

Attachment 10A

EPA's Document on Short Term Limits

The Link to EPA's short term limit document is: <https://www.regulations.gov/document?D=EPA-HQ-OAR-2018-0295-0171>

EPA's conclusion is as follows:

"Consequently, EPA finds that units are consistently operating their SCRs throughout the season. The rare hours when the SCRs are turned down or off are usually associated with periods of low generation, most likely not occurring during peak ozone formation times in the afternoon hours. Stakeholders have asserted that engineering challenges of operating controls at low utilization, such as fouling and minimum operating temperature constraints, may drive some of this behavior."