Florida Department of Environmental Protection
Northwest District
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

May 7, 2012

By Electronic Mail, Received Receipt Requested
gmartin@greencirclebio.com

Mr. Greg Martin
VP Manufacturing and Plant Manager
Green Circle Bio Energy Inc.
2500 Green Circle Parkway
Cottondale, Florida 32431

Dear Mr. Martin:

This is to acknowledge receipt of your application for an air construction permit, DEP file number 0630058-011-AC, for the Cottondale Wood Pellet Processing Plant in Jackson County.

Your application for permit is incomplete. Please provide the information listed below pursuant to Rules 62-213.420(1)(b)3 and 62-4.070(1), Florida Administrative Code (F.A.C.). Evaluation of your proposed project will be delayed until all requested information has been received. References made below to "Application" refer to DEP Form No. 62-210.900(1), effective March 11, 2010 and its instructions. If your response to any of the below items requires new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. In Application Section II, Emissions Unit Information, Section [2], Dryer Line No. 3, Attachments, a drawing of Dryer Line No. 3 (EU XXX) process vents/stacks with vent/stack identification was not provided. Provide a drawing for Dryer Line 3 process vents/stacks with vent/stack identification. Also provide:
    a. For Dryer Line No. 3, provide a detailed process gas flow diagram. Include in the diagram where process gas after the dryer exit is re-circulated, where process gas is reheated to generate steam for pelletizing, and all materials, fuels, and process gas flows with control devices and emission points. For Dryer Lines 1 and 2, provide a detailed process flow diagram for this part of the facility, specifically the furnaces, steam generators and dryers. Include in the diagram where process gas after the dryer exit is re-circulated, where process gas is reheated to generate steam for pelletizing, and all materials, fuels, and process gas flows with control devices and emission points.
    b. For each Dryer Line, please indicate for each pollutant, which vent/stack will be used for emissions stack testing.

2. In Application Section II, Emissions Unit Information, Section [3], Pelletizing Line Nos. 1, 2, and 3 (EUs 004, 005 and 006), Attachments, a drawing of Pelletizing Line Nos. 1, 2, and 3 process vents/stacks with vent/stack identification was not provided. Provide a drawing showing all three Pelletizing Lines process vents/stacks with vent/stack identification. Additionally, for each Pelletizing Line, please indicate for each pollutant, which vent/stack will be used for emissions stack testing. For one pelletizing line provide a detailed process gas flow diagram showing the process gases going to the vents/stacks.

3. In Application Section II, Emissions Unit Information, Section [3], Pelletizing Line Nos. 1, 2, and 3, Attachment GC-EU3-13, Detailed Description of Control Equipment, Geelen Counterflow Company, Model CY 1600 HE Cyclone Separators were identified as high efficiency cyclones having PM_{10} removal efficiency greater than 90%. Provide documentation from the manufacturer to support the cyclone efficiencies.

Professional Engineer (P.E.) Certification Statement: Rule 62-4.050(3), F.A.C., requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, at a minimum your response to Item(s) [insert number(s)] above should be certified by a professional engineer registered in the State of Florida. Please complete and submit a new P.E. certification statement page from the application form, DEP Form No. 62-210.900(1), effective March 11, 2010 (enclosed).

When referring to this project, please use the file number indicated above. The Department must receive a response from you within 30 days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)5., F.A.C.

If you have any questions, please contact Rick Prusa at 850/595-0634 or e-mail rick.prusa@dep.state.fl.us.

Sincerely,

/s/

Rick Bradburn
Air Program Administrator

RB/rp/c

Enclosure
c: Mr. Scott A. McCann, P.E.; Golder Associates: scott_mccann@golder.com
DEP Northwest District Branch Office, Panama City