

SWD INTERNAL PERMITTING MEMORANDUM

TO: Robert C. Wong *RCW 8/30*
District Air Program Administrator

THRU: Cindy Zhang-Torres, P.E. *CJT 8/28/12*
Air Permitting Manager

FROM: David Zell *DZ*
Air Permitting Engineering Specialist

DATE: 08/23/12

SUBJECT: FINAL Operation Permit Project 0830170-007-AO
Standard Carbon LLC, dba Standard Purification
Operation Permit Revision to Incorporate Construction Permits 0830170-004-AC
and 005-AC

APPLICATION RECEIPT DATE: 07/02/12

ARMS INVENTORY DATA ENTRY COMPLETION: 08/23/12

On 07/02/12 Standard Carbon LLC submitted an application for an operation permit revision for the existing activated carbon production facility located in Marion County at 551 North Highway 41 in Dunnellon, Florida. The purpose of the operation permit revision was to incorporate the modifications permitted in Construction Permits 0830170-004-AC (for miscellaneous equipment changes and additions) and 0830170-005-AC (for refurbishment of an existing previously-not-permitted carbon storage silo (Silo No. 4) and associated baghouse).

At the request of the permittee as part of the operation permit revision application, the existing baghouse ID's have been changed from those shown in previous permits (and as shown in previous permit applications) to those more commonly in use by the facility personnel. The revised facility reference baghouse ID's are now shown in the permit (with the baghouse ID previously used in the permit shown italicized in parenthesis in the Existing Facility EU table on pages 4 and 5 of the permit.)

Initial VE compliance tests on the modified equipment and relocated or refurbished baghouse emission control devices required by Construction Permits 004-AC and 005-AC were conducted on 11/29/11 and 04/27/12, and showed compliance with the permit limitations.

A draft of this permit was emailed to the applicant and their consultant for review and comment on 08/20/12 (originally sent on 08/15/12, but accidentally attached the existing operation permit instead of a draft of the operation permit revision). A response was received on 08/22/12, with a request for a correction to be made to one condition (Condition A.6.) (*see file for copies of email correspondence*). The correction was made to Condition A.6., and also to associated Condition Nos. A.4. and A.5.b., which were also affected.

I recommend that this operation permit be issued as drafted and submit it for your review and signature.

Zell, David

From: Zell, David
Sent: Thursday, August 23, 2012 12:49 PM
To: 'Kristine Switt'
Cc: ken@airtest.fdn.com; 'Jim Sharpe'
Subject: RE: CORRECTED ATTACHMENT FOR Draft Air Operation Permit Revision For Review and Comment - Standard Carbon Project 0830170-007-AO

Kristine,

FYI - While making the correction to Specific Condition No. A.6. (including correcting the reference to Specific Condition No. A.4 (from No. A.3) in the Permitting Note below the condition), I noted that associated Specific Condition No. A.4. also needed to be revised to remove references to bagged activated carbon unloading. I also revised the wording in Specific Condition No. A.5.b. to clarify it.

David

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

From: Kristine Switt [mailto:kswitt@stanardpurification.com]
Sent: Thursday, August 23, 2012 10:36 AM
To: Zell, David
Cc: ken@airtest.fdn.com; 'Jim Sharpe'
Subject: RE: CORRECTED ATTACHMENT FOR Draft Air Operation Permit Revision For Review and Comment - Standard Carbon Project 0830170-007-AO

Thanks,

Kristine Switt
352.465.5959

From: Zell, David [mailto:David.Zell@dep.state.fl.us]
Sent: Thursday, August 23, 2012 10:33 AM
To: 'Kristine Switt'
Cc: ken@airtest.fdn.com
Subject: RE: CORRECTED ATTACHMENT FOR Draft Air Operation Permit Revision For Review and Comment - Standard Carbon Project 0830170-007-AO

Kristine,

Thank you for your comment catching this oversight. The references in Specific Condition No. A.6. to processing bagged powdered activated carbon came from the original construction permit adding this activity and should have been removed when the condition was incorporated into the operation permit. I have now done this, and also added words to clarify that the remaining condition applies only to processing bulk dry flyash raw material.

I will now forward the operation permit revision to my supervisor for review, signature, and issuance.

Thanks.

David

Zell, David

From: Zell, David
Sent: Thursday, August 23, 2012 10:33 AM
To: 'Kristine Switt'
Cc: ken@airtest.fdn.com
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David

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

From: Kristine Switt [<mailto:kswitt@standardpurification.com>]
Sent: Wednesday, August 22, 2012 5:11 PM
To: Zell, David
Cc: ken@airtest.fdn.com
Subject: RE: CORRECTED ATTACHMENT FOR Draft Air Operation Permit Revision For Review and Comment - Standard Carbon Project 0830170-007-AO

David,

Thanks for the opportunity to review this.

In paragraph A.6., (EU No. 001 and 002)-although we have not used this equipment to transfer dry fly ash, we are using the equipment to unload bagged activated carbon (notice was given and VE tests completed). The paragraph would seem to suggest neither use had begun yet.

Kristine Switt
352.465.5959

From: Zell, David [<mailto:David.Zell@dep.state.fl.us>]
Sent: Monday, August 20, 2012 1:10 PM
To: Zell, David; jsharpe@standardpurification.com; kswitt@standardpurification.com
Cc: ken@airtest.fdn.com; Zhang-Torres
Subject: RE: CORRECTED ATTACHMENT FOR Draft Air Operation Permit Revision For Review and Comment - Standard Carbon Project 0830170-007-AO

In my rush to get the draft permit out before I left for the week last Tuesday, I accidentally attached the permit. The one I attached was the current operation permit (0830170-002-AO). The one I should have attached is the draft for the operation permit revision (Project 0830170-007-AO), which is attached to this email.

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Please get back to me with any comments by the end of this week, Friday, 08/24/12, if possible.

Sorry for the mix-up. Please let me know if you have any questions.

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: Zell, David
Sent: Tuesday, August 14, 2012 4:29 PM
To: James Sharpe (jsharpe@standardpurification.com); Kristine Switt (kswitt@standardpurification.com)
Cc: Ken Given (ken@airtest.fdn.com); Zhang-Torres
Subject: Draft Air Operation Permit Revision For Review and Comment - Standard Carbon Project 0830170-007-AO

Attached for your review and comment, please find a preliminary draft of the air operation permit revision (DEP Project 0830170-007-AC) requested in the Standard Carbon LLC air permit application submitted on July 2, 2012, to incorporate the provisions of Construction Permits 0830170-004-AC and 0830170-005-AC into the facility air operation permit. This draft permit is being provided to give you the opportunity to review it prior to the official issuance of the FINAL permit.

Zell, David

From: Kristine Switt [kswitt@standardpurification.com]
Sent: Monday, August 20, 2012 1:41 PM
To: Zell, David; jsharpe@standardpurification.com
Cc: ken@airtest.fdn.com; Zhang-Torres
Subject: RE: CORRECTED ATTACHMENT FOR Draft Air Operation Permit Revision For Review and Comment - Standard Carbon Project 0830170-007-AO

Thanks, David,

We will review it by Friday.

Kristine Switt
352.465.5959

From: Zell, David [<mailto:David.Zell@dep.state.fl.us>]
Sent: Monday, August 20, 2012 1:10 PM
To: Zell, David; jsharpe@standardpurification.com; kswitt@standardpurification.com
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Please respond back with any comments or corrections no later than Tuesday August 21, 2012, if possible.

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Attachments: 0830170.007.a0.DRAFT.Standard Carbon.doc

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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.

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Attachments: 0830170.002.ao.003.ac.f.Standard Carbon.doc *X Incoming File*

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Thank you for your attention to this.

David

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

Zell, David

From: Flavors, Brandy
Sent: Monday, July 02, 2012 3:57 PM
To: jsharpe@standardpurification.com; ken@airtest.fdn.com
Cc: Zell, David; Bahtic, Nedin
Subject: 0830170-007-AO Standard Carbon, LLC - Operation Permit Revision

The Florida Department of Environmental Protection's Southwest District Office has received the following air permit application:

ARMS PA Project ID:	0830170-007-AO
Facility Name:	Standard Carbon, LLC
Project Description:	Operation Permit Revision to Incorporate 004-AC and 005-AC.
Permit Application Processor:	David Zell
Processor Phone Number:	(813) 632-7600, ext. xxx
Processor Email Address:	David.Zell@dep.state.fl.us
Date Received:	07/02/2012

Brandy Flavors
Engineering Specialist II
Air Resource Management
Department of Environmental Protection
Southwest District
13051 North Telecom Parkway
Temple Terrace, FL 33637
Phone: 813-632-7600 Ext. 119
Fax: 813-632-7668
Email: Brandy.Flavors@dep.state.fl.us

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

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