



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

RECEIVED

MAY 02 2011

BUREAU OF
AIR REGULATION

April 27, 2011

Mr. John Diesch
Authorized Representative
Northwest Florida Renewable Energy Center, LLC
1331 17th Street, Suite 720
Denver, Colorado 80202

Dear Mr. Diesch:

Northwest Renewable Energy Center, LLC has applied for a minor source permit from the Florida Department of Environmental Protection (FL DEP) for a biomass gasification unit located in Port St. Joe, Florida. While FL DEP has authority to issue the minor source permit to this facility, the U.S. Environmental Protection Agency would like to call your attention to recent activity with regards to Greenhouse Gas (GHG) regulations for biomass facilities. EPA has proposed a temporary deferral of certain GHG emissions from prevention of significant deterioration (PSD) and title V permitting applicability. The proposed Deferral and Interim Guidance was released on March 11, 2011. The exemption will be for carbon dioxide (CO₂) emissions (not all GHG emissions) from biomass combustion and other biogenic emission sources. In conjunction with the proposed rule, a further independent scientific analysis will be conducted during the 3-year deferral. EPA is expected to complete rulemaking to exempt certain sources of CO₂ emissions from permitting requirements by July 1, 2011.

If the deferral does not go in place by July 1, 2011, the facility will be required to submit a full PSD application to EPA for review and approval. This would be required based on the GHG emissions exceeding the 100,000 tpy CO₂-equivalent subject to regulation threshold for the facility. Should this be the case, the facility should submit a PSD application for the entire facility for all pollutants exceeding the significant emission rates. The requirement to obtain a PSD permit for this project does not invalidate any FL DEP issued permits for this facility.

Please contact Heather Ceron at (404) 562-9185 or abrams.heather@epa.gov should you have any questions.

Sincerely,

Gregg M. Worley
Chief
Air Permits Section

cc: Trina Vielhaur
Deputy Director, FL DEP