



Environmental Consulting & Technology, Inc.

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BUREAU OF
AIR REGULATION

Ms. Trina L. Vielhauer
Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
Division of Air Resource Management
111 South Magnolia Drive, Suite 4
Tallahassee, FL 32301

**Re: Gainesville Renewable Energy Center
DEP File No. 0010131-001-AC (PSD-FL-411)
Comments on Draft Air Construction Permit**

Dear Ms. Vielhauer:

On July 14, 2010 the Department issued a draft air construction permit for the proposed Gainesville Renewable Energy Center woody biomass-fuel power project. On behalf of Gainesville Renewable Energy Center, LCC, we would appreciate your review of the following requested changes to the draft air construction permit conditions:

1. Page 7 of 27: Condition No. 11 – Unconfined Emissions of Particulate Matter

Change “owner or operator” to “permittee” as follows:

... d. Removal of particulate matter from roads and other paved areas under the control of the permittee ~~owner or operator~~ of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulates from becoming airborne;...

2. Page 14 of 27: Condition No. 9 – Emission Limits

Change 24-hour averaging for NO_x and SO₂ from 24-hour rolling to 24-hour block averages.

3. Page 15 of 27: Condition No. 11 – PM Emission Standard

Delete reference to 7% O₂ as follows:

“PM emissions from bin vent filter of the alkaline sorbent storage silo shall not exceed 0.01 gr/dscf @ 7% O₂”.

4. Page 16 of 27: Condition No. 14 – Malfunction Notification

Change “owner or operator” to “permittee” as follows:

14. Malfunction Notifications: In case of excess emissions resulting from malfunctions, the permittee ~~each owner or operator~~ shall notify the Compliance Authority. If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of

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equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately (within one working day) notify the Compliance Authority. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the permittee's owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules. If requested by the Compliance Authority, the permittee owner or operator shall submit a quarterly written report describing the malfunction. [Rules 62-210.700(6) and 62-4.130, F.A.C.]

5. Page 18 of 27: Condition No. 20 – Test Methods

For sulfuric acid mist, add the ASTM International Standard WK22846 test method as an alternative test method to EPA Method 8.

Please contact Josh Levine at (617) 482-6150 (jlevine@amrenewables.com) or me at (352) 248-3351 (tdavis@ectinc.com) if you have any questions regarding the requested changes to draft air construction permit No. 0010131-001-AC (PSD-FL-411).

Sincerely,



Thomas W. Davis, P.E.
Principal Engineer

TWD:tw

cc: Josh Levine, American Renewables