

# EHS&R Newsletter

SECOND QUARTER 2024



## Parkway 5-Year Safety Milestone



In May, Parkway Generation, a portfolio of power generation facilities that CAMS operates, celebrated five years without an OSHA-recordable injury. CAMS marked the achievement with a special event that included individuals representing the facility and union staff, Parkway management, and the Parkway Line of Business Safety Council.

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“Ensuring the health and safety of our employees and communities is of the utmost importance for CAMS. This important milestone demonstrates that safety, as a value, is deeply ingrained in the people and processes that make up the Parkway Generation facilities.”

**Ben Vodila - VP of Health & Safety**

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## 2024 Annual Compliance Summit

By Sarah Jacobs, Environmental Associate

More than 130 CAMS employees, including Environmental, Health, Safety, and Regulatory leaders across CAMS' nation-wide industrial fleet and CAMS' corporate offices joined forces in Houston for the 6th Annual CAMS Compliance Summit from June 4 through 6. The first day began with a motivational introduction from our founder, Joe Sutton, and featured key NERC updates. Additionally, a Safety Managers Workshop enabled plant representatives and CAMS corporate employees to collaborate and discuss emerging topics and lessons learned. Attendees ended the day with a social at Putt Shack to network in a casual environment.

Day two consisted of Environmental updates, ROC tours, and a community Blood Drive. The Environmental team led informational presentations and an excellent interactive exercise to spark conversations about potential incidents and response plans. Throughout the day, attendees had the opportunity to donate blood with and tour the CAMS Remote Operations Center (ROC). Thanks to Yulia Furikova and Lina Sylejmani, the CAMS community provided 33 successful blood donations!

The final day of the summit showcased technical safety updates from the Health & Safety team. Additionally, EHS Excellence Awards were presented to Brad Keaton, Plant Manager of Lincoln Generating Facility and the staff at Keys Energy Center (See Page 11 for more information).

Presentations from the Human Resources team, an interactive quiz on new safety software, and excellent incident preparation discussions, ended the week on a great note.

We are excited to plan next year's Summit!



Attendees bonding at Putt Shack



Emily Orlando speaking at the 2024 EHS&R Compliance Summit



"The conference was well organized and engaged participants with interactive workshops and insightful presentations. It was such a joy to see colleagues from different departments and across the country come together to collaborate and share knowledge and ideas."

**Emily Orlando**  
Senior Environmental Associate

## Three Rivers Energy Center Donates to Community Group



Pictured from left to right: Patrick Chmielewski (Maintenance Manager), Paul Gregor (Plant Manager), Christopher Harseim (Chief of Police), Jael Waddick (Business Manager), Brian Delcorio (Plant Engineer), and Michael Korolenko (Operations Manager)



The Competitive Power Ventures (CPV) Three Rivers Energy Center is an active supporter of the local community. Each year, the team at this CAMS-operated facility donates an item for the Grundy County Law Enforcement Managers Association Fundraiser. This year, the CAMS team provided a Traeger Pro wood pellet grill that was raffled off as the first prize for the event.

To show their appreciation, Christopher Harseim, Chief of Police for Coal City Illinois Police Department, stopped by the plant for an in-person thank you and photo opportunity.

In the background is one of the two units at the Three Rivers Energy Center. The Grundy County Law Enforcement Managers Association is an organization of leaders in the law enforcement, fire service, medical, and emergency management fields.



## Halogen Bulb Replacement: A Bright Idea for Energy Conservation

By Lucian Hill, Director, Environmental Services



The push for sustainability initiatives has propelled the transition from traditional halogen bulbs to more energy-efficient alternatives. This shift not only benefits the environment but also aligns with CAMS corporate goals. Parkway Generation Peaking Plants (consisting of peaking plants at Burlington Generating Station, Kearny Generating Station, and Linden Generating Station) are swapping out their old halogen bulbs for light-emitting diode (LED) bulbs.

The Parkway Generation Peaking Plants have embarked on a comprehensive transition from Halogen bulbs to LED bulbs, a process that has been underway for over a year. This initiative is not merely a one-time event, but an ongoing endeavor aimed at enhancing energy efficiency and reducing environmental impact. Across the entirety of the facilities, from administration buildings to critical process

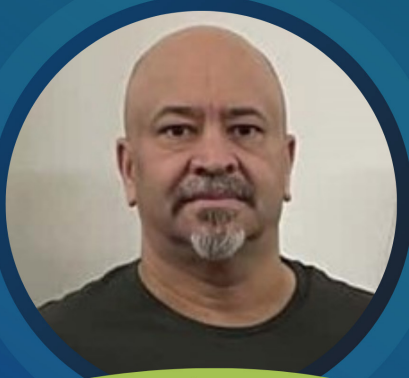
areas, the replacement of traditional lighting with LED technology is being systematically implemented. Each phase of this transformation is meticulously coordinated by individual plant project teams, ensuring a seamless integration of LED lighting solutions into the existing infrastructure. Thus, the projects are unfolding in a modular fashion, with each part contributing to the overall sustainability goals of the Parkway Generation Peaking Facilities.

Replacing halogen bulbs with LED or compact fluorescent lamps (“CFLs”) presents a myriad of advantages, including energy efficiency and reduced operational costs. Additionally, the extended lifespan of LED and CFL bulbs reduces the frequency of replacements, minimizing landfill waste and conserving resources. This resonates with social responsibility efforts by promoting sustainable consumption patterns and minimizing environmental harm. Additionally, the transition to energy-efficient lighting solutions may enhance workplace safety and employee well-being. LEDs produce less heat, reducing the risk of fire hazards and creating a safer working environment.

In conclusion, The Parkway Plants’ transition from halogen bulbs to energy-efficient alternatives embodies the principles of environmental stewardship, social responsibility, and effective governance.

## EHS Excellence Awards

# *Congratulations!*



*Brad Keaton*

Lincoln Generating  
Facility

### Brad Keaton: Outstanding Safety Achievement

Brad Keaton is the Plant Manager at the Lincoln Generating Facility, an OSHA Voluntary Protection Program (VPP) site. Brad, along with his team, led Lincoln during a successful OSHA VPP recertification audit in November 2023.

Brad displays the core tenants of our CAMS EHS Vision: effectively managing risk, challenging habits and biases, and relentless pursuit of excellence. He consistently implements proactive safety measures and promotes employee engagement.

# *Congratulations!*



*Keys Energy Center*

### Keys Energy Center: Sustained Environmental Excellence

Environmental Excellence is a team sport at the Keys Energy Center in Brandywine, Maryland. As a result, the entire staff is recognized for their relentless pursuit of environmental excellence.

Notable achievements including the construction of a new state of the art waste storage building, a plant-wide switch to more energy-efficient LED bulbs, a plant-wide color coordinated drain system, a Five-Year Gold Award from the local water regulatory agency, WSSC, for no violations, and consistent community volunteer activities at the Cedarville State Forest.

For information on how to nominate an individual or group for an EHS Excellence Award, send an email to [safety@camstex.com](mailto:safety@camstex.com).

## GADS Updates

By Jalen Tarvin, NERC Associate



Site owners and site operators of power generation facilities are constantly looking for ways to improve reliability and availability, as these two things are vital to the success of a power generation plant. Numerous reports are developed to track the various metrics that makeup reliability and availability. For power generation facilities, historical reliability and availability data can be obtained from their Generating Availability Data System (GADS) reports. Although originally introduced to the power industry in the 1960s, GADS did not become a mandatory power industry program until January 1, 2013. Conventional generating units 20 MW and larger became required to report data quarterly in the form of event data, performance data, and design data.

Event data addresses operating status and capability changes. Events typically come in the form of outages or out of service time. For example, if a site has a forced outage or maintenance outage, the site must report the total time of that event and specify what led to the event. The total hours per month of each event type are summarized in the site's performance data report. The performance data will show the total hours of in-service time and how it relates to the total hours that the site was in a forced outage, maintenance outage, reserve shutdown, etc. These reports must be submitted to the Web E-GADS OATI portal quarterly. In addition to the quarterly submittals, GADS requires annual verification of design data. Design data addresses unit type characteristics and their unique ID numbers. The ID number of a gas turbine differs from the ID number of a fossil steam turbine, and this is consistent for the different fuel types of generating unit compositions.

On August 15, 2024, changes to event data reporting and design data reporting will go into effect. The event reporting changes are aimed at addressing weather-related events and events related to cyber incidents. These changes support NERC's rollout of the new Cold Weather preparedness standard EOP-012 coming October 1, 2024. NERC's changes to design data will allow the industry to more accurately identify unit characteristics as they relate to fuel type and composition. Because of these changes, the 2024 Q1 deadline was moved to August 15, 2024, which is the same deadline for 2024 Q2 data.

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## GADS Updates (cont.)

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### Changes to Event Data Reporting:

- Contributing Operating Condition - event data reporting will now include a field for stating condition contributing to the event being reported. NERC is aiming to track events that are the result of hurricanes, intense cold, or similar events. It is expected that under normal operating conditions that generating units will report "No contributing condition".
- Cause Codes - new causes codes have been added to address physical security incidents and cyber security incidents.

### Changes to Design Data Reporting:

- NERC has issued a Design Data spreadsheet inclusive of new design data requirements that were originally voluntary. This spreadsheet is to be populated and uploaded to the OATI portal for all applicable generating units. The newly added design data addresses unit specific fuel types, characteristics, and associated identification numbers.

New changes are also coming on August 15, 2024 for Renewable GADS. For Wind generating units with a total installed capacity of 75 MW and larger, GADS reporting is being moved to the OATI portal. Wind GADS was originally reported to its own portal separate from the Conventional GADS OATI portal, but for all 2024 Winds GADS data, reporting will be done in the OATI portal. This change comes approximately 6 years after Wind GADS first became mandatory for Total Installed Capacities 200 MW or larger in 2018. Another change coming August 2024 is the addition of event reporting similar to Conventional GADS. Prior to this change, Wind GADS only contained data in the form of turbine hours. The turbine hours were tracked in different categories such as forced outage, planned outage, and monthly availability but it was not required to report the event type or the duration of the individual events. Now, Wind GADS requires the applicable generating units to report event data in the same fashion as Conventional GADS.

The renewables GADS will be seeing a new addition as Solar generating units of 100 MW and larger are required to report GADS for 2024. The first reporting deadline for 2024 Q1 and Q2 data is August 15, 2024 and the reporting will be done in the OATI portal, same as Conventional and Wind GADS. The reporting of event data, performance data and design data follows a similar structure as Conventional and Wind GADS.

GADS reporting has allowed the power industry to document operating data going back to the 1960s and it remains a pivotal component of maintaining reliability and availability at generating facilities. For site owners and site operators, it will be important that their processes are updated to meet these new changes to GADS. These changes will need to be coordinated with any third-party GADS vendor and coordinated with any reports sent to Regional Entities. The CAMS NERC team will be working closely with each site to ensure these changes are implemented.



## Employee Spotlight: Mike Iovino - Dedicated Professional Serving Veterans



In the fast-paced world of power plant operations, ensuring regulatory compliance is no small feat. However, for Mike Iovino, who leads the NERC CIP compliance program for the New Haven, Middletown, GenConn and Oswego power plants, this is just another day at the office. Known for his relentless work ethic and meticulous attention to detail, Mike plays a pivotal role in keeping our power plants running smoothly and within legal guidelines.

But Mike's dedication extends far beyond the workplace. Mike is a licensed fishing guide in the State of Connecticut and every year, he volunteers as a boat captain to support a cause close to his heart – the local veteran fishing tournament. This annual event, designed to aid veterans, is more than just a competition; it's a symbol of community spirit and solidarity.



The event is sponsored by Gaylord Hospital Sports Association, which provides adaptive sports opportunities for individuals with physical disabilities, the Major Steven Roy Andrews Fishing Outreach Program, which offers therapeutic fishing experiences for veterans and their families, and Connecticut BASS Nation. Each veteran is paired with an experienced angler and boat captain and all fishing equipment is provided.

This year, Mike teamed up with a Mike Kelsey, a Marine veteran who served two tours in Iraq and suffered a traumatic brain injury and other injuries when his platoon was bombed. Fishing with Mike in the tournament was therapy for Kelsey, allowing him to forget about his injuries and trauma during a day of fun and camaraderie. Their shared commitment and seamless teamwork culminated in an impressive victory. Together, they caught a total of



## Employee Spotlight: Mike Iovino - Dedicated Professional Serving Veterans

five fish weighing an outstanding 20.07 pounds, securing their place at the top of the leaderboard. The fish were released alive and well to be caught another day and Mike donated a guided fishing trip that was awarded to one of the Veterans at the conclusion of the event.

Mike's dual commitment to his professional responsibilities and his community exemplifies the values we hold dear at our company. His hard work ensures that our operations remain compliant and efficient, while his volunteer efforts bring joy and support to veterans who have served our nation. We are incredibly proud to have Mike as part of our team and grateful for the positive impact he makes both at work and in the community.



### Hiring of veterans:

As a veteran-led company, CAMS is committed to supporting and providing opportunities for former members of the armed forces. In fact, veterans comprise over 13% of our workforce. We recognize their unrivalled experience, skills, and leadership abilities and appreciate their immense contributions to delivering creative solutions to our clients.

### Matching Gift Program

CAMS has a responsibility to support our employees and give back to the community. Our charitable matching gift program encourages employees to donate to local 501(c)(3) nonprofit organizations. This program amplifies the impact of employee donations and positively impacts the communities where CAMS employees live and work.



## Parkway Facilities Participate in Environmental Justice Rule Process

By Lucian Hill, Director, Environmental Services



The New Jersey Department of Environmental Protection (“NJDEP”) enacted the AO-2021-25 Environmental Justice (“EJ”) Rule in 2021 to ensure that vulnerable communities, often disproportionately affected by pollution and industrial activities, have a greater say in decision-making processes that may impact their health and well-being.

Three Parkway Generation facilities recently completed the AO-2021-25 review process in the first quarter of 2024: Bergen Generating Station, Kearny Generating Station, and Linden Generating Station. All three facilities triggered this process as part of the standard five-year major source Title V air permit renewal process, and the fact that they are all located in NJDEP-identified EJ areas.

At its core, the rule requires facilities seeking permits to undergo a rigorous EJ analysis. This analysis evaluates potential environmental and public health impacts on overburdened communities, typically consisting of low-income, minority, and marginalized populations. By mandating this assessment, the rule empowers communities to voice concerns and advocates for measures to mitigate adverse effects. The facilities participated in the EJ process by hosting a public meeting, posting notices in the local newspapers and community centers, and receiving and responding to comments from the public in concert with the NJDEP EJ office.

Furthermore, the AO-2021-25 EJ Rule promotes transparency and public engagement by facilitating meaningful dialogue between regulators, industries, and affected communities. It strengthens procedural protections, ensuring that environmental justice considerations are integrated into permit evaluations and decision-making procedures.

This groundbreaking initiative underscores New Jersey’s commitment to rectifying historical environmental inequities and fostering sustainable development that prioritizes human health and social justice. The rule, which centers on the principles of fairness, inclusivity, and accountability, sets a precedent for other states grappling with similar challenges.

However, while the AO-2021-25 EJ Rule represents a significant milestone, its successful implementation hinges on robust enforcement mechanisms, adequate resources, and continued stakeholder collaboration. Only through sustained efforts can New Jersey truly achieve its vision of an environmentally just and equitable future for all its residents.

In addition to New Jersey, CAMS is also tracking and actively supporting Power Plant air permits triggered by similar environmental justice laws and regulations in other states such as California, Maryland, New York, Colorado, Connecticut, Illinois, Michigan, Washington, and Massachusetts.

## EPA Finalizes Greenhouse Gas Rules for Power Plants

By Derek Furstenwerth, SVP, Environmental Services



On May 9, 2024, the United States Environmental Protection Agency (“EPA”) published its final greenhouse gas (“GHG”) regulation for power plants (“Power Plant GHG Rule”) in the *Federal Register*. This rule became effective on July 8, 2024. The final Power Plant GHG Rule was released as part of a suite of final rules applying to power plants. The other rules address updates to the Mercury and Air Toxics Standards (“MATS”), limitations on wastewater from coal-fired power plants, and coal ash disposal requirements. Key provisions of the new GHG rule are:

- It applies to:
  - Existing coal, gas, and oil-fired power plant *boilers*
  - New and reconstructed<sup>1</sup> *natural gas-fired combustion turbines* (“CTs”)
- It *does not* apply to modified<sup>2</sup> or existing CTs

The standards in the final Power Plant GHG rule are based on the best system of emission reductions (“BSER”) for each category of affected sources. BSER provides the technological basis for the emission standards, from which a numerical emission standard is calculated. Affected sources are required to meet the emission standard but are not required to employ the specific controls identified in BSER.

The standards are described below, with CT standards first and standards applicable to boiler-based power plants to follow.

### New Source Performance Standards (“NSPS”) – New and Reconstructed Combustion Turbines (Subpart TTTT)

The rules apply to any CT greater than 25 megawatts (“MW”) that produces electricity for sale to the grid and was constructed or reconstructed after May 23, 2023. Modified units are not subject to the rule.

<sup>1</sup> Reconstructed units are those for which extensive component replacements have been performed totaling 50% or more of the capital cost of new equipment.

<sup>2</sup> For the purpose of this standard, a modification is an equipment or process change that increases maximum capacity.

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## EPA Finalizes Greenhouse Gas Rules for Power Plants (cont.)

The key change in the final Power Plant GHG rule compared to the proposal is the exclusion of existing CTs from the final rule. EPA has indicated an intent to regulate existing CTs in the future. These future regulations will address emissions from pollutants like nitrogen oxides (“NOx”), hazardous air pollutants (“HAPs”), and GHG. The final rule is less complicated than the proposal, with BSER now consisting of a combination of good operations and maintenance (“O&M”) practices, high-efficiency generating equipment, clean fuels (i.e., distillate oil or natural gas), and carbon capture and storage (“CCS”), depending on unit characteristics. EPA removed options involving low-GHG hydrogen co-firing from BSER, noting that it is not demonstrated in practice at sufficient scale. The standards are set in two phases, as proposed, the first of which takes effect on July 8, 2024, but compliance date for Phase II has been moved up from 2035 in the proposal to 2032. Phase I limits, applicable immediately, are based on a combination of high-efficiency generating equipment, good O&M practices, and clean fuels. In Phase II, units with a capacity factor (“CF”) of 40% or higher are required to meet a standard based on 90% CCS.

Most of the standards are expressed in pounds of carbon dioxide (“CO<sub>2</sub>”) emitted per gross megawatt-hour (“MWh”) of electricity produced (“lb CO<sub>2</sub>/MWh-g”). Compliance with these standards is evaluated on a rolling 12-operating month basis. An operating month is “a calendar month during which any fuel is combusted ... at any time.” For infrequently operated units for which add-on controls or fuel changes are not justifiable, the standards are a fuel-based standard, in lb CO<sub>2</sub> per million British Thermal Units of fuel consumed (“lb CO<sub>2</sub>/mmBtu”).

No CAMS-operated or -managed facilities are affected by these standards. Final standards for new and reconstructed CTs are summarized in Table 1 below.

Table 1 - BSER and Emission Standards for New and Reconstructed Combustion Turbines

Duty Cycle	Phase I BSER and Standard (Effective 7/8/2024)	Phase II BSER and Standard (1/1/2032)
Baseload - >40% capacity factor	High-efficiency combined cycle generation (“CC”) with best O&M practices 800 lb CO <sub>2</sub> /MWh-g (heat input ≥2,000 mmBtu/hr) 800-900 lb/MWh-g (heat input <2,000 mmBtu/hr)	Highly efficient CC generation with 90% CCS 100 lb CO <sub>2</sub> /MWh-g
Intermediate Load – 20-40% CF	High-efficiency simple cycle generation (“SC”) with best O&M practices 1,170 lb CO <sub>2</sub> /MWh	No standard
Low Load - <20% CF	Use lower-emitting fuels (e.g., hydrogen, natural gas, and distillate oil) 160 lb CO <sub>2</sub> /mmBtu	No standard

### Standards for Existing Fossil-Fueled Steam Generating Units (Subpart UUUUb)

### Standards for New, Modified, and Reconstructed Steam Generating Units (Subparts TTTT and TTTTa)

The standards apply to fossil fuel-fired steam generating units (i.e., boilers) with a heat input greater than 250 mmBtu/hr and which serve a generator greater than 25 MW. While the proposed regulations were rather complex regarding applicability, BSER, and emission standards, the final rules have been

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## EPA Finalizes Greenhouse Gas Rules for Power Plants (cont.)

streamlined. Similar to the combustion turbine NSPS noted above, BSER for this group of sources is based on good O&M practices, lower emitting fuels, and, for some sources, CCS. As with the NSPS for CTs, affected sources are not required to install BSER – they are required to meet the emission rate associated with that BSER. Some of the standards for existing units are based on percentage reductions in emissions compared to a baseline period, defined as any 8 consecutive calendar quarters from July 8, 2019 through July 8, 2024. Details are provided in Table 2.

Table 2 - Standards for Existing Fossil-Fueled and New/Modified/Reconstructed Steam Generating Units

Unit Category & Description	BSER and Standard	Compliance Date
Long-term Coal Units – Units to operate after 12/31/38	CCS with 90% CO <sub>2</sub> capture (88.4% emission rate reduction in lb CO <sub>2</sub> /MWh*)	1/1/2032
Medium-term Coal Units – Units to operate after 1/1/2032, retire before 1/1/2039	Co-firing natural gas at 40% of annual heat input (16% reduction in emission rate)	1/1/2030
Short-term Coal Units – Units ceasing operation before 1/1/2032	Exempt from rule	N/A
Baseload Gas/oil Units – CF > 45%	1,400 lb CO <sub>2</sub> /MWh*	1/1/2030
Intermediate Gas/oil Units – 8% < CF ≤ 45%	1,600 lb CO <sub>2</sub> /MWh*	1/1/2030
Low load Gas/oil Units – CF ≤ 8%	130 lb CO <sub>2</sub> /mmBtu (operating on gas) 170 lb CO <sub>2</sub> /mmBtu (operating on oil)	1/1/2030

\* Standards are in lb CO<sub>2</sub> per gross MWh, assessed on a 12-rolling operating month basis. Percent reduction standards are evaluated against a unit-specific 8-calendar quarter baseline emission rate.

In CAMS' fleet, these standards affect coal-fired power plants – Gavin, Merom, Keystone, and Conemaugh – and gas- and oil-fired boiler-based power plants, specifically Oswego, Middletown, Montville, New Haven, Chalk Point, and Danskammer.

### Reliability Mechanisms

In response to significant comments relating to the potential impacts of this rule on electric grid reliability, EPA added multiple provisions intended to provide additional flexibility to address grid reliability. Generally, the maximum extension available for each provision is up to one year, and that type of extension can only be provided once.

- For units slated to retire in 2032 ("medium term units" or 2039 ("long term units"), EPA added a mechanism to allow an extension of the retirement deadline if electric reliability would be threatened by the unit's retirement. This extension mechanism must be included in the state's plan for compliance with the rule to be available. The extension application must be requested within twelve months of the scheduled retirement date and requires support from the state.
- Extensions are also available for units (existing units and new/reconstructed turbines) that intend to comply by installing control equipment, but which experience permitting delays,

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## EPA Finalizes Greenhouse Gas Rules for Power Plants (cont.)

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component equipment availability, and construction delays beyond the owner/operator's control.

- In the event of grid emergencies, EPA provides alternate performance standards during such emergencies. The alternate standards are based on lower-emitting fuels for new and reconstructed units and a baseline emission rate for existing units. Emissions during emergencies would not be counted toward the 12-operating-month emission rate.

The final rule also allows a state to consider remaining useful life and other factors in determining a final emission rate for a particular facility. "Other factors" may include electric reliability, which could provide another way to factor reliability concerns into the final compliance plan for a particular facility. This option is not described in detail in the rule and is ambiguous by design, providing states with additional flexibility to innovate. In general, a state would produce a plan that varies from the standards described above regarding the compliance options for a unit or plant and would present information demonstrating how that plan better accomplishes the intended outcomes of the Power Plant GHG Rule in that state. If approved, the plan would be implemented through requirements in the site's Title V air permit.

### Compliance Flexibility

The final rule also indicates that states may use other means of achieving emissions reductions that provide greater flexibility to affected sources. However, the final rule doesn't provide clear guidance on how states must demonstrate that these programs achieve acceptable emissions reductions. These measures could include emission trading programs like the Regional Greenhouse Gas Initiative or California Cap-and-Trade. Another possible option would be to assign unit-specific mass compliance limits, CO<sub>2</sub> tons per year emission limitations that would equate to the emissions if the standards in the final rule were applied to those units. This may be an attractive option for intermediate-term coal plants.

If you have any questions about the Power Plant GHG Rule, please contact CAMS Environmental Services.

### Consolidated Asset Management Services

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