

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

EMISSION OFFSET PROGRAM FEDERAL EQUIVALENCE DEMONSTRATION

Regulation 2-2-423

2004 Report for Years 2001, 2002 and 2003

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EMISSION OFFSET PROGRAM FEDERAL EQUIVALENCE DEMONSTRATION 2004 Report for Years 2001, 2002 and 2003

Summary

This is the 2004 annual offset equivalence report required by Regulation 2-2-423, which covers calendar years 2001, 2002 and 2003. The Bay Area Air Quality Management District's (District) emissions offset program¹ is shown by this report to be at least equivalent to federal offset requirements.

Federal offsets are required from new major facilities² and major modifications at major facilities³ for all non-attainment pollutants. As part of the District's New Source Review (NSR) program, emission offsets are required from both major and non-major facilities and modifications.

Background

Federal guidelines require Emission Reduction Credits (ERCs) be real, permanent, quantifiable, enforceable, and surplus. This is achieved by adjusting ERCs considering the following:

- A District rule that is required for federal attainment demonstration purposes;
- A District rule has been approved into the State Implementation Plan (SIP):
- New Source Performance Standard (NSPS); and
- Maximum Achievable Control Technology (MACT) Standard⁴

The U.S. EPA recognizes that under the District program, ERCs generated at time of banking meet these federal guidelines. Since the District program does not adjust ERCs again at the time of use, EPA guidelines allow an alternative demonstration of offset equivalency. Pursuant to Regulation 2-2-423⁵, the District is required to make an annual demonstration that the quantity of offsets provided for all new or modified sources, less adjustments to those offsets for federal purposes, exceed the quantity of offsets required under federal law for new major facilities and major modifications at major facilities.

¹ Regulations 2-2 and 2-4 as adopted on June 15, 1994 and approved by U.S. EPA as part of the State Implementation Program (SIP) on January 26, 1999 (64 FR 3850)

² For the purposes of this demonstration, a major facility is a facility that has the potential to emit 100 tons per year or more of POC or NOx.

³ For the purposes of this demonstration, a major modification of a major facility is a modification at an existing major facility that will increase the facility's emissions by 40 tons per year of POC or NOx (Regulation 2-1-204).

A National Emission Standards for Hazardous Air Pollutants (NESHAPS) require application of technology-based emissions standards referred to as Maximum Achievable Control Technology (MACT). Post-1990 NESHAPS are also referred to as MACT standards. (Regulation 2-2-221)

⁵ See Appendix A

District staff makes an annual demonstration, with a 3-year look back, that the District's emission offsets program exceeds federal offset requirements for non-attainment pollutants from new major facilities and major modifications at major facilities. For the District, the applicable non-attainment pollutants are precursor organic compounds (POC) and oxides of nitrogen (NO_X) .

The District requires more facilities to obtain offsets than are required by federal law. Under federal law, offsets are required at a 1.15 to 1.0 ratio for a new major facility or a major modification at an existing major facility. In addition to these federal requirements, District Regulation 2-2-302 requires offsets at a 1.15 to 1.0 ratio for all facilities with a potential to emit (PTE) of 35 tons per year or more of NOx or POC. The District also requires offsets at a 1.0 to 1.0 ratio for all facilities with a PTE between 10 and 35 tons per year of NOx or POC. For this latter category, the District provides the POC and NOx credits from the District Small Facility Banking Account (SFBA).

Equivalency Procedure

District staff uses the following procedure to determine offset equivalency. In the ensuing discussion, the term *major NSR project* is used to collectively refer to a new major facility and a major modification of an existing major facility.

- Identify any new major NSR project that received a Permit to Operate (P/O) in the most recent year (2003) of the reporting period. If a major NSR project received a P/O in a previous year (2001 or 2002), that project has already been addressed in a prior report and does not need to be re-evaluated in this report.
- If there is no major NSR project that received a P/O in 2003, then there is no new analysis needed to demonstrate equivalency. If there is a new major NSR project, continue with the procedure, as follows.
- Compile a list of all permit applications for which offsets were required. This includes both major and non-major new source review (NSR) projects.
- For each major NSR project identified in the first step, review the permit application to determine from which banking certificate(s) the emission reduction credits (ERCs) were provided.
- Review original banking application(s) for ERCs that were used to offset the major NSR project. Determine the basis for the original ERCs, and any federally enforceable rules in effect at the time of deposit.
- RACT-adjust the original ERCs for the following types of federally enforceable rules that
 were in effect at the time of use of the ERCs (when the P/O was issued for the major
 NSR project):
 - o District rule that is required for federal attainment demonstration purposes;
 - New or modified District rule that has been adopted into the SIP;
 - New Source Performance Standard (NSPS) rule:
 - Maximum Achievable Control Technology (MACT) rule.

- For each major NSR project, subtract the RACT-adjusted ERCs from the total offsets needed, to determine the offset shortfall for that project.
- If a shortfall is identified, review ERCs and contemporaneous on-site emission reductions⁶ from non-major projects. RACT-adjust these reductions as discussed above.
- Equivalency is achieved when RACT-adjusted offsets from non-major projects meet or exceed the shortfall.

New Major Facilities and Major Modifications During the Reporting Period

Between 2001 and 2003, there was one permit to operate issued for a major NSR project. This was for the Delta Energy Center, Plant #12095. Under Application No. 19414, emission offset credits were provided and a permit to operate was issued on January 7, 2003. The emission increases and emission offset decreases for POC and NOx for the Delta Energy Center are listed in Table 1.

Offset Equivalency Demonstration for Delta Energy Center

Table 1 shows all banking certificates used to offset emissions from the Delta Energy Center project and summarizes the hypothetical RACT adjustments of the original ERCs. It shows the original basis at the time of credit generation and the projected RACT adjustment at time of credit use. Details of the RACT adjustment analysis for each ERC are provided in Appendix B. The following are two examples of the analysis that is summarized in Table 1:

Analysis of Potential Shortfall

Homestake Mining Co. (Banking Application # 18058):

22.07 tons per year of NOx credits were obtained from the shutdown of a blasting operation at the mine. The RACT level at the time of original credit issuance was based on an AP-42 emission factor of 17 lb NOx per ton of ammonium nitrate/fuel oil (ANFO) explosive used. Since there is no District or federal rule limiting NOx emissions from this blasting operation, and since the current AP-42 emission factor is still 17 lb/ton, there is no RACT adjustment required for these ERCs.

Crown, Cork & Seal (Banking Application # 30863):

69.4 tons per year of POC credit were originally issued for the shutdown of several coating sources used to manufacture beverage cans. These sources were subject to District Regulation 8-11 Metal Container, Closure and Coil Coating. Between the time of credit deposit and the time of use, the VOC standard for the interior body spray decreased from 4.3 to 3.5 lb per gallon of coating. This resulted in a RACT adjustment or decrease of 29.1 tons per year of POC credit. The net amount of credit after RACT adjusting is 40.3 tons per year (69-4-29.1=40.3 ton/yr).

The Delta project used 33.247 ton/yr of NOx offsets and 19.999 ton/yr of POC offsets from the POC credits that were originally issued to Crown, Cork & Seal. This is a total of 53.246 ton/yr of

⁶ A contemporaneous on site emission reduction is a verified reduction that has not been banked but would have qualified for banking.

POC credit that was applied to the Delta project. However, based on the discussion above, there is only 40.3 ton/yr of RACT-adjusted POC credit available. This results in a shortfall of 12.946 ton/yr of POC (53.246 - 40.3 = 12.946 ton/yr).

The total shortfall after analysis of the ERCs used for the Delta project was 19.029 tons per year of POC.

Analysis of ERCs from Non-Major Projects

Tables 2 and 3 show a summary of all POC and NOx credits surrendered for 2001 to 2003. Offsets from non-major facilities were reviewed and RACT-adjusted until the amount of ERCs was enough to cover the shortfall. Two applications from non-major projects were reviewed to cover the shortfall for the Delta project. The findings are summarized in Table 4. Details from of the RACT adjustment analysis for each of the non-major ERC applications are provided in Appendix C. Additional analysis from many other non-major projects was not needed.

Conclusion

Staff has demonstrated that the District's offset program is at least equivalent to federal requirements for the reporting period 2001 to 2003. Emission offset credits provided by non-major facilities and non-major modifications at these facilities more than compensate for any hypothetical RACT adjustments for federal purposes at the time of credit use.

Table 1 - D	elta Ener	gy Cent	er AN 1941	4 Offset S	Summary	with RACT Adjustments				
Pollutant Increase	Increase (tons/yr)	Offset Ratio	Pollutant Decrease	Decrease (tons/yr)	RACT Adj. (ton/yr)	Original Basis	RACT at Time of Credit Use Basis	Surrendere Certificate	Emission Reduction Location	Bank Applic. No.
NOx	12.661	1.15	NOx	14.560	0.000	0.031 lb/MM BTU for boiler 0.098 lb/MM BTU for dryer	9-7-301.1 NOx < 30 ppm @ 3% O2 (0.036 lb/MM No change to any rule affecting dryer NOx emissi	657	E.I. DuPont de Nemours Oakley, CA	27269
NOx	28.910	1.15	NOx (from POC ERCs)	33.247	0.000	NOx offsets provided from POC ERCs, See below	NOx offsets provided from POC ERCs, See below for Certificate 664	664	Crown, Cork & Seal Richmond, CA	30863
NOx	19.191	1.15	NOx	22.070	0.000	AP-42 emission factor of 17 lb/ton for blasting	No rule affecting NOx from blasting	670	Homestake Mining Co. Napa, CA	18058
NOx ⁽¹⁾	144.128	1.15	NOx	165.747	0.000	0.1 and 0.25 lb/MM BTU for natural gas and fuel oil	Reg. 9-11 306.4 prohibits non-gaseous fuel. Re- calc. using 0.1 lb/MM BTU and an equivalent amount gaseous fuel	673	PG&E Rodeo, CA	1388
NOx Totals	204.890			235.624	0.000					
⁽¹⁾ RACT adjus	stment of 10	1.25 TPY 1	for B#100. Ori	iginal balanc	e of 308 - 10	11.25 TPY = 206.75 TPY remaining, wh	ich is sufficient to cover 165.747 TPY for NOx from	n B#673.		
POC	1.391	1.15	POC	1.600	0.000	AP-42 em. factor of 5.5 lb/MM scf	No change to any rule affecting boiler or dryer POC emissions	657	E.I. DuPont de Nemours Oakley, CA	27269
POC	20.626	1.15	POC	23.720	-0.800	Paint manufacturing Solvent cleaning VOC = 7.3 lb/gal	No change to Reg. 8-35 for paint manufacturing Reg. 8-16-303.5 solv. cleaning VOC < 0.42 lb/gal	663	Courtaulds Aerospace Richmond, CA	16693
POC ⁽²⁾	17.390	1.15	POC	19.999	-12.946	can coating, inside, bottom & exterior VOC = 3.65, 2.79 & 2.09 lb/gal	eg. 8-11 limits for inside, bottom & exterior coatino VOC < 3.5, 3.5, & 2.1 lb/gal		Crown, Cork & Seal Richmond, CA	30863
POC ⁽³⁾	2.420	1.15	POC	2.783	-1.283	Can mfr. end sealing compound Reg. 8-11-301 VOC < 3.7 lb/gal	Reg. 8-11-301 VOC < 0.1 lb/gal	667	Continental Can Pittsburg, CA	32763
POC	16.696	1.15	POC	19.200	-4.000	Reg. 6-4, 450 10/11/ & 3000 10/6ay limite Reg. 8-12-301; 1.0 lb/gal	Reg. 8-4-301: 3.5 lb/gal No change to Reg. 8-12	669	Dexter Hysol Aerospace Pittsburg, CA	9539
Boo	0.057	4.45	BOO	0.000	0.000	AP-42 em. factors: 1.4 lb/MMscf for	Re-calculating based on newer AP-42 em. factor	070	PG&E	4000
POC	6.957	1.15	POC	8.000	0.000	nat. & ref. gas and 0.76 lb/mgal for fuel oil	(5.5 lb/MM scf for nat. & ref. gas) results in higher emissions. No RACT adjustment.	673	Rodeo, CA	1388
POC Totals	65.480			75.302	-19.029		used for NOv 8 7 053 used for DOC DOC DACT		2 247 ± 10 000 40 2 = 12	

RACT adjustment of 29.1 TPY for B#54. Original balance of 69.4 - 29.1 (RACT) = 40.3 TPY remaining. 33.247 used for NOx & 7.053 used for POC. POC RACT reduction is 33.247 + 19.999 - 40.3 = 12.946 Original balance of 21.3 - 19.8 = 1.5 TPY remaining. RACT reduction for this application is 2.783 - 1.5 = 1.283

						1 through	1 2003	Color Leg Credits fro	jena: m Small Fa	cility Banki	ng Account	t								
Fotal PC	C from	SFBA for	2001 - 2	003:	338.881				<mark>ed for new l</mark> Reductions		ty or Major	Modification								
								Lillioololi	TCGGCTIONS	7 10 11 1										
003 POC	>= 50 TPY		On Site	Offset			2002 POC	>= 50 TP	1	On Site	Offset			2001 PO	C >= 50 TP	Y	On Site	Offset		
	Appl. No. 6523	Increase 0.100	Credit	Ratio 1.15	Decrease 0.115		Plant No.	Appl. No. 4134	Increase 1.460	Credit	Ratio 1.15	Decrease 1.679	Bank No. 817	Plant No	2719	2.300	Credit	Ratio 1.15	Decrease 3.795	
	6795 6896	1.643 0.216		1.15 1.15	1.890 0.248	872	10 11	4662 1821	0.379 10.690	9.490	1.15 1.00	0.436	799	11 51	2736 2818	0.214 0.161		1.15 1.15	0.246	7
)	7147	0.260		1.15	0.299	504	11	1821		3.430	1.15	1.380	706	51	2894	0.483		1.15	0.055	
)	7299 7299	3.044		1.15 1.15	2.087 1.414		11	4192 5700	1.790 2.080	2.080	1.15 1.00	2.059	801	51 51	2894 3285	1.214		1.15 1.15	1.396	
	7693 7756	0.032 0.420		1.15 1.15	0.037 0.483	504 887	16 51	3449 1870	1.230 0.224	0.141	1.15 1.00	1.415	711	901 1438	1819 3742	3.484 0.04	3.484 0.05	1.00 1.15		
)	7919 7948	7.660 0.640		1.15 1.15	8.809 0.794	887 851	72 148	3363 2726	3.528 0.018		1.15 1.15	4.057 0.021	737 768	2066 2300	2653 2482	0.0175 3.65	4.1975	1.15 1.15	0.02	
)	8452	3.910		1.10	3.091	157	148	3101	0.264		1.15	0.304	768	2300	3497	0.054	0.054	1.00		
	8452 6035	0.600		1.15	4.497	887	1438	3138 4307	0.061 0.210	0.210	1.15 1.00	0.070	768	12626 12626	2035 2262	0.571 0.581	0.571	1.15	0.66815	
	6408 5814	9.200 10.740		1.15 1.15	10.580 0.380	801 131		5177 5223	0.080 1.030	0.080 1.030	1.00 1.00			12626 12758	2488 2813	8.579 0.683	8.579	1.00 1.00	0.233	
i	5814 5814			1.15 1.15	0.528 1.290		2066	3821 5850	6.580 2.046		1.15 1.15	7.567 2.352	157 652	12758 12758	2813 3060	1.228	1.228	1.15 1.00		
i	5814			1.15	3.170	581	11928	3990	0.700		1.15	0.805	742	12730	3000	23.259	18.164	1.00	7.616	
	5814 6290	0.576	0.576	1.15	6.983	876	12158 12626	1501 3782	3.201 0.174		1.00 1.15	3.201 0.200	157 682							
!	7638 8187	0.213 0.245		1.15 1.15	0.245 0.282		12626	3951 2298	0.540 0.011		1.15 1.15	0.621 0.013	802 797							
:3	7026	0.462		1.15	0.531	864	12758	3447	0.042		1.15	0.048	797							
	7122 7714	0.030 0.004		1.00 1.15	0.030 0.005	414 49	12758 13637	4579 3893	7.359 3.687		1.15 1.15	8.463 4.24	641 825							
	6914 7048	0.140 0.120	0.140 0.120					5412 5412	3.2		1.15 1.15	2.7 0.98	829 853							
2095	19414	65.480	0.120	1.15		657	14628	2508	10.952	10 500	1.15	12.595	797							
2095	19414 19414			1.15 1.15	23.720 19.999	663 664	14628	6201	10.532 72.068	10.532 23.563	1.00	55.205								
2095 2095	19414 19414			1.15 1.15	2.783 19.200	667 669			Small Fa	cility Bank	Subtotal	10.768								
2095	19414	10 100	49,400	1.000	8.000	673				y Call										
3193	5846 6310	12.100 0.003	12.100	1.15																
	7123 7471	0.245 0.051		1.15 1.15		818														
3637	6805 6674	5.403 1.849	1.161	1.15 1.15	6.213	869 834														
1628	6945	0.018		1.15	0.021	834														
	7642 7768	0.723 2.246	0.622	1.15 1.15																
628	8002 8002	4.671	1.108		3.859	902														
1020	0002	133.044	15.827	1.15	137.196															
		Small Fa	cility Bant																	
			cmy Dam	k Subtotal	3.091															_
			cmy Dam	k Subtotal	3.091															
903 POC	>= 15 and		cmy Dam	k Subtotal	3.091		2002 POC	>= 15 and	1 < 50 TPY					2001 PO	C >= 15 and	d < 50 TPY				
	>= 15 and	< 50 TPY	On Site	Offset		Bank No.			I < 50 TPY	On Site	Offset Ratio	Decrease	Bank No.		C >= 15 and		On Site	Offset Ratio	Decrease	Bank I
lant No.	Appl. No. 7719	< 50 TPY Increase 0.850		Offset Ratio	Decrease 0.850	157	Plant No.	Appl. No. 3820	Increase 0.003	On Site Credit	Ratio 1	Decrease 0.003	157	Plant No	. Appl. No.	Increase 0.032	On Site Credit	Ratio 1.00		
lant No. 5 73	Appl. No. 7719 7085 6586	< 50 TPY Increase 0.850 17.520 0.066	On Site	Offset Ratio 1.00 1.00	Decrease 0.850 17.520 0.066	157 157 157	Plant No. 55 55 55	Appl. No. 3820 3864 5651	0.003 0.033 0.043		Ratio 1 1.00 1.00	0.003 0.033 0.043	157 157 157	Plant No 31 31 55	1850 3249 1867	0.032 0.022 0.043		1.00 1.00 1.00 1.00	0.032 0.022 0.043	
lant No. i i3 i5	Appl. No. 7719 7085	< 50 TPY Increase 0.850 17.520	On Site	Offset Ratio 1.00	Decrease 0.850 17.520	157 157	Plant No. 55 55 55 55 85	Appl. No. 3820 3864	Increase 0.003 0.033		Ratio 1 1.00	0.003 0.033	157 157	Plant No 31 31	Appl. No. 1850 3249	. Increase 0.032 0.022		Ratio 1.00 1.00	0.032 0.022	
ant No. 3 5 5 5	Appl. No. 7719 7085 6586 6857 6929 6930	< 50 TPY Increase	On Site	Offset Ratio 1.00 1.00 1.00 1.00 1.00	0.850 17.520 0.066 0.096 0.008 0.016	157 157 157 157 157 157	Plant No. 55 55 55 55 85 85 86	Appl. No. 3820 3864 5651 4916 5756 6086	0.003 0.033 0.043 1.768 0.058 0.280		Ratio 1.00 1.00 1.00 1.00 1.00	0.003 0.033 0.043 1.768 0.058 0.280	157 157 157 157 157 157	Plant No. 31 31 31 55 55 55 76	. Appl. No. 1850 3249 1867 1868 1868 27474	0.032 0.022 0.043 0.271		Ratio 1.00 1.00 1.00 1.00 1.00	0.032 0.022 0.043 0.006 0.265 15.140	
ant No. 3 5 5 6 6 6 6	Appl. No. 7719 7085 6586 6857 6929 6930 7439 8092	< 50 TPY Increase	On Site	Offset Ratio 1.00 1.00 1.00 1.00 1.00 1.00	Decrease 0.850 17.520 0.066 0.096 0.008 0.016 0.008 0.009	157 157 157 157 157 157 157 157	Plant No. 55 55 55 55 85 85 85 85 255 255	Appl. No. 3820 3864 5651 4916 5756 6086 4003 4347	0.003 0.033 0.043 1.768 0.058 0.280 0.006		Ratio 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1	0.003 0.033 0.043 1.768 0.058 0.280 0.006	157 157 157 157 157 157 157 157	Plant No. 31 31 55 55 55 76 85 85	1850 3249 1867 1868 1868 27474 3092 3238	0.032 0.022 0.043 0.271 15.140 0.474 0.001		1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.00	0.032 0.022 0.043 0.006 0.265 15.140 0.474 0.001	
lant No. 5 73 55 55 55 55 55 55 56	Appl. No. 7719 7085 6586 6857 6929 6930 7439	< 50 TPY Increase	On Site	Offset Ratio 1.00 1.00 1.00 1.00 1.00 1.00	Decrease 0.850 17.520 0.066 0.096 0.008 0.016	157 157 157 157 157 157 157 157 157	Plant No. 55 55 55 55 85 85 85 85 255	Appl. No. 3820 3864 5651 4916 5756 6086 4003	0.003 0.033 0.043 1.768 0.058 0.280 0.006	Credit	Ratio 1 .00 1.00 1.00 1.00 1.00	0.003 0.033 0.043 1.768 0.058 0.280 0.006	157 157 157 157 157 157 157	Plant No. 31 31 55 55 55 76 85	1850 3249 1867 1868 1868 1868 27474 3092	0.032 0.022 0.043 0.271 15.140 0.474		Ratio 1.00 1.00 1.00 1.00 1.00 1.00	0.032 0.022 0.043 0.006 0.265 15.140 0.474	
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ant No. 3 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 6	Appl. No. 7719 7085 6566 6857 6929 6930 7439 8092 7110 6135 6829 7150 8520	< 50 TPY Increase	On Site	Offset Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	Decrease	157 157 157 157 157 157 157 157 157 157	Plant No. 55 55 55 55 86 86 85 85 255 255 255 566 566 837 1179	Appl. No. 3820 3864 5651 4916 5756 6086 4003 4347 5975 1374 3364 3866 3540	Increase 0.003 0.033 0.043 1.768 0.058 0.280 0.006 0.006 0.006 0.007 12.2 9.118 9.87	Credit	Ratio 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00	0.003 0.033 0.043 1.768 0.058 0.280 0.006 0.006 0.007 12.2 0.24 9.118	157 157 157 157 157 157 157 157 157 157	Plant No. 31 31 55 55 55 76 85 85 423 468 646 646 646	. Appl. No. 1850 3249 1867 1868 1868 27474 3092 3238 2367 1942 2352 2352 2369	10.032 0.032 0.043 0.271 15.140 0.474 0.001 0.487 0.898 3.25		Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	0.032 0.022 0.043 0.006 0.265 15.140 0.474 0.001 0.487 0.898 1.888 1.362 0.16	
lant No. 5 1/3 1/5 1/5 1/5 1/5 1/5 1/5 1/5 1/5 1/5 1/5	Appl. No. 7719 7085 6586 6857 6929 6930 7439 8092 7110 6135 6829 7150	< 50 TPY Increase 0.850 17.520 0.066 0.096 0.008 0.016 0.008 0.1430 0.016 0.001 1.430 0.001 1.5400 0.001	On Site	Offset Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	Decrease 0.850 17.520 0.066 0.096 0.008 0.016 0.008 0.009 9.100 1.430 0.500 0.018	157 157 157 157 157 157 157 157 157 157	Plant No. 55 55 55 55 85 85 85 255 255 556 837 1179 1190	Appl. No. 3820 3864 56651 4916 5756 6086 4003 4347 5975 1374 3354 3856	Increase 0.003 0.033 0.043 1.768 0.058 0.280 0.006 0.006 0.006 12.2 0.24 9.118	Credit	Ratio 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1	0.003 0.033 0.043 1.768 0.058 0.280 0.006 0.006 12.2 0.24 9.118 9.87 0.016 0.08	167 167 167 167 167 167 167 167 167 167	Plant No. 31 31 55 55 55 56 86 85 423 468 646 646	1860 3249 1867 1868 1868 27474 3092 3238 2367 1942 2352 2352	. Increase 0.032 0.022 0.043 0.271 15.140 0.474 0.001 0.487 0.898 3.25		Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	0.032 0.022 0.043 0.006 0.265 15.140 0.474 0.001 0.487 0.898 1.888 1.362	
ant No. 3 5 5 5 5 6 9 8 6 6 6 6 6 6 6 6 6	Appl. No. 7719 7085 6586 6587 6929 6930 7439 8092 7110 66329 7150 8520 3894 7054	< 50 TPY Increase 0.850 17.520 0.066 0.008 0.016 0.008 0.009 9.100 1.430 0.018 0.001 15.400 0.294 2.053	On Site	Offset Ratio 1.000 1.000 1.000 1.000 1.000 1.000 1.000 1.000 1.000 1.000 1.000 1.000 1.000 1.000 1.000 1.000	Decrease	157 157 157 157 157 157 157 157 157 157	Plant No. 55 55 55 55 85 85 85 85 255 255 566 887 1179 1190 1257 1257	Appl. No. 3820 3864 5651 4916 5756 6086 4003 4347 5975 1374 3364 3866 3540 4601 6315	Increase	Credit	Ratio 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1	0.003 0.033 0.043 1.768 0.058 0.280 0.006 0.006 0.067 12.2 0.24 9.118 9.87 0.016 0.08	167 167 167 167 167 167 167 167 167 167	Plant No. 31 31 55 55 55 76 85 423 488 646 646 646 1190 3652 3652 3652	. Appl. No. 1860 3249 1867 1868 27474 3092 3238 2367 1942 2352 2369 2079 2111 2398	Increase		Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	0.032 0.022 0.043 0.006 0.265 15.140 0.474 0.001 0.487 0.898 1.888 1.362 0.16 0.131 0.191	
ant No. 3 3 5 5 5 5 5 5 5 5 6 6 6 6 6 6 6 6 6 6	Appl. No. 7719 7086 6586 6586 6897 6929 6930 7410 6135 6129 7150 8520 3694 7054 7209 7731 6725	< 50 TPY Increase	On Site	Offset Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	Decrease	157 157 157 157 157 157 157 157 157 157	Plant No. 56 55 55 55 85 85 85 85 255 255 255 556 566 837 1179 1190 1257 1257 1403 1404	Appl. No. 3820 3864 5651 4916 5756 6086 4003 4347 5975 1374 3354 3856 3540 4601 3349 6315 4928 4975	Increase	Credit	Ratio 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1	0.003 0.033 0.043 1.768 0.250 0.056 0.006 0.006 0.067 12.2 0.24 9.118 9.87 0.016 0.08	157 157 157 157 157 157 157 157 157 157	Plant No. 31 31 55 56 55 66 86 86 423 468 646 646 1190 3662 3662 3662 3661	. Appl. No. 1850 3249 1867 1868 1868 27474 3092 3238 2367 1942 2352 2362 2362 2369 2079 2111 2398 2453 2608	Increase		Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	0.032 0.022 0.043 0.006 0.265 15.140 0.474 0.001 0.487 0.888 1.362 0.16 0.131 0.196 0.131 0.196 0.178	
ant No. 3	Appl. No. 7719 7085 6586 6586 6987 6929 6930 7439 8092 7110 6135 6829 7150 8620 3894 7054 7759 7731 6725 7724 6669	< 50 TPY Increase	On Site Credit	Offset Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	Decrease 0.850 17.520 0.066 0.056 0.008 0.016 0.008 0.009 9.100 0.148 0.009 0.018 0.001 15.400 0.294 2.053 0.568	157 157 157 157 157 157 157 157 157 157	Plant No. 56 55 55 85 85 85 85 85 255 255 255 556 556 557 1179 1190 1257 1257 1257 1404 2168 2246	Appl. No. 3820 3864 5851 4916 5756 6086 4003 4347 5975 1374 3354 3856 39540 4601 3349 6315 4928 4975 4928	Increase	Credit	Ratio 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1	0.003 0.033 0.043 1.768 0.056 0.006 0.006 0.006 0.007 12.2 0.24 9.118 9.87 0.016 0.08 0.08 0.08 1.22 10.44	157 157 157 157 157 157 157 157 157 157	Plant No. 31 31 55 55 55 56 56 56 66 423 646 646 1190 3662 3662 3691 5474 6816		Increase		Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	0.032 0.032 0.033 0.006 0.2656 15.140 0.474 0.001 0.487 0.888 1.362 0.16 0.131 0.196 1.950 0.1789 5.71	
ant No. 3 5 5 5 5 5 5 5 6 6 6 6 6 6 6 6 6 6 6 6	Appl. No. 7719 7096 6856 6857 6929 6930 7439 8092 71110 6135 6629 7150 6520 3694 7054 7209 7724 66569 6130	< 50 TPY Increase	On Site Credit	Offset Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	Decrease	157 157 157 157 157 157 157 157 157 157	Plant No. 55 55 55 85 85 85 85 85 255 255 255 566 837 1179 1190 1257 1403 1404 2168 2246	Appl. No. 3820 3864 5651 4916 5756 6086 4003 3854 3856 3540 4601 3349 6315 4928 4975 4927 35641 6178	Increase	Credit	Ratio 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1	0.003 0.033 1.768 0.058 0.058 0.006 0.006 0.007 12.2 0.24 9.118 9.87 0.001 8.3 12.2 10.44 10.45 5.275	157 157 157 157 157 157 157 157 157 157	Plant No. 31 31 55 56 56 56 56 66 646 646 646 646 562 3662 3662 3661 5474 6616 6035	. Appl. No. 1850 1867 1868 1868 1868 1868 1868 27474 3092 2367 1942 2362 2369 2079 2111 2398 2453 2808 2609 1446 1828	Increase		Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	0.032 0.032 0.033 0.006 0.056 15.140 0.474 0.001 0.487 0.888 1.362 0.16 0.131 0.196 0.112 0.789 5.77 0.58	
ant No. 3 5 5 5 5 5 5 6 6 6 6 6 6 6 6 6 6 6 6 6	Appl. No. 7719 7006 6856 6857 6829 68930 7439 8092 71110 6135 6636 7150 8520 3684 7054 7209 77731 6725 7756 6669 6130 6686 7294	< 50 TPY Increase	On Site Credit	Offset Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	Decrease	157 157 157 157 157 157 157 157 157 157	Plant No. 55 55 55 85 85 85 85 85 255 255 255 566 837 1179 1190 1257 1403 1404 2188 2246 2254 2371	Appl. No. 3620 36864 5651 4916 5756 6086 4003 4347 5975 1374 3364 3640 3640 3640 4601 3349 6315 4928 4975 4927 3541 6178 32 32	Increase	Credit	Ratio 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1	0.003 0.033 0.033 1.768 0.058 0.280 0.006 0.067 12.2 0.24 9.87 0.016 0.088 0.001 8.3 12.2 10.44 10.875 5.275 0.844	157 157 157 157 157 157 157 157 157 157	Plant No. 31 31 55 55 55 55 55 66 68 646 646 646 646 646 646 646 646 6	J. Appl. No. 1860 1860 1860 1860 1860 1860 1860 1860	Increase		Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	0.032 0.022 0.043 0.006 0.265 15.140 0.474 0.001 0.474 0.001 0.487 0.888 1.888 1.888 1.962 0.16 0.131 0.196 0.112 0.789 5.71 6.688 0.14 1.761	
lant No	Appl. No. 7719 7719 7086 6856 6857 6829 6930 7439 8630 7410 6135 6829 7150 8520 3694 7054 7209 7731 6725 7024 6569 6130 66666 7294 7438 7563	< 50 TPY Increase	On Site Credit	Offset Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	Decrease 0.850 17.520 0.066 0.056 0.008 0.018 0.009 0.109 0.018 0.009 0.118 0.001 15.400 0.294 2.053 0.588 0.020 11.910 0.019 0.002 11.000	157 157 157 157 157 157 157 157 157 157	Plant No. 56 55 55 85 85 85 85 85 255 255 255 556 556 557 1179 1190 1257 1257 1257 1404 2168 2246 2254 2371 2371	Appl. No. 3820 3864 5661 4916 5756 6086 4003 4347 5975 1374 3354 3866 3540 4601 3349 6315 4928 4975 3541 6178 32 32 4578 55417	Increase	Credit	Ratio 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1	0.003 0.033 0.033 0.053 0.058 0.260 0.006 0.006 0.007 12.2 0.24 9.118 9.87 0.016 0.008 0.001 12.2 10.44 10.875 5.275 5.275 0.844 1.039 0.001	157 157 157 157 157 157 157 157 157 157	Plant No. 31 31 55 55 55 56 76 85 423 488 646 646 1190 3652 3652 3652 3652 3652 3652 3652 3651 5474 6916 8035 893 99665 10289 10437). Appl. No. 1860 1860 1860 1860 1860 1860 1860 1860	Increase	Credit	Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	0.032 0.022 0.043 0.006 0.265 15.140 0.474 0.001 0.474 0.001 0.487 0.888 1.888 1.382 0.16 0.131 0.196 0.122 0.789 5.71 6.688 0.14 1.761	
lant No	Appl. No. 7719 7719 7085 6696 6887 69929 6930 7439 8092 7110 66829 7110 66829 7150 8620 7731 6725 7054 7054 6726 6725 6726 6726 6726 6726 6726 6726	< 50 TPY Increase	On Site Credit	Offset Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	Decrease	157 157 157 157 157 157 157 157 157 157	Plant No. 55 55 55 55 85 85 85 85 255 255 255 566 837 1179 1190 1257 1403 1404 2188 2246 2371 2371 2371	Appl. No. 3620 36864 5661 4916 57666 6086 4003 4347 5975 1374 3364 3856 3856 34928 4928 4927 33149 6315 6178 32 4578 5417	Increase 0.003 0.033 0.043 1.768 0.058 0.280 0.006 0.006 0.006 0.007 12.2 0.24 9.118 9.87 0.016 0.08 0.001 8.3 12.2 10.44 10.875 5.275 1.943	Credit	Ratio 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1	0.003 0.033 0.033 0.053 0.058 0.050 0.006 0.006 7 12.2 0.24 9.118 9.87 0.016 0.08 0.08 0.08 0.08 0.08 0.08 0.08 0.0	157 157 157 157 157 157 157 157 157 157	Plant No. 31 31 55 56 55 56 55 56 56 56 56 56 56 66 646 64	J. Appl. No. 1850 1850 1868 1868 1868 1868 1868 27474 3092 2367 1942 2362 2362 2362 2362 2369 2079 2111 2398 2563 2509 1446 2612 2614 2621 2634 2621	Increase	Credit	Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	0.032 0.022 0.043 0.066 0.265 15.140 0.074 0.001 0.487 0.188 1.362 0.16 0.131 0.196 0.112 0.789 5.71 1.484 1.761	
lant No. 5 5 73 5 73 5 75 5 75 5 75 5 75 5 75 5	Appl. No. 7719 7086 6696 6857 6999 6930 7439 8092 7110 6135 6829 7150 8620 7150 8620 7731 6725 7054 7209 7731 6725 7024 6669 6130 6686 7734 7438 7458 7458 7458 7458 7458	< 50 TPY Increase	On Site Credit	Offset Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	Decrease	157 157 157 157 157 157 157 157 157 157	Plant No. 55 55 55 85 85 85 85 85 255 255 255 556 666 837 1179 1190 1257 1403 1404 2188 2246 2254 2371 2371 2371 2371 2371 2918	Appl. No. 3620 3620 36864 5661 4916 55756 6086 6086 4003 4347 4347 43354 3364 3364 3601 3349 6315 4928 4927 35417 6178 5417 5417 5417 5417 5417	Increase 0.003 0.033 0.043 1.768 0.0280 0.056 0.056 0.057 12.22 0.24 9.118 9.877 0.016 8.3 12.22 10.44 10.875 5.275 1.943 0.001	Credit	Ratio 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.	0.003 0.033 0.033 0.043 1.768 0.280 0.006 0.067 12.2 0.24 9.87 0.016 0.088 0.001 8.3 12.2 10.44 1.087 5.276 0.044 1.087 5.276 0.001 2.88 0.001 1.28 1.28 1.28 1.28 1.28 1.28 1.28 1.2	157 157 157 157 157 157 157 157 157 157	Plant No. 31 31 55 55 55 55 55 56 66 646 646 646 646 64). Appl. No. 1850 1860 1861 1867 1868 186	Increase	Credit	Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	0.032 0.022 0.023 0.006 0.265 15.140 0.011 0.474 0.001 0.487 0.888 1.888 1.888 1.886 0.131 0.196 0.112 0.789 5.71 6.685 0.114 1.761	
lant No. : : : : : : : : : : : : : : : : : : :	Appl. No. 7719 77086 66566 6857 6930 7439 80952 7110 6135 6829 7150 3694 7054 7209 7731 6725 7024 6659 6130 66696 6130 66696 6130 66806 7294 7438 77653 7829 8000 8000 8000 8000	< 50 TPY Increase	On Site Credit	Offset Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	Decrease	157 157 157 157 157 157 157 157 157 157	Plant No. 56 55 55 85 85 85 85 85 255 255 255 556 556 557 1179 1190 1257 1257 1257 1257 1257 1271 2371 2371 2371 2371 2371 2371 237	Appl. No. 3620 3620 3664 5661 4916 55766 6086 4003 4347 5976 1374 3364 3364 3364 3601 3349 6315 4927 3541 6178 32 32 4578 5417 5417 5417 52072 3878 6112 2072 3878 6112	Increase	Credit	Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	0.003 0.033 0.033 0.053 0.058 0.260 0.006 0.006 0.007 12.2 0.24 9.118 9.87 0.016 0.08 0.001 8.3 12.2 10.44 10.875 5.275 0.244 1.089 0.001 2.88 0.001 1.29 1.29 1.29 1.29 1.29 1.29 1.29 1.2	157 157 157 157 157 157 157 157 157 157	Plant No. 31 31 55 55 55 56 76 85 52 56 86 423 488 646 646 1190 562 3652 3652 3652 3652 3652 10289 893 9966 10289 10437 10438). Appl. No. 1860 1860 1860 1860 1860 1860 1860 1860	Increase	Credit	Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	0.032 0.022 0.043 0.006 0.265 15.140 0.474 0.001 0.487 0.888 1.888 1.382 0.16 0.131 0.196 0.122 0.789 5.71 6.688 0.144 1.761 1.48 0.011 1.045 9.9 1.48 0.011 1.012 6.9	
lant No. 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Appl. No. 7719 7086 6686 6887 68929 6930 7439 8092 7110 6135 6629 7150 8620 7750 6626 7750 6686 7751 6686 7751 6686 7752 7752 7752 7752 7752 7752 7752 775	< 50 TPY Increase	On Site Credit	Offset Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	Decrease 0.850 17.520 0.066 0.008 0.016 0.008 0.009 9.100 1.430 0.500 0.018 0.001 15.400 0.294 2.053 0.598 0.020 12.020 11.910 0.019 0.002 0.019 0.002 0.019 0.002 0.019 0.002 0.003 0.114 0.019 0.002 0.003 0.114 0.019 0.566 0.384 1.527 2.077	157 157 157 157 157 157 157 157 157 157	Plant No. 55 55 55 55 85 85 85 85 85 255 255 255	Appl. No. 3620 3620 36864 5661 4916 5766 6086 4003 4347 5976 1374 3364 3856 3856 38540 4601 3349 6315 4928 4978 4977 32 4578 5417 2072 3878 6112 27215	Increase	Credit	Ratio 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.	0.003 0.033 0.033 1.768 0.058 0.006 0.006 0.006 7 12.2 0.24 9.118 9.87 0.016 0.081 12.2 10.44 10.875 5.275 0.844 1.099 0.001 28.8 0.017 5.377 1.699 1.	157 157 157 157 157 157 157 157 157 157	Plant No. 31 31 31 55 55 55 56 67 86 85 423 488 646 646 61190 3652 3662 3662 3669 5474 6916 6036 6036 6036 6037 10438 10	. Appl. No. 1850 1850 1868 1868 1868 1868 1868 1868 27474 3092 2367 1942 2362 2362 2362 2362 2362 2362 2369 2079 2111 2398 2509 1446 2608 2609 1446 2618 2624 2621 2634 2621 2634 2621 2634 2621 2636 2636 2636 2636 2636 2636	Increase	Credit	Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	0.032 0.022 0.043 0.006 0.265 15.140 0.474 0.001 0.487 0.898 1.388 1.362 0.16 0.131 0.196 1.196 0.112 0.789 5.717 6.689 0.144 1.761 10.45 9.9 1.488 0.011 16.19	
ant No. 3	Appl. No. 7719 77086 6666 6857 69529 6930 7439 8092 7110 6135 6629 7150 8620 7150 8620 7731 6725 7024 6666 6725 7024 6666 77294 7438 7438 7438 7438 7438 7438 7438 743	< 50 TPY Increase	On Site Credit	Offset Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	Decrease	157 157 157 157 157 157 157 157 157 157	Plant No. 55 55 55 85 85 85 85 85 85 255 255 255	Appl. No. 3620 3620 36864 5661 4916 55756 6086 6086 4003 33544 3364 3364 3364 3601 3374 4601 3374 4927 35417 2072 3678 5417 2072 3678 5417 2072 2072 27215 27215 27215	Increase	Credit	Ratio 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.	0.003 0.033 0.033 0.053 0.056 0.006 0.006 0.007 12.2 0.24 9.118 9.87 0.016 0.08 0.007 12.2 10.44 10.875 5.275 0.24 10.91	157 157 157 157 157 157 157 157 157 157	Plant No. 31 31 55 55 55 56 76 85 52 56 86 423 488 646 646 1190 562 3652 3652 3652 3652 3652 10289 893 9966 10289 10437 10438). Appl. No. 1860 1860 1860 1860 1860 1860 1860 1860	Increase	Credit 5	Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	0.032 0.022 0.043 0.026 0.056 15.140 0.077 0.898 1.362 0.16 0.131 0.196 0.112 0.789 5.71 1.484 0.011 10.45 9.9 1.486 0.011 10.45 9.9 7.183 1.156 0.45	
ant No. 1 13 3 5 5 5 5 5 5 5 5 5 5 5 5 6 6 6 6 6 6	Appl. No. 7719 77086 6867 6897 6930 6930 6930 6939 6930 7439 8092 7110 6135 6829 7150 8620 7150 8620 7751 6725 77054 6725 7024 6669 6130 6686 7294 7438 7763 8000 8000 8000 8000 8000 8000 8000 80	< 50 TPY Increase	On Site Credit	Offset Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	Decrease	157 157 157 157 157 157 157 157 157 157	Plant No. 56 55 55 85 85 85 86 85 86 87 1179 1190 1257 1257 1257 1257 1257 1271 1271 1271	Appl. No. 3620 3620 36864 5661 4916 55766 6086 4003 4347 5975 3354 3364 3364 3364 3369 6315 4927 3541 6178 32 32 32 4578 5417 5417 2072 3878 6112 27215 27215 27215 27215 27215 27215	Increase	Credit	Ratio 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.	0.003 0.033 0.033 0.053 0.058 0.260 0.006 0.006 0.007 12.2 0.24 9.118 9.87 0.016 0.08 0.001 8.3 12.2 10.44 1.087 5.275 0.244 1.089 0.001 1.55 0.248 1.089 0.001 1.089 1.55 0.175 0.1	157 157 157 157 157 157 157 157 157 157	Plant No. 31 31 31 55 55 55 76 85 86 423 488 646 646 1190 3662 3662 3662 3691 5474 6916 8036 8693 9565 10289 10437 10438 10961 11180 10261 11180 112545). Appl. No. 1860 1860 1860 1860 1860 1860 1860 1860	Increase	5.000	Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	0.032 0.022 0.043 0.006 0.265 15.140 0.474 0.001 0.474 0.001 0.487 0.888 1.888 1.888 1.888 0.16 0.131 0.196 0.131 0.196 1.965 0.112 0.789 5.71 6.688 0.141 1.761 10.45 9.9 1.48 0.011 10.12 6.9 7.183 1.15 0.9 3.60 0.23	
ant No. ant	Appl. No. 7719 77086 6596 6597 6596 6939 6930 77439 8092 77110 6135 6829 77150 8520 73694 7209 77316 6725 6726 6726 6729 8000 8000 8000 8000 8000 8000 8000 80	< 50 TPY Increase	On Site Credit	Offset Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	Decrease 0.850 17.520 0.066 0.008 0.016 0.008 0.016 0.008 0.001 1.430 0.500 0.018 0.001 15.400 0.020 11.910 0.002 11.910 0.019 0.002 11.910 0.019 0.002 0.003 0.114 0.019 0.056 0.384 1.527 2.077 0.120 0.662 0.750 0.662 0.750 0.420 0.068	157 157 157 157 157 157 157 157 157 157	Plant No. 55 55 55 85 85 85 85 85 255 255 255 556 556	Appl. No. 3820 3864 5861 4916 55756 6086 6086 4003 4347 5975 3354 3354 3354 33540 4001 3349 401 3349 401 3349 401 3349 407 3541 6178 32 32 4578 5417 2072 372 4576 6112 27215 27215 27215 27215 27215 27215 27215 27215 27215 27215 27215 27215 27215	Increase	Credit	Ratio 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.	0.003 0.033 0.033 1.768 0.058 0.006 0.006 0.007 12.2 0.24 9.118 9.87 0.001 18.3 12.2 10.44 1.099 0.001 28.8 0.015 5.275 0.3717 16.93 1.55 0.175 0.1 1.91 0.16 0.16 0.175	157 157 157 157 157 157 157 157 157 157	Plant No. 31 31 31 55 55 55 76 85 86 423 488 646 646 1190 3662 3662 3662 3691 5474 6916 8036 8693 9565 10289 10437 10438 10961 11180 10261 11180 112545). Appl. No. 1860 1860 1860 1860 1860 1860 1860 1860	Increase	Credit 5	Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	0.032 0.022 0.043 0.026 0.056 15.140 0.077 0.898 1.362 0.16 0.131 0.196 0.112 0.789 5.71 1.484 0.011 10.45 9.9 1.486 0.011 10.45 9.9 7.183 1.156 0.45	
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lant No. 1 13 13 13 13 13 13 13 13 13 13 13 13 13 1	Appl. No. 7719 7086 6867 6897 68930 6930 6930 6930 6135 6829 7110 6135 6829 7150 3694 7054 7209 7731 6725 7024 6669 6130 66897 6891 6897 6892 6898 6897 6892 6897 6892 6897 6891 8203 8258 7316 6897 6791 6791 7165	< 50 TPY Increase	On Site Credit	Offset Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	Decrease	157 157 157 157 157 157 157 157 157 157	Plant No. 56 55 55 85 85 85 86 85 86 87 1179 1190 1257 1257 1257 1257 1271 1283 12183 12183 12183 12183 12183 12187 12187 12567 12567 1267 1267 1271 1271 1271 1271 1271 12	Appl. No. 3620 3620 36864 5661 4916 55766 6086 4003 4347 5975 3354 3354 3354 3354 6315 4927 3374 4927 3477 5417 5417 5417 5417 5417 5417 5417 5	Increase	Credit	Ratio 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.	0.003 0.033 0.033 0.053 0.058 0.260 0.006 0.006 0.007 12.2 0.24 9.118 9.87 0.016 0.08 0.001 8.3 12.2 10.44 10.875 5.275 0.244 1.089 0.001 2.88 0.0175 3.717 16.893 1.55 0.175	157 157 157 157 157 157 157 157 157 157	Plant No. 31 31 31 55 55 55 76 85 86 423 488 646 646 1190 3662 3662 3662 3691 5474 6916 8036 8693 9565 10289 10437 10438 10961 11180 10261 11180 112545). Appl. No. 1860 1860 1860 1860 1860 1860 1860 1860	Increase	5.000	Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	0.032 0.022 0.043 0.006 0.265 15.140 0.474 0.001 0.474 0.001 0.487 0.888 1.888 1.888 1.888 0.16 0.131 0.196 0.131 0.196 1.965 0.112 0.789 5.71 6.688 0.141 1.761 10.45 9.9 1.48 0.011 10.12 6.9 7.183 1.15 0.9 3.60 0.23	
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lant No. lant No. 3 '3 '3 '5 '5 '5 '5 '5 '5 '5 '5 '5 '5 '5 '5 '5	Appl. No. 7719 77086 6867 6857 6859 6930 77439 8092 77110 6135 6829 77150 8520 73694 7209 7751 6725 6726 6860 6729 8000 8000 8000 8000 8000 8000 8000 80	< 50 TPY Increase	On Site Credit	Offset Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	Decrease 0.850 17.520 0.066 0.008 0.016 0.008 0.016 0.008 0.001 1.430 0.500 0.018 0.001 15.400 0.020 11.910 0.002 11.910 0.002 0.003 0.114 0.019 0.056 0.384 1.527 2.077 0.120 0.652 6.750 0.75	157 157 157 157 157 157 157 157 157 157	Plant No. 55 55 55 85 85 85 85 85 85 255 255 255 255 556 556	Appl. No. 3820 3864 5861 4916 55756 6086 6086 4003 4347 5975 3354 3354 3354 33540 4001 3349 6315 4975 3541 6178 32 32 4975 4977 5477 578 6112 27215 27	Increase	Credit	Ratio 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.	0.003 0.033 0.033 1.768 0.058 0.056 0.066 0.066 0.067 12.2 0.24 9.118 9.87 0.016 0.08 0.006 0.087 12.2 10.44 10.875 5.275 0.844 1.099 0.001 28.8 0.017 28.8 0.175 3.717 16.835 0.11 0.91 0.46 25.53 0.316 11 0.24 1.09 0.09 0.09 0.09 0.09 0.09 0.09 0.09	157 157 157 157 157 157 157 157 157 157	Plant No. 31 31 31 55 55 55 76 85 86 423 488 646 646 1190 3662 3662 3662 3691 5474 6916 8036 8693 9565 10289 10437 10438 10961 11180 10261 11180 112545). Appl. No. 1860 1860 1860 1860 1860 1860 1860 1860	Increase	5.000	Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	0.032 0.022 0.043 0.006 0.265 15.140 0.474 0.001 0.474 0.001 0.487 0.888 1.888 1.888 1.888 0.16 0.131 0.196 0.131 0.196 1.965 0.112 0.789 5.71 6.688 0.141 1.761 10.45 9.9 1.48 0.011 10.12 6.9 7.183 1.15 0.9 3.60 0.23	
lant No. lant No. 3 '3 '3 '5 '5 '5 '5 '5 '5 '5 '5 '5 '5 '5 '5 '5	Appl. No. 7719 7708 6656 6857 6930 6930 7439 8092 7110 6135 6829 7110 6135 6829 7710 8520 3694 7054 7209 7731 6725 7024 66669 6130 66666 6130 66666 6130 66666 6130 66666 6130 66666 6130 66666 6130 66666 6130 66666 6130 66666 6130 66666 6130 66666 6130 66666 6130 66666 6130 66666 6130 66666 6130 66666 6130 66666 6130 66666 6130 6130	< 50 TPY Increase	On Site Credit	Offset Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	Decrease	157 157 157 157 157 157 157 157 157 157	Plant No. 56 55 55 85 85 85 86 85 86 87 1179 1190 1257 1257 1257 1257 1257 1271 1283 12183 12183 12183 12183 12183 12183 12181 12187 13170 13170 13170 13170 13170 13171 13212 13312 13318	Appl. No. 3620 3620 36864 5661 4916 55766 6086 4003 4347 5975 1374 3354 3364 3660 3349 6315 4927 3354 4975 4927 3364 6172 327 27215	Increase	Credit	Ratio 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.	0.003 0.033 0.033 0.033 0.050 0.006 0.006 0.006 0.007 12.2 0.24 9.118 9.87 0.016 0.08 0.001 8.3 12.2 10.44 10.875 5.275 0.844 1.089 0.001 28.8 0.075 0.175 0.175 0.175 0.191 0.46 2.553 0.316 0.175 0.1	157 157 157 157 157 157 157 157 157 157	Plant No. 31 31 31 55 55 55 76 85 86 423 488 646 646 1190 3662 3662 3662 3691 5474 6916 8036 8693 9565 10289 10437 10438 10961 11180 10261 11180 112545). Appl. No. 1860 1860 1860 1860 1860 1860 1860 1860	Increase	5.000	Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	0.032 0.022 0.043 0.006 0.265 15.140 0.474 0.001 0.474 0.001 0.487 0.888 1.888 1.888 1.888 0.16 0.131 0.196 0.131 0.196 1.965 0.112 0.789 5.71 6.688 0.141 1.761 10.45 9.9 1.48 0.011 10.12 6.9 7.183 1.15 0.9 3.60 0.23	
lant No. lant No. 3 '3 '3 '5 '5 '5 '5 '5 '5 '5 '5 '5 '5 '5 '5 '5	Appl. No. 7719 77086 6867 6857 6859 6930 77439 8092 77110 6135 6829 77150 8520 73694 7209 7751 6725 6726 6860 6729 8000 8000 8000 8000 8000 8000 8000 80	< 50 TPY Increase	On Site Credit	Offset Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	Decrease 0.850 17.520 0.066 0.008 0.016 0.008 0.016 0.008 0.017 0.009 1.430 0.500 0.018 0.001 1.430 0.001 1.430 0.001 1.430 0.001 1.430 0.001 1.430 0.001 1.430 0.001 1.430 0.001 1.430 0.001 0.001 0.002 1.0002 1.0003 0.001 0.001 0.002 0.003	157 157 157 157 157 157 157 157 157 157	Plant No. 56 55 55 85 85 85 86 85 86 87 1179 1190 1257 1257 1257 1257 1257 1271 1283 12183 12183 12183 12183 12183 12183 12181 12187 13170 13170 13170 13170 13170 13171 13212 13312 13318	Appl. No. 3820 3864 5861 4916 55756 6086 6086 4003 3864 4347 5975 1374 3384 33866 3349 6315 4928 4975 4928 32 4976 4927 3541 6178 32 32 6172 7215 2721	Increase	Credit	Ratio 1 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.	0.003 0.033 0.033 0.033 1.768 0.260 0.006 0.006 0.006 0.007 12.2 0.24 9.118 9.87 0.016 0.08 0.001 12.2 10.44 10.875 5.275 0.844 1.0895 0.001 28.81 0.175 3.717 16.893 1.555 0.11 0.91 0.46 26.53 0.316 0.16 28.63 0.16 0.16 28.75 0.11 0.91 0.17 0.17 0.18 0.17 0.18 0.18 0.17 0.18 0.18 0.17 0.18 0.18 0.18 0.18 0.18 0.18 0.18 0.18	157 157 157 157 157 157 157 157 157 157	Plant No. 31 31 31 55 55 55 76 85 86 423 488 646 646 1190 3662 3662 3662 3691 5474 6916 8036 8693 9565 10289 10437 10438 10961 11180 10261 11180 112545). Appl. No. 1860 1860 1860 1860 1860 1860 1860 1860	Increase	5.000	Ratio 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0	0.032 0.022 0.043 0.006 0.265 15.140 0.474 0.001 0.474 0.001 0.487 0.888 1.888 1.888 1.888 0.16 0.131 0.196 0.131 0.196 1.965 0.112 0.789 5.71 6.688 0.141 1.761 10.45 9.9 1.48 0.011 10.12 6.9 7.183 1.15 0.9 3.60 0.23	
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Second 12,900		3 - Sum	_						Credits from	m Small Fa	cility Bankir	na Account		l l							
March Part March	otal N	Ox from S	FBA for	2001 - 20	03:	371.111							Modification								
Martin M																					
	002 NO	. co TDV						2002 NO							2004 NO	. so TDV					
Company Comp	UU3 NUX	>= 30 IPY		On Site	Offset			ZUUZ NUX	>= 50 IPY		On Site	Offset			2001 NOX	>= 30 IPT		On Site	Offset		
6 50 14 12300 115 790 80 15 1070 116 4.22 50 1186 127 225 115 15 200 20 116 116 117 117 117 117 117 117 117 117	Plant No.	Appl. No.				Decrease	Bank No.	Plant No.	Appl. No.	Increase	Credit		Decrease	Bank No.	Plant No.	Appl. No.		Credit			
Second Color	0									44.116	5.067	1	4.00	550							
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Small Facility Bank Substant 0.43 15290 2213 116 118 70	4626	7642		54 800																	
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56 6829 0.174 1 0.174 157 56 5661 0.474 1 0.474 949 56 1888 1.189 1 1.189 95 56 6830 0.174 1 0.174	Plant No.	Appl. No.	Increase			Decrease	Bank No.	Plant No.	Appl. No.	Increase			Decrease	Bank No.	Plant No.	Appl. No.	Increase			Decrease	Bank No
56 6930 0.174 1 0.174 157 226 4003 0.211 1 0.16 157 560 2426 0.944 1 0.9444	255				1							1							1		
56 7439 0 382 1 0 382 157 256 4003 1 1 0.051 554 550 3370 4.406 1 4.406 1 9 398 3994 25.6 1 1 25.6 157 255 4437 0.211 1 0.211 157 1299 437 7.2 1 1 7.2 1 7.2 1 7.2 1 7.2 1 7.2 1 7.2 1 7.2 1 7.2					1							1							1		
91 \$994 \$2.6					1					0.211		1							1		
257 6886 0.774 1 0.774 434 550 6537 0.13 1 0.13 157 4788 1707 5.904 1 5.904 1 5.904 1 5.905 1 4.955 4.955 1 4.955	591				1					0.211		1							1		
257 7294 0.05	32											1							1		
257 7438 0.166												1							1		15
257 7563 0.958 1 0.958 434 770 4260 0.167 1 0.163 157 12511 978 21.72 1 21.72 1 257 756 0.016 1 0.016 434 770 4260 0.167 1 0.167 157 13160 2891 1.78 1.78 1.78													0.522	157					1		
257 7576 0.016	257											1	0.163	157					1		
812 8255 11.826 4.979 1	257											1							1		15
882	257					0.5	434					1							1		
478 6882 2 64 1 2 64 157 1257 6315 0.136 1 0.136 434 123.157 0.000 123.157 740 6897 3.65 1 3.65 157 1403 4928 4.4 1 4.4 157 5796 1.88 1 1.68 157 3670 2844 0.5 1 0.5 157 578 5881 Facility Bank Subtotal 76.754 7570 7594 1.89 1 1.62 157 1297 3070 2844 0.5 1 0.5 157 5881 Facility Bank Subtotal 76.754 7590 162 1 1 16.2 157 12197 3070 4.242 1 4.242 157 3160 6296 3.42 1 3.42 157 12557 4576 5.5 1 5.5 157 3160 7247 0.906 1 0.906 157 12557 5002 1.07 1 1.07 157 3160 8102 0.7 1 0.7 157 12870 3814 4.94 1 4.94 566 1 1.65 157 10.88 1151 11518 4300 861 13160 5544 1.16 1 1.16 157 1 18 814 1 115.187 4.979 110.188 14416 4.925 16.6 1 1.8 814 1 1.8			11.826	4.979		6 0 4 7	157					1							1		
1	2478		2.64									1			14410	2042					
2071 7884 0.03	2740				1	3.65	157	1403	4928	4.4		1	4.4	157							
3120	3294	6796			1	1.68	157	3670	2844			1	0.5	157			Small Fa	cility Bank	k Subtotal	76.754	
3160 6296 3.42 1 3.42 157 12557 4576 5.5 1 5.5 157	2071				1							1									
3160 7427 0.906					1 1							1 1									
3160 8102 0.7 1 0.7 157 12870 3814 4.94 1 4.94 566	3160				1							1									
115.167 4.979 110.188 14415 4881 16.6 1 1.8 814	3160	8102	0.7			0.7	157	12870	3814	4.94		1	4.94	566							
Small Facility Bank Subtotal 62.555 14416 4925 16.6 1 1.8 814	4991	6481																			
Small Facility Bank Subtotal 62.555 14508 5310 41.08 1 41.08 157			115.167	4.979		110.188															
14628 2508 1.405 1 1.405 796			Small F	ecility Bant	k Subtotal	62 555						1									
1179 3540 32.63 1 32.624 157			o man r	y Dam	. Juniolar	02.000						1									
13131 2816 18.88 1 18.88 157								1179	3540	32.63			32.63	157							
14414 4926 16.6 1 1.8 814 11783 3311 13.334 1 13.334 157 1404 4975 12.2 1 12.2 157 1812 3539 10.875 1 10.875 157 262.220 0.000 199.220																					
11783 3311 13.334 1 13.334 157 1404 4975 12.2 1 12.2 157 1812 3539 10.875 1 10.875 157																					
1404 4975 12.2 1 12.2 157 1812 3539 10.875 1 10.875 157 262.220 0.000 199.220																					
262.220 0.000 199.220								1404	4975	12.2		1	12.2	157							
								1812	3539												
Small Facility Bank Subtatal 186 140										262.220	U.U00		199.220								
										Small F	ecility Banı	k Subtatal	186 140								

Table 4 - Non-Major ERCs used for Delta RACT Deficit

POC					
		On Site		RACT	Revised
Plant No.	Appl. No.	Credit	Decrease Bank No.	Adjustment	Credits
653	6725	10.1		0	10.1
12626	5846	12.1		0	12.1
		22.2			

Total POC:	22.2	RACT Adjusted Total:	22.2

Delta	
POC	Excess
Deficit	Credits
19.029	3.171

Appendix A

Regulation 2-2-423

- **2-2-423 Demonstration of Offset Program Equivalence**: By March 1 of each year, the District shall submit to EPA a demonstration that offsets provided for all new and modified sources within the District, less adjustments to those offsets for federal purposes occurring between credit generation and use, exceed federal offset requirements for new major sources or major modifications at major stationary sources. Adjustment to emission reductions for federal purposes will be required if any of the following occur between the time the credit is generated and the time the credit is used:
 - 423.1 BAAQMD adopts a relevant measure or rule that is required for purposes of federal attainment demonstration requirements.
 - 423.2 A relevant rule or measure is approved into the State Implementation Plan applicable in the BAAQMD:
 - 423.3 EPA promulgates a relevant final rulemaking for either a New Source Performance Standard or a Maximum Achievable Control Technology Standard.

The demonstration shall include:

- 423.4 Emission increases represented by all authorities to construct new major facilities and major modifications at major facilities issued during the three calendar years preceding the demonstration date;
- 423.5 A list of all emission reductions used to offset those emission increases;
- 423.6 The emission baselines that were used to calculate the emission reduction:
- 423.7 The source type, size and category that had generated the emission reduction credit;
- 423.8 All relevant rules that have been adopted or promulgated since the emission reduction had occurred.
- 423.9 Adjustments to emission reduction for federal purposes for all affected projects.
- 423.10 All of the above for as many non-major projects as are needed to demonstrate equivalence.

If the analysis fails to make the required demonstration, the District shall provide sufficient offsets to make up the difference out of the small facility bank. If the small facility bank does not contain the necessary surplus emission reductions, the District shall obtain the necessary surplus emission reductions.

Appendix B

RACT Adjustments of ERCs Provided by Delta

See the following ERC RACT Adjustment Reports for the banking certificates identified above in Table 1.

B657 - El DuPont (B618)

B663 - Courtauld Aerospace (B511)

B664 - Crown, Cork & Seal (B54)

B667 – Continental Can (B85)

B669 - Dexter Hysol Aerospace (B235)

B670 - Homestake Mining Company (587)

B673 - PG&E (B100)

The naming convention of Bxxx – Plant Name (Byyy) is used, where:

Bxxx is the banking certificate number that was used to provide offsets for the major NSR project.

Plant Name is the plant where the emission reductions originally occurred.

Byyy (in parentheses) is the banking certificate number for the original bank deposit of the emission credits.

Appendix C

RACT Adjustments of ERCs from Non-Major Projects

See the following ERC RACT Adjustment Reports for the on-site contemporaneous reductions identified above in Table 4.

On-Site Reductions

ONS653 - Central Marin Sanitation Agency (AN 6725)

ONS12626 - Valero Refining Company (AN 5846)

The naming convention of ONSxxx – Plant Name (AN yyyy) is used, where:

- xxx is the plant number where the credit was used.
- Plant Name is the plant where the emission reductions occurred.
- AN yyyy is the permit application number under which the on-site reductions were used.