

## FULL COMPLIANCE EVALUATION (FCE) CHECKLIST

ARMS ID 0610096	OWNER/COMPANY INEOS New Planet Bioenergy	SITE NAME INEOS New Planet Bioenergy Vero Beach Facility
<input checked="" type="checkbox"/> TITLE V	<input type="checkbox"/> SYNTHETIC MINOR (Emissions limited to $\geq 80\%$ and $< 100\%$ of major source thresholds)	DATE OF THIS FCE: 01 / 21 / 2014 <input checked="" type="checkbox"/> ON-SITE ASSESSMENT <input type="checkbox"/> OFF-SITE ASSESSMENT (Explain reason for Off-Site in 'Comments')
<input type="checkbox"/> TITLE V MEGA-SITE*	<input type="checkbox"/> OTHER:	DATE OF PREVIOUS FCE: None

\*Facility with a large number of complex emissions units. It is more reasonable to evaluate a Title V Mega-Site once every 3 years instead of once every 2 years.

### REVIEW OF ALL REQUIRED REPORTS

PERIODIC REPORTS	COMMENTS
<input checked="" type="checkbox"/> DONE <input type="checkbox"/> N/A Annual Operating	Paper AOR for 2010 Listed in AOR Submittal Search. None found in electronic files or OCULUS.
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Annual Statement of Compliance – Title V	Official Start Date was July 2013. In operation less than one year. Still Under Construction Permit
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Title V Semi-Annual Monitoring	Still Under Construction Permit
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Semi-Annual Compliance	
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Quarterly Compliance	
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Stack Test	Observing First Stack Tests on 1-21-2014
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Visible Emissions Test	
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Other:	

CONTINUOUS EMISSION MONITOR REPORTS	COMMENTS
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Quarterly excess emissions	
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A Semi-annual	
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A RATA	
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A CGA	
<input checked="" type="checkbox"/> DONE <input type="checkbox"/> N/A Monthly Operations Summary :	While at the site, we requested that they show us the Monthly Operations Summary which is required in Section III Item 9 of the Construction Permit 0610096-004-AC. The facility had all of the data collected in their computerized data system, but the summary reports had not been compiled from the data, although some work had been done on it. They provided the attached two sets of data on 1-21-2014, and promised to get the actual monthly summary report sent to us promptly. We received a report on 2-6-2014. The running annual totals for

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		the facility were calculated starting July 2014 since that was their official start date. Diesel fuel use in the report was getting close to their limit, although the total included the exempt diesel used in off-road equipment, as well as the non-exempt equipment. They are working to separate the numbers and will send an updated Operations Summary as soon as they get it ready.
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A	Other :	

### OBSERVATIONS AND RECORDS REVIEW

OBSERVATIONS AND RECORDS	COMMENTS	
<input checked="" type="checkbox"/> DONE <input type="checkbox"/> N/A	Visible emission observation(s) <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 5px;"> <tr> <td style="width: 50%;">Did not observe visible emissions from the Emission Units.</td> </tr> </table>	Did not observe visible emissions from the Emission Units.
Did not observe visible emissions from the Emission Units.		
<input checked="" type="checkbox"/> DONE <input type="checkbox"/> N/A	Review of facility records and logs <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 5px;"> <tr> <td style="width: 50%;">See Above discussion of the Monthly Operations Summary</td> </tr> </table>	See Above discussion of the Monthly Operations Summary
See Above discussion of the Monthly Operations Summary		
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A	Assessment of process parameters (feed rates, process rates, raw material compositions, etc.)	
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A	Assessment of control equipment performance parameters (water flow rates, pressure drops, temperatures, ESP power levels, etc.)	
<input checked="" type="checkbox"/> DONE <input type="checkbox"/> N/A	Stack test observation(s) <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 5px;"> <tr> <td style="width: 50%;">Observed the Initial Stack Tests on 1-21-2014</td> </tr> </table>	Observed the Initial Stack Tests on 1-21-2014
Observed the Initial Stack Tests on 1-21-2014		
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A	Other :	
<input type="checkbox"/> DONE <input checked="" type="checkbox"/> N/A	Other :	

### INSPECTION REPORTS (COMPLIANCE MONITORING REPORTS)

DATE OF INSPECTION	DATE OF INSPECTION REPORT	FULL/PARTIAL (F OR P)	INVESTIGATIVE (YES OR NO)	LOCATION OF INSPECTION REPORT REQUIRED ELEMENTS:					
				FACILITY INFO	APPLICABLE REQUIREMENTS	LIST OF EUS	ENFORCEMENT HISTORY	COMPLIANCE ACTIVITIES	FINDINGS & RECOMMENDATIONS
01-21-2014	02-10-2014	F	N	<input checked="" type="checkbox"/> EASIIR/ARMS/APDS	<input checked="" type="checkbox"/> EASIIR/ARMS/APDS	<input checked="" type="checkbox"/> EASIIR/ARMS/APDS	<input checked="" type="checkbox"/> EASIIR/ARMS/ACES	<input checked="" type="checkbox"/> EASIIR/ARMS/ACES	<input checked="" type="checkbox"/> EASIIR/ARMS/ACES
				<input type="checkbox"/> Paper Files	<input type="checkbox"/> Paper Files	<input type="checkbox"/> Paper Files	<input type="checkbox"/> Paper Files	<input type="checkbox"/> Paper Files	<input type="checkbox"/> Paper Files
				<input type="checkbox"/> EASIIR/ARMS/APDS	<input type="checkbox"/> EASIIR/ARMS/APDS	<input type="checkbox"/> EASIIR/ARMS/APDS	<input type="checkbox"/> EASIIR/ARMS/ACES	<input type="checkbox"/> EASIIR/ARMS/ACES	<input type="checkbox"/> EASIIR/ARMS/ACES
				<input type="checkbox"/> Paper Files	<input type="checkbox"/> Paper Files	<input type="checkbox"/> Paper Files	<input type="checkbox"/> Paper Files	<input type="checkbox"/> Paper Files	<input type="checkbox"/> Paper Files

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				<input type="checkbox"/> EASIIR/ ARMS/ APDS	<input type="checkbox"/> EASIIR/ARMS/ APDS	<input type="checkbox"/> EASIIR/ ARMS/ APDS	<input type="checkbox"/> EASIIR/ARMS/ ACES	<input type="checkbox"/> EASIIR/ARMS/ ACES	<input type="checkbox"/> EASIIR/ARMS/ ACES
				<input type="checkbox"/> Paper Files	<input type="checkbox"/> Paper Files	<input type="checkbox"/> Paper Files	<input type="checkbox"/> Paper Files	<input type="checkbox"/> Paper Files	<input type="checkbox"/> Paper Files

In-house tools with electronic report generation features: ARMS (Air Resource Management System) database; and EASIIR (Electronic Access System for Inspection Information Retrieval)

Internet-accessible information: ACES (Air Compliance and Enforcement Search); and APDS (Air Permit Documents Search)

## COMMENTS

See checklist above for reports previously submitted to the Department. The inspection followed a site safety meeting and discussion of their current operating conditions. No cameras were allowed to be used at the site due to confidential equipment and technics used at the site.

The site is running in an alternative manner in order to test process changes: The incoming ground yard waste is being processed through both the train 1 and train 2 dryers in order to further dry the incoming biomatter. Therefore, only one gasification unit was in operation. Because of this, they did not have enough syngas to run the vent gas boiler at 90% of the design capacity without supplementing with natural gas. Since the use of natural gas would in effect dilute the any pollutants in the combustion products, it was decided that the Department would allow them to run the stack testing at less than 90% of design capacity and not limit them in the future due to this fact.

Another thing that came to light in the meeting was that not all of the EU001 "Materials Handling Area" are actually being conducted in the small materials handling area. Vegetative Waste shredding is being conducted on site, but not necessarily in the originally designated Materials Handling area. The facility also let it be known that they are not currently able to keep diesel fuel use by the shredders and material handling equipment in the materials handling area separate from the diesel fuel used by the various exempt off-road mobile equipment being used at the site. Therefore, diesel fuel use will appear high.

A tour of the facility was conducted, and none of the emissions units that were operating (there was no product loading being conducted, so the product load-out flare was not in operation) were producing visible emissions in excess of 5%, in fact, all appeared to be 0% with the exception of the exempt mobile off road equipment. (bulldozers etc.)

Coastal Air Consulting was on site conducting the initial compliance stack testing of EU002 (Feedstock Dryers #1 and #2) and EU006 (Vent Gas Boiler) according to the Test Protocol that was sent to the Department prior to the test date (see attached). No problems were observed with the stack testing except for delays due to obtaining sufficient electrical power for the equipment. No other air emissions exceedances or violations were observed during the inspection.

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Prepared by: Scott D. Trainor

Date: 02-11-2014

Reviewed by: Lee Hoefert

Date: 02-11-2014