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EXECUTIVE DIRECTOR  
Richard D. Garrity, Ph.D.

## MEMORANDUM

**DATE:** June 16, 2014  
**TO:** Richard D. Garrity, Ph.D.  
**FROM:** Roger Zhu  **THRU:** Diana M. Lee, P.E.   
**SUBJECT:** **Renewal Operating Permit No. 0570100-014-AO  
Gulf Sulphur Services Ltd., LLLP - Port Sutton Terminal**

Attached is renewal Permit No. 0570100-014-AO for Gulf Sulphur Services Ltd., LLLP (GSS) – Port Sutton Terminal located at 4388 Pendola Point Road, Tampa, FL 33619. The Port Sutton Terminal is a molten sulphur storage and handling facility. The molten sulphur is received from the ship/vessel, and pumped into the storage tanks, and then transported offsite by trucks. The operations at the Terminal involve one (1) ship unloading area, six (6) storage tanks, and three (3) truck loading stations. Currently, the facility handles only recovered molten sulfur; however, the facility is also permitted to handle mined molten sulfur.

Currently, the facility-wide PTEs are 13.5 TPY for particulate matter (PM) and 5.6 TPY for the sulfur particulate emissions. Since the issuance of the last permit renewal, two State rules directly affecting sulfur storage and handling are no longer in effect. More specifically, Rules 62-212.600 and 62-296.411, F.A.C. (Sulfur Storage and Handling Facilities) were repealed on February 16, 2012. However, due to the type of industry and the large-scale nature of the process and equipment (i.e. tanks, trucks, etc.) utilized, the facility remains a significant air pollution source for which there is a reasonable expectation of regulation from the public, and therefore, this permit renewal is being issued consistent with Rule 62-4.070(3), F.A.C.

In the renewal application, in addition to the request to remove the permit conditions associated with the repealed rules, GSS also requested to change the opacity limits, specified under Specific Condition No. 4, to the 20% general opacity standard of Rule 62-296.320(4)(b)1., F.A.C. According to Specific Condition No. 4 of the current operating air permit, visible emissions from any emission point in the molten sulphur system shall not exceed 10% opacity (six minute average), except during periods of ship unloading when visible emissions from the molten sulphur storage tanks shall not exceed 15% opacity (six minute average). These limitations were stipulated in accordance with Rule 62-296.411, F.A.C. Based on our review of this request and to be consistent with other local Molten Sulfur Terminal's air operating permits, the current opacity limits of 10% (15% during ship unloading) will remain in the operating permit pursuant to Rule 62-4.070(3), F.A.C., as there is available control technology capable of achieving these opacity limits, as demonstrated at other molten sulfur terminals in the area.

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Also, the spill collection and disposal measurements, specified under Specific Condition No. 11, will remain in the permit, pursuant to Rule 62-4.070(3), F.A.C. However, as requested, the sulphur PM emission standard under Specific Condition No. 5 associated with the repealed rules is being removed from this permit renewal. As part of the application review, the tank inspection records were reviewed. Based on these records, all the tanks (Tanks 1 thru 6) had their 10 year API 653 Out-of-Service inspections conducted as scheduled.

In August of last year, Gulf Sulphur Services, Hooker's Point facility (0570082), had several fires on Tank No. 8. In response to this incident, at the September EPC Meeting, the Board voted and directed EPC staff to work with the Molten Sulfur Industry to use existing rules and permits to develop enhanced inspection and reporting procedures to prevent and minimize fires and spills from molten sulfur tanks.

EPC staff has been meeting with industry representatives to determine the cause of the fires and develop BMPs. The preliminary determination was that corrosion was the reason for the deterioration of the tank, which allowed fumes to escape into the community. Based on Gulf Sulphur Services' investigation, their experts have determined that the fires were caused by a pyrophoric reaction caused by the formation iron sulfide, which is the result of iron oxide rust reacting with condensed solid sulfur and spontaneously igniting causing the fire. In addition, the duration of the fire was prolonged due to the marginal performance of the steam suppression system, which was supposed to smother the fire. Also, the holes in the roof allowed sulfur gases to escape from the tank and drift into the community.

As a result of the findings by GSS's investigation, they provided recommendations, so that they could be used to develop BMPs in order to prevent these incidents from occurring in the future. The corrective measures proposed were as follows:

1. Apply anti-corrosion epoxy coating to roofs to study their effectiveness at minimizing holes in Tanks 7 and 8 at the Hookers Point facility. Once GSS has evaluated the effectiveness, they can apply it to the other tanks.
2. Improved Tank Smothering System. GSS is improving the system by increasing its steam capacity, as well as distributing the steam from one (1) central nozzle to three (3) that encircle the tank.
3. New Personnel Training & Emergency Response Training and Communication.
4. Enhanced Tank Inspections
  - From just Quarterly to a more robust Hourly and Monthly In-House Inspections (External).
  - New Corrosion Rate Based API-653 Inspection Frequency (Entire Tank).
  - New Bi-Annual Non-destructive PEC Roof Thickness Mapping.

Since the fire incident, GSS implemented new state-of-the-art Pulsed Eddy Current (PEC) roof mapping procedures on Tanks 7 and 8 at the Hookers Point facility. Readings were taken at hundreds of locations on the roof so that GSS can measure any changes in the thickness of the steel and make repairs before holes develop. This will allow GSS to set their internal and external inspections based upon the results GSS obtains. GSS believes that this new approach, in conjunction with the use of coatings, as well as better employee training and improved first Responder communication, will allow GSS to prevent and minimize fires and spills in the future.

EPC staff along with the local molten sulfur terminal's representatives have set-up a Workgroup to help develop a BMP and improve reporting procedures. GSS' incident and proposed corrective measures should help towards the development of a BMP. The expectations are that each molten sulphur facility will develop: (1) a BMP with enhanced corrosion rate based inspections and maintenance procedures, (2) a written Emergency Response Plan (24 hr Notification) to notify the Tampa Port Authority, SWP, Fire Rescue and the EPC, and (3) a corrosion based API-653 Inspections. Also, these facilities should conduct an annual training

& biennial exercises with the Port Authority and Fire Rescue, and be a member of the Tampa Bay Spill Committee & LEPC Facility Disaster Planning Subcommittee.

Based on the renewal permit application submitted on March 20, 2014 and the proposed Emergency Response and Notification Plan along with the Facility Environmental Compliance Plan submitted on May 06, 2014 by GSS, we recommend issuing this renewal permit with an updated BMP, which is detailed under Specific Condition No. 23. In addition, GSS is required to comply with the Tank Inspection Schedule set forth in Attachment 1, the Tank Inspection procedures specified in Attachment 2 and the Emergency Response Plan specified in Attachment 3.

Based on our review, we recommend an issuance of the AO renewal permit as drafted.

KRZ: 0570100-014-AO



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ENVIRONMENTAL PROTECTION COMMISSION OF  
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL

Mario E. Gomez  
Operations Manager  
Gulf Sulphur Services, Ltd., LLLP  
4388 Pendola Point Rd.  
Tampa, FL 33619

File No.: 0570100-014-AO  
County: Hillsborough

Enclosed is Permit Number 0570100-014-AO to operate a molten sulphur storage and handling facility located at 4388 Pendola Point Road, Tampa, FL 33619, issued pursuant to Section 403.087, Florida Statutes. Please read this new permit thoroughly as there are changes from the previous permit.

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 Dr, 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 receipt of this permit. 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.

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. *An agency with values of environmental stewardship, integrity, honesty and a culture of fairness and cooperation*

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 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. 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.

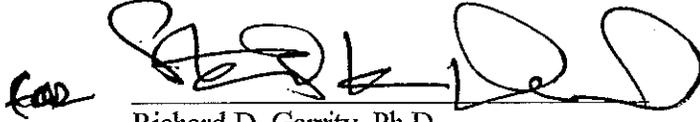
Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, and all other materials available to the EPC that are relevant to the permit 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 Statutes, 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 Dr, 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.

Sincerely,

A handwritten signature in black ink, appearing to read "RDG", written over a horizontal line.

Richard D. Garrity, Ph.D.  
Executive Director

RDG/KRZ/krz

cc: Scott McCann, P.E. - Golder Associates Inc.  
David Forziano, Esq. - David Forziano, P.L.

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on 6/16/14 to the listed persons.

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 120.52(11), Florida Statutes, with the clerk, receipt of which is hereby acknowledged.

Kense Beckler 6/16/14  
Clerk Date



#### COMMISSION

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Richard D. Garrity, Ph.D.

#### PERMITTEE:

Gulf Sulphur Services, Ltd., LLLP  
Port Sutton Terminal  
4388 Pendola Point Road  
Tampa, FL 33619

#### PERMIT/CERTIFICATION:

Permit No: 0570100-013-AO  
County: Hillsborough  
Expiration Date: June 16, 2019  
Project: Molten Sulphur Storage and Handling System

These permits are 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 of hereof and specifically described as follows:

Molten sulfur is delivered by ship and unloaded through enclosed pipes into one of six (6) sulfur storage tanks (Tank Nos. 1, 2, 3, 4, 5 and 6). Each tank has a capacity of 15,000 long tons per tank. The tanks can be loaded individually or multiple tanks at once. Each tank is filled using submerged loading. The three (3) truck loading stations operate without add-on emission controls. Each truck is top loaded by a mechanical arm through a dome opening. Currently, the facility handles only recovered molten sulfur; however, the facility is also permitted to handle mined molten sulfur.

The molten sulfur is heated by steam to a temperature of 265 °F from three (3) 10.5 MMbtu/hr natural gas boilers that are exempt from permitting by Rule 62-210.300(3)(a)34, F.A.C. The boilers are fired by natural gas with propane used as a back-up fuel, which stored in six (6) - 1000 gallon horizontal storage tanks on site.

Sulphur particulate matter emissions from the facility vent directly to the atmosphere and is limited by a limit on the sulphur throughput. The facility is no longer subject to Rules 62-296.411 and 62-212.600, F.A.C. (Sulfur Storage and Handling Facilities) because they have been repealed from the state rules in February 2012. However, the opacity limits of 10% (15% during ship unloading) are still required to be met by the facility pursuant to Chapter 1-3.52(2)(a)(3), Rules of the EPC. The spill collection and disposal measurements are still required pursuant to Rule 62-4.070(3), F.A.C.

In addition, Gulf Sulphur Services is required to comply with the Tank Inspection Schedule set forth in Attachment 1, the Tank Inspection procedures detailed in Attachment 2, and the Emergency Response Plan specified in Attachment 3.

Location: 4338 Pendola Point Rd, Tampa

UTM: 17-361.10E 3086.90N NEDS NO: 0100

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Roger P. Stewart Center  
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Emission Unit Nos.: 004 – Tank 1  
005 – Tank 2  
006 – Tank 3  
007 – Tank 4  
008 – Tank 5  
009 – Tank 6  
010 – Three Truck Loading Racks

Replaces Permit No.: 0570100-013-AO

PERMITTEE:  
Gulf Sulphur Services, Ltd., LLLP

PERMIT/CERTIFICATION NO.: 0570100-014-AO  
PROJECT: Molten Sulphur Storage and Handling System

SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]
2. 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.]
3. 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.]
4. Visible emissions from any emission point in the molten sulphur system shall not exceed 10% opacity (six minute average), except during periods of ship unloading when visible emissions from the molten sulphur storage tanks shall not exceed 15% opacity (six minute average).  
[Rules 62-4.070(3), F.A.C. and Chapter 1-3.52(2)(a)(3), Rules of the EPC]
5. [Reserved.]
6. In order to exempt the boilers from permitting the propane fuel consumption shall not exceed 2.5 million gallons of propane, annually. [Rule 62-210.300(3)34. g.]
7. In order to limit the potential emissions of sulphur particulate matter, particulate matter, hydrogen sulfide, and volatile organic compounds from individual emission units and this facility, the maximum molten sulphur throughput for the facility shall not exceed 1.6 million long tons per any 12 consecutive month period and the loading into any individual storage tank shall not exceed 1 million long tons molten sulphur in any 12 consecutive month period. [Rule 62-4.070(3), F.A.C.]
8. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320, F.A.C.]
9. The hours of operation are not restricted. [Rule 62-4.070(3), F.A.C.]
10. The permittee shall implement the necessary recordkeeping, maintenance, and procedures to minimize emissions from the molten sulphur system as follows: [Rule 62-4.070(3), F.A.C.]
  - A) All molten sulphur transfer shall be through enclosed piping systems. Contact surfaces between movable unloading arms and stationary pipes shall seat effectively around the entire circumference to minimize spillage.
  - B) All truck loading shall be accomplished using dropped tubes.
  - C) All tanks shall be filled using submerged loading.
  - D) All vent surfaces shall be cleaned monthly to remove captured particles.
  - E) All areas surrounding points where molten sulfur pipes are routinely disconnected and areas where molten sulfur is transferred to trucks or railcars shall be paved and curbed within 20

PERMITTEE:  
Gulf Sulphur Services, Ltd., LLLP

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PROJECT: Molten Sulphur Storage and Handling System

SPECIFIC CONDITIONS:

feet of the point of disconnection or transfer to contain any spilled molten sulfur, or shall be provided with noncorrosible drip pans or other secondary containment, positioned to collect spills, that are adequate to contain amounts of sulfur that may escape during routine disconnection, reconnection or operation of the piping system.

11. All spilled molten sulphur shall be collected and properly disposed of whenever the containment area is filled to one-half its containment capacity, or monthly, whichever is more frequent. Spills of molten sulfur outside of a containment area, or where subject to vehicular traffic, shall be collected and disposed of as soon as possible, but no later than 24 hours after the spill occurs.

[Rule 62-4.070(3), F.A.C.]

12. Test at least one ship unloading to the tank and the truck loading operation for visible emissions annually during each federal fiscal year (October 1 - September 30), with a target date of January 12. The visible emissions test shall be conducted at the point of highest opacity emanating from the storage tank during filling and the truck loading operations. Submit two copies of test data to the Air Section of the Environmental Protection Commission of Hillsborough County office within forty-five days of such testing. Testing procedures shall be consistent with the requirements of Rule 62-297, F.A.C.

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

13. Due to the low content of volatile organic compound (VOC) emissions in recovered sulphur, the EPC will waive the requirement to test upon renewal of this permit a tank vent for VOC emissions while being filled from a ship, providing that the facility only handle recovered sulphur. If the facility at any time handles sulphur from a source other than recovered sulphur, a one time VOC emissions test shall be required within 30 days of receipt of mined or mixed molten sulfur during the permit review cycle. In order to qualify for the waiver, a letter must be sent to the Environmental Protection Commission of Hillsborough County stating the types of sulphur that the facility has handled since the issuance of this permit. [Rule 62-4.070(3), F.A.C.]

13. Compliance with the emission limitations of Specific Condition No. 4 shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The EPA Method 9 observation period shall be at least thirty (30) minutes in duration. The VOC emissions shall be determined using EPA Method 25. Any required PM testing shall be performed using EPA Method 5. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A.

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

14. Testing of emissions must be conducted within 90-100% of the maximum permitted filling/transfer rate as shown below. If it is impracticable to test at 90-100% of the permitted rate, then the source may be tested at less than the permitted rate; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit(s) is so limited, then operation at higher rates is allowed for no more than fifteen days for purposes of additional compliance testing to regain the filling/transfer rate in the permit, with prior notification to the EPC. The filling/transfer rates for each source shall be specified in the test results. Failure to submit the operating rate and actual operating conditions may invalidate the test and fail to provide

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SPECIFIC CONDITIONS:

reasonable assurance of compliance. Operating conditions shall include the sulphur temperature and the type of sulphur (mined or recovered).  
[Rules 62-297.310(2)(b) and 62-4.070(3), F.A.C.]

<u>Source</u>	<u>Operation</u>	<u>Permitted Rate</u>
Tank Vents	Breathing Losses	N/A
Facility	Ship Unloading to Tanks	2,000 long tons/hr
Truck Loading	Tank Loadout to Trucks	120 long tons/hr/station

16. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County 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 contact person who will be responsible for coordinating and having such test conducted. [Rule 62-297.310(7)(a)9., F.A.C.]

17. In order to demonstrate compliance with Specific Condition Nos. 5, 6 and 7 the following records shall be maintained and shall be made available to any local, state, or federal air pollution agency upon request. Records shall be kept onsite for two years. [Rule 62-4.070(3), F.A.C.]

- A) Date, Month and Year
- B) Type of sulphur received by the facility (recovered or mined)
- C) Monthly and rolling 12 month summary of sulphur received and stored in each tank (long tons)
- D) Record molten sulphur temperature in each tank at least once a month (<sup>0</sup>F)
- E) Maintain records of spills outside of containment areas and of collection and disposal of spilled sulphur
- F) Maintain records of tank inspections, visual checks, maintenance and repair activities, and training as required by Specific Condition Nos. 22 and 23.

18. The permittee shall keep and maintain onsite test results for hydrocarbon content of each shipment of mined or mixed molten sulphur received. Tests shall be performed using the modified combustion infrared method developed by Gulf Sulphur in house. These records shall be kept onsite for a minimum of the most recent 2 years and made available to any local, state or federal air pollution agency upon request. [Rule 62-4.070(3), F.A.C.]

19. 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. [Rule 62-296.320(4)(c)]

- A) Ceasing of all loadout operations if visible emissions are observed in excess of the opacity limit. Corrective actions to minimize the visible emissions shall be taken prior to restarting the loadout operations.
- B) Maintain the drop tubes in the bulk truck loading stations in good operational condition.

PERMITTEE:  
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- C) Maintenance of roads, parking areas, and yards.
  - D) Removal of particulate matter from roads and other paved areas under control of the owner or operator to mitigate re-entrainment and from building or work areas to reduce airborne particulate matter.
20. 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.]
21. Changes deviating from the normal range in the method of operation or the material being handled which results in an increase in potential emissions shall be prohibited unless prior authorization is received from the Environmental Protection Commission of Hillsborough County. This shall include, but not be limited to, factors such as the type or form of sulphur handled at the facility or a significant increase in the percent of hydrocarbons in either the mined or industrially recovered sulphur. [Rule 62-4.070(3), F.A.C.]
22. The permittee shall conduct tank inspections on all the sulphur storage tanks in accordance with the Gulf Sulphur Services, Ltd. LLP, Tank Inspection Program, April 2014, Revision 4, as specified in Attachment 2. [Rule 62-4.070(3), F.A.C. and Enforcement Case No. 13-0808SW0082]
23. The permittee shall comply with the following Best Management Practices to eliminate or minimize sulfur fires and spills from the handling of molten sulfur: [Rules 62-4.070(3), F.A.C.]:
- A) Conduct routine hourly, and monthly visual inspections of the tanks, as well as bi-annual Non-invasive corrosion based roof inspection program using Pulsed Eddy Current (PEC) roof thickness mapping to adjust the API-653 Internal Out-of-Service and External In-Service tank inspections.
  - B) For the application of an anti-corrosion coating to the roofs of Tank Nos. 7 and 8 at the Hookers Point facility, the permittee shall evaluate the effectiveness of the coatings to prevent or minimize corrosion, and submit a report to the EPC by June 13, 2016 evaluating the effectiveness of the coatings, along with a schedule for their application on the remaining tanks.
  - C) Keep in service and maintain the tank steam smothering system in good repair to prevent and minimize excess emissions from sulfur fires.
  - D) Follow the Enhanced Emergency Response Plan Submitted on May 6, 2014 (Attachment 3), which includes emergency notification to all local first responders and the EPC of Hillsborough County, as well as employee training. The permittee shall also conduct annual emergency response exercises with the Tampa Port Authority and Tampa Fire Rescue to coordinate their responses to emergencies at their facility.
  - E) Maintain membership on the Tampa Bay Spill Committee and the Local Emergency Planning Committee (LEPC) Facility Disaster Planning Subcommittee.

PERMITTEE:  
Gulf Sulphur Services, Ltd., LLLP

PERMIT/CERTIFICATION NO.: 0570100-014-AO  
PROJECT: Molten Sulphur Storage and Handling System

SPECIFIC CONDITIONS:

23. Submit to the Environmental Protection Commission of Hillsborough County each calendar year on or before March 30, a report summarizing the inspections and maintenance conducted pursuant to the updated "API 653 Out-of-Service Tank Inspection Schedule" set forth in Attachment 1. The report shall include any findings or corrective actions taken.

[Rule 62-4.070(3), F.A.C. and Enforcement Case No. 13-0808SW0082]

24. 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. [Rule 62-4.090, F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION  
OF HILLSBOROUGH COUNTY



Richard D. Garrity, Ph.D.  
Executive Director

## ATTACHMENT - GENERAL CONDITIONS

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes (F.S.). The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.

4. Not applicable to Air Permits.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonable necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. A description of and cause of noncompliance; and
- b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

ATTACHMENT - GENERAL CONDITIONS

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Section 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rule 62-4.120 and 62-730.300 F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

- Determination of Best Available Control Technology (BACT).
- Determination of Prevention of Significant Deterioration (PSD)
- Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
  - 1. the date, exact place, and time of sampling or measurements;
  - 2. the person responsible for performing the sampling or measurements;
  - 3. the dates analyses were performed;
  - 4. the person responsible for performing the analyses;
  - 5. the analytical techniques or methods used;
  - 6. the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

16. Not applicable to Air Permits.

17. Not applicable to Air Permits.