Florida Department of
Environmental Protection
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

FINAL PERMIT

PERMITTEE

Logistec USA, Inc.
300 Tampa Bay Way, Suite 2
Palmetto, FL 34221

Authorized Representative:
Mr. Andre Dubois, Director of Operations

Air Permit No. 0810229-003-AC
Permit Expires: 04/23/2014
Site Name: Logistec – Port Manatee
Minor Air Construction Permit
Project Name: Construction Modification

This is the final air construction permit to modify a bulk material handling operation. The proposed work will be conducted at the Logistec – Port Manatee site (Standard Industrial Classification No. 4491). The facility is located in Manatee County at Port Manatee in Palmetto, Florida. The UTM coordinates are Zone 17, 345.95 km East, and 3057.68 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, 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 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 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

Kelley M. Boatwright 10/19/12

Kelley M. Boatwright Effective Date
District Air Permitting Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on the date indicated below to the persons listed below.

Mr. Andre Dubois, Director of Operations
Logistec USA, Inc.
adubois@logistec.com

Mr. Richard J. Powell, P.E.
Environmental Consulting & Technology, Inc.
dpowell@ectinc.com

Danielle Henry, SWD Air Compliance Manager (Danielle.D.Henry@dep.state.fl.us)

Clerk Stamp

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

Carol S. Moore 10/19/12
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The existing facility is a dry bulk material ship to hopper(s) to truck(s) transferring operation at Port Manatee, which consists of the following emissions unit.

ID No.	Emission Unit Description
001	Bulk Materials Ship Unloading

Project Description and Affected/Proposed Emission Units

This construction permit allows additional bulk materials to be handled and changes the facility from a natural minor facility to a synthetic minor facility by modifying Emission Unit No. 001 and adding new Emission Unit No. 002.

Existing Emission Unit No. 001 – Bulk Materials Ship Unloading will be modified as follows:

- Allow the trucks filled with bulk materials to not only drive off-site with the material as currently permitted, but to also allow the trucks to unload the bulk material in Warehouse No. 10 and/or Warehouse No. 11 located at Port Manatee.
- Add two (2) emission points located inside the warehouses and identify the points as: 1) truck(s) to stacker belts(s) and 2) stacker belt(s) to storage pile(s)
- Allow additional bulk materials to be handled

Proposed Emission Unit No. 002 – Bulk Materials Truck/Railcar Shipping from Warehouse(s) will add the following three (3) emission points:

- Front-end loader to truck(s) inside the warehouse(s)
- Truck(s), that don't drive off-site, to railcar loader(s) outside the warehouse(s)
- Railcar loader(s) to railcar(s) outside the warehouse(s)

ID No.	Emission Unit Description
001	Bulk Materials Ship Unloading
002	Bulk Materials Truck/Railcar Shipping from Warehouse(s)

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutant PM_{10}. The restriction on the types and amount of material transferred along with limiting the number of transfer points in this permit will ensure that the facility's PM_{10} emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

Modifies and Replaces Permit No. 0810229-001-AC
Also see Permit No. 0810229-002-AF

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Southwest District Office
   Air Resource Management Section
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-632-7600

   All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Southwest District Office's Air Resource Management Section (see above mailing address and phone number).

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions; and
   d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
   [Rule 62-4.080, F.A.C.]

6. Modifications: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
   [Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Application for Non-Title V Air Operation Permit: This permit authorizes modification of a bulk materials handling operation and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit(s). The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation or commencing operation as modified. {Also see Specific Condition No. 9 below} Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Non-Title V air operation permit, the applicant shall submit the following:

   a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

   b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and

   c. copies of the most recent month of records/logs specified in Specific Condition Nos. A.6. and B.5.

   The application shall be submitted to the Permitting Authority.

   [Rules 62-4.030, 62-4.050, and 62-4.220, F.A.C.]

9. Notification Requirement: The permittee shall submit a written notification to the Permitting Authority of the date Emission Unit No. 001 is modified (trucks transporting material to either warehouse) and the date when Emission Unit No. 002 commenced operation (trucks transporting material out of either warehouse) within 15 days of such date(s).
[Rule 62-4.070(3), F.A.C.]

A. EU No. 001 – Bulk Materials Ship Unloading

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	This emissions unit consists of the use of portable on-shore clamshell bucket(s) and/or ship's clamshell bucket(s) to unload dry bulk materials from a ship's hold and place it into portable onshore hopper(s). A hopper consists of an elevated open-topped, sloped-wall unit that receives material from the hold of the ship via clamshell bucket(s). The hoppers can be operated independently or any two (2) hoppers can be attached forming a common side. Material deposited by the clamshell buckets(s) into two (2) attached hoppers can be discharged into each hopper and/or both hoppers simultaneously. Each hopper discharges the material through a smaller metal clamshell opening beneath the hopper into a truck. The truck(s) loaded from the hopper(s) either drive off-site or transport the loaded material to stacker belt(s) for unloading inside Warehouse No. 10 and/or Warehouse No. 11 located at Port Manatee. Particulate matter emissions from this emission unit are expected to occur from the following four (4) emission point activities: 1) Clamshell Bucket(s) to Hopper(s); 2) Hopper(s) to Truck(s); 3) Truck(s), that don't drive off-site, to Stacker Belt(s) inside Warehouse No. 10 and/or Warehouse No. 11; and 4) Stacker Belt(s) to Storage Pile(s) inside Warehouse No. 10 and/or Warehouse No. 11. The bulk material ship unloading operation may be located at any one of the berths at Port Manatee.

PERFORMANCE RESTRICTIONS

A.1. Hours of Operation: The hours of operation are not limited (8,760 hours per year).
[Rule 62-210.200(PTE), F.A.C.]

A.2. Permitted Capacity: The total amount of material transferred from the ship's hold(s) via clamshell bucket(s) to hopper(s) shall not exceed 1,000,000 ton per any consecutive 12-month period.
[Rule 62-210.200(PTE), F.A.C.]

A.3. Authorized Materials: The following materials may be transferred:

Ranking	Material(s)	Moisture %	[1]PM (lbs./ton)	[1]PM_{10} (lbs./ton)
1	Granulated Sulfate of Potash Magnesium (granulated)	0.6	0.02547	0.01205
1	Ammonium Nitrate (prilled)	0.6	0.02547	0.01205
1	Calcium Ammonium Nitrate (prilled)	0.6	0.02547	0.01205
2	Granular Muriate of Potash (granulated)	1.0	0.01246	0.00589
2	Salt/Evaporated Salt/Sea Salt	1.0	0.01246	0.00589

A. EU No. 001 – Bulk Materials Ship Unloading

Ranking	Material(s)	Moisture %	[1]PM (lbs./ton)	[1]PM_{10} (lbs./ton)
2	Standard Sulfate of Potash (fine grade)	1.0	0.01246	0.00589
2	Granular Sulfate of Potash (granulated)	1.0	0.01246	0.00589
3	Grains	1.0	0.0097	0.0097 [2]
3	Millscale	1.0	0.0097	0.0097 [2]
3	Limerock Stone (aggregate)	1.0	0.0097	0.0097 [2]
3	Flyash/Bed Ash	1.0	0.0097	0.0097 [2]
3	Petcoke/Coke	1.0	0.0097	0.0097 [2]
3	Monoammonium Phosphate (MAP)/Granular Monoammonium Phosphate (GMAP)/Standard Monoammonium Phosphate (SMAP)/GMAP 1152/GMAP 1056/Potassium Monoammonium Phosphate (KMAP) (not oiled)	1.0	0.0097	0.0097 [2]
3	Diammonium Phosphate (DAP)	1.0	0.0097	0.0097 [2]
3	Ammonium Sulfate (AS)	1.0	0.0097	0.0097 [2]
4	Standard Muriate of Potash (fine grade)	1.5	0.00706	0.00334
5	Stone Rock	N/A [3]	0.0069 [4]	0.0033 [4]
5	Gravel	N/A [3]	0.0069 [4]	0.0033 [4]
6	Sugar	1.6	0.00645	0.00305
7	Glass/Glass Culets	1.7	0.00593	0.00280
8	Granular Triple Super Phosphate (GTSP)	1.50	0.0055	0.0055
8	Magnesium Sucrate	1.50	0.0055	0.0055
9	Phosphate Rock (fine product)	2.0	0.00472	0.00233
10	Animal Feed Phosphate/Biofos/Dynaphos/Bio-Feed/Bio-Feed(M)/Animal Feed Ingredient (AFT)/DiCal/MCP/DCP	1.8	0.0043	0.0043 [2]
11	Sand/Rultile Sand/Mineral Sand/Silica	2.0	0.0037	0.0037 [2]
12	Compound/Mixed Fertilizer/ ANK/Ammonium Nitrate with Potassium	3.0	0.00268	0.00127

A. EU No. 001 – Bulk Materials Ship Unloading

Ranking	Material(s)	Moisture %	[1]PM (lbs./ton)	[1]PM_{10} (lbs./ton)
13	Magnetite/Ferrous Oxide	4.0	0.00179	0.00085
13	Coal Slag/Slag	4.0	0.00179	0.00085
13	Iron Scrap Metal	4.0	0.00179	0.00085
13	Wood Chips	4.0	0.00179	0.00085
14	Ferrous Sulfate/Iron Ore	4.0	0.0014	0.0014 [2]
14	Filler Material	4.0	0.0014	0.0014 [2]
14	Peanut Hulls	4.0	0.0014	0.0014 [2]
15	Bauxite (with dust suppressant)	4.0	0.0010	no data
15	Limerock Stone Aggregate/57 Stone	6.0	0.0010	0.00048
15	Monoammonium Phosphate (MAP)/Granular Monoammonium Phosphate (GMAP)/Standard Monoammonium Phosphate (SMAP)/GMAP 1152/GMAP 1050/Potassium Monoammonium Phosphate (KMAP) [Prilled/Granular Products/Oiled]	1.0	0.0010	0.0010
15	Limerock Stone/Aggregate/Dolomite	5.2	0.0010	0.0010
15	Vermiculite/Verlite (medium-sized flakes)	6.5	0.0070	0.0070
17	Pumice	6.5	0.00091	0.00043
18	Wood Pellets	9.0	0.00057	0.00027
19	Citrus Pellets	9.3	0.00055	0.00026
20	Coal	8	0.00050	0.00050 [2]
21	Citrus Chips or Flakes	9.3	0.00040	0.00040 [2]
21	Gypsum	10.0	0.00040	0.00040 [2]
22	Kieserite/MGO	12.0	0.00030	0.00030 [2]
23	Urea (prilled)	16.0	0.00026	0.00012
24	Calcium Nitrite (CN)	15.0	0.00020	0.00020 [2]
25	Aluminum Hydrate	34.5	0.00010	0.00010 [2]

[1] Emission factors were calculated using conservative moisture contents provided by suppliers and other sources for use in the continuous drop equation AP-42 (13.2.4).
[2] Emission factors were not provided in the application, they are conservatively considered to be the same as emission factors for PM.
[3] Moisture content unknown
[4] Emission factors from Table 11.12-2, Concrete Batching, Aggregate Transfer

Permitting Note: Ranking No. - The Department considers a material with a lower ranking number (e.g., 1) to emit more emissions of unconfined particulate matter (i.e., "dustier") than a material with a higher ranking number (e.g., 25).

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

A.4. Additional Authorized Materials: Materials that are not listed in Specific Condition No. A.3. and have a PM emission factor greater than 0.00706 (lbs./ton) must have prior approval from the Department before being handled. Materials that are not listed above and have an emission factor less than or equal to 0.00706 (lbs./ton) do not need prior approval from the Department before being handled. Written notification of the material(s) data to include the type of material and the PM and PM_{10} emission factors must be submitted to the Department at least 5 working days prior to the date of transferring the material(s) whether prior approval is needed or not.
[Rule 62-4.070(3), F.A.C.]

A.5. Reasonable Precautions to Control Unconfined Particulate Matter: All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter. This provision is applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, and handling. Reasonable precautions shall include but are not limited to the following:

a. The clamshells are bulk material reclaim clamshell buckets with a metal to metal bevel lip seal. Once the material is taken from the vessel hold in the clamshells, the crane operator shall move it upward slowly to ensure that any possible leakage/overage will remain in the hold of the vessel. When material is secured in the clamshells, the crane operator will then move the clamshells to be directly over the hopper if only one hopper is being loaded or directly over the area where the hoppers are connected (splitter) if two hoppers are being loaded before opening the clamshells and releasing the material into the hopper(s).

b. The hoppers are equipped with a walkway safety handrail. The top of the handrail is at the same elevation as the top of the hoppers. Anchorage points for windscreens extend vertically upward from the top of the handrails to an elevation 4 feet above the top of the hoppers. The windscreens shall be in place on three sides when the two hoppers are joined to allow the clamshell to swing directly over the hoppers and discharge material below the top of the windscreens. Windscreens shall also be in place on three sides if only one hopper is being loaded and the clamshell releases below the top of the

windscreen. Windscreens are not necessary if only one hopper is being loaded and the clamshell releases material below the top of the hopper.

c. Hopper(s) shall be equipped prior to start of operations with tarps that will effectively prevent crosswinds from increasing possible leakage and/or emissions from the bottom of the hopper(s) when trucks are being loaded.

d. On the underside of each hopper is a clamshell air operated spout to load trucks. Rubber/plastic curtains are installed to reduce possible emissions from the opening of the release clamshell. The rubber/plastic curtains will have a length of at least 1 foot, effectively reducing the open distance between the truck and the hopper spout and reducing the distance of the drop of the material handled.

e. At all times during the vessel discharge operations, the permittee shall provide labor and equipment to clean up areas where material spillage has occurred. Should spillage occur, a front end loader with operator shall load spilled material and transfer it into a truck to be hauled to client offsite storage at no more than 8-hour increments.

f. Fans and air blowers shall not be used as part of these operations.

g. The doors on Warehouse Nos. 10 and 11 shall be closed except during periods when the stacker belt is transferring material to storage piles and/or when trucks are transporting material into that associated warehouse.

[Rule 62-296.320(4)(c), F.A.C.]

RECORDS AND REPORTS

A.6. Operation Records: In order to accurately complete the annual operating report (AOR) required in Section 2. Specific Condition No. 7. and document continuing compliance with Specific Condition Nos. A.2. and A.3., the following records shall be kept:

Daily (when operating):

a. Facility name, Facility ID (0810229), Emission Unit ID No. (EU 001);
b. Date (month/day/year);
c. Name of each material transferred;
d. Total amount of each material transferred to the hopper(s) in tons; and
e. Total amount of each material transferred to Warehouse No. 10 and to Warehouse No. 11 in tons.

Monthly

f. Facility name, Facility ID (0810229), Emission Unit ID No. (EU 001);
g. Date (month/year);
h. Total amount of each material transferred to the hopper(s) in tons;

i. Most recent consecutive 12-month period total amount of all materials transferred to the hopper(s) in tons; and

{Permitting Note: For warehouse emission calculation purposes to complete an AOR, the total amount of each material transferred shall be multiplied by the PM & PM_{10} emission factors shown in Specific Condition No. A.3., then multiplied by two (2) since there are two (2) transfer points inside each warehouse, and apply a 90% emission control factor.}

Daily records shall be completed within 3 business days and monthly records shall be completed by the end of the following month. These records shall be maintained at the facility for at least 3 years and made available to the Department upon request.
[Rule 62-4.070(3), F.A.C.]

B. EU No. 002 - Bulk Materials Truck/Railcar Shipping from Warehouse(s)

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
002	This emissions unit consists of bulk material placed in the storage piles in Warehouse Nos. 10 and 11 from the trucks associated with Emission Unit No. 001. Inside each warehouse front-end loaders transfer bulk material from the storage piles to trucks. The trucks transport the bulk material outside the warehouse for off-site delivery or to railcar loader(s). Each railcar loader then transfers the bulk material to a railcar.

PERFORMANCE RESTRICTIONS

B.1. Hours of Operation: The hours of operation are not limited (8,760 hours per year).
[Rule 62-210.200(PTE), F.A.C.]

B.2. Permitted Capacity: The limitations of Specific Condition No. A.2. limit the potential emissions from this emission unit.
[Rule 62-210.200(PTE), F.A.C.]

B.3. Authorized Materials: The authorized materials for this emission unit are the same bulk materials in Specific Condition Nos. A.3. and A.4.
[Rule 62-210.200(PTE), F.A.C.]

B.4. Reasonable Precautions to Control Unconfined Particulate Matter: All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter. This provision is applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, and handling. Reasonable precautions shall include but are not limited to the following:

a. The doors on Warehouse Nos. 10 and 11 shall be closed except during periods when the front-end loaders are loading trucks and/or when trucks are transporting material out of that associated warehouse.

[Rule 62-296.320(4)(c), F.A.C.]

RECORDS AND REPORTS

B.5. Operation Records: In order to accurately complete the annual operating report (AOR) required in Section 2. Specific Condition No. 7., the following records shall be kept:

Daily (when operating):

a. Facility name, Facility ID (0810229), Emission Unit ID No. (EU 002);
b. Date (month/day/year);
c. Name of each material transferred;

d. Total combined amount of each material transferred from front-end loader(s) in both warehouses to truck(s) in tons; and

e. Total combined amount of each material transferred out of Warehouse Nos. 10 and 11 by truck(s) to the railcar stacker(s) in tons **OR** the total combined amount of each material transferred from railcar stacker(s) to railcar(s) in tons.

For warehouse emission calculation purposes to complete an AOR, the total amount of each material transferred shall be multiplied by the PM & PM_{10} emission factors shown in Specific Condition No. A.3., then apply a 90% emission control factor.

For railcar loading emission calculation purposes to complete an AOR, the total amount of each material transferred shall be multiplied by the PM & PM_{10} emission factors shown in Specific Condition No. A.3., then multiplied by two (2) since there are two (2) transfer points for the loading of a railcar.

Daily records shall be completed within 3 business days and monthly records shall be completed by the end of the following month. These records shall be maintained at the facility for at least 3 years and made available to the Department upon request.
[Rule 62-4.070(3), F.A.C.]