

April 24, 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 (NO_x) Allowances from Iowa's Compliance Supplement Pool for CIPCO, Fair Station Facility

Dear Mr. Kjellmark:

Please disregard the previous petition for NO_x allowances presented in our letter to you dated March 13, 2009. Since that correspondence, CIPCO has received additional information to more accurately determine and request the appropriate number of allowances considering the installation of low NO_x burners on Fair Station Unit 2 in 1998.

For the purpose of determining our compliance supplement pool (CSP) allocation, the CAIR Compliance Supplement Pool Update and Example Calculations (March 26, 2009) guidance document, provided by your department, was used. As a result, please consider the following:

1995 NO_x annual emission rate = 0.95 lbs/MMBtu

1996 NO_x annual emission rate = 0.97 lbs/MMBtu

Two year baseline average = $(0.95 \text{ lbs/MMBtu} + 0.97 \text{ lbs/MMBtu})/2 = 0.96 \text{ lbs/MMBtu}$

2007 annual heat input = 2672152 MMBtu

2007 NO_x annual emission rate = 0.407 lbs/MMBtu

2008 annual heat input = 2147101 MMBtu

2008 NO_x annual emission rate = 0.379 lbs/MMBtu

Projected baseline emissions for 2007 and 2008

2007 projected NO_x emissions = $(2672152 \text{ MMBtu/yr} * 0.96 \text{ lbs/MMBtu})/2000 \text{ lb/ton} =$
1,282.6 ton/yr

2008 projected NO_x emissions = $(2147101 \text{ MMBtu/yr} * 0.96 \text{ lbs/MMBtu})/2000 \text{ lb/ton} =$
1,030.6 ton/yr

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APR 29 2009

Facility Name: FAIR STATION
 CEM Management Report
 Reporting Period: 10/01/2007 to 12/31/2007
 Site: U2 Time of Report: 01/29/08 10:46

Emission Summation and Averages

	October	November	December	Quarter Totals	Year
SO2 Tons	233.261	209.699	70.077	513.037	2519.439
Average NOx #/mmBtu	0.396	0.381	0.380	0.388	0.407
CO2 Tons	26842.500	25813.800	7722.000	60378.300	274162.812
Total Heat Input	261628.500	251600.900	75274.125	588503.525	2672152.000
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	October	November	Quarter Ending
SO2 System	99.475	99.475	99.395	99.384
NOx System	99.920	99.920	99.840	99.783
Flow System	98.459	98.459	98.459	98.447
CO2 Monitor	99.954	99.954	99.874	99.817
NOx Monitor	99.932	99.932	99.852	99.795

Missing Data Totals

	October	November	December	Quarter Totals
	Number of Occurrences	Number of Occurrences	Number of Occurrences	Number of Occurrences
SO2 Monitor	0	2	1	3
NOx Monitor	0	2	2	4
Flow Monitor	0	0	1	1
CO2 Monitor	0	2	2	4
Total	0	6	6	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
SO2 Tons	175.236	207.999	268.778	652.014	1958.528
Average NOx #/mmBtu	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	2147101.000
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
SO2 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	November	December	Quarter Totals
	Number of Occurrences	Number of Occurrences	Number of Occurrences	Number of Occurrences
SO2 Monitor	1	3	0	4
NOx Monitor	2	1	0	3
Flow Monitor	0	0	0	0
CO2 Monitor	2	1	0	3
Total	5	5	0	10



Unit Level Emissions Quick Report

April 27, 2009

Your query will return data for 1 facilities and 1 units.

You specified: Year(s): 1995 Program(s): ARP Facility: Fair Station

State	Facility Name	Facility ID (ORISPL)	Unit ID	Associated Stacks	Year	Program (s)	Operating Time	# of Months Reported	SO ₂ Tons	Avg. NO _x Rate (lb/mmBtu)	NO _x Tons	CO ₂ Tons	Heat Input (mmBtu)
IA	Fair Station	1218	2		1995	ARP		0	4,997.0	0.95	936.0	204,279.0	1,927,942
Total									4,997.0		936.0	204,279.0	1,927,942



Unit Level Emissions Quick Report

April 27, 2009

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State	Facility Name	Facility ID (ORISPL)	Unit ID	Associated Stacks	Year	Program (s)	Operating Time	# of Months Reported	SO ₂ Tons	Avg. NO _x Rate (lb/mmBtu)	NO _x Tons	CO ₂ Tons	Heat Input (mmBtu)
IA	Fair Station	1218	2		1996	ARP		0	5,046.1	0.97	1,064.0	217,098.0	2,123,248
Total									5,046.1		1,064.0	217,098.0	2,123,248