Florida Department of Environmental Protection

Memorandum

TO: Rick Bradburn
THROUGH: Armando I. Sarasua, P.E.
FROM: Angelia Jackson
DATE: January 5, 2011
SUBJECT: Evaluation Summary for Halcorp, Incorporated, Pensacola Asphalt Terminal 0330060-010-AO, Escambia County

We recommend issuing a renewal operating permit to Halcorp, Incorporated to operate their Pensacola Asphalt Terminal. This permit follows 0330060-009-AO, effective February 28, 2007.

Process Description.
This facility consists of an asphalt terminal with heated tanks and a loading rack. Asphalt is received by barge and pumped into asphalt storage tank No. 3. Asphalt is transferred into No. 6 storage tank, then to a smaller working tank, and subsequently loaded into tanker trucks. Emissions from tanker truck loading are collected by an asphalt vapor collection system and treated by a venturi scrubber.

This facility also consists of the two natural gas fired heaters, with a maximum heat input of 10.59 MMBtu/hr each. The heaters are used to heat thermal fluid (hot oil) contained in a piping system which heats the tanks. The facility recently removed the fuel oil storage and piping so only natural gas can be used as fuel in the heaters.

Pollution Control Equipment.
Emissions from tanker truck loading are collected by an asphalt vapor collection system, and treated by a venturi scrubber.

Environmental Impact.

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions		Allowable Emissions	
		lbs/hr	T/yr	lb/hr	T/yr
PM	N/A	N/A	N/A	N/A	N/A
SO2	N/A	N/A	N/A	N/A	N/A
VOC	N/A	N/A	N/A	N/A	N/A
NOx	N/A	N/A	13.1	N/A	N/A
CO	N/A	N/A	N/A	N/A	N/A
Objectionable Odors	62-296.320(2)	N/A	N/A	None allowed off plant property	
VE	62-296.406(1)	N/A	N/A	Not more than 20% opacity except for either one six-minute period per hour during which opacity shall not exceed 27 percent	

Applicable Rules & Regulations. This source is regulated in accordance with Rule 62-296.320(2), F.A.C. These heaters are subject to the requirements of 40 CFR 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam generating Units.

Compliance Monitoring.
Record keeping for number of trucks loaded, wind velocity and direction, objectionable odor complaints, and heater fuel combusted.

Compliance History.
Compliance Inspections from **2011 – 2006,** noted the facility as "In-Compliance", with the exception of **2008**. A Compliance Inspection in **2008** the facility received a status of "Minor Non-Compliance" for failure to document the wind velocity and direction on a daily basis. This is required because of odor complaints from neighbors. January 2008 a Non-compliance Letter was sent to facility. March 2008 – Compliance without enforcement and case closed.

Fee Summary.
This facility has two emissions units, an AO2B ($1,000 fee, minor source - VE testing), and an AO2C ($750, minor source, no testing).

Additional Notes:
Construction permit 0330060-003-AC allowed the use of No. 2 Distillate fuel oil for Emissions Unit 067. The facility no longer uses No. 2 Distillate on the heaters and the piping and storage for the No. 2 Distillate have been removed. References to No. 2 Distillate fuel oil have been removed from this renewal permit.

Emissions Unit 067 consists of the two natural gas fired heaters, identified as Heaters 1 and 2. Heater 2 (South Heater) is temporarily out of service as of the effective date of this permit. The duration of the visible emissions test required for EU 067 has been changed in this renewal to reflect rule requirements

AMJ/c