

SWD INTERNAL PERMITTING MEMORANDUM

TO: Robert C. Wong *[Signature]*
District Air Program Administrator

THRU: Cindy Zhang-Torres, P.E. *[Signature]* 8/3/12
Air Permitting Manager

FROM: David Zell *[Signature]*
Air Permitting Engineering Specialist

DATE: 08/03/12

SUBJECT: FINAL Construction Permit Project 0830170-006-AC
Standard Carbon LLC, dba Standard Purification
Modifications at Activated Carbon Production Facility

APPLICATION RECEIPT DATE: 05/21/12

ARMS INVENTORY DATA ENTRY COMPLETION: 07/26/12

The final permit for this project is attached for your approval and signature, which authorizes modifications to the existing activated carbon production facility located in Marion County at 551 North Highway 41 in Dunnellon, Florida. The project results in a minor source air construction permit.

The attached Final Determination summarizes the publication and comment process. There are no pending petitions for administrative hearings or extensions of time in which to file a petition for an administrative hearing. I recommend your approval of the attached final permit for this project.

FINAL DETERMINATION

PERMITTEE

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

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637-7600

PROJECT

Air Permit No. 0830170-006-AC
Minor Air Construction Permit for modifications to the existing Standard Purification facility.

NOTICE AND PUBLICATION

The Permitting Authority distributed a draft minor air construction permit package on July 9, 2012. The applicant published the Public Notice in the Ocala Star Banner on July 19, 2012. The Permitting Authority received the proof of publication on July 27, 2012. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

COMMENTS

No comments on the draft permit were received from the public or the applicant.

CONCLUSION

No changes were made to the draft permit. The permitting authority hereby issues the FINAL Permit with no changes.



Standard Purification
551 N.US Hwy 41
Dunnellon, FL 34432
Phone: 352.465.5959
Toll-free: 888.616.5959
Fax: 352.465.0679

July 24, 2012

Dept. Of Environmental Protection

JUL 27 2012

Southwest District

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

Re: **Standard Carbon, LLC**
Facility ID: 0830011

Dear Cindy,

Enclosed is the Affidavit of Publication for the Public Notice of Intent to Issue Air Permit published July 19, 2012.

If you have any questions please call me at (352) 465-5959.

Sincerely,

A handwritten signature in black ink, appearing to read "James Sharpe".

James Sharpe
CEO

CC: Kenneth E. Given, P.E.

1562

AFFIDAVIT OF PUBLICATION

Star-Banner
Published – Daily
Ocala, Marion County, Florida

STATE OF FLORIDA
COUNTY OF MARION

Before the undersigned, a Notary Public of Said County and State, Laurel Mathis who on oath says that they are an authorized employee of the Star-Banner, a daily newspaper published at Ocala, in Marion County, Florida; that the attached copy of advertisement, being a notice in the matter of

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. 0830170-006-AC Standard Carbon LLC, dba Standard Purification M

was published in said newspaper in the issues of:

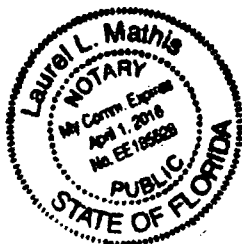
7/19 1x

Affiant further says that the said STAR-BANNER is a daily newspaper published at Ocala, in said Marion County, Florida, and that the said newspaper has heretofore been continuously published in said Marion County, Florida, daily, and has been entered as second class mail matter at the post office in Ocala in said Marion County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the person of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this 19th day of July, A.D., 20 12

Laurel L. Mathis
Notary Public
LAUREL L. MATHIS

(Print, Type or Stamp Name of Notary Public)



Ad #: A000752010

2062

Draft Minor Air Construction Permit
 Project No. 0830170-006-AC
 Standard Carbon LLC
 dba Standard Purification
 Marion County, Florida

Applicant: The applicant for this project is Standard Carbon 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 consists of the addition of a new (or refurbished) kiln with a natural gas fired combustion chamber, with emissions controlled by a new cyclone separator and baghouse; addition of a 2nd Raymond Mill including a new receiving hopper, a new outlet hopper, and two new baghouse emission control devices; addition of a transfer piping system and associated new baghouse emission control device to allow for separate transfer of material from Raymond Mill No. 2 outlet hopper to the carbon product storage silos; addition of two new inlet baghouse fines hoppers; addition of a new classifier on the top of the existing Raymond Mill; addition of a new Silo No. 18 and refurbishment and operation of existing Silo Nos. 1, 2, 3, and 6 for carbon storage; and addition of a 2nd carbon product bagging unit. The project also includes other modifications, which are exempt from air construction permitting because they will not result in new emission sources or an increase in potential emissions from an existing emissions unit. Potential emissions from these modifications are 35.3 tons/year of particulate matter (PM) from the material handling operations, and 7.9 tons/year of nitrogen oxides (NOx) and 6.7 tons/year of carbon monoxide (CO) from combustion of natural gas in the new kiln's combustion chamber.

Also as part of this project the facility production recordkeeping requirements are being revised to only require monthly records of total product shipped and not separate records of product shipped by rail, bulk truck and bagged product.

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 a 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.
 July 18, 2012.
 #A000752010

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
 Air Resource Management
 Southwest District Office

Zell, David

From: Zell, David
Sent: Monday, July 23, 2012 9:09 AM
To: 'Kristine Switt'; 'Jim Sharpe'
Cc: 'Ken@airtest.fdn.com'
Subject: RE: STANDARD CARBON, LLC; Air Construction Permit Project 0830170-006-AC

Kristine,

Thank you for the update.

Assuming that there are no public comments or requests for a public hearing, we will process the construction permit for final issuance after the 14-day public notice period ends on Thursday August 2, 2012. I will let you know if any issues come up that change this schedule.

David

From: Kristine Switt [mailto:kswitt@standardpurification.com]
Sent: Monday, July 23, 2012 8:36 AM
To: Zell, David; 'Jim Sharpe'
Cc: Ken@airtest.fdn.com
Subject: RE: STANDARD CARBON, LLC; Air Construction Permit Project 0830170-006-AC

Good morning, David,

We just received the affidavit of publication in the mail. The public notice was published July 19th. We will submit the proof of publication to FDEP this week.

Thanks for the reminder,

Kristine Switt
352.465.5959

From: Zell, David [mailto:David.Zell@dep.state.fl.us]
Sent: Monday, July 23, 2012 8:06 AM
To: 'Jim Sharpe'
Cc: Ken@airtest.fdn.com; Kristine Switt (kswitt@standardpurification.com)
Subject: RE: STANDARD CARBON, LLC; Air Construction Permit Project 0830170-006-AC

Mr. Sharpe,

I just wanted to check on the status of publication of the public notice for this project. As described in the Written Notice of Intent to Issue, you must send us the proof of publication from the newspaper (electronic or hard copy) once the notice is published.

Thank you for your attention to this. Please let me know if you have any questions.

David

David Zell
FDEP SW District (Tampa)
Air Permit Engineering Specialist

PHONE: 813-632-7600 extension 118

Zell, David

From: Zell, David
Sent: Monday, July 23, 2012 8:06 AM
To: 'Jim Sharpe'
Cc: Ken@airtest.fdn.com; Kristine Switt (kswitt@standardpurification.com)
Subject: RE: STANDARD CARBON, LLC; Air Construction Permit Project 0830170-006-AC

Mr. Sharpe,

I just wanted to check on the status of publication of the public notice for this project. As described in the Written Notice of Intent to Issue, you must send us the proof of publication from the newspaper (electronic or hard copy) once the notice is published.

Thank you for your attention to this. Please let me know if you have any questions.

David

David Zell
FDEP SW District (Tampa)
Air Permit Engineering Specialist

PHONE: 813-632-7600 extension 118

From: Jim Sharpe [<mailto:jsharpe@standardpurification.com>]
Sent: Monday, July 09, 2012 10:52 AM
To: Moore, Carol
Cc: Ken@airtest.fdn.com; Zhang-Torres; Zell, David
Subject: RE: STANDARD CARBON, LLC; 0830170-006-AC

Carol,

Thanks for the note. We are able to access the documents.

Regards,
Jim

Jim Sharpe
Chief Executive Officer
Standard Purification
551 N US HWY 41
Dunnellon FL 34432
352.465.5959 (o)
917.583.0834 (c)
jsharpe@standardpurification.com
www.standardpurification.com

From: Moore, Carol [<mailto:Carol.Moore@dep.state.fl.us>]
Sent: Monday, July 09, 2012 10:34 AM
To: jsharpe@standardpurification.com
Cc: Ken@airtest.fdn.com; Zhang-Torres; Zell, David
Subject: STANDARD CARBON, LLC; 0830170-006-AC
Importance: High

Attention: Mr. James Sharpe, CEO

SWD INTERNAL PERMITTING MEMORANDUM

TO: Robert C. Wong
District Air Program Administrator

THRU: Cindy Zhang-Torres, P.E. *CJ*
Air Permitting Manager

FROM: David Zell *DZ*
Air Permitting Engineering Specialist

DATE: 06/26/12 (*Updated 07/03/12 and 07/05/12 - see 2nd to last paragraph*)

SUBJECT: Draft Construction Permit Project 0830170-006-AC
Standard Carbon LLC, dba Standard Purification
Modifications at Activated Carbon Production Facility

DAY 90: 08/19/12

On 05/21/12, an application for a construction permit for modifications to the existing activated carbon production facility was received from Standard Carbon LLC. The modifications consist of addition of a third kiln (Kiln No. 3), addition of a second Raymond Mill (Raymond Mill No. 2), refurbishment and operation of four (4) additional existing (but currently unpermitted) carbon storage silos, and miscellaneous other minor modifications (*See Draft permit or Technical Evaluation for more details on this project.*)

On 06/05/12, I visited site with the assigned compliance inspector, Nedin Bahtic, to review the application with the facility manager and verify the operating status of modifications permitted on previous construction permits (*see Note below*). As a result of the discussions a change will be made to the production records requirement (see Common Conditions) to no longer require separate records for carbon product loaded out to trucks, railcars or bagged in the Bagging Unit. (The plant does keep separate records of each of these, but the main plant summary records only show total carbon product shipped, which is what the permit has a limit on. In view of this, there is no need or purpose for us to have a permit requirement for separate totals for the various methods of shipment.) It also became apparent that the plant uses different baghouse control device ID references than those we use in the permit (we got our PJ# reference ID's from what was shown in the previous permit applications (including spreadsheets and process flow diagrams). The plant manager has a cross reference chart to translate our references to theirs whenever they are applying the permit requirements or doing VE testing. I suggested that they provide us with the necessary plant baghouse identifications and request that the baghouse references in operation permit be converted to the ones they use. They will do this as part of their operation permit revision application to be submitted soon (*see Note below*).

Also based on discussions with the plant manager during the site visit regarding the capital funding, equipment procurement, and possible schedules for the various modifications, the construction permit expiration date was set at 12/ 31/2014 to allow sufficient time for funding, equipment procurement, construction, testing, and submittal of an operation permit revision application.

Review of the application attachments during the process of preparing the technical evaluation revealed several missing new emissions sources on the Particulate Matter Emissions spreadsheet attached to the application. On 06/19/12, I emailed the consultant to inform him of this. He called to discuss this, and later on 06/19/12, emailed me a corrected PM emissions spreadsheet.

This construction permit was organized and written using the template of construction permit 0830170-004-AC for consistency and to make eventual incorporation into the facility operation permit easier. (*Note - An application for an operation permit revision to incorporate Construction Permits 0830170-004-AC and 0830170-005-AC is expected to be submitted soon by Standard Carbon. The revised operation permit will also be based on the organization of Construction Permit 0830170-004-AC.*)

A pre-draft of the permit was emailed to Standard Carbon and their consultant for review on 06/26/12. Standard Carbon responded by email on 07/02/12 stating that the pre-draft permit was fine but asking if it was too late to include a brand new product storage silo to the project. After discussing this with Cindy Zhang-Torres, I responded that given that the silo would be used just like and as part of the four silos to be refurbished and would not result in an additional emission unit or emission control device, we could add it if they would make a more formal request (by email) and give us a few more details of the proposed new silo. This request was received on 07/03/12, and the permit and associated documents were revised to include the new storage silo (Silo No. 18) as part of the project. On 07/05/12 an email was sent to Standard Carbon to clarify a question about the use of Silo No. 4 raised by a statement in the 07/03/12 email response. A reply was received later on 07/05/12. (*See permit files for copies of email correspondence.*)

I recommend that this Intent to Issue and draft construction permit be sent out as attached and submit it for your review and approval.

Zell, David

From: Kristine Switt [kswitt@standardpurification.com]
Sent: Thursday, July 05, 2012 3:02 PM
To: Zell, David
Cc: 'Jim Sharpe'; ken@airtest.fdn.com
Subject: RE: Silo No. 4 Clarification - RE: Add a new silo to draft construction permit

006-AC

David,

No. 4 was in the pre-draft in that paragraph and I didn't catch it. No. 4 will utilize DC-5 when receiving sand from the shaker screen or RM classifier, or during blending operations, as permitted. It could be used as a regular storage silo using BV 5 or DC-2, as described, but is intended to be special use.

Let me know if there is anything else.

Kristine Switt
352.465.5959

From: Zell, David [mailto:David.Zell@dep.state.fl.us]
Sent: Thursday, July 05, 2012 9:52 AM
To: 'Kristine Switt'
Cc: 'Jim Sharpe'; ken@airtest.fdn.com
Subject: Silo No. 4 Clarification - RE: Add a new silo to draft construction permit

Kristine,

As I read your request below and was revising the Draft permit, I realized that I am not sure that I understand how Silo No. 4 is loaded and which baghouse will be used to control emissions from it.

Construction Permit 0830170-005-AC was issued for the refurbishment and operation of Carbon Storage Silo No. 4 with emissions to be controlled by Baghouse PJ-4 (your Baghouse ID DC-5). This baghouse is dedicated to Silo No. 4 only. This is separate from Baghouse PJ-2 (your Baghouse BV-5) or the new Raymond Mill No. 2 baghouse which will be used for carbon transfer to Silo Nos. 1, 2, 3, 8, 9, 10, 11, 12, and now new Silo No. 18, from Mill No. 1 (BV-5) or Mill No. 2 (new Mill 2 baghouse).

Your request below lumps Silo No. 4 in with the other silos (see **green highlighted** reference blow) and does not mention Baghouse DC-5 (see **yellow highlighted** section below). Please clarify for me what baghouse will be used when loading Silo No. 4. (For example, when carbon from Mill No. 1 or Mill No. 2 is transferred to Silo No. 4 will BV-5 or the new Mill 2 baghouse be used, or DC-5 (Silo No. 4 baghouse) ?).

Thanks for your help clearing this up for me.

David

David Zell
FDEP SW District (Tampa)
Air Permit Engineering Specialist

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](#).

From: Kristine Switt [mailto:kswitt@standardpurification.com]
Sent: Tuesday, July 03, 2012 10:00 AM
To: Zell, David

Zell, David

From: Zell, David
Sent: Thursday, July 05, 2012 9:52 AM
To: 'Kristine Switt'
Cc: 'Jim Sharpe'; ken@airtest.fdn.com
Subject: Silo No. 4 Clarification - RE: Add a new silo to draft construction permit

Kristine,

As I read your request below and was revising the Draft permit, I realized that I am not sure that I understand how Silo No. 4 is loaded and which baghouse will be used to control emissions from it.

Construction Permit 0830170-005-AC was issued for the refurbishment and operation of Carbon Storage Silo No. 4 with emissions to be controlled by Baghouse PJ-4 (your Baghouse ID DC-5). This baghouse is dedicated to Silo No. 4 only. This is separate from Baghouse PJ-2 (your Baghouse BV-5) or the new Raymond Mill No. 2 baghouse which will be used for carbon transfer to Silo Nos. 1, 2, 3, 8, 9, 10, 11, 12, and now new Silo No. 18, from Mill No. 1 (BV-5) or Mill No. 2 (new Mill 2 baghouse).

Your request below lumps Silo No. 4 in with the other silos (see **green highlighted** reference blow) and does not mention Baghouse DC-5 (see **yellow highlighted** section below). Please clarify for me what baghouse will be used when loading Silo No. 4. (For example, when carbon from Mill No. 1 or Mill No. 2 is transferred to Silo No. 4 will BV-5 or the new Mill 2 baghouse be used, or DC-5 (Silo No. 4 baghouse) ?).

Thanks for your help clearing this up for me.

David

David Zell
FDEP SW District (Tampa)
Air Permit Engineering Specialist

From: Kristine Switt [<mailto:kswitt@standardpurification.com>]
Sent: Tuesday, July 03, 2012 10:00 AM
To: Zell, David
Cc: 'Jim Sharpe'; ken@airtest.fdn.com
Subject: Add a new silo to draft construction permit

David,

Thank you for this consideration:

In addition to refurbishment and operation of existing Silo Nos. 1, 2, 3, and 6 for carbon storage, add a new silo (#18). All silos (the above additional refurbished silos, the new silo, plus permitted Silo Nos. 4, 8, 9, 10, 11, and 12) would be piped so that they could receive carbon from multiple sources-either Raymond Mill No. 1 or No. 2, supersack dumping, tank truck discharge or railcar discharge. Only one silo would be loaded at any one time so no new baghouse will be required. **Either BV-5 or DC2, or the new mill No. 2 baghouse will be utilized.**

The new silo would be located north of silo No. 3 and east of silos No. 9 and 11.

Let me know if this description is adequate.

Kristine Switt
V.P. of Operations
Standard Purification

Zell, David

From: Jim Sharpe [jsharpe@standardpurification.com]
Sent: Tuesday, July 03, 2012 10:21 AM
To: 'Kristine Switt'; Zell, David
Cc: ken@airtest.fdn.com
Subject: RE: Add a new silo to draft construction permit

Kristine,

Thank you for the note.

David,

We appreciate your help! I approve of Kristine's request.

Regards,
Jim

Jim Sharpe
Chief Executive Officer
Standard Purification
O: 352.465.5959
C: 917.583.0834
jsharpe@standardpurification.com
www.standardpurification.com

From: Kristine Switt [<mailto:kswitt@standardpurification.com>]
Sent: Tuesday, July 03, 2012 10:00 AM
To: 'Zell, David'
Cc: 'Jim Sharpe'; ken@airtest.fdn.com
Subject: Add a new silo to draft construction permit

David,

Thank you for this consideration:

In addition to refurbishment and operation of existing Silo Nos. 1, 2, 3, and 6 for carbon storage, add a new silo (#18). All silos (the above additional refurbished silos, the new silo, plus permitted Silo Nos. 4, 8, 9, 10, 11, and 12) would be piped so that they could receive carbon from multiple sources-either Raymond Mill No. 1 or No. 2, supersack dumping, tank truck discharge or railcar discharge. Only one silo would be loaded at any one time so no new baghouse will be required. Either BV-5 or DC2, or the new mill No. 2 baghouse will be utilized.

The new silo would be located north of silo No. 3 and east of silos No. 9 and 11.

Let me know if this description is adequate.

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

Zell, David

From: Kristine Switt [kswitt@standardpurification.com]
Sent: Tuesday, July 03, 2012 10:00 AM
To: Zell, David
Cc: 'Jim Sharpe'; ken@airtest.fdn.com
Subject: Add a new silo to draft construction permit

David,

Thank you for this consideration:

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The new silo would be located north of silo No. 3 and east of silos No. 9 and 11.

Let me know if this description is adequate.

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

Zell, David

From: Zell, David
Sent: Monday, July 02, 2012 5:38 PM
To: 'Kristine Switt'
Cc: 'Jim Sharpe'; ken@airtest.fdn.com
Subject: RE: Standard Carbon LLC - Pre-Draft of Air Construction Permit for Review and Comment (DEP Project 0830170-006-AC)

Kristine,

I just discussed this with the Air Permitting Manager (Cindy Zhang-Torres). It is unusual to add something at this late stage, but after I explained it to her she said we could add it as long as it is not an additional separate emissions unit with its own separate baghouse and exhaust. Based on your short description in your email that is not the case.

Since this new silo was not part of the permit application, we just need you to make a more formal request to add the new silo in a separate email so that we have that to print out to add to the application file. In that email you should describe that it will be a brand new silo, how it will be used (what material(s) will it store and transferred from where), and how silo loading emissions will be controlled (if I understood your email correctly, you should state that it will be used exactly (?) like refurbished Silos 1, 2, 3, and 6, with emissions controlled by the same existing silo loading baghouse (and the new Raymond Mill No. 2 outlet hopper to storage silos baghouse). Please also tell us what the assigned Silo ID number will be and approximately where it would be located in relation to other silos/equipment (it will also need to be added eventually to the facility plot plan and appropriate process flow diagram)..

This email doesn't need to be long – just a more formal specific request from you with a name block at the bottom showing your name and title and the company name, and with a copy to Mr. Sharpe (who signed the original application) to verify that he is aware of the request.

Please let me know if you have any questions. I will be holding further processing of the Draft permit until I hear back from you, so please let me know if you change your mind and don't want to add this new silo to the construction permit.

David

David Zell
FDEP SW District (Tampa)
Air Permit Engineering Specialist

PHONE: 813-632-7600 extension 118

From: Kristine Switt [<mailto:kswitt@standardpurification.com>]
Sent: Monday, July 02, 2012 4:44 PM
To: Zell, David
Cc: 'Jim Sharpe'; ken@airtest.fdn.com
Subject: RE: Standard Carbon LLC - Pre-Draft of Air Construction Permit for Review and Comment (DEP Project 0830170-006-AC)

David,

I went through the pre-draft permit and it seems fine.

Is it too late to include the possible addition of a brand new storage silo to the tank farm in addition to the refurbishment of 1, 2, 3, and 6? It would function like all the other storage units and would not add an EU.

Thanks,

Kristine Switt

Zell, David

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Thanks,

Kristine Switt
352.465.5959

From: Zell, David [mailto:David.Zell@dep.state.fl.us]
Sent: Tuesday, June 26, 2012 5:42 PM
To: jsharpe@standardpurification.com; kswitt@standardpurification.com
Cc: ken@airtest.fdn.com
Subject: Standard Carbon LLC - Pre-Draft of Air Construction Permit for Review and Comment (DEP Project 0830170-006-AC)

Attached for your review and comment, please find a preliminary pre-draft of the air construction permit for the modifications requested in the Standard Carbon LLC air permit application submitted on May 21, 2012. This pre-draft permit is being provided to give you the opportunity to review it prior to the official issuance of the DRAFT permit (and subsequent public notice period upon your arranging for publication of a public notice). In particular, we are requesting that you review the permit to insure that it correctly reflects the modifications requested in the application and accurately describes the facility equipments and operations. You are also provided the opportunity to comment on any of the proposed conditions in the permit.

The Department is committed to processing construction permit applications as expeditiously as possible, so we are requesting that you respond back with any comments or corrections no later than Tuesday July 3, 2012. In order to expedite the processing, I will also be routing the pre-draft permit to the Air Permit Manager, Cindy Zhang-Torres, for her review. This may also result in some changes to the DRAFT permit.

Please let me know if you have any difficulty accessing the pre-draft permit document, or have any questions.

Thank you for your attention to this.

David

David Zell
FDEP SW District (Tampa)
Air Permit Engineering Specialist

PHONE: 813-632-7600 extension 118

Zell, David

From: Zell, David
Sent: Tuesday, June 26, 2012 5:42 PM
To: James Sharpe (jsharpe@standardpurification.com); Kristine Switt (kswitt@standardpurification.com)
Cc: Ken Given (ken@airtest.fdn.com)
Subject: Standard Carbon LLC - Pre-Draft of Air Construction Permit for Review and Comment (DEP Project 0830170-006-AC)
Attachments: 0830170.006.ac.d.Standard Carbon.PRE-DRAFT.doc

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David

David Zell
FDEP SW District (Tampa)
Air Permit Engineering Specialist

PHONE: 813-632-7600 extension 118

Zell, David

From: Zell, David
Sent: Tuesday, June 19, 2012 12:45 PM
To: Ken Given (ken@airtest.fdn.com)
Subject: Standard Carbon Air Construction Permit Application Project No. 0830170-006-AC - PM Emissions

Ken,

In preparing my technical evaluation for this project and reviewing the PM emissions increases associated with the requested modifications, I think I identified several things missing from the Particulate Matter Emissions spreadsheet attached to the application. They are:

1. PM emissions from the new baghouse to be added to control emissions from the new Raymond Mill No. 2 receiving hopper. **(Note - This will be new EU No. 020.)** See application Emissions Unit Information Section 4 of 6, beginning page 32 of the application. (It should also be noted that on page 36, the PM emissions should be calculated based on the 0.03 gr/dscf emission factor (as shown in Box 8.) rather than the 0.008 gr/dscf used in Box. 10. (with results shown in Box 6.). This results in potential PM emissions of 0.154 lb/hr and 0.68 TPY.
2. PM emissions from the new baghouse to be added for the transfer of carbon from new Raymond Mill (RM) No. 2 outlet hopper to the carbon silos (so ground carbon from RM No. 2 can be isolated from that from RM No. 1). **(Note - This will be new EU No. 022.)** See application Emissions Unit Information Section 5 of 6, beginning page 39 of the application. (It should also be noted that on page 43, the PM emissions should be calculated based on the 0.03 gr/dscf emission factor (as shown in Box 8.) rather than the 0.008 gr/dscf used in Box. 10. (with results shown in Box 6.). This results in potential PM emissions of 0.26 lb/hr and 1.13 TPY.

Please review the spreadsheet to verify if these are missing or not, and if so, please add them and email me the revised spreadsheet.

Please let me know if you have any questions.

Thanks,

Dave

David Zell
FDEP SW District (Tampa)
Air Permit Engineering Specialist

PHONE: 813-632-7600 extension 118

Zell, David

From: Zell, David
Sent: Thursday, May 24, 2012 2:29 PM
To: Bahtic, Nedin
Cc: Flavors, Brandy; Zhang-Torres
Subject: Construction Permit Application for Standard Carbon, LLC (Project 0830170-006-AC)

Nedin,

The permitting section has received a new application from Standard Carbon, LLC. The application is for multiple (many) modifications to the facility equipment/operations and facility permit. The project number is 0830170-006-AC-AO. If you have any questions or comments, please contact the assigned permit engineering specialist David Zell.

David Zell
FDEP SW District (Tampa)
Air Permit Engineering Specialist

PHONE: 813-632-7600 extension 118

Zell, David

From: JSharpe@standgen.com
Sent: Tuesday, May 22, 2012 1:48 PM
To: Zell, David; jsharpe@standardpurification.com
Cc: Kristine Switt; ken@airtest.fdn.com
Subject: RE: Air Construction Permit Application for Standard Carbon LLC (DEP Project 0830170-006-AC)

David,

Thank you for the update.

Jim

Jim Sharpe

Standard General

650 Madison Ave. 23rd

New York 10065

t| 212. 307.2513

jsharpe@standgen.com

From: Zell, David [David.Zell@dep.state.fl.us]
Sent: Tuesday, May 22, 2012 12:21 PM
To: jsharpe@standardpurification.com
Cc: Kristine Switt; ken@airtest.fdn.com
Subject: Air Construction Permit Application for Standard Carbon LLC (DEP Project 0830170-006-AC)

Mr. Sharpe,

This is to inform you that on 05/21/12, we received your application for an air construction permit for modifications to your Dunnellon facility. I have been assigned as the project engineering specialist responsible for processing your application. The application has been assigned DEP Project No. 0830170-006-AC.

Please contact me (email is best) if you have any questions concerning the processing of your application.

David Zell

FDEP SW District (Tampa)

Air Permit Engineering Specialist

PHONE: 813-632-7600 extension 118

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](#).

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Zell, David

From: Zell, David
Sent: Tuesday, May 22, 2012 12:22 PM
To: James Sharpe (jsharp@standardpurification.com)
Cc: Kristine Switt; ken@airtest.fdn.com
Subject: Air Construction Permit Application for Standard Carbon LLC (DEP Project 0830170-006-AC)

Mr. Sharpe,

This is to inform you that on 05/21/12, we received your application for an air construction permit for modifications to your Dunnellon facility. I have been assigned as the project engineering specialist responsible for processing your application. The application has been assigned DEP Project No. 0830170-006-AC.

Please contact me (email is best) if you have any questions concerning the processing of your application.

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