RECEIVED

JAN 23 2009

AIR PROTECTION BRANCH

SUMMIT ENERGY PARTNERS, LLC

January 21, 2009

James A. Capp
Program Manager
Stationary Source Permitting Program
Georgia Department of Natural Resources
Environmental Protection Division
4244 International Parkway, Suite 120
Atlanta, GA 30354-3906
VIA E-MAIL

Re: PSD Application No. 17700 dated September 27, 2007
Yellow Pine Energy Company, LLC (Yellow Pine)
Fort Gaines, Georgia (Clay County)
AIRS No. 06100001
Sulfur Content in Biomass – Sample Results

Dear Jac,

We received laboratory results for seven samples tested for sulfur and BTU content. The tests show higher sulfur content of 0.020% to 0.03% than indicated in your November 12, 2008 letter (0.01% Sulfur). Please see the test results on the following page. From the test results, the uncontrolled SOx emissions, variance and upper confidence limit were derived. Note that the upper confidence limit matches two of the four pulp mills tested in the NCASI report. Applying the removal efficiencies noted in your November 12, 2008 letter, the indicated SOx limit is 0.014 lb SOx/mmbtu. We request this higher limit.

Discussions with boiler and pollution control manufacturers indicate that a spray absorber using hydrated lime (CaO) and bag house are effective controls for SOx and acid gases when firing on biomass. Accordingly, we request that Yellow Pine be able to use either a dry scrubber using limestone or a spray absorber using CaO, each in combination with a bag house, for SOx and acid gas control.

Sincerely,

On behalf of Yellow Pine Energy Company, LLC

Mark S. Sajer
Managing Director

Yellow Pine Energy Company, LLC - Biomass Test Data

Sample No.	Sample 1	Sample 3	Sample 7	Sample 8	Sample 9	Sample 13	Sample 14
Source	15 yr Pine thin	15 yr Pine thin	Mixed Urban	11yr Pine&Hwd	Mix.Hard wood	Land Clear	10yr Pine&Hwd
Sulfur wt % dry solid	0.02%	0.02%	0.02%	0.03%	0.03%	0.02%	0.02%
HHV dry BTU/lb	7,653	8,100	8,319	8,801	8,388	8,328	8,968
Uncontrolled SOx lb/mmbtu	0.052	0.049	0.048	0.068	0.072	0.048	0.045
% S x lb x 2 lb SOx/lb S / HHV dry x 1 mm = lb SOx / mmbtu							
Mean uncontrolled SOx lb/mmbtu	0.055						
Standard Deviation	0.011	calculation					
99% Confidence Interval on 7 samples	3.14	Table C, t-table, 99% confidence interval, Statistical Methods in Research and Production					
Upper Uncontrolled SOx lb/mmbtu	0.067	mean x std.deviation x t value / square root of 7					
SOx emission @ 79% control, lb/mmbtu	0.014	Upper Uncontrolled SOx x (1 - 79% control efficieny) = controlled SOx					