Georgia Department of Natural Resources
Environmental Protection Division • Air Protection Branch
4244 International Parkway • Suite 120 • Atlanta • Georgia 30354
404/363-7000 • Fax: 404/363-7100
Noel Holcomb, Commissioner
Carol A. Couch, Ph.D., Director

February 15, 2008

Mr. Mark S. Sajer
Managing Director
Summit Energy Partners, LLC
99 Summit Avenue, Suite 2C
Summit, New Jersey 07901

Re: PSD Application No. 17700 dated September 27, 2007
Yellow Pine Energy Company, LLC (Yellow Pine) Fort Gaines, Georgia (Clay County)

Dear Mr. Sajer:

Technical review of the above referenced application for the construction and operation of a 110-megawatt (MW) power plant has begun. As a result, the Division has the following comments:

1. The application indicates that the auxiliary boiler will fire No. 2 fuel oil and propane. However potential to emit (PTE) calculations are provided only for No. 2 fuel. Yellow Pine must estimate emissions for propane combustion as well.

2. Please provide a better description of tripper deck day silos. Be sure that PTE calculations have been estimated. If they have not, please provide this information.

3. What is the capacity of the fuel storage silo?

4. How does Yellow Pine propose to bring control device(s) online after startup and/or shutdown?

5. Yellow Pine proposes to use No.2 fuel oil and/or propane during startup and shut down of the fluidized bed boiler(s). However no PTE calculations were provided for this operation scenario. Please submit vender information and PTE calculations for operating the fluidized bed boiler(s) firing 100 percent No. 2 fuel oil and 100 percent propane. Also provide PTE calculations for firing the worst-case proposed combination of No. 2 fuel oil and propane. Yellow Pine must be sure that these operating scenarios are addressed by the facility's modeling.

6. In what form will the tire-derived fuel (TDF) be fired (i.e. whole, chunked, etc) in the fluidized boiler(s)? Will the TDF be de-wired (i.e. belting removed) upon arrival at the plant? Will Yellow Pine have to conduct any processing of the TDF before firing it in the fluidized boiler(s)? If so, what type of processing will Yellow Pine conduct?

7. Yellow Pine must review and evaluate hybrid and dry cooling towers as Best Achievable Control Technology (BACT) for the cooling tower operation.

8. Yellow Pine, for every pollutant, must rank each BACT by efficiency and provide a cost analysis for each technically feasible control technology eliminated based on cost. The cost analyses shall not include costs associated catalyst disposal or any other solid waste disposal; but shall be adjusted down for tax incentives, etc. For nitrogen oxides (NOx) BACT, Yellow Pine must lists each proposed BACT and rank them by control efficiency. Yellow Pine must provide a cost analysis for each technically feasible NOx control eliminated on cost as discussed above. For example, Yellow Pine must perform a cost analysis for selective catalytic reduction (SCR). In the case of SCR, Yellow Pine may not consider the cost of catalyst disposal in its cost analysis. This may be considered in environmental impacts.

9. What is the engine type (i.e. two-stroke, four-stroke, etc.) for the proposed emergency engine and fire water pump? Are they rich burn or lean burn engines?

10. To date, has Yellow Pine determined if the fire pump stationary engine has a rated speed greater than 2,650 revolutions per minute (RPM)? What is the displacement, in terms of liters per cylinder, for the fire pump and generator engines?

11. Fugitive emissions estimates consistently cite a *Technical Guide to Estimate Fugitive Dust*. However, no such document could be easily located. Please provide a copy of this document for the Division's review.

12. Fugitive emissions estimates indicate batch dumping device capacities citing *Erie Strayer Co*. Please provide an explanation and associated documentation for the values provided.

13. Calculations of biomass fugitive emissions cite emission factors based on source classification codes (SCCs). This tends to indicate that the emission factors were obtained from the Environmental Protection Agency's (EPA's) Factor Information REtrieval (FIRE) Data System. However, no data was given so that this data could be reviewed and verified.

14. How were the quantities chosen for coal, petroleum coke, limestone, biomass, and/or sand when estimating fugitive emissions? How was the ash content chosen when ash silo fugitive emissions estimates were calculated?

The Division requests a response to these comments within thirty (30) business days following receipt of this letter. If you have any questions or need more information, please contact me at (404) 362-2700 or via email at tyneshia_tate@dnr.state.ga.us.

Sincerely,

Tyneshia Tate
Environmental Engineer
Stationary Source Permitting Program

cc: Peter Courtney
Ronald Vaughn, P.E. CH2M Hill