



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

NOTICE OF INTENT TO ISSUE AIR PERMIT

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

In the Matter of an
Application for Permit by:

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

DEP File No. 0830170-001-AC
Marion County


Dear Mr. Sharpe:

Enclosed is one copy of the Draft air permit for the Standard Carbon LLC facility located at 551 North U.S. Highway 41 in Dunnellon, Marion County. The Department's Intent to Issue Air Permit and the Public Notice of Intent to Issue Air Permit are also included.

The Public Notice of Intent to Issue Air Permit must be published one time only, as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected, pursuant to the requirements Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Southwest District Office within seven days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mara Grace Nasca, District Air Program Administrator at the above letterhead address. If you have any other questions, please contact the project engineer, David Zell at david.zell@dep.state.fl.us or by phone at 813-632-7600, ext. 118.

Sincerely,


Mara Grace Nasca
District Air Program Administrator
Southwest District

MGN/DRZ/pp

Enclosures

In the Matter of an
Application for Permit by:

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

DEP File No. 0830170-001-AC
Marion County

INTENT TO ISSUE AIR PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an air permit (copy of Draft permit enclosed) for the proposed project, detailed in the application specified above for the reasons stated below.

The applicant, Standard Carbon LLC, applied on December 15, 2008, to the Department for an air construction permit for its facility located at 551 North U.S. Highway 41 in Dunnellon, Marion County. The permit authorizes Standard Carbon LLC to construct and initially operate an activated carbon production facility.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that an air permit is required for this project.

The Department intends to issue this air permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting 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 Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department of Environmental Protection, 13051 N. Telecom Parkway, Temple Terrace, FL 33637-0926, (Telephone: 813-632-7600, Fax: 813-632-7668). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in Section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen days from the date of publication of Public Notice of Intent to Issue Air Permit. Written comments should be provided to the Department of Environmental Protection, 13051 N. Telecom Parkway, Temple Terrace, FL 33637-0926. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen 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 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.

All petitions filed under these rules shall contain:

- (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 the petitioner received notice of the agency decision;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (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 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 Department'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.

Standard Carbon LLC
Dunnellon Facility
Draft Air Construction Permit No.: 0830170-001-AC

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

Mediation is not available in this proceeding.

Any person may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, a copy of the draft permit, and all other materials available to the Department that are relevant to the permit decision. Additionally, the Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of "Public Notice of Intent to Issue Air Permit." Requests and written comments filed should be provided to the Florida Department of Environmental Protection at 13051 N. Telecom Parkway, Temple Terrace, FL 33637-0926, to the attention of Mara Grace Nasca (phone no. 813-632-7600) referencing the DEP file number listed above. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

Executed in Hillsborough County, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Mara Grace Nasca

Mara Grace Nasca
District Air Program Administrator
Southwest District

Standard Carbon LLC
Dunnellon Facility
Draft Air Construction Permit No.: 0830170-001-AC

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Intent to Issue Air Permit (including the Public Notice of Intent to Issue Air Permit and the Draft permit) was sent by certified mail before the close of business on 04-27-2009 to the person(s) listed:

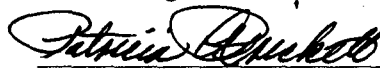
Mr. James Sharpe, CEO
Standard Carbon LLC
551 North U.S. Highway 41
Dunnellon, Florida 34432

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Intent to Issue Air Permit was mailed by U.S. Mail before the close of business on 04-27-2009 to the person(s) listed:

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

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


(Clerk)

04-27-2009
(Date)

Note: An electronic version of this Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit and the Draft permit will be posted on the Division of Air Resource Management's world wide web site. The web site address is:

<http://www.dep.state.fl.us/air/eproducts/apds/default.asp>

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OFFICIAL USE


Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Res: (Endo)	Mr. James Sharpe, CEO Standard Carbon LLC	
Tota	551 North U.S. Highway 41 Dunnellon, FL 34432	
Sent 1		
Street, or PO	0830170-001-AC Draft DZ 04/27/2009	
City, State, ZIP+4		

PS Form 3800, August 2006

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION **COMPLETE THIS SECTION ON DELIVERY**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

A. Signature X 	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
B. Received by (Printed Name) Kristine Swift	C. Date of Delivery 4/5/09

1. Article Addressed to:

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

0830170-001-AC Draft DZ 04/27/2009

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

600Z 5 - MAY
 2009

3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Registered <input type="checkbox"/> Insured Mail	<input type="checkbox"/> Express Mail <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> C.O.D.
4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	

2. Article Number 7007 0710 0003 0139 1410
 (Transfer from service label)

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Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Dept. of Environmental Protection
Air Resource Management
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

Dept. of Environmental Protection
MAY 07 2009
Southwest District



PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 0830170-001-AC
Standard Carbon LLC
Dunnellon Facility
Marion County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air permit to Standard Carbon LLC, for the facility located at 551 North U.S. Highway 41 in Dunnellon, Marion County. The permit authorizes Standard Carbon LLC to construct and initially operate an activated carbon production facility. MAILING ADDRESS: Standard Carbon LLC, 551 North U.S. Highway 41, Dunnellon, Florida 34432, to the attention of Mr. James Sharpe, CEO.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen days from the date of publication of this Public Notice of Intent to Issue Air Permit. Written comments should be provided to the Department of Environmental Protection, 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

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- (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 the petitioner received notice of the agency decision;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (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
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Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Florida Department of Environmental Protection, Southwest District, 13051 North Telecom Parkway, Temple Terrace, Florida.

The complete project file includes the application, technical evaluations, Draft permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Mara Grace Nasca, Southwest District Air Program Administrator, at 13051 North Telecom Parkway, Temple Terrace, Florida or call 813-632-7600, for additional information.

Any person may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, a copy of the permit draft, and all other materials available to the Department that are relevant to the permit decision. Additionally, the Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of "Public Notice of Intent to Issue Air Permit." Requests and written comments filed should be provided to the Florida Department of Environmental Protection at 13051 North Telecom Parkway, Temple Terrace, Florida 33637-0926, to the attention of Mara Grace Nasca (phone no. 813-632-7600) referencing the DEP file number listed above. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.



Florida Department of Environmental Protection

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

Charlie Crist
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Lt. Governor

Michael W. Sole
Secretary

PERMITTEE:

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

DRAFT Permit No.: 0830170-012-AC

County: Marion

Effective Date: xx/xx/xx

Expiration Date: 12/31/2010

Project: Activated Carbon Production Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-204 through 62-297 & 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the department and made a part hereof and specifically described as follows:

This construction permit authorizes the construction and initial operation of an activated carbon production facility, as described below.

Facility Description/Permitted Emissions Unit(s)

This facility produces activated carbon using recovered fly ash. (Note: This facility will consist of some new equipment, and some refurbished existing equipment from an activated carbon production facility previously operated at this site.)

Fly Ash Truck Receiving/Unloading (EU 001)

Fly ash will be received via trucks and unloaded by dumping into a new fly ash receiving hopper which will be housed in a new truck receiving building to control fugitive dust emissions. Emissions from the fly ash unloading activities in this building will be controlled by a new pulse-jet baghouse dust control device (Baghouse PJ-T). The new blower system associated with this baghouse (Blower BL-T) will also maintain a slight negative pressure in the receiving building to enhance fugitive dust control. The building's receiving door (approx 12' x 20') will also be equipped with plastic sheets to contain fugitive dust emissions.

Fly Ash Storage Silos (EU 002)

A blower system (Blower BL-1) will pneumatically transfer the fly ash to a new pulse-jet receiver baghouse (Baghouse PJ-1), from which fly ash will be gravity fed to three (3) existing fly ash storage silos (FA Silo Nos. 3, 9 and 11). Particulate matter emissions from the fly ash transfer will be ducted to and controlled by Baghouse PJ-1. The three (interconnected at the top) fly ash storage silos will be vented through a common low air flow (20 dscfm) bin vent filter (Bin Vent BV-1).

Kiln Fly Ash Hoppers (EU's 003 and 004)

Fly ash from the fly ash storage silos will be transferred pneumatically (using Blower BL-2) to a new pulse-jet receiver baghouses (Baghouses PJ-2 and PJ-3), from which fly ash will be gravity fed to into four (4) new kiln fly ash hoppers, two for each of the two existing kilns (Hoppers K1 and K2 for Kiln No. 1, and Hoppers K3 and K4 for Kiln No. 2). Particulate matter emissions from the fly ash transfer to

PERMITTEE:
Standard Carbon LLC

DRAFT Permit No.: 0830170-001-AC
Project: Activated Carbon
Production Facility

Hoppers K1 and K2 (EU 003) will be ducted to and controlled by Baghouse PJ-2, with emissions from the fly ash transfer to Hoppers K3 and K4 (EU 004) controlled by Baghouse PJ-3. These four (interconnected at the top) kiln fly ash hoppers will be vented through a common low air flow (5 dscfm) bin vent filter (Bin Vent BV-2).

Activated Carbon Kilns (EU 005)

Fly ash from the kiln fly ash hoppers will be gravity fed into two (2) existing kilns (Kiln Nos. 1 and 2 - EU 005) for conversion into activated carbon. The kilns each have a separate combustion chamber such that the kiln itself is heated indirectly and the combustion gases do not come into direct contact. The combustion chambers are fired with natural gas as the primary fuel, with propane fuel as backup fuel, at a maximum heat input rate of 8.0 MMBTU/hour for each combustion chamber, and exhaust through separate stacks from the kilns. (*Permitting Note: Each of the combustion chambers are exempt from permitting in accordance Rule 62-210.300(3)(a)(34), F.A.C.*) Steam for injection into the kilns will be supplied by new electric boilers. Exhaust gases from each of the kilns will pass through an existing heat exchanger and a new condensing heat exchanger prior to the emission control devices. Particulate matter emissions from each kiln are controlled by an existing cyclone separator precleaner, followed by an existing Ray Jet Model FF259 baghouse with a maximum design air flow rate of 2,900 dscfm. The two baghouses are in parallel and share a common fan which exhausts through a common stack. (*Permitting Note: Due to the common exhaust stack, the kilns are permitted as a single emission unit (EU 005).*) The total maximum fly ash input rate into the kilns is expected to be 4.0 tons/hour (combined).

Raymond Mill and Ball Mill No. 1 (EU's 006 and 007)

The activated carbon from each kiln discharges via separate cooling screw conveyor which cools and transfers the activated carbon to the existing Raymond Mill Receiving Hopper. The existing Model 5057 Raymond Mill (EU 006) has rollers in it that will grind (mill) the product into a smaller size. The mill includes a blower which supplies air to lift the ground carbon up through an internal whizzer which is part of the mill. The whizzer spins like a bicycle wheel with spokes, and the finely ground carbon passes through the whizzer while larger particles are knocked down. The fine material discharges to the existing Raymond Mill Outlet Hopper. The oversize material (estimated at 1% of the material processed) is transferred by screw conveyor to a new Raymond Mill Reject Hopper. The Raymond Mill will operate at an estimated maximum material input rate of 4.0 tons/hour. Particulate matter emissions from the Raymond Mill will be controlled by an existing Mikro-Pulsaire Type 65810 baghouse with a maximum design air flow rate of 3,400 dscfm.

As a standby backup to the Raymond Mill for periods when it is down due to maintenance or repairs, the facility also includes an existing ball mill (Ball Mill No. 1) (EU 007) for grinding the activated carbon. This ball mill operates at a maximum rate of 2.0 tons/hour. This ball mill is a standby backup unit only and will not operate at the same time the Raymond Mill is in service. Particulate matter emissions from Ball Mill No. 1 will be controlled by the same Mikro-Pulsaire baghouse as the Raymond Mill.

(Existing) Whizzer System (EU 008)

Reject oversized carbon from the Raymond Mill Reject Hopper will be transferred pneumatically (using Blower BL-4) to a new pulse jet receiver baghouse (Baghouse PJ-5). From there the reject carbon is gravity fed to an existing Whizzer Receiving Hopper and through the existing Whizzer, where the carbon size is reduced and sorted. Particulate matter emissions from the transfer of carbon to the Whizzer Receiving Hopper and the Whizzer will be ducted to and controlled by pulse-jet baghouse PJ-5. Reduced carbon from the Whizzer is transferred pneumatically (using Blower BL-4A) to the carbon silos (with particulate matter emissions controlled by Baghouse PJ-4).

PERMITTEE:
Standard Carbon LLC

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Production Facility

(Permitting Note: At the time of processing of this construction permit it is possible that the Raymond Mill reject material will be gravity fed from the Raymond Mill Reject Hopper back through the Raymond Mill whizzer, where it will be further separated and the resulting reject material returned by screw conveyor to the Raymond Mill Receiving Hopper for additional processing through the Raymond Mill. Under this scenario the existing Whizzer and associated equipment would not be used/installed.)

Carbon Storage Silos (EU 009)

The Raymond Mill (and standby Ball Mill No. 1) discharges the activated carbon to the Raymond Mill Outlet Hopper. From the Outlet Hopper the carbon is pneumatically transferred (using Blower BL-3) to a pulse-jet receiver baghouse (Baghouse PJ-4, and gravity fed from there into five (5) existing carbon silos (Carbon Silos 2, 4, 6, 8 and 14) (EU 009). Particulate matter emissions from transfer of carbon to Carbon Silos 2, 4, 6, 8 and 14 are ducted to and controlled by the new pulse-jet baghouse PJ-4. Carbon Silos 2, 4, 6 and 8 (interconnected at the top) will be vented through a common low air flow (20 dscfm) bin vent filter (Bin Vent BV-3).

Bulk Truck/Railcar Carbon Loading (EU 011) and Carbon Storage Silo 14 (EU 010)

Carbon for bulk truck/railcar loading will be transferred to Carbon Silo 14 from the Raymond Mill (gravity fed from PJ-4), or from Carbon Silos 2, 4, 6, and 8 (EU 010). When the carbon is transferred from one of the four carbon silos, it passes through a new pulse jet receiver baghouse (Baghouse PJ-6) and feeds into Carbon Silo 14. Carbon Silo 14 is located above the railroad tracks where trucks or railcars are loaded with finished carbon product for shipment. Trucks/railcars are loaded from the silo by gravity through a Rotor Lock valve. Particulate matter emissions from transfer of carbon to Carbon Silo 14, and from truck railcar loading are controlled by Baghouse PJ-6. Carbon Silo 14 will be vented through a low air flow (20 dscfm) bin vent filter (Bin Vent BV-5).

Bagging System (EU's 012 and 013)

Carbon for bagging will be transferred pneumatically (using Blower BL-5) from the carbon silos to the Bagging Storage Tower (EU 012). From this tower the carbon will drop into the Bagging Hopper, and from the hopper drops into the Bagging Unit (EU 013), which consists of two manual operation bagging machines. The Bagging Unit operates at a maximum design rate of 2.0 tons/hour (1.0 ton/hour for each bagging machine). Particulate matter emissions from the Bagging Storage Tower and Bagging Unit are vented to and controlled by an existing Flex-Kleen Model 84BVBS-25 baghouse with a maximum design air flow rate of 600 dscfm. The Bagging Hopper has a low air flow (5 dscfm) bin vent filter (Bin Vent BV-4).

Blower Note: All of the blowers (BL) used to move flyash and activated carbon have a fixed speed.

Rule Applicability:

Rule 62-296.320(4)(a), F.A.C. (General Particulate Emission Limiting Standards - Process Weight Table) applies to several operations at this facility (Kiln Nos. 1 and 2, Raymond Mill, Ball Mill No. 1) which "process raw materials to produce a finished product through a chemical or physical change". In order to limit the potential to emit particulate matter from these operations, the applicant has requested that more stringent particulate matter emission limitations be established for these emission units than those that would be applicable from the Process Weight Table equation at higher process rates.

PERMITTEE:
Standard Carbon LLC

DRAFT Permit No.: 0830170-001-AC
Project: Activated Carbon
Production Facility

Title V Major Source Status:

This permit establishes the facility as a synthetic non-Title V source by requiring the use of air pollution control equipment (i.e., baghouse dust control devices) such that the facility's particulate matter emissions are less than the threshold limits required for the facility to be considered a major source per Chapter 62-213, F.A.C.

Emission Sources/Activities Exempted From Air Permitting:

The following emission sources (also discussed above in the facility description) are exempt from air permitting in accordance with the provisions of the Rule 62-4 .040(1)(b), F.A.C. (emissions deemed insignificant) exemption:

- the five (5) material storage silo bin vent filters (Bin Vent filters BV-1 through BV-5).

The following emission sources (also discussed above in the facility description) are exempt from air permitting in accordance with the provisions of Rule 62-210.300(3)(a)(34), F.A.C. (Conditional Exemptions -External Combustion Heating Units):

- the two 8.0 MMBtu/hour natural gas/propane fired combustion chambers (Combustion Chamber Nos. 1 and 2) associated with the two kilns.

Facility Information Summary

Location: 551 North U.S. Highway 41 in Dunnellon, Marion County

UTM: 17-360.2 E 3230.0 N **Latitude:** 29° 11' 33"N **Longitude:** 82° 26' 17"W

Facility ID: 0830170 *(Note: Previous Facility ID 0830011 was also located at this site - see Permitting History below.)*

Emission Unit (EU) ID Nos. and Descriptions:

EU ID No.	Description	Associated Emission Control Device/Bin Vent
001	Fly Ash Receiving/Unloading	PJ-T
002	Transfer to Fly Ash Storage Silo Nos. 3, 9, and 11	PJ-1/BV-1
003	Transfer to Kiln Fly Ash Hoppers K1 and K2	PJ-2/BV-2
004	Transfer to Kiln Fly Ash Hoppers K3 and K4	PJ-3/BV-2
005	Kiln Nos. 1 & 2 (<i>common exhaust stack</i>)	Rayjet Model FF260 for each
006	Raymond Mill	Mikro-Pulsaire Model 65810
007	Ball Mill No. 1 (<i>standby backup for Raymond Mill</i>)	<i>(same as Raymond Mill)</i>
008	Transfer to Whizzer Hopper and Whizzer operation	PJ-5
009	Transfer from Raymond Mill Outlet Hopper to Carbon Silo Nos. 2, 4, 6, 8, and 14	PJ-4/BV-3
010	Transfer from Carbon Silos 2, 4, 6 and 8 to Carbon Silo No. 14	PJ-6/BV-5
011	Bulk Truck/Railcar Loading from Carbon Silo 14	PJ-6
012	Transfer to Bagging Storage Tower	Flex-Kleen 84BVBS-25
013	Activated Carbon Bagging System	<i>(same baghouse as EU 012)/BV-4</i>

NOTE: Please reference the Facility Name, Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.

PERMITTEE:
Standard Carbon LLC

DRAFT Permit No.: 0830170-001-AC
Project: Activated Carbon
Production Facility

Permitting History

This is the first air permit for this facility at this site under this ownership. Previously Acticarb Tailored Products LLC (Acticarb) was permitted for a facility operating at this location (Facility ID No. 0830011), however this facility ceased operations in September of 2005 and the air operation permit for this facility (0810011-012-AO) expired on 12/02/08. Subsequent to this closure, Standard Carbon LLC bought the facility and has applied for a construction permit to modify the facility for its operations. This will include removing some existing equipment, utilizing some existing equipment, and adding new equipment and baghouse control devices. To differentiate and separate this new modified facility under the ownership of Standard Carbon LLC, from the previous Acticarb facility, it has been assigned a new Facility ID No. of 0830170.

Attachments to This Permit:

General Conditions (*version dated 11/1/05*)

SPECIFIC CONDITIONS:

1. General Conditions - A part of this permit is the attached 15 General Conditions.
[Rule 62-4.160, F.A.C.]
2. Other Requirements - Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C., or any other requirements under federal, state, or local law.
[Rule 62-210.300, F.A.C.]

Operating Limitations and Standards -

3. Permitted Hours of Operation - This facility is 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 permit application dated 01/30/09]
4. Operation of Ball Mill No. 1 (EU 007) - Ball Mill No. 1 is permitted to operate only as a backup to the Raymond Mill (EU 006), and as such shall not operate unless the Raymond Mill is shut down. (*Note: See Specific Condition No. 21 for associated recordkeeping requirements.*)
[Rule 62-210.200 (Definition of Potential to Emit), F.A.C.; as requested by applicant in permit application dated 01/30/09]
5. Maximum Permitted Activated Carbon Production Rate - The production of activated carbon from this facility shall not exceed 15,000 tons in any 12 consecutive month period. For the purpose of demonstrating compliance with this limitation, production shall be defined as the total activated carbon shipped from the facility by truck and railcar (EU 011); plus any activated carbon bagged in the Bagging Unit (EU 013). (*Note: See Specific Condition No. 20 for associated recordkeeping requirements.*)

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6. Circumvention of Control Equipment - The permittee shall not circumvent any air pollution control device or allow the emissions of air pollutants without the applicable air pollution control device (baghouses) operating properly. Increasing the volume of any exhaust stream for the purpose of reducing stack exhaust concentrations is forbidden. This includes allowing dilution air to enter the system through leaks, open vents, or similar means. (*Note: See Specific Condition No. 10 for baghouse visible emissions (VE) limitations associated with this circumvention requirement.*)
[Rule 62-210.650, F.A.C.]

Emission Limitations

7. Maximum Allowable Particulate Matter Emissions from Kilns (EU 005); and from Raymond Mill (EU 006) /Ball Mill No. 1 (EU 007) - Particulate matter emissions from Kiln Nos. 1 and 2 combined (they share a common exhaust stack); and particulate matter emissions from the Raymond Mill or Ball Mill (they share a common baghouse control device and exhaust stack, but are not permitted to operate at the same time), shall each not exceed the lower limit (i.e., more stringent) of the following:

- A. 5.0 pounds/hour; and
- B. the maximum emission rate allowed by the following Process Weight Table equation contained in Rule 62-296.320(4)(a)(2), F.A.C. (General Particulate Emission Limiting Standards - Process Weight Table):

$$\text{Maximum Allowable Emission Rate (pounds/hour)} = 3.59 \times P^{0.62}$$

Where P = process (input) rate in tons/hour (TPH)

(Note: At process (input) rates above 1.7 tons/hour the 5.0 pounds/hour emission limit is more stringent (i.e., lower). At a process rate equal to or less than 1.7 TPH, the above Process Weight Table equation limit will be more stringent.)

(Note: See Specific Condition No. 9 for alternate visible emissions (VE) limitations associated with showing compliance with the above PM emission limitations.)

[Rule 62-296.320(4)(a)(2), F.A.C., and as requested by applicant in construction permit Application dated 01/30/09 to limit PM Potential to Emit]

8. General Pollutant Emission Limiting Standard: Visible Emissions (VE) - Except for emissions units that are subject to a particulate matter or opacity limit established elsewhere by this permit (*see Specific Condition Nos. 9 and 10*) no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Rule 62-297.401, F.A.C.

[Rules 62-296.320(4)(b)1, 62-296.320(4)(b)4, and 62-297.401, F.A.C.]

(Permitting Note: This is the visible emissions (VE) limitation that applies to the bin vents (BV-1 through BV-5).

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9. Alternate Visible Emissions Limitations in Lieu of PM Testing for Kilns (EU 005), and from Raymond Mill (EU 006) /Ball Mill No. 1 (EU 007) - Due to the expense and complexity of conducting a stack test on a minor source of particulate matter, and because a baghouse is used as the emission control devices, the Department, pursuant to the authority granted under Rule 62-297.620(4), F.A.C., hereby establishes a visible emission (VE) limitation not to exceed an opacity of five percent (5%) from the applicable exhaust stack in lieu of a particulate stack test to show compliance with the particulate matter emission limits of Specific Condition No. 7. The applicable exhaust stacks (2) are the Kilns 1 and 2 common exhaust stack (EU 005), and the Mikro-Pulsaire Model 65810 baghouse exhaust for the Raymond Mill or Ball Mill No. 1. (EU's 006 and 007). Should the Department have reason to believe the particulate emission standard is not being met, the Department shall require that compliance with the particulate emission standard be demonstrated by the applicable test method specified in the applicable rule (*see Specific Condition No. 17 (Special Compliance Tests)*).
[Rules 62-4.070(3), and 62-297.620(4), F.A.C.]

10. Visible Emissions (VE) Limitation For Material Handling Receivers/Baghouses (EU's 001, 002, 003, 004, 008, 009, 010, 011, 012 and 013) - In order to provide reasonable assurance that the material (fly ash and activated carbon product) handling receiver baghouses and dust control baghouses are operating properly in accordance with Specific Condition No. 6 (Circumvention of Control Equipment), the Department establishes a visible emission limitation not to exceed an opacity of 5% from each of these baghouse exhausts. This VE limit applies to the following baghouses/EU's: PJ-T (EU 001), PJ-1 (EU 002), PJ-2 (EU 003), PJ-3 (EU 004), PJ-4 (EU 009), PJ-5 (EU 008), PJ-6 (EU's 010 & 011), and the Flex Clean Model 84BVBS-25 (EU's 012 & 013).
[Rules 62-4.070(3), and 62-210.650, F.A.C.]

11. General Pollutant Emission Limiting Standards: Objectionable Odor - No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An objectionable odor is any odor present in the outdoor atmosphere, which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.
[Rules 62-210.200 (Definition of "Objectionable Odor") and 62-296.320(2), F.A.C.]

12. General Pollutant Emission Limiting Standards: Unconfined Particulate Matter - All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. (*See Specific Condition No. 25 for requirement to submit specific reasonable precautions as part of the application for an operation permit for this facility.*)
[Rule 62-296.320(4)(c), F.A.C.]

13. Excess Emissions - Excess Emissions resulting from startup, shutdown, or malfunction shall be permitted providing (1) Best operational practices to minimize emissions are adhered to and (2) The duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for a longer duration. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may be reasonably prevented during startup, shutdown, or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

Compliance Testing Requirements

14. Visible Emissions (VE) Compliance Testing Requirements - In order to demonstrate compliance with the visible emissions limitations of Specific Condition Nos. 9 and 10, the exhausts for the baghouses listed below shall each be tested for visible emissions (VE) within 45 days after initial operation of the facility producing activated carbon product for commercial sale (see also Specific Condition No. 24 for start of operation notification requirements), and (except as noted otherwise) annually thereafter during each federal fiscal year (i.e., between October 1 and September 30). The processes/activities required to be in operation during the 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 operations*.

EU ID	Baghouse ID	Operation(s) to be conducted during emissions testing
001	PJ-T	Fly ash truck unloading
002	PJ-1	Transfer of fly ash to Flyash Storage Silos
003	PJ-2	Transfer of fly ash to Kiln Hoppers K1 and/or K2
004	PJ-3	Transfer of fly ash to Kiln Hoppers K3 and/or K4
009	PJ-4	Transfer of activated carbon from Raymond Mill to Carbon Silos
008	PJ-5	Transfer of Raymond Mill rejects to Whizzer Receiving Hopper and operation of the Whizzer
010 & 011	PJ-6	Transfer of carbon to Carbon Silo 14 and loading of carbon product into trucks ¹
010 & 011	PJ-6	Transfer of carbon to Carbon Silo 14 and loading of carbon product into railcars ¹
005	Rayjets (2)	Operation of both Kilns 1 and 2 (Rayjet baghouses for each kiln exhaust through a common stack)
006	Mikro-Pulsaire	Operation of the Raymond Mill
007	Mikro-Pulsaire	Operation of Ball Mill No. 1 ²
012 & 013	Flex-Kleen	Transfer of activated carbon to the Bagging System Storage Tower and operation of the Bagging Unit bagging machines

¹ Initial testing not required if this mode of shipping of final product (i.e., by truck or by railcar) is not being currently used. Testing must be conducted within 45 days first operation in this mode if initial testing is not done.

² Initial testing of Ball Mill No. 1 is not required if the ball mill is not considered operational. Testing must be conducted within 45 days first operation of Ball Mill No. 1 if initial testing is not done. Frequency of additional testing of Ball Mill No. 1 as a standby backup piece of equipment will be established by the facility operation permit.

(* Material Transfer 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. Since material is blown to the pulse jet baghouses and then gravity fed to the storage silos/hoppers, it does not matter what silo(s)/hopper(s) the material is being transferred to. Any emissions from the material falling into the silos/hoppers either settle out in the silos or are filtered out by the bin vent filters (BV) which exhaust the displaced air from the silos.)

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15. Compliance Test Reports - The permittee shall file a report with the Air Compliance Section of the Department's Southwest District Office on the results of each required compliance test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after each test is completed. The test report submittal shall meet all applicable requirements of Chapter 62-297, F.A.C. Specifically, the reports shall provide the following information (where applicable) from the test period:

- A. All test reports shall include a statement of the material transfer operations that were being done during the test period and a statement of whether they represented normal operating conditions.
- B. For Truck Unloading (EU 001 w/baghouse PJ-T) the test report shall include a statement of the number of trucks unloaded during the test period and the weight of fly ash unloaded from each truck (tons).
- C. For Kilns 1 and 2 (EU 005 w/common exhaust stack from the Rayjet baghouses) the test report shall include the fuel being fired in the kiln combustion chambers, and the estimated flyash process input rates (tons/hour) during the test period.
- D. For Raymond Mill and Ball Mill No. 1 (EU's 006 and 007 w/Mikro-Pulsaire baghouse) the test report shall include the estimated carbon process input rates (tons/hour) during the test period.
- E. For Truck/Railcar Loading (EU 011 w/baghouse PJ-6) the test report shall include a statement of the estimated truck or railcar activated carbon loading rate (tons/hr) during the test period. As required in A. above, the test report shall also include a statement as to whether activated carbon was being transferred to Carbon Silo 14 during the test period (*see EU 010 and 011 operation during testing requirements in Specific Condition No. 14*). If testing is not done during both truck and railcar loading (separate tests), then the test report shall include a statement of why that mode of product loading/shipping was not tested and when it is anticipated that this mode of loading shipping will be first used or used next.
- F. For the Bagging Storage Tower and Bagging Unit (EU's 012 and 013 w/Flex Kleen baghouse) the test report shall include the estimated bagging rate during the test period. As required in A. above, the test report shall also include a statement as to whether activated carbon was being transferred to the Bagging Storage Tower during the test period (*see EU 012 & 013 operation during testing requirements in Specific Condition No. 14*).

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

16. Visible Emissions (VE) Compliance Testing Method and Procedures - Compliance with the visible emission (VE) limitations specified in this permit shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C. and 40 CFR 60, Appendix A. The Method 9 VE compliance test(s) 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.

[Rules 62-296.320(4)(b)4, 62-297.310(4)(a)(2), 62-297.320, and 62-297.4101 F.A.C.]

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17. Particulate Matter (PM) Test Methods - When compliance testing is required by the Department (*see Specific Condition No. 19 - Special Compliance Tests*), compliance with the particulate matter emission limitations specified in Specific Condition No. 7 shall be determined using EPA Methods 1, 2, 3, 4 and 5 contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Chapter 62-297, F.A.C. and 40 CFR 60, Appendix A.
[Rules 62-297.310 and 62-297.401, F.A.C.]

18. Compliance Test Notification - At least 15 days prior to the date on which any compliance test is due to begin, the permittee shall provide written notification of the test to the Air Compliance Section of the Department's Southwest District Office. 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 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.]

19. Special Compliance Tests - When the Department, after investigation, has good reason (such as complaints, increased visible emissions, or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emission unit and to provide a report on the results of said tests to the Department.
[Rule 62-297.310(7)(b), F.A.C.]

Monitoring and Recordkeeping Requirements

20. Activated Carbon Production Records - In order to demonstrate compliance the limits of Specific Conditions No. 5, the permittee shall maintain monthly activated carbon production records. At a minimum, the production records shall include the following

- A. the quantity of activated carbon product loaded out to trucks (tons) (EU 011);
- B. the quantity of activated carbon loaded out to railcars (tons) (EU 011);
- C. the quantity of activated carbon bagged in the bagging unit (tons) (EU 013);
- D. the total monthly production, which would be the sum of A. B and C. above (tons/month); and
- E. the total production for the most recent consecutive 12-month period (the sum of the monthly totals in D. above for the most recent 12 consecutive months) (tons/12 consecutive months).

The above monthly records shall be completed within 15 days of the end of each month.
[Rule 62-4.070(3), F.A.C.]

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21. Ball Mill No. 1 Operating Time Records - In order to document compliance with Specific Condition No. 4, the permittee shall keep records of all periods of operation of Ball Mill No. 1 (EU 007), including the date, and the start and stop time of the operating periods. The records shall also show the operating status of the Raymond Mill, and the reason the Raymond Mill was not operating (i.e., repairs, maintenance, etc.).

[Rule 62-4.070(3), F.A.C.]

22. Record Retention - The records required in this permit shall be maintained at the facility for a minimum of three years, and made available to the Department upon request.

[Rule 62-4.070(3), F.A.C.]

Notification and Reporting Requirements

23. Annual Operating Report (AOR) - 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 Air Compliance section of the Southwest District of the Department.

[Rules 62-4.070(3), and 62-210.370(3), F.A.C.]

24. Start of Operation Notification - The permittee shall notify the Air Compliance Section of the Department's Southwest District Office of the start of operation of this facility. The written notification shall be sent within 15 days of the first commercial operation of the facility producing activated carbon product for sale. [Rule 62-4.070(3), F.A.C.]

Operation Permit

25. Operation Permit Application - A completed application for an air operation permit for this facility shall be submitted to the Air Permitting Section of the Department's Southwest District Office within 90 days of initial operation of the facility producing activated carbon product for commercial sale (*see also Specific Condition No. 24 for start of operation notification requirements*), but no later than 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, 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.;
(Application Fee Permitting Note: Based on the configurations described in the construction permit application and reflected in this permit, EU's 002, 003 004, 009, 010, and 012 are considered as similar sources (i.e., only one fee required for the group of EU's); and EU's 006 and 007 are considered as similar sources (i.e., only one fee required for both EU's.)*
- C. the manufacturer, model number and maximum rated design air flow rate (dscfm) for each of the PJ pulse-jet receiver baghouses (i.e., for PJ-1 through PJ-6);

(continued)

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25. *(continued)*

- D. a description of any as-built changes to the equipment or operations from that submitted with the construction permit application and included in this construction permit;
- E. a copy of the initial visible emissions compliance test reports required by Specific Condition Nos. 14 and 15;
- F. copies of the most recent month of production records specified in Specific Condition No. 20, and Ball Mill No. 1 operation records specified in Specific Condition No. 21; and
- G. a description of the site specific reasonable precautions that will be taken at this facility to prevent and control generation of unconfined emissions of particulate matter (*see Specific Condition No. 12*).

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

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

DRAFT

Mara Grace Nasca
District Air Program Administrator
Southwest District

ATTACHMENT - GENERAL CONDITIONS

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes (F.S.). The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. Not applicable to Air Permits.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sample or monitor any substances or parameters at any location reasonable necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of noncompliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

ATTACHMENT - GENERAL CONDITIONS

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Section 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rule 62-4.120 and 62-730.300 F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- Determination of Best Available Control Technology (BACT)
- Determination of Prevention of Significant Deterioration (PSD)
- Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - 1. the date, exact place, and time of sampling or measurements;
 - 2. the person responsible for performing the sampling or measurements;
 - 3. the dates analyses were performed;
 - 4. the person responsible for performing the analyses;
 - 5. the analytical techniques or methods used;
 - 6. the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

16. Not applicable to Air Permits.

17. Not applicable to Air Permits.



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

P.E. CERTIFICATE STATEMENT

PERMITTEE
Standard Carbon LLC

Air Permit No. 0830170-001-AC
Marion County

Project Type: AC00

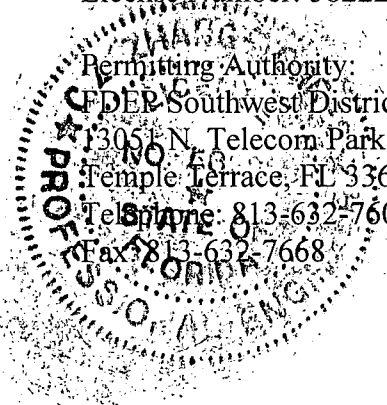
Project Description: The permit authorizes Standard Carbon LLC to construct an activated carbon production facility, which includes new to-be-installed equipment as well as refurbished existing equipment.

The Department's full review of the project and rationale for issuing the draft permit is provided in the Technical Evaluation and Preliminary Determination.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological and meteorological features).

Cindy Zhang Torres 4/22/09
C.Z. Zhang-Torres, P.E. Date
License Number: 58222

Permitting Authority:
FDEP Southwest District
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: 813-632-7600
Fax: 813-632-7668



MEMORANDUM

TO: Mara Grace Nasca
District Air Program Administrator

THRU: Cindy Zhang-Torres, P.E., Air Permitting Supervisor *cf*

FROM: David Zell, Air Permitting Engineer *DZ*

DATE: 04/16/09

SUBJECT: Draft Initial Construction Permit - Permit No: 0830170-001-AC
Standard Carbon LLC - New Activated Carbon Production Facility

DAY 90: 07/05/09

An application for a construction permit for a new activated carbon production facility was received from Standard Carbon LLC on 12/15/08. Additional information was requested 01/13/09. A response was received on 02/03/09, which included significant changes to the project and revised emission units sections of the application. An updated PM PTE spreadsheet was received via email on 03/03/09. During the process of drafting the permit, additional process related questions were asked via a phone call with the permittee's consultant on 03/31/09, with responses received during the phone call and via email on 03/31/09 and 04/06/09. The 04/06/09 response included additional changes to the project (and potential emissions - an updated PM PTE spreadsheet and revised combustion calculations were included).

This facility is at the same location as the previously permitted Acticarb, Inc. facility (ARMS Facility ID 0830011) and will use some of the equipment from that previous plant. ARMS Inventory shows the Acticarb facility as Inactive, with a Final Shutdown Date of 09/28/05. The most recent Acticarb operation permit (0830011-012-AO) expired on 12/02/08. (*Note: Acticarb submitted an operation permit renewal application on 08/27/08, but then withdrew it on 10/28/08*). This application for startup of a plant at this location under new ownership and including a significant amount of new to-be-installed equipment (as well as refurbished existing equipment) is considered a "new" facility and was assigned a new facility ID (0830170).

See the first pages of the draft permit for a detailed description of the facility production process and control equipment, and for rule applicability notes. Assigning of the emission units was discussed with Cindy Zhang-Torres and Jim McDonald on 03/06/09.

See the technical evaluation for emission information, and the draft permit and technical evaluation for rule applicability and permit exemption discussions.

Since this is a new facility, not yet operating, no comments were requested or received from the compliance or enforcement sections.

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

Application Fee Note: The applicant submitted fee of \$6250 with the application. At the time the application was received it was not possible to verify if this fee was correct, since it was not clear how the emission units would be assigned and what their PTE would be. Now after the final emission units have been assigned and potential emissions determined, it is possible to evaluate what the fee should be. I have done this on a separate sheet for your review. I feel that the correct fee is \$4000 and therefore a \$2250 refund is due back to the applicant. (Note: This issue of a fee refund was also raised by the applicant's consultant at the end of his 01/30/09 RAI response (which also included a revised application).

DZ Standard Carbon EU/Emission Source Worksheet (0830170-001-AC)

Permit EU ID	Appl. ID	Description	Pulse Jet Baghouse ID	Bin Vent ID	Process TPH	Proc Wt Limit	VE Limit	Req VE Test	Notes
001	1	(BL-T) Truck Receiving Bldg	PJ-T		20	NA	5% Circum	Yes	
002	2	(BL-1) Truck Unloading to Flyash Storage Silos # 3, 9, 11	PJ-1		"	NA	5% Circum	Yes	
002	3	Fly Ash Silos		BV-1			20% Gen Facil	No	exempt
003	3	Fly Ash to Kiln Hoppers K1 and K2	PJ-2		4	NA	5% Circum	Yes	
004	3	Fly Ash to Kiln Hoppers K3 and K4	PJ-3		"	NA	5% Circum	Yes	
003/004	3	Kiln Hoppers		BV-2		NA	20% Gen Facil	No	exempt
Exempt	4	Kiln Combustion Chambers # 1&2	none			NA	20% Gen Facil	Yes	
005	4	Kilns # 1 and 2 (Separate kilns & BH's, common stack)	Rayjet FF260 (for each kiln)		4	5.0 or Proc WT	5% in lieu of PM test	Yes	
006	5	Raymond Mill	Mikro-Pulsaire 65810		4	5.0 or Proc WT	5% in lieu of PM test	Yes	
007	6	Ball Mill #1 (same BH/stack as Raymond Mill) (standby backup for Raymond Mill)	same as above		2	5.0 or Proc WT	5% in lieu of PM test	Yes	Test if operates
008	8	(BL-4) Rejects to Whizzer + Whizzer Oper.	PJ-5		1	NA	5% Circum	Yes	
009	7	Whizzer Discharge to Silo	PJ-4		1	NA	5% Circum	Yes	
009	7	(BL-3) Product to Carbon Storage Silos (4)	PJ-4		8	NA	5% Circum	Yes	
009	7	Transfer to Carbon Storage Silos #2, 4, 6, 8, & 14		BV-3		NA	20% Gen Facil	No	exempt
010	9	(BL-5) Transfer from Carbon Silos to Carbon Silo 14	PJ-6		12	NA	5% Circum	Yes	
011	9	Truck/Railcar Loading from Carbon Silo 14	PJ-6	BV-5	20	NA	5% Circum	Yes*	Separate test for Truck & Rail
011	9	Carbon Silo 14		BV-5		NA	20% Gen Facil	No	exempt
012	10	(BL-5) Carbon Silos to Bagging Storage Tower	Flex-Kleen Model 84BVBS-25		12	NA	5% Circum	Yes	
013	10	Bagging Unit	same as above		0.9	NA	5% Circum	Yes	
013	10	Bagging Hopper		BV-4	0.9	NA	20% Gen Facil	No	exempt

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION
FOR
Standard Carbon LLC
Marion County

Construction Permit Application Number
0830170-001-AC

Florida Department of Environmental Protection

Southwest District

Temple Terrace, Florida

April 16, 2009

Prepared by: David Zell

I. Project Description:

A. Applicant:

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

B. Professional Engineer:

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

C. Project Location:

The proposed project is located at 551 North U.S. Highway 41 in Dunnellon, Marion County. (Note: This location was also the site of a previously permitted facility, Acticarb, Facility ID 0830011.)

D. Project Summary:

The proposed project is the construction of an activated carbon production facility is at the same location as the previously permitted Acticarb, Inc. facility (ARMS Facility ID 0830011). This application for startup of a plant at this location under new ownership and including a significant amount of new to-be-installed equipment (as well as refurbished existing equipment) is considered a "new" facility and was assigned a new facility ID (0830170). The facility basically consists of flyash (source of carbon) receiving, kilns, milling, bulk product loadout to trucks/ railcars, and product bagging operations, along with associated material transfer operations and storage silos/hoppers. See the first pages of the permit for a more detailed description of the facility production process and control devices

E. Application Information:

Application Received on:	12/15/08
Additional Information Requested on:	01/13/09, 03/03/09, and 03/31/09
Additional Information Received on:	02/03/09, 03/03/09, 03/06/09, 03/31/09 and 04/06/09
Application Complete:	04/06/09

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. - Sources 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 PSD minor source
Rule 62-296.320(4)(a), F.A.C. - General Particulate Emission Limiting Standards: Process Weight Table	Y	the process weight table rule applies (only) to the kilns, the Raymond Mill, and the Ball Mill, as these are the only activities where a chemical or physical change occurs
Rule 62-296.320(4)(c), F.A.C. - General Particulate Emission Limiting Standards : Unconfined Emissions of PM	Y	material handling operations will be a potential source of unconfined particulate matter emissions
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	not expected to be a source of VOC, but could be a source of 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 an attainment area for ozone
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	this is a new source, therefore not subject to PM RACT rule
Rule 62-204.800, F.A.C. - Stds of Performance for New Stationary Sources (NSPS)	N	there is no applicable source category
Rule 62-204.800, F.A.C. Nat'l Emission Std for Haz. Air Pollutants (NESHAPS 40 CFR 61)	N	there is no applicable source category
Rule 62-204.800, F.A.C. Nat'l Emission Std for Haz. Air Pollutants for Source Categories a.k.a. MACT (NESHAPS 40 CFR 63)	N	Facility is not a major source of HAP emissions
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 and/or PM testing is required for multiple emission units.

III. Summary of Potential and Allowable Emissions

a. PM/PM10 and Visible Emissions

EU No.	EU Description (Blower ID)	Baghouse ID/Manuf	Potential TPY PM/PM ₁₀ Emissions ¹	Allowable PM Emissions ²	Visible Emissions (VE) Limit
001	Flyash Receiving/Unloading (BL-T)	PJ-T	6.76	NA	5% (circum.)
002	Transfer to Flyash Silos 3, 9, 11 (BL-1)	PJ-1	1.24	NA	5% (circum.)
003	Transfer to Kiln Hoppers K1 & K2 (BL-2)	PJ-2	0.56	NA	5% (circum.)
004	Transfer to Kiln Hoppers K3 & K4 (BL-2)	PJ-3	0.56	NA	5% (circum.)
005	Kilns # 1 and 2 (common stack)	Rayjet	21.90	5.0 lbs/hr, or PWT whichever is lower	5% in lieu of PM test
006	Raymond Mill	Mikropulse	21.90	5.0 lbs/hr, or PWT whichever is lower	5% in lieu of PM test
007	Ball Mill #1	(same BH as EU 006)	(included in above)	5.0 lbs/hr, or PWT whichever is lower	5% in lieu of PM test
008	Transfer to Whizzer & Whizzer Operation (BL-4)	PJ-5	0.17	NA	5% (circum.)
009	Transfer from Raymond Mill Outlet Hopper to Carbon Silos 2, 4, 6, 8, and 14 (BL-3)	PJ-4	0.85	NA	5% (circum.)
010 & 011	Transfer from Carbon Silos 2, 4, 6 and 8 to Carbon Silo 14 (BL-5) & Truck/Rail Loadout	PJ-6	0.68	NA	5% (circum.)
012 & 013	Transfer to Bagging Storage Tower (BL-5) & Bagging Unit	Flex-Kleen	0.68	NA	5% (circum.)
Exempt ⁴	Bin Vents (BV-1 through BV-5)	BV-1 to BV-5	0.081	NA	20% facility-wide
Exempt	Combustion Chambers (see below)	NA	0.42	NA	20% facility
	Facility Total		55.79 ³	NA	20 % facility-wide limit

BL = Blower PJ = Pulse Jet baghouse BV = Bin Vent Filter BH = baghouse

Notes:

¹ Potential TPY PM emissions based on conservation emission factor of 0.03 grains/dscf from each of the baghouses, the maximum baghouse design air flow rate, and 8,760 hours/year; or 5.0 lb/hr limit and 8,760 hours/yr if applicable (EU's 005-007).

² Allowable emission rates are from the Process Weight Table (PWT) equation in rule 62-296.320(4)(a), F.A.C., or lower limits requested by the applicant to reduce PM PTE. The PWT rule only applies to the kilns, the Raymond Mill and the Ball Mill. There are no applicable (or necessary) PM emission limits for the other emission sources.

³ Actual PM emissions are expected to be significantly less than the potential emissions shown (total expected PM emissions are 9.37 TPY) based on the manufacturers quoted discharge concentration of 0.008 grains/dscf for all of the new baghouse labeled as PJ-X. Also, based on the production limit of 15,000 tons/yr, the kilns and Raymond Mill would only be able to run approximately 3,750 – 5,000 hours/year, rather than the 8,760 assumed above.

⁴ Due to the very low air flow rates (3-20 dscfm) and potential emissions (<0.1 TPY), the bin vent filters (BV) are exempt from permitting in accordance with the Rule 62-4 .040(1) (b), F.A.C. (emissions deemed insignificant) exemption. (These bin vents are the method of venting the silos/hoppers and are not considered emission control devices.)

b. Potential Emissions from Combustion of Natural Gas or Propane in Kiln Combustion Chambers #1 and 2*

Based on 8.0 MMBtu/hr maximum burner heat input rating for each kiln (*as requested on 04/06/09*).

Pollutant	All Nat Gas TPY from each chamber	All Propane TPY from each chamber	Worst Case** TPY from each chamber	Worst Case** Total Combined TPY for both chambers
VOC	0.09	0.18	0.18	0.36
NOx	4.66	6.66	6.66	13.32
SO2	0.02	0.00	0.015	0.04
CO	1.17	1.12	1.17	2.34
PM	0.10	0.21	0.21	0.42

Notes:

* The above potential emissions, except for PM, are also the facility totals for that pollutant (see table in a. above for PM facility total).

** It is expected that the combustion chambers will be fired with natural gas unless there is a curtailment in the natural gas supply. Therefore the above Worst Case and Worst Case Total PTE estimates for NOx, PM and VOC, which are based on 100% propane use, are conservative overestimates of potential (and actual) emissions. Also, based on the production limit of 15,000 tons/yr, the kilns and their combustion chambers) would only be able to run approximately 3,750 – 5000 hours/year, rather than the 8,760 assumed above.

- The combustion chambers are each exempt from permitting in accordance with Rule 62-210.300(3)(a)(34), F.A.C. (Conditional Exemptions -External Combustion Heating Units) on the basis of worst case 8,760 hrs/yr fuel usage (*see below*).

Operation of the kiln combustion chambers for 8,760 hrs/yr (which is not possible given the 15,000 tpy production limit) would result in natural gas usage of 140.2 MMcuft/yr (total both chambers) (70.1 MMcuft/yr for each chamber), or propane usage of 1.47 MMgallons/yr (total both chambers) (0.735MMgal/yr for each chamber); compared to the above conditional exemptions levels of 375 MMcuft/yr (total of all units)(150 MMcuft per unit) for natural gas, and 2.5 MMgal/yr (total of all units) (1.0 MMgal/yr per unit) for propane.

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. Proposed Agency Action

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).