



Environmental Consulting & Technology, Inc.

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AIR REGULATION

June 17, 2010

Mr. A.A. Linero
Program Administrator, Special Projects Section
Florida Department of Environmental Protection
Division of Air Resource Management
111 South Magnolia Drive, Suite 23
Tallahassee, FL 32301

**Re: Gainesville Regional Utilities
Deerhaven Generating Station
Request for Unit 2 Annual Emission Caps**

Dear Mr. Linero:

The City of Gainesville, Gainesville Regional Utilities (GRU) requests annual emission caps for nitrogen oxides (NO_x) and sulfur dioxide (SO₂) at our Deerhaven Generating Station (DGS) Unit 2 located at 100001 Northwest 13th Street in Gainesville, Alachua County. The reason for this request is to ensure that there will be no increases in actual emissions of these two air pollutants following commencement of commercial operation of the proposed Gainesville Renewable Energy Center (GREC) biomass-fired power plant.

Attachment A to this letter provides a monthly summary of DGS Unit 2 baseline actual NO_x and SO₂ emission rates for the five-year period beginning June 2005 and ending May 2010, GREC project potential NO_x and SO₂ emission rates, and the net change in actual emissions following commencement of commercial operation of the GREC project and implementation of the DGS Unit 2 emission caps. The requested DGS Unit 2 NO_x and SO₂ annual emission caps of 3,381.1 and 8,005.0 tons per year, respectively, will ensure that there will be no increases in actual emissions; i.e., the net change in NO_x and SO₂ emissions will each be zero.

On behalf of GRU, four copies of the administrative and signature pages of the Department's *Application for Air Permit - Long Form* (DEP Form No. 62-210.900(1), Effective 3/11/2010) are provided as Attachment B.

GRU would appreciate your expeditious processing of this air construction permit application. If you have any questions, please contact Rob Klemans by phone at (352) 393-1283, by e-mail at klemansrw@gru.com.

Sincerely,

ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.

Thomas W. Davis, P.E.
Principal Engineer

Attachments

3701 Northwest
98th Street
Gainesville, FL
32606

(352)
332-0444

FAX (352)
332-6722

ATTACHMENT A

**DGS UNIT 2 AND GREC
EMISSION DATA**

Table A-1. GRU DGS Unit 2 Emission Caps

A. GRU DGS Unit 2 Baseline Actual Emissions (BAE)

Line No.	24-Month Period	Annual Actual Emissions		Comments
		NO _x (ton/yr)	SO ₂ (ton/yr)	
1	5-Year Look-Back Period: June 2005 - June 2010 March 2006 - February 2008	3,799.2		CEMS Data From Table A-2
2	July 2006 - June 2008		8,175.7	CEMS Data From Table A-2

B. GREC Potential Emissions (PTE)

Line No.	Emission Source	Annual Potential Emissions		Comments
		NO _x (ton/yr)	SO ₂ (ton/yr)	
3	BFB Boiler	416.4	170.7	
4	Emergency Generator Diesel Engine	1.4	0.0078	
5	Emergency Firewater Pump Diesel Engine	0.3	0.0031	
6	Totals	418.1	170.7	Line 3 + Line 4 + Line 5

C. GRU DGS Unit 2 Emission Caps

Line No.	Item	Annual Allowable Emissions		Comments
		NO _x (ton/yr)	SO ₂ (ton/yr)	
7	GRU DGS Unit 2 NO_x Emission Cap	3,381.1		Line 1 - Line 6
8	Net Change in NO_x Emissions	0.0		(Line 7 - Line 1) + Line 6
9	GRU DGS Unit 2 SO₂ Emission Cap		8,005.0	Line 2 - Line 6
10	Net Change in SO₂ Emissions		0.0	(Line 9 - Line 2) + Line 6

CEMS - Continuous Emissions Monitoring System

Sources: ECT, 2010.

EPA Clean Air Markets Website, 2010.

GRU, 2010.

Table A-2. GRU DGS Unit 2 CEMS Data

Year	Month	NO _x		SO ₂	
		Monthly Total (tons)	Rolling 24-Month Annual Average (ton/yr)	Monthly Total (tons)	Rolling 12-Month Annual Average (ton/yr)
2005	Jun	315.4		627.6	
	Jul	367.7		737.3	
	Aug	381.6		764.0	
	Sep	374.8		764.7	
	Oct	286.1		590.7	
	Nov	318.3		675.0	
2006	Dec	317.3		656.6	
	Jan	273.1		578.9	
	Feb	321.0		707.8	
	Mar	274.2		580.1	
	Apr	10.1		25.7	
	May	327.9		675.8	
	Jun	288.9		577.6	
	Jul	438.9		883.3	
	Aug	435.9		924.3	
	Sep	364.8		814.5	
	Oct	372.8		854.8	
	Nov	357.1		737.5	
2007	Dec	352.7		759.0	
	Jan	372.5		759.0	
	Feb	337.2		688.4	
	Mar	257.0		542.1	
	Apr	89.7		208.4	
	May	304.1	3,769.6	673.9	7,903.5
	Jun	338.0	3,780.9	741.1	7,960.2
	Jul	322.4	3,758.2	684.7	7,933.9
	Aug	405.4	3,770.2	864.1	7,984.0
	Sep	257.4	3,711.5	568.9	7,886.1
	Oct	268.6	3,702.8	623.5	7,902.5
	Nov	359.9	3,723.6	773.4	7,951.7
2008	Dec	312.5	3,721.2	709.6	7,978.2
	Jan	396.9	3,783.1	874.7	8,126.1
	Feb	353.3	3,799.2	798.6	8,171.4
	Mar	80.5	3,702.3	192.5	7,977.6
	Apr	91.3	3,742.9	192.8	8,061.2
	May	377.0	3,767.5	834.4	8,140.5
	Jun	290.0	3,768.0	648.0	8,175.7
	Jul	339.4	3,718.3	763.4	8,115.8
	Aug	341.0	3,670.8	804.2	8,055.7
	Sep	304.3	3,640.6	693.0	7,994.9
	Oct	295.8	3,602.1	637.3	7,886.2
	Nov	240.3	3,543.7	549.3	7,792.1
2009	Dec	253.0	3,493.8	586.0	7,705.6
	Jan	298.9	3,457.0	711.6	7,681.9
	Feb	305.9	3,441.3	708.4	7,691.8
	Mar	132.4	3,379.0	298.5	7,570.1
	Apr	0.0	3,334.2	0.0	7,465.9
	May	135.4	3,249.8	640.1	7,449.0
	Jun	61.3	3,111.5	717.5	7,437.2
	Jul	84.1	2,992.3	690.0	7,439.8
	Aug	78.7	2,829.0	682.4	7,349.0
	Sep	75.4	2,738.0	435.9	7,282.5
	Oct	47.9	2,627.6	188.9	7,065.2
	Nov	33.8	2,464.5	320.4	6,838.8
2010	Dec	47.6	2,332.0	388.1	6,678.0
	Jan	52.5	2,159.8	251.6	6,366.4
	Feb	35.7	2,001.0	201.3	6,067.8
	Mar	39.6	1,980.6	235.8	6,089.4
	Apr	11.7	1,940.8	56.9	6,021.5
	May	48.8	1,776.7	162.8	5,685.7
		Maximums	3,799.2		8,175.7

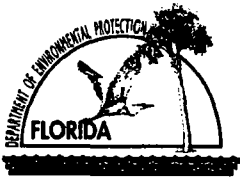
CEMS - Continuous Emissions Monitoring System

Sources: ECT, 2010.
 EPA Clean Air Markets Website, 2010.
 GRU, 2010.

ATTACHMENT B

**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

APPLICATION FOR AIR PERMIT – LONG FORM



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: City of Gainesville, GRU	
2. Site Name: Deerhaven Generating Station	
3. Facility Identification Number: 0010006	
4. Facility Location... Street Address or Other Locator: 10001 NW 13th Street City: Gainesville County: Alachua Zip Code: 32653	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Robert W. Klemans, P.E., Supervising Utility Engineer	
2. Application Contact Mailing Address... Organization/Firm: City of Gainesville, GRU Street Address: P.O. Box 147117 (A136) City: Gainesville State: FL Zip Code: 32614-7117	
3. Application Contact Telephone Numbers... Telephone: (352) 393-1283 ext. Fax: (352) 334-3151	
4. Application Contact Email Address: klemansrw@gru.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	3. PSD Number (if applicable):
2. Project Number(s):	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

Application is a request for nitrogen oxides (NO_x) and sulfur dioxide (SO₂) emission caps for Deerhaven Generating Station Unit 2 to ensure that there will be no increases in actual emissions of these two air pollutants following commencement of commercial operation of the proposed Gainesville Renewable Energy Center (GREC) biomass-fired power plant.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
005	2,428 MMBtu/hr Steam Boiler No. 2	N/A	N/A

Application Processing Fee

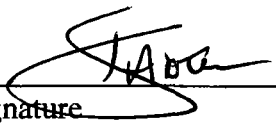
Check one: Attached - Amount: \$ _____ Not Applicable

**The Deerhaven Generating Station has been issued a Title V air operation permit.
Application processing fee not required pursuant to Rule 62-4.050(4)(a)2., F.A.C.**

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : John W. Stanton, Assistant General Manager – Energy Supply
2. Owner/Authorized Representative Mailing Address... Organization/Firm: City of Gainesville, GRU Street Address: P.O. Box 147117 (A132) City: Gainesville State: FL Zip Code: 32614-7117
3. Owner/Authorized Representative Telephone Numbers... Telephone: (352) 393-1789 ext. Fax: (352) 334-2786
4. Owner/Authorized Representative Email Address: stantonjw@gru.com
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i>  _____ Signature 6-17-10 _____ Date

APPLICATION INFORMATION

Application Responsible Official Certification

NOT APPLICABLE

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name:
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source or CAIR source.
3. Application Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
4. Application Responsible Official Telephone Numbers... Telephone: () ext. Fax: ()
5. Application Responsible Official E-mail Address:
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i> _____ Signature _____ Date

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Thomas W. Davis Registration Number: 36777
2. Professional Engineer Mailing Address... Organization/Firm: Environmental Consulting & Technology, Inc. Street Address: 3701 Northwest 98th Street City: Gainesville State: Florida Zip Code: 32606-5004
3. Professional Engineer Telephone Numbers... Telephone: (352) 248 - 3351 ext. Fax: (352) 332 - 6722
4. Professional Engineer Email Address: tdavis@ectinc.com

5. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) *To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and*

(2) *To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.*

(3) *If the purpose of this application is to obtain a Title V air operation permit (check here , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.*

(4) *If the purpose of this application is to obtain an air construction permit (check here , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.*

(5) *If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.*

No. 36777 Signature Thomas W. Davis Date 6/17/10
Signature STATE OF (seal)
PROFESSIONAL ENGINEER

Attach any exceptions to certification statement.