



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

April 24, 2008

Mr. Ronald Gore, Chief
Alabama Department of Environmental Management
1400 Coliseum Boulevard
Montgomery, AL 36110-2059

Dear Mr. Gore:

Thank you for the opportunity to review the pre-hearing of Alabama's Regional Haze State Implementation Plan dated March 7, 2008. Enclosed are our comments.

We appreciate your transmittal of this package for our consideration. If you have questions regarding this letter, please contact Stacy Harder of the Region 4 staff at (404) 562-9042.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard A. Schutt".

Richard A. Schutt
Chief
Air Planning Branch

Enclosure

Comments on the March 7, 2008, Alabama Regional Haze State Implementation Plan (SIP)

I. Key Comments:

The following comments must be addressed in the final SIP to meet the requirements of the regional haze regulations and/or SIP completeness and approvability criteria.

1. Best Available Retrofit Technology (BART) Emission Limits: The BART limits and associated compliance schedules are required to be in the SIP per 40 CFR 51.308(e): "*The State must submit an implementation plan containing emission limitations representing BART and schedules for compliance with BART . . .*". Attachment H5 of Appendix H provides permits stamped "draft" with no issuance date. In your final SIP, please include the final BART limits and supporting conditions, included the dates they were adopted by and effective in the State.
2. St. Marks Class I Area and Sanders Lead Company (SIP Narrative, page 79): The Sanders Lead facility was exempted from a four-factor reasonable progress analysis for the St. Marks Wilderness Class I because (1) BART screening modeling was less than 0.5 deciview (dv) and (2) the Florida Department of Environmental Protection did not request an analysis in their consultation process.
 - a. We recommend that the rationale or procedures Florida uses to exempt sources, particularly Sanders Lead, from a reasonable progress analysis be discussed in the SIP Narrative. This may be in the appendices but it should also be discussed in the SIP Narrative.
 - b. The Florida reasonable progress methodology to identify sources for a four-factor analysis involves assessing emission units having sulfur dioxides (SO₂) emissions of at least 250 tons per year, an emissions (Q) to distance (d) ratio of greater than or equal to 50 ($Q/d \geq 50$), and being within 300 km of the Class I area. EPA provided Florida comments on a draft of this procedure. It appears that the reasonable progress area of influence (AOI) process is simpler and different from that being used by the other Visibility Improvement –State and Tribal Association of the Southeast (VISTAS) states. A subsequent review of the Florida AOI process may require EPA to revisit the Sanders Lead exemption from further reasonable progress analysis.
 - c. We recommend that the State remove the part of the rationale related to Sanders Lead being exempt from BART. A facility exempt under BART is not automatically presumed exempt under reasonable progress. This also appears to be inconsistent with the reasonable progress screening methodology that either Alabama or Florida is using.

3. Breton Island Class I Area, Akzo Nobel Chemical Inc.
 - a. Enclosure 1 includes the facilities that have a greater than or equal to one percent impact at the Breton Island Class I area as presented in the March 3, 2008, Kentucky Regional Haze Prehearing SIP. It is our understanding that this table and similar tables for other Class I areas were developed through the VISTAS Regional Planning Organization (RPO). We recommend the Alabama SIP discuss why the Akzo Nobel Chemicals, Inc. (an Alabama facility) is omitted from Table 7.6-5 and a four-factor analysis.
 - b. Given Comment I.2.a. regarding Sanders Lead, please briefly explain how the procedure used to identify sources for a reasonable progress analysis by Louisiana for Breton Island compares with the Alabama AOI approach.
4. Escambia Operating Company - Big Escambia Creek (SIP Narrative, page 79): On page 79 of the SIP Narrative, Alabama states that this facility was exempted from the four-factor analysis because it was exempted from BART-subjectivity through a SO₂ permit emission limitation. If the source had undergone a BART determination for this pollutant and source, we would agree with the reasonable progress exemption. EPA's *Guidance for Setting Reasonable Progress Goals Under the Regional Haze Program*, pages 4-2 and 4-3 of Section 4, allows States the discretion to have a BART control analysis suffice for a reasonable progress control analysis in the first planning period: "*Note that for some sources determined to be subject to BART, the State will already have completed a BART analysis. Since the BART analysis is based, in part, on an assessment of many of the same factors that must be addressed in establishing the RPG, it is reasonable to conclude that any control requirements imposed in the BART determination also satisfy the RPG-related requirements for source review in the first RPG planning period...*" The Escambia unit has not completed a BART analysis and thus, the citation above does not apply. The four statutory reasonable progress factors must in some way be addressed to justify the basis for no further control for reasonable progress for this unit.

II. Recommended Changes:

The following comments should be addressed in the final SIP to clearly provide the State's methodology and rationale for the analyses and conclusions presented.

A. SIP Narrative – Main Report:

1. Section 2.1 and 2.3: Section 2.3 of the SIP Narrative references Appendix B for more information on how the new IMPROVE equation is used to estimate natural background. However, none of the documents in Appendix B discuss where the data (i.e., fine particulate matter (PM_{2.5}) species concentration data) used in the

new IMPROVE equation was obtained and how it was used in the equation for the Alabama Class I areas. Please clarify.

2. Section 4.1.6, Summary of Base G2 Baseline Emissions Inventory, Page 21:
The emissions inventory data in Table 4.1 for Point and Area sources do not agree with the data provided in Table 4 in Appendix D.3. Please Clarify.
3. Escambia Operating Company - Big Escambia Creek:
 - a. On page 79, the SIP states that a permit limitation of 5,200 tons of SO₂ was taken by this company to avoid BART subjectivity. Please clarify in the final SIP when this limit was established as an enforceable permit condition (similar to what was done in Table 7.8.3-1 on page 83).
 - b. On page 81, Big Escambia Creek is listed as a BART-eligible facility. Page 79 discusses how the source was exempted from BART-subjectivity. However, Section 7.8.3, "Sources that took Limits to be Exempt from BART" only lists those facilities that took emission limits to exempt units from BART-eligibility, not BART-subjectivity. To avoid confusion, please include a notation in Section 7.8.3 regarding Big Escambia Creek's BART exemption status.
4. St. Marks Class I area and Step 4 of the Reasonable Progress Assessment:
Enclosure 2, from the March 3, 2008, Kentucky prehearing SIP, shows a 2.3 percent visibility impact from the ExxonMobile Production Company at the St. Marks Class I area. We recommend that the State discuss the four-factor analysis for reasonable progress for this facility in this section. Also, clarify that ExxonMobile Production Company is the same as Escambia Operating Company - Big Escambia Creek.
5. Section 7.2.1 Federal and State Control Requirements: This section presents the names of headquarter facilities which have several plants subject to consent decrees and whose reductions were modeled in the 2018 inventory. We recommend that the dates for control implementation and compliance be provided for the individual plants. As presented this is not clear for the East Kentucky Power Cooperative, Santee Cooper (specific plants are also not listed), Virginia Electric and Power Company (specific plants are also not listed) and Cargill, Inc.
6. Section 7.8.3 Sources with Limits to be Exempt from BART:
 - a. The State must include all BART exemption emission limits in the SIP. Please include in the final SIP the relevant portions of the final permits where these limits are established. To prevent circumvention of the BART requirements, we recommend including a permit term or SIP provision that provides that any future changes at the BART-eligible source or in its permit that allow for increases in emissions would subject the source to BART review.

- b. Please clarify that the emission units presented in Table 7.8.3-1 are the only BART-eligible units at Gulf States Paper, Kerr McGee Chemical and Mobile Energy Services Co.
 - c. It is unclear how the removal of all potential emissions could occur through an emission limitations for the Gulf States Paper #2 Recovery Furnace unless the units were shut-down or some extremely efficient control was used. The SIP Narrative should discuss how this level of reductions was possible. Also, permits for this facility are not included in Attachment H5 -BART provisos.
 - d. It is unclear how to equate the maximum heat input to potential emissions for the Mobile Energy Services Company. Also, the SIP Narrative should clarify what visibility-impairing pollutant is involved. The potential emission limit changes should be provided to show how BART subjectivity was avoided.
7. Section 7.8.4: Figure 7.8.4-1 lists Oak Grove Resources as having an impact of 0.535 dv, which is greater than the 0.5 dv cutoff used for eligibility. This is repeated in Appendix H, Appendix H-8 and H-9. However, the modeling performed through VISTAS in Appendix H-7 (Table 4-4 on page 4-4) lists the impact as 0.021 dv, which is consistent with the claim that Oak Grove Resources is exempt. Please clarify and resolve the differences.
8. General: The State provided AOI data for Class I areas that indicated a one percent or greater impact from Alabama's sources. It appears that the Joyce Kilmer AOI data should also be included and show that the Tennessee Valley Authority's Widows Creek unit has a one percent or greater visibility impact. This data would only be added for completeness.

B. Appendices and Attachments:

- 1. Attachment H5 BART provisos:
 - a. The Escambia Operating Company - Big Escambia Creek major source operating permit excerpt provided in Attachment H5 does not appear to contain the emission limits used to exempt out of BART-subjectivity. Please verify if all intended information is contained in this excerpt.
 - b. Please clarify why permit information is included for the Rock-Tenn Mill Company, LLC.
- 2. Appendix I: Appendix I addresses the archival and access of BART modeling products developed through the VISTAS technical efforts. The appendix does not discuss how files created through source-specific BART exemption and determination modeling will be archived, maintained and made accessible to EPA and the public. Please address these items in the final SIP.

III. Suggested Clarifications:

The following comments are suggested clarifications that would be helpful to more clearly portray the information presented.

A. SIP Narrative – Main Report:

1. Federal Land Managers (FLMs) Consultation Procedures: Please clarify what the State’s procedures are for continuing consultation with the FLMs as required in 40 CFR 51.308(i)(4). Section 1.6 on page 7 introduces the requirement, and then provides a copy of the VISTAS Memorandum of Agreement and Bylaws. On page 99, it states, “ADEM also commits to ongoing consultation with the FLMs...” It is unclear if the VISTAS agreement or the referenced statement on page 99 is intended to fulfill this requirement.
2. Section 2.1, Page 9: For clarity, please provide a citation in section 2.1 and/or section 2.3 for the location of the 20 percent best and worst days used in the technical analyses for the Alabama Class I areas. This information appears to be provided in Section 3 of Appendix G. It would be helpful to add a reference to the SIP Narrative to the location of this information in Appendix G.
3. Section 2.4, Figures 2.4-1 and 2.4-2, Page 12: It appears that the labels for these figures are reversed. Figure 2.4-1 presents information for the 20 percent cleanest days, but the caption indicates it is for the 20 percent worst days and vice-versa for Figure 2.4-2.
4. Section 6.3, Page 38: The second sentence of this section indicates that Figure 6.3-1 presents information for the 20 percent best days and Figure 6.3-2 presents information for the 20 percent worst days. However, the figures appear to be reversed as Figure 6.3-1 presents information for the 20 percent worst days and vice-versa for Figure 6.3-2.
5. Section 6.3, Figures 6.3-3 and 6.3-4, Page 42: It appears that the labels for these figures are reversed. Figure 6.3-3 presents information on NO₃ but the caption indicates it is for SO₄ and vice-versa for Figure 6.3-4.
6. Section 7.2.4, Figures 7.2.4-2 and 7.2.4-3, Pages 55-56: These figures present data for two Community Multiscale for Air Quality (CMAQ) modeling runs labeled “CMAQ 2018g4a” and “CMAQ 2018g2b.” The difference between these two modeling runs should be described for clarity. It is assumed that the “CMAQ 2018g4a” refers to the VISTAS “Best and Final” run, but this should be clarified.
7. “Section 51.309(d)(3)(v)”, Page 89: Please clarify the cited provision related to smoke management on page 89 of the SIP Narrative to cite the Regional Haze regulations in 40 CFR 51.308, rather than 40 CFR 51.309, which applies to four

states out West. The correct citation and language is provided here: “Section 51.308 (d)(3)(iv)(E).”

8. Emissions Tables, Pages 87 and 89: To clarify the information in the tables for Solutia and International Paper – Courtland Mill on pages 87 and 89, it would be helpful to correlate the boiler names with the unit “ID’s” and provide a brief explanation of the numbers presented (e.g., emission projections in tons per year).
9. Reasonable Progress Goals (RPGs): Table 8.0-1 on page 94 of the SIP Narrative provides RPG values that do not match the values provided in Table 10-1 of Appendix H on page H-39. Please correct this discrepancy or note the reasons for the difference.
10. One Percent Reasonable Progress Threshold:
 - a) On page 70, the State identified a threshold of “greater than 1%” for further evaluating sources for reasonable progress. In other places in the text, the threshold is referred to as “at least 1%” (page Appendix H-5). Please clarify whether the threshold includes the one percent or not.
 - b) On page 78 of the SIP Narrative, a partial summary of the State’s rationale for selecting the one percent threshold is provided. A complete rationale is provided in Appendix H, Section 5.0 (no page numbers). To avoid confusion, please consider a reference to Appendix H for the complete discussion.
 - c) The table in Enclosure 1 indicates that there are two Louisiana facilities (i.e., the last two entries in the table, Chalmette Refinery and Murphy Oil) with a one percent impact at the Breton Class I area. These facilities are not presented in Table 7.6-5 of the Alabama SIP. For completeness, the State could consider to add them to Table 7.6-5, the fractional contribution analysis table for the Breton area.
 - d) Please clarify the header in the tables in the SIP Narrative and Appendix H, Table 5.2 to identify that the listed facilities fall within the reasonable progress screening threshold that the State is using to determine significant impact at a Class I area. This would clarify where different thresholds are being used for areas inside vs. outside the State.
11. Affected BART Facilities: The SIP Narrative and Appendix H provide different numbers of BART-eligible and BART exempt sources. For example, page 82 of the SIP Narrative states 40 sources were originally identified as BART-eligible versus 38 on page H-8. Similarly, page H-17 cites 36 facilities found exempt from BART through modeling versus 35 on page 8 of the SIP Narrative. Please correlate these numbers.
12. Facilities with Changed Names: We suggest that a notation be added for those facilities whose names have changed. For example, it appears that the

ExxonMobile Production Company in Enclosure 2 is the same as the Escambia Operating Company – Big Escambia Creek facility in the Alabama SIP.

13. Reasonable Progress references: Please clarify inadvertent uses of the term “reasonable further progress” and “RFP” intended to mean “reasonable progress”.

B. Appendices and Attachments:

1. Appendix H – Table 5.2: Since one Alabama source (TVA Widows Creek) has a one percent impact at the Joyce Kilmer Class I area, data should be added to Table 5.2 for this Class I area or at least mentioned in the text discussion.
2. Clean Air Interstate Rule (CAIR) Satisfies Reasonable Progress Assessment: Section 6.3, Step 3, of Appendix H on page H-4 provides a summary of the State’s determination if the CAIR is sufficient for reasonable progress for subject electric generating unit that is provided in full in SIP Narrative; Section 7.7, Step 3. The Appendix H description does not address the four factors as is done in the SIP Narrative. Please consider correlation of the two sections, or refer the reader in Appendix H to the SIP Narrative for complete details to avoid confusion.

Table 1

BRET AQI: 100m Trajectory Start Height:
 SOM Residence Time >= 5% of Maximum
 1% or Higher Contribution

State	County	Plant ID	Plant	Point ID	Measure Name	2018 SO2 tpy (Q)	CE (%)	d (km)	Qid	Qid*2	RTMax	Fraction
Mississippi	Harrison Co	2804700055	MISSISSIPPI POWER COMPANY, PLANT JACK WA	004	WSTAS 2018 Base Case	7.640	0	148.07	51.80	0.35	28.09	0.052
Louisiana	Plaquemines Par	0015	CONOCO-PHILLIPS COALLANCE REFINERY	11	WSTAS 2018 Base Case	1.664	0	87.80	17.02	0.17	76.94	0.047
Louisiana	St. Bernard Par	0003	OIL CARBON LLC/CHALMETTE	61	WSTAS 2018 Base Case	2.742	0	117.98	23.86	0.20	55.27	0.047
Louisiana	Plaquemines Par	0015	CONOCO-PHILLIPS COALLANCE REFINERY	10	WSTAS 2018 Base Case	1.662	0	87.80	16.99	0.17	76.94	0.047
Florida	Escambia Co	0330045	GULF POWER COMPANY - CRIST	6	WSTAS 2018 Base Case	12.421	0	230.94	40.65	0.20	16.70	0.033
Alabama	Mobile Co	1001	ALABAMA POWER COMPANY - BARRY	004	WSTAS 2018 Base Case	9.329	0	230.94	38.86	0.16	22.80	0.032
Louisiana	Ascension Par	0007	DUPONT CHEMICALS/BURNSIDE PLANT	01	WSTAS 2018 Base Case	13.275	0	186.52	86.54	0.33	12.20	0.029
Louisiana	St. Bernard Par	0005	CHALMETTE REFINERY LLC/CHALMETTE REFINERY	29	WSTAS 2018 Base Case	1.434	0	117.60	12.70	0.11	55.27	0.025
Louisiana	St. Bernard Par	0005	CHALMETTE REFINERY LLC/CHALMETTE REFINERY	28	WSTAS 2018 Base Case	1.462	0	117.60	12.43	0.11	55.27	0.025
Alabama	Mobile Co	1001	ALABAMA POWER COMPANY - BARRY	006	WSTAS 2018 Base Case	6.760	60	236.94	28.30	0.12	22.80	0.023
Alabama	Escambia Co	0007	EXXONMOBIL PRODUCTION COMPANY	014	WSTAS 2018 Base Case	14.895	0	278.40	52.59	0.19	11.07	0.023
Louisiana	Ascension Par	0003	PCS NITROGEN FERTILIZER L.P./GEGSMAR	01	WSTAS 2018 Base Case	10.799	0	215.29	50.18	0.23	12.20	0.022
Louisiana	St. James Par	0001	MOTIVA ENTERPRISES LLC/CONVENT	16	WSTAS 2018 Base Case	9.459	0	197.24	47.86	0.24	12.20	0.021
Louisiana	St. Mary Par	0005	COLUMBIAN CHEM CO/NORTH BEND	61	WSTAS 2018 Base Case	11.325	0	226.92	52.11	0.23	10.76	0.020
Louisiana	St. Bernard Par	0001	MURPHY OIL USA, INC./MERAUX REFINERY	28	WSTAS 2018 Base Case	1.053	0	115.36	9.47	0.08	55.27	0.019
Mississippi	Jackson Co	2805900058	CHEVRON PRODUCTS COMPANY, PASCAGOULA REF	051	WSTAS 2018 Base Case	2.239	4	123.85	18.08	0.15	22.80	0.018
Alabama	Mobile Co	1001	ALABAMA POWER COMPANY - BARRY	003	WSTAS 2018 Base Case	5.235	0	230.94	21.32	0.09	22.80	0.018
Alabama	Mobile Co	1001	ALABAMA POWER COMPANY - BARRY	002	WSTAS 2018 Base Case	5.145	0	230.94	21.44	0.09	22.80	0.016
Alabama	Mobile Co	5009	AKZO NOBEL CHEMICALS INC	003	WSTAS 2018 Base Case	4.407	0	235.58	18.71	0.08	22.80	0.015
Florida	Escambia Co	0330045	GULF POWER COMPANY - CRIST	7	WSTAS 2018 Base Case	4.643	60	260.15	18.56	0.07	15.70	0.013
Louisiana	Plaquemines Par	0001	CHEVRON OROONITE CO/OAK POINT PLANT	08	WSTAS 2018 Base Case	482	0	108.57	4.49	0.04	76.94	0.012
Louisiana	Pointe Coupee P	0005	LA GENERATING LLC/BIG CAJUN 2 PWR PLNT	01	WSTAS 2018 Base Case	17.918	0	275.00	65.15	0.24	5.27	0.012
Mississippi	Harrison Co	2804700115	DUPONT DELISLE FACILITY	024	WSTAS 2018 Base Case	1.645	4	137.86	11.92	0.09	28.09	0.012
Louisiana	Pointe Coupee P	0005	LA GENERATING LLC/BIG CAJUN 2 PWR PLNT	02	WSTAS 2018 Base Case	17.354	0	275.14	63.07	0.23	5.27	0.012
Mississippi	Harrison Co	2304700115	DUPONT DELISLE FACILITY	025	WSTAS 2018 Base Case	1.627	4	137.98	11.76	0.09	28.09	0.012
Louisiana	Pointe Coupee P	0005	LA GENERATING LLC/BIG CAJUN 2 PWR PLNT	53	WSTAS 2018 Base Case	16.561	0	275.26	60.83	0.22	5.27	0.011
Alabama	Mobile Co	1001	ALABAMA POWER COMPANY - BARRY	005	WSTAS 2018 Base Case	3.267	40	236.94	13.62	0.06	22.80	0.011
Mississippi	Jackson Co	2805900058	CHEVRON PRODUCTS COMPANY, PASCAGOULA REF	017	WSTAS 2018 Base Case	1.355	45	123.85	10.56	0.09	28.09	0.011
Louisiana	St. Bernard Par	0005	CHALMETTE REFINERY LLC/CHALMETTE REFINERY	84	WSTAS 2018 Base Case	576	0	117.60	4.89	0.04	55.27	0.010
Louisiana	St. Bernard Par	0001	MURPHY OIL USA, INC./MERAUX REFINERY	11	WSTAS 2018 Base Case	551	0	115.29	4.78	0.04	55.27	0.010

Table 2

SAMA ACl 100m Trajectory Start Height
 SO4 Residence Time >= 5% of Maximum
 1% or Higher Contribution

State	County	Plant ID	Plant	Point ID	Measure Name	2018 SO2 tpy (Q)	CE (%)	d (km)	Q/d^2	RTMax	Fraction
Florida	Citrus Co	0170004	PROGRESS ENERGY FLORIDA, INC. CRYSTAL RI	2	VISTAS 2018 Base Case	15,241	0	180.58	0.42	17.27	0.085
Florida	Citrus Co	0170004	PROGRESS ENERGY FLORIDA, INC. CRYSTAL RI	1	VISTAS 2018 Base Case	13,537	0	180.58	0.38	17.27	0.068
Florida	Taylor Co	1230001	BUCKEYE FLORIDA, LIMITED PARTNERSHIP	4	VISTAS 2018 Base Case	860	4	81.48	0.23	75.55	0.050
Florida	Taylor Co	1230001	BUCKEYE FLORIDA, LIMITED PARTNERSHIP	7	VISTAS 2018 Base Case	726	0	81.48	0.19	75.55	0.042
Florida	Taylor Co	1230001	BUCKEYE FLORIDA, LIMITED PARTNERSHIP	6	VISTAS 2018 Base Case	647	0	81.48	0.17	75.55	0.037
Florida	Taylor Co	1230001	BUCKEYE FLORIDA, LIMITED PARTNERSHIP	2	VISTAS 2018 Base Case	524	0	81.48	0.14	75.55	0.030
Florida	Wakulla Co	1230003	ST. MARKS POWDER, INC. A GENERAL DYNAMIC	11	VISTAS 2018 Base Case	86	0	111.85	0.03	75.55	0.028
Florida	Citrus Co	0170004	PROGRESS ENERGY FLORIDA, INC. CRYSTAL RI	4	VISTAS 2018 Base Case	6,120	80	180.58	0.17	17.27	0.028
Florida	Taylor Co	1230001	BUCKEYE FLORIDA, LIMITED PARTNERSHIP	11	VISTAS 2018 Base Case	430	0	81.48	0.12	75.55	0.026
Georgia	Dougherty Co	08500002	GEORGIA POWER COMPANY, MITCHELL STEAM-EL	SG03	VISTAS 2018 Base Case	4,830	0	150.49	0.22	16.16	0.025
Florida	Jackson Co	0830014	GULF POWER COMPANY, SCHOLZ ELECTRIC GENER	1	VISTAS 2018 Base Case	1,880	0	85.55	0.22	25.02	0.024
Florida	Jackson Co	0830014	GULF POWER COMPANY, SCHOLZ ELECTRIC GENER	2	VISTAS 2018 Base Case	1,880	0	85.55	0.22	25.02	0.024
Alabama	Escambia Co	0007	EXXONMOBIL PRODUCTION COMPANY	014	VISTAS 2018 Base Case	14,895	0	325.51	0.14	10.91	0.023
Florida	Escambia Co	03300045	GULF POWER COMPANY - CRIST	6	VISTAS 2018 Base Case	12,421	0	298.97	0.14	11.11	0.022
Georgia	Monroe Co	20700008	GEORGIA POWER COMPANY, SCHERER STEAM-EL	SG03	VISTAS 2018 Base Case	27,735	0	331.91	0.25	5.17	0.020
Florida	Bay Co	00500008	STONE CONTAINER CORPORATION	16	VISTAS 2018 Base Case	2,108	4	142.53	0.10	28.58	0.020
Georgia	Monroe Co	20700008	GEORGIA POWER COMPANY, SCHERER STEAM-EL	SG04	VISTAS 2018 Base Case	26,616	0	331.91	0.24	5.17	0.018
Georgia	Monroe Co	20700008	GEORGIA POWER COMPANY, SCHERER STEAM-EL	SG01	VISTAS 2018 Base Case	26,284	0	331.91	0.24	5.17	0.018
Georgia	Monroe Co	20700008	GEORGIA POWER COMPANY, SCHERER STEAM-EL	SG02	VISTAS 2018 Base Case	26,075	0	331.91	0.24	5.17	0.018
Alabama	Pike Co	0015	SANDERS LEAD CO	003	VISTAS 2018 Base Case	7,383	0	256.39	0.11	12.50	0.017
Alabama	Pike Co	0015	SANDERS LEAD CO	008	VISTAS 2018 Base Case	7,121	0	256.39	0.11	12.50	0.016
Florida	Citrus Co	0170004	PROGRESS ENERGY FLORIDA, INC. CRYSTAL RI	3	VISTAS 2018 Base Case	3,034	80	180.58	0.10	17.27	0.016
Georgia	Early Co	062NEW	LONGLEAF ENERGY STATION	BOIL1	VISTAS 2018 Base Case	3,227	0	194.52	0.14	12.38	0.013
Georgia	Early Co	062NEW	LONGLEAF ENERGY STATION	BOIL2	VISTAS 2018 Base Case	3,227	0	194.52	0.14	12.38	0.013
Georgia	Conasa Co	07700001	GEORGIA POWER COMPANY, YATES STEAM-ELECT	SG07	VISTAS 2018 Base Case	16,530	0	381.77	0.11	5.07	0.010
Georgia	Early Co	06800001	GEORGIA PACIFIC CORPORATION, CEDAR SPRIN	U501	VISTAS 2018 Base Case	2,533	4	148.70	0.11	12.38	0.010
Georgia	Conasa Co	07700001	GEORGIA POWER COMPANY, YATES STEAM-ELECT	SG06	VISTAS 2018 Base Case	16,367	0	381.77	0.11	5.07	0.010
Florida	Hernando Co	05300021	FLORIDA CRUSHED STONE CO., INC.	18	VISTAS 2018 Base Case	2,854	4	237.81	0.06	17.27	0.010
Georgia	Early Co	06800001	GEORGIA PACIFIC CORPORATION, CEDAR SPRIN	U500	VISTAS 2018 Base Case	2,438	4	148.70	0.11	12.38	0.010
Florida	Bay Co	0050014	GULF POWER COMPANY, LANSING SMITH PLANT	2	VISTAS 2018 Base Case	1,062	0	149.23	0.05	28.58	0.010