



# Alexandria Arlington Resource Recovery Facility

Fiscal Year 2026 First Quarter Operations Report

November 2025

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#### **Definition of Abbreviations & Acronyms**

Abbreviation/Acronym Definition

APC Air Pollution Control

April Aug August Avg Average

BCU Boiler Capacity Utilization
Btu British thermal unit

CEMS Continuous Emissions Monitoring System

CO Carbon Monoxide
Dec December
Feb February

FMG Facility Monitoring Group

FY Fiscal Year gal Gallon

HCI Hydrochloric (Hydrogen Chlorides)

HDR HDR Engineering Inc

HHV Estimated Waste Heating Value (Btu/lb)

IDInduced DraftJanJanuaryJulJulyJunJune

klbs Kilo-pounds (1,000 lbs)

kWh Kilowatt hours (1,000 watt-hours)

IbsPoundsMarMarchMaxMaximumMayMayMinMinimum

MSW Municipal Solid Waste MWh Megawatt hours

No Number

 $\begin{array}{ccc} \text{NOV} & & \text{Notice of Violation} \\ \text{Nov} & & \text{November} \\ \text{NO}_x & & \text{Nitrogen Oxide} \\ \end{array}$ 

Oct October

OSHA Occupational Safety and Health Administration

ppm Parts per million

ppmdv Parts per million dry volume

Q1 First Quarter
Q2 Second Quarter
Q3 Third Quarter
Q4 Fourth Quarter

RAAI Reworld Alexandria Arlington, Inc.

SDA Spray Dryer Absorber

 $\begin{array}{ccc} \text{Sep} & & \text{September} \\ \text{SO}_2 & & \text{Sulfur Dioxide} \end{array}$ 

TCLP Toxicity Characteristic Leaching Procedure VADEQ Virginia Department of Environmental Quality

yr Year YTD Year to date

### Alexandria/Arlington Waste-to-Energy Facility First Quarter Operations Report – Fiscal Year 2026

#### 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 2026 Fiscal Year. This report is prepared for the first quarter of the 2026 Fiscal Year and summarizes Facility operations between July 1, 2025, and September 30, 2025. This report identifies the fiscal year beginning on July 1, 2025, as FY26 and the quarter beginning on July 1, 2025, as Q1FY26.

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 Q1FY26. The operation of the Facility, maintenance, safety, and overall cleanliness continue to be above average. The Facility experienced no environmental permit deviations throughout Q1FY26.

During Q1FY26, the boilers experienced three (3) instances of scheduled downtime totaling 242.8 hours, nine (9) instances of unscheduled downtime totaling 90.4 hours and two (2) instances of standby downtime totaling 145.5 hours. The turbine generators experienced three (3) instances of unscheduled downtime totaling 23.4 hours during the quarter and one (1) instance of standby time totaling 48.0 hours. A detailed listing of downtime is provided in Section 4.1 of this report.

Typical waste processed during the quarter was 965.2 tons per day, or 99.0% of nominal facility capacity which compares very favorably to industry averages.

Waste deliveries averaged 931.6 tons per day, which is lower (3.5%) than the burn rate.

Compared to the corresponding quarter in FY25, during Q1FY26 MSW processed was nearly identical (less than 0.1% lower), steam production decreased (4.0%), and electricity generated (gross) decreased (3.1%). The decrease in steam production was attributable to more (185 hours) offline time (unscheduled, scheduled and standby time) experienced by the boilers, as well as lower (2.5%) waste heating value, compared to Q1FY25. The decrease in electrical generation was attributable to the decrease in steam production offset by less (196.1 hours) turbine generator downtime.

#### 3.0 Facility Inspection and Records Review

In October 2025, 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, but is not limited to 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**

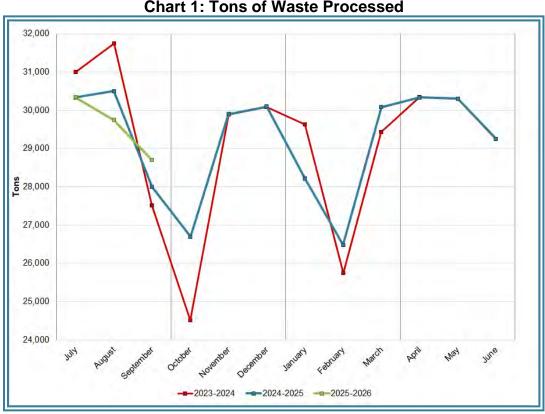
\*A is highest priority & demands immediate attention: B needs attention but is not urgent; C can be addressed at earliest opportunity & is not urgent.

| Item No. | Inspection Report Deficiencies  | Issue Reported | Priority* | HDR Recommendation   | Status                                   | Open / Closed |
|----------|---|----------------|-----------|--|--|---------------|
| 1        | Pavement spider-cracking at Tipping Floor Entrance  | November 2016  | С         | Resurface section of pavement at Tipping Floor Entrance  | Status Unchanged                         | Open          |
| 2        | SDA Penthouse No. 3 Door deteriorated at base   | November 2017  | С         | Patch and Paint Door – Replace if necessary  | Status Unchanged                         | Open          |
| 3        | Deterioration on floor and wall behind lime slurry piping in SDA Penthouse No. 2  | August 2019    | С         | Conduct painting preservation measures   | Status Unchanged                         | Open          |
| 4        | Siding deteriorated beneath Baghouse No. 3 Hoppers  | August 2019    | С         | Replace siding   | Status Unchanged                         | Open          |
| 5        | Siding deteriorated on the north side of Baghouse No. 2   | February 2020  | С         | Replace siding and conduct painting preservation measures  | Status Unchanged                         | Open          |
| 6        | Damaged/Missing insulation and lagging throughout Facility  | August 2020    | С         | 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  | С         | Replace insulation and lagging   | Status Unchanged                         | Open          |
| 8        | Baghouse hopper heaters set to manual; heater off but signaling low temperature.  | February 2021  | В         | Repair hopper heaters  | Status Unchanged                         | Open          |
| 9        | Feed Chute Cooling Jacket Water Level<br>Reservoirs (typical of 2) empty on Boilers No. 1   | May 2021       | В         | 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    | С         | Repair nozzle  | Nozzle flows appear even                 | Closed        |
| 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  | В         | Consider a permanent pump installation in lieu of temporary.   | Status Unchanged                         | Open          |
| 12       | Siding and windows missing on the east side (near the Tipping Floor entrance).  | May 2023       | С         | Repair/Replace siding.   | New windows installed                    | Closed        |
| 13       | Grounding wire not secured on southwest corner of Cooling Tower.  | May 2023       | В         | Repair grounding wire.   | Wire secured                             | Closed        |
| 14       | Steam leak identified West side of Boiler No. 2 at auxiliary burner elevation   | August 2024    | В         | Repair leak  | Leak repaired – Refer<br>to Figure 17    | Closed        |
| 15       | Insulation missing around main steam isolation valve on Boiler No. 3.   | August 2024    | С         | Replace Insulation   | Insulation Added –<br>Refer to Figure 18 | Closed        |
| 16       | Cooling Tower siding deteriorated   | August 2024    | С         | Repair siding  | Siding all intact                        | Closed        |
| 17       | Circulating Water Pump Housing corroded   | August 2024    | С         | Replace housing  | Status Unchanged                         | Open          |
| 18       | Roof ventilation fan not operating above deaerator  | August 2024    | С         | Repair fan   | Status Unchanged                         | Open          |

| Item No. | Inspection Report Deficiencies   | Issue Reported | Priority* | HDR Recommendation  | Status  | Open / Closed |
|----------|--|----------------|-----------|---|---|---------------|
| 19       | Refractory damaged around G9B-11 sootblower on Boiler No. 1                                  | August 2024    | С         | Repair Refractory   | Status Unchanged –<br>Refer to Figure 15                  | Open          |
| 20       | Minor leak on Boiler No. 1 external piping at LN Nozzle elevation                            | October 2024   | С         | Repair Leak   | Leak repaired – Refer to Figure 16                        | Closed        |
| 21       | Penthouse lights are out of service over Boiler No.  | October 2024   | С         | Repair Lighting   | Lights in service -<br>Refer to Figure 20                 | Closed        |
| 22       | Boiler No. 1 side wall of feed chute corroded/deteriorated                                   | December 2024  | В         | Repair feedchute and perform painting preservation measures | Status Unchanged  | Open          |
| 23       | Sootblower seal air disconnected on Boiler No. 2 IK-09                                       | April 2025     | В         | Repair connection   | All seal air lines<br>connected on Boiler<br>No. 2        | Closed        |
| 24       | Sootblower seal air disconnected on Boiler No. 3 G9-B09                                      | April 2025     | В         | Repair connection   | Changed to Boiler No.<br>3 G9B-09 – Refer to<br>Figure 19 | Open          |
| 25       | Boiler No. 3 feed chute deteriorated with visible holes                                      | April 2025     | В         | Patch holes and perform painting preservation measures      | Status Unchanged  | Open          |
| 26       | Entrance signage knocked over/covered with residential waste                                 | June 2025      | С         | Fix signage with sturdier option                            | Moved further away from driveway                          | Closed        |
| 28       | Air leaking from hydraulics on Boiler No. 2<br>Superheater double dump valves                | June 2025      | С         | Repair air connections                                      | Status Unchanged  | Open          |
| 29       | Insulation damaged from hanger on external steam line near Boiler No. 3 economizer rear wall | June 2025      | С         | Repair hanger support and fix insulation on pipe.           | Status Unchanged  | Open          |
| 30       | External Tube Leak on Boiler No. 3 right wall  | June 2025      | В         | Repair tube leak  | Repaired  | Closed        |
| 31       | Unit 1 Lower Lime Silo with significant corrosion  | October 2025   | В         | Repair flooring   | New – Refer to Figure<br>26                               | Open          |

#### 3.1 **Facility Performance**

Monthly operating data provided by RAAI indicates that 88,794 tons of MSW were processed during Q1FY26, and a total of 85,705 tons of MSW including 1,486 tons of Special Handling Waste (1.7% by weight) were received. Total ash production during the quarter was 16,912 tons, which represents 19.0% of the waste processed. The average uncorrected steam production rate for Q1FY26 was 2.97 tonssteam/tonwaste, which is lower (4.0%) than the corresponding quarter and attributable to lower (2.5%) HHV.



**Chart 1: Tons of Waste Processed** 

Chart 1 illustrates that Q1FY26 waste processed was comparable (less than 0.1%) to the corresponding quarter in FY25. RAAI reported that 685 tipping floor/MSW internal inspections were performed during the quarter, and no notices of violation (NOVs) were issued.

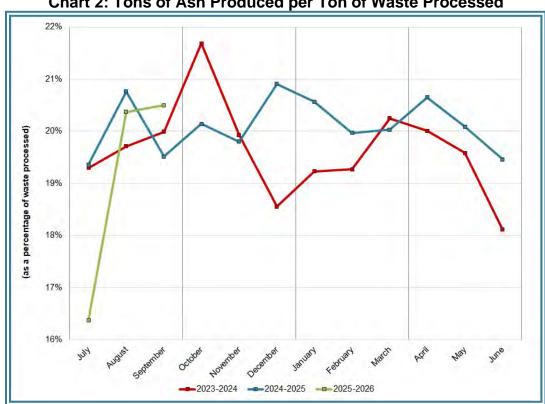


Chart 2: Tons of Ash Produced per Ton of Waste Processed

Chart 2 illustrates that the average ash production rate in Q1FY26 decreased 0.9 percentage points to 19.0% of processed waste compared to the corresponding quarter in FY25 when the rate was 19.9%.

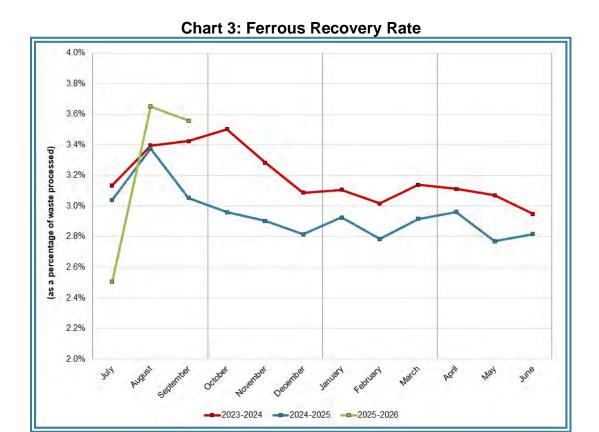
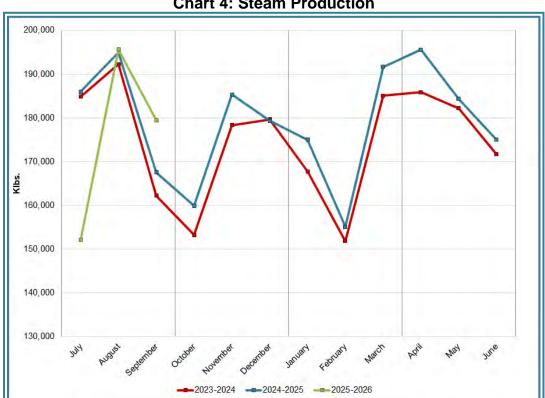
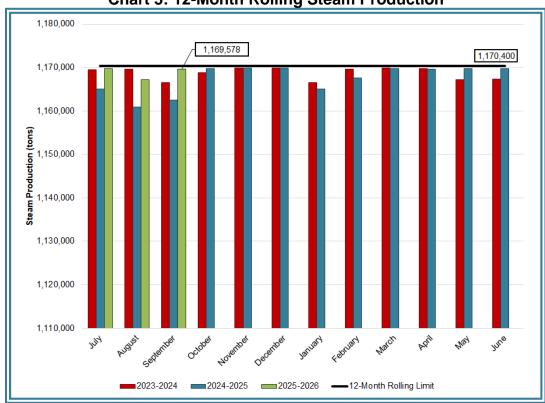


Chart 3 depicts the monthly ferrous metal recovery rate as a percentage of processed MSW tonnage. In Q1FY26, 2,867 tons of ferrous metals were recovered, which is 2.1% higher than the corresponding quarter in FY25. Despite July having a 3-year low recovery rate, Chart 3 illustrates that the ferrous recovery rate overall in Q1FY26 was comparable, at 3.2%, to the corresponding quarter in FY25 when the rate was 3.2%.



**Chart 4: Steam Production** 

In Chart 4, the total steam production for Q1FY26 was 527,188 klbs, 4.0% lower than the corresponding quarter in FY25. The decrease in steam production was attributable to more (185 hours) offline time experienced by the Facility in July due to process limitations, paired with a lower (2.5%) HHV.



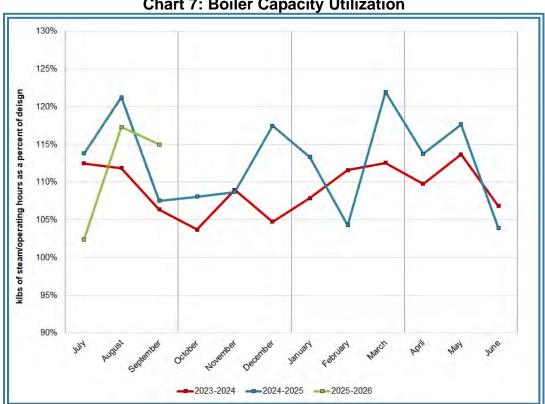
**Chart 5: 12-Month Rolling Steam Production** 

Chart 5 depicts the 12-month rolling steam production for Q1FY26, 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 required Boiler No. 1 and Boiler No. 2 to experience standby time to be able to comply with the 12-month rolling steam production total. The 12-month rolling total for steam production ending in September 2025 was 1,169,578 tons, which is 99.9% of the limit. Chart 5 shows that Facility throughput, and in turn, steam and electricity production are being throttled to stay slightly below the steam production permit limit each month.

**Chart 6: Steam Production Rate** 

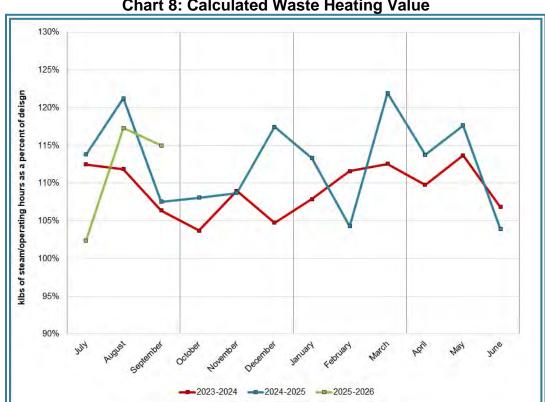


In Chart 6, the conversion of raw waste tonnages into "reference tons" is another way of analyzing steam production and helps to determine whether changes are related to boiler performance or to fuel issues. "Reference tons" are adjusted to account for the calculated average fuel heating value, so that lower BTU fuel raw tonnages are adjusted upwards and vice versa. In Q1FY26, this metric tracked slightly lower at 2.81 tonssteam/tonref compared to the corresponding quarter in FY25 (2.85 tonssteam/tonref).



**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 boilers are online. The BCU during Q1FY26 was 112% compared to the corresponding quarter in FY25 when the BCU was 114%.



**Chart 8: Calculated Waste Heating Value** 

Chart 8 illustrates that Q1FY26 calculated average waste heating value was lower (2.5%) at 4,752 Btu/lb than the corresponding quarter in FY25, which averaged 4,872 Btu/lb. Note that 7.461 inches of precipitation were recorded at Ronald Reagan National Airport during Q1FY26, which is 4.3 inches less than the corresponding quarter in FY25. Typically, as rainfall decreases, HHV increases, and vice versa, which was not the case during the quarter.

<sup>&</sup>lt;sup>1</sup> https://www.wunderground.com/

**Table 2: Quarterly Performance Summaries** 

|        | Month            | Waste<br>Processed<br>(tons) | Waste<br>Diverted<br>(tons) | Ash<br>Shipped<br>(tons) | Special<br>Handling<br>(Supplemental)<br>(tons) | Ferrous<br>Recovered<br>(tons) | Steam<br>Produced<br>(klbs) | Net<br>Electrical<br>Generation<br>(MWh) |
|--------|------------------|------------------------------|-----------------------------|--------------------------|---|--------------------------------|-----------------------------|--|
|        | Quarterly Totals | 90,265                       | 0                           | 17,741                   | 1,923   | 2,992                          | 539,326                     | 35,778                                   |
| Q1FY24 | April-23         | 31,008                       | 0                           | 5,984                    | 692   | 972                            | 184,870                     | 11,908                                   |
| QIF124 | May-23           | 31,745                       | 0                           | 6,257                    | 702   | 1,078                          | 192,261                     | 13,048                                   |
|        | June-23          | 27,512                       | 0                           | 5,500                    | 529   | 942                            | 162,195                     | 10,822                                   |
|        | Quarterly Totals | 88,836                       | 0                           | 17,669                   | 1,282   | 2,807                          | 548,483                     | 35,481                                   |
| Q1FY25 | April-24         | 30,334                       | 0                           | 5,872                    | 453   | 922                            | 185,970                     | 11,311                                   |
| QIF123 | May-24           | 30,501                       | 0                           | 6,332                    | 480   | 1,030                          | 194,941                     | 13,155                                   |
|        | June-24          | 28,001                       | 0                           | 5,465                    | 349   | 855                            | 167,572                     | 11,015                                   |
|        | Quarterly Totals | 88,794                       | 0                           | 16,912                   | 1,486   | 2,867                          | 527,188                     | 35,760                                   |
| Q1FY26 | April-25         | 30,344                       | 0                           | 4,969                    | 560   | 760                            | 152,063                     | 10,694                                   |
| QIF120 | May-25           | 29,752                       | 0                           | 6,060                    | 480   | 1,086                          | 195,636                     | 12,991                                   |
|        | June-25          | 28,698                       | 0                           | 5,883                    | 446   | 1,021                          | 179,489                     | 12,075                                   |
| F      | Y24 Totals       | 349,483                      | 0                           | 68,523                   | 6,596   | 11,118                         | 2,094,885                   | 141,268                                  |
| F      | Y25 Totals       | 350,215                      | 0                           | 70,424                   | 5,900   | 10,312                         | 2,149,566                   | 145,712                                  |
| F      | Y26 Totals       | 88,794                       | 0                           | 16,912                   | 1,486   | 2,867                          | 527,188                     | 35,760                                   |

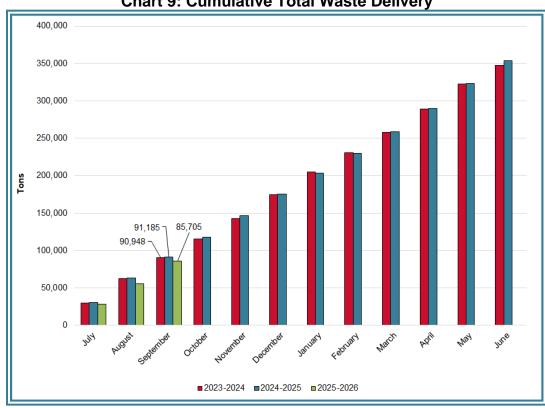
Table 2 presents the production data provided to HDR by RAAI for Q1FY26 on both a monthly and quarterly basis. For purposes of comparison, Q1FY24 and Q1FY25 are shown, as well as FY24, FY25 and FY26 Year-to-Date totals. In comparing quarterly totals, the data shows:

- Nearly identical waste was processed in Q1FY26 compared to Q1FY25, but less than Q1FY24
- Less steam was generated in Q1FY26 than Q1FY25 and Q1FY24
- More electricity (net) was generated in Q1FY26 than Q1FY25, but slightly less than Q1FY24
- More supplemental waste was received in Q1FY26 than Q1FY25, but less than Q1FY24

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.

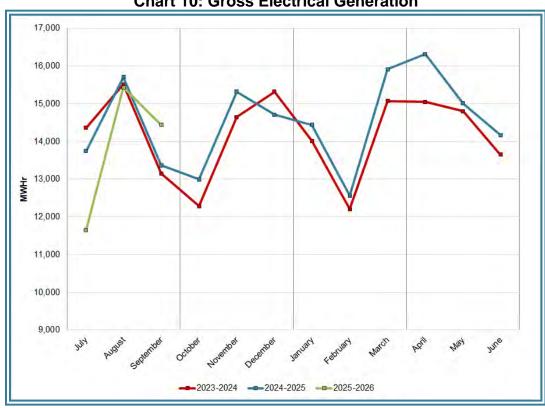
**Table 3: Waste Delivery Classification** 

|      |                       | <u>Jul</u> | Aug        | Sep        | Oct        | Nov        | Dec        | <u>Jan</u> | <u>Feb</u> | <u>Mar</u> | <u>Apr</u> | <u>May</u> | <u>Jun</u> | <u>Totals</u> | % of Total |
|------|-----------------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|---------------|------------|
|      | 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%      |
| 7.   | 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%      |
| FY21 | 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%    |
|      |                       | <u>Jul</u> | <u>Aug</u> | <u>Sep</u> | <u>Oct</u> | Nov        | <u>Dec</u> | <u>Jan</u> | <u>Feb</u> | <u>Mar</u> | <u>Apr</u> | <u>May</u> | <u>Jun</u> | <u>Totals</u> | % of Total |
|      | 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%      |
| 7    | 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%      |
| FY22 | 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%    |
|      |                       | <u>Jul</u> | <u>Aug</u> | <u>Sep</u> | <u>Oct</u> | <u>Nov</u> | <u>Dec</u> | <u>Jan</u> | <u>Feb</u> | <u>Mar</u> | <u>Apr</u> | <u>May</u> | <u>Jun</u> | <u>Totals</u> | % of Total |
|      | 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%      |
| က    | 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%      |
| FY23 | 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%    |
|      |                       | <u>Jul</u> | <u>Aug</u> | <u>Sep</u> | <u>Oct</u> | <u>Nov</u> | <u>Dec</u> | <u>Jan</u> | <u>Feb</u> | <u>Mar</u> | <u>Apr</u> | <u>May</u> | <u>Jun</u> | <u>Totals</u> | % of Total |
|      | 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%      |
| 4    | 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%      |
| FY24 | 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%    |
|      |                       | <u>Jul</u> | <u>Aug</u> | <u>Sep</u> | <u>Oct</u> | <u>Nov</u> | <u>Dec</u> | <u>Jan</u> | <u>Feb</u> | <u>Mar</u> | <u>Apr</u> | <u>May</u> | <u>Jun</u> | <u>Totals</u> | % of Total |
|      | City Waste            | 1,837      | 1,660      | 1,648      | 1,869      | 1,694      | 1,778      | 1,610      | 1,492      | 1,710      | 1,862      | 2,046      | 1,834      | 21,041        | 5.95%      |
| ις;  | County Waste          | 2,640      | 2,738      | 2,619      | 2,946      | 2,611      | 2,715      | 2,549      | 2,205      | 2,305      | 2,394      | 2,628      | 2,552      | 30,902        | 8.73%      |
| FY25 | Municipal Solid Waste | 25,456     | 28,049     | 23,255     | 21,665     | 23,669     | 23,957     | 23,405     | 22,533     | 24,306     | 26,016     | 28,077     | 25,604     | 295,994       | 83.65%     |
| _    | Supplemental Waste    | 453        | 480        | 349        | 397        | 609        | 432        | 416        | 372        | 578        | 635        | 577        | 602        | 5,900         | 1.67%      |
|      | MSW Totals            | 30,387     | 32,927     | 27,871     | 26,877     | 28,582     | 28,882     | 27,981     | 26,603     | 28,899     | 30,908     | 33,328     | 30,592     | 353,837       | 100.00%    |
|      |                       | <u>Jul</u> | <u>Aug</u> | <u>Sep</u> | <u>Oct</u> | <u>Nov</u> | <u>Dec</u> | <u>Jan</u> | <u>Feb</u> | <u>Mar</u> | <u>Apr</u> | <u>May</u> | <u>Jun</u> | <u>Totals</u> | % of Total |
|      | City Waste            | 1,932      | 1,693      | 1,831      |            |            |            |            |            |            |            |            |            | 5,456         | 6.4%       |
| 97   | County Waste          | 2,555      | 2,337      | 2,507      |            |            |            |            |            |            |            |            |            | 7,399         | 8.6%       |
| FY26 | Municipal Solid Waste | 23,598     | 22,526     | 25,240     |            |            |            |            |            |            |            |            |            | 71,364        | 83.3%      |
|      | Supplemental Waste    | 560        | 480        | 446        |            |            |            |            |            |            |            |            |            | 1,486         | 1.7%       |
|      | MSW Totals            | 28,645     | 27,037     | 30,023     |            |            |            |            |            |            |            |            |            | 85,705        | 100.0%     |



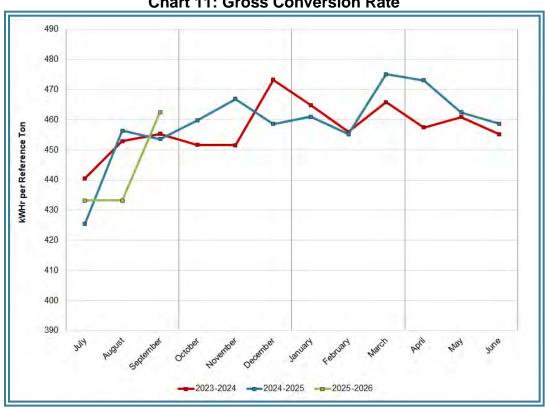
**Chart 9: Cumulative Total Waste Delivery** 

As depicted in Table 3 and Chart 9, Q1FY26 total waste delivery was 6.4% lower compared to Q1FY25.



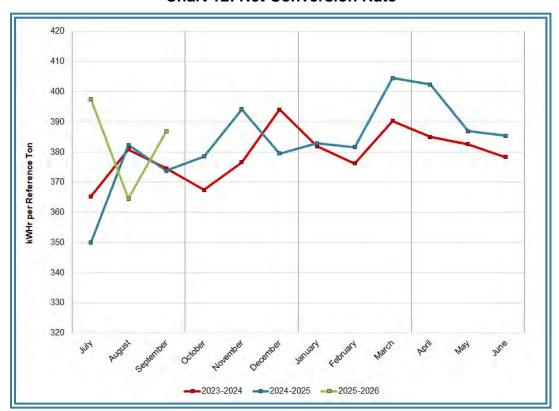
**Chart 10: Gross Electrical Generation** 

During Q1FY26, the Facility generated 41,529 MWh (gross) of electricity compared to the corresponding quarter in FY25 generation of 42,816 MWh (gross), a 3.1% decrease. The decrease in gross electrical production is attributable to the decrease in steam production (4.0%) paired with the required standby time for process limitations which reduced the boiler online time comparatively. The significant boiler offline time (90.4 hours of unscheduled downtime, 242.8 hours of scheduled downtime, and 145.5 hours of standby time) negatively impacts the following metrics covered in Charts 11-14.



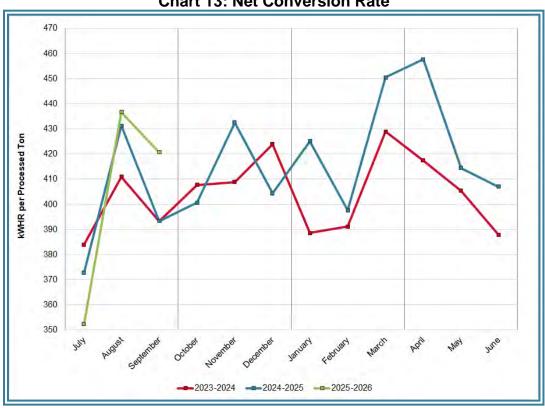
**Chart 11: Gross Conversion Rate** 

As shown in Chart 11, the average gross electrical generation per reference ton of refuse processed during Q1FY26 was 443 kWh per reference ton, which is 0.5% less than the corresponding quarter in FY25 due to the experienced downtime.



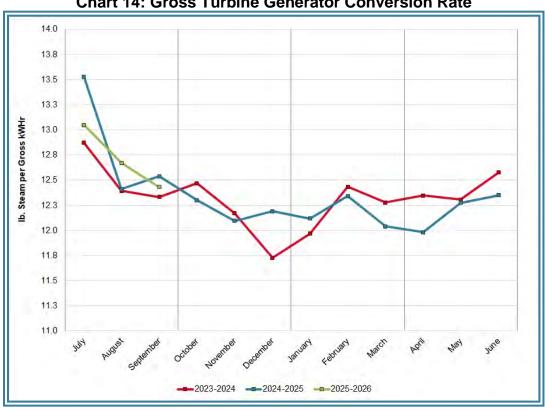
**Chart 12: Net Conversion Rate** 

Chart 12 depicts the normalized net power generation (gross minus in-house usage). In Q1FY26, the average net electrical generation per reference ton was 381 kWh per ton, which is 3.3% lower than the corresponding quarter in FY25 due to the experienced downtime.



**Chart 13: Net Conversion Rate** 

Chart 13 depicts the net power generation per processed ton. The net electrical generation per processed ton in Q1FY26 was 403 kWh per ton, which is 0.8% higher than corresponding quarter in FY25 due to less turbine generator downtime.



**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 Q1FY26 the average pounds of steam consumed per gross kWh generated was 12.7, which is slightly lower (0.9%), and more efficient, than the corresponding guarter in FY25. The average main steam temperature during the quarter was 681.2°F, which is 4.1°F lower than the average main steam temperature of the corresponding quarter last fiscal year and 18.8°F lower than design temperature of 700 °F.

#### 3.2 Utility and Reagent Consumptions

**Table 4: Facility Utility and Reagent Consumptions** 

| Utility               | Units | Q1FY26<br>Total | Q1FY25<br>Total | Q1FY26 "Per Processed Ton" Consumption | Q1FY245 "Per Processed Ton" Consumption |
|-----------------------|-------|-----------------|-----------------|--|---|
| Fuel Oil              | Gal.  | 19,770          | 12,310          | 0.4                                    | 0.1                                     |
| Boiler Make-up        | Gal.  | 2,044,000       | 1,635,000       | 23.0                                   | 18.4                                    |
| Cooling Tower Make-up | Gal.  | 48,447,933      | 52,917,765      | 545.6                                  | 595.7                                   |
| Pebble Lime           | Lbs.  | 1,418,000       | 1,402,000       | 16.0                                   | 15.8                                    |
| Ammonia               | Lbs.  | 184,000         | 171,000         | 4.1                                    | 3.8                                     |
| Carbon                | Lbs.  | 66,000          | 72,000          | 0.7                                    | 0.8                                     |

Fuel oil usage during the quarter represents approximately 0.32% of the total heat input to the boilers, which compares favorably with industry averages, and is more than the 0.20% of total heat input in Q1FY25. Fuel oil is used to stabilize combustion of wet fuel, as well as during start-up and shutdown of the boilers. Boiler makeup water usage during the quarter represents 3.2% of steam flow, which is higher than the boiler makeup in Q1FY25 (2.5% of steam flow). Higher boiler makeup quantities are indicative of increased steam leakage.

In comparing Q1FY26 to Q1FY25 on a per processed ton consumption basis:

- The total fuel oil consumption rate was 61% higher
- The boiler make-up water consumption rate was 25% higher
- The cooling tower make-up water consumption rate was 8.4% lower
- The total pebble lime consumption rate was 1.1% higher
- The ammonia consumption rate was 7.6% higher
- The carbon consumption rate was 8.3% lower

The increase in fuel oil consumption is primarily attributable to the increased number of start-ups and shutdowns in Q1FY26 (14 events) compared to Q1FY25 (7 events).

#### 3.3 Safety & Environmental Training

The Facility experienced one (1) OSHA recordable accidents and no First Aid Accidents during Q1FY26. The OSHA recordable incident occurred on September 30<sup>th</sup> when an employee fell in the drainage trenches on the lower level and bruised their leg. RAAI operated 369 days without an OSHA recordable accident prior to the September 30, 2025 accident. Safety trainings were conducted during the quarter with themes as follows:

#### **July 2025**

Emergency Action Plan

#### August 2025

Hearing Conservation

#### September 2025

Portable Fire Extinguishers

#### 4.0 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 the maintenance performed. Beginning on July 1, 2025, Boiler No. 2 experienced 64.4 hours of downtime for a scheduled cleaning outage. Some significant maintenance items completed during the cleaning outage are:

- Replaced the discharger drive cylinder
- Repaired under fire air fan termination
- Repaired auxiliary burner fuel control valve

Beginning on July 21, 2025, Boiler No. 1 experienced 76.0 hours of downtime for a scheduled cleaning outage. Some significant maintenance items completed during the cleaning outage are:

- Repaired holes in baghouse hopper
- Replaced ash discharger vibrator, discharger screw and gearbox
- Replaced baghouse north collection screw

Beginning on September 12, 2025, Boiler No. 3 experienced 102.4 hours of downtime for a scheduled minor outage. Some significant maintenance items completed during the cleaning outage are:

- Rebuilt second pass hopper due to blasting damage
- Replaced as needed grate bars and J bars
- Patched holes in feed chute hopper, skin casing, and ID fan outlet duct
   In addition to the scheduled cleaning outages, RAAI reports that 891 preventative
   maintenance actions were completed during the quarter.

#### 4.1 Availability

Facility availabilities for Q1FY26 are shown in Table 5. According to RAAI reports, the average availability for Boiler Nos. 1, 2, and 3 for Q1FY26 was 93.7%, 96.5%, and 93.6%, respectively. The three-boiler average availability during the quarter was 94.6%, which is excellent compared to industry standard averages and excludes 146.0 total hours of standby downtime experienced by the boilers in July 2025.

According to RAAI reports, the average availabilities for Turbine Generator 1 and 2 for Q1FY26 was 99.1% and 99.8%, respectively. Note that 48.0 hours of standby time was experienced by the Turbine Generators during the quarter and does not factor into overall availability.

**Table 5: Quarterly Facility Unit Availabilities** 

| Availability  | Q1FY26 Average |
|---------------|----------------|
| Boiler No. 1  | 93.7%          |
| Boiler No. 2  | 96.5%          |
| Boiler No. 3  | 93.6%          |
| Avg.          | 94.6%          |
| Turbine No. 1 | 99.1%          |
| Turbine No. 2 | 99.8%          |
| Avg.          | 99.5%          |

Table 6: Boiler Downtime - Q1FY26

| Boiler<br>Number  | Outage<br>Begin Date | Outage<br>End Date | Hours<br>Unavailable | Downtime<br>Classification | Reason Unavailable      |  |
|-------------------|----------------------|--------------------|----------------------|----------------------------|-------------------------|--|
| 2                 | 7/1/2025             | 7/3/2025           | 64.4                 | Scheduled                  | Scheduled Cleaning      |  |
| 3                 | 7/1/2025             | 7/1/2025           | 10.5                 | Unscheduled                | FD Fan Failure          |  |
| 2                 | 7/4/2025             | 7/4/2025           | 7.0                  | Unscheduled                | Ash Discharger Pluggage |  |
| 1                 | 7/21/2025            | 7/24/2025          | 76.0                 | Scheduled                  | Scheduled Cleaning      |  |
| 1                 | 7/25/2025            | 7/29/2025          | 104.0                | Standby                    | Permit Compliance       |  |
| 2                 | 7/29/2025            | 7/31/2025          | 41.5                 | Standby                    | Permit Compliance       |  |
| 1                 | 8/20/2025            | 8/20/2025          | 1.7                  | Unscheduled                | Switchgear Failure      |  |
| 2                 | 8/20/2025            | 8/20/2025          | 2.9                  | Unscheduled                | Switchgear Failure      |  |
| 3                 | 8/20/2025            | 8/20/2025          | 4.4                  | Unscheduled                | Switchgear Failure      |  |
| 1                 | 8/26/2025            | 8/28/2025          | 42.9                 | Unscheduled                | Economizer Tube Leak    |  |
| 1                 | 8/29/2025            | 8/29/2025          | 14.4                 | Unscheduled                | ID Fan Failure          |  |
| 3                 | 9/12/2025            | 9/18/2025          | 102.4                | Scheduled                  | Minor Outage            |  |
| 1                 | 9/25/2025            | 9/25/2025          | 3.3                  | Unscheduled                | Switchgear Failure      |  |
| 2                 | 9/25/2025            | 9/25/2025          | 3.3                  | Unscheduled                | Switchgear Failure      |  |
| <b>Total Uns</b>  | cheduled Dow         | ntime              |                      |                            | 90.4 Hours              |  |
| Total Sch         | eduled Downti        | me                 |                      | 242.8 Hours                |                         |  |
| <b>Total Star</b> | ndby Downtime        | е                  |                      | 145.5 Hours                |                         |  |
| <b>Total Dow</b>  | /ntime               |                    |                      |                            | 478.7 Hours             |  |

**Table 7: Turbine Generator Downtime - Q1FY26** 

| Turbine<br>Generator<br>Number | Outage<br>Begin<br>Date | Outage<br>End Date | Hours<br>Unavailable | Downtime<br>Classification | Reason Unavailable       |  |  |  |
|--------------------------------|-------------------------|--------------------|----------------------|----------------------------|--------------------------|--|--|--|
| 2                              | 7/23/2025               | 7/24/2025          | 48.0                 | Standby                    | Boiler Outage - No Steam |  |  |  |
| 1                              | 8/20/2025               | 8/20/2025          | 2.5 Unscheduled      |                            | Switchgear Failure       |  |  |  |
| 1                              | 8/27/2025               | 8/27/2025          | 17.0                 | Unscheduled                | Condenser Tube Failure   |  |  |  |
| 2                              | 8/20/2025               | 8/20/2025          | 3.9                  | Unscheduled                | Switchgear Failure       |  |  |  |
| <b>Total Unsched</b>           | duled Downtin           | ne                 | 23.4 Hours           |                            |                          |  |  |  |
| <b>Total Schedul</b>           | led Downtime            |                    | 0.0 Hours            |                            |                          |  |  |  |
| <b>Total Standby</b>           | Downtime                |                    | 48.0 Hours           |                            |                          |  |  |  |
| <b>Total Downtin</b>           | ne                      |                    | 71.4 Hours           |                            |                          |  |  |  |

#### 4.2 Facility Housekeeping

RAAI is performing Facility housekeeping and maintaining plant cleanliness in accordance with acceptable industry practices. A site walkdown was conducted in October 2025. Photos of interest from the walkdown are depicted in Appendix B. The Facility housekeeping ratings from the October 2025 walkdown are presented in Table 8.

Table 8: Facility Housekeeping Ratings – October 2025

| Table of Table                | ty Houseksepin |                      |              |
|-------------------------------|----------------|----------------------|--------------|
| Facility Area                 | Acceptable     | Needs<br>Improvement | Unacceptable |
| Tipping Floor                 | $\sqrt{}$      |                      |              |
| Citizen's Drop-off Area       | $\checkmark$   |                      |              |
| Tipping Floor Truck Exit      | $\sqrt{}$      |                      |              |
| Front Parking Lot             | $\sqrt{}$      |                      |              |
| Rear Parking Lot              | $\sqrt{}$      |                      |              |
| <b>Boiler House Pump Room</b> | $\sqrt{}$      |                      |              |
| Lime Slurry Pump Room         | $\sqrt{}$      |                      |              |
| Switchgear Area               | $\sqrt{}$      |                      |              |
| Ash Load-out Area             | $\sqrt{}$      |                      |              |
| Vibrating Conveyor Area       | $\sqrt{}$      |                      |              |
| Ash Discharger Area           | $\sqrt{}$      |                      |              |
| Cooling Tower Area            | $\sqrt{}$      |                      |              |
| Truck Scale Area              | $\sqrt{}$      |                      |              |
| SDA/FF Conveyor Area          | $\sqrt{}$      |                      |              |
| SDA Penthouses                | $\sqrt{}$      |                      |              |
| Lime Preparation Area         |                |                      |              |
| Boiler Drum Levels            | $\sqrt{}$      | _                    |              |
| Turbine Room                  |                |                      |              |
| Electrical Room               |                |                      |              |

#### 5.0 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 Q1FY26 are summarized in Appendix A. The Facility experienced no permit deviations during Q1FY26. As of September 30, 2025, the Facility has operated 134 days without an environmental excursion.

#### **5.1 Nitrogen Oxide Emissions**

During Q1FY26, the monthly emission concentrations of nitrogen oxides (NO<sub>x</sub>) averaged 86.9 ppm, 85.5 ppm, and 85.5 ppm for Boiler Nos. 1, 2, and 3, respectively. All stack NO<sub>x</sub> concentrations remain below the permit limit (110 ppm, 24-hr average, @ 7% O<sub>2</sub>) implemented after the installation of the LN system. The ammonia consumption rate during the quarter was 2.1 lbs/ton, which is on the higher end compared to historical consumption which have ranged in 1.9 lbs/ton to 2.1 lbs/ton since the implementation of the LN system on all boilers was complete in 2022.

#### 5.2 Sulfur Dioxide Emissions

During Q1FY26 the monthly emission concentration of stack sulfur dioxide ( $SO_2$ ) averaged 2.0 ppm, 0.3 ppm, and 0.3 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%  $O_2$ .

#### 5.3 Carbon Monoxide Emissions

During Q1FY26, the monthly average CO emission concentrations on Boiler Nos. 1, 2, and 3 were 25.3 ppm, 27.3 ppm, and 20.0 ppm, respectively, and all are well within permit limits (100 ppmdv, 4-hour average).

#### 5.4 Opacity

During Q1FY26, the average opacities on Boiler Nos. 1, 2, and 3 were 0.8%, 1.0%, and 2.1%, respectively, which are all significantly below the 10% (6-minute) average permit limit.

#### 5.5 Daily Emissions Data

Appendix A, Tables 10, 11, and 12 tabulate the monthly average, maximum, and minimum emissions data for each unit during Q1FY26. 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.

#### 5.6 Ash System Compliance

Results from the TCLP testing conducted in March 2025 and September 2025 are depicted in Table 10 and Chart 16 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 Q1FY26, the average ash pH for in-house tests was 9.2, which falls within the target range of 8 to 11.

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

| Metals   | 90% Upper<br>Confidence<br>(March 2025) | 90% Upper<br>Confidence<br>(Sept 2025) | Regulatory<br>Threshold<br>(mg/L) | % of<br>Threshold<br>(March 2025) | % of<br>Threshold<br>(Sept 2025) |  |
|----------|---|--|-----------------------------------|-----------------------------------|----------------------------------|--|
| Arsenic  | 0.050                                   | 0.050                                  | 5.0                               | 1.0%                              | 1.0%                             |  |
| Barium   | 0.844                                   | 0.766                                  | 100.0                             | 0.8%                              | 0.8%                             |  |
| Cadmium  | 0.130                                   | 0.210                                  | 1.0                               | 13.0%                             | 21.0%                            |  |
| Chromium | 0.050                                   | 0.100                                  | 5.0                               | 1.0%                              | 2.0%                             |  |
| Lead     | 0.080                                   | 0.180                                  | 5.0                               | 1.6%                              | 3.6%                             |  |
| Mercury  | 0.0004                                  | 0.0004                                 | 0.2                               | 0.2%                              | 0.2%                             |  |
| Selenium | 0.050                                   | 0.006                                  | 1.0                               | 5.0%                              | 0.6%                             |  |
| Silver   | 0.050                                   | 0.050                                  | 5.0                               | 1.0%                              | 1.0%                             |  |

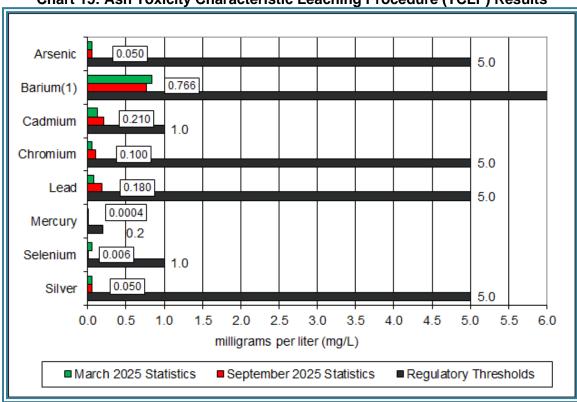
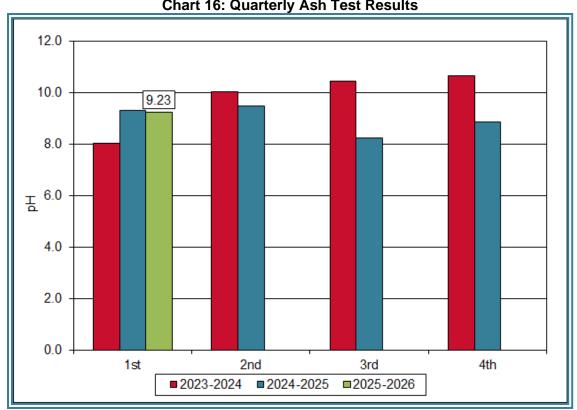


Chart 15: Ash Toxicity Characteristic Leaching Procedure (TCLP) Results

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



## 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<br>Steam | U-1 Econ           | U-1<br>Stack       | U-1<br>Stack | U-1<br>Stack       | U-1<br>Opaci | U-1 FF In    | U-1<br>Carbo | U-1 Lime     |
| Short Descrip.    |       | SteamFl      | SO <sub>2</sub> ec | SO <sub>2</sub> sc | COsc         | NO <sub>x</sub> sc | Opacity      | FF<br>InTemp | Carblnj      | LimeFlo<br>w |
| Units             |       | K#/Hr        | ppmc               | ppm                | ppmc         | ppmc               | %            | deg F        | #/hr         | gpm          |
| Rang              | Range |              | 0-2000             | 0-500              | 0-4000       | 0-1000             | 0-100        | 100-500      | 0-50         | 0-20         |
|                   | AVG   | 79.5         | 21.0               | 2.0                | 24.0         | 88.0               | 0.5          | 297.0        | 10.4         | 3.3          |
| Jul – 25          | Max   | 92.0         | 77.0               | 3.0                | 44.0         | 91.0               | 0.9          | 298.0        | 12.0         | 4.1          |
|                   | Min   | 65.8         | 7.0                | 0.0                | 13.0         | 85.0               | 0.0          | 286.0        | 10.2         | 2.8          |
| Aug – 25          | AVG   | 91.6         | 51.0               | 2.0                | 27.0         | 90.0               | 1.9          | 298.0        | 10.3         | 3.9          |
|                   | Max   | 92.8         | 73.0               | 6.0                | 38.0         | 96.0               | 2.5          | 300.0        | 10.8         | 4.6          |
|                   | Min   | 88.7         | 36.0               | 1.0                | 11.0         | 87.0               | 0.8          | 296.0        | 10.2         | 3.6          |
| Sept - 25         | AVG   | 89.7         | 26.0               | 2.0                | 25.0         | 87.0               | 0.1          | 298.0        | 10.3         | 3.8          |
|                   | Max   | 93.4         | 44.0               | 3.0                | 39.0         | 91.0               | 2.3          | 298.0        | 10.5         | 4.2          |
|                   | Min   | 78.8         | 14.0               | 0.0                | 15.0         | 81.0               | 0.0          | 296.0        | 10.3         | 3.5          |
| Quarter Average   |       | 86.9         | 32.7               | 2.0                | 25.3         | 88.3               | 0.8          | 297.7        | 10.3         | 3.7          |
| Quarter Max Value |       | 93.4         | 77.0               | 6.0                | 44.0         | 96.0               | 2.5          | 300.0        | 12.0         | 4.6          |
| Quarter Min Value |       | 65.8         | 7.0                | 0.0                | 11.0         | 81.0               | 0.0          | 286.0        | 10.2         | 2.8          |
| Limits:           |       | 98           | NA                 | 29                 | 100          | 110                | 10           | 331          | 12(a)        |              |

<sup>(</sup>a) Carbon flow limit is a minimum value

<sup>(</sup>b) Limit for NOx is based on an average daily limit

<sup>\*</sup> 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<br>Steam | U-2 Econ           | U-2<br>Stack       | U-2<br>Stack | U-2<br>Stack       | U-2<br>Opaci | U-2 FF In    | U-2<br>Carbo | U-2 Lime     |
| Short Descrip.    |     | SteamFl      | SO <sub>2</sub> ec | SO <sub>2</sub> sc | COsc         | NO <sub>x</sub> sc | Opacity      | FF<br>InTemp | Carblnj      | LimeFlo<br>w |
| 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         |
|                   | AVG | 78.4         | 49.0               | 1.0                | 25.0         | 88.0               | 1.1          | 295.0        | 10.4         | 3.3          |
| Jul – 25          | Max | 85.8         | 75.0               | 6.0                | 53.0         | 97.0               | 1.3          | 311.0        | 11.3         | 3.9          |
|                   | Min | 66.7         | 27.0               | 0.0                | 17.0         | 80.0               | 0.0          | 279.0        | 10.3         | 2.8          |
| Aug – 25          | AVG | 89.8         | 42.0               | 0.0                | 27.0         | 89.0               | 1.4          | 296.0        | 10.3         | 4.0          |
|                   | Max | 91.7         | 62.0               | 3.0                | 38.0         | 90.0               | 1.6          | 297.0        | 10.9         | 4.6          |
|                   | Min | 83.1         | 31.0               | 0.0                | 14.0         | 86.0               | 1.1          | 289.0        | 10.2         | 3.7          |
| Sept - 25         | AVG | 88.4         | 36.0               | 0.0                | 30.0         | 89.0               | 0.6          | 298.0        | 10.2         | 3.9          |
|                   | Max | 92.1         | 50.0               | 2.0                | 41.0         | 91.0               | 1.5          | 299.0        | 10.7         | 4.2          |
|                   | Min | 78.0         | 26.0               | 0.0                | 15.0         | 88.0               | 0.2          | 296.0        | 10.1         | 3.7          |
| Quarter Average   |     | 85.5         | 42.3               | 0.3                | 27.3         | 88.7               | 1.0          | 296.3        | 10.3         | 3.7          |
| Quarter Max Value |     | 92.1         | 75.0               | 6.0                | 53.0         | 97.0               | 1.6          | 311.0        | 11.3         | 4.6          |
| Quarter Min Value |     | 66.7         | 26.0               | 0.0                | 14.0         | 80.0               | 0.0          | 279.0        | 10.1         | 2.8          |
| Limits:           |     | 98           | NA                 | 29                 | 100          | 110                | 10           | 331          | 12(a)        |              |

<sup>(</sup>a) Carbon flow limit is a minimum value

<sup>(</sup>b) Limit for NOx is based on an average daily limit

<sup>\*</sup> 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#-C        | hannel#  | G8-C35       | G8-C28             | G8-C8              | G8-C4        | G8-C12             | G8-C34       | G8-C37       | G8-C40       | G8-C39       |
|-----------------|----------|--------------|--------------------|--------------------|--------------|--------------------|--------------|--------------|--------------|--------------|
| Long Descrip.   |          | U-3<br>Steam | U-3 Econ           | U-3<br>Stack       | U-3<br>Stack | U-3<br>Stack       | U-3<br>Opaci | U-3 FF In    | U-3<br>Carbo | U-3 Lime     |
| Short Descrip.  |          | SteamFl      | SO <sub>2</sub> ec | SO <sub>2</sub> sc | COsc         | NO <sub>x</sub> sc | Opacity      | FF<br>InTemp | Carblnj      | LimeFlo<br>w |
| Units           |          | K#/Hr        | ppmc               | ppm                | ppmc         | ppmc               | %            | deg F        | #/hr         | gpm          |
| Ran             | ge       | 0-100        | 0-2000             | 0-500              | 0-4000       | 0-1000             | 0-100        | 100-500      | 0-50         | 0-20         |
|                 | AVG      | 79.1         | 34.0               | 1.0                | 19.0         | 87.0               | 2.1          | 299.0        | 10.3         | 3.5          |
| Jul – 25        | Max      | 89.8         | 68.0               | 7.0                | 34.0         | 89.0               | 2.5          | 299.0        | 11.0         | 4.2          |
|                 | Min      | 66.1         | 20.0               | 0.0                | 6.0          | 85.0               | 1.7          | 296.0        | 10.2         | 2.9          |
|                 | AVG      | 90.2         | 31.0               | 0.0                | 22.0         | 87.0               | 2.4          | 299.0        | 10.2         | 4.0          |
| Aug – 25        | Max      | 91.9         | 46.0               | 1.0                | 30.0         | 89.0               | 2.6          | 299.0        | 10.4         | 4.7          |
|                 | Min      | 84.3         | 18.0               | 0.0                | 11.0         | 83.0               | 1.9          | 296.0        | 10.2         | 3.7          |
| Sept - 25       | AVG      | 87.3         | 43.0               | 0.0                | 19.0         | 88.0               | 1.9          | 299.0        | 10.4         | 4.1          |
|                 | Max      | 92.5         | 74.0               | 2.0                | 33.0         | 90.0               | 2.5          | 299.0        | 11.5         | 4.5          |
|                 | Min      | 77.9         | 19.0               | 0.0                | 9.0          | 84.0               | 0.9          | 299.0        | 10.3         | 3.8          |
| Quarter Average |          | 85.5         | 36.0               | 0.3                | 20.0         | 87.3               | 2.1          | 299.0        | 10.3         | 3.9          |
| Quarter Ma      | ax Value | 92.5         | 74.0               | 7.0                | 34.0         | 90.0               | 2.6          | 299.0        | 11.5         | 4.7          |
| Quarter Mi      | n Value  | 66.1         | 18.0               | 0.0                | 6.0          | 83.0               | 0.9          | 296.0        | 10.2         | 2.9          |
| Limits:         |          | 98           | NA                 | 29                 | 100          | 110                | 10           | 331          | 12(a)        |              |

<sup>(</sup>a) Carbon flow limit is a minimum value

<sup>(</sup>b) Limit for NOx is based on an average daily limit

<sup>\*</sup> 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 - October 2025** 



Figure 1: Cooling tower siding, grounding wire, nozzle flow



Figure 2: Circulating Water Pump housing is corroded



Figure 3: Siding and window repairs on East side of building



Figure 4: Spare transformer on site



Figure 5: Residential waste bin



Figure 6: Ash canopy appears in good condition



Figure 7: Temporary pump in service for trench drainage to Cooling Tower basin



Figure 8: New Circulation Water pump installed



Figure 9: Filtration tanks for Reverse Osmosis System



Figure 10: Blow down tank



Figure 11: Firing aisle - no issues observed



Figure 12: Boiler No. 1 new Run 2 grate drive cylinder



Figure 13: Boiler No. 2 Economizer Rotary Sootblowers



Figure 15: Refractory damaged around Rotary Sootblower G9B-11 on Boiler No. 1



Figure 17: Steam leak repaired on west side of Boiler No. 2 – Resolved Deficiency



Figure 14: Boiler No. 2 lagging detached and obstructing walkway



Figure 16: Minor leak on Boiler No. 1 external piping has been repaired – Resolved Deficiency



Figure 18: Insulation added around steam isolation valve on Boiler No. 3. – Resolved Deficiency



Figure 19: Seal air disconnected on Boiler No. 3 Rotary Sootblower G9-B09



Figure 21: Insulation and lagging damaged around Boiler No. 3 Steam Drum



Figure 23: Ferrous drum magnet with ongoing maintenance at the time of HDR site visit



Figure 20: Penthouse lights are in service over Boiler No. 1 – Resolved Deficiency



Figure 22: External Tube Leak on Boiler No. 2 right wall repaired



Figure 24: Cooling Water Tower decking clear of equipment and maintenance items



Figure 25: Unit 2 SDA Penthouse Enclosure



Figure 27: Debris and flyash covering decking inside Baghouse No. 1 Compartment Aisle



Figure 29: Unit 2 fly ash double dump valves operating properly



Figure 26: Unit 1 lower lime silo floor with significant corrosion – New Deficiency



Figure 28: Unit 1 baghouse hopper heaters on and in the manual position



Figure 30: Settling basin - no issues observed