Walker, Elizabeth (AIR)

From: Osbourn, Scott [Scott_Osbourn@golder.com]

Sent: Tuesday, July 08, 2008 12:23 PM

To: Read, David; Linero, Alvaro
Subject: BG&E Draft RAI Response Letter

Attachments: RAI Response Letter.doc; Attach 1.pdf; Attach 3.pdf; Attach 4.pdf

Attached are the draft RAI response letter and attachments. I'll send the remaining attachments (2, 5 and 6) tomorrow. Please let me know if Wednesday afternoon will work to discuss the draft package.

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Golder Associates Inc.

5100 West Lemon Street Suite 114 Tampa, FL USA 33609 Telephone: (813) 287-1717 Fax: (813) 287-1716



July 3, 2008

07389628

Florida Department of Environmental Protection 2600 Blairstone Road Tallahassee, Florida 32399-2400

Attention: Mr. A. A. Linero

RE: RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION BIOMASS GAS AND ELECTRIC; FACILITY ID NO. 0730109

Dear Mr. Linero:

This letter is in response to your request for additional information regarding the Air Construction Permit application submitted by Golder Associates Inc. on behalf of Biomass Gas and Electric (BG&E) on April 3, 2008.

1. Material Handling. In the application, it is indicated that the wood fuel feedstock will be processed off-site and shipped by train to the facility location. The exact composition of the wood feedstock is not provided. Will the feedstock contain understory materials such as detritus material from the floor of forest areas and leaves and small branches or will it consist solely of chipped to size wood chunks from tree trunks? Detritus materials and leaves may contain mercury from dry and wet deposition which could affect the mercury emission estimates. [Rule 62-4.070, F.A.C. Reasonable Assurance]

Response—The feedstock will consist of woody biomass, which will be processed at a remote fuel preparation area. At this remote area, the feedstock will be sorted, screened and chipped to size. Although some leaves and small branches may inadvertently find their way into the feedstock, the focus is on producing wood chips from the woody biomass. Fuel availability appears to be both predictable and plentiful going forward, with the only real concern involving transportation costs. BG&E is being somewhat opportunistic in our feedstock approach, meaning that we will contract for some supplies but will also take advantage of more economic market opportunities when possible. The advantage of the gasification technique is that most biomass will react the same.

Some of the available feedstock types that are categorized as woody biomass include the following:

- Sander dust;
- Saw dust;
- Georgia Pacific fuel;
- Hogged fuel;
- Knots and shives; and
- Processed butt cuts.

FDEP Mr. Al Linero

The Georgia Pacific (GP) fuel is in essence the reject material off of the round wood debarking system at the GP OSB Hosford, Florida Mill. The hogged fuel is material that comprises land clearing debris that has either been pre-processed, run through a Tub Grinder, or a Horizontal Mill at a specific private forest clearing site. Knots and shives are the unique residues from the specialty pulping operation at Florida Buckeye in Perry, Florida. Finally, the butt cuts are round wood residues that are either of oversized or undersized non-processible materials from post or pole manufacturers.

-2-

Attachment 1 to this letter provides constituent analyses for the different types of woody biomass summarized above, including analyses for mercury. The Department has an interest in mercury emissions and has provided references for potential mercury emissions from combustion of biomass due to forest fires. The range that is given is 14 to 71 nanograms per gram of biomass. While the references are instructive, a comparison to potential emissions from the proposed project isn't valid for several reasons. The mercury emissions from forest fires include forest understory and volatilization of mercury in soils. In addition, the BG&E project is not combustion, but gasification of the feedstock. Nevertheless, using these mercury factors from the literature, and the proposed feedstock processing rate, an uncontrolled mercury emission estimate of 103 grams per year (0.23 lb/yr) was obtained. Finally, as these uncontrolled levels are very low in the biomass feedstock to the gasifier, the mercury that might be present is effectively controlled in the project's proposed gas cleanup system. More detail on this system is provided in the response to Comment No. 6 in this/letter.

2. <u>Startups/Shutdowns</u>. In the application, it is estimated that there will be a total of 6 startups of the gasifier system per year. There is no request of provisions in the permit for additional startups for shakedowns during the initial operation of the facility. Does BG&E actually anticipate that the facility will not require additional startups and shutdowns of the gasifier system during the first year of the facility's operation? [Rule 62-4.070, F.A.C. Reasonable Assurance]

Response-- During initial operations, there will be a larger number of startups and shutdowns than the 6 anticipated after the startup and shakedown period. The 6 is based on annual operations after the shakedown period.

In addition, there is a major difference between a cold startup, which takes at least 18 hours, and a hot startup, which can take from as little as a few minutes to several hours. For definition purposes, hot startups are defined as ones where the gasifier is over 1,000 °F when the startup occurs.

At another gasification facility, the Burlington facility, there were approximately 22 cold startups/shutdowns during the first year of operation. By 2001, this number had dropped to 7. Cold startups involve a transition period during the change from air-fired operation to pyrolysis, where smoke can be produced during the change from excess oxygen combustion to sub-stoichiometric oxygen combustion, and finally to pyrolysis. This period of operation at the flare has an expected initial duration of up to 30 minutes for cold startups. One of the operational objectives of the Tallahassee plant is to reduce the length of the cold startup transition to a minimum, with a target of 10 minutes achieved after the first year of operation. Flare design to help minimize sub-stoichiometric conditions during burnoff are a part of the preliminary engineering design effort, with the objective of minimizing smoke production during the sub-stoichiometric transition.

Emissions from hot startups are minimal, since the wood still pyrolyzes at temperature, with low tar formation. During an electrical trip, gas production tapers off over about three minutes to a zero flow. The gas is flared during this period. Since the gas varies in composition rapidly during this three minute

period, there will be events of a few seconds duration where the flared gas may transition through a substoichiometric range and produce smoke.

Therefore, in response to the Department's comment, BG&E would like to clarify that as many as 22 startup/shutdowns (either hot or cold starts) could occur during the initial 12 months of operation. Subsequent to this initial decommissioning period, we expect that no more than 6 startup/shutdowns would be required annually.

3. Volatile Organic Compounds (VOC) and Sulfur Dioxide (SO₂) Emissions during Shutdowns. On pages 12 to 15 of the application, emission estimates are provided for nitrogen oxides (NOx) and particulate matter (PM) during shutdowns, while none are given for VOC and SOx based on the argument that these emissions from the turbines are already low. What are the anticipated emissions of these pollutants during shutdowns? [Rule 62-4.070, F.A.C. Reasonable, Assurance]

Response-- As previously stated, emissions during shutdown are anticipated to be low. Emission estimates were provided for NOx (0.05 tons per year or TPY) and PM (0.0005 TPY) based on material balance and AP-42 emission factors. Attachment 2 provides a tabular summary of all anticipated shutdown emissions, including estimates for VOC and SO_2 . These estimates are thought to be conservative and also rely on AP-42 emission factors.

4. <u>Startup and Shutdown Procedures</u>. In Section 2.2.1 of the application, the startup and shutdown modes and procedures for the gasifier/power block are briefly described with the caveat that full descriptions of the procedures are not provided due to their proprietary nature. To effectively assess the proposed durations and associated emissions involved during the startup and shutdown of the gasifier/power block of the facility, the Department requires a full description of the procedures. Please indicate which submitted documents are considered proprietary. [Rule 62-4.070, F.A.C. Reasonable Assurance]

Response-- The full description of the startup/shutdown procedure, which SilvaGas has currently developed, was included in the air application. SilvaGas has also developed a preliminary gasifier startup schedule (see Attachment 3, Figure 1), consistent with the cold startup duration described in the response to Comment No. 2 above. The figure presents a sequence of 16 discrete steps that comprise a typical cold startup (the worst case emissions impact). A more detailed procedure is undergoing development, to be provided to plant staff as the system Operating Manual. These procedures and associated manual are evolving as part of the detailed design phase of the engineering effort. It is not BG&E's intent to claim these procedures as proprietary. In fact, BG&E would be receptive to a permit condition that required appropriate staff training to minimize emissions during startup and shutdown events, per the procedures developed by BG&E.

5. <u>Refractory Life</u>. If the facility only requires 6 startups per year what is the anticipated life of the gasifier refractory? If additional startups are required, especially during the initial operation of the facility, how is the life of the refractory affected? [Rule 62-4.070, F.A.C. Reasonable Assurance]

Response— The refractory life varies substantially, depending on the location of the refractory in the vessel. SilvaGas obtained a patent on installing tees instead of elbows at 90 degree flow direction changes, in order to reduce the erosion rate at the ells (i.e., the critical point of circulation between the gasifier and the combustor). Improved materials suggest that the life of the refractory in straight sections of the vessels and ductwork will be approximately 5 years, although there are examples in similar services where the refractory has lasted in excess of 30 years. The worst case found at

Burlington was for a vent pipe off a seal pot which had a gas velocity of 400 feet per second. This refractory lasted only two weeks, but was an isolated case compounded by design error.

Our cyclone vendors suggest an upper limit on gas flow velocity to minimize refractory wear in the cyclone impact zones. Hard facing of exotic materials such as silicon or tungsten carbide plates are planned for the worst impact zones. SilvaGas currently is using advanced computational fluid dynamics software which can predict erosion locations and wear rates. One of the ongoing maintenance programs for the Tallahassee plant is to verify and calibrate the computer prediction of refractory erosion locations and wear rates.

Startups and shutdown affect refractory life only if the heatup and cooldown rates result in thermal expansion-based stresses. The maximum heatup and cooldown rates for the Tallahassee plant are based on Burlington rates which successfully prevented thermal stress induced cracks. An additional factor is the refractory anchoring spacing and design. BG&E is working closely with our original refractory vendor, based out of Tampa, to provide the correct anchor spacing and design.

6. Syngas Cleanup. In Section 2.1.3 of the application, the syngas cleanup system proposed for the project is discussed. However, very few details of the proposed system are given. In previous meetings between the Department and BG&E, it was indicated by BG&E that the syngas cleanup system will be provided by Dahlman Filter Technology. Based on research done by the Department, the technology provided by Dahlman principally involves the removal of tar compounds from the syngas stream utilizing an oil wash. Details on the removal of other pollutants of concern (particulates, inorganic impurities such as sulfur compounds and volatile metals) were not available from research or in the application. Please provide to the Department a more detailed description of the syngas cleanup system proposed for the facility, including, if available, process schematics, which will allow the Department to make a comprehensive technical evaluation of the gas cleanup system. If such information is deemed proprietary, please indicate on the submitted documents. [Rule 62-4.070, F.A.C. Reasonable Assurance]

Response—A Technical Information Paper on Dahlman's gas cleanup technology, modified to reflect the proposed Tallahassee Renewable Energy center project, has been included as Attachment 4 to this letter. The paper-provides a simplified process flow diagram of the product gas cleanup system. As described in the attachment, the gas cleanup system has no direct emissions to the atmosphere. Only condensate water leaves the closed system.

Further background on the gasifier is necessary in order to understand the operation of the gas cleanup system. The gasifier operates as a pyrolysis unit, under reducing conditions. For instance, organic sulfur and nitrogen in the feedstock are converted to H2S and NH3 in small amounts. In a similar fashion, it is expected that mercuric salts, methyl mercury organics or mercuric oxides would be reduced to elemental mercury, and be evaporated into the product gas. The wash oil scrubbers remove tars above the dew point of water, so the vapor pressure of the elemental mercury remains high, and at its very low concentration, is anticipated to remain in the vapor phase. The same is true of the H₂S and NH_{3}

When the de-tarred product gas goes through the water scrubber at the tail end of gas cleanup, the acid gases and inorganic salts (metallic ions) are cooled down and absorbed to about a 90 percent removal level by the water. The removal level in such a system of mercury is quite low, due to the insolubility of mercury in the water, but the elemental mercury will react with the H₂S present to form mercuric sulfide, and be removed as a particulate in the main recirculating water loop. There is an additional

separate section in the water scrubber that has an isolated recirculating loop of caustic soda solution. The primary objective of this section is to remove the remaining H_2S by reaction with the caustic, making sodium sulfide.

This recirculating loop of caustic soda solution with sulfides in it also provides an ideal solution for scrubbing mercuric compounds out of the vapor phase, with the dissociation constant for mercuric sulfide at 10^{35} . Thus, the remaining mercury should be removed here, since the S ion concentration will be much higher here than in the main recirculating water loop.

This is the approach used at the mercury cell caustic chlorine plants for removing any traces (i.e., ppt) of mercury from plant waste water and the food-grade product caustic soda. The water is treated with a ppm concentration or lower of S ions, and the precipitated mercuric sulfide filtered out. Residual concentrations of mercury in the food grade caustic soda are removed in the same manner, down to non-detectable limits.

The recirculating water at the water scrubber is blown down on a regular basis, where it is used in the cooling tower as part of the cooling tower makeup water. The design has not proceeded far enough yet to determine if this water needs filtration. Should detectable mercury concentrations be obtained in either this blowdown or the blowdown from the separate caustic circulating loop, then this could be filtered to remove the mercuric sulfide particulate.

Further, the combustor receives char and olivine from the gasifier at about 1,350 °F. At this temperature, and under the gasifier reducing conditions, mercury compounds would be separated out in the upstream cyclones as part of the product gas, described above. A negligible amount of mercury would enter the combustor, as there would be virtually no mercury present in the char. However, if any mercury were present, it would-likely remain in the ash bound as a non-volatile inorganic salt rather than be released as a vapor. The vast majority of any mercury in the feedstock should end up in the makeup water from the water scrubber going to the cooling tower, and in particular, the blowdown from the separate caustic loop in the water scrubber which contains S ions.

Finally, the Department has expressed an-interest in the potential for emissions of dioxins and furans from the proposed project. Polychlorinated dibenzo-p-dioxins (PCDDs) and polychlorinated dibenzofurans (PCDFs), commonly known as dioxins and furans, are toxic, persistent and bioaccumulative, and result predominantly from human activity. "Dioxins and furans" refer to a group of chemical compounds that share certain similar chemical structures and biological characteristics. Dioxin is formed by burning chlorine-based chemical compounds with hydrocarbons. Furan is typically derived by the thermal decomposition of pentose-containing materials, cellulosic solids especially pinewood.

Dioxins and furans are unwanted by-products of incineration, uncontrolled burning and certain industrial processes. Industrial sources of dioxin to the environment include incinerators, metal smelters, cement kilns, the manufacture of chlorinated organics, and coal burning power plants. Dioxin is also produced by non-industrial sources (now considered by the U.S. EPA to be the greatest source in the U.S.), like residential wood burning, backyard burning of household trash, oil heating, and emissions from diesel vehicles.

Just as combustion provides a means for dioxin formation, so too does it allow for its destruction, through careful controls. A high combustion temperature, adequate combustion time, and turbulence to distribute heat all contribute to maximize dioxin destruction. Dioxin formation following combustion is

prevented by quickly cooling combustion gases, and minimizing the presence of certain metals known to promote dioxin formation.

As discussed with the Department, BG&E does not anticipate any significant emissions of dioxins or furans from the proposed project. As the project will be utilizing woody biomass as the feedstock, there will be no source of chlorine-based chemical compounds. In addition, the proposed gasification project does not rely on incineration or uncontrolled burning, which is associated with the majority of dioxin and furan formation.

7. Volatile Metal Emissions. As indicated in No. 6 above, no details are provided on how volatile metals, such as mercury, are going to be removed from the syngas. In the application, it is stated that the mercury concentration in the wood fuel is minimal and consequently expected mercury emissions are negligible. However, if this is not the case, does the syngas cleanup system utilize an activated carbon bed or something similar to control volatile metal emissions such as mercury? [Rule 62-4.070, F.A.C. Reasonable Assurance]

Response—This comment is addressed above.

8. <u>Duct Burner Firing</u>. Based on the application, it appears that the duct burners will only fire syngas (product gas). Will natural gas ever be fired in the duct burners? [Rule 62-4.070, F.A.C. Reasonable Assurance]

Response—Only product gas will be fired in the duct burners.

9. Emissions Averaging. In Table 3-2 of the application, emissions in ppm at 15 percent oxygen (O₂) of NO_x, carbon monoxide (CO), volatile organic compounds (VOC), and ammonia (NH3) appear to be given for annual stack testing requirements. Please provide Continuous Emissions Monitoring System (CEMS) 24 hour block average and 12 month rolling average estimates of CO emissions and 24 hour block average and 30 day rolling average estimates of NO_x, emissions when firing the combustion turbine and the combustion turbine in combination with the duct burners for the temperatures and loads cited in the table. [Rule 62-4.070, F.A.C. Reasonable Assurance]

Responsé-- BG&E's requested emission limits, as well as associated averaging times and compliance methods, are provided in Attachment 5.

10. <u>SO₂ Emissions</u>. On page 19 of the application, it is stated that SO₂ emissions will be minimized through the utilization of natural gas during startups and the gas cleanup system on the product gas. Please provide estimates of the SO₂ concentration in the product gas before and after cleanup. In addition, provide estimates of SO₂ stack emissions when firing product gas for the same conditions described in No. 9 above. [Rule 62-4.070, F.A.C. Reasonable Assurance]

Response—As stated earlier, the gasifier operates as a pyrolysis unit, under reducing conditions, converting organic sulfur in the feedstock to small amounts of H_2S . The H_2S is then reduced in the gas cleanup system. SO_2 emissions would result from the residual level of H_2S in the product gas (after the gas cleanup system), which is fired in the combustion turbines and duct burners, or, in the event of a system malfunction, when the product gas is flared. Attachment 6 provides a summary table of the H_2S in the pre- and post-gas cleanup scenarios, as well as the amount of SO_2 that is estimated to be emitted by firing of the product gas in the CT/DB or by flaring.

11. Combustion Turbine and Duct Burner Emissions Estimates. When comparing the upper and lower portions of Table 3-2 of the application, the emissions of NO_x, CO, and VOC appear to be lower when firing the duct burners than when not, please clarify. In addition, pollutants and units given in the table are not defined nor is the basis for the different emission concentrations for the various pollutants. Please redo this table and resubmit to address these issues and generally provide a clear overview of the expected emissions for the project as a function of turbine load, ambient air temperature, and duct burner firing. [Rule 62-4.070, F.A.C. Reasonable Assurance]

*Response— A subsequent discussion between Golder and David Read of the Department has cleared up the confusion associated with the emission table. At times, emissions on a concentration basis (i.e., ppmvd) can be lower from combined firing of a combustion turbine and duct burner than from a combustion turbine alone. Further, as stated in the response to Comment No. 9 above, BG&E has provided a tabular summary of the requested emission limits, including averaging times and methods of compliance (see Attachment 5).

Please do not hesitate to call should you require additional information.

Sincerely,

GOLDER ASSOCIATES INC.

Scott Osbourn, P.E. Senior Consultant

Enclosures

SO/dcg

HAPROJECTS\2007proj\073-89628 BG&E Air and Noise Support\RAI Response\RAI Response.docx



BIOMASS GAS & ELECTRIC LLC 3500 PARKWAY LANE SUITE 440 NORCROSS GA 30092

ATTN: SUE LAFLEUR

Client Sample ID:

Sander Dust

Sample ID By

Biomass Gas & Electric LLC

Page 1 of 2

Date Sampled:

N/A

Sample Taken At Sample Taken By -----

.....

Date Received: Product Description:

Apr 5, 2007

WOOD

SGS Minerals Sample ID: 491-0716796-002

		As Received	Dry	MAF
Bromine	(ASTM D4208(MODIFIED))	-	100	
% Total Moisture	[ASTM D4442(METHOD A)]	4.89		
% Ash	[ASTM D1102]	0.75	0.79	
Gross Calorific Value (Btu/lb)	[ASTM D3286]	7985	8395	8462
% Volatile Matter	[ASTM D3175]	74.94	78.79	
% Fixed Carbon	[ASTM D3172(Calc)]	· 19.42	20.42	
% Sulfur-	[ASTM D4239(METHOD C)]	80.0	0,08	
% Carbon	[ASTM D5373]	47.66	50.10	
% Hydrogen	[ASTM D5373]	6.68	7.03	
% Nitrogen	[ASTM D5373]	4.33	4.56	
% Oxygen	[ASTM D5373(Calc)]	35.61	37.44	
Fluorine, ug/g	(ASTM D3761)		<10	
% Chlorine	[ASTM E776]	0.09	0.09	
Mercury, ug/g	[SW846-7471A]		0.09	

Analyte	Result	Method
Arsenic, As	<1 ug/g	ASTM D3683
Cobalt, Co	<1 ug/g	ASTM D5600
•	<1 ug/g	ASTM D5600
Molybdenum, Mo	<1 ug/g	ASTM D5600
Silver, Ag	<1 ug/g	ASTM D5600
Thallium, TI	<0.50 mg/Kg	ASTM D5600
Tungsten, W	<0.50 mg/Kg	ASTM D5600
Zirconium, Zr	1020 ug/g	ASTM D5600
Sodium, Na	• • • • • • • • • • • • • • • • • • • •	ASTM D5600
Potassium, K	662 ug/g	
Cerium, Ce	<0.50 mg/Kg	ASTM D5600
Lithfum, Li	<1 ug/g	ASTM D5600
Caldium, Ca	79 ug/g	ASTM D5600
Magnesium, Mg	252 u g /g	ASTM D5600
Barium , Ba	7 ug/g	ASTM D5600
Strontium, Sr	4 ug/g	ASTM D5600
Phosphorus, P	163 ug/g	ASTM D5600
Antimony, Sb	<1 ug/g	ASTM D5600
Chromium, Cr	<1 ug/g	ASTM D5600
•	<1 ug/g	ASTM D5600
Copper, Cu	<1 ug/g	ASTM D5600
Lead, Pb	<1 ug/g	ASTM D6600
Nickel, Ni	< r ugig	70 1141 20000

Minerals Services Division

16130 Van Orunen Road South Holland II. 60473 t (708) 331-2900 f (708) 333-3060 www.sgs com/minerals

Member of the SGS Group

SGS North America Inc.



BIOMASS GAS & ELECTRIC LLC

3500 PARKWAY LANE

SUITE 440

NORCROSS GA 30092

ATTN: SUE LAFLEUR

Client Sample ID:

Saw Dust

Sample ID By

Blomass Gas & Electric LLC

Page 1 of 2

Date Sampled:

N/A

Sample Taken At

Date Received:

Apr 5, 2007 WOOD Sample Taken By

Product Description: WO

SGS Minerals Sample ID: 491-0716796-001

		As Received	<u>Dry</u>	<u>MAF</u>
Bromine	[ASTM D4208(MODIFIED)]		<20	
% Total Moisture	[ASTM D4442(METHOD A)]	59.68		
% Ash	[ASTM D1102]	1,26	3.12	
Gross Calorific Value (Blu/lb)	[ASTM D3286]	3410	8458	8730
% Volatile Matter	[ASTM D3175]	31.51	78.15	
% Fixed Carbon	[ASTM D3172(Calc)]	7.55	18.73	
% Sulfur	(ASTM D4239(METHOD C))	0.01	0.02	
% Carbon	[ASTM D5373]	20.20	50.11	
% Hydrogen	[ASTM D5373]	2.43	6.01	
% Nitrogen	[ASTM D5373]	0,11	0.26	
% Oxygen	[ASTM D53/3(Calc)]	16.31	40.48	
Fluorine, ug/q	[ASTM D3761]		<10	
% Chlorine	[ASTM E776]	<0.01	0.02	
Mercury, ug/g	[SW846-7471A]		<0.02	

7, 200		
Analyte	Result	Method
Arsenic, As	<1 ug/g	ASTM D3683
Cobalt, Co	<1 ug/g	ASTM D5600
Molybdenum, Mo	<1 ug/g	ASTM D5600
Silver, Ag	<1 ug/g	ASTM D5600
Thallium, TI	1 ug/g	ASTM D5600
Tungsten, W	<0.50 mg/Kg	ASTM D5600
Zirconium, Zr	<0.50 mg/Kg	ASTM D5600
Sodium, Na	77 ug/g	ASTM D5600
Potassium, K	338 ug/g	ASTM D5600
Cerium, Ce	1,30 mg/Kg	ASTM D5600
Lithium, Li	<1 ug/g	ASTM D5600
Calcium, Ca	178 ug/g	ASTM D5600
Magnesium, Mg	179 ug/g	ASTM D5600
Barium , Ba	8 ug/g	ASTM D5600
Strontium, Sr	6 ug/g	ASTM D5600
Phosphorus, P	73 ug/g	ASTM D5600
Antimony, Sb	<1 ug/g	ASTM D5600
Chromium, Cr	<1 ug/g	ASTM D5600
Copper, Cu	3 ug/g	ASTM D5600
Lead, Pb	<1 ug/g	ASTM D5600
Nickel, Ni	<1 ug/g	ASTM D5600
* ** **** = * * **		

SGS North America Inc.

Minerals Services Division 16130 Van Drunen Road Scuth Holland II. 60473 t (708) 331-2900 f (708) 333-3060 www.sgs.com/minerals

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BIOMASS GAS & ELECTRIC LLC

3500 PARKWAY LANE

SUITE 440 NORCROSS GA 30092

ATTN: SUE LAFLEUR

Client Sample ID:

GP Fuel

Sample ID By

Biomass Gas & Electric LLC

Page 1 of 2

Andrews and the contract of th

Date Sampled:

· N/A

Sample Taken At Sample Taken By

Date Received: Product Description: Apr 5, 2007 WOOD

SGS Minerals Sample ID: 491-0716796-005

		As Received	פֿאַ	MAF
Bromine	[ASTM D4208(MODIFIED)]		<20	
% Total Moisture	[ASTM D4442(METHOD A)]	36.14		
% Ash	[ASTM D1102]	1.15	1.80	
Gross Calorific Value (Btu/lb)	[ASTM D3286]	5786	9061	9228
% Volatile Matter	[ASTM D3175]	47.99	75.15	
% Fixed Carbon	[ASTM D3172(Calc)]	14.72	23.05	
% Sulfur	[ASTM D4239(METHOD C)]	0.04	0.06	
% Carbon	[ASTM D5373]	35.37	55. 38	
% Hydrogen	[ASTM D5373]	4.16	6.51	
% Nitrogen	[ASTM D5373]	0.17	0.27	
% Oxygen	[ASTM D5373(Calc)]	22.97	35.98	
Fluorine, ug/g	[ASTM D3761]		<10	
% Chlorine	[ASTM E776]	0.01	0.02	
Mercury, ug/g	[SW846-7471A]		<0.02	
Analyte		Result	Method	

<u>Analyte</u>	<u>Resuit</u>	<u>Method</u>
Analyte Arsenic, As Cobalt, Co Molybdenum, Mo Silver, Ag Thallium, TI Tungsten, W Zirconium, Zr Sodium, Na Potassium, K Cerium, Ce Lithium, Li	Result 5 ug/g <1 ug/g <1 ug/g <1 ug/g <1 ug/g <1 ug/g <0.50 mg/Kg <0.50 mg/Kg 368 ug/g 733 ug/g <0.50 mg/Kg <1 ug/g	Method ASTM D3683 ASTM D5600
Calcium, Ca Magnesium, Mg Bárium , Ba Strontium, Sr Phosphorus, P Antimony, Sb Chromium, Cr Copper, Cu Lead, Pb Nickel, Ni	477 ug/g 7 ug/g 6 ug/g 251 ug/g <1 ug/g <1 ug/g 3 ug/g <1 ug/g <1 ug/g	ASTM D5600

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SGS North America Inc.



BIOMASS GAS & ELECTRIC LLC 3500 PARKWAY LANE SUITE 440

NORCROSS GA 30092

ATTN: SUE LAFLEUR

Client Sample ID:

Hogged Fuel

Sample ID By

Biomass Gas & Electric LLC

Page 1 of 2

Date Sampled:

N/A

Sample Taken At

Date Received:

Apr. 5, 2007

Sample Taken By

Product Description: WOOD

SGS Minerals Sample ID: 491-0716796-004

		As Received	<u>Dry</u>	MAF
Bromine	[ASTM D4208(MODIFIED)]		<20	
% Total Moisture	(ASTM D4442(METHOD A))	34,54		
% Ash	[ASTM D1102]	1.10	1.57	
Gross Calorific Value (Btu/ib)	[ASTM D3286]	5403	8254	8394
% Volatile Matter	[ASTM D3175]	51.96	79.37	
% Fixed Carbon	[ASTM D3172(Calc)]	12.40	18.96	
% Sulfur	(ASTM D4239(METHOD C))	0.02	0.03	
% Carbon	[ASTM D5373]	30.89	47.20	
% Hydrogen	[ASTM D5373]	3.64	5.56	
% Nitrogen	[ASTM D5373]	0.22	0.34	
% Oxygen	(ASTM D5373(Calc))	29.59	45.20	
Fluorine, ug/g	[ASTM D3761]		<10	
% Chlorine	[ASTM E776]	0.02	0.02	
rousy, ag/g	[SW846-7471A]		0.03	

<u>aralyte</u>	Result	Method
Arsenic, As	4 ug/g	ASTM D3683
Cobalt, Co	<1 ug/g	ASTM D5600
Molybdenum, Mo	<1 ug/g	ASTM 05600
Silver, Ag	<1 ug/g	ASTM D5600
Thallium, TI	3 ug/g	ASTM D5600
Tungsten, W	<0.50 mg/Kg	ASTM D5600
Zirconium, Zr	0.69 mg/Kg	ASTM D5600
Sodium, Na	89 ug/g	ASTM D5600
Potassium, K	1146 ug/g	ASTM D5600
Cerium, Ce	<0.50 mg/Kg	ASTM D5600
Lithium, Li	<1 ug/g	ASTM D5600
Calcium, Ca	212 ug/g	ASTM D5600
Magneslum, Mg	411 ug/g	ASTM D5600
Barium , Ba	8 ug/g	ASTM D5600
Strontium, Sr	5 սց/ց	ASTM D5600
Phosphorus, P	466 ug/g	ASTM D5600
Antimony, Sb	<1 ug/g	ASTM D5600
Chromium, Cr	<1 ug/g	ASTM D5600
Copper, Cu	3 ug/g	ASTM D5600
Lead, Pb	2 ug/g	ASTM D5600
Nickel, Ni	<1 ug/g	ASTM D5600

Minerals Services Division

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SGS North America Inc



BIOMASS GAS & ELECTRIC LLC 3500 PARKWAY LANE **SUITE 440** NORCROSS GA 30092

ATTN: SUE LAFLEUR

Page 1 of 2

Client Sample ID:

Knots & Shives

Sample ID By

Biomass Gas & Electric LLC

Date Sampled:

N/A

Sample Taken At Sample Taken By

As Received

.

Drγ

Date Received: Product Description: Apr 5, 2007 WOOD

SGS Minerals Sample ID: 491-0716796-007

8364

MAE

Bromine	[ASTM D4208(MODIFIED)]		29
% Total Moisture	[ASTM D4442(METHOD A)]	61 _, 59	
% Ash	[ASTM D1102]	3.26	8.48
Gross Calorific Value (Blu/lb)	[ASTM D3286]	2940	7655
% Volatile Matter	[ASTM D3175]	28.31	73.71
% Fixed Carbon	(ASTM D3172(Calc))	6.84	17.81
% Sulfur	(ASTM D4239(METHOD C))	0.14	0.36
% Carbon	[ASTM D5373]	17.76	46.25
% Hydrogen	[ASTM D5373]	2.20	5.74
% Nitrogen	[ASTM 05373]	0.04	0.11
*	[ASTM D5373(Calc)]	15.01	39.06
% Oxygen	(ASTM D3761)		<10
Fluorine, ug/g	[ASTM E776]	0.03	0.09
% Chlorine Mercury, ug/g	[SW846-7471A]		<0.02

Analyte	<u>Result</u>	Method

Arsenic, As	<1 ug/g	ASTM D3683
Cobalt, Co	<1 ug/g	ASTM D5600
Molybdenum, Mo	<1 ug/g	ASTM D5600
· · · · · · · · · · · · · · · · · · ·	<1 ug/g	ASTM D5600
Silver, Ag	2 ug/g	ASTM D5600
Thallium, Ti	<0.50 mg/Kg	ASTM D5600
Tungsten, W	<0.50 mg/Kg	ASTM D5600
Zirconium, Zr	640 ug/g	ASTM D5600
Sodium, Na	52 ug/g	ASTM D5600
Potassium, K		ASTM D5600
Cerium, Ce	<0.50 mg/Kg	
Lithlum, Li	<1 ug/g	ASTM D5600
Calcium, Ca	107 ug/g	ASTM D5600
Magnesium, Mg	318 ug/g	ASTM D5600
Barium , Ba	<1 ug/g	ASTM D5600
Strontium, Sr	2 ug/g	ASTM D5600
	10 ug/g	ASTM D5600
Phosphorus, P	<1 ug/g	ASTM D5600
Antimony, Sb	<1 ug/g	ASTM D5600
Chromium, Cr	<1 ug/g	ASTM D5600
Copper, Cu	1 ug/g	ASTM D5600
Lead, Pb	* *	ASTM D5600
Nickel, Ni	<1 ug/g	AG LINI DOOO

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BIOMASS GAS & ELECTRIC LLC 3500 PARKWAY LANE SUITE 440 NORCROSS GA 30092

ATTN: SUE LAFLEUR

Client Sample ID:

Processed Butt Cuts

Sample ID By

Biomass Gas & Electric LLC

Page 1 of 2

Date Sampled: Date Received: N/A Apr 5, 2007 Sample Taken At Sample Taken By

Product Description:

DOOM

SGS Minerals Sample ID: 491-0716796-006

		As Received	₽nx	MAF
Bromine	[ASTM D4208(MODIFIED)]		<20	
% Total Moisture	[ASTM D4442(METHOD A)]	31.52		
% Ash	[ASTM D1102]	0.33	0.48	
Gross Calorific Value (Btu/ib)	[ASTM D3286]	5708	8336	8376
% Volatile Malter	[ASTM D3175]	57.01	83.25	
% Fixed Carbon	[ASTM D3172(Calc)]	11.14	16 27	
% Sulfur	JASTM D4239(METHOD C)]	0.01	0.01	
% Carbon	[ASTM D5373]	35.37	51.65	
% Hydrogen	[ASTM D5373]	4.18	6.10	
% Nifrogen	[ASTM D5373]	0.13	0.19	
% Oxygen	(ASTM 05373(Calc))	28.46	41.57	
Fluorine, ug/g	[ASTM D3761]		<10	
% Chlorine	(ASTM E776)	0.02	0.03	
Mercury, ug/g	[SW846-7471A]		<0.02	

Mercury, ug/g	[SW846-7471A]		CO.02	
Analyte		Result	<u>Method</u>	
Arsenic, As Cobalt, Co Molybdenum, Mo Silver, Ag Thallium, TI Tungsten, W Zirconium, Zr Sodium, Na Potassium, K Cerium, Ce Lithium, Li Calcium, Ca Magnesium, Mg Barlum, Ba Strontium, Sr Phosphorus, P Antimony, Sb Chromium, Cr Copper, Cu Lead, Pb		<1 ug/g <1 ug/g <1 ug/g <1 ug/g <1 ug/g <1 ug/g <0.50 mg/Kg 26 ug/g 126 ug/g <0.50 mg/Kg <0.50 mg/Kg 26 ug/g 126 ug/g <1 ug/g 41 ug/g 21 ug/g 22 ug/g 22 ug/g <1 ug/g	ASTM D3683 ASTM D5600	
Nickel, Ni		<1 ug/g	ASTM D5600	

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Technical Information Paper

OLGA Technology

OLGA Tar Removal

- Biomass gasification to electricity and more.. -

Revision spring 2008

Ministry of Economic Affairs

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Note: The information below reflects proposed operation of the Tallahassee Renewable Energy Center project.

1 Gas Purification Overview

Purification of product gas is an important aspect of operation for the Tallahassee Renewable Energy Center project. The gas purification steps that are necessary and how efficient they should be are dependent upon:

- 1 Feedstock (e.g. biomass) and its chemical components
- 2 Gasification technology & operational conditions of the gasifier
- 3 The application and downstream equipment; how clean should the gas be?

In general, we can identify the following gas treatment steps, summarized in their most logical order

- Particulate removal
 - -Cyclones, filters, electrostatic filters
- Removal of organic impurities
 - -Tar removal is the most important: OLGA
- Removal of inorganic impurities
 - Removal of nitrogen, halogens (mainly NH₃ and HCl) and low quantities of sulfur (H₂S), by scrubber (water) technology
- Sulfur removal (H2S) by a caustic polishing step.
- Removal of volatile (alkali / heavy) metals (e.g. mercury)
 - Mercuric sulfide removed as particulate in the water scrubber; vapor phase mercuric compounds removed in a caustic polishing step.

In general, we can say that the particulates and tars are produced by the gasifier. Gasifier type and operation determine the concentration and composition. OLGA combines the particulate and tar removal and is thus always a close match with the gasifier.

2 Tar Removal From Biomass Product Gas

The presence of tars in the biomass product gas is seen as the biggest issue in its smooth commercial application as a source of sustainable energy. Tar is formed in the gasifier and comprises a wide spectrum of organic compounds, generally consisting of several aromatic rings. The tar concentration



and composition is mostly determined by gasifier type and operation. Simplified tars can be distinguished as "heavy tars" and "light tars":

Heavy tars

Heavy tars condense out as the gas temperature drops and cause major fouling, efficiency loss and unscheduled plant stops. The tar dew point is a critical factor.

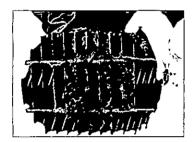




Figure 2.1, 2.2 & 2.3. Heavy tar fouls equipment, left to right: a water scrubber grid, soot formation on catalyst & a gas engine intercooler

Light tars

Light tars, like phenol or naphthalene, have limited influence on the tar dew point, but are not less of an issue. Light heterocyclic tars, like phenol, are very water soluble. These tars will be easily absorbed into water and chemically affect the bleed water of downstream condensers and aqueous scrubbers. Purification of this water is very cost- intensive and will jeopardize the plant's economic feasibility. Naphthalene is important, as it is known to crystallize at the inlet of gas engines causing a high service demand.





Figure 2.4 & 2.5: light tar fouls equipment & seriously contaminates condense water, Left- a gas engine control valve fouled with naphthalene crystals Right- contaminated condense water samples



Tar defined

A well accepted definition states that tars are all organic compounds with a molecular weight bigger than benzene. BTX (benzene, toluene and xylene) are components which are not considered to be as important, as they are not likely to influence the tar dew point nor to affect waste water treatment. A better and more detailed tar description is given by the classification of tars (see Appendix A).

The tar dew point, a critical parameter

The lowest temperature in the process is determined by downstream equipment and the application of the product gas. As typical tar dew points are between 150°C and 350 °C, and the lowest process temperature is typically 30-40 °C, tar condensation and tar issues are inevitable. It is important to realize that the actual tar concentration is not the most important parameter. It is the tar dew point which defines the point at which tars start to be a concern. One of the most important goals for the OLGA technology is to lower the tar dew point to a level at which such concerns can be excluded.

3 OLGA's Gas Cleaning Process

To introduce you to the OLGA technology, it is important to first show its position in a generic line-up of an integrated air blown gasification system with a gas engine for combined heat & power (CHP) production:

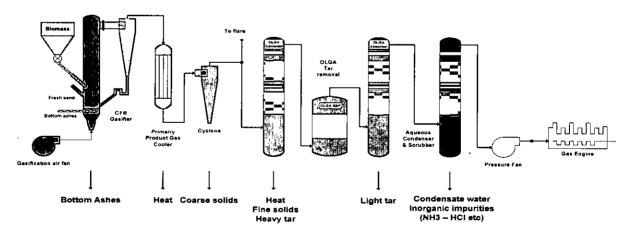


Figure 2.6 Generic line up



Product gas cleaning can be split into the following logical steps:

- 1. Solids/dust removal
- 2. Removal of organic impurities (tar)
- 3. Removal of inorganic impurities (e.g., NH3, HCl, H2S)

Product gas produced by the gasifier contains solids (dust), tars and inorganic impurities (depending on biomass feedstock). It is very important to consider the logical order for cleaning the product gas. In principle, mixing dust, tar and water is to be avoided.

Dust removal with OLGA

Solid particles (dust) can be separated from the product gas upstream OLGA by a cyclone or a hot gas filter (HGF). It is best to separate the dust first, as dust can be removed at a temperature in which water and tars are not present (>400 C). For the Tallahassee Renewable Energy Center project, it was decided to remove the coarse particles with a cyclone. The fine particles which pass this cyclone are captured by the Collector column and the ESP. A very high efficiency on particle capture can be ensured.

Removal of Organic Impurities

The philosophy of OLGA is based on dew point control. Tars have to be removed above the water dew point to a level at which the tar situation cannot occur in downstream equipment (minimal process temperature > tar dew point). In the figure below, the tar and water dew points are shown, together with the logical process steps.

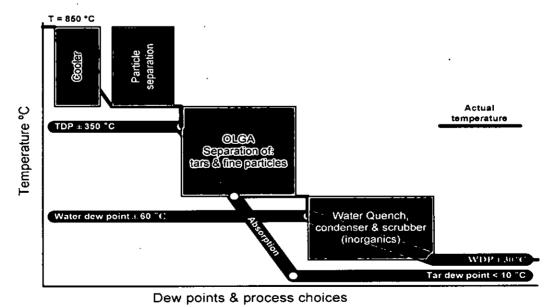


Figure 2.7 Dew points are important for equipment selection

Logical equipment with typical temperatures:



- 1. Product gas cooler; gasifier exit 700-900 °C- OLGA inlet 380 °C
- 2. Separation of solids; 380 °C
 - coarse solids by a cyclone (OLGA for fine solid aerosols)
 - all solids by a hot gas filter
- 3. OLGA tar separation; inlet 380 °C outlet 70-90 °C (safe above water dew point)
- 4. Water condenser; 70-90 °C to 30 °C
- 5. Water scrubber; 30 °C

OLGA operates above the water dew point, but decreases the tar dew point to a level under the lowest process temperature. Tar and water are not mixed. The tar removal principle of OLGA is based on a multiple stage scrubber in which the gas is cleaned by special scrubbing oil. In the first section of OLGA (the Collector) the gas is gently cooled down by the scrubbing oil. Heavy tar condenses, is collected, and is separated from the scrubbing oil. The heavy tar condensate, together with the fine solids, is recycled to the gasifier as a liquid. In the second stage (the Absorber / Stripper) lighter gaseous tars are absorbed by the scrubbing oil resulting in a product gas practically free from tars and solids.

In the absorber column, the scrubbing oil is saturated by these lighter tars. This saturated oil is regenerated in a stripper. Hot air is used to strip the tars of the scrubbing oil. This air, loaded with light tars, is recycled to the gasifier for combusting and as a fluidization medium. Hence, the stripper column design is not only based upon tar removal, but also upon the amount of air that can be used by the gasifier.

All heavy and light tars can be recycled to the gasifier where they are destructed and contribute to the overall energy efficiency. Tar waste streams are efficiently recycled this way.

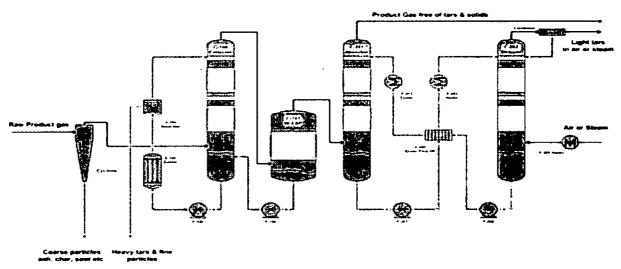


Figure 2.8 Simplified Process Flow Diagram of OLGA



Aqueous Scrubbers, Condensers and Caustic Polishing Downstream of OLGA

When gas is free of tar, an aqueous scrubber column can be operated more efficiently. This aqueous scrubber is normally used for:

- 1. Cooling the gas by quenching;
- 2. Further cooling of the gas and removal of the bulk of the water vapor by condensation;
- 3. Removal of water soluble components like NH₃, HCl, H₂S, if applicable.

The inorganic scrubber system is built as one column which is split into two sections. In section one, the gas will enter the column at the bottom and is scrubbed with cooling water. A large part of the water in the gas will condense and NH3 and HCl will dissolve in the water and be removed from the gas. Also, part of the H2S will dissolve in the water, but not enough to meet the gas turbine specification. Therefore, the inorganic scrubber system is executed with a second section. In this section, the remaining H2S is removed by a caustic polishing step. Diluted sodium hydroxide is the preferred caustic for this use. There is an additional separate section in the water scrubber that has an isolated recirculating loop of caustic soda solution. The primary objective of this section is to remove the remaining H2S by reaction with the caustic, making sodium sulfide.

The following paragraphs provide more detail on the chemistry of mercury within the process and its removal from the system. When the de-tarred product gas goes through the water scrubber at the tail end of gas cleanup, the acid gases and inorganic salts (metallic ions) are cooled down and absorbed to about a 90 percent removal level by the water. The removal level in such a system of mercury is probably low, due to the insolubility of mercury in the water, but the elemental mercury reacts with the H2S present to make mercuric sulfide, and drops out as a particulate in the main recirculating water loop. The recirculating loop of caustic soda solution with sulfides in it provides an ideal solution for scrubbing mercuric compounds out of the vapor phase, with the dissociation constant for mercuric sulfide at 10-35. Thus, all of the remaining mercury will likely be removed here, since the S- ion concentration should be much higher here rather than in the main recirculating water loop.

This is the approach used at mercury cell caustic chlorine plants for removing any traces (i.e., ppt) of mercury from plant waste water and the food-grade product caustic soda. The water is treated with a ppm concentration or lower of S- ions, and the precipitated mercuric sulphide is filtered out. Residual concentrations of mercury in the food grade caustic soda are removed in the same manner, down to non-detectable limits.

Summarized Advantages of OLGA

The principal advantage of OLGA is that it offers a reliable and sensible solution for the tar problem. The advantages can be summarised as follows:



- Minimal tar related problems
 - Increased system stability and availability
 - Minimization of waste water treatment costs
 - No tar waste streams
- Better gas quality compared to a thermal tar cracker
- More reliable and less vulnerable than a catalytic tar cracker
- No waste water impacts as with tar removal in an aqueous scrubber





Technical Information Paper

OLGA Technology

Appendix A: Tar Classification system

According to the ECN definition, tar comprises all organic components having a molecular weight higher than benzene. Benzene is not considered to be a tar. ECN uses a tar classification system comprising six classes (see Table B.1). This classification system is in particular developed to provide 'easy' insight in the general composition of tar. Trends are easier recognised on the basis of these classes. However, for more specific problems or issues the detailed data will remain necessary.

Class	Туре	Examples
1	GC undetectable tars.	Biomass fragments, heaviest tars (pitch)
2	Heterocyclic compounds. These are components that generally exhibit high water solubility.	Phenol, cresol, quinoline, pyridine
3	Aromatic components. Light hydrocarbons, which are important from the point view of tar reaction pathways, but not in particular towards condensation and solubility.	Toluene, xylenes, ethylbenzene (excluding benzene)
4	Light poly aromatic hydrocarbons (2-3 rings PAHs). These components condense at relatively high concentrations and intermediate temperatures.	Naphthalene, indene, biphenyl, antracene
5	Heavy poly aromatic hydrocarbons (≥4-rings PAHs). These components condense at relatively high temperature at low concentrations.	Fluoranthene, pyrene, crysene
6	GC detectable, not identified compounds.	Unknowns

Table B.1: Tar classification system

From the practical viewpoint, the classification comprises only tar components that can be measured. Classes 2 to 6 are sampled using the solid phase adsorption (SPA) method and measured by gas chromatography (GC). Although class 6 tars are sampled and measured (a peak is found in the chromatogram), it is unknown what the individual components are. In principle components in this class belong to the other classes, but are here lumped to a single concentration representing the 'unknowns'. Class 1 represents the heavy tar fraction (roughly ≥ 7 -ring PAHs). These components cannot be determined by the combination of SPA and GC. The components are measured by weight and thus represent the gravimetric tars.





Technical Information Paper

OLGA Technology

Appendix B: OLGA vs. other tar removal systems

Tars from biomass product gases can be removed with a thermal tar cracker, a catalytic tar cracker or a physical process. The thermal and catalytic tar cracker are installed directly downstream the gasifier and operate at high temperature. The physical processes like an aqueous scrubber or OLGA are installed downstream a product gas cooler. The inlet temperature of a tar cracker is typically 850°C and of a physical process 400°C.

Thermal tar cracking

A thermal tar cracker heats up the product gas to a temperature of 1200° C. At this temperature the tars are removed almost completely leading to a very low tar concentration (< 100 mg/m_n 3) and tar dew point (< 10° C). The disadvantage of this application of a thermal cracker is the reduction in efficiency. To increase the temperature of the product gas a part of the product gas is combusted with oxygen. Consequently, the system efficiency (biomass to electricity) is reduced as well as the calorific value of the product gas. The reduction in calorific value makes the application of the product gas from a direct air blown gasifier in a gas engine difficult.

Catalytic tar cracking

A catalytic tar cracker does not heat up the product gas and thus eliminates the disadvantages of a thermal cracker. In theory the tar removal efficiency can be complete. However, soot formation and deactivation of the catalyst is a serious problem to be dealt with, resulting in limitations in the process. At the moment, the tar concentration at the inlet of the cracker should remain below 2 g/m_{n^3} and the presence of alkali metals and sulphur should be controlled. Several projects have shown that a catalytic tar cracker can be a vulnerable part of the system. Bad tar removal by e.g. catalyst deactivation directly leads to heavy tar problems downstream. In principle the tar removal efficiency is less compared with a thermal cracker but good enough for the application of the product gas in a gas engine.

Tar removal by aqueous scrubbers

Aqueous tar removal systems cool down the product gas and remove the tars by condensation. In most aqueous systems dust and tars are collected simultaneously. The product gas is cooled down and aerosols of dust and tars are collected with a wet ESP downstream. Some systems use a dry hot gas filter (HGF) upstream for dust removal instead of a wet ESP. The HGF reduces the risk of fouling of the aqueous system with dust. The tar dew point downstream an aqueous system is similar to or higher than the operating temperature of the system. Therefore, the total tar content downstream an aqueous system can exceed 1 g/m $_n$ ³. To avoid tar condensation and fouling of piping the gas should not cool down. In the aqueous scrubber system a tar/water problem is created. Mixing (heavy) tars with water will lead to operational difficulties in the scrubber and huge maintenance costs. The most important disadvantage is formed by waste water handling. Waste water handling is often so expensive that the plants economical feasibility is at stake.

Preliminary Gasifier Start-Up Schedule																				
ID 0	Task Name Temperature, e	leg F	; Du	ration [-1 0 hrs	.↓1 ♠ AMB	[2 100				500 - 17-600		500	900	[11 1000	i 12. 1100	13 1200	1300	[15 1400	†16 1500	17
	Start Combustion Blo	wer		1 hr																
3	Start Gasifier Blower			1 hr		_														
-4	Start Combustion Du	t Bumer		12 hrs																
5	Start gasifier duct but	ner		12 hrs																
6	Start combustor seal	pet fluidizing flow		7 hrs						-										כ
7	Start gasifier seal pot	fluidizing flow		7 hrs																ם ו
8-	Increase combustor h	eatup rate		2 hrs										•						}
-9-	Increase gasifier heal	up rate		2 hrs											<u> </u>					
10	Start combustor over	oed burner		1 hr														-		
-11	Start wood and steam	n flowrate		1 hr					·											
12	Start combustor over	oed burner		1 hr																;
13	Ramp up wood to full	rates		1 hr]	
14	Reduce / stop gasifie	blower		1 hr														·]	
15	Stabilize at full rates			1 hr																ם כ
15	Reduce / stop combu	stor overbed burner		1 hr																כ
17				0 hrs																•
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Page 1																				