Alexandria Arlington Resource Recovery Facility

Fiscal Year 2025
Second Quarter Operations Report
Draft

January 2025

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Definition of Abbreviations & Acronyms

Abbreviation/Acronym	Definition
APC	Air Pollution Control
Apr	April
Aug	August
Avg	Average
BCU	Boiler Capacity Utilization
Btu	British thermal unit
CEMS	Continuous Emissions Monitoring System
CO	Carbon Monoxide
Dec	December
ECOM	Emergency Communications
Feb	February
FMG	Facility Monitoring Group
FY	Fiscal Year
gal	Gallon
GAT	Guaranteed Annual Tonnage
HCl	Hydrochloric (Hydrogen Chlorides)
HDR	HDR Engineering Inc
HHV	Estimated Waste Heating Value (Btu/lb)
ID	Induced Draft
Jan	January
Jul	July
Jun	June
klbs	Kilo-pounds (1,000 lbs)
kWh	Kilowatt hours (1,000 watt-hours)
lbs	Pounds
Mar	March
Max	Maximum
May	May
Min	Minimum
MSW	Municipal Solid Waste
MWh	Megawatt hours
No	Number
NOV	Notice of Violation
Nov	November
NO_x	Nitrogen Oxide
Oct	October
OSHA	Occupational Safety and Health Administration
ppm	Parts per million
ppmdv	Parts per million dry volume
PSD	Prevention of Significant Deterioration
Q1	First Quarter
Q2	Second Quarter
Q3	Third Quarter
Q4	Fourth Quarter
RAAI	Reworld Alexandria Arlington, Inc.
RE	Reportable Exempt
RNE	Reportable Non-Exempt
SDA	Spray Dryer Absorber
Sep	September
SO_2	Sulfur Dioxide
TCLP	Toxicity Characteristic Leaching Procedure
VADEQ	Virginia Department of Environmental Quality
yr	Year
YTD	Year to date

Alexandria/Arlington Waste-to-Energy Facility
Second Quarter Operations Report – Fiscal Year 2025

1.0 Purpose of Report

HDR Engineering, Inc. (HDR) was authorized by the Facility Monitoring Group (FMG) to conduct quarterly site assessments and provide quarterly reports regarding the operation and maintenance of the Reworld Alexandria/Arlington Waste-to-Energy Facility (Facility) for the 2025 Fiscal Year. This report is prepared for the second quarter of the 2025 Fiscal Year and summarizes Facility operations between October 1, 2024, and December 31, 2024. This report is based upon HDR's experience in the waste-to-energy industry, upon site observation visits and previous reports provided by HDR, and upon data provided by Reworld Alexandria/Arlington, Inc. (RAAI), the Facility owner and operator.

2.0 Executive Summary

RAAI operated the Facility in an acceptable manner and in accordance with established waste-to-energy industry practices during Q2FY25. The operation of the Facility, maintenance, safety, and overall cleanliness continue to be above average. The Facility did not experience any environmental permit deviations during the quarter.

During Q2FY25, the boilers experienced one (1) instance of scheduled downtime totaling 198 hours, six (6) instances of unscheduled downtime totaling 163 hours and three (3) instances of standby downtime totaling 74 hours. The turbine generators experienced one (1) instance of scheduled downtime totaling 116 hours, one (1) instance of unscheduled downtime totaling 68 hours during the quarter and four (4) instances of standby time totaling 105 hours. A detailed listing of downtime is provided in Section 5.1 of this report.

Average waste processed during the quarter was 942 tons per day, or 97% of nominal facility capacity which compares very favorably to industry averages. Waste deliveries averaged 917 tons per day, which is lower (2.7%) than the burn rate. Compared to the corresponding quarter in FY24, during Q2FY25 MSW processed was higher (2.6%), steam production increased (2.6%), and electricity generated (gross) increased (1.8%). The increase in steam generation was

attributable to the higher BCU, more (2.6%) waste processed offset by a lower (1.5%) waste heating value and more (80 additional) downtime hours. The increase in electrical generation is attributable to the increase in steam production (2.6%), offset by more (42 hours) downtime experience by the Turbine Generators.

3.0 Facility Inspection and Records Review

In December 2024, HDR met with the Facility management and other plant personnel to discuss Facility operations and maintenance, perform an independent visual inspection of the operating Facility, photograph areas of interest, and perform a review of recent Facility activity. HDR obtained operating data and monthly reports electronically from RAAI throughout the quarter and maintains a running tabulation of the status of corrective actions and plant performance trends. RAAI provides the following documents for each month:

- Facility Monthly Operating Reports
- Monthly Continuous Emissions Monitoring System (CEMS) Reports

Table 1 summarizes maintenance, repair, and plant condition issues reported during this and prior reporting periods. An “A” indicates an issue of the highest priority and worthy of immediate attention. Such items are usually safety or operability issues. A “B” indicates that the issue needs to be dealt with as quickly as possible but is not urgent. These items will usually result in a process improvement or will help avoid future “urgent” issues. A “C” indicates that the issue should be dealt with in due course but is not a priority issue. This category might include issues related to aesthetics, non-urgent maintenance, or housekeeping improvements which are not safety related. Note that HDR site assessments are generally performed while equipment is operating, and are not intended to address the internal condition, performance or life expectancy of mechanical, electrical, and electronic equipment and structures. HDR site assessments are only performed quarterly, generally representing findings on the day of the assessment. RAAI is responsible, without limitation, for operations, maintenance, environmental performance, and safety and should not rely on HDR observations or inspection reports which are overviews of Facility external conditions only.

Table 1: Summary of Inspection Report Deficiencies

*A is highest priority & demands immediate attention: B needs attention but is not urgent; C can be addressed at earliest opportunity & is not urgent.

Item No.	Inspection Report Deficiencies	Issue Reported	Priority*	HDR Recommendation	Status	Open / Closed
1	Pavement spider-cracking at Tipping Floor Entrance	November 2016	C	Resurface section of pavement at Tipping Floor Entrance	**Status Unchanged**	Open
2	SDA Penthouse No. 3 Door deteriorated at base	November 2017	C	Patch and Paint Door – Replace if necessary	**Status Unchanged**	Open
3	Deterioration behind lime slurry piping in SDA Penthouse No. 2	August 2019	C	Conduct painting preservation measures	**Status Unchanged**	Open
4	Siding deteriorated beneath Baghouse No. 3 Hoppers	August 2019	C	Replace siding	**Status Unchanged**	Open
5	Siding on north side of Baghouse No. 2 Deteriorated	February 2020	C	Replace siding and conduct painting preservation measures	**Status Unchanged**	Open
6	Damaged/Missing insulation and lagging throughout Facility	August 2020	C	Perform audit of all steam piping and replace damaged/missing insulation and lagging throughout the Facility as needed	**Status Unchanged**	Open
7	Insulation and lagging damaged/deteriorated around Boiler No. 3 Steam Drum	February 2021	C	Replace insulation and lagging	**Status Unchanged**	Open
8	Baghouse hopper heaters set to manual; heater off but signaling low temperature.	February 2021	B	Repair hopper heaters	**Status Unchanged**	Open
9	Feed Chute Cooling Jacket Water Level Boxes empty on Boilers No. 1 and 2	May 2021	B	Repair feed chute cooling jacket water level boxes	**Status Unchanged**	Open
10	Uneven water flow from Cooling Tower nozzle/distribution on southeast side of tower	August 2021	C	Repair nozzle	**Status Unchanged**	Open
11	A temporary pump is being utilized on the ground floor of the Turbine Hall to transport wastewater from the trench drains to the Cooling Tower basin.	November 2022	B	Consider a permanent pump installation in lieu of temporary.	**Status Unchanged**	Open
12	There is a small section of building siding missing on the east side (near the Tipping Floor entrance).	May 2023	C	Repair/Replace siding.	**Status Unchanged**	Open
13	Grounding wire on southwest corner of Cooling Tower not secured.	May 2023	B	Repair grounding wire.	**Status Unchanged**	Open
14	There is a hole in stairs near Boiler No. 1 grate system.	May 2024	B	Repair stairs.	**During December 2024 hole appeared to be in the process of repair**	Open
15	Truck entrance gate damaged	May 2024	C	Repair gate	**Gate Repaired**	Closed
17	Double dump valve not operating on Boiler No. 3 Economizer	August 2024	B	Repair valve	**Repaired**	Closed
18	Steam leak identified West side of Boiler No. 2 auxiliary burner elevation	August 2024	B	Repair leak	**Status Unchanged**	Open
19	Insulation missing around main steam isolation valve on Boiler No. 3.	August 2024	C	Add Insulation	**Status Unchanged**	Open

Item No.	Inspection Report Deficiencies	Issue Reported	Priority*	HDR Recommendation	Status	Open / Closed
20	Cooling Tower water siding deteriorating	August 2024	C	Repair siding	**Status Unchanged**	Open
21	Miscellaneous material on cooling tower deck	August 2024	C	Remove items	**Items were removed as of December 2024**	Closed
22	Corrosion on Circulating Water Pump Housing	August 2024	C	Replace housing	**Status Unchanged**	Open
23	Roof ventilation fan above deaerator not operating	August 2024	C	Repair fan	**Status Unchanged**	Open
24	Refractory damage around G9B-11 sootblower on Boiler No. 1	August 2024	C	Repair refractory	**Status Unchanged**	Open
25	Tipping Floor exit door remains open during accepting hours.	October 2024	B	Review functionality and requirements. Door was designed to be operated automatically during accepting hours.	**Status Unchanged**	Open
26	Minor leak on Unit 1 external piping on LN Nozzle elevation	October 2024	C	Repair Leak	**Status Unchanged**	Open
27	Boiler penthouse lights are out of service over Boiler No. 1	October 2024	C	Repair Lighting	**Status Unchanged**	Open
28	Boiler No. 1 side wall of feed chute in poor condition	December 2024	B	Repair patch and replace feedchute	**New**	Open

4.0 Facility Performance

Monthly operating data provided by RAAI indicates that 86,704 tons of MSW were processed during Q2FY25, and a total of 84,341 tons of MSW including 1,438 tons of Special Handling Waste (1.7% by weight) were received. Total ash production during the quarter was 17,593 tons, which represents 20.3% of the waste processed. The average uncorrected steam production rate for Q2FY25 was 3.0 $tons_{steam}/ton_{waste}$, which is consistent with the corresponding quarter in FY24.

Chart 1: Tons of Waste Processed

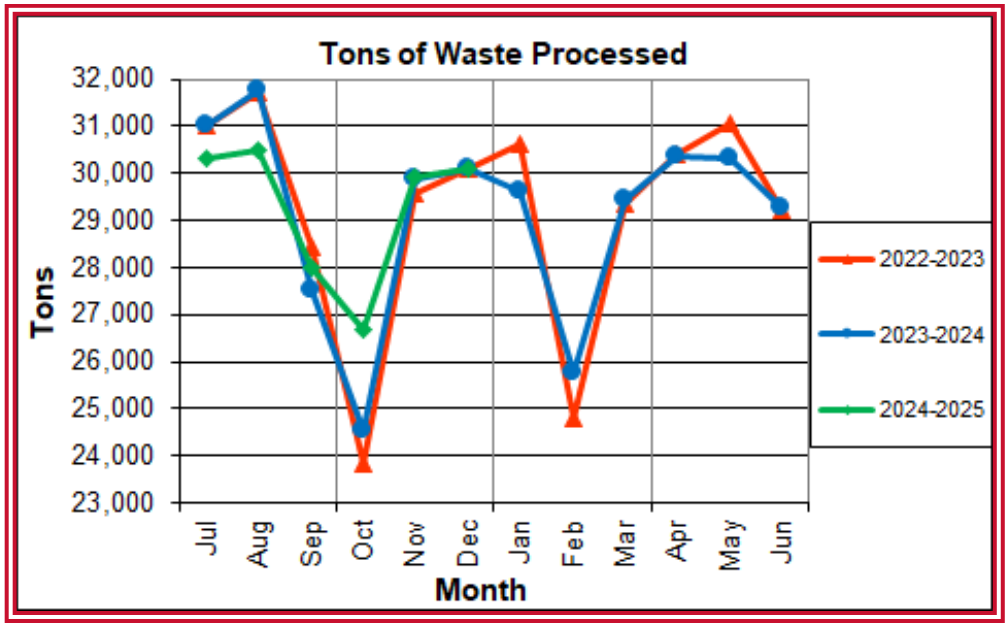


Chart 1 illustrates that Q2FY25 waste processed was more (2.6%) than the corresponding quarter, Q2FY24 despite more (80.3 hours) downtime experienced by the boilers. This is likely due to the increase in boiler steam capacity and throughput when the boilers were operating. RAAI reported that 681 tipping floor/MSW internal inspections were performed during the quarter and there was one (1) Notice of Violation (NOV) issued throughout the quarter for excessive metal in the load during the month of December.

Chart 2: Tons of Ash Produced per Ton of Waste Processed

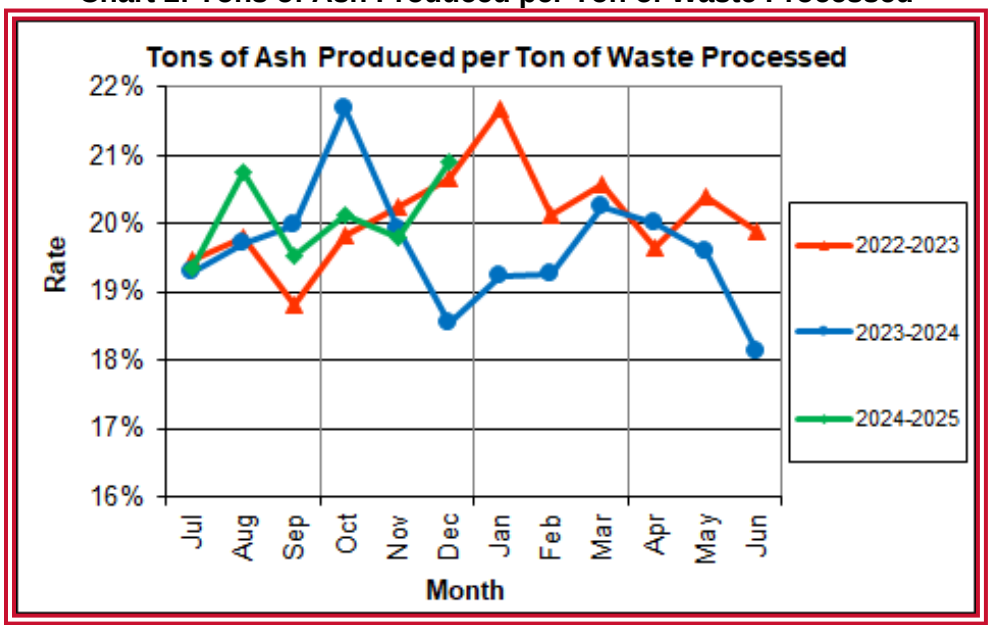


Chart 2 illustrates that the average ash production rate in Q2FY25 slightly increased (0.4 percentage points) to 20.3% of processed waste, compared to the corresponding quarter in FY24 when the rate was 19.9%.

Chart 3: Ferrous Recovery Rate

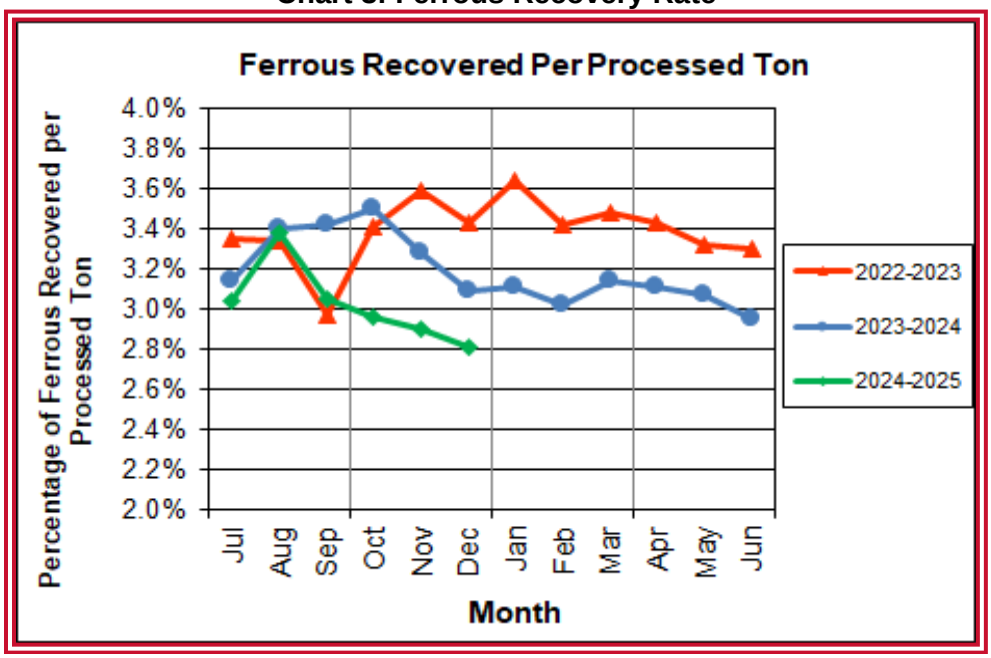
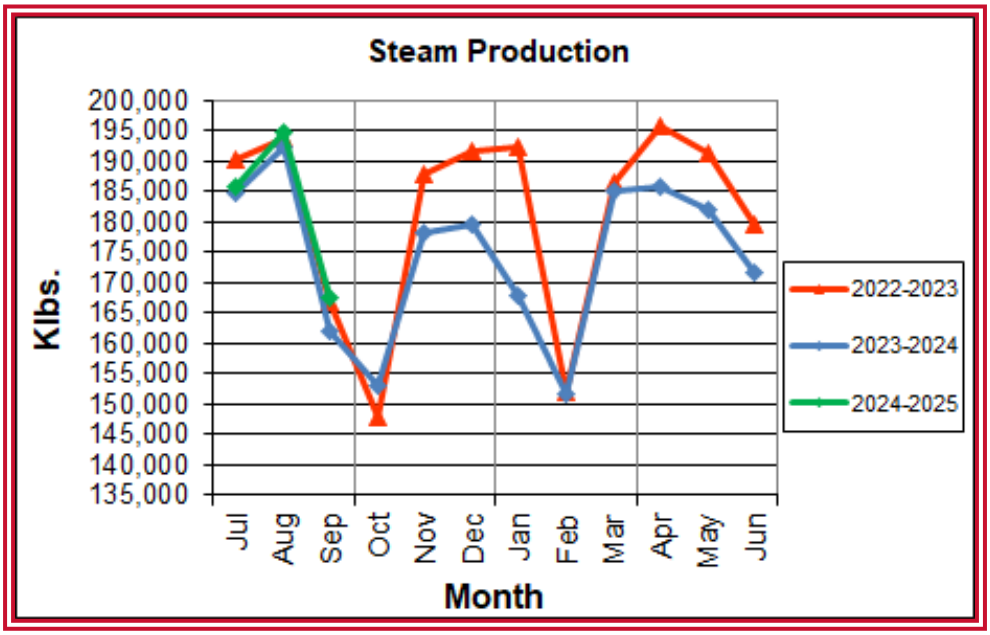


Chart 3 depicts the monthly ferrous metal recovery rate as a percentage of processed MSW tonnage. In Q2FY25, 2,505 tons of ferrous metal were recovered, which is 9.5% lower than the corresponding quarter in FY24. Chart 3 illustrates that the ferrous recovery rate in Q2FY25 was 0.4 percentage points lower, at 2.9%

of processed waste, compared to the corresponding quarter in FY24 when the rate was 3.3%. Throughout the first two (2) quarters of FY25, the ferrous recovery rate has continued to trend downward despite more (0.5%) waste processed in the fiscal year to date, which is indicative of a decline in performance of the metal recovery equipment.

Chart 4: Steam Production



In Chart 4, the total steam production for Q2FY25 was 524,546 klbs, 2.6% higher than the corresponding quarter in FY24. The increase in steam production, despite more downtime experienced by the refuse boilers, is attributable to the boilers operating at a higher (5.1%) BCU compared to Q2FY24.

Chart 5: 12-Month Rolling Steam Production

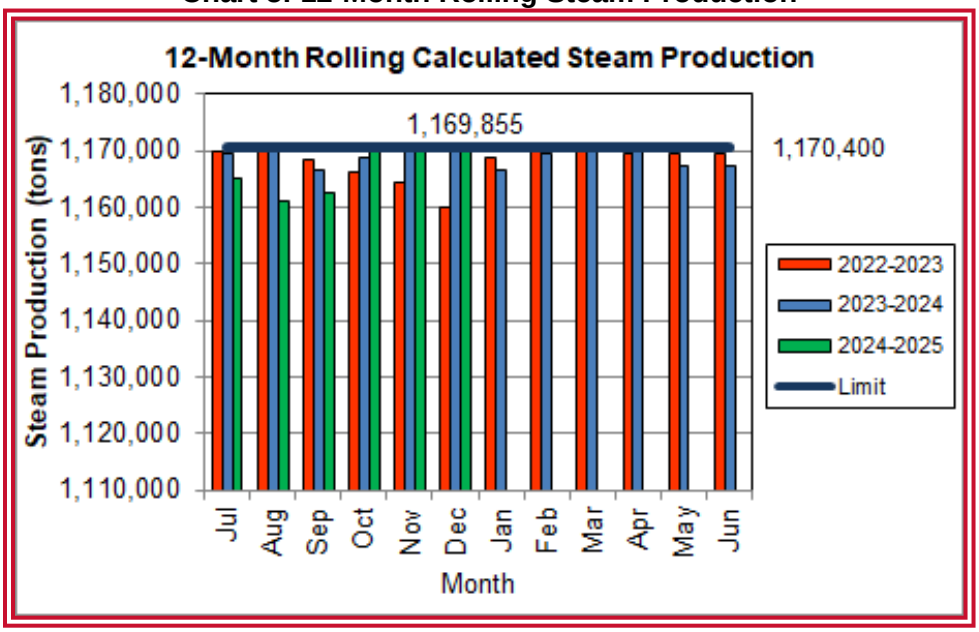
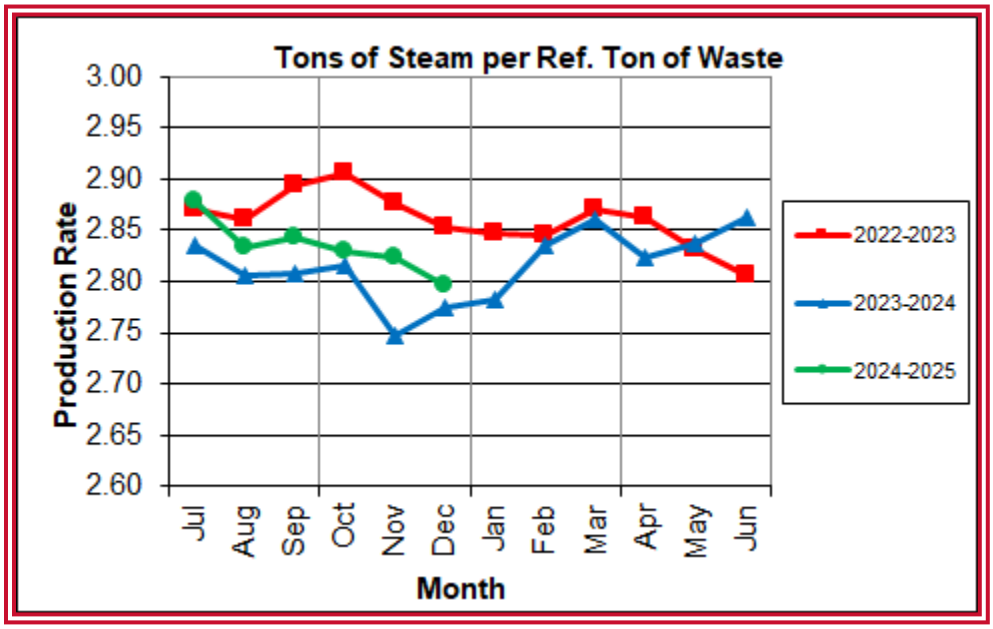


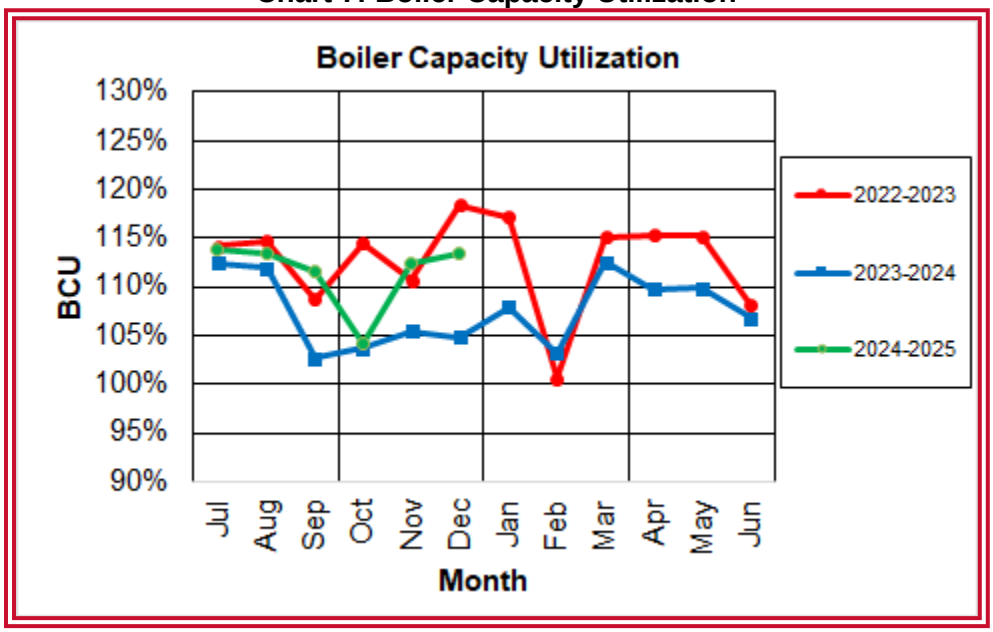
Chart 5 depicts the 12-month rolling steam production for Q2FY25, and for the previous two (2) fiscal years. According to the Title V permit, the annual steam production for the Facility shall not exceed 1,170,400 tons based on an average value of 3.34 lbs. of steam per lb. of MSW processed, calculated monthly as the sum of each consecutive 12-month period. The Facility complied with the 12-month rolling steam production total every month in Q2FY25. The 12-month rolling total for steam production ending in December 2024 was 1,169,855 tons, which is 99.95% of the limit. Chart 5 shows that Facility throughput, and in turn, steam and electricity production are being throttled to stay below the steam production permit limit each month.

Chart 6: Steam Production Rate



In Chart 6, the conversion of raw waste tonnages into “reference tons” is another way of analyzing steam production and helps to determine whether changes are related to boiler performance or to fuel issues. “Reference tons” are adjusted to account for the calculated average fuel heating value, so that lower BTU fuel raw tonnages are adjusted upwards and vice versa. In Q2FY25, this metric tracked higher (1.4%) at 2.82 $tons_{steam}/ton_{ref}$ compared to the corresponding quarter in FY24 and is indicative of an increase in boiler performance.

Chart 7: Boiler Capacity Utilization



In Chart 7, the boiler capacity utilization (BCU) refers to the total steam production in respect to the total availability. This metric demonstrates how the boilers are operating compared to the design maximum continuous rating (MCR) when the units are online. The BCU during Q2FY25 was 110% compared to the corresponding quarter in FY24 when the BCU was 105%, indicative of the boilers being operated at a higher capacity.

Chart 8: Calculated Waste Heating Value

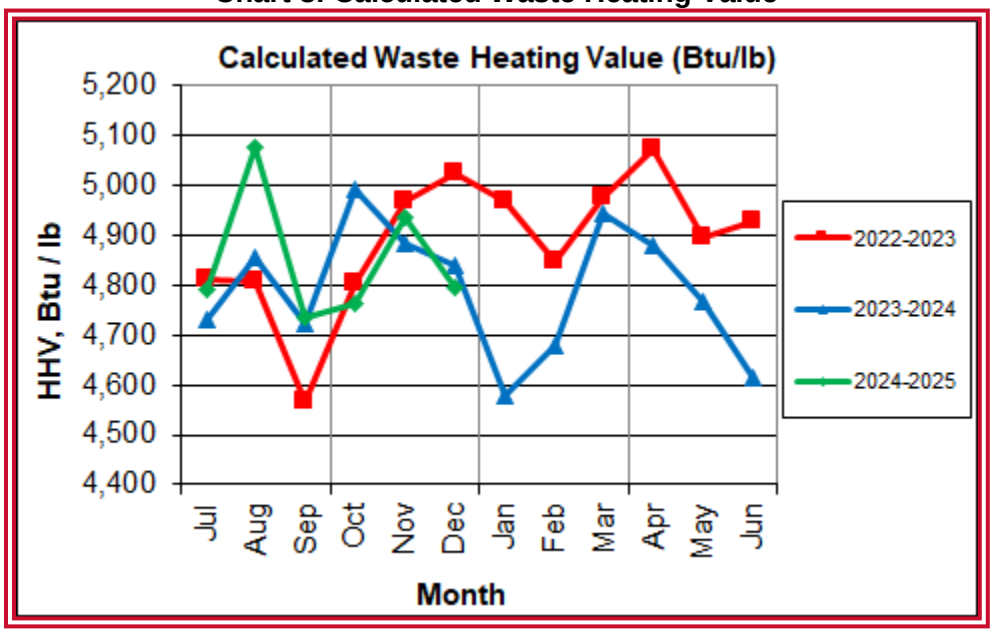


Chart 8 illustrates that Q2FY25 calculated average waste heating value was lower (1.5%) at 4,832 Btu/lb than the corresponding quarter in FY24, which averaged 4,906 Btu/lb. Note that 5.9[1] inches of precipitation were recorded at Ronald Reagan National Airport during Q2FY25, which is 3.7 inches less than the corresponding quarter in FY24 and does not correlate to the trend.

[1] https://www.wunderground.com/

Table 2: Quarterly Performance Summaries

Month		Waste Processed (tons)	Waste Diverted (tons)	Ash Shipped (tons)	Special Handling (Supplemental) (tons)	Ferrous Recovered (tons)	Steam Produced (klbs)	Net Electrical Generation (MWh)
Q2FY23	**Quarterly Totals**	**83,527**	**0**	**16,938**	**1,563**	2,906	**527,403**	**30,600**
	October-22	23,849	0	4,726	444	812	147,942	7,494
	November-22	29,578	0	5,987	582	1,063	187,745	9,412
	December-22	30,100	0	6,225	537	1,031	191,716	13,694
Q2FY24	**Quarterly Totals**	**84,502**	**0**	**16,858**	**1,581**	**2,769**	**511,201**	**34,974**
	October-23	24,522	0	5,318	628	859	153,214	9,998
	November-23	29,886	0	5,956	482	981	178,311	12,219
	December-23	30,094	0	5,584	471	929	179,676	12,757
Q2FY25	**Quarterly Totals**	**86,704**	**0**	**17,593**	**1,438**	**2,505**	**524,546**	**35,804**
	October-24	26,698	0	5,377	397	790	159,901	10,698
	November-24	29,905	0	5,922	609	868	185,345	12,935
	December-24	30,101	0	6,294	432	847	179,300	12,171
FY25 YTD Totals		**88,836**	**0**	**17,669**	**1,282**	**2,807**	**548,483**	**35,481**
FY24 Totals		**90,265**	**0**	**17,741**	**1,923**	**2,992**	**539,326**	**35,778**
FY23 Totals		**91,131**	**0**	**17,655**	**2,135**	**2,941**	**550,954**	**37,251**

Table 2 presents the production data provided to HDR by RAAI for Q2FY25 on both a monthly and quarterly basis. For purposes of comparison, Q2FY23 and Q2FY24 are shown, as well as FY23, FY24 and FY25 year-to-date (YTD) totals. In comparing quarterly totals, the data shows:

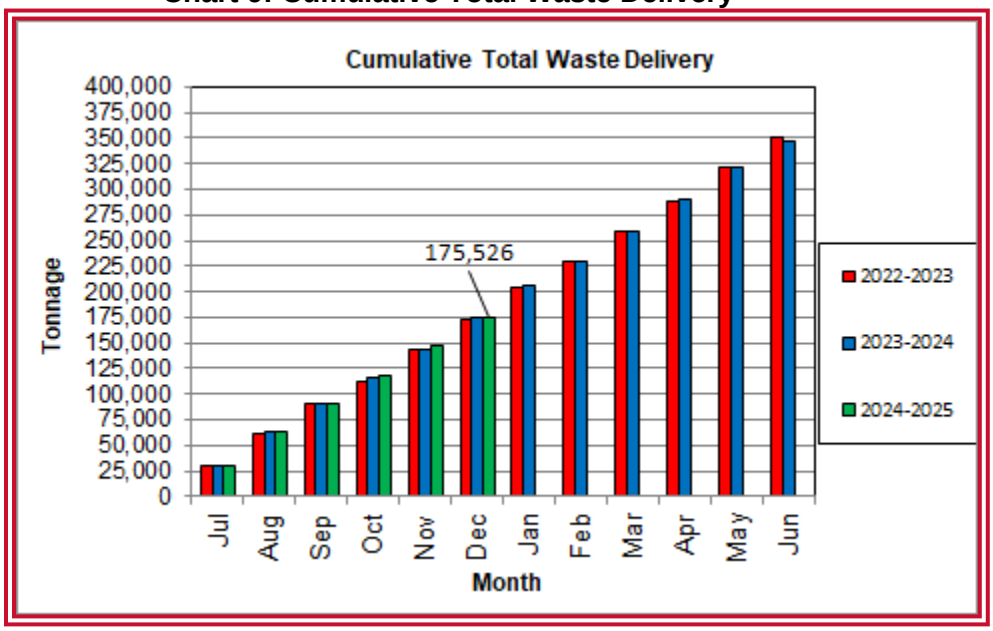
- More waste was processed in Q2FY25 than Q2FY24 and Q2FY23
- More steam was generated in Q2FY25 than Q2FY24 but less than Q2FY23
- More electricity (net) was generated in Q2FY25 than Q2FY24 and Q2FY23
- Less supplemental waste was received in Q2FY25 than Q2FY24 and Q2FY23

Note that the total steam generation figures presented in Table 2 do not correlate with the annual steam production limit from the Facility Permit; such limits apply on an annual rolling average, evaluated monthly.

Table 3: Waste Delivery Classification

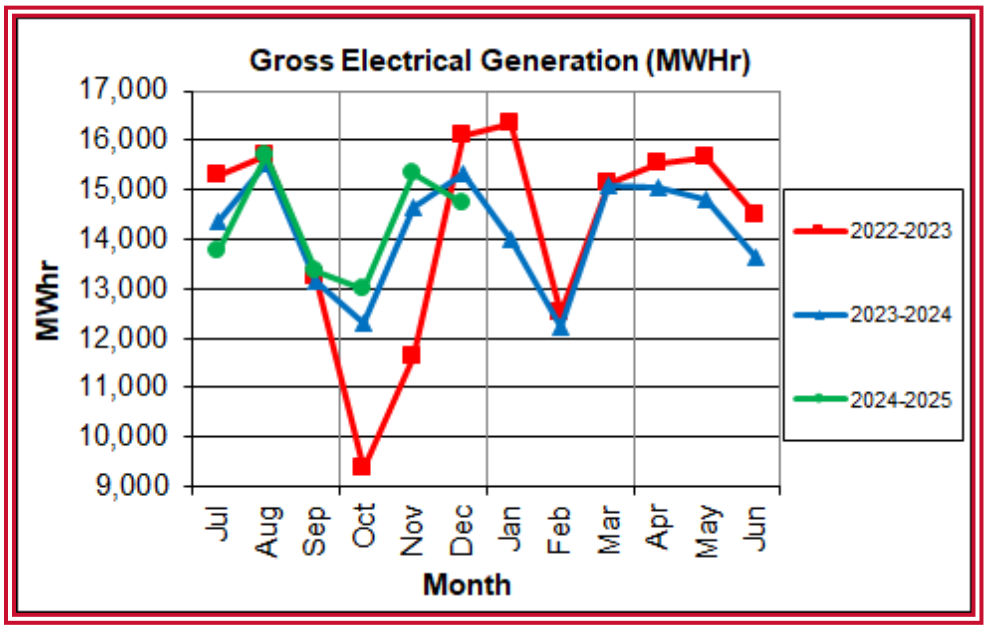
		Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Totals	% of Total
FY21	City Waste	1,583	1,905	2,121	1,906	1,970	1,999	1,556	1,393	2,038	2,102	2,042	2,197	22,811	6.55%
	County Waste	2,377	2,713	2,711	2,589	2,550	2,646	2,365	2,054	2,441	2,472	2,542	2,682	30,143	8.66%
	Municipal Solid Waste	22,517	26,941	24,523	22,102	19,209	25,831	22,419	20,046	25,980	25,621	25,260	24,603	285,053	81.88%
	Supplemental Waste	691	1,139	927	1,045	930	859	895	1,070	747	653	519	641	10,117	2.91%
	MSW Totals	**27,169**	**32,698**	**30,282**	**27,642**	**24,659**	**31,336**	**27,234**	**24,562**	**31,207**	**30,848**	**30,363**	**30,123**	**348,124**	**100.00%**
		Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Totals	% of Total
FY22	City Waste	1,853	2,080	2,042	1,855	2,002	1,914	1,628	1,570	1,900	1,895	2,107	2,203	23,049	6.58%
	County Waste	2,516	2,403	2,457	2,184	2,463	2,489	2,232	2,192	2,519	2,394	2,761	2,717	29,337	8.38%
	Municipal Solid Waste	24,682	26,646	25,378	19,376	23,834	27,424	24,212	19,114	23,465	25,745	27,057	23,637	290,569	83.01%
	Supplemental Waste	688	778	479	514	534	499	448	349	626	685	756	735	7,090	2.03%
	MSW Totals	**29,740**	**31,907**	**30,356**	**23,929**	**28,832**	**32,326**	**28,520**	**23,225**	**28,510**	**30,719**	**32,681**	**29,291**	**350,035**	**100.00%**
		Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Totals	% of Total
FY23	City Waste	1,841	2,020	1,874	1,827	2,046	1,872	1,880	1,566	1,829	1,887	2,035	1,913	22,590	6.43%
	County Waste	2,339	2,471	2,454	2,188	2,448	2,333	2,453	2,092	2,444	2,104	2,656	2,571	28,552	8.13%
	Municipal Solid Waste	24,434	26,977	23,660	17,994	24,827	25,487	26,656	21,209	23,673	24,530	29,037	24,013	292,500	83.32%
	Supplemental Waste	656	797	682	444	582	537	559	592	582	567	682	723	7,403	2.11%
	MSW Totals	**29,270**	**32,265**	**28,670**	**22,454**	**29,905**	**30,229**	**31,548**	**25,460**	**28,527**	**29,087**	**34,410**	**29,220**	**351,045**	**100.00%**
		Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Totals	% of Total
FY24	City Waste	1,780	2,149	1,746	1,735	1,889	1,688	1,829	1,603	1,650	1,887	2,106	1,812	21,874	6.29%
	County Waste	2,521	2,755	2,461	2,519	2,612	2,465	2,543	2,378	2,437	2,650	2,966	2,545	30,852	8.87%
	Municipal Solid Waste	25,031	26,225	23,276	19,985	22,285	26,796	25,750	20,805	23,119	26,211	27,185	20,780	287,450	82.64%
	Supplemental Waste	692	702	529	628	482	471	500	492	556	505	535	503	6,596	1.90%
	MSW Totals	**30,024**	**32,911**	**28,013**	**24,867**	**27,269**	**31,420**	**30,623**	**25,278**	**27,763**	**31,253**	**32,792**	**25,639**	**347,852**	**100.00%**
		Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Totals	% of Total
FY25	City Waste	1,837	1,660	1,648	1,869	1,694	1,778							10,485	5.97%
	County Waste	2,640	2,738	2,619	2,946	2,611	2,715							16,269	9.27%
	Municipal Solid Waste	25,456	28,049	23,255	21,665	23,669	23,957							146,052	83.21%
	Supplemental Waste	453	480	349	397	609	432							2,719	1.55%
	MSW Totals	**30,387**	**32,927**	**27,871**	**26,877**	**28,582**	**28,882**							**175,526**	**100.00%**

Chart 9: Cumulative Total Waste Delivery



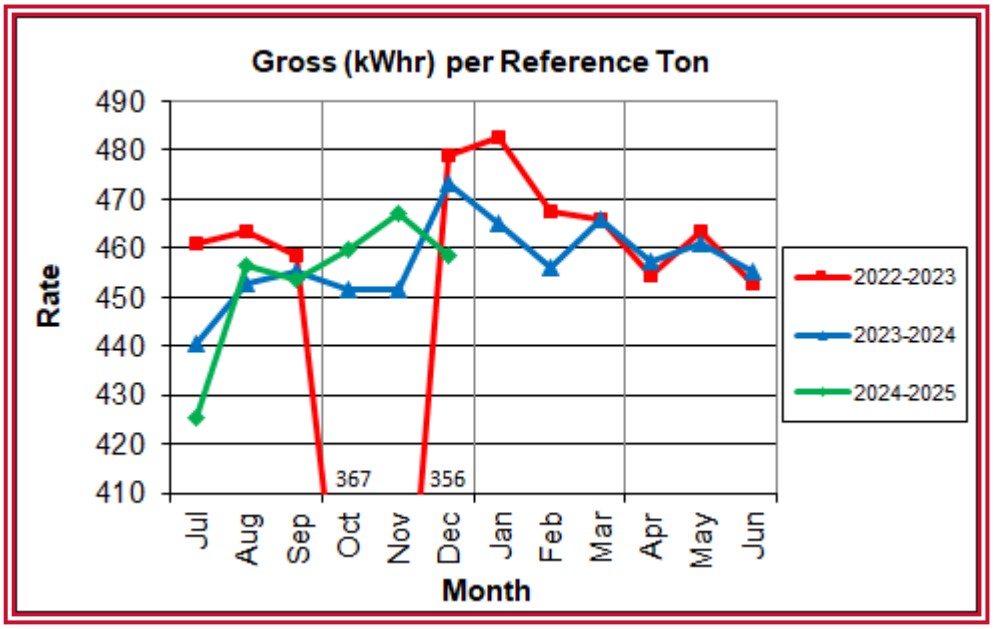
As depicted in Table 3 and Chart 9, Q2FY25 total waste delivery was consistent with Q2FY24 and Q2FY23.

Chart 10: Gross Electrical Generation



During Q2FY25, the Facility generated 43,027 MWh (gross) of electricity, an increase (1.8%) compared to the Q2FY24 generation of 42,260 MWh (gross). The increase in gross electrical production is attributable to the increase in steam production (2.6%) but was offset by more (42 hours) turbine generator downtime compared to Q2FY24.

Chart 11: Gross Conversion Rate



As shown in Chart 11, the average gross electrical generation per reference ton of refuse processed during Q2FY25 was 462 kWh per reference ton, which is 0.7% more than the corresponding quarter in FY24 despite more (42 hours) turbine-generator downtime.

Chart 12: Net Conversion Rate

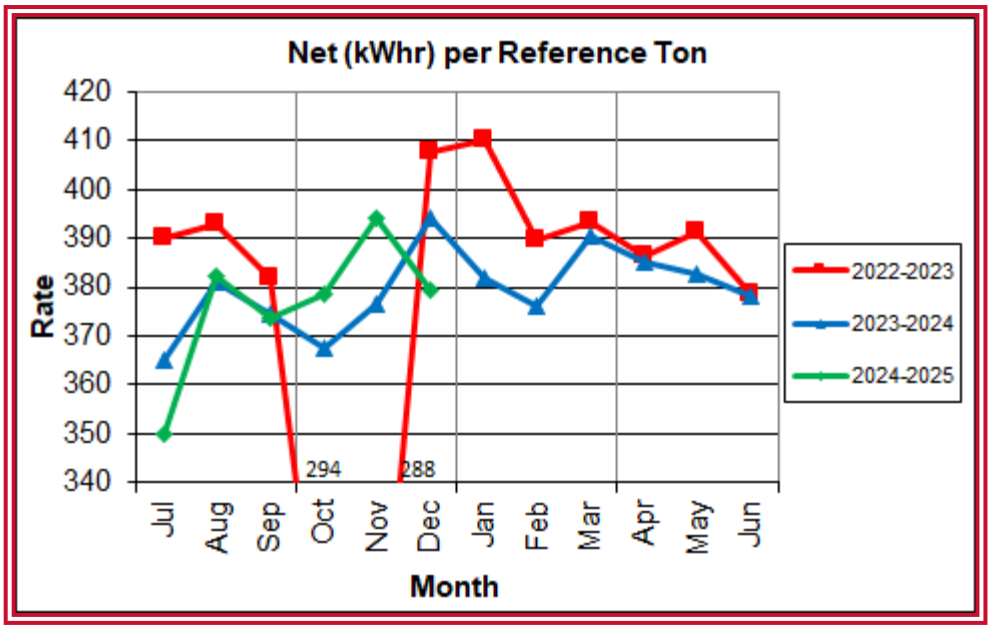


Chart 12 depicts the normalized net power generation (gross minus in-house usage). In Q2FY25, the average net electrical generation per reference ton was 384 kWh per ton, which is 1.2% higher than the corresponding quarter in FY24.

Chart 13: Net Conversion Rate

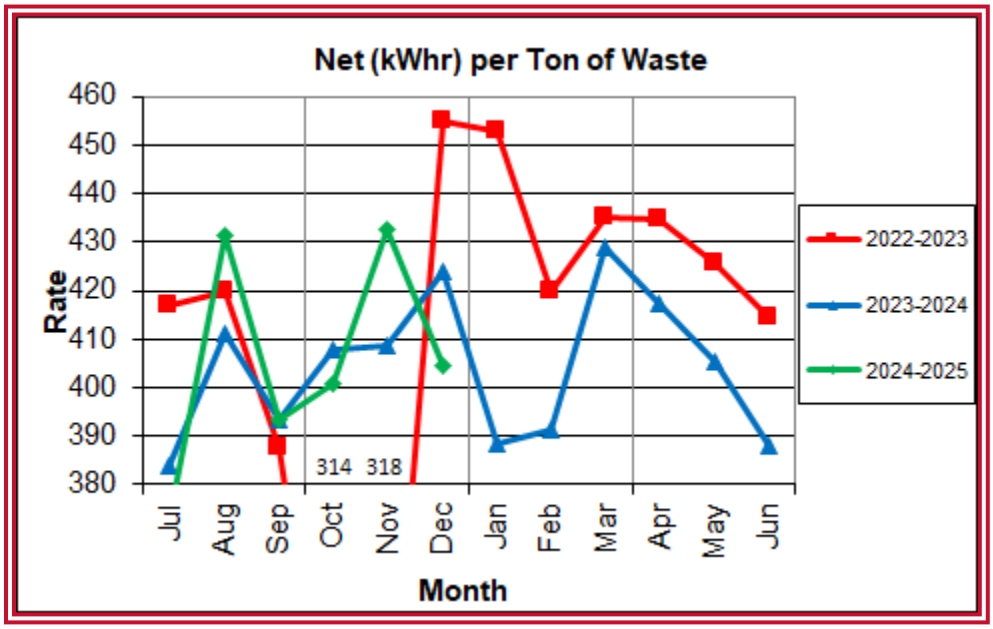


Chart 13 depicts the net power generation per processed ton. The net electrical generation per processed ton in Q2FY25 was 413 kWh per ton, which is slightly less (0.2%) than the corresponding quarter in FY24.

Chart 14: Gross Turbine Generator Conversion Rate

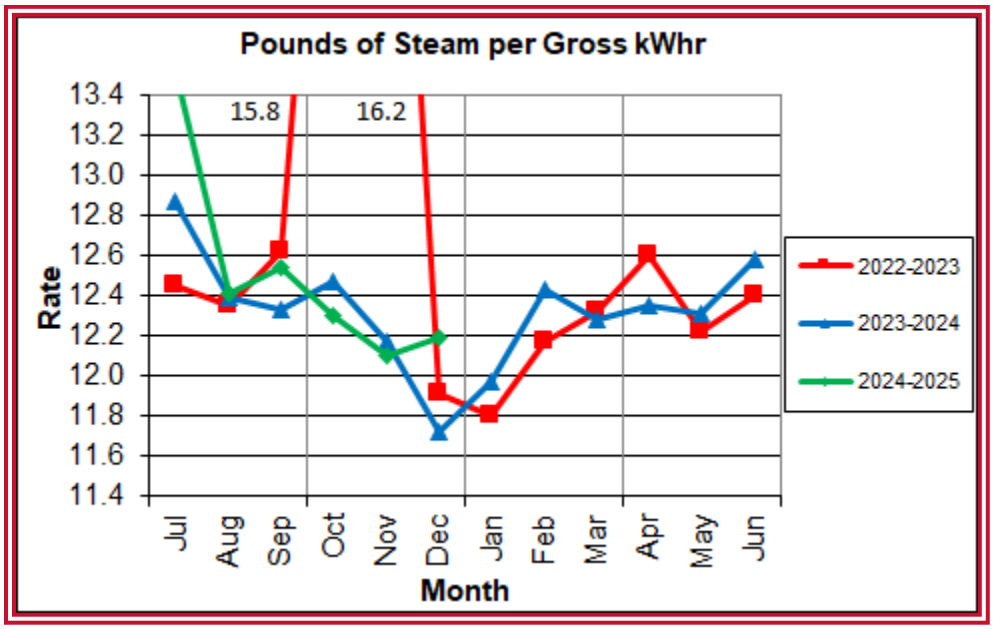


Chart 14 illustrates the quantities of steam required to generate one (1) kWh of electricity. This measure is a turbine generator performance indicator, where lower steam rates indicate superior performance. For simplification, this calculated rate is based on the average for the two turbine generators. In Q2FY25 the average pounds of steam consumed per gross kWh generated was 12.2, which is slightly

higher (0.8%) than the corresponding quarter in FY24. The average main steam temperature during the quarter was 686.7°F, which is 2.2°F lower than the average main steam temperature of the corresponding quarter last fiscal year and 13.3°F lower than design temperature of 700°F. Lower main steam temperature decreases power generation, all other factors being equal.

4.1 Utility and Reagent Consumptions

Table 4: Facility Utility and Reagent Consumptions

Utility	Units	Q2FY25 Total	Q2FY24 Total	Q2FY25 "Per Processed Ton" Consumption	Q2FY24 "Per Processed Ton" Consumption
Fuel Oil	Gal.	13,770	8,040	0.16	0.10
Boiler Make-up	Gal.	1,472,000	1,457,000	16.98	17.24
Cooling Tower Make-up	Gal.	40,334,344	38,616,129	465.20	456.98
Pebble Lime	Lbs.	1,418,000	1,422,000	16.35	16.83
Ammonia	Lbs.	184,000	169,000	2.12	2.00
Carbon	Lbs.	72,000	74,000	0.83	0.88

Fuel oil usage during the quarter represents approximately 0.24% of the total heat input to the boilers, which compares favorably with industry averages; however, is more than the 0.15% of total heat input in Q2FY24. Fuel oil is used to stabilize combustion of wet fuel, as well as during start-up and shutdown of the boilers for maintenance. Boiler makeup water usage during the quarter represents 2.3% of steam flow, which is slightly lower than the boiler makeup in Q2FY24 which was 2.4% of steam flow. Higher boiler makeup quantities are indicative of increased steam leakage.

In comparing Q2FY25 to Q2FY24 on a per processed ton consumption basis:

- The total fuel oil consumption rate was 71.3% higher
- The boiler make-up water consumption rate was 1% higher
- The cooling tower make-up water consumption rate was 4.4% higher
- The total pebble lime consumption rate was 0.3% lower
- The ammonia consumption rate was 8.9% higher
- The carbon consumption rate was 2.7% lower

The increase in fuel oil consumption is attributable to the increase in number of outages (10 outages) in Q2FY25 compared to the number of outages (four (4) outages) in Q2FY24.

4.2 Safety & Environmental Training

The Facility experienced no OSHA recordable accidents or First Aid Accidents during Q2FY25. RAAI has operated 98 days without an OSHA recordable accident as of December 31, 2024. Safety trainings were conducted during the quarter with themes as follows:

October 2024

- Safety: Portable Fire Extinguishers

November 2024

- Safety: Hazard Communication

December 2024

- Safety: Lead and Heavy Metals

5.0 Facility Maintenance

Throughout the quarter, regular routine and preventative maintenance was performed. HDR considers that the Facility is implementing an effective maintenance regimen, and is performing routine and preventative maintenance, along with selected equipment replacements in a timely manner. RAAI monthly maintenance reports provide a detailed account of maintenance performed.

In addition to the scheduled major outage on Unit 1, RAAI reports that 725 preventative maintenance actions were completed during the quarter.

5.1 Availability

Facility availabilities for Q2FY25 are shown in Table 5. According to RAAI reports, the average availability for Boiler Nos. 1, 2, and 3 for Q2FY25 was 90.6%, 97.2%, and 96.0%, respectively. The three-boiler average availability during the quarter was 94.6%, which is comparable to industry standard averages.

According to RAAI reports, the average availability for Turbine Generator 1 and 2 for Q2FY25 was 91.8% and 100%, respectively. Note that 105.1 hours of standby time experienced by both turbine generators during the quarter does not factor into overall availability.

Table 5: Quarterly Facility Unit Availabilities

Availability	Q1FY25 Average	Q2FY25 Average
Boiler No. 1	96.6%	90.6%
Boiler No. 2	93.4%	97.2%
Boiler No. 3	95.4%	96.0%
Avg.	***95.2%***	***94.6%***
Turbine No. 1	90.9%	91.8%
Turbine No. 2	99.3%	100.0%
Avg.	***95.1%***	***95.9%***

Table 6: Boiler Downtime – Q2FY25

Boiler Number	Outage Begin Date	Outage End Date	Hours Unavailable	Downtime Classification	Reason Unavailable
1	10/11/24	10/20/24	197.6	Scheduled	Major Scheduled Outage
3	10/25/24	10/27/24	40.8	Unscheduled	Economizer Tube Leak
2	11/17/24	11/17/24	2.0	Unscheduled	Stoker Issues
3	11/30/24	12/2/24	40.6	Unscheduled	Grate Bar Failures
1	12/7/24	12/8/24	21.2	Standby	Utility Ordered Outage
2	12/7/24	12/9/24	28.5	Standby	Utility Ordered Outage
3	12/7/24	12/8/24	23.8	Standby	Utility Ordered Outage
2	12/19/24	12/21/24	61.2	Unscheduled	Waterwall Tube Leak
1	12/25/24	12/26/24	11.3	Unscheduled	Residue Main Vibrating Pan Failure
3	12/25/24	12/26/24	7.3	Unscheduled	Residue Main Vibrating Pan Failure
Total Unscheduled Downtime				**163.2 Hours**	
Total Scheduled Downtime				**197.6 Hours**	
Total Standby Downtime				**73.5 Hours**	
Total Downtime				**434.3 Hours**	

Table 7: Turbine Generator Downtime – Q2FY25

Turbine Generator Number	Outage Begin Date	Outage End Date	Hours Unavailable	Downtime Classification	Reason Unavailable
1	10/11/24	10/12/24	48.0	Standby	Boiler Outage – Lack of Steam
1	10/13/24	10/18/24	116.3	Scheduled	Scheduled Minor Outage
1	12/7/24	12/8/24	26.5	Standby	Utility Order Outage
1	12/9/24	12/11/24	67.5	Unscheduled	Turbine Governor Control Sticking
2	12/7/24	12/8/24	21.2	Standby	Utility Ordered Outage
2	12/25/24	12/26/24	9.4	Standby	Boiler Outage – Lack of Steam
Total Unscheduled Downtime			**67.5 Hours**		
Total Scheduled Downtime			**116.3 Hours**		
Total Standby Downtime			**105.1 Hours**		
Total Downtime			**288.9 Hours**		

5.2 Facility Housekeeping

RAAI is performing Facility housekeeping and maintaining plant cleanliness in accordance with acceptable industry practices. A site walkdown was conducted in December 2024. At the time of the walkdown, no new deficiencies were recorded, and prior deficiencies were given a status update. Photos of interest from the walkdown are depicted in Appendix B. The Facility housekeeping ratings from the December 2024 walkdown are presented in Table 8.

Table 8: Facility Housekeeping Ratings – December 2024

Facility Area	Acceptable	Needs Improvement	Unacceptable
Tipping Floor	√		
Citizen's Drop-off Area	√		
Tipping Floor Truck Exit	√		
Front Parking Lot	√		
Rear Parking Lot	√		
Boiler House Pump Room	√		
Lime Slurry Pump Room	√		
Switchgear Area	√		
Ash Load-out Area	√		
Vibrating Conveyor Area	√		
Ash Discharger Area	√		
Cooling Tower Area	√		
Truck Scale Area	√		
SDA/FF Conveyor Area	√		
SDA Penthouses	√		
Lime Preparation Area	√		
Boiler Drum Levels	√		
Turbine Room	√		
Electrical Room	√		

6.0 Environmental

The air pollution control equipment-maintained emission concentrations well within the established regulations. Average Continuous Emission Monitoring System (CEMS) data collected for each monthly period during Q2FY25 are summarized in Appendix A. The Facility experienced no permit deviations during Q2FY25. As of December 31, 2024, the Facility has operated 173 days without an environmental excursion.

6.1 Nitrogen Oxide Emissions

During Q2FY25, the monthly emission concentrations of nitrogen oxides (NO_x) averaged 87.0 ppm, 87.0 ppm, and 86.7 ppm for Boiler Nos. 1, 2, and 3, respectively. All stack NO_X concentrations remain below the permit limit (110 ppm, 24-hr average, @ 7% O_2). In comparing Q2FY25 to the corresponding quarter last year, ammonia usage increased by 8.9%. HDR continues to track the trends after the full implementation of the LN system in FY23, and overall historically average levels of ammonia are being used in order to control NO_x emissions to the permit limit

6.2 Sulfur Dioxide Emissions

During Q2FY25 the monthly emission concentration of stack sulfur dioxide (SO_2) averaged 1.0 ppm, 0.3 ppm, and 1.3 ppm for Boiler Nos. 1, 2, and 3, respectively. All these stack SO_2 concentrations are significantly below the permit limit of 29 ppm @ 7% O_2.

6.3 Carbon Monoxide Emissions

During Q2FY25, the monthly average CO emission concentrations on Boiler Nos. 1, 2, and 3 were 27.0 ppm, 23.7 ppm, and 21.0 ppm, respectively, and all are well within permit limits (100 ppmdv, 4-hour average).

6.4 Opacity

During Q2FY25, the average opacity on Boiler Nos. 1, 2, and 3 were 0.2%, 0.8%, and 1.5%, respectively, which are all significantly below the 10% (6-minute) average permit limit.

6.5 Daily Emissions Data

Appendix A, Tables 10, 11, and 12 tabulate the monthly average, maximum, and minimum emissions data for each unit during Q2FY25. Excursions appear in bold print. It should be noted that these tabulations of monthly averages, reported here for informational purposes, are based on tabulations of daily averages. These averages do not correlate with official reports to the regulatory agencies because of differences in averaging times and other technical differences required by agency report formats.

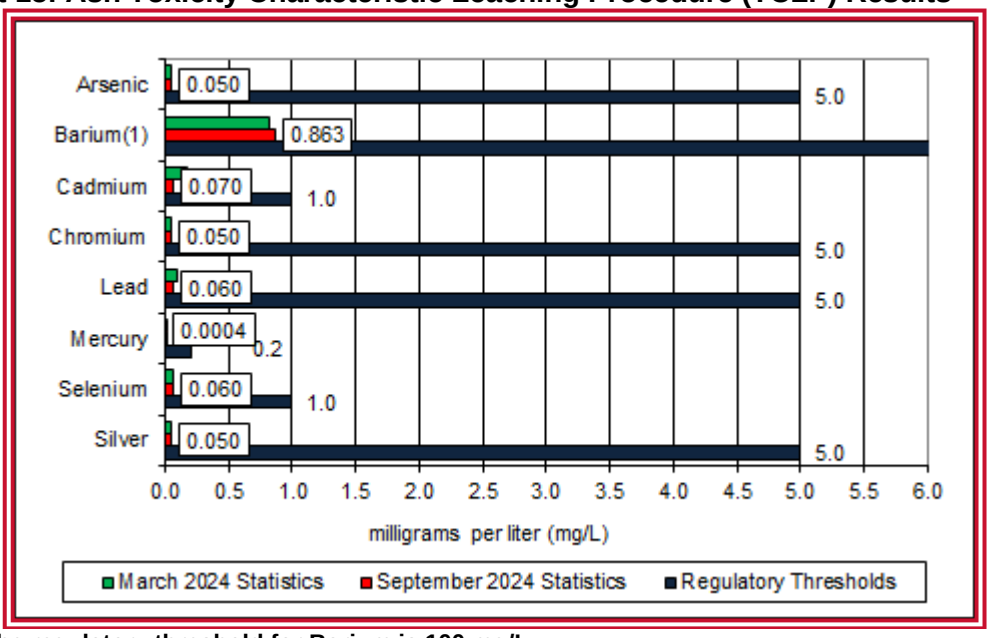
6.6 Ash System Compliance

Results from the TCLP testing conducted in March 2024 and September 2024 are depicted in Table 9 and Chart 15 below. RAAI continued to sample ash monthly in-house, and document pH readings and adjust lime feed rate as needed. The results for the in-house ash pH tests are depicted below in Chart 16 where each quarter is represented by the average of the respective monthly readings. In Q2FY25, the average ash pH for in-house tests was 9.5, which is in the target range of 8 to 11.

Table 9: Comparison of Statistical Results and Regulatory Thresholds for Metal Analytes

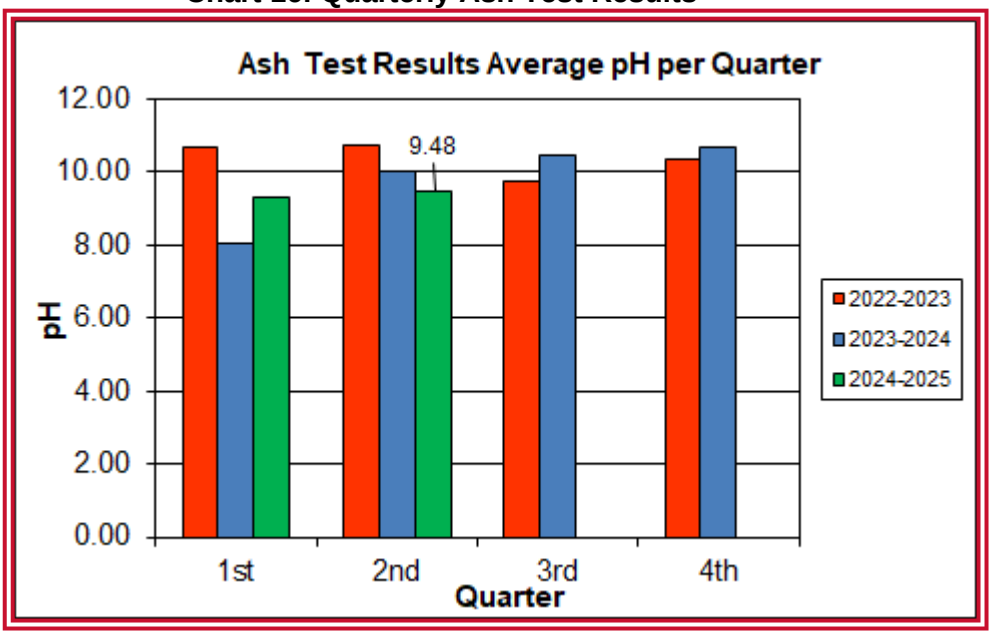
Metals	90% Upper Confidence (March 2024)	90% Upper Confidence (Sept 2024)	Regulatory Threshold (mg/L)	% of Threshold (March 2024)	% of Threshold (Sept 2024)
Arsenic	0.050	0.050	5.0	1.0%	1.0%
Barium	0.818	0.863	100.0	0.8%	0.9%
Cadmium	0.170	0.070	1.0	17.0%	7.0%
Chromium	0.050	0.050	5.0	1.0%	1.0%
Lead	0.100	0.060	5.0	2.0%	1.2%
Mercury	0.0004	0.0004	0.2	0.2%	0.2%
Selenium	0.060	0.060	1.0	6.0%	6.0%
Silver	0.050	0.050	5.0	1.0%	1.0%

Chart 15: Ash Toxicity Characteristic Leaching Procedure (TCLP) Results



Note: The regulatory threshold for Barium is 100 mg/L

Chart 16: Quarterly Ash Test Results



APPENDIX A
FACILITY CEMS DATA

Table 10: Boiler No. 1 Monthly Summary for Reportable Emissions Data

Group#-Channel#		G8-C35	G8-C28	G8-C8	G8-C4	G8-C12	G8-C34	G8-C37	G8-C40	G8-C39
Long Descrip.		U-1 Steam	U-1 Econ	U-1 Stack	U-1 Stack	U-1 Stack	U-1 Opaci	U-1 FF In	U-1 Carbo	U-1 Lime
Short Descrip.		SteamFl	SO_2ec	SO_2sc	COsc	NO_xsc	Opacity	FF InTemp	CarbInj	LimeFlow
Units		K#/Hr	ppmc	ppm	ppmc	ppmc	%	deg F	#/hr	gpm
Range		0-100	0-2000	0-500	0-4000	0-1000	0-100	100-500	0-50	0-20
Oct – 24	AVG	80.2	39.0	2.0	22.0	87.0	0.2	298.0	11.4	3.4
	Max	90.1	84.0	8.0	8.0	92.0	0.5	298.0	11.4	4.0
	Min	70.6	7.0	0.0	0.0	84.0	0.0	297.0	11.3	2.7
Nov – 24	AVG	87.6	38.0	0.0	29.0	87.0	0.1	298.0	11.3	3.4
	Max	91.9	58.0	1.0	44.0	91.0	0.4	299.0	11.7	3.7
	Min	78.1	19.0	0.0	15.0	84.0	0.0	298.0	11.3	3.0
Dec - 24	AVG	88.5	21.0	1.0	30.0	87.0	0.2	298.0	11.3	3.4
	Max	93.2	37.0	7.0	58.0	91.0	0.4	299.0	11.6	4.0
	Min	69.9	10.0	0.0	0.0	79.0	0.0	298.0	11.3	2.2
Quarter Average		85.4	0.0	1.0	27.0	87.0	0.2	298.0	11.3	3.4
Quarter Max Value		93.2	84.0	8.0	58.0	92.0	0.5	299.0	11.7	4.0
Quarter Min Value		69.9	7.0	0.0	0.0	79.0	0.0	297.0	11.3	2.2
Limits:		99	NA	29	100	110	10	331	12(a)	

(a) Carbon flow limit is a minimum value
(b) Limit for NOx is based on an average daily limit

* Note: The data reported herein represent 24-hour average data for all parameters. Emissions excursions that are measured on shorter time intervals (i.e., 4-hour block averages for CO) do not correlate with the 24-hour average data reported above.

Table 11: Boiler No. 2 Monthly Summary for Reportable Emissions Data

Group#-Channel#		G8-C35	G8-C28	G8-C8	G8-C4	G8-C12	G8-C34	G8-C37	G8-C40	G8-C39
Long Descrip.		U-2 Steam	U-2 Econ	U-2 Stack	U-2 Stack	U-2 Stack	U-2 Opaci	U-2 FF In	U-2 Carbo	U-2 Lime
Short Descrip.		SteamFl	SO_2ec	SO_2sc	COsc	NO_xsc	Opacity	FF InTemp	CarbInj	LimeFlow
Units		K#/Hr	ppmc	ppm	ppmc	ppmc	%	deg F	#/hr	gpm
Range		0-100	0-2000	0-500	0-4000	0-1000	0-100	100-500	0-50	0-20
Oct – 24	AVG	80.7	32.0	0.0	19.0	87.0	0.8	299.0	11.3	3.3
	Max	88.6	49.0	0.0	31.0	90.0	1.2	300.0	11.4	3.8
	Min	69.9	15.0	0.0	10.0	86.0	0.5	297.0	11.2	2.8
Nov – 24	AVG	86.4	22.0	0.0	22.0	89.0	0.8	299.0	11.3	3.4
	Max	90.8	32.0	0.0	38.0	90.0	1.2	300.0	11.7	3.7
	Min	76.9	13.0	0.0	10.0	86.0	0.5	299.0	11.1	3.0
Dec - 24	AVG	85.5	35.0	1.0	30.0	85.0	0.8	300.0	11.3	3.3
	Max	93.6	63.0	5.0	47.0	88.0	1.3	301.0	11.5	4.1
	Min	69.9	15.0	0.0	15.0	83.0	0.1	298.0	11.2	1.9
Quarter Average		84.2	29.7	0.3	23.7	87.0	0.8	299.3	11.3	3.3
Quarter Max Value		93.6	63.0	5.0	47.0	90.0	1.3	301.0	11.7	4.1
Quarter Min Value		69.9	13.0	0.0	10.0	83.0	0.1	297.0	11.1	1.9
Limits:		98	NA	29	100	110	10	330	12(a)	

(a) Carbon flow limit is a minimum value
(b) Limit for NOx is based on an average daily limit

* Note: The data reported herein represent 24-hour average data for all parameters. Emissions excursions that are measured on shorter time intervals (i.e., 4-hour block averages for CO) do not correlate with the 24-hour average data reported above.

Table 12: Boiler No. 3 Monthly Summary for Reportable Emissions Data

Group#-Channel#		G8-C35	G8-C28	G8-C8	G8-C4	G8-C12	G8-C34	G8-C37	G8-C40	G8-C39
Long Descrip.		U-3 Steam	U-3 Econ	U-3 Stack	U-3 Stack	U-3 Stack	U-3 Opaci	U-3 FF In	U-3 Carbo	U-3 Lime
Short Descrip.		SteamFl	SO_2ec	SO_2sc	COsc	NO_xsc	Opacity	FF InTemp	CarbInj	LimeFlow
Units		K#/Hr	ppmc	ppm	ppmc	ppmc	%	deg F	#/hr	gpm
Range		0-100	0-2000	0-500	0-4000	0-1000	0-100	100-500	0-50	0-20
Oct – 24	AVG	78.8	29.0	1.0	18.0	88.0	1.5	299.0	11.2	3.6
	Max	87.3	44.0	6.0	26.0	89.0	1.7	299.0	11.5	4.0
	Min	67.6	19.0	0.0	11.0	86.0	1.2	298.0	11.2	3.0
Nov – 24	AVG	84.5	25.0	1.0	17.0	86.0	1.7	299.0	11.3	3.6
	Max	90.6	39.0	6.0	30.0	91.0	2.1	299.0	11.6	3.9
	Min	72.7	0.0	0.0	3.0	84.0	1.3	296.0	11.1	3.2
Dec - 24	AVG	86.7	29.0	2.0	28.0	86.0	1.4	299.0	11.3	3.7
	Max	92.2	51.0	11.0	47.0	90.0	2.0	302.0	11.7	4.8
	Min	69.0	13.0	0.0	16.0	68.0	0.8	298.0	11.3	2.4
Quarter Average		83.3	27.7	1.3	21.0	86.7	1.5	299.0	11.3	3.6
Quarter Max Value		92.2	51.0	11.0	47.0	91.0	2.1	302.0	11.7	4.8
Quarter Min Value		67.6	0.0	0.0	3.0	68.0	0.8	296.0	11.1	2.4
Limits:		98	NA	29	100	110	10	332	12(a)	

(a) Carbon flow limit is a minimum value
(b) Limit for NOx is based on an average daily limit

* Note: The data reported herein represent 24-hour average data for all parameters. Emissions excursions that are measured on shorter time intervals (i.e., 4-hour block averages for CO) do not correlate with the 24-hour average data reported above.

APPENDIX B
SITE PHOTOS - December 2024

Figure 1: Back-up transformer on-site

Figure 2: Cooling water tower appears to have some uneven flows. Deficiency Number 10.

Figure 3: Carbon Silo observed to be in good condition

Figure 4: Resident non-metal drop off container

Figure 5: Ash canopy observed to be in good condition

Figure 6: North side of Facility estimated to be 50% pressure washed

Figure 7: Riddling Chute Plenum Components

Figure 8: Spare Induced Draft Fan Rotors

Figure 9: New Entrance Gate

Figure 10: Tipping floor and hall observed to be in fair condition

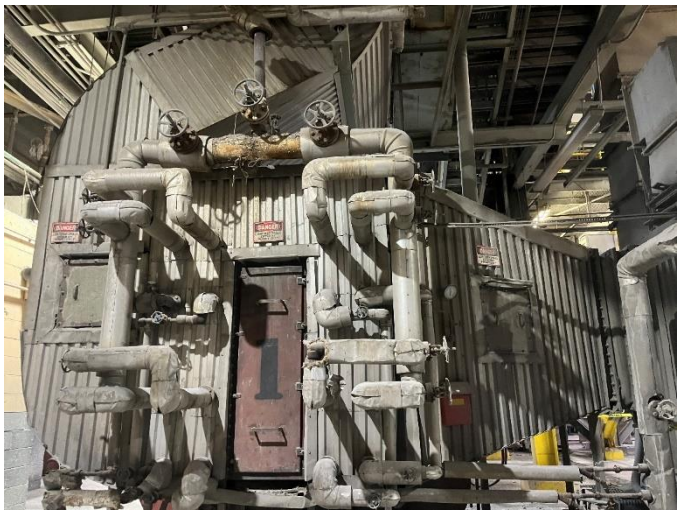


Figure 11: Unit 1 forced draft fan and under fire air coils

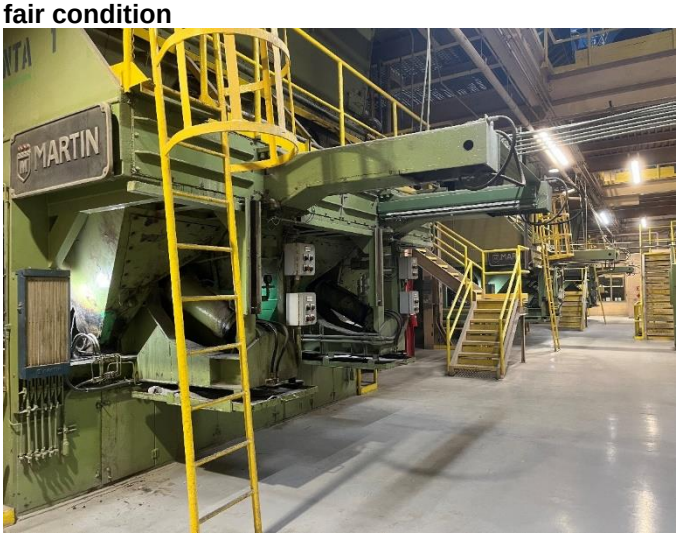


Figure 12: Firing Aisle - General Observation

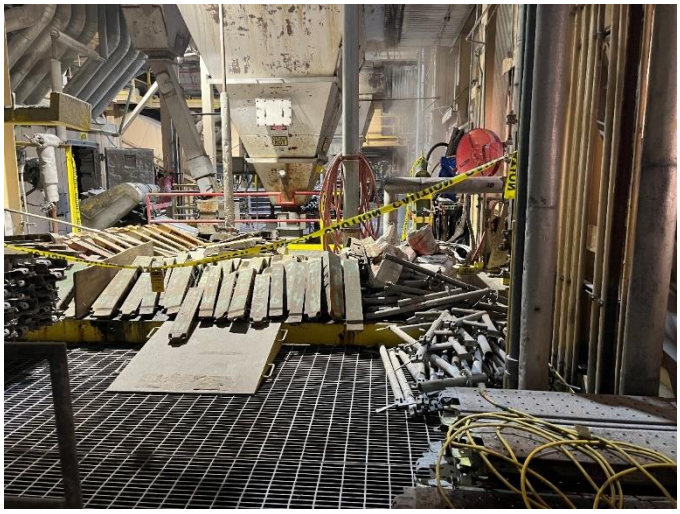


Figure 13: New grate bars prior to installation during Unit 3 Major Outage

Figure 14: Ferrous Drum Magnet in operation

Figure 15: Unit 1 side walls of feed chute in poor condition

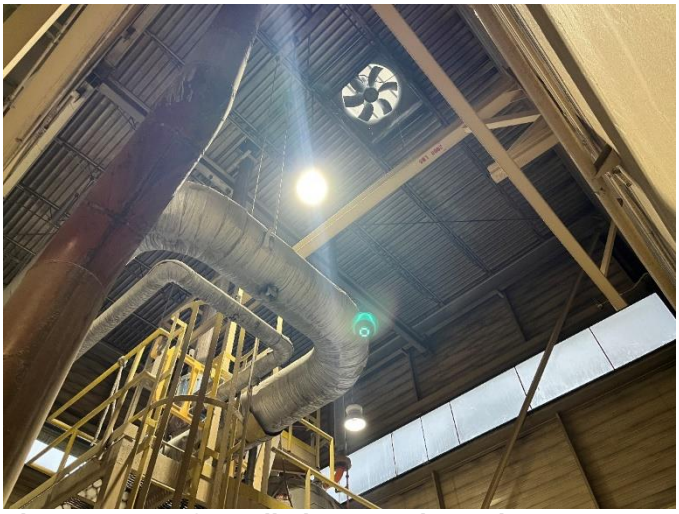


Figure 16: Roof Ventilation Fan above deaerator not operating. Deficiency Number 23.

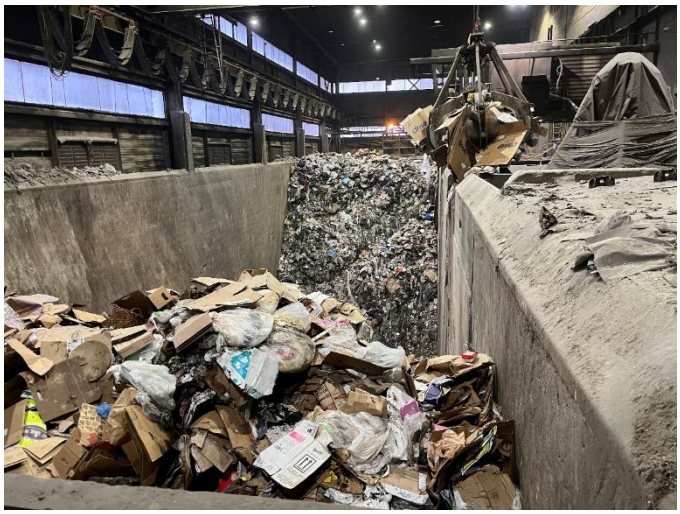


Figure 17: Refuse Pit

Figure 18: Unit 3 Lagging in poor condition in multiple locations at various elevations

Figure 19: Cooling Tower Deck cleared of material

Figure 20: Recently painted Lime Slurry Pipes in SDA Penthouse No. 1

Figure 21: Unit 3 baghouse area in good condition

Figure 22: Unit 1 pulse air jet system

Figure 23: New safety cages installed around dump valves

Figure 24: Hopper Heater Controls set to manual with Low Temperature Indicators on