



ADAGE

An AREVA/Duke Energy
advanced biopower company

RECEIVED

MAR 10 2010

BUREAU OF AIR REGULATION

March 4, 2010

Via Electronic Mail and U.S. Mail

Florida Department of Environmental Protection
Bureau of Air Regulation, Division of Air Resource Management
2600 Blair Stone Road, M.S. 5500
Tallahassee, FL 32399-2400

Attention: Mr. Alvaro Linero, Director of Special Projects
(alvaro.linero@dep.state.fl.us)

**RE: Supplement Request No. 01 – 030410 – Submission of Additional
Information
Application for ADAGE Gadsden LLC - Air Construction Permit
Proposed Nominal 55.5 MW Net Woody Biomass Electric Power Plant
Gadsden County, Florida**

Dear Mr. Linero:

ADAGE Gadsden LLC (ADAGE) submitted an application for an air construction permit to the Florida Department of Environmental Protection, Bureau of Air Regulation, Division of Air Resource Management (Bureau) dated January 27, 2010 for the construction of a proposed nominal 55.5 MW Net Woody Biomass Electric Power Plant to be located in Gadsden County, Florida. The Bureau has requested from ADAGE some additional information related to this proposed project in order to initiate its technical review of ADAGE's air construction permit application.

ADAGE, the applicant, hereby submits additional information (referred to as Supplement #01-030410) to support the information provided in the initial air construction permit application dated January 27, 2010. The information provided specifically pertains to updated technical information defined as necessary by the Bureau to complete its technical review of the air permit application. The specific technical information being submitted to the Bureau is addressed below:

Item #1 – Clarification of the Ultra Low Sulfur fuel oil storage tanks to be utilized at the plant.

The storage tanks to be utilized are listed below. The capacity of the tanks will be at or below those listed below:

225 Wilmington West Chester Pike Suite 302
Chadds Ford, PA 19317

- 50,000 gallon capacity above ground storage tank to support the BFB boilers during startup, shutdown and bed stabilization events.
- 1,000 gallon capacity or less above ground storage tank to support the emergency generator engine. The tank will be part of the skid mounted design of the emergency generator equipment.
- 1,000 gallon capacity or less above ground storage tank to support the emergency fire pump engine. The tank will be part of the skid mounted design of the emergency fire pump equipment.
- 1,000 gallon capacity or less above ground storage tank to support the portable chipper. The tank will be part of the equipment design of the portable chipper.

Item #2 – Opacity Limitation for the BFB Boiler during startup, shutdown and bed stabilization events.

During these events ADAGE is proposing a limitation of 20% opacity. This limit is provided on page 8-8 of the initial application and is consistent with the limit established for ADAGE Hamilton LLC.

Item #3 – Update to Table 2-1

Table 2-1 provided in the original application is being updated to reflect controlled emissions of regulated air pollutants from the proposed plant. A revised Table 2-1 is attached to this letter.

By submission of this additional information (i.e., supplement to the air construction permit application), ADAGE believes we have provided the Bureau with the information it requires to 1) initiate the process of performing its detailed technical review of all the information submitted by ADAGE and 2) after that review begin drafting of the construction permit that will allow construction of the air pollutant emissions source associated with the proposed 55.5 MW Net Woody Biomass Electric Power Plant.

ADAGE is committed to supporting the Bureau with their permitting effort and will be available to answer any additional questions that may arise or to provide technical data that might be required by the Bureau during the technical review and permit drafting stage of the air permitting process.

Included with this submittal is the following information:

- Updated Table 2-1 “Summary of Worst Case Potential to Emit Regulated New Source Review (NSR) Air Pollutants and NSR Regulatory Applicability”; and
- Completed DEP Form No. 62-210.900 (1) – Professional Engineer Certification.

Should you have any questions, please do not hesitate to contact Ms. Vanessa Goff at ADAGE at (585)-239-7607. We look forward to continuing working with the Bureau on issuance of a construction permit for the proposed plant.

Very truly yours,

ADAGE Gadsden LLC

A handwritten signature in black ink, appearing to be 'F. Reed Wills', with a long horizontal stroke extending to the right.

F. Reed Wills
President

Table 2-1
Summary of Worst Case Potential to Emit Regulated New Source Review (NSR) Air Pollutants and NSR Regulatory Applicability
ADAGE Gadsden LLC Gadsden County, Florida
Proposed Nominal 55.5-MW Net Woody Biomass Power Plant

Estimated Potential to Emit (PTE) Criteria Air Pollutants (tons per year)										
Source Operation	Reference	PM	PM₁₀	PM_{2.5}	NO_x	SO₂	H₂SO₄	CO	VOC	Fluorides^(c)
Woody Biomass Fluidized Bed Boiler	Tables 2-2 & 2-3	96	96	96	232	149	26	246	56	5
Woody Biomass Handling and Processing	Table 2-7	7.71	3.65	0.55	--	--	--	--	--	--
Fly Ash Handling	Table 2-7	0.04	0.02	0.003	--	--	--	--	--	--
Boiler Support Material Handling	Table 2-7	0.03	0.01	0.002	--	--	--	--	--	--
Wood Chipper Combustion Emissions	Table 2-7B	0.20	0.20	0.20	6.91	0.003	2.24E-04	1.58	0.20	
Emergency Generator & Storage Tank	Table 2-8	0.04	0.04	0.04	1.3	0.002	0.0001	0.7	1.3	--
Emergency Fire Pump & Storage Tank	Table 2-9	0.02	0.02	0.02	0.4	0.12	0.01	0.3	0.4	--
Project Total PTE Excluding Fugitive Sources ^(a)		104	100	97	241	150	26	248	58	5
Major Source Threshold Rates ^(b) (tons per year)		250	250	250	250	250	250	250	250	250
Project Classified as Major Source Under PSD?		no	no	no	no	no	no	no	no	no
Fugitive Source Operation	Reference	PM	PM₁₀	PM_{2.5}	NO_x	SO₂	H₂SO₄	CO	VOC	Fluorides
In-plant Paved Roads	Table 2-4	22.3	4.3	0.7	--	--	--	--	--	--
Wood Chipper Emissions	Table 2-7A	1.0	0.10	0.10						
Woody Biomass Pile Processing	Table 2-5	1	0.08	0.01	--	--	--	--	--	--
Woody Biomass Pile Wind Erosion	Table 2-6	2.2	1.1	0.2	--	--	--	--	--	--
Total Fugitive Source PTE		27	6	1	0	0	0	0	0	0
Project Total PTE Including Fugitive Sources		131	106	98	241	150	26	248	58	5

Notes:

a) Fugitive emission sources are excluded from the estimated project total emissions for purpose of determining major source status per F.A.C. 62-210.200(195)(c).

b) Proposed woody biomass boiler will be capable of natural gas, propane and ULSD (classified as fossil fuels) combustion for startup, shutdown, and bed stabilization purposes and woody biomass (classified as a renewable energy fuel) for normal operations. The heat input of the natural gas and/or propane burners will be less than 250 mmBtu/hour. Because the boiler will not be capable of burning fossil fuels at a heat input rate of greater than 250 mmBtu/hour, the 100-ton/year major source threshold rate does not apply to this project.

c) Refer to Tables 2-10 and 2-12 for supporting emission estimates.

Professional Engineer Certification

1. Professional Engineer Name: David Cibik Registration Number: 55467
2. Professional Engineer Mailing Address... Organization/Firm: Malcolm Pirnie, Inc. Street Address: 1300 East 8th Avenue, Suite F100 City: Tampa State: Florida Zip Code: 33605
3. Professional Engineer Telephone Numbers... Telephone: (813) 248 - 6900 ext. Fax: (813) 248 - 8085
4. Professional Engineer E-mail Address: DCibik@pirnie.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(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</i> <i>(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.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> , 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.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/> , 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 <input type="checkbox"/> , 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.</i> <i>(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.</i> <div style="display: flex; justify-content: space-between;"><div>Signature (seal)</div><div>3/3/10 Date</div></div>

* Attach any exception to certification statement.

GADSDEN COUNTY TIMES
PUBLISHED WEEKLY
QUINCY, GADSDEN COUNTY, FLORIDA

RECEIVED

MAR 10 2010

BUREAU OF AIR REGULATION

State of Florida

County of Gadsden:

Before the undersigned personally appeared, Mary Williams, who on oath as Representative of the Gadsden County Times, a weekly newspaper at Quincy in Gadsden County, Florida; that the attached copy of the advertisement, being a legal in the matter of:

NOTICE OF APPLICATION

ADAGE GADSDEN LLC

DUKE ENERGY GENERATION SERVICES

was published in said newspaper in the issues:

2/18-10

Affiant further says that the said Gadsden County Times newspaper is published at Quincy, in Gadsden County, Florida, and that the said newspaper has heretofore been continuously published in Gadsden County, Florida, each week and has been entered as periodicals at the post office in Quincy, in Gadsden County, Florida for a period of one year preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm, or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Personally known X or Produce Identification _____

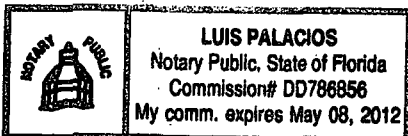
Mary Williams

Signature of Affiant

Sworn to and subscribed before me this 22

day of February, 2010

Luis Palacios



NOTICE OF APPLICATION
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 0390046-001-AC
ADAGE Gadsden LLC
Woody Biomass Electric Power Plant
Gadsden County

The Department of Environmental Protection (Department) announces receipt of an application for an air construction permit from ADAGE Gadsden LLC. The application is to construct a 55.5 megawatts (MWnet) woody biomass electric power plant on a 72-acre site near the intersection of State Highway 12 (Greensboro Highway) and US Highway 90 (Main Street), south of Gretna, Gadsden County, Florida.

The feed stocks for the facility are described in the application as primarily wood chips but including logging and lumber mill residues, untreated wood materials and other clean wood materials. Further details about the feedstock, power plant and control technologies are given in the application.

The initial application was received on January 28, 2010. The application is under review by the Department to determine whether it is complete. The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the following Department offices:

Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32399-2400
Telephone: 850/921-9529 or 414-7268
Fax: 850/921-9533

Department of Environmental Protection
Northwest District Branch Office
630-3 Capital Circle NE
Tallahassee, Florida 32301
Telephone: 850/488-3704
Fax 850/922-3620

The application can also be accessed at the Department's website at:

www.dep.state.fl.us/Air/emission/construction/adage_gadsden.htm

Information regarding the project is also available at the company's website at:

www.adagebiopower.com/florida/gadsden/