ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Mr. Ken Stover
Terminal Manager
Pasco Terminals, Inc.
3411 Port Sutton Road
Tampa, FL 33619

File No.: 0570455-010-AO
County: Hillsborough

Dear Mr. Stover,

Enclosed is FINAL Permit No. 0570455-010-AO for the renewal of Permit No. 0570455-008-AO for the operation of a molten sulfur storage and handling facility, issued pursuant to Section 403.087, Florida Statutes. Please read this new permit thoroughly as there are changes from the DRAFT permit. Based on comments received from the permittee, the Tank Inspection Program was changed to add more flexibility on the type of testing methods used during out of service tank inspections. No other changes were made to the DRAFT permit issued on October 24, 2012.

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.

ENVIRONMENTALPROTECTION COMMISSION OF
HILLSBOROUGH COUNTY

Richard D. Garrity, Ph.D.
Executive Director

RDG/JDS/jds

cc: Florida Department of Environmental Protection, Southwest District (e-mail)
Janice Sands Ash, P.E., The Ash Group, Inc. (e-mail)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were sent by certified mail or electronic mail before the close of business on _____ to the listed persons.

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

_____ _____
Clerk Date

PERMITTEE:
Pasco Terminals, Inc.
3411 Port Sutton Road
Tampa, FL 33619

PERMIT/CERTIFICATION
Permit No.: 0570455-010-AO
County: Hillsborough
Expiration Date: October 24, 2017
Project: Sulfur Terminal Renewal

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 is for the renewal of Permit No. 0570455-008-AO at the molten sulfur storage and handling facility.

The facility operates four sulfur storage tanks, two boilers, two truck loading stations, one marine vessel unloading station, and the associated transfer pumps and piping. Molten sulfur is delivered by ship and unloaded into one of three sulfur storage tanks (Tank Nos. 1, 2 and 5). Molten sulfur from the three tanks is transferred to the fourth tank (Tank No. 3) as needed for short-term storage while awaiting loadout to trucks. From Tank No. 3, the sulfur is delivered to an adjacent 200 ton sulfur loading pit with a cover that is used to temporarily store the sulfur prior to being loaded out to the trucks. Two pumps and associated piping draw the sulfur from the pit and transfer it to two truck loading stations where it is loaded into trucks for transport off-site. The truck loading stations operate without add-on emission controls. Emissions are controlled by limitations on the molten sulfur throughput, submerged storage tank filling, drop tube truck loading, and control systems on the exhaust from each storage tank. The molten sulfur storage tanks have the following capacities:

| Tank Number | Capacity (Long Tons) |
|---|---|
| 1 | 9,350 |
| 2 | 9,326 |
| 3 | 9,350 |
| 5 | 15,596 |

A control system is located on each tank for the improved collection of particulates vented from the tanks. A 12” high temperature duct hose is connected to a single vent on top of the tanks near the side. The remaining vents on the tanks remain closed except for emergency pressure release. The hose is routed down approximately 25’ to an aluminum collection box on the ground measuring 24” high X 18” deep X 30” wide. A second 12” hose is connected to the outlet of the collection box and routed back to the top of the tank and exhausted to the atmosphere. The length of travel through the control system reduces the temperature and velocity allowing sulfur particulates to collect in the collection box. The collection box includes an access door for removal of collected sulfur particulate.

The *Tank Inspection Program* (including the *Tank Inspection and Maintenance Profile)* is included in the permit for additional assurance of compliance and to provide reassurance of proper maintenance of the tanks to reduce the chances of tank failure. Submittal of an AOR is not required consistent with the other sulfur handling facilities due to relatively low level of emissions from these operations.

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. Annual visible emission testing is required on all the storage tanks and the truck loading operations.

Also present at the site are two boilers that are fired primarily on natural gas with diesel fuel as a backup. The boilers are used to provide heat/steam to various portions of the sulfur transfer operation in order to maintain the sulfur in a molten state. Only one boiler is typically in operation at any given time, and they are periodically rotated into service to maintain their service and maintenance. The boilers have been determined to be exempt from permitting.

Location: 3411 Port Sutton Road, Tampa

UTM: 17-359.7 E 3087.3 N FACILITY ID NO: 0570455

EU ID No.:
001 – Two Truck Loading Stations
002 – Tank No. 1
003 – Tank No. 2
004 – Tank No. 3
006 – Tank No. 5
007 – Marine Vessel

Replaces Permit No.: 0570455-008-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 all 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 sulfur system shall not exceed 10% opacity except during ship unloading when visible emissions from the molten sulfur storage tanks shall not exceed 15% opacity. [Chapter 1-3.52(2)(a)(3), Rules of the EPC]

**5.** [Reserved.]

**6.** The maximum molten sulfur storage tank throughput shall not exceed 1,000,000 long tons per year combined. The maximum molten sulfur truck loading rate shall not exceed 270 long tons per hour and 1,000,000 long tons per year. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; and Construction Permit No. 0570455-007-AC]

**7.** The hours of operation are not limited (8,760 hrs/yr). [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(2), F.A.C.]

**9.** In order to show compliance with Specific Condition No. 4, the following restrictions shall apply: [Rule 62-4.070(3), F.A.C.; and Permit Nos. 0570455-007-AC and 0570455-003-AO]

A) Submerged filling techniques shall be utilized to fill the storage tanks.
B) Truck loading shall be done through a drop tube.
C) All pressure relief valves on the storage tanks shall be maintained and only opened in case of emergency. The primary vent from the tanks shall be exhausted through the control systems (i.e. collection boxes).
D) Both truck loading stations may be in operation simultaneously, as long as they remain in compliance with the visible emission standard.
E) The maximum ship unloading rate to the storage tanks is 1,200 long tons per hour.
F) The maximum truck loading rate of each truck loading station is 135 long tons per hour.

SPECIFIC CONDITIONS:

G) The control systems on each storage tank shall be monitored and maintained to ensure proper operation and integrity of the hoses and collection boxes.

**10.** The permittee shall employ, at a minimum, the following practices to minimize emissions from the molten sulfur handling facility: [Rule 62-4.070(3), F.A.C.]

A) All molten sulfur 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 areas surrounding points where molten sulfur pipes are routinely disconnected and areas where molten sulfur is routinely transferred to trucks shall be paved and curbed, or shall be provided with noncorrosible drip pans or other secondary containment to adequately contain spills.
C) Spills of molten sulfur shall be collected and disposed of as soon as possible.

**11.** Test both truck loading stations and the exhausts from all four storage tanks for visible emissions annually each federal fiscal year between October 1 and September 30, with a target date of November 2nd. Submit two copies of test data to the Air Management Division 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., and visible emissions shall be recorded from the point of highest observed opacity for each emission unit.
[Rules 62-297.310 and 62-4.070(3), F.A.C.]

**12.** 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 incorporated in Rule 62-297, F.A.C. The EPA Method 9 observation period shall be at least thirty (30) minutes in duration. If the sulfur loading operation is normally completed within less than 30 minutes and does not recur within that time, the test shall last the length of the loading operation. The visible emissions tests of trucks shall be conducted while actively loading the trucks. 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.
[Rule 62-297.310(4)(a), F.A.C.]

**13.** Compliance testing of the truck loading and tank loading operations required by Specific Condition No. 11 shall be conducted with the units operating at capacity. Capacity is defined as 90-100% of the maximum permitted filling/transfer rate allowed by permit. Testing of tank loading shall occur while each tank is loaded at its maximum typical loading rate. 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. The filling/transfer rates for each source shall

SPECIFIC CONDITIONS:

be specified in the test results. Failure to submit the operating rate and actual operating conditions may invalidate the test and fail to provide reasonable assurance of compliance.
[Rules 62-4.070(3) and 62-297.310(2)(b), F.A.C.]

**14.** 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.]

**15.** In order to demonstrate compliance with Specific Condition No. 6, the following records shall be maintained for the most recent three year period and shall be made available to the Environmental Protection Commission of Hillsborough County upon request: [Rules 62-4.160(14) and 62-4.070(3), F.A.C.]

A) Monthly total sulfur receiving rate (long tons/month) and cumulative total for the previous 12-consecutive month period (long tons/year)
B) Monthly total sulfur loadout rate to trucks (long tons/month) and cumulative total for the previous 12-consecutive month period (long tons/year)
C) Records of monthly inspection and maintenance procedures performed on the control systems on the tanks as required by Specific Condition No. 16

**16.** In order to ensure proper operation of the control systems on the four storage tanks, the following inspection and maintenance procedures shall be performed at least monthly on each control system:
[Rule 62-4.070(3), F.A.C.]

A) Visually inspect each control system to ensure its integrity and proper operation. Specifically note any holes or tears in the collection boxes or duct hoses and observe the immediate area for any accumulated build-up of sulfur particulate.
B) Perform necessary maintenance to address any problems discovered during inspection.
C) Tap or shake the duct hoses to ensure that sulfur particulates accumulated on the interior walls of the duct hoses fall to the collection boxes.
D) Following procedure from B), remove the accumulated sulfur particles from the interior of the collection box.

**17.** The permittee shall comply with the attached *Tank Inspection Program* (including the *Tank Inspection and Maintenance Profile),* and maintain records of all corresponding inspections and maintenance performed on the tanks. The Tank Inspection Program (including the *Tank Inspection and Maintenance Profile)* is an enforceable part of this permit. [Rule 62-4.070(3), F.A.C.]

SPECIFIC CONDITIONS:

**18.** The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying 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.

**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. Reasonable precautions shall include, but not limited to, the following: [Rules 62-296.320(4)(c) and 62-4.070(3), F.A.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.
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 reentrainment and from building or work areas to reduce airborne particulate matter.

**20.** 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 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.]

**21.** 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(187), 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.

**22.** The permittee shall apply for a timely revision of this permit, if affected by the promulgation or modification of federal NESHAP for this type of operation. [Rule 62-4.070(3), F.A.C.]

SPECIFIC CONDITIONS:

**23.** If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Air 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.]

**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 and include the appropriate fee. 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

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Richard D. Garrity, Ph.D.
Executive Director