TECHNICAL EVALUATION

AND

PRELIMINARY DETERMINATION

FOR

Chemtrade Logistics, LLC

Hillsborough County

DRAFT Construction Permit

Application Number

0570229-013-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

December 17, 2014

I. Project Description

A. Applicant:

Paul Spisak
Tampa Plant Supervisor
Chemtrade Logistics, LLC
3004 E. Clark Street
Tampa, FL 33605

B. Engineer:

Cory A. Houchin, P.E.
Environmental Sciences Group
P.O. Box 7495
Tampa, FL 33673

P.E.# 58064

C. Project and Location:

This project is to modify the Railcar Loading (EU #002) to include the loading of tanker trucks, using the same chute as the railcar loadout, and also authorizes a truck loading operation inside the material handling building at the liquid aluminum sulfate manufacturing facility located in Tampa.

The project has been assigned NEDS Source Classification Code (SCC) No. 3-01-999-98 for Industrial Processes – Chemical Manufacturing. The Standard Industrial Code for the project is # 2819 (Industrial Inorganic Chemicals, Not Elsewhere Classified). The project will take place at 3004 East Clark Street, Tampa, Florida 33605, Hillsborough County. UTM Coordinates of location are 17-359.9 East and 3092.3 North.

D. Process and Controls:

The existing facility manufactures liquid aluminum sulfate by mixing finely crushed bauxite and up to 10% by weight Alternate Alumina Source (AAS) material with sulfuric acid and water in a 21,840 gallon Batch Reactor Mix Tank. Raw bauxite/AAS is delivered to the facility by covered trucks and is gravity unloaded into the material handling building (EU 003). Bauxite/AAS may also be stored outside and covered with tarps. Operations in the material handling building include bauxite/AAS storage, a front-end loader, feed hopper, belt conveyor, hammermill crusher, and an enclosed conveyor system which conveys the crushed bauxite/AAS to the bucket elevator outside which may feed the Batch Reactor Mix Tank (EU 001), or a screw conveyor which leads to the Bauxite/AAS Storage Silo (EU 004) or the Railcar Loadout (EU 002).

PM emissions from the hammermill crusher and the belt conveyor transfer point are controlled by an EVO Corporation Baghouse, Model No. 84NF036C. The baghouse vents inside the

material handling building. PM emissions from the loading of the Bauxite/AAS storage silo are controlled by a cloth filter and PM emissions from the Railcar Loading are controlled by the use of a cloth filter over the railcar vent. PM and Sulfuric Acid Mist (SAM) emissions from the batch reaction process are controlled by a Bionomic Series 4000 cross flow horizontal scrubber. The facility-wide PTE for PM and SAM are 23.1 TPY and 3.1 TPY, respectively.

Chemtrade Logistics is requesting to modify the existing permit to include the loading of tanker trucks at the Railcar Loading station (EU #002). The existing railcar loading station has a "Y" on the loading chute to switch from railcars to trucks. The loading procedure is exactly the same for the tankers truck as it is for the railcar tankers with a loading rate of 23 TPH. A fabric filter is attached to the vent of the truck tanker and bauxite is gravity dropped into the tanker. This emission unit is limited to 1,138 hours per 12 consecutive months. The permitted annual bauxite throughout is 20,000 TPY on a dry weight basis.

Also, Chemtrade is requesting that truck loading be authorized as one of the activities performed inside the Material Handling Building (EU#003). Currently, trucks are unloaded and material is moved to storage piles within the building before it is processed to manufacture liquid aluminum sulfate. Chemtrade is not requesting any other changes to this emission unit.

The PTE calculation for the Material Handling Building (EU#003) includes the front-end loader to the hopper as an emission source. Trucks can also be loaded inside the Material Handling Building by the front-end loader. Since the annual throughput of EU #002 and #003 will not increase, there is no change to the PTE calculations and the current facility-wide PTE of 23.1 TPY of PM and 3.1 TPY of SAM remain the same.

Emission Units 001 through 004 are subject to PM-RACT (Rule 62-296.712, F.A.C.) and Rule 1-3.52, Rules of the EPC with a 5% opacity standard, since the facility-wide PTE for PM is greater than 15 TPY and 5 lbs/hr.

The last VE tests for EU 002 and EU 003 were conducted on August 26 and 27, 2014. The results were submitted to the EPC on September 15, 2014 and were determined to be in compliance by the Air Compliance Section.

E. Application Information:

Received on: November 12, 2014
Information Requested: N/A
Application Complete: December 2, 2014

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes, Chapters, 62-204, 62-209, 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 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 minor by state definition and the modification is also minor (less than 250 TPY increase).

This project is subject to the requirements of Rule 62-212.300, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C., since the project is a source of particulate matter and sulfuric acid emissions, and, therefore, not exempt from the permit requirements in Rule 62-210.300, F.A.C.

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 and sulfuric acid mist and has the potential to emit odors.

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 not a Title V Source by state definition.

This project is not subject to the requirements of Rule 62-296.401, through 62-296.418, Specific Emission Limiting and Performance Standards, F.A.C., since there is not an applicable source category.

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

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 category.

This project is subject to the requirements of Rule 62-296.700, Reasonably Available Control Technology (RACT) Particulate Matter, F.A.C., since it is located within the Hillsborough County Maintenance Area for the pollutant particulate matter and the PM emissions exceed the exemption thresholds from the rule (Rule 62-296.712, F.A.C.).

This project is not subject to the requirements of Rule 62-204.800, Federal Regulations Adopted by Reference, F.A.C., since there is not an applicable source category.

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	Potential PM Emissions (TPY)*
002–Railcar/Truck Loading	1.2
003–Material Handling Building	14.6**

* The potential PM emissions were calculated based on emission factor of 1.1 lb/ton from AP-42 - Table 11.24-2, total throughput of 22,000 ton/yr, control efficiency of 90% for the sock filter and 70% for building enclosure.

** The emission factor used for Belt conveyor to hammermill is 2.7 lb/ton and efficiency factor of 99% for the baghouse and 70% for the building enclosure.

Inventory of Title III pollutants is estimated to be less than 10 TPY individually and less than 25 TPY collectively.

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 a permit to modify the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).

COMMISSION
Kevin Beckner
Victor D. Crist
Ken Hagan
Al Higginbotham
Lesley "Les" Miller, Jr.
Sandra L. Murman
Stacy White

EXECUTIVE DIRECTOR
Richard D. Garrity, Ph.D.

DIVISION DIRECTORS
Legal & Admin. Richard Tschantz, Esq.
Air Management Jerry Campbell, P.E.
Waste Management Hooshang Boostani, P.E.
Water Management Sam Elrabi, P.E.
Wetlands Management Scott Emery, Ph.D.

CERTIFIED MAIL

In the Matter of an
Application for Permit by:

File #: 0570229-013-AC
County: Hillsborough

Paul Spisak
Tampa Plant Supervisor
Chemtrade Logistics, LLC
3004 E. Clark Street
Tampa, FL 33605
_____/

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, General Chemical, LLC, applied on November 12, 2014 to the EPC for a permit to modify the Railcar Loading (EU #002) to include the loading of tanker trucks, using the same chute as the railcar loadout, and also to authorize the truck loading operation inside the material handling building at the liquid aluminum sulfate manufacturing facility located in Tampa.

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 Dr., 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 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 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 is required to 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 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

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

_____

Richard D. Garrity, Ph.D.
Executive Director

cc: Florida Department of Environmental Protection, Southwest District (via email)
Cory A. Houchin, P.E. – Environmental Sciences Group (via email)

CERTIFICATE OF SERVICE

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

Clerk Stamp
FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 120.52(11), 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. 0570229-013-AC to Chemtrade Logistics, LLC to modify the Railcar Loading (EU #002) to include the loading of tanker trucks, using the same chute as the railcar loadout, and also to authorize the truck loading operation inside the material handling building at the liquid aluminum sulfate manufacturing facility located in Tampa. Chemtrade, a Minor facility, is located at 3004 East Clark Street, Tampa, Florida 33605 in Hillsborough County.

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 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 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 is required to 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 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 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.

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 Dr., Tampa, FL 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.

COMMISSION
Kevin Beckner
Victor D. Crist
Ken Hagan
Al Higginbotham
Lesley "Les" Miller, Jr.
Sandra L. Murman
Stacy White

EXECUTIVE DIRECTOR
Richard D. Garrity, Ph.D.

DIVISION DIRECTORS
Legal & Admin. Richard Tschantz, Esq.
Air Management Jerry Campbell, P.E.
Waste Management Hooshang Boostani, P.E.
Water Management Sam Elrabi, P.E.
Wetlands Management Scott Emery, Ph.D.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Paul Spisak
Tampa Plant Supervisor
Chemtrade Logistics, LLC
3004 E. Clark Street
Tampa, FL 33605

Dear Mr. Spisak: Re: Hillsborough County - AP

Enclosed is Draft Permit Number 0570229-013-AC to modify the Railcar Loading (EU #002) and also to authorize the truck loading operation inside the material handling building at the liquid aluminum sulfate manufacturing facility located in Hillsborough County at 3004 East Clark Street, Tampa, Florida 33605, 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 Dr., Tampa, FL 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

RDG/Sn/sn

cc: Florida Department of Environmental Protection, Southwest District (via email)
Cory A. Houchin, P.E. – Environmental Sciences Group (via email)

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(11), Florida Statutes, with the designated clerk, receipt of which is hereby acknowledged.

_____ _____
Clerk Date

COMMISSION
Kevin Beckner
Victor D. Crist
Ken Hagan
Al Higginbotham
Lesley "Les" Miller, Jr.
Sandra L. Murman
Stacy White

EXECUTIVE DIRECTOR
Richard D. Garrity, Ph.D.

DIVISION DIRECTORS
Legal & Admin. Richard Tschantz, Esq.
Air Management Jerry Campbell, P.E.
Waste Management Hooshang Boostani, P.E.
Water Management Sam Elrabi, P.E.
Wetlands Management Scott Emery, Ph.D.

PERMITTEE:
Paul Spisak
Tampa Plant Supervisor
Chemtrade Logistics, LLC
3004 E. Clark Street
Tampa, FL 33605

PERMIT/CERTIFICATION
DRAFT Permit No: 0570229-013-AC
County: Hillsborough
Expiration Date: 6/1/2015
Project: Modification of Bauxite Loading Operation

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 of hereof and specifically described as follows:

Chemtrade is a liquid aluminum sulfate manufacturing facility. This permit modifies the existing facility operation to include the loading of tanker trucks at the Railcar/Truck Loading station (EU #002). The existing railcar loading station has a "Y" on the loading chute to switch from railcars to trucks. The loading procedure is exactly the same for the tankers truck as it is for the railcar tankers with a loading rate of 23 TPH. A fabric filter is attached to the vent of the truck tanker and bauxite is gravity dropped into the tanker.

Also, truck loading will be performed inside the Material Handling Building (EU#003). Currently, trucks are unloaded and the bauxite material is moved to storage piles within the building before it is processed to manufacture liquid aluminum sulfate.

The existing facility manufactures liquid aluminum sulfate by mixing finely crushed bauxite and up to 10% by weight Alternate Alumina Source (AAS) material with sulfuric acid and water in a 21,840 gallon Batch Reactor Mix Tank. Raw bauxite/AAS is delivered to the facility by covered trucks and is gravity unloaded into the material handling building (EU 003). Bauxite/AAS may also be stored outside and covered with tarps. Operations in the material handling building include bauxite/AAS storage, a front-end loader, feed hopper, belt conveyor, hammermill crusher, and an enclosed conveyor system which conveys the crushed bauxite/AAS to the bucket elevator outside which may feed the Batch Reactor Mix Tank (EU 001), or a screw conveyor which leads to the Bauxite/AAS Storage Silo (EU 004) or the Railcar/Truck Loadout (EU 002).

PERMITTEE:
Chemtrade Logistics, LLC

PERMIT/CERTIFICATION NO.:0570229-013-AC
PROJECT: Modification of Bauxite Loading Operation

Location: 3004 East Clark Street, Tampa, FL 33605

UTM: 17-359.9 E 3092.3 N ARMS ID NO: 0570229

Emission Unit Nos. : 002 – Railcar/Truck Loading
003 – Material Handling Building

References Permit No.: 0570229-011-AO

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. 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.]

5. In order to limit the potential to emit of the emission units, the PM emissions and visible emissions (VE) from the following sources shall not exceed the following limits:
[Rules 62-4.070(3), F.A.C., Permit No. 0570229-011-AO, and Rule 1-3.52, Rules of the EPC]

Emission Unit	Source	Allowable	VE Standard
001	Batch Reactor Mix Tank	0.03 gr/dscf	5% opacity
002	Railcar/Truck Loading	n/a	5% opacity
003	Material Handling Building	n/a	5% opacity
004	Bauxite/AAS Storage Silo	n/a	5% opacity

6. In order to demonstrate compliance with the limitations of Specific Condition No. 5, the following operating limits shall not be exceeded on a twelve consecutive month period: [Rule 62-4.070(3), F.A.C., and Permit No. 0570229-007-AO]

Process/Description	Limit
A) Maximum production rate	60 tons per batch (dry basis)
B) Reverse Mix Process	3 batches/day, 1,095 batches/yr.
C) Bauxite Usage	20,000 tons/yr.
D) Maximum Alternate Alumina (AAS) Source usage* (on a dry weight basis)	2,000 tons/yr.

7. In order to limit the facility's potential to emit, the hours of operation for the Railcar/Truck Loading operation shall not exceed 1,138 hours per 12 consecutive month period. Hours of operation for the activities inside the Material Handling Building and the Bauxite/AAS Storage Silo are not limited.
[Rule 62-4.070(3), F.A.C. and Permit No. 0570229-011-AO]

SPECIFIC CONDITIONS:

8. Test all the emission units for visible emissions annually during each federal fiscal year (October 1 - September 30) and submit two copies of the test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within forty-five days of such testing. Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C. Additionally, the visible emissions testing of EU 002 and EU 003 shall be conducted for each of the following scenarios:

A) The storage building during truck loading. If a truck is not unloaded during the federal fiscal year, notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County in writing and test the next truck that is loaded inside the building for opacity.

B) The truck loading filter vent. If a truck is not loaded during the federal fiscal year, notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County in writing and test the next truck that is loaded at railcar/truck loadout for opacity.

9. Compliance with the emission limitations of Specific Condition No. 5 shall be determined using EPA Methods 1, 2, 4, 5, 8, and 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The sampling time per run for EPA Methods 1, 2, 3, 5, and 8 shall be 3 and ½ hours during the process period in which maximum emissions are emitted. The EPA Method 9 observation period for the Bauxite/AAS Storage Silo, Material Handling Building, and Railcar Loading shall be 30 minutes, whereas the EPA Method 9 observation period for the Batch Reactor Mix Tank shall be at least 60 minutes during the process period in which maximum emissions are emitted. For the Material Handling Building, the opacity reading of the roof vents or entrance door, whichever is higher, shall be recorded for the building. 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.

10. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity of 60 tons (on a dry weight basis) of product per batch, up to 10% AAS (on a dry weight basis), and the maximum silo filling and railcar/truck loading rate of 23 tons per hour. The EPA Method 9 test on the Batch Reactor Mix Tank stack and reactor building shall be performed under the same operating conditions, process, and emission rates as during the compliance tests for particulate matter and sulfuric acid mist. The hammermill crusher and the truck loading inside the Material Handling Building shall be operating at capacity (i.e. 90-100% of 23 tph for the crusher and 46 tph for the truck loading) while performing the emission test on the Material Handling Building. 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. Failure to submit the input rates and actual operating conditions such as baghouse pressure drop, scrubber pressure drop, and scrubber liquid flow rate may invalidate the test. [Rules 62-4.070(3) and 62-297.310(2)(b), F.A.C.]

11. 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

SPECIFIC CONDITIONS:

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]

12. In order to ensure compliance with the emission limitations in Specific Condition Nos. 4, 5 and 6, the following restrictions and limitations for the Batch Reactor Mix Tank operation shall apply: [Rule 62-4.070(3), F.A.C., and Construction Permit Application received January 15, 2009]

a) The scrubber shall be in operation prior to the addition of bauxite or sulfuric acid to a new batch.
b) The scrubber shall remain in operation for at least the initial 3 and ½ hours of each batch to ensure that the control device is operating during the process period in which maximum emissions are emitted.
c) The permittee shall maintain and operate the scrubber in accordance with the design as submitted with the application.

13. In order to demonstrate compliance with Specific Condition Nos. 5, 6, and 7 the permittee shall maintain records of operations for the most recent three year period. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state or federal air pollution agency upon request. The records shall include, but not limited to, the following:
[Rules 62-4.070(3), and 62-4.160, F.A.C]

A) Day, Month, Year.
B) Amount of Bauxite and AAS received by truck (tons).
C) Raw material usage: Bauxite: _____ tons, AAS:_____ tons.
D) Number of batches and Aluminum Sulfate production in tons per batch (on a dry weight basis).
E) Hours of operation for the Railcar Loading operation.
F) A monthly and rolling 12-month total of the items specified above in B) thru E).
G) Pressure drop reading of the scrubber during the reaction period of each batch.

14. 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. The reasonable precautions employed by the facility should include, but not be limited to:

A) Using only enclosed railcars.
B) Filtering dust-laden displaced air from the railcar or truck vent with a cloth filter.
C) Application of water or dust suppressants on unpaved plant grounds.
D) Removal of particulate matter from paved areas, buildings and work areas under the control of the owner/operator.
E) Use of the baghouse during crushing operations.

15. When the Environmental Protection Commission of Hillsborough County (EPC) after

SPECIFIC CONDITIONS:

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 may 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.]

16. The permittee shall annually perform a visual inspection of the tank(s), pumping system, pipes, hoses, valves and associated auxiliary instruments/equipment for rust, cracks or leaks and ensure that all emission control devices are functioning properly. The permittee shall document and retain all findings and corrective action taken for a minimum period of twenty-four months. [Rule 62-4.070(3) F.A.C.]

17. 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.

18. The pollution control equipment (baghouse, scrubber, building enclosure, and cloth filters) shall be operated and maintained in good repair to perform adequately the function for which they are intended. Maintenance shall include, but is not limited to, daily/weekly/monthly/quarterly/annual inspections and replacement or repair of faulty equipment when necessary or as required by the manufacturer. The permittee shall comply with the requirements of the Operation and Maintenance (O&M) Plan for the scrubber as described below: [Rule 62-4.070(3), and 62-296.700(6), F.A.C.]

Scrubber

A) Process Parameters:
   1. Manufacturer: Bionomic Industries
   2. Model Name and Number: Bionomic Series 4000
   3. Type: Model 6 cross-flow scrubber
   4. Maximum Design Gas Volume: 10,000 acfm
   5. Average Inlet Temperature: 209 ^{o}F
   6. Scrubbing Flow Rate: 35 - 50 gpm (recycle)
   7. Design Spray nozzle pressure: 10 psig
   8. Pressure drop across scrubber: < 3 inches w.c. (max. – 5 psig)
   9. Efficiency: Sulfuric acid mist – 95%
   10. Efficiency: Particulate Matter – 98%
   11. Process controlled by scrubber: Aluminum Sulfate Batch Reactor
   12. Operation Schedule: 8,760 hrs/yr

B) The following observations, checks and operations shall be conducted on the schedule specified:

   Daily

   1. Inspect general condition of the equipment when the equipment is operated

SPECIFIC CONDITIONS:

Monthly
1. Inspect Packing Media
2. Inspect Spray Nozzles
3. Inspect Ducts and Drains
4. Inspect Re-circulating Piping

Quarterly
1. Inspect Fan Shaft Bearings
2. Inspect Fan Drive Coupling
3. Inspect Fan Motor

Annual
1. Inspect Fan Blades

21. 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.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

_____
Richard D. Garrity, Ph.D.
Executive Director