



Alexandria/Arlington Resource Recovery Facility
Fiscal Year 2015
Third Quarter Operating Report



May
2015

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Definition of Abbreviations & Acronyms

Abbreviation/Acronym

APC
Apr
Aug
Avg
Btu
CAAI
CEMS
CO
Dec
Feb
FMG
FY
gal
GAT
HCl
HDR
ID
Jan
Jul
Jun
klbs
kWhr
lbs
LOA
Mar
Max
May
Min
MSW
MWhr
No
NOV
Nov
NO_x
Oct

OSHA
PDS
ppm
ppmdv
PSD
Q1
Q2
Q3
Q4
RE
RNE
SDA
Sep
SO₂
TCLP

VADEQ
WL
yr
YTD

Definition

Air Pollution Control
April
August
Average
British thermal unit
Covanta Alexandria Arlington, Inc.
Continuous Emissions Monitoring System
Carbon Monoxide
December
February
Facility Monitoring Group
Fiscal Year
Gallon
Guaranteed Annual Tonnage
Hydrochloric (Hydrogen Chlorides)
HDR Engineering Inc
Induced Draft
January
July
June
Kilo-pounds (1,000 lbs)
Kilowatt hours (1,000 watt-hours)
Pounds
Letter of Agreement
March
Maximum
May
Minimum
Municipal Solid Waste
Megawatt hours
Number
Notice of Violation
November
Nitrogen Oxide
October
Occupational Safety and Health
Administration
Potomac Disposal Services
Parts per million
Parts per million dry volume
Prevention of Significant Deterioration
First Quarter
Second Quarter
Third Quarter
Fourth Quarter
Reportable Exempt
Reportable Non-Exempt
Spray Dryer Absorber
September
Sulfur Dioxide
Toxicity Characteristic Leaching Procedure
Virginia Department of Environmental
Quality
Warning Letter
Year
Year to date

Alexandria/Arlington Waste-to-Energy Facility Third Quarter Operating Report – Fiscal Year 2015

1.0 Purpose of Report

HDR Engineering, Inc. (HDR) was given authorization by the Facility Monitoring Group (FMG) to conduct quarterly inspections and provide quarterly monitoring reports regarding the operation and maintenance of the Covanta Alexandria/Arlington Waste-to-Energy Facility (Facility) for the 2015 calendar year. This report is prepared for the third quarter of the 2015 fiscal year and summarizes Facility operations between January 1, 2015 and March 31, 2015. This report identifies the fiscal year beginning on July 1, 2014 as FY15 and the quarter beginning on January 1, 2015 as Q3FY15.

This report is based upon the experience HDR has in the waste-to-energy industry, upon site observation visits and previous reports provided by HDR, and upon data provided by Covanta Alexandria / Arlington, Inc. (CAAI), the Facility owner and operator.

2.0 Executive Summary

CAAI operated the Facility in an acceptable manner and in accordance with established waste-to-energy industry practices during Q3FY15. The operation of the Facility, maintenance, safety, and overall cleanliness continue to be above average. Environmental performance was excellent with no reportable environmental excursions throughout the quarter.

During Q3FY15, the Facility experienced three (3) instances of unscheduled downtime for the boilers totaling 44.5 hours, and no unscheduled downtime for the turbine generators. Beginning January 24, 2015, Boiler No. 3 experienced 137.8 hours of downtime for scheduled maintenance. Beginning February 28, 2015, Boiler No. 2 experienced 139.0 hours of downtime for scheduled maintenance. Beginning March 7, 2015, Boiler No. 1 experienced 140.0 hours of downtime for scheduled maintenance. The boilers experienced four (4)

instances of standby time totaling 107.0 hours, and the turbine generators experienced two (2) instances of standby time totaling 132.1 hours during the quarter. A detailed listing of downtime is provided in Section 5.2 of this report.

Average waste processed during the quarter was 909.7 tons per day, or 93.3% of nominal facility capacity. Waste deliveries averaged 905.6 tons per day, which is 0.5% lower than the burn rate. The capacity utilization of 93.3% compares favorably to industry averages, which are generally in the 88% to 92% range.

Performance trends for various measurements are presented in Section 4. In general, the Facility continues to demonstrate reasonable consistency in month to month performance throughout the most recent three-year period tracked for detailed comparisons.

During the quarter, MSW processed decreased 0.4% from the corresponding quarter in FY14; steam production decreased 1.6%, and electricity generated (gross) decreased 2.1% from the corresponding quarter in FY14. The decrease in steam generation was attributable to throttling the boilers to remain below the steam permit monthly limits. The decrease in gross electrical generation in Q3FY15 as compared to Q3FY14 is attributable to the decrease in steam production.

3.0 Facility Inspection and Records Review

In February 2015, HDR met with the Facility management and other plant personnel to discuss Facility operations and maintenance, acquire Facility data and reports, perform an independent visual inspection of the operating Facility, photograph areas of interest, and perform a review of recent Facility activity. This visit was coordinated with the scheduled FMG Meeting. At the time of the visit, HDR reviewed CAAI records, discussed performance issues with CAAI staff, and provided a verbal report and performance statistics. HDR maintains a running tabulation of the status of corrective actions and plant performance trends. CAAI 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 audit 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 at the earliest convenience, but is not a priority issue. This category might include issues related to aesthetics, non-urgent maintenance, or housekeeping improvements which are not safety related.

Table 1: Summary of Audit 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.	Audit Report Deficiencies	Issue Reported	Priority*	Resolution/Status	Date Resolved	Open / Closed
1	Spider cracking at scale entry area	July 2010	C	Repair	February 2015	Closed
2	Pothole at truck entry roadway	May 2012	C	Repair	February 2015	Closed
3	Concrete to roadway drain at truck entrance damaged – exposing reinforcing bar	May 2014	C	Repair damaged concrete		Open
4	Turbine Generator Enclosure Roof Leaking (3 Locations Observed)	August 2014	C	Repair roof	February 2015	Closed
5	Corrosion on ceiling panels in Turbine Generator Enclosure	August 2014	C	Sand, Prime, Paint and Preserve		Open
6	Corrosion on ceiling panels in Turbine Generator Enclosure (Alternate Location)	August 2014	C	Sand, Prime, Paint and Preserve		Open
7	Damaged Tipping Floor wall panels – Rainwater observed running from outside to inside	August 2014	C	Repair damaged Tipping Floor Walls		Open
8	Deteriorated purlin west wall in Tipping Floor Enclosure	November 2014	C	Replace deteriorated purlin		Open
9	Missing glass window panes west wall in Tipping Floor Enclosure	November 2014	C	Install missing window panes	February 2015	Closed
10	Damaged curbing southwest corner of Facility near Citizen's Drop-off	November 2014	C	Repair curbing		Open
11	Damaged curbing east side of Cooling Towers	November 2014	C	Repair curbing		Open
12	Pot-hole where pavement and concrete meet entering Tipping Floor Enclosure	November 2014	C	Repair pavement		Open
13	Damaged curbing near Ash Trailer Parking Area	November 2014	C	Repair curbing		Open
14	Kick plates deteriorating on stairway west of Steam Coil Air Heaters - See Figure 1 (Appendix B)	February 2015	C	Replace stairway kick plates		Open
15	Missing handle on door at north end of Firing Aisle – See Figure 2 (Appendix B)	February 2015	C	Replace door handle		Open
16	Parapet on south end of Charging Floor damaged with exposed rebar – See Figure 3 (Appendix B)	February 2015	C	Repair concrete parapet		Open
17	Panels on west wall in Charging Floor damaged – See Figure 4 (Appendix B)	February 2015	C	Replace damaged wall panels		Open

Item No.	Audit Report Deficiencies	Issue Reported	Priority*	Resolution/Status	Date Resolved	Open / Closed
18	Gaitronics Communication Station not mounted properly outside Crane Pulpit Access Door – See Figure 5 (Appendix B)	February 2015	C	Properly mount Gaitronics Communication Station		Open
19	Missing Danger/Warning Sign (English Version) on Pit Column – See Figure 6 (Appendix B)	February 2015	C	Install proper danger/warning sign		Open

4.0 Facility Performance

Monthly operating data provided by CAAI indicates that 81,876 tons of MSW were processed during Q3FY15, and a total of 81,501 tons of MSW including 1,012 tons of Special Handling Waste were received. Total ash production during the quarter was 16,486 tons, which represents 20.1% of the waste processed. The average uncorrected steam production rate for Q3FY15 was 3.0 $\text{tons}_{\text{steam}}/\text{ton}_{\text{waste}}$, which is 1.2% less than the corresponding quarter in FY14.

Chart 1: Tons of Waste Processed

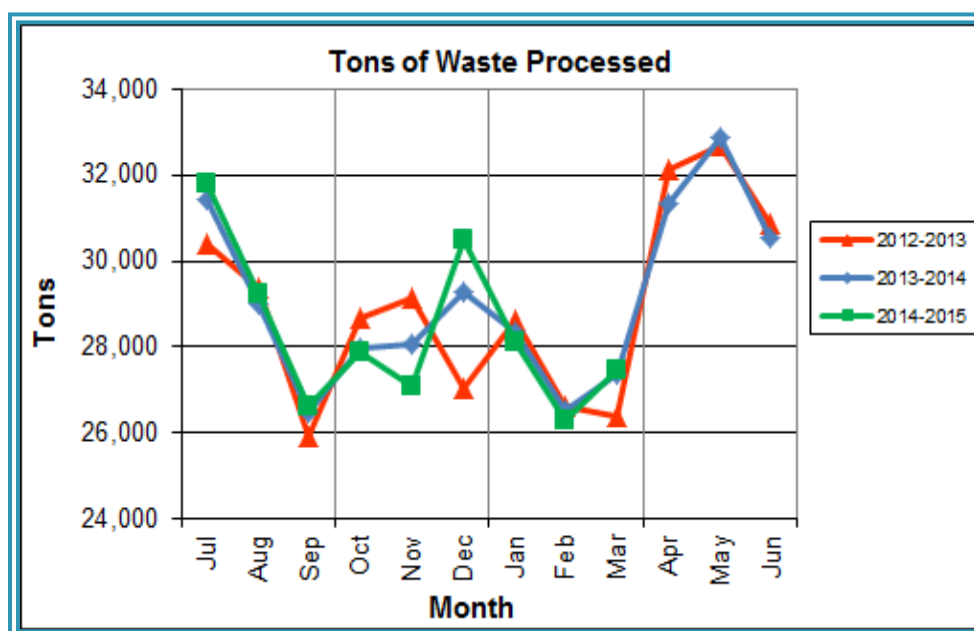


Chart 1 illustrates that Q3FY15 waste processed was slightly lower (0.4%) than the corresponding quarter, Q3FY14.

CAAI reported that 415 tipping floor/MSW internal inspections were conducted during the quarter and CAAI issued six (6) notices of violation (NOVs) to the haulers for the following issues:

- January 2015 – Five (5) NOVs were issued for:
 - Excessive metal (2)
 - Running over the curb
 - Trash on top of the truck
 - Leaving the tipping floor with the tailgate open
- February 2015 – No NOVs issued.

- March 2015 – One (1) NOV was issued for:
 - Hydraulic leak at the entrance ramp to the Tipping Floor

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

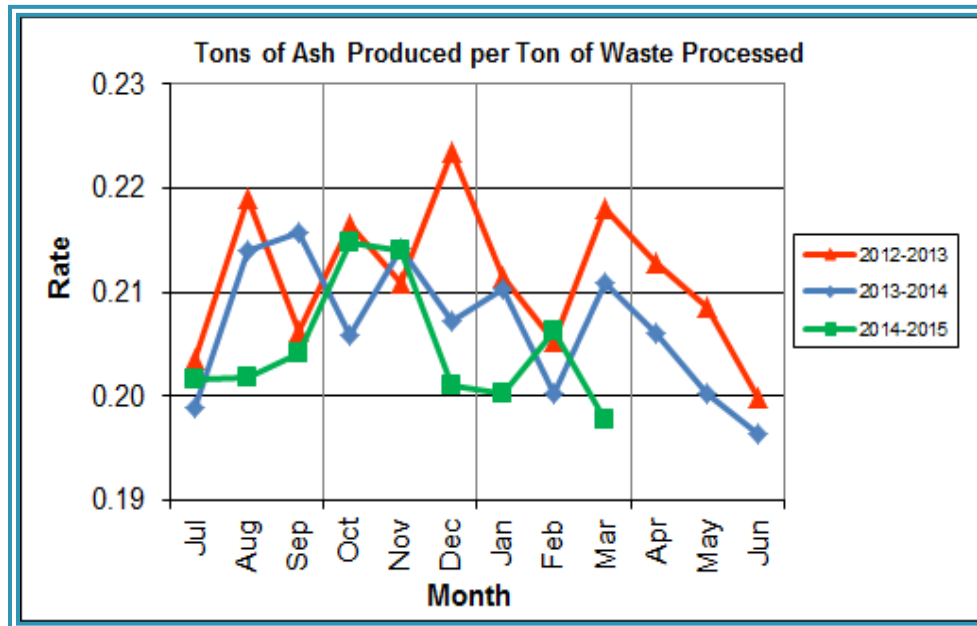


Chart 2 illustrates that ash production rates in Q3FY15 are slightly lower (0.6%) at 20.1% of processed waste, compared to the corresponding quarter in FY14 when the ash production rate was 20.7% of processed waste. Ash production remains in the 20.0% to 21.0% range, as a result of the installation of the “semi-dry” ash discharger spray system in May 2012, and represents less moisture in the ash residue shipped to disposal. Another contributing factor is increased metal recovery in the recent months following the installation of a new ferrous magnet shell during the latter part Q3FY14 (December 2013).

Chart 3: Ferrous Recovery Rate

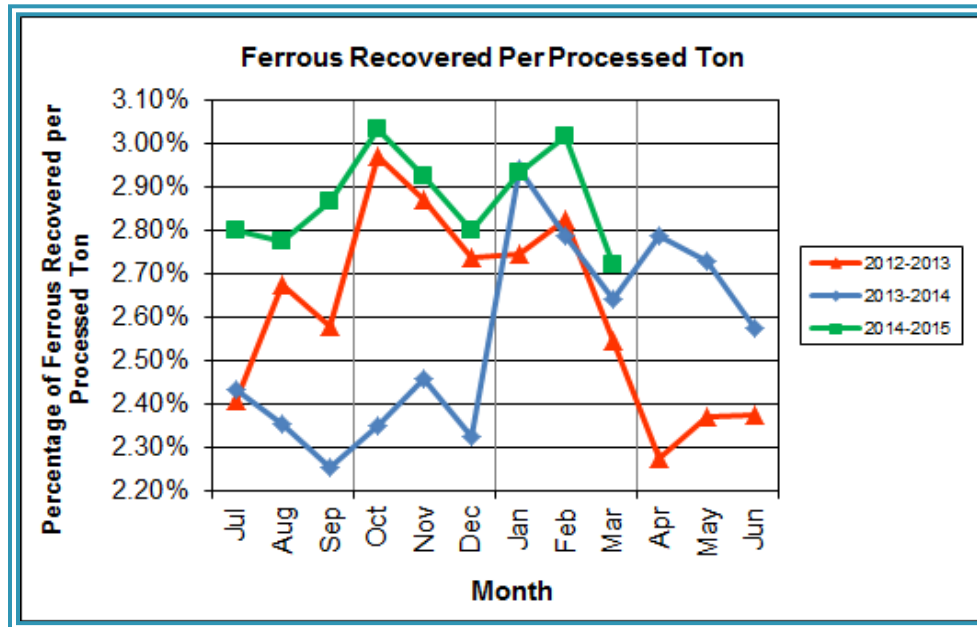
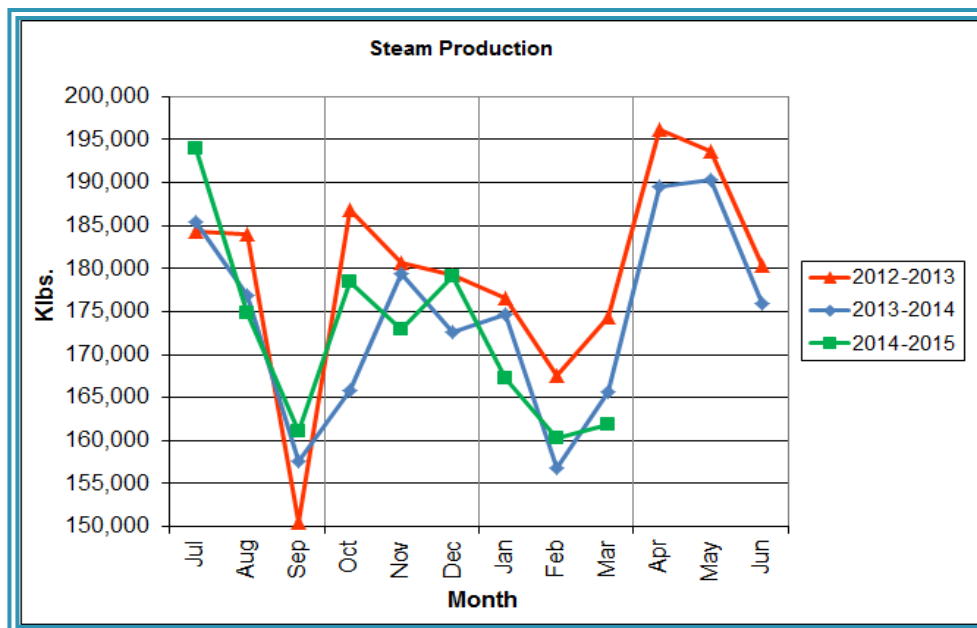


Chart 3 depicts the monthly ferrous metal recovery rate as a percentage of processed MSW tonnage. In Q3FY15, 2,366 tons of ferrous metals were recovered, which is 3.1% higher than the corresponding quarter in FY14 and equivalent to 2.9% of processed waste. The increase in ferrous metal recovery is attributable to the installation of a ferrous magnet shell, which was replaced during an outage in Q3FY14 (December 2013).

Chart 4: Steam Production



In Chart 4, the total steam production for Q3FY15 was 489,283 klbs., and 1.6% lower than the corresponding quarter in FY14. The decrease in steam production is the apparent result of throttling the boilers to remain below the steam permit monthly limits.

Chart 5: 12-Month Rolling Steam Production

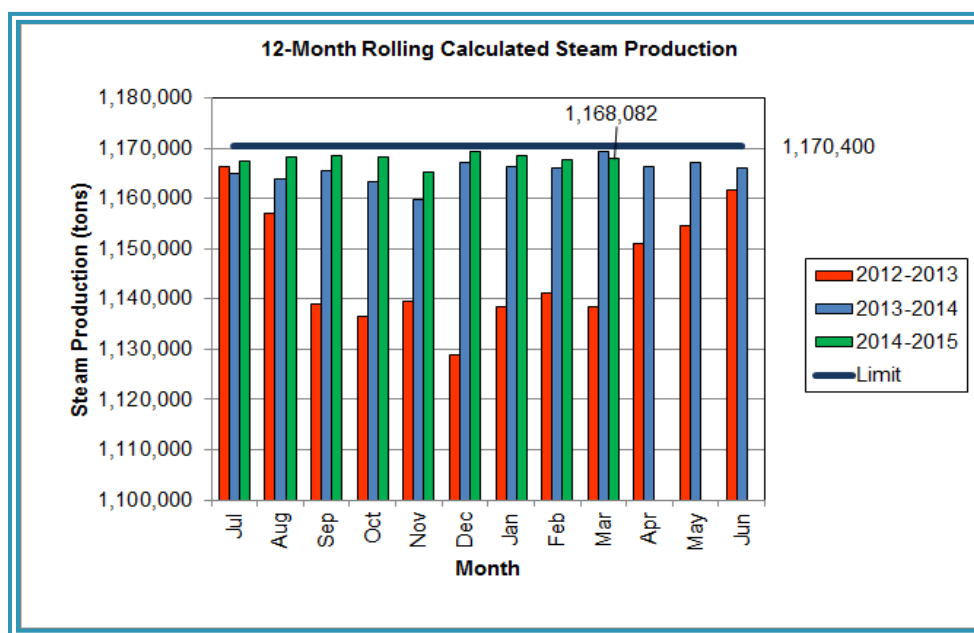
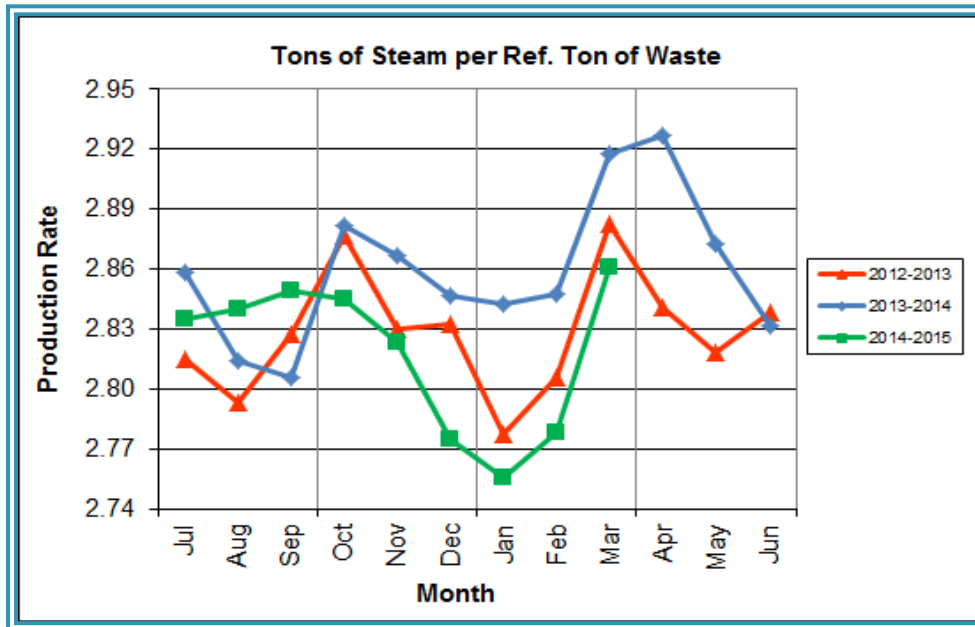


Chart 5 depicts the 12-month rolling steam production total for the period ending in March 2015. According to the Title V permit, the annual steam production for the Facility shall not exceed 1,170,400 tons on the basis of an average value of 3.34 lbs of steam per lb of MSW processed, calculated monthly as the sum of each consecutive 12 month period. The Facility was in compliance with the 12-month rolling steam production total every month in the quarter. The 12-month rolling total for steam production ending in March 2015 was 1,168,082 tons which is 99.8% of the limit. Chart 5 clearly shows that Facility throughput, and in turn, steam and electricity production are being throttled to stay ever so slightly below the steam production limit nearly every 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 Q3FY15, this metric tracked lower (2.5%) at 2.8 tons_{steam}/ton_{ref}, than the corresponding quarter in FY14. This chart shows a six-month moderate downtrend in the normalized steam production rate compared to the same period during the prior two (2) years. This trend should continue to be monitored to determine if it is indicative of poorer boiler performance, an aberration during scheduled outage periods, or some other currently unexplained cause.

Chart 7: Calculated Waste Heating Value

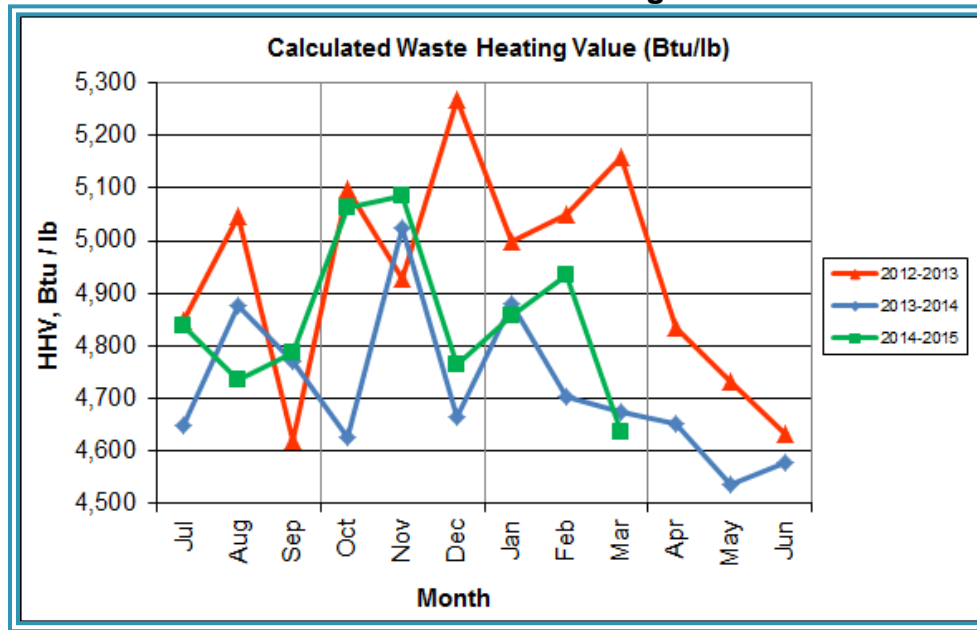


Chart 7 illustrates that Q3FY15 calculated average waste heating value was higher (1.2%) at 4,808 Btu/lb than the corresponding quarter Q3FY14, which averaged 4,752 Btu/lb. The Q3FY15 average appears to be within the typical range for winter period waste heating values.

Table 2: Quarterly Performance Summaries

Month		Waste Processed (tons)	Waste Diverted (tons)	Ash Shipped (tons)	Special Handling (Supplemental) (tons)	Ferrous Recovered (tons)	Steam Produced (klbs)	Net Electrical Generation (MWhr)
Q3FY13	Quarterly Totals	81,592	0	17,259	804	2,209	518,448	36,791
	January -13	28,610	0	6,050	363	786	176,575	12,943
	February -13	26,598	0	5,458	365	751	167,519	11,980
	March -13	26,384	0	5,751	76	672	174,354	11,868
Q3FY14	Quarterly Totals	82,214	0	17,036	699	2,296	497,215	34,952
	January -14	28,329	0	5,956	276	834	174,634	12,523
	February -14	26,537	0	5,314	192	740	156,865	11,037
	March -14	27,348	0	5,766	231	722	165,716	11,392
Q3FY15	Quarterly Totals	81,876	0	16,486	1,012	2,366	489,283	34,193
	January -15	28,114	0	5,632	389	825	167,202	11,777
	February -15	26,301	0	5,426	351	794	160,221	11,322
	March -15	27,461	0	5,428	272	747	161,860	11,094
FY15 YTD Totals		254,991	0	52,149	3,582	7,323	1,549,721	108,910
FY14 Totals		349,118	0	72,071	3,549	8,922	2,091,123	143,064
FY13 Totals		347,790	0	73,446	2,665	9,063	2,154,201	148,366

Table 2 presents the production data provided to HDR by CAAI for Q3FY15 on both a monthly and quarterly basis. For purposes of comparison, data for Q3FY13 and Q3FY14 are also shown, as well as FY13, FY14 and year to date FY15 totals.

In comparing quarterly totals, the data shows:

- Less waste was processed in Q3FY15 than Q3FY14 and more than Q3FY13
- Less steam was generated in Q3FY15 than Q3FY14 and Q3FY13
- Less electricity was generated in Q3FY15 than Q3FY14 and Q3FY13
- Significantly more supplemental waste was received in Q3FY15 than Q3FY14 and Q3FY13.

Please 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 a 12-month rolling average monthly basis, and not a fiscal year basis. It is also worth noting that the quantity of waste processed during Q3FY15 and FY15 continues to be limited by the steam production permit restrictions (refer to Chart 5).

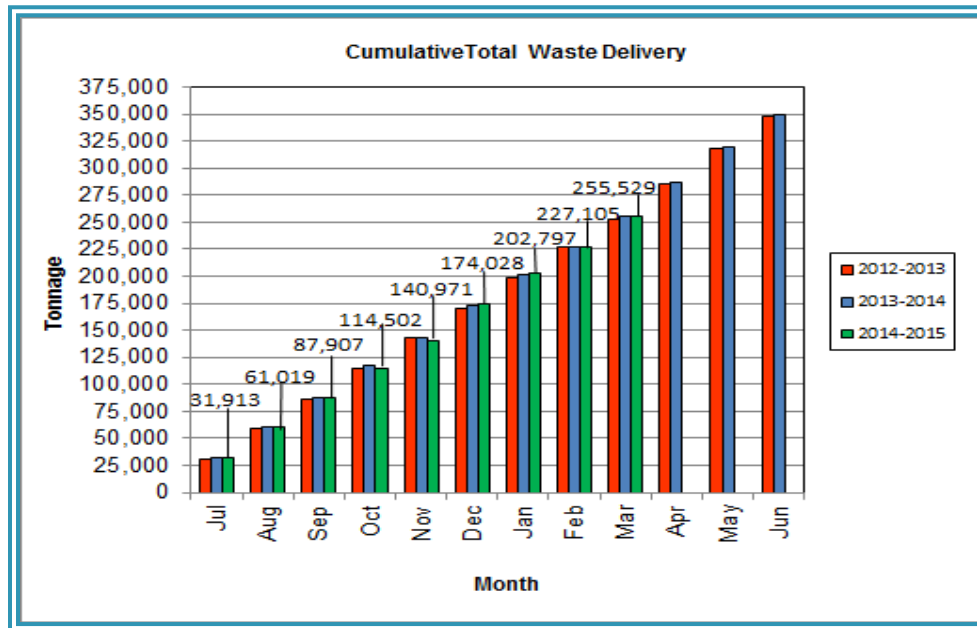
Table 3: Waste Delivery Classification

		Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Totals	% of Total
FY11	Jurisdiction Waste	18,201	19,320	18,100	18,244	17,812	17,394	16,316	15,212	18,279	18,596	20,355	19,382	217,213	62.20%
	Spot Waste tons	13,996	13,917	11,696	9,336	10,177	11,441	12,968	7,016	8,459	10,177	12,947	9,657	131,786	37.74%
	Supplemental Waste	8	17	12	13	6	13	14	34	25	29	26	6	203	0.06%
	MSW Totals	32,205	33,254	29,808	27,593	27,995	28,848	29,298	22,262	26,763	28,803	33,328	29,044	349,202	100.00%
FY12	Jurisdiction Waste	18,112	20,021	19,304	17,796	17,523	17,211	16,202	14,952	17,430	18,338	20,138	18,361	215,381	61.89%
	Spot Waste tons	8,901	13,623	13,303	9,788	11,976	11,900	10,276	10,697	10,283	10,029	11,333	10,177	132,295	38.01%
	Supplemental Waste	10	10	34	15	15	21	12	22	15	23	68	91	336	0.10%
	MSW Totals	27,023	33,654	32,641	27,599	29,514	29,132	26,490	25,672	27,729	28,390	31,539	28,629	348,012	100.00%
FY13	Jurisdiction Waste	19,413	18,357	16,632	17,625 ⁽¹⁾	18,838	16,195	-	-	-	-	-	-	107,058	30.76%
	Spot Waste tons	10,516	11,326	10,610	10,317	9,330	9,558	-	-	-	-	-	-	61,656	17.72%
	City Waste	-	-	-	-	-	-	1,683 ⁽¹⁾	1,287	1,444	2,382	2,286	1,919	11,000	3.16%
	County Waste	-	-	-	-	-	-	2,442 ⁽¹⁾	2,100	2,372	3,381	3,932	3,309	17,536	5.04%
	Municipal Solid Waste	-	-	-	-	-	-	25,019 ⁽¹⁾	23,637	21,661	27,066	25,794	24,930	148,107	42.56%
	Supplemental Waste	151	11	80	25	234	405	363	365	76	403	281	271	2,665	0.77%
	MSW Totals	29,928	29,683	27,241	27,942	28,167	25,753	29,507	27,388	25,552	33,231	32,293	30,429	348,022	100.00%
FY14	City Waste	2,065	1,693	1,702	1,924	1,566	1,780	1,529	1,231	1,556	2,256	2,203	1,883	21,389	6.11%
	County Waste	3,459	3,079	2,784	3,091	2,707	2,802	2,568	1,957	2,272	3,326	3,987	3,387	35,419	10.12%
	Municipal Solid Waste	26,167	23,604	22,034	23,354	21,879	25,531	23,869	22,523	23,198	25,414	27,206	24,812	289,590	82.75%
	Supplemental Waste	546	676	248	410	188	268	275	192	231	253	151	110	3,548	1.01%
	MSW Totals	32,237	29,053	26,768	28,779	26,340	30,380	28,241	25,903	27,256	31,249	33,546	30,193	349,946	100.00%
FY15	City Waste	1,814	1,497	1,699	1,737	1,518	1,770	1,411	1,209	1,648				14,303 ⁽⁸⁾	5.60%
	County Waste	3,297	2,868	2,973	3,095	2,508	2,852	2,358	1,833	2,411				24,194 ⁽²⁾	9.47%
	Municipal Solid Waste	26,661	24,466	21,887	21,241	21,678	27,906	24,611	20,915	24,094				213,459 ⁽²⁾	83.54%
	Supplemental Waste	141	275	329	521	764	529	389	351	272				3,571 ⁽²⁾	1.40%
	MSW Totals	31,913	29,106	26,888	26,595	26,468	33,057	28,769	24,308	28,424				255,528 ⁽²⁾	100.00%

Note (1): Beginning January 2013, the method in which waste was classified was modified as compared to prior periods due to change in contractual obligations and plant ownership

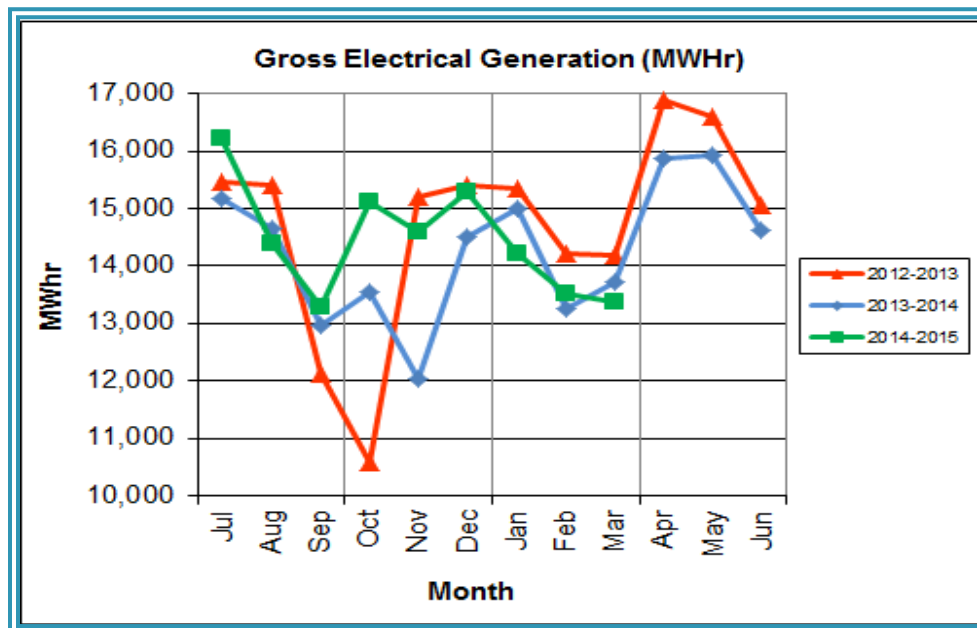
Note (2): Totals are Year to Date (YTD) Values

Chart 8: Cumulative Total Waste Delivery



As depicted in Table 3 and Chart 8, for the period ending in March 2015; cumulative total waste delivery was 0.2% more compared to the same period in FY14.

Chart 9: Gross Electrical Generation

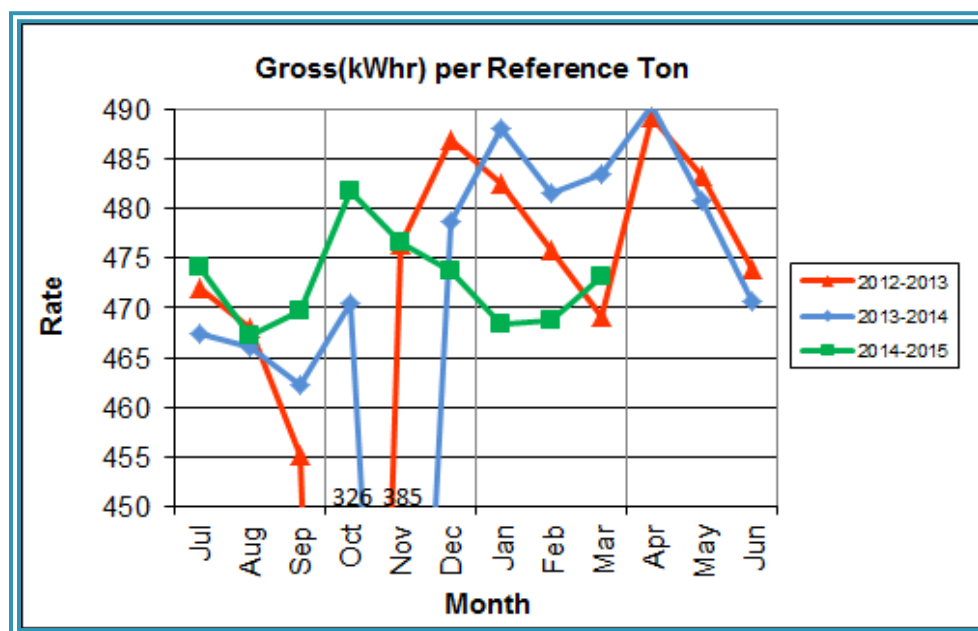


During Q3FY15, the Facility generated 41,107 MWhrs (gross) of electricity compared to Q3FY14 generation of 41,990 MWhrs (gross), a 2.1% decrease.

The decrease in gross electrical production is attributable to the decrease in steam production.

Note that the 3-year low of gross electrical production experienced in October 2012 was due to Turbine Generator No. 1 experiencing 494.5 hours of downtime for scheduled maintenance and again in November 2013 when Turbine Generator No. 2 had a major overhaul and experienced 494.8 hours of downtime. Evidence of the downtime experienced by the Turbine Generators is also apparent in Chart Nos. 10 through 14, including sharp spikes in the trends for the months of October 2012 and November 2013 when the Overhauls were conducted on Turbine Generator Nos. 1 and 2, respectively.

Chart 10: Gross Conversion Rate



As shown in Chart 10, the average gross electrical generation per reference ton of refuse processed during Q3FY15 was 470 kWhr, which is 3.0% lower than the corresponding quarter in FY14. Since this calculated value uses reference or normalized tonnages of waste, it should cancel the effect of MSW heating value (Btu content) variability.

Chart 11: Net Conversion Rate

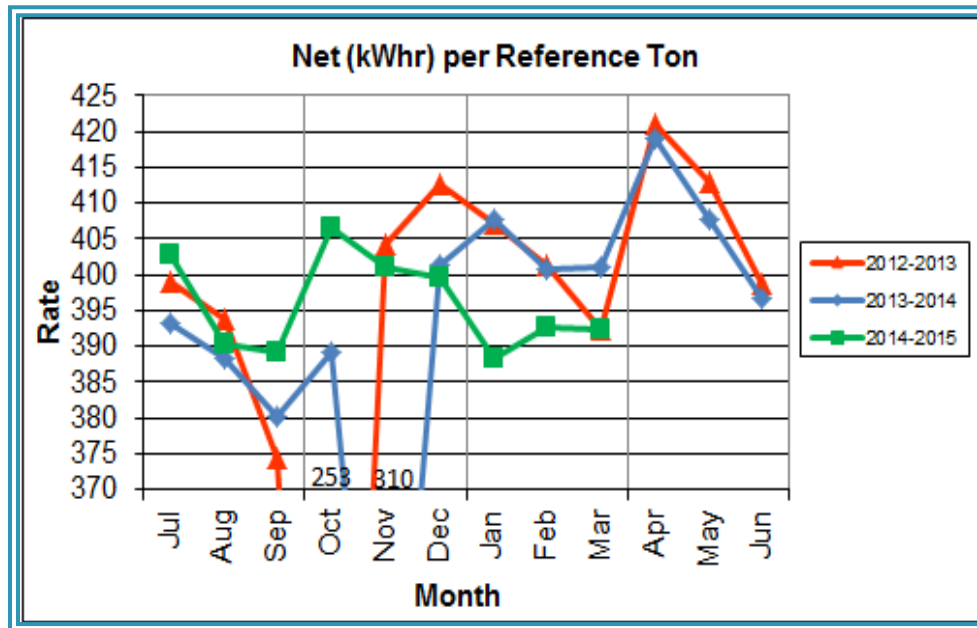


Chart 11 depicts the normalized net power (gross minus in-house usage) generation history. In Q3FY15, the average net electrical generation per reference ton was 391 kWhr, which is 3.0% lower than the corresponding quarter in FY14.

Chart 12: Net Conversion Rate

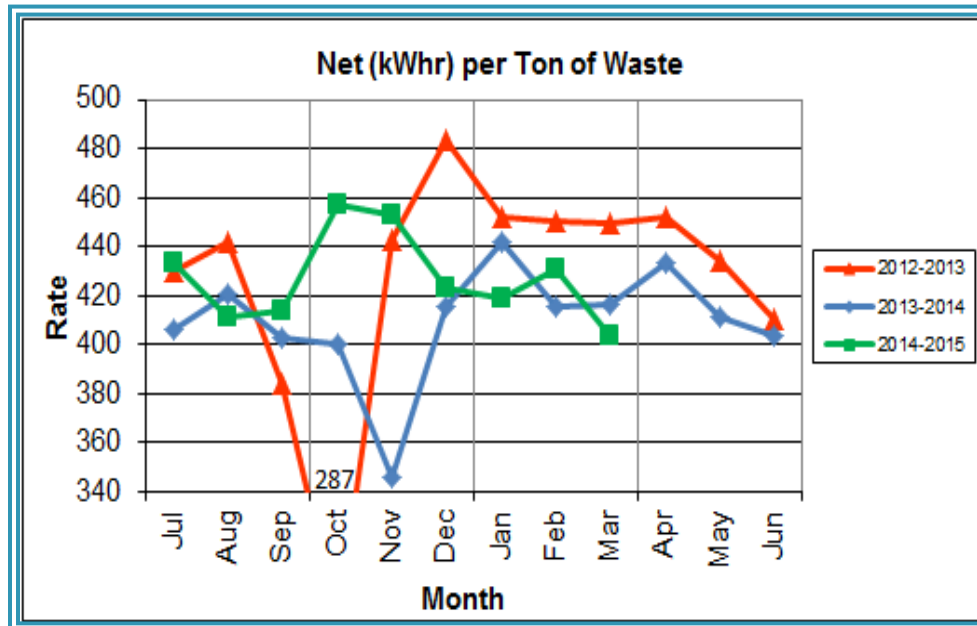
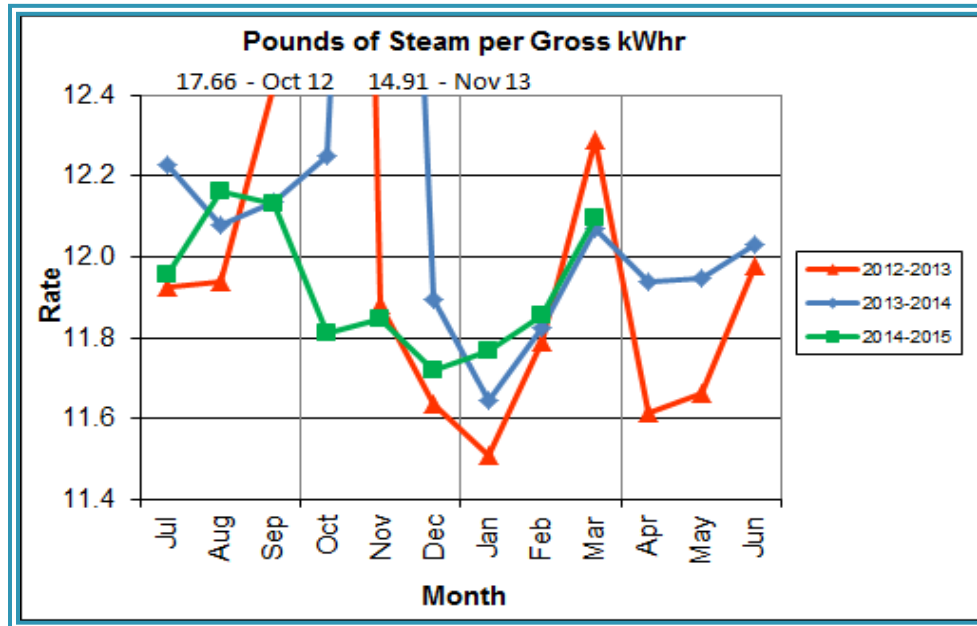


Chart 12 depicts the net power generation per processed ton. The net electrical generation per processed ton in Q3FY15 was 418 kWhr, which is 1.7% lower than the corresponding quarter in FY14.

Chart 13: Gross Turbine Generator Conversion Rate

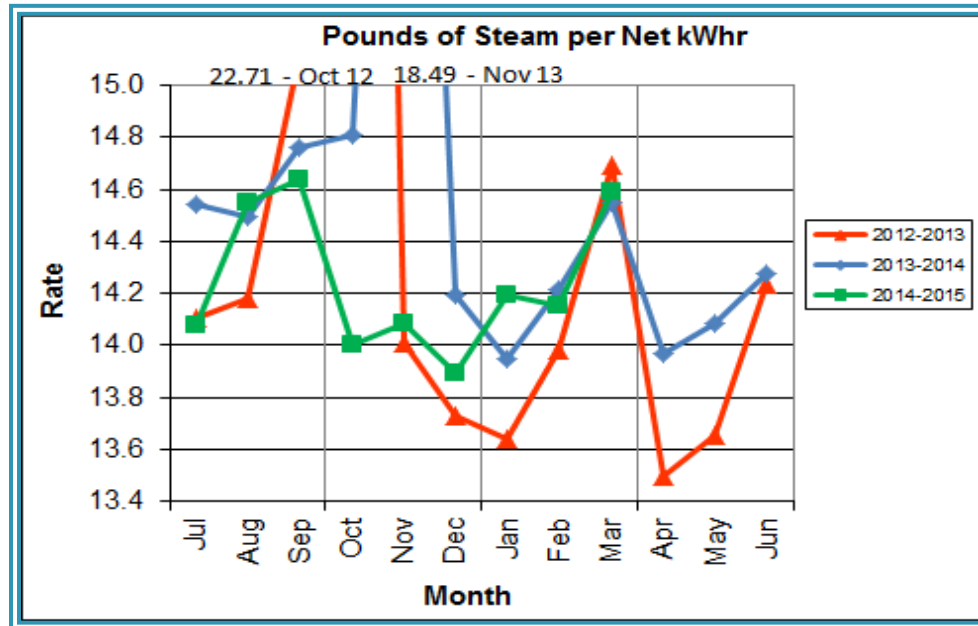


Charts 13 and 14 illustrate the quantities of steam required to generate one kWhr of electricity, gross and net respectively. This measure is a turbine generator performance indicator, where lower steam rates indicate superior performance. For simplification, this calculated rate is based on the average for the two turbine generators. In Q3FY15 the average lbs of steam consumed per gross kWhr was 11.9, which is higher (0.5%) than the corresponding quarter Q3FY14, and indicative of slightly poorer performance of the Turbine Generators. The average lbs of steam consumed per net kWhr was 14.3, which is higher (0.6%) than the corresponding quarter in FY14. The average steam temperature during the quarter was 676.9° F, which is 0.1% higher than the average steam temperature of the corresponding quarter last year and 23.1° F lower than design temperature of 700° F.

CAAI reported that during the Turbine Generator No. 2 overhaul in November 2013, some cracking was observed on the Stage 9 blades of the rotor, and the blading in that row was removed as a precautionary measure. CAAI indicated

that a new set of blades will be manufactured and installed during a Turbine Generator No. 2 Outage in 2016 (Note: In May 2015, CAAI advised that the implementation of the replacement blades installation has been delayed).

Chart 14: Net Turbine Generator Conversion Rate



4.1 Utility and Reagent Consumptions

Table 4: Facility Utility and Reagent Consumptions

Utility	Units	Q3FY15 Total	Q3FY14 Total	Q3FY15"Per Processed Ton" Consumption	Q3FY14"Per Processed Ton" Consumption	FY15 YTD Total	FY14 Total
Purchased Power	MW hr	5,475	6,033	0.07	0.07	16,524	22,724
Fuel Oil	Gal.	12,990	11,870	0.16	0.14	30,280	54,350
Boiler Make-up	Gal.	1,908,000	2,048,000	23.30	24.91	6,411,000	8,629,000
Cooling Tower Make-up	Gal.	24,834,867	23,898,220	303.32	290.68	98,998,675	131,237,906
Pebble Lime	Lbs.	1,302,000	1,288,000	15.90	15.67	3,868,000	5,090,000
Ammonia	Lbs.	142,000	152,000	1.73	1.85	473,000	648,000
Carbon	Lbs.	100,000	96,000	1.22	1.17	306,000	406,000
Dolomitic Lime	Lbs.	218,000	298,000	2.66	3.62	690,000	1,084,000

Fuel oil usage during the quarter represents approximately 0.24% of the total heat input to the boilers, which compares favorably with industry averages, and slightly higher than the percentage of heat input in Q3FY14 which was 0.22%. Fuel oil is used to stabilize combustion of wet fuel, as well as during start-up and shut-down of the boilers for maintenance. Boiler makeup water usage during the quarter represents 3.3% of steam flow, and is acceptable. Pebble lime usage, at 1,302,000 lbs. is higher (1.1%) than the corresponding quarter last year, and the quarterly consumption rate of 15.9 lbs/ton is close to historical levels (16-18 lbs/ton).

In comparing Q3FY15 to Q3FY14 on a per processed ton consumption basis:

- the purchased power consumption rate was 8.9% lower
- the total fuel oil consumption rate was 9.9% higher
- the boiler make-up water consumption rate was 6.5% lower
- the cooling tower make-up water consumption rate was 4.4% higher
- the total pebble lime consumption rate was 1.5% higher
- the ammonia consumption rate was 6.2% lower
- the carbon consumption rate was 4.6% higher
- the total dolomitic lime consumption rate was 26.5% lower

4.2 Safety & Environmental Training

The Facility had no recordable accidents during the quarter and has operated 1,594 days without an OSHA recordable incident through the end of March 2015. Safety and Environmental training was conducted during the quarter with themes as follows:

January 2015

- Safety:
 - Confined Spaces
 - Three (3) Points of Contact
 - Cam Lock and Chicago Fittings
- Environmental:

- Clean World Initiative
- Sustainability and new/upcoming Municipal Waste Combustor (MWC) Regulations

February 2015

- Safety:
 - Respiratory Protection and Heavy Metals
 - Rigging
 - Cold Weather Preparation
 - 2014 Stats & 2015 Goals
- Environmental:
 - Recognizing, Reporting, and Responding to Environmental Concerns
 - ECOM Section 1

March 2015

- Safety:
 - Ladder Safety
 - Flagging and Barricades
 - Heat Stress
- Environmental:
 - Stack Testing
 - CEMS Communication
 - Environmental Compliance

5.0 Facility Maintenance

Throughout the quarter, significant 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. CAAI monthly maintenance reports provide a detailed account of maintenance performed.

Beginning January 24, 2015, Boiler No. 3 experienced 137.8 hours of downtime for scheduled maintenance. Some significant maintenance activities conducted during the outage include:

- Replacement of all the feed table bars
- Replacement of both feed ram sleds with all new bars, sled shoes, support rollers, and guide rollers along with the side wall wear plates, and triangular brake plates
- Replacement of three (3) curved blocks
- Replacement of the tail shaft, bearings, and seals on the Scrubber Fly Ash Screw Convey
- Replacement of the soot blower elements for G9B Sootblower Nos. 5 and 13
- Replacement of both ash discharger hydraulic cylinders and hoses
- Replacement of the Over Fire Air Fan Motor
- Replacement of the Auxiliary Burner Fan Motor

Beginning February 28, 2015, Boiler No. 2 experienced 139.0 hours of downtime for scheduled maintenance. Some significant maintenance activities conducted during the outage include:

- Replacement of the Auxiliary Burner Fan Motor
- Replacement of all the triangular brake plates
- Replacement of the Run 2 Side Feed Ram Hydraulic Cylinder and Tube Protector
- Change-out of four (4) soot blower elements on G9B Sootblower Nos. 2, 3, 6, and 14
- Replacement of three (3) broken grate bars
- Replacement of two (2) feed ram bars and one (1) slide block
- Replacement of one (1) feed chute curve block
- Replacement of one (1) ash discharger transverse wall liner plate
- Replacement of both feed chute damper hydraulic cylinders

Beginning March 7, 2015, Boiler No. 1 experienced 140.0 hours of downtime for scheduled maintenance. Some significant maintenance activities conducted during the outage include:

- Replacement of all the feed table bars
- Replacement of both feed ram sleds with all new bars, slide shoes, support rollers, and guide rollers along with the side wall wear plates, and triangular brake plates
- Replacement of all the feed ram scrapers
- Replacement of both feed ram hydraulic cylinders and also the tube protectors
- Replacement of the Run 1 Side Ash Discharger Hydraulic Cylinder
- Replacement of the south side steam drum safety
- Repair of the feed chute hopper inclined face
- Change-out of four (4) soot blower elements on G9B Sootblower Nos. 2, 3, 4, and 6
- Replacement of all the baffle plates, supports, and angles on the fourth floor inlet side to the generating bank
- Repair of all the holes that were found on the bag house screw conveyor troughs, and associated duct work

In addition to maintenance activities conducted during scheduled outages, CAAI reports that 953 preventative maintenance actions were completed during the quarter.

5.1 Availability

Facility availabilities for Q3FY15 are shown in Table 5. According to CAAI reports, the average unit availabilities for Boiler Nos. 1, 2, and 3 for Q3FY15 were 92.4%, 93.1%, and 93.8%, respectively. The three-boiler average availability during the quarter was 93.1%, which is good.

During Q3FY15, the average availability for Turbine Generator Nos. 1 and 2 was 100.0%, which is excellent. Note that the reported unit availability percentages exclude standby time.

Table 5: Quarterly Facility Unit Availabilities

Availability	Q1FY15 Average	Q2FY15 Average	Q3FY15 Average	FY15 YTD Average
Boiler No. 1	93.8%	100.0%	92.4%	95.4%
Boiler No. 2	100.0%	93.6%	93.1%	95.6%
Boiler No. 3	96.2%	93.9%	93.8%	94.6%
Avg.	96.7%	95.8%	93.1%	95.2%
Turbine No. 1	100.0%	95.0%	100.0%	98.3%
Turbine No. 2	100.0%	99.6%	100.0%	99.9%
Avg.	100.0%	97.3%	100.0%	99.1%

5.2 Downtime Summary

During the quarter, the Facility experienced three (3) instances of unscheduled downtime for the boilers totaling 44.5 hours, and no unscheduled downtime for the turbine generators. Beginning January 24, 2015, Boiler No. 3 experienced 137.8 hours of downtime for scheduled maintenance. Beginning February 28, 2015, Boiler No. 2 experienced 139.0 hours of downtime for scheduled maintenance. Beginning March 7, 2015, Boiler No. 1 experienced 140.0 hours of downtime for scheduled maintenance. The boilers experienced four (4) instances of standby time totaling 107.0 hours, and the turbine generators experienced two (2) instances of standby time totaling 132.1 hours during the quarter. All of the boiler standby time was reported to be a preventative measure to avoid exceeding the steam permit limit on a monthly basis. Details of downtime events experienced during the quarter are portrayed in Tables 6 and 7:

Table 6: Boiler Downtime – Q3FY15

Boiler Number	Outage Begin Date	Outage End Date	Hours Unavailable	Downtime Classification	Reason Unavailable
3	1/1/15	1/2/15	40.5	Standby	Preventative measure taken to avoid exceeding 350,000 ton rolling 12-month process limit
3	1/24/15	1/30/15	137.8	Scheduled	Spring 2015 Scheduled Maintenance
3	1/30/15	1/31/15	33.5	Standby	Preventative measure taken to avoid exceeding 350,000 ton rolling 12-month process limit
2	2/27/15	2/28/15	24.0	Standby	Preventative measure taken to avoid exceeding 350,000 ton rolling 12-month process limit
2	2/28/15	3/6/15	139.0	Scheduled	Spring 2015 Scheduled Maintenance
1	3/7/15	3/13/15	140.0	Scheduled	Spring 2015 Scheduled Maintenance
2	3/8/15	3/8/15	14.0	Unscheduled	Under Fire Air Fan Motor Replacement
3	3/8/15	3/8/15	1.0	Unscheduled	Stoker Programmable Logic Controller Malfunction
1	3/13/15	3/13/15	9.0	Standby	Preventative measure taken to avoid exceeding 350,000 ton rolling 12-month process limit
1	3/14/15	3/16/15	29.5	Unscheduled	Waterwall Failure – External Tube Leak
Total Unscheduled Downtime			44.5 Hours		
Total Scheduled Downtime			416.8 Hours		
Total Standby Downtime			107.0 Hours		
Total Downtime			568.3 Hours		

Table 7: Turbine Generator Downtime – Q3FY15

Turbine Generator Number	Outage Begin Date	Outage End Date	Hours Unavailable	Downtime Classification	Reason Unavailable
2	1/1/15	1/1/15	24.0	Standby	Boiler No. 3 in Standby for Process Limitations
2	3/8/15	3/12/15	108.1	Standby	All three (3) Boilers Down and Lack of Steam
Total Unscheduled Downtime			0.0 Hours		
Total Scheduled Downtime			0.0 Hours		
Total Standby Downtime			132.1 Hours		
Total Downtime			132.1 Hours		

5.3 Facility Housekeeping

CAAI is performing Facility housekeeping and maintaining plant cleanliness in accordance with acceptable industry practices. A site inspection was conducted in February 2015. At the time of the inspection, new deficiencies were recorded and prior deficiencies were given a status update. Photos of interest from the inspection are depicted in Appendix B. The Facility housekeeping ratings from the February 2015 inspection are presented in Table 8.

Table 8: Facility Housekeeping Ratings – February 2015

Facility Area	Highly Acceptable	Acceptable	Needs Improvement	Unacceptable
Tipping Floor			√ ⁽¹⁾	
Citizen's Drop-off Area			√ ⁽²⁾	
Tipping Floor Truck Exit		√		
Front Parking Lot		√		
Rear Parking Lot		√		
Boiler House Pump Room		√		
Lime Slurry Pump Room		√		
Switchgear Area		√		
Ash Load-out Area		√		
Vibrating Conveyor Area	√			
Ash Discharger Area		√		
Cooling Tower Area		√		
Truck Scale Area		√		
SDA/FF Conveyor Area		√		
SDA Penthouses		√		
Lime Preparation Area		√		
Boiler Drum Levels		√		
Turbine Room			√ ⁽³⁾	
Electrical Room		√		

Note (1): Tipping Floor – Needs Improvement

- Wall panels damaged
- Deteriorated Purlin

Note (2): Citizen's Drop-off Area – Needs Improvement

- Damaged Curbing

Note (3): Turbine Room – Needs Improvement

- Ceiling panels corroded

6.0 Environmental

The retrofit 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 Q3FY15 are summarized in Appendix A. The Facility experienced no environmental exceedances during the quarter.

On August 8, 2014, CAAI requested via letter to the Virginia Department of Environmental Quality (VADEQ) relief from the steam permit limit requirements in the Facility's Title V and PSD permits. These requested changes relate to the permit values established for the steam to waste ratio, the result of which is a reduction in MSW throughput than would be the case with different value(s) for this established ratio. In recent discussions, CAAI indicated that it is re-evaluating options to the proposed permit changes, and will provide further updates on this issue.

6.1 Nitrogen Oxide Emissions

During Q3FY15, the monthly emission concentrations of nitrogen oxides (NO_x) averaged 168.3 ppmdv, 162.7 ppmdv and 162.7 ppmdv for Boiler Nos. 1, 2, and 3, respectively. CAAI continues to operate the units at the lower (160 ppmdv) set-points, except immediately following a scheduled outage and associated boiler cleaning.

6.2 Sulfur Dioxide Emissions

During Q3FY15 the monthly emission concentration of stack sulfur dioxide (SO₂) averaged 1.7 ppmdv, 1.7 ppmdv, and 1.0 ppmdv for Boiler Nos. 1, 2, and 3, respectively. All of these stack SO₂ concentrations are significantly below the 40 CFR Subpart Cb requirement of 29 ppmdv @ 7% O₂.

6.3 Carbon Monoxide Emissions

During Q3FY15, the average CO emission concentrations on Boiler Nos. 1, 2, and 3 were 34.3 ppm_{dv}, 38.3 ppm_{dv}, and 27.3 ppm_{dv}, respectively, and all are well within permit limits (100 ppm_{dv}, hourly average).

6.4 Opacity

During Q3FY15, the average opacity for Boiler Nos. 1, 2, and 3 was 0.3%, 1.0%, and 0.5% respectively. All of these averages are significantly below the 10% (6-minute) average permit limit.

6.5 Daily Emissions Data

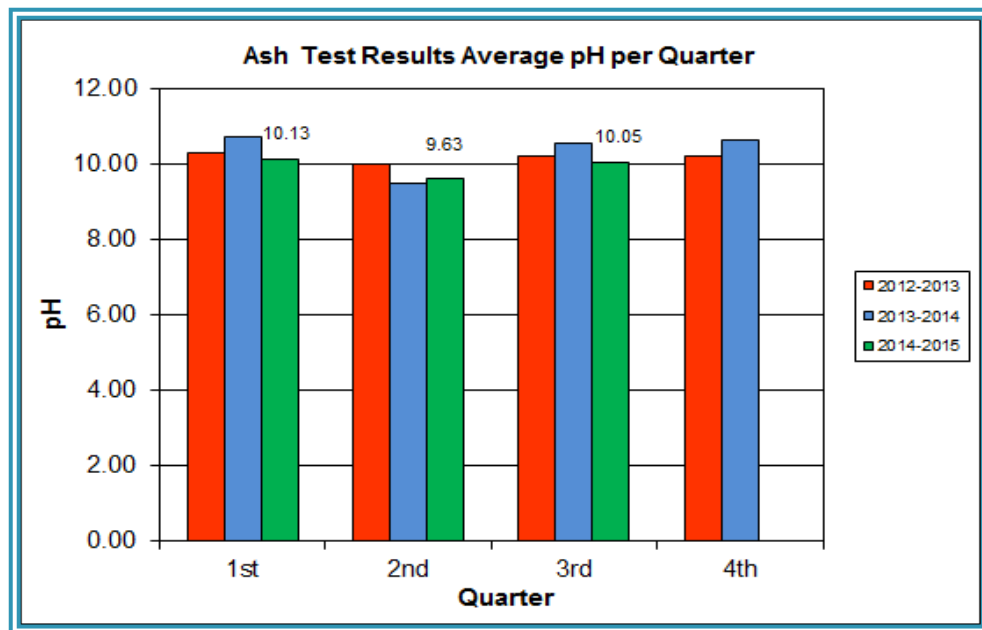
Appendix A, Tables 9, 10, and 11 tabulate the monthly average, maximum, and minimum emissions data for each unit during Q3FY15. Excursions, if any, would appear in bold print. It should be noted that these tabulations of monthly averages, reported here for informational purposes, are based on tabulations of daily averages. These averages do not correlate with official reports to the regulatory agencies because of differences in averaging times and other technical differences required by agency report formats.

6.6 Ash System Compliance

The dolomitic lime feed rate is adjusted periodically in order to maintain a desired ash pH level in the range of 8.0 to 11.0. Since initial startup, the feed rate has varied from between 1 to 9 lbs per ton each month. Ash Toxicity (TCLP) tests were not performed during Q3FY15.

CAAI also samples ash monthly in-house, and documents pH reading to adjust dolomitic lime feed rate. The results for the ash pH tests are found below in Chart 15 where each quarter is represented by the average of the respective monthly readings. During Q3FY15, the average ash pH for in-house tests was 10.1.

Chart 15: Quarterly Ash Test Results



APPENDIX A FACILITY CEMS DATA

Table 9: Unit #1 Monthly Summary for Reportable Emissions Data

Group#-Channel#		G8-C35	G8-C28	G8-C8	G8-C4	G8-C12	G8-C34	G8-C37	G8-C40	G8-C39
Long Descrip.		U-1 Steam	U-1 Econ	U-1 Stack	U-1 Stack	U-1 Stack	U-1 Opaci	U-1 FF In	U-1 Carbo	U-1 Lime
Short Descrip.		SteamFI	SO ₂ ec	SO ₂ sc	COsc	NO _x sc	Opacity	FF InTemp	CarbInj	LimeFlow
Units		K#/Hr	ppmc	ppm	ppmc	ppmc	%	deg F	#/hr	gpm
Range		0-100	0-2000	0-500	0-4000	0-1000	0-100	100-500	0-50	0-20
Jan-15	AVG	80.1	19.0	1.0	34.0	166.0	0.6	302.0	16.3	2.9
	Max	85.1	49.0	5.0	45.0	173.0	1.3	305.0	17.3	3.4
	Min	72.3	8.0	0.0	25.0	164.0	0.0	302.0	16.1	2.6
Feb-15	AVG	74.7	14.0	1.0	36.0	167.0	0.3	303.0	16.2	3.1
	Max	81.9	22.0	4.0	51.0	186.0	1.9	303.0	16.5	3.6
	Min	69.1	7.0	0.0	23.0	163.0	0.0	302.0	16.1	2.9
Mar-15	AVG	81.6	58.0	3.0	33.0	172.0	0.0	303.0	16.4	3.3
	Max	85.9	93.0	9.0	56.0	185.0	0.2	306.0	18.2	3.8
	Min	73.6	10.0	0.0	16.0	163.0	0.0	298.0	16.1	2.9
Quarter Average		78.8	30.3	1.7	34.3	168.3	0.3	302.7	16.3	3.1
Quarter Max Value		85.9	93.0	9.0	56.0	186.0	1.9	306.0	18.2	3.8
Quarter Min Value		69.1	7.0	0.0	16.0	163.0	0.0	298.0	16.1	2.6
Limits:		98	NA	29	100	205	10	333	16(a)	

(a) Carbon flow limit is a minimum value

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

Table 10: Unit #2 Monthly Summary for Reportable Emissions Data

Group#-Channel#		G8-C35	G8-C28	G8-C8	G8-C4	G8-C12	G8-C34	G8-C37	G8-C40	G8-C39
Long Descrip.		U-2 Steam	U-2 Econ	U-2 Stack	U-2 Stack	U-2 Stack	U-2 Opaci	U-2 FF In	U-2 Carbo	U-2 Lime
Short Descrip.		SteamFl	SO ₂ ec	SO ₂ sc	COsc	NO _x sc	Opacity	FF InTemp	CarbInj	LimeFlow
Units		K#/Hr	ppmc	ppm	ppmc	ppmc	%	deg F	#/hr	gpm
Range		0-100	0-2000	0-500	0-4000	0-1000	0-100	100-500	0-50	0-20
Jan-15	AVG	86.1	25.0	1.0	40.0	159.0	1.1	297.0	16.3	2.8
	Max	92.2	66.0	5.0	58.0	165.0	1.9	301.0	16.8	3.1
	Min	77.0	11.0	0.0	28.0	155.0	0.1	296.0	16.1	2.3
Feb-15	AVG	85.5	19.0	2.0	40.0	160.0	1.5	296.0	16.3	3.1
	Max	90.5	34.0	5.0	56.0	178.0	3.1	297.0	17.7	3.4
	Min	77.3	11.0	0.0	25.0	158.0	0.0	296.0	16.0	2.8
Mar-15	AVG	89.1	68.0	2.0	35.0	169.0	0.3	297.0	16.3	3.2
	Max	93.4	95.0	6.0	64.0	178.0	1.2	297.0	17.5	3.6
	Min	83.6	41.0	0.0	16.0	152.0	0.0	295.0	15.1	2.9
Quarter Average		86.9	37.3	1.7	38.3	162.7	1.0	296.7	16.3	3.0
Quarter Max Value		93.4	95.0	6.0	64.0	178.0	3.1	301.0	17.7	3.6
Quarter Min Value		77.0	11.0	0.0	16.0	152.0	0.0	295.0	15.1	2.3
Limits:		96	NA	29	100	205	10	330	16(a)	

(a) Carbon flow limit is a minimum value

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

Table 11: Unit #3 Monthly Summary for Reportable Emissions Data

Group#-Channel#		G8-C35	G8-C28	G8-C8	G8-C4	G8-C12	G8-C34	G8-C37	G8-C40	G8-C39
Long Descrip.		U-3 Steam	U-3 Econ	U-3 Stack	U-3 Stack	U-3 Stack	U-3 Opaci	U-3 FF In	U-3 Carbo	U-3 Lime
Short Descrip.		SteamFl	SO ₂ ec	SO ₂ sc	COsc	NO _x sc	Opacity	FF InTemp	CarbInj	LimeFlow
Units		K#/Hr	ppmc	ppm	ppmc	ppmc	%	deg F	#/hr	gpm
Range		0-100	0-2000	0-500	0-4000	0-1000	0-100	100-500	0-50	0-20
Jan-15	AVG	86.1	25.0	0.0	24.0	160.0	0.7	302.0	16.2	3.0
	Max	90.6	33.0	2.0	34.0	166.0	1.4	307.0	17.0	3.2
	Min	74.0	13.0	0.0	11.0	153.0	0.4	300.0	16.1	2.8
Feb-15	AVG	85.2	55.0	2.0	30.0	169.0	0.7	302.0	16.3	3.1
	Max	90.9	93.0	6.0	44.0	181.0	1.1	305.0	17.1	3.6
	Min	75.6	27.0	0.0	20.0	156.0	0.0	301.0	16.1	2.9
Mar-15	AVG	87.0	47.0	1.0	28.0	159.0	0.1	303.0	16.3	3.3
	Max	91.1	89.0	5.0	38.0	162.0	1.7	308.0	18.0	3.9
	Min	79.4	32.0	0.0	18.0	154.0	0.0	299.0	16.1	2.9
Quarter Average		86.1	42.3	1.0	27.3	162.7	0.5	302.3	16.3	3.1
Quarter Max Value		91.1	93.0	6.0	44.0	181.0	1.7	308.0	18.0	3.9
Quarter Min Value		74.0	13.0	0.0	11.0	153.0	0.0	299.0	16.1	2.8
Limits:		98	NA	29	100	205	10	327	16(a)	

(a) Carbon flow limit is a minimum value

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

APPENDIX B

SITE PHOTOS – FEBRUARY 2015



Figure 1: Kick plates deteriorating on stairway west of Steam Coil Air Heaters (New Deficiency)



Figure 2: Missing handle on door at north end of Firing Aisle (New Deficiency)



Figure 3: Parapet on south end of Charging Floor damaged with exposed rebar (New Deficiency)



Figure 4: Panels on west wall in Charging Floor damaged (New Deficiency)



Figure 5: Gaitronics Communication Station not mounted properly outside Crane Pulpit Access Door (New Deficiency)



Figure 6: Missing Danger/Warning Sign (English Version) on Pit Column (New Deficiency)



Figure 7: New Paved Area at Scale Access – Satisfies Deficiencies from 2010 and 2012



Figure 8: Citizen's Drop-Off Roll-Off



Figure 9: New Fire Station – Photo from just east of Scale House



Figure 10: White Goods (Metal) Drop-Off Roll-Off



Figure 11: Ash Trailer Canopy – No Issues Observed



Figure 12: Cooling Tower and Air Pollution Control Area – Photo from Southeast Corner of Facility



Figure 13: New Crane Grapple Tine



Figure 14: Main Vibrating Ash Conveyor- No Issues Observed



Figure 15: Firing Aisle – Photo from north looking south



Figure 16: Ferrous Drum Magnet – No Issues Observed



Figure 17: Turbine Generator No. 2 – No Issues Observed

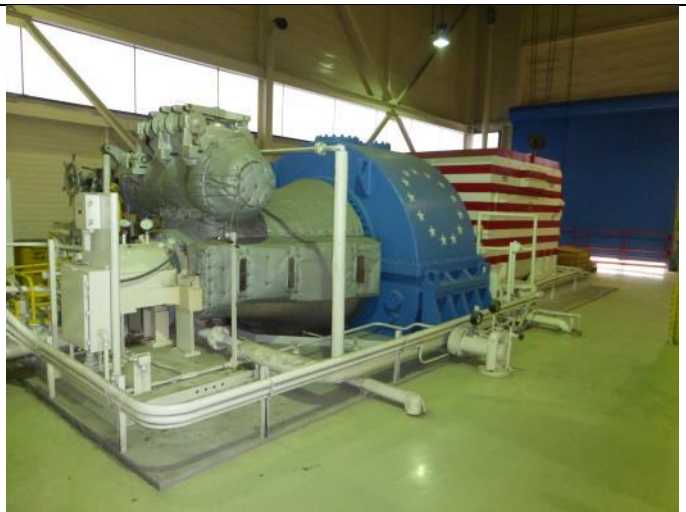


Figure 18: Turbine Generator No. 1 – No Issues Observed



Figure 19: Pit View – Photo from north end of Charging Floor looking south



Figure 20: New Economizer Pass Access Decks



Figure 21: Facility view from up Eisenhower

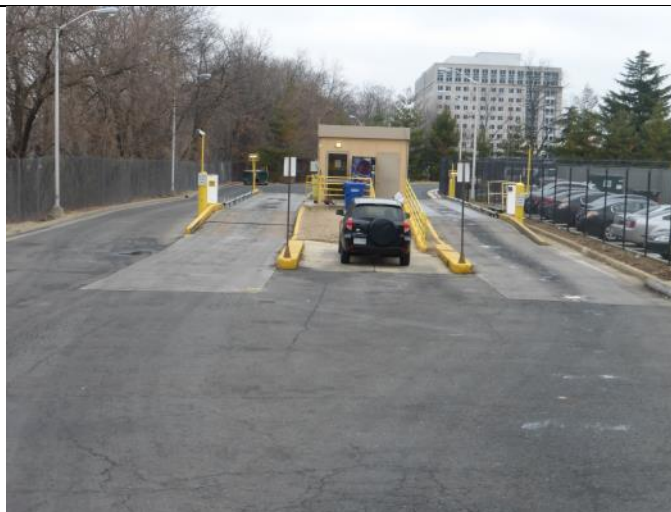


Figure 22: Facility Scales – No Issues Observed



Figure 23: SDA Penthouse No. 3 and Stack – Photo from Turbine Generator Enclosure Roof



Figure 24: Facility View from southwest corner of property