

Ali Leaphart

From: Ali Leaphart
Sent: Thursday, February 18, 2016 7:52 AM
To: Jordan, Monique
Subject: RE: RTC - Gainesville Renewable Energy Center - Facility ID 0010131 - Alachua County

Good Morning Monique,

I have received your email and appreciate your consideration.

Regards,

Ali Leaphart | Plant Engineer

NAES Corporation
Gainesville Renewable Energy Center
11201 NW 13th Street - Gainesville, FL 32653
Office 386.315.8019
Cell 352.529.7522
Email ali.leaphart@grecbiomass.com
www.naes.com



From: Jordan, Monique [mailto:Monique.Jordan@dep.state.fl.us]
Sent: Thursday, February 18, 2016 7:47 AM
To: Ali Leaphart
Cc: Russell Abel; Lovallo, Marc; Clark, Vincent; Kirts, Christopher; Maher, Jim
Subject: RTC - Gainesville Renewable Energy Center - Facility ID 0010131 - Alachua County

Please see the attached **Compliance Letter** for the subject facility.

Please note the following:

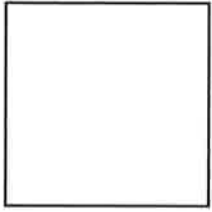
- The attached file can be opened by Adobe Reader, that can be downloaded from <http://get.adobe.com/reader/>
- PLEASE ACKNOWLEDGE THE RECEIPT OF THIS EMAIL, so we can be sure that you received it.

If you have additional questions, please contact Marc Lovallo at Marc.Lovallo@dep.state.fl.us.

Thank you.

Monique Jordan
Florida Department of Environmental Protection
Northeast District
8800 Baymeadows Way West, Suite 100

Jacksonville, Florida 32256



Ali Leaphart

From: Ali Leaphart
Sent: Monday, November 02, 2015 2:27 PM
To: Lovallo, Marc
Cc: Russell Abel; lenfagan@emienergy.com; cwasdin@emienergy.com
Subject: RE: CAO - GREC - Facility ID No.: 0010131 - Alachua County

Marc,

In response to the Compliance Assistance Offer I received on October 28th, please find our previously committed corrective actions as per the September 30th email correspondence, including recent updates and findings:

1. The clogged stack drain has been cleared of rust debris.
2. Similar rust debris and ash discovered in the ID fan inlet has been removed.
3. Weekly fan start sequence has proven all opacity values are in compliance and will continue.
4. Re-inspection of the baghouse to the stack on October 9th was clear, and inspections shall continue as needed to ensure compliance.
5. In addition to the COMS, Method 9 certified personnel witness the startups and validate the opacity values.

Sincerely,

Ali Leaphart | Plant Engineer

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Email ali.leaphart@grecbiomass.com

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From: Lovallo, Marc [mailto:Marc.Lovallo@dep.state.fl.us]
Sent: Wednesday, October 28, 2015 4:41 PM
To: Ali Leaphart
Subject: FW: CAO - GREC - Facility ID No.: 0010131 - Alachua County

Hi Ali,

Here is the compliance assistance letter. It was not sent to you like it was supposed to be. Our mistake.

Marc

From: Jordan, Monique
Sent: Tuesday, October 13, 2015 4:03 PM
To: russell.abel@grecbiomass.com

Cc: russell.abel@grecbiomass.com; Lovallo, Marc; Kirts, Christopher; Clark, Vincent; Maher, Jim; Webber, Heather; Fitzsimmons, Michael

Subject: CAO - GREC - Facility ID No.: 0010131 - Alachua County

Please see the attached **Compliance Assistance Offer Letter** for the subject facility.

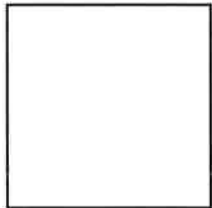
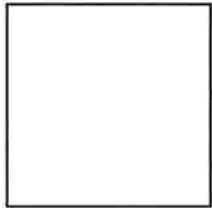
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If you have additional questions, please contact Marc Lovallo at Marc.Lovallo@dep.state.fl.us.

Thank you.

Monique Jordan
Florida Department of Environmental Protection
Northeast District
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256





Florida Department of Environmental Protection

Northeast District
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

October 13, 2015

Sent electronically to: ali.leaphart@grecbiomass.com

Ms. Ali Leaphart, Plant Engineer
Gainesville Renewable Energy Center
11201 Northwest 13th Street
Gainesville, Florida 32653

**RE: Compliance Assistance Offer
Gainesville Renewable Energy Center
Facility ID No.: 0010131
Alachua County – Air Program**

Dear Ms. Leaphart:

Department personnel have noted an emission exceedance for the Gainesville Renewable Energy Center. The purpose of this letter is to offer compliance assistance as a means of resolving the current matter and to maintain compliance in the future.

Specifically, a review of an e-mail notification sent to the Department on August 31, 2015, indicated the air emission limit for opacity was exceeded during a boiler startup. There were two 6-minute averages of 37.8% opacity reported. This is an apparent violation of Title V No. 0010131-004-AV, permit condition B.10. The emission limit for opacity during startup, shutdown and malfunctions is 20%, with one 6-minute block average of 27% being allowed.


PLEASE BE ADVISED this compliance assistance offer is part of an agency investigation preliminary to agency action within the meaning of Section 120.57(5), Fla. Stat. We request you review the above noted item of concern and respond in writing within **15 days** of receipt of this offer. Your written response should either:

1. Provide information that either mitigates the concerns or demonstrates them to be invalid.
2. Describe what you have done to resolve the issue.
 - a. Provide Best Management Practices describing the steps that will be taken to prevent future opacity violations.
3. Arrange for one of our specialists to meet at our office or visit your facility to offer suggested actions to return to compliance.

It is the Department's desire that you will be able to document compliance or corrective actions concerning the possible violations identified above so that this matter can be closed without enforcement. Your failure to respond promptly in writing (or by e-mail) may result in the initiation of formal enforcement proceedings.

Please address your response and any questions to Marc Lovallo of the Northeast District Office at (904) 256-1566, or via e-mail at marc.lovallo@dep.state.fl.us. We look forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely,


James R. Maher, PE
Assistant Director

c: Russ Abel - russell.abel@grecbiomass.com

Ali Leaphart

From: Ali Leaphart
Sent: Wednesday, September 30, 2015 8:49 AM
To: Kirts, Christopher
Cc: Lovallo, Marc; Read, David; Fitzsimmons, Michael; Maher, Jim; Russell Abel; cwasdin@emienergy.com; lenfagan@emienergy.com
Subject: RE: GREC Opacity
Attachments: DUCT INSPECTION 9282015.pdf

Good Morning Chris,

Since the facility certified the CEMS on November 18th, 2013, we have not experienced any opacity exceedances until August 28th, 2015. To present, we have had 18 cold and 14 warm startups of the boiler. As we discussed, the events of August 28th in the absence of a visual confirmation originally led us to believe that with five baghouse compartments isolated and increased velocity through the remaining 15 compartments, minimal ash accumulations could have been disturbed. We shutdown the process and inspected all compartments, bags, leak detectors and outlet plenums. Finding nothing amiss and placing all 20 compartments in service, our second startup was successful.

When the impromptu startup call from GRU dispatch was received September 19th, this was the prime opportunity to perform a visual opacity reading to help determine the true root cause. Immediately following each of the fan start sequences, a reddish-brown plume was observed with diminishing intensity. Again we shutdown the process to perform visual inspections as a six-minute opacity value of 15.91% was observed. All 20 compartments were in service at time of start and the visual inspection was conducted identically to the prior incident. There was no change to the condition or functionality of the equipment and systems as before. The one common difference of these two startups is the extended time offline and substantial rainfall events. It should also be noted in retrospect, that on the May 8th cold startup after a 7-day dispatch reserve shutdown and subsequent 14-day planned maintenance outage, we experienced a single period value of 17.87%. This further validates the correlation between offline duration relative to increased opacity.

Upon visual inspection of the baghouse outlet plenums, downstream ductwork and the stack proper, we discovered the stack drain was clogged with rust debris and similar debris and ash in the ID fan inlet – see attached photos. Post-inspection we started fans and experienced no opacity issues with a maximum value of 11.42%. Preparations are being made this week to vacuum out the minimal accumulations in the ductwork.

Our proposed solution is modifying the fan startup sequence and duration such that the initial velocity and vibration that may potentially dislodge any material is minimized. Material would be allowed to settle at the stack base to be removed at the next available opportunity. In addition, GREC will run the fans every week only as long as needed such that all future startup events will be compliant. We also plan to re-inspect all ductwork from the baghouse to the stack at the next three week interval.

Regards,

Ali Leaphart | Plant Engineer
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Email ali.leaphart@grecbiomass.com
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From: Kirts, Christopher [mailto:Christopher.Kirts@dep.state.fl.us]
Sent: Friday, September 25, 2015 9:49 AM
To: Ali Leaphart
Cc: Lovallo, Marc; Read, David; Fitzsimmons, Michael; Maher, Jim
Subject: GREC Opacity

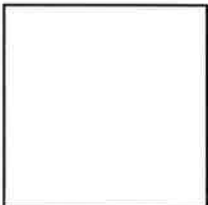
Thank you for meeting with us yesterday. We were glad to see all of the efforts the facility is undertaking to reduce potential odor events.

In relational to the recent opacity exceedances: How many times has the facility gone through a startup without an exceedance? Wasn't this most recent exceedance, the first opacity issue that you have had? What was really different with this startup? Was there a more prolonged downtime? Can rain waters accumulate in the exhaust duct work? You folks said that you think that it is possible that the duct work after the bag house has experienced some internal rusting. If you find this, please take pictures.

When you have experienced these issues, what sequence of events did you implement and what were the results?

Thank You

Air Compliance Section, Northeast District
email: Christopher.Kirts@dep.state.fl.us
904-256-1553
8800 Baymeadows Way West, Suite 100
Jacksonville Florida, 32256-7590



WEST AND EAST BAG HOUSE



DRAIN PLUGGED IN STACK ON SUB FLOOR

SCR 1



Ali Leaphart

From: Ali Leaphart
Sent: Wednesday, September 02, 2015 1:56 PM
To: Marc.Lovallo@dep.state.fl.us
Cc: Russell Abel; lenfagan@emienergy.com
Subject: RE: GREC Status

Marc,

Upon further inspection, all baghouse equipment is intact and functional. During the initial startup on the 28th, five of the baghouse compartments were isolated causing higher flow rates to the remaining compartments. We identified the correlation and initiated shutdown, opened the dampers and proceeded to an acceptable, second start. Our determination is the higher velocities and eddy currents may have dislodged fine particulate.

The purpose of our cold startup was to warm up the sand bed and the boiler to preserve the structural integrity and prevent corrosion by draining the boiler while hot, steaming out any residual moisture, and placing a nitrogen blanket on for extended lay-up.

If you have any questions, please give me a call.

Ali Leaphart | Plant Engineer
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From: Lovallo, Marc [mailto:Marc.Lovallo@dep.state.fl.us]
Sent: Monday, August 31, 2015 1:51 PM
To: Ali Leaphart
Cc: Russell Abel; lenfagan@emienergy.com
Subject: RE: GREC Status

Thanks Ali. Let me know when you have the results of the investigation. Also, could you please provide the explanation as to why the boiler had started up again? I apologize, I didn't write it down when we spoke on the phone.

Thanks

Marc

From: Ali.Leaphart@grecbiomass.com [mailto:Ali.Leaphart@grecbiomass.com]
Sent: Monday, August 31, 2015 12:05 PM
To: Lovallo, Marc

Cc: Russell.Abel@grecbiomass.com; lenfagan@emienergy.com

Subject: GREC Status

Marc,

Last Friday the 28th during a cold startup, we experienced two opacity period peaks (attached) and immediately shutdown and investigated. The following start was below limit, and we are entering the boiler for visual inspection as temperature allows.

As we discussed aside from the required, annual stack test in November, we may be offline for an unknown duration. I will keep you informed of any changes to plan.

Respectfully,

Ali Leaphart | Plant Engineer

NAES Corporation

Gainesville Renewable Energy Center

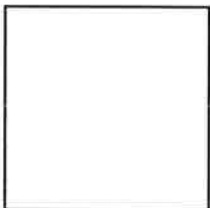
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Ali Leaphart

From: Ali Leaphart
Sent: Monday, August 31, 2015 12:05 PM
To: Marc.Lovallo@dep.state.fl.us
Cc: Russell Abel; lenfagan@emienergy.com
Subject: GREC Status
Attachments: Opacity 20_27 082815.pdf

Marc,

Last Friday the 28th during a cold startup, we experienced two opacity period peaks (attached) and immediately shutdown and investigated. The following start was below limit, and we are entering the boiler for visual inspection as temperature allows.

As we discussed aside from the required, annual stack test in November, we may be offline for an unknown duration. I will keep you informed of any changes to plan.

Respectfully,

Ali Leaphart | Plant Engineer

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Boiler Opacity 6 Minute SU/SD Exceedance Report

Facility Name: Gainesville
Source: Opac
Parameter: OPACITY

Location: Gainesville, FL
Limit: 20.00

Data in the Reporting Period: 7/1/2015 to 8/31/2015 11:59:59 PM

Inc. No.	Start Date	End Date	Duration Periods	Emission Reading	EPA Category	Reason for Incident	Corrective Action
1	08/28/2015 11:48	08/28/2015 11:59	2	37.78	Startup/Shutdown	Startup/Shutdown	Corrected Process Operation

Total Duration in the Reporting Period = 2 Periods

Total Operating Time in the Reporting Period = 9257 Periods

