



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

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DRAFT PERMIT

PERMITTEE

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

Authorized Representative:
Mr. James Sharpe, CEO

Air Permit No. 0830170-008-AC
Permit Expires: 06/30/2014
Site Name: Activated Carbon Production
Facility
Minor Source Air Construction
Project Name: Install New Baghouse

This is the draft air construction permit, which authorizes installation of a new material transfer Emission Unit and baghouse. The proposed work will be conducted at the Standard Carbon LLC, activated carbon production facility (Standard Industrial Classification No. 2819). The facility is located in Marion County at 551 North US Highway 41 in Dunnellon, Florida. The UTM coordinates are Zone 17, 360.2 km East, and 3230.0 km North.

This final permit is organized by the following sections:

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Facility-wide and Emissions Unit Specific Conditions
- Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C., and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C., for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of the final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by

SECTION 1. GENERAL INFORMATION (DRAFT)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This facility produces activated carbon using recovered fly ash as a raw material. Raw material in the form of fly ash (from coal or wood combustion) is received at the facility and fed into indirectly heated kilns for conversion into activated carbon (carbon). The carbon from the kiln is transported to a Raymond Mill for grinding and sizing into desired product size. Powdered activated carbon produced offsite is also received at the facility in large supersacks and unloaded to silos for mixing with the carbon produced at the facility to produce final carbon product to meet customer specifications. Finished carbon product is transferred to loading silos and loaded to covered trucks or railcars for final shipment.

The existing facility consists of the following emissions units.

Facility ID No. 0830170	
ID No.	Emission Unit Description
001	Flyash/Powdered Activated Carbon Unloading (current Baghouse DC-1 being modified under this construction permit)
002	Material Transfer to Fly Ash/Carbon Storage Silo Nos. 9 and 11 (Baghouse DC-2)
003	Material Transfer to Kiln Fly Ash Feed Hoppers K1 (for Kiln No. 1) and K2 (for Kiln No. 2) (currently not operating - no baghouse)
004	Kiln No. 2 (inner drying chamber, Baghouse K2BH)
005	Kiln No. 1 (inner drying chamber Baghouse K1BH)
006 ¹	Raymond Mill No. 1 and Raymond Mill No. 1(Outlet Hopper Baghouse RM1BH)
007 ¹	Kiln Surge Hopper, Shaker Screen, and Raymond Mill No. 1 Receiving Hopper (current Baghouse DC-4 being replaced under this construction permit)
009 ¹	Material Transfer to Carbon Storage Silo Nos. 8, 10 and 12 (Baghouse BV-5)
010	Material Transfer to Carbon Storage Silo No. 14 (Baghouse DC-6)
011	Bulk Truck/Railcar Loading (Baghouse 16 Tank)
012	Material Transfer to Carbon Bagging Storage Tower (Baghouse BH)
013 ¹	Material Transfer to Carbon Bagging Hopper, and to Bagging Unit (Baghouse Mahle)
014	Material Transfer to Carbon Storage Silo No. 16 (Baghouse 16 Tank)
015	Kiln No. 1 Combustion Chamber
016	Kiln No. 2 Combustion Chamber
017	Material Transfer to Carbon Storage Silo No. 4 (Baghouse DC-5)
018 ²	Kiln No. 3 (inner drying chamber, Baghouse SDC)
019 ²	Kiln No. 3 Combustion Chamber
020 ²	Raymond Mill No. 2 Receiving Hopper (Baghouse Kinetic Air Model 12)

SECTION 1. GENERAL INFORMATION (DRAFT)

021 ²	Raymond Mill No. 2 and Raymond Mill No. 2 Outlet Hopper (Baghouse Mikro-Pulsaire)
022 ²	Material Transfer from Raymond Mill No. 2 to Carbon Storage Silo Nos. 2, 3, 4, 6, 8, 10, 12 or 18 (Baghouse Mikro-Pulsaire)

Note:

1. Emission units being modified as described in Construction Permit 0830170-006-AC, dated 05/21/12.
2. New emission units as described in Construction Permit 0830170-006-AC, dated 05/21/12.

Project Description and Affected/Proposed Emission Units

This project will create the following emissions unit.

Facility ID No. 0830170	
ID No.	Emission Unit Description
023	Material Transfer to Activated Carbon Storage Silo No. 1. A new pneumatic transfer line from the powdered activated carbon storage hoppers will be connected to existing, unused Silo No. 1. A new baghouse, a Kinetic Aire Model 12-RS-84, will be installed on Silo 1 to control dust emissions.

NOTE: Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C., Prevention of Significant Deterioration, F.A.C.
- This facility is a synthetic non-Title V source for particulate matter (PM) and is required to use air pollution control equipment (i.e., baghouse PM emission control devices) such that the facility's PM emissions are less than the threshold limits required for the facility to be considered a major source per Chapter 62-213, F.A.C.

PERMIT HISTORY/AFFECTED PERMITS

This facility is currently permitted under Air Operation Permit No. 0830170-007-AO, dated 7/2/12. Construction Permit 0830170-006-AC, dated 5/21/12, also authorizes additional modifications and emission unit construction to this facility.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection, Central District Waste & Air Resource Programs. The Central District's mailing address and phone number is:

Florida Department of Environmental Protection
Central District Office
Waste & Air Resource Programs
3319 Maguire Blvd., Ste. 232
Orlando, FL 32803-3767
Telephone: 407-897-4100

All documents related to applications for permits shall be submitted to the above address or electronically to the following address: **DEP_CD@dep.state.fl.us**. In any electronic submittal clearly identify the Air Permit No. 0830170-008-AC.

2. Compliance Authority: The compliance authority for this project is the Florida Department of Environmental Protection, Central District Compliance Assurance Program. All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Compliance Assurance Program. (Use the above mailing or e-mail address).
3. Appendices: The following Appendices are attached as part of this permit:
 - a. Appendix A. Citation Formats and Glossary of Common Terms;
 - b. Appendix B. General Conditions;
 - c. Appendix C. Common Conditions; and
 - d. Appendix D. Common Testing Requirements.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]
6. Modifications: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

7. Annual Operating Report: 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 must be submitted electronically in accordance with the instructions received with the AOR package sent by the Department. [Rule 62-210.370(3), F.A.C.]
8. Application for Non-Title V Air Operation Permit Revision: This permit authorizes modification of the permitted emissions units and initial operation to determine compliance with Department rules. A Non-Title V air operation permit revision is required for continued operation of the permitted emissions units. The permittee shall apply for a modification to the Non-Title V air operation permit 0830170-007-AO at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation of emission unit 023. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a modification of the Non-Title V air operation permit 0830170-007-AO, the applicant shall submit the following:
- 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/>;
 - the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;
 - copies of the initial visible emission (VE) compliance test report required by Specific Condition No. **A.10**, if not previously submitted; and,
 - copies of the most recent two months of records/logs specified in Specific Condition No. **E.6. of Operation Permit 0830170-007**.

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU No 023 - Material Transfer to Activated Carbon Storage Silo No. 1

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
023	<p>Material Transfer to Activated Carbon Storage Silo No. 1. Powdered activated carbon from off-site is received in very large bags (super sacks) in the Unloading Building (EU 001) and dumped/unloaded into two of the receiving hoppers. From the receiving hoppers, the powdered activated carbon is pneumatically transferred to Flyash/Carbon Storage Silo Nos. 9 and 11 (EU No. 002) or to Carbon Storage Silo Nos. 8, 10 and 12 (EU No. 009).</p> <p>A new pneumatic transfer line from the powdered activated carbon storage hoppers will be connected to existing Silo No. 1. Material transfer will be conveyed by an existing blower operating at a fixed air flow rate of 600 cubic feet per minute (cfm). A new baghouse, a Kinetic Aire Model 12-RS-84, will be installed on Silo 1 to control dust emissions.</p>

PERFORMANCE RESTRICTIONS

- A.1. Permitted Capacity: This construction permit does not change the permitted capacity of the facility. As stated in 0830170-007-AO, the production of activated carbon product from this facility shall not exceed 15,000 tons in any 12 consecutive month period.
- A.2. Restricted Operation: The hours of operation are not limited (8,760 hours per year). [Rules 62-4.070(3) and 62-210.200(247) “Potential to Emit”, F.A.C.]

EMISSIONS STANDARDS

- A.3. Visible Emissions (VE): Visible emissions from each material handling and storage silo baghouse source are limited to less than 5 percent (5%) opacity. [Amended Permit Application received 05/09/2013; Rule 62-296.320(4)(b), and Rule 62-297.620(4), F.A.C.]

{Permitting Note: This lower visible emission standard is accepted by the applicant in lieu of annual compliance testing requirements for particulate emissions. However, annual visible emission testing is required .}

TESTING REQUIREMENTS

- A.4. Initial Compliance Tests: The emissions unit shall be tested to demonstrate initial compliance with the emissions standards for Visible Emissions specified in Specific Condition **A.3**. The initial tests shall be conducted no later than 90 days after initial operation of the unit. Testing of emissions from this material transfer operation shall be conducted during silo loading conditions that are the representative of the normal transfer operation of activated carbon from the storage hoppers to the existing Silo No. 1 at a rate of 600 cfm.

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU No 023 - Material Transfer to Activated Carbon Storage Silo No. 1

[Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]

- A.5. Compliance Tests After Initial Testing: During each federal fiscal year (October 1st to September 30th), the emissions unit shall be tested to demonstrate compliance with the emissions standards for Visible Emissions specified in Specific Condition **A.3**. Testing of emissions from this material transfer operation shall be conducted during material transfer/silo loading conditions that are the representative of the normal transfer operation of activated carbon from the storage hoppers to the existing Silo No. 1 at a rate of 600 cfm.
[Rule 62-297.310, F.A.C.]
- A.6. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]
- A.7. Test Method(s): Required tests shall be performed in accordance with the following reference method(s).

Method(s)	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources The Method 9 VE compliance tests 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

The above method is described in Appendix A of 40 CFR 60 and has been adopted by reference in Rule 62-204.800, F.A.C. No other method may be used unless prior written approval is received from the Department.

[Rules 62-204.800 and 62-297.401, F.A.C.; and Appendix A of 40 CFR 60]

NOTIFICATION REQUIREMENTS

- A.8. Test Notification: The permittee shall notify the Compliance Authority at least 15 days prior to any required tests. 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 the telephone number of the person conducting the test.

{Permitting Note: The notification should also include the relevant emission unit ID No That is, Emission unit 023}, test method to be used, and pollutants to be tested. }

[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

A. EU No 023 - Material Transfer to Activated Carbon Storage Silo No. 1

- A.9. Notification of Operation Commencement: The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the EU No. 023, no later than five (5) business days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rule 62-4.070, F.A.C., and Rule 62-210.200, F.A.C., (Definition of Commence Operation)]

RECORDS AND REPORTS

- A.10. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit (that is, the required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed). All test reports shall include a description of the material transfer operations that were being done during the test period and a statement of whether they represented normal operating conditions.
[Rule 62-297.310(8), F.A.C.]

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