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## PERMITTEE

Chemtrade Logistics, LLC  
3004 East Clark Street  
Tampa, FL 33605

Authorized Representative:

Paul Spisak, Tampa Plant Supervisor

Air Permit No. 0570229-015-AO

Permit Renewal Application Due Date: August 6, 2023

Permit Expires: October 5, 2023

Air Operation Permit

Liquid Aluminum Sulfate Manufacturing  
Hillsborough County, Florida

## PROJECT

This is the final air operation permit, which authorizes the operation of Chemtrade Logistics, LLC, which is a liquid aluminum sulfate manufacturing facility (Standard Industrial Classification No. 2819). This project renews the operation of the facility. The facility is located in Hillsborough County at 3004 East Clark Street in Tampa, FL. The UTM coordinates are Zone 17, 359.90 kilometers (km) East, and 3092.30 km North.

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 Protection Commission of Hillsborough County (EPC). The Permitting Authority's physical/mailling address is: 3629 Queen Palm Dr., Tampa, Florida 33619. The Permitting Authority's telephone number is 813/627-2600.

**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 Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. 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 Department'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

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## FINAL AIR OPERATION PERMIT

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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 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 Department'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 Permitting Authority 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 Permitting Authority.

**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 Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602, 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 Tampa, Florida.

ENVIRONMENTAL PROTECTION  
COMMISSION OF HILLSBOROUGH COUNTY



Janet L. Dougherty  
Executive Director

## FINAL AIR OPERATION PERMIT

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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.

Paul Spisak – Chemtrade Logistics, LLC [pspisak@chemtradelogistics.com](mailto:pspisak@chemtradelogistics.com)

Tim O'Dell – Environmental Sciences Group [odellt@environmentalsciencesgroup.com](mailto:odellt@environmentalsciencesgroup.com)

**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.

Sahand Nasseni

Clerk

10/5/18

Date

## SECTION 1. GENERAL INFORMATION

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### FACILITY DESCRIPTION

Chemtrade Logistics manufactures liquid aluminum sulfate. The manufacturing process is achieved by mixing finely crushed bauxite, alternate alumina source (AAS) material, sulfuric acid, and water in a 21,840 gallon Batch Reactor Mix Tank, which vents to a scrubber to control emissions.

The manufacturing process begins by receiving raw bauxite and AAS by covered trucks. The materials are unloaded into the material handling building (EU 003) or are unloaded outside and covered with tarps. When needed for production, the material inside the building is transferred by front-end loader to a hopper. The hopper transfers the material to a conveyor, which conveys the material to a hammermill crusher. The hopper, conveyor, and crusher are located inside the material handling building.

From the crusher, the material is transferred to an enclosed conveyor system. The conveyor system conveys the crushed material to an enclosed bucket elevator located on the outside of the material handling building. The bucket elevator transfers the material directly to the Batch Reactor Mix Tank (EU 001) or to a screw conveyor.

The screw conveyor transfers the material to either the Bauxite or AAS Storage Silo (EU 004) or directly to the Railcar/Truck Loadout (EU 002) system. The Railcar/Truck Loadout system is used to load crushed raw materials into railcars or trucks for shipment offsite. When needed in production, the material from the silo is transferred to a second screw conveyor, which conveys the material back to the bucket elevator.

Particulate matter (PM) emissions from the hammermill crusher and the belt conveyor transfer point are controlled by an EVO Corporation Baghouse, Model No. 84NF036C. The baghouse vents inside the material handling building. A cloth filter controls particulate matter emissions from the loading of the Bauxite/AAS storage silo. In addition, the particulate matter emissions from the Railcar/Truck Loading operation are controlled by the use of a cloth filter that is placed over the railcar vent.

Sulfuric acid is received by truck and splash loaded into a 30,086 gallon Sulfuric Acid Storage Tank, where it is stored until the material is pumped into the Batch Reactor Mix Tank. Each sulfuric acid tanker truck holds approximately 4,500 gallons of acid, and takes approximately 40-60 minutes to unload.

The batch reaction that the facility currently operates is referred to as a Straight Mix process. In this process, the sulfuric acid and water are mixed in the batch reactor mix tank first, and then the mixture of crushed bauxite combined with AAS is added. The facility has the option of switching to a Reverse Mix Process where water, the mixture of crushed bauxite combined with AAS, and sulfuric acid are mixed at the same time in the batch reactor mix tank.

The batch process takes approximately eight (8) hours to complete. Once completed, the liquid aluminum sulfate is pumped to three (3) 36,000 gallon Aluminum Sulfate Storage Tanks for storage before final loadout into tanker trucks. There is a single truck loading arm, which loads trucks at approximately 350 gallons/minute.

The non-hazardous, un-reacted solids from the batch, referred to as mud, are pumped into two (2) 26,087 gallon Mud Wash Tanks. The mud is mixed with water, polymer, and flocculant (defoamer) to extract any residual alumina remaining in the mud. The polymer is stored in three (3) Polymer Tanks (Tank #1: 235 gallon; Tank #2: 360; Tank #3: 375 gallon). The polymer from the three polymer storage tanks and the flocculant are mixed in two (2) 150 gallon tanks and pumped to the mud wash tanks.

The mud is then pumped into a final 150 gallon tank where additional polymer is added from an additional 150 gallon Polymer Tank before being pumped to the filter press, where the water is removed. From the filter press, the solids are belt conveyed to an intermediate storage area near the filter press, before being transferred, via front-end loader, to the west storage area for storage until the material is shipped off-site. The water that is recovered is reused in the batch reaction process.

## SECTION 1. GENERAL INFORMATION

The reaction in the Batch Reactor Mix Tank is exothermic and generates emissions of particulate matter (PM) and sulfuric acid mist (SAM), which are controlled by a 10,000 acfm, Bionomic Series 4000, cross flow horizontal scrubber. Exhaust from the reactor tank is vented through a duct on the north side of the building to the scrubber and then to a dual stage mesh pad mist eliminator before it is vented to the atmosphere.

Water is sprayed perpendicularly across the mist eliminators at a flow rate of approximately 35 to 50 gpm. The water is then collected in a 500 gallon recycle tank and re-circulated back through the scrubber. An exhaust fan with a variable speed drive ensures that there is sufficient airflow through the scrubber and out the stack.

The scrubber operates from the beginning of each reaction until the reaction is complete, which is approximately 3.5 hours. At that point, the scrubber operation stops and the water that has been re-circulated through the scrubber during the reaction is pumped into the reactor tank to dilute the batch.

The facility also has two (2) Recycled Water Tanks, with a combined capacity of 31,200 gallons (Tank 1: 13,700 gallons; Tank 2: 17,500 gallons), that recycle process water and stormwater runoff. These tanks are exempt from permitting pursuant to Rule 62-210.300(3)(b)1., F.A.C.

The existing facility consists of the following emissions units (EU).

EU No.	Emission Unit Description
001	Batch Reactor Mix Tank
002	Railcar/Truck Loading
003	Material Handling Building
004	200-ton Bauxite/AAS Storage Silo

### APPLICABLE REGULATIONS

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

Regulation	EU No(s).
<i>State Rule Citations</i>	
Rule 62-296.320, F.A.C. - General Pollutant Emission Limiting Standards	001, 002, 003, 004
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (RACT) Particulate Matter	001, 002, 003, 004
Rule 62-296.712, F.A.C. - Miscellaneous Manufacturing Process Operations	001, 002, 003, 004
<i>Local Rule Citations</i>	
Ch. 1-3, Rules of the EPCHC	001, 002, 003, 004

### 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

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- FW.1. Permitting Authority:** The permitting authority for this project is the Environmental Protection Commission of Hillsborough County. The mailing address is 3629 Queen Palm Dr., Tampa, Florida 33619.
- FW.2. Compliance Authority:** All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Environmental Protection Commission of Hillsborough County at: 3629 Queen Palm Dr., Tampa, Florida 33619.
- FW.3. Appendices:** The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements).
- FW.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.
- FW.5. New or Additional Conditions:** For good cause shown and after notice and an administrative hearing, if requested, the EPCHC may require the permittee to conform to new or additional conditions. The EPCHC shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the EPCHC may grant additional time. [Rule 62-4.080, F.A.C.]
- FW.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 EPCHC. 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.]
- FW.7. Compliance Test:** When the Environmental Protection Commission of Hillsborough County (EPCHC) 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 Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., 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, unless the EPCHC obtains other information sufficient to demonstrate compliance. The owner or operator of the emissions unit shall provide a report on the results of said tests to the EPCHC in accordance with the provisions of subsection 62-297.310(10), F.A.C. [Rule 62-297.310(8)(c), F.A.C.]
- FW.8. Objectionable Odor:** 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), F.A.C.]
- FW.9. Unconfined Emissions of Particulate Matter:** All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. The reasonable precautions employed by the facility should include, but not be limited to: [Rule 62-296.320(4)(c), F.A.C.]
- A) When loading material into railcars, load only into enclosed railcars.
  - B) Filtering the dust-laden displaced air from the railcar vent with a cloth filter.
  - C) Application of water or dust suppressants on unpaved plant grounds.
  - D) Removal of particulate matter from paved areas, buildings and work areas under the control of the owner/operator.
  - E) Use of the baghouse during crushing operations.
- FW.10. Transfer of Ownership:** If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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**FW.11. 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 Department. [Rule 62-4.090, F.A.C.]



## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### A. EU No. 001 – Batch Reactor Mix Tank

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
001	Batch Reactor Mix Tank

#### PERFORMANCE RESTRICTIONS

**A.1. Operational Limitations:** As requested by the permittee, the following operating limitations shall apply: [Rule 62-4.070(3), F.A.C. and Permit No. 0570229-008-AC]

- A) The maximum production rate shall not exceed 60 (sixty) tons per batch (on a dry basis).
- B) The number of batches per day shall not exceed 3 (three).
- C) The number of batches per twelve consecutive month period shall not exceed 1,095.

**A.2. Hours of Operation:** The hours of operation are not limited. [Rule 62-4.070(3), F.A.C.]

**A.3. Operational Limitations:** In order to ensure compliance with the emission limitations in Specific Condition No. A.4., the following restrictions and limitations shall apply: [Rule 62-4.070(3), F.A.C. and Permit No. 0570229-008-AC]

- A) The scrubber shall be in operation prior to the addition of bauxite or sulfuric acid to the batch.
- B) The scrubber shall remain in operation for at least the initial 3.5 hours of each batch to ensure that the control device is operating during the period in which the maximum emissions are emitted.
- C) The permittee shall maintain and operate the scrubber in accordance with the manufacturer's recommendations.

#### EMISSIONS STANDARDS

**A.4. Emissions Standards:** In order to limit the potential to emit of the emission units, the particulate matter emissions and the visible emissions (VE) shall not exceed the following limitations: [Rules 62-4.070(3), F.A.C., Permit Nos. 0570229-008-AC and 0570229-013-AC, and Rule 1-3.52, Rules of the EPC]

Allowable	Particulate Matter Emissions	VE Standard
0.03 gr/dscf	3.15 tons	5% opacity

#### TESTING REQUIREMENTS

**A.5. Annual Compliance Tests:** Test the exhaust of the Batch Reactor Mix Tank (EU 001) for visible emissions annually, once per calendar year (January 1 – December 31). The visible emissions observation period shall be at least 60 (sixty) minutes and be performed during the period in which the maximum emissions are emitted. Submit two copies of the test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within forty-five days of such testing. Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C. [Rule 62-297.310(8)(a)3., F.A.C.]

**A.6. Testing Capacity:** Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of the rated capacity of 60 tons (on a dry weight basis) of product per batch. If it is impracticable to test at the testing capacity, an emissions unit may be tested at less than the testing capacity. If an emissions unit is tested at less than the testing capacity, another emissions test shall be conducted and completed no later than 60 days after the emissions unit operation exceeds 110% of the capacity at which its most recent emissions test was conducted. Operating at conditions which do not reflect the normal operating conditions may invalidate the data. [Rules 62-4.070(3) and 62-297.310(3)(b), F.A.C.]



### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### A. EU No. 001 – Batch Reactor Mix Tank

**A.7. Test Notification:** At least 15 days prior to the date on which each required emissions test is to begin, the owner or operator shall notify the EPCHC, unless shorter notice is agreed to by the EPCHC. The notification shall include the date, time, place of each such test, Facility ID Number, Emission Unit ID Number(s) and description(s), Emission Point Number(s) and description(s), test method(s), pollutant(s) to be tested, along with the name and telephone number of the person who will be responsible for conducting such test(s) for the owner or operator. If a scheduled emissions test needs to be re-scheduled, the owner or operator shall submit to the appropriate air compliance program a revised notification at least seven days prior to the re-scheduled emissions test date or arrange a re-scheduled test date with the appropriate air compliance program by mutual agreement. In addition, tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(9), F.A.C.. [Rule 62-297.310(9), F.A.C.]

**A.8. Test Methods:** Required tests shall be performed in accordance with the following reference methods:

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

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

#### MONITORING REQUIREMENTS

**A.9. Annual Equipment Inspection:** The permittee shall annually perform a visual inspection of the tank(s), pumping system, pipes, hoses, valves and associated auxiliary instruments/equipment for rust, cracks, or leaks and ensure that all emission control devices are functioning properly. The permittee shall document and retain all findings and corrective actions taken for a minimum period of twenty-four months. [Rule 62-4.070(3), F.A.C.]

**A.10. Scrubber O&M:** The pollution control equipment (scrubber and building enclosure) shall be operated and maintained in good repair to perform adequately the function for which they are intended. Maintenance shall include, but is not limited to, daily/weekly/monthly/quarterly/annual inspections and replacement or repair of faulty equipment when necessary or as required by the manufacturer. The permittee shall comply with the requirements of the Operation and Maintenance (O&M) Plan for the scrubber as described below: [Rules 62-4.070(3) and 62-296.700(6), F.A.C.]

##### Scrubber

###### A) Process Parameters:

- i. Manufacturer: Bionomic Industries
- ii. Model Name and Number: Bionomic Series 4000
- iii. Type: Model 6 cross-flow scrubber
- iv. Maximum Design Gas Volume: 10,000 acfm
- v. Average Inlet Temperature: 209 °F
- vi. Scrubbing Flow Rate: 35 - 50 gpm (recycle)
- vii. Design Spray nozzle pressure: 10 psig
- viii. Pressure drop across scrubber: less than 3 inches w.c. (max. – 5 psig)
- ix. Efficiency: Sulfuric acid mist: 95%
- x. Efficiency: Particulate Matter: 98%
- xi. Process controlled by scrubber: Aluminum Sulfate Batch Reactor
- xii. Operation Schedule: 8,760 hrs/yr

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### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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#### A. EU No. 001 – Batch Reactor Mix Tank

- B) The following observations, checks and operations shall be conducted on the schedule specified.

Daily

- i. Inspect the general condition of the equipment when the equipment is in operation

Monthly

- i. Inspect the packing media
- ii. Inspect the spray nozzles
- iii. Inspect the ducts and drains
- iv. Inspect the re-circulating piping

Quarterly

- i. Inspect the fan shaft bearings
- ii. Inspect the fan drive coupling
- iii. Inspect the fan motor

Annual

- i. Inspect the fan blades

#### RECORDS AND REPORTS

**A.11. 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. For each test run, the report shall also indicate the following: [Rule 62-297.310(10), F.A.C.]

- A) Date of the test
- B) The production rate of the batch (on a dry basis) in tons
- C) The scrubber pressure drop
- D) The scrubber liquid flow rate

**A.12. Records:** In order to demonstrate compliance with Specific Condition No. A.1., the permittee shall maintain records of operations for the most recent three year period. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state or federal air pollution agency upon request. The records shall include, but not limited to, the following: [Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C.]

- A) Day, Month, Year
- B) Number of batches per day
- C) Amount of liquid aluminum sulfate produced (tons per batch, on a dry weight basis)
- D) Monthly and rolling 12-month totals of B) and C) above
- E) Records as required by Specific Condition Nos. A.9. and A.10.

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### B. EU Nos. 002, 003, 004 – Railcar/Truck Loading, Material Handling Building, and Storage Silo

This section of the permit addresses the following emissions units.

EU ID No.	Emission Unit Description
002	Railcar/Truck Loading
003	Material Handling Building
004	200-ton Bauxite/AAS Storage Silo

#### PERFORMANCE RESTRICTIONS

**B.1. Operational Limitations:** As requested by the permittee, the following operating limitations shall apply per twelve consecutive month period: [Rule 62-4.070(3), F.A.C., and Permit No. 0570229-013-AC]

- A) The bauxite throughput shall not exceed 20,000 tons, on a dry weight basis.
- B) The alternate alumina (AAS) throughput shall not exceed 2,000 tons, on a dry weight basis.
- C) The hours of operation for the Railcar/Truck Loading operation (EU No. 002) shall not exceed 1,138 hours.
- D) The hours of operation for the material handling building (EU No. 003) and the storage silo (EU No. 004) are not limited.

#### EMISSIONS STANDARDS

**B.2. Visible Emissions Standard:** Visible emissions from any emission unit, transfer point, and any material handling activity shall not exceed 5% opacity. [Rule 62-296.712(2), F.A.C. and Ch. 1-3.52(2) Rules of the EPCHC]

#### TESTING REQUIREMENTS

**B.3. Annual Compliance Tests:** Test the exhausts of the Railcar/Truck Loading (EU 002), the Material Handling Building (EU 003), and the Bauxite/AAS Storage Silo (EU 004) as follows for visible emissions annually, once per calendar year (January 1 – December 31). Submit two copies of the test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within forty-five days of such testing. Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C. [Rules 62-4.070(3) and 62-297.310(8)(a)3., F.A.C.]

- A) Each visible emissions observation period shall be at least 30 minutes.
- B) When performing visible emissions testing on the Material Handling Building (EU No. 003), the opacity reading of the roof vents or the entrance door, whichever is higher, shall be recorded for the building.
- C) Test the material handling building (EU No. 002) while the hammermill crusher and front-end loader are operating.
- D) Test the material handling building (EU No. 002) during truck loading or unloading. If a truck is not loaded or unloaded during the calendar fiscal year, notify the Air Compliance Section of the EPCHC in writing and test the next truck for opacity that is loaded or unloaded at the facility.
- E) Test the railcar filter vent. If a railcar is not loaded during the calendar year, notify the Air Compliance Section of the EPCHC in writing and test the next railcar for opacity that is loaded at the facility.

**B.4. Testing Capacity:** Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of the rated capacity of 23 tons/hour for the railcar/truck loading operation (EU No. 002) and the silo filling operation (EU No. 004). For the Material Handling Building (EU No. 003), capacity is defined as 90-100% of the rated capacity of 23 tons/hour for the hammermill crusher and 46 tons/hour for the truck unloading and loading operation. If it is impracticable to test at the testing capacity, an emissions unit may be tested at less than the testing capacity. If an emissions unit is tested at less than the testing capacity,

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### B. EU Nos. 002, 003, 004 – Railcar/Truck Loading, Material Handling Building, and Storage Silo

another emissions test shall be conducted and completed no later than 60 days after the emissions unit operation exceeds 110% of the capacity at which its most recent emissions test was conducted. Operating at conditions which do not reflect the normal operating conditions may invalidate the data. [Rules 62-4.070(3) and 62-297.310(3)(b), F.A.C.]

- B.5. Test Notification:** At least 15 days prior to the date on which each required emissions test is to begin, the owner or operator shall notify the EPCHC, unless shorter notice is agreed to by the EPCHC. The notification shall include the date, time, place of each such test, Facility ID Number, Emission Unit ID Number(s) and description(s), Emission Point Number(s) and description(s), test method(s), pollutant(s) to be tested, along with the name and telephone number of the person who will be responsible for conducting such test(s) for the owner or operator. If a scheduled emissions test needs to be re-scheduled, the owner or operator shall submit to the appropriate air compliance program a revised notification at least seven days prior to the re-scheduled emissions test date or arrange a re-scheduled test date with the appropriate air compliance program by mutual agreement. In addition, tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(9), F.A.C. [Rule 62-297.310(9), F.A.C.]

- B.6. Test Methods:** Required tests shall be performed in accordance with the following reference methods:

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

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

#### MONITORING REQUIREMENTS

- B.7. Annual Equipment Inspection:** The permittee shall annually perform a visual inspection of the pipes, hoses, valves and associated auxiliary instruments/equipment for rust, cracks or leaks and ensure that all emission control devices are functioning properly. The permittee shall document and retain all findings and corrective actions taken for a minimum period of twenty-four months. [Rule 62-4.070(3) F.A.C.]

#### RECORDS AND REPORTS

- B.8. 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. For each test run, the report shall also indicate the following. [Rule 62-297.310(10), F.A.C.]

- A) Date of the test
- B) Emission Unit Number
- C) Baghouse pressure drop, as applicable
- D) Amount of material handled during the test
- E) For the Material Handling Building (EU No. 002), specify if the hammermill crusher and the front-end loader were in operation during the test

- B.9. Records:** In order to demonstrate compliance with Specific Condition No. B.1., the permittee shall maintain records of operations for the most recent three year period. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state or federal air pollution agency upon request. The records shall include, but not limited to, the following: [Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C.]

- A) Day, Month, Year
- B) Bauxite throughput (tons)
- C) Alternate Alumina (AAS) throughput (tons)
- D) Hours of operation for the Railcar Loading operation.

### **SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS**

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- E) Monthly and rolling 12-month totals of the B) thru D)
- F) Records as required by Specific Condition No. B.7.