

## Young, Michael

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**From:** Kuberski, Garry  
**Sent:** Thursday, December 20, 2012 10:11 AM  
**To:** Young, Michael  
**Subject:** FW: MaxWest Stack Test  
**Attachments:** Sept 28 Letter to FDEP.pdf

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**From:** Bruno Ferraro [<mailto:bruno@grovescientific.com>]  
**Sent:** Thursday, December 20, 2012 9:06 AM  
**To:** Shine, Caroline  
**Cc:** Kuberski, Garry; Sara Greivell; Paul Cairney  
**Subject:** MaxWest Stack Test

Good Morning Caroline,

Yesterday at around 11:37 am at the stack test for MaxWest, we experienced a failure of the stack oxygen sensor and had to shut down the gasifier. This oxygen sensor is the instrument that controls the process fans and the oxygen levels in the gasifier. MaxWest is currently conducting a failure analysis to determine the cause of the oxygen sensor failure, what is needed to repair or replace this instrument and how to prevent the same failure in the future. This will likely take several weeks to complete due to the holidays and the gasifier is down until further notice.

Once this has been corrected we will re-schedule the stack test. Grove and our test crew has a very busy January schedule but we will do the best we can to fit this test in. It could take to the end of January or even early February based on my current commitments. As you know schedules in our business change daily, so if a cancellation happens that allows us to move this test up, we will do so. Of course we are also dependent on when the problem is corrected at the plant and when your staff is available.

Regarding permit 1170409-003-AC that states a "test report shall be file no later than 12-31-12", this will not happen. In the letter September 28, 2012 from Paul Cairney (copy attached), we stated we would test by 12-31-12, not that the report will be submitted by this date. In that letter we committed to testing in mid-December, which we attempted yesterday. With metals and D/F, the lab takes at least 35 days to complete the chemistry analyses. I hope you agree that this is a typo in the updated permit.

Please give me a call if you wish to discuss this further. As soon as we have the failure analysis completed and a solution to the problem, MaxWest will contact you with an update and a proposed test date. I suspect, this will be after the new year. In the meantime, you may also contact Paul Cairney 407-328-4992 at MaxWest.

Thank-you

*Bruno A. Ferraro, CEP, QEP*

*President*

*Grove Scientific & Engineering*

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American Society of Testing and Materials ([www.astm.org](http://www.astm.org))

Council of Engineering and Scientific Specialty Boards ([www.cesb.org](http://www.cesb.org))

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September 28, 2012

Caroline Shine, Program Administrator  
Air Resource Management  
FDEP, Central District  
3319 Maguire Boulevard, Suite 232  
Orlando, Florida 32803

**RE: Permit No. 1170409-002-AC  
Request for Changes to Permit Due Dates**

Dear Ms. Shine,

Since May 2012 MaxWest Environmental has been working on the final design and modifications to the gasifier located in Sandford. Though we have run the gasifier a few times since the May startup, it has been to test the modifications and to determine what other changes need to be made to finalize the design. The ongoing work has included changing the mechanical systems that allow us to control the oxygen levels throughout the system, changes to the controls, modifications to the scrubber and lastly, changes that will better control particulate matter carryover that is impacting the heat exchanger.

We expect the latest modifications to the gasifier to be completed no later than November 15, 2012 at which time we hope to put it into regular production. Once this happens we will schedule the compliance test with Grove Scientific & Engineering Company and your staff.

We are requesting several changes to allow us to complete our startup. They are;

1. Extend the date that the compliance test is due to December 31, 2012. Our plan is to test in mid-December.
2. Extend the date that the Title V Permit application must be submitted to March 31, 2013.
3. Extend the expiration date of the referenced construction permit to November 30, 2013.

We have attached the application fee of \$50.00 for the processing of this request. Please call me if you have any questions regarding this request.

Sincerely,

MaxWest Environmental Systems Inc.,

A handwritten signature in blue ink, appearing to read "Paul Cairney", is written over a faint, larger version of the signature.

*Paul Cairney*

**Chief Operating Officer**

**MaxWest Environmental Systems Inc.**

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cc: Bruno Ferraro, CEP, QEP