



Global Property Engineering

175 Water Street, 29th Floor, New York, NY 10038

Gainesville Renewable Energy Center

11201 NW 13th Street
Gainesville, FL 32653



PROPERTY LOSS CONTROL SURVEY REPORT

June 24, 2015

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SUMMARY INFORMATION

RFS No.	5921-1
Survey date	June 24, 2015
Previous Survey	May 14, 2014
Engineer	Art Partin
EER Writing Office	Hartford, CT
Owner	Energy Management, Inc. Gainesville Renewable Energy Center (GREC), LLP
Operator	North American Energy Services
Location Address	11201 NW 13th Street (aka US 441) Gainesville, FL 32653
Web site	www.emienergy.com www.naes.com
Plant Type	IPP – Biomass Plant
Site Contacts Name, Title, Phone and Email	Russell Abel, Plant Manager (386) 315-8014 Russell.Abel@grecbiomass.com Steven Marsh, Operations Supervisor (386) 315-8015 Steven.Marsh@grecbiomass.com Tommy Gardner, Maintenance Supervisor (386) 315-8012 Tommy.Gardner@grecbiomass.com

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1. SUMMARY OF INSPECTION ACTIVITY

This report documents the property loss prevention survey conducted on June 24, 2015 at the Gainesville Renewable Energy Center (GREC) in the City of Gainesville, Alachua County, Florida.

The purpose of this visit was to evaluate the present risk exposures for the All Risk Property Insurance Program. A tour of the facility was conducted and conversations were held with senior plant management.

The loss prevention evaluation consisted of a discussion and visual evaluation of the present overall occupancy, inspection of facility fire safety equipment and review of human element programs.

2. LOCATION OVERVIEW

This is a new Plant, located within the city limits of Gainesville in Alachua County, Florida. The site consists of 130 acres of which approximately 60 acres contain the power plant and fuel handling and storage operations.

The GREC Plant is designed to operate as a dispatched base-load plant. The major pieces of equipment consist of:

- One Metso Hybex BFB wood-biomass burning boiler, rated at 930,000 pph, 1620 psi @ 1005°F with a natural gas fired light-off system.
- One Siemens Steam Turbine with a Brush Generator (STG set) with a rated capacity of 116.1 MW at 13.8 KV.
- Fuel processing equipment (mills, conveyors, etc.).
- Ash handling equipment.
- Balance of Plant (BOP) equipment.

Date of Commercial Operation was December 17, 2013. It is owned by GREC Partners, and operated and maintained by North American Energy Services (NAES) Inc. This is a zero discharge Power Plant.

3. LOSS PREVENTION DISCUSSION

The plant is new, as stated above commercial operations began on December 17, 2013. At the time of the survey, the Plant's generating and balance of plant equipment was operating. The plant had an average net power output of 76 MW in 2014.

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The facility is a dispatchable unit and operates with Automatic Generation Control (AGC). The operating load is between 70 MW (minimum dispatch load) and the unit's maximum (permitted) net capacity is 102.5 MW. The plant has a parasitic load need of 10 to 12 MW to operate. It can generate from cold start-up in 16 hours. It does not have black start capabilities. The facility has a Power Purchase Agreement (PPA) with the Gainesville Regional Utilities (GRU). The agreement is for a nominal 100 MW net for a term of 30 years. The facility is connected to GRU's 138 kV transmission system.

The Plant is licensed to use:

- Locally available wood products from sources certified to meet forest sustainability standards. These include green sawdust and tree bark from tree processing mills, paper mills, etc.
- Urban Biomass: Tree trimmings, etc. primarily from private urban based gardens
- Other clean wood waste such as old pallets that have been turn to wood chips.

The plant currently has contracted with 12-14 fuel suppliers, to supply their fuel needs. All are within a 70-mile radius from the plant.

Plant structures were designed to withstand hurricane force winds. Buildings and structures are concrete block, poured concrete and steel.

There is a capital investment planned to build an oil storage area for new and used oil. The storage area will be outside away from other structures and will be a three (3) sided shed with a roof and with spill containment and drainage to an oil-water separator.

3.1 CONCLUSION

The GREC is a newer power plant designed and built to good engineering and industry practices. The plant is new and still under warranty when surveyed. The operators, supervisors and managers are experienced and knowledgeable. The plant rates Very Good for insurance purposes.

4. RECOMMENDATIONS

4.1 NEW RECOMMENDATIONS

There are no new recommendations resulting from this survey visit.

4.2 PRIOR RECOMMENDATIONS

All prior recommendations have been completed. See below.

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4.3 COMPLETED RECOMMENDATIONS

P20140501 Upgrade the Fire Protection Equipment Self-Inspection Program

An outside contractor is currently conducting inspections, testing, and maintenance of the water based fire protection systems per the NFPA quarterly and annual guidelines. These visits should be supplemented by weekly non-flow test runs of the two fire pumps and monthly visual inspections of all fire protection control valves to ensure they are locked in the open position.

Comment: Plant personnel are now doing weekly runs of the fire pumps and a contractor is doing the monthly visual inspections of the fire systems. Recommendation is considered completed.

P20140502 Develop a Hurricane Preparedness Plan

The plant's Safety Manual does not address hurricane preparation and response. Without, a detailed program in place, significant damage can be expected to the facility.

A detailed hurricane preparedness plan needs to be developed, since the plant is located in a hurricane prone area. This facility is in a 100 mph (3-second peak gust) wind prone area per ASCE 7-05.

Comment: A hurricane preparedness and response procedure has been written. Recommendation is considered completed.

P20140503 Impairment Handling Program

A system identifying impairments to fire protection systems, including the automatic sprinkler system is not in place. An impairment handling system will provide extra protection when fire protection systems for the building are placed out of service for repairs or other needs.

Implement a written fire protection equipment impairment handling program to supervise all impairments to water supplies, sprinkler systems, and alarm systems that includes the use of an impairment lockout tag and all applicable precautions, notification of the impairment to a representative of the property insurance company. Contact AIG via our Impairment number, 1-877-705-7287 or email, GlobalProperty.Impairment@aig.com, the fire alarm company, and fire department, plus fire watches, and follow up at the close of the impairment should be put into effect. A copy of the AIG fire protection equipment impairment program was sent to the facility.

Comment: The plant is using AIG's Impairment Handling program. Recommendation is considered completed.



P2014-05-04 Upgrade the Facility's Safety Manual

The plant's Safety Manual is based on NAES's corporate safety manual. The plant's safety manual should be updated to include site-specific information such as specific contact persons' names, contact information, and site-specific building information etc.

Comment: Safety manual has been updated with site-specific information. Recommendation is considered completed.

P2014-05-05 Invite Local Fire Department to Tour

An important part of overall fire safety at a facility is in the familiarity of the local fire department with the facility. Therefore, it is recommended that the local responding fire department(s) be invited to tour your facility in order for them to familiarize themselves with the layout and operations of the plant. This can greatly reduce the amount of damage to your plant if a fire would occur. Members of the local fire departments should be invited back on an annual basis.

Comment: The local fire department has toured the facility and done drills on site. Recommendation is considered completed.

P2014-05-06 Install Spray Shields/Guards on All Lubricating and Seal Oil Flanges

The shields should be US Navy listed or custom flange guards can be fabricated to prevent oil spray during a flange leak.

Lubricating and seal oils have relatively high flash point and therefore are generally not easily ignited. However, a leak of high pressure oil from a flange or other fitting will cause oil to atomize. Atomized oil can be easily ignited from a hot surface and the ensuing fire damage from the spray fire would be severe. The provision of spray shields will be considered.

Comments: Spray shields have been installed on the lube oil flanges of the steam turbine generator. Recommendation is considered completed.

5. HISTORY & OWNERSHIP

Date of Commercial Operation was December 17, 2013. It is owned by GREC Partners, and operated and maintained by North American Energy Services (NAES) Inc. The General Contractor was Fagen Inc., and the engineering firm was Zachry Engineering.



6. PLANT LAYOUT & EXPOSURES

6.1 SITE DESCRIPTION

This is a new single unit biomass power plant (116Mw gross), located on approximately 130 acres adjacent to the Gainesville Regional Utilities coal fired power plant. The site is level with open undeveloped land surrounding it.

6.1.1 Location

The plant is located on approximately 130 acres within the city limits of Gainesville in Alachua County, Florida.

Latitude: 29.7676 x Longitude: -82.3962

Elevation: 186 ft. amsl

6.2 EXPOSURES

6.2.1 Surrounding Exposures

North: Open land

South: Open land, GRU power plant to the SE > 1000+ ft.

East: Pond

West: Wood yard

6.2.2 Natural Perils

Earthquake

The earthquake exposure is considered Low. The facility is in an area categorized by Munich RE as Zone 0: (MM V or below) on a scale of 0 to 4. This is the Probable maximum intensity (MM: modified Mercalli scale) with an exceedance probability of 10% in 50 years (equivalent to a “return period” of 475 years) for medium subsoil conditions.

Flood or Tsunami

This facility is located in a Flood Zone X (Unshaded), placing the plant outside the 500-year flood elevation. There is no storm surge exposure. All structures are above the surrounding grade elevation and would not be subject to flood exposures. Flood zone location has been determined from FEMA Alachua County/City of Gainesville Flood Map 125107C0145D, dated 06/16/2006 and storm surge from Munich Re NATHAN (See appendix).



Windstorm

The facility is located in an area of Florida categorized by Munich RE as Zone 3 (213 - 251 km/h (132 - 156 mph) peak wind speeds) for tropical cyclones on a scale of 0 to 5. This is the Probable maximum intensity with an exceedance probability of 10% in 10 years (equivalent to a “return period” of 100 years). This facility is in a 100 mph (peak gust) wind prone area per ASCE 7-05. The structures and buildings appear secured but damage can be expected during a severe hurricane. Metal buildings, equipment, and insulation would be expected to receive damage during the windstorm.

Tornado

The plant is in an area categorized by Munich RE as Zone 4 for tornadoes on a scale of 1 to 4 (Frequency and intensity of tornados), a high frequency and intensity of tornadoes.

Lightning

Lightning poses a significant exposure in this region of the country. The plant is in an area categorized by Munich RE as Zone 5 for lightning on a scale of 1 to 6. Zone 5 represents a frequency of 20 – 40 lightning strokes per km² per year whether the strikes reach the ground or not. Ground charge dissipaters cover all main structures. Suitable grounding and bonding of key electrical components is provided.

Severe Weather

This facility is located above/north of the freeze line. However, damage from severe cold or snow loading is not a major concern.

Hail is a moderate exposure in this region of the country. The plant is in an area categorized by Munich RE as Zone 3 for hail on a scale of 1 to 6.

Other

Sinkholes are always possible in this region of Florida. There has been no recent sinkhole activity reported in the immediate area.

6.3 LAYOUT & CONSTRUCTION

6.3.1 Building & Plant Layout

This is an outdoor-type power station. The boiler structure’s floor levels are of open steel-grate construction without enclosing walls. The steam turbine generator is within a metal panel enclosure



located at the north end of the boiler structure. The overall layout of this plant is very good. There is good space separation between buildings and equipment and the wood yard.

6.3.2 Construction

Building Name	Year Built	Height (ft.)	Total Area (ft ²)	Construction			# Fire Areas	AS	Condition
				Walls	Roof	Floor			
Admin/Control	2013	18	5000	LNC	LNC	Concrete	1	Y	New
Maint./Whse	2013	24	6250	LNC	LNC	Concrete	1	Y	New
Water Treatment	2013	24	2000	LNC	LNC	Concrete	1	Y	New
Hogger/Screen House	2013	40	3300	LNC	LNC	Concrete	1	Y	New

7. MAJOR EQUIPMENT

7.1 STEAM GENERATORS

7.1.1 General Information

STEAM GENERATORS									
Unit	Size (pph)	Type	Mfg.	Year	Fuel 1	Fuel 2	MAWP	Temp (°F)	Asbestos
1	930,000	BFB	Metso	2013	Biomass	N.G.	1945	1005	No

The boiler is a Metso (now Valmet) Hybex wood-fired bubbling fluidized bed (BFB) boiler.

The average burn rate is ~130 tph @ 42% moisture.

Burn Rate at 70 Mw is ~2100 tpd.

Burn Rate at 102 MW(net max load) is ~3,000 tpd.

FEEDWATER						
Unit	Boiler Feed Pumps			Water Chemistry		
	Type	No.	Fixed Protection	Online	Grab	Dosing
1	Elec.	2	Yes	Yes	Yes	-

Each pump is rated for 100% of the boiler's needs.

7.1.2 Fixed Protection Overview

STEAM GENERATORS						
Unit	Burners			Stack		
	No. /Levels/ Pattern	Controls / Trips	Protection	Height	Construction	Lining
1	4 & 6/ 2 / front & back	Complete	N/A	230'	Steel	-

The boiler has automatic natural gas fired igniters(4) for light off only with a completed set of combustion controls. There are six wood feeders (3 on front and 3 on back).

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BOILER AUXILIARIES							
Unit	Bag House			Precipitator		Air Preheater	
	Temp Rating	Temp Monitor	Protection	O ₂ Monitor	Protection	Type	Protection
1	500	Yes	No				

Includes two baghouses (only one is needed) with 10 compartments each using Teflon bags rated for 500°F. The baghouses are monitored for ΔP and temperature. Normal inlet temperature is 445°F with alarms well below the 500°F level. There is also a Selective Catalyst Reduction (SCR), which uses 19.5% aqueous ammonia.

All ash is trucked to a landfill.

7.2 PRIME MOVERS & GENERATORS

7.2.1 General Information

STEAM TURBINES								
Unit	Rating (MW)	Mfg.	Year	Model	Serial	Cases/Flows	Service	TDP-1
1	116.1	Siemens	2013	SST900	-	3	base	-

GENERATORS								
Unit	Rating (kVA)	Mfg.	Year	Model	Serial	Volts (kV)	Cooling	Ring Mat'l
1		Brush	2013	-	971007010	13.8	H2O	-

The STG is a water-cooled unit. No hydrogen used or on site. The unit is located at the north end of the boiler structure within an elevated metal panel enclosure.

7.2.3 Fixed Protection Overview

STEAM & COMBUSTION TURBINES							
Units	Under deck	Lube Oil Unit	Lube Oil Piping	Seal Oil	Bearings	Exciter	Enclosure
1	AS	AS	AS	AS	AS	-	-

7.3 TRANSFORMERS & ELECTRICAL SYSTEMS

7.3.1 Transformers

MAIN TRANSFORMERS								
Unit	Rating (MVA)	Mfg.	Year	Serial	Volts (kV)	Form	Phases	Oil Capacity
GSU	104/139/173	Penn	2012	C-07987-5-1	13.8/138	Core	3	13,250
SS	18/24	Penn	2012	C-07992-5-1	13.8/4.16	Core	3	5,990

PROTECTION					
Unit	Separation		Protection		
	Transformers	Buildings	Fixed	Barrier Walls	Containment
GSU	Adq.	Adq.	AS	Yes	Yes
SS	Adq.	Adq.	AS	Yes	Yes

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The GSU has an on-line gas monitoring system (Calisto). In addition, oil sampling is done yearly.

The plant is not black start capable. However, there is an alternate electric feed (@13.8KV) with manual switchover should they loss the primary feed to the plant.

7.3.2 Cable Spreading Rooms

CABLE SPREADING						
Unit	Location	Size	No. Trays	Detection	Protection	Penetrations
1	Perimeter of boiler	-	varies	-	AS	Sealed

7.4 CONTROL ROOMS & CONTROL SYSTEMS

CONTROL ROOMS							
Unit	Location	System Type	Size	Detection	Protection	Penetrations	Staffing
1	Admin Bldg.	DCS	1500	Smoke	AS	Sealed	Cont.

7.5 FUEL STORAGE & HANDLING

7.5.1 Solid Fuel Handing, Preparation & Storage

The biomass (wood) is received by truck from various suppliers within the local area (within 70-mile radius). Wood is received Monday – Friday and occasionally on Saturday from 7:00 am – 8:00 pm. The plant averages 100-110 trucks per day (trucks avg. 23 tons of fuel each). The trucks are unloaded by hydraulic dumpers(3). Underground conveyor (belt #1) takes the wood from the unloading bins to the screen house/chipper where it is sized then conveyed to one of two wood piles via stack-out conveyors. The fuel handling equipment has magnets in several locations to remove any iron, or metal objects. The piles have two reclaimers (1 – under pile and a drag chain reclaimer). Frontend loaders are used to maintain the piles and push the wood fuel to the under pile reclaimer openings.

The plant’s target is to maintain 20-22 days worth of fuel on site.

There is a contract with Bio Resource Management, Inc. (BRM) to manage fuel procurement and ensure forest sustainability standards are met. BRM is a locally based consulting firm that specializes in biomass supply services BMR Inc.

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CONVEYORS & TRANSFER HOUSES						
Location	Length	Enclosure	Protection	Detection	Trips/Alarms	Tramp Metal
1 Truck Dumper to Hogger	270'	Underground	AS	-	Yes	Yes
2 Hogger to belt 4	80'	Covered	AS	-	Yes	-
3 Hogger to belt 4	80'	"	AS	-	Yes	-
4 transfer to belts 5,6,8	270'	"	-	-	Yes	-
5 to stacker	183'	"	-	-	Yes	-
6 to stock-out	101'	"	-	-	Yes	-
7 to reclaim	185'	-	-	-	Yes	-
8 from hogger/stacker to belt 9	180'	Covered	-	-	Yes	-
9 Main feed to plant	285'	"	AS	-	Yes	Yes
10 to surge bins	32'	-	-	-	Yes	-
11 from stock-out reclaim to belt 9	108'	Covered	-	-	Yes	-
Stacker	61	-	-	-	Yes	-

The main boiler feed belt (#9) has 2-separate drive systems and the plant has a spare belt on site.

BUNKERS & PULVERIZERS								
Unit	Bunkers		Crushers/Chippers			Pulverizers		
	Protection	Detection	Type	No.	Protection	Type	No.	Protection
1	-	-	Chippers	2	AS	-	-	-

There are two 50% hoppers(chippers) for sizing any wood coming in that might be considered oversized. Wood chips will go through a screening process and any oversized pieces will be directed to the chippers.

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There are two silos/bunkers/surge bins located at the boiler, which if full could provide about 45 minutes of fuel to the boiler should the feed belt go down.

7.5.2 Fuel Storage Tanks

None, except diesel fuel oil tank for emergency generator.

7.6 ANCILLARY EQUIPMENT & SYSTEMS – BALANCE OF PLANT

Condensing and Cooling Systems

COOLING TOWERS							
Unit	Type	Construction	Fill	Cells	Cell Barriers	Protection	Fan Interlock
1	Counterflow	FRP	PVC	5	Yes	No	No

Hydrogen

No hydrogen on site. Not used to cool the STG.

Ammonia

There is one approximately 10,000 gallons tank that stores aqueous ammonia (19.5%) used for NOx reduction.

Water Supplies

From two – full capacity well pumps plus one- potable water well and a reclaim water pipeline from the City of Alachua. Plant design was for 1.2 million GPD.

Process Water

Obtained from the reclaim pipeline and the on-site wells. The Plant produces its own boiler feed water using a house facility that uses RO and electric ionic removal equipment. Demineralized water is stored in a steel tank.

Waste & Effluent Handling

The plant is a Zero Discharge facility. Wastewater (primarily from ash handling) is evaporated using a fallen film evaporator that uses a 700 HP compressor to pressurize waste steam. The resultant solids are compressed and land filled.

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Compressed Air

125 HP Atlas/Copco units. Air compressors with redundancy with adequate supply for both service water and instrument air. Service air was reported to be dried and filtered.

Emergency Power

The plant has a 750 KW diesel engine generator to provide emergency power to critical equipment for safe shut down. The unit is self-contained (has its own fuel tank) and is in an enclosure northeast of the boiler. The enclosure has a fire detection system. Full load testing of the unit using a load bank is done every summer.

Warehousing and Storage Areas

WAREHOUSING / STORAGE							
Location	Commodity/ NFPA Class	Storage Height (ft.)	Clearance	Aisle Width (ft.)	Rack Storage		
					Type	Depth	# Tiers
Admin Bldg.	2 – 3	12-15	5'	8	S/DDR	4	3

8. FIRE PROTECTION

8.1 FIRE BRIGADE / FIRE DEPARTMENT

FIRE BRIGADE / FIRE DEPARTMENT						
Organization	Type	ISO Class	Distance	Response Time	Obstructions	Formal Pre-plan
Gainesville FD	FT – paid	-	~3 miles	10 min	RR	TBD

8.2 FIRE WATER SUPPLY & FIRE PUMPS

FIRE WATER SUPPLIES				
Source	Size/ Capacity	Yard Main Size	No. Available Hydrants (Public & Private)	Adequacy/ Reliability
Service H2O Tank	1 mil / 250K+ reserved	12"	22	Adequate & Reliable

FIRE PUMPS				
Type (driver)	Rated GPM	Rated PSI	Auto/ Manual	Suction Source
Electric	2000	152	Auto.	Service H2O Tank
Diesel	2000	152	Auto.	Service H2O Tank

The fire pumps were flow tested on April 1, 2015 and the results were Satisfactory.



8.3 MANUAL FIRE FIGHTING SYSTEMS

Portable fire extinguishers are located throughout the facility and there are nine monitor nozzles located on fire hydrants. The boiler structure has a dry standpipe with hose stations.

8.4 FIXED FIRE PROTECTION SYSTEMS

8.4.1 Sprinkler Systems

SPRINKLER PROTECTION						
Location	Type	Design Density	Required Density	Existing Demand		Adequacy
				GPM	PSI	
Admin/Control Bldg.	Wet	0.25/1502	0.10/1500	593	94	Adq.
Maint/Whse	Wet	0.25/1950	0.20/1950	828	101	Adq.
STG Bearings	Dry	0.25/E.A.	0.25/E.A.	546	70	Adq.
STG Underdeck	Dry	0.3/E.A.	0.3/5000	1282	115	Adq.
STG Lube Oil	Deluge	0.3/E.A.	0.30/E.A.	830	118	Adq.
Boiler Feed Pump	Dry	0.30/E.A.	0.30/E.A.	563	66	Adq.
GSU Transformer	Deluge	0.25/E.A.	0.25/E.A.	1439	121	Adq.
SS Transformer	Deluge	0.25/E.A.	0.25/E.A.	1025	135	Adq.
Fire Pump house	Wet	0.25/E.A.	0.25/E.A.	-	-	Adq.
Water Treatment Bldg.	Wet	0.25/1585	0.15/2000	958	84	Adq.
Fuel Unloading – Hyd.	Dry	0.50/E.A.	0.30/E.A.	617	27	Adq.
Fuel Unldg – Below grade conveyor	Dry	0.30/100' linear	0.30/EA	1196	92	Adq.
Screen/Hogger House	Dry	0.30/3277	0.30/E.A.	1926	98	Adq.
Scale House	Wet	0.10/1288	0.10/1500	581	70	Adq.

8.4.2 Gaseous & Clean Agent Systems

GASEOUS EXTINGUISHING SYSTEMS			
Location	Type	Density or Design	Adequacy
None			

8.5 FIRE & GAS DETECTION SYSTEMS

FIRE & GAS DETECTION SYSTEMS		
Location	Type	Adequacy
PDC/MCC & Elec Rooms	Smoke	Adequate
Emerg. Generator Encl	Smoke	Adequate
CEM Shed	Smoke	Adequate
Battery Rooms	Smoke & H2	Adequate
Admin/Control Bldg.	Smoke	Adequate

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ALARM & /MONITORING SYSTEMS				
Alarm System Type	Alarms Supervised	Alarm Location	Test Frequency	Adequacy
Proprietary	Yes	Control Room	Annually	Adq.

8.6 FIRE PROTECTION SYSTEM MAINTENANCE & TESTING

The plant has contracted with W. W. Gay fire & Integrated Systems, Inc. to perform the inspections and testing of the fire safety equipment per NFPA Standards.

Plant needs to perform weekly runs of the fire pumps and the monthly visual inspections, see recommendation.

9. MANAGEMENT PROGRAMS

9.1 GENERAL ORGANIZATION

The owners have contracted with NAES to act as the O&M contractor.

The Plant (NAES) employs 41 persons. There are 30 persons assigned to four shift groups following a modified DuPont schedule. There are also 5 BRM employees, 2 EMI employees, and 1 Valmet employee on site.

9.2 OPERATIONS

9.2.1 Organization, Qualifications & Experience

NAES has set up an organization and staffing structure that is standard in the power generation industry. All key Plant personnel have extensive power plant experience.

9.2.2 Operator Training

Plant personnel were trained by the OEM of the various plant equipment. Personnel were reported to have come from similar power plants and have extensive experience.

9.2.3 Operational Procedures & Routines

Operation procedures were reported to cover most Plant operations and maintenance work. There is a library with the equipment information.

9.2.4 Permit To Work

Work permits are generated for maintenance tasks. Hot work permits are used where required. There is a Lock-Out/Tag-Out procedure, and Confined Space procedure.

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9.3 MAINTENANCE, INSPECTION & TESTING

9.3.1 Organization, Qualifications & Experience

The Plant uses a CMMS (MP2). Maintenance personnel are experienced. Maintenance personnel are qualified by education, training and experience.

9.3.2 Contractors & Contractor Screening

NAES has a procurement and screening process, which evaluates a contractor's capacity to complete a task on time, safely and efficiently. Contractors are chosen by the Plant using NAES guidelines.

9.4 RISK & SAFETY MANAGEMENT

9.4.1 Organization & Safety Programs

NAES has safety programs that comply with all regulating agencies requirements and industry's best practices.

9.4.2 Safety Awareness & Auditing

The Plant has established audit frequencies of monthly in-house and NEAS corporate does annual audits. In addition, the owners tour plant regularly and perform safety audits. All personnel are responsible for safety.

9.4.3 Management of Change

There is a formal procedure for both engineering and operational changes. All changes are reviewed by appropriate personnel (NAES & Owners) and signed off by the plant manager.

9.4.4 Control of Ignition Sources

Plant follows NAES's Safety Manual, which covers Hot Work Permitting and also covers smoking, which is limited to designated areas.

9.4.5 Fire System Impairment Handling

The plant is using AIG's program.



9.4.6 Emergency Planning and Organization

The plant has adopted NAES’s Safety Manual.

9.4.7 Environmental Issues and Operational Permits

The plant is permitted to generate a maximum of 102.5 MW net, and has to abide by air permit requirements. The Plant is a Zero discharge facility.

9.4.8 Housekeeping

Housekeeping was found to be excellent throughout the facility including around and below the conveyor belts.

9.4.9 Security & Surveillance

There are no on-site security personnel at this facility but passive protection is considered acceptable as the plant is continuously manned. The Plant perimeter is enclosed by a 6-foot chain link fence with barbed wire above and cameras are strategically located at key areas.

The Plant uses CCTV for security and for monitoring plant processes. CCTV cameras are located throughout the Plant, and the CCTV Monitors are located in the Control Room. Communications is via plant wide PA, portable radio and/or cell phone.

10. LOSS HISTORY

LOSS HISTORY				
Date	Incident	Gross Claim	Final Settlement (Net of deductible)	Changes/Precautions
None	Reported	-	-	-

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11. LOSS ESTIMATES

11.1 PROPERTY LOSS ESTIMATES

Worst Case Property Loss Estimates			
Event	USD million	BI Time Element	Equipment Affected & Possible Event(s)
PML	64.7	10 months	Steam Turbine + Generator; 116MW Capacity. Major fire in lube system resulting in casing, bearing, rotor, valve and piping damage
PD	14.6		
BI	50.1		
EML	253.1	30 months	CFB - Sub-critical Circulating Fluidized Bed Boiler; 930000 lbs/hr steam Capacity. Loss of flame with re-ignition, resulting in furnace explosion. Furnace protection systems inoperative.
PD	103.1		
BI	150.0		

Notes on estimates: PD and BI figures are without regard to deductibles or waiting periods

BI Notes: BI calculated from average fixed mthly/annual revenue. Recovery periods are without regard to the availability of spare equipment. Any contractual or independent system operator penalties were not considered.

11.2 INSURED VALUES

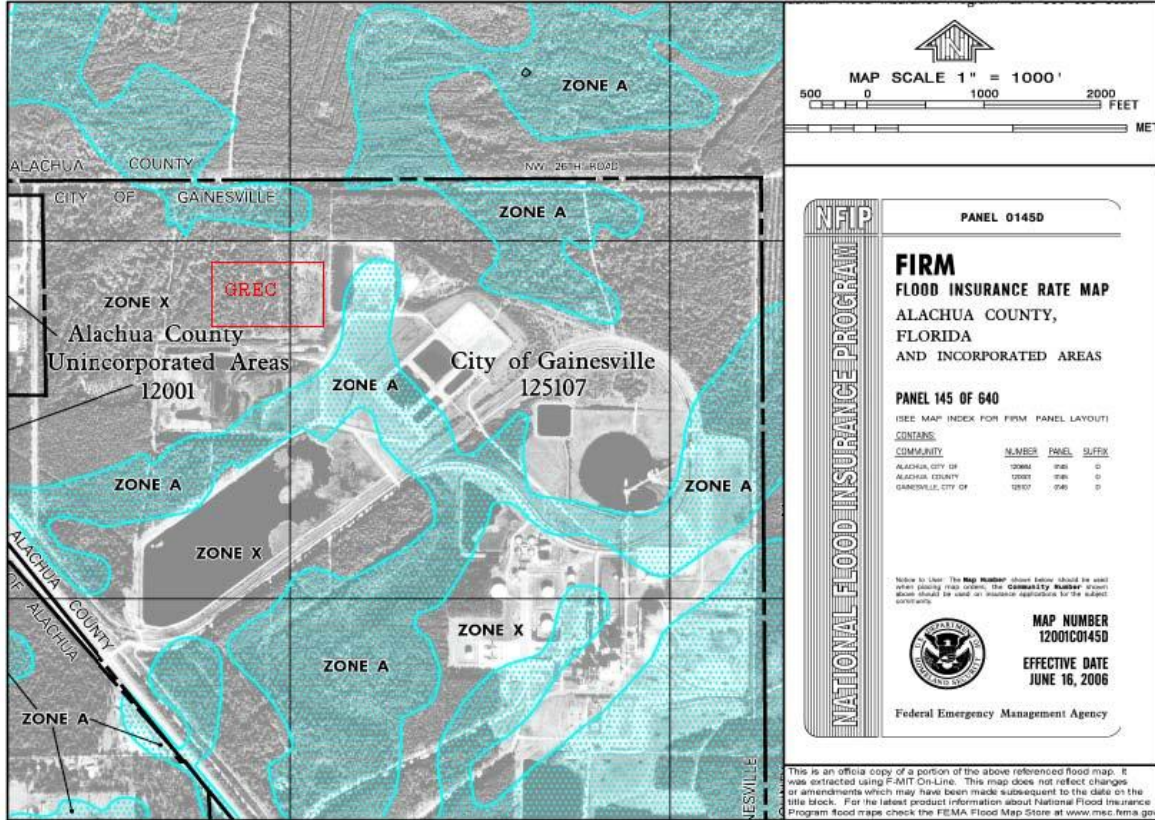
TOTAL INSURABLE VALUES:			
PD		TIME ELEMENT	
Buildings	\$ 8,998,603	BI	\$ 90,185,000
M & E	\$ 280,396,236	EE	
Contents	\$ 2,511,000	Rents	
Stock	\$ 4,000,000		
Tanks			
Other			
TOTAL	\$ 295,907,236	TOTAL	\$90,185,000

Note: The reported BI value is for a period of 18 months.

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12. APPENDIX



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NATHAN Single Risk Assessment Report

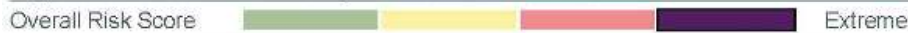
Risk Location	USA (United States)
Longitude/Latitude	-82.3962E, 29.7676N
Munich Re Risk Location Quality	Exact Coordinates (100)
People per km²	10 – 49
Elevation	67m
CRESTA Zone High Res	USA_32653 (Gainesville)
CRESTA Zone Low Res	USA_FL (Florida)



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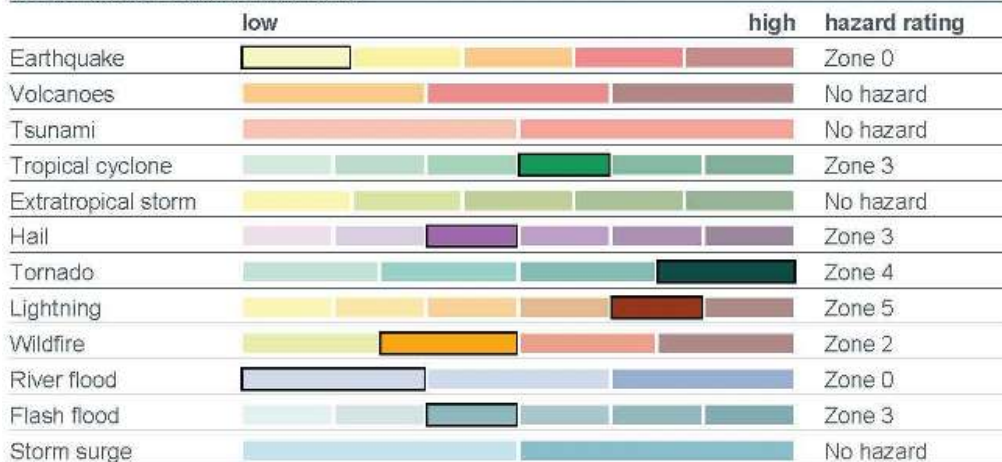
Risk Score Rating

Weighted and summarized Risk value for ordinary commercial and industrial business



Hazard Score Rating

Hazard zoning values for significant natural hazards



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Legends

Earthquake

- Zone 0: MM V and below
- Zone 1: MM VI
- Zone 2: MM VII
- Zone 3: MM VIII
- Zone 4: MM IX and above

Probable maximum intensity (MM: modified Mercalli scale) with an exceedance probability of 10% in 50 years (equivalent to a „return period“ of 475 years) for medium subsoil conditions.

Tropical cyclone

Peak wind speeds

- No hazard: < 76 km/h
- Zone 0: 76 – 141 km/h
- Zone 1: 142 – 184 km/h
- Zone 2: 185 – 212 km/h
- Zone 3: 213 – 251 km/h
- Zone 4: 252 – 299 km/h
- Zone 5: ≥ 300 km/h

Typical track directions

Probable maximum intensity with an exceedance probability of 10% in ten years (equivalent to „return period“ of 100 years).

Tornado

- Zone 1: low
- Zone 2
- Zone 3
- Zone 4: high

Frequency and intensity of tornados.

River flood

- Zone 0 minimal flood risk
- Zone 500 year return period
- Zone 100 year return period

Areas threatened by extreme floods. NATHAN provides global flood maps with return periods of 100 and 500 years.

Volcanoes

- No hazard*
- Zone 1: Minor hazard
- Zone 2: Moderate hazard
- Zone 3: High hazard

*Secondary effects that can occur as a result of the large-scale distribution of volcanic particles (e.g. climate impacts, supraregional ash deposits) are not considered

Extratropical storm

Peak wind speeds

- No hazard
- Zone 0: ≤ 80 km/h
- Zone 1: 81 – 120 km/h
- Zone 2: 121 – 160 km/h
- Zone 3: 161 – 200 km/h
- Zone 4: > 200 km/h

Probable maximum intensity with an average exceedance probability of 10% in ten years (equivalent to a „return period“ of 100 years). Areas were examined in which there is a high frequency of extratropical storms (approx. 30°–70° north and south of the equator).

Lightning

Global frequency of lightning strokes per km² and year

- Zone 1: 0,2 – 1
- Zone 2: 1 – 4
- Zone 3: 4 – 10
- Zone 4: 10 – 20
- Zone 5: 20 – 40
- Zone 6: 40 – 80

Lightning frequency is determined by counting the total number of lightning flashes independently of whether they strike the ground or not.

Flash flood

- Zone 1: low
- Zone 2
- Zone 3
- Zone 4
- Zone 5
- Zone 6: high

Frequency and intensity of flash floods.

Tsunami

- No hazard
- Zone 1: Very low to low
- Zone 2: Medium to high

Detailed calculations for coasts and for the shores of large lakes between 60°S and 60°N, derived from the height above the mean sea or lake level and the distance from the respective body of water. Does not consider dykes.

Hail

- Zone 1: low
- Zone 2
- Zone 3
- Zone 4
- Zone 5
- Zone 6: high

Frequency and intensity of hailstorms.

Wildfire

- No hazard
- Zone 1: low
- Zone 2
- Zone 3
- Zone 4: high

The effects of wind, arson and fire-prevention measures are not considered.

Storm surge

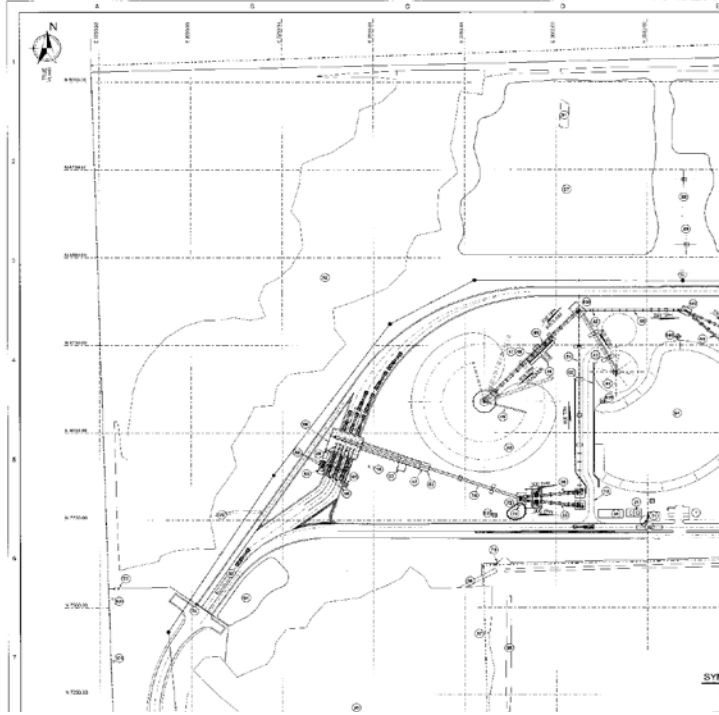
- No hazard
- Zone 1: Very low to low
- Zone 2: Medium to high

Detailed calculation for coasts and the shores of large lakes between 60°S and 60°N, derived from the height above the mean sea or lake level and the distance from the respective body of water. Does not consider dykes.

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NFPA – 850/851 Checklist

NFPA - 850/851 CHECKLIST			
Equipment	Passive Protection	Fire Detection	Fire Protection
Steam Turbine Generator Bearings	None	Heat	AS
Steam Turbine Lubricating Oil Tank	Metal enclosure	Heat	AS
Steam Turbine Control Oil Skid	Metal enclosure	Heat	AS
Steam Turbine Lubricating Oil Piping	Welded	-	AS
Steam Turbine Under deck Area	-	-	AS
Generator Seal Oil Unit	Metal Enclosure	Heat	AS
Steam Turbine Generator	Metal Enclosure	Heat	AS - Brgs
Boiler Burner Front	Comb Controls	-	-
Generator Transformer(s)	Walls	Heat	AS
Auxiliary Transformer(s)	Walls	Heat	AS
Cooling Tower(s) / Air Cooled Condenser(s)	N/A	N/A	-
Control Room	Subdivision	Smoke	AS
Control Room below raised floors	N/A	N/A	N/A
Water Treatment Electrical Room	Subdivision	Smoke	AS
HV and LV Switch Rooms	Subdivision	Smoke	N/A
Cable Spread Areas	-	-	-
DCS Control/Relay Rooms	Subdivision	Smoke	AS
Local Control Centers/Essential Supplies Cubicles	Subdivision	Smoke	N/A
Stores and Workshop	Separation	N/A	AS
Administrative Buildings, Canteen and Offices	Subdivision	Smoke	AS
Emergency Diesel Generator/s	Separation	Smoke	-
Diesel Fire Pump/s	Subdivision	-	AS
Conveyors	Interlocks	Partial	AS – some
Conveyor Transfer Towers	Interlocks	-	AS
Tripper Bay	Interlocks	-	-
Bunkers	Interlocks	-	-
Mills	Interlocks	-	AS

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