

Walker, Elizabeth (AIR)

From: Linero, Alvaro
Sent: Monday, March 15, 2010 4:22 PM
To: jgordon@amrenewables.com
Cc: jlevine@amrenewables.com; tdavis@ectinc.com; forney.kathleen@epa.gov; abrams.heather@epa.gov; catherine_collins@fws.gov; Kirts, Christopher; Dalton, Jessica; bettyjohnson@shareinet.net; diandv@bellsouth.net; hopeforcleanwater@yahoo.com; rprtcard@bellsouth.net; Walker, Elizabeth (AIR); Nelson, Deborah
Subject: RE: Gainesville Regional Energy Center PSD Permit Application
Attachments: RAI03152010.pdf

Dear Mr. Gordon:

Please read the attached letter as it relates to the air construction (PSD) permit application filed by you for the Gainesville Renewable Energy Center in Gainesville, Alachua County.

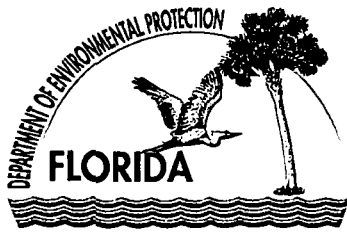
If you have any questions, please call me at 850-921-9523 or David Read at 850-414-7268.

Thank you.

alvaro.linero@dep.state.fl.us

Alvaro Linero, P.E., Program Administrator
Bureau of Air Regulation
Special Projects Section
State of Florida DEP
850-921-9523

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor
Jeff Kottkamp
Lt. Governor
Michael W. Sole
Secretary

March 15, 2010

Electronically Sent – Received Receipt Requested

jgordon@amrenewables.com

Mr. James S. Gordon, Chief Executive Officer
Gainesville Renewable Energy Center (GREC), LLC
75 Arlington Street, 7th Floor
Boston, Massachusetts 02116

Re: Second Request for Additional Information
DEP File Number: 0010131-001-AC (PSD-FL-411)
100 Megawatt (MW) Biomass-Based Electrical Generating Power Plant

Dear Mr. Gordon:

The Department received the your response to our first RAI regarding the application to construct the GREC; a nominal 100 MW Biomass-fueled power plant to be built on land leased from the City of Gainesville at the Deerhaven power plant owned by the Gainesville Regional Utilities (GRU) in Alachua County, Florida.

Pursuant to Rule 62-4.055(1), Florida Administrative Code (F.A.C.), the Department reviewed the RAI response and requests submittal of the following additional information. We have had continuing discussions with your consultant about these matters, some of which involve the participation of EPA Region 4 staff. Most recently we summarized the status by electronic mail dated March 6, 2010. This letter is to highlight and formalize the additional requests.

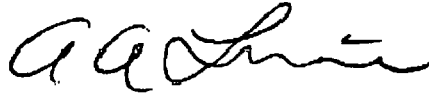
1. Additional Modeling related to Nitrogen Dioxide (NO₂): On January 22, 2010 (after issuance of our first RAI) EPA signed into law a new National Ambient Air Quality Standard (NAAQS) for NO₂. The new standard is a 1-hr standard set at the level of 100 parts per billion (ppb). The effective date of the new NAAQS will be April 12, 2010. Because the final action on the application will not occur by the time the new NAAQS is effective, GREC, LLC will need to provide the appropriate air quality analysis to complete the application.
2. Additional Modeling related to Particulate Matter (PM₁₀): We advised earlier by electronic mail on or about February 26, 2010 that additional modeling is required for PM₁₀ due to relocation or orientation of fugitive sources associated with the project.
3. PM₁₀ as a surrogate for fine PM or PM_{2.5}: It is necessary to address the appropriateness of the PM₁₀ BACT proposal as a substitute for a BACT analysis of PM_{2.5} emissions. This can be done by demonstrating that the PM₁₀ surrogate policy is appropriate for this project and explain the current technical difficulties that make PM_{2.5} NAAQS compliance modeling infeasible. Alternatively, perform a PM_{2.5} NAAQS compliance analysis following accepted procedures that include representative ambient background concentration. Some guidance from EPA will be forthcoming.

We have had discussions with EPA Region 4 about the project and they have advised us that they will submit their comments on the application shortly.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C., requires that all applications for a construction 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. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official. Rule 62-4.055(1), F.A.C., also requires applicants to respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information.

If you have any questions, please contact David Read (permit engineer) at david.read@dep.state.fl.us and 850/414-7268 or Deborah Nelson (modeling analyst) deborah.nelson@dep.state.fl.us and 850-294-3870.

Sincerely,



A.A. Linero, Program Administrator
Special Projects Section

AAL/dlr

Cc: Joshua H. Levine, American Renewables, LLC: jlevine@americanrenewables.com
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