SEP 0 1 2010

CONCRETE BATCHING PLANT
AIR GENERAL PERMIT REGISTRATION FORM

SEP OU 200

Jureau or Air Monitorine.

Cureau of Air Monitorin

Mobile Sources

Part II. Notification to Permitting Office

(Detach and submit to appropriate permitting office; keep copy onsite)

Instructions: To give notice to the Department of an eligible facility's intent to use this air general permit, the owner or operator of the facility must detach and complete this part of the Air General Permit Registration Form and submit it to the appropriate Department of Environmental Protection or local air pollution control program office which has permitting authority. Please type or print clearly all information, and enclose the appropriate air general permit registration processing fee pursuant to Rule 62-4.050, F.A.C. (\$100 as of the effective date of this form)

Registration Type		
Check one: INITIAL REGISTRATION - Notification of intent to:	•	
Construct and operate a proposed new facility.		
Operate an existing facility not currently using an air genera	l permit (e.g., a facility proposing to go from	n an
air operation permit to an air general permit).		
RE-REGISTRATION (for facilities currently using an air gene		
Continue operating the facility after expiration of the current Continue operating the facility after a change of ownership.	t term of air general permit use.	
Make an equipment change requiring re-registration pursuan	t to Rule 62-210.310(2)(e). F.A.C., or any	
other change not considered an administrative correction und	der Rule 62-210.310(2)(d), F.A.C.	
FORMER BREDERO PRICE C	O SITE.	
Surrender of Existing Air Operation Permit(s) - For Initial Rep	gistrations Only	
If the facility currently holds one or more air operation permits, suc or operator upon the effective date of this air general permit. In suc operation permits being surrendered. If no air operation permits are	ch case, check the first box, and indicate the	
All existing air operation permits for this facility are hereby a general permit; specifically permit number(s):	surrendered upon the effective date of this ai	ir
No air operation permits currently exist for this facility.		
General Facility Information		
Facility Owner/Company Name (Name of corporation, agency, or i	ndividual owner who or which owns, leases	, <u>`</u>
operates, controls, or supervises the facility.)		
Port Dolphin Energy, LLC	1:	0 AUG 30
Site Name (Name, if any, of the facility site; e.g., Plant A, Metropo	lis Plant, etc. If more than one facility is	$\frac{\Omega}{\omega}$
owned, a registration form must be completed for each.)	ŢĘ.	0
	<u> </u>	3
Manatee Pipe Coating Plant	1.4	- 1
Facility Location (Provide the physical location of the facility, not r	necessarily the mailing address.)	<u>ب</u>
Street Address: 13231 Eastern Avenue	26	$\widetilde{\mathbf{e}}$
City:Palmetto County:Manatee Zip Code:34221-666	98	
Facility Start-Up Date (Estimated start-up date of proposed new fac	cility.)(N/A for existing facility)	\neg
January 2012		

DEP Form No. 62-210.920(2)(b) Effective: January 10, 2007 Owner/Authorized Representative

Name and Position Title (Person who, by signing this form below, certifies that the facility is eligible to use this air general permit.)

Print Name and Title: German Castro, Vice President

Owner/Authorized Representative Mailing Address

Organization/Firm:Port Dolphin Energy, LLC

Street Address: 400 North Tampa Street, Suite 1015

City: Tampa

County:Hillsborough

Zip Code:33602

Owner/Authorized Representative Telephone Numbers

Telephone:813-514-1398

Fax:813-388-4952

Cell phone (optional):

Facility Contact (If different from Owner/Authorized Representative)

Name and Position Title (Plant manager or person to be contacted regarding day-to-day operations at the facility.) Print Name and Title: Kevin Owen, HSE Manager

Facility Contact Mailing Address

Organization/Firm:Port Dolphin Energy, LLC

Street Address: 400 North Tampa Street, Suite 1015

City: Tampa

County:Hillsborough

Zip Code:33602

Facility Contact Telephone Numbers

Telephone:813-514-1398

Fax:813-388-4952

Cell phone (optional):

Owner/Authorized Representative Statement

This statement must be signed and dated by the person named above as owner or authorized representative I, the undersigned, am the owner or authorized representative of the owner or operator of the facility addressed in this Air General Permit Registration Form. I hereby certify, based on information and belief formed after reasonable inquiry, that the facility addressed in this registration form is eligible for use of this air general permit and that the statements made in this registration form are true, accurate and complete. Further, I agree to operate and maintain the facility described in this registration form so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof.

I will promptly notify the Department of any changes to the information contained in this registration

Signature

Type of Facility		
Check one:		
Stationary Facility	⊠ Relocatable Facility	
m () cD	A D. AH. Could D. Colons	
Type(s) of Reasonable Precautions Used		
Check all precautions to be used for the r	Pave Parking Areas	Pave Yards
☐ Pave Roads ☐ Maintain Roads/Parking/Yards ☐ Remove Particulate Matter	Use Water Application Reduce Stock Pile Height	Use Dust Suppressant Install Wind Breaks
Check all precautions to be used for the r	nanagement of drop points to trucks	:
Spray Bar	⊠ Chute ⊠ Partial enclosure	☐ Enclosure
Description of Reasonable Precautions		
Below, or as an attachment to this form, prounconfined emissions at the facility.	ovide details of all types of reasonab	ple precautions to be used to prevent
The types of reasonable precautions are as follows:	s that the facility will take to p	prevent unconfined emissions
(a) Management of roads, parking as of the followings:1. Maintenance of roads, parking are2. Application of water or environm	eas, and yards.	
control emissions. 3. Removal of particulate matter from	m roads and other paved area	under control of the owner or
operator to mitigate re-entrainment, particulate matter.	and from building or work are	eas to reduce airborne
4. Reduction of stockpile height or in particulate matter from stockpiles.	nstallation of wind breaks to n	nitigate wind entrainment of
(b) Use of spray bar, chute, or partia (c) Minimization of interior truck tra		ons at drop points.
(d) Use of covered hoppers in concre	ete coating system.	<u> </u>
(e) Covering stockpiles to reduce em	nissions is under consideration	although credit is not taken in
the emission calculations.		authough credit is not taken in
[Rule 62-296.320(4)(c), F.A.C.]		WENT OF
		9: 3 9: 3
		6 O

DEP Form No. 62-210.920(2)(b) Effective: January 10, 2007

Description of Facility

Below, or as an attachment to this form, provide a description of the concrete batching plant operations at the facility in sufficient detail to demonstrate the facility's eligibility for use of this air general permit and to provide a basis for tracking any future equipment or process changes at the facility. Describe all air pollutant-emitting processes and equipment at the facility, and identify any air pollution control measures or equipment used.

PROCESS DESCRIPTION:

The proposed facility will consist of a portable concrete batch plant; specifically the plant will be of a wrap, compression type design. The concrete weight coating system is designed to provide negative buoyancy and mechanical protection for pipelines in submarine and wet environments. Compression coat uses a side-wrap application process making it ideal for both small and large diameter pipelines.

OPERATION:

Sand, Portland cement types I/II, iron ore are brought on site. Sand and iron ore are stored in stockpiles; Portland cement is stored in a sealed silo, which is equipped with baghouse. Cement storage is limited by silo size (silo is filled via bulk delivery trucks during production). Sand and gravel is generally stored at a minimum weekly supply, depending on availability. Iron ore is generally purchased and stored by ship load quantities.

Sand and iron ore are transferred to elevated storage bins by front-end loaders. Sand, iron ore, Portland cement, and water are mixed to manufacture concrete. Pipes to be concrete coated are placed on in-bound-jeep rack. Pipes are inspected and repaired as necessary. Sections of pipe are conveyed through the coating line. A small amount of non-VOC adhesive is applied to the pipe. Pipes are then placed and conveyed on spiral conveyor through coating head where concrete, reinforced wire and plastic moisture barrier (polyethylene sheet) is applied. Solvent is used to flush the adhesive application lines. Concrete coated pipe exits coating head via conveyor belts. Pipe is removed from coating line, placed on concrete cutback station where concrete coating and wire is cut to proper cutback requirements. Pipe is then moved to scales, pipe is weighed and all measurements are recorded. Pipe is then moved to curing area. The plastic poly wrap is removed on pipe load out.

Concrete coating production will vary according to pipe size, concrete weight coating applied thickness, mix design, ambient weather conditions, and daily production hours.

EMISSIONS:

Emissions from the concrete coating operations will include PM, PM10, and PM2.5 from sand and aggregate storage piles as well as concrete batching. VOC emissions will result from flushing adhesive application lines with solvent.

See Attachment B for emission calculations and Attachments C and D for the area map and the plant layout and process flow diagram, respectively.

* SEE ATTACHED EMAIL AS AN ADDENDUM TO THIS FORM, 9/10/10.

ATTACHMENT B EMISSION CALCULATIONS

DALLING STATES

PORT DOLPHIN ENERGY, LLC PORT MANATEE, FL - CONCRETE BATCH PLANT

TABLE 1a: SUMMARY OF EMISSIONS

Total	PM	PM ₁₀	PM _{2.5}	НАР	voc	Units
Plant-wide	15.9	5.4	0.6	0.50	0.8	ТРҮ
<u> </u>	16.0	5.4	0.7	0.5	0,8	

TABLE 1b: EMISSIONS BY CATEGORY

Type of Operation		Amount	Units	Pollutant	Emissions	Units	Controls
Concrete Batching O	perations	95,750	TPY	PM	0.96	TPY	Fabric Filter, watering
				PM_{10}	0.36	TPY	Fabric Filter, watering
				HAPs	0.0003	TPY	Fabric Filter
Wind Erosion	Ore Pile	3	acres	PM	4.1	TPY	water sprays
				PM_{10}	2.0	TPY	water sprays
				PM _{2.5}	0.3	TPY	water sprays
	Sand Pile	0.5	acres	PM	1.1	TPY	water sprays
				PM_{10}	0.5	TPY	water sprays
				PM _{2.5}	0.1	TPY	water sprays
Vehicle Traffic	Unpaved roads	3,679	VMT	PM	9.8	TPY	water sprays
	•			PM_{10}	2.5	TPY	water sprays
				PM _{2.5}	0.25	TPY	water sprays
Coating Operations	Solvent Usage	5	gal/day	VOCs	0.84	TPY	
-				HAPs	1005	lb/yr	

Note: VMT = vehicle miles traveled; acres based on open areas at any one time.

Sources:

USEPA, 2006; AP-42, Section 13.2.4 for Aggregate Handling and Storage Piles.

USEPA, 2001; AP-42, Section 11.12 Concrete Batching.

USEPA, 2006; AP-42, Section 13.2.2 Unpaved Roads.

USEPA, 1992 Fugitive Dust Background and Technical Information Document for Best Available Control Measures;

Section 2.3.1.3.3, Wind Emissions from Continuously Active Piles.

PORT DOLPHIN ENERGY, LLC PORT MANATEE, FL - CONCRETE BATCH PLANT TABLE 2: PM EMISSIONS

Operating Hours: 9 production hours per day/ 5 days per week = 2,349 hrs/yr

Operating Days: 365 days per year

COMPONENT NAME	Raw Material (short tons)	Raw Material (lbs)	Raw Material (TPY)
Cement	13,750	27,500,000	13,750
Sand/Gravel/Crushed Limestone	20,000	40,000,000	20,000
Ore	62,000	124,000,000	62,000
Total:	95,750	191,500,000	95,750

COMPONENT	PM EF (lb/ton)	PM ₁₀ EF (lb/ton)	COMPONENT (TPY)	PM (lbs/yr)	PM ₁₀ (lbs/yr)	PM (TPY)	PM ₁₀ (TPY)
Aggregate Transfer*	0.0069	0.0033	62,000	427.8	204.6	0.214	0.102
Sand Transfer*	0.0021	0.00099	20,000	42.0	19.8	0.021	0.010
Cement unloading to elevated storage							
silo	0.00099	0.00034	13,750	13.6	4.7	0.007	0.002
Weigh Hopper Loading*	0.0051	0.0024	82,000	418.2	196.8	0.209	0.098
Mixer Loading	0.0173	0.0048	13,750	237.9	66.0	0.119	0.033
Truck Loading	0.0568	0.016	13,750	781.0	220.0	0.391	0.110
			Total:	1920.49	711.88	0.96	0.36

Note:

*Actual weigh hopper (sand & aggr) emissions assumed uncontrolled since AP-42 reports "no data" for controlled.

1 lb = 0.0005 short ton

Source:

Emissions Factors from EPA's AP-42, Chapter 11, Table 11.12-2 (6/06)

PORT DOLPHIN ENERGY, LLC PORT MANATEE, FL - CONCRETE BATCH PLANT TABLE 3: METAL EMISSIONS

	COMPONENT		EMISSION FACTORS (lb/ton)							
COMPONENT	(tons/year)	Arsenic	Beryllium	Cadmium	Total Chromium	Lead	Manganese	Nickel	Total Phosphorous	Selenium
Cement Silo Filling										
w/fabric filter	13,750	4.24E-09	4.86E-10	4.86E-10	2.90E-08	1.09E-08	1.17E-07	4.18E-08	ND	ND
Central Mix Batching				_						
w/fabric filter	13,750	1.87E-08	ND	7.10E-10	1.27E-07	3.66E-08	3.78E-06	2.48E-07	1.20E-06	ND
Truck Loading w/fabric										·
filter	13,750	1.16E-06	1.04E-07	9.06E-09	4.10E-06	1.53E-06	2.08E-05	4.78E-06	1.23E-05	1.13E-07

		EMISSION ESTIMATES (TPY)								
COMPONENT	Arsenic	Beryllium	Cadmium	Total Chromium	Lead	Manganese	Nickel	Total Phosphorous	Selenium	TOTAL
Cement Silo Filling										
w/fabric filter	2.9E-08	3.3E-09	3.3E-09	2.0E-07	7.5E-08	8.0E-07	2.9E-07	ND	ND	1.4E-06
Central Mix Batching										
w/fabric filter	1.3E-07	ND	4.9E-09	8.7E-07	2.5E-07	2.6E-05	1.7E-06	8.3E-06	ND	3.7E-05
Truck Loading w/fabric										
filter	8.0E-06	7.2E-07	6.2E-08	2.8E-05	1.1E-05	1.4E-04	3.3E-05	8.5E - 05	7.8E-07	3.1E-04_
Total	8.1 E-06	7.2E-07	7.1E-08	2.9E-05	1.1E-05	1.7E-04	3.5E-05	9.3E-05	7.8E-07	3.5E-04

Source:

Emissions Factors from EPA's AP-42, Chapter 11, Table 11.12-8 (6/06)

ND = not detected

PORT DOLPHIN ENERGY, LLC PORT MANATEE, FL - CONCRETE BATCH PLANT TABLE 4: WIND EROSION

		Store	
Parameters		Iron Ore	Sand
perational Data			
Activity, hours		24	24
days		365	365
laterial Handling Data		202	2
Material type		iron ore	sand
Moisture content (M), % (nominal)		1.77	4.17
torage Pile Data			
Pile Description (shape)		square	square
Size, acres		3	0.5
General/ Site Characteristics			
Mean wind speed, mph		7.83	7.83
Particle size multiplier, PM (k)		1	1
Particle size multiplier, PM ₁₀ (k)		0.5	0.5
Particle size multiplier, PM _{2.5} (k)		0.075	0.075
anticle size manipiler, TM _{2.5} (a)		0.073	0.073
Days of precipitation greater than or			
equal to 0.01 inch (p)		120	120
Time (%) that unobstructed wind speed			
exceeds 5.4 m/s at mean pile height (f)		15.81	15.81
Silt content (s), %		15	3.9
Emission Control Data			
Emission control method		Water sprays	Water sprays
Emission control removal efficiency, %		60	60
mission Factor (EF) Equation for Wind	Erosion		
Uncontrolled EF (UEF) Equation		UEF ($\frac{1b}{day}/acre$) = k x 1.7 x (s	(1.5)
,		x ((365 - p)/	•
Controlled (Final) EF (CEF) Equation		CEF (lb/day/acre) = UEF (lb/da	
		, , , ,	noval efficiency (%))
alculated PM Emission Factor (EF)			
ncontrolled EF, lb/day/acre		18.68	4.86
ontrolled EF, lb/day/acre		7.47	1.94
alculated PM10 Emission Factor (EF)			
ncontrolled EF, lb/day/acre		9.34	2.43
ontrolled EF, lb/day/acre		3.74	0.97
liculated PM2.5 Emission Factor (EF)			
acontrolled EF, lb/day/acre		1.40	0.36
entrolled EF, lb/day/acre		0.56	0.15
timated Emission Rate (CER)			
PM	TPY	4.09	1.06
1 141		2.05	0.53
PM ₁₀	TPY	/ 113	

Source

USEPA, 1992. Fugitive Dust Background and Technical Information Document for Best Available Control Measures, Section 2.3.1.3.3, Wind Emissions from Continuously Active Piles.

K factors from EPA AP-42 Section 13.2.5.3.

Silt content per EPA's AP-42 Table 13.2.4-1.

Precipitation days estimated based on Figure 13.2.2-1 AP-42 Chapter 13.2.2.

PORT DOLPHIN ENERGY, LLC PORT MANATEE. FL - CONCRETE BATCH PLANT TABLE 5: TRUCK TRAFFIC ON UNPAVED ROADS

			TRUCK TRAFFIC	
arameters	cement pile	Sand/Gravel pile	Pipes	Units/Comments
Number of truck trips	6	7	68	
Number of miles/per truck round trip	0.38	0.38	0.38	
Total road transport (miles/day)	2.3	2.6	25.9	
Total road transport (miles/yr)	830	935	1,914	
PM(TSP)				
$E = k \times (s/12)^{3} \times (w/3)^{h}$	6.7	6.7	6.5	Ib/VMT PM(TSP)
where a = 0.7 and b= 0.45, k = 4.9 for TSP	2.3	2.6	25.9	miles per day
=4,8 per EPA AP-42 Table 13.2.2-1	15.2	17.2	166.9	lb/day
v = average weight of truck (loaded and unloaded)	2.8	3,1	30.5	tons per year uncontrolled without rainfall
Emission control method:	water spray	water spray	water spray	
Emission control removal efficiency (%):	60	60	60	%
Accounting for rainfall using (365-P)/365 and Control: P= 120 days (estimated based on Figure 13.2.2-1 AP-42 Chapter 13.2.2)	0.75	0,84	8.18	PM (TSP) tons controlled with rainfall
PM ₁₀				
$E=k \times (s/12)^a \times (w/3)^b$	1.7	1.7	1.6	lb/VMT PM ₁₀
where $a = 0.9$ and $b = 0.45$, $k = 1.5$ for PM_{10}	2.3	2.6	25.9	miles per day
s =4.8 per EPA AP-42 Table 13.2.2-1	3,9	4.4	42.5	lb/day
w = average weight of truck (loaded and unloaded)	0.7	0.8	7.8	tons per year uncontrolled without rainfall
Emission control method:	water spray	water spray	water spray	
Emission control removal efficiency (%):	60	60	60	%
Accounting for rainfall using (365-P)/365 and Control:	0,19	0.21	2.08	PM ₁₀ tons controlled with rainfall
P= 120 days (estimated based on Figure 13.2.2-1 AP-42 Chapter 13.2.2)				
<u>PM,,</u>				
$E=k \times (s/12)^a \times (w/3)^b$	0.2	0.2	0.2	Ib/VMT PM _{2,5}
where $a = 0.9$ and $b = 0.45$, $k = 0.15$ for PM _{2.5}	2.3	2.6	25.9	miles per day
s =4.8 per EPA AP-42 Table 13.2.2-1	0.4	0.4	4.3	lb/day
w = average weight of truck (loaded and unloaded)	0.1	0.1	0.8	tons per year uncontrolled without rainfall
Emission control method;	water spray	water spray	water spray	, ,
Emission control removal efficiency (%):	60	60	60	%
Accounting for rainfall using (365-P)/365 and Control:	0.019	0,021	0.208	PM _{2.5} tons controlled with rainfall
P= 120 days (estimated based on Figure 13.2.2-1 AP-42 Chapter 13.2.2)	V.U.	V.023	0.200	12

Source:

USEPA, 2006; AP-42, Section 13.2.2 for Unpaved Roads.

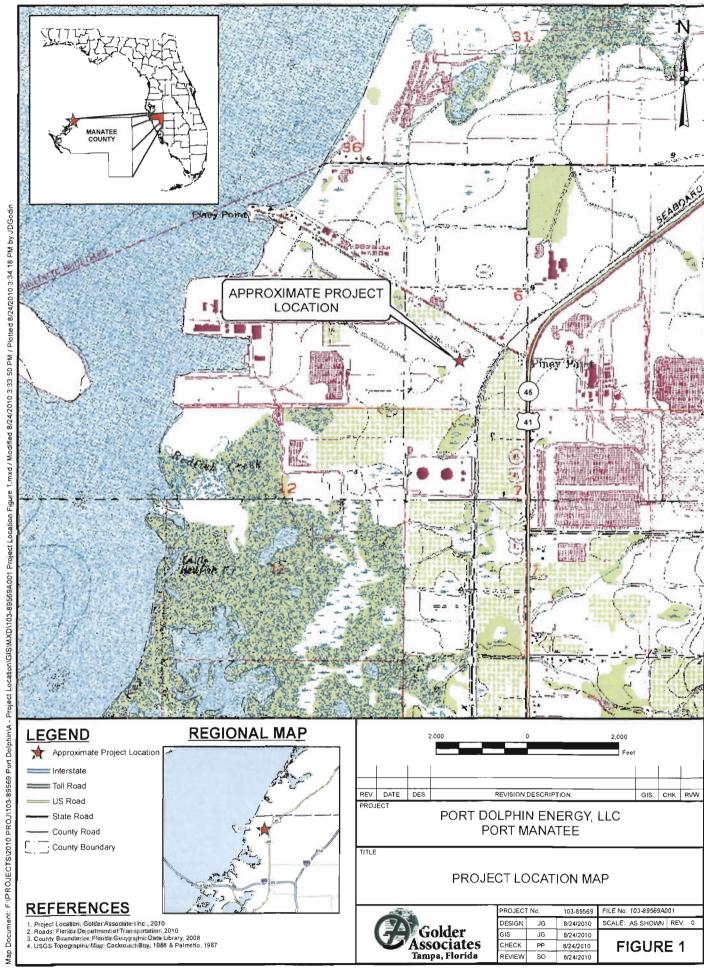
PORT DOLPHIN ENERGY, LLC PORT MANATEE, FL - CONCRETE BATCH PLANT TABLE 6: SOLVENT USAGE

Production Days	74		
Hours per day	9		
Annual Operating Hours (hr/yr)	666		
Avg Daily Solvent Usage (gal/day)	3.5		
Solvent Name	SW-267/S0	G-KJ#1	
Density (lb/gal)			
	Toluene	7.24	
	Acetone	6.61	
	Isopropanol	6.56	
	Methanol	6.61	
Maximum Emission Estimates (lb/day)		SW-267	SG-KJ#1
	Toluene	12.7	12.7
	Acetone	8.1	NA
	Isopropanol	1.1	NA
	Methanol	0.5	0.9
<u>'OCs</u>			
Maximum Emission Estimates		TPY	
	Toluene	0.47	
	Acetone	0.30	
	Isopropanol	0.04	
_	Methanol	0.03	
	Total	0.84	
IAPs*			
Maximum Emission Estimates		<u>lb/yr</u>	TPY
	Toluene	937	0.47
_	Methanol	68	0.03
_	Total	1,005	0.5

Note:

^{*} Rule 62-210.300(3) provides for exemptions from permitting requirements. Subheading 27 addresses surface coating operations and provides an exemption if the coatings contain 5.0% or less VOC, by volume, or the total quantity of coatings containing greater than 5.0% of VOC used at the facility shall not exceed 6.0 gallons per day, averaged monthly, where the quantity of coatings used includes all solvents or thinners used in the process, or for cleanup. The proposed operation will use an adhesive that contains no VOCs and the solvent used for cleanup (which contains greater than 5.0% VOCs) will be less than an average of 6 gallons per day. In addition, this activity will meet the criteria for generic unit exemption under 62-210.300(3)(b)(1).

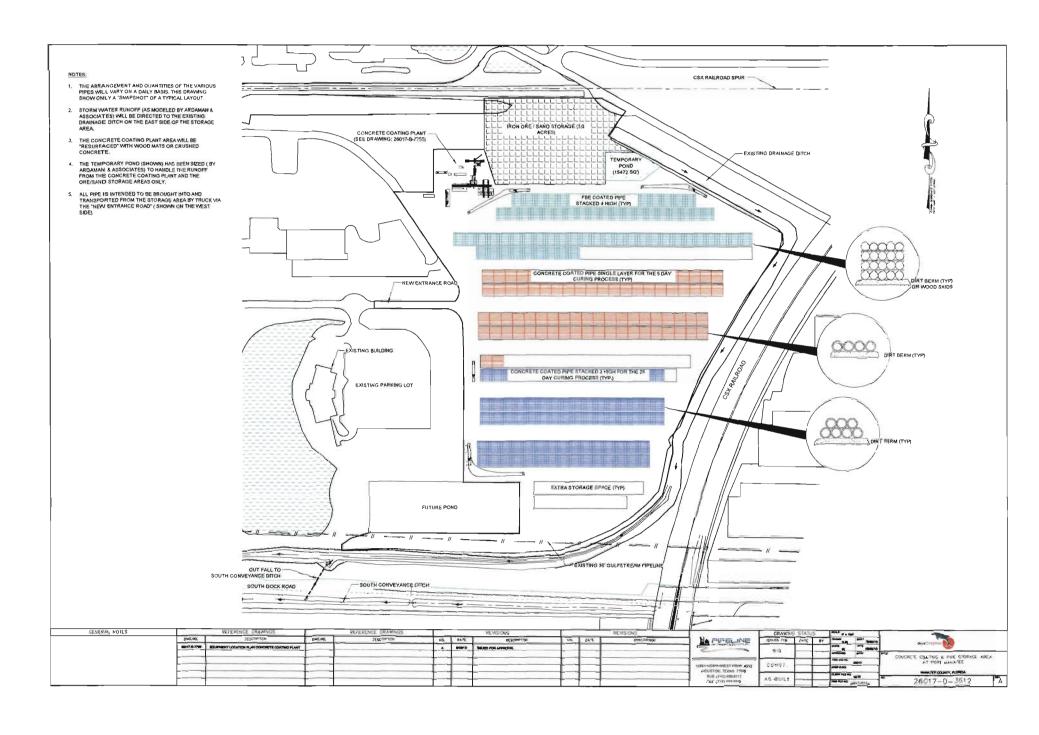
ATTACHMENT C FIGURE 1: AREA MAP

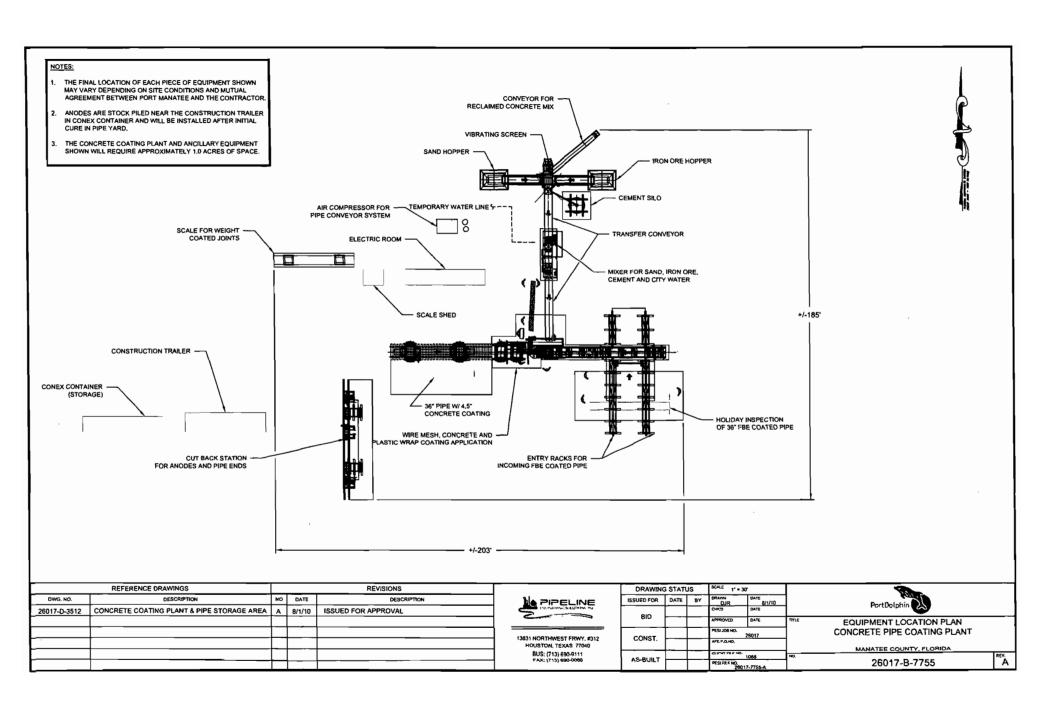


ATTACHMENT D

FIGURE 2: PLANT LAYOUT

FIGURE 3: PROCESS FLOW DIAGAM







RECEIVED

ISTP 0 1 2010

Curedalephone விற்கிர்வர்ஷ் ஃFaxobile 983788934952 www.portdolphin.com

Port Dolphin Energy LLC 400 North Tampa Street, Suite 1015 Tampa, FL 33602, USA August 26, 2010

> FDEP Receipts 3800 Commonwealth Blvd. Tallahassee, FL 32399

Attn.: Mr. Dickson Dibble

Re: Port Dolphin Energy, LLC

Concrete Batch Plant at Port Manatee, FL

Air General Permit

Dear Mr. Dibble:

Port Dolphin Energy, LLC (Port Dolphin) proposes to install and operate a temporary, mobile concrete batching operation at Port Manatee, Florida. This operation will support construction of the pipeline associated with the Port Dolphin project by providing concrete weight coating on the pipe. The purpose of the concrete weight coating is to provide mechanical protection and negative buoyancy for buried or submarine pipelines.

The construction of the pipeline is currently scheduled to commence in 2012 and take approximately 18 months to complete. Port Dolphin anticipates the concrete batching plant will be operated for a shorter period of time. However, the actual time duration for this temporary operation has not been established.

The Florida Department of Environmental Protection (Department or DEP) has established an "air general permit" at Florida Administrative Code ("F.A.C.") Rule 62-210.310(5)(b) for concrete batching plants. We understand that the use of this authorization by any individual facility does not require action by the Department, as the terms and conditions of the air general permit are provided in the Department's rules, rather than in a separately issued air construction or air operation permit. Further, we understand that the general air permit authorization can be obtained within 30 days of the registration submittal and the use of the permit is limited to 5 years.

Enclosed are the application report and a check for \$100.00 for the "air general permit" for the Port Dolphin concrete batching plant. The attached application report demonstrates that the proposed facility will meet the specific eligibility criteria given in the applicable air general permit at subsection 62-210.310(4) or (5), F.A.C., and the following general criteria:

- The facility shall not emit nor have the potential to emit 10 tons per year or more of any hazardous air pollutant, 25 tons per year or more of any combination of hazardous air pollutants, or 100 tons per year or more of any other regulated air pollutant; and
- The facility shall not be collocated with, or relocated to, another such facility; or create such a facility in combination with any other collocated facilities.

If you should have any questions regarding this application, please contact Mr. Kevin Owen, the Port Dolphin Health, Safety, and Environmental (HSE) Manager by telephone at 813-514-1398.

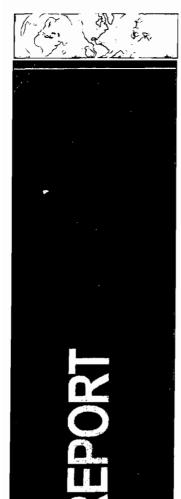
Sincerely,

German Castro, Vice President Port Dolphin Energy, LLC

Attachment

Cc: Scott Osbourn, P.E., Golder Associates

ZIM AUG 30 MAY 2 TO





[- 2 0 1 20 D

E meau of Air Monitoring Cobile Sources

AIR GENERAL PERMIT

PORT DOLPHIN ENERGY, LLC **CONCRETE BATCH PLANT**

Submitted To: Port Dolphin Energy, LLC

400 North Tampa Street

Suite 1015

Tampa, FL 33602

Submitted By: Golder Associates Inc.

5100 W. Lemon Street

Suite 208

Tampa, FL 33609 USA

Distribution: 2 Copies - Florida Department of Environmental Potection

2 Copies - Port Dolphin, LLC 1 Copy – Golder Associates Inc.

August 2010

103-89569

A world of capabilities delivered locally

Table of Contents

Attachment A - AIR GENERAL PERMIT NOTIFICATION FORM - CONCRETE BATCHING PLANT

Attachment B - EMISSION CALCULATIONS

Attachment C - AREA MAP

Attachment D - PLANT LAYOUT AND PROCESS FLOW DIAGRAM

SHUMOOF SAFERS

HOAUG 30 AM Q. 20

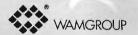


ATTACHMENT A AIR GENERAL PERMIT NOTIFICATION FORM -- CONCRETE BATCHING PLANT DEP Form No. 62-210-920(8)

DEPARTMENT of ENVIRONMENTAL PROTECTION BUREAU of NEW SOURCE REVIEW CONTROL DATA SHEET DUST COLLECTOR

MANUFACTURER:WAM
MODEL:SILOTOP R01
SPECIFY BAGHOUSE X_ CARTRIDGE OTHER
NUMBER OF BAGS OR CARTRIDGES:7
SIZE OF BAG OR CARTRIDGE:36.5" (926mm)X 16.7"(425mm)_
TOTAL BAG OR CARTRIDGE AREA (FT2)264
MAXIMUN CAPACITY (ACFM)1500
BAG OR CARTRIDGE FABIXSPUNBOUND POLYESTER
FABRIC WEIGHT (oz)8_
WEAVE10 MICRON
FINISHCOATED
MAXIMUM FABRIC TEMPERTURE175 DEGREES (F)
EFFICINCY (%)99.9%
AIR TO CLOTH RATIO6:1
METHOD OF CLEANING: REVERSE AIR X_ PULSE JET SHAKER
OPERATING PRESSURE DROP: MIN _4_ MAX _8_ (INCHES OF WATER)
PARTICULATE GRAIN LOADING: INLET _30 OUTLET01_
FAN REUIRMENTS HP SCFM VENTING Y





SILO VENTING FILTER SILOTOP

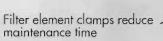
R01 Series







BODY	FILTER SURFACE	MAX, HEIGHT WHEN CLOSED	MAX, HEIGHT WHEN OPEN	lbs (kg)
Ø 31.5 inches	264 ft ²	45 inches	73 inches	225
(800 mm)	(24.5m ²)	(1145 mm)	(1850 mm)	(102)







Inspection hatch

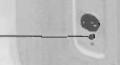
Heavy-duty 16 gauge 304 stainless steel body with bottom flange - thickness 0.04



Obstruction-free extruded aluminum manifolds for optimum air flow

Drain point



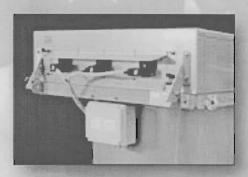


TOP'

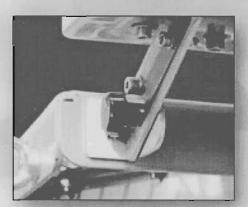
Weather protection cover with lockable snap hook



Manifolds integrated into the hood



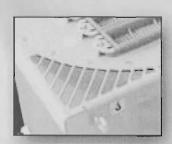
Weather protection cover "Autolock" hinges self-locking when open

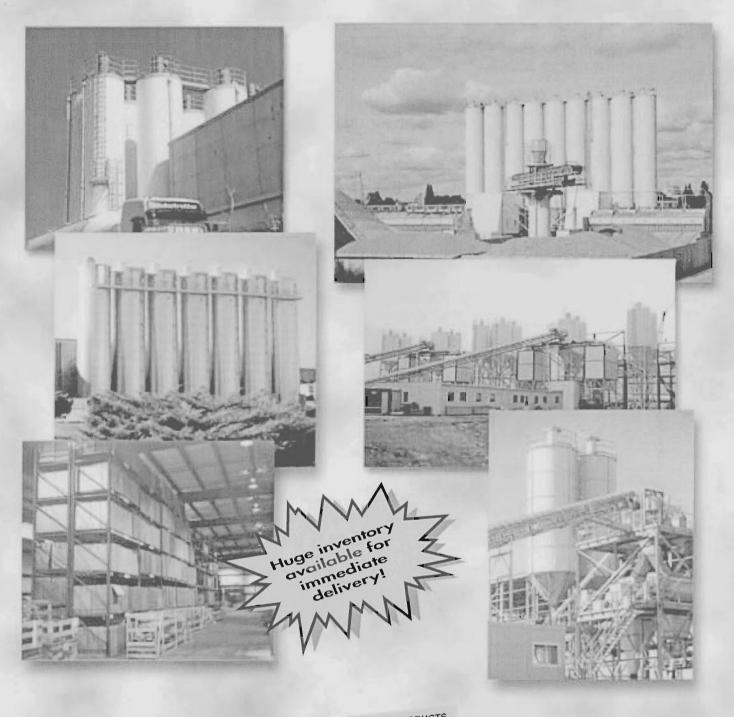


Steel frame with integrated birdcage



POLYPLEAT® filter cartridges with integrated Venturi shafts guarantee optimum filter surface - air to cloth ratio





















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Georgia Division
75 Boulderbrook Circle
Lawrenceville GA - 30045 - USA
770 - 339 67 67
fax 770 - 339 47 27
videoconference 678 377 08 81
e-mail: wamgeorgia@waminc.com
internet: www.waminc.com

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1300 Triad Blvd.
Fort Worth, TX - 76131 - USA
28 817 - 232 26 78
fax 817 - 232 26 76
e-mail: wamtexas@waminc.com
internet: www.waminc.com

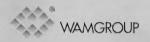
WAM.035.05.US



DEPARTMENT of ENVIRONMENTAL PROTECTION BUREAU of NEW SOURCE REVIEW CONTROL DATA SHEET DUST COLLECTOR

MANUFACTURER:WAM
MODEL:FC.1.J.04
SPECIFY BAGHOUSEX_ CARTRIDGEOTHER
NUMBER OF BAGS OR CARTRIDGES:3
SIZE OF BAG OR CARTRIDGE:5.25" X 30"
TOTAL BAG OR CARTRIDGE AREA (FT2)45FT2
MAXIMUN CAPACITY (ACFM)150
BAG OR CARTRIDGE FABIX POLYESTER
FABRIC WEIGHT (oz)9
WEAVE10 MICRON
FINISHCOATED
MAXIMUM FABRIC TEMPERTURE160 DEGREES (F)
EFFICINCY (%)99.9
AIR TO CLOTH RATIO6:1
METHOD OF CLEANING: REVERSE AIRX_ PULSE JET SHAKER
OPERATING PRESSURE DROP: MIN _4_ MAX8_ (INCHES OF WATER)
PARTICULATE GRAIN LOADING: INLET30_OUTLET01_
FAN REUIRMENTS HP SCFM VENTINGX_





ROUND DUST COLLECTORS RUNDE ENTSTAUBUNGSFILTER FILTRES RONDS FILTRI TONDI

WINEGO







Thanks to compact design no ladders or platforms required to carry out maintenance.

Dank kompakter Abmessungen sind zur Wartung weder Leitern, noch Gerüste erforderlich.

Grâce aux dimensions compactes aucun besoin d'échelles ou galeries pour l'entretien.

Grazie alle dimensioni compatte non c'è alcun bisogno di scale o ballatoi per la manutenzione.



Minimum pressure loss of air distributor means higher cleaning efficiency.

Minimaler Druckverlust der Verteilerelemente gleichbedeutend mit höherem Reinigungsgrad.

Pertes de pression minimum du distributeur d'air: efficacité plus grande de nettoyage.

Perdite di pressione minime del distributore d'aria: maggiore efficacia di pulizia.

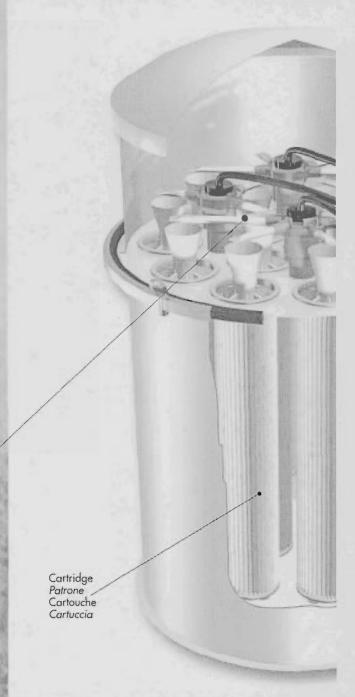


Certified according to ISO 9001-2000.

Zertifiziert nach ISO 9001-2000.

Certification ISO 9001-2000.

Certificazione ISO 9001-2000.



FEATURE - MERKMAL CARACTERISTIQUE - CARATTERISTICA	FUNCTION - FU FONCTION - FU
✓ Standard 304 stainless steel bady Gehäuse serienmäßig aus Edelstahl 1.4301 Corps standard en acier inox 304 Corps di serie in AISI 304	✓ Weutherproof finish (can be easily huned into food- Wettergeschütztes Finish (auf Wonsch leicht in nahru Résistance aux intemperies (qualité alimentaire sur r Resistenza alle intemperie (alimentare su richiesta)
Push-fit filter element assembly Filterelemente von Hand einpressbar Mantage manuel des éléments filtrants Elementi filtranti ad inrastro a mano	No tools, no hardware required Weder Werkzeug, noch Schraubenmaterial erforderli Aucun outil necessaire Nessun bisagna di utensili e bullaneria
✓ High-efficiency cleaning system Hoch effizientes Abreinigungssystem Système de nettoyage haute performance Sistema di pulizia ad elevota efficienza	Minimizes pressure loss Minimiert Druckverlust Réduction des pertes de charge internes Minimizza pardite di pressiane
✓ Wide range of filter elements Breites Programm an Filteralementen Importante gamme d'éléments liltrants Yasta gamma di elementi liltranti	Large number of dust collector options / bigh degree Vielzahl am Geräteoptionen / haher Grad an Austaus Grand nombre d'options machines possibles / baut c Gran numero d'opzioni di filtri / alto grado di intere

JEGO P



NKTION NZIONE	BENEFIT - VORTEIL AVANTAGE - VANTAGGIO	
grade) ngsmitteltaugliche Version wandelbar) Jemande)	Reduced maintenance costs thanks to longer durability Geringere Wartungskosten dank längerer Lebensdauer Couts de maintenance réduits grâce à la grande longévité Costi di manutenzione più bassi grozie ad una durata più lunga	
`ch	Reduced mainfenance costs Geringere Wartungskosten Cauls de mainfenance réduits Costi di manutenzione più bassi	
	Lawer operuting costs Geringere Betriebskosten Coûts d'exploitation inférieurs Casti di esercizio più bassi	
e of interchangeobility schbarkeit legré d'interchangeobilité ambiabilità	Individual problem solving Individual obgestimmte Problemlösungen Grande adaptation à l'installation Soluzioni individuali mirate	



With lower energy consumption the WAM fan offers 10-15% higer efficiency.

Bei geringerem Energieverbrauch bietet der WAM Ventilator einen um 10-15% höheren Wirkungsgrad .

> A une consommation d'énergie inférieure l'aspirateur WAM donne un rendement plus élevé du 10-15%

Ad un consumo energetico inferiore l'aspiratore WAM dà un rendimento superiore del 10 - 15%.



High filtration efficiency guaranteed through certified filter material (BIA cat.).

Hoher Filter-Wirkungsgrad gewährleistet durch zertifiziertes Filtervlies (BIA-Kat.).

Grande efficacité de filtration assurée par moyen filtrant certifié (cat. BIA).

Elevata efficienza di filtrazione garantita dal media filtrante certificato (cat. BIA).



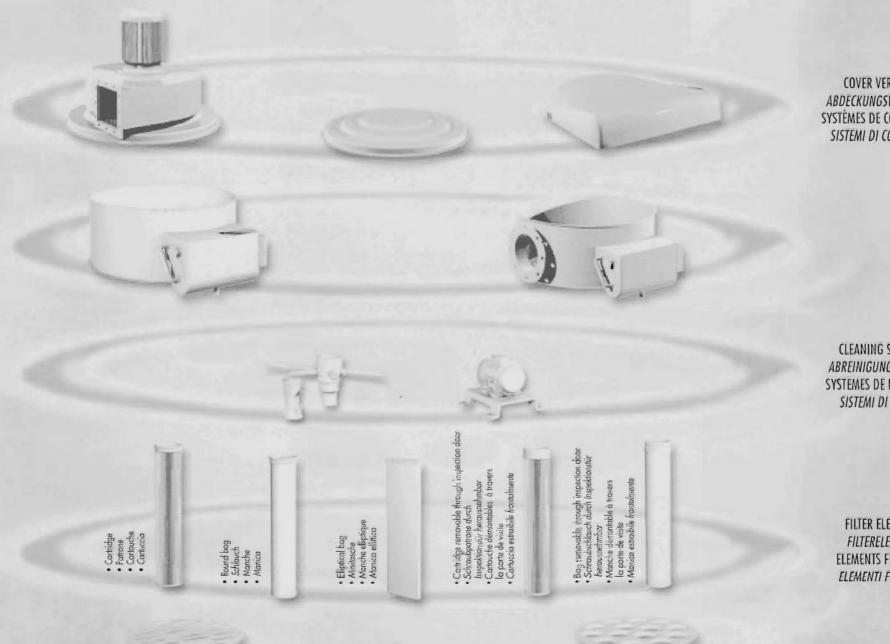
Thanks to a special PATENTED pretensioning device in the filter bag the filter media is kept stretched in each stage of filtering. This results in less flow resistance and more durable elements.

Dank einer PATENTIERTEN Vorspannvorrichtung ist das Filtervlies bei der Schlauchversion in jeder Arbeitsphase gespannt; der Effekt: geringere Strömungsverluste und längere Lebensdauer der Elemente.

Grâce à un prétenseur spécial BREVETÉ, le tissu filtrant des manches reste toujours tendu dans chaque phase du travail: il y a moins pertes de charge et une durée plus longue des éléments.

Grazie ad uno speciale tensionatore BREVETTATO, il tessuto filtrante delle maniche rimane sempre teso in ogni fase di lavoro: si hanno minori perdite di carico e maggior durata degli elementi.

MODULAR DESIGN - MODULBAUWEISE - MODULARITE - MODULARITÁ



COVER VERSIONS ABDECKUNGSVARIANTEN SYSTÉMES DE COUVERTURE SISTEMI DI COPERTURA

CLEANING SYSTEMS ABREINIGUNGSSYSTEME SYSTEMES DE NETTOYAGE SISTEMI DI PULIZIA

FILTER ELEMENTS **FILTERELEMENTE ELEMENTS FILTRANTS** ELEMENTI FILTRANTI



- Possible to vary number of solenoid valves. Electronic control with cycle timer. Only pneumatically controlled cycle timer. Intelligent cleaning both for electronically and pneumatically controlled version.

- Anzahl der Magnetventile veränderbar. Elektroniksteuerung mit Zyklus-Timer. Nur pneumatisch gesteuerter Zyklus-Timer. Intelligente Reinigung sowohl bei elektronisch, als auch bei pneumatisch gesteuerter Version.

- Possibilité de varier le nombre d'électrovannes. Commande électronique avec temporizateur cyclique. Temporisateur cyclique complètement pneumatique. Nettoyage intelligent en version électronique et pneumatique.

- Possibilità di variare il N° di elettrovalvole. Comando elettronico con temporizzatore ciclico. Temporizzatore ciclico completamente pneumatico. Pulizia intelligente sia in versione elettronica che pneumatica.

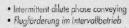
PNEUMATIC CONVEYING PNEUMATISCHE FÖRDERUNG

TRANSPORT PNEUMATIQUE TRASPORTO PNEUMATICO



- Continuous dilute phase conveying
 Flugförderung im Dauerbetrieb





- Transport en pression intermittent (phase diluée)
- Trasporto in pressione (fase diluita) intermittente







- Pressure (dense phase) conveying
 Druckförderung (Phropfenförderung)

- Transport en pression (phase dense)
 Trasporto in pressione (fase densa)







- · Dust contral of small cyclones
- Entstoubung von kleineren Zyklonen
 Dépoussiérage de cyclones petits
- · Depolverazione di piccoli cicloni



WAM has been involved for many years in dust collection for various industrial applications.

Continuous efforts in research and development, and a total commitment to quality led to this range of round body dust collectors named the WAMECO® F - type.

Particularly suitable for dust collection in pneumatic conveying for either positive or negative pressure systems, the F - range mounts highly efficient filtering elements made from tried and tested BIA - certified media.

Les filtres WAMECO® de la série F ont été étudié pour le dépoussiérage de l'air véhiculant des pulvérulents dans les différents secteurs de l'industrie et sont particulièrement recommandés pour le transport pneumatique en pression et en dépression.

Grâce aux média filtrants de haute qualité (tous certifiés par B.I.A.) les filtres de la série F offrent une grande efficacité.

ON-THE-SPOT DUST CONTROL **VOR-ORT - ENTSTAUBUNG**

ASPIRATIONS LOCALISEES ASPIRAZIONI LOCALIZZATE

Die WAMECO® F - Filterserie ist das Ergebnis einer Entwicklung, deren ursprüngliche Zielsetzung bereits darin bestand, ein vielseitig verwendbares Entstaubungsfilter für diverse industrielle Einsätze zu konzipieren .

Ein hohes Qualitätsniveau in der Fertigung, bedingt durch eine weitgehend automatisierte Serienproduktion, ist eine der wichtigsten Voraussetzungen dafür, immer wieder neue Problemlösungen anbieten zu

Die F - Serie ist dabei besonders für die Entstaubung von pneumatischen Fördersystemen, sowohl im über-,als auch im Unterdruckbereich geeig-

Die verwendeten B.I.A. - zertifizierten Filtermedien bieten einen besonders hohen Wirkungsgrad und wurden vor ihrem Einsatz in der Serie umfangreichen Tests unterzogen.

I filtri WAMECO® serie F sono stati studiati per la depolverazione di numerose sorgenti polverose nei diversi settori industriali.

Gli elevati standard qualitativi consentono di affrontare con successo numerosissimi problemi di depolverazione, e sono particolarmente indicati per i trasporti pneumatici sia in pressione sia in depressione. Elevata efficienza di filtrazione: ogni materiale filtrante è rigorosamente testato e certificato dal B.I.A.



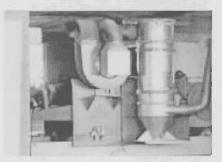
- Concrete mixer dust control
- Beton-Zwangsmischerentstaubung
- Dépoussiérage de malaxeurs à béto
 Depolverazione di mescolatari per calcestruzzo



- Belt conveyor dust control
- Förderbandentstaubung
- Dépoussiérage de transporteurs à ruban
 Depoiverazione di nastri trasportatori









- Manual bag openers
 Manuelle Sackentleerer
- Désacheuses manuelles







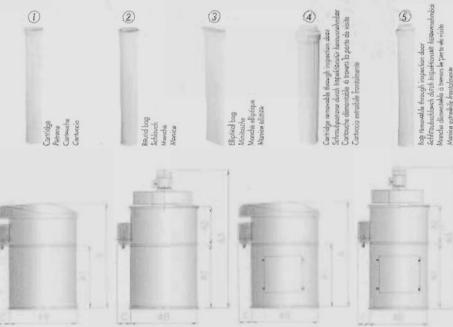


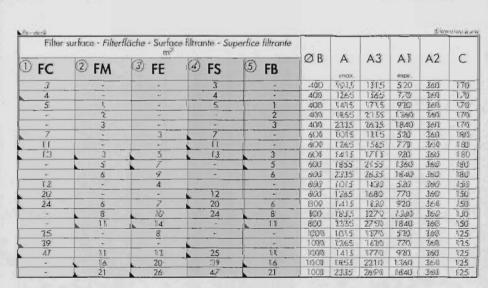
- Automatic bog splitters
 Automatische Sackentleerer
- Désacheuses automatiques
- · Rompisacchi automatiche

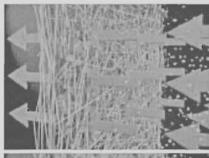


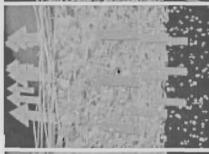
DUST FILTRATION - STAUBFILTRATION FILTRATION DE POUSSIÈRE - FILTRAZIONE POLVERI







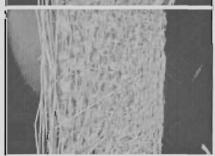








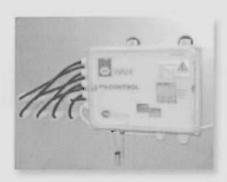




ACCESSORIES ZUBEHÖR









Standard 304 stainless steel body (316 on request)

Standard-Filtergehäuse aus Edelstahl 1.4301 (optional 1.4401)

Corps standard en inox 304 (316 sur demande)

Corpo standard in AISI 304 (316 su richiesta

Standard seal frame in carbon steel (304 or 316 st. st. on request)

Standard-Elementehalterungsplatte aus Stahl (optional Edelstahl 1.4301 ader 1.4401)

Plaque support éléments filtrants en acier au carbone (inox 304 ou 316 sur demande)

Piastra porta elementi filtranti in acciaio al carbonio (AISI 304 a 316 su richiesta)

Electronic control panel with integrated pressure differential meter

Elektronische Steuerung mit integriertem Druckdifferenzmesser

Carte électronique avec mesure de pression différentielle integrée

Scheda elettronica con misuratore differenziale di pressione integrato

Fan choke with round flange or rain cover

Ventilatordrossel mit rundem Flansch oder Regenschutzdach

Volet de réglage avec bride ou par pluie

Valvola parziolizzatrice con flangia tonda o parapioggia

ACCESSORES ACCESSORI



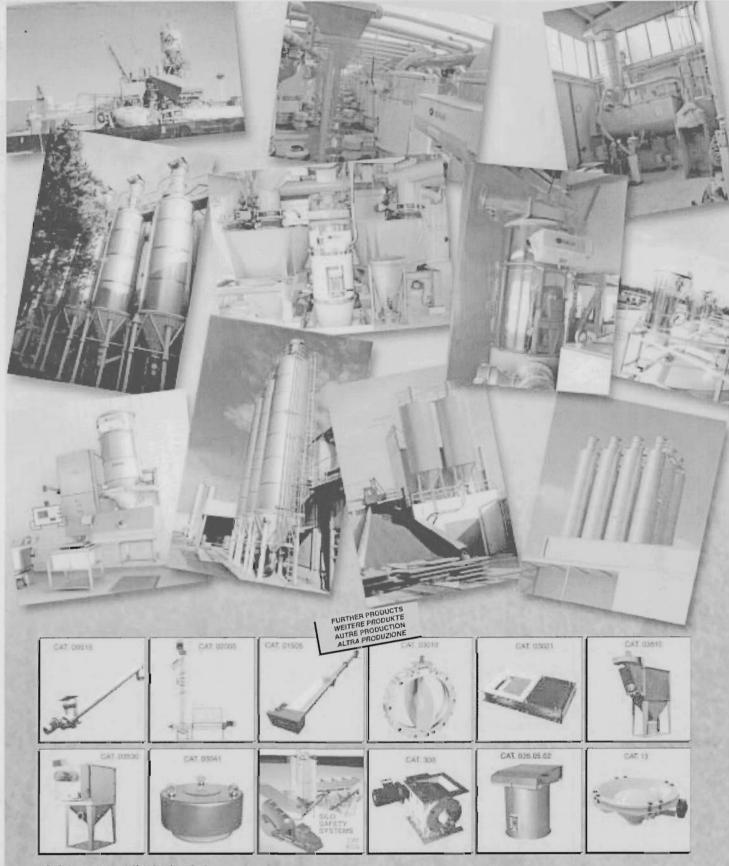












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WAM. 03505

07.03



* ADDENDUM TO # 08/0/9/1 - 002 PAGE 10, DESCRIPTION OF FACILITY

Dibble, Dickson

From:

Osbourn, Scott [Scott Osbourn@golder.com]

Sent:

Friday, September 10, 2010 1:35 PM

To:

Dibble, Dickson

Cc:

Kevin Owen

Subject:

FW: Port Dolphin Concrete Batch Plant

Attachments:

FC 1 J 04 (2).doc; usa SILOTOP 0802.pdf; WAMECO 0703.pdf; SILOTOP EPA SHEET.doc

Please see the attached documents as well as the following, supplied by the potential concrete batch plant vendor:

- Silo was designed and built by EB Pipe Coating who we purchased the plant. It has a 55 ton capacity.
 - The silo bag house is a WAM SILOTOP RO1 Series-264 ft² filter surface area (Info Attached).
 - The cement feed over the mixer is a WAM model WAMECO FC104containing 3 filters- 45 ft² filter surface area.. (Info Attached).
- Unit is not portable and will be slab mounted as a stationary unit.

One of Port Dolphin's concerns is that they are still negotiating with several vendors and don't want to get locked into a particular vendor spec (i.e., equipment make/model nos., etc.), although all vendors under consideration would have the same plant design and processing capability.

Regarding your other question below:

1) Our Air Resource Management (ARMS) indicates that an INACTIVE Concrete Batching Plant (Bedero Price Co.) exists, or rather was in existence on the 13231 Eastern Avenue site in Palmetto as late as 2003. Does it still exist, or has the equipment been removed and the site vacated?

That particular plant was temporarily in place to support the Gulfstream pipeline project and was removed after construction was complete. I'm not exactly sure of the timing, but is was likely removed more than 5 years ago. The concept would be the same here, that is, the plant would be removed after construction of the pipeline is complete.

I hope this answers your questions, but feel free to contact me at the number below if you still have concerns.

Scott Osbourn (P.E.) | Associate and Senior Consultant | Golder Associates Inc.

5100 West Lemon Street, Suite 208, Tampa, Florida, USA 33609

T: +1 (813) 287-1717 | D: +1 (813) 769-5304 | F: +1 (813) 287-1716 | C: +1 (727) 278-3358 | E:

Scott Osbourn@golder.com | www.golder.com

From: Dibble, Dickson [mailto:Dickson.Dibble@dep.state.fl.us]

Sent: Wednesday, September 01, 2010 2:22 PM

To: Osbourn, Scott Cc: Ajhar, Rebecca

Subject: RE: Port Dolphin Concrete Batch Plant

Scott,

We have received the subject item facility's Concrete Batching Plant (CCB) Air General Permit Registration form and supporting documentation. The form was date stamped received on August 30, 2010, which began the mandatory thirty (30) day review and processing period. The review and processing period serves also as a period of time in which to gather additional missing data, correct errors and update any changes to data on the form prior to the entitlement being issued.

As you may have picked up in the voice-mail message which I left on your phone there are some issues to be resolved. Specifically they are:

- 2) There is no reference as to the identification of process equipment and emission control equipment.
 - a. Silos (Make, Model #'s, capacities in Bbls, Tons, or Cu.Yds., product contained therein, etc.)
 - b. Baghouses or dust collectors (Make, model #'s, silotop or ground mounted, individual or central, filter types (cartridge or bag), filter area in sq.ft., etc.)
 - c. If any, batchers/mixers & related emission control equipment identification
- 3) Is this a true portable/relocatable unit (wheels), or will it be attached to the ground as in a stationary unit.
- 4) Our Air Resource Management (ARMS) indicates that an INACTIVE Concrete Batching Plant (Bedero Price Co.) exists, or rather was in existence on the 13231 Eastern Avenue site in Palmetto as late as 2003. Does it still exist, or has the equipment been removed and the site vacated?

We must resolve these issues before the expiration of the thirty (30) review period in order to proceed with the entitlement process. You may send the information to me electronically and I will simply attach that information as an addendum to the current submitted form. I only need one (1) copy, not four (4).

If you have any questions, comments, or concerns please e-mail or call.

I will be out of the office beginning this afternoon (1430 hrs) and will return on Wednesday, September 8, 2010.

Thank you for your assistance and have a great Labor Day Holiday weekend!

Sincerely yours,

Dickson E. Dibble

Dickson E. Dibble, ES III

FL Dept of Environmental Protection Div. of Air Resource Management Bureau of Air Monitoring & Mobile Sources Air General Permit Program Tel. (850) 921-9586 FAX (850) 922-6979 ICG-#345

Dickson.Dibble@dep.state.fl.us



Please note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure

From: Osbourn, Scott [mailto:Scott Osbourn@golder.com]

Sent: Tuesday, August 31, 2010 3:51 PM

To: Dibble, Dickson

Subject: Port Dolphin Concrete Batch Plant

Hopefully, you should have received our air application package by now. If not, please let me know.

I have 2 requests, if it's not too much trouble. First, the client wanted to know if you could provide some sort of receipt or acknowledgement that you had received the check for the processing fee. Second, I neglected to make a copy of the transmittal letter and wondered if you could possibly send a pdf version of the letter back to me.

Scott Osbourn (P.E.) | Associate and Senior Consultant | **Golder Associates Inc.** 5100 West Lemon Street, Suite 208, Tampa, Florida, USA 33609 T: +1 (813) 287-1717 | D: +1 (813) 769-5304 | F: +1 (813) 287-1716 | C: +1 (727) 278-3358 | E: Scott Osbourn@golder.com | www.golder.com

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Please consider the environment before printing this email.

Dibble, Dickson

From:

Dibble, Dickson

Sent:

Friday, September 10, 2010 7:10 AM

To: Cc: 'Osbourn, Scott'

Subject:

Ajhar, Rebecca RE: Port Dolphin Concrete Batch Plant

Attachments:

PortDolphinEnergyLLC-CoverLetter-CCBPlantAGPRegistration.pdf

Dear Scott,

Please accept my apologies for not getting this to you sooner, but I got so focused on trying to communicate to you regarding the missing information on the Concrete Batching Plant Air General Permit Form that I forgot to scan and send a copy of the cover letter to you.

As you can see, an electronic copy (.pdf file) is attached.

If you have any questions, comments or concerns, please e-mail or call.

Thank you and have a great day!

Sincerely yours,

Dickson E. Dibble

Dickson E. Dibble, ES III

FL Dept of Environmental Protection Div. of Air Resource Management Bureau of Air Monitoring & Mobile Sources Air General Permit Program Tel. (850) 921-9586 FAX (850) 922-6979 ICG-#345

Dickson.Dibble@dep.state.fl.us



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Sent: Tuesday, August 31, 2010 3:51 PM

To: Dibble, Dickson

Subject: Port Dolphin Concrete Batch Plant

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T: +1 (813) 287-1717 | D: +1 (813) 769-5304 | F: +1 (813) 287-1716 | C: +1 (727) 278-3358 | E: Scott Osbourn@golder.com | www.golder.com

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Please consider the environment before printing this email.

Recipient
'Osbourn, Scott'
Ajhar, Rebecca

Delivery

Delivered: 9/10/2010 7:13 AM