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

DRAFT PERMIT

PERMITTEE
HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713

Authorized Representative:
Mr. Tim Hagan, President

Air Permit No. 1030153-013-AC
Permit Expires: 05/01/2013
Minor Air Construction Permit
Project Name: Add natural gas as a fuel for the oil heater

This is the final air construction permit, for the addition of natural gas as a fuel for the oil heater. The proposed work will be conducted at HOWCO Environmental Services (Standard Industrial Classification No. 4953). The facility is located in Pinellas County at 843 43rd Street South in St. Petersburg, Florida. The UTM coordinates are Zone 17, 333.23 km East, and 3071.93 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

DRAFT

_____ _____

Robert C. Wong Effective Date
District Air Program 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 _____ to the persons listed below.

Mr. Tim Hagan, President
HOWCO Environmental Services
thagan@howcousa.com

Mr. Richard Dillen, Quality Assurance Officer
HOWCO Environmental Services
rdillen@howcousa.com

Mr. Kenneth E. Given, P.E.
Air Testing & Consulting
Ken@airtest.fdn.com

Mr. Gary Robbins, Environmental Program Coordinator
Pinellas County Air Quality Division
grobbins@pinellascounty.org

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.

DRAFT

_____ _____
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This facility recycles used oils. The incoming used oil is stored and then processed into on-specification industrial fuels meeting ASTM standards. These fuels are then marketed to licensed industrial burners in Florida. The facility consists of the following emissions units.

Facility ID No. 1030153	
ID No.	Emission Unit Description
001	Air Stripper No. 1
003	Oil Recycling Operation
004	Air Stripper No. 2

Project Description and Affected Emission Units

This project adds natural gas as an authorized fuel to burn in the oil heater. This project will modify the following emissions unit.

Facility ID No. 1030153	
ID No.	Emission Unit Description
003	Oil Recycling Operation

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 volatile organic compounds (VOC).

PERMIT HISTORY/AFFECTED PERMITS

Modifies Construction Permit No. 1030153-010-AC.

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

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 Pinellas County Air Quality Division. The mailing address and phone number of the Local Air Program is:

Pinellas County Air Quality Division
300 South Garden Avenue
Clearwater, FL 33756
Telephone: 727-464-4422

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.
e. Appendix E. "Oil Processing – Opening Thermal Valves (switching cookers 100/101)" identified as HWI-501, Rev: 2, and dated 12/7/09.

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 the permitted emissions unit 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. 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. 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.17. and A.18.

The application shall be submitted to the Permitting Authority with a copy to the Pinellas County AQD (Compliance Authority).

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

9. Fugitive VOC/Organic Solvents (OS) - The permittee shall not store, pump, handle, process, load, unload, or use in any process or installation, volatile organic compounds (VOC), Hazardous Air Pollutants (HAPs), or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. The following procedures shall be utilized to minimize pollutant emissions:

a. maintain tightly fitting cover, lids, etc. on all containers of OS/VOC/HAPs when they are not being handled, tapped, etc.;

b. all VOC/HAPs fittings, valve lines, etc. shall be properly maintained;

c. all VOC/HAPs spills shall be attended to immediately and the waste properly disposed of, recycled, etc.;

d. all solvent from solvent washings (equipment clean-up) shall be directed into containers that prevent evaporation to the atmosphere; and

e. prevent excessive air turbulence across exposed VOC/OS.

[Rule 62-296.320(1), F.A.C.]

10. Objectionable Odor - The permittee shall not cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An objectionable odor is any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.
[Rules 62-296.320(2) and 62-210.200(181), F.A.C.; Pinellas County Code, Section 58-178]

11. Testing Notification - The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

Permitting Note: The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.}

[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

12. Recordkeeping Retention - All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained at the facility for at least 3 years following the date on which such measurements, records, or data are recorded, unless otherwise specified by Department rule. Records shall be made available to the Permitting Authority and Compliance Authority upon request.
[Rules 62-4.070(3) and 62-4.160, F.A.C.]

13. Recordkeeping Frequency - Monthly records shall be completed by the end of the following month.
[Rule 62-4.070(3), F.A.C.]

A. Emission Unit No. 003 – Oil Recycling Operation

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
003	The oil recycling operation consists of one (1) oil heater, two (2) heated oil tanks (cookers) and a condensing unit. Waste oil is heated in the tanks to a maximum of 275 degrees Fahrenheit to remove water. The tanks are "cooked" until the residual water content is 2% or less (approximately 10 hours). Vapors are condensed using one or two cooling fans. During this process, negligible amounts of volatile organic compounds (VOC) are released (< 0.0005 TPY) from a storage tank with a charcoal filter. An oil heater is used to heat the tanks. The oil heater is a Gencor Vertical Helical Coil Thermal Fluid Heater, Model DE 63S. The heater is fired with No. 2 fuel oil with a maximum sulfur content of 0.5% or reclaimed (used) fuel oil with a maximum sulfur content of 0.75%, at a maximum fuel firing rate of 302,220 gallons per any consecutive 12- month period. It can also be fired with natural gas at a maximum fuel firing rate of 54.229 million ft^3 per any consecutive 12-month period. The condensing unit evaporates any gasoline in the waste oil and condenses it for reuse. VOC emissions from gasoline storage are vented through a charcoal filter for control. VOC emissions from the condensing unit are negligible (< 0.01 TPY).

PERFORMANCE RESTRICTIONS

A.1. Hours of Operation - This emission unit is permitted for continuous operation (8,760 hours/year).
[Rule 62-210.200 ("Potential to Emit"), F.A.C.]

A.2. Authorized Fuels - The oil heater is authorized to burn the following fuels:

a. Natural gas;

b. No. 2 fuel oil with a maximum sulfur content of 0.5% by weight; and

c. Reclaimed (used) fuel oil with a maximum sulfur content of 0.75% by weight.

[Rule 62-210.200 ("Potential to Emit"), F.A.C.]

A.3. Natural Gas Usage Rate – The natural gas firing rate to the oil heater shall not exceed 54.229 million ft^3 per any consecutive 12-month period.

(Permitting Note: This corresponds to 6,190 ft^3/hour which is the rate to be used during testing. See Specific Condition No. A.10.)

[Rule 62-210.200 ("Potential to Emit"), F.A.C.]

A.4. Fuel Oil Usage Rate - The fuel oil firing rate (No. 2 or reclaimed) to the oil heater shall not exceed 302,220 gallons per any consecutive 12-month period.

(Permitting Note: This corresponds to 34.5 gallons/hour which is the rate to be used during testing. See Specific Condition No. A.10.)

[Rule 62-210.200 ("Potential to Emit"), F.A.C.]

A.5. Reclaimed Fuel Oil Limitations - Reclaimed (used) fuel oil fired in the oil heater shall comply with the following:

Constituent/Property	Allowable Level
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	Shall not exceed 4000 ppm[1]
Flash Point	See note [2] below
PCB's	Shall be less than 2 ppm[3]

1 Records must be maintained on site that document that the oil fired in the heater came from non-hazardous sources in accordance with HOWCO's Used Oil Processor Permit.

2 Minimum of 100° F flash point for delivered fuel oil and <100° F flash point for on-site blended fuel oil.

3 Required to be capable of firing used oil during startup and shutdown. Firing of 2 ppm or greater PCB containing used oil is prohibited.

[Rules 62-4.070(3) and 62-710.210 F.A.C.; 40 CFR 761.20(e)(2) and (3); 40 CFR 279.11, and 40 CFR 279.60(a)(2); Construction Permit 1030153-010-AC]

A.6. Operation Requirements - When re-directing the oil heater's thermal oil coming from the burner to the correct processing oil tanks (cookers), the permittee shall follow the Work Instructions titled "Oil Processing – Opening Thermal Valves (switching cookers 100/101)" identified as HWI-501, Rev: 2, and dated 12/7/09 (Appendix E), unless prior written authorization from the Compliance Authority is obtained.
[Rule 62-4.070(3), F.A.C.; Construction Permit 1030153-010-AC]

EMISSIONS STANDARDS

A.7. Visible Emission Limitation - Visible emissions from the oil heater's exhaust stack shall not be equal to or greater than 20% opacity.
[Rule 62-296.320(4)(b), F.A.C.; Construction Permit 1030153-010-AC]

TESTING REQUIREMENTS

A.8. Visible Emission Testing Requirement - The oil heater's exhaust stack shall be tested for visible emissions at least 105 days prior to and no more than 365 days prior to the expiration date of this permit.
[Rule 62-297.310(7)(a)3., F.A.C.]

A.9. Test Method - Required tests shall be performed in accordance with the following reference method.

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method(s) are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.
[Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

A.10. Test Requirements – Fuel Firing Rate - Testing shall be conducted at 90-100% of the maximum rate of 34.5 gallons/hour if firing with fuel oil or 6,190 ft^3/hour if firing with natural gas. *(See Specific Condition Nos. A.3. and A.4.)*

(Permitting Note: This requirement supersedes the testing rate requirement in Appendix D.1. The remaining requirements of Appendix D (Common Testing Requirements) still apply.)

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

A.11. Test Requirement – Fuel Type

a. a passing compliance test conducted when the oil heater was fired with natural gas will allow the heater to only be fired with natural gas and up to a total of 400 hours on No. 2 or reclaimed fuel oil. Within 30 days of exceeding the 400th hour of firing the heater with No. 2 or reclaimed fuel oil, a new compliance test shall be conducted with the heater being fired with reclaimed fuel oil if it was burned at any time during the 400 hour period. If reclaimed fuel oil was not burned during this time the test shall be conducted while burning No. 2 fuel oil.

b. a passing compliance test conducted when the burner is fired with No. 2 fuel oil will allow the burner to be only fired with natural gas, No. 2 fuel oil and up to 400 hours of reclaimed fuel oil. Within 30 days of exceeding the 400th hour of firing the burner with reclaimed fuel oil, a new test shall be conducted while firing reclaimed fuel oil.

c. a passing compliance test conducted when the burner is fired with reclaimed fuel oil will allow the burner to be fired with natural gas, No. 2 fuel oil or reclaimed fuel oil.

[Rules 62-297.310(2), 62-297.310(7)(a), and 62-297.310(8), F.A.C.]

MONITORING REQUIREMENTS

A.12. Fuel Oil Analysis - On-site blended reclaimed fuel oil shall be analyzed monthly using appropriate ASTM or EPA approved methods.
[Rule 62-4.070(3), F.A.C.]

NOTIFICATION REQUIREMENTS

A.13. Test Notification - The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

(*Permitting Note: The notification should also include the relevant emission unit ID No., test method to be used, and pollutants to be tested.*}

[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

A.14. Notification of Construction Completion - The permittee shall notify the Compliance Authority in writing no later than fifteen (15) days after the date the modification to burn natural gas in the oil heater is completed.
[Rule 62-4.070, F.A.C.]

RECORDS AND REPORTS

A.15. Test Reports - The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(8), F.A.C.]

A.16. Additional Test Report Requirements - Visible emission test reports shall be submitted within 45 days of testing to the Compliance Authority and include the following:

a. A statement of the type of fuel fired during the test period;

b. A statement of the actual fuel firing rate during the test period in gallons/hour or ft^3/hour;

c. Fuel oil analysis/certification of the sulfur content for the type of fuel oil used during the test period (if applicable);

d. If reclaimed fuel oil was used during the test period, a copy of the reclaimed fuel oil's analysis/certification to document compliance with the reclaimed fuel oil specifications in Specific Condition No. A.5.; and

e. A copy of the records required by Specific Condition No. A.17. for the month the visible emission test was conducted.

[Rules 62-297.310(8) and 62-4.070(3), F.A.C.]

A.17. Operating Records - In order to document compliance with the requirements of Specific Condition Nos. A.2. - A.4., the permittee shall keep the following records monthly:

a. facility name, facility ID No., emission unit ID No., and description (Oil Recycling Operation);

b. date (month/year);

c. amount of natural gas used, in ft^3;

d. most recent consecutive 12- month period total amount of natural gas used in million ft^3/consecutive 12- month period;

e. amount of No. 2 fuel oil used, in gallons;

f. most recent consecutive 12- month period total amount of No. 2 fuel oil used, in gallons/consecutive 12- month period;

g. amount of reclaimed fuel oil used, in gallons; and

h. most recent consecutive 12- month period total amount of reclaimed fuel oil used, in gallons/consecutive 12- month period.

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

A.18. Fuel Oil Analysis – The following records shall be kept;

a. Reclaimed fuel oil analysis reports (i.e., copies of the Certificate of Analysis) shall be kept for each delivery of reclaimed fuel oil; and

b. Records of the sulfur content, in % by weight, of the fuel oil used in the oil heater shall be kept on either vendor provided as-shipped analysis or on analysis of as-received samples taken at the plant. The analysis shall be determined by the appropriate ASTM method(s).

[Rule 62-4.070(3), F.A.C.; Construction Permit 1030153-010-AC]

A.19. Additional Fuel Oil Usage Recordkeeping - If the last visible emission compliance test was conducted when the oil heater was fired with No. 2 fuel oil, the permittee shall keep a daily record of oil heater's operating hours while firing reclaimed fuel oil, along with a cumulative total of the operating hours of using reclaimed fuel oil since the last compliance test. If the last visible emission compliance test was conducted when the oil heater was fired with natural gas, the permittee shall keep a daily record of the oil heater's operating hours while firing No. 2 fuel oil and reclaimed fuel oil, along with a cumulative total of the operating hours while burning each fuel since the last compliance test.

Permitting Note: When the cumulative operating hours of using No. 2 fuel oil and/or reclaimed fuel oil since the last compliance test exceeds 400 hours, then additional compliance testing is required per Specific Condition No. A.11.

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