



Department of Environmental Protection

Division of Air Resource Management

STATEMENT OF COMPLIANCE - TITLE V SOURCE

REASON FOR SUBMISSION (Check one to indicate why this statement of compliance is being submitted)

<input checked="" type="checkbox"/> Annual Requirement	<input type="checkbox"/> Transfer of Permit	<input type="checkbox"/> Permanent Facility Shutdown
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REPORTING PERIOD*	REPORT DEADLINE**
January 1 st through December 31 st of 2015 (year)	March 1 st

*The statement of compliance must cover all conditions that were in effect during the indicated reporting period, including any conditions that were added, deleted, or changed through permit revision.

**See Rule 62-213.440(3)(a)2., F.A.C.

Facility Owner/Company Name: Energy Management Inc.

Site Name: Gainesville Renewable Energy Center Facility ID No. 57241 / 0010131-006-AV County: Alachua

COMPLIANCE STATEMENT (Check only one of the following three options)

 A. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, and there were no reportable incidents of deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above.

 B. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part; however, there were one or more reportable incidents of deviations from applicable requirements associated with malfunctions or breakdowns of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above, which were reported to the Department. For each incident of deviation, the following information is included:

1. Date of report previously submitted identifying the incident of deviation.
2. Description of the incident.

 X C. This facility was in compliance with all terms and conditions of the Title V Air Operation Permit and, if applicable, the Acid Rain Part, EXCEPT those identified in the pages attached to this report and any reportable incidents of deviations from applicable requirements associated with malfunctions or breakdowns of process, fuel burning or emission control equipment, or monitoring systems during the reporting period identified above, which were reported to the Department. For each item of noncompliance, the following information is included:

1. Emissions unit identification number.
2. Specific permit condition number (note whether the permit condition has been added, deleted, or changed during certification period).
3. Description of the requirement of the permit condition.
4. Basis for the determination of noncompliance (for monitored parameters, indicate whether monitoring was continuous, i.e., recorded at least every 15 minutes, or intermittent).
5. Beginning and ending dates of periods of noncompliance.
6. Identification of the probable cause of noncompliance and description of corrective action or preventative measures implemented.
7. Dates of any reports previously submitted identifying this incident of noncompliance.


For each incident of deviation, as described in paragraph B. above, the following information is included:

1. Date of report previously submitted identifying the incident of deviation.
2. Description of the incident.

DEVIATION MONITORING REPORT - TITLE V SOURCE

RESPONSIBLE OFFICIAL CERTIFICATION

I, the undersigned, am a responsible official (Title V air permit application or responsible official notification form on file with the Department) of the Title V source for which this document is being submitted. With respect to all matters other than Acid Rain program requirements, I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and data contained in this document are true, accurate, and complete.



(Signature of Title V Source Responsible Official) 2/29/16

(Date)

Name: Leonard J. Fagan Title: VP Engineering, Asset Manager

DESIGNATED REPRESENTATIVE CERTIFICATION (only applicable to Acid Rain source)

I, the undersigned, am authorized to make this submission on behalf of the owners and operators of the Acid Rain source or Acid Rain units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.



(Signature of Acid Rain Source Designated Representative) 2/29/16

(Date)

Name: Leonard J. Fagan Title: VP Engineering, Asset Manager

{Note: Attachments, if required, are created by a responsible official or designated representative, as appropriate, and should consist of the information specified and any supporting records. Additional information may also be attached by a responsible official or designated representative when elaboration is required for clarity. This report is to be submitted to both the compliance authority (DEP district or local air program) and the U.S. Environmental Protection Agency (EPA) (U.S. EPA Region 4, Air and EPCRA Enforcement Branch, 61 Forsyth Street, Atlanta GA 30303).}

Exception Detail

	<u>NOx (lb/MMBtu)</u>	<u>Heat Input (MMBtu)</u>	<u>Opacity (%)</u>
Emissions unit identification number	BFB1 EU-002	BFB1 EU-002	BFB1 EU-002
Specific permit condition number	B.10, B.11	B.10	B.10, h
Description of the requirement of the permit condition	24-Hour Rolling Average in excess of 0.070 lb/MMBtu	4-Hour Rolling Average in excess of 1,358 MMBtu	6-minute block average
Basis for the determination of noncompliance	Continuous Monitoring	Continuous Monitoring	Continuous Monitoring
Beginning and ending dates of periods of noncompliance	01/12/2015 09:00 - 01/12/2015 14:59	01/26/2015 20:00 01/27/2015 04:00 01/28/2015 07:00 01/29/2015 06:00 02/03/2015 06:00 05/09/2015 11:00 06/13/2015 23:00 06/14/2015 05:00 07/14/2015 16:00	5/8/2015 0524 20.81% 5/8/2015 0530 17.87% 5/12/2015 1048 19.6% 6/8/2015 1300 10.23% 6/9/2015 1206 10.33% 8/28/2015 11:48 37.78% 8/28/2015 11:54 28.86%
Identification of the probable cause of noncompliance and description of corrective action or preventative measures implemented	False turbine condenser level indication, two warm restarts, decreased catalyst injection temperature permissive, maximized ammonia injection rate.	Air Construction Permit Revision – Effective Date July 31 st	Startup Startup Malfunction – Corrected Process Malfunction – Corrected Process Malfunction – Corrected Process Startup Startup & Shutdown
Dates of any reports previously submitted identifying this incident of noncompliance	January 13 th , April 24 th , May 11 th , July 30 th	July 30 th October 29 th	July 30 th August 31 st , September 2 nd , September 30 th , October 29 th , November 2 nd , February 18 th , 2016

Boiler NOx lb/MMBtu 24 Hour Rolling Exceedance Report

Facility Name: Gainesville
Source: BFB1
Parameter: NOx_RATE_P60

Location: Gainesville, FL

Limit: 0.070 Permit Condition B.10 & B.11, Continuous Monitoring.
 Reported 1/13, 4/24, 5/11 & 7/30.

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

Inc. No.	Start Date	End Date	Duration Hours	Emission Reading	EPA Category	Reason for Incident	Corrective Action
1	01/12/2015 09:00	01/12/2015 14:59	6	0.073	Process Problems	Malfunction	Corrected Process Operation

Total Duration in the Reporting Period = 6 Hours

Total Operating Time in the Reporting Period = 4463 Hours

Boiler NOx lb/mmBtu 30-Day Rolling Exceedance Report

Facility Name: Gainesville
 Source: BFB1
 Parameter: NOx_RATE_P60
 Location: Gainesville, FL
 Limit: 0.070

Data in the Reporting Period: 8/1/2015 to 12/31/2015 11:59:59 PM

Inc. No.	Start Date	End Date	Duration Hours	Emission Reading	EPA Category	Reason for Incident	Corrective Action
No Incidents found in this Reporting Period							

Total Duration in the Reporting Period = 0 Hours
 Total Operating Time in the Reporting Period = 435 Hours

Ali Leaphart

From: Ali Leaphart
Sent: Tuesday, January 13, 2015 3:59 PM
To: Marc.Lovallo@dep.state.fl.us; Woosley, Jerry (Jerry.Woosley@dep.state.fl.us)
Cc: Russell Abel; lenfagan@emienergy.com
Subject: GREC Event 1/12
Attachments: GREC_011115_011215.pdf

Marc,

Please find attached the requested information we discussed earlier today. Control signal issues caused two unit trips and subsequent two warm startups. Proactive operational steps taken minimizing overall impact included decreasing catalyst injection temperature permissive and maximizing ammonia injection rate.

If you have any questions please let me know,

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



Ali Leaphart

From: Lovallo, Marc <Marc.Lovallo@dep.state.fl.us>
Sent: Monday, February 09, 2015 1:38 PM
To: Ali Leaphart
Subject: RE: GREC Startup / Event 1/12 Update

Hi Ali,

This is fine. We are still planning on talking with our Tallahassee folks (hopefully this week) to determine how to handle these excess emissions. I will keep you informed.

Marc

From: Ali.Leaphart@grecbiomass.com [<mailto:Ali.Leaphart@grecbiomass.com>]
Sent: Monday, February 09, 2015 1:33 PM
To: Lovallo, Marc
Subject: RE: GREC Startup / Event 1/12 Update

Marc,

I just wanted to follow up and confirm the additional detail below was satisfactory to your request. Please let me know if you need any further information.

Thank you,

Ali Leaphart | Plant Engineer
NAES Corporation
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Email ali.leaphart@grecbiomass.com
www.naes.com



From: Ali Leaphart
Sent: Friday, January 30, 2015 12:26 PM
To: 'Lovallo, Marc'; Woosley, Jerry; Kirts, Christopher; Read, David (David.Read@dep.state.fl.us)
Cc: Russell Abel; lenfagan@emienergy.com; Andrew Bass (abass@ectinc.com); David Dee (ddee@gbwlegal.com)
Subject: RE: GREC Startup / Event 1/12 Update

Good Afternoon,

As we discussed, the events of January 11th and 12th were due to a false turbine condenser level indication that resulted in two unit trips and warm/hot starts. During this event, the boiler remained offline until all necessary troubleshooting was completed to ensure the signal was correct, and a unit startup would be environmentally successful.

It should be noted the corrective actions mutually agreed upon in Mr. Maher's July 18th email attachment were precisely executed by GREC. In addition to increasing the SCR ammonia injection flow rate to maximize NOx reduction for more than 13 hours, GREC also lowered the catalyst temperature permissive to 350° thereby injecting ammonia sooner to further minimize the event duration. The long-term corrective action was agreed to be resolved by submission of a permit revision to address these very situations. Prior to this event, GREC and the Department had agreed to convene on January 22nd to finalize permit application details, and this effort presently continues.

Ali Leaphart | Plant Engineer

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From: Lovallo, Marc [<mailto:Marc.Lovallo@dep.state.fl.us>]

Sent: Thursday, January 29, 2015 9:42 AM

To: Ali Leaphart; Woosley, Jerry; Kirts, Christopher

Subject: RE: GREC Startup

Hi Ali,

Any update on that more detailed malfunction report concerning the 10 hours of excess NOx emissions the plant had earlier this month?

Marc

From: Ali.Leaphart@grecbiomass.com [<mailto:Ali.Leaphart@grecbiomass.com>]

Sent: Tuesday, January 20, 2015 7:12 AM

To: Lovallo, Marc; Woosley, Jerry; Kirts, Christopher

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

Subject: GREC Startup

Good Morning,

We had fires in the boiler at 0054 this morning and will be at baseload operation this afternoon.

Ali Leaphart | Plant Engineer

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Ali Leaphart

From: Lovallo, Marc <Marc.Lovallo@dep.state.fl.us>
Sent: Thursday, April 30, 2015 4:08 PM
To: Ali Leaphart
Subject: RE: GREC Startup / Event 1/12 Update

Hi Ali,

I wanted to confirm with you that the excess NOx emissions that occurred at the GREC facility on Jan 11th and 12th was determined to be a violation of the Air permit. To address the matter, we asked that GREC submit an Air construction permit application that would include exclusions being allowed for excess emissions occurring from warm startups due to a malfunction. Tallahassee has received the application and is currently working on it. Our compliance team further discussed this and determined the application submittal would be a satisfactory resolution to the non-compliance. The case was closed without enforcement and no further action is warranted. Let me know if you have any questions.

Marc A. Lovallo
Environmental Specialist
Compliance Assurance
Florida Department of Environmental Protection
Phone: (904) 256-1566
Fax: (904) 256-1590
marc.lovallo@dep.state.fl.us

From: Ali.Leaphart@grecbiomass.com [mailto:Ali.Leaphart@grecbiomass.com]
Sent: Monday, February 09, 2015 1:33 PM
To: Lovallo, Marc
Subject: RE: GREC Startup / Event 1/12 Update

Marc,

I just wanted to follow up and confirm the additional detail below was satisfactory to your request. Please let me know if you need any further information.

Thank you,

Ali Leaphart | Plant Engineer
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Gainesville Renewable Energy Center
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Boiler Opacity 6 Minute SU/SD Exceedance Report

Facility Name: Gainesville
 Source: Opac
 Parameter: OPACITY

Location: Gainesville, FL

Limit: 27% Permit Condition B.10, h, Continuous Monitoring
 Reported 8/31, 9/2, 9/30, 10/29, 11/2

Data in the Reporting Period: 1/1/2015 to 12/31/2015 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 = 49367 Periods

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
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Gainesville Renewable Energy Center
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Cell 352.529.7522
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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

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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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.

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.

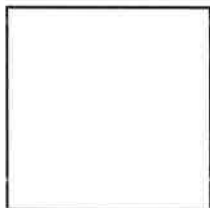
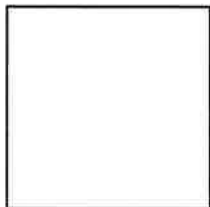
Monique Jordan

Florida Department of Environmental Protection

Northeast District

8800 Baymeadows Way West, Suite 100

Jacksonville, Florida 32256



Ali Leaphart

From: Ali Leaphart
Sent: 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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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

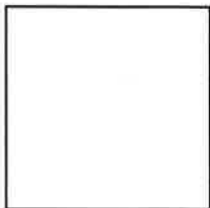
Thank you for meeting with us yesterday. We were glad to see all of the efforts the facility is undertaking to reduce potential odor events.

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



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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Email ali.leaphart@grecbiomass.com

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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.

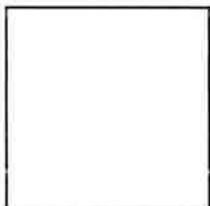
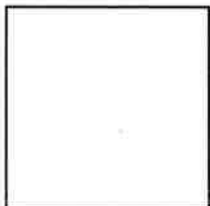
As we discussed aside from the required, annual stack test in November, we may be offline for an unknown duration. I will keep you informed of any changes to plan.

Respectfully,

Ali Leaphart | Plant Engineer

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Gainesville Renewable Energy Center
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Boiler Heat Input 4 Hour Rolling Exceedance Report

Facility Name: Gainesville
 Source: BFB1
 Parameter: HTIP_P60

Location: Gainesville, FL

Limit: 1,358.00 Permit Condition B.10, Continuous Monitoring

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

Inc. No.	Start Date	End Date	Duration Hours	Emission Reading	EPA Category	Reason for Incident	Corrective Action
1	01/26/2015 20:00	01/26/2015 20:59	1	1361.61	Other Known Causes	Load Ramp	TV Permit Modification
2	01/27/2015 04:00	01/27/2015 07:59	4	1369.17	Other Known Causes	Load Ramp	TV Permit Modification
3	01/28/2015 07:00	01/28/2015 09:59	3	1387.55	Other Known Causes	Load Ramp	TV Permit Modification
4	01/29/2015 06:00	01/29/2015 08:59	3	1387.42	Other Known Causes	Load Ramp	TV Permit Modification
5	02/03/2015 06:00	02/03/2015 08:59	3	1359.42	Other Known Causes	Load Ramp	TV Permit Modification
6	05/09/2015 11:00	05/09/2015 13:59	3	1412.03	Other Known Causes	Load Ramp	TV Permit Modification
7	06/13/2015 23:00	06/13/2015 23:59	1	1361.06	Other Known Causes	Load Ramp	TV Permit Modification
8	06/14/2015 05:00	06/14/2015 07:59	3	1373.05	Other Known Causes	Load Ramp	TV Permit Modification
9	07/14/2015 16:00	07/14/2015 20:59	5	1375.07	Other Known Causes	Load Ramp	TV Permit Modification

Total Duration in the Reporting Period = 26 Hours
 Total Operating Time in the Reporting Period = 4465 Hours

CEMS Semi-Annual Downtime Report

Facility Name: GREC BFB1 EU-002

Location: Gainesville, FL

Data in the Reporting Period: 1/1/2015 to 12/31/2015 11:59:59 PM

Channel	Start Date	End Date	Duration Period/Hour	Reason	EPA Downtime Category	Corrective Action
NOX, SO2, CO	01/07/2015 05:00	01/07/2015 08:59	4	Monitor Equipment Malfunction	Monitor Equipment Malfunction	Performed Corrective Maintenance - SOV115
Opacity	01/08/2015 22:18	01/08/2015 22:29	2	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown & Startup
Opacity	01/11/2015 21:12	01/11/2015 21:23	2	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown & Startup
Opacity	01/12/2015 00:42	01/12/2015 00:47	1	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown
Opacity	01/12/2015 06:12	01/12/2015 06:17	1	Other Known Causes	Other Known Causes	Incomplete Period - Startup
Opacity	01/12/2015 07:12	01/12/2015 07:17	1	Other Known Causes	Other Known Causes	Incomplete Period - Startup
Opacity	01/16/2015 06:42	01/16/2015 06:47	1	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown
SO2	02/05/2015 05:00	02/05/2015 05:59	1	Monitor Equipment Malfunction	Monitor Equipment Malfunction	Performed Corrective Maintenance - Regulator
Opacity	03/04/2015 07:12	03/04/2015 07:47	6	Other Known Causes	Other Known Causes	Missing Data - Flagging/Unrecoverable
Opacity	03/04/2015 08:42	03/04/2015 09:41	10	Other Known Causes	Other Known Causes	Missing Data - Time Adjustment
NOX, SO2, CO	03/04/2015 09:00	03/04/2015 09:59	1	Other Known Causes	Other Known Causes	Missing Data - Time Adjustment
NOX, SO2, CO	03/11/2015 11:00	03/11/2015 13:59	3	Calibration/QA	Calibration/QA	Quarterly Gas Audit
FLOW	03/18/2015 11:00	03/18/2015 11:59	1	Calibration/QA	Calibration/QA	In Maintenance - Flow
Opacity	03/18/2015 12:12	03/18/2015 12:29	3	Calibration/QA	Calibration/QA	Quarterly Filter Audit
Opacity	04/01/2015 18:06	04/01/2015 18:11	1	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown & Startup
Opacity	04/07/2015 10:06	04/07/2015 10:11	1	Other Known Causes	Other Known Causes	Data Restoration
Opacity	04/16/2015 18:06	04/16/2015 18:11	1	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown
Opacity	04/16/2015 18:36	04/16/2015 18:41	1	Other Known Causes	Other Known Causes	Incomplete Period - Startup
Opacity	04/16/2015 19:00	04/16/2015 19:11	2	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown & Startup
Opacity	04/17/2015 17:42	04/17/2015 17:53	2	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown & Startup
Opacity	04/17/2015 18:06	04/17/2015 18:11	1	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown
Opacity	04/17/2015 18:30	04/17/2015 18:35	1	Other Known Causes	Other Known Causes	Incomplete Period - Startup
Opacity	04/17/2015 20:06	04/17/2015 20:11	1	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown
Opacity	04/23/2015 16:12	04/23/2015 16:17	1	Other Known Causes	Other Known Causes	Incomplete Period - PA fan on for cooling
Opacity	04/23/2015 22:54	04/23/2015 22:59	1	Other Known Causes	Other Known Causes	Incomplete Period - PA fan off
Opacity	04/24/2015 10:36	04/24/2015 10:41	1	Other Known Causes	Other Known Causes	Incomplete Period - PA fan on for cooling
Opacity	04/24/2015 12:00	04/24/2015 12:05	1	Other Known Causes	Other Known Causes	Incomplete Period - PA fan off
Opacity	05/08/2015 05:24	05/08/2015 05:29	1	Other Known Causes	Other Known Causes	Incomplete Period - Startup
Opacity	05/08/2015 12:42	05/08/2015 12:47	1	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown
Opacity	05/08/2015 12:54	05/08/2015 12:59	1	Other Known Causes	Other Known Causes	Incomplete Period - Startup
Opacity	05/11/2015 11:24	05/11/2015 11:35	2	Calibration/QA	Calibration/QA	Quarterly Filter Audit
Opacity	06/06/2015 16:06	06/06/2015 16:11	1	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown
Opacity	06/06/2015 18:24	06/06/2015 18:29	1	Other Known Causes	Other Known Causes	Incomplete Period - Startup

Channel	Start Date	End Date	Duration Period/Hour	Reason	EPA Downtime Category	Corrective Action
Opacity	06/06/2015 23:36	06/06/2015 23:41	1	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown
Opacity	06/07/2015 08:36	06/07/2015 08:41	1	Other Known Causes	Other Known Causes	Incomplete Period - Startup
Opacity	06/07/2015 09:54	06/07/2015 09:59	1	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown
Opacity	06/07/2015 10:18	06/07/2015 10:23	1	Other Known Causes	Other Known Causes	Incomplete Period - Startup
Opacity	06/07/2015 13:24	06/07/2015 13:35	2	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown & Startup
Opacity	06/07/2015 16:18	06/07/2015 16:29	2	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown & Startup
NOX, SO2, CO	06/11/2015 11:00	06/11/2015 12:59	2	Calibration/QA	Calibration/QA	Quarterly Gas Audit
NOX, SO2, CO	06/11/2015 14:00	06/11/2015 14:59	1	Calibration/QA	Calibration/QA	Quarterly Gas Audit
Opacity	06/14/2015 11:00	06/14/2015 11:29	5	Other Known Causes	Other Known Causes	Incomplete Period - Power Loss
Opacity	06/15/2015 11:48	06/15/2015 11:59	2	Other Known Causes	Other Known Causes	Incomplete Period - Power Loss
Opacity	06/22/2015 12:30	06/22/2015 12:41	2	Other Known Causes	Other Known Causes	Incomplete Period - Power Loss
Opacity	06/22/2015 13:12	06/22/2015 13:29	3	Other Known Causes	Other Known Causes	Incomplete Period - Power Loss
Opacity	06/23/2015 10:54	06/23/2015 10:59	1	Other Known Causes	Other Known Causes	Incomplete Period - Power Loss
Opacity	06/23/2015 11:42	06/23/2015 11:53	2	Other Known Causes	Other Known Causes	Incomplete Period - Power Loss
Opacity	08/07/2015 19:00	08/07/2015 19:05	1	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown
Opacity	08/07/2015 20:30	08/07/2015 20:35	1	Other Known Causes	Other Known Causes	Incomplete Period - Dispatch Reserve Shutdown
Opacity	08/28/2015 12:42	08/28/2015 12:47	1	Other Known Causes	Other Known Causes	Incomplete Period - Startup
Opacity	08/28/2015 19:00	08/28/2015 19:05	1	Other Known Causes	Other Known Causes	Incomplete Period - Dispatch Reserve Shutdown
Opacity	09/19/2015 11:06	09/19/2015 11:11	1	Other Known Causes	Other Known Causes	Incomplete Period - Startup
Opacity	09/19/2015 11:18	09/19/2015 11:23	1	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown
Opacity	09/19/2015 12:18	09/19/2015 12:23	1	Other Known Causes	Other Known Causes	Incomplete Period - Startup
Opacity	09/20/2015 05:00	09/20/2015 05:05	1	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown
Opacity	09/20/2015 05:24	09/20/2015 05:29	1	Other Known Causes	Other Known Causes	Incomplete Period - Startup
Opacity	09/21/2015 13:06	09/21/2015 13:11	1	Other Known Causes	Other Known Causes	Incomplete Period - Dispatch Reserve Shutdown
Opacity	10/15/2015 10:12	10/15/2015 10:23	2	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
Opacity	10/22/2015 13:30	10/22/2015 13:41	2	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
Opacity	11/02/2015 14:00	11/02/2015 14:05	1	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
Opacity	11/03/2015 18:54	11/03/2015 18:59	1	Other Known Causes	Other Known Causes	Incomplete Period - Startup
NOX, SO2, CO	11/06/2015 11:00	11/06/2015 11:59	1	Calibration/QA	Calibration/QA	Quarterly Gas Audit (Q3)
Opacity	11/12/2015 05:24	11/12/2015 05:29	1	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown
Opacity	12/04/2015 13:24	12/04/2015 13:35	2	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
Opacity	12/11/2015 13:54	12/11/2015 13:59	1	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
Opacity	12/11/2015 14:06	12/11/2015 14:11	1	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
Opacity	12/16/2015 14:12	12/16/2015 14:17	1	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
Opacity	12/16/2015 14:42	12/16/2015 14:47	1	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
Opacity	12/31/2015 15:06	12/31/2015 15:17	2	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing

Total Downtime in the Reporting Period = 22.7 hours

2015 Annual NOx Exclusions – BFB1 EU-002

January 1st – December 31st

		<u>Hourly</u>	<u>Description</u>	<u>Corrective Action</u>
1/8 2300 – 1/9 0000	2	2300 – 0.229 0000 – 0.158	False turbine condenser level indication, trip	Warm restart, return to normal operation. Permit Condition; Appendix CEMS 19.a.
1/12 0700 – 0800	2	0700 – 0.265 0800 – 0.136	False turbine condenser level indication, two trips, offline troubleshooting	Two warm restarts, decreased catalyst injection temperature permissive, maximized ammonia injection rate for 13 hours, return to normal operation. Permit Condition; Appendix CEMS 19.a.
1/20 0400 - 1900	16	0400 – 0.091 0500 – 0.11 0600 – 0.11 0700 – 0.114 0800 – 0.13 0900 – 0.136 1000 – 0.2 1100 – 0.151 1200 – 0.14 1300 – 0.134 1400 – 0.133 1500 – 0.128 1600 – 0.133 1700 – 0.109 1800 – 0.086 1900 – 0.075	Cold Startup after Planned Maintenance Outage	Permit Condition: B.13.a, c.
5/8 1200 – 5/9 0000	13	0.095 0.093 0.096 0.107 0.113 0.114 0.116 0.174 0.243 0.259 0.255 0.168 0.121	Cold Startup after Planned Maintenance Outage	Permit Condition: B.13.a, c.

2015 Annual NOx Exclusions – BFB1 EU-002

January 1st – December 31st

		<u>Hourly</u>	<u>Description</u>	<u>Corrective Action</u>
4/16 1900 - 2000	2	0.168 0.131	Steam turbine control valve wiring fault	Repaired in-situ, warm start. Permit Condition; Appendix CEMS 19.a.
4/17 1900 - 2000	2	0.217 0.149	Steam turbine control valve wiring fault	Additional repair/replacement in progress when dispatched offline on reserve standby/availability. Permit Condition; Appendix CEMS 19.a.
6/6 1900 – 2000	2	0.168 0.163	Condenser Level Fluctuation/Trip	Repair/replacement and warm startup in progress when dispatched offline. Permit Condition; Appendix CEMS 19.a.
6/7 1300 - 2200	10	0.203 0.148 0.116 0.111 0.117 0.111 0.12 0.119 0.111 0.101	Cold Startup after Dispatched Offline	Permit Condition: B.13.a, c.
8/7 2000 – 2059	1	0.178	Unit Trip – Lightning Strike	Warm Re-Start Permit Condition: Appendix CEMS 19.a
8/10 1500 - 2259	8	1500 - 0.110 1600 - 0.114 1700 - 0.122 1800 - 0.105 1900 - 0.149 2000 - 0.123 2100 - 0.130 2200 - 0.103	Cold Startup	Permit Condition: B.13.a

2015 Annual NOx Exclusions – BFB1 EU-002

January 1st – December 31st

		<u>Hourly</u>	<u>Description</u>	<u>Corrective Action</u>
9/19 2200 – 9/20 1459	17	2200 - 0.15 2300 - 0.237 0000 - 0.254 0100 - 0.202 0200 - 0.174 0300 - 0.159 0400 - 0.112 0500 - 0.192 0600 - 0.138 0700 - 0.102 0800 - 0.081 0900 - 0.093 1000 - 0.093 1100 - 0.095 1200 - 0.107 1300 - 0.102 1400 - 0.094	Cold Startup	Permit Condition: B.13.a
11/4 0100 - 1900	18	0100 – 0.090 0200 – 0.089 0300 – 0.094 0400 – 0.104 0500 – 0.110 0600 – 0.117 0700 – 0.119 0800 – 0.179 0900 – 0.165 1000 – 0.107 1100 – 0.099 1200 – 0.100 1300 – 0.108 1400 – 0.112 1500 - 0.113 1600 - 0.117 1800 - 0.094 1900 - 0.101	Cold Startup	Permit Condition: B.13.a
Total	93			