Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Electronically Sent- Received Receipt Requested

FINAL PERMIT

PERMITTEE

TRANSFLO Terminal Services, Inc.
500 Water Street, MS J975
Jacksonville, FL 32202

Authorized Representative:
Ms. Jan Barnes, Director of Health, Safety, Environmental, and Quality

Air Permit No. 1170379-009-AF
Permit Expires: 01/31/2017
Site Name : Sanford Facility
Minor Source Air Federally Enforceable State Operating Permit (FESOP)
Project Name: FESOP Renewal

This is the final air operation permit, which authorizes operation of a Bulk Solids & Liquids Transfer Facility. TRANSFLO Terminal Services, Inc. Sanford, FL Facility (Standard Industrial Classification No. 4226 is located in Seminole County at 2591 West 5th Street in Sanford, Florida. The UTM coordinates are Zone 17, 471.69 km East, and 3186.61 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Facility-wide and Emissions Unit Specific Conditions

Section 4. Appendices

Because of 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.

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 Orange County, Florida

Caroline Shine

Caroline D. Shine
Air Program Administrator
Central District

January 27, 2012
Effective Date

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

January 27, 2012 to the persons listed below.

Ms. Jan Barnes, TRANSFLO Terminal Services, Inc. **(jbarnes@transflo.net)**
Dr. Mitchell J. Hait, P.E., **(haitinc@gmail.com)**

Clerk Stamp

FILED, on this date, pursuant to Section 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Tracy L Agner

Digitally signed by Tracy L Agner
DN: cn=Tracy L Agner, o=Central District, ou=FDEP, email=tracy.agner@dep.state.fl.us, c=US
Date: 2012.01.27 13:44:20 -05'00'

(Clerk) January 27, 2011 (Date)

FACILITY AND PROJECT DESCRIPTION

TRANSFLO Terminal Services, Inc. Sanford, Florida Facility

This facility is a bulk solids and liquids transfer station that moves the solids and liquids between railcars and tanker trucks. It includes 12 bulk solids transfer units equipped with baghouses to control particulate emissions, and a liquids transfer system that uses a vapor balance system to control VOC/HAPS emissions.

The facility transfers bulk organic liquids from railcars directly to tanker trucks with no immediate storage. It transfers the bulk solid materials between railcars and trucks by utilizing portable belt conveyors and one in-ground conveyor for bulk aggregates, and a pneumatic transfer system for fine materials like cement. Although the bulk solid materials are primarily loaded from railcar to truck, it can also be loaded from truck to railcar.

The existing facility consists of the following emissions units.

Facility ID No. 1170379	
ID No.	Emission Unit Description
001	Bulk Solids/controlled with 12 unit baghouse system and Liquids Transfer/controlled with a vapor balance system

Project Description

The purpose of this project is to renew the Air FESOP No. 1170379-008-AF.

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 (HAP).
- 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 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 total volatile organic compounds (VOCs), total HAPs, and individual HAPs.

PERMIT HISTORY/AFFECTED PERMITS

Replaces Permit No. 1170379-006-AF and Permit Revision (Project No. 1170379-008-AF).

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

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

   Florida Department of Environmental Protection
   Central District Office
   Air Resource Management Section
   3319 Maguire Blvd., Ste. 232
   Orlando, FL 32803-3767 Telephone: 407-897-4100

   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 Central District 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. Operation Permit Renewal Application: A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of the operation permit. To properly apply for an 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. copy of the most recent compliance test report required by Specific Condition No. **A.7.,** if not previously submitted.

   [Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

A. EU No. 001 – Bulk Solids and Liquids Transfer

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	The facility includes a bulk solids transfer system with 12 transfer units, each equipped with a baghouse that is approximately 90% efficient to control particulate emissions. The facility also includes a liquids transfer system that uses a vapor balance system, except for very low vapor pressure liquids, that is approximately 90% efficient to control VOC/HAP emissions.

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity: The maximum permitted throughput rates shall not exceed the following:

Product	Maximum Throughput (tons per any consecutive 12-month period)
Bulk Solids	400,000
Portland Cement	100,000

[Rule 62-210.200(PTE), F.A.C.]

A.2. Permitted Capacity: The maximum permitted throughput for organic liquids is 311,000,000 gallons per any consecutive 12-month period. The permittee shall use vapor balance controls for the transfer of liquids with a vapor pressure (measured at 78 degrees F) of at least:

a) 0.5 psia for materials containing at least 5% VOC and less than 5% HAP
b) 1.0 psia for materials containing at least 5% HAP

[Rule 62-210.200(PTE), F.A.C.]

A.3. VOC or Organic Solvents (OS) Limitations: The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. To comply, procedures to minimize pollutant emissions shall include the following:

a) Tightly cover or close all VOC containers when they are not in use;
b) Tightly cover, where possible, all open troughs, basins, baths, tanks, etc. when they are not in use;
c) Maintain all piping, valves, fittings, etc. in good operating condition;
d) Prevent excessive air turbulence across exposed VOCs; and
e) Immediately confine and clean up VOC spills and make sure certain wastes are placed in closed containers for reuse, recycling or proper disposal.

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

A.4. Restricted Operation: The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

A. EU No. 001 – Bulk Solids and Liquids Transfer

EMISSIONS STANDARDS

A.5. General Visible Emissions (VE) Limitation: Visible emissions from each emissions source which emits particulates must comply with Rule 62-296.320(4)(b)1., F.A.C., and are limited to less than 20 percent opacity.

A.6. VOC/HAP Emissions Limitations: Facility-wide, the maximum permitted emissions are the following:

Pollutant	Emissions (tons per any consecutive 12-month period)
Total VOCs	Less than 25.0
Total HAPs	Less than 25.0
Individual HAPs	Less than 10.0

[Rule 62-210.200, (PTE) and 62-210.300(2)(b)1.d., F.A.C.; Permit No. 1170379-007-AC]

TESTING REQUIREMENTS

A.7. Compliance Tests: Each emission point which emits particulates must be tested for visible emissions, specified in Specific Condition **A.5**., at least 90 days prior to the expiration date of this operation permit.
[Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]

A.8. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

A.9. Test Method(s): Required tests shall be performed in accordance with the following reference method(s).

DEP Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources. **Test shall last 30 minutes or the length of the batch/cycle.**

The above method(s) are described in 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.]

A.10. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, subsequent emissions unit operation is limited to 110 percent of the test load until a

new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rule 62-297.310(2), F.A.C.]

NOTIFICATION REQUIREMENTS

A.11. Test Notification: The permittee shall notify the Compliance Authority, 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 test contact person who will be responsible for coordinating and having such test conducted for the permittee.
[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

RECORDS AND REPORTS

A.12. 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.13. Monthly Recordkeeping Requirements: In order to document compliance with Specific Condition Nos. **A.1., A.2.,** and **A.6.,** the permittee shall keep a monthly log. The log shall be completed by the end of the following month and retained on file at the facility for at least five (5) years. The monthly log shall contain the following:

Monthly
a) Facility Name, Facility ID No. (i.e., 1170379);
b) Month and year of record;
c) Consecutive 12 month total of facility-wide emissions of total VOC, total HAPs, and individual HAPs; and
d) Consecutive 12 month total of material throughput/transfer rates.

The emission estimates shall be prepared based on AP-42, Section 5.2, version 1995 or later or an alternative method using generally accepted engineering techniques that are submitted to the FDEP for approval. **The monthly logs shall be completed by the end of the following month**.

Note: A consecutive 12-month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12-month totals using whatever number of months of data are available until such a time as a consecutive 12-month total can be maintained each month. [Rule 62-4.070(3), F.A.C.]

A.14. Supporting Documentation: Supporting documentation (chemical usage tracking logs, MSDS sheets, purchase orders, EPA "As Supplied" data sheets, EPA Method 24, etc.) shall be kept for each chemical and associated products which includes sufficient information to determine usage rates and emissions. These records shall be made available to the Department upon request. Documentation of each chemical reclaimed will use a mass balance method to determine usage/emissions (amount used minus amount collected for disposal or recycle). The log and documents shall be kept at the facility for at least five (5) years.
[Rule 62-4.070(3), F.A.C.]

A.15. Additional Recordkeeping Requirements: Records specified in Specific Condition No. **A.13.** above, must document the method, calculations, and formulas used in determining the usage rate and the emission rate. All calculations, including those used to derive emissions, must be clearly documented, and may be presented in the form of a template of sample calculations and available for review on site by the Department.
[Rule 62-4.070(3), F.A.C.]