ATTACHMENT 3

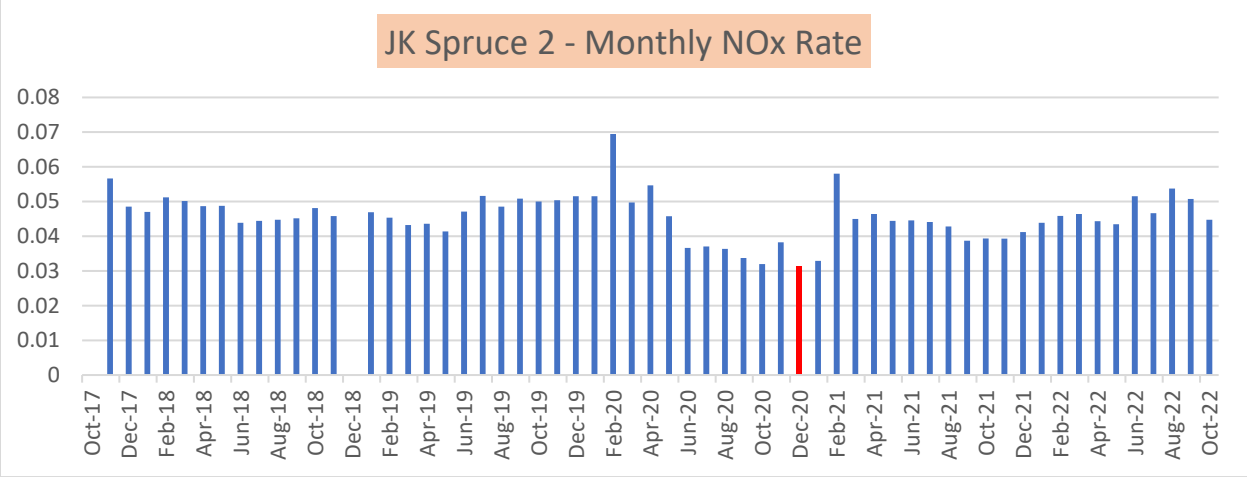
SIERRA CLUB

NOx Emission Rates at Selected Coal Fired Electricity Generating Units with SCR

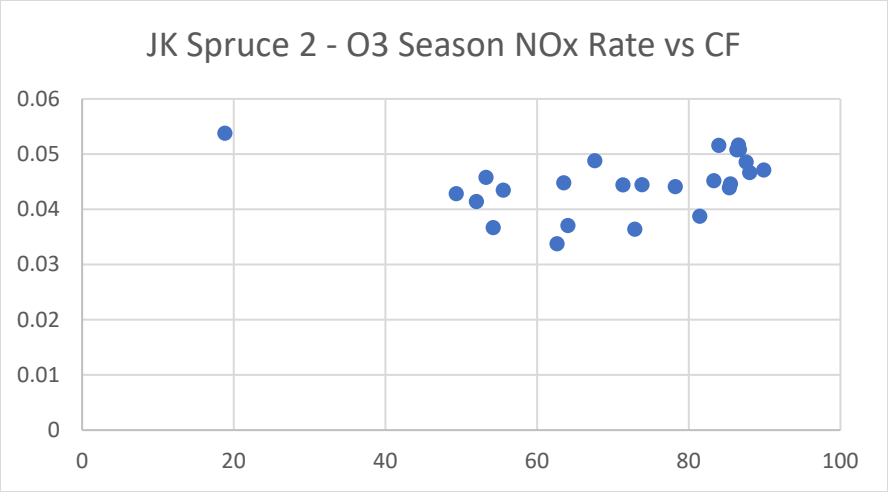
Texas

JK Spruce Unit 2: Unit 2 (878 MW) at the JK Spruce plant was analyzed. This unit has SCR installed. It can reliably achieve NOx emission rates of below 0.04 lb/MMBtu. This unit is not operating its SCR consistently in accordance with its lowest demonstrated NOx reduction capacity, and it is not because of low capacity factor nor MOT issues as the charts below make clear.

Plant	Unit	MW	NOx, Min	NOx, Max	NOx, Max 03 Months
JK Spruce	2	878	0.0313	0.0695	0.0537

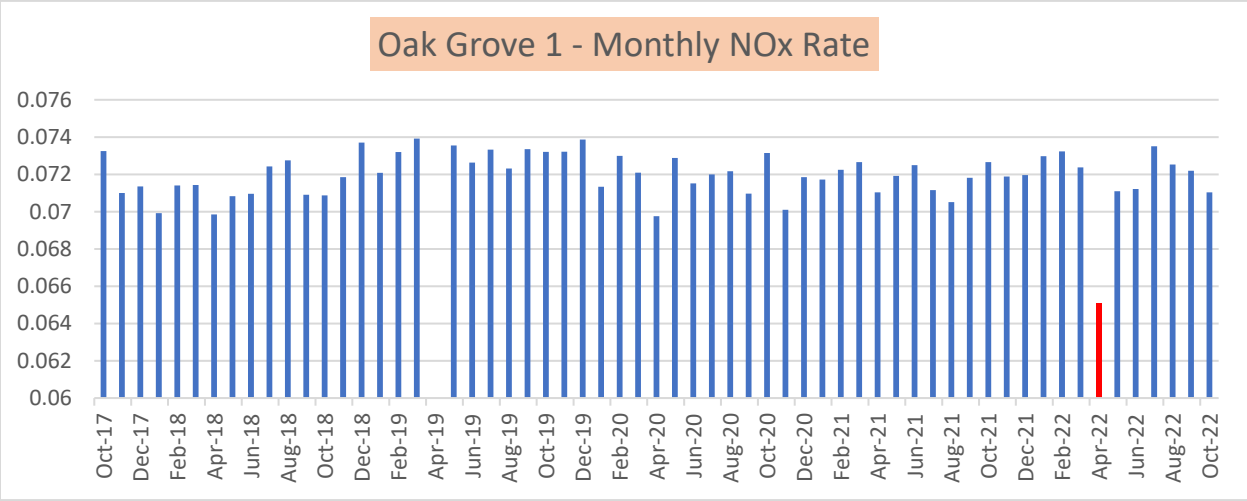


The chart above confirms that JK Spruce Unit 2 has achieved levels below 0.04 lb/MMBtu, with a low of 0.0313 lb/MMBtu, shown in red. The chart below shows that JK Spruce Unit 2 has achieved less than 0.04 lb/MMBtu over a range of ozone-season operating capacity factors.

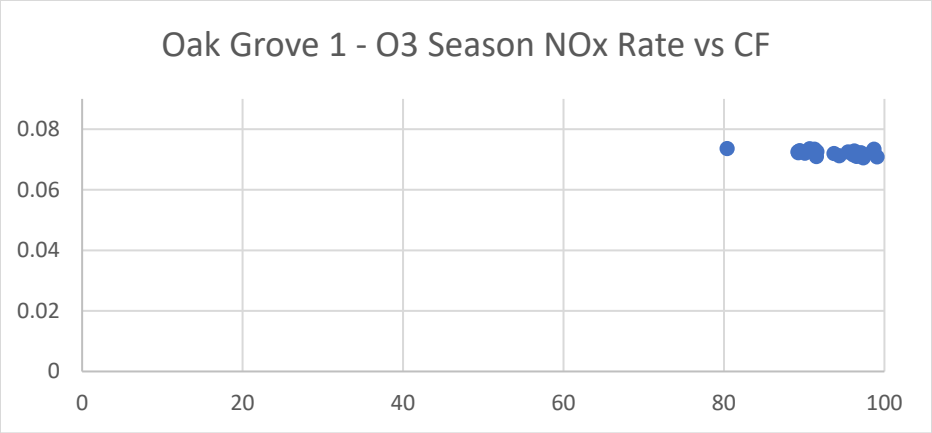


Oak Grove 1: Unit 1 (917 MW) at the Oak Grove plant was analyzed. This unit has SCR installed. It can achieve slightly lower NOx emission rates. It is not operating its SCR consistently according to the SCR's NOx reduction capacity, and it is not because of low capacity factor nor MOT issues as the charts below make clear.

Plant	Unit	MW	NOx, Min	NOx, Max	NOx, Max 03 Months
Oak Grove	1	917	0.0651	0.0739	0.0736
Oak Grove	2	879	0.0690	0.1117	0.0753

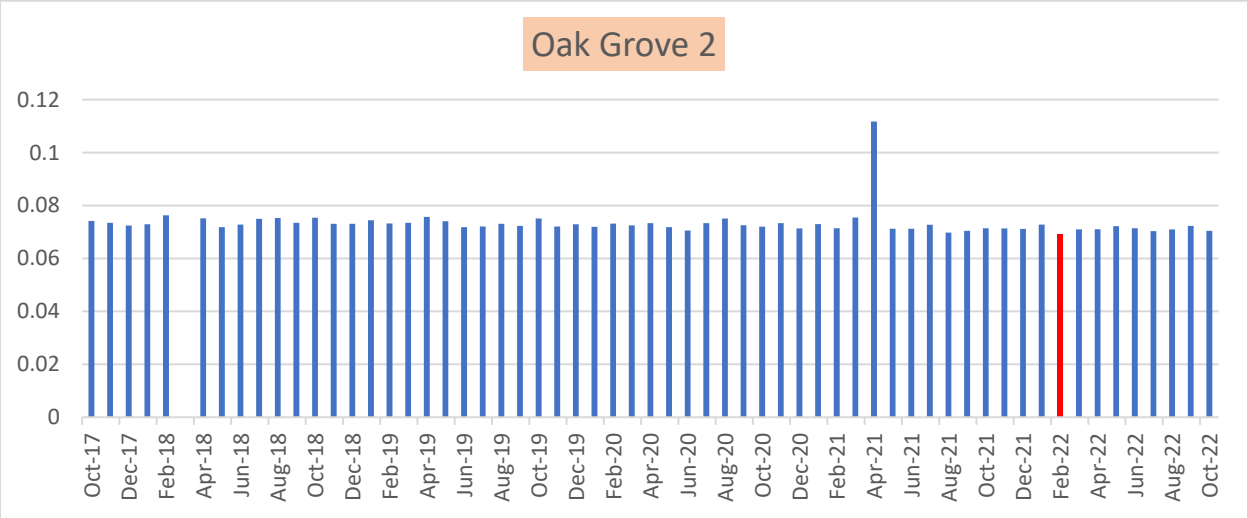


The chart above confirms that Oak Grove Unit 1 has achieved levels below 0.07 lb/MMBtu on several months of recent operation, with a low of 0.0651 lb/MMBtu, shown in red. The chart below shows that Oak Grove Unit 1 has achieved approximately 0.07 lb/MMBtu over a range of ozone-season operating capacity factors.

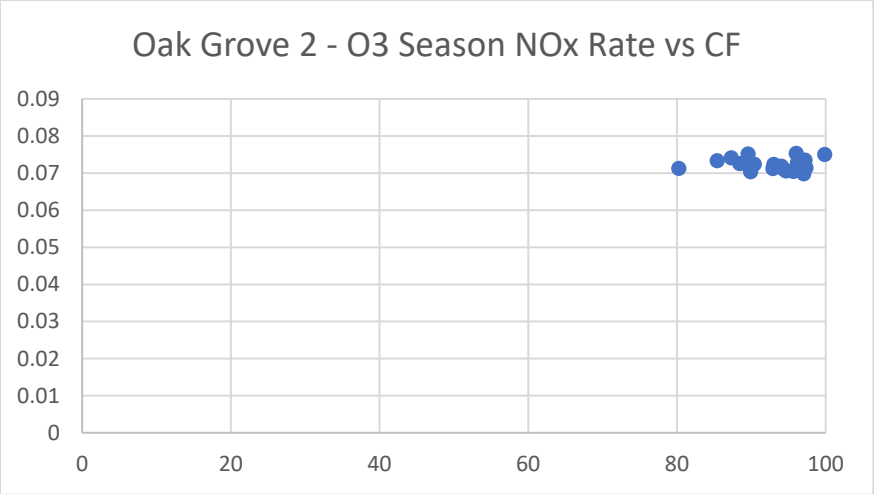


Oak Grove 2: Unit 2 (879 MW) at the Oak Grove plant was analyzed. This unit has SCR installed. It may be able to achieve slightly lower NOx emission rates.

Plant	Unit	MW	NOx, Min	NOx, Max	NOx, Max 03 Months
Oak Grove	1	917	0.0651	0.0739	0.0736
Oak Grove	2	879	0.0690	0.1117	0.0753

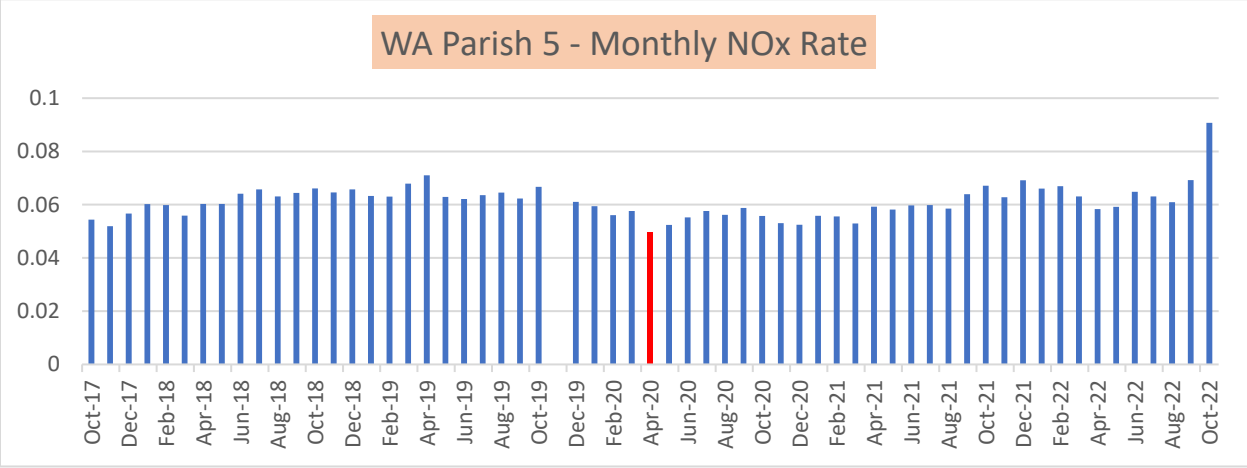


The chart above confirms that Oak Grove Unit 2 regularly achieves NOx emissions rates of approximately 0.07 lb/MMBtu, with a low of 0.0690 lb/MMBtu, shown in red.

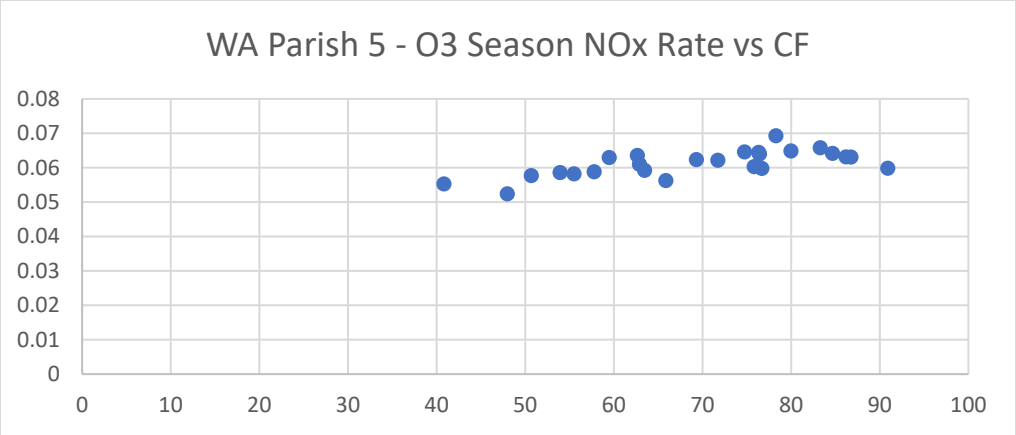


WA Parish Unit 5: Unit 5 (734 MW) at the WA Parish plant was analyzed. This unit has SCR installed. It can reliably achieve NOx emission rates below 0.06 lb/MMBtu. It is not operating its SCR consistently in accordance with the lowest demonstrated NOx reduction capacity, and it is not because of low capacity factor nor MOT issues as the charts below make clear.

Plant	Unit	MW	NOx, Min	NOx, Max	NOx, Max 03 Months
Parish	5	734	0.0499	0.0908	0.0692

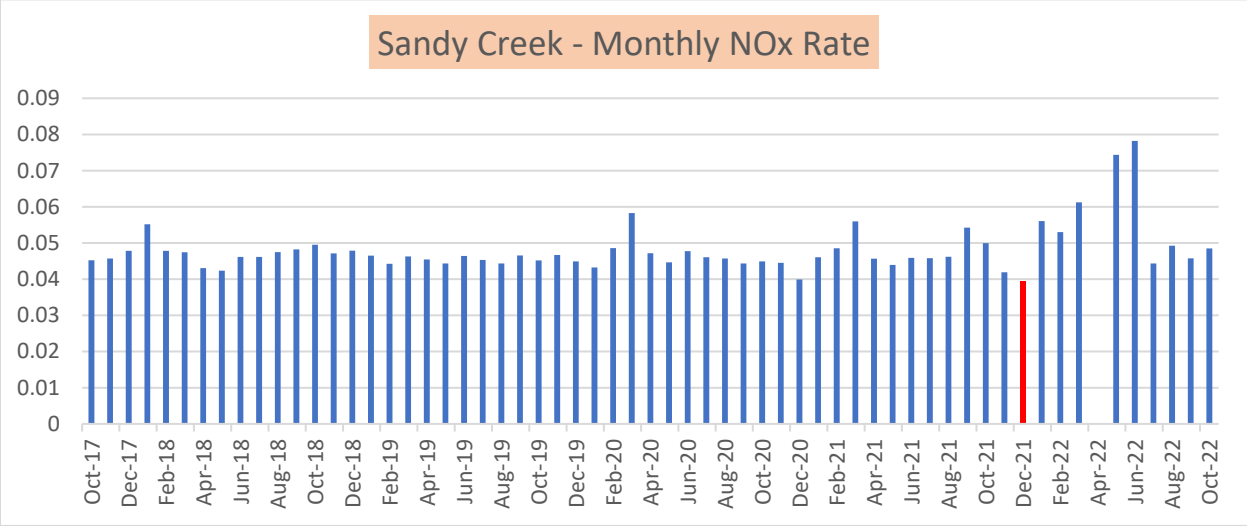


The chart above confirms that WA Parish Unit 5 has achieved levels below 0.06 lb/MMBtu on many months of recent operation, with a low of 0.0499 lb/MMBtu, shown in red. The chart below shows that WA Parish Unit 5 has achieved less than 0.06 lb/MMBtu over a wide range of ozone-season operating capacity factors.

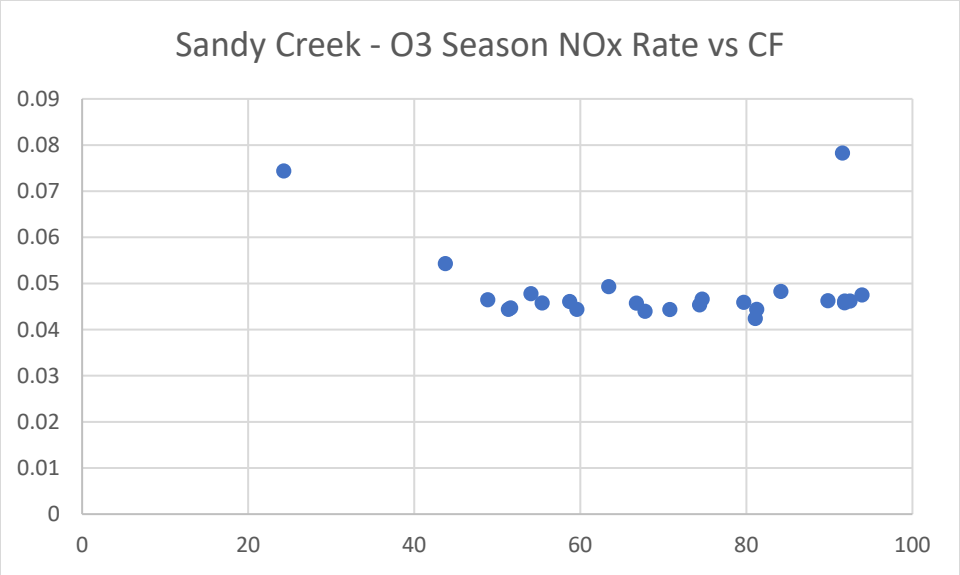


Sandy Creek Unit 1: Sandy Creek Unit 1 (1008 MW) was analyzed. This unit has SCR installed. It can reliably achieve NOx emission rates below 0.05 lb/MMBtu. It is not operating its SCR consistently in accordance with its lowest demonstrated NOx reduction capacity, and it is not because of low capacity factor nor MOT issues as the charts below make clear.

Plant	Unit	MW	NOx, Min	NOx, Max	NOx, Max 03 Months
Sandy Creek	1	1008	0.0395	0.0782	0.0782



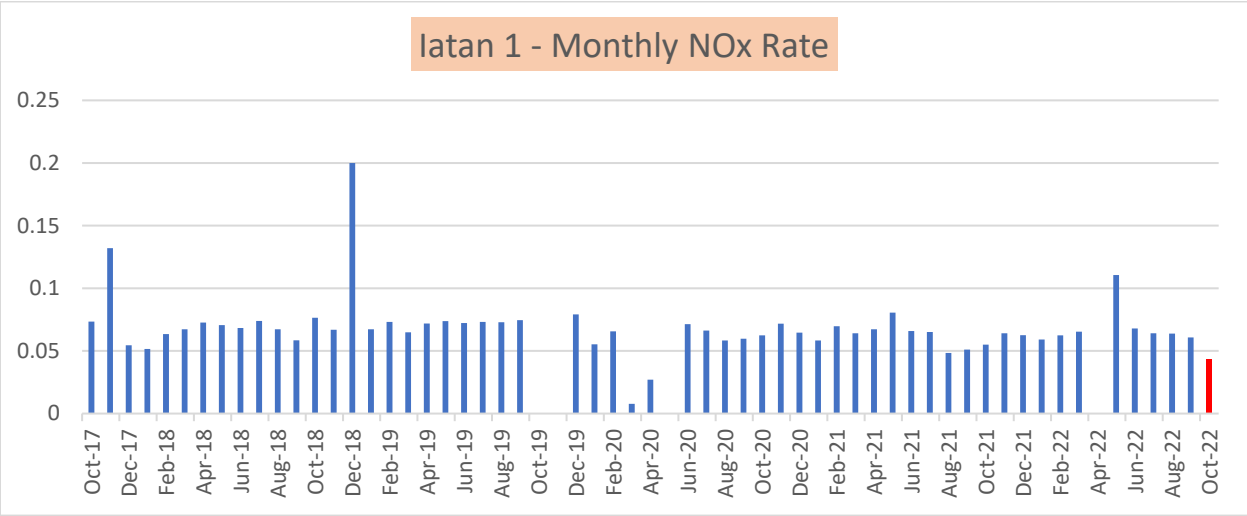
The chart above confirms that Sandy Creek 1 has achieved levels well below 0.05 lb/MMBtu on many months of recent operation, with a low of 0.0395 lb/MMBtu, shown in red. The chart below shows that Sandy Creek 1 has achieved less than 0.05 lb/MMBtu over a wide range of ozone-season operating capacity factors.



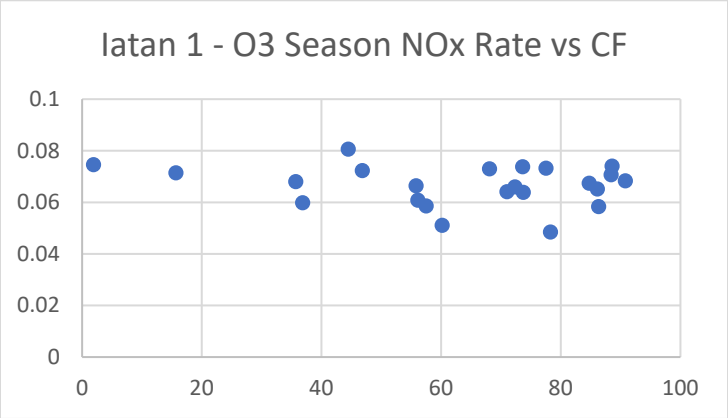
Missouri

Iatan 1: Unit 1 (726 MW) at the Iatan plant was analyzed. This unit has SCR installed. It can achieve reliably lower NOx emission rates below 0.06 lb/MMBtu. It is not operating its SCR consistently in accordance with the SCR's demonstrated NOx reduction capacity. It is not because of low capacity factor nor MOT issues as the charts below make clear.

Plant	Unit	MW	NOx, Min	NOx, Max	NOx, Max 03 Months
Iatan	1	726	0.0435	0.2000	0.0805
Iatan	2	914	0.0454	0.0595	0.0595

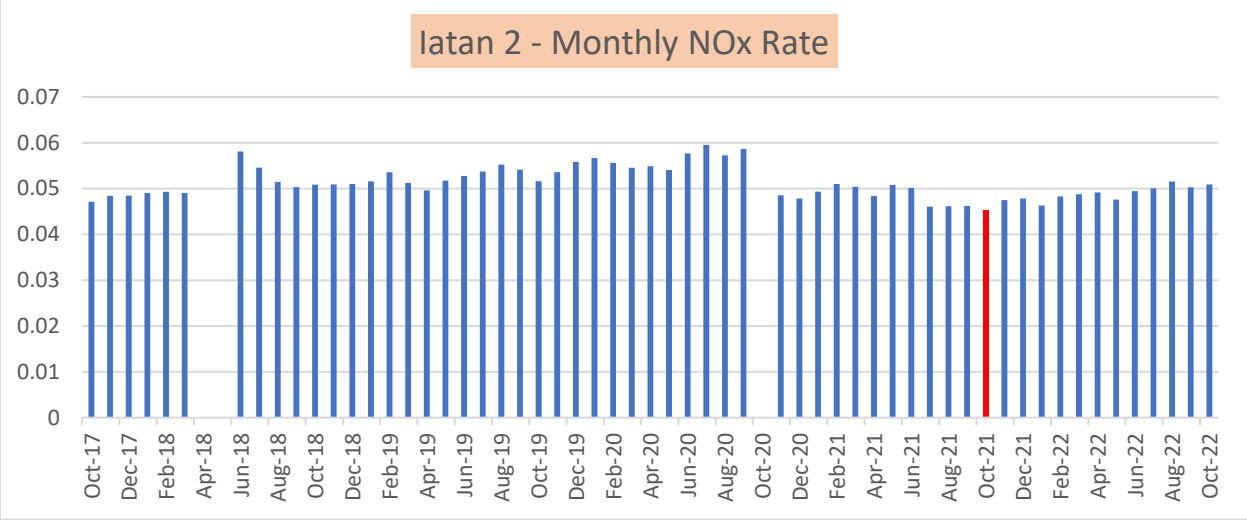


The chart above confirms that Iatan Unit 1 has achieved levels below 0.06 lb/MMBtu on several months of recent operation, with a low of .0435 lb/MMBtu, shown in red. The chart below shows that Iatan Unit 1 has achieved less than 0.06 lb/MMBtu over a wide range of ozone-season operating capacity factors.

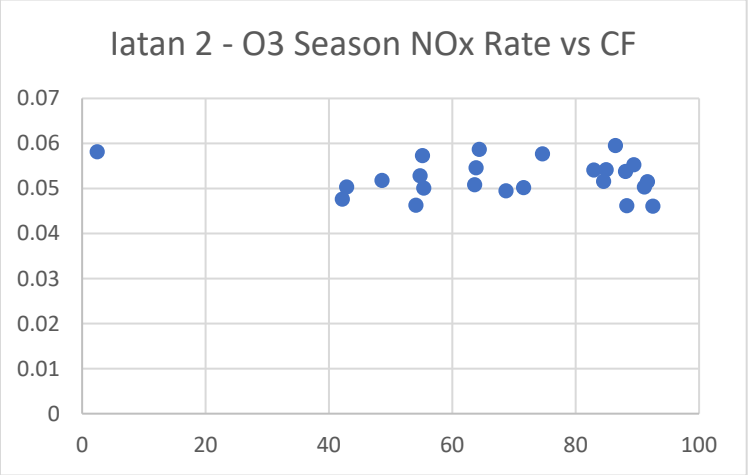


Iatan 2: Unit 2 (914 MW) at the Iatan plant was analyzed. This unit has SCR installed. It can reliably achieve NOx emission rates below 0.05 lb/MMBtu and has consistently done so from November 2020 through July 2022 excepting two months. It is not operating its SCR consistently in accordance with the SCR's lowest demonstrated NOx reduction capacity, and it is not because of low capacity factor nor MOT issues as the charts below make clear.

Plant	Unit	MW	NOx, Min	NOx, Max	NOx, Max 03 Months
Iatan	1	726	0.0435	0.2000	0.0805
Iatan	2	914	0.0454	0.0595	0.0595

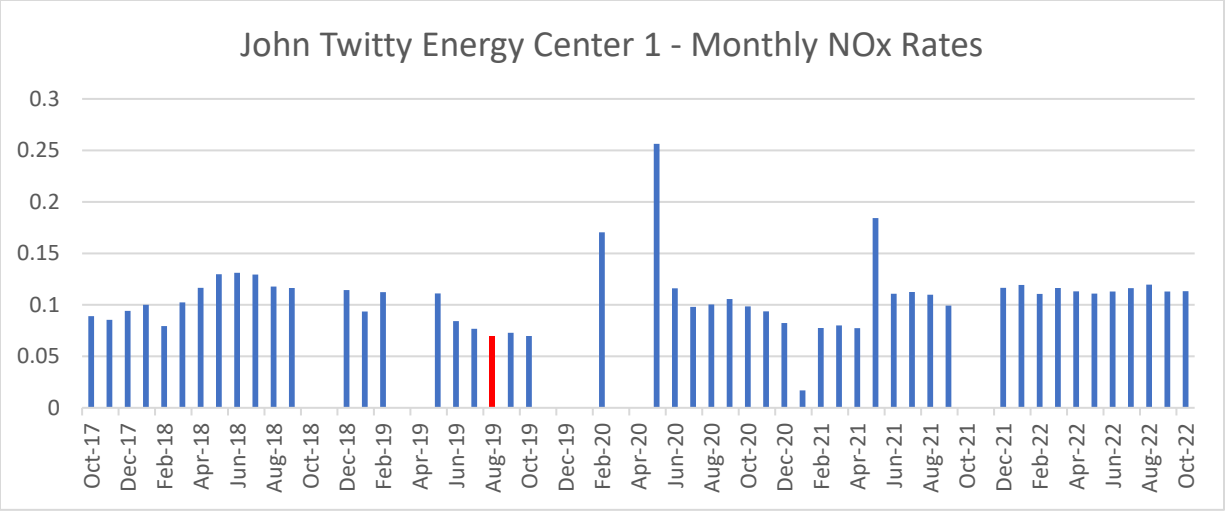


The chart above confirms that Iatan Unit 2 has achieved levels below 0.05 lb/MMBtu on many months of recent operation, with a low of 0.0454 lb/MMBtu, shown in red. The chart below shows that Iatan Unit 2 has achieved less than 0.05 lb/MMBtu over a wide range of ozone-season operating capacity factors.

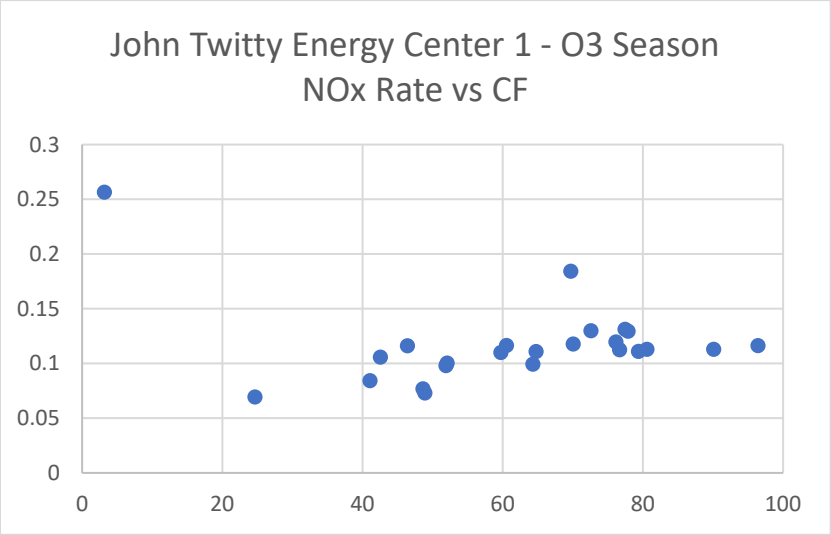


JTEC 1: Unit 1 (194 MW) at the John Twitty Energy Center plant was analyzed. This unit has SCR installed. It can reliably achieve NOx emission rates below 0.08 lb/MMBtu as demonstrated by its operation in 2019. It has wildly variable monthly NOx emission rates, ranging from above 0.25 lb/MMBtu at a high to 0.069 lb/MMBtu at a low. It is not operating its SCR consistently in accordance with its lowest demonstrated NOx reduction capacity. Indeed, it reliably emitted above 0.1 lb/MMBtu in late 2021 and 2022, significantly above its lowest demonstrated NOx reduction capacity achieved in 2019 of below 0.08 lb/MMBtu.

Plant	Unit	MW	NOx, Min	NOx, Max	NOx, Max 03 Months
John Twitty Energy Center	1	194	0.0693	0.2564	
John Twitty Energy Center	2	300	0.0637	0.0899	

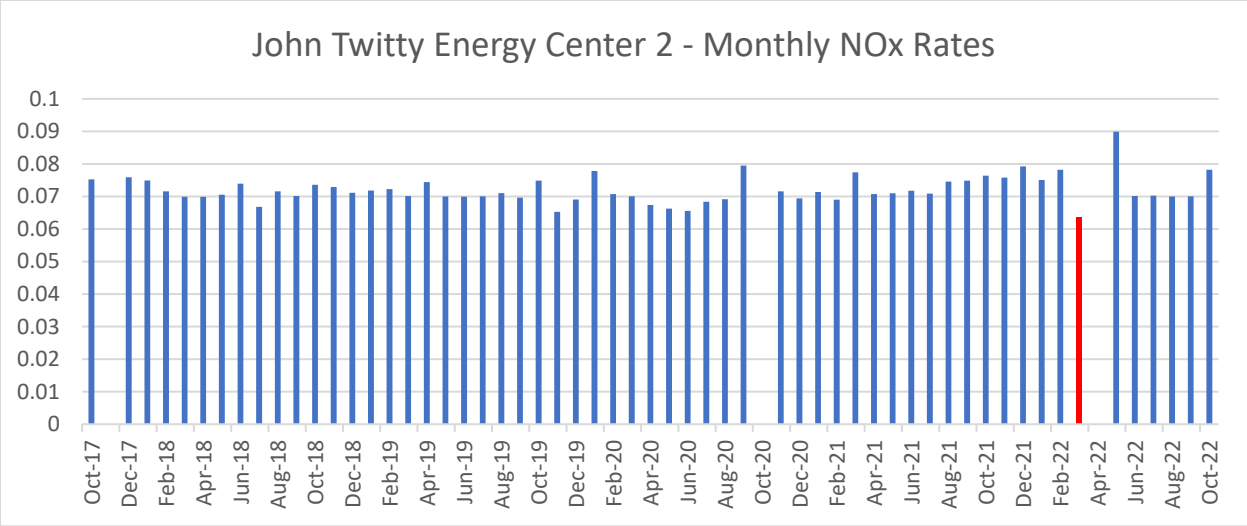


The chart above confirms that John Twitty Energy Center Unit 1 has consistently achieved levels below 0.08 lb/MMBtu on several months of recent operation, with a low of .0693 lb/MMBtu, shown in red. The chart below shows that John Twitty Energy Center Unit 1 has achieved less than 0.08 lb/MMBtu over a range of ozone-season operating capacity factors.

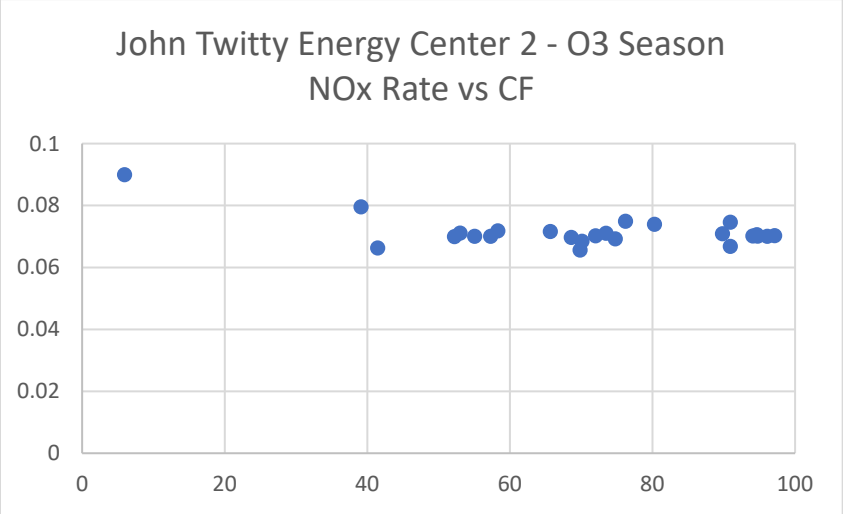


JTEC 2: Unit 2 (300 MW) at the John Twitty Energy Center plant was analyzed. This unit has SCR installed. It can reliably achieve NOx emissions rates at or below 0.07 lb/MMBtu. It is not operating consistent with its lowest demonstrated NOx reduction capacity.

Plant	Unit	MW	NOx, Min	NOx, Max	NOx, Max 03 Months
John Twitty Energy Center	1	194	0.0693	0.2564	
John Twitty Energy Center	2	300	0.0637	0.0899	

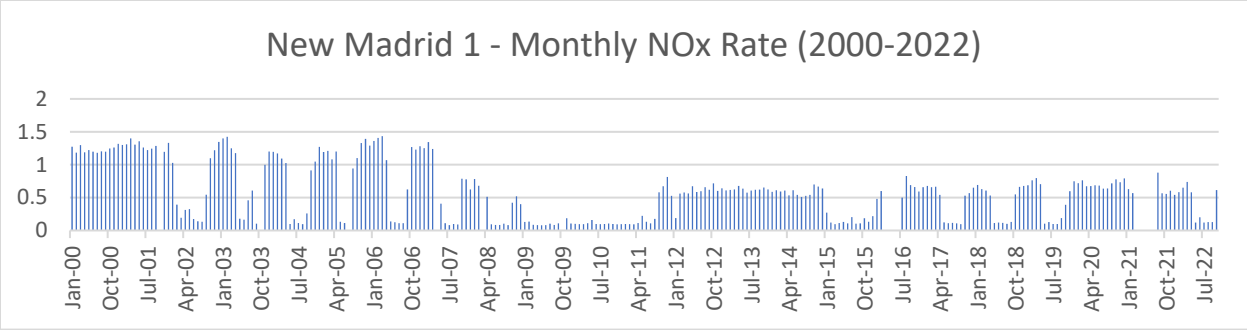


The chart above confirms that John Twitty Energy Center Unit 2 has achieved levels below 0.07 lb/MMBtu on several months of recent operation, with a low of .0637 lb/MMBtu, shown in red. The chart below shows that John Twitty Energy Center Unit 2 has achieved less than 0.07 lb/MMBtu over a range of ozone-season operating capacity factors.

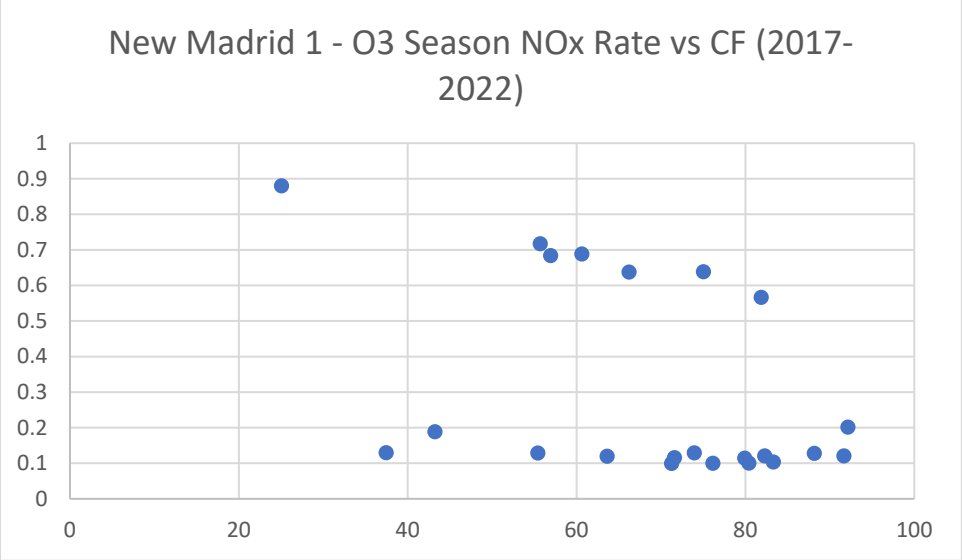


New Madrid 1: Unit 1 (600 MW) at the New Madrid plant was analyzed. This unit has SCR installed. Its NOx emissions rates are wildly variable. The unit can reliably achieve NOx emission rates below 0.10 lb/MMBtu. It is clearly not operating its SCR according to the SCR's NOx reduction capacity. During some ozone seasons, it is emitting at 0.87 lb/MMBtu, over 800% of its lowest demonstrated NOx reduction capacity. It is not because of low capacity factor nor MOT issues as the charts below demonstrate.

Plant	Unit	MW	NOx, Min	Nox, Min (Historical)*	NOx, Max	NOx, Max 03 Months
New Madrid	1	600	0.0991	0.08	0.8797	0.8797
New Madrid	2	600	0.1007	0.0764	1.0742	0.6420

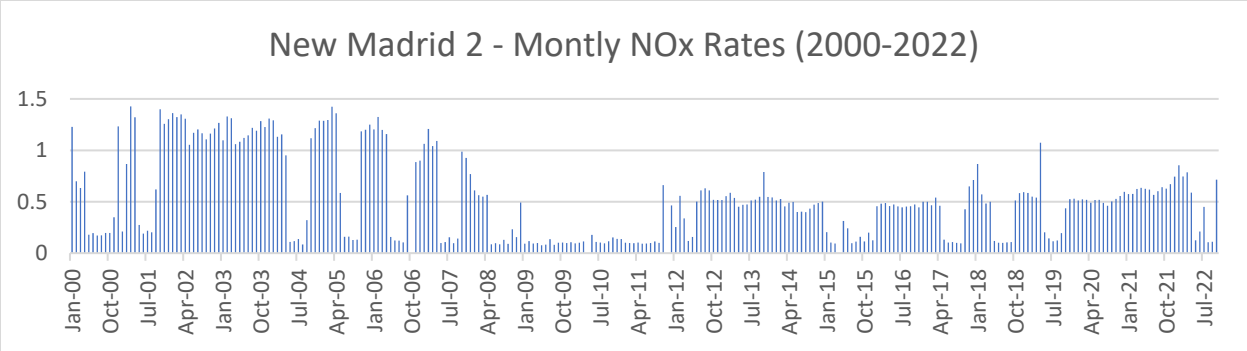


The chart above confirms that New Madrid 1 has reliably achieved levels below 0.10 lb/MMBtu, with a low of .0991 lb/MMBtu. The chart below shows that New Madrid Unit 1 has achieved levels less than approximately 0.10 lb/MMBtu over a range of ozone-season operating capacity factors.

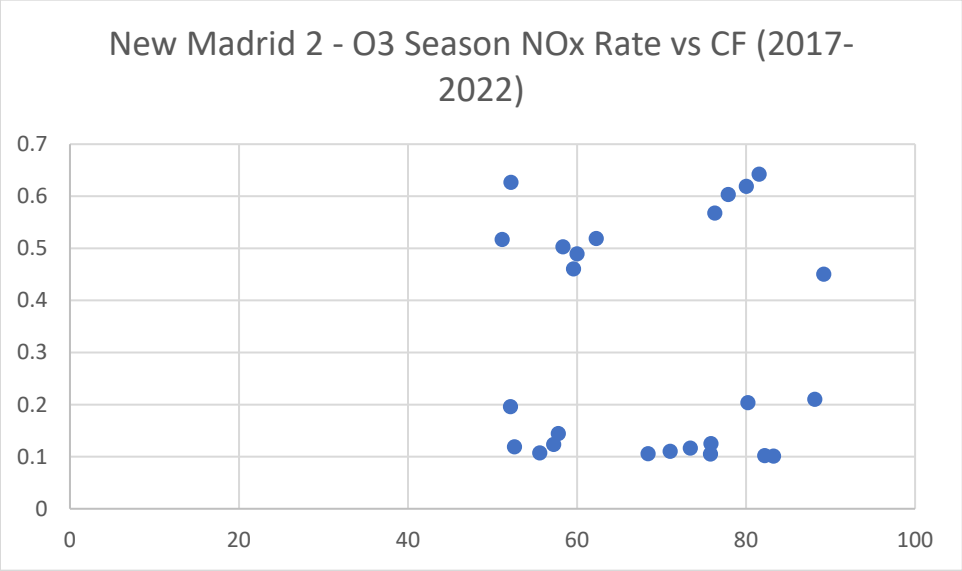


New Madrid 2: Unit 2 (600 MW) at the New Madrid plant was analyzed. Its NOx emissions rates are wildly variable. The unit can reliably achieve NOx emission rates below approximately 0.10 lb/MMBtu. It is clearly not operating its SCR according to the SCR's NOx reduction capacity. During some ozone seasons, it is emitting at 0.64 lb/MMBtu, over 600% of its lowest demonstrated NOx reduction capacity. It is not because of low capacity factor nor MOT issues as the charts below demonstrate.

Plant	Unit	MW	NOx, Min	Nox, Min (Historical)*	NOx, Max	NOx, Max 03 Months
New Madrid	1	600	0.0991	0.08	0.8797	0.8797
New Madrid	2	600	0.1007	0.0764	1.0742	0.6420

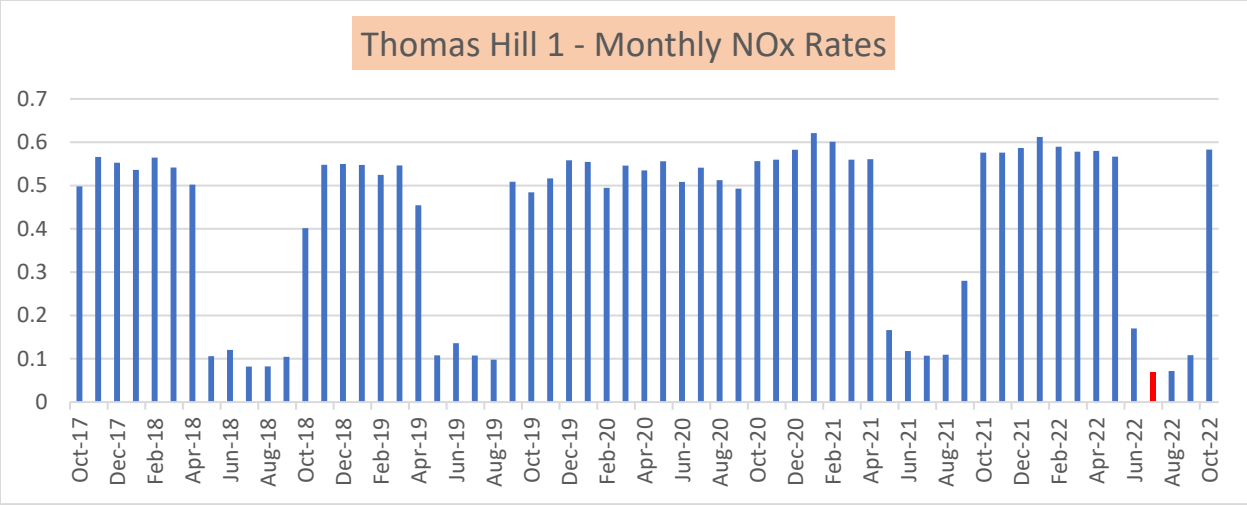


The chart above confirms that New Madrid 2 has reliably achieved levels of approximately 0.10 lb/MMBtu, with a low of .1007 lb/MMBtu. The chart below shows that New Madrid Unit 2 has achieved levels of approximately 0.10 lb/MMBtu over a range of ozone-season operating capacity factors.

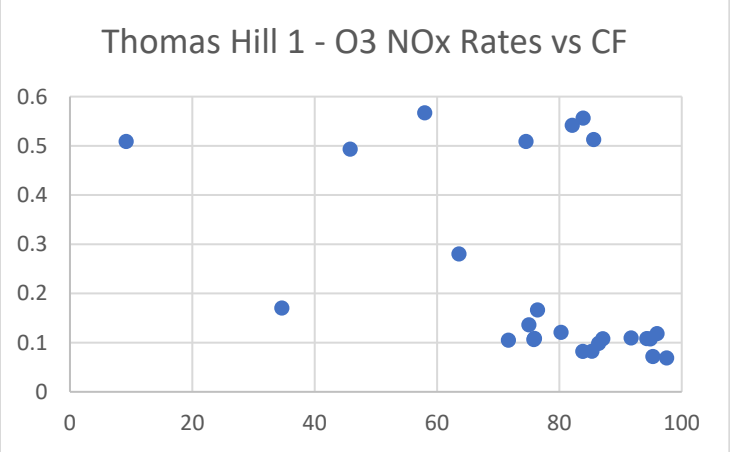


TH 1: Unit 1 (180 MW) at the Thomas Hill plant was analyzed. It has SCR installed. It can clearly achieve reliably lower NOx emission rates. The unit can reliably achieve NOx emission rates of 0.10 lb/MMBtu and below. It is not operating its SCR consistently in accordance with its lowest demonstrated NOx reduction capacity. It is not because of low capacity factor nor MOT issues as the charts below make clear. Indeed, its operation of its SCR is wildly erratic, including between ozone seasons.

Plant	Unit	MW	NOx, Min	NOx, Max	NOx, Max 03 Months
Thomas Hill	1	180	0.0686	0.6209	0.5668
Thomas Hill	2	285	0.0825	0.6374	0.5628
Thomas Hill	3	670	0.0775	0.2832	0.2832

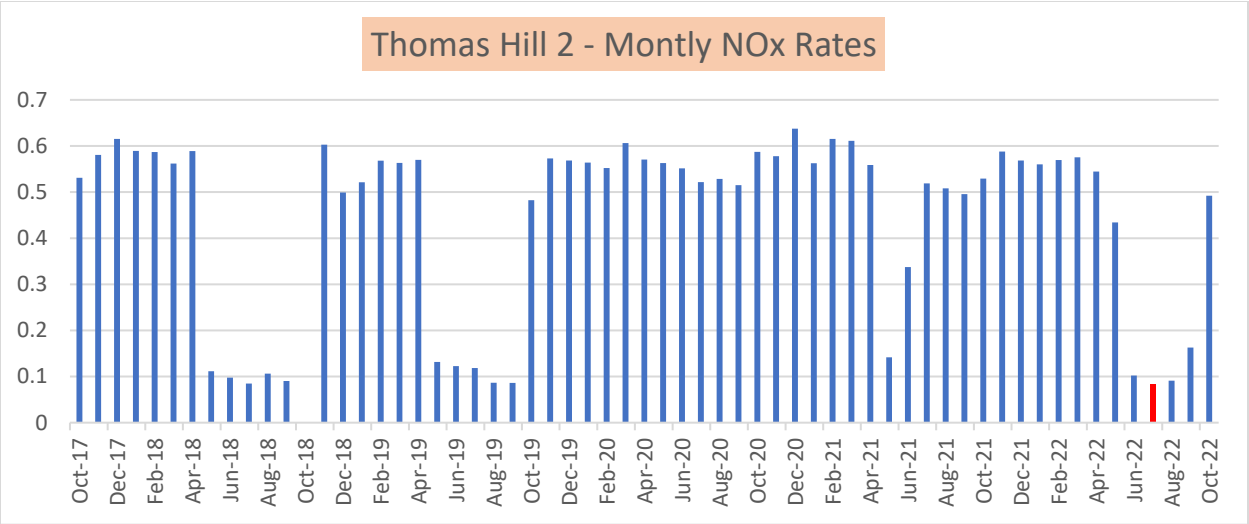


The chart above confirms that Thomas Hill 1 has reliably achieved levels below 0.10 lb/MMBtu, with a low of .0686 lb/MMBtu, shown in red. The chart below shows that Thomas Hill 1 has achieved less than 0.10 lb/MMBtu over a wide range of ozone-season operating capacity factors.

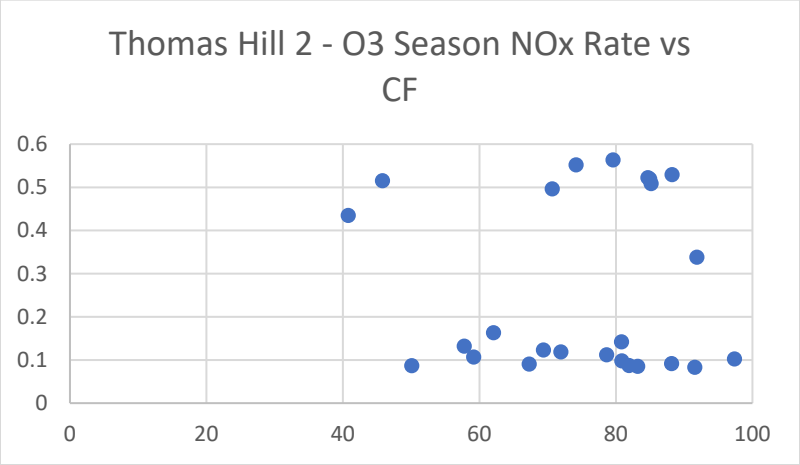


TH 2: Unit 2 (285 MW) at the Thomas Hill plant was analyzed. It has SCR installed. It can clearly achieve reliably lower NOx emission rates. The unit can reliably achieve NOx emission rates of 0.10 lb/MMBtu and below. It is not operating its SCR consistently in accordance with its lowest demonstrated NOx reduction capacity. It is not because of low capacity factor nor MOT issues as the charts below make clear. Indeed, its operation of its SCR is wildly erratic, including between ozone seasons.

Plant	Unit	MW	NOx, Min	NOx, Max	NOx, Max 03 Months
Thomas Hill	1	180	0.0686	0.6209	0.5668
Thomas Hill	2	285	0.0825	0.6374	0.5628
Thomas Hill	3	670	0.0775	0.2832	0.2832

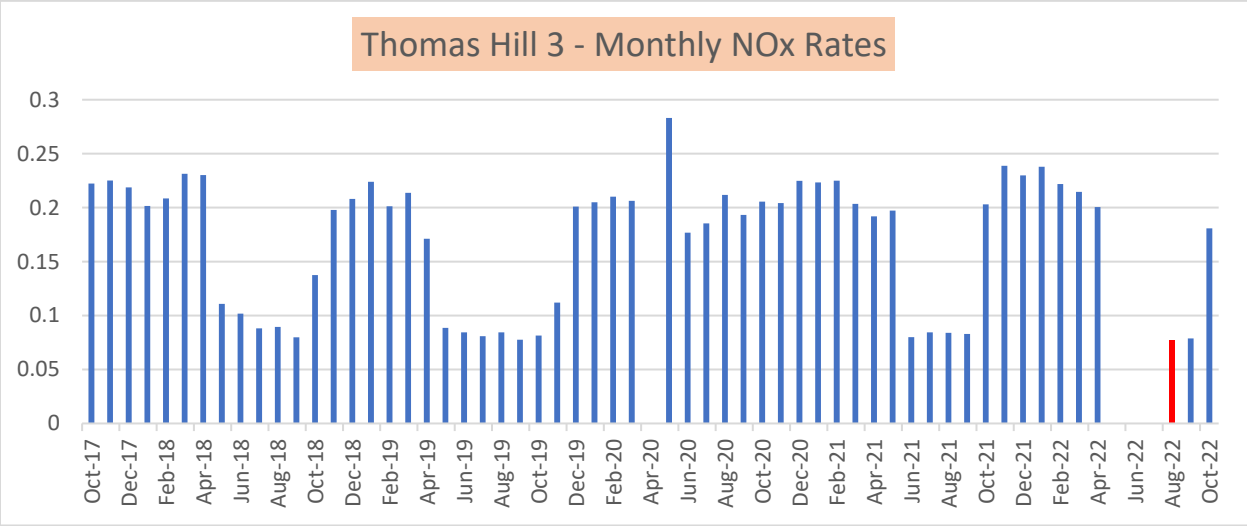


The chart above confirms that Thomas Hill 2 has achieved levels below 0.10 lb/MMBtu, with a low of .0825 lb/MMBtu, shown in red. The chart below shows that Thomas Hill 2 has achieved less than 0.10 lb/MMBtu over a wide range of ozone-season operating capacity factors.

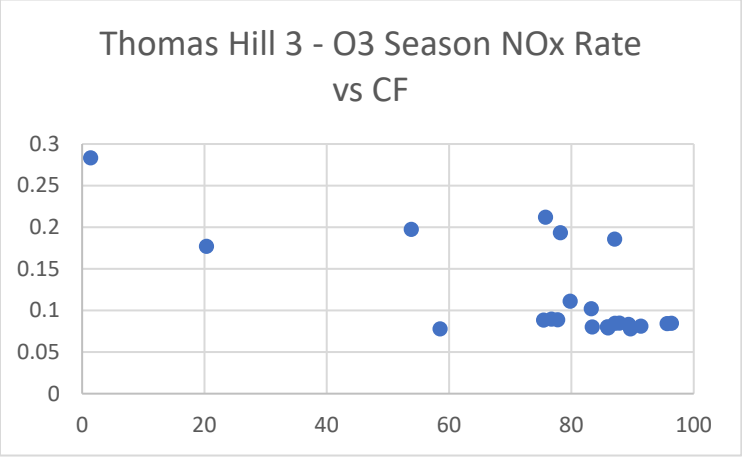


TH 3: Unit 3 (670 MW) at the Thomas Hill plant was analyzed. It has SCR installed. It can clearly achieve reliably lower NOx emission rates. The unit can reliably achieve NOx emission rates of 0.10 lb/MMBtu and below. It is not operating its SCR consistently in accordance with its lowest demonstrated NOx reduction capacity. It is not because of low capacity factor nor MOT issues as the charts below make clear. Indeed, its operation of its SCR is wildly erratic, including between ozone seasons.

Plant	Unit	MW	NOx, Min	NOx, Max	NOx, Max 03 Months
Thomas Hill	1	180	0.0686	0.6209	0.5668
Thomas Hill	2	285	0.0825	0.6374	0.5628
Thomas Hill	3	670	0.0775	0.2832	0.2832

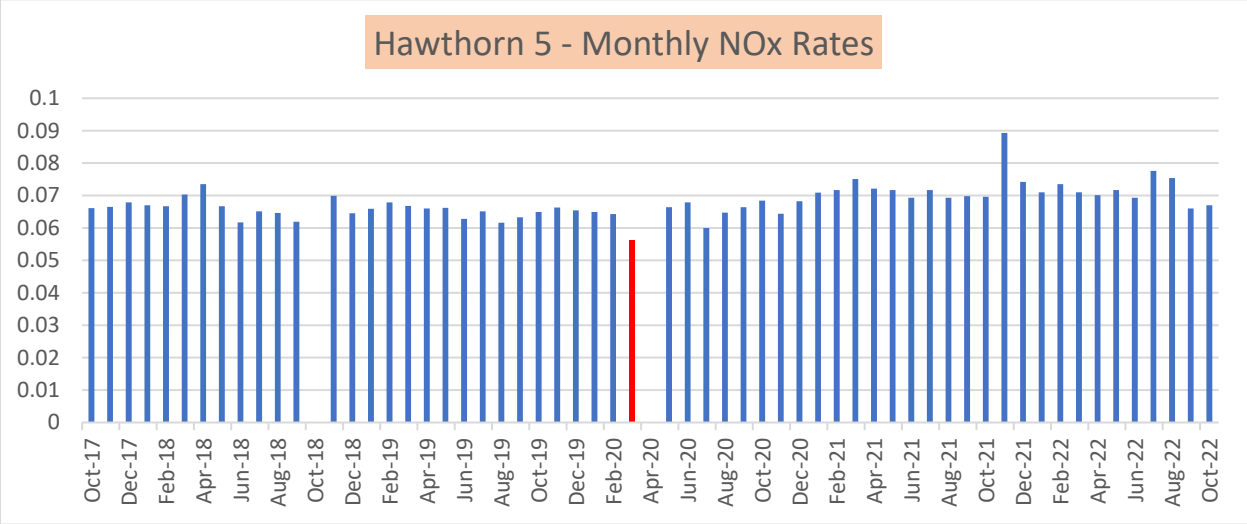


The chart above confirms that Thomas Hill 3 has achieved levels below 0.10 lb/MMBtu, with a low of .0775 lb/MMBtu, shown in red. The chart below shows that Thomas Hill 3 has achieved less than 0.10 lb/MMBtu over a wide range of ozone-season operating capacity factors.

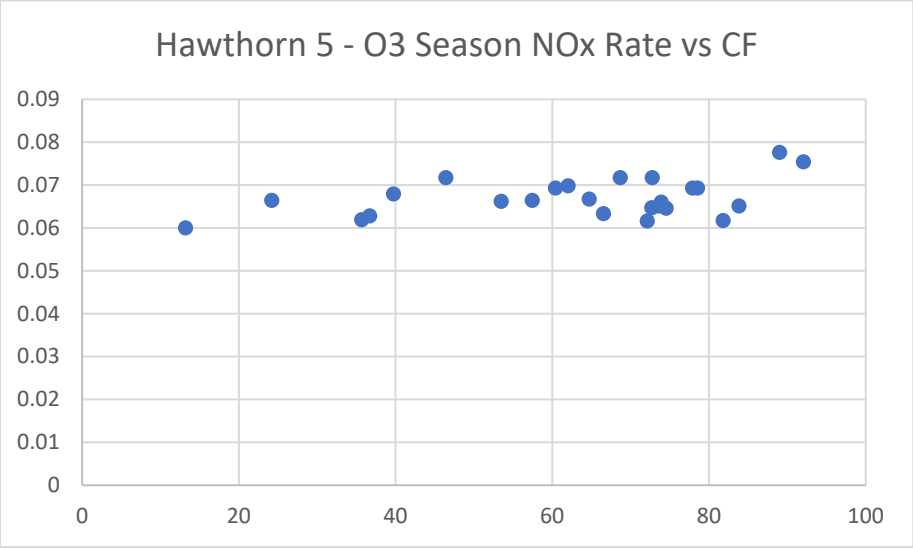


Hawthorn 5: Unit 5 (594 MW) at the Hawthorn plant was analyzed. It has SCR installed. The unit can reliably achieve NOx emissions rates of below 0.07 lb/MMBtu. It is not operating its SCR consistent with its lowest demonstrated NOx reduction capacity, and it is not because of low capacity factor nor MOT issues as the charts below make clear.

Plant	Unit	MW	NOx, Min	NOx, Max	NOx, Max 03 Months
Hawthorn	5	594	0.0563	0.0893	0.0776



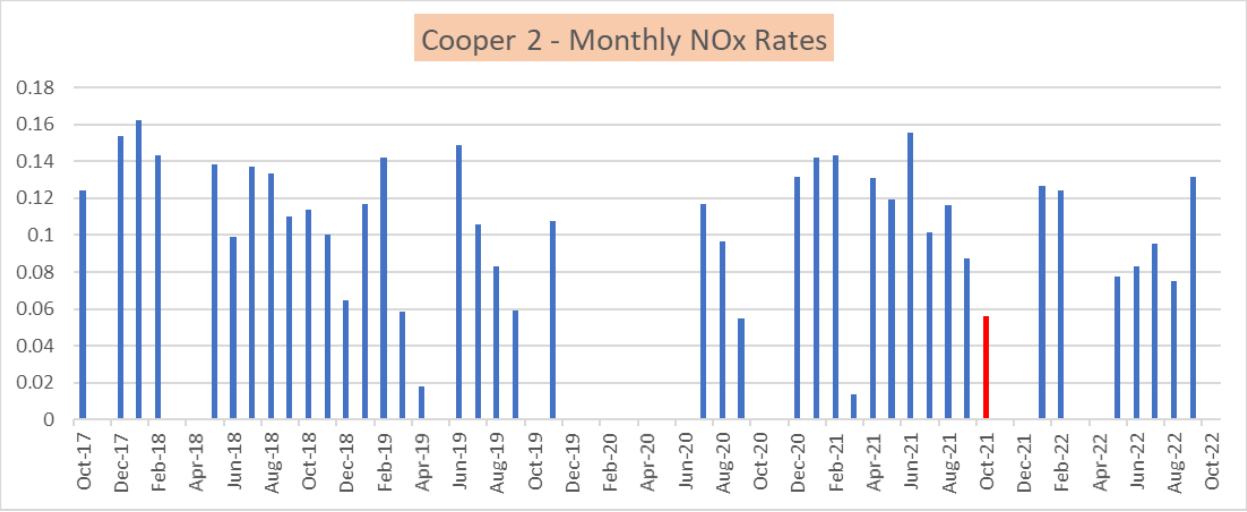
The chart above confirms that Hawthorn Unit 5 has achieved levels below 0.07 lb/MMBtu on many months of recent operation, with a low of 0.0563 lb/MMBtu, shown in red. The chart below shows that Hawthorn Unit 5 has achieved less than 0.07 lb/MMBtu over a range of ozone-season operating capacity factors.



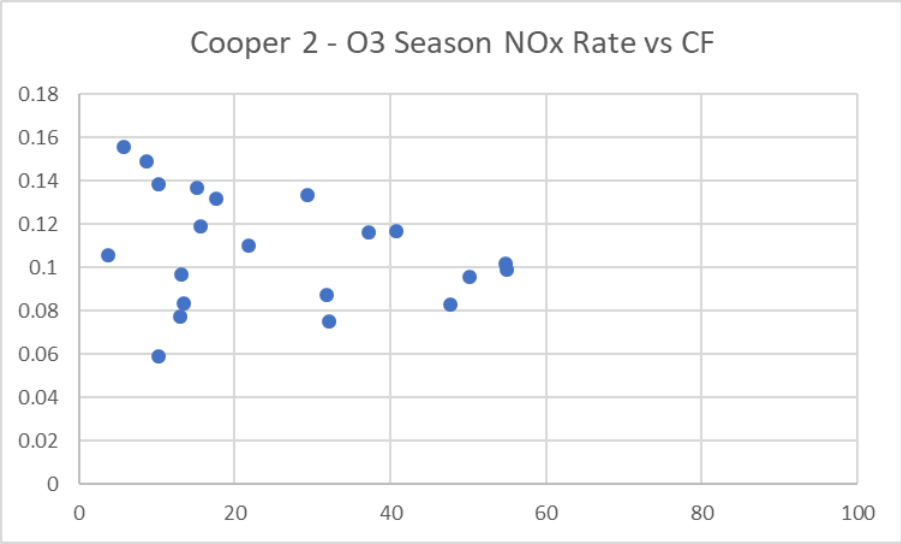
Kentucky

Cooper 2: Unit 2 (230 MW) at the Cooper plant was analyzed. It has SCR installed. It can achieve reliably lower NOx emission rates. The unit can reliably achieve NOx emissions rates of 0.10 lb/MMBtu and below. It is not operating its SCR consistently according to the SCR's lowest demonstrated NOx reduction capacity, and it is not because of low capacity factor nor MOT issues as the charts below make clear.

Plant	Unit	MW	NOx, Min	NOx, Max	NOx, Max 03 Months
Cooper	2	230	0.0563	0.1625	0.1554

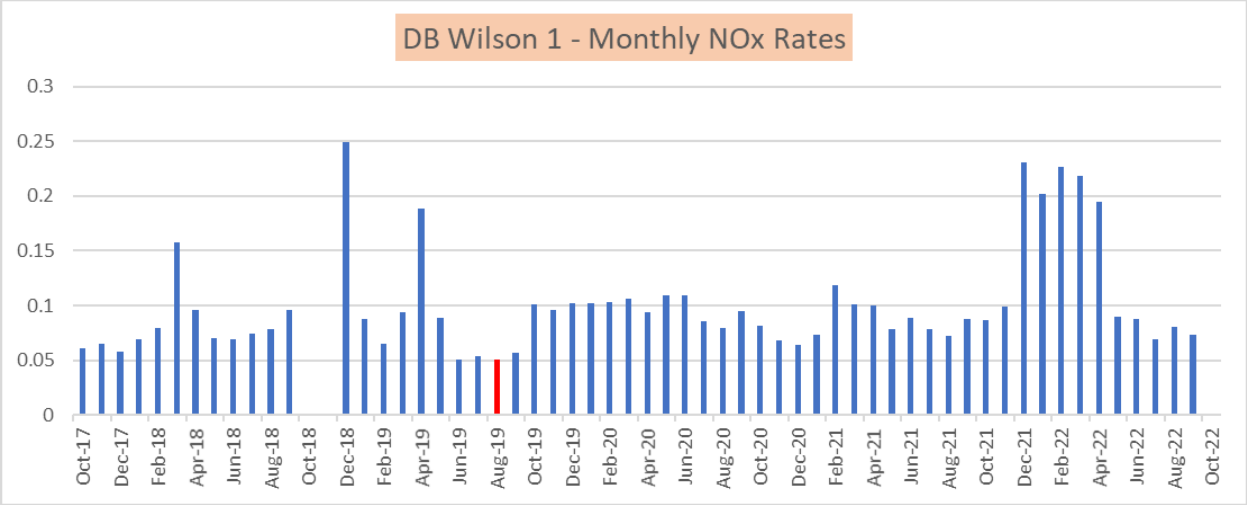


The chart above confirms that Cooper Unit 2 has achieved levels below 0.10 lb/MMBtu on many months of recent operation, with a low of 0.0563 lb/MMBtu, shown in red.

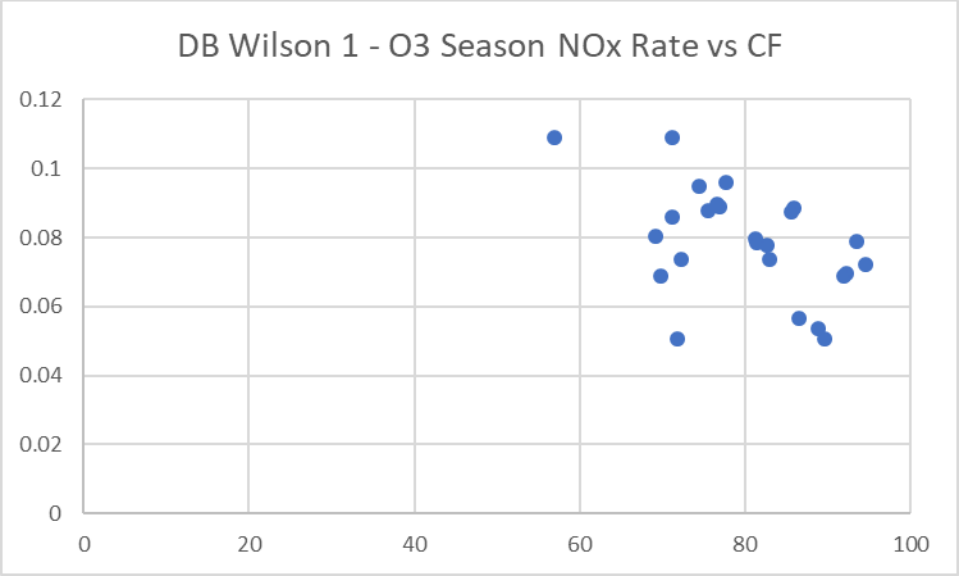


DB Wilson 1: Unit 1 (566 MW) at the DB Wilson plant was analyzed. It has SCR installed. It can reliably achieve NOx emission rates of below 0.07 lb/MMBtu. It is not operating its SCR consistently in accordance with its lowest demonstrated NOx reduction capacity, and it is not because of low capacity factor nor MOT issues as the charts below make clear.

Plant	Unit	MW	NOx, Min	NOx, Max	NOx, Max 03 Months
DB Wilson	1	566	0.0505	0.2491	0.1091

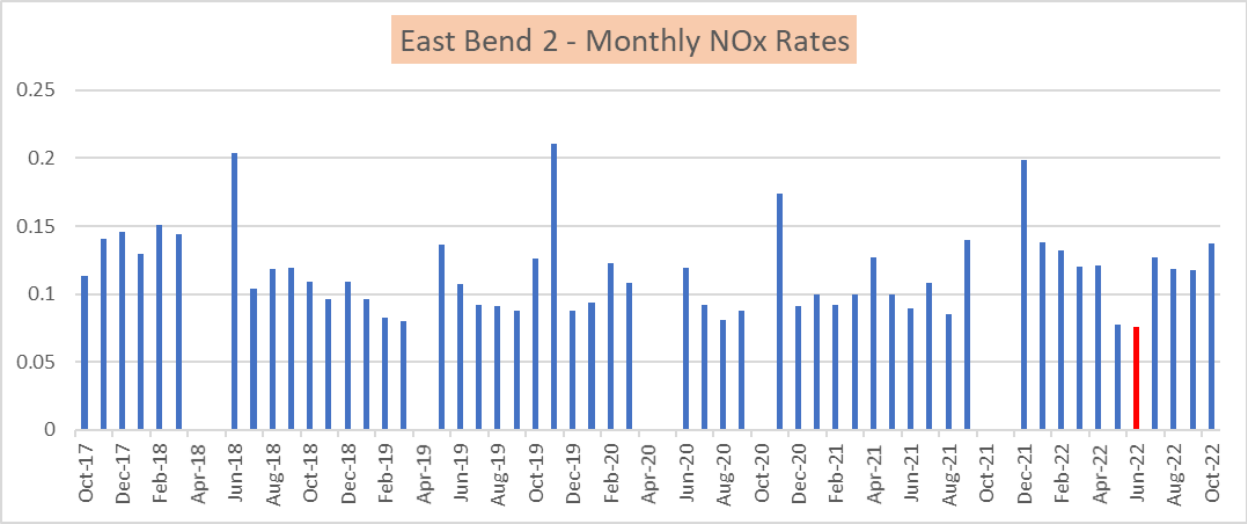


The chart above confirms that DB Wilson Unit 1 can reliably achieve levels below 0.07 lb/MMBtu on several months of operation, with a low of 0.0505 lb/MMBtu, shown in red. The chart below shows that DB Wilson Unit 1 has achieved less than 0.07 lb/MMBtu over a range of ozone-season operating capacity factors.

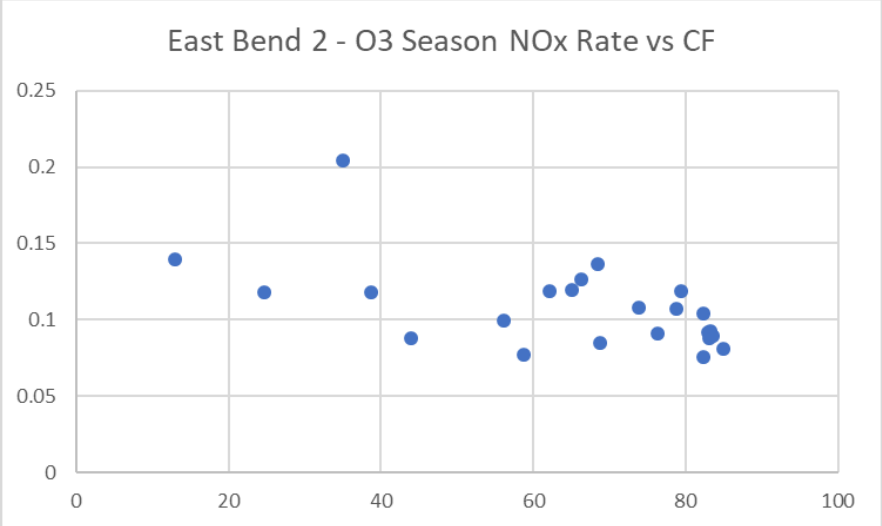


East Bend 2: Unit 2 (669 MW) at the East Bend plant was analyzed. It has SCR installed. It can reliably achieve NOx emission rates of 0.10 lb/MMBtu and below. It is not operating its SCR consistently in accordance with its lowest demonstrated NOx reduction capacity, and it is not because of low capacity factor nor MOT issues as the charts below make clear.

Plant	Unit	MW	NOx, Min	NOx, Max	NOx, Max 03 Months
East Bend	2	669	0.0758	0.2110	0.2041

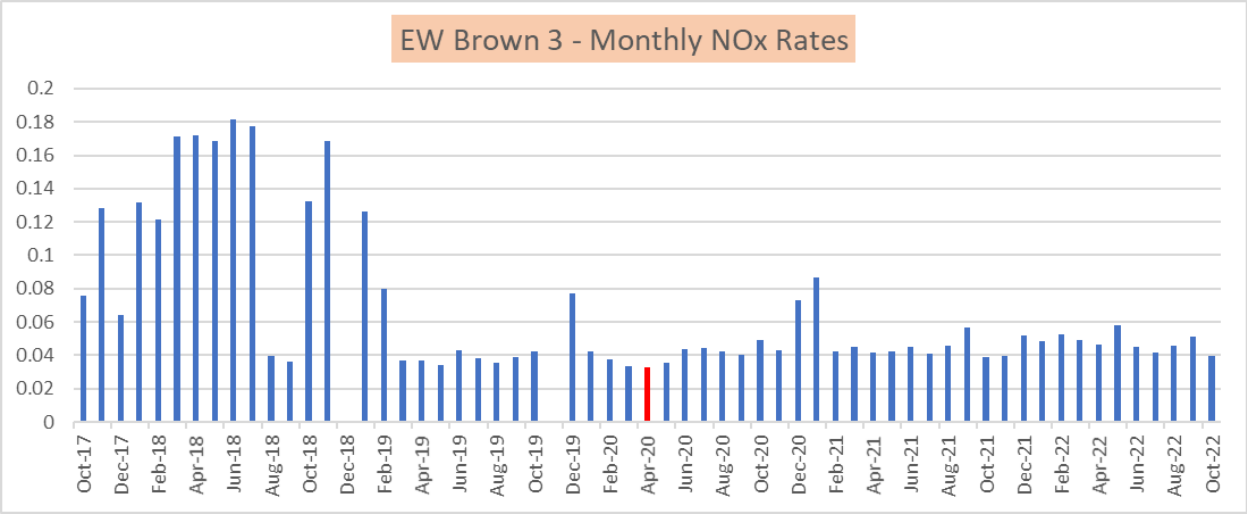


The chart above confirms that East Bend Unit 2 has regularly achieved levels of below 0.10 lb/MMBtu, with a low of 0.0758 lb/MMBtu, shown in red. The chart below shows that East Bend 2 has achieved less than 0.10 lb/MMBtu over a wide range of ozone-season operating capacity factors.

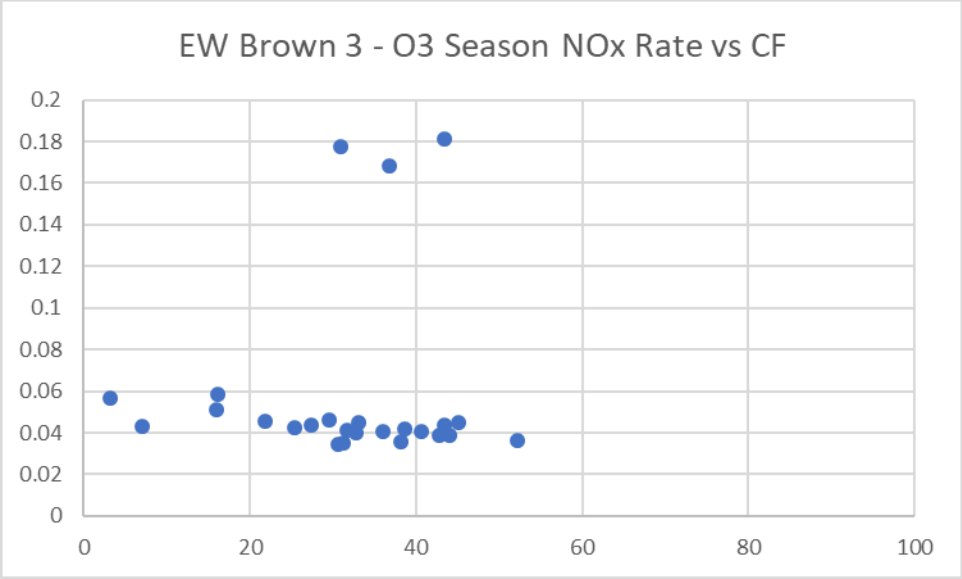


EW Brown 3: Unit 3 (464 MW) at the EW Brown plant was analyzed. It has SCR installed. It can reliably achieve NOx emission rates of approximately 0.04 lb/MMBtu.

Plant	Unit	MW	NOx, Min	NOx, Max	NOx, Max 03 Months
EW Brown	3	464	0.0326	0.1813	0.1813

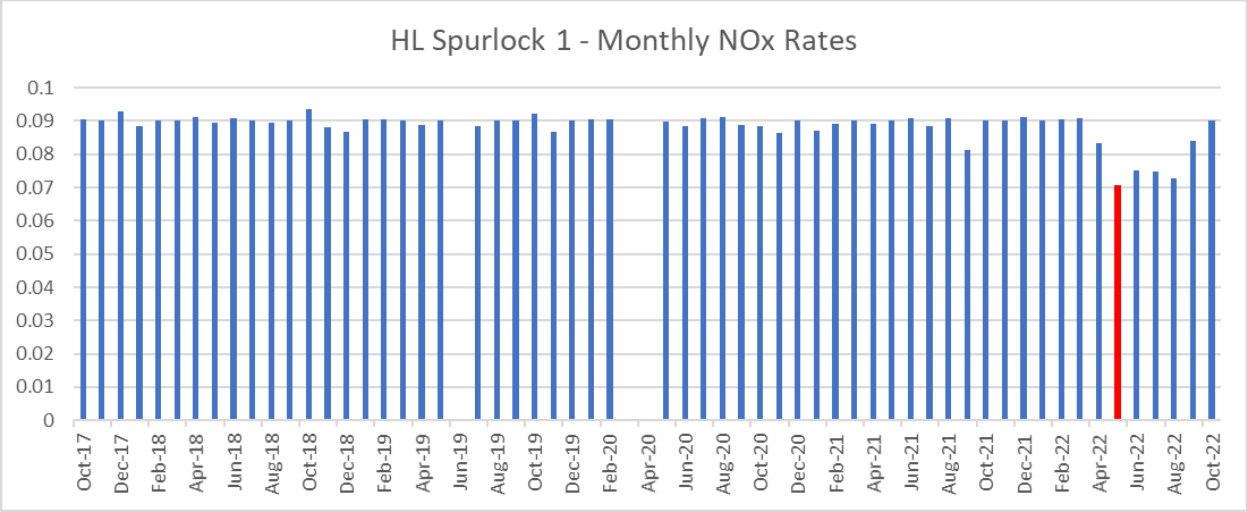


The chart above confirms that EW Brown Unit 3 has regularly achieved levels of approximately 0.04 lb/MMBtu, with a low of 0.0326 lb/MMBtu, shown in red. The chart below shows that EW Brown Unit 3 has achieved less than 0.04 lb/MMBtu over a wide range of ozone-season operating capacity factors.

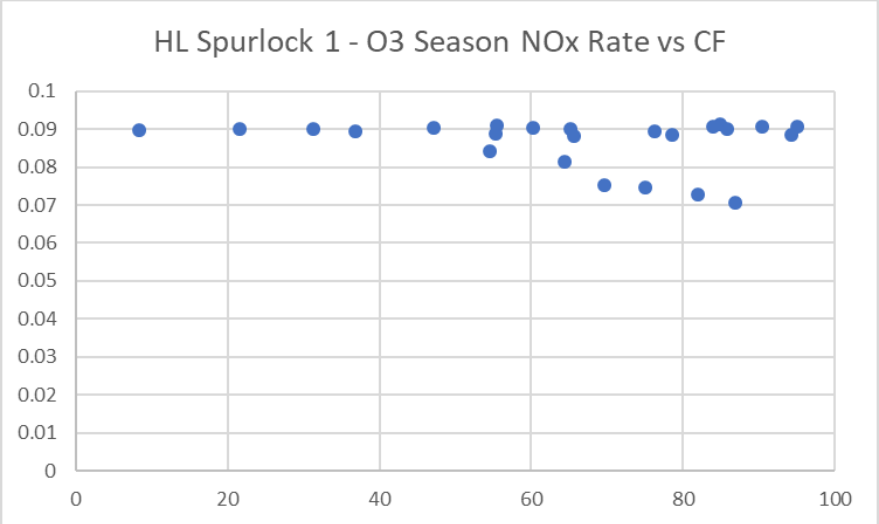


HL Spurlock 1: Unit 1 (385 MW) at the HL Spurlock plant was analyzed. It has SCR installed. It can reliably achieve NOx emission rates of 0.09 lb/MMBtu.

Plant	Unit	MW	NOx, Min	NOx, Max	NOx, Max 03 Months
HL Spurlock	1	358	0.0707	0.0936	0.0912
HL Spurlock	2	592	0.0604	0.1290	0.0921

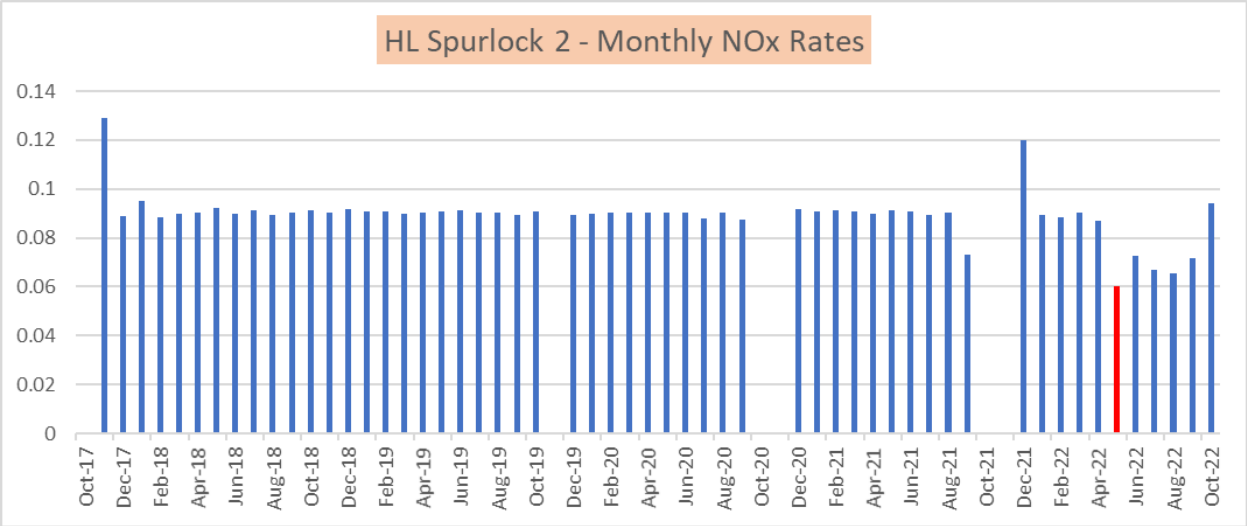


The chart above confirms that Spurlock Unit 1 reliably achieves NOx emissions of below 0.09 lb/MMBtu, and has maintained NOx emissions of below 0.08 lb/MMBtu during the 2022 ozone season, with a low of 0.0707 lb/MMBtu, shown in red. The chart below shows that Spurlock 1 has achieved less than 0.09 lb/MMBtu and below over a wide range of ozone-season operating capacity factors.

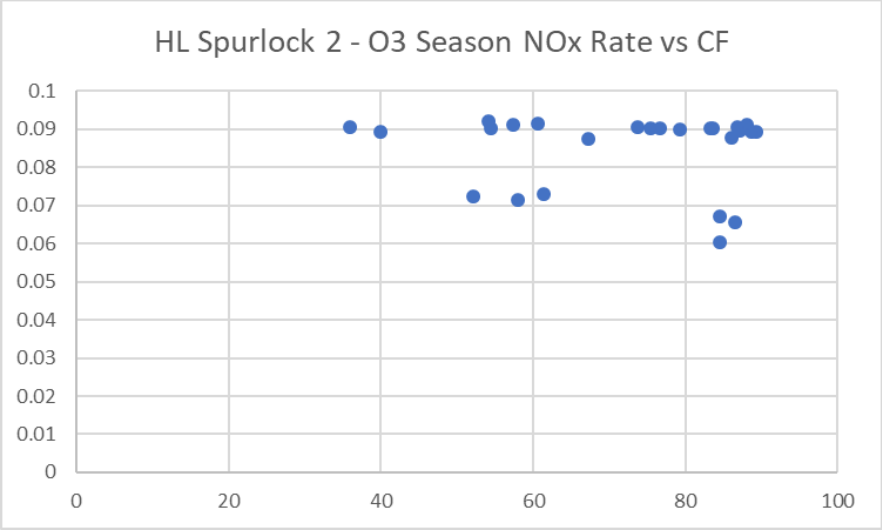


HL Spurlock 2: Unit 2 (592 MW) at the Spurlock 2 plant was analyzed. It has SCR installed. It can reliably achieve NOx emission rates of 0.09 lb/MMBtu.

Plant	Unit	MW	NOx, Min	NOx, Max	NOx, Max 03 Months
HL Spurlock	1	358	0.0707	0.0936	0.0912
HL Spurlock	2	592	0.0604	0.1290	0.0921

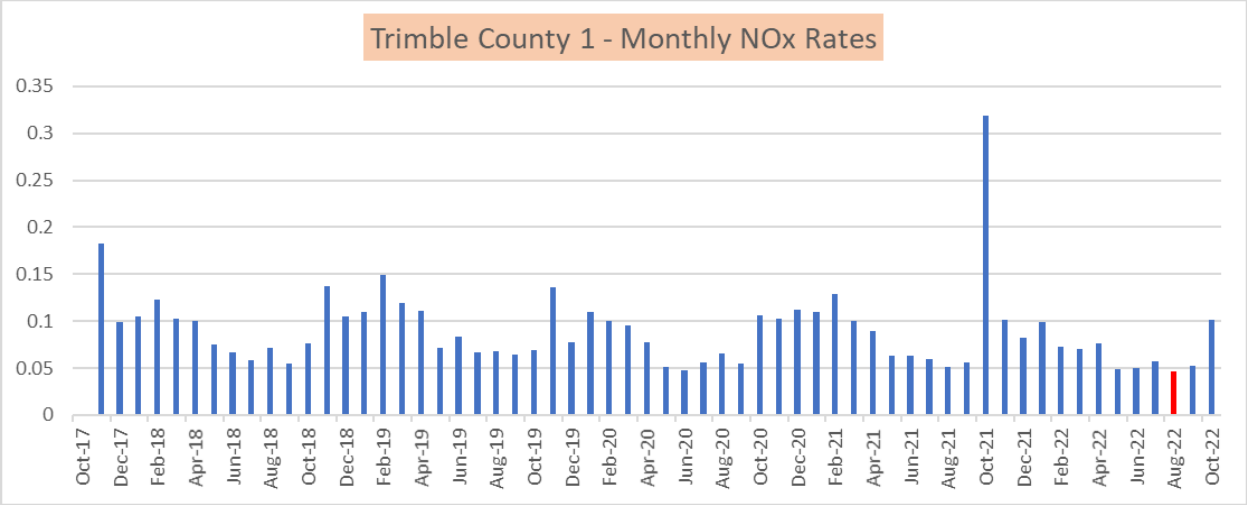


The chart above confirms that Spurlock Unit 2 reliably achieves NOx emissions of below 0.09 lb/MMBtu, and has maintained NOx emissions of below 0.08 lb/MMBtu during the 2022 ozone season, with a low of 0.0604 lb/MMBtu, shown in red. The chart below shows that Spurlock 2 has achieved less than 0.09 lb/MMBtu and below over a range of ozone-season operating capacity factors.

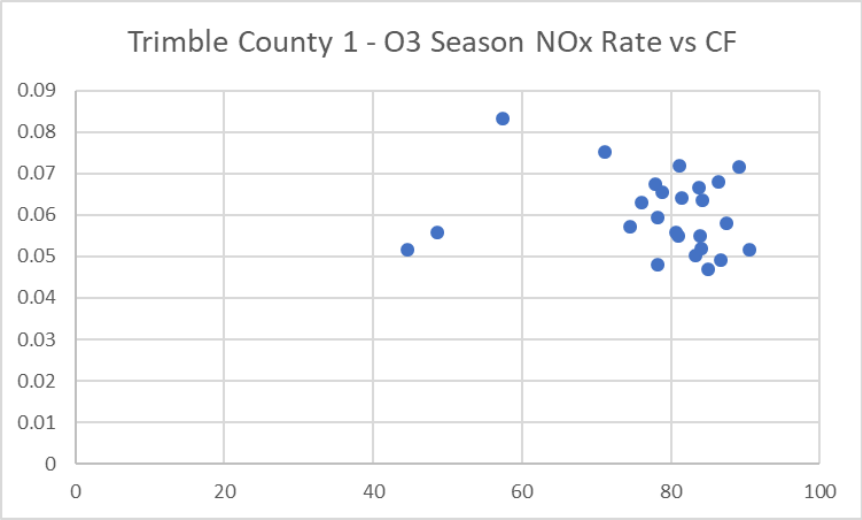


TC 1: Unit 1 (566 MW) at the Trimble County plant was analyzed. It has SCR installed. It can reliably achieve NOx emission rates of 0.07 lb/MMBtu and below, regularly achieving approximately 0.05 lb/MMBtu during ozone seasons 2022, 2021, and 2020. It is clearly not operating its SCR according to the SCR's NOx reduction capacity, and it is not because of low capacity factor nor MOT issues as the charts below make clear.

Plant	Unit	MW	NOx, Min	NOx, Max	NOx, Max 03 Months
Trimble County	1	566	0.0470	0.3192	0.0832
Trimble County	2	834	0.0257	0.3788	0.0757

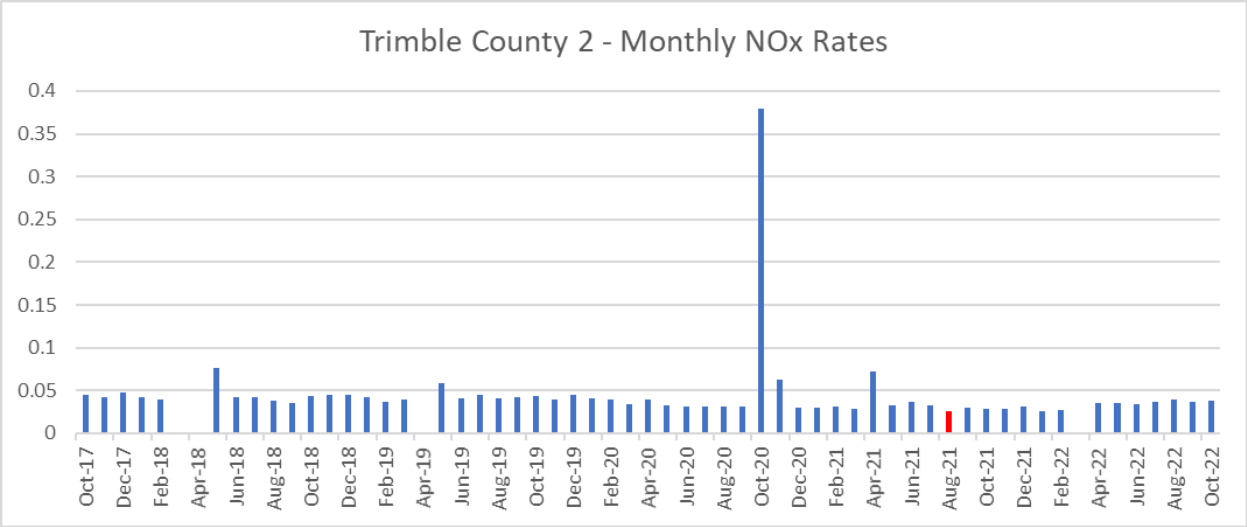


The chart above confirms that Trimble County 1 has achieved levels below 0.05 lb/MMBtu, with a low of .0470 lb/MMBtu, shown in red. The chart below shows that Trimble County 1 has achieved less than 0.05 lb/MMBtu over a range of ozone-season operating capacity factors.

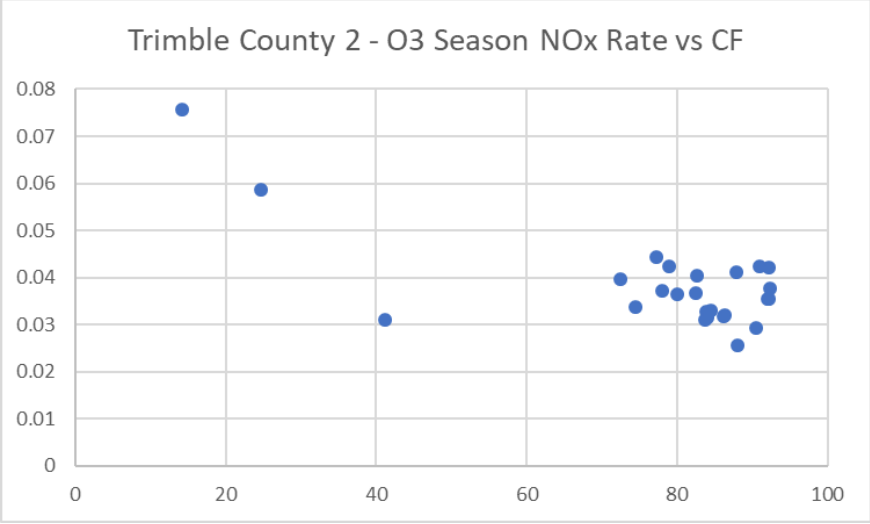


TC 2: Unit 2 (834 MW) at the Trimble County plant was analyzed. It has SCR installed. It can reliably achieve NOx emission rates below 0.05 lb/MMBtu.

Plant	Unit	MW	NOx, Min	NOx, Max	NOx, Max 03 Months
Trimble County	1	566	0.0470	0.3192	0.0832
Trimble County	2	834	0.0257	0.3788	0.0757

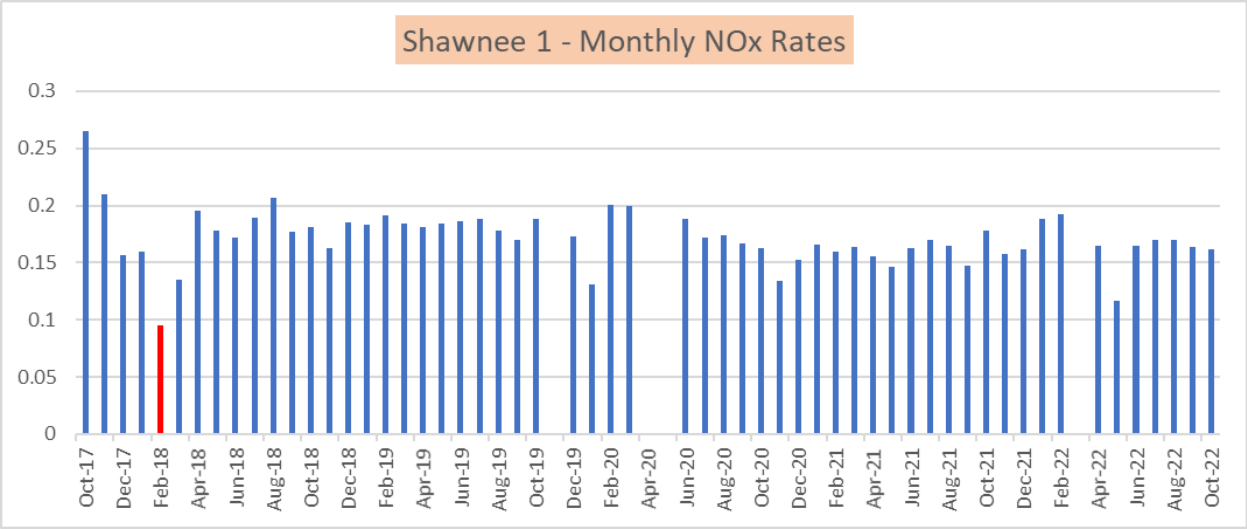


The chart above confirms that Trimble County 2 has often achieved levels well below 0.05 lb/MMBtu, with a low of .0257 lb/MMBtu, shown in red. The chart below shows that Trimble County 2 has achieved less than 0.05 lb/MMBtu over a range of ozone-season operating capacity factors.

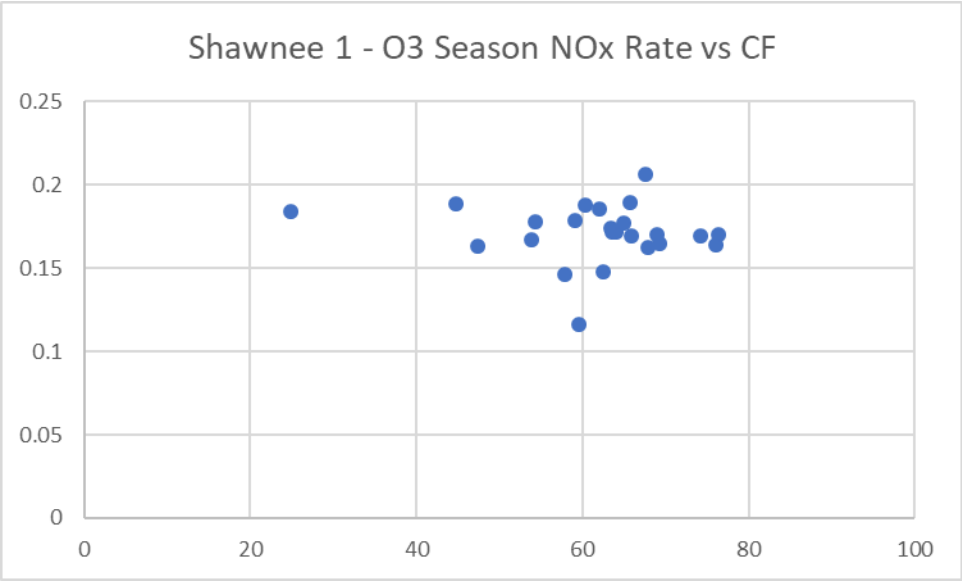


Shawnee 1: Unit 1 (175 MW) at the Shawnee plant was analyzed. It has SCR installed. Its NOx emissions rates, which are regularly above 0.15 lb/MMBtu, are inconsistent with the capabilities of SCR technology.

Plant	Unit	MW	NOx, Min	Nox, Min (Historical)*	NOx, Max	NOx, Max 03 Months
Shawnee	1	175	0.0954	N/A	0.2655	0.2063
Shawnee	4	175	0.1045	0.1045	0.2517	0.2057

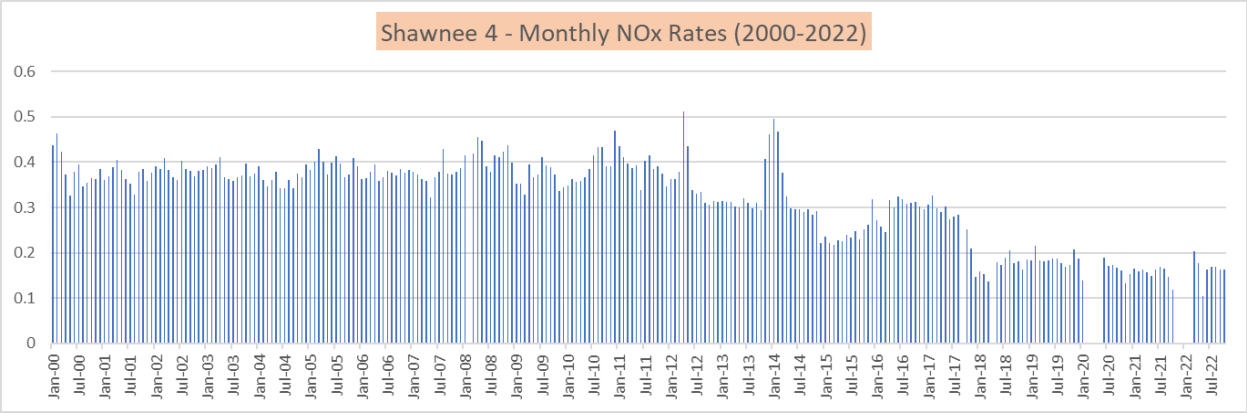


The chart above confirms that Shawnee 1 has consistently exceeded 0.15 lb/MMBtu, and on occasion has been shown to reduce NOx emissions rates to below 0.10 lb/MMBtu, with a low of .0954 lb/MMBtu, shown in red. The chart below shows that Shawnee 1's high emission rates are consistent over a wide range of ozone-season operating capacity factors.

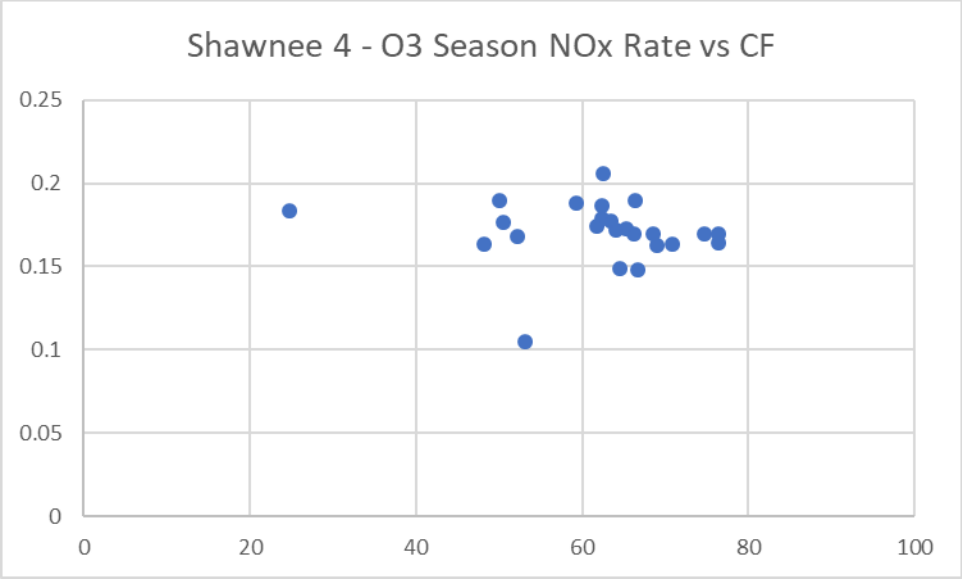


Shawnee 4: Unit 4 (175 MW) at the Shawnee plant. It has SCR installed. Its NOx emissions rates, which are regularly above 0.15 lb/MMBtu, are inconsistent with the capabilities of SCR technology.

Plant	Unit	MW	NOx, Min	Nox, Min (Historical)*	NOx, Max	NOx, Max 03 Months
Shawnee	1	175	0.0954	N/A	0.2655	0.2063
Shawnee	4	175	0.1045	0.1045	0.2517	0.2057

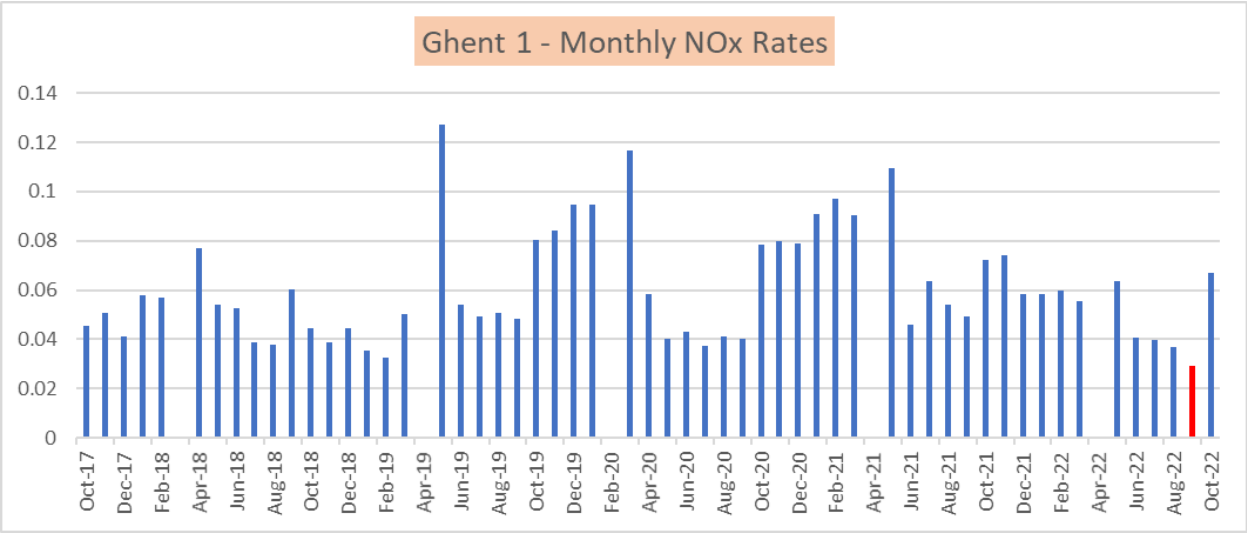


The chart above confirms that Shawnee 4 consistently emits at very high NOx emissions rates, often in excess of 0.15 lb/MMBtu, even during ozone seasons, with a low of .1045 lb/MMBtu, shown in red. The chart below shows that Shawnee 4's high emission rates are consistent over a wide range of ozone-season operating capacity factors.

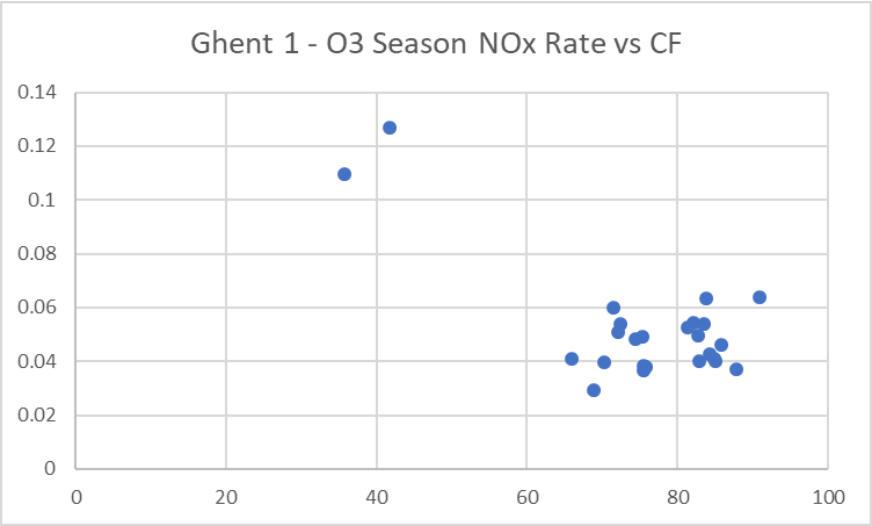


Ghent 1: Unit 1 (557 MW) at the Ghent plant was analyzed. It has SCR installed. It can reliably achieve NOx emission rates of below 0.04 lb/MMBtu. It is not operating its SCR consistently in accordance with its lowest demonstrated NOx reduction capabilities, and it is not because of low capacity factor nor MOT issues as the charts below make clear.

Plant	Unit	MW	NOx, Min	Nox, Min (Historical)*	NOx, Max	NOx, Max 03 Months
Ghent	1	557	0.0292	N/A	0.1271	0.1271
Ghent	2	556	0.1383	0.1362	0.3045	0.2192
Ghent	3	557	0.0627	N/A	0.3012	0.2059
Ghent	4	556	0.0268	N/A	0.1504	0.0842

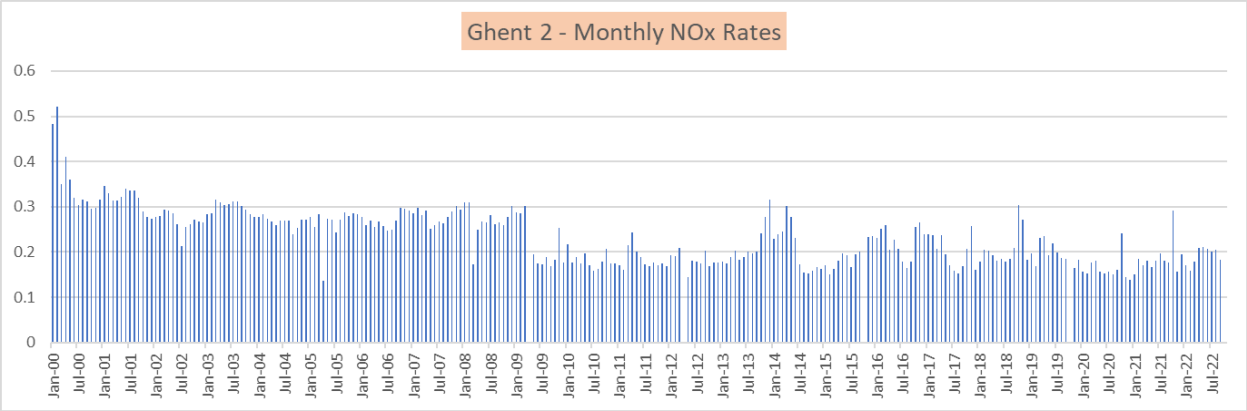


The chart above confirms that Ghent 1 has achieved levels below 0.04 lb/MMBtu, with a low of .0292 lb/MMBtu, shown in red. The chart below shows that Ghent 1 has achieved less than 0.04 lb/MMBtu over a range of ozone-season operating capacity factors.

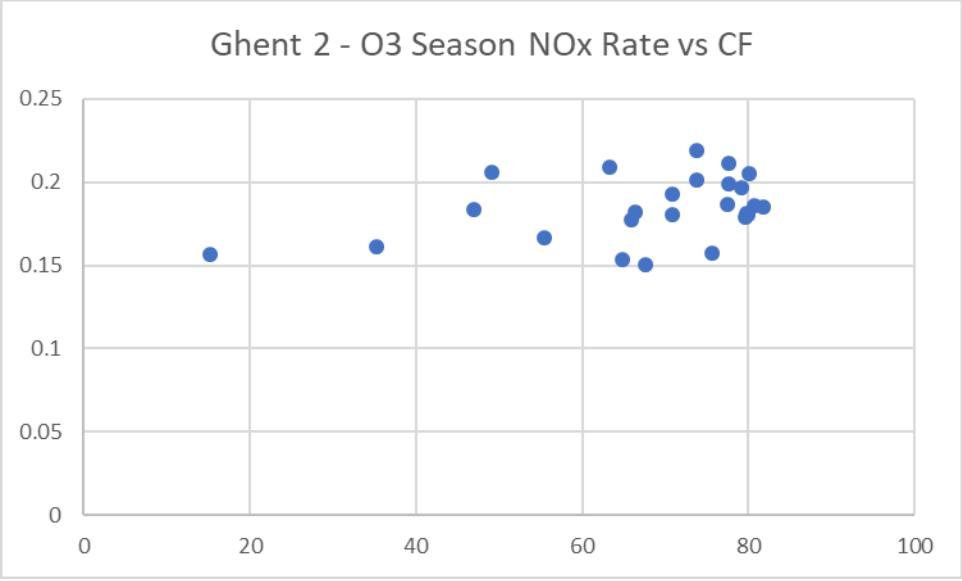


Ghent 2: Unit 2 (556 MW) at the Ghent plant was analyzed. It has SCR installed. Its NOx emissions rates, which are regularly above 0.15 lb/MMBtu, are inconsistent with the capabilities of SCR technology.

Plant	Unit	MW	NOx, Min	Nox, Min (Historical)*	NOx, Max	NOx, Max 03 Months
Ghent	1	557	0.0292	N/A	0.1271	0.1271
Ghent	2	556	0.1383	0.1362	0.3045	0.2192
Ghent	3	557	0.0627	N/A	0.3012	0.2059
Ghent	4	556	0.0268	N/A	0.1504	0.0842

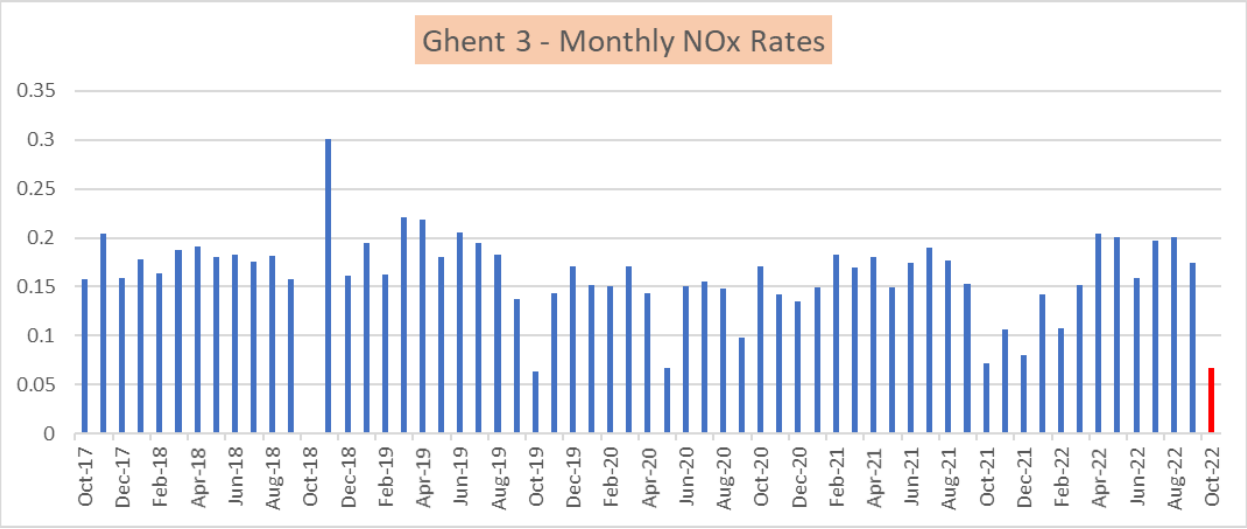


The chart above confirms that Ghent 2 consistently emits at very high NOx emissions rates, often in excess of 0.15 lb/MMBtu, even during ozone seasons, with a low of .1383 lb/MMBtu, shown in red. The chart below shows that Ghent 2's high emission rates are consistent over a wide range of ozone-season operating capacity factors.

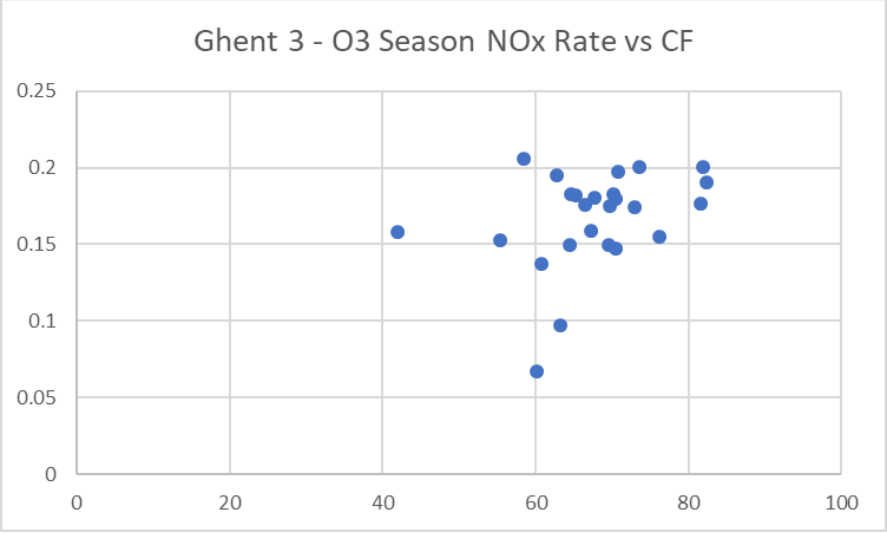


Ghent 3: Unit 3 (557 MW) at the Ghent plant was analyzed. It has SCR installed. Its NOx emissions rates, which are regularly above 0.15 lb/MMBtu, are inconsistent with the capabilities of SCR technology.

Plant	Unit	MW	NOx, Min	Nox, Min (Historical)*	NOx, Max	NOx, Max 03 Months
Ghent	1	557	0.0292	N/A	0.1271	0.1271
Ghent	2	556	0.1383	0.1362	0.3045	0.2192
Ghent	3	557	0.0627	N/A	0.3012	0.2059
Ghent	4	556	0.0268	N/A	0.1504	0.0842

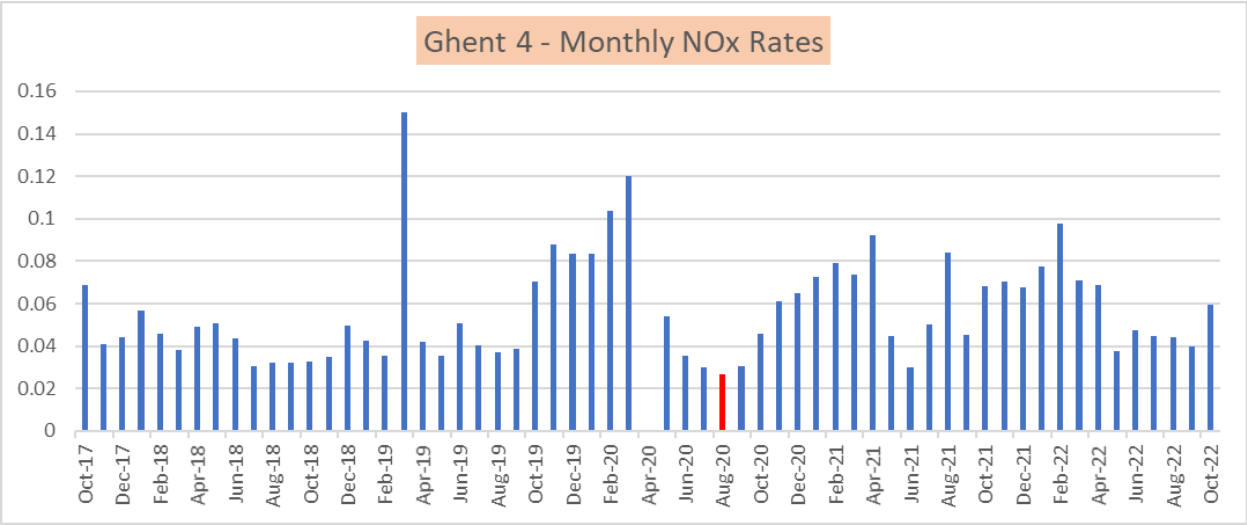


The chart above confirms that Ghent 3 consistently emits at very high NOx emissions rates, often in excess of 0.15 lb/MMBtu, even during ozone seasons, with a low of .0627 lb/MMBtu, shown in red. The chart below shows that Ghent 3's high emission rates are consistent over a wide range of ozone-season operating capacity factors.



Ghent 4: Unit 3 (556 MW) at the Ghent plant was analyzed. It has SCR installed. It can reliably achieve NOx emission rates below 0.04 lb/MMBtu. It is not operating its SCR consistently in accordance with its lowest demonstrated NOx reduction capacity, and it is not because of low capacity factor nor MOT issues as the charts below make clear.

Plant	Unit	MW	NOx, Min	Nox, Min (Historical)*	NOx, Max	NOx, Max 03 Months
Ghent	1	557	0.0292	N/A	0.1271	0.1271
Ghent	2	556	0.1383	0.1362	0.3045	0.2192
Ghent	3	557	0.0627	N/A	0.3012	0.2059
Ghent	4	556	0.0268	N/A	0.1504	0.0842



The chart above confirms that Ghent 4 has often achieved levels below 0.04 lb/MMBtu, with a low of .0268 lb/MMBtu, shown in red. The chart below shows that Ghent 4 has achieved less than 0.04 lb/MMBtu over a wide range of ozone-season operating capacity factors.