Permittee:
TRANSFLO Terminal Services, Inc.
6735 Southpoint Drive South
Jacksonville, FL 32216

DRAFT Permit No.: 0310325-005-AC
Facility ID No.: 0310325
SIC No(s).: 42
Project: Bulk Material Transfer

This permit is for the construction/modification of the existing bulk material transfer operation. This facility is located 116 Railroad - Druid Street, Jacksonville, FL 32226; UTM Coordinates: Zone 17, 430.98 km East and 3354.96 km North; Latitude: 30° 19' 35" North and Longitude: 81° 43' 04" West.

This permit is issued under the provisions of Chapter 403, Florida Statutes (FS) and Florida Administrative Code (FAC) Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the Environmental and Compliance Department, Environmental Quality Division (Department) in accordance with the terms and conditions of this permit.

Operating Application Due Date:
Expiration Date:

Environmental and Compliance Department
Environmental Quality Division

_____
Robert Steven Pace, P.E., Manager
Air Quality Branch

RSP/JW/hds

Section I. Facility Information

Subsection A. Facility/Project Description

This permit is for the modification of Emission Unit (EU) 001 and the construction of three conveyor lines and associated baghouses for the existing bulk solid material transfer operation. Bulk solids shall include, but not be limited to petroleum coke, cement, corn starch, corn cob grit, soda ash, and quicklime.

The facility is a minor source of air pollution because the potential emissions of regulated air pollutants are less than 100 tons per year pursuant to Chapter 62-210, FAC, and Rule 2.301, Jacksonville Environmental Protection Board (JEPB).

Subsection B. Summary of Emission Unit (EU) ID Nos. and Brief Descriptions

EU No.	EU Description	Control Device (s)
004	Bulk Solids Transfer	Unimaster Dust Filter and Conveyor Collector Baghouse, Model No. UMA 150 (stationary unit)
005	Bulk Solids Transfer	Unimaster Dust Filter and Conveyor Collector Baghouse, Model No. UMA 150 (portable unit)
006	Bulk Solids Transfer	Donaldson Dust Filter and Conveyor Collector Baghouse or similar device (portable unit)
007	Bulk Solids Transfer	Donaldson Dust Filter and Conveyor Collector Baghouse or similar device (portable unit)
008	Bulk Solids Transfer	Donaldson Dust Filter and Conveyor Collector Baghouse or similar device (portable unit)

Subsection C. Relevant documents

Permit No.: 0310325-004-AO
Air construction permit application received January 24, 2008
Additional information received March 6, 2008

Section II. Facility Wide Conditions

Subsection A. General Conditions

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, FS. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific process and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in subsections 403.087(6) and 403.722(5), FS, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:

   a. Have access to and copy any records that must be kept under conditions of the permit;
   b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
   c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

   Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

   a. A description of and cause of noncompliance; and
   b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, FS. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, FAC, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:
    ( ) Determination of Best Available Control Technology (BACT)
    ( ) Determination of Prevention of Significant Deterioration (PSD)
    ( ) Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
    ( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following:

    a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
    b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by this permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
    c. Records of monitoring information shall include:
        1. The date, exact place, and time of sampling or measurements;
        2. The person responsible for performing the sampling or measurements;
        3. The date(s) analyses were performed;
        4. The person responsible for performing the analyses;
        5. The analytical techniques or methods used;
        6. The results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.
    [Rule 62-4.160, FAC, and Rule 2.1301, JEPB]

Subsection B. Specific Conditions

1. Any revision(s) to a permit (and application) shall be submitted to and approved by the Department prior to implementing.
   [Rule 62-4.080(2), FAC, and Rule 2.1301, JEPB.]

2. The construction/modification shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, the Department must be notified in writing sixty (60) days prior to the expiration of the construction permit. A new schedule and request for an extension of the construction permit must be submitted.
   [Rule 62-4.080(2), FAC, and Rule 2.1301, JEPB]

3. To obtain a permit to operate, the permittee must submit a complete application for an Air Operating Permit to the Department, at least ninety (90) days prior to the expiration date of the construction permit but no later than 225 days after completion of construction, whichever occurs first. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid operating permit to operate.
   [Rule 62-210.300(2), FAC, FAC, and Rule 2.301, JEPB]

4. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants, which cause or contribute to an objectionable odor.
   [Rule 62-296.320(2), FAC, and Rule 2.1001, JEPB]

5. The facility shall be subject to City of Jacksonville Ordinance Code, Title X, Chapter 360 [Environmental Regulation], Chapter 362 [Air and Water Pollution], Chapter 376 [Odor Control], and JEPB Rule 1, [Final Rules with Respect to Organization, Procedure, and Practice].

6. The facility shall be subject to JEPB Rule 2, Part Nos. I through VII, and Part Nos. IX through XIII.

7. Excess emissions resulting from startup, shutdown, or malfunction of any emission unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Permitting Authority in accordance with Rule 62-4.130, FAC and Rule 2.1301, JEPB. A full written report on the malfunctions shall be submitted to the Permitting Authority in a quarterly report, if requested by the Permitting Authority.
   [Rule 62-210.700, FAC, and Rule 2.201, JEPB]

8. Permittee shall notify the Department fifteen (15) days prior to EU testing.
   [Rule 62-297.310(7)(a)(9), FAC, and Rule 2.1101, JEPB]

9. Copies of the test report(s) shall be submitted to the Department within forty-five (45) days of completion of testing.
   [Rule 62-297.310(8)(b), FAC, and Rule 2.1101, JEPB]

10. Testing of emissions shall be conducted with the EU operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the EUs may be tested at less than capacity; in this case subsequent EU operation is limited to 110 percent of the test load until a new test is conducted. Once the EU is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit.
    [Rule 62-297.310(2), FAC, and Rule 2.1101, JEPB]

11. Control equipment shall be provided with a method of access that is safe and readily accessible.
    [Rule 62-4, FAC, and Rule 2.1301, JEPB]

12. Stack sampling ports and platforms shall not be required.

13. The permittee shall notify the Department prior to handling of bulk solid materials not listed above. The facility wide process input rate shall not exceed 260,000 tons per year of bulk solid materials. The facility wide particulate matter (PM) emissions from the facility shall be less than fifteen (15) tons/yr and five (5) pounds per hour (lbs/hr).
    [Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB]

14. The permittee shall submit all compliance related notifications and reports required of this permit to:

Environmental and Compliance Department
Environmental Quality Division
117 West Duval Street, Suite 225
Jacksonville, FL 32202
Telephone: (904) 630-4900
Fax: (904) 630-3638

Section III. Emission Units and Conditions

Emission Unit No. 004- Bulk Solids Transfer

Emission Unit Description: Bulk solids transfer

Control Device: Unimaster Dust Filter and Conveyor Collector Baghouse, Model No.UMA 150 (stationary unit)

Essential Potential to Emit (PTE) Parameters

1. This emission unit shall be allowed to operate continuously; i.e. 8,760 hours per year (hrs/yr).
   [Rule 62-210.200, FAC, and Rule 2.301, JEPB]

2. The nominal volumetric flow rate for this baghouse is 2,000 cubic feet per minute (cfm).
   [Rule 62-210.200, FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

3. The process input rate shall not exceed 260,000 tons per year (tons/yr).
   [Rule 62-210.200, FAC, and Rule 2.301, JEPB]

4. Visible Emissions (VE) shall not exceed five (5) percent opacity.
   [Rule 62-297.620(4), FAC, and Rule 2.1101, JEPB]

Test Methods and Procedures

5. Testing for the demonstration of compliance shall be performed annually from the date of July 1, 2006 in accordance with Environmental Protection Agency (EPA) Reference Method (RM) 9 (as described in 40 CFR 60 Appendix A) for the visual determination of opacity. Testing shall be conducted for a minimum period of 30 minutes.
   [Rule 62-297.310(4)(a)2., FAC, and Rule 2.1101, JEPB]

Recordkeeping and Reporting Requirements

6. A record of all bulk solid transfers, including quantity and type, shall be recorded and maintained for a minimum period of two (2) years and shall be made available to the Department upon request.
   [Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB]

Emission Unit No. 005- Bulk Solids Transfer

Emission Unit Description: Bulk solids transfer

Control Device: Unimaster Dust Filter and Conveyor Collector Baghouse, Model No.UMA 150 (portable unit)

Essential Potential to Emit (PTE) Parameters

1. This emission unit shall be allowed to operate continuously; i.e. 8,760 hrs/yr.
   [Rule 62-210.200, FAC, and Rule 2.301, JEPB]

2. The nominal volumetric flow rate for this baghouse is 2,000 cfm.
   [Rule 62-210.200, FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

3. The process input rate shall not exceed 260,000 tons/yr.
   [Rule 62-210.200, FAC, and Rule 2.301, JEPB]

4. VE shall not exceed 5 percent opacity.
   [Rule 62-297.620(4), FAC, and Rule 2.1101, JEPB]

Test Methods and Procedures

5. Testing for the demonstration of compliance shall be performed annually from the date of July 1, 2006 in accordance with EPA RM 9 (as described in 40 CFR 60 Appendix A) for the visual determination of opacity. Testing shall be conducted for a minimum period of 30 minutes.
   [Rule 62-297.310(4)(a)2., FAC, and Rule 2.1101, JEPB]

Recordkeeping and Reporting Requirements

6. A record of all bulk solid transfers, including quantity and type, shall be recorded and maintained for a minimum period of two (2) years and shall be made available to the Department upon request.
   [Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB]

Emission Unit No. 006- Bulk Solids Transfer

Emission Unit Description: Bulk solids transfer

Control Device: Donaldson Dust Filter and Conveyor Collector Baghouse or similar device (portable unit)

Essential Potential to Emit (PTE) Parameters

1. This emission unit shall be allowed to operate continuously; i.e. 8,760 hrs/yr.
   [Rule 62-210.200, FAC, and Rule 2.301, JEPB]

2. The nominal volumetric flow rate for this baghouse shall be approximately 2,000 cfm.
   [Rule 62-210.200, FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

3. The process input rate shall not exceed 260,000 tons/yr.
   [Rule 62-210.200, FAC, and Rule 2.301, JEPB]

4. VE shall not exceed 5 percent opacity.
   [Rule 62-297.620(4), FAC, and Rule 2.1101, JEPB]

Test Methods and Procedures

5. Initial VE compliance testing on the Donaldson Dust Filter and Conveyor Collector Baghouse or similar device shall be conducted no later than 180 days after initial start-up. Testing for the demonstration of compliance shall be performed in accordance with EPA RM 9 (as described in 40 CFR 60 Appendix A) for the visual determination of opacity. Testing shall be conducted for a minimum period of 30 minutes.
[Rule 62-297.310(4)(a)2., FAC, Rule 62-4.070, FAC, Rule 2.1101, JEPB, and Rule 2.1301, JEPB]

Recordkeeping and Reporting Requirements

6. A record of all bulk solid transfers, including quantity and type, shall be recorded and maintained for a minimum period of two (2) years and shall be made available to the Department upon request.
[Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB]

Emission Unit No. 007- Bulk Solids Transfer

Emission Unit Description: Bulk solids transfer

Donaldson Dust Filter and Conveyor Collector Baghouse or similar device (portable unit)

Essential Potential to Emit (PTE) Parameters

1. This emission unit shall be allowed to operate continuously; i.e. 8,760 hrs/yr.
[Rule 62-210.200, FAC, and Rule 2.301, JEPB]

2. The nominal volumetric flow rate for this baghouse shall be approximately 2,000 cfm.
[Rule 62-210.200, FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

3. The process input rate shall not exceed 260,000 tons/yr.
[Rule 62-210.200, FAC, and Rule 2.301, JEPB]

4. VE shall not exceed 5 percent opacity.
[Rule 62-297.620(4), FAC, and Rule 2.1101, JEPB]

Test Methods and Procedures

5. Initial VE compliance testing on the Donaldson Dust Filter and Conveyor Collector Baghouse or similar device shall be conducted no later than 180 days after initial start-up. Testing for the demonstration of compliance shall be performed in accordance with EPA RM 9 (as described in 40 CFR 60 Appendix A) for the visual determination of opacity. Testing shall be conducted for a minimum period of 30 minutes.
[Rule 62-297.310(4)(a)2., FAC, Rule 62-4.070, FAC, Rule 2.1101, JEPB, and Rule 2.1301, JEPB]

Recordkeeping and Reporting Requirements

6. A record of all bulk solid transfers, including quantity and type, shall be recorded and maintained for a minimum period of two (2) years and shall be made available to the Department upon request.
[Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB]

Emission Unit No. 008- Bulk Solids Transfer

Emission Unit Description: Bulk solids transfer

Donaldson Dust Filter and Conveyor Collector Baghouse or similar device (portable unit)

Essential Potential to Emit (PTE) Parameters

1. This emission unit shall be allowed to operate continuously; i.e. 8,760 hrs/yr.
   [Rule 62-210.200, FAC, and Rule 2.301, JEPB]

2. The nominal volumetric flow rate for this baghouse shall be approximately 2,000 cfm.
   [Rule 62-210.200, FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

3. The process input rate shall not exceed 260,000 tons/yr.
   [Rule 62-210.200, FAC, and Rule 2.301, JEPB]

4. VE shall not exceed 5 percent opacity.
   [Rule 62-297.620(4), FAC, and Rule 2.1101, JEPB]

Test Methods and Procedures

5. Initial VE compliance testing on the Donaldson Dust Filter and Conveyor Collector Baghouse or similar device shall be conducted no later than 180 days after initial start-up. Testing for the demonstration of compliance shall be performed in accordance with EPA RM 9 (as described in 40 CFR 60 Appendix A) for the visual determination of opacity. Testing shall be conducted for a minimum period of 30 minutes.
   [Rule 62-297.310(4)(a)2., FAC, Rule 62-4.070, FAC, Rule 2.1101, JEPB, and Rule 2.1301, JEPB]

Recordkeeping and Reporting Requirements

6. A record of all bulk solid transfers, including quantity and type, shall be recorded and maintained for a minimum period of two (2) years and shall be made available to the Department upon request.
   [Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB]

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