

Permit File 03

# AIR TESTING & CONSULTING

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

May 14, 2010

Danielle Henry  
Department of Environmental Protection  
13051 North Telecom Parkway  
Temple Terrace, FL 33637-0926

Dept. of Environmental Protection  
MAY 14 2010  
Southwest District

Re: Standard Carbon, LLC  
0830170-012-AC  
001

Dear Danielle:

Enclosed are two copies each of the compliance test reports for Standard Carbon, LLC. Testing was performed on May 3, 2010.

- ID No. 005 – Kiln #1 w/Rayjet Baghouse
- ID No. 006 – Raymond Mill w/Mikro-Pulsaire Baghouse  
Raymond Mill Silo w/Mikro-Pulsaire Baghouse
- ID No. 009 – Transfer of activated carbon from Raymond Mill to Carbon Silos w/Baghouse PJ-4
- ID No. 010 – Transfer of carbon to Carbon Silo 14 w/Baghouse PJ-6
- ID No. 011 – Bulk Truck/Railcar loading from Carbon Silo 14 w/Baghouse PJ-6
- ID No. 012 – Transfer of carbon to Bagging System Storage Tower w/Flex-Kleen Baghouse
- ID No. 013 – Carbon Bagging w/Flex-Kleen Baghouse

The following systems were not in operation.

- ID No. 001 – Fly ash truck unloading w/ Baghouse PJ-T
- ID No. 002 – Transfer of fly ash to Silos w/ Baghouse PJ-1
- ID No. 003 – Transfer of fly ash to Kiln Hoppers w/ Baghouse PJ-2
- ID No. 004 – Transfer of fly ash to Kiln Hoppers w/ Baghouse PJ-3
- ID No. 007 – Ball Mill #1 w/Mikro-Pulsaire Baghouse (will be removed from Site and from permit)

- ID No. 008 – Whizzer operation (will be removed from Site and from permit)

Kilns #1 and #2 each has its own stack. Previously, the former owner/operator had both baghouses exhaust through the same stack. So the VE was for Kiln #1 only. Kiln #2 has not operated. Kiln #2 will be scheduled after startup.

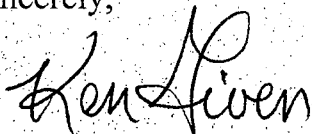
The Raymond Mill Silo baghouse is not listed on the permit. It was an oversight. There will be an Air Construction Permit application submitted for it along with the Air Operation Permit application.

The VE was performed when carbon was transferring from the Bagging Silo to the Bagging Hopper. The bagger was not operating. Another VE will be scheduled when the Bagger is in operation.

The flyash system was not in operation as stated in the permit. The flyash now supplied to the facility is running 70% moisture and cannot be handled by the new unloading, storage and transfer system. The flyash is unloaded onto the pavement. Since it is so wet there is not a dusting problem. Also, to insure there is no problem the piles are covered with tarps and a hose is available to water the piles. The wet flyash is manually taken to Kin #1, raised to a level above flyash Hopper K1 and dumped into the Hopper. The flyash then feeds into the Kiln. This issue will be addressed in the Air Operation permit application.

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

Sincerely,



Kenneth E. Given, P.E.  
President

cc: James Sharpe, Standard Carbon LLC

**Application Routing and Transmittal Sheet (A/C/AO/AF)**

Air Permitting Supervisor – Required Information for Project Setup by Admin			
Owner/(Facility Name, if needed):	Standard Carbon LLC	County:	Marion
Facility ID No.:	new 0830170	Latitude:	29/11/33
Project Name:	initial construction permit	Longitude:	82/26/17
Project Description:	initial construction permit at an existing facility formerly owned by Acticarb Tailored Products LLC		
Facility Type:	<input type="checkbox"/> New <input type="checkbox"/> Relocatable	Total Fee Submitted (\$):	\$6250
Type/Subtype:	AC00	Total Fee Required (\$):	\$6,250
Date Received:	12/15/08	Net Fee Needed (\$):	0
Fee Status:	<input checked="" type="checkbox"/> Correct <input type="checkbox"/> Incorrect <input type="checkbox"/> NA	Net Fee Refund (\$):	0
Fee Checked By:	cz	Fee override reason:	MULTIPLE SOURCES
Date Fee Checked:	12/16/08	(if needed)	

Admin – Project Setup Information			Permit Number:
Project Number:	001	Initial ARMS Entry	0830170-001-AC
Date:	12/16/08	Initials:	LD

Air Permitting Supervisor – Application Information					
Application Assigned To:	Zell_D	No. of Hardcopies:	1	Copies issued to DEP Engineer:	1
Date Assigned:	12/16/08	No. of Disk:	na	Copies issued to County:	na
Confidential Information (Y/N):		EPSAP (Y/N):	n	Copies issued to other:	na

Compliance/Enforcement Review (review marked by supervisor)	
Permit Supervisor – Email sent for application review/comments:	see 0830011-015-AO
Permit Supervisor - Copy of transmittal sheet to Bret Galbraith (new facility)? (Y/N):	n
Permit Supervisor – Draft Permit Review? (Y/ED)	ED

Air Permitting - Permit Transmittal (add initials & date completed)				
	Intent / Draft		Final	
Permit Clock Dates	Day 30: 01/14/09	Day 90: 07/05/09	Day 30: /	Day 90: 07/07/09
Zipfile Name On Air_Common *	0830170.001.ac.d.Std Carbon.zip		0830170.001.ac.f.Std Carbon.zip	
Final Permit Name On Air_Common *	/		.doc	
Engineer → Permit Reviewer	DZJ 4/17/09		DZJ 5/19/09	
Permit Reviewer → Permit Supervisor	cz 4/22/09		cz 5/19/09	
Permit Supervisor → DAPA	Mon 04-24-09		Mon 05-20-09	
DAPA → Clerk/Engineer	04-27-09		05-21-2009	
Permit Package Mailed/ Emailed	04-27-09		05-21-2009	
Arms Event Entry	04-27-09		05-21-2009	
Copy to Interested Party (Y/N)	-		-	
Posted to DEP Website	04-27-09		05-21-2009	
ARMS Inventory Data Entry:	DZJ 6/16/09		Permitting Clerk:	06/18/09

\* Air\_Common\Permitting\Permits\PermitXX\

Air Permitting Supervisor - Data Fields for Access System (add at final Issuance)			
Issue Date:		MACT:	-
Facility Description:	Other	NSPS:	-
Source Description:	Other	FUEL:	ng
296:	PWT	Control Equip.:	baghouses
Project Description / Comments:	Initial Action on activated carbon production facility Incl. nat. gas-fired kilns, and a Raymond Mill.		
Permit Clerk – Permit List Data Entry (Access):	05-21-09		

Special Routing	
Permitting Supervisor – Engineer to send final permit to compliance section (Y/N)	y

<input checked="" type="checkbox"/> Application Log	<input checked="" type="checkbox"/> Fee Verification in ARMS	<input type="checkbox"/> Deadline Check	<input checked="" type="checkbox"/> Project ID
---	--	---	--

Query Coll Rpts Rfnd Exit CRA Window



Cash Receiving Application - Collection Point Log Remittance

CL AREA **SWD** CRAF006A  
Logged Total **\$6,250.00**

**Collection Point Log Remittance**

Remittance ID **807439** Type \* **CP** Received Date \* **12/15/2008** Status **RECEIVED**  
 System Receipt **647475** PNR  Check # \* **1252** Amount \* **6,250.00**  
 SSN/FEID  Name \* **STANDARD CARBON LLC**  
 First  Middle  Title  Suffix   
 Address1 **551 N. U.S. HIGHWAY 41**  
 Address2   
 City **DUNHELLON** ST **FL** Zip **34432**  
 Country  Short Comments **AIR 0830170-001**

**PAYMENT (S)**

Payment ID	CL Area	Code/Description	Payment Amount	Reference#	Appl	Fund *	Grant *	Status
915117	SWD	002222 AIR/CONSTRUCT	\$6,250.00		ARMS	PFTF		COMPLETE

**COMMIT FREQUENTLY** **\$6,250.00** Payment Total

Press <TAB> to accept Collection Point or enter F&A.



Permits Events Payment E/ESTA PA Data Entry Site Facility Permitted EU ME Party Affiliation Lct



Permitting Application - Permit Detail and Log Permit

**ARMS Facility**

**POINT** AIRS ID **0830170** STATUS **U** OFFICE **SWD** SW: TAMPA  
 SITE NAME  COUNTY **MARION**  
 OWNER/COMPANY **STANDARD CARBON LLC**

**Project**

AIR Permit #  -  -  Project # **001** CRA Reference # **328431**  
 Permit Office **SWD (DISTRICT)** Agency Action **Pending** OGC   
 Project Name **INITIAL CONSTRUCTION PERMITAT** Desc **an existing facility formerly owned by Acticarb Tailored Products LLC**  
 Type/Sub/Des **AC** / **00** **Multiple Sources per Application** Logged **12/16/2008**  
 Received **12/15/2008** Issued  Expires  Application Action **NEW**  
 Fee **6250.00** Fee Recd **6250.00** Dele  Override **MULTIPLE SOURCE**

**Related Party**

Role **APPLICANT** Begin **12/16/2008** End   
 Name **SHARPE, JAMES** Company **STANDARD CARBON LLC**  
 Address **551 NORTH U.S. HIGHWAY 41**  
 City **DUNHELLON** State **FL** Zip **34432** Country **U.S.A.**  
 Phone **917-583-0834** Fax **561-624-5447**

**Processors**

Processor **STUBBS\_D** *X zellud* **Y** Active **12/16/2008** Inactive  Events

Enter Project Name.



125

**STANDARD CARBON LLC**

551 N US HIGHWAY 41  
DUNNELLON, FL 34432

JPMORGAN CHASE BANK, N.A.  
NEW YORK, NEW YORK  
1-2-210

12/12/2008

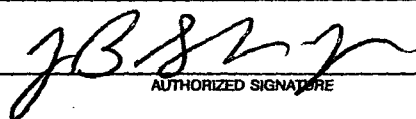
PAY TO THE ORDER OF FL Dept of Environmental Protection

\$ \*\*6,250.00

Six Thousand Two Hundred Fifty and 00/100

DOLLA

FL Dept of Environmental Protection  
13051 N Telecom Parkway  
Temple Terrace, FL 33637

  
AUTHORIZED SIGNATURE

MEMO

⑈001252⑈ ⑆021000021⑆

799795745⑈

*air*  
*12/15*

Permitting Application - Permit Detail and Log Permit			
<b>ARMS Facility</b>			
POINT	AIR ID 0830170	STATUS U	OFFICE SWD SW-TAMPA
SITE NAME STANDARD CARBON, LLC		COUNTY MARION	
OWNER/COMPANY STANDARD CARBON, LLC			
<b>Project</b>			
AIR Permit #	Project # 001	CRA Reference # 328431	
Permit Office SWD (DISTRICT)	Agency Action Pending	OGC	
Project Name INITIAL CONSTRUCTION PERMIT	Desc an existing facility formerly owned by Acticarb Tailored Products LLC		
Type/Sub/Des AC / 00	Multiple Sources per Application		Logged 12/16/2008
Received 12/15/2008	Issued	Expires	Application Action NEW
Fee 6250.00	Fee Recd 6250.00	Dele	Override MULTIPLE SOURCE
<b>Related Party</b>			
Role APPLICANT	Begin 12/16/2008	End	
Name SHARPE, JAMES	Company STANDARD CARBON LLC		
Address 551 NORTH U.S. HIGHWAY 41			
City DUNNELL OH	State FL	Zip 34432	Country U.S.A.
Phone 917-583-0834	Fax 561-624-5447		
<b>Processors</b>			
Processor ZELL D	Y	Active 12/22/2008	Inactive
Events			

**MEMORANDUM**

**TO:** Mara Grace Nasca  
District Air Program Administrator

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

**FROM:** David Zell *DZ*  
Air Permitting Engineer

**DATE:** 04/16/09

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

**DAY 90:** 07/07/09

The Intent to Issue Public Notice for the above permit was published in the Star-Banner (Ocala) on 05/04/09. A proof of publication was received on 05/15/09 (received copy attached to email on 05/12/09). I have reviewed the proof of publication and verified that the correct notice was published. No comments or petitions have been received.

I recommend issuance of this final permit, which is identical to the draft permit approved by this office as part of the Notice of Intent package.

# **AIR TESTING & CONSULTING**

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

May 13, 2009

Dept. of Environmental Protection

MAY 15 2009

Southwest District

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

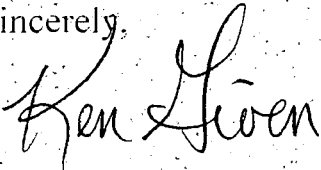
**Re: Standard Carbon, LLC**  
**Facility ID: 0830011**

Dear Cindy:

Enclosed is the Affidavit of Publication from the Star-Banner in Ocala as proof of publication of the Public Notice of Intent to Issue Air Permit for Standard Carbon LLC.

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

Sincerely,



Kenneth E. Given, P.E.  
President

cc: James Sharpe, Standard Carbon LLC



# AFFIDAVIT OF PUBLICATION

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

Dept. of Environmental Protection

MAY 15 2009

Southwest District

STATE OF FLORIDA  
COUNTY OF MARION

Before the undersigned, a Notary Public of Said County and State, [Signature] 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 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 i**

was published in said newspaper in the issues of:

5/4 1x

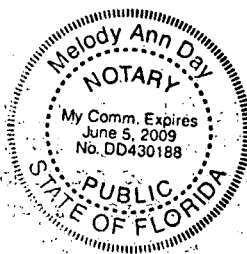
Affiant further says that the said STAR-BANNER is a daily newspaper published at Ocala, in said Marion County, Florida, and that the said newspaper has heretofore been continuously published in said Marion County, Florida, daily, and has been entered as second class mail matter at the post office in 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 8<sup>th</sup> day of May, A.D., 2009

[Signature]  
Notary Public  
Melody Ann Day

(Print, Type or Stamp Name of Notary Public)

Ad #: A000553169



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.

The Department will issue the final 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.

Mediation is not available in this proceeding.

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, 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 petitioner 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.

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.

May 4, 2009

**Zell, David**

---

**From:** Zhang-Torres  
**Sent:** Tuesday, May 12, 2009 11:54 AM  
**To:** Zell, David  
**Subject:** FW: Emailed affidavit. Hope this helps. Maile out secondoriginal in morning. TThanks  
**Attachments:** pic07157.gif; DOC001.PDF

This is for you.

Cindy

---

**From:** Henry, Danielle D.  
**Sent:** Tuesday, May 12, 2009 10:57 AM  
**To:** Zhang-Torres  
**Subject:** FW: Emailed affidavit. Hope this helps. Maile out secondoriginal in morning. Thanks

Is someone from your staff looking for this?

---

**From:** ken@airtest.fdn.com [mailto:ken@airtest.fdn.com]  
**Sent:** Tuesday, May 12, 2009 9:54 AM  
**To:** Henry, Danielle D.  
**Cc:** Hughes, Rhonda; Jim Sharpe  
**Subject:** Fwd: Emailed affidavit. Hope this helps. Maile out secondoriginal in morning. Thanks

Nelda Scalici  
Classified Account Executive

Star Banner - Ocala/Gainesville Media  
New York Times Regional Media Group  
Office: 352-867-4096  
Fax: 352-867-4053  
[nelda.scalici@starbanner.com](mailto:nelda.scalici@starbanner.com)  
Visit us on the web at [ocala.com](http://ocala.com)  
for advertising rates go to: [ocala.com/ratecard](http://ocala.com/ratecard)

----- Forwarded by Nelda Scalici/REGIONAL/NYTIMES on 05/12/2009 09:42 AM -----

**DoNotReply@starbanner.com**

05/12/2009 10:40 AM  
Please respond to DoNotReply

To: "[nelda.scalici@starbanner.com](mailto:nelda.scalici@starbanner.com) "  
<[nelda.scalici@starbanner.com](mailto:nelda.scalici@starbanner.com)>

cc:  
Subject: Scan from a Xerox WorkCentre

Please open the attached document.

Sent by: Guest [DoNotReply@starbanner.com]

Number of Images: 2

Attachment File Type: PDF

WorkCentre Location: The Ocala Star-Banner

Sent from Ocala Star-Banner.

Any problems please contact

IT department at: 352.867.4046

*(See attached file: DOC001.PDF)*

# 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, *[Signature]* 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

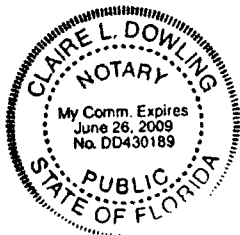
***PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION DEP File No. 0830170-001-  
AC Standard Carbon LLC Dunnellon Facility Marion County The Department of  
Environmental Protection Department gives notice of i***

was published in said newspaper in the issues of:

5/4 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 12<sup>th</sup> day of May, A.D., 2009



*Claire L. Dowling*  
Notary Public

CLAIRE L. DOWLING  
(Print, Type or Stamp Name of Notary Public)

Ad #: A000553169

**PUBLIC NOTICE OF INTENT TO ISSUE  
AIR PERMIT**

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL  
PROTECTION  
DEP File No. 0830710-001-AC  
Standard Carbon LLC  
Dunnellon Facility  
Manatee 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, Manatee 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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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 this agency decision;

(d) A statement of all disputed issues of material fact. If there are none, the petitioner 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.

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 Maria Grace Nasco, Southwest District Air Program Administrator, at 13051 North Telecom Parkway, Temple Terrace, Florida, or call 813-832-7600, 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 this 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 Maria Grace Nasco (phone no. 813-832-7600) 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.  
May 4, 2009

## Zell, David

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**From:** ken@airtest.fdn.com  
**Sent:** Thursday, April 16, 2009 5:57 PM  
**To:** Zell, David  
**Subject:** Re: FW: Pre-Draft of Facility Description for Standard Carbon(0830170-001-AC)

Dave,

It looks good to me.

Ken Given

Quoting "Zell, David" <[David.Zell@dep.state.fl.us](mailto:David.Zell@dep.state.fl.us)>:

> My first attempt at sending you this message bounced back - must have  
> been an old email address in my contact list. I'll try again with this address.

>

>

>

> Dave

>

>

>

> From: Zell, David

> Sent: Tuesday, April 14, 2009 4:34 PM

> To: Ken Given (airtest@verizon.net)

> Subject: Pre-Draft of Facility Description for Standard Carbon  
> (0830170-001-AC)

>

>

>

> Ken,

>

>

>

> If you have a chance, could you look at the attached pre-draft of the  
> facility description for Standard Carbon and let me know if you see  
> any corrections, changes, clarifications, or additions that need to be made.

>

>

>

> I will be off tomorrow, so I won't be able to work on it again until  
> Thursday.

>

>

>

> Thanks,

>

>

>

> Dave

>

> David Zell

> FDEP SWD District (Tampa)

> Air Permit Engineer

>

> PHONE: 813-632-7600 extension 118

*Question asked during 3/31/09  
phone call to  
Ken Owen of  
Air Testing &  
Consulting.*  
*KJ*

**Questions for Standard Carbon Draft Permit (Project 0830170-001-AC)**

(Questions came up while writing facility description and drafting permit conditions.)

**Send responses via email**

Is there currently any construction or renovation going on at the facility?

Point out errors in PM Emissions Table

Include possible future Fly Ash Storage Silo No. 5 in AC ?

Are blowers (BL-1 through BL-5) variable speed or are they On/Off? Do we need to specify TPH transfer rates to be achieved during VE testing or just that transfer operation are conducted because the rate is basically always the same? (would be 20 TPH for fly ash silos, 4 TPH for Kiln FA Hoppers)

Can more than one silo be loaded/transferred to at a time or just one at a time? What is worst case operating scenario to be specified for VE testing? (if more than one can be loaded at a time, are TPH rates shown per silo or total transfer rate for all silos?)

(Question applies to Fly Ash Storage Silos, Kiln Fly Ash Hoppers, and Carbon Silos )

Do the kiln combustion chambers have separate emission stack(s) from the kilns themselves? Separate stack for each combustion chamber?

What maximum process rates should be included in the permit as limits:

- to limit facility PTE:

175,200 TPY of fly ash received or **activated carbon product produced**

- for purposes of making sure VE testing done at representative/worst case conditions:

What are dirtiest parts of process?

- unloading operations (20 TPH)
- kiln operation (4 TPH) (is 4 TPH total for both kiln or for each?)
- Raymond Mill/Ball Mill (4.0 TPH and 2.0 TPH)
- Whizzer (1.0 TPH)
- Bulk loading of trucks/railcars (20 TPH)



Where does Ball Mill No. 1 discharge to? (Same Outlet Hopper as Raymond Mill?)

What is Raymond Mill reject (oversize carbon?). How and where is it separated out?

Is there also Ball Mill reject that goes to the Whizzer?

What is the Whizzer – what does it do and how?

Is there truck and railcar bulk loading of carbon product (Page 70 of application), or just truck (as application indicates in most other places)? If railcar too, is the same Roto Lock loading system used?

Does truck (railcar) bulk loading only occur from Carbon Silo 14 (which is positioned over railroad tracks)?

What control device controls emissions from bulk truck (railcar) loading – PJ-6 above Carbon Silo 14 or Bin Vent BV-5, the bin vent for Carbon Silo?

Can carbon product be transferred to Bagging Storage Tower at the same time the Bagging Unit bagging machines are being operated? (If so that would be worst case for VE testing.)

Are the two Bagging Machines manually operated?



# 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

January 13, 2009

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

RE: Request for Additional Information  
Air Construction Permit Application for Standard Carbon LLC Dunnellon Facility  
(DEP Project No. 0830170-001-AC)

Dear Mr. Sharpe:

On December 15, 2008, the Department received your air pollution construction permit application for the activated carbon plant located at 551 North Highway 41 in Dunnellon, Marion County. In order to continue processing the application, the Department will need the following additional information pursuant to Rule 62-4.055(1), F.A.C.

1. Applicability of Process Weight Table - Rule 62-296.320(4)(a), F.A.C. particulate matter (PM) emission limits based on the Process Weight Table (PWT), and associated formulas contained in that rule, apply only to "any emissions unit which processes raw materials to produce a finished product through a chemical or physical change..." For the purposes of this facility, the only equipment/processes to which the PWT rule applies are the Dryer, the three (3) Kilns, the Raymond Mill and the Ball Mill. These are the only processes/activities in which a physical or chemical change takes place to the raw material. The other PM emission sources at this facility, (bulk truck loading and unloading, material storage silos/hoppers, bagging operations, etc.) are not subject to this rule, nor any other rule specifically limiting PM emissions. For the purposes of estimating potential PM emissions (PM PTE) for the facility from the emission sources subject to the PWT, the PWT PM limit must be used to calculate PM PTE, unless an alternative lower limit is requested (as you have done for those sources). For sources not subject to the PWT rule, PM PTE for baghouse controlled sources would be based on the baghouse manufacturer's guaranteed outlet PM concentration (gr/dscf) and the design air flow rate (dscfm). Please revise the Particulate Matter (PM) Emissions Table included as an attachment to the application to reflect the above PWT rule applicability and PTE calculation methodology. (See below for other requested revisions to the PM Emissions Table.)

(Visible Emissions (VE) Limitation Note - For sources to which the PWT rule applies (or have a lower requested PM limit) that are controlled by a baghouse, an alternate 5% opacity VE limit will be established in lieu of PM compliance stack testing (Rule 62-297.620(4), F.A.C.), with annual VE compliance testing required. For sources not subject to the PWT rule or any other PM limit, the Rule 62-296.320(4)(b), F.A.C. General Visible Emissions Standard of 20%

opacity would apply, with no specific annual VE compliance testing requirement. (A 5% opacity indicator standard will be applied to these baghouse to assure good operation and maintenance in accordance with Rule 62-210.650, F.A.C. - Circumvention of Control Devices.)

2. Fly Ash Silo No.1 – The first page of the Project Overview attachment states that Flyash Storage Silo Nos. 1, 5 and 7 will be removed. There is no mention of installation of a new Flyash Silo No.1. However, on the 2<sup>nd</sup> page of the Project Overview, as well as Process Flow Figure 2 and Page 11 of the application, there are references to Silo No. 1. Please explain and make revisions if necessary.
2. All of the following items relate to review of the Process Flow Figures, and the Particulate Matter (PM) Emissions Table attachment
  - a. There are three (3) Pulse Jet baghouses (PJ) shown on Figures 1 and 2. None of them has a PG identification number (PJ-1, PJ-2, etc.) shown. It does not appear that all three of these PJ's are included in the PM Emissions Table. It seems that perhaps there should be two PJ's associated with It Bulk Truck Unloading (PJ-1 and PJ-2, based on Page 11 of the application and the Project Overview attachment). Please explain and make revisions if necessary.
  - b. Figure 4 shows a separate RayJet baghouse for each of the three (3) kilns (as does the application), but the PM emissions table has one line for Kilns Nos. 1 and 2 (and seems to indicate only one Ray Jet baghouse), and a separate line (and RayJet baghouse) for Kiln No. 3. Why are Kiln Nos. 1 and 2 not shown on separate lines with separate baghouses and PM emission estimates/limits? Please explain and make revisions if necessary.
  - c. In the PM Emissions Table, the EXPECTED emissions for the Kiln Hoppers (0.06 lb/hr and 0.27 TPY) appears to be for only one baghouse, whereas Figure 4 (and the Project Overview) shows that there are three (3) baghouses (assumed to be Baghouses PJ-3, PJ-4 and PJ-5 based on the PM Emissions Table). How are emissions from all 3 baghouses accounted for? Please explain and make revisions if necessary.
  - d. Figure 5 shows a Pulse Jet (no PJ identification number is shown) which controls the transfer of material from the Raymond Reject Hopper to the Whizzer Receiving Hopper. This PJ baghouse does not appear to be included on the PM Emissions Table. Please explain and make revisions if necessary.
  - e. The PM Emissions Table shows two baghouses identified as PJ-5 (under EXPECTED, see Baghouse for the Kiln Hoppers, and for Carbon Storage). Please explain and make revisions if necessary.
  - f. Bulk Truck Unloading (shown as controlled by Baghouse PJ-7 on the PM Emissions Table) is not identified (nor is PJ-7) on any of the Process Flow Figures (is it on the right center of Figure 5?). Please explain and make revisions if necessary.

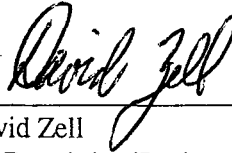


Standard Carbon LLC  
Dunnellon, FL  
DEP Project 0830011-001-AC

Page 4 of 4

If you have any questions, please call me at (813) 632-7600 extension 118, or contact me via email at [david.zell@dep.state.fl.us](mailto:david.zell@dep.state.fl.us). If you feel it would assist in addressing the issues raised in this letter, please feel free to email or call me to schedule a meeting at the Southwest District office.

Sincerely,



---

David Zell  
Air Permitting Engineer  
Southwest District Office

DRZ/

copy to:

Mr. Kenneth E. Given, P.E.  
Air Testing & Consulting, Inc.  
Tampa, FL 33619