

Moore, Carol

From: Jim Sharpe [jsharpe@standardpurification.com]
Sent: Wednesday, November 30, 2011 2:07 PM
To: Moore, Carol
Cc: ken@airtest.fdn.com; Zhang-Torres; Zell, David; Prickett, Patricia; 'Kristine Switt'
Subject: RE: STANDARD CARBON, LLC; 0830170-005-AC

Carol,

Thanks for the note. We are able to access the documents. Please let me know if you need additional information.
Jim

From: Moore, Carol [mailto:Carol.Moore@dep.state.fl.us]
Sent: Wednesday, November 30, 2011 2:03 PM
To: jsharpe@standardpurification.com
Cc: ken@airtest.fdn.com; Zhang-Torres; Zell, David; Prickett, Patricia
Subject: STANDARD CARBON, LLC; 0830170-005-AC
Importance: High

Attention: Mr. James Sharpe, CEO

Owner/Company Name: STANDARD CARBON, LLC
Facility Name: STANDARD CARBON, LLC
Project Number: 0830170-005-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
Facility County: MARION

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_files/0830170.005.AC.D_pdf.zip

IMPORTANT: We must receive verification, by email, stating that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Dear Mr. Sharpe:

Attached is the official **Written Notice of Intent to Issue Air Permit** for the project referenced above. The Written Notice of Intent to Issue Air Permit (including the Draft Permit and the Attachments) has been posted on the Department of Environmental Protection's Southwest District website.

Click on the link displayed above to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

Permit project documents that are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

The Southwest District is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

For your convenience, I have also attached the Public Notice of Intent to Issue Air Permit in a word document.

If you should have any questions, please contact David Zell, the Permit Engineer at David.Zell@dep.state.fl.us.

Sincerely,

Carol L. Moore
Florida Dept. of Environmental Protection
Southwest District Air Resources
Administrative Assistant
(813) 632-7600, ext. 111
Fax: (813) 632-7668
carol.moore@dep.state.fl.us

Please Note: Florida has a very broad Public Records Law. Most written communications to or from State and Local Officials regarding State or Local business are public records available to the public and media upon request. Your email communications may therefore be subject to public disclosure.

Please take a few minutes to share your comments on the service you received from the department by clicking on this link [DEP Customer Survey](#).

Moore, Carol

From: Moore, Carol
Sent: Wednesday, November 30, 2011 2:03 PM
To: 'jsharpe@standardpurification.com'
Cc: 'ken@airtest.fdn.com'; Zhang-Torres; Zell, David; Prickett, Patricia
Subject: STANDARD CARBON, LLC; 0830170-005-AC
Attachments: 0830170.005.ac.d.Standard Carbon.Intent.doc.pdf; 0830170.005.ac.d.Standard Carbon.Pub Not.doc

Importance: High

Attention: Mr. James Sharpe, CEO

Owner/Company Name: STANDARD CARBON, LLC
Facility Name: STANDARD CARBON, LLC
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If you should have any questions, please contact David Zell, the Permit Engineer at David.Zell@dep.state.fl.us.

Sincerely,

Carol L. Moore
Florida Dept. of Environmental Protection
Southwest District Air Resources
Administrative Assistant
(813) 632-7600, ext. 111
Fax: (813) 632-7668
carol.moore@dep.state.fl.us

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Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Mr. James Sharpe, CEO
Standard Carbon LLC, dba Standard Purification
551 North U.S. Highway 41
Dunnellon, FL 34432

Re: Project No. 0830170-005-AC
Minor Air Construction Permit for Refurbished Carbon Storage Silo No. 4

Dear Mr. Sharpe:

On October 17, 2011, you submitted an air construction permit application requesting authorization for refurbishment and operation of Carbon Storage Silo No. 4 at the existing activated carbon production facility located in Marion County at 551 North Highway 41 in Dunnellon, Florida. Enclosed are the following documents: the Technical Evaluation and Preliminary Determination; the Draft Permit and Appendices; the Written Notice of Intent to Issue Air Permit; and the Public Notice of Intent to Issue Air Permit. The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact the project engineering specialist, David Zell, at david.zell@dep.fl.us or by phone at (813) 632-7600 extension 118.

Sincerely,

A handwritten signature in cursive script that reads "Cindy Zhang-Torres".

Cindy Zhang-Torres, P.E.
Air Permitting Manager
Southwest District

Enclosures

CZT/pp/drz

WRITEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

Standard Carbon LLC, dba Standard Purification
551 North U.S. Highway 41
Dunnellon, FL 34432

Project No. 0830170-005-AC
Minor Air Construction Permit
Marion County, Florida

Authorized Representative:
Mr. James Sharpe, CEO

Construction Permit for Refurbished
Carbon Storage Silo No. 4

Facility Location: Standard Carbon LLC, dba Standard Purification operates the existing activated carbon production facility located in Marion County at 551 North Highway 41 in Dunnellon, Florida.

Project: The applicant proposes to make modifications to the existing facility consisting of the refurbishment and operation of existing, currently not-in-use, Silo No. 4 to store carbon product material. Emissions from transfer of carbon product to Carbon Storage Silo No. 4 will be controlled by existing baghouse particulate matter (PM) emission control device Baghouse PJ-4. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction and operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Department of Environmental Protection's Air Resource Management Section in the Southwest District Office. The Permitting Authority's physical address is: 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926. The Permitting Authority's mailing address is: 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926. The Permitting Authority's telephone number is 813/632-7600.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to

WRITEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts

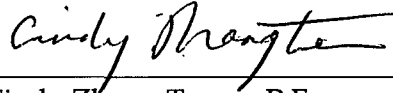
WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Executed in Hillsborough County, Florida.



Cindy Zhang-Torres, P.E.
Air Permitting Manager
Southwest District

CERTIFICATE OF SERVICE

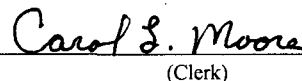
The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 11/30/2011 to the persons listed below.

Mr. Mr. James Sharpe, Standard Carbon LLC
(jsharpe@standardpurification.com)

Mr. Kenneth E. Given, P.E., Air Testing & Consulting, Inc.
(ken@airtest.fdn.com)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.


(Clerk)

11/30/2011
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Air Resource Management, Southwest District Office
Draft Minor Air Construction Permit
Project No. 0830170-005-AC
Standard Carbon LLC, dba Standard Purification
Marion County, Florida

Applicant: The applicant for this project is Standard Caron LLC. The applicant's authorized representative and mailing address is: Mr. James Sharpe, CEO, Standard Carbon LLC, dba Standard Purification, 551 North Highway 41, Dunnellon, Florida, 34432.

Facility Location: Standard Carbon, dba Standard Purification, operates the existing activated carbon production facility, located in Marion County at 551 North Highway 41 in Dunnellon, Florida.

Project: The proposed project is authorization for modifications to the existing facility consisting of the refurbishment and operation of existing, currently not-in-use, Silo No. 4 to store carbon product material. Emissions from transfer of carbon product to Carbon Storage Silo No. 4 will be controlled by an existing baghouse particulate matter (PM) emission control device.

Permitting Authority: Applications for air construction and operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Department of Environmental Protection's Air Resource Management Section in the Southwest District Office. The Permitting Authority's physical address is: 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926. The Permitting Authority's mailing address is: 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926. The Permitting Authority's telephone number is 813/632-7600.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the

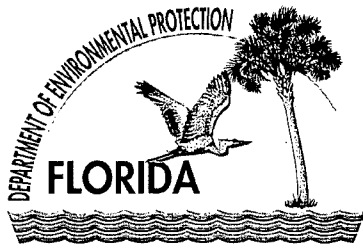
Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.



Florida Department of Environmental Protection

Southwest District
13051 N. Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard, Jr.
Secretary

DRAFT PERMIT

PERMITTEE

Standard Carbon LLC
551 North U.S. Highway 41
Dunnellon, FL 34432

Authorized Representative:
Mr. James Sharpe, CEO

Air Permit No. 0830170-005-AC
Permit Expires: 12/31/2012
Minor Air Construction Permit

Construction Permit for Carbon Storage
Silo No. 4 with Baghouse Emission Control
Device

This is the final air construction permit, which authorizes modifications to this existing activated carbon production facility (Standard Industrial Classification No. 2819). The facility is located in Marion County at 551 North US Highway 41 in Dunnellon, Florida. The UTM coordinates are Zone 17, 360.2 km East, and 3230.0 km North. As noted in the Final Determination provided with the final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final document is organized by the following sections:

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Unit Specific Conditions
- Section 4. Appendices

Because of the technical nature of the project, this document contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this document.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental

Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by

the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

DRAFT

Cindy Zhang-Torres, P.E.
Air Permitting Manager
Southwest District

Effective Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

Mr. James Sharpe, CEO, Standard Carbon LLC
(jsharp@standardpurification.com)

Mr. Kenneth E. Given, P.E., Air Testing & Consulting, Inc.
(ken@airtest.fdn.com)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

(Clerk)

(Date)

SECTION 1. GENERAL INFORMATION (F.A.C.)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This facility produces activated carbon using recovered fly ash as a raw material.

See Operation Permit 0830170-002-AO and Construction Permit 0830170-004-AC for listings of emission units (EUs), detailed facility and emission unit process descriptions, and modifications to the facility authorized by the above construction permit.

Project Description and Affected/Proposed Emission Units

This construction permit authorizes the refurbishment and operation of existing currently not-in-use Silo No. 4 to store carbon product material. Emissions from transfer of carbon product to Carbon Storage Silo No. 4 will be controlled by existing baghouse particulate matter (PM) emission control device Baghouse PJ-4, a Kinetic Air Model 12-RS-84. (*Note - Baghouse PJ-4 was previously the emission control device for EU No. 009 (Carbon Storage Silo Nos. 8, 10, and 12), but was authorized to be removed (and replaced by PJ-2) as part of recently issued construction permit 0830170-004-AC.*)

This project will create the following emissions unit (EU):

EU ID No.	Emission Unit Description	Associated PM Emission Control Device
017	Material Transfer to Carbon Storage Silo No. 4.	Baghouse PJ-4 (Kinetic Air Model 12-RS-84)

Exempt Emission Units/Activities

See Construction Permit 0830170-004-AC

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutant particulate matter (PM).

PERMIT HISTORY/AFFECTED PERMITS

Reference also facility Air Operation Permit 0830170-002-AO and Air Construction Permit No. 0830170-004-AC.

ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Resource Management Section
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority - All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Southwest District Office's Air Resource Management Section (see above mailing address and phone number).
3. Appendices - The following Appendices are attached as part of this document: (add appendices as necessary)
 - a. Appendix A. Citation Formats and Glossary of Common Terms;
 - b. Appendix B. General Conditions;
 - c. Appendix C. Common Conditions; and
 - d. Appendix D. Common Testing Requirements.
4. Applicable Regulations, Forms and Application Procedures - Unless otherwise specified in this document, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions - For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]
6. Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]
8. Application for Non-Title V Air Operation Permit Revision - This permit authorizes modification of the permitted emissions unit and initial operation to determine compliance with Department rules. A Non-Title V air operation permit revision is required for continued operation of the permitted emissions unit. The permittee shall apply for a Non-Title V air operation permit revision at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation of Carbon Storage Silo No. 4. (*Note - see Specific Condition No. A.6. for start of operation notification requirement*). Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Non-Title V air operation permit revision, the applicant shall submit the following:
- a. the appropriate permit application form (*see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: <http://www.dep.state.fl.us/air/>*);
 - b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and
 - c. a copy of the initial visible emissions (VE) compliance test report required by Specific Condition Nos. A.3. and A.8., if not previously submitted.

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU No. 017- Carbon Storage Silo No. 4

This section of the document addresses the following emissions unit (EU) (and associated particulate matter (PM) emission control device). *(See more detailed description below the emissions unit (EU) table.)*

EU ID No.	Emission Unit Description	Associated PM Emission Control Device
017	Material Transfer to Carbon Storage Silo No. 4.	Baghouse PJ-4 (Kinetic Air Model 12-RS-84)

***NOTE** - Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

More Detailed Emission Unit Description

Carbon Storage Silo No. 4 will be used as a blending tank to combine the Carbon Storage Silo Nos. 9 and 11 (EU No. 002) tank super sack powdered activated carbon material with the activated carbon product stored in Carbon Storage Silo Nos. 8, 10 or 12 (EU No. 009). Material blended in Carbon Storage Silo No. 4 can then be transferred to bagging for packaging, back to Carbon Storage Silo Nos. 8, 10, or 12 for storage of the blended product, or to Carbon Storage Silo Nos. 14 or 16 (EU Nos. 010 and 014) for bulk load-out. Carbon Storage Silo No. 4 will not receive Raymond Mill carbon product directly.

Emission from transfer of carbon product to Carbon Storage Silo No. 4 will be controlled by baghouse PM emission control device PJ-4, a Kinetic Air Model 12-RS-84 with a design air flow rate of 600 acfm.

***Material Transport Blowers Note** - All of the blowers used to transport fly ash and activated carbon product have fixed speeds (i.e., material is transported at a fixed rate).*

The following Specific Conditions apply to the above emission unit (EU).

PERFORMANCE RESTRICTIONS

A.1. Permitted Hours of Operation - This emissions unit permitted to operate continuously (i.e., for 8760 hours/year).
[Rule 62-210.200 (Definition of Potential to Emit), F.A.C.; as requested by applicant in construction permit application dated 10/11/11]

EMISSIONS STANDARDS

A.2. Visible Emissions (VE) Limitation For Material Storage Silo - In order to provide reasonable assurance that the material (activated carbon) storage silo baghouse PM emission control device is operating properly in accordance with Section 4. Appendix C, Condition 2. (Circumvention of Control Equipment), the Department establishes a visible emission (VE) limitation not to exceed an opacity of 5% from the baghouse PJ-4 exhaust.
[Rules 62-4.070(3), and 62-210.650, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU No. 017- Carbon Storage Silo No. 4

COMPLIANCE TESTING REQUIREMENTS

A.3. Initial and Annual Visible Emissions (VE) Compliance Tests - Within 45 days of the initial operation of Carbon Storage Silo No. 4 (*see Specific Condition No. A.6.*), the permittee shall conduct the initial visible emissions (VE) compliance test on the exhaust vent for the baghouse control device for this silo to demonstrate compliance with the visible emissions (VE) standards of Specific Condition No. A.2. After the initial compliance testing, the exhaust vent for the baghouse PM emission control device listed shall be tested during each federal fiscal year (October 1st to September 30th). The activities required to be in operation during the compliance testing periods are shown below. Testing of emissions from material transfer operations shall be conducted during material transfer/silo loading conditions that are representative of normal transfer operations¹.

EU ID No.	Baghouse ID	Operations to be conducted during emissions testing ¹
017	PJ-4	Transfer of activated carbon from Carbon Storage Silos 8, 10 or 12, or powdered activated carbon from Flyash/Carbon Storage Silo Nos. 9 or 11 ²

Notes -

¹ *Material Transfer Rate Operations Permitting Note - Based on the fact that the material transfer blowers will operate at fixed speeds, the material transfer rate is assumed to be constant.*

² *Material Transfer Operations Permitting Note - This silo can receive activated carbon from any of the listed carbon storage silos. For compliance testing purposes, it does not matter which of the multiple silos material is being transferred from as long as material is being transferred to Silo No. 4 during the entire test period.*

[Rule 62-297.310, F.A.C.]

A.4. Test Method - Required visible emissions compliance tests shall be performed in accordance with the following reference method.

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources The Method 9 VE compliance tests shall be conducted by a certified observer and be a minimum of 30 minutes in duration. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur

The above method is described in Appendix A of 40 CFR 60 and is adopted by reference in Rule 62-204.800, F.A.C. No other method may be used unless prior written approval is received from the Department.

[Rules 62-204.800, 62-296.320(4)(b)4, 62-297.310(4)(a)(2), 62-297.320, and 62-297.401; and Appendix A of 40 CFR 60]

SECTION 3. MISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU No. 017- Carbon Storage Silo No. 4

- A.5. Compliance Test Requirements - Compliance tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

NOTIFICATION REQUIREMENTS

- A.6. Notification of Start of Operation of Carbon Storage Silo No. 4 - The permittee shall notify the Compliance Authority of the date of start of operation of Carbon Storage Silo No. 4, defined as the first transfer of material to the silo. The written notifications shall be sent within 15 days of the first such transfer operation.
[Rule 62-4.070(3), F.A.C.]

(Permitting Note - See also Specific Condition No. A.3. for initial VE testing requirements for this silo.)

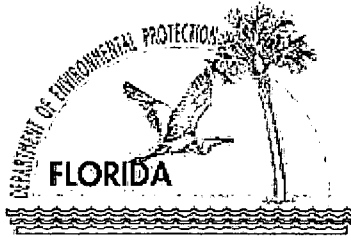
- A.7. Compliance Test Notification - The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required compliance tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

(Permitting Note - The notification should also include the relevant emission unit ID No(s), test method(s) to be used, and pollutants to be tested.)

[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

REPORTS

- A.8. Test Reports - The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. The compliance test reports shall include a statement of the Carbon Storage Silo No. 4 material transfer operations that were being done during the test period, and a statement of whether they represented normal operating conditions and transfer rates.
[Rules 62-4.070(3) and 62-297.310(8), F.A.C.]



**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

APPLICANT

Standard Carbon LLC, dba Standard Purification
551 North U.S. Highway 41, Dunnellon, FL 34432

Facility ID No. 0830170

PROJECT

Project No. 0830170-005-AC
Application for Minor Air Construction Permit for Carbon Storage Silo No. 4

COUNTY

Marion County Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Southwest District Office
Temple Terrace, Florida 33637-7600

November 15, 2011

Prepared by David Zell

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. Project Description:

A. Applicant:

Mr. James Sharpe, CEO
Standard Carbon LLC
551 North U.S. Highway 41
Dunnellon, FL 34432

B. Professional Engineer:

Mr. Kenneth E. Given, P.E.
Air Testing & Consulting, Inc.
333 N. Falkenburg Road, Unit B-214
Tampa, FL 33619

C. Project Location:

This existing activated carbon production facility is located at 551 North Highway 41 in Dunnellon, Marion County.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

D. Project Summary:

The proposed project is the refurbishment and operation of existing, currently not-in-use, Silo No. 4 to store carbon product material. Emissions from transfer of carbon product to Carbon Storage Silo No. 4 will be controlled by existing baghouse particulate matter (PM) emission control device Baghouse PJ-4, a Kinetic Air Model 12-RS-84. (*Note - Baghouse PJ-4 was previously the emission control device for EU No. 009 (Carbon Storage Silo Nos. 8, 10, and 12), but was authorized to be removed (and replaced by PJ-2) as part of recently issued construction permit 0830170-004-AC.*)

Carbon Storage Silo No. 4 will be used as a blending tank to combine the Carbon Storage Silo Nos. 9 and 11 (EU No. 002) tank super sack powdered activated carbon material with the activated carbon product stored in Carbon Storage Silo Nos. 8, 10 or 12 (EU No. 009). Material blended in Carbon Storage Silo No. 4 can then be transferred to bagging for packaging, back to Carbon Storage Silo Nos. 8, 10, or 12 for storage of the blended product, or to Carbon Storage Silo Nos. 14 or 16 (EU Nos. 010 and 014) for bulk load-out. Carbon Storage Silo No. 4 will not receive Raymond Mill carbon product directly.

(*PTE Note - Baghouse PJ-4 controlling emissions from Carbon Storage Silo No. 4 represents an additional emission point (and therefore an additional emissions unit), and an increase in the potential PM emissions from the facility (see Section III).*)

E. Application Information:

Application Received and Complete on: 10/17/11

(*Permit Application Processor Note – An email was sent on 10/21/11 requesting more information on how the proposed new silo will fit into the process. An email response describing the proposed use of the silo was received from the facility contact on 10/24/11, and an email response with an updated process flow diagram was received from their consultant on 11/01/11.*)

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	Y/N	Comments
Rule 62-210.300, F.A.C. - Project Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C.	Y	not exempt from general permitting requirements
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	facility is not a PSD major source
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Material handling operations are a potential source of unconfined particulate matter emissions.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Subject to:	Y/N	Comments
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	N	operation of silo not a source of VOC or odors
Rule 62-296.400, F.A.C. - Stationary Source Emission Standards	N	there is no applicable source category
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Marion County is not an air quality maintenance area for ozone
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	this is a "new" facility, therefore not subject to PM RACT rule
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	there is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS - 40 CFR 61)	N	there is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS - 40 CFR 63)	N	there is no applicable source category
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	facility is a synthetic non-Title V source
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	Y	VE testing is required for the baghouse emission control device (EU No. 017)

III. Summary of Potential to Emit (PTE) from This Project

Pollutant	Affected EU No. and Brief Description of Operation	PTE Prior to Control Device ¹ (TPY)	PTE After Control Device ² (TPY)
PM/PM ₁₀	EU 017 – Material transfer into Carbon Storage Silo No. 4, controlled by baghouse emission control device PJ-4	9.0	0.45 ³

Notes –

¹ Based upon baghouse design air flow rate of 600 cfm and filter bag manufacturer's stated design outlet concentration of 0.008 gr/cf, assumed baghouse control efficiency of 98%, and operation for 8760 hrs/yr.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

² Based upon baghouse design air flow rate of 600 cfm, typical baghouse outlet concentration of 0.02 gr/cf (conservative*), and operation for 8760 hrs/yr. (*Note – Filter bag manufacturer’s stated design outlet concentration is 0.008 gr/cf.)

³ With this project, **Total Facility PM/PM₁₀ PTE** will be:

59.96 TPY (see *Technical Evaluation (TEV) for 0830170-003-AC*) + 0.866 TPY (see *TEV for 0810170-004-AC*) + 0.45 TPY (*this permit*) = **61.28 TPY**.

IV. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

V. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).