Appendix : I Carbon Dioxide Intensity Report

ST MARYS CEMENT INC. (CANADA), ST. MARYS PLANT

ST. MARYS, ONTARIO

Prepared By:

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CONDITION 12 CARBON DIOXIDE INTENSITY REPORT

ECA 6394-D78PR2 Condition 12.1 Carbon Dioxide Intensity Report

The Company shall perform Carbon-Dioxide Emission Intensity testing of the representative samples of the Alternative Low-Carbon Fuels and Conventional Fuels at all times when Source Testing is carried out under Condition 11 of this Approval. Representative samples of the Alternative Low-Carbon Fuels and Conventional Fuels used during the Source Testing events shall be used for performing Carbon-Dioxide Emission Intensity testing. The Carbon-Dioxide Emission Intensity testing shall be carried out in accordance with the requirements set out in O. Reg. 79/15.

1.1 Fuel Sampling

The facility conducted Source Testing between April 8 and 11th, 2025.
The following process ALCF Fuel samples were taken during Source Testing.

Date	Metric Tons AF Consumed (wet)		Sample Taken
	Plastic	Wood	
Tuesday April 8th 2025	53	18	As fed composite
Wednesday April 9th 2025	81	27	As fed composite
Thursday April 10th 2025	112	0	As fed composite
Friday April 11th 2025	112	0	As fed composite

The following process conventional Fuel (i.e. petroleum coke) samples were taken during Source Testing.

Date	Metric Tons Petcoke consumed (dry)	Sample Taken
Monday April 7th 2025	196	Grab Sample
Tuesday April 8th 2025	152	Grab Sample
Wednesday April 9th 2025	112	Grab Sample
Thursday April 10th 2025	116	Grab Sample
Friday April 11th 2025	96	Grab Sample

1.2 Carbon Dioxide Intensity Calculations

Condition 12.2 of the ECA 6394-D78PR2 notes

The Company shall prepare a Carbon-Dioxide Emission Intensity report in respect of the Alternative Low-Carbon Fuels combusted at the site, in accordance with the requirements set out in O. Reg. 79/15, that includes a statement that the Carbon-Dioxide Emission Intensity of the Alternative Low-carbon Fuels are less than the Carbon Dioxide Emission Intensity of the Conventional Fuels in the place of which the Alternative Low-Carbon Fuels are proposed to be combusted.

Carbon dioxide intensity calculation values for all fuels used are shown below:

CO2 Intensity (kg CO2/MJ) = Non-biological Carbon Content (%) × 3.67 kg CO2/kg C ÷ Higher Heating Value (MJ/kg fuel)

Where:

- Non-biological Carbon Content = Total Carbon Content (%) * [100% - Biogenic Carbon Content (%)]
- Total Carbon Content = Result from fuel sample analysis (57.3% for April 8th ALCF Sample)
- Biogenic Carbon Content = Result from plastics carbon testing (23% for April 8th ALCF Sample)
- Higher Heating Value = Value from fuel sample analysis (23.39 for ALCF Sample)

Sample Calculation for April 8th ALCF Sample

CO2 Intensity (kg CO2/MJ) = Non-biological Carbon Content (%) × 3.67 kg CO2/kg C ÷ Higher Heating Value (MJ/kg fuel)

CO2 Intensity (kg CO2/MJ) = Total Carbon Content (%) × [100% - Biogenic Carbon Content (%)] × 3.67 kg CO2/kg C ÷ Higher Heating Value (MJ/kg fuel)

CO2 Intensity (kg CO2/MJ) = 57.3% × (100%-23%) × 3.67 kg CO2/kg C ÷ 23.385 (MJ/kg fuel)

CO2 Intensity (kg CO2/MJ) = 0.069

CO2 Intensity Calculations for ALCF Composite Samples (Consumed During Source Testing)				
	April 8th Alt	April 9th Alt	April 10th Alt	April 11th Alt
Petro Sample No.	8697-8	8697-9	8697-10	8697-11
SGS Sample No.	x	x	X	748460
Biogenic Carbon Content	*23%*	*23%*	*23%*	23%
Total Carbon Content	57.3%	61.46%	63.54%	71.21%
Fuel HHV (MJ/kg)	23.39	28.64	29.05	31.32

CO_2 Intensity (kg CO_2/MJ)	0.069	0.061	0.062	0.064

CO2 Intensity Calculations for Conventional Fuel Samples					
	Petcoke April 7	Petcoke April 8	Petcoke April 9	Petcoke April 10	Petcoke April 11
Petro Sample No.	8697-12	8697-13	8697-14	8697-15	8697-16
SGS Sample No.	x	x	x	x	748461
Biogenic Carbon Content	0%	0%	0%	0%	**0%**
Total Carbon Content	85%	85%	86%	85%	84%
Fuel HHV (MJ/kg)	31.92	32.50	33.33	32.31	32.78
CO2 Intensity (kg CO2/MJ)	0.097	0.096	0.094	0.097	0.094

1.3 Summary

The average ALCF of each Fuel Type used during Source Testing is shown below, indicating that the CO2 intensity of the ALCF daily samples is less than the CO2 intensity of conventional fuels.

	Conventional Fuels (Average)	ALCF Daily Samples (Average)
CO2 Intensity (kg CO2/MJ)	0.0956	0.064

Schedule G.5.4 of the ECA 6394-D78P42 Requires the following:

A summary of all records of the CEM System and CPM System for the parameters specified in Condition 10 of this Approval at the time of Source Testing.

ECA 6394-D78PR2 Condition 10: Continuous Monitoring

10.1. Continuous Emissions Monitoring in the Kiln Stack

10.1.a. The Company shall ensure that the CEM System continuously monitors the following parameters in the exhaust gas stream from the Cement Kiln stack:

i. Nitrogen Oxides
ii. Sulphur Dioxide, and
iii. Opacity

- During Source Testing the following data was recorded on the CEM System

Day	Time	NOx (F) (ppmv)	Opacity (%)	SO2 (F) (ppmv)
8	0:00	234	10.99	275
8	1:00	194	8.65	268.1
8	2:00	233	9.59	288.5
8	3:00	190	9.21	305.6
8	4:00	259	7.19	253.5
8	5:00	115	7.46	335.1
8	6:00	94	2.88	94.7
8	7:00	270	3.47	248.3
8	8:00	162	3.78	253.7
8	9:00	281	3.6	263.4
8	10:00	306	3.15	273.1
8	11:00	235	2.8	257.6
8	12:00	269	3.56	219.1
8	13:00	209	3.1	165.4
8	14:00	213	3.99	175.9
8	15:00	255	4.37	107.9
8	16:00	321	5.13	125.6
8	17:00	388	4.43	203.6
8	18:00	332	3.81	218.3
8	19:00	172	4.14	236.5

8	20:00	57	3.81	324.5
8	21:00	31	4.02	323
8	22:00	7	2.26	17.9
8	23:00	254	6.5	266.9
9	0:00	255	3.74	330.5
9	1:00	97	3.23	113.3
9	2:00	277	4.04	135.7
9	3:00	200	3.79	139.5
9	4:00	258	3.98	139.9
9	5:00	114	4.52	169.1
9	6:00	236	4.2	126.8
9	7:00	117	4.48	129.8
9	8:00	328	4.86	107.6
9	9:00	348	4.59	136.6
9	10:00	317	4.25	165.4
9	11:00	176	3.77	230.4
9	12:00	179	3.68	256.4
9	13:00	232	3.34	327.3
9	14:00	130	3.18	301.8
9	15:00	256	3.35	240.6
9	16:00	411	3.85	197.1
9	17:00	350	3.94	197.8
9	18:00	226	4.64	228.7
9	19:00	196	5.1	231.1
9	20:00	212	5.17	316.2
9	21:00	215	4.34	314.6
9	22:00	83	3.13	326
9	23:00	135	3.1	292.8
10	0:00	156	3.42	305.7
10	1:00	164	3.17	231.2
10	2:00	197	3.01	334
10	3:00	92	3.15	295.8
10	4:00	159	3.06	333.9
10	5:00	138	4.11	317.7
10	6:00	125	5.26	215.9
10	7:00	296	5.18	226.2
10	8:00	208	5.34	239.1
10	9:00	164	5.44	240.2
10	10:00	198	5.45	243.9
10	11:00	280	5.86	212.4

10	12:00	289	5.31	218.4
10	13:00	275	5.6	140
10	14:00	319	5.15	170.1
10	15:00	535	4.93	167.6
10	16:00	699	4.24	167.2
10	17:00	634	4.12	156.9
10	18:00	590	4.31	156.1
10	19:00	378	3.67	227.4
10	20:00	315	3.4	266.1
10	21:00	197	3.29	327.3
10	22:00	172	3.29	302.9
10	23:00	150	3.38	328.2
11	0:00	160	4.14	314.3
11	1:00	204	4.05	315.9
11	2:00	99	4.27	308.9
11	3:00	102	3.72	318.9
11	4:00	268	3.96	250.4
11	5:00	272	3.25	327.8
11	6:00	312	3.32	290.9
11	7:00	351	3.23	304.5
11	8:00	111	3.04	314.2
11	9:00	211	3.06	350
11	10:00	261	2.9	264.2
11	11:00	234	2.91	337
11	12:00	261	2.76	314.3
11	13:00	341	2.79	270.3
11	14:00	359	3.08	302.7
11	15:00	342	3.09	233.1
11	16:00	180	3.39	243.6
11	17:00	278	3.26	194.7
11	18:00	350	3.3	158.1
11	19:00	365	3.36	143.8
11	20:00	382	3.56	119.3
11	21:00	372	3.4	151.2
11	22:00	460	3.26	187.1
11	23:00	319	3.4	208.4

10.1.b. The CEM System for nitrogen oxides and sulphur dioxide shall be installed, operated, maintained and quality assurance conducted and reported in accordance with the requirements set out in Report EPS1/PG/7. The annual Relative Accuracy Test Audit (RATA) report, including the required production data during the testing shall be submitted to the Manager and District Manager by June 30 of each year, for the previous calendar year. The quarterly cylinder gas audit reports shall be made available to the Ministry upon request.

- The CEM System complies with the requirements set out in EPS 1/PG/7, renamed ECS 32102. The system was audited in February 2025 and determined to meet the standard.

10.1.c. The CEM System for monitoring opacity shall comply with the requirements outlined in Schedule E.

- The CEM System complies with the requirements set out in EPS 1/PG/7, renamed ECS 32102. The system was audited in February 2025 and determined to meet the standard.

10.2. Continuous Monitoring of Process Conditions

a. The Company shall install, operate and maintain a CPM System to continuously monitor:

i. residual oxygen at locations specified in Schedule F;

- Schedule F notes Residual oxygen at Stage 1 of the preheat tower where the residual oxygen meets a minimum of 1%.

ii. carbon monoxide in the preheater tower;

iii. temperature of gases in the preheater tower, as specified in Schedule iii. F and correspond with a retention time of not less than 10 seconds;

- Schedule F Notes: Primary- temperature of gas leaving the kiln reaching a minimum of 1000 Deg C or Secondary - the temperature of the gases at Stage 4 of the preheater tower where the gas temperature reaches a minimum of 750 Deg C.

iv. pressure at locations specified in Schedule F; and,

- Schedule F notes pressure in the Kiln, Preheater tower, and Raw Mill must be operated under negative pressure at all times.

v. Total Hydrocarbon (as methane) in the gases leaving the Cement Kiln stack.

Date	Stage 1 O2 – East (%)	Stage 1 O2 – West (%)	CO Stage 1 East (ppm)	CO Stage 1 West (ppm)	Riser Temp (°c)	Burner Temp (°c)	Pressure – Riser (WC)	Pressure - Kiln Hood (WC)	Pressure - Raw Mill (WC)
08-Apr-25 00:00:00	6.7	4.2	2204.8	5095.1	833.4	1251.5	-15.7	-3.2	-4.6
08-Apr-25 01:00:00	6.4	4.1	2800.1	5488.2	834.7	1246.4	-18.3	-3.0	-3.7

08-Apr-25 02:00:00	6.5	4.2	2903.0	5281.1	833.9	1198.2	-24.0	-3.1	4.8
08-Apr-25 03:00:00	6.4	4.7	2662.5	5118.6	832.9	1205.9	-24.1	-3.2	16.8
08-Apr-25 04:00:00	6.4	4.3	2130.2	4401.4	831.2	1226.4	-21.9	-2.9	-12.4
08-Apr-25 05:00:00	5.8	4.2	4108.2	6078.3	838.7	1238.6	-21.0	-3.0	-5.4
08-Apr-25 06:00:00	6.2	4.8	5539.8	5834.8	834.7	1051.3	-10.8	-3.2	-40.7
08-Apr-25 07:00:00	7.2	4.7	1780.3	3636.4	827.2	1196.1	-2.8	-2.9	-30.2
08-Apr-25 08:00:00	7.9	4.9	1724.3	3800.0	826.8	1148.1	-4.1	-3.1	-18.5
08-Apr-25 09:00:00	7.7	4.8	1564.7	3311.5	829.0	1120.5	-5.1	-3.0	-24.3
08-Apr-25 10:00:00	7.3	4.2	1600.6	3769.2	831.0	1082.4	-5.7	-3.0	-13.6
08-Apr-25 11:00:00	7.9	4.4	1461.6	3612.6	830.0	1267.7	-6.4	-3.1	-19.4
08-Apr-25 12:00:00	8.4	4.6	1330.8	3096.1	823.2	1255.5	-7.2	-3.0	-42.7
08-Apr-25 13:00:00	8.7	5.0	1536.2	3255.4	824.4	1228.5	-19.9	-2.9	-56.3
08-Apr-25 14:00:00	8.4	5.2	1528.5	3010.6	826.0	1175.8	-32.0	-3.2	-16.1
08-Apr-25 15:00:00	8.7	6.1	1651.8	2912.9	819.3	1204.8	-34.9	-3.1	-3.0
08-Apr-25 16:00:00	8.3	5.9	1582.1	2867.9	821.8	1212.5	-32.6	-3.1	-3.7
08-Apr-25 17:00:00	7.2	4.6	1680.1	3209.5	825.9	1219.5	-34.1	-3.0	-6.1
08-Apr-25 18:00:00	7.1	4.8	1827.4	3695.3	829.3	1275.2	-37.1	-3.0	-8.8
08-Apr-25 19:00:00	7.0	4.9	2206.1	4574.2	830.0	1226.8	-41.3	-3.0	-7.5
08-Apr-25 20:00:00	5.7	4.4	4690.4	6743.3	838.5	1249.3	-37.1	-3.0	-15.9
08-Apr-25 21:00:00	4.8	3.8	5352.1	7375.7	843.9	1249.2	-29.6	-3.2	-26.0
08-Apr-25 22:00:00	4.4	3.8	6770.7	7993.9	842.7	1313.4	-17.4	-3.0	-38.8
08-Apr-25 23:00:00	5.7	4.1	2658.8	4159.0	832.5	1313.5	-7.5	-3.3	-15.6
09-Apr-25 00:00:00	5.5	3.9	2288.9	4528.4	835.5	1280.2	-1.2	-2.8	-9.5
09-Apr-25 01:00:00	5.4	4.5	3931.4	5749.0	840.7	1061.3	-15.5	-2.6	-34.2
09-Apr-25 02:00:00	7.0	5.1	1520.4	2962.4	828.0	938.6	-19.7	-3.0	-40.1
09-Apr-25 03:00:00	7.3	5.0	1510.1	3495.2	828.1	996.6	-20.9	-3.1	-39.0
09-Apr-25 04:00:00	7.8	5.0	1466.7	2952.4	827.2	1145.5	-21.6	-3.0	-42.8
09-Apr-25 05:00:00	7.7	5.0	1576.8	4192.3	829.2	1165.4	-24.1	-3.1	-38.5
09-Apr-25 06:00:00	7.9	5.7	1514.5	2889.6	826.0	1158.1	-23.5	-3.1	-45.6
09-Apr-25 07:00:00	8.0	5.9	1540.7	3597.0	823.3	1119.6	-26.3	-3.0	-42.8
09-Apr-25 08:00:00	8.1	5.7	1366.2	2573.5	820.8	1085.6	-25.4	-3.1	-42.5
09-Apr-25 09:00:00	7.9	5.6	1405.4	2578.6	825.0	1210.4	-25.5	-3.0	-42.1
09-Apr-25 10:00:00	7.6	5.6	1518.6	2696.9	825.1	1233.4	-13.7	-3.0	-37.4
09-Apr-25 11:00:00	6.7	4.9	2008.5	4210.4	826.8	1212.8	-4.1	-3.1	-37.6
09-Apr-25 12:00:00	6.1	4.4	2188.2	4788.4	828.2	1196.2	-4.4	-3.0	-39.1
09-Apr-25 13:00:00	5.6	4.1	2173.7	4911.6	831.5	1264.6	-14.7	-3.0	-35.9
09-Apr-25 14:00:00	5.3	4.0	2339.9	5105.6	835.5	1253.1	-19.9	-3.3	-23.8
09-Apr-25 15:00:00	6.1	4.9	1751.1	3833.5	829.8	1195.5	-21.1	-3.0	-35.0
09-Apr-25 16:00:00	7.1	5.8	1456.9	2832.2	822.9	1227.6	-24.4	-3.0	-24.2
09-Apr-25 17:00:00	7.3	5.7	1483.5	3190.5	824.7	1225.5	-25.0	-3.0	-15.9

09-Apr-25 18:00:00	7.1	5.7	1595.1	3753.3	826.6	1189.2	-25.9	-3.0	-7.0
09-Apr-25 19:00:00	6.3	5.0	1821.8	4396.8	826.5	1135.6	-26.4	-3.0	-6.7
09-Apr-25 20:00:00	6.1	4.1	2032.6	4941.0	832.3	1186.1	-23.1	-3.0	2.2
09-Apr-25 21:00:00	6.4	4.2	2226.7	5269.0	831.5	1217.3	-20.5	-3.1	8.9
09-Apr-25 22:00:00	5.9	4.3	3689.2	6507.1	836.5	1201.9	-11.6	-3.1	-23.1
09-Apr-25 23:00:00	6.1	4.5	2312.2	5389.4	833.7	1211.0	-0.6	-3.0	-21.0
10-Apr-25 00:00:00	6.6	5.2	2386.4	4649.8	831.2	1213.9	0.0	-3.2	-19.5
10-Apr-25 01:00:00	5.6	4.0	3455.7	5325.7	832.2	1222.0	-0.3	-3.1	-22.5
10-Apr-25 02:00:00	6.3	4.3	2250.8	4672.3	833.0	1236.2	-3.9	-2.9	-15.9
10-Apr-25 03:00:00	6.4	4.6	2937.0	5639.0	838.2	1138.8	-17.0	-3.0	-12.1
10-Apr-25 04:00:00	7.2	4.7	2164.3	4960.1	834.5	1179.3	-16.7	-2.9	-10.5
10-Apr-25 05:00:00	8.0	5.2	2063.7	4885.6	833.1	1176.5	-19.1	-3.1	-43.3
10-Apr-25 06:00:00	7.0	5.1	2041.1	4881.9	830.0	1098.2	-17.8	-3.1	-0.1
10-Apr-25 07:00:00	6.7	5.0	1802.6	3809.8	826.1	1163.8	-16.3	-3.0	-11.3
10-Apr-25 08:00:00	6.5	4.9	1924.4	4155.5	828.4	1193.6	-21.0	-3.1	-8.9
10-Apr-25 09:00:00	6.0	4.7	2144.8	4765.9	830.5	1158.4	-22.4	-3.1	-6.9
10-Apr-25 10:00:00	6.2	4.9	2208.3	4671.3	829.5	1147.8	-22.3	-3.0	-0.6
10-Apr-25 11:00:00	6.2	5.0	1897.4	4042.0	827.7	1161.1	-22.0	-3.0	-17.0
10-Apr-25 12:00:00	6.3	5.1	1893.8	4143.9	830.0	1179.9	-20.7	-3.1	-24.3
10-Apr-25 13:00:00	6.9	5.7	1977.5	4062.8	829.1	1236.2	-14.7	-3.0	-37.2
10-Apr-25 14:00:00	6.2	4.7	1812.3	3715.8	824.4	1040.4	-16.8	-3.2	-30.3
10-Apr-25 15:00:00	7.0	5.0	1455.1	2970.4	823.8	1248.7	-10.1	-3.0	-6.4
10-Apr-25 16:00:00	6.8	5.0	1415.1	3191.1	823.6	1297.8	-0.9	-2.9	-12.2
10-Apr-25 17:00:00	6.8	5.1	1521.7	3459.7	821.3	1317.1	0.0	-2.9	-9.5
10-Apr-25 18:00:00	7.0	5.6	1560.8	3174.2	819.1	1278.7	0.0	-3.1	-8.9
10-Apr-25 19:00:00	6.4	4.9	1862.9	4236.0	820.3	1279.3	0.0	-3.0	-30.3
10-Apr-25 20:00:00	5.9	4.7	1951.5	4665.6	822.4	1284.1	0.0	-3.0	-37.1
10-Apr-25 21:00:00	5.5	4.5	2453.5	5267.1	824.9	1251.5	0.0	-2.9	-35.2
10-Apr-25 22:00:00	5.8	5.3	2538.3	5095.3	820.6	1219.6	0.0	-3.2	-40.4
10-Apr-25 23:00:00	5.3	4.4	2731.8	5530.1	817.6	1200.7	0.0	-3.0	-39.0
11-Apr-25 00:00:00	5.3	4.6	2865.5	5190.5	812.5	1211.5	0.0	-2.9	-36.8
11-Apr-25 01:00:00	5.6	4.6	2396.5	5199.7	816.2	1228.7	-0.3	-3.0	-42.3
11-Apr-25 02:00:00	5.3	4.6	2507.6	5742.0	816.3	1188.0	-9.3	-3.1	-28.5
11-Apr-25 03:00:00	5.3	4.7	2762.9	5899.3	816.6	1161.3	-6.9	-3.0	-39.6
11-Apr-25 04:00:00	5.5	4.1	1932.8	4836.5	794.6	1034.2	-3.2	-3.2	-43.5
11-Apr-25 05:00:00	5.4	4.0	2073.7	5041.6	806.0	1232.5	-0.3	-3.0	-35.6
11-Apr-25 06:00:00	5.7	4.6	1964.2	4502.9	816.8	1233.7	-0.4	-3.1	-30.6
11-Apr-25 07:00:00	6.2	5.2	1750.2	3859.0	812.2	1229.9	-4.4	-2.9	-40.9
11-Apr-25 08:00:00	5.5	4.9	2407.0	5058.1	819.1	1109.4	-12.9	-3.1	-32.0
11-Apr-25 09:00:00	5.7	4.5	2042.4	4552.2	805.8	1105.0	-3.6	-3.0	-38.5

11-Apr-25 10:00:00	5.7	4.7	2027.9	4374.6	798.9	1211.0	-14.6	-3.1	-38.1
11-Apr-25 11:00:00	5.8	4.2	2259.8	4811.4	799.4	1205.8	-14.2	-3.0	-33.8
11-Apr-25 12:00:00	6.1	4.1	2240.1	4866.5	799.1	1238.3	-9.2	-3.1	-11.0
11-Apr-25 13:00:00	6.4	4.7	1990.1	4341.2	800.6	1255.1	-8.3	-3.1	-22.0
11-Apr-25 14:00:00	6.6	5.3	1620.6	3819.3	801.2	1112.2	-18.3	-3.1	-24.3
11-Apr-25 15:00:00	7.0	5.9	1588.4	3270.9	796.9	1223.6	-5.6	-3.1	-54.6
11-Apr-25 16:00:00	6.3	5.5	1712.2	4499.4	795.2	1200.5	-11.0	-3.1	-55.0
11-Apr-25 17:00:00	6.4	5.6	1666.8	3705.6	793.6	1236.3	-23.8	-3.1	-52.4
11-Apr-25 18:00:00	5.0	5.6	1573.1	2419.0	790.8	1237.4	-6.1	-3.1	-50.6
11-Apr-25 19:00:00	7.1	5.9	1527.2	2972.6	787.6	1254.2	-23.5	-3.1	-57.4
11-Apr-25 20:00:00	7.1	6.1	1480.2	2628.6	773.7	1203.0	-25.0	-3.1	-39.6
11-Apr-25 21:00:00	6.3	5.4	1569.7	3034.1	763.9	1264.8	-24.3	-3.0	-41.7
11-Apr-25 22:00:00	6.8	5.5	1597.8	3109.3	765.3	1321.2	-17.0	-2.8	-44.9
11-Apr-25 23:00:00	5.8	4.8	1916.3	3844.0	770.2	1133.7	-14.2	-3.2	-53.5

The facility's THC monitor was not working during the Source Testing however the Source Testing Report from RWDI Contained THC Data during the source testing period.

b. The CPM System specified in condition 10.2.a shall be designed, operated and maintained in accordance with an approved continuous monitoring plan, complete with specifications based on manufacturer's specifications and manuals. In this regard, the continuous monitoring plan shall be revised to assure proper calibration, maintenance and operation of the CPM System, in order to establish its performance on a continuous basis. The revised continuous monitoring plan shall be provided to the Manager for approval three (3) months prior to the implementation of the Alternative Low-Carbon Fuels operation at the Facility.

- The Facility submitted the CPM to the MECP on December 13, 2023.