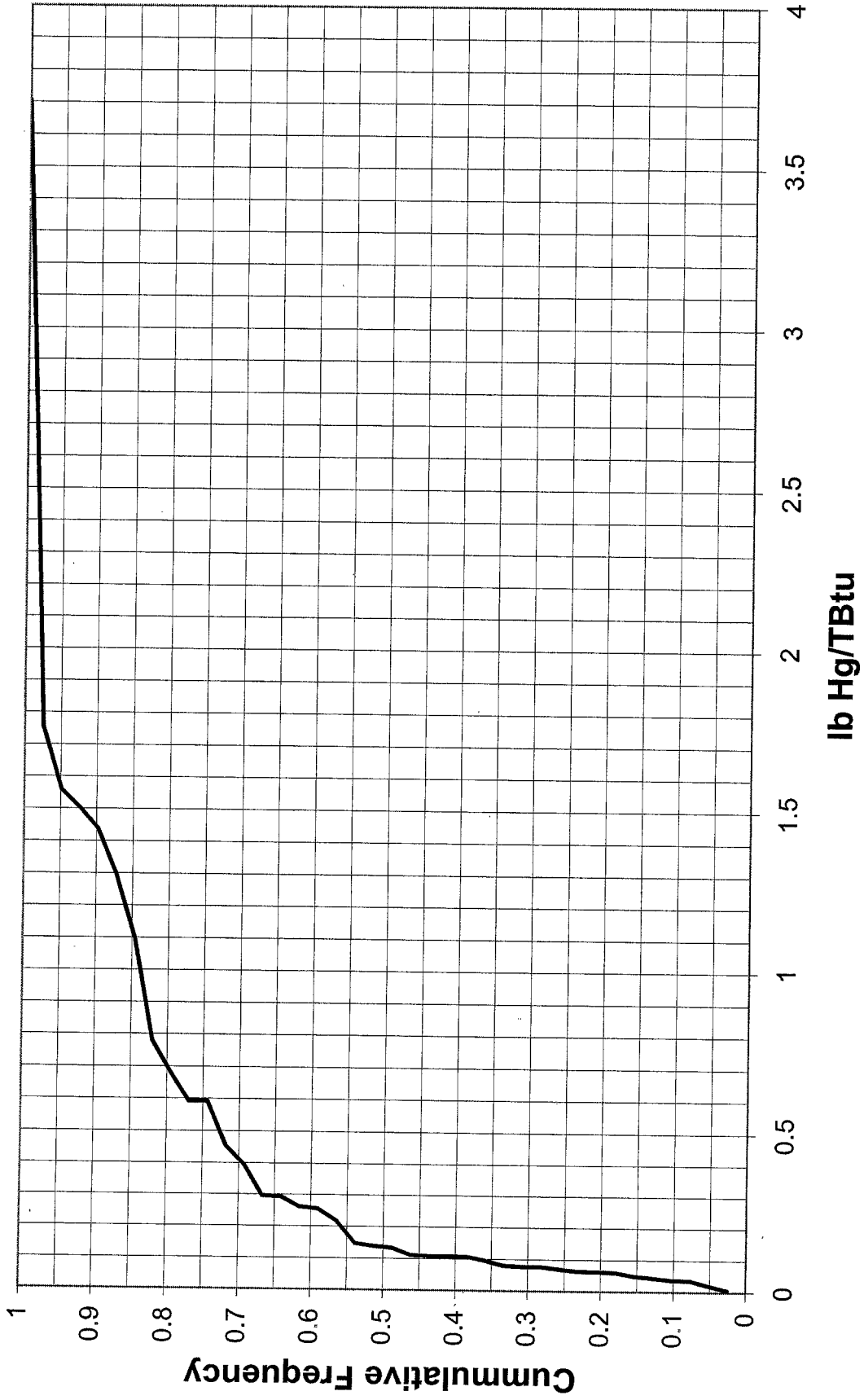
H (lb/Btu)	Hg(ppm)	C(ppm)	lb Hg/TBtu	Cummulative Frequency	Index	Sorted lb Hg/TBtu
13075	0.2	1000	1.438659268	0.025641026	1	0.006793718
13081	0.18	1000	1.294199445	0.051282051	2	0.021009003
13480	0.07	1300	0.255171936	0.076923077	3	0.036453554
13480	0.05	1400	0.146799049	0.102564103	4	0.03739263
13489	0.1	1400	0.293402206	0.128205128	5	0.044094229
13489	0.07	1700	0.107304152	0.153846154	6	0.049798851
13433	0.1	2000	0.080423012	0.179487179	7	0.059756221
13433	0.05	2300	0.021009003	0.205128205	8	0.062485107
13432	0.09	1700	0.138547938	0.230769231	9	0.062991755
13607	0.09	2300	0.03739263	0.256410256	10	0.069558599
13607	0.06	2900	0.006793718	0.282051282	11	0.076765333
13457	0.07	1700	0.107559315	0.307692308	12	0.076872439
13457	0.07	2200	0.036453554	0.333333333	13	0.080423012
12896	0.09	600	1.558852934	0.358874359	14	0.095677847
12898	0.09	200	3.706319253	0.384615385	15	0.107304152
13098	0.08	700	1.099510903	0.41025641	16	0.107559315
13098	0.09	538	1.756314566	0.435897436	17	0.107893267
13570	0.14	1100	0.781513002	0.461538462	18	0.110883352
13892	0.06	1600	0.110883352	0.487179487	19	0.132570334
13892	0.09	1800	0.107893267	0.512820513	20	0.138547938
13866	0.09	1200	0.396002296	0.538461538	21	0.146799049
13925	0.1	2100	0.062485107	0.564102564	22	0.216868661
13925	0.08	1800	0.095677847	0.58974359	23	0.255171936
13813	0.1	2100	0.062991755	0.615384615	24	0.261695109
13813	0.07	2100	0.044094229	0.641025641	25	0.293402206
13978	0.09	2000	0.069558599	0.666666667	26	0.295836624
13959	0.08	1900	0.076872439	0.692307692	27	0.396002296
13373	0.09	600	1.504214719	0.717948718	28	0.454924335
13611	0.09	1400	0.261695109	0.743589744	29	0.592027915
13711	0.08	900	0.681352942	0.769230769	30	0.59216015
13556	0.07	1600	0.132570334	0.794871795	31	0.681352942
13595	0.06	1300	0.216868661	0.820512821	32	0.781513002
13313	0.19	1500	0.454924335	0.846153846	33	1.099510903
13397	0.13	1200	0.592027915	0.871794872	34	1.294199445
13468	0.06	1900	0.059756221	0.897435897	35	1.438659268
13468	0.05	1700	0.076765333	0.923076923	36	1.504214719
13468	0.05	1900	0.049796851	0.948717949	37	1.559852934
13367	0.2	1400	0.59216015	0.974358974	38	1.756314566
13378	0.1	1400	0.295836624	0.974358974	39	3.706319253

1.756314566 38 0.974359  
3.706319253 39 1

**97.5th Percentile 1.8050647**

Graph Title Mecklenburg 1: 97.5th Percentile = 1.8051 lb Hg/TBtu

**Mecklenburg 1: 97.5th Percentile = 1.8051 lb Hg/TBtu**



**Dwayne Collier 2B**

**ALPHA**  
0.002164007 0.818815299

**BETA**

Hg(ppm)

H (lb/Btu)

Cumulative Frequency

Index

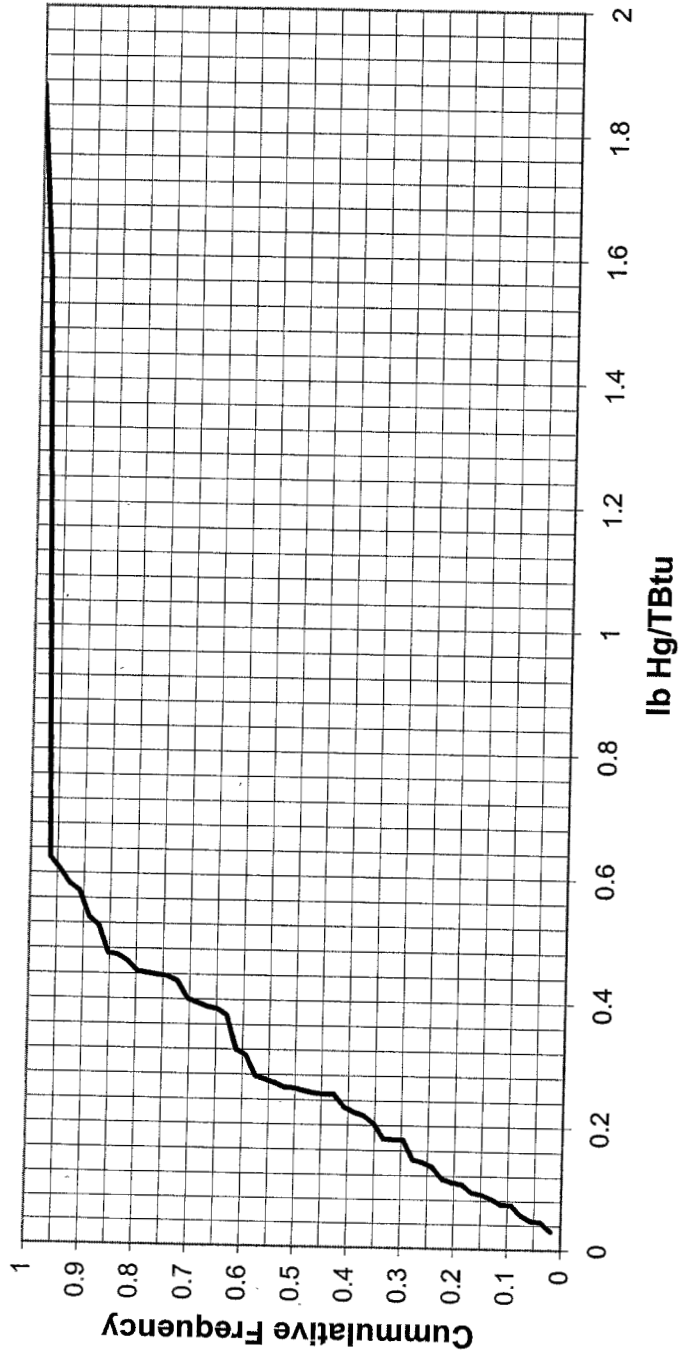
Sorted lb Hg/TBtu

0.625803686 52 0.962963  
1.56695856 53 0.981481  
**97.5th Percentile 1.2375544**

Graph Title **Dwayne Collier 2B: 97.5th Percentile = 1.2376 lb Hg/TBtu**

H (lb/Btu)	Hg(ppm)	C (ppm)	lb Hg/TBtu	Cumulative Frequency	Index	Sorted lb Hg/TBtu
13792	0.03	1300	0.106885493	0.018518519	1	0.03106187
14072	0.04	1600	0.072976669	0.037037037	2	0.046056089
13710	0.06	1200	0.267005487	0.055555556	3	0.047568195
13738	0.07	1200	0.310871507	0.074074074	4	0.056135351
13699	0.04	1100	0.221186769	0.092592593	5	0.072976669
13946	0.07	1000	0.472082638	0.111111111	6	0.073832429
13767	0.17	2400	0.056135351	0.12962963	7	0.082890697
14099	0.05	1900	0.047568195	0.148148148	8	0.090479222
13786	0.12	700	1.56695856	0.166666667	9	0.093745681
13736	0.16	1300	0.572380013	0.185185185	10	0.106885493
13731	0.08	1100	0.44134259	0.203703704	11	0.110023354
13780	0.11	1500	0.254451472	0.222222222	12	0.116617809
14074	0.06	2000	0.046056089	0.240740741	13	0.13393001
13815	0.08	1100	0.438659074	0.259259259	14	0.141883644
13785	0.05	1500	0.115617809	0.277777778	15	0.145886639
13693	0.05	1600	0.093745681	0.296296296	16	0.177237007
13398	0.06	1400	0.177237007	0.314814815	17	0.177550311
13770	0.07	1300	0.249797944	0.333333333	18	0.179140596
13638	0.05	1300	0.177550311	0.351851852	19	0.203361349
13819	0.08	1400	0.229116571	0.37037037	20	0.215492323
13687	0.11	1300	0.394920045	0.388888889	21	0.221186769
14235	0.08	1500	0.179140596	0.407407407	22	0.229116571
13726	0.11	1100	0.607067119	0.425925926	23	0.249489932
13475	0.04	1300	0.145866639	0.444444444	24	0.249797944
13767	0.1	1200	0.443166657	0.462962963	25	0.250982684
13886	0.13	1300	0.460035081	0.481481481	26	0.254451472
13734	0.13	1400	0.374618689	0.5	27	0.258728725
14202	0.08	1000	0.529797773	0.518518519	28	0.259957096
13724	0.22	800	1.871945718	0.537037037	29	0.267005487
14033	0.05	800	0.516697605	0.555555556	30	0.272113438
13702	0.09	1400	0.259957096	0.574074074	31	0.277944298
13767	0.07	1300	0.249489932	0.592592593	32	0.310871507
14063	0.1	1834	0.110023354	0.611111111	33	0.320261726
13762	0.07	1100	0.385304877	0.62962963	34	0.320261726
14092	0.04	1500	0.090479222	0.648148148	35	0.374618689
14022	0.07	1000	0.469523925	0.666666667	36	0.385304877
14006	0.05	2100	0.03106187	0.685185185	37	0.388588832
13969	0.1	1200	0.438758205	0.703703704	38	0.401647045
14061	0.04	1100	0.215492323	0.722222222	39	0.429226558
13627	0.05	1100	0.277944298	0.740740741	40	0.436758205
14003	0.05	1700	0.073932429	0.759259259	41	0.436758205
14007	0.07	900	0.583585094	0.777777778	42	0.44134259
13623	0.07	1400	0.203361349	0.796296296	43	0.443166657
13901	0.06	800	0.625803686	0.814814815	44	0.460035081
14064	0.07	1800	0.082890697	0.833333333	45	0.469523925
13705	0.07	1300	0.250982684	0.851851852	46	0.472082638
13910	0.11	1300	0.388588832	0.87037037	47	0.472082638
14060	0.06	1000	0.401647045	0.888888889	48	0.529797773
13947	0.05	1400	0.141883644	0.907407407	49	0.572380013
13809	0.09	1300	0.320261726	0.925925926	50	0.583585094
13919	0.05	1100	0.272113438	0.944444444	51	0.607067119
13603	0.05	900	0.429226558	0.962962963	52	0.625803686
13767	0.09	1400	0.258728725	0.981481481	53	1.56695856
14045	0.02	1000	0.13393001	1	54	1.871945718

Dwayne Collier 2B: 97.5th Percentile = 1.2376 lb Hg/TBtu



**Valmont 5**  
**ALPHA**

**BETA**  
0.1348

H (lb/Btu)	Hg(ppm)	Cl(ppm)	lb Hg/TBtu	Cummulative Frequency	Index	Sorted lb Hg/TBtu
12376	0.058	447	0.631738849	0.052631579	1	0.129005503
12539	0.012	491	0.129005503	0.105266158	2	0.191962025
12484	0.051	449	0.550688882	0.157894737	3	0.215559287
12555	0.053	476	0.569048188	0.210526316	4	0.289500477
12572	0.027	712	0.289500477	0.263157895	5	0.300892857
12502	0.03	501	0.323468245	0.315789474	6	0.308077863
12544	0.028	565	0.300892857	0.368421053	7	0.323468245
12526	0.063	423	0.677981798	0.421052632	8	0.36694956
12423	0.038	516	0.412331965	0.473684211	9	0.372405083
12669	0.035	435	0.372405083	0.526315789	10	0.3738641
12676	0.064	662	0.680593247	0.578947368	11	0.401159057
12777	0.067	610	0.706863896	0.631578947	12	0.412331965
12689	0.029	1008	0.308077863	0.684210526	13	0.417901431
12640	0.018	821	0.191962025	0.736842105	14	0.550688882
12259	0.034	812	0.3738641	0.789473684	15	0.569048188
12490	0.034	696	0.36694956	0.842105263	16	0.631738849
12507	0.02	545	0.215559287	0.894736842	17	0.677981798
12580	0.039	560	0.417901431	0.947368421	18	0.680593247
12769	0.038	613	0.401159057	1	19	0.706863896

**97.5th Percentile 0.6943853**

**Graph Title** Valmont 5: 97.5th Percentile = 0.6944 lb Hg/TBtu

0.680593247 18 0.947368  
0.706863896 19 1

**Valmont 5: 97.5th Percentile = 0.6944 lb Hg/TBtu**



**Stockton Cogen 1**

ALPHA  
0.006860787 0.318572089

BETA

H (lb/Btu)	Hg(ppm)	Cl(ppm)	lb Hg/TBtu	Cummulative Frequency	Index	Sorted lb Hg/TBtu
12323	0.046	460	0.050656154	0.025	1	0.005123539
12323	0.014	462	0.015206988	0.05	2	0.008590202
11678	0.052	222	0.309293623	0.075	3	0.00961387
11678	0.007	222	0.04163568	0.1	4	0.00996762
12408	0.04	152	0.361964881	0.125	5	0.01165474
12408	0.008	538	0.005123539	0.15	6	0.012109333
12408	0.008	441	0.00996762	0.175	7	0.012450574
12403	0.012	240	0.059396077	0.2	8	0.015206988
12403	0.014	400	0.023118957	0.225	9	0.019066297
12632	0.039	199	0.251107352	0.25	10	0.02235476
12632	0.029	188	0.201357792	0.275	11	0.023118957
11741	0.095	373	0.199450311	0.3	12	0.034723562
12847	0.052	510	0.038977354	0.325	13	0.037161161
11677	0.046	484	0.045342654	0.35	14	0.038977354
12161	0.026	498	0.02235476	0.375	15	0.04163568
12219	0.02	554	0.01165474	0.4	16	0.041998519
12534	0.026	633	0.008590202	0.425	17	0.045342654
12562	0.065	263	0.27128575	0.45	18	0.050358918
12074	0.052	526	0.037161161	0.475	19	0.050656154
11751	0.043	425	0.06313505	0.5	20	0.059396077
11573	0.076	175	0.629716429	0.525	21	0.06313505
11546	0.063	164	0.564237572	0.55	22	0.065118084
12768	0.066	229	0.342215709	0.575	23	0.06654472
13063	0.117	225	0.609453005	0.6	24	0.071412124
12736	0.053	167	0.421557693	0.625	25	0.089679938
12970	0.03	240	0.141998755	0.65	26	0.129191964
12988	0.019	187	0.041998519	0.675	27	0.141998755
11566	0.042	194	0.129191364	0.7	28	0.199450311
11327	0.023	288	0.089679938	0.725	29	0.201357792
12257	0.039	200	0.257020496	0.75	30	0.251107352
12481	0.017	263	0.071412124	0.775	31	0.257020496
12382	0.011	211	0.06654472	0.8	32	0.27128575
12935	0.026	612	0.00961387	0.825	33	0.30565468
12429	0.021	549	0.012450574	0.85	34	0.309293623
11790	0.03	405	0.050358918	0.875	35	0.342215709
11997	0.03	365	0.065118084	0.9	36	0.361964881
10568	0.076	698	0.019066297	0.925	37	0.421557693
11339	0.09	625	0.034723562	0.95	38	0.564237572
12396	0.036	632	0.012109333	0.975	39	0.609453005
		632	0.012109333	1	40	0.629716429

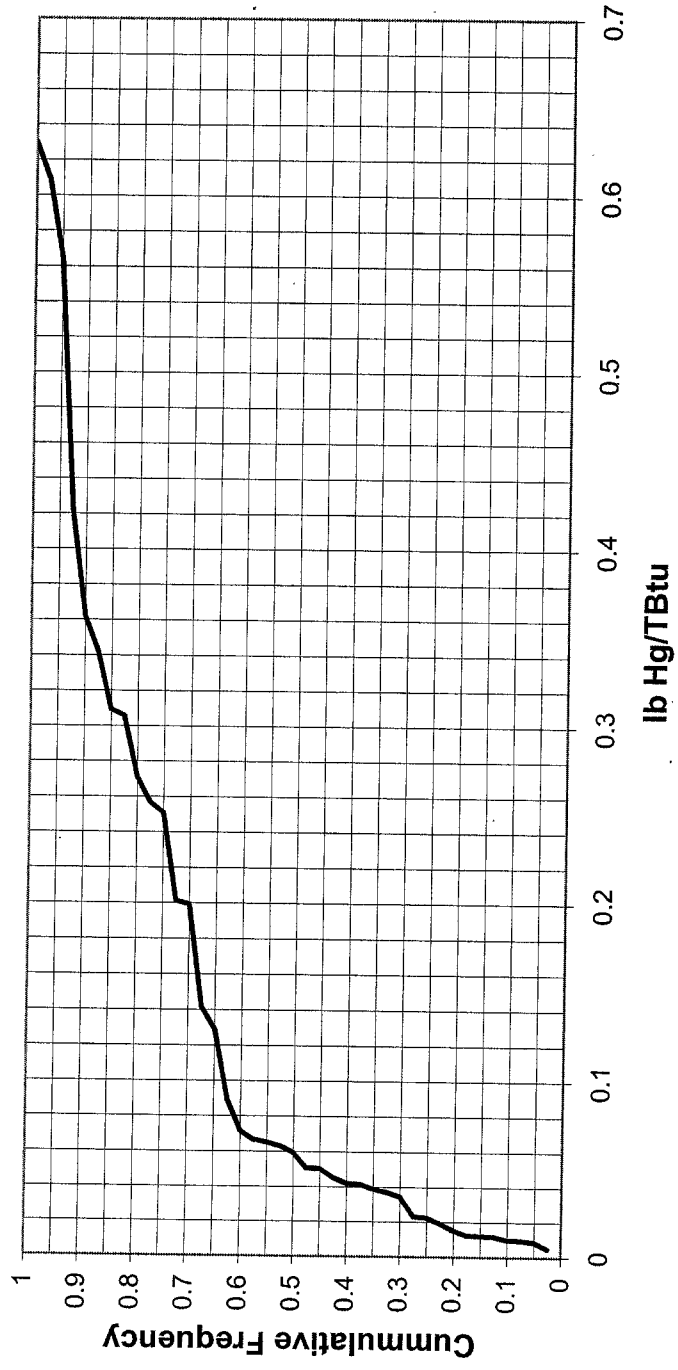
0.609453005 39 0.975  
0.629716429 40 1

**97.5th Percentile 0.609453**

Graph Title

Stockton Cogen 1: 97.5th Percentile = 0.6095 lb Hg/TBtu

Stockton Cogen 1: 97.5th Percentile = 0.6095 lb Hg/TBtu





AES Hawaii A  
ALPHA

BETA  
0.4748

H (lb/Btu)	Hg(ppm)	Ci(ppm)	lb Hg/TBtu	Cummulative Frequency	Index	Sorted lb Hg/TBtu
11110	0.05	100	2.136813681	0.023809524	1	0.732433475
11310	0.05	100	2.099027409	0.047619048	2	0.735155222
10840	0.05	100	2.1900369	0.071428571	3	0.737209844
12431	0.02	0	0.76369671	0.095238095	4	0.73847111
12133	0.03	0	1.173988296	0.119047619	5	0.73904584
12859	0.02	0	0.73847111	0.142857143	6	0.740371121
12511	0.03	0	1.138518104	0.166666667	7	0.744375637
12566	0.02	0	0.755689957	0.19047619	8	0.747893203
12345	0.03	50	1.153827461	0.214285714	9	0.752039281
12425	0.03	50	1.14639839	0.238095238	10	0.755689957
12362	0.02	60	0.768160492	0.261904762	11	0.759558471
12471	0.02	50	0.761446556	0.285714286	12	0.759923175
12263	0.03	50	1.161542852	0.30952381	13	0.761446556
12527	0.03	50	1.137063942	0.333333333	14	0.76389671
12051	0.03	50	1.181976599	0.357142857	15	0.768160492
12965	0.02	50	0.732433475	0.380952381	16	0.774740964
12825	0.03	50	1.110643275	0.404761905	17	1.082617618
13157	0.03	50	1.082617618	0.428571429	18	1.110643275
12697	0.02	101	0.747893203	0.452380952	19	1.117088856
12751	0.03	68	1.117088856	0.476190476	20	1.120251671
12684	0.03	57	1.12289593	0.5	21	1.12289593
12826	0.02	111	0.740371121	0.523809524	22	1.1259189
12269	0.03	61	1.160974815	0.547619048	23	1.128058921
12849	0.02	50	0.73904584	0.571428571	24	1.132723658
12257	0.02	62	0.774740964	0.595238095	25	1.133534936
12715	0.03	50	1.120251671	0.619047619	26	1.135704034
12575	0.03	70	1.132723658	0.642857143	27	1.137063942
12422	0.03	97	1.146675254	0.666666667	28	1.138518104
12292	0.04	159	1.545069964	0.69047619	29	1.14639839
12627	0.03	53	1.128058921	0.714285714	30	1.146490663
12917	0.02	50	0.735155222	0.738095238	31	1.146675254
12330	0.03	58	1.155231144	0.761904762	32	1.151681759
12651	0.03	50	1.1259189	0.785714286	33	1.153827461
12566	0.03	67	1.133534936	0.80952381	34	1.155231144
12881	0.02	52	0.737209844	0.833333333	35	1.160974815
12757	0.02	50	0.744375637	0.857142857	36	1.161542852
12496	0.02	103	0.759923175	0.880952381	37	1.173988296
12627	0.02	75	0.752039281	0.904761905	38	1.181976599
12542	0.03	81	1.135704034	0.928571429	39	1.545069964
12502	0.02	71	0.759558471	0.952380952	40	2.099027409
12368	0.03	57	1.151681759	0.976190476	41	2.136813681
12424	0.03	65	1.146490663		42	2.1900369

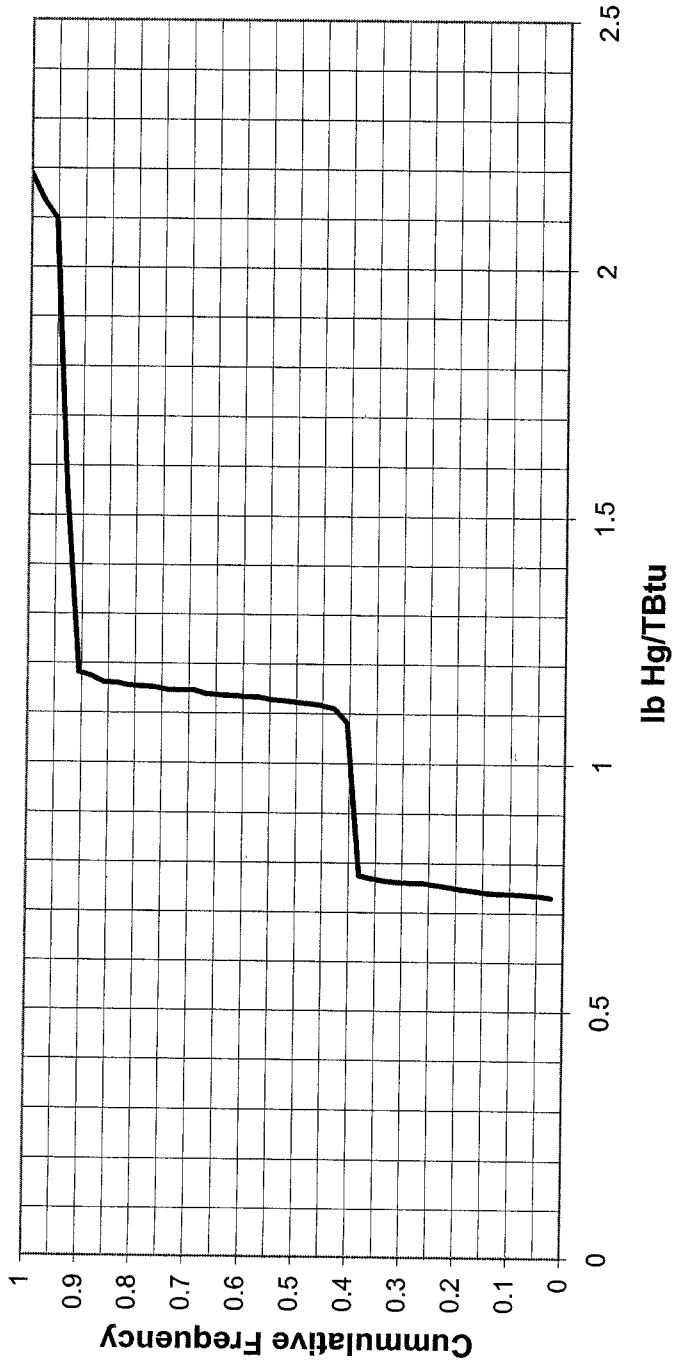
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2.136813681

40 0.952381  
41 0.97619

**97.5th Percentile 2.1349244**

Graph Title AES Hawaii A: 97.5th Percentile = 2.1349 lb Hg/TBtu

**AES Hawaii A: 97.5th Percentile = 2.1349 lb Hg/TBtu**



Clay Boswell 2  
ALPHA

BETA  
0 0.1743

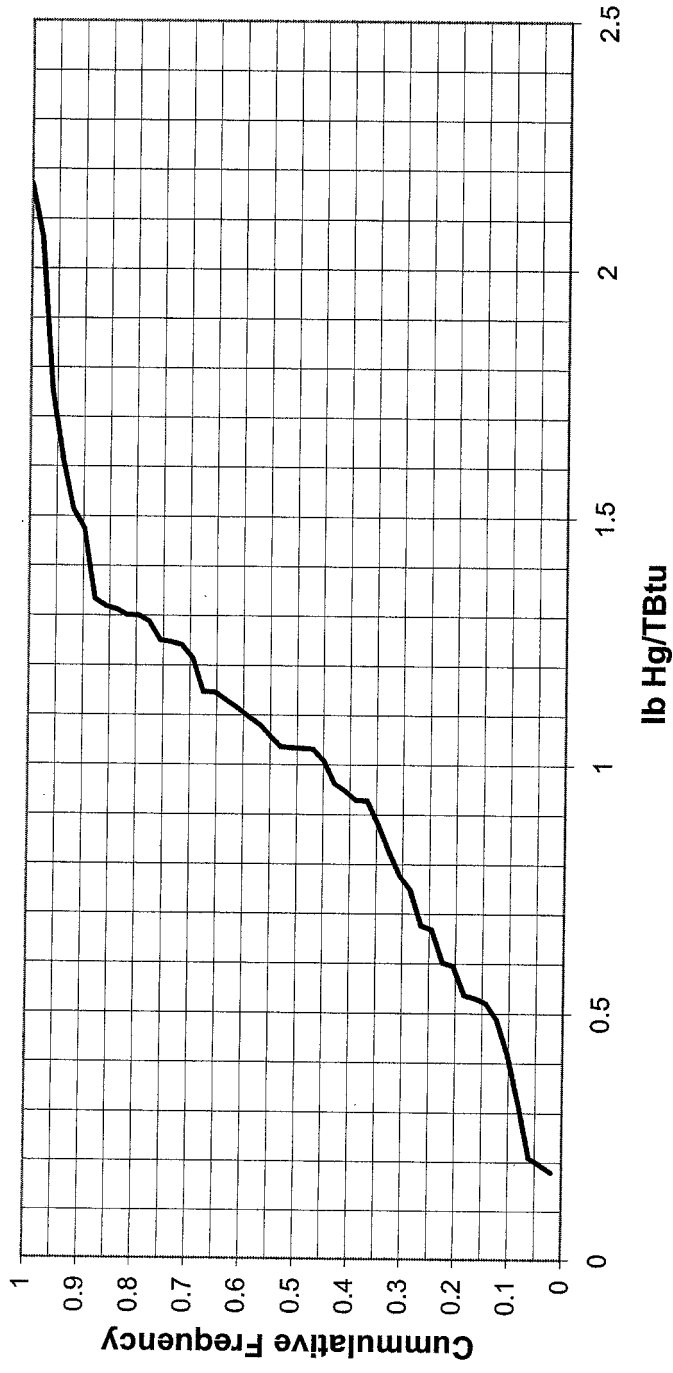
H (lb/Btu)	Hg(ppm)	Ci(ppm)	lb Hg/TBtu	Cummulative Frequency	Index	Sorted lb Hg/TBtu
12464	0.035	50	0.489449615	0.020408163	1	0.180492273
12371	0.154	50	2.169768006	0.040816327	2	0.195984258
12416	0.095	50	1.333642075	0.06122449	3	0.208575987
11811	0.07	50	1.033020066	0.081632653	4	0.320327607
12005	0.078	50	1.132478134	0.102040816	5	0.418386942
12466	0.038	50	0.531317183	0.12244898	6	0.489449615
11820	0.063	50	0.929010152	0.142857143	7	0.520970999
11760	0.073	100	1.081964286	0.163265306	8	0.531317183
12539	0.056	100	0.778435282	0.183673469	9	0.536872822
11643	0.062	100	0.928162845	0.204081633	10	0.595219124
12554	0.013	100	0.180492273	0.224489796	11	0.601903309
11929	0.069	100	1.008190125	0.244897959	12	0.668033923
12479	0.094	100	1.312941742	0.265306122	13	0.676783692
11939	0.071	100	1.036544099	0.285714286	14	0.749403748
12342	0.086	100	1.214535732	0.306122449	15	0.778435282
11932	0.101	100	1.475385518	0.326530612	16	0.826796913
12515	0.068	100	0.947055533	0.346938776	17	0.880805282
12504	0.074	100	1.031525912	0.367346939	18	0.928162845
11838	0.072	100	1.060111505	0.387755102	19	0.929010152
11879	0.085	50	1.247200943	0.408163265	20	0.947055533
12263	0.047	50	0.668033923	0.428571429	21	0.962656131
11864	0.076	50	1.116554282	0.448979592	22	1.008190125
12270	0.088	50	1.25007335	0.469387755	23	1.031525912
11769	0.065	50	0.962656131	0.489795918	24	1.033020066
12438	0.059	50	0.826796913	0.510204082	25	1.034379319
12451	0.014	50	0.195984258	0.530612245	26	1.036544099
11936	0.085	50	1.241244973	0.551020408	27	1.060111505
12337	0.038	50	0.536872822	0.571428571	28	1.081964286
12301	0.073	50	1.034379319	0.591836735	29	1.099823322
12362	0.048	50	0.676783692	0.612244898	30	1.116554282
11940	0.12	50	1.751758794	0.632653061	31	1.132478134
12299	0.042	50	0.595219124	0.653061224	32	1.146239211
12515	0.023	50	0.320327607	0.673469388	33	1.147078652
12165	0.08	50	1.146239211	0.693877551	34	1.214535732
11926	0.089	50	1.300746269	0.714285714	35	1.241244973
11924	0.089	50	1.300964441	0.734693878	36	1.247200943
12327	0.053	50	0.749403748	0.755102041	37	1.25007335
11768	0.109	50	1.614437458	0.775510204	38	1.287652216
12379	0.037	50	0.520970999	0.795918367	39	1.300746269
12460	0.082	50	1.147078652	0.816326531	40	1.300964441
12436	0.075	50	1.513702155	0.836734694	41	1.312941742
11886	0.108	50	1.099823322	0.857142857	42	1.319391206
12418	0.094	50	1.319391206	0.87755102	43	1.333642075
12535	0.015	50	0.208575987	0.897959184	44	1.475385518
11926	0.141	50	2.060732853	0.918367347	45	1.513702155
12318	0.091	50	1.287652216	0.93877551	46	1.614437458
12269	0.062	50	0.880805282	0.959183673	47	1.751758794
12452	0.043	50	0.601903309	0.979591837	48	2.060732853
12498	0.03	50	0.418386942	1	49	2.169768006

1.751758794 47 0.959184  
2.060732853 48 0.979592

**97.5th Percentile 1.9912137**

Graph Title Clay Boswell 2: 97.5th Percentile = 1.9912 lb Hg/TBtu

Clay Boswell 2: 97.5th Percentile = 1.9912 lb Hg/TBtu



Craig C3  
ALPHA

BETA  
0.6E4

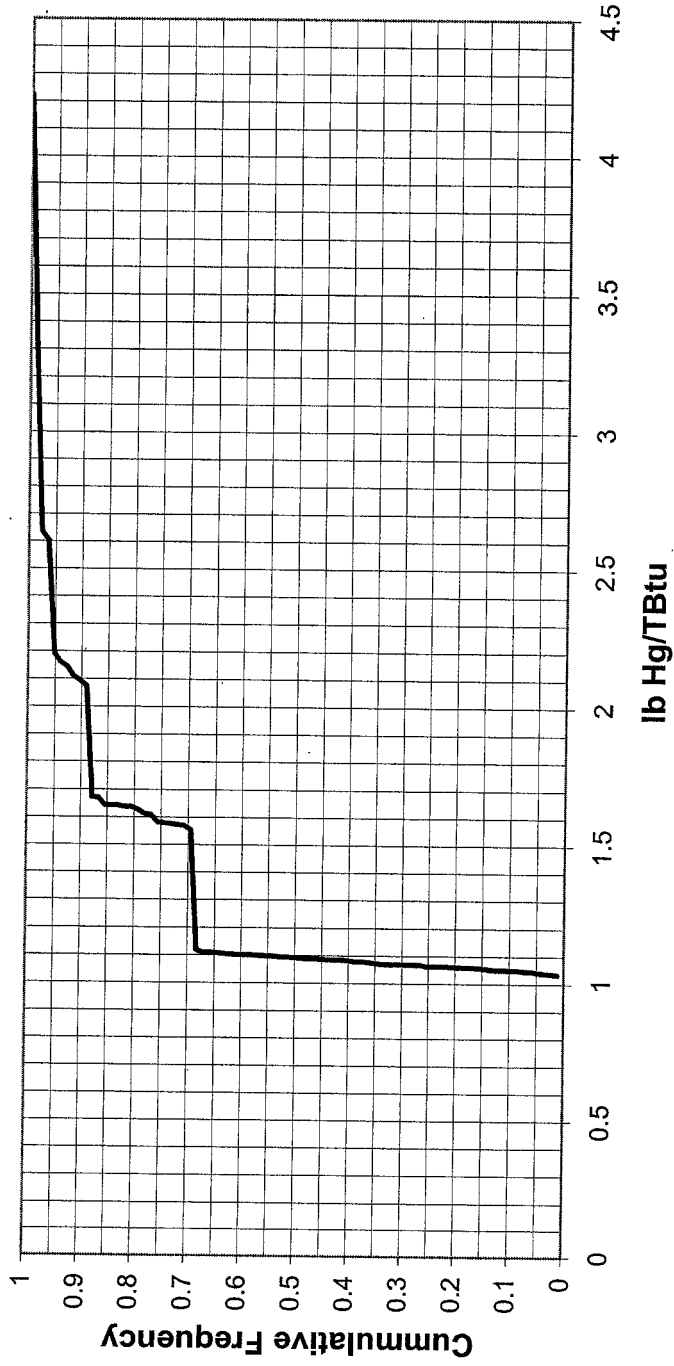
H (lb/Tbu) 0  
Hq(ppm)  
C(ppm)  
lb Hq/Tbu  
Cumulative Frequency  
Index  
Sorted lb Hq/Tbu

2.609513174 79 0.963415  
2.598904068 80 0.97961  
**97.5th Percentile = 2.6357385**

Graph Title Craig C3 97.5th Percentile = 2.6357 lb Hq/Tbu

H (lb/Tbu)	BETA	Hq(ppm)	C(ppm)	lb Hq/Tbu	Cumulative Frequency	Index	Sorted lb Hq/Tbu
12185	0.03	0.01	50	1.657484587	0.017185122	1	1.03521613
12650	0.03	0.01	50	1.373354011	0.024936244	2	1.037175983
12120	0.03	0.03	50	1.845394456	0.038365096	3	1.038079762
12760	0.04	0.04	50	2.5701122	0.046780498	4	1.041650226
12810	0.04	0.04	50	1.5525152	0.057976195	5	1.042164723
12695	0.03	0.03	50	1.570386881	0.073170732	6	1.044922227
11918	0.03	0.03	60	1.671421379	0.085336584	7	1.045823265
12236	0.02	0.02	50	1.085222001	0.097590978	8	1.048802372
12319	0.02	0.02	50	1.078009579	0.109756098	9	1.050779917
12541	0.02	0.02	50	1.068926272	0.121965122	10	1.052446473
12137	0.02	0.02	50	1.094174837	0.134146341	11	1.052446473
12952	0.03	0.03	50	1.059687201	0.146341463	12	1.055476077
12852	0.03	0.03	50	1.068789849	0.158536585	13	1.058221654
12915	0.03	0.03	50	1.046534865	0.170731707	14	1.058221654
12122	0.03	0.03	50	1.049348028	0.182922185	15	1.060687201
11912	0.06	0.06	50	3.344526528	0.195121055	16	1.060687201
12632	0.03	0.03	50	1.578647235	0.207317073	17	1.060687201
12431	0.02	0.02	50	1.058221654	0.219512105	18	1.0624
12418	0.02	0.02	50	1.068415365	0.231707317	19	1.062962777
12350	0.03	0.03	50	1.812955466	0.243902439	20	1.064017306
12432	0.02	0.02	50	1.068211068	0.256097581	21	1.064187836
12518	0.02	0.02	50	1.063872344	0.268292883	22	1.068125151
12247	0.02	0.02	50	1.064347187	0.280487805	23	1.068211068
12249	0.02	0.02	50	1.041653326	0.292682927	24	1.068298989
11298	0.02	0.02	50	0.902264211	0.304878049	25	1.068157073
11284	0.02	0.02	50	1.052620202	0.317073171	26	1.068157073
12618	0.02	0.02	50	1.052620202	0.329268293	27	1.070018552
11867	0.02	0.02	50	1.119069659	0.341463415	28	1.0707987
12783	0.02	0.02	50	1.038878762	0.353658537	29	1.074258629
12308	0.02	0.02	50	1.078973026	0.365853859	30	1.078009579
12752	0.05	0.05	50	2.809513174	0.378048778	31	1.078447286
12500	0.02	0.02	50	1.0624	0.390243902	32	1.078972028
12802	0.02	0.02	50	1.068724283	0.402439024	33	1.083109046
12802	0.02	0.02	50	1.044847846	0.414634146	34	1.083471787
12124	0.03	0.03	50	1.642021305	0.426829268	35	1.083471787
12614	0.03	0.03	50	1.578797717	0.439024390	36	1.085322001
12081	0.02	0.02	50	1.069246751	0.451219512	37	1.087365922
12850	0.02	0.02	50	1.048600372	0.463414634	38	1.087722172
12887	0.04	0.04	50	2.065481517	0.475609756	39	1.088524559
11609	0.06	0.06	50	4.222575517	0.487804878	40	1.089491049
11729	0.03	0.03	81	1.396333783	0.5	1.091387245	
11329	0.04	0.04	50	1.017893686	0.512165122	41	1.091387245
11262	0.04	0.04	50	2.189839844	0.524360244	42	1.093724283
12852	0.02	0.02	50	1.055478977	0.536555366	43	1.094910491
12387	0.04	0.04	50	2.144183418	0.548750488	44	1.094910491
12087	0.02	0.02	50	1.097762841	0.56097561	45	1.097762841
12590	0.04	0.04	50	2.09810802	0.573170732	46	1.098610192
12033	0.02	0.02	50	1.10663168	0.585365854	47	1.099246751
12188	0.02	0.02	50	1.091397245	0.597560978	48	1.100978279
12082	0.02	0.02	50	1.048916358	0.609756098	49	1.101691802
12082	0.02	0.02	50	1.06857098	0.621951216	50	1.101691802
12433	0.02	0.02	50	1.068125151	0.634146341	51	1.102165122
12247	0.02	0.02	50	1.064347187	0.646341463	52	1.102165122
12638	0.02	0.02	50	2.838804066	0.658536585	53	1.108241688
12591	0.05	0.05	50	1.050799177	0.670731707	54	1.108894436
12178	0.02	0.02	50	1.062926829	0.682926829	55	1.108984436
12883	0.02	0.02	50	1.062926829	0.695121951	56	1.109986689
12089	0.02	0.02	50	1.062926829	0.707317073	57	1.1106395129
12089	0.02	0.02	50	1.062926829	0.719512195	58	1.1106395129
12089	0.02	0.02	50	1.062926829	0.731707317	59	1.1106395129
12089	0.02	0.02	50	1.062926829	0.743902439	60	1.1106395129
12089	0.02	0.02	50	1.062926829	0.756097561	61	1.1106395129
12089	0.02	0.02	50	1.062926829	0.768292683	62	1.1106395129
12089	0.02	0.02	50	1.062926829	0.780487805	63	1.1106395129
12089	0.02	0.02	50	1.062926829	0.792682927	64	1.1106395129
12089	0.02	0.02	50	1.062926829	0.804878049	65	1.1106395129
12089	0.02	0.02	50	1.062926829	0.817073171	66	1.1106395129
12089	0.02	0.02	50	1.062926829	0.829268293	67	1.1106395129
12089	0.02	0.02	50	1.062926829	0.841463415	68	1.1106395129
12089	0.02	0.02	50	1.062926829	0.853658537	69	1.1106395129
12089	0.02	0.02	50	1.062926829	0.865853859	70	1.1106395129
12189	0.03	0.03	50	1.638292623	0.878048778	71	1.1106395129
12081	0.02	0.02	50	1.064017306	0.890243902	72	1.1106395129
12081	0.02	0.02	50	1.01066583	0.902439024	73	2.075162122
12081	0.02	0.02	50	1.070018532	0.914634146	74	2.093481517
12081	0.02	0.02	50	1.05561108	0.926829268	75	2.144183418
12081	0.02	0.02	50	1.064187836	0.939024390	76	2.160552049
12081	0.02	0.02	50	1.064187836	0.951219512	77	2.160552049
12081	0.02	0.02	50	2.160552049	0.963414634	78	2.160552049
12213	0.02	0.02	50	1.087365922	0.975609756	79	2.160552049
12668	0.02	0.02	50	1.04862327	0.987804878	80	2.639604066
11981	0.02	0.02	50	1.108421668	0.997804878	81	3.344526528
			50			82	4.222575517

Craig C3: 97.5th Percentile = 2.6351 lb Hg/TBtu



**Cholla 3 ALPHA**

BETA  
0.358

H (lb/Btu)

Ct(ppm)

lb Hg/TBU

Cumulative  
Frequency

Index

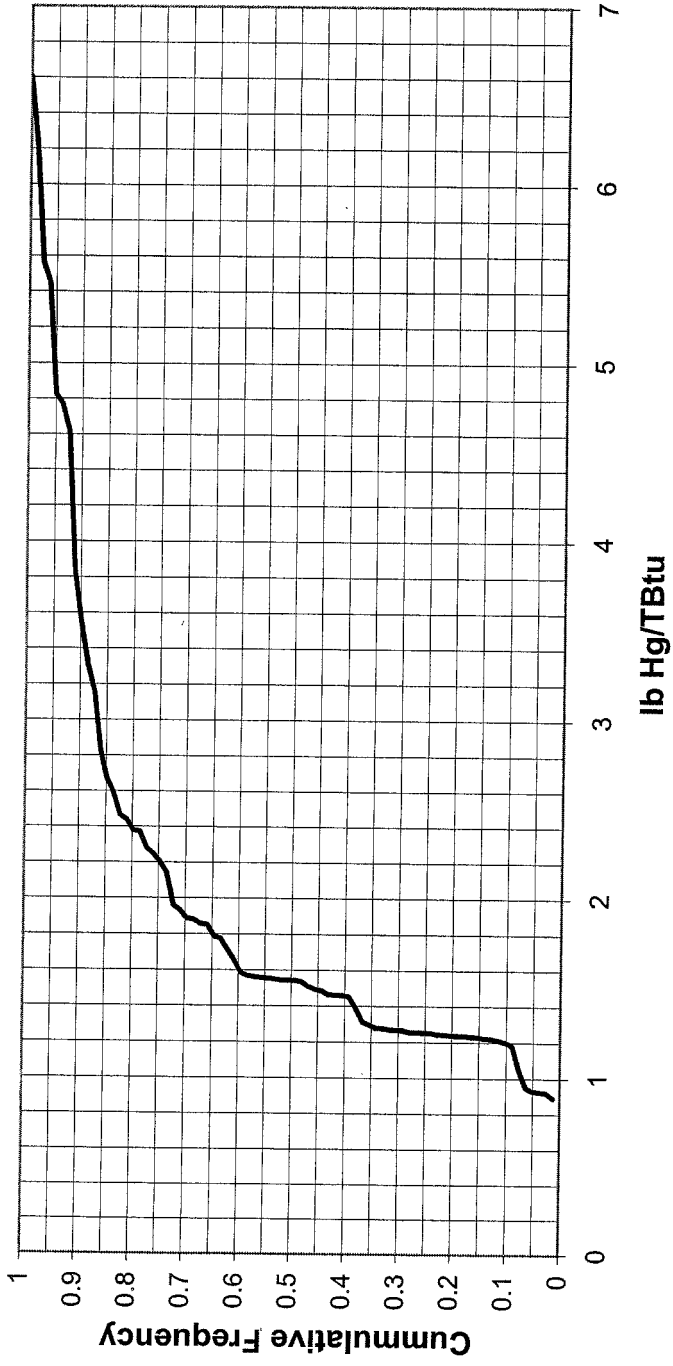
Sorted lb Hg/TBU

5.566414827 77 0.97468  
6.230273034 77 0.96734  
**97.5th Percentile = 5.5630252**

Graph Title Cholla 3: 97.5th Percentile = 5.5630 lb Hg/TBU

H (lb/Btu)	BETA	Ct(ppm)	lb Hg/TBU	Cumulative Frequency	Index	Sorted lb Hg/TBU
9902	0.04	100	1.460928342	0.012658228	1	0.829290771
10017	0.05	100	1.786821164	0.025316458	2	0.920702656
9856	0.04	100	1.452922078	0.037974684	3	0.924864928
10219	0.03	100	1.059893462	0.050632911	4	0.939511642
9643	0.06	100	2.04433498	0.063291139	5	0.94750719
9643	0.04	100	1.463191637	0.075949366	6	1.02174341
9643	0.04	100	1.463191637	0.088606755	7	1.02174341
8420	0.06	100	2.280254777	0.101265823	8	1.02174341
9707	0.08	100	3.319254146	0.113924051	9	1.201745552
10077	0.13	100	4.18438027	0.126582278	10	1.221947285
10100	0.08	100	2.835643564	0.139240506	11	1.229513329
9685	0.07	100	2.592860838	0.151898734	12	1.231404248
9541	0.06	100	2.251336338	0.164556962	13	1.231722002
10075	0.05	100	1.778749838	0.17721519	14	1.237683665
9240	0.04	100	1.54978355	0.189873418	15	1.239117707
9586	0.04	100	1.489845181	0.202531646	16	1.240574706
9687	0.05	100	1.851660288	0.215189873	17	1.243055956
9644	0.13	100	4.825798424	0.227848101	18	1.245433989
11542	0.03	100	0.930514862	0.240506329	19	1.250672553
11520	0.04	100	1.048484848	0.253164558	20	1.253164558
10986	0.06	100	2.280254777	0.265822785	21	1.253164558
11625	0.06	100	1.860569581	0.278481013	22	1.256691531
9214	0.17	100	8.860875327	0.291139241	23	1.267368794
9031	0.06	100	6.06168052	0.303797468	24	1.269166002
11488	0.04	100	2.378474145	0.316455696	25	1.269603546
9058	0.06	100	1.245433989	0.329113924	26	1.274308665
9004	0.12	100	4.771212794	0.341772152	27	1.278913995
11283	0.04	100	1.269168002	0.354430338	28	1.279688171
12527	0.02	100	0.897088009	0.367088009	29	1.313520455
11625	0.04	100	1.489845181	0.3797468	30	1.313520455
11289	0.04	100	1.489845181	0.392405063	31	1.462920278
11665	0.03	100	1.267368794	0.405063291	32	1.460181503
11410	0.05	100	0.820702656	0.417721519	33	1.460928342
11035	0.04	100	1.568759299	0.430379747	34	1.462537789
10297	0.04	100	1.297689171	0.443037975	35	1.485015037
11210	0.04	100	1.399596319	0.455696203	36	1.489845181
11625	0.06	100	1.274308665	0.468354443	37	1.509859743
11075	0.04	100	1.834098881	0.481012658	38	1.530085128
11625	0.04	100	1.236111138	0.493670895	39	1.530085128
11625	0.04	100	1.236111138	0.506329113	40	1.530085128
9644	0.14	100	5.451914328	0.518987342	41	1.544301613
9644	0.05	100	1.850763317	0.53164557	42	1.548763955
11591	0.05	100	1.544301613	0.544303797	43	1.554156718
11192	0.12	100	3.83845604	0.556962025	44	1.558782485
9004	0.04	100	1.589644927	0.569620253	45	1.561273441
9058	0.08	100	3.161845882	0.582278481	46	1.568799299
9214	0.04	100	1.554156718	0.594936709	47	1.569494943
11075	0.11	100	3.785782485	0.607594937	48	1.553732446
11075	0.11	100	3.785782485	0.620253165	49	1.553732446
10721	0.08	100	2.671392584	0.632911392	50	1.768827838
11625	0.04	100	1.231722002	0.645582278	51	1.768827838
11468	0.05	100	1.556752486	0.658227848	52	1.851660288
11605	0.05	100	1.542438604	0.670886076	53	1.856076317
11857	0.05	100	1.506685743	0.683544304	54	1.880087527
12107	0.04	100	1.827786818	0.696202532	55	1.887853753
11900	0.04	100	1.213959322	0.708860759	56	1.894089681
11409	0.04	100	1.285148443	0.721518987	57	1.905995951
11378	0.06	100	1.514898734	0.734177215	58	1.905995951
11444	0.04	100	1.236111138	0.746835443	59	2.101433498
11704	0.07	100	1.236111138	0.759493671	60	2.251336338
11569	0.04	100	2.141148325	0.772151899	61	2.280254777
11610	0.08	100	1.238111707	0.784810127	62	2.371384412
11597	0.05	100	2.466636932	0.797468354	63	2.378474145
11543	0.05	100	1.54350283	0.810126582	64	2.437861764
11633	0.05	100	1.536085128	0.82278481	65	2.466838932
10824	0.05	100	1.240579706	0.835443038	66	2.466838932
11748	0.08	100	1.653732446	0.848101266	67	2.871392584
11002	0.04	100	2.437861764	0.860759494	68	2.871392584
11002	0.04	100	1.313520455	0.873417721	69	3.319254146
11289	0.04	100	1.236111138	0.886075949	70	3.319254146
11385	0.04	100	1.269603546	0.898734177	71	3.319254146
11197	0.04	100	2.958691531	0.911392405	72	3.83845604
11465	0.05	100	1.278913995	0.924050633	73	4.818438027
11335	0.03	100	1.561273441	0.936708881	74	4.771212794
11611	0.03	100	0.947507718	0.949367089	75	5.451914328
11570	0.04	100	0.924984928	0.962025316	76	5.451914328
11719	0.04	100	1.237683665	0.974683544	77	5.86414827
11916	0.04	100	1.221947285	0.987341772	78	6.230273034
11916	0.04	100	1.201745552	0.997341772	79	6.602160602

**Cholla 3: 97.5th Percentile = 5.5830 lb Hg/TBtu**





Heskett B2  
ALPHA

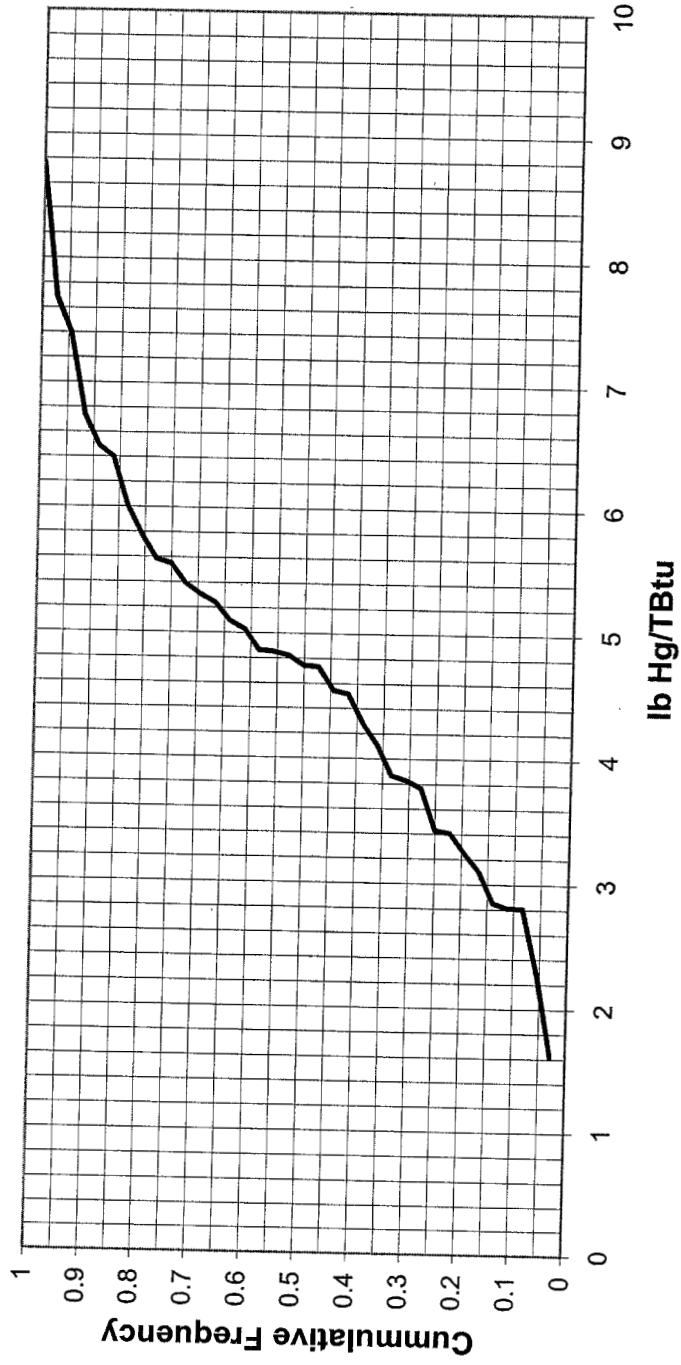
H (lb/Btu)	Hg(ppm)	Ci(ppm)	lb Hg/TBtu	Cummulative Frequency	Index	Sorted lb Hg/TBtu
11115	0.095	200	5.097435897	0.027777778	1	1.617575264
11218	0.165	200	8.772151899	0.055555556	2	2.288606667
10941	0.087	200	4.742418426	0.083333333	3	2.808113003
10882	0.088	200	4.82293696	0.111111111	4	2.810706029
11041	0.137	200	7.400307943	0.138888889	5	2.851271874
11105	0.072	200	3.866798739	0.166666667	6	3.102349776
11044	0.052	200	2.808113003	0.194444444	7	3.250586605
11150	0.058	200	3.102349776	0.222222222	8	3.408608668
11090	0.143	200	7.690279531	0.25	9	3.428857567
11135	0.08	200	4.294867535	0.277777778	10	3.766970091
11040	0.107	200	5.780326087	0.305555556	11	3.827569375
11059	0.125	200	6.741115833	0.333333333	12	3.866798739
11035	0.09	200	4.664159493	0.361111111	13	4.109747031
11026	0.093	200	5.030400871	0.388888889	14	4.284867535
11943	0.13	200	6.491836222	0.416666667	15	4.518996933
10996	0.103	200	5.586504183	0.444444444	16	4.546399706
11087	0.088	200	4.73376026	0.472222222	17	4.73376026
11008	0.111	200	6.013844477	0.5	18	4.742418426
10935	0.089	200	4.854101509	0.527777778	19	4.82293696
10854	0.101	200	5.549695965	0.555555556	20	4.854101509
10888	0.083	200	4.546399706	0.583333333	21	4.864159493
11086	0.084	200	4.518996933	0.611111111	22	5.030400871
10945	0.042	200	2.288606667	0.638888889	23	5.097435897
11246	0.053	200	2.810706029	0.666666667	24	5.242262275
11063	0.071	200	3.827569375	0.694444444	25	5.309038006
11263	0.099	200	5.242262275	0.722222222	26	5.392405063
10825	0.059	200	3.250586605	0.75	27	5.549695965
10766	0.068	200	3.766970091	0.805555556	28	5.586504183
11060	0.1	200	5.392405063	0.833333333	29	5.780326087
11029	0.076	200	4.109747031	0.861111111	30	6.013844477
11009	0.098	200	5.309038006	0.888888889	31	6.402220988
11086	0.053	200	2.851271874	0.916666667	32	6.491836222
11198	0.064	200	3.408608668	0.944444444	33	6.741115833
10784	0.062	200	3.428857567	0.972222222	34	7.400307943
10806	0.116	200	6.402220988	1	35	7.690279531
					36	8.772151899

7.690279531 35 0.972222  
8.772151899 36

**97.5th Percentile 7.7984668**

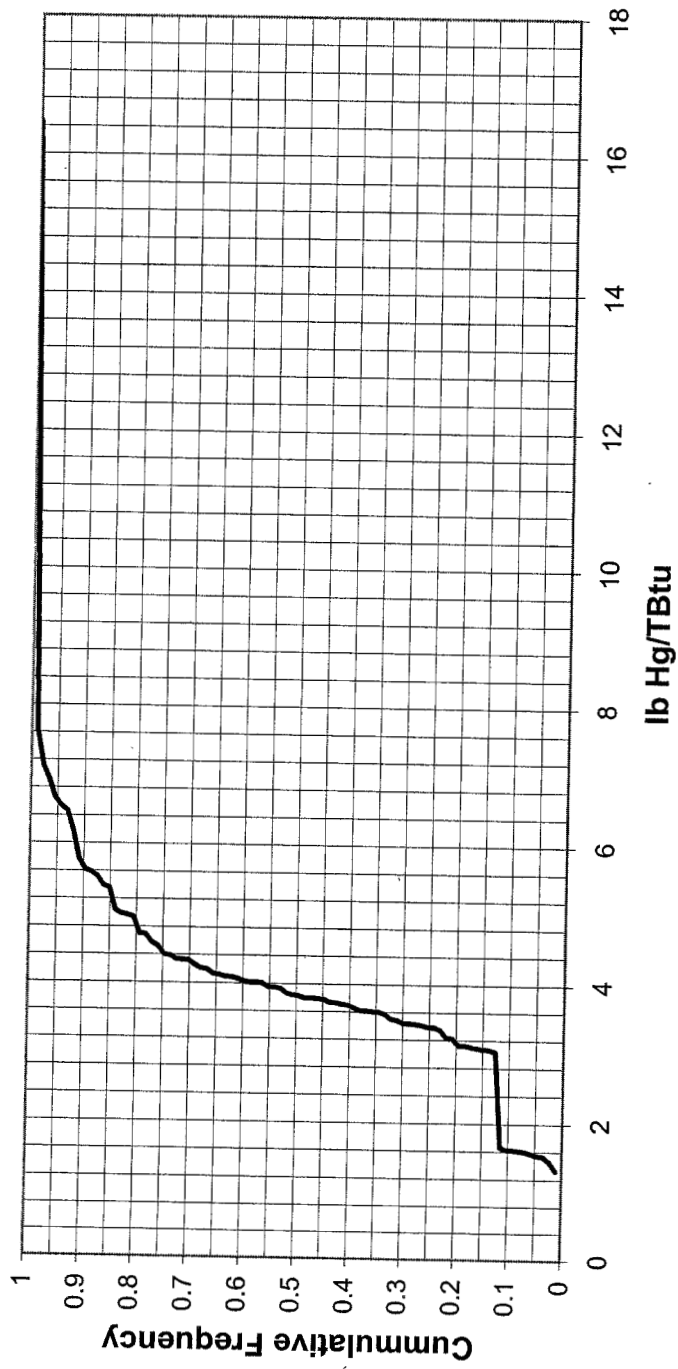
Graph Title Heskett B2: 97.5th Percentile = 7.7985 lb Hg/TBtu

Heskett B2: 97.5th Percentile = 7.7985 lb Hg/TBtu



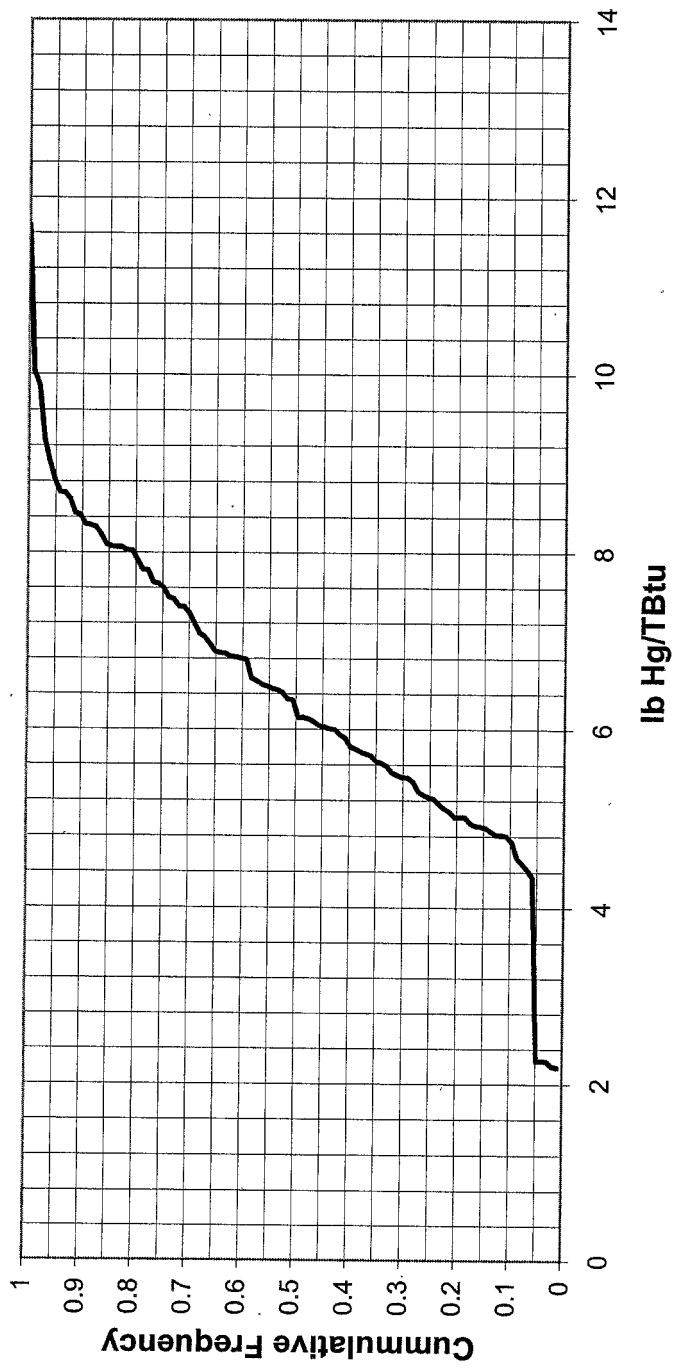


Antelope B1: 97.5th Percentile = 7.0870 lb Hg/TBtu





Leland 2: 97.5th Percentile = 9.5323 lb Hg/Tbtu

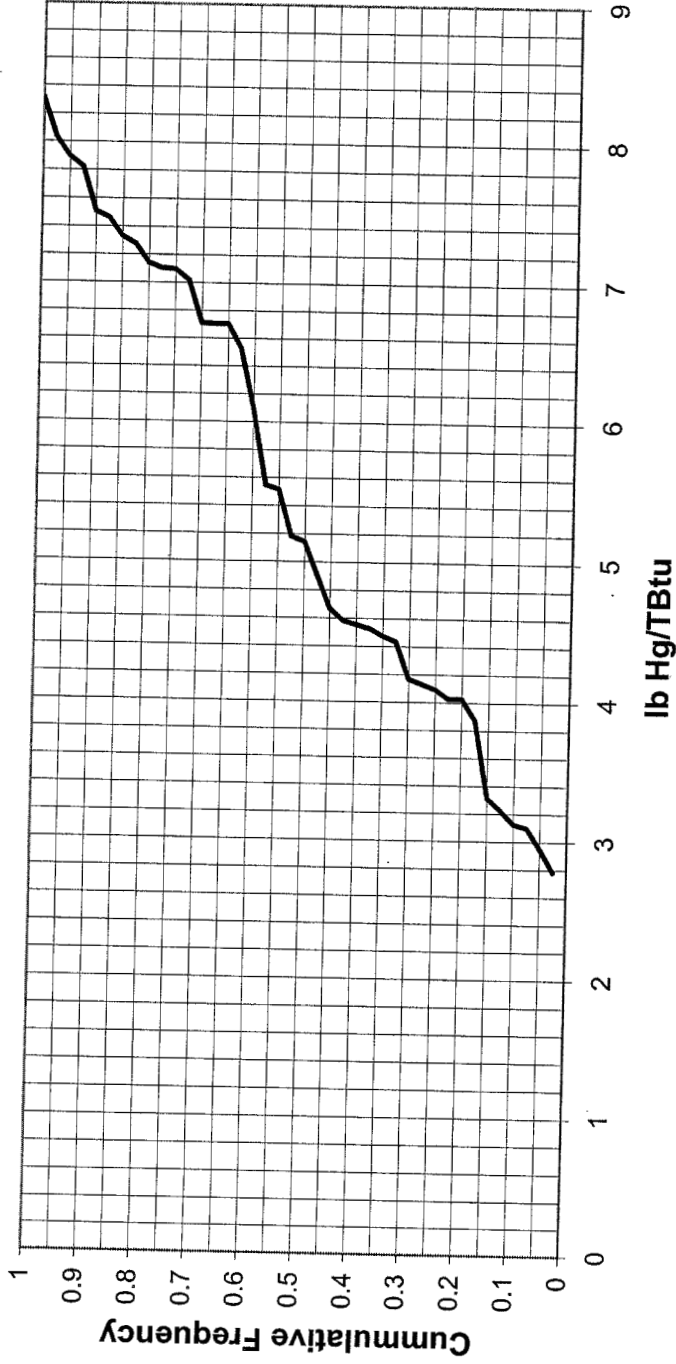


**Stanton 10**  
**ALPHA**  
 0.002164007 0.818815299  
**BETA**  
 8.02894476  
 8.315724687  
**97.5th Percentile 8.0289448**

**Graph Title**  
 Stanton 10: 97.5th Percentile = 8.0289 lb Hg/TBtu

H (lb/Btu)	Hg(ppm)	Ci(ppm)	lb Hg/TBtu	Cummulative Frequency	Index	Sorted lb Hg/TBtu
10850	0.069	74	4.43668061	0.025	1	2.785579397
11000	0.082	79	5.144718635	0.05	2	2.951148004
10870	0.064	83	4.02839108	0.075	3	3.099866029
10960	0.076	99	4.582971675	0.1	4	3.125431775
10690	0.077	108	4.668730532	0.125	5	3.22797068
10920	0.081	141	4.476455081	0.15	6	3.315013318
10570	0.074	106	4.557452525	0.175	7	3.875310863
10730	0.073	134	4.16844142	0.2	8	4.026578732
10870	0.085	123	4.906569167	0.225	9	4.02839108
10570	0.065	121	3.875310863	0.25	10	4.094887148
10900	0.079	125	4.528032179	0.275	11	4.129775162
10600	0.067	116	4.026578732	0.3	12	4.16844142
10680	0.072	138	4.094887148	0.325	13	4.436688061
10870	0.084	92	5.185284516	0.35	14	4.476455081
10620	0.055	141	3.125431775	0.375	15	4.528032179
10650	0.051	158	2.785579397	0.4	16	4.557452525
10680	0.054	115	3.22797068	0.425	17	4.582971675
10630	0.067	103	4.129775162	0.45	18	4.668730532
10660	0.05	99	3.099866029	0.475	19	4.906569167
10750	0.051	127	2.951148004	0.5	20	5.144718635
10480	0.052	94	3.315013318	0.525	21	5.185284516
10500	0.104	88	6.703878807	0.55	22	5.517398572
10510	0.104	87	6.712009366	0.575	23	5.546711282
10500	0.104	88	6.703878807	0.6	24	6.095774359
10610	0.116	107	7.101796277	0.625	25	6.528191494
10850	0.118	82	7.330764416	0.65	26	6.703878807
10300	0.116	64	8.02894476	0.675	27	6.703878807
10620	0.115	108	7.018739306	0.7	28	6.712009366
10770	0.115	135	6.528191494	0.725	29	7.018739306
10390	0.115	87	7.50765355	0.75	30	7.09522177
10490	0.115	97	7.276895189	0.775	31	7.101796277
10520	0.115	84	7.463172503	0.8	32	7.138178881
10370	0.115	114	7.09522177	0.825	33	7.276895189
10680	0.091	106	5.546711282	0.85	34	7.330764416
10760	0.091	105	5.517398572	0.875	35	7.463172503
10460	0.091	72	6.095774359	0.9	36	7.50765355
10650	0.12	72	7.894875985	0.925	37	7.822592863
10310	0.12	63	8.315724687	0.95	38	7.894875985
10640	0.12	119	7.138178881	0.975	39	8.02894476
10590	0.119	75	7.822592863	1	40	8.315724687

Stanton 10: 97.5th Percentile = 8.0289 lb Hg/TBtu





Stanton 1  
ALPHA

BETA  
0.5591

0

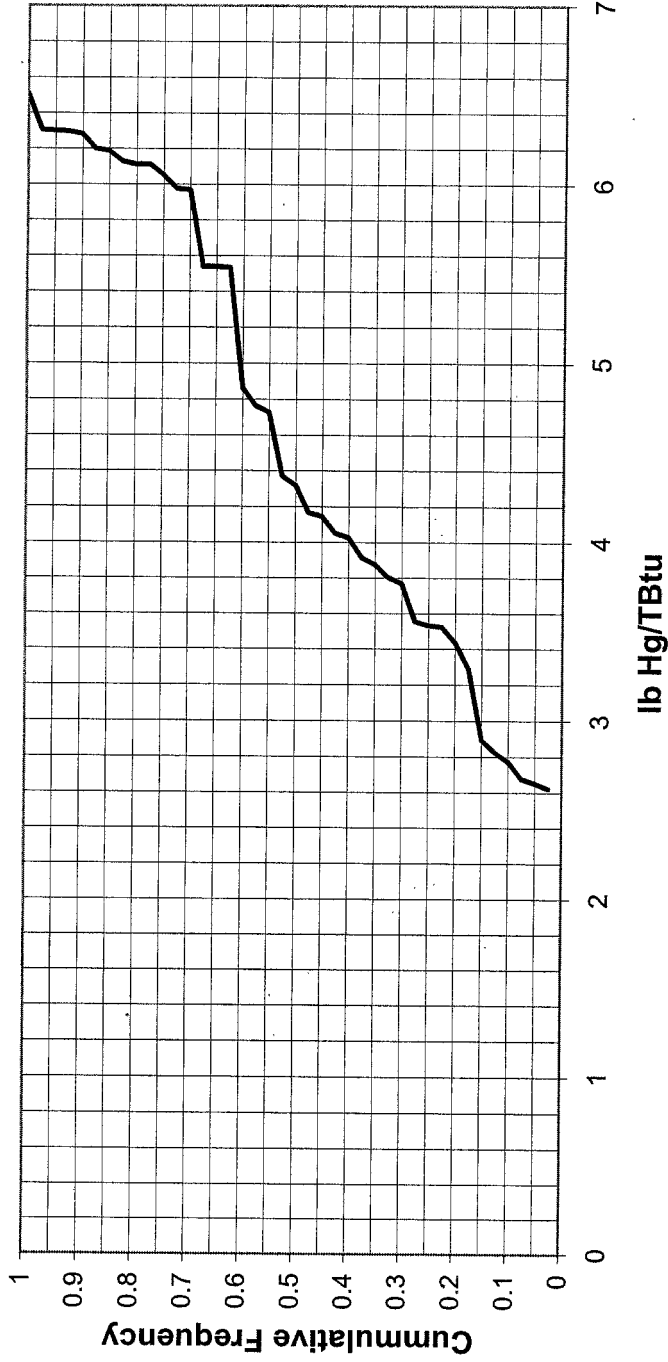
H (lb/Btu)	Hg(ppm)	Cl(ppm)	lb Hg/TBtu	Cummulative Frequency	Index	Sorted lb Hg/TBtu
10850	0.069	74	3.55556682	0.025	1	2.622420263
11000	0.082	79	4.167836364	0.05	2	2.652474419
10870	0.064	83	3.291849126	0.075	3	2.677380282
10960	0.076	99	3.876970803	0.1	4	2.774160305
10690	0.077	108	4.027193639	0.125	5	2.826910112
10920	0.081	141	4.14717033	0.15	6	2.895527307
10570	0.074	106	3.91422895	0.175	7	3.291849126
10730	0.073	134	3.803755825	0.2	8	3.438174078
10870	0.085	123	4.371987121	0.225	9	3.523960489
10570	0.065	121	3.438174078	0.25	10	3.533933962
10900	0.079	125	4.052192661	0.275	11	3.55556682
10600	0.067	116	3.533933962	0.3	12	3.769213483
10680	0.072	138	3.769213483	0.325	13	3.803755825
10870	0.084	92	4.320551978	0.35	14	3.876970803
10620	0.055	141	2.895527307	0.375	15	3.91422895
10650	0.051	158	2.677380282	0.4	16	4.027193639
10680	0.054	115	2.826910112	0.425	17	4.052192661
10630	0.067	103	3.523960489	0.45	18	4.14717033
10660	0.05	99	2.622420263	0.475	19	4.167836364
10750	0.051	127	2.652474419	0.5	20	4.320551978
10480	0.052	94	2.774160305	0.525	21	4.371987121
10500	0.104	88	5.537752381	0.55	22	4.728447955
10500	0.104	88	5.537752381	0.575	23	4.763867041
10610	0.116	107	6.112686145	0.6	24	4.864063098
10850	0.116	82	5.977474654	0.625	25	5.532483349
10300	0.116	64	6.296660194	0.65	26	5.537752381
10620	0.115	108	6.054284369	0.675	27	5.537752381
10770	0.115	135	5.96996286	0.7	28	5.96996286
10390	0.115	87	6.188306064	0.725	29	5.977474654
10490	0.115	97	6.129313632	0.75	30	6.054284369
10520	0.115	84	6.111834601	0.775	31	6.111834601
10370	0.115	114	6.20024108	0.8	32	6.112686145
10680	0.091	106	4.763867041	0.825	33	6.129313632
10760	0.091	105	4.728447955	0.85	34	6.188306064
10460	0.091	72	4.864063098	0.875	35	6.20024108
10650	0.12	72	6.29971831	0.9	36	6.282615675
10340	0.12	63	6.507468477	0.925	37	6.296660194
10640	0.12	119	6.305639098	0.95	38	6.29971831
10590	0.119	75	6.305639098	0.975	39	6.305639098
			6.282615675	1	40	6.507468477

6.305639098 39 0.975  
6.507468477 40 1

**97.5th Percentile 6.3056391**

Graph Title Stanton 1: 97.5th Percentile = 6.3056 lb Hg/TBtu

**Stanton 1: 97.5th Percentile = 6.3056 lb Hg/TBtu**



Kline 1

ALPHA 0 BETA 0.0025

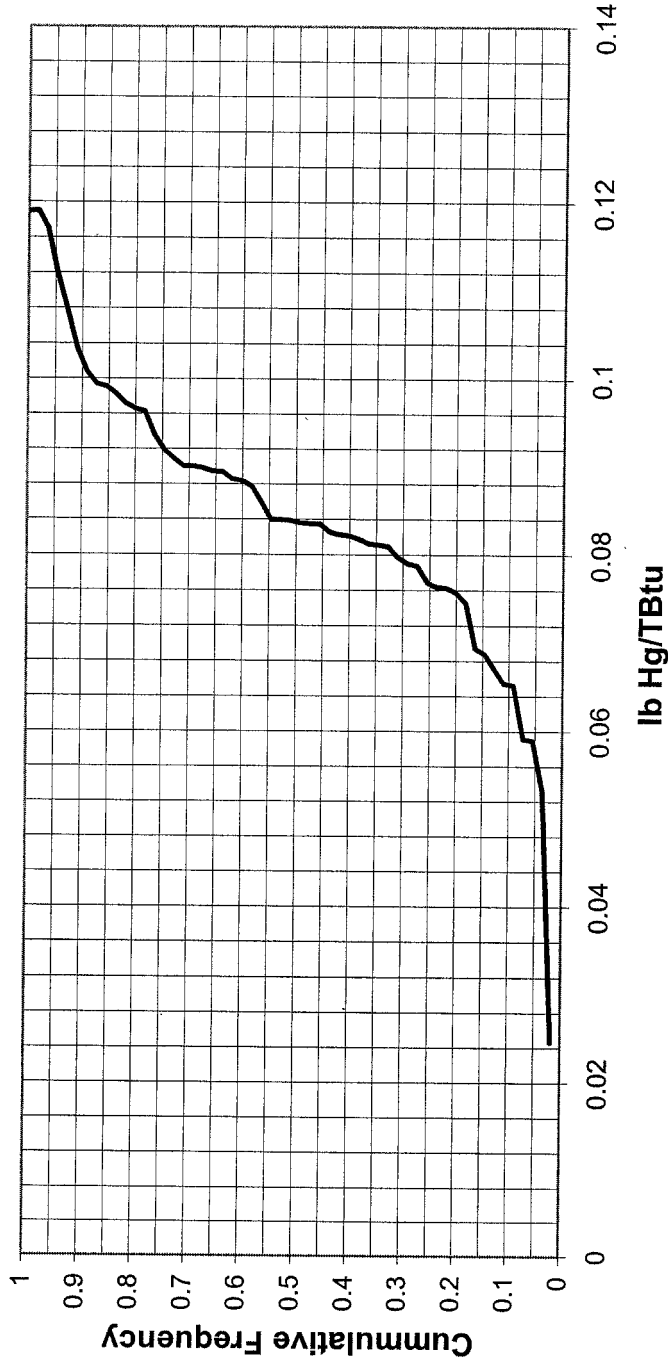
H (lb/Btu)	Hg(ppm)	Cl(ppm)	lb Hg/Tbu	Cumulative Frequency	Index	Sorted lb Hg/Tbu
5238	0.16	100	0.076365025	0.018181818	1	0.024703557
5296	0.21	100	0.03913142	0.036363636	2	0.053180642
5092	0.18	100	0.08837392	0.054545455	3	0.058949625
5230	0.17	100	0.08126195	0.072727273	4	0.059159929
5246	0.16	100	0.07624857	0.090909091	5	0.065234845
5347	0.14	100	0.065457266	0.109090909	6	0.065457266
5397	0.17	100	0.078747452	0.127272727	7	0.067086365
5362	0.19	100	0.088586348	0.145454545	8	0.068775791
5364	0.16	100	0.074571216	0.163636364	9	0.069444444
5173	0.11	100	0.053160642	0.181818182	10	0.074571216
5089	0.14	100	0.068775791	0.2	11	0.075728691
5082	0.17	100	0.083628493	0.218181818	12	0.07624857
5060	0.05	100	0.024703557	0.236363636	13	0.076366025
5400	0.15	100	0.069444444	0.254545455	14	0.076870516
5288	0.19	100	0.089826021	0.272727273	15	0.078747452
5217	0.17	200	0.090909091	0.290909091	16	0.078988942
5071	0.14	100	0.067088365	0.309090909	17	0.079707427
5239	0.12	100	0.059159929	0.327272727	18	0.080921554
5313	0.19	100	0.081122352	0.345454545	19	0.081122352
5316	0.22	100	0.103461249	0.363636364	20	0.08126195
5277	0.19	100	0.090013265	0.381818182	21	0.081777949
5166	0.17	100	0.08228868	0.4	22	0.082108902
5091	0.17	100	0.083480652	0.418181818	23	0.08228868
4769	0.16	100	0.083875028	0.436363636	24	0.082572372
4710	0.19	100	0.091876209	0.454545455	25	0.083480652
5129	0.24	100	0.100849257	0.472727273	26	0.083503433
5389	0.18	100	0.083503433	0.490909091	27	0.083628493
5252	0.17	100	0.080921554	0.509090909	28	0.083875028
5146	0.23	200	0.111737272	0.527272727	29	0.083927822
4622	0.22	100	0.118995106	0.545454545	30	0.083986562
4665	0.11	100	0.058949625	0.563636364	31	0.085910653
3703	0.13	100	0.087766676	0.581818182	32	0.087766676
5178	0.2	100	0.096562379	0.6	33	0.08837392
5197	0.17	100	0.08177949	0.618181818	34	0.088586348
4406	0.19	100	0.089445438	0.636363636	35	0.08940335
5147	0.17	100	0.082572372	0.654545455	36	0.089445438
4982	0.13	100	0.07807535	0.672727273	37	0.089826021
4766	0.16	100	0.082572372	0.690909091	38	0.090013265
4934	0.19	100	0.085234845	0.709090909	39	0.090030326
5074	0.19	100	0.083927822	0.727272727	40	0.090909091
5064	0.16	100	0.096270774	0.745454545	41	0.091876209
5145	0.2	100	0.093614505	0.763636364	42	0.093614505
5358	0.18	100	0.078988942	0.781818182	43	0.096270774
5086	0.2	100	0.078988942	0.8	44	0.096270774
5854	0.18	100	0.09718173	0.818181818	45	0.09718173
5238	0.18	100	0.083986562	0.836363636	46	0.09837392
5332	0.17	100	0.086309084	0.854545455	47	0.09913142
5282	0.16	100	0.076870516	0.872727273	48	0.09941299
5785	0.19	100	0.085910653	0.890909091	49	0.100849257
5043	0.24	100	0.079707427	0.909090909	50	0.103461249
5281	0.21	100	0.082108902	0.927272727	51	0.107807535
5276	0.19	200	0.09941299	0.945454545	52	0.111737272
			0.090030326	0.963636364	53	0.116981868
				0.981818182	54	0.1189768
				1	55	0.118996106

0.116981868 53 0.963636  
0.1189768 54 0.981818

**97.5th Percentile 0.1182287**

Graph Title Kline 1: 97.5th Percentile = 0.1182 lb Hg/Tbu

**Kline 1: 97.5th Percentile = 0.1182 lb Hg/TBtu**



Scrubgrass 1

ALPHA 0 BETA 0.0011

H (lb/Btu)	Hg(ppm)	C(ppm)	lb Hg/TBtu	Cummulative Frequency	Index	Sorted lb Hg/TBtu
7621	0.67	900	0.096706469	0.019607843	1	0.044132397
7646	0.57	900	0.082003662	0.039215686	2	0.056424371
8045	0.83	1200	0.113486638	0.058823529	3	0.066726897
7636	0.56	897	0.080670508	0.078431373	4	0.070203979
7968	0.77	997	0.106300201	0.098039216	5	0.070827142
7047	0.71	997	0.110827302	0.117647059	6	0.073682855
7679	1.01	1295	0.152882895	0.137254902	7	0.073795787
7879	0.67	1047	0.0935539789	0.156862745	8	0.073973572
7915	1.08	1146	0.158083832	0.176470588	9	0.074977061
7704	0.57	997	0.086351742	0.196078431	10	0.079302661
6645	0.59	1278	0.084241952	0.215686275	11	0.080380532
6645	0.5	1621	0.082768999	0.235294118	12	0.080480794
7977	0.87	1247	0.119969914	0.254901961	13	0.080670508
7846	1	1387	0.140198827	0.274509804	14	0.080956762
7893	0.9	1535	0.125427594	0.294117647	15	0.08113804
7629	0.55	1319	0.079302661	0.31372549	16	0.082003662
7510	0.76	1597	0.111318242	0.333333333	17	0.082706899
8370	0.71	1696	0.093309438	0.352941176	18	0.082822869
7807	0.63	1455	0.088766492	0.37254902	19	0.084241952
7499	0.57	1410	0.080580902	0.392156863	20	0.084241952
7735	1.08	1590	0.158421123	0.411764706	21	0.086351742
7604	0.72	1828	0.102391726	0.431372549	22	0.086761315
7476	0.95	1418	0.13742767	0.450980392	23	0.088766492
7629	0.85	1350	0.125066881	0.470588235	24	0.08988764
8076	0.52	1022	0.074977061	0.490196078	25	0.093309438
8163	0.8	1306	0.107803504	0.509803922	26	0.093539789
8241	0.65	1201	0.086761315	0.529411765	27	0.096706469
7922	0.84	2120	0.116637213	0.549019608	28	0.102391726
7730	0.73	1709	0.103880983	0.568627451	29	0.103680983
7592	0.66	4277	0.08113804	0.588235294	30	0.106300201
7836	0.59	1923	0.082822869	0.607843137	31	0.107087227
7609	0.56	1531	0.080956762	0.62745098	32	0.107803504
7763	0.52	1398	0.073682855	0.647058824	33	0.110827302
8476	0.57	2774	0.073973572	0.666666667	34	0.111318242
7993	0.41	1712	0.056424371	0.68627451	35	0.114410839
7453	0.5	1789	0.073795787	0.705882353	36	0.116637213
7748	0.47	1820	0.066726897	0.725490196	37	0.119066249
7976	0.32	1650	0.044132397	0.745098039	38	0.119969914
7654	0.56	1266	0.080480794	0.764705882	39	0.121584699
8052	0.89	1058	0.121584699	0.784313725	40	0.125066881
7794	0.89	1607	0.125609443	0.803921569	41	0.125427594
7253	0.53	2003	0.080380632	0.823529412	42	0.125609443
7048	0.89	1008	0.138904654	0.843137255	43	0.13742767
7097	0.97	1172	0.150345216	0.862745098	44	0.13742767
7668	0.83	1309	0.119066249	0.882352941	45	0.138904654
7704	0.75	1390	0.107087227	0.901960784	46	0.140198827
7307	0.76	2123	0.114410839	0.921568627	47	0.150345216
6755	0.95	1055	0.154700222	0.941176471	48	0.152882895
7832	0.64	1607	0.08988764	0.960784314	49	0.154700222
				0.980392157	50	0.158083832
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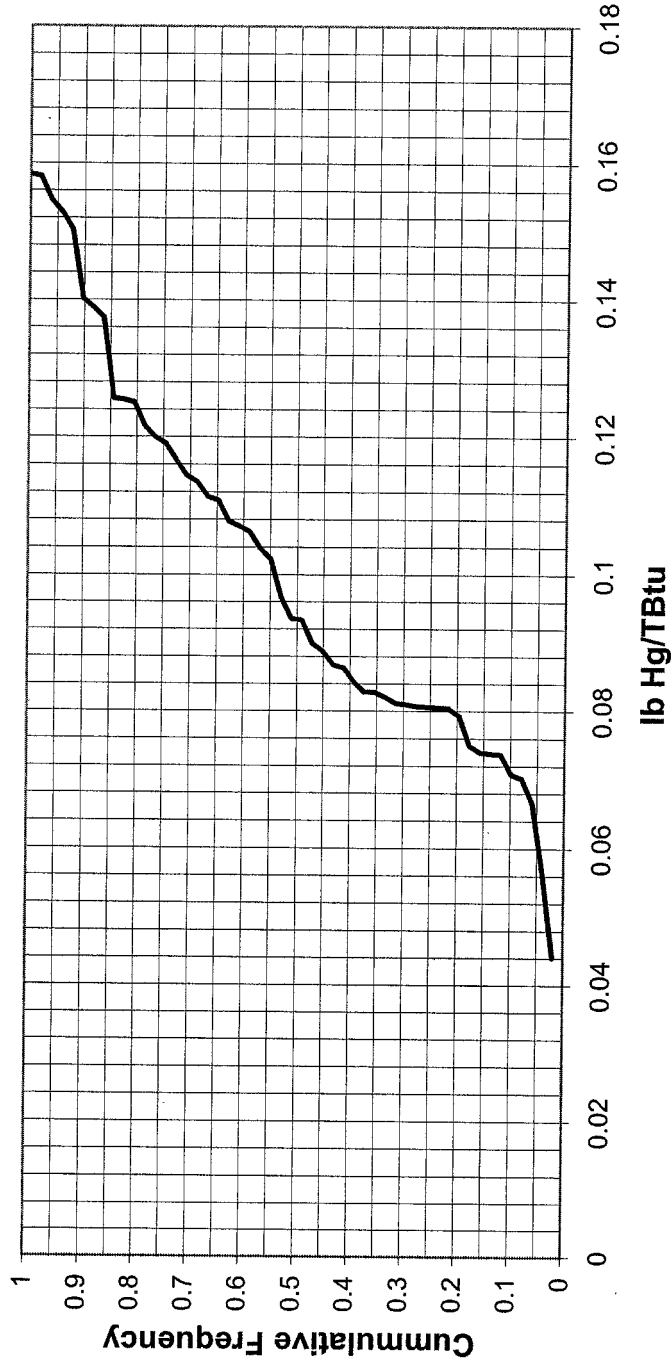
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49 0.960784  
50 0.980392

**97.5th Percentile 0.1571533**

Graph Title Scrubgrass 1: 97.5th Percentile = 0.1572 lb Hg/TBtu

Scrubgrass 1: 97.5th Percentile = 0.1572 lb Hg/TBtu



**Polk 1  
ALPHA**

BETA  
0 0.6601

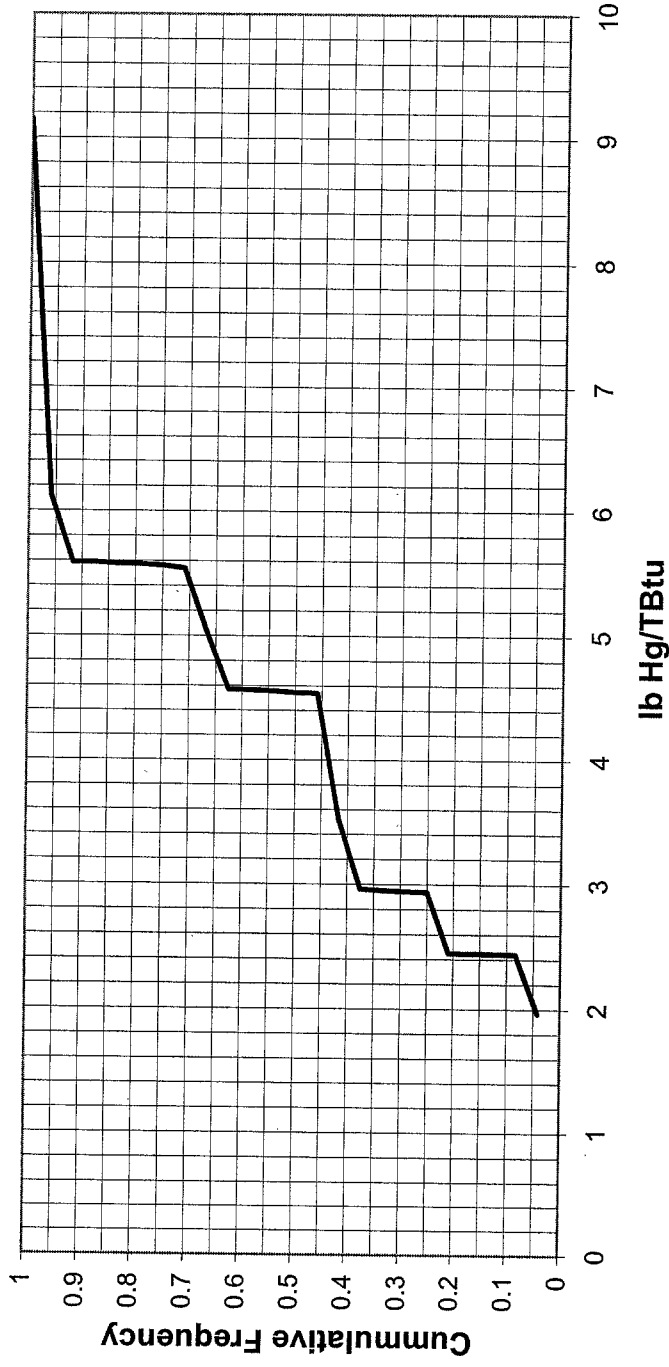
H (lb/Btu)	Hg(ppm)	Cl(ppm)	lb Hg/TBtu	Cummulative Frequency	Index	Sorted lb Hg/TBtu
12931	0.12	1000	6.125744335	0.041666667	1	1.967364578
12987	0.18	1100	9.148995149	0.083333333	2	2.4413788
12996	0.11	1100	5.587180671	0.125	3	2.444995926
12997	0.09	800	4.570977918	0.166666667	4	2.446808511
12998	0.11	900	5.586320972	0.208333333	5	2.448987163
13009	0.09	600	4.566761473	0.25	6	2.938130564
13022	0.11	1000	5.576025188	0.291666667	7	2.942933571
13029	0.11	800	5.573029396	0.333333333	8	2.950827
13036	0.09	1000	4.557302854	0.375	9	2.962525245
13053	0.11	1100	5.562782502	0.416666667	10	3.529137707
13074	0.09	1000	4.544056907	0.458333333	11	4.53919621
13088	0.09	1100	4.53919621	0.5	12	4.544056907
13093	0.07	1100	3.529137707	0.541666667	13	4.557302854
13106	0.11	900	5.540286892	0.583333333	14	4.566761473
13114	0.1	1000	5.033551929	0.625	15	4.570977918
13369	0.06	1000	2.962525245	0.666666667	16	5.033551929
13421	0.04	800	1.967364578	0.708333333	17	5.540286892
13422	0.06	1000	2.950827	0.75	18	5.562782502
13458	0.06	1000	2.942933571	0.791666667	19	5.573029396
13477	0.05	1200	2.448987163	0.833333333	20	5.576025188
13480	0.06	1000	2.938130564	0.875	21	5.586320972
13489	0.05	1200	2.446808511	0.916666667	22	5.587180671
13499	0.05	1100	2.444995926	0.958333333	23	6.125744335
13519	0.05	1300	2.4413788	1	24	9.148995149

6.125744335 23 0.9583333  
9.148995149 24 1

**97.5th Percentile 7.3350447**

Graph Title Polk 1: 97.5th Percentile = 7.3350 lb Hg/TBtu

**Polk 1: 97.5th Percentile = 7.3350 lb Hg/TBtu**





Wabash 1+1a  
ALPHA 0

BETA  
0.6747

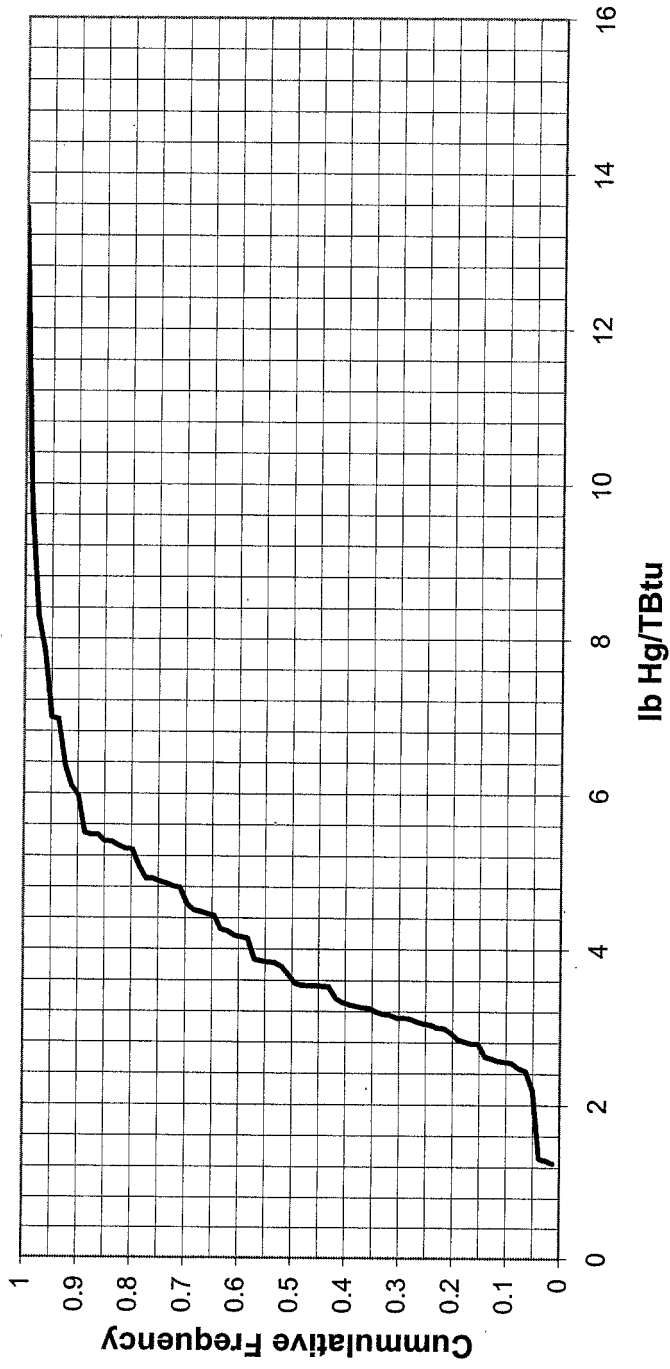
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79 0.897342

97.5th Percentile 5.3919547

Graph Title Wabash 1+1a 97.5th Percentile = 5.3920 lb Hg/TBU

H (lb/TBU)	BETA ALPHA 0	BETA 0.6747	Hg(ppm)	Cl(ppm)	lb Hg/TBU	Cumulative Frequency	Index	Sorted lb Hg/TBU
11539	0.084	0.084	317	4.911586783	0.012658228	0.012658228	1	1.254563932
11539	0.084	0.084	317	4.911586783	0.025316456	0.025316456	2	1.292322426
11594	0.094	0.094	358	5.470226379	0.037974694	0.037974694	3	1.317256883
11594	0.094	0.094	358	5.470226379	0.050632911	0.050632911	4	2.200278525
12276	0.111	0.111	666.7	6.100698824	0.063291139	0.063291139	5	2.437612422
12276	0.111	0.111	666.7	6.100698824	0.075949367	0.075949367	6	2.475396551
12276	0.098	0.098	531.2	5.986168133	0.088607585	0.088607585	7	2.540246294
12276	0.097	0.097	623.7	5.331207234	0.101265623	0.101265623	8	2.553707709
12276	0.116	0.116	697.6	6.375464321	0.113924051	0.113924051	9	2.584819127
12374	0.076	0.076	520.5	4.143949566	0.125822278	0.125822278	10	2.599166708
12442	0.071	0.071	482.2	3.850160746	0.136240506	0.136240506	11	2.622434701
12451	0.065	0.065	343.7	3.622247209	0.151698734	0.151698734	12	2.789233918
12505	0.071	0.071	480.1	3.830763985	0.164599862	0.164599862	13	2.789233918
12500	0.024	0.024	442.2	1.292322426	0.177215119	0.177215119	14	2.812552107
12500	0.058	0.058	374.7	3.110135456	0.189739416	0.189739416	15	2.812552107
12573	0.083	0.083	416.3	4.506819873	0.202263653	0.202263653	16	2.857576956
12573	0.084	0.084	418.3	4.596887288	0.215189873	0.215189873	17	2.857576956
12580	0.079	0.079	548.5	4.236937281	0.227848101	0.227848101	18	2.900186915
12598	0.078	0.078	481.9	4.177377391	0.240506329	0.240506329	19	3.027801578
12660	0.078	0.078	532.5	4.156918431	0.253164557	0.253164557	20	3.043917237
12662	0.068	0.068	480.4	4.262833076	0.265822785	0.265822785	21	3.067527163
12662	0.068	0.068	480.4	4.262833076	0.278481013	0.278481013	22	3.105069804
12666	0.091	0.091	345.3	3.196872779	0.291139241	0.291139241	23	3.117837338
12718	0.084	0.084	492	4.847441971	0.303797468	0.303797468	24	3.119135458
12749	0.048	0.048	472	4.459266709	0.316455666	0.316455666	25	3.157722309
12762	0.084	0.084	522.9	4.433953968	0.329113924	0.329113924	26	3.166904011
12785	0.067	0.067	389	3.5957783	0.341772152	0.341772152	27	3.196872779
12791	0.062	0.062	325	3.270376608	0.354430338	0.354430338	28	3.242988551
12796	0.132	0.132	426.5	6.890101678	0.367088608	0.367088608	29	3.247894844
12796	0.057	0.057	338	3.830763985	0.379746955	0.379746955	30	3.247894844
12806	0.067	0.067	389	3.5957783	0.392405331	0.392405331	31	3.291844201
12806	0.087	0.087	460	4.631832813	0.405063559	0.405063559	32	3.318281718
12805	0.025	0.025	318.9	1.317256883	0.417721519	0.417721519	33	3.369762677
12816	0.087	0.087	478.8	4.890126404	0.430379757	0.430379757	34	3.522247209
12818	0.064	0.064	406	3.889762677	0.443037975	0.443037975	35	3.522247209
12820	0.06	0.06	692	3.157722309	0.455696203	0.455696203	36	3.531632813
12820	0.059	0.059	482	3.105039364	0.468354443	0.468354443	37	3.532184716
12823	0.054	0.054	365	2.841285181	0.481012658	0.481012658	38	3.532184716
12825	0.053	0.053	591	2.788233918	0.493670668	0.493670668	39	3.5357763
12825	0.024	0.024	252	2.789233918	0.506329114	0.506329114	40	3.552620059
12830	0.067	0.067	745	3.523734903	0.518997342	0.518997342	41	3.678939237
12833	0.186	0.186	322	3.778022632	0.53166557	0.53166557	42	3.780847471
12833	0.057	0.057	380	3.896869915	0.544330338	0.544330338	43	3.800763985
12835	0.077	0.077	427	4.282833076	0.556988565	0.556988565	44	3.800763985
12856	0.058	0.058	400.9	3.830763985	0.569646793	0.569646793	45	3.850169127
12856	0.058	0.058	352	3.043917237	0.582305023	0.582305023	46	3.86887253
12894	0.05	0.05	394	3.622434701	0.594963769	0.594963769	47	4.143949566
12878	0.062	0.062	259	2.246789444	0.607622015	0.607622015	48	4.156918431
12879	0.042	0.042	632	2.200278525	0.620280261	0.620280261	49	4.177377881
12889	0.062	0.062	313	3.242695581	0.632938507	0.632938507	50	4.23687281
12902	0.057	0.057	487	2.800770423	0.645596753	0.645596753	51	4.252833878
12903	0.064	0.064	499	1.254963962	0.658254999	0.658254999	52	4.433953988
12905	0.074	0.074	474	3.66897253	0.670913245	0.670913245	53	4.456266709
12910	0.103	0.103	461.7	5.302968662	0.683571491	0.683571491	54	4.483983389
12912	0.063	0.063	494	3.29184201	0.696229737	0.696229737	55	4.505997388
12914	0.096	0.096	382	2.937549885	0.708888073	0.708888073	56	4.580125404
12924	0.058	0.058	507	3.552701758	0.721546319	0.721546319	57	4.606043985
12924	0.058	0.058	507	3.552701758	0.734204565	0.734204565	58	4.847441971
12964	0.054	0.054	272	2.812552107	0.746862811	0.746862811	59	4.847441971
12977	0.059	0.059	712	3.087827163	0.759521057	0.759521057	60	4.874564278
12979	0.05	0.05	399	2.599187006	0.772179303	0.772179303	61	4.911586783
12984	0.06	0.06	408	3.117837338	0.784837549	0.784837549	62	4.911586783
13001	0.108	0.108	418.1	5.900976848	0.797495795	0.797495795	63	5.06758017
13009	0.047	0.047	743	2.437812422	0.810154041	0.810154041	64	5.280216721
13013	0.064	0.064	532.6	3.312917118	0.822812287	0.822812287	65	5.294385119
13019	0.18	0.18	280	8.291861087	0.835470633	0.835470633	66	5.331207234
13027	0.073	0.073	232	3.780847471	0.848128879	0.848128879	67	5.382668692
13083	0.048	0.048	578	2.475396551	0.860787125	0.860787125	68	5.382668692
13100	0.152	0.152	313	7.829580153	0.873445371	0.873445371	69	5.468168133
13128	0.103	0.103	188	5.294385119	0.886103617	0.886103617	70	5.470225979
13164	0.105	0.105	195	5.294385119	0.898761863	0.898761863	71	5.000768648
13164	0.058	0.058	507	3.552701758	0.911420109	0.911420109	72	6.103869834
13241	0.084	0.084	387	4.596887288	0.924078355	0.924078355	73	6.375464321
13247	0.07	0.07	281.7	4.789803985	0.936736601	0.936736601	74	6.900187558
13247	0.104	0.104	755	3.655260059	0.949394848	0.949394848	75	6.960334213
13269	0.01	0.01	759	5.290216721	0.962053094	0.962053094	76	7.825580153
13314	0.089	0.089	351	5.05758017	0.974711340	0.974711340	77	8.231891087
13392	0.097	0.097	291	4.485893369	0.987369585	0.987369585	78	8.231891087
13426	0.037	0.037	306	4.87584278	0.999999931	0.999999931	79	9.77802852
13471	0.095	0.095	253	4.809195383	1.012658228	1.012658228	80	13.55094561

Wabash 1+1a: 97.5th Percentile = 5.3920 lb Hg/TBtu



**Fabric Filter (Baghouse) with Spray Dryer Absorber**

Plant	Unit	Tested Coal	Cl (ppm) "X <sub>i</sub> "	F <sub>removed</sub> (Control)	-LN(1-F <sub>removed</sub> ) "Y <sub>i</sub> "	X <sub>i</sub> <sup>2</sup>	X <sub>i</sub> Y <sub>i</sub>	F <sub>removed</sub> from 2 Parameter Fit	Calculated F <sub>removed</sub> from 2 Parameter Fit	(F <sub>Cal.</sub> -F <sub>Mea.</sub> ) <sup>2</sup>
Stanton Station	10	Lignite	28.3333	0.0147	0.014809116	802.7777778	0.41959161	0.229881023	0.046302873	
Coyote	1	Lignite	100	0.3824	0.48191428	10000	48.191428	0.34051589	0.001754279	
Sherburne County Generating Plant	#3	Subbituminous	102	0.0446	0.045625178	10404	4.65376816	0.343363978	0.089259915	
Antelope Valley Station	B1	Lignite	107	0.3333	0.405415109	11449	43.3794167	0.350430502	0.000293454	
Craig	C3	Subbituminous	116.6667	0.336	0.40947313	13611.11111	47.7718651	0.363877534	0.000777157	
Rawhide	101	Subbituminous	126.6667	0.3183	0.383165601	16044.44444	48.5343094	0.377495389	0.003504094	
SEI - Birchwood Power Facility	1	Bituminous	917.3333	0.9736	3.634391269	841500.4444	3333.94826	0.887523631	0.007409141	
Logan Generating Plant	GEN 1	Bituminous	1500	0.9752	3.696911626	2250000	5545.36744	0.968124151	5.00676E-05	
Dwayne Collier Battle Cogeneration Facility	2B	Bituminous	1700	0.9366	2.758291418	2890000	4689.09541	0.979322476	0.00182521	
Mecklenburg Cogeneration Facility	GEN 1	Bituminous	1892.667	0.9881	4.431216879	3582187.111	8386.81648	0.986372152	2.98546E-06	

**Fabric Filter (Baghouse) with Spray Dryer Absorber - Bituminous only**

Plant	Unit	Tested Coal	Cl (ppm) "X <sub>i</sub> "	F <sub>removed</sub> (Control)	-LN(1-F <sub>removed</sub> ) "Y <sub>i</sub> "	X <sub>i</sub> <sup>2</sup>	X <sub>i</sub> Y <sub>i</sub>	F <sub>removed</sub> from 2 Parameter Fit	Calculated F <sub>removed</sub> from 2 Parameter Fit	(F <sub>Cal.</sub> -F <sub>Mea.</sub> ) <sup>2</sup>
SEI - Birchwood Power Facility	1	Bituminous	917.3333	0.9736	3.634391269	841500.4444	3333.94826	0.887523631	0.007409141	
Logan Generating Plant	GEN 1	Bituminous	1500	0.9752	3.696911626	2250000	5545.36744	0.968124151	5.00676E-05	
Dwayne Collier Battle Cogeneration Facility	2B	Bituminous	1700	0.9366	2.758291418	2890000	4689.09541	0.979322476	0.00182521	
Mecklenburg Cogeneration Facility	GEN 1	Bituminous	1892.667	0.9881	4.431216879	3582187.111	8386.81648	0.986372152	2.98546E-06	

**Fabric Filter (Baghouse) with Spray Dryer Absorber - Bituminous only - Top 12% only**

Plant	Unit	Tested Coal	Cl (ppm) "X <sub>i</sub> "	F <sub>removed</sub> (Control)	-LN(1-F <sub>removed</sub> ) "Y <sub>i</sub> "	X <sub>i</sub> <sup>2</sup>	X <sub>i</sub> Y <sub>i</sub>	F <sub>removed</sub> from 2 Parameter Fit	Calculated F <sub>removed</sub> from 2 Parameter Fit	(F <sub>Cal.</sub> -F <sub>Mea.</sub> ) <sup>2</sup>
SEI - Birchwood Power Facility	1	Bituminous	917.3333	0.9736	3.634391269	841500.4444	3333.94826	0.887523631	0.007409141	
Dwayne Collier Battle Cogeneration Facility	2B	Bituminous	1700	0.9366	2.758291418	2890000	4689.09541	0.979322476	0.00182521	
Mecklenburg Cogeneration Facility	GEN 1	Bituminous	1892.667	0.9881	4.431216879	3582187.111	8386.81648	0.986372152	2.98546E-06	

**A="ALPHA"**  
**B**  
 Minimum Removal  
 EXP(-B)="BETA"  
 Residual Variance  
 Total Variance  
 Residual/Total  
 R  
 R\*\*2

Removal/CI Curve  
 CI (ppm)  $F_{remove}$

0.002164007	0	0.181184701
0.19989674	5	0.189996551
0.181184701	10	0.198713571
0.818815299	15	0.207336781
0.018897397	20	0.21586719
0.157137686	25	0.224305797
0.12026012	30	0.232653591
0.966795037	35	0.240911548
0.934692644	40	0.249080636
	45	0.25716181

**A="ALPHA"**  
**B**  
 Minimum Removal  
 EXP(-B)="BETA"  
 Residual Variance  
 Total Variance  
 Residual/Total  
 R  
 R\*\*2

Removal/CI Curve  
 CI (ppm)  $F_{remove}$

0.000258045	0	0.181184701
3.242490702	5	0.189996551
0.960933529	10	0.198713571
0.039066471	15	0.207336781
0.004643702	20	0.21586719
0.000490869	25	0.224305797
9.460162688	30	0.232653591
-0.136906342	35	0.240911548
0.018743346	40	0.249080636
	45	0.25716181

**A="ALPHA"**  
**B**  
 Minimum Removal  
 EXP(-B)="BETA"  
 Residual Variance

0.000258465	50	0.265156017
3.219406923	55	0.273064193
0.960021238	60	0.280887263
0.039978762	65	0.288626144
0.004618668	70	0.296281741
	75	0.30385495

Total Variance 0.00070525  
Residual/Total 6.548980301  
R -0.182104685  
R\*\*2 0.033162116

80	0.311346659
85	0.318757745
90	0.326089074
95	0.333341506
100	0.34051589
105	0.347613065
110	0.354633862
115	0.361579103
120	0.368449602
125	0.375246162
130	0.38196958
135	0.388620642
140	0.395200128
145	0.401708807
150	0.408147441
155	0.414516785
160	0.420817584
165	0.427050575
170	0.433216489
175	0.439316047
180	0.445349964
185	0.451318945
190	0.45722369
195	0.463064889
200	0.468843228
205	0.474559381
210	0.480214019
215	0.485807804
220	0.491341389
225	0.496815424
230	0.502230549
235	0.507587398
240	0.512886598
245	0.51812877
250	0.523314527
255	0.528444477
260	0.533519219
265	0.538539348
270	0.543505453
275	0.548418113
280	0.553277905
285	0.558085398

290	0.562841153
295	0.567545729
300	0.572199675
305	0.576803536
310	0.581357853
315	0.585863157
320	0.590319976
325	0.594728833
330	0.599090242
335	0.603404716
340	0.607672758
345	0.611894869
350	0.616071542
355	0.620203268
360	0.624290529
365	0.628333804
370	0.632333567
375	0.636290286
380	0.640204423
385	0.644076438
390	0.647906783
395	0.651695907
400	0.655444253
405	0.659152261
410	0.662820365
415	0.666448993
420	0.670038571
425	0.67358952
430	0.677102254
435	0.680577185
440	0.684014719
445	0.68741526
450	0.690779206
455	0.694106949
460	0.697398881
465	0.700655385
470	0.703876844
475	0.707063635
480	0.71021613
485	0.713334699
490	0.716419707
495	0.719471515

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0.816044482  
0.818024157  
0.819982528  
0.821919823

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715	0.825732092
720	0.827607512
725	0.82946275
730	0.831298022
735	0.833113543
740	0.834909526
745	0.836686181
750	0.838443717
755	0.840182338
760	0.841902249
765	0.843603651
770	0.845286742
775	0.846951721
780	0.848598782
785	0.850228117
790	0.851839919
795	0.853434374
800	0.85501167
805	0.856571992
810	0.858115522
815	0.859642442
820	0.861152929
825	0.86264716
830	0.864125311
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840	0.867034062
845	0.868465002
850	0.869880544
855	0.871280851
860	0.872666089
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870	0.875392002
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880	0.87805956
885	0.879371848
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900	0.883224581
905	0.884481284
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945	0.894060064
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980	0.901787641
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990	0.903890132
995	0.904924438
1000	0.905947613
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1035	0.912808077
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1045	0.914674647
1050	0.915592893
1055	0.916501258
1060	0.917399847
1065	0.918288765
1070	0.919168118
1075	0.920038007
1080	0.920898534
1085	0.921749801
1090	0.922591907
1095	0.92342495
1100	0.924249028
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1110	0.925870675
1115	0.926668433
1120	0.927457606
1125	0.928238286

1130	0.929010564
1135	0.929774532
1140	0.930530278
1145	0.93127789
1150	0.932017458
1155	0.932749066
1160	0.933472801
1165	0.934188747
1170	0.934896988
1175	0.935597608
1180	0.936290688
1185	0.936976309
1190	0.937654551
1195	0.938325494
1200	0.938989217
1205	0.939645798
1210	0.940295312
1215	0.940937836
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1225	0.942202215
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1245	0.944650351
1250	0.945246008
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1260	0.946418159
1265	0.946994791
1270	0.947565218
1275	0.948129506
1280	0.948687721
1285	0.949239929
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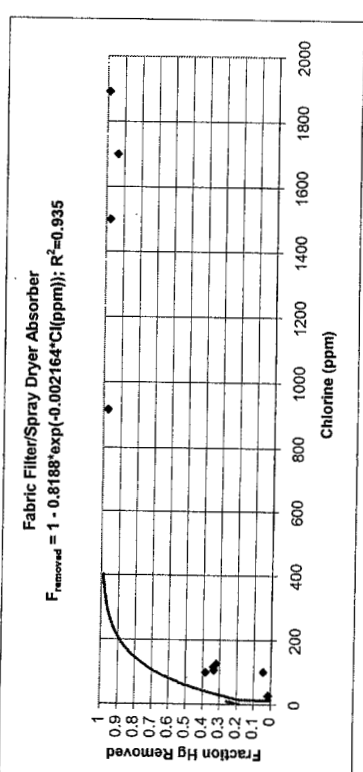
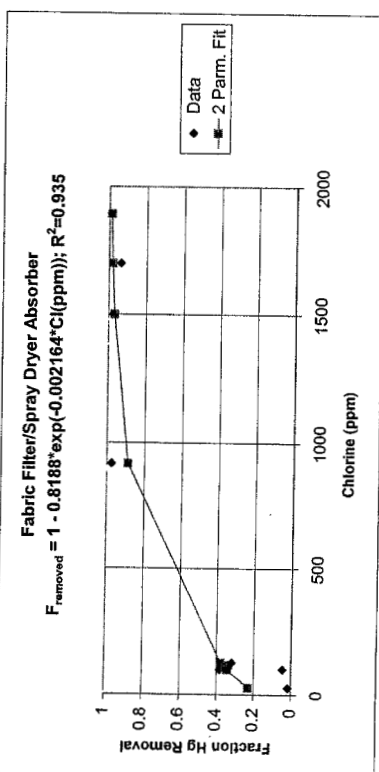
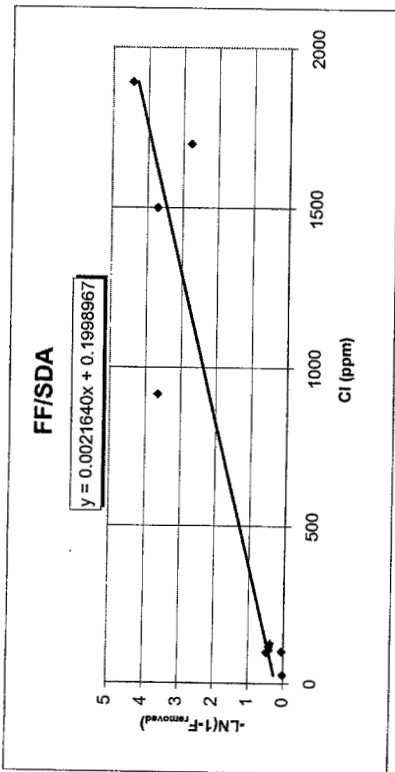
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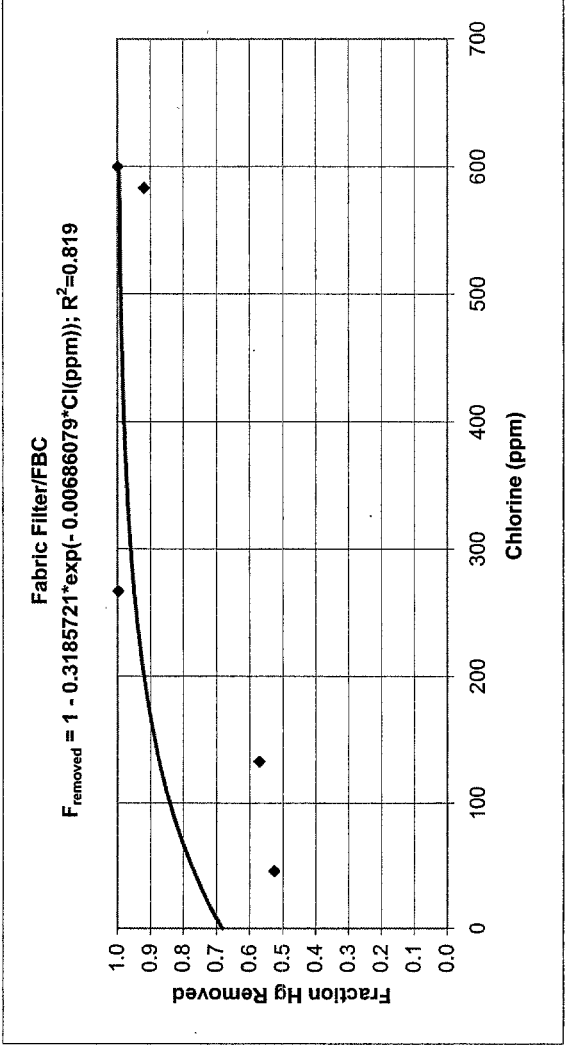
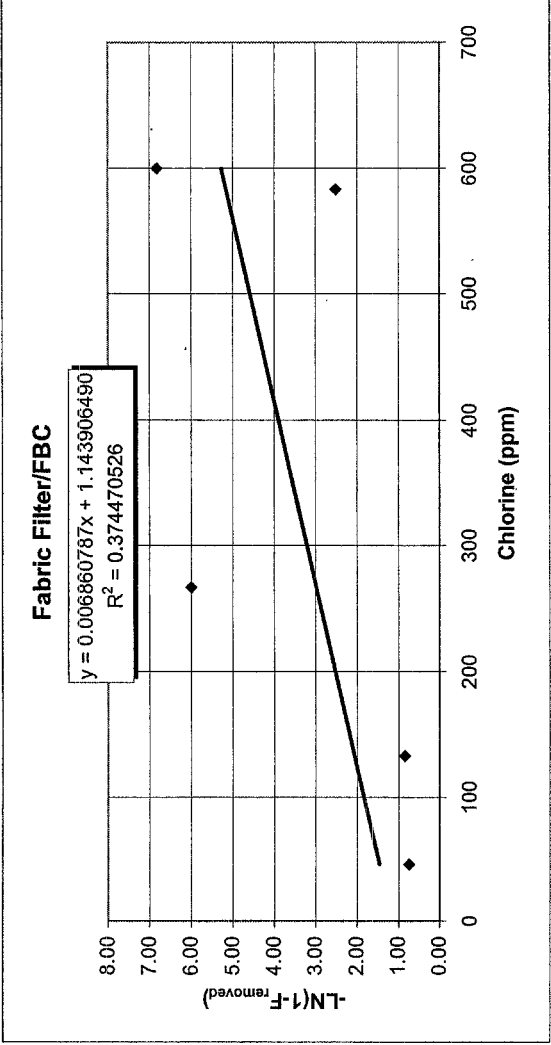


### Fabric Filter (Baghouse) with Fluidized Bed Combustion

Plant name	Unit name	Tested Coal	Cl in test coal (ppm) = "X <sub>i</sub> "	X <sub>i</sub> <sup>2</sup>	F <sub>remove</sub> (Control)	-LN(1-F <sub>remove</sub> ) = "Y <sub>i</sub> "	X <sub>i</sub> Y <sub>i</sub>	Calculated F <sub>r</sub> from 2 Parameter Fit	(F <sub>r,meas.</sub> -F <sub>r,calc.</sub> ) <sup>2</sup>
AES Hawaii, Inc.	A	Subbituminous	45.66666667	2085.444444	0.5252	0.744861616	34.01534714	0.767116223	0.058523459
TNP-One	U2	Lignite	133.3333333	17777.77778	0.5698	0.843505062	112.4673416	0.872377435	0.091553104
Kline Township Cogen Facility	GEN1	Waste Bituminous	266.6666667	71111.11111	0.9975	5.991464547	1597.723879	0.948873364	0.002364455
Stockton Cogen Company	GEN1	Bituminous/Petroleum Coke	583.3333333	340277.7778	0.9182	2.503478035	1460.362187	0.994177539	0.005772586
Scrubgrass Generating Company L. P.	GEN1	Waste Bituminous	600	360000	0.9989	6.812445099	4087.46706	0.994806662	1.67554E-05

Xbar	325.8	Removal/CI Curve	
Ybar	3.379150872	CI (ppm)	F <sub>removal</sub>
SUMk <sup>2</sup>	791252.1111	0	0.681427911
SUMky	7292.035815	10	0.702551554
N	5	20	0.722274546
A	0.006860787	30	0.74068976
B	1.14390649	40	0.757683912
"ALPHA"	0.006860787	50	0.773937967
"BETA"	0.318572089	60	0.788927522
Minimum Removal	0.681427911	70	0.80292316
Total Variance	0.052566837	80	0.815990786
Residual Variance	0.952743485	90	0.828191933
Residual/Total	0.964515091	100	0.839684055
R	0.905084345	110	0.850220797
R <sup>2</sup>	0.819177671	120	0.860152246
		130	0.869425168
		140	0.878083228
		150	0.886167195
		160	0.893715137
		170	0.900762595
		180	0.907342756
		190	0.913486604
		200	0.919222307
		210	0.924579167
		220	0.929580116
		230	0.934249466
		240	0.938609204
		250	0.942679859
		260	0.946480601
		270	0.950029326
		280	0.953342744
		290	0.956436459
		300	0.959325038
		310	0.962022084
		320	0.964540295
		330	0.966891531
		340	0.969086863
		350	0.971138629
		360	0.97305048
		370	0.974837429
		380	0.97650589
		390	0.97806372
		400	0.979518255
		410	0.980875343
		420	0.98214438
		430	0.983328338
		440	0.98443379
		450	0.985465943
		460	0.986429656
		470	0.987329469
		480	0.988169617
		490	0.988954057
		500	0.989686483
		510	0.990370344
		520	0.991008861
		530	0.991605038
		540	0.992161685
		550	0.992681423
		560	0.993166697
		570	0.993619795
		580	0.994042849
		590	0.994437851
		600	0.994806862





Attachment

The attachment to this memo is contained in Docket A-92-55, Entry II-E-119, and is entitled:

Multivariable Method To Estimate The Mercury Emissions Of The Best-Performing Coal-Fired Utility Units Under The Most Adverse Circumstances Which Can Reasonably Be Expected To Recur. WEST Associates, Tucson, Arizona. March 4, 2003.