

Brevard Energy, LLC
29261 Wall Street, MJ 48393

September 19, 2008

Mr. Syed Arif, P.E.
Bureau of Air Regulation
Division of Air Resource Management
Department of Environmental Protection
STATE OF FLORIDA
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

RECEIVED

SEP 25 2008

BUREAU OF AIR REGULATION

Subject: Brevard Energy, LLC *606-AC*
DEP File No. 090069-~~004~~-AC (PSD-FL-378)
Request to resume permit application review process

Dear Mr. Arif:

Brevard Energy, LLC (Brevard Energy) has prepared this document to request that the Florida Department of Environmental Protection, Division of Air Resource Management (FDEP-DARM) resume its review of the air permit application that was submitted to the regulatory agency during November 2007. This permit application requests that modifications/revisions be made to the sulfur dioxide (SO₂) emission rate limits that are specified in Permit No. 090069-004-AC (PSD-FL-378), which allows for the construction and operation of landfill gas (LFG) fueled reciprocating internal combustion engine - generator sets at Brevard Energy.

Documents were submitted to the FDEP -DARM in May 2008 that requested the permit application review process be temporarily stopped in order to allow Brevard Energy time to adequately perform additional LFG sulfur content measurements to determine the presence (or absence) of increasing amounts sulfur its fuel supply.

The FDEP-DARM, based on the results of the periodic LFG fuel sulfur content monitoring performed during July and August 2008 by Brevard Energy, has provided information that indicates it plans to issue permit conditions to Brevard Energy that allow for the combined IC engine operations to emit a maximum of 69.3 tons per year of SO₂ provided the:

- LFG fuel sulfur content is monitored on a continuous basis using instrumentation acceptable to FDEP-DARM; and
- Potential annual SO₂ emissions are calculated on a regular basis using data obtained from the continuous sulfur monitoring instrument.

Based on the information discussed with the FDEP-DARM, Brevard Energy requests that the regulatory agency proceed with the completion of its permit review process that will incorporate the specified SO₂ LFG fuel monitoring and emissions rate calculation

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Mr. Syed Arif
FDEP-DARM

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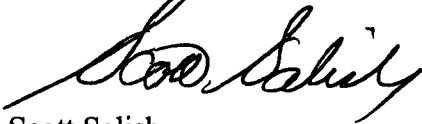
requirements.

We look forward to reviewing draft conditions for the requested permit modifications.

Please contact us or our authorized agent (Derenzo and Associates, Inc.) if you have any questions regarding this correspondence.

Sincerely,

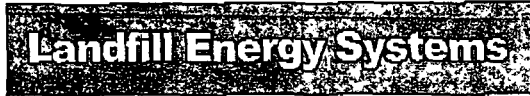
BREVARD ENERGY, LLC



Scott Salisbury
Managing Member/Secondary Responsible Official

cc: Bill Owen, Landfill Energy Systems
Mike Laframboise, Landfill Energy Systems

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Fax

To: Mr. Syed Arif, P.E.	From: Scott Salisbury
Fax: 850-922-6979	Pages: 2 (including cover)
Phone: 850-921-9528	Date: 05/28/08
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Brevard Energy, LLC
29261 Wall Street, NJ 48393

May 27, 2008

Mr. Syed Arif, P.E.
Bureau of Air Regulation
Division of Air Resource Management
Department of Environmental Protection
STATE OF FLORIDA
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399-2400

Subject: Brevard Energy, LLC
DEP File No. 090069-004-AC (PSD-FL-378)
Request for temporary stoppage of permit application review process

Dear Mr. Arif:

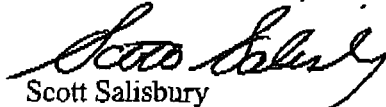
Brevard Energy, LLC (Brevard Energy) has prepared this document to request that the Florida Department of Environmental Protection, Division of Air Resource Management (FDEP-DARM) temporarily stop its review of the air permit application, which was submitted to the regulatory agency in late 2007, that requests revisions to sulfur dioxide (SO₂) emission rate limits for its landfill gas (LFG) fueled IC engine operations.

The four (4) LFG sulfur content measurements that were required by conditions of air permit no. PSD-FL-378 and performed over the previous 15 month period do not provide a sufficient amount of data on which to accurately determine the potential amount of sulfur that is (and will be) present in the LFG generated by the Brevard County SWM Central Disposal Facility. Therefore, Brevard Energy plans to obtain additional LFG sulfur content measurements in order to establish a more accurate longer-term average and range of concentrations; and presence (or absence) of increasing sulfur content trends. The specified analyses will be completed within a six month period.

Brevard Energy representatives will maintain appropriate periodic communications with the FDEP-DARM to provide details on the LFG sulfur content measurements (measurement procedures, LFG sampling frequency and analytical results) and regulatory considerations for finalizing the permit application review process.

Sincerely,

BREVARD ENERGY, LLC



Scott Salisbury
Managing Member/Secondary Responsible Official

c: Bill Owen, Landfill Energy Systems
Mike Laframboise, Landfill Energy Systems

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