

## Bahtic, Nedin

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**From:** Berman, Stephen [berman.stephen@cleanharbors.com]  
**Sent:** Monday, January 16, 2012 9:19 AM  
**To:** Stubbs, Danny  
**Cc:** Bahtic, Nedin; Zhang-Torres  
**Subject:** RE: Air Permit

Understood. OMG Once again it seems our own permit submission continues to inadvertently create technical obstacles without actual emission consequences.

I actually thought we did permitted the facility to stay under certain total emissions (Title V) and that we just listed all operations conducted which had emissions and assigned worse case numbers in order to track and limit volumes for an overall emission footprint. I think we need a better engineering firm next time.

We will definitely need to make these off sets as soon as possible to allow such flexibility.

What would it take to have a permit based on total emissions?

As an alternate: Is there any fast track permit mod, construction permit or perhaps even a written variance to allow these off sets since temporary will more likely mean 1 yr plus.

We don't want to spend a year plus tracking zero emissions from tanks while getting closer and closer to exceeding one limitation.

If I put a million gallons through the 300 series product tank, I stay under the permit limit but generate emissions of 35 tons of VOCs.

If allowed the offset I will have zero emissions for those tanks plus the associated loading / unloading and only generate a half ton (0.5) of VOCs via fuel blend tank – resulting in a significant decrease overall. What a mess.

Drums Received (Sampling/unloading)	3556	2839	36,154	72,000 Drums
Benzene Processed for NESHAP Facilities	0	0	0.000	10 MG
Benzene Processed for Non-NESHAP Facilities	0.296	0.3255	3.00	1000 MG
Operating Hours for Can Crusher	0	0	33	420 Hours
Fuel Blending Tanks (total)	6820	3145	155,549	168,000 GAL
T-112	6820	3145	155,549	
T-114	0	0	0	
Crude Storage Tanks (T-101 - T-110)	29675	42922	425,522	5,000,000 GAL
Product Storage Tanks (T-301 - T-310)	0	1000000	1,038,501	3,050,000 GAL
Tanker Loading Crude Storage	29675	42922	425,522	5,551,000 GAL
Tanker Loading Product Storage	0	1000000	1,038,501	3,050,000 GAL
<b>EMISSIONS</b>				
<b>Description</b>	<b>November</b>	<b>December</b>	<b>Annual Total (TONS)</b>	
Drums Received (Sampling/unloading)	28.448	22.712	0.144616	CONTAINER EMISSIONS
<b>HAPS TOTAL LBS</b>	652.568828	717.605249		6608.3617
Benzene Processed for NESHAP Facilities	0	0		0.462585319
Benzene Processed for Non-NESHAP Facilities	652.568828	717.605249		<b>0.000231293</b>
LBS Emissions Can Crusher	0	0	0.06666	
Fuel Blending Tanks (total)	47.74	22.015	0.5444215	
T-112	47.74	22.015		
T-114	0	0		
Crude Storage Tanks (T-101 - T-110)	2077.25	3004.54	14.89327	
Product Storage Tanks (T-301 - T-310)	0	70000	36.347535	
Tanker Loading Crude Storage	20.7725	30.0454	0.1489327	
Tanker Loading Product Storage	0	700	0.36347535	
<b>TOTAL MONTHLY VOC IN LBS</b>	<b>2174.2105</b>	<b>73779.3124</b>	<b>52.36429455</b>	<b>TOTAL ANNUAL TOI</b>

**From:** Stubbs, Danny [mailto:Danny.Stubbs@dep.state.fl.us]

**Sent:** Friday, January 13, 2012 5:32 PM

**To:** Berman, Stephen

**Cc:** Bahtic, Nedin; Zhang-Torres

**Subject:** RE: Air Permit

Unfortunately you cannot offset volumetric limits from one process to another because the volumetric limits are specific conditions in the permit that cannot be exceeded.

This permit indirectly controls emissions with tanks throughputs.

If your facility was permitted based on a total allowable emissions limit instead of tank throughput limits, you would have that flexibility.

If “temporary’ is a significant period of time, you may want to consider submitting a construction permit application requesting the proposed offset you have specified below as alternate limits.

Please let me know if decide to pursuit one of this option.

Regards.

**Danny Stubbs**

Engineering Specialist III  
Air Resource Management  
FDEP Southwest District  
Ph. 813-632-7600 Ext. 159  
fax 813-632-7668

*Please Note: This staff assessment is preliminary, and is designed to assist in the review of the information provided prior to final agency action. The comments provided herein are not the final position of the department and may be subject to revision pursuant to additional information and further review. Florida has a very broad public records law. Most written communications to or from officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.*

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**From:** Berman, Stephen [mailto:berman.stephen@cleanharbors.com]  
**Sent:** Friday, January 13, 2012 4:41 PM  
**To:** Stubbs, Danny  
**Cc:** Bahtic, Nedin; Zhang-Torres  
**Subject:** RE: Air Permit

Thank You Sir, appreciate the clarification assistance.

I have one last question.

Can we offset current volumetric limits from one process to another while the tanks are not going to have anything going through them.

Meaning, we will not increase any “Total” emission limitation but shift what can be emitted from one to the other – just temporarily?

If I were to use the tracking record as a graphic aid (with simple math) this is what my question looks like:

Description	2011 November	2011 December	Rolling Annual Total	Regulatory Limit
Drums Received (Sampling/unloading)	3556	2839	36,154	72,000 Drums
Benzene Processed for NESHAP Facilities	0	0	0.000	10 MG
Benzene Processed for Non-NESHAP Facilities	0.296	0.3255	3.00	1000 MG
Operating Hours for Can Crusher	0	0	33	420 Hours
Fuel Blending Tanks (total)	6820	3145	155,549	168,000 GAL
T-112	6820	3145	155,549	
T-114	0	0	0	
Crude Storage Tanks (T-101 - T-110)	29675	42922	425,522	5,000,000 GAL
Product Storage Tanks (T-301 - T-310)	0	0	38,501	3,050,000 GAL
Tanker Loading Crude Storage	29675	42922	425,522	5,561,000 GAL
Tanker Loading Product Storage	0	0	38,501	3,050,000 GAL
<b>EMISSIONS</b>				
Description	November	December	Annual Total (TONS)	
Drums Received (Sampling/unloading)	28.448	22.712	0.144616	CONTAINER EMISSIONS
HAPS TOTAL LBS	652.568828	717.605249		6608.3617
Benzene Processed for NESHAP Facilities	0	0		0.462585319
Benzene Processed for Non-NESHAP Facilities	652.568828	717.605249		0.000231293
LBS Emissions Can Crusher	0	0	0.06666	
Fuel Blending Tanks (total)	47.74	22.015	0.5444215	DO
T-112	47.74	22.015		
T-114	0	0		
Crude Storage Tanks (T-101 - T-110)	2077.25	3004.54	14.89327	
Product Storage Tanks (T-301 - T-310)	0	0	1.347535	DE
Tanker Loading Crude Storage	20.7725	30.0454	0.1489327	
Tanker Loading Product Storage	0	0	0.01347535	

Operative word being “temporarily” we would of course shift back and re-evaluate before putting any new 300 series tanks up again.

*Steve*

Steve Berman, CHMM  
 Environmental Compliance Mgr  
 Clean Harbors Florida  
 170 Bartow Municipal Airport  
 Bartow, Florida 33830  
 Clean Harbors La Porte  
 500 Independence Pkwy South  
 La Porte, TX 77571  
 Office: 863.519.6319  
 Fax: 863.519.6363  
 Email: [berman.stephen@cleanharbors.com](mailto:berman.stephen@cleanharbors.com)  
 Web: [www.cleanharbors.com](http://www.cleanharbors.com)

**From:** Stubbs, Danny [<mailto:Danny.Stubbs@dep.state.fl.us>]  
**Sent:** Friday, January 13, 2012 3:15 PM  
**To:** Berman, Stephen  
**Cc:** Bahtic, Nedin; Zhang-Torres  
**Subject:** RE: Air Permit

Good Afternoon Mr. Berman.

To answer your question regarding the removal of the T-300 tanks, notification is not required.

However, before you begin the process of installing new replacing the tanks, please be sure to contact us because a construction permit may be necessary.

Thanks for informing us of the changes at the facility and if you have any additional questions, please feel free to call or email.

**Danny Stubbs**

Engineering Specialist III  
Air Resource Management  
FDEP Southwest District  
Ph. 813-632-7600 Ext. 159  
fax 813-632-7668

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*Please take a few minutes to share your comments on the service you received from the department by clicking on this link. [DEP Customer Survey](#).*

**From:** Berman, Stephen [<mailto:berman.stephen@cleanharbors.com>]  
**Sent:** Friday, January 13, 2012 12:04 PM  
**To:** Stubbs, Danny  
**Cc:** Bahtic, Nedin  
**Subject:** RE: Air Permit

Good Morning Gentlemen;

Hope you both are well and had a fun holiday season.

Been a while since we last communicated regarding our current permit.

Need to discuss a project with you both and how to ensure we proceed on our end with applicable requirements.

We have placed our ten product tanks out of service due to the fact they have reached their end of life and need to be replaced.

They are the T-300 series tanks reflected in our permit and on the attached monthly tracking form.

Based on my review:

Permit requires notification and approval for any changes which may increase emissions but nothing about lowering them.  
Permit requires notification and approval of pollution control device / equipment removal but these tanks are not control device / equipment.

We want to physically remove the tanks, they have already been capped off and placed out of service since 9/2011.

This is not a shutdown of the operation – we do not want to permanently remove them from the permit.

It is however our policy and requirement to physically remove them within a year of placing them out of service.

The current economy / business does not justify the replacement costs and investment today, so it may be a while before they would be replaced.

It will also take some time to remove them. What (if any) notification requirements apply?

We would like to start the physical removal soon while we have it budgeted and the ability to schedule a service group to begin the process.

*Steve*

Steve Berman, CHMM  
Environmental Compliance Mgr  
Clean Harbors Florida  
170 Bartow Municipal Airport  
Bartow, Florida 33830  
Clean Harbors La Porte  
500 Independence Pkwy South  
La Porte, TX 77571  
Office: 863.519.6319  
Fax: 863.519.6363  
Email: [berman.stephen@cleanharbors.com](mailto:berman.stephen@cleanharbors.com)  
Web: [www.cleanharbors.com](http://www.cleanharbors.com)

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