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December 14, 2010

093-87660

Via Electronic Delivery

Ms. Trina Vielhauer, Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

**RE: SOUTHEAST RENEWABLE FUELS, LLC
DRAFT AIR CONSTRUCTION PERMIT NO. 0510032-001-AC/PSD-FL-412
ASPRING ADVANCED BIOREFINERY
REQUEST FOR MINOR CORRECTIONS**

Dear Ms. Vielhauer:

Southeast Renewable Fuels, LLC (SRF) and Golder Associates Inc. have received the draft air construction permit issued on November 19, 2010, for the Aspring Sweet Sorghum-to-Ethanol Advanced Biorefinery, to be located in Hendry County, Florida. Upon review of the draft permit, we have noted a few minor corrections and/or typographical errors we believe should be corrected in the final air permit to be issued. The reason SRF is providing these comments is to inform the Florida Department of Environmental Protection (FDEP) of necessary corrections and/or typographical errors in the draft permit. Therefore, SRF would not have any objections to the FDEP making these suggested changes in the final permit. SRF waives any right to file a petition for administrative hearing on any such changes incorporated into the final air construction permit, per the conditions of the Settlement Agreement.

The requested corrections are described below, with the permit wording provided, followed by the requested correction.

Section 3. Emissions Unit Specific Conditions

B. Cogeneration Biomass Boiler (EU-002)

10. Emission Limits:

REQUESTED CORRECTION: Footnote "c" of table: sulfuric acid mist (SAM) emissions are now 6.1 tons per year (TPY), based on the revised sulfur dioxide (SO₂) emission limit of 0.06 pound per million British thermal units (lb/MMBtu); therefore, prevention of significant deterioration (PSD) review no longer applies to this pollutant.

15. Excess Emissions Allowed for CO:

CURRENT WORDING: As specified in this condition, excess emissions resulting from startup, shutdown and documented malfunctions are allowed provided that operators employ the best operational practices to minimize the amount and duration of emissions during such incidents. CO emission data exclusions resulting from startup, shutdown, or documented malfunctions shall not exceed two hours in any 24-hour period except for the specific cases listed below. A "documented malfunction" means a malfunction that is documented within one working day of detection by contacting the Compliance Authority by telephone, facsimile transmittal, or electronic mail.

REQUESTED CORRECTION: Per Rule 62-210.700, Florida Administrative Code (F.A.C.), only malfunctions that result in excess emissions need to be reported within 1 day to FDEP [see Specific Condition (S.C.) 12]. However, other malfunctions which do not result in excess emissions should

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also be excluded from the lb/MMBtu emission limit. The 12-month carbon monoxide (CO) limit in Condition 10 is not subject to the continuous emission monitoring system (CEMS) data exclusion. All malfunctions must be reported on a quarterly basis per S.C. 26. Therefore, the condition should be re-written as follows:

15. Excess Emissions Allowed for CO: As specified in this condition, excess emissions resulting from startup, shutdown and malfunctions are allowed provided that operators employ the best operational practices to minimize the amount and duration of emissions during such incidents. For determining compliance with the lb/MMBtu CO limit in Condition 10, CO emission data exclusions resulting from startup, shutdown, or malfunctions shall not exceed two hours in any 24-hour period except for the specific cases listed below. For determining compliance with the tons per year (TPY) CO limit in Condition 10, all CO emissions data, including emissions resulting from startup, shutdown, or malfunctions, shall be included.

b. Warm Startup:

CURRENT WORDING: For a warm startup of the boiler, CO emission data exclusions shall not exceed three (3) hours in any 24-hour period. A warm "startup of the steam turbine system" is defined as startup of the boiler following a shutdown lasting less than least 24 hours.

REQUESTED CORRECTION: In second sentence, delete "least" prior to "24 hours."

17. Boiler Performance Test:

REQUESTED CORRECTION: Reference to Specific Condition 16 should be "18."

20. Test Methods:

REQUESTED CORRECTION: Add Method 26 for hydrogen chloride (HCl) to the list of test methods.

26. Quarterly CO, NO_x, SO₂, HCl, HF and Opacity Emissions Report:

REQUESTED CORRECTION: CO should be included in second to last sentence to report exclusions from compliance determinations. The second to last sentence then would read as follows:

If opacity COMS data or **CO CEMS** data is excluded from a compliance determination during the quarter due to a startup, shutdown or malfunction, the permittee shall include a description of the malfunction, the actual emissions recorded, and the actions taken to correct the malfunction.

C. Cooling Towers (EU-003)

7. VOC Emissions:

REQUESTED CORRECTION: Subpart VVa is referenced for these requirements – this is not correct and should be removed.

D. Ethanol Production Process (EU-004)

5. Dehydration:

REQUESTED CORRECTION: Change "on permeate tank collector" to "one permeate tank collector."

K. Facility-Wide Fugitive VOC Emission Leaks

3. LDAR Program Plan Implementation:

CURRENT WORDING: As per **Condition 11** of Section II of this permit, the permittee must submit for approval a LDAR program plan no later than 90 days prior to commencing operation. Once the

program plan is approved by the Compliance Authority, the permittee shall implement the program within 180 days of initial startup of the SRF. [40 CFR 60, Subpart VVa ; Application No. 0510032-001-AC; Rule 62-210.200(PTE), F.A.C. and Rule 62-4.070(3), F.A.C. Reasonable Assurance]

REQUESTED CORRECTION: This condition should refer to the preliminary LDAR program contained in Appendix LDAR.

Section IV. Appendices

Appendix BMP:

CURRENT WORDING: *{Permitting Note: The preliminary BMP plan will be updated by SRF as the engineering of the Biomass Receiving, Handling, Storage and Processing emission unit (EU-001) is finalized. The final BMP plan must be submitted to the Compliance Authority no later than 180 days before the SRF facility becomes operational.}*

REQUESTED CORRECTION: The reference to 180 days should be revised to read "90 days," to be consistent with Condition 3.A.11.

Appendix CEMS

19. Data Exclusion Procedures for SIP Compliance:

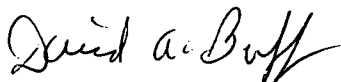
CURRENT WORDING: As per the procedures in this condition and **Specific Condition 13 of Subsection 3 B** of this permit, limited amounts of CEMS and COMS emissions data may be excluded from the corresponding compliance demonstration, provided that best operational practices to minimize emissions are adhered to and the duration of data excluded is minimized. The data exclusion procedures of this condition apply only to SIP-based emission limits.

REQUESTED CORRECTION: "Specific Condition 13" should read "Specific Conditions 15 and 16."

Thank you for considering these comments. If you have any questions, please do not hesitate to call me at (352) 336-5600.

Sincerely,

GOLDER ASSOCIATES INC.




David A. Buff, P.E., Q.E.P.
Principal Engineer

cc: Don Markley, SRF
Carlos Rionda, SRF
Jerry Paul, Capital Energy
Ronnie Moore, FDEP
Al Linero, FDEP
Angela Morrison, HG&S

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