TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

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

Facility ID No. 0830170

PROJECT

Project No. 0830170-008-AC
Application for Minor Source Air Construction Permit
Project Name: Install New Baghouse

COUNTY

Marion County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Waste and Air Resource Programs
Central District Office
Orlando, Florida 32803-3767

May15, 2013

Prepared by Stephen Amirault

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

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

I. Project Description:

A. Applicant:

Mr. James Sharpe, Chief Executive Officer
Standard Carbon LLC
551 North U.S. Highway 41
Dunnellon, FL 34432
jsharpe@standardpurification.com

B. Professional Engineer:

Mr. Kenneth E. Given, P.E.
Air Testing & Consulting, Inc.
333 Falkenburg Road, Suite B-214
Tampa, Florida 33619
ken@airtest.fdn.com

C. Project Location:

551 North U.S. Highway 41
Dunnellon, FL 34432

D. Project Summary:

This is an Air Construction Permit which authorizes installation of a new material transfer Emission Unit and baghouse.

D. Application Information:

Application Received on: 04/01/2013
Additional Information Requested on: 04/30/2013
Additional Information Received on: 05/09/2013
Application Complete: 05/09/2013

III. PSD Applicability for Project

As provided in the application, the total project emissions will not exceed the PSD significant emission rates; therefore, the project is not subject to the PSD preconstruction review.

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. – Stationary Source, General Requirements	Y	Not exempt from general permitting requirements
Rule 62-212.400, F.A.C. – Prevention of Significant Deterioration	N	Facility is not a PSD major source
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Activated carbon production operations are a source of unconfined particulate matter emissions.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	N	There is no applicable source category.

Subject to:	Y/N	Comments
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	There is no applicable source category.
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	There is no applicable source category.
Rule 62-213, F.A.C. – Operation Permits for Major Source of Air Pollution	N	Facility is a synthetic minor source.

III. Summary of Emissions

As provided by the applicant, emissions from the additional material transfer line are expected to remain below the following values:

Pollutant	EU No. and brief description	Potential Emissions (tpy)	Allowable Emissions (tpy)
PM	EU 023 - Material Transfer to Activated Carbon Storage Silo No. 1	Less than 0.18[1]	Less than 0.18
VE	EU 023 - Material Transfer to Activated Carbon Storage Silo No. 1		Less than five percent (5%) opacity[2]

1. *Calculation based on exhaust grain loading emission factor of 0.008 gr/dscf and material transfer rate of 600 cubic feet per minute as provided in amended permit application dated 05/09/2013.*
2. *The lower visible emission standard is requested and accepted by the facility in amended permit application dated 05/09/2013, in lieu of compliance testing requirements for particulate emissions. However, annual visible emission testing is required.*

IV. Federal NSPS and/or NESHAP Provisions

There are no applicable federal NSPS or NESHAP provisions.

V. 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.

VI. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer, Stephen Amirault, at the Florida Department of Environmental Protection, Waste & Air Resource Programs, Central District Office, 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803-3767, 407/897-4100.

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 operate the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).