October 31, 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** 

**Q3 2016 Excess Emission Reports** 

Dear Mr. Lovallo:

Below please find a summary of our 3<sup>rd</sup> Quarter 2016 excess emission reports:

<u>keport</u>	<u>Duration/Commen</u>
NOx lb/mmBtu 30-day Summary	Compliant
CO lb/mmBtu 30-day Summary	Compliant
NOX & CO lb/mmBtu Excess Emissions	19 hours
SO2 lb/mmBtu 24-hr Summary	Compliant
Opacity 6 minute Summary	Compliant
NOX, SO2 TPY 12-Month Rolling	Compliant
NOX lb/MWhr 30 day Summary	Compliant
SO2 lb/MWhr 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,

Vice President of Engineering

**GREC** Asset Manager

LJF/cw enclosures

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 07/01/2016 to 09/30/2016 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: 39 Hours

### **CMS** Performance Summary

1. CEMS downtime in reporting period due to:	Duration	% Unavailable
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 % 2

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

### **Emission Data Summary**

Duration of excess emissions in reporting period due to:	Duration	% Excess Emissions
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 % 2

<sup>%</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.

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.

Pollutant: CO lb/MMBtu 30 Day EPA Report

Emission Limitation: 0.080

Analyzer Make/Model: Analyzer Serial Number: Z01007

Reporting Period Dates: From 07/01/2016 to 09/30/2016 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: 39 Hours

### **CMS Performance Summary**

1. CEMS downtime in reporting period due to:	Duration	% Unavailable
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 % 2

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

### **Emission Data Summary**

<ol> <li>Duration of excess emissions in reporting period due to:</li> </ol>	Duration	% Excess Emissions
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 % 2

<sup>%</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>&</sup>lt;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 – 3rd Quarter, 2016

### Startup/Shutdown Exclusions:

		CO Hourly	NOX Hourly	Description	Corrective Action
9/29	19	0900 - 1.39		Cold Startup	Permit Condition:
		1000 - 0.923			B.13.a
		1100-0.932			
		1200 – 1.196			
		1400 - 0.794			
		1500 - 0.67			
		1600 - 0.715			
		1700 - 0.44			
		1800 - 0.309			
		1900 - 0.344			
		2000 - 0.405			
		2100-0.322	0.138 7 Hours Common		
		2200-0.091	0.269		
		2300-0.319	0.232		
9/30		0000 - 0.362	0.23		
		0100 - 0.248	0.221		
		0200 - 0.285	0.23		
		0300 - 0.136	0.213		
		0400 -	0.122		
		0500 - 0.101			
		(			
		19	×		
Total	19				

### Malfunction:

		CO Hourly	NOX Hourly	Description	Corrective Action
9/30	2	0700 – 0.242 0800 – 0.223		Boiler Trip	Permit Condition: Appendix CEMS 19.a
Total	2				ruel blending

# NOx & CO lb/MMBtu Excess Emissions – 3<sup>rd</sup> Quarter, 2016

Total Quarterly Excluded Hours = 21

Total 12-month Rolling Excluded Hours, Ending 3<sup>rd</sup> Quarter = 92

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 07/01/2016 to 09/30/2016 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: 39 Hours

### **CMS** Performance Summary

1. CEMS downtime in reporting period due to:	Duration	% Unavailable 1
1. Monitor Equipment Malfunctions	0	0.00 %
2. Non-Monitor CEMS Equipment Malfunctions	0	0.00 %
3. Calibration/QA	3	7.69 %
4. Other Known Causes	0	0.00 %
5. Unknown Causes	0	0.00 %
2. Total CEMS Downtime	3	7.69 % <sup>2</sup>

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

### **Emission Data Summary**

<ol> <li>Duration of excess emissions in reporting period due to:</li> </ol>	Duration	% Excess Emissions
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 % 2

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

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

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.

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## Boiler SO2 lb/MMBtu 1 Hour Downtime Report

Location: Gainesville, FL

Facility Name: Gainesville

BFB1

Source:

SO2\_RATE\_P60 Parameter:

Data in the Reporting Period: 07/01/2016 00:00 to 09/30/2016 23:59

Corrective Action	Performed Another Calibration
EPA Downtime Category	Calibration/QA
Reason	Calibration Drift
Duration Hours	8
End Date	09/30/2016 14:59
Start Date	09/30/2016 12:00
Incid. No.	

Total Downtime in the Reporting Period = 3 Hours

Data Availability for this Reporting Period = 92.31 %

Total Operating Time in the Reporting Period = 39 Hours

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 07/01/2016 to 09/30/2016 23:59:59

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:** 

408 Periods

### **CMS** Performance Summary

1. CEMS downtime in reporting period due to:	Duration	% Unavailable
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	15	3.68 %
5. Unknown Causes	0	0.00 %
2. Total CEMS Downtime	15	3.68 % <sup>2</sup>

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

### **Emission Data Summary**

<ol> <li>Duration of excess emissions in reporting period due to:</li> </ol>	Duration	% Excess Emissions
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 % 2

<sup>%</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>&</sup>lt;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.

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 07/01/2016 to 09/30/2016 23:59:59

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:** 

408 Periods

### **CMS** Performance Summary

1. CEMS downtime in reporting period due to:	Duration	% Unavailable
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	15	3.68 %
5. Unknown Causes	0	0.00 %
2. Total CEMS Downtime	15	3.68 % <sup>2</sup>

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

### **Emission Data Summary**

Duration of excess emissions in reporting period due to:	Duration	% Excess Emissions
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 % 2

<sup>%</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>&</sup>lt;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

Location: Gainesville, FL

Page 1 of 1

Facility Name: Gainesville

Opac Source:

OPACITY Parameter: Data in the Reporting Period: 07/01/2016 00:00 to 09/30/2016 23:59

Incid. No.	Start Date	End Date	<b>Duration Periods</b>	Reason	EPA Downtime Category	Corrective Action
1	07/05/2016 13:24	07/05/2016 13:35	2	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
2	07/19/2016 12:54	07/19/2016 12:59	1	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
3	08/01/2016 12:30	08/01/2016 12:35	1	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
4	08/01/2016 12:42	08/01/2016 12:47	1	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
5	08/16/2016 12:06	08/16/2016 12:17	2	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
9	09/07/2016 12:12	09/07/2016 12:17	1	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
7	09/07/2016 12:24	09/07/2016 12:29	T	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
8	09/19/2016 12:30	09/19/2016 12:35	1	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
6	09/19/2016 12:48	09/19/2016 12:53	1	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
10	09/19/2016 13:12	09/19/2016 13:17	I	Other Known Causes	Other Known Causes	Incomplete Period - Equipment Testing
11	09/29/2016 08:54	09/29/2016 08:59	1	Other Known Causes	Other Known Causes	Incomplete Period - Startup
12	09/30/2016 07:30	09/30/2016 07:35	1	Other Known Causes	Other Known Causes	Incomplete Period - Shutdown
13	09/30/2016 07:42	09/30/2016 07:47	1	Other Known Causes	Other Known Causes	Incomplete Period - Startup

Total Downtime in the Reporting Period = 15 Periods

Total Operating Time in the Reporting Period = 408 Periods

Data Availability for this Reporting Period = 96.32 %

### Monthly & 12-Month Rolling Report

Gainesville Renewable Energy Center, LLC

Company:

11201 NW 13th Street

Gainesville, FL 32653

EU-002

Source:

All Data Groups

Summary: Monthly and 12-Month Rolling Totals

Start of Report: End of Report:

Report Name: Data Group:

10/1/2015 00:00 9/30/2016 23:59

	NOZ	S02	NOX	502
	Tons/month	Tons/month	12-Month	12-Month
			Rolling	Rolling
10/01/2015 00:00	00.00	00.00	216.45	0.14
11/01/2015 00:00	7.06	0.00	196.54	0.14
12/01/2015 00:00	00.00	0.00	169.53	0.14
1/01/2016 00:00	00.00	0.00	148.56	0.14
2/01/2016 00:00	00.00	0.00	125.43	0.14
3/01/2016 00:00	1.49	0.00	101.95	0.14
04/01/2016 00:00	00.00	0.00	88.29	0.14
05/01/2016 00:00	1.11	0.00	69.95	0.14
06/01/2016 00:00	00.00	0.00	44.74	00.00
07/01/2016 00:00	00.00	00.00	17.45	00.00

0.00 0.00

11.23 10.91

0.00

0.00 1.22

08/01/2016 00:00 09/01/2016 00:00

Pollutant: NOx lb/MWhr 30 Day EPA Report

Emission Limitation: 1.00

Analyzer Make/Model: **CAI 600** Analyzer Serial Number: Y08012

Reporting Period Dates: From 07/01/2016 to 09/30/2016 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: 39 Hours

### CMS Performance Summary

1. CEMS downtime in reporting period due to:	Duration	% Unavailable
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 % 2

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

### **Emission Data Summary**

<ol> <li>Duration of excess emissions in reporting period due to:</li> </ol>	Duration	% Excess Emissions
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 % 2

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

For opacity, record all times in minutes. For gases, record all times in hours.

<sup>&</sup>lt;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.

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 07/01/2016 to 09/30/2016 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: 39 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	3	7.69 %
4. Other Known Causes	0	0.00 %
5. Unknown Causes	0	0.00 %
2. Total CEMS Downtime	3	7.69 % <sup>2</sup>

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

### **Emission Data Summary**

<ol> <li>Duration of excess emissions in reporting period due to:</li> </ol>	Duration	% Excess Emissions
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 % 2

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

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

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.

### Boiler SO2 lb/MWhr 1 Hour Downtime Report

Location: Gainesville, FL

Facility Name: Gainesville

BFB1 Source:

SO2\_LB/MWHR Parameter: Data in the Reporting Period: 07/01/2016 00:00 to 09/30/2016 23:59

Incid. No.	Start Date	End Date	Duration Hours	Reason	EPA Downtime Category	Corrective Action
-	09/30/2016 12:00	09/30/2016 14:59	က	Calibration Drift	Calibration/QA	Performed Another Calibration

Total Downtime in the Reporting Period = 3 Hours

Total Operating Time in the Reporting Period = 39 Hours

Data Availability for this Reporting Period = 92.31 %

## Steam Flow 4-HR Rolling Exceedance Report

Location: Gainesville, FL

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Facility Name: Gainesville

Source: BFB1

Parameter: STEAM

Limit:

930

Data in the Reporting Period: 07/01/2016 00:00 to 09/30/2016 23:59

Inc.	Start Date	End Date	Duration	Average	EPA Category	Reason for Incident	Corrective Action

No Incidents in the Reporting Period

Total Duration in the Reporting Period = 0 Hours

Total Operating Time in the Reporting Period = 39 Hours