



Florida Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

November 14, 2008

Mr. Jackie Pons, Superintendent
Leon County School District
2757 West Pensacola Street
Tallahassee, Florida 32304

Dear Superintendent Pons:

Thank you for your November 13, 2008, letter to the Florida Department of Environmental Protection (Department) regarding the draft air construction permit for the proposed Biomass Gas & Electric facility. I would like to take this opportunity to address the questions you have raised regarding this proposed facility.

1. Please list the approved fuel sources that will be used at the plant.

The approved fuels will consist of clean woody biomass. In addition, natural gas may be used for the start-up burner and the auxiliary boiler.

2. In regards to the fuel source, what process will be in place to insure only approved fuels are used in the gasification process?

The draft air permit requires extensive record keeping and reporting for the fuel used at the facility. In addition, the draft permit requires the applicant to inspect the fuel deliveries to verify the fuel meets permit requirements. These requirements are set forth in detail in Appendix E of the draft permit. The Department is responsible for inspecting the facility and reviewing these records and reports to ensure compliance with the permit.

3. What process is in place to insure that there are no accompanying toxic materials in the sawdust, especially in materials from out of state?

The draft air permit limits the fuel to clean woody biomass and explicitly excludes painted or treated wood. The permit also requires extensive record keeping and reporting for the fuel used at the facility. In addition, the applicant is required to inspect the fuel deliveries to verify the fuel meets permit requirements. These requirements are set forth in detail in Appendix E of the draft permit. The Department is responsible for inspecting the facility and reviewing these records and reports to ensure compliance with the permit. There is not a prohibition on materials from out of state; but they must meet permit requirements.

4. What safeguards are in place to prohibit the use of municipal solid waste at the plant?

The draft air permit requires extensive record keeping and reporting for the fuel used at the facility. The draft permit also requires the applicant to inspect the fuel deliveries to verify the fuel meets permit requirements. These requirements are set forth in detail in Appendix E of the draft permit. Permit conditions Section 3.A.6. and Section 3.B.6 state:

Municipal Solid Waste (MSW) is prohibited from use at this facility. The fuel shall consist of woody biomass as described in Appendix-E - Woody Biomass Feedstock Properties and Control Plan of this permit. Inspection and testing procedures describe in Appendix-E shall be followed to insure that appropriate woody biomass is used as fuel and that MSW is not used as fuel.

Fuel: Other than the natural gas for the start-up burner, only woody biomass as described in Appendix - E Woody Biomass Feedstock Properties and Control Plan, shall be used as fuel. Municipal Solid Waste is prohibited from use at this facility.

The Department is responsible for inspecting the facility and reviewing these records and reports to ensure compliance with the permit.

5. What process insures that no harmful gases escape in excess of the amount permitted by Florida Law?

The draft permit establishes enforceable emission limits for air pollutants. Emissions of these pollutants are either monitored by continuous emissions monitors or testing is required to confirm compliance with the emission limits as set forth in more detail in the draft permit and technical evaluation (enclosed). These test results and monitoring data must be submitted to, and will be reviewed by, the Department to ensure compliance with the permit conditions.

6. Are objectionable odors from the stockpile of fuel, or the gasification process expected, if so what would be the expected extent or range?

Objectionable odors are prohibited by Section 2, condition 10 and Section 3,A. condition 5 which state:

Objectionable Odors Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]
{Note: An objectionable odor is defined in Rule 62-210.200(Definitions), F.A.C., as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.}

Objectionable Odor: The permittee shall handle, store and dry the biomass so as not to cause, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

7. What are the potential dangers of the supposed "inert" residue that results from the process? What will be the method of disposal for this residue?

November 14, 2008

The Department is not aware of any potential dangers and does not anticipate an issue with "inert" residue because the source material is limited to clean woody biomass. The char is reused in the char combustor and the ash material will be disposed of off-site in accordance with Department rules.

8. What is the expected truck traffic increase in the area, as it pertains to school start and school bus pickup and drop off in the vicinity?

The draft permit requires the clean woody biomass be conveyed to the facility by the active rail system adjacent to the property. It is anticipated that approximately every seven to 10 days a 100 railcar-long train will deliver clean woody biomass to the facility.

For your convenience, I have enclosed a copy of the Department's technical evaluation of the proposed project. If you have any additional questions or would like to discuss this issue further, please contact Joseph Kahn, Director of DEP's Division of Air Resource Management, at (850) 488-0114.

Sincerely,



Mimi A. Drew

Deputy Secretary, Regulatory Programs

Enclosure

cc: Joseph Kahn, Director, Division of Air Resource Management, DEP
S. Glenn Farris, President and CEO, Biomass Gas & Electric, LLC
Ms. Anita Favors-Johnson, City Manager, City of Tallahassee