

April 26, 2016

*Via Electronic Mail*

Marc A. Lovallo  
Environmental Specialist  
Compliance Assurance, Northeast District  
Florida Dept of Environmental Protection  
7777 Baymeadows Way W, Suite 100  
Jacksonville, FL 32256

Re: **Gainesville Renewable Energy Center, LLC (GREC)**  
**Air Permit No. 0010131-006-AV (PSD-FL-411)**  
**ORIS: 57241**  
**Q1 2016 Excess Emission Reports**

Dear Mr. Lovallo:

Below please find a summary of our 1<sup>st</sup> Quarter 2016 excess emission reports:

<u>Report</u>	<u>Duration/Comment</u>
NOx lb/mmBtu 30-day Summary	Compliant
NOX & CO lb/mmBtu Excess Emissions	34 hours
SO2 lb/mmBtu 24-hr Summary	Compliant
CO lb/mmBtu 30-day Summary	Compliant
Opacity 6 minute Summary	Compliant
NOX, SO2 TPY 12-Month Rolling	Compliant
NOX lb/MW/hr 30 day Summary	Compliant
SO2 lb/MW/hr 30 day Summary	Compliant
Steam Flow Production Summary	Compliant

The detailed reports are attached for your review. If you have any questions or require additional information, please contact the Plant Engineer, Ali Leaphart, at (386) 315-8019 or me at (617) 904-3100, ext. 122.

I certify, based on information and belief formed after reasonable inquiry, the statements and information in this report are true, accurate, and complete.

Sincerely,



Leonard J. Fagan  
Vice President of Engineering  
GREC Asset Manager

LJF/cw  
enclosures

**Continuous Emission Monitor Quarterly Report Summary**  
**Gaseous and Opacity Excess Emission and Monitoring System Performance**

Pollutant: NOx lb/MMBtu 30 Day EPA Report

Emission Limitation: 0.070

Analyzer Make/Model: CAI 600

Analyzer Serial Number: Y08012

Reporting Period Dates: From 01/01/2016 to 03/31/2016 23:59:59

Company Name: Gainesville

Address: 11201 NW 13th Street  
 Gainesville, FL 32653

Process Unit Description: Biomass Boiler

Date of Last CEMS Certification or Audit: 11/6/2014

Total Source Operating Time in Reporting Period: 53 Hours

**CMS Performance Summary**

1. CEMS downtime in reporting period due to:	Duration	% Unavailable <sup>1</sup>
1. Monitor Equipment Malfunctions	0	0.00 %
2. Non-Monitor CEMS Equipment Malfunctions	0	0.00 %
3. Calibration/QA	0	0.00 %
4. Other Known Causes	0	0.00 %
5. Unknown Causes	0	0.00 %
2. Total CEMS Downtime	0	0.00 % <sup>2</sup>

% Unavailable = CEMS Downtime during Source Operating Time/Source Operating Time x 100

**Emission Data Summary**

1. Duration of excess emissions in reporting period due to:	Duration	% Excess Emissions <sup>1</sup>
1. Startup/Shutdown	0	0.00 %
2. Control Equipment Problems	0	0.00 %
3. Process Problems	0	0.00 %
4. Other Known Causes	0	0.00 %
5. Unknown Causes	0	0.00 %
6. Unit Offline	0	0.00 %
2. Total duration of excess emissions.....	0	0.00 % <sup>2</sup>

% Excess Emissions = Total Duration of Excess Emissions/Source Operating Time x 100

<sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>2</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

**NOx & CO lb/MMBtu Excess Emissions – 1<sup>st</sup> Quarter, 2016**

Startup/Shutdown Exclusions:

	<b><u>CO Hourly</u></b>	<b><u>NOx Hourly</u></b>	<b><u>Description</u></b>	<b><u>Corrective Action</u></b>
3/6	1100 – 0.9 1200 – 1.378 1300 – 1.323 1400 – 1.21 1500 – 1.025 1600 – 0.83 1700 – 0.554 1800 – 0.452 1900 – 0.415 2000 – 0.297 2100 – 0.235 2200 – 0.43 2300 – 0.087 0000 – 0.334 0100 - 0.291 0200 - 0.355 0300 - 0.179 0400 - 0500 - 0600 –	13 Hours Common  0.087 0.099 0.093 0.083 0.083 0.095 0.105 0.13 0.243 0.302 0.291 0.286 0.246 0.22 0.132 0.082	Cold Startup	
3/7	17	16		
3/9	13 1600 – 0.946 1700 – 0.571 1800 – 0.465 1900 – 0.438 2000 – 0.33 2100 – 0.233 2200 – 0.307	6 Hours Common  0.08 0.087 0.08 0.088 0.103	Cold Startup	

**NOx & CO lb/MMBtu Excess Emissions – 1<sup>st</sup> Quarter, 2016**

3/10		2300 – 0.325	0.199		
		0000 –	0.13		
		0100 -	0.098		
		0200 -	0.088		
		0300 -	0.088		
		0400 –	0.086		
		8	11		
3/10	1	2100 – 0.564		Shutdown	
<b>Total</b>	<b>34</b>				

Total Quarterly Excluded Hours = 34

Total 12-month Rolling Excluded Hours, Ending 1<sup>st</sup> Quarter = 107

**Continuous Emission Monitor Quarterly Report Summary**  
**Gaseous and Opacity Excess Emission and Monitoring System Performance**

Pollutant: SO2 lb/MMBtu 24 Hour EPA Report

Emission Limitation: 0.029

Analyzer Make/Model: CAI 600

Analyzer Serial Number: Z01006

Reporting Period Dates: From 01/01/2016 to 03/31/2016 23:59:59

Company Name: Gainesville

Address: 11201 NW 13th Street  
 Gainesville, FL 32653

Process Unit Description: Biomass Boiler

Date of Last CEMS Certification or Audit: 11/6/2014

Total Source Operating Time in Reporting Period: 53 Hours

**CMS Performance Summary**

1. CEMS downtime in reporting period due to:	Duration	% Unavailable <sup>1</sup>
1. Monitor Equipment Malfunctions	0	0.00 %
2. Non-Monitor CEMS Equipment Malfunctions	0	0.00 %
3. Calibration/QA	0	0.00 %
4. Other Known Causes	0	0.00 %
5. Unknown Causes	0	0.00 %
2. Total CEMS Downtime	0	0.00 % <sup>2</sup>

% Unavailable = CEMS Downtime during Source Operating Time/Source Operating Time x 100

**Emission Data Summary**

1. Duration of excess emissions in reporting period due to:	Duration	% Excess Emissions <sup>1</sup>
1. Startup/Shutdown	0	0.00 %
2. Control Equipment Problems	0	0.00 %
3. Process Problems	0	0.00 %
4. Other Known Causes	0	0.00 %
5. Unknown Causes	0	0.00 %
6. Unit Offline	0	0.00 %
2. Total duration of excess emissions.....	0	0.00 % <sup>2</sup>

% Excess Emissions = Total Duration of Excess Emissions/Source Operating Time x 100

<sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>2</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

**Continuous Emission Monitor Quarterly Report Summary**  
**Gaseous and Opacity Excess Emission and Monitoring System Performance**

Pollutant: CO lb/MMBtu 30 Day EPA Report

Emission Limitation: 0.080

Analyzer Make/Model: CAI 601

Analyzer Serial Number: Z01007

Reporting Period Dates: From 01/01/2016 to 03/31/2016 23:59:59

Company Name: Gainesville

Address: 11201 NW 13th Street  
 Gainesville, FL 32653

Process Unit Description: Biomass Boiler

Date of Last CEMS Certification or Audit: 11/6/2014

Total Source Operating Time in Reporting Period: 53 Hours

**CMS Performance Summary**

1. CEMS downtime in reporting period due to:	Duration	% Unavailable <sup>1</sup>
1. Monitor Equipment Malfunctions	0	0.00 %
2. Non-Monitor CEMS Equipment Malfunctions	0	0.00 %
3. Calibration/QA	0	0.00 %
4. Other Known Causes	0	0.00 %
5. Unknown Causes	0	0.00 %
2. Total CEMS Downtime	0	0.00 % <sup>2</sup>

% Unavailable = CEMS Downtime during Source Operating Time/Source Operating Time x 100

**Emission Data Summary**

1. Duration of excess emissions in reporting period due to:	Duration	% Excess Emissions <sup>1</sup>
1. Startup/Shutdown	0	0.00 %
2. Control Equipment Problems	0	0.00 %
3. Process Problems	0	0.00 %
4. Other Known Causes	0	0.00 %
5. Unknown Causes	0	0.00 %
6. Unit Offline	0	0.00 %
2. Total duration of excess emissions.....	0	0.00 % <sup>2</sup>

% Excess Emissions = Total Duration of Excess Emissions/Source Operating Time x 100

<sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>2</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

# Continuous Emission Monitor Quarterly Report Summary

## Gaseous and Opacity Excess Emission and Monitoring System Performance

Pollutant: Opacity 6 Minute >10/20 EPA Report

Emission Limitation: 10.00

Analyzer Make/Model: DURAG D-R 290

Analyzer Serial Number: 1220055

Reporting Period Dates: From 1/1/2016 to 3/31/2016 11:59:59 PM

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Company Name: Gainesville

Address: 11201 NW 13th Street

Gainesville, FL 32653

Process Unit Description: Boiler Opacity

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Date of Last CEMS Certification or Audit: 11/6/2014

Total Source Operating Periods: 544 Periods

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### CMS Performance Summary

1. CEMS downtime in reporting period due to:	Duration	% Unavailable <sup>1</sup>
1. Monitor Equipment Malfunctions	0	0.00 %
2. Non-Monitor CEMS Equipment Malfunctions	0	0.00 %
3. Calibration/QA	0	0.00 %
4. Other Known Causes	20	3.68 %
5. Unknown Causes	0	0.00 %
2. Total CEMS Downtime	20	3.68 % <sup>2</sup>

% Unavailable = CEMS Downtime during Source Operating Periods/Source Operating Periods x 100

### Emission Data Summary

1. Duration of excess emissions in reporting period due to:	Duration	% Excess Emissions <sup>1</sup>
1. Startup/Shutdown	0	0.00 %
2. Control Equipment Problems	0	0.00 %
3. Process Problems	0	0.00 %
4. Other Known Causes	0	0.00 %
5. Unknown Causes	0	0.00 %
6. Unit Offline	0	0.00 %
2. Total duration of excess emissions.....	0	0.00 % <sup>2</sup>

% Excess Emissions = Total Excess Emission Periods/Source Operating Periods x 100

<sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>2</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating periods or the total CMS downtime is 5 percent or greater of the total operating periods, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

**Continuous Emission Monitor Quarterly Report Summary**  
**Gaseous and Opacity Excess Emission and Monitoring System Performance**

Pollutant: Opacity 6 Minute >20/27 EPA Report

Emission Limitation: 20.00

Analyzer Make/Model: DURAG D-R 290

Analyzer Serial Number: 1220055

Reporting Period Dates: From 1/1/2016 to 3/31/2016 11:59:59 PM

Company Name: Gainesville

Address: 11201 NW 13th Street  
 Gainesville, FL 32653

Process Unit Description: Boiler Opacity

Date of Last CEMS Certification or Audit: 11/6/2014

Total Source Operating Periods: 544 Periods

**CMS Performance Summary**

1. CEMS downtime in reporting period due to:	Duration	% Unavailable <sup>1</sup>
1. Monitor Equipment Malfunctions	0	0.00 %
2. Non-Monitor CEMS Equipment Malfunctions	0	0.00 %
3. Calibration/QA	0	0.00 %
4. Other Known Causes	20	3.68 %
5. Unknown Causes	0	0.00 %
2. Total CEMS Downtime	20	3.68 % <sup>2</sup>

% Unavailable = CEMS Downtime during Source Operating Periods/Source Operating Periods x 100

**Emission Data Summary**

1. Duration of excess emissions in reporting period due to:	Duration	% Excess Emissions <sup>1</sup>
1. Startup/Shutdown	0	0.00 %
2. Control Equipment Problems	0	0.00 %
3. Process Problems	0	0.00 %
4. Other Known Causes	0	0.00 %
5. Unknown Causes	0	0.00 %
6. Unit Offline	0	0.00 %
2. Total duration of excess emissions.....	0	0.00 % <sup>2</sup>

% Excess Emissions = Total Excess Emission Periods/Source Operating Periods x 100

<sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>2</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating periods or the total CMS downtime is 5 percent or greater of the total operating periods, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.



# Boiler Opacity 6 Minute Downtime Report

Facility Name: Gainesville  
 Source: Opac  
 Parameter: OPACITY

Location: Gainesville, FL

Data in the Reporting Period: 1/1/2016 to 3/31/2016 11:59:59 PM

Incid. No.	Start Date	End Date	Duration Periods	Reason	EPA Downtime Category	Corrective Action
1	01/08/2016 12:30	01/08/2016 12:41	2	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
2	01/12/2016 09:54	01/12/2016 10:05	2	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
3	01/29/2016 13:18	01/29/2016 13:29	2	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
4	02/05/2016 13:18	02/05/2016 13:23	1	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
5	02/12/2016 13:18	02/12/2016 13:29	2	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
6	02/22/2016 14:12	02/22/2016 14:17	1	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
7	02/27/2016 16:30	02/27/2016 16:35	1	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
8	03/03/2016 14:54	03/03/2016 15:05	2	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
9	03/06/2016 11:06	03/06/2016 11:11	1	Other Known Causes	Other Known Causes	Incomplete Period - Startup
10	03/07/2016 09:48	03/07/2016 09:53	1	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown
11	03/09/2016 16:12	03/09/2016 16:17	1	Other Known Causes	Other Known Causes	Incomplete Period - Startup
12	03/09/2016 21:18	03/09/2016 21:23	1	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown
13	03/09/2016 21:36	03/09/2016 21:41	1	Other Known Causes	Other Known Causes	Incomplete Period - Startup
14	03/10/2016 22:06	03/10/2016 22:11	1	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown
15	03/21/2016 12:30	03/21/2016 12:35	1	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing

Total Downtime in the Reporting Period = 20 Periods  
 Total Operating Time in the Reporting Period = 544 Periods  
 Data Availability for this Reporting Period = 96.32 %

# Monthly & 12-Month Rolling Report

**Company:** Gainesville Renewable Energy Center, LLC

11201 NW 13th Street

Gainesville, FL 32653

**Source:** EU-002

**Data Group:** All Data Groups

**Report Name:** Summary: Monthly and 12-Month Rolling  
Totals

4/1/2015 00:00

3/31/2016 23:59

**Start of Report:**

**End of Report:**

	NOx Tons/month	SO2 Tons/month	NOx 12-Month Rolling	SO2 12-Month Rolling
4/01/2015 00:00	13.66	0.00	252.36	0.14
5/01/2015 00:00	19.45	0.00	258.61	0.14
6/01/2015 00:00	25.21	0.14	265.42	0.28
7/01/2015 00:00	27.29	0.00	269.91	0.19
8/01/2015 00:00	6.22	0.00	250.93	0.17
9/01/2015 00:00	1.54	0.00	229.37	0.14
10/01/2015 00:00	0.00	0.00	216.45	0.14
11/01/2015 00:00	7.06	0.00	196.54	0.14
12/01/2015 00:00	0.00	0.00	169.53	0.14
1/01/2016 00:00	0.00	0.00	148.56	0.14
2/01/2016 00:00	0.00	0.00	125.43	0.14
3/01/2016 00:00	1.48	0.00	101.94	0.14

**Continuous Emission Monitor Quarterly Report Summary**  
**Gaseous and Opacity Excess Emission and Monitoring System Performance**

Pollutant: NOx lb/MW hr 30 Day EPA Report

Emission Limitation: 1.00

Analyzer Make/Model: CAI 600

Analyzer Serial Number: Y08012

Reporting Period Dates: From 01/01/2016 to 03/31/2016 23:59:59

Company Name: Gainesville

Address: 11201 NW 13th Street  
 Gainesville, FL 32653

Process Unit Description: Biomass Boiler

Date of Last CEMS Certification or Audit: 11/6/2014

Total Source Operating Time in Reporting Period: 53 Hours

**CMS Performance Summary**

1. CEMS downtime in reporting period due to:	Duration	% Unavailable <sup>1</sup>
1. Monitor Equipment Malfunctions	0	0.00 %
2. Non-Monitor CEMS Equipment Malfunctions	0	0.00 %
3. Calibration/QA	0	0.00 %
4. Other Known Causes	0	0.00 %
5. Unknown Causes	0	0.00 %
2. Total CEMS Downtime	0	0.00 % <sup>2</sup>

% Unavailable = CEMS Downtime during Source Operating Time/Source Operating Time x 100

**Emission Data Summary**

1. Duration of excess emissions in reporting period due to:	Duration	% Excess Emissions <sup>1</sup>
1. Startup/Shutdown	0	0.00 %
2. Control Equipment Problems	0	0.00 %
3. Process Problems	0	0.00 %
4. Other Known Causes	0	0.00 %
5. Unknown Causes	0	0.00 %
6. Unit Offline	0	0.00 %
2. Total duration of excess emissions.....	0	0.00 % <sup>2</sup>

% Excess Emissions = Total Duration of Excess Emissions/Source Operating Time x 100

<sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>2</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

**Continuous Emission Monitor Quarterly Report Summary**  
**Gaseous and Opacity Excess Emission and Monitoring System Performance**

Pollutant: SO2 lb/MWhr 30 Day EPA Report

Emission Limitation: 1.40

Analyzer Make/Model: CAI 600

Analyzer Serial Number: Z01006

Reporting Period Dates: From 01/01/2016 to 03/31/2016 23:59:59

Company Name: Gainesville

Address: 11201 NW 13th Street  
 Gainesville, FL 32653

Process Unit Description: Biomass Boiler

Date of Last CEMS Certification or Audit: 11/6/2014

Total Source Operating Time in Reporting Period: 53 Hours

**CMS Performance Summary**

1. CEMS downtime in reporting period due to:	Duration	% Unavailable <sup>1</sup>
1. Monitor Equipment Malfunctions	0	0.00 %
2. Non-Monitor CEMS Equipment Malfunctions	0	0.00 %
3. Calibration/QA	0	0.00 %
4. Other Known Causes	0	0.00 %
5. Unknown Causes	0	0.00 %
2. Total CEMS Downtime	0	0.00 % <sup>2</sup>

% Unavailable = CEMS Downtime during Source Operating Time/Source Operating Time x 100

**Emission Data Summary**

1. Duration of excess emissions in reporting period due to:	Duration	% Excess Emissions <sup>1</sup>
1. Startup/Shutdown	0	0.00 %
2. Control Equipment Problems	0	0.00 %
3. Process Problems	0	0.00 %
4. Other Known Causes	0	0.00 %
5. Unknown Causes	0	0.00 %
6. Unit Offline	0	0.00 %
2. Total duration of excess emissions.....	0	0.00 % <sup>2</sup>

% Excess Emissions = Total Duration of Excess Emissions/Source Operating Time x 100

<sup>1</sup> For opacity, record all times in minutes. For gases, record all times in hours.

<sup>2</sup> For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in §60.7(c) shall be submitted.

# Steam Flow 4-HR Rolling Exceedance Report

Facility Name: Gainesville      Location: Gainesville, FL  
 Source: BFB1  
 Parameter: STEAM      Limit: 930.00

Data in the Reporting Period: 1/1/2016 to 3/31/2016 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 = 53 Hours