



United States Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Office of Criminal Enforcement, Forensics and Training

National Enforcement Investigations Center

NEIC

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NEIC CIVIL INVESTIGATION REPORT

CF Industries Nitrogen
Donaldsonville, Louisiana

Investigation Dates:

February 2-5, 2026

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CONTENTS

INVESTIGATION OVERVIEW	4
PROJECT OBJECTIVE	4
FACILITY CONTACT INFORMATION	4
FACILITY OVERVIEW	4
FACILITY OPERATIONS SUMMARY	5
FIELD ACTIVITIES SUMMARY	8
INVESTIGATION OBSERVATIONS.....	10

TABLES

Table 1. PROJECT TEAM MEMBERS	4
Table 2. FACILITY CONTACT INFORMATION	4
Table 3. APPLICABLE NAICS CODES.....	4

APPENDICES (*NEIC-created documents)

- A** Title V Permit (130 pages)
- B** CFI NA Plant 1 Data **(Contains Company-claimed Confidential Business Information [CBI])** (5 spreadsheets)
- C** CFI NA Plant 2 Data **(Contains Company-claimed CBI)** (5 spreadsheets)
- D** CFI NA Plant 3 Data **(Contains Company-claimed CBI)** (5 spreadsheets)
- E** CFI NA Plant 4 Data **(Contains Company-claimed CBI)** (5 spreadsheets)
- F*** NEIC Analysis of NA Plant 1 15-minute Data **(Contains Company-claimed CBI)** (1 spreadsheet)
- G*** Summary of NEIC Analysis of NA Plant 1 15-minute Data **(Contains Company-claimed CBI)** (2 pages)
- H*** NEIC Analysis of NA Plant 1 One-hour Data **(Contains Company-claimed CBI)** (1 spreadsheet)
- I*** Summary of NEIC Analysis of NA Plant 1 One-hour Data **(Contains Company-claimed CBI)** (1 page)
- J** CFI Excess Emission Reports 2022–2025 (8 pdf files)
- K*** NEIC Analysis of NA Plant 2 15-minute Data **(Contains Company-claimed CBI)** (1 spreadsheet)
- L*** Summary of NEIC Analysis of NA Plant 2 15-minute Data **(Contains Company-claimed CBI)** (1 page)
- M*** NEIC Analysis of NA Plant 2 One-hour Data **(Contains Company-claimed CBI)** (1 spreadsheet)
- N*** Summary of NEIC Analysis of NA Plant 2 One-hour Data **(Contains Company-claimed CBI)** (1 page)
- O*** NEIC Analysis of NA Plant 3 15-minute Data **(Contains Company-claimed CBI)** (1 spreadsheet)
- P*** Summary of NEIC Analysis of NA Plant 3 15-minute Data **(Contains Company-claimed CBI)** (1 page)
- Q*** NEIC Analysis of NA Plant 3 One-hour Data **(Contains Company-claimed CBI)** (1 spreadsheet)
- R*** Summary of NEIC Analysis of NA Plant 3 One-hour Data **(Contains Company-claimed CBI)** (1 page)
- S*** NEIC Analysis of All NA Plant 4 Data **(Contains Company-claimed CBI)** (1 spreadsheet)

**These Contents pages show all the sections contained in this report
and provide a clear indication of the end of this report.**

INVESTIGATION OVERVIEW

PROJECT OBJECTIVE

U.S. Environmental Protection Agency (EPA) Region 6 (Region) requested that EPA's National Enforcement Investigations Center (NEIC) conduct a Clean Air Act (CAA) compliance investigation of the CF Industries Nitrogen (CFI) facility located at 39018 LA-3089 in Donaldsonville, Louisiana. The investigation focused on the four nitric acid (NA) plants located at the facility and the facility's compliance with New Source Performance Standards (NSPS) for Nitric Acid Plants at 40 Code of Federal Regulations (CFR) Part 60, Subpart G (NSPS G) and NSPS for Nitric Acid Plants for Which Construction, Reconstruction, or Modification Commenced After October 4, 2011, at 40 CFR Part 60, Subpart Ga (NSPS Ga).

Table 1 lists the project team members.

Table 1. PROJECT TEAM MEMBERS		
Team Member	Organization	Project Role
Hans Buening	NEIC	Project manager (PM)
Cindy Schafer	NEIC	Field team member
REGIONAL AND OTHER CONTACTS		
Prince Nfodzo	EPA Region 6	Regional field team member
Cory Lormand	Louisiana Department of Environmental Quality (LDEQ)	State field team member

FACILITY CONTACT INFORMATION

Table 2 lists the primary facility contacts.

Table 2. FACILITY CONTACT INFORMATION		
Name, Title	Phone No.	Email Address
Beth Darce, Superintendent of Environmental Engineering	(225) 473-0284	bdarce@cfindustries.com

FACILITY OVERVIEW

According to the EPA Enforcement and Compliance History Online (ECHO) database, this facility (EPA Registry Identification No. 11014466372) has the following North American Industry Classification System (NAICS) codes (**Table 3**):

Table 3. APPLICABLE NAICS CODES	
NAICS Code	Description
325311	Nitrogenous fertilizer manufacturing
325180	Other basic inorganic chemical manufacturing
325188	All other basic inorganic chemical manufacturing
211111	Crude petroleum and natural gas extraction

CFI operates under a Title V operating permit (permit No. 0180-00004-V24), which became effective October 1, 2025. The permit specifies emission limits, testing, monitoring, recordkeeping, reporting, and other specific operating requirements. NA Plants 1, 2, and 3 are subject to regulation under NSPS G, and NA Plant 4 is subject to regulation under NSPS Ga. All four NA plants are subject to the NSPS general provisions at 40 CFR Part 60, Subpart A.

FACILITY OPERATIONS SUMMARY

The CFI facility produces ammonia, granular urea, diesel exhaust fluid (liquid urea), and urea ammonium nitrate (UAN). The inspection focused on nitric acid production, which is used in the UAN production process and sold directly to customers. While there is some interdependence between different units in the CFI facility (e.g., ammonia used as a feedstock in the NA plants is produced at the facility in ammonia plants), this process description will only cover the NA production plants.

CFI operates four NA plants at its Donaldson facility. Three of the NA plants, NA Plants 1, 3, and 4, use a dual-pressure process to produce NA (also denoted as HNO_3), and NA Plant 2 uses a single-pressure process to produce NA. NA Plant 1 was constructed in 1977, NA Plant 2 was constructed in 1993, NA Plant 3 was constructed in 1998, and NA Plant 4 was constructed in 2016.

All four NA plants produce weak nitric acid, which is nitric acid that is 30-70 percent (%) in strength. For compliance with NSPS G and NSPS Ga, the facility converts the actual NA concentration to a theoretical 100% basis, as required by 40 CFR § 60.72 and 40 CFR § 60.72a.

Dual-Pressure Process

At the front end of this continuous process, ammonia enters as a liquid at approximately 120 pounds per square inch gauge (psig) and is vaporized and filtered before the pressure drops to approximately 55 psig. Ambient air enters the process. At NA Plants 3 and 4 the inlet ambient air is chilled, filtered, and compressed to approximately 55 psig. At NA Plant 1, the inlet ambient air is filtered and compressed but not chilled. The vaporized ammonia and the compressed air streams are mixed and enter the ammonia reactor where the mixed stream passes over a platinum catalyst that catalyzes the exothermic oxidation reaction of ammonia and air to generate mostly nitric oxide (NO) with smaller amounts of nitrogen dioxide (NO_2). The high-temperature NO and NO_2 stream is initially cooled in the reactor and then the NO and NO_2 stream passes through a series of heat exchangers to cool the stream further. Initially, the reaction favors NO, but as the gases cool more of the NO oxidizes to form NO_2 . Next, the cooled NO and NO_2 stream is compressed to approximately 150 psig. The compressed and cooled NO and NO_2 stream then enters the bottom of an absorber tower where it contacts water and reacts to form NA. NA Plants 3 and 4 produce nitric acid at about 65% concentration; NA Plant 1

produces nitric acid at about 55% concentration. NA from the bottom of the absorption tower is sent to storage tanks.

For NA Plants 3 and 4, the waste gas from the top of the absorption tower is heated through a series of heat exchangers (cross-current heat exchangers—the same heat exchangers used to cool the NO and NO₂ stream from the bottom of the ammonia reactor), routed through a selective catalytic reduction (SCR) unit for NO_x (NO and NO₂) emission control, used to power the compressor (tail gas expander), and then vented to the atmosphere. The SCR units for NA Plants 3 and 4 use ammonia in the SCR units to catalyze the reaction of NO/NO₂ to nitrogen gas (N₂) and water. The process is essentially the same for NA Plant 1, except NA Plant 1 has an extended absorption tower to reduce NO_x emissions and does not have an SCR unit.

Single-Pressure Process

As noted above, NA Plant 2 is a single-pressure process, which is also a continuous process. The feedstock ammonia enters NA Plant 2 at approximately 145 psig. Inlet air is filtered and compressed to approximately 145 psig. The feedstock ammonia and inlet air are mixed and sent to the ammonia reactor where a platinum catalyst is used to catalyze the reaction of ammonia and air to NO and NO₂. The remainder of the process is similar to the process for NA Plants 3 and 4 except that the NO and NO₂ stream does not get routed to a compressor prior to the absorption tower because the stream is already at the desired pressure for the absorption tower. NA Plant 2 produces nitric acid at about 60% concentration. As with NA Plants 3 and 4, NA Plant 2 uses an SCR unit for NO_x emission control.

Startup and Shutdown Operations

Shutdowns of the four nitric acid plants occur for various reasons. Planned shutdowns occur regularly to change out the catalyst in the ammonia reactors. For NA Plants 1, 3, and 4 (dual-pressure processes), the ammonia reactor catalyst is replaced every six to seven months; for NA Plant 2 (a single-pressure process), the ammonia reactor catalyst is replaced approximately every four months. Additionally, CFI will intentionally shut down the nitric acid plants if demand for NA or UAN is low. The NA plants will also shut down unexpectedly due to not meeting certain operating parameters. For example, if the air-to-ammonia ratio is not in the correct range in the ammonia reactor, the NA plant will automatically shut down. If the temperature in the ammonia reactor catalyst is not within a specific temperature range, the NA plant will automatically shut down. There are up to 50 different operating parameters per NA plant that must be met for the NA plant to continue operations; if any one of these parameters is not met the NA plant will automatically shut down.

The shutdown process is approximately the same for all four NA plants. The main difference is that some plants automatically shut off the ammonia feed and the air feed at the same time

and then turn the air feed back on after the absorption tower drains while other plants keep the air feed on throughout the shutdown process. Facility personnel can intentionally trigger a plant shutdown, or the plant will automatically go into shutdown operations if a critical operating parameter is not met. When a shutdown happens, a valve on the ammonia inlet line automatically closes, cutting off ammonia to the process; ammonia continues to flow to the SCR units. The absorption tower drains and then the plant is purged by turning on the air compressor and purging the plant with compressed air. At some point, usually about 10-15 minutes after the ammonia feed is stopped, the ammonia to the SCR units on NA Plants 2-4 is shut off as the temperature in the catalyst is no longer sufficient to catalyze the reaction of ammonia and NO_x to N_2 and water. This generally results in an increase of NO_x emissions to the atmosphere starting about 10 minutes after the ammonia feed is cut off to the process. Additionally, ammonia in the system prior to the control valve can be purged to a flare.

Starting the NA plants back up is similar for the four NA plants. Startup begins with turning on the air flow to the process and then turning on the water flow to the absorption tower. Once the absorption tower is full and sealed, which takes between one and four hours depending on the NA plant, the ammonia feed is turned on. Once the ammonia feed to the process begins, the NA plant has about 15 minutes to hit the correct ammonia-to-air ratio or else the NA plant will trip offline again. Additionally, it takes about 10 minutes of operation for the temperature in the SCR units to get high enough for the ammonia and NO_x reaction to be catalyzed; during this warmup time there are increased emissions of NO_x to the atmosphere.

Selective Catalytic Reduction

As stated above, NA Plants 2, 3, and 4 use SCR for control of NO_x emissions. According to CFI, overhead gases from the absorption tower have a NO_x concentration of approximately 500 parts per million (ppm) that does not fluctuate greatly, so the ammonia injection rates upstream from the SCR units do not require substantial adjustments. CFI operates non-certified NO_x continuous emission monitoring systems (CEMS) upstream from each SCR unit for process control purposes and operates certified redundant NO_x CEMS downstream from each SCR unit. NA Plant 1 (which does not have an SCR unit) also has certified redundant NO_x CEMS at the stack. For the redundant certified NO_x CEMS, each monitor is treated the same for purposes of daily calibration checks, cylinder gas audits, and relative accuracy test audits.

The ammonia used for the SCR units is a small slip stream pulled off the main feedstock ammonia to each plant. The SCR inlet gas stream temperature is approximately 700 degrees Fahrenheit ($^{\circ}\text{F}$) for NA Plant 2, approximately 410 $^{\circ}\text{F}$ for NA Plant 3, and approximately 815 $^{\circ}\text{F}$ for NA Plant 4. It is unclear why each SCR unit has a different operating temperature range, as CFI stated the SCR catalysts are vanadium pentoxide and catalyst replacement for each SCR unit is very rare (at least a 10-year catalyst life).

FIELD ACTIVITIES SUMMARY

The NEIC inspection team consisted of Hans Buenning and Cindy Schafer. The NEIC inspection team was joined by Prince Nfodzo from EPA Region 6 and Cory Lormand from LDEQ during the on-site inspection. On February 2, 2026, NEIC inspectors conducted an opening meeting and presented credentials to Beth Darce of CFI. During the opening meeting, CFI provided a high-level overview of the primary facility operations. CFI stated that NA Plants 1 and 2 were down for turnarounds, but NA Plants 3 and 4 were operating.

After the opening conference, CFI personnel presented in-depth descriptions of each of the four NA plants. CFI presented process flow diagrams for each NA plant showing each step of the process, including the vaporizers, mixers, reactors, various heat exchangers, absorbers, and SCR units (if applicable). After the process discussions, NEIC asked questions related to CFI's startup and shutdown operations for the NA plants and how NO_x data are treated during these periods, as well as NO_x CEMS downtime.

After watching a safety video, NEIC, EPA Region 6, and LDEQ inspectors performed a facility walk-through of the two operating NA plants: NA Plants 3 and 4. The walk-through began in the NA Plant 3 control room, where NEIC inspectors observed control screen monitors and interviewed control room operators regarding current operating conditions, startup and shutdown operations, and SCR operations. NEIC inspectors also requested that CFI operators pull up data trend screens showing operating and emission data going back to early January 2026. During this discussion NEIC inspectors noted that NA Plant 3 tripped offline on January 24, 2026, because of a "compressor surge." According to CFI personnel, a compressor surge is usually due to a lack of air to the compressor, which may be related to a valve problem. The walk-through then proceeded to the NO_x CEMS shack, where NEIC inspectors observed monitors, output screens, and calibration gas documentation (certificates of analysis) and interviewed CFI personnel that oversee the CEMS operations.

CFI personnel then led the inspection team through the NA Plant 3 processes. The walk-through included, but was not limited to, the ammonia vaporizer, air intake chiller, plant compressors (steam turbine, NO_x compressor, air compressor, and expander), mixer, reactor, absorber tower, SCR, and the main stack (including visually following the CEMS sample lines from the stack to the CEMS shack).

For NA Plant 4, the facility walk-through was similar to that of NA Plant 3 but did not cover as much of the process equipment. The walk-through for NA Plant 4 also began in the control room, where NEIC inspectors observed control screen monitors and interviewed control room operators regarding current operating conditions, startup and shutdown operations, and SCR operations. NEIC inspectors also requested that CFI operators pull up data trend screens showing operating and emission data going back to early January 2026. During this discussion NEIC inspectors noted that NA Plant 4 tripped offline for approximately five hours early in the morning on January 26, 2026, because of a boiler going down. NEIC inspectors also noted that the unit was using its backup NO_x CEMS because the primary CEMS went down on January 29,

2026. The walk-through then proceeded to the NO_x CEMS shack, where NEIC inspectors observed monitors, output screens, and calibration gas documentation (certificates of analysis) and interviewed CFI personnel that oversee the CEMS operations.

CFI personnel then led the inspection team through a portion of NA Plant 4. This included the SCR and the main stack (including visually following the CEMS sample lines from the stack to the CEMS shack).

While on-site, NEIC also had detailed discussions with CFI about the NO_x CEMS data requested by NEIC and how CFI could best format that data before submitting it to NEIC after the on-site inspection. NEIC inspectors also conducted a review of certain documents NEIC requested from CFI that were provided while on-site, including the most recent performance test reports for all four NA plants under NSPS Subpart G and NSPS Subpart Ga and related documentation of conversion factors used for each plant to convert measured NO_x ppm CEMS values to pounds per ton of NA production. NEIC inspectors also raised one potential issue with the calibration gas span values used by CFI that was noted during the inspection. CFI explained the facility's position on its use of the selected span values and its interpretation of the regulatory allowance on the span value as it relates to an LDEQ approval for an alternative span range of 0-250 ppm NO₂ for NA Plants 2 and 3.

Lastly, NEIC conducted a closing meeting with CFI to summarize the on-site inspection activities. NEIC stated that inspection results were pending review of documents received and requested and NEIC analysis of the NO_x CEMS data once provided by CFI.

Further details related to NEIC's field observations, record review, and post-inspection data analysis are described in the Investigation Observations section of this report.

INVESTIGATION OBSERVATIONS

NEIC identified the following observation after the CAA compliance inspection. NEIC field team members did not discuss the observation below with facility representatives during the inspection closeout meeting because it required additional information and analysis following the inspection closeout meeting.

This observation is not a final compliance determination. EPA Region 6 will make the final compliance determinations based on its review of this report and other technical, regulatory, and facility information.

Observation 1

Observation Summary: NEIC reviewed NO_x CEMS data provided by CFI for all four NA plants and identified exceedances of the NSPS Subpart G nitrogen oxides emission limit in data provided by CFI for NA Plants 1 and 3. Based on the number of overall exceedances identified by NEIC, CFI has not reported many of the emission limit exceedances in the semi-annual excess emissions reports.

Citation:

40 CFR Part 60, Subpart A—General Provisions

40 CFR § 60.7 Notification and record keeping.

(c) Each owner or operator required to install a continuous monitoring device shall submit excess emissions and monitoring systems performance report (excess emissions are defined in applicable subparts) and-or summary report form (see paragraph (d) of this section) to the Administrator semiannually, except when: more frequent reporting is specifically required by an applicable subpart; or the Administrator, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th day following the end of each six-month period. Written reports of excess emissions shall include the following information:

(2) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted.

40 CFR Part 60, Subpart G—Standards of Performance for Nitric Acid Plants

40 CFR § 60.70 Applicability and designation of affected facility.

(b) Any facility under paragraph (a) of this section that commences construction or modification after August 17, 1971, and on or before October 14, 2011 is subject to the requirements of this subpart. Any facility that commences construction or modification after October 14, 2011 is subject to subpart Ga of this part.

40 CFR § 60.72 Standard for nitrogen oxides.

(a) On and after the date on which the performance test required to be conducted by § 60.8 is completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility any gases which:

(1) Contain nitrogen oxides, expressed as NO₂, in excess of 1.5 kg per metric ton of acid produced (3.0 lb per ton), the production being expressed as 100 percent nitric acid.

40 CFR § 60.73 Emission monitoring.

(e) For the purpose of reports required under § 60.7(c), periods of excess emissions that shall be reported are defined as any 3-hour period during which the average nitrogen oxides emissions (arithmetic average of three contiguous 1-hour periods) as measured by a continuous monitoring system exceed the standard under § 60.72(a).

40 CFR Part 60, Subpart Ga—Standards of Performance for Nitric Acid Plants for Which Construction, Reconstruction, or Modification Commenced After October 14, 2011**40 CFR § 60.70a Applicability and designation of affected facility.**

(b) This subpart applies to any nitric acid production unit that commences construction or modification after October 14, 2011.

40 CFR § 60.71a Definitions.

As used in this subpart, all terms not defined herein shall have the meaning given them in the Act and in subpart A of this part.

Operating day means a 24-hour period beginning at 12:00 a.m. during which the nitric acid production unit operated at any time during this period.

40 CFR § 60.72a Standards.

Nitrogen oxides. *On and after the date on which the performance test required to be conducted by § 60.73a(e) is completed, you may not discharge into the atmosphere from any affected facility any gases which contain NO_x, expressed as NO₂, in excess of 0.50 pounds (lb) per ton of nitric acid produced, as a 30-day emission rate calculated based on 30 consecutive operating days, the production being expressed as 100 percent nitric acid. The emission standard applies at all times.*

40 CFR § 60.75a Calculations.

(a) You must calculate the 30 operating day rolling arithmetic average emissions rate in units of the applicable emissions standard (lb NO_x/ton 100 percent acid produced) at the end of each operating day using all of the quality assured hourly average CEMS data for the previous 30 operating days.

(b) You must calculate the 30 operating day average emissions rate according to Equation 1...

Observation 1**Evidence:****Appendix A** – Title V Permit**Appendix B** – CFI NA Plant 1 Data **(Contains Company-claimed CBI)****Appendix C** – CFI NA Plant 2 Data **(Contains Company-claimed CBI)****Appendix D** – CFI NA Plant 3 Data **(Contains Company-claimed CBI)****Appendix E** – CFI NA Plant 4 Data **(Contains Company-claimed CBI)****Appendix F** – NEIC Analysis of NA Plant 1 15-minute Data **(Contains Company-claimed CBI)****Appendix G** – Summary of NEIC Analysis of NA Plant 1 15-minute Data **(Contains Company-claimed CBI)****Appendix H** – NEIC Analysis of NA Plant 1 1-hour Data **(Contains Company-claimed CBI)****Appendix I** – Summary of NEIC Analysis of NA Plant 1 1-hour Data **(Contains Company-claimed CBI)****Appendix J** – CFI Excess Emission Reports 2022–2025**Appendix K** – NEIC Analysis of NA Plant 2 15-minute Data **(Contains Company-claimed CBI)****Appendix L** – Summary of NEIC Analysis of NA Plant 2 15-minute Data **(Contains Company-claimed CBI)****Appendix M** – NEIC Analysis of NA Plant 2 1-hour Data **(Contains Company-claimed CBI)****Appendix N** – Summary of NEIC Analysis of NA Plant 2 1-hour Data **(Contains Company-claimed CBI)****Appendix O** – NEIC Analysis of NA Plant 3 15-minute Data **(Contains Company-claimed CBI)****Appendix P** – Summary of NEIC Analysis of NA Plant 3 15-minute Data **(Contains Company-claimed CBI)****Appendix Q** – NEIC Analysis of NA Plant 3 1-hour Data **(Contains Company-claimed CBI)****Appendix R** – Summary of NEIC Analysis of NA Plant 3 1-hour Data **(Contains Company-claimed CBI)****Appendix S** – NEIC Analysis of All NA Plant 4 Data **(Contains Company-claimed CBI)**

Description of Observation: According to CFI's Title V permit, NA Plants 1, 2, and 3 are subject to NSPS Subpart G and NA Plant 4 is subject to NSPS Subpart Ga (**Appendix A**, Pages 103-104 and 114-116).

As part of this inspection, NEIC requested hourly NO_x emission data for NA Plants 1, 2, 3, and 4 from January 1, 2022-January 31, 2026. For NA Plant 1, CFI provided 15-minute data for the period January 1, 2022-June 30, 2025, and CFI provided one-hour data for the period July 1, 2025-January 31, 2026 (**Appendix B**). For NA Plants 2 and 3, CFI provided 15-minute data for the periods January 1, 2022-June 30, 2025, and November 21, 2025-January 31, 2026, and CFI provided one-hour data for the period July 1, 2025-November 20, 2025 (**Appendix C**; **Appendix D**). For NA Plant 4, CFI provided 15-minute data for the entire period from January 1, 2022-January 31, 2026 (**Appendix E**).

NEIC's analysis of CFI's data identified 51 exceedances of the three-hour 3.0 pound per ton (lb/ton) limit in the NA Plant 1 15-minute data; 46 of these exceedances occurred during periods the unit was offline according to information provided by CFI (**Appendix F**; **Appendix G**). NEIC's analysis of CFI's data identified six exceedances of the three-hour 3.0 lb/ton limit in the NA Plant 1 one-hour data (**Appendix H**; **Appendix I**); none of these exceedances occurred during periods the unit was offline according to information provided by CFI. In total, NEIC identified 11 exceedances of the three-hour 3.0 lb/ton limit in the NA Plant 1 data that were not affected by unit offline periods.

Observation 1

NEIC reviewed eight excess emission reports submitted by CFI (first and second halves of 2022, 2023, 2024, and 2025) and found that CFI reported zero emission standard exceedances for the No. 2 Nitric Acid Absorber, No. 3 Nitric Acid Absorber, and No. 4 Nitric Acid Absorber (**Appendix J**). For the No. 1 Nitric Acid Absorber covering reporting years 2022-2025, CFI only reported two three-hour periods exceeded the emission standard in the second half of 2023. Because the excess emission reports do not specify the timeframes of exceedances, NEIC was not able to compare the exceedances reported by CFI to the exceedances identified by NEIC. However, based on the number of overall exceedances identified by NEIC, CFI has not reported many of the 3.0 lb/ton limit exceedances for NA Plant 1. While many of these exceedance periods occurred when CFI identified the plant as offline, 40 CFR § 60.73 does not specifically exempt reporting emission exceedances, even if it is during a period of unit startup, shutdown, or malfunction.

NEIC's analysis of CFI's NA Plant 2 data did not identify any exceedances of the three-hour 3.0 lb/ton limit (**Appendix K; Appendix L; Appendix M; Appendix N**).

NEIC's analysis of CFI's data identified 25 exceedances of the three-hour 3.0 lb/ton limit in the NA Plant 3 15-minute data; 24 of these exceedances occurred during periods the unit was offline according to information provided by CFI (**Appendix O; Appendix P**). NEIC's analysis of CFI's data identified one exceedance of the three-hour 3.0 lb/ton limit in the NA Plant 3 one-hour data; this exceedance occurred during a period the unit was offline according to information provided by CFI (**Appendix Q; Appendix R**). In total, NEIC identified one exceedance of the three-hour 3.0 lb/ton limit in the NA Plant 3 data that was not affected by unit offline periods. As noted above, CFI has not reported any exceedances of the 3.0 lb/ton limit exceedances for NA Plant 3. While many of these exceedance periods occurred when CFI identified the plant as offline, 40 CFR § 60.73 does not specifically exempt reporting emission exceedances, even if it is during a period of unit startup, shutdown, or malfunction.

NEIC's analysis of CFI's NA Plant 4 data did not identify any exceedances of the 30-operating-day 0.50 lb/ton limit (**Appendix S**).