



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**
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PERMITTEE

INEOS New Planet BioEnergy
925 74th Avenue
Vero Beach, FL 32968-9702
Authorized Representative:
Mr. Nigel Falcon, President

Air Permit No. 0610096-007-AC
Permit Expires: December 31, 2016
Indian River County BioEnergy Facility
Minor Source Air Construction Permit
Biomass to Ethanol Production

PROJECT

This is the final air construction permit, which authorizes modification of a previously issued construction permit (0610096-004-AC) for a waste-to-ethanol production facility that uses as its primary feedstock biomass, vegetative matter, yard waste, land clearing debris, untreated wood, municipal solid waste (MSW) and similar materials available from the Indian River County (IRC) Solid Waste Disposal District (SWDD) curbside collection program. The facility is located at 925 74th Avenue in Vero Beach, Florida in Indian River County (IRC). At full capacity, the facility will produce up to 8 million gallons of ethanol per year, and although it will generate a small amount of electricity available for commercial use (about 6 megawatts gross, with 2 megawatts net exported), it is categorized under Standard Industrial Classification Code No. 2869—Industrial Organic Chemicals, Not Elsewhere Classified. The UTM coordinates are Zone 17, 550.7 kilometers (km) East and 3,051.3 km North.

This permit is organized into the following sections: Section 1 (General Information), Section 2 (Administrative Requirements), Section 3 (Emissions Unit Specific Conditions) and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix CF of Section 4 of this permit.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection (Department) in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

for Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Permit (including the Final Determination, Final Permit, and Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

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Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

SECTION 1. GENERAL INFORMATION

PROPOSED PROJECT

INEOS New Planet BioEnergy, LLC (INPB) is operating the Indian River County BioEnergy (INEOS Bio) facility to produce ethanol from a biomass feedstock consisting of mostly vegetative yard waste, clean woody biomass, construction and demolition (C&D) debris and municipal solid waste (MSW). Construction of the facility has been completed with the facility operating at a minimal level and currently not utilizing MSW as a feedstock.

The INEOS Bio ethanol technology process gasifies the biomass feedstock. The organic material is not be directly combusted; instead, oxygen is supplied to the gasifier which converts the feed material into a synthetic gas (syngas) consisting of carbon monoxide (CO), carbon dioxide (CO₂), hydrogen (H₂) and other hydrocarbons. Under most circumstances, this syngas is not directly combusted. It is cleaned and cooled and then fed into a fermentation system where proprietary bacterial metabolic action converts the syngas into ethanol. The ethanol is then distilled, dehydrated, denatured, stored and loaded into dedicated ethanol tanker trucks for shipment offsite.

This project is for the modification of a previously issued air construction permit (Permit No. 0610096-004-AC) for a waste biomass-to-ethanol production facility. According to INPB, the gasification of vegetative matter produces low levels of hydrogen cyanide (HCN) in the syngas of between 15 and 200 parts per million (ppm) depending on the operating conditions in the gasifier. In general, a higher gasifier temperature is required to achieve a lower HCN concentration. However, operating the gasifier at a very high temperature may lead to equipment unreliability, poor availability and high maintenance costs. The HCN in the syngas is toxic to the bio-organisms in the fermentation process and INPB has determined through pilot scale testing that HCN at a level of 15 ppm is too high for the bio-organisms in the fermentation process to survive. It has been determined that the maximum HCN concentration for bio-organisms survival is less than 10 ppm with levels of less than 1 ppm HCN projected to be required for the fermentation bio-organisms to survive and to reliably meet the project design targets. Consequently, this project authorizes INPB to construct and operate a wet scrubber to remove the HCN from the syngas after the gasification process at the INEOS Bio facility. This additional cleanup system will reduce the HCN concentration in the syngas to a level that is not harmful to the bio-organisms used in the fermentation process.

This project consists of the following emissions units (EU). The wet scrubber installation will affect EU 003 the Gasification, Fermentation and Distillation Systems (highlighted in yellow).

EU No.	Emission Unit Description
001	Materials Handling Area
002	Feedstock Dryers No. 1 and No. 2
003	Gasification, Fermentation and Distillation Systems
004	Distillation Unit Fugitive Emissions
006	Vent Gas Boiler
007	Tank Farm
008	Loadout Flare
010	Syngas Flare
011	Emergency Equipment

FACILITY REGULATORY CLASSIFICATION

- The facility is **not** a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. (PSD).

SECTION 1. GENERAL INFORMATION

- The facility operates units that are subject to the New Source Performance Standards (NSPS) at 40 Code of Federal Regulations, Part 60 (40 CFR 60), and the National Emissions Standards for Hazardous Air Pollutants (NESHAP) at 40 CFR 63.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The Permitting Authority for this project is the Office of Permitting and Compliance in the Division of Air Resource Management of the Department (2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400). The Permitting Authority for permits to operate this facility is the Air Resource Section of the Department's Central District Office (3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767).
2. Compliance Authority: The Compliance Authority for this project is the Air Resource Section of the Department's Southeast District Office (400 North Congress Avenue, 3rd Floor, West Palm Beach, FL 33401). All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Compliance Authority.
3. Appendices: The following Appendices are attached as a part of this permit and must be complied with by the permittee:
 - a. Appendix CF: Citation Formats, Acronyms and Glossary of Common Terms;
 - b. Appendix GC: General Conditions;
 - c. Appendix CC: Common Conditions;
 - d. Appendix CTR: Common Testing Requirements; and
 - e. Appendix GP: General Provisions
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, Florida Statutes; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: No emissions unit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Source Obligation: At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification. [Rule 62-212.400(12), F.A.C.]
8. Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emissions units. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after completing the required work and commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050 and 62-4.220, F.A.C. and Chapter 62-213, F.A.C.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS

9. Annual Operating Report: The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year and submitted to the Compliance Authority by April 1 of the following year. [Rule 62-210.370(3), F.A.C.]
10. Reasonable Precautions to Prevent Emissions of Unconfined Particulate Matter (PM): The facility shall take the following reasonable precautions to prevent emissions of unconfined PM:
- All normally traveled roads on the site shall be paved.
 - Access paths used exclusively for maintenance purposes may be unpaved.
 - Speed limit signs will be posted.
 - The unpaved areas of the facility shall be maintained and either sodded or landscaped as necessary.
 - The conveyor systems outside of the materials handling area shall be fully enclosed.
 - Hoods, fans, filters or similar equipment shall be used to contain, capture or vent particulate matter.
 - The ash shall be wetted before being stored in the ash handling roll-off bins.
- [Rule 62-296(4)(c), F.A.C.]
11. Objectionable Odors Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. Prior to the use of MSW that creates objectionable odors (i.e. putrescible household waste and institutional waste), the permittee shall submit an odor control plan to the Compliance Authority that addresses how the facility will control MSW odors, such as through implementing a "first in/first out" material handling practice; storing MSW in an enclosed area; limiting on-site storage of MSW to 48 hours or less; or other procedures. After the conclusion of a 120 day period continuously using such MSW, the permittee shall revise and resubmit the odor control plan to the Compliance Authority. If objectionable odors arise while any type of MSW is processed, the permittee shall take immediate actions to eliminate the odors. In addition, the permittee shall within 10 days submit a plan to the Compliance Authority documenting the corrective actions taken to eliminate the odors and outlining how in the future objectionable odors will be prevented.
[Application No. 0610096-004-AC; Rule 62-296.320(2), F.A.C. and Rule 62-4.070, F.A.C. Reasonable Assurance]
12. Standard Conditions: As used in this permit, standard conditions refers to a temperature of 68 °F and a pressure of 14.7 pounds per square inch absolute (psia).
[Rule 62-210.200, F.A.C. Definition of "Standard Conditions"]
13. Dried Tons: As used in this permit, "dried tons" refers to solid material with 15 percent moisture content. [Rule 62-4.070, F.A.C. Reasonable Assurance]

This permit adds/modifies specific conditions in **Section III. Emission Unit Specific Conditions, subsection C: Gasification, Fermentation and Distillation Systems (EU-003)** of previously issued Air Construction Permit No. 0610096-004-AC. Changes are denoted in **yellow highlight** with additions in **double underline** text and deletions in **strike through** text.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

C. Gasification, Fermentation and Distillation Systems (EU-003)

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
003	<u>Gasification, Fermentation and Distillation Systems:</u> Two gasifiers heat feedstock through starved-air pyrolysis to produce syngas, a mixture of CO, CO ₂ , H ₂ and other hydrocarbons. The syngas is cleaned and bubbled through the fermentation system. The distillation system extracts ethanol from the filtered fermentation broth. This emissions unit also includes equipment to accomplish waste heat recovery; dry gas cleaning; syngas quench and compression; and vent gas scrubbing.

APPLICABLE STANDARDS AND REGULATIONS

1. NSPS for Equipment Leaks of VOC (Appendix VVa): 40 CFR Part 60, Subpart VVa—Standards of Performance for Equipment Leaks of VOC in the SOCM for Which Construction, Reconstruction or Modification Commenced After November 7, 2006—applies to each pump, compressor, pressure relief device, sampling connection system, open-ended valve or line, valve, flange or other connector that contains or contacts a process fluid that is at least 10 percent VOC by weight. It also applies to any devices or systems that it requires to be installed. The permittee shall comply with the requirements of the NSPS, included as Appendix VVa, for all subject equipment. [Application No. 0610096-001-AC and Rule 62-296.100(3), F.A.C.]
2. Closed Vent Systems and Control Devices: During normal operation, off-gas from the fermentation and distillation systems shall be collected and routed via closed vent systems to scrubbers (the process vent gas scrubber or distillation overhead scrubber, respectively) prior to being routed to a control device. The control device for these streams shall be the vent gas boiler (EU-006). [Application No. 0610096-002-AC and Rule 62-4.070(3), F.A.C. Reasonable Assurance]
3. Preliminary LDAR Program: Because the final list of subject equipment will not be known until the facility's design is complete, the permittee shall implement the preliminary LDAR program contained in Appendix LDAR until a final LDAR program is submitted to the Compliance Authority. The permittee shall submit the final LDAR plan and otherwise demonstrate compliance with the NSPS, included as Appendix VVa, within 180 days of initial startup. [Application No. 0610096-001-AC and Rule 62-4.070(3), F.A.C. Reasonable Assurance]

EQUIPMENT

4. Gasifiers: The permittee is authorized to install two gasifiers, each consisting of a two-stage, upper and lower gasification zone with a dedicated ram feeder to feed the dried feedstock. The gasifiers shall be equipped with emergency vent valves that can route syngas to the syngas flare (EU-010) in the event of emergencies such as a failure of the electrical supply to the plant or high pressure in the system caused by the blockage of downstream equipment. The permittee is authorized to install ancillary equipment to cool the syngas and to recover waste heat through the boiler feed water preheater. [Application No. 0610096-001-AC and Rule 62-4.070(3), F.A.C. Reasonable Assurance]
5. Dry Gas Cleanup Packages: The permittee is authorized to install two dry gas cleanup packages, each of which consists of activated carbon and sodium bicarbonate injection followed immediately by a fabric filter. Exhaust from the fabric filter is not emitted to the atmosphere, but is routed to syngas quench and compression. [Application No. 0610096-002-AC and Rule 62-4.070(3), F.A.C. Reasonable Assurance]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

C. Gasification, Fermentation and Distillation Systems (EU-003)

6. Syngas Quench and Compression: The permittee is authorized to install a quench tower to further cool the cleaned and filtered syngas, an electrical driven gas compression system and ancillary equipment including a cooled water heat exchanger and a knock-out drum.
[Application No. 0610096-001-AC and Rule 62-4.070(3), F.A.C. Reasonable Assurance]
7. Fermentation and Distillation System: The permittee is authorized to install a fermentation and distillation system consisting of fermentation vessels, distillation feed tank, distillation tower, reflux drum and dehydration system.
[Application No. 0610096-001-AC and Rule 62-4.070(3), F.A.C. Reasonable Assurance]
8. Vent Gas Scrubbing: The permittee is required to install a process vent gas scrubber for the fermentation off-gases. Emergency release from the process vent gas scrubber shall be routed to the syngas flare (EU-010). [Application No. 0610096-001-AC and Rule 62-4.070(3), F.A.C. Reasonable Assurance]
9. Distillation Overhead Scrubbing: The permittee is required to install a distillation overhead scrubber for the distillation and dehydration system off-gases. Emergency release from the process distillation area overhead scrubber shall be routed to the syngas flare (EU-010). Emergency release from the distillation system emergency relief valves may be vented to the atmosphere.
[Application No. 0610096-002-AC and Rule 62-4.070(3), F.A.C. Reasonable Assurance]
10. Hydrogen Cyanide (HCN) Wet Scrubber: The permittee is authorized to install a HCN wet scrubber consisting of the following equipment:
 - a. Tower 1 (Syngas HCN Scrubber): Tower 1 will be a fixed-bed, counter-current flow, packed tower. Syngas will enter under the bed and will mix with the scrubbing water that is sprayed and evenly distributed over the top surface of the packed bed. Scrubbing water is pumped from Tower 2 (HCN Stripper) after HCN has been removed from the water stream using forced air. The HCN free syngas will then be sent to syngas header and fed to the fermentation train for ethanol production.
 - b. Tower 2 (HCN Stripper): Tower 2 will be the same basic design. A fixed-bed, counter-current, packed tower. The HCN will be stripped from the water stream by a blown air stream and the HCN containing air will be sent to Tower 3.
 - c. Tower 3 (Air HCN Scrubber): Tower 3 will absorb the HCN from the air stream into the water stream, also using the same fixed-bed, counter-current flow design used in Towers 1 and 2. The HCN free air (95% or greater HCN removal, as guaranteed by the vendor) will be discharged to atmosphere from the top of Tower 3. The HCN containing water will be treated in-situ with a bleach and caustic solution to neutralize the dissolved HCN in the water. The treated water will then be disposed of normally as with other plant waste water in the site direct injection well (DIW).
[Application No. 0610096-007-AC]

PERFORMANCE RESTRICTIONS

11. Primary Authorized Feedstock: Biomass, vegetative matter, yard waste, land clearing debris and untreated wood is authorized to be used as feedstock to the gasification system. Feedstock processing for both gasifiers combined is limited to an annual average throughput of no more than 365 dried tons (15% moisture) per day on a rolling 12-month basis.
[Application No. 0610096-004-AC; Rule 62-210.200, F.A.C. Definitions of "Biomass," "Yard Waste," "Untreated Wood" and "Solid Waste"; and Rule 62-4.070(3), F.A.C. Reasonable Assurance]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

C. Gasification, Fermentation and Distillation Systems (EU-003)

- 12. MSW Trial Period:** During an MSW trial period not to exceed 120 continuous days, MSW is authorized to be used as a feedstock, alone or in combination with biomass, subject to the following requirements.
- Feedstock:** The permittee may fire MSW alone or in combination with the biomass feedstock. MSW processing is limited to no more than 365 dry tons per day for both gasifiers combined. A maximum of 10,950 dry tons of MSW is authorized to be processed during the MSW trial period.
 - Notification:** The permittee shall notify the Compliance Authority at least 30 days prior to commencement of the MSW trial period.
 - Testing:** The permittee shall conduct stack tests at the vent gas boiler stack (EU-006), using the methods and procedures specified in Appendix AAAA, for the following pollutants: PM, lead, mercury, hydrogen chloride (HCl) and cadmium. The permittee may repeat this testing during or after the MSW trial period so as to demonstrate compliance at different MSW feed rates.
 - Report:** Prior to initiating routine processing of MSW in the gasifiers as authorized by Condition 3.C.12, the permittee shall submit a report to the Compliance Authority that uses available monitor and stack test data to evaluate the impact of processing MSW on emissions of the following pollutants: nitrogen oxides (NO_x), CO, sulfur dioxide (SO₂), PM, lead, mercury, HCl and cadmium.
- [Application No. 0610096-002-AC and Rule 62-4.070(3), F.A.C. Reasonable Assurance]
- 13. MSW Feedstock:** After submitting the report specified in **Condition 3.C.11.d**, MSW is authorized to be used as feedstock to the gasification system. MSW processing for both gasifiers combined is limited to a 12-month rolling annual average throughput of no more than 110 percent of the dried tons per day achieved for both gasifiers combined during the most recent testing conducted pursuant to **Condition 3.C.11.c**. [Rule 62-4.070(3), F.A.C. Reasonable Assurance]
- 14. Authorized Fuels:** Natural gas and landfill gas are authorized to be fed to the gasifier bottom chamber start-up burners in order to bring the system up to temperature until the solid feed is started. During normal operation, butanol from the distillation system is authorized to be fed to the gasifier burners. [Application No. 0610096-001-AC and Rule 62-4.070(3), F.A.C. Reasonable Assurance]
- 15. Hours of Operation:** The hours of operation of this emission unit are not limited (8,760 hours per year). [Application No. 0610096-001-AC; Rule 62-4.070(3), F.A.C. Reasonable Assurance; and Rule 62-210.200, F.A.C. Definition of "Potential to Emit"]
- 16. Ethanol Production Rate:** Ethanol production is limited to 8.00 million gallons per year on a rolling 12-month basis. [Application No. 0610096-001-AC; Rule 62-4.070(3), F.A.C. Reasonable Assurance; and Rule 62-210.200, F.A.C. Definition of "Potential to Emit"]
- {Permitting Note: The final product with the addition of a denaturant is limited to 8.42 million gallons per year.}*
- 17. Ethanol Capture, Fermentation System:** The process vent gas scrubber shall be designed to remove 95 percent of the residual ethanol from the fermentation system off-gases. [Application No. 0610096-001-AC; Rule 62-4.070(3), F.A.C. Reasonable Assurance; and Rule 62-210.200, F.A.C. Definition of "Potential to Emit"]
- 18. Ethanol Capture, Distillation and Dehydration System:** The distillation overhead scrubber shall be designed to remove 95 percent of the residual ethanol from the distillation and dehydration system off-gases. [Application No. 0610096-002-AC; Rule 62-4.070(3), F.A.C. Reasonable Assurance; and Rule 62-210.200, F.A.C. Definition of "Potential to Emit"]
- 19. H₂S Concentration Limit:** The concentration of H₂S in the fermenter off gas and syngas streams shall not exceed 500 part per million by volume (ppmv). [Application No. 0610096-001-AC; Rule 62-4.070(3), F.A.C. Reasonable Assurance; and Rule 62-210.200, F.A.C. Definition of "Potential to Emit"]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

C. Gasification, Fermentation and Distillation Systems (EU-003)

MONITORING REQUIREMENTS

20. H₂S Concentration: The concentration of H₂S in the fermenter off gas (vent gas) shall be monitored in ppmv at least once per hour with a continuous on-line gas chromatograph to show that it is 500 ppmv or less. The concentration in ppmv of H₂S in the syngas steam from the gasifiers shall be monitored monthly by collecting bag or canister samples from the inlet port to the fermenter and injecting the samples into a chromatograph for analysis. As an alternative the samples may be sent off-site to a certified laboratory for analysis. If the average H₂S concentration of the first 12 monthly samples of the syngas is 400 ppmv or less, with no sample exceeding 500 ppmv, sampling may hence forth be done on a quarterly basis. Any exceedance of the H₂S concentration limit of 500 ppmv shall be reported to the Compliance Authority within 48 hours.

[Application No. 0610096-004-AC; Rule 62-4.070(3), F.A.C. Reasonable Assurance; and Rule 62-210.200, F.A.C. Definition of "Potential to Emit"]

RECORDS AND REPORTS

21. Recordkeeping Requirements: The permittee shall maintain records of the amount of ethanol produced (gallons per year) on a rolling 12-month basis. The permittee shall maintain records of all H₂S concentration tests. These records shall be kept and made available to the Compliance Authority upon request. [Rule 62-4.070(3), F.A.C. Reasonable Assurance]

22. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix CTR of this permit. In addition, the concentration of H₂S in the fermenter off gas (vent gas) monitored with a continuous on-line gas chromatograph shall be reported. [Rule 62-297.310(8), F.A.C.]

ADDITIONAL TESTING REQUIREMENTS

23. Initial HCN Stack Test: The stack of Tower 3 of the HCN wet scrubber shall be tested to demonstrate the HCN emission rate in pounds per hour (lb/hr) within 60 days after achieving permitted ethanol production capacity, but not later than 180 days after initial operation of the HCN wet scrubber. Results of this initial HCN test shall be reported to the Compliance Authority within 30 days of the completion of the test. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

{Permitting Note: INPB may request addition time to conduct this initial HCN compliance test if EPA approval of Air Permit No. 0610096-005-AC is delayed. That permitting action would no longer subject the INEOS bio facility to the requirements of NSPS 40 CR 60, Subpart AAAA - Standards of Performance for Small Municipal Waste Combustion Units for Which Commenced After August 30, 1999 or for Which Modifications or Reconstruction is Commenced After June 6, 2001.}