

AIR TESTING & CONSULTING

333 FALKENBURG RD. N. B-214 • TAMPA, FLORIDA 33619 • (813)651-0878 • Fax(813)653-9082

October 4, 2011

Cindy Zhang-Torres
Department of Environmental Protection
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

Re: Standard Carbon, LLC
Facility ID: ~~0830011~~ 0830170

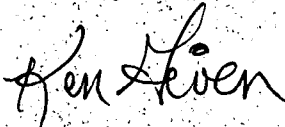
0830170-005-AC

Dear Cindy:

Enclosed are two copies of an application for a non-Title V air construction permit and a check for \$250 to cover the application fee.

If you have any questions please call me at (813) 651-0878.

Sincerely,



Kenneth E. Given, P.E.
President

cc: Kristine Switt, Standard Carbon LLC

**AIR CONSTRUCTION PERMIT
APPLICATION – NON-TITLE V
SOURCE**

Dept. of Environment
Protection

OCT 17 2011

0830170-005-AC Southwest District

PREPARED FOR:

**STANDARD CARBON LLC
DUNNELLON, FLORIDA**

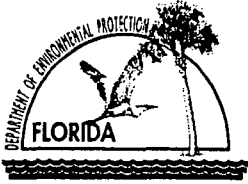
PREPARED BY:

ATC



AIR TESTING & CONSULTING, INC.

**333 FALKENBURG ROAD, SUITE B-214
TAMPA, FLORIDA 33619**



Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - NON-TITLE V SOURCE

See Instructions for Form No. 62-210.900(3)

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: STANDARD CARBON LLC	
2. Site Name: (dba) STANDARD PURIFICATION	
3. Facility Identification Number: 0830170 [] Unknown	
4. Facility Location: Street Address or Other Locator: 551 North U.S. Highway 41, 1 mile south of Romeo City: DUNNELLON County: MARION Zip Code: 34432	
5. Relocatable Facility? [] Yes [X] No	6. Existing Permitted Facility? [X] Yes [] No

Application Contact

1. Name and Title of Application Contact: JAMES SHARPE / CEO	
2. Application Contact Mailing Address: Organization/Firm: STANDARD CARBON LLC Street Address: 551 North U.S. Highway 41 City: DUNNELLON County: MARION Zip Code: 34432	
3. Application Contact Telephone Numbers: Telephone: (917) 583 - 0834 Fax: (561) 624 - 5447	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	10/17/11
2. Permit Number:	0830170-005-AC

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- Initial non-Title V air operation permit for one or more existing, but previously unpermitted, emissions units.
- Initial non-Title V air operation permit for one or more newly constructed or modified emissions units.

Current construction permit number: _____

- Non-Title V air operation permit revision to address one or more newly constructed or modified emissions units.

Current construction permit number: _____

Operation permit number to be revised: _____

- Initial non-Title V air operation permit under Rule 62-210.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source.

Current operation/construction permit number(s):

- Non-Title V air operation permit revision for a synthetic non-Title V source. Give reason for revision; e.g., to address one or more newly constructed or modified emissions units.

Operation permit number to be revised: _____

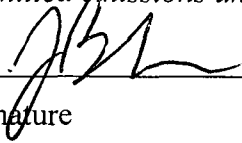
Reason for revision: _____

Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- Air construction permit to construct or modify one or more emissions units.
- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- Air construction permit for one or more existing, but unpermitted, emissions units.

Owner/Authorized Representative

1. Name and Title of Owner/Authorized Representative: James Sharpe / CEO
2. Owner/Authorized Representative Mailing Address: Organization/Firm: Standard Carbon LLC Street Address: 551 North U.S. Highway 41 City: Dunnellon State: Florida Zip Code: 34432
3. Owner/Authorized Representative Telephone Numbers: Telephone: (917) 583 - 0834 Fax: (561) 624 - 5447
4. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative* of the facility addressed in this application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained 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 understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i> Signature  Date <u>10/4/11</u>

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Kenneth E. Given Registration Number: 23023 Authorization Number: 27706
2. Professional Engineer Mailing Address: Organization/Firm: Air Testing & Consulting, Inc. Street Address: 333 N. Falkenburg Rd. Unit B-214 City: Tampa State: Florida Zip Code: 33619
3. Professional Engineer Telephone Numbers: Telephone: (813) 651 - 0878 Fax: (813) 653 - 9082

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature

(seal)

Date

Attach any exception to certification statement.

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through G as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one) <input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent). <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions. <input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.		
2. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Carbon Silo 4 loading and storage with Baghouse PJ-4		
3. Emissions Unit Identification Number: ID:		<input checked="" type="checkbox"/> No ID <input type="checkbox"/> ID Unknown
4. Emissions Unit Status Code: C	5. Initial Startup Date:	6. Emissions Unit Major Group SIC Code: 28
7. Emissions Unit Comment: (Limit to 500 Characters)		

Emissions Unit Control Equipment

1. Control Equipment/Method Description (limit to 200 characters per device or method): PJ-4 – Kinetic-Air model No. 12-RS-84, pulse jet vacuum receiver dust collector 600 cfm (each), bag area = 150 ft ² , air to cloth ratio: 4 to 1
2. Control Device or Method Code(s): 018

Emissions Unit Details

1. Package Unit: Manufacturer:	Model Number:
2. Generator Nameplate Rating:	MW
3. Incinerator Information: Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:	mmBtu/hr
2. Maximum Incineration Rate:	lb/hr tons/day
3. Maximum Process or Throughput Rate:	8 TPH
4. Maximum Production Rate:	
5. Requested Maximum Operating Schedule:	
hours/day	days/week
weeks/year	8,760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):	

B. EMISSION POINT (STACK/VENT) INFORMATION

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram?		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common:			
5. Discharge Type Code: P	6. Stack Height: feet	7. Exit Diameter: feet	
8. Exit Temperature: 77 °F	9. Actual Volumetric Flow Rate: 600 acfm	10. Water Vapor: %	
11. Maximum Dry Standard Flow Rate: dscfm		12. Nonstack Emission Point Height: 10 feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters):			

C. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Receiving of carbon		
2. Source Classification Code (SCC):		3. SCC Units: Tons Handled
4. Maximum Hourly Rate: 8	5. Maximum Annual Rate: 70,080	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

Segment Description and Rate: Segment of

1. Segment Description (Process/Fuel Type) (limit to 500 characters):		
2. Source Classification Code (SCC):		3. SCC Units:
4. Maximum Hourly Rate:	5. Maximum Annual Rate:	6. Estimated Annual Activity Factor:
7. Maximum % Sulfur:	8. Maximum % Ash:	9. Million Btu per SCC Unit:
10. Segment Comment (limit to 200 characters):		

D. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

Potential Emissions

1. Pollutant Emitted: PM		2. Pollutant Regulatory Code: EL	
3. Primary Control Device Code: 018	4. Secondary Control Device Code:	5. Total Percent Efficiency of Control:	
6. Potential Emissions: 0.41 lb/hour 1.8 tons/year		7. Synthetically Limited? []	
8. Emission Factor: 0.008 grs/cf Reference: Supplier of filter bags		9. Emissions Method Code: 0	
10. Calculation of Emissions (limit to 600 characters): PJ-4: E = 600 cfm x 60 min/hr x 0.008 grs/cf x 1 lb/7,000 grs = 0.041 lbs/hr 0.041 lbs/hr x 8,760 hrs/yr x ton/2,000 lbs = 0.18 tons/yr			
11. Pollutant Potential Emissions Comment (limit to 200 characters):			

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Requested Allowable Emissions and Units: lb/hour	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

E. VISIBLE EMISSIONS INFORMATION
(Only Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE05	2. Basis for Allowable Opacity: [X] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: 5 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: DEP Method 9	
2. Visible Emissions Comment (limit to 200 characters): Per 62-297-620(4) – VE of 5% in place of particulate matter test (EPA Method 5)	

F. CONTINUOUS MONITOR INFORMATION
(Only Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	[] Rule [] Other
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

G. EMISSIONS UNIT SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Process Flow Diagram <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment:

Zell, David

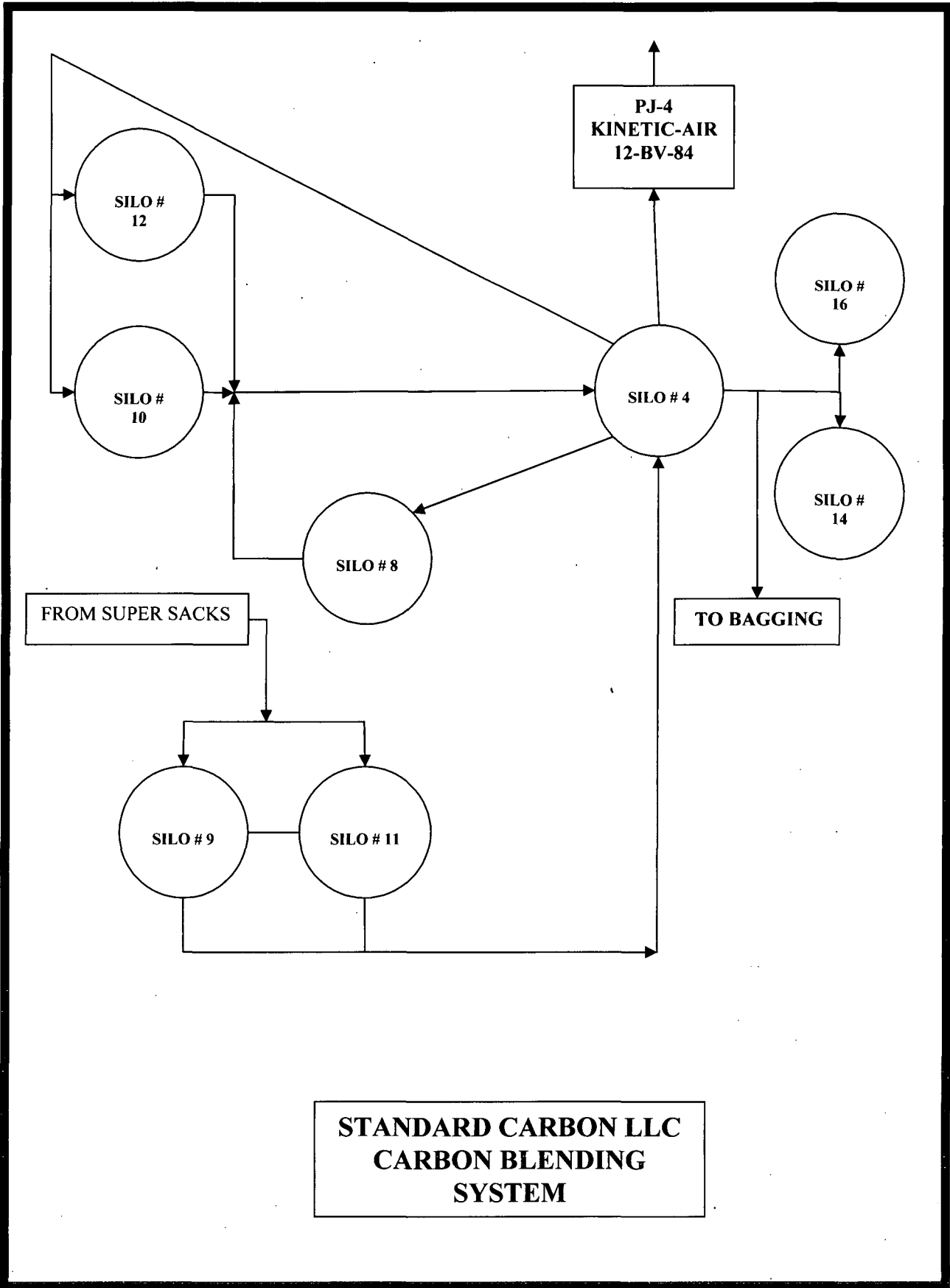
From: ken@airtest.fdn.com
Sent: Tuesday, November 01, 2011 4:14 PM
To: Zell, David
Subject: Standard carbon
Attachments: FLOW1 - Copy.doc

Copy attached. dj

David,

See attached.

Ken



Zell, David

From: Kristine Switt [kswitt@standardpurification.com]
Sent: Monday, October 24, 2011 1:57 PM
To: Zell, David; ken@airtest.fdn.com
Cc: jsharpe@standardpurification.com
Subject: RE: Standard Carbon LLC Air Construction Permit Application for Silo No. 4 (DEP Project 0830170-005-AC)

David,

Ken Given is in the field this week and asked me to respond to your questions. He will forward a new process flow as soon as he returns.

Silo 4 will be used as a blending tank to combine the 9 and 11 tank super sack material with the product stored in 8, 10 or 12, hence the separate EU. Indeed, PJ-4 is the one to be removed under the existing construction permit. Material blended in silo 4 can then be transferred to bagging for packaging, back to silos 8, 10, or 12 for storage of the blended product, or to silos 14 or 16 for bulk load-out using existing EUs. It will not receive Raymond Mill product directly.

If you have any questions, please let us know.

Regards,

Kristine Switt
V.P. of Operations
Standard Purification
O: 352.465.5959
Fax: 352.465.0679
kswitt@standardpurification.com
www.standardpurification.com

From: Zell, David [<mailto:David.Zell@dep.state.fl.us>]
Sent: Friday, October 21, 2011 9:24 AM
To: ken@airtest.fdn.com
Cc: jsharpe@standardpurification.com; Kristine Switt
Subject: Standard Carbon LLC Air Construction Permit Application for Silo No. 4 (DEP Project 0830170-005-AC)

Ken,

We received the above application for Standard Carbon LLC and I was assigned as the processor for the project. In doing a quick review of the application, I noted that the project was described only as "Refurbish Silo 4 for use for carbon storage. Use existing PJ-4 to capture emissions." There is no description of how Silo No. 4 will fit into the process and no process flow diagram was included with the application.

In order to write the permit and describe what is being authorized, I need to know how Silo No. 4 will be used. Where will the carbon going to Silo No. 4 come from and where will the carbon from Silo No. 4 go to? Will it be used like Carbon Storage Silo Nos. 8, 10 and 12 (Emission Unit (EU) No. 009), or like Carbon Storage Silo Nos. 14 and 16 (EU Nos. 010 and 014), or for some other purpose (like to store powdered activated carbon delivered in super-sacks like Fly Ash/carbon Storage Silo Nos. 9 and 11 (EU No. 002))? If possible, I also need an updated process flow diagram for the process area that will include Silo No. 4, showing how it fits into the process flow.