

September 14, 2023
ECT Project No. 230584.0100

Ms. Ginger Adair
Environmental Management Director
Volusia County Environmental Management Department
123 W. Indiana Avenue
Deland, Florida 32720

Re: Belvedere Terminals Company, LLC
874 Hull Avenue
Ormond Beach, FL 32174
Facility ID: AIR_1270233
Volusia County Contract: RSQ No. 20-SQ-10TF
Task Assignment 19

Dear Ms. Adair:

Environmental Consulting & Technology, Inc. (ECT) is submitting this cover letter attached to the report from our consultant, Quadratic Consulting, LLC, regarding their review of the initial air construction permit application prepared by Trinity Consultants dated March 30, 2023, and the final air construction permit issued by the FDEP on August 1, 2023, for content and accuracy.

Quadratic Consulting, LLC also reviewed the email from the City of Ormond Beach and determine whether the Belvedere facility should be permitted as a "minor" or whether it would qualify under 62-110.106(2), (3), (4), (5), or (6) FAC, as subject to additional public notice requirements. If the minor permit is appropriate, and to determine if the facility (as described in the DEP application), meets the technical requirements to obtain the permit as issued.

ECT has reviewed the attached report and agrees with the closing statements as prepared by Quadratic Consulting, LLC.

Should you have any questions, or require any additional information, please do not hesitate to contact either of the undersigned at (407) 903-0005.

Sincerely,
ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.



Jeffrey J. Peters, P.G.
Principal Scientist
jpeters@ectinc.com



Gregory S. Sattler, P.E.
Senior Engineer
gsattler@ectinc.com

Attachment – Report from Quadratic Consulting, LLC.



September 14, 2023

Mr. Jeffrey Peters
Principal Scientist
Environmental Consulting & Technology, Inc.
3751 Maguire Blvd. Suite 234
Orlando, Florida 32803
Via jpeters@ectinc.com

Subject: Review of Air Construction Permit and Application for Belvedere Terminals Company, LLC

Dear Mr. Peters:

Belvedere Terminal Company, LLC (Belvedere) is proposing to construct a greenfield refined products terminal in Ormond Beach, FL (Ormond Beach Terminal). Quadratic Consulting, LLC (Quadratic Consulting) is providing a review of the air construction permit application, the air construction permit issued, and the public notice for content and accuracy for the Ormond Beach Terminal.

Air Construction Permit

An air construction permit application was submitted on March 02, 2023, for the construction of the Ormond Beach Terminal in Volusia County. The application included a thorough evaluation of the potential air emission estimates from the facility based on the proposed emission sources. The facility is classified as a minor source since it is below 100 tons per year (tpy) for any air pollutants, and below 10 tpy for any single hazardous air pollutants (HAP), and 25 tpy for any combination of HAP.

A comprehensive analysis of applicable federal and state regulations was included in the air construction permit application. The analysis discussed several federal and state regulations the facility and/or emission source was subject to. These applicable federal and state requirements are reflected in the air construction permit issued by the Florida Department of Environmental Protection (FDEP).

Public Notice

A public notice is required to be published prior to the issuance of an air construction permit in accordance with 62-210.350, F.A.C. The public notice must be published in accordance with the applicable provisions of Rule 62-110.106, F.A.C. The Ormond Beach Terminal was subject to 62-110.106(5), F.A.C., which requires the person publishing a notice shall do so at his own expense in the legal advertisement sections of a newspaper of general circulation (i.e., one that meets the

requirements of Sections 50.011 and 50.031, F.S.) in the county or counties in which the activity will take place or the effects of the Department's proposed action will occur, and shall provide proof of publication to the Department within seven days of the publication.

Belvedere published a public notice in the Hometown News Media Group – Ormond Beach newspaper on July 7, 2023. The Hometown News Media Group newspaper meets the requirements of 50.011, F.A.C., as it publishes once a week and contains at least 25 percent of its words in the English language. This newspaper is readily available to the public and distributed throughout Daytona Beach, Holly Hill, Ormond Beach, and surrounding areas with more than 10 publicly accessible outlets. The newspaper has been in existence for more than 2 years and meets the requirements of 50.011, F.S., therefore the newspaper meets the requirements of 50.031, F.S.

FDEP received the proof of publication on July 13, 2023, which is within the seven days of the publication requirement.

Closing

In my professional opinion, Belvedere submitted a complete air construction permit application and met applicable FDEP requirements for obtaining an air construction permit. The public notice requirements, as provided in 62-210.106, F.A.C., were also met with the publication in the Hometown News Media Group – Ormand Beach.

Sincerely,

A handwritten signature in blue ink that reads "Ch Schaub". The signature is fluid and cursive, with the first name "Ch" and the last name "Schaub" clearly visible.

Christine Schaub, P.E.
President

Enclosure:

1. Resume

CHRISTINE SCHaub, P.E.

Satellite Beach, Florida 32937 ♦ 3212717087 ♦ cschaub@quadraticconsultingllc.com

♦ **LinkedIn:** [Christine Schaub, P.E. | LinkedIn](#)

PROFESSIONAL SUMMARY

Experienced air permitting and compliance specialist with over 9 years of experience completing air permitting and compliance projects for a variety of industries throughout the United States. Extensive experience with New Source Performance Standard (NSPS) and National Emissions Standards for Hazardous Air Pollutants (NESHAP). Air permitting experience in the following states: AL, CA, DC, FL, GA, KY, LA, IL, MD, MI, NJ, NM, NC, OH, PA, UT, TN, TX, VA, and WV.

SKILLS

Minor, Title V, NSR, and PSD permitting
Potential to Emit Emission Estimates

Regulatory Review
Annual emission inventory reporting

WORK HISTORY

President/Air Permit Engineer, 02/2023 - Current

Quadratic Consulting, LLC – Satellite Beach, FL

Responsibilities include the following:

- Creation of detailed emission calculations for a variety of facilities.
- Preparation of minor and Title V permit applications for a variety of sites and projects, including permit renewal applications. Preparation of these applications can include evaluating regulatory applicability for existing and proposed equipment and equipment modifications, preparing detailed BACT, and interacting with client sites to obtain data needed to complete the emission calculations and application forms, and text.
- Working with client sites to evaluate regulatory applicability and permitting requirements for proposed projects.
- Collaborate with a variety of state and local agencies for permitting requirements and/or permit conditions.
- Ensuring compliance with federal and state permitting requirements.
- Prepare and submit annual operating reports.
- Support and provide guidance for air permitting and visible emission training.

Senior Engineer I, 11/2021 - 01/2022

Montrose Environmental Group

- Evaluation of PSD applicability for a variety of projects, performing retrospective PSD analyses and netting analyses.
- Preparation of NSR and Title V permit applications for a variety of sites and projects, including permit renewal applications. Preparation of these applications can include evaluating regulatory applicability for existing and proposed equipment and equipment modifications, preparing detailed BACT, and interacting with client sites to obtain data needed to complete the emission calculations and application forms, and text.
- Working with client sites to evaluate regulatory applicability and permitting requirements for proposed projects.
- Working with staff performing air dispersion modeling analyses to determine culpable sources and adjust modeling inputs, including emission rates and stack parameters, to facilitate passing results.
- Interacting with staff at various state and local agencies to advocate for projects proposed by client sites and to respond to requests for additional information following the submittal of permit applications.
- Managing multiple projects for a wide variety of clients with differing needs, coordinating teams of staff to complete project goals, and mentoring and training junior staff to better understand air permitting.

Staff Engineer, 03/2014 - 11/2021

Environmental Consulting & Technology, Inc.

- Calculate potential and actual emissions for Carbon Monoxide (CO), Nitrogen Dioxide (NO₂), Sulfuric Dioxide (SO₂), and Particulate Matter (PM) for Prevention of Significant Deterioration (PSD) and Greenhouse Gas (GHG) Permits.
- Prepare and submit permit renewals, major modifications, and administrative amendments for Title V, Federally Enforceable, and Minor Operating Permits.
- Perform AERMOD air dispersion modeling for National Ambient Air Quality Standard (NAAQS) compliance.
- Created an emergency generator program to achieve compliance with the Reciprocating Internal Combustion Engine (RICE) Rule where I collaborated with various departments within the client's corporation to achieve compliance with the federal regulations for all emergency generators and fire water pumps throughout 23 states.

EDUCATION

Bachelor of Science: Agricultural and Biological Engineering, 12/2009

University of Florida