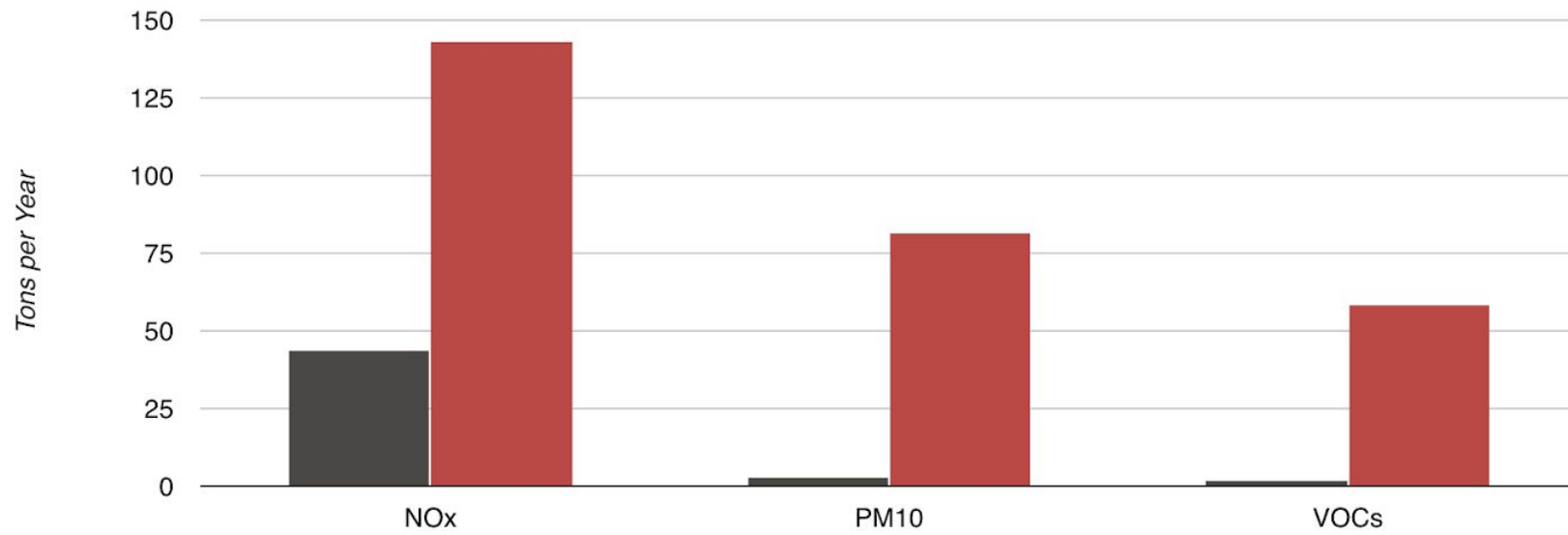


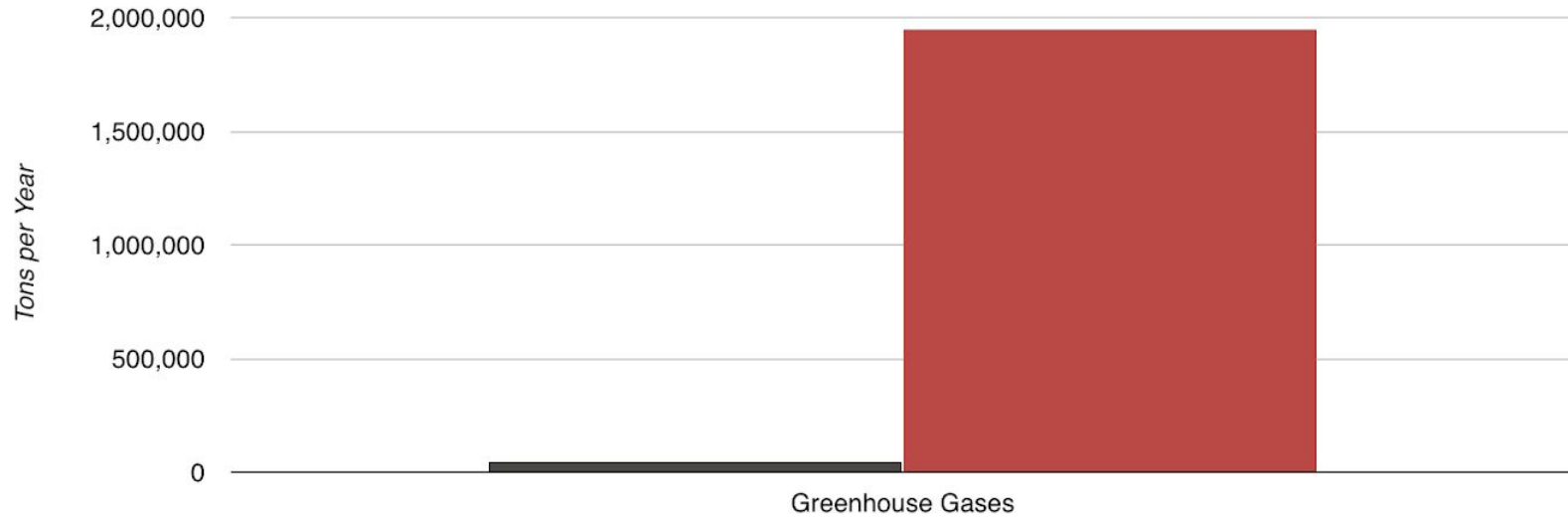
POLLUTANTS

Actual Emissions from Current Plant vs Projected Emissions from New Plant



GREENHOUSE GASES

Actual Emissions from Current Plant vs Projected Emissions from New Plant



Danskammer Application Data on Emissions Increases from Proposed Plant

The below table appears in Exhibit 17 of Danskammer’s Article 10 application. This depicts the results of the “netting analysis” required by the Clean Air Act in order to determine whether there will be a “significant increase” in pollutants that triggers more stringent pollution control requirements. The “Baseline Actual Emissions” represent the **actual annual emissions** from the existing plant averaged over a 2-year period within the past 5 years (in this case, actual annual emissions averaged between Dec. 2014 and Nov. 2016). “Project Emission Potential” represents the **new plant’s expected annual emissions** based on projected operation. The highlighted column, “Project Net Emissions Increase”, calculates the anticipated increase in annual emissions of pollutants once the new Danskammer plant is online. It is important to note that for most if not all of these pollutants, those living nearby to the facility will be by far the most impacted by the increase.

Table 17-4. PSD/NNSR Netting Analysis

Pollutant	Baseline Period ¹	Baseline Actual Emissions (BAE) (ERC) ² tons/yr	Project Emission Potential ³ NSR Step 1 (PEP) tons/yr	Contemporaneous ⁴ Emission Increases tons/yr	Project Net Emission Increase NSR Step 2 (PEP - ERC) ⁵ tons/yr	PSD/NNSR Significant Net Emission Rate Thresholds ⁶ tons/yr	Subject to PSD/NNSR?
NO _x	December 2014 to November 2016	44.2	143.5	0.0	99.3	40	NNSR
CO	December 2014 to November 2016	9.2	115.6	0.0	106.4	100	PSD
SO ₂	December 2014 to November 2016	27.1	24.4	0.0	(2.6)	40	No
PM ₁₀	December 2014 to November 2016	2.9	81.5	0.0	78.6	15	PSD
PM _{2.5}	December 2014 to November 2016	2.9	81.5	0.0	78.6	10	PSD
VOC	December 2014 to November 2016	2.1	58.6	0.0	56.5	40	NNSR
H ₂ SO ₄	December 2014 to November 2016	2.1	22.1	0.0	20.0	7	PSD
GHG	December 2014 to November 2016	47,303.9	1,954,952	0.0	1,907,648.2	75,000	PSD

Notes:

- ¹ Per 6 NYCRR 231-4(b)(7), "baseline period" is defined for an ERC, which is scheduled to occur in the future, as any 24 consecutive months within the 5 years immediately preceding date of receipt by the department of the permit application, which proposes to use the ERC. (Submittal Date of December 2019).
- ² Per 6 NYCRR 231-10.2, ERCs are quantified as the difference between BAE and subsequent Potential to Emit (PTE). The existing units will be retired so the existing unit post Project PTE is zero.
 - a. Baseline actual emissions based upon EPA Clean Air Markets Data and NYSDEC Emission Statement Data.
 - b. Baseline emissions conservatively do not include existing auxiliary fuel-burning equipment that will be retired.
- ³ For new units, PEP is defined as potential to emit (see future operating assumptions below).
- ⁴ Per 6 NYCRR 231-4(b)(13), "contemporaneous" is defined as the period beginning 5 years prior to the scheduled commence construction date of the new or modified emission source and ending with the scheduled commence operation date.
- ⁵ The net emissions increase is defined under 6 NYCRR 231-4.1(b)(30) as the aggregate increase in emissions of a regulated NSR contaminant in tpy at an existing major facility resulting from the sum of:
 - a. the project emission potential of the modification (PEP);
 - b. every creditable emission increase at the facility, which is contemporaneous and for which an emission offset was not obtained; and (no creditable contemporary increases occurred);
 - c. any ERC at the facility, or portion thereof, selected by Danskammer which is contemporaneous, and which was not previously used as part of an emission offset, an internal offset, or relied upon in the issuance of a permit under this Part.