

March 13, 2009

Mr. Chris Kjellmark  
Iowa Department of Natural Resources  
Air Quality Bureau – Operating Permits  
7900 Hickman Road, Suite 1  
Urbandale, IA 50322

RE: Petition for Nitrogen Oxide (NOx) Allowances from Iowa's Compliance Supplement Pool for CIPCO, Fair Station Facility

Dear Mr. Kjellmark:

Attached please find copies of the 2007 and 2008 continuous emission monitoring (CEM) management reports for CIPCO – Fair Station. These documents are being provided in our effort to justify our request for 158 nitrogen oxide (NOx) allowances among those available in Iowa's Compliance Supplement Pool. The reduction in emissions is evident in the following table:

Year	Annual Heat Input <i>mmBTU</i>	Annual Avg NOx Rate <i>lb NOx/mmBTU</i>	Permitted Rate <i>lb NOx/mmBTU</i>	Annual NOx Mass <i>tons NOx</i>	Permitted Tons <i>tons NOx</i>	Difference <i>tons NOx</i>
2007	2,672,152	0.407	0.460	544	615	71
2008	2,147,101	0.379	0.460	407	494	87
					Total Overcontrol	158

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Emission Summation and Averages

	Emission Summation and Averages			Quarter Totals	Year
	October	November	December		
S02 Tons	233.261	209.699	70.077	513.037	2519.439
<del>Average NOx #/mmBtu</del>	<del>0.396</del>	<del>0.381</del>	<del>0.380</del>	<del>0.388</del>	<del>0.407</del>
CO2 Tons	26842.500	25813.800	7722.000	60378.300	274162.812
<del>Total Heat Input</del>	<del>261628.500</del>	<del>251600.900</del>	<del>75274.125</del>	<del>588503.525</del>	<del>2672152.000</del>
Total Load	23100.000	21562.000	6214.000	50876.000	223877.000
Total Operation Hour	744.000	720.000	219.767	1683.767	7569.983

System Availability  
 ( Period Ending )

	Previous Quarter			Missing Data Totals		
	October	November	December	October	November	December
S02 System	99.475	99.475	99.395			
NOx System	99.920	99.920	99.840			
Flow System	98.459	98.459	98.459			
CO2 Monitor	99.954	99.954	99.874			
NOx Monitor	99.932	99.932	99.852			

	October		November		December		Quarter Totals	
	Number of Occurrences	Number of Hours	Number of Occurrences	Number of Hours	Number of Occurrences	Number of Hours	Number of Occurrences	Number of Hours
S02 Monitor	0	0	2	7	1	1	3	8
NOx Monitor	0	0	2	7	2	5	4	12
Flow Monitor	0	0	0	0	1	1	1	1
CO2 Monitor	0	0	2	7	2	5	4	12
Total	0	0	6	21	6	12	12	33

Facility Name: FAIR STATION  
 CEM Management Report  
 Reporting Period: 10/01/2008 to 12/31/2008  
 Site: U2 Time of Report: 01/29/09 23:00

Emission Summation and Averages

	October	November	December	Quarter Totals	Year
S02 Tons	175.236	207.999	268.778	652.014	1958.528
Average NOx / Month	0.377	0.389	0.374	0.380	0.379
CO2 Tons	19114.671	22271.149	28820.700	70206.520	220291.125
Total Heat Input	186306.750	217069.504	280916.600	684292.854	214701.000
Total Load	14914.000	17562.000	21874.000	54350.000	180216.000
Total Operation Hour	516.133	624.383	744.000	1884.517	6406.717

System Availability  
 ( Period Ending )

	Previous Quarter	October	November	Quarter Ending
S02 System	99.326	99.178	98.961	98.961
NOx System	99.692	99.612	99.600	99.600
Flow System	98.185	98.185	98.185	98.505
CO2 Monitor	99.703	99.623	99.612	99.612
NOx Monitor	99.692	99.612	99.600	99.600

Missing Data Totals

	October Number of Occurrences	October Number of Hours	November Number of Occurrences	November Number of Hours	December Number of Occurrences	December Number of Hours	Quarter Totals Number of Occurrences	Quarter Totals Number of Hours
S02 Monitor	1	13	3	19	0	0	4	32
NOx Monitor	2	7	1	1	0	0	3	8
Flow Monitor	0	0	0	0	0	0	0	0
CO2 Monitor	2	7	1	1	0	0	3	8
Total	5	27	5	21	0	0	10	48