

FINAL 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

June 13, 2014

FINAL DETERMINATION

The Environmental Protection Commission of Hillsborough County mailed a public notice package on April 28, 2014 that included an Intent to Issue Permit No. 0571342-005-AC to Blacklidge Emulsions, Inc. The facility is located at 5010 Montgomery Street, Tampa, Hillsborough County, FL. This permit modifies the recordkeeping requirement for the hot oil heater system and the heaters associated with the tanks.

The facility published the Public Notice in La Gaceta on May 16, 2014.

COMMENTS/CHANGES

No comments were received from the applicant or the public.

CONCLUSION

The final action of the Environmental Protection Commission of Hillsborough County is to issue the permit as drafted.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Mr. Andrew Esposito
Plant 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

Blacklidge Emulsions, Inc.
Tampa, FL 33605

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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 dual-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, Heaters, 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	GENCOR Hot Oil Heater	2.2 MMBtu/hr
10	Heater for GTR Asphalt Blending Tank (T1)	0.8 MMBtu/hr
11	Heater for GTR Asphalt Blending Tank (T2)	0.8 MMBtu/hr
12	Heater for GTR Asphalt Blending Tank (T3)	0.8 MMBtu/hr

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

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 28th.
- B) Test the truck loading operation annually, once federal fiscal year (October 1 through September 30), with a target date of September 28th.
- C) Test two tank heaters annually, once federal fiscal year (October 1 through September 30), with a target date of September 28th. The permittee 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

Richard D. Garrity, Ph.D.
Executive Director

