



Environmental Protection and Growth Management Department
ENVIRONMENTAL ENGINEERING AND PERMITTING DIVISION
1 North University Drive, Mailbox 201, Plantation, Florida 33324
954-519-1483

PERMITTEE

TRANSFLO Terminal Services, Inc.
500 Water Street
Jacksonville, Florida 32202

Air Permit No. 0112074-009-AO
Air Operation Permit

Authorized Representative: Ms. Jane Barnes, Director HSE&Q

PROJECT

This is the final air operation permit, which authorizes TRANSFLO Terminal Services, Inc. (TRANSFLO) to operate a material transloading facility, a bulk solids and liquid transfer operation. Bulk solids are transported from rail cars to a bulk elevator via a screw conveyor and then to tanker trucks. No permanent storage tanks or silos are authorized by this permit. Bulk liquids are transferred from rail cars to tanker trucks and vice versa. This permit is a renewal of the operation permit 0112074-008-AO. There are no changes in applicable requirements and no changes were requested by the applicant.

The facility is categorized under Standard Industrial Classification (SIC) No. 4789 and North American Industry Classification Standard (NAICS) Code 488210. The geographic coordinates are Zone 17, 583.0 km East and 2887.7 km North. Lat/Long: 26°6'030" N / 80°10'00" W.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and 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.

Permitting Authority: Applications for air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4 and 62-210 of the Florida Administrative Code (F.A.C.). The Permitting Authority responsible for making a permit determination for this project is the Environmental Engineering and Permitting Division (EPPD). EPPD's physical address is: 1 North University Drive, Mailbox 201, Plantation, Florida 33324. EPPD's mailing address is: 1 North University Drive, Mailbox 201, Plantation, Florida 33324. The Permitting Authority's telephone number is 954-519-1483.

Petitions. A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of the Broward County Attorney at 115 S. Andrews Avenue, Room: 423, Fort Lauderdale, Florida 33301-1872 (Telephone: 954-357-7600, Fax: 954-357-7641). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the EPPD's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency

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determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EEPD's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Effective Date: This permitting decision is final and effective on the date filed with the clerk of the EEPD unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the EEPD.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Office of the Broward County Attorney at 115 S. Andrews Avenue, Room: 423, Fort Lauderdale, Florida 33301-1872 (Telephone: 954-357-7600, Fax: 954-357-7641). al 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 EEPD.

0112074-009-AO Effective Date: November 20, 2018

Renewal Date: September 20, 2023

Expiration Date: November 20, 2023

Executed in Plantation, Florida

Robert Wong
Environmental Program Supervisor
Environmental Engineering and Permitting Division

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CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Air Permit package 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 following persons.

Ms. Jan M. Barnes, TRANSFLO Terminal Services, jbarnes@transflo.net

Ms. Becky Heilman, TRANSFLO Terminal Services, bheilman@transflo.net

Ms. Diane Pupa, Permitting Program Administrator, Florida Department of Environmental Protection/Southeast District, diane.pupa@dep.state.fl.us.

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.

Clerk Stamp

SECTION 1. GENERAL INFORMATION

FACILITY DESCRIPTION

TRANSFLO Terminal Services, Inc. (TRANSFLO) operates a material transloading facility, a bulk solids and liquid transfer operation. Bulk solids that include Portland cement, rice, plastic pellets, lime and limestone among others are transported from rail cars to a bulk elevator via a screw conveyor and then to tanker trucks. The bulk liquids including, but not limited to, gasoline, ethanol, diesel fuel, pentane, ethylene glycol, petroleum naphtha, animal tallow, petroleum oils, envirodiesel and fuel additives are transferred from rail cars to tanker trucks and vice versa. No permanent storage tanks or silos are authorized by this permit.

The existing facility consists of the following emission units.

Facility ID No. 0112074	
ID No.	Emission Unit Description
004	Bulk liquids transfer operation. This operation includes the transfer of bulk liquids between rail cars and trucks. A vapor balance system with submerged filling is used for materials with a total VOC and HAP partial pressure of at least 0.9 psia as measured at 78 ^o F.
005	Bulk solids transfer operation. This emission unit includes six transfer units with baghouses that do not exceed a design flow of 2,000 dscfm, and six transfer units with baghouses that do not exceed a design flow of 1,000 dscfm, to control particulate matter emissions.

APPLICABLE REGULATIONS

A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
<i>Federal Rule Citations</i>	
N/A	
<i>State Rule Citations</i>	
Rule 62-4.070(3), F.A.C., Reasonable Assurance	004, 005
Chapter 403, Florida Statutes	Facility-Wide
Rule 62-4, F.A.C. – Permits	”
Rule 62-4.030, F.A.C. - Concealment of Emissions	”
Rule 62-210, F.A.C. - Stationary Sources	”
Rule 62-210.300(2) (a) 2, F.A.C. – Maintenance of air pollution control equipment	”
Rule 62-210.650, F.A.C. - Circumvention of air pollution control equipment	”
Rule 62-296.320(1) (a), F.A.C. - VOC or Organic Solvent Emissions	”
Rule 62-296.320(2), F.A.C. - Objectionable Odor*	”
Rule 62-296.320(4) (b), F.A.C. - General Visible Emissions Standards	”
Rule 62-296.320(4) (c), F.A.C. - Unconfined Emissions of Particulate Matter	”

*Not federally enforceable

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate 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, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Environmental Engineering and Permitting Division (EPPD). EPPD mailing address is 1 North University Drive, Mailbox 201, Plantation, Florida, 33324. All documents related to permit applications to operate, construct or modify an emissions unit shall be submitted to EPPD's mailing address, or to email address airlicense@broward.org.
2. Compliance Authority: The compliance authority for the facility is EPPD. All documents related to compliance activities such as reports, tests, and notifications shall be submitted to EPPD's mailing address above or to email address aircompliance@broward.org.
3. Appendices: The following Appendices are attached as part of this permit: Appendix A. Citation Formats and Glossary of Common Terms, Appendix B. General Conditions, Appendix C. Common Conditions.
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: No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Renewal: Prior to 60 days before the expiration date of this permit, the permittee shall apply for a renewal of the permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 60 days before 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 EPPD. [Rule 62-4.090, F.A.C.]
8. Annual Operating Report (AOR): The information required by the Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the EPPD unless the annual operating report is submitted using the DEP's electronic annual operating report software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. [Rule 62-210.370(3), F.A.C.]

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: <http://www.dep.state.fl.us/air/emission/eaor>. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.

SECTION 3. FACILITY- WIDE CONDITIONS

1. **Not Federally Enforceable. Objectionable Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An “objectionable odor” means 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. This provision is not federally enforceable.
[Rule 62-296.320(2), F.A.C. and 62-210-200 (Definitions), F.A.C.]
2. **General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions.** The permit shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the EEPD.
[Rule 62-296.320(1), F.A.C.]
3. **General Visible Emissions.** No person shall cause, let, permit, suffer or allow to be discharged into the outdoor atmosphere any air pollutants from sources, the opacity of which is equal or greater than 20 percent. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4) (b), F.A.C.]
4. **Circumvention.** No person shall circumvent any air pollution device or allow the emission of air pollutants without the applicable air pollution control device operating properly.
[Rule 62-210.650, F.A.C.]
5. **Concealment and Maintenance**
 - (1) **Concealment.** Any stationary installation which will reasonably be expected to be a source of pollution shall obtain an appropriate and valid permit, unless exempted by rule. Furthermore, no person shall build, erect, install, or use any article, machine, equipment or other contrivance, the use of which will conceal any emission which would otherwise constitute a violation of any applicable provisions. [Rule 62-4.030, F.A.C.]
 - (2) **Maintenance.** No person shall operate any air pollution control equipment or systems without proper maintenance to assure compliance with applicable emission limits.
[Rule 62-210.300(2)(a) 2, F.A.C.]
6. **Unconfined Emissions of Particulate Matter (PM).** No person shall cause, let, permit, suffer or allow the emissions of unconfined PM from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent and/or control unconfined particulate matter emissions include the following:
 - a. Paving and maintenance of roads, parking areas and yards.
 - b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
 - c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, openstock piles and similar activities.
 - d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
 - e. Landscaping or planting of vegetation.
 - f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.In determining what constitutes reasonable precautions for a particular facility, the EEPD shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.
[Rule 62-297.320(4) (c), F.A.C.]

SECTION 3. FACILITY- WIDE CONDITIONS

7. Special Compliance Tests. When EEPD, 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 a EEPD rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the EEPD.

[Rule 62-297.310(7) (b), F.A.C.]

8. Facility Wide VOC, Total HAP and Individual HAP Emissions. In order to avoid major source (Title V) applicable standards, the volatile organic compounds (VOC) emissions shall be less than 100 tons in any consecutive twelve - month period, the individual hazardous air pollutants (HAP) emissions shall be less than 10 tons in any consecutive twelve - month period and the total HAP emissions shall be less than 25 tons in any consecutive twelve- month period.

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

SECTION 4. EMISSIONS UNITS SPECIFIC CONDITIONS

A. EU 004, 005

This section of the permit addresses the following emissions units:

EU No.	Emission Unit Description
004	Bulk liquids transfer operation. This operation includes the transfer of bulk liquids between rail cars and trucks. A vapor balance system with submerged filling is used for materials with a total VOC and HAP partial pressure of at least 0.9 psia as measured at 78° F.
005	Bulk solids transfer operation. This emission unit includes six transfer units with baghouses that do not exceed a design flow of 2,000 dscfm, and six transfer units with baghouses that do not exceed a design flow of 1,000 dscfm, to control particulate matter emissions.

EMISSIONS STANDARDS

1. Maximum Throughput for Portland Cement and Bulk Solid Materials. The maximum throughput for Portland Cement shall not exceed 100,000 tons in any consecutive twelve- month period and for other bulk solid materials shall not exceed 400,000 tons in any consecutive twelve- month period.
[Air Construction Permit 0112074-002-AC; Rule 62-4.070(3) F.A.C.]
2. Maximum Throughput for Liquid. The maximum throughput for VOC or HAP containing liquids of various vapor pressures shall not exceed 177,550,000 gallons in any consecutive twelve- month period. Also, vapor balance controls will be used for the transfer of liquids with a with a total VOC and HAP partial pressure (measured at 78 degrees Fahrenheit) of at least 0.9 psia.
[Air Construction Permit 0112074-006-AC; Rule 62-4.070(3) F.A.C.]

COMPLIANCE TESTING REQUIREMENTS

3. Leakage Detection Testing: The Permittee will employ a combination of odor detection and visual recognition by the employees to detect any leaking components during liquid transfer. Valves and flanges will be visually inspected daily before the liquid transfer operation begins and an olfactory sniff test shall be performed during operation. If leakage is detected, the transfer operation shall cease until the leaking component is either repaired or replaced. Records of maintenance including repairs and parts replacement shall be kept on site and shall be available for inspection at all times.
[Air Construction Permits 0112074-002-AC and 0112074-006-AC, Rule 62-4.070(3), F.A.C.]

RECORDKEEPING AND REPORTING REQUIREMENTS

4. Recordkeeping. The permittee shall maintain records of bulk solid and liquid material throughputs including vapor pressure of liquid materials, to demonstrate compliance with Specific Conditions #1 and #2. A monthly log shall be kept at the facility for this purpose and shall be made available to EPPD staff upon request. The log shall be completed by the end of the following month and retained on file at the facility for five years. The monthly log shall contain the following:
 - a) Month of record.
 - b) Consecutive 12-month total of:
 - i) Total bulk solids throughput
 - ii) Total liquid throughput
 - iii) VOC emissions
 - iv) Total HAP emissions
 - v) Individual HAP emissions

SECTION 4. EMISSIONS UNITS SPECIFIC CONDITIONS

A. EU 004, 005

The emission estimates shall be prepared based on AP-42 Section 5.2, version June 2008 or later; or an alternative method using generally accepted engineering technique. Supporting documentation e.g. material throughput rates, chemical usage tracking logs, MSDS, purchase orders, EPA VOC Data Sheets “As Supplied” and other available documentation shall be kept for each material and associated products. It shall include sufficient information to determine usage rates and VOC and HAP emissions. For mass balance approach, documentation of each material reclaimed will contain enough information to determine net usage (e.g. amount used minus amount collected for disposal or recycle). The permittee shall submit to EEPD for review if any change in emission estimates method of calculation occurs.

[Rule 62-210.370(2)(h) and 62-4.070(3) F.A.C]