# TECHNICAL EVALUATION

# AND

# PRELIMINARY DETERMINATION

# FOR

Blacklidge Emulsions, Inc. – Tampa Plant #11

Hillsborough County

Construction Permit

Application Number

0571342-005-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

April 28, 2014

I. Project Description

A. Applicant:

Andrew Esposito
Area Manager
Blacklidge Emulsions, Inc.
5010 Montgomery Street
Tampa, Florida 33605

B. Engineer:

Dean H. Myers, P.E.
General Environmental Engineering, Inc.
205 West Palmetto Street
Lakeland, Florida 33815

C. Project and Location:

This permit modifies the recordkeeping requirement for the hot oil heater system and the heaters associated with the tanks. The project has been assigned the primary Source Classification Code No. 3-05-002-08 for Industrial Processes, Mineral Products, Asphalt Heater: Distillate Oil. The Standard Industrial Code for the project is No. 2951 (Petroleum Refining and Related Industries). The project is located at 5010 Montgomery Street, Tampa, Hillsborough County, FL 33605. UTM Coordinates of the location are 17 –362.4 E and 3087.5 N.

D. Process and Controls:

This permit modifies the recordkeeping requirement for the hot oil heater system and the heaters associated with the tanks. The recordkeeping requirements are changed to allow the facility to keep records of the amount of fuel used in the heaters and hot oil heater system instead of the hours of operation of the equipment.

In the air construction application, the facility requested that the hot oil heater system and the heaters associated with the tanks be exempt from permitting pursuant to Rule 62-210.300(3)34., F.A.C. - Fossil fuel steam generators, hot water generators, and other external combustion heating units with heat input capacity less than 100 million Btu per hour. However, because the tank heaters are an integral component of the tanks, which are regulated emission units, the heaters cannot be exempted from permitting. In addition, the facility cannot operate without the hot oil heater system, which maintains the product in liquid state during the facility transferring and storage operations. Therefore, these heaters cannot be exempted from permitting.

Blacklidge Emulsions, Inc., Tampa Plant #11, manufactures asphalt products used in the paving industry. The facility receives liquid asphalt cement and other liquid additive materials by tank truck and unloads them into storage tanks. The facility also receives ground tire rubber (GTR) in 2,100 pound super sacks. When ready for production, the liquid asphalt cement and

additives are pumped to a blending tank and mixed. The GTR from the super sacks is loaded into one of two dedicated hoppers by forklift and screw-conveyed into the blending tank for mixing with the liquid asphalt cement and the additives. From the blending tanks, the finished product is loaded into tanker trucks by two loading hoses or transferred into a different storage tank where it is stored until ready to be loaded out.

The facility has a total of eight storage/blending tanks. The product that each tanks stores may vary based on the production needs. Tank No. 4 is a duel-compartment, horizontal "cook-off" tank that typically stores off-spec paving asphalt. The off-spec paving asphalt is heated to remove the moisture and reclaim the paving asphalt. The remaining tanks are single compartment tanks. Tank No. 7 typically stores flux oil, which is an additive to the asphalt mixtures, at ambient temperatures.

The truck loading operations and each tank are heated by a central, 2.2 MMBTU/hr, hot oil system manufactured by GENCOR, Model No. C2-GO-15. In addition to the hot oil heater system, Tank Nos. 1, 2, 3, 5, 6, and 8 each have one diesel-fired burner with a maximum heat input of 0.8 MMBTU/hr manufactured by R.W. Beckett Corporation (Model SF Oil Burner). Tank No. 4 has two of these burners. Tank No. 7 does not have an individual tank heater. The heaters are used to help to maintain the tank operating temperatures from approximately 200 °F to a maximum temperature of 375 °F.

In addition to the eight storage/blending tanks, Blacklidge operates two additional storage tanks, which are not currently reflected in Blacklidge's operating permit. The first tank is an 8,000 gallon tank, referred to as Tank 9, which is used to store seal coat. Seal coat is an ambient temperature spray of top coat material that is used to refinish or restore the surface of asphalt. Based on the MSDS submitted and an annual throughput of 15,000 gallons, the VOC emissions from this tank were estimated to be 0.6 tons/year.

The second tank, referred to as Tank 10, is a 6,000 gallon tank that is used to store an adhesion promoter for asphalt products. Based on the MSDS submitted, the material does not contain any VOC or HAP components. Due to the low level of emissions, these two tanks can be exempt from permitting pursuant to Rule 62-210.300(3)(b)1., F.A.C. However, this permit includes a condition that requires Blacklidge to notify EPC at least 30 days in advance if Blacklidge plans to change the material stored in these tanks.

Particulate Matter (PM) and Volatile Organic Compounds (VOC) emissions from the heated storage and blending tanks, along with the truck loading operation are uncontrolled. However, the vents from the mixing tanks are routed down to the ground and through a quench drum (barrel) to help reduce emissions and odors where practical. PM emissions from the screw-conveyors are controlled by covers, while PM emissions from loading GTR into the hoppers are controlled by the use of reasonable precautions. The loading of GTR into the hoppers and the transfer up and into the tanks is exempt from permitting due to the low level of emissions pursuant to Rule 62-210.300(3)(b)1., F.A.C.

VOC and PM emissions are emitted from the storage, blending, and loading of asphalt products. The potential VOC emissions from the tanks, the truck loading operation, and the combustion of fuel oil in the heaters are limited to 16.1 ton/yr. The potential PM emissions

are limited 3.6 tons/year. The facility is subject to Rule 62-296.320, F.A.C. and Chapter 1-3.52.1., Rules of the EPC, which limit visible emissions to 20% opacity.

E. Application Information

Received On: March 27, 2014
Request for Additional Information: N/A
Application Complete: March 27, 2014

## II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes, Chapters, 62-204, 62-210, 62-212, 62-296, and 62-297, Florida Administrative Code (F.A.C.) and Chapter 1-3 of the Rules of the Environmental Protection Commission of Hillsborough County.

This project is subject to the requirements of Rule 62-212.300, General Preconstruction Review Requirements, F.A.C., since the project is not exempt from the permit requirements in Rule 62-210.300, F.A.C.

This project is not subject to the requirements of Rule 62-212.400, Prevention of Significant Deterioration, F.A.C. or Rule 62-212.500, New Source Review for Nonattainment Areas, F.A.C., since the facility is Synthetic Non-Title V by state definition.

This project is not subject to the requirements of Rule 62-213, Operation Permits for Major Sources of Air Pollution, F.A.C., since the facility is Synthetic Non-Title V by state definition.

This project is subject to the requirements of Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C., since the project is a source of particulate matter, volatile organic compounds, and a potential source of odors.

This project is not subject to the requirements of Rule 62-296.401 through 62-296.480, Specific Emission Limiting and Performance Standards, F.A.C., since there is not an applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.500, Reasonably Available Control Technology (RACT) - Requirements for Volatile Organic Compounds (VOC) and Nitrogen Oxides (NOx) Emitting Facilities, F.A.C., since there is not an applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.600, Reasonably Available Control Technology - Lead, F.A.C., since there is not an applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.700, Particulate Matter Reasonably Available Control Technology, F.A.C., since the potential PM emissions are below the exemption criteria from Rule 62-296.700(2), F.A.C.

This project is not subject to the requirements of Rule 62-204.800 Standards of Performance for New Stationary Sources, Federal Regulations Adopted by Reference, F.A.C., since there is no applicable source specific category in this rule.

This project is subject to the requirements of Chapter 84-446, Laws of Florida and Chapter 1-3, Rules of the Environmental Protection Commission of Hillsborough County.

III. Summary of Emissions

| Emission Unit (EU) | Pollutant | Potential Emissions (tons/yr) | Actual Emissions (tons/yr) | Increase in Emissions | Allowable Emissions |
|---|---|---|---|---|---|
| EU No. 002 - Tanks, Heaters, and Truck Loading [3] | PM | 3.6 | 1.4 | 2.2 | - |
| | VOC | 16.1 | 4.6 | 11.5 | - |
| | NOx | 1.2 | 0.6 | 0.6 | - |
| | CO | 0.3 | 0.2 | 0.1 | - |
| | $SO_2$ | 4.4 | 1.7 | 2.7 | - |
| | Opacity | - | - | - | 20% |

1. Actual emissions are based the average of 2011 and 2012 AOR data.
2. Potential VOC emissions from the tanks and the truck loading are calculated using the Clausius Clapeyron equation for vapor pressures from the technical paper, Estimates of Air Emissions from Asphalt Storage Tanks and Truck Loading, David C. Trumbore, Asphalt Technology Laboratory, Owens Corning, Summit, IL. 1999, three product transfers, and a maximum production rate of 80,000 tons of asphalt. In addition, potential VOC emissions include emissions from the combustion of diesel fuel oil in the heaters.
3. Potential PM emissions from the tanks and the truck loading are estimated to be 22% of the VOC emissions, based on the technical paper, Estimates of Air Emissions from Asphalt Storage Tanks and Truck Loading, David C. Trumbore, Asphalt Technology Laboratory, Owens Corning, Summit, IL. 1999. In addition, the potential PM emissions include emissions from the combustion of diesel fuel oil in the heaters.
4. Potential NOx, CO, and SO2 emissions are based a throughput of 124,176 gallons of diesel fuel oil per year and emissions factors from AP 42, Tables 1.3-1 and 1.3-3.

The inventory of hazardous air pollutant (HAP) emissions is estimated to be less than 10 TPY individually and less than 25 TPY, combined.

IV. Conclusions:

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., and Chapter 1-3, Rules of the Commission.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

V. Proposed Agency Action:

Pursuant to Section 403.087, Florida Statutes and Rule 62-4.070, Florida Administrative Code the Environmental Protection Commission of Hillsborough County hereby gives notice of its intent to issue an air construction permit for the increase in material throughput at the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).

CERTIFIED MAIL

In the Matter of an
Application for Permit by:

File No.: 0571342-005-AC
County: Hillsborough

Andrew Esposito
Area Manager
Blacklidge Emulsions, Inc.
5010 Montgomery Street
Tampa, Florida 33619

INTENT TO ISSUE

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP) gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated below.

The applicant, Blacklidge Emulsions, Inc., applied on March 27, 2014 to the EPC for an air construction permit to modify the recordkeeping requirement for the hot oil heater system and the heaters associated with the tanks. The recordkeeping requirements are changed to allow the facility to keep records of the amount of fuel used in the hot oil heater system and the heaters instead of the hours of operation of the equipment. The facility, which is a synthetic minor source of emissions, is located at 5010 Montgomery Street, Tampa, FL.

The EPC has permitting jurisdiction under Chapter 403 Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-210. The project is not exempt from permitting procedures. The EPC has determined that an air pollution construction permit is required to commence or continue operations at the described facility.

The EPC intends to issue this permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will comply with the appropriate provisions of Florida Administrative Code (F.A.C.) Chapters 62-204 through 62-297 and 62-4.

Pursuant to Section 403.815 and 403.0872, F.S. and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of this rule, "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. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the EPC at the address or telephone number listed below. **The applicant shall provide proof of publication to the EPC, Air Permitting Section, at 3629 Queen Palm Drive, Tampa, Florida 33619 (Phone 813-627-2600 - FAX 813-627-2660) within 7 (seven) days of publication.** Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-103.150(6), F.A.C.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 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 Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (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 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (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.

A petition that disputes the material facts on which the EPC's action is based must contain the following information:

(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 and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;

(c) A statement of how and when the petitioner received notice of the EPC action;

(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 EPC's proposed action;

(f) A statement of specific rules or statutes that the petitioner contends requires reversal or modification of the EPC'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 EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC'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 EPC's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, FL 32399-3000. The petition must specify the following information:

(a) The name, address, and telephone number of the petitioner,

(b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any,

(c) Each rule or portion of a rule from which a variance or waiver is requested,

(d) The citation to the statute underlying (implemented by) the rule identified in (c) above,

(e) The type of action requested,

(f) The specific facts that would justify a variance or waiver for the petitioner,

(g) The reason by the variance or waiver would serve the purposes of the underlying statute (implemented by the rule), and

(h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of the those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Any person listed below 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, and all other materials available to the EPC that are relevant to the permit decision. Interested persons may contact Diana M. Lee, P.E., at the above address or call (813) 627-2600, for additional information.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statues, by filing a notice of appeal under Rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Drive, Tampa, Florida 33619 and 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 the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

_____

Richard D. Garrity, Ph.D.
Executive Director

cc: Florida Department of Environmental Protection (via e-mail)
Dean H. Myers., P.E., General Environmental Engineering, Inc. (via e-mail)

CERTIFICATE OF SERVICE

The undersigned duly designated clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed by certified mail or e-mail before the close of business on _____ to the listed persons.

FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated clerk, receipt of which is hereby acknowledged.

_____ _____

Clerk Date

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY
NOTICE OF INTENT TO ISSUE PERMIT

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP), gives notice of its intent to issue air pollution Permit No. 0571342-005-AC to Blacklidge Emulsions, Inc. to modify the recordkeeping requirement for the tank heaters and the hot oil heater system. This permit authorizes the facility to keep records on the amount of fuel used instead of the hours of operation of the equipment. The facility, which is a synthetic minor source of emissions, is located at 5010 Montgomery Street, Tampa, FL.

A Best Available Control Technology (BACT) determination was not required.

The EPC will issue the Final permit with the conditions of the DRAFT permit 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 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 Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (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 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (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 of the F.A.C.

A petition that disputes the material facts on which the EPC's action is based must contain the following information:

(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, and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;

(c) A statement of how and when petitioner received notice of the EPC action;

(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 EPC proposed action;

(f) A statement of specific rules or statutes that the petitioner contends requires reversal or modification of the EPC'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 EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC'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.

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

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition this order will not be effective until further order of the EPC.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statues, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Drive, Tampa, Florida 33619 and 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 the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

The 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 Environmental Protection Commission of Hillsborough County, 3629 Queen Palm Drive, Tampa, Florida 33619. The complete project file includes the proposed Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Diana M. Lee, P.E., at the above address, or call 813-627-2600, for additional information. Any written comments filed shall be available for public inspection. If written comments received result in a significant change in the proposed agency action, the EPC shall revise the proposed permit and require, if applicable, another Public Notice.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Mr. Andrew Esposito
Area Manager
Blacklidge Emulsions, Inc. – Tampa Plant #11
5010 Montgomery Street
Tampa, Florida 33619

Re: Hillsborough County – Air Permitting
Permit No. 0571342-005-AC

Dear Mr. Esposito:

Enclosed is Permit Number 0571342-005-AC to modify the recordkeeping requirement for the hot oil heater system and the heaters associated with the tanks. The recordkeeping requirements are changed to allow the facility to keep records on the amount of fuel used in the hot oil heater system and the tank heaters instead of the hours of operation of the equipment, issued pursuant to Section 403.087, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department at 3629 Queen Palm Drive, Tampa, Florida, 33619 and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

cc: Florida Department of Environmental Protection (via e-mail)
Dean H. Myers., P.E., General Environmental Engineering, Inc. (via e-mail)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on _____ to the listed persons.

Clerk Stamp
FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated clerk, receipt of which is hereby acknowledged.

_____ _____
Clerk Date

**PERMITTEE:**
Blacklidge Emulsions, Inc. – Tampa Plant #11
5010 Montgomery Street
Tampa, Florida 33619

**PERMIT/CERTIFICATION**
Permit No.: 0571342-005-AC
County: Hillsborough
Expiration Date: October 30, 2014
Project: Modify Recordkeeping Requirements

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 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 EPC and made a part hereof and specifically described as follows:

This permit modifies the recordkeeping requirement for the hot oil heating system and the heaters associated with the tanks. The recordkeeping requirement is changed to allow the facility to keep records on the amount of fuel used in the hot oil heater system and the heaters.

Blacklidge Emulsions, Inc., Tampa Plant #11, manufactures asphalt products used in the paving industry. The facility receives liquid asphalt cement and other liquid additive materials by tank truck and unloads them into storage tanks. The facility also receives ground tire rubber (GTR) in 2,100 pound super sacks. When ready for production, the liquid asphalt cement and additives are pumped to a blending tank and mixed. The GTR from the super sacks is loaded into one of two dedicated hoppers by forklift and screw-conveyed into the blending tank for mixing with the liquid asphalt cement and the additives. From the blending tanks, the finished product is loaded into tanker trucks by two loading hoses or transferred into a different storage tank where it is stored until ready to be loaded out.

The facility has a total of eight storage/blending tanks. The product that each tanks stores may vary based on the production needs. Tank No. 4 is a duel-compartment, horizontal "cook-off" tank that typically stores off-spec paving asphalt. The off-spec paving asphalt is heated to remove the moisture and reclaim the paving asphalt. The remaining tanks are single compartment tanks. Tank No. 7 typically stores flux oil, which is an additive to the asphalt mixtures, at ambient temperatures.

The truck loading operations and each tank are heated by a central, 2.2 MMBTU/hr, hot oil system manufactured by GENCOR, Model No. C2-GO-15. In addition to the hot oil heater system, Tank Nos. 1, 2, 3, 5, 6, and 8 each have one diesel-fired burner with a maximum heat input of 0.8 MMBTU/hr manufactured by R.W. Beckett Corporation (Model SF Oil Burner).

Tank No. 4 has two of these burners. Tank No. 7 does not have an individual tank heater. The heaters are used to help to maintain the tank operating temperatures from approximately 200 °F to a maximum temperature of 375 °F.

Particulate Matter (PM) and Volatile Organic Compounds (VOC) emissions from the heated storage and blending tanks, along with the truck loading operation are uncontrolled. However, the vents from the mixing tanks are routed down to the ground and through a quench drum (barrel) to help reduce emissions and odors where practical. PM emissions from the screw-conveyors are controlled by covers, while PM emissions from loading GTR into the hoppers are controlled by the use of reasonable precautions. The loading of GTR into the hoppers and the transfer up and into the tanks is exempt from permitting due to the low level of emissions pursuant to Rule 62-210.300(3)(b), F.A.C.

In addition, the facility operates two tanks that are exempt from permitting. Tank No. 9, which is an 8,000 gallon tank, is used to store seal coat. Seal coat is an ambient temperature spray of top coat material that is used to refinish or restore the surface of asphalt. Tank No. 10, which is a 6,000 gallon tank, is used to store an adhesion promoter for asphalt products. Due to the low level of emissions, these two tanks are exempt from permitting pursuant to Rule 62-210.300(3)(b)1., F.A.C.

**Facility Information Summary**

Location: 5010 Montgomery Street, Tampa, Hillsborough County

UTM Coordinates: 17- 362.4 E, 3087.5 N

Facility ID No.: 0571342

EU No. 002 – Tanks and Truck Loading

| **Emission Point No.** | **Description** | **Capacity or Heating Value** |
|---|---|---|
| 1 | GTR Asphalt Blending Tank (T1) | 10,000 gallons |
| 2 | GTR Asphalt Blending Tank (T2) | 10,000 gallons |
| 3 | GTR Asphalt Blending Tank (T3) | 10,000 gallons |
| 4 | Horizontal Asphalt “Cook-off” Tank (T4) | 20,000 gallons |
| 5 | Asphalt Cement Storage Tank (H5) | 20,000 gallons |
| 6 | Asphalt Cement Storage Tank (H6) | 20,000 gallons |
| 7 | Asphalt Cement Storage Tank (T7) | 10,000 gallons |
| 8 | Asphalt Cement Storage Tank (T8) | 20,000 gallons |
| 9 | Tank Truck Loading | Single-arm, top-loading |
| 10 | GENCOR Hot Oil Heater | 2.2 MMBtu/hr |
| 11 | Heater for GTR Asphalt Blending Tank (T1) | 0.8 MMBtu/hr |
| 12 | Heater for GTR Asphalt Blending Tank (T2) | 0.8 MMBtu/hr |
| 13 | Heater for GTR Asphalt Blending Tank (T3) | 0.8 MMBtu/hr |

| Emission Point No. | Description | Capacity or Heating Value |
|---|---|---|
| 14 | Heater One for Horizontal Asphalt “Cook-off” Tank (T4) | 0.8 MMBtu/hr |
| 15 | Heater Two for Horizontal Asphalt “Cook-off” Tank (T4) | 0.8 MMBtu/hr |
| 16 | Heater for Asphalt Cement Storage Tank (H5) | 0.8 MMBtu/hr |
| 17 | Heater for Asphalt Cement Storage Tank (H6) | 0.8 MMBtu/hr |
| 18 | Heater for Asphalt Cement Storage Tank (T8) | 0.8 MMBtu/hr |

References Permit Nos.: 0571342-004-AC

Replaces Permit No.: 0571342-003-AO

SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]

2. 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, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]

3. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]

4. The use of property, facilities, equipment, processes, products, or compounds, or any other act that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.

**Operation and Emission Limitations**

5. As requested by the permittee, in order to establish this facility as a Synthetic Non-Title V Source, the following limitations shall apply per twelve consecutive month period: [Rules 62-4.070(3) and 62-210.200 (Potential to Emit), F.A.C. and Permit No. 0571342-004-AC]

A) The maximum production rate shall not exceed 80,000 tons of GTR paving asphalt.
B) The maximum facility wide diesel fuel usage shall not exceed 124,176 gallons/year.
C) The hot oil heater and each individual tank heater shall be fired only with No. 2 fuel oil containing a maximum sulfur content of 0.5% by weight.
D) The facility is permitted to operate continuously; 8,760 hours per 12-consecutive month period.
E) The temperature of each tank shall not exceed 375 °F.
F) The heat input rates for the hot oil heater and each individual tank heater shall not exceed 2.2 MMBtu/hr and 0.8 MMBtu/hr, respectively.

6. Visible emissions from the tanks, the truck loading activities, the hot oil heater, and each individual tank heater shall not be equal to or greater than 20% opacity. [Rule 62-296.320, F.A.C.; and Chapter 1-3.52, Rules of the Environmental Protection Commission of Hillsborough County, and Permit No. 0571342-004-AC]

7. The permittee shall not 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. During tank loading/loadout and tank to tank/blending

SPECIFIC CONDITIONS:

operations, if objectionable odors are noted, the operation(s) shall be curtailed or halted. If the Environmental Protection Commission of Hillsborough County receives odor complaints attributed to this facility and they are determined to be a nuisance, the permittee will need to evaluate their operations and propose corrective actions that may include installing additional odor control measures for this facility. [Rules 62-4.070(3) and 62-296.320(2), F.A.C.; and Chapter 1-3.22.3., Rules of the EPC, and Permit No. 0571342-004-AC]

8. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision 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, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include, but not be limited to, the following: [Rules 62-4.070(3) and 62-296.320, F.A.C.]

A) Limit vehicle speeds to 10 mph in unpaved areas and 15 mph in paved areas of the facility.
B) Wet roadways and unpaved areas as necessary to prevent excessive fugitive emissions. Paved areas shall be kept free of dirt and or debris by sweeping or vacuuming (no blowers permitted). If paved areas are not kept free of dirt and debris, they shall be maintained wet to the extent necessary to prevent excessive fugitive emissions.

9. Open burning is prohibited unless it is specifically authorized by a separate open burn permit issued by the EPC pursuant to Rule 62-296.320(3), F.A.C. [Rules 62-4.070(3) and 62-296.320(3), F.A.C. and Permit No. 0571342-004-AC]

**Compliance Testing**

10. Visible emissions testing shall be performed as follows. [Rule 62-297.310(7)(a), F.A.C.; and Chapter 1-3.52.3., Rules of the EPC]

A) Test each tank annually, once federal fiscal year (October 1 through September 30), with a target date of September 28$^{th}$.
B) Test the truck loading operation annually, once federal fiscal year (October 1 through September 30), with a target date of September 28$^{th}$.
C) Test two tank heaters annually, once federal fiscal year (October 1 through September 30), with a target date of September 28$^{th}$. The permitee shall ensure that each tank heater is tested at least once prior to the permit renewal.

11. Visible emissions testing for opacity shall be performed by a certified observer in accordance with EPA Method 9 for a minimum of thirty (30) minutes and shall include the period during which the highest opacity emissions can reasonably be expected to occur. Testing of emissions shall be conducted with the source operating at capacity. For the tanks, capacity is defined as actively loading or unloading the tank.

SPECIFIC CONDITIONS:

For the truck loading operation, capacity is defined as a truck being actively loaded. For the hot oil heater and each tank heater, capacity is defined as 90-100% of the heat input rates listed in Specific Condition No. 5.G). If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. [Rules 62-297.310(2)(b) and 62-297.310(4)(a)2, F.A.C.; and Chapter 1-3.52.3., Rules of the EPC]

12. The permittee shall notify the Air Compliance Section of the EPC at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted. [Rule 62-297.310(7)(a)(9), F.A.C.]

13. The permittee shall submit two copies of the compliance test reports to the Air Compliance Section of the EPC within forty-five days of completion of compliance testing. The test report shall contain sufficient detail on the source tested and the test procedures used to allow the EPC to determine if the test was properly conducted and the test results properly computed. [Rule 62-297.310(8), F.A.C. and Permit No. 0571342-004-AC]

14. When the Environmental Protection Commission of Hillsborough County (EPC) 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 Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rule 62-297.310(7)(b), F.A.C. and Permit No. 0571342-004-AC]

**Recordkeeping And Reporting Requirements**

15. In order to demonstrate compliance with Specific Condition No. 5, the permittee shall maintain monthly records of the GTR paving asphalt processing operations. The records shall be maintained on-site for a minimum of three years and shall be made available to the Environmental Protection Commission of Hillsborough County, state and federal officials upon request. The facility records shall include, but are not limited to, the following: [Rules 62-4.070(3) and 62-4.160(14), F.A.C.]

A) Month and Year of the data recorded;
B) The total weight of paving asphalt produced, in tons, on a monthly basis and the rolling 12-consecutive month total;
C) The total amount of diesel fuel consumed, in gallons, on a monthly basis and the rolling 12-consecutive month total.
D) Records of the fuel oil sulfur content.

SPECIFIC CONDITIONS:

16. The permittee shall submit to the Environmental Protection Commission of Hillsborough County, by April 1st of each calendar year, a completed DEP Form 62-210.900(5), "Annual Operating Report (AOR) for Air Pollutant Emitting Facility", for the preceding calendar year. [Rule 62-210.370(3), F.A.C.]

**Permit Applications and Transfers**

17. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

18. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200, F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

A) Alteration or replacement of any equipment or major component of such equipment
B) Installation or addition of any equipment which is a source of air pollution
C) For Tank Nos. 9 and 10 – If the tanks will be used to store a product that is different than the product information submitted on January 30, 2014, the facility shall notify EPC at least 30 days prior to changing the product(s).

19. Prior to sixty days before the expiration of this operating permit, the permittee shall apply for a renewal of the permit using the current version of the permit renewal application form. A renewal application shall be timely and sufficient. If the application is submitted prior to sixty days before the expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the EPC or, if there is court review of the final agency action, until a later date is required by Section 120.60, Florida Statutes. [Rules 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.
Executive Director